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Title:

Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Stibnite mine, proposed at the headwaters of the South Fork Salmon River watershed. This project as structured will negatively impact all forms of recreation within the area, including the high quality whitewater boating that the South Fork Salmon River is known for. Whitewater paddlers travel long distances to enjoy the clean, clear water within this formidable wilderness run.

The Stibnite mine will also have adverse effects on Chinook salmon and bull trout by elevating stream temperatures for up to 100 years, especially as the climate generally warms. Climate change effects were inadequately incorporated. While briefly acknowledged, the compounding impacts of a warming climate were not taken into consideration when predicting stream temperatures or other environmental impacts that are intrinsically linked to a changing climate. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk to investments in restoring these species to sustainable populations.

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.

Although Perpetua prefers to present the Stibnite mine as a 'restoration' project, it is not. This operation is a massive industrial mine that will create three open pits, permanently storage more than 120 million tons of toxic mine tailings above previously undisturbed wetland habitat, and expand by double previous mining district footprint. This will leave the landscape unrecognizable.

Throughout the life of the mine, hazardous materials will be transported to the site through Valley County. The risks to community residents from hazardous waste spills were not analyzed and thus are being downplayed by the Forest Service.

The Stibnite mine raises numerous concerns for rivers downstream that are protected under the 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. With a robust permit system and tens of thousands of visitors annually, the Main Salmon River is a unique river recreation designation and source of tourism for a remote part of Idaho. The scope of analysis does not include any potential impacts that extend downstream to these sections of protected river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if the mine is approved.

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 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.

Finally, the Stibnite mine will negatively impact the treaty-reserved rights of the Nez Perce Tribe. The SDEIS clearly states that "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".

From recreation to fisheries, nearby rural communities, traffic patterns and Indigenous people, the impacts from this project are substantial and exclusively negative. These impacts provide a compelling case for the Forest

Service to instead protect the Salmon River watershed by rejecting the proposed Stibnite mine plan.