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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.

First and foremost, 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 far too long and far too often these reserved rights have been treated as optional by the government and federal agencies. This project, if approved, will serve as yet another instance where tribal sovereignty was ignored, all for the sake of a profit-driven gold mine held by a Canadian parent company. This additionally flies in the face of the recent policy implementation at the Department of Agriculture and Interior to strengthen Tribal consultation on agency projects and decisions.¹

There aren’t many places left in this world that serve such a broad swath of the public as the Salmon River mountains and the South Salmon River drainage. No matter what form of recreation you may pursue, this area represents some of the best of what Idaho has to offer. Whether you’re one of the many who travel from all over the country, and the world, to paddle the South Fork Salmon River during spring run-off, enjoy mountain biking or hiking to remote fire lookouts, spend your time in the winter snowmobiling or backcountry skiing, or simply enjoy the incredible views this area provides, your experience will undoubtedly be for the worse if this project moves forward.

The Forst Service is incorrect in its assessment of recreational impacts to limit the analysis to an arbitrary boundary of 5-miles surrounding any major mine plan infrastructure. This boundary completely disregards any impacts to the South Salmon Road, Lick Creek Road, and any/all recreation accessed along these routes. Under either alternative, any reasonable person will likely attempt to avoid the incredible increase in traffic and delays that will be expected along the

¹ <https://www.doi.gov/pressreleases/departments-interior-agriculture-advance-mining-reforms-aimed-protecting-and>

<https://www.doi.gov/pressreleases/interior-department-strengthens-tribal-consultation-policies-and-procedures>

Johnson Creek Road, either during construction or for the life of the project. This will ultimately mean additional traffic will be displaced to the S. Salmon Road or Lick Creek Road, two roads that can already be quite dangerous without the funneling of increased traffic.

Beyond the limited geographical scope of impact that was used in this analysis, the Forest Service grossly misrepresented the volume of river-based recreation that this area draws. In particular, the East Fork of the South Fork Salmon River from the confluence of Johnson Creek to the confluence with the Secesh River provides some of the best roadside kayaking or rafting that can be found in the state. Additionally, as mentioned above, the South Salmon from the confluence with the Secesh to the confluence with the Main Salmon provides one of the best multi-day paddling trips in the United States, let alone Idaho. Any negative impacts on water quality, traffic, or general access will negatively impact this user group that was not analyzed at all within the SDEIS.

For access, the Forest Service has identified the Burntlog Route as the preferred access route in and out of the mine. While I strongly urge the “No Action” alternative be endorsed, if this plan moves forward, the Johnson Creek Road is the only feasible access route. Beyond all the problems of the road Burntlog Route itself with habitat fragmentation, Inventoried Roadless Area encroachment, and proximity to the Frank Church Wilderness, it is illogical to assume that once complete that it will serve as a functional access road to Stibnite.

Given the terrain and amount of snow that falls on the area, it is inevitable that this road will be closed, for at least some period of time, due to avalanche activity. Even with diligent mitigation measures. Many other roads in Idaho experience the same challenges and are closed for days at a time. While that may be an inconvenience for travelers, the implications of the Burntlog Route being blocked are far more complex. If for instance, at mine-year 5, the Burntlog Route becomes impassable and there is an emergency or some supplies must be delivered to Stibnite, Perpetua will have to find another way into the site. Johnson Creek will not be an option considering that it will have been re-opened as an oversnow travel route. After compaction from grooming activities and snowmobile travel this road will be impossible to plow and reopen in short order. This will then lead Perpetua to request travel along the South Salmon Road, which is even less suitable for heavy traffic, let alone the restrictions for transporting fuel and other hazardous materials that exist. For this reason alone, the Johnson Creek road must be the alternative selected *if* this project is approved.

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 is contradictory to this investment and effort to restore these species to a sustainable population. Stream temperatures are predicted to be elevated for up to **100 years** within the mine site

boundary and the habitat for these sensitive species will be for the worse, not better, as a result of this project.

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.

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. Additionally, the lack of analysis that was done on the potential impacts that this project may have on our already stressed hospitals and first responders is troubling. The word "hospital" only occurs twice in the entire 1,600-page SDEIS...one of which is to describe the old hospital that was built at Stibnite during WWII. Given the proximity, additional analysis must be presented to the communities of Valley County that will bear the burden associated with this massive industrial operation.

As proposed, the SGP raises numerous concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). The project itself is located at the headwaters of the suitable South Salmon River, which feeds directly into the designated Main Salmon River. However, the scope of analysis does not include any potential impacts that extend downstream of the site boundary to review these sections of river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if this project moves forward.

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

Sincerely,
Nick Kunath