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First name: Amy

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Organization:

Title:

Comments: To the Payette National Forest,

I am writing to provide informed local comment on the proposed Stibnite Gold Mine.

I am a lifelong resident of Valley County and my husband and I own and operate a business in McCall. We are frequent visitors to the South Fork Salmon for general recreation. The unspoiled nature of these rivers is at the heart of our life in Idaho.

In section 3.4.3.3.17 SOCIAL AND ECONOMIC CONDITIONS, the DEIS notes that "Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies". It is vital to understand how the project would impact tourism in McCall, Riggins (which relies heavily on tourism and use of the Salmon River for boating and is downstream of the mine) and other areas. In addition, these local economies are also impacted by backcountry recreation with hikers, backpackers, kayakers, campers etc. along the Lick Crick Summit, the South Fork corridor, and near Yellowpine.

The cited recreation use on pg. 603 "The analysis area is a popular area for a variety of recreation activities on both private and public lands." However, the DEIS has no substantive study on the proposed mine's impact on tourism, either directly in these communities or as a ripple effect due to increased noise, traffic, light, and pollution in the backcountry. A summary statement of the importance and abundance of recreation in the analysis area is provided; however, the entirety of the recreation section does not mention or address how recreation will be impacted by the Stibnite project, nor does it provide recent sources in its descriptions of uses. Sources cited from 2003-2010 are outdated especially in the context of Idaho's booming population, noting its value of recreation (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please provide a study specifically on the impacts to economic and social cultural benefits of recreation to local communities and state, national, and international visitors. This study must use current data that more accurately reflects the usage of these areas and their impact on local cultures and economies. This question alone requires a supplemental DEIS that can be reviewed.

The potential impacts of the proposed Stibnite Gold Mine are far reaching and would require amendments to both the Boise and Payette NF Forest Plans. Areas proposed to be amended include duration of fish, wildlife degradation, total soil resource commitment, visual quality, and water diversions. For a waiver of this geographical scope and a time scale more than 15 years (as in the duration of fish and wildlife degradation), a plan level amendment is required and should not be included in a project specific amendment. Project specific amendments are for short term effects like in the case of adding small amounts(0.6 miles) to a road system, and should not include anything like what Midas is requesting. However, the process of a plan level amendment was not followed per 36CFR § 219 in the regulations. Secondly, certain standards cannot be amended by the USFS because they are tied into the endangered species act consultations and the USFS doesn't have authority to waive them. Finally, any waiver of these standards requires disclosure of the effects that the waiver itself is going to generate. There are no details given in the DEIS of these effects. Please amend the amendments to plan level as per 36CFR § 219 in the regulations, or in the least provide specific details on how these waivers will effect the plan for both the Boise and Payette National Forests.

Thank you,  
Amy Rush