

Oct. 28, 2020

To: Linda Jackson, Forest Supervisor, Payette National Forest

From: Robert Bryant (email: bobbryant44@comcast.net)

Subject: Comments and Concerns regarding the **Stibnite Gold Project**

I have significant concerns about the Stibnite Gold Project (SGP) plans as written in EIS #50516. A primary concern with this project is that at project completion, Midas Gold plans to leave behind 100 million tons of hazardous tailings over 413 acres of the pristine Meadow Creek valley behind a 460 foot high embankment, and also leave two very large hazardous pits that will fill up with water but be unsafe for recreational use. The planned surface-dumped tailings storage facility is 30 times the size of all previous tailings dumped on the Stibnite site over the past 100 years. This is NOT “restoration”, which Midas Gold claims is such an important aspect of this project.

If the SGP is permitted as indicated in Alternative 2 of the EIS, the environmental issues with the tailings storage facility and open pits will persist well beyond the completion of the SGP.

The US Forest Service is responsible for the long-term environment, safety, and use of our National Forest surface areas. To meet this responsibility, the US Forest Service needs to address the tailings storage facility and pit issue now. If this issue is not dealt with now, the valuable gold from this area will be long-gone leaving future generations to live with and deal with these environmental problems.

How can the US Forest Service mitigate this major issue? It should not allow the tailings to be dumped on the surface. It should require that the tailings be placed back into the pits from where they originated. Midas Gold should also be evaluating the reuse/recycling of tailings. There are recent mining projects around the world that are reprocessing and recycling tailings to reduce their environmental hazards.

Midas Gold tries to make the case that it is not cost-effective to put the tailings back into the mining pits. Although it is more expensive to put tailings back into the pits rather than dumping them on the surface, there are mining projects around the world that are doing just that, since they are being required to restore their mining grounds.

The “not cost-effective” case has been used for a long time by the mining industry to allow them to make short term profits and then leave behind environmental hazards and damage. The EIS spells out another case of this. **What does the price of gold need to be to make putting tailings back into the pits cost-effective?** Midas Gold has made the case in earlier documents that the SGP is profitable at a gold price of about \$600/ounce. Current gold prices are over \$1,800/ounce. It seems apparent that the reason Midas Gold says that putting the tailings back into the pits is not cost-effective is because it is less profitable to their investors. Note that their controlling investor with over 40% of ownership is John Paulson, of Paulson & Company, an investment management firm based in New York City.

Midas Gold also mentions in the EIS that there are increased safety concerns with putting tailings back into their mining pits. In the EIS, Midas Gold identifies how they mitigate safety issues while using explosives to break up the rock in pits, safely moving large mining vehicles into and out of the pits, and

protecting against avalanches. Given that they can safely do these tasks, how can they not put tailings back into the pits safely? They are doing this in other mining projects elsewhere. It appears that this is another case of maximizing profits for their investors.

The US Forest Service needs to take a stronger stand for its long-term stewardship responsibility, which includes the surface grounds of their national forests, by not allowing the SGP to leave behind the hazardous surface tailings storage facility and the mining pits. The “not cost-effective” case that is being made by Midas Gold is merely an argument for increasing the profits to their investors, while they are creating more permanent environmental degradation and hazards in the area.