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Comments: Stibnite Mine Project EIS #50516

I stand strongly opposed to the Stibnite Mine project for the following reasons, and I urge the USDA (Forest Service) to require another Supplemental EIS to address the following issues associated with this project.

- 1.The EIS and SEIS fail to describe the actual negative impacts to the economy of Valley County. It seems that they are biased toward the mining company and do not portray a true picture of what will happen to this area. The projected net income compared to the actual estimated costs to the community appear to show the local economy having to spend more money that they might receive.
- 2.The negative social impact a transient, highly-paid workforce might bring to the rural communities of Valley County would detract from the factors that contribute to an unusually high standard of living and degrade from the social factors which come with a long-established group of citizens who know each other well, and who have their neighbor's interests at the heart of their activities.
- 3.The actual likelihood of toxic spills and increased traffic along highway 55 and other non-paved routes to and from the mine site are minimized in the SDEIS. According to the analysts of IHESG, " The DEIS states that there will be 12,775-17,885 heavy vehicle trips every year, many loaded with hazardous chemicals (diesel, explosives, sulfuric acid, and sodium cyanide). Transportation routes north and south of Valley County are along major rivers, including the North Fork Payette River and the East Fork of South Fork of the Salmon River. This could potentially be 255,500+ trips on Idaho's 2nd highest year-round road (Hwy 55) over the course of the mine's operation. Even spill risk of .01% would result in at least 25 spills on roads, crossing sixty-nine waterways. These numbers indicate that the impacts that spills and accidents have on the environment and human safety along the transportation corridor should be seriously and thoroughly considered."
- 4.The lack of monitoring of the tailings site. Failure of the dam would be swift and catastrophic. Technology is available to apply more rigorous standards to the construction and maintenance of this part of the project, which would reduce the risk, but it is not being required by the Forest Service. We can, and should apply higher standards.
- 5.The lack of air quality monitoring.
- 6.The effects on fish habitat - per the SDEIS, "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..." (SDEIS Fisheries Specialist Report p. 150). I object to the framing of this as a "restoration project."
- 7.Degrading the nearby Frank Church-River of No Return Wilderness with noise and light from mining activities. Idaho contains some of the few remaining dark sky areas. Our remote noise and light-free areas may not be quantifiable in monetary terms in the way that gold and antimony are, but I would argue that their intrinsic value and the irreplaceable role they fill in the natural system deserve equal weight in the decision making process.

The applicant, Perpetua, paints a rosy picture of potential benefits which are more than outweighed by the facts laid out in the independent report submitted by IHESG. When the benefits (extracting of metals useful in battery production and in the defense industry) are considered against the potential of permanent destruction to the natural environment in and around the mine site, it becomes clear to me that much stricter standards of production, waste management and monitoring are necessarily required before any serious consideration of approving such a project should move ahead. Please bring these concerns back to the applicant and require that they satisfy the real economic, social and environmental issues that this project will create. We only get one shot at this. No amount of reassurance will help clean up toxic waste once it's unleashed from a failed tailings dam. We need hard facts backed up by real accountability that is built into the process.

Ideally, this project should be placed elsewhere, in a less environmentally sensitive area. At the very least, higher

standards must be applied to making sure it is carried out in the cleanest, most responsible manner possible.

Respectfully yours, Laura Lehrer