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Comments: I am a property owner in McCall, avid recreationalist, environmentalist, ID registered professional geologist, and work on the Stibnite project. I am writing as a private citizen, not as a representative of Midas Gold. As a stakeholder with both community ties and technical expertise of the project, I advocate for approval of the PRO and adoption of DEIS alternative 2 as the preferred alternative.

Economy
Having lived in McCall for over five years, I know that good jobs are hard to come by in Valley County. Many residents, especially those with college degrees, leave the county every year to seek better paying jobs in larger communities elsewhere. The >1000 direct, indirect and induced jobs anticipated to be created by the Stibnite Gold Project (DEIS Section 4.21.2.1.2) will have a significant impact on the county's job market and will raise median income. These jobs will also increase the number of jobs available outside the tourism/service/construction sector, allowing career minded residents to obtain employment in a larger variety of employment sectors and diversifying the Valley/Adams county economy.

Recreation Access
Winter snow removal on the warm lake road over landmark summit with public access is a component of all alternatives except for alternative 5 (i.e. Section 4.16.2.1.1). Year-round snow plowing will allow backcountry skiers and snowshoers who don't own snowmobiles to easily access the fantastic backcountry ski terrain on Landmark Summit. Section 4.21.2.1.2.6 points out that new access could provide new recreation opportunities but does not specifically reference backcountry skiing. Galena Summit and Moore's Creek summit are some of the few places in southern Idaho where you can currently drive up to high elevation and access decent ski terrain. Skiers utilize Big Creek summit west of Warm Lake, but this area has mediocre ski terrain with a low gradient approach up a south facing slope prone to icing over. Ski terrain up Landmark is clearly superior with multiple aspects and varied gradients and the possibility to run a car shuttle. Keeping Landmark open in the winter will greatly increase backcountry recreational opportunities for non-motorized backcountry skiers and should be included in the preferred alternative.

Geochemistry
Alternative two entails two important mitigation measures excluded from other alternatives; 1) covers on waste rock dumps, and 2) water treatment capabilities. The modeling analysis in the DEIS indicates that these measures under alternative 2 result in an improvement to surface water quality downstream of the site relative to existing conditions for arsenic and antimony. The predictive geochemical model is useful in demonstrating that proposed mitigation measures are likely to do as intended; mitigate the impacts of the mining project to water quality.
Section 3.9.3.3.2 documents extensive groundwater contamination in meadow creek valley associated with legacy mining impacts. Figure 3.9-17 shows that current groundwater quality in the area where extensive reclamation work was performed in the late 1990s and 2000s exceed the arsenic standard by two orders of magnitude. Improvements to groundwater quality anticipated in association with the proposed mining activities through removal of legacy mining materials and pit dewatering are shown to result in a net improvement to groundwater quality in this area; arsenic concentrations noted in 4.9.2.1.3.1 under alternative 1 are almost an order of magnitude lower than current conditions, as compared to figure 3.9-17. This is a significant improvement and, due to interactions between surface and groundwater, as noted in Section 3.8.3.2.6, is likely to also improve surface water quality once the alluvial aquifer is sufficiently flushed of sorbed metalloids.
If you ever go down into the existing Yellow Pine pit, there's so much sulfide altered rock exposed in the pit walls that it smells like rotten eggs. The DEIS tabulates exposed potentially acid generating rock (PAG) remaining in the pit highwalls after cessation of mining activities but does not provide the public with any sense of how much

PAG is currently exposed in the pit highwalls, giving the false impression that PAG in the pit walls may lead to ARD issues. The geochemical analysis conducted for the project is based on a large number of static and kinetic characterization samples which cover the full range of lithological and alteration rock types and is appropriate for impact analysis. This testwork shows a low probability of acid rock drainage, as correctly noted in the DEIS in 4.9.2.1.1.4. The EIS should consider the presence of widespread sulfide altered rock currently exposed on site to provide context for future PAG rock exposures to bolster the conclusion that ARD is not anticipated to be an issue for the project.

Scenic Resources

As much as I like the Payette National Forest, the project area it isn't particularly scenic relative to nearby Long Valley, the Lick Creek summit area, or parts of the Frank Church, where I've spent considerable time recreating. The DEIS correctly concludes that the historic activities currently [visually] dominate the landscape (Section 4.20.2.5). The mining history and associated ground disturbance are actually what makes the Stibnite district visually interesting and draw motor sports enthusiasts to the site. Without this, it would basically look just like any other part of central Idaho; moderate mountainous terrain with expansive forests which are partially burned, and not particularly pretty. Proposed mining disturbances won't make the landscape less scenic than it already is, and may actually be a draw for recreationalists touring the area and interested in viewing a modern mine site. The long term reclamation plans entail extensive regrading of dumps and revegetation, which once established, are likely to improve the scenery on the site and blend in with the natural landscape.

Hazardous Materials

Midas Gold has an excellent track record in storing and transporting hazardous materials to the site, with no past incidence of spills, as correctly noted in 4.7.2.4.2.5. The DEIS correctly identifies the most probable release scenario as involving small spills rather than major truck turnovers. None the less, with increased hauling of hazardous materials to site, the likely hood of a major spill will increase. For this reason, site access routes along major waterways, such as the Johnson Creek-Yellow Pine Route of Alternative 4 should be rejected as the preferred alternative; the proposed Burnt Log route is the safest environmental alternative. Mitigation measures including use of trucks with spill kits and reduced speed limits on secondary roads have been proven effective and should be adopted in the preferred alternative. Measures which reduce the number of vehicles on the roadway should also be adopted.

Climate Change

The plan to update transmission lines and bring grid power to the project site is a significant measure mitigating green house gas emissions and should be supported in the final decision. Alternatives to grid power for crushing and grinding rocks would entail onsite power generation, most likely using diesel, and would substantially increase GHG emissions. Section 4.4.2.1.1 estimates direct green house gas emissions of 67k MT Co2eq/year from fuel and 214M MT CO2 eq/yr from electricity consumption. The estimate for electricity consumption is based on the current IPCo emission rates per MWh. These rates are likely to decrease substantially in the future as IPCo has pledged to obtain 100% of its power from clean sources by 2045, which is about when the project operations will end under the current mine schedule. The analysis should attempt to forecast the increasingly green energy sources for power generation when determining emissions associated with the project. Purchases of renewable energy credits could be used to further offset GHG emissions associated with grid power.