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First name: Jessica
Last name: Bonnesen
Organization:
Title:
Comments: Within the SGP footprint, critical habitat for ESA-listed chinook salmon, steelhead, and bull trout all exist. While Perpetua firmly stands behind the notion that this project represents a general restoration effort, the science and analysis included within the SDEIS provide numerous contrasting facts and reasons to be extremely concerned about the overall health of the fisheries found at Stibnite and potential downstream implications.
First, a primary component of the SGP related to fisheries restoration is the experimental fish tunnel that will be used to provide access to the upper East Fork South Fork (EFSF) during early mine operations. In 2019, The U.S. Fish and Wildlife stated that due to the uniqueness of this tunnel design, "there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively."1 Even if this barrier is sufficiently resolved, this project will create a new barrier in Meadow Creek at the foot of the Tailings Storage buttress and dam.
The project will largely result in degraded conditions that are paramount to the survival and reproduction of the resident and migratory fish species found in the area. In particular, stream temperatures are predicted to be elevated above existing baseline conditions for up to 100 years when vegetation can reestablish adequate shade (SDIES ES-15). This timeline is far too long and may result in the permanent extirpation of temperature sensitive species from the project area. Additionally, these baseline conditions represent the current state of affairs at Stibnite after a century of mining and degradation. True restoration would go far beyond the current baselines and attempt to reach what would be pre-mine conditions.
For chinook salmon in particular, this project will result in the temporary or permanent displacement of the species from the project area (SDEIS ES-19) due to habitat conditions reaching unsuitable conditions.
1 United States Fish and Wildlife Service - Comments on Proposed Stibnite Gold Project 2019
2

For bull trout and westslope cutthroat trout, the outcome is much the same. The SDEIS asserts that at the end of the project there would be a "net decrease in both quantity and quality of habitat for bull trout and westslope cutthroat trout," (SDEIS ES-19).