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Organization: Hecla Mining
Title: VP External Affairs
Comments: Attached please find comments from Hecla Mining Company on the proposed Stibnite Gold Project

Thank you for your consideration

On behalf of Hecla Mining Company I am providing these scoping comments on the Stibnite Gold Project Environmental Impact Statement ("EIS") in response to the U.S. Forest Service's Federal Register Notice of Intent to Prepare an Environmental Impact Statement published in the Federal Register in Volume 82, Number 106, Page 25759 on Monday, June 5, 2017. We are submitting these comments electronically and in hardcopy.
Hecla Mining Company is a 126 -year old Idaho based precious metals mining company. We have extensive experience in mine development, operations and closure and with the environmental permitting requirements under the National Environmental Policy Act, and in the U.S. Forest Services' surface management regulations for hardrock mining at 36 CFR Subpart 228A. We operate the Greens Creek Mine in Alaska located on lands managed by US Forest Service and Admiralty Island National Monument. We understand the rigorous environmental review process as we recently acquired two exploration projects in Montana on US Forest Service managed lands that have been in the permitting process for nearly two decades.
In the early 1990's  Hecla did operate a small heap leach facility in the Stibnite Mining District. This facility was fully reclaimed, the State of Idaho Cyanidation permit closed out and all financial assurances returned to the company.
We appreciate the opportunity to provide these comments and urge the federal agencies with regulatory jurisdiction over this project to complete the EIS process as quickly as possible so the environmental benefits of this project can be realized.
Brownfields Restoration and Economic Development
The Stibnite Mining District has had an extensive mining history. For example, during WW II this district produced more than 90% of the nations' antimony and 65% of the Tungsten, materials that were used for munitions, steal making, fire retardants and other purposes. Mining of these materials was considered so critical to our war efforts that the federal government subsidized the mining activity. Unfortunately, these activities occurred when our nation's environmental ethos was very different than today and the surface effects from this mining were left unreclaimed.

Midas Gold recognizes that redevelopment of the previously mined lands provides a unique opportunity to clean up existing disturbed sites and reclaim previously impacted areas. To ensure this opportunity is captured, Midas will be required to post significant financial assurance for reclamation of its activity and environmental improvement. This is a win-win situation that provides environmental restoration and economic opportunity for Valley County and the State of Idaho.
Some of the most important environmental benefits that would result from redevelopment of the Stibnite Gold Project as described in the PRO include the following:

[bull] Development and restoration of a viable fish passage that has been closed off since 1938. Development of the new passage will allow fish access to nearly 6-linear miles of stream channel and creation of significant new wetlands and aquatic habitat.
[bull] Repair and restoration of nearly 10 miles of stream channels and riparian habitat.
[bull] Repair or build over 350 acres of wetlands and 95 acres of open water habitat.
[bull] Remove some 10 million tons of legacy material from the historic era mining to reduce metal loading to surface waters.

In addition to these environmental benefits, the Stibnite Gold Project will create many much-needed jobs, employing up to 1,000 people during the three-year construction phase and about 500 people during the 12 to 15-year mine life. These jobs will create a much-needed boost to the local, regional, state, and national economy. The project will be an important source of state, local, and federal tax revenues, estimated to be $329 million in federal corporate income taxes and $86 million in State corporate income and mine license taxes.

Proposed Project Thoroughly Developed

Appendix G of Midas Gold's Plan of Restoration and Operations (PRO) is an extensive analysis of project alternatives. It is clear from this document that Midas Gold has devoted considerable effort to evaluate potential locations for the project facilities and different mining methods. This analysis should greatly assist the federal agencies in the timely permitting of the project.

Their efforts have included considerable community outreach and involvement so their alternatives analysis takes into account input from community stakeholders in the planning and design of the Stibnite Gold Project.

For example, after input from local community members, Midas Gold examined the "Burntlog Route", which is approximately 72 miles from State Highway 55 near the town of Cascade to the Project site. The Burntlog Route would avoid travel adjacent to Johnson Creek and the South Fork of the Salmon River, with minimal travel adjacent to the EFSFSR that would be necessary in the final approach to the

Project site. This routing would also bypass the community of Yellow Pine and residences along the Johnson Creek road, thus eliminating (or greatly reducing) Project-related traffic in those communities.

Based on our review of the PRO and Appendix G, it appears that Midas Gold's proposed plan has considerable merit and represents the most practical and effective approach to redeveloping this mine, cleaning up the environment, and restoring the watershed.

The Stibnite Gold Project, as submitted to the US Forest Service in Midas Gold Idaho's PRO, is good for Idaho's people, environment and economy. I urge your thorough and timely review.