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Organization:

Title:

Comments: Hello Linda and Victoria,

I am writing to you to state my serious concerns in regards to Midas Gold and their proposed Stibnite Gold Project. I am currently the Environmental Science Teacher, and Program Director of World Class Academy - A high school based in kayaking, and focused on using natural areas of the World as our classrooms. This past Fall, we explored various sections of the Salmon River Drainage and whilst on our river trip; students studied geologic formations, fish migration and the necessity of entire ecosystems to have access to clean water. Witnessing the engagement of students within the canyon walls as they pursued this knowledge was humbling, and it is heartbreaking to think future classes might be denied the same opportunity to explore a clean, free-flowing Salmon River. On the Surface, I am an educator and a mentor to the next generation, but I am also a passionate whitewater kayaker and outdoor enthusiast. These are the roots I pull on when I read the DEIS and see the flaws or faults it contains. The effects analysis in the DEIS focuses on predictive numerical modelling. In an attempt to quantify changes to water quality and quantity at different times during the mining operation and up to one hundred years in the future, the DEIS relies on certain assumptions that contain significant errors. This error is primarily based on the methodology employed to analyze uncertainty in the model outputs. Chemical reactions between rock and water have the potential to release acid and toxic metal ions into groundwater and surface water. Groundwater quality and quantity will be adversely impacted by the project. These impacts will then affect surface water which in turn affects aquatic organisms. Groundwater and surface water have many interactions and should be thought of as two parts of a single integrated system, the primary distinction between the two is the time scales of their respective processes. Modelling in the DEIS shows that arsenic, antimony, mercury, and other metals will contaminate water for many years after mine closure. Keep in mind this detrimental prediction likely represents an abest-case scenario.

For example, the faults and fracture zones present in the area are acknowledged as having a potentially significant influence on groundwater movement and quality. However, they are not taken into account in the modelling. This omission is identified in Chapter 4.8.8.2.1.3. Further, the plan to treat surface water in perpetuity to meet state water quality standards relies on an assumption that whatever company mines the site will put money into a trust fund to support the operational costs to treat the water forever. The infrastructure to do so (powerline, roads, treatment facilities) will remain forever. However, the contamination is modelled to still require treatment 100 years in the future. The DEIS assumes, without support that chemical reactions causing contamination will slowly decrease to a point where contaminants will be below state standards. When this time comes is unknowable. Moreover, state water quality standards have equal chances of becoming more strict in the future as remaining the same. For the reasons outlined above and the serious threat this project lies as to a clean, and free-flowing salmon river; I would strongly advocate for alternative #5. I plead that no action be taken in the commencement of this project without a supplemental, and substantially more thorough DEIS being completed.

Thank you for taking the necessary time to read through, and understand the importance of my comments.