



Idaho Farm Bureau Federation

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October 2, 2020

U.S. Forest Service, Payette National Forest
Attn: Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

RE: Stibnite Gold Project EIS #50516

Supervisor Jackson:

On behalf of the more than 80,600 Idaho families who are members of the Idaho Farm Bureau Federation (IFBF), I thank you for the opportunity to provide comments on the proposed Stibnite Gold Project spearheaded by Midas Gold Idaho. IFBF members span every sector of the natural resource industry. They range from farmers and ranchers, to foresters, miners, and recreationalist. Our grassroots policy supports the multiple use of our natural resources in a responsible manner to sustain yields and prosperity. We support the Stibnite Gold Project and are excited to see it move forward.

As an organization of Idahoans from across the state, we encourage your support for this project, particularly as outlined in Alternative 2 of the proposal and the draft Environmental Impact Statement (EIS). Not only will this project bring much-needed economic benefits to the entire state, it will enable Idaho to take the lead on developing a new domestic supply of a critically important mineral in a way that is highly protective of the environment.

Unlike past mining projects, the Stibnite Gold Project is a truly 21st century effort with unprecedented environmental protections and regulations in place. Although the historical mining that took place at the Stibnite mine was subject to lax regulations, or unregulated altogether, today's mining projects are held to some of the strictest permitting requirements in the world.

Like other modern-day mining endeavors on public lands, the Stibnite Gold Project has and will continue to go through a rigorous environmental permitting process under the National Environmental Policy Act (NEPA), including the comprehensive environmental impact analysis conducted by your agency. As you are undoubtedly aware, permitting for a project like this is a long and complex process involving dozens of reviews, analyses, and approvals from regulators at the local, state, and federal levels. NEPA guidelines, as well as other regulations in place, will ensure that the environmental mistakes of the past are not repeated today.

Additionally, Midas Gold Idaho has committed to putting environmental reclamation at the center of their project design. They have not only outlined how they intend to restore the environment surrounding the site, but have also committed to making financial assurances that this work is done the right way by going above and beyond the normal standard for determining reclamation costs. Rather than simply setting aside a required flat fee per acre, they have said they will consider many factors in determining the actual cost it will take for a third-party contractor to complete restoration work as part of their financial assurance.

According to the Draft EIS, the financial assurance that Midas Gold has committed to would “provide adequate funding to allow the Forest Service to complete reclamation and post closure operation, including continuation of any post closure active or passive water treatment, maintenance activities, and necessary monitoring for as long as required to return the site to a stable and acceptable condition” (2.3.7.16). It appears your findings verify what Midas Gold has indicated would be a higher level of commitment regarding their reclamation and restoration efforts at the site.

In addition, the ongoing operations throughout the project will help Idaho become a leader in developing a new, domestic supply of antimony, which is considered a critical mineral by the U.S. government due to its applications in the national defense, aerospace, and energy industries. Emerging technologies in these fields has led to a growing demand for minerals like antimony, according to the U.S. Geologic Survey (USGS); however, the domestic supply is extremely limited with no production of the mineral reported last year and only one processing facility in Montana that is able to produce miniscule amounts of antimony from recycled materials.

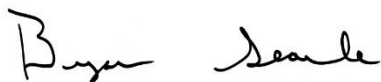
As a result, we are almost entirely dependent on importing antimony from other countries including China, Russia, and Tajikistan. Given the ever-changing political climate that can lead to disruptions in the supply chain, it is critical for America to be able to develop its own antimony resources, and the Stibnite mine is home to the largest-known deposit of this critical mineral in the United States. If Alternative 2 is accepted, Idaho will become a leader in antimony production while simultaneously strengthening our national security and reducing our reliance on other countries to meet our antimony needs.

It is important that the Forest Service accept Alternative 2 so that Midas Gold can begin to address the numerous environmental problems of the past that still plague the region today while resuming production of this critical mineral. The last thing we can afford to do is to do nothing, which is why selecting Alternative 5—the no-action alternative—should not be considered. Again, the draft EIS backs this up, saying, “Alternatives 1 through 4 would substantially reduce geotechnical risks associated with legacy mining operations through proposed reclamation activities” (4.2.4.1.3).

Again, thank you for this opportunity to provide comment. We ask the Forest Service to support this project and advance with Alternative 2. We feel that after the comment period, the agency should have enough feedback to make its decision and proceed through the permitting process.

Thank you for your time and consideration of this important issue.

Sincerely,

A handwritten signature in black ink that reads "Bryan Searle". The signature is written in a cursive, flowing style.

Bryan Searle, President
Idaho Farm Bureau Federation