



Cynda Herrick, AICP, CRM
VALLEY COUNTY
IDAHO

PO Box 1350
219 North Main Street
Cascade, Idaho 83611-1350

Planning & Zoning Administrator
Floodplain Coordinator

Phone: 208.382.7115
FAX: 208.382.7119
Email: cherrick@co.valley.id.us
Web: www.co.valley.id.us

STAFF REPORT

Conditional Use Permit Application 20-12 Stibnite Gold Project Logistics Facility

HEARING DATE: July 16, 2020
TO: Planning and Zoning Commission
STAFF: Cynda Herrick, AICP, CFM
APPLICANT/OWNER: Midas Gold Idaho INC
P.O. Box 429
Donnelly, ID 83615
LOCATION: TBD Warm Lake Road; Parcel RP14N05E074475 located in the
W ½ Sec 7, T.14N, R.5E, Boise Meridian, Valley County, Idaho
SIZE: 25 acres
REQUEST: Logistics Facility
EXISTING LAND USE: Bare Ground

BACKGROUND:

Midas Gold Idaho INC is requesting a conditional use permit for a facility to support mining operations. The facility is proposed to reduce traffic to and from the remote Stibnite Gold Project site. Personnel would park at this site and be required to travel via bus or vans to the mine site.

Four buildings are proposed, totaling approximately 64,380 sqft of available floor space:

- an administrative office/assay laboratory
- warehouse
- hazardous materials storage
- a core sampling and storage building

Maximum building height will be 30 feet. All facilities will have fire extinguishers and smoke detectors and will meet fire and building code requirements for health and safety. The buildings will be colored to reduce contrast between the facilities and surrounding area.

The proposal includes parking facilities, a truck staging area, and a laydown area; 300 parking

spaces are planned. Thirty percent (30%) of the site will be landscaped (natural vegetation and reseeded areas); 6% will be for building coverage; 42% for parking/driveway; and 22% for lay-down area.

The hazardous materials storage building will be used to store hazardous materials that are generated at the Logistics Facility prior to being shipped for disposal as per the Resource Conservation and Recovery Act requirements.

Electricity from the Idaho Power Company powerline in Cascade, individual well, and a septic system are proposed. The exterior lighting would comply with Valley County Lighting Ordinance and their plan is included in the application.

The timing of construction is dependent on completing the permitting for the Stibnite Gold Project and would occur over a three-year period from 2021 through 2023. Mining operations at Stibnite are expected to start in 2023 and continue to approximately 2037. Reclamation and closure activities will take an additional 3+ years. The Logistics facility will operate through the end of reclamation and closure and then be kept for other company purposes.

The Logistics Facility would operate Monday through Friday, 8 a.m. to 5 p.m. with occasional weekend use.

Portions of the site not identified for grading or facility construction will be left in their current condition. Areas disturbed during construction but not compacted for parking or facility footprint will be seeded with native plant species. The two wetland areas would be protected.

The 25-acre site is adjacent and east of Warm Lake Road, approximately 8.5 miles east of Highway 55.

A traffic-impact study is included in the application. Three ingress/egress entries are proposed; one of which would only be used during construction activities.

FINDINGS:

1. Application was made to Planning and Zoning by May 26, 2020.
2. Legal notice was posted in the *Star News* on June 18, and 25, 2020. Potentially affected agencies were notified on June 9, 2020. Neighbors within 300 feet of the property line were notified by fact sheet sent June 9, 2020. The site was posted on June 25, 2020. The application was posted on the Valley County Public Hearing website.
3. Agency comment received:

Central District Health replied in a Review Sheet stating they have issued a septic permit for this facility. Applicant will need to verify with DEQ if a public water system will be required. (June 15, 2020).

Steven Hull, Cascade Rural Fire District Fire Chief, reviewed the plans. The site is outside of the Fire District's boundary. All apparatus Access Roads shall be built to the International Fire Code Standards 2015. See Section 503.2.1 and 503.2.3. Flow from the well shall be sufficient for the type of building and construction as required by the International Fire Code Appendix B. (July 9, 2020)

4. Public Comment received (attached):

Proponents

- A central location for staging people.
 - Will reduce traffic and increase safety on Warm Lake Road.
 - Fewer vehicles will result in reduced emissions, sediment, and dust.
 - Will add jobs to the local economy.
1. Dan & Chris Davis, 508 N. Idaho ST, July 8, 2020
 2. Bette Bruett, 183 Lake Shore Place, Warm Lake, July 9, 2020
 3. David and Kacie Bracht, 26 Goslin Loop, July 9, 2020
 4. Charles Jamerson, July 9, 2020

Opponents

- Negative impact to scenic area used for recreational and backcountry access.
- Would set damaging precedent for future industrial development in the area and create an industrial corridor.
- Conflicts with Comprehensive Plan statement to retain the rural character enjoyed by residents and visitors.
- What will happen to the site after the mining operation is done?
- Facility should not be approved prior to release of the draft environmental impact statement for the Midas Gold Project at Stibnite.
- Impact Report fails to consider new traffic generated by facility.
- Impact Report erroneously concludes facility will not impact housing affordability.
- Impact Report fails to provide an adequate assessment of noise impacts and how such impacts are to be minimized.
- Inconsistent with Valley County Code maximum lot coverage and fails to reasonably describe the heat, glare, and light impacts.
- Fails to address particulate emissions in meaningful way.
- Not enough information on water disposal method.
- The application does not include impacts on wetlands, surface/groundwater, Big Creek, wildlife habitat, and other natural resource use.
- The potential for fire, explosion, and other hazards from producing, storing, and transporting hazardous chemicals is not disclosed.
- Mitigation of visual impacts are inadequate
- Revenue and economic impact analysis is inadequate

1. Save the South Fork Salmon, McCall, July 8, 2020
2. Amy Rush, 127 Kens Place, July 6, 2020
3. Dr. Nora Flucke, July 6, 2020
4. Jared Alexander, McCall, July 7, 2020
5. MaryLou Rush, 176 Maki Lane, July 7, 2020
6. Marilyn Olson, Timber Ridge Court, July 7, 2020
7. John Lewinski, McCall, July 7, 2020
8. Judy Anderson, Lake Fork, July 8, 2020
9. Mary Petterson, McCall, July 8, 2020
10. Kristin Bierle, Cascade, July 8, 2020
11. John Rygh, July 8, 2020
12. Craig Rabe, July 8, 2020
13. Charles Ray, McCall, July 8, 2020
14. Tor Andersen, July 8, 2020
15. John Bengtson, July 8, 2020
16. Julia Welch, New England, July 8, 2020
17. Zak Sears, McCall, July 9, 2020
18. Will Stubblefield, July 9, 2020
19. Ruth Lewinski, July 9, 2020
20. Scott Amos, July 9, 2020
21. Linda Jarsky, Boise, July 9, 2020
22. Justin Kleberg, Cascade, July 9, 2020
23. Michelle Blank, McCall, July 9, 2020
24. Kevin Studley, July 9, 2020
25. Rachel Ackerman, Cascade, July 9, 2020

5. Physical characteristics of the site: relatively flat land with tree cover, primarily lodgepole.
6. The surrounding land use includes:
 - North: Agriculture (Timber and Grazing)
 - South: Agriculture (Timber and Grazing)
 - East: Agriculture (Timber and Grazing)
 - West: Agriculture (Timber and Grazing) and Warm Lake Road
7. Valley County Code (Title 9) in Table 9-3-1. This proposal is categorized under:
 - 6. Industrial Uses (a) Light Industry

The Commission should review the standards in Title 9, Chapter 5.

9-5F-2: INDUSTRIAL USES; SITE OR DEVELOPMENT STANDARDS:

Industrial uses requiring a conditional use permit shall meet the following site or development standards:

- A. Minimum Lot Area:
1. The minimum lot area shall be adequate to accommodate the use, associated activities or use, and to adequately contain adverse impacts.
 2. The minimum frontage along a public or private road shall not be less than seventy five feet (75').
- B. Minimum Setbacks:
1. Light Industrial Uses: The minimum building setbacks for light industrial uses shall be fifty feet (50') from front, rear, and side street property lines and thirty feet (30') from side property lines.
- C. Maximum Building Height And Floor Area:
1. Building heights shall not exceed forty five feet (45') for light industrial uses, and shall be unlimited herein for extractive industrial uses. Building heights for heavy industrial uses shall not exceed forty five feet (45').
 2. The building size or floor area shall not exceed the limitations of subsections 9-5-3A and C of this chapter.
 3. No building or combination of buildings may cover more than forty percent (40%) of a lot for light industrial uses and thirty percent (30%) of a lot for heavy industrial uses.
- D. Site Improvements:
3. Parking spaces shall be provided at the rate of one plus one per two hundred fifty (250) square feet of floor area where applicable for light industrial uses; and one plus one per four hundred (400) square feet of floor area for heavy industrial uses. In any event the parking area shall be adequate to provide parking for employees and visitors.

SUMMARY:

Compatibility Rating: Staff's compatibility rating is a +17.

Staff Questions and Comments:

- Will there be 24 hour per day security guards at the facility?
- What is involved in the disposal of hazardous waste with the Resource Conservation and Recovery Act requirements? Is it federal? Who enforces and/or monitors?
- What chemicals will be located on-site?
- Can you increase setback along Warm Lake RD in order to retain the fringe trees so that the 8' chain link fence with wire on top is not as visible to people passing by on Warm Lake RD?
- Will there be slats in the chain link fence?

- What will happen to the buildings after reclamation of the mine?
- What will be your participation in the recommended intersection improvements listed in Table 25 on page 45 of the application?
- Can parking lot lighting be motion sensors so lights are not on when the parking lot is not in use?
- What is the substation shown on the plans? Who will own the substation shown on the plans? The site plan shows an undisturbed area, but the grading plan shows a substation. Please describe the association with Idaho Power.
- Please address the water quality and wetland issues brought up in various correspondence.
- Do you anticipate starting construction of this facility prior to approval of the activities at Stibnite?
- Some of the correspondence identified various areas of the Comprehensive Plan that address the rural character and small-town feel being retained. The Comprehensive Plan also addresses this specific issue in Chapter 9 Economic Development.

ATTACHMENTS:

- Conditions of Approval
- Compatibility Evaluation and Matrix
- Vicinity Maps
- Aerial View
- Assessor Plat
- Site Plan
- Record of Survey 13-47
- Picture of Notice Sign at Current Entrance, Posted on June 25, 2020
- Responses

Conditions of Approval:

1. The application, the staff report, and the provisions of the Land Use and Development Ordinance are all made a part of this permit as if written in full herein.
2. Any change in the nature or scope of land use activities shall require an additional Conditional Use Permit
3. The use shall be established according to the phasing plan or this permit shall be null and

void. The use shall not be started until approval of mining activities is approved.

4. The issuance of this permit and these conditions will not relieve the applicant from complying with applicable County, State, or Federal laws or regulations or be construed as permission to operate in violation of any statute or regulations. Violation of these laws, regulations or rules may be grounds for revocation of the Conditional Use Permit or grounds for suspension of the Conditional Use Permit.
5. All lights shall be fully shielded so that there is no upward or horizontal projection of lights. The lights can only be a maximum of 20' in height and 3000° Kelvin.
6. The applicant shall provide and maintain orderly and proper disposal of waste including by-products of the operation, other solid waste, hazardous waste, and sanitary waste.
7. Must comply with Central District Health requirements.
8. The minimum building setbacks for light industrial uses shall be fifty feet (50') from front, rear, and side street property lines and thirty feet (30') from side property lines.
9. Parking lots must comply with setback standards.
10. New structures, including fencing greater than 6-feet tall, must have building permits and be approved as part of a conditional use permit.
11. The site must be kept neat and orderly.
12. Shall obtain a sign permit prior to installation of a sign.
13. Perimeter landscaping shall be installed prior to July 1, 2021. If landscaping dies, it must be replaced. Landscaping must be irrigated and maintained.
14. Hours of operation are limited to 7:00 a.m. to 7:00 p.m., Monday through Saturday.
15. A stormwater management plan shall be approved by the Valley County Engineer prior to excavation.
16. Will need an approach permit from the Valley County Road Department.
17. Shall enter into an agreement with the Board of County Commissioners to mitigate impacts to the road system and Idaho Transportation Department.
18. After reclamation and the facility is no longer needed, a new conditional use permit will be required prior to use. If there is no further use of the site, the structures will be removed and the site reclaimed.

END OF STAFF REPORT

APPENDIX A

MATRIX FOR RATING

QUESTIONS 1, 2, and 3

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23		
RESIDENTIAL USES	1. AGRICULTURAL		+2	-1	-2	-2	-2		+1	+1	+1	+2	+1		+1	-1		-1	-2	-1	+1	+2	+1		
	2. RESIDENCE, S.F.	+2		+2	+1	+1	+1	+1	+1	-1	+2	+1	-2		+1	-1	+1	+1	-1	+1	+1	-2	-2	2	
	3. SUBDIVISION, S.F.	-1	+2		+1	+1	+1	+1	+1	+1	-1	+2	+1	-2	+1	-1	+1	+2	+1	-1	+2	+1	-2	-2	3
	4. M.H. or R.V. PARK	-2	+1	+1		+1	+1	+1	+1	+1	-1	+2	+1	-2	+1	-1	+1	+1	+1	-1	+1	+1	-2	-2	4
	5. RESIDENCE, M.F.	-2	+1	+1	+1		+2	+2	+1	+1	-1	+2	+1	-2	+1	-1	+1	+1	+1	-1	+1	+1	-2	-2	5
	6. SUBDIVISION, M.F.	-2	+1	+1	+1	+2		+2	+1	+1	-1	+2	+1	-2	+1	-1	+1	+1	+1	-1	+1	+1	-2	-2	6
	7. P.U.D., RES.	-2	+1	+1	+1	+2	+2		+1	+1	-1	+2	+1	-2	+1	-1	+1	+1	+1	-1	+1	+1	-2	-2	7
CIVIC or COMMUNITY SERVICE USES	8. REL., EDUC & REHAB	+1	+2	+1	+1	+1	+1		+1	+1	-1	+2	-2		-1	-1	+2	+2	+1	+1	+1	-2	-1	8	
	9. FRAT or GOVT	+1	+1	+1	+1	+1	+1		+1		+1	+2	-2		-1	-1	+1	+1	+1	+1	+1	-2	-2	9	
	10. PUBLIC UTIL. (1A-3.1)	+1	-1	-1	-1	-1	-1		+1	+1		+1	+1	-1	+1	+1	+1	-1	+1	+1	+1	+2	+2	10	
	11. PUBLIC REC	+1	+2	+2	+2	+2	+2		-1	-1	+1	+2	-1		+1	+1	+1	+2	+1	+1	+1	+1	-1	+1	11
	12. CEMETERY	+2	+1	+1	+1	+1	+1		+2	+2	+2	+2	+1		+1	+1	+1	+1	+1	+1	+1	+2	+1	+1	12
	13. LANDFILL or SWR. PLANT	+1	-2	-2	-2	-2	-2		-2	-2	-1	-1	+1		-1	-1	-2	-2	-2	-2	-1	+2	+2	+2	13
COMMERCIAL USES	14. PRIV. REC. (PER)	+1	+1	+1	+1	+1	+1		-1	-1	+1	+1	-1		+1	+1	+1	+2	+1	+2	+2	-1	+1	14	
	15. PRIV. REC. (CON)	-1	-1	-1	-1	-1	-1		-1	-1	+1	+1	-1		+1	-2	-2	-1	-2	-2	+2	+2	-1	+1	15
	16. NEIGHBORHOOD BUS.	-1	+1	+1	+1	+1	+1		+2	+1	+1	+1	-2		+1	-2	+1	+2	+2	+1	+2	+1	-1	-1	16
	17. RESIDENCE BUS.	+2	+2	+2	+1	+1	+1		+2	+1	-1	+2	+1	-2	+1	-2	+1		+1	-1	+1	+1	-2	-2	17
	18. SERV. BUS.	-1	+1	+1	+1	+1	+1		+1	+1	+1	+1	+2	+2	+2	+2	+2	+1		+2	+2		+1	+1	21
INDUST. USES	19. AREA BUS.	-2	-1	-1	-1	-1	-1		+1	+1	+1	+1	-2		+1	-2	+2	-1	+2	+1	+2	-2	-2	19	
	20. REC. BUS.	-2	+2	+2	+1	+1	+1		-1	-1	+1	+1	-1		+2	-2	+1	+2	+1		+2	-2	+1	20	
	21. LIGHT IND.	+1	+1	+1	+1	+1	+1		+1	+1	+1	+2	+2		+2	+2	+2	+1	+2	+2		+1	+1	21	
	22. HEAVY IND.	+2	-2	-2	-2	-2	-2		-2	-2	+2	-1	+2		-1	-1	-1	-2	-1	-2	-2		+1	+2	22
23. EXTR. IND.	+2	-2	-2	-2	-2	-2		-1	-2	+2	+1	+2		+1	+1	-1	-2	-1	-2	+1	+1	+2	+2	23	

RATE THE SOLID SQUARES AS +2

Compatibility Questions and Evaluation

Matrix Line # / Use: 21

Prepared by: CH

Stibnite Logistics Facility

YES/NO X Response Value

Use Matrix Values:

(+2/-2) +1 X 4 +4

1. Is the proposed use compatible with the dominant adjacent land use?

Agricultural

(+2/-2) +1 X 2 +2

2. Is the proposed use compatible with the other adjacent land uses (total and average)?

No Others - Agricultural

(+2/-2) +1 X 1 +1

3. Is the proposed use generally compatible with the overall land use in the local vicinity?

All Ag, Forest, a few Single Family 2-3 miles away.

Site Specific Evaluation (Impacts and Proposed Mitigation)

(+2/-2) +2 X 3 +6

4. Is the property large enough, does the existence of wooded area, or does the lay of the land help to minimize any potential impacts the proposed use may have on adjacent uses?

The site is large enough and has a large number of trees along Warm Lake. Surrounding uses will not be impacted - cows grazing.

(+2/-2) -2 X 1 -2

5. Is the size or scale of proposed lots and/or structures similar to adjacent ones?

No - there are no structures.

(+2/-2) +1 X 2 +2

6. Is the traffic volume and character to be generated by the proposed use similar to the uses on properties that will be affected by proximity to parking lots, on-site roads, or access roads?

Cattle trucks, logging trucks, passenger vehicles... Similar use with increased volume

(+2/-2) +1 X 2 +2

7. Is the potential impact on adjacent properties due to the consuming or emission of any resource or substance compatible with that of existing uses?

Yes - may be same noise after construction Lighting...

(+2/-2) -1 X 2 -2

8. Is the proposed use compatible with the abilities of public agencies to provide service or of public facilities to accommodate the proposed use demands on utilities, fire and police protection, schools, roads, traffic control, parks, and open areas?

Will connect to Wab. Power, not in fire district, could be some slideoffs etc.

(+2/-2) +2 X 2 +4

9. Is the proposed use cost effective when comparing the cost for providing public services and improving public facilities to the increases in public revenue from the improved property?

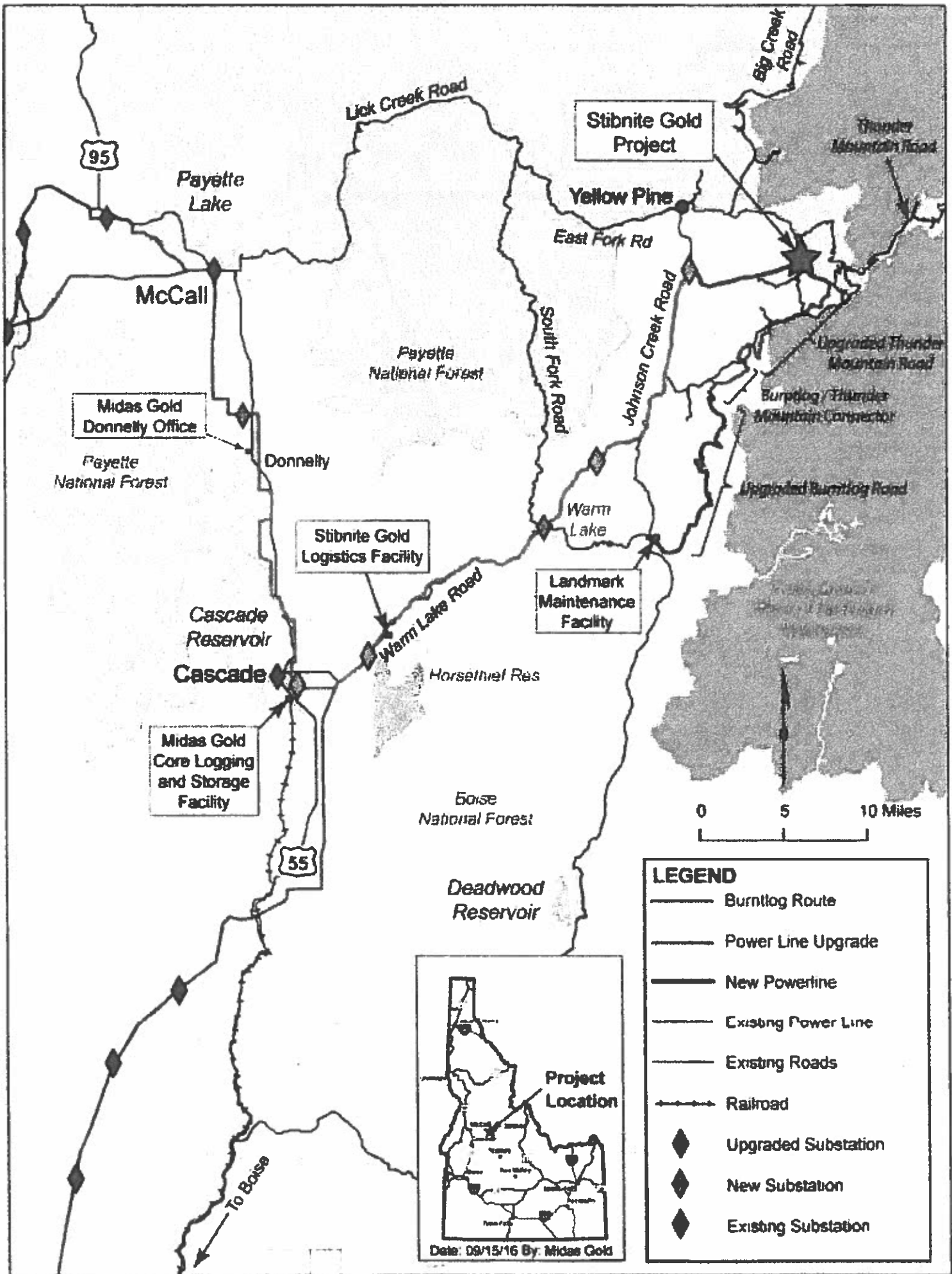
Will increase taxes and boost economy Will provide jobs.

Sub-Total (+) 21

Sub-Total (-) 4

Total Score +17

The resulting values for each questions shall be totaled so that each land use and development proposal receives a single final score.



95

Payette Lake

McCall

Midas Gold Donnelly Office

Payette National Forest

Donnelly

Cascade Reservoir

Cascade

Midas Gold Core Logging and Storage Facility

Stibnite Gold Logistics Facility

Warm Lake Road

Horseshoe Res

Boise National Forest

Deadwood Reservoir

Lick Creek Road

Stibnite Gold Project

Yellow Pine

East Fork Rd

South Fork Road

Warm Lake

Landmark Maintenance Facility

Big Creek Road

Thunder Mountain Road

Upgraded Thunder Mountain Road

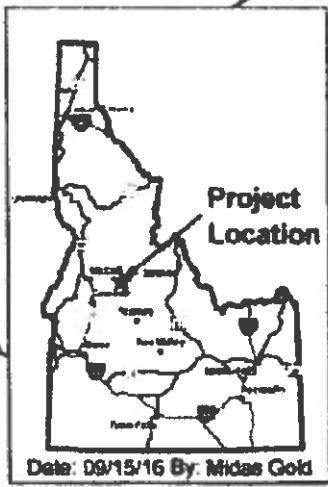
Burntlog/Thunder Mountain Connector

Upgraded Burntlog Road

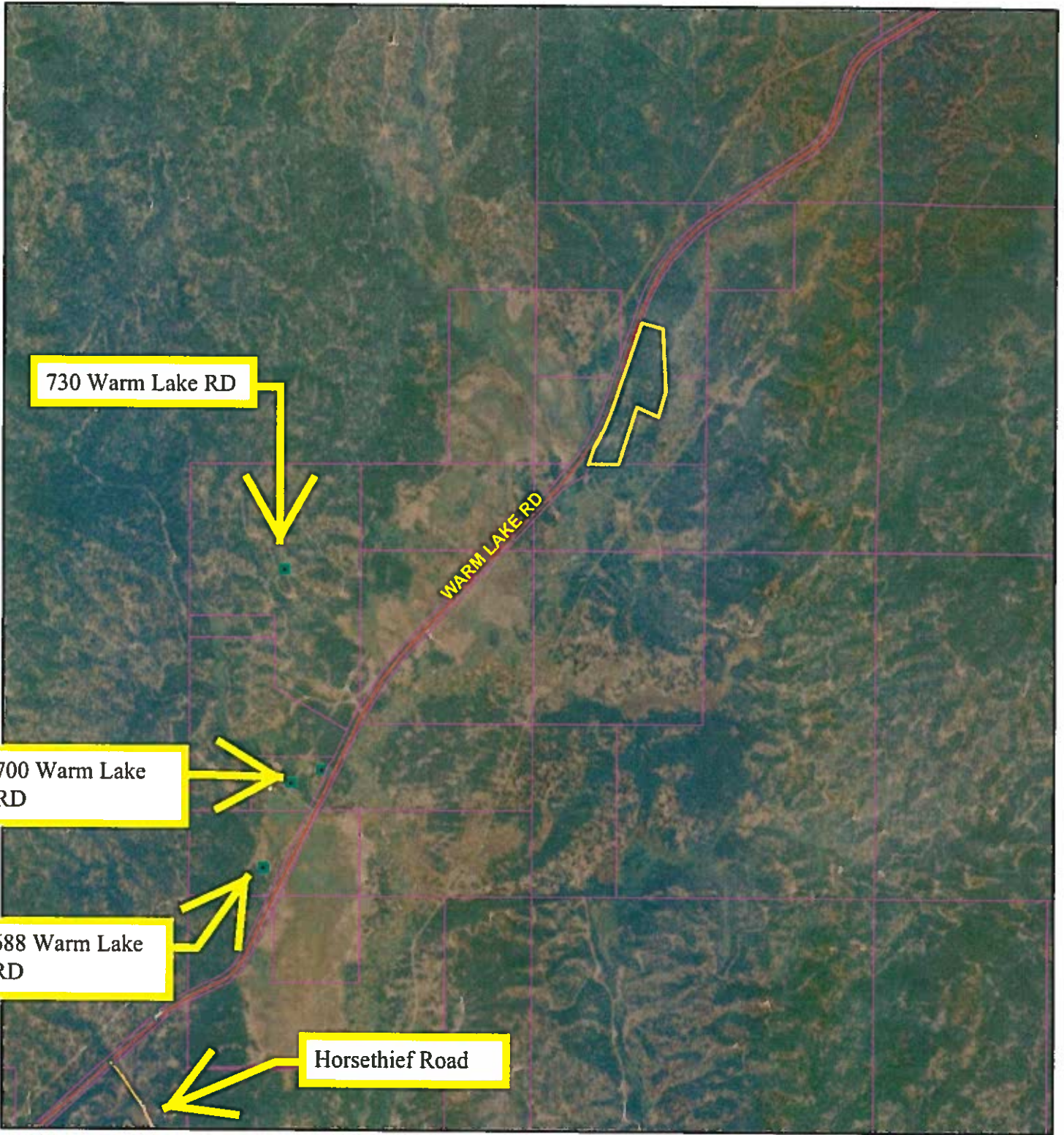
0 5 10 Miles

LEGEND

- Burntlog Route
- Power Line Upgrade
- New Powerline
- Existing Power Line
- Existing Roads
- Railroad
- Upgraded Substation
- New Substation
- Existing Substation



C.U.P. 20-12 vicinity



6/3/2020, 9:20:22 AM

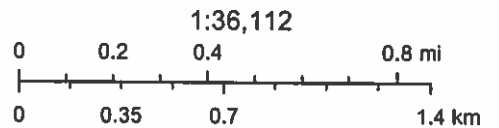
Parcel Boundaries Roads

Addresses

All Road Labels

MINOR COLLECTOR

URBAN/RURAL



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

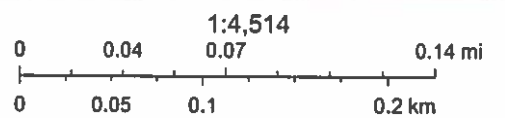
C.U.P. 20-12 aerial

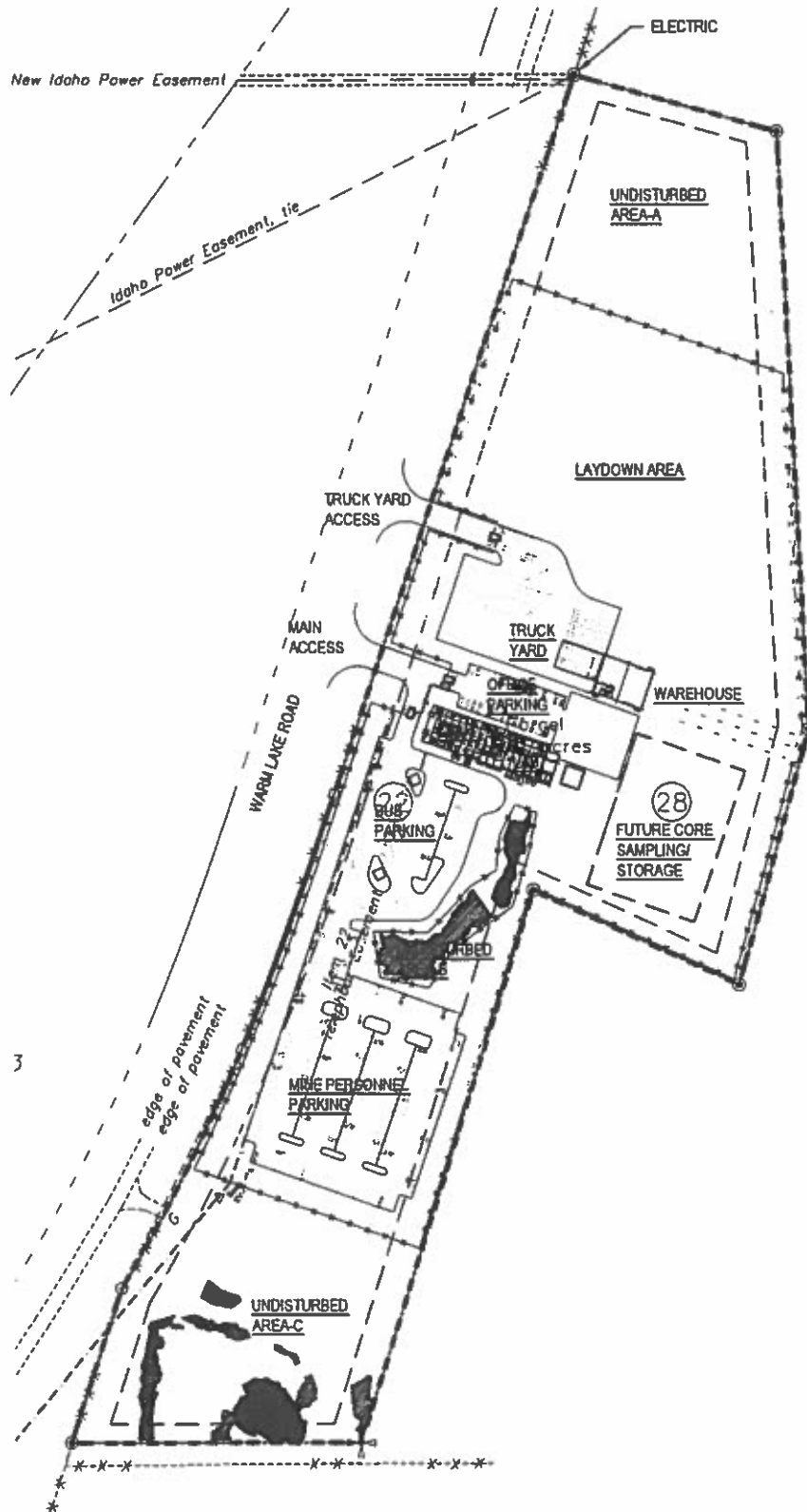


6/3/2020, 9:12:48 AM

 Parcel Boundaries

All Road Labels





LOGISTICS FACILITY OVERALL SITE PLAN

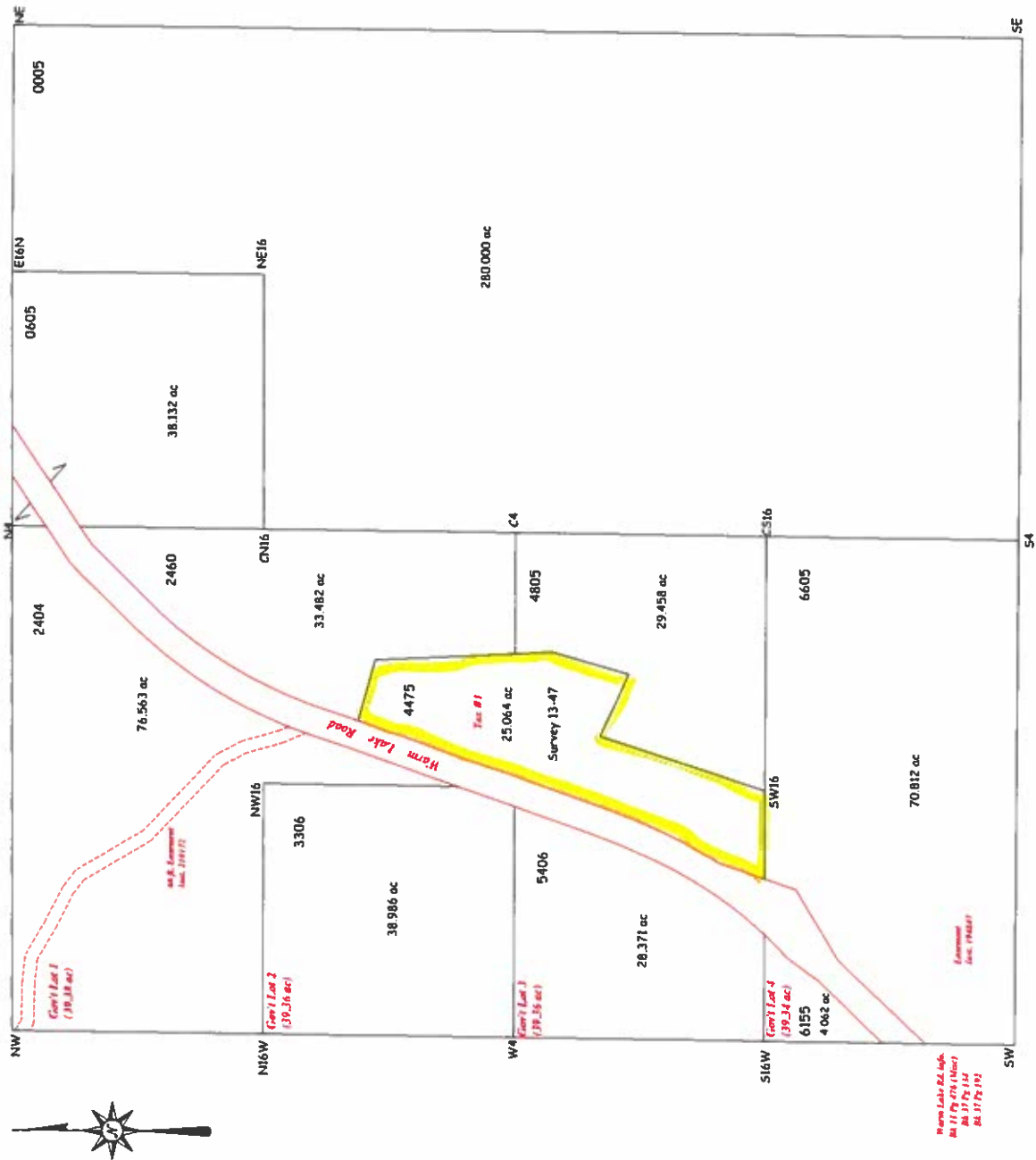


PLAT TITLE

T W P . 1 4 N R O S E S E C . 0 7

VALLEY COUNTY
Assessor's Office
Cartography Dept.
Cascade, ID 83611

Filename: H:\spch\Valley County Base Map
Scale:
Date: 7/5/18
Drawn by: L. Fredrick



Warm Lake 22.46 ac
24.17 ac
28.17 ac
28.17 ac

Instrument # 407068
 VALLEY COUNTY, IDAHO
 Surveyed by Russell Surveying, Inc.
 Registered Professional Surveyor
 License No. 10000
 Date of License: 10/15/2016
 Made by RETURNED TO SENDER

RECORDERS STAMP
 Book 13, Page 47
 of Records of Surveys.

ALTA/NSPS Land Title Survey
 Based upon Title Commitment No. 233723
 of Chicago Title Insurance Company,
 bearing an effective date of September 9, 2016

Surveyor's Certification
 I, the undersigned, Scott Valley Surveying, Inc., the Surveyor, certify that I am a duly Licensed Professional Surveyor in the State of Idaho, and that I am duly qualified to perform the duties of a Surveyor. I have personally supervised and participated in the making of the above described survey, and I have read and approved the same. I have no knowledge of any facts which would render the same inaccurate or misleading. I have no knowledge of any facts which would render the same inaccurate or misleading. I have no knowledge of any facts which would render the same inaccurate or misleading.



Date of Plot: 10/20/16
 Scott Valley Surveying, Inc.
 1100 S. Main St., Suite 100
 Pocatello, Idaho 83421

EXCEPTIONS

Survey completion is subject to recording of this plat with Valley County, Idaho.

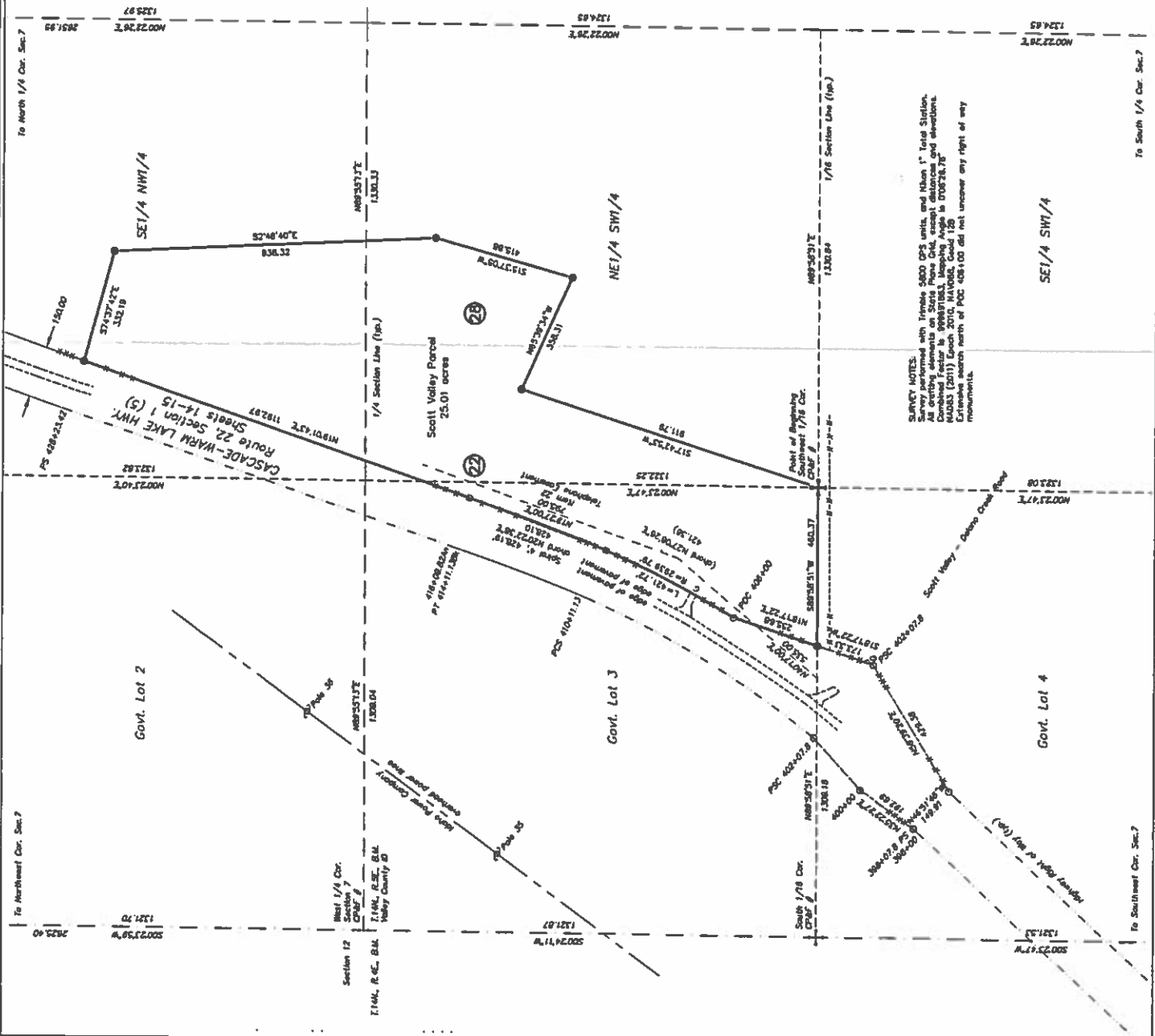


SCALE: 1" = 200'
 Bearings based on GPS derived
 State Plane Grid
 Elevations based on Goidd 12B, NAVD88

RUSSELL SURVEYING, INC.
 P.O. Box 944, 702 West Lake Blvd., Pocatello, ID 83421
 208-430-4737
 russell@russellid.com

Drawn: 10/20/16 DATE: 9/22/16 SHEET: 1 of 1
 CS (Scale) at 9/24-27, 10/6-20
 (C) Scott Valley Surveying, Inc. All Rights Reserved

ALTA - NSPS Land Title Survey
IDAHO GOLD RESOURCES COMPANY, LLC
 Scott Valley Parcel
 situated in the
 Southeast 1/4 Northwest 1/4,
 Northeast 1/4 Southwest 1/4 & Govt. Lot 3
 Section 7, T.14N., R.5E., B.M.
 Valley County, Idaho
 Russell Surveying, Inc. - McCall, Idaho
 October 2016
 10/20/16 Sheet 1 of 2



SURVEY NOTES:
 Survey performed with Trimble 5600 GPS units, and Mann 1" Total Station.
 All bearings and distances are based on the State Plane Grid.
 Combined Factor is 999987183.1. Magnetic Azimuth is 010028287.
 MADS3 (2011) Epoch 2010, NAVD88, Goidd 12B
 Extensive search north of POC 056100 did not uncover any right of way
 monuments.

6-25-2020





CENTRAL DISTRICT HEALTH DEPARTMENT
Environmental Health Division

Return to:

- Cascade
- Donnelly
- McCall
- McCall Impact
- Valley County

Rezone # _____

Conditional Use # CUP 20-12

Preliminary / Final / Short Plat _____

Midias Gold IDAHO INC
Sec 7

- 1. We have No Objections to this Proposal.
- 2. We recommend Denial of this Proposal.
- 3. Specific knowledge as to the exact type of use must be provided before we can comment on this Proposal.
- 4. We will require more data concerning soil conditions on this Proposal before we can comment.
- 5. Before we can comment concerning Individual sewage disposal, we will require more data concerning the depth of:
 - high seasonal ground water
 - bedrock from original grade
 - waste flow characteristics
 - other _____
- 6. This office may require a study to assess the impact of nutrients and pathogens to receiving ground waters and/or surface waters.
- 7. This project shall be reviewed by the Idaho Department of Water Resources concerning well construction and water availability.
- 8. After written approval from appropriate entities are submitted, we can approve this proposal for:
 - central sewage
 - interim sewage
 - individual sewage
 - community sewage system
 - central water
 - individual water
 - community water well
- 9. The following plan(s) must be submitted to and approved by the Idaho Department of Environmental Quality:
 - central sewage
 - sewage dry lines
 - community sewage system
 - central water
 - community water
- 10. Run-off is not to create a mosquito breeding problem.
- 11. This Department would recommend deferral until high seasonal ground water can be determined if other considerations indicate approval.
- 12. If restroom facilities are to be installed, then a sewage system MUST be installed to meet Idaho State Sewage Regulations.
- 13. We will require plans be submitted for a plan review for any:
 - food establishment
 - beverage establishment
 - swimming pools or spas
 - grocery store
 - child care center

14. CDHD has issued a septic permit for this facility.
Water system may have to be a public water system. Applicant will need to
verify with DEQ with regards to water system requirements.
 Reviewed By: LHP
 Date: 6/15/20



Cascade Rural Fire Protection District
P. O. Box 825
109 East Pine Street
Cascade, Idaho 83611-0825
208.382.3200 – Phone
208.382.4222 – Fax

July 9, 2020

TO: Cynda Herrick
Valley County Planning and Zoning

RE: CUP 20-12 Stibnite Gold Project Logistics Facility

The proposed Stibnite Gold Logistics Facility located off Warm Lake Road in Scott Valley is outside of Cascade Rural Fire Protection District's (CRFPD) boundary. The Valley County Sheriff requested CRFPD's assistance with reviewing the site plans.

All Apparatus Access Roads shall be built to the International Fire Code Standards 2015. Section 503 Fire Apparatus Access Roads explains the standard to which the roads shall be built to.

- **503.2.1 Dimensions.** Fire apparatus access roads shall have an unobstructed width of not less than 20 feet, exclusive of shoulders, and an unobstructed vertical clearance of not less than 13 feet 6 inches.
- **503.2.3 Surface.** Fire Apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all weather driving capabilities.

The plan states that a well will also be used for fire protection at the Logistics Facility. Fire flow shall be sufficient for the type of building and construction of building as required by the International Fire Code Appendix B, Fire Flow Requirements for Buildings.

If you have additional questions, please contact me

Steven Hull
Fire Chief
Cascade Rural Fire District
steve@cascaderuralfire.com

APPENDIX B

FIRE-FLOW REQUIREMENTS FOR BUILDINGS

The provisions contained in this appendix are not mandatory unless specifically referenced in the adopting ordinance.

SECTION B101 GENERAL

B101.1 Scope. The procedure for determining fire-flow requirements for buildings or portions of buildings hereafter constructed shall be in accordance with this appendix. This appendix does not apply to structures other than buildings.

SECTION B102 DEFINITIONS

B102.1 Definitions. For the purpose of this appendix, certain terms are defined as follows:

FIRE-FLOW. The flow rate of a water supply, measured at 20 pounds per square inch (psi) (138 kPa) residual pressure, that is available for fire fighting.

FIRE-FLOW CALCULATION AREA. The floor area, in square feet (m²), used to determine the required fire flow.

SECTION B103 MODIFICATIONS

B103.1 Decreases. The fire chief is authorized to reduce the fire-flow requirements for isolated buildings or a group of buildings in rural areas or small communities where the development of full fire-flow requirements is impractical.

B103.2 Increases. The fire chief is authorized to increase the fire-flow requirements where conditions indicate an unusual susceptibility to group fires or conflagrations. An increase shall not be more than twice that required for the building under consideration.

B103.3 Areas without water supply systems. For information regarding water supplies for fire-fighting purposes in rural and suburban areas in which adequate and reliable water supply systems do not exist, the *fire code official* is authorized to utilize NFPA 1142 or the *International Wildland-Urban Interface Code*.

SECTION B104 FIRE-FLOW CALCULATION AREA

B104.1 General. The fire-flow calculation area shall be the total floor area of all floor levels within the *exterior walls*, and under the horizontal projections of the roof of a building, except as modified in Section B104.3.

B104.2 Area separation. Portions of buildings which are separated by *fire walls* without openings, constructed in accordance with the *International Building Code*, are allowed to be considered as separate fire-flow calculation areas.

B104.3 Type IA and Type IB construction. The fire-flow calculation area of buildings constructed of Type IA and Type IB construction shall be the area of the three largest successive floors.

Exception: Fire-flow calculation area for open parking garages shall be determined by the area of the largest floor.

SECTION B105 FIRE-FLOW REQUIREMENTS FOR BUILDINGS

B105.1 One- and two-family dwellings, Group R-3 and R-4 buildings and townhouses. The minimum fire-flow and flow duration requirements for one- and two-family *dwellings*, Group R-3 and R-4 buildings and townhouses shall be as specified in Tables B105.1(1) and B105.1(2).

B105.2 Buildings other than one- and two-family dwellings, Group R-3 and R-4 buildings and townhouses. The minimum fire-flow and flow duration for buildings other than one- and two-family *dwellings*, Group R-3 and R-4 buildings and townhouses shall be as specified in Tables B105.2 and B105.1(2).

**TABLE B105.1(1)
REQUIRED FIRE-FLOW FOR ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3 AND R-4 BUILDINGS AND TOWNHOUSES**

FIRE-FLOW CALCULATION AREA (square feet)	AUTOMATIC SPRINKLER SYSTEM (Design Standard)	MINIMUM FIRE-FLOW (gallons per minute)	FLOW DURATION (hours)
0-3,600	No automatic sprinkler system	1,000	1
3,601 and greater	No automatic sprinkler system	Value in Table B105.1(2)	Duration in Table B105.1(2) at the required fire-flow rate
0-3,600	Section 903.3.1.3 of the <i>International Fire Code</i> or Section P2904 of the <i>International Residential Code</i>	500	1/2
3,601 and greater	Section 903.3.1.3 of the <i>International Fire Code</i> or Section P2904 of the <i>International Residential Code</i>	1/2 value in Table B105.1(2)	1

For SI: 1 square foot = 0.0929 m², 1 gallon per minute = 3.785 L/m.

TABLE B105.1(2)
REFERENCE TABLE FOR TABLES B105.1(1) AND B105.2

FIRE-FLOW CALCULATION AREA (square feet)					FIRE-FLOW (gallons per minute) ^b	FLOW DURATION (hours)
Type IA and IB ^a	Type IIA and IIIA ^a	Type IV and V-A ^a	Type IIB and IIIB ^a	Type V-B ^a		
0-22,700	0-12,700	0-8,200	0-5,900	0-3,600	1,500	2
22,701-30,200	12,701-17,000	8,201-10,900	5,901-7,900	3,601-4,800	1,750	
30,201-38,700	17,001-21,800	10,901-12,900	7,901-9,800	4,801-6,200	2,000	
38,701-48,300	21,801-24,200	12,901-17,400	9,801-12,600	6,201-7,700	2,250	
48,301-59,000	24,201-33,200	17,401-21,300	12,601-15,400	7,701-9,400	2,500	
59,001-70,900	33,201-39,700	21,301-25,500	15,401-18,400	9,401-11,300	2,750	
70,901-83,700	39,701-47,100	25,501-30,100	18,401-21,800	11,301-13,400	3,000	3
83,701-97,700	47,101-54,900	30,101-35,200	21,801-25,900	13,401-15,600	3,250	
97,701-112,700	54,901-63,400	35,201-40,600	25,901-29,300	15,601-18,000	3,500	
112,701-128,700	63,401-72,400	40,601-46,400	29,301-33,500	18,001-20,600	3,750	
128,701-145,900	72,401-82,100	46,401-52,500	33,501-37,900	20,601-23,300	4,000	4
145,901-164,200	82,101-92,400	52,501-59,100	37,901-42,700	23,301-26,300	4,250	
164,201-183,400	92,401-103,100	59,101-66,000	42,701-47,700	26,301-29,300	4,500	
183,401-203,700	103,101-114,600	66,001-73,300	47,701-53,000	29,301-32,600	4,750	
203,701-225,200	114,601-126,700	73,301-81,100	53,001-58,600	32,601-36,000	5,000	
225,201-247,700	126,701-139,400	81,101-89,200	58,601-65,400	36,001-39,600	5,250	
247,701-271,200	139,401-152,600	89,201-97,700	65,401-70,600	39,601-43,400	5,500	
271,201-295,900	152,601-166,500	97,701-106,500	70,601-77,000	43,401-47,400	5,750	
295,901-Greater	166,501-Greater	106,501-115,800	77,001-83,700	47,401-51,500	6,000	
—	—	115,801-125,500	83,701-90,600	51,501-55,700	6,250	
—	—	125,501-135,500	90,601-97,900	55,701-60,200	6,500	
—	—	135,501-145,800	97,901-106,800	60,201-64,800	6,750	
—	—	145,801-156,700	106,801-113,200	64,801-69,600	7,000	
—	—	156,701-167,900	113,201-121,300	69,601-74,600	7,250	
—	—	167,901-179,400	121,301-129,600	74,601-79,800	7,500	
—	—	179,401-191,400	129,601-138,300	79,801-85,100	7,750	
—	—	191,401-Greater	138,301-Greater	85,101-Greater	8,000	

For SI: 1 square foot = 0.0929 m², 1 gallon per minute = 3.785 L/m, 1 pound per square inch = 6.895 kPa.

a. Types of construction are based on the *International Building Code*.

b. Measured at 20 psi residual pressure.

TABLE B105.2
REQUIRED FIRE-FLOW FOR BUILDINGS OTHER THAN ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3 AND R-4 BUILDINGS AND TOWNHOUSES

AUTOMATIC SPRINKLER SYSTEM (Design Standard)	MINIMUM FIRE-FLOW (gallons per minute)	FLOW DURATION (hours)
No automatic sprinkler system	Value in Table B105.1(2)	Duration in Table B105.1(2)
Section 903.3.1.1 of the <i>International Fire Code</i>	25% of the value in Table B105.1(2) ^a	Duration in Table B105.1(2) at the reduced flow rate
Section 903.3.1.2 of the <i>International Fire Code</i>	25% of the value in Table B105.1(2) ^b	Duration in Table B105.1(2) at the reduced flow rate

For SI: 1 gallon per minute = 3.785 L/m.

a. The reduced fire-flow shall be not less than 1,000 gallons per minute.

b. The reduced fire-flow shall be not less than 1,500 gallons per minute.

B105.3 Water supply for buildings equipped with an automatic sprinkler system. For buildings equipped with an approved *automatic sprinkler system*, the water supply shall be capable of providing the greater of:

1. The *automatic sprinkler system* demand, including hose stream allowance.
2. The required fire-flow.

SECTION B106 REFERENCED STANDARDS

ICC	IBC—15	International Building Code	B104.2,
			Tables
ICC	IFC—15	International Fire Code	B105.1(1) and B105.2
ICC	IWUIC—15	International Wildland- Urban Interface Code	B103.3
ICC	IRC—15	International Residential Code	Table B105.1(1)
NFPA	1142—12	Standard on Water Supplies for Suburban and Rural Fire Fighting	B103.3

RECEIVED

JUL 08 2020

RECEIVED

JUL 8 2020

To Valley County planning and Zoning!

It's an absolute fact that the only way Stibnite will ever get cleaned up is with future mining and the most extensive environmentally friendly plan ever devised and by Midas Gold. This company has worked long and hard to change how mining is done not only with this site but throughout the state of Idaho with new mining laws and environmental and restoration practices. It is a patented claim and they have a right to mine it.

Valley County has a long history of Conservative values that has enriched us before with Logging and mining jobs and will do so again. At a time when our Country is dependent on slave labor and poor mining practices around the world to supply us with minerals and metals, now is the perfect opportunity to correct this Globalist nightmare that's been created by Save the south fork, Idaho rivers united and other conservative groups that want our jobs shipped overseas to pad the pockets of their globalist funded groups. Any input from these groups should be ignored, they are not patriots to this land.

As to the logistics facility in Scott Valley, this is the perfect location for staging people. It's also a location that will add some 50 jobs or so right here to the local economy and at some point, will disappear once mining operations conclude. This will reduce traffic significantly on Warm Lake Road. By the plans will be a dark sky's area so lighting will be minimal. No one will be allowed to drive their own vehicles to the mine itself. Busing will occur from this site, more jobs! This property has been for sale for some time and now it will be utilized and will fit with the economic development of and zoning goals of Valley County.

My hope is that Valley County Government does all it can to enhance the economics of this area! We need this project badly, the Covid crisis has demonstrated just that! This mine would have been considered essential to the Countries needs and would have continue to pump vital dollars into the local economy!

Thank you; Dan & Chris Davis
508 N. Idaho St.
Cascade. Idaho

From: Bette Bruett <bbruett@hotmail.com>

Sent: Thursday, July 9, 2020 9:22 AM

To: Cynda Herrick <cherrick@co.valley.id.us>

Subject: Approval request for Midas Gold's Conditional Use Application for the logistics facility in Scott Valley.

Below please find my request for the Valley County Commissioners approval of Midas Gold's Conditional Use Application for the logistics facility in Scott Valley.

July 9, 2020

TO: Valley County Commissioners (Planning and Zoning Commission)

RE: Approve the Conditional Use Permit for Midas Gold Idaho's Stibnite Gold Logistics Facility
Dear Commissioners,

The Valley County Planning and Zoning should approve the conditional use permit (CUP 20-12) for Midas Gold Idaho to build their Stibnite Gold Logistics Facility.

My name is Bette Bruett. My grandfather, Gustav Muller, built our original family cabin at Warm Lake in 1934. Our family has continued to enjoy the beautiful lake and area ever since. I have been coming to the cabin for 78 years. Since I retired in 2005, my family and I live from April into November at this cabin. In the winter months several of the family members enjoy the winter sports and stay in the cabin.

I have attended many of the Midas Gold meetings and visited the site at Stibnite. I was amazed at what Midas Gold has done to improve the environment of that whole area. I saw it before they started and couldn't believe the difference. I have been studying the information that they have provided, for the past several years, describing the procedures and processes that they will be doing in order to facilitate the mining at Stibnite. I am strongly supportive for the Logistics Facility in Scott Valley (facility). It will provide a central location for transporting employees to and from the mine, decreasing the amount of traffic on the Warm Lake highway, as well as, improve the environment. It will also employ many local residents at the facility at wages higher than they currently make, which in turn, will add significant revenue to the tax base. It will also have a positive impact on housing affordability in Valley County.

I would ask that you approve the Conditional Use Permit for the Stibnite Gold Logistics Facility.

Thank you.

Bette Bruett

183 Lake Shore Place

Warm Lake, ID 83611

(208) 632-6603

David and Kacie Bracht
26 Goslin Loop
Cascade, ID 83611
208-818-1720/208-315-5083

7/9/2020

Re: Stibnite Gold Logistics Facility

Dear Ms Herrick,

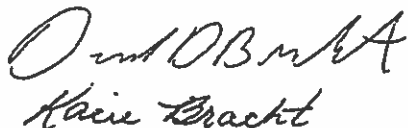
It is a pleasure of ours to write a letter of support for the construction of the Stibnite/Midas Gold Logistics Facility in Scott Valley and the opportunities that the Midas Gold Project brings to Valley County

As longtime residents of Valley County we are excited to see the economic impact that this project will have in our community. This site alone will create 50+ jobs, working, Monday-Friday from 8am-5pm allowing employees to return home in the evening to be with their families. Midas is committed in hiring local and pays above average salaries with benefits, making it easier to live and recreate in Valley County. This does not even take into account for all of the other supporting jobs that will be created indirectly (restaurants, hospital, hotel/motel, grocers, etc.). We will see an increased number of people visiting our community while generating thousands of dollars in state, local and federal taxes.

Through this process we have seen Midas Gold diligently working with the community to address and identify any foreseen issues, including traffic to and from site. This facility will allow for many employees to park at the logistics facility and carpool which will reduce the number of people traveling to the Stibnite site reducing traffic which will promote safer roads.

We fully support the Stibnite/Midas Gold Logistics Facility and ask that the Valley County Planning and Zoning Commission to issue the conditional use permit for construction of this facility. Midas Gold is an asset to have within our community.

Thank you,

Handwritten signature of David and Kacie Bracht in cursive script.

David and Kacie Bracht

From: charles jamerson <bc_jamer@yahoo.com>
Sent: Thursday, July 9, 2020 2:42 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Fw: Midas Gold CUP Letter

----- Forwarded Message -----

From: Hayley Rambur <hrambur@midasgoldinc.com>
To: bc_jamer@yahoo.com <bc_jamer@yahoo.com>
Sent: Thursday, July 9, 2020, 02:31:38 PM MDT
Subject: Midas Gold CUP Letter

cherrick@co.valley.id.us

July 9, 2020

Dear Planning & Zoning Administrator Herrick,

My name is Charles Jamerson, I am a long-time property owner and Valley County resident whose property will be in very close proximity to the proposed logistics facility. I am writing to encourage the Valley County Planning and Zoning Commission to approve the conditional use permit (CUP 20-12) for Midas Gold Idaho to construct a Stibnite Gold Logistics Facility outside of Cascade.

During their time studying the Stibnite mining district, Midas Gold has developed extensive ties to members of the community. As a result, the company has been able to prioritize the concerns and needs of people here.

This facility will be crucial to support Midas Gold's objective of carrying out a modern, sustainable mining operation at Stibnite. It will also create a steady stream of high-paying jobs for Idahoans, improving employment opportunities for families in this area.

As a resident close to the proposed facility, it is important to me that Midas has taken the time and care to design the Logistics Facility to reduce traffic to the mine and help keep our roads safe.

The logistics facility will serve as a central hub for operations and building this site will allow Midas to put sustainable mining into practice. In fact, the purpose of this logistics facility is to enable a more environmentally and community conscious project. As detailed by Midas Gold in their application for the permit, the logistics facility will keep roads safer by reducing traffic along the main highways that lead up to their site of operations. Fewer cars on the road also reduces emissions and greatly decreases sediment and dust from transportation, greatly scaling back the environmental impact.

Midas will bus employees from the facility to and from the mining site and the plan to use a logistics facility only a few miles from Cascade will bring economic activity to our community. Furthermore, busing employees to the site reduces the risk of accidents and makes the commute easier and safer for many people including those in Valley County. Using

the facility for employees to gather and park their vehicles and locating this near Cascade will bring increased economic activity to our community.

The logistics facility will also reduce light pollution. As a local resident, I like the idea that being smart about lighting will reduce the impact this facility will have on our current environment and rural feel. The facility will scale down the number of lights by half and will point all lighting systems downward. Steps like these ensure that Midas is reducing its footprint. This is why they have earned the trust and appreciation of the community.

The Stibnite Gold Project will be complemented by this logistics facility. It will enable Midas to put sustainable mining into practice and is designed to address the environmental concerns of this region.

As a resident of the Cascade area I hope we do everything we can to encourage this business to locate the hub of its business activities in our area. This is an enormous boon for our economy and our current residents to have this opportunity at our doorstep.

Therefore, I urge the Commission to approve Midas Gold's Conditional Use Permit 20-12 and allow them to build the Stibnite Gold Logistics Facility for the above stated reasons. Thank you for your consideration.

Charles Jamerson



P.O. Box 1808, McCall, ID 83638
www.savethesouthforksalmon.com

July 8, 2020

BY ELECTRONIC MAIL - please confirm receipt

Re: Comments on CUP 20-12 (Stibnite Gold Logistics Facility)

Dear Planning and Zoning Commissioners:

Thank you for the opportunity to comment on Midas Gold Idaho, Inc.'s Conditional Use Permit (CUP) application for the Stibnite Gold Logistics Facility (SGLF) (CUP 20-12). The application seeks approval to build four buildings, which include an administrative office/assay laboratory; a warehouse; a hazardous materials storage building; and a core sampling and storage building on 25 acres of vacant land off Warm Lake Road. The application also seeks approval to construct a truck staging facility and 300-space parking lot. The completed SGLF with the parking lot proposes to pave over approximately 70 percent of the 25-acre vacant lot (CUP Application at 3).

Save the South Fork Salmon (SSFS) is a community-based citizens' organization, headquartered in Valley County, Idaho, dedicated to protecting the South Fork of the Salmon River watershed, its outstanding and remarkable natural values, and the economies that depend on those values. SSFS's members and supporters have a strong interest in protecting natural resources, maintaining recreational opportunities and access, and ensuring future generations can enjoy and benefit from these resources and opportunities in the South Fork of the Salmon River watershed. SSFS's members and supporters have participated in the Stibnite Gold Project (SGP) environmental review process under the National Environmental Policy Act (NEPA) since the Payette National Forest (PNF) opened the scoping comment period in 2017, and have made significant investments in time and resources to better understand the project proposed by Midas Gold Corp. and its wholly owned subsidiaries Midas Gold Idaho, Inc., Stibnite Gold Company, and Idaho Gold Resources Company, LLC (collectively, MGII).

Many of SSFS's members and supporters, including the authors of these comments, utilize the Warm Lake road regularly for a host of activities, including family camping,

road-biking, wildlife observation, scenery appreciation, birding, access to hunting and fishing, two-wheel and four-wheel motorized recreation, power boating, snowmobiling, whitewater kayaking, rock climbing, backcountry skiing, hiking, firewood cutting, berry and mushroom picking, mountain biking, wilderness recreation, and private land access--to name just a few.

The Warm Lake road is a premier example of the rural character of Valley County: farms; ranches; trees; open land. It is also an important backcountry access route, currently with limited industrial traffic. Allowing industrial development on the Warm Lake Road is a significant, irreversible, and adverse change, and is the first step in the evolution of the area between the proposed SGLF and Cascade into an industrial corridor. Approval of CUP 20-12 is a *de facto* establishment of an 8.5-mile heavy industrial zone along the Warm Lake road. If CUP 20-12 is approved it will set precedent for future industrial development along the Warm Lake road, which may include heavy truck traffic associated with the SGP. Frankly, it will be difficult to deny future requests for industrial use along the Warm Lake road.

The Valley County Comprehensive Plan has a goal to retain the rural/small town character enjoyed by residents and visitors. MGII bears the burden of proof that any of its proposed activities will not conflict with this goal, and not cause undue impacts and/or harm, cause injury to, or seriously degrade the health and well-being of county taxpayers, and anyone who travels to experience the bountiful amenities of Valley County and spend their money here. The application before the Planning and Zoning Commission does not address these premises.

To avoid any appearance of conflict of interest and to avoid tainting any action by the Planning and Zoning Commission on this application, we request that Ms. Johanna Defoort declares a conflict of interest and recuses herself from any discussion of, or vote on, this application. If Ms. Defoort is unwilling to do this, SSFS requests that the Planning and Zoning Commission table any further action on this application until the issue of conflict is resolved. SSFS requests that any *ex parte* contacts between the applicant and any member of the Planning and Zoning Commission, and Planning and Zoning staff also be disclosed. SSFS submits for the record that Ms. Defoort is listed as an employee of Midas Gold Idaho, Inc.¹, and that any *ex parte* contacts between Ms. Defoort and Planning and Zoning Commissioners or staff pertaining to this application must be disclosed. Idaho law forbids the non-disclosure of a financial conflict of interest by members or employees of a governing board or planning and zoning commission. *See* Idaho Code § 67-6506 (“A knowing violation of this section shall be a misdemeanor.”).

¹ See www.midasgoldidaho.com/about/ (website last visited on July 7, 2020).

CUP application 20-12 is substantially incomplete. It omits information required by the Valley County ordinance and contains incorrect and misleading information. For this reason the application must be denied.

A. The Impact Report fails to consider new traffic generated by the SGLF.

The Impact Report provides a succinct description of the current conditions of the State 55 Highway corridor and associated intersections, but completely eliminates any discussion of how the traffic to and from the SGLF will impact these roadways.² Impact Report at 2-1--2-2. Rather than discuss the actual impacts, it states that the current “congestion occurs with or without the SGLF.” *Id.* at 2-1.

A closer look at the Transportation Impact Study shows that during construction and mine operation nearly 70 vehicles--approximately 20 light vehicles and 50 heavy vehicles--will travel from either the north or south direction of Highway 55 up Warm Lake Road to the SGLF *every day*, most occurring during the peak traffic months of May through November. Impact Report, Appx. B at 14 (Table 1). These “heavy vehicles” will include trucks transporting hazardous materials and explosives, and antimony from the mine site, which *will not* be the responsibility of Midas Gold after it leaves the mine. But, the Impact Report fails to mention how this *new* traffic will impact the highway corridor or traffic on Warm Lake Road despite the fact that “all” SGLF traffic “will travel on SH-55 to Warm Lake Road.” *Id.* at 13. It fails to analyze the impact of heavy truck traffic on those traveling up Warm Lake Road from the Highway to important recreation sites, including Horsethief Reservoir, Warm Lake, and the South Fork of the Salmon River, or to Yellow Pine. It fails to discuss the impacts of heavy truck traffic traveling through the Deinhard/Boydston corridor through McCall, *see id.* at 14, which is also a bike corridor and crosses paths with a bike pathway. There is no discussion of the impacts to pedestrians.

Even more, the description in the Impact Report of anticipated vehicular travel and that discussed in the Transportation Impact Study are inconsistent. The Transportation Impact Study--which anticipates approximately 20 trips of light vehicle traffic a day to and from the SGLF, *Id.* at 14--appears to disregard light vehicle traffic from employees coming from surrounding communities to the SGLF to either work there (an estimated 36-40 employees) or to take van pools up to the Stibnite mine (estimated in the hundreds). Disregard of this type of traffic appears to lie with the incorrect assumption that employees “will use mine-provided buses *from McCall, Donnelly, Cascade, and other communities* en route to the mine.” Impact Report, Appx. B. at 13 (emphasis added). If this is the case then why propose a 300-space parking lot at the SGLF? The Impact Report, on the other hand, only states that

² Much of the discussion about a reduction in traffic volume focuses on the consolidation of vehicles that begins at the SGLF and continues en route to the mine site.

buses will be used from the SGLF to the mine site, and not from surrounding communities to the SGLF. *See* Impact Report at 1-2 (“Buses and vans will transport employees and contractors to the Stibnite Gold Project site from the Logistics Facility.”). The Transportation Impact Study appears to thus underestimate the potential traffic generated by the operation of the SGLF. This oversight results in a failure to provide the public with a realistic assessment of how the SGLF will impact traffic patterns throughout Valley County and Adams County, where 104 to 335 employees of the Stibnite Gold mine are expected to live. *See* Impact Report at 2-2 (stating that 20-50% of the 524-670 mine employees are anticipated to live in Valley or Adams County).

The Impact Report and Transportation Impact Study are incomplete, inconsistent, and cannot be relied on by this Commission to make a reasonable determination to approve CUP 20-12. Therefore, this application must be denied.

B. The Impact Report erroneously concludes that the SGLF will not impact housing affordability.

The Impact Report states that there are no planned residential facilities at the site, and therefore the SGLF “would not impact housing affordability directly.” Impact Report at 2-2. The Report then shifts focus to the anticipated impacts on affordable housing of the actual Stibnite Gold Project, claiming that although anywhere between 104 and 335 people working for the Stibnite Gold Project will reside in Valley or Adams County, the Stibnite Gold Project’s planned housing at the mine site along with high-paying jobs will have an “indirect positive impact on housing affordability in Valley County.” *Id.* By making this erroneous and conclusory statement, the Impact Report attempts to circumvent the requirement to provide a “[p]rovision for the mitigation of impacts on housing affordability,” as required under Valley County Code 9-5-3(D)(2)(b).

Citing the 2018 Highland Economic Study,³ the Impact Report estimates there will be 26-30 jobs at the SGLF. There is no indication that those employees will live at the Stibnite Gold Project’s planned “housing at the mine site.” Impact Report. at 2-2. In fact, the location of the SGLF--only 8.5 miles from Cascade--suggests otherwise. Moreover, even if these employees were expected to live at the housing at the mine site, there is no indication in the CUP application that any mine-site housing will be available before the SGLF is completed and people start working there. It is entirely possible--in fact, probable--that these 26-30 “highly-paid” SGLF employees will be looking for housing in and around Cascade and have a direct and adverse impact on the availability and affordability of housing in Cascade and Valley County.

³ The 2018 Highland Economic Study was not attached to the CUP application. Without it, its assumptions can not be scrutinized or its conclusions verified.

The conclusion that “onsite housing and high paying jobs would have an *indirect* positive impact on housing affordability in Valley County” is also in error. I.R. at 2-2. First, its reliance on onsite housing contradicts the Highland Economic Study that states that 104 to 335 people employed for the Stibnite Gold Project will live in Valley and Adams County, and not at the onsite housing. Second, the conclusion that high-paying jobs have a positive impact on housing affordability relies on broad, unsupported, and undisclosed assumptions. To the contrary, there are many contemporary examples of rural communities experiencing economic revitalization due to a population boom and influx of high paying jobs.⁴ The results of this phenomena are an increase in demand in the housing sector, which results in an increase in cost of the surrounding housing options, i.e., less affordability. In fact, a strong case can be made that Valley County generally is experiencing this phenomenon right now. *See* Valley County Comprehensive Plan (Comp. Plan) at 39-42 (Nov. 26, 2018) (stating that the “Needs Assessment identified a striking need for affordably priced housing in Valley and Adams County.”).

Point blank, the applicant’s assertions of consistency with the Comprehensive Plan’s goals to provide for adequate affordable housing are unfounded, and the application has not described how it will meet Valley County Code 9-5-3(D)(2)(b) that requires some “[p]rovision for mitigating the impacts on housing affordability.” This application clearly attempts to side-step this provision with little regard for the Comprehensive Plan’s analysis that as “market forces continue to evolve, we can expect to see a deepening of the problems we have begun to experience with respect to affordably priced housing.” Comp. Plan at 40. Again, this application is incomplete, inconsistent, and cannot be relied on by this Commission to make a reasonable determination to approve CUP 20-12. Therefore, this application must be denied.

C. The Impact Report fails to provide an adequate assessment of noise impacts and how such impacts are to be minimized.

The Impact Report inadequately describes the noise that will be “added during construction, normal activities, and special activities.” Valley County Code 9-5-3(D)(2)(c). Construction of the facility and associated parking lots will create noise. This is endemic of any construction site large or small. But noise from the construction of the SGLF that will

⁴ *See* Texas State Affordable Housing Corporation, *Three Issues Contributing to Rural America’s Affordable Housing Crisis*, available at: <https://www.tsahc.org/blog/post/three-issues-contributing-to-rural-americas-affordable-housing-crisis> (last visited June 28, 2020) (In “Irion County, Texas (population 1,516) . . . [f]racking and wind farms have tripled the county’s energy jobs over the past six years and reduced unemployment from 5.3% to 3.2%. As a result, average monthly rents rose 44%, and the percentage of severely cost-burdened households increased from 4% to 13%.”).

only last two years is not what the Impact Report should be primarily focused on. Rather, the Impact Report should focus on the extensive and long-term noise--20+ year--from the operation of the Stibnite Gold Project and SGLF.

Although the Impact Report describes noise originating from within the facility's boundaries due to "core cutting and breaking" and "climate-control machinery (air-conditioning)," Impact Report at 2-3, the Impact Report avoids accountability of the larger noise impacts from regular intervals of "heavy equipment transshipment vehicles," some of which will be carrying loads of hazardous materials, such as antimony concentrate, sodium cyanide, ammonium nitrate, and potassium amyl xanthate. *Id.*

Moreover, the Impact Report also fails to rectify the inconsistencies between the statement that the SGLF will only be open 8am to 5pm with only "occasional weekend use," while mining activities are scheduled to run 24 hours a day, 7 days a week, 365 days a year. The Impact Report fails to "adequately address potential [noise] impacts" and fails to describe "how these impacts are to be minimized . . ." Valley County Code 9-5-3(D)(2)(c). A more descriptive analysis of the noise impacts is warranted before this Commission can make a reasonable determination on the CUP application. Therefore, this application must be denied.

D. The proposed SGLF is inconsistent with Valley County Code for maximum lot coverage and the Impact Report fails to reasonably describe the heat, glare, and light impacts.

The applicant provides a vague description of the impacts from clearing the mostly forested parcel to make way for the proposed facility. *See* Impact Report at 2-3. While not expressly noted in the application it can be deduced that 17.7 acres of the 25 acre parcel will be developed. *See* CUP Application at 3. The footprint of structures, including the "future 45,000 sq. ft. building" is approximately 1.5 acres, the "laydown area" is 5.6 acres, and the parking lots and driveways comprise approximately 10.6 acres. *Id.* The only other paved areas in Valley County of this magnitude are the airports, and the Ridley's parking lot in McCall. Valley County Code § 9-5-4 (Table 5a) states the maximum lot cover for light industry is 35 percent. Here, the applicant proposes to cover approximately 70 percent with development. CUP Application at 3.

The heat, glare, and light that this proposed facility will create is in sharp contrast to the surrounding environment,⁵ which is far from any municipal center. The applicant confusingly states the SGLF would "contribute minimal levels of heat due to the clearing of vegetation, small engine use, reduced shade, and sun reflection from vehicles and the proposed four

⁵ Valley County Code § 9-5F-2(B)(1)(b) states that "[t]he current use of vacant adjacent property shall be presumed to be its highest and best permitted use."

buildings.” Impact Report at 2-3. Immediately following this statement, the applicant explains that constructing the buildings and vehicle sun reflection **would have heat and glare impacts.** *Id.*

The applicant must provide a more detailed analysis of the effects that 10.6 acres of pavement and 5.6 acres of laydown area would have on the surrounding environment. A simple calculation can estimate total solar radiation that reaches a 10-acre parking lot on a sunny day which amounts to over 25,000 kWh of energy per day.⁶ This can lead to unintended consequences, such as increased space conditioning loads in adjacent buildings during the cooling season, and increased ambient air temperature in the vicinity of the site, thus altering the climatic conditions on adjacent wetlands and streams. It is also worth mentioning that captured water, especially since the applicant proposes “keeping all stormwater on site,” Impact Report at 2-4, can be heated, and if discharged into adjacent wetlands or water courses could adversely impact fish and macroinvertebrates.

While the applicant discusses landscaping and natural vegetation as a mitigation strategy, absent a more detailed plan, it is difficult not to assume that this facility will be nothing less than a large, uncovered parking lot. Parked cars could mitigate some of this solar radiation absorption. However, hundreds of cars could also create other impacts such as increased traffic on the Warm Lake road during shift changes, and concentrations of heavy metals, hydrocarbons, and other pollution incidental to passenger vehicles and trucks parked for prolonged periods of time. The applicant must present a more comprehensive mitigation plan that includes measures such as using less radiationally absorptive parking surfaces, a more detailed natural vegetation shading scheme, and provisions to mitigate for temperature and pollution of runoff into adjacent wetlands and bodies of water.

It is commendable that the applicant desires to implement “Dark Skies” principles. Yet, there are zero lights between the Horsethief Reservoir Road and the development surrounding Warm Lake. This proposed development is incompatible with the surrounding parcels in that it will require extensive amounts of lighting fixtures for operation and safety. Whether Dark Sky compliant or not, new light pollution will impact surrounding ecosystems, which include Endangered Species Act listed Northern Idaho ground squirrel, sensitive and candidate species like wolverine and gray wolf, and a wide variety of other wildlife such as deer, elk, moose, red-naped sapsucker, and flammulated owl. Goal 3 of Chapter 4 of the Comp Plan is “to protect fish and wildlife as natural resources of critical importance in Valley County.” Barring a more extensive analysis of the SGLF and the greater impacts of the larger Stibnite Gold Project, the CUP application as written fails to address this objective. The

⁶ Calculation based upon average daily solar radiation to a surface perpendicular to the sun at sea level assumed to be approximately 1000 W/m².

application is incomplete, inconsistent, and cannot be relied on by this Commission to make a reasonable determination to approve CUP 20-12. As such, it must be denied.

E. The Impact Report fails to address particulate emissions in any meaningful way.

The Impact Report fails to reasonably address the potential for particulate emission (including smoke, dust, chemicals, gases or fumes) “that may be added by the proposed uses” and how those emissions will be minimized. Valley County Code § 9-5-3(D)(2)(e). Rather, it simply states that there will be “dust and normal emissions” from construction and the various proposed activities at the SGLF. Impact Report at 2-4.

There is, however, no description of what “normal” emissions are from an assay laboratory that will be generating hazardous substances. There is no description of the number or frequency of heavy truck traffic that will be transporting core samples from the mine site to the SGLF, or heavy truck traffic transporting hazardous materials out of the SGLF, and the resulting emissions. There is no mention of how many buses or how often buses will run that will transport people from the SGLF to the mine site, or whether those buses will rely on clean fuel. There is no mention of whether emissions will be reduced by prohibiting heavy trucks or buses from idling at the truck staging facility or parking lot. The analysis is so devoid of information, neither the public nor this Commission could have any idea what the impact of the operation of the SGLF will be to the air quality over the 20+ year lifetime of the Stibnite Gold Project. Approval of this application based on the complete lack of disclosure of what type and the extent of emissions that will be generated by the operation of this facility would be arbitrary and capricious and contrary to Valley County Code. Therefore, this application must be denied.

F. Water

i. Water demand, discharge, supply source and disposal method.

The Impact Report states that “all grey water produced at the Logistics Facility will be . . . trucked offsite to a local wastewater facility.” Impact Report at 2-4. It is not disclosed, however, whether the “local” facility--presumably Cascade--will have the capacity to accept this waste. The Impact Report needs to provide more information to let the public know whether the disposal plans are viable.

ii. Surface water drainage, wetlands, and potential changes.

The Impact Report states, without support, that there will be no impacts to wetlands. Impact Report at 2-4, 2-7. Yet other statements in the Report indicate that will not be the case.

Two of the three wetlands, which are both significantly larger than the third, will be surrounded by impervious surfaces. *See* Impact Report at Appx. A; *id.* at 2-6 (“[U]ndisturbed wetland areas will help break up the parking areas and building sites.”). Impervious surfaces (parking lots and buildings) can create a host of environmental problems, including increasing the amount and velocity of stormwater runoff, which can alter natural stream flow and pollute aquatic habitats.

In this instance, the grade of the site is such that stormwater runoff will flow from these impervious surfaces from west to east and directly into the wetlands. *Id.* at 2-4. Although the Impact Report first states that stormwater runoff will be “stored on-site,” *id.*, it is only later that the Report reveals that the stormwater runoff will be directed towards the wetlands. *Id.* at 2-6 (Site grading will be conducted to provide a level parking and working area and *promote on-site stormwater runoff towards and to support wetlands* contained within the Property footprint . . .”) (emphasis added). There is no discussion of how directing stormwater runoff from a parking lot into these wetlands will adversely impact the aquatic habitat. There is also no discussion of the hydrology of the ground and, if the stormwater runoff is actually captured and stored elsewhere on-site, whether paving, or hardening, nearly 70 percent of the surface around the wetlands will allow a hydrologic balance required to maintain a healthy aquatic system, and mitigate for increased concentration of runoff volume due to impervious surfaces. Finally, if the stormwater is to be stored on-site, there is no discussion about how or where that stormwater will eventually be disposed. Assuming stormwater is collected in a container rather than in the wetlands, with a variety of light vehicles and massive transportation trucks using the facility, the stormwater is likely to be highly contaminated with chemicals, petroleum products, and sediment, and collecting and discharging this water into a surface water source would be inappropriate (and would likely require a permit under the Clean Water Act).

In the end, the Impact Report is, at best, incomplete in its description of how water resources will be impacted. The Impact Report not only is inconsistent with the requirements of Valley County’s code, as discussed above, but it is also contrary to Comprehensive Plan’s goal to “[e]ncourage the retention of existing wetlands in order to protect water quality . . .” Comp. Plan at 17. Therefore, this application must be denied.

iii. Potential changes to ground and surface water

There is nothing in the Impact Report that “[i]denif[ies] existing groundwater and surface water quality and potential changes due to this proposal.” Valley County Code 9-5-3(D)(2)(f). There is no discussion if or how drainage from stormwater runoff or snow storage will impact Big Creek. There is no discussion of the existing groundwater quality and potential changes to that water source. “Conserve and manage groundwater and surface water in all its forms in order to prevent depletion or pollution,” expresses that any proposed use must be evaluated for its impact on these resources (V.C. Comp. Plan at 17). The Impact

Report is completely devoid of any discussion of water quality impacts to ground or surface water. Full disclosure of potential impacts need to be provided before this Commission can consider this CUP application. Therefore, the application must be denied.

G. The potential for fire, explosion, and other hazards from producing, storing, and transporting hazardous chemicals is not disclosed.

Chapter 3, Goal I, Objective 5 of the Comprehensive Plan provides that the County's objective is to "[p]rotect each citizen in the community from unsafe and unhealthy conditions caused or worsened by activities, uses...or other factors located on someone else's privately owned property." Comp. Plan at 13. Here, the applicant has committed an unfortunate and egregious disservice to the Planning and Zoning Commission as well as the general public by failing to disclose and describe hazards that will exist as a result of activities associated with the SGLF.

The burden of proof that risks of harm, injury, or irreversible consequences are negligible bears on the applicant. In this case, which is atypical for Valley County, neighboring property activities are not an area of primary concern except for climatic events that may cause abnormal wildfire conditions such as prolonged drought. It is the activities associated with the operations of the SGLF that will present significant hazards which must be considered by the Valley County decision makers in order to appropriately quantify the risks associated with the SGLF and the activities carried out during its day to day operations.

The Planning and Zoning Commission should take note of the following language submitted in this section of the CUP application:

Hazardous chemicals will be transported in USDOT certified containers and by USDOT-registered transporters, who will comply with applicable USDOT, OSHA and MSHA regulations.

Personnel transporting, handling, or using any hazardous chemicals will be trained to ensure the safe use of such materials.

Hazardous chemicals will be stored pursuant to per manufacturer recommendations and OSHA regulations for safety and to prevent environmental releases.

Impact Report at 2-4, 2-5. Nowhere in this section does the applicant expressly assume any responsibility for these hazardous materials. Nowhere in the section does the applicant state what hazards will be prevalent due to the storage and handling of hazardous materials at the SGLF. Rather, although the application admits that hazardous materials will be **produced**

and stored at the SGLF, it downplays these facts by the dismissive statement that the SGLF “may store small quantities.” *Id.* at 1-2, 2-4. Notably, these materials will have to be transported on Warm Lake road to Cascade for disposal as per the Resource Conservation and Recovery Act (RCRA). *Id.* at 1-2.

Planning and Zoning Commissioners should be aware that the RCRA not only provides standards for transporters and disposal sites, but also requires standards for generators of hazardous wastes. Section 3002 of the RCRA mandates reporting and record keeping requirements by the hazardous waste generator. Section 3002(5) requires use of a manifest system to ensure that hazardous waste generated by the source is ultimately processed on site or at a facility with a section 3005 permit. This manifest system can be utilized to inform Valley County, local fire departments and EMS, and the public of the contents, characteristics, and quantities of the materials transported to and from the SGLF. Two chemicals known to be proposed for use by MGII are sodium cyanide and potassium amyl xanthate (PAX).⁷ PAX is a reactive flammable material “capable of forming flammable dust clouds in the air.”⁸ Among other hazardous materials associated with the SGLF are large quantities of ammonium nitrate and pentaerythritol tetranitrate.

The Emergency Planning and Community Right-to-Know Act (EPCRA), enacted by Congress in 1986, supports the general public’s right to know about chemical hazards within their community. The EPCRA has three basic provisions, the third being a requirement that owners and operators of hazardous waste generating facilities inform citizens about chemicals located in their communities by submitting to state and local authorities information about toxic chemical inventories, usage, manufacture, and releases. The Planning and Zoning Commission would be negligent by not requesting this information and making disclosure of this information contingent upon approving this conditional use permit. Lack of full disclosure of the hazards that the SGLF will generate, store, and/or transport is inconsistent with the Comprehensive Plan’s goal to “accommodate growth and development **while protecting quality of life within Valley County.**” Comp. Plan at 11. This goal necessarily implies that a development which poses a serious risk to the health and safety of citizens must be carefully evaluated and potential hazards mitigated. It is discouraging that the applicant would omit such important information from its application.

The applicant devotes a single vague statement concerning fire risk management, which fails to address the special circumstances arising from the activities proposed to be conducted at the SGLF. *See* Impact Report at 2-5. “Smoke detectors and fire extinguishers” may not be adequate to address a chemical release and/or explosion. The applicant must be much more

⁷ *See* draft SGP Air Quality Permit from Idaho Department of Environmental Quality.

⁸ Brenntag Canada, Inc. Potassium Amyl Xanthate MSDS.

specific about what types of activities and what types of hazardous materials will be transported to, produced on site at, stored within, and shipped away from the SGLF.

Moreover, as briefly mentioned in the application, a Spill Prevention, Control, and Countermeasure Plan under 40 C.F.R. § 112 is appropriate for fuel and oil containment. However, this is simply a *plan to make a plan* and does not address how the applicant proposes to manage its fuel storage facilities at the SGLF. The application is substantially incomplete, inconsistent, and cannot be relied on by this Commission to make a reasonable determination to approve CUP 20-12. Therefore, it must be denied.

H. The mitigation of visual impacts of the SGLF are inadequate.

SSFS requests that the Planning and Zoning Commission enact a mitigation measure that ensures, at a minimum, an opaque 50-foot vegetation buffer (such as mature native tree species) between the Warm Lake road and the razor wire fence proposed around the SGLF, and that also satisfies Section 9-11-2 of the Valley County Code.

I. Construction Description, Timing, and Sale are sufficient reasons to deny the CUP application.

The timing of the construction of the SGLF is highly speculative and based on factors which are out of the applicant's control. Without the certainty of required permits, including financial assurance guarantees, from a plethora of regulatory agencies construction of this facility is unnecessary. *See Appendix.* Without the nearly \$1 billion in capital investment needed to fund the project, the SGLF is also unnecessary. Planning and Zoning Commissioners should consider this question: Why is MGII seeking this conditional use permit now?

The applicant states that after mine closure the facility will be kept for other company purposes. What are these purposes? Are they management of in perpetuity treatment of water at the mine site? What if the economics of the mine become such that long term idling, or even abandonment becomes necessary? What assurance does the county have that the facility will not become dilapidated, or in a state of disrepair that poses a hazard to the environment or public safety? Other questions to ask pertain to storage of hazardous waste. Does MGII plan to store wastes until sufficient quantities have been generated as are necessary to facilitate proper recovery, treatment, or disposal?" *See RCRA Section 3004(j).* If so, at what quantity do the hazardous wastes become enough to be recovered, disposed, or treated? What assurances does the County have that after mining operations cease all hazardous wastes will be removed from the property?

J. The revenue and economic impact analysis is inadequate.

The objectives of Goal I on page 11 of the Comprehensive Plan include:

Maintain or improve existing levels of service as new growth occurs;

Evaluate the likely impact on the costs of services for new growth to ensure it does not create and undue hardship for Valley County residents.

Here, the applicant fails to address either of these two very important matters. Planning and Zoning must critically examine the cited Highlands Economics study. The economic impact of large scale mines, like the proposed Stibnite Gold Project, vary widely and are dependent on market forces that fluctuate based on factors well beyond the control of MGII. Here, the applicant uses this section to advance speculative assumptions about local, state, and federal tax revenue, instead of describing the realities that underlie these assumptions. For example, on page 11 of the Highlands Economics study it states, “in reality, the change in the number of jobs nationally in all SGP phases will likely be less than this estimate as much of the increased economic activity will be spread over many businesses, particularly for induced impacts related to household spending. Businesses experiencing some (but not a lot) of increased demand for their products may increase hours worked per job rather than hire new workers.” In a footnote on page 5 it states, “Average wage rates, based on Bacon-Davis prevailing wage rates for the area, are projected to range from approximately \$18 to \$30 per hour, depending on the position. Construction jobs are for electricians, laborers, truck drivers, pipe fitters, operation helps, operators, millwrights, iron-workers, cement masons, and carpenters.” In the same footnote it explains that, “a significant portion of the labor cost per job is fringe benefits and labor burden” (i.e. health insurance, workers compensation, and payroll taxes). While these are important components, they also put into perspective that wage earnings are more closely aligned with the current labor market in Valley County, rather than a financial windfall.

More evidence of the limited economic impact is contained within the local tax revenue calculation. The \$3.8 million life of mine local property contribution amounts to less than \$150,000/yr assuming a 26-28 year construction to closure time frame. While a notable per annum increase in County property tax revenue, the burden on road infrastructure, and essential public services (education, EMS, Fire, etc.) will diminish the impact of this additional revenue. Unfortunately, the Highlands Economics study does not address the associated costs of the increased activity. In fact, the authors of the study admit this critical oversight on page 1 stating, “we did not evaluate potential economic impacts due to possible effects of the Stibnite Gold Project on other economic activities, such as the recreation or tourism industry.” As such, this analysis, commissioned by MGII, should be evaluated in light of what it is lacking. It offers no meaningful comparison for which to base economic impacts on Valley County

with, or without the Stibnite Gold Project. In short this is simply a cost estimate from which MGII can estimate its capital and operational expenditures to further evaluate the financial risks associated with its proposed mine. The study relied upon by the applicant is misleading and cannot be relied on by this Commission to make a reasonable determination to approve CUP 20-12. Therefore, this application must be denied.

K. Natural resource use may be impacted by the proposed SGLF.

SSFS appreciates the applicant stating its adherence to the terms of its Grant Deed for transfer of property signed by David A. Little on October 28, 2016. Impact Report at 2-7 (“No natural resources or materials would be used at or near the Property to produce products at the Logistics Facility”). However, the applicant does not address that its proposed activities may conflict with Goal I Chapter 13 of the Valley County Comprehensive Plan. Further, Warm Lake is one of a handful of designated “tourist hubs.”⁹ Services, presumably tourism-based ones, are encouraged to locate to these hubs. The Planning and Zoning Commission’s deliberations must consider impacts that increased industrial activity will have on this designated land use at Warm Lake. Warm Lake Road is the most direct access from Highway 55 to the Warm Lake tourist hub. Does increased industrial activity along this transportation corridor negatively impact, or discourage development that aligns with the Comprehensive Plan’s goals for Warm Lake? Are strategies needed to mitigate for 20+ years of activity that is incompatible with this land use designation? The application does not address this conflict in any meaningful way. More generally the Warm Lake Road is an important year round access point to U.S. Forest Service and private lands in the eastern portion of the county. The application fails to address how proposed activities will impact this access, and therefore must be denied.

CONCLUSION

As a matter of great public interest and scrutiny, the Planning and Zoning Commission, Planning and Zoning staff, and Valley County Board of Commissioners must ensure that Idaho laws, regulations, procedures, and required disclosures are adhered to as with any other land use and planning proceeding.

The SGLF is one component of the larger proposed Stibnite Gold Project. The proposed Stibnite Gold Project is not permitted or approved by any regulatory or governing agency at this point in time. Any timeline for conclusion of the NEPA process as well as other parallel permitting processes--including the Endangered Species Act, Clean Water Act 404 permitting, and Administrative Order of Consent-- is speculative and dependent on many factors outside of MGII’s control. The ultimate scope and shape of the Stibnite Gold Project

⁹ Comp. Plan at 73.

is yet to be determined and cannot be ascertained until a Final Record of Decision is issued by the U.S. Forest Service. Even then, required compensatory mitigation, other required reclamation, and post closure site management could make the Stibnite Gold Project infeasible for investment (See Appendix attached below).

There are a significant number of flaws, and incomplete and misleading sections in the CUP application for the SGLF. These flaws and omissions result in a deficient analysis and description of how this project will adversely impact the resources and communities in Valley County. Simply stated there is too little credible, substantiated information for a governing body to make an informed decision. SSFS, therefore, asks this Commission to deny the application in its entirety.

Sincerely,



Fred Coriell--For the Board of Directors of Save the South Fork Salmon

Appendix

I. National Environmental Policy Act and Other Considerations

The Stibnite Gold Project (SGP) is a large scale industrial mining operation being proposed within the boundaries of Valley County. Well over half of the mining project's proposed footprint encompasses public lands held by the U.S. Forest Service. This fact, along with the anticipated environmental disturbance and irreversible commitment of resources, makes the SGP a major Federal action under NEPA, 42 U.S.C. §§ 4321 *et seq.* Accordingly, its potential direct, indirect, and cumulative socioeconomic and environmental effects have triggered assessment via an Environmental Impact Statement (EIS) pursuant to NEPA. This effects analysis, required by Federal law, "does not impose substantive duties mandating particular results, but simply prescribes the necessary process for preventing uninformed - rather than unwise - agency action." *Robertson v. Methow Valley Citizens*, 490 U.S. 332, 333 (1989). It further "ensure[s] that agencies will take a 'hard look' at environmental consequences and...guarantee[s] *broad public dissemination of relevant information.*" *Id.* at 333 (emphasis added).

The Planning and Zoning Commission must be mindful that interfering in this process, whether willingly or not, will create avenues for legal challenge to the SGP NEPA. It would be prudent to integrate the County's conditional use permitting process with the larger SGP NEPA process, therefore mitigating a post hoc rationalization where the foundation is poured before the lumber is harvested, and so the forest must be cut down in order to make

use of the foundation. The Planning and Zoning Commission must also be aware of the agreement between Valley County, other cooperating agencies, and the U.S. Forest Service in the SGP NEPA process.¹⁰ As discussed above, there are issues with this CUP application that require critical evaluation for compliance with the Valley County Comprehensive Plan and potential risks to the health and well-being of Valley County residents and visitors.

A. Prejudicing the NEPA process is a violation of federal law.

CUP 20-12 is intimately connected to the proposed SGP. It is in no way a separate or stand alone action. Without approval by the U.S. Forest Service--and many other Federal and State agencies for that matter--the SGP, as proposed, will not come to fruition. Without the SGP, the SGLF is arbitrary and unnecessary. Three important components of the Council on Environmental Quality's NEPA regulations are: 1) project segmentation, which bars independent analysis of "interdependent parts of a larger action [that] depend on the larger action for their justification;" 2) "prejudicing the ultimate decision on a program;" and 3) "better integrat[ion of] environmental impact statements into State and local planning processes . . ." See 40 C.F.R § 1508.25(a)(1), § 1506.1(c)(3), and § 1506.2 (d), respectively. Together these regulations imply that local agencies and governments be involved in the NEPA process to better facilitate the decision making process without abdicating their authority by undermining the legally required analysis of a major Federal action.

Currently, the NEPA process for the SGP is ongoing. Other separate, but parallel permitting and approval processes including Endangered Species Act consultations, Clean Water Act 404 permitting, and negotiation of an Administrative Order of Consent from the Environmental Protection Agency are ongoing as well. The timeline for conclusion of these and many other permitting processes is unknown and based on factors that bear little weight on the processes themselves.

Through the NEPA process, alternatives to the SGP have been developed and will continue to be refined. The U.S. Forest Service, as the lead agency, has not yet released its draft EIS, which will outline these alternatives and the consequences thereof. This will trigger an important and required round of public analysis that must be considered before issuing a final EIS and subsequent Record of Decision. Hence, there is no guarantee that the SGP, as proposed, will 1) bear resemblance to the current publicly available information outlining the project; 2) be economically feasible due to compensatory mitigation and reclamation requirements; and 3) attract the appropriate investments to undertake the project. In short, it is premature and improvident to **assume** that the SGP will go forward as planned.

¹⁰ See FS Agreement No. 2017-0412-Stibnite Gold-MU-02a

The information contained within this CUP application is highly speculative and based upon several substantial decision making processes which are far from completion. Until a more accurate scope of the SGP is known, which will not be until at least a draft Record of Decision is issued by the U.S. Forest Service, the Planning and Zoning Commission should table this decision. After such time that a final Record of Decision is issued, when the actual scope and shape of the SGP is known, it will be appropriate to deliberate a CUP application for the SGLF.

B. Applicant Mischaracterizes Itself and Its Proposed Projects Impacts

The lack of certainty concerning the scope of the SGP ought to give pause to considering an approval for a conditional use of a property that may never be needed. Not only should an ongoing permitting process that is far from conclusion be relevant to this decision, but also the plain fact that the company applying for this permit lacks the capital to complete the proposed undertaking. Midas Gold Corp., the parent company of Idaho Gold Resources, LLC and Midas Gold Idaho, Inc., has a market capitalization, when including all of its fully diluted shares, of less than \$100 million on the Toronto Stock Exchange.¹¹ The most recent investor brochure from Midas Gold Corp. estimates that nearly \$970 million is needed to undertake the Stibnite Gold Project.

Perhaps this lack of capital is best articulated by the lack of detailed analysis provided in the CUP application. To be fair, there are two reports referenced in the entire application. The Traffic Impact Study, which is attached as Appendix B to the CUP application, and the Highlands Economic Impact Analysis, which is cited in the Impact Report at Section 2.1.2: Housing Affordability. Impact Report at 2-2. This economic assessment is inadequate and misleading for several reasons. First, it does not describe the local economies in any relevant detail from which to draw a side by side comparison of the costs and benefits that could be related to the SGP. Second, it makes very clear in the report's Executive Summary that, "the scope of this study is not a comprehensive socio economic impact analysis." And lastly, the authors of the study admit, "we did not evaluate potential economic impacts due to possible effects of the SGP on other economic activities, such as the recreation or tourism industry."

Under Traffic 2.1.1 of the Impact Report, the applicant admits it is still working with the Idaho Department of Transportation to develop a plan. Impact Report at 2-1. Moreover, the bracketed "need a conclusion" statement at the end of this section displays the lack of attention and completion of a critically important aspect of this impact report. *See id.* t 2-2. These gross omissions cast doubt on the adequacy of this application. Assumptions made by the applicant must be critically evaluated, and not rubber stamped.

¹¹ <https://finance.yahoo.com/quote/MDRPF/> (last visited July 3, 2020).

RECEIVED

JUL 06 2020

Dear Valley County Commissioners,

I am writing to express my opposition to the application for a Conditional Use Permit 20-12 for the Stibnite Gold Logistics Facility.

The Valley County Comprehensive Plan states an intention to retain the rural character enjoyed by residents and visitors. The proposed Stibnite Gold Logistics Facility directly conflicts with this goal. Warm Lake Road is an important backcountry access route, currently with limited industrial traffic. Approval of CUP 20-12 would establish an 8.5mile heavy industrial zone along Warm Lake road. If approved it will set precedent for future industrial development which may include heavy truck traffic associated with the SGP. Allowing industrial development on Warm Lake Road is a significant, irreversible, and adverse change, and is the first step in the devolution of the rural environment and the evolution of an industrial corridor.

Furthermore, the application fails to address the applicant's responsibilities for generating, storing, and disposing of hazardous wastes produced at the SGLF. Hazardous materials include sodium cyanide, potassium amyl xanthate, ammonia nitrate, and pentaerythritol tetranitrate. Under the Emergency Planning and Community Right-to-Know Act (EPCRA) enacted by Congress in 1986, the general public has a right to know about chemical hazards within their community. The CUP application must include a provision that requires information concerning hazardous material and wastes generated, stored, and transported to and from the SGLF be disclosed and made readily available to the public. Chapter 3, Goal I, Objective 5: "Protect each citizen in the community from unsafe and unhealthy conditions caused or worsened by activities, uses...or other factors located on someone else's privately owned property." The onus is on Midas to fulfill these requirements regardless of the time and investment required. The onus is on the county to insist on these requirements being met. Please do so.

Respectfully,
Amy Rush
127 Kens Place
McCall, ID 83638

From: Nora Flucke <noraflucke@gmail.com>
Sent: Monday, July 6, 2020 9:45 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Valley County Comprehensive Review

Dear Ms. Herrick,

I am writing with my deepest concern for the natural resources in Valley County, where I come to vacation every year. I come for it's unspoiled nature, which now appears to be in jeopardy given the proposed Midas Gold construction site. If the purpose of the Comprehensive Plan is to prevent uses of land harmful to the community in general, I wish to invite more consideration of the broader future with mining and tourism in the balance. Most boom-and-bust mining town in the West have not fared well in the long run. The extraction companies reap the profits while leaving toxic sites in their wake. The Comprehensive Plan lists admirable goals in Goal I - III. These are, however, incompatible with a gold mine as it is proposed.

Speaking from the perspective of what happened in my community, we are now living with a Federal Super Fund site and a hit to the tourist economy, after our Gold King mine was not longer profitable. Mining for gold in aBonita Peak has left a mine shaft that has become an unnatural aquifer. This aquifer now spills mine washout into the drinking water of communities below. Since snow melt continually replenishes the aquifer, this is predicted to continue for decades to come. Because of the dreaded impact on the tourist economy, some residents were oppose to even applying for cleanup help through a federal super fund designation. This has divided our community as we are left to deal with the degradation that the mining company has left us with.

Do not let this happen to Valley County that attracts kayakers like me, my family, and my friends to the clean waters of Idaho. Please keep in mind that, most likely, a tourist based economy is the future not a labile (and utter temporarily) venture into a commodity like gold, the price of which is always left for others to pay.
Thank you very much for listening!

Best,

Dr. Nora Flucke
Durango, Colorado 81301

From: jared <juljar@frontiernet.net>
Sent: Tuesday, July 7, 2020 10:56 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Cc: savethesouthfork@gmail.com <savethesouthfork@gmail.com>; Thomas Welty <thomaswelty@gmail.com>
Subject: Conditional use permit request 20-12 from Midas Gold

Dear Planning and Zoning Commissioners,

I am writing to share my concerns about Midas Gold Idaho's application for a conditional use permit (C.U.P. 20-12). First of all, I am an Idaho native, living in Idaho for over 47 years. Multiple times a year during summer and winter, I travel up and over Warm Lake Road. I use this road for backcountry access and to take my family camping to one of the many campsites along the way. It is one of the most scenic drives anyone can imagine. From the start of the road, looking across the plains at the open space and natural surroundings to cresting the top of Big Creek Summit and looking out at Landmark it is truly an amazing sight. So, that leads me to my concern. Are the commissioners going to let all this beauty be turned into an industrial mess? After reading the Valley County Comprehensive Plan, I was glad to see that it has a goal to maintain the "rural/small town character enjoyed by residents and visitors," but the very nature of the Stibnite Gold Logistics Facility (SGLF) goes against Valley County's vision as stated in the Comprehensive Plan. And for what? So a Canadian company can reap the profits and then leave us irreversible industrial development? (I understand that the V.C. Comprehensive plan states to "encourage mining if it meets environmental standards and complies with water quality goals" but it is premature to approve a facility in which there has not been a release of the draft environmental impact statement for the proposed Midas Gold Project, yet. It will be very difficult for Midas Gold to meet and exceed environmental standards and meet water quality goals. Don't put the cart before the horse.)

Another concern is SAFETY. No matter what Midas Gold says about what they will do to make this road safer, they cannot predict Mother Nature's force of hand during the winter months. At times this road can be heroic, not to mention if there were to be huge amounts of large trucks making the journey. This scenic drive will no longer be scenic or safe. There are many more flaws with this proposal. If the members of Valley County Planning and Zoning truly care about this valley and the beauty around Cascade, I highly recommend not signing on to Midas Gold Idaho, Inc.'s infrastructure plan and PLEASE turn down C.U.P. 20-12.

Regards,

Jared Alexander
McCall

From: Marylou Rush <mlourush@gmail.com>
Sent: Tuesday, July 7, 2020 3:30 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Conditional Use Permit 20-12

Dear Commissioners;

I am writing to express my concerns regarding the application by Midas Gold for a conditional use permit. One of Valley County's stated goals is to retain the rural/small town character for residents and visitors alike. This proposed use would not promote this goal as Warm Lake Road is a prime example of rural Valley County with farms, ranches, open spaces, and forested land. The approval of CUP20-12 would create an industrial zone along this road.

The application also circumvents the requirement for affordable housing, fails to address the applicant's responsibility for dealing with hazardous waste and potential particulate emissions. It does not address the noise levels that will be generated, nor the impacts of a 26 acre parking lot on surface/groundwater, Big Creek, and wildlife habitat.

This application is vague, incomplete, and misleading. Conditional Use Permit 20-12 should be denied.

Thank you.

MaryLou Rush

176 Maki Lane
McCall, Idaho

From: Marilyn Olson <mjolson71@hotmail.com>
Sent: Tuesday, July 7, 2020 3:49 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Valley County Conditional Use Permit 20-12 Stibnite Gold Logistics Facility

To Whom It May Concern:

The application for the Conditional Use Permit 20-12 for Stibnite Gold Logistics Facility is incomplete and misleading and should be denied.

The Valley County Comprehensive Plan has a stated goal to retain the rural character of Warm Lake Road. This proposal would adversely affect that goal. Warm Lake Road is important as an access route to the backcountry and currently has limited industrial traffic. This proposal would negate that.

Also, this application does not address the applicant's responsibilities for generating, storing, and disposing of hazardous wastes produced at this Facility.

A question I have, is where all the grey water produced at this Facility will be disposed. The public needs more information on the viability of the disposal plans and if Cascade has the capacity to accept this waste.

The degradation of 3 wetlands needs to be mitigated. Problems that could ensue would be the alteration of natural stream flow and pollution to the aquatic habitats. These issues need to be addressed.

I feel there are many questions concerning this CUP 20-12 by Stibnite Gold. Please deny this application.

Thank you for your time and consideration.

Marilyn Olson
P.O. Box 455
Timber Ridge Court
McCall, Idaho, 83638

From: john lewinski <chukarhunter1@yahoo.com>
Sent: Tuesday, July 7, 2020 4:34 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Conditional Use Permit 20-12

Box 596
McCall, Idaho 83638
July 7, 2020

To Cynda Herrick:

I would like to make two comments concerning the Stibnite Gold Logistics Facility:

1) The Valley County Comprehensive Plan has a stated goal of retaining our rural and small town character that the residents and tourists both enjoy. This Permit would create a long industrial corridor that would be against the very goal of our count's plan and should be denied on that basis alone.

2) The housing situation is already a major problem in our county. It is almost impossible to find affordable housing for the many service workers who live in our county. The workers that will be temporarily employed at this industrial zone could only make matters worse. Our tourist economy is long term. This project as advertised is not. The short term temporary jobs that this project provides will greatly harm the viability of the more permanent tourism related jobs that should always be here.

Please stop this horrible project before it proceeds any further.

Thank you,

John Lewinski

From: Galen Shaver <shaver.anderson@gmail.com>
Sent: Wednesday, July 8, 2020 8:14 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: comments on CUP

July 6, 2020

To Valley County Pand Z
Re: Conditional use permit 20-12 Stibnite Gold Logistics Facility.

Dear Cynda and Pand Z Members,

I am writing to voice my opposition to the CUP for this Stibnite Gold Facility. I do not understand why this is coming before the Pand Z at this time . This facility is directly connected to the mine proposal and would have no life without that mine. The Mine is still in the NEPA process and the Draft Environmental Impact Statement is not even due out until August. Then there are more steps before the Record of Decision comes out determining if and how the mine will go forward. At this time nobody has permitted this mine yet, so why are we even talking about this CUP?

If the application process is meant to give some kind of legitimacy to an as yet unrealized entity I think you could say this CUP application is designed to put undue pressure on the NEPA process which is wrong and something that Valley County should not be involved in. At the very least it is jumping the gun before we even know the Valley –wide impacts of the whole project which I think are necessary to consider for any approval of a CUP.

I also feel the application is not complete and leaves out crucial details like especially about hazardous materials and how they are to be handled and how we as the public are to be protected. The application says that dangerous chemicals will be “produced “and stored on site and this is scary to me and I know there is an Emergency Planning and Community right –to -know act passed by Congress to protect the public from not understanding the risks of hazardous materials in their area, but I do not think the CUP is thorough in abiding by that precautionary law. I am worried about fire and explosions.

Also I cannot reconcile the idea of the Warm Lake road which to me is a lovely rural route to hot springs and campsites and the South Fork and Yellow Pine with the idea of a 25 acre industrial complex with trucks and busses going in and out at all hours , dust and lighting and noise and a huge parking lot. How does this fit with the surrounding countryside and the comprehensive plan.?

Lastly I do not believe the application makes any attempt at mitigating the costs to Valley county taxpayers of all the impacts of this project which we won’t even know until the DEIS comes out. And you cannot separate this facility from the entirety of the project...that is a common developers trick that I think we are too experienced to fall for, at least I hope we are.

To conclude I hope you will deny the application and I do think it looks very bad to the public to have J. Defoort involved in any of the deliberations or decisions on this issue given her history and employment with Midas Gold.

Thank You and Be Brave,

Judy Anderson

Lake Fork

RE: Valley County Conditional Use Permit (CUP) 20-12 Stibnite Gold Logistics Facility (SGLF)
July 8 2020

Thank you for the opportunity to comment on the above application.

I have lived in Valley County for close to 30 years. My family, friends, and I regularly use the Warm Lake road to access Forest Service land for hiking, biking, fishing, hunting, wilderness access, boating, skiing, birding, visiting hot springs, and camping. I worked professionally for the Payette and Boise National Forests 1993-2015 as Fish Biologist and District Ranger (now retired), travelling the Warm Lake Road frequently for official purposes, including those involved with mining at Stibnite. The affected area (without approval of the SGLF) is familiar to me and of high value to my profession and lifestyle. The SGLF would significantly, irreversibly, and adversely affect not only my values, but also the environment, and public safety, for the following reasons.

1. The application should be denied because there is no current need for the SGLF. The SGLF is linked to the Stibnite Gold Project (SGP), a largescale, intensive, expensive, extractive, and complex mining proposal that has not yet been approved or permitted. There is no assurance that the SGP will be feasible. Approval of the CUP at this point would bias many processes that are currently in the works for the SGP, for example: the Draft Environmental Impact Statement, Burntlog Road proposal, Endangered Species Act consultation, Clean Water Act 404 permit, and Administrative Order of Consent.
2. The application should be denied because it conflicts with the Valley County Comprehensive Plan (VCCP) for the Warm Lake Road. Stated goals of the Plan include "retaining the rural small town nature enjoyed by visitors and residents". Approval of the SGLF would convert the Warm Lake Road into an industrial corridor, which would be a significant adverse change not only to the current condition, but to the intent of the VCCP.
3. The CUP does not address the consequences of changing the rural area into a heavy-use industrial corridor in terms of hazardous materials to be stored at and transported to and from the SGLF (sodium cyanide, potassium amylxanthate, ammonia nitrate, and pentaerythritol tetranitrate). The CUP application needs to disclose hazards, public safety, mitigation and responsibility for hazardous material, chemical, and wastes generated, stored, and transported to and from the SGLF. Until this is addressed no further action should be taken by the Commission towards CUP approval.
4. To avoid any appearance of conflict of interest by the Planning and Zoning Commission on this application, Ms. Johanna Defoort, employee of Midas Gold Idaho Inc, needs to recuse herself from any discussion of, or vote on, this application. The Planning and Zoning Commission should stop any action on this application until the issue of conflict is resolved.

Respectfully submitted,

Mary Petterson
McCall

From: Kristin Bierle <kristinbierle@gmail.com>
Sent: Tuesday, July 7, 2020 5:15 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Midas Gold Idaho, Inc. Conditional Use Permit (CUP 20-12) Comment

Planning and Zoning,

It is my understanding that Midas Gold Inc has proposed a 25 acre logistics facility on Warm Lake Road. As a resident of Cascade and Valley County I do not support their CUP. I read their application, and have a number of objections due to the vague and broad implications of the proposal, but will limit it to three points that are major concerns for our small town.

1. Hazardous Materials. This is a really big deal. What is the plan for generating, storing, and disposing of hazardous waste produced at the SGLF? The plan lists sodium cyanide, potassium amyl xanthate, ammonia nitrate, and pentaerythritol tetranitrate. The public has a legal right to know about the chemical hazards within their community. Our very own Comprehensive Plan lists in Chapter 3, Goal I, Objective 5: protect each citizen in the community from unsafe and unhealthy conditions caused or worsened by activities, uses...or other factors located on someone else's privately owned property. The Midas proposal is not in line with what the community created as a plan for our area.

2. Wastewater. The application notes that all greywater will be trucked offsite, but doesn't say where it will go. We know our treatment system does not have the capacity for this. Where is all their wastewater going and who bears the expense?

3. Larger Impact. The noise impact, road impact, transportation impact, groundwater impact on Big Creek, and visual impact are significant. In the current draft, the Midas Gold CUP application does not address the very real, intangible costs the residents will have to live with.

The CUP application should not be approved in its current form. We've asked for better communication, planning, and thoughtfulness from The River District. This proposal is much bigger, with the potential for serious long term negative consequences to the safety and well being of the residents.

Thank you,
Kristin Bierle

Cascade, Idaho

RECEIVED
JUL 08 2026

Dear P&Z Commissioners:

I am writing to comment on the CUP 20-12 application by Midas Gold Idaho, Inc. for construction of a logistics facility for the proposed Stibnite Gold Project. I hope your consideration of this application will be thorough and not subject to pressure by the applicant to expedite the process (which will be relentless no doubt). This is a clear case of putting the cart before the horse. Midas of course seeks to parallel process all of the permits related to their proposed mine even though they should be treated sequentially. The downside of this approach is that much of the information in this application is provisional and will not be certain until a final Record of Decision is made for the Stibnite Gold Project (SGP) Environmental Impact Statement by the Forest Service. There seems to be a dubious assumption among many Valley County citizens that the SGP is a done deal and the NEPA analysis a mere formality. Midas likes to encourage that assumption for obvious reasons, however the public hasn't even seen a draft EIS yet. The logistics facility is not a stand alone project, it is dependent upon the SGP going forward according to Midas' proposed plan of operations. Although the county doesn't necessarily have to treat this application as a "connected action" like the Forest Service does, you would do well to recognize that although it may appear sufficient, there are many details lacking, and there is a high degree of speculation underpinning it. Due to the above considerations I would recommend that the county table the application until more reliable information about the scope and nature of the overall SGP is available.

Following are a few questions and inadequacies that I've noted with the current application.

Protection of water quality is poorly addressed, as there are a number of potential sources of pollution associated with this facility. Existing surface water and groundwater quality is not addressed at all (#6 in Impact Report form not answered in 2.1.6 of Brown & Caldwell document). So where is any baseline water quality data? It is proposed to route stormwater to wetlands. This is probably not a good idea, considering the large area of parking lots adjacent to wetlands which would contribute hydrocarbons and heavy metals from vehicle leaks (not to mention increased temperature) to runoff. There is no mention of whether Midas has obtained the appropriate stormwater management permits and other relevant IDPES permits from the State DEQ. If stormwater is infiltrated it will move via shallow alluvial groundwater flow to eventually discharge in Big Creek. Are there plans to remove contaminants prior to infiltrating? If not, would contaminant transport be attenuated sufficiently to prevent exceedance of water quality standards offsite? Are there any relevant groundwater standards that need to be monitored? What happens to runoff in the spring when soil saturation results in overland flow? Will it reach live water? Can it be stored until infiltration is possible? Have any perc tests been done to determine whether the proposed leach field for grey water is even possible? The prevention of water quality degradation can be complicated and this document offers little detail on how this goal would be achieved.

The wetlands themselves will obviously suffer a loss of connectivity with the surrounding landscape since they are surrounded by parking lots on three sides. This loss of connectivity may adversely affect resident and migratory wildlife species.

Hazardous material storage and handling presents another significant issue. What is the county spill response capability? What happens if the Stibnite Gold Project goes bankrupt and the logistics facility is abandoned? Will the decommissioning of this facility (and hazmat present on site) be included in the SGP project reclamation plan and bond (neither of which exists yet)? There is no mention of possible hazardous vapor emissions from fume hoods or exhaust fans associated with the assay lab and hazmat storage areas. Precautions dealing with the temporary parking of vehicles carrying hazardous materials

don't seem to be addressed. One wonders why the assay lab is not planned to be located at the mine site instead. If that were the case and temporary parking of hazmat loads headed for the mine was prohibited, there would likely be little concern regarding hazardous materials at this facility.

A lot of analysis seems to be spent on traffic. One of the main conclusions is that traffic congestion at key intersections is already identified as an existing issue (many highway intersection operations are projected to "fail" by 2022 without additional traffic associated with this facility). So MGI traffic will exacerbate the existing problem and accelerate the need to address it. Another traffic-related effect that isn't mentioned is an increase in vehicle emissions associated with the facility. Of course all this traffic study is based not merely on the construction of a logistics facility, but the construction and operation of a mine, again illustrating the connectedness of and dependency upon a much larger project that should be approved in its entirety prior to addressing its parts.

Likewise the housing and economic figures are based on an analysis of the entire mine project and are derived from a report that is so riddled with dubious assumptions that even the authors take pains to include extensive caveats as to the reliability of their predictions.

Last but not least it should be noted that to avoid an obvious conflict of interest Johanna Defoort should recuse herself from any P&Z deliberations and decisions. I would suggest that decisions regarding this application be postponed until more dependable information contained in the SGP Final EIS is available for review.

Best Regards,

John Rygh

RECEIVED

JUL 08 2020

Craig Rabe
686 Fox Ridge Rd.
McCall, ID 83638
208-315-2515
craigr@nezperce.org
7/7/2020

Cynda Herrick
Planning and Zoning Administrator
Valley County
219 N Main St.
Cascade, ID 83611

Dear Cynda Herrick:

I am a long time resident of McCall and am concerned about Conditional Use Permit 20-12 Stibnite Gold Logistics Facility (SGLF). The application is vague, incomplete, and misleading. Conditional Use Permit 20-12 should be denied and the application should be returned to the applicant.

As someone who is responsible for the welfare of employees who travel the Warm Lake road on a weekly basis, the SGLF proposal causes me concern, especially considering the increased amount of heavy truck traffic that will undoubtedly occur between the mine site and the SGLF. As you're probably aware, portions of both the South Fork and Johnson Creek road, two of the three routes used by my employees, are quite narrow with very little margin for error. The probability of my staff having an accident with a large truck or bus in one of these narrow sections of road increases significantly if CUP 20-12 is approved.

It seems to me (and others) that the proponents of CUP 20-12 are getting ahead of themselves. Why establish the SGLF if you don't already know what your travel routes are going to be, or even if you're going to be able to mine at all? In my opinion, Midas needs to get these "minor" details worked out first, then the associated infrastructure can follow.

Lastly, I see this CUP as a gateway for broader industrialization of an otherwise pastoral environment, and a detraction from natural resource use. How will the proposed activity impact visitors to the area? Are these tradeoffs that we really want to make? I am looking forward to your response.

Cynda Herrick

7/7/2020

Page 2

Sincerely,



Digitally signed by Craig Rabe
Date: 2020.07.07 16:56:02
-06'00'

Craig Rabe

From: Charles Ray <marm@frontiernet.net>
Sent: Wednesday, July 8, 2020 2:11 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Cc: marm@frontiernet.net <marm@frontiernet.net>
Subject: comments on CUP20-12 application

Comments on Conditional Use Permit 20-12 Midas Gold Logistics Facility application

Sent via e-mail July 8, 2020, to cherrick@co.valley.id.us

Please confirm receipt.

To each member of the Valley County Planning and Zoning Commission,

I am a full-time, year round resident of Valley County and a property owner. I use the Warm Lake Road to access the South Fork of the Salmon River and the East Fork of the South Fork of the Salmon River for fishing, camping, hiking, and bird watching. I enjoy the drive along Warm Lake Road.

I have read the application for a Conditional Use Permit 20-12 for the proposed Midas Gold Logistics Facility (MGLF) and all of its Appendices A,C, and D. I have read some, but not all, of Appendix B. I have read the Highlands Economics LLC study - *Economic Impact Analysis of the Stibnite Gold Project*. I have read the Valley County Comprehensive Plan and Title 9 of the Valley County Code - Land Use and Development.

I find the application for CUP 20-12 substantially incomplete, vague, misleading, or incorrect in many areas. I believe this Commission must deny the CUP for the following reasons:

The MGLF conflicts with a goal of the Valley County Comprehensive Plan - A stated goal of the Plan is to retain the rural character of lands within the County. The proposed site of the MGLF is undeniably rural in character. Construction of the MGLF would result in a complete and irretrievable loss of that rural character.

Approval of CUP 20-12 would set a damaging precedent - If the MGLF is allowed in the proposed location, it will in effect turn 8.5 miles of the Warm lake Road into an industrial development corridor. If the SGLF is approved, it will be very difficult or impossible to deny CUP's for similar or larger industrial facilities along that stretch of Warm Lake Road. Why does the MGLF have to be located here? Why not in an area of the County that already has industrial development?

The application mischaracterizes traffic congestion that would be caused by the MGLF - The application describes current traffic congestion along the Highway 55 corridor and concludes, "This congestion occurs with or without the proposed Logistics Facility development." The current level of congestion is not the issue. The issue is additional congestion caused by the MGLF. Furthermore, the claim that the MGLF will result in only an additional 20 light vehicles a day on Warm Lake Road is ridiculous on its face. Midas variously claims 500 - 600 employees at the proposed Stibnite Gold Project, accessed via Warm Lake Road. The parking area at the MGLF, an integral and inseparable part of the Stibnite Gold Project, would have 300 spaces. Only twenty more light vehicles per day on Warm Lake Road? Sorry, it just doesn't add up.

The MGLF would make housing less affordable - For years, Midas Gold has touted "500-600 high paying jobs" at the proposed Stibnite Gold Project, of which the SGLF is an integral and inseparable part. Taking Midas at its word — With 500-600 highly paid workers suddenly injected into the local housing market, the claim in the application that the project will have "an indirect positive impact on housing affordability" is ridiculous on its face. Valley County Code requires mitigation of impacts on housing

affordability. The applicant cannot sidestep this requirement by simply making the incredible claim that the project will have a "positive impact".

The application mischaracterizes and attempts to minimize the risk of fire, explosion, and other hazards - This is a clear threat to public safety, and this serious deficiency in the application alone is ample reason to deny the CUP. The application states, "The Logistics Facility may store small quantities of various hazardous materials and chemicals during construction and operation." It also states, "The hazardous materials storage building will be used to store hazardous materials that are generated the Logistics Facility prior to being shipped out for disposal.....". The application contains virtually no hard information about these hazardous materials. What exactly are the hazardous materials and chemicals? What exactly is a "small quantity" ? Does this mean that shipments of many tons of hazardous materials and chemicals such as sodium cyanide or ammonium nitrate destined for the proposed Stibnite Gold Project will never be stored or held over at the MGLF? What happens if the proposed Burnt Log access road to the Stibnite Gold Project is closed by winter weather and a shipment of tons of sodium cyanide is in route on the Warm Lake Road? Will that potentially deadly chemical be stored at the MGLF?

Two other issues - I see on Midas Gold Idaho's website that Ms. Johanna Defoort is employed by Midas Gold Idaho. To prevent any appearance of a conflict of interest and to avoid tainting any action by the P & Z Commission on CUP 20-12, I suggest that Ms. Defoort declare her conflict of interest, abstain from any discussion of the application, and recuse herself from any vote on the application.

I also request that all members of the P & Z Commission and the Commission staff declare all *ex parte* communication with any employee, any representative, or any attorney representing Midas Gold or any of its subsidiaries or contractors. I request that Commission members and staff refrain from any *ex parte* discussion from the comment deadline on the CUP application until the time of a vote (if any) on the CUP.

In conclusion - Due to the conflicts with the Comprehensive Plan, deficiencies, mischaracterizations, unfounded assertions, and conclusions not supported by fact in CUP application 20-12, I urge the Commission to deny the application.

Thanks for the opportunity to comment. I look forward to one or more public hearings.

Charles Ray
McCall, ID

marm@frontiernet.net

From: Tor Andersen <torandersen1000@yahoo.com>
Sent: Wednesday, July 8, 2020 1:46 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: CUP 20-12 Comments

July 8th, 2020

To The Valley County Planning and Zoning Commissioners,

I believe the application for the Conditional Use Permit, (CUP 20-12), from Midas Gold Idaho, Inc. for a logistics facility along Warm Lake Road should be denied. My first concern is that the Stibnite project has yet to receive permitting and approval. This will be a large-scale industrial facility set in an otherwise pastoral and rural landscape. If this CUP is approved now and the "Logistics Facility" construction moves forward, what will happen if the Stibnite Gold Project is denied permitting, deemed financial unfeasible, or the scope and scale of the project drastically altered? To me this appears to be "placing the cart well ahead of the horse"; even the draft Environmental Impact Statement for the Stibnite Gold Project has yet to be released.

At this stage, there is a real possibility that this facility could sit unused to its full potential, or unused and empty, then sold to another big industrial company. It concerns me that you approving this permit could set a precedent, that more industrial use be permitted between the proposed Stibnite Gold Logistics Facility and the existing Granite Excavation site, turning this section of Warm Lake Road into an industrial corridor.

This beautiful section of road epitomizes rural Idaho. It is the gateway for many tourists and locals alike, to the Idaho Back Country. In the Valley County Comprehensive Plan, Goal IV of Chapter 6 is "To identify, protect and maintain scenic byways and drives within Valley County". Warm Lake Road is beyond doubt, worthy of protection.

Why jeopardize this portion of Valley County for a project, who's larger project, is under much scrutiny and has yet to be approved? Please consider the ramifications of approving this project, and consider that to approve it now is premature and unnecessary. Please vote to deny CUP 20-12.

Lastly, Commissioner Johanna Defoort, Project Accountant for Midas Gold Idaho, should recuse her self from this case, as it is a clear conflict of interest.

Thanks, Tor Andersen

Valley County, ID

From: John Bengtson <jdbengts@gmail.com>
Sent: Wednesday, July 8, 2020 4:39 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Comments on Proposed Logistics Facility on Warm Lake

Dear Cynda,

Thank you for taking the time to read my message. I wish to pass along a brief word in opposition of the proposed logistics facility on Warm Lake Road.

I chose to move to Valley County four years ago because of its scenic character and pristine natural landscape. Quiet solitude and fresh air weave the fabric of this community, no matter how we choose to enjoy it.

The slapdash proposal by Midas Gold betrays an utter disregard for these values. Not only would the proposed 25 acre parking lot inexorably alter the character of the Big Creek Summit area, the company has failed to adequately reckon with the consequences of their action. How will the town handle the increase in wastewater from this chemical facility? What will the influx of outsiders do to the already tenuous housing situation in our town? Midas Gold has failed to answer these questions, and seems uninterested in finding answers.

I urge you to reject this hasty proposal so that we might maintain our mountain sanctuary as it is; as it ought to be.

John Bengtson

From: Julia Welch <jwelch1@antioch.edu>
Sent: Wednesday, July 8, 2020 5:30 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Conditional Use Permit Comment

Dear Ms. Herrick,

I am writing to submit my comment regarding the Midas Gold Conditional Use Permit, especially as it pertains to the impact of wetland areas.

While the application states that there will be no impacts to wetland areas, other statements throughout the report contradict this. As noted in the report, the three wetlands in the proposed areas of development would be surrounded by impervious surfaces, particularly parking lots. This is incredibly concerning to me for a variety of reasons.

As a conservation biologist by profession, I could write hundreds of pages about the ecological importance of wetlands and the incredible array of ecosystem services they provide overall. In addition to water filtration, groundwater storage, and natural protection from effects of erosion, these sensitive and vital ecosystems are a diverse and abundant source of wildlife, including species of management interest and special concern.

It is my professional opinion that the authorization of this permit would contribute to the destruction of wetlands so essential to our overall landscape.

I am requesting that you do NOT grant this permit.

Sincerely,

Julia Welch

Julia Welch,
M.S., Conservation Biology, 2016

Antioch University New England

(cell) 315-567-1470

From: Zak Sears <zaksears4@gmail.com>

Sent: Thursday, July 9, 2020 7:41 AM

To: Cynda Herrick <cherrick@co.valley.id.us>; savethesouthfork@gmail.com <savethesouthfork@gmail.com>

Subject: I oppose CUP 20-12

To Whom it May Concern,

I am a resident of McCall in Valley county and I oppose the application Midas Gold has submitted for the Conditional Use Permit to construct a Stibnite Gold Logistics Facility. The application is vague, incomplete, and misleading. Conditional Use Permit 20-12 should be denied and the application should be returned to the applicant.

I use the Warm Lake Rd frequently to access the greater South Fork of the Salmon area to seek refuge away from bustling infrastructure that so consumes much of Long Valley. I will not stand by and watch as a corporate giant attempts to take advantage of my small community. The establishment of this facility will set a precedent for future development in the area that is free of evaluation and community involvement. The heavy truck traffic associated with this facility is deeply concerning as well. The roads in the area are narrow and difficult to navigate even in a smaller vehicle. Last week a commercial truck drove into the nearby North Fork of the Payette river, closing the highway for hours, and polluting the river with all of the trucks contents. This outcome is a certainty if the described traffic in this proposal occurs.

Moreover, this proposal directly disregards the Objectives of Goal 1 on page 11 of the Valley County Comprehensive Plan which are to:

1. Maintain or improve existing levels of service as new growth occurs;
2. Evaluate the likely impact on the costs of services for new growth to ensure it does not create and undue hardship for Valley County residents.

Midas Gold is directly ignoring what the community of McCall has outlined to be in the best interest of its people and lands.

Zak Sears

From: Will Stubblefield <willstubb@gmail.com>
Sent: Thursday, July 9, 2020 7:53 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Midas Gold Conditional Use Permit (CUP 20-12)

Hello Cynda Herrick,

I'm writing to express my concern about the proposed Stibnite Gold Logistics Facility (SGLF) along the Warm Lake Road outside of Cascade. I believe this construction project would have irreversible impacts to the rural character of Valley County, which is stated as a goal in the Valley County Comprehensive Plan. Further, Midas Gold's proposal states that there will be no impacts to local wetlands, which is inaccurate.

I'm currently a resident of Teton County in Idaho, but have spent time from 2014-2016 as a resident of Valley County. I was a graduate student at the McCall Outdoor Science School and worked at the McCall-Donnelley High School as a classroom aide. My time as a resident of Valley county has given me strong ties to the community and I currently frequent Valley County to recreate, visit friends, and support the local economy.

I love the rural character of Valley County and believe this aspect is at the heart of the community and should be preserved. Like many other Idahoans, I spend time driving along the Warm Lake Road to access the South Fork of the Salmon Watershed. This place has an intrinsic value as a beautiful and natural environment and would be permanently altered by the proposed SGLF. Economically, the rural character of the Warm Lake Road brings people from across our state and our nation to communities like Cascade, Donnelley, and McCall. These campers, hunters, fisherpeople, off-road enthusiasts, hikers, and boaters choose to spend their time and dollars in Valley County because of this rural character and the access to Public Lands. This is a vibrant and sustainable economy that benefits our community and the proposed SGLF would diminish the experience that these individuals are seeking when travelling to Valley County.

Midas Gold's CUP at Impact Report 2-4, 2-7 is inaccurate and misleading when reporting that there will be no impacts to local wetlands. This reporting disguises the project as benign to the local environment and neglects to fully disclose the negative impacts to surface water, wetlands, and riparian areas. Again, the impact of the proposed SGLF will not only damage the local environment but will leave lasting damage to a resource that is critical and connected to the people of Valley County. The SGLF will include large areas of impervious surfaces including a 300 car parking lot. Impervious surfaces like this are known to cause increased speed and volume of storm runoff delivering pollutants like sediment, chemicals, and petroleum products directly into local waterways. Although Midas Gold Reports "undisturbed wetland areas will help break up the parking areas and building sites," two of the three wetlands, which are both significantly larger than the third, will be surrounded by impervious surfaces. Fragmentation of these wetlands by large areas of impervious surfaces will have a significant impact on the health and function of these areas vital to our watershed.

The proposed SGLF will have lasting and negative impacts to the community of Valley county and I urge you to reject the Midas Gold Conditional Use Permit (CUP 20-12) to protect the interests of the people of Valley County.

Sincerely,
Will Stubblefield

From: Ruth Lewinski <ruth.lewinski@gmail.com>
Sent: Thursday, July 9, 2020 8:33 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Comment for CUP 20-12 Stibnite Gold Logistics Facility

To Whom it may concern-

I am writing to oppose the approval of the Conditional Use Permit 20-12 for the proposed Stibnite Gold Logistics Facility.

I was raised in McCall and have referred to it as home for 26 years. Currently, I am wrapping up an MSc in Environmental Science and study medicine at the University of Washington. Based on my educational experience, I do not believe that the Stibnite CUP application has adequately factored in the potential health impacts of proposed infrastructure. This could have grave safety consequences for the residents of Valley County. After reading and analyzing the report, some of my concerns include:

- Lack of an appropriate fire safety plan while installing electrical facilities. The fire maintenance plan does not include spark management for large vehicles. Large infrastructure fires are not included in section 2.1.7. Use of fire extinguishers alone, without an existing water source, presents a huge risk for the surrounding forest. Removed topsoil is proposed to be moved to wetland areas (section 2.1.8), which further increases potential fire risk. If emergency fire vehicles are called to the area, it will deny the town of Cascade these vehicles for the time it will take to drive to the Warm Lake Facility, manage the fire, and return. The same is true for an ambulance call.
- Lack of a cleanup plan installing septic facilities. A geological water map is not included for the site and contamination of groundwater may affect residential drinking sources
- Traffic analysis is focused on volume, but lacks the impact of the weight of the vehicle and how that will affect road quality. If roads are not properly maintained, accident incidence is likely to rise, especially during winter conditions. Stibnite 'safe traffic flow' is reliant on Idaho Department of Transportation improvements that are not yet in existence. In addition, the health impact analysis for an increase in traffic has not been adequately discussed
(<https://www.transportation.gov/mission/health/Health-Impact-Assessment>)

[Health Impact Assessment \(HIA\) | US Department of Transportation](#)

Health Impact Assessment (HIA) Health impact assessment (HIA) is a process used to evaluate the potential health effects of transportation policies, plans, or projects on the community and to help integrate these considerations into the decision making process.

www.transportation.gov

)

- Baseline noise studies have not been included and specific projections have not been made. Noise will impact wildlife and recreationists in the area.
- Specific management of particulate emissions is not included.
- Water facilities lack scientific investigation into water quality and quantity. Ground water analysis has not been conducted in the area to show geographical availability of water, nor has a projected volume use for the facility been disclosed. Safe surface water drainage has not been investigated and flows will include hazardous debris.

- Storage of hazardous materials lacks specific infrastructure description; without a building plan included, standards may only meet minimal national requirements, presenting a contamination risk to soil and water in the surrounding area.

- Current emergency and healthcare facilities have limited resources to provide coverage for this area and no mass-casualty plan is discussed.

While my field experience is limited, over the last year, I have worked with a research group to analyze the health impact assessments of large infrastructure projects in Sub-Saharan Africa. This CUP is vague and unspecified infrastructure plans leave large risk potential and thus may harm current residents. This document is worse than many proposals I reviewed for projects in Africa, which is disappointing, as I believe that Idaho should have high standards for developing infrastructure. In its current form, the CUP does not support the safety and health of current residents in Valley County. Please consider their wellbeing as you make permitting decisions.

I hope to raise my children in forests with the same environmental qualities that I was able to experience throughout my childhood in the area. Your decisions help make this a possibility. Strict regulations for future development help preserve our communities' rural integrity.

Kind regards,

Ruth Lewinski
ruth.lewinski@gmail.com
(208) 315-3793

From: amos scott <amos2500@yahoo.com>
Sent: Thursday, July 9, 2020 8:58 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Midas Gold Project

I once worked at Stibnite with my entire family. At first I openly supported the Midas Gold project for the jobs it is expected to bring into the region. But then, I realized that the leadership of Midas Gold is very self-serving and dishonest. Especially when it comes to destroying public access to public lands.

I created a petition against Midas Gold, to address their illegally gating off of public lands.

<https://www.change.org/p/payette-national-forest-stop-midas-gold-closing-public-roads>

A group was formed to address the outright corruption of Midas Gold. Buying off elected officials for special favors, secret backroom meetings with the Forest Service and other regulatory agencies.

<https://www.facebook.com/groups/685629481838997/?ref=share>

I believe that there are enough liars and thieves in the world. Which is why Valley County doesn't have room for the type people that Midas Gold employs.

Lastly, I have fished the East Fork of the South Fork of the Salmon River my entire life. I think Midas Gold's plans to "restore" the river will do nothing to help fish. And is much more likely to utterly destroy fishing forever in that great watershed.

Scott
208.297.0634

From: Linda <lindajar@msn.com>
Sent: Thursday, July 9, 2020 9:51 AM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Stibnite Mine

Ms. Herrick:

I am deeply, passionately, profoundly opposed to the plans that Midas Gold has proposed for the South Fork.

For gold??? To further degrade a pristine and beautiful and cherished landscape/habitat for GOLD????

I'm opposed because it's wrong. Just wrong.

Linda Jarsky
1721 N 22nd St.
Boise ID 83702
208 859 3818

Valley County Planning and Zoning
219 North Main Street
PO Box 1350
Cascade, ID 83611

July 9, 2020

Planning and Zoning Administrator Herrick,

I am writing to express my deep concerns regarding the Conditional Use Permit (CUP 20-12) that has been requested by Midas Gold Idaho, Inc for the Stibnite Gold Logistics Facilities, and its proposed construction on Warm Lake Road outside of Cascade.

As a resident of Cascade, my concerns come regarding the direct impact to quality of life for my family and community. One concern is the impact on recreation. As residents inside of the Cascade City Limits, the Warm Lake Road is a major route of access to Idaho's Backcountry and Wilderness. We use this road to run and to bike. It is the access route to the Eagles Nest Trail, a recreational feature that benefits the town and draws visitors in for recreational opportunities. In the winter, we use Warm Lake road to access backcountry skiing at Big Creek Summit, and to reach established winter access from Warm Lake. If a large industrial facility is constructed, and heavy vehicle traffic is increased on Warm Lake road, we will experience a dramatic increase in our exposure to risk as we pursue our regular forms of recreation, both on bicycle and on foot. Additionally, the proximity to Horsethief Reservoir will have a detrimental impact on the experience of all visitors who come to recreate on its waters.

A second concern regards the exposure of the community to hazardous waste and materials, the associated potential for fires and explosion, and the impact to ground water in local streams and the river. An Assay Laboratory for metallurgical testing and Hazardous Materials Storage Building are two direct threats to Idaho. While the Stibnite Mines location on the East Fork South Fork Salmon River poses a threat to the Salmon River Drainage, the Stibnite Gold Logistics Facility on Warm Lake road poses a direct threat to the North Fork Payette River Drainage. Approval of this Conditional Use permit extends the area that is exposed to the impact of Chemical Gold Extraction, and could impact towns, cities, and communities that exist downstream. The proposed location along Big Creek exposes all who live downstream. The Impact Report in the Permit Application fails to address any of the potential impacts of the hazardous waste and metallurgical processing on the creeks, streams, and rivers of our area.

My final concern is regarding the visual and noise impact that will be incurred along Warm Lake road. The rural characteristics of Valley County will be compromised and lost with the construction of a massive parking lot and industrial facility, establishing a new norm and precedent for industrial development in our rural community.

Prior to approval, please deeply consider the impact that this facility will have on the quality of life for the community that is established here, and the long lasting ramifications approval could cause for the future.

Respectfully,

A handwritten signature in black ink, appearing to read 'Justin Kleberg', written in a cursive style.

Justin Kleberg
Cascade, Idaho

From: Michelle Blank <michelleblank@mac.com>
Sent: Thursday, July 9, 2020 1:00 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Comments in regards to Conditional Use Permit 20-12

Dear Valley County Planning and Zoning Commission Members,

I am writing to express my concern about Conditional Use Permit (CUP 20-12) to construct a Stibnite Gold Logistics Facility on Warm Lake Road. I am particularly concerned about the hazardous waste materials that will be stored on-site. Those materials have the potential to impact community health for generations to come. The containment of the same hazardous waste materials at the Stibnite Gold Mine are subject to an Environmental Impact Statement that requires a multi-year analysis to ensure safe storage and transport. The Conditional Use Permit does not even include what chemicals will be stored at the location on Warm Lake Road, much less does due diligence to explain to both this commission, and the general public safeguards against community and environmental exposure. This, in itself, is a red flag that should lead this commission to seek more complete information. At a minimum, this commission should obtain a complete list of all hazardous waste materials and chemicals to be stored at the Warm Lake site, wait until the Environmental Impact Statement (EIS) is released, analyze the protections required by the EIS as the mining site, and ensure those same protections are afforded at the Warm Lake site, before any Conditional Use Permit is issued. It is incumbent that the Planning and Zoning Committee do due diligence to protect local residents and environment. Thank you for your consideration.

Michelle Blank
McCall, Idaho

From: Kevin Studley <kevin@transition-lab.com>
Sent: Thursday, July 9, 2020 2:34 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Public Comment

Cynda,

Please accept my public comment regarding the Conditional Use Permit (CUP 20-12) for the Stibnite Gold Logistics Facility outside of Cascade. I would like to voice my concerns over the proposal for this project. The Warm Lake Road is a narrow corridor to access a spectacular part of Valley County. I frequent this area in the winter time as Big Creek Summit at the top of the road is nearly the only backcountry winter access for non-motorized use in the region. I, like many others, enjoy the access to the South Fork of the Salmon river for a multitude of outdoor pursuits. Of course, the delicious spring-fed water alongside the road is a vital resource to the community as well.

I feel as though the approval of the SGLF would begin an irreversible path of industrializing the Warm Lake Road. This proposal appears to contradict the goal "to retain the rural/small town character enjoyed by residents and visitors" as outlined in the Valley County Comprehensive Plan. The storage of hazardous waste materials adjacent to the Big Creek drainage is a major concern to me and it should be reevaluated.

I would urge Valley County Planning and Zoning to reconsider this proposal.

Sincerely,

Kevin Studley

From: Rachel Ackerman <rachel.l.ackerman@gmail.com>
Sent: Thursday, July 9, 2020 3:21 PM
To: Cynda Herrick <cherrick@co.valley.id.us>
Subject: Midas gold proposal comments

Good afternoon Cynda,

I am currently a teacher in and resident of Cascade, Idaho. I am writing in regards to the Midas Gold proposal for permit to construct logistics facility on Warm Lake Road.

I am against the construction of aforementioned facility because it does not align with several goals as stated in the most recent Valley County Comprehensive Plan.

The proposed project's Proximity to Horsethief Reservoir State Park not only compromises health and safety of this water body and associated wetlands but also will likely impact tourism at the site. As part of a unique, visually attractive, and environmentally necessary bird migration corridor, Cascade attracts numerous nature enthusiasts and this wetland area is critical habitat for avian species.

Additionally, Valley County Comprehensive Plan prioritized development for residential and commercial purposes that will support affordable housing and economic development for our community. The Midas Gold proposal, however, is for industrial development, which is not something we in this county have highlighted as desirable. The presence of such a complex is also likely to lower property values in the surrounding area, putting more burden on those who are less financially privileged to live in the midst of noise, air, water and visual pollution.

The proposal itself feels vague in general. For instance, the section regarding noise does not mention decibel levels. also, this section describes noise pollution likely to occur during construction but fails to address noise pollution that will continue once the facility begins operation. Recent studies on noise pollution suggest that exposure to both acute and ambient noises has negative health effects, varying in severity based on chronic exposure to even subtle sounds.

I also have to wonder where the profits from Midas Gold's endeavor will end up. They aim to provide jobs locally for construction of this facility, but what about operation? And what about when the mines dry up? What is the company going to invest in? Who are they going to pay the big bucks to? How will this benefit us, the folks who are making the real sacrifices? And how does this compare to the harm that we will enable by allowing construction to commence?

For me personally, I drive on Warm Lake Road often to access the rural beauty and natural environment that the area has to offer. This will be hindered by the construction of such a large industrial complex amid the quaint ranch lands. I left my hometown, Cleveland, because industrial pollution there caused me to develop asthma, I would hate for my current home to

cause similar adverse health effects now and in the future because of the precedent the approval of this project would set.

Boise is one of the fastest growing cities, per capital, in the United States currently. We are all well aware that many Boise residents travel to Valley County each weekend and Cascade therefore has great potential to further capitalize on the natural splendor of our wonderful community, which will be hindered if we chose to opt for industrial pursuits.

I urge you to consider my comments, in tandem with the many others I am sure you have received, and to deny the permit for construction of a Midas Gold complex in Cascade.

Thank you for your time. If there were to be an extension for comments, I would gladly provide further and more detailed, targeted information.

Warm regards,

Rachel Ackerman