

Data Submitted (UTC 11): 10/27/2020 6:00:00 AM

First name: Tricia

Last name: LaRue

Organization:

Title:

Comments: Thank you for the opportunity to comment during the Draft EIS (DEIS) period for the Stibnite Gold Project. I am writing to express my support of Midas Gold Idaho and the Stibnite Gold Project (SGP).

As a NEPA practitioner for 20 years I am all too familiar with the level of effort a DEIS of this size encompasses. Reading the DEIS, it is immediately apparent that Midas Gold Idaho has been proactive with their NEPA process working closely with the Forest Service and cooperating agencies to develop a proposed action that balances engineering design within a historically-impacted environmental setting. It is clear the SGP is a solution for the reclamation and restoration of the Stibnite Mining District while accomplishing the goal of mining a critical mineral (antimony). This is an opportunity to not only boost the economy, but to do it in a responsible way in which Midas Gold will restore a historic mining district that has been left a brownfield site for nearly a century. This mining, re-mining, reclamation, remediation, and restoration has been clearly presented as Alternative 2.

As outlined in Chapter 5, Midas Gold Idaho has been working closely with agencies to develop a comprehensive and environmentally responsible alternative since 2016. The development of the DEIS was completed with participation by the Forest Service's Interdisciplinary Team and other participating cooperating agencies with jurisdiction by law or special expertise. These include the U.S. Army Corps of Engineers; U.S. Environmental Protection Agency; Idaho Department of Lands; Idaho Department of Environmental Quality; Idaho Governor's Office of Energy and Mineral Resources; and Valley County, Idaho. Therefore, the DEIS contains well-informed decision-making through identification and analysis of the probable environmental impacts of a proposed action, the no action alternative, and a reasonable range of other alternatives.

Under Alternative 2, water resources, specifically water quality, would be improved from existing conditions as outlined in Section 4.9 of the DEIS. The presence of legacy mine waste materials has led to a baseline of elevated concentrations of arsenic and antimony in groundwater, and elevated arsenic, antimony, and mercury in surface water and seeps. Under Alternative 2, Midas Gold would limit potential surface water quality impacts by constructing a centralized, active water treatment plant (Centralized WTP) to treat mine contact water and open pit dewatering water. The goal of these active systems would be to treat mine contact and dewatering water to meet applicable surface water quality standards for arsenic (0.010 mg/L), antimony (0.0052 mg/L), and mercury (0.000012 mg/L). This would be an improvement over existing conditions.

Alternative 2 would also restore the flow of the East Fork of the South Fork of the Salmon River and open habitat for anadromous salmonoids. The positive impacts of removing passage barriers would outweigh the potential negative impacts. Removal of some barriers allows for free movement and access to habitat for both upstream and downstream fish and, in turn, can improve genetic diversity of isolated populations, improve overall productivity by increasing access to critical habitat, and improve access to feeding and refuge areas. Establishing access by removing artificial barriers may facilitate reclamation of upstream habitat and biodiversity.

From the perspective of being an Idaho resident, this project would greatly benefit the Idaho economy. Specifically, the SGP would result in direct and indirect socioeconomic effects on communities within the local analysis area (i.e., Valley and Adams counties and associated communities of Cascade, Council, Donnelly, McCall, New Meadows, and Yellow Pine). It is anticipated that most construction workers (ranging from 50 to 85 percent) are expected to be Idaho residents. Under the mid-value scenario, it is expected that SGP construction would provide employment for 640 employees of which 420 would be Idaho residents. During the construction phase, it is projected that approximately \$66.7 million in salaries and wages would be paid annually to these local construction workers on average over the 3-year construction period. These local jobs would contribute to the local economy and could improve the standard of living for the employees and their families.

I encourage the USFS to permit Midas Gold Idaho's project as outlined in Alternative 2 of the DEIS since it meets the purpose and need for the project, provides additional avoidance and mitigation measures to address significant impact issues, and is the most technically and economically feasible of the alternatives.