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First name: William
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Organization:
Title:
Comments: Dear Forest Supervisor Jackson,
As a river user of the South Fork Salmon River, I am grateful to comment on the Supplemental Environmental Impact Statement for the Stibnite Gold Project. This project poses tremendous risk to the sovereignty of Nez Perce Tribe and their federal treaty protected rights, to endangered Chinook Salmon and Bull Trout habitat, and economically and socially beneficial recreation in the East Fork South Fork Drainage. I am calling on you to reject Perpetua Resources Stibnite Gold Project.

In my experience, driving up the road along the East Fork South Fork Salmon up to the existing Stibnite mine you can sense the delicate ecology of the headwaters of this powerful drainage. The road hugs the creek and my truck kicks up plums of dust over the surrounding area. Weaving through ponderosa pine trees, the mighty river I paddled just a day prior into the Main Salmon has now become a small creek bed intact in with vital stream-bed habitat for Chinook Salmon, it's easy to see how historic runs of Chinook made the thousand mile journey from the mouth of the Columbia River to seek refuge here. All this is lost upon rounding the last bend to open pit mine first opened in 1899. The mid summer heat is suddenly on full display, the hill sides have been ripped up and made bare, and orange massive cancer just to a few miles outside of the largest protected wilderness in the lower forty-eight.

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. 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 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.
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 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.