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Comments: Attention: Linda Jackson, Payette Forest Supervisor

Date: October 28, 2020

From: Jo Kemper

To All It May Concern:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Proposed Stibnite Gold Project in Valley County, Idaho.

As a consumer, I am strongly concerned about the lack of a track record provided by Midas Gold to demonstrate the company's ability to operate the Stibnite Gold Project as outlined in the DEIS, and follow through with the proposed reclamation, possibly in perpetuity. What happens if Midas Gold declares bankruptcy?

According to the Keith Ridler, "previous mining companies walked away from Stibnite years ago, leaving the cleanup to U.S. taxpayers. The U.S. Environmental Protection Agency has spent about \$4 million since the 1990s restoring habitat. Midas Gold plans additional mining in the two open pits and to create a third open pit. The work would roughly double the size of the disturbed mining area to about 2,000 acres and eliminate some previous reclamation work. But Midas Gold's plan includes cleaning up tailings by capturing gold with new technologies. Ultimately, the company says, it will restore much of the area when mining is finished." (Keith Ridler / Associated Press)

Would you take a company at its word that it will clean things up when it's finished? Consider the demonstrated track record of mining companies in the project area, and their existing failures to safeguard Idaho's water ways from mining pollution. Furthermore, rather than holding the previous mining companies responsible for the pollution in the mining area, according to the Keith Ridler, "British Columbia-based Midas Gold filed a lawsuit Tuesday in U.S. District Court against the U.S. Forest Service under the Clean Water Act's citizen enforcement provision. The area contains important salmon habitat that the company says it will restore if allowed to mine. The company is asking the federal court to hold the U.S. Forest Service responsible for the pollution at the mining area." (Keith Ridler / Associated Press)

Let's recap. Midas wants to mine, even though the DEIS clearly says for alternatives 1-4, it will be bad for the environment and detrimental to sensitive fish habitat. The USFS allowed Midas Gold to write the biological assessment document on the impact of its own mine, a job traditionally for the Forest Service or an independent contractor with no connections to the company in question (Bob Krusta, Idaho Statesman). Can anyone say conflict of interest? Midas has since filed a lawsuit against the USFS (not against the previous mining companies) over decreasing water quality in order to get permission to mine, while simultaneously admitting their project will be detrimental to water quality. What is going to stop Midas from leaving the mine waste seeping into the lives of everyone downstream, and cleanup at the expense of the US taxpayer, again? Perhaps Midas is right to file a lawsuit against the USFS, maybe the USFS should be responsible for allowing previous mining activities near sensitive fish habitat leading to ongoing mining pollution. Based on history alone, the US Forest Service should definitely not support additional mining operations in the project area.

It is deeply concerning that this Canadian based company doesn't have a single example of its professional capability to operate such a project on display for the public. Would you contract the work of a construction

company if the portfolio was empty, or the company had no mission? Midas Gold Corp is an exploration-state company, which is engaged in exploring and acquiring mining properties (Reuters.com). It doesn't sound to me like a company with a commitment to the environment, nor to the communities in which it operates.

Buyer beware, Midas is poised to walk away after its antiquated pursuit of profit at the expense of our public lands is over, leaving the situation and whatever else they don't feel like cleaning up, to the US taxpayer.

The Stibnite project area is finally healing from the scars of past mining activity, and the impacts of expanded mining activity by a barely recognizable company represents an unacceptable risk to this watershed, and the community of people whose livelihoods depend on it, and to Idaho's economy. The project area should be preserved in perpetuity and not sacrificed for short-term gain by some foreign quasi-entity, poised to exit when it's cost effective, just as previous companies did.

Jo Kemper