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Comments: To: Matt Davis, Forest Supervisor, Payette National Forest

Stibnite Gold Final EIS

Hallo,
my name is Ludmila Clouser. I am a long time Valley County resident, bicycle tour guide and a mother of 2 young adults who plant to establish their future lives in Valley County.

I submitted objections to proposed Stibnite Gold Project in 2020 and 2023 via letters #17581 and #7811.
I argue that my objections were not properly addressed; therefore I ask to consider these again.

One of the objections stated in my letter #17581 concerns an impact on Recreation. The objection stated:
"The project area provides 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/."

The response to my comment (pg.523) states that : "The South Fork Salmon River Road would not be used by the SGP and there would not be
any mine related traffic on it. As presented in Section 2.4.4.5, additional traffic on the roadways during construction would increase by 199 on highways and local roads to the Stibnite Gold Logistics Facility and 65 vehicles between there and the operations area. Traffic during operations would be less than that.
The regulatory definition of ambient air (40 CFR 50.1(3)) is "that portion of the atmosphere, external to buildings, to which the general public has access." There would be no recreational use within the Operations Area Boundary for public safety and therefore, would not result in a new effect on recreational use because the mining activity would be excluding recreational use inside the boundary due to the mining activity.
Use of the Johnson Creek Route during construction could result in temporary impacts to bicyclists and bicycle events that use these roads, due to potential delays, traffic, and safety-related issues from mine-related traffic (Section 4.19.2). Potential impacts to biking events was disclosed in Section 4.19.2 under Recreation Use and Users subsections. These would be temporary impacts while the Burntlog Route is being constructed. Once constructed, mining traffic would switch to the Burntlog Route."

This response covers the route options and alternatives for cyclists. The response is inadequate to the full scope of impact on bicycling, events, tours and recreation and tourism economy that will suffer as a result. Chapter 4 Environmental Consequences contains an evaluation of Irreversible and Irretrievable Commitments of Public Resources on each Resource in question. Findings show Irreversible and Irretrievable losses on all of the Resources including Recreation whenever Action Alternatives are considered!
For example:
Stibnite Gold Project Final Environmental Impact Statement 4-605 : "Both irretrievable commitments also would affect the ability of recreation-related special use permittees to provide IOGLB licensed activities, and/or may change recreation experiences for customers.
Changes to the recreation setting during construction, operation, and closure and reclamation, and the

resulting potential displacement of recreational use to other locations, would be an irretrievable commitment of resources, particularly for FCRNRW areas where the recreation setting was affected. Changes to the recreation setting within the Operations Area Boundary and Burntlog Route, transmission line upgrade areas, and new transmission line ROW to the Operations Area under the 2021 MMP would be an irreversible commitment because the transmission line ROW would be a modification to the recreation setting of many areas and existing recreation facilities, and the Operations Area Boundary and Burntlog Route would be large reclaimed areas that would take a long period of time to fully revegetate to the point where the sights and sounds of humans would return to existing levels (if ever). Therefore, the recreation setting of these areas would experience long-term and potentially irreversible alterations."

Another quote from 4.19.2.2 2021 MMP: "Adventure Cycling and Mountain Biking use of the Warm Lake Road during the life of the SGP could result in long term impacts to bicyclists that
use this road as part of the Lick Creek loop route or the Idaho Hot Springs route." Other impacts are listed elsewhere in 4.19.2.

The nationally recognized and popular "Idaho Hot Spring Route" for cyclists will need to be reconsidered as well as the recently developed "Cascade Adventure Routes". Currently, these routes are bringing hundreds of recreatonists to the area every season.
Tourists will not want to come and spend their money in the area where "increase (in traffic) by 199 on highways and local roads to the Stibnite Gold Logistics Facility and 65 vehicles between there and the operations area" will be happening, area where "the mining activity would be excluding recreational
use inside the boundary due to the mining activity", where access routes will be controlled by Perpetua company, to a place where
hazardous materials will be transported in a near vicinity and may spill! The mine and its operations will, if not directly, than indirectly degrade the customer's experience to a great extend. As a bicycle guide who concentrates on recreational cycling opportunities, I feel threatened about having to cross out the area of impact off the tour map.
Per the National Forest Management Act and ROS, the FS is required to provide recreation opportunities. As Idaho is currently the fastest growing state in the nation since 2016 and it is noted that current and inbound residents value recreation highly (a motivating factor in their move to this state) (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019), please include and disclose more recent resources for recreation use analysis of this area. The 2003 Payette National Forest Resource Management Plan that directs and guides all uses of the PNF including recreation has not updated it since 2003!

Another objection in my Comment Letter #17581 concerns Hazardous materials. It states: "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). "
In response to this comment, the FEIS at Appendix B-(pg #209) states: "A revised incident risk analysis for hazardous materials has been added to Section 4.16.2 of the Final EIS. This includes an analysis of longer transportation routes on existing highways than was included in the SDEIS and examines recorded and predicted incident rates along those highways including incidents involving hazardous materials. 4.16-2 shows that all traffic related to the SGP operations (the phase involving the most truck deliveries of hazardous materials) would access the site via Cascade and the Warm Lake Road to the SGLF. Table 4.7-1 lists the hazardous materials for fuel, gasoline, propane, ammonium nitrate, and sodium cyanide (Section 4.7of the EIS)."
The FS response stating that the increase in hazardous waste transport traffic will only be along Warm Lake Road and Cascade and will be "relatively small" in impact is inadequate because ANY spills happening along Warm Lake road and in Cascade will impact the environment in all of Valley County greatly! Plus, 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. It also violates the Clean Water Act and conflicts with established Treaty Rights.

As for my 5 additional comments in letters #17581 and #7811 that where placed in GEN category and to which the FS response states: "No further response required. General in nature or position statement. It is acknowledged and understood that concerns regarding potential long-term environmental impacts, ecological integrity, and the well-being of potentially affected communities are valid and important to consider. During the decision-making process, the Forest Service will seek to identify the best possible balance between environmental protection, community needs, and sustainable forest management" I argue that the treatment of my comments placed in GEN category concerning fish, fish habitat and reclamation is inadequate.

For example, Ch.4 FEIS 4.12.4.2 states facts about Fish Mortality that point to violation of Endangered Species Act.
The Stibnite Gold Project would significantly modify critical habitat for Endangered Species Act (ESA) listed species. According to the USFS website "Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat."
Both chinook salmon critical habitat and bull trout critical habitat are in the analysis area and these habitats will be adversely modified with either alternatives.

My other General Category objection was concerned with Reclamation.
I am concerned with the possibility of failure with the reclamation. The lack of available soil is a challenge combined with the poor quality and arsenic concentrations of soil that may be used. Potential impacts to surface and ground water due to metals leaching are present. The EPA raised concerns about impacts to water quality with soils that had elevated concentrations of antimony m, arsenic and mercury. In addition - the lack of good soil would delay any rebuilding of riparian banks on impacted streams leading to more rise in water temperature.

A financial guarantee is needed to protect clean water and fish. I am concerned about the cost to taxpayers and the impact to the environment if the bond is insufficient to cover mine reclamation closure. The EPA and others raised concerns about the lack of a transparent process to determine the financial assurance bond for the mine. Public disclosure of the methods the FS is using for calculating the financial assurance bond and a chance to review it by the public would be appropriate.

Mines leave irreversible and irretrievable affects! This is a fact. Do not allow the Stibnite Gold to scar the recreational area that future generations hope to encounter and our economy can thrive on as is.

I urge you again to withdraw the FEIS and DROD and not issue any decision or take any action based on the inadequate FEIS. Please demonstrate full compliance with each and every law, regulation, policy, Treaty, and requirement.

The regional Forester should withdraw the FEIS and DROD and instruct the Payette NF to correct all errors before approving or taking any actions.

Thank you for your consideration. Ludmila Clouser