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Comments: Thank you for taking the time to read public commentary regarding the Stibnite Mine Gold Project. The effects of this project will outlive us all and it is my hope that any decisions regarding this mine are made with deep care and consideration for the broad range of values that exist within this watershed.

Within the SGP footprint, critical habitat for ESA-listed chinook salmon, steelhead, and bull trout exist. Interagency efforts are underway to restore these species across their historic range which includes the South Fork of the Salmon River. As someone who has worked as a wildlife biologist in habitat for these same ESA-listed species, this poses many well informed concerns. In particular, stream temperatures are predicted to be elevated above existing baseline conditions for up to 100 years when vegetation can reestablish adequate shade (SDIES ES-15). Based on what science knows about average lifespan and reproductive strategy across these species, it is obvious that irreversible damage to the ecosystem and native species of the watershed will have already taken place. For chinook salmon in particular, this project will result in the temporary or permanent displacement of the species from the project area (SDEIS ES-19) due to habitat conditions reaching unsuitable conditions. The SDEIS asserts that at the end of the project there would be a "net decrease in both quantity and quality of habitat for bull trout and westslope cutthroat trout," (SDEIS ES-19). Both action alternatives also involve the removal and disturbance of mineralized materials that could release heavy metals and ions that would deteriorate surface water resources and groundwater chemistry. In failing to maintain overall habitat quality and availability for these species, the proposed alternatives of this plan go directly against recovery efforts and laws surrounding their ESA listing.

The negative effects that this project would have on the water quality of surface and ground water should be of the utmost importance. It is expected that the groundwater levels will be reduced as a result of pit dewatering and the creation of impermeable liners under the Yellow Pine, West End, and Hanger Flats pit areas. The communities surrounding these areas should not be subject to the decrease in water quality and availability as the result of the private gain enabled by either of the proposed alternatives. The same liner system will be used under the tailings storage facility (TSF) and TSF buttress which will permanently remove six wetland areas within the mine site. Both Alternatives would result in the loss of 120 acres of diverse, high functioning wetlands within the mine site and 619 acres of riparian areas. Off-site, this loss differs between the Burnt Log Route Alternative (76.3 acres lost) and the Johnson Creek Alternative (71.2 acres lost). In addition, the previously undisturbed and high-functioning wetlands of the upper Meadow Creek valley is slated to be the site of the SGP tailings dump where millions of pounds of mine waste will inundate the valley floor.

This area is also an extremely valued public land area for its recreation. Unfortunately, under the proposed plan, the roughly 14,000 acres that comprise the general SGP area boundary will be closed to all recreational pursuits for over 20 years. This is an unacceptable side effect to the American public.

The SDEIS also fails to incorporate any sort of downstream analysis. The South Fork Salmon River which feeds directly into the Wild and Scenic Main Salmon River. Any negative impacts to water quality as a result of the SGP stand to influence the private boaters who float this stretch of river annually as well as the 33 licensed outfitters who operate commercial float and fishing trips along this stretch of protected river. The Middle Fork of the Salmon River and the Main Salmon River are both protected under the WSRA and could face the far-reaching impacts of this mine. Light, visual, water, and dust pollution are direct effects that could harm ORVs on the Middle Fork of the Salmon. The Main Salmon is at risk of any pollution that contaminates the South Fork of the Salmon (SFSR) and the East Fork South Fork of the Salmon (EFSFSR) as their water flows into the Main Salmon. Both the SFSR and the EFSFSR lie near the access routes and the area of operations. Another series of inexcusable side effects if this project were to continue.

In addition to the ESA-listed fish species mentioned earlier in my comment, there are four more species are either listed, proposed, or a candidate to be protected under the Endangered Species Act (ESA) in this area: the Canada lynx, Northern Idaho ground squirrel, wolverine, and Monarch Butterfly. The Proposed Action and the Johnson Creek Alternative will displace wildlife species by causing disturbances from light, noise, fugitive dust, and increased human activity.

The Johnson Creek Alternative would remove about 3,096 acres of wildlife habitat, while the Preferred Alternative would remove 3,266 acres. In addition to the general loss of habitat and disturbances, habitat fragmentation is also a major concern due to the mine and road construction plan. These changes to wildlife would not be short-term as the lifespan of the project is estimated to be more than 20 years. With prolonged disturbance, some of the wildlife species may not return to this area and be permanently displaced. The SDEIS asserts that "No significant issues were identified for wildlife and wildlife habitat," (Wildlife Specialist Report, p. 25). However, their analysis admits that construction and mine operations will disturb and harm wildlife in this area, including the ESA-listed species.

Last, I will point out that the SGP is within the traditional homelands of the Nez Perce, Shoshone-Bannock, and Shoshone-Paiute Tribes. The SDEIS (P. ES-32) predicts "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." Historical and traditional places of hunting, fishing, and gathering are still used today by tribal members. These extremely important lands and waters will be adversely impacted by the operations of this project. Due to the overlap of the SGP footprint and traditional resource areas for the tribes, tribal members will be prevented from exercising their 9 treaty reserved rights of hunting, fishing, and gathering rights due restricted access set by Perpetua Resources. The harm to fish, wildlife, and habitat will directly decrease the availability of resources to the Tribes which puts the proposed plans in direct violation of their tribal rights. Some of the most important resources to the local tribes are the endangered salmon and other fish species that reside in this area. The SGP will negatively affect these fish species and their habitat. Additionally, this project has serious implications to the millions of dollars that the Nez Perce Tribe has invested in salmon recovery and watershed restoration within the South Salmon drainage. Treaty rights must be respected and upheld and given high priority in the Forest Service's analysis of this project.

For these reasons, I recommend the no action alternative. I do not support further development of this mine and hope that direct effort is taken to prevent (and rehabilitate) any further environmental degradation as a result of this project. Thank you for your time. Our future is in your hands.