

Data Submitted (UTC 11): 10/5/2020 3:44:44 PM

First name: Patrick

Last name: Naylor

Organization:

Title:

Comments: Regarding Midas Gold's proposed Stibnite Gold mining project, I am fairly well informed of the advantages and disadvantages of the project. I am very familiar with the site, including past and present conditions, as well as proposed future activities. This includes many trips to the site as well as extensive review of plans, proposed actions, and other related documents.

Previous mining companies have demonstrated callous disregard for their environmental legacy at this unique location near the headwaters of the EFSFSR. While the sins of the grandfathers might be forgiven, the fathers knew better as our understanding of environmental impacts has grown and our priorities have changed. Dakota Mining, which was the last company to mine the site in the 1990s, made some improvements compared to the moonscape left from mid-century mining, but deliberately walked away from its ridiculously small reclamation bond, betraying those who worked to improve the site and leaving the taxpayers on the hook for millions of dollars to remediate impacts.

I believe the plan put forward by Midas Gold is reasonable. While the site can never be returned to pre-mining conditions, it is likely that their proposed reclamation plan would result in substantial improvements to the site, especially with regard to aquatic habitat and, possibly, water quality. It also will provide additional high-paying jobs to the local community for a several years.

Having said that, no one should be under the impression that Midas has only the best interests of the community and environment in mind. Midas must operate profitably to complete the job properly, and sufficient money must be put in reserve to implement its reclamation program. The Forest Service and the State of Idaho must prioritize its oversight and enforcement responsibilities to verify that Midas will follow through on its commitments. Further, unforeseen impacts are inevitable. All mining activities have adverse environmental impacts, that is simply a fact, but at this legacy site, Midas could eventually leave it in better condition than it is now. I therefore support this project, with the caveat that Midas (and any future company that may acquire the operation) be held strictly accountable for implementing its plans and have mechanisms for responding to the unexpected problems that will arise.