

Data Submitted (UTC 11): 1/4/2023 2:38:10 AM

First name: Tess

Last name: McEnroe

Organization: Idaho Rivers United

Title: Communications Associate

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.

As a river guide in Idaho for the last 13 of 16 years of guiding, I am disgusted and appalled that this project is still on the table. The Main Salmon River, where the South Fork flows into, was my first river trip at age 9. It changed by life and brought me here today to advocate as a guide, river runner, steward, and concerned public citizen. I hope I get to show my children this place someday. We won't be able to if the Stibnite Gold Project continues to be a threat.

Here are my questions and concerns:

- Will you allow this mine to destroy one of the best remaining habitats for wild (endangered) chinook salmon and bull trout among other hundreds of species?
- Will you continue to allow this mine to violate tribal treaty rights, specifically to the Nez Perce people who have been in this area and relied on the place for time immortal?
- Will you go by an antiquated, ancient, out of date and touch mining law of 1872 to allow jurisdiction?
- Just because Perpetua Resources claims they will "clean up" this gold mine site, doesn't include the fact that it will DESTROY THIS HABITAT FOR 100 YEARS.

Specifically, I urge you to take a harder look at the SDEIS:

- On SDEIS p. 4-386: "DEIS Claims Irreversible Losses."
- Exceedance of Mercury, Arsenic, and Antimony, SDEIS pg. 2-147
- Decreased Cutthroat & Bull Trout Habitat, SDEIS pg. ES-19
- YES, 100 YEARS. Bighorn sheep will not return. Wolverines will never return due to the noise radius of up to 2 miles away of mining sounds and pollution. Wetlands where the mineral water will go will be sinking into the groundwater for decades, perhaps lifetimes. Bull trout will never swim here again. Native American children will not be able to fish with their elders and know their cultural rights.

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.

Moreover, Perpetua Resources is being shady and incredibly anti trustworthy about how their public comments are being submitted and recorded.

I AM QUESTIONING THIS PROCESS AND HOW YOU WILL RECEIVE AND COUNT THESE PUBLIC COMMENTS. PLEASE EXPLAIN THIS TO THE PUBLIC AND ALSO ALLOW FOR AN EXTENDED COMMENT PERIOD FOR THE PUBLIC TO CONTINUE TO DISSECT THIS INCREDIBLY COMPLEX AND IMPORTANT ISSUE TO THE STATE, LANDSCAPE AND SPECIES OF IDAHO.

By adhering to the The National Environmental Policy Act (NEPA), I hope the following is happening in terms of review to public comments:

- Environmental Impact Statement (EIS) required for federal actions significantly affecting the environment
- The [EIS] requirement ensures that federal agencies are informed of environmental consequences before making decisions and that the information is available to the public." Okanogan Highlands Alliance v. Williams, (9th Cir. 2000)
- Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho such as the Shoshone, Bannock and Paiute tribes have used the river for fishing and hunting for generations. Construction and operation of mine could negatively impact Tribal rights and resources. 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".

How will you communicate to the public that our comments have undergone this review?

Thank you for reading my comment and the thousands of others.

Please, I am urging you with my whole heart and soul to STOP STIBNITE MINE. DO THE RIGHT THING. GOLD IS NOT WORTH MORE THAN THE ENVIRONMENT.

Sincerely,  
Tess McEnroe  
Idaho Rivers United