Data Submitted (UTC 11): 1/10/2023 7:16:00 PM
First name: Michelle
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Organization:
Title:
Comments: Dear Forest Supervisor Jackson,

I was born and raised in Idaho and have made McCall, Idaho my home for the past six years. My family and I camp, backpack, boat, hike, backcountry ski, and go birding in the South Fork Salmon River watershed and surrounding areas. I appreciate the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project. The action alternatives of the SDEIS do not adequately mitigate the many environmental issues caused by the proposed mine.

1.) The project is an unacceptable risk to Chinook Salmon. "The direct mortality of fish would be an irreversible impact that could occur under the Action Alternatives…Species subject to potential irreversible losses include Chinook salmon, steelhead trout, bull trout, and cutthroat trout (SDEIS-436)." Given the precarious recovery efforts regarding Chinook Salmon, these irreversible losses are unacceptable. The action alternatives fail to protect fisheries. Furthermore, the longterm projected increases in stream temperatures due to mining activities will adversely impact fish habitat far beyond the initial disruptions. These unacceptable temperature increases will only be further exacerbated by climate change, making long-term stream and fisheries health difficult, if not impossible, to achieve.

2.) The SDEIS does not adequately consider, nor address, climate change. The SDEIS fails to comprehensively account for all the greenhouse gas emissions related to the mine for the entire life of the mine and cleanup activity. Furthermore, the SDEIS undervalues the local GHG emissions impact. Rather than using the United States, and the state of Idaho, as references for climate emissions, the SDEIS should consider mining emissions in light of local emissions (i.e. county or nearby towns' output). This is a more valid comparison that clearly demonstrates the substantial increase the SGP will cause in local GHG emissions.

Likewise, the action alternatives fail to require appropriate GHG emissions mitigation strategies. For example, the use of electric haul trucks, investments in renewable energy to offset energy consumption, and green employee housing could all mitigate SGP GHG emissions. There are many more measures that should be considered.

Finally, the SDEIS does not adequately consider the implications of climate change in regard to mine infrastructure and emergency planning. Recent experience, i.e. the current storms in California, demonstrate that abnormally high levels of precipitation can destroy waste dumps, seepage capture systems, destroy mine access roads, cause impoundments to overflow, or cause releases of untreated water. The SDEIS must do a better job of incorporating climate change prediction models into the action alternative plans. Likewise, the SDEIS fails to anticipate, and offer emergency contingency plans, in the case of wildfire, another eventuality wrought by climate change. Climate change poses an existential threat. It is past time that Perpetual and planning processes seriously address climate change impacts.

There is only one alternative in the SDEIS that adequately protects our climate, fish, wildlife, and home. I strongly urge you to choose the "No Action" alternative. It is the only conscionable choice.

Thank you,

Michelle Blank