Data Submitted (UTC 11): 1/10/2023 11:18:24 PM First name: Abigail Last name: Urbanek Organization: Title:

Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project. Like many other Idaho residents, I love recreating around McCall and hold so many of the values that the South Fork Salmon River watershed provides close to heart - clean air, clean water, public lands, wildlife habitat, room to play and be in nature, and more. The Stibnite Gold Project as proposed poses too great of a risk to these things, which is why I urge the Forest Service to reject this plan.

Although this area already suffers from historic mining pollution, we do not need a new mine to restore it - we just need an actual restoration project. Although Perpetua is trying to paint a picture that this is a restoration project, l've never heard of a restoration project that includes cyanide vat leach mining, or the disturbance of pristine and previously undisturbed areas, the permanent storage of millions of tons of toxic mine tailings, and a bigger footprint left behind than before.

When it comes to Idaho's beloved and iconic fish, this project as proposed poses unacceptable risks, especially to Chinook salmon and bull trout. The Forest Service's own SDEIS highlights these concerns, stating: "Post-closure, a net decrease in quality and quantity of bull trout habitat would occur despite removal of passage barriers and an increase of lake habitat for bull trout..." (SDEIS Fisheries Specialist Report p. 150).

"Fish species composition and/or relative populations within the creeks in the SGP area may change after reclamation, as anticipated habitat may favor steelhead over Chinook salmon, and there would be a decrease in habitat for bull trout and westslope cutthroat trout and Chinook salmon. Therefore, fishing opportunities may be altered after reclamation as well." (SDEIS, Section 4.12, p. 4-544).

Another unacceptable factor is that these are both short AND long term impacts. Stream temperatures predicted to be elevated for up to 100 years within the mine site? This will impact fisheries, wildlife, and recreation opportunities for generations.

This project could also have devastating impacts on our wildlife, particularly wolverine. Wolverines have had a consistent presence in the project area, and the area also provides a travel corridor to other habitat areas. Mining activities in this area as proposed would greatly reduce or fragment habitat for the wolverine, causing changes in behavior and posting significant risk to their continued existence in the area. Adding to my concern is the fact that the impacts of climate change were not taken into consideration in multiple parts of the SDEIS (like when predicting stream temperatures or other environmental impacts), meaning the true potential impacts to our fish and wildlife are unknown.

Along with concerns to the health of our fish and wildlife, I have concerns about impacts to public health. During mining operations, it is highly likely that arsenic will be released into the air - impacting anyone who recreates in the area. What is the Forest Service's plan to monitor the real time levels of arsenic in the air? Should arsenic levels exceed what is deemed to be safe, what is the Forest Service's plan to stop the bleeding and reduce the arsenic levels being released? There needs to be air quality monitoring next to the mine site and along the public access road, especially to Thunder Mountain where there are more people recreating.

The threat to public health also includes transportation concerns. Estimates say there will be over 3,000 trucks annually traveling state and US highways carrying potentially hazardous mine waste. These trucks may also travel popular backcountry roads, and would also be driving through Idaho communities. Accidents are bound to happen, and the released toxins can have devastating consequences. Yet, there is no risk analysis on local communities if a spill did happen. This must be addressed by the Forest Service - the public has the right to know.

Not only does the South Fork Salmon River, its tributaries, and the surrounding rivers and lands support an array of wildlife, it also provides solitude and ruggedness that so many Idahoans seek while recreating. The Stibnite Gold Project would have huge impacts on recreation in the area. In some areas, recreation opportunities would

be completely lost - 13,441 acres of National Forest Service lands would be rendered completely inaccessible due to mining operations. In other areas, recreation would be drastically changed - from potential security checkpoints and surveillance patrols in the Thunder Mountain area, to unrestricted public access for decades in the Operations Area Boundary. The recreational impact of the project goes beyond public access issues - the land would also look, sound, and feel completely different in parts, which concerns me. Operational noise would be audible up to 1.7 miles away, 24 hours a day, replacing the sounds of songbirds with trucks, and quiet solitude with rock blasting. The scenery would also change and look less natural due to mining activities, negatively impacting the experiences of those looking to enjoy the natural landscapes - especially considering over half of the 3,500 acres of disturbance would be in previously undisturbed areas. Even with reclamation efforts, the mine site will bear the scars of this project for generations to come. I'm also concerned about wildlife watching opportunities due to noise, traffic, and habitat loss. The character of the nearby Frank Church-River of No Return Wilderness will also be degraded with noise and light from the construction of a section of this access road and other mining activities, impacting the wildlife that live there and the people that visit to experience wilderness characteristics. Recognizing these impacts, I have concerns for this project affecting the ability of outfitters and guides to provide activities, degrading customer experiences and impacting the broader outdoor recreation industry - a huge economic sector for Idaho and this region in particular.

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan. The Forest Service had many alarming conclusions in its SDEIS, which must be remembered when considering permits for this concerning project. I believe that Idaho's clean air, clean water, public lands, and fish and wildlife are more precious than gold - which is why I urge the Forest Service to reject the Stibnite Gold Project proposal.

Thank you for your time and the opportunity to comment. Abby Urbanek