

**From:** Tom Smith  
**To:** [FS-comments-intermtn-payette](#)  
**Subject:** Stibnite Gold Project PRO  
**Date:** Friday, July 14, 2017 6:12:08 PM

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Mr. Lannom,

The Stibnite Gold Project, as submitted to the US Forest Service in Midas Gold Idaho's Plan of Restoration and Operations, is good for Idaho's people, environment and economy.

Without the Stibnite Gold Project, fish will never migrate back to historic spawning areas at the headwaters of a tributary to the Salmon River. Millions of tons of legacy spent ore, waste rock and tailings will remain a potential source of water contamination. Hundreds of tons of sediment will continue to wash into our rivers and streams. The East Fork of the South Fork of the Salmon River will continue to flow straight into an abandoned mine pit.

I urge your thorough and timely review and ask for your consideration of the project, with emphasis on the following:

- After 100 years of mining, most of which took place long before environmental standards were established that are in place today, the Stibnite mining district needs environmental repair and restoration.
- There is no other alternative to restore the site. The proposed Stibnite Gold Project is an opportunity for a private company to invest in restoring public lands, with the guidance of state and federal agencies. No action is not an acceptable option.
- The Stibnite Gold Project will re-establish fish migration for the first time since the 1930s, eliminating sediment washing down Blowout Creek, and remove reprocess and safely store historical tailings and waste rock are examples of the environmental benefits provided by the Stibnite Gold Project.
- Restoring the natural flow of the East Fork of the South Fork of the Salmon River, repairing impacted waterways and adding critical riparian habitat will have a positive impact on water quality and wildlife upstream and downstream.
- After extensive alternative analyses and drawing on local community and public input, the project appropriately identifies Burntlog Road as the best access road to provide safe transportation to site, avoiding travel adjacent to fish-bearing waterways.
- Midas Gold Idaho's plan to bus 90 percent of the workforce to site goes above and beyond to promote safe travel, limit noise and safety concerns, and reduce greenhouse gas emissions.
- Building reclamation into the mine plan concurrently with operations protects public lands and is a commendable investment in environmental stewardship and sustainability practices.
- As is already established by federal and state land management agencies' rules and regulations, the project will be fully bonded for clean up before mining begins. I encourage the U.S. Forest Service to work with the company to set out a plan for bonding and mitigation and to communicate that plan to the public.
- The positive economic impact to rural communities in Idaho should be at the forefront of the review and development of the Environmental Impact Statement.
- The project will be an important source of state, local, and federal tax revenues, estimated in the 2014 PFS to be \$329 million in federal corporate income taxes and \$86

million in State corporate income and mine license taxes.

- A U.S. source of antimony is critical to alleviate foreign dependence on a mineral that is essential to many military defense, consumer safety and energy products.
- With 88% of the lands in Valley County being contained in National Forests, the County supports its schools and services based on taxes on the remaining 12% of the lands placing a significant burden on the local population. Based on the project's preliminary feasibility study, on which the PRO is based, the Stibnite Gold Project will generate significant federal, state and local taxes for nearly two decades estimated to be \$329 million in federal corporate income taxes and \$86 million in State corporate income and mine license taxes. These economic benefits tied in with the environmental restoration of the site provide a win-win for the public and citizens of the surrounding communities, the state and the general population.

Midas Gold Idaho wants to invest \$1 billion in Idaho, bring hundreds of jobs to rural Idaho and improve Idaho's public lands. This is the type of project Idaho needs and that the northwestern states have been lacking. I strongly encourage the U.S. Forest Service and cooperating federal and state agencies to proceed with the Plan of Restorations and Operations as the preferred alternative moving forward. Thank you for your time.

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Regards,  
Tom Smith, P.E., P.G.

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