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Organization:

Title:

Comments: Attached are my comments and recommendations for the Midas Gold Project. Thanks, Don Bailey

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3 September 2020

Subject: Project 50526, DEIS for Midas Gold Stibnite Project

Although I am currently a member of the Board of Directors for Midas Gold Idaho, a subsidiary of Midas Gold Corporation, my comments below are based on my previous relationship with the Stibnite community and mining operations as conducted by the Bradley Mining Co. In 1928 my father, Harold Bailey, fresh out of the University of California, was employed by Bradley as the mining engineer for the original underground mine (Meadow Creek Mine). When he first started this job, the site was very remote, with no roads and only a rather primitive trail into the valley from Yellow Pine. There was only one small building at the site, constructed the previous year by Bradley workers to serve as a living space and shop. Over the next 10 years, the company successfully mined the Meadow Creek gold deposit and developed a small community, which enabled the workers and their families to have a reasonable living during the great depression.

Before the start of WWII, the Federal Government, attempting to locate needed minerals for the expected war effort, did some exploratory drilling in the area and discovered a large tungsten deposit. With the entering of the United States into the war, this deposit turned out to be a significant resource for this needed metal. The location and mining of this tungsten ore body also led to the discovery of a large mineral deposit of antimony, gold, and silver. At the conclusion of the war, the tungsten was totally recovered, but the company decided to continue mining to recover the gold and antimony. For a few more years, this added mining and recovery was economically viable; the company employed several hundred workers, especially with the decision to construct a smelter on-site for the recovery of metallic antimony and gold. Unfortunately, with rising costs against a fixed price structure for both gold and antimony, the operation could no longer produce sufficient profits, so the decision was made to close the mine in 1952. My father had accepted a position with another mining company, so our family had already moved to California.

My interest in this project, as proposed by Midas Gold, is based largely on my history with the site. My two older brothers and I attended all eight grades at the Stibnite Elementary School. My younger sister was born at the Stibnite Hospital, and our family enjoyed the somewhat remote life in the Idaho backcountry. I remember many activities, with family and friends, including hunting, fishing, skiing, hiking, and long pack trips with the horses. With the construction of the Stibnite airport and other community facilities, life at Stibnite became quite enjoyable for the employees and their families. Thus, my recollections are based mainly on those any child would recall, especially the village life of Stibnite and the activities available to a youngster. My attachment to this beautiful region of Idaho is based on my memories of those days.

I honestly believe that Midas, if their proposed project is approved, can make good on the plans to perform considerable repair of past mining activities. When all mining in the valley of the East Fork has ended and planned repairs are completed, nature will have a good start in returning the valley and hillsides to a more attractive condition, allowing future generations to enjoy this special part of Idaho. It is very unlikely that the needed restoration work would be accomplished by any other reasonable manner due to the significant cost and

time required. From the preliminary feasibility study completed by Midas, this needed restoration and reclamation work can only be achieved in conjunction with the proposed mining project to recover the gold, antimony, and other metals at the site. This is quite clear when one considers the more recent mining done by the companies, which concentrated only on the more easily recovered gold using the heap leaching process. Extraordinarily little restoration work was completed by these companies when their work ceased.

There has been opposition to this project from organizations and individuals based on expected damage and interference with the local fisheries population, especially salmon and steelhead trout. However, during and after the mining performed by the Bradley Company from 1928 through 1952, the local migratory fishery population was quite robust. I can recall observing large spawning populations progressing upstream along the local tributaries of the Salmon River, including the South Fork, the East Fork, and Johnson Creek. Apparently, this migration was not impacted in a noticeable way, even though the Bradley company did not contain the mining tailings but allowed it to flow downstream after the milling process was completed. Later, an effort was made by the company to retain the spent tailings by collecting it south of the milling operation on the flat next to Meadow Creek. More recent observations of the local fishery situation on the Salmon River and its tributaries has led to the conclusion that the primary cause of interference with the fish migration is the construction of the four dams on the lower Snake River. A Federal judge has even decided that the removal of these dams is now required to restore these migratory fisheries in Idaho.

With the mining project proposed by Midas Gold, I do not believe that the current fishery population will be impacted, and even could be improved by removing the current barrier resulting from the very steep stream flow of the East Fork into the Yellow Pine pit. Other good ideas received from the public have been incorporated by Midas Gold, such as the use of the Burnt Log road as the main access to the mining site as opposed to the current East Fork road from Yellow Pine.

One of the alternatives included in the PEIS would be to locate the tailings storage facility on the upper reaches of the East Fork of the South Fork. I strongly oppose this alternative, as doing so will completely alter the environment of this nearly untouched area of the East Fork. However, I do recall that an old road or trail connected the main road to Monumental Summit with the Thunder Mountain Road atop Mule Hill. We frequently used this route via horseback when living in Stibnite; this old road now is not usable with deterioration and loss of a bridge.

I therefore support the plans by Midas Gold, as outlined in their Plan of Recovery and Operations, and will, in my role on the Midas Gold Idaho Board, contribute and encourage the company to see this project through to a successful conclusion.