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Comments: 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.

Before I begin, I ask you to hold in mind two questions. First: what is gold really worth? And second: what should the U.S. Forest Service --entrusted to administer public lands in the interest of the American people-- be willing to sacrifice in exchange for that gold? How great a risk to our cherished public lands and natural resources is acceptable?

I have been a river guide since 2010, and an Idaho guide for five of the last 13 years. In addition to relying on healthy, functioning river ecosystems to make my living, I also value these places immensely for personal recreation like kayaking, fishing and backpacking. The South Fork Salmon River stands out as a crown jewel among the west's multiday river trips, and I (and many of my friends) make annual trips to paddle it during spring runoff, or to fish its waters in the fall. And in 2022, myself and two friends dedicated three full months to kayaking the length of the Salmon River to the Pacific Ocean-- focused specifically on protecting these watersheds from poorly planned development projects like the SGP. As proposed in the SDEIS, the Stibnite Mine poses unacceptable impacts that threaten not only these recreational opportunities (the SDEIS arbitrarily analyzes impacts to recreation solely within a 5-mile radius of major mine features) but the reserved treaty rights of Indigenous peoples and the long-term health of the watershed-- and those downstream.

Please consider the following.

From an environmental standpoint, the projected impacts of the SGP on the immediate watershed and its fish and wildlife are many and severe. Perpetua prefers to present the SGP as a 'restoration' project. It is, however, a large-scale industrial mine that will scar and degrade the landscape for lifetimes to come. Perpetua proposes 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.

Specifically, I urge you to take a harder look at the SDEIS:

- On SDEIS p. 4-386, the statement claims "Irreversible Losses."
- Exceedance of Mercury, Arsenic, and Antimony are noted on SDEIS pg. 2-147
- Decreased Cutthroat & Bull Trout Habitat are detailed on SDEIS pg. ES-19

The 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. Elevated stream temperatures are predicted in the SDEIS for up to 100 years within the mine site boundary. 100 YEARS. As proposed, the project will have unacceptable adverse effects on endangered Chinook salmon and bull trout. Given the BILLIONS of dollars spent on Snake River salmon recovery to date, the proposed SGP flies in the face of massive investment and effort to restore these species to sustainable population numbers. Perpetua claims the SGP as a restoration project. Nothing in the SDEIS, however, suggests that habitat for sensitive species (several of which are federally listed as Endangered) will improve as a result of the project. Quite the opposite is apparent.

Additionally, The effects of climate change will exacerbate the impacts the SGP will have on the environment. These effects 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 of the project. Such a cursory and flippant consideration of climate change in a major

mining proposal is beyond concerning.

Heaped on top of glossed-over environmental impacts, the SGP flagrantly disregards the treaty-reserved rights of the Nez Perce and other Indigenous peoples of Idaho, such as the Shoshone, Bannock and Paiute tribes, which have used the river for fishing and hunting since time immemorial. Construction and operation of mine would negatively impact Tribal rights and resources. The SDEIS clearly outlines "[a]dverse 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".

Additionally, there will be negative effects on the area's non-Tribal communities which result from the proposed SGP. Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County. There are, however, no risk analyses examining the effects on local communities should a hazardous spill occur. The potential exposure of these communities to hazardous spills is much larger than the SDEIS portrays and must be addressed by the Forest Service.

From a legal standpoint, the SGP raises numerous concerns for rivers protected under the 1968 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 catastrophic toxic spills if this project moves forward. Many additional concerns arise from the certain (but also glossed-over) impacts to species listed under the 1973 Endangered Species Act. And finally, acceptance of this project as currently detailed in the SDEIS could undeniably be deemed arbitrary and capricious under the 1969 National Environmental Policy Act.

In regard to my opening questions, I ask that you honestly and thoroughly consider them as you review the SDEIS. What stands to be gained from the SGP in gold pales in comparison to what stands to be lost. I hope that, someday, my children will know the joy of paddling the South Fork of the Salmon. That they will witness the wonder of seeing restored Chinook spawning in the headwaters. I hope that the children and grandchildren of Tribal people will retain their abilities to hunt, fish and gather in this corner of their ancestral homelands. The Forest Service's decision should be straightforward. I implore you to ACT IN THE INTEREST OF THE AMERICAN PEOPLE, NOT A CORPORATE BANK ACCOUNT. DO THE RIGHT THING.

Sincere thanks for your time and concern,

Elizabeth Tobey