

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

Dear Ms. Jackson;

I would like to submit a comment letter for the Midas Gold's Stibnite project located near Yellow Pine, Idaho. I am strongly supportive of the proposed project and specifically Alternative 2. I worked in the Thunder Mountain area to the east of Stibnite and know first-hand that the area is a mess due to poor past practices – both in mining and forestry. Midas Gold's proposed mine development will result in a vastly improved environment, high quality jobs for people, tax revenues for local, State and Federal governments and the production of metals needed by this country – while gold underpins the value of our currency (the US has the largest gold reserve of any country and is a large factor in why the \$US dollar remains the world reserve currency), perhaps more importantly, antimony is a critical metal that we current rely mostly on China for - not a comforting thought given our current poor relations with that country due to a myriad of issue from unfair trade practices to a seemingly uncaring government that did not give fair warning to the world about the impending pandemic resulting form the spread of the coronavirus.

There are four main areas I want to address in this letter of support: Protecting the Environment and People; Job creation; Critical Metals and Environmental Process.

#### Protecting the Environment and People

The Project offers a unique opportunity to restore legacy impacts left behind from mining activity decades ago and brings restoration to the forefront of modern day, responsible, mining. The Project will: improve water quality by reprocessing and safely storing millions of tons of historical tailings; restore fish migration to spawning grounds where access has been blocked for over 80 years; restore the East Fork of the South Fork of the Salmon River to flow naturally and support fish passage after decades of pouring into an abandoned mining pit; exceed reclamation standards required by law with design that restores and creates dynamic ecosystems that are sustainable and long-term; be fully bonded to ensure restoration occurs.

Midas Gold's tailings storage facility (TSF) is designed to meet or exceed the most stringent design factor-of-safety set forth in Idaho regulations. After several possible TSF locations were considered, Midas Gold proposed a site that is 90% constrained by mountains. The remaining 10% will be retained by a dam with a factor of safety exceeding 1.5 and further buttressed by an additional 65 million tons of development rock that brings the factor of safety to over 3. At all times during the life of the mine, the TSF will maintain enough volume to contain at least six to seven times a 500-year flood volume. Prior to tailings being pumped into the TSF, all chemicals of concern will be removed or neutralized to well below the levels considered safe for wildlife.

The Burntlog Route, incorporates existing Forest Service roads, keeps traffic away from fish-bearing waterways, avoids known avalanche sites, reduces environmental risk and keeps sediment out of the waterways. Modifications in Alternative 2 further reduce wetland impacts and shorten the route by over one mile. Midas Gold's work schedule and traffic plan minimizes travel trips to increase safety and reduce greenhouse gases emissions. Additional design refinements reflected in Alternative 2 reduce traffic by more than 20%. Proposed through-site public access maintains current accessibility to Thunder Mountain while prioritizing safety.

Restoring the East Fork of the South Fork of the Salmon River is at the core of the project design and provides a pathway for anadromous fish to reach historical spawning grounds within the first year of operations. To protect fish & wildlife the Project will:

1. Minimize disturbance to wildlife habitat by utilizing previously disturbed areas as much as possible for their operations - 43% of the project footprint in Alternative 2 is on previously disturbed land;
2. Utilize responsible night lighting to mitigate light pollution and minimize noise where possible;
3. Install a wildlife exclusion fence around the tailings storage facility, process facility areas and related process ponds to reduce potential risk to wildlife;
4. Undertake reforestation and fish habitat enhancement across the site, not just project-impacted areas, in order to improve the overall quantity and quality of wildlife habitat.

### Job Creation

The project will create over 500 well paying local jobs with an initial investment of over \$1 Billion into the region. Mining related jobs are high quality jobs, not minimum wage jobs – these are jobs you can raise a family on, and mining families are always strong supporters of local communities. Heaven knows with the downturn in the economy caused by the pandemic we need new jobs and good paying jobs even more!

Midas Gold has committed to hiring, contracting, and purchasing supplies and services locally whenever possible. To date, Midas Gold has spent over \$69 million in Idaho by prioritizing local vendors and contractors. Midas Gold will support training opportunities for Idahoans throughout the life of its project by working directly with schools, community colleges and the Idaho Department of Labor.

During construction, the Project would directly employ 600 to 700 people with annual payroll ranging from \$42 million to \$49 million. During operations, Midas Gold anticipates providing ~500-600 direct jobs for the community with an annual payroll ranging from \$48 million to \$51 million. Jobs during operations include management, administration, equipment operators, general laborers, mechanics, electricians, engineers, surveyors, geologists and environmental and safety specialists.

Again, these are highly skilled and well-paying jobs. According to a study conducted in 2017, compensation on the Stibnite Gold Project would average approximately \$80,000 a year based on comparable operations in Idaho, as compared to \$35,000 in the area surrounding the project currently.

Not only are there jobs as a direct result of the investment by Midas Gold, but there are many more indirect jobs generated from the economic activity of the proposed mine. Independent estimates suggest indirect employment of ~500-800 people during construction and ~450-600 people during operations including personnel involved in the supply chain for consumables used at site, for transportation, for increased needs in local communities (e.g. teachers in schools, hospitality and commercial staff to meet increased demand, etc.) and other areas. When there is economic activity it generates more economic activity – usually by a multiple of 3 – those +500 workers at the mine buy groceries, gas and lattes....and pay taxes!

### Critical Metals

As already mentioned, antimony is recognized by the United States Government as a critical metal currently not produced in this country - and that must change! If we are going to seriously address Climate Change, we must modernize our power generation and transportation system and move away from carbon burning fuels and the internal combustion engine. Antimony is a metal that has extensive uses in modern society as well as many military uses that protect our country and our freedom.

The use of antimony as a fire retardant and in steel hardening during World War II is credited for saving as many as a million American lives and shortening the war by a year. The military relies heavily on antimony. It is used in high tech electronics such as night

vision goggles, communications equipment, infrared sensors, explosives formulations, and ammunition primers. It is used in hardening lead in bullets and shrapnel, in armor piercing projectiles, and in nuclear weapons and nuclear power plants on submarines and warships.

Antimony has many high-tech applications. It helps remove impurities in glass and is important in the production of military binoculars, precision optics and laser sighting and survey equipment. Because of its hardening properties and protection against corrosion, antimony is heavily used in battery production, nuclear energy, wind turbines and marine ship building. Without antimony, the metals needed for these industries would be less resilient and more susceptible to failure.

Antimony's natural flame-retardant properties make it important in the paint and coating industries, where antimony is added to increase fire protection, and extensively used in plastics for its flame-retardant properties. Antimony helps to make glass clear and doesn't impact the color of it, so it has become key in the solar industry as well as the production of cell phone and computer screens. Antimony is under intense study because of its unique physical properties. It is being investigated for its potential uses in lithium ion batteries, infrared photodetection, semiconductors, LED lighting, fuel cells and other advanced technologies.

Why rely on an unreliable country like China to supply us with antimony when we can do that here in this country, under laws that protect environment. Furthermore, by producing gold we continue to produce a metal that is a foundation of a strong economy!

### Environmental Process

The National Environmental Policy Act (NEPA) is intended to ensure all projects meet federal and state standards for environmental protection and safety and requires a lengthy and exhaustive review. The Project has undergone 4+ years of technical review by regulators, experts and stakeholders. Eleven local, state and federal agencies have reviewed and analyzed the Project to develop the draft Environmental Impact statement (DEIS). Midas Gold has been transparent and is working diligently to inform the public and incorporate stakeholder input into the Project.

After years of regulatory review, Midas Gold proposed refinements to the original Plan of Restoration and Operations (PRO) addressing direct feedback from Idahoans,

reducing impacts on the environment and improving upon the design of the Project. This plan, the “Modified PRO” (Mod PRO) is now reflected in Alternative 2 of the draft Environmental Impact Statement (DEIS). Refinements include:

1. Removing a development rock storage facility and reducing new project disturbance by 72 acres (PRO Section 9.3 and 14.2.9);
2. Backfilling the Midnight mine pit and partially backfilling the Hangar Flats mine pit to reduce pit lake depth by 460 feet;
3. Adding geosynthetic covers to development rock storage facilities to protect water quality;
4. Surface water management modifications to maintain surface water flows, reduce stream temperature and improve surface water and groundwater quality;
5. Moving the road maintenance facility location to the Burntlog Route to protect the historic nature of Landmark;
6. Rerouting sections of the powerline to reduce wetland impacts and address private landowner concerns;
7. Modifying the Burntlog Route to reduce the road by over 1 mile and substantially reduce wetland impacts;
8. Reduction in overall tra\_c by more than 20% and related emissions by producing lime on site;
9. Maintaining safe, seasonal recreational access through the mine site.

In addition, adequate financial assurance is provided to ensure that any potential impacts can be appropriately dealt with over the long term reclamation plan. Recent changes in the law now require Midas Gold set aside funding for reclamation calculated based on the actual cost of reclamation and closure. The calculation considers reclamation costs conducted by third parties with government oversight, addresses long-term water treatment and even includes an extra percentage for contingency. The calculation will be reviewed and updated every 1 to 5 years to ensure accuracy. Midas Gold has suggested that financial assurance for the Project incorporate restoration standards and where possible, going beyond reclamation standards. Midas Gold will not use “Corporate Guarantees” but will secure traditional funding mechanisms such as bonding and trusts.

Furthermore Midas Gold adopted a formal community agreement with eight of the communities closest to the project site. This will ensure that local residents will have their concerns addressed and that their voices will be heard. Through the agreement (which was signed by Adams County, Cascade, Council, Donnelly, Idaho County, New Meadows, Riggins and Yellow Pine), Midas Gold is legally committed to hosting a regular forum for the exchange of information and addressing concerns with local communities

during permitting and throughout the life of the project - see [www.stibniteadvisorycouncil.com](http://www.stibniteadvisorycouncil.com)

As part of the community agreement, Midas Gold created the Stibnite Foundation. The independently run foundation is a mechanism to empower communities to fund projects that meet the needs of their citizens and support initiatives that support shared community values. Initial contributions have been made to the Foundation, and the Foundation anticipates launching its granting process in 2020 – see [www.stibnitefoundation.com](http://www.stibnitefoundation.com).

### Summary

If we are going to be successful at cleaning up a heavily disturbed historic mining site, we will need a plan. Midas Gold has put forward a plan that demonstrates that reclaiming these historically impacted areas will replant extensively reduced forest cover, restore stream channels, wetlands and fisheries, and creating a sustainable ecosystem. The plan will create hundreds of good paying jobs – jobs that are much needed as we dig our way out of the pandemic induced economic recession. Metals like antimony and gold that are critical to a strong economy and our modern way of life, including those needed to address Climate Change, will be produced in this country that has enforceable laws and strict regulations that will ensure the environment and people are protected in the process. This project must be allowed to proceed!

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Van Nieuwenhuyse". The signature is fluid and cursive, with a large initial "R" and "V".

Rick Van Nieuwenhuyse

Fairbanks, Alaska