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Comments: Concerning the SGP, the DEIS is deficient and biased.

Federal law requires that an EIS include:

- 1.description of the action, including its need and benefits;
- 2.description of the environmental setting and areas to be affected;
- 3.an analysis of all environmental impacts related to the action;
- 4.an analysis of reasonable alternatives to the action;
- 5.identification of ways to reduce or avoid adverse environmental impacts.

The Stibnite Gold Project Draft EIS does not meet these standards. The DEIS must be amended to reflect third party unbiased information on the actual average ambient noise level at Warm Lake NSR Site 6 (not the noise on a few of the noisiest days of summer boating season). They must provide measurements of the noise along Warm Lake Road created by heavy trucks, at actual real-life decibel levels, traveling on flat and steep grades, using downshifting and compression brakes. The DEIS must discuss reasonable alternatives to the noise created by these heavy trucks as well as identifying ways to reduce or avoid these impacts (such as using smaller trucks, requiring muffling systems, convoying truck traffic so as to reduce the number of times the environment is impacted by noise, using a different route, like the Salmon River Road or Lick Creek Road for some of the traffic and so forth).

The thousands of recreationists who use Warm Lake deserve to be provided with a complete DEIS that includes a study of the impact of noise due to heavy truck travel on Warm Lake Road. Without this information the DEIS is incomplete and must be amended.

The SGP project has no caps on vehicle traffic, only estimates. As they are essentially building a city, it is foolhardy to not anticipate estimates being below reality, as with any construction project anywhere, let alone in a remote location.

Furthermore, there is an Historic District at Warm Lake that includes cabins and lodges built nearly 100 years ago. Historic districts are impacted by noise and require study prior to the approval of any noise producing projects. In fact Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve throughout the country. If a federal or federally-assisted project has the potential to affect historic properties, a Section 106 review must take place which includes "audible elements that diminish the integrity of the property's significant historic features". This requirement, imposed at the federal level, has not been met by this DEIS. Even with disregard to the federal requirements for inclusion of noise impact on historic districts, there is a duty to the individuals who own and protect historic property. In *Protect Niles v. City of Fremont*, 25 Cal. App. 5th 1129 (2018), a California appellate court found that residents of a historic overlay district had the right to an environmental impact statement that regarded the impact of traffic noise created for a new development proposed near the historic district.

On a practical level, Midas has filed suit against the Forest Service to decline responsibility of mining contamination of water quality. This is of huge concern, considering that most modern mining operations have spills and accidents. The DEIS must be complete and thorough to offer any guidance.

The Forest Service must take a new approach to planning and administration of public lands in light of the unprecedented changes in Forest use since the breakout of the Covid pandemic. Areas which were recently

remote and underused are now in the main mix of Forest use, due to the exploding number of Forest visitors. This trend is irreversible and will continue to accelerate.

The current DEIS does not satisfy mandated requirements nor does it adequately address Forest Service management criteria. The SGP is not worthy of proceeding. I implore the FS stay strong, stay committed to the US citizens and sensitive wildlife species, and do not cave in to this monstrosity.