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First name: Karen Last name: Drake Organization:

Title:

Comments:

First, there has been inadequate time allowed for responses to this SDEIS. An extension has been requested and still should be granted, for others to submit their responses to a plan of this complexity and length. Especially for regular Idaho citizens, who have other day jobs and don't speak the lingo, it takes longer to digest and synthesize our responses.

As a long time resident of Warm Lake, I believe the Stibnite Gold Project Supplemental Draft EIS remains vague and inadequate in multiple critical areas, and the project itself remains too risky and detrimental to the interests of the public at large. The existing data seems overwhelming focused on the justification and decision between the alternate transportation routes (Johnson Creek vs. Burntlog Road) but lacks appropriate analysis beyond that topic and beyond the immediate mine impact area. I am especially concerned about the lack of analysis in the SDEIS of impacts specific to the Warm Lake region. Warm Lake is not immediately adjacent to the Stibnite mine, however, it is within the affected area, but excluded from much of the analysis, monitoring, and mitigation measures.

For example, due to the constricted canyon and topography between Landmark Summit and Warm Lake, any accidents occurring from travel by heavy vehicles carrying hazardous materials down Warm Lake Road would all wash toxins into Warm Lake Creek and flow into Warm Lake itself. The current SDEIS analyzes the risk of roads/traffic within 100 feet of critical streambeds, however, that analysis only includes the area of the two competing routes (Johnson Creek vs. Burntlog Road). i.e., It acknowledges 1.69 miles of risky roads within 100 feet of streams on Burntlog or 6.5 miles for Johnson Creek, but that excludes the roads and watersheds further from the mine, notable down Landmark Hill, much of which is also adjacent to streams. Are these not also miles and watersheds of critical concern? The SDEIS does state that toxic spill impacts to fish should be 'minor, localized and long-term'. However, I would challenge that any for any spill along the creek down Landmark Hill, "localized" would still wash down to the inlet to the lake. And when we have multiple fish species endangered or threatened, any 'long-term' degradation - major or minor - is completely unacceptable. This is a material SDEIS omission of significant scale. Simply choosing the lesser of two evils between Burntlog and Johnson Creek does not absolve Perpetua from the huge problems inherent with the rest of the plan.

Additionally, only spill-related accidents closer to the mine are included in this DEIS at all. With hundreds of thousands of truck trips over the life of the mine, vehicle accident calculations should also be analyzed along the Highway 55 corridor. This winding highway has extremely limited passing ability and this additional traffic will negatively impact public travel safety exponentially. Attempts to pass slow trucks will result in collisions with passenger vehicles, and deaths. No analysis or mitigations are proposed for co-mingling with heavy passenger traffic. Has there been any calculations for the estimated accidents and death to the public along ID-55.

The SDEIS lightly discusses noise but uses limited information and faulty averages and comparisons which serve to minimize this significant issue. The SDEIS needs to include actual measurements of the specific vehicles traveling and braking on the steep roads such as Warm Lake Road, especially adjacent to campgrounds and communities. This is an area where the noise will greatly impact the public experience. Additionally, the baseline measurements nearest Warm Lake do not provide adequate information for comparison. Warm Lake is known as an incredibly quiet environment, although it does have an active power boating population primarily on summer weekends, only from 11-6, however the vast majority of time it is incredibly quiet and peaceful. Noise from constant Perpetua trucks should not overlap those quiet periods.

I recognize the PR spin that Perpetua has effectively touted about improving an existing damaged ecosystem

and providing minerals and antimony for green energy and military needs. However, all of those issues are as much P.R. as reality. While they will undoubtedly clean up some of the former toxins from prior mining, the enormous scope and length of the project will create untold new problems, many of which will be left for future generations to deal with and pay for. And although clean energy and antimony are a real need, there aren't current plans or options to retain and process the antimony within the US, thus we have little guarantee that giving up this precious mineral would provide any value to anyone other than Perpetua and whatever country ends up bidding for it.

An EIS is required to analyze ALL environmental impacts related to the activity, alternatives, and identification of mitigating actions to reduce or remedy any adverse impacts. This SDEIS remains incomplete without addressing the multiple issues related to the Warm Lake area. Even ignoring Warm Lake, the project as a whole acknowledges long term and unmitigated damage to both fish and wildlife habitat. Because the Stibnite mining project cannot meet the requirements of the existing Forest Service Plan, the SDEIS states that F.S. plan will be rewritten to accommodate the needs of the mine. What an interesting solution. As a Forest Service recreation residence permit holder, I'd like to respectfully request that the Forest Plan also be rewritten to accommodate MY needs, as I, too, have found it painfully restrictive.

Protect this area. Its true value - its worth - is much greater to the citizens of this state and this country than the value of the gold and minerals planned in an environmentally destructive extraction, for the financial benefit of foreign company. I do not believe the permits should be approved.