

October 26, 2020

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

To Payette Forest Supervisor Linda Jackson:

As former Governor of the great State of Idaho, I welcome new economic development opportunities that create well-paying jobs for Idahoans while supporting local businesses and strengthening our communities. That is particularly true when the opportunity in question will also have the added benefit of restoring and protecting Idaho's natural resources and beauty for future generations.

If approved, Idaho's workers, communities, and its environment would all benefit from responsible redevelopment of the Stibnite Mining District as proposed by Midas Gold in Alternative 2 of their plan for the Stibnite Gold Project. I do not believe we can afford to let this opportunity pass us by, and I hope you will agree.

#### **Idaho's Stibnite Mine Helped Win World War II**

The Stibnite Mine helped our Nation win World War II. The Mine produced more tungsten and antimony than any other mine in the United States right through to the end of the Korean War. Tungsten and antimony were critical minerals for defense; tungsten was needed for strengthening steel and antimony for hardening lead. Production of these critical minerals at Stibnite was so critical to the war effort that on May 15, 1943, then-General Eisenhower sent the mine a telegram in 1943 thanking the workers for their significant contribution to success at a critical moment in the War. "There is victory for all of us in the achievement," General Eisenhower proudly proclaimed to the Idahoans at Stibnite.

#### **The Process by Which Midas Gold has Informed Idaho's Public About the Stibnite Gold Project has Been Exemplary**

During my time as Governor, I was fully informed about the process by which the Stibnite Gold Project was developing and it is my experience that Midas Gold has been extremely transparent throughout the planning process for the Stibnite Gold Project. The company has worked with local residents and businesses to provide information and has updated and refined their plans for development and restoration based on the feedback from local communities. Also, the Company has collaborated with regulators at the local, state, and federal levels to ensure full compliance with environmental regulations, and then some.

Midas Gold has also conducted hundreds of meetings and webinars to further inform the public about the details of the Project. Instead of simply standing still, Midas Gold has leaned in and been proactive to give Idahoans all the important information they need to assess the important elements of the Stibnite Gold Project.

From the very beginning, Midas Gold has been proactive in reaching out to Idaho's Tribes to seek their input on the plan and try to identify ways to work together for the benefit of the environment. Today, the company continues to welcome tribal partnership on water quality testing, monitoring and fisheries restoration to help maintain good stewardship, as well as connection and participation in improving these natural resources. Midas Gold believes listening to tribal perspectives, incorporating their traditional and scientific knowledge, and providing an ongoing seat at the table and systems of accountability will allow the company to create a healthier region for everyone.

### **The Stibnite Gold Project Will be Critical to Idaho's Future Economy and Protect Domestic Security on Critical Minerals**

With regards to the economic impact this project would have on our State, Midas Gold has indicated it expects to directly employ hundreds of Idahoans during the construction phase as well as during full operations of the mine. These jobs are sorely needed and the salaries paid will give a tremendous boost to the local construction and skilled trades industry as well as a range of professions during operations—from management to electricians and engineers to geologists and environmental specialists.

Indirectly, the Stibnite Gold Project will support many hundreds more jobs spread out during all phases of the project. These jobs reach far into our communities as the development of the Stibnite Mining District would spur growth in the supply chain for goods and services used at the site, the transportation sector, as well as local services to support the increased needs local communities will see, from teachers to hospitality workers.

In addition to the jobs it would support, the project would also pump hundreds of millions of dollar into our economy annually. According to their plan, the Stibnite Gold Project will create roughly \$150 million in sales transactions in the regional economy over the lifetime of the project. Midas Gold would also pay hundreds of millions in federal corporate income taxes and \$86 million in state corporate income taxes, according to their projections. That revenue will help support Idaho communities and could even offset the need to increase taxes for many struggling rural communities.

For generations, Stibnite was known for its production of antimony, tungsten, and other valuable minerals that were critical to national security, particularly during the World War II era. Now, the need for antimony especially acute due to its many applications in the fields of defense and aerospace. Yet, as of last year, there was no domestic antimony production to speak of, and America is reliant on countries like China and Russia to access this critical mineral.



With this project, Idaho has an opportunity to reclaim its position as a leader in domestic antimony production in a way that also protects the environment.

### **The Stibnite Gold Project will Restore this Abandoned Superfund Site**

At the time Stibnite was at the heights of its historic production, there were no laws such as the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to ensure that those who pollute pay for environmental cleanup. Under CERCLA, the United States has diligently pursued all mining company potentially responsible parties (PRPs) and in 2012, the Environmental Protection Agency settled with most, if not all, of the Federal agencies such as the Forest Service, the Department of Defense, the Department of the Interior and the General Services Administration who were legally responsible for creating contaminated conditions on the Stibnite Site that still exist.

When I was Governor, elevated arsenic and antimony in ground and surface water sampling locations across the Stibnite Site were reported to the Idaho Department of Environmental Quality. Under our system of Federalism, the State of Idaho, not the Federal government, is responsible for control and management of groundwater. After EPA agreed to settle with the Federal agencies and abandoned the Stibnite site in 2012, Idaho was left holding the bag for the state of poor groundwater quality, and nothing has been done since to address these environmental conditions.

The Stibnite Gold Project will also offer an opportunity to develop the mine in an environmentally responsible way, following a materially higher standard of regulatory oversight than previous mining endeavors that have left the area in such a state of disrepair. The company has spent tens of millions of dollars on scientific studies and worked with experts to develop their plan for regulators. In total, the project has gone through more than three years of regulatory review by 11 different state and federal agencies, and received more than 50 permits for environmental, safety, and regulatory standards.

Modern mining in the 21st century is nothing like the mining of just a few decades ago, let alone more than 100 years ago when Stibnite was first developed. In addition to the increased regulatory standards and requirements, Idaho law ensures strong financial backing must be in place before any project like this can move forward. This financial assurance guarantees that Midas Gold will set aside funds reflecting the true cost of post-mining reclamation so these costs are covered from the start and will not be left to taxpayers to pay.

In fact, since I was first introduced to this project as Governor back in 2010, environmental protection has been the heart of the project's design. The company has committed to cleaning up the mess left behind at Stibnite by others, including fully restoring a tributary of the Salmon River; picking up, reusing, reprocessing, and properly storing legacy tailings, spent ore and waste rock; reconnecting fish populations to miles of upstream waters they have been cut off from for 80 years; and working to improve the local water quality and restore lost wetlands. Many of these efforts would even happen concurrently with development of the mine, so that

valuable years are not lost waiting for the project to be over before environmental restoration can begin.

**Conclusion**

Please take these thoughts into consideration as you continue to review the Stibnite Gold Project. When compared to the status quo or the other alternatives, the DEIS makes it clear that Alternative 2 should be approved without delay to allow Idaho to begin to reap the myriad of benefits this project has to offer not just to the economy but to our nation's strategic interests and the environment.

As Always – Idaho, "Esto Perpetua"

A handwritten signature in black ink, appearing to read "C.L. Butch Otter". The signature is stylized and cursive, with a large initial "C" and "O".

C.L. "Butch" Otter  
Former Governor of Idaho