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Comments:

I urge that the Forest Service reject the Supplemental Draft Environmental Impact Statement for the Stibnite Gold project. The threats to endangered Chinook salmon and other important fish species and their habitat, as well as water quality and drinking water, air quality, and Treaty Rights are inadequately addressed, and must require a more thorough and comprehensive review, as mandated by NEPA.

Some proponents argue that these mineral resources are needed to promote a clean energy economy. But why do we need a clean energy economy? Most urgently, to stem the climate crisis, and thereby avoid its worst impacts.

But what is achieved if we inflict the same kind of harms and injustices in the process, and on those already most at risk from climate impacts themselves, in low-income, disadvantaged, and Tribal communities?

We cannot accept such a tradeoff. Sacrifice zones and frontline communities must not be the cost of averting climate catastrophe for those who are already better equipped to contend with it. Passing off the harms of addressing everyone's problems can no longer fall on people, communities, ecosystems, and species who are prevented from protecting themselves.

Resource recovery and recycling, and other technological innovation, will address these problems much more quickly and effectively anyway, regardless of this project. Claims about the greater good are as much beyond the scope of this analysis as demand forecasts, market projections, or profit modeling.

Even with mitigation measures, the SDEIS predicts the project could result in the irretrievable direct loss or injury of Chinook salmon and steelhead. This is incompatible with the federal Endangered Species protection for Chinook salmon, and further mitigation measures for fish species and habitat impacts must be analyzed and reviewed before the project is allowed to proceed any further.

The SDEIS analysis of drinking water impacts on the South Fork Salmon River is also inadequate, and the consequences it would have for local communities must be comprehensively addressed. Air quality, water quality, and the management of waste rock and hazardous materials also require more comprehensive review to comply with NEPA requirements. We must have a clear and complete understanding of what risks the project presents before any decision can be made that commits us to these outcomes.

Finally, the impacts on Treaty Rights must be of primary concern, and the consent, not just consultation, of the Nez Perce Tribe is necessary. The Constitution guarantees the supremacy of Treaties, and that includes the Treaty of 1855 and subsequent treaties with Nez Perce in which the Tribe retained the inherent right to fish, hunt, gather, and graze livestock on open and unclaimed lands, all outside of the reservation boundary.

These off-reservation rights have been upheld on numerous occasions in state court cases, citing Treaty Rights as the supreme law of the land. The SDEIS fails to respect these rights and protections for Nez Perce sovereignty and cultural survival. This project cannot advance in violation of federal treaty obligations.

In high school civics I was taught that government exists to protect its citizens from internal and external threats, and guarantee their rights. Perpetua Resources cannot be granted approval unless our rights to clean drinking water, clean air, healthy ecosystems, and Treaty Rights will be protected from the threats of this project.

The SDEIS must be rejected.

Thank you for your attentive and genuine consideration of public comments.