

January 10, 2023

Dear Linda Jackson, Payette River Supervisor, USFS Chief Randy Moore, USFS Associate Chief Angela Coleman, and NEPA Committee,

I have had the privilege and opportunity to grow up in and around the Salmon River drainages and tributaries and the East Fork of the South Fork of the Salmon and the South Fork of the Salmon are some of the most spectacular places in our country and deserve to be protected for future generations. Further, these areas provide substantial opportunities both for sustenance and protection of natural ecosystems and economic opportunities through recreation and water resources.

I am concerned that the proposed Stibnite Gold project would result in significant negative impacts to local and regional economies, community coherence and resilience, water resources, fish and wildlife, public safety, and the interconnected ecosystems within the watershed. As experts have provided data and information that support the costs of this project would far outweigh the benefits and the SDEIS has not provided the data and information required by NEPA (namely that relevant information will be made available to the public who also play a role in both the decision-making process and the implementation of that decision), I am writing to support you and the Forest Service to make the decision *NOT* to approve the Stibnite Gold Mine. I am further writing to request that you extend the comment period as, there was not sufficient time given for individuals working, with families, and/or with holiday obligations to adequately have the time and opportunity to engage in NEPA, of which public participation is a foundational component.

Finally, the SDEIS stated an incorrect description of the existing environment, included overstated benefits, had missing information, alternatives, and analysis (which were particularly outlined in comments that requested a SDEIS), made unreasonable assumptions, and included contradictory statements and claims. Legally, based on law such as “Accordingly, the Forest Service must take a ‘hard look’ at the environmental impacts of the Stibnite Gold Project, which means that the agency’s decision must not rely ‘on incorrect assumptions or data in an EIS.’” *Native Ecosystems Council v. U.S. Forest Service*, 418 F.3d 953, 964 (9th Cir.2005), further research and more accurate reporting of data and analysis for public review is needed.

Additionally, the permitting process has been repeatedly delayed as Midas Gold (now Perpetua Resources) has repeatedly failed to provide accurate and timely information, and made repeated and fundamental changes to the mine plan midway through the NEPA process. This changing of plans indicates that there will be continued changes made by Perpetua, that the public would not be able to review as part of and required by NEPA. The public needs to be provided with truthful and accurate information. Would the USFS stand behind in a court of law the accuracy of all statements provided in the SDEIS? While neither Perpetua nor the SDEIS contractor is legally obligated to provide accurate, truthful, and complete information, NEPA clearly requires the USFS to stand behind the information in the SDEIS as accurate, truthful, and complete.

While I hope that you provide more time for public review and comment, at this time, I am submitting the following specifics and issues which were not addressed and considered in the SDEIS...

1. Poor Track Record and Lack of Accountability History of Barrick/ Lack of plan for post-project:

It is worth researching the community and environmental-impact record of Barrick, the international gold mining business that is Midas Gold's largest investor. While there are many examples of severe economic, environmental, and social-cultural costs in all of their mines throughout 15 countries, one example is Barrick's Porgera Mine in Papua New Guinea. International reports, such as "Plea for Assistance with Pollution from Porgera Mine" attribute health and environmental problems and a loss of local water rights to Barrick's Porgera Mine in Papua New Guinea, and further reports, including one from Human Rights Watch, report brutal acts of gang rape of women carried out by the mine's security force. The Human Rights Watch report includes a financial summary of the company to put in context the gross financial benefit Barrick mining companies typically gain at the cost of local communities and their environments. In the case of the Barrick Porgera mine, over the span of 20 years, in spite of gross local economic, environmental, and social-cultural costs, the international company grossly benefited, producing 20 billion USD of gold for sales. Barrick's investment in Midas Gold allows it to benefit from the extraction and potentially easily exit after when the time comes for accountability to ensure water quality and environmental, economic, and social-cultural benefits for the local area. What weight does track record hold in analysis and assessment of DEIS and SDEIS and post extraction plans? The proposal significantly lacks a plan for water quality and accountability after the project is completed. Please provide these and relevant research in further information for public review.

2. Lack of addressing Migratory Bird and Wildlife impacts

Regarding Wildlife, 1) The project directly and indirectly impacts hundreds of thousands of acres of wolverine habitat as a result of mine activities (Chapter 4.13.2.1.3.2). Wolverines are specially designated, and therefore the DEIS and proposed alternatives need to account for the special designation, and they do not. Please provide this in a supplemental DEIS for public comment. Similarly, the Direct impacts on gray wolves would include and direct/indirect impact to individuals and habitat loss (Chapter 4.13.2.2.4.1).

The Migratory Bird Treaty Act prohibits actions that kill birds on the list of migratory bird species. Executive Order 13186 directs the US Forest Service to protect migrating birds and promote their conservation. In the DEIS, Opinion M-37050 (3.13.2.4) is noted

stating that “incidental” takes of migratory birds are not prohibited. In August 2020 the above opinion was rejected by the court. The court stated that it is unlawful to kill birds “by any means whatever or in any manner”, including incidental takes.

With this in mind, project actions that kill migratory birds must be readdressed to comply with the court ruling. These include emissions, removal of nest trees, etc. In addition, I was unable to locate a discussion in the DEIS or SDEIS of the effects of arsenic, mercury, etc on water birds that may land on the pit lakes, potentially causing mortality.

3. Recreation Impacts and DEIS and SDEIS Oversight, Omissions, and out of date references

It is noted in the DEIS that the local communities rely heavily on tourism to support their economies” and that “[t]he analysis area is a popular area for a variety of recreation activities on both private and public lands,” yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly.

Sources are out of date (many are 2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities. Idaho’s Recreation and tourism generates \$7.8 billion in consumer spending and support 78,000 jobs; 79% of Idaho’s residents participate in outdoor recreation; and recreation opportunities is a recruitment tool for businesses used to attract and retain workers (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020).

Recreation and tourism are a big deal locally, state-wide, and nationally and thus, please provide the missing information on impacts to recreation and recreation and tourism economies as related to the Stibnite Alternatives and a management plan and contingencies for the recreation in the area per each alternative.

Specifics from the DEIS that were not addressed in the SDEIS

1. In Section 3.4.3.3.17 SOCIAL AND ECONOMIC CONDITIONS, the DEIS notes that “Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies” and yet the Recreation section of the DEIS (3.19 beginning on page 603) does not include any information on the impact the project will have on local recreation.

- Please provide an economic analysis of the local tourism economy and the

Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

2. The cited recreation use on pg. 603 “The analysis area is a popular area for a variety of recreation activities on both private and public lands.” A summary statement of the importance and abundance of recreation in the analysis area is provided; however, the entirety of the recreation section does not mention or address how recreation will be impacted by the Stibnite project, nor does it provide recent sources in its descriptions of uses (sources are out of dates, esp. In the context of Idaho’s booming population, noting its value of recreation ([census.gov](https://www.census.gov), 2020; Foy, 2020; Raphelson, 2017; Men’s Journal, 2019). Please provide information on impacts to economic and social cultural benefits of recreation to local communities and state, national, and international visitors in a supplemental DEIS that can be reviewed.

3. Cited on pg. 615 “Recreation is considered a major use in the Big Creek area of PNF MA 13 (Forest Service 2003a),” is cited using a 2003 reference (17 years out of date). Per the National Forest Management Act and ROS, the FS is required to provide recreation opportunities. As Idaho is currently the fastest growing state in the nation since 2016 and it is noted that current and inbound residents value recreation highly (a motivating factor in their move to this state) ([census.gov](https://www.census.gov), 2020; Foy, 2020; Raphelson, 2017; Men’s Journal, 2019), please include and disclose more recent resources for recreation use analysis of this area in a supplemental DEIS in order to inform substantial and informed comments.

a. FURTHER related to more recent data being taken into account is this:

- Recreation is Idaho's outdoor recreation economy generates \$7.8 billion in consumer spending and support 78,000 jobs
- 79% of Idaho’s residents participate in outdoor recreation
- Our outdoors are a recruitment tool for businesses used to attract and retain workers
- Areas in the West with protected wilderness, national parks and recreational assets have higher growth rate and higher per-capita income
- Medical savings and improved physical and mental health are associated with outdoor lifestyles

(Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020)

4. Similarly to the above, cited on page 615 uses sources cited from 2003-2010, which are inadequate and out of date, especially in the context of Idaho's growing population, recreation interests, and general economic benefits to local Idaho citizens ([census.gov](https://www.census.gov), 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please provide more up to date information and analysis. "Recreation users in the analysis area are mostly locals, originating from areas in the analysis area such as Yellow Pine, Warm Lake, Big Creek/Edwardsburg, and areas just west of the analysis area including Cascade and Long Valley (Forest Service 2010).

Users particularly in the western portion of the analysis area also are from populated areas further south including Treasure Valley and Boise (Forest Service 2010). As noted in the Payette Forest Plan for PNF MA 13, though most use is local, "users come through the area from all over the country to use the adjacent Wilderness [FCRNRW], especially during big-game hunting seasons" (Forest Service 2003a)." This section further presents information that needs clarification. Cited local areas such as recreationists being mostly local, but also from the Treasure Valley, Boise, and from all over the country, what effect will the Stibnite project have on these local, Treasure Valley/ Boise/ other Idaho, national and even international visitor's uses? There is no information on impact to visitors or the local tourism economies that depend upon Them.

5. The purpose of the Valley County Comprehensive Plan is to promote the health, safety, and general welfare of the people of the state of Idaho, and in part, to ensure the protection of "fish, wildlife, and recreation resources" (Valley County 2018). The Valley County Comprehensive Plan also includes a Recreation and Open Space goal "To promote and support a viable recreation and tourism program ..." (Valley County 2018). Objectives include creating improvements for more varied recreation opportunities, promoting development of new recreation facilities when compatible with land use goals, and protecting access to public lands (Valley County 2018).

a. Note of this law denotes local work and law to protect recreation resources in Valley County. Again, the current DEIS does not provide information on how recreation in the area will be impacted and provides out of date sources on current use.

b. Please provide information on impact including economic impacts to these local economies that rely on tourists, per EIS requirements.

c. Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most

recent 2-3 years.

4. Forest Service Commitment to Best Available Science

These stand out in the guiding Principles of the United States Forest Service:

- We use the best scientific knowledge in making decisions and select the most appropriate technologies in the management of resources. This report does not include the best scientific knowledge and therefore is insufficient for comment.

This SDEIS and the DEIS do not use the best scientific knowledge and needs to be updated as such.

Thank you for the consideration. Please provide more time for review of specifics and extend the public comment period and do NOT approve the Stibnite Gold Mine.

Thank you!

Sincerely,
Kira Tenney