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Objection Reviewing Officer
Stibnite Gold Project
USFS Intermountain Regional Office, Rm 4403
324 25th Street
Ogden, UT 84401

Re: Stibnite Gold Project EIS #50516 Objection

As stated in my comment letter (#15161)(January 4, 2023)(pg. 2-3):

Light Pollution
Section 4.19.2.1.1.2 in the DEIS discusses mine site facilities as it relates to operations. "The mine site also would change the landscape character of the night sky by increasing sky glow or light pollution." (DEIS 4.19-14). In late 2017, Idaho's Central Idaho Dark Sky Reserve, one of only two in North America, was established in a 1,416 square mile territory in neighboring Idaho counties (The Washington Post 2020). There aren't many places left to stargaze without the negative effect of light pollution. Idaho's wilderness provides some of the last tourist destinations where the night sky can be enjoyed in all its glory. Based on modeling results, the SGP DEIS describes an emissions plume that would be visible for 63 to 73% of post-sunset nighttime hours (DEIS 4.19-14). The DEIS goes on to say that due to changes in the recreation setting from mine site operations, some visitors may choose to participate in recreation opportunities elsewhere! Is this a mitigation measure? Please elaborate on the implementation of Midas Gold Idaho, Inc. and Forest Service mitigation measures specific to lighting that 'could' reduce sky glow (DEIS 4.19-15).

Nez Perce Tribe Treaty Land
The Nez Perce Tribe (NPT) Department of Fisheries Resource Management (DFRM) is responsible for operating, maintaining, and analyzing data associated with the SFSR among many other watersheds in Nez Perce ancestral homeland. The locations of many of these important fisheries monitoring activities are located directly along proposed hauling routes associated with the SGP. Not only that, the SGP is entirely within the tribe's aboriginal territory. Critical and sacred resources, like Chinook salmon in the upper East Fork of the South Fork of the Salmon River have already been extirpated by past mining operations. As managers of treaty-reserved resources, the Nez Perce Tribe has committed an incredible amount of time, money, and resources to the recovery and restoration of resources within this sacred area and the SGP would undoubtedly undermine this decades long effort.

In response to my comments, the FEIS at Appendix B-745 responds:
No further response required. General in nature or position statement. It is acknowledged and understood that concerns regarding potential long-term environmental impacts, ecological integrity, and the well-being of potentially affected communities are valid and important to consider. During the decision-making process, the Forest Service will seek to identify the best possible balance between environmental protection, community needs, and sustainable forest management.

This is inadequate because according to the FEIS on page 1-32, (1.11 Changes from the SDEIS to the Final EIS) there is no reference or adequate response to comments specifically regarding light pollution or Nez Perce tribal land treaties and rights. My comments are still valid and nothing changed from the SDEIS to the FEIS. The

search term 'tribal land' shows up only three times in the comments (19396, B-271) and nowhere in the comment responses. In fact, that comment response specifically stated: No further response required.

The Forest Service must withdraw the FEIS and DROD and not issue any decision or take any action based on the inadequate FEIS. The FEIS and DROD must demonstrate full compliance with law, regulation, policy, Treaty, and requirement noted. The Regional Forester must withdraw the FEIS and DROD with instructions to the Payette National Forest to correct errors noted before taking any action.