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Comments: Attention: Linda Jackson, Payette Forest Supervisor

Date: October 26, 2020

From: Susan Bechdel

To Whom It May Concern:

Thank you for the opportunity to comment on the DEIS for the Proposed Stibnite Gold Project. As this letter pertains to the project and the project area, and in particular points out oversights and omissions, please consider it a substantive "comment letter".

In this letter, I will address recreation in the project area, its value to the economy of the surrounding county and the state of Idaho as well as the intrinsic value recreation in the project area holds due to unique characteristics.

The Executive Summary of the DEIS states in the Project Overview that the "area is a complex blend of both remote wilderness lands with high recreational values and potential wilderness characteristics...." (DEIS ES 2.0).

Furthermore, the Executive Summary identifies eight significant issues, each of which is inherently linked to recreation. For example, a first-rate fishing experience relies on the quality of the water as well as the habitat, including wetland and riparian areas. Likewise, all recreational experiences are directly or indirectly impacted by traffic, public access, visual quality and often the existence of inventoried roadless areas. In this context, please consider my comments on recreation to extend to all of the DEIS identified "Significant Issues" (DEIS ES 6.0).

Those "high recreational values" that the DEIS cites in ES 2.0 are critical to a sustainable and forward-looking economy for both Valley County and the State of Idaho. This fact is supported in USFS documents, the Valley County Comprehensive Plan and state and national economic statistics. Additionally, the unique and unparalleled characteristics of these recreational opportunities are extensively documented in recreation journals and publications.

The USFS highlights its goal of "Caring for the Land and Serving People" at the top of the website page about managing the land. The primary focus is to manage the lands "for sustainable multiple-uses to meet the diverse needs of people, ensure the health of our natural resources, provide recreational opportunities...." ([www.fs.usda.gov/managing-land](http://www.fs.usda.gov/managing-land)). According to the National Forest Management Act and ROS, the USFS is required to provide those recreational opportunities.

The Payette Forest touts the following activities on the USFS website: Bicycling, Camping and Cabins, Fishing, Hiking, Horse Riding and Camping, Hunting and Nature Viewing, OHV Riding and Camping, Outdoor Learning and Picnicking, Water Activities, and Winter Sports. (<https://www.fs.usda.gov/recarea/payette>).

Valley County's local economy is transitioning from a declining resource extractive industry to the more sustainable income source of tourism and recreation. As laid out in Chapter Nine of the Comprehensive Plan, "the economy of Valley County has been dependent upon the government, timber, mining and agriculture. With major segments of the economy being seasonal employers, high unemployment has been a part of the traditional seasonal economic pattern. The single most important fact about the economy of Valley County is that the economic pattern is in a state of change." (Valley County Comprehensive Plan, p. 45).

In fact, "the county has begun a slow, measured recovery with recreation remaining a driving force. From the

backcountry communities of Big Creek, Yellow Pine, and Warm Lake to the 3 established communities of McCall, Donnelly, and Cascade, people continue to come to Valley County for its incredible beauty and unlimited recreational activities. Our connected society is allowing those who enjoy an outdoor lifestyle to move here on a permanent basis, and the area attracts a fair share of retirees each year" (Valley County Comprehensive Plan, p. 2-3).

Therefore, the county lists as Goal 1 under Recreation, "To promote and support a viable recreation and tourism program that is in harmony with the Land Use section of this plan" (Valley County Comprehensive Plan, p. 52).

"Valley County is considered a recreation paradise. It is ideally suited for nearly every form of outdoor activity...Perhaps the county's most valued recreational assets are its breathtaking scenic attractions...Hiking, backpacking, mountain biking, Nordic skiing, whitewater rafting/kayaking, and hunting and fishing have increased dramatically in the past twenty years, as has the use of off-road recreational vehicles, motorcycles, all-terrain vehicles, and snowmobiles" (Valley County Comprehensive Plan, p. 51).

On a national scale, "Outdoor recreation is among our nation's largest economic sectors...with consumers spending \$88.7 billion annually on outdoor recreation and creating 7.6 million American jobs" (<http://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>).

The State of Idaho shows that recreation and tourism generates \$7.8 billion in consumer spending and supports 78,000 jobs. 79% of Idaho's residents participate in outdoor recreation: and recreation opportunities is a recruitment tool for businesses used to attract and retain workers (Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020).

Although there are many inherently unique components to the project area, the South Fork Salmon is one I am most familiar with. The South Fork provides habitat for fish protected under the Endangered Species Act and boasts some of Idaho's best expert-level whitewater. It is designated eligible and suitable for federal Wild and Scenic status and feeds directly into the Main Salmon - a Wild and Scenic River that is the second longest free-flowing river in the lower 48 states. "As a major tributary to the WSR-designated Salmon River, the (South Fork Salmon) river supports whitewater recreation opportunities from around the nation" (DEIS 3.23.2.3.1).

Unique among premier whitewater rivers, "The South Fork of the Salmon River is a quintessential whitewater paddling watershed, with numerous quality roadside runs and one of the west's most classic multi-day self-support trips. It's crystal clear free-flowing water, wild scenery, and incredible rapids make it a veritable whitewater paradise and a draw for paddlers worldwide....Multiple rural economies in Idaho rely heavily on these forms of river recreation intimately tied to the pristine water quality and unmarred wilderness of the Salmon River drainage," said Evan Stafford with American Whitewater. Given the potential threat from upstream mining activity to critical fish habitat and unique recreational offerings, American Rivers named the South Fork Salmon one of the nation's most threatened rivers for three consecutive years (<https://www.americanrivers.org>).

Clearly, there is an abundance of data supporting the value of recreation in the project area; both for its remarkable and unique characteristics and the major role it plays in local economies. The DEIS itself acknowledges the significance of recreation and the South Fork in particular. It also notes that "Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies" (DEIS 3.4.3.3.17).

However, that is where the DEIS drops the ball.

Nowhere in the entire Recreation section is there mention of how the project will impact either recreation, tourism or the related economic benefits to the communities. This is a glaring omission. Many sources and references are out of date (2003 and 2010).

A supplemental analysis is needed accordingly. It must include: 1) current and projected population trends, 2) current and projected recreation trends, 3) the status of the local recreation/tourism economy and its ranking in importance to communities, and 4) the social and cultural benefits of recreation to surrounding communities. It would not be a stretch to additionally consider the value of outdoor recreation in terms of an ongoing or subsequent pandemic.

There is no wilderness area of comparable size and beauty in the United States and no such concentration of wilderness rivers; hence very few areas offering such unparalleled opportunity for recreation. My husband and I spent our careers as outfitters on the Middle Fork and Main Salmon and saw what those experiences mean to people from all over the world. We still have colleagues in the outfitting and guiding industry within the project area. They rely on the current status of water quality, wilderness values and habitat for their livelihood. My family has kayaked in Chile, Alaska, Pakistan, Bhutan, Japan and more; yet still count the South Fork Salmon as their favorite river. My long-deceased grandmother traveled the globe and claimed her week at Wapiti Meadow Ranch on Johnson Creek was by far her most interesting and enjoyable trip.

The area not only holds a special place in the heart of many outdoor enthusiasts; it represents a dominant part of the economic viability and healthy lifestyle of surrounding communities. These are values that should be preserved in perpetuity and not sacrificed for short-term gain.

Thank you for your due diligence in requiring a thorough analysis of the project's impacts and provisions to mitigate any threats. I appreciate the opportunity to comment.

Susan Bechdel