

Data Submitted (UTC 11): 1/9/2023 11:50:21 PM

First name: Bruce

Last name: Connery

Organization:

Title:

Comments: Forest Supervisor, Forest District Ranger, Forest Planning Team

The Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Stibnite Gold Project by Perpetua Resources identifies likely problems for the lands and resources of the affect area during and following the closing of the project. This is unacceptable and the Forest Service must return to the evaluation process (NEPA) to reassess whether the project can be done with NO concurrent and long-term effects. Before the Forest Service can approve this project, it must find in follow-up reviews (DEIS) and analysis that the project can proceed because all possible degradation and pollution (i.e., release and concentration of hazardous metals-minerals, loss of fine soil particles, etc.) of streams, wetlands, the riparian areas along streams, as well as direct harm to wild animals (i.e., all animals, especially fish and insects; loss of habitat, loss of reproductive potential - output, etc.) and plants during and following the project will not occur or will be completely and full recovered. Their findings must be clearly presented in a new Draft Environmental Impact Statement that is presented to the public with plenty of time for public evaluation and input. Further Pertetua Resources should be identified as fully liable to ensure that that all safeguards and measures as identified in the DEIS and approved in the approved plan will be performed. NO mining plan should be approved unless the resources (i.e., soils, water, plant regrowth in the riparian areas, loss of fish species, loss of recreational opportunities, etc.) reported as likely to be irreversibly harmed in the current SDEIS degradation or harm will NOT be negatively effected. The Forest Service needs to return to the scientific literature, the drawing board-planning sessions, public hearings and presentations, and conferences with non-government specialists in rescoping the issues that could arise from this proposed mining activity and then analyze and assess if the mine plan can be conducted with very little or no long-term harm to public resources and lands. The current SDEIS identifies several likely harms to come to the watershed in the soils, revegetation, and recover of all aquatic and terrestrial wild life and suggests this project is unlikely to be able to live up to the stated promises of returning public lands, waters and wild life (i.e., insects, fish, birds, plants, etc.) to their full pre-mining conditions and status. It is time for the Forest Service to reverse course, begin a new and full analysis of the environmental outcomes to public resources from such a proposal, and then make a decision about the suitability of this project to be conducted on public lands.

Without a re-evaluation, the items mentioned in the SDEIS (i.e., water temperatures and vegetation restoration, transportation of at least 9,400,000 gallons and 46,000 tons of hazardous materials to the mine site, possible spills of hazardous materials into current waters and wetland habitats, decreased recreation, and much more) are likely to occur and possibly be worse. To these shortcomings, their are poorly identified access routes, a good chance the Forest Service and American Public will be stuck with a damaged and irreversibly harmed land and resources. Furthermore, the SDEIS has no project-specific spill risk calculations for number of spills and spill probability, an industry standard and NEPA requirement to disclose in carefully and properly prepared Environmental Impact Statements.

The South Fork Salmon River, all contributing tributaries and wetland areas, and the surrounding rivers are not for trashing to serve the goals-economic benefits at the expense of public lands, native plants and animals, clean waters, and unimpaired landscapes. These public resources need a more thorough review and if the project can not be completed without harm then need our full protection.