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Comments: Thank you for the opportunity to comment on the SDEIS for the proposed Stibnite Gold Project. In reading through some portions of the study, I identified the following areas of ambiguity or omission that still have me concerned with the EIS.

There does not seem to be any analysis of the impacts of habitat fragmentation associated with the burntlog route. The estimated acreage of vegetation clearing and direct habitat loss is provided, but there is not any sort of quantitative analysis of how large game in the area will be impacted by the construction and usage of a new road through an otherwise seldom traveled region. The wildlife impacts of establishing a new groomed OSV route (Cabin/Trout creeks) also appear to be unknown and unstudied. The OSV trail adjacent to Johnson Creek Road should be adequate to replace the existing Warm Lake-Landmark trail and the proposed Cabin/Trout creek route should be put on hold.

The hypothetical fish tunnel continues to be unsupported by research or examples. Before considering that this maneuver will protect the population of endangered species, we need to see convincing evidence that it has worked in other locales for the same species in similar habitats and life stages.

Measurable criteria for allowable dust on roadways due to mine traffic must be established.

It is not clear that the design of the TSF drainage during operation is capable of managing the 24-hr PMP event if water quality requires treatment at the ore processing facility. Either the design needs to include containment or the OPF must be capable of processing the entire outflow of a high rainfall event.

Haul road impacts on fish-bearing streams need to be more thoughtfully evaluated. The road width is identified to be approximately 90 feet, which poses significant engineering challenges to incorporate fish passage in culvert design. These designs need to be clarified and their efficacy validated before project approval, and haul road/fish passage conflicts need to be specifically identified.

A dam breach analysis is missing. In open pit mining projects, it is customary to perform a hydraulic analysis of the extent and severity of downstream impacts in the event of an unexpected failure of the TSF buttress and any barriers for holding ponds. I didn't see any indication of these analyses and a search of the SDEIS document for "Dam breach" yields zero results. These analyses must be conducted for all stages of operation and construction.

To support ongoing monitoring of downstream impacts during operations, we need to see a more comprehensive deployment of real-time monitoring stations for discharge, sediment load, and water quality variables.

Evaluated alternatives do not include a simple, low-tech, focused restoration project, whereas action alternatives eliminate the possibility of such a restoration in the next fifty years and forever in the case of Meadow Creek. The interference this project would play in future restoration of Meadow and West End Creeks needs to be acknowledged and quantified. Part of the no-action alternative includes possible channel restoration in the future.

It has been suggested that Perpetua operations near the site have already forced extended closures of recreational access to public roadways in the area of the project which are omitted in the SDEIS section on impacts to recreation. It needs to be explicitly stated in permit issuances that no closures beyond those articulated in the SDEIS will be tolerated.

Figure 2.4-18 indicates Meadow Creek will be "restored." The TSF is expected to be a fish barrier and will be a permanent disruption in natural geomorphic processes. The word "restore" and its conjugations should only be used in reference to areas that will be restored to pre-mining conditions. In the case of Meadow Creek, this includes access to spawning habitat for Chinook Salmon.

The bonding of the project is expected to cover reclamation costs, but it is possible the financial assurance will be insufficient. An additional alternative must be investigated: mid-operation bankruptcy of Perpetua Resources and abandonment of the project.

The closure plan for the West End pit seems to be little more than putting some boulders on the road to keep cars out. Despite all the talk of restoration, this project as evaluated by the SDEIS would leave an imprint larger than the current condition, just in a different place. The impacts of this closure plan need to be much more rigorously documented, including consequences of leaching stagnant groundwater through the bottom of the pit into surrounding fish habitat and impacts on wildlife creating this hazard without re-grading the surrounding area to support natural hillslopes.

Acceptable impacts on wildlife during the project are vague and open to interpretation. E.g. "Perpetua would implement an animal trapping and relocation plan, as necessary, for nuisance species for safety of staff, visitors, and animals." The plan needs specific, accountable tolerances laid out before approval.

Hydrologic model predictions for streamflow at different sites show significant decreases in stream baseflow for the action alternative. What is missing in this is context. These impacts should be further reported according to habitat suitability and survivability models for critical riparian species such as macroinvertebrates, bull trout, and riparian vegetation.

The proclivity of shortcomings in this EIS are a clear indication that an additional draft is necessary for a public comment period before it is considered final.

Thank you for your thoughtful consideration of the complex issues at play. I look forward to seeing a more rigorous EIS in the future.