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Organization:

Title:

Comments: I am a resident of Adams County and have lived at my home in Council, Idaho for 37 years. While employed at the Council School District for 18 years, I was instrumental in developing and implementing a recycling/garbage management policy and program.

The Stibnite Gold Project will directly impact all counties along HWY 95 as well as HWY 55, and it will directly impact the Adams County and Payette County landfills. It also concerns me that the human impact of this project is not being directly addressed along with the economic impact of handling garbage/recycling, sewage and toxic chemicals. I am concerned about the effects this project will have on the air, water and soil quality for the 500 employees, as well as the effects that the 500 employees will have on the air, water and soil quality.

Here are my concerns and questions regarding 4.13-98 (Hazardous Materials and Chemicals) in Stibnite Gold Project DEIS:

1. It is concerning that the proposed waste management strategies are so limited in scope. The proposal leaves out many elements that are basic to any functional comprehensive waste plan.

- In the project area how will community garbage be managed?
- What is the plan for making recycling part of the overall strategy for community as well as industrial garbage?
- How and where will food waste at the project site be composted?
- How will you involve employees in the composting plan?
- What is the plan for coordinating transportation, storage, and disposal of community and hazardous waste?
- Where will community waste be hauled?
- How will the economic impact to affected counties of the increase in garbage and recycling be assessed and made public?
- Where will hazardous waste be hauled?
- Where are the storage areas for the hazardous waste?
- Where does it ultimately go?
- Does the County have the facilities necessary to handle hazardous waste?

2. The proposal lacks basic information about implementation and oversight. Without that basic information, there is no way to determine whether the proposed strategies could work effectively.

- In the project area, how will community and industrial garbage be managed and who will do this?
- On site, who will be responsible for insuring that hazardous materials will be kept and handled separately?
- Who will be responsible for oversight of the different aspects of waste and garbage management?
- What mechanisms are in place for regular evaluation of whether the management program is functioning successfully?
- Do you plan on hiring someone not affiliated with Stibnite or Midas Gold to oversee the Hazardous Materials Handling and Emergency Response Plan?
- What procedure is in place for having that person regularly reporting and updating the County?

3. The proposal fails to address integration with local garbage and recycling management as well as how to handle impacts from increased garbage and emissions.

- How are you partnering with Valley County and local garbage management entities?

- How will you interface with Valley County recycling?
- What agency will Valley County have in participating in on-going evaluation and review?
- In your emissions estimates did you include the emissions from hauling community and industrial hazardous waste and garbage?

4. The proposal contains no specifics about the Hazardous Materials Handling and Emergency Response Plan.

- What kind of County oversight will there be of all safety measures relating to hazardous waste transportation, handling, storage, and spills?
- How will the specifics of the Hazardous Materials Handling and Emergency Response be made public in the EIS?
- How do you plan to coordinate hazardous materials emergencies with the Counties on your route?
- Have you met with the County Commissioners who would be impacted?
- What were the results of these discussions?
- What state and federal regulations will you use to ensure worker safety?
- What procedures have you put in place to protect human health, clean water, healthy soil, and breathable air at the worksite?

Here are my concerns and questions regarding 3.18.3.3.4 (Sanitary and Solid Waste) in Stibnite Gold Project DEIS:

- Where will the sewage go from the project and housing sites?
- How will it be handled?
- What is a "packaged sewage treatment facility"?
- Where are the leach fields located?
- As stated Midas Gold has an agreement with Valley County to recycle; how will recycling be accomplished at the project site and housing area?
- How will recycling be managed?
- How will 500 employees be educated about Valley County recycling rules and regulations?
- What person unaffiliated with Stibnite will supervise recycling and oversee the recycling?
- What procedure is in place for that person reporting regularly to the County?
- In order to uphold Midas' promise to keep recyclables out of our landfills, what are the plans for a supervised recycling site at the project area and the housing area?
- What are the state and County garbage management regulations?
- How will you inform the public that you are following these regulations?
- Where is the existing document in which Midas states its commitment to recycling?