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Organization:

Title:

Comments: To whom it may concern:

My name is Lida Clouser. I have lived and worked in Valley County, ID for the last 22 years. I have raised my family in the same location; my children are hoping to call McCall their home after they finish their studies. The success of my small business depends on recreational opportunities near South Fork of Salmon river. As such, I have a strong relationship with Valley County and the impact of the proposed mine on our area and community is strongly on my mind.

I urge you not to approve the mine operation and question SDEIS deeply. Even a "No-Action" alternative would protect against many negative impacts.

Below are just a couple of reasons amongst many why the Forest Service should reject the proposed mine plan:

1. HAZARDOUS MATERIALS and RISKS

If approved, the Stibnite Gold Project will require large quantities of hazardous materials to be transported to and from and used at the mine site during the 15 years of mining operations (Table ES-1) and, to a larger extent, for as long as water treatment is necessary.

Hazardous materials include fuels, explosives, acids, cyanide, ammonium nitrate, lime, antimony concentrate and other toxic substances. All these are highly poisonous to animals and humans.

In total, more than 3,000 loads of hazardous materials would be transported to or from the mine every year during operations (Table ES-1). The loads would include more than 8,300,000 gallons of flammable materials (diesel, propane, gasoline) as part of more than 9,400,000 gallons of hazardous bulk liquids to be brought to the mine site annually. In addition, more than 46,000 tons of hazardous bulk solids would be transported to or from the mine site (Table ES-1). This includes the annual use of 4,000 tons of sodium cyanide, which would be delivered in 167 trips carrying 24 tons each, or roughly one trip every other day.

Isn't there be a high hazard should a spill happen along HWY55 and extend into the NF Payette River? This high risk obviously exists along mine access roads into the SFSR, Johnson Creek, and EFSF and its tributaries. One spill could kill 100% of the eggs, fry, juveniles, and spawning adults of up to four species of fish to name just one aspect.

I ask: Why are there no project-specific spill risk calculations for numbers of spills and spill probability in the SDEIS? (SDEIS 4-345).

Why wasn't HWY55 (through Boise, McCall, and New Meadows), nor HWY95 corridor considered in any transportation analysis? The estimated spill rate per truck mile in the SGP SDEIS is many times lower than should be calculated because the "estimated amount of miles traveled" only assumes mileage from the Highway 55/Warm Lake Road junction. Risk extends from the origin of the reagents to the mine and all the way to the final destination. (SDEIS 5-34).

This extends to Environmental Impacts. The proposal violates the Payette and Boise Forest Land Resource Management Plans and fails to minimize all adverse environmental impacts, thus violating two federal laws - the Federal Land Policy and Management Act and the Organic Act. The SDEIS also violates the Clean Water Act and conflicts with established Treaty Rights.

2. RECREATION IMPACTS

The South Fork Salmon River watershed and the project area provide some of the best access to recreation in the western US.

West Central Mountains Economic Development Council (WCMEDC). who's goal is "the creation and maintenance of a climate that fosters economic growth and viability in Valley County", supports recreational opportunities as one of the most viable economic resource in the region. The proposed mine will impact negatively all of the recreational economy resources listed by the council here:

<https://wcmedc.org/recreation/>

Many recreational activities are not sufficiently analyzed in the SDEIS.

Both action alternatives will have impacts on recreation: "localized, long term, and major." Public access routes are to be controlled by Perpetua company. Road closures will affect the ability of outfitters and guides to provide access and will degrade the customer's experience.

Under either alternative, access to the project area would be impacted by increased mine related traffic. This increase would degrade remoteness that makes recreating in this area desirable.

Recreation in the 14,211-acre operations boundary will be eliminated for the life of the mine and future generations. (SDEIS 2-160. The map shown in Figure ES-1.)

This area is larger than the 2,500 acres where vegetation will be cleared for the mine and roads. The 14,000+ acres operations boundary is the ambient air boundary from the air permit. That means recreational activities will be affected because of pollution.

The mine's facilities will displace wildlife-based and non-motorized recreation opportunities. As a small business owner who concentrates on recreational cycling opportunities, I feel threatened about having to cross out the South Fork of Salmon River off the tour map. The nationally recognized and popular cyclist's "Idaho Hot Spring Route" will need to be canceled as well as the recently developed "Cascade Adventure Routes". These routes are bringing hundreds of recreationists to the area every season. Each participant supports Valley County economy while visiting!

Again, I urge you to question SDEIS deeply. SDEIS's negative effects outweigh the proposed positive outcomes to my community. Do not approve the mine!

Thank you for your consideration
Lida Clouser
McCall, Idaho