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Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

My connection to this wild place, the watershed, and the fish that inhabit these waters has given me meaning, purpose, solace, identity, and a career as a guide. Help me and my children continue to love this place as one of the last strongholds of the wild and scenic, biologically intact and ecologically healthy areas left in Idaho and the world.

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 Endangered Chinook salmon and bull trout. Which are cultural, economic, and spiritual resources for Idaho residents, indigenous people, and avid anglers and visitors to the area. The mine will negatively impact all forms of recreation within the area and the extensive watershed downstream, some of which has been designated as "Wild and Scenic." The wild and scenic designation and protection will be blatantly ignored, disrespected and abolished if this mine continues to operate. Perhaps most upsetting, on a humanitarian lens, is the mine's direct harm and disregards for treaty-reserved rights and interests of the Indigenous peoples of the area, predominantly Nez Perce. The culture, history and identity of these people are deeply tied to this space that will be decimated by the mine.

Ecologically, The SGP will have adverse effects on Chinook salmon and bull trout. One of the many, yet most important duties of the forest service is to protect and maintain healthy ecosystems and endangered species. SGP impacts is in direct opposition to such goals. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk to the investment and effort to restore these species to a sustainable population. Stream temperatures are predicted to be critically 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.

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.

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