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Comments: Stibnite Gold FEIS
Forest Supervisor Matt Davis, Payette National Forest
Comment # 17598
Here are just a few of my concerns with the go ahead given to the large, industrial mining company named Perpetua at the headwaters of the East Fork of the South Fork of the Salmon River.
As stated in my comment letter, 17598, the need for water to process the mined ore at the SGP far exceeds the amount of water there is. Page ES16 of the DEIS briefly describes how ground water levels will drop for long periods of time and in some cases 'forever'. Surface water from the streams will be heated up then used up. The Forest Service response to this comment was, 'no further response required…'
This is inadequate because ground and surface waters are major issues. The FEIS on p1-32 shows no change in plan to the mining operation from the SDEIS to the FEIS. This is a Perpetua problem that in my view the Forest Service is not giving adequate consideration to.

Also stated in my comment letter, 17598, from ES 16, 259 acres of occupied whitebark pine habitat would be removed resulting in the loss, as in cutting down and destroying, 1236 ancient whitebark pines trees. Since whitebark pines are keystone species, whole ecosystems will be fragmented and degraded by this loss. Under the ESA 2022 ruling, whitebark pines are listed as threatened. When I looked this up I found that 'The protections for whitebark pine also make it illegal to remove, possess, or damage the tree on federal lands', (Joe Szuszwalak,USFW Dec 2022) I do not see how Perepetua is above abiding by this law. The FEIS also states that the SGP would result primarily in localized, long-term and permanent, moderate impacts to the whitebark pine. How is this acceptable or even legal?
The Forest Service response to the question of whitebark pines was that no further response was needed and that the Forest Service is finding the best possible balance between industry and environmental protection. This answer, to me, is not specific enough considering the listing of the whitebark pines.

Another concern from my comment letter, 17598, is the large number of acres that will be scraped of all vegetation and organic material and will never be able to support vegetation again. There is nowhere near enough topsoil to support healthy plant growth after mining. These issues were pointed out in ES 11. The Forest Service response to this concern was 'general in nature' and did not need 'further response'
If restoration after mining is part of the requirement of the mining company, these concerns are valid and need a detailed response as to where the growing media and topsoil to cover the necessary parts of the mine site are going to come from and will they, in the long run, support plant life?
I have listed just a few of my many concerns and how I, as a member of the public whose lands are being considered, am not at all satisfied with the Forest Service's response to my comments. Experts in these environmental reviews and decisions advise that the Forest Service withdraw the FEIS and DROD and not issue any decision or take any action based on an inadequate FEIS. This is a huge, industrial scale project, many times larger than past mining activities at Stibnite. Many of the impacts are irreversible. The headwaters of the East Fork of the South Fork is not a good or safe location for Perpetua's mine.