

To Whom It May Concern:

My name is Meg FitzMaurice. I live in Valley County outside McCall. I am born and raised in Idaho. I am writing to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) in regards to the proposed Stibnite Mine Project (SMP). The SDEIS similar to the DEIS submitted in August 2020, is inadequate in its content and thorough review of the impacts of the SMP.

It is 9:00 pm on January 10, 2023 and I am sitting down to formulate my thoughts. This comment is due in 3 hours. While I take full responsibility for my procrastination at this point, the time frame and duration set for the comment period was a limiting factor. A 75 day period to which coincided with 3 major holidays Thanksgiving, Christmas and New Years created significant barriers. This restricted the thorough review, engagement and analysis of a document that is extensive in length, technical language and detail. As an entity the USFS has the responsibility to ensure a proposal of this magnitude receives the public engagement, inspection and scrutiny it requires. This fraction of time is insufficient for such a complex project and portrays a lack of these ideals.

The question I have asked myself over the last couple years is what is meant to be gained from SMP and more importantly what is lost? I work as a healthcare provider and often when creating a plan with a patient I like to lay out the risk vs. benefits of a plan in order to come to an informed decision with the patient. In utilizing what I know I have taken the same approach when analyzing the SMP. It is in my opinion that the risk and loss associated with SMP far outweigh the gains. The gains largely monetary will benefit few and will be short-term. The losses however will affect innumerable entities and will be extensive, long term and in some cases in “perpetuity.” These include detrimental impacts to our local and prestigious watersheds, fish, wildlife, tribal and treaty rights, soil and vegetation, air and water quality to name a few. Not to mention the impacts on recreation, public health as well as transportation and hazardous material risk to our local communities associated with an enormous open pit, cyanide-leaching gold mine.

Perpetua Resource Co. has long advertised their intent to “restore” the old Stibnite mining site as part of their efforts. Perpetua advertises on their website “our project is designed to restore the environment.” It should be noted that while SMP will in part be located at the old Stibnite mining site over half of the SMP will take place on previously undisturbed lands, the majority of which are public lands administered by the National Forest. If Perpetua’s intent with SGM is truly to restore the area then:

- 1) Why does it violate the Payette and Boise Land Resource Management Plans?
Why does the USFS need to significantly amend the Forest Plan to allow for long term and indefinite degradation of resources, aquatic and wildlife?
- 2) Why does it violate the Clean Water Act?
- 3) Why does it violate the Endangered Species Act?
- 4) Why does it conflict with established Treaty and Tribal Rights?
- 5) Why does the SDEIS lack detailed reclamation plans or analysis of the effectiveness of the limited proposed mitigation measures?

It is clear that SGP will create unavoidable and irreversible environmental, social, and economic risks, many of which are not addressed, lack information and/or a detailed review in the SDEIS. The USFS is required through the NEPA (National Environmental Policy Act) to stand behind the information provided in the SDEIS as accurate and complete. Is the USFS willing to stand behind the accuracy and completeness of this document? I would not.

In conclusion, the risks and negative impacts associated with the SGP far outweigh the benefits. As a provider I would strongly encourage a patient to take these into account and either stop or come up with an alternative plan that is individualized and evidence based in order to mitigate risk. In this case, the plan-the SDEIS falls short and is deficient in so many ways that it can not be used as a basis to move forward or make a decision in regards to the SGP. Given this, I support the No Action Alternative. If an alternative must be reached it should be done through a re-evaluation of the proposal requiring missing documentation, in depth mitigation evaluation and planning and risk stratification. It's best practice and it's the job of the USFS as stewards of our public lands.

Thank you for your time and consideration.