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Organization:

Title:

Comments: I object to the Stibnite Gold Project EIS #50516. The Responsible Officials are Matthew Davis, Payette National Forest Supervisor and Brant Peterson, Boise National Forest Supervisor and the Objection Reviewing Officer is Kelly Orr, Deputy Regional Forester. The project is located in Valley County, Cascade Ranger District.

There are significant issues of immediate concern: increased risk of heavy metal contamination, stream temperature increases, and general loss of critical ecosystem function and habitat. Against the backdrop of ongoing salmon recovery efforts, recreational values and access, and the broad negative impact to the environment, this project represents an unacceptable risk to our public lands.

The area within and surrounding the proposed mine is part of the Indigenous homelands of the Nez Perce Tribe who have reserved the right to fish, hunt, gather, and pasture at traditional places in their 1855 Treaty with the United States. This project disrespects and pollutes the homeland of a nation we have already stolen so much from. The project would also require Tribal and recreational access restrictions in the 3,266 acres footprint and 14,000 acres of public land within the Operations Area Boundary for a minimum of 20 years. This is unacceptable.

The project poses both short- and long-term threats to Tribal interests, water quality, salmon and bull trout; wolverines and other wildlife, and human health. There is particular concern about increased water temperatures in watersheds that are home to Endangered Species Act-protected salmon, steelhead, and bull trout. The Hangar Flats Pit would be dug in Meadow Creek valley, an area already been reclaimed and restored by the Forest Service and EPA. Meadow Creek is currently a productive habitat for two Endangered Species Act listed species: spawning chinook and resident bull trout. We know that streamflows in the EFSF watershed will be reduced by up to 30%, and the removal of riparian shading will increase predicted stream temperatures by up to 6.6° C for up to 100 years. None of which accounts for the additional impacts of climate change. The South Fork Salmon Watershed, directly affected by the construction of this mine, contains the most important remaining habitat for summer chinook salmon in the Columbia River basin. This is not something I agree to sacrifice.

The project requires constructing an industrial ore-processing facility, burying pristine bull trout habitat beneath 100 million tons of toxic mine tailings, building miles of new access roads and electrical transmission lines through inventoried roadless areas, and providing on-site housing and services for hundreds of workers. Perpetua has proposed accessing the site via a combination of new and modified road sections of the existing Bunt Log Road, Meadow Creek Lookout Road, and Thunder Mountain Road. This route would entail the construction of approximately 15 miles of new road and bring mine traffic along the border of the Frank Church Wilderness. The area in which this mine would be located is set in a pristine wilderness area, one of the very few we have left in the lower 48. I cannot agree to destroying wilderness and wildlife for the sake of mining.

Another issue with the construction of this mine that I object to is that, by the State of Idaho's calculations, operations at the proposed mine will also emit millions of pounds of arsenic-laden dust per year posing additional environmental and human health risks for anyone recreating near, or traveling through the mine site. All ore will be processed on-site using cyanide leaching processes. Perpetua plans to reprocess legacy tailings and waste rock. During operations there will be major alterations to stream channels, destruction of wetlands, and ground water will be significantly reduced in order to mine at the depths proposed. There is deep concern about mercury and arsenic pollution from proposed mining operations, and the risks to public and ecological health. This is not just a problem for our land, rivers, and their inhabitants, but also for the people that actually recreate in one of our most treasured wilderness areas. I object to this proposed mistreatment of public land and to the risk it poses to

US citizens.

The potential for a major leak or contamination event would lead to river water quality compromises locally, but also regionally. Stibnite is located near the headwaters of the South Fork of the Salmon River. Therefore, if there were to be a cataclysmic contamination event, the repercussions would extend to Riggins, Lewiston and beyond. The downstream communities are dependent upon the Salmon River for their economies, and any actions that could compromise livelihoods should be considered dangerous. I do not agree to allow this risk to our watershed, natural environment, or community.

Promises of safe mining and excavation practices are unfounded. Perpetua is presently involved in three legal challenges to its air quality permit, water rights application, and 401 water quality certification. All three of these challenges are contesting and highlighting the callousness and indifference with which Perpetua plans to treat the river, the fish, human health, and the land, all under the banner of profits. All of the concerns raised in these challenges are unresolved in the FEIS. I do not agree to allow the leaders of this project to come in and destroy our public land with such a horrific track record.

For these reasons, I object to the continuation of the Stibnite Gold Project EIS #50516.