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Title:

Comments: The effects of Alternative 5, the No Action Alternative are not complete as described in 4.2.2.5 of the DEIS. Under Alternative 5, the possibility of having the Stibnite Mining Area designated as a Superfund site has not been considered. The Comprehensive Environmental Response, Compensation, and Liability Act otherwise known as CERCLA or Superfund provides federal funds to clean up uncontrolled or abandoned hazardous-waste sites - like the Stibnite area.

This area was recommended as a Superfund site about 20 years ago. The reason it did not become a Superfund site is that the Valley County Commissioners objected and asked the State of Idaho to reject this plan. The site could still be designated as a Superfund site.

What could be done: Reconnect stream habitats (Glory Hole to Meadow Creek), isolate historic mine waste from streams, obliterate roads, restore degraded riparian areas, stabilize slopes and revegetate denuded mine areas. Where: Meadow Creek, East Fork of South Fork, Sugar Creek. Road obliteration work could be completed on both public and private lands.

If the No Action Alternative is selected rather than an action alternative, CERCLA funds could be used to restore this site. This approach would keep in place all of the rehabilitation that has been accomplished over the last 20-30 years. Millions of dollars have been spent to get the site back to the condition it is currently in.

This approach would avoid all of the adverse effects predicted in the DEIS. It would move this site and the downstream affected sites back to the original condition (prior to the Stibnite mining era) much sooner than any of the action alternatives.

Designation of the site as a Superfund site should be included in the analysis of Alternative 5, the No Action Alternative.