

Data Submitted (UTC 11): 10/27/2020 6:00:00 AM

First name: Conway G.

Last name: Ivy

Organization: Ivy Minerals Inc

Title: Executive Chairman

Comments: I am writing in support of the Stibnite Gold Project (SGP), and approval by the USFS of Alternative 2 as described in the Environmental Impact Statement.

Compared to the No Action Alternative, the SGP will fulfill the purposes of the National Environmental Policy Act ("NEPA") by "encourage(ing) productive and enjoyable harmony between man and his environment to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation;". Alternative 2 will also help improve the balance of the "multiple use policy" of the US Forest Service by "managing the forest lands for sustainable multiple uses to meet the diverse needs of people while insuring the health of our natural resources". Lack of balance in implementing this policy has harmed many local communities through the elimination of employment opportunities and a reduction in tax base that supports local infrastructure and public services. This has resulted in many younger residents with families having to move from the area in order to earn a sustainable living.

Implementing Alternative 2 will unarguably provide tremendous economic benefits to Idaho, and in particular the local communities in Valley County that will provide many of the employees, services, and supplies for the project. The domestic provision of a strategic mineral, antimony, would also provide an important benefit to the United States as a whole. These benefits, were they all that was provided by the SGP, would support and justify USFS approval of the project. But they are far from the only benefits.

The No Action alternative leaves millions of tons of mining wastes from previous operators in the Stibnite mining area, where metals will be leached out into groundwater and surface waters for many decades or centuries. In addition, where these mining wastes are near surface waters, as along the East Fork of the South Fork of the Salmon River below the junction with Meadow Creek, direct erosion into surface waters is a certainty, again leading to decades of environmental pollution. The SGP clearly meets the NEPA objective of eliminating damage to the environment.

Similarly, the No Action alternative does nothing to reestablish fish passage upstream past the Yellow Pine Pit, denying access to good spawning habitat for Chinook salmon and bull trout in these upstream areas. And many existing road crossings that currently provide either no fish passage, or impaired fish passage, will remain as impediments to free movement of fish and other animals under the No Action alternative.

A mining project that provides benefits to society and simultaneously improves the environment should be easy for the USFS to approve, as you should.

But this being 2020, there are many stakeholders who will oppose this project, not because of the project impacts and benefits, but because they oppose any economic development on USFS managed lands. The USFS needs to strongly consider how will these opponents plan to clean up existing contamination in the SGP area? How will they restore fish passage past the Yellow Pine Pit? How will they improve fish passage at existing road crossings that do not provide it? And how do they propose to provide the jobs, the tax revenue, and the nationally strategic mineral antimony that the United States needs? If the answer is that they provide no pathway to any of these benefits, then the USFS must reject those comments that the SGP should be denied, however earnest their argument.

This is especially true given the enormous efforts that both Midas Gold and the USFS have put into minimizing the potential environmental and human impacts of the SGP. The USFS includes 156 separate mitigations

(Appendix D). Midas has proposed what looks to be 100 or more mitigations, some of which expand on those selected by the USFS, but most represent unique mitigations that add on to the overall level of protection the SGP will provide to the human and natural environments. I was particularly impressed by the following:

Restoring fish access to the EFSFSR above the Yellow Pine Pit, and in Meadow Creek. The enormous expense of providing access via a tunnel during mine operations shows the level of commitment by Midas to environmental restoration. And the final mitigation plans for stream habitats and fish access as part of the mine reclamation activities ensures that excellent aquatic habitat conditions and fish access will exist into perpetuity.

[bull] The mitigation plans to eliminate the huge sediment inputs from Blowout Creek, and the attendant restoration of wetlands and aquatic habitat along the creek. This provides site specific benefits along Blowout Creek, but also system level benefits in Meadow Creek and the East Fork of the South Fork of the Salmon River for fish and aquatic habitats by eliminating this large, persistent sediment source.

[bull] The extensive engineering associated with the Tailings Storage Facility to prevent both any failure in the future, or the possibility of contaminated runoff. Critics of mining everywhere always claim that TSFs are environmental disasters waiting to happen. But Midas has worked to provide a design engineered in this application to have such a high factor of safety that future failures are extremely unlikely. The long-term collection and treatment of seepage from the TSF also ensures long-term environmental protection.

[bull] A wide variety of wildlife protection measures, including some that, to me, seemed unnecessary (e.g., many of the restrictions on lighting). A mining project has the potential to affect wildlife, for example by exclusion from areas of active operations. But the USFS and Midas mitigation measures, collectively, provide as much protection as is needed to avoid significant effects, and, as with aquatics, commits Midas as part of its operations and reclamation, to monitor sensitive species while also providing a strategy to avoid, minimize or mitigate impacts to wildlife.

[bull] The many road construction, maintenance, and operations-related mitigations to ensure that roads used for the SGP are safe, erosion free, and do not lead to potentially related problems of fish passage, fuel spill, or traffic.

I personally have been active in the immediate Big Creek/Nellow Pine area since 1964 and through my mineral exploration company since 1978. Anyone who has been active in the area loves and respects its beautiful environment. Our company owns a significant number of mining claims in the area and is also developing claims in Nevada and Arizona. I have spent more than 40 years in mineral exploration and development.

I have worked extensively with the Payette National Forest (PAF), Valley County, residents in the Yellow Pine/Big Creek area, representatives of both the Nez Perce Tribe and the Idaho Conservation League and representatives of numerous federal agencies. Much of this activity was as a founding member of the Big Creek/Yellow Pine Collaborative addressing road issues in the area including those in the SGP operating area. This Collaborative was established and sponsored by Senator Crapo. My commitment to the Collaborative and its objectives is evidenced by my attendance in all but three of its monthly meetings during its six-year existence. My attendance required my flying from South Carolina to Boise and thence to Cascade by automobile for every meeting I attended. As a result, I personally know many of the stakeholders that would be affected by the SGP, and have listened to and understand the goals and concerns of these individuals and groups.

Given this background and experience, I am certain that PAF will receive many positive comments from citizens of the region that believe strongly in the need for the SGP, and the economic benefits that the project would entail. I am equally certain the Nez Perce Tribe and representatives of environmental organizations will oppose the project based on the specific narrow objectives of their organizations. From experience and observation, they will spare little time or expense to generate a laundry list of possible impacts of the SPG that, however unlikely,

they will argue should lead to USFS rejection of any alternative except the No Action one. In many instances at this point in the process they will bring up requirements for further study on non-material speculative project impacts that only serve to delay the project. Chasing these non-material impacts with further analysis is tantamount to the USFS making a No Action decision resulting in further environmental degradation. However, in response to this SGP EIS, their objectives conflict with the public policy purposes of the National Environmental Policy Act and the Forest Service multiple use policy mentioned at the beginning of my letter.

So, the USFS in coming to its decision should do the following:

[bull] The USFS should let the facts guide their actions. In my 40 years in the mining industry I have never observed a proposed mining project that has undergone more analysis and review, that contains more environmental protections and mitigations, or that offers such an enormous opportunity to clean up historic environmental contamination that will otherwise impact the environment for decades or centuries. And all this for a region that needs jobs, needs infrastructure, and that is eager for the chance to help the United States achieve a domestic source of a critical mineral, so that we are not dependent on China, Russia, or other unreliable sources.

[bull] In short, the USFS should approve SGP because it has so many benefits, because it has so many protections and mitigations, and because it has been studied and analyzed for so long and in so much detail that any claim of unknowns and uncertainties is either ungenueine, or reflects only those things that are unknowable for any project. I expect that the USFS will thoughtfully consider all viewpoints, but as lead agency, it has to put facts first. Approve Alternative 2 of the SGP!

Thank you for considering my views.