Midas Gold Project Scoping

As a home owner located a few miles east of Cascade, Idaho and with the 69KV line corridor passing through the center of my two properties, my family and I have some questions and concerns relating to the proposed Midas Gold gold mining project at Stibnite. As a former principal mine geologist and lead exploration geologist at Stibnite with Pioneer Metals Corporation in the mid 1980’s, I am quite familiar with its prior mining activity, the geology of the ore deposits and surroundings, and the environmental conditions at the site. As a former miner at Stibnite myself, I am not against mining in general. However I do have some questions of concern that are listed below:

1. What type of modifications will be required to increase the 69-kv line to the 138-kv line as proposed in your plan? The proposed enormous increase in power demand of 40 to 50 megawatts is about **half of Idaho Power’s current peak power usage for the entire west-central Idaho system (105 MW)**, including McCall, Donnelly, Cascade, Council, and other communities and adjacent regions. One specific concern the project needs to address is how the property owners will be impacted as to adverse health effects that the much increased EMF field generated, which past and recent studies show an increased rate of leukemia, especially in children living within 600 meters (19,700 feet) of high voltage transmission lines. My house is within 12 meters (40 feet) of the existing line. Other homes are very close as well. **Recent controlled studies show a 69% increase in leukemia rates in children living within 200 meters (Vincent, Kroll, et al., BMJ 2005:330:1290 and Copes and Barnes, BC Medical Journal, Vol. 50, No.9). How will Midas Gold mitigate this potential public health hazard?** Secondly, will adverse noise or hum be generated in close proximity to this powerline? Lastly, will the **style, height, footprint, and number of poles change or will the size and number of existing wires change** which would impact property use and appearance that lowers the value of these rural recreational homes and permanent residences? **If so, how will the owners be compensated?**

2. The proposed operation projects that up to a 1,000 people may be working on the site. How will that increased level of traffic be accommodated on the Warm Lake and Burnt Log road as specified in the proposed project? Does the Burnt Log road currently access the mine site or would new sections of road need to be built or realigned? How many acreas would be disturbed for the road corridor in addition to the 1500 acreas of public land impacted by the mine. How wide would it need to be constructed and are current grades acceptable along the route? The proposed route closely follows the Frank Church wilderness boundary, so would the view shed be protected from the road and its traffic? How will wildlife be impacted from the increased road traffic with large trucks and mining equipment? Will sediment loads increase during road construction, at stream crossings, and from protracted erosion of a much larger road surface and cut and fill areas, potentially degrading salmon and other aquatic habitat? How will wildlife, especially such as the threatened Lynx, be protected from increased traffic. Also, will the recreational qualities of the region and public safety be negatively impacted on and about the Warm Lake Road, South Fork Road, or along Johnson Creek due to the much larger traffic volume and increase use of large trucks?

3. Has there been, and will there be, routine periodic monitoring of potential contaminants in surface water, springs, and ground water so as to establish baseline data **prior** to and during mining operations, at both up-gradient and down-gradient locations from the project? Will surface and ground water monitoring continue after mine reclamation, including downstream on the EFSF Salmon and down hydraulic gradient of the mine claims to insure detection and mitigation of contaminants that may impact aquatic life, wildlife, and the community of Yellow Pine? Will monitoring include **mercury** and **lead** along with **antimony** and **arsenic** or other metals? Will water quality monitoring also include TDS, pH, temperature, phosphates, nitrates, and coliform since Stibnite will serve as a public drinking water system and potential source for these constituent parameters? How long after mine closure will surface and ground water monitoring continue to ensure no offsite migration of a contaminant plume after closure and reclamation?

4. Will backfilling the existing Yellow Pine Pit with waste rock be covered with an impermeable cap so as to prevent infiltration and leachate formation that could generate increased levels of ground water leachate? Although open-pit mine water is a current source of ground water contamination, the existing pond has the benefit of evaporation. Back-filled waste rock also will increase rock surface area and soluble contaminants in a permeable medium, thereby increasing potential for ground water leachate production, as well as preventing evaporative losses. Backfilling the pit is a good plan only if the design prevents surface water run-on, run-off is designed to prevent surface ponding and erosion, and an impermeable cover placed after backfilling to avoid infiltration of surface waters.

5. The project, as proposed, shows a mine tailings dam about 450 feet high and will ultimately impound 98 million tons of tailings. This is a major dam, the largest dam category according to State of Idaho Code governing dam regulations. Presumably the failure of a dam of this size would have a direct and profound impact to the downstream community of Yellow Pine. If so, this places the proposed dam in the ***high risk category*** according to Idaho dam regulations. Will the dam meet Idaho and Federal dam safety regulations in its siting, foundation analysis, structural design, materials and construction quality control and testing, and possibility of a public warning system to downstream residences and businesses? Since it is in a seismically active zone (Intermountain Seismic Belt), will the dam’s design withstand, by an appropriate factor of safety, the ground accelerations of the maximum credible earthquake?

 6. For how long will a post reclamation bond be afforded to insure **long term protection** from **contaminant leakage, dam failure, and/or tailings and impoundment erosion and sediment control** downstream in the EFSF Salmon River based on the high annual precipitation rate of this area? Considering Stibnite has already experienced a previous mine dam failure at almost this same location as the proposed much larger dam (Blowout Creek), which to this day still causes sediment problems, how will water management be maintained after closure and virtually into perpetuity behind the impoundment during high snow years and large storm events?

Lastly, I have many other concerns about a mining operation of this magnitude at this site, but Stibnite has been mined for a long time and problems persist which a new operation can help solve. Midas Gold proposes to mitigate some of these problems in the course of its operation. So I’m not opposed to renewed mining at Stibnite, the economic benefits and new jobs are a very positive benefit to the region. Yet, the scale of the project as proposed should give one pause for extra consideration for the lasting consequences and their extent it may have on the environment, on the lifestyle of many of its residences and recreationists alike. If scaled back to appropriately fit in with the needs of this remote and beautiful area, it seems to me to be perfectly suited for another mining venture. Thank you for the opportunity to express my concerns and hope they will be fully addressed in the EIS and final operating plan.