

Date submitted (Mountain Standard Time): 10/28/2020 11:05:55 PM

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Comments:

I am writing in objection to Midas Gold's Stibnite GOLD Project. This project is on public lands and I do NOT believe the project is in the best interests of the public, U.S. Government or even a U.S. company in the short or long term.

Gold is not in short supply and the U.S. has been a net exporter for the last 24 years. It's almost certain that any gold mined from Stibnite would be shipped overseas. The only product from this mine that may hold strategic value to the U.S., antimony, is unlikely to be realized as demand is currently low and many of the existing U.S. mining operations could produce quantities in significant amounts to satisfy national demand. With no processing facilities currently in operation or planned in the near future any antimony would be shipped across the Pacific to other companies and at best sold back to the U.S.

While Midas claims they will clean up the existing heavily polluted mine sites which make up less than half the area of the proposed Stibnite mine boundaries what measures are in place to ensure that at the end of Midas operations the mine they won't leave a bigger mess over an even larger area, much of which is currently undisturbed habitat. Midas claims to incorporate a mitigation plan in accordance with the Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment (November 2015)- they do not provide detailed clarity on what that would look like, as far as what "modern" mining techniques they are using that would produce different outcomes from the past mines in the region, or ways that they would "avoid or minimize harm" - and minimize relative to what? This is a very large proposed mine and while Midas can say that they are working with guidance from the Presidential Memorandum, the memorandum itself is very vague and leaves room for a great deal of environmental destruction.

Aside from the direct impacts of open pit mining, it is unclear the number of miles of new road to be constructed. While there is some explanation of roads that will be maintained during initial construction and then connected, it is not clear how much roadless area will be permanently changed. This is a pristine wilderness area and any new roads dramatically alter wildlife habitat and the pristine nature of the wilderness. How will road development break up contiguous pieces of animal habitat? How will noise/construction and road traffic impact wildlife in the area? What is the plan for the roads after construction? After the mine is closed? Will the roads be decommissioned and reclamation work done in these corridors as well?

Along with the roads a surface water treatment plant that will surely be required at the site well beyond the 12 years of active mining. This will require either onsite diesel generation or high voltage powerlines be run to the mine, both options have severe local environmental impacts. Midas's claims to "including solar power" are ridiculous as a solar farm large enough to produce power sufficient for an operation this large is cost prohibitive in and of itself. Who will fund the long-term operation and maintenance costs to keep these plants running?

The "Socioeconomic & Workforce" plan leaves plenty of wiggle room for hiring and contracting outside of the local region. Mining companies have a long history of providing low paying menial jobs to the local workforce, while filling the higher paying positions with non-local, already training personnel.

Finally, a plan this long and dense serves as a deterrent to allow the public to actually meaningfully engage in the comment process. Further, the document lacks many of the technical details necessary in the actual operationalization of the mining activity to determine the level of risk to the surrounding region.

Again, I want to emphasize I do NOT support the Stibnite mine under Midas's current proposal or at all for that matter.