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First name: Joe
Last name: Lambiotte
Organization:
Title:
Comments: Dear Supervisor Jackson,
My name is Joe Lambiotte and I appreciate the opportunity to provide comments on the Stibnite Gold Project Draft Environmental Impact Statement (DEIS). I live in Maryland where I work as a Systems Engineer and get an opportunity to comment on a lot of documents in that role, but this is the first time making comments on a document anything like this.
My connection to Idaho started over 25 years ago when I first visited. Since then I have returned dozens of times for fishing, camping, hiking, biking, backpacking and skiing. I have spent a lot of time in Idaho including living for a brief period in Lowman, and my son was even born in Boise. About six years ago I took up whitewater kayaking with the primary objective being taking multi-day trips in the Idaho backcountry. Since then I have been lucky enough to take trips on the Main Salmon, Snake, Selway, and several other rivers in Idaho. This fall I did my first trip on the South Fork of the Salmon River and it was an incredible experience. The pristine landscape paired with world-class whitewater made it one of the best experiences I've had.
My grandfather was a miner and I have an appreciation for the importance of mining. However, I have also spent a lot of time over the past few years on rivers in Pennsylvania and West Virginia and I have seen how devastating the impacts of mining can be to the rivers and surrounding areas, lasting for decades and decades after a mine is closed. There are still rivers in these areas with bottoms stained bright orange and containing water with the strong smell and taste of iron from mine runoff.
My specific comments on the document are provided below. I did not become aware of this comment period until very recently, so I was not able to provide a full and through review (and my first comment speaks to this), but I hope they are helpful in an effective Final EIS (FEIS). Additionally, the structure of the DEIS consists of a large number of electronic documents that made it difficult to search thoroughly for key words. My comments were based on what I was able to find in the limited time I had for review.
The wilderness that Idaho contains has a very high value to me, the residents of Idaho, and most of those who come, and will come, to visit Idaho. I believe it is vital to have an FEIS that provides complete comprehensive coverage of the impacts and alternatives so decision makers, and those advising decision makers, are equipped with what they need to make such an important decision
Specific comments:
1. The comment review period should be further extended. The DEIS comment period is likely common knowledge in the local area in Idaho, but it does not appear to be well known where I live in Maryland yet even as we approach the end of the period (I only became aware of the comment period because of my recent trip). I would assume the same may be true in other parts of the country. Perhaps this is in part due to the current Covid-19 pandemic greatly reducing travel and socialization, which might more typically have helped spread the word. This project is significant and has stakeholders throughout the country who deserve the opportunity to comment. I would also suggest announcing any further comment period extension in a way that might reach further. Perhaps newspapers announcements in more major cities or by some other means.
2. The DEIS indicates there may be as many as 500 mine workers housed at the mine site. The full number of increased population at the mine site and surrounding area should be assessed including multiple rotations, families, and non-mine workers that move to the area to support mine worker demand (i.e. restaurant, bar, grocery store workers).
3. The DEIS has no details of the plans for sanitary waste management for the 500 person workforce at the mine site. There should also be an environmental assessment based on the details of this plan once added. The plan should also consider ingress/egress roads to the mine site with such a large number of workers required to travel potentially three plus hours each way even in good weather. This part of the assessment should include the overall population increase and not just mine workforce.
4. The solid waste management section does not provide an overall estimate of waste that will be produced over the life of the project nor an estimate of the breakdown of each type of waste cited. This should be provided

along with an environmental impact assessment of the different methods of waste disposal proposed.
5. The mine workforce and associated additional overall population increase will likely be recreating in the area surrounding the mine site and ingress/egress roads. There should be an environmental impact assessment of the increased recreation that also considers that these users may have recreation interests that differ from users that are typically drawn to the area specifically for recreation.
6. There is no assessment of change in risk of wildfire starting near the mine site, ingress/egress roads, or power line routes as a result of the mine project. With a the addition of a large workforce living and traveling to the mine site, mining related activities, and additions to power infrastructure, it would appear there is potential for the likelihood of wildfire ignition to change. An assessment of this likelihood and consequences should be included.
7. Of the five alternatives assessed, four of the alternatives appear to be very similar and the other is a "no-action" alternative. To provide an effective FEIS, the environmental impact of a more diverse set of alternatives should be assessed. Two examples of additional mining project alternatives could be an underground-only project or an extended-timeline project. Underground mining is part of the first four alternatives, but not clear if it was considered without surface mining. Differing timelines were noted as being considered and determined as not economically viable, but no detail or rational for this determination was provided. Without providing this detail and rational, the statement of this determination does not have the credibility needed to be included in the FEIS. A third example of an additional alternative could include an option that includes further reclamation of the existing mine site without a new mining project from funding not associated with mining. This would provide a much more complete assessment of possible environmental impacts at the Stibnite Mine and surrounding area.
8. I did not see an assessment of the change in risk to the environment from off-nominal conditions due to the mine project. Potential off-nominal conditions include accidents, flooding events, and wildfires. In particular, the area seems to have a potential for rain-on-snow flood events and floods appear to be part of the area history. These off-nominal conditions should be thoroughly assessed in the FEIS. In particular, a flood event impact related to the tailings retention facilities should be provided.
9. It is not clear that an assessment was done of the impact of mercury released into the watershed and entering the food chain that extends downstream well beyond the local area. This assessment should be added if it is missing.
10. It is not clear who authored this DEIS or the source of funding for the work that went into generating the document. The process and extent of review that was done by the various government agencies prior to the DEIS release is also unclear. Adding statements that provide the reader a clear understanding of these authoring and review should be added to the FEIS.
Eventually, the decision to permit the mine project or not will come down to a trade of various uses of federal lands including environmental/wildlife preservation, recreation, and benefits and impacts of mining. Existing laws appear to conflict making the path forward one that is not predefined and open to subjective interpretations. Having all the information available to make the decisions to permit, not permit, or create a compromise is critical.
Thank you for doing this important work and consideration of my comments.
Sincerely,
Joe Lambiotte