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Submitted Electronically To:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=50516>

October 12, 2020

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

**RE: Comments on the Payette and Boise National Forests’ Draft Environmental Impact Statement for the Stibnite Gold Project**

Dear Ms. Jackson:

Introduction

The Nevada Mining Association (NVMA) appreciates this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) that the Payette and Boise National Forests (Forest Service) have prepared on Midas Gold Idaho Inc.’s (Midas Gold’s) proposed Stibnite Gold Project (SGP). NvMA and its members are interested in this project because it integrates environmental restoration of a legacy mine site with the development of a new mine that will protect the environment and extract gold and the critical mineral antimony. We understand that the Forest Service, the Idaho Department of Lands (IDL), and Midas Gold will use the Standard Reclamation Cost Estimator (SRCE) to calculate the financial assurance requirements for the project. The SRCE is a state-of-the-art mine closure and reclamation cost estimation system developed in Nevada and successfully used for decades.

For background, the Nevada Mining Association (NVMA) was first organized in 1913 and consists of more than 500 companies that comprise Nevada’s mining industry and rely, in whole or in part, on this state’s foundational industry. These member companies are engaged across the broad spectrum of the industry in Nevada, from exploration and discovery, to development and construction, to operation and production, to closure and reclamation. NvMA provides a voice for Nevada’s mining industry in federal, state, and local policy matters, community engagement, public education, and workforce development.

Integrating Environmental Restoration with New Mining

NVMA applauds the Forest Service and Midas Gold for working together on this innovative project proposal to use private-sector resources to address the public land natural resource issues that currently exists at this project. The substantial fiscal resources that the Company is proposing to invest to restore and redevelop the Stibnite mine site is a win-win for both the public and the environment.



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Midas Gold’s plan will eliminate a major source of the arsenic and antimony contamination that is currently impacting the watershed. The proposed removal of 10 million tons of legacy mine waste produced in the 1940s-1950s, when the federal government helped explore and mine for tungsten and antimony to supply the military during World War II and the Korean War, will reap substantial and lasting environmental benefits.

NVMA commends Midas Gold for its proposal to restore access to salmon spawning grounds by building a temporary fish passage tunnel around the Yellow Pine Pit, which is currently a barrier to upstream fish migration. Midas Gold’s proposal to backfill the Yellow Pine Pit and restore the natural drainage once mining is completed will provide enduring environmental benefits to the fishery, wildlife, and riparian habitat.

Besides addressing the environmental problems at the site and providing several hundred well-paying jobs during the life of the project, the SGP would also become the nation’s only producing mine for the critical mineral, antimony. Development of the mine would help reduce the country’s reliance on China for this important mineral consistent with the directives in President Trump’s September 30, 2020 Executive Order, “Addressing the Threat to the Domestic Supply Chain from Reliance on Critical Minerals from Foreign Adversaries.”

Although the restoration activities that Midas Gold is proposing for the SGP have been designed to address the site-specific conditions at the SGP, the site could serve as a model for legacy mining sites in Nevada and other western states where unregulated and antiquated mining practices created environmental problems.

#### Financial Assurance

Nevada’s development of the SRCE and its decades of experience refining the model has resulted in a strong partnership among the Nevada Division of Environmental Protection (NDEP), Bureau of Land Management (BLM), the U.S. Forest Service (USFS) in using the SRCE to calculate Reclamation Cost Estimates (RCE) for a wide array of Nevada projects ranging from exploration to large gold and copper mines. Importantly, the exploration and mining industries also recognize the SRCE as an important tool in ensuring reclamation and a productive post-mining land use. In Nevada alone, the state and federal agencies jointly co-manage over \$3.1 billion in financial instruments for mining reclamation.

NVMA is confident that the SRCE-calculated RCE for the SGP will provide the Forest Service and IDL with comprehensive and conservative financial assurance values.



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Conclusion

NVMA appreciates this opportunity to provide comments on the DEIS and supports USFS approval of the project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tyre L. Gray". The signature is fluid and cursive, with the first name being the most prominent.

Tyre L. Gray, Esq., President  
Nevada Mining Association