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Comments: I live in Valley County outside McCall in Lake Fork. I am born and raised in Idaho. I am writing to comment on Draft Environmental Impact Statement (DEIS) in regards to the proposed Stibnite Mine Project (SMP).
My concerns and questions after review of the DEIS are extensive and diverse and will be outlined in this letter.

1) Comment Period: The DEIS 5,000+ pages long and took many years to draft with many extensions throughout the process. My hope is the same respect for the drafting period is granted to the public comment period. I am requesting the Forest Service extend the comment to maximum time allowable. The previous 60 day comment period was extended an additional 15 days for a total of 75 days. This timeline in "normal" times would be insufficient to address this massive document but then you add on the current pandemic, unrest and circumstances of our country and our world and it falls short.
As an entity the Forest Service has the responsibility to ensure a proposal of this magnitude receives the inspection, scrutiny and engagement it requires. This fraction of time is insufficient for such a complex project and portrays a lack of these ideals.

2) Consistency with the Forest Plan: Both the Payette and Boise National Forest Plans are proposed to be amended "de-promised" for the SGP include:
- Duration of fish and wildlife degradation
- Total soil resource commitment
- Visual quality
- Water diversions (DEIS Appendix A)
Given the geographical scope and time scale of the SGP this should be a plan level amendment not a project specific amendment. An amendment that covers more than 15 years needs to be under a plan level amendment process.
In regards to the amendment process, certain standards cannot be amended because they are tied into the endangered species act consultations. It is my understanding that the US Forest Service (USFS) doesn't have authority to waive these.
Finally, any waiver of these standards requires disclosure of the effects that the waiver is going to generate. There are no details given in the DEIS of these effects.

3) Economic Impacts:
Laurel Sayers, Midas Gold CEO in the August 20, 2020 letter in the Star News Actions speak louder than words for Stibnite Gold Project noted that SGP " will bring hundreds of jobs into the state and contribute significantly to local and state tax revenue."
Mrs. Sayers also goes on to say that over the time span SGP "we will directly employ more than 500 people and look to hire and purchase locally whenever possible…"
While Mrs. Sayer touts the economic benefits of the SGP the DEIS allude to uncertainty regarding the type and extent of local employment and the type and extent of immigration as noted below.
-4.21-1 High percentage of non-local employees.
-4.21-2 Most employees are expected to continue living in their current locations or choose to relocate to other larger non-local communities outside of the analysis area.
4.21-9 Most employees are expected to spend almost all their earnings at their place of residence. As a result the economic contributions to Valley and Adams counties economies would be limited to income earned by workers that live in the area.
The significant tax revenue highlighted by Mrs. Sayers after reviewed of DEIS appears marginal at most.
Midas will pay no property taxes until after the SGP facilities are completed and the mining operations begin. As

a result construction activities are expected to result in negligible tax revenue benefits for the local area's economy. (4.21-8)
The federal government is expected to receive most of the total tax revenues resulting from operations followed by the state and last Valley County. As a result operations are expected to result in a relatively limited tax revenue increase for the local area's economy. 4.21-26
There are no guarantees regarding local jobs and limited local tax revenue increase for Valley County. The DEIS offers no mitigation to the substantial costs and impacts that will be incurred by Valley County Taxpayers including but not limited to:
1)Local housing which is already in crisis, with greater scarcity of affordable housing and higher prices for real estate.
2)McCall-Donnelly and Cascade School systems
3)Valley County public agencies and service sectors could experience adverse impacts from wage inflation and/or understaffing.
4)Telecommunications and Internet infrastructure may have difficulty in maintaining service because of increased demand.
5)Road infrastructure, traffic and impacts of travel along Hwy 55 and 95 to recreational and scenic corridors and adverse impacts on local communities and tourism/recreation.
6)Waste and sewage treatment.

Lastly, despite describing the dire and adverse consequences of the bust cycle associated with SGP (4.21-31, 4.21-35) the DEIS offers again no mitigations or ideas for reducing the impact of this projected massive disruption to the area's overall economy, residence and businesses.

4) Antimony:
Laurel Sayers, Midas Gold CEO in the August 20, 2020 letter in the Star News Actions speak louder than words for Stibnite Gold Project noted that SGP "greatly benefit the nation itself by providing our first domestic supply of antimony in decades." She highlights antimony as a "critical mineral necessary to our nations security…"
Mrs. Sayers does not note that the reason antimony has not been domestically recovered to date is that it has not been economical to do so. There are no antimony refineries in the United States. According to Midas Gold's Pre-feasibility Study (page 19-1) the only processors with the ability to manage the volume produced at Stibnite are in "Asia." Further, the study states there are no plans for domestic processing to come on line in the near future.
This negates the argument that SGP needs to be mined for strategic or national security. Rather it appears to be an attempt by Midas Gold to exploit a commodity that is neither critical nor strategic with a very large carbon footprint.

4) Hazardous Materials, Garbage and Recycling:
The review of the hazardous material handling and transport brought up the following questions:
-Who on site will be responsible for and insure hazardous materials are separated from community garbage?
-The SGP plans to utilize an off site private location for garbage and waste but also notes in 6.2.10 "Waste bins, dumpsters or trash cages will be provided on site for trash and refuse. This trash material will be regularly picked up and hauled to the Valley County waste transfer station for disposal. Does the county have facilities to deal with it? Have you discussed hazardous waste and garbage disposal with Valley Co.?
-What will you do with the hazardous waste? In the DEIS it is noted "All hazardous waste stored in this facility will be transported to an EPA- approved off-site disposal facility within 90 days." 6.2.10 is this facility located in Idaho and what are the distances required to transport and the route to be taken by these hazardous waste?
-In emissions estimates did you include the emissions from the hauling community and industrial hazardous waste and garbage and portable toilets?
-In regards to recycling the DEIS highlights that "Valley County offers local recycling drop off points in Cascade, Donnelly and McCall for a fee. Recycling may be hauled offsite by the garbage contractor, or by a separate, recycling specific contractor." (8.7.2) Again, has SGP been in touch with Valley County regarding recycling? Who

is responsible for assuring properly sorted and transported? Who bares the cost of this? Recycling has already been a challenge in Valley County with limited economic returns and often ends up in the landfill.

Thank you for your time and consideration.