January 10, 2023

Linda Jackson,

Payette Forest Supervisor

Stibnite Gold Project

500 N. Mission Street, Building 2, McCall, Idaho 83638

Re: Comments on the Stibnite Gold Project Supplemental Draft Environmental Impact

Dear Forest Supervisor Jackson,

I am submitting these comments on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the Payette National Forest. I appreciate the opportunity to comment.

As residents of Grangeville, Idaho, my family and I live, work, and recreate in and around the South Fork of the Salmon River and in the communities that will be impacted by the Stibnite Gold Project.

We value the South Fork Salmon River watershed and surrounding area for activities such as fishing, hunting, hiking, camping, biking and ecological studies that rely on clean water, intact ecological processes and a pristine environment.

It is critical that the South Fork Salmon River watershed be protected so that it continues to provide habitat for Endangered Species Act listed Chinook salmon and steelhead, and facilitates bull trout recovery efforts. These and other aquatic species, as an integral part of the watershed ecosystem, make the South Fork Salmon such an amazing place in central Idaho.

The South Fork Salmon is a major tributary to the second longest free-flowing river in the lower 48 states, the Wild and Scenic Main Salmon River. Most of the South Fork Salmon and many sections of its tributaries have been deemed eligible and suitable under the Wild and Scenic Rivers Act by the U.S. Forest Service. It continues to boast critically important spawning habitat for migratory fish. Recognizing this importance, federal agencies, tribes, and other organizations have expended significant efforts to improve the ecological health of the watershed. The South Fork Salmon watershed is a cornerstone in ongoing efforts to restore threatened Chinook salmon and steelhead to Idaho.

The proposed Stibnite Gold Project (SGP) is a massive cyanide leach gold mining operation proposed on federal public lands at the headwaters of the South Fork Salmon River watershed - an area that has already been impaired by past mining activities. The proposed mine would double the area of land disturbance, from 1,593 to 3,265 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 - creating a permanent source of potential pollution within the watershed.

The ecological destruction wreaked by the proposed project will not provide an appreciable quantity of any rare or critical resource. The proposal will rely on the extraction of gold. Gold is not in short supply in the US or world and is used primarily for manufacturing jewelry, a non-essential luxury for affluent persons. Further, significant quantities of gold are stockpiled that could be used for more critical manufacturing purposes for many decades to come.

The Stibnite Gold Project has generated significant opposition in Valley County and throughout Idaho because of its proposed location directly on top of the headwaters of a major tributary to the South Fork Salmon River, and the unavoidable environmental, social, and economic risks it poses to the ecosystem and local communities.

The permitting process for the proposed Stibnite Gold Project has been substantively delayed by Perpetua Resources (formerly Midas Gold), which has repeatedly failed to provide accurate and timely information, and made repeated and fundamental changes to the mine plan midway through the National Environmental Policy Act (NEPA) process.

Midas Gold/Perpetua rushed a series of unfinished proposals out for public review in the DEIS, and the permitting process was delayed as a result. The SDEIS suffers from some of the same issues. The SDEIS is missing fundamental information necessary to an informed analysis, including:

● basic engineering specifications and analysis of the tailings storage facility,

● sediment modeling,

● details and analysis of proposed underground exploration (Scout Prospect Tunnel),

● detailed reclamation plans.

Furthermore, 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 should reject the proposed mine plan because it:

* Conflicts with the Payette and Boise Forest Plans
* Fails to minimize all adverse environmental impacts as required by the Federal Land policy and Management Act and the Organic Act
* Fails to demonstrate compliance with the Clean Water Act
* Conflicts with established Treaty Rights
* Fails to demonstrate compliance with the Endangered Species Act
* Fails to provide mining claim data that demonstrates valid existing rights
* Lacks key information necessary for an informed public review under NEPA
* Fails to consider climate change and incorporate climate change within model projections
* Considers only the mine applicant’s proposed mine plan, failing to consider a reasonable range of alternatives as required by NEPA.

As a result of these serious deficiencies, I urge the Forest Service to select the “No Action” alternative, and pursue timely clean up of legacy pollution. This is the only option that protects the watershed from more expansive harm from large scale cyanide leach gold mining.

Thank you for your consideration.

Pat Finnegan

Principal Investigator and Consultant

Natural Resource Protection

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