Data Submitted (UTC 11): 1/4/2023 1:56:59 AM

First name: Ryan Last name: Blackadar

Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed at the headwaters of the South Fork Salmon River watershed. 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.

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 rlsk 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. I am concerned about the effects of the mine on the ESA-listed fish species in the East Fork South Fork Salmon River, South Fork Salmon River, Middle Fork Salmon River, and Main Salmon River from contamination. I am concerned about the contamination at the mine site, along the transport routes, and the downstream transport. The East Fork South Fork Salmon and South Fork Salmon Rivers are two of my favorite places in the world to observe Chinook salmon and bull trout. I love to snorkel in those rivers to to see fluvial bull trout and anadromous Chinook salmon in crystal clear water with very cool underwater geology. I am concerned that the actions of the mine will degrade the fish resources, water clarity, and my enjoyment of interacting with these precious species.

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. The proposed project is located in a sacred area of Idaho to many people including myself. I am concerned that the potential release of additional containments during mining disturbance in this unique area will have catastrophic effects to the natural resources and diverse group of people that enjoy the diverse recreational opportunities at the mine site, downstream of the mine in the East Fork South Fork Salmon and South Fork Salmon Rivers, and along the mine transport routes.

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. I am concerned that the storage of mine tailings will harm the natural resources and my enjoyment of this special place.

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. I am concerned for the impacts of spilling hazardous materials on the natural resources and local communities.

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. I am very concerned of the downstream impacts of SGP in the East Fork South Fork Salmon and South Fork Salmon Rivers. These two rivers are extremely special to me and I consider them to be my absolute favorite places to kayak in the entire state. If these sections of rivers are harmed by the mine, which I believe is not discountable because of the transport of hazardous materials downstream, than some of my most special rivers will be degraded and is not worth the risk.

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. I am concerned that the recreational opportunities downstream of the mine, in the East Fork South Fork Salmon and South Fork Salmon Rivers, will be negatively impacted and has the potential for catastrophic effects to recreation in the greater area. Please consider the effects of the mine to recreation in a greater area including the impacts of mining disturbance to downstream recreation.

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". I am concerned that the impacts of the mine on indigenous people that gather subsistence foods and pass on their culture to future generations within the impact area of the mine is too great a risk. Many indigenous people utilize Johnson Creek, East Fork South Fork Salmon, South Fork Salmon, and Middle Fork Salmon Rivers to harvest subsistence foods in areas that still hold those resources. The risk of indigenous peoples losing the ability to harvest foods (because of mining impacts and contamination by hazardous materials) is far too great and I do not believe is worth the risk.

I am concerned that if the natural resources and recreational opportunities are negatively impacted by the proposed mine, current and future generations of my family will be affected our family traditions may be altered.

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan. Please do not approve the mine.