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Comments: Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Proposed Stibnite Gold Project in Valley County, Idaho, and thank you in advance for your sincerest and most honest consideration of the following comments and concerns. As the comments and concerns in this letter pertain directly to the project and the project area, and specifically point out oversights and omissions of information required and necessary for the public and the Forest Service to have access to in order to adequately assess this project, please consider this a substantive comment letter.

While I am still hoping that you will extend the comment period due to reasons I have outlined in previous comments, in the case you do not, I will use this opportunity to submit a last minute comment regarding the following:

1. Poor Track Record and Lack of Accountability History of Barrick/ Lack of plan for post-project:

It is worth researching the community and environmental-impact record of Barrick, the international gold mining business that is Midas Gold's largest investor. While there are many examples of severe economic, environmental, and social-cultural costs in all of their mines throughout 15 countries, one example is Barrick's Porgera Mine in Papua New Guinea. International reports, such as "Plea for Assistance with Pollution from Porgera Mine" attribute health and environmental problems and a loss of local water rights to Barrick's Porgera Mine in Papua New Guinea, and further reports, including one from Human Rights Watch, report brutal acts of gang rape of women carried out by the mine's security force. The Human Rights Watch report includes a financial summary of the company to put in context the gross financial benefit Barrick mining companies typically gain at the cost of local communities and their environments. In the case of the Barrick Porgera mine, over the span of 20 years, in spite of gross local economic, environmental, and social-cultural costs, the international company grossly benefited, producing 20 billion USD of gold for sales. Barrick's investment in Midas Gold allows it to benefit from the extraction and potentially easily exit after when the time comes for accountability to ensure water quality and environmental, economic, and social-cultural benefits for the local area. What weight does track record hold in analysis and assessment of DEIS and post extraction plans? The proposal significantly lacks a plan for water quality and accountability after the project is completed. Please provide these in a supplemental DEIS for public review.

2. Lack of addressing Migratory Bird and Wildlife impacts

Regarding Wildlife, 1) The project directly and indirectly impacts hundreds of thousands of acres of wolverine habitat as a result of mine activities (Chapter 4.13.2.1.3.2). Wolverines are specially designated, and therefore the DEIS and proposed alternatives need to account for the special designation, and they do not. Please provide this in a supplemental DEIS for public comment. Similarly, the Direct impacts on gray wolves would include and direct/indirect impact to individuals and habitat loss (Chapter 4.13.2.2.4.1).

The Migratory Bird Treaty Act prohibits actions that kill birds on the list of migratory bird species. Executive Order 13186 directs the US Forest Service to protect migrating birds and promote their conservation. In the DEIS, Opinion M-37050 (3.13.2.4) is noted stating that "incidental" takes of migratory birds are not prohibited. In August 2020 the above opinion was rejected by the court. The court stated that it is unlawful to kill birds "by any means whatever or in any manner", including incidental takes.

With this in mind, project actions that kill migratory birds must be readdressed to comply with the court ruling. These include emissions, removal of nest trees, etc. In addition, I was unable to locate a discussion in the DEIS of the effects of arsenic, mercury, etc on water birds that may land on the pit lakes, potentially causing mortality.

3. Recreation Impacts and DEIS Oversight, Omissions, and out of date references

It is noted in the DEIS that the local communities rely heavily on tourism to support their economies" and that "[t]he analysis area is a popular area for a variety of recreation activities on both private and public lands," yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly.

Sources are out of date (many are 2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities.

Idaho's Recreation and tourism generates \$7.8 billion in consumer spending and support 78,000 jobs; 79% of Idaho's residents participate in outdoor recreation; and recreation opportunities is a recruitment tool for businesses used to attract and retain workers (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020).

Recreation and tourism are a big deal locally, state-wide, and nationally and thus, please provide the missing information on impacts to recreation and recreation and tourism economies as related to the Stibnite Alternatives and a management plan and contingencies for the recreation in the area per each alternative.

Specifics from the DEIS

1. In Section 3.4.3.3.17 SOCIAL AND ECONOMIC CONDITIONS, the DEIS notes that "Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies" and yet the Recreation section of the DEIS (3.19 beginning on page 603) does not include any information on the impact the project will have on local recreation.

- Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

2. The cited recreation use on pg. 603 "The analysis area is a popular area for a variety of recreation activities on both private and public lands." A summary statement of the importance and abundance of recreation in the analysis area is provided; however, the entirety of the recreation section does not mention or address how recreation will be impacted by the Stibnite project, nor does it provide recent sources in its descriptions of uses (sources are out of dates, esp. In the context of Idaho's booming population, noting its value of recreation (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please provide information on impacts to economic and social cultural benefits of recreation to local communities and state, national, and international visitors in a supplemental DEIS that can be reviewed.

3. Cited on pg. 615 "Recreation is considered a major use in the Big Creek area of PNF MA 13 (Forest Service 2003a)," is cited using a 2003 reference (17 years out of date). Per the National Forest Management Act and ROS, the FS is required to provide recreation opportunities. As Idaho is currently the fastest growing state in the nation since 2016 and it is noted that current and inbound residents value recreation highly (a motivating factor in their move to this state) (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019), please include and disclose more recent resources for recreation use analysis of this area in a supplemental DEIS in order to inform substantial and informed comments.

a. FURTHER related to more recent data being taken into account is this:

- Recreation is Idaho's outdoor recreation economy generates \$7.8 billion in consumer spending and support 78,000 jobs
- 79% of Idaho's residents participate in outdoor recreation
- Our outdoors are a recruitment tool for businesses used to attract and retain workers
- Areas in the West with protected wilderness, national parks and recreational assets have higher growth rate and higher per-capita income
- Medical savings and improved physical and mental health are associated with outdoor lifestyles (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020)

4. Similarly to the above, cited on page 615 uses sources cited from 2003-2010, which are inadequate and out of date, especially in the context of Idaho's growing population, recreation interests, and general economic benefits

to local Idaho citizens (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please provide more up to date information and analysis. "Recreation users in the analysis area are mostly locals, originating from areas in the analysis area such as Yellow Pine, Warm Lake, Big Creek/Edwardsburg, and areas just west of the analysis area including Cascade and Long Valley (Forest Service 2010).

Users particularly in the western portion of the analysis area also are from populated areas further south including Treasure Valley and Boise (Forest Service 2010). As noted in the Payette Forest Plan for PNF MA 13, though most use is local, "users come through the area from all over the country to use the adjacent Wilderness [FCRNRW], especially during big-game hunting seasons" (Forest Service 2003a)." This section further presents information that needs clarification. Cited local areas such as recreationists being mostly local, but also from the Treasure Valley, Boise, and from all over the country, what effect will the Stibnite project have on these local, Treasure Valley/ Boise/ other Idaho, national and even international visitor's uses? There is no information on impact to visitors or the local tourism economies that depend upon them

5. The purpose of the Valley County Comprehensive Plan is to promote the health, safety, and general welfare of the people of the state of Idaho, and in part, to ensure the protection of "fish, wildlife, and recreation resources" (Valley County 2018). The Valley County Comprehensive Plan also includes a Recreation and Open Space goal "To promote and support a viable recreation and tourism program ..." (Valley County 2018). Objectives include creating improvements for more varied recreation opportunities, promoting development of new recreation facilities when compatible with land use goals, and protecting access to public lands (Valley County 2018).

a. Note of this law denotes local work and law to protect recreation resources in Valley County. Again, the current DEIS does not provide information on how recreation in the area will be impacted and provides out of date sources on current use.

b. Please provide information on impact including economic impacts to these local economies that rely on tourists, per EIS requirements.

c. Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

4. Forest Service Commitment to Best Available Science These stand out in the guiding Principles of the United States Forest Service:

- We use the best scientific knowledge in making decisions and select the most appropriate technologies in the management of resources. This report does not include the best scientific knowledge and therefore is insufficient for comment.

This DEIS does not use the best scientific knowledge and needs to be updated as such.

Thank You for your time and consideration and please provide a supplemental DEIS with a 120 day comment period due to the lack of inclusivity and lack of reasonability for individuals working and enduring life events, especially during COVID to adequately review that document.