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MEMORANDUM

To: Ms Linda Jackson, Payette Forest Supervisor
From: Jeff Barrett, Owner Paradox NR
Date: 10/28/2020

Dear Ms Jackson:

I am writing in support of the Stibnite Gold Project (SGP), and approval by the USFS of Alternative 2 as described in the Environmental Impact Statement.

Implementing Alternative 2 will provide tremendous economic benefits to Idaho, and in particular the local communities in Valley County that will provide many of the employees, services, and supplies for the project. The domestic provision of a strategic mineral, antimony, would also provide an important benefit to the United States as a whole. These economic and societal benefits could justify USFS approval of the project. Yet, the SGP also offers a once in a lifetime opportunity to significantly improve the natural environment as well.

Alternative 2 will result in the cleanup of millions of tons of mining wastes from previous operators in the Stibnite mining area. Without such cleanup these metals will be leached out into groundwater and surface waters for many decades or centuries. In addition, where these mining wastes are near surface waters, as along the East Fork of the South Fork of the Salmon River (EFSFSR) below the junction with Meadow Creek, direct erosion into surface waters is a certainty, again leading to decades of environmental pollution.

Similarly, Alternative 2 will result in both short-term and long-term improvement of aquatic habitats and the fish populations that depend upon them, including the ESA listed Chinook salmon, steelhead and bull trout found in the EFSFSR, helping the USFS to meet key goals of the Endangered Species Act, NOAA, and the USFS. Habitat improvements include temporary fish passage upstream in the EFSFSR past the Yellow Pine Pit (YPP), a very expensive proposal by Midas that will allow natural access to good spawning habitats in the drainages upstream of the YPP. Similarly, Midas will improve existing road crossings that currently provide either no fish passage, or impaired fish passage, that are impediments to free movement of fish and other animals under the No Action alternative. And during reclamation Midas has committed to spend millions of dollars engineering stream channels to permanently provide the kind of excellent fish habitat that will sustain salmon and trout into the future.

A mining project that provides benefits to society and simultaneously improves the environment should be easy for the USFS to approve, as you should. Denying the project denies all of these benefits.

Knowing that many stakeholders will be concerned about the SGP's potential impact on the environment, I would ask the USFS to respond to these concerns by discussing the enormous number of mitigation and minimization efforts in Alternative 2 to minimize or eliminate the potential environmental and human impacts of the SGP. These are buried in Appendix D of the EIS, so many stakeholders may have missed them. The USFS includes 156 separate mitigations, covering all phases of the project, and the resources that could or would be affected. It is an impressive and comprehensive list. Perhaps more amazing is that Midas has proposed more than 100 of its own mitigations, some of which expand on those selected by the USFS, but most representing unique mitigations that add on to the overall level of protection the SGP will provide to the human and natural environments. I was particularly impressed by the following:

- Restoring fish access to the EFSFSR above the Yellow Pine Pit, and in Meadow Creek. The enormous expense of providing access via a tunnel during mine operations shows the level of commitment by Midas to environmental restoration. And the final mitigation plans for stream habitats and fish access as part of the mine reclamation activities ensure that excellent aquatic habitat conditions and fish access will exist into perpetuity.
- The mitigation plans to eliminate the huge sediment inputs from Blowout Creek, and the attendant restoration of wetlands and aquatic habitat along the creek. This provides site specific benefits along Blowout Creek, but also system level benefits in Meadow Creek and the EFSFSR for fish and aquatic habitats by eliminating this large, persistent sediment source.
- The extensive engineering associated with the Tailings Storage Facility to prevent both any failure in the future, or the possibility of contaminated runoff.
- A wide variety of wildlife protection measures to avoid significant effects. And, as with aquatics, these measures commit Midas as part of its operations and reclamation to monitor sensitive species while also providing a strategy to avoid, minimize or mitigate impacts to wildlife.
- The many road construction, maintenance, and operations-related mitigations to ensure that roads used for the SGP are safe, erosion free, and do not lead to fish passage, fuel spill, or traffic related problems.

I am a Ph.D. level ecologist and aquatic scientist that has worked on streams and fish populations in the SGP area. Besides a variety of aquatic sampling programs, I have worked extensively with USFS, NOAA, and USFWS personnel to develop road restoration plans (Storm Damage Risk Reduction or SDRR treatments) to protect and help restore ESA fish populations in the area. It is with this background that I can offer my professional opinion that the SGP offers an unprecedented, once in a lifetime opportunity to benefit the fish and other aquatic species that are found in the EFSFSR drainage. Midas pays for it, the project provides lots of economic and strategic mineral benefits, and one end result is an enormous amount of high quality aquatic habitat improvements that biologists like me can only dream about. Wow!

In short, the USFS should approve Alternative 2 of the SGP because it has so many benefits, because it has so many protections and mitigations, and because it has been studied and analyzed for so long and in so much detail that the USFS and stakeholders can be assured that the benefits are real, and the potential problems have been adequately mitigated.

Please approve Alternative 2 of the SGP!