

TO: Linda Jackson, PNF Forest Supervisor  
SUBJECT: Stibnite Gold Project SEIS  
FROM: Nicolette Humphries, McCall, ID

January 8, 2023

To Whom It May Concern:

I am a 45 year resident of McCall and as a kayaker and river runner, have spent considerable time in most of the Salmon drainages and subsequent tributaries. I have come to recognize the unique pristine quality of this river system and am very concerned about the impact of the Perpetua Stibnite Gold Project on this delicate and fragile East Fork/South Fork area.

We know this country is defined by steep rugged canyons and sandy granitic soil prone to erosion. It's known for frequent wildfire episodes and subsequent winter avalanches that send debris to temporarily dam rivers. It's been deeply impacted over the years by road building and timber harvests. And yet, it hosts a unique population of hardy Bull Trout, Chinook Salmon, Steelhead Trout and Westslope Cutthroat.

### Fish

Chinook Salmon, Steelhead Trout and Bull Trout are federally listed as threatened under ESA and Westslope Cutthroat is a FS sensitive species. The SDEIS states the SGP will adversely affect Bull Trout (Sec. 6.3.3), Chinook Salmon (Sec. 6.3.1), Steelhead Trout (Sec. 6.3.2) and their critical habitats; and may indirectly impact Westslope Cutthroat (Sec. 6.3.4). Chinook Salmon habitat will be reduced 20.8-26% and critical Bull Trout habitat reduced 27.5-69.5%, significant for these threatened species. (SDEIS pg 4-386).

The SGP plans to block off access to their spawning beds in Meadow and Fiddle Creek and alter migration patterns by creating a tunnel fish will be required to travel through, with very limited study to determine the tunnel's viability. Fish will also be affected by water temperature increases potentially fatal in the summer to perpetuity. (SDEIS pg. 2-146, 4-280). The rising temperature data does not include adjustment for rising temperatures due to warming associated with climate change). Water quality is expected

to exceed accepted levels for antimony, arsenic, copper and mercury indefinitely post-closure, again potentially lethal for fish populations.

How will this affect other animals and people who drink the water?

Swimmers? Kayakers?

Will these rising temperatures affect evaporation and lead to drying conditions and an increase in wildfire in the region?

### Waterfowl/Migratory Birds

I volunteer for a local wildlife rehabilitation sanctuary in McCall and have seen an increase in lead toxicity in Bald Eagles. I'm concerned how the population of Bald Eagles and Osprey in the Warm lake area, along the SF Salmon and at the Johnson Creek site will fare when feeding on fish and carrion exposed to the aforementioned heavy metal contaminants. The Migratory Bird Treaty Act prohibits actions that kill birds on that list. Any SGP actions that cause these bird's destruction must be addressed. These include water contaminants, removal of nest trees and habitat reduction.

### White Bark Pine Habitat Destruction

In the 2021 MMP, White Bark pine removal and habitat conversion associated with SGP would impact seed production, dispersal and establishment of this species. Can we afford to allow this when 50% of this tree in the Northwest has disappeared due to a combination of blister rust, mountain pine beetle, extensive fire activity and lack of regeneration? 259 acres of White Bark Pine habitat would be lost and approx. 1236 existing trees cut. US fish and wildlife has listed white bark pine as endangered under the ESA. It's illegal to cut live or dead white bark pine, why should Perpetua be allowed to kill 1236 of these trees essential to the survival of so many species: Clark's Nutcrackers, Idaho Northern Ground Squirrel and Black Bear just to name a few.

Wolverines, Canadian Lynx, Fischers, Elk, Deer, Black Bear, Grey Wolf, Mountain Lion, Pine Martens and all other species who will lose their habitat

I have volunteered to place cameras and analyze the subsequent pictures for the McCall Fish and Game office over the last few years. Recently, I was assigned a camera labeled: Burnt Log. I was amazed to see the amount of wildlife on that camera. Way more than I had seen on any other on the PNF, and I've looked at pictures from cameras forest wide. There were several pictures of wolverines. Wolverines are experiencing loss of habitat due to warming temperatures and the specificity of their denning sites. Not nearly enough analysis has been conducted on the impact of the SGP on this elusive and threatened animal. The SDEIS says impact on Wolverines by the SGP is Major, assessing habitat loss in the 3000-3300 acre range.

Wolverines are just one species that will be affected by habitat loss should the 2021 MMP be implemented. Ungulate and other animal populations that will experience loss of summer habitat due to the 14+ miles of new construction of Burnt Log Road bordering the Frank Church Wilderness, along with its promise of increased erosion and sedimentation into Meadow Creek, the Middle Fork of the Salmon and beyond. The SGP plans for avalanche mitigation for this road appear questionable at best.

I regularly backpack in the Frank Church Wilderness, accessing it from Monumental Summit, Big Creek and Profile Gap. I don't relish the idea of dodging large mining trucks to access that area for the next 20+ years. I see this as dealing a huge blow to tourism in this area. The increase in dangerous traffic from these mining trucks heading north and south on Hwy 55 or 95 needs to be addressed by an analysis, as they are crucial corridors for recreation and tourist traffic. (SDEIS pg 5034)

McCall has recently had record increases in numbers of tourist visits. Will this project generate more jobs and more Valley County/Idaho State tax revenue than if we were to promote recreation in this area and encourage people to visit and enjoy this beautiful pristine backcountry? Not restrict access with Mining activity, degrade the beauty, chase all the wildlife away?

As someone who regularly visits and recreates in the area that will be affected forever by this Gold mining project, I am grateful for the opportunity to comment on the SGP SDEIS.

Thank you for your work and consideration.

I am in favor of the NO ACTION ALTERNATIVE.

Nicolette Humphries  
McCall, ID