

Data Submitted (UTC 11): 10/29/2020 3:19:56 AM

First name: Dan

Last name: Anderson

Organization:

Title:

Comments: RE: Midas Gold, Sibnite Gold Project DEIS Comments

Dear Linda Jackson

I appreciate and thank you for allowing me an opportunity to provide input on this sensitive and important project. I have no affiliation with the project, but as a property owner in both Boise and Stanley Idaho, have a keen interest on what occurs in my backyard and the economic growth of our great State and Nation. I compliment the US Forest Service (USFS) for conducting a thorough and functionally sound environmental analysis and disclosure of potential impacts. I have read, in part, the Draft Environmental Impact Statement (DEIS) for the Stibnite Gold Project (Project).

Coming from a mining and environmental background and having conducted a due diligence on the project in 2018 (for a non affiliated company), I fully understand the Project's plans and permitting process.

I support the Alternative 2 and believe it presents the best options for avoiding, minimizing, and mitigating environmental impacts and assures responsible mining and restoration efforts at the Project

I have the following comments, concerns, and suggestions for consideration in your approval of the Plan of Operations and Restoration.

Presented in bulleted form and in no particular order, importance, or reference to the DEIS:

- \*Provide assurances that Company Environmental Specialists are included every step of the Project engineering process,

- \*Provide assurances the Company Environmental Specialists have a final sign-off approval before any earthworks or other actions are implemented so as to assure full permit and POO compliance.

- \*Please assure "Dark Sky Compliance" type outdoor lighting fixtures on all permanent structures (including construction buildings),

- \*Please follow BLM or related guidance on building color selection so as to minimize adverse visual effects. As a rule, darker shades are always less visually obtrusive,

- \*Seed construction and exploration disturbances as soon as possible after the action. This holds true even if the disturbance will be used again in the future. This practice minimized invasive plant colonization,

- \*Please assure that monies are budgeted for on-going aggressive weed management through performance bonds or other permit obligations,

- \*Please provide adequate stormwater pollution prevention measures; including State and USFS oversight of SWPPP and implementation of corrective measures.

- \*Please assure adequate engineering due diligence on SWPPP corrective measures and Best Management Practices (BMP's),

- \*Please assure there is adequate short-term closure provisions for all aspects of the Project should it not complete the full mine life cycle (e.g. incomplete mining of the pits, building/backfilling waste rock and tailing facility, potential acid generation, heavy metal exposure, etc.),

- \*Understand that natural stream channels are in a state of dynamic equilibrium and that efforts to restoration stream channels must consider this in the engineering and design stages,

- \*Please assure engineering controls are built into the design and construction of stream channels that kind water on the surface without discharging into the substrate and backfilled waste rock. Likewise on tailing facilities. A similar restoration occurred at a mine on the Salmon Challis Forest where they used an 18-inch layer of

compacted clay (with an engineering spec) followed by placement of the restored stream channel and riparian components over the clay. This allows the riparian area to be at a dynamic equilibrium,

\*Please assure that conservative water balance calculations are used for all design features but especially for SWPPP, tailing facilities, any NPDES proposals, and any other on-site water structures. As experience as shown over and over again, 100-year storm event can and will occur less frequent than 100 years and can occur back to back to back. Please assure redundant water management structures are in place,

\*Often times SWPPP actions fail and quantities of non-compliant water have the potential of discharging. Please consider conducting benchtop risk analyses for all water systems and provide avoidance, minimization and mitigation options,

Thank you for considering these comments as part of the public record.

Best Regards,

Dan Anderson  
October 28, 2018