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October 12th, 2020

U.S. Forest Service, Payette National Forest Attn: Linda Jackson, Payette Forest Supervisor 500 North Mission Street
McCall, ID 83638
https://cara.ecosystem-management.org/Public/CommentInput?Project=50516

RE: Comments on the Payette and Boise National Forests[rsquo] Draft Environmental Impact Statement for the Stibnite Gold Project

Dear Ms. Jackson:

Introduction

Revival Gold (Idaho) Inc. ([ldquo]Revival Gold[rdquo]) is submitting these comments on the Payette and Boise National Forests[rsquo] August 2020 Draft Environmental Impact Statement ([ldquo]DEIS[rdquo]) for the Stibnite Gold Project in Valley County, Idaho. The DEIS evaluates Midas Gold Idaho, Inc.[rsquo]s ([ldquo]Midas Gold[rsquo]s[rdquo]) proposed Plan of Restoration and Operations ([ldquo]PRO[rdquo]) for a mining project that integrates new mining with remediation of a legacy mine site. The DEIS also analyzes several project alternatives.

Revival Gold is based in Salmon, Idaho. We are actively exploring the Beartrack-Arnett Gold Project, which is located in Lemhi County, Idaho. Our property position includes private lands and unpatented mining claims on National Forest System lands in the Salmon-Challis National Forest. The Revival Gold team is comprised of experienced mineral professionals including geologists, engineers, and environmental specialists.

Based on our work at the Beartrack-Arnett Project, we are thoroughly familiar with the U. S. Forest Service[rsquo]s ([ldquo]Forest Service[rsquo]s[rdquo]) 36 CFR Part 228 Subpart A surface management regulations governing mineral activities on National Forests. We are also knowledgeable about the State of Idaho[rsquo]s environmental protection and mining regulations and the financial assurance requirements for mineral projects. Our team includes environmental specialists who have extensive experience preparing Environmental Assessments and Environmental Impact Statements for mineral projects pursuant to the National Environmental Policy Act ([ldquo]NEPA[rdquo]). We are thus well qualified to provide comments on the Stibnite Gold Project DEIS.

Availability of Information and DEIS Comment Period

Before commenting on specific aspects of the DEIS, we would like to commend the Forest Service for preparing a very thorough and comprehensive DEIS and for making it easy for the public to obtain information about the proposed Stibnite Gold Project.

The Forest Services[rsquo] project website at https://www.fs.usda.gov/project/?project=50516 is well organized. We especially appreciate that this site is a [ldquo]one-stop-shop[rdquo] for all of the relevant project documents

including Midas Gold[rsquo]s PRO, the results of the Forest Service[rsquo]s scoping comment period, the DEIS, and the extensive list of references cited in the DEIS.

Additionally, we would like express our enthusiasm for and appreciation of the Forest Services[rsquo] virtual public meeting at https://stibnite.consultation.ai, which does an excellent job of describing the project and the project alternatives analyzed in the DEIS. The alternatives story map and the interactive maps of the project alternatives are very effective in helping the public compare and contrast the project alternatives.

Although we all wish that there were no pandemic and that in-person public meetings would have been possible, in many ways, the virtual public meeting is better because it is available to anyone on a 24/7 basis without having to travel or adhere to a certain schedule. Despite Revival Gold[rsquo]s interest in the Stibnite Gold Project, we probably would not have been able to take the time to travel to in-person public meetings because we are in the middle of our busy field season. The virtual meeting provided us with a very effective alternative way to participate in the public comment and DEIS review process. We encourage the Forest Service to use a virtual public meeting for other NEPA projects because of the superior accessibility and availability of virtual meetings compared to in-person meetings.

Considering the excellent availability and caliber of the information the Forest Service has provided in the DEIS, we strongly encourage the Forest Service to close the comment period on October 28, 2020. We thought the originally planned 60-day comment period was adequate. Now that the Forest Service has added another 15 days and extended the comment period to 75 days, we see no reason for the Forest Service to grant another extension beyond that [ndash] especially in light of the fact that the regulations only require a 45-day comment period for a DEIS. Another extension would not benefit the public. It would, however, delay the important environmental restoration measures that are an integral feature of the Stibnite Gold PRO.

There is Urgency for the Forest Service to Complete the NEPA Process

The Forest Service should complete the NEPA process and issue its Record of Decision authorizing the Stibnite Gold Project as soon as possible so the site environmental restoration activities can begin. All the action alternatives (e.g., Alternatives 1 through 4) integrate significant environmental remediation measures and improvements into the proposed mining project. (Although as discussed below, Alternative 3 is inferior to Midas Gold[rsquo]s Proposed Action in Alternative 2 because it would not remove or repurpose the old tailings or spent leached ore.)

Midas Gold[rsquo]s PRO involves an investment of roughly $1 billion of private-sector resources to clean up the legacy environmental problems that are currently creating a public problem. Without Midas Gold[rsquo]s proposed investment, it seems highly likely that the Stibnite site will remain a public problem for the foreseeable future. There are no other identified entities [ndash] including the federal government [ndash] that are offering to make this level of investment in remediating this site.

A protracted NEPA analysis could potentially jeopardize Midas Gold[rsquo]s restoration proposal. It is obviously not in the public[rsquo]s best interest to compromise or even potentially forgo this unique opportunity to capitalize upon private-sector resources to integrate remediation of legacy environmental impacts from old and unregulated mining with a modern mining operation. Without Midas Gold, there is a high probability that Stibnite will have to be added to the long list of Abandoned Mine Lands (AMLs) for which there is no source of funding to accomplish badly needed environmental remediation. Neither the State of Idaho nor the federal government have the necessary resources (on the order of $1 billion) to restore this site. Timely approval of Midas Gold[rsquo]s PRO for the Stibnite Gold project is thus imperative and will directly benefit the environment and the public.

The Forest Service Should Select Alternative 2 as the Agency Preferred Alternative

The DEIS includes a substantive analysis of the four action alternatives (Alternatives 1 through 4). As is the case for most proposed mining projects in steep terrain like the Stibnite site, there are relatively few viable locations for project facilities that could be considered as reasonable project alternatives. The legacy environmental issues at Stibnite further constrain reasonable project alternatives. Despite these constraints, the Forest Service is to be commended for taking a hard look at four project alternatives and evaluating several other potential alternatives that were eliminated from further study.

Based on the information presented in the DEIS and the interactive maps and information in the Forest Services[rsquo] virtual public meeting, it is apparent that Alternative 2 would produce the most environmental benefits and respond to most of the public comments raised during the 2017 public scoping period regarding project roads and access.

Some of the benefits and advantages associated with Alternative 2 include the following:

[bull] Achieves significant environmental restoration by placing the proposed tailings storage facility ([ldquo]TSF[rdquo]) in Meadow Creek valley where the old tailings and spent leached ore from previous mining are located;

[bull] Includes an active water treatment facility;

[bull] Adds an on-site lime kiln which will minimize traffic and vehicular air emissions, including greenhouse gases;

[bull] Responds to public comments requesting access to Thunder Mountain through the mine site;

[bull] Eliminates travel routes that parallel area streams, thereby reducing potential sedimentation and the risk of spills of hazardous substances into the streams;

[bull] Avoids identified avalanche- and landslide-prone areas, thereby reducing public and worker safety hazards; and

[bull] Minimizes the project footprint by eliminating the West End Development Rock Storage Facility ([ldquo]DRSF[rdquo]) by partially backfilling the Hanger Flats Pit.

The Forest Service Should Reject Alternative 3

Revival Gold appreciates the comparison of the geologic resources and geotechnical hazards associated with the project alternatives in Section 4.2 of the DEIS. Based on the information presented in this section, we strongly urge the Forest Service to reject the Alternative 3 location in the East Fork of the South Fork of the Salmon River ([ldquo]EFSFSR[rdquo]) for the TSF for several reasons. First, this alternative would forgo the important opportunity associated with Alternatives 1, 2, and 4 to build the TSF in the upper Meadow Creek drainage on lands already disturbed with and contaminated by old tailings and spent leached ore. Secondly, the TSF location in the EFSFSR lies below an identified avalanche corridor and would be constructed at the base of an identified large landslide, which increases risks to the project workforce and potentially to the long-term structural integrity of the TSF. Third, constructing the TSF in the Alternative 3 location would disturb currently pristine lands.

Finally, the transportation network associated with Alternative 3 is not as responsive to public comments regarding transportation routes as Alternative 2. Revival Gold encourages the Forest Service to incorporate the

public[rsquo]s preference for the project road network to the maximum extent feasible. Local stakeholders are in the best position to make knowledgeable and practical suggestions regarding the best transportation routes in the project area.

The Forest Service Should Reject Alternative 4

Additionally, Revival Gold urges the Forest Service to reject the transportation scheme proposed in Alternative 4 for several reasons. First, this alternative would delay mine start up by two years due to the extra time required to construct the Yellow Pine Route. Besides the obvious adverse economic impact this delay would create for Midas Gold, this delay would also mean that the adverse environmental conditions at the site would remain unabated for an additional two years. We also have safety concerns about ingress and egress into the project area in the event of a fire or an avalanche because the Yellow Pine Route would be the sole access route into the mine site as discussed in Section 2.6.5.3 of the DEIS. Given these considerations, the Forest Service should not select Alternative 4 as the Agency[rsquo]s Preferred Alternative for economic, environmental, and safety reasons.

2008 Idaho Roadless Rule

Revival Gold understands that minimizing road construction and use in areas subject to the 2008 Idaho Roadless Rule was a criterion evaluated in developing and analyzing the configuration of the project road network in the action alternatives. However, we believe the Forest Service should not focus on this criterion in selecting the Agency Preferred Alternative.

In fact, we think this criterion should be ranked as irrelevant because the Idaho Roadless Rule does not apply to roads needed for mineral access or to the use of lands for mining purposes in areas that are open to location under the U.S. Mining Law. Therefore, the Forest Service should not preferentially select an alternative on the basis of minimizing impacts to Idaho Roadless Rule roadless areas because the road use limitations and prohibitions applicable in these areas cannot be imposed on roads needed to support mineral activities. Any such limitations or prohibitions would violate Section 22 of the Mining Law, which mandates that lands open to the operation of the Mining Law be free and open to exploration and occupation for mineral purposes, and would also not be consistent with the 2008 Idaho Roadless Rule.

Surface Management Regulations for Locatable Minerals Protect the Environment

As the operator of an advanced-stage mineral exploration project on National Forest System lands (the Beartrack-Arnett Project in the Salmon-Challis National Forest), Revival Gold has first-hand experience working under and complying with the Forest Service[rsquo]s 36 CFR Part 228 Subpart A surface management regulations for locatable minerals (the 228A regulations). Based on this experience we have a high degree of confidence that the application of these regulations to the Stibnite Gold Project will result in a project that is fully protective of the environment, that minimizes adverse environmental impacts as required under the 228A rule, and that will be fully bonded.

The DEIS describes a number of mitigation measures designed to minimize impacts and to comply with the 228A regulations as well as other federal and state regulations. Revival Gold recognizes that the Final EIS and the Decision Record may include additional mitigation measures that the Forest Service deems necessary to ensure the Stibnite Gold Project complies with the mandate in the 228A regulations (at 36 CFR 228.8) to minimize adverse environmental impacts

Financial Assurance Requirements

As an operator of a mineral project on National Forest System lands, Revival Gold is also very familiar with the

Forest Services[rsquo] and the State of Idaho[rsquo]s financial assurance requirements. Based on our experience, we believe that the Standardized Reclamation Cost Estimator (SRCE) software that will be used to calculate the amount of required financial assurance produces very conservative (i.e., on the high side) reclamation cost estimates.

We are thus quite certain that the financial assurance required for the Stibnite Gold Project will provide the Forest Service and Idaho Department of Lands (IDL) with ample resources to reclaim the site if that ever becomes necessary. We therefore urge the Forest Service to dismiss claims from project opponents who assert

future mining at Stibnite will expose the public to future liability to reclaim or remediate the mine site. The Forest Service[rsquo]s and IDL[rsquo]s financial assurance requirements completely eliminate this concern.

The Community Agreement and the Stibnite Foundation

Revival Gold commends Midas Gold for working closely with the local communities to develop the November 2018 Community Agreement and to establish the Stibnite Foundation. The beneficial economic and social impacts are significant. The Forest Service should approve the Stibnite Gold Project as soon as possible so the communities can start realizing the economic benefits of the profit-sharing provisions in the Stibnite Foundation.

Conclusions

The critical mineral, antimony, will be produced as a by-product of gold production at the Stibnite Gold Project. Midas Gold[rsquo]s proposed Stibnite Gold Project is thus an important project for Idaho and the Nation because it will become the country[rsquo]s only domestic antimony mine and it will be a very significant producer of gold. The
U.S. currently imports antimony (a USGS-designated critical mineral) from China, Russia, and a few other countries. Domestic sources of gold are likewise of crucial and national interest to Americans.

The many environmental benefits that would result from developing the proposed Stibnite Gold Project are obvious and compelling. These benefits include but are not limited to the opportunity to remove and repurpose old mine wastes that are a source of contaminants, the proposed removal of the fish migration barrier at the Yellow Pine Pit, the eventual restoration of the EFSFSR to support two-way fish migration, and the remediation of sedimentation impacts at Blowout Creek. These restoration measures will have immediate and long-lasting environmental and public benefits.

Revival Gold believes that the DEIS does a thorough job of analyzing the impacts associated with the PRO and alternatives to the PRO. Based on our experience with other NEPA documents, we believe the DEIS fully complies with all NEPA requirements.

Because the proposed Stibnite Gold Project will become a much-needed domestic source of antimony, the project will create numerous short- and long-term environmental improvements, and will create over 500 well-paying jobs and numerous economic benefits for the region, Revival Gold urges the Forest Service to complete the NEPA review process, and publish a Final EIS and a Record of Decision authorizing this project as soon as possible.

Respectfully submitted,

Hugh Agro President and CEO