**Comments on Midas Gold Stibnite Gold Project Draft Environmental Impact Statement.**

I would like to offer these comments regarding the Midas’ SGP. First due to the size of the document and the limited amount time to read and understand the DEIS I am limiting my comments to the water treatment plan.

The main issue of developing a mine in the headwater of Idaho’s Salmon River is water quality. The Salmon River, and all the tributaries, constitute the longest free flowing river in the United States outside of Alaska. The high quality of water in Salmon River provides essential habitat for ESA listed salmon and steelhead.

After reviewing the Stibnite Gold Project DEIS, I have several concerns regarding the water treatment plan, or lack thereof, for the SGP.

1. The water treatment system is not clearly defined (page 2-54). For a project with the scope of the SGP it is imperative that the water treatment system be clearly defined to ensure the water treatment methodology is sufficient to meet all of the water treatment requirements both while the SGP is operating and during reclamation.
2. Both water treatment methods mentioned (page 2-54), iron coprecipitation and reverse osmosis, are highly expensive and require trained personnel to operate treatment systems. If water treatment is necessary into perpetuity, which is highly probable, who will be responsible for bearing the cost and operating the water treatment systems after mine operations have ceased. Could the SGP become another environmental and economic disaster like the Summitville Mine in Colorado?
3. The geochemical modeling done for the SGP is nowhere enough to predict how water quality will be impacted mining operations. A model is just that a model. A tool to hopefully predict future water quality. There is no guarantee that the water quality during mining operations or post-mining will be any better than it is now, in fact is could be worse, much worse. I don’t feel that we can risk the water quality in the Salmon River drainage to a model.
4. The SGP is located high in the mountains of central Idaho. This area will receive enormous amount of snowpack. During these high snowpack years spring runoff can huge. I don’t see any conditions in the current water treatment plan on how to deal with large amounts of runoff that will most definitely impact whatever water treatment systems are in place and ultimately the water quality of the planned discharge to the East Fork of the South Fork of the Salmon River.

Midas Gold is pitching to the public that they plan to develop a “environmentally friendly” mine. Quite frankly that is impossible. There will be environmental impacts, particularly to water quality, that could last into perpetuity. Are we willing to take that risk with Idaho’s Salmon River drainage? I don’t think so.

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