

Kenneth A. Brunk



July 14, 2017

Payette National Forest  
ATTN: Forest Supervisor Keith Lannom—Stibnite Gold EIS  
500 N. Mission St.  
McCall, Idaho 83638

**RE: Stibnite Gold EIS Scoping Comment**

The "Stibnite Gold Project Plan of Restoration and Operations" submitted by Midas Gold Idaho, Inc. (Midas Gold) is an exemplary project that will serve as a template for the mining industry in remediating legacy mine sites. I am currently advising Midas Gold in this project and recommend that the environmental impact statement address the environmental and economic benefits that this proposal would have to the local area, the tribes, and the taxpayers.

My whole career has been in mining, spanning 48 years and covering the functions of an on-site engineer, general manager, and eventually opening numerous mines for Newmont in Nevada and other locations, and subsequently for independents in Nevada and South Carolina and elsewhere throughout the world. Most recently I have served as CEO and board member of smaller startups and junior exploration companies. Over the years I have seen, and been part of, many, many changes in mining practice. Those changes have been focused on transforming a necessary and basic industry to one that not only supplies mankind with a high quality of life but also resulted in environmentally responsible mine sites. I am pleased to say that mining in general, but especially under existing regulations, is not the environmental disaster that it once was. Legacy mining sites are a blight on the environment, but more so on the industry. However, as this project demonstrates, the industry now has the means to address legacy issues that affect the public while still meeting the expectations of investors and shareholders.

Minerals mined at this site have included gold, silver, stibnite and antimony. Antimony was used to create bullets and was considered critical during World War II. From 1941 to 1945, the Stibnite area mined and milled tungsten and antimony, producing 40 percent of the nation's domestic supply of tungsten and 90 percent of its antimony. Stibnite contained such large quantities of antimony that individuals working at the site were considered to be in service to the country. At one point, more than 1,500 people were employed at the mine.

Currently, the United States defense, energy, and manufacturing industries are dependent on foreign antimony sources. Development of domestic antimony is in our strategic interest. The Stibnite mining district (including the historic Yellow Pine deposit in central Idaho) contains an estimated 41,000 metric tons of antimony, making it the largest domestic antimony supply.

Located in the upper East Fork of the South Fork of the Salmon River (EFSFSR) drainage, just east of the Frank Church-River of No Return Wilderness, and with the nearest populated site being the City of Cascade, the project area comprises a combination of lands within the Payette National Forest and Boise National Forest, as well as state and private lands. Much of Stibnite mine site has been remediated where impacted by historic mining and ore processing operations, but legacy mining impacts remain.

For more than a hundred years, as control passed through multiple mining companies, thousands of miners have found employment. Following decades of independent mining, mining companies focused their efforts on the Yellow Pine Pit in 1938. After World War II, operations at the site slowed and many miners left the area. Mining in the area was sporadic from the 1970s to the late 1990s, but active until 1997. When Midas Gold first acquired the site in 2009, they evaluated the costs of environmental restoration as part of their consideration of potential profits.

The plan Midas Gold has submitted begins with restoring a brownfields site. The plan will reduce incremental impact and improve existing conditions by: reusing previously impacted areas; reclaiming historically impacted areas; upgrading the existing Burntlog Road; using the existing power line corridor; reprocessing historic tailings; reusing an impacted area for waste rock; reusing existing haul roads; re-mining previously mined areas; and, using the West End waste rock to backfill Yellow Pine pit, contouring it to a more natural topography.

As a result of traditional mining methods, operations at the pit have blocked fish passage and to this day fish in the East Fork of the South Fork of the Salmon River cannot swim upstream past the site. The proposed plan will help fish migrate to the upper stretches of the river for the first time in 80 years. The intent of restoration is to use mining to rewrite the site's legacy and correct many of the legacy problems. The plan also includes a robust closure and final reclamation plan.

In developing the plan submitted, Midas Gold worked with the local communities and tribes to prepare a plan that addresses the issues most important to their future and with respect of their past. Prior to any profitable mining, Midas Gold will voluntarily invest in restoration of the legacy site, correcting the unavoidable impacts of previous mining practices. Health and safety issues are first to be addressed, and certainly the employment offered both for the initial restoration work and then the mining will bring economic positives to the area. Restoration efforts will improve water quality by cleaning up the millions of tons of waste rock and tailings that slowly leach metals and send sediment into nearby ground and surface water, and include sediment reduction measures, as well as remove and reprocess existing tailings, re-use existing spent ore material for new construction, and rehabilitate historical impacts. Midas Gold will continue with high environmental and safety standards already established as shown in their record of zero lost time incidents from 2013 to the present.

Of primary importance to the tribes is reclamation of the streams and rivers, and provisions for salmon spawning. Concurrent environmental and fisheries enhancement are presented as part of the overall mine plan. Prior mining has left a barrier to fish migration since 1938. Restoration activities will include: re-establishing fish passage in the upper watershed; rehabilitating stream channels and creating wetlands; installation of a temporary tunnel for fish passage during operations; completing upstream and downstream habitat restoration; enhancement of wetlands; and, restoration of creek for permanent fish

passage post-closure. The goals of restoration are to create a self-sustaining natural environment that will support healthy fish and wildlife population. Restoration of the salmon population will have a positive impact on recreation activities as well. Reforestation of project area has already begun with 26,500 trees planted to date and more planned.

The project is expected to generate approximately 700 direct and indirect jobs during the first three years of the construction phase, as well as 500 direct and 500 indirect jobs during the estimated 12 years of operations. These would be high paying jobs offered in the parts of Idaho with some of highest unemployment and lowest wages.

With regard to scoping issues, a balanced review will be sure to address the legacy issues described above and evaluate the resources planned for improvement. These include socioeconomics; access and transportation; long-term, post-closure site management; recreation; fisheries and wildlife; and, water resources (groundwater and surface water). The environmental impact statement can rely on the excellent work in geochemistry and hydrology that the U.S. Geological Survey has conducted over the past years. The resource areas of recreation, roadless areas, vegetation, visual quality, and wildlife will need careful analysis to address the need for amendments to the Payette and Boise Forest Plans that may be required. As the agencies review the alternatives, it is important to remember that this area will not recover on its own, meaning that the No Action alternative will not allow for the planned improvements.

I appreciate the opportunity to provide scoping comments on the Stibnite Gold Project EIS. Please include me on the mailing list for all future announcements, decisions, and project related news releases related the Stibnite Project.

Given the model this project provides to the industry, I would encourage the agency to expedite the EIS process for this project. I would also encourage all of the state and federal regulatory agencies with jurisdiction over the project to coordinate their permitting efforts, and work together under the Idaho Joint Review process so that the environmental benefits of the project may be realized in the near future.

Regards,



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