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First name: Anette

Last name: Spickard

Organization: City of McCall Idaho

Title: City Manager

Comments: The City of McCall submits the following comments for your consideration in preparation of the Final Environmental Impact Statement and Record of Decision for the Stibnite Gold Project.

After review of the DEIS, it appears that the City of McCall is mostly excluded from the analyses. General references to McCall are made in many narrative sections but no impacts were specifically analyzed for our community. We believe this is in error based on section 2.3.5.19 Operations Traffic which states that:

The estimated annual average traffic during mining and ore processing operations is provided in Table 2.3-7. Supplies and deliveries for the mine site during operations would access the SGLF using State Highway 55 to Warm Lake Road. Approximately two-thirds of all mine-related traffic would originate south of Warm Lake Road and would use State Highway 55 through Cascade and other communities along State Highway 55 south of Cascade including Banks and Horseshoe Bend. Approximately one-third of all mine-related traffic originating north of Warm Lake Road would use State Highway 55 through the communities of Donnelly, Lake Fork, and McCall. Through McCall, mine-related traffic would generally use Deinhard Lane and Boydston Street.

Alternative 2, which is the preferred alternative of the applicant, proposes additional transportation impacts due to the Centralized Water Treatment Plant and includes a statement that: During mine operation, the Centralized WTP is expected to require the following chemicals and reagents on an annual basis. Sodium Hypochlorite - 15,000 gallons Ferric Sulfate - 125,000 gallons/year Hydrated Lime - 250 tons Organic Flocculant (polymer) - 1,900 gallons Sulfuric Acid - 2,400 gallons Sodium Bisulfite - 2,000 gallons Organic sulfide precipitant, if needed Transport of these chemicals and reagents would add approximately 40 round trips for delivery to the operational AADT presented in Table 2.4-3. An estimated 2 to 4 employees would be required to operate the Centralized WTP.

In all alternatives, except the No Action Alternative, the estimate of one-third of all mine related traffic traveling through McCall remains the same. The DEIS further identifies the types of hazardous materials and explosives that will be transported on and off-site but does not identify which materials will come through McCall or at what volume. We therefore assume that one-third of all materials will come through McCall posing safety and transportation impacts on our community which should be addressed in your Final EIS. Mitigation measures to address these impacts should be included in the Record of Decision.

Deinhard/Boydston impacts and proposed mitigation measures

The Deinhard/Boydston route through McCall as identified in section 2.3.5.19 Operations Traffic is a local city street and passes through a residential area along Boydston and then through residential/commercial/industrial property along Deinhard. The City agrees that if mine traffic will come through McCall then Deinhard/Boydston should be the required route through McCall. The alternative route would be for the mine traffic to remain on State Highway 55 (West Lake Street/ 3rd Street) which travels along Big Payette Lake and through our downtown. This route contains dense residential and commercial neighborhoods, a narrow Right of Way with bike lanes, a 90 degree turn in the heart of downtown, numerous pedestrian crossings, and hundreds of driveway accesses, all of which creates a high number of potential conflicts and traffic delays. Additionally, Big Payette Lake is the sole source of drinking water for the City of McCall and we cannot afford a hazardous material spill into the lake.

While the Deinhard/Boydston route is specifically identified in the DEIS, the DEIS did not analyze the socio[shy] economic, public health and environmental impacts of this route. The route contains a shared bike/pedestrian pathway system with multiple modes of users on the roadway. It travels through a populated residential area. There is an "s" turn that is dangerous in the winter with multiple slide-off's and accidents due to winter weather conditions. The Highway 55 intersections of this roadway, on the south at Deinhard and on the north at Boydston,

were identified in the applicant's Traffic Impact Study submitted to Idaho Transportation Department and Valley County as recently as September 2020 as needing safety improvements to accommodate the turning geometry of their large vehicles.

The DEIS is silent on the safety improvements required for the large vehicle mine traffic on this roadway and only addresses mine traffic impacts on State Hwy 55 much farther south of McCall. Even the applicant acknowledges that the McCall route is of critical interest to their operation as they are engaged in discussions with the Idaho Transportation Department (ITD) and the City for a cooperative agreement between the three parties to ensure intersection improvements are made in order to accommodate this traffic if the mine is permitted. However, the City does not hold any regulatory permitting authority in this matter and is relying on the good faith of the applicant to enter into an agreement to make these improvements. To ensure the safe movement of mine traffic through our community the City respectfully requests that the Forest Service include a mitigation measure in the Record of Decision that the applicant provide intersection improvements identified by ITD and the City of McCall on the Deinhard/Boydston route. Further, the City requests that no mine traffic with hazardous materials and explosives be allowed to travel through McCall until the mitigation measures for these intersections are constructed.

The DEIS did not analyze the environmental impact of using the Deinhard/Boydston route. The route crosses the North Fork of the Payette River which is identified by Idaho DEQ as a section 303(d) impaired waterway under the Clean Water Act with multiple TMDL's in effect. Significant investments have been made by the City, the Idaho Fish and Game Department, the Idaho Department of Environment Quality, the Valley County Soil and Water Conservation District, the National Park System, private non-profit groups and individuals to restore its health as an important part of the overall watershed in this area for fish habitat, recreation and downstream water quality of Lake Cascade. The water quality regulations imposed on the North Fork Payette by Idaho DEQ are so strict that even our community's treated wastewater isn't allowed to be discharged into it; 100% of our treated wastewater is land-applied on neighboring farmland. This is in stark contrast to the alternatives in the DEIS to allow treated water discharges into the EFSFSR.

The City is highly concerned about any hazardous material spills into the North Fork Payette River. The McCall area fire departments do not have a HazMat Team nor proper materials to respond to, contain or clean up a spill. According to the McCall Fire District Chief the closest HazMat Team is a minimum of four hours away and McCall Fire is only equipped to issue evacuation notices and clear the scene while waiting for a HazMat Team to arrive. Four hours is a substantial amount of time for hazardous materials to spread into the North Fork of the Payette River and into the air over a populated area. Since mine traffic is forecasted to occur 5 days/week for many years across this river crossing, the risk of exposure to an accident is high especially during winter conditions. This is an important impact that should be included in the Final EIS.

The applicant has demonstrated a willingness to address this type of issue by providing numerous spill kits along roadways such as Johnson Creek Rd to prevent/quickly respond to accidents along the routes into the Stibnite area and along rivers. The City respectfully requests that the Forest Service include a mitigation measure in the Record of Decision that the same consideration be given to our community and our protected waterways. The Forest Service should require the applicant to provide HazMat response resources in McCall or another nearby location to allow for a timely response. I have attached an email from the McCall Fire Department with recommendations for a HazMat resource and how it could benefit the larger Valley County community.

#### Recreation economy impacts

McCall's local economy is dependent on two primary sectors, the tourism/recreation industry and the service industry (financial, construction, medical, real estate, government). The City is a launching point to the backcountry via Lick Creek Road, Warren Wagon Road, and multiple charter air services from our local airport. The alternatives analyses identify the recreation resources of the Stibnite Mine study areas and recognizes that

access to the Idaho backcountry is of important value to this area's culture and economy. The City respectfully requests that the alternative selected for the Final EIS retains the most public access to the backcountry as possible and preserves as much of the natural resources in the area as possible.

While the DEIS does not identify Lick Creek Road as a primary access for mine traffic, it is being used now for mine access by Stibnite Gold employees. For mine traffic to utilize Lick Creek Road, it must travel off of State Hwy 55 through densely populated residential areas past two public schools along roads not designed for this type/volume of traffic. The consequences of an accident or spill in this area are high. The City respectfully requests that the alternative selected for the Final EIS specifically does not allow for mine traffic on Lick Creek Road. Use of Lick Creek Road should be reserved only for the general public's use so as to prevent conflicts with mine traffic and provide the public an alternative to Warm Lake Road for backcountry access.

Summary of impacts City requests be included in the Final EIS

The City respectfully requests the Forest Service identify and analyze impacts to the North Fork Payette River, a 303(d) impaired waterway, from hazardous materials and explosives transported to and from the mine using the Deinhard/Boydston route, including but not limited to, the lack of timely hazardous materials response which will negatively impact human health and the health of other species in the event of an accident.

The City respectfully requests that the alternative selected for the Final EIS retain the most access to the backcountry by the public as possible. The alternative should specifically disallow mine traffic on Lick Creek Road. Use of Lick Creek Road should be reserved for only the general public's use so as to prevent conflicts with mine traffic and provide the public an alternative to Warm Lake Road for backcountry access.

Summary of mitigation measures City requests in the Record of Decision

The City respectfully requests that applicant provide Highway 55 intersection safety improvements identified through a cooperative agreement made with ITD and the City of McCall on the Deinhard/Boydston route. Further, the City requests that no mine traffic with hazardous materials and explosives be allowed to travel through McCall until the safety improvements for these intersections are constructed.

The City respectfully requests that applicant provide HazMat response team resources in McCall or another nearby location to ensure timely containment and response to hazardous materials spills as recommended by the McCall Fire District.

ATTACHMENT: Email sent during the comment period to parties outside the Forest Service, Subject: HAZMAT Team in McCall or Valley County?