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Organization:

Title:

Comments: U.S. Forest Service, Payette National Forest

Attn: Linda Jackson, Payette Forest Supervisor

500 North Mission Street

McCall, ID 83638

Dear Ms. Jackson:

Thank you for the opportunity to comment on the Stibnite Gold Project DEIS public comment period.

I am the Community Education Manager for Midas Gold Idaho and have been working for Midas Gold and engaged in the Stibnite Gold Project since June of 2016. This letter was not drafted nor submitted on behalf of Midas Gold but rather from myself as a Valley County Resident and Idahoan.

As a second-generation Idahoan who was raised with a deep appreciation for responsible management of our natural resources it is very important to not only myself but to my family that this project be evaluated and approved in a timely manner. Not only am I an Idahoan but I am a geologist, enrolled tribal member, environmentalist, recreationalist, hunter, and fisherman within our great State. My husband and I were both born and raised here in Idaho and it is where we are raising our own family. As Valley County full time residents we have seen all components and opinions of this project and with this I urge you to evaluate based on the scientific facts and conditions rather than emotionally driven opposition. I also appreciate the time and effort that Midas has not only spent engaging with recreational groups but tribal entities throughout the evaluation and planning of the SGP.

Coming from someone who lives in the area, I can say full heartedly that local communities have been hoping for a solution to improve the quality of aquatic life and the overall environment surrounding the Stibnite Mining District for years. Now, we finally have the chance to fix the past mistakes of previous mining projects with the Stibnite Gold Project proposed by Midas Gold. This project would put environmental restoration front and center and leverage modern mining techniques to protect the local ecosystem in the future.

As I'm sure you're aware, the local environment surrounding the Stibnite Mining District has been suffering from legacy impacts of decades of mining, much of which happened before today's rigorous environmental standards were in place. As a result of a water retention dam failure at Blowout Creek, not only is there a massive amount of sediment in parts of the river downstream, but streams and creeks upstream have been drained, killing off once functional wetlands.

Midas Gold's plan for environmental restoration includes repairing this drainage and restoring the wetlands. The draft Environmental Impact Statement (EIS) released by the U.S. Forest Service even found that mitigation and restoration will address the impacts made by previous mining projects. In the statement, findings indicate that their mitigation plan offers a net gain of 346.5 wetland functional units, which represents a 40% increase to today's levels (Appendix D, Table 8-2).

This kind of environmental restoration and reclamation is long overdue, and Alternative 2 as examined by the draft EIS and outlined by Midas is the best plan to achieve these goals. Unlike Alternatives 3 and 4, both of which would result in a two-year delay of the operations, Alternative 2 would allow this work to begin right away. This area has waited long enough; we cannot afford to drag the process out longer. For similar reasons, Alternative 5-essentially doing nothing about the problems at Stibnite-is a non-starter.

I urge you to please approve Midas Gold Idaho's proposal for the Stibnite Gold Project as outlined in Alternative 2. The Stibnite Mining District has been in desperate need of environmental restoration for generations, and this project offers just the kind of private investment that it will take to achieve that. Midas Gold's proposed project will

help vastly improve water quality in the region, benefitting local wildlife. Stibnite has been a crucial part to not only our states economy but our nations history in providing critical minerals for war time efforts and national defense.

Today, there is 10.5 million tons of spent ore and unlined tailings from previous mining activity just sitting in Meadow Creek within the SODA. The more water that flows over this waste material, the more that these metals continue to leach into the surrounding surface and groundwater. As a result, the amount of arsenic and antimony in this part of the Salmon River vastly exceed levels that are considered acceptable for drinking water or aquatic life standards. This is not a pristine site, this is a brownfield site that has sat for many years continuing to degrade environmental conditions at Stibnite.

Midas Gold has been monitoring the water quality at the site for the past decade, sharing this data with both locals and state regulators. Midas Golds plan to mitigate the historical impacts of previous, unaffiliated mining projects would help improve water quality and support local aquatic life. Among many other investments, Midas Gold would clean up the roughly 10.5 million tons of historical tailings and waste rock located in the SODA, reprocessing roughly 3 million tons of tailings and properly storing them in a new, state-of-the-art tailings storage facility.

Midas will also relocate the 7.5 million tons of used ore underneath the tailings facility liner system-permanently separating it from interacting with water. These efforts to remove legacy materials will improve water quality, a finding reflected in your own agency's draft environmental impact statement. According to chapter 4, removing legacy tailings and waste improves water quality in Meadow Creek Valley (4.12 103-104).

When it comes to not only restoring water quality and the environment, but making sure both stay in optimal condition, Alternative 2 is the only option that should even be considered. Alternative 3, in comparison, would place the tailings storage facility in an untouched part of the Salmon River while Alternative 2 places it in an area that has already been impacted by mining. Moreover, the placement of this facility in Alternative 2 is safer from geological hazards and represents a smaller project footprint than Alternative 3. Geologic conditions for proper TSF location needs to have serious consideration, which is present in Alternative 2.

Please help support this much-needed investment in restoring the Stibnite Mining District and improving the local water quality. I urge you to approve Alternative 2 as examined by the draft environmental impact statement and proposed by Midas Gold.

Sincerely,

Hayley Rambur

Donnelly Idaho