January 7, 2023

Ms. Linda Jackson

Forest Supervisor,

Payette National Forest

500 N. Mission Street

McCall, ID 83638

linda.jackson@usda.gov

Re: Submission of Evaluation of the Socio-Economic Impacts of The Proposed Stibnite Mine as comments to the US Forest Service regarding the SDEIS.

Dear Ms. Jackson:

The Idaho Headwaters Economic Study Group, IHESG, was formed by a coalition of over 50businesses in Valley County. The primary reason the group was formed was that many in the local business community and the public in general were not comfortable that the potential socio-economic impacts of the proposed Stibnite Gold Project, (SGP), had been adequately analyzed or explained in the DEIS. The objective of the IHESG was to have a fully independent and impartial study conducted concerning the impacts of the proposed SGP and what effects it will have on the sustainability and greater good of our community, our way of life and our business climate.

Using funds donated by a broad swath of Valley County's local business community and citizens the IHESG contracted with Power Consulting (Missoula MT), to conduct the study. The study is entitled: An Evaluation of the Potential Socio-Economic Impacts of the Proposed Stibnite Mine on Valley County, Idaho (DEC 2022). Here after referred to as the “Power Study”.

The SDEIS should have taken a hard look at the potential socio-economic impacts from the proposed SGP. Based on the results of the Power Study that hard look did not occur in the SDEIS. In fact, the Power study states, “**Specifically, we find that the DEIS and the SDEIS socioeconomic sections presented a ‘benefits only’ analysis”.** (Section II, page 1 of the Power Study Executive Summary).

The SDEIS states in Section **4.21.1,** page **4-593** that “Social and economic conditions were analyzed using the Economic Impact Analysis of the SGP (Highland Economics 2018). It is important to note that this study was conducted for Perpetua Resources by the consulting firm Highland Economics. In the Executive Summary of that study, it clearly states **“we did not evaluate potential economic impacts due to possible effects of the SGP on other economic activities, such as the recreation or tourism industry”.** This obviously reinforces the Power Study observation that the SDEIS presented a “benefits only analysis “. Furthermore, the analysis in Section l. of the Power Study provides data and details for how **“Valley County’s productive economy is built around visitors and the recreation experiences they seek”.** The Power Study goes on to demonstrate how the proposed SGP will put this robust economy at risk and how the SDEIS does not take a hard look at these risks.

An important topic that is relevant to the SDEIS which is covered by the Power Study in detail is the mining and processing of antimony as part of the proposed SGP. Perpetua Resources is currently making a strong public relations campaign based on the presence of antimony at the Stibnite mine. The campaign highlights the use of antimony for national defense and green energy technology. Helping to fuel this campaign are recent actions taken by the Federal Government including recent Executive Orders issued by the Biden Administration as well as the DOD award of almost $25 million to Perpetua Resources to assist in the mining of antimony. The Power Study outlines in detail the reality of what will actually happen with the mining and downstream processing of the antimony. Because of the obvious influence of the Federal Government in this aspect of the proposed SGP the Forest Service should pay special attention to Section 4.2 of the Power Study.

IHESG believes that the Power Study is particularly relevant to the following sections of the SDEIS. However, there are also overarching issues in the Power Study such as transportation and potential spills that may be relevant to other sections of the SDEIS.

Sections ES-21, ES-26, ES-27, ES-28 & ES-29 of the EXECUTIVE SUMMARY

Subsections 3.16, 3.18, 3.19, 3.20 & 3.21 of Section 3.0 AFFECTED ENVIRONMENT

Subsections 4.16, 4.18, 4.19, 4.20 & 4.21 of Section 4.0 ENVIRONMENTAL CONSEQUENCES

Subsections 5.16, 5.18, 5.19, 5.20 & 5.21 of Section 5.0 CUMULATIVE EFFECTS

The IHESG has found that the Power Study provides a great amount of detailed information regarding socio-economic impacts of the proposed SGP which is either missing or inadequate in the SDEIS. Therefore, we are submitting the complete Power Study to the Forest Service as an inclusive set of comments to the SDEIS. We feel it is imperative that the Forest Service review the Power Study and takes it into strong consideration for any decisions it makes regarding the proposed Stibnite Gold Project.

Idaho Headwaters Economic Study Group

Steering Committee,

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