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Comments: October 15, 2020

United States Forest Service  
1400 Independence Ave., SW  
Washington, DC 20250-0003

Re: Stibnite Gold Project EIS #50516

To Whom it May Concern:

I am writing on behalf of Consumer Action for a Strong Economy (CASE), a free-market oriented advocacy organization, to express my strong support for Midas Gold's Stibnite Gold Project. The company's proposed plan represents an opportunity to take strong action in support of Idaho's economy, community, and environment. It deserves the support and approval of stakeholders from across the ideological spectrum.

We support this application for three primary reasons. First, the Stibnite Gold Project will deliver important and substantial economic benefits. Second, the project would bring environmental and ecological reclamation to Idaho's Stibnite Mining District - benefits that will not be attainable without the type of significant private investment Midas Gold has committed to make. Third, the project would help the United States strengthen its domestic supply chain and reduce reliance on foreign adversaries like China for resources - specifically antimony, a critical mineral - we need to support both our economy and our national security.

These points are outlined in greater detail below.

#### Economic Impact

The pandemic has devastated the American economy in ways few of us could have imagined just six months ago. Times are tough. But with every sign of recovery that emerges we are reminded of what's possible when our economy is running at full steam.

We are also reminded that full recovery and future growth will require support for and investment in thoughtful projects that create jobs and generate economic activity.

The Stibnite Gold Project is the type of endeavor that will provide a needed tailwind to our economic recovery while also strengthening our national security by reducing our reliance on foreign adversaries for the critical minerals our nation depends upon.

Midas Gold has already invested more than \$200 million in exploring, evaluating, and planning the Stibnite Gold Project, including roughly \$90 million in the state of Idaho. If the project is approved, they will invest another \$1 billion in the state over the roughly 20-year course of operations.

This kind of economic input comes with benefits that can change a community's fortunes. It reaches beyond direct investment to include things like local purchasing and procurement and millions in state and local tax revenue. That money grows the tax base and supports public schools, services like fire and police departments, and infrastructure like roads and bridges.

And during a time when millions of Americans find themselves out of work, the Stibnite Gold Project will also create hundreds of good-paying jobs.

Widespread economic recovery will take time. But proposals like the Stibnite Gold Project will go a long way toward accelerating the pace of that recovery and will also provide a foundation from which states and communities can continue to stabilize and grow. For the adjacent communities, for the state of Idaho, and for the broader economic outlook, this project deserves recognition for the impact it has already made and, more importantly, for the impact it will make in the future.

#### Environmental and Ecological Restoration and Recovery

The Stibnite Gold Project is a "pioneering" undertaking rooted in partnership with the communities surrounding the Stibnite Mining District, an abandoned legacy brownfields mining site. Far from being just another mining project, Midas' plan is a practical demonstration of the notion that mining and environmentalism can and, frankly, should work hand in hand.

The Stibnite site was mined for years beginning in 1899 but has sat idle for decades, degrading into the environmental blight it represents today. The damage done by legacy mining operations was significant. The East Fork of the South Fork of the Salmon River today flows into an abandoned mining pit. Salmon spawning and migration pathways are disrupted or cut off entirely, as they have been for close to a hundred years. And millions of tons of tailings and waste rock have led to decades of poor water quality, heavy sedimentation, and erosion.

Midas Gold's proposal as outlined under Alternative 2 would use modern, heavily regulated mining to responsibly extract hundreds of millions of pounds of these crucial and valuable domestic resources. And throughout the process, proceeds of the mining activities would be used to reclaim the land and water damaged by earlier and largely unregulated mining.

The company has committed to taking several crucial and significant steps to address these legacy environmental issues. They will address the diversion in the Salmon River, restoring the natural flow of the river and enabling salmon to migrate upstream. They will responsibly process tailings, recover and reuse waste rock, which the DEIS shows will improve water quality in the region. The company will help reforest the area. In fact, tens of thousands of trees have already been planted by the company. They will also adhere to local input on things like light pollution as they work.

Alternative 2 reduces the project's footprint and ensures the project moves forward in a timely manner. Alternatives 3 and 4 would delay the project by an additional two years, putting the benefits of this project unnecessarily on hold. Alternative 5 would leave the site as it is today, which seems preposterous given Midas Gold's offer to clean up this brownfield site without using any taxpayer dollars.

Alternative 2 is a once-in-a-lifetime opportunity to fix the problems that have plagued this site for so long. And without approval, this opportunity could be lost. The Stibnite Mining District has no path toward reclamation - no source of funding and no stakeholder with the expertise and will to reclaim this lost land - outside of the Stibnite Gold Project.

The company has demonstrated its commitment to reclamation and restoration since the start of the process, saying and doing the right thing from day one. To let the site sit idle and damaged for any longer would be an unnecessary and avoidable environmental mistake.

#### Domestic Access to Critical Mineral Resources

On the surface, the Stibnite Mining District is a mess of fouled salmon streams, spent ore waste, and abandoned mining pits - all of which Midas Gold is committed to restoring for future generations. Below the surface, though, the District home to one of the largest deposits of gold and antimony - a federally-designated critical mineral used for everything from defense and aerospace to consumer electronics - in the country.

The Department of Defense considers antimony to be one of the most important critical minerals to our national security. It has been a pivotal resource since the days of World War II. The Stibnite Mining District provided around 90% of the United States' antimony during that conflict. We need it desperately today too, but produce none of it here at home. Rather, we depend on imports China, the world's leading producer of antimony, for the supply we need. This is a dangerous strategic mistake.

It is no secret that the United States is in the midst of a years long trade dispute with China, nor is it a secret that China represents one of our most significant geopolitical and economic adversaries. Our interests are far from aligned, and recent history shows that China is more than willing to leverage any advantage it can to improve its standing relative to the United States.

Our current failure to produce antimony domestically amounts to a self-inflicted geopolitical wound and a ceding of strategic advantage to China and the world's other leading antimony producers, such as Russia. Unnecessarily handing control of the antimony supply chain to foreign adversaries is bad global politics and leaves us vulnerable to shortages, price spikes, and more.

The good news is that we can fix this problem. The Stibnite Mining District is home to ample antimony resources. All we have to do is make the decision to safely, responsibly extract those resources by approving the Stibnite Gold Project.

In addition to these important and, in our view, decisive arguments in support of the project, it should also be noted that the applicant has to date managed the exploration, application, and permitting process in a transparent, open manner.

The thoughts and opinions of all stakeholders have been deeply integrated into the plan throughout the process, and Midas Gold has engaged extensively with the communities closest to the planned work. They have communicated proactively and frequently, they have listened, and they have acted on what they have heard to make the plan work for the communities that will play host to this project.

As the comment period moves forward, and as the permitting and approval process reaches its conclusion, it's essential that policymakers, regulators, and other stakeholders recognize the vital role development of this nature can play in Idaho - and our nation's - path forward.

We are proud to offer our support to Alternative 2 of this project and look forward to its positive impact on Idaho and our nation.

Respectfully,  
Consumer Action for a Strong Economy (CASE)