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Organization:
Title:
Comments: October 21, 2024
Reviewing Officer, Stibnite Gold Project
Subject: Objection to the Stibnite Gold Final EIS
I am writing to formally object to the findings presented in the Stibnite Gold Final Environmental Impact Statement (EIS). There are so many inadequacies that my busy life doesn't allow me to cover them so my concerns focus on the information detailed on pages B567, B568, and B569, authored by myself during the DEIS, which warrant further scrutiny. The FEIS does not adequately address my concerns and uses flawed methods and old data which have no consequences for Perpetua, who should follow published standards that your agency is obviously overlooking and the standards and the recommendations that are specifically mentioned by the "Power Economic Study" that was paid for by over 50 McCall Businesses. Concerning the Power Study, the agency's inadequate responses are found in 26 pages of the FEIS at B-581 to B-607.Agency responses were cursory and incomplete. The comments related to socioeconomic issues that I submitted in response to the SDEIS, (summarized in Appendix B of the FEIS), were not addressed. I am also picking one issue that is dear to me - affordable homes, do do a detailed comment on. Wish I had time to do more…
From FEIS p.3-474, 475:
During the 1990s and early 2000s, Valley County experienced considerable growth in new housing units. However, since the 2008 recession, new housing construction has been relatively limited. In 2010, Valley County had an estimated total of 11,789 housing units, which increased by only 439 additional housing units by 2018 (3.7 percent increase). Similarly, from 2010 to 2018, Adams County added only 47 additional housing units (1.8 percent increase) (Census 2010, 2020). The majority of Valley County's housing inventory consists of vacation/ seasonal second homes for out- of-county residents (Census 2010, 2018). Of Valley County's 12,228 housing units in 2018, nearly 72 percent (8,767 units) were occasionally vacant. A total of 8,423 vacant units were reported for seasonal, recreational, or occasional use (i.e., generally second homes) with 225 non-seasonal vacant units for sale, rent, or otherwise vacant (Census 2018). Adams County reports a much lower vacancy rate of 38 percent; however, like Valley County, mostNn vacant units are reported for seasonal, recreational, or occasional use (897 units), with 96 units available for sale, rent, or otherwise vacant. Residential communities within the analysis area are well-established and stable. Most residents own their homes, with approximately 26 percent and 33 percent having lived in their current place of residence for 20 years or more in Valley and Adams counties, respectively (Census 2018). The data suggest much of the housing formerly available to permanent residents has been sold to second home buyers, increasing the number of occasional housing units and decreasing the availability of housing to local residents (Highland Economics 2018). Census data on housing prices in Valley and Adams counties do not show an increase in sale price resulting from a relatively low availability of housing, as median owner- occupied housing prices for both counties have fluctuated but generally not risen since 2010 (Census 2010, 2018; Highland Economics 2018), as shown in Table 3.21-2. However, more recent 2021 real estate data for Valley and Adams counties shows a 41 percent increase in median home prices over a twelve-month period. Conversely, median rental rates increased in Valley County by 4.5 percent ($727 in 2010 to $760 in 2018) and in Adams County by 22.8 percent ($504 in 2010 to $619 in 2018; Census 2010, 2018).
Between 2010 and 2018, the percentage of Valley County households paying more than 30 percent of their household income on rent grew from 33.5 percent to 59.1 percent (Census 2010, 2018b). This increase indicates that the local rental market is becoming less affordable.However, the percentage of households paying more than 30 percent of their household income on rent decreased from approximately 50 percent to 39.9 percent in Adams County indicating that its local rental market has become slightly more affordable (Census 2010, 2018b) Development of a City of McCall Housing Strategy (City of McCall 2018a) led to the McCall Area Local Housing Action Plan (City of McCall 2022) to address housing needs with regard to an estimated need for 730 additional units. The plan also included measures to reconcile affordability of new housing compared to current market

prices.

This response is very poor. The Forest Service fails to consider easily available local data on housing and provides assumptions to draw conclusions that there will be little or no adverse impacts to housing. If the FS did a "Hard Look", required by NEPA, at CURRENT DATA it would find out that:
The City of McCall has done almost nothing on its Housing Plan since adopted. Certainly, no funding, buying land or starting discussions on a project.
Prices in McCall and surrounding areas have increased at a higher rate than almost anywhere in the State.
Affordable housing in McCall is unavailable.

My comments are still valid and your responses to them in the FEIS are disingenuous and inadequate. The socio-economic impacts on local communities must be more thoroughly examined. The proposed project could lead to significant disruptions in local livelihoods, and it is crucial that the EIS reflects a comprehensive understanding of these socio-economic dimensions.

The analysis presented in the FEIS overlooks critical environmental impacts associated with the proposed mining operations. Specifically, the potential effects on local water sources and wildlife habitats have not been adequately assessed. Given the sensitivity of the region's ecology, it is imperative that we consider more robust environmental protections.
Lastly, I urge that you reconsider the mitigation measures outlined in the EIS. The proposed strategies do not provide sufficient assurances that there will not be potential long-term environmental consequences.
Thank you for considering my objections. I believe it is essential to prioritize environmental sustainability and community welfare in this process. I urge the that the FS revisit all the concerns raised regarding the Stibnite Gold project by withdrawing the FEIS and undertakes a revised FEIS to do the serious work that must be undertaken to provide that Valley County is well protected economically, our residents are safe in the environment and on our roads, and our waterways remain clean and healthy.
Sincerely,
Richard Fereday