Data Submitted (UTC 11): 12/27/2022 12:12:30 AM
First name: Virginia
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Organization:
Title:
Comments: Dear Forest Service (Payette and Boise National Forests):

This is to comment in favor of approval of the preferred alternative mine and reclamation plan submitted by Perpetua Resources for a gold and antimony mine in Valley County, Idaho, as described in the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project. I have reviewed the Executive Summary, some of the additional chapters and am very familiar with the site, the project, and both the Johnson Creek and Burntlog routes. I also know that antimony is a critical mineral, largely mined in China, and that the Stibnite District offers one of the few commercially viable options in the United States for production of a "clean" antimony concentrate. The site has a number of legacy environmental concerns which partially date from historic tungsten and antimony production during wartime for the U.S. government. The site clean-up and restoration proposed by Perpetua is the only way to alleviate those concerns and allow the gold mining to pay for the construction and remediation work. The Forest Service and the nation will not get a better deal than this. Are there concerns and risks associated with the project - yes. But any action (including no action) has risks. The company has shown that it has the mindset and technical expertise to jointly work with the Forest Service, other federal and state permitting agencies, and stakeholders to both mine and reclaim the mine site - in my professional opinion. Mining in Idaho's backcountry is not new. Some 30 years ago, there were two open pit gold mines operating at Thunder Mountain, further into the wilderness past Stibnite. Those areas were successfully reclaimed and have been long forgotten by the public. In my many trips over the past 30 years in to Stibnite along the East Fork of the South Fork of the Salmon River, I have seen only a few campers, no Native American representatives, and a lot of great scenery in spite of the Yellow Pine pit upstream. The photo plastered on the cover page of the SDEIS looks just like one I've personally taken; this area is definitely a brownfield site with much of the damage done prior to any environmental standards and in the interest of national defense. Standing in the pit once, I watched a deer and two fawns come down for a drink in the pit lake on a hot afternoon in spite of the historic mining. Still, the wildlife habitat and water quality can and will be improved greatly if Perpetua's plan goes to completion. I would actually recommend, if exploration and economics warrant it, mining additional resources to ensure ample funds for the restoration and closure, as well as to more efficiently extract the mineral resource.

My main concern is the construction of the higher elevation Burntlog haul road and safe transport along it during the winter as well as the increased traffic on the Warm Lake Road. But the Johnson Creek route also has its problems as is well analyzed. Johnson Creek carries more tourist and local traffic and follows the river. I would also stress the need for "over-engineering" and careful geotechnical and geological studies prior to final design/construction of tailings storage facilities or overburden (waste rock) piles. The Forest Service and other agencies will need additional competent, expert regulatory personnel inspecting work on the ground to provide timely and regular oversight. One suggestion is to not hurry construction and mining when the weather is too bad.

In short, the Forest Service should approve the project as per the legal guidelines of NEPA. It would be easier to mine the gold and antimony if the site were on flat, unattractive land near an interstate highway and existing industrial park - or in China. But that is not where Stibnite is; we can only mine mineral resources where the ore is. Stibnite hosts valuable antimony which the country needs and gold which pays for all the other things we need. The proposed action (2021 MMP) deserves approval and implementation. Thank you.