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Comments: I value opportunity to offer thoughts on The Stibnite Gold Project. It's important for people to be engaged in topics that may affect them. Notably when possibility exists for impact over immense waterways and landmass, fish and wildlife, large populations, varying cultures, and 100 year durations. When people of different knowledge, experiences, and positions collaborate wholly, or disagree in earnest, balanced results can be produced, and should be readily evident.

There's a struggle with the probability of a major mining operation in the headwaters of the South Fork of the Salmon River. At full production 20,000-25,000 tons per day, and 100 million tons of ore processed over life of mine is major operation. It's important to note that the mining operation is aligned with the extensive resources needed to cleanup and restore an existing brownfield site. As the last several decades are proof of, it's going to take a committed and wellorganized, well-funded private sector operator to correct the issues within and around Stibnite.

I'm employed in an Idaho commercial enterprise of long standing. Projects within the workplace include supply, delivery and periodic site work for mine operators. Lower 48 mine sites are extensive, over 50. Still more in Canada, Alaska and off-shore. There is a fair understanding of the mining industry from a supply chain standing. I see plausibility, opportunity, responsibility, and challenges within the project.

The comment- If it can't be grown, it must be mined, is relevant. Raw minerals are a foundation for technology, and countless other essential US industries. Gold and silver are utilized in advanced technologies, the medical world, manufacturing and more. Antimony was crucial to our military's effectiveness during World War 11, into the Korean War and still is today, along with continuing commercial applications.

Mining contributes heavily to all three areas of economic activity- Primary (raw minerals), Secondary (manufacturing), and Tertiary (service). Minerals are the building blocks of manufacturing. Manufacturing generates more economic activity than any other sector. For every manufacturing job, there are 3 plus jobs created in non-manufacturing industries. For every dollar of domestic manufacturing, more than three dollars of economic activity is generated, valueadded. Mining is a key aspect of economic stability and national security.

I suppose arguable, it can be discerned though that mining is likely Idaho's first major industry. The industry is a tenured family wage jobs creator, it's imbedded in the economies of Idaho and several other states, representing about \$1 billion in Idaho's annual gross domestic product. There is a jobs multiplier aspect within the Midas Gold proposal. Its estimated by independent third party analysis that .878 indirect jobs will be created for every direct job during the operating period of the mine. In my world it's reasonable to appreciate, and support responsible mining practices. It's worth note that Idaho's Surface Mining Act started approximately 1971, went mostly unchanged for 50 years. 2018 Idaho House Bill 141 was passed, that through outreach ofThe Idaho Mining Association's (IMA) pursuit of maintaining viability within the industry, and involvement, advocacy of Midas Gold.

I have followed the journey of Midas Gold since 2011. At that time they were calling it The Golden Meadows Project, were focused on the continued definition and expansion of the existing mineral resources estimates, to be included in the preliminary economic assessment. Exploratory drilling then included the Hanger Flats and Yellow Pine deposits. A front page picture headline in the Star-News on March 15 2012, Midas Gold President Stephen Quin, A QUOTE "It's a significant deposit on a world scale". END OF QUOTE. The picture adjoined a supportive article by Dan Gallagher, titled A Fresh Prospective. Within the article, A QUOTE "You're in less than 2-3 percent of the deposits in the world," END OF QUOTE, Quin said. An associated article by Gallagher same date headlined When looking for gold, the more you drill, the more you know offered in part- A QUOTE "Midas

spent \$24 million in 2011 doing exploring in the Stibnite area and had a budget of \$37 million heading into the new year." END OF QUOTE.

More recent considerations-1) As Per Idaho Commerce news release May 17, 2017 Midas Gold was one of two Idaho recipients of the Corporate Investment and Community Impact Award (CiCi) From Trade and Industry Development" Having made significant impact on, and contribution to, their community, including re-vitalizing their local area and providing meaningful, needed jobs." 2) From start of exploration through March 2020 Midas Gold has invested over \$221 million in the Stibnite project. 3) Same timeframe they have spent almost \$86 million in Idaho, keeping the money working at home, purchasing goods and services from local outlets. 4) They have given hundreds of public presentations since 2015, and taken nearly 1900 people on 192 informational tours of the project. 5) They have donated more than 1,800 coats, gloves and scarves to local kids in need. 6) They have worked with Idaho dairy farmers, partnering to convert unsold milk into cheese and butter product, and donating it to food banks in Cascade, Council, Donnelly, New Meadows and Riggins.

Midas Gold has endured heavy scrutiny over a lengthy period, they have adjustments through time and kept moving forward. Through public interaction, innovative leadership and cleverness too, they have come a long way against very tall odds. They have already commenced site cleaning and restoration, hauled off existing scrap and other debris. They locally sourced and planted nearly 60,000 thousand trees.

Responsible mining operations are a spring-board for interwoven commercial exchange, solid source tax revenue, prosperous careers, and giving back. Many of these salt of the earth workers earn nearly \$100,000 annually. Midas Gold kicked off their non-profit Stibnite Foundation in 2019, an extension of their previously proven record of giving. Newmont's Legacy Fund kicked off in 2010. A charitable event for Newmont employees, where they can give to any nonprofit of their choice. Newmont will match dollar for dollar- No limit to size of contributions. 2011 Newmont employees donated \$650,000.

I offer two extracts from an Elko Daily News an article by Tim Burmeister May 14, 2019 including (paraphrasing) 1) There was a 5 year period in which 70% of Newmont employees donated to the campaign. 2) In 2019 74% of their Nevada employees pledged approximate \$1.34 million, with Newmont matching, the fund totaled nearly \$2.7 million. April 9th, 2020 Newmont announced the establishment of a US \$20 million fund to help host communities, governments and employees combat the Covid-19 pandemic. For a solid sourced look into the mining industry I offer The Idaho Mining Association, the Nevada Mining Association, The Wyoming Mining Association, The New Mexico Mining Association, and The Mining Record which is a 131 year publication based in Castle Rock CO. The Elko Daily News, and The Mining Quarterly, which is published four time annually, both based in Elko, Nevada. I applaud the workers, and long successful operations of many mine operators including Newmont, Barrick and Coeur Rochester, their community investment and on-going philanthropy. Midas Gold is already engaged, appears more than capable of many similar successes.

Midas Gold claims probable reserves of gold 4-5 million ounces, silver 6-7 million ounces and antimony 100-200 million pounds. The 2014 pre-feasibility studies were encompassed by a then market rate of approx. \$1,100 which is roughly half of today's approx. \$1,950. Payback was estimated near 3 [frac12] years, and life of mine estimated at 12 years, or 20 years including clean up, construction, operation, closure, and reclamation. It appears there is substantial operating buffer, likely resources for effective clean-up, and extensive reclamation. Those values attract big investors, and possible buyers.

Idaho's mountain landscape naturally dictates routes of travel many times presenting heavy challenge or outright closure. Heavy snow, avalanches, iced terrain, massive drifts, rapid thaw, blow outs, mud slides, rockfall and floods have all been encountered throughout the area. Any of the routes traveled to and from, and mine operational sites have an element of remoteness. Midas Gold has experienced and worked through many of these things to date, albeit not within mine production perimeters.

Challenging calendar periods or adverse weather patterns adds to the equation. Air service and medical evac included. There are times non-flyable conditions are lengthy in the back country, fixed wing or other. As miners, first responders, safety administrators or insurance agents know- Any single source ingress and egress can be a bad thing. Alternative 2 allows for secondary route in and out of Stibnite, an enhancement to safety and operations. I offer two paperback books for historical reference, 83 Miles of Hell, The Stibnite Ore Hall-1942-1952 and Valley County, The Way It Was. Both books by Duane L. Petersen. For those time constrained, there are numerous captioned pictures.

A successful project would be a great thing for Idaho, and would set a higher bar for operations and reclamation throughout the mining industry. If not successful overall, could become an ecological train wreck. The Financial Assurance Plan (FAP) is presented to address that situation. It's refreshing to read and hear the FAP covers long term obligations on site including reclamation, enhancement and restoration. That it uses site specific data, has component by component layout, has contingency provision, will be adjusted at least once every 5 years, and has been utilized at large Nevada mines. The Stibnite operation would be similar to many Nevada mining operations, dis-similar in some important aspects such as there is no heap leaching planned, and the landscape of northern Nevada and Valley County. Nevada mines don't border critical Salmon, Steelhead and threatened Bull Trout habitat. They are not operating in the headwaters of the Salmon River, or the Snake and Columbia river systems. The FAP would be unique, not comparable to Nevada operations in these regards.

The Stibnite dam design has many imbedded strengths such as; the tailings design team has been intact since the prefeasibility study 2013-2014, there has been 100 foundation boring tests for the TSF, utilizing 3 different drilling methods and lab work. The Stibnite dam is a downstream construction method that is great for higher seismic areas, wet application and where control of pool is needed. Angular rock is used creating good interlock verses round rock. Each level of dam raise is built upon previously constructed levels creating a dense foundation, the dam is constructed in 2-3 year increments allowing for pool raise and adequate freeboard, it's not a one-time build as would be for storing water. Half life of the liner is hundreds of years, and even better as it is not subjected to UV damage once buried. The designed pooled water level behind the dam is tens of feet, not hundreds of feet.

Still though, tailings dam failures are not just something out of mining's yesteryear. As I understand and I may be wrong, the FAP does nothing to adequately cover cost of accident or environmental damage. There appears insufficient data in the FAP as exists to ensure the environment is appropriately conserved, or mended. It appears to me the FAP needs to provide coverage in addition to mine related closure- For environmental damage sourcing onsite, and extending offsite. Going forward to final EIS, I see need for an elevated level of scope and cost data for public consideration.

The FAP is a cornerstone to the entire Midas Gold proposal, and highly touted. It's concerning that the Forest Service [midot] released this Draft Environmental Impact Study in what appears incomplete form regarding the FAP, it's absence of pertinent data. It's alarming that as currently disclosed, firm FAP data won't be determined until after federal decision/project approval, with no exposure to public review or oversight. Things do, and have gone terribly wrong, even in this modern age. It seems prudent that the FAP should be critical path. Inadequacies or voids in the FAP drive a huge concern- How is actual cost covered IF environmental reclamation, enhancement, restoration, accident and/or environmental damage exceed what was calculated to be sufficient, AND surpass contingency amounts?

Many younger workers have left Idaho, and more continuing to do so, displaced from home and families to other states for far better pay and benefits. The shale oil industry to the east and the mining industry to the south draw many talented workers, even those just entering the workforce out of Idaho. The Stibnite Gold Project can help reverse this alarming trend. An \$80,000 annual worker income, or payroll over \$40 million would boost economy across several communities. An estimated \$506 million federal and \$218 million state and local taxes would certainly help budget shortfalls. The closures of Boise Cascade Corp sawmills in Cascade, Emmett, Horseshoe

Bend and Council, the ensuing dearth of the timber industry, the financial issues and collapse of Tamarack Resort heavily impacted solid source revenue. These things have also contributed heavily to family sustaining job loss, and exit of vibrant youth over wide area. Valley County, Adams County, Boise County, and Gem County can certainly use a boost. With the continuing massive influx of people into the Gem State, the impacts on infrastructure, and the roundhouse damage inflicted by Covid, Idaho can use a boost. As a good neighbor and strong partner, Midas Gold can be that boost.

Midas Gold understands the wholesome value of bringing people to the table, being present at the table- Like many of us were raised. Their webinars have been informative with interactive feature. They are transparent and engaged in community. They display many earmarks of being purpose driven. They have become engrained in Idaho communities. Their proposed clean-up is solution minded. Midas Gold has a vested interest in Idaho. There are many reasons Midas Gold does deserve a chance. Not by chance, but through their committed course of investment and due diligence.

Stibnite is said to have one of the nation's largest gold reserves, capable of producing over 300,000 ounces annually. As an exploration stage company, Midas Gold has done well in the advancement of their exploratory project. They are at a point where some solid exploratory companies, or junior miners are bought out, actually further along. As reference: Newmont's \$2.3 billion purchase of the Long Canyon Project from explorer Fronteer Gold in 2011, gold then was approximately \$1,300 an ounce. The Globe And Mail covered that sale in an article by Brenda Bouw February 3, 2011, headlined Newmont to acquire Fronteer Gold in a \$2.3 billion deal.

The article offered in part, "Newmont noted it saw more value in buying development assets in today's market rather than mines already in production." The article offered comment by Newmont CEO Richard O'Brien- A QUOTE "We are willing to go almost anywhere in the world, but we always like to go where we can realize a higher return." END OF QUOTE.

The project is attractable, likely even marketable. It's no surprise it has attracted strategic investment by proven worldwide miner, Toronto, ON, Canada based Barrick Gold Corporation, twice. Barrick operates 16 sites or projects in 13 countries. It's interesting to read that Warren Buffet whom has historically denounced gold as an investment, has recently taken an approximate \$500 million dollar stake in Barrick. There has been substantial investment in The Stibnite Gold Project two different times by New York investment management firm Paulson & Company, on behalf of several investment funds and accounts managed by the firm. Between Barrick, and Paulson & Company they have a holding of over 60% of Midas Gold's outstanding shares. While not strictly an environmental concern, it would be zero surprise to see a Midas Gold sale, merger, or even a takeover.

Eric Sprott is one of the largest gold equity holders in North America. Sprott Capital Partners (Sprott) has been mentioned within the Paulson & Company investment. Their platform includes amongst many other values- 1) Advisory for mergers, acquisitions, sales, and divestitures. 2) Expertise in cross-border execution. This summer 2020 Eric Sprott's wholly owned Sprott Mining, based in Toronto, ON, Canada purchased the remaining 20% equity interest with 80% previously owned in Jerritt Canyon Gold LLC (JCG), as per the JCG web page news. Privately held JCG is growing mid-tier gold producer located about 50 miles north of Elko, NV in the Independence Trend ..

Ownership change of The Stibnite Gold Project, or even heavy share control could alter perimeters of board members, senior management, operations, and community relations. For a reference-The apparent boardroom coup, firing, rehiring and in-fighting at the highest levels of Boise based Micron Technology in the developing years. This after Jack Simplot's considerable stock purchases, which were reportedly nearly 20% of the company's shares. Enough stock control can leverage a lot.

I Have Concern that land and/or water disturbance may release concentrations of toxins and heavy sediment

that have been somewhat contained for numerous decades, some naturally occurring toxins for thousands of years. ScienceDaily ran an informative article June 24, 2016 headlined For nature, gravel-bed rivers most important feature in mountainous Western North America. The article was sourced through the University of Montana.

Associated drainages downstream could be heavily degraded should something go awry. Giving downstream some clarity-The Salmon River including headwaters of the South Fork of the Salmon, The Snake River, and The Columbia River including its estuary Associated lands and waters, fish and wildlife, human populations, agricultural operations, commercial operations. Adequate alignment of The Financial Assurance Plan appears to have very extensive needs.

I Have Concern of adverse impact to property owners and the environment along Johnson Creek, through the Yellow Pine area, along the East Fork of the South Fork, into Stibnite. Early end clean up and construction traffic for two years will likely be very heavy, loud, dusty, fast, slow, obstructive, intrusive, likely an increased hazard. I have little doubt there will be mishaps, spills, and maybe worse. Equipment failures lead to many fires once roadside vegetation, brush and timber become dry. Sediment is a concern given the close proximity of the road to Johnson Creek. Nearby homes, even if seasonal will be impacted by mine traffic or effects of. Midas Gold has worked with the Forest Service and Valley County in portions of road improvements. Best Management Practices could also include major routes of mine related travel that are offsite. Possibly intense consideration could be given to expediting the Burntlog route (Alternative 2) and connection to mine site. Burntlog should relieve many concerns and enhance safety once completed.

I Have Concern of the limited access, and calendar period road closure controls in the Stibnite vicinity, a forced restriction upon the public that could expand in the future with mining operations. Sugar Creek access has been closed, seemingly a travel management plan by the US Forest Service. There are many legacy areas nearby with extraordinary historical significance- Cinnabar, Thunder Mountain, and Big Creek included. Cinnabar is thought to be one of the most intact historical mines in the country. The Sugar Creek closure has impacted access, Midas Gold has been entangled for providing resources that assisted in the Sugar Creek closure.

Midas holds the reins of control regarding when the Stibnite road is closed, or open for safety reasons. These are points of aggravated contention, especially locally. A looped route in, around and out of these areas to extent possible, instead of single source in and out, would go a long ways in the eyes of the public. I encourage Midas Gold and The US Forest Service to mesh on unfettered public access, push it forward to best resolution. One never knows where collaboration, maybe even consideration of possible cost sharing with user groups and the recreating public may go.

I Have Concern that landowners and the public are losing safe passage. As does Midas Gold deserve a chance. Landowners and the public are deserving of continued safe passage. Reasoning minds can discern that public safety would be greatly enhanced with travel routes void of massive mine equipment, possible left hand traffic, roadside berms as high as 4' and more, and the periodic greasiness, even vehicle damage of mine road treatments. People with exposure to major mining activities can attest to the exponential risk involved when people not adequately familiar with mining operations are mixed with massive mine equipment. Some of this mobile equipment can be several stories tall, have enormous blind spots in operator vision, axle height 4' and more, and are capable of destroying smaller vehicles. Most times loaded at maximum tonnage, operating at mine speed, in inclement weather, and tough visual conditions.

While allowing passage, the mixing of public with active mine operations during construction and operations is concerning. Rarely is the case that mine site accidents involving even standard size pickups and massive mining equipment are not crushing fatality, worse yet- Multiple. In any season of the year. This even with extensive training, annual refresher, and encompassing safety protocol required by the Mine Safety and Health Administration (MSHA), for mine site personnel. MSHA carries out the provisions of The Federal Mine Safety and

Health Act of 1977 (Mine Act). Vehicle-on-vehicle accidents were a subject of a recent MSHA educational campaign focused on reduction of such concern. Mine fatality reports gives added credence to this very concern. Through the years, a proven safety enhancement are Light Vehicle Only roads through immediate site operations, avoiding Haul Roads. These do well for separating vehicles from mine equipment operations, and are easily reconfigured as mining phases progress.

Unsuspecting people think operators of large equipment can easily see them, people don't realize how quickly these massive machines cover ground, fail to consider stopping distance of big, loaded machinery, and more. I do realize the majority of citizen vehicle/mine mobile equipment mixing would mostly involve the immediate Stibnite area. An expedited Burntlog Route (Alternative 2) appears to reduce concerns of safety and mine traffic impact to, and through the Johnson Creek, Yellow Pine AND Stibnite areas. Burntlog has many values including providing primary and secondary routes, Especially if pushed forward to extent possible for early end cleanup and initial construction. Burntlog does little though to help with public and mine operations mixing in immediate Stibnite vicinity at times, and likely presents environmental problems of its own.

Restricted public access, adverse impact to property owners, loss of safe passage- Real and perceived are weighty issues. These topics can be a source of push back to Midas Gold and the forest service agency. Midas Gold proclaims to invest at least a billion dollars in their Valley County project through construction. Another \$2 billion or so in operating costs. Midas Gold displays good neighbor intent. There should be effective means to minimize mine impact even early end, and sustain, maybe even enhance public access, and promote safe passage.

I was born in Emmett ID. My wife and I are 36 year homeowners in Boise, and 30 year landowners in Valley County. We enjoy the many wonders of Idaho in every season of the year. We also recognize that we exist in a modern world, enhanced by the usage of minerals, precious metals and renewable resources. We appreciate and respect both private, and public lands, and history throughout the Gem State. We travel the HWY 55 corridor and extending routes extensively. We enjoy the peace and serenity of the Idaho landscape, have a wide range of outdoor interests and pursuits. We appreciate and respect the values and opportunities within, commercial activities included.

I was a fortunate youngster to spend the summer of 1971 on Johnson Creek with Lafe and Emma Cox. An educational experience of mountain application I will never forget. They operated Cox's Dude Ranch for nearly 50 years, after buying it in 1947 from Lafe's parents, a 1927 homestead. This endearing and cherished couple worked 20 hour days, for a lifetime it seems. They opened their home to anyone in need, first at The Mile High Ranch, then Cox's Dude Ranch, and also their retirement home on The VO. Idaho pioneers, admirable curators of central Idaho. Lafe and Emma's verbal and written accounts of their life together have immense factual and historical knowledge. For a historical reference of the Stibnite/Yellow Pine area I offer their book Idaho Mountains, Our Home: The Life Story Of Lafe and Emma Cox, by Emma Cox. Lafe himself was gone at 87 in April 2002, truly one of Idaho's Distinguished Citizens. Emma passed away at 91 in July 2011. Her legacy, historian, humanitarian, and supporter of youth.

I have a brother that graduated high school the 1972-73 year in the one room school house in Yellow Pine. Today he lives part time in Yellow Pine, and provides supportive services in area. A long-time family friend operated the Yellow Pine Store, with Post Office prior the Parks family. Then he and his wife owned and operated the Zena Creek Ranch down the South Fork. I have fond memories, revered feelings of the Big Creek, Thunder Mountain, Stibnite, Yellow Pine, East Fork Of The South Fork Of The Salmon, the South Fork, and Warm Lake areas. Likewise the people there, travels to and from, stories of earlier times, and area characters already departed.

My employment spans 40 years, same entity. We support industry locally, regionally and off-shore. Heavy industry and infrastructure depend upon reliable and cost effective suppliers. Although domestic configured, shop

products have shipped by client arrangement to Canada, Russia, Indonesia, Honduras, Mexico, Panama, Australia, American Samoa, The Amazon and Cameroon. There is tremendous commercial exchange within and around the organization, sister operations and suppliers, integral components of Idaho's resilience. The shop, partnering suppliers, and their downstream vendors are imbedded in supply chains of domestic and international markets. Many of these companies are family owned, small business and domestic configured. To maintain the vibrancy of all there must be a continuing stream of viable opportunity from responsible, accountable organizations.

Midas Gold's investment in Idaho can create immense commercial opportunity, solid tax revenue and considerably more laudable values. Large aspects of The Stibnite Gold project could be well supported on at least a regional level. Many aspects could be well supported by capable Idaho organizations. It's a sincere hope that Idaho workers comprise much of the talented and well compensated workforce.

September 10, 2020 Midas Gold Released statement titled- Federal Permitting Dashboard To Improve Coordination For The Stibnite Gold Project. The Dashboard includes in part- (paraphrasing) 1) In 2018 The Department of Interior issued its final list of 35 critical minerals, antimony among them, and in 2019 The Department Of Commerce issued its comprehensive. Federal Strategy To Secure Reliable Supplies Of Critical Minerals. 2) The Permitting Dashboard is a result of infrastructure development, a domestic supply of critical minerals for national security, and the environmental restoration of what has been a long abandoned and contaminated mine site.

I have interacted with Midas Gold personnel on different occasions. I can speak to their response, and support of community. Late 2013 and early 2014 Midas Gold helped with the Smith Family plane search. In addition to company involvement many Midas workers eagerly searched on their own, were some of the earliest in the effort. Midas personnel used a dozer and backhoe from the Stibnite site to assist 13 people, in two different hunting groups, on two different days that got caught in an early winter storm of heavy snow, and 7' drifts. September 2020 the Buck Fire had a northern track down Johnson Creek toward Yellow Pine. Midas Gold delivered additional firefighting equipment to bolster community capability. October 17th and 18th a hunter became lost from his party near Thunder Mountain. Midas Gold assisted many first responders with a successful search and rescue for him. Midas Gold is an asset within community, they are responsive to accident or need in and around Yellow Pine.

The quality of our air, streams and groundwaters, fish and wildlife are critical. Light and noise trespass are concern too. The tranquility of our rural areas, open landscapes, even our dark night skies are important. We must protect these things for descending generations. It's very important to also appropriately weigh the economic and social values within responsible mining, and that of other natural resources too. This world would be a dismal place without their useful contribution to society. Possibly through this very EIS process, this encorypassing need becomes more illuminated.

It's worth mentioning that the 2018 Idaho legislature, both chambers- Passed with overwhelming support a joint memorial asking the President of The United States, Idaho's Congressional Delegation, the Administrator of The Environmental Protection Agency, The Secretary of The Interior, and The Secretary of Agriculture to take the steps necessary to approve Midas Gold's Stibnite Gold Project in a timely and cost-effectively manner. I believe this to be a nod to business and jobs opportunity, and an attempt to streamline a heavily encumbered regulatory process.

The Stibnite Gold Project has been measured at congressional level. One can read that House Appropriations Subcommittee chairperson Betty McCollum of Minnesota, vice-chair of the committee, and four other House Democrats expressed concern about the Presidential Administration's allowance of Midas Gold writing in large part their own biological assessment (BA) on proposed open pit gold mines in Idaho. The environmental group Earthworks called for documents to be presented. There have been Op-Eds raising related concerns of self-

servicing interest within Midas Gold. In contemplating these concerns I came to understand that the BA by Midas Gold was draft configured. This included interactions of Federal and state agencies, and Idaho tribes, with final biological assessment to be prepared by the US Forest Service. A Midas Gold blog on subject offered in part- TWO QUOTES 1) "The draft assessment is not the final document. All authority for creating the final document remains in the hands of federal agencies." 2) "An open, collaborative and inclusive process ensures all relevant information and perspectives are at the table." END OF QUOTES. I have no doubt impropriety rings believable in some circles, seemingly thrown at the feet of Midas Gold, and the Trump administration.

What's easily detected is the keen ability to identify favorable policy shifts- Which there is within the Trump administration, to self-advocate, to coordinate a fluid public relations campaign, and yes, effectively lobby- All forms of competitive strategy. Midas Gold has shown light on major inadequacies with the NEPA permitting process, they have championed betterments, pushed them front and center. There is similar set of circumstances several years prior during the Obama¹ administration, with a different Federal agency as regulatory lead. Supporting Midas Gold's position, is a reference I submit in the following paragraph.

Consider Newmont Mining Corps handling of the permit process for their New Long Canyon Mine project on the eastern flank of the Pequop Mountains, West of Wendover, NV. There is an article in the summer 2013 edition of The Mining Quarterly published by The Elko Daily Free Press, written by Marianne Kobak McKown- Long Canyon works on environmental study. McKown had interviewed Dan Anderson- regional environmental affairs manager for Newmont. The article offers in part (paraphrasing) The baseline studies were done up front, Newmont engaged with BLM and other state and local agencies. A QUOTE "When the plan was submitted they basically took this plan of operations and they thumbed through it and said 'this is everything we expected, this was everything we wanted; this is what we asked of you,' so the review period on that... it went very quickly." END OF QUOTE. Anderson also stated within A QUOTE "Its smoother and its more efficient. Its more efficient for us and it's more efficient for the BLM," he said. "We're not reviewing and re-reviewing comments and playing the regulatory pingpong match." END OF QUOTE. Mining at Long Canyon officially started January 4, 2016.

I offer related matter, feeling it has bearing on topic. I began following the Idaho Cobalt Project (ICP) in 2009, a proposed cobalt mine in the Panther Creek drainage, Lemhi County, west of Salmon, Idaho. ICP was owned by Formation Capital Corporation, a wholly owned subsidiary of Formation Metals Inc, which like Midas Gold Corp, is based in Vancouver BC. The US Forest Service was the lead regulatory agency in that EIS. The Formation group was able to achieve a nonopponent status from the Conservation League, and win the blessing of past Idaho Governor and Secretary Of The Interior, Cecil D. Andrus. Andrus was a fierce opponent of the mining industry throughout majority of his long and distinguished political career. He was a member of The Conservation League, and became a board member of Formation Capital. One can determine these things were effected to help raise funds, win over public sentiment, hopefully achieve favorable ROD and full permitting for the project.

There were numerous mention that the ICP would to the best of commercial outlets and talented workers available, award and hire locally. As was the case with ICP there is strong Midas Gold support within associated industry, and community on a local level. An EPCM contract, or general contractor can have tremendous control over supply chain, bidder pool, and descending awards.

It's informative to read the testimony of Laurel Sayer, President and CEO of Midas Gold Idaho, Inc, to the United States Senate Committee On Energy and Natural Resources, effected July 17, 2018. Her introduction, testimony, recommendations, and conclusion meshes with the history of Stibnite, the values within the project, and the need to streamline cumbersome and costly environmental review under NEPA. Lower end of paragraph three, page four of her testimony includes a comment of hers in part- A QUOTE "equally robust permitting processes in first world countries like Canada and Australia are regularly completed in two to three years and at considerably lower cost. There is no reason that we in the United States cannot have an equally thorough, effective and efficient process that is completed in timely manner." END OF QUOTE. I agree that lengthy permitting processes, over regulation and legal wrangling impact many US industries top down. Many times investors want quicker returns

than what is common in the US, offshore locations are likely to provide that. Streamlining our federal and state permitting processes without cutting corners is a needed focus. It's worth mentioning that Canada is home to many mine focused, large investor organizations. Hence many Canadian configured mining operators in the U.S.

The US Forest Service can conclude forward motion of this particular mining proposal. Another course, the agency could help instill environmental safeguards, minimize local impact, enhance public safety, protect public access, secure safe passage, facilitate growth of the economic pie, while participating in commercial diplomacy. That's a long sentence, and would be a huge undertaking. These things too can be solution based. Any one of them, and as a whole appear worthy.

None of this will have come easy, even in singular. It's appropriate to bear in Midas Gold has invested heavily, already performed extensive clean-up, area enhancement, and completed most of the procedural heavy lifting. As lead agency in this EIS process, it appears that the US Forest Service, a federal agency under The US Department of Agriculture, could foster a holistic consideration. This endeavor can align with the USDA Forest Service motto "Caring For The Land And Serving People."

Most long term Idahoans are aligned with a utilitarian mindset, an embedded land ethic. Visitors and commercial operators are expected to adhere to the same. With that in mind, Alternatives 1-4 all have environmental improvement actions. Alternative 1 was a fair baseline point of planning. Alternative 3 pales compared to Alternative 2 as it does not improve on the aspect of tailings. Alternative 4 advances primary mine travel impact from upper Johnson Creek and most of the East Fork of the South Fork routes to Stibnite. Alternative 4 also has single route entry to, and exit from mine site, this can be bettered. Alternative 5 kicks the can (proposal) down the road to another point in time, be that Midas Gold or some other group that may or may not be as well vetted. If regulators are going to advance the proposal, Alternative 2 appears most promising, appears best approach from our porch in Boise.

As a citizen of the Gem State I submit concerns within the Stibnite Gold Project. I look for continued betterment going forward. As an informed employee of a long standing commercial entity, I submit that the project can be a viable, responsible, accountable, opportunity. I substantiate both positions by being an Idaho stakeholder, and experiencing a tenured career in related industry respectively.

It is my hope that the many comments within are helpful in the overall evaluation of Environmental Impact Study #50516. I urge that the values, and concerns are wholly considered. That they are supportive of a thoroughly final Environmental Impact Study, a very complete Record Of Decision.

It's my perspective that Midas Gold is well positioned, the Stibnite Gold Project can and should move forward on merit. That would include being good stewards of our lands and waters. If it does- I'll hope for, appreciate, and support successful operations through the phases.