Linda Jackson, Payette Forest Supervisor

U.S. Forest Service, Payette National Forest

500 North Mission Street

McCall, ID 83638

Supervisor Jackson:

I am writing to respectfully encourage the U.S. Forest Service to move forward with Alternative 2 of the proposed Stibnite Gold Project.

As a 5th generation Idahoan, some of my very earliest memories of were formed camping in our National Forests, from alongside the South Fork of the Salmon River to the Sawtooths.

Growing up in Idaho, we all naturally become conservationists. As children, the magic and beauty of our forests and public lands instill a deep loyalty and dedication to these public spaces. As adults, we strive to preserve this heritage for our own children while managing the need to create jobs that can support our families and produce the goods needed for modern life.

I keep this balance in mind as an employee of Midas Gold Idaho, an Idahoan, and the parent of three Idaho-born children.

This balance is also well articulated by the founder of our national forests, Gifford Pinochot when he said, “*Without natural resources life itself is impossible. From birth to death, natural resources, transformed for human use, feed, clothe, shelter, and transport us. Upon them we depend for every material necessity, comfort, convenience, and protection in our lives. Without abundant resources prosperity is out of reach.*” Here, Pinochot, the very man responsible for creating our vast public lands, signals to us that these lands are not only for us to admire – which surely, we do with great reverence—but they are also here to ensure our prosperity.

Pinochot, Roosevelt and the conservationist movement of the early 1900’s preserved lands as public so that these spaces may belong to all of us as a resource to access and enjoy, as well as to sustain our long-term progress as a nation. The U.S. Forest Service and dozens of federal regulations carry this responsibility forward through proper management and oversight of public lands and the many uses they provide.

I am confident that the Stibnite Gold Project achieves the intended purpose of our national forests and will do so under the careful guidance and management of the U.S. Forest Service and multiple other state and federal agencies and countless regulatory requirements and measures for oversight.

To produce and provide for our nation, particularly our rural communities surrounded by national forest lands, mining is an essential activity. The laws of the United States, including the National Environmental Policy Act, are designed to allow this economic activity to occur on public lands as long as impacts are addressed, and the project meets the applicable standards and regulations. The DEIS indicates that the Stibnite Gold Project can be accomplished in accordance with environmental standards, can provide prosperity to surrounding communities and can leave Stibnite better than it is today through the designed mitigation and restoration activities.

The company’s approach recognizes that responsible, modern mining means operating with within strict environmental standards, completing environmental restoration and providing economic opportunity and benefits to surrounding communities. In fact, the Project was designed with the vision that mineral development can provide the economic resource needed to restore a brownfield legacy site—economic and environmental needs working hand-in-hand. The restoration of legacy features through concrete commitments early on in the Project life to repair the East Fork South Fork Salmon River and improve water quality will help bring justice to Stibnite’s history and allow us to all once again access healthier public lands and resources at Stibnite.

The project will bring direct economic prosperity to families in Idaho and produce a critical mineral to help ensure our national security. Access to antimony, a listed critical mineral, and to responsibly sourced gold will bring prosperity through greater control over the supply chain and access to materials that make modern life from cell phones and pace makers to components of wind turbines and batteries. Producing minerals like antimony and gold here at home will help reduce our dependance on foreign nations and have the added benefit of helping manage and slow global warming by reducing the carbon emissions of mining in countries where practices are largely unregulated.

Midas Gold has progressive and pioneering ideas that can lead the way to a new era of responsible mining in the United States. However, it is not just talk. Midas Gold is putting this vision into action through the Plan of Restoration and Operations, company policies promoting corporate social responsibility, community agreements and sustainability programs. From the highest levels of leadership at Midas Gold I have witnessed a sincere commitment to doing the right thing.

As a company, Midas Gold operates with transparency to help ensure community members and stakeholders have access to information and an opportunity to speak directly with subject matter experts and company leadership.

* Midas staff participated in 900+ community conversations and presentations.
* Midas Gold brought 1,827+ visitors to Stibnite to see current conditions and hear about our plans.
* I have personally witnessed and been involved in outreach to individuals and groups throughout Idaho, including many prominent environmental and recreation groups, to encourage feedback so that we may work to satisfy questions or concerns. This has included countess technical presentations, data sharing and offers for continued communication. As a result, we have made -and will continue to make- the project better.
* The binding agreement to local communities through the Stibnite Advisory Council ensures transparency and accountability between Midas Gold and our neighbors throughout the life of the project.

Midas Gold is a community partner and has and will continue to list to and invest in our communities.

* The company spent 10,334+ hours partnering and volunteering in our communities.
* Midas Gold’s commitment to hire and contract local has already contributed $89 million directly to Idaho businesses.
* The Stibnite Advisory Council was designed to create a forum for local communities to bring forward potential concerns and so the company could work collaboratively to identify both solutions to those concerns and opportunities to provide benefits to the region.

Modern mining safety is more than just the result of increased regulatory requirements and scrutiny; it includes adherence to best practice in design, engineering, and safety practices that are rooted in the culture of the company.

* Midas Gold has 100+ months with no reportable spills.
* All 143 fuel convoys traveled safely to Stibnite.
* Midas Gold has completed 5,000 hours of staff safety training.

Midas Gold has placed the restoration of abandoned legacies and setting a higher standard for restoration of our own disturbances at the core of our project design.

* The project design prioritizes restoration activity, upfront and early in the project life including picking up legacy tailings and investing in a fish passage way to induce early returned migration to miles of currently blocked spawning habitat for chinook, steelhead and bull trout.
* The project is designed to minimize the project footprint by locating facilities on historically disturbed locations as much as possible. Alternative 2 also refined the design to reduce the footprint.
* The commitment to concurrent restoration and reclamation minimize the disturbance footprint at any given time and reduces risk to the resources.

The Draft Environmental Impact Statement (DEIS) published by the U.S. Forest Service is robust and includes over six years of scientific data gathering, review and design combined with nearly four years of additional regulatory review, data gathering, analysis, refinement and public participation. The robust and inclusive document confirms that environmental success is achievable alongside modern mining practices. For example, the **DEIS concludes restoring EFSF Salmon River to open blocked fish migration will assist the productivity for fish at Stibnite** (Ch 4.12 Fish Resources – 4.12-33) and that **removing legacy materials will improve water quality** (Ch. 4 Section 4.9).

Acid Rock Drainage is not a concern at Stibnite. In the site’s more than 100-year history and, more recently, based on sampling by government agencies, acid rock drainage has never occurred, and the development rock is generally non-acid generating (Ch. 2 Table 2.9-1). Simply put, the geochemical composition of the substantial majority of rocks at site, including those Midas Gold proposes to mine, make acid rock drainage improbable

**The DEIS concludes that the offered and required mitigation and restoration will address impacts. In fact, p**roposed mitigation will provide 1:1 replacement of wetlands acres, offers a net gain of 346.5 wetland functional units represents a 40% increase over existing conditions and provides a net gain of 21,941 stream functional units, a 23% increase over existing conditions. (DEIS Appendix D, Table 8-1)

I commend the US Forest Service for the tools they made available for the public during the public comment period, including the virtual meeting room and materials within. It is apparent by the meaningful and diverse comments submitted for your review that the public has had adequate time and access to resources to form their responses on the DEIS.

I am confident that Midas Gold will engage dutifully with regulators and the public should the review of the public comments bring forward potential refinements to the plan that provide environmental benefit and are both economically practicable and technically feasible.

Sincerely,

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