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Comments: The Payette National Forest has erred in approving the Stibnite Gold Plan of Operations as complete in 2016, then released a poorly organized document called the Stibnite Gold Project (project) Draft Environmental Impact Statement (DEIS) with inadequate review time for public comment during the Covid-19 pandemic. The DEIS is an intimidating and overwhelming 6,000 page beast too complex and vague for the majority of the populace to even download, much less engage in commenting. It is not written at a high school level plus the nesting of references and numbering system (3.2.3.4.1.2.2) is unusable and ridiculous. Please revamp this entire document to a shorter, easier, honest, informative disclosure paper. Much of the data reported here is smoke and mirrors. The models cannot be duplicated. The average person is unable to comprehend the gist of the materials. The only solution to the many flaws in the August DEIS is to start over with a proper plan of operations from the proponent (Alternative 2), then conduct scoping of that proposed action, revise or better yet, start over with another DEIS effort or release a supplemental DEIS. The Forest is vulnerable on many fronts, I will name a few.

The need for federal action to respond to Midas Gold's plan of operations to mine gold, silver, and antimony deposits in central Idaho is questionable since the 2016 plan of operations is flawed by misrepresenting the fact that antimony cannot be economically refined in the United States. Therefore the purpose of economic viability of antimony mining is questionable too.

The limited range of alternatives violates the National Environmental Policy Act. There should be an alternative that does not have any Forest Plan amendments and, a no action which sets a higher standard than the current existing condition

The mining proponent has led an aggressive and distasteful public relations campaign which has arguably backfired on their claims of transparency. The Payette National Forest (Forest) subordinated their authority to political pressure by not adhering to the multiple use policy of the agency. Undue influence by the mining proponent has been obvious throughout the inner workings of the NEPA process from letting them draft a biological assessment to moving the ID team and DEIS reviewing authority from the local Forest to the Regional and Washington office levels.

When is it acceptable to discount the loss of critical habitat for Federally-listed threatened species in favor of an outdated mining law? Please explain how weak mitigation of trucking fish around a subterranean tunnel makes up for the loss of spawning and rearing habitat for Snake River steelhead and spring/summer Chinook salmon?

The Endangered Species Act protects Chinook salmon, Snake River steelhead and bull trout. The formal consultation has not begun yet, but the public is not able to comment on the biological assessment so the analysis in the DEIS is the only opportunity for the public to weigh in on important issues. Unmitigated habitat loss for the duration of operations of 20 years plus potentially decades longer if the expansion outlined in the prefeasibility study pans out. Water temperature will increase within the project site and downstream of the project and its analysis area to the detriment of aquatic biota and indirectly the terrestrial wildlife and human health. This project will eliminate the adfluvial bull trout population from the upper East Fork South Fork Salmon River.

There will be habitat loss, reduced fish movement in Meadow Creek and no passage due to Meadow Creek being blocked by the tailings storage facility. Existing populations of all 3 ESA-listed fish and native fish in Johnson Creek, the South Fork Salmon River and its tributaries would be threatened by the high risk of a hazardous material and/or fuel spill along the roadways leading to the mine site, not to mention risk to the Payette River and Salmon River system from highway 55 and 95 mine traffic, which would be substantial and downplayed in the DEIS.

The claims in the DEIS that mining for antimony will decrease the dependence of our country's supply from China are disingenuous. The irony of this falsehood is that the use of this element is completely dependent on its being refined in China. It is extremely unlikely that antimony will ever leave the proposed site as it is uneconomical and dangerous to transport the raw material to Portland, ship across the Pacific to China for

refinement. Please disclose and address the reality of mining for antimony as well as the excess of antimony as a byproduct of gold mining in Nevada currently.

The Forest needs to take a hard look at the analysis done in Chapter 4 with respect to water chemistry, water quality, site-wide water balance, and the stream functional assessment. There are misguided assumptions to be scrutinized in the hydrologic model with are compounded by the complicated use of those results into multiple models such as the SPLNT model.

It appears that the proposed Burntlog route includes passage through the Chilcoot Peak Research Natural Area (RNA) on the Boise National Forest. Currently, the RNA is roadless. Alternative 1 and 2 also show a road open to all vehicles being constructed or widened to 15 feet wide from a trail in the Idaho Roadless Area to the Meadow Creek lookout and beyond to the proposed Burntlog route. How is that road being allowed into a roadless area? It is not for mine access but for the public, yet it won't show up on the travel map. How can that work? I do not understand how road construction through part of the RNA can be compatible with the Forest Service's objectives and management or how a road can be constructed in a roadless area. Please explain the rationale and how this is reconciled with the Boise Forest Plan? It appears as though the Forest is bending all its rules to accompany a foreign company's greed.

The analysis area for the fisheries cumulative effects is inadequate since it does not include any reaches downstream of the confluence with the South Fork Salmon River (SFSR).

Water quantity is a huge concern that is not resolved, yet the lack of adequate water rights are mentioned enough to cause the reader to wonder why this DEIS has been released without proper permit applications submitted to the state and Federal agencies, such as Idaho Department of Water Resources, Army Corps of Engineers, Idaho Department of Environmental Quality, etc.. Mining operations take a lot of water for processing, yet mining in high elevation first and second order headwaters is proposed. Groundwater wells should not be tapped at the levels required to run this dubious operation without informing the public of the dire repercussions downgradient in the aquifer. These are complicated and poorly understood, hidden consequences which need to be better disclosed. There is not enough time for the average public citizen to read, digest and understand the implications of the water balance to be used and abused by this proposed mining plan. Water rights need to be determined before any approval is considered.

Rare wolverines are negatively impacted by roads, which the Burntlog Road is proposed to be developed right through active denning habitat. The aquatic life, fish and the macroinvertebrates that feed them, in Johnson Creek and the East Fork South Fork Salmon River would be threatened by mine traffic alongside waterways. Therefore, Alternative 5, no action, is the only viable solution to eliminate the detriment to fish and wildlife which is a huge draw for those who cherish Idaho and its backcountry. This mine would make this area more front country.

Whitebark pine is on the decline in most of its range, yet this mine proposes to cut live trees thus eliminating Clark's nutcracker and red squirrels of their main diet as well as being non-compliant with Forest Plan standards.

This brings up the Payette Forest Plan standards being violated in more than the 4 amendments proposed for each Forest. The Forest is extremely vulnerable on dozens of standards which would have to be waived or the plans for both Forests would prove ineffective under the National Forest Management Act.

The 2017 Recovery Plan states [Idquo]The high relative increase in abundance for the East Fork South Fork Salmon River population may partially reflect a significant level of direct hatchery supplementation. The latest status review indicates that productivity has decreased in the South Fork Salmon River and East Fork Salmon River populations[rdquo] (U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service. 2017. ESA Recovery Plan for Snake River Spring/Summer Chinook Salmon (*Oncorhynchus tshawytscha*) & Snake River Basin Steelhead (*Oncorhynchus mykiss*) November 2017.

Ongoing supplementation in Johnson Creek exists in this EFSFSR population (Johnson Creek). This program would be adversely affected and the results could be jeopardized by the mining operations proposed. How would this project meet the terms of Forest Service approved portions of recovery plans under the Standard TEST03?

As of October 25, 2020, the 2003 Payette Forest Plan is not available on the Payette National Forest home page under the planning section, there are links to the NEPA documents from the plan revision but the plan itself is not available to the public. This seems to preclude the public from commenting on the project's consistency

with the Forest Plan.