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Comments on Stibnite Gold Project EIS #50516

To Whom It May Concern,

Among other concerns, a primary issue regarding the Stibnite Project that I am concerned with is that approval of the Stibnite Project will drastically and suddenly increase recreational and non-recreational user impacts upon resources in the Payette and Boise National Forests.

The project will bring many, many people to the surrounding area. This will happen through employment, friends and relatives of employees, and other visitors attracted by the increased development by communities to accommodate and capitalize in this growth.

This letter is not objecting to growth or increase in visitation, per se, nor even the amount growth that may result in time. However, should the Stibnite project be approved, the increase in users will be sudden and drastic. The fast rate of an increase user density will create problems for resource management that occur too rapidly for proper mitigation.

By resources affected by a sharp increase in user numbers and density, I mean such thing as to include but not be limited to wildlife, wildlife habitat, fisheries, fisheries habitat, archaeology and historical resources, trail use, tribal resources, and wildfire risk.

For example, just last week three moose were shot in the area near Smith's Ferry. Two of these were incidents of misidentification as elk. With increase in users to the area, such accidents will increase. More people mean more erosion, fire-risk, hunting and fishing pressure, habitat disruption, and simply more things to manage.

The EIS #50516 does not provide adequate analysis of impacts on the above listed resources as a result of rapidly increased recreational and non-recreational use throughout the entire Payette and Boise National Forests. The increase needs to be looked at in terms of both scope (size) and rate of change. In addition, how increased recreational and non-recreational use impacts will affect local and tribal communities has not been analyzed sufficiently.

Midas Gold has repeatedly used the promise of regional economic growth as a reason why local communities should support the project. Issues of support aside, the use of growth as incentive shows that the project applicants expect area wide increase in population, visitation, and general human activity to increase. Midas Gold has, therefore, claimed that rapid growth is within the scope of their project. The time frame of the project entails a rapid increase. Increase in user impacts resulting from project approval must be re-assessed to formulate appropriate measures of resource protection and mitigations that have not been thoroughly addressed by the EIS.

Any approval of the Stibnite Project would need to include how resource management capabilities, in terms of personnel, planning, and material support, will be preemptively increased to ensure that resources are not harmed by the sudden and drastic growth the project will bring. This increase in support needs to occur at a Forest-wide level throughout the Boise and Payette National Forests. Moreover, because the drastic increase in users will come from a broad geographic area, preemptive coordination of minimizing adverse user effects will

need to occur at a Region-wide, if not larger area. Furthermore, because the unnaturally rapid growth in user pressure will be an effect of the project, much of this needs to be provided by the interested parties.

A related issue is that institutional measures of coordination between management agencies, such as the PNF and Idaho Fish and Game will need to preemptively be improved in order to handle the increased workload of coordinated management that will be required to minimize increasingly complex effects of increased user pressure.

Thank you,

Sean Gould