

Public Hearing: June 5, 2019

2020 - 2019 Oneida County Land & Water Resource Management Plan [DRAFT]

Testimony of Dave Noel, Sugar Camp

My name is Dave Noel. I live in Sugar Camp at 7279 Saari Pt Dr. I am a retired engineer. I am here to comment on the April 2019 draft of the *2020 – 2029 Oneida County Land & Water Resource Management Plan*.

I want to thank the Resource Advisory Group and the Oneida County Land & Water Conservation Department for developing this comprehensive look at our land & water resources. I realize that it took many hours of work.

I applaud their conclusion that the primary goal of this Plan should be to Protect and Enhance Wetlands and Surface Water Quality of Oneida County.

I support their list of overall resource concerns, and want to acknowledge the inclusion and description of the impact of climate change on the natural resources of the northwoods, especially in the current political environment.

I was impressed with the comprehensive 5-year Work Plan, the associated action items, and specifically the annual measurement tools and guidelines.

However....I was disappointed in the lack of concern of the risks of metallic sulfide mining. Yes, mining was mentioned in the 5-year work plan, but the plan hardly addresses the substantial risks of metallic sulfide mining. And, I want to point out that the County's current mining ordinance will not protect the wetlands and surface waters of Oneida County from acid mine drainage from a metallic sulfide mine, so the plan to "maintain the current ordinance" is meaningless.

My recommendations:

In Chapter 3, Section A (page 9) under Overall Resource Concerns, I recommend adding a section on the risks of metallic sulfide mining, along with your existing concerns of climate change, invasive species, and insect decline.

In the 5-Year Work Plan, Goal 1, item G (page 43), I recommend the following changes where the plan currently calls for "Maintain county mining ordinance(s)":

G. County metallic mining ordinance.

1. Create a mining ordinance specific to metallic mining intended to limit environmental impacts within the county.
2. Create a metallic mining ordinance prohibiting metallic mining in County owned forest land, especially within the proposed Lynn wetlands site.
3. Hire an independent mining engineer/geologist with experience in metallic sulfide mine remediation to educate the FLRC, P&DC, and interested Board members on the true long-term impact and cost of metallic mining, especially in the proposed Lynn site.
4. Keep abreast of impacts of the metallic mining on nearby sites (such as Eagle Mine) as well as the proposed North Forty project in Michigan.

Here's why I believe these additions are important. There seems to be a belief by many that modern technology has made metallic mining safe for the environment. This is not true. Modern mining technology is instead making it easier to mine lower-grade ores, which results in larger amounts of reactive wastes requiring permanent safe disposal.

The Ladysmith mine is often showcased as a successful metallic mine that did not harm the nearby groundwater. This is not true. The Ladysmith mine pit continues to leak reactive sulfuric acid which is detected at nearby monitoring sites. But...an important point is that Ladysmith was an extremely small mine site, and therefore the copper-sulfide ore was hauled off-site for processing. There was no on-site storage of the mine tailings. Therefore this is not a representative example.

The Eagle Mine in the UP is also showcased as an example of a model metallic mine without a single environmental mishap. Wrong again. The State of Michigan advises that the mine has exceeded wastewater chronic toxicity limits multiple times since 2017. The mine recently caused a chemical spill of sulfuric acid at the processing plant.

My point here is that there has never been a successful, environmentally safe metallic sulfide mine operation in the US. Never. Metallic sulfide mining represents a clear and present danger to our wetlands and surface water, and because of this it deserves more attention in this natural resource management plan.

Thank you for allowing me to comment.

I would like to formally request
an additional CUW Meeting so that I
can work w/ Fred on public comment.