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First name: Jesse

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Organization:

Title:

Comments: Mrs. Linda Jackson

Re: Proposed Stibnite Gold Project Comment Extension Request

500 N. Mission Street

McCall, ID 83638

linda.jackson@usda.gov

Dear Mrs. Jackson - Payette Forest Supervisor

I write to you today in reference to the proposed Stibnite Gold Project; more specifically the allotted time to comment.

For twelve of the past thirteen years I have had the extreme pleasure of being a seasonal worker for the United States Forest Service on the Payette National Forest. Being stationed on the border of, and within, the 'River of No Return Wilderness' has afforded me an amazing matchless life experience. I have observed and participated first hand in recreational forest management within the largest contiguous Wilderness area in the lower 48 states. It has also allowed me to stand in awe at the beautiful and harsh realities that come with it.

I find it troubling that this unique project was not allotted the maximum amount of time to comment and critique from its publication. Considering the history, complexity, and dynamic characteristics (for example its proximity to Waters Of The United States (WOUS) and known aquifers, the overwhelming size of the area being requested to operate/impact that are located on and surrounded by public lands managed by the United States Forest Service, the fact that the proposed mining impacts are in the heart of historical and current cultural use areas for three Native American tribes, and the proximity to the vastest, unbroken, road-less area in the lower 48 United States (the River of No Return Wilderness); of which I am most biased) it seems there would be an incredible amount of information to pour through. The last sentence of the first page in the Executive Summary states it clearly - The Stibnite Gold Project area is a complex blend of both remote wilderness lands with high recreational values and potential wilderness characteristics [hellip]

After reading the executive summary it is apparent that this proposed project would negatively impact the operational area and its surroundings in perpetuity. Since that is the case, and if any of the proposed alternatives are accepted (except for alternative 5), should the public not be allowed the maximum opportunity to comment considering the irreversible negative impacts that will be placed upon the public landscape for an unforeseen

amount of time in the future (as stated in the Executive Summary)? Is there harm in allowing all national forest users the maximum amount of time to constructively weigh in on a project that is stated to have impacts that are irreversible and would require constant observations after reclamation (as stated in the Executive Summary)?

I mean no offense mam, but in 20 years (or however long it takes, as written in the Executive Summary) when the proposed project is no longer be in operation, you may not be living here, along with many others. But the landscape will still exist, and all that comes along with it. And apparently now, a water treatment facility.

As the forest supervisor is it not your duty to uphold the health of our forests and ecosystems that you manage and to promote robust, transparent public involvement and education to best complete the United States Forest Service's mission - 'to sustain the health, diversity, and the productivity of the nation's forests and grasslands to meet the needs of the present and future generations'?

Please receive this message as a request to lengthen the comment period on the Draft Environmental Impact Statement for the proposed Stibnite Gold Project to the full 120 days. There are several reasons for which I am making this request. They are as follows:

- Several times within the last few weeks, I have attempted to download and or access the DEIS using the Payette National Forests Stibnite web page and the documents are not available. (As far as I am aware, I am not the only one having this error occur) It is redirecting me back to the original page. I understand that the forest has been working hard to compile, build, and maintain this vast amount of information on the proposed project but how is the public supposed to comment on a document that is unavailable to them? There shouldn't be a DEIS that is consistently unavailable for people to access via limited internet access or errors and also not having enough printed copies available to the public that live in the communities this proposed project will affect the most. Also, I'm not sure if you are aware but I have also attempted several times to email you a copy of my request at the email address provided in the Executive Summary. According to automated messages, your email as listed (linda.jackson@usda.gov) does not exist. There is in fact a Linda L. Jackson but according to the Forest Service employee search, she works in Region 9. For a project this size and of the impacts that are listed in the Executive Summary (which has been published by the forest) are serious in nature, should you not be able to be reached accordingly to answer concerns?

- The more time the general public is allowed to study this draft the more complete it will become in the future. As of right now, the draft represents just that; a draft - a preliminary version of what will be the final environmental impact statement offered for this proposed project. With more time to study and constructively critique the draft and its proposed processes it will become a stronger piece of literature. It will become more scientifically substantial as to represent the true impacts of this project on the qualities, which according to the executive summary (pg ES-7) are listed in all alternatives, to have significant negative environmental impacts. As I am sure you would agree, a rushed and incomplete analysis will only further degrade and threaten the ecosystem, the environment, and the communities that thrive on their existence even further. Not to mention the reputation of the

U.S. Forest Service in general.

- This proposed project (I feel) should be scrutinized to the nth degree. If it is found to be incomplete and lacking (thus far rings true) it is only done so with the best intentions for everyone; supporters and non-supporters alike. I understand there is a delicate dance that occurs in permitting a project of this magnitude between investors, developers, project supporters, and employees that work for the company proposing the project of this magnitude; it's in their best interest to keep everyone happy and the project moving 'forward'. But, should it not be up to the public and it's responsible agencies to decide the timeline to comment? Is it not in our best interest to take into consideration all possible available information and to be able to have a complete view of impacts left by a project this size, that will last on National Forest System lands forever? 120 days is a fraction, a small fraction, of time compared to the full length of the proposed project operations and reclamation (if it is even to occur).

- For a project that would be the largest that Valley county has seen and to have irreversible negative environmental impacts for an undetermined amount of time, 120 days to weigh in, wade through, and offer substantive critique is the least that should be offered.

- After research into other projects on National Forest System lands that compare to a project of this size and with exponentially smaller Draft Environmental Impact Statements, extensions have been granted to a more lengthy degree. For example - the Resolution Copper Project on the Tonto National Forest (only 714 pages) received a 90 day comment period. The Rosemont DEIS (only 754 pages) received a 104 day public comment period. The Stibnite DEIS is as far as I can tell over 2,000 pages without appendices - I would give you a more accurate number but as of this moment the information is unavailable for download on the Forest Service web page for the project and the Forest Information Officer's mailbox is full therefore I can not receive that exact information.

- By setting a minimum amount of time to comment do we not set the bar lower than it could be for public involvement/transparency? Do we not want to set a higher precedent for expectations on projects that want to operate and influence our public lands in the future? Because, once they are gone, there's no turning back.

- By not allowing the general public, businesses, and interested parties the full amount of time to provide a comment it will erode at NEPA's policy of "encouraging and facilitating public involvement in decisions which affect the quality of the human environment" (40 C.F.R. 1500.2(d)).

- My experience working the last few seasons has been this: forest users are concerned. They are concerned for the health of our fisheries habitat, abilities to drive on roads and impacts to recreational access, hunting availability and impact on wildlife, water quality, how their children will not be able to see the forest as they once did, rights-of-way, tribal access (have you ever experienced a fishing season along the South Fork of the Salmon?), to name a few. While completing forest contacts along my assigned patrol area over the last several

seasons it has become a guarantee that each day a forest user will approach me to express concern over the proposed project and impacts it will leave behind along with experiences it will influence if permitted. True concern. We all receive disrespectful, unruly comments, and harassment, which unfortunately we consider normal now; but these contacts were of true concern. For instance, this last season I fielded more questions concerning the proposed project than any season prior. There were countless 'What ifs?' asked. And when asked, I answered honestly. 'The best thing you can do to express your concern or have your answers addressed is to contact the Forest Supervisors office and be as constructive and respectful as possible.'

Now, out of duty and as a steward to our public lands, I am now doing the same. I am concerned. And I have a lot of questions.

We have a saying when working with and training SCA (Student Conservation Association) interns on trail work standards within the Wilderness; a program that has been used for over 30 years. For most of them, it is their first time backpacking, much less holding an ax. "There's never time to do it right, but there's always time to do it again." It is a reply to crews who come in early not completing work that is assigned yet having time to do so, leaving faulty rock walls or trees across trails not cleared to required widths which in turn is dangerous to forest users. So what do we do when they come in early with incomplete work?

We send them back.

This Draft Environmental Impact Statement seems like incomplete work and as far as I've read contains many - uncertainties. And that is dangerous, not only to the project but also to the future of our National Forest System lands and communities that surround and thrive off of them. We shouldn't be hastily allowing project proposals that pose direct threats to surface and groundwater, sensitive plant species, wetlands, and riparian areas, federally protected fish species, travel and recreation, wilderness characteristics, and tribal access (as stated in the Executive Summary) to pass through our hands incomplete and without the clearest investigation and analysis available. To have that..., we need more time and honestly, we deserve better.

At this point, we still have time to do it right, if you will allow us. If not, then I am afraid we (as in the public) will not have a fair chance to provide adequate and substantial feedback to complete the process.

This all being said - please know I will be submitting comments to the best of my ability, but also know it would be of a higher and a more constructive and productive standard if I were allowed more time to analyze the entire breadth of the document. In final, please see this as a respectful request to extending the comment period for the proposed Stibnite Gold Project to the full 120 days that are available.

Thank you mam for your time and consideration of my comment period extension request.

Jesse R. Lutz

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