



Mining – Geological – Hydrological – Environmental – Maintenance

September 14, 2020

Linda L. Jackson  
Payette Forest Supervisor  
USDA Forest Service  
Stibnite Gold Project  
Payette National Forest  
500 N. Mission Street, Building 2  
McCall, Idaho 83638

Re: EIS No. 20200165 Public Comment, Endorsement of Stibnite Gold Project – Midas Gold

Ms. Jackson,

Good day. I thank you and your colleagues for providing convenient access to public documents and a convenient way to submit public comments. Having been aware of the Stibnite Project of Midas Gold for several months, recently the opportunity arose to review some of the pertinent documents on the Forest Service website. I bring to this review forty-four years of engineering and geology achievements, including permit projects as an agent for applicants and in other cases as agent for regulators.

### **Economic Development and Environmental Restoration**

Firstly, the project will bring substantial economic development to local communities while providing a national source of the critical element antimony. In so doing, the project will repair and restore an area which had been abandoned in accord with legacy practices, and which in the ensuing years the public sector has not been able to repair and restore.

I am prepared and qualified to discuss four additional outstanding aspects of this proposal:

### **Blowout Creek Repair**

The repair of the area affected by the failed hydroelectric dam (1965) will be a very positive action. The proposed tails recovery and overall drainage restoration will greatly improve the site for future generations.

### **Meadow Creek Tails**

As the legacy facility stands, it is unlined and degrades surface water. Midas Gold proposes to reprocess these tails and replace the facility with a lined structure complying with regulations and meeting Best Available Technology. Thickened tails deposition and storage incorporates excellent water management and geological engineering practices.

### **Yellow Pine Pit Restoration**

The legacy configuration precludes spawning in the upper East Fork South Fork Salmon River. The proposed plan of operations will entail a diversion tunnel for the EFSFSR during the nominal twenty-year mining operation. Upon closure and reclamation, the surface flow will be restored to a gradient which accommodates spawning. That will restore more than twenty miles of historic spawning grounds.

### **Optimal Resource Utilization**

A classic way the Stibnite Team is showing successful creativity is in the planning for lime (CaO) sourcing. Lime will be used for pH control in grinding, flotation, neutralization and gold recovery. At 70,000 ton per



year, it will be the Project's single largest consumable by weight. Typical transport loads will be 24 tons, indicating 2,917 loads per year, eight per calendar day (Table 12-4, Plan of Restoration and Operation Executive Summary). The PRO Section 12.3.5 touches on substitution, and the current project summaries indicate significant substitution from onsite will be available from overburden within the West End Pit, with commensurate reduction of the traffic load transporting imported lime. [<https://midasgoldidaho.com/wp-content/uploads/2017/05/2016-09-21-Stibnite-Gold-PRO-Chapter-12-Logistics.pdf>] That is further developed in Section 2.4.5.3 of the Alternatives Including the Proposed Action [[https://www.restorethesite.com/wp-content/uploads/2020/08/20200807\\_SGP\\_DEIS\\_Chap-Alternative-2.pdf](https://www.restorethesite.com/wp-content/uploads/2020/08/20200807_SGP_DEIS_Chap-Alternative-2.pdf)].

### **Summary**

Across the years, diligent evaluation and analyses have included state of the art techniques by reputable personnel and firms. The upside potential for this project is substantial – economically and environmentally. The pre-Project status is damaged and untenable. The Project, Alternative 2 in the DEIS, will restore the area at the risk of the proponent and to the benefit of the environment and the nation at large. I strongly encourage the Forest Service to approve the Midas Gold Stibnite Project, Alternative 2, for those benefits as noted above.

Again, thank you for this opportunity.

Respectfully,

*Ralph R. Sacrison*

Ralph R. Sacrison, PE