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September 8, 2020

Valley County Board of Commissioners

219 N. Main St.

Cascade, ID 83611

Sent by email to: commissioners@co.valley.id.us, cherrick@co.valley.id.us

RE: Conditional Use Permit for the Stibnite Gold Logistics Facility

Dear Commissioners Hasbrouck, Maupin and Bingaman,

The Idaho Conservation League represents members in Valley County who are concerned about Conditional Use Permit 20-12 for the Stibnite Gold Logistics Facility. We recommend that you defer approving the application as submitted due to incomplete information from the applicant. We are particularly concerned about potential inconsistencies with Valley County's Comprehensive Plan. In considering this decision, the commissioners must also be aware of the requirement to avoid conflicts of interest.

We have reviewed the proposal and believe that this scale of industrial development is incompatible with maintaining open space and the rural and pastoral qualities of that area. In addition, the application fails to address how the facility will be utilized following the closure of the mine. Furthermore, this permitting will likely lead to additional development along this corridor that is also inconsistent with the Valley County Comprehensive Plan. The application fails to discuss or disclose the impacts of mine-related traffic (light vehicle, trucks, buses, etc.) on current transportation plans. We note that this facility will also likely have increased noise and light dramatically out of character from the surrounding area. The DEIS lays out multiple plans that describe alternative routes of material transport along and different traffic estimates associated with the operation of the mine. The logistics facility should be tailored to reflect the type of vehicles, volume of traffic, and the contents carried. We note that the specific details will

vary depending on which specific alternative that is selected. Furthermore, these details will change from month to month and year to year depending on the project sequencing that is selected. Before approving the CUP, Valley County should have a commitment from the Forest Service on which alternative or combination of alternatives will be selected, as this will determine the actual needs of the logistics facility. Valley County can make use of this additional time to establish local baseline traffic conditions, take a closer look at transportation risks, consider the actual effects of the project and propose CUP design features that could help avoid, minimize or mitigate these impacts. ,

Regarding site specific issues for the logistics facility, the large amount of impermeable surface and concentrations of oils and other materials from vehicles, as well as hazardous chemicals such as sodium cyanide, ammonium nitrate, diesel fuel, and dust from mining activities, could lead to high levels of mobilized contaminants on these surfaces following rainfall and snowmelt. We are particularly concerned about the proper management of contaminated stormwater during rain on snow events. Stormwater may also need to be treated as hazardous waste and may not be suitable for disposal in adjacent wetlands. We note that snow removal from this facility will also likely need to treat the snow itself as hazardous material and not sidecast it in an unmanaged area. While the applicant states they will truck grey water produced to an off-site facility, additional information is needed about where and how this hazardous material will be disposed of because transportation of this material may also pose safety and environmental risks.

We also note that mining-related facilities for even fully permitted projects have ended up not being utilized and in need of interim stabilization or even reclamation due to delays in mine financing. As we mentioned in our comments to the Planning and Zoning Commissioners, the Idaho Cobalt Project on the Salmon-Challis National Forest was a fully permitted project but delays in financing resulted in on and off-site infrastructure (pond liners, buildings, office spaces) not being utilized as intended and not being utilized or needing reclamation. We recommend that the county require a more comprehensive bonding and contingency plan in the event that this space is not utilized as intended.

Construction and use of this facility would likely not take place for a number of years as Midas Gold navigates the NEPA process. This gap in timing brings forth a number of potential conflicts with the Board's Comprehensive Plan and raises questions about the appropriateness of the Board's approval of the project at this time given the unknowns still associated with this proposal. The current composition of the Planning and Zoning Commission and voting board

may not be the composition at the time that this project is finalized, constructed and operational. Approval of the project now deprives the future board members of their authority to make a decision on the project at a time where crucial facts will be known. The fact that final project permitting is likely still several years out will also violate Valley County Code § 9-5H-8(B)(1) which requires “approval [of a CUP] shall be for a period of one year from the date of the hearing, after which time, the approval will expire and be null and void unless the applicant has substantially complied with the provisions thereof or has applied for an extension of time. . .”.

We realize that many citizens of Valley County have strong opinions about various aspects of the Stibnite Gold Project, including the Conditional Use Permit. We appreciate the difficult decisions that Valley County staff and Commissioners are asked to make based on information that may be sometimes incomplete. For the reasons cited above, we believe the uncertainties regarding which alternative will be selected for the Stibnite Gold Project and actual needs for the logistics facility should lead the Commissioners to defer on approving the logistics facility at this time.

Sincerely,

A handwritten signature in black ink that reads "John Robison". The signature is written in a cursive style with a large, sweeping initial "J".

John Robison
Public Lands Director
jrobison@idahoconservation.org