

The Stibnite Gold Project Draft EIS is incomplete and inadequate. I recommend option #5, do not proceed further until these inadequacies and omissions are addressed.

I am especially concerned about the complete lack of analysis of impacts specific to the Warm Lake area. Warm Lake is not immediately adjacent to the Stibnite mine, however, it is within the SGP affected area, as identified in Section 3 as well as Figure 3.6-1.

Due to the constricted canyon and topography between Landmark Summit and Warm Lake, any accidents occurring from travel by heavy Midas Gold vehicles carrying toxic materials down Warm Lake Road, would all wash into Warm Lake Creek and flow into Warm Lake itself.

According to Article 3 & Article 4.7: Eight accidents per year are predicted on the Section of Warm Lake Road between Warm Lake and Landmark, if this route is selected. This alternative results in the most accidents of all options. Multiplied this by 20+ years of operations is 160 predicted accidents. Some portion of those accidents will dump hazardous chemicals and waste, which will by default end up in the creek feeding Warm Lake. Page 4.7 – 11 states “if surface or ground water were to be impacted with fuels or other hazardous materials, the potential for migration beyond the local area could occur.” I believe this statement is in fact a gross understatement. No environmental analysis, monitoring, nor mitigation measures for these accidents and their impact on Warm Lake are identified in this DEIS. This a material omission of significant enough scale to require revision to the DEIS document.

Why isn't Lick Creek Road an option? It is a straighter, shorter and less hazardous road, thus would generate fewer accidents, spills and damage to the environment. One assumes it is because it traverses alongside the sensitive Salmon River, of course. However, I would ask, if it is too damaging to the environment to travel a safer, shorter route, how can we expect it to not be damaging to the environment and watershed feeding into Warm Lake, also a sensitive area.

Additionally, only spill-related accidents closer to the mine are included in this DEIS at all. With hundreds of thousands of truck trips over the life of the mine, vehicle accident calculations should also be analyzed along the Highway 55 corridor. This winding highway has extremely limited passing ability and this additional traffic will negatively impact public travel safety exponentially. Attempts to pass slow trucks will result in collisions with passenger vehicles, and deaths. No analysis or mitigations are proposed for co-mingling with heavy passenger traffic.

DEIS 4.6-2 lightly discusses noise but uses limited information and faulty averages and comparisons which serve to minimize this significant issue. It seems as though this data was provided by Midas themselves, in an attempt to mask and redirect the true scope of this problem. The DEIS needs to include actual measurements of the

specific vehicles traveling and braking on steep roads such as Warm Lake Road. This is an area where the noise will greatly impact the public experience. Additionally, the baseline measurements (Section 3.6) nearest Warm Lake do not provide adequate information for comparison. Warm Lake is known as an incredibly quiet environment, although it does have an active power boating population primarily on summer weekends, only from 11-6, however the vast majority of time it is incredibly quiet and peaceful. Noise from constant Midas Gold trucks would completely eliminate those quiet periods.

Where is the analysis of the impact to the roads. Warm Lake Highway (and beyond) can not support this level of heavy vehicle traffic year after year without serious degradation and damage to the road bed. Will the taxpayers be left to repair this additional damage from Midas Gold? Please provide analysis of the impact, plan and cost to address the road damage.

An EIS is required to analyze ALL environmental impacts related to the activity, alternatives, and identification of mitigating actions to reduce or remedy any adverse impacts. This DEIS is completely insufficient and incomplete without addressing the multiple issues related to the Warm Lake area and population. For this reason, option 5 needs to be selected.

Respectfully,  
Karen Drake