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Comments: In late October of 2022, the Forest Service released the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP) as proposed by Perpetua Resources. Located just a few miles east of Yellow Pine, this project places one of Idaho's most biologically diverse watersheds in extreme danger.

Perpetua Resources intends to nearly double the footprint of the historic mine area, using three open-pit mines and cyanide leaching to extract gold and antimony in the headwaters of one of Idaho's most iconic waterways - the South Fork of the Salmon River.

Spawning habitat for bull trout and chinook salmon, abundant recreational opportunities, as well as deep cultural ties and treaty-reserved resources for the Nez Perce and Indigenous communities of the region are all at risk if this project is approved.

While we begin to evaluate the SDEIS, there are significant issues of immediate concern: increased risk of heavy metal contamination, stream temperature increases, and general loss of critical ecosystem function and habitat. Against the backdrop of ongoing salmon recovery efforts, recreational values and access, and the broad negative impact to the environment, this project represents an unacceptable risk to our public lands.

The SGP has been a highly complex and controversial proposal from the start. The Forest Service has decided to produce the SDEIS in response to project design changes that fell outside of the typical NEPA process. This highlights concerns that the experience and expertise that Perpetua brings to this scale of project is unacceptable.

Perpetua's plans include broad mitigation measures to "restore the site," however, the notion that additional mining is required in order to do so is simply bad policy and science. Even with the proposed measures, there will be permanent damage to critical fisheries, specifically bull trout, and water quality.

"The 2021 MMP would have direct permanent impacts on water quality, as it would contribute new sources of mine waste material to the East Fork SFSR drainage." (SDEIS ES-18)

"Post-closure, a net decrease in quality and quantity of bull trout habitat would occur despite removal of passage barriers and an increase of lake habitat for bull trout..." (Fisheries Specialist Report p. 150).

The reality is that almost all mines of this size end up polluting water supplies with cyanide, diesel fuel, or other contaminants. The headwaters of the East Fork South Fork Salmon River, and its importance to salmon recovery, are far too valuable to be placed in jeopardy at the expense of a profit driven gold mine.

The Nez Perce Tribe, Forest Service, and EPA have already invested millions of dollars to address the pollution at Stibnite, and had secured millions more for further efforts, before the claims were purchased by (then) Midas Gold. This process would not happen overnight, but the desire and initiative to clean up the site without the risk of additional long term damage must be explored.

"The notion that it will take a mine, and mining dollars, to clean up this site is irrational. Over \$75 million has been spent in the Lemhi Valley on conservation projects and salmon recovery to date. Many of the funding streams for these projects are applicable to the Stibnite area, especially for fish recovery," said Nic Nelson, Executive Director, Idaho Rivers United.

In addition to the serious concerns regarding stream temperature increase, heavy metal contamination, and general harm to ESA listed species, this project also will result in a restriction of public access to over 14,000 acres during the 20-year lifespan of the mine and subsequent restoration.

"Recreation opportunities within the Operations Area Boundary would be eliminated until after reclamation."
SDEIS 2-160

"In this area, public access would be prohibited, or restricted through such measures that are accepted as means to control public access (EPA 2019a) such as security checkpoints, and security surveillance patrols." SDEIS 3-30