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Title:

Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project - I have many concerns that lead me to urge the Forest Service not to approve this project as proposed.

As an Idahoan that loves our state's public lands and wildlife, the Stibnite Gold Project poses too many threats to the area's water, air, lands, wildlife, and recreation opportunities.

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. Whether it's a complete loss of public access or severe quality loss, recreation, in any form, within the general area of the mine will be negatively impacted. The analysis of impacts on recreation is also 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.

I also have concerns for damage to critical habitat for Chinook salmon, steelhead, and bull trout, as noted in the SDEIS: "Post-closure, a net decrease in quality and quantity of bull trout habitat would occur despite removal of passage barriers and an increase of lake habitat for bull trout..." (SDEIS Fisheries Specialist Report p. 150). I also am concerned for the wildlife of the area. This project would lead to habitat fragmentation for wildlife with clearing and construction of new roads through currently pristine roadless areas. Not only would this impact wildlife, but the experiences of wildlife watchers who frequent the area. Mining activities will significantly disrupt, disturb, and harass wildlife. Some species that are sensitive to human presence could potentially not return for years after closure.

Not even considered in impacts to fish, wildlife, and water quality is the looming threat of a spill of toxic materials. The SDEIS states that over 8.5 million gallons of petroleum products, 7,300 tons of ammonium nitrate (used for blasting), 100 tons of explosives, and 4,000 tons of sodium cyanide will move annually over the mine's identified transportation routes (Table 4.7-1, p. 4-122-124). The SDEIS fails to quantity spill estimates. This information must be looked into - not only do our communities have the right to know the risk their communities face with the probability of spills, but it is also a huge factor in recognizing that this proposal must be stopped. It also shows that the full impacts related to this mine remain unknown.

Along with potential spills affecting public health, elevated levels of arsenic and particulate matter pollution in the air from dust also pose a threat to public health. According to the SDEIS Air Quality Specialist Report (p. 68), almost 800 pounds of arsenic would be released into the air during the project's most polluting year. The public also needs to know more about how the Forest Service plans on monitoring this, what levels are deemed healthy, and what the plan of action is in case levels are too high.

This project should not move forward as proposed, and I urge the Forest Service to deny any permits. Thank you for the opportunity to comment.

Ryan Smith