

Thank you for your time and consideration for Valley County and the opportunity to make a Public Comment about the Stibnite Gold Project. My comments below are in regard of the SGP Supplemental Draft Environmental Impact Statement (SDEIS; Oct. 2022).

I was raised in McCall and have referred to it as home for the past 29 years. Throughout that time, I have used the Warm Lake Road and areas around Yellowpine, Stibnite, and Big Creek for year-round recreational access - fishing, hunting, biking and skiing. I received a BS in Chemistry from the College of Idaho, a MSc in Environmental Science (ETH Zurich) with an emphasis on health impacts from large industrial projects in rural communities, and will graduate with my MD from the University of Washington School of Medicine in May of 2023. I plan to practice medicine in and surrounding Valley County; the Stibnite Project will have direct public health effects on my potential patient population, as well as my personal health as I plan to continue recreating in the area and surrounding drainage basins.

For educational purposes, I have worked with a research group that collaborates with the World Health Organization to oversee health impacts of large-scale mining projects in Sub-Saharan Africa and have reviewed over 300 EIS Reports in regard to health impacts of industrial mining. Based on my personal background, I do not believe that the Stibnite SDEIS has adequately factored in the potential health impacts of proposed mining infrastructure. The current project proposal presents undue risk hazards for Perpetua employees, Federal Employees, and the general public.

### **1.0 Inappropriate Response of Public Comments from Previous Proposals**

Renditions of the Stibnite Gold Mine (SGM) Project have been discussed in Valley County for over a decade. In 2020, I submitted a personal comment for the DEIS, with questions particular to sections disclosed in that document. I never received a response in any kind from the Forest Service prior to the Preferred Alternative proposed by Perpetua (2022). Mine is amongst thousands of public comments that brought forward concerns. To me, this process lacks transparency and diminishes the direct impacts known to the public at this time. My understanding of the NEPA process is limited, but I understand it to be a review process during which the Forest Service and Federal Administration prioritize and acknowledge concerns rather than a private agency determining the appropriate interpretation and response. At this time, as my own concerns have not been addressed, it appears that the SGM has limited public review and is being pushed forward with undue risk and potential to harm without proper NEPA protocol.

**COMMENT: Prior comments have not been adequately responded to by the US Forest Service in regard to public concern for the proposed Stibnite Gold Mine Project.**

*Please note, my comments for the 2020 DEIS were also submitted at this time.*

### **1.1 Inadequate Time for New Proposal Review**

The 75 day comment period was an inadequate time frame to review the SDEIS. Release of the SDEIS was not predictable and the document released was long, dense, and difficult to interpret. In addition, my comments had not been specifically addressed, so it was hard to determine if my previous concerns had been addressed. The presentation of data and different tables between the DEIS (2020) and the SDEIS (2022) made it very impossible to compare values and changes in operational planning. In addition, many of the tables reference Idaho DEQ PTC values, which were another set of tables to review. This presentation is not clear enough to be interpreted by the general public. On further review, I could not find a similar mining operation in the US that had a cooperative gold and antimony mineral processing facility. With such a unique opportunity, I feel that the best possible operation should be prioritized for this project. Thousands of public comments requested an extension of the comment period; these were not responded to.

**COMMENT: A 75-day period is inadequate for a mining operation of substantial size and incomparable project operation.**

## **2.0 Unsafe/Unpredictable Contaminant Values in Water, Air and Soil Quality**

In many of the courses that I have taken, calculations for Chemicals of Concern have had somewhat standardized calculations, with a range/ standard deviation in predictive values. The MMP 2021 Water Chemistry Tables Tables 4.9-12 through 15 and 18 through 20 show predicted concentrations of various metals and other chemicals in West End, Midnight, Hangar Flats, and Yellow Pine Pits and Pit Lakes extrapolated out to 100 or 112 mine years. Interestingly, most sites also are projected to have no remaining toxins after 'mine-year' 40. I question the accuracy of these calculations, especially as comments elsewhere in the SDEIS indicate that there will be continued levels of contamination. The current predominant toxins currently are arsenic, antimony, and mercury.

I understand that these calculations are based on a modeled program in which the mine-pits no longer release water after the operation of the mine (year 40). However, in most standardized equations, there is an 'uncertainty variable' that accounts for errors, leaks, changes in time/operation and reaccumulation of contaminants in downstream areas. Often, there is also a model outlier that discloses potential events from a natural disaster, such as an earthquake or avalanche, which happen frequently in central Idaho.

The Preferred Alternative evaluated by the Forest Service relies on SGP assertions that Perpetua will adhere to the 2021 MMP, with an assertion that it will operate at 29% capacity. Perpetua has a PTC to construct a facility capable of operating at 180,000 tons/day capacity and an amendable permit condition limiting production to 135,000 ton/day (75% of capacity), There are no provisions in the PTC permit conditions to limit SGP to the Forest Service assumed production level. IDEQ permit conditions allow production up to the 75% of capacity TRACT limit, and is amendable without federal oversight.

**COMMENT: Please provide calculations used for modeling outcomes in addition to modeling factors of uncertainty as well as projection of values at the pump facility operating at 75% vs 29%.**

The soil contaminant (most notably for arsenic, antimony and mercury) values outlined in the SDEIS are significantly different from those in the DEIS. My biggest concern is with arsenic. Arsenic is a known carcinogen. In disturbing any of the soil at these sites, arsenic will be a notable component of the dust generated. This dust generated will not only be an air contaminant, but the silt will travel in stream beds. Onsite roadbeds will have this dust, which will be tracked along transport areas. Additional issues will be present with attempted dust suppression methods, using oil or water, and even road salt and gravel (Ice) as arsenic compounds are likely to form. I believe that the calculation presented underestimates the amount of arsenic contamination that will be present.

**Arsenic, antimony and mercury have known health risks, including having carcinogenic properties. The Forest Service should independently perform the emission calculations, air quality modeling, and risk assessment associated with arsenic, mercury and antimony contamination, as I do not believe that current estimates are accurate. These values need to be published and available to the public, especially along recreational corridors. Soil cleanup criteria should meet CERCLA guidelines**

### **3.0 Transport and Traffic Volume**

Traffic along the Warm Lake Highway, north of Cascade is currently used by residents of the area and for recreational activities. Recreational activities are a primary economic income for the entire region of Valley County. Additionally, proposed transport routes along highway 55, both north and south, are along river corridors. Below are several quotes from the SDEIS:

“Current access roads used for the transport of hazardous materials to the mine site include Warm Lake Road (CR 10-579) from Cascade, continuing to Landmark and then on Johnson Creek Road (CR 10-413) to the village of Yellow Pine and Stibnite Road (CR 50-412) to the mine site.” (P. 3-99). “The estimated annual average traffic to the SGLF and from the SGLF to the SGP during mining and ore processing operations is also provided in Table 2.4-2. Supplies and deliveries for the SGP during operations would access the SGLF using SH 55 to Warm Lake Road. Approximately two-thirds of all mine-related traffic would originate south of Warm Lake Road and would use SH 55 through Cascade and other communities along SH 55 south of Cascade including Smith’s Ferry, Banks and Horseshoe Bend. 8 Approximately one-third of all mine-related traffic originating north of Warm Lake Road would use SH 55 through the communities of Donnelly, Lake Fork, McCall, and New Meadows”, (P. 2-22). “In the event a release was to occur, it would likely be relatively small in volume based on estimated container volumes and would be addressed promptly as per the SPCC Plan and Spill Response Plan. The SPCC Plan would address site-specific spill prevention measures, fuel haul guidelines, fuel unloading procedures, inspections, secondary containment of all on-site fuel storage tanks, and staff training.” “In the event that large quantities of hazardous materials are spilled into the

environment from a transportation incident, or in the event that a spill is not immediately discovered or addressed, the impact could be more substantial.” (P. 4-522).

The SDEIS focuses on the transport section from Cascade/McCall to the Stibnite Gold Project, with stated preference for the Burnt Log Route. While there is an emergency plan discussed, it is relatively vague. Large sections of this route do not have cellphone service and satellite communication is also difficult due to the nature of the geography. The proposed routes exist along known avalanche corridors. As year-round transport is planned, road maintenance and construction needs to have a consistent routine for risk reduction and consistent means of communication. Emergency response responsibility for this section was not clearly outlined.

**Current resources in Cascade are not adequate for a response and an incident along the route would deplete what is available for community members, i.e. ambulances, firetrucks and responders. I suggest having stations in the Warm Lake Meadows, at Yellow Pine, and the Stibnite site that could adequately respond to a mass casualty accident with potential fire involvement.**

The corridor of HW 55 also has limited cell phone service and satellite outreach is often distorted due to the canyon. These roads lie along rivers that are heavily used for recreation and irrigation. **There is no clear outline for emergency Perpetua trucking events along the highway 55 corridor. There is greatly increasing traffic along this roadway and a response plan is needed.**

A significant increase in traffic is also anticipated. **For all road sections, it was unclear if/how Perpetua would be contributing for the burden of increased heavy truck traffic along any of the roadways they will be using.**

#### **4.0 Further Exploration**

Several sites at the Stibnite Mine are discussed to be available for further exploration. While the initial project and permitting process is published in the context of a 40-year operation, the proposal for further exploration does not have a clear outline. This discussion is vague and communication about the potential time extension of mining in the area is not appropriately disclosed.

#### **5.0 Allocated Cleanup Costs and Timeline**

For several decades, the Stibnite site has had different rehabilitation efforts. Thousands of tax-payer dollars have already been spent in attempts to ‘clean’ this site. Contaminants, particularly arsenic, in this region are above recommended environmental exposure thresholds CDC. While it is incredibly hopeful that Perpetua will clean this site in its efforts, it is not guaranteed. Under current Idaho policy, mining companies are able to claim credit for potential respiration costs. Due to the complexity and extensive history at this site, this is inappropriate. At least 50% of the potential respiration costs for this operation should be in capital bonds. In addition, the site (as previously proposed) should be an official CERCLA site with federal funding and efforts to have an adequate, appropriate, and long-lasting reclamation.

## **6.0 Summary**

In summary, the SDEIS for the proposed Stibnite Gold Project presents significant risks in the context of human health.

I request that the Forest Service responds to my comment to acknowledge the importance of these potential effects on the communities and recreationalists in the surrounding area.

I do not support the Preferred Alternative, but instead urge the agency to have a NO Action Alternative. In addition, The Stibnite Mine Site should be officially declared a CERCLA (Superfund) site for future reclamation efforts.

Sincerely,  
Ruth Lewinski