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Title:

Comments: Date Submitted: 1/10/2023

First Name: Caleb & Sophia

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Organization: Elk Springs Outfitters LLC

Title: Owner/Outfitter

Comments: Comments on the Perpetua Resources Proposal for the Stibnite Mine

To whom it may concern,

We find great issue with the Stibnite Gold Project SDEIS.

Elk Springs Outfitters has operated in the proposed area for over 20 years. Outfitting is a labor of love, and we make this career choice our livelihood. We understand that mining is an essential industry, however, in this instance, the implications it has on the land and businesses involved makes the SDEIS problematic. Is there truly a need for an expansion on this mine for gold? If the promise of antimony is truly the draw, why does the mine's footprint need to be this large if antimony can be mined underground? In this comment, we will address not only the implications this proposed project will have on the land and wildlife in the area, but also the implications on our business that could be irreversible and irreparable.

Wildlife: The wildlife in this area will be impacted not only by the construction of the mine, but more detrimentally, by the increased access to the area and increase in people. The large footprint of the proposed mine boundary is enough to raise concern for wildlife in that area. However, they will move. What is more concerning in regard to wildlife is the increased access to this land. This mine proposal is promising to bring in hundreds of thousands of jobs. It would be ignorant to think these folks won't take the opportunity to hunt the area (responsibly or not). This expansion would displace the local wildlife by increasing the risk of poaching, motorized vehicle use on roads and trails, noise from mine construction and operation, trapping, and overall increased human presence.

Wilderness: While we know and acknowledge that our permitted area is and always has been public land, there is a limited amount of people who venture into this area given its rugged terrain. Creating more accessibility to this area will bring in more folks (whether they be mine employees or the general public) that may not know the proper etiquette for recreating in these areas. This is sure to have a negative impact on the existing trailheads and accessible wilderness. Also, with the boundary increasing accessibility to the Frank Church, this opens up the opportunity for increased illegal motorized vehicle usage in our national forests and prized wilderness.

Water: Drinkable water is already an issue in the town of Yellowpine. This mine expansion's proposed location is directly on top of the headwaters of a major tributary to the South Fork of the Salmon. Its negative implications on the water sources will only make water accessibility and quality worse. Not to mention filling critical salmon spawning areas with overburden. How can this be a sound decision when for years, the state has been bending over backwards financially to recoup salmon populations? This seems irresponsible.

It could be argued that the chemicals that will be present in the proposed project area are responsibly handled and only used in safe or unharmed quantities, however, accidents happen every day. If contaminants were to make it into the water sources, what is going to happen when the wildlife come down in the colder months and need clean water sources? In an area where the water system is already so fragile, why are we taking the risk of having something catastrophic happen?

Elk Springs Outfitters: On p. 4-522, the SDEIS specifically calls out that approximately half of our operating area will be negatively implicated by this project. According to the SDEIS, during construction, we will have little to no access to that portion of our area. After construction, access to that area will be forever changed with new roads, infrastructure, increased traffic, and new motorized use. How are we to continue offering our services to clients when a fruitful portion of our operating area may become unavailable for us to hunt on? This is sure to degrade our clients' experience. Our clients choose to hunt with us for the backcountry wilderness experience that can only be offered in Idaho and presents them with big game opportunities the every-day hunter doesn't typically get. Construction, mine operations, noise and activity will make this portion of our licensed area worthless for not only hunting, but offering that off-the-grid, backcountry experience to our hunters. The displacement of the wildlife from increased human presence, noise, motorized vehicle use, and other previously mentioned factors will render this portion of our operating area a ghost town for wildlife pushing them into areas that we are not permitted to hunt. The potential promise of possible cell phone service for increased client safety is not a selling point. Our clients want off the grid and we have satellite devices with SOS capabilities for safety.

During construction, road closures could possibly restrict access to our operating area beyond the proposed project footprint. The portion of our permitted area that falls within the project footprint may permanently be implicated by air permits restricting us from even traveling through the proposed area to get to other camps within our permitted operating area. Perpetua Resources seems willing to work with outfitters to mitigate these concerns. However, while we are hopeful that we can work with Perpetua Resources in the future to ensure access to our permitted area and maintaining a quality experience for our hunters, we also have a responsibility to make sure all agreements are legitimate and backed by the Forest Service and Licensing Board to ensure we are not in violation of our use permits at any time.

While we cannot guess the monetary loss our business may incur as a direct result of this proposed project, there is no doubt that this could have a lethal impact on our ability to operate our business. Big game is already sparse in our area. The last thing we need is more people, noise and developed land to drive away herds. With the proposed construction phase and 12-15 years of mining, our business cannot survive the life of this project with the current restrictions to our operating area as displayed in the SDEIS. If something like this is going to be approved, Perpetua Resources in partnership with the Forest Service should be held responsible in working with outfitters and the Idaho Outfitters and Guides Licensing Board to ensure any implicated areas are transferred to different permitted areas outside of the project map. We would ask that the Forest Service take these concerns seriously and have the proposal address the issues.

Caleb & Sophia Hartsock - Elk Springs Outfitters
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