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Comments: Dear Forest Supervisor Jackson,

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed in the headwaters of the South Fork Salmon River. As proposed, this project represents unacceptable risks to Chinook salmon, steelhead, and bull trout listed under the federal Endangered Species Act (ESA); it will also negatively impact all forms of recreation in the area and harm treaty-reserved rights and interests of Native American Tribes in the area.

I have personally worked on salmon recovery in the Snake/Columbia basin for 30 years. I am especially concerned about the immediate and long-term impacts of the SGP on the recovery potential for wild Snake River chinook salmon and steelhead populations. NOAA and other federal agencies have stated that the South Fork Salmon watershed historically produced more summer chinook salmon than any other single source; biologists note that a full 30% of all adult summer chinook returning to the Columbia basin originated in the South Fork Salmon. With these salmon and steelhead populations still struggling to survive, even after 30 years of ESA-related work, any damage to (or reduction of) critical habitat is unacceptable. The USFS cannot justify or support additional risk by approving the mining plan proposed by the SGP.

Impacts on ESA-listed fish include: stream temperatures predicted to be elevated for up to 100 years within the mine site boundary (note that the SGP proposal understates the effects of climate change, making temperatures even higher); riparian habitat for these sensitive species will be reduced for decades, not enhanced; and the potential for acid mine drainage from the oxidation of sulfuric compounds in mining waste, and/or cyanide leakage into the watershed, is virtually certain given the history of failures in similar mining enterprises. Despite Perpetua's optimistic declaration and intentions, failures and long-term pollution are the rule - not the exception - for such projects. ESA-listed fish ought not face this additional risk; the USFS ought not allow it by approving this plan.

Further, 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 (and virtually certain) release of contaminants mobilized by mining and construction.

Although Perpetua prefers to present the SGP as a 'restoration' project, it is instead a huge industrial mine that will scar, damage, and degrade the landscape and the watershed for generations by creating three open pits, permanently storing over 120 million tons of toxic mine tailings atop previously undisturbed wetlands, and expanding the industrial mining footprint to more than double the size of the current disturbance.

Throughout the life of the mine, if approved, hazardous materials will be transported to and from the site. There are no risk analyses included in the SDEIS for local communities in the event of hazardous spills. This potential is much higher than the SDEIS portrays, and should be fully addressed by the Forest Service - for communities, watersheds, and landscapes.

As proposed, the SGP also raises concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). The project itself is located at the headwaters of the 'suitable' South Fork Salmon River, which feeds directly into the fully designated Main Salmon River. However, the scope of analysis does not acknowledge any potential impacts of pollution or sedimentation downstream from the mining site. I note also that Johnson Creek and Burntlog Creek, both eligible under the WSRA, would be significantly degraded by sedimentation or any toxic spill. These risks are unaddressed.

Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce Tribe and other indigenous peoples of Idaho. The SDEIS clearly acknowledges "...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 ESA-listed fish, by rejecting the proposed Stibnite mine plan. The interests and legal requirements of tribal treaties are compelling, beyond the virtually certain damage to and destruction of critical habitat for ESA-listed salmon and steelhead. Federal obligations -- legally, morally, and environmentally -- require rejecting the SGP proposal.

Regards, Tom Stuart, Boise