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Comments: January 8, 2023

Subject: Supplemental Draft EIS Comment Letter

Submitted to: Payette National Forest
By: James Petterson, McCall, ID 83638

Dear Payette National Forest Supervisor Jackson,

Please accept my written comments regarding the Supplemental Draft EIS Stibnite Gold Project being proposed by Perpetual Resources. I have lived in McCall for 11 years and have many wonderful memories, hiking, boating, camping and hunting in the East Fork of the South Fork Salmon watershed over the years. I cherish these areas and do not want to see them permanently altered by operation of the destructive gold mine being proposed.

I am aware of the principles and legal requirements outlined in the 1970 National Environmental Policy Act, Endangered Species Act, and 1872 Mining Act and based on those principles, I respectfully request that you choose the No Action Alternative option listed in the SDEIS.

This is based on the simple fact that the project, as proposed by Perpetual Resources, does not meet the standard of NEPA that states that the proposed project will not cause long-term, permanent impacts to important natural resources. While there are mitigation measures proposed by Perpetual to reduce impacts to federally listed T&E fish species, the implementation of the project will nonetheless result in:
1. The destruction of important adult fish spawning and juvenile fish rearing habitat at the mine site itself,
2. Killing of endangered salmon, anadromous steelhead, cutthroat and bull trout individuals during mine construction, modification, and operation activities
3. Destruction of adult fish spawning habitat upstream from the mine in upper Meadow Creek, which is designated as critical habitat for both Bull Trout and Chinook Salmon, will be blocked and inundated by millions of pounds of mine waste.
4. Pose a permanent risk of toxic chemical spills downstream of the site due to the tailings ponds

These impacts are described in more detail in the following:

1. The SDEIS displays major shortcomings of virtually every factor used to evaluate impacts to fish (particularly intrinsic potential, streamflow productivity, barrier, and stream temperature models), and concludes negative impacts to Chinook salmon, bull trout, steelhead, and west slope cutthroat trout and their habitat.

2. The SDEIS incorrectly assumes that mitigation and restoration efforts are possible and effective. SDEIS mitigation methods proposed rely heavily on unspecified and/or unproven habitat "improvements," fish salvage, and trap and haul operations.
Already threatened salmonid populations will not be restored by (and may not survive) mining activity and the mitigation methods proposed in the SDEIS.

3. Water temperature increases are underestimated, and their impacts are unreasonably minimized. The SDEIS reports alarming increases in stream temperature in occupied salmonid habitat: "Meadow Creek temperatures

are predicted to increase by up to 10 degrees C as the stream channel is "restored" atop the TSF" (SDEIS 4-275). And: " On the Meadow Creek segment atop the reclaimed TSF, temperature….would remain warmer than existing conditions after 100 years"

4. The Stream Function Analysis is an unproven, unrepeatable model, based loosely on Watershed Condition Indicators (WCIs), used in the SDEIS to assure mitigation for the Stibnite Gold Project's unavoidable impacts on jurisdictional aquatic resources.
Using a new, unproven, made-for Stibnite model does not comply with NEPA's best available science requirement.

5. The SDEIS does not adequately consider synergistic effects on fish.

6. The SDEIS fails to acknowledge the broad ecological understanding that multiple stressors will amplify one another's effects on the ecosystem.

7. Impacts to all non-salmonid fishes - and other aquatic life that support them- are ignored in the SDEIS. Ignoring impacts to salmonid food webs is equivalent to ignoring impacts to salmonids at large.

8. The validity of the model results should be viewed with skepticism. Models used to predict fish habitat conditions are fraught with uncertainty. Multiple models used to describe various aspects of habitat are flawed oversimplifications of salmonid ecosystems, and/or rely on model inputs generated by other flawed and inaccurate models. This renders their utility for predicting and measuring impact questionable at best.

9. Water quality: Multiple contaminants of significant concern to salmonids and other aquatic life received little consideration.

Restoration of the previous environmental degradation caused by legacy mining is better accomplished by a targeted funding effort to continue the already impressive restoration activities that have been done by the Nez Perce Tribe, US Forest Service and partners.