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First name: Judy Last name: Secrist Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project proposed at the headwaters of the South Fork Salmon River watershed. As proposed, this project represents unacceptable risks to water quality and fisheries and completely ignores the effect of climate change.

Both of the alternatives proposed have the potential to release heavy metals that would deteriorate surface water as well as groundwater. Operations are also anticipated to increase the water temperatures. And most disturbing is that water temperatures are not expected to return to baseline levels for approximately 100 years. By that time irreversible damage to the ecosystem will have already taken place and may result in the loss of native species. In addition, the creation of impermeable liners will permanently remove six wetland areas. This alteration in groundwater connectivity is expected to have an adverse impact on the flow and recharge of streams and wetlands in the area of the project. It is anticipated that either of the alternatives would result in the loss of 120 acres of currently high-functioning wetlands.

The project will cause such degradation in water conditions that both resident fish and migratory fish will find their survival threatened. When one considers that water temperatures are predicted to be elevated above the existing baseline conditions for up to 100 years, the extinction of some species is a likely outcome. This is of particular concern for Chinook salmon, a species that is already struggling.

The effects of climate change will exacerbate the impacts the project will have on the environment. The Forest Service points out how climate change alongside the activities in the project could harm the physical, biological, and social resources on the mine site and surrounding areas. The exact wording of the Environmental Impact Studies states:

"Changes in hydrologic patterns and overall increasing temperatures are expected to result in decreased or degraded soil moisture and quality, air quality, annual streamflow, groundwater recharge, and water quality. Increased surface water temperatures; increased spread of insects and diseases; changes in the timing, duration, and severity of fire seasons; as well as habitat loss and fragmentation also are expected to occur. Closure and reclamation activities under the alternatives could reduce climate change impacts by improving soil quality and implementing best management practices during all phases of the SGP"

It should also be noted that this is the extent that climate change was considered in any of the analyses is essentially limited to this solitary statement. The forest service failed to use any models that represent possible future climate variations when projecting stream temperatures.

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

Sincerely, Judy Secrist