

Stibnite Gold Project, DEIS

Stibnite Advisory Council

1. **Adams County**
(Board of Adams County Commissioners) Joe Iveson, Viki Purdy and Mike Paradis
2. **City of Cascade**
(Mayor) Judith Nissula
3. **City of Council**
(Mayor) Bruce Gardner
4. **City of Donnelly**
(Mayor) Susan Doris
5. **Idaho County**
(Board of Idaho County Commissioners) R. Skipper Brandt, Mark Frei and Denis Duman
6. **City of New Meadows**
(City Clerk/Treasure) Jacob M. Qualls, (Mayor) Julie Good, (Council Members) Darla Weber, Jeff Parnett, Shiloh Ryker and Darbey Edwards
7. **City of Riggins**
(Mayor) Glenna McClure
8. **Village of Yellow Pine Association**
(Chairman) Deb Filler



OFFICE OF
BOARD OF COUNTY COMMISSIONERS
ADAMS COUNTY



Joe Iveson, Chairman
Mike Paradis, Commissioner
Viki Purdy, Commissioners

Sherry Ward
Clerk of the Board
Phone: 208-253-4561

October 19, 2020

U.S. Forest Service, Payette National Forest
Attn: Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Re: Stibnite Gold Project EIS

Dear Ms. Jackson,

Thank you for this opportunity to provide our input on the Draft Environmental Impact Statement (DEIS) for the Stibnite Gold Project. We believe this major project will provide substantial benefits to the citizens of Adams County and other communities like ours in the surrounding region.

We have observed with interest the progression of the Stibnite Gold Project since Midas Gold first began communicating plans for redeveloping the Stibnite site nearly a decade ago. Since that time, we have appreciated the unique approach taken by Midas Gold to truly involve the surrounding communities in their planning and placed environmental restoration at the center of their proposed project.

The commitment to involving local community members in the development and planning of the Stibnite Gold Project became more concrete with the creation of the Stibnite Advisory Council. The Stibnite Advisory Council consists of representatives from each of the communities that entered into the community agreement with Midas Gold in 2018. Through the Council, local community members have been able to learn more about the project, request additional information from Midas Gold, voice concerns, and have their questions answered. This has fostered a deep understanding of the project and a sense of collaboration.

In our opinion, there has been a high level of transparency and accountability from Midas Gold throughout the planning stages of the Stibnite Gold Project and during the past four years of the National Environmental Policy Act (NEPA) review process since formal submission of the Plan of Restoration and Operations (PRO) in 2016. After hearing from and meeting with Midas Gold over the

past several years and reviewing the DEIS published this summer by the U.S. Forest Service, we believe the company is well-positioned to bring positive change to our region, both environmentally and economically.

In the modern world, the rigorous environmental standards that exist today under NEPA, and strict financial assurance requirements will help ensure Midas Gold completes the approved mining and restoration plan. We have observed Midas Gold consistently making every effort to work with local, state, and federal regulators; community members; and other stakeholders to ensure their plan creates new economic opportunities for rural communities like ours while at the same time ensuring environmental issues created by past operations are cleaned up to modern standards.

Adams County is looking forward to the economic benefits this project will provide for our region. From the \$1.1 billion in private investment, the Stibnite Gold Project is expected to create roughly 600-700 direct jobs during the construction phase, with annual payroll ranging from \$42 to \$49 million. During operations, the company expects to provide Idahoans with another 500-600 direct jobs, with payroll ranging from \$48 million to \$51 million. Another 950-1,400 indirect jobs would be created during both phases.

Several citizens from the City of Council within Adams County have been employed by Midas Gold and can attest to the company's values and ongoing commitment to the region. We look forward to further employment opportunities throughout the life of the project.

With our long history of resource development, particularly mining and forestry, in our region, we are familiar with both the challenges and benefits of major projects in these industries. With the Stibnite Gold Project, one major positive aspect for our county is that there will be opportunities for the younger generation to have well-paid jobs with good benefits near to their home-town, near family, and not be reliant on only part-time tourism or government jobs. This project represents some encouraging news about the potential for economic growth and revitalization within Adams County.

Additionally, the project is expected to inject hundreds of millions of dollars into our state's economy and provide significant local and state tax revenue. For a region like ours, these benefits will have a substantial positive impact on the local economy.

Finally, and as we are sure many Idahoans would agree, in addition to the economic benefits that will result from this project, Adams County approves of the extra measures proposed by Midas Gold to protect the environment and help restore habitats for local wildlife and fish populations.

For all these reasons, Adams County urges the U.S. Forest Service to adopt Alternative 2 as proposed by Midas Gold and as presented in the DEIS as well as Adams County does not support any road closures by the Forest Service or Midas Gold for this project.

Thank you for the opportunity to provide our viewpoint on this important project.

Respectfully,

Board of Adams County Commissioners

By: Joe Iveson
Joe Iveson, Commissioner

By: Viki Purdy
Viki Purdy, Commissioner

By: Mike Paradis
Mike Paradis, Commissioner



October 20, 2020

U.S. Forest Service, Payette National Forest
Attn: Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Dear Ms. Linda Jackson:

The city of Cascade, Idaho, has been somewhat involved with Midas Gold Idaho over the past decade as the company has laid the preliminary groundwork for its proposed Stibnite Gold Project. We are thankful for this opportunity to submit our comments on this project to the U.S. Forest Service.

At a population of roughly 1,000 people, our city is familiar with the benefits and challenges of natural resource work, especially as it is related to timber and mining. For generations, Cascade was built on and sustained by these industries. We have both prospered from the highs and felt the devastating impacts of the disappearance of industry jobs in our region. We have not had either industry for almost two decades; our businesses are left to the cyclical nature of a tourism based economy as our families struggle to keep the next generation anchored to Cascade.

Experience reminds us that it is important to have a voice in the process. Midas Gold has reached out and involved local communities like Cascade in their planning.

Cascade is the closest city to the Midas Gold project; a project that will have a direct impact on our residents that will be both positive and negative. This project has an opportunity to provide some much-needed economic stimulus during these uncertain times. Infrastructure of all types, including but not limited to housing that is affordable, water, sewer, and roads within the City will require a commitment in order to meet the increased demands resulting from this project. The City will look to Midas to help meet needs that our current tax base is unable to meet. In addition, growth impacts to the school, hospital and law enforcement will need to be considered.

It has been over 20 years since a major employer was located in or close to Cascade. The City has struggled to attract another entity that would be able to provide a living wage for families that reside in our city and the surrounding area.

According to estimates from Midas Gold and data reflected in the Payette Forest draft study, this project has the potential to create as many as 700 jobs during the construction phase and more than 200 local jobs throughout operations. Acknowledging that maybe half of those local

jobs would benefit existing, local residents with the other half would be moving into the area with their families. With the increase in short term rental properties, the City of Cascade has and will continue to experience a serious long term housing shortage that has already negatively impacted existing, local residents. An increase in population without a plan for more housing is a serious concern for our city. However, it is uncertain if those workers will live in a city other than Cascade.

We are told that during operations, these jobs would include management and administration as well as mechanics and engineers, surveyors, geologists, environmental specialists, and many others. Additionally, there would be hundreds of jobs indirectly supported by the project, including those to fill the new demand in transportation, the supply chain, as well as local community services like teachers, retail, and hospitality. That being said we look to Midas to step up and help us meet the challenges known and those challenges yet to be discovered. In addition, we look for help with solutions to mitigate the burden to local businesses affected by the loss of employees who become employed by Midas because of higher wages.

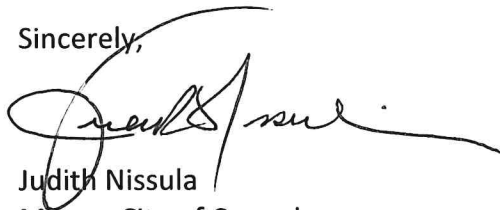
With the lifespan of this project being 12-15 years, we feel there should be a plan in place that assuages the effects of transitioning the local economy back to one of self-sustenance when the project has reached its lifespan.

A major employer can bring a sense of community ownership. We counted on the support of Boise Cascade's upper management as well as the local managers and employees. There was a sense of family whereby everyone was supportive of school, chamber and city activities. The logistic facility being ultimately located close to or in Cascade, could result in providing the regular Monday to Friday work week and help build a sense of community and family that has weakened over the years. Prior City Administration(s) had hoped that this would be located much closer if not within the City limits to help encourage the Midas employees to call Cascade their home. Given the current proposed location, company transportation coming out of the Treasure Valley would help reduce vehicle trips on Highway 55.

There may be additional impacts to the city airport as it primarily serves this back-country area.

We know there is a lot to consider when approving and permitting a project of this magnitude, it is our hope that Midas Gold will continue to work toward positive and meaningful solutions for all concerned.

Sincerely,

A handwritten signature in black ink, appearing to read "Judith Nissula", written over a horizontal line.

Judith Nissula
Mayor, City of Cascade



City of Council

September 22, 2020

Linda Jackson, Payette Forest Supervisor
U.S. Forest Service, Payette National Forest
500 North Mission Street
McCall, ID 83638

Dear Ms. Jackson,

On behalf of the City of Council, thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) regarding the Stibnite Gold Project proposed by Midas Gold Idaho.

Council is a small rural community located in west central Idaho with deep historical ties to mining here in the Gem State. In the earliest days of Idaho settlement, a trail up the Weiser River through what is now Adams County became the principal avenue of travel for pack trains carrying supplies from Boise to the gold camps at Warren and Florence. Then when the Thunder Mountain mining boom came in 1902, Council was the nearest rail town and became the "jumping off point" for that gold rush. By about 1905, the town had a population of about 1,000.

Therefore, when Midas Gold Idaho came to the historical Stibnite Mining District more than a decade ago with plans to start operations at the brownfield site we were naturally curious what the next era of mining would bring. Since their early days of exploration and study, Midas Gold Idaho has been working with local communities in central Idaho to describe their plans, potential impacts on this region, and listen to our input.

While a standard level of public review is mandated under the National Environmental Policy Act (NEPA), Midas Gold Idaho took this principle of public transparency and amplified it through the creation of the Stibnite Advisory Council. As a member of The Stibnite Advisory Council, we wanted to ensure Council had the opportunity to work directly with Midas Gold to have our questions answered, our interests represented and – importantly – to hold Midas Gold accountable. We have been encouraged to date by the efforts of Midas Gold Idaho to involve local communities and design the project with our needs—and the needs of the environment—top of mind.

Since the beginning of our community agreement and partnership with Midas Gold, members of the Stibnite Advisory Council have been privy to robust project discussions giving us insight and familiarity to this project. After reviewing the information presented by the U.S. Forest Service in the DEIS, we believe the analysis provided by the agency is comprehensive and would like to offer the following comments for consideration.

We would first like to recognize the time and resources Midas Gold has put into the permitting of this project. Mining is viewed as an inherently risky business. Historical mining practices have left the Stibnite Mining District beset with legacy-mining impacts like open pits and improperly controlled waste rock. However, Midas Gold was the first company to come in and dedicate nearly six years to studying the area as a comprehensive geological region, not just a potential deposit to be dug up. On top of this, the company has indicated they are prioritizing the best design aspects possible for their preferred plan. Not only did they originally submit the Stibnite Gold Project proposal to the U.S. Forest Service back in 2016, they resubmitted a modified plan in 2019 to incorporate additional improvements to help increase safety and decrease their environmental footprint.

We would also like to acknowledge the potential economic benefits that Midas Gold Idaho will bring to this region. As a town who got their start from mining, we know that that new jobs and economic input from the Stibnite Gold Project could have a real impact on our residents and the future growth of our community. The company's investment in Idaho is something that could bring new business, families and opportunities to Council.

Midas Gold Idaho will implement solutions in Alternative 2 that specifically address water quality, such as removing legacy waste rock, removing old underground workings and removing and reprocessing legacy tailings, thereby improving the water quality and local habitats. Multiple findings from Chapter 4 indicate these solutions will achieve their intended goal. Findings state that removing legacy tailings and waste improves water quality in Meadow Creek Valley (4.12-103-104) and lowers concentrations of antimony and arsenic in the East Fork South Fork of the Salmon River. (4.9-70).

Our motto is “the community that cares” and we stand by that. We care about the future and would not want to put our residents or this region's natural beauty at further risk. We urge the US Forest Service and responsible state agencies regularly monitor water and air quality to ensure standards are met throughout the life of the project. We also encourage regulators require that comprehensive financial assurance be secured before mining occurs to eliminate the risk of the area being abandoned once again.

Given the chance, the Stibnite Gold Project could bring jobs to central Idaho while raising the bar for their industry on safety and environmental protections.

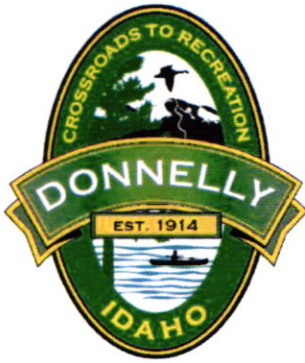
Therefore, we value the open dialogue about the challenges and opportunities presented by the development of the Stibnite Gold Project. To date, Midas Gold has fulfilled their responsibilities of being inclusive, transparent and responsive to our recommendations.

For that reason – and the others we have outlined above – the City of Council would like to urge the U.S. Forest Service to adopt DEIS Alternative 2 as proposed by Midas Gold Idaho for the Stibnite Gold Project.

Sincerely,

A handwritten signature in black ink that reads "Bruce D. Gardner, Mayor". The signature is written in a cursive, flowing style.

Bruce Gardner, Mayor



City of Donnelly

September 21, 2020

U.S. Forest Service, Payette National Forest
ATTN: Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Dear Ms. Jackson:

The Donnelly City Council and I want you to know that we support the Stibnite Gold Project and Midas Gold's efforts to restore the old Stibnite mining area and to mine gold and antimony. We want you to know we support Alternative 2.

We are a small community that is proud to host Midas Gold. We believe Midas' approach to the Stibnite Gold Project is a standard for other large businesses to use as they communicate with their community. Of special note, we find the Stibnite Advisory Council a resource that suits our needs. Simply stated, Midas Gold has been a valued partner and we look forward to a long and prosperous relationship.

We support Alternative 2 as the most practical approach and one that will be best for Donnelly and the other communities impacted by the Stibnite Gold Project. Alternative 2 basically improves on Alternative 1 – it is an updated and modified plan. Alternative 3 places the Tailings Storage Facility in reach of the East Fork South Fork Salmon river, Alternative 4 contains significant transportation and road issues, and Alternative 5 is to do nothing, leaving the area the mess that it is in today.

As with many of the respondents to the DEIS, we support the Stibnite Gold Project for multiple reasons but want to focus on two major points – the ecological considerations and the economy. However, we believe that Midas Gold's efforts to improve and begin cleaning up the mess that exists at Stibnite now is important to highlight. Its restorations efforts will enhance the quality of water and improve the area from a conservational perspective. Even *The Star News* has mentioned the potential for improved water quality.

Environmental Ecology and Conservation

Alternative 2 identifies significant water enhancements. An important point is that Alternative 2 has specific actions that will improve the overall ecological standing and that has a trickle-down effect that will improve water quality, limit or mitigate the potential for toxicants, and

mitigations to tailings that impact water. Also, the fish tunnel although not a water quality issue is an enhancement that will be beneficial for the South Fork Salmon spawning bed and passage issues will be greatly improved and restore salmon population.

Economic

Beyond the conservational enhancement, the economic improvements that Midas Gold will make available will be significantly import to Valley County. It is projected that Midas Gold will bring over 1,000 jobs throughout the life of the project. The trickle-down effect may include another 1,000 jobs. The importance of the Midas 1,000 jobs is huge. These will be well paying jobs providing salaries and benefits that will exceed \$80,000 per year. Midas is committing to conduct training that will help ensure the jobs will be available to local residents. Additionally, the impact to our tax base will further help our communities.

Both the environmental improvements and the enhanced economic opportunities are issues the residents of Donnelly have long awaited. The leadership and residents of Donnelly strongly support the Stibnite Gold Project for the two primary reasons provided. There are numerous other reasons, but our constituents believe these are the strongest reasons for our community.

Respectfully,



Susan Dorris
Mayor



BOARD OF IDAHO COUNTY COMMISSIONERS

September 29, 2020

U.S. Forest Service, Payette National Forest
ATTN: Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Idaho County is writing to provide comment regarding the Draft Environmental Impact Statement (DEIS) on the Stibnite Gold project as presented by the U.S. Forest Service.

The National Environmental Policy Act (NEPA) helps ensure all proposed projects meet strict standards for environmental protection. Stakeholders, regulators and experts have now reviewed the Stibnite Gold Project proposal for at least four years and local, state and federal agencies have analyzed the project. In our experience, Midas Gold Idaho has been transparent and cooperative, providing information to us on a regular basis. We have been provided with detailed technical information on water quality, safety and other project aspects when requested.

In communities throughout our country, we regularly see the scars left by historical mining on our landscape. It is important to us, and our local citizens, that before this project is approved it must first meet the strictest financial assurance requirements. We must be assured that the funding required to provide the required reclamation of Stibnite is set aside and protected through widely accepted financial tools rather than corporate guarantees.

Our initial concerns regarding this project were primarily about water quality and about construction of the tailings storage facility (TSF). Alternative 2 of the DEIS addresses these topics with thorough analysis.

Throughout the site, old tailings piles left by previous mining companies were never properly constrained and pose a risk of leaching metals into nearby streams and the groundwater. Under Alternative 2 in the DEIS, plans for the project during construction and operations will include activities to improve water quality, such as removing legacy waste rock, removing old underground workings and removing legacy tailings to reprocess and safely store them. It is very important that if mining operations are approved, these proposed actions to address legacy impacts remain in the final plan for the Stibnite Gold Project.

As it stands, the only opportunity on the table today to address legacy waste and contamination of the site is through approval of this project. What is not clear is what will happen if Alternative 5, no action, is selected? Will the current levels of contamination of our Salmon River continue?

The Stibnite site hosts a significant amount of antimony in addition to gold. If this project proceeds, Stibnite would be the only domestic source of antimony, a mineral critical to the defense of our country. By mining antimony at home in the United States, we would reduce our dependence on foreign sources of this important metal. Currently most of the global supply of antimony is sourced from China – either mined in that country or processed into usable form there. The supply chain for important materials is continually at risk. For example, in 2013, China imposed restrictions on the export of antimony-based products for several years, reducing availability and increasing prices. More recently, China has mentioned restricting exports of critical and rare earth minerals as part of its trade negotiations. We need to develop mines here in the United States to improve our bargaining power and remove uncertainty associated with the potential disruption of the supply chain for critical minerals.

Our local economy is, in part, dependent on a healthy fish population. While there are many factors impacting the salmon population, it is positive to see private industry taking steps to enhance habitat and access. If done correctly, the rehabilitation of the East Fork of the South Fork of the Salmon River could set a positive example of river restoration activity throughout Idaho where streams have been heavily impacted by past mining activity. We know that barriers to fish passage negatively impact the population, the fish passage tunnel design could also set a very interesting precedent as a solution that could be used elsewhere in Idaho.

Section 4.12-39 of the DEIS shows reconnecting fish to more habitat upstream will increase productivity and diversity of these isolated populations. The opportunities presented by these innovative solutions could offer positive change for the future.

River health is extremely important to us in Idaho County, and should the project move forward we would encourage regulators to choose the Burntlog route as proposed in Alternative 2. This option keeps mine traffic away from Johnson Creek and the Salmon River, reducing the risk of spills or accidents that could impact important fisheries and the waters that flow through our community. By upgrading the Burntlog route for mining operations the risk of spills and sediment delivery into waterways will be reduced. Additionally, the overall transportation plan and two-week work cycle proposed is designed to reduce traffic on back country roads and this traffic reduction will also have the effect of reducing dust and sediment, reducing risk of accidents and related risk of spills.

We initially had some concerns about the construction of the tailings storage facility (TSF), and the risk of failure, as this would have devastating consequences for Riggins. Our concerns about the stability of the TSF are adequately addressed by DEIS Alternative 2.

Midas Gold's design for the TSF as outlined in Alternative 2 meet or exceed Idaho's regulations for safety. The design ensures long-term stability of the TSF structure which is strategically placed in a solid location with 90% of the perimeter surrounded by granite mountains and the remaining 10% retained by a rock embankment and further buttressed with 65 million tons of rockfill. These design features

more than double the factor of safety required by the State. The TSF design can withstand an earthquake with six times more shaking than the recent 6.5 magnitude quake that occurred in the area in March of 2020.

With respect to the chemistry of the tailings deposited into the TSF, chemicals such as mercury, cyanide and arsenic will be neutralized, stabilized or removed as part of the processing cycle before any tailings material is deposited into the TSF, further reducing risk of impacting water quality.

Over the past few years, the ongoing study of the Stibnite Gold Project has highlighted the poor environmental conditions that exist today at Stibnite because of past operators. Arsenic levels in the East Fork of the South Fork of the Salmon River are far beyond safe standards. Each year, hundreds of tons of sediment continue to be dumped into the East Fork of the South Fork of the Salmon River and other waterways from Blowout Creek, impacting water quality and aquatic habitat.

Without the Stibnite Gold Project, we believe the ongoing environmental issues at the Stibnite site will persist well into the future. Further, this project represents the opportunity to source antimony in our own country, and reduce our dependence on foreign entities for our critical mineral needs. After our review of the DEIS, it is clear community voices have been heard, and there has been a thorough and adequate review of alternatives. This project should proceed.

Sincerely,



R. Skipper Brandt, Chairman



Mark Frei



Denis B. Duman



This institution is an equal opportunity provider / employer
City of New Meadows * P.O. Box 324 * New Meadows, Idaho 83654
Phone (208) 347-2171 * Fax (208) 347-2384

September 28, 2020

RE: Comment Letter Stibnite Gold Project

A few of the major factors in the Stibnite Gold Project we would like to comment about.

Environmental Factors and the impact any project may have are especially important to our community. Being good stewards of the environment is what the City of New Meadows tries to do. In the last two decades our own community has completed stream restoration projects with local ranchers and our own city sewer system has begun to discharge its sewer effluent into an adjacent field. Our community was built upon three major economic factors, logging, ranching, and mining. We believe our environment has been affected by these three economies. Some good and some that could have been improved. As industries change and grow, we expect the environmental factors by any development to not be like that of yesteryear. From Water Quality to the landscape, we know things change and hope that this project will be a positive for our region.

Cultural Significance and our heritage is important as a community. From the time the Nez Perce inhabited the area to today, we understand the project will be part of a changing landscape of our culture.

Economic Growth is expected with any project of this size. Spin off industries will be created calling for more of everything. Balancing this growth with the project is significant as each community strives to meet the needs of their citizens. We believe our community is ready for some of the economic spin off industries that will be created by the project. Our Comprehensive Plan indicates a need for new and vibrant businesses that are sustainable.

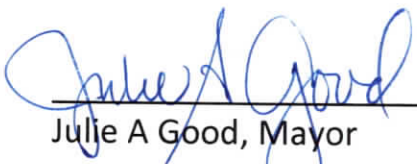
Mission Statement: "To provide citizens with a safe and clean community as we develop a vibrant, diverse economy together. Through coordinated and collaborative planning, we will utilize proactive means to provide effective, safe and fiscally responsible municipal programs and services while building and maintaining infrastructure of adequate capacity to accommodate present and future needs. With the overall health of each resident in mind, we will maintain an open and honest government as we plan for the future while preserving, protecting and enhancing our legacy."

Community Transportation is always difficult in our region. Removing traffic and vehicle congestion should be something the project developer studies. If a bus were to run from Council to the site, it should have stops in every community along the way, not just for the workers of the project, but also the community as a whole whose jobs were created because of the project.

Housing is a vital component to any project of this caliber. The region is already in a housing crunch. With the anticipation of this project, among other things, the price of homes has increased. We believe any project should assist the region in developing affordable housing. Our Comprehensive Plan indicates a severe need for additional housing. Staff believe the city is in need of at least 70 new dwellings to meet the current demand. With the project size, the housing demand will probably double if not triple in our community.

Restoration is an important portion of this project, if not the most important. We applaud Midas Gold in setting aside money for reclaiming the site. Taking all of the previous mining claims and combining them into a single project is very admirable. Reading their plan for restoring the fish habitats, water quality, landscape and natural habitat for the wildlife will take decades. The site being abandoned in the past should never have happened. The permitting agencies of yesterday should be ashamed of themselves for allowing the site to deteriorate to its current conditions.

We thank you for your time and attention and hope that the project will be a benefit to our community and the local environment.


Julie A Good, Mayor


Darla Weber, Council Member


Jeff Parnett, Council Member


Shiloh Ryker, Council Member


Darbey Edwards, Council Member

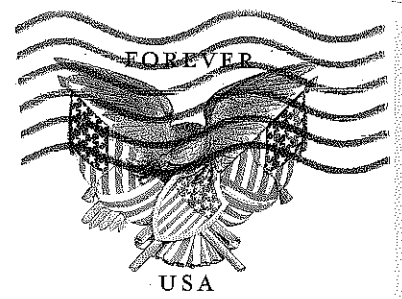
ATTEST: 
Jacob M Qualls, City Clerk / Treasurer



CITY OF RIGGINS
P.O. BOX 249
RIGGINS ID 83549-0249

SPOKANE WA 990

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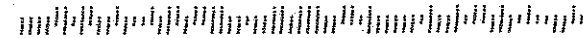
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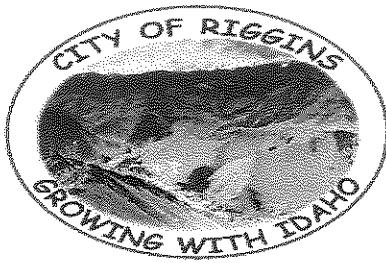
SEP 11 2020

PAYETTE NATIONAL FOREST
SUPERVISOR'S OFFICE

Linda Jackson, Payette Forest Supervisor
USFS, Payette National Forest
500 North Mission Street
McCall, Idaho 83638

83638-380500





CITY OF RIGGINS

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Fax (208) 628-3792
rigginscity@gmail.com

September 9, 2020

Linda Jackson, Payette Forest Supervisor
USFS, Payette National Forest
500 North Mission Street
McCall, Idaho 83638

RE: COMMENT LETTER ON STIBNITE GOLD PROJECT – EIS #50516

Dear Ms. Jackson:

The Riggins City Council has voted to approve the measures taken by the Stibnite Gold Project, with the understanding that the USFS will approve a project alternative that includes appropriate measures that will (1) prioritize the protection of surface water and groundwater quality, (2) prevent contamination of the Salmon River and its tributaries with toxic waste such as arsenic, mercury, cyanide or antimony, and most importantly, (3) provide adequate assurance that the tailing storage facility (TSF) will be designed and constructed so as to minimize the probability that it will fail (leak or breach).

There are risks inherent in any mining operation, and we have had a number of concerns raised by members of our community about the Stibnite Gold Project. After reviewing these concerns with Bob Crump, a local resident, retired Nuclear Physicist, and our appointed representative to the Stibnite Advisory Council, we have been assured that Alternative 2 addresses those concerns. Bob has ten years of experience as an Engineering Specialist performing probabilistic risk assessment (PRA) of nuclear power plants using tools such as fault tree analysis (FTA), accident sequence analysis (ASA), and failure mode and effects analysis (FMEA) while working at the National Engineering Laboratory in Idaho Falls and Gulf General Atomics in San Diego.

The lifeblood of our community is solely based upon recreational activities on the Salmon River thus the USFS and permitting agencies must assure the following:

- 1.0 Legacy tailings will be reprocessed to remove mercury, arsenic and antimony that are currently contaminating Meadow Creek. If Alternative 3 moves forward it would not allow that to happen.

2.0 Burnt Log Road will be utilized to keep truck traffic away from area streams as much as possible. Alternative 4 proposes traffic along Johnson Creek which would increase the risk of contamination if an accident were to occur which could impact important fisheries and the waters that flow through our community. Alternative 4 should not move forward.

3.0 Make sure risk assessment analyses are performed to assure that breaching of the TSF is an essentially impossible event and at the end of the project, impoundment is appropriately de-watered and stabilized and that any of the water generated during the tailings consolidation process is appropriately treated prior to discharge.

4.0 The TSF will be designed/constructed such that there is minimal probability of significant leakage of impounded contents to groundwater due to the two liners (each liner designed to have a half-life of 450 years), a leakage collection system between the liners, and an underlying bentonite clay barrier that will be laid down first. Alternative 2 outlines the liners with thorough analysis.

5.0 Midas' ore processing will neutralize, stabilize or remove chemicals such as mercury, cyanide and arsenic as part of the processing cycle before any tailings material are deposited into the TSF, further reducing risk of impacting water quality.

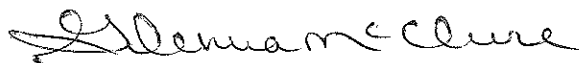
6.0 If trucks transport toxic waste such as antimony concentrate through the City of Riggins, concentrate will be in appropriate enclosed containers (such as super sacks) to prevent dust emissions.

7.0 Midas' first priority will be the construction of the bypass tunnel so that anadromous fish and local fish populations will be able to access old spawning grounds after 80 years of no access.

8.0 With the new bonding requirements in place that Midas must bond for actual costs of reclamation, make sure those funds are set aside in bonds or trusts, do not allow corporate guarantees. Make sure Midas has no recourse but to restore the site after operations per the Stibnite Midas Gold modified PRO.

Thank you again for allowing the City of Riggins the opportunity to comment on such an important project for our region.

Sincerely,



Glenna McClure
Mayor

Village of Yellow Pine
PO Box 10
Yellow Pine, Idaho 83677

August 27, 2020

USFS
Attn: Linda Jackson
Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Dear Linda,

The Village of Yellow Pine Association (VYPA) represents the full-time and part-time residents from Zena creek, Wapiti Meadows, and the Yellow Pine area, inclusive.

The VYPA proudly and emphatically expresses full support of the Midas Gold Idaho plan and Alternative 2 as outlined in the draft Environmental Impact Statement. The VYPA believes Alternative 2 to be the best solution to cleaning up and restoring the site.

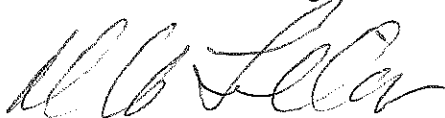
Historical mining activities in the Stibnite area have devastated the fish habitat and polluted the soil and water. We believe Midas Gold should be permitted to proceed with Alternative 2 as outlined in the Draft EIS. This would restore the fish habitat that has been destroyed for decades, clean up and manage the ground and surface water, and reduce erosion and sediment in the watershed.

Reducing metals in the water; repairing degraded fish habitat; reducing sediment and erosion; and benefiting the economy are issues of concern to the VYPA members.

The current condition of the Stibnite area is appalling. It is not only an eye sore, it is dangerous to wildlife and humans. No one except Midas Gold has stepped up with a plan to restore the area. And to do so while helping the local and state economy, as well as the strategic military reserves is laudable.

The Village of Yellow Pine Association strongly urges you to permit Alternative 2 of the Draft EIS.

Thank You for considering our comments.



Deb Filler, Chairman
Village of Yellow Pine Association