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Title:

Comments: Dear Decision Makers,

Thank you for the opportunity to comment on the Stibnite Gold Project Supplemental Draft EIS. I am a resident of eastern Washington state living downstream of the proposed mine. I worked for many years as a guide on the Middle Fork and Main Salmon rivers and I still return frequently to recreate in the Frank Church-River of No Return Wilderness, in Valley County and in other parts of the Salmon River watershed. I am very concerned that the proposed project will harm my water quality, regional fish populations and recreational opportunities. I urge the Forest Service to select the No Action Alternative, or else to analyze additional alternatives to the proposed action.

My biggest concerns with the Stibnite project are for fish populations. At a time when low returns of Snake River wild salmon and steelhead are causing major concern and controversy and prompting calls for extreme measures such as dam breaching that would have major effects on the regional economy, additional risks and impacts to fish populations and habitats are simply unacceptable. The South Fork Salmon supports steelhead, salmon, bull trout and cutthroats, three of which are designated federally threatened, but the SDEIS mentions irreversible losses to all these fish. Perpetua claims Stibnite is a fish and watershed restoration project, but the SDEIS indicates that stream temperatures will reach potential lethal levels and that the project will negatively impact these species. How can this be considered a restoration project if these are the impacts? The proposed mitigation measures (e.g. tunnel, trucking) that are speculative and uncertain. Furthermore, the SDEIS does not evaluate risks from trucking of hazardous materials in other regional watershed such as the Little Salmon and the North Fork Payette. Why are effects of HAZMAT transport via Highways 95 and 55 not evaluated in the SDEIS?

A close second on my list of concerns is for regional water quality. Right now, my county (Whitman County, WA) is considering long-term plans to augment its water supplies in the face of a declining local aquifer. Prominent among those proposals are plans to acquire water from the lower Snake, downstream of the Stibnite project. Population growth and demands on water resources are expected to continue in our region throughout the 21st century. In the face of these water needs, additional risks to water quality are unacceptable. And yet, the SDEIS predicts that mining activity will exceed water quality standards or worsen existing conditions. And again, the SDEIS neglects to analyze risks of transportation-related spills of hazardous materials along Hwy 95 in the Little Salmon drainage.

As an active recreationist and former outdoor guide, I am also very concerned about impacts to recreation and scenic values. When I worked as a guide in the area, our clients were universally attracted by the water quality of the rivers, the fishing and sense of isolation and remoteness, all of which face negative impacts from the proposed action. The SDEIS neglects to consider impacts on Outstandingly Remarkable Values of the Wild and Scenic Main Salmon and Middle Fork Salmon rivers, or on the South Fork Salmon which has been deemed suitable for Wild and Scenic status. Light pollution, dust and increased access also threaten to impact values of the Frank Church Wilderness and the Idaho Centennial Trail for many years.

It is also highly concerning that the SDEIS neglects to consider alternatives other than No Action or Perpetua's mine plan, which is the same in both alternatives. Why was a broader range of alternatives not considered? The Forest Service needs to consider alternatives that include a smaller mine footprint, underground-only alternatives, complete backfilling of mine pits, potential ramifications of early closure, a restoration-only alternative and an alternative in full compliance with current Forest Plans. The fact that the proposed action would require multiple changes to current Forest Plans should be a red flag that the alternatives under consideration in the SDEIS are not sufficient.

The proposed Stibnite Gold Project offers very little in benefits to the local region or to Forest conditions, while its negative impacts and risks are enormous and insufficiently analyzed in the SDEIS. I strongly urge the Forest Service either to choose the No Action Alternative or to consider more alternatives, explore more mitigation options and conduct further study to make this decision on a fully sufficient basis.

Thank you for considering my comments.

Respectfully,  
Andrew J. Frishman  
Albion, WA