January 10, 2023

Ms. Linda Jackson

Forest Supervisor

Payette National Forest

McCall, Idaho 83638

Ms. Jackson:

I am writing this letter to comment on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS), as provided for in the National Environmental Policy Act (NEPA). I am a resident of McCall, Idaho, and an avid outdoor recreationist. I feel lucky to be able to live in Valley County and take advantage of the many nearby recreational opportunities available. Much of this recreation takes place on the Payette and Boise National Forests, which I appreciate very much. I am also a retired Natural Resource Specialist, having worked for the National Park Service, the Bureau of Land Management, and the Bureau of Reclamation.

I am concerned about the potential adverse environmental impacts that would accompany the proposed Stibnite Gold Project (SGP) as analyzed in the SDEIS. Thus, I offer the following comments on the SDEIS.

## Alternatives

The range of alternatives considered in the SDEIS is insufficient because under NEPA regulations, “reasonable alternatives mean a reasonable range of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action.” NEPA requires the USFS to “…. Rigorously explore and objectively evaluate all reasonable alternatives……” 40 CFR § 1502.14(a).

The Mine Plan is the same for both Action Alternatives, the only difference being the route of the access road. The Forest Service needs to consider viable, robust alternatives that:

1. Reduce the massive project footprint
2. Completely avoid impacts to wetlands
3. Include the complete backfilling of all mine pits
4. Fully comply with current Boise NF and Payette NF Plans.

## Access and Transportation

Why wasn’t Hwy 55, through Boise, McCall, and New Meadows, nor Hwy 95 north or south, considered in any transportation analysis? Risks of spills and exposure to hazardous materials extend from the origin of the reagents to the mine, and from the mine to the destination of the wastes taken away.

The SDEIS indicates that one potential transportation impact (issue) is that the SGP may affect public safety on the roads used by mine vehicles during construction, operation, and closure activities. The indicator for this issue is the number of SGP-related vehicles trips on public roads. However, public roads north and south of Cascade and the miles traveled on those roads have not been addressed in the SDEIS.

Additionally, the SDEIS fails to analyze access and transportation impacts from increased traffic directly related to the mine and from increased traffic indirectly caused by the SGP. This would include traffic created by mine employees and their families as they travel local roads and regional highways. As part of the Forest Service’s “hard look’ at cumulative impacts, the Reasonably Foreseeable Future Action of increased traffic volume in Valley County (recreational and other) must be considered. This increasing traffic volume and associated noise and traffic accidents have already been affecting the residents of and visitors to Valley County. The increased traffic created by the SGP would be cumulative to these effects. Such cumulative impacts are not analyzed in the SDEIS.

## Wilderness

The SGP is located in close proximity to the Frank Church – River of No Return Wilderness. This is one of the largest and most important federally-designated wilderness areas in the lower 48 states. In my opinion, it is truly one of Idaho’s gems and worthy of the protection given it by its designation as a Wilderness Area. Over a mile of the Burntlog Road accessing the SGP would directly border the Wilderness Area. The construction, operation, maintenance, and traffic of this road would:

* degrade the Wilderness Area with noise and light
* fragment wildlife habitat and disrupt wildlife corridors
* increase the opportunity and potential for illegal incursions into the Wilderness Area

Under the Preferred Alternative, these impacts would occur for 26 years from initial disturbance to initiation of final reclamation of the Burntlog Road. These major detrimental impacts to one of Idaho’s gems are unacceptable. The Burntlog Road should not be constructed.

## Social and Economic Conditions

As a former resident of a mining town, Battle Mountain, Nevada, I am very concerned about the many potential adverse social and economic impacts of mining projects, particularly the proposed SGP. I have reviewed *An Evaluation of the Potential Socio-Economic Impacts of the Proposed Stibnite Mine on Valley County, Idaho (December 2022).* This study, funded by the Idaho Headwaters Study Group and prepared by Power Consulting (Missoula, MT) points up several the likely detrimental effects of the SGP:

* Mine operations would create additional burdens on city and county services, such as schools, roads, police, fire department, hospitals and telecommunications facilities that wouild not be offset by the estimated $300,000 that would be paid by Perpetua in annual property taxes.
* Rather than making local purchases supporting Valley County businesses, Perpetua will likely attempt to minimize their costs and secure supply chains from regional or national sources.
* Valley County's housing market would become increasingly less affordable for the local residents if the mine is built.
* The Valley County economic benefit from SGP mine employment would be almost completely negated by a slight 2% decline in the visitor-recreation and non-labor income sectors that could result from the degradation of natural resources by the SGP.

These social and economic impacts of the proposed SGP were not adequately analyzed in the SDEIS.

Please enter my comments into the project record and address these oversights and weaknesses of the SDEIS. At the very least, the proposed SGP project needs to be redesigned to minimize these and other adverse environmental impacts. A better choice would be to stop the project entirely and work towards complete restoration of the site. Nobody wants to live in a mining town.

Sincerely,

Mike Wissenbach

McCall, Idaho