

Data Submitted (UTC 11): 1/9/2023 5:49:20 PM

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Comments: To: Linda Jackson, Payette Forest Supervisor

Date: January 9, 2023

From: Susan Bechdel

Thank you for this opportunity to comment on the Supplemental Draft Impact Statement for the Stibnite Gold Project.

As an engaged citizen of Valley County for over 35 years, I care deeply about the environmental integrity of what I consider my home. My husband and I moved here in 1985 to start a whitewater rafting operation on the Middle Fork and Main Salmon, two rivers that could be degraded by air pollution and accidental spills from the SGP. We hunt, bike, camp, fish and paddle throughout the Frank Church River of No Return Wilderness and the South Fork and Lick Creek areas.

Although I find many omissions and unanswered questions in the SDEIS alarming, I will focus this letter on two issues that are of personal concern to me. Those are the impacts to our recreational economy and several risks from transportation.

I will ask two questions. How will Perpetua mitigate the lost revenue from degraded recreation and how will the Forest Service guarantee that Perpetua is held accountable for all risks associated with transportation for the full route of mine-related travel?

The SDEIS addresses benefits to the local economy but is silent on the risks. Therefore, a local group of businesses and individuals, the Idaho Headwaters Economic Study Group, commissioned an independent study on all impacts to the economy, both negative and positive. According to that study, "Valley County's productive economy is built around visitors and the recreation experiences they seek. The proposed Stibnite Gold Project would site a large industrial chemical project in the headwaters of one of the most important recreational rivers in the Inland West." The study asks, "...what part of the world-class natural environment...and the economy built around it should be put at risk of permanent damage in the name of adding 100 local mining jobs"?

The SDEIS admits that "both alternatives would result in impacts to recreation access, settings, opportunities, use, facilities and recreation-related special use permits." It would "remove the mine area from recreation use and alter the recreation setting in the surrounding area due to visual changes and noise." (SDEIS ES-27) Those impacts only apply to analysis within the Operation Area which is clearly too narrow in scope. It misses numerous trailheads, access points and campgrounds that will be impacted by either action alternative.

The increase in traffic, regardless of alternatives, will likely result in an increase in recreational-related traffic along the South Fork Salmon Road and Lick Creek Roads. Both are primary access routes for fishing, hiking and whitewater paddling in particular. Will Perpetua be held accountable for the additional cost of maintaining those roads?

Likewise, the SDEIS fails to incorporate any sort of analysis downstream of the East Fork of the South Fork. The South Fork Salmon River is a world-class destination in itself, but also feeds into the Wild and Scenic Main Salmon River. Any negative impacts to water quality as a result of the SGP stand to degrade the experience of a vast number of private boaters as well as 33 licensed outfitters who operate commercial float and fishing trips along the protected waters.

The Forest Service determined that "No significant impacts were identified for special designations," (p. 4-623). Meaning that there would be no negative impacts on rivers protected by the Wild and Scenic Rivers Act (WSRA) associated with this project. However, that statement is not accurate.

Through the SGP, Idaho's designated Wild and Scenic rivers may be adversely affected by construction, operations, and closure activities. However, the SDEIS fails to recognize any of these rivers in its analysis. The Middle Fork of the Salmon River and the Main Salmon River are both protected under the WSRA and could face the far-reaching impacts of this mine. Light, visual, water, and dust pollution are direct effects that could harm ORVs (Outstanding Remarkable Values) on the Middle Fork of the Salmon.

The Main Salmon is at risk of any pollution that contaminates the South Fork of the Salmon (SFSR) and the East Fork South Fork of the Salmon (EFSFSR) as their water flows into the Main Salmon. Both the SFSR and the EFSFSR lie near the access routes and the area of operations. Also, some rivers are eligible and suitable to be designated under the WSRA that lie within the analysis area of this project. Under the WSRA and Payette National Forest Plan, eligible and suitable rivers must be preserved in their free-flowing state as well as have their water quality and ORVs protected as if they were a designated Wild and Scenic River. Within the analysis area, three rivers are deemed either eligible or suitable: Burntlog Creek (eligible), Johnson Creek (eligible), and the South Fork of the Salmon River (SFSR) (suitable).

Perpetua must take responsibility for the potential (and forecasted) decline in the local recreation-based economy. How will the Forest Service address this missing component?

There are many unanswered questions relating to transportation. These include the lack of adequate mitigation for avalanche and earthquake potential, recovery from accidental spills and the big question of who will pay for road repairs and maintenance in the area of use that is ignored in the SDEIS. Perpetua is only claiming responsibility for transportation between the mine site and Cascade, ID. The Forest Service and Perpetua are required to complete a transportation analysis of the full route. Will the Forest Service hold Perpetua accountable for any accident or spill outside the Warm Lake/Highway 55 boundary?

Furthermore, trucks traveling on the north side of the mine will cross either the North Fork of the Payette River or pass by Big Payette Lake. Both are critical waters and a toxic spill into either would be disastrous. The river is designated by the Idaho DEQ as an impaired waterway under the Clean Water Act and the lake is the single source of drinking water for the City of McCall. Where is the action plan in the event of a spill into either waterway?

I live on the north side of McCall on Highway 55 along a stretch of residential development. It is north of the junction of the Deinhard-Boydston bypass and Highway 55, so will be used by all trucks traveling north. There are numerous driveways with direct access to the Highway and a small ski area (The Little Ski Hill, used mostly by children) right on the road. It is already difficult to pull into fast traffic and the addition of between 52 and 66 AADTs per day (based on Perpetua's assumptions with 52 AADTs during operations and 66 during construction) will make that unsafe and nearly impossible. Who will pay for Highway maintenance? Who will pay for recovery from accidental spills of hazardous materials? The taxpayer must not be held responsible.

The missing pieces, the unanswered questions and irresponsible assumptions in the SDEIS are staggering. The clear path forward is to choose the NO ACTION ALTERNATIVE until these questions and concerns are addressed.

Again, thank you for this opportunity.

Sincerely,

Susan Bechdel

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