

Data Submitted (UTC 11): 10/28/2020 1:58:16 AM

First name: Nancy

Last name: Richter

Organization:

Title:

Comments: To Whom it May Concern:

My name is Nancy Richter. I have been employed in the minerals industry for over 25 years, as an Exploration and Mine Geologist, spanning from 1986 until 2020. I am knowledgeable about mine development, mine operations and modern mining industry standards as well as the geology and mining history of the Stibnite area. I was also a resident and business owner in Yellow Pine from 1996 to 2003 and continue to own property with my daughter in the immediate area. I have reviewed the Pre-feasibility report and Draft EIS from the position of having been employed by the mining industry as well as from the perspective of an area property owner with concerns about the potential environmental impact of the project. I support Midas Gold's Alternative 2 proposal to mine at Stibnite but feel there remain some issues where further mitigation should be considered.

Midas Gold's engagement with community ("community" used in the broadest sense to include local, county, state, and federal stakeholders) has been exemplary. I believe this is an indication of their commitment to ensure the project going forward is operated in the best interest of the various communities as well as the company. Their commitment to spend over \$1B to develop the project will result in hundreds of high paying jobs (by area standards) and will boost the overall economy of rural Idaho significantly.

Midas Gold's plan to mitigate their environmental impact to the immediate mine area includes reclamation, reforestation, remediation of the historic tailings, restoration of the fish passing and moving historic waste rock to an engineered waste rock storage facility. Their plan to conduct reclamation concurrent with mining will result in improved environmental conditions both early in the project development and after mining has ceased.

I do have several concerns which I felt were not addressed adequately. These relate to ingress/egress, environmental impact to local community, insufficient condemnation drilling and insufficient bonding.

Ingress/Egress

Who is responsible for maintaining the paved road from Cascade to the Johnson Creek Road/Burnt Log cut-off? Is there a plan to upgrade to the road from Warm Lake to Landmark? There is significant potential for run-away truck accidents traveling down the gradient from Landmark, westward to Warm Lake. What mitigating efforts are planned to address this danger to the public? Is it possible to schedule supply convoys with pilot vehicles outside normal commuting hours? Or limit sections of the road to one-way traffic during times convoys would be scheduled?

The use of pilot cars is loosely mentioned in Appendix D of the Draft EIS, see FS-75 which mentions use of pilot cars during mobilization/demobilization "as appropriate". This verbiage should be more specific. Furthermore, there is no mention of use of pilot cars when transporting hazardous materials or large loads. This may be stipulated by Idaho Department of Transportation but because safe transportation of toxics (diesel, gas, lime, cyanide, ammonium nitrate to mention a few) through rugged terrain and avalanche prone areas may negatively impact the environment, it deserves a reference in the Draft EIS.

It is unclear on the proposed site maps whether the public can continue to access the Cinnabar and Thunder Mountain areas through the mine site. It is also unclear if the road from Yellow Pine to Stibnite will be plowed in the winter. If it is, there should be a large parking area established at the Big Creek turn-off for snowmobile parking. Furthermore, plowing from the South Fork to Johnson Creek and on to the Burnt Log cut-off will ensure loss of snowmobile access from Warm Lake to Landmark and down Johnson Creek. Although the economic benefit of snowmobilers on the community of Yellow Pine is highly variable, it will become zero due to plowing. Is there a plan to mitigate this?

Environmental Impact to Local Community

The PFS report notes 'the Owner's Team will be housed in YP' during construction however, there is no indication of how many people this will be. After construction, the plan is that Midas employees and contract workforce will live in Cascade and at the mine camp. When asked about impact to Yellow Pine's population, Midas has said their employees won't have much impact on Yellow Pine. The reality will be the same as that which the community experienced each time there was mining activity at Stibnite; there will be an impact on the

population of Yellow Pine. It is unavoidable. Workers brought into the area will chose to stay, there will be an influx of families who want to be closer to their place of employment (or their spouses place of employment), particularly during the summer months, managers based out of Cascade will grow weary of the commute, there will be insufficient single occupancy rooms at the camp. Midas may try to mandate their employees not commute from Yellow Pine but there is a serious shortage of experienced mine personnel in the industry and it is likely Midas will have to give in a bit to accommodate those workers. The reality will not be aligned with Midas' current plan. The existing water system is in a state of disrepair and is inadequate for growth in the population of Yellow Pine. To mitigate this bottleneck, I would like to see Midas mitigate this impact by upgrading the community's water system.

The assay lab for the mine is planned to be in Cascade. The single greatest generator of hazardous waste for a mine is the assay lab. What is the plan to handle all the lead and mercury laden waste that will be generated by the lab?

Insufficient Condemnation Drilling

Regarding the site layout, the pre-feasibility stated that Midas drilled 4 condemnation holes. I do not know how many other holes of sufficient depth have been drilled to condemn areas where infrastructure is going to be placed but 4 holes is completely inadequate, given the small footprint of the known mineral deposits. Due to the tight constraints on where infrastructure can be placed, the condemnation drilling should be adequate to ensure areas with planned infrastructure are devoid of potentially economic mineralization. Rising metal prices can turn waste rock into ore during a mine life, playing into this problem. Exploration continues after mining has begun. It is not uncommon for mine infrastructure to be too close to mineralization when condemnation is inadequate.

This would necessitate moving facilities and cause unplanned disturbance.

Reclamation Bond

Because the price of metal commodities fluctuates, the project economics will be constantly changing.

Processing costs for sulfide ore, which constitutes the bulk of the mineral resource and reserve, is higher than oxide ore and will be more sensitive to a drop in metals price. The cut-off grade reported in the PFS is quite low. There is a risk of closure before the planned life of mine is reached and closure completed. To mitigate this risk, the bond posted should be, at a minimum, sufficient to cover the cost of all disturbance created by Midas, including dismantling infrastructure, and not be limited by the government mandated amount which would most likely be inadequate.

I appreciate the opportunity to provide comment on the Draft EIS and Midas Gold's Stibnite Mine proposal. As stated up above, I am in support of alternative 2 but feel there remain some issues where further mitigation should be considered.

Thank you,
Nancy Richter