

# Comments on the Stibnite Gold Project SDEIS

January 9, 2023

I am concerned that the action alternatives proposed for the mine will severely degrade water quality and quantity, fish and wildlife habitat, recreational opportunities, wilderness characteristics, socioeconomic and visual values, and long term soil productivity. I am not convinced that a reasonable alternative to accomplish the purpose and need for this project has actually been developed and analysed. Proposing a massive cyanide leach gold mining operation, which would double the area of land disturbance at the site, from 1,593 to 3265 acres, including the excavation of three open pits, and generate an estimated 400 million tons of additional mine waste that will remain on the landscape in perpetuity and creating a permanent source of potential pollution within the watershed, is hardly a restoration project.

Several deficits in the SDEIS analysis are apparent:

- **A proper range of alternatives has not been considered.** The SDEIS only considers the mine applicant's proposed mine plan. Why is there not an alternative developed that proposes a project within the environmental constraints of the current forest plans and environmental laws? Or an alternative within the existing disturbance footprint? Or one that backfills the pits constructed?
- **The SDEIS analysis fails to describe mitigation that adequately protects against or mitigates impacts as required by the FLPMA and the Organic Act.** The SDEIS often makes lists of potential mitigation but little actual science on the how that will occur is demonstrated.
- **Benefits to the community are overstated.** In fact, the Idaho Headwaters Economic Study Group found that:
  - Any mine employment economic "benefit" could be almost completely wiped out by even a 2% decline in the visitor-recreation and nonlabor income sectors, due to degradation of natural amenities.
  - The taxes paid by Perpetua will not come close to offsetting the infrastructure burden. We can say with certainty that the fiscal benefits are likely to be small, and that the costs to Valley County from the mine workers are largely unknown. The only "local" fiscal benefit to Valley County is \$300,000 in annual property taxes once the mine is active. This will not cover the increased cost that the mine will impose on Valley County.
  - Over its lifespan, only 8% of total mine spending will happen in the local area and only 5% will go directly towards wages for the workers who are modeled to live there. If, as we suspect, most of the workers will not actually live in the area, this small percentage of local worker wages shrinks even further to a meager 2-3%.
  - Public lands with natural amenities play an important role in Valley County's economy. If the natural environment and world class fisheries are degraded, then economic vitality in Valley County may suffer. A failure in the 400' TSF would require a decades long cleanup to restore the rivers and other resources. The resulting stigma, especially to the recreation and visitor industries would be devastating.
- **The SDEIS lacks sufficient information to demonstrate that the proposed discharge from mine operations complies with the requirements for the CWA 404 b(1) Guidelines.**
- There appears to be **no basis for the Payette/Boise Forest plan amendments** with regard to consistency with relevant CFRs. The proposed amendment does not meet the requirement for ecological sustainability for air, soil, and water. 36 C.F.R. § 219.8(a)(2). The SDEIS claims that amendment 1 "retains the plan components to maintain or restore these resources" (SDEIS Appx. A). The SDEIS does not demonstrate that the plan amendment meets this requirement as there are long-term predicted impacts to water quality and fish habitat during operations and post-closure.

**The Stibnite Gold Project will affect aquatic and watershed resources beyond the management areas proposed for Amendment 1.** Anticipated impacts cannot reasonably be limited to those management areas proposed for this amendment. Therefore, predicted degradation will occur will beyond the mine site project area and into the analysis area that is described in the SDEIS which encompasses the entire EFSFSR and upper SFSR. Chapter 4 of the SDEIS only analyzes effects to fisheries or water quality at the mine site area; it fails to analyze consequences of the project to fisheries and surface water quality in the larger analysis area downstream and outside of the local mine site.

If this project is about “restoring the site”, as Perpetua claims, **why does the Forest Service need to significantly amend the two Forest Plans to allow for indefinite degradation of aquatic, soil, watershed, terrestrial, and visual resources, and blocking of fish passage?** The amendments proposed are for the life of this project only. That timeframe is identified as a minimum of 20 years, not including indefinite water treatment, monitoring, exploration, and maintenance of mitigations. The SDEIS (Appendix A) states “impacts to aquatic, terrestrial, and watershed resource conditions would be expected to occur for the length of the proposed SGP.” This statement is in direct conflict with the disclosed effects in the SDEIS, which state that the detrimental and significant environmental effects of this project will persist well beyond the stated 20 years. The SDEIS’s assertion that “[t]he proposed plan amendment maintains the intent of the original plan standard” is not even possible given the degradational impacts from the mine. The SGP must meet the Forest Plans’ Aquatic Conservation Strategy, which is to maintain or improve the conditions for those species. However, it is unclear how the Forest Plan Amendment 1 could ever comport with the Aquatic Conservation Strategy given that the SGP’s effects on these resources will last for at least 100 years.

- The reclamation that is described makes **unsubstantiated assumptions about revegetation of new ground disturbance**, which includes, road building, tailing piles, pits, etc., The descriptions of “restoration” that include planting and soil amendments (manure?) are inadequate to regain soil productivity and grow ground cover or trees.
- The proposed mine is predicted to **harm the traditional lands of indigenous peoples**, such as the Nez Perce Tribe, including harm to treaty rights, such as preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe’s salmon restoration efforts.
- The Forest Service disclosed that the mine **would be a source of new mine pollution to the EFSFSR watershed, requiring water treatment after closure to intercept this pollution**. The Forest Service stated that since the groundwater is already contaminated in much of the project area, additional contamination from mining activities would not be that noticeable. Cyanide-leach gold mines tend to be chronic polluters, approximately 74% of modern U.S. gold mines resulted in surface or groundwater pollution, despite predicting otherwise. It’s a dismal track record when considering the future of such an important watershed and the EFSFSR.
- The analysis predicts that mining operations could reduce flows in the East Fork South Fork Salmon River upstream of Sugar Creek by as much as 24.8% during operations, this will compound with climate changes already documented (lower flows, reduced snowpack, and hotter summers) and **result in lethal temperature increases for fish**.
- **The SDEIS Fails to provide mining claim data that demonstrates valid existing rights.**

**Don’t approve the mine as it is proposed in this SDEIS! Pick the No-Action alternative or revise the SDEIS to require development of additional alternatives and that actually addresses the substantive issues brought up by my comment letter and the comment letter submitted by Save the South Fork Salmon,**

**Idaho Conservation League, Earthworks, Idaho Rivers United, Center for Biological Diversity, American Rivers, American Whitewater and Winter Wildlands Alliance.**

Respectfully Submitted,  
Leigh Bailey

A handwritten signature in cursive script that reads "Leigh Bailey". The signature is written in black ink and is positioned below the typed name.