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First name: Melissa

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Organization:

Title:

Comments: Dear Supervisor Linda Jackson,

My name is Melissa Coriell and I am writing to provide comments on the proposed Stibnite Gold Project.

I have lived in McCall for 14.5 years. My family and I spend a lot of time in the Salmon River watershed, particularly in the South Fork of the Salmon watershed. When I moved to McCall in 2008, my home became a gathering place for people all over the region wanting to go down the South Fork of the Salmon River. It continues to attract river lovers from all over the globe. Although it holds a special place in the heart of many river floaters, more importantly, the South Fork of the Salmon River watershed is within the aboriginal territory of the Nez Perce Tribe. SDEIS 3-506. In considering whether Perpetua Resources has the right to conduct mining activities at Stibnite, the Forest Service must ensure that any assumption-whether correct or incorrect-regarding Perpetua's mining rights does not cause it to shirk its solemn trust responsibility to protect the Nez perce Tribe's treaty-reserved resources, including the ability to access and harvest those resources. See *United States v. Winans*, 198 U.S. 371, 381-82, 384 (1905) (enjoining recalcitrant owners of a federal land patent from limiting physical access to Yakama fishermen's usual and accustomed fishing places as well as from operating fishwheels permitted by state authorities that interfered with the ability of salmon to travel upstream).

Additionally, whitebark pine is now listed as a threatened species under the Endangered Species Act. According to the SDEIS, "[t]he 2021 MMP would remove an estimated 259 acres of occupied whitebark pine habitat (12.5% of occupied habitat in the analysis area), totaling 1,236 trees (23 would be mature, cone-bearing)." (SDEIS, at ES-16). The Forest Service must ensure these counts are accurate and must ensure these counts include areas that may be affected by any avalanche control work necessary to maintain safe mine site ingress and egress. Control work may artificially trigger avalanches that take whitebark pine, which the SDEIS does not appear to consider at all.

The South Fork of the Salmon watershed is habitat for Chinook salmon, steelhead trout, and Bull Trout-all listed as threatened species under the Endangered Species Act. Approving a mine that degrades the habitat of these fish for the next century or more is not in the public interest and certainly cannot be justified by assuming Perpetua has rights under the United States mining laws. (SDEIS p. 4-386) (noting that impacts to fish will come from many different sources, including direct loss of habitat, increased stream temperatures, and hazardous spill risk).

Notably, decreased and suboptimal fish habitat will result from mining activities. And in fact, according to the SDEIS at ES-15, "predicted temperatures [would] return to existing conditions over a period of approximately 100 years." This does not appear to account for climate change. Indeed, nothing in the SDEIS even attempts to quantify the effects of climate change on predicted stream temperatures after mining activities cease. Moreover, it appears that if stream temperature mitigation plans fail-even just a little bit- "stream temperatures downstream of the

Yellow Pine pit area could also be greater than existing conditions." SDEIS 4-281. Bull trout, in particular, given their temperature sensitivity, would face even greater loss of habitat if this is indeed the case. The Forest Service must disclose what creates this uncertainty in the mitigation measure because without it there would appear to be destruction or adverse modification of a listed species' habitat that is far greater than what the SDEIS concludes.

How can the "need" for this project be justified? There is no need for a gold or antimony mine at this time. First, there is an abundance of gold in the United States, which is primarily used for hoarding-not any useful technologies. Second, even if antimony is not currently mined as a "primary" by-product of a gold mine, there are

known substitutes for its primary use, which is as a fire retardant in clothing and furniture. Antimony's use in weaponry is an insufficient justification for what is really a gold mine. Why the DoD dropped the bombshell press release in the middle of the SDEIS comment period is either nefarious timing press or just a really bad joke. Speaking of jokes-NEPA is not one of them. It requires the Forest Service to provide the necessary information to the public to ensure the public's participation in the decision making process. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989). The DoD and Perpetua claim the money awarded is "to complete environmental and engineering studies necessary to obtain a Final Environmental Impact Statement, a Final Record of Decision." Huh? If more environmental and engineering studies are necessary for the mining permit, why were they not included in the SDEIS and available for public comment? If such studies are "top-secret," at least that fact must be disclosed. In any event, if this really is an antimony mine, then the project footprint can be much smaller and the mining conducted underground.

I plan to return to the South Fork of the Salmon watershed in the near future and I have all intentions of doing so regularly until I die. I intend to take my children hiking down the South Fork and kayaking on the East Fork of the South Fork when they're old enough. In order to ensure that we can safely return to the South Fork year after year, I urge you to choose the NO ACTION ALTERNATIVE and to keep the highfalutin, big-city-money-bags corporate snake-tongued investors' out of the heart of Idaho.

Respectfully,

Melissa Coriell  
McCall, Idaho