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Organization: Nez Perce Tribal Executive Committee
Title: Chairman
Comments: The Nez Perce Tribal Executive Committee, the governing body of the Nez Perce Tribe ("Tribe"), requests that the Payette National Forest ("Forest") extend the comment period for the Stibnite Gold Project Draft Environmental Impact Statement ("DEIS") to 120 days.

As you are aware, the Tribe has devoted substantial time and resources evaluating the proposed Stibnite Gold Project ("Project"). The Project is located within the Tribe's aboriginal territory and subject to the rights the Tribe reserved to itself in the Treaty of 1855 with the United States. The Project is also located within an area with intrinsic cultural and spiritual values that are important to the Tribe's identity and perseverance as a people and which Tribal members continue to use and enjoy to this day.

The Tribe's preliminary review of the DEIS indicates that the Project will have significant and irreparable impacts on the Tribe's treaty rights and resources for decades to come. Despite these real and enduring threats, substantial information is missing or inadequately described in DEIS that is both critical to a full evaluation of the Project's impacts on the Tribe's treaty rights as well as the National Environmental Policy Act, the National Historic Preservation Act, and other applicable federal laws.

The Tribe is very concerned that the Forest has not provided sufficient time to allow our Tribal membership to comment on the over 5,000 pages of documents comprising the DEIS. As you are aware, the Forest has unique treaty and trust responsibilities to the Tribe and its membership.

While we acknowledge and appreciate the Forest's government-to-government and staff-to-staff interactions with the Tribe relating to the Project, the Forest also has an obligation to ensure that our membership is fully informed about the Project and has a meaningful opportunity to provide input on it. Unlike other important projects where the Forest has presented information to our Tribal membership during General Council or provided opportunities for Tribal public meetings to solicit input, the Forest did not offer such opportunities for the DEIS.[middot] We certainly understand the enormous and unprecedented challenges presented by COVID-19, but the Tribe would expect the Forest to recognize and be sensitive to these real and pressing limitations by allowing maximum time for full and meaningful Tribal and public engagement on the DEIS.

For these reasons, the Tribe appreciates full consideration of this request that the Forest extend the comment period to 120 days.