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Thank you for the opportunity to comment during the Draft EIS period for the Stibnite Gold Project. After studying the DEIS at some length and as a resident of Idaho; a property owner in Valley and Canyon Counties, Idaho; an area recreationist and someone with over 40 years of experience in all aspects of environmental management of global mining operations especially in the Western U.S. and Alaska, I offer the following comments for your consideration.

As part of the Stibnite Gold Project, Midas Gold will be responsible for mitigation and restoration related to its new mining activities. Mining companies must reclaim the land when their operations are completed and provide state and federal regulators with reclamation bonds to guarantee the work will be properly performed before any mining begins. That means the plans put forward by Midas Gold and approved by the USFS are not optional. The Draft Environmental Impact Statement (EIS) released in August thoroughly details the environmental issues related to the historic Stibnite mining operations currently impacting the region's environment and ecosystem. I believe Alternative 2, as proposed by Midas Gold, provides the best option for removing, storing and reclaiming historically mined materials and areas that have been releasing antimony and arsenic into local surface and ground waters for decades. The draft EIS states that solutions from Midas to remove legacy waste and manage water provides long-term reduction in metal loading in ground and surface water (Ch. 4 Section 4.9).

The DEIS has applied the best science in understanding the existing environment and the impacts that would be associated with the project alternatives, especially Alternative 2 and in particular for the areas of mined material geochemistry, surface and ground water hydrology and quality and aquatic biota (especially resident and anadromous fish species). Alternative 2 also incorporates additional project design features that reduce environmental and social impacts. Chief among these are: 1. Construction of a pre-mining fish passage tunnel that will better support stream base flow and resident and anadromous fish movement during mining and reclamation operations, 2. On-site accommodations for mine employees significantly reducing traffic on existing access roads for local residents and recreationists, 3. Improving the Burntlog Route to support mine traffic thus further reducing area traffic to Yellow Pine for residents and recreationists and risks to Johnson Creek aquatic resources, and 4. Eliminating the Westend Development Rock Storage Facility by placing of Westend Pit Development Rock as backfill in the Midnight Pit and as partial pit backfill in the Hangar Flats Pit likely improving water quality and aquatic resource values.

Midas Gold Idaho wants to invest \$1 billion in our state, bring more than 1,000 jobs to rural Idaho and still provide access to Idaho's public lands. This is the type of project our state needs, and with the coronavirus, we need it now more than ever. The USFS has provided sufficient time to review the document and provide comments. It is time to move forward. I highly encourage the U.S. Forest Service to approve the Stibnite gold Project and select Alternative 2 as their preferred project alternative.

Most Respectfully,



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