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First name: Juanette Last name: Cremin Organization:

Title:

Comments: Thank you for accepting my comments on the Perpetua Stibnite Gold Project currently under consideration in the Salmon River drainage.

Requirements for "substantive comments" aside, it is an environmental no-brainer to deny the Perpetua Stibnite Gold Project now and in future proposals.

Since the imposition of the 1872 General Mining Act, the mining industry has proven over and again it cannot be trusted to act responsibly toward the federal lands on which they operate. Contamination of air, streams, groundwater, and soil are a common happenstance connected to the bulk of mining operations. Disregard for the life and well-being of the populations calling the site "home," both human and wildlife, is immediate and ongoing. Disruption of migration routes and flyways must not be ignored.

In the case of the South Fork Salmon ecosystem, these impacts carry over to recreational use as well - both in the forests and on the rivers flowing through the proposed area. 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, which is a ridiculously inadequate limit, 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.

Similarly, throughout the life of the mine, hazardous materials will be transported to and from the site through the communities of Valley County, yet there are no risk analyses of expected impacts on local communities when a hazardous spill occurs. In addition potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service.

Perpetua prefers to characterize the Stibnite Gold Project as a restoration project. In reality, however, it is a massive industrial mine that will leave the area a moonscape for generations to come. Among the adverse proposals are the creation of three open pits, and the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat. Tailing ponds have a poor track record as seen in two examples in Colorado: (1) Summit County's Snake River in the '70s, when upstream, historical tailings released killing fish species beginning to recover after decades of mining activity in the drainage in the early 1900s. (2) There is also the accidental spill impacting the Animas River, earlier this century.

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, including an expanded footprint that more than doubles the previous disturbance of the Stibnite mining district.

The Stibnite Gold Project will have adverse effects on Chinook salmon and bull trout. Given the billions of taxpayer 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. A further impact of the Stibnite Gold Project is the predicted stream temperature being elevated for up to 100 years within the mine site boundary. The habitat for these sensitive species will be worse, not better, as a result of this project.

The negative impact of the Stibnite Gold Project on the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho cannot be ignored. The SDEIS clearly recognizes the adverse 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. No minor issue, and it MUST be addressed.

It is for these and many other concerns, both personal and environmental, I call on the United States Forest Service to step up and protect the Salmon River watershed and the streams and rivers it feeds and reject the Stibnite Gold Project.

Thank you for your consideration