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First name: Brooke
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Organization: The Grand Salmon Team
Title: Expedition Leader
Comments: To whom it may concern at the Forest Service,

I am writing this comment in opposition to the Stibnite Gold Project.

I am a member of The Grand Salmon Source To Sea Conservation Campaign. This past spring, our team of women kayaked the Salmon River from the source to the sea as a conservation project for salmon restoration.

As I am sure you know, Snake River Basin sockeye salmon, chinook salmon and steelhead are all listed as either endangered or threatened on the endangered species list. Those anadromous species all rely on the healthy habitat in the cold mountain streams of Idaho to spawn. I am sure you also know that in 2021, there were FOUR wild adult sockeye salmon that made it back to Stanley Basin to spawn. FOUR.

The recovery goal for wild adult sockeye salmon is 9,000 spawning sockeye every year. In order to get there, we need to ensure that the entire watershed - from the headwaters to the ocean - remains healthy.

Our team of scientists and kayakers spent 79 days kayaking from the headwaters of the Main and Middle forks of the Salmon, all the way to the Pacific Ocean. One of the main takeaways from our source-to-sea expedition of the Salmon River was how connected everything in the watershed is. When we reached the Pacific Ocean, we were over 1,000 miles away from where we started at the headwaters of the Salmon River. It had taken us 79 days and thousands of hours of paddling to get there. And yet - it was the exact same water that we had started on. It was the same watershed. Anything that happens at the top of the watershed can and will impact everything downstream. What this means in the Salmon River drainage is that everything that happens at the headwaters of the East Fork South Fork Salmon will impact the South Fork of the Salmon, the Main Salmon, the Snake, the Columbia, and even the Pacific Ocean. The entire watershed is connected.

Our team originally planned on paddling the East Fork of the South Fork and the South Fork Salmon as well as the Middle and Main Forks (we wanted to get every headwaters and every spawning grounds), but high water levels caused us to make a conservative decision and back out of the East Fork South Fork and the South Fork Salmon.  Instead of paddling the South Fork Salmon, we toured the Stibnite Gold Project site with Perpetua Resources as our tour guides.

I have now seen firsthand the massive tailings pile that exists at the headwaters of the East Fork of the South Fork Salmon. There was a creek of mine sludge flowing straight from the tailings pile into the East Fork South Fork. The geologist giving us the tour said it had arsenic, cyanide, and antimony in it - three extremely toxic chemicals that are flowing straight into the Salmon River watershed.

I am aware that as part of their mining plan, Perpetua Resources says they will "restore" the historic mining site. But they also say they are going to significantly expand the mining site. I don't see how restoration and expansion can go hand-in-hand. Reading through the DEIS and the Supplemental DEIS - this plan simply isn't realistic.

A 2017 study published by Earthworks (attached) looked at 27 different gold mining operations in the U.S. Their results showed that 27 of the 27 mines - 100% of them - experienced at least one pipeline spill or accidental release of cyanide, mine tailings, ore concentrate, or diesel fuel. ONE HUNDRED PERCENT OF THEM EXPERIENCED SPILLS. And of those 27 mines, water quality impacts were found at 20 of them. This means that only 7 gold mines did not experience water quality impacts, but when they examined those 7 mines, they found that 6 of them had no running water nearby. The only reason they didn't experience water quality impacts

was because there was no water that was available to be impacted.

The Stibnite Mine site is an extremely seismically-active zone (that's how the minerals got there in the first place!) with multiple fault lines and a high chance of earthquakes. It is also a zone that is very avalanche-prone. When we visited Stibnite last spring, the river was dammed full of trees and debris from avalanches. The likelihood of a natural disaster in this zone is high, and mitigating them is not always possible. It is extremely likely that if Perpetua Resources reopens and expands this mine, a natural disaster will cause a leak in the tailings pile. And if a leak happens, toxic material will flow into the East Fork South Fork Salmon, the South Fork Salmon, the Main Salmon, the Snake, and the Columbia Rivers. All of them will be impacted.

There is no chance of recovering the endangered and threatened species of salmon and steelhead if there is a mine polluting their spawning grounds and everything downstream.

I urge you to put a moratorium on this project forever.  You don't put a major mining project at the headwaters of a massive watershed. This seems like such a simple concept, and yet I am still here writing this comment, hoping that you will look at the science backing this issue (rather than the money), and make a decision for the environment. Please, say no to the Stibnite Gold Project, and say yes to the salmon.

Thank you for your time,
Sincerely,
Brooke Hess