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First name: Cynda

Last name: Herrick

Organization: Valley County Planning & Zoning Commission

Title: Valley County Planning and Zoning Administrator

Comments: It is my understanding that October 28, 2020, is the last day to make comments concerning the Stibnite Gold Project DEIS. The following are my comments as the Valley County Planning and Zoning Administrator.

In conjunction to the EIS protocols, once/if the Stibnite Gold Project is approved, Midas Gold will need to seek additional Conditional Use Permits from Valley County for their proposed land uses that are appurtenant to a large mining project. Our considerations as described below are also part of our standard protocol for any approval process.

Social and economic factors of the project are an impact that will need to be mitigated in a Valley County agreement and is already a condition of approval for an existing conditional use permit. Those concerns include impacts to area businesses in competing for a limited workforce, strain on school systems, increased call volume for EMS and law enforcement agencies, and exacerbation of existing housing shortfalls in terms of workforce/affordable housing and mid-level real estate/single family homes. In addition, the county must consider the burden an influx of employees will have on sewer and water within existing municipalities and districts, telecommunications throughout the valley, and the impact on county roads.

Another consideration is the impact on recreation areas and access. Proposed routes which restrict popular snowmobile routes and back country ski locations are scrutinized for compatibility in compliance with the Valley County codes. Methods for maintaining what currently exists, controlling, and allowing access to winter areas beyond what is currently in place would need to be analyzed. There will need to be a collaboration for shared access routes or rerouting of various recreational trails.

Impacts on county roads will be mitigated in a Road Development Agreement. Matters considered in the agreement will be road traffic on avalanche hazard areas being a public safety. There will need to be a carefully considered examination of all road hazards presented. Winter traffic patterns will need to be studied. It is anticipated that the agreement will require annual maintenance in a collaborative effort.

Valley County considers the impact to water quality a primary factor. Within any agreement are requirements for engineered BMP's to be used to control the potential for impacts to water quality along our rivers and streams. Our state highways have seen significant effects of magnesium chloride to include degradation of the roadway and to roadside vegetation; this would need to be considered as a potential impact to local roads. The effect of any project to local streams and watersheds is a great concern.

Other considerations will be the impact to hunting and fishing; and, the long-term impacts to the potential overuse of tourist assets. Our communities rely on summer and winter recreation for their economic well-being.

Finally, we recognize and appreciate the efforts that have gone into the Draft Environmental Impact Study from all agencies involved. We ask that consideration be given to the protocols for future approval of Valley County projects.