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Comments: Thank you for the opportunity to comment on this SDEIS.

The Forest Service's broad principles and standards for projects on public land should consider impacts on resources in light of economic, environmental, and social impacts. This framework helps ensure a comprehensive analysis to support decision-making across a wide range of projects that either directly or indirectly affect water quality or water quantity, including ecosystem restoration or land management activities. Unfortunately, the SDEIS is deficient as it only partially considers economic, environmental, and social impacts, only addresses economic benefits through the lens of short-term (during construction/operations), and does not address environmental or social benefits fairly.

Functioning ecosystems provide a range of services that are essential to support economic activity and improve environmental conditions. Ecosystems also support human wants and needs that contribute toward social welfare. Some are essential for human survival (such as food), while others support services that contribute toward human enjoyment (such as recreation). Economic benefits can also result from the passive use value that people derive from the protection, enhancement, and preservation of natural resources for the use and enjoyment of others, including future generations. None of these benefits have been characterized in the SDEIS or considered in Perpetua's feasibility report. Furthermore, the feasibility report makes clear that the SGP is only economically feasible because of the potential profits to be derived from gold sales-but the portion of adverse impacts that would result from the volume of gold mined vs. other products is skewed at best and in my opinion misleading. This is a red flag and needs to be acknowledged if not fully reconsidered.

Vital resources are at risk due to the proposed action. Critical habitat for ESA-listed chinook salmon, steelhead, and bull trout all exist within the footprint of the SGP. I am extremely concerned about the proposed action and the implications for the health of the fisheries in the area and downstream. For starters, the fish tunnel that has been proposed to provide passage to the ESFS during mining operations should be an absolute no-go. Not nearly enough data is available to vet this experimental approach as a technically viable solution for the anadromous and resident salmonid populations in the area. To reference the USFWS' own previously-provided comment on this issue, "there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively." It is erroneous to simply assume that this unique tunnel concept would function as has been dreamed up by Perpetua Resources. This singular issue should be enough to negate the proposed action as characterized.

Furthermore, the SDEIS acknowledges that the proposed action would result in an additional barrier to fish passage in Meadow Creek and that stream temperatures are predicted to be elevated above existing baseline conditions for up to 100 years when vegetation can be reestablished to the degree that it can provide adequate shade. And this doesn't even account for climate change effects, which were not considered in detail. No climate change considerations were incorporated into any detailed analyses for stream temperatures or other potential impacts from the proposed action. This is a fatal flaw of the SDEIS, and might as well be a death sentence for chinook salmon and possibly other species such as bull trout and west slope cutthroat. This is an unacceptable outcome. The fish don't have a voice, and they don't get to comment on the SDEIS.

While I can understand that this is not the intent of the SGP, the action alternatives pose a substantial risk of releasing heavy metals, sediment, and other elements and pollutants that could permanently deteriorate surface and groundwater resources. Due to the required drawdown of the water table at the project site, indirect impacts to wetlands and groundwater recharge of streams may be greater than anticipated or what has been documented in the SDEIS. Furthermore, the "reclaimed" wetlands on top of the proposed liner system should not be

considered as such because they are unable to connect to the water table and function as nature intended. This is another area where the SDEIS is insufficient, and additional study and details should be provided before a decision is made.

The area of analysis for this project extends five miles from any major SGP feature. This analysis area is too narrow in scope and misses numerous trailheads, access points, and campgrounds that will be impacted by either action alternative presented in the SDEIS.

The SDEIS also fails to incorporate any sort of downstream analysis. This would be different than cumulative effects, but the analysis should be expanded. The South Fork Salmon River, while being a premier recreational destination in itself, feeds directly into the Wild and Scenic Main Salmon River. Any negative impacts on water quality as a result of the proposed action stand to influence the huge number of private boaters who float this stretch of river annually as well as the dozens of licensed outfitters who operate commercial float and fishing trips along this stretch of protected water.

The SDEIS indicates that "No significant impacts were identified for special designations," (p. 4-623). This statement is not accurate. Through the SGP, Idaho's designated Wild and Scenic rivers may be adversely affected by construction, operations, and closure activities. However, the SDEIS fails to recognize any of these rivers in its analysis. The Middle Fork of the Salmon River and the Main Salmon River are both protected under the Wild and Scenic Rivers Act (WSRA) of 1968 and could face the far-reaching impacts of this mine. Light, visual, water, and dust pollution are direct effects that could harm Outstanding Remarkable Values (ORVs) on the Middle Fork of the Salmon. The Main Salmon is at risk of any pollution that contaminates the South Fork of the Salmon (SFSR) and the East Fork South Fork of the Salmon (EFSFSR) as their water flows into the Main Salmon. Both the SFSR and the EFSFSR lie near the access routes and the area of operations.

The SDEIS admits at 3.23.4.2 that "detailed baseline data for existing water quality where the SGP components intersect the SFSR at Warm Lake Road have not been compiled." But, the SDEIS makes a premature conclusion that the water quality in the South Fork of the Salmon River would "likely be too small to measure" (p. 4-638). The same comments are also made about Burntlog Creek (p.3-488 ). To provide an accurate assessment of water quality, baseline conditions need to be obtained.

The SDEIS asserts that "No significant issues were identified for wildlife and wildlife habitat," (Wildlife Specialist Report, p. 25). However, the analysis admits that construction and mine operations will disturb and harm wildlife in this area, including ESA-listed species. This is a ridiculous assertion and highlights one of the flaws of the NEPA process-that the threshold for "significant" can be manipulated to suit the needs of a pre-determined conclusion.

Lastly, the SGP is located within the traditional homelands of the Nez Perce, Shoshone-Bannock, and Shoshone-Paiute Tribes. The SDEIS (p. ES-32) predicts "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." Historical traditional places of hunting, fishing, and gathering that are still used today will be adversely impacted by the operations of this project. Due to the overlap of the SGP footprint and traditional resource areas for the tribes, tribal members will be prevented from exercising their treaty-reserved rights of hunting, fishing, and gathering rights due to restricted access set by Perpetua Resources. This is unacceptable. Treaty rights must be respected, upheld, and given priority in the Forest Service's analysis of this project.