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Comments: I have attached a comment letter from the Mining and Metallurgical Society of America.

Introduction

This water presents the comments of the mining and Metallurgical Society of America (MMSA)on the August 2020 Draft Environmental Impact Statement (DEIS) that the Payette and Boise National Forest prepared for Midas Gold Idaho Inc.'s (Midas Gold) proposed Stibnite mine project located in Valley County, Idaho . This project would become the nation's only domestic antimony my nan would help remediate a legacy mind site that is currently contaminating the areas watershed and impeding fish migration.

MMSA Is a professional organization dedicated to increasing public awareness and understanding about mining and why mined materials are essential to modern society and human well being period since its inception in 1908, MSA has provided valuable information and guidance to federal, state, and local governments on a number of important public policy issues dealing with mining. As minerals are essential to our daily lives, MMSA works cooperatively with other organizations at the state and national levels to ensure the nation has secured domestic supply of minerals.

Many MMSA Members are expert mining engineers, metallurgists, and environmental professionals who have years of collective experience working on issues germane to the proposed stibnite gold project. A number of our members are also very familiar with EIS documents prepared pursuant to the National Environmental Policy Act (NEPA) and the US Forest Service 36 CFR part 228 Subpart A surface management regulations governing locatable mineral projects like the stibnite gold project. Our members expertise makes MMSA highly qualified to provide informed comments on the stibnite gold project DEIS. We have had the opportunity to meaningfully review the Stibnite Gold Project DEIS and provide our comments below.

II. Critical Minerals

For the last several years, MMSA has focused on the country's over reliance on foreign countries for the minerals we need to support our economy, national defense, manufacturing, energy production, infrastructure, and technology. We recently hosted a well-attended webinar on evaluating the critical minerals supply chain that included an analysis of antimony imports and supply issues. We are especially interested in the Stibnite Gold Project because it will produce antimony, which the U.S. Geological Survey (USGS) designated as a critical mineral in 2018 1.

The important opportunity to develop a source of domestic antimony production at the Stibnite Gold Project is one of the reasons MMSA is providing these comments on the DEIS. According to the USGS' 2020 Mineral Commodity Summaries2, there were no U.S. mines that produced marketable antimony in 2019. Consequently, the U.S. imported 84 percent of the antimony we used in 2019. More than half of this imported antimony came from China. Recycling satisfied the roughly 14 percent of the country's antimony consumption.

MMSA believes there is an urgent need to reduce our reliance on production from countries like China for the antimony we use to produce flame retardants; ammunition; munitions; and specialized metals, ceramics, glass, and plastic products. We also recognize its importance as one of the minerals needed to construct renewable energy infrastructure including batteries for electric vehicles, wind turbines, and solar panels, which are all critical to the transition to a low carbon economy. Antimony is also needed to build the nuclear shielding used in submarines and other warships, and is essential in military camouflage and night vision equipment. The

aerospace industry uses antimony for composite materials that are indispensable to the emerging new generation of civilian and military planes. Consequently, we urge the Forest Service to complete the NEPA process for the Stibnite Gold Project and to issue a Record of Decision approving the project as soon as possible.

III. Abandoned Mine Lands

Another reason why MMSA is focusing on the Stibnite Gold Project and believes it should be authorized, as soon as possible, is our longstanding involvement with Abandoned Mine Land

(AML) policy issues. We co-sponsored 'AML Summits' in 2018 and 2019 with the Colorado School of Mines, the University of Nevada/Reno, and Trout Unlimited. (Our 2020 AML Summit was scheduled to take place in April but had to be canceled due to the pandemic.) AML experts from federal and state regulatory agencies, the mining industry, and the conservation community have participated in and spoken at these events. Many MMSA members, thus, have significant AML policy expertise that is applicable to the Stibnite Gold Project.

Midas Gold's Plan of Restoration and Operations (PRO) includes a significant remediation component to address numerous legacy environmental problems created during pre-regulation mining activities dating back to the 1890s. The integration of environmental restoration and new mining activities in the PRO represent a unique proposal to dedicate private-sector resources to clean up environmental problems that are harming the public and aquatic wildlife and that have gone unabated for decades at this site. It is imperative that this remediation work in the PRO be initiated as soon as possible.

The Stibnite Gold Mine site is not an "abandoned" mine site in the traditional sense due to Midas Gold's ownership of the site and the Company's proposal to clean up many of the pre- existing environmental problems that previous owners and operators of the site created before there were environmental protection regulations. Also, it should be noted that the federal government played a key role in creating these problems when it explored the site and helped fund mining for tungsten and antimony during World War II and the Korean War to support the military.

However, MMSA wishes to emphasize that, without Midas Gold, the Stibnite Mine site will become another AML that will be added to the long list of problematic AML sites at old, pre- regulation mines throughout the western U.S. If Midas Gold does not conduct the restoration and mining activities proposed in the PRO, the environmental problems at Stibnite will probably persist for many decades because it is unlikely there will be sufficient public-sector funding available to clean up the site.

Cleaning up the Stibnite site carries a high price tag. Midas Gold is proposing to invest nearly $1 billion in redeveloping this site and to provide the cash flow to undertake the restoration work. Both the public and the environment will benefit greatly from this investment. Importantly, the Environmental Protection Agency settled with the potentially responsible federal government agencies in 2012 under CERCLA3. MMSA is not aware of any other entity, including the federal government or the State of Idaho, that is willing to make an investment that would comprehensively remediate the site. MMSA, thus, believes this is a compelling reason to expedite approval of this unique opportunity to solve the environmental problems at Stibnite in the near future and without relying on taxpayer funding.

Midas Gold's visionary proposal to use private-sector resources to solve a public problem may have applicability at other AML sites. Although the Stibnite Gold Project has been carefully designed to address the site-specific conditions at Stibnite and, as such, does not represent a blueprint for other legacy sites, some of the remediation concepts may be appropriate elsewhere. For example, the PRO demonstrates the important role that removing, reprocessing, and re-

For many years MMSA and its members have been involved in policy dialogues with federal lawmakers and regulators about the need for Good Samaritan legislation to provide liability relief for groups, communities, and companies that want to perform Good Samaritan AML cleanups. Unfortunately, these discussions have not been fruitful in advancing a solution to the intractable AML problem.

A unique and laudable aspect of the PRO is that it is not a Good Samaritan project. Based on MMSA's reading of the DEIS, it does not appear that Midas Gold is seeking any kind of liability relief for its operations and is agreeing to comply with the water quality and other environmental standards applicable to all other mines. This is another compelling reason for the Forest Service to authorize the Stibnite Gold Project at the earliest opportunity. This pioneering effort to clean up a site without requesting future liability relief, or the applicability of lesser environmental standards, could pave the way for future projects to follow a similar path. There would be tremendous public benefits, if the Stibnite Gold Project approach could represent a different solution to the AML problem that could stimulate regulatory and policy dialogues to identify guidelines and a path forward that could be adopted elsewhere to cleanup other legacy sites.

Tailings

Many MMSA members are professional engineers with years of experience designing, building, operating, and closing tailings management facilities at mining operations throughout the world. We, therefore, took a close look at the site selected for the tailings storage facility (TSF) in the PRO and the alternative location evaluated in Alternative 3. We also examined the design of the proposed TSF, as described in the DEIS, Chapter 11 of the Midas Gold PRO, and the alternative analysis for the TSF locations and designs discussed in Appendix G of the PRO. (MMSA very much appreciates that the Forest Service included the PRO on the agency's Stibnite Gold Project EIS website.)

Midas Gold has retained companies with well-recognized expertise in planning and designing tailings management facilities, including SRK Consulting (Canada) and Tierra Group International, while the Forest Service retained AECOM to review these designs. These consulting firms are well qualified to assist Midas Gold and the Forest Service to select the optimal site for the tailings management facility, evaluate design alternatives, and choose the design that is most appropriate for the Stibnite site.

We would like to emphasize that there is not a universal, one-size-fits-all design for a tailings management facility. Tailings facilities must be designed based upon the findings from a comprehensive and detailed analysis of the site-specific conditions where the facility will be built and the nature of the tailings product that will be produced by the project's mineral processing facility. Some of the site-specific parameters that need to be carefully evaluated when selecting the best design for a tailings management facility include: climate (wet or dry, warm, cold, or temperate); site topography; site foundation characteristics; regional seismic hazard ranking; tailings texture (fine-grained or coarse); tailings moisture content; geochemistry of the tailings (acid generating, metals leaching or benign); and the costs and risks to construct, operate, and close the facility.

MMSA finds that the screening criteria for the Stibnite Gold Project TSF described in Section 4.2 of the DEIS and Section 8.3 of Appendix G to the PRO appear to have considered all of the site-specific factors listed above. The screening analysis also evaluated whether to store the tailings in an impoundment, in one or more of the pits, in underground workings, or at a remote location and looked at different tailings dewatering techniques and embankment construction methodologies.

Due to the steep terrain at the Stibnite Gold Project, there are relatively few feasible sites for the TSF that would have the capacity to store the approximately 100 million tons of tailings that would be produced by the project processing facility. The site selection evaluation for potential TSF locations at the Stibnite Project identified two potentially viable TSF locations that are evaluated in the DEIS: the Meadow Creek site (Alternative 2); and the East Fork of the South Fork of the Salmon River (EFSFSR) that is the alternative TSF site described in

Alternative 3.

Based on the information in the reviewed documents, MMSA concurs that these two locations appear to be the best options of those reviewed for the Stibnite Gold Project TSF. We have not done a thorough due diligence assessment, but both of the selected locations are located in relatively flat valley-bottom areas that avoid constructing the TSF as a side hill feature. A side hill feature would likely have inferior geotechnical stability compared to the valley bottom locations and would be expensive and inefficient to construct, operate, and reclaim.

The valley bottom sites have the added benefit of being surrounded by natural slopes that would form the perimeters around much of the TSFs, which minimizes the length of the constructed embankments and eliminates the need for constructed ring dikes around the perimeters of the facilities. Both of the valley bottom locations evaluated in Alternatives 2 and 3 would accommodate the proposed volume of tailings, and construction of the 65-million ton rock buttress comprised of project waste rock would add an extra measure of geotechnical stability to the TSF embankments.

We concur with Midas Gold's evaluation of the most appropriate tailings dewatering technology for the project, as discussed in Appendix G of the PRO. Table 2 in Appendix G does a good job of summarizing the relevant factors that were evaluated to select the best dewatering technology. In order to prepare this letter, MMSA has also reviewed the March AECOM memorandum (referenced as AECOM 2020c in the DEIS). Based on these documents, we concur with AECOM's and the Company's conclusions that thickened tailings technology is an appropriate option for the Stibnite Gold Project on the basis that it would provide a number of project- and site-specific operational and reclamation advantages. As discussed in more detail below, the Alternative 2 location would also produce a significant environmental restoration benefit because it would be built on the site where problematic legacy mine wastes are currently located and would avoid using an essentially pristine valley.

Although filtered (dry stack) tailings have been used in a variety of geographic settings with wide ranging climatic conditions, we understand that Midas Gold and its technical experts believe filtered tailings would not be the best option for the Stibnite Gold Project due to the wet and cold site conditions. Based on the factors discussed in the above-referenced March 2020 AECOM memorandum and in the PRO, Appendix G, Midas Gold's conclusion that filtered tailings would likely be unsuitable at Stibnite appears to be based on a thorough consideration of relevant site-specific facts. Their evaluation considered the following factors:

Climate

Filtered tailings are particularly well suited to managing coarse tailings in dry climates, which is obviously not the climate at the Stibnite Gold Project. Hauling large volumes of filtered tailings to a tailings management facility during freezing weather is challenging because the entrained moisture in the tailings tends to freeze during transportation and placement into the impoundment. For this reason alone, filter pressed tailings technology is not optimal for sites like Stibnite that have freezing temperatures for a significant portion of the year and that generate a large daily volume of tailings.

Energy Consumption

Generally speaking, filtered tailings management systems consume more power than other tailings dewatering technologies resulting in higher levels of power plant and vehicular air emissions, including greenhouse gas emissions, compared to conventional or thickened tailings. The filter presses needed to filter fine-grained tailings require a great deal of power to operate, which increases costs and generates power plant air emissions. Once the tailings are filtered, additional energy is consumed in transporting the filtered tailings to the TSF because this material has to be conveyed or hauled by trucks. Depending on the size of an operation, the fleet of trucks required to haul the tailings to the TSF can be quite large, which generates vehicular air emissions. If the site

uses power that comes from a power plant that uses fossil fuels, the mine's carbon footprint and greenhouse gas emissions will typically be larger using filter press dewatering technology compared to conventional or thickened tailings. The vehicular emissions associated with hauling the filtered tailings to the TSF have to be added to the power plant emissions in considering the project's overall air emissions inventory. In contrast, thickened tailings can be hydraulically transported to a TSF, which is quite energy efficient, and therefore, has lower project power plant emissions and completely eliminates vehicular emissions associated with transporting the tailings from the processing facility to the TSF.

Tailings Geochemistry and Water Quality Considerations

With the objective of limiting water quality problems at sites with tailings that could potentially generate acid drainage or metals-bearing leachates, a filtered tailings system is generally not the best way to manage tailings that have the potential to be acid generating or leach metals. Once they are placed in a TSF, dry-stacked filtered tailings are exposed to oxidizing conditions that can produce low pH and/or metals-bearing drainage that must be managed and may require treatment.

At many sites, the best way to minimize water quality issues for potentially acid generating tailings is to store them in a saturated condition to inhibit oxidation. Managing tailings, that are acid generating or leach metals by storing them under saturated conditions, can significantly reduce the development of acidic or metal-bearing drainage. It is also important to construct the tailings impoundment with a low-permeability liner - as Midas Gold has proposed, and as Idaho's Rules for Ore Processing by Cyanidation require - to minimize the potential for seepage from the base of the tailings impoundment into the groundwater.

Water Management Considerations

Filtered (dry stack) tailings systems located in wet settings may have challenging operational and long-term water management challenges that make this tailings management technology less suitable at some sites compared to conventional or thickened tailings systems. Infiltration of incident precipitation on filtered tailings is quite limited due to the impermeable nature of these materials. Consequently, frequent precipitation events on filtered tailings typically generate large volumes of sediment-laden contact water that has to be managed in containment on a liner, either within the impoundment itself or in nearby sediment ponds. In some cases, the footprint of the ponds ultimately needed to manage this contact water can be quite large because the pond storage capacities continually decline as the ponds fill up with sediments derived from the filtered tailings, while the contributing area of tailings grows. Sites that receive high snowfall have the added challenge of having to manage large volumes of water in a short period of time during the spring snowmelt or in response to rain-on-snow storm events.

In contrast, conventional and thickened tailings facilities are expressly designed to provide efficient storage of storm water within the surface of the tailings impoundment, which avoids the need for additional sediment ponds outside of the footprint of the tailings impoundment to store tailings contact water. The design for conventional and thickened tailings facilities must provide adequate storm water storage capacity to contain the precipitation from a very conservative (long-duration, high precipitation) design storm event. For example, according to the DEIS, the proposed Stibnite Gold tailings storage facility would be designed to contain the Probable Maximum Precipitation storm event and still have two feet of freeboard, even if the surface water diversions failed at the onset of the event. We note, however, that the design criteria for the TSF, described on Table 11-1 of the PRO, show the TSF will have four feet of dry freeboard above the stored inflow design flood to prevent wave run-up from overtopping the embankment. We suggest the Final EIS eliminate this discrepancy. Similarly, the discussion on Page 4.9-12 of "potential uncontrolled runoff" from the TSF should explain that the risk of this occurring would be minimized, if the TSF is appropriately designed and managed with sufficient freeboard to contain the Probable Maximum Precipitation storm event (see Section 2.5.5.1 of the DEIS,which states: "The TSF would be designed to contain the Probable Maximum Precipitation storm event with 2 feet of freeboard.").

Managing Failure Risks

A number of TSF design elements can substantially reduce the risk of loss of containment from the facility. The use of unsaturated tailings like filtered tailings (at sites where this technology is suitable) is one way to reduce the potential for failure because these unsaturated materials are generally not prone to liquefaction, and thus, do not behave like a liquid; however, runoff would still have to be managed.

The construction method used to build the TSF embankment and the need for impounding structures (ring dikes) around the perimeter of the impoundment are also important factors to consider in evaluating risks from potential failure. The Brumadinho tailings dam failure in Brazil involved an unlined tailings management embankment that had been built using the upstream embankment construction method in which successive lifts of the embankment were built from tailings placed upstream of the starter embankment on top of tailings. This tailings management methodology relies on the strength of the tailings for geotechnical stability of the facility. The company that operated this facility has also been charged with mismanagement and ignoring signals that a problem was developing. Failures have also occurred at facilities that relied on constructed ring dikes surrounding a portion of the perimeter of the impoundment - notably Mount Polley - which was raised using a modified centerline method (where the portion of the dam upstream of the centerline is founded on tailings) and was unlined.

The Stibnite Gold Project TSF does not involve using the upstream construction method or require a ring dike around any portion of the perimeter of the impoundment. The embankments for both proposed alternative sites (e.g., the Meadow Creek and EFSFSR locations) would be built using the downstream construction method in which each successive raise of the embankment will be built on solid ground downstream of the starter embankment, or on previously-placed compacted rock fill - not tailings. Additionally, both of the sites selected for the Stibnite Gold Project TSF have very favorable topography that capitalizes on hillslopes of in situ rock that will provide impermeable and stable containment around roughly 90 percent of the facilities' perimeters, obviating the need to construct ring dike impounding structures. The fact that the embankment itself is constructed of angular blasted rock, which will interlock on compaction, versus fine tailings, which are used in upstream construction, also inherently provides greater geotechnical stability. Additionally, the 65 million tons of waste rock that will be placed along the toe of the TSF embankment would buttress the embankment and provide a significant extra measure of geotechnical stability.

As discussed on Page 4.2-5 of the DEIS, the proposed Stibnite Gold Project TSF would have "an extremely low" potential to fail, with an estimated annual probability of failure of 1:10,000,000 in any individual year, assuming the TSF is properly operated and maintained. The DEIS also evaluates the safety of the embankment in the event of a sizeable earthquake and concludes that the structure would be geotechnically stable, both during operation and post-closure, if subjected to the Maximum Credible Earthquake for the site. As shown in the DEIS on Table 4.2-1, the TSF embankment would have a static factor of safety of 4.09, which considerably exceeds Idaho's regulatory requirement of a 1.50 minimum factor of safety for a static load. This table also shows that the pseudo-static factor of safety for an earthquake load also exceeds Idaho's regulatory requirements. As stated in the DEIS (Page 4.2-8), the failure of the TSF dam from a seismic event is considered to have an extremely low probability.

Finally, the foundation characteristics for sites being considered for tailings management facilities must be carefully investigated by performing detailed site geotechnical studies. As described in Appendix G of the PRO, the Blowout Creek Valley location, evaluated as a potential site for the TSF, was rejected because the geotechnical investigations revealed the presence of unfavorable foundation characteristics comprised of thick, saturated, and unconsolidated glacial till. As discussed on Page 4.2-5 of the DEIS, the numerous geotechnical site investigations determined the underlying bedrock at the proposed locations for the Alternatives 2 and 3 TSF is comprised of igneous rock types that are "more than sufficiently competent to support the proposed structures." However, the presence of a large paleo-slide within the footprint of the Alternative 3 TSF and buttress is a cause for concern regarding the suitability of the Alternative 3 site for the TSF.

International Cyanide Management Code

Page 4.7-5 of the DEIS states:

"the combination of Midas Gold's proposed management practices, conformance with the ICMC standards of practice, and the state and federal regulatory requirements described in the above measures, would minimize and/or mitigate the risk of accidental release during the transportation, storage, management, and use of cyanide and other hazardous materials."

The International Cyanide Management Code (ICMC) is a voluntary auditing and disclosure program for gold and silver companies that use cyanide in their processing of ores. The code focuses on the safe management of cyanide in metal recovery processes and processing wastes, such as mill tailings. Companies that adopt the ICMC must have their operations audited by an independent third party who meets the ICMC's criteria. The results of these audits are published on the publicly accessible ICMI's website. The ICMC is intended to complement the existing regulatory requirements and does not replace them. The ICMC addresses the production, transportation, storage, and use of cyanide and includes requirements for financial assurance, accident prevention, emergency response, training, and public reporting among other activities.

MMSA is familiar with the ICMC and we believe that projects that comply with ICMC are taking actions necessary to safely and responsively implement the use of cyanide in their operations. The implementation of the ICMC demonstrates Midas Gold's commitment to responsible management of cyanide in their operations.

Alternatives Analysis

The DEIS and the Forest Services' virtual meeting website do a good job of presenting and explaining the five project alternatives. Based on our experience with NEPA, there are a reasonable array of alternatives presented to the public in the DEIS. Focusing on the two proposed locations for the TSF, MMSA recommends the Forest Service select the Alternative 2 site as the preferred location, as we believe this alternative appears to offer the greatest opportunities for environmental enhancement. We have reached this conclusion on the basis for the following reasons:

The TSF at the Meadow Creek Valley location would achieve significant environmental restoration benefits associated with removing the old tailings and repurposing spent leached ore from previous mining. This 10-million-ton pile of old mine wastes is contributing significant levels of arsenic, antimony, and other contaminants to the watershed. Alternative 2 is an important opportunity to eliminate this adverse environmental problem by removing and reprocessing the tailings and isolating the spent leached ore from the environment by incorporating this material into the embankment of the Alternative 2 TSF and covering it with a low permeability liner. The environmental restoration that would be accomplished by building the TSF and buttress in the same location, as the legacy mine waste pile, is sufficient reason alone for the Forest Service to select Meadow Creek Valley as the preferred TSF location;

The Meadow Creek TSF location has reduced avalanche and landslide risks compared to the Alternative 3 site in the EFSFSR; and The Alternative 3 TSF location overlaps with a large paleo mass-wasting feature that could become destabilized when the toe is removed during construction of foundations for the TSF or the haul road servicing it, representing an increased risk compared to Alternative 2. This large landslide on the south bank of the EFSFSR should, therefore, downgrade the Alternative 3 TSF location in comparison to Alternative 2.

Additionally, the onsite lime kiln in Alternative 2 is an environmental and safety enhancement compared to the other alternatives. Producing lime at the onsite kiln would eliminate the need to haul lime to the site; thereby reducing the daily number of delivery trucks from 49 trucks to 33 trucks per day (DEIS at Page 4.7-18). This

reduction in delivery truck trips would reduce the potential for spills, improve traffic safety, and eliminate the vehicular emissions associated with hauling lime to the site. Using the unmineralized marble waste rock that must be mined from the pits to produce lime would have the added benefit of eliminating the surface disturbance that would be created by disposing what would otherwise have to be placed in a waste rock storage facility, and the offsite disturbance to mine limestone elsewhere for commercial lime production.

Financial Assurance

Many MMSA members have experience using the Standardized Reclamation Cost Estimator[reg] (SRCE) software tool that the Forest Service and the Idaho Department of Lands will use to calculate the reclamation cost and financial assurance requirement for the Stibnite Gold Project. Based on this experience, we are confident that the agencies' SRCE-calculated reclamation cost estimate will develop a comprehensive and conservative financial assurance requirement for the project. This requirement will be based on the assumption that the agencies - not the Company - will be performing the closure and reclamation work using government contractors and rented or leased equipment that must be mobilized to and demobilized from the site.

We agree with the statement on Page 2-75 of the DEIS that the SRCE would calculate a financial assurance amount that would provide the Forest Service with adequate funding to complete the reclamation plan and to pay for post-closure operations that could include operating and maintaining any required active or passive water treatment facilities, other site maintenance activities, and site monitoring for as long as required to return the site to a stable and acceptable condition.

Conclusions

MMSA appreciates this opportunity to provide these comments on the Forest Service's DEIS for the Stibnite Gold Project. We believe the DEIS provides a thorough and comprehensive analysis of the environmental consequences that would result from implementing Midas Gold's PRO and three alternatives to their project proposal. Our members, with NEPA expertise, believe the DEIS complies with the Council on Environmental Quality's regulations at 40 CFR 1500 for implementing NEPA.

Because the information presented in the DEIS is readily available to the public on the Forest Service's website (including the virtual meeting room), we believe the 75-day comment period provides the public with sufficient time to evaluate the project and submit comments. Therefore, we urge the Forest Service to maintain the 75-day comment period so work on preparing the Final EIS can start as quickly as possible.

Based on our members' expertise with the Forest Service's 36 CFR Part 228 Subpart A surface management regulations for locatable minerals, we believe the environmental consequences described in Chapter 4 of the DEIS demonstrate that Alternative 2 complies with these regulations. Additionally, we find that the environmental restoration benefits associated with Alternative 2 best accomplish the regulatory mandates at 36 CFR 228.8(a) - (h) that include minimizing adverse environmental impacts.

We also note that Alternative 2 best answers, in the affirmative, the questions posed in Chapter 2 of the DEIS:

Is there an environmental advantage for the alternative component?;

Is the alternative component technically feasible?; and

Is the alternative component economically feasible?

Finally, we are confident that the Forest Service's and the State of Idaho's environmental regulatory and financial assurance requirements for the Stibnite Gold Project will result in an environmentally responsible operation that

will be properly reclaimed when mining is completed.

MMSA believes the Stibnite Gold Project is a project of great importance to Idaho and the Nation because it will produce many environmental and economic benefits and will become the only domestic source of mined antimony. The environmental restoration measures that are an integral component of the PRO represent a unique opportunity to use private-sector resources to remediate the environmental problems associated with previous mining activities that are currently harming the environment and public health and safety.

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. Both Midas Gold and the Forest Service have invested an enormous level of time and effort to develop the DEIS.

We strongly recommend that the Forest Service complete the remainder of the NEPA process at the earliest possible opportunity so the many benefits associated with the Stibnite Gold Project can soon become a reality.

1 https://www.usgs.gov/news/interior-releases-2018-s-final-list-35-minerals-deemed-critical-us-national-securityand. See also 83 Fed. Reg. 23,295 (May 18, 2018).

2 https://pubs.er.usgs.gov/publication/mcs2020.

3The Comprehensive Environmental Response, Compensation and Liability Act, commonly known as "the Superfund." purposing historic mine wastes can play in an overall site restoration plan. Additionally, Midas Gold's preferred action (Alternative 2) maximizes the use of previously disturbed lands for the proposed facilities, thereby minimizing new surface disturbance.

Midas Gold's visionary proposal to use private-sector resources to solve a public problem may have applicability at other AML sites. Although the Stibnite Gold Project has been carefully designed to address the site-specific conditions at Stibnite and, as such, does not represent a blueprint for other legacy sites, some of the remediation concepts may be appropriate elsewhere. For example, the PRO demonstrates the important role that removing, reprocessing, and re- purposing historic mine wastes can play in an overall site restoration plan. Additionally, Midas Gold's preferred action (Alternative 2) maximizes the use of previously disturbed lands for the proposed facilities, thereby minimizing new surface disturbance

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