

To Whom it May Concern:

In 4th grade, I chose Idaho for my Social Studies year long project. I studied everything from the state bird (mountain bluebird) to public lands (roughly 4.8 million acres). I had Idaho pen-pals, drew postcards of interesting places, spoke with Governor Cecil Andrus and fell in love with the state. Years later when I was getting ready to move, my 4th grade teacher asked if my project had been on Delaware, would I be moving there. Probably not.

I have been a Valley County resident for 20 years. I moved here for the waters and woods. The proposed Stibnite Gold Project will impact the waters and woods I came for. Thank you for the opportunity to comment on the Draft Environmental Impact Statement. I have a number of concerns and questions.

**Length of comment period.** The National Environmental Policy Act (NEPA) allows for a comment period of up to 120 days. Forest Supervisor Linda Jackson wrote in the *Dear Interested Party* letter (found just before the Executive Summary in the DEIS), "I have decided to extend the comment period by 15 days leading to a total of 60 days following publication of the NOA and legal notice, given the level of documentation associated with this project." It took years to write the DEIS and the "level of documentation associated with [the] project" is extensive. Thank you, Forest Supervisor Jackson, for the extra 15 days given initially and the subsequent 15-day extension granted later. Why did the comment period not start at the maximum allowable time? The highly technical and lengthy DEIS is difficult to read and digest. People are encouraged to write substantive comments and to cite specifics from the DEIS. In order to be substantive and make citations, one needs to read the DEIS. Why not give all the time to do so? What benefit is there to rush the comment period? If the goal is to create the best possible Project and outcomes, why not give the public all the time to assist in reaching this goal?

**Lack of access.** Why were print copies of the DEIS not available in prominent locations throughout the area? One copy at the McCall library during a pandemic does not cut it. Valley County, not to mention much of the country, has been experiencing internet connectivity challenges for most of 2020. The increased reliance on infrastructure and therefore the decrease in available bandwidth was no longer a surprise when the DEIS was released in August 2020. In reality, local infrastructure challenges were set to get worse in August with the start of the school year and the hybrid learning model. Why did the Payette National Forest fail to consider internet constraints when releasing the DEIS by providing print copies? Additionally, why were individuals who do not have computer access excluded from this process?

**Incomplete and Unavailable Information.** Chapter 4.1.2. "The [Council on Environmental Quality] CEQ regulations state that, 'when an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.'" The incomplete and unavailable information is outlined in Table 4.1-1. The second row, fourth column of the table includes this statement, "[L]arge modeling efforts, such as these, often require significant amounts of data, which can be difficult and expensive to obtain." With a Project of this size and potential, why is *expense* and *difficulty* a barrier to gathering and analyzing data? Is the goal to do the best job possible? Is it possible to do the best when all the information is not available? Everything listed in the table is concerning -- uncertainty with modeling, post-closure runoff from development rock storage facilities, no aquifer pump test results, uncertainties regarding the hydraulic properties of pit backfill, incomplete emissions information, proprietary data being considered but not disclosed, disposal of groundwater, surface water management, adequacy of leak detection, geotechnical data for access roads, to name a few. Data and information gaps exist. Will there be additional work done to close those gaps? Because of incomplete or unavailable information, the public cannot understand the scope of these gaps and are therefore unable to understand the scope of the Project. When will the incomplete information be made complete? When will the unavailable information become available? Will there be an opportunity to comment once complete and available information occurs?

**Seismic Hazard Analysis.** Chapter 3.2.3.6.2 & chapter 4.2.2.1.1.3. While the DEIS notes that a M6.5 earthquake occurred in the area in March 2020, the "site-specific seismic hazard analysis" occurred 7 years ago (URS (2013)). Why aren't the full

analysis details of the URS 2013 report available? Why hasn't analysis after the March 2020 event been included? The USGS advises that aftershocks can occur for decades after a large earthquake. It is reasonable to update the seismic analysis to include activity from the past 8 months. What is the advantage of not doing this analysis? What is the benefit of ignoring recent seismic activity and patterns that have potentially impacted the area already and may continue to impact the area during the life of the Project? If additional seismic analysis is going to occur, will there be an opportunity for public comment once information is provided?

**Project to provide critical minerals.** A recent *Count Me In Idaho* mailer states, "antimony, a mineral that will be mined at Stibnite, is one of 35 minerals deemed critical for national security and supply chain independence by the U.S. Department of Commerce. Currently, the U.S. relies on China and Russia to meet our needs." In the Alternative 2 Antimony Concentrate Transport section of the DEIS, we learn the "antimony concentrate would be transported via Burntlog Route to State Highway 55, and then to a commercial barge or truck loading facility depending upon the refinery location. It is assumed that the concentrate, when sold, would be shipped to facilities outside of the U.S. for smelting and refining because there are currently no smelters in the U.S. with capacity for refining the antimony concentrate." Why are critical minerals and national security part of the conversation when it is clear the antimony will be sold to and refined by a foreign entity? Rather, the focus should be on the antimony concentrations left behind. The DEIS does not adequately address antimony toxicity in the Project area or downstream. Will there be further analysis on antimony toxicity from legacy and proposed mining activity?

**Additional concerns.** I have a number of additional concerns -- e.g., lack of analysis on all waterways within the Project area and transportation corridors (East Fork South Fork Salmon, South Fork Salmon, Middle Fork Salmon, Main Salmon, North Fork Payette, Main Payette, Snake, Little Salmon, Clearwater, Weiser River and more); waste management and hazardous waste storage on site; tailings containment systems; water treatment on site; mercury levels in the water being higher post-Project than pre-Project; inaccuracies in the baseline water quality analysis; lack of royalties paid by a foreign company mining on U.S. soil; access road avalanche dangers; public access to the area; water quality and treatment responsibilities in perpetuity; treaty violations; fish degradation; adequate spill plan disclosure; EMS response plans; backcountry winter travel considerations; Forest Plan alignment; magnesium chloride effects on backcountry roads; and many more concerns. I believe that with the full 120 days to study the DEIS I would have been able to provide substantive comments, complete with citations, on at least a few of these additional concerns. Instead, I am left hoping other members of the public have had time to explore and comment on these concerns.

Will you produce a thorough Supplemental DEIS that addresses my concerns and questions and those of our community? If not, why not? Will you provide a comment period of 120 days on the Supplemental DEIS? If not, why not?

Please do not rush this final stage to permit the Stibnite Gold Project. If the desire to restore and reclaim the Project area is real, doing so after further analysis and comment would be welcomed. If the intent is to have the best possible outcomes and the least possible negative impacts, again, further study would not be a deterrent.

Thank you for considering my questions. I appreciate the opportunity to engage in the NEPA process and to be part of the solution.

~Sacha Jackson