

Data Submitted (UTC 11): 1/11/2023 12:30:45 AM

First name: Caelin

Last name: Bradshaw

Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

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, 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. 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.

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 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.

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.

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".

I am concerned that the SGP will negatively impact not only the health of the river and its ecosystem including the fragile wild salmon populations, the ability of countless to recreate in the area and set the State's salmon

restoration actions back.

We, in Idaho, are blessed with some of the most pristine and clean rivers in the nation and in the world. In particular, the Salmon river and all its tributaries are some of the last clean and for the most part, protected rivers in the country. This project threatens to jeopardize so much of what the Salmon river means to so many people by negatively impacting its water quality, fish populations, and people's access to the river. Not to mention the lack of conclusive data on consideration of first flush chemistry for development rock storage facilities (DRSF) contact water, and lack of consideration of mass-loading inputs from some Idahopollutant Discharge Elimination System (IDPES) permitted discharges to name a few.

The point is, the Salmon River is ours to use and protect, and starting a new mining operation without the proper research is, at best, a major oversight, with potentially catastrophic consequences for the entire Salmon River drainage.

For these reasons, I strongly urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.