

January 9, 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 Jared Hopkins and I am a full-time resident of Valley County, Idaho. The Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed open-pit, cyanide-leaching Stibnite Gold Project (SGP) by Perpetua Resources needs to be redrafted. There are many unanswered questions and legitimate concerns that need to be addressed. Responsible residents of Valley County and beyond look to the US Forest Service to make the responsible decision on behalf of the people, plants, and animals that inhabit and recreate in the South Salmon River. Please reject this project and select 'No Action Alternative'.

One concern as a public land owner is access to the recreational areas I use throughout the year. *"Recreation opportunities within the Operations Area Boundary would be eliminated until after reclamation."* SDEIS 2-160. It shocks me to read that 14,000 acres will be closed to recreation for 20 years. The preferred Proposed Action, the Burntlog Route, borders the Frank Church Wilderness Area. There are multiple ESA Listed wildlife species within the South Salmon River Basin. The proposed gold mine would displace wildlife while disturbing and damaging critical habitat. The analysis only includes five miles from any SGP feature. Why wouldn't a greater footprint be included in the analysis? This is clearly much too narrow a scope and ignores the greater inevitable impact beyond five miles from SGP features.

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). "The 2021 MMP would have direct permanent impacts on water quality, as it would contribute new sources of mine waste material to the East Fork SFSR drainage." (SDEIS ES-18). What about additional detrimental impacts that will occur downstream? 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.

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? 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?

As a Valley County resident, I appreciate the opportunity to provide comments regarding the proposed Stibnite Gold Project. Please honor Payette and Boise National Forest Plan standards and consider the serious and detrimental, and long-term consequences that gold mining will undoubtedly have on this precious, fragile and important Idaho ecosystem, select the 'No Action Alternative'.

Sincerely,

Jared Hopkins
McCall, Idaho 83638