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Comments: Thank for you for allowing me to comment as a private citizen on Midas Gold Idaho, Inc.'s proposed mining operation at Stibnite. For reference, I am a licensed Professional Chemical Engineer registered in Idaho. I have over 40 years of extensive international experience in industrial operations, corporate level management, engineering, design, pilot plants, plant commissioning, economics, finance, consulting, legal matters, teaching, research, development, and professional service. In particular, I have applied experience and knowledge of Mining in Idaho as I lived and worked there for 12.5 years. For reference, I earned my PhD at the University of Idaho in December 1987. I then joined Sunshine Mining and Refining in Kellogg after my graduation where I was the Chief Process Engineer for 8 years. Analogous to the Midas project, at Sunshine we produced both Precious Metals and Antimony products.

Accordingly, I have reviewed the Draft Environmental Impact Statement (DEIS) and supporting documents and am familiar with the site and the project. Please consider my comments below for consideration in your review and decision-making process for the project under the National Environmental Policy Act.

As a career engineer, professor, technical author and advisor to industry and government I believe the DEIS more than adequately addresses the requirements of the mining laws and derivative regulations including NEPA. The document and the appendices contain and disclose detailed information about the proposed activities and alternatives developed to meet the requirements of NEPA.

The site was historically important producer of mercury, antimony, and tungsten with gold as a by-product during the WWI, WWII and Korean Wars and still contains one of the free world's largest antimony deposits. In fact, Stibnite provided approximately 90% of the U.S. antimony and 40-50% of the tungsten supplies during WWII and the Korean War and production at the site was deemed highly critical to the war effort resulting in heavy government involvement in the exploration, development and mining operations at the site. The result of this development during war time was extensive environmental damages to the site, many of which remain today. Midas Gold's plans to redevelop the site and inclusion of extensive site rehabilitation and reclamation and restoration of fisheries as outlined in their Plan of Restoration and Operations (PRO) is a win for the public in terms of job creation, increased and stable tax base for the local communities, responsible development and extraction of a critical material and for the environment.

Antimony is an important element with a vast array of industrial and military applications and the U.S. is highly dependent on foreign sources, primarily China, Russia and former soviet satellites and their allies and this project would provide a much needed domestic production source for the upstream raw materials supply chain. For reference, on behalf of the Society of Mining, Metallurgy and Exploration, I recently authored a definitive Chapter on Antimony. Antimony is listed on the U.S. Geological Survey's current list of 35 minerals considered "critical" to the U.S. economy, defense and manufacturing sector due to their essential uses {{difficult to substitute away from}} and high risk of supply chain disruptions and the element consistently scores high on various measures of "criticality" by U.S. and foreign governments (Figure 1).

One of its more important uses is in fire retardant formulations particularly in the electronics, plastics, and textile industries. While little known, it is a highly critical component of computer and electronics devices where it provides fire retardancy to circuit boards, wire sheathing insulation, motherboards and other epoxy resin and plastic components. For instance, a typical computer motherboard may contain up to several percent antimony (Figure 2) in the form of various oxides, and additional antimony may be found in alloys used in the solder, in wire insulation, as a dopant in various chips and capacitors and numerous other applications where it may occur in small quantities, but are extremely important. Downstream U.S. manufacturers are highly dependent on these

foreign suppliers for these raw materials and I urge you to promptly complete the permitting process for Midas Gold's project to help alleviate this dependency and reliance on foreign supply chains known to be unstable and subject to disruptions.

Other important uses for antimony include use in batteries and high technology devices and "green" energy applications. It is an important clarifier in high purity optical glass used in military applications, space and satellite technology, solar panels and energy efficient windows - an important consideration to meet energy conservation compliance regulations for new construction cutting down the generation of greenhouse gasses. Energy costs can be reduced in U.S. buildings thus making businesses more competitive. Having a domestic source for antimony will allow for development and manufacturing here at home versus buying items from overseas.

SEE LETTER SUBMISSION: Figure 1 Supply Risk and Economic Importance "Critically Matrix" from the 2014 European Commission to the European Union

SEE LETTER SUBMISSION: Concentration of elements in a typical printed circuit board (parts per million) From the 2015 National Academy Sciences Criticality Study #PNAS 201500415