

January 8, 2023

Ms. Linda Jackson
Forest Supervisor
Payette National Forest
500 North Mission Street
McCall, ID. 83638

Re: Stibnite Gold Project (EIS No. 20220154)

Dear Ms. Jackson:

This letter is in response to the request for comments on the proposed Stibnite Gold Project (SGP). This project, which has undergone considerable technical (environmental, social, economic, etc.) review, will provide a domestic source of gold and antimony. I urge the Payette National Forest to move forward with this project (Preferred Alternative - 2021 Modified Mine Plan) as the selected alternative; there are a number of environmental, economic and domestic critical mineral supply reasons (described below) why this project should be approved.

Domestic Critical Minerals will be Provided

This project will provide in particular two metals that are important to the United States: gold and antimony. Global events during the last several years have shown the importance of the "supply chain" and the need for the United States to have domestic sources of important natural resources. This is especially true of minerals. Gold, which has many uses, has a growing demand for use in electronic technology products. That is because gold is a highly efficient conductor of electricity; it can very effectively carry small voltages and remain corrosion free. Such characteristics make gold a very reliable component to use in making electronic components. That is why gold is found in products so common to life in America (mobile phones, and microwaves), to advanced, extremely complex computer/electronic systems (example - global position system units) that are found throughout the U.S. economy.

Antimony, one of the other metals to be provided by this project, is why the Stibnite (and origin of the "Stibnite" name - from the mineral stibnite) site was mined extensively back in the 1940s. Antimony, like gold, has a large number of uses. The antimony mined at Stibnite was essential for providing the "hardening" of alloys found in bullets and other munitions used in World War II. That use is still important for today for the United States military; for national defense and security reasons antimony is truly a critical mineral. This mine can be an important *domestic* source of this metal so essential for defense purposes. Antimony is of growing importance in electrical and energy related technologies. As an example, an emerging battery technology, liquid metal batteries, utilize antimony in the cathode material. Such battery technology is being actively developed for grid-scale electricity storage; such storage is essential to integrate intermittent sources of electricity (wind and solar) into the electricity transportation system.

This Project Provides a Model on Addressing Abandoned Mine Sites

It is well recognized that historical mining that occurred in the United States before the advancement of environmental law and environmental protection technology, has resulted in a large number of abandoned mine sites that release hazardous substances into the environment. The Stibnite site, as mentioned above, was mined before such laws and technologies existed, and is a legacy mine site that releases contaminants into the environment. The United States Congress has wrestled for a number of years with how to address such mine sites. One concept has been called a "Good Samaritan" approach: i.e., develop a legal mechanism for an entity/organization to address the contaminants/environmental damage from such legacy mine sites. This project will accomplish such a purpose and provide an example of how a historical mining area can be "re-mined" to recover metals valuable (and critical) to the U.S. economy while addressing and resolving historical impacts from a legacy mine site. Such a "demonstration" project is invaluable to demonstrate a viable way to address (with many benefits) this very important natural resource issue.

Benefits to Anadromous Salmonid Habitat will Occur from this Project

A number of salmonids are present in the project area; key ones being Chinook salmon (*Oncorhynchus tshawytscha*), steelhead (redband) trout (*Oncorhynchus mykiss gairdneri*), Westslope Cutthroat trout (*Oncorhynchus clarki lewisi*) and Bull trout (*Salvelinus confluentus*). Currently, fish passage in the East Fork of the South Fork of the Salmon River (East Fork SFSR) is inhibited by the Yellow Pine pit. Thus, all streams upstream of the Yellow Pine pit are inaccessible to anadromous fish (without human intervention). This project will result in the removal of this fish passage barrier. Though, there will be localized impacts on salmonids during aspects of the mine operation, post closure there will be permanent habitat benefits for anadromous salmonids. Increasing habitat for anadromous fish is a regional high priority natural resource goal. Also, this project will reduce existing contaminant (antimony, arsenic and mercury) concentrations in local surface waters. Thus, there are a number of environmental benefits to address the impacts from legacy mining that will occur from this project.

The Project Will Provide Economic Benefits to Rural Idaho

Historically, like a number of rural counties in Idaho, both Adams and Valley counties had strong timber and mining businesses that provided relatively high paying jobs. With declines in both of these industries, and the growth in both of these counties as recreation/"second home"/destination locales, the local economy has transitioned primarily to a service based economy. This has resulted in lower individual income and earning potentials. The existing average annual wage for Adams and Valley counties ranges from \$35,948 to \$37,465. This project will provide high paying jobs. The average (unburdened) wage associated with the SGP is \$67,700. This is a considerable increase and would provide opportunities for economic growth in these counties. It should also be noted that spending associated with mine construction and operation will provide additional economic opportunities for the local rural economy.

Summary

The Payette National Forest should move forward with approving the 2021 Modified Mine Plan (preferred alternative). This project provides a "model" on how environment impacts from legacy mining sites can be dealt and achieve environmental benefits while producing minerals that are critical and important for the United States. In doing so, the SGP provides well-paying jobs and economic growth for this portion of rural Idaho.

The Forest Service's consideration of these comments is appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan L. Prouty", with a long horizontal flourish extending to the right.

Alan L. Prouty

