Data Submitted (UTC 11): 1/9/2023 7:00:00 AM
First name: Mike
Last name: Medberry
Organization:
Title:
Comments: Dear Linda et al:

Please accept these comments on the Stibnite Gold Project Draft Supplemental Environmental Impact Study.

Introduction and history

Gold and silver are as worthless as dirt. And, unfortunately, as valuable as the soul of humanity. Gold is in our blood. By contrast, antimony makes money on tangible products which makes it a more productive mineral to use. Regardless, Stibnite has had a hundred years of wanton dredging and sluicing, endless pit-digging and filling, claim staking, tunnel building, fish ignoring, wildlife killing, cyanide using, and land bashing activities that make a bold person turn to stone. That is the legacy that we face. Gold. It's just gold digging. And it is condoned by making gold digging legal and profitable because of the 1872 Mining Law. As amended. That's just the way it is until the Mining Law is heatedly challenged and the giveaway is beat to the dust. But that's where we are in 2023: living with a quickly conceived and damaging mining law.

There is a long history of mining and restoring the evils of mining in the Stibnite region, from the discovery of gold, silver, mercury, antimony, and tungsten in the early1890's to the latest massive plan by Perpetua Resources Ltd. The Meadow Creek Silver Mines company started mining in 1914 and created the Hangar Flats and created a hydropower site. The Yellow Pine Company which began in 1929 cut adits and underground access to the Monday, North and Cinnabar mining tunnels. In 1939 the Bradley Mining Co. started working, crafting an enormous open-pit and built the Bailey tunnel. Bradley found tungsten and antimony in addition to gold and silver and they made salmon, steelhead, bull trout and lamprey passage impossible above the pit on the East Fork of the South Fork of the Salmon River. Mining was shut down at the Bradley in the 1950's and the pit filled with water. In 1974, Superior Oil Co. bought the place with the great idea of starting a cyanide heap leaching process to dissolve the gold and then to get it out of solution by some magic spell. By 1996 Superior had churned up 6 million tons of pregnant ore and made their fortune on the gold.

Then came Mobil Oil Co. and Hecla and then Pioneer and several other smaller companies. Hecla leased Bradley's claims from 1988 until 1992 and produced the Homestake Pit and their heap leach pad operated until 1992. The land was reclaimed by 1993. I saw and it looked pretty good, if messy, and most of all it finally looked finished. Pioneer and the other miners dug the Stibnite pit deeper and created the Granite Pit. All of the mining was gone by 1996.

Then Midas (Perpetua) Co. came into town and found that the older mining had left substantial gold, silver, and antimony ore because the price for them had increased. Great, another round of stabbing the ground for its economic values, and returning to the same old pattern of digging up the ore, reprocessing it, and reburying the tailings. The mining plan says that Perpetua would like to mine the same areas that were mined in the past: Yellow Pine Pit, West End Pit, and Hangar Flats. But Perpetua's plan had a benefit to it: the Yellowpine Pit would eventually be filled with tailings on top of an impervious polyethene layer so that the East Fork of the South Fork of the Salmon River would again allow the anadromous fish to recolonize the upper East Fork. That

was a substantial gain if it could be counted on to occur.

The Role of the U.S. Army Corps of Engineers and the US Forest Service

The Forest Service's Supplemental Draft EIS on the Stibnite Gold Project includes the Army Corps of Engineers commitment to protect the water quality through section 404 (d) of the Clean Water Act. The Corps must assess "the discharge of dredged or fill material into waters of the United States including wetlands." The Corps can either deny, approve, or offer special conditions to their approval/disapproval of the permit and they must follow NEPA requirements and listen to, or pretend to listen to, the public's comments. From what I've read in the SDEIS, the renewed mining will create substantial further degradation of this most beautiful place. The obligation of the Corps is one of the most onerous tasks that it must enforce because there has been substantial damage done to the East Fork and nearby drainages over a hundred years. The Corps could say "enough is enough" and deny the permit, shutting down the project for some time. But they most likely won't do that because of the political milieu that the Corps is surrounded by in Idaho and the heavy hand that will be put on them if they are highly critical of the proposal. More likely the Corps will require that certain conditions be met before the mine can be approved. But what conditions are appropriate?

The Boise and Payette National Forests can force their primacy over the publicly owned national forest lands within the region and they can require that many things be done to justify reopening this battered drainage to remine what has sat bleeding and healing since the 1990's. (Much of the restoration done already by the State of Idaho has been responsible and effective but some of it has not. Much seemed to simply be ignored for 40 years.) There can be good and bad about reopening this hundred-year-old mess-of-messes and lessening--or at least promising to lessen--the impacts on the land, water, wildlife, and people who care about that land. But the U.S. Forest Service has no jurisdiction over the patented or private lands, that are mixed-in in the most convoluted way, to be assessed in the Modified Mining Plan that Perpetua has offered. The owners of those patented lands will have much to say about Perpetua's plan as it will affect them, unless all of the private lands have been leased by Perpetua. Have they? This mining proposal is the most complicated thing I've ever tried to put my head around in my forty years of environmental advocacy and I hope that others who are involved in this project will understand it better than I do. Nonetheless, I offer my comments on the SDEIS to the Forest Service with the sincere hope that they will make a difference in the future of Stibnite and the East Fork of the South Fork of the Salmon River.

Comments on the MMP

During water treatment in the first years of construction, the proposed treatment by movable water quality units could easily prove worthless to control the substantial sediment and chemicals that will be moving downstream at up to 300 gpm. Who will monitor those units on public or private land and what compounds will be processed or moved? Where will they be moved to and how will this water be treated?

Please do not construct any support roads or powerlines across any defined or undefined Idaho Roadless Area. Avoid the roadless areas like they were private land (and in fact they are partially my shared private land). The 72.8 miles of transmission lines are worrisome as they provide powerful Rights Of Way and provide power to places where it hasn't been in the past which could foster development of houses, and villages that pop up in a veritable wilderness. This is especially crucial near the endsites of the powerlines and anywhere near the town of Yellowpine. Electrical power brings with it the power to develop. Favor all single-pole tangent structures and a less-is-better attitude for all fiber lines built for communication. The construction crews dealing with powerlines have a habit of ignoring these concerns in many places in Idaho; but will the managers live by their commitments? Please have meetings of all crew members involved in the construction and maintenance operations for the Stibnite Gold Project for them to understand that they are trespassing on public land in a wildlife rich countryside with only the tentative blessing of a supportive public. I view these powerlines as a major trespass into a remotely visited area and that increasing civilization, such as it is, may follow and be permanent.

It would be more than a shame. All of this electrical paraphernalia that is put in for the mine should be taken out when this gold project is finished. I am glad that Perpetua feels the same way and will take all of that "stuff" off of the landscape

All cell towers constructed under this EIS or on private land should be dismantled at the time of the mine's closure.

Please plan to deconstruct the Burnlog Maintenance Facility at the end of the mine's life and destroy the water well and return the water right permanently to the IDWR. Again, I thank Perpetua for recognizing the seriousness of these seemingly meaningless facilities.

Will the waste rock be tested and monitored after being processed and bled-out for valuable minerals, for their toxic chemical content as they are redeposited in each of four places: the TSF, YellowPine pit, Hangar Flats pit, and West End pit? This seems to me one of the most critical concerns that isn't clearly described in the SDEIS.

The Forest Service and ACE should offer their three best estimates about the economic activity that the mine will experience by assuming three alternate prices of gold (High, Middle and Low prices). Those prices are key figures that will justify the collection of ore, its processing, and every bit of associated environmental cleanup. The reason for providing those estimates is that the price of gold is likely the crucial factor in gold mining and will affect the timing for the processing, the amount of digging, the transferring of the ore and overlay, the amount of processing, and the quality and amount of reclamation, among other factors. Without knowing the price of gold that miners will face, the whole EIS process is worthless because mining is nothing if not an economic endeavor.

Placing the geosynthetic liner over the tailings in the Stibnite pit, raising the level of the East Fork to its native level, and to give returning fish the ability to enter the upper drainage is a brilliant idea! It is the best idea that Perpetua has come up with in this mining process: to cover the hideous mess of the Stibnite pit that has occurred since the 1950s when the Bradly company allowed the pit to fill with water and eliminated the migration of fish up the East Fork. That was a tragedy but the fix might work! However, the tailings rock underneath the liner should be pH neutralized, the level of concentration of venomous metals (mercury, cadmium, lead, stibnite, antimony, and others) lowered to negligible amounts, and the leakage of water into the tailings should be monitored for at least seventy-five years (with a bonded action plan to fix the problem at its origin). For what it is worth, I suggest that you might put a heavy layer of bentonite on top of a sloping concrete layer that descends to a place where monitoring could be done simply for many years. I think that you need to put a catch-all basin underneath the vulnerable liner (which will leak at some, hopefully, long distant time--that's all we have is hope) and that is what the bentonite and concrete is intended to do. Those are no simple or inexpensive cures for this problem of the pit-and-the-fish but it does seem appropriate to my literary sensibilities that the cure for it is being proposed by the same sort of processes that created it.

2.4.5.6 The neutralization of chemicals and elements is unclear to me throughout this Modified Mine Plan. The public needs to clearly understand that all of the tailings that will be put into the Stibnite pit will not poison the lower drainage and the South Fork of the Salmon River. Very specifically, what kind of analysis will be done on the tailings before they are dumped in the Stibnite pit and elsewhere. What will those analyses mean to the future of the spent ore? And how thorough will the analyses be? What compounds does Perpetua expect to have to dispose of in dealing with the Legacy Materials and what will be the consequences of the aged tailings that have cooked and spoiled for 20 to 100 years? Will they offer a notion of what the new tailings may be like in 100 years?

2.4.5.7 How long will the long-term stockpiles be stored? Isn't that a function of the price of gold, silver, and antimony? If so, at what price, lets say of gold, would the tailings piles disappear and be fully processed? And at what price would the long-time stockpiles be forever deserted? What is the expected value of the gold that will keep mining and processing going toward a timely conclusion of 15 years? I hope that the containment plan will

be successful. Can you give the statistics from other similar mines showing what success the mining companies have had?

How pure will the mined lime be? Is that sufficient for the processes being proposed or is another source of lime anticipated? What is the ideal pH that enhances processing of the gold, silver, and antimony? And, most importantly, what is the final pH that the tailings would be left with prior to dumping them in a pit?

How much liquid does this process of leaching and adsorption produce and isn't the liquid a more mobile waste that should be contained? At what pH does the carbon stripping lose its effectiveness and would presumably be neutralized with lime? How much residual mercury will be sent to the TSF? How long will the TSF hold fluids before it is dry? Is there any possible problem with the electric pumps failing to work for water and wastes between the TSF and the processing center?

The MMP seems terribly complicated and full of overly positive assumptions. The plan also shows how dangerous this tailings pile might prove in the longer run in the downstream portions of the East Fork of the South Fork of the Salmon River. There are many points at which a leak might occur, such as in the geosynthetic layers, and that could change the entire SDEIS's assumptions. What assurance would the USFS and IDFG give that the East Fork will retain its wildlife and fish populations?

2.4.5.10 The temporary diversions of the East Fork of the South Fork of the Salmon River, Blowout (Ah, poor Blowout Creek! Please don't dry it up!), and Meadow Creeks sound highly dubious for a plan to mine worthless gold and silver in the heart of salmon country. I'll take fish over all the gold in the world. I guess that is my point. Regardless, the USFS must take the mining plan seriously and the ACE will do what it will with their vast discretion. At least the plan looks plausible and does pass the laughing test. However, Perpetua might add in a fisherman's path (with nice gold-painted pebbles along the bank), a rack of fine fly rods for all takers, a map for visitors from afar, and a comfortable tent site in the artificially lit stream for that Disneyland look! Nonetheless, if the agencies could show that this diversion and re-diversion to the East Fork will work, I will support it. Returning fish to the upper East Fork drainage would be worth the risk of pollution. This river has been polluted before. So many beaten drainages have been taken back from the beatings that people have given them in this country--I'm thinking of the upper Salmon River and its Sunbeam Dam, the Elwha River, and the LA River (which may yet get to a form of freedom). However, my one further request is that Perpetua assure me that the river will not be poisoned with tailing related pollution.

Restoration of the Yellowpine pit sounds plausible, but why is the Stibnite Lake created? The Stibnite Lake seems unnecessary and false in this alpine region. If the East Fork is to be restored and the Yellowpine pit will be used up within 6 or 7 years, why not begin the restoration with a finishing date of 10 years after construction begins?

All of the restoration efforts seem good in an engineering sense, but my pragmatic self says that some of it will not be done. The 40 years of water management seems unlikely to occur, although I admire your diligent engineering plans. But I will believe that the restoration will be done if the whole restoration plan is backed by a nonrefundable bond that will be immediately spent on the reclamation activities when the miner defaults or the price of gold has significantly declined.

****

A Fish Story, an allegory:

As an aside, I would like to tell the story when my best friend and I were in high school in Sacramento and came to Yellowpine, which at that point in 1972, was truly a rough-and-tumble sort of existence that my friend and I had never experienced in California. It was very exciting for us California boys to be caught up in the excitement of

Yellowpine loners and young girls when we were exploring for the Sierra Club the enormous Idaho Primitive Area in central Idaho. And, of course, there was a pretty gal, (Muriel, and she was quite wild!) that both of us had our eyes on. Doug and I saw ourselves as the consummate fishermen and we both wanted to catch a whopping salmon in the nether wilderness of Idaho, so naturally we went fishing on the East Fork of the South Fork of the Salmon River.

"Let's catch us some salmon!" Doug said.

"Sure, sure, sure we will" I said.

We were below Stibnite which we had driven around looking at the lamentable effects that mining had done to the Salmon River drainage. Doug and I went out and he cast his lure with a small trout on it that he had caught on his previous cast. "Watch this, Mike!" he said. He was very excited. He'd seen the shadow of something big.

A shark followed that little trout on Doug's line and flat-out nailed it with a big splash! "Fish on!" he cried, manily. Lookit that! It's huge." Doug said. "Fish on!" He reefed on the pole.

"Well don't let it get off!" I said, jokingly, excited for him. Kinda. Doug horsed that fish out and grabbed it with all of his might, although it slipped and nearly got back to the stream. I pushed it back out to the land, and got disgustingly slimed and dirtied by the fish that was rolling in cinders . "That's a Dolly Varden!" Doug said. That's a freakin' Dolly Varden. What's it doing here?"

"Well, it looks like a salmon." I said. I'd never caught a Dolly Varden trout. "Let's take it into Yellowpine and ask around what kind of fish it is."

"Ok, that's fine, but it's a Dolly Varden." He grinned as big as Idaho as we took it back to Yellowpine and all of the locals, well there were about 20 people in those days, appauded Doug for catching that beautiful fish. Ol' Duggie was very excited. We went in to the local grocery store looking for vanilla wafers and a loaf of whole wheat bread (which we never found). Doug was carrying that damn lunker on a stringer everywhere we walked. Some sad-sack insisted that he put the fish on the silvery dish that the main store held on its scale. That fish weighed more than the scale could measure. They clapped for Doug again and I just laughed, but was very jealous of that fish! And the way that our gal, Muriel or Mariel or some such, was looking at Doug. Jesus[hellip] He won that round. Then someone actually bought Doug a dinner and gave us an illegal--for our age was less than 18--a sixpack of Lucky Lager beer. Lucky Lager, the beer that had bottlecaps with riddles on them.

Next day, I said to Doug in our tent, "Now it's my turn to catch a big fish. Whaddya say?" Well he smiled sardonically and he couldn't say anything but "Okay, Mike but I'll catch the bigger fish like I always do." It was always like that between Doug and me. Well, to make a short story shorter. We trecked out to the East Fork and got to fishing. Right then I hooked a genormous fish on my little trout pole with its shiny spoon and fought it for about fifteen minutes before it was tired. I brought it close to shore and asked Doug to get it up on the shore. He got into the river and managed to pull it up with his hands and throw it on the bank. It was quite a maneuver! "That's a Chinook!" He said.

"Wow, a King salmon! What do you think it might weigh?" Doug picked up the gyrating fish and threw it back down. "Maybe 7 or 8 pounds."

"Not bad, eh! I think it'll taste great!" I smiled big.

"Yeah, it might. But, we can't keep it. We have to throw it back." He grinned a devils grin.

"What? You kidding? Whatddya mean we?" I said. "I aint throwing that one back! Nope, we're gonna drag it

through Yellowpine to Wild Muriel's place in the woods."

"You can't keep salmon in Idaho."

"What? Why not?"

"It's not legal. They put a bunch of dams that killed most of the salmon. Think about where that fish had to swim to get here. It's a long ways, maybe a thousand miles."

I thought about that. "Okay, okay." I thought some more. "Shit, I'll release it." I took the hook out of a corner of its mouth and reluctantly, very reluctantlhy, slid the fish back into the river. It was happy but there would be no impressing Muriel today! There was no joy in Muddville for me despite the story I told to the locals about that 18-pound fish that I let go. Some didn't believe it and others didn't care. Doug groaned. But I have the memory of that big fish that I'd caught beside the River of No Return Wilderness and let 'er go. Like a good damned boy.

Never was I so good.

You may wonder why I have included this incident in my comments on the sterile SDEIS about the mine up in Stibnite. Well, it is to remind each reader, or those few who read it, that there are vivid memories and experiences that people have had and remember to this day about the creeks around central Idaho and won't be forgotten until they die. That was one of mine.

No one is now allowed to have the sort of experience that I had 51 years ago. And honestly, it informs the reason I believe that returning the salmon to the upper East Fork of the South Fork of the Salmon River would be worth whatever the cost may be. Getting the fish up the river from the ocean and by the dams is going to be well worth it, in my view. If we ever allow it to happen. And we should.

****

Fish Resources and Habitat

The SDEIS claims irreversible losses to lamprey, salmon, steelhead, bull trout, and cutthroat trout. Impacts to these fish come from many different sources, including dams, direct loss of habitat, increased stream temperatures, and hazardous spills. (SDEIS p. 4-386). So why would we attempt to increase the jeopardy to all of them? That may be a minor factor but it is significant.

For a variety of mine-related environmental changes, stream temperatures will increase up to 6.8 degrees C (12 degrees F). This degradation does not include considering the effects of climate change, which would result in even warmer temperatures. Trout and salmon are extremely sensitive to increases in water temperature, and with the mine at the headwaters of the South Fork, there is nowhere upstream for the fish to escape the heated waters. Food may be unavailable, and fish may be unable to feed, grow, reproduce, or escape. The mine plan is but one additional increment to the problem, but the biggest of all may well be the loss of water because of groundwater depletion and larger climatic changes. What can be done about those factors?

Total Soil Resources Commitment

How will resource officials asses when the 5% TSRC has been exceeded? What mitigation or restoration will the Service apply when that 5% level has been exceeded in the patented lands as well as in the public lands. And how will detrimental soil disturbance standards be met? This is a critical issue that could be assumed away and ignored.

Climate Change

Of course, climate change is a major topic in all environmental work that is being done and so it is natural that Perpetua should mention it. However, I believe that the change that is happening is in our world is so obvious and pressing that Perpetua's comments that: "All off-highway diesel engines would be EPA Tier IV or better. Perpetua would utilize 'smart grid' technology to reduce energy consumption, such as auto dimming lights in offices" are pathetically out of touch with the scope of the issue. It might make sense for Perpetua to say that they are curtailing all use of fossil fuels in developing the project as a consequence of the global changes. If they said that Perpeuta will use electric powered hauling trucks and consolidate all of their loads, that would be a different story. If the company said that Antimony is a critical mineral for our sorry-assed world, that might also create kudos. But if Perpetua really wanted to make a difference in the global change they should tell us that they won't mine for gold or silver because of how much it drains our economy with minimal gain to any but themselves.

Wildife and Habitat

I'm concerned that wolverine, a candidate for threatened status, will be negatively affected in the Burntlog Road construction and use project. Wolverine are rare enough today and this road will affect their habitat. We are coming into a time of global climatic changes and that may additionally reduce their winter habitat. Moreover, snowmobiles and grooming trails for snowmobiles will have a negative effect on these fine, tough carnivores. The SDEIS states the SGP would result in "localized and long-term impacts to the wolverine"

Wolves are another animal that is persecuted and more roads or high intensity winter trails will surely give hunters an advantage over the wolves.

Wetlands and Riparian Areas

4.11.2.2. "Construction and operation of mine infrastructure would remove wetlands and riparian resources, impact ecological function, and fragment wetland habitat. Construction of the TSF, TSF Buttress, open pits, new roads and improvements to existing roads, transmission lines and associated access roads, borrow sites, new off-site facilities, and other surface disturbances in the analysis area would result in impacts to wetlands and riparian areas. Losses of wetland and riparian areas and their ffragmenteductions would occur throughout the construction and operation phases.

For the Johnson Creek Route the acreage of wetlands lost would be 71 acres according to the DEIS; the feet of perennial stream lost would be 21,859 ft., the non-perennial streams would lose 11,795 ft., and RCA acres lost would be 353. New roads would bisect 6 of the individual wetlands and as a result of that these lands would be biologically fragmented. The other alternatives show varying losses, but the main points that I would like to make are that these losses are significant, and they will actually be lost. The EIS has recorded those losses but hasn't defined how they will be maintained, traded, paid for, or otherwise saved in the landscape. There are no contracts made public if the agencies have worked out a plan. I hereby request those contracts. The USFS and ACE have the legal obligation to protect the wetlands and riparian areas. And fish and wildlife, for that matter. But by what means will the agencies maintain the livescape for riparian areas and wetlands? Or will they refuse to deliver the 404 permit and not sign a Decision Notice for the project?

The agencies should not accept mere funding for what Perpetua plans to destroy for the sake of gold and silver mining. Please accept only a plan to re-create real and productive wetlands where none currently exist because of other development. If they are going to have to put together a trade, put together one that would serve the critters in Idaho within a few miles of the mine project--save some frogs, trumpeter cranes, sensitive or T&E species that need wet grasslands in a nearby place. At least make it look like a real deal for some living things.

Tranportation and the Burntlog Road option

Building the Burntlog Road is far better than bringing dangerous chemicals along the South Fork of the Salmon River, however it still has significant problems that force me to support the Johnson Creek road. The first, and most important is how the agencies will control who drives on that road and who might gain permanent access or a right of way to it in twenty years. Twenty years in the future is a difficult amount of time in which to predict what political changes will occur related to use of the road. Of course, it should not be built. But what will be the impacts on the Johnson Creek Road if the Burntlog Road is not constructed? The SEIS has given me only a sense of the consequences. My opinion is that any road that is constructed to high standards will be difficult to ever de-construct, although there are many forest roads that have been decommissioned for a variety of reasons. (The agencies should restrict road use over Burntlog Road to only those who have a permit to travel that route so they have the notion that use of this road is a special favor to those in need of that route.) And of course there are many promises in this EIS that the road will be decommissioned at the end of the Stibnite project. I have a hard time believing that any of that will come to pass, given the example of the manner of which the South Fork Road was nearly eliminated many years ago until a magical blast of money and authority was passed by Congress to make sure that that road was kept open. As you are aware the South Fork road has been open and has proven to be an environmental nightmare. If the Burntlog Road road provides easier access to Yellowpine in the winter and/or summer, there will be great pressure to use it.

Secondarily, the IRAs should be left unimpaired and not cut into pieces. The Stibnite Gold Project, especially the 5.3-mile segment of the Burntlog Road high up in the Riordan Creek drainage, will impact the wilderness characteristics of the River of No Return Wilderness. Mining, road construction, and mine access will produce noise, light, visual impacts, and dust pollution that is likely to affect the wilderness nearby through direct impacts and edge effects that will degrade the area's unique ecological values and reduce the solitude sought out by hikers in a wild, trailless area, and the scenery sought by river runners.

The Johnson Creek Road is probably a more dangerous route. However, Perpetua would be pressured to make sure that no incidents occurred along that creek because of the severe damage that incidents would create and the negative publicity it would generate by spills on the Johnson Creek route. There may also be significant conflicts between Perpetua and private land owners on Johnson Creek. I don't know if those can be resolved but the environmental consequences of driving on the Johnson Creek Road could be significant. Still, you haven't convinced me that the Forest Service can retain control over the Burntlog route. It would also be in Perpetua's financial interest to continue to allow the Burntlog route to continue to exist after they have done the work of mining. The Forest Service might get the Boise and Valley County Commissioners or the Governor of Idaho to insist that that road be decommissioned, but how long will their authority be respected even if their support was gained? The Forest Service might insist upon receiving a specific bond which would be committed only to the decommission of the Burntlog Road when the needed use was finished. I don't see that happening though and, consequently, I'm supporting the use of the more dangerous use of the Johnson Creek Road unless the Forest Service can give me better certainty that the Burntlog Road could be closed and put to bed when the mining job is complete. What does the Forest Service say about this dilemna? Would they even acknowledge it?

Each stream that the road crosses provides a measureable threat to the drainages--please assess the danger of spills based on the importance of the drainage and the sort of terrain, micro-terrain, and the likelihood of gasoline or oil or whatever being delivered to a live drainage that the road crosses. Surely you have data showing the percentage of spills, near spills, and crashes that have occurred in similar riverine landscapes. Please use that data to assess the danger of a bad spill in each of the critical drainages (eg. EFSFSR and Johnson Creek and their tributaries) and weigh those dangers across each of the proposed roads that may be used for Stibnite bound chemicals and backhauls. In that way you could provide a justifiable, objective decision about road use. It now appears that you are relying on opinions and sort of a crap-shoot; an EIS and DN should make decisions clearer and the data should be gathered to advocate the best outcome.

Research Natural Areas

Please don't allow any of the values of the RNAs to be diminished or destroyed by implementing this project. Maintaining them would mean that the Burntlog Road not be developed.

Mining Activities

Perpetua is obviously making a wide variety of decisions as it mines the land at Stibnite and it is impossible for me to anticipate the way that mining machinery will work when the geology is not what they expected. Is there a place for that uncertainty to be analyzed in Perpetua's Mine Plan, as geology has some surprises for even the most adroit miner? Some of the most important factors will be the exact locations of the pits, the total area extent, the depth to which they are dug, and backfilling practices and they will certainly be somewhat flexible. In the case of needed changes, will sub-plans for variances be written and offered to the public? It seems to me that those kinds of decisions might affect the runoff and therefore the pollution of critical drainages like the East Fork. But really, I don't know.

Conclusions

Please take into account the foregoing commentary before responding to these requests.

To the Army Corps of Engineers:

1) Please consider not only the production of precious metals but also the restoration of the damaged ecosystem of the East Fork of the South Fork of the Salmon River as reasons for considering issuance of a 404 (d) (1) permit. Read the Mining Law and all of its amendments and you may recognize that that is something that the Army Corps can freely judge on.

2) Assure that the price of gold is factored into the permit, as that price will determine how much and when both the dredging and tailings deposits will occur. Each of these physical factors (dredging and tailings deposit) will determine the potential damage or restoration that will be done to the drainage. Moreover, the ACE could set a standard for the ore that is left stacked up for several years--eroding--because of its lower gold content. That could prove to be a disaster if the price of god, excuse me, of gold remains lower than expected. It might cause Perpetua to shut down and leave the piles eroding forever. Or if the price of gold were high ACE could rest assured that the job might be concluded satisfactorily. To not include the varying prices of gold in the permit should be seen by the Army Corps of Engineers as a dereliction of its duty.

3) Force Perpetua to provide bonding up-front before making rash statements like the building

To the U.S. Forest Service:

* Get the fish around the Stibnite pit as Perpetua recommends. More simply: bring back the fish.

* Is there a net gain for the users of the land around Stibnite? Please describe that.

* Collect some of the federal money that is being given to Perpetua for producing antimony and make it last for 75 years of monitoring.

* By engaging the federal powers-that-be and the State of Idaho antiquities restoration values supporters, please encourage a national monument or a state protected place around the hundred years of Stibnite mining. There is much history within the region and lots of it would be lost in the burial of remaining antiquities as all are seeking to do in Stibnite. It is not simply a place to be buried and forgotten. There are stories,

artifacts, mining equipment, photographs, places to recognize, people who have done brave things to be remembered, and many buildings that have been moved under extremely stressful conditions, and much more that should be remembered. The legacy of Stibnite should be recorded and remembered. How would the native American history be compiled about Stibnite? Stibnite would just be a place like so many other places, without the history of the past hundred years.

* Finally, please forgive me if I am crying at what has been done to Stibnite. I know, it'll get better, right?

Sincerely,

Mike Medberry