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Comments: I am reposting this since it did not show up as an attachment to our previously posted letter. These are our comments and questions resulting from our review of the DEIS.

Thank You

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TAILINGS TRANSPORT AND DISTRIBUTION

Other than a brief mention in section 2.3.5.7, Tailings Storage Facility or TSF, there is very little information included in the DEIS regarding tailings transport and distribution. In that section it is stated that the tailings will be pumped from the ore processing facility to the TSF. Due to the potentially contaminated and abrasive nature of tailings slurry this leads to a series of unanswered questions as detailed below.

Will the tailings pumps be located inside of a secondary containment in case of a failure or leak allowing tailings to escape to the surrounding area and potentially into waterways?

Due to the abrasive nature of the tailings will the pumps be rubber lined or have other types of anti-abrasive lining?

Because these pumps are typically high maintenance will there be redundant pumps installed in case of an unexpected failure?

What type of piping will be used for the tailings transport lines? For example, carbon steel pipe with rubber, HDPE or ceramic lining?

What type of connections will the tailings transport piping have, welded, flanged or another type of connection?

Will the tailings be pumped all the way to the discharge point into the TSF? If so what is the scheme for energy dispersion and erosion prevention at the discharge point?

If the tailings are not pumped to the discharge point what is the detail for the transition from pressure to the gravity flow distribution piping and the associated secondary containment measures for this installation?

If the tailings distribution piping around the TSF is gravity flow to the discharge points what type of piping will be used? Will the gravity flow line be rotated periodically due to abrasive wear in order to prevent wall thickness failure?

Will a program be implemented to monitor the degradation of the pipe lining due to abrasion in order to prevent unexpected failure and discharge?

Per Section 2.3.5.7 both the tailings delivery and reclaim water pipelines will be routed in a "geosynthetic-lined trench" as a form of secondary containment in the event of a pipeline failure. Since both of these lines will be operating under pressure what will prevent the trench from overflowing? Will the trench be sloped to one end or the other?

What type of "geosynthetic lining" will be used in the containment trench and what are its design characteristics? These questions are important due to the mining industry's numerous and well documented accidental discharges of tailings slurry into waterways and adjacent areas both in the US and around the world.

RECLAIM WATER SYSTEM

The same observations and concerns listed above for the tailings transport and distribution system also apply to the reclaim water system. They will both follow the same route and other than the abrasive nature of the tailings slurry pose some of the same environmental hazards. In addition the following questions apply to the reclaim water system.

Section 2.3.5.7, Tailings Storage Facility, states that an 8 foot high chain link fence will be installed around the TSF to prevent wildlife such as deer and elk from entering the impoundment area. What measures will be implemented to prevent waterfowl and other birds from landing in and around the supernatant pond and thus be contaminated or physically stuck in the tailings?

The fence will also not stop climbing and smaller animals from entering the impoundment area. What measures

will be implemented to prevent these animals from entering and thus becoming contaminated and/or stuck in the tailings?

These same concerns apply to the tailings pipeline maintenance pond and any other ponds containing reclaim water or tailings.

SUMMARY

These two systems both have a high potential to negatively effect the environment. This is due to the fact that they are over land conveyance systems under pressure which carry potentially contaminated and toxic materials. Furthermore, as mentioned previously, the mining industry as a whole does not have a good track record regarding accidental spills from these type of installations. Therefore, more attention should be given to their design and preventive/maintenance details in the DEIS.

TAILINGS STORAGE FACILITY

The tailings storage facility represents one of the most serious environment risks posed by the project. Equally important is the fact that it poses the most long term risk in that it, at least in theory, it will exist in perpetuity. Given the importance of the magnitude of the risk represented by this facility there is surprising little detail included in the DEIS for it's design, construction, operation and long term maintenance. Two relatively recent incidents of tailings dam or "embankment " failures in the mining industry serve to highlight the risk involved in this type of installation. The first incident is the failure tailings dam in 2014 at the Mount Polley mine in British Columbia which severely impacted downstream waterways, lakes and the surrounding environment and wildlife. The second example is the Brumadinho dam failure in 2019 in Brazil in which 259 people lost their lives and significant damage was done to downstream waterways, the environment and wildlife. Both of these examples obviously also have untold and unquantified socioeconomic impacts. Section 2.3.5.7, Tailings Storage Facility, contains only a brief description of the facility and embankment along with a very basic drawing in Figure 2.3-5. This leads to, at a minimum, the following general comments and observations.

Due to the environmental criticality of this installation the DEIS should contain significantly more detail for it's conceptual design. For example what is the basic design criteria for the embankment design including backfill material characteristics and compaction requirements for both the starter embankment and future stages? Why do Alternatives 1, 2 and 3 not include a design that complies with current Idaho regulatory requirements such as is the case with Alternative 4? Is there reason for Midas or the Forest Service to believe that these regulations will be relaxed by IDEQ and if so why?

Given the potential for damage to the groundwater, surface runoff, waterways and surrounding environment represented by this facility would not all Alternatives merit the secondary liner and leak detection system included in Alternative 2?

Will future stages of the TSF embankment include the buttress of "development rock" or only the starter embankment?

Is it anticipated that the tailings itself will be used in raising the embankment height in the future? If so is this based on bench testing of the geotechnical characteristics of the tailings?

Section 2.3.5.7 states that the TSF will be surrounded by an 8 foot high chain link fence "designed to keep wildlife, such as deer and elk, from entering the impoundment area". Since this fence will obviously not be effective for burrowing and climbing animals what provisions will be made to prevent these type animals from entering and becoming contaminated and/or stuck in the tailings?

The same question as above would apply to all birds especially waterfowl that would be particularly attracted to the supernatant pond.

Current life of mine is estimated to be less than 15 years. Since there is ongoing exploration being done at the site there is obviously the possibility of a longer future life of mine. What provisions, if any, have been made for what could become a much larger/higher TSF?

CAMPS AND ASSOCIATED INFRASTRUCTURE.

The DEIS does not appear to include a clear and detailed plan for temporary construction camps. This is an important factor due to the obvious environmental impact of housing up to 1000 personnel or more at site for 3

years.

There are inconsistencies and omissions throughout the documents even where there are limited references to construction camps. For example in section 2.3.4.1, Overview, it states that "Midas would install 15 to 20 temporary trailers on private lands adjacent to the existing exploration camp to accommodate construction crews". 15 to 20 trailers will not come close to housing 1000 personnel. There are references in both the Midas Prefeasibility Study and the Midas Plan Of Restoration And Operations where they state that the existing exploration camp which houses 60 people will be relocated and expanded to house the construction workforce and then downsized for use during the operations phase. However, they also state that the expanded exploration camp will be used until the "Stibnite Lodge" is completed which will house Midas employees and contractors.

There are references in section 2.3.4.1, Overview, to 3 construction camps consisting of trailers located at borrow sources, again, with very little detail regarding capacity and required utilities including the necessary water and sewer. There is also a statement in this section that some of the construction workers will be housed in the city of Cascade. This is further evidence of the lack of planning given to employee housing during construction. Having employees commute To and from Cascade to the site everyday does not make sense given the distance and risk involved.

SEWER AND WATER FOR CAMPS

As is the case with an over-all camp plan there is insufficient information and no detail plan included in the DEIS for providing potable water and to manage sewage for the camps including cooking, bathroom and laundry facilities. Section 2.3.5.10, Sanitary Waste Handling Facilities, simply states that there will be on site facilities constructed and operated in accordance with Valley County, IDEQ and Idaho DHHS.

Section 2.3.4.1, Overview, indicates that the existing sewage treatment plant at the exploration camp will be used/expanded during construction. There seems to be little or no information available in the DEIS regarding this existing treatment plant. For example, what is the capacity, where is the effluent discharged and how is it tested? The plant apparently handles 60 people currently, upgrading to handle 1000 seems to be more than just an expansion.

There are numerous references in the documents to the use of portable toilets during construction. There should be some detail provided that addresses how these portable facilities will be managed. For example, given their nature these facilities will have to be pumped out regularly and the raw sewage hauled somewhere for treatment and disposal. Where will these sewage trucks be discharging their loads. At the expanded exploration camp treatment plant or will it be hauled off site and if so to where? To the already overtaxed McCall or Cascade treatment plants?

According to section 4.18.2.1.1.5, Groundwater Quality, "There are no active domestic groundwater wells used for residential drinking water within 15 miles of the mine site". Where does Midas currently get the potable water for the exploration camp? Is it hauled in and if so from where and how is it monitored? Providing potable/drinking water for a workforce of 1000 and the associated cooking, bathroom and laundry facilities merits a plan for how it will be managed and what local resources are impacted. Water in general for this project is going to be a very important issue therefore even for camp usage it merits detail planning and management.

SUMMARY

The subject of camps and their associated infrastructure is always an important factor for any project like the Stibnite Gold Project not just for the success of the project but also for its impact on the environment. 1000 or more people living in a camp will obviously use a significant amount of water and generate significant amounts of sewage and other domestic waste. If not properly planned and monitored the sewage alone can pose a very real threat to both the surrounding environment and waterways but also to the health and safety of the employees. The success of similar projects around the world has been negatively impacted along with the health, safety and wellbeing of their employees and neighboring communities as a result of insufficient planning and management of the camp facilities. This is not only a concern based on the review of the DEIS documents but also the review of other documents generated by Midas such as the Prefeasibility Study and Plan Of Restoration And Operations.

INFRASTRUCTURE WATER AND SEWAGE SERVICE

Although there are several sections of the DEIS which reference employee housing and other facilities there does not appear to be an overall plan for either the construction or operation phase. It is important to note that during the peak of the construction phase there will be a population living on site at least equal to the population of the city of Cascade, approximately 1000, for a period of roughly 3 years. During the operation phase the population will be approximately half that of the city of Cascade for up to 15 years and possibly much longer. While comments and observations have been previously included regarding construction camps the following omissions and inconsistencies need to be addressed in the context of an over-all site temporary and permanent infrastructure plan.

Potable/drinking water: While table 2.3.5 specifies the estimated amount of potable water required for both construction and operation there is no clear plan for where this water will come from. Section ES.12 states that Midas will develop a water supply system that furnishes potable water. Section 2.3.4.2, Overview, states that "the existing potable water supply system at the exploration camp would be used and expand for the construction camp" which means going from 60 to 1000 people. This section also mentions "supplemental water source" by way of "deliveries". Section 4.18.2.1.1.5 states "there are no active domestic groundwater wells used for residential drinking water within 15 miles of the mine site".

What is the detailed short term and long term plan for the supply of potable water to all on-site facilities including camps, kitchens, laundries, offices, shops and warehouses?

How will drinking water be supplied to workers at the work front both during construction and operations?

How will the quality of potable water be monitored, tested and verified during all phases of the project? This must also include deliveries of potable water from outside sources.

Sewage treatment and disposal: The same observations mentioned above for potable/drinking water apply to sewage treatment and disposal, ie the requirement will be at least equivalent to the city of Cascade for several years. Section 2.3.5.10, Sanitary Waste Handling Facilities, merely states that sanitary waste handling facilities will be present at the site and operated in accordance with local and State standards. There are references in section 2.3.4.1, Overview, that the existing exploration camp treatment facility will be expanded and that portable facilities will be located around the site. None of this constitutes an adequate plan to deal with the quantity of sewage and waste water that will be generated at the site.

What is the detailed plan for short term and long term management of sewage and residential wastewater that will be generated on site?

The Midas Gold Prefeasibility Study Technical Report states in section 18.8, Sanitary Waste Management, that packaged sewage treatment facilities will be installed and connected to "leach fields". This seems impractical for the quantity that will likely be generated. Was this addressed and reviewed in the DEIS and if so where in the documents?

If leach fields are not used where will the sewage effluent be discharged?

How will the sewage effluent be monitored and tested before being discharged or disposed of?

If a portion of the sewage will be hauled off site to a municipal plant for treatment and disposal is there an agreement in place with this plant?

MAINTENANCE AND REPAIR SHOPS

Other than a few brief mentions such as in section 2.3.5.8 very little detail could be found in the DEIS regarding maintenance and repair shops either for the construction or operations phase. Due to the large equipment and vehicle fleets anticipated to be required during both construction and operations there is a potential for serious environmental impacts due to improper disposal or accidental spills of petroleum products, solvents and other chemicals during the life of the project. Therefore the following omissions and questions should be addressed.

Equipment wash facilities: Section 2.3.5.8, Mine Support Infrastructure, states a truck wash facility will be installed with an oil/water separation system for the mine fleet.

Will a similar facility be installed for the construction fleet?

Will the recovered water from the separation process be used for other purposes? If so how will the water be tested/treated before reuse?

How will the recovered oil be disposed of and where?

What type of containment will be installed around these facilities?

What contingency plans will be put in place for decontamination of equipment or vehicles that may unexpectedly come in contact with hazardous substances from previous mining operations?

Maintenance shops: Both the mine and construction equipment and vehicle fleets will require significant installations for routine maintenance and repairs. There is very little detail provided in the DEIS regarding these facilities.

How and where will spent petroleum products and other maintenance items be disposed of?

What type of spill containment will be provided at these facilities?

How and where will spent tires especially from the mine haul trucks be disposed of?

How will the routine maintenance be conducted and contained for large equipment such as cranes and shovels that are too large to move to shops requiring maintenance to be done in the field?

Other shops: There will likely be several small maintenance and fabrication shops scattered around the site especially during the construction and start up phase.

At least a preliminary plan should be included in the DEIS identifying the location and purpose of all shop facilities.

What type of specialty shops and installations are expected during construction and startup? Will nuclear testing equipment be used on site?

Will any other specialty hazardous materials be used on site during construction and started up such as transformer oils or specialty gases and liquids?

Fuel storage and depots: Both during construction and operation there will be a very significant amount of diesel fuel and gasoline stored and used on site.

Will the permanent fuel depots be installed early on site for use during construction or will temporary and mobile services be used?

Are there any underground or above ground fuel distribution pipelines anticipated for the construction or operation phase?

As with the other on-site facilities at least a preliminary plan should be submitted with the DEIS showing the location of fuel storage and distribution depots especially relevant to waterways, wetlands and other environmentally sensitive areas.

Spill containment and mitigation plans should also be included for all fuel storage and distribution depots.

SUMMARY

Based on review of the DEIS and associated documents it would appear that insufficient attention has been given to on-site infrastructure facilities and the potential for environmental impacts caused by these facilities. As stated above, at a minimum the DEIS should include at least a preliminary infrastructure plan.

COMMUNITY IMPACTS

OVERVIEW

Due to the limited amount of time allowed for the review and comment on the DEIS relative to the sheer volume of information involved, comments for several topics are combined and condensed under this heading, "Community Impacts". This is unfortunate since the Stibnite Gold Project will undoubtedly have wide ranging negative effects on day to day life for the residents of all nearby communities. Midas Gold has spent significant amounts of money and effort to downplay these negative effects and highlight the positive effects both in the local, state and national media as well as with our politicians. They have also spent a great deal of effort to engage in the local communities to promote an image of Midas as being a caring and responsible member of the community. The result of that effort is that the majority of the local and general population who will not have reviewed the DEIS and have no knowledge or experience in the mining industry will have a distorted view of what this project will mean to their lives if in fact it goes forward.

TRAFFIC AND TRANSPORTATION

Throughout the DEIS there are various references and sections dedicated to the topic of roads, access, traffic and transportation. The fact that the project site is located in a high use recreational area combined with the increase in tourism in Valley County should highlight the importance of this subject. This reviewer is certainly not

an expert on traffic and transportation and can only hope that there are experts reviewing and commenting on this aspect of the DEIS. However, it is common knowledge that people come from all around the State as well as from other states to enjoy and recreate in this part of Idaho. Adding the complexity of a large construction project and then an operating mine to this high use recreation and tourism area leads to many questions and concerns. State Highway 55 is already a heavily used corridor from the population centers to Valley County for recreation and tourism. Recent growth in the city of Boise and its surrounding area have further added to this usage resulting in more congestion and traffic accidents. Add to this a 3 year construction project with a workforce of at least 1000 plus the deliveries that will be required and the impact to local traffic will likely be very significant. The same will be true to a somewhat lesser extent during the mine operation phase of at least 3 years.

Midas Gold recently received approval by Valley County to establish an off site logistics facility in the Scott Valley. Part of the purpose of this facility according to Midas is to minimize traffic impacts during construction and operations. Although it will likely accomplish that goal on Warm Lake Road and the remainder of the route from the facility to the mine site by consolidating personnel on busses, it will have little to no effect on the additional traffic in the local communities and a Highway 55. This is especially true in the city of Cascade through which it is estimated that 2/3 of the mine traffic will pass.

Given the above facts it would seem that a facility located south of Cascade and possibly a second facility north of McCall or on the bypass where employees could be consolidated on busses and personal vehicles parked would make far more sense. Freight deliveries could also be consolidated at these locations. This should help mitigate the impact to traffic congestion in these communities and the Valley in general.

Closer to the mine site the interaction between recreational traffic and construction/ operations traffic will certainly pose a variety of problems from dust control to responsibility for road maintenance and emergency response.

Due to the the normally heavy snowfall and avalanche risk during the winter a detailed winter traffic plan will need to be developed including a responsibility matrix for Midas Gold, Valley County and the Forest Service.

What has been done to date by Midas Gold and the responsible agencies to bring some clarity to these issues?

LOCAL EMPLOYMENT

Midas Gold has made much of the project bringing local jobs to Valley County both for the construction phase and also for the operations phase. The reality is that of the approximately 1000 construction jobs the vast majority will go to people from outside the area. Valley County simply does not have the amount of qualified concrete workers, equipment operators, iron workers, welders, pipe fitters, electricians and supervision to staff the project during construction. Therefore the bulk of the workforce will come from population centers outside the area such as Boise and cities in the the surrounding states. This will result in several areas of concern including at a minimum the following.

The jobs that will go to locals will be service jobs such as for lower skilled work and administration. This will likely cause a large disparity in wages which will disrupt the local labor market and cause local resentment.

The demand, even though smaller than Midas suggests for local labor, and the wage disparity will likely make it difficult for local businesses to hire and retain personnel.

Midas Gold, amongst other actions, will need to conduct a labor survey and develop a labor contingency plan. It is not clear in the DEIS if anything has been done in this regard. Is there more information available regarding this issue?

Midas has stated that they will conduct craft training. Has a plan been develop for this training?

OTHER COMMUNITY IMPACTS

While the DEIS contains a great deal of information and data the sheer size of it combined with the way it is organized makes it very difficult to review and arrive at meaningful conclusions in the limited time available. This is especially true of the community, cultural and socioeconomic issues. Following are some of the more obvious concerns and comments.

Although the majority of the project workforce will reside at the mine site there will still be a great deal of interaction with the local communities. This will impact all local services including, police, medical, emergency response and road maintenance. What planning has been done by Midas Gold and the local authorities to plan for these impacts?

Valley County has been through the boom and bust cycle previously with the Tamarack Resort failure. What assurance do local businesses and residents have that this won't happen with the Stibnite Gold Project?

All information provided to date by Midas Gold and by the DEIS indicates a life of mine cycle of 12 years. Is Midas Gold continuing exploration at the site now? If exploration indicates a larger ore body at the site is it projected that the mine will continue to operate after the current 12 year estimate? If so it would appear that the community is being misled and should be informed of this possibility.

SUMMARY

In addition to the above concerns there is the less tangible impact of the loss of local lifestyle and culture that will inevitably occur if the mine goes forward. Midas Gold has conducted an intense and sophisticated PR campaign to convince the local residents that if the mine goes forward that the net effect will be positive for the environment and the community. Unfortunately this is likely far from the truth and anyone that has any experience with mining or has actually reviewed the DEIS can see it. If the project does go forward we can only hope the Forest Service and other responsible agencies will hold Midas Gold accountable for their commitments and responsibilities and at least minimize the negative impact on our State and our home.