



September 22, 2020

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

Dear Ms. Jackson:

On behalf of the Idaho Associated General Contractors (AGC) and our more than 600 member companies statewide, thank you for the opportunity to comment on the open docket regarding Midas Gold's proposal to redevelop and restore the Stibnite Mining District. It is our belief as an organization that this project as outlined in Alternative 2 of Midas Gold's proposal would provide immense benefits to Idaho's workers and the state's overall economy. I ask that you please approve Alternative 2 without further delay.

The Idaho AGC has members in each of Idaho's 44 counties. Together, they help build the places where everyday Idahoans work, shop, worship, receive medical care, attend school, and much more — as well as the infrastructure and utilities that connects it all. The construction and contracting industry plays a vital role in the health of Idaho's economy, but like many industries, the economic downturn caused by the COVID-19 pandemic has affected us as projects statewide are delayed or canceled. We believe the Stibnite Gold Project offers a valuable opportunity to reignite economic opportunities for general contractors, construction workers, and engineers across the state—as well as for a whole host of other professions outside our industry.

Throughout the lifetime of this proposed project, Midas Gold has committed to hiring, contracting with, and purchasing supplies and services from Idaho-based vendors whenever possible. In fact, the company has already spent nearly \$80 million right here in Idaho by working with local vendors and contractors. Seeing this project through to its completion will create a supply chain of Idaho-based companies, strengthening the economic outlook for dozens or hundreds of local businesses, and providing new opportunities for growth while supporting a stronger, more stable workforce.

Based on preliminary projections from Midas Gold, the construction phase of the Stibnite Gold Project alone would directly employ up to 700 people, with an annual payroll that could reach up to \$49 million. This construction would provide numerous benefits for local contractors, laborers, engineers, and other construction professionals. And these are just the jobs that Midas Gold as a company would directly create. Indirectly, the construction phase would support another 500-800 jobs.

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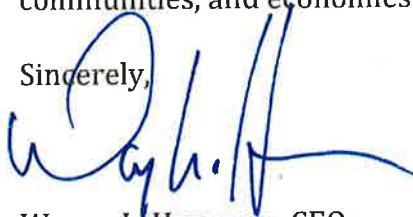
According to an economic impact analysis, the project would cost a total of approximately \$1.1 billion to build and roughly \$230 million each year to operate, contributing significant local and state tax revenue and injecting hundreds of millions of dollars into the larger economy.

After reviewing the Draft Environmental Impact Statement released by the U.S. Forest Service, it appears that even your own agency agrees about this project's economic potential. According to chapter 4 of the DEIS, the long-term productivity of the Stibnite Gold Project area would be an economic benefit to Idaho. Another section in Chapter 4 found that mine construction and ongoing operations could help support the viability of local communities and offset potential adverse climate change impacts.

Out of all the options that have been presented and that were explored by the DEIS, Alternative 2 is far and away the most effective solution that will yield the largest economic benefit for Idahoans the soonest. Another finding of the DEIS in chapter 2 shows that, if Alternative 4 were selected, the overall construction time frame would need to be extended by at least another 2 years, delaying the economic benefits of this project when we need them now. Moreover, Alternative 5 would mean continued inaction at the site, essentially preventing Idaho from ever seeing any economic benefits whatsoever.

For the sake of local jobs in the construction industry and across a range of economic sectors – as well as a stronger Idaho economy in general – We ask that you please approve Alternative 2 of Midas Gold's plan for the Stibnite Gold Project as soon as possible. The 60-day comment period should provide more than ample time to hear from all sides of this issue. The sooner this project gets off the ground, the better off Idaho workers, communities, and economies will be.

Sincerely,



Wayne L. Hammon, CEO
Idaho Associated General Contractors