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Comments: Perpetua's current proposal makes clear that they are not able to mitigate leaching arsenic into the pristine waters in the area or safely transport highly concentrated toxic antimony.

Regarding antimony:

The proposal states "The antimony concentrate would be loaded into 2-ton sealed supersacks at site and hauled on flatbed trucks to the SGLF via the Burntlog Route."

The "Burntlog Route" will connect to the road between Landmark and Warm Lake. Anyone who has driven down Landmark Hill knows the knows this road is an incredibly steep, dangerous road. Perpetua proposes to send flatbed trucks loaded with polypropylene bags full of concentrated antimony to navigate it in winter. When I researched the manufacturers' specs on these bags, nearly all of them said their maximum capacity is 2,200 pounds, so they will be filled to near capacity, and they must be carefully handled because improper stacking or being grazed by the tine of a forklift can cause the seams to burst. A single bag failing or being improperly loaded could result in 2 tons of concentrated toxic antimony spilling into the drainage that feeds Warm Lake. No matter how often Perpetua plows, sands or salts the road (which will also pollute the drainage and should be banned. See studies out of Colorado as to damage along streams caused even from sanding nearby roads), I cannot think of a more dangerous road to navigate in winter. A truck rolling and spilling its entire load seems inevitable due to thousands of trips these trucks will make. The proposal says they are employing 150 ton trucks, thus a single truck going off the road would poison Warm Lake and everything downstream for miles. The storage and transportation method proposed is clearly insufficient for this extreme and sensitive environment.

Regarding arsenic:

The following excerpt from the proposal speaks for itself. Midas acknowledges here that testing shows substantial amounts of unstable arsenic will likely leach into and taint the water supply. This is unacceptable, and their single sentence saying that long term water treatment may be necessary without expounding on how to address the issue, shows they are not able to or do not care to mitigate this pollution:

"Tailings Arsenic Management Metallurgical and geochemical testing and analyses suggested improvements in ore processing and tailings closure design to prevent arsenic from entering waterways. Metallurgical testing of the autoclave tailings from earlier process flowsheet designs confirmed that a substantial amount of amorphous (unstable) arsenic compounds formed in the pressure oxidation vessel that would result in elevated soluble arsenic in subsequent environmental testing. Additionally, environmental testing completed on representative SGP tailings solids showed some soluble arsenic in the tailings leachate. Geochemical modeling indicated that the levels may result in not meeting water quality standards in water discharging to Meadow Creek during post closure, necessitating long-term water treatment, even with the ModPRO improvements."

Thus if it can't meet water quality standards, the project should be denied.

Thank you,  
Katie Drake