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

First name: Ken Last name: Roberts Organization:

Title:

Comments: Dating back to World War 11, Meadow Creek's waters have been passing over about 10.5 million tons of tailings and spent ore from previous mining operations and flowing into the East Fork of the South Fork of the Salmon River (EFSFSR).

Midas Gold Idaho has been monitoring the site's water quality for the last decade and has found very high arsenic and antimony levels, over 700 times higher than the drinking water standard in some locations. This is likely the result of the roughly 3 million tons of legacy tailings and 7 million tons of spent ore deposits that have been left unattended for decades. The longer the water flows over these materials, the more metal leaches into the surface and groundwater rendering the water unsafe for drinking.

Removing these legacy materials could rejuvenate the area's water quality both for public consumption and supporting aquatic life. Alternative 2 plans to clean up, reprocess, and properly store the tailings in a new, state-of-the-art tailings facility. Better yet, Midas Gold would also permanently separate the spent ore from interacting with the EFSFSR by relocating it under the new tailings facility liner. According to your department's draft Environmental Impact Statement, these actions will help restore the water's standards. Stated in Chapter 4, removing legacy tailings and waste lowers concentrations of antimony and arsenic in the East Fork South Fork of the Salmon River (4.9-70).

Unlike other options, Alternative 2 also includes provisions to minimize its own environmental footprint. While Alternative 2's tailings storage facility will be located in an area already impacted by past mining, Alternative 3 plans to place its tailings storage facility in a pristine part of the Salmon River. Furthermore, Alternative 2's facility will be more safely situated away from geological hazards and occupy roughly 100 less acres of land than Alternative 3.

Please approve Alternative 2 as proposed by Midas Gold and reviewed by the draft Environmental Impact Statement because it is the best option for restoring the Stibn ite -Ye llow Pine region's w~ter quality.