

Robert Barrett

July 19, 2017

ATTN: Keith Lannom  
Forest Supervisor  
Payette National Forest McCall, Idaho 83638 Subject:  
Stibnite gold EIS Scoping Comment

Dear Mr. Lannom:

The roads surrounding the Stibnite Gold Project, Warm Lake, and along the Warm Lake Highway are used seven days a week for recreational access. The Midas Gold document "Plan of Restoration and Operations" anticipates a large amount of heavy vehicle mining traffic between the project site and Cascade, every five minutes, Monday through Friday, 6 am to 8 pm. This traffic schedule will have a dramatic adverse impact on public driving safety, wildlife, and road surface longevity along the Warm Lake Highway and Forest Service roads leading to the Stibnite Gold Project.

The Midas Gold document "Plan of Restoration and Operations" omits any detailed discussion or study data in the following areas which will have adverse effects to the wildlife, recreational access and serenity of the area.

- What are the estimated daily, itemized by day, Monday, Tuesday, etc., round trip for each type of vehicle? Summary tables in chapter 12 only normalize each type of vehicle round trip into a 365 day avg.
  - What will be the travel time between Warm Lake summit and Cascade for each type of vehicle?
  - Anticipated level of stacking up of traffic along the Warm Lake Highway.
- What routes, ID-55, ID-95, etc., are supplies, fuel, processed materials, hazardous waste, etc. coming and going before and after they reach the Cascade area?
  - What is the percent of traffic on each route? What are the anticipated impacts?
  - What if any State of Idaho or Federal studies regarding these routes currently being performed? Any public comment opportunities?
- Study and documentation of noise levels of heavy vehicle traffic going up and down Warm Lake Summit grade and Warm Lake Highway to Cascade.
  - Testing with the actual heavy vehicles to be utilized with anticipated loads.
  - Testing witnessed by stakeholders such as local residents.

- Document noise levels at several locations around Warm Lake and along Warm Lake Highway.
- Warm Lake Highway improvements?
  - Passing lanes
  - Slow vehicle pull-outs
  - Impact fees for the decrease in road surface lifespan due to heavy usage by mining related traffic.
- What if any State of Idaho or Valley County impact studies are there?
  - Impacts on traffic and road surface
  - Road improvements
- Cleanup bonding in case Midas Gold LLC goes out of business or “disappears”
  - The price of gold is very unpredictable. Midas Gold LLC could dissolve quickly. The Federal government could be going after hundreds of investors for cleanup costs, or having tax payers pay for cleanup.
- Environmental safety. Yes, Midas may utilize the latest technology and hopefully best practices, but the use of the latest technology may also generate new and unforeseen problems that could quickly get out of control. You only need to look at the 2010 Deepwater Horizon oil spill disaster.

The Forest Service and its representative engineering firm, AECOM, need to ensure that all of the stakeholders’ needs and concerns are taken in consideration when determining the project’s environmental, public safety, and financial compliance requirements.

Respectfully,

Robert Barrett

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