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First name: Lida

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Organization:

Title:

Comments: To Whom It May Concern:

Thank you for the opportunity to comment on the DEIS of proposed Stibnite Gold Project #50516. I have lived, worked and cared for my family in Valley County, ID, for the last 20 years. My local small business focuses on outdoor recreation. I am concerned about the Stibnite Gold Project's impact on our area, our economy and, most importantly, I am very troubled with future consequences of the proposed project. Though I have concerns about many topics of the DEIS, I urge you to take a closer look at the following issues in particular:

*Fish

The Stibnite Gold Project would significantly modify critical habitat for Endangered Species Act (ESA) listed species. According to the USFS website "Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat." Alternative 2 of the DEIS would destroy 20.8% of chinook salmon critical habitat and 27.5% of bull trout critical habitat in the analysis area. These are unacceptable losses for these already endangered fish. All of the action alternatives of DEIS would adversely modify the critical habitat of chinook salmon, steelhead, and bull trout. Do not recommend any of the alternatives that destroy or modify fish habitat.

*Recreation impact

The area of impact is special to citizens of Idaho and beyond. In addition to other outdoor enthusiast, cyclists arrive to experience remote routes, pristine rivers and hot springs. The Idaho Hot Springs Route (Adventure Cycling Association, attachment A, <https://www.adventurecycling.org/routes-and-maps/adventure-cycling-route-network/idaho-hot-springs-mountain-bike-route/>) that leads directly through the area of impact is increasingly attracting cyclists from all around the country. In addition, the West Central Mountains Economic Development Council and the Cascade Chamber of Commerce recently developed Cascade Adventure Cycling Routes using the city of Cascade as a hub (attachment B; <https://wcmedc.org/recreation/>). Adventure Cycling Routes are being considered by several local outfitters. My own local business is tied to the recreation and cycling in the area as well. The proposed Stibnite Gold Project would adversely affect recreation and the opportunity for these routes to benefit local economy.

It is noted in the EIS that "the local communities rely heavily on tourism to support their economies" and that "the analysis area is a popular area for a variety of recreation activities on both private and public lands". While this is true, the EIS EIS data used to evaluate recreation impact (pg. 603, 615) are old (years 2003, 2010) and need to

be updated. There is no detailed report, management plan, or analysis on how the Stibnite Gold Project will affect tourism, recreation, or the tourist economy as related to the projects' alternatives. I urge you to provide such economic analysis using methods, sources, and data relevant to the most recent 2-3 years is needed.

I invite you to consider facts and sources listed below:

- Idaho's outdoor recreation economy generates \$7.8 billion in consumer spending and supports 78,000 jobs (Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020).

- Areas in the West with protected wilderness, national parks and recreational assets have higher growth rate and higher per-capita income

(Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020).

- Valley County Comprehensive Plan includes a "Recreation and Open Space" goal "To promote and support a viable recreation and tourism program ..." (Valley County Comprehensive Plan, 2018).

- The USFS is required to provide recreational opportunities (National Forest Management Act and ROS); the USFS is to manage the lands " for sustainable multiple uses to meet the diverse needs of people, ensure the health of our natural resources and provide recreational opportunities " (www.fs.usda.gov/managing-lands).

- Idaho's population values recreation (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019).

I am confident that outdoor recreation economy provides more viable, sustainable and ecological opportunity than Stibnite Gold Project. Please evaluate and explore this option more.

*Hazardous materials and transportation

I am highly concerned about contamination from mining activities such as 446 million tons of potential acid generating and/or metal leaching materials, 161,095 sq. meters of open pit walls or mine access roads crossing 71 different streams, exposing each stream to the risk of hazardous material spills and increased sedimentation. How are these risks being secured in a short term, long term, and after the lifespan of the project?

The Stibnite Gold Project will require year-round shipments of hazardous or toxic chemicals, explosives and fuel. All available transportation routes are along the Payette, Weiser, Salmon or Little Salmon Rivers. All shipments will travel through residential and commercial areas of McCall or Cascade, then along 75 miles of backcountry roads to the mine site. The EIS does not analyze accident and spill risk or clean up along US95 , ID55 or in the towns of McCall or Cascade.

Analysis and management plan for those risks and clean ups is needed.

*Post closure and perpetual care

I am perplexed about the DEIS alternative 2 references to "perpetual water treatment"?. If a treatment that continues indefinitely is used, than power lines, substations, and roads to the mine need to remain in perpetuity. Employees will be needed to tend the treatment plant constantly and 40 additional truckloads of chemicals for the plant will be needed annually. To ensure perpetual treatment - continuous and indefinite in timing - is an endeavor that is not viable. As such, Alternative 2 is not viable.

In conclusion, I am not convinced that the current DEIS fully evaluates the Stibnite Gold Projects' impact on the habitat for ESA listed fish, the affects on recreation opportunities, or the risks of hazardous spills and adequate water treatment.

Thank you,

Lida Clouser

McCall, Idaho

ATTACHMENT: Screen Capture from cascadechamber.com

ATTACHMENT: Screen Capture Main Route - Idaho Hot Springs Mountain Bike Route