

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Executive Summary	1	ES-6	Agency Preferred Alternative	3	PRII	Recommend that the Agency Preferred Alternative should also cite improved fish access and habitat, consistent with our comments in Sections 3 and 4 of the SDEIS as well as the Specialist Report.
Executive Summary	2	ES-8	Environmental Impacts; Geological Resources and Geotechnical Hazards; Topography	2	PRII	<i>"Each of these pits would also be backfilled with development rock to a certain degree which would bury certain portions of the open pits and their highwalls."</i> Please note the West End Pit would not be backfilled.
Executive Summary	3	ES-10	Environmental Impacts; Climate Change	7	PRII	<i>"Closure and reclamation activities under the alternatives could reduce climate change impacts by improving soil quality and implementing best management practices during all phases of the SGP."</i> Please revise to add <i>"..soil quality, planting trees in riparian areas, and implementing.."</i>
Executive Summary	4	ES-11	Environmental Impacts; Soils and Reclamation Cover Materials; Detrimental Disturbance	4	PRII	<i>"The DD activity area is the area within the transmission line ROW that would be subject to vegetation clearing only and is estimated at up to 500 acres. It is estimated that SGP-related vegetation clearing could initially result in DD as high as 16 percent of the ROW but would more likely be somewhere between 8 and 15 percent."</i> Recommend noting that the additional ROW impacts are due to a request from IPCo due to recent fires in California.

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Executive Summary	5	ES-12	Environmental Impacts; Soils and Reclamation Cover Materials; Quantity and Quality/Suitability of Reclamation Cover Materials	1	PRII	"Under the 2021 MMP there would be approximately 278 acres of unreclaimed pits/highwalls." This total appears to include 13 acres of project -related surface disturbance reclaimed as ponds (Stibnite Lake and Midnight Pond). Please revise or clarify, if applicable.
Executive Summary	6	ES-14	Environmental Impacts; Hazardous Materials	1	PRII	"Though the Burntlog Route includes a greater number of stream crossings , the Johnson Creek Route includes greater proximity to water resources ." The other information in this paragraph and further sections of the SDEIS indicates that Johnson Creek Route has more stream crossings. Please reconcile.
Executive Summary	7	ES-14	Environmental Impacts; Surface Water and Groundwater Quantity	3	PRII	"Dewatering of the pits would lower groundwater levels in the alluvial and bedrock formations during the mining and post closure periods and would reduce flows in local surface water streams that receive groundwater discharge." There will be no post-closure pit dewatering; therefore, groundwater levels in proximity to the pits will recover during closure. Please replace " mining and post closure periods " with " mining period "

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Executive Summary	8	ES-14	Environmental Impacts; Surface Water and Groundwater Quantity	4	PRII	<p><i>"The TSF and TSF Buttress proposed to be located in the Meadow Creek valley would lower groundwater levels and permanently remove six delineated wetland areas within the footprint of the TSF and TSF Buttress . The permanent reduction in local groundwater levels would be due to the installation of liner and cover systems over these facilities to inhibit meteoric recharge leaching through the mined materials. "</i> Recommend clarifying for the reader that the loss of these wetlands will be offset by the creation of new wetlands on top of the TSF during reclamation and closure.</p>

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Executive Summary	9	ES-15	Environmental Impacts; Surface Water and Groundwater Quality	2	PRII	<p><i>"Compared to existing conditions, project operations are predicted to increase temperatures in West End Creek and the East Fork SFSR below the Yellow Pine pit area ."</i></p> <p>Please include also a summary of instances where temperatures would be decreased:</p> <p>P.4-337: <i>"Water temperatures in the warmer summer and fall months in Meadow Creek downstream from East Fork Meadow Creek substantially decrease relative to the baseline conditions during mine operations and closure/reclamation activities (Mine Year 6 through Mine Year 18), though there is an increase at Mine Year 27, which then continues to decline until Mine Year 112."</i></p> <p>P.4-337: <i>"The East Fork SFSR between Meadow Creek and YPP experiences decreases in summer maximum water temperatures relative to baseline conditions. There is a slight increase in temperatures, still lower than baseline, after Mine Year 22 once the low-flow piping along the TSF is removed, and temperatures continue to decrease once the revegetation efforts take effect."</i></p> <p>P.4-357 to 4-358; <i>Table 4.12-6: All Temperature WCI changes are negligible or beneficial (i.e. temps remain relatively consistent or drop) for all stream segments across the life of the project.</i></p>
Executive Summary	10	ES-15	Environmental Impacts; Surface Water and Groundwater Quality	2	PRII	<p><i>"...while formation of the West End pit lake raises temperatures in West End Creek. "</i> West End Creek is not a flow through feature of the West End pit. Please revise.</p>

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Executive Summary	11	ES-15	Environmental Impacts; Surface Water and Groundwater Quality	2	PRII	"...predicted temperatures return to existing conditions over a period of approximately 100 years ." Please clarify that this time period only applies to the stream reaches on the TSF. In the EFSFSR below YPP, stream temperatures are near or below baseline by EOY12. In Meadow Creek downstream from East Fork Meadow Creek, temperatures substantially decrease relative to the baseline conditions during mine operations and closure/reclamation activities. Temperatures in the EFSFSR above YPP are similar to or below baseline through out the project.
Executive Summary	12	ES-15	Environmental Impacts; Surface Water and Groundwater Quality	3	PRII	"Surface water quality also could be impacted by increased sedimentation associated with mining activities, access road construction and use, and the construction and maintenance of required utilities, with the greatest potential for in-stream impacts occurring during times of higher overland flow." This statement is contradicted by Chapter 4 conclusions (included below) which state the potential for increased sediment associated with roads outside the mine site, but likely reduction to sediment within the mine site thanks to restoration of Blowout Creek in EOY -1. Please revise this statement to be consistent with the effects analysis conclusions. P.4-341: "With the application of sediment reduction BMP's and surface runoff minimizing design techniques, the impacts of sediment in surface water to fish are predicted to be measurable but not severe, limited to the mine area, and occur during the active mining period. However, the restoration efforts in the EFMC would result in a substantial decrease in sediment input into Meadow Creek and the East Fork SFSR. "

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Executive Summary	13	ES-16	Environmental Impacts; Surface Water and Groundwater Quality	1	PRII	"However, 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 ." Please replace " would " with " could " as planned active water management should prevent this.
Executive Summary	14	ES-16	Environmental Impacts; Surface Water and Groundwater Quality	2	PRII	"Despite analysis area improvements to water quality as a result of the removal and reclamation of legacy mine wastes, exceedances of the most stringent water quality standards (including both human health and aquatic life) for water column antimony, arsenic, copper, and mercury are anticipated. " Please qualify this statement with information regarding where and how long exceedances may occur. This statement appears to contradict the statement on pg ES15 regarding As, Hg, and Sb concentrations being "comparable to or less than the existing condition s."
Executive Summary	15	ES-16	Environmental Impacts;Wetland and Riparian Areas; Loss of Wetland and Riparian Areas	7	PRII	"The 2021 MMP and the Johnson Creek Route Alternative would result in the same loss of 120 wetland acres within the mine site focus area (approximately 28 percent of the 429 total acres of wetlands within the SGP analysis area) and 619 acres of riparian areas. " This is the first mention of this area of analysis and is only used in the Wetland and Riparian Areas discussion. Please consider including a map as it is important in validating the impact numbers in the remainder of this section. For example, without knowing how the mine site focus area and the off-site focus areas are defined, this number (120 acres) and the off-site focus area number (76.3 acres) combined for a total project impact of 196.3 acres, which is considerably more than what PRII's wetland ledger indicates as direct impacts (145.4 acres). Please review and revise, if needed.

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Executive Summary	16	ES-17	Environmental Impacts;Wetland and Riparian Areas; Impacts on Wetland and Riparian Functions	3	PRII	"Both action alternatives would have direct permanent impacts on water quality due to contributions of new sources of mine waste material to the East Fork SFSR drainage. " Please replace " would " with " could " as planned active water management should prevent this.
Executive Summary	17	ES-18	Environmental Impacts;Fish Resources and Fish Habitat	2	PRII	"For fish and aquatic habitat, the important factors involve the removal and placement of barriers such as the Yellow Pine pit and TSF/TSF Buttress (which affect species differently), the modifications in surface water management and flows at the mine site, fish access through the East Fork SFSR tunnel, and stream channel restoration effects on stream temperature . " Please also include effects on habitat .
Executive Summary	18	ES-18	Environmental Impacts;Fish Resources and Fish Habitat	3	PRII	"However, stream temperatures are increased in restored stream channels until revegetation establishes to provide riparian shading for the streams. " Please be specific. Maximum stream temperatures would largely decrease or remain roughly unchanged for most reaches during operations and closure. Increased maximum stream temperatures would occur on the TSF (Meadow Creek upstream of Blowout Cr) for the life of the project and in the EFSFSR downstream of the YPP barrier for the 7 years between removal of the YPP pond and the proposed creation of Stibnite Lake.

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Executive Summary	19	ES-19	Environmental Impacts; Fish Resources and Fish Habitat	3	PRII	"Following closure and reclamation, the overall net effect from the SGP would be a net increase in available habitat; however, flows and temperatures make the additional habitat less optimal ." The WCI analysis shown in Table 3.12-17 and Table 4.12-6 show that temperature WCIs are FR under baseline conditions and either do not change or slightly improve at all WCI-scale reaches. Temperature WCIs remain FR as a result of SGP. Please revise.
Executive Summary	20	ES-19	Environmental Impacts; Fish Resources and Fish Habitat	4	PRII	"Effects for trout species differ from Chinook salmon following closure and reclamation, as there would be a net increase in both the quantity and quality of habitat for steelhead trout and net decreases in both quantity and quality of habitat for bullhead trout and westslope cutthroat trout." Net decrease for bull trout is a result of 8.5km of thermally suitable habitat removed from the equation despite reporting generally lower stream temperatures, and despite having 8 metrics evaluated as 4 beneficial, 2 negative, and 2 negligible. Net decrease for cutthroat trout is incorrect as noted in Ch 4. Given 6 criteria evaluated, 4 were reported to have a benefit and 2 with negligible change; one could reasonably expect that would equate to increased quality and quantity of habitat not decreased. Please revise this passage.

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Executive Summary	21	ES-19	Environmental Impacts; Wildlife	5	PRII	"The 2021 MMP and Johnson Creek Route Alternative would remove an estimated 3,266 acres and 3,096 acres, respectively, of wildlife habitat, including habitat for Canada lynx (194 and 175 acres, respectively), wolverine (2,342 and 2,005 acres, respectively), northern Idaho ground squirrel (63 acres), Monarch butterfly, Region 4 sensitive species and management indicator species, Idaho species of greatest conservation concern, general wildlife species, big game species, and migratory bird species and bald and golden eagles ." Please provide the basis supporting this statement. Please see additional comments on Wildlife sections of Chapters 3 and 4.
Executive Summary	22	ES-19	Environmental Impacts; Wildlife	5	PRII	"The 2021 MMP and Johnson Creek Route Alternative would remove an estimated 3,266 acres and 3,096 acres, respectively, of wildlife habitat, including habitat for ...northern Idaho ground squirrel (63 acres)" Please clarify for the reader that this is modeled habitat and there are no observed NIDGS in the analysis area.
Executive Summary	23	ES-23	Access and Transportation	2	PRII	"Even though upgrades to Johnson Creek Road and Stibnite Road would be made, these roads would still have many curves and slopes." Recommend clarifying this statement to reflect that either mine access route would be upgraded to a design standard (width, curvature radius) to meet specific design criteria (WB-50, WB-67) to accommodate the vehicles that would traveling on them. Provided in RFAI-79.

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Executive Summary	24	ES-23	Environmental Impacts; Access and Transportation; Public Access	5	PRII	"To continue providing OSV access to Landmark , a 10.4-mile groomed OSV route between Warm Lake and Trout Creek Campground on Cabin Creek Road would be created as part of the 2021 MMP along with a parking area, resulting in a new winter access facility that would be maintained by Valley County." This route doesn't lead to Landmark. Please include discussion about the segment from Trout Cr. Campground to Landmark.
Executive Summary	25	ES-23	Environmental Impacts; Access and Transportation; Safety and Emergency Access	6	PRII	"For the duration of the SGP, the increase in total volume of mine-related vehicles, specifically heavy vehicles or trucks, on the Yellow Pine and Burntlog routes would result in an increased risk for accidents occurring between public and SGP-related traffic due to the one-lane constraints during construction, for passing slower moving vehicles, and degradation of the road with more frequent heavy vehicle travel." Please replace " Yellow Pine " with " Johnson Creek "
Executive Summary	26	ES-28	Environmental Impacts; Recreation	1	PRII	"In addition, under the Johnson Creek Route Alternative, the Johnson Creek OSV route would be longer (up to Wapiti Meadow Ranch) ." Under the JC route alt, OSV access would be cut off to Wapiti Meadow Ranch between Trout Cr campground and Wapiti Ranch from construction through closure. Please correct.

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Chapter 1 - Purpose of and Need for Action	27	1-8	1.6.1	1	PRII	"However, the agency will need to evaluate the eventual applications for rights of way to make a final determination." Recommend removing this passage as inapplicable to a Purpose and Need statement. It should be deleted in the Final EIS. Likely only the IPCo powerline additions and upgrades off-site on NFS lands will be the subject of rights of way applications or amendments under 36 CFR 251 as a third party connected action. As recognized elsewhere in this SDEIS, the remainder of the SGP included in the 2021 MMP, including access roads on NFS lands, will properly be the subject of review and approval of the plan of operations under 36 CFR 228A.
Chapter 1 - Purpose of and Need for Action	28	1-10	1.7.1	1	PRII	"All functions, work, and activities on NFS lands in connection with prospecting, exploration, development, mining, or processing of mineral resources and all uses reasonably incident thereto, including roads that are constructed and maintained in connection with development and mining of mineral resources, are operations authorized by the U.S. mining laws (36 CFR 228.3(a))" - Here and wherever else this sentence may appear in the SDEIS, consider revising "authorized by the U.S. mining laws" to "within the scope of 36 CFR 228 subpart A" to more closely track the text of 36 CFR 228.3(a).
Chapter 1 - Purpose of and Need for Action	29	1-10	1.7.1	Footnote 4	PRII	Consider adding reference to the 2016 amendment of the 2012 Planning Rule here, which clarified/refined direction for Forest Plan Amendments.
Chapter 1 - Purpose of and Need for Action	30	1-11	1.7.1	2	PRII	Consider adding "as amended" after the reference to 36 CFR 219.13 here.

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Chapter 1 - Purpose of and Need for Action	31	1-15	1.10.1	6	PRII	"Significant issues are those which are used to formulate alternatives to the Proposed Action and to develop mitigation measures. " Please provide additional information from chapter 2 about which issues were used to develop which alternatives and mitigation measures, particularly in the 2021 MMP.
Chapter 1 - Purpose of and Need for Action	32	1-15 through 1-26	1.10.1	Global	PRII	Issues and indicators identified are not consistently used throughout the summary tables, the affected environment or the environmental consequences. While all the resource issues and their indicators should be made consistent with the other sections, it is particularly problematic in Tribal Rights and Interests, Wetlands and Riparian Resources, Access and Transportation. Please review how issues and indicators are used in the whole SDEIS, and make the list here consistent with lists in Chapter 4 sections and with various areas of Chapter 2.
Chapter 1 - Purpose of and Need for Action	33	1-27	1.10.3	2 (bulleted list)	PRII	"NEPA regulations require the agency to identify and eliminate from detailed study those issues that are not significant or that have been covered by prior environmental review, to narrow the scope of the analysis. Reasons for eliminating issues from detailed study include when the issues are related to the following: <ul style="list-style-type: none"> • General opinions or position statements not specific to the Proposed Action; • Items addressed by other laws, regulations, or policies; • Items not relevant to the potential effects of the Proposed Action, or otherwise outside the scope of this analysis; and/or, • Items that have no or negligible effects. " Please provide a citation for this list.

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Chapter 1 - Purpose of and Need for Action	34	1-27	1.10.3.1	3	PRII	"This is dismissed from consideration because making or amending law is an explicit function of Congress and not within the authority of the Secretary of Agriculture, or the Forest Supervisors. " Recommend adding: " Also, it is addressed by other laws, regulations, or policies. "
Chapter 1 - Purpose of and Need for Action	35	1-27	1.10.3.2	4	PRII	" 36 CFR Part 251 Land Uses " - Recommend that the transmission lines be specifically addressed in this response, to clarify why 251 does not apply to that part of it. Special Use Authorization are mentioned in Table 1.7-2. This is made more of a focus because the transmission line would require forest plan amendments.
Chapter 1 - Purpose of and Need for Action	36	1-27	1.10.3.3	5	PRII	" Executive Orders " Recommend clarifying that this issue was also not considered in detail because it is an opinion or position statement not specific to the Proposed Action.
Chapter 2 - Alternatives Including the Proposed Action	37	Global	2.2	entire section	PRII	All the alternatives discussed in detail and dismissed would benefit from identifying which issues were considered when developing the alternatives. In particular, all the environmental design features and mitigation measures would be enhanced by including the significant issue.
Chapter 2 - Alternatives Including the Proposed Action	38	2-1	2.2.2	entire section	PRII	" Alternatives Screening Criteria " - Most of the "significant issues" listed in 1.10 are addressed through the development of the environmental design features, agency mitigation measures, and Stibnite Gold mitigation measure. These are key and major components of the alternative development that we recommend be described briefly here.
Chapter 2 - Alternatives Including the Proposed Action	39	2-2	2.2.2	2	PRII	" Options not meeting the purpose and need (Section 1.6) were documented and eliminated first " Please describe which options do not meet the purpose and need. They are not described in the cited Section 1.6 as the citation indicates.

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Chapter 2 - Alternatives Including the Proposed Action	40	2-2	2.2.3	6	PRII	"The No Action Alternative provides an environmental baseline for comparison of the action alternatives. Under the No Action Alternative, the mining, ore processing, and related activities under the action alternatives, including removal of legacy materials, would not take place. However, existing, and approved activities (i.e., approved exploration activities and associated reclamation obligations) would continue.... " It may be helpful to add a sentence clarifying ASAOC activities to this paragraph. Also, approved exploration activities are not guaranteed to continued; please change "would" to "could".
Chapter 2 - Alternatives Including the Proposed Action	41	2-6	2.2.4	Table 2.2-1, P. 2-6, Row 3	PRII	"• road road maintenance facility " - Recommend clarifying that the location of the maintenance facility is different between the alternatives, as reflected in Table 2.2-1.
Chapter 2 - Alternatives Including the Proposed Action	42	2-7	2.3	2	PRII	"Under the No Action Alternative, the Plan would not be approved and no mining, ore processing, or related activities would occur, including removal of legacy materials (i.e., SODA and Hecla heap leach) included in the Plan. " Please insert after " heap leach ": " restoration of stream channels, and enhanced riparian plantings " included in the plan .
Chapter 2 - Alternatives Including the Proposed Action	43	2-10	2.4	Figure 2.4-2	PRII	"*** The East Fork South Fork Salmon River Tunnel would only be utilized as a contingency to manage high flows upon completion of the restoration of the East Fork SFSR across the backfill in the Yellow Pine Pit ." The annotation on the EFSFSR Tunnel is incorrect. While true for a specific period of time during reclamation of the YPP, it is not an applicable notation to this figure which includes the mine site layout. Please remove.

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Chapter 2 - Alternatives Including the Proposed Action	44	2-13	2.4.4.1	2	PRII	<p>"Trees, deadwood, shrubs, and slash would be removed, and any remaining vegetation would be grubbed using a bulldozer. The resulting material would be chipped and stockpiled for use as mulch or blended to create a growth media additive. After vegetation removal, growth media would be salvaged and stockpiled. Stockpiles would be stabilized and seeded."</p> <p>Suggest replacing these sentences with: "Trees, deadwood, shrubs, and slash not needed to construct windrows at the edge of BLR disturbance (to function as sediment barriers), would be chipped, and suitable soil will be separately salvaged and stockpiled (except for a small portion that will be 'live handled') for use as part of site reclamation and restoration. Portions of the salvaged soil will be blended with the chipped wood to create growth media. All growth media placed in stockpiles would be stabilized, seeded, and mulched to protect the stockpiles from wind and water erosion."</p>
Chapter 2 - Alternatives Including the Proposed Action	45	2-16	2.4	Figure 2.4-4	PRII	<p>In legend: "Warm Lake area OSV connector" and "Warm Lake to Landmark OSV trail"</p> <p>These are not included in the project data and not depicted on the figure. They appear to be duplications of OSV routes labeled appropriately.</p>
Chapter 2 - Alternatives Including the Proposed Action	46	2-82	2.4.7.1	4	PRII	<p>"Approximately 37 percent of the reclamation would be completed concurrent to mining and ore processing; remaining reclamation activities would be completed during closure." The Soils and Reclamation Cover Material Specialist Report, Table 2-7, row two, includes the statement: "Approximately 46 percent of the SGP reclamation would be done concurrent to mining...". Please reconcile.</p>

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Chapter 2 - Alternatives Including the Proposed Action	47	2-89	2.4.7.8	2	PRII	"The transmission line ROW and associated access roads would be recontoured to match surrounding topography and revegetated. " Please replace " to match " with " to blend "
Chapter 2 - Alternatives Including the Proposed Action	48	2-90	2.4.7.12	6	PRII	"Perpetua would manufacture growth media material using screened fines from glacial till sources, available mulched vegetation, and off-site composted material from private lands. " Please delete " screened " and replace " mulched " with " chipped " for accuracy.
Chapter 2 - Alternatives Including the Proposed Action	49	2-94	2.4.9	3	PRII	"This has led to an internal evaluation of project design features and operational characteristics that may have the effect of reducing and/or eliminating potential environmental impacts of the SGP. " Please add in " and address significant issues identified in Section 1.10.1 ".
Chapter 2 - Alternatives Including the Proposed Action	50	2-94	2.4.9	4	PRII	"The environmental design features (EDFs) beyond regulatory requirements that have been proposed and committed to by Perpetua are listed in Table 2.4-13. " Please add " to address significant issues identified in Section 1.10.1 "

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Chapter 2 - Alternatives Including the Proposed Action	51	2-94	2.2.4	Table 2.4-12, Table 2.4-13, Chapter 4, Specialist Reports	PRII	<p>The presentation of Tables 2.4-12 and 2.4-13 (and similar smaller tables in resource sections of Chapter 4 or Specialist Reports) is somewhat confusing: Table 2.4-12 includes Forest Plan guidelines, design features with regulatory basis, and design features with no regulatory basis listed. It is unclear who developed the stated Design Features, even if a regulation is listed.</p> <p>Table 2.4-13 includes additional proponent proposed design features intended to reduce or avoid environmental impacts that do not include any citations of regulatory basis. We believe the intention of these tables is to separate the features that are required by USFS or another agency (Table 2.4-12) from those that Perpetua has proposed without a regulatory impetus (Table 2.4-13). This is a good goal, and could be better achieved if the first table had a very clear regulatory basis for each entry, and if both tables included citation document for the description of the features (i.e. Forest Plan, Perpetua MMP documents, etc).</p>
Chapter 2 - Alternatives Including the Proposed Action	52	2-98	2.4.9	Table 2.4-12; 1st column, 2nd row	PRII	<p><i>"Decompaction: All compacted road surfaces that would be covered with excavated material, for example the inside half of the road surface, shall be decompacted to a depth of 36 inches or to a restrictive layer (bedrock)."</i> The RCP includes deep ripping of recontour surfaces, not the roadbed. There is no Forest Plan Amendment or regulatory requirement listed for this row (original source unclear), so these minor changes should not affect the SDEIS analysis. Please edit.</p>

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Chapter 2 - Alternatives Including the Proposed Action	53	2-98	2.4.9	Table 2.4-12; 1st column, 2nd row	PRII	" Soil-Vegetation Plug Transplanting : Excavate soil-vegetation plugs from adjacent natural and undisturbed ground having a minimum surface area of 9 sq. ft. to a depth beyond the vegetation rooting zone (plug size is dictated by excavator bucket size). " The RCP includes planting of seedlings from commercial and an on- or near-site nurseries, only . There is no Forest Plan Amendment or regulatory requirement listed for this row (original source unclear), so these minor changes should not affect the SDEIS analysis. Please edit.
Chapter 2 - Alternatives Including the Proposed Action	54	2-98	2.4.9	Table 2.4-12; 1st column, 2nd row	PRII	"Soil-vegetation plug transplanting would be done at a minimum rate of 15 plantings per 100 lineal feet evenly distributed along the width and length of the recontoured surface. " Depending on the width of the recontoured surface, the plant prescription included in the RCP (which are not specific to the MMP) may or may not satisfy this criteria. There is no Forest Plan Amendment or regulatory requirement listed for this row (original source unclear), so these minor changes should not affect the SDEIS analysis. Please remove this bullet.
Chapter 2 - Alternatives Including the Proposed Action	55	2-99	2.4.9	Table 2.4-12; 1st column, 1st row	PRII	"When applying coarse woody debris, use various size classes at levels similar to surrounding undisturbed ground and placed at various orientations. " No such criteria are considered in the RCP as it relates to the commitment to place CWD. There is no Forest Plan Amendment or regulatory requirement listed for this row (original source unclear), so these minor changes should not affect the SDEIS analysis. Please remove this bullet.

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Chapter 2 - Alternatives Including the Proposed Action	56	2-113	2.4.9	Table 2.4-13; 1st column; 5th row	PRII	"Perpetua would manufacture growth media material using screened fines from glacial till sources mined from the Yellow Pine pit, available mulched vegetation, and off-site composted material." The RCP does not include screening of YPP till as a method to create GM. Please delete " screened ".
Chapter 2 - Alternatives Including the Proposed Action	57	2-114	2.4.9	Table 2.4-13; 1st column; 3rd row	PRII	"Merchantable timber on NFS surface lands could be purchased from the USFS. Non-merchantable trees, deadwood, shrubs, and slash would be removed, and any remaining vegetation would be grubbed using a bulldozer. The resulting material would be saved for future use in reclamation activities. Specifically, the organic matter would be chipped and stockpiled for use as mulch or blended to create a growth media additive. After vegetation removal, growth media would be salvaged and stockpiled. Stockpiles would be stabilized, seeded, and mulched to protect the stockpiles from wind and water erosion." Suggest replacing these sentences with: "Trees and deadwood, shrubs, and slash not needed to construct windrows at the edge of BLR disturbance (to function as sediment barriers), would be chipped, and suitable soil will be separately salvaged and stockpiled (except for a small portion that will be 'live handled') for use as part of site reclamation and restoration. Portions of the salvaged soil will be blended with the chipped wood to create growth media. All growth media placed in stockpiles would be stabilized, seeded, and mulched to protect the stockpiles from wind and water erosion."

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	58	2-127	2.6	entire section	PRII	Recommend revising and clarifying this section by: 1) including a tie to why this alternative arose (public suggestion or which significant issue) and 2) consistently applying the rationale stated as to whether the alternative is not reasonable or does not meet the purpose and need (and why it doesn't meet the purpose and need).
Chapter 2 - Alternatives Including the Proposed Action	59	2-136	2.8	Table 2.8-1	PRII	Issues and indicators identified are not consistently used throughout the summary tables, the affected environment or the environmental consequences. While all the resource issues and their indicators should be made consistent with the other sections, it is particularly problematic in Tribal Rights and Interests, Wetlands and Riparian Resources, Access and Transportation. Please review how issues and indicators are used in the whole SDEIS, and make the list here consistent with lists in Chapter 4 sections and with various areas of Chapter 1.
Chapter 2 - Alternatives Including the Proposed Action	60	2-137	2.8	Table 2.8-1; 5th column; 4th row	PRII	<i>"Changing climatic conditions would be expected to result in decreased soil moisture and quality; air quality; annual streamflow; groundwater recharge; water quality; increased surface water temperatures; increased spread of insects and diseases; changes in the timing, duration, and severity of fire seasons; and habitat loss and fragmentation."</i> This would be the same in the No Action Alternative. So it's either "Same as Baseline Conditions" or the No Action needs to also say this.

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

A1: Other Resources

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Chapter 2 - Alternatives Including the Proposed Action	61	2-137	2.8	Table 2.8-1; 6th column; 4th row	PRII	"Same as 2021 MMP, except the severity of climate change impacts may be reduced for surface water (quality and quantity), wetlands and riparian resources, vegetation (including general vegetation communities, botanical resources, and non-native plants), fish resources and fish habitat, wildlife and wildlife habitat, and special designations." The "small incremental differences" noted above in this chapter will not result in these impacts. The effects on all the alternatives considered in detail should be exactly the same for this row.
Chapter 2 - Alternatives Including the Proposed Action	62	2-138	2.8	Table 2.8-1; 5th column; 2nd row	PRII	"A total of 1,658,000 BCY of GM and seed bank material (SBM) would be required to meet the specified reclamation areas and GM/SBM thicknesses." Please replace " 1,658,000 BCY " with " 1,657,000 BCY " for accuracy.
Chapter 2 - Alternatives Including the Proposed Action	63	2-138	2.8	Table 2.8-1; 5th column; 2nd row	PRII	"The 797,702 BCY deficit of RCM would be generated from unsuitable unconsolidated till mined from the Yellow Pine Pit plus other cover material at the project site and amended for suitability." Please replace " 797,702 BCY " with " 796,873 " for accuracy.
Chapter 2 - Alternatives Including the Proposed Action	64	2-142	2.8	Table 2.8-1; all columns; 5th row	PRII	These discrete ranges out to several decimal places imply much more certainty and uniformity to water quality conditions than does, or will, exist. Please cite the source of these values to allow the reader to look more closely at the expected conditions.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	65	2-142	2.8	Table 2.8-1; 5th column; 5th row	PRII	These general groupings by waterbody are not telling the full story for temperature. For example, in the EFSFSR, stream temperatures are near or below baseline by EOY12. At the TSF on Meadow Creek, temperatures are elevated compared to baseline, but in Meadow Creek downstream from East Fork Meadow Creek, temperatures substantially decrease relative to the baseline conditions during mine operations and closure/reclamation activities. Please refine these groupings to reflect these details.
Chapter 2 - Alternatives Including the Proposed Action	66	2-142	2.8	Table 2.8-1; 3rd and 5th column; 5th row	PRII	Baseline East Fork SFSR Summer Max Temperature is (13.7 to 17.4); 2021 MMP Summer Max Temperature is (13.8 to 18.3); all mercury units are ng/L. Please revise.
Chapter 2 - Alternatives Including the Proposed Action	67	2-144	2.8	Table 2.8-1; 5th column; 6th row	PRII	"The 2021 MMP would impact 3,991.0 acres of modeled potential habitat for sensitive and forest watch plant species." Please check and clarify how these numbers of acres are larger or nearly so than the total acres of vegetation cleared in the rows below. You cannot provide a total number of acres of modeled potential habitat since it would double count areas that are considered potential habitat for multiple species.
Chapter 2 - Alternatives Including the Proposed Action	68	2-144	2.8	Table 2.8-1; 5th column; 7th row	PRII	"The 2021 MMP-related vegetation clearing would impact 3,563.7 acres, including primarily undisturbed areas for the Burntlog Route where an increase in the potential for non- native plant establishment and spread would be more deleterious." These numbers are larger than the total acres of disturbance in Chapter 2 (Tables 2.4-1 and 2.5-2). Check these numbers and update accordingly or clarify how and why these numbers are bigger.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	69	2-145	2.8	Table 2.8-1; 5th column; 1st row	PRII	" 119.8 acres of wetlands would be lost at the mine site (28% of wetlands at the mine site). " PRII is proposing a total of 145.5 acres of wetland impacts for the mine site focus area and the off-site focus area per the wetland ledger and November 2021 CMP.
Chapter 2 - Alternatives Including the Proposed Action	70	2-145	2.8	Table 2.8-1; 5th and 6th columns; 3rd row	PRII	" 2021 MMP : 1,054.4 functional units would be lost, including 375.9 high- value functional units. " " Johnson Creek Route Alternative : 1,028.3 functional units would be lost, including 370.6 high-value functional units. " PRII is proposing 704.5 units of functional impacts for the mine site focus area and the off-site focus area per the wetland ledger and November 2021 CMP. This number includes functional units for temporary impacts and is misleading. Same for the Johnson Creek Route Alternative. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	71	2-145	2.8	Table 2.8-1; 5th column; 5th row	PRII	" 196.1 wetland acres lost . " PRII contends this is 145.5 acres. Also, recommend rewording "lost" to "impacted and fully mitigated". This number apparently includes temporary impacts. See comments related to this in Section 4.11 and on the Wetland Specialist Report. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	72	2-152	2.8	Table 2.8-1; 5th column; 4th row	PRII	" NIDGS Direct Impacts: 63 acres " See comments in the wildlife specialist report. This is modeled habitat only, with no NIDGS observed within the analysis area based on surveys. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	73	2-153	2.8	Table 2.8-1; 5th column; 4th row	PRII	" Access Roads – 15 miles new road on Burntlog Route Cabin Creek OSV route – 10.4 miles groomed OSV route Utilities – new utility access roads – 25 miles " This should include the JC Rd OSV route. Although it is temporary in nature. Also, the public access route around YP pit. Please review and revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	74	2-153	2.8	Table 2.8-1; 6th column; 4th row	PRII	"Access Roads – No new access road miles. No Cabin Creek OSV route. " This should be the same as the 2021 MMP except the Access Roads - Burntlog Route. Utilities and CC OSV route would remain under JCR Alt. Additionally, the JC OSV route would be needed construction through closure and should be included. Also, the public access route around the YP pit. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	75	2-153	2.8	Table 2.8-1; 3rd and 5th column; 4th row	PRII	Utility access roads are the same in the baseline as the 2021 MMP - 25 miles for both. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	76	2-153	2.8	Table 2.8-1; 6th column; 7th row	PRII	"AADT – Construction through Post Closure: <ul style="list-style-type: none"> • Warm Lake Road – 1,826 – 1,868 • Johnson Creek Road – 70 - 120 • Stibnite Road – 30 - 80 " C & Stibnite road traffic should be the same in the JCR alt as 2021 MMP since the construction traffic numbers are the same. JC Road - 70 to 135 and Stibnite Road - 30 to 95 since the baseline is 70 and 30 respectively, and the construction AADT is 65. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	77	2-154	2.8	Table 2.8-1; 5th column; 1st row	PRII	"Access Roads – new roads – 28 miles Utilities – new utility access roads – 25 miles " Where does 28 miles come from? States 15 miles for BL Route above. Please review and revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	78	2-154	2.8	Table 2.8-1; 3rd column; 2nd row	PRII	Currently plowed: "Warm Lake Road – 26 miles Stibnite Road – 14 miles " Valley Co currently plows from Yellow Pine to Wapiti Ranch ~9 mi. Please refer to plowing of JC Road in Access and Transportation specialist report; Section 5.1.1, third bullet (page 25). Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	79	2-154	2.8	Table 2.8-1; 5th; 2nd row	PRII	Proposed (new) to be plowed: "Burnt Log Road – 21 miles (currently groomed). Burnt Log Road Extension – 15 miles (proposed new). " Only 2.3 miles of Burnt Log Road is permitted to be groomed. Also, new plowing of JC Rd during construction ~ 16 miles. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	80	2-154	2.8	Table 2.8-1; 5th and 6th column; 2nd row	PRII	Proposed (new) to be plowed: " 2021 MMP: Burnt Log Road – 21 miles (currently groomed). Burnt Log Road Extension – 15 miles (proposed new). " " Johnson Creek Route Alternative: Johnson Creek Road – 17 miles (conversion of existing OSV portion of Johnson Creek Road). " Should include 8 miles of Warm Lake Rd between Warm Lake and Landmark. Please review and revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	81	2-154	2.8	Table 2.8-1; 5th column; 9th row	PRII	<p>"Burnt Log Road (plowed). Mine site public access during operations (not plowed). Loss of winter groomed OSV trail on Warm Lake Road to Landmark. Loss of winter groomed OSV trail on Johnson Creek Road from Wapiti Meadows to Trout Creek campground during construction of Burntlog Route. "</p> <p>"Burnt Log Road" should read "Burntlog Route".</p> <p>These two statements about OSV losses (for both MMP and JCR alt) fail to describe how these losses will be mitigated, i.e. new OSV routes along CC and the west side of JC Rd to maintain access to Landmark. Should also include that as part of the MMP that following construction JC Rd will be groomed again between Landmark and Wapiti. Please review and revise.</p>
Chapter 2 - Alternatives Including the Proposed Action	82	2-155	2.8	Table 2.8-1; 5th and 6th column; 1st row	PRII	<p>"2021 MMP: Forest Service = no change; Valley County = 2.2 miles; State = no change; Private = 13.5 miles (with an additional 4 miles through the SGP) "</p> <p>"Johnson Creek Alternative Route: Forest Service = no change; Valley County = 2.2 miles; State = no change; Private = 4 miles through the SGP "</p> <p>Please provide the source for this information as it differs from what is presented in Chapter 4.</p>
Chapter 2 - Alternatives Including the Proposed Action	83	2-155	2.8	Table 2.8-1; 5th and 6th column; 3rd row	PRII	<p>"Water – potentially 1 roundtrip (2 truck trips) daily of antimony. "</p> <p>Please correct to "antimony" to "water".</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	84	2-155	2.8	Table 2.8-1; Row 4	PRII	" Issue : The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities. Indicator : Approximate miles of roads used by mine vehicles. " This summary does not accurately reflect the analysis for this indicator and provides new information that is not stated in Chapter 4. Please review and revise.
Chapter 2 - Alternatives Including the Proposed Action	85	2-155	2.8	Table 2.8-1; Column 3; Row 4	PRII	"South Fork Salmon River Road = 83 miles " According to table 3.16-1. SFSR Rd is appr. 31 miles. Also, Perpetua isn't proposing to use the SFSR Rd. Please delete.
Chapter 2 - Alternatives Including the Proposed Action	86	2-155	2.8	Table 2.8-1; Row 8	PRII	" Issue : Change in OSV access. " Column 3 : Replace " Groomed OSV trail along Johnson Creek Road from Trout Creek campground north to Wapiti Meadows " with "Groomed OSV trail from Landmark to Wapiti Meadows." Columns 5 & 6 : Both do not contain mention of the Paradise Valley connector, North Shore lodge connector, and JC to FS Rd 579 connector. All 3 apply to both alternatives Column 5: " OSV from Trout Creek Campground to Wapiti Meadows closed through construction of Burntlog Route. " Please add "Groomed OSV route will be re-established on JC Rd between Landmark and Wapiti following construction."
Chapter 2 - Alternatives Including the Proposed Action	87	2-159	2.8	Table 2.8-1; Column 5, Row 3	PRII	" These components include the mine and facilities at the SGP, Burntlog Route, upgraded transmission lines, new transmission line to the SGP, Johnson Creek substation, cell tower on Meadow Creek Lookout Road, use of Warm Lake Road, and temporary use of the Johnson Creek Route. " Perpetua has not proposed a cell tower on MC LO Rd. Rather a small repeater at the MC LO (building). Please review and revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 2 - Alternatives Including the Proposed Action	88	2-160	2.8	Table 2.8-1; Column 5; Row 1	PRII	"Construction, operations, and reclamation activities would affect access to operating areas of three of the outfitters and guides, affect their ability to provide licensed activities, and may degrade customer's recreation experiences ." Please provide more information about how and where this would happen.
Chapter 2 - Alternatives Including the Proposed Action	89	2-160	2.8	Table 2.8-1; Column 3; Row 3	PRII	"Landscape is characterized by valley floors surrounded by mountains with steep terrain broken up by narrow gorges and streams. Vegetation includes grass and evergreens. Existing modifications include the existing historical mining disturbances at the SGP, forest roads, transmission lines, and residences in the western portion of the analysis area. " Please add mention of the effect that previous fires have had on the landscape to give the reader an accurate depiction of the site.
Chapter 2 - Alternatives Including the Proposed Action	90	2-168	2.8	Table 2.8-1; Column 1, Row 2	PRII	" Issue : The SGP would impact tribal resources, restrict tribal access, and reduce viability and/or availability of culturally significant fish, wildlife, and plants. " Please update issue to reflect Chapter 4 " The SGP would affect tribal rights and interests through physical, audible, and visual disturbances to tribal resources, through restricting access of tribal members from usual and accustomed fishing places; hunting, pasturing and plant gathering areas; and through changes to the viability and availability of culturally significant fish, wildlife, and plant species. " Also, indicators are similar but not the same.
Geologic Resources and Geotechnical Hazards	91	4-7	4.2.2.2	4, 5, 6	PRII	Mineral Resource tonnage reported in the FS is in metric tonnes, not imperial tons. Please correct.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Geologic Resources and Geotechnical Hazards	92	4-7	4.2.2.2	7	PRII	"The SGP would change the domestic mine production of antimony in the U.S. from the current zero production to 52,319 metric tons of contained antimony over the life of the mine..." should say "recovered" antimony..."contained" is a higher value. Please replace contained with recovered.
Geologic Resources and Geotechnical Hazards	93	4-8	4.2.2.2	2	PRII	As an update for the FEIS, this section may also discuss the grant awarded by the DOD to study production of antimony tri-sulfide for munitions, as announced in December 2022.
Geologic Resources and Geotechnical Hazards	94	4-8	4.2.2.2	8	PRII	"High-antimony ore makes up about 30 percent of the ore in the Yellow Pine deposit and 54 percent of the ore in the Hangar Flats deposit...". Please correct: High antimony is approximately 21% of the YP mineral reserve and 36% of the HF reserve, as shown in table 1-4 of the Feasibility Study, (M3 2021). The stated numbers are not consistent with the resource either.
Geologic Resources and Geotechnical Hazards	95	4-11	4.2.2.2	8	PRII	"The SGLF has a post-mining land use designation of light industry, where it would remain un-reclaimed after mine operations and transferred to a third-party for light industrial uses". Please clarify: According to the Valley Co conditions of approval, this facility would need to be reclaimed if a third party doesn't obtain a new Condition Use Permit for the facility within 3 years.
Geologic Resources and Geotechnical Hazards	96	4-17	4.2.2.2	4	PRII	Please add "and up to" before "5-foot-thick", replace "peat" with "organic soil", and strike "silt and clay" to avoid overstating the extent and nature of the organics layer, and implicitly acknowledge that loose sand is also a potential weak material by avoiding over specifying "silt and clay"

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Geologic Resources and Geotechnical Hazards	97	4-18	4.2.2.2	1	PRII	<p><i>"The presence of the buttress would enhance the overall tailings embankment stability by providing significant additional resisting mass (70 million tons) to resist tailings embankment deformation in static or earthquake conditions "</i>. Please correct; should be 81 million short tons.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Geologic Resources and Geotechnical Hazards	98	4-18	4.2.2.2	2	PRII	<p>To aid understanding by defining FOS before it is used, and to correctly define design criteria and the analysis cases (standalone dam, or dam with buttress/loss of containment) which were incorrect in the SDEIS, please strike the paragraph beginning with "<i>Slope stability analyses were performed...</i>" and insert the following two paragraphs instead, below the paragraph beginning with "<i>The term "factor of safety" is used...</i>":</p> <p>Based on IDAPA criteria, FEMA guidance, and industry best practice, Perpetua Resources adopted the Maximum Credible Earthquake (MCE, roughly the 10,000-year event) as the design seismic event for the TSF embankment on a standalone basis. That is, the standalone dam would have a minimum factor of safety of 1.0 for the MCE without taking any credit for the presence of the buttress, even though some amount of buttress would always be present.</p> <p>Slope stability analyses were performed for static, or normal loading conditions, and for pseudo static conditions, representing earthquake loading conditions. The TSF embankment and TSF Buttress were analyzed to determine factors of safety for two potential failure surfaces: 1) full height failure of the downstream slope of the TSF Buttress such that the failure surface intersects the TSF dam crest and thereby causes a potential loss of tailings or water containment; and 2) TSF dam failure, similarly intersecting the crest, but assuming the buttress was not present. Analyses were developed for a variety of events up to and including the design event (the MCE). Results for static conditions, the 2,475-year event, and the MCE are reported in</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Geologic Resources and Geotechnical Hazards	99	4-18	4.2.2.2	Table 4.2-1	PRII	<p>The numbers in the table are confusing and do not match the cases in the RFAI-116 response, from 4/20/2021, which presented the ModPRO2/MMP results, and do not properly reflect the facility design criteria (MCE for standalone dam). Tierra Group 2021 (in response to RFAI-116) would be the proper citation for FOS values to tabulate; Tierra Group 2017 discusses methodology but the results therein are for the PRO configuration. The dam with the buttress has a static FOS ranging from 4 to nearly 6. The standalone dam is around 2 but always more than 1.5. Buttress face (a closure/reclamation stability question not a dam safety question) is above 1.5, but was not included here. Please replace Table 4.2-1 with the corrected table provided in the comment letter, including striking table footnote 1.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Geologic Resources and Geotechnical Hazards	100	4-18	4.2.2.2	4	PRII	<p>Please correct this paragraph to reflect updated values and updated references for comment above, and consider deleting most of it (everything after "NEPA analysis.") in favor of tabulated values, as the remainder of the paragraph is largely redundant with content above. A potential replacement paragraph is below (without preferred deletion):</p> <p>Based on the slope stability analysis of the proposed design of the TSF dam (Tierra Group 2017, 2021), failure of the TSF embankment from a seismic event is considered to have extremely low probability – less than, and likely far less than, 1 in 10 million annually . Therefore, analysis of failure-related environmental effects is not included in this NEPA analysis. The pseudo-static (i.e., earthquake load) factor of safety for the TSF embankment with the downstream design and buttressing has been calculated for the design earthquake event and selected smaller events covering a range of potential earthquakes possible at the site. At TSF complete build-out, the pseudo static Factor of Safety for the 2,475-year event would be 3.61, more than three times the minimum earthquake load Factor of Safety 1.00, per IDAPA Section 37.03.0. For the MCE (design event) at full build-out and post-closure, the Factor of Safety would be 2.05. The MCE event has a much longer return period (approximately 10,000 years), meaning there is a lower probability of occurrence than the 2,475-year return period earthquake, and results in higher peak ground acceleration (see Section 3.2, for information on peak ground acceleration).</p> <p>Additionally, at complete build-out of the TSF, the static load Factor of Safety would be 5.85, which is well above the minimum required static</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Geologic Resources and Geotechnical Hazards	101	4-19	4.2.2.2	2	PRII	"Effects would range from temporary (e.g., minor damage that is easily reparable) to permanent (e.g., lateral displacement at fault crossings)". Please remove example; there are no active faults crossing mine facilities as this implies.
Geologic Resources and Geotechnical Hazards	102	4-19	4.2.2.2	2	PRII	The language "Impacts would be reduced to moderate intensity effects through incorporation of existing geotechnical design standards..." coupled with the previous sentences' characterization of impacts as "high-intensity" or "permanent" implies incorrectly that this impact reduction is in some doubt. We are designing to current codes or above. If the effects are reduced to "moderate" then the previous sentences should discuss "Potential effects" not just "Effects" when referring to intensity or duration of effects without application of design standards or other mitigation measures.
Air Quality	103	3-40	3.3.4.3	3	PRII	"NAAQS for O3, (i.e., annual fourth-highest daily maximum 8-hour average) was 67 ppb ..." Please change "67" to "69" to match with Table 3.3-3.
Air Quality	104	3-45	3.3.4.4	Table 3.3.5, footnote	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality	105	3-57	3.3.4.4	Table 3.3-11, last row	PRII	The first (12.91) and the third (1.88) overall mean values are switched.
Air Quality	106	4-28	4.3.2.1	2	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality	107	4-28	4.3.2.2	4	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality	108	4-29	4.3.2.2	3	PRII	"to determine total estimated SGP ozone impacts for..." Please replace "ozone" with "respective." This sentence is referring to both secondary PM2.5 and O3.
Air Quality	109	4-29	4.3.2.2	3	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Air Quality	110	4-30	4.3.2.4	5	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality	111	4-31	4.3.3.1	7	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality	112	4-31	4.3.3.1	8	PRII	"In AERMOD, the mine pit sources were modeled as rectangular volume sources (OPENPIT routine), with individual lateral dimensions and release heights for each pit used to calculate initial vertical dispersion parameters. In CALPUFF, the pit sources were modeled as square area sources located with a release height at the top of the pit opening, with the pit located from the AERMOD lateral dimensions." Please delete this statement. It was initially proposed in the Protocol. The pits were modeled as "AREA" sources therefore this change was not needed. Please see the (Air Sciences 2018a).
Air Quality	113	4-34	4.3.4.2	4	PRII	"During operations, public access..." Please add "restricted" before "public access..."
Air Quality	114	4-35	4.3.4.2	3	PRII	"For the 2021 MMP, emission control devices and designs would be put in place to abate emissions of particulate matter, Hg, and criteria pollutant emissions from internal combustion engines - " Please delete. Controls are used for various ore processing and refining sources.
Air Quality	115	4-35	4.3.4.2	4	PRII	"(e.g., stationary internal combustion new source performance standards, 40 CFR 60, Subparts IIII and JJJ)." This discussion is related to mobile off-highway vehicles, therefore, 40 CFR 89, 90, and 1039 would be the appropriate examples here.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Air Quality	116	4-36	4.3.4.2	1	PRII	"(e.g., 40 CFR 60, Subparts IIII and JJJ)." This discussion is related to mobile off-highway vehicles, therefore, 40 CFR 89, 90, and 1039 would be the appropriate examples in b 6.
Air Quality	117	4-40	4.3.4.2	Table 4.3-5	PRII	The HCN (tpy) process (r 2, c 2)and fugitive (r 3, c 2) emissions are switched.
Air Quality	118	4-46	4.3.4.2	5	PRII	" <i>The results illustrate that the overall impact from the associated HAPs would be moderate, but well below the IDEQ permitting thresholds.</i> " This should be described as "minor" because the AACC are screening level thresholds. Modeling is conducted at the project boundary, not for sensitive receptors - and no risk analysis is required for impacts less than the AACC. Also, IDEQ allows impacts to be 10 times higher if you install T-RACT controls. SGP is installing T-RACT controls and demonstrates compliance with AACC without taking the 10x credit, i.e., impacts are minor.
Air Quality	119	4-47	4.3.4.2	Table 4.3-14	PRII	The ug/m3 values in r 3, c 3, 4, 5 are incorrect. Correct values are 3.0, 118, and 120 at 25C and 1 atm.
Air Quality	120	4-50	4.3.4.2	Table 4.3-18	PRII	Please correct to "east" to "west" in r 2, c 1.
Air Quality	121	4-51	4.3.4.2	Table 4.3-19 footnote	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality	122	4-52	4.3.4.2	2	PRII	Please correct reference "Air Resources 2018b" to "Air Sciences 2018a."
Air Quality	123	4-54	4.3.4.2	3	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Air Quality	124	4-54	4.3.4.2	4	PRII	"Using the same stringent Class I criteria for the Class II wilderness areas included in this analysis demonstrates that the level of regional haze impact in these areas is predicted to be <i>minor</i> ." This should be described a "negligible." Per the FLAG (2010) document: "After CALPUFF is run, CALPOST is used to evaluate whether the proposed source or modification will be below the Agencies' threshold for concern (i.e., 5% change in light extinction)." Therefore, impacts below the "threshold of concerned" should be considered "negligible."
Air Quality Specialist Report	125	8	2.3	Table 2-1	PRII	Please change "Access route..." to "Restricted access route..." in r 2, c 3, b 5
Air Quality Specialist Report	126	10	2.3	Table 2-1, r 2, c 3, b 5	PRII	Please change "Public access..." to "Restricted public access..." in r 3, Operations b 4.
Air Quality Specialist Report	127	30	5.4.1	4	PRII	"The 2021 MMP was characterized in AERMOD..." Please add "the Burntlog Route" before "was characterized..."
Air Quality Specialist Report	128	30	5.4.1	4	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	129	30	5.4.1	5	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	130	31	5.4.2	1	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	131	31	5.4.2.1	3	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	132	32	5.4.2.1	2	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	133	33	5.4.4	3	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	134	34	5.5	Table 5-3 footnote	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Air Quality Specialist Report	135	35	5.5.1	4	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	136	35	5.5.1	5	PRII	"In AERMOD, the mine pit sources were modeled as rectangular volume sources (OPENPIT routine), with individual lateral dimensions and release heights for each pit used to calculate initial vertical dispersion parameters. In CALPUFF, the pit sources were modeled as square area sources located with a release height at the top of the pit opening, with the pit located from the AERMOD lateral dimensions." Please delete this statement. It was initially proposed in the Protocol. The pits were modeled as "AREA" sources therefore this change was not needed. Please see the (Air Sciences 2018a).
Air Quality Specialist Report	137	37	6.1.1	Table 6-1	PRII	Please correct the footnotes for PM10, PM2.5, and O3.
Air Quality Specialist Report	138	43	6.1.4.1	Table 6-4 footnote	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	139	55	6.1.4.2	Table 6-10, last row	PRII	The first (12.91) and the third (1.88) overall mean values are switched.
Air Quality Specialist Report	140	62	7.2.2.1	2	PRII	"During operations, public access..." Please add "restricted" before "public access..."
Air Quality Specialist Report	141	62	7.2.2.2	8	PRII	"For the 2021 MMP, emission control devices and designs would be put in place to abate emissions of particulate matter, Hg, and criteria pollutant emissions from internal combustion engines ." Please delete. Controls are used for various ore processing and refining sources.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Air Quality Specialist Report	142	63	7.2.2.2	2	PRII	"(e.g., stationary internal combustion new source performance standards, 40 CFR 60, Subparts IIII and JJJ)." This discussion is related to mobile off-highway vehicles, therefore, 40 CFR 89, 90, and 1039 would be the appropriate examples here.
Air Quality Specialist Report	143	63	7.2.2.2	3	PRII	"(e.g., 40 CFR 60, Subparts IIII and JJJ)." This discussion is related to mobile off-highway vehicles, therefore, 40 CFR 89, 90, and 1039 would be the appropriate examples in b 7.
Air Quality Specialist Report	144	67	7.2.2.2	2	PRII	"Please refer to Section 7.2.2.2 for further details ." Please correct reference to "Section 7.2.2.3."
Air Quality Specialist Report	145	68	7.2.2.2	Table 7-4	PRII	The HCN (tpy) process (r 2, c 2)and fugitive (r 3, c 2) emissions are switched.
Air Quality Specialist Report	146	75	7.2.2.2	5	PRII	"The results illustrate that the overall impact from the associated HAPs would be moderate , but well below the IDEQ permitting thresholds. " This should be described as "minor" because the AACC are screening level thresholds. Modeling is conducted at the project boundary, not for sensitive receptors - and no risk analysis is required for impacts less than the AACC. Also, IDEQ allows impacts to be 10 times higher if you install T-RACT controls. SGP is installing T-RACT controls and demonstrates compliance with AACC without taking the 10x credit, i.e., impacts are minor.
Air Quality Specialist Report	147	76	7.2.2.3	Table 7-13	PRII	The ug/m3 values in r 3, c 3, 4, 5 are incorrect. Correct values are 3.0, 118, and 120 at 25C and 1 atm.
Air Quality Specialist Report	148	79	7.2.2.3	Table 7-17	PRII	Please correct to "east" to "west" in r 2, c 1.
Air Quality Specialist Report	149	80	7.2.2.3	Table 7-18 footnote	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Air Quality Specialist Report	150	81	7.2.2.4	2	PRII	Please correct reference "Air Resources 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	151	82	7.2.2.4	2	PRII	"Table 7-20" reference is incorrect. Please change to "Table 7-21."
Air Quality Specialist Report	152	83	7.2.2.4	2	PRII	Please correct reference "Air Sciences 2018b" to "Air Sciences 2018a."
Air Quality Specialist Report	153	83	7.2.2.4	3	PRII	<i>"Using the same stringent Class I criteria for the Class II wilderness areas included in this analysis demonstrates that the level of regional haze impact in these areas is predicted to be minor."</i> This should be described a "negligible." Per the FLAG (2010) document: "After CALPUFF is run, CALPOST is used to evaluate whether the proposed source or modification will be below the Agencies' threshold for concern (i.e., 5% change in light extinction)." Therefore, impacts below the "threshold of concerned" should be considered "negligible."
Air Quality Specialist Report	154	88	7.3	1	PRII	Please change "suppressant" to "treatment" in b 3, 5.
Air Quality Specialist Report	155	88	7.3	1	PRII	Please change "IV" to "Tier 2 certified or better" in b 18.
Air Quality Specialist Report	156	96	7.7.7	Table 7-31	PRII	<i>"SGP air quality impacts would be less than NAAQS because emissions and under deposition significance levels."</i> Incomplete sentence in r 2, c 5.
Air Quality Specialist Report	157	98	8.0	Reference 2	PRII	<i>"Far Field Air Quality Impact Analysis."</i> Please change to: "Midas Gold Far-Field Air Quality Impact Analysis Protocol for the Stibnite Gold Project."
Climate Change	158	3-61	3.4	1	PRII	<i>"Climate change trends are discussed below by resource."</i> - Recommend this introductory statement be applied more consistently in the consideration of each resource in this section, and avoid venturing into impact analysis.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change	159	3-61	3.4.2	2	PRII	"Climate Change Area of Analysis " - Recommend that this include a temporal scope stated also, so that people understand the long-term nature of the speculation of the climate trend.
Climate Change	160	3-63	3.4.4.1	5	PRII	"During 2020, approximately 127,214 hectares (314,352 acres) were burned from forest fires (NICC 2021) ." - Please clarify if this value relates to Idaho exclusively, or the entire US.
Climate Change	161	3-67 and Section 3.4	3.4.4.6	6	PRII	Statements such as "Although climate change would not impact the likelihood of a spill, it could potentially impact the severity of a spill " speak to impact analysis rather than a description of affected environment and do not seem appropriate in Section 3. Recommend removing from this section.
Climate Change	162	3-71	3.4.4.20	3	PRII	"The tribes have specific rights to the affected land ..." - It would be more accurate to state that the tribes have rights "regarding" the affected land rather than "to" the affected land.
Climate Change	163	4-60	4.4.1	5	PRII	"The SGP activities could contribute to factors that influence climate change. " Please reconcile this statement with the following statement in Section 3.4, and how "contribution to factors that influence climate change" will be considered within the context of the Forest Service 2009a which states that: "It is not currently feasible to quantify the indirect effects of individual or multiple projects on global climate change; therefore, determining significant effects of those projects or project alternatives on global climate change cannot be made at any scale."
Climate Change	164	4-61	4.4.1.2	3	PRII	Recommend that this passage refer the reader to applicable SDEIS sections related to air quality analysis to provide a clearer picture of project emissions, which are only briefly described here and are not comprehensive.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change	165	4-61	4.4.1.3	4	PRII	Recommend that the purpose of providing the emissions factors listed in Table 4.4-1 be clarified in the context of the analysis that is being conducted. Please clarify the analysis, how these emission factors play into it, and how is this information is considered in the rest of this section.
Climate Change	166	4-62	4.4.2.1	1	PRII	"Under the No Action Alternative, the analysis area would continue to be impacted by current climate change trends. The No Action Alternative represents the baseline condition against which potential GHG emission and climate change effects are evaluated for the analysis area." - The text below does not address climate change characterizations for the No Action Alternative for resource areas that they characterize as being cumulative affected by climate change. Please include some characterization of continued impact by current climate change trends for the analysis area.
Climate Change	167	4-62	4.4.2.1	1 and global	PRII	"Mineral exploration would continue to occur as part of the Golden Meadows Exploration Project,..." Here and elsewhere, continued exploration is presented as a foregone conclusion for the No Action Alternative. It is not. Please replace 'would' with 'could'.
Climate Change	168	4-64	4.4.4.1	3	PRII	"While it is possible that processing may differ similar to mine operations, LOM 4 through LOM 18 are assumed to be identical to the maximum year ." - Recommend clarifying that this is a conservative assumption embedded in the emissions inventory and modeling. Thus it should be identified as such and should provide context for the over-estimation of actual emissions.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change	169	4-64	4.4.4.1	5	PRII	"Therefore, meaningful connection of the 2021 MMP GHG emissions to climate change effects at the state, regional, or global level cannot be provided." However, they could be presented as a percentage of these global/state/regional emissions, to provide context for the reader. This comparison to state emissions is done elsewhere in the SDEIS.
Climate Change	170	4-65	4.4.4.1	Table 4.4-2a and 4.4-2b	PRII	Recommend adding a footnote indicating that, to embed conservatism in the emissions inventory and air modeling, emissions estimates for several ore processing and refining emissions activities are assumed to be constant based on the equipment design capacity; their actual emissions would be lower in Yrs 17 and 18 in particular.
Climate Change	171	4-67	4.4.5.2	2	PRII	Recommend removing this entire paragraph as it includes speculative and inaccurate content. The nature of refinement that would be applied to the antimony concentrate, its inappropriately assigned similarity to gold refining, and assuming IPCO's CO2 emission rate for that refinement are all highly speculative and result in a GHG emissions value that is not reliable.
Climate Change	172	4-67	4.4.6.1	5	PRII	"Changes in landcover and slope stability due to climate change could create conditions that cause more frequent landslides, damaging vegetation and other forest resources. Landslides also could potentially impact surface water resources through increased sedimentation and runoff" - Recommend removing this passage as it is speculative, unsupported, and does not consider the potential variable of less winter precipitation.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change	173	4-68	4.4.6.3	2	PRII	"Much of this soil is currently poor quality (for example, old tailings piles), ..." - Please remove the reference to tailings as being considered as soil. In the context of the passage it suggests we plan to incorporate them into soil for reclamation activities which is inaccurate.
Climate Change	174	4-68	4.4.6.5	6	PRII	Regional climate change could affect the ability of Operations Area Boundary streams to maintain previous flow rates and recharge of water supply due to changes in Idaho snowpack and precipitation patterns (Halofsky et al. 2018). " - Use of this citation here is inappropriate as Halofsky et al 2018 did not address the SGP.
Climate Change	175	4-69	4.4.6.5	2	PRII	"Climate change induced changes in precipitation and evaporation could also impact the overall site-wide water balance which could result in significant changes to the amount of water being treated and discharged." - Please remove or edit this passage as appropriate; it disregards the climate sensitivity analysis that was applied to the Site Wide Water Balance.
Climate Change	176	4-72	4.4.6.16	2	PRII	"...more vegetation in the SGP area could be lost, creating greater visibility of the SGP and associated impacts to scenic resources." - Please remove or revise this statement as appropriate; it does not recognize the limited area from which the SGP is visible, regardless of a reduction in vegetation.
Climate Change	177	4-73	4.4.7	3	PRII	"The Johnson Creek Route Alternative would have the effect of decreasing overall construction phase GHG emissions; however, the construction activities to complete major improvements on the Johnson Creek Route would likely offset the decrease and would likely end up very similar to the 2021 MMP." - Recommend clarifying this sentence to avoid perceived contradiction.

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A1: Other Resources

Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change	178	4-73	4.4.8.1	6	PRII	"...the severity of impacts to wetlands and riparian resources would be less for the Johnson Creek Route Alternative compared to the Burntlog Route " - Recommend removing as this is not a comment on climate change.
Climate Change	179	4-73	4.4.8.2	7	PRII	"The Burntlog Route would not be constructed under the Johnson Creek Route Alternative, avoiding the construction of approximately 20 miles of new roadway. Although the impacts of climate change would be the same as 2021 MMP, it is expected that not constructing the Burntlog Route would help to reduce the severity of impacts to proposed-threatened plant species (whitebark pine), federally listed fish species, wildlife and wildlife habitat, and IRAs." - recommend removing as this is not a comment and climate change and should not be here.
Climate Change Specialist Report	180	3	2.1	5	PRII	"However, existing and approved activities (i.e., approved exploration activities and associated reclamation obligations) would continue ..." - Approved exploration activities 'could' continue, but are not guaranteed. Please change 'would' to 'could' throughout this document.
Climate Change Specialist Report	181	21	6.2.8	1	PRII	(Knowles and Gumtow 1996). - Recommend an alternative citation. The referenced document is not a scientific study, which makes this statement weakly supported, even though the bull trout is very cold-water adapted.
Climate Change Specialist Report	182	26	7.2.1	5	PRII	"Mineral exploration would continue to occur as part of the Golden Meadows Exploration Project. " - Approved exploration activities 'could' continue, but are not guaranteed. Please change 'would' to 'could' throughout this document.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change Specialist Report	183	32	7.2.2.1	3	PRII	"There is very little information on the energy usage, and GHG emissions, of smelting and refining antimony concentrate... ." - Recommend removing this entire paragraph as it includes speculative content. The nature of refinement that would be applied to the antimony concentrate, its assumed similarity to gold refining, and assuming IPCO's CO2 emission rate for that refinement are all highly speculative and result in a GHG emissions value that is not reliable.
Climate Change Specialist Report	184	33	7.2.2.2	2	PRII	"...however, increased particulate matter and other criteria pollutants as a result of climate change (e.g., potential for increased wildfires and decreased groundcover resulting in more particulates in the air) could persist within the SGP area (Jacob and Winner 2009) ." - Recommend a more applicable reference be included here: the cited document is not applicable to assessing particulate matter at the SGP as it predates the project.
Climate Change Specialist Report	185	33	7.2.2.2	3	PRII	"Much of this soil is currently poor quality (for example, old tailings piles), and would be unlikely to naturally revegetate at a normal rate " - Recommend clarifying this statement, which appears to suggest that legacy tailings will be incorporated into soils used for reclamation. This is not accurate.
Climate Change Specialist Report	186	34	7.2.2.2	5	PRII	"Climate change induced changes in precipitation and evaporation could also impact the overall site-wide water balance which could result in significant changes to the amount of water being treated and discharged." - This passage should discuss the climate sensitivity analysis on the Site Wide Water Balance that was conducted at the request of the USFS and Stantec.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change Specialist Report	187	37	7.2.2.2	2	PRII	<i>"Changing climatic conditions are expected to exacerbate the damage and loss of cultural resources and natural areas utilized by tribes for activities such as hunting, fishing, and gathering in the SGP area through increased soil erosion, more frequent and intense wildfires, flooding, degraded water quality, and wildlife and fish habitat impacts."</i> - It is unclear whether this statement speaks to background effects of climate change or project-specific effects. If the latter, this passage should better characterize both negative and positive impacts to the indicated resources.
Climate Change Specialist Report	188	39	7.2.2.2	3	PRII	<i>"The Johnson Creek Route Alternative would have the effect of decreasing overall construction phase GHG emissions;"</i> - Recommend clarifying that this alternative requires 2 additional years of construction, which would generate additional GHG emissions for additional layback work, (including temporary road installation and drilling), and installation of retaining walls, not to mention limited workdays resulting in additional employee travel to and from the work site.
Climate Change Specialist Report	189	40	7.3	2	PRII	<i>"This approach is done for ease of permitting"</i> . Recommend adding that this approach to developing emissions inventories embeds conservatism into the emissions inventory and resultant modeling and is not necessarily done for "ease of permitting".
Climate Change Specialist Report	190	42	7.5.2	Table 7-3 Row 4	PRII	<i>"Ongoing mining activities on patented land Mineral exploration and mining have occurred in several locations around the SGP area. Exploration activities are ongoing for potential future mining development."</i> - Please clarify what these activities are and where they are occurring consistent with the examples provided for the other project types included here.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Climate Change Specialist Report	191	44	7.8	4	PRII	"Direct and indirect GHG emissions and their associated impacts would be the same under the Johnson Creek Route Alternative as those discussed under the 2021 MMP." - Recommend clarifying that this alternative requires 2 additional years of construction, which would generate additional GHG emissions for additional layback work, (including temporary road installation and drilling), and installation of retaining walls, not to mention limited workdays resulting in additional employee travel to and from the work site.
Climate Change Specialist Report	192	44	7.8	5	PRII	"Exploration activities associated with the Golden Meadows Exploration Project would continue..." - Continued exploration is not guaranteed. Please replace "would" with "could".
Soils and Reclamation	193	3-73	3.5.3	3	PRII	"The Mined Land Reclamation Act of 1971 and implementing regulations require that land used for surface mining is reclaimed when mining is completed, meaning the mine operation must return the land to a "productive condition" (IDAPA regulations, Section 20.03.02)." This phrasing is not included in IDAPA 20.03.02 Please check the reference and revise.
Soils and Reclamation	194	3-76	3.5.4.2	3	PRII	"growth media and root zone material (Tetra Tech 2020a) and ": There is a more current citation in references cited. Please replace with "Root zone materials (Tetra Tech 2021a), which..."
Soils and Reclamation	195	3-78	3.5.4.2	Table 3.5-1	PRII	The header of column 5 is incorrect. Please correct to: "Recommended Average GM Salvage Depth". Then remove footnote 3, and revise footnotes 4 and 5 accordingly.
Soils and Reclamation	196	3-78	3.5.4.2	Table 3.5-1	PRII	the number "28" in row mCP, column "solum" should be 0. Please correct.
Soils and Reclamation	197	3-78	3.5.4.2	Table 3.5-1	PRII	The letter "B" in row AoD+, column "Soil" should be C. Please correct.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Soils and Reclamation	198	3-78	3.5.4.2	Table 3.5-1	PRII	Add to footnote 1A: 1C Areas of Previous Disturbance – With GM Salvage Potential”
Soils and Reclamation	199	3-85	3.5.4.7	Section name	PRII	Recommend that the title of Section 3.5.4.7 be changed to "Soil Metals" rather than "Soil Contamination", considering the text in the first sentence references " <i>natural background concentrations of some metals</i> ".
Soils and Reclamation	200	3-85	3.5.4.7	4	PRII	" <i>The mean concentration of arsenic (115 ppm) ...</i> ". Recommend adding the range of arsenic concentrations here to be more informative (i.e., " <i>... , with a range of 0.22 to 7380 ppm...</i> ").
Soils and Reclamation	201	4-76 and global	4.5.1	3	PRII	" <i>...creation of growth media through composting (Tetra Tech 2019a)</i> ". Throughout this section, this reference should be Tetra Tech 2021a. The 2019 RCP has been superseded by the 2021 version which is revised to the MMP.
Soils and Reclamation	202	4-76	4.5.1	3	PRII	" <i>...creation of growth media through composting (Tetra Tech 2019a)</i> ". Suggest replacing this passage with: " <i>...to offset the anticipated growth media deficit by using unconsolidated glacial till and colluvium/alluvium from the Yellow Pine Pit (Tetra Tech 2021a).</i> "
Soils and Reclamation	203	4-79	4.5.2.2	2	PRII	" <i>SGP-related TSRC within the PNF activity area under the 2021 MMP would total approximately 1,302 acres, with approximately 104 of these acres occurring over areas of existing TSRC</i> " The 104 ac value seems to be incorrect per the table (904 acres). Please correct.
Soils and Reclamation	204	4-79	4.5.2.2	3	PRII	" <i>The magnitude of impacts to soil resources within the PNF activity area includes excavation, grading, or filling of 1,457 acres (approximately 120 acres of which are already disturbed...</i> ". The 120 acre value seems inconsistent with table and value reported in Paragraph 2 of this page. Please verify and correct if needed.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Soils and Reclamation	205	4-83	4.5.2.2	5	PRII	"Final reclamation of the new transmission line corridor from the Johnson Creek Substation to the SGP would occur during the closure and reclamation phase beginning after Mine Year 15 " . The 2021 RCP states that electrical transmission line will be removed and reclaimed when no longer needed to power the water treatment facilities located at the Project site. This statement regarding mine year 15 is erroneous and should be corrected.
Soils and Reclamation	206	4-84	4.5.2.2	4	PRII	Full paragraph 4 - Reclamation Cover Materials. RCM is not restricted exclusively to GM (and SBM). Instead, RCM will also be composed of one or more of the following materials: development rock, YPP Till, or other materials that are non-PAG/ML and meet the Root Zone Material Suitability Guidelines; development rock, YPP Till, or other materials that are non-PAG/ML and meet the Root Zone Material Suitability Guidelines; natural regolith/random cut/fill; streambed material; and rock armoring layers. This and other sections of the SDEIS should be revised according to the definition of RCM presented in this comment and inferred in the RCP.
Soils and Reclamation	207	4-84	4.5.2.2	7	PRII	Please validate reported growth media volumes with values reported in Tetra Tech 2021a.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Soils and Reclamation	208	4-85	4.5.2.2	2	PRII	"Options being considered by Perpetua for developing additional GM for the SGP include: utilizing materials from off-site borrow areas and supplementing additional salvage of GM through composting". This statement is a remnant from an outdated RCP and the 2020 DEIS. The 2021 RCP states Yellow Pine Pit glacial till will be used to offset the deficit along with growth media amendment of chipped wood and compost. The 2021 RCP also discredits utilizing offsite soils borrow sources. SDEIS Section 2.4.7.12 and Table 2.4-12 (pg. 2-113) of this document notes the same YPP till source referenced in the 2021 RCP (Tetra Tech 2021a).
Soils and Reclamation	209	4-85	4.5.2.2	4	PRII	"This small amount of compost is not expected to provide sufficient long-term benefits to the GM that would be important for revegetation". Please remove. This statement is speculative and is not presented with any supporting scientific data.
Soils and Reclamation	210	4-86	4.5.2.2	1	PRII	"These stockpiles would be up to 200 feet tall, and the time between GM salvage and placement would vary greatly between different SGP facilities but could remain in stockpiles for as long as 1 to 42 years..." This is not accurately characterized; all but a few very small areas associated with long-term water treatment will be reclaimed by mine year 24. Additionally, the Fiddle Creek GM stockpile footprint is scheduled to be reclaimed and restored in mine year 23. See 2021 RCP (Tetra Tech 2021a).

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Soils and Reclamation	211	4-87	4.5.2.2	5	PRII	"Metal concentrations in growth media would be screened for comparison to baseline soil concentrations pre-reclamation per Forest Service requirements ." All native soils (not previously disturbed) salvaged for use as growth media have an inherent metals concentration which is those soil's baseline condition. Therefore, this SDEIS statement, implies that salvaged soils should be tested to determine if they abide by their own baseline conditions or to determine if they increase in metals concentration between salvage and reclamation (while in the GM stockpile). The intent of such screening should be targeted at non-native (previously disturbed) materials desired to be used as growth media and not the existing undisturbed soils salvaged for future reclamation use. Reword as follows. " Metal concentrations in non-native soils would be screened for comparison to native baseline soil concentrations". Also, add a reference for the statement of "...per Forest Service requirement" if this is to be used in the FEIS.
Soils and Reclamation	212	4-88	4.5.2.2	2	PRII	"Planned screening of soils for arsenic content would reduce this uncertainty." Planned screening and rejection of some soils with sustainable existing native vegetation based on a screening level criteria set from off-site locations would be detrimental to reclamation success. Please clarify the basis for any proposed soil screening protocol.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Soils and Reclamation	213	4-88	4.5.2.2	3	PRII	<p>Full paragraph 3. The conclusion here is based on one reference. The conclusions of other peer-reviewed research publications should be considered before discounting the capacity of phosphatic fertilizers to increase plant tolerance to soil arsenic, which is not necessarily synonymous with arsenic solubility in soils. An example of this is Abbas, et. al. (2018) which states: "Many studies have shown that the addition of phosphate to plants under As stress has positive effects on plant growth and as such could increase plant tolerance against As stress. It is well established that both As and Pi have similar chemical properties and use the same carrier molecules for the uptake in plant roots via plasma membranes. Many genetic studies and physiological data from different species have revealed that As(V) and Pi are taken up by the same transporters."</p> <p>Abbas, et. al. (2018) Arsenic Uptake, Toxicity, Detoxification, and Speciation in Plants: Physiological, Biochemical, and Molecular Aspects. <i>Int J Environ Res Public Health</i> . 2018 Jan; 15(1): 59.</p>
Soils and Reclamation Specialist Report	214	37	5.2	2	PRII	(Payette Forest Plan GL-37 and 38) - Please define these citations.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Soils and Reclamation Specialist Report	215	37	5.2	4	PRII	"All the SGP-related disturbance at the mine site would be subject to reclamation activities, with the exception of approximately 278 acres associated with the Hangar Flats high walls, the West End pit lake and high walls, Yellow Pine pit high walls, the Stibnite Lake feature, plus the Midnight, West End, and Plant Site ponds (Tetra Tech 2019, 2021b) ". This statement is inaccurate as presented as all contact water and plant site ponds will all be reclaimed. Similar to streams pit lakes such as West end and Stibnite lake should not be defined as TSRC given there is no pre-mining soils on these areas to be committed and they are on private lands
Noise	216	4-99	4.6.2.2	1	PRII	"Based on the Gazex explosive method, the maximum noise level would be 124.0 dBA at 100 feet away (Table 4.6-2), and at 50 feet away, the maximum noise level would be 130.0 dBA . A single blast at 50 feet away causes for a maximum noise level of 144.0 dBA . " These two values are conflicting dBA levels at 50 feet. Please only report whichever of these two values is correct.
Noise	217	4-99	4.6.2.2	1	PRII	"There are approximately 7.5 missions per year, limiting the amount of avalanche abatement measures to a narrow timeframe of the year, with long-term , minor, and localized impacts. " Shouldn't this be short-term? Please replace " long-term " with " short-term ".
Hazardous Materials	218	4-120	4.7.1	2	PRII	"In addition, the analysis considers modifications to existing and new access routes and proposed support facilities. " There is no mention of access route modifications in this section. If this addition is geared towards improving safe transport of material, please clarify by stating that here.
Hazardous Materials	219	4-123	4.7.2.2	Table 4.7-1	PRII	" Grinding media (balls for mill) Tons 8,100 337 600 0 (typically consumed, any residuals recycled offsite)" Not a hazardous material, please delete.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Hazardous Materials	220	4-123	4.7.2.2	Table 4.7-1	PRII	" Activated carbon Tons 500 23 50 0 (recycled and re-activated)" Not a hazardous material, please delete.
Hazardous Materials	221	4-124	4.7.2.2	Table 4.7-1	PRII	"Wastes containing mercury from ore processing (carbon canisters, filter packs, gas condensers) Pounds Not quantified Variable Variable Not quantified. Waste would be disposed off-site in permitted facilities." The anticipated mercury generated waste is stated in paragraph 3 of page <u>4-132</u> of this chapter as 10.9 tons per year with 10.7 tons consisting of metallic mercury in flasks. Please revise to state this.
Hazardous Materials	222	4-126	4.7.2.2	2	PRII	"These oils would be contained within the substation equipment and as per the site-specific SPCC plans " The substation equipment is the responsibility of IPCO and would be included in their SPCC plan, not the site-specific SPCC plan. Please replace " site-specific SPCC plan " with " IPCO SPCC plan "
Hazardous Materials	223	4-130	4.7.2.2	4	PRII	" All municipal waste and construction and demolition waste generated by the SGP would be collected in wildlife-resistant containers and hauled offsite for disposal in a municipal waste landfill. " Only municipal waste will be in wildlife resistant containers. Regular C&D waste is fine in standard dumpsters or roll off containers. Please edit to state " All municipal waste generated by the SGP would be collected in wildlife-resistant containers and all construction and demolition waster will be collected in standard dumpsters or roll of containers and hauled offsite for disposal in a municipal waste landfill."

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Hazardous Materials	224	4-131	4.7.2.2	2	PRII	"This would be determined at the SGP through operational experience during maintenance activities when the autoclave liner was rebuilt. " It is actually determined through a waste determination process outlined in RCRA rules (40 CFR 262.11) not operational experience. Please replace " through operational experience during maintenance activities when the autoclave liner was rebuilt " with " according to RCRA rules (40 CFR 262.11) "
Hazardous Materials	225	4-133	4.7.2.2	2	PRII	"Switchbacks and reduced turning radius also may be a challenge for large trucks operating on these roads. " Not a correct statement. The road is specifically designed to accommodate the vehicles & trucks that would be traveling to road. Please delete sentence.
Hazardous Materials	226	4-136	4.7.2.2	6	PRII	"Perpetua has prepared written spill response procedures described in their SGP Emergency Response Program (OHS-008) and SPCC Plan (OHSF-008K) that include:" The SPCC plan is ESOP-028 . OHS-008 is the number of the form for spill response in the ERP. Please replace " OHS-008 " with " ESOP-028. "
Hazardous Materials	227	4-139	4.7.2.2	3	PRII	"Though the Burntlog Route includes a greater number of stream crossings " According to the numbers in the same paragraph, the Johnson Creek route has more stream crossings. Please revise.
Hazardous Materials	228	4-139	4.7.2.2	5	PRII	"Mine transport begins on Warm Lake Road (CR 10-579) where the risk of spills would be lower, as it is paved and maintained by Valley County and has overall gentler grades with the exception of Big Creek Summit. " Incorrect. Please replace " Big Creek Summit " with " Warm Lake Summit "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	229	3-217	3.10.4.1	1	PRII	"Approximately 347 acres (2 percent) of the analysis area occur in the Salmon-Challis National Forest (administered by the PNF); however, PVG data were not available for this area." PVG data is available. Please incorporate PVG data from USFS in WBP modeled habitat .
Vegetation	230	3-221	3.10.4.1	Table 3.10-2	PRII	Please round the percentages to one decimal value as the summarized modeled habitat is not field verified and providing more decimal places of precision could be misleading.
Vegetation	231	3-227	3.10.4.2	Table 3.10-4, source	PRII	"Source: AECOM 2020e " The table footnote references the AECOM 2020e model, however earlier text indicates this model was updated by Stantec 2022. Please update the reference or clarify why the table references the previous report.
Vegetation	232	3-227	3.10.4.2	1	PRII	Please clarify how many total occurrences and subpopulations of Bent-flowered Milkvetch overlap the SGP analysis area and disturbance footprint
Vegetation	233	3-228	3.10.4.2	1	PRII	"Five subpopulations of a single occurrence (the Cinnabar Peak occurrence) of this species were documented during surveys in 2012, 2013 (HDR 2017g), and 2016 (Mancuso 2016, IFWIS 2017). " Please update data referenced from IFWIS 2017 to more recent data sources. These data are available from the USFS. The USFS is a partner with IFWIS and receives these data two times a year (January and July).
Vegetation	234	3-228	3.10.4.2	1	PRII	"The other subpopulations of this occurrence and the other occurrences of this species are located outside the analysis area for the SGP. " Please clarify how many "other" subpopulations.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	235	4-286	4.10.1	1	PRII	"Issue: The SGP would impact forested PVGs within Forest Service-administered land and could impact the ability of these areas to reach desired conditions." Table 1.10-1 lists all these issues as "may impact" instead of "would impact". Please use consistent language as "may" and "would" mean different things.
Vegetation	236	Global			PRII	For the FEIS, please change any reference to WBP as a "candidate" or "proposed threatened" species to "threatened" species to reflect the changes in status the WBP has gone through over the course of the Perpetua NEPA process.
Vegetation	237	4-286	4.10.1	8	PRII	"• N umber of acres of whitebark pine occupied habitat impacted by the SGP." Please clarify if this indicator and calculation is within the SGP disturbance area or the 300-foot buffered analysis area.
Vegetation	238	4-286	4.10.1	8	PRII	"• E stimated number of mature whitebark pine trees to be cut during SGP construction." Please provide methods, reference, and context for how these estimated WBP numbers were calculated. The methods were designed by the USFS and not discrete counts; providing numbers is misleading and needs explanation. Please also clarify mature WBP trees vs cone producing trees from the survey methodology. This should be qualified as an estimate of cone producing trees observed during 2019 field season, which is not the same as an estimate of the number of mature trees cut during construction. Please add context to this indicator such that the number of whitebark pine impacted can be evaluated as a percentage of a greater whole.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	239	4-287	4.10.1	1	PRII	"• P resence of known occurrences of sensitive or forest watch plant species or occupied habitat within 300 feet of the SGP disturbance area. " Please provide acres of occupied habitat within the SGP disturbance, similar to the other indicators.
Vegetation	240	4-287	4.10.2	6	PRII	"4.10.2 D irect and Indirect Effects " For this entire section, please provide support for the summary effects calls and clarify how the intensity, duration, and context were derived. It is unclear how the numbers of individual plants were calculated. Please clarify and provide a methods summary, reference, and context of how these numbers were calculated. Please include a percentage of the greater whole for context.
Vegetation	241	4-288	4.10.2.2	Table 4.10-1	PRII	Please clarify how these numbers were calculated and what datasets were used.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	242	4-291	4.10.2.2	2	PRII	<p>"Based on the results of the species-specific field surveys conducted for the SGP in 2019 (Tetra Tech 2020b), the 2021 MMP would impact approximately 259.4 acres of occupied whitebark pine habitat and would remove an estimated 1,236 individual trees, 23 of which would be mature, cone-bearing individuals. This would result primarily in localized, long-term and permanent, moderate impacts to the whitebark pine. Detailed calculations of impacts to whitebark pine occupied habitat and individual trees are reported in the SGP Vegetation Specialist Report Appendix F (Forest Service 2022g)."</p> <p>When reading this statement, it is unclear how these numbers were calculated. While this statement points to the SGP Vegetation Specialist Report Appendix F (Forest Service 2022g), that report does not provide clear methods for how these numbers were derived. Please clarify and provide a methods summary, reference, and context of how these estimated WBP numbers were calculated. These discrete reported numbers were derived from very broad estimates and categories from field surveys and not an actual count of individuals.</p>
Vegetation	243	4-291	4.10.2.2	4	PRII	<p>"Construction of the 2021 MMP would impact several known occurrences of sensitive and forest watch plant species as described in the following subsections." Please clarify under each species if there is any known occupied habitat/occurrences that are within the SGP footprint. Consider use of the number of acres of occupied habitat within the SGP disturbance as the indicator.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	244	4-292	4.10.2.2	2	PRII	"The most likely impact of the SGP on this subpopulation would be dust associated with construction of the West End Creek diversion, which could travel upslope and impact this subpopulation or its pollinators. " Please take into consideration dust control measures, the small project size of a diversion project, and the proximity of the diversion (300ft or more) to the noted sub-population.
Vegetation	245	4-292	4.10.2.2	2	PRII	"Impacts of dust on the Cinnabar Peak subpopulation could range from mild metabolic inhibition or inhibition of pollination to mortality of individuals; dust also could inhibit pollination success. " Please provide a reference for this statement.
Vegetation	246	4-292	4.10.2.2	4	PRII	"The combination of these potential impacts would result primarily in localized, long-term and permanent, moderate impacts to the bent-flowered milkvetch. " Please explain how these effects are permanent. Please explain how the effects are moderate instead of minor. The next statement says indirect impacts and only one individual, so please explain how can these be an easily measurable change and readily noticeable.
Vegetation	247	4-292	4.10.2.2	4	PRII	"(one out of a total of approximately 653 individuals within 10 populations identified on the PNF) " Please clarify and provide a methods summary, reference, and context of how these numbers were calculated. Also include a percentage of the greater whole for context.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	248	4-292	4.10.2.2	6	PRII	"The combination of these potential impacts would result primarily in localized, long-term and permanent , moderate impacts to the least moonwort. " Please correct this statement as it is in error under the MMP alternative because the JC Road would only be utilized for up to 3 years during the construction period. Therefore, by definition (table 4.1-1) these impacts would be classified as short-term.
Vegetation	249	4-292	4.10.2.2	6	PRII	"The combination of these potential impacts would result primarily in localized, long-term and permanent , moderate impacts to the least moonwort." This statement is used for every species, but it needs more supporting statements. Please explain this statement. Please explain how these effects are permanent. Please explain how the effects are moderate instead of minor. The next statement says indirect impacts and only two individuals, so please explain how can these be an easily measurable change and readily noticeable.
Vegetation	250	4-292	4.10.2.2	7	PRII	"(two out of a total of approximately 1,731 individuals in 14 populations on the PNF) " Please clarify and provide a methods summary, reference, and context of how these numbers were calculated. Also include a percentage of the greater whole for context.
Vegetation	251	4-293	4.10.2.2	2	PRII	"Increased dust deposition could result in impacts ranging from metabolic inhibition to mortality of individuals. " Please provide a reference
Vegetation	252	4-293	4.10.2.2	3	PRII	"Therefore, the 2021 MMP may indirectly impact Blandow's helodium individuals (one) " Please clarify and provide a methods summary, reference, and context of how these numbers were calculated. Also include a percentage of the greater whole for context.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	253	4-295	4.10.2.2	Table 4.10-4	PRII	"Table 4.10-4 <i>Acres of Direct Impacts to Modeled Special Status Plant Potential Habitat under the 2021 MMP</i> " For clarity, we suggest changing the title of this table to " Acres of Modeled Special Status Plant Potential Habitat within the 2021 MMP Disturbance Footprint ".
Vegetation	254	4-297	4.10.2.2	Table 4.10-5	PRII	"Table 4.10-5 <i>Total Acres of Disturbance to Vegetation Communities due to SGP Components under the 2021 MMP</i> " For clarity, we suggest changing the title of this table to " Total Acres of Vegetation Communities within the 2021 MMP Disturbance Footprint "
Vegetation	255	4-297	4.10.2.2	Table 4.10-5	PRII	Please clarify how these numbers were calculated and what datasets were used.
Vegetation	256	4-297	4.10.2.2	Table 4.10-5	PRII	Overall total acres in table is 3,563.7 . Please check the numbers in this table and clarify how and why this total acreage of disturbance is more than the total acreage of disturbance reported in Chapter 2 (Table 2.4-1; 3,265.9).
Vegetation	257	4-298	4.10.2.3	Table 4.10-6	PRII	"Table 4.10-6 <i>Acres of Disturbance to Previously Undisturbed Forested PVGs under the Johnson Creek Route Alternative</i> " For clarity, we suggest changing the title of this table to " Acres of Previously Undisturbed Forested PVGs within the Johnson Creek Route Alternative Disturbance Footprint "
Vegetation	258	4-299	4.10.2.3	Table 4.10-7	PRII	"Table 4.10-7 <i>Acres of Disturbance to Areas Identified as not Successional to Forested PVGs under the Johnson Creek Route Alternative</i> " For clarity, we suggest changing the title of this table to " Acres of Areas Identified as not Successional to Forested PVGs within the Johnson Creek Route Alternative Disturbance Footprint "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	259	4-300	4.10.2.3	Table 4.10-8	PRII	"Table 4.10-8 Acres of Disturbance to Vegetated Acres Outside Forest Service-Managed Lands under the Johnson Creek Route Alternative " For clarity, we suggest changing the title of this table to " Acres of Vegetation outside of BNF and PNF - Managed Lands within the Johnson Creek Route Alternative Disturbance Footprint. " SCNF lands are included in these calculations.
Vegetation	260	4-301	4.10.2.3	3	PRII	"The impacts to the Bent-flowered Milkvetch and Sacajawea's Bitterroot under the Johnson Creek Route Alternative are the same as described for the 2021 MMP. " Please add a clarifying summary statement about the one species discussed below: least moonwort.
Vegetation	261	4-301	4.10.2.3	4	PRII	"The Johnson Creek Route Alternative could impact subpopulations of the occurrence of least moonwort in the same manner as described under the 2021 MMP. " Please provide a short summary or description of what those impacts are.
Vegetation	262	4-301	4.10.2.3	4	PRII	"However, due to the localized nature of impacts within roadside swales under the Johnson Creek Route Alternative, impacts to this species may be greater than under the 2021 MMP. " Please clarify and support this statement.
Vegetation	263	4-304	4.10.2.3	Table 4.10-10	PRII	"Table 4.10-10 Total acres of Disturbance to Vegetation Communities due to SGP Components under the Johnson Creek Route Alternative " Please check the numbers in this table and clarify how and why this total acreage of disturbance (3,399.3) is more than the total acreage of disturbance reported in Chapter 2 (Table 2.5-2; 3,095.2).

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Vegetation	264	4-304	4.10.3	3	PRII	"At this time, no mitigation measures have been identified for Vegetation." This statement is inconsistent with Table 2.4-12 (and Table 2-2 of the Vegetation Specialist Report) which includes measures that are applicable to vegetation per the "Resources Affected" column. Please amend this sentence to reflect these measures.
Vegetation	265	4-305	4.10.4.2	1	PRII	"Alternative are renewable only over long-time spans, including mature vegetation, special status plants, seedbanks, and topsoil. Loss of these resources would be considered irreversible. " Please delete "Loss of these resources would be considered irreversible." Renewable over long-time spans is by definition not irreversible.
Vegetation	266	4-305	4.10.4.2	2	PRII	"This includes the loss of soil resources; even with reclamation (Tetra Tech 2021a), the temporal loss of the resource is irretrievable." Please double check this reference as it does not characterize loss of soil resources as irretrievable.
Vegetation	267	4-306	4.10.5.2	1	PRII	"Construction and operation of the mine could also affect long-term vegetation productivity by increasing sedimentation from erosion and increasing the amount of pollutants and fine-grained sediments delivered to the area via surface water runoff." Please delete this statement. This statement does not account for the restoration of Blowout Creek early in the project and does not take into consideration all of the sediment control environmental design features built into the MMP.

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Vegetation Specialist Report	268	62	7.2.3.4	3	PRII	"Detailed calculations of impacts to whitebark pine occupied habitat and individual trees are reported in Appendix F" Please clarify and provide a methods summary, reference, and context of how these estimated WBP numbers were calculated. These discrete reported numbers are derived from very broad estimates and categories from field surveys and not an actual count of individuals.
Vegetation Specialist Report	269	86	Table 7-15		PRII	"The 2021 MMP would impact 3,991.0 acres of modeled potential habitat for sensitive and forest watch plant species." "The Johnson Creek Route Alternative would impact 3,203.6 acres of modeled potential habitat for sensitive and forest watch plant species. " and "The Johnson Creek Route Alternative would impact 3,203.6 acres of modeled potential habitat for sensitive and forest watch plant species. " Please check and clarify how these numbers of acres are larger or nearly so than the total acres of vegetation cleared in the rows below. Providing a total number of acres of modeled potential habitat results in double counting areas that are considered potential habitat for multiple species. Please correct.
Wetlands and Riparian Resources	270	3-243	3.11.2	2	PRII	"Wetlands were not evaluated within the larger surrounding watersheds for the off-site corridors or areas not associated with the SGP. " Please verify. This statement appears inaccurate as Table 3.11-1 identifies many more acres of wetlands than PRII provided in delineations conducted by their contractors in the off-site mine focus area.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wetlands and Riparian Resources	271	3-246	3.11.4.1	5	PRII	"Operations Area Boundary" - Section 3.11.2 identifies a mine site focus area and an off-site focus area. Figure 3.11-1 does not identify these areas and needs clarity for the analysis area for this resource. Suggest making the connections between the mine site focus area and the Operations Area Boundary more clear in the text and figures in this and following sections.
Wetlands and Riparian Resources	272	3-248	3.11.4.3	Table 3.11-1	PRII	Total Acres for Off-Site Focus Area - Please clarify how this acreage was calculated. It appears that NWI information was added and should be cited as such. HDR and TT did not provide this many delineated acres of wetlands; in fact, the analysis area for wetland delineations conducted by HDR and TT produced 807 delineated acres of wetlands that included both the mine site focus and off-site focus areas (CMP 2022).
Wetlands and Riparian Resources	273	3-250	3.11.4.4	Table 3.11-2	PRII	Off-Site Focus Area/RCA acres - The number of perennial and non-perennial stream feet for the off-site focus area appears incorrect. PRII would expect the off-site focus area to have considerably more feet of stream and the mine site focus area to have considerably more acres of RCA, even considering footnote #2. Please check numbers in the table.
Wetlands and Riparian Resources	274	3-250	3.11.4.4	Table 3.11-2	PRII	Footnote 1 reference - Please correct the reference list for baseline studies to include all applicable documents. For example, the Tetra Tech reference is a summary of data gap work conducted in 2018 and 2019, and should be one of several references for this footnote.

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Wetlands and Riparian Resources	275	3-256	3.11.4.5	4	PRII	From this sentence: " <i>Per the assessments conducted by HDR and Tetra Tech, 1 of the 21 evaluated wetland AAs rated as Category IV, 17 rated as Category III, and 3 rated as Category II (Tetra Tech 2021c, Forest Service 2022h; Figure 3.11-2).</i> " - Please clarify the relevance of this particular figure reference. Alternatively, this could reference the technical report that presents the series of figures that show all 21 AAs.
Wetlands and Riparian Resources	276	4-306	4.11.1	3	PRII	"Qualitative analysis..." is not an indicator. Please rephrase. What indicator and analysis for fragmentation was used?
Wetlands and Riparian Resources	277	4-306	4.11.1	4	PRII	" <i>The SGP may affect water balance, which could reduce seasonal water input frequency ...</i> ". The way this is phrased makes it seem like a biased indicator; what if there are increases in seasonal input? Please reconsider how this indicator is phrased.
Wetlands and Riparian Resources	278	4-307	4.11.2.1	2	PRII	Please discuss the Perpetua ASAOC project under the no action alternative here as it is in many of the other resources.
Wetlands and Riparian Resources	279	4-307	4.11.2.2	4	PRII	" <i>Losses of wetland and riparian areas and their functions would occur throughout the construction and operation phases.</i> " - This fails to characterize wetland and riparian areas as temporal losses that are mitigated by the Compensatory Mitigation Plan activities. Please include discussion of mitigation of temporal effects.
Wetlands and Riparian Resources	280	4-307	4.11.2.2	5	PRII	" <i>The magnitude of impacts would be major (i.e., a large measurable change), localized, and the impacts would range from temporary to permanent</i> ". As in comments above, it should be clarified here that these impacts would be mitigated for through the implementation of the CMP.

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wetlands and Riparian Resources	281	4-308	4.11.2.2	1	PRII	"Acres of wetlands and RCAs that would be directly impacted in the off-site focus area under the 2021 MMP are shown in Table 4.11-2 and by HUC 10 drainage basin in Table 4.11-3 ." - Suggest adding figures illustrating these areas listed in tables.
Wetlands and Riparian Resources	282	4-308	4.11.2.2	1	PRII	"The greatest impacts in areas outside the mine site would occur in the Johnson Creek watershed, with fewer impacts in the other watersheds". Seems non-intuitive: please verify that the JC water shed would have greater impacts under the Burntlog Route alternative (MMP).
Wetlands and Riparian Resources	283	4-308	4.11.2.2	3	PRII	"Wetland functional units that would be loss due to direct impacts and indirect impacts due to wetland conversion are presented in Table 4.11-4 ". Gains/losses of wetlands should be provided by separate categories, as direct impacts are certain, and indirect impacts are not certain...they "may" occur. Also, this is presenting confusing data as wetland conversion is not explicitly explained. The fact that "tree clearing in RCAs could not be quantified" should be explicitly stated here and not relegated to a small footnote in the table 4.11-4.
Wetlands and Riparian Resources	284	4-308	4.11.2.2	3	PRII	"distance to roadways ..." - Please explain why "distance to roadway" is important and how it is considered or delete this reference. In Section 3.11, and 4.11, this sentence is the only occurrence, which is repeated in Section 4.11, again with no explanation.
Wetlands and Riparian Resources	285	4-309	4.11.2.2	Table 4.11-1	PRII	"2021 MMP Impacts to Wetlands, Streams, and RCAs in the Mine Site Focus Areas" - Needs to say "Direct" impacts or else misleading. Please revise.

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Wetlands and Riparian Resources	286	4-313	4.11.2.2	Table 4.11-2	PRII	Table 4.11-2 footnote 3 - The indicators call for permanent and temporary impacts to be identified and discussed. Suggest that permanent and temporary impacts should be split out and discussed separately since the mitigation focuses on permanent and temporal losses, which are different than temporary losses.
Wetlands and Riparian Resources	287	4-315	4.11.2.2	Table 4.11-4	PRII	<i>Impacted Habitat Value Total</i> - This table is misleading in terms of the total project impacts. A previous paragraph indicates that 414 functional units that are included in this number are from temporary impacts. This table should be modified to include a column that lists and summarizes the temporary impacts by AA as well.
Wetlands and Riparian Resources	288	4-315	4.11.2.2	Table 4.11-4	PRII	Table 4.11-4 footnote 3 - See previous comment on permanent vs temporary impact. PRII is proposing to mitigate all permanent impacts. Defining and reporting the different impact types (direct, indirect, temporary, temporal) allows the reader to better understand the overall impacts, rather than summing all impacts together. Section 6.2 of the CMP clearly defines these impacts and quantifies them as they relate to project disturbance, where possible.
Wetlands and Riparian Resources	289	4-315	4.11.2.2	1	PRII	This paragraph should have a header related to the roads indicator. Please revise. To define the impacts for duration and intensity as defined by table 4.1-1.
Wetlands and Riparian Resources	290	4-316	4.11.2.2	3	PRII	" <i>New roads would bisect 39 total individual wetlands . Fragmentation effects could occur as a result of these impacts</i> " - Please clarify whether these impacts occur on site or off-site. Also, impacts for duration and intensity should be defined consistent with Table 4.1-1.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wetlands and Riparian Resources	291	4-316	4.11.2.2	4	PRII	<p>"Alteration of Wetlands and Riparian Areas Due to Changes in Water Balance " - Section 4.8 Surface and Groundwater Quantity and Section 4.11 Wetlands and Riparian Resources both use groundwater drawdown as an important part of impact characterization. Section 4.8 refers to streams and wetlands and groundwater dependent ecosystems (GEDs) (Impacts to Groundwater Dependent Ecosystems) and Section 4.11 (Alteration of Wetlands and Riparian Areas Due to Changes in Water Balance) does not use this terminology at all, and only addresses wetlands, and not streams. The part of Section 4.11 that addresses groundwater drawdown effects on wetlands does not specifically reference Impacts to Groundwater Dependent Ecosystems. As a result, there are two sections that analyze the same thing, but are independent and present things differently.</p> <p>Suggest removing analysis of groundwater dependent resources out of 4.8 (since it includes more resources) and integrate it into 4.11 and make the terminology consistent.</p>
Wetlands and Riparian Resources	292	4-316	4.11.2.2	4	PRII	<p>" ...was estimated based on groundwater modeling. " - Please clarify the estimated impacts, how they are defined and the impacts for duration and intensity as defined by table 4.1-1. Also, A figure indicating where these indirect impacts would occur on the project (Yellow Pine Pit, Hanger Flats Pit...) would be helpful.</p>
Wetlands and Riparian Resources	293	4-317	4.11.2.2	1	PRII	<p>"direct permanent impacts on water quality". - Please clarify what the impacts are, or refer to a section that defines them.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wetlands and Riparian Resources	294	4-319	4.11.2.3	Table 4.11-6	PRII	Footnote 3 - Suggest that permanent and temporary impacts be split out and discussed separately as the mitigation focuses on permanent and temporal losses, which are different than temporary losses.
Wetlands and Riparian Resources	295	4-320	4.11.2.3	Table 4.11-7	PRII	Footnote 3 - Suggest that permanent and temporary impacts be split out and discussed separately as the mitigation focuses on permanent and temporal losses, which are different than temporary losses.
Wetlands and Riparian Resources	296	4-321	4.11.2.3	Table 4.11-8	PRII	<i>Impacted Habitat Value Total</i> - This table is misleading. A previous paragraph indicates that 414 functional units that are included in this number are from temporary impacts. This table should be modified to include a column that lists and summarizes the temporary impacts by AA as well.
Wetlands and Riparian Resources	297	4-322	4.11.3	4	PRII	<i>Mitigation Measures</i> - This section should address the Compensatory Mitigation for Losses of Aquatic Resources under CWA Section 404 (Final Rule) and that the USACE must permit the least environmentally damaging practicable alternative. Please revise.
Wetlands and Riparian Resources	298	4-322	4.11.3	4	PRII	"These mitigation measures..." - Please clarify what "mitigation measures" are being referred to here.
Wetlands and Riparian Resources	299	4-323	4.11.3	1	PRII	"The current CMP describes an accounting process for tracking the various wetland impacts (losses) and associated wetland mitigation (gains)". Section 4.11.3 does not include discussion on mitigation proposed for effected streams. The CMP details mitigation proposed for streams, many of which are WOTUS (Waters of the United States) and will require compensatory mitigation. If this is discussed in another section, please refer the reader to it.

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Wetlands and Riparian Resources	300	4-323	4.11.3	1	PRII	"The ledger system also provides a way to track and assess temporal effects, which as described in Section 4.11.2 ..." - Temporal effects are not described in Section 4.11.2. Please revise to include a discussion of temporal effects.
Wetlands and Riparian Resources	301	4-323	4.11.3	3	PRII	In this paragraph, we suggest it is worth noting that the current CMP identifies nearly 1000 residual wetland functional credits, nearly 1.5 times more credits than are needed for compensatory mitigation.
Wetlands and Riparian Resources	302	4-324	4.11.5	3	PRII	We suggest that this section may include a summary table of wetlands and RCA issues and indicators by alternative and by assessment area (on site and off-site). Additionally, these impacts should also be described by intensity and duration as described in Table 4.1-1. This would allow the reader to determine which action alternative is more impactful to wetlands and riparian areas.
Wetlands and Riparian Resources Specialist Report	303	18	5.0	2	PRII	"The most recent report, Tetra Tech (2021a)...". This reference should be Tetra Tech 2021c.
Wetlands and Riparian Resources Specialist Report	304	18	5.0	2	PRII	"This resulted in 21 AAs and is explained in further detail in Tetra Tech (2021a)". This reference should be Tetra Tech 2021c.
Wetlands and Riparian Resources Specialist Report	305	21	5.2	5	PRII	"All other wetland AAs (11-14, 16-18, and 21)... " - Recommend calling out which AAs are on which figures (5-3a-f, 5-4a-h and Figure 5-5a-o).
Wetlands and Riparian Resources Specialist Report	306	55	6.1.2	Table 6-1	PRII	The presented Total (Acres) values do not match the numbers in the CMP.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wetlands and Riparian Resources Specialist Report	307	56	6.1.2	Table 6-2	PRII	Please re-evaluate and correct the citations for the sources for the data in Table 6-2. For example, PRII did not conduct delineations in the Gold Fork River; these data appear to be from the NWI. That is the case for many of the acreages represented in this table.
Wetlands and Riparian Resources Specialist Report	308	57	6.1.2	Table 6-3	PRII	Please re-evaluate and correct the citations for the sources for the data in Table 6-3.
Wetlands and Riparian Resources Specialist Report	309	59	6.1.3	Table 6-4	PRII	Please verify the number of perennial and non-perennial stream feet for the off-site focus area. Assuming similar ratios that are represented in Table 6-3 for wetlands, off-site focus area would be expected to have considerably more feet of stream.
Wetlands and Riparian Resources Specialist Report	310	69	7.2.1	2	PRII	"Wetland and riparian losses would be most substantial within the mine site focus area, where both action alternatives would remove approximately 28 percent of the existing wetlands within the contributing basin for the East Fork SFSR watershed above the Sugar Creek/East Fork SFSR confluence ." - Please correct this inaccurate statement. Not all of the wetlands in the EFSFSR watershed were officially delineated. This calculation likely is using a mix of on-the-ground delineations and NWI data (which typically underestimate wetlands). Consider rephrasing this statement to say something like "Of the delineated wetlands in the EFSFSR watershed above Sugar Creek EFSRSR confluence, xx% of wetlands would be removed."
Wetlands and Riparian Resources Specialist Report	311	69	7.2.1	4	PRII	"The USACE is working with Perpetua to address wetland impacts through compensatory mitigation, as described in Section 7.3.1 and Tetra Tech (2021c). " - Tetra Tech 2021c is the Functions and Values document, not the CMP. Please cite Tetra Tech 2021a if referring to the CMP.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wetlands and Riparian Resources Specialist Report	312	79, 81	7.2.3.1	Table 7-4	PRII	Total Wetland Impact acreage reported in Table 7-4 (page 79 and page 81) do not match CMP tables 6-6a and 6-6b.
Wetlands and Riparian Resources Specialist Report	313	83	7.2.3.2	1	PRII	"An estimated total of 1,054.4 wetland functional units would be lost, approximately 375.9 of which would be due to impacts to high value wetlands" - We have included a comment in the attached letter regarding the total impacts to wetlands: the value is incorrect and causes this number to be incorrect and overstates the impact. Please revise.
Wetlands and Riparian Resources Specialist Report	314	83	7.2.3.2	1	PRII	"Functional loss due to other indirect effects, including changes in hydrology, water quality, and increase dust and/or mercury deposition has been examined through inspection of dewatering drawdown and distance to roadways" - Please explain why "distance to roadway" is important and how it was considered or delete this reference.
Wetlands and Riparian Resources Specialist Report	315	84	7.2.3.2	Table 7-6	PRII	The Totals values presented in Table 7-6 do not match with tables 7-2a and 7-2b in the CMP.
Wetlands and Riparian Resources Specialist Report	316	84	7.2.3.3	1	PRII	"Under the 2021 MMP, the total extent of wetland losses would be approximately 119.8 acres at the mine site and 76.3 acres outside the mine site." - Please provide where this specific reference is coming from in the MMP.
Wetlands and Riparian Resources Specialist Report	317	90	7.2.4.2	1	PRII	"An estimated total of 1,028.3 wetland functional units would be lost," - We have included a comment in the attached letter regarding the total impacts to wetlands; the value is incorrect and causes this number to be incorrect and overstates the impact. Please revise.
Wetlands and Riparian Resources Specialist Report	318	91	7.2.4.2	Table 7-10	PRII	The Totals values presented in Table 7-10 do not match tables in the CMP.

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Wetlands and Riparian Resources Specialist Report	319	102	7.4.4	3	PRII	"The 2021 MMP would result in temporary and permanent losses of approximately 119.8 acres of wetlands in the mine site focus area (Table 7-3), 76.3 acres outside the mine site (Table 7-4), and 1,054.4 wetland functional units (375.9 of which would be high-value functional units) (Table 7-6). " - Please see previous comments on incorrect wetland acreage impacts. Please revise.
Wetlands and Riparian Resources Specialist Report	320	A-6	APP A	Table A-2, p A-6	PRII	The Total for Proposed Wetland Removal Acres (188.0) is not the number represented in the Nov 2021 CMP tables 7-2a and 7-2b. That means the number of functional units affected is also incorrect. Please revise.
Wetlands and Riparian Resources Specialist Report	321	A-8	APP A	Table A-3, p A-8	PRII	The Total for Proposed Wetland Removal Acres (181.2) is not the number represented in the Nov 2021 CMP tables 7-2a and 7-2b. That means the number of functional units affected is also incorrect. Please revise.
Wildlife	322	4-388	4.13.2.1	3	PRII	"There have been no recent observations ..." Recent observations is relative and should be quantified with years since last lynx sighting in the area.
Wildlife	323	4-388	4.13.2.1	4	PRII	"While modeled habitat for the NIDGS occurs in the region, no NIDGS are known or estimated to occur in the Operations Area Boundary, thus no current impacts are occurring or would occur under the No Action Alternative in this area. " This same logic (here applied to the No Action Alt) should then be used for the 2021 MMP and JC Alternatives.
Wildlife	324	4-388	4.13.2.1	4	PRII	"As depicted by modeled habitat, there is a possibility that NIDGS may occur in existing utility corridors ". This statement conflicts with the first statement in this section and is inaccurate; the utility corridor WAS surveyed and NO NIDGS were observed. Please clarify this for the reader.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Wildlife	325	4-388	4.13.2.1	5	PRII	"Existing roads also would continue to affect wolverines through habitat fragmentation and vehicle- wildlife collisions . " If there is documented wolverine mortality due to vehicles it should be mentioned here.
Wildlife	326	4-393	4.13.2.2	4	PRII	"The analysis of potential indirect effects on threatened, endangered, proposed, and candidate species includes fragmentation of habitat; increased competition for resources or habitat due to displacement of individuals from the affected area into the territory of other animals; or other effects, such as increased human presence in the species-specific analysis areas (e.g., hunters, trappers, and recreationists) that can cause mortality (i.e., illegal hunting or trapping) or reduced breeding and recruitment in the future population ". It does not seem appropriate for the NEPA process to include illegal activities as part of effects analysis. Suggest removing.
Wildlife	327	4-395	4.13.2.2	1	PRII	"Therefore, based on the impact analysis for the Canada lynx and its habitat, the 2021 MMP would result primarily in localized, long-term, and permanent, minor impacts to the Canada lynx ". Lynx have not been recently using these area (4.13.1.2 above). Therefore this statement should only refer to the habitat not the lynx. Please consider revising this statement.

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Wildlife	328	4-395	4.13.2.2	2	PRII	"therefore, it is likely that the Operations Area Boundary area would be a barrier to lynx movement, which would be a direct effect ". Given the Operations Area Boundary only directly overlaps a small portion of modeled suitable habitat (Fig 3.13-2) this statement should indicate only a portion of the habitat could be a barrier. Also, this statement contradicts the statement above in the same paragraph regarding displacement around the perimeter of disturbance which implies the mine disturbances would not be a movement inhibiting barrier. Please note also that the Operations Boundary is not a physical barrier, but rather one established well beyond the limits of surface disturbance and operations for the purpose of air quality modeling. Please consider revising this statement.
Wildlife	329	4-397	4.13.2.2	4	PRII	Please clarify that the NIDGS survey was conducted along the transmission line and access roads. Although it is not mentioned, please confirm that it was used in the analysis. The survey in this area is mentioned below in Access Roads & Utilities Section.
Wildlife	330	4-397	4.13.2.2	4	PRII	Large tracts of the modeled habitat were field surveyed and found to be unsuitable habitat. This map and analysis appears to not have taken these field surveys into consideration and continues to rely on the GIS models for habitat impact analysis. Please clarify this in the text.
Wildlife	331	4-397	4.13.2.2	4	PRII	Prior to the execution of the NIDGS habitat surveys, the USFS/USFWS agreed (prior to the survey) that 100 meters was sufficient for a buffer. Use of a 1-mile buffer for effects analysis thus seems inappropriate here. Please clarify the use of the 1-mile buffer in the text.

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Wildlife	332	4-397	4.13.2.2	5	PRII	"Therefore, based on the impact analysis for the NIDGS and its habitat, the 2021 MMP would result primarily in localized, temporary, and short-term, minor impacts to the NIDGS" As with lynx, this statement should clarify implied impacts based on modeled habitat and not direct impacts on the species. Please clarify this in the text.
Wildlife	333	4-398	4.13.2.2	1	PRII	Applying migration into modeled habitat for the action alternatives and not the No Action Alternative seems inconsistent, particularly since the roads discussed already exist. Please clarify this in the text.
Wildlife	334	4-398	4.13.2.2	1	PRII	"the 10.4-mile groomed OSV trail along the existing Cabin Creek Road (FR 467) and the new 7-mile temporary groomed OSV trail along Johnson Creek Road would occur in and near close proximity to modeled habitat for NIDGS but would be unlikely to affect NIDGS due to its seasons (i.e., late fall and winter) of use " The Yensen survey indicates NO NIDGS habitat was observed in the survey along the OSV route. Please clarify this in the text.
Wildlife	335	4-398	4.13.2.2	2	PRII	"(43 miles of Burntlog Route and utility access roads) may act as a barrier to squirrel movement and dispersal". Please delete, previous statement indicates no modeled habitat along BL Route
Wildlife	336	4-398	4.13.2.2	2	PRII	"Increased habitat fragmentation between colonies could indirectly impact dispersal between populations, which could lead to genetic and demographic consequences". Please delete, this is a speculative statement about populations that were not confirmed in modeled habitat.

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Wildlife	337	4-398	4.13.2.2	2	PRII	"The existing (23 miles of NFS roads and 75 miles of county roads) and new roads (43 miles of Burntlog Route and utility access roads) may act as a barrier to squirrel movement and dispersal ". This statement (in part) contradicts the previous statement which indicates no modeled habitat along BL Route. Suggest deleting .
Wildlife	338	4-398	4.13.2.2	3	PRII	"Construction of the utility corridors, substations, and communication towers, as well as maintenance activities in the ROWs, would likely impact individual NIDGS where the 2021 MMP components overlap modeled habitat known to support populations " This statement is conclusive and is contradictory with field surveys that have not identified individuals of this species in modeled habitat. Please correct or remove.
Wildlife	339	4-398	4.13.2.2	3	PRII	"but there is a possibility that NIDGS may occur in the future at suitable sites " This is a speculative statement that is not supported by documented nearby populations, identification of migration pathways or environmental stressors that would induce such migration. Please remove.
Wildlife	340	4-402	4.13.2.2	1	PRII	"The year-round maintenance and winter plowing of the Burntlog Route could potentially open new and more remote areas for other predators, such as wolves or coyotes, which could indirectly increase the competition for food resources with wolverines " Without further explanation or supporting information regarding use of roadways by wolves/coyotes, this statement is speculative and should be supported or removed.

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Wildlife	341	4-403	4.13.2.2	1	PRII	"due to the low potential for this species to occur in the wildlife analysis area, primarily due to a lack of suitable habitat, the 2021 MMP would not likely contribute to a trend towards ESA listing or loss of viability of the species within the planning area." This statement, supports our suggested changes to the previous 2 pages of discussion that were focused on potential impacts to a species that is not likely to be present.
Wildlife	342	global	4.13.2.2	1	PRII	Moderate intensity per Table 4.1-1 in Section 4.1.2 "affects a large percentage of a population" and lead to reduction in "productivity in the overall population." Evidence is not provided that leads a reader to this conclusion. Request changing to "minor" (for this and other species where the same conditions occur, e.g. big-game species).
Wildlife	343	global	4.13.2.2	1	PRII	(reference to illegal hunting) - It is unclear why the NEPA process is analyzing illegal behavior. Illegal behavior is not a result of the MMP and should not be part of the analysis. Suggest removing.
Wildlife	344	4-433	4.13.2.2	5	PRII	"Fragmentation of habitat" for bighorn sheep is not supported by citations, whereas wolverine and Lynx have several references. Please provide references or remove speculative statement for bighorn sheep.
Wildlife Specialist Report	345	31	5.2.4	applies to Section	PRII	The analysis area buffers are not defined or justified in these sections below for TEPC species. Recommend providing.
Wildlife Specialist Report	346	32	5.2.4.4	2	PRII	The analysis area for the Monarch butterfly should be limited to elevations at or below 5,600 ft amsl.
Wildlife Specialist Report	347	40	6.2	5	PRII	Of the four TEPC species, only wolverine have been sighted in the area. This should be clarified in this opening paragraph and the nature of "modeled habitat" versus confirmed species presence should be clarified in this introduction.

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Wildlife Specialist Report	348	40	6.2	5	PRII	"NIDGS, which is listed as a threatened species under the ESA, are known to occur in the region." This statement should be clarified as to what encompasses "region". The NIDGS ground surveys during baseline surveys which included modeled habitat and buffer zones (100 m) approved by USFS and USFSWS did not yield any observations of NIDGS.
Wildlife Specialist Report	349	42	6.2.2.2	5	PRII	"modeled NIDGS habitat " Recommend providing a footnote or short description in this paragraph as to what modeled habitat means.
Wildlife Specialist Report	350	108	7.2.1.2	2	PRII	"While modeled habitat for the NIDGS occurs in the region, no known observations of NIDGS or modeled habitat occur in the mine site area" This is true, and appears to be contradictory to statement in Section 6.2.
Wildlife Specialist Report	351	110	7.2.1.2	Table 7-3	PRII	Please clarify in this table that not all modeled habitat was considered suitable and/or highly or even moderately suitable.
Wildlife Specialist Report	352	111	7.2.1.2	5	PRII	"Therefore, based on the impact analysis above for the NIDGS and its habitat, the action alternatives would result primarily in localized, temporary, and short-term, minor impacts to the NIDGS " This is a speculative conclusion that is inconsistent with previous statements within this Section. No NIDGS found, no DCH, only some modeled habitat deemed suitable. Above in baseline, they list the few locations where habitat determined highly suitable. It is highly speculative that any impacts to NIDGS would occur.
Wildlife Specialist Report	353	114	7.2.1.3	2	PRII	"An increase in big or small game collision mortality along roadways would be likely..." This should say "could" instead of "would".

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Wildlife Specialist Report	354	198	7.2.2.10	4	PRII	"However, it is possible that nests, eggs, and young could be directly disturbed by vegetation removal (including cutting of trees)." There project design features stating that pre-construction surveys will be conducted to minimize this impact. This should be considered and clarified.
Timber	355	3-381	3.14.1	4	PRII	"Timber resources are the trees used to develop merchantable forest products. Forest products include timber products, such as lumber, paper, and firewood, and other "special forest products," such as floral greenery, Christmas trees, medicinal herbs, fungi, and other natural products (Forest Service 2017e). Timber resources in the SGP area consist of conifer tree species typically harvested to make forest products, including merchantable sawtimber-sized trees and sub-merchantable small trees. " This is not the definition of timber resources used in the cumulative impacts. That seems to only be directed at commercial timber. Please reconcile these 2 sections.
Timber	356	4-461	4.14.1	3 (bulleted list)	PRII	" Volumes and acres of timber resources removed. " Please specify how volume is measured and what it means.
Timber	357	4-462	4.14.1.1	1	PRII	"Timber volumes presented in the discussions are distinguished between sawtimber and sub-merchantable trees; however, a breakdown by species is not provided ." If a breakdown of timber species is not considered it must be presumed that Whitebark Pine is considered as a timber resource impacted by the project. If this is the case the WBP volume should not be considered as a marketable timber loss because those stands would not be targeted for harvest. Please revise to address WBP.

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Timber	358	4-462	4.14.1.2	4 (bulleted list)	PRII	"Beyond the limitations associated with VCMQI mapping accuracy on NFS lands, these data were not available for portions of the SGP area on private , state, and other federal land. To characterize vegetation in these areas , publicly available vegetation community LANDFIRE data with a 30-square-meter minimum mapping unit were manually translated ("cross-walked") to the closest corresponding NFS vegetation dominance type. LANDFIRE data are not ground-truthed; therefore, vegetation conditions on private , state, and other federal land may be less accurately represented than conditions on NFS lands ." Please clarify whether timber acres on private lands were included in the analysis. If so, please clarify why other resources on private land were excluded (e.g.: soils)? Please reconcile.
Timber	359	4-464	4.14.2	1	PRII	"Therefore, indirect effects on timber resources are anticipated in all portions of the SGP area where timber removal would occur. " If there are indirect effects on forest that are directly affected by removal are being included in the impact analysis, this could result in a double impact analysis approach. Please revise to indicated that impact areas are only analyzed once.
Timber	360	4-465	4.14.2.2	1	PRII	"The analysis area under the 2021 MMP contains 54 acres of land suited for timber production, which is associated with the existing transmission line upgrade (within BNF MPC 5.1 and 4.2) and contains 206 MBF of sawtimber. " If these 54 acres are a culmination of the narrow strips on each side of the T-Line ROW expansion this should be noted as opposed to an actual 54 acre area readily available for timber production and harvest.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Timber	361	4-467	4.14.2.2	2	PRII	"Most disturbed areas planned for timber resource reclamation would not be prepared with GM or planted until operations are complete, including the Midnight GMS area, haul roads, the Yellow Pine pit walls, and North Yellow Pine GMS ." These GMS are carryover from the 2020 DEIS. The MMP has only one GMS in Fiddle Valley. Please delete.
Timber	362	4-468	4.14.2.2	1	PRII	"Timber productivity generally correlates with soil depth and quality, which implies that the shallow depth of GM (6 inches) applied in most uplands where timber replanting is planned at final reclamation would likely limit native forest production. " Please provide a source for this information.
Land Use and Land Management	363	3-397	3.15.1	2	PRII	"The analysis area for land use and land management includes the combined footprint of all potential components for the SGP including the Operations Area Boundary, the access routes, transmission line infrastructure, and off-site facilities. The analysis area and land status are shown in Figure 3.15-1 ." The figure labels the "Analysis Area" as an orange polygon separate from the hatched "Operations Area Boundary". As a result, the analysis area from the text is the Figure "analysis area" plus the "operations area boundary". Please revise the map legend to show the orange as "combined footprint" or something similar for clarity, with another indication in the figure legend to show that the orange and hatched polygons are both the analysis area.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Land Use and Land Management	364	3-397; 3-398	3.15.1	2; 1	PRII	<p><i>"The analysis area for land use and land management includes the combined footprint of all potential components for the SGP including the Operations Area Boundary, the access routes, transmission line infrastructure, and off-site facilities. The analysis area and land status are shown in Figure 3.15-1. The SGP primarily consists of NFS lands on the PNF and the BNF with some private, state, and BOR lands also included. Land use in the analysis area consists of mining uses, utilities, roads, agriculture, residential, fisheries, timber, tribal, recreational, and special uses. The discussion of existing conditions provides a land use context for the collective SGP area that could be impacted by the action alternatives."</i></p> <p>AND</p> <p><i>"The analysis area for land use and land management includes the combined footprint of all potential components for the SGP, including Operations Area Boundary, access and haul roads (proposed and existing), utility infrastructure (proposed and upgraded), and off-site facilities (Figure 2.4-1)."</i></p> <p>These two paragraphs are redundant, but cite different figures. Please consolidate and reconcile to simplify for the reader.</p>
Land Use and Land Management	365	3-400	3.15.4.1	Table 3.15-1; Footnote 1	PRII	<p><i>"Approximately 14 acres of land listed under the PNF is administered by the PNF but is within the boundary of the Salmon- Challis National Forest. Does not account for 67 acres of temporary surface exploration pads and roads on Payette National Forest (see Chapter 2 acreage tables)." Table 2.4.1, sub bullet 2, indicates 65 acres. Please revise for consistency and check for accuracy.</i></p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Land Use and Land Management	366	4-475	4.15.2.2	1	PRII	"Public access to NFS lands within the Operations Area Boundary would be closed for timber harvest and designated tribal uses (Sections 4.14 and 4.24). " Based upon the 2003 Land and Resource Management Plan, the management prescriptive category for the operations area boundary consists of category 3.1 and 3.2 (passive and active restoration, respectively) both of which have been identified as "not suited for timber production." Timber harvest should not be considered an activity that is limited by the project since it is not a viable existing activity. Please delete " timber harvest and "
Land Use and Land Management	367	4-475	4.15.2.2	4	PRII	"Due to year-round access to the mine site first along Johnson Creek Route during construction and then along the Burntlog Route, an existing, approximately 11-mile groomed OSV route from Warm Lake to Landmark would be closed ." A new groomed snowmobile route along the Cabin/Trout Creek drainage to Johnson Creek would be maintained from a maintained parking area off the South Fork Road. Please include this information.
Land Use and Land Management	368	4-475	4.15.2.2	6	PRII	"Temporary closure of the existing 9-mile OSV route from Trout Creek campground to Wapiti Meadows under the 2021 MMP, during use of the Johnson Creek Route while Burntlog Route is constructed, would convert the land use from mainly recreation to mining transportation use for the short term. " Only during the winter season. Please revise to read "...would convert the land use in the winter season from mainly recreation..."

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Land Use and Land Management	369	4-476	4.15.2.2	3	PRII	"The construction and operation of the new road segment for the Burntlog Route would introduce new motorized access to an area where it currently does not exist ." Recommend revising. In no case are the new segments of the BLR more than a mile from existing roads/trails and in most instances much closer.
Land Use and Land Management	370	4-476	4.15.2.2	Table 4.15-3	PRII	"JCR OSV trail during operations; 7.82 miles: 15.1 acres " This isn't a "new" use, but an existing use that gets returned following use of the JCR during construction. Please delete from table.
Land Use and Land Management	371	4-477	4.15.2.2	8	PRII	"The new ROW corridor is considered a direct effect to land use, changing these areas from undeveloped land to a utility use during construction, operation, and closure and reclamation. " Please clarify that this is not wholly "undeveloped land". While not currently an active Power Line easement, a portion of this alignment was a powerline previously, as evident by historic power poles, guy wires and line on the landscape. Please revise.
Land Use and Land Management	372	4-478	4.15.2.2	1	PRII	"Recreational use and recreational special use areas adjacent to a new ROW could change due to increased access from new maintenance access roads ." No new maintenance access roads, that are open to the public, are proposed so there will be no change in access. Please revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Land Use and Land Management	373	4-479	4.15.2.2	1	PRII	"The disturbance area for the tower would be approximately 30 feet by 60 feet, including all required equipment, and would be near the Meadow Creek Lookout, on a summit east of Blowout Creek drainage, or near the proposed transmission line alignment upslope of the proposed Hangar Flats pit . " Please replace " and would be near the Meadow Creek Lookout, on a summit east of Blowout Creek drainage, or near " with " and would be northeast of the Meadow Creek Lookout on a summit on or near "
Land Use and Land Management	374	4-481	4.15.2.3	1	PRII	"Access for cell tower and VHF repeater sites in IRAs managed for Backcountry /Restoration would be via helicopter under the Johnson Creek Route Alternative ." Cell tower and VHF repeater locations do not change (with the exception of the one VHF site located at the road maintenance facility). Access to these sites would continue to be via existing road to the MC lookout or via the powerline maintenance road and not via helicopter . Please revise and remove reference to helicopter.
Land Use and Land Management	375	4-482	4.15.2.3	2	PRII	"Land use impacts from communication towers and repeater sites would be similar to those described under the 2021 MMP, except the repeater sites would be located along Johnson Creek Route ." Only the Maintenance facility repeater site is relocated. All others remain the same. Please change " repeater sites " to " the one relocated repeater site ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Land Use and Land Management	376	4-482	4.15.4.1	5	PRII	"Land use would be altered permanently in the mine site. An area that has been historically used for mining would, after the closure of the mine and reclamation of the site, no longer be used for mining ; this would be considered an irreversible commitment of land use. " Please clarify why this would be the case or remove this statement. It is always possible that an area could be used for mining in the future. The SGP is an example of that.
Land Use and Land Management	377	4-482	4.15.4.1	5	PRII	"Areas where specific land uses for the action alternatives would be converted from their original land uses, such as recreational (including special uses), tribal, and timber harvests, to mining uses would be considered an irretrievable commitment of land use , because these areas would not be available for other land uses during the life of the SGP for any of the action alternatives. " An irretrievable commitment by definition lasts into perpetuity. Following reclamation there is the opportunity for tribal, recreational, timber harvest and mining uses to remain. Please replace " an irretrievable commitment " with " a long term commitment " or " a several decades long commitment "
Access and Transportation	378	4-483	4.16.1	5	PRII	Rail air and water not discussed in Chapter 3. Outside of the analysis area. Please remove.
Access and Transportation	379	4-487	4.16.2.2	3	PRII	"public use would be allowed on Burntlog Route when other public access roads are blocked by mine operations "...Elsewhere in the SDEIS document, this condition is not indicated for public use of Burntlog. Please clarify.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Access and Transportation	380	4-488	4.16.2.2	2	PRII	"Warm Lake Road traffic would increase by 11.9 percent and SH 55 traffic would increase by only 4.0 percent. Heavy vehicles would comprise less than 2 percent of the total traffic on these two roadways; however, due to the one-lane constraints on both roadways, non-mine- related vehicles may experience slower travel times ." Warm Lake Road and SH55 are both 2 lane roads, please correct.
Access and Transportation	381	4-488	4.16.2.2	3	PRII	"Reconstruction of the transmission line along Warm Lake Road and Johnson Creek Road to the Operations Area Boundary is estimated to occur in the third and fourth years of construction and would overlap at the end of the 2021 MMP construction period ." This is incorrect; it is currently anticipated that the transmission line construction will occur in the first year of construction.
Access and Transportation	382	4-488	4.16.2.2	Table 4.16-2	PRII	Suggest clarifying the separation of the two segments SH55 to SGLF and SGLF to SGP; the reason being SH55 to SGLF captures the anticipated number of vehicles parking at the SGLF prior to boarding buses to SGP.
Access and Transportation	383	4-489	4.16.2.2	Table 4.16-2	PRII	It seems that the cell with the 703 value is incorrect; 135 seems the correct AADT value (70 existing + 65 construction). Please review.
Access and Transportation	384	4-490	4.16.2.2	4	PRII	The description of Burntlog Route as not being designated for public motor vehicle use is not consistent with other sections of the SDEIS which describe it as an " <i>alternative public access route</i> ". Please clarify the status of the Burntlog Route for public access.
Access and Transportation	385	4-490	4.16.2.2	6	PRII	"Approximately 13.5 miles of new private access roads would be created during the life of the mine." Please clarify the location and purpose of the described "new private access roads"

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Heritage Resources	386	4-501	4.17.1	3	PRII	"The SGP would impact historic properties through ground disturbing activities during construction, operation, and closure and reclamation phases." An impact(s) has not yet been defined in the documents. Please replace " would " with " may ".
Heritage Resources	387	4-501	4.17.1	6	PRII	"Number and location of above-ground historic properties, TCPs, and CLs that may have altered viewsheds as a result of the SGP activities." Please define " altered viewsheds " more specifically with respect to degree of alteration as this will inform whether it is negligible, minor, moderate or major.
Heritage Resources	388	4-502	4.17.1	1	PRII	"The SGP would create noise and vibration that could impact the soundscape, solitude experiences, and fragile standing or partially standing historic properties , TCPs, and CLs." Please provide a reference for the impact that noise and vibration would have to fragile standing or partially standing historic properties, particularly in contrast to the risk of weathering impacts, including snow loads. If there are none of these properties, please delete it from this list.
Heritage Resources	389	4-502	4.17.1	10	PRII	"The NEPA impacts definitions are provided in Table 4.17-1." These are not "...NEPA impact definitions ...", they are NEPA impact descriptions developed specifically for Heritage Resources for this EIS. Please provide this clarification.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Heritage Resources	390	4-503	4.17.1	2	PRII	"The assessments of potential effects to historic properties are presented in the context of Section 106 of the NHPA and focuses on the potential effects of each alternative on historic properties, which for purposes of this assessment includes those listed on or eligible for listing on the NRHP and those that have not yet been evaluated for listing on the NRHP and located within the defined APEs." This sentence fails to mention the required mitigation under Section 106, and therefore is only telling the impact side of the equation. Please add "and required mitigation" after "on the potential effects" .
Heritage Resources	391	4-504	4.17.2.1	4	PRII	"Ongoing activities associated with the CERCLA work per the current ASAOC would continue over the next few years would not affect any historic properties." Suggest including a reference from the ASAOC permits to support.
Heritage Resources	392	4-505	4.17.2.2	4	PRII	"Restricted access to the mine site area during construction, operations, and closure and reclamation would affect tribal access to important sites and resources, some that could be identified as TCPs and CLs." Please replace "would" with "may" .
Heritage Resources	393	4-505	4.17.2.2	3	PRII	"Restricted access to the mine site area during construction, operations, and closure and reclamation would affect tribal access to important sites and resources, some that could be identified as TCPs and CLs." Please define how "important" is determined.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Heritage Resources	394	4-505	4.17.2.2	5	PRII	"One site (10VY1488, the Stibnite Lithics site) could be adversely affected by the mine construction and operations. However, if the site could be avoided through siting redesign measures, the effect to the site would not be adverse." The project design takes this site into consideration and has a 500ft buffer around the identified site for any infrastructure or construction activities. Therefore, the site is being avoided and the effect would not be adverse. Please revise.
Heritage Resources	395	4-506	4.17.2.2	2	PRII	"Included in this route is the road connector to the Meadow Creek Lookout where VHF repeater site installation would occur which would have the potential to affect historic properties." There is already a USFS solar and antenna array at the site. The VHF repeater would not result in a larger effect on historic properties. Please revise.
Heritage Resources	396	4-506	4.17.2.2	3	PRII	"The proposed groomed OSV route on the west side of Johnson Creek Road between Warm Lake Road and Cabin Creek Road would require tree removal, which could potentially adversely affect culturally modified trees that may be present." Please define "culturally modified trees".
Heritage Resources	397	4-507	4.17.2.2	2	PRII	"A total of 43 historic properties as defined for this assessment are located within the APEs for the access routes associated with the SGP, including the Burntlog Route and Johnson Creek Road. None of the identified archaeological sites are within the Physical APE." Please delete "archaeological sites" in this sentence. This is the only place it is used in the section and making a distinction between archaeological sites and historic properties (used 55 times in this section) is confusing.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Heritage Resources	398	4-507	4.17.2.2	6	PRII	"Although the resource would not be physically impacted, the addition of communications equipment could create an adverse visual effect." This equipment would not create an adverse visual impact - it is installed adjacent to the larger existing Forest Service telecommunications facility located adjacent to the MC lookout. Please revise.
Heritage Resources	399	4-508	4.17.2.2	5	PRII	"However, the potential effects to potential TCPs and CLs should be evaluated if such historic properties are identified through future consultations with tribal partners." This should be the determination of the PA not the NEPA document. Recommend changing language to match that used about regarding "addressed in the PA".
Heritage Resources	400	4-509	4.17.2.2	1	PRII	"Impacts to heritage resources would be short term to permanent, localized, and minor to moderate depending on avoidance and mitigation." Please include that the process would be in compliance with Section 106 and the PA.
Heritage Resources	401	4-510	4.17.2.3	5	PRII	"Impacts to historic properties would be short term to permanent, localized, and minor to moderate depending on avoidance and mitigation." impacts have not yet been defined in the documents. Please replace " would " with " may ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Heritage Resources	402	4-512	4.17.4.2	5	PRII	"Historic properties that could be impacted by the SGP constitute an irreversible commitment, regardless of mitigation . Once gone, only the data collected remains; the resources cannot be used for any additional purposes. " This is inconsistent with the fact that mitigation will occur. Data collection and curation has value. The documentation can be studied again and in the future more research can be done, just like any collection and curation of archaeological resources. So at most it would be a partial irreversible commitment in which the "context" of these resources are lost. Please revise.
Heritage Resources	403	4-512	4.17.4.2	8	PRII	"Implementation of any action alternatives could result in an irretrievable commitment of historic properties if avoidance and mitigation measures of the SGP are not implemented . " Mitigation will be required under Section 106 and embodied in the PA. Please state that.
Heritage Resources	404	4-513	4.17.5.2	3	PRII	"If TCPs or CLs are identified, short-term use may be denied while protecting long-term productivity ." Please provide a reference to CFR's or other regulation allowing such a denial.
Public Health and Safety	405	4-513	4.18.1	5 (bulleted list)	PRII	"Changes in health metrics such as soil, air, and water quality ." Soil, air, and water quality are not health metrics. Please re-word this indicator.
Public Health and Safety	406	4-513	4.18.1	9 (bulleted list)	PRII	"Changes in soil, air, and water quality. " This indicator is too broad as it has no geographic or health related limits. Please add " relative to health thresholds from SGP activities " to end of sentence.
Public Health and Safety	407	4-513	4.18.1	9 (bulleted list)	PRII	"Psychological effects due to noise. " Not listed as an indicator in Table 1.10-1. If not analyzed, delete from here.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Public Health and Safety	408	4-515	4.18.2.1	2	PRII	" No impacts are anticipated to Public Health and Safety from the No Action Alternative as related to air quality, ground water, terrain, economy, public services and infrastructure, and demographics ." Existing condition impacts will prevail. Please replace " No impacts " with " No change to impacts "
Public Health and Safety	409	4-515	4.18.2.1	4	PRII	"The IDEQ may also identify goals towards developing a water quality improvement plan/total maximum daily loads for the East Fork SFSR. " Speculative in nature - please remove.
Public Health and Safety	410	4-515	4.18.2.2	6	PRII	"The highest combined pollutant annual emissions (including fugitive dust) were predicted to occur in Mine Year 7 (after up to 3 years of construction and pre-production activities and during the 4th year of mining). " The Specialist Report (page 94): The year of peak mine throughput, LOM Year 6, was found to have the highest aggregate pollutant emissions, including haze precursors, airborne dust, and HAPs. Table 7-31 of the specialist reports says: Emission inventories for construction through LOM Year 18 indicated that the peak year for aggregated pollutant emissions would be LOM Year 10, also the peak year for mine throughput. Please correct these inconsistencies.
Public Health and Safety	411	4-521	Table 4.18-3	First row, last three columns on this page	PRII	" <i>Magnitude of Impact:</i> <i>Construction and Operations: High; Closure and Reclamation: High;</i> <i>Possibility of Impact:</i> <i>Construction and Operations: Medium; Closure and Reclamation: Medium</i> " <i>Overall Impact on Public Health:</i> <i>Construction and Operations: Major; Closure and Reclamation: Major "</i> These values don't match up with the impacts of hazardous materials spills as outlined in section 4.7. Please reconcile.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Public Health and Safety	412	4-521	Table 4.18-3	Second row, 3rd column	PRII	"SGP Specifics: Increased power demand to support mine operations " Please add a line for rebuilt and more resilient power distribution, leading to reduction in service interruption intervals.
Public Health and Safety	413	4-522	4.18.2.2	1	PRII	"Thus, additional soil contaminants may be exposed during the construction and operation phases of the SGP ." Please include an acknowledgement of the soil contaminants that would be cleaned up as part of mine operations.
Public Health and Safety	414	4-523	4.18.2.2	3	PRII	"The IDEQ may also identify goals towards developing a water quality improvement plan/total maximum daily loads for the East Fork SFSR. " Speculative in nature - please remove.
Public Health and Safety	415	4-523	4.18.2.2	3	PRII	"However, existing groundwater in those areas typically does not meet regulatory criteria for use as drinking water due primarily to arsenic and antimony concentrations (Water Quality Specialist Report, Forest Service 2022f). " Please include information regarding the POC (Point of Compliance) for groundwater that would be permitted by IDEQ, as other permits are included.
Public Health and Safety	416	4-523	4.18.2.2	5	PRII	"Because groundwater is not currently used as a public drinking water source at the SGP and is assumed to be unlikely to be used as a drinking water source in the future, " This is inconsistent with statements in the same paragraph above this sentence. There is currently a drinking water supply well at the current camp, running through arsenic and antimony ion exchange resin columns. There will be groundwater wells associated with the worker housing facility to supply drinking water.
Public Health and Safety	417	4-524	4.18.2.2	1	PRII	"The IDEQ would further regulate groundwater quality standards under its IPDES permit " Inaccurate statement. Please replace " IPDES permit " with " POC program ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Public Health and Safety	418	4-524	4.18.2.2	3	PRII	"The SGP is not expected to exacerbate any of these existing hazards, but could increase the risk of damage, injury, or loss of life from the hazards due to the increased number of people traveling through the area to the SGP." The magnitude of risk is not increasing, but the frequency of something occurring. The project would actually reduce the risks to avalanches & landslides as a result of operational BMP's. The analysis should look at 2021 MMP wholistically and include the operational aspects that would actually reduce the hazard during operations over baseline conditions. Please revise this sentence, taking this information into consideration.
Public Health and Safety	419	4-524	4.18.2.2	7	PRII	"Conversely, the "boom and bust" related decrease in mine-closure related local employment and labor income also could have significant adverse effects on the local economy." Please provide a source for this information.
Recreation	420	3-442	3.19.4.3	2	PRII	"Recreation Setting " Please clearly state that this only applies to the National Forest and not the state/private lands within the analysis area.
Recreation	421	3-448	3.19.4.5	5	PRII	"Special Recreation Use Permits " This is not an indicator. Please remove.
Recreation	422	4-529	4.19.1	3 (bulleted list)	PRII	"Changes in recreation physical setting characteristics and related ROS class (by season) measured in acres ." Where are acres presented? Not in Chapter 3 or 4. Please provide.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	423	4-529	4.19.1	8	PRII	"Effects on the physical ROS in the analysis area focus on two impacts: (1) identified inconsistencies with the existing designated ROS classes due primarily to changes in where motorized use would be allowed, or increased development/landscape modification with implementation of the action alternative;" This infers an inconsistency with the LRMPs. Because the ROS is established in the LRMPs with areas mapped, along with standards and guidelines, modifications that don't fit in, such as those identified throughout this analysis are not consistent with the LRMP. A better explanation of how the ROS are still met is necessary along with a clear statement that Forest Plan standards would be met.
Recreation	424	4-531	4.19.2.1	2	PRII	"Under the No Action Alternative there would be minimal changes to the existing environment; therefore, no changes to the ROS classes and physical setting are anticipated ." Please provide a measurement of acres for ROS classes.
Recreation	425	4-532	4.19.2.2	4	PRII	"Given the closeness of the SGP to the FCRNRW boundary, portions of the FCRNRW would have unobstructed views of the SGP, including nighttime lighting, at superior viewing locations such as mountain tops or ridgelines ." Please clarify what portions of the FCRNRW are being referred to in this passage and reference the Scenic Resources analysis accordingly. There are no views from the FCRNRW that can see <i>directly into</i> the SGP...certainly there are no unobstructed views. The majority of the FCRNRW boundary (and thus the FCRNRW) is located on the opposite side of the ridge from the SGP.
Recreation	426	4-532	4.19.2.2	4	PRII	"Visual impacts for recreation would be negligible to minor, long-term, and regional ." Please define the assessment of regional impact.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	427	4-532	4.19.2.2	5	PRII	"Wildlife in the analysis area also would be affected by operational noise, traffic, and activities, likely resulting in displacement of wildlife away from the analysis area." Please relate this directly to recreation.
Recreation	428	4-534	4.19.2.2	4	PRII	"Fish adjacent to the Burntlog Route may be affected by increased sediment and could be affected if a spill were to occur (Section 4.12); therefore, there may be decreased recreational fishing success immediately along the Burntlog Route" Please provide information to support the claim of an increase in sediment, and please also note the measures that would be taken to reduce potential sedimentation, including replacing a native surface with a gravel surface, enhancing drainage to reduce erosion, and the application of dust suppressants. The same verbiage on potential impacts from sedimentations is presented in the description of the Johnson Creek Route on page 4-577 (paragraph 4). This equates potential impacts from sedimentation between the Burntlog Route and the Johnson Creek Route, which is inaccurate. It does not recognize the Burntlog Route's increased distance from adjacent waterways relative to the Johnson Creek Route.
Recreation	429	4-535	4.19.2.2	2	PRII	"The OSV trail on the west side of Johnson Creek from Wapiti Meadows to Trout Creek campground would be closed during construction (9 miles)." An OSV route doesn't currently exist along the west side of Johnson Creek Rd between Trout Cr and Wapiti. The existing OSV groomed trail is located within the existing JC roadbed. Please revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	430	4-535	4.19.2.2	2	PRII	"To replace the Warm Lake to Landmark OSV route that would be closed from construction through reclamation, there would be a groomed OSV trail from Cabin Creek, near the Knox Ranch parking area, to the Trout Creek campground (11 miles). OSV riders would then use the route on the west side of Johnson Creek to head south to Landmark." This description needs to include the segment south of Warm Lake Road connecting JC Rd to Landmark-Stanley Rd that is described in Table 2-3 of the specialist report.
Recreation	431	4-535	4.19.2.2	3	PRII	"Access would be restricted on roads and OSV routes during avalanche control . Avalanche control may make slopes in the area attractive to skiers and OSV riders due to the perception of lower risk." Perpetua is not proposing avalanche control along OSV routes. They are not currently controlled. Please delete from SDEIS.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	432	4-535	4.19.2.2	5	PRII	"Plowing of the approximately 38-mile Burntlog Route would result in the loss of 9.8 miles of infrequently groomed OSV route along the existing Burnt Log Road ." The description of OSV grooming in this paragraph is incorrect and there is no reference to where this information was sourced. I'm assuming it came from the Valley County Groomed Snowmobile Routes Website (https://experience.arcgis.com/experience/a92a825e3af44c4a94da9cf6460455e0/) I suggest the author reach out to the Valley Co Recreation Director for details. They have provided the following information to Perpetua Resources: Valley Co only grooms 4.0 miles of Burnt Log Rd to the Junction with USFS Rd 447E. They only groom approximately 600 ft of Sand Cr Rd (USFS Rd 437). Valley Co does not groom Horn Creek Rd (They quite grooming that as part of the "no net gain" policy. They do groom Sulphur Creek and Landmark-Stanley Rd (referenced as Warm Lake Rd east/south of Landmark). Additional mileage gained along the Cabin Cr Rd/JC Rd OSV would need to be offset by other OSV routes; namely those east of Landmark. Please verify.
Recreation	433	4-535	4.19.2.2	5	PRII	"Plowing of the Burntlog Route and Warm Lake Road would cutoff direct OSV access to the Horn Creek Road, Sand Creek Road, and Warm Lake Road (east/south of Landmark) OSV routes from Johnson Creek Road, which would be the only publicly available winter route to the Landmark area as Warm Lake Road would be closed to public winter use. " This naming convention is likely from the Valley County Groomed Snowmobile Routes website, but is incorrect. Other maps call this road USFS Rd 579, the Landmark-Stanley Rd. Please revise.

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A1: Other Resources

Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	434	4-535	4.19.2.2	5	PRII	"Plowing of the Burntlog Route and Warm Lake Road would cutoff direct OSV access to the Horn Creek Road, Sand Creek Road, and Warm Lake Road (east/south of Landmark) OSV routes from Johnson Creek Road, " Also "Lack of access to the Warm Lake Road OSV route south of Landmark also would affect access to the North Fork Sulphur Creek Road OSV route. " This OSV route would not cut off from the JC OSV Route. The 2021 MMP has a connector along the south side of Warm Lake Rd providing access to Landmark-Stanley Rd. Therefore, it is incorrect to say that Landmark-Stanley Rd would be "cut off from public winter use." Please revise.
Recreation	435	4-535	4.19.2.2	5	PRII	"Until the decommissioning of the Burntlog Route and reverting the remaining road back to a groomed OSV route, winter impacts to OSV use along the Burntlog Route would be major , long-term , and localized. " The proposed OSV route along Cabin Cr Rd/Johnson Cr Rd(west side), and the JC Rd/Landmark-Stanley Rd connector south of Warm Lake Rd was to maintain "in-kind" access for OSV users to the Landmark-Stanley Rd and beyond. Thus, we would suggest that the impacts are not major. Also, this analysis should acknowledge and describe the "no net gain" policy adopted by the Payette/Boise NF.
Recreation	436	4-537	4.19.2.2	1	PRII	"To continue providing OSV access to Landmark during Burntlog Route construction, a groomed OSV route would be created adjacent to the western side of Johnson Creek Road between the proposed Cabin Creek Road groomed OSV route and Landmark and maintained until construction activities are completed. " Please include the segment of OSV connecting JC Rd to Landmark-Stanley Rd in this description.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	437	4-537	4.19.2.2	3	PRII	"However, plowing and construction traffic on Johnson Creek Road and Warm Lake Road (described below) and the location of the temporary groomed OSV route along the western side of Johnson Creek Road may make it difficult and/or unsafe for OSV's to cross Johnson Creek Road or Warm Lake Road to reach other OSV routes in the Landmark area, resulting in reduced OSV opportunities and use." Please remove as this is a speculative assumption that is not provided with any supporting information. Valley County Recreation could be consulted to determine if their users consider this a safety hazard. The assumption that it would reduce OSV opportunities is not correct, and the assumption that it would reduce use is speculative. Please revise or remove.
Recreation	438	4-538	4.19.2.2	3	PRII	"During construction (prior to the completion of the Burntlog Route) access through the Operations Area Boundary would continue, but there may be half-day to multiple day road closures of Stibnite Road and Thunder Mountain Road." During construction, the through site public access road would take one year to complete. Following its completion, partial to multi-day closures may be required to ensure public health and safety. Please clarify this description to be consistent with other Sections of the SDEIS which accurately characterize the periods of restricted access through the site.
Recreation	439	4-542	4.19.2.2	5	PRII	"The upgraded transmission line would be wider and taller (by 30 feet) with an expanded ROW" While the ROW may be wider, the transmission line and structures would not be wider. Please delete "wider".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	440	4-546	4.19.2.2	3	PRII	"The upgraded transmission line from Lake Fork to Johnson Creek substation would be retained and used by IPCo. The associated facilities along the upgraded transmission line (i.e., switching station, substations) would remain in place and would not be decommissioned;" The Johnson Creek substation would be removed. Please revise.
Recreation	441	4-546	4.19.2.2	5	PRII	"The anticipated acres of disturbance within each ROS physical setting are also provided in the Recreation Specialist Report (Forest Service 2022m). " If it's an indicator, this info needs to be included and explained, or the indicator needs to be modified to match.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	442	4-553	4.19.2.2	3, 5 and 6	PRII	<p><i>"Construction and operation of the new transmission line to the Operations Area Boundary, road improvements along the Burntlog Route, closure of Stibnite and Thunder Mountain roads through the Operations Area Boundary , communication facilities, and Operations Area Boundary facilities would temporarily affect the ability of Elk Springs Outfitters to access approximately half of their operating area , provide IOGLB licensed activities, and may degrade recreation experiences for customers participating in guided activities near construction of these components due to construction and mine operations noise and activity, construction and mine traffic, new motorized use, and reduction of acreage for available recreation. "</i></p> <p>AND</p> <p><i>"Construction of road improvements along the Burntlog Route, closure of Stibnite and Thunder Mountain roads , and Operations Area Boundary facilities would affect the ability of the Idaho Wilderness Company to access approximately 25 percent of the southern portion of their operating area, provide IOGLB licensed activities, and may degrade recreation experiences for customers participating in guided activities near construction of these components due to construction and operations noise and activity, mine traffic, and reduction of acreage available for recreation . "</i></p> <p><i>"Construction and operation of all the 2021 MMP components would affect the Juniper Mountain Outfitters operating area either directly or indirectly, specifically the ability to access approximately 50 percent of their operating area , "</i></p> <p>Access through the site is provided via the construction of a new road. It is stated in other sections of the SDEIS, access through site could be temporarily affected from several hours to up to one year while the</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation	443	4-557	4.19.2.3	5	PRII	"Impacts during construction and operations from the plowing of Johnson Creek Road would be similar to those described for construction under the 2021 MMP; however, the groomed OSV route along the western side of Johnson Creek Road would run from Trout Creek campground to Landmark (approximately 8 miles) under the Johnson Creek Route Alternative, allowing continued use of the Ditch Creek Road groomed OSV route ." The Ditch Creek Road would no longer be accessible in this alternative. Ditch Creek Rd is north of Trout Cr Campground. There would be no OSV route between Trout Cr and Wapiti under this Alt from Construction through Closure. Please revise.
Recreation Specialist Report	444	7	2.3	Table 2-1	PRII	" OSV trail on west side of Johnson Creek from Wapiti Meadows to Trout Creek campground closed during construction (9 miles) ." This section of OSV trail (currently) is Johnson Creek Road itself, not a trail on the west side. Please correct.
Recreation Specialist Report	445	7	2.3	Table 2-1	PRII	"OSV trail from Warm Lake to Landmark closed during construction through operations (8.5 miles) ." Please replace " operations " with " reclamation and closure " to make this statement correct.
Recreation Specialist Report	446	10	2.4	Table 2-3	PRII	"During construction, approximately 13 miles of groomed OSV trail would be maintained along Cabin Creek Road (FR 467) ." Please reconcile this value with what is reported in chapter 4.19 (11 miles).
Recreation Specialist Report	447	48	7.2.2.1	5	PRII	"Therefore, beginning at construction, approximately 13,441 acres of NFS lands (and approximately 780 acres of private patented lands within the Operations Area Boundary) would be inaccessible to dispersed recreation (Figure 7-1a). " Please provide a source for this information.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	448	65	7.2.2.1	4	PRII	"Given the closeness of the SGP to the FCRNRW boundary, portions of the FCRNRW would have unobstructed views of the SGP, including nighttime lighting, at superior viewing locations such as mountain tops or ridgelines." Please qualify this statement with supporting information from the Scenic Resources analysis or remove.
Recreation Specialist Report	449	65	7.2.2.1	4	PRII	"Presumably, if the plume would be visible within the FCRNRW, it also would be visible from other nearby NFS lands outside the Operations Area Boundary, thus affecting the recreation setting for both wilderness and non-wilderness users." Please remove presumptive phrases from this analysis.
Recreation Specialist Report	450	67	7.2.2.1	1	PRII	"The Burntlog Route would generally be visible 2 to 3 miles east of the route, including some areas within the FCRNRW , and less than 1 mile west of the route and would introduce nighttime lighting to areas that currently do not have such lighting." Please support such ambiguous and unsupported statements with Scenic Resources analysis data or remove.
Recreation Specialist Report	451	67	7.2.2.1	4	PRII	"The 13.5 miles of Burntlog Route would increase the area with a semi-primitive motorized recreation setting." Please clarify the section of Burntlog Route that is being referred to here The BL Route is 38 miles long.
Recreation Specialist Report	452	67	7.2.2.1	5	PRII	"The Burntlog Route, including 20 miles of improved Burnt Log Road (FR 447) and 13.5 miles of new Burntlog Route roadway (Figure 7-3b), would be open to the public when other public access routes are closed." It's been established that it is 15 miles in other sections. Please revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	453	68	7.2.2.1	3	PRII	"Access would be restricted on roads and OSV routes during avalanche control . Avalanche control may make slopes in the area attractive to skiers and OSV riders due to the perception of lower risk. These paths could become more popular as ski zones if they are controlled. This could add an uncontrolled random factor into highway safety programs ." Please revise; Avalanche control of the OSV route is not in the MMP and no avalanche control occurs along OSV routes currently.
Recreation Specialist Report	454	68	7.2.2.1	5	PRII	"Plowing of the approximately 38-mile Burntlog Route, which includes the existing Burnt Log Road, would result in the loss of 9.8 miles of infrequently groomed OSV route along the existing Burnt Log Road. Horn Creek Road (FR 414) is a groomed OSV route for 4 miles and is accessed from Johnson Creek Road (CR 10-413) and Burnt Log Road (FR 447). " This is not accurate and does not consider the full context of OSV route adjustments and the Forest Service's "no net gain" policy. Please revise in accordance with other comments provided in this Section and Section 4.19.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	455	68/Global	7.2.2.1	5	PRII	<p>Warm Lake Road east and south of the junction with Johnson Creek Road is a groomed snowmobile route for several miles and provides access to the North Fork Sulphur Creek Road (FR 442) 3.2-mile groomed route. "</p> <p>AND</p> <p>"Plowing of the Burntlog Route and Warm Lake Road would cutoff direct OSV access to the Horn Creek Road, Sand Creek Road, and Warm Lake Road (east/south of Landmark) OSV routes from Johnson Creek Road (CR 10-413), which would be the only publicly available winter route to the Landmark area as Warm Lake Road would be closed to public winter use ."</p> <p>"Warm Lake Road" should be replaced with "Landmark-Stanley Rd". This description of OSV route management is not accurate and does not consider the full context of OSV route adjustments and the Forest Service's "no net gain" policy. Please revise in accordance with other comments provided in this Section and Section 4.19.</p>
Recreation Specialist Report	456	68	7.2.2.1	5	PRII	<p>"Direct OSV access to other OSV routes could be cutoff because any overland travel or OSV travel across or on the plowed Warm Lake Road and Burntlog Route would have to share the roadway with mine operation traffic also using this roadway. " This is incorrect. The ModPro2 proposed OSV traffic will merge for 150ft before using a dedicated OSV route to connect with Landmark-Stanley Rd. See Table 2-3 in this report, row 2. Changes to this sentence would require editing of the remainder of this paragraph.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	457	69	7.2.2.1	3	PRII	"Impacts to winter recreation opportunities, facilities, use, and access from use of the Burntlog Route during operations would focus on the Burntlog Route corridor and connecting OSV routes and would continue until the Burntlog Route was decommissioned (and therefore no longer plowed); Burnt Log Road (FR 447) returned to a groomed OSV route; and public access to Stibnite Road (CR 50-412) was reopened. The impacts would be long term, localized, and major ." Please clarify this statement. In doing so, it should be recognized that per the Payette Forest Plan, the concept of "no net gain" applies to OSV access. An increase in OSV access in one location must be offset by removing OSV access elsewhere. This would apply to the additional OSV mileage gained by using the 2021 MMP proposed OSV access route. OSV access east of Landmark (including Burnt Log Rd, Sand Creek, and Horn Creek) would likely be removed from the grooming schedule to offset the previously mentioned increase per the Forest Service's "no net gain" policy. Additional information on this topic is available by contacting the Valley County Recreation Director. We suggest that the "no net gain" concept is important and of interest to the reader; it should be included in descriptions of proposed changes in OSV access .
Recreation Specialist Report	458	70	7.2.2.1	4	PRII	"Ditch Creek Road (FR 410) is a groomed OSV route for 2 miles and is located off Johnson Creek Road (CR 10-413) just north of Trout Creek Campground ." Please replace " groomed " with " infrequently groomed " for accuracy.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	459	71	7.2.2.1	1	PRII	"Impacts to recreation access, opportunities, settings, experiences and use from mine construction traffic use of Warm Lake Road (CR 10-579) would be similar to those described above for the Johnson Creek Route (Johnson Creek and Stibnite Roads); however, Warm Lake Road (CR 10-579) would have a less substantial increase in traffic compared to Johnson Creek Road (CR 10-413) increasing by 11.9 percent from 1,670 to 1,868 AADT (Forest Service 2021b). " The increase of 198 AADT would be from SH55 to the SGLF only. From the SGLF to SGP the increase in AADT would be 65 during construction for a total of 1735 (3.9% increase) , see table 4.16-2 from Chapter 4.16. Please revise to reflect this.
Recreation Specialist Report	460	71	7.2.2.1	2	PRII	"From Trout Creek Campground, OSV users could continue down Johnson Creek Road (CR 10-413) to Landmark on a groomed OSV route. " Users would continue down a groomed OSV route parallel to Johnson Creek Road to Landmark , not on the road during construction. Please replace "Johnson Creek Road" with " a groomed OSV route parallel to Johnson Creek Road ".
Recreation Specialist Report	461	74	7.2.2.1	6	PRII	"The re-routed portion along the road would not be in a recreation area . " In paragraph 1, Page 76, it is stated that: " <i>In addition, the re-routed portion of the transmission line along the NFS and State lands around the Thunder Mountain Estates, would alter the recreation setting of these lands</i> ". These statements are conflicting. Please revise either statement to reflect which is accurate.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	462	76	7.2.2.1	1	PRII	"The upgraded transmission line would be wider and taller (by 30 feet) with an expanded ROW (average of 50 feet wide in relatively flat areas and 100 feet wide in mountainous and forested areas) " While the ROW may be wider, the transmission line and structures would not be wider. Please delete " wider ".
Recreation Specialist Report	463	78	7.2.2.1	3	PRII	"In addition, the 13.5 miles of new roadway would be recontoured; with culverts and bridges removed, and 6 inches of growth media placed on the roadway and seeded." The new roadway is 15 miles. Please replace " 13.5 " with " 15 "
Recreation Specialist Report	464	79	7.2.2.1	1	PRII	"Potential impacts to recreation from the reclamation activities are long term, localized, and moderate. " In the 5th paragraph on the previous page is the statement " <i>Impacts from reclamation are anticipated to return to the baseline conditions .</i> " Please edit the statement on this page to reflect the previous statement that " impacts are anticipated to return to baseline conditions ".
Recreation Specialist Report	465	80	7.2.2.1	2	PRII	"The new transmission line, transmission line access roads, and metering station at the SGP would be decommissioned. " Please add that the Johnson Creek Substation will be removed.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	466	91	7.2.2.4	4	PRII	<p>"The 2021 MMP components that would affect the Idaho Wilderness Company operating area during construction include Burntlog Route (Thunder Mountain Road improvements), closure of Stibnite and Thunder Mountain roads through the SGP, and SGP facilities. Construction of these components would affect the ability of the Idaho Wilderness Company to access approximately 25 percent of the southern portion of their operating area , "</p> <p>AND</p> <p>"Construction of the 2021 MMP components would affect the ability of Juniper Mountain Outfitters to access approximately 50 percent of their operating area ; "</p> <p>Access through the site is being provided via the construction of a new road. Please revise the statements regarding the loss of access by outfitters and the loss of access through the site.</p>
Recreation Specialist Report	467	100	7.2.3.1	4	PRII	<p>"Impacts would persist throughout the 2- to 3-year mine construction period and are anticipated to be short term, localized and moderate ." Johnson Creek Alternative construction would be 5 years. Please replace "2- to 3-year" with "5-year"</p>
Recreation Specialist Report	468	101	7.2.3.1	3	PRII	<p>"However, the groomed OSV route along the western side of Johnson Creek Road would run from Trout Creek campground to Landmark (approximately 8 miles) under the Johnson Creek Route Alternative (Figures 7-11), allowing continued use of the Ditch Creek Road (FR 410) groomed OSV route ." Under the JC alt, access to Ditch Creek Rd during winter would be inaccessible. In fact, OSV access between Trout Cr Campground and Wapiti would be inaccessible from construction through closure. Ditch Creek is north of Trout Cr. Please revise.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	469	129	7.5.2	1	PRII	"In terms of facilities, the only recreation facility that would be closed until SGP access was reclaimed would be the Stibnite Mining District Interpretive Site ." Under the JC alt, OSV access from Trout Creek north to Wapiti would be inaccessible. Please revise.
Recreation Specialist Report	470	129	7.5.2	1	PRII	"This would represent an irretrievable commitment of this resource ." Access would be re-established during closure.
Recreation Specialist Report	471	130	7.6	3	PRII	"The Burntlog Route may have an increased impact on the ability of the two permitted outfitters to provide permitted activities due to the impacts on wilderness activities. " Please specify the impacts on wilderness activities.
Recreation Specialist Report	472	130	7.6	5	PRII	"In addition, under the Johnson Creek Route Alternative, the Johnson Creek OSV route would be longer (up to Wapiti Meadow Ranch) . " This OSV route would be not extend up to Wapiti. Please correct.
Recreation Specialist Report	473	131	7.6	021 MMP colu	PRII	"Access to the areas/facilities accessed from Thunder Mountain Road (FR 50375) east of the SGP would be modified due to closure of Stibnite Road (CR 50-412) and creation of the Burntlog Route, which would provide motorized access (year-round) to areas that currently do not have motorized access. " Please revise. This passage appears to ignore the fact that through site access on Stibnite Road is being replaced, not closed. Also please reconcile the description of unrestricted Burntlog Route access with other sections of the SDEIS which describe this as alternative access.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Recreation Specialist Report	474	132	7.6	021 MMP colu	PRII	"These components include the mine and facilities at the SGP, Burntlog Route, upgraded transmission lines, new transmission line to the SGP, Johnson Creek substation, cell tower on Meadow Creek Lookout Road , use of Warm Lake Road, and temporary use of the Johnson Creek Route. " Cell tower isn't located on MC LO Rd. It's located next to the transmission line north of Hangar Flats Pit.
Recreation Specialist Report	475	133	7.6	021 MMP colu	PRII	"Impacts to outfitters and guides from the closure of Stibnite Road (CR 50-412) would not occur. " Stibnite Road would be replaced in the Johnson Creek Route Alternative. Please replace " closure " with " replacement ". For both alternatives, through site access on Stibnite Road is being replaced, not closed.
Scenic Resources	476	3-449	3.20.2	5	PRII	"The analysis area for scenic resources is not a definitive boundary as it includes all areas where the SGP would potentially be visible to the public. " Please replace " where the SGP " with " where SGP components "
Scenic Resources	477	3-449	3.20.2	5	PRII	"The analysis area generally extends north of and along the East Fork Road segment and the Stibnite Road segment of the McCall-Stibnite Road (CR 50-412), to the east into portions of the FCRNRW, south of and along Warm Lake Road (CR 10-579), and west of Lake Cascade, and represents a 25-mile viewshed analysis area (Figure 3.20-1) ." There is not a definitive 25-mile viewshed analysis area on Figure 3.20-1. Please clarify if this is 25 miles from the mine site or 25 miles from any mine feature, or a 25-mile area that encompasses all SGP components.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	478	4-568	4.20.2.2	2	PRII	"Additionally, air quality modeling predicts visual impacts from the potential emissions plume. Actual visibility would depend on meteorological conditions. Visibility and associated impacts would lessen the greater the distance from the Operations Area Boundary and visual contrast would appear strongest during times of low sun angle. Section 4.3 and the SGP Air Quality Specialist Report provide additional information regarding the emissions plume (Forest Service 2022a)." - Suggest clarifying for the reader that potential plume blight due to mine site emissions is described in Section 4.3.4.2 of Section 4.3 and impacts are concisely summarized in Tables 4.3-16 and 4.3-17.
Scenic Resources	479	4-569	4.20.2.2	2	PRII	"The Hangar Flats pit would be completely backfilled, resulting in a line and form that would blend with the surrounding natural topography." - It should be noted here that the pit is below the current valley floor and a high wall on the steep slope to the north cannot be backfilled and would remain exposed. Suggest revising to reflect the current plan.
Scenic Resources	480	4-569	4.20.2.2	2	PRII	"Meandering stream channels would be designed across the TSF and TSF Buttress. Reclamation and revegetation of SGP features would contribute collectively to reduce permanent visual contrast to the characteristic landscape." True for the TSF but not true for the TSF Buttress. Please revise to reflect the current plan.
Scenic Resources	481	4-569	4.20.2.2	3	PRII	"Visual impacts from construction would alter the experience for individuals at the lookout by transforming it to a more industrial setting." Please define " industrial " or choose another term as construction at the site would likely create an industrial setting, but not construction on the Burntlog Route, for example.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	482	4-569	4.20.2.2	5	PRII	"Nighttime lighting would be perceptible during construction and operation, although implementation of Forest Service mitigation measures specific to lighting would reduce the magnitude of impacts from sky glow. Permanent contrast would be slightly reduced over time because color contrasts of the TSF and the backfilled Hangar Flats pit would gradually diminish through reclamation and revegetation. For areas where revegetation is not possible, in geologic time (i.e., millions of years), weathering would reduce the contrast but, in any human-type context, the change would be permanent because of the coloration and angular nature of the granitic rock against more surficial sedimentary type rocks. " The discussion of FS mitigation measures overlooks the design features that Perpetua has also incorporated into the project. This paragraph discusses nighttime impacts and then switches to color and contrast which would not be visible at night. Please separate discussion of elements of visual impacts that are at night vs. day.
Scenic Resources	483	4-570	4.20.2.2	3	PRII	"Short-term impacts visible from KOP 4 would be similar to those described above and would be seen from a superior vantage point ." Vantage point would be level or inferior from KOP 4. Please revise.
Scenic Resources	484	4-570	4.20.2.2	4	PRII	"The emissions plume would be visible from KOP 4. " Presenting as "the emissions plume" suggests to the reader it is a persistent feature, which it is not. Please clarify this statement with additional information from Section 4.3.4.2 and Tables 4.3-16 and 4.3-17.

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Scenic Resources	485	4-571	4.20.2.2	1	PRII	"The limestone crushing plant could be visible from KOP 4 in the middleground once vegetation present in the foreground is cleared." Please clarify how this assertion is made with an appropriate reference to the Specialist Report. It seems highly unlikely that the LS crushing plant would be visible from KOP 4.
Scenic Resources	486	4-571	4.20.2.2	4	PRII	"The 2021 MMP components described in the list above would result in very similar visual changes to the characteristic landscape as viewed from KOP 4." Please list the components. It is unlikely that MMP components would be the same at KOP4 as they would for KOPs 1, 2, 9, 10, or 12.
Scenic Resources	487	4-571	4.20.2.2	4	PRII	"Visibility would generally extend up to 2 to 3 miles to the east of the Burntlog Route and less than 1 mile to the west." Please clarify where this visibility of the BL Route would be from.
Scenic Resources	488	4-571	4.20.2.2	4	PRII	"The route also could be visible from a ridgeline about 5 to 7 miles west , although due to distance, visual contrast would be weak." Please clarify where the location is that the route would be visible from.
Scenic Resources	489	4-572	4.20.2.2	1	PRII	"Construction activity on the Riordan Creek segment of the Burntlog Route and the Stibnite Road (CR 50- 412) to Thunder Mountain Road (FR 502375) link would have the same type of impacts to the landscape." Please state why this is the case only for these segments. This should describe the entire BL Route since the existing segments will be widened too.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	490	4-572	4.20.2.2	2	PRII	" During operations , long-term visual effects associated with improvements to Burnt Log Road (FR 447) would occur from Landmark to Trapper Flat, which would require grading and removal of vegetation to accommodate a travel width of 20 feet and total width of up to 26 feet (but less in some locations), including shoulders. " This would be during construction. Please replace " During operations " with " During construction "
Scenic Resources	491	4-572	4.20.2.2	2	PRII	"Similar to the existing portion of Burnt Log Road (FR 447), upgrades required along the portion of Thunder Mountain Road (FR 50375) between the worker housing facility and the mine entrance gate would require upgrades to existing access, including grading, vegetation removal, and upgrade of road structures ." Please add " and road widening " after " road structures " for accuracy.
Scenic Resources	492	4-572	4.20.2.2	4	PRII	"The Riordan Creek segment of Burntlog Route and the Stibnite Road (CR 50-412) to Thunder Mountain Road (FR 50375) link " Please include " the entire segment between the end of Burnt Log Rd and MC LO Rd " and " the segment from MC LO Rd to Thunder Mtn Rd " in this statement for accuracy.
Scenic Resources	493	4-572	4.20.2.2	5	PRII	" A 140-foot-tall road cut near the SGP would introduce a large, smooth light-colored surface above the road that would sharply contrast with the natural, variable lines and forms of the surrounding landscape. " Please state exactly where this is located.
Scenic Resources	494	4-574	4.20.2.2	3	PRII	"From KOP 4, the Stibnite Road (CR 50-412) to Thunder Mountain Road (FR 50375) link would travel north through the SGP " Incorrect, please replace " north " with " south ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	495	4-575	4.20.2.2	3	PRII	"The impacts visible from KOP 10 would alter the experience of individuals traveling on the forest road by transforming the surrounding setting to a more industrial-like landscape ." Based on the simulation, this is not accurate. Please revise to exclude the "industrial-like landscape"
Scenic Resources	496	4-577	4.20.2.2	2	PRII	"The viewshed analysis (Appendix C of the Scenic Resources Specialist Report [Forest Service 2022n]) indicates that utilities would be visible from 12 KOPs, where detailed analyses were performed: KOP 1, 2, 3, 5, 6, 7, 8, 9, 14, 15, 16, and 17 (Figure 3.20-1). " The transmission would likely not be visible from KOPs 2 and 9, as described in the following sections for each KOP. Please remove KOP 2 and 9 from this list.
Scenic Resources	497	4-577	4.20.2.2	2	PRII	"Communications towers are not expected to be visible from the KOPs ." The cell tower would be visible from KOP1. Please revise.
Scenic Resources	498	4-577	4.20.2.2	3	PRII	"Construction-related changes to the landscape would not be visible from the Thunder Mountain Estates subdivision ." Actually, a new segment of the transmission line will be constructed north of Thunder Mtn Estates but the existing line goes right through the subdivision. We intend to remove it once the new segment is constructed. Please revise this sentence to read "Construction-related changes to the landscape that would be visible from the Thunder Mountain Estates subdivision include the removal of the existing transmission line that runs through the subdivision following the construction of the new segment of transmission line ."

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	499	4-577	4.20.2.2	4	PRII	"The level of visual change would be moderate to high where tree clearing would occur in densely wooded areas with steep terrain due to grading or exposing lighter-colored rock. " With only 15 additional feet on either side of the ROW, the level of change would be minor to moderate. Please replace " moderate to high " with " minor to moderate ".
Scenic Resources	500	4-577	4.20.2.2	4	PRII	"Access for construction and maintenance of the transmission line would occur in the existing ROW , including conductor-stringing vehicles, construction trucks, and equipment. " This is true in some locations, but many access roads originate from outside the ROW. Please revise.
Scenic Resources	501	4-580	4.20.2.2	2	PRII	"Visual changes associated with widening the ROW would reinforce the existing linear form of the ROW edge, resulting in a bolder, geometric, man-made element in this rugged natural landscape. " This would be 100 ft wide area of new ROW. Please replace " widening of the ROW " with " construction of the 100 ft wide ROW ".
Scenic Resources	502	4-580 (also Global)	4.20.2.2	4	PRII	"Long-term visual contrast would result from ROW grading , vegetation removal, and introduction of new transmission line structures. " The ROW wouldn't be graded. Only structure pads and potentially localized access road improvements within the ROW would. Please remove all references to "ROW grading" and replace " ROW grading " with " ROW clearing ".
Scenic Resources	503	4-582	4.20.2.2	2	PRII	"KOP 9: Frank Church-River of No Return Wilderness – Pistol Lake " Please keep the naming of KOPs the same between Chapter 3 and Chapter 4. Replace this heading with " KOP 9: Boundary of the Frank Church-River of No Return Wilderness Near Pistol Lake "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	504	4-582	4.20.2.2	2	PRII	"Viewshed modeling indicates that short-term visual contrast from this viewpoint could result from construction activities for the transmission line upgrade. However, due to distance and intervening terrain, visual contrast would be weak to none. Existing vegetation also would limit visibility as long as it is present. " Please add that the transmission line would not be visible from Pistol Lake.
Scenic Resources	505	4-583	4.20.2.2	3	PRII	"The perimeter of the substation would be fenced, and nighttime lighting would be required for maintenance activities, introducing sky glow that would impact the integrity of the night sky . Impacts to night sky would be reduced by implementation of design features such as using minimal lighting, directing lights downward, and shielding lights where appropriate. " No maintenance activities would occur at night. No lights are planned. Please delete.
Scenic Resources	506	4-585	4.20.2.2	2	PRII	"The SGLF is not within the PNF or BNF, and, therefore, there is no VQO associated with the facility. After reclamation activities have concluded at the SGP, the maintenance facility would be decommissioned and reclaimed to existing conditions. Over time, color contrast would be reduced to a low level of visual contrast once native vegetation becomes established. Permanent visual contrast would be low, and nighttime lighting would return to existing conditions, resulting in negligible permanent visual contrast. " This needs to be a separate paragraph as this is describing a different facility than the first half of the paragraph.
Scenic Resources	507	4-585	4.20.2.2	3	PRII	"The 25-acre site footprint would extend along Warm Lake Road (CR 10-579) in flat to slightly rolling terrain with low-lying vegetation . " The site is dominated by lodgepole pine. Please replace " low-lying vegetation " with " lodgepole pine ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	508	4-585	4.20.2.2	4	PRII	"Slight modifications to landform may be evident, and vegetation would be cleared in the majority of the site footprint ." The Conditional Use Permit stipulates a 50-foot setback from the property. That 50-foot setback is dominated by lodgepole pine which acts as a screen. In addition, between the Warm Lake Road borrow ditch and the property line there is an additional 50 feet of lodgepole for a total of 100 feet of lodgepole screen. Please replace " in the majority of the site footprint " with " within the footprint, outside of the 50 ft setback, which provides visual screening. "
Scenic Resources	509	4-585	4.20.2.2	4	PRII	"A 199-foot communications tower would be constructed at or near the facility to provide telephone, internet, and radio communications. " This is a relic of the PRO. It was not carried forward as part of ModPRO2 (2021 MMP). Please delete.
Scenic Resources	510	4-585	4.20.2.2	5	PRII	"Additional nighttime lighting would be introduced at this facility, which would contribute to sky glow in an area where existing nighttime lighting is minimal; limited to the few residences in Scott Valley. " Per the CUP, Perpetua will be following Valley Co guidelines for protecting night skies. Specifically, Condition of Approval #5, "All lights shall be fully shielded so that there is not upward or horizontal projection of lights. The lights can only be a maximum of 20' in height and 3000 Kelvin." Please include this information in this paragraph.

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Scenic Resources	511	4-585	4.20.2.2	6	PRII	"After closure of the mine, the SGLF would not be reclaimed and it would be made available for other light industrial uses." This is possible. However, the CUP, Condition of Approval #18, "After reclamation of the mine site and the facility is no longer needed by Midas as a logistics facility, a new conditional use permit will be required prior to use by any other entity. If there is no further use of the site after a two-year time frame, the structures will be removed and the site reclaimed." Please revise to incorporate this information.
Scenic Resources	512	4-587	4.20.2.3	5	PRII	"Major road widening and/or straightening of curves, with associated cut and fill, would be required for the Johnson Creek Road (CR 10-413) portion of the Johnson Creek Route." Please replace " Johnson Creek Road (CR 10-413) " with " Stibnite Road (CR 50-412) " for accuracy.
Scenic Resources	513	4-588	4.20.2.3	4	PRII	"Johnson Creek Road (CR 10-413) would be plowed for year-round use under the Johnson Creek Route Alternative, and vegetation clearance along the road would increase in order to accommodate heavy vehicle mine traffic." Please delete " heavy " as this is not an accurate description of the mine traffic expected in this area.
Scenic Resources	514	4-589	4.20.2.3	2	PRII	"However, helicopters would be used during construction of communication repeater sites and would periodically enter into view from the majority of the KOPs during construction and maintenance activities." This paragraph, and section, needs an introduction. Please add " Under the Johnson Creek Route Alternative, the proposed new and upgraded transmission lines would be the same as those described under the 2021 MMP. " to the beginning of this paragraph (from Specialist Report)

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Scenic Resources	515	4-590	4.20.4.2	7	PRII	"4.20.4.2 A ction Alternatives " This section describes mine impacts which are not different between alternatives. Please add information about how the 2 action alternatives are different.
Scenic Resources Specialist Report	516	51	7.4.1	5 (bulleted list)	PRII	" B urntlog Route Geophysical Investigation Field Work (2020-2021) " This field work has not been conducted yet. Please remove dates.
Scenic Resources Specialist Report	517	54	Table 7-2	3	PRII	" B urntlog Route Geophysical Investigation E /BNF SOPA M inerals and geology; The purpose of the investigation is to collect crucial geophysical data along the existing Burnt Log Road and proposed new alignment between Trapper Creek and Stibnite. I In Progress: Scoping Start: 02/10/2020 Expected Decision: 03/2022 Expected Implementation: 09/2022 " Please revise schedule. This field work has not been conducted yet.
Scenic Resources Specialist Report	518	55	7.4.3	4	PRII	"There would be no new major utility corridors introduced through infrastructure development projects. " Please consider revising to account for the new 8.5 mile section of electric transmission line, unless that is not considered to be applicable for this sentence.
Social and Economic Conditions	519	3-459	3.21.2	1	PRII	"The direct and indirect effects analysis area for social and economic conditions consists of Valley County and Adams County (and associated communities) " Please include a statement that there are no reservations located directly within the analysis area.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Social and Economic Conditions	520	3-462	3.21.4.2	7	PRII	"Census data on housing prices in Valley and Adams counties do not show an increase in sale price resulting from a relatively low availability of housing, as median owner-occupied housing prices for both counties have fluctuated but generally not risen since 2010 (Census 2010, 2018; Highland Economics 2018) " Please add information regarding more recent home values. Suggested verbiage might include, "Real estate data for Valley County and (2020 to 2021) indicate that home prices have continued to climb. The median home price over 12 months for 2020 was \$480,000. In 2021, it jumped to \$675,000, a 41% increase." (https://boisedev.com/news/2022/01/31/valley-co-mls/) This trend of increasing prices in rural areas is important context for the reader, particularly with respect to the undefined and unsubstantiated "boom/bust" cycle that is mentioned several times in this document.
Social and Economic Conditions	521	3-463	3.21.4.3	4	PRII	"No employment growth from other new major mine operations in the region's mining and manufacturing sector over the 10-year period was forecasted (Idaho Department of Labor 2019). " Please replace " growth " with " impacts "
Social and Economic Conditions	522	3-467	3.21.4.6	4	PRII	"Utilities and communications are readily available to Valley and Adams counties residents. Idaho Power Company provides electric service to the region. Natural gas is not available in the area; therefore, homes are heated with electricity, propane, fuel oil, wood, and/or pellets. " Please add how internet is provided to these areas.
Social and Economic Conditions	523	4-592	4.21.1	3 (bulleted list)	PRII	Please reconcile topics mentioned here with those introduced in Table 1.10-1 and included in Chapter 3. Also, if items here are not mentioned in Table 1.10-1 or Chapter 3, they should not be included here.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Social and Economic Conditions	524	4-593	4.21.2.1	5	PRII	" Any impacts on recreation, infrastructure development, revenues, population, housing, and transportation impacts would be temporary and short term and no long-term changes to socioeconomic resources would occur (Forest Service 2015c)." Please clarify the impacts referenced here.
Social and Economic Conditions	525	4-595	4.21.2.3	5	PRII	"This local area employment increase would be expected to last for the duration of the mine operations phase; however, the post-closure decrease in employment and other related economic activity could result in adverse economic impacts on the local area's economy from the "bust" following the prior "boom" from the SGP's construction and operations employment and spending. " Please define this terminology and the expectation of this effect based on similar conditions in other mining operations/towns. Also, it is recommended that additional information be provided regarding more recent home values. Please note that "Real estate data for Valley County and (2020 to 2021) indicate that home prices have continued to climb. The median home price over 12 months for 2020 was \$480,000. In 2021, it jumped to \$675,000, a 41% increase." (https://boisedev.com/news/2022/01/31/valley-co-mls/) This trend of increasing prices in rural areas is important context for the reader, particularly with respect to the undefined and unsubstantiated "boom/bust" cycle that is mentioned several times in this document.
Social and Economic Conditions	526	4-595	4.21.2.3	5	PRII	"When mine operations cease, local communities and economies may experience a contraction in demand for private and public goods and services and a corresponding reduction in demand for labor." The effect on the demand is 1.6%. This will not create a large impact. Please include the 1.6% number as this gives context to this statement.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Social and Economic Conditions	527	4-595	4.21.2.4	6	PRII	"Indirect and Induced Employment: Increased sales for local suppliers providing construction materials and equipment represent an indirect effect of SGP activity and spending. Induced effects represent increased economic activity from household spending of labor income by both the SGP and supporting businesses' workers. " We suggest that this section should address the indirect impact ON employment, instead of just impacts from employment. Please revise.
Social and Economic Conditions	528	4-596	4.21.2.4	5	PRII	"It is important to note that these are jobs and income supported by the SGP, but at the national level, these are not necessarily additional jobs and income in the U.S. " This statement is outside the analysis area and irrelevant. Please delete.
Social and Economic Conditions	529	4-596	4.21.2.4	5	PRII	"If the capital and labor resources used for SGP's development were instead invested in mining or other economic activities elsewhere within the U.S., there would be employment and income benefits generated from these alternative activities (Highland Economics 2018)." This is an irrelevant statement. Please delete.
Social and Economic Conditions	530	4-596	4.21.2.4	6	PRII	"The indirect and induced job projections are based on national data on the relationship between employment and output for each affected economic sector. Depending on the specific state and local economic conditions, businesses operating at under capacity or facing limited increased demand may increase their utilization of their existing employees rather than hire new workers. " Redundant of second paragraph on this page. Please delete.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Social and Economic Conditions	531	4-597	4.21.2.4	2	PRII	"The total local, state, and national indirect and induced full and part-time jobs supported by the SGP would be approximately 170 (Highland Economics 2018)." Please indicate in this statement that the 170 direct and induce jobs applies to closure and reclamation. Please add a table that summarizes the indirect and induced jobs per phase.
Social and Economic Conditions	532	4-597	4.21.2.5	Entire section	PRII	Please add a graph that illustrates the mine phases and employment numbers, including baseline (2019 employment).
Social and Economic Conditions	533	4-597	4.21.2.5	7	PRII	"Therefore, the SGP could provide jobs to unemployed or under-employed residents in the labor force in those counties." Please revise to read "Therefore, if skills align , the SGP could provide jobs to unemployed or under-employed residents in the labor force in those counties."
Social and Economic Conditions	534	4-598	4.21.2.5	1	PRII	"Such potential "boom and bust" effects from a mine's closure are commonly recognized as potential source of adverse socioeconomic impacts on the local area economy." As noted previously, please provide a relevant example reference/citation for this statement. Also, Valley County could reasonably be described as undergoing a current "boom", with home prices rising dramatically in just the last 2 years. Please provide additional justification for the use of this term.
Social and Economic Conditions	535	4-599	4.21.2.6	3	PRII	"SGP employees and contractors would be expected to spend almost all their earnings in their community of residence , given their bi-weekly shift schedules and employee housing at the Operations Area Boundary's remote location." It is erroneous to suggest that up to 100% of their earnings will be spent. Please replace " spend almost all their earnings " with " spend a proportion of their earnings "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Social and Economic Conditions	536	4-600	4.21.2.6	Table 4.21-3	PRII	These numbers do not include taxes. Please state this.
Social and Economic Conditions	537	4-605	4.21.2.8	Table 4.21-5	PRII	"Direct 90/20 Indirect and Induced 40/10 Total – Reclamation/Closure 130/30 " Please add a footnote indicating what these numbers represent in this table
Social and Economic Conditions	538	4-606	4.21.2.10	5	PRII	"An influx of new SGP employees and contractors into the local communities would increase local housing demand. " Section 4.21.2.8 says that in-migration could be limited, which contrasts with this statement about an influx of employees and contractors. Please revise either or both sections to be consistent.
Social and Economic Conditions	539	4-614	4.21.2.12	1	PRII	"The Nez Perce Tribe's Department of Fisheries Resources Management (DRFM) operates Fisheries Restoration Programs in the vicinity of the proposed Operations Area Boundary such as the Johnson Creek Artificial Propagation Enhancement Project and its associated research program. Annual funding for the project and research is approximately \$1.5 million from a total annual operating budget of \$22 million and utilizes DRFM's staff labor from the total group of 200 employees (Nez Perce Tribe 2019). The project produces up to 110,000 Chinook salmon smolts annually for direct release into Johnson Creek while the research program examines smolt-to-adult return rates and the utilization of hatchery rearing of wild fish to supplement fish populations. " This information could be moved to Section 3.21 as it is affected environment information.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Social and Economic Conditions	540	4-613	4.21.2.12	2	PRII	"Project impacts regarding water quality and the transport of hazardous materials have the potential to affect the restoration efforts " Please specify what the actual effect on the restoration efforts would be.
Social and Economic Conditions	541	4-613	4.21.2.12	2	PRII	"However, the socioeconomic components for the restoration program (e.g., road access, employment) would observe negligible and short-term effects from the increased use of an existing roadway. " Please specify what the effects would be.
Social and Economic Conditions Specialist Report	542	10	4.2	5 (bulleted list)	PRII	" Impacts to housing demand and affordability in Valley and Adams counties. " All of the other items on this list are described using neutral terms. Please replace " Impacts to " with " Changes in "
Social and Economic Conditions Specialist Report	543	25	6.6.3	2	PRII	"Utilities and communications are readily available to Valley and Adams counties residents. Idaho Power Company provides electric service to the region. Natural gas is not available in the area; therefore, homes are heated with electricity, propane, fuel oil, wood, and/or pellets. " Please add how residents access the internet.
Special Designations	544	3-477	3.23.2	5	PRII	Figure 3.23-2 This figure should include the analysis area on it for WSRs. Please revise.
Special Designations	545	3-477	3.23.2	7	PRII	Figure 3.23-4 Please indicate what the solid gold coloring is adjacent to the RCAs on this figure. This figure should contain the analysis area on it to confirm both RNAs fall within it. Please revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Special Designations	546	3-485	3.23.4.1	3	PRII	"The existing conditions of wilderness within the analysis area relative to the five qualities of wilderness identified in the Wilderness Act (untrammelled, natural, undeveloped, opportunities for solitude or primitive and unconfined recreation, and other features of value) are summarized " If these qualities are quantifiable please include them in the following sections, (i.e. how many acres of these qualities exist within the SGP analysis area for this resource).
Special Designations	547	3-487	3.23.4.2	5	PRII	"This river segment is in BNF MA 19 Warm Lake and is estimated at 27.5 miles. " For this river segment and all others identified in this section please quantify how many miles of described segment fall within the SGP analysis area for this resource.
Special Designations	548	3-490	3.23.4.3	3 (bulleted list)	PRII	"4.2 – Roaded Recreation Emphasis5.1 – Restoration and Maintenance Emphasis within Forested Landscapes " This bullet does not sync with table 3.23-2 below. Should MPC 5.1 in the table be MPC 4.2 or visa versa? Please edit table or list for consistency.
Special Designations	549	3-490	3.23.4.3	5	PRII	"Table 3.23-3 lists the MPCs for the approximately 9,361 acres of lands in the analysis area that are contiguous to unroaded areas administered by the BNF or the Salmon-Challis National Forest shown on Figure 6-4 of the SGP Special Designations Specialist Report (Forest Service 2022p). " This acreage is not easily discernable in Table 3.23-3. If it is a combination of management areas, please explain.
Special Designations	550	3-492	3.23.4.3	Table 3.23-5	PRII	Please add a column to this table to indicate what portion of this part of the IRA falls within the SGP analysis area.
Special Designations	551	3-494	3.23.4.3	Table 3.23-6	PRII	Please add a column to this table to indicate what portion of this part of the IRA falls within the SGP analysis area.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Special Designations	552	4-623	4.23.1	5	PRII	<p>"WSR Indicators:</p> <ul style="list-style-type: none"> •Free-flowing conditions for eligible and suitable WSR segments; •Water quality for eligible and suitable WSR segments; •ORVs for which eligible and suitable WSR segments are designated or nominated; •Potential changes to classification of eligible and suitable WSR segments as Wild, Scenic, or Recreational. " <p>Please revise this list to be the same as Table 1.10-1, as shown below.</p> <p>WSR Indicators:</p> <ul style="list-style-type: none"> •Changes to free-flowing conditions for eligible and suitable WSR segments; •Changes in water quality for eligible and suitable WSR segments; •Changes to ORVs for which eligible and suitable WSR segments are designated or nominated; •Changes to classification of eligible and suitable WSR segments as Wild, Scenic, or Recreational.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests	553	3-498	3.24.2	2	PRII	"The analysis area for tribal rights and interests is the geographic area within which the SGP may directly or indirectly impact tribal real property interests or cause alterations in the character of tribal resources and in a tribe's ability to exercise their rights for off-reservation tribal hunting, gathering, and pasturing activities, fishing in usual and accustomed places, access streams and fountains, and their ability to practice spiritual and religious activities that also are protected under federal laws (Figure 3.24-1)." The analysis area does not include the reservations. Since reservations are discussed in the EJ section, it would be helpful to explain the locations of the reservations in relation to the analysis area.
Tribal Rights and Interests	554	3-500	3.24.3	9	PRII	"The Fort Bridger Treaty of 1868 (also known as the Shoshone Bannock Treaty) was the last reservation established through treaty council (Wikipedia 2022)." Please replace " Wikipedia 2022 " with the tribe's website - http://www.sbtribes.com/fort-bridger-treaty/
Tribal Rights and Interests	555	3-501	3.24.3	5	PRII	"After 1868, reservations were established through presidential executive order (Wikipedia 2022)." Please replace " Wikipedia 2022 " with the tribe's website - https://www.shopaitribes.org/spculture/
Tribal Rights and Interests	556	3-506	3.24.4.1	3	PRII	"The SGP is outside of the boundaries of the reservations recognized in either the Treaty of 1855 or the Treaty of 1863 reservations but is within the Nez Perce Tribe's traditional use area and ceded lands." Please include information about how far the boundaries of reservations are outside of SGP since the reservations are discussed in EJ.
Tribal Rights and Interests	557	4-664	4.24.1	3 (bulleted list)	PRII	Indicators: Chapter 1 includes more indicators which are not addressed here. Those indicators need to be addressed here also.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests	558	4-666	4.24.2.1	2	PRII	"Currently, there are ongoing releases of hazardous substances, pollutants, and contaminants to surface water and groundwater at the mine site including elevated concentrations of antimony, arsenic, copper, lead, mercury, and cyanide ." This is not correct. There is currently no elevated copper or lead concentrations in the project area and cyanide is questionable. This statement should reflect the facts as water sampling shows. Please revise this statement with respect to Ch3.8 & 4.8.
Tribal Rights and Interests	559	4-667	4.24.2.2	3	PRII	"There is one known pre-contact archaeological site identified as the Stibnite Lithics Site, within the Operations Area Boundary that would be avoided through protective measures (i.e., fencing) ; " This statement is inconsistent with Ch4.17, which describes avoidance not fencing. Please remove " fencing ".
Tribal Rights and Interests	560	4-667	4.24.2.2	3	PRII	"Currently, there are no known sacred sites within the Operations Area Boundary, however tribal consultation and the preparation of the confidential tribal ethnographies have identified a TCP District within the analysis area. " Please define TCP District.
Tribal Rights and Interests	561	4-667	4.24.2.2	5	PRII	" The Stibnite and Thunder Mountain roads through the SGP would be closed during the mine operations, potentially restricting access to important tribal resources and sites. " This is not correct. The MMP would replace through site access and provide non-winter access that is comparable to current conditions. Please revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests	562	4-668	4.24.2.2	4	PRII	"Public and tribal member use would generally not be allowed in the mine site footprint, areas adjacent to the mine site (i.e., the Operations Area Boundary), the upgraded transmission line ROW, and the new transmission line ROW from Johnson Creek Substation to the mine site. Approximately 13,441 acres of public lands within the Operations Area Boundary (14,221 acres) would become inaccessible to the Tribes once construction begins and would continue through closure and reclamation." This statement is not accurate. The Operations Boundary is the only applicable restricted area. Please revise.
Tribal Rights and Interests	563	4-669	4.24.2.2	3	PRII	"However, until conclusion of reclamation and restoration efforts, mining effects would continue to alter the nature and potential use of the usual and accustomed fishing locations and springs." A clarification is needed that while there may have been UAA fishing areas historically, these areas have been substantially impacted by legacy mining.
Tribal Rights and Interests	564	4-670	4.24.2.2	1	PRII	"The impact would be localized, long term, and minor to major ." Please provide a basis for this being a major impact per Table 4.1-1.

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests	565	4-670	4.24.2.2	3	PRII	"Existing public access roads would remain open under the 2021 MMP. There would be a public access road route through the mine site during the SGP construction, operations, and closure and reclamation phases. Public (including tribal) motorized access to active mine areas, including haul/access roads, would be restricted during the life of the SGP. Non-motorized access (i.e., walking, hiking, horse) would be restricted in the Operations Area Boundary as well. The impact would be localized, long-term, and moderate." Please include this statement in the introduction to this section to help the reader understand what is actually restricted (noting that it conflicts with other statements in this document, which are incorrect).
Tribal Rights and Interests	566	4-670	4.24.2.2	4	PRII	"However, reclamation could modify the fish, wildlife, and vegetation composition of the area compared to existing conditions. Therefore, traditional land uses could be altered by reclamation. The impact to Tribal access after reclamation would be localized, long term to permanent, and negligible to major." This should state the reclamation modification will be improvements on existing conditions.
Tribal Rights and Interests	567	4-671	4.24.2.2	2	PRII	"Changes in stream water temperatures for the East Fork SFSR would be negligible to major, localized, and long term." Please clarify how slightly higher stream temperatures affect TR&I.
Tribal Rights and Interests	568	4-671	4.24.2.2	6	PRII	"Overall effects of impacts to water resources on tribal treaty rights and resources, in particular fisheries, but also plant and wildlife populations, would be localized to regional, long term to permanent ," Impact to water resources will not be permanent. The SGP will improve overall water quality from baseline conditions. Please delete " permanent ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests	569	4-672	4.24.2.2	3	PRII	"The impact to wetlands would be localized, temporary to permanent, and major which could result in localized, temporary to permanent , and major impacts to usual and accustomed fishing places along Sugar Creek and portions of the East Fork SFSR, as well as tribal treaty rights and resources including those associated with potential historic properties, sacred sites or places, TCPs, and CLs depending on the wetland and the type of tribal use." This statement does not account for the net 63% increase of wetland acres proposed in the MMP and therefore can't be called permanent loss impacts. Please remove " to permanent ".
Tribal Rights and Interests	570	4-672	4.24.2.2	4	PRII	"As part of the Clean Water Act, Section 404 permit, a compensatory mitigation plan would be required to compensate for lost wetland areas and their associated functions. It would also address the temporal loss of aquatic functions and values. There would be a temporal loss of wetland functions in the Salmon River drainage for approximately 20 years (Section 4.11)." Please integrate this statement with the paragraph above because it affects the conclusions of the section overall. Right now, impacts are treated as being completely separate from the mitigation and that is incorrect, especially when some of the mitigation starts early.
Tribal Rights and Interests	571	4-672	4.24.2.2	5	PRII	"During construction and operations, fish bearing streams would be diverted into ditched channels and some new barriers would be created" Only some fish bearing channels would be affected this way. Please revise this statement to reflect this.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests	572	4-672	4.24.2.2	5	PRII	" Entrainment by in-stream activities or human-made features, flow reductions, temperature changes, changes in habitat structure, water quality changes, and reduced access to suitable habitat may affect the distribution and relative abundance of fish populations in affected streams in the SGP area thereby affecting availability and harvestability by the Tribes." Fish mitigation measures in the Fish and Aquatic Habitat Mitigation Plan includes salvage and relocation of fish. Please revise.
Tribal Rights and Interests	573	4-672	4.24.2.2	5	PRII	"Impacts to fisheries would be a localized, long-term to permanent, major impact to tribal treaty rights and resources including those associated with potential historic properties, sacred sites or places, TCPs, and CLs. " This section is about fisheries. Please revise to reflect impacts to fisheries.
Tribal Rights and Interests	574	4-676	4.24.2.2	2	PRII	"Noise would likely displace larger wildlife and change recreational or traditional use experiences including viewsheds and sense of solitude in areas proximate to construction activities." Noise does not affect viewsheds. Please delete " viewsheds ".
Tribal Rights and Interests	575	4-676	4.24.2.2	2	PRII	"Mine and associated infrastructure development and associated noise during the construction phase would be limited to daytime hours (between 7:00 a.m. and 10:00 p.m.)." Please provide a source for this information.
Tribal Rights and Interests	576	4-678	4.24.2.3	2	PRII	"There are six previously identified Native American archaeological sites within the physical APE along Johnson Creek Route that could be potentially affected by the SGP. However, physical impacts to these sites would be avoided through design or protective measures." The Johnson Creek Route already exists. No physical impacts will occur. Please revise.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Tribal Rights and Interests Specialist Report	577	29	6.1.4.5	8 (4th in bulleted list)	PRII	"Other tributaries to the East Fork SFSR in the Operations Area Boundary were not identified as usual and accustomed fishing places (e.g., Meadow Creek , Blowout Creek, Rabbit Creek, Garnet Creek, Fiddle Creek, Midnight Creek, Hennessy Creek, West End Creek). " This is a contradictory statement, as on Page 22 it says "The Tribe's ethnography identifies No Man's Creek, Meadow Creek, and Sugar Creek as traditional fishing areas within the Operations Area Boundary." Please reconcile by deleting " Meadow Creek " from list.
Chapter 5 - Cumulative Effects	578	5-1	5.1.1	3	PRII	"Past, present, and RFFAs include activities, developments, or events that have the potential to change the physical, social, economic, and/or biological nature of a specified area. " Please replace " events " with " actions ".
Chapter 5 - Cumulative Effects	579	5-1 and global	5.1.1	Table 5.1-1	PRII	Please conduct a careful review of the stated CEA against the analysis that is conducted with the cumulative impacts analysis in this chapter, the Chapter 4 analysis, and the resource reports. It appears that several statements of the CEA are incorrect, or the analysis is incomplete. These errors were noticed in Hazardous Materials, Timber, Public Health and Safety, Social and Economic Conditions, Environmental Justice, and Special Designations. For these resources, please verify the accuracy of the CEA with Chapter 4 analysis and the Specialist Reports.
Chapter 5 - Cumulative Effects	580	5-1	5.1.1	Table 5.1-1; Row 6	PRII	"Hazardous Materials: Bounded by the bordering transportation routes that would provide access to the mine site. " This figure has "Roads, Disturbance Areas, Underground Workings, and Patented Claims". It does not indicate any area bounded by the bordering routes. Please revise figure.
Chapter 5 - Cumulative Effects	581	5-1	5.1.1	Table 5.1-1; Row 6	PRII	"Hazardous Materials: SGP components including the mine site and access roads. " Not included in the CEA description in Section 5.7. Please add.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	582	5-2	5.1.1	Table 5.1-1; Row 11	PRII	"...particularly the residents of the village of Yellow Pine, the nearest residential community to the mine site area, as well as recreational visitors who frequent the area " Please delete as this table is only stating area analyzed. Also, these areas are not discussed in the cumulative section 5.18
Chapter 5 - Cumulative Effects	583	5-2	5.1.1	Table 5.1-1; Row 14	PRII	" Valley and Adams Counties ." According to the technical report, the analysis area is the "statewide perspective" including the Indian reservations and some of the transportation corridors that extend beyond the county boundaries. Please change to " statewide ".
Chapter 5 - Cumulative Effects	584	5-3	5.1.2	1	PRII	"Past actions include activities that may have been initiated in the past but may have lingering effects in impacting the environment or may influence trends in the physical, biological, or social environment ." The descriptions below of the PPAs do not describe the "lingering effects" that are occurring nor their spatial overlap with the SGP and therefore the impacts of these actions that may have cumulative effects with the SGP are not made clear.
Chapter 5 - Cumulative Effects	585	5-3	5.1.2	3	PRII	"Past and present actions that have an interactive, synergistic, and/or additive effect (per 40 CFR 1508.7) " "interactive, synergistic, and/or additive" no longer appear in the CEQ regulations. Please delete reference.
Chapter 5 - Cumulative Effects	586	5-3	5.1.2	6	PRII	" Other past and/or present mining projects considered in the cumulative effects analysis include " There is no spatial overlap of these with Stibnite. Please clarify which are in the same basin (EFSF) such that WQ/sediment/fisheries effects would accumulate within the CEAs outlined in the table above. Also, the reader is unlikely to understand the location of at least several of these projects without a figure.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	587	5-4	5.1.2	6 (bulleted list)	PRII	" Exploration drilling was conducted in 26 drill areas within NFS land. " This bullet is titled "Monitoring Well" but mentions exploration drilling. Please revise to read "Monitoring Wells and Exploratory Drilling for the Golden Meadows Project (2013)"
Chapter 5 - Cumulative Effects	588	5-5	5.1.2	3	PRII	"Approximately 141,000 gallons of fuel (diesel, gasoline, and jet fuel) per calendar year was transported on existing Valley County roads to the fuel storage facility (located on private land) (Forest Service 2015). " Please clarify whether there were spills in past fuel hauls that contribute to cumulative impacts.
Chapter 5 - Cumulative Effects	589	5-5	5.1.2	4 (bulleted list)	PRII	" Perpetua is investigating 24 locations by drilling or excavating 40 borings/test pits along the proposed Burntlog Route (Midas Gold 2019e). " This has not been conducted yet as presented in table 5.1-2 and will be conducted in 2023.
Chapter 5 - Cumulative Effects	590	5-6	5.1.2	7 (bulleted list)	PRII	"Road Maintenance of State Roads " Please include Warm Lake Highway in this bullet
Chapter 5 - Cumulative Effects	591	5-7	5.1.2	2	PRII	"In fall of 2021, the Krassel Ranger District conducted prescribed burns to areas east of Yellow Pine (Bald Hill project area) and along the SFSR (Four Mile project areas). " This section is about wildland fire. Prescribed burns would not fall under wildland fire . Please revise the section description to include prescribed burns or move this sentence to Forest Management.
Chapter 5 - Cumulative Effects	592	5-8	5.1.2	3	PRII	"Since 2008, Chinook salmon spawners were released into Meadow Creek most years . " Recently this has occurred once every 3 years or so. Please replace " most " with " a majority of "
Chapter 5 - Cumulative Effects	593	5-8	5.1.3	5	PRII	" Reasonably Foreseeable Future Actions " Please provide the definition and criteria for "reasonably foreseeable" and include it in the glossary.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	594	5-8	5.1.3	Table 5.1-2, Row 2, Column 3	PRII	"Scoping for the East Fork RAMP estimated to start late 2021 ." This date is over a year in the past, please update with current information.
Chapter 5 - Cumulative Effects	595	5-9	5.1.3	Table 5.1-2, Row 3, Column 4	PRII	"Burntlog Route Geophysical Investigation: This project is currently on hold ." This investigation is planned for 2023. Please revise as appropriate for the FEIS.
Chapter 5 - Cumulative Effects	596	5-9	5.1.3	Table 5.1-2, Row 5, Column 4	PRII	"Nez Perce Tribe Research Equipment: Scoping initiation: 11/2021; Expected Decision: 05/2022; Expected Implementation: 06/2022 " Dates are all in past as of SDEIS pub date. Please update with current information.
Chapter 5 - Cumulative Effects	597	5-9	5.1.3	Table 5.1-2, Row 6	PRII	The Stallion Gold Horse Heaven Project is not on the current SOPA and the table provides no estimated dates of implementation. Suggest removing this Project here and any additional mentions in this document unless the project progresses to submittal of a proposed action.
Chapter 5 - Cumulative Effects	598	5-9	5.1.3	Table 5.1-2, footnote	PRII	"CE = <i>Categorical Exemption</i> " Please replace " Exemption " with " Exclusion " for accuracy.
Chapter 5 - Cumulative Effects	599	Global	-	-	PRII	This chapter uses the word significant, yet does not establish the definition of significance, establish significance levels, or other objective criteria. Please include the basis for this judgement.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	600	5-10	5.2.2	4	PRII	<p>"...as well as combine with any future mine operations in the region, such as the Horse Heaven Project, which would further deplete ore reserves. " Please remove this statement (see Comment 19) or provide rationale for its inclusion. This project has not yet submitted a proposed action for exploration drilling, much less mining; and the comment that it would further deplete resources is therefore also speculative and should be removed. Please provide in this section a definition of "reasonably foreseeable", and unless this project can be demonstrated to meet the criteria of RFFA defined below, it should not be considered in this document.</p> <p>36 CFR 220.3 defines Reasonably foreseeable future actions as: Those Federal or non-Federal activities not yet undertaken, for which there are existing decisions, funding, or identified proposals. To our knowledge, the Stallion Gold Horse Heaven Project meets none of these criteria.</p>
Chapter 5 - Cumulative Effects	601	5-10	5.2.2	5	PRII	<p>"Both action alternatives would increase risks from mass wasting hazards ..." - Please provide rational for the purpose of this paragraph or remove. It does not identify any cumulative impacts on geology or geotechnical hazards.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	602	5-11	5.3.2	6	PRII	"Transport from far more distant urban regions, even overseas, may contribute to local air conditions (eTransport from far more distant urban regions, even overseas, may contribute to local air conditions (e.g., ozone) but are not in the scope of a cumulative effects analysis. " This is incorrect. The impacts from distance sources should be disclosed in the No Action. If it truly is affecting local air quality , it needs to be disclosed in the cumulative effect, although it might not be able to be quantified. They certainly are within the scope of the analysis. Maybe this meant to say they are not quantified.
Chapter 5 - Cumulative Effects	603	5-12	5.3.2	2	PRII	"The ambient air data for CO, NO2, SO2, and on-site data for PM10 and PM2.5 indicate the existing impacts from off-site sources on air quality near the SGP area was reviewed for this analysis (Section 3.3). These background ambient air measurements offer the best indication of cumulative effects due to current emissions sources. Although some background measurements of ozone in the Boise urban area are above the NAAQS, the ozone baseline value for this assessment recommended by the IDEQ is compliant with the NAAQS. The monitored baseline values used for the SGP air quality impact assessment were obtained at locations that are more developed than the SGP area. By comparison, the cumulative effects in the analysis area due to current activities and air emission sources would be minor. " Recommend these sentences be moved to the No Action section.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	604	5-12	5.3.2	3	PRII	"There are no other permitted sources of HAP emissions in the vicinity of the SGP area. One source, the Tamarack Mill, LLC is 75 miles from the SGP, and has reported minor source level emissions to IDEQ. The HAP emission inventory in the vicinity of the SGP area is unknown; however, given the absence of large HAP emission sources near the SGP area, it can be assumed that the baseline HAP cumulative effects are low." Recommend these sentences be moved to the No Action section.
Chapter 5 - Cumulative Effects	605	5-12	5.3.2	Table 5.3-1	PRII	"RFFAs Considered Regarding Cumulative Air Quality Effects for Specific Planning Projects " Please provide information about whether these projects will be concurrent with SGP.
Chapter 5 - Cumulative Effects	606	5-13	5.3.2	Table 5.3-2; Row 2	PRII	"Natural Emission Events: Wildland fires" This is not an action. Please delete.
Chapter 5 - Cumulative Effects	607	5-14	5.4	4	PRII	"Climate Change" Please define the CEA here as it is in Table 5.1-1
Chapter 5 - Cumulative Effects	608	5-17	5.5.1	4	PRII	"The effects of past mining activities and their long-term impacts to soils would remain except for the removal of legacy mine waste materials under Phase I of the ASAOC." Please specify what these impacts (effects) are.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	609	5-17	5.5.1	5 & 6	PRII	<p>"Although none of the RFFAs identified in Table 5.1-3, except for the future geophysical work along the Burntlog Route, would physically overlap with the action alternative disturbance footprints, forest management, motorized use of road systems, fire suppression, prescribed fire and wildfire, dispersed camping, fishing, and hunting activities would continue in the CEA and vicinity, which would continue to utilize dedicated facilities (areas of TSRC) or contribute to incremental DD effects.</p> <p>Under the No Action Alternative, Perpetua would continue to comply with reclamation and monitoring commitments included in the applicable Golden Meadows Exploration Project Plan of Operations and EA, which include reclamation of the drill pads and temporary roads by backfilling, re-contouring, and seeding using standard reclamation practices; however, as described in the Golden Meadows EA, the exploration and subsequent reclamation activities would have an insignificant direct effect to geology and soils and therefore an insignificant cumulative contribution to effects upon soils and RCM . "</p> <p>Please define TSRC, DD, and RCM here for reader.</p>

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	610	5-17	5.5.1	5	PRII	"Although none of the RFFAs identified in Table 5.1-3, except for the future geophysical work along the Burntlog Route, would physically overlap with the action alternative disturbance footprints, forest management, motorized use of road systems, fire suppression, prescribed fire and wildfire, dispersed camping, fishing, and hunting activities would continue in the CEA and vicinity, which would continue to utilize dedicated facilities (areas of TSRC) or contribute to incremental DD effects." Please clarify the level of incremental impacts, and use defined Impact Definitions in cumulative impact analysis.
Chapter 5 - Cumulative Effects	611	5-17	5.5.1	6	PRII	"however, as described in the Golden Meadows EA, the exploration and subsequent reclamation activities would have an insignificant direct effect to geology and soils and therefore an insignificant cumulative contribution to effects upon soils and RCM." Please clarify how insignificant is defined, and please use defined Impact Definitions in cumulative impact analysis.
Chapter 5 - Cumulative Effects	612	5-18	5.6	5	PRII	" Noise " Please describe the lack of cumulative noise impacts and that only concurrent noise would be cumulative, similar to what was described in the Air section.
Chapter 5 - Cumulative Effects	613	5-18	5.6	5	PRII	"Noise related to access traffic and haul roads is of importance to persons along nearby public roads and in nearby residences." This is a direct impact rather than a cumulative one.
Chapter 5 - Cumulative Effects	614	5-18	5.6	7	PRII	"Past actions include activities such as mineral exploration, infrastructure development, and non-mining related actions are unlikely to present current noise impacts ." Please replace " are unlikely" to " would not contribute "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	615	5-19	5.6	2	PRII	"The SGP has the greatest potential to contribute to cumulative noise impacts in the vicinity of the FCRNRW. However, given the mountainous topography, cumulative impacts would likely only occur if other ongoing or future actions in the general area occur within the same mountain valley or on nearby ridgelines ." If data exists, please include whether the SGP noise added to the concurrent noise would breach any noise thresholds.
Chapter 5 - Cumulative Effects	616	5-19	5.7	4	PRII	"The CEA for hazardous materials is bound by the bordering transportation routes that would provide access to the SGP ." This does not match Table 5.1-1 - please reconcile.
Chapter 5 - Cumulative Effects	617	5-20	5.7.2	3 (bulleted list)	PRII	"The SGP has included transportation of fuel (diesel, gasoline, and jet fuel) to the mine site. This activity occurs on existing County and Forest Service roads ." Please delete or clarify rationale for including this in the absence of spills with persistent impacts.
Chapter 5 - Cumulative Effects	618	5-20	5.7.2	6	PRII	"however, this project would involve 10,600 acres of treatment over a short period of time, such that the contribution of the action alternatives combined with this, and other similar projects would result in negligible changes to the overall traffic volume ." This conclusion sentence is about overall traffic volume but this section is about Hazardous Materials. Please conclude about Hazardous Materials or make clear connection to Hazardous Materials.
Chapter 5 - Cumulative Effects	619	5-21	5.9	4	PRII	"Cumulative effects associated with the SGP consider the range of existing and foreseeable activities and their potential effects with respect to surface water and groundwater quality ." Please replace "existing and foreseeable" with " past, present and reasonably foreseeable "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	620	5-21	5.9	5 (bulleted list)	PRII	" Gold Stallion Horse Heaven Project " - As noted in previous comments, please provide definition of RFFA and rationale for including this project, or remove it. 36 CFR 220.3 defines Reasonably foreseeable future actions as: Those Federal or non-Federal activities not yet undertaken, for which there are existing decisions, funding, or identified proposals. To our knowledge, the Stallion Gold Horse Heaven Project meets none of these criteria and therefore should be removed as an identified RFFA.
Chapter 5 - Cumulative Effects	621	5-22	5.9.1	1	PRII	" <i>The continuation of approved exploration activities at the SGP by Perpetua could cumulatively increase stream sediment levels resulting from surface disturbance and erosion.</i> " This should be characterized as a small potential cumulative impact as is scope and disturbance area is quite small. Same as was done below where it is stated that: " <i>However, as described in the Golden Meadows Environmental Assessment, the exploration and subsequent reclamation activities would have only a small direct effect on wetland and riparian resources, as the disturbance footprint is confined to exploration holes.</i> "

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	622	5-22	5.9.2	2	PRII	"Compared to the No Action Alternative, the 2021 MMP would remove additional legacy mining materials and further reduce their impacts on water quality but would also contribute new sources of mine waste material to the East Fork SFSR drainage." If the ASAOC will reduce legacy mining materials AND the 2021 MMP would remove additional legacy mining materials, then the result would be a beneficial cumulative impact - the reduction of legacy mining materials. Then when combined with the fact that the 2021 MMP would reduce constituent levels of arsenic and antimony, then there would also be a beneficial cumulative impact on water quality. Please include this information.
Chapter 5 - Cumulative Effects	623	5-22	5.9.2	2	PRII	"Compared to the No Action Alternative, the 2021 MMP would remove additional legacy mining materials and further reduce their impacts on water quality but would also contribute new sources of mine waste material to the East Fork SFSR drainage ." New sources of mine waste in far more protective storage areas and technologies are not equivalent to legacy mining materials that were disposed without such storage protections. It is incorrect to imply that they are equivalent. Please revise to reflect this.
Chapter 5 - Cumulative Effects	624	5-22	5.9.3	5	PRII	"This would increase traffic on Johnson Creek Route during the mine operational and reclamation period, leading to potentially higher erosion rates from the road surface along the Johnson Creek Route. " Please acknowledge in this statement that the use of binders and road resurfacing could lead to a net decrease of dust and erosion along Johnson Cr route.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	625	5-23	5.10	Table 5.10-1; Row 6, Column 2	PRII	"Exploration activities for potential future mining development in the vegetation analysis area have likely impacted vegetation via removal and soil compaction at drill pad sites and temporary roads and will likely continue to do so as these activities continue." Compaction is reversed upon reclamation by a variety of techniques. Please revise.
Chapter 5 - Cumulative Effects	626	5-23	5.10	2	PRII	"These RFFAs would result in loss of habitat, but all projects (private or federal actions) would have to meet the requirements of Section 7 of the ESA, which include consultation with federal agencies on listed plant species, completion of appropriate analysis documents, and compliance with agency-mandated reasonable and prudent measures to protect listed species." ESA does not deal with general vegetation resources. This should be moved to 5.13 Wildlife and Wildlife Habitat including Threatened, Endangered, Proposed, and Sensitive Species.
Chapter 5 - Cumulative Effects	627	5-24	5.10	Table 5.10-2	PRII	"This project is located primarily along the East Fork SFSR and Meadow Creek at the mine site and would result in disturbance to vegetation" - Please provide a more accurate description here of vegetation impacts; these actions will also facilitate wetland restoration and reforestation where there were previously barren or poorly revegetated waste piles.
Chapter 5 - Cumulative Effects	628	5-24	5.10	Table 5.10-2	PRII	Stallion Gold – Horse Heaven Project' - Please provide the rationale for including this project as an RFFA or remove. It does not meet the definition of RFFA per 36 CFR 220.3.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	629	5-24	5.10.1	2	PRII	"Therefore, implementation of the No Action Alternative would present a minimal cumulative contribution to impacts to vegetation resources." ASAOC is a part of the No Action Alternative. Please include. And as noted in comment above, ASAOC activities facilitate wetland restoration and reforestation where there were previously barren or poorly revegetated waste piles.
Chapter 5 - Cumulative Effects	630	5-24	5.10.2	4	PRII	"The 2021 MMP would result in the largest contribution to mining-related cumulative impacts to vegetation communities with the Johnson Creek Route Alternative impacting approximately 251 acres less." Please replace "the largest" with "a larger" Please define the impacts to the vegetation as these are not expressly stated.
Chapter 5 - Cumulative Effects	631	5-25	5.10.2	2	PRII	"Other past and present actions (Table 5.10-1) and RFFAs (Table 5.10-2) have and would likely impact vegetation communities, occurrences of special status plants including whitebark pine, habitats for special status plants, and distribution of non-native plants throughout the analysis area." Please provide the necessary information to show or indicate that these impacts would overlap spatially, particularly the RFFAs.
Chapter 5 - Cumulative Effects	632	5-25	5.10.2	2	PRII	"For whitebark pine, the potential for cumulative impacts would be lowest under the Johnson Creek Route Alternative and highest under the 2021 MMP based on disturbance acreage and estimated number of trees removed." Please move this statement to Section 5.13 Wildlife and Wildlife Habitat including Threatened, Endangered, Proposed, and Sensitive Species

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	633	5-25	5.11	3	PRII	"Potential cumulative effects to wetlands are limited to ASAOC activities" - Please clarify for the reader. This is presented as negative wetland impacts, although the ASAOC activities are required to replace impacted wetlands.
Chapter 5 - Cumulative Effects	634	5-26	5.11.1	1	PRII	"Although no new impacts would occur, existing elevated arsenic, antimony, and mercury concentrations would continue to contribute to contaminant loading to surface water, affecting adjacent and downstream wetlands." Please clarify that these are due to legacy mining.
Chapter 5 - Cumulative Effects	635	5-26	5.11.3	6	PRII	" It is assumed that required compensatory wetland mitigation would replace all permanently lost wetland acreages and functions, and therefore this alternative would not contribute to cumulative losses of wetland acreages or functions in the wetland and riparian resources CEA." Please delete " It is assumed that " as compensatory mitigation is required under Section 404, and if the JC Route Alternative were selected, PRII's Compensatory Mitigation Plan would apply.
Chapter 5 - Cumulative Effects	636	5-27	5.12	2	PRII	"Reasonably foreseeable future actions that could cumulatively contribute to fisheries and aquatic habitat impacts in the analysis area include:" Section 5.12.3 says "Improvements to fish ORVs would likely result from the RFFAs." Please include that in this section as well.
Chapter 5 - Cumulative Effects	637	5-27	5.12	3 (bulleted list)	PRII	" Stallion Gold Horse Heaven Project " Please remove reference to this project in this document, including in Section 5.12.1 below. It does not meet the definition of RFFA per 36 CFR 220.3.

Attachment A: Stibnite Gold Project Other Resources SDEIS Compilation Table

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	638	5-27	5.12.1	4	PRII	"These previously approved activities include construction of several temporary roads (approximately 0.32 mile of temporary roads) to access drill sites (total of 28 drill sites), drill pad construction (total of 182 drill pads) and drilling on both Forest Service and private lands at and in the vicinity of the SGP. " Please clarify that this is a rolling disturbance limit not 182 drill pads all at once.
Chapter 5 - Cumulative Effects	639	5-27	5.12.2	5	PRII	" Some of the RFFAs (Table 5.1-2) " Table 5.1-2 does not include RFFAs, rather it includes impact types and effects. Please edit to "Some of the effects of some RFFAs..."
Chapter 5 - Cumulative Effects	640	5-28	5.13	entire section	PRII	"Wildlife and Wildlife Habitat including Threatened, Endangered, Proposed, and Sensitive Species " Federally listed wildlife and wildlife habitat for T&E species are covered here, but federally listed fish are not. Nor are they discussed in any detail under Fish and Fish Habitat. Please add.
Chapter 5 - Cumulative Effects	641	5-29	5.13	Table 5.13-1, Row 1	PRII	"During exploratory drilling, development, and operations, the increased noise and light impacts and road networks will be a source of disturbance and mortality for wildlife and will likely also displace several species . " Please provide information on which species would be displaced and why.
Chapter 5 - Cumulative Effects	642	5-29	5.13	Table 5.13-1, Row 2	PRII	"Early seral and grassland habitats would be available for wildlife within a short time, while mature forest types would not be available for decades. " Please replace "seral" with " successional " for ease of understanding by the general public.
Chapter 5 - Cumulative Effects	643	5-29	5.13.1	2	PRII	Please clarify for the No Action Alternative that " <i>continued exploration work at Stibnite</i> " could occur...not would . Also, references to ASAOC activities will likely require updating in the FEIS as they will by then have occurred in 2022 and 2023.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	644	5-31	5.13.2	1	PRII	"However, the 2021 MMP would likely result in impacts that would be considered to permanently contribute to an adverse cumulative impact on these resources when combined with past, present, or RFFAs ." This statement does not appear to be supported by evidence presented in this section. Immediately above this statement is: "However, the region is still somewhat remote and relatively wild, and the types of projects listed above are unlikely to significantly change this wilderness character in the near term, with the exception of additional wildfires reducing mature forest structure ." So, if RFFAs would not significantly affect...please clarify how would there be cumulative impacts.
Chapter 5 - Cumulative Effects	645	5-31	5.14	entire section	PRII	" Timber Resources " Please provide the definition of timber resources used. It is only concerned with commercial timber, and not even future commercial timber (which might not be commercial now). Please provide measurements in the definition.
Chapter 5 - Cumulative Effects	646	5-31	5.14	4	PRII	"This includes past and present actions that have, or are currently, affecting timber resources and areas from which timber is harvested, " Please clarify if past actions are considered. It is unclear.
Chapter 5 - Cumulative Effects	647	5-31	5.14	4	PRII	"Projects with a vegetation management component that includes incidental removal of conifer tree species would not be considered to cumulatively contribute to timber resource impacts in the CEA unless the project included sale of the cut conifer trees . " Please clarify. If a conifer is cut down and left to rot, used to create an in-stream structure, or sold for lumber, it is removed from the resource.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	648	5-31	5.14.1	5 & 6	PRII	"None of the current and future forest management projects within the timber resources CEA include a commercial timber sale component and are therefore not considered to contribute to cumulative impacts on timber resources. " AND "None of the currently planned or future mine development projects in the CEA include sale of cut trees at this time and therefore were determined to not contribute to potential cumulative effects on timber resources. " Please provide a source for this information. Both the PNF and the BNF have future commercial timber sale bidding opportunities posted on their websites.
Chapter 5 - Cumulative Effects	649	5-32	5.14.4	2	PRII	"Both Big Creek Fuels Reduction and the Granite Meadows projects include explicit discussions of commercial timber sales associated with fuels reduction activities therefore they both could contribute to cumulative effects on timber resources. " This is a current/future forest management project that includes a commercial sale component. Please revise earlier statements that say there are none of these projects.
Chapter 5 - Cumulative Effects	650	5-32	5.14.6	5	PRII	" Action Alternatives " None of the NEPA action alts are discussed here, just the other non-SGP RFFAs, which would also be part of the No Action just above.
Chapter 5 - Cumulative Effects	651	5-32	5.14.6	5	PRII	" It is unknown if any portions of these areas would occur on land suited for timber production, but if the entire acreage was on land suited for timber production, the combined harvest area would only represent 20 percent of the suited lands on the PNF. " Please remove this hypothetical sentence to decrease chance of confusion.
Chapter 5 - Cumulative Effects	652	5-33	5.15.2	entire section	PRII	" Action Alternatives " Please provide a conclusion.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	653	5-34	5.16	entire section	PRII	" Access and Transportation " Access and transportation direct and indirect effects include air, water and rail. Please included in this subsection.
Chapter 5 - Cumulative Effects	654	5-35	5.16.2	1	PRII	" <i>The contribution to traffic volumes of the action alternatives which include traffic generated from the reconstruction of the transmission line combined with these projects would likely have a greater cumulative effect on the roadways closer to the SGP.</i> " Please clarify if there is an assumption that other projects will use Burntlog Route for access.
Chapter 5 - Cumulative Effects	655	5-35	5.16.2	3	PRII	" <i>The ASAOC (EPA 2021) (Table 5.1-3) would be additive to anticipated SGP traffic.</i> " ASAOC precedes SGP , which means it would not be temporally additive. ASAOC is also part of the No Action, in which it is additive to Golden meadows exploration and other geotech programs, NOT the SGP. Please revise.
Chapter 5 - Cumulative Effects	656	5-35	5.16.2	Table 5.17-1, Column 2, Row 2	PRII	" <i>Projects that are currently undergoing reclamation or will in the future would likely cause further damage to any historic properties in the area. These projects would likely be closed, which involves the removal of some of the infrastructure and reclamation of the land to restore native wildlife and plant habitats that are important to Native American tribes. However, mature forest types wouldn't be available for decades. Several CERCLA Removal Actions were conducted by the Forest Service, EPA, and Exxon-Mobil Corporation. These actions also can impact historic properties by removing potentially hazardous, but also historic, tailings and capping historic dumps.</i> " Please replace " would likely " with " could possibly ". Please delete sentence regarding mature forest types.

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Chapter 5 - Cumulative Effects	657	5-37	5.17.2	3	PRII	"For all RFFAs on federally managed lands historic properties would be governed by the NHPA Section 106 process. " Please also reference the Section 106 process and Programmatic Agreement that will be finalized for the SGP, reducing the potential for cumulative impacts.
Chapter 5 - Cumulative Effects	658	5-37	5.18	entire section	PRII	" Public Health and Safety " Table 5.1-1 calls out "particularly the residents of the village of Yellow Pine, the nearest residential community to the mine site area, as well as recreational visitors who frequent the area ." These are not discussed in the cumulative impacts. Please include or delete from table.
Chapter 5 - Cumulative Effects	659	5-37	5.18	4	PRII	"Existing and RFFAs have the potential to result in cumulative impacts by increasing variables related to public health and safety." Please specifically identify which impacts have the potential for cumulative impacts.
Chapter 5 - Cumulative Effects	660	5-38	5.19	4	PRII	"Present actions include mining projects and their related activities (i.e., exploration, reclamation) that are currently underway and are causing impacts ." Please specify the impacts.
Chapter 5 - Cumulative Effects	661	5-38	5.19	entire section	PRII	Please define ROS in this section.
Chapter 5 - Cumulative Effects	662	5-39	5.20.1	6	PRII	"such as those associated with the Meadow Gold exploration project " Please replace " Meadow Gold " with " Golden Meadow "
Chapter 5 - Cumulative Effects	663	5-41	5.21.2	3	PRII	"Further, there would be a related level of adverse cumulative effects to housing availability, housing affordability, community services, and infrastructure " Please consider foreseeable infrastructure improvements and services funded or provided by the mine or revenues generated from it.

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	664	5-43	5.23.1.2	2	PRII	"As such, the 2021 MMP, in combination with the RFFAs, could cumulatively impact the untrammeled quality of wilderness character ." This sentence seems to conflict with what precedes it in this section. Also, "the RFFAs" in the preceding passage are considered as a whole, and the specific operating hours and management practices are not qualified. Please revise to clarify how this conclusion of cumulative impacts is made.
Chapter 5 - Cumulative Effects	665	5-44	5.23.1.2	1	PRII	"Reducing sediment in the drainage would improve water quality and indirectly fish habitat quality. " Please add restoration and enhancement of physical habitat to this list.
Chapter 5 - Cumulative Effects	666	5-45	5.23.3	1	PRII	"Effects on IRAs and the lands contiguous to unroaded areas could overlap in space and time with the direct and indirect effects and the following RFFAs " Please define the CEA in this section.
Chapter 5 - Cumulative Effects	667	5-46	5.23.3.3	5	PRII	"Surveys and treatments implemented for the Johnson Creek Route Alternative and the RFFAs would cumulatively reduce the effects on the natural roadless character. " This would also be true for the MMP. Please include in that section as well.
Chapter 5 - Cumulative Effects	668	5-47	5.23.4	3	PRII	"The RFFAs that could contribute to cumulative changes in research values, ecological site conditions, or change ecological processes within the CEA are: " Please define the CEA in this section.
Chapter 5 - Cumulative Effects	669	5-48	5.24	4	PRII	"For this reason, it is recognized that in addition to the SGP, other mining project developments expected to occur in the analysis area, Valley County, and possibly elsewhere in the region also may contribute to adversely affecting traditional tribal cultural practices and places that have significance to tribal cultural identities. " Please replace " may contribute to adversely affecting traditional " with " may affect traditional ".

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Chapter 5 - Cumulative Effects	670	5-49	5.24	Table 5.24-1; Row 2; Column 2	PRII	This paragraph is contradictory. It starts with: " <i>Projects that are currently undergoing reclamation or will in the future would likely cause further damage to any tribal treaty rights, tribal resources, historic properties, sacred sites or places, TCPs, and CLs in the area.</i> " It ends with: " <i>These actions have the potential to restore landscapes that can eventually restore traditional tribal resources by removing potentially hazardous wastes, mining tailings, and capping historic waste rock dumps.</i> " Please clarify.
Chapter 5 - Cumulative Effects	671	5-49	5.24	Table 5.24-1; Row 3; Column 2	PRII	" <i>This activity would be a potential impact to any tribal resources present in those areas.</i> " What are the specific impacts? Please clarify.
Appendix A	672	A-3	2.1.2	9	PRII	" <i>The waiving of the above standards meets the following purpose and needs for the SGP:</i> " These purpose and need statements no longer reflect the purpose and needs stated in Chapter 1. Please update to ensure that the amendments still meet the purpose and need as revised.
Appendix A	673	A-5	2.1.2	Table 1; Row 1; Column 4	PRII	" <i>except for areas under the Tailings Storage Facility (TSF)/TSF Buttress and in the vicinity of backfilled open pits where some metal concentrations are predicted to exceed baseline conditions (Section 4.9.2.2).</i> " Please provide the timeframe for this. And acknowledge that there is an overall improvement long term.
Appendix A	674	A-12	2.2.2	6	PRII	" <i>In the PNF Activity Area for the SGP, which is comprised of the PNF portion of the Headwaters East Fork South Fork Salmon River, Sugar Creek, and No Man's Creek- East Fork South Fork Salmon River subwatersheds where existing conditions of TSRC are below 5 percent of the area, waive the requirement that management activities shall leave the area in a condition of 5 percent or less TSRC following completion of the activities.</i> " Is a replacement percentage required?

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Resource	Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Reviewer Initials	Comment
Appendix A	675	A-12	2.2.2	8	PRII	"The amendment of this standard meets the following purpose and needs for the SGP: " These purpose and need statements no longer reflect the purpose and needs stated in Chapter 1. Update, and make sure that the amendments still meet the purpose and need as revised.
Appendix A	676	A-22	2.3.2	5	PRII	"The suspension or modifications of these standards meet the following purpose and needs for the SGP: " These purpose and need statements no longer reflect the purpose and needs stated in Chapter 1. Please update to ensure that the amendments still meet the purpose and need as revised.
Appendix A	677	A-25	2.3.2	Table 3; Row 3; Column 4	PRII	219.9 Sustainability, under the last column, please revise " <i>The existing upgrades to the transmission line...</i> " to be " The upgrades to the existing transmission line... "
Appendix A	678	A-29	2.4.2	entire section	PRII	"2.4.2 Proposed Amendment " Please clarify if new VQO's need to be established since the others are waived.
Appendix A	679	A-29	2.4.2	8	PRII	"The suspension or modifications of these standards meet the following purpose and needs for the SGP: " These purpose and need statements no longer reflect the purpose and needs stated in Chapter 1. Please update to ensure that the amendments still meet the purpose and need as revised.