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First name: Meg
Last name: Lojek
Organization:
Title:
Comments: To Matt Davis, Forest Supervisor, Payette National Forest

Re: Stibnite Gold Project

As stated in my 2023 Comment Letter 17166, the Forest Service has failed to adequately analyze the proposed mine's effects to birds, fish, socio-economic quality of life issues, and climate change.

In response to the apparently general treatment of my comment, the FEIS at Appendix B, page B-729 said, "no further response required."

This is inadequate because of the Migratory Bird Treaty Act and Executive Order 13186. The arsenic unpredictability and increased levels of mercury will adversely affect migrating species, and the Forest Service statements have failed to address this reality of potentially killing migratory birds. I submitted comment regarding the lack of adequate effects analysis, but the FEIS has not taken a "Hard Look" at multiple issues, in violation of NEPA.

The USFS "no comment" is also inadequate because of the impact to 3 endangered species, the Chinook, Bull Trout, and Steelhead.Chemical spills, increased water temperatures and fish tunnels will all seriously injure species that are already considered "endangered" -- which is an official legal designation by none other than the US Government. The FEIS says all 3 endangered fishes will have decreased population. The mine would increase arsenic and heavy metals, which will decrease fish habitat for Chinook, Bull Trout, and Steelhead. The SDEIS stated a 40% reduction in flows in tributaries--this is not something that Endangered Species can survive. The USFS would be breaking US law by allowing this to happen. "Restoring the site" must include revegetation of these streams, but we all know that in the rough, dry soil of that area, revegetation would take at least 100 years to even begin cooling the waters. Have you studied that yet? The public has a right to know this, and I believe the current impact statement does not address these facts. It is deficient.
Regarding the preposterous fish tunnels (as yet untested for such a length), where are the alternatives we should require of Perpetua? Their tunnels are untested and unproven. They read like something Dr. Seuss would invent in a warning book about "truffula trees"! USFS should ask THEM for alternatives and tell us, the public owners of public lands, if the alternatives would be better.

Furthermore, by not commenting on my letter, you have failed to analyze the full impacts of climate change. As I stated in my previous letters, the current analysis fails to address the exponential increases in its modeling. When local emissions are predicted to DOUBLE, this will be a huge impact with exponential repercussions. How much? How will that affect our fish, our birds, our air quality, our propensity to wildfire? How will that exponential increase change the ability to revegetate the area in a reasonable amount of time? Why has the USFS not analyzed this? Why are you seemingly taking the word of the hopeful mine companies when they say they can lower stream temperatures, when instead your modeling should be able to prove it. We cannot legally ignore these impacts. For example, in the cited 40% reduction in stream flow is based on current or historical flows. As climate change continues, what are the predictions on flows? Please include that in the modeling so we have a complete picture -- one that certainly will be more than a 40% reduction as local temperatures increase and snowpack and rainfall are affected.

The final concern of my letter that you have not addressed is the socio-economic impacts. Where is the analysis of traffic, housing, hospitals, schools, fire, police and other essential services? As it is, we cannot hire enough people to work in our schools, and we are importing nurses and begging doctors to work here. We lack personnel

for emergency departments and emergency crews to respond to the inevitable and remote crashes, spills, and emergencies that come hand in hand with even the best foreign-planned mining operations. Local communities will suffer irrevocably, and that information is lacking in your response to my letters. Where is the analysis of Highway 55? Idaho Power and electric usage? Public safety?

In short, your statements and lack of addressing my specific concerns is deficient. The USFS must take a hard look at all reasonably foreseeable direct, indirect, and cumulative effects. By law, the USFS should remedy this error by withdrawing the FEIS and not issue any decision or take action based on these and many other inadequacies. The revised FEIS must adhere to every law, regulation, policy, Treaty and requirement.

Thank you.