

Data Submitted (UTC 11): 1/8/2023 8:12:36 PM

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Organization:

Title:

Comments: Stibnite Gold Project SDEIS

Comment Letter

1/8/23

#### My Perspective:

I have been a fulltime resident of Adams and Valley Counties since 1995 when I transferred to the Payette National Forest as the Timber Manager for the West Zone. I hike, ski, snowshoe and kayak in this area. And I have children and grandchildren who recreate in this area. The mountains, forests, rivers and streams here are irreplaceable treasures that should be protected for future generations.

#### Thorough Planning and Adherence to Standards and Laws:

In my position as a timber manager I was involved with numerous environmental assessments and environmental impact statements for large timber projects. Mitigation measures to protect water quality, stream temperatures, soil productivity, fish and wildlife habitat, scenic values, and recreation quality were thoroughly developed for these projects. Forest Service specialists ensured that these projects met all Forest Plan standards as well as all federal and state environmental laws and regulations.

The Stibnite Gold Project (SGP) as described in the current SDEIS is not being planned with the level of natural resource protection required for large timber projects. Four Forest Plan amendments are included in the current plan:

1. Project implementation actions may degrade aquatic, terrestrial, and watershed conditions in the areas affected by the project.
2. Actions may convert productive soils in the project activity area to non-productive soils (Total Soil Resource Commitment) indefinitely.
3. Actions may degrade visual quality in areas affected by the project.
4. New water diversions allow upstream and downstream blockage of fish passage in areas affected by the project.

And habitat for three threatened fish species will be degraded: Chinook Salmon, Steelhead, and Bull Trout.

This project should not be considered to cause no significant harm to natural resources when four Forest Plan amendments are needed for it to meet Forest Plan standards, and habitat will be degraded for three threatened fish species.

The Stibnite Gold Project should be planned and reanalyzed with the same level of natural resource protection and adherence to the Forest Plan and federal and state laws as a large timber project. Forest Plan amendments should not be needed and habitat for threatened species should not be degraded.

#### Economic Impacts:

The only study regarding economic impacts of this project was conducted by Highland Economics for Perpetua Resources in 2018. In the executive summary of that study it clearly states "We did not evaluate potential economic impacts due to possible effects of the SGP on other economic activities, such as the recreation and tourist industry".

The Stibnite Gold Project should be planned and reanalyzed with consideration given to the negative economic effects that could occur in the local communities. This would reduce the negative impacts to the local economy.

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#### Alternative Mining Method:

Perpetua Resources has used the shortage of antimony in this country and its necessity for clean energy and national defense as a publicity tool to gain public support for the project. I agree that our country should have a plentiful source of antimony and other rare minerals to keep us secure and independent now and into the future. However, there is no scarcity of gold and the negative environmental impacts of this project could be significantly reduced if the production of antimony was the primary objective of the project.

The Stibnite Gold Project should be reanalyzed with the recovery and production of antimony as the primary project objective. This would reduce the negative impacts to natural resources.

#### Mine Traffic Impacts:

Transportation analysis for the SGP ends at the intersection of Warm Lake Road and SH 55. The transportation analysis should include the full transportation route. It should include routes for fuel transportation, hazardous chemicals and reagents used in ore processing, and dynamite and ammonium nitrate used for breaking the bedrock matrix and ore deposit matrix. The analysis should also include potential risks associated with transporting these materials through municipalities and near waterways along those routes.

The Stibnite Gold Project should be reanalyzed to include impacts and risks along the entire transportation route. This would reduce the potential negative impacts to waterways and communities along this route.

#### Climate Change Risks:

There are reports from industry, regulatory agencies and academia that identify the increased risks of climate change to the mining industry and the need to incorporate climate change predictions into mine plans and practices. Abnormally high levels of precipitation can destroy waste dumps, seepage capture systems, and mine access roads; cause impoundments to overflow and dams to be breached; and push water treatment costs over-budget or cause releases of untreated water.

The Stibnite Gold Project should be reanalyzed to include the potential impacts to mine infrastructure related to the effects of climate change, and the potential environmental consequences. This would reduce the potential negative impacts to natural resources.

Jeff Canfield, Retired Forester