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Comments: These comments are in response to the Stibnite Gold Project (SGP) EIS #50516.

I share a 100-year-old family homestead property on Johnson Creek a short distance from Stibnite and have been visiting the area for 60 years, including spending whole summers working and playing there during my teen and college years. My parents and grandparents also spent summers there throughout their life, so there are very strong family connections to this area. Now that the EIS has been released and public input requested, I need to express my significant concerns about the Midas Gold Stibnite project.

It is clear that the EIS is written by Midas Gold from their perspective and they are marketing this project to get it off the ground. It is also clear that they have gained support from many Idaho residents and the state legislature as a way to bring money and jobs into the area while claiming that they are [ldquo]restoring[rdquo] the area.

Midas is even helping people write their letters of support, which parrot the Midas Gold marketing points. Many of the people that have commented may not realize the negative environmental impacts this project will have on the area, and the unrestored hazardous areas that will be left behind forever. My comments will focus on these significant concerns.

A big concern of mine is the large-scale destruction of the Stibnite area which will leave behind 100 million tons of hazardous tailings over 413 acres of the pristine Meadow Creek valley and leave two very large hazardous pits that will fill up with water but be unsafe for recreational use. Midas Gold will be removing 436 million tons of rock from over 500 acres of open pits. For each ounce of gold they recover, they will be removing 80 tons of rock, a concentration of 1 ounce of gold from 2,560,000 ounces of rock, or 0.00004%.

If this low concentration of gold is profitable even with the large expense of the Stibnite mining construction, once the Stibnite mining infrastructure has been built, much lower concentrations of gold will be needed for them to profitably mine in the surrounding area. I am concerned about the continued mining expansion in the surrounding area, including the Johnson Creek drainage, Big Creek drainage, Thunder Mountain area, etc. How much destruction is going to be allowed in this area for such small quantities of gold?

Here is a summary of the key points of this document and requested changes to the Midas Gold plan. I discuss each of these items in the following sections.

- 1) Midas Gold should not be allowed to use Johnson Creek Road for construction or operations. They should only use the Burntlog Route when they have completed it.
- 2) The Johnson Creek substation planned to be adjacent to Bryant Ranch property should be moved farther away and not be visible from the Bryant Ranch. Visibility of higher power poles and any expanded right of way across Bryant Ranch property should be mitigated.
- 3) Midas Gold should not be allowed to leave behind two large unsafe mining pits and 100 million tons of hazardous tailings on the valley floor, behind a 460 ft. embankment. They should minimally be required to safely place the tailings back into these pits, from where they came.
- 4) Midas Gold should not be allowed to refer to this as a [ldquo]restoration[rdquo] project. Calling this a restoration project is deceiving, as this is a mining project 30 times larger than all previous mining at Stibnite, and leaves behind more significant environmental issues than exist now.
- 5) Since markets change and unforeseen financial issues inevitably arise, it is critical that Midas Gold be required to pay sufficient funds into the escrow account on a periodic schedule (i.e. monthly/quarterly) in advance of the destruction that will take place. This needs to be spelled out prior to plan approval to ensure adequate restoration funds are available at all times.
- 6) It is also essential that citizens, particularly local citizens, have visibility into the on-site activities and all environmental and safety issues that arise. Independent regulators need to ensure that this information is made available in realtime through an on-line website.
- 7) How does the US 9th District Court ruling against the Forest Service in case 19-17585 affect approval of the

Stibnite Gold Project?

Midas Gold construction and operation traffic should not use Johnson Creek road

During the first three years, before the Burntlog Route is completed, Midas Gold traffic is planning to have a significant amount of construction traffic on Johnson Creek road. Also, if there are construction issues or problems later, Midas Gold will use Johnson Creek road as a backup.

Midas Gold's plan indicates that there will be 65 one-way trips average per day of which the majority will be during the 5-day workweek (6am to 8pm window). There will be an average of one construction traffic vehicle every 12 minutes. Given the traffic will be much higher than the average during peak times, this will have significant impacts to the Johnson Creek valley, its residents, and campers at the many campgrounds along Johnson Creek road.

Midas Gold is planning to transport a massive quantity of environmentally hazardous liquids and solids to Stibnite. Their plan estimates deliveries of: 7,600,000 gallons of bulk liquids in 1,000 deliveries per year (this includes fuel and lubricants, and chemicals including nitric and sulfuric acids, hydrogen peroxide, etc.); 44,000 tons of bulk solids (not including lime) in 1,900 deliveries per year (including sodium cyanide, ammonium nitrate, etc.); and up to 70,000 tons of lime in 2,917 shipments, depending on how much lime is produced at Stibnite. It only takes one spill into Johnson Creek to create lasting environmental problem.

Johnson Creek road is dirt and narrow in many locations, steep in many locations, and right next to the creek in numerous places, creating traffic safety and environmental concerns, particularly during the winter when there is snow and ice on the road. There are locations where road widening is not feasible given the steep hillsides without significantly disturbing Johnson Creek. Given the constant flow of large and hazardous vehicles that Midas plans to use on this road, this creates hazards and delays for other vehicular traffic, and hazards of accidents and hazardous material spills into Johnson Creek. Such spills do not simply "wash away." They deposit along the creek and would poison the creek for many years.

In addition, every summer, the Nez Perce Tribe installs and services a salmon weir across Johnson Creek near the Bryant Ranch to support the rejuvenation of the salmon spawning grounds in Johnson Creek. The roadway is right next to the creek at this location and the heavy Midas Gold traffic is likely to have a significant impact to the daily operation of the weir. The Midas Gold traffic and hazardous material will impact this salmon restoration operation.

Because of the accident risks, the high potential for hazardous spills into Johnson Creek and the EFSFSR, and the impact to residents, campers, fishermen, rafters/kayakers, the Nez Perce Tribe, and salmon, Midas Gold should not be allowed to use Johnson Creek and Stibnite roads during the construction phase nor during operation. The alternate route using Burntlog Route is the preferred route because of these issues. If permitted, Midas Gold must be required to build Burntlog Route first to provide construction and operation vehicles access to Stibnite.

Concerns about visibility of the Johnson Creek substation and taller power poles/lines

Midas Gold's plan is to increase the voltage of the existing power lines from 69 KV to 138 KV. To do this, they will need to replace all the power poles with noticeably taller poles with wider right of ways. Since these power lines and poles will be traversing the Bryant Ranch property and the poles and right of way will be very visible from our residences, we are concerned about how this will blend into the natural environment that exists.

The plan should address the mitigation measures that will be taken.

Also, a new substation, the "Johnson Creek substation," is planned to be built just south of the Bryant Ranch property. We are concerned about the visibility of this substation from our residences and any other impacts, such as noise. We request that this substation be located in a place that is out of sight/range from the Bryant Ranch property.

This is a huge mining operation, NOT a restoration project

The Stibnite Gold Project refers to their project as a "restoration" project. They describe how they will restore the damage done through mining operations over the past 100 years and extend fish access farther upstream. But then the project plan goes on to describe a massive mining operation, orders of magnitude larger than all the mining operations of the past 100 years:

1) Three huge pits being mined (picture in your mind how big these are):

Yellow Pine pit (197 acres, 460 ft. deep with a 700 ft. high wall, 168 million tons mined)

West End pit (173 acres, 400 ft. deep with a 1,250 ft. high wall, 166 million tons mined)

Hanger Flats pit (140 acres, 660 ft. deep with 1050 ft. high wall, 102 million tons mined)

Total pits (510 acres, max 660 ft. deep, 436 million tons mined)

Note: 640 acres = 1 sq. mile = 3,097,600 sq. yards

29 times more earth mined than all previous mining (436 million tons planned vs 15 million tons mined over previous 100 years)

2) Above-ground unused rock storage areas are huge (they are referred to as Development Rock Storage Facilities, DRSFs, but they contain rocks that are mined from the pits but have no minerals of interest)

Hanger Flats DRSF (120 acres, 460 ft. high, 81 million tons)

Fiddle Creek DRSF (155 acres, 480 ft. high, 68 million tons)

West End DRSF (73 acres, 400 ft. high, 25 million tons)

TSF Embankment (88 acres, 460 ft. high, 61 million tons)

Total above ground DRSFs (436 acres, 480 ft. max., 235 million tons)

3) The hazardous Tailings Storage Facility (TSF) is huge and cannot be restored

413 acres, 460 ft. high embankment (i.e. dam), 100 million tons of tailings

405 acres of the TSF will cover currently undisturbed wetland/meadows of Meadow Creek

33 times more hazardous tailings being left behind than from all previous mining operations (100 million tons planned vs. 3 million tons previously)

The Stibnite project will disturb a total of 1,991 total acres, of which only 841 were disturbed in previous mining operations, more than twice the total acreage of all previous mining disturbances. Midas Gold is deceiving the public by calling this a restoration project and is diverting attention away from the fact that this is a massive open pit mining operation in the headwaters of the East Fork of the South Fork of the Salmon River (EFSFSR) that leaves behind a much larger area of damage which cannot be restored.

The TSF and Hanger Flats pit will create a much larger environmental problem than exists now

As indicated above, the TSF will be a huge reservoir with 100 million tons of hazardous tailings, 33 times more than all previous mining operations. How can Midas Gold call this a restoration when it is removing 3 million tons of previous tailings and generating 100 million tons more, behind a 460 ft. high embankment. This will be an existing hazard forever.

The Hanger Flats pit being left behind is even larger than the current Yellow Pine pit that Midas Gold plans to fill with rock and [ldquo]restore.[rdquo] Midas Gold is merely replacing the existing Yellow Pine pit problem with a much bigger Hanger Flats pit problem two miles upstream on Meadow Creek, with a 460 ft. embankment behind it, that will be a problem for fish getting upstream (the same problems the Yellow Pine pit currently has). After Midas Gold[rsquo]s [ldquo]restoration[rdquo], the Hanger Flats pit will not be safe for recreational use and one will have to climb the 460 ft. embankment to get to the [ldquo]restored[rdquo] Meadow Creek, which is built on top of 413 acres of hazardous tailings. This is not restoration.

What[rsquo]s the plan for inevitable Tailings Storage Facility leaks after Midas Gold has left the area

Midas Gold[rsquo]s plan states [ldquo]All dams leak to some extent and this must be observed, monitored and controlled.[rdquo] While the plan indicates [ldquo]water from the underdrains would be collected and returned to the supernatant pond and recycled to the ore processing plant,[rdquo] what about TSF leaks that don[rsquo]t end up going into the drains? Years after the 100 million tons of tailings have been deposited and Stibnite ore processing has been shut down, how will leaks be handled? How will these be fixed? Who pays for it? What is the effect on ground water, Meadow Creek and the EFSFSR, and the Hanger Flats pit?

Too much destruction to recover such small concentrations of gold

As mentioned above, Midas Gold will be mining 436 million tons of rock from their three huge open pits. How much gold does Midas Gold hope to recover? About 5 million ounces. This means that they will be mining about

80 tons of rock to get only 1 ounce of gold (worth about \$1,800). In 80 tons of mined rock, they also expect to only recover perhaps 2 ounces of silver (worth about \$42). In 80 tons of rock, they expect to recover about 28 lbs. of antimony (worth about \$80). High gold prices are what makes this project viable, silver and antimony really don't matter except in marketing the project.

Gold concentrations of 1 ounce from 80 tons of rock is a concentration of 1 ounce from 2,560,000 ounces of rock or about 0.00004 %. Midas Gold should not be allowed to create this level of destruction for this small concentration of gold in the beautiful headwaters of the EFSFR.

Midas Gold indicates in the EIS that it is not economically feasible to fill in the Hanger Flats and West End pits. They should be required to backfill these unrestored and hazardous pits with the material that they remove from the pits. It is inconsistent for Midas Gold to say that it is economically feasible to create huge open pits to recover 0.00004% gold concentrations while saying that it is not economically feasible to backfill the pits. The problem is that the gold concentrations at Stibnite are too low for Midas Gold to restore the area as should be required. They should be required to mine areas of higher concentrations where they are able to restore/refill the pits. To restate, dumping 100 million tons of hazardous tailings on top of Meadow Creek valley behind a 460 ft. embankment is not restoration.

Some facts about the gold and antimony

One of the arguments being used by Midas Gold to sell this project is the strategic importance of these minerals to the U.S. While there is no doubt that gold is very valuable in the open market, it is not even listed on the 2018 U.S. Department of Interior list of 35 minerals considered critical to the economic and national security of the United States. In fact, 48% of gold demand in 2019 was for jewelry, 29% for investments, 15% in central banks, while only 7.5% was for technology. Most worldwide gold production is consumed by China and India, which goes into jewelry. China and India combined use 9 times more gold than the U.S. Given the world market for gold, the Stibnite gold mine would be supplementing this jewelry market.

Regarding Antimony, it is on the U.S. Department of Interior list of 35 critical minerals. But because of the very low market price of antimony (i.e. < \$3.00 / lb., less than a lb. of ground beef), it has not been profitable to mine and process it in the U.S. The reason prices are this low is that there has been an adequate supply worldwide. At these prices, I doubt Midas Gold will make any profit on antimony. I think the costs to process the ore on-site, to ship the concentrate from Stibnite to an unknown facility for further processing and extraction of the antimony, and all the overhead costs associated with this will exceed the income they will get on its sale.

There is a reason their name is Midas Gold. It is all about the gold, which mostly satisfies the Asian jewelry market.

Bonding/escrow

Mining has a legacy of leaving behind unrestored operations and hazards that future generations are left to manage. Past mining operations have commonly [run out of money] and were not able to pay for restoration. To mitigate this, an escrow account is to be established by Midas Gold that is supposed to cover the cost of restoration, should their operation fold at any time.

The Midas Gold document provides no specifics about funding for restoration work. In fact, it states: [In order to carry the substantial costs related to the restoration of legacy impacts, Midas Gold needs to have sufficiently economically robust project to finance the site restoration and to justify its investment.] Since markets change and unforeseen financial issues inevitably arise, it is critical that Midas Gold be required to pay sufficient funds into the escrow account on a periodic schedule (i.e. monthly/quarterly) in advance of the destruction that will take place. This needs to be spelled out prior to plan approval to ensure adequate restoration funds are available at all times.

If licensed, citizens need to be kept informed of Midas Gold status and issues

Given the scale and hazards associated with this project, it is essential that there be on-site independent monitors to verify that Midas Gold is meeting all environmental regulations and the terms of their plan. It is also essential that citizens, particularly local citizens, have visibility into the on-site activities and all environmental and safety issues that arise. Independent regulators need to ensure that this information is made available in real-time through an on-line website.

Key mining concerns exposed by the controversial proposed Alaskan Pebble Mine project

Through cozy relationships with state and federal officials at all levels, the Army Corps of Engineers and the

Environmental Protection Agency, and the Alaskan Governor, the Pebble Mining project executives were able to game the EIS approval system in their favor. Fortunately, their scheme was exposed. For reference, see: <https://www.cnn.com/2020/09/25/politics/alaska-pebble-mine-executives-legislators/index.html>

There are some interesting parallels to the Midas Gold Project, including impacts to salmon spawning grounds, major impacts to the environment, and hazardous tailings waste being left behind. Here are some key points that raise concerns about the Midas Gold Stibnite project.

- 1) A recording of a Pebble Mining project executive reveals: [ldquo]The Clean Water Act, it says that the Army Corps of Engineers [lsquo]will issue a permit based on the least environmentally damaging practicable alternative.[rsquo] So I mean, you may still cause a lot of environmental damage but if it[rsquo]s the least damaging alternative, you get your permit.[rdquo]
- 2) After agreeing to shrink the footprint of the mine and only operate for 20 years when required for plan approval, the Pebble Mining executives also revealed in recorded tapes that they were really planning to expand the mine and operate for close to [ldquo]two centuries[rdquo], while developing several other mines in the region.
- 3) The revelations led to an apology and resignation of an executive who would have earned a \$12 million bonus if the mine was permitted.

Point 1 above is very relevant to the Stibnite project. While Midas Gold will say that their preferred plan is the least damaging of the various alternatives, as noted above, the Midas Gold Stibnite project is very destructive to the area and will leave behind two very large pits, will greatly affect the natural Meadow Creek and Fiddle Creek valleys and creek flows, and will leave 100 tons of hazardous tailings in Meadow Creek behind a 460 foot embankment.

Point 2 is also extremely relevant to the Midas Gold project. While the Stibnite mining operation is planned for 12-15 years, with a total project life of 20 years, the EIS indicates that they will continue exploration in the area for expanded mining opportunities. To quote the Midas Gold document, [ldquo]Even after a hundred years of exploration and development activities in the Stibnite Mining District, many exploration prospects remain that eventually may warrant consideration for development[hellip] Midas Gold plans to conduct new exploration and development drilling work[hellip] Approved exploration will continue under current plans, as well as in new surface areas[hellip][rdquo]

Once the mining infrastructure is in place (e.g. ore processing plant, roads, power lines, housing, etc.), the cost of expanded mining in the area will be minimal. Given the very low mineral concentrations of gold that are needed to make expansion profitable, what[rsquo]s to stop a major exploration and potential mining expansion in surrounding areas (e.g. Thunder Mountain area, Johnson Creek area, Big Creek, etc.)? If Midas Gold is permitted to mine and damage the Stibnite area, they must not be allowed to continue this destruction in surrounding area.

US 9th District Court judge ruling in case 19-17585

In a court case with similarities to the Midas Gold Stibnite project, a district judge ruled in July, 2019, against the Forest Service approval of the Rosemont Copper Company mining plan to dispose of extensive waste rock and tailings on the surface of unpatented mining claims. It ruled that the Forest Service may not approve a mining plan [ldquo]without first determining who may, as a right, use the surface,[rdquo] and that Rosemont[rsquo]s use of the lands for its waste rock and tailings facilities was [ldquo]unauthorized[rdquo] under the Mining Law. How does this court ruling affect the legality of Midas Gold[rsquo]s plan to dump tailings and waste rock on the surface of their unpatented mining claims?

Potential consequences of Midas Gold selling the Stibnite mining operation

Many of the written comments so far refer to Midas Gold being a better environmental steward than other mining companies, but it is very likely, that this mining operation will be sold to a large mining company after they have gained approval. Realize that Midas Gold is a new company set up to do exploration, planning, EIS[rsquo]s, and marketing, but has never actually run a mining operation. If it is sold, there are no guarantees that a new owner would show the same concern about the Stibnite area.

Wildlife concern

What is the effect on birds from tailings during the life of the project? While the report indicates that cyanide levels will be reduced to levels protective of wildlife, are the tailings and supernatant pond safe for birds?