

Data Submitted (UTC 11): 1/4/2023 12:53:43 AM

First name: Mary

Last name: DeRiemer

Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment. The analysis of the project didn't address many of the issues thoroughly.

1) As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples of the area. Given the billions of dollars spent on Snake River salmon recovery, this project will likely desimmate the fish due to increase in stream temps. (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.)

2) As proposed, this project will result in the loss of over 120 acres of high-functioning wetlands. This affects water quality for humans as well as loss of wildlife who require wetlands to survive.

3) Let's get real. Although Perpetua prefers to present the SGP as a 'restoration' project, it is a massive industrial mine with three open pits, the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat. The expanded footprint more than doubles the previous disturbance of the Stibnite mining district. 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. The potential for a spill is much larger than the SDEIS portrays. Please address this.

3) 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.

4) 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.

5) 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. Thank you for this opportunity to comment.