

January 9, 2023

Ms. Linda Jackson, Forest Supervisor
Attn: Stibnite Mine DSEIS
Payette National Forest
500 Mission St, Building #2
McCall ID 83638

Dear Ms. Jackson:

These comments are submitted to the US Forest Service on the Draft Supplemental Environmental Impact Statement for the Perpetua Project at Stibnite on the Payette National Forest pursuant to the National Environmental Policy Act of 1969, as amended (P.L. 91-190, 42 U.S.C. 4321-4347); and the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508).

Comment Extension. Thank you for the review opportunity. More time is needed. The size and extent of the SDEIS, its multiple appendices, the numerous supporting documents on the project website and elsewhere including other agencies' review documents, and the extensive problems needing commenting, all are reasons for a further extension. I request another 45-day extension, to allow 120 days for more adequate time for a quality review of this large and impactful project and its thousands of pages of documentation, consistent with the intent of the National Environmental Policy Act, and the NEPA Regulations (40 CFR 1503.1). Agencies and the public need adequate time to be able to not only to review, but also to prepare informed and intelligent comments.

This is a large and destructive project. Components of the proposed project are too numerous to list here. Main ones include open mine pits; ore processing facilities; development rock storage facilities; tailings storage facility; a water treatment facility; access and haul roads; electrical transmission lines; a stream tunnel; miles of new haul roads; and multiple other support facilities. Negative environmental effects are extensive and excessive. The potentially affected area for the proposed project includes approximately 3,500 acres on federal, state, and private lands located in Valley County, Idaho. It involves NFS lands on the National Forests. It is an expansive and complicated project superimposed over a large and complex landscape with long histories and multiple unsolved problems.

I provided comments on the DEIS for this project on October 26, 2020 in a 10-page letter mailed by US Postal Service on that date. I will not repeat them here, but to the extent pertinent to the DSEIS the FEIS upcoming, incorporate those comment on the 10 pages by reference.

MAJOR PROJECT IMPACTS OF CRITICAL CONCERN

The Modified Stibnite Gold Project, as designed by Perpetua Resources formerly named Midas Gold, would have major landscape-altering features.

Major Increase In Land Disturbance. The Proposed Project (Operation Area) boundary would total 3,267 acres and would nearly double the footprint of the existing area of mining

disturbance. It would move about 100 million tons of mining waste materials and deposit it behind a new 400 foot tall tailings dam. This massive tailings mass would permanently alter the natural scenery and create its own environmental risks in the long-term.

Water and Fisheries Degradation. For mine site operations, the Proposed Project would use up to 20% of the water in a stretch of the East Fork South Fork Salmon River that supports endangered salmon, steelhead, and bull trout habitat. This will have major adverse effects on those three populations threaten to extinguish them permanently from that area, and contribute to cumulative effects of possible species extinction. This is unacceptable. The re-establishment of the East Fork Salmon River through the disturbed area associated with Sibnite's Yellow Pine Pit will significantly increase stream temperatures, making it unsuitable for bull trout, which will disappear from the river here, and making it less suitable for chinook salmon and steelhead.

Hazardous Chemicals. The Proposed Project would transport over nine million gallons of hazardous fuels, chemicals, and lubricants through river corridors and sensitive headwaters streams annually. The substantial risk of accidental spills of these hazardous liquids and chemicals will pose serious danger to human health and safety, fish and fish habitat, and wildlife and fish habitat. Polluted and poisonous waters become a real possibility given the challenging environmental including bad roads, bad weather, and bad drivers. This is unacceptable.

Roadless Areas. For mine construction, the Proposed Project would need to construct 15 miles of new roads within designated roadless areas. This is unacceptable. Roadless Areas are needed reserves from future overdevelopment of the National Forest, and a potential supply of future Wilderness as future demand continues to increase. Every effort should be made by the Forest Service to limit the destruction of Roadless Area acres to the minimum needed to meet the limited requirements of the 1972 General Mining Law.

Forest Plan Protections Dropped. The Proposed Project would need to make multiple Amendments to the Payette and Boise National Forest Plans to allow the Agency to waive important safeguards for the land and waters of the Stibnite area and set a precedent weakening all Plan protective measures. This is unacceptable. The Forest Plans' Standard and Guidelines are the product of decades of laborious public review and comment, give-and-take, and balancing of uses and interests. They implement the Forest Plans' Goals and Objective at the Forest or M.A. level. There are long-standing reasons for each of them. None should be amended casually just to allow one Project to be constructed and operated. They should not be amended unless there is no other environmentally preferable option or alternative available to meet the limited requirements of the archaic 1872 General Mining Law. Amending them should not become a precedent for the Forest to cite in further ignoring its own Standards and Guidelines, those or other ones, on the Forest in the future. The DSEIS needs to upgrade the justification for each of the Forest Plan amendments it proposes. But first, the Forest Service needs to take a good hard look at reducing the number of amendments by adjusting the Alternatives to conform with the Plan Standards and Guidelines and land allocations. This is especially justified in one of the most environmentally critical and sensitive areas of the Payette NF that has intense public interest and scrutiny.

ADVERSE EFFECTS NEEDING FURTHER REDUCTION

1. Geology. Chapter 4 notes the Proposed Project would "...increase the potential risk of damage, injury, and loss of life from the existing avalanche hazards. Blasting associated with mine operations could trigger avalanches in the vicinity of the mine operations." P. 4-14. And: "There would be potential for localized, temporary, and major impacts from infrequent large avalanches." (P. 4-16.)

However, "At this time, no mitigation measures have been identified for Geologic Resources and Geotechnical Hazards." P. 4-21.

This is a non-sequitur. If the Proposed Project will increase potential for "major impacts" and "loss of life" from some blasting and avalanches, why is that tolerated by the Forest Service without requiring mitigation measures for this resource element to safeguard human life and safety?

2. Climate Change. The analysis cursorily dismisses Climate Change (Section 4.4.2.2), concluding in effect: 'How can GHG emissions be specifically mitigated for in the action alternatives? They cannot.' The Proponent chooses not to mitigate for greenhouse gas emissions in Chapter 2 or 4, "given the lack of a regulatory framework for managing and permitting GHG sources." P. 4-63. And:

"Although reasonable estimates for GHG emissions may be derived for a specific activity, there is uncertainty in evaluating longer-term emissions levels and the relationship between GHG sources and sinks over a lengthy and uncertain timeframe. Because climate change effects resulting from GHG emissions are global in scale, there is no reliable way to quantify whether or to what extent local GHG emissions contribute to observed regional trends, or the larger global phenomenon. Therefore, meaningful connection of the 2021 MMP GHG emissions to climate change effects at the state, regional, or global level cannot be provided." P. 4-64.

This is one of the weakest excuses for inaction. It overlooks the principles of incremental cumulative effects. It assumes all analyses must be quantitative, not qualitative. It assumes that every action worth taking needs to have a quantified target or limit. If every entity in this country adopted this line, nothing would get done to slow climate change in America. Washing their hands by the Proponent and the Forest Service of the question because of difficulty in addressing it quantifiably is ridiculous, takes the easy way out, is not environmentally responsible any more, and is unacceptable. It needs to be deleted entirely from the SDEIS and replaced with a balanced discussion.

So based on this faulty reasoning, there are zero specific mitigation measures for Climate Change in Chapter 2 or 4 for this project. This is difficult to believe, and reflects poorly on the local, regional, national, and global interests of Perpetua, as well and responsibility of the Forest Service, to limit or minimize greenhouse gas production beyond the bare minimum required. The absence of laws regulations or standards requiring an environmental benefit does not justify failure to take responsible action, which multiple nations have taken and this nation has begun to take specifically to reduce greenhouse gas emissions and slow climate change.

Continuing, Chapter 4 then stretches beyond the flimsy excuse to a biased claim, that the project will actually help reduce climate change impacts:

“These improvements in the long-term productivity of the SGP may help to reduce the severity of climate change impacts resulting from warmer temperatures, variable precipitation, decreased snowpack, lower stream flows, warmer stream temperatures, and changes in wildfire patterns.” P. 4-74.

So... the Stibnite Project--which the SDEIS admits will cause warmer local temperatures, decreased snowpack, lower stream flows, and warmer stream temperatures--will actually “reduce the severity of climate change impacts.” This is self-contradictory, and also needs to be deleted entirely from the SDEIS.

The Proposed Action needs to add measures to substantially reduce release of GHG emissions caused both by mine development and operation. The Forest Service needs to drop Perpetua’s Chapter 2 and Chapter 4 lip service treatment of Climate Change, and instruct Perpetua to go back to the drawing board and develop a stand-alone plan for addressing Climate Change and minimize the Project’s GHG production that contribute to climate change.

3. Fish and Habitat Loss. The two SDEIS alternatives would inflict some of their greatest adverse impact on fish, and particularly threatened and endangered fish species: Chinook salmon, steelhead, and bull trout. These are barely hanging on to existence in these headwaters of the South Fork Salmon River watershed. “The 2021 MMP would have direct permanent impacts on water quality, as it would contribute new sources of mine waste material to the East Fork SFSR drainage.” (SDEIS ES-18). And then, “Post-closure, a net decrease in quality and quantity of bull trout habitat would occur despite removal of passage barriers and an increase of lake habitat for bull trout...” (Fisheries Specialist Report, p. 150). Predicted stream temperatures would be elevated above existing baseline conditions for up to 100 years, until vegetation can provide shade (SDIES ES-15). This timeline is far too long and may result in permanent extirpation of temperature sensitive species from the project area. And baseline conditions represent the current degraded aquatic condition here after a century of degradation from mining. True restoration would go beyond the current and regain conditions before mining.

The Proposed Project will cause temporary or permanent displacement of chinook salmon from the project area (SDEIS ES-19) due to habitat conditions reaching unsuitable conditions. An estimated 20% of the remaining Critical Habitat for Chinook and bull trout will be destroyed. Meadow Creek’s low flow discharge will be dropped dangerously low. Summer stream temperatures would sharply increase. This has ripple effects down the South Fork, down the Salmon, down the Snake, down the Columbia, and into the Pacific Ocean and the Northwest. The DEIS did not and the DSEIS does not adequately capture the full extent of adverse cumulative effects. Here in the Pacific Northwest, the resident Orca (killer whale) population is critically endangered, just dozens remaining, dying off because of loss of its predominant food source, the Chinook salmon. These are adverse cumulative effects which are well known. And yet the documents failed to disclose these far-reaching cumulative effects on salmon, or the contribution of the Perpetua Mine project to these cumulative effects. The project will not help recover its local Chinook population, it will degrade it further. This promises to contribute to the extinction of the Chinook salmon in Idaho, and the DSEIS is deficient in disclosing this. It fails to include adequate mitigation measures to reverse the stream channel losses, fish barriers,

pollution, sedimentation, and water temperature warming caused by the proposed mining. It fails to help restore the struggling Chinook populations. The Project needs to.

4. Net Effects of Over-Optimistic Mitigation Success. The Regulatory Requirements and the Forest Plan Requirements listed on Page 2.4.9 and Table 2.4-12 list numerous “Could Do” measures, “Should Do” measures, in addition to the more mandatory “Shall Do” measures. The reality is that only the “Shall Do” measures are likely to be implemented. The “Would Do” would only be implemented if certain conditions are met or not met. The “Should Do” items are basically wishes, and therefore optional. Therefore, Chapter 4 Consequences cannot assume that all Measures in all three categories will actually be implemented. It has to disclose which it assumes will occur, which it assumes will not, and which it is uncertain about. Otherwise, the Consequences analysis will be heavily slanted toward minimization of adverse effects. Therefore, the suite of mitigation measures proposed have a very high risk of very low success. The consequences to aquatic and fisheries will be at high risk of being catastrophic. The DSEIS analysis needs to better reflect probability of success in estimation of effects of mitigations.

5. Polluted Air. The Perpetua mine project will be a massive polluter of the air for much of its 25 year lifespan. Fugitive dust is an inevitable byproduct of mining and reclamation on this large scale. Health and safety of mine workers and Forest Service and other agency employees will be jeopardized. The DEIS incompletely and superficially addressed air quality and the site-specific environmental adverse impacts on humans, fish and wildlife individuals and populations, and vegetation in and around the Perpetua mining area, both direct, and indirect as well as cumulative effects. The SDEIS needs to disclose specifics of deleterious impacts.

6. Lost Public Access. The DEIS was not and the DSEIS is not clear and specific on whether and to what degree the general public will lose, or have continued access to, NFS lands and other public lands within the project area during project development, operation, and reclamation, particularly by season. The visiting, recreating, and business public will lose access to the Stibnite area for decades while the project plays out. It will have current access through Stibnite to Thunder Mountain blocked during mine activities. As one mitigation, the DEIS Alternative 2 allowed a through-road to remain open through the mining complex from Yellow Pine to Thunder Mountain summit. But will this road be open year-round? In winter, will it be a wheeled vehicle road, or snowmobile route? And what entity will be responsible for the upkeep, maintenance, repair, replacement of this road, and its associated lateral and downstream damages to the environment? Midas? Valley County? The Forest Service? FHA? And on the new Burnt Log mine access road, what sort of public traffic restrictions will be imposed to provide allowance for heavy mining truck traffic? The SDEIS needs to disclose specifics.

7. Electrical Transmission Line. The Perpetua Alternative 2 will add Water Treatment Plants that will require a new and upgraded transmission line into the mine complex from the Johnson Creek substation. The line will require maintenance in a remote, mountainous, high elevation area of burned and falling snags. Winter snowpack in harsh conditions will exacerbate the problem and its costs. Who will patrol and monitor the new line? Who will pay the predictable costs of maintenance and repair? For future replacement?

8. Degraded Recreation Opportunities. The DEIS was not and the DSEIS is not clear and specific on whether and to what degree the general public will retain or lose recreation opportunities on NFS lands within the project area during project development, operation, and reclamation, particularly by season. This includes harvest and collection of forest products. It particularly is deficient in disclosing the degradation of the diverse recreation experiences in the project area and the surrounding area, caused by sights (visual quality degradation) noise intrusion, smoke and dust, reduction in air quality, reduction in visibility, loss of solitude, and opportunities for primitive recreation in the nearby Frank Church-River of No Return Wilderness, and destruction of potential wilderness characteristics in four roadless areas including two most adversely affected, Meadow Creek and Burntlog Roadless Areas. In fact, the Proposed Action would develop part of the Burntlog Roadless Area by developing the Burntlog Access Road, which violates the Idaho Roadless Rule, because this new road is “not needed,” as defined in the Roadless Rule, but is in fact one of several possible routes outside the specific mining area.

9. Degraded Wilderness Quality and Experience. The Frank Church-River of No Return Wilderness is located just east of the project area and will undergo adverse impacts. Sights, sounds, fugitive dust, polluted air, vehicle garbage, and other influences from the major Perpetua mine project will spill over the Wilderness boundary and be perceptible by Wilderness visitors. The DSEIS expects such sound impacts to be heard 1.5 miles into the Wilderness. In fact, given wind and weather conditions, and topography, it could easily be two miles or more. This will degrade their solitude, primitive recreation, perception of naturalness, and wilderness experiences in multiple ways. The DEIS did not and the DSEIS does not go into enough detail analyzing and disclosing the true nature and extent of these adverse and irretrievable impacts. The SDEIS needs to more fully and specifically disclose adverse impacts.

10. Plants Destroyed. The 3,266 acre Project disturbance will expose a massive area of challenging landscape to establishment and spread of invasive plants. Special Status Plant occurrences will be lost. Such losses need to be replaced. Occurrences of seven species of Special Status Plants would be destroyed by the Perpetua project. Modeled habitat for 11 other species of Special Status Plants would be destroyed. The FEIS needs to add more mitigation measures to restore habitat and recover more than 100% of these losses by area of plants and habitat for Sensitive and Forest Watch plant species, within five years of cessation of mine extraction operations.

11. Whitebark Pine Destroyed. The two Alternatives removes many acres of occupied whitebark pine habitat (a high percentage of the occupied area in the analysis area). This loss is adverse enough to a species heading toward disappearance, but in addition it will adversely affect bears, jays, nutcrackers, and multiple associated species. It would reduce chance for grizzly restoration. The SDEIS needs to present better ideas than eradicating the hundreds of individual whitebark pines through project modifications, mitigations; or find other creative ways. The SDEIS needs to add mitigation measures to restore habitat and recover more than 100% of these whitebark losses with a high probability of success.

12. Lost Inventoried Roadless Area Character. Perpetua claims that one of the design features is to “□ Minimize or avoid, where practicable, disturbance in designated Idaho Roadless

areas.” To the contrary, the Proposed Project fails significantly in this regard. The project would have adverse effects on four IRAs and adjacent roadless areas by constructing new and expanding existing roads, and in two IRAs, by installing permanent facilities like waste rock dump and tailings dump areas. Six roadless areas would lose a total of 740 acres to roads, and 524 acres would be lost to rock and tailings dumps. These are irretrievable losses of undeveloped character of the landscape, and irreversible for multiple generations to follow. The SDEIS failed to and needs to explore all possible measures, boundary adjustments, and mitigations to reduce these losses and preserve these IRAs.

13. Transportation and Traffic. City Roads and Traffic. Mining truck traffic will greatly increase and overload some city streets in McCall and some county roads in Valley County (DEIS Chapter 4). But the DEIS overlooked, and the SDEIS still overlooks, the impacts of these heavy and hazardous trucks on access routes through the city of McCall. Turning and merging truck traffic is likely to cause accidents with local and regional citizens’ and visitors’ vehicles. Intersections inadequate for truck passage and turning radius need to be redesigned and rebuilt to new standard, before the project begins, and at the full expense of Perpetua, not the taxpayer. After all, the DEIS promised that “the mining and ore processing planned by Perpetua will incorporate this work into the activities of the proposed Project, at no cost to taxpayers.” Appendix G, page G-9. These as well as all such mitigations need to be specific as to the season, specific to the road, and specific to the other forms of traffic including bicyclists, runners, and pedestrians. The DSEIS needs to be supplemented with these mitigations. This applies to State, county, and city roads through New Meadows, McCall, Donnelly, Cascade, Horsehoe Bend, etc. that will or may be used to access the Stibnite area. The SDEIS analysis needs to include State Highways 55 and 95, Warm Lake Road, Johnson Creek Road, South Fork Salmon Road, EFSF Salmon River Road, and Lick Creek Road. Employee traffic to and from the Stibnite complex needs to be analyzed over specific routes. Heavy truck traffic will markedly impact road surfaces and accelerate the deterioration of the asphalt surface and in some areas the substrate. Perpetua needs to pay mitigation fees to both prevent and repair this. And in each case, the degree of effectiveness of each mitigation measure needs to be stated in the SDEIS.

14. Toxic and Poisonous Chemicals. Heavy Perpetua trucks will transport fuel, diesel, propane, cyanide, antimony, and other toxic and poisonous substances. Accidental spills can enter rivers streams and wetlands, and damage and destroy ecosystems. They can expose people to these hazardous substances and threaten human life and health, especially in the more populated cities and towns. And especially in fall, winter, and spring seasons with their snowy and icy and mud covered road surfaces. It is not a question of if, but when, accidents and spills will occur. In a recent study of 27 modern American operating mines, monitoring results showed :

- 74% had failures to capture or control mine waste or seepage, often cyanide solutions.
- 100% had experienced at least one pipeline spill or accidental release, again often cyanide solutions, and diesel fuel.

These are the same hazardous liquids that will be transported in abundance to and through the Stibnite Project. Such spills have occurred here, and there is likelihood such spills will occur much more frequently here.

The proposed action needs to be supplemented to include site-specific hazardous spill prevention and mitigations for State, county, and city roads for the communities listed above. And not just to Highway 55, or to Cascade. But all the way to the loading points of the different haul trucks. Then the SDEIS needs to fully, specifically, and accurately disclose and analyze detailed impacts.

15. Landfill and Solid Waste. The SDEIS did not follow through and analyze where solid wastes of the mining construction, operation, maintenance, and reclamation will end up, or their secondary environmental effects. A 4-acre landfill site was identified for non-hazardous solid waste on the mine site, and other waste “would be hauled off-site for disposal” (DEIS). But it failed to disclose secondary effects beyond that. Specifically, what are those wastes? Where would they be end up disposed of? How much volume at each location, over the 25 year period of operation and closure? Will that exceed any of those sites’ capacity at some time?

16. Emergency Services Overwhelmed. The local fire, emergency medical, and law enforcement services are understaffed and underfunded already, and will be seriously overburdened by the mining operations at Stibnite. This will threaten public health and safety of the citizens. The rural fire protection district would be incapable of providing service to Stibnite. Specific problems that Perpetua has failed to address include: evacuating medical emergency patients from Stibnite, especially in winter, storms, ice, blowdowns, and other bad weather; extrication of accident victims from wrecked trucks and heavy mechanized vehicles without supplemental rescue machinery; emergency HAZMAT spill rescue and response; lack of response training; and other health and safety threats. Perpetua, not the taxpayer, must develop, commit to, and fund the needed mitigations for these problems caused by their Project. Effective mitigation measures to prevent these problems need to be developed and committed to by Midas before the project can be allowed to commence. Those measures that need to be in place upfront, not just promised, before the Project can begin. The SDEIS needs to fully disclose this specifically.

17. Denial of Tribal Rights. The DSEIS admits that the mining project will degrade salmon and other fish habitat, and reclamation will fail to improve it, or even restore it to current levels for salmon. This will not honor Tribal rights. It will violate the letter and spirit of treaties the United States of America legally signed with Native American Tribes in Idaho in the 19th Century. The Tribes were and are sovereign nations, guaranteed access to their ancestral lands, including the rights to hunt and fish and gather in “all usual and accustomed places” (Nez Perce Treaty of 1955). Perpetua halted the Tribe’s ongoing habitat restoration project when Perpetua took over the private land for its Project, ending to improving trend. The Proposed Project will deprive them of access to salmon that are lost to the project. It will block salmon access to Meadow Creek, and block Tribal access to most acres in the project footprint, and the acres of public land within the Operations Area Boundary. The exception is the new public access road through the mine operating area from Yellow Pine to Thunder Mountain summit, but it has multiple limits and restrictions that limit Tribal access. The Nez Perce Treaty of 1855, and the Shoshone-Bannock Tribes Treaty of 1868 pre-date the General Mining Law of 1872 and must be honored and respected. They were promises of the United States of American and need to be given precedence over the 1872 law.

18. Perpetua Track Record. The SDEIS did not do a good job of evaluating and disclosing the effectiveness of each of its mitigation measures in the action alternatives, or the total aggregate effect of the total package of mitigation measures under each alternative. Effectiveness of the mitigation measures used is key to environmental consequences, as multiple court decisions have established. One key factor in the criteria for effectiveness is the past track record in applying mitigation. What has been the track record of Perpetua Resources in applying mitigation measures to their other mining and construction projects comparable to this one? How effective has their mitigation program over the short term, but also the long term such as the 25 year total lifespan of this project's activities? What projects of this size have they completed, and how well or how poorly? What did the Forest Service learn from this record, and how did it apply that to the level of credibility Perpetua's plans and promises have in their assessment? The Forest Service needs to report this.

19. Effectiveness of Future Mitigation Less Likely Than Immediate Effects. The overall mitigation philosophy of the Midas proposal tries to portray a degraded present condition as a static, negative condition, to contrast against a conceptual optimistic restored future condition. This is an unequal comparison. It fails to correctly portray the present condition as dynamic, with long-term restoration and natural recovery underway. The Meadow Creek valley floor for example, has decades of restoration completed. However, the Proposed Project would undo much of that by covering it over with spent deposits and create another major open wound on the landscape again. Is it really wise and necessary to rip off the scab and create a new wound there? The analysis needs to project positive trends of the current recovery and restoration situation over time, not just a static current situation. Similarly, from an economic analysis standpoint, the DEIS and DSEIS pose the tradeoff as between actual ongoing recovery now at Stibnite, and proposed recovery ("restoration") benefits decades in the future. Therefore, those benefits will be uncertain. But, the adverse consequences of construction and operation will be real, and near-term. Those costs will be almost certain. Thus, this is an unequal tradeoff, sacrificing present benefits (environmental qualities) today, for uncertain benefits (environmental remedies of damage) in the future. The SDEIS needs to reframe the cost-benefit tradeoff analysis between the two categories of benefits more objectively.

20. Fish Tunnel and Back-Up Gathering May Both Fail. The EFSR temporary diversion tunnel idea is still planned in the DSEIS. But it may be a failed experiment. According to the U.S. Fish and Wildlife, "there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively." The experimental tunnel has a low chance of succeeding and a high risk of failing. The consequences of this failure may be severe, including an irretrievable loss of Chinook salmon local population up the EFSR. The back-up contingency plan of hand-collecting the fish has its own problems putting its success in question. So that plan itself also needs a back-up plan. Does the DSEIS have one and analyze it? It needs to do so more extensively than SDEIS p. 2-119 given the regional importance of this key fish species and sensitivity of this sub-population.

21. Monitoring Responsibility. The SEIS and FEIS must make it clear exactly what entities are responsible for each monitoring throughout the entire 35 year term of the project. In no cases should the Forest Service take on, or assign monitoring responsibility away from, Perpetua (or its successors) to the Forest Service or other Federal, State, or local agencies of individuals.

22. Restoration Without Mining. Perpetua in its Proposed Project seems to believe “the “village must be destroyed to save it later.” This assumption is false. Instead of the proposed action of superimposing a major new mining complex on top of a badly degraded but slowly recovering landscape, the better and more logical alternative is to continue the present recovery underway and increase restoration actions to help nature take its course.

23. Forest Plan Amendment. The DSEIS briefly and inadequately handles the attempt to make numerous Forest Plan amendments. It tries to make the Plans accommodate the Project, rather than take the harder route and make the Project accommodate the Forest Plans. The 36 CFR 219 Regulation requirements (219.13 (b) (5)) need to be fully met.

CONCLUSION

This is one of the most destructive projects ever proposed on the Payette and Boise National Forests. It is one of the worst places to approve a mine, especially without full and rigorous environmental review and application of all possible mitigations to protect the public interest.

The Forest Service should not be advocating precisely the exact same Proposed Project as the proponent. It needs to require the essential measures and mitigations that the mining company does not favor. Unmitigated environmental damages are unacceptable. Please do the right thing and incorporate into the Project decision all needed measures to safeguard the National Forest resources, not just the ones Perpetua consents to protect.

Yes, “Restore The Site.” But don’t destroy the environment to save it. Make this a truly environmentally beneficial mining project.

Thank you for this opportunity to comment.

Sincerely,



Samuel C. Cousins

cc: Sen. Patty Murray
Sen. Maria Cantwell
Congressperson Rick Larsen
Congressperson Chellie Pingree