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First name: Natalie

Last name: Podgorski

Organization:

Title:

Comments: Dear Ms. Jackson,

Thank you for the opportunity to participate in the public comment period and submit a comment on the Stibnite Gold Project. Over the last six years, I have had the opportunity to work with Midas Gold Idaho as a contractor. When I first started working with the company's community relations team, I was admittedly skeptical. I was one of the people who was worried the Stibnite Gold Project was too good to be true. However, the more I worked with the team, the more I saw how committed they are to Idaho and developing a mining project that can truly work in harmony with the environment.

Through my first-hand experiences with the team, and after reviewing the Draft Environmental Impact Statement, I believe Alternative 2 presents the best opportunity for our state moving forward. After Midas Gold Idaho submitted its initial Plan of Restoration and Operations in 2016, the company continued to seek feedback from the community and look for ways to improve the plan. During this time, Midas Gold Idaho brought more than 190 tours up to the site and gave more than 900 community presentations. This time was invaluable and deeply influenced the team's work on Alternative 2. Feedback from the community helped Midas Gold reduce the project footprint, and therefore its impacts, increase access for recreationalists, reduce traffic on the roadways, decrease impacts on wetlands and further prioritize restoration activities. I am hopeful that the company will be able to make further refinements to the plan using the comments collecting during this comment period.

If Alternative 3 or 4 was selected, not only would the project be delayed for additional two years, I worry there would be adverse impacts to the environment as compared to what is outlined in Alternative 2. Alternative 3 would relocate the tailings storage facility to a pristine reach of the East Fork of the South Fork of the Salmon River. This would increase surface disturbances at the site and leave the existing spent ore disposal area as it is today. This means some of the potential benefits to surface and ground water proposed by Midas Gold in Alternative 2 may not be fully recognized. Midas Gold Idaho gave careful consideration on the safest way to travel to site. The team specifically proposed the Burntlog Route because it avoided important waterways and reduced stream crossings. Under Alternative 4 mine traffic would utilize Johnson Creek Road and Stibnite Road. Traffic would parallel waterways that are important to fish. This increases the risk of potential spills and sedimentation in the river. While I understand a No Action Alternative must always be presented, I truly hope we do not let the opportunity to clean up a brownfield site, put hundreds of Idahoans to work and secure our nation's only domestically mined source of antimony pass us by.

Right now, our foreign relations with China continue to be tenuous. They are our top supplier of antimony. If China cut off our access to this critical mineral it could have devastating impacts to our economy, national security and technological advancements. The Stibnite Gold Project can help America secure our mineral future and develop a strong supply chain here at home. It also offers us the opportunity to control the environmental and ethical standards surrounding how we source antimony. We can push mining offshore but no country has as stringent mining regulations as the U.S. I would rather see projects move forward in America, where we can set controls and make sure companies are meeting the necessary requirements to protect the environment.

In order for the Stibnite Gold Project to move forward, the company must prove it can mitigate any impacts to the environment. Reviewing the DEIS I believe Alternative 2 exceeds this threshold. According to your agency's own analysis in the DEIS, Midas Gold's offered and required mitigation and restoration efforts will address the impacts at site. Midas Gold's mitigation plans offer a 40% increase in wetland functional units compared to the conditions that exist today (DEIS Appendix D, CMP Table 8-2) and restoration plans will provide a net gain of 21,941 stream functional units (DEIS Appendix D, Table 8-1). Without the private investment of Midas Gold, the site will never

recognize these benefits and instead the legacy impacts will continue to fester.

Today, salmon are blocked from their native spawning grounds by the abandoned Yellow Pine pit. It has been this way for more than 80 years. I want to see fish be able to move freely back to the headwaters of the Salmon River, especially when the DEIS shows restoring fish migration in the East Fork of the South Fork of the Salmon River will assist fish populations. Specifically, 4.12-33 concluded long-term access to historically blocked habitat will result in increased productivity and improve genetic diversity for fish populations, including chinook and steelhead salmon and bull trout.

Water quality is also a problem at the site. Arsenic and antimony levels in the ground and surface water far exceed human health and aquatic standards. This is in large part due to the fact that 10.5 million pounds of mine waste are currently laying in the valley floor at site unconstrained. If Midas Gold is allowed to move forward, the company will remove this legacy waste, reprocess it and properly store it for the future. Section 4.9 of the DEIS concludes removing legacy waste and managing water would provide long-term reduction in metal loading in the ground and surface water. The East Fork of the South Fork of the Salmon River has been contaminated for far too long. It is time to clean it up.

It is clear the site needs environmental attention. Midas Gold Idaho is offering our state the opportunity to clean up this long, neglected part of Idaho's backcountry and take the burden off of taxpayers. The Stibnite Gold Project is so remote. For years, it seems we've been comfortable living by the mentality of out of sight, out of mind. But enough is enough. Now that I've seen the site for myself and learned about the problems, I am no longer comfortable leaving it and hoping this historic mining district will miraculously heal itself. That hasn't worked so far and we have no evidence it ever will.

Mining operations and restoration at Stibnite will also provide hundreds of family-wage jobs in rural Idaho. During operations, Midas Gold projects annual payroll would range between \$48 million to \$51 million. It is incredibly important we look for ways to stabilize and diversify our state's economy as we all face the extreme economic uncertainty brought on by the pandemic. Especially since COVID-19 has shown us how fragile an economy built around tourism, or any one single industry, can be.

Already, Midas Gold has spent more than \$69 million in Idaho by working with local vendors, suppliers and contractors, like me. The company has committed to hire and purchase locally whenever possible, so the economic benefits can stay within our state. According to the company, the Stibnite Gold Project will create roughly \$150 million in sales transactions in the regional economy over the life of the project. Midas Gold would also be required to pay hundreds of millions in federal corporate income taxes and \$86 million in state corporate income taxes. This tax revenue will help support our state's rural communities.

I may have once been skeptical about the Stibnite Gold Project but, as you can tell, I now believe strongly in Midas Gold's plans for the future and believe Alternative 2 is our best hope for putting rural Idaho to work, securing a strong American supply of antimony and finally providing the resources needed to restore the historical Stibnite Mining District.

Thank you for your thoughtful review of the Stibnite Gold Project. I appreciate the consideration of my comments as you weigh your decision.

Sincerely,

Natalie Podgorski