

October 14, 2020

U.S. Forest Service, Payette National Forest
Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Dear Supervisor Linda Jackson:

I would like to submit these comments in support of the Stibnite Gold Project proposed in Alternative 2 of Midas Gold's plan.

For 40 years, I have had the privilege of working with the Forest Service on natural resource issues, including mining. For 12 of those years, I worked in a House and then Senate Congressional office in Lewiston. My District included the Nez Perce and Clearwater National Forests. For the past 28 years, I have worked as an advocate for recreation in all of Idaho's National Forests. In all these years, I have never seen a company put as much effort into working with the communities, the users of those lands, and into protecting and restoring the environment. Midas has raised the bar for all potential mining companies! I believe that this project will benefit the land, the rural communities and the people who live, work, and play in the area.

Midas Gold's plans for access routes reflect the high degree of safety for residents, employees, and the environment that the company has taken into consideration. Knowing that accessing the backwoods and backcountry around the site is critically important for many Idahoans, the company has done its due diligence to ensure access routes are not only as safe as possible, but that they reflect the needs of local community members and seasonal visitors to the region.

In particular, Midas Gold has been extremely cooperative with the local snowmobile community and other over-snow vehicle (OSV) recreation groups to minimize the impact of this project by coming up with alternative access roads that still allow for Idahoans to access the backcountry surrounding the Stibnite Mining District. Recognizing that the area around the mine site has become a popular destination for snowmobilers and other recreationalists, Midas Gold Idaho has been extremely collaborative in their approach for planning access roads through and around the site to accommodate these needs.

Originally, Midas Gold's plan did not provide public access through the Stibnite site to Thunder Mountain due to safety concerns. However, after soliciting feedback from the public and local communities, and hearing how important it was for recreationalists to be able to maintain access to the mountain, the company worked collaboratively with us to find a solution that still prioritized safety, but allowed for local access to Thunder Mountain. As a result, Midas Gold has proposed maintaining seasonal access to Thunder Mountain through the Stibnite site by routing traffic on a road near the upper portions of the Yellow Pine Pit, keeping the level of access similar to what it is today.

As part of their plan under Alternative 2, Midas Gold intends to plow Warm Lake Road between Landmark and the Burntlog Route into Stibnite throughout the winter to maintain access to the site. However, plowing of this road will impact current routes for snowmobilers and other OSV enthusiasts, who typically flock to the region during the winter.

Recognizing this, Midas Gold has been working with local snowmobiling organizations to maintain a route between Warm Lake and Landmark. A new route will follow Cabin Creek Road until it intersects with Johnson Creek Road at Trout Creek Campground. Midas Gold is even going to put in a snowmobile parking lot at the intersection to facilitate access to the surrounding region for recreationalists.

Compared to the access routes proposed in Alternative 4, the solutions outlined in Alternative 2 provide a higher degree of safety while also enabling greater access. According to chapter 4 of the Draft Environmental Impact Statement (DEIS) released by the U.S. Forest Service, the Yellow Pine Route proposed by Alternative 4 has “more geotechnical hazards associated with landslides, and rockfalls (45 total) compared to the Burntlog Route (26 total). There are two avalanche paths mapped for the Burntlog Route versus 12 mapped avalanche paths for the Yellow Pine Route.”

Midas Gold has also made clear efforts to reduce the footprint of the Stibnite Gold Project in Alternative 2. Initially, as seen in Alternative 1, the company did not plan to backfill the Hanger Flats pit. Under Alternative 2 Midas Gold will partially backfill Hanger Flats. This will make a substantial difference to site. I commend Midas Gold for these efforts but wonder if in the final EIS, Hanger Flats pit could be completely backfilled.

After a decade of conducting scientific analysis and working with multiple local, state, and federal regulatory bodies and agencies, Midas Gold has put together a comprehensive plan to restore the environment surrounding the Stibnite mine in a way that works for local residents, communities, and recreationalists that love this area. Even the U.S. Forest Service’s own DEIS has found that the mitigation and restoration plans outlined in Alternative 2 would greatly benefit local fish populations, improve water quality, and ensure ongoing safety and environmental protection.

For all these reasons, I ask that you accept Alternative 2 and help ensure this vital project moves forward.

Sincerely,

Sandra Mitchell