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First name: Collin

Last name: Nickless

Organization: Save the South Fork Salmon

Title:

Comments: Save the South Fork Salmon requests that the public comment period for the Stibnite Gold Plan of Operations Draft Environmental Impact Statement (DEIS) be extended 75 days for a total comment period of 120 days. An extension from the required 45 days for a DEIS under the Forest Service's regulations 36 C.F.R. 215.25(a)(1)(ii) is required in order to provide adequate time to provide meaningful and lawful public participation under the National Environmental Policy Act (NEPA).

Save the South Fork Salmon (SSFS), a non-profit corporation under the State of Idaho, is a community-based organization in West Central Idaho that cherishes the mountains and waters of the greater Salmon River ecosystem. One of our primary roles is to provide factual information to the general public regarding the potential environmental and socio-economic impacts posed by the proposed Stibnite Gold Project. We also work to promote public engagement in the environmental review process by providing the public with tools on how to effectively write public comment during the NEPA process for the proposed Project. SSFS anticipates that it will provide public comment on the DEIS as well.

The Stibnite Gold Plan of Operations will have far reaching impacts[mdash]whether it be beneficial or adverse[mdash]on the environment and the socioeconomics of the communities within Valley County, Idaho. Public appreciation of the Payette National Forest, the Stibnite area, and in particular, the Salmon River and its tributaries by Valley County residents and visitors alike is immense. The South Fork Salmon River is habitat for endangered and threatened species and one of only four drainages in the Columbia basin that supports wild populations of native steelhead. The river is a major economic driver in Valley County for sport fishing and is of significant cultural importance to the Nez Perce Tribe. A project the size of the Stibnite Gold Project will drastically impact some of the nation's greatest forests and rivers and have irreversible, long-term environmental and socioeconomic impacts to Valley County, Idaho; all of which warrant an extension of the DEIS comment period.

The Plan of Restoration and Operations (PRO)[mdash]which is essentially a description of the project with no environmental analysis[mdash]is already several hundred pages long. The project proponents, Midas Gold Corp., Midas Gold Idaho, Inc., Idaho Gold Resources LLC, and Stibnite Gold Company (collectively Midas Gold) have since submitted a substantial modification to their PRO, which has furthered delayed publication of the DEIS.

The DEIS will necessarily evaluate a variety of complex technological and scientific issues related to mining, proposed restoration and mitigation, as well as required post-operation reclamation and closure plans. Based on the length of the modified PRO, the draft EIS can reasonably be anticipated to be well over 1,000 pages, possibly even over 2,000 pages. Given that Midas Gold and the Forest Service have taken years to complete the DEIS, and continue to remain under the average timeline for a project of this magnitude and complexity, an extension of time for the public to review what will be a voluminous document is necessary. We believe that the requested extension of time will enable us and the public to provide more meaningful feedback, which will be valuable to everyone involved in this process. Furthermore, granting this request for an extension of time to comment will allow the Forest Service to meet its obligations under NEPA to ensure that information on the environmental impacts of this Project is made available to the public before irreversible decisions are made.

The Stibnite Gold Project is not a project that will be jeopardized by a two-and-a-half month extension of time for the public to have adequate time to review the DEIS. After years of planning, in September 2016, Midas Gold released its PRO. By the January 2020 anticipated release of the DEIS, Midas Gold and the Forest Service will have taken roughly 40 months to complete the environmental analysis. A longer comment period of 120 days would represent only ten percent of the total time to date taken to prepare the DEIS since the PRO was

submitted, and less than two percent of the total expected time the mine will be in operation. Failing to provide an extension of time to comment will defeat NEPA's policy of "[e]ncourag[ing] and facilitat[ing] public involvement in decisions which affect the quality of the human environment. 40 C.F.R. 1500.2(d).

There is precedent for the agency in either initially providing for longer comment periods, or extending them on projects with immense public interest, competing opinions, and that involve complex environmental analysis. For example, just last month, the Tonto National Forest closed a 90-day comment period on the 714-page (excluding appendices) Resolution Copper Project and Land Exchange DEIS.⁶ For the Rosemont Copper Project DEIS, a DEIS of only 754 pages (excluding appendices),⁷ the Coronado National Forest initially provided a 90-day comment period that was later extended by another two weeks.⁸ The Forest also held seven informational and oral comment meetings in local communities.⁹ The Salmon-Challis Forest extended the Idaho Cobalt Project DEIS comment period from 60 days to 90 days, "in response for requests for additional time to review."¹⁰

The 45-day public comment under NEPA is statutorily contemplated as the minimum timeframe setb apart for meaningful disclosure and public participation. At this juncture, the present situation--the size of the project, the technical complexity, the length of time taken by the Agency to prepare the DEIS, the anticipated voluminous document, and the immense public interest--only strengthens the argument that a 75-day extension of time for public comment is in the best interest of the community and the environment.

Thank you for your consideration of this request that is essential to ensuring meaningful public involvement in the Stibnite Gold Project.

6 Resolution Copper Project and Land Exchange Draft Environmental Impact Statement, available at: <https://www.resolutionmineeis.us/sites/default/files/deis/resolution-deis-full-copy.pdf>.

7 Rosemont Copper Project Draft Environmental Impact Statement, available at: <https://www.rosemonteis.us/files/deis/deis-covervol1.pdf>.

8 Rosemont Copper Project and Amendment of the Coronado Land and Resource Management Plan Record of Decision pg. 70, available at: <https://www.rosemonteis.us/files/final-eis/rosemontfeis- final-rod.pdf>.

9 Id.

10 Idaho Cobalt Project Final Environmental Impact Statement pg. 1-3.