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March 8, 2022

Ms. Jennifer Blake
McCall District Ranger
Payette National Forest
102 West Lake St.
McCall, ID 83638
(208) 634-0400

RE: Idaho Conservation League's Comments on the Proposed St. Helens Mine Environmental Assessment

Dear Jenni:

Please accept the Idaho Conservation League's comments on the Environmental Assessment (EA) for the proposed St. Helens Mine, located in the McCall District of the Payette National Forest off Goose Lake Road. Since 1973, the Idaho Conservation League has worked to protect Idaho's water, wilderness, and quality of life through citizen action, public education, and professional advocacy. The Idaho Conservation League (ICL) has a long history of involvement with mining and water quality issues. As Idaho's largest statewide conservation organization, ICL represents over 35,000 supporters who have a deep personal interest in ensuring that mining operations and reclamation activities remain protective of our land, water, fish, and wildlife.

We appreciate the Payette National Forest using data from the recently analyzed Little Red Goose project to analyze the potential impacts and effects of the proposed St. Helens Mine to the project area, including downstream waterways and fisheries. A review of the St. Helens EA reveals that the Forest Service addressed the concerns and suggestions ICL and others provided during the project's scoping period. Most significantly, the project will have minimal visual impacts, and wildlife mitigation measures, including restricting human work activity for longer than 6 hour blocks before August 15 and seasonal restrictions, will limit potential wildlife impacts, and project design features and mitigation measures will limit and/or mitigate the potential negative impacts to nearby waterways and fisheries. We also appreciate the Forest Service identifying and marking cultural resources within the project area and committing to resource avoidance as the primary mitigation measure. Finally, ICL supports the use of the Best Management Practices (BMPs) for dust control, invasive species management, safety, and health as outlined in the EA.

Although the project proponent, Wildcat Diversified Investment, LLC proposes to work the mine site for a limited period each year (35-45 days per year), due to the mine's potential lifespan of 10 years, ICL recognizes that on-site circumstances may change. Should significant alterations or conditions occur during the project's lifetime, either identified through monitoring efforts (as outlined in the EA) or as a result of a weather or other uncontrollable event, we encourage the Forest Service to re-engage with the project proponent to identify potential solutions and conduct further research and analysis that leads to solutions that have a minimal negative impact on the surrounding environment.

Thank you for the opportunity to submit comments on this project. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact us. We look forward to working with the McCall Ranger District on this and future projects.

Respectfully submitted,



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