

Data Submitted (UTC 11): 1/9/2023 7:00:00 AM

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Organization:

Title:

Comments: Linda Jackson, Payette Forest Supervisor January 8, 2023

Stibnite Gold Project

500 N. Mission Street, Building 2, McCall, Idaho 83638

Dear Ms. Jackson,

I am writing to comment on the Stibnite Gold Project SDEIS. I am very concerned that the Project violates the Clean Water Act, the Endangered Species Act, and the Payette and Boise National Forest Plans. In addition, it violates the Migratory Bird Treaty Act (MBTA), which I will address.

The MBTA prohibits the killing of migratory birds and also protects their nests and eggs. The SDEIS states 1) that the "direct take of adult birds due to construction or operational activities is possible, but unlikely" but says nests, eggs and young could be directly affected (4-448), 2) that there will be "localized, short-term, long-term, and permanent, minor impacts to migratory bird species" and 3) that there will be direct impacts to migratory birds from collisions, removal of nest trees, and loss of habitat. Other components of the project that can affect birds are dust, noise, light pollution, and toxic metals in the food chain. The SDEIS states unequivocally that the Stibnite Gold Project violates the MBTA.

Mitigation measures include limiting land clearing of greater than 0.5 acres until breeding and nesting seasons are over, with the caveat "to the extent possible". The caveat guts the mitigation measure, allowing land clearing at any time. It also says that this mitigation measure "does not apply to the mine site, road construction or maintenance, hazard tree felling, or power line upgrade and construction." Allowing these activities during nesting seasons will directly impact migratory birds. This is not mitigation. Another sentence in the SDEIS (4-450) says that tree nests will be avoided "where possible". If not "possible" can the nests be destroyed?

The SDEIS further states that the SGP will not site communication towers "in or near wetlands, or other known bird concentration or high use areas, (or) in known migratory or daily movement flyways." Did the Forest Service actually do a study of high-use areas or flyways within the project boundaries? Were any onsite, seasonal, long-term studies done of bird species found within the project boundaries, or did the data regarding species come from models and incidental sightings?

During mining operations there will be toxic surface water at the site. I cannot find in the SDEIS a discussion of the potential effects to water fowl that may land in the ponds? Can you tell me where this is discussed?

At a time when bird populations are plummeting worldwide, this project does nothing but compound the problems causing their decline. How will the Perpetua Resources be held accountable for killing migratory birds? How can you allow a project that violates numerous federal environmental laws? I request that you choose the No Action Alternative.

Sincerely,

Gayle Dixon