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Comments: Public Comment by Bruce Deal, Atherton, CA October 18, 2020

My name is Bruce Deal. My family has owned a cabin at Warm Lake Idaho for approximately 75 years. It is currently listed under Edson Fred Deal and Ann Albertson Deal. The cabin has been part of our family's history, and indeed Idaho's history, for many years. It was first purchased by my grandfather and grandmother, Edson and Gwendolyn Deal. My grandfather was a long-time Idaho politician, and served as State Senator, Lieutenant Governor, and Secretary of State of Idaho.

I understand that a large mine, The Stibnite Gold Project, is planned for the area several miles from Warm Lake. While the mine itself will not have a direct effect on Warm Lake, the mine will require substantial additional heavy traffic and noise on the single highway in and out of the region. Warm Lake Road is a steep and windy road for much of its length, Having many heavy trucks on this road every day will be a significant problem, has not been adequately studied, and no plan has been developed to adequately mitigate the concerns.

There are two problems in particular:

Noise and Traffic Measurements and Mitigation Plan

As I have reviewed the Draft EIS, I do not see adequate analysis of the noise impact. I am a professional economist and statistician, and I am a senior partner at Analysis Group, the largest private economic consulting group in the U.S. Much of my professional life involves analyzing data and presenting my findings in courts and regulatory bodies.

To properly analyze a project such as this, actual measurements must be taken under real-world conditions. In simple terms, actual trucks of the type to be used, fully loaded as they will be in practice, must be driven on the road using techniques that will be used (i.e. compression brakes). Measurements should include the noise level as measured from various locations, including the cabins, campgrounds, and public beaches. In addition, actual speed measurements must be taken to determine the impact on road congestion.

Unless actual data are used under real-world conditions, there is no way to understand the impact and develop an adequate plan. In addition, this is not a difficult process. While it would involve a modest amount of expense, there is simply no substitute for actual data under real-world conditions to make decisions. Conjecture is no substitute for actual data, and the work as done in the current EIS would be thrown out of court as simply inadequate.

Historic District

The Draft EIS is incomplete until a Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. 470) review is completed. In 2002 the Boise National Forest (NF) conducted a historic buildings and structures inventory at Warm Lake. In 2004, the Boise NF prepared a historic context statement for evaluating the NRHP eligibility of recreation residences at Warm Lake. The Boise NF consulted with the Idaho State Historic Preservation Office. The Warm Lake Recreation Residence Historic District, consisting of four residence tracts and fifty-five contributing residence lots, was found to be eligible for listing on the NRHP.

As I understand it, Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. 470) requires federal agencies including the U.S. Forest Service to consider the effects on historic properties of projects they

carry out, assist, fund, permit, license, or approve throughout the country. If a federal or federally-assisted project has the potential to affect historic properties, a Section 106 review must take place.

While the mine will not be destroying any structures in the historic district, it will certainly impact the Code of Federal Regulations at 36 CFR Part 800, "Protection of Historic Properties". Adverse effects include, but are not limited to, the introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features and adversely affect the historic property setting, feeling or association.

The noise and congestion created by the Stibnite Gold Project will have a significant and negative impact on the Warm Lake Historic District. As an example, currently the lake does not allow boats to travel more than 5 miles per hour until 11am. This leads to quiet, peaceful mornings around the lake where you can hear the call of the ducks and appreciate the beauty of the area. Having many large trucks using compression brakes throughout the day is hardly consistent with the historic charm of the area. No adequate analysis or review of this using real data and real-world-condition has been included in the EIS.

The Boise National Forest must comply with and conduct a Section 106 review and include the public in the process. This must be completed before any Draft EIS is considered. In addition, the Idaho State Historic Preservation Office, under Section 101(b) of NHPA, must comply with the State Historic Preservation Program to reflect the interests of the State and its citizens in the preservation of their cultural heritage. As such the Idaho SHPO must complete a full review of the impact of the proposed Stibnite Gold Project and involve the public in the process.

Conclusion

I appreciate you taking the time to review this project. After gathering the data and developing an adequate plan, it may well be possible to balance the development opportunity and preserve the historic and peaceful nature of this area. This may include a plan to require the trucks to travel in convoys only a couple of times per day or some other plan. But without data and without a thorough historical review, this project will result in unnecessary disruption.