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Comments: My Interest in the SDEIS for the Stibnite Gold Project (SGP)

McCall, Idaho has been my home since 1995. I love this area primarily because of the beauty, the unpolluted, and little populated nature of the environment. I am married to a retired USFS District Ranger. My recreational interests include hiking, and backpacking in the country surrounding McCall, and the less populated and wilderness areas of Valley County. I have made numerous visits to the Stibnite Mine site and the surrounding country over the past 25 years. I am not a scientist or economist that can give you technical substantive comments. My degree is in philosophy, so I will offer a philosophical comment that I hope will be taken no less seriously.

I am very concerned about the environmental challenges we face in the twenty-first century, such as climate change, habitat loss leading to threats of extinction and actual extinction of plant and animal species, pollution of air and water reducing quality of life or continuation of life itself for plants, animals, and humans. These concerns are foremost in my mind and I believe they should be foremost in the minds of all people as these are the truly existential threats at this period of time.

Value of the SGP

The mining of gold at the Stibnite mining site is simply an economic pursuit, just as any economic pursuit. It is not essential to our continued existence. Further extraction of gold is not needed by society in general. It is a commodity that would benefit a relative few individuals financially, but add nothing to the well-being of our society in general. Gold that is needed for industrial uses is available from existing sources without extracting more at this time.

The mining of antimony at the same site is considered essential for defense because it is a mineral used in munitions and currently is not mined elsewhere in the United States. It is my understanding that there is also no domestic plant for processing antimony. Without a way to process the mineral domestically the strategic military advantage of extracting antimony domestically is lost.

Is there political pressure placed on the USFS to approve a mine that otherwise would not be approved because the Department of Defense has offered to award the mine \$24.8 million to mine antimony? One branch of the government should not be able to usurp power from another branch in a time of peace. I don't believe that the threat of war (of which there is none at this time) and our ability to meet such a threat outweighs the very real threat of climate change.

Historical Perspective

I argue that the considerations for approving the SGP are based upon obsolete needs. The mining law of 1872 provided for the needs of a developing country and a developing economy. At the time the law was written, industrialization was on the upswing and had become a prominent sector of the American economy. In the twentieth century, industry matured and peaked and in the later half of that century information supplanted industry as the prime sector of the economy. Now, we are in the twenty-first century and continue to approve projects that were needed in the 19th century, less so in the 20th century, and arguably not at all presently.

Two centuries of industry have left us with a polluted environment and a warming climate. Species extinctions today are on a par with global extinctions from the prehuman past caused by catastrophic natural events. Rising sea levels are displacing millions of people. We are threatened with global food shortages due to climate change and polluted soils and water. The overarching need in this century is to mitigate the environmental impacts of the past two centuries of industry.

Environmental Impacts

The forest service's task now is to consider the environmental impact of this project. Other, more qualified commenters will quantify the projected negative impacts to the water and thus the salmon of the South Fork of the Salmon River pouring into the Snake and Columbia Rivers and the ocean. Air pollution from the mining activity at the site will be created as well as pollution from the added vehicular traffic associated with the added activity (bringing supplies, transporting ore, etc.) All of the unnecessary activity of this project, using internal combustion engines burning fossil fuels will contribute to climate change. Perpetua Resources' claim that their mining activity is necessary to "clean up" the site from previous activity is not genuine. In fact, the company proposes to create a much larger disturbance of soils and landscape than currently exists.

In short, the actual needs of the 21st century, to reduce pollution, reduce global climate change, and mitigate habitat and species loss, cannot be enhanced by the SGP, but will be diminished if the project goes ahead.

Impacts to Native Peoples

The SGP is within treaty-protected land of the Nimiipuu (Nez Perce) tribe. Mining at the site will interfere with the use of that land by the rightful owners of the land, and will interfere with the safety of endangered salmon of the South Fork Salmon River, also protected by treaty.

Economic Impacts

The company (Midas Gold and now Perpetual Resources) has promoted the project as an enhancement to the local economy, but the independent economic study by the Idaho Headwaters Study Group, An Evaluation of the Potential Socio-Economic Impacts of the Stibnite Mine on Valley County, Idaho, (<https://studystibnite.org>) concluded that the impacts of the project would be, on the whole, detrimental to the county's economy due to reduced attractiveness of the area for tourism, additional burdens to infrastructure (roads, schools, etc.), increased housing costs, additional burdens to services (fire, law enforcement, etc.) as well as other impacts.

Conclusion

The SGP, if allowed to proceed, would feed the greed of a few individuals at the expense of the economic interests of the surrounding communities, the attractiveness of the local area, the treaty rights of indigenous peoples, and most urgently, the environmental health of the area. As the environmental health of each local area is diminished, the environmental health of the entire planet suffers. Projects for the 21st century that should be approved are those that are engineered to restore lost habitat, mitigate climate change, and improve the quality of water, air, and soils. This mine would do the opposite of all that. I urge you to adopt a "No Action" alternative to the SDEIS of the SGP.

Thank you for your consideration,