

From: Laurel Sayer
To: [FS-comments-intermtn-payette](#)
Subject: Public Scoping Comment
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Attachments: [image003.png](#)
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Dear U.S. Forest Service officials:

As the President and CEO of Midas Gold Idaho I submit this letter to address instances of misinformation or misunderstandings in some comments submitted to the US Forest Service during the scoping period for the Stibnite Gold Project.

As someone who identifies as a conservationist and enjoys the beauty and recreational opportunities in Idaho, I joined Midas Gold Idaho's parent company corporate board in 2014 and then took on the role of leading Midas Gold Idaho in 2016 because I truly believe we have an opportunity to create positive, meaningful, change. I am proud of our vision that we can partner business and the environment together to make a difference in the industry, in the local community and on public lands that need help.

Throughout my career working on large projects to protect and conserve public lands, I came to appreciate the importance of transparency. Open dialogue is the foundation for progress and it requires accurate information.

The following is intended to help correct the public record and ensure an accurate foundation for the review of our Plan of Restoration and Operation.

1. Area of disturbance.

I have seen some submissions exaggerate the overall area of impact, incorrectly stating that the claim block of 29,827 acres is the total number of disturbed acres.

In reality, our plan is quite clear. In total, only 1,447 acres of public land and 544.1 acres of private land, will be disturbed. We prioritized limiting the footprint of the project to areas previously disturbed by mining activity wherever possible. Importantly, 42 percent of the project related disturbance is located on areas already impacted by historic mining activity.

Combined with the areas that will be restored, there is a net benefit to public lands. The company will restore, repair, replace and enhance more than 50,000 feet of stream channel and riparian habitat and repair Blowout Creek which will restore the water table to its former level improving functionality of wetlands. Additionally, 454 acres of wetlands will be restored and 29,540 feet of additional habitat for fish will be opened.

2. Current public investment.

I was astonished to read statements in submissions that \$13 billion taxpayer dollars have been used to reclaim the area. This is both misinformed and terribly misleading.

Publicly available sources estimate that between \$7 and \$12 million has been spent at the site to provide temporary reclamation solutions at a minimal level.

Thankfully, today, rules are in place to protect the land and the taxpayer. Most people don't realize that mining operations must fully bond for the full clean-up and site reclamation. Midas Gold Idaho is fully committed, and required by law, to make sure that we are solely responsible for cleanup and complete restoration as prescribed by a plan laid out by land management agencies and have bonding in place sufficient to ensure that cleanup and restoration occurs.

In fact, our project will take responsibility for areas that needs to be repaired today and have no public resources dedicated to them for such restoration.

3. Superfund status.

Some groups incorrectly identified our project location as a superfund site.

While the site has a host of legacy impacts, it is not a superfund site. If approved, our plan will be responsible for improving the current conditions and leaving it better than it is today.

4. Health of the environment.

The remote nature of the site means not many people have been to the project location. Every summer we offer tours for people who would like to see it firsthand.

I have traveled to site many times, and can attest that the area is not on the mend. The East Fork of the South Fork of the Salmon River flows directly into an old mining pit and will do forever. Fish cannot migrate beyond the pit because the walls are too steep. Heap leach piles remain open and exposed. Waste rock from prior mining operations is poorly placed, impinges the East Fork, and are a source of sedimentation. Tailings from former operations are a likely a significant source of metals leaching into groundwater. Wildfires and mining have led to erosion that reduce the value of the ecosystem,

degrade water quality and impact fish populations.

I am confident that, through Midas Gold's dedication to leaving the place better than they found it and the current bonding safeguards in place by federal and state agencies, this plan will be a benefit to all Idahoans and all users of public lands, ensuring these issues are appropriately addressed.

5. **Method of mining.**

The Stibnite Gold Project is not a strip mine. We propose additional surface mining of two existing open-pits and one former underground mine, plus reclaiming legacy tailings currently covered by spent heap leach ore. Further, we will completely backfill one of the open pits with development rock, allowing the rebuilding of the East Fork river channel.

6. **Processing method.**

The Stibnite Gold Project is not a heap leach operation. We propose to recover gold and antimony by flotation methods.

This river is enjoyed by not only my family and friends but many other residents of Idaho that fish, hunt, hike and paddle. Midas Gold has spent over five years engaging the local communities and residents in a Plan to "Restore the Site". We are fully committed to listening to all stakeholders and finding a path forward to benefit the people, land and economy of Idaho.

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