

Data Submitted (UTC 11): 10/28/2020 6:00:00 AM

First name: Samuel C.

Last name: Cousins

Organization:

Title:

Comments: These comments are submitted to the US Forest Service on the Draft Environmental Impact Statement for the Midas Gold Project at Stibnite on the Payette National Forest pursuant to the National Environmental Policy Act of 1969, as amended (P.L. 91-190, 42 U.S.C. 4321-4347); and the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508, 1986).

Comment Extension. Thank you for the review opportunity. Thank you for the 15- day extension of the DEIS comment period until October 28. However, the extensive nature of the DEIS, its multiple appendices, the numerous supporting documents on the project website and elsewhere including other agencies' review documents, and the extensive problems needing commenting, all are reasons for a further extension. I request another 30-day extension through November 25, to allow more adequate review time for a quality review of this important and impactful project and its thousands of pages of documentation, consistent with the intent of the National Environmental Policy Act, and the NEPA Regulations (40 CFR 1503.1). Agencies and the public need adequate time to be able to not only to review, but also to prepare intelligent comments in an informed manner. The more problems the DEIS has that require comment, the more time it will take to comment. And there are plenty. Comment period duration needs to reflect not only the volume of documents to review, but also the extent of problems they contain that need correction. Too numerous to mention, a sample of these problems follows.

This is a large and destructive project. Components of the proposed project include: three open mine pits; ore processing facilities; development rock storage facilities [waste rock dumps]; a tailings storage facility [tailings dump]; a water treatment facility; access and haul roads; electrical transmission lines; and multiple other support facilities. The potentially affected area for the proposed project includes approximately 3,500 acres on federal, state, and private lands located in Valley County, Idaho. It involves NFS lands on the National Forests. It is an expansive and complicated project superimposed over a large and complex landscape with long histories and multiple unsolved problems.

In total, the DEIS contains so many problems and inadequacies that need to be corrected, that a Supplemental Draft Environmental Impact Statement is warranted, consistent with 40 CFR 1502.9 (2):

If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a draft of the appropriate portion.

Few projects on the Payette National Forest in recent decades have been so environmentally destructive. A SEIS should be recirculated to the public for a new, extensive review and comment period.

1. Polluted and Poisoned Waters. The DEIS fails to accurately disclose ill! the direct, indirect, and cumulative effects on water quality of the entire Midas Gold Mine project and ill! its connected actions. In the short term, during construction and operation, the project will degrade water quality further, both surface and underground. Then during

reclamation, it will use mitigation measures, both proven and unproven, to try to counteract and remedy the massive damage the mining has caused. The DEIS fails to include enough, and enough proven, mitigation

measures to reverse the severe destructive effects of new mining when added to the century of past mining. The DEIS fails to fully and site-specifically disclose the cumulative effects on water quality of the Midas project, when added to other past, present, and reasonably foreseeable future projects that damage water quality here. The SEIS and FEIS need to.

2. Fish and Habitat loss. The action alternatives have some of their greatest adverse impact on fish, and particularly threatened and endangered fish species: Chinook salmon, steelhead, and bull trout. These are barely hanging on to existence in these headwaters of the South Fork Salmon River watershed. Length of stream removed (10.8 - 31.8 km in action alternatives) is large. Destruction of Chinook habitat (3.3 - 4.2 miles), destruction of bull trout habitat (2.8 - 7.14 miles) projected in the DEIS represent losses of 20% - 70% of present habitat, which are extremely destructive to a critical ecosystem component. Twenty percent of the Critical Habitat for Chinook will be destroyed. Meadow Creek's low flow discharge will be dropped by 78%. Summer stream temperatures would sharply increase. This has ripple effects down the South Fork, down the Salmon, down the Snake, down the Columbia, and into the Pacific Ocean and the Northwest. The DEIS does not adequately capture the full extent of adverse cumulative effects. Here in the Northwest, the resident Orea (killer whale) population is critically endangered, just dozens remaining, dying off because of loss of its predominant food source, the Chinook salmon. These are adverse cumulative effects which are well known. And yet the DEIS fails to disclose these cumulative effects on salmon, or the contribution of the Midas Gold Mine project to these cumulative effects. The project will not recover its local Chinook population, it will degrade it further. This promises to contribute to the extinction of the Chinook salmon in Idaho, and the DEIS is deficient in disclosing this. The DEIS fails to include adequate mitigation measures to reverse the stream channel losses, fish barriers, pollution, sedimentation, and water temperature warming caused by the proposed mining. It fails to restore the struggling Chinook populations. The SEIS and FEIS need to.

3. Net Effects of Over-Optimistic Mitigation Success. The suite of mitigation measures proposed have a very high risk of very low success. The consequences to aquatic and fisheries will be at high risk of being catastrophic.

4. Earthquake Damage Risk. Central Idaho including Stibnite recently experienced this earthquake potential in real life. Let it be a wake-up call. Future earthquakes are not only possible, but reasonably foreseeable, just not on a schedule. Yet the DEIS fails

to adequately analyze earthquake risk here specifically. Examples are damage to pit lakes, steepened pit walls, road fills and embankments, bridges across anadromous streams, roadways, tailing ponds and dumps, hazardous chemical storage facilities, Water Treatment Plant, vehicle diesel and gas tanks, septic and sewage treatment facilities, power transmission lines, and other human facilities. Blowout Creek is one good local precedent of the kind of future damages an earthquake can trigger. The SEIS and FEIS need to analyze this.

5. Polluted Air. The Midas mine project will be a massive polluter of the air for much of its 35 year lifespan. Fugitive dust is an inevitable byproduct of mining and reclamation on this large scale. Health and safety of mine workers and Forest Service and other agency employees will be jeopardized. The DEIS incompletely and superficially address air quality and the site-specific environmental adverse impacts on humans, fish and wildlife individuals and populations, and vegetation in and around the Midas mining area, both direct, and indirect as well as cumulative effects. The SEIS and FEIS needs to disclose specifics.

6. Lost Public Access. The DEIS is not clear and specific on whether and to what degree the general public will lose, or have continued access to, NFS lands within the project area during project development, operation, and reclamation, particularly by season. The visiting, recreating, and business public will lose access to the Stibnite area for decades while the project plays out. As one mitigation, the DEIS Alternative 2 allows a through-road to remain open through the mining complex from Yellow Pine to Thunder Mountain summit. But will this road be

open year-round? In winter, will it be a wheeled vehicle road, or snowmobile route? And what entity will be responsible for the upkeep, maintenance, repair, replacement of this road, and its associated lateral and downstream damages to the environment? Midas? Valley County? The Forest Service? FHA? The SEIS and FEIS need to disclose specifics.

7. Electrical Transmission Line. The Midas Alternative 2 will add a Water Treatment Plant that will require a new and upgraded transmission line into the mine complex from the Johnson Creek substation. The line will require maintenance in a remote, mountainous, high elevation area of burned and falling snags. Winter snowpack in harsh conditions will exacerbate the problem and its costs. Who will patrol and monitor the new line? Who will pay the predictable costs of maintenance and repair?

8. Degraded Recreation Opportunities. The DEIS is not clear and specific on whether and to what degree the general public will retain or lose recreation opportunities on NFS lands within the project area during project development, operation, and reclamation, particularly by season. This includes harvest and collection of forest products. It particularly is deficient in disclosing the degradation of the diverse recreation experiences in the project area and the surrounding area, caused by sights (visual quality degradation) noise intrusion, smoke and dust, reduction in air quality, reduction in visibility, loss of solitude, and opportunities for primitive recreation in the nearby Frank Church-River of No Return Wilderness, and destruction of potential wilderness characteristics in four roadless areas including two most adversely affected, Meadow Creek and Burntlog Roadless Areas. In fact, the Alternative 2 would develop part of the Burntlog Roadless Area by developing the Burntlog Access Road, which

violates the Idaho Roadless Rule, because this new road is "not needed," as defined in the Roadless Rule, but is in fact one of several possible routes outside the specific mining area.

9. Degraded Wilderness Quality and Experience. The Frank Church-River of No Return Wilderness is located just east of the project area. Sights, sounds, polluted air, and other influences from the major Midas mine project will spill over the Wilderness boundary and be perceptible by Wilderness visitors. This will degrade their solitude, primitive recreation, and wilderness experiences in multiple ways. The DEIS does not go into enough detail analyzing and disclosing the true nature and extent of these adverse and irretrievable impacts. The SEIS and FEIS need to more fully and specifically disclose specifics.

10. Plants Destroyed. Special Status Plant losses need to be replaced. Occurrences of seven species of Special Status Plants would be destroyed by the Midas project. Modeled habitat for 11 other species of Special Status Plants would be destroyed. The FEIS needs to add mitigation measures to restore habitat and recover more than 100% of these losses by area of plants and habitat for Sensitive and Forest Watch plant species, within five years of cessation of mine extraction operations.

11. Whitebark Pine Destroyed. Alternative 2 removes 243 acres of occupied whitebark pine habitat (10% of the occupied area in the analysis area). This loss is adverse enough to a species heading toward disappearance, but in addition it will adversely affect bears, jays, nutcrackers, and multiple associated species. It would reduce chance for grizzly restoration. The SEIS and FEIS need to present better ideas than eradicating the 1,000 individual whitebark pines through project modifications, mitigations, or other creative ways. The FEIS needs to add mitigation measures to restore habitat and recover more than 100% of these whitebark losses.

12. Lost Inventoried Roadless Area Character. Midas claims that one of the design features is to "D Minimize or avoid, where practicable, disturbance in designated Idaho Roadless areas." To the contrary, the proposed Project fails significantly in this regard. The project would have adverse effects on four IRAs and adjacent roadless areas by constructing new and expanding existing roads, and in two IRAs, by installing permanent

facilities like waste rock dump and tailings dump areas. Six roadless areas would lose a total of 740 acres to roads, and 524 acres would be lost to rock and tailings dumps. These are irretrievable losses of undeveloped character of the landscape, and irreversible for multiple generations to follow. The SEIS and FEIS needs to explore all possible measures, boundary adjustments, and mitigations to reduce these losses and preserve these IRAs.

13. Transportation and Traffic. City Roads and Traffic. Mining truck traffic will greatly increase and overload some city streets in McCall and some county roads in Valley County (DEIS Chapter 4). But the DEIS overlooks the impacts of these heavy and hazardous trucks on access routes through the city of McCall. Turning and merging truck traffic is likely to cause accidents with local and regional citizens' vehicles. Intersections inadequate for truck passage and turning radius need to be redesigned and rebuilt to new standard, before the project begins, and at the full expense of Midas Gold, not the taxpayer. After all, the DEIS promises that "the mining

and ore processing planned by Midas Gold will incorporate this work into the activities of the proposed Project, at no cost to taxpayers." Appendix G, page G-9. These as well as all such mitigations need to be specific as to the season, specific to the road, and specific to the other forms of traffic including bicyclists, runners, and pedestrians. The DEIS needs to be supplemented with these mitigations. This applies to State, county, and city roads through New Meadows, McCall, Donnelly, Cascade that will or may be used to access the Stibnite area. The DEIS needs to be supplemented to include State Highways 55 and 95, Warm Lake Road, Johnson Creek Road, South Fork Salmon Road, EFSF Salmon River Road, and Lick Creek Road. Employee traffic to and from the Stibnite complex needs to be analyzed over specific routes. Heavy truck traffic will markedly impact road surfaces and accelerate the deterioration of the asphalt surface and in some areas the substrate. Midas Gold needs to pay mitigation fees to both prevent and repair this. And in each case, the degree of effectiveness of each mitigation measure needs to be stated in the FEIS.

14. Toxic and Poisonous Chemicals. Heavy Midas Gold trucks will transport fuel, diesel, propane, cyanide, antimony, and other toxic and poisonous substances. Accidental spills can enter rivers streams and wetlands, and damage and destroy ecosystems. They can expose people to these hazardous substances and threaten human life and health, especially in the more populated cities and towns. And especially in fall, winter, and spring seasons with their snowy and icy road surfaces. It is not a question of if, but when, accidents and spills will occur. The proposed action needs to be supplemented to include site-specific hazardous spill prevention and mitigations for State, county, and city roads through New Meadows, McCall, Donnelly, Cascade that will or may be used to access the Stibnite area. This includes State Highways 55 and 95, Warm Lake Road, Johnson Creek Road, South Fork Salmon Road, EFSF Salmon River Road, and Lick Creek Road. Then the SEIS and FEIS need to fully, specifically, and accurately disclose and analyze specifics.

15. Landfill and Solid Waste. The DEIS often mentions in passing but does not seem to follow thorough and analyze where solid wastes of the mining construction, operation, maintenance, and reclamation will end up, or their secondary environmental effects. The Valley County transfer station near Donnelly? Regional landfills? The DEIS identifies a 4-acre landfill site for non-hazardous solid waste on the minesite, and also states other waste "would be hauled off-site for disposal" (2.3.5.11). But it fails to disclose secondary the effects beyond that. Specifically, what are those wastes? Where would they be disposed of? How much volume at each location, over the 20- year period of operation and closure? And will that exceed any of those sites' capacity at some time?

16. Emergency Services Overwhelmed. The local fire, emergency medical, and law enforcement services are understaffed and underfunded already, and will be seriously overburdened by the mining operations at Stibnite. This will threaten public health and safety of the citizens. The rural fire protection district will be incapable of providing service to Stibnite. Specific problems that Midas Gold has failed to address include: evacuating medical emergency patients from Stibnite, especially in winter and in inclement weather; extrication of accident victims

from wrecked trucks and heavy mechanized vehicles without supplemental rescue machinery; emergency HAZMAT

spill rescue and response; lack of response training; and other health and safety threats. Midas Gold, not the taxpayer, must develop, commit to, and fund the needed mitigations for these problems caused by their Project.

Effective mitigation measures to prevent these problems need to be developed and committed to by Midas before the project can be allowed to commence. Those measures that need to be in place upfront need to be actually in place, not just promised, before the Project can begin. The SEIS and FEIS need to fully disclose this specifically.

17. Leach Liner Leakage. To reduce the leakage of tailings leachfield fluids from the tailings, the proposed project needs to upgrade the older style leach liner it proposes to use to the higher-grade liner that other agencies and independent outside experts recommend.

18. Denial of Tribal Rights. The DEIS acknowledges that the mining project will degrade salmon and other fish habitat, and reclamation will fail to improve it, or even restore it to current levels or for salmon. This will not honor Tribal rights. It will violate the letter and spirit of treaties with Native American Tribes in Idaho legally signed in the 19th Century. The Tribes were and are sovereign nations. They were guaranteed access to their ancestral lands, including the rights to hunt and fish and gather in "all usual and accustomed places" (Nez Perce Treaty of 1955). The Midas project will deprive them of access to salmon that are lost to the project. It will block salmon access to Meadow Creek, and block Tribal access to 3,423 acres in the project footprint, and 13,446 acres of public land within the Operations Area Boundary, reports

the DEIS. The exception is the new public access road through the mine operating area from Yellow Pine to Thunder Mountain summit, but it has multiple limits and restrictions that limit Tribal access. Otherwise, the Nez Perce Treaty of 1855, and the Shoshone Bannock Tribes Treaty of 1868 are violated by the project. And yet, both these treaties pre-date the Mining Law of 1872. Logic and fairness say they should take precedence over the provisions of that later law, and the Tribes should be afforded the rights they were promised by the Federal government in the treaties.

19. Midas Gold Past Track Record. The DEIS did not do a good job of evaluating and disclosing the effectiveness of each of its mitigation measures in the action alternatives, or the total aggregate effect of the total package of mitigation measures under each alternative. Effectiveness of the mitigation measures used is key to environmental consequences, as multiple court decisions have established. One key factor in the criteria for effectiveness is the past track record in applying mitigation. Past is prologue. What has been the track record of Midas Gold Corporation in applying mitigation measures to other mining and construction projects similar to this one? How effective has their mitigation program over the short term, but also the long term such as the 35 year total lifespan of this project's activities? What projects of this size have they completed, and how well? The DEIS does not seem to report this, and the SEIS and FEIS need to do so.

20. Effectiveness of Future Mitigation Less Likely Than Immediate Effects. The overall mitigation philosophy of the Midas proposal tries to portray a degraded present condition as static, to contrast against a conceptual restored future condition. This is an

unequal comparison. It fails to correctly portray the present condition as dynamic, with long-term restoration and natural recovery underway. The Meadow Creek valley floor for example, has decades of restoration completed.

However, the proposed Project would undo much of that by covering it over with spent deposits and create a major open wound on the landscape again. Is it really wise and necessary to rip off the scab and create a new wound there? The analysis needs to project positive trends of the current recovery and restoration situation over time, not just a static current situation. Similarly, from an economic analysis standpoint, the DEIS poses the tradeoff as between actual ongoing recovery now at Stibnite, and proposed recovery ("restoration") benefits in the future. Up to 35 years in the future. Therefore, those benefits will be uncertain. But, the adverse consequences of construction and operation will be real, and near-term. Those costs will be almost certain. Thus, this is an unequal tradeoff, sacrificing present benefits (environmental qualities) today, for uncertain benefits (environmental remedies of damage) in the future. The SEIS and FEIS need to reframe the cost-benefit tradeoff analysis between the two categories of benefits more objectively.

21. Unequal Treatment of Alternatives. NEPA procedures require that all action alternatives in an EIS need and deserve the same treatment in both analysis and documentation (40 CFR 1502.14). Each of the Alternatives 3 and 4 is not developed into adequate detail or specifics to allow an equal comparison with the other alternatives considered in detail: Alternatives 1, 2, and 5. Coincidentally, these are the alternatives that attempt expressly to minimize adverse environmental effects. Essential basic design features are lacking. Why? For example, in Figure 2.5-3, Alternative 3, the existing Thunder Mountain Road just disappears under the TSF and DRSF blankets. Clearly this is not the intent of the Alternative. How will the public drive the road from Yellow Pine through to Thunder Mountain? Off-road it over the tailings? Where would the alternative relocate the road to? Key questions raised, unanswered, MIA in Action Alternatives. This violates the NEPA Regulations, which require a clear comparison to allow "a clear basis of choice" among reasonable alternatives" (40 CFR 1502.14). There are other examples of modifications of the proposed action included in the two alternatives that are lacking specifics, and needing to be developed and disclosed in the SEIS and FEIS.

22. Fish Tunnel A Likely Failure. In short, the EFSR temporary diversion tunnel idea is really wishful thinking. Remote and speculative. A pipe dream. A shot in the dark. This unprecedented idea is not only unproven, but untested. The conceptual tunnel has a low chance of succeeding. Instead, it has a great risk of failing. The consequences of this failure would likely be severe, including an irretrievable loss of Chinook salmon local population up the EFSR. That is not worth the risk. It needs to be dropped from all Alternatives. If not, will the Forest Service require an Adaptive Management Plan to establish clear contingency actions to take in the event the EFSF tunnel diversion does not work as hoped? As the threatened salmon population in the Stibnite area is one of the most important natural values here, and one of the most threatened by Midas' plan, it is logical the tunnel and its effects must be more than conceptual. Therefore, if the Forest Service does not drop this idea, the SEIS and FEIS must reveal the draft AMP in full site-specific detail so that the public and agencies can review and comment on it.

23. Centralized Water Treatment Plant. Midas proposes a new, permanent facility to be built on National Forest land, not private, to be potentially relocated to private some day (2.4.5.6). This is unacceptable. It is unnecessary and unwise to encumber NFS lands, the lands of the people of America, indefinitely, with an engineering facility designed to serve private industry. The Forest Service must not saddle the American people with a permanent attractive nuisance that must be guarded and repaired, and may well be abandoned to the USFS for US taxpayers to handle, essentially forever. This is the historic pattern of past mining abuses on public land, and cannot repeat here.

24. Impossibility of Perpetual Water Quality Treatment. Unlike everything they touch turning to gold, some things cannot be done as if by magic here. There are some things Midas Gold cannot do forever. It cannot operate a water treatment facility that will operate perpetually. It is a logical impossibility. This element needs to be dropped from the Alternative 2 in the SEIS and FEIS, and replaced by a different, time-finite mechanism for preventing and treating runoff and seepage from pit lakes, DRSFs, TSFs, and natural streams, springs, and seeps.

25. Monitoring Responsibility. The SEIS and FEIS must make it clear exactly what entities are responsible for each monitoring throughout the entire 35 year term of the project. In no cases should the Forest Service take on, or assign monitoring responsibility away from, Midas Gold (or its successors) to the Forest Service or other Federal, State, or local agencies or individuals. If there are valid exceptions to this principal, then the Forest Service needs to obtain a full and adequate bond from Midas Gold before operations can begin, to ensure that no public monies are used in the monitoring of this mine.

26. Restoration Without Mining. All action alternatives have the same assumption: first conduct the mining with some mitigation, then reclaim the site with some more mitigation, and plan for improved environmental metrics to result. However, the DEIS lacks and requires a new alternative analyzed in detail in the SEIS. It needs an action alternative of accelerated reclamation of the degraded landscapes without new mining. Midas in its proposed project seems to believe "the "village must be destroyed to save it later." This assumption is false. Instead of the proposed action of superimposing a major new mining complex on top of a badly degraded but slowly recovering landscape, the better and more logical alternative is to continue the present recovery underway and increase restoration actions to help nature take its course. Constructing the new mines and associated facilities are not necessary. They will just aggravate a bad situation and accelerate that deterioration. It will make the subsequent job of site reclamation infinitely more difficult and less likely to succeed. Midas Gold will object and charge that this does not meet their "Purpose and Need." However, if a major part of Midas Gold's purpose and need is truly to "RESTORE THE SITE," as Midas Gold's graphic icon proclaims at the top of each page of its Plan of Operation, then Midas should enthusiastically support it. Or is it just a marketing slogan? An alternative that partially meets the Purpose and Need deserves full consideration. Nothing in NEPA requires that every detailed alternative meets 100% of the Purpose and Need. And very few actually do. Partially meeting it is acceptable. Therefore, the FEIS needs to add this alternative and analyze it in detail. It may turn out to be an--or the-- Environmentally

Preferable Alternative (40 CFR 1505.2(b)). But the Forest Service and reviewing agencies and public will never know unless it shows it.

27. Forest Plan Amendment. The DEIS inadequately handles the attempt to make multiple Forest Plan amendments. The 36 CFR 219 Regulation requires (219.13 (b) (5)):

"(i) The responsible official's determination must be based on the purpose for the amendment and the effects (beneficial or adverse) of the amendment, and informed by the best available scientific information, scoping, effects analysis, monitoring data or other rationale.

(ii) When basing the determination on adverse effects:

(A) The responsible official must determine that a specific substantive requirement is directly related to the amendment when scoping or NEPA effects analysis for the proposed amendment reveals substantial adverse effects associated with that requirement, or when the proposed amendment would substantially lessen protections for a specific resource or use."

It is not clear that the Responsible Official has conducted or documented this analysis, given the brief explanation in Appendix A, Consistency Review and Forest Plan Amendment. Nor has it shown compliance with (219.9):

(1) The responsible Official shall determine whether or not the plan components required by paragraph (a) of this section provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each

species of conservation concern within the plan area."

The SEIS and FEIS need to upgrade the justification for each of the Forest Plan amendments it proposes. But first, the Forest Service needs to take a good hard look at reducing the number of amendments by adjusting the Alternative to conform with the Plan Standards and Guidelines and land allocations. They are in the Plan for very good reasons, especially in one of the most environmentally critical and sensitive areas of the Payette NF.

28. Bias and Conflict of Interest. Midas Gold prepared a significant portion of the documentation for this project. The full extent is unknown because the Forest Service did not clearly delineate which sections it prepared, which portions AECOM prepared, and which sections Midas Gold did. If the Forest Service would identify this, the public would be more fully informed. If the Forest Service abdicated its responsibility to prepare parts of the documents, the reviewing public deserves a chance to know.

29. Erroneous Determination of "Form Letters." Who made the determination of which public comment letters were form letters, modified form letters, or unique letters? By the result of the screening, it appears it was a Midas Gold advocate. Even a cursory look at the Public Reading Room (accessed October 25, 2020) shows major systematic errors in screening many if not most of the letters of comment in the DEIS. From August to October, hundreds of purported "unique letters" were clearly "modified form letters." These were all the same 1 page length, the same page format, all the same font style, all the same font size, the same language style, and all the same points made, just jumbled up in multiple permutations designed to appear unique. Half had no signature

block, just a quick written signature. There was sometimes a page reference or two to help it appear specific. It's as if the proponent printed up hundreds of these similar letters and routed them through their support network and picked them back up and submitted to you the Forest Service in batches. Look at the same document sizes (bytes). Look at the dates of receipt. Large batches. Does this really appear to be several thousand unique letters to you? Yet that is what the CARA database claims. When you try to filter it for "Do not show form letters," look what happens: the system shows you these hundreds or thousands of non-unique letters. It fails to filter them out. However, what it does filter out is long and detailed letters from environmental advocates, for unknown reasons. Is someone or some company gaming the system? Is the CARA system or the Forest Service so inattentive or so malleable that it misses this obvious attempt to "stuff the ballot box?" And that it aids and abets it by screening out substantive environmentalist letters but not form letters from mining advocates?

This basically devalues those who write site-specific comments, and discredits the independence and integrity of the Forest Service, which NEPA and basic honesty require. The Forest Service should be smarter than this. It needs to be better than this. It needs to take over the screening job from Midas Gold, or AECOM, or whoever, now, and redo it to salvage a semblance of a fair and unbiased product that complies with federal law and regulation.

This is one of the most destructive projects proposed on one of its most sensitive parts of the Payette National Forest. It is one of the worst places to approve a mine, especially without full and specific environmental review. Thank you for this opportunity to comment. Yes, "Restore The Site." But without new mining.