



Idaho Rivers United
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December 15, 2022

Ms. Linda Jackson
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RE: Stibnite Gold Project SDEIS Comment Deadline Extension Request

Dear Ms. Jackson:

I am writing to formally request an extension of the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS) comment period from the current 75-day period to 120 days as a result of additional project documentation being released to the public. These additional 45 days are critical for the public to review the data and analysis associated with this intricate and complex project proposal. Idaho Rivers United (IRU) is an environmental advocacy organization that is dedicated to protecting Idaho rivers and restoring our native fish populations. Since our inception in 1990, IRU has been working to defend Wild and Scenic rivers, advocate for endangered and threatened aquatic species, reform hydropower policy, and promote enhanced water quality in all of Idaho's rivers. IRU represents over 5,000 members throughout Idaho and beyond. As such, IRU has been engaged and closely following this project from its beginning.

The Stibnite Gold Project SDEIS is an extraordinarily complex project for the public to review and understand. There is no other permitted use of our public lands that have such a dramatic and permanent impact on the landscape, soil, water, and wildlife as large-scale mining. Even with restoration components, large-scale mining has significant, long-term water quality effects and other negative impacts. An extended public comment period for a project of this size and

complexity is consistent with the National Environmental Policy Act's (NEPA) purpose to ensure the public has informed access and input into federal agency decision-making on matters significantly affecting the quality of the human environment.

The need for an extended comment period becomes more poignant when one considers the the volume of data and analysis that must be reviewed to form a clear and informed opinion of this complex project. When we began this review process, the Forest Service committed to providing additional documents or data that had not been included in the October 28, 2022 SDEIS release which we, and other organizations and members of the public, could request through the Deputy Forest Supervisor, Mr. Kevin Knesek. The Forest Service has been very responsive to those requests and we are grateful for the agency's commitment to the NEPA process. However, as we and our partners have delved into the SDEIS documentation, we have also found numerous cited resources that were not included in the original data upload to the project webpage.

At the time of this letter, there have been **34** newly uploaded documents since October 26th, 2022. 29 of these documents have been uploaded after December 1, 2022 which leaves less than 45 days for the public to review. Additionally, these 34 documents, excluding the over 8,000-page Air Quality Analysis document, total **more than 2,900 pages**. Further, the Forest Service set the comment period for a calendar space that contained four Federal holidays and dates important to numerous cultures, including Thanksgiving, Christmas, Hanukkah, Kwanzaa, Winter Solstice, and New Year. We believe it is both impractical and unreasonable for the Forest Service to expect to receive thoughtful and relevant feedback for the SGP without allowing additional time to review newly available information. Noting that most of these documents were cited as reference material that should have been provided with the release of the SEIS, the decision not to extend the deadline is arbitrary and capricious and counter to the intent of NEPA.

The 34 documents that have been uploaded (upload date provided in parentheses) since October 26, 2022 are:

- Site Specific Seismic Hazard Assessment (November 18)
- Air quality Analysis (November 29)
- Midas Gold Far-Field Air Quality Impact Analysis Protocol for Stibnite Gold Project, Technical Memorandum (November 29)
- Unpaved Road Dust Control Efficiency from Chemical Suppressants Technical Memorandum (November 29)
- Stibnite Gold Project Air Quality Analysis Addendum ModPRO2 (November 30)
- Stantec Access Road and Ambient Air Boundary Applicability memo (December 2)
- Stream Functional Assessment (December 2)
- Stream Design Report (December 8)
- Stibnite Gold Project Supplemental HAP Air Quality Analysis Addendum ModPRO2 (December 9)
- Fish Passage Barriers Critical Habitat Intrinsic Potential and Occupancy Model Impacts (December 9)
- Stream Temperature Impacts on Fish: Chinook Salmon, Steelhead Trout, Westslope Cutthroat Trout and Bull Trout (December 9)
- Intrinsic Potential Model Chinook salmon and Steelhead (December 9)

- Chinook Salmon Flow-Productivity Analysis (December 9)
- Appendix J-6, Chinook Salmon Critical Habitat Technical Memorandum (December 9)
- Habitat Occupancy Model Westslope Cutthroat Trout and Bull Trout Alternative 1 (December 9)
- Appendix J-9, Bull Trout use of Lake Habitat Technical Memorandum (December 9)
- Summary of Existing Phabsim Data to Inform Impacts on Westslope Cutthroat Trout and Bull Trout (December 9)
- Isaak et al., 2017; Big Biology Meets Microclimatology.... (December 9)
- 2021 Modified Mine Plan Chinook Salmon Flow-Productivity Analysis (December 13)
- 2021 Modified Mine Plan Fish Passage Barriers (December 13)
- 2021 Modified Mine Plan Stream Temperature Impacts (December 13)
- 2021 Modified Mine Plan Steelhead Flow-Productivity Analysis (December 13)
- 2021 Modified Mine Plan Occupancy Model (December 13)
- 2021 Modified Mine Plan Intrinsic Potential Model (December 13)
- 2021 Modified Mine Plan Phabsim Analysis (December 13)
- Maret et al., 2006, Inflow Stream Characterization of Upper Salmon River Basin Streams, Central Idaho, 2005 (December 14)
- Hydrology Field Survey for Golden Meadows Project (December 14)
- Final Stibnite Gold Project Stream and Pit Lake Network Temperature Model Existing Conditions Report (December 14)
- Stibnite Gold Project Stream and Pit Lake Network Temperature Model Proposed Action and Proposed Action with Modification Report (December 14)
- Stibnite ESA Consultation memo (December 14)
- Stibnite Gold Mine Access Road Avalanche Hazard Assessment Report (December 14)
- Concept Avalanche Plan (December 14)
- Draft Wildlife Habitat Mitigation Plan (December 14)
- Draft Appendix A WHMP Ledger (December 14)

As I mentioned earlier, we do appreciate the Forest Service's willingness to respond to our data requests and to have follow-up conversations. However, the fact that so many documents have been produced by such requests only highlights the need for additional time for public review.

We ask you to expand the public comment period by providing a 45-day extension. This will give members of the public reasonable time to review the SDEIS and provide meaningful and relevant comments and recommendations to the agency. Thank you for your time and consideration.

Sincerely,



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