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Organization:

Title:

Comments: I am writing to express my concerns regarding the EIS submitted by Perpetua regarding the stibnite mine in the the South Salmon River Basin. I am familiar with the region both as a whitewater kayaker that has spent considerable time in the region, and more recently as a doctoral student at the University of Oregon where I study ground and surface water systems throughout the Columbia River basin (including the Salmon River Basin). My primary concern comes from looking over the techniques implemented in their hydraulic models, which are grossly over simplistic and fail to give me any confidence in Perpetuas ability to understand, much less manage, the impacts of the project on these river systems. It is obvious these models were not executed with a high level of expertise or understanding of state-of-the-science methods. Even within the constraints of their model the known implications on summer base flow, and thus the temperature and chemistry of the river water will be clearly detrimental to the health of downstream waterways and the ecosystems that depend on them. In addition to any concerns from Perpetuas poor understanding of these systems it is striking that this is a region with a rapidly expanding tourism economy that depends heavily on these waterways, and which represents a viable source of jobs and economic stimulation with positive effects that will be much more long lasting than what is being proposed by Perpetua. While I could go on regarding other aspects of this notably lacking EIS I will leave it with these main points and formally request that you reject this proposal and protect the public lands that make Idaho so unique.

Thanks for your consideration