January 10, 2023

Linda Jackson, Forest Supervisor

Payette National Forest

500 N. Mission St.

McCall, ID 83638

To Ms. Jackson or whom it may concern:

Please consider the following SDEIS comments.

Please select the no-action alternative for the Stibnite Gold Project, or better yet, develop a new alternative to restore the site with no additional mining. Please honor and preserve the Nez Perce Tribe’s 1855 treaty rights to fish (and the continued existence of Chinook salmon, steelhead, and bull trout), hunt, gather, and travel in all usual and accustomed places, specifically in the proposed Stibnite Gold Project area.

Drastic measures to offset climate change (such as solar power and greenhouse gas emission reduction) should be included. Climate data should be included in all models and predictions (such as water temperature).

The ESA Recovery Plan for Chinook salmon lists water quality/temperature, riparian conditions, passage barriers, excess sediment, stream complexity, and flood plain connectivity as tributary habitat limiting factors for Chinook salmon in the East Fork South Fork Salmon River (NMFS, 2017). Any Stibnite Gold Project activity that exacerbates these issues will be detrimental to Chinook salmon (and other ESA-listed fishes) and should be eliminated or minimized to the greatest extent possible. Predicted stream temperature increases are especially concerning and climate change should be included in stream temperature modeling. If the Forest Service cannot include climate change in modeling because analysis is constrained to direct effects of the proposed project (although the project itself will contribute to climate change so perhaps it is a direct effect), then climate change should be factored into monitoring. Otherwise, what basis will the Forest Service use for attributing stream temperature increases to mining activities (unless all stream temperature increases are attributed to mining activities and Perpetua Resources is held accountable for reversing any rise over permitted temperature increase)?

Reliance on model prediction (especially long term) should be limited, and models should be validated over time. Perpetua Resources should have a plan for other cooling options before allowing water back into the stream if riparian plant establishment is unsuccessful and shade cannot keep stream temperatures below lethal levels Chinook salmon, bull trout, and other fish.

With excess sediment also identified as a limiting factor for Chinook salmon recovery, predicted sediment effects should be better evaluated.

What data prove the fish tunnel will work? Are there options provide passage besides transporting fish around the barrier if the tunnel is unsuccessful? Restoring fish passage in the East Fork South Fork Salmon River above the Yellow Pine Pit without mining is the best option.

Please use the most stringent and current applicable water quality standards.

How are baseline conditions defined or how does the Forest Service determine which conditions to call baseline? All current contamination and discharge should be included in baseline conditions.   
Also, any remediation slated to occur prior to mining as a result of the Clean Water Act lawsuit or EPA direction should be considered and discussed, even if it’s technically impossible to include as baseline.

I’m concerned about the durability of the proposed geosynthetic liners for the Yellow Pine and Hanger Flats pits and the Tailings Storage Facility (the SDEIS model predicts leakage) and contamination of surface or groundwater. How can Perpetua Resources guarantee appropriate liner function, and what will be done if or when the liners fail?

Please analyze for effects to freshwater mussels.

Please add protections to existing wetlands (at least to those of high value, for which loss of cannot be truly mitigated) and associated hydrology, especially pertaining to road and transmission line construction.

Thank you for your diligent review of SDEIS comments.

Johanna Stangland

McCall, Idaho

Reference:

NMFS. (2017). *ESA Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead.* Portland, OR: National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Northwest Region.