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Comments: I write in support of the NEPA process analyzing the Stibnite Gold proposal in Idaho. This project is notable for a mining project in the focus of restoration prior to further exploitation, and careful planning for the reclamation. This is an exemplary project that shows that mining can be socially responsible and environmentally sensitive.

Though the mine site is situated in an historic mining district, there is still a significant amount of gold and antimony to be mined and used to allow for future manufacturing of the many instruments we all depend on in modern life. Over more than one hundred years, the site has been degraded by traditional mining practices. In the past 40 years (most of my career) we have seen dramatic changes in mining technology. Midas has proposed a plan that will use modern techniques to re-mine existing waste piles and also to restore some of the environment as part of the mining process.

Some of the environmental goals of the project include: rehabilitate stream channels and create wetlands; upgrading the existing Burntlog Road; use of the existing power line corridor to minimize further disturbance; reprocessing historic tailings; reusing impacted areas for waste rock; reusing existing haul roads; re-mining previously mined areas for trace amounts of minerals not captured by older processing techniques; and, using the West End waste rock to backfill the Yellow Pine pit.

Prior to mining, Midas Gold has worked with the local communities and the tribes to develop plans for clean up that will facilitate traditional practices and recreation opportunities. Clearing the waterways and re-establishing the salmon habitat are first steps. For these first steps and initial construction, Midas Gold anticipates providing 700 jobs over three years. The twelve years of operation should provide 500 direct and 500 indirect jobs to an economy that has among the highest unemployment in the country, and is dependent on mining to for a healthy economy.

In terms of scoping for the upcoming EIS, the Forest Service should be sure that the uniqueness of this project is highlighted. This would mean significant analysis on water resources, biological resources (especially salmon, but also habitat restoration for other sensitive species), and socioeconomic resources. Geochemistry and project access will also be significant and will likely suggest some alternatives to accomplish the goals of the project. The U.S. Geological Survey has conducted a significant amount of work, supported in part by Midas, that has informed many aspects of the submitted plan and should aid the Forest Service in addressing the analyses for geochemistry and hydrology.

In my experience with mining projects I've become aware of the difficulty in attracting investment monies, especially when delays occur. The Midas site is a particular example of the general legacy problem for the industry. In approving this project, it will stand as an example of mining "done right" and will provide a template for others in the industry to emulate in restoring old mining sites where ore is still in place. This project deserves to be reviewed in an efficient manner so that it can be implemented as soon as possible.