Public Comment Submittal from Tami Thatcher on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement, by United States Department of Agriculture and US Forest Service, undated dSEIS released October 28, 2022.

Submit Electronic Comments To: https://www.fs.usda.gov/project/?project=50516

The stated deadline is January 10, 2023

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Project Website: https://www.fs.usda.gov/project/?project=50516

Summary

The Stibnite Gold Project (SGP) is an expansion of pit mining at the Yellow Pine mine area east of McCall, Idaho and it is a huge expansion. I oppose the expansion of any new pit mining in the Stibnite Gold Project area, where the Yellow Pine pit and Meadow Creek mine had already created enormous environmental devastation.

Even if everything goes as planned and there are no accidents or catastrophic tailing dam failures, this expansion of open pit mining at the Yellow Pine Mine and of enlarged tailings dam disposal at the Meadow Creek area will remove miles of forest and wet lands. And it is hoped that the expanded mining will perhaps not poison creeks and groundwater much above existing levels of contamination of toxic antimony, arsenic, mercury, lead and cyanide, etc.

It appears that about 100 years of mining experience that poisoned the creeks and groundwater at the proposed Stibnite Gold Project, of mining company abandonments, of careless attention to where or how mining waste should be disposed of to prevent harm, and how diverted creeks and tunnels rapidly failed, has taught the Forest Service very little. The last thirty years of attempted remediation of the contaminated groundwater, creeks, various tailing locations also seem to have taught the Forest Service very little.

Optimism abounds in the Stibnite Gold Project Environmental Impact Statement. Mining that in the past was perhaps 2,500 tons per day is proposed that will be conducted by Perpetua Resources at 20,000 to 25,000 tons per day. What could possibly go wrong?

Where perhaps 5 million tons of ore mined and processed created substantial environmental devastation at this Yellow Pine Mine and Meadow Creek Mine, why not mine 112 million tons of ore, and … hope for the best?

The Forest Service is dangling the optimistic thought that the new, the latest mining company, Perpetua Resources, won't be like the rest and that 100 years of inadequate oversight by the Forest Service and the State of Idaho doesn't mean anything. And the Forest Service is dangling

the possibility that some very modest remediation might actually be done by Perpetua, Resources, to address the toxic waste, waste that lasts into perpetuity.

After all, the Forest Service, is saying that 0.3 million tons of rock or tailing could or would be moved around by Perpetua. And the contamination levels are already so high that the Forest Service assumes that no one will live there permanently and drink the water. And forget about fish, the Yellow Pit Mine, the past creek diversions and poisoning from mine tailings waste finished that off any hope of natural Chinook salmon returns decades ago.

This draft supplemental EIS aims low from the very beginning. The Forest Service states that it will approve Perpetua's development of the Stibnite Gold Project "to mine gold, silver, and antimony deposits that, **where feasible, would minimize adverse environmental impacts** on NFS [National Forest Service] resources…" [emphasis added]

Unless the proposed tailings storage facility and its buttress, are adequately designed and also properly constructed, and the thin liner is installed properly and no liner failure occurs over millennia to prevent saturation of the tailings, the situation could become far worse than the existing toxic mining mess.

The liner may sound good, but hasn't experience shown liner failures quickly, perhaps within 1 year?

Part of the enticement is that this expanded open pit mining that Perpetua proposed will kindly remove and reprocess 3.2 million tons of historical "Bradley" or "Bradley Mining Corporation" tailings waste. This is in exchange for generating an additional **112 million tons of new tailings waste.**

So, instead of impounding 3.7 to 4.2 million cubic yards currently impounded Bradley tailings, the proposed Stibnite Gold Project will house 120 million tons of tailings waste, and increase the tailing waste impoundment size by 405 acres to a total of 423 acres. No longer 45-ft high, the tailings waste will be 245-ft in the interim and 475-ft high when completed.

Financial bonding for the project will not cover the cost of anything going wrong, at any point in the near or distant future.

Tailings dams continue to fail at a high rate, world-wide. The causes are typically overtopping due to heavy rain and/or snow, earthquakes, static failures and others. [1] Yet, despite the rate of failure of tailings dams at about 10 to 100 times that of water retention dams, and the devastating environmental impacts, this EIS wrongly assumes that adequate design and construction practices will be used. The safety of the tailings dam or a mine tailing impoundment structure is not improved by renaming it, for example, as a "tailings storage facility."

[1] David Chambers, Ph.D., P. Geop., Center for Science in Public Participation, Bozeman, Montana, "The Increasing Number of Tailings Facility Failures: Navigating the Decade 2020-2029," Canadian Dam Association CDA 2019 Annual Conference, Calgary, AB, Canada, October 6-10, 2019.

Seismic Design and Construction Adequacy Not Assured by the EIS Plan

In the Stibnite Gold Project (SGP) EIS, it is stated that:

> *Geotechnical stability of the SGP facilities would be ensured by practices for design, construction, and operation of the facilities. Studies have been conducted to characterize the geologic conditions of the foundation areas of these facilities and these characteristics have been incorporated into the designs of the facilities.*
>
> *The designs of major earth fills such as the TSF and TSF Buttress have incorporated slope stability analyses including the potential effects of earthquakes. Impacts from earthquakes on these and other SGP facilities would be minimized by incorporation of existing geotechnical design standards and building code standards, as well as construction quality control, operations and maintenance, and surveillance.*

The problem is that the appropriate selection of design earthquake and maximum loading is not required in Idaho. Not at the Stibnite Gold Project location.

Having a study of the seismicity of the Stibnite Gold Project is different than properly determining the design earthquake for the tailings storage facility. And even a properly designed tailings dam will fail if it is not properly constructed at each phase of construction.

Also, should the proposed liner or cap not be perfectly installed, water inflows from springs, creeks and precipitation can saturate the tailings materials, adversely affecting seismic performance.

In 2022, the Idaho Department of Water Resources (IDWR) set out to update its decades out-of-date tailings dams and water dams rules. Initially, the two separate rules were to be combined. Updates to the seismic design criteria for tailings dams were drafted and provided to the public. Then, in a turnaround, the IDWR decided to keep the rules for tailings dams separate and to make only limited changes to the tailings dams rules.

IDWR took the effort to reduce construction inspection requirements and reduced other requirements for tailings dams, despite ongoing problems worldwide with failure of tailings dams and the potential for extensive and long-lasting environmental damage.

But IDWR decided to retain the scientifically and technically inadequate existing tailings dams (referred to as mine tailings impoundment structures) regulations which exclude the Stibnite Gold Project from requiring the tailings dam at that location to meet any seismic criteria.

This was not an inadvertent oversight but appears to be a deliberate decision to avoid having seismic design regulations for the Stibnite Gold Project. When I questioned the IDWR, I received an email on August 16, 2022 stating that:

> *"*Please note that existing MTIS Rule 035.16(g) requires the design to meet Seismic Zone 3 requirements and shall apply *only* to structures located east of Range 22 E (~114th meridian or roughly, a N-S line from Salmon to Burley)."

The Stibnite Gold Project is located **west** of this line, and therefore existing IDWR regulations do not apply appropriate seismic design regulations to the Stibnite Gold Project.

The IDWR MTIS Rule 035.16(g) does not require earthquake design loads to be evaluated for sites "located east of Range 22 E., Boise Meridian." No criteria for selection the design earthquake that the tailings dam must withstand are provided in the IDWR regulations for tailings dams located west of this line. Again, the Stibnite Gold Project is west of this line and so IDWR regulations for seismic analysis do not exist.

So, the assumptions and statements in the SGP EIS are misleading and do not provide adequate basis for assuming that appropriate regulatory standards and enforcement will be applied to the Stibnite Gold Project.

It needs to be emphasized that during the 2022 rulemaking, the IDWR had already prepared more stringent seismic design requirements for tailings dams [referred to as mine tailings impoundment structures (MTIS)].

The IDWR withdrew its proposed updates for seismic criteria changes and deliberately left the existing inadequate seismic design requirements in place in their proposed and existing regulations. Furthermore, IDWR indicated that they would not attempt to update the tailings dams rules again any time soon.

Therefore, incorrect and now technically indefensible, perhaps 1970s vintage seismic hazard regulations for tailings dams by the IDWR, which assumed that the seismic hazard was negligible west of about the 114th meridian, were deliberately retained in the current and future tailings dams regulations, the Mine Tailings Impoundment Structures Rule, IDAPA 37.03.05, for Idaho.

Effectively, no seismic design criteria for tailing dams or the selection of an appropriately stringent seismic design loading at the Stibnite Gold Project exist in the current rule or the rule expected to be made law from the 2022 rule update.

Perhaps coincidentally, Perpetua was working very closely with the IDWR. Also, Perpetua had been making many donations to Idaho political campaigns in recent years as can be verified on the internet, including to Governor Brad Little.

Reasonable or scientifically based design standards, inspections of construction, selection of the properly rigorous design earthquake or any other enforcement cannot be expected in Idaho at this time. So, unless this SGP EIS enforces appropriate seismic design criteria, no one can assume that the tailings storage facility or associated buttress will be adequately designed and properly constructed. Any modifications to the implied assertions in the SGP EIS regarding changes to the tailing dam (tailing storage facility) or its buttress or the drainage under or around it or to the liner or cap must be viewed with close scrutiny.

The Stibnite Gold Project area is seismically vulnerable. Studies of the seismicity of the Stibnite Gold Project have found that the area is located within the seismically-active Centennial Tectonic Belt in northeastern Idaho and that earthquakes of about moment magnitude (**M**) 6 and

greater have occurred repeatedly. Generally high seismic ground accelerations were predicted in the 2021 study by Golder than the 2013 study by URS. The seismicity at the Stibnite Gold Project is significant and the IDWR knew this when it decided to not update seismic design requirements in its tailings dams rules in 2022.

There have been three earthquakes at or above magnitude 5.9 **M**, within about 60 miles of the SGP since 1944 and also one at magnitude 5 **M** in 1963. The recent Stanley earthquake on March 31, 2020 of Magnitude 6.5 was located 32 miles from the Stibnite Gold Project site.

The 2021 Golder study found its estimate of the maximum credible peak ground acceleration at the SGP site to be 0.32 g, while the 2013 URS study had estimated it as 0.43 g. The difference was due to differences in the ground motion attenuation modeling updates since 2013.

The 2021 Golder study made a comparison of its results to the 2013 URS study, which are shown in the table below. It should be noted that the Golder (2021) results are higher than URS (2013) except for the 10,000-yr return period.

Table 1. Comparison of probabilistic seismic hazard analysis (PSHA) results at the Stibnite Gold Project site.

Hazard Assessment	Peak Ground Acceleration (g)			
	475-yr return period	2,500-yr return period	5,000-yr return period	10,000-yr return period
URS (2013)	0.063	0.143	0.195	0.43 (or Maximum credible earthquake)
Golder (2021)	0.075	0.179	0.243	0.32
USGS, 2008		0.21		

Sources:

1. Golder 2021: Golder 2021. *Site Specific Seismic Hazard Assessment – Stibnite Gold Project, Idaho.* Prepared for Perpetua Resources.
2. URS Corporation (URS). 2013. Site Specific Seismic Hazard Analysis for the Golden Meadows Project, Idaho, Prepared for Midas Gold Inc.
3. Section 5 of URS (2013) stated the USGS, 2008, 2475-yr result.

The seismic loading for the 10,000-year return period is higher than for lower return periods, but the selection of the return period is not included or enforced by the IDWR at the Stibnite Gold Project site. So, there can be no regulatory enforcement by the IDWR regarding SBP selection of the appropriate seismic hazard or need for seismic structural performance.

The higher the ground acceleration, the more loading on a structure. But the stresses in the structure depend on elevation about the ground, the compaction of the materials, the water saturation in the tailings, and other factors. So, the study of a tailings dam depends not only on the seismicity at the site, it on the composition and compaction of materials during construction of the tailings dam and it depends on water saturation in the tailings.

Also, the duration of the earthquake as well as the "period of vibration" or the speed of the oscillation, for example, 0.1 second, which can depend on the structure being evaluated. For certain structures or equipment, more frequent earthquakes than the 10,000-year return period can produce problematic seismic events. In some circumstances, the worst loading may occur with the more frequent earthquakes even though their peak ground acceleration is less than the 10,000-year earthquake. (This may or may not apply to the SGP TSF.)

The IDWR's removal or reduction of construction inspection requirements for the seismically vulnerable structures is especially troubling at the Stibnite Gold Project. Improper drainage or improper compaction or improper liner installation may compromise the seismic capability of the structure.

The SGP EIS implies that the tailings dam, called the tailings storage facility or TSF will be designed to withstand the maximum credible earthquake. But given the way that the Idaho Department of Water Resources knowingly refused to update its regulations in 2022 regarding seismic requirements for tailings dams in Idaho, that assumption is without support.

The IDWR knowingly elected to leave antiquated language in place for seismic design criteria for tailings dams (which it calls "mine tailings impoundment structures") and that actually means that no seismic design criteria are required in IDWR regulations for the Stibnite Gold Project due to its somewhat westerly location and lack of knowledge when the regulations were written decades ago.

Therefore, this draft supplemental EIS is misleading regarding the actual seismic design criteria that the project will be required to meet. Also, the SGP admits that it may change its plans at any time, for any reason.

The bonding in the SGP EIS and also IDWR bonding is completely inadequate for default conditions or adverse or accident conditions.

This SGP EIS should assess the likelihood of Perpetua abandoning the project and leaving the site in far more precarious condition due to the high amount of tailings waste the proposed project will newly generate.

Some Additional Seismic Vulnerability Nuances

This SGP EIS misquotes and misconstrues IDAPA 37.03.05 in multiple and important ways.

On page 4-18, this EIS states that "the minimum earthquake load Factor of Safety 1.00 per IDAPA Section 37.03.0. [sic]" IDAPA 37.03.05 does state that the "Safety factors for the embankment shall be at least one and five-tenths (1.5) for static loads and a minimum of one (1) for the static plus the appropriate earthquake load."

The roundoff in the IDAPA 37.03.05 is misquoted in various ways and text in the EIS, but that is not the biggest issue.

The biggest issue is what IDAPA 37.03.05 means by "the appropriate earthquake load."

In fact, the Idaho Department of Water Resources in 2022 refused to update antiquated and obsolete seismic design criteria, with full knowledge that this project, the Stibnite Gold Project, would not have to meet any seismic design criteria.

The current and the newly proposed IDAPA 37.03.05 retains the language that excludes any project located outside of Zone 3, defined many years ago.

So, when this EIS tries to imply that IDAPA 37.03.05 requires this SGP tailings dam to meet the 475-year return period, or the Maximum Credible Earthquake (typically assumed as the 10,000-yr return period), it simply is not true. The IDWR's regulations are very outdated and IDWR has no stated seismic design analysis requirement for the Stibnite Gold Project location. (See IDWR statements made in its 2022 rulemaking.)

Again, the fact of the matter is that IDWR has regulatory enforcement over tailings dams, which it calls "mine tailings impoundment structures" and its own regulations exclude seismic considerations from the SGP. Furthermore, the IDWR chose not to update the outdated and obsolete seismic criteria for tailings dams in the 2022 rulemaking.

This EIS does reveal that the area where the SGP is to be located is vulnerable to large earthquakes. This EIS does reveal that the seismic capability of what it calls the "Tailings Storage Facility" which is a tailings dam, is vitally important. But what this EIS falsely states and/or implies is that the seismic design capability of its tailings dam will be required to meet stringent seismic criteria.

The IDWR's regulations exclude this entire region from requiring seismic design analysis or meeting seismic design criteria. Furthermore, if the IDWR chose to go beyond its regulatory requirements, the IDWR's own regulations do not stipulate how the "appropriate earthquake load" would be determined. Would it be based on loads from the 475-yr return period? Would it be from the Maximum Credible Earthquake? There is no regulatory explanation for selecting the return period or the method of deciding the maximum design loading, especially given to ambiguous seismic design requirements for tailings dams in Idaho.

SGP EIS FEMA Statements

Many of the statements in the SGP EIS that give the impression of sound regulatory frameworks for the seismic safety of the project. In fact, the Idaho Department of Water Resources (IDWR) plans no enforcement of any seismic design criteria or even the requirement of any seismic analysis for the SGP due to its location in the western half of the state.

While there are helpful and well-intentioned FEMA reports cited, these reports are not regulatory requirements at the Stibnite Gold Project. There is no reason to assume that FEMA guidelines will be enforced or that many of the statements made in the SGP EIS will be enforced.

The SGP EIS states:

"Federal Emergency Management Agency (FEMA) National Dam Safety Program (NDSP) - The FEMA has developed the NDSP, which includes standards that are applicable to structures constructed on federal land, including tailings storage facility embankments (i.e., dams). The

NDSP provides a conceptual framework that includes requirements for site investigation and design, construction oversight, operations and maintenance, and emergency planning."

"The NDSP is a partnership of states, federal agencies (including Forest Service), and other stakeholders to encourage and promote the establishment and maintenance of effective federal and state dam safety programs to reduce the risk to human life, property, and the environment from dam-related hazards. The NDSP includes federal recommendations for dams related to risk management, emergency action planning, flood risks, design inflows, seismic analysis and design, and general dam safety. The state, IDWR specifically, is responsible for reviewing and approving the design and specifications for TSFs."

Furthermore, in the SGP EIS, in the Seismic section, it states:

> "A seismic hazard analysis describes the natural phenomena such as ground rupture, fault movement, or soil liquefaction that could be caused by an earthquake. The purpose of the analysis is to determine the magnitude of ground accelerations due to various earthquake events to be used in the stability analysis. The results of seismic hazard analysis are used as a basis for design and mitigation measure decisions (FEMA 2006). An initial site-specific seismic hazard analysis (SHA) was conducted by URS (2013). In conversations with the IDWR, Perpetua was advised to update the SHA for the SGP. The update was prepared by Golder Associates Inc. in May 2021 (Golder 2021).
>
> The updated SHA incorporated technical developments in SHA methodology since 2013 and utilized updated seismic source (earthquake) records from the USGS national seismic hazard map in 2014, 2018, and data from the March 2020 earthquake near Stanley, Idaho. Golder revised the list of faults considered in the SHA by URS (2013) to delete one small fault and add four large faults. The nine major crustal faults within 62 miles of the SGP that were considered in the Golder analysis included: Deadwood-Reeves Creek, Long Valley, Sawtooth, Council, Shirt Creek, Rush Peak, Lost River-Challis Section, Lost River-Challis /Warm Springs/Thousand Springs Sections, and Squaw Creek. Of these, the Deadwood-Reeves Creek fault was the closest to the SGP site at a geometric distance of about 5.3 miles.
>
> In addition to the updated seismic source information Golder incorporated the updated earthquake acceleration attenuation ground motion models (GMMs) applicable to this part of western North America.
>
> The seismic hazard is assessed from instrument measurements as well as historical accounts and geologic observations. SHA is quantified by three parameters: level of severity, spatial measurement, and temporal measurement (Wang 2009). The seismic hazard was assessed for the SGP site including the proposed TSF location, but the results are also usable for the other proposed facilities at the SGP. Golder performed both probabilistic and deterministic seismic hazards analyses. The combined results, probabilistic SHA (PSHA) and deterministic SHA (DSHA), are an effective means for determining maximum design earthquake ground motions. Maximum design earthquake

is an earthquake that would produce the maximum level of ground motion (shaking) for which a structure (e.g., TSF dam) is to be designed or evaluated (FEMA 2005).

PSHA is used to determine the likelihood (probability of occurrence) that a given level of ground shaking could be exceeded during a specified timeframe at a site from a combination of earthquake sources. The likelihood of exceedance is determined by the probability of occurrence of any earthquake with a range of magnitudes, typically within about 62 to 125 miles of the selected site. The analysis includes consideration of the attenuation of ground motion from the earthquake sources to the site. Empirical GMMs are used to model the ground motion attenuation rate for any given earthquake magnitude, source-to-site distance, and site ground conditions.

Peak ground acceleration (PGA) is traditionally used to quantify ground motion (shaking) at a site and is generally a function of the magnitude of the event and distance from the source, but other factors may be considered, such as rock type or type of faulting. The PGA is typically expressed in terms of a fraction of gravity (g), with probability of exceeding a certain level over a specific period of time.

The PSHA results for the URS analysis indicated the PGA for 475-year and 2,500-year return period earthquake events are 0.06g and 0.14g, respectively. The Golder analysis indicated comparable PGA estimates of 0.075g and 0.18g for the same return periods, respectively. For context, a PGA of 0.1g in bedrock is considered the approximate threshold at which damage occurs in buildings that are not specially constructed to withstand earthquakes (FEMA 2006).

DSHA is based on known regional seismic sources and, unlike the PSHA, does not consider the probability associated with a particular earthquake hazard. In a DSHA, the ground motions at the site are estimated for the maximum credible earthquake that could impact the site. For the URS (2013) analysis the maximum credible earthquake modeled was a magnitude 6.9 earthquake on the Deadwood-Reeves Creek fault (URS 2013). This event was estimated to result in median calculated PGA of 0.43g at the SGP site. The Golder analysis was based on a maximum credible earthquake of magnitude M7 on the Deadwood-Reeves Creek fault which resulted in an updated PGA of 0.32g at the SGP site (Golder 2021). Golder explained the main reason for the differences in estimated PGAs at the site was that URS used the NGA-West1 Project GMMs available at the time (2013) and Golder used the updated NGA-West2 Project GMMs (Golder 2021).

Final design of the SGP TSF and other facilities would incorporate the site-specific ground accelerations calculated from the latest seismic hazard analysis.

The Golder (2021) SHA results are similar to those of the USGS National Seismic Hazards Maps (NSHMs) which are the basis for the U.S. building code provisions and the International Building Code. The Golder results are less than, or about the same, as the 2014 USGS NSHM but larger than comparable hazard values in the USGS 2018 NSHM."

The problem is that the State of Idaho's Idaho Department of Water Resources regulations for "mine tailings impoundment structures" regarding seismic analysis do not apply to the Stibnite Gold Project location. This is because of out-of-date and technically indefensible exemption of the Stibnite Gold Project location from needing a seismic analysis. The 2022 rulemaking by IDWR decided to not update the inadequate seismic design requirements for tailings dams and this greatly impacts the western portion of the state. The IDWR did decide to reduce tailings dam construction inspections and also to reduce tailings dam bonding requirements.

The IDWR regulations, even without omitting the western portion of the state and the Stibnite Gold Project from seismic design analyses, also leaves enormous wiggle room regarding existing tailings dams as the agency can deem the failure of the tailings dam only a low or significant hazard problem, rather than the high hazard structure capable of very high environmental devastation. The agency can also choose to not enforce its regulations, even if adequate regulations were promulgated. In reality, no one can or should count on appropriate or technically justified oversight and enforcement by the IDWR with regard to tailings dams.

SGP Would Become a Huge Electrical Power User

"In order to serve Perpetua's 60-megawatt (MW) load requirement for the SGP, Idaho Power Company (IPCo) would rebuild or construct 72.8-miles of transmission line and associate facilities…" This alone will forever degrade the entire forest region as Idaho Power will surely seek more customers beyond the 20-year expected life of this SGP project. It will also strain power supplies further, in a state that continues to experience high population growth and strained electrical resources. It also strains fire fighting capability that will be needed to protect the power lines and the no-doubt increased development this will invite.

The 60 megawatts of electricity to be used by this project drains electrical resources and may likely contribute to higher energy costs for citizens in Idaho. To what extent will Idaho rate payers be subsidizing the power lines and power supplies to the project? The added potential for power blackouts and added costs to rate payers was not included in the SGP EIS and it should be.

Legacy and New Toxic Materials

The ore that is mined and was mined at the Stibnite Gold Project contains antimony, arsenic, and mercury. The milling of ore releases these materials. The amount of uranium and thorium in the ore was not described nor was it monitored and the sampling for lead, the stable (and also non-stable) decay progeny of radioactive uranium and thorium, has only spottily and inadequately monitored.

The soup of antimony, arsenic, mercury, lead, and other toxic materials such as cyanide is toxic to humans and to fish. The Forest Service approach is now to state that public drinking water criteria would likely be exceeded **already** and so they seem to deem that no protection to reduce further poisoning is needed.

Human health is deemed protected only because it is assumed that no one will drink of the poison surface or ground water and no one will live there permanently. This perverse logic has

been used, all while promoting the idea that certain aspects of the mining site may be improved by the project, as many other aspects will greatly increase the load of toxic waste and the risk of further tailings waste migration and sediment/tailings releases.

The toxicity of the antimony, arsenic, mercury and lead would rightfully require specific analysis of harmful effects to the unborn children carried in the womb of pregnant women. But, alas, no such consideration is actually given in setting the toxicity standards in air, soil, food or water.

Conclusion

This draft supplemental EIS states that this Stibnite Gold Project proposed by Perpetua Resources will result in many square miles of forest and wetlands disappearing and that water temperatures in creeks will be elevated for at least 100 years if this project is accepted.

The SGP EIS does not address the risk of tailings dam collapse or any other problem occurring during or after the few decades of mining due to inadequate rulemaking for tailings dams by the IDWR and its lax enforcement.

This SGP EIS virtually assures added environmental catastrophe in Idaho due to mining.

The SGP EIS states that there is "some uncertainty regarding the specific source of material to meet the identified GM [growth media] deficits." So, the successful replanting of vegetation is iffy, at best.

The liner and cover are depicted as though reliable and proven without providing evidence, analysis or independent evaluation of efficacy.

The SGP EIS, throughout, relies on wishful thinking rather than evidence, especially in regard to liner success.

The draft supplemental EIS downplays the harm of this project to groundwater and to the region with unjustified assumptions including the assumption that nothing will go wrong. And this SGP EIS does so, as it puts forth statements implying adequate seismic design criteria will be applied and enforced. The FEMA documents cited are not regulatory documents for tailings dams in Idaho. To omit the actual regulatory documents and the history of inadequate oversight and enforcement by IDWR and the deliberate failure of IDWR to address adequate seismic design requirements for tailings dams in the 2022 rulemaking by the IDWR is a gross error in this Stibnite Gold Project EIS. The IDWR has no requirement for seismic analysis of the Stibnite Gold Project tailings dam structures.

The Forest Service may mean well. Perhaps they are just naïve. Or just doing what it takes to stay employed. But the Stibnite Gold Project EIS is a plan for disaster. Blanket approvals for this Stibnite Gold Project to proceed must not be granted. **At the very least, given the history, approval should be limited to step-wise incremental performance-based achievement and not a green-light to proceed full speed ahead toward more permanent destruction of Idaho's environment.**