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Organization: Idaho Headwaters Economic Study Group IHESG
Title: Board Member
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To: Reviewing Officer, Stibnite Gold Project

Subject: Objection Letter to the Stibnite Gold Final EIS

As stated in my Comment Letter, 17737, September 6, 2024, The SDEIS states in Section 4.21.1, page 4-593 that "Social and economic conditions were analyzed using the Economic Impact Analysis of the SGP (Highland Economics 2018). It is important to note that this study was conducted for Perpetua Resources by the consulting firm Highland Economics. In the Executive Summary of that study, it clearly states "we did not evaluate potential economic impacts due to possible effects of the SGP on other economic activities, such as the recreation or tourism industry". This obviously reinforces the Power Study observation that the SDEIS presented a "benefits only analysis ". Furthermore, the analysis in Section l. of the Power Study provides data and details for how "Valley County's productive economy is built around visitors and the recreation experiences they seek". The Power Study goes on to demonstrate how the proposed SGP will put this robust economy at risk and how the SDEIS does not take a hard look at these risks.

In response to my comment, the FEIS at Appendix B-page B-567 responds:

The SDEIS analysis concluded that there would be minor to moderate effects on recreation resources with the exception of Over-Snow Vehicle trails where temporary trail closures and relocations would constitute a major effect. Minor to moderate effect determinations were based in part on the Project's existing condition as an unreclaimed historical mine site, where current recreational use of the site is limited and there are alternative locations within the area

for recreational use.

The Forest Service FEIS did not adequately respond to my comment. In fact, it missed the mark entirely. As reported in the Power Economic Study, Valley County is outperforming the national economy, as well as Idaho non-metropolitan (rural) areas, across a road range of indicators. These positive economic trends over the past half-century in Valley County were not driven by the expansion in mining and forest products. Valley County's productive economy is built around visitors and the recreation opportunities available in this beautiful place. According to the Power study, the economic risk of an industrial scale mine like the one proposed by Perpetua may not be worth the short-term gain. There is a very real potential that the proposed mine will impact the character of Valley County, hence our economy, due to do degradation of natural amenities. As pointed out in the Power study, any mine employment economic benefit could be almost completely wiped out by even a 2%

decline in the visitor-recreation economy due to degradation of our water quality, our air quality, and the natural landscapes due to pollution and industrial accidents. According to a review of 27 modern gold mining operations in the U.S. by Earthworks, (Missoula, MT), accounting for 93% of domestic production, 100% experienced at least one pipeline spill or other accidental release of cyanide, diesel, tailings or ore concentrate. I don't believe the Forest Service has completely investigated the unknown costs of this mine to the Valley County economy which is already robust and accelerating due to this visitor recreation economy.

The Forest Service must take another look at this inadequate FEIS.

Deb Fereday

IHESG Board Member