

August 28, 2020

To Whom it May Concern,

I have reviewed Midas Gold Idaho's Stibnite Gold Project Plan of Restoration and Operations (PRO) and met with members of Midas Gold Idaho to better understand the company's plans for the Project. Below are my comments on the plan to be included in the comment period.

Without the approval the Stibnite Gold Project, the historic Stibnite Mine area will never be restored. The nature of the formerly abandoned and orphaned Stibnite Mine site can be redeveloped and cleaned up with private capital versus taxpayer dollars. Midas Gold is willing to take on decades old environmental liabilities that are not from Midas Gold but from WWII era government sponsored / managed war time production efforts. It seems imperative for private entity stepping forward with a business plan to address these abandoned legacies. Upon issuance of the Record of Decision (ROD) and Notice to Proceed, the site can be cleaned up by private parties in an innovative way without resorting to duplicative bonding and excessive government oversight.

Midas Gold has presented a complete and comprehensive plan to restore the area. The various and numerous restoration and mitigation components of this Project that are above and beyond what the law requires. There are many checks and balances in place to ensure Midas Gold Idaho follows through on its promises to restore the site. The company is required by law to set aside the requisite financial assurances for restoration before mining can begin. I am confident that Midas Gold will stay true to its word and complete all the proposed mining, re-mining, reclamation, remediation, and restoration activities.

NEPA -- The National Environmental Policy Act (NEPA) is intended to ensure all projects meet federal and state standards for environmental protection and safety and requires a lengthy and exhaustive review. The Project has undergone more than 4 years of technical review by regulators, experts, and stakeholders. 11 local, state, and federal agencies have reviewed and analyzed the Project to develop the draft Environmental Impact Statement (DEIS). Midas Gold has been transparent and has worked diligently to inform the public and incorporate stakeholder input into the Project.

Alternatives -- Alternative 2 is the superior option for the project moving forward. In Alternative 2, the company decreased traffic during operations by 26 percent by generating lime on site (Tables 2.3-2, 2.4-3, 2.3-8). The company would also reprocess legacy materials in the Meadow Creek Basin, SODA and Hecla Heap, which remove them as a source for leaching arsenic and antimony into the ground and surface water. The analysis of the Draft EIS (4.9-17) shows this will make further water degradation from these sources less likely in the future. Removing legacy tailings waste will also improve water quality in Meadow Creek Valley (4.12).

Restoration -- The Project offer a unique opportunity to restore legacy impacts left behind from mining activity decades ago and brings restoration to the forefront of modern day, responsible, mining. The Project will:

- â€¢ Improve water quality by reprocessing and safely storing millions of tons of historical tailings.

- â€¢ Restore fish migration to spawning grounds where access has been blocked for over 80 years.

- â€¢ Restore the East Fork of the South Fork of the Salmon River to flow naturally and support fish passage after decades of pouring into an abandoned mining pit.

- â€¢ Exceed reclamation standards required by law with design that restores and creates dynamic ecosystems that are sustainable and long-term.

- â€¢ Be fully bonded to ensure restoration occurs.

Fish and Wildlife -- Restoring the East Fork of the South Fork of the Salmon River is at the core of the Project design and provides a pathway for anadromous fish to reach historical spawning grounds within the first year of operations. To protect fish & wildlife the Project will:

- â€¢ Minimize disturbance to wildlife habitat by utilizing previously disturbed areas as much as possible for their operations, 43% of the project footprint in Alternative 2 is on previously disturbed land.

- â€¢ Utilize responsible night lighting to mitigate light pollution and minimize noise where possible.

- â€¢ Install a wildlife exclusion fence around the tailings storage facility (TSF), process facility areas and related process ponds to reduce potential risk to wildlife.

- â€¢ Undertake reforestation and fish habitat enhancement across the site, not just project-impacted areas, to improve the overall quantity and quality of wildlife habitat.

Water Quality -- Without the Project, there are no identified solutions to address legacy waste and contamination of the site. Midas Gold has never conducted mining operations at Stibnite but is willing to provide long-term and large-scale solutions to the legacies left behind by previous operators and regulators. Midas Gold will reprocess 3 million tons of historical tailings & repurpose the 7.5 million tons of spent heap leach ore, removing an existing potential source of water quality degradation from the watershed. Without the Project, there are no identified solutions to address legacy waste and contamination. Midas Gold's plans include Interim stabilization of Blowout Creek in the first years of construction and operation, fixing the most significant source of sediment in the watershed. Full restoration at closure will improve water quality, stabilize the water table in that area and re-establish

wetlands habitat. The Project will improve water quality through:

- â€¢ Removal of legacy waste rock in or adjacent to the East Fork of the South Fork of the Salmon River.

- â€¢ Removing or addressing several historical underground workings that are likely sources of surface and groundwater water quality impacts.

• Enhancing or restoring more than 12 miles of the East Fork of the South Fork of the Salmon River and tributaries, adding quality fisheries habitat.

• Removing and reprocessing historical tailings.

• Repairing Blowout Creek, the largest sediment source in the area

• Reforesting to reduce sediment runoff.

Access -- The Burntlog Route, incorporates existing Forest Service roads, keeps traffic away from fish-bearing waterways, avoids known avalanche sites, reduces environmental risk, and keeps sediment out of the waterways. Modifications in Alternative 2 further reduce wetland impacts and shorten the route by over one mile. Midas Gold's work schedule and traffic plan minimizes travel trips to increase safety and reduce greenhouse gases emissions. Additional design refinements reflected in Alternative 2 reduce traffic by more than 20%. Proposed through-site public access maintains current accessibility to Thunder Mountain while prioritizing safety.

Jobs -- The Project is a \$1.1 billion dollar investment in Idaho and the company will spend an additional \$2 billion over the life of the Project. Mining in the U.S. gives an opportunity to provide jobs here at home and the Project will create 500 direct jobs with an average salary of \$80,000 during operations and a similar number of indirect jobs. Midas Gold has and will continue to prioritize hiring locally and training for Idahoans. The Project will add \$200 million direct and \$500 million of indirect and induced state and federal taxes over the life of the Project.

Critical Mineral -- The Project will be the U.S.'s only source of mined antimony, a listed critical mineral needed for important technological, industrial and defense applications and necessary for the country's

domestic security and supply chain independence. The U.S. Department of Commerce lists antimony as one of 35 critical minerals. China controls most of the world's supply of antimony.

I commend Midas Gold for their past on ongoing efforts. They have planted more than 60,000 trees to help reduce the amount of sediment going into the river, installed solar energy panels at site to reduce greenhouse gas emissions and improved miles of road along the river to protect fish habitat.

As the U.S. Forest Service and other state and federal agencies review the proposed plan and determine the course of action, I encourage you to consider and appropriately weigh the positive benefits Midas Gold will have on Idaho. Alternative 2 truly is a win-win opportunity for Idahoans and the environment.

Thanks for your Consideration,

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