

Data Submitted (UTC 11): 1/10/2023 3:33:43 AM

First name: Dr. Irwin

Last name: Mulnick

Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

As a resident of McCall, a physician, and a local business owner for over 30 years I would like to summarize my most serious concerns regarding the SGP.

They are as follows:

Environmental effects to rivers, wetlands and native species.

Treaty rights of the Native populations.

Potential for catastrophic pollution to the surrounding area and communities that could be impacted by a spill.

The impact on the the South Salmon River, the Main Salmon and areas in and around The Frank Church WONR.

The farce that the SGP is cleaning up the old Stibnite mine pollution only to then mine and pollute and destroy a larger area than previously impacted. (Excuse my rant)

Additionally, I included part of the letter from the Idaho Rivers United that sums up many of my other concerns that I feel strongly are valid arguments to deny the forward progress of the SGP.

PS. I moved and have lived here over half my life for the beauty, nature, lack of pollution, abundance of wildlife and scenery, and recreational opportunities, and do not think that a huge polluting and land destroying mine aligns with or is in accordance with what Valley County stands for.

Thank You, Dr. Irwin Mulnick

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. As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples of the area.

Given the billions of 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.

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 SGP as a 'restoration' project, it is a massive industrial mine that will leave the landscape unrecognizable and degraded for lifetimes to come through 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.

Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County, but there are no risk analyses on local communities if a hazardous spill were to occur and the potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service.

Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples

of Idaho. 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".

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