

Data Submitted (UTC 11): 9/11/2020 6:00:00 AM

First name: Glenna

Last name: McClure

Organization: City of Riggins

Title: Mayor

Comments: Dear Ms. Jackson:

The Riggins City Council has voted to approve the measures taken by the Stibnite Gold Project, with the understanding that the USFS will approve a project alternative that includes appropriate measures that will (1) prioritize the protection of surface water and groundwater quality, (2) prevent contamination of the Salmon River and its tributaries with toxic waste such as arsenic, mercury, cyanide or antimony, and most importantly, (3) provide adequate assurance that the tailing storage facility (TSF) will be designed and constructed so as to minimize the probability that it will fail (leak or breach).

There are risks inherent in any mining operation, and we have had a number of concerns raised by members of our community about the Stibnite Gold Project. After reviewing these concerns with Bob Crump, a local resident, retired Nuclear Physicist, and our appointed representative to the Stibnite Advisory Council, we have been assured that Alternative 2 addresses those concerns. Bob has ten years of experience as an Engineering Specialist performing probabilistic risk assessment (PRA) of nuclear power plants using tools such as fault tree analysis (FTA), accident sequence analysis (ASA), and failure mode and effects analysis (FMEA) while working at the National Engineering Laboratory in Idaho Falls and Gulf General Atomics in San Diego.

The lifeblood of our community is solely based upon recreational activities on the Salmon River thus the USFS and permitting agencies must assure the following:

1.0 Legacy tailings will be reprocessed to remove mercury, arsenic and antimony that are currently contaminating Meadow Creek. If Alternative 3 moves forward it would not allow that to happen.

2.0 Burnt Log Road will be utilized to keep truck traffic away from area streams as much as possible. Alternative 4 proposes traffic along Johnson Creek which would increase the risk of contamination if an accident were to occur which could impact important fisheries and the waters that flow through our community. Alternative 4 should not move forward.

3.0 Make sure risk assessment analyses are performed to assure that breaching of the TSF is an essentially impossible event and at the end of the project, impoundment is appropriately de-watered and stabilized and that any of the water generated during the tailings consolidation process is appropriately treated prior to discharge.

4.0 The TSF will be designed/constructed such that there is minimal probability of significant leakage of impounded contents to groundwater due to the two liners (each liner designed to have a half-life of 450 years), a leakage collection system between the liners, and an underlying bentonite clay barrier that will be laid down first Alternative 2 outlines the liners with thorough analysis.

5.0 Midas' ore processing will neutralize, stabilize or remove chemicals such as mercury, cyanide and arsenic as part of the processing cycle before any tailings material are deposited into the TSF, further reducing risk of impacting water quality.

6.0 If trucks transport toxic waste such as antimony concentrate through the City of Riggins, concentrate will be in appropriate enclosed containers (such as super sacks) to prevent dust emissions.

7.0 Midas' first priority will be the construction of the bypass tunnel so that anadromous fish and local fish populations will be able to access old spawning grounds after 80 years of no access.

8.0 With the new bonding requirements in place that Midas must bond for actual costs of reclamation, make sure those funds are set aside in bonds or trusts, do not allow corporate guarantees. Make sure Midas has no recourse but to restore the site after operations per the Stibnite Midas Gold modified PRO.

Thank you again for allowing the City of Riggins the opportunity to comment on such an important project for our region.