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July 13, 2020

Ms. Linda Jackson
Forest Supervisor, Payette National Forest
500 N. Mission Street
McCall, ID 83638
linda.jackson@usda.gov

BY ELECTRONIC AND U.S. POSTAL MAIL - Please confirm receipt

Re: Comment period extension request for the Stibnite Gold Project DEIS

Dear Ms. Jackson:

On January 4, 2020, Save the South Fork Salmon (SSFS) sent then acting Forest Supervisor a request to extend the comment period for the Stibnite Gold Project draft Environmental Impact Assessment (DEIS) from the statutory minimum of 45 days to a total of 120 days. *See* Attachment. The request was based on several factors, including the fact that this DEIS will be extremely voluminous and evaluate a variety of complex, technical issues, and there is a high level of public interest and significant controversy over the proposal.

Moreover, our letter explained, there is precedent for the Forest Service extending comment periods in cases similar to this one, where complex projects and voluminous environmental reviews are involved. Now, however, there is a new component that adds to the urgency for an extended comment period.

With the continuing increase in COVID-19 cases in Valley County and Idaho, it is now more imperative that the Forest Service grant this request for an extension of the comment period to 120 total days. Part of SSFS mission is to educate the public with the tools they need to effectively participate in the environmental review process under the National Environmental Policy Act (NEPA). Commenting on a proposed project is the most significant way that the public can communicate with the agency regarding the potential environmental

and community impacts and provide vital information so that the agency can make an informed decision. The importance of public comment to the integrity of the NEPA process and agency decision-making cannot be overstated.

The current trajectory of the pandemic in Idaho, particularly in the areas that will see the most direct impacts from the proposed Stibnite Gold Project, requires taking precautions to protect public health that will necessarily make it more difficult and time-consuming for SSFS members to engage with each other and the community in reviewing and commenting on the DEIS. Further, the rising number of COVID-19 cases in Valley County and Idaho will present challenges for the Forest Service to engage the public at meetings discussing the Stibnite Gold Project, including limited internet access in rural Idaho, attendance for individuals at higher risk of developing complications from COVID-19, and the broad economic upheaval which has placed additional stress and burdens on individuals and families thus reducing the amount of time available to participate in the Stibnite Gold Project NEPA process.

Group engagement in this instance, where the DEIS will be voluminous and contain highly technical information, is paramount to the public's effective participation in the NEPA process. The Forest Service should not create a situation where a person must choose between personal safety, such as protecting oneself from contracting COVID-19, and participating in the Stibnite Gold Project NEPA process. SSFS encourages the Forest Service to avoid a situation where public participation in this matter is attenuated in significant part due to the substantial and disparate impact of these unprecedented times.

For the reasons stated above, SSFS strongly urges the Forest Service to extend the DEIS comment period for an additional 75 days beyond the statutory requirement, to a total of 120 days. We thank you and the agency for their continued hard work in ensuring public engagement in this process is not curtailed or diminished, and consideration of an extension of the DEIS comment period.

Sincerely,

The Board of Directors for Save the South Fork Salmon, Inc.

cc: Victoria Christiansen, Chief, USDA Forest Service
Chris French, Associate Deputy Chief USDA Forest Service
David Rosenkrance, Deputy Regional Forester Region 4
Kevin Knesek, Deputy Supervisor, Payette National Forest