Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed at the headwaters of the South Fork Salmon River watershed. As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples of the area.

The SGP will have adverse effects on Chinook salmon and bull trout. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk and flies in the face of this investment and effort to restore these species to a sustainable population. Both action alternatives involve the removal and disturbance of mineralized materials which have the potential to release heavy metals and ions that would deteriorate surface water resources and groundwater chemistry. Project operations will increase water temperatures in West End Creek and the EFSF. Post-closure activities will result in elevated temperatures in Meadow Creek and West End Creek. The temperatures in most of the waterways are not expected to return to baseline levels (or current water temperatures) for approximately 100 years. By that time irreversible damage to the ecosystem and native species will have already taken place.

As proposed, this project will result in the loss of over 120 acres of high-functioning wetlands. It will negatively impact the general water quality of streams found within the site from additional sedimentation and the potential release of additional contaminants mobilized by mining and construction.

Although Perpetua prefers to present the SGP as a ‘restoration’ project, it is a massive industrial mine that will leave the landscape unrecognizable and degraded for lifetimes to come through the creation of three open pits, the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat, and an expanded footprint that more than doubles the previous disturbance of the Stibnite mining district.

Sedimentation from mining activities and construction will be a detriment to water quality. Groundwater will suffer from an increase in analyte concentrations from the leaching of development rock. However, the argument for allowing this degradation in water quality is that “existing groundwater in those areas typically does not meet regulatory criteria for use as drinking water due primarily to arsenic and antimony concentrations,” (p. ES-15). Existing degraded water quality should not be used as a rationale for activities that further pollute groundwater in the area.

The effects of climate change will exacerbate the impacts the SGP will have on the environment and were inadequately incorporated into the SDEIS. While briefly acknowledged, the compounding impacts of a warming climate were not taken into consideration when predicting stream temperatures or other environmental impacts that are intrinsically linked to the climate.

Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County, but there are no risk analyses on local communities if a hazardous spill were to occur and the potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service.

As proposed, the SGP raises numerous concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). Through the SGP, Idaho’s designated Wild and Scenic rivers may be adversely affected by construction, operations, and closure activities. However, the SDEIS fails to recognize any of these rivers in its analysis. The Middle Fork of the Salmon River and the Main Salmon River are both protected under the WSRA and could face the far-reaching impacts of this mine. Light, visual, water, and dust pollution are direct effects that could harm ORVs on the Middle Fork of the Salmon. The Main Salmon is at risk of any pollution that contaminates the South Fork of the Salmon (SFSR) and the East Fork South Fork of the Salmon (EFSFSR) as their water flows into the Main Salmon. Both the SFSR and the EFSFSR lie near the access routes and the area of operations. Also, some rivers are eligible and suitable to be designated under the WSRA that lie within the analysis area of this project. Under the WSRA and Payette National Forest Plan, eligible and suitable rivers must be preserved in their free-flowing state as well as have their water quality and ORV(s) protected as if there were a designated Wild and Scenic river. Within the analysis area, three rivers are deemed either eligible or suitable: Burntlog Creek (eligible), Johnson Creek (eligible), and the South Fork of the Salmon River (SFSR) (suitable). The SDEIS admits at 3.23.4.2 that “detailed baseline data for existing water quality where the SGP components intersect the SFSR at Warm Lake Road have not been compiled.” But, the SDEIS makes a premature conclusion that the water quality in the South Fork of the Salmon River would “likely be too small to measure” (p. 4-638). The same comments are also made about Burntlog Creek (p.3-488 ). To provide an accurate assessment of water quality, baseline conditions need to be obtained.

Recreation, in any form, within the general area of the mine will be negatively impacted. The analysis of impacts on recreation is arbitrarily limited to a 5-mile radius from major mine features and does not include any discussion of traffic displaced to the South Salmon Road and Lick Creek Road that will logically result from this project.

Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho. The SDEIS clearly states that “Adverse impacts to tribal rights and interests under either alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe’s salmon restoration efforts”.

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

Sincerely,

Sydney Anderson