Data Submitted (UTC 11): 1/10/2023 11:07:23 PM
First name: Deirdre
Last name: Abrams
Organization:
Title:
Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the SDEIS for the Stibnite Gold Project (SGP). After reading the SDEIS, it is clear that approving this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and will harm 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. Stream temperatures are predicted to be elevated for up to 100 years within the mine site boundary and the habitat for these sensitive species will be for the worse, not better, as a result of this project.

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. Calling it a restoration project is simply a euphemism and marketing strategy by Perpetua.

The effects of climate change will inflame the impacts the SGP will have on the environment and these effects were inadequately addressed in 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.

I was delayed on the Johnson Creek road this last summer when an SGP mining rig was too large to make one of the tight turns, causing it to roll off the steep road. The road was closed for hours while they dealt with pulling this rig back up to the road. What would have happened to Johnson Creek had that heavy equipment rig been carrying diesel or other toxic loads? 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. Who will clean it up? How long will it take? Who will pay for it? Payette Lake is McCall's source of drinking water. How will that be addressed if there is a hazardous spill by an SGP vehicle traveling through McCall? The Hwy 55 corridor is a scenic byway from Boise to Valley County with the Payette River running alongside the highway. The SDEIS does not incorporate how hazardous spills from transportation will be addressed in this part of the scenic corridor watershed, either.

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 South Fork 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 the river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and the risk of a catastrophic toxic spill if this project moves forward. Wolverines in this area have already been pushed to their farthest limits, and this

project would exasperate this even more.

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, in addition to Hwy 55.

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, the Forest Service must protect the Salmon River watershed and reject the proposed Stibnite mine plan. This pristine watershed, home to endangered and threatened species, multi-use recreational opportunities, and treaty rights is no place for a mining operation of this scale and ominous risk.

Thank you,

Deirdre Abrams