Data Submitted (UTC 11): 10/12/2024 9:54:31 PM
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The Stibnite Gold Project (SGP) Environmental Impact Statement (EIS) is incomplete and misleading. As such, the project must be rejected because of the noise that will be created due heavy truck travel on Warm Lake Road during the construction, operations, and reclamation phases.
While at first glance the EIS does discuss noise created by these phases, the EIS only measures and predicts noise impacts at Warm Lake from construction of the Burnt Log access road (some 10 miles from Warm Lake) and noise from operations at the mine itself (some 30 miles from Warm Lake). This absence of information about the impact of highway noise makes this EIS incomplete.
Section 3 of the EIS is titled "Affected Environment". It describes the existing natural and human environment that would potentially be affected by the "SGP Area" which "is defined to mean the entire area in which disturbance from the SGP components (i.e., the combined disturbance footprints of the mine site, access roads, utilities, and offsite facilities) ". Figure 3.6-1 provides a map showing that this area includes all areas within a five mile radius of the "SGP Area". Warm Lake and areas surrounding the lake are included. And yet, no measurement or prediction of noise disturbance from heavy truck travel on Warm Lake Road is included.

Section 3.6 describes the existing environment as is relates to noise. In this section it describes the geographic locations of "noise-sensitive receptors" (NSR) used to measure baseline ambient noise at each of 12 locations. Site 6 is Located on the southwest shoreline of Warm Lake (see map attached) to characterize baseline ambient noise levels for recreation areas associated within Warm Lake. The ambient baseline noise for this site was 34-49 decibels measured over a 24 hour period over the course of several consecutive days in July/August of either 2014 or 2016 (the EIS is not clear on which year).

Having spent hundreds of days and nights at Warm Lake, I can attest to the fact that most of the time, the area is free of all sounds other than natural sounds (wind, birds, etc). This is markedly different on Saturday from 11:00 am until 6:00 pm when weekend visitors enjoy motorized water sports during boating hours in July and August. So, it is imperative to know what days of the week the SGP measured the baseline ambient noise at Warm Lake. If it was measured over a weekend, that measurement is not representative of the average day. An average day would include weekdays in other months like October, November, April and May. Warm Lake is an incredibly quiet area. That quiet will be destroyed by heavy truck travel.

The Noise Control Act of 1972 established a national policy to promote an environment free from noise that jeopardizes public health or welfare. It defined a standard of day-night noise level less than or equal to 55 dBA for areas where people spend varying amounts of time, where quiet is a basis for the use of such areas. That is a major reason people visit the Warm Lake Area, to experience quiet.

In section 3.18 the EIS concludes that noise disturbances along truck routes may create a negative health impact due to psychological impacts of noise. But it is not measured or predicted as required in Section 4.

Section 3 describes what is at stake. But the misleading and incomplete information is contained in Section 4 which describes the Environmental Consequences of the Stibnite Gold Project.

Section 4.6 deals with the consequences of noise. It is worth noting that in Section 4, the word "noise" comes up 1,346 times. That alone should alert the reader of the EIS to the impact that SGP noise will have on the environment.

The discussion on the increase in the noise due to the SGP construction, operations and reclamation stages

makes NO MENTION of the impact of noise due to heavy trucks traveling up and down Warm Lake Road and Warm Lake Summit.

In Section 4.16.2.1.4 "Safety and Emergency Access" the EIS proposes that in order to mitigate the unsafe use of heavy trucks on Warm Lake Road, "driver training (e.g., use of truck compression brakes on steep sections ….. and familiarity with the travel routes including locations of steep slopes that require downshifting)". Yet the EIS fails to provide information on the increase and duration of noise produced by this action. Compression braking of heavy trucks commonly produces upwards of 96 decibels of sound. Some truck drivers refuse to use muffling equipment. If you want evidence of the disruption these trucks cause, do a google search on the conflict between truckers and residents along the I-70 corridor in Colorado.

On page 4.6-2 the EIS reports that it is using the 82 decibels of a diesel bus as a representation of the decibel level of a heavy truck. But a bus is not a semi-truck. A bus carries people and as such people would not ride a bus that is more than 82 decibels. Harm from noise increases exponentially. Thus using 82 decibels as a measurement of the decibel level from a semi-truck is wildly misreprentative. The EIS should include the actual decibel level produced by a semi-truck as it travels on flat sections of roads as well as when it is downshifting or using compression brakes on steep grades like Warm Lake Summit.
Section 4.6 "Environmental Consequences", is incredibly misleading and incomplete when it discusses the impact of noise at Warm Lake.

The EIS reports the increase of decibels on the Noise-Sensitive Receiver (NSR) located at the southwest side of Warm Lake (site 6). The EIS summarizes that there would be "no impact on the noise environment of Site 6 during the construction phase." However, the EIS describes only the noise increase due to the construction of the new Burnt Log road (over 10 miles away). They specifically do not measure the sound of a heavy trucks traveling to and from that road construction site along Warm Lake Road. This is misleading and useless information.

Likewise, the EIS reports the increase in noise at NSR Site 6 (Warm Lake) from operations at the mine site itself (over 30 miles away). It summarizes that "Average hourly noise from all SGP-related activities combined, both without and with blasting, would attenuate to 0 dBA at Site 6 during the operations phase, and would have no effect on background ambient noise levels." They specifically do not measure the sound of a heavy trucks traveling to and from that mine site along Warm Lake Road. This is misleading and useless information.

The information about the noise impact from heavy truck travel along Warm Lake Road is knowable. Yet the EIS fails to report this information. In addition the EIS confuses the reader with useless information about the noise created at NSR Site 6 from activities that are extremely far away. This seems disingenuous at best and intentionally misleading at worst.

Furthermore, there is an Historic District at Warm Lake that includes cabins and lodges built nearly 100 years ago. Historic districts are impacted by noise and require study prior to the approval of any noise producing projects. In fact Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve throughout the country. If a federal or federally-assisted project has the potential to affect historic properties, a Section 106 review must take place which includes "audible elements that diminish the integrity of the property's significant historic features". This requirement, imposed at the federal level, has not been met by this EIS.
Even with disregard to the federal requirements for inclusion of noise impact on historic districts, there is a duty to the individuals who own and protect historic property. In Protect Niles v. City of Fremont, 25 Cal. App. 5th 1129 (2018), a California appellate court found that residents of a historic overlay district had the right to an environmental impact statement that regarded the impact of traffic noise created for a new development proposed near the historic district.

Federal law requires that an EIS include:
1.description of the action, including its need and benefits;
2.description of the environmental setting and areas to be affected;
3.an analysis of all environmental impacts related to the action;
4.an analysis of reasonable alternatives to the action;
5.identification of ways to reduce or avoid adverse environmental impacts.

The Stibnite Gold Project EIS does not meet these standards. The project must be rejected. They must provide measurements of the noise along Warm Lake Road created by heavy trucks, at actual real-life decibel levels, traveling on flat and steep grades, using downshifting and compression brakes. The EIS must discuss reasonable alternatives to the noise created by these heavy trucks as well as identifying ways to reduce or avoid these impacts (such as using smaller trucks, requiring muffling systems, convoying truck traffic so as to reduce the number of times the environment is impacted by noise, using a different route, like the Salmon River Road or Lick Creek Road for some of the traffic and so forth).

The thousands of recreationists who use Warm Lake deserve to be provided with a complete EIS that includes a study of the impact of noise due to heavy truck travel on Warm Lake Road. Without this information the EIS is incomplete and the project must be rejected.