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First name: Bert
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Organization:
Title:
Comments: October 27, 2020

Ms. Linda Jackson, Payette Forrest Supervisor

U.S. Forest Service, Payette National Forest

Dear Ms. Jackson,

Attached to this text are my Midas Gold Project comments in support of the Stibnite Gold Project.

Also attached is my letter to the editor of the McCall Star newspaper. In this letter to the editor I respond to a letter to the newspaper that makes many false statements about Barrick Gold Corp, an investor in the project.

Please include both attachments as comments in support of the Stibnite Gold Project.

Thank you,

Bert Jeffries

Salmon, Idaho

Please include this letter of support for Midas Gold Idaho's Stibnite Gold Project.

Additionally, also to be included as a comment, I have attached my letter to the editor of the McCall Star newspaper. My letter responds to correspondence to the McCall Star where the author purposely misrepresented the environmental record of Barrick Gold Corp, an investor in Midas Gold, (Midas).

I am a graduate of a school of mines with a Bachelor of Science degree in exploration geology and have been employed in the mining industry for over 40-years. I have worked on mine construction and exploration projects in Africa, South America, the United States and Canada.

As an exploration geologist I managed the initial discovery and development of the Beartrack Gold Mine located

at the historic Leesburg ghost town, near Salmon, Lemhi County, Idaho, Salmon-Challis National Forest.

I managed the Beartrack project from initial discovery in 1988 through permitting and mine development in the early 1990[rsquo]s and further as an employee of a contractor who constructed 20-acres of designed wetlands at Beartrack and also managed the constructed wetlands project at Hecla Mining's Grouse Creek project on the Yankee Fork near Stanley, Idaho.

During the Beartrack mine development in the early 1990's I was awarded the Environmental Coordinator of the Year by the project regulatory agencies, including the USFS, BLM, and Idaho Dept. of Environmental Quality, Idaho Department of Lands, Idaho Department of Water Resources, and the Idaho Department of Fish and Game. I have also worked as Project Manager on a large mine closure project in Chile, South America, the first mine closure project in Latin America to be completed under a government approved mine closure plan.

The Stibnite Gold Project offers a unique opportunity to combine the economic benefits of a mine operation and the ability to restore the environmental degradation of a historic mine site with a long history of past pre-Midas unregulated mining activity.

Having studied the proposed Modified Plan of Reclamation and Operation, (ModPRO) which describes in detail mining, environmental management and reclamation plans for the operation including description of the mining and milling plan, surface water management, re-processing historic mill tailings which are currently polluting local streams and groundwater, it is obvious that the life of mine operation will result in improvement of the quality of the Stibnite project environment.

Midas Gold has also prioritized solving the largest source of sedimentation in the watershed, which has been an ongoing issue since 1965 following the dam failure at Blowout Creek. While this legacy feature is not within the footprint of the proposed mining operations, Midas Gold is investing in a solution to stop the sedimentation and subsequent water quality and fish habitat degradation during the first years of the Project. By addressing Blowout Creek, the habitat and water quality of the region will be improved. This commitment by Midas demonstrates their willingness to exceed basic environmental requirements and speaks highly of the corporate philosophy toward environmental stewardship.

Another very large positive for the project is the willingness of Midas to commit to implementing a very costly investment to reestablish pre-mine fishery habitat. This dedication far exceeds current industry standards and for this, Midas should be commended.

The ModPRO provides detailed descriptions of waste rock storage facilities, wetland restoration, salmon fishery habitat improvement, and protection of surface water and groundwater quality.

Midas[rsquo]s plan to add geosynthetic covers to rock storage facilities to limit infiltration and protect water quality far exceeds environmental practices at contemporary mining operations. Midas Gold is to be commended for including this in their operating plan.

I also commend the plan to double line the tailings storage facility, (TSF). I have worked on a number of projects with large TSFs, and this is another very expensive design inclusion and underscores Midas[rsquo]s dedication to implementing a very well-engineered, environmentally responsible project. The TSF liner design follows Idaho Department of Environmental Quality[rsquo]s rule that governs ore processing by cyanidation. The IDEQ rule governs the process plant, TSF, pipeline and pond designs. The design includes leak detection and underliner leak collection system. From my experience, this is a key component of the project and am confident this design complies with all requirement for TSF construction.

I have been directly involved in the development and construction of mine projects in Africa, South America,

Canada and the United States, and in my experience, the economic benefits to local communities is not just defined by salaries and local taxes collected. Mines are typically not located in or near large population centers, but usually are in rural sparsely populated areas with below average family income levels. The contribution of a project like the Stibnite Gold Project to local rural communities is difficult to define because this project will not only provide direct investment in local businesses and provide good paying jobs, but will also positively affect area schools, colleges and community groups.

From my experience, an annual payroll of close to $50 million will have a large positive benefit to local economies, and increasing the average annual compensation of workers to around $80,000 per year will incredibly benefit the overall quality of life in local communities.

After reviewing information related to the development of Midas[rsquo]s Stibnite Gold Project, I am very impressed with the environmental program proposed and the detailed description of the project from construction design to the description of the mine and milling operation, the positive impact of the operation on local economies and the plan for environmental restoration of the mine site from historic pre-Midas mining activity.

I have world-wide experience in constructing and developing mine projects and I strongly support the Stibnite Gold Project and urge the U.S. Forest Service to approve the operating plan and allow Midas Gold to proceed with this very well designed project.

ATTACHMENT: Midas Gold Letter To Editor of the McCall Starr, Dated December 4, 2019