

Data Submitted (UTC 11): 1/9/2023 8:23:53 PM

First name: William

Last name: Sifford

Organization:

Title:

Comments: Dear Forest Supervisor Jackson:

My name is William Andrew Sifford and I am a United States citizen, landowner and business owner in Valley and Idaho County. I am writing to inform you the Perpetua company cannot assume the right to begin operations at this mine site anymore than I can assume that right. This SDEIS is faulty and inadequate to say the least and cannot be accepted. I'm not against all mining but this site is inherently hazardous due to its location and has all the ingredients of potential disaster from the headwaters of the East Fork of the South Fork of the Salmon all the way to the Pacific ocean. I'm informing you of my real investment in this area, my education and work experience to inform you of my decision making as related to this project. I have experience in several areas pertaining to this site but the underlying theme of my education and work experience is Prevention. From Preventive Medicine in the U.S. Army to Loss Control for the Idaho Counties Risk Management Program, ICRMP, a Property, Casualty, Liability insurer for counties, cities, and most of the taxing districts in the state of Idaho. I'll state my personal views and comments along with commenting that I agree fully with the attached form letter, I'll let that speak for itself without further repetition.

My cabin is on the banks of the East Fork of the South Fork of the Salmon River in Yellow Pine and I rely on the Yellow Pine residential water treatment system for clean water. A major impoundment behind a proposed dam with a liner that cannot be guaranteed, with waste buried beneath that liner that will leach heavy metals and pollutants forever is an imminent fail in time. Threatening springs and surface water downstream, my drinking water in Yellow Pine included. My property line goes to the high water mark of the river. I watch the river from my front porch. That view is priceless. This is my stomping grounds and my cabin will remain in my family for my descendants to enjoy. Mining would destroy everything that makes this place so special. What studies have been conducted that would trace the water leaching out of the proposed mine disposal pit onward from the pollution source to its eventual ending point, ie does it go to a static water table or resurface? Has there been a baseline water quality study performed on that leach water below the source. What real time water monitoring has been proposed for this site for detecting leaks in surface water, ground water and stream water. What baseline measurements have been taken by a third party to confirm the existing pollution levels of related pollutant materials that are to be mined in the future? What biological studies have been conducted on benthic organisms to determine present diversity of organisms and levels of pollutants within that benthic population for comparison in the future.

I'm also a landowner at 901 N. 2nd Street in McCall Idaho. I purchased the property prior to improvement made by the city of McCall as a residence. Within a year after the purchase the city of McCall invested approximately \$8.1 million in the four square blocks in which my residence is located. Thus my primary residence is highly valuable as a commercial property and I have had investors comments it is the most highly prized development property in downtown McCall. I purposely chose this location because of its convenience to all the perks of living in the city with a beautiful view of Payette Lake and I have heard values of \$2.5 million for this property. I have made an investment here and the City of McCall has invested, with great public uproar; so how is it justifiable according to our third party Economic Impact assessment that all this investment could go to waste. Where is the Economic Impact evaluation from the Forest Service or a third party, without financial interest in the outcome, that would make whole the investments of this community when the failure of this mine occurs. There is a great deal of wealth that has come to this community in recent years that could disappear. My real estate broker has tens of millions of dollars in future contracts in McCall, who and how will this loss be made whole?

I also own commercial property on the Lower Salmon River in White Bird Idaho; Swiftwater RV Park 3154 Salmon River Court. My property line goes up to the high water mark. Virtually all of my business depends on

fishing, hunting, hiking, four wheelers, whitewater rafting, jet boats and jet skis, virtually the complete package for outdoor recreation in Idaho. People visiting my park are visiting Hells Canyon, Gospel Hump Wilderness, Snake River, Salmon River; some just stare at the Salmon River all day. Visitors at my park stimulate the economy in White Bird, Riggins, Grangeville, and Lewiston. My RV Park has guests from all over the United States. Since the Covid travel restrictions were lifted we have guests from Europe and Canada as well. One pollution event can travel fast in mass media and the effect on my business and virtually every business in the Salmon River Canyon Chamber of Commerce would be negatively impacted, many of which are operating in a tight rural economy. My investment in that business would be in great jeopardy if the Stibnite Mine Project is approved. All of my business investment and potential would go down to nothing if even a small chemical spill hits any portion of the Salmon River or its tributaries and the media reports it. Who would monitor the chemical spills, large and small, to assure all spills are reported and how equipped is the emergency response team? While working with ICRMP human error caused by alcohol and drug abuse can be the source of many accidents. What specifics can you provide so that an onsite third party conducts a safer environment where substance abuse is not a problem.

When an actual Economic Impact Statement was funded by private citizens, myself included, and conducted by a third party economist at a cost of \$25,000, made relative to the Economic Impact the Stibnite Mine would have on existing recreational economy the value on my property would take a substantial negative hit in value. The recreational economy in Idaho is equivalent to agriculture. All three of my properties are threatened by the existence of this mine and at some point in time are going to suffer a great economic loss if Perpetua or any other mine is allowed back in proximity to this drainage. All three of these properties are for the inheritance of my family and threatens their livelihood in the future as well.

I have a B.S. in Environmental Health with a prior education in Fisheries Management/Wildlife Biology. I have worked on a commercial fish farm restocking live fish for stocking waterways and I know what can kill fish. On my own farm I lost 10's of thousands of bass due to high temperature and low water due to drought and unusually hot summers. While in Idaho I exported Smallmouth Bass to Japan and only lost one bag due to a leak, shipping them from Seattle to Japan, I know how to keep fish alive. The Japanese were impressed with their delivery. Perpetua is proposing to withdraw 20% of their water from the East Fork of the South Fork and I know this will increase temperatures and kill fish and the food they require to prosper. How do I start the process of withdrawing the water out of the river following my assumption I have the right to do so?

My coursework at Boise State University included studies in Water Quality, Air monitoring, Hazardous Waste, Public Health Law, Microbiology, etc. At Kansas State University I studied limnology, Fisheries Management, Cell biology, Organic Chemistry etc. My educational background familiarizes me with the science of this SDEIS. My work background working with different species of live fish from the hardy to the sensitive species qualifies my opinion. I have surveyed the tributaries of the Salmon River as a student surveyor with the U.S. Fish and Wildlife Service using the Instream Flow Increment Methodology and have associated with other scientists in related fields during that study. I was a project manager for an asbestos removal oversight company and have done personal air monitoring and area air monitoring on asbestos removal projects. I have also consulted to private manufacturers to perform air monitor and safety surveys to maintain compliance with OSHA. I have been a QA/QC technician in an EPA wood smoke project in Boise checking air flow and filter replacement on contemporary equipment provided by Research Triangle Park in North Carolina. I know what a wind rose is. I have trained employees in the use of Respiratory Protection in hazardous environments. I am aware that pollutants contacted on the job can be transported with clothing and equipment outside of the source environment affecting the community.

There are many business depends on fishing, hunting, hiking, four wheelers, whitewater rafting, jet boats and jet skis, virtually the complete package for outdoor recreation in Idaho. People visiting my park are visiting Hells Canyon, Gospel Hump Wilderness, Snake River, Salmon River. Visitors at my park stimulate the economy in White Bird, Riggins, Grangeville, and Lewiston. My RV Park has guests from all over the United States. Since the Covid travel restrictions were lifted we have guests from Europe and Canada as well. One pollution event can travel fast in mass media and the effect on my business and virtually every business in the Salmon River

Canyon Chamber of Commerce would be negatively impacted, many of which are operating in a tight rural economy. My investment in that business would be in great jeopardy if the Stibnite Mine Project is approved. All of my business investment and potential would go down to nothing if even a small chemical spill hits any portion of the Salmon River or its tributaries and the media reports it. Who would monitor the chemical spills, large and small, to assure all spills are reported and how equipped is the emergency response team? While working with ICRMP human error caused by alcohol and drug abuse can be the source of many accidents. My loss control experience suggests this has a huge property- casualty- liability potential. What specifics can you provide so that an onsite third party conducts a safer environment where substance abuse is not a problem? What type of assurances/insurances have been provided so that Idaho taxpayers and US taxpayers aren't strapped with the bill when these hazards cause damages?

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and accounted in their study the Economic Impact Statement that the local business group has conducted. The burden put on the Idaho taxpayers with little to no return on that investment is akin to colonization of this area by foreign imperialists. Our water, land, power, air and infrastructure is being used at no cost with extremely little benefit to this area. Minimum Effort Perpetua is proposing to undermine the stability of our local economy in a time of climate caused drought. I've lived through that and its a disaster. They want to do this with little ability to be accountable to local citizen interest. I have no confidence in this plan and vote that we have no action in this area and refute the assumption that Perpetua interests supersede the best interest of the local area and the nation, especially in the Northwest. At the very least an 90 day extension in the commenting period should be granted. I agree in all respects to the letter provided by Idaho Rivers United and the Idaho Headwaters Economic Study Group.

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed at the headwaters of the South Fork Salmon River watershed. As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples of the area.

The SGP will have adverse effects on Chinook salmon and bull trout. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk and flies in the face of this investment and effort to restore these species to a sustainable population. Stream temperatures are predicted to be elevated for up to 100 years within the mine site boundary and the habitat for these sensitive species will be for the worse, not better, as a result of this project.

As proposed, this project will result in the loss of over 120 acres of high-functioning wetlands. It will negatively impact the general water quality of streams found within the site from additional sedimentation and the potential release of additional contaminants mobilized by mining and construction.

Although Perpetua prefers to present the SGP as a 'restoration' project, it is a massive industrial mine that will leave the landscape unrecognizable and degraded for lifetimes to come through the creation of three open pits, the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat, and an expanded footprint that more than doubles the previous disturbance of the Stibnite mining district.

The effects of climate change will exacerbate the impacts the SGP will have on the environment and were inadequately incorporated into the SDEIS. While briefly acknowledged, the compounding impacts of a warming climate were not taken into consideration when predicting stream temperatures or other environmental impacts that are intrinsically linked to the climate.

Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County, but there are no risk analyses on local communities if a hazardous spill were to occur and the potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service.

As proposed, the SGP raises numerous concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). The project itself is located at the headwaters of the suitable South Salmon River, which feeds directly into the designated Main Salmon River. However, the scope of analysis does not include any potential impacts that extend downstream of the site boundary to review these sections of river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if this project moves forward.

Recreation, in any form, within the general area of the mine will be negatively impacted. The analysis of impacts on recreation is arbitrarily limited to a 5-mile radius from major mine features and does not include any discussion

of traffic displaced to the South Salmon Road and Lick Creek Road that will logically result from this project.

Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho. 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".

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan."

Yours cordially and with due respect on 1/09/2023

William A. Sifford (Bill)