These comments on the Stibnite Gold Project (SGP) Draft Environmental Impact Statement (DEIS) of 8/14/2020 are submitted by Bruce Rankin, a resident of McCall, ID / Valley County, ID. I retired from Boise Fire Department, having served 25 years in the Operations Division with positions of Firefighter, Senior Firefighter (Driver), Captain, Battalion Chief, and Operations Division Chief. As DC OPS, responsibility included supervision of specialty teams; Dive, Technical Rescue, and Hazardous Materials. I was a Type 3 Planning Section Chief for Boise’s Incident Management Team.

To begin, I ask that the comment period, which expires on 10/28/2020, be extended through 12/15/2020 which would allow for a 120 day response to a large, fractured and confusing document.

My concern is wide-spread with SGP’s project and the SGP’s effect on the health and well-being of an environment intended to support animals, plants, fish, and where people live and recreate. Due to the vast subject matter of this DEIS, my commentary focuses on the practical aspects of emergency response to human-caused impacts. For accident and emergency response, this DEIS document focuses on a geographic area North of Warm Lake Road to and including the SGP footprint. There is significant potential for emergency response to SGP-generated incidents over many miles of roadway outside SGP’s operational footprint. This issue needs to be addressed with the general population, emergency response entities and governing bodies for a full understanding of potential impact and cost of incidents. I urge the FS to accept alternative 5.

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Appendix D – Mitigation Measures

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| Item | SPG DEIS Language | BR Commentary |
| FS 19 | Commercial transport vehicles also will be inspected at Knox or Landmark by the driver prior to accessing Johnson Creek. Transport companies are required to document DOT annual inspections and Landmark vehicle inspections.  | Idaho State Police could likely provide evidence of a significant lack of compliance with DOT-mandated vehicle safety and operational measures. How will SGP ensure that contracted commercial carrier operators will actually complete and document valid vehicle inspections? |
| FS 21 | An emergency fire response plan, including emergency notification contacts will be posted on site and staff will be trained in emergency response procedures.  | What type of emergency response training will SGP staff receive and who will provide the training? What is the plan for recurring training? |
| FS 23 | Several fire-response kits will be spaced strategically around the project area.  | What type of kit (purpose specific?) and who will have responsibility for upkeep? |
| FS 26 | A site-wide health and safety plan will be developed and provided to the Forest Service. As part of the Health and Safety Plan, medical, fire, and weather emergency response procedures will be developed, and all employees and contractors will be familiar with these procedures.  | Who will develop a site-wide health & safety plan? How and when will all employees receive familiarization with the plan? What is SGP’s definition of familiarization? |
| FS 57 | Noxious weeds and undesirable non-native plants will be eradicated in the Operations Area boundary, within permitted use areas, and the cut/fill slopes of roads and trails used by mine and mine facility related traffic. Where it is not practical to eradicate existing infestations, infestations will be managed to prevent seed production and spread. In areas of existing extensive infestation, mitigation for noxious weed prevention will be incorporated into road layout, design, and project alternative evaluation. Measures to reduce the potential for spread and establishment of noxious weed infestations will be included in the updated Weed Management Plan.  | Concerning non-native and noxious weeds, what type of eradication (mechanical, chemical, etc) method(s) are planned? How do you plan to manage to prevent seed production? |
| FS 59, 61, 69 | Earth-disturbing equipment such as cats, graders, and front-loaders will be cleaned to remove all visible plant parts, dirt, and material that may carry noxious weed seeds prior to entry onto the Project area and again upon leaving the Project area, if the project area has noxious weed infestations. Wash sites will be located: (1) where they are easily accessible and useable, (2) on gravelly or well-drained soils, (3) where wash water runoff will not carry seeds away from site, (4) where wash water runoff will not directly enter streams, and (5) where they may be used repeatedly for several activities within the area.  | How will SGP mitigate non-native and noxious seeds from wash sites? What type of training will personnel assigned to application of chemicals receive? Has SGP done a thorough inventory of non-native and noxious weeds within the operational footprint? Has SGP identified what type of chemical application may be needed for each species? How will you manage application processes? |
| FS 75 | All Forest Service, county and state speed limits, road restrictions and load limits will be observed by staff and contractors during travel. Personnel and contractors will be encouraged to drive at speeds appropriate for reducing the possibility of vehicle- wildlife accidents. Vehicles will be requested to slow down to speeds necessary to minimize the fugitive dust generation or the route watered if significant dust generation is produced during vehicle travel. If appropriate, during equipment mobilization and demobilization, pilot cars will be used to ensure appropriate speed and reduce potential for conflicts or incidents along the narrow access roads leading into the project area.  | It has been made abundantly clear (Covid mask use) that encouraging and requesting means nothing to a significant number of people. How will SGP ensure that vehicle-wildlife accidents and dust-producing driving speeds be effectively managed for the near elimination of both? How will SGP decide when conditions are such that pilot cars will be utilized? |
| FS 84 | All fuel transport drivers will be required to have spill response, safety, and resource awareness training. In this program, drivers will be informed of the Idaho State Emergency Medical Service (EMS), first hazardous materials responder actions, and the importance of anadromous fisheries that must be protected. In addition, each driver will participate in a safe-driver training course that is specific for the Midas Gold fuel convoy. The course will cover the SOP as well as discuss causes of accidents and how to minimize risk.  | The HazMat first responder training is designed to offer an awareness of what may constitute a HazMat incident. An incident response would be requested by the first responder. What organization(s) is the SGP planning to utilize for a HazMat response? |
| FS 85 | Adequate support personnel will be scheduled at all times, including a minimum of three 40-hour hazardous waste operations and emergency response (HAZWOPER)-trained spill responders.  | In a potential IDLH setting, a minimum of 4 OPS-level trained personnel are required. |
| FS 88 | Pilot and emergency response vehicles will carry appropriate containment and first aid equipment. Each convoy (between the two vehicles) will carry at least one gallon of dry plug-n-dike; three oil sorbent booms (which will be sufficient length for a worst case scenario); one bundle of sorbent pads; shovels; 96- inch by 96-inch piece of plastic sheeting; a bucket; a 55-gallon drum; and a small trash pump (or equivalent) and generator.  | SGP’s assumption with their DEIS language regarding containment equipment would be for a relatively small (<50 gal) amount of hazardous material. I doubt they are planning to transport only one 55 gal quantity of product per shipment. |
| FS 89 | The spill response team will carry sufficient containment equipment for one full tanker. This may include 4,000 gallons of empty storage capacity on standby at Stibnite Logistics Facility. If necessary, a second vehicle carrying additional spill response equipment will be added.  | The scenario SGP provides assumes a minor spill. A high-impact or rollover accident involving more than a few sealed 55-gal barrels is a major HM incident and a response capable of mitigation is likely beyond the capabilities of a SGP response team. What resource(s) is SGP planning on using for major incidents? |
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