[Stibnite Gold Project EIS #50516](https://cara.fs2c.usda.gov/Public/CommentInput?Project=50516)

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 Stibnite Gold Project

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**Stibnite Gold Project SDEIS Comments**

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I have called Adams and Valley counties my home since 1995. I am a retired educator, and my husband is a retired forester; so through osmosis I am marginally familiar with the NEPA process, EIS’s, the ESA, and forest management plans. My children were raised here. We and our friends and neighbors depend on this area’s clean air and water. I hike, snowshoe, raft, kayak, ski, swim and climb here. Every day I am grateful to live in this peaceful and beautiful place.

As an Idaho Master Naturalist I am engaged in citizen science, conservation education, habitat stewardship and public education projects. Year round I help conduct surveys of wildlife, collect seeds, participate in cleanup activities, and lead workshops. I am always learning.

Mining for gold and antimony at Stibnite, as Perpetua proposes, will impact me personally, my community, and the wild lands I love. There appear to be many weaknesses with the SDEIS including: the handling and transportation of construction materials and toxic waste to and from the mine site along roads and major highways that run alongside sensitive waterways. The claims regarding the efficacy of untested fish tunnels; the effects of changing water temperatures on sensitive fish species; the timeframes for stream restoration and streamside reclamation and regeneration are overstated and problematic.

There are other irregularities in the DSEIS. The four amendments to the forest plan (SDEIS Appendix A) run counter to conservation and forest health objectives. This is a concern. In the SDEIS, the proposed amendments are justified because they “meet the outstanding rights of mining.” The plan states that these amendments are acceptable because the mining events are limited to the life of the Stibnite project (identified as 20 years) and will cause only temporary and reversible degradation of aquatic, terrestrial, and watershed conditions in the areas affected by the project*.* These assertions are questionable.

I have questions concerning the transportation of materials and waste. The northerly route coming through McCall requires analysis and identification of impacts. There will be 20 years of continuous traffic impacts through this corridor which should not have been ignored. The estimated spill rate per truck mile in the SGP SDEIS was 100 times lower than would normally be calculated because the estimated number of miles traveled only assumed those miles are from the State Highway 55/Warm Lake Road junction. Why are there no project-specific spill risk calculations for numbers of spills, and spill probability, in the SDEIS? (SDEIS **4-345)**

According to SDEIS 5-34 risks extend “from the origin of the reagents, to the mine, and to the destination of the wastes taken away.”

 Study needs to be directed to transportation and traffic safety concerns, particularly as they pertain to our sensitive waterways along Hwy 55 and Hwy 95, Idaho’s major north-south corridors and their connecting roads. Approximately one-third of all mine-related traffic originating north of Warm Lake Road would use State Highway 55 through the communities of Donnelly, Lake Fork, and McCall. Through McCall, mine-related traffic would generally use Deinhard Lane and Boydstun Street, passing through a residential area along Boydstun and then through residential/commercial/industrial property along Deinhard. The route contains a shared bike/pedestrian pathway system with multiple modes of users on the roadway. There is an “s” turn that is dangerous in the winter with multiple slide-offs and accidents due to winter weather conditions. The Highway 55 intersections of this roadway, on the south at Deinhard and on the north at Boydstun, were identified in the applicant’s Traffic Impact Study submitted to Idaho Transportation Department and Valley County as recently as September 2020 as needing safety improvements to accommodate the turning geometry of their large vehicles. These concerns are not addresses in the DSEIS.

The SDEIS is deficient and the USFS has a clear obligation to go back and try again. It is time to choose the No-Action alternative.