

Data Submitted (UTC 11): 1/10/2023 3:38:22 AM

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Comments: 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 - damaging local economies based around recreation tourism and the livelihoods of people who make a living off of this recreation and tourism, and harms treaty reserved rights and interests of the Indigenous peoples of the area.

The SGP will have adverse effects on Chinook salmon and bull trout. 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. Increasing stream temperatures already pose a threat to this sensitive species and this proposed mine will only impair water quality (through increased erosion/sedimentation and additional contaminants mobilized by mining) and degrade high functioning habitat for these species.

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. We cannot regain the high functioning lands and critical habitats that will be lost with this proposed project.

The effects of climate change will exacerbate the impacts the SGP will have on the environment and were inadequately incorporated into the SDEIS. 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 the climate such as drought or extreme weather events.

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.

As proposed, the SGP raises numerous concerns for rivers 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. However, the scope of analysis does not include any potential impacts that extend downstream of the site boundary to review these sections of river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if this project moves forward.

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.

It's no secret that the South Fork Salmon is river that draws in the attention of anglers and whitewater recreationalists nationally, if not globally. I'm concerned that contaminants leaching from the mine or if a spill occurs - which it statistically will - will harm both human and aquatic health if water or species are ingested. As a kayaker, being so close to the water means that it is in our nose, mouth and eyes. Anglers and mammals that rely on a diet of fish will likely feel the effects of chemical contaminants that bio-accumulate in fish bodies.

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 cannot urge the Forest Service enough to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

Thank you