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Comments: I am a former career USFS geologist with 35 years of experience in managing minerals and geology resources and administering resource projects on National Forest System lands. I have work experiences at the District, Forest, and Washington Office levels across Regions 1, 6, 9 and the WO. For several years, I worked closely with USFS International Forestry on requests for Agency support of mining related issues and projects in Venezuela, Georgia and Armenia. During my career, I was on an Executive Loan assignment to the State of Oregon, Economic Development Department working with the State and their international partners in the Asia-Pacific region, to establish a sustainable development training and information network. I write to offer my support of the Forest Service analysis and environmental review of the proposed Plan of Operation for the Stibnite Gold Project by Midas Gold Idaho (Midas). Please accept and consider my comments below on the Draft Environmental Impact Statement (DEIS).

To begin with, please accept my complements on the work your staff and contractors have done to prepare a comprehensive review of the project, development of good alternatives and an impressive effects analysis. While quite voluminous, I believe the DEIS more than meets the requirements of taking a [ldquo]hard look[rdquo] as required under the National Environmental Policy Act (NEPA). My opinion is that Alternative 2 meets the purpose and need of the project while at the same time, does a great job of responding to the issues with a host of useful (and substantial) mitigation and a solid range of alternatives. My impression from the online records is that the project analysis has had quite a few delays and the timelines are well behind schedules agreed upon between the USFS and the project proponent. I encourage you to complete the NEPA approval and then make the decision to approve the Plan of Operation consistent with Alternative 2.

The Stibnite site is typical of many legacy mine sites across the Western US, in that it was operated at a time before any meaningful modern mining practices were in use, activities predated the USFS locatable mineral regulations (36CFR228A) and moreover, when there were little if any environmental protection measures built into the mine design and/or implemented. Like many of the NFS lands impacted by past legacy mining remnants, I would like to see this area returned to productive post-mining uses. It seems to me that Midas and their proposed Stibnite Gold Project have the necessary resources and commitment to make that happen. My experience provides me an insider[rsquo]s perspective on abandoned mined lands (AML) and cleanup activities on National Forest System lands. As you know, ongoing and adequate funding for AML sites has always been problematic and very challenging for the USFS, especially at sites like Stibnite where the damage was done generations ago. Like other [ldquo]war-time[rdquo] mine sites, my understanding is that at Stibnite the Federal government itself was instrumental in discovery, development and mining of the site[rsquo]s antimony and tungsten ores and, as was common, production of the metals to supply U.S. and our allies[rsquo] war time needs took precedence. This is a repeating theme at several Western mine sites that contain very important mineral deposits the Nation needed (and needs) for many essential purposes.

The Stibnite deposit provides a domestic source of antimony for U.S. manufacturing and national defense needs. The current U.S. Geological Survey list of Critical Minerals includes antimony which is a mineral the US is dependent on from sources outside our Country (USGS, 2018). Domestic production is essential to offset this imbalance between our demand and the current supply. Antimony is used in flame retardants, batteries, electronics and munitions. Trade wars currently underway between the US and other Countries make this site even more important. Redevelopment of the mines at Stibnite, done responsibly, is in the national interest. It appears Midas has really focused on including the production of minerals from the re-mining and reclaiming of the site as they proceed through their mine plan. The project stands out to me as not only a domestic source of gold but also antimony, a critical mineral, which will be produced through modern mining practices; however Midas has also built their plans around solving very difficult and expensive environmental issues associated with

the legacy of the site. The project offers both protection of the environment from proposed activities, and also very attractive environmental benefits from remediation of historic impacts that the current USFS AML funding system and existing technical workforce, could never accomplish.

It appears from the record the East Fork of the South Fork of the Salmon River (EFSFSR) was originally diverted so that antimony, tungsten, and gold could be mined from the Yellow Pine Pit. Once mining activity stopped over 65 years ago, the EFSFSR was simply directed to flow into the former pit. As a result, anadromous and resident fish populations have been blocked from miles of their historical spawning grounds for decades. Despite the length of time and numerous fish passage restoration efforts both regionally and locally, restoration of fish passage at this scale is well beyond typical USFS restoration projects and needs outside capital to get completed - otherwise it would already be done. It is not simply fixing a couple of culverts and bioengineering of stream banks, but it appears to need a massive earth moving operation that demands the expertise of technical people who are very experienced in engineering at the large landscape scale and re-engineering the site hydrology. The USFS workforce does not seem presently able to address these technical needs, let alone find a sufficient and sustainable funding mechanism. Annual AML project money is woefully inadequate. A smarter choice would be to encourage this through approval of the Plan of Operation, because the alternative of having a stand-alone, successful and cost effective USFS or EPA led CERCLA effort (which has been attempted at so many other legacy sites) funded fully at taxpayer expense is not realistic. It is time for a new way [ndash] take advantage of the opportunity for new, modern development at legacy sites through innovative design steering toward the long term desired future conditions of the site.

The online documents appear to indicate that Midas designed the Stibnite Project to include the restoration of fish passage and connect areas with the historic high-water spawning grounds. That type of [ldquo]big-picture[rdquo] thinking with a view toward the long term is impressive, and Midas should be considered an extremely valuable member of your [ldquo]public/private[rdquo] team. With regard to the mine plans, it appears pit backfilling at the Yellow Pine Pit, and removal of fish passage barriers is another positive step forward for fish passage and habitat restoration. Backfilling of crucial areas of the site are an important aspect of the proposed Plan that should receive more attention. For example, it seems that a major difference between Alternatives 1 and 2 is that Midas would partially backfill the Hanger Flat Pit. If it is reasonable and doable, could the Hanger Flat Pit be [ldquo]fully[rdquo] backfilled? Is there an environmental benefit of doing so?

Extensive baseline data collection, feasibility studies, risk assessments and high quality internal and external input to a large and complex project like this is crucial to limiting the [ldquo]uncertainty[rdquo] that comes with all long term industrial projects. To aid in reducing [ldquo]risk[rdquo] to the taxpayers of long term site monitoring, unmet reclamation needs or care and maintenance of long term water treatment facilities, the USFS has, over the years, [ldquo]beefed[rdquo] up reclamation bonding practices. The certification of locatable mineral administrators, reclamation bond training, and a national bonding guidebook have all been implemented to try to build and maintain a robust and qualified workforce to handle the technical complexity of these large locatable mineral projects. In addition, the USFS financial assurance procedures have changed over time and developed from lessons learned in the field. In my opinion, a properly managed and implemented operation, administered through the 36CFR228A regulations, can result in an environmentally responsible mine that will not result in the kind of unmitigated environmental impacts like those of the past. The one large, caveat is that the USFS must do an excellent job of field administration and maintain an effective quality assurance/quality control system on site. There is absolutely no [ldquo]well designed[rdquo] mine plan that can be carried out successfully, if the USFS fails to provide responsible, well trained and qualified field level administration and monitoring of approved projects. That responsibility sits squarely on the shoulders of the USFS.

The company[rsquo]s proposed Plans of both operation and reclamation contain excellent discussions of the design criteria and best available technology they utilized to develop the various sections of their proposal for siting and development of an appropriate tailings storage facility, access roads, and other associated ancillary infrastructure (Appendix G). These indicate they took the 36CFR228A regulations to heart and tried to develop a

plan to minimize impacts to surface resources wherever reasonably possible. This should be considered and documented in your decision making.

Please take my comments into consideration and approve the plan for the Stibnite Gold Project as presented in Alternative 2. The Record of Decision should clearly state that certain on the ground changes will, no doubt, be necessary based on field conditions at the time of construction and development. Please do your best to avoid the very common trap of having to re-start a new NEPA process or supplemental NEPA amendments because of routine field level changes necessitated by site conditions discovered during the initial phase of Plan implementation. Some level of [ldquo]adaptive[rdquo] management should be discussed in the ROD so that the public is not under the impression that every field level change within the project site triggers a new NEPA evaluation or decision. Your field mineral administrator should have the necessary experience and qualifications to take the approved NEPA documents, the approved Plan of Operation including the performance standards, an inspection checklist, along with your full support and move forward into a successful implementation phase.