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Comments: I'm writing in regard to the Scoping Request for Midas Gold Idaho's Stibnite Gold Project. I am a retired professional mining engineer (ID PE#XXXX - ret) and former mine manger currently living in McCall, ID. In these roles i have had the opportunity to work through the permitting process for mines on public lands administered by the USFS, BLM, and State of Idaho lands. I have also had the great privilege to serve on public advisory boards to the USFS and BLM. Over my career I've seen both the expansion of permitting requirements and the development of state of the art reclamation techniques along with bonding strategies that protect both the public and operating companies. Several of the mines I had the great opportunity to supervise were recipients of awards for their innovative and successful reclamation work and the last project set new standards for bonding in Idaho.

Regarding Midas' Stibnite project, I would offer the following comments:

1- Our nation's mineral wealth is found where it is, not where an interested third party may wish it to be. Unfortunately that means in this case that the mine is adjacent to high quality waters and even historical spawning habitat for threatened and endangered fisheries. However, the proposed plan of operations also provides an opportunity to improve and perhaps stop on-going discharges to these waters and address other existing habitat concerns of past mining.

2- From an experienced outsider's view, it appears that the proponent has provided an excellent data set of environmental data for the USFS and associated agencies to conduct their assessment. However, I fully expect that the assessment will find data gaps that need to be answered prior to issuance of a Record of Decision (ROD). I would hope and suggest that the proponent be provided opportunity to gather other reasonable and scientifically necessary information without having to restart the permitting process. Many of the questions that I expect will come up may also not be able to be answered properly until the project is able to move forward. I believe that working together, the proponent and agencies can effectively and adequately gather needed scientifically valid information while operations proceed.

3- A challenge to the mining industry is and always has been the ever changing value of the minerals being mined. Oftentimes permitting delays will negatively affect a potential project's ability to move forward and hence its financial viability. I would hope that the agencies will move forward as rapidly as practical to consider, evaluate and reach a ROD in a timely manner. I've seen good proposals from respected mining entities tied up unnecessarily by the "one more" study, data request, review, etc which ultimately led to the project's abandonment. Although we categorize biology, geology, etc as sciences, they aren't exact and any decisions based on these factors have an element of risk involved.

4- Again as an outsider with limited direct knowledge of the plans, geology, biological, and other environment

data, i am however very impressed with what i have seen of that data and the cooperative gathering of that data. The proponent has done an excellent job of attempting to have all the information needed to reach a reasonable ROD in a timely manner.

5- If the agencies reach a favorable ROD, I would hope that it includes a reasonable set of objectives, requirements, etc. that will allow mining to proceed should actual environmental conditions differ from those modeled. Just as remining of the old workings may be a best practice for their remediation, allowing the mine to proceed (with other considerations such as additional or enhanced monitoring or rescheduling of operations to different areas of the property) ensures the participation of the proponent in development of reasonable and effective remediation rather than the past practice which the public still believes permeates the industry of cut and run.

6- Lastly, I believe that the agencies can draw upon their experiences in developing bonding requirements that protect the public and resources while not financially strapping the mining company such that it is unable to proceed. I know that the FS has worked effectively with the industry in Nevada (gold) and Idaho (cobalt and phosphate) to establish effective bonding mechanisms. I am well aware too of the potential long term challenges that face mining projects such as this and therefore, the need (and obligation) for effective long term bonding. I believe and hope that the proponent is willing to work with the agencies to develop just such a mechanism. I would encourage the staff and leadership of the Payette NF to call upon the extensive and excellent resources available through the Sawtooth and Caribou/Targhee NF's and the Idaho BLM District offices.

I appreciate the opportunity to provide this input and look forward to seeing the process move forward to hopefully a favorable ROD. Based on my own experience with Superfund and other existing remediation programs, I believe that the proposed plan of operations (tweaked as appropriate) coupled with agreements and means to adapt to the physical, biological and other environmental factors encountered during mining but unknown (and unknowable) at this time is the best way to address the currently ongoing environmental concerns. Unfortunately, the general public still has a biased and out-of-date impression of the mining industry. The industry I know and what I see in Midas Gold, is different. It is one where the companies know they need to earn their right to operate on public lands and understand their obligation to protect those lands and the associated environment while at the same time providing the mineral resources we need to live the high quality of life we enjoy in this county.

If i can be of any assistance to either the agencies or proponent, please don't hesitate to contact me.