

Virginia Gillerman
2974 E. Hard Rock Dr.
Boise, ID 83712
September 13, 2020

Linda Jackson
Payette Forest Supervisor
500 N. Mission St., Bldg. 2
McCall, ID 83638-3805

<https://cara.ecosystem-management.org/Public/CommentInput?Project=50516>

RE: STIBNITE GOLD PROJECT

Dear Ms. Jackson and Payette Forest:

This is a brief comment, sent as a private citizen and Idaho resident, on the DEIS for the Stibnite Gold Project (SGP). I am an economic geologist for the State of Idaho and have conducted research in the Stibnite Mining District. I am knowledgeable about the area and the mining business. However, the comments below are strictly in my capacity as a private citizen.

The DEIS is one of the most detailed and comprehensive that I've seen in my 40-year career as a geologist. That befits the complexity and historical legacy of the Stibnite region, which includes a mine operated during two world wars – in part with the help of the federal government- as an important producer of antimony and tungsten, two critical minerals then and now. For the SGP, gold is the economic driver but antimony, used in fire retardants and alloys, will be an important byproduct – and Idaho could be the only domestic producer. The Yellow Pine – Stibnite region has been heavily impacted by historic mining, and this proposal by Midas represents the only way to remediate many of those past impacts. The result, as designed and modeled by Midas Gold' engineers, geologists, planners, and environmental team, may not be perfect but neither is the current situation. The bottom line is that only by extracting the gold is there money to actually pay for restoration or environmental improvement to the area. In addition, the economic benefit to the communities in Valley County would be substantial. From my personal observations over the past 30 years, except for mining and exploration and a few recreationalists, the area is not utilized by tribes or others. Nor is it within a wilderness area.

Midas Gold has shown a sustained and professional commitment over nearly 10 years and tens of millions of dollars invested to date in the project. That is much more than the many NGOs, tribal groups and others who oppose doing anything due to their NIMBYism. The SGP site is located on public land (about 1500 acres of USFS managed lands) with a mandate of multiple use, plus some 560 acres of private land including sites of previous mining and milling. This is not pristine wilderness and while some may not like the current mining law, multiple use or NEPA, those are the valid legal frameworks for such a proposed operation. Alternative 4 uses

an existing access road up the East Fork of the South Fork River, and that access road is also a major recreational route. Midas has worked hard to balance tourist and exploration/mine traffic and demonstrated that such coordination is possible. The careful pit sequence of mining and concurrent backfill with waste rock is a reasonable plan, and along with detailed practices in the Midas' proposal, monitoring and assistance of state and federal regulators, most hazards can be avoided or mitigated. It won't be perfect, but it is manageable, as was mining at Stibnite during a world war.

The details of the proposal and plan can and will be adjusted prior to the Final EIS. Let specific technical comments and revisions to improve the project be incorporated into the Final EIS. To the lawyer's delight and profit, there will be lawsuits, regardless of the Forest Service's Record of Decision. The legal delays are what the opponents of the SGP are aiming for, and they may be unavoidable – even ultimately preventing restoration or mining. The DEIS analysis of all the many issues appears adequate and comprehensive overall; discussion of technical specifics should not and will not end with the ROD.

The mineral deposits at Stibnite are unusually rich and rare, which of course is why Midas Gold has spent the time and money pursuing the project. If the Stibnite Gold Project is allowed to proceed, I expect Idaho will have a valuable mine, good-paying jobs, and a showcase environmental restoration project in 20 years. The truth is that our modern lifestyle demands more and more resources and smarter solutions to pay for the toys we humans use daily. Mining provides the components for those smart phones and other essential items and the gold to pay the bills for cities like Boise and McCall.

Sincerely,

A handwritten signature in black ink, appearing to read "Virginia S. Gillerman", with a long horizontal line extending to the right.

Virginia S. Gillerman, PhD, PGL-1524
Geologist and Boise Resident