Data Submitted (UTC 11): 10/15/2020 1:37:30 AM
First name: Jo
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Organization:
Title:
Comments: My name is Jo Kemper, I am an outdoor enthusiast, public lands user, kayaker, and taxpayer. I have a degree in Environmental Engineering, and experience working for public works, specifically in drinking water, and industrial wastewater. I am currently employed by the Oregon Department of Agriculture in Hood River, Oregon. The proposed Stibnite Gold Project is in a wild place that is near and dear to me, because of my personal experiences in the public lands surrounding the South Fork Salmon River.
I'm writing to ask the U.S.F.S. to extend the comment period for the Stibnite Gold Project Draft EIS to the full 120 days. It is long, and requires more time to allow all stakeholders to review the document.
Here are specific reasons this must be done:1) First and foremost, with the continuing increase in COVID-19 cases in Valley County and Idaho and the general circumstances and repercussions of COVID nationwide, it is now even more imperative that the Forest Service grant this request for an extension of the comment period to 120 total days. Commenting on a proposed project is the most significant way that the public can communicate with the agency regarding the potential environmental and community impacts and provide vital information so that the agency can make an informed decision. The importance of public comment to the integrity of the NEPA process and agency decision- making cannot be overstated, and in these unprecedented times, it is crucial to ensure that the public's opportunity to engage in the NEPA process is ensured. Further, some residents of rural Idaho who would be impacted by this project have little or no internet access and as the DEIS is only available online and many libraries and other places of internet access are closed due to COVID, these community members need more time to access and review the document.
2) The DEIS for the Stibnite Gold Project contains an enormous amount of information, much of which has not been readily available to the public. It is unreasonable to assume that 45 days plus the given partial mini-extension is enough time to thoroughly examine and comment on a document thousands of pages long. The full extension of 120 days is needed as a minimum to review the document in a way for citizens to be able to submit substantive comments.
3) Similar mining proposals, such as the Pebble Mine DEIS 2019 (120 days), Rosemont Copper Mine DEIS 2011 (90 days), Idaho Cobalt Project 2007 (originally 60 days but was extended to 90 days in response to requests for additional review time), Thompson Creek Mine MMPO DEIS 2014 (modified mine plan of operations 90 days), have had comment periods at least twice as long.
4) Further, the given comment period does not account for input from citizens who may have had their time/ bandwidth further limited due to life events (such as births and deaths) and/or the extensive amount of natural events (wildfires and hurricanes) that have impacted citizens during the limited given comment period. In order to hear public input, you must account for the true limitations and lack of inclusivity for citizens of different circumstances in the given number of provided days.
5) In the given comment period, there is a lack of acknowledgement that this comment period also falls immediately before the national election, and citizens have limited bandwidth due to personal obligations to engage in political processes. More time is needed to comprehensively review this project during this time of a national election.
6) There is evidence that Midas Gold Corp. and its subsidiary Midas Gold Idaho, Inc. have been pressuring members of the U.S. House of Representatives, other involved federal agencies, state lawmakers, and the USFS to approve this project in an expedited manner. Extending the comment period to 120 days will reassure the public that the USFS values the public's input, and is operating for OUR public lands, not for the benefits of special interests.
Thank you very much for your hard work and for reading this necessity of action in extension of the comment period to 120 days. Please confirm receipt of this message.
Sincerely,Jo Kemper