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Organization:

Title:

Comments: To whom it may concern,

I am writing to request a 75-day extension of the minimum 45-day required public comment period-for a total of 120 days-for the Stibnite Gold Project Supplemental Environmental Impact Statement (EIS) expected to be released in August 2022.

The proposed Stibnite Gold Project in the headwaters of the South Fork Salmon River watershed:

? is highly controversial.

? has the potential to significantly impact resources of high public interest, including ESA-listed threatened fish, an adjacent Wilderness area, rivers that are eligible for Wild and Scenic River designation, Idaho Roadless Areas, and extensive ecological and recreational resources.

? is an extraordinarily complex project for the public to review.

Even with restoration components, no other permitted use of our public lands so dramatically and permanently impacts the landscape, soil, water and wildlife as large-scale mining.

The National Environmental Policy Act (NEPA) requires the Forest Service to disclose the environmental impacts of the proposed Stibnite Gold Project and consider public comments in selecting alternatives and mitigation measures.

The two fundamental objectives of the NEPA process are:

? ensuring that the Forest Service has sufficiently detailed information to make a reasonably informed decision.

? encouraging public participation in the development of that information.

Public input is critical in helping the Forest Service to recognize the magnitude of the mining project's potential impacts and to find ways to avoid, minimize, and mitigate them.

The Stibnite Gold Project is far more complex than originally anticipated. It took nearly five years to release a draft EIS, which was over 2,500 pages, not including appendices and supporting documents. In fact, the Forest Service recognized this complexity and preemptively decided to allow for a 60-day comment period because of the level of documentation associated with the project.

However, this time frame was insufficient because:

? the time and resources required by the interested public, particularly those who live and work in this area, is limited.

? the complex scientific analysis requires seeking outside assistance to understand and meaningfully comment on the Forest Service's analysis.

? the impacts that this proposed project will have on the South Fork of the Salmon.

River watershed is of great concern to me and my family because we regularly visit the watershed for (camping, hunting, fishing, hiking, float boating, botanizing, berry-picking, birdwatching, spiritual and cultural reasons, etc.) and I/we desire a meaningful opportunity to research and provide important feedback to the Forest Service based on my/our experience with and local knowledge of the watershed.

Of significant concern, the draft EIS was based on several assumptions that the environmental effects of the

proposed mine would be manageable. Yet, these assumptions were not borne out by the analysis, revealing the following shortcomings:

- ? Direct loss or injury of 100,000 fish and the net loss of 26% of critical habitat for Chinook Salmon and 28-70% of critical habitat for Bull Trout, even with mitigation.
- ? Unacceptably high water temperatures in the East Fork South Fork Salmon River.
- ? Predicted increase in heavy metal loading, requiring water treatment in perpetuity.
- ? The EPA determined that the draft EIS contained "inadequate analysis to determine the effectiveness" of water treatment to mitigate water quality impacts.

The EPA also concluded that it had ongoing "significant concern regarding potential impacts to water quality and aquatic resources" and that there would be "long term contamination of groundwater of unknown extent" after the mine closes.

Because of these shortcomings, a 120-day comment period is necessary to ensure adequate time to review and provide meaningful, substantive comments to the Forest Service to ensure that its ultimate analysis and decision do not suffer from the same fatal flaws.

The complexity of this project is further illustrated by the fact that Perpetua Resources has made several substantial changes and these changes necessitated a supplemental EIS.

That Perpetua Resources and the Forest Service spent nearly five years on the initial environmental analysis that was later found to be inadequate by the EPA and the public, and that now requires a supplemental DEIS, is extremely troubling.

Although I/we appreciate the fact that the Forest Service ultimately decided to utilize a supplemental DEIS, the fact that a supplemental DEIS was deemed necessary highlights the complexity of the project.

If the Forest Service needed significant additional time to analyze the project, the public absolutely needs a 120-day comment period to review that analysis.

A 120-comment is necessary to meet NEPA's basic purpose to ensure that the Forest Service makes a reasonably informed decision, which includes encouraging meaningful public input so that it may be adequately considered in the decision-making process.

The Forest Service's motto is "Caring for the Land and Serving People." Hosting a 120-day comment period will further this mission by best serving the people who care deeply about and are inextricably intertwined with the South Fork of the Salmon River watershed.

I respectfully request that the Forest Service provide a 120-day comment period for the Stibnite Gold Project Supplemental DEIS. Will you grant this request?

Sincerely,  
Sarah Moran