Data Submitted (UTC 11): 1/8/2023 1:51:39 PM
First name: Gary
Last name: Lane
Organization: Wapiti River Guides
Title:
Comments: Dear Supervisor Jackson:

The following comments on the SGP come from my perspective as a local resident of Riggins, an outfitter/guide on the Salmon River since 1975, and a wildlife biologist for the USFS on the Wallowa Whitman in the early 1970s. Naturally, being downstream of any huge earth moving project has the very real potential for giant catastrophic repercussions to my backyard and livelihood. Based on a plethora of evidence from pipeline oil spills, boating and trucking accidents, to various toxic mining leaks around the globe, in addition to erosive forces of previous timber liquidation sales and road building in the South Fork/East Fork watersheds, the threat of serious negative consequences to multiple natural resources is too high a risk to accept further accumulated depredations from allowing the SGP.

With a simple research of history, and a background in fish and wildlife science, it is not necessary for me to wade through ever more reams of analysis in the SDEIS to simply object to the proposed SGB. Of major concern is the accumulated impacts of incremental death by a thousand cuts and the continued human acceptance of a shrinking foundation due to the shifting baseline syndrome. Incrementalism - ie, the grass turns from spring green to fall brown at a rate so slow it is hidden from view by the human eye, but occurs all the same. Incrementalism also holds true with abusive extractions of natural resources. Impacts by a thousand cuts result in the same end as does death by a heart attack, but happens at a rate that goes on unnoticed until it is too late. Corporate and regional short term economic gain, comes with long range resource drain and robs future generations.

Changing the name from Stibnite to Perpetua is deception, and merely a red flag PR stunt to hoodwink people into believing snake oil will cure any economic woes, and thus undermines public trust. Multiple use of natural resources is not the same thing as equitable use. If the extraction of one major resource exacts a cost too detrimental to the integrity and vitality of other natural resources, the cost is too high to justify the project. Mining by Perpetua in this area is a prime example of exploitation of one resource at the drastic expense of many others.

Half of my livelihood depends on healthy runs of anadromous fish, and half comes from recreation, so the potential impacts from SGP gravely concerns me. I attended the ground zero dam removal hearings in Lewiston when they first began in the year 2000. At that time, the decision was made to ignore one of the 4-Hs (hydro) that was recommended for fish recovery. To this day we are still advocating for removal of the four Snake River dams. We were told that it was more important to focus on the other 3 H's: Harvest, Hatcheries, and Habitat. Of those three, Habitat is the one that is most impacted by the Perpetua Project. Why should they be allowed to build roads that change the character and integrity of vital spawning habitat, not only to anadromous fisheries, but landscape requirements for other wildlife species as well?

Before guiding, I worked as a wildlife biologist on the Wallowa Whitman when serious studies were first started on the impacts of roads to habitat effectiveness on big game. Roads impact animal behavior and increase access for hunters, closed or not. They also eliminate physical habitat by paving the ground with asphalt or gravel. It is why what little remains of the roadless areas that now exist is so important to protect. Integrity of the spawning grounds in these areas is critical to anadromous fishery that is migratory and serves other states, cultures, and species besides just in Idaho. Several Indian nations and over 137 different species rely on anadromous fish during some phase of their life history.

There are over 28 distinct population segments of salmon that are listed as threatened or endangered. The

Endangered Species Act does not protect just distinct biological species, but there is a clause that also protects distinct population segments. It is vitally important to conserve this subspecies of diversity because they have adapted to distinct geographical areas. As climate changes with lower regions warming waters more than upper areas, these cooler higher elevation
spawning grounds become even more important.

Perpetua claims they will improve the area disturbed by previous mining activity that turned the rivers inside out to search for gold. It is akin to changing from cigarettes to cigars in order to cure cancer. On the balance scale of nature, with the natural economy of salmon on one side and the profit motive of mining on the other, true equity for the environment is to protect our remaining pristine habitats intact and not allow any more development that erodes the integrity of the genetic pool of wild salmon and steelhead that is the baseline for all supplemental hatchery fish.

Discovery of gold while trespassing on Nez Perce 1855 Treaty lands had similar impacts to the Nez Perce people, as did the Doctrine of Discovery used by the United State Government to subjugate Indian people and separate them from their original homelands. While the treaty (breaking of) was the legal instrument used to steal land from the native people all across the nation, it was a disgraceful form of genocide that stains human history. However, the dominant culture of today now has a chance to restore honor and respect by how we share and protect natural resources with the original inhabitants.

Enough incremental environmental atrophy is enough. When a boat is loaded at full capacity, adding just one more person will sink it. It is time to say no to adding any more large scale industrial mining projects in this area, and to say yes to saving what we can for our anadromous fisheries, wildlife, and future generations. And it is our chance to help restore honor to the treaties that the dominant culture broke and/or ignored for so long. Denying the SGP is this generation's moral opportunity to help restore Environmental and Indigenous Justice from past atrocities and eliminate potential future calamities.

All things are interconnected. All relationships are in relationship with everything else on Mother Earth. Large scale mining disrupts the blood flow.