

# Valley County Board of County Commissioners

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Keith Lannom, Forest Supervisor  
Payette National Forest  
500 N. Mission Street  
McCall, Idaho 83638

July 18, 2017

RE: Stibnite Gold Project, EIS

Dear Supervisor Lannom,

Please accept this letter as Valley County's comments concerning the proposed Plan of Restoration and Operations.

Our first comment is concerning the future of Yellow Pine and surrounding areas. Primarily we will speak to the Village of Yellow Pine. The Village of Yellow Pine exists by catering to visitors looking to recreate, hunt, fish, raft, berry pick, sightseeing, etc. They also provide assistance to the mining activity in the region. Recently when Midas Gold was working at the Stibnite Site workers could stay in Yellow Pine and commute to work doing various jobs for the project. With the potential closure of access through the mine site this has a potential to be devastating to Yellow Pine and could create a ghost town in a few short years. Even though the proposed Burnt Log route would provide access beyond the Project Site it would bypass many from using the services of Yellow Pine. We believe the Forest Service working with Midas Gold needs to look at viable alternatives to allow the Public to travel through the site or around the site during peak periods.

One route in particular that is an option is the Sugar Creek Road which accessed Private Property, which is also a reason this route needs to remain open. With good intentions the route could be re-aligned where needed and re-constructed in other areas to provide a continuous route to beyond the Stibnite Project. We understand there is some steep terrain beyond some of the private lands however with sound engineering a route could be accomplished.

Another option would be Temporary Routes across the project that were signed or piloted for the Public to access routes beyond the site. There will probably not be activity every year in every section of the project to where a temporary route could be established.

Valley County could assist with seasonal closures to help reduce the impacts during the spring runoff as we have done with the current access to the Stibnite site.

The next concern we have is the impact to our existing county maintained routes. Heavy mining traffic will take its toll on the routes especially during spring runoff. Valley County imposes Weight Limits on our roads when this occurs. The Stibnite Project calls for working all year. How will Midas Gold handle the impact and inability to haul during spring runoff when the roads become impassible due to wet and soft conditions?

On roads maintained by Valley County that do not receive snow removal or not at the level of service the Stibnite Project might require there will need to be agreements created between Midas Gold and Valley County. These agreements will spell out the conditions that must be met to allow other agencies or companies to perform snow removal operations on roadways.

Additionally with mine traffic there is the safety of the travelling Public to consider. In prior years mine traffic was one way during the mornings and return traffic the afternoon. During the 1940's when the Stibnite Mine was producing Strategic Minerals the traffic came out one day and back in the next. Programs

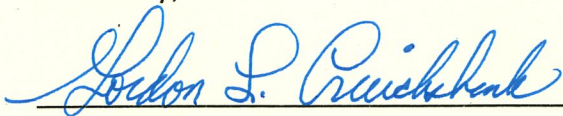
such as these may need to be imposed to help limit conflict with the traffic for the Burnt Log proposed access.

Snowmobiling in the Landmark region including access to Yellow Pine via Johnson Creek Road or Deadwood via the Landmark/Stanley Road is important for our winter recreation and economy. A recent study showed Valley County as the top place where people snowmobile and spend money. Accommodations for parking areas for the large trailers and vehicles will be needed in the Warm Lake area. Alternate routes will be needed for grooming to avoid the Warm Lake Road as it will have snow removed for the mine traffic. For safety reasons we would not want to encourage any vehicles hauling snowmobiles or pulling snowmobile trailers to be using the Warm Lake Road when it heads up the Warm Lake Summit past what is currently plowed in the winter. Providing this parking area and grooming of an alternate route snowmobiling will need to continue in this area for many to enjoy. This again is a portion of the economic benefit Valley County relies on to maintain our communities.

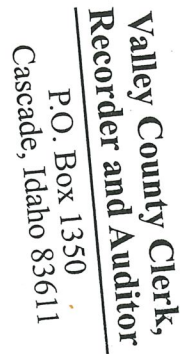
We recognize the efforts already made by Midas Gold to assist in restoring a mine site that had prior operations and had limited if any restoration performed. Midas Gold has been transparent with their work and we applaud the transparency they have shown to work with Valley County in being responsive to the concerns. Even though the operational life of the Stibnite Project seems long at 20 years or so the fact is the area is part of Valley County forever and the above concerns remain into the future beyond the life of this project.

We respectfully submit our comments on this project look forward to finding solutions and are willing to help in any area as long as funding is available for our efforts.

Sincerely,



Gordon L. Cruickshank, Chairman, Valley County Commissioners



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