Data Submitted (UTC 11): 10/27/2020 6:00:00 AM
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Comments: Thank you for this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) that the Payette and Boise National Forests (USFS) published in the Federal Register on August 2020 for Midas Gold Idaho Inc.'s (MGII's) proposed Stibnite Gold Project (SGP) in Valley County, Idaho as outlined in MGII's Plan of Restoration and Operations (PRO). These comments are submitted formally and for the administrative record within the extended public comment period ending on October 28th. As discussed in the following sections, the many environmental, social, recreational, ecological and economic benefits associated with implementation of the SGP warrant the USFS adopting Alternative #2 for its preferred alternative in its Record of Decision and doing so as soon as reasonably possible. I appreciate the efforts of the USFS and its team to evaluate the project.

I am a career scientist and geologist and have worked in the minerals business, the environmental consulting industry and in the oil patch over my +35-year career. Part of this experience includes a stint serving in the USFS as a Certified Minerals Administrator and was specifically responsible for administering mining operations and working with authorized line officers to insure operations were conducted in accordance with USFS regulations. I worked extensively with Region I and Washington office staff, Contracting Officers and line officers as well as with other staff from the BLM, state and federal regulatory agencies dealing with abandoned mined land site cleanups in and around the Coeur d'Alene Basin and elsewhere. I also was involved in the revamping of the USFS operated Emerald Creek Garnet Recreational site after I was tasked with finding a way to either fix it or shut it down due to the then existing water quality issues, public safety concerns and wetlands and aquatics impacts. That exercise resulted in a major "rethink" and modification of that project and today it operates successfully with way less environmental and ecological impacts and provides a popular recreation opportunity to thousands of Idaho and out of state citizens annually. I cite this experience to make a point about how I believe you should view this project - not "how do we stop it", but "how can we make it work?" Issues on this site have been around for decades and are not going away. As one of the original employees and I like to think a founder of some of the restoration concepts of the project I can say with certainty it was, has and always will be a goal of our team to find ways to minimize impacts and not look for ways to skirt the issues, but to take them on - head on and find ways to make it happen because the site's existing issues bring opportunities for improving site conditions, ecological health and environmental conditions at the site and the entire watershed.

In my various roles I have worked at and visited numerous active, closed and reclaimed and abandoned legacy mines sites, administered permitting of projects under the National Environmental Policy Act (NEPA) and USFS 36 CFR 228 Subpart A regulations, and dealt with Clean Water Act (CWA) compliance issues and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) issues at both active operations and abandoned mine lands (AML) sites and am considered a qualified expert in those areas based on my education and experience. Please consider my comments in your review of MGII's SGP Plan of Restoration and Operations (PRO) under the 36 CFR 228 A regulations and the DEIS under NEPA as you move forward in the analyses and decision-making process.

Full disclosure - I am an employee of MGII and a shareholder of Midas Gold Corp., MGII's parent corporation, and have been involved with the project since its initial concept stage over a decade ago. However, my comment letter is my own as a stakeholder, a concerned citizen, a fisherman, and a regular recreational user of Idaho's lakes, rivers and forests, including regular use of the area for these activities within and around the project area, and represents my own views and opinions and are not necessarily those of my employer.

For ease of comment letter compilation, I have tried to place my comments in the same order as the respective resources appear and are found at 36 CFR 228 A regulations since ultimately that's what the entire NEPA

process is for - to facilitate analysis and disclose impacts of activities authorized under those regulations. This is for several reasons - including to emphasize the importance of the purpose of the NEPA exercise and the EIS process is to evaluate the operator's proposal not to conduct a NEPA exercise just for the sake of it. The stated agency (USFS and US Army Corps of Engineer's or "USACE") purpose and need as noted in the DEIS Purpose and Need statement (DEIS, Chapter 1, Sections ES 3.1 and 3.2, pp. ES-5 to ES-6) among other things is to process the MGII PRO and meet the requirements of other laws and regulations. I urge you to keep this in mind as you analyze the project, the DEIS alternatives and ultimately select a preferred alternative and make your decision. I also want to emphasize that although the NEPA exercise is dominantly an analysis, alternatives evaluation and disclosure exercise with a goal of meeting the agency's obligations to minimize impacts there also is a need to meet the operator's Purpose and Need and to fulfill the agency's responsibilities under the US Mining Laws. To that end and to better understand the goals of the company besides constructing a profitable mining operation I suggest if you have not already done so, that you review the sections in the company's PRO that discuss its goals (PRO, Section ES.2, pp. ES-1 to ES-2) and the values and principles the company used to develop its PRO (PRO, Section ES.4, p. ES-5).

This is not a discretionary action by the USFS like a timber sale, but an obligation to fulfill under the agency's responsibilities mandated under numerous laws as discussed in more detail below in my comments. The size and extent of analysis of the DEIS is extensive and goes well beyond the requirements outlined in the Council of Environmental Quality guidelines from which the USFS.

NEPA regulations are tiered and tied to. This however has resulted in an overly large document that has involved repeated extensions of previously agreed upon time frames for the NEPA analyses. I respectfully ask that you, as a minimum, push your staff and cooperating agencies to meet the projected and previously agreed upon date for issuance of the Final EIS (FEIS) and Record of Decision in Q3/2021. To delay this project further with more detailed and unnecessary additional studies is a waste of your staff's time, federal taxpayer's dollars, MGII's time and money, but more importantly delays put needed restoration provided for in the MGII PRO farther out needlessly.

The SGP presents the USFS, other State and Federal agencies, local and regional stakeholders with a chance to capitalize upon the environmental restoration measures that are an integral part of MGII's proposed project that otherwise would likely not happen. As a Forest Supervisor you no doubt have been around to remember one of the former Chiefs of the USFS who provided a mission statement years ago that included the statement "Issues Bring Opportunities." This proposal to use private-sector resources to remediate historical environmental contamination and major ecological issues in an important watershed on lands under your management that have remained on the site for decades is a huge opportunity and the old saying "don't look a gift horse in the fanny" surely applies here. Legacy exploration, development and mining activities including extensive activities funded by and executed by or on behalf of the Federal government at the site to produce antimony and tungsten to support the US and Allied military war efforts in World War II and the Korean War have left this site as scarred as any in the country's AML inventory. Without the activities outlined in the PRO, and further described and modified in Alternative 2 of the DEIS, The Stibnite site would revert back to its previous condition - an orphaned AML site continuing to adversely impact the surrounding area's wildlife, fisheries and water quality while it awaits questionable taxpayer funding, competing with hundreds of other sites across the west with significantly more human health risks that generate higher scores in the AML arena.

Air Quality

The site is remote from large metropolitan areas and as such generally has good air quality except during fire season and during inversions. Thus, as noted in the DEIS (DEIS, Appendix F), there are likely to be some negative impacts associated with operations. The DEIS (DEIS, Appendix D, Table D-2, p. D-21 and p. D-28) outline some, but not all of the basic mitigation steps MGII has agree to minimize these impacts. Others include use of propane versus oil or diesel where practical and possible to limit emission of particulates. Construction of

a lime kiln on site (DEIS, Ch. 2; Section 2.4.5.3) versus haulage of lime from offsite reducing greenhouse gas emissions from truck traffic and fugitive dust from vehicle traffic to and from site. The reduced truck traffic results in lower greenhouse gas emissions from eliminating the need for approximately nine lime transport trucks per day hauling lime from Oregon or Montana the most likely sources for lime. Potential nitrogen and sulfur deposition screening analyses was performed and described in the DEIS in Chapter 4.3.1.3.5 (p. 4.3-15) using assumptions resulting in a significant overestimation of potential nitrogen species deposition close to the facility and is viewed as very conservative. Potential mercury emissions, a potential concern from many operations were evaluated to verify that emissions would comply with the EPA emission standards provided in 40 CFR 63, Subpart EEEEEEE, for gold ore processing and production facilities. Midas has committed to incorporate appropriate mitigation for fugitive dust and emissions best management practices that include:

* Use of water and as needed dust suppressants to running road surfaces in the mine and haul roads.
* Use of wet drilling methods where practicable.
* Use of water spray bars at loading/unloading points for materials management to reduce fugitive dust.
* Use of high efficiency bag filters and fabric filters to reduce fugitive dust in crushing and griding circuits.
* Use of energy efficient parallel flow regenerative shaft kiln versus traditional rotary kiln to reduce greenhouse gas emissions.
* Use of cleaner fuel (propane vs. coal/oil).
* Use of solar panels on the rooftops of the worker housing facility to build off its current successful small solar facility and decrease reliance on external power. (PRO; Section 7.8).

MGII is required to obtain a Permit to Construct (PTC) from the Idaho Department of Environmental Quality (IDEQ) and to comply with provisions of the Clean Air Act. On September 10, 2020, DEQ issued a draft PTC for the proposed facilities. The PTC limits the emissions from proposed mining activity (drilling, blasting, excavations, etc.), ore and lime processing (crushing, screening, grinding, etc.), ore beneficiation (pressure oxidation, electrowinning, retort, furnace, etc.), and ancillary equipment (aggregate and concrete production, process and building heaters, emergency equipment, etc.). Analyses and modeling demonstrate that the maximum potentialemissions from the SGP facilities will not cause or contribute to an exceedance of anyambient air quality standards (IDEQ, Draft PTC, September 10, 2020). The proposed operations and associated mitigation measures should minimize impacts as much as practical and feasible.

Water Quality

The DEIS notes that by removal of legacy waste materials from historic mining at the site spanning nearly a century that these actions will improve water quality over existing conditions. There are over three million tons of metal-laced mine tailings from the World War II era laying in an unlined or capped pile in the middle reaches of the Meadow Creek valley, a tributary to the East Fork of the South Fork of the Salmon River (EFSFSR). These former mine wastes are covered with over seven million tons of former heap leach ore in a facility known as the Spent Ore Disposal Area (SODA). A former hydropower dam failure in the East Fork of Meadow Creek (locally known as Blowout Creek) in the 1960s sheds tens of thousands if not hundreds of thousands of cubic yards of excess sediment downstream annually impacting downstream water quality throughout the watershed. Elevated sediment levels can clog fish gills, make it hard for them locate food and avoid predation and reduces their ability to fight diseases and can choke off oxygen supplies to the gravel beds, reducing productivity of salmon spawning habitat. Unconstrained release of arsenic- and antimony-contaminated sediments left over and in unstable sites throughout the project area for decades cause negative impacts to aquatic life, botanical resources and other terrestrial and avian receptors.

As an example of how this "issues bring opportunities" concept can be placed into context as it relates to impacts from the former hydropower reservoir dam blowout. Despite this happening on public land managed by the USFS way back in 1965, there has been essentially no effective fix (nor $ available) to address this major sedimentation issue. Lots of studies by intelligent, well trained, qualified and well-meaning fisheries and aquatics teams from the

USFS, fish management agencies (NFMS, USFWS, IDF&G) have been undertaken, but with no secure funding available or in sight to actually design, evaluate and cost out full blown holistic alternatives and ultimately execute this sort of massive earth moving project, the issue still remains today 55 years later.

Following the failure, limited restoration efforts between the 1980s, and 2000s were conducted by various parties and included multiple episodes of willow plantings and woody debris placement on eroded slopes, however these have been ineffective given the scale of the damage and the types of geomorphic conditions present. Arguments that project opponents make against the project that have run the local editorial pages for months and spouted by the project's opponents are mute as long as this feature continues to be the largest source of excess sediment in the watershed. Rough ballpark estimates of the amount of excess sediments that resulted from this dam failure from 1965 until today are around 1 million cubic yards of excess sediment... and the damage continues unabated today. Midas has developed and agreed to fix this issue even though its outside the footprint of their project. This is the opportunity part and the USFS as public land managers and stewards have an obligation to move on with the analyses and issue the ROD in a timely fashion, so this opportunity is not lost for another half century.

The MGII team hired well respected and qualified independent fisheries and aquatics consultants along with engineering and design teams, many (in fact most) of whom have extensive USFS and other state and federal stream restoration experience in the planning stages of the project before the PRO was even filed to evaluate alternatives for the project components. For Blowout Creek the basic description of the proposed action can be found in Section 5 (PRO, Section 5.1, Table 5- 1, p. 5-4) with further details in the mitigation plan section in the PRO (Appendix F, Section 6, p, F22; PRO, Section 6.2, p. F-28). Pertinent sections in the DEIS that describe the activity are found at Chapter 2.3.5.9, p. 2-44 (Alternative 1) and modifications to the proposed action in Chapter 2, on pages 2-104 and 2-107. The additional changes in Alternative 2 make sense from a habitat and water management perspective and I suggest Alternative 2 components be adopted and carried forward in the preferred alternative and ROD.

To gain a better understanding of the effort the MGII team went to fully vet and evaluate options for this problem review the mitigation alternatives assessment options in Appendix G, Section 8.10, pp G-79 to G-81) and summarized in the DEIS in Chapter 2 (DEIS, p.2-139 to p.2-146 and Table 2.9-1). The preparation of the PRO involved many qualified environmental professionals both within the MGII ranks and independent of the company and this work cannot and should not be discounted by the USFS and USACE in their evaluations and are part of the proposed action. It is incorporated by reference into the DEIS through the operators Proposal in Alternative 1 and modifications in Alternative 2. Much of this pre-proposal effort is lost in the massive DEIS document due to its shear size and is relegated to an appendix and if you have not reviewed the sections in the PRO cited above for your analyses and decision making I urge you to do so.

The MGII plan specifically addresses the river sedimentation problem by initially installing a rock drain below the site of the failed dam and then rebuilding the stream channel to prevent excessive sediment from entering the river, while simultaneously raising the water level in the wetlands above to restore full functional value. These upland wetlands over time have been drying out and head cutting is continuing and will continue without action. As proposed, the SGP would remedy most of these historical impacts by:

* Removal and encapsulation of legacy mill tailings which contain high concentrations of arsenic and antimony and other constituents will result in long term reductions in metal loading in surface and ground water in the EFSFSR (DEIS, Chapter 4, Section 4.9, pp. 4.9- 70) and in Meadow Creek (DEIS, Chapter 4, Section 4.12, pp. 103-104);
* Restoration of a proper functioning wetland in the upper East Fork of Meadow Creek (Blowout Creek) that will allow for filtration of runoff and wetland habitat;
* Elimination and mitigation of a longstanding source of excess sediment in the EFSFSR watershed reducing overall turbidity and more importantly reducing excess fines which lead to cobble embeddedness a major concern of fisheries biologists;

* Removal and proper disposal of roughly [frac12] million cubic yards of sediment, much of it arsenic and antimony contaminated, built up in the lake formed in the former WWII Yellow Pine open pit;
* Extensive revegetation of the site which will ultimately, once reestablished, provide and effective natural sediment filters reducing overall sediment loads;

If there is any question that the company works to do things right - all that is needed is to look at their track record on site. During the exploration phase of the project, now complete, all drilling utilized biodegradable drilling muds and downhole products such as soybean oil - suitable for use in drinking water wells as a highly conservative measure - and not required by any law or statute to ensure they did not contaminate groundwater during drilling operations. In addition, the company established drill water recirculation protocols early on and tailored specifically to the site to ensure water wasn't wasted nor contaminated needlessly. In fact, during MGII exploration drilling operations, USFS and the Idaho Department of Lands minerals staff routinely brought other operators, contractors and their staff to the MGII site to teach them how to do it right - the Midas way. We are proud of that records and it reflects the extra effort and great lengths the Midas team has gone to since the beginning - a team made up of local folks, mostly Idahoans who care about the environment they work and play in and understand the importance of the project.

Solid Waste Management

Site solid waste management will entail multiple waste streams and will require careful management and oversight to ensure compliance and to make sure issues that have arisen in the past at this site, when regulations were less strict, don't repeat themselves. Operation of camp and workplace sanitary water treatment facilities, and trash and sanitation facilities must conform with applicable Idaho health codes and other regulatory requirements. This is a matter of law and regulatory enforcement not an option for the operator. To maximize reuse and minimize waste onsite plans include composting of leftover food and biodegradable wastes to incorporate it into manufactured soil for site restoration work. The lack of soil is major problem at the site and the issue can be addressed by the opportunity created by having multiple growth media stockpiles throughout the property. These facilities will utilize not only biodegradable camp wastes, and will include blending with chipped wood and slash as appropriate to develop the right mix of "browns and greens" any gardener knows are important to proper soil supplements. Other types of solid wastes and garbage will be handled as per applicable solid waste regulations. Recycling will be mandatory at the site, as it is today, and bins will be placed throughout the housing facility and the site to help facilitate this. Non-recyclable trash from all site facilities will be transported to a central collection location near the housing facility for periodic pickup and off-site disposal. (DEIS, Section 2.3.5.11, pp. 2-54 to 2-55; PRO; Section 8.7.1).

Midas has been conducting operations here for a decade with a recycle, reuse and repurpose approach. The company installed and has used a waste oil heating system to reuse their spent oil products (where suitable for such use) versus hauling the waste oil off to be tossed into a hazardous waste disposal facility. Midas initiated recycling at their own operations from the start and introduced the village of Yellow Pine to it where Midas has established recycling bins in town and provides recycling help for events such as Harmonica Festival. These actions are a good representation of what we can expect down the road. As another example and on a somewhat larger scale on more than one occasion and with permission from regulatory agencies the company has collected and sent scrap metal from decades old equipment bone yards to metal recycling facilities.

The site contains an extensive amount of former mine related dirt piles, old foundations and everything under the sun left over from nearly 100 years of mining and occupancy. To manage this during the exploration phase of the project the company established a go/no go policy for areas determined or thought to contain legacy wastes that might be harmful to our staff, the public or the environment. Over time and with the gathering of more detailed information the company has built up a pretty good picture of where "stuff" may be that one would be concerned about during any mining operations. The company must comply with all applicable solid waste management laws and regulations, both state and federal during operations. Thus, arguments made by some that the company will

operate, dump stuff and then leave without cleaning up after themselves are off base since if the company does not handle these materials correctly including proper characterization, excavation, handling transport and disposal - they cannot operate - period.

The company has agreed to provide a detailed waste management plan that must be approved by appropriate state and federal regulators prior to start-up, and once in operations monitored for compliance. Since inception the company has extensively characterized water, sediments, soils, rocks and waste materials throughout the property including in former mined materials disposal areas (former development rock storage areas and dumps, former tailings disposal areas, former heap leach pads and other areas of potential environmental concern). This includes drilling of over 150 monitoring wells, waste characterization wells and boreholes for other types of site characterization. In addition, combined with historic work done by past operators and by regulatory agencies it is a robust a dataset as I have ever worked during my career. The knowledge from all this test work was used to outline the occurrence and location of contaminated materials and was integral to the development of the site layout in the PRO - specifically siting of facilities on previously disturbed areas so that they could be cleaned up as part of operations - limiting new disturbance and dealing with existing issues. Given this detailed approach, it is prudent to consider this effort in any decision about changing proposed sites for facilities such as the tailings storage facility, development rock storage facilities, camps and other ancillary infrastructure. Alternative 2 best follows this approach by reusing area already damaged and the reuse will involve fixing old problems at the same time.

Scenic Resources

There a number of steps proposed by MGII to address concerns about impacts to scenic values as outlined in the PRO (PRO, Section 6.2.17, p. 6-16) and as listed as mandatory mitigation measures (DEIS, Appendix D - Mitigation Measures, Table D-1, Item F-4, p. D-2 and Item FS-27, p. D4) and include, but are not limited to the following:

* Architectural designs for structures would be required to follow principles and concepts outlined in the Built Environment Image Guide (BEIG) and site layout would be required to abide by Forest Plan Standards where practical and safe and in accordance with national, state and local building codes as a mitigation measure for forest users who may pass through the area and observe site operations (DEIS, Appendix D - Mitigation Measures, Table D-1, Item F-4, p. D-2 and Item FS-27, p. D4).
* To the extent practicable, interim and concurrent reclamation practices will be implemented to limit temporal losses of visual quality for area visitors;
* External lighting will be kept to the minimum required for safety and security purposes. Lights will be directed down toward the interior of the SGP site and shielded, where appropriate and will follow "Night Sky" Best Practices where practicable and in accordance with Mine Safety and Health Administration workplace safety regulations;
* Suitable surface coatings or exterior design features will be used on mine site buildings and other structures to reduce visual impacts;
* Restoration actions and final reclamation practices will restore disturbed areas and reclaimed topography to blend with the surrounding landscape (see PRO, Section 14.1.3).

The Visual Quality Objectives assessment in the DEIS including existing conditions and (DEIS, Chapter 3.20; DEIS, Appendix O-1) provides a few photographs of some areas, but completely is lacking in an effective photo set showing existing conditions in the main area proposed for future site disturbance. This area is heavily impacted already from a century of logging, mining and a townsite in addition to wildfire. Thus, any reader reviewing the Visual Quality Objective (VQO) discussions in the DEIS Chapter 4-2.0 would get the immediate and misleading impression that the proposed mining activity was going to impact a pristine area which is far from the actual situation. Extensive past disturbance covers several thousand acres at the site and it currently fails to currently meet most Forest Plan VQOs and that does not come across at all in the documents. MGII went to

great lengths to site its proposed infrastructure in areas of existing disturbance and this does not come across in the discussions in Section O-6 (DEIS, Appendix O, pp. 0-6-2 to 0-6- 5 at all). The discussion in the DEIS on existing conditions has 4 paragraphs discussing regional landscapes, but only one paragraph discussing the historical damages from a scenic quality standpoint at the site as present today (DEIS, Chapter 3.2, Section 3.20.3.1- Characteristic Landscape, pp. 3.2-06 to 3.20-8). I would suggest reviewing the photographs found in MGII's PRO that show historic site disturbance (PRO, Appendix D) and current site conditions (Appendix E) as a means to judge the impacts and effects of the proposed action and alternatives. Based on my understanding of site conditions, and I am thoroughly familiar with the area having hiked around it for the last decade conducting exploration work for MGII, and Alternative 2 provides the best option for preserving and ultimately enhancing the scenic quality situation at the site.

I might note that MGII has worked hard to reclaim as they go from its earliest exploration work and sites we drilled a decade ago, often look better than the surrounding terrain a testament to how doing it right works.

Fisheries and Wildlife Habitat

MGII spent considerable time, energy and conducted extensive research into designing the layout for the SGP specifically to provide a means for migrating fish to reach historical spawning grounds on their own within the first year of operations and then provide permanent access to roughly 25 miles of perennial stream and 6 miles of anadromous fish spawning habitat above the existing barrier at the Yellow Pine pit that has been there since the late 1930s. (DEIS, Appendix D & J-3). While the executive summary appeared to only provide minor references to this, in the main body and appendices of the DEIS, it concluded that activities proposed in the MGII PRO and in its mitigation plan including removal of existing barriers to fish migration. These actions will improve existing conditions for bull trout, chinook and steelhead in the Salmon River watershed - a priority for federal, state and tribal fisheries managers by:

* Developing stable, long-term access to historically blocked critical habitat resulting in increased productivity; (DEIS, Chapter 4.12, Fisheries Resources, pp. 4.12-39);
* Improving habitat and access which will increase genetic diversity of isolated populations; (DEIS, Chapter 4.12, Fisheries Resources, pp. 4.12-39);
* Providing improved access to feeding and refuge areas which will improve overall productivity. (DEIS, Chapter 4.12, Fisheries Resources. pp. 4.12-39).

There is a lot of public rhetoric surrounding how mining will destroy fisheries in this watershed. I urge you to dig in deeper and examine the facts. Fish passage on this site has been cut off sincethe early 1930s when the initial dams were constructed in the East Fork of the South Fork of theSalmon River (EFSFSR) below the junction of the EFSFSR and Meadow Creek (Federal Power Administration, 1930). Later, in 1938, diversion of the EFSFSR occurred even lower when the open pit operations extended through the lower EFSFSR reach cutting off the fish passage further downstream. Thus, for the last 90 years fish have not been able to pass upstream into theheadwaters of one of the tributaries to the Salmon River. And yes, mining was responsible, back before there were regulations about this sort of thing. However, if someone is going to fix it where have they been for the last 90-years. Your path as the Authorized Officer is clear here - approve MGII's PRO with any stipulations and mitigations needed to meet the requirements of laws and regulations and move this project forward by selecting Alternative 2 as the USFS Preferred Alternative to carry forward to the FEIS and in the ROD lest the lack of fish passage situation continue to deteriorate for another 90-years. Again, the concept of issues bring opportunities is central to the project thesis - mining can help restore this site and it would be a disservice to the public and other stakeholders to delay or impair this opportunity to restore "Salmon fish to the Salmon River" any longer. 90 years is long enough and Midas has offered up a viable solution and has the resources to execute it.

Road Management

Two routes to the site were evaluated in the DEIS: 1) the project proponent's preferred route along Burntlog Road (Alternative 1-3); and 2) an existing road network along Johnson Creek and Stibnite-Yellow Pine Road (Alternative 4). The road proposed in the PRO, along Burntlog Road (Alternative 1) as modified in Alternative 2 is clearly the best choice for life of mine site access compared to Alternative 4 along the existing Johnson Creek/Stibnite-Yellow Pine roads as described in Section 2.6.4.1 of the DEIS. Reasons include public and worker safety, lower environmental impacts, lower risks of spills, greater distance form well-traveled public roads and eliminates traffic through Yellow Pine among other positive factors. In fact, the Burntlog Road route was recommended to Midas by local citizens and after a review by their team it was adopted as their preferred choice for the reasons cited above. Given the extensive work done prior to the PRO submission outlined in Appendix G of the PRO on road alternatives and additional work in the DEIS it is clear the appropriate road route to be carried forward should be Alternative 2.

Reclamation

Because today's laws and regulations require exploration and mining companies to provide financial assurance to guarantee reclamation at the end of the project should they somehow default, mines today will not become future abandoned mined land sites. In the event a company goes bankrupt or defaults on its reclamation obligations, state and federal regulatory agencies will have bond monies available to reclaim the site. Thus, operator failure to reclaim their work is a historical problem and not one that will grow in the future. Reclamation elements written into the plan are not optional and, once the plan is approved, MGII will be required to reclaim the Stibnite site and financial assurance (bonding) will be in place before mining begins to guarantee the work is completed.

The MGII plan is more than a reclamation plan and includes extensive site restoration - at a scale never before possible at this site given limited funds and resources of federal and state agencies. Operations start out early addressing legacy environmental impacts during the construction period and continue with concurrent reclamation as the project develops. The plan involves reclamation and then restoration of Blowout Creek, the former tailings and spent ore disposal area and much of the sites previously disturbed areas - the legacy of 100 years of use with little reclamation required then nor completed. Reclamation standards exist today that did not decades ago and failure is not an option. Not only to USFS regulations at 36 CFR228 A require reclamation so does the State of Idaho in IDAPA regulations at 20.03.02 that require restoration of soil productivity and revegetation standards after mining operations that at least meet existing and surrounding site conditions. The company has been active on the site for over a decade and if there is any question about their ability to reclaim and restore the site please go visit some of the sites that were drilled a decade ago. My guess is that you will not know where the drill sat and will be impressed with the results of the company's efforts. In that context, I take issue with some of the comments in the soils section of the DEIS (DEIS, Chapter 4.5, p.4.5-15 which states in regards to the time frames for soil productivity to return "...analysis assumes recovery of greater than 40 percent soil productivity of natural background within a 50-year timeframe to be unlikely (due to the nature of disturbance and the conditions at the site) and, therefore, the duration of impacts would be longer- term, well beyond the 50-year threshold..."

First, given that MGII has planned to develop large growth media stockpiles to help develop new soils since site soils are essentially gone throughout much of the site due to 100 years of anthropogenic activity this assumption seems to ignore that material will be generated and adaptive management practices implemented UNTIL soil and vegetative productivity return to levels required by law and regulations. Secondly, as note before, Midas has been operating on the site for a long time and tried many methods to find out what works and what does not in site versus the cookie cutter approach used in past reclamation and restoration efforts on the site. Throughout the soils section and also in the vegetation section of the DEIS I found the language and analyses used overly conservative and even extreme assumptions about the inability of the site to return to functionality. These are simply exaggerations and I recommend these sections be reviewed and edited appropriately to provide a more balanced discussion. The law requires that vegetation and soils be returned to a functional state and stating

impacts will extend for over half a century is simply preposterous if proper reclamation management practices are applied and enforced.

Compliance with other laws and regulations

Any modern mining operation must comply and abide by a myriad of regulations from local, state and federal authorities. The Project can onlyoperate when in compliance with applicable federal, state and local permits that mandate practices and procedures to mitigate environmental impacts and to reclaim disturbed areas. These agencies are required to and will conduct routine inspections to ensure compliance with applicable monitoring and reporting regulations. Project detractors will point to damages to this site and others from decades ago when there were no such regulations in place as a sign that the past is a sign of the future - disregard the rhetoric. A summary of the basic permits required for the project to proceed are provided in the operator's PRO (Section 6.3 Permits and Regulatory, pp. 6-17 to 6-20; DEIS, Chapter 1,) and the DEIS describes Forest Plan Consistency requirements in several sections DEIS, Appendix A; DEIS, Chapter 4.1.8). This framework is a lot different and way more comprehensive and protective of the environment that 100 or even 50 years ago when a lot of the damages to the Stibnite site occurred. As a former minerals administrator for the USFS I can attest that enforcement is possible and can be done in a timely fashion when warranted and to assume otherwise is inappropriate and flat out wrong.

Public Safety

Traffic Safety:

Operations at the site will have to conform to all health and safety rules and regulations laid out by the Occupational Safety and Health Administration (OSHA) and Mine Safety and Health Administration (MSHA), where and when each are applicable. Such regulations require worker safety training and the maintenance of safety plans in support of mining operations. These same procedures can and will be applied where appropriate to protect site visitors and members of the public that may visit the area.

One of the most dangerous things any of us do is get in a motor vehicle and travel to, in and around the project site are no different. The company early on adapted procedures to protect their staff and other road users by use of radios, signage, travelling in convoys, routine maintenance of roads and implementation of mandatory speed limits for company staff, often lower than posted speed limits to be conservative and to be safe. Midas currently and still would utilize vehicle speed tracking devices, mandatory driver safety training and speed gages and ither methods to evaluate driver performance. These same types of practices would be implemented during operations, just at a larger scale and would benefit workers and public users on mine and system roads.

There are several components of several of the alternatives I believe are not in the best interest of worker or public safety. First and foremost is Alternative 4 which calls for travel to and from the

site along Johnson Creek Road and then through the town of Yellow Pine and on the narrow, switchback ridden and steep Yellow Pine-Stibnite Road. Although this is the primary access route to the site today it is a relict of the WWII era push to get access for haul traffic in and out of the site due to the WWII emergency needs for raw materials - in the case of Stibnite, tungsten and antimony. This route is and will be avalanche and rock fall prone and parallels sensitive steams along steep embankments over much of its length. Without going in to great detail (see PRO, Appendix G, Section 8.11, pp.G81-G89) it is clear the proposed route along Burntlog Road is way better from a public and worker safety standpoint since it avoids the low lying avalanche prone valley bottoms and remains at higher elevations with less grade than the existing route. Modifications to the original proposal found in Alternative 2 make sense and should be the preferred alternative carried forward for the following reasons:

* Shortest road length containing steep vertical grades and within avalanche and landslide potential areas;
* Much less elevation loss after the first summit;
* Least amount of excavation and hauling excess rock material to a disposal site;
* Least amount of new disturbance to previously undisturbed National Forest lands and RCAs;
* Minimizes the risk of hazardous material spills into major waterways (only one significant stream crossing over the entire route);
* Least road length paralleling streams (compared with the other routes that travel along the South Fork of the Salmon River, EFSFSR, and Johnson Creek), reducing the risk of hazardous material spills and sediment load into streams;
* Least road length shared with residents of Yellow Pine, along Johnson Creek, and other road users accessing Big Creek and other back country areas, reducing the potential for impacts, road use conflicts and accidents;
* Least amount of retaining walls required;

A second area of concern relates to Alternative 3 that would involve placement of the project's tailings storage facility in the upper East Fork of the South Fork of the Salmon River versus the existing Meadow Creek site as proposed in Alternatives 1, 2 and 4. This alternative site contains a number of very large landslides and some have been active recently and blocked the road on numerous occasions in the past ten years. The topography in this alternative site shows extensive evidence of solufluction or soil movement downslope under the influence of gravity a sign that the ground is moving and likely not a place to place a dam and a tailings facility. This choice if it were selected would also leave the large pile of former legacy mine wastes from the WWII era in place impacting surface and ground water and likely impacting fisheries for decades to come. Thus, selection of Alternative 2 is the wise choice.

Explosives Handling and Safety:

Modern mines have to implement a wide variety of measures to prevent safety incidents while transporting, handling, sorting or utilizing explosives and to ensure they are not available to unauthorized or untrained people and to provide for worker and public safety. Measures that have to be incorporated into explosives management plans include requirements for drivers and transportation that include mandatory driver background checks, Department of Transportation training and certifications, drug and alcohol testing and many other requirements. Permits and authorizations for explosives transportation, handling, storage and use will fall under multiple federal and state agencies and local jurisdictions and will require routine and regular inspections, magazine security checks and other considerations. Since 911, the handling and management of explosives has come under much more significant scrutiny and this project will be no different. Midas has committed to prepare an explosives transportation, handling and management plan that will meet or exceed applicable regulations.

Fire

The project site is and has been fire prone since before man first arrived. It has had numerous fires through the years including several during the last decade during MGII's tenure on the site. Impacts to the site are extensive with over 75% of the site impacted by previous fires (PRO, Executive Summary, p. ES-2MGII has always practices fire safety and management in its operations and has never been responsible for ignition of a fire on site after a decade of operations. Strict fire protection procedures have been used and are constantly evaluated for their effectiveness by MGII staff and by outside experts to ensure MGII staff, the forest and the public. All vehicles have had fire fighting equipment as a required part of their equipment portfolio. Since project inception and with Valley County and USFS permission the company placed spill and fire kits long all routes that company vehicles travel. This was not a requirement by any agency, but an action by Midas voluntarily to address the risk of spills or fire during routine traffic to and from the site. The PRO actually notes there will be fire-fighting support facilities on site (PRO, Section 8.12, p. 8-27) as a preventive and active measure along with procedures as outlined above. Mobile equipment and apparatus as well as water tanks and water would also be available for wildland firefighting, if requested by the appropriate authorities - an important consideration in this remote site

and for the nearby communities of Yellow Pine and Big Creek that both have and will continue to be threatened periodically by wildfires. The project site can more rapidly assist first responders than travel from the paved highways hours away in the case of a wildfire threatening these remote and poorly served communities.

Critical Minerals

The Stibnite site has a long and storied history as a producer of the Critical Materials tungsten and antimony. In fact, the town of Stibnite is named after the only ore of antimony, Stibnite and produced over 90% of the US needs of the metalloid during WWII and the Korean War, but even prior to that it was the largest producer of antimony starting in the 1930s in the State of Idaho and often in the entire US. IT produced more tungsten than any other operation in the US during WWII and was critical to the war effort since it was really the ONLY significant source of this metal during the early years of the war. Pursuant to the Executive Order, the Secretary of the Interior, in coordination with the Secretary of Defense, and with other relevant executive branch agencies developed and submitted a list of 35 minerals that are defined as critical to the nation's economy to the Federal Register on May 18, 2018 (83 FR 23295). That listing including antimony.

The project includes mining and processing of antimony-bearing gold ores and would produce antimony as a by-product. By-product production not an uncommon means of producing antimony throughout the world. Stibnite is a mineral that rarely occurs in economic concentrations and quantities and the site at Stibnite is a rarity because of its occurrence - in abundance. Historically China has been and still is the world's primary producer of antimony and uses its market control of the supply chain to further its political, military and economic interests around the world. The majority of the of the antimony upstream, midstream and downstream portions of the supply chain are either owned outright or controlled by the Chinese government. Their manipulation of the antimony markets has gone on for decades - at least since the 1930s. More than once the Chinese government's antimony market manipulation has led to World Trade

Organization litigation, and has included use of trade embargoes, export tariffs, nationalization and other restrictions to cripple foreign businesses or countries that rely on its supplies. In some cases they have purchased deposits and operations in other countries only to shut the operations down to ensure only Chinese businesses remain in control of the market. This is a threat to free market economics and due its importance in the munitions sector and in high tech military hardware is a threat to national security. Facilitating a new antimony-producing operation at Stibnite, done now in peacetime and when not at war under emergency conditions will allow for responsible development without the damages of hurried emergency development like that which occurred during WWII.

Stibnite was important to the US for many decades before, during and after WWII as an important source of antimony. The importance of the antimony reserves and resources at Stibnite are still important today as was noted in the September 10, 2020 addition of the project to the High Priority Infrastructure Project (HPIP) Permitting Dashboard - the first and only mine development project in the U.S. to be listed in this fashion. Information on HPIPs is published on the Council on Environmental Quality website and provides for enhanced coordination between federal agencies to get projects permitted and into operation in a timely and efficient manner, but still maintain requirement environmental protections. This listing should be impetus for the USFS to make sure this project gets through the rest of the permitting process in a timely and efficient manner.

References:

Federal Power Administration, 1930, Correspondence in Records of the USFS, Boise NF, Engineering Records, ca.1907-1975, RG 95, National Archives.