

**From:** Suda Cathy SPOK  
**To:** [FS-comments-intermtn-payette](#)  
**Subject:** Stibnite Gold EIS Scoping Comment  
**Date:** Tuesday, July 25, 2017 6:17:27 AM  
**Attachments:** [Midas StibniteProject Scoping Comment Letter7-20-2017.pdf](#)

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Supervisor Lannom,

Please accept the attached comments on the Midas project, with apologies for the late transmission.

Cathy Suda

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July 20, 2017

Payette National Forest  
ATTN: Forest Supervisor Keith Lannom  
Stibnite Gold EIS  
500 N. Mission St.  
McCall, ID 83638

Mr. Lannom:

**Re: Comments on the scoping for the Stibnite Gold Project, under the National Environmental Policy Act, per Federal Register Notice of Intent to Prepare an Environmental Impact Statement ("Notice") published in the Federal Register in Volume 82, Number 106, page 25759, Monday, June 5, 2017**

Teck American Incorporated (TAI) provides these scoping comments on the referenced Notice. TAI is a diversified mining company which conducts business in the U.S. as a subsidiary of Teck Resources Limited. We are headquartered in Spokane, Washington and operate two zinc mines in the U.S. Teck has developed, operated closed and reclaimed mines for over 100 years and is recognized for sustainability leadership. In 2016 Teck was named to the Dow Jones Sustainability World Index (for the seventh straight year), recognized as one of the Global 100 Most Sustainable Corporations and named to the FTSE4Good Global Index, a leading ethical investment benchmark index, among others awards. We have a dedicated Legacy Properties team, which manages and monitors our closed sites, and has received numerous recognitions, including awards from the Bureau of Land Management (BLM) and Arizona State Mine Inspector for our voluntary reclamation work with the BLM on the former McCracken Mine.

The Stibnite Gold Project is situated in an area of extensive activity related to historic mining operations. Development of a former town site as well as natural processes such as fires and high levels of erosion spanning over 100 years have resulted in significant degradation of many components of the natural environment. These historic factors have left behind in excessive erosion, soil loss, and loss of fish passage as well as the potential release of metals from previously mined and processed ores.

Midas Gold's extensive work on the site, as described in the Notice and other documents, includes over 5-years of exploration, environmental investigations of site conditions and their efforts to interact with and obtain and consider community input in planning and design of their proposed project.

The alternatives analysis in Appendix G of the Stibnite Gold Project Plan of Restoration and Operations (PRO) evidences the considerable effort that Midas Gold put into evaluation of potential locations for the project facilities and different mining methods. We urge you to select the proposed activities as outlined in the PRO as the preferred alternative during the EIS process and approve the project as outlined by Midas Gold.

The project affords the opportunity to use private-sector resources to restore the environmental damage that exists there while providing for the development of a critical and strategic mineral in the U.S. and provide positive economic impact to the region. Of specific note:

- The restoration of legacy environmental damages from nearly 100 years of human activity and fires.
- The restoration of fish passage to nearly 6-linear miles of stream channel and creation of significant new wetlands and aquatic habitat.
- The reprocessing of historic tailings and encapsulation of the currently unconstrained tailings into a properly engineered, modern tailings storage facility reducing permanently the risk of metal releases from the legacy operations.
- The generation of significant federal, State, corporate income and mine license taxes.
- Provide stable, high paying jobs that are not seasonal in nature, providing needed income year round to our community.

Please place TAI on the project mailing list for all future announcements, decisions and project related new releases related to the Forest Service and state and federal cooperating agencies including but not limited to the Department of the Army/U.S. Army Corps of Engineers, the U.S. EPA, the U.S. Fish and Wildlife Service, the Idaho Department of State Lands, the Idaho Department of Environmental Quality, and the Idaho Department of Water Resources.

TAI appreciates the opportunity provide thee scoping comments and we urge the Forest Service to make every effort to expeditiously advance the EIS process for the project.

Sincerely,



Catherine Suda

Manager, US Land & Assets  
Teck American Incorporated