



Comments of the Regulatory Action Center

Re: Stibnite Gold Project

Docket ID: EIS #50516

October 23, 2020

The Regulatory Action Center at FreedomWorks Foundation is dedicated to educating Americans about the impact of government regulations on economic prosperity and individual liberty. FreedomWorks Foundation is committed to lowering the barrier between millions of FreedomWorks citizen activists and the rule-making process of government bureaus to which they are entitled to contribute.

On behalf of over 5.7 million activists nationwide, FreedomWorks Foundation appreciates the opportunity to offer these comments to the Forest Service (USFS) regarding the notice and request for comments on the draft environmental impact statement (EIS) for the Stibnite Gold Project (EIS #50516). This notice seeks to advance and develop the final plan for this important project.

Among both FreedomWorks and the Regulatory Action Center's primary goals is to foster innovation, advance market-based solutions, and reduce unnecessary barriers to economic development. We are pleased that the USFS is looking to take a crucial next step towards advancing a project years in the making that will bring economic development to the state, needed jobs to surrounding communities, and initiate critical environmental cleanup plans. It will also surely have wide-ranging benefits for consumers across the United States.

We encourage USFS not to let specious environmentalist concerns hinder the development of the Stibnite Gold Project. Contrary to their claims, the project will actually have a number of environmental benefits. Midas Gold's submitted plans include vast economic *and* environmental considerations. They plan to use state of the art equipment and environmental practices to safeguard the integrity of the land. The Stibnite Project will also include a restoration of the degradation that has been left by previous mining projects that did not take the time or care that this one has.

Midas has promised time and again to remove tailings that are contaminating the nearby Meadow Creek drainage. Beyond that, they are actively seeking to address the shameful deforestation that occurred as a result of previous legacy mining projects on the same land. They have promised to cooperate with USFS to plant seedlings and other plant life and even to monitor their growth after the fact.

Midas has also promised to foster habitat creation for fish that have been adversely impacted by the prior legacy projects. Their path upstream has been blocked. The Stibnite



Project will not only help existing wildlife, but create better conditions for future ones as well. This is the type of spirit we should be encouraging, especially when mining is being largely criticized for its environmental impacts. Projects like these represent the future, a brighter future.

Wildlife is not the only local community that will reap the benefits of the Stibnite Gold Project. With Midas' commitment to local communities, cities, and counties will be able to address any and all concerns they might have more directly than ever before. It also promises to bring thousands of jobs to the area. While this is always a crucial benefit, it is perhaps more important now during the coronavirus pandemic. We are not in a position to stymie anything that can contribute to economic recovery and put people back into firm, well-paying jobs.

This particular region of Idaho is known in particular for its vast deposits of gold, silver, tungsten, and antimony. Each has its own benefits and will surely improve life across the nation, as well as benefit the American economy.

Gold mining is a crucial source of economic growth in the United States and the world, and has been for some time. As recently as 2013, gold mining companies contributed over \$171 billion to the global economy. Despite this, the United States' domestic gold production has continued on the sharp downward trajectory that began at the turn of the new millennium, going from roughly 350 metric tons produced in the year 2000, down to around 230 metric tons by most recent estimates. This is over a one-third decrease. The U.S. is doing itself a vast disservice by not tapping into this *literal* gold mine and fast tracking projects like Stibnite.

Silver is also a critical resource that will provide added benefits beyond the Northwest Idaho area. Silver has many industrial uses, especially as it relates to medical equipment, water purification, and solar energy. Without it, our ability to protect against bacteria in hospitals would be diminished. Once again, against the backdrop of COVID-19, this is an important consideration. Silver helps harvest more energy from the sun in solar technology and is crucial in helping Americans access clean water. These are some of the incidental environmental benefits from this project.

Tungsten is a particularly exceptional metal. It has the highest melting point of all metals (in their purest form). This particular resistance to high temperatures has a wide range of practical applications from sports, to infrastructure, to transportation, as far as national defense applications. Because of its structure and density, it is also particularly resistant to corrosion or other wear and tear that might be experienced by more common metals.

Lastly, antimony is a resource to which the U.S. does not currently have reliable domestic access. We currently rely on China for the access that we do have. According to estimates, this project could, by itself, supply one-quarter of the domestic demand for antimony. There is a



reason antimony is in demand and why it is crucial for the U.S. to establish its own supply. Antimony is a key mineral in powering our lives – Americas use 44 million pounds of antimony each year. It is used in batteries, cellphones, hybrid vehicles and more. This would be a revolutionary development if we could secure this for ourselves.

All of these added benefits show why USFS should no longer tarry in giving this project as many green lights as it can to get up and running as soon as possible. The time and attention to detail that Midas has put into this has created a years-long process to earn approval. The sluggishness is a deterrent to future investment and innovation. During such time, the land has sat idle. These are missed opportunities to create jobs for neighboring communities, to develop the economy of Idaho, to mine needed resources for the country, and to bring about the aforementioned environmental restoration. Living in a nation where the government puts the brakes on projects like these is unsustainable and will leave us spinning our wheels. It is a signal to all future pioneers that it is not worth it to undertake such projects. In the land of opportunity, this cannot be the case.

We once again appreciate the opportunity to comment on this important matter. We thank you in advance for the time and attention dedicated to these comments, and hope the USFS will expeditiously approve this project for advancement.

Respectfully Submitted,

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