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Comments: These comments address concerns I have with the transport of hazardous materials between Cascade and Stibnite. In particular, I am concerned about the environmental consequences of spills of hazardous materials resulting from a trucking accident. These comments are in reference to article 3 and article 4.7 of the DEIS and apply to all four alternatives, excepting that alternative 2 would have no transport of lime as a hazardous material.

Article 4.7 describes in detail the risks of spills imposed by road and weather conditions in the Cascade-Stibnite corridor. Clearly, with 49 heavy vehicles using these roads on average per day, accidents resulting in spills and release of materials will occur. The risk of spills is recognized in this section. What is missing is an analysis of the environmental consequences of spills. Without such an analysis the DEIS is incomplete.

It cannot be known where or what will be spilled. But what Midas Gold needs to do, and what is owed to the public and to regulators, is to provide a thorough discussion of the environmental consequences of a few events that would have the most serious impact on the environment. These spill events would be those that release toxic materials into a stream or river with downstream contamination. The Draft EIS in fact recognizes this possibility on page 4.7-11 "if surface or ground water were to be impacted with fuels or other hazardous materials, the potential for migration beyond the local area could occur."

Some examples of a serious spill event would be the following materials released into Trail Creek, Warm Lake Creek, Johnson Creek, or the EFSFSR:

10,000 gallons of diesel fuel. (one payload, 580 loads per year)

24 tons of sodium cyanide. (one payload, 163 loads per year)

10 tons of lead nitrate. (one payload, 70 loads per year)

antimony concentrate. (one to two loads per day)

It may be that such events are unlikely. That is not the point. The environmental effects of such spill events need to be analyzed because they could happen. And in truth, with the traffic density that is projected over the course of the 15 to 20 year life of the project they almost certainly will happen.

In summary, the DEIS is incomplete without an analysis of environmental consequences of hazardous material spills during transport from Cascade to Stibnite.