

January 4, 2023

Linda Jackson  
Forest Supervisor  
Payette National Forest  
500 N. Mission Street, Building 2  
McCall, Idaho 83638

Re: Stibnite Gold Project Supplemental DEIS #50516

Dear Linda Jackson,

My name is Audrey Hopkins and I am a full-time resident of Valley County, Idaho. For my family, Valley County encompasses the image of wildness. We consider ourselves stewards of this rugged and complex landscape and the flora and fauna that have lived here long before humans arrived. We understand that mining has a prominent place in the history of this area. Mining scars are visible today within the potentially affected area described in the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Stibnite Gold Project (SGP). The mine site is located in the East Fork South Fork Salmon River (EFSFSR) drainage basin (SGP SDEIS Figure 1.5-1). I have many concerns about the inevitable detrimental impacts of the SGP and the many issues that were overlooked and not addressed within the SDEIS. There are many justifiable reasons for the US Forest Service to select the 'No Action Alternative'.

Citizens, states, tribes, and governments have a responsibility to look after our National Forests. In 2018, Idaho and the U.S. Department of Agriculture (USDA) signed a historic agreement to improve forest health. Part of the strategy is said to "continue to focus on reduction of fuels and wildfire risk to communities, improvement of forest health and watershed conditions ([US Forest Service 2018](#)). I support and appreciate this kind of interagency collaboration, especially when it comes to protecting, preserving, restoring, and wisely managing our forests and grasslands as part of the overall mission of the agency ([US Forest Service 2020](#)). The Valley County Comprehensive Plan, revised in November 2018, includes as part of its purpose to, "ensure the protection of fish, wildlife, and recreation resources" ([Valley County 2018](#)). I value the opportunity for public comment and the careful consideration by the US Forest Service in preparation of the Final Environmental Impact Statement (FEIS) on the SGP. The 'No Action Alternative' best minimizes adverse environmental impacts on the National Forest System (NFS) and negates the significant issues identified throughout the SDEIS put forth by Perpetua Resources Ltd.

My interest in the EFSFSR drainage basin began about 15 years ago when I worked in the area assisting with the installation of instream Passive Integrated Transponder (PIT) Tag Detection Systems as part of the Integrated Status and Effectiveness Monitoring Program ([ISEMP](#)). ISEMP was established to implement a regionally standardized in-stream monitoring program that created tools to help inform agencies for management decisions about habitat and ESA-listed fish populations in the Columbia River basin ([ISEMP 2018](#)).

I was involved in some of the site selection for this project and there is an understanding that, “you don’t go to Yellowpine without a chainsaw!” The area is remote, it takes hours to drive from Warm Lake Rd. near Cascade to Yellowpine, Idaho.

The site selection phase of the project was intensive as the agencies involved assessed the most appropriate and scientifically constructive monitoring locations within the Secech, South Fork Salmon, and East Fork South Fork Salmon River reaches. The permitting process was daunting with complicated and restrictive conditions required to minimize impacts under the National Environmental Policy Act ([NEPA](#)). Reading through the SGP SDEIS makes me cringe, especially considering the rigorous permitting process conservation based projects face.

In addition to working on fisheries monitoring and research projects in the SF Salmon River area, my family recreates here. We find solace and comfort in these remote lands away from the reach of development, cellular coverage, and traffic.

There are many features of the SGP SDEIS that I find deeply concerning. As a public land owner, I trust that the Forest Service will very carefully consider the alternative that minimizes adverse environmental impacts while operating within the standards of existing Forest Plans. The need for specific amendments for the SGP project (SDEIS Table ES-1, ES 3-6) only reinforces the reason these plans exist in the first place! A recent article in the October issue of High Country News titled Grand Disjunction by Paige Blankenbuehler predictably states..land that could be managed for recreation, wildlife or conservation will end up under the control of energy companies. At best, it will remain idle, but be inaccessible to the public. At worst, it will be immediately developed and directly contribute to greenhouse emissions in a world that is already nearing the critical threshold for the climate crisis ([High Country News 2020](#)).

### **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. The SDEIS claims irreversible losses to all fish species (SDEIS pg. 4-386) and admits that effects include “take’ of listed species and some effects will be long-term and permanent (SDEIS Section 4.13.4). Gold mining is a sensitive topic for indigenous tribes including the Nez Perce Tribe. Historical treaties grant exclusive use of the land and water by tribal people within territories. Emmit Taylor Jr. with the Nez Perce Tribe described the land and water as ‘Natural Capital’. Resources are collected at all elevations during all times of the year. This connection to and engagement with the land is integral to the well being of Nez Perce peoples. The important restoration work within this

watershed by NPT and other agencies is being done to remedy past wrongs by mining activity. Continued improvement and protection of water quality in this area can only be accomplished by opposing the SGP.

### **Critical Habitat Damage and Loss for Fish and Wildlife**

The SDEIS indicates that the Forest Service has preliminarily determined that the SGP will adversely affect bull trout, Chinook salmon, steelhead, and their critical habitats (SDEIS 4.13.4). This is inevitable in and around the mine site, what about additional detrimental impacts that will occur downstream? And how far downstream does the SDEIS account for? Why has the SGP proposed a Forest Plan amendment to, “Suspend the requirement of new surface diversions to provide upstream and downstream fish passage within the footprint of mining operations (SDEIS Appendix A)? The SDEIS modeling indicates that arsenic, antimony, mercury, and other metals will contaminate water for many years to come. Uncertainty and lack of model sensitivity were noted regarding hydrologic models but developing alternative models was dismissed as unrealistic (SDEIS 4.8). The No Action Alternative is the only alternative that wouldn't result in further loss of habitat for fish and wildlife.

### **Light Pollution**

Section 4.20.2.2 in the SDEIS 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.” (SDEIS 4-568). 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. The SDEIS goes on to say that impacts would be reduced by implementing lighting design features, including directing lights downward, and shielding where appropriate (SDEIS 4-568). Who decides what levels of light pollution are appropriate or when long-term visual contrast to the landscape is acceptable?

### **Rising Water Temperatures and Carbon Emissions**

In 2017, the Congressional Review Science (CRS) determined that “..federal agencies need to consider the impacts that their proposed actions would have on greenhouse gas..emissions and climate change.” (Executive Order 13783 172-173). Complete analysis should be conducted to assess the amount of greenhouse gas emissions associated with the SGP proposed mine compared to the existing state of the site. For every ounce of gold produced in 2019, mines emitted an average of 0.8 tonnes of CO2 ([S&P Global](#)). And open pit mines emit about 2X as much CO2 (per ounce of gold) as underground mines! Do you think it's morally responsible that the SGP would increase Valley County's emissions by 800% while the world faces the effects of climate change? Rising water temperatures as a result of climate change are estimated to impact as much as half of the suitable habitat of coldwater fish in North America if global temperatures increase by 8 degrees Fahrenheit ([Land Trust Alliance 2020](#)). Why isn't the factor of increased water temperatures due to climate change not included or even acknowledged in calculating increased water temperatures as a result of SGP?

### **Hazardous Materials & Mine Generated Waste Disposal**

Where will hazardous waste, industrial garbage, and trash be disposed of? What is the plan for recycling recyclable materials generated by the mine and associated mine activities? Valley County already struggles with basic recycling and waste management for residents. The proposed transportation routes for shipments of hazardous and toxic materials, fuel, and explosives encompass many miles of backcountry roads, crucial Idaho highways along Idaho rivers, and directly through the towns of Cascade and McCall and beyond. The SGP may cause accidental releases of hazardous materials or wastes, including diesel fuel, gasoline, lubricants, antifreeze, chemical reagents and reactants, antimony concentrate, mercury, lime, explosives and other substances during their transport, use, storage or disposal (SDEIS pg. 2-140). Please provide analysis of the potential effects of spills on Idaho roadways and in our towns including detailed clean-up plans. There is a serious lack of information about traffic beyond Highway 55/Warm Lake Road. Where will reagents, waste, reaction products for the mining operation be coming from and going to? What are the effects on local services? What about non-compliance, who is accountable when spills and accidents occur?

### **Impacts on Recreation, Economy, Local Resources**

Idaho is among the fastest growing states in the nation and in the midst of a population boom ([Census.gov 2017](#)). Idaho's population growth exceeds available housing. From 2010-2019, housing increased by 7.8% while the county population grew by 15.5% in Valley County ([Idaho Department of Labor 2020](#)). McCall is already dealing with pressure to our utilities including a proposed cap on new sewer hook-ups ([The Star News 2020](#)). Many residents from cities experiencing increased growth recreate in the mountains of Idaho. Highways 55 and 95 are essential corridors connecting the Northern and Southern reaches of Idaho. The enormous disruption we experienced just last year after a huge rock slide on highway 95 is just one example of the increased danger and congestion our highways face. How will the SGP proposal affect tourism, recreation, and related economic benefits to local communities? Why is there no mitigation plan in the SDEIS to account for additional affordable housing, telecommunications infrastructure, and impact on our hospitals and school systems? What direct impacts will the SGP have on local recreation?

As stated previously, I appreciate the opportunity to provide comments regarding the proposed SGP especially as it does not appear to be an opportunity afforded to everyone. Unfortunately printed copies of the SDEIS were not made available to the public so that everyone who wants to can participate in this process. The documentation associated with the SDEIS for the SGP is lengthy and not easy to interpret. We are also still in the midst of a worldwide pandemic and it seems many are unwittingly left out of this important process.

In preparation of the Final Environmental Impact Statement (FEIS), I request that the Forest Service honor Payette and Boise National Forest Plan standards. Please, carefully consider the short and long-term consequences that gold mining in this area will have on our community, our land, and our future and select the 'No Action Alternative'.