

Dear Forest Supervisor Jackson,

I was a full time resident of Idaho for over 30 years, from 1985-2016, including 7 years residing in McCall. I backpacked, camped and toured the South Fork of the Salmon watershed extensively, and memorably encountered wild salmon in the area. Then in 2016, I moved to Port Townsend, WA on the Salish Sea, where I experienced first-hand the majesty of the critically endangered species of Southern Resident Killer Whales, who rely in large part on Columbia-Snake salmon. All this is to say that I care deeply about our Pacific Northwest ecosystem, understand how interconnected it is, and how crucial salmon and steelhead are to that entire ecosystem.

Accordingly, I appreciate the 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 listed salmon, steelhead, bull trout, as well as other wildlife such as frogs aquatic insects and birds, will negatively impact all forms of recreation within the area, and will impair treaty reserved rights and other protected interests of the native peoples of the area.

The SGP will adversely affect 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. 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.

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 greenwash the SGP as a 'restoration' project, in reality, it is a massive industrial mine that will leave the landscape 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 narrow roads and 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). 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.

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 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. In the face of climate change and the compelling need to protect natural areas, especially the last best refugia for salmon and steelhead that is Central Idaho, we must halt further industrial degradation of our wild places.