

October 28, 2020

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

RE: Comments of the Boise Section of the Society for Mining Metallurgy & Exploration, Inc. on the Payette and Boise National Forests' Draft Environmental Impact Statement for the Stibnite Gold Project

Dear Ms. Jackson:

This letter represents the comments of the Boise (Idaho) Section of the Society for Mining Metallurgy & Exploration, Inc. (SME or Society) on the August 2020 Draft Environmental Impact Statement (DEIS) prepared for Midas Gold Idaho Inc.'s (Midas) proposed Stibnite Gold Project located in Valley County, Idaho. The Boise Section of SME is regional affiliate of SME, a professional society (nonprofit 501(c) (3) corporation) whose more than 15,000 members represent professionals serving the minerals industry in more than 100 countries. Its members include engineers, geologists, metallurgists, educators, students, and researchers. The Society also advances the worldwide mining and underground construction community through information exchange, education and professional development. In supporting responsible mining, SME seeks to educate lawmakers, policymakers, and the public on the complex technical issues associated with mineral development, through technical briefing papers, studies, scientific and engineering articles.

As a regional affiliate of the Society, the Boise Section of SME comprises a broad range of geologists, biologists, engineers, regulatory agency staff, mine operators, educators and students from southwestern Idaho and the surrounding areas. Our members are active in Boise, Idaho and the surrounding communities and provide technical presentations and seminars, educational outreach programs for K-12 students, networking opportunities for university and college students, and we support the coordination and execution of the Idaho Mining Conference in collaboration with the Idaho Mining Association.

Given the proximity of the Boise Section to the Stibnite Gold Project and Midas Gold Idaho, Inc.'s Boise, Idaho office, members of the Boise Section of SME have been provided numerous technical presentations on the Stibnite Gold Project by Midas staff. Additionally, many of our members have visited Stibnite on geological field trips and guided site tours and observed the existing conditions. Thus, our Section members have a thorough and comprehensive understanding of the Stibnite Gold Project including the geology of the mineral resource, the history of mining that occurred at Stibnite over the past 100-plus years, and the existing environmental impacts to soil, groundwater and surface water that persist within the historical Stibnite Mining District due to the presence of legacy mine materials as well as regional mineralization.

The Boise Section of SME shares the Vision, Mission and Core Values of the Society. As such, we support in full the comments on the Stibnite Gold Project DEIS submitted by the Society's Executive Director and CEO, Mr. David L. Kanagy in a letter to Payette Forest Supervisor, Ms. Linda Jackson dated October 13, 2020. We reiterate them briefly here:

1. Antimony (as Stibnite) is a critical mineral and one upon which the United States is wholly import-reliant with the exception of minor sources produced by recycling. The Stibnite Gold Project would represent the only domestically mined source of antimony, a mineral that is crucial (and irreplaceable) to a broad scale of applications including alternative energy production, electronics, telecommunications, and defense. As noted in the Society's letter dated October 13, 2020; "A combined gold and antimony project, properly designed, well operated and subject to adequate regulatory oversight, would result in the combined benefit of producing a mineral that is indispensable to modern society and one that is critical to our nation's defense and economic needs".
2. The refinement and modification of Midas's Proposed Action, the Plan of Restoration and Operations (PRO), presented in the DEIS as Alternative 2, has been demonstrated through effects analysis included in the DEIS to be the most favorable alternative. The remediation of legacy mine materials, predicted improvements to surface water and groundwater quality and the environmental restoration components incorporated in Alternative 2 are preferable to the selection of the No Action Alternative (Alternative 5).
3. Modern environmental regulation is robust and will provide adequate environmental protections when appropriately enforced. In addition to approval under the National Environmental Policy Act, the Stibnite Gold Project will be required to obtain more than 50 additional permits and approvals from Federal, State and Local regulatory agencies and governmental entities. Being from Idaho, we understand the rigor of the regulatory framework under which the Stibnite Gold Project would be permitted, constructed, operated and reclaimed/restored. We note that the supporting environmental baseline data to support these permit applications and regulatory approvals has been underway by Midas, in some cases for nearly a decade. Whereas the absence of similarly rigorous environmental review (as well as the priority of providing another critical mineral, tungsten to national defense during World War II and the Korean War) in part led to the existing conditions at Stibnite, an operation conducted under modern mining and environmental regulation would be obliged to demonstrate that upon closure, the existing conditions at the Stibnite site would be improved.

We appreciate the US Forest Service's consideration of our comments to the Stibnite Gold Project DEIS. The Boise Section of SME supports the role of the private sector in site remediation. Inaction at this site, as represented by the No Action Alternative, is not an acceptable outcome because it would forgo this special opportunity to improve the environment, create significant economic opportunity for the region, and reduce the country's reliance on foreign sources of the critical mineral antimony. The Boise Section of SME joins the Society in urging the swift completion of the environmental review of this significant project.

Respectfully,



Shelley Bennett
SME Boise Section - Chair