

24 October 2020

United States Forest Service  
Attn: Linda Jackson  
Payette Forest Supervisor  
500 North Mission Street  
McCall, ID 83638

Dear Ms. Jackson;

I am writing to comment on the Payette National Forest's Draft Environmental Impact Statement #50516 and appreciate the opportunity to do so. I am a retired licensed professional (ID #P-4441) Mining Engineer with more than 36 years experience in the exploration, permitting, development and operation of mines in the western United States. During my career I also had the privilege of serving as a member of Resource Advisory Councils for the BLM (Upper Snake and Idaho Falls Districts) and USFS (Caribou-Targhee Recreation RAC). I was impressed by the knowledge, skills, abilities and devotion shown by agency personnel. Over those years I saw and experienced the development and implementation of a number of new laws, rules, and regulations on both the State and Federal levels. It's not without a little pride that I can say that the mines I had the opportunity to manage were on many occasions recognized by different Federal and State agencies for their achievements in operations, reclamation, and safety. I am also a resident of McCall, Idaho.

DEIS #50516 represents an outstanding review and evaluation of Midas Gold Idaho proposed Stibnite Gold Project. I believe it to be a thorough and complete evaluation of the proposed action. The USFS and other cooperating agencies have done an excellent job of reviewing and evaluating the proposed action, possible alternatives, and their real and potential impacts on the natural and human environment. As has been noted in these and other documents, the proponent as holder of mineral patents has a right to the development of these resources. It's the job of the agencies to ensure that this development is done in a manner that will minimize the impacts to the surrounding environment and this DEIS is an excellent footing to base permit conditions, bonding, and other review conditions upon. I believe the public can be assured that Issuance of a Final EIS, subsequent permits and other records of decisions, based upon this document and the research and evaluations it includes, will be sound and justified.

The Stibnite Gold Project represents a unique opportunity to cleanup an historic mine area, improve water quality in the East Fork, South Fork, Salmon River and associated small creeks, and restore vegetation cover on areas previously disturbed prior to current environmental law and regulation. It's only because of the mineral value proposed to be recovered by Midas that this work will be done in the foreseeable future, if ever. My experience on the Caribou-Targhee RecRAC showed me the limited level of funding provided the USFS and other rescue agencies by Congress. Simply

said the federal and state agencies neither have nor will have the financial ability to address a situation the size and magnitude of the past mining of the Stibnite area. It's my understanding that Midas has no legal obligation to remediate the prior disturbance but has voluntarily through this proposal proposed a solution that will restore fish passage through the site to historic spawning grounds and significantly improve water quality at the site and hence downstream.

I agree with those who oppose the proposed action that sufficient bonding by the operating company is critical to protect the environment and the public. However, I would note that in recent years many companies operating on federal and state lands in Idaho and other western states have entered into innovative bonding schemes and mechanisms that provide the necessary assurance that funds will be available for the agencies should an operating company default on its future obligations. Bonding options exist such that past horror stories shouldn't interfere with development of the Stibnite Gold Project.

As a resident of McCall, I've read and heard the protests of others over the socio-economic impact of the proposal. However, my experience in similar small, rural communities is just the opposite. True, some of the positive (and negative) economic impacts will be spread over other areas outside of Valley County. The recently past economic recession and ongoing COVID 19 crisis should have shown the difficult times a single (tourism) source economic model yields. I remember when every storefront in downtown McCall had a business in it. Now, many are empty and have been for several years. A tourist economy can be great but when the snow doesn't come or travel out of the Boise Valley is restricted, stores and restaurants have to close. Again, based on my experience in small town Idaho, I expect that mining operations will be up and down but overall the positive impacts will be at or greater than those predicted in the DEIS. And yes, the time will come when the mine will close but again experience shows that once operations start exploration often develops other resources that extend the mine life and in any case, local communities have time to plan for that event.

What I've seen of Midas Gold Idaho's plans, management and actions has been exemplary. They have been open to a fault. Their actions to work with local communities and concerned parties outstanding. They have repeatedly taken voluntary action to minimize and pay for their real and even perceived impacts on impacted communities. I expect they will continue in this manner during operations and through remediation activities. Should impacted communities have concerns about this, then I'd suggest they should work with Midas and the appropriate agencies to see that their specific concerns are included in the final terms and conditions of the appropriate permits and approvals.

I support approval of Alternative 2. Alternatives 3 and 4 have limited and tenuous benefit with offsetting increased risk. Those seeking use of the existing Johnson Creek and South Fork roads seem primarily to be asking for an improved road used by themselves and paid for by the mining company. Past operations have demonstrated

the risk of having heavy truck traffic adjacent to the river. The proposed route from Yellow Pine along the East Fork to the mine site would be asking for trouble. Despite the nearness of the proposed Burntlog Route to the wilderness, the amount of traffic is sufficiently low that I believe the impact to be minimal and the increase in safety and environmental protection more than offsetting.

Over my career I have seen responsible mining operators (including Midas and their cooperators) increase their awareness and responsiveness to environmental concerns. Mining and environmental law has followed in many cases and led in others such that today the public has 1) an active seat in the process, 2) basic legal requirements are in place to protect the environment from what is known and knowable at this point of the process and 3) both the law and most permits have provisions that require monitoring and action should conditions change during the course of mining. When I first started mining in Idaho, my employer was the first to submit a reclamation plan to the State Department of Lands and that plan was probably less than 10 pages in length. Today a mining plan for operations on Federal, State, and/or private lands requires years of research, study, modeling, and review costing millions of dollars over several years

In conclusion, I support Alternative 2 of DEIS #50516 and urge the USFS and cooperating agencies to move forward with issuance of the Final EIS and other required permits in an expeditious manner.

Respectfully,

David W. Farnsworth, PE (retired)