

Data Submitted (UTC 11): 10/28/2020 6:00:00 AM

First name: Bruce

Last name: Rankin

Organization:

Title:

Comments: These comments on the Stibnite Gold Project (SGP) Draft Environmental Impact Statement (DEIS) of 8/14/2020 are submitted by Bruce Rankin, a resident of McCall, ID / Valley County, ID. I retired from Boise Fire Department, having served 25 years in the Operations Division with positions of Firefighter, Senior Firefighter (Driver), Captain, Battalion Chief, and Operations Division Chief. As DC OPS, responsibility included supervision of specialty teams; Dive, Technical Rescue, and Hazardous Materials. I was a Type 3 Planning Section Chief for Boise's Incident Management Team.

To begin, I ask that the comment period, which expires on 10/28/2020, be extended through 12/15/2020 which would allow for a 120 day response to a large, fractured and confusing document.

My concern is wide-spread with SGP's project and the SGP's effect on the health and well-being of an environment intended to support animals, plants, fish, and where people live and recreate. Due to the vast subject matter of this DEIS, my commentary focuses on the practical aspects of emergency response to human-caused impacts. For accident and emergency response, this DEIS document focuses on a geographic area North of Warm Lake Road to and including the SGP footprint. There is significant potential for emergency response to SGP-generated incidents over many miles of roadway outside SGP's operational footprint. This issue needs to be addressed with the general population, emergency response entities and governing bodies for a full understanding of potential impact and cost of incidents. I urge the FS to accept alternative 5.

Appendix D [ndash] Mitigation Measures [ndash] FS-19 Idaho State Police could likely provide evidence of a significant lack of compliance with DOT-mandated vehicle safety and operational measures. How will SGP ensure that contracted commercial carrier operators will actually complete and document valid vehicle inspections?

Appendix D [ndash] Mitigation Measures [ndash] FS-21 What type of emergency response training will SGP staff receive and who will provide the training? What is the plan for recurring training?

Appendix D [ndash] Mitigation Measures [ndash] FS-23 What type of kit (purpose specific?) and who will have responsibility for upkeep?

Appendix D [ndash] Mitigation Measures [ndash] FS-26 Who will develop a site-wide health & safety plan? How and when will all employees receive familiarization with the plan? What is SGP's definition of familiarization?

Appendix D [ndash] Mitigation Measures [ndash] FS-57 Concerning non-native and noxious weeds, what type of eradication (mechanical, chemical, etc) method(s) are planned? How do you plan to manage to prevent seed production?

Appendix D [ndash] Mitigation Measures [ndash] FS-59, FS-61, FS-69 How will SGP mitigate non-native and noxious seeds from wash sites? What type of training will personnel assigned to application of chemicals receive? Has SGP done a thorough inventory of non-native and noxious weeds within the operational footprint? Has SGP identified what type of chemical application may be needed for each species? How will you manage application processes?

Appendix D [ndash] Mitigation Measures [ndash] FS-75 It has been made abundantly clear (Covid mask use) that encouraging and requesting means nothing to a significant number of people. How will SGP ensure that

vehicle-wildlife accidents and dust-producing driving speeds be effectively managed for the near elimination of both? How will SGP decide when conditions are such that pilot cars will be utilized?

Appendix D [ndash] Mitigation Measures [ndash] FS-84 The HazMat first responder training is designed to offer an awareness of what may constitute a HazMat incident. An incident response would be requested by the first responder. What organization(s) is the SGP planning to utilize for a HazMat response?

Appendix D [ndash] Mitigation Measures [ndash] FS-85 In a potential IDLH setting, a minimum of 4 OPS-level trained personnel are required.

Appendix D [ndash] Mitigation Measures [ndash] FS-88 SGP[rsquo]s assumption with their DEIS language regarding containment equipment would be for a relatively small (<50 gal) amount of hazardous material. I doubt they are planning to transport only one 55 gal quantity of product per shipment.

Appendix D [ndash] Mitigation Measures [ndash] FS-89 The scenario SGP provides assumes a minor spill. A high-impact or rollover accident involving more than a few sealed 55-gal barrels is a major HM incident and a response capable of mitigation is likely beyond the capabilities of a SGP response team. What resource(s) is SGP planning on using for major incidents?