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Comments: October 27, 2020
Sonny Perdue
Secretary of Agriculture
1400 Independence Avenue, SW
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BY ELECTRONIC MAIL - Please Confirm Receipt

Re: Request to extend public comment period for the Stibnite Gold Project Draft EIS

Dear Mr. Perdue:
I respectfully request that the public comment period for the Stibnite Gold Plan of Operations Draft Environmental Impact Statement (DEIS) be extended 75 days for a total comment period of 120 days. An extension from the required 45 days for a DEIS under the Forest Service's regulations 36 C.F.R. 215.25(a)(1)(ii) is required in order to provide adequate time to provide meaningful and lawful public participation under the National Environmental Policy Act (NEPA).

The Stibnite Gold Plan of Operations will have far reaching impacts on the environment and the socioeconomics of the communities within Valley County,
Idaho. Public appreciation of the Payette National Forest, the Stibnite area, and in particular, the Salmon River and its tributaries by residents and visitors alike is immense. The South Fork Salmon River is habitat for endangered and threatened species and one of only four drainages in the Columbia basin that supports wild populations of native steelhead. Which is a critical asset to fisherman like myself.

The Stibnite Gold Project is not a project that will be jeopardized by a two-and- a-half month extension of time for the public to have adequate time to review the DEIS. After years of planning, in September 2016, Midas Gold released its PRO. By the January 2020 anticipated release of the DEIS, Midas Gold and the Forest Service will have taken roughly 40 months to complete the
environmental analysis. A longer comment period of 120 days would represent only ten percent of the total time to date taken to prepare the DEIS since the PRO was submitted, and less than two percent of the total expected time the mine will be in operation. Failing to provide an extension of time to comment will defeat NEPA's policy of "[e]ncourag[ing] and facilitat[ing] public involvement in decisions which affect the quality of the human environment. 40 C.F.R. 1500.2(d).

The 45-day public comment under NEPA is statutorily contemplated as the minimum timeframe set apart for meaningful disclosure and public participation. At this juncture, the present situation--the size of the project, the technical complexity, the length of time taken by the Agency to prepare the DEIS, the anticipated voluminous document, and the immense public interest--only strengthens the argument that a 75-day extension of time for public comment is in the best interest of the community and the environment.

Thank you for your consideration of this request that is essential to ensuring meaningful public involvement in the Stibnite Gold Project.

Sincerely,
JD Gaffney