

Oct. 20, 2020

Linda Jackson, Payette Forest Supervisor

500 North Mission Street

McCall, ID 83638

RE: Stibnite Mine Project

Dear Supervisor Jackson:

I appreciate the opportunity to comment on the Stibnite Mine project's Draft Environmental Impact Statement. This project has been studied, examined and vetted thoroughly, and I urge you to move it forward, as detailed in Alternative 2, with all reasonable speed. Idaho and America need it.

As you know well, the over-arching law for evaluating and permitting such projects is the National Environmental Policy act, or NEPA. It can be helpful to go back and review the purposes of NEPA, as stated in the statute. Along with establishing the Council on Environmental Quality:

The purposes of this Act are: To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation.

Those words describe the position of the Stibnite Mine "positioned to provide" productive and enjoyable harmony between people and our environment. NEPA doesn't say "let'em do whatever they want," nor does it say, "don't do anything" or "put up so many hurdles that saying 'yes' really means it's impossible to do." Productive and enjoyable harmony mean balance - balance like what the Stibnite Mine will provide. Society will get good-paying jobs and vital commodities, and the environment will be improved compared to current conditions.

How thorough has the planning and review been regarding this mine? Consider the fact that the Biological Assessment gave consideration to Southern Resident Killer Whales (SRKW). Bear in mind the mine site is roughly 400 air miles from the mouth of the Columbia River - and far more river miles (or approximately 550 driving miles). The thing is, the principle tether between the mine and the SRKWs are Chinook and Steelhead - which will benefit from Midas Gold's work at the site, including stream restoration.

If we as a society “and the US Forest Service as our representative in this instance” are going to take that type of broad view, then we also need to consider commodities through that lens.

The Oct. 8, 2020 edition of The Economist magazine carried an extensive package of stories examining how COVID-19 pandemic is and will affect supply chains and global trade. Under the headline, “Changing places: The pandemic will not end globalisation, but it will reshape it,” one story in the package reported this:

The blow struck by COVID -19 has made supply chains a “CEO and board level topic,” says Susan Lund of McKinsey, a consultancy. Until this year, she says, many firms did not realise how much their supply chains depended on China. In a survey conducted by McKinsey in May, some 93% of firms reported plans to make supply chains more resilient. The firm finds 180 products for which a single country accounts for over 70% of exports and reckons the production of 16-26% of goods exports could change location in the next five years. Firms are worried not just about trade wars and other shocks, but about their environmental footprint and labour standards. These are easier to monitor closer to home.

Dictionary.com defines the word “stibnite” as “a soft mineral, antimony sulfide, Sb_2S_3 , lead-gray in color with a metallic luster, occurring in crystals, often acicular, or in bladed masses: the most important ore of antimony.” Antimony, in turn, will be produced by Midas’ mine, and is a vital ingredient in multiple products, ranging from flame retardants to nuclear power to airplane parts. And of course, the United States produces a miniscule amount of antimony.

According to Statista, from 2015 through 2019, China produced more than double the amount of antimony as any other country - and Russia was the second-largest producer, followed closely by Tajikistan, and distantly by Bolivia, Turkey, Burma (Myanmar), Australia and Iran. And China has a spotty record at best regarding environmental protection and worker safety. As The Economist put it, environmental footprint and labor standards “are easier to monitor closer to home.”

Of course, the largest commodity produced by the mine is gold. Gold is typically thought of as jewelry, coinage, and backing currencies, but its multiple uses are often overlooked. For example, it is vital in almost every electronic device, and is necessary for various treatments for arthritis and cancers.

There’s another aspect of Midas’ plan that has received little attention yet demonstrates the commitment of the people who make up Midas Gold, and that is composting. Not exactly a glamorous or flashy activity, Midas’ composting plan is an example of making converting lemons into lemonade. Midas will take organic materials - trees, brush, etc. that it clears for the mine, compost it

and use that as an amendment to build up the area's soils that have withstood old-fashioned mining as well as fires. That healthier soil will, in turn, improve vegetation growth, habitat, and even water quality.

Finally, over the years I have had the opportunity to get to know several of the people at Midas. In the end, the performance of a company is connected to the people who work for it, and the Midas executives and employees are deeply committed to doing this project right - for the people and environment of Idaho and the United States. Again, please move through the ROD and the rest of the permitting process so more people can get to work.

Sincerely,

Eric Williams

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