January 9, 2023

Ms. Linda Jackson

Forest Supervisor,

Payette National Forest

500 N. Mission Street

McCall, ID 83638

linda.jackson@usda.gov

Re: Submission of Evaluation of the Socio-Economic Impacts of The Proposed Stibnite Mine as comments to the US Forest Service regarding the SDEIS.

Dear Ms. Jackson:

A lifelong resident of McCall, growing up with the woods, the rivers, the streams, the lake, the wildlife and wildflowers, I find the idea of this mine in the headwaters of the Salmon River to be very threatening to our rural small-town way of life and our health and well-being.

We have been business owners since 1980 in McCall, and my husband and I now have three young grandchildren who are growing up here. The proposed gold mine is not going to bring prosperity to the area. It is well known, that mining leaves scares on the Earth, that in many cases, are irreparable, with many examples of tailings fields leaking and pollutants from the mine contaminating water and land. Minerals are needed for industry but this is a gold mine and therefore, it begs the question, is it a necessary mine, especially with regard to the risk it poses?

As a younger person, I used to take the beauty and splendor of my home for granted, but I no longer do. In fact, I am terrified by what this mine will do to our small-town way of life and our future economy in Valley County. Our economy, since the 70’s has transformed and business and commerce rely more heavily on visitor and recreation industries and less on industries of extraction like mining and logging.

I reference the independent socio-economic study, paid for by a broad swath of businesses and citizens, entitled, **An Evaluation of the Potential Socio-Economic Impacts of The Proposed Stibnite Mine  
on Valley County, Idaho, (DEC,2022).** From section 1 of the Executive Summary of that document, we learn that the existing Valley County economy can be described this way:

“In the last half century Valley County has tripled in population while jobs have nearly quadrupled. **The Valley County economy outperformed the national economy across a broad range of indicators of local economic vitality: population, employment, and real personal income**. In the last ten years or so, the combination of natural growth and net in-migration added about 2,500 new residents in Valley County, but 87 percent of that growth was due to net in-migration, i.e., people “voting with their feet”. Many of the people that moved into Valley County, brought with them a significant amount of “non-labor” income. **In 2020 the non-labor sources of personal income in Valley County totaled $355 million. In comparison, the labor Earnings came to $261 million. That is, the non-labor personal income was 36 percent larger than the total labor earnings.**

The historically important goods production in Valley County, timber and mining, have declined in the last several decades as a source of jobs. That is not a unique trend found only in Valley County. Rather, it is a state and national economic change. Jobs in goods production (Non-Services-Related), a category that includes timber and mining, were largely stagnant over the thirty-year period 1970 to 2000 relative to the growth in jobs in services sectors. During that 30-year period, jobs in Services Related industries rose steadily, almost quadrupling (3.9-fold) over that 30-year period.”

In section III of the Executive Summary, one can read about the **amenity values and community perception:** “People have chosen to move to Valley County because of its natural beauty and the outdoor recreational opportunities that surround them. Additionally, people have been moving in at rates higher than the national, state, or rural county average, and they have brought “non-labor” income with them. In the economic literature these attractive local characteristics are called “amenities” and treated as economic values that improve the well-being of residents -just as the purchase of a home in an attractive neighborhood would. Recognition of the existence of these environmental values at certain locations also warns us **that if we are not careful about how we manage special attractive natural landscapes, we may degrade significant existing amenities of considerable value, potentially creating a “dis-amenity” that leaves many people worse off.”**

Here's the rub: “In one important sense, the proposed Stibnite Gold Project represents **a gamble that puts at risk a known and existing outdoor economy that is supporting economic vitality in Valley County.** What is being offered in its stead is **a speculative but threatening multiple open pit mining venture that,** if it is commercially successful, will bring only a relatively small and short run “bump” in additional economic activity in Valley County. When a mine or other types of industrial facilities are proposed near where people live, **the people that live in the area, as well as the people that know about the new facility and the area, may change the way that they think about that area. That is, a “stigma”, or negative perception, about an area caused by the negative characteristics** associated with the industrial facility such as degraded air and water quality, noise, congestion, general run-down characteristics of the neighborhoods, falling property values, etc.”

In section IV, entitled Socio-economic Volatility in Mining Communities the Power report says this: “As Perpetua has correctly shown, people who reside in Valley County *and* have mining jobs will have significantly higher than average pay when compared to other Valley County residents. That is known**. What is unknown is what some of the costs associated with having the Stibnite mine in Valley County will be. The economic and social science literature tells us that there will be costs in the form of retarded economic growth, increased pressure on public services that Valley County provides, reduced educational attainment, and increased negative social interactions as a transient workforce tries to integrate into the local community.** What this report also will show is that Valley County’s **economy is currently thriving** and the reason that the economy is so robust, in large part, is because of the natural amenities that Valley County has. **The possibility of short-term gain associated with the proposed mine should be carefully weighed against the potential for long term harm to an otherwise thriving economy.”**

Finally, the world my grandchildren and their friends will be inheriting will be dominated by the effects of climate change - the largest threat our Earth and all of its inhabitants is currently facing. Why is there no mention of mitigation strategies for climate change in the DEIS and the SDEIS? The proposal is flawed because it is not addressing this reality. The effects of the mine on will exacerbate the effects of climate change as we experience lower stream flows, higher temperatures, the threat of fire, increased emissions of CO2 into the air as well as other pollutants. There will be increased stress placed on all species of wild animals and plants who will be displaced by this mine’s footprint.

I would like to propose that the USFS choose the “no action alternative” for the Stibnite Gold Project.

Debbie Fereday