

Data Submitted (UTC 11): 1/8/2023 8:23:05 PM

First name: Jessie

Last name: Longe

Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

As a Middle Fork and Main Salmon River guide, avid whitewater kayaker, and steward of these lands, I appreciate the 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. I'm asking you to choose the No-Action alternative, conduct more studies, and protect against mining destruction.

As proposed, this project

1. will certainly cause irreversible damage to the ecosystem and it violates the Clean Water Act
2. disregards treaty reserved rights and interests of the Indigenous peoples of the area
3. violates the Endangered Species Act; harming the Chinook salmon and bull trout populations
4. puts local communities such as Valley County at risk of hazardous material spills
5. violates rivers downstream that are protected by the Wild and Scenic Rivers Act
6. negatively impact all forms of recreation within the area

The proposed SGP is a massive cyanide leach gold mining operation, which would double the area of land disturbance at the site, from 1,593 to 3265 acres, including the excavation of three open pits, and generate an estimated 400 million tons of additional mine waste that will remain on the landscape in perpetuity - creating a permanent source of potential pollution within the watershed.

The proposed mine is also predicted to harm the traditional lands of indigenous peoples, such as the Nez Perce Tribe, including harm to treaty rights, 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.

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.

The information provided within the Supplemental Draft Environmental Impact Statement (SDEIS) is also inadequate to analyze the potential impacts of the project. Missing information includes: basic engineering specifications and analysis of the tailings dam, sediment modeling, a detailed analysis of the autoclave, details and analysis of proposed underground exploration (Scout Prospect Tunnel), designs of the transmission line upgrades and new construction, detailed reclamation plans, and an analysis of the effectiveness of any proposed mitigation measure.

Lastly, there is no need for a gold or antimony mine at this time. There is an abundance of gold in the United States, which is primarily used for hoarding-not any useful technologies. Also, even if antimony is not currently mined as a "primary" by-product of a gold mine, there are known substitutes for its primary use, which is as a fire retardant in clothing and furniture. Antimony's use in weaponry is an insufficient justification for what is really a gold mine. If this really is an antimony mine, then the project footprint can be much smaller as the mining could be conducted underground.

For all of the reasons listed above, I ask the USFS to protect the Salmon River watershed and reject the Stibnite Mine plan. Thank you for reading,

Jessie Longe