

Dear Linda Jackson, Payette Forest Supervisor,

My name is Allison Fowle, and I'm a resident of Boise, Idaho. I have spent significant time in the area of the Stibnite Mine over the past several years to recreate as a hiker, backpacker, and angler, as well as to learn more about Perpetua Resource's proposal to mine for gold and antimony. I have toured the site twice with Perpetua Resources in my capacity as a high school teacher, bringing students to the mine in order to help them form their own opinion on the issue. In doing so, I've spent countless hours researching the mine, interviewing stakeholders and experts (ranging from Perpetua representatives, to Nez Perce Tribe members, to hydrologists, to journalists, and more). Through this process of vigorous exploration and information seeking, I have become concerned about several aspects of the SDEIS, a few of which I will describe below.

First, however, I'd like to comment on fundamental issues with the SDEIS and the process being undertaken thus far. Under NEPA regulations, "reasonable alternatives means a reasonable **range** of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action." NEPA also requires the USFS to "... Rigorously explore and objectively evaluate all reasonable alternatives....." 40 CFR § 1502.14(a). With only one action alternative to the actual mining project presented, the SDEIS does not comply with this requirement, as the mining plan is the same for both action alternatives. I ask that the Forest Service consider alternatives that reduce the project footprint, respect Nez Perce Treaty rights, require the filling of all mining pits, require dumping of waste rock exclusively on private land, and that fully comply with the forest plans for the Boise and Payette National Forests.

These mining plans should also directly address the possibility of early closure, as Perpetua Resource's plan is decreasingly profitable as the project continues, and a drop in the price of gold would likely lead to a temporary or permanent cessation of mining before restoration objectives are completed.

Questions/concerns:

- Why are there no project-specific spill risk calculations for numbers of spills, and spill probability, in the SDEIS?
- Why was Highway 55 through Boise, McCall, and New Meadows, nor Highway 95 North, not considered in any transportation analysis?
- How can this plan do more to address emissions and climate impacts? The greenhouse gas emissions from the proposed mine will effectively double the emissions per capita in Valley County.
- How will Perpetua Resources access the mine site in the event of avalanche or closure on the Burnt Log Route? Will they be allowed to use the South Fork Road
- How does the Forest Service plan to minimize illegal motorized access into the Frank Church Wilderness via the Burnt Log Route?
- How does the Forest Service plan to minimize disturbances from noise, light, and air pollution into the Frank Church Wilderness?

- How will the Burnt Log Route be closed and reclaimed upon the closure of the mine?
- How will the culture and backcountry character of the area be impacted by mining and the construction of the Burnt Log Route?

Because of these concerns (and dozens of others), I urge you to select the no-action alternative. Thank you for the opportunity to share my thoughts about the project.

Sincerely,

Allison Fowle