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Organization:

Title:

Comments: My name is Jon Kittell and I live in Riggins Idaho. My wife and I became full time members of the Riggins community 4 years ago when we bought a house in downtown. We own and operate three small businesses out of our home that are directly tied to the travel and recreation industry of Riggins. In addition to our businesses I work as drift boat steelhead and bass fishing guide on the Salmon River.

I am very interested in this project, its directions and possible future impacts on not only the place I play also on the the safety and sustainability of my home and businesses. As stated in the DEIS the tourism and recreation based economies in Riggins and the small communities surrounding us are crucial to the survival of our towns. However in the recreation section (section 3.19) there is no information given on the possible impacts of the mine on these necessary local recreation economies. I would like to see an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

In addition to a leak or breach in the holding or processing facility/reservoirs I am concerned with one of the tankers carrying toxic chemicals tipping over anywhere along their route to get the mine. As the watershed itself is very remote, rocky, steep and in general difficult to navigate in any road established through will be difficult and dangerous to drive. If an accident occurred anywhere along the route clean-up action could be very difficult and in many cases not be possible at all. These chemicals would then leach into the water system, damaging it to possibly unreparable states. The DEIS grossly underestimates the accident risk on backcountry roads. The DEIS contains no analysis of the effects of a spill and no plan to clean up a spill. The spill risk modeling, spill probabilities, and # of potential spills in the DEIS (Chapter 4.12.2.3.2.1) is 2 orders of magnitude less than that calculated by statistician Lubetkin pers comm 9/2/20.

There is also a lack of analysis on the potential impacts of the downriver communities if a toxic spill or leak were to occur. If a toxic spill were to occur the effects could be devastating on the summer rafting and tour operators, the fall and winter fishing guides and operators as well as on all Idahoans and Americans who travel to this place to recreate. Nothing is listed in the DEIS that addresses the full downriver impact to recreation and the tourism based economies of the downriver communities.

In addition to not addressing the economies of the downriver communities the safety of them is also not addressed. Possible transportation routes of toxic chemicals and explosives include passing directly through the town of Riggins (and several others along the Salmon River). The DEIS does not address the possible safety issues associated with this transportation (vehicle crash, tipping over into the river, tipping over onto the highway/in town, etc.).

The full possible impacts of this mine and its operations on the town of Riggins (and other downriver communities) has not been addressed.

I feel that the DEIS did not complete its required job of looking into a full analysis of this project and all of its possible impacts. I ask that the issues listed above be fully analyzed before releasing the EIS.

Thank you for your time, effort and consideration.

Thank you

Jon