Data Submitted (UTC 11): 9/9/2020 6:00:00 AM
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Comments: We are asking the Forest Service to provide an extension of the comment period for the Stibnite Gold DEIS to 120 days. Our initial review of the DEIS reveals that there will be significant impacts to Native American rights and interests, surface water and groundwater quality, and aquatic species and their habitat, including ESA-listed Snake River Chinook Salmon, Snake River Steelhead Trout, and Columbia River Basin Bull Trout.

Our review also reveals that important references and key supporting documents are difficult to find or missing entirely. Efforts to work with the Forest Service to locate data that should have been included in the DEIS are taking additional time. We also note that several FOIA requests are still outstanding. Furthermore, the lack of page numbers makes it difficult to navigate the document. We note that the normal timing for experts and members of the public to review a project of this complexity and length is 90-120 days long.

There is precedent for the agency in extending comment periods on projects that involve particularly complex environmental analysis or when complicating issues arise. Examples include the Coronado National Forest extending the comment period for the Rosemont Copper Project DEIS for an additional two weeks. The DEIS for that project was only 754 pages, excluding appendices. The Salmon-Challis National Forest also extended the Idaho Cobalt Project DEIS comment 4 period from 60 days to 90 days following extension requests.

Furthermore, there are several key issues that will not be resolved by the October 13 comment deadline for the Stibnite Gold Project. The Idaho Department of Lands is still in the negotiated rulemaking process for Rules Governing Mined Land Reclamation, IDAPA 20.03.02 Docket 20-0000-2000F. These rules encompass the following issues, many of which are directly relevant to the Stibnite Gold DEIS:

* determining surface impacts of underground mines;
* setting fees for reclamation plans;
* incorporating water treatment and post-closure activities in reclamation plans, as needed;
* requiring that all reclamation tasks in a plan be completed and covered by financial assurance;
* estimating actual cost of reclamation and post-closure activities;
* allowing additional types of financial assurance, such as corporate guarantees and trusts; and
* reviewing every plan at least once every five years.

This rulemaking will also address cyanide closure plans, prompted by amendments to IDAPA 58.01.13, Rules for Ore Processing by Cyanidation by the Idaho Department of Environmental Quality.

In addition, the Idaho Department of Environmental Quality is still in the negotiated rulemaking process for Ore Processing by Cyanidation, Docket No. 58-0113-1901. This rulemaking will determine several key issues, including which type of liner system will be utilized for the Stibnite Gold Project. The comment deadline for the negotiated rulemaking ends on October 16, 2020.

Both these rulemakings will determine key project design features. In order to submit informed comments on the

Stibnite Gold Project and its environmental effects, we will need to wait until after the comment periods on these negotiated rulemakings close.

Once again, COVID-19 and the accompanying Forest Service closures and limited capacity continues to substantially interfere with the ability to review and comment by October 13. During scoping, the Forest Service had hosted public meetings in McCall, Cascade and Boise which enabled members of the public to ask subject matter experts specific questions. The Forest Service[rsquo]s Virtual Meeting room and accompanying Story Map, while welcome, are not an equivalent substitute for public meetings.

As such, there is a critical gap between members of the public with specific questions and subject matter experts at the Forest Service, AECOM or subcontractors that could otherwise be addressed during these public meetings. With the lack of public meetings, members of the public need more time and a different forum to connect with these specialists. This could include creating a forum by which the public can submit questions to the Public Affairs Officer who can direct them appropriately and convey responses back to the public or compile sets of similar questions and post them via weekly [ldquo]Questions and Answers[rdquo] updates on the project webpage.

We understand that the Forest Service is under considerable pressure to accelerate project review and approval. However, given the permanent adverse effects to the landscape and watershed if the project is not subjected to a careful review and modified accordingly, (and the fact that the mineral resource is not going anywhere), it is in the public[rsquo]s best interest to extend the public review period.