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## Title:

Comments: First, before I get into some of the details, I just wanted to start by asking--how is it that it is 2023 and we are still worrying about someone building a gold mine in a pristine backcountry wilderness river corridor? Is there not enough gold in this world? We can barely restore areas laced with toxic chemicals from previous (failed) gold mines and yet here we are, lurching towards destroying another jewel of Idaho for temporary profit? In a way, we should all be ashamed to be sitting here going through this. It is, in so many ways, a collective failure of imagination. The Stibnite Gold Mine will not last forever--it will mar and destroy the natural beauty of the EF/SF Salmon and then, when it inevitably closes or goes bankrupt, as most of these projects do in the long run, it will once again be on us as the taxpayer to foot the heavy cost of restoring the area to its natural state--something we can't easily or quickly do.

Perpetua likes to tout its antimony mining as the "critical" element it is miningas if it was performing some sort of public service, but its own report notes that 95% of its profits will come from mining gold. Unless we are to believe that a mining corporation is profit-agnostic, this is a gold mine project, full-stop. Likewise, while Perpetua also likes to claim that the area it is mining on is land previously disturbed by mining projects, more than half of the actual project (51% of its 3,200 acre footprint) will be on previously undisturbed land. Additionally, the previously disturbed land it would be built has been undergoing restoration for years. Seems ironic we as the taxpayer have spent time and money restoring another failed mine's destruction, only to turn around and let another mine in to waste our efforts and likely leave us on the hook again.

The Stibnite Gold Mine will also have a heavy impact on critical habitat for ESA-listed chinook salmon, steelhead, and bull trout. Perpetua likes to say that their project is a "restoration effort" which stretches the meaning of restoration according to your own data. The US Fish and Wildlife Service, in its comments on this project in 2019 states that, due to the experimental tunnel design, "there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively." Your own analysis asserts that the Stibnite Gold Mine will likely result in the temporary or permanent displacement of chinook salmon from the project area, and that there will also be a, "net decrease in both quantity and quality of habitat for bull trout and westslope cutthroat trout." This is absolutely unacceptable. There is more gold, silver, and antimony to be found elsewhere, and we certainly should not be intentionally destroying habitat for animals that are already in a precarious position anyways.

Also, how is it that you can justify a degradation in groundwater water quality based on the fact the area doesn't meet drinking water regulatory criteria. Existing degraded water quality (some related to previous mining efforts!) should not be used a rationale for activities that further pollute groundwater in the project area. Likewise, the loss of the upper Meadow Creek valley wetlands an riparian areas--previously undisturbed by any mining activity--is a loss that cannot be restored or mitigated. Restoring wetlands off-site is a cop-out. The value of a remote, pristine, high-elevation mountain wetland should be considered differently than whatever random low-elevation land Perpetua can purchase hours away and restore with minimum effort.

Finally, your SDEIS claims that "no significant impacts were identified for special designations." Given that water flows downhill (I believe this is true), and the Wild and Scenic Main Salmon is immediately downstream of this project, how is this finding possible, other than an incredibly myopic and narrow-minded reading of the impacts of this project? And, while the SF Salmon and EFSF Salmon are not designated Wild and Scenic, they are still river corridors with exceptional recreational and wilderness character that have been proposed for inclusion as Wild and Scenic rivers. Under the WSRA and Payette National Forest's own plan, eligible and suitable rivers must be preserved in their free-flowing state and have their water quality protected as if they were a designated Wild and Scenic River. You even admit in your own SDEIS that you don't have any baseline water quality data for where

the Stibnite Gold Mine project will intersect the SF Salmon. How, exactly, can you then conclude that water impacts will be "too small to measure"? A bold statement considering you didn't actually measure them?

This is a project from the 1860s transported to 2023. There is no reason for it to exist other than raw destruction of a pristine mountain environment held in public hands so that a few can secure temporary profit before inevitably failing and leaving us, the taxpayer, to clean up their mess. I am firmly against this project.