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Comments: Monday, January 9, 2023

Subject: Stibnite Gold Project proposal warrants additional analysis. Please deny the permit for Perpetua Resource's Stibnite Gold Project and require Perpetua to finish cleaning up the mine site. -- Stibnite Gold Project EIS #50516

To USFS Chief Randy Moore, Payette National Forest Supervisor Linda Jackson, Krassel District Ranger David Hogen, Boise National Forest Supervisor Tawnya Brummett, and Cascade Ranger District Ranger Jake Strohmeier,

Thank you for the opportunity to provide the following comments on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS).

I am writing to urge the Forest Service to conduct additional analysis for the Stibnite Gold Project, which is in the headwaters of Idaho's South Fork Salmon River. As detailed more below, the current SDEIS is not sufficient or lawful because it:

1. fails to adequately consider impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers or opportunities to mitigate impacts;
2. lacks key information and analysis necessary for an informed public review under the National Environmental Policy Act (NEPA); and
3. needs to consider a reasonable range of alternatives.

Absent additional analysis, I do not believe that the most basic requirements of the NEPA will have been met.

"It is horrifying that we have to fight our own government to save the environment."

-- Ansel Adams

Impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers have not been adequately considered. The SDEIS completely fails to address potential adverse impacts to the congressionally designated Main Salmon and Middle Fork Salmon rivers. Impacts to water quality in the South Fork Salmon River and its headwaters may negatively impact the Outstandingly Remarkable Values (ORVs) of the Main Salmon River. The Middle Fork Salmon River will likely be impacted, as the Burntlog access route uses significant portions of the high divide that separates the South Fork Salmon and Middle Fork Salmon River watersheds. Light, visual, water, and dust pollution may impact the scenery ORVs of the Middle Fork Salmon River. Additionally, three rivers within the project analysis area have been deemed to be eligible or suitable for inclusion in the National Wild and Scenic Rivers System: Burntlog Creek (eligible), Johnson Creek (eligible), and the South Fork Salmon River (suitable). While the SDEIS acknowledges that mining activities would adversely impact ORVs for water quality and fish, there is no consideration of mitigation measures to reduce impacts-such as graveling access roads to reduce sedimentation.

The Stibnite Gold Project also puts the famed Frank Church-River of No Return Wilderness at risk, as well as the East Fork of the South Fork of the Salmon River and endangered species such as salmon, steelhead, and bull trout. Under the preferred alternative, road construction and mining operations would cause serious impacts to the River of No Return Wilderness, including noise audible from a nearly 2-mile radius, wildlife disturbance and displacement, increased access to and activity in what are now quiet and lightly-visited places in the Wilderness, and sediment pollution in streams within the Wilderness. The wilderness evaluation erroneously downplays these impacts. The new proposed road would sit 100 feet from the wilderness boundary or could even enter the

Wilderness, as the most logical location for the road seems to be an existing pack trail that dips into the Wilderness.

The SDEIS lacks key information and analysis necessary for an informed review as required by NEPA, including basic engineering specifications and analysis of the tailing's storage facility, sediment modeling, or detailed reclamation plans.

The SDEIS fails to consider a reasonable range of alternatives. The SDEIS only considers the mine applicant's proposed mine plan and no alternative action. This is not a reasonable range of alternatives. Please evaluate an alternative that utilizes underground mining operations rather than open-pit mining. Underground mining operations would greatly reduce the most adverse environmental impacts and must be considered. At minimum, the Forest Service should consider a third alternative that significantly reduces negative ecological impacts.

Finally, the Stibnite Gold Project will negatively impact the treaty-reserved rights of the Nez Perce Tribe and other indigenous peoples. The SDEIS clearly states that "Adverse impacts to tribal rights and interests under either alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe's salmon restoration efforts."

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Please incorporate missing information and analysis necessary to make an informed decision among alternatives and allow additional time for public comment prior to issuance of a Final Environmental Impact Statement (FEIS) for the Stibnite Gold Project. The last thing this area needs is more toxic mining and associated impacts. The Forest Service needs to deny the permit for Perpetua Resource's Stibnite Gold Project and require Perpetua to finish cleaning up the mine site.

"The ultimate test of a moral society is the kind of world that it leaves to its children."

-- Dietrich Bonhoeffer

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA