



# International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

October 13, 2020

JAMES T. CALLAHAN  
GENERAL PRESIDENT

United States Forest Service (USFS)  
Attn: Linda Jackson, Payette Forest Supervisor  
500 North Mission Street  
McCall, ID 83638

RE: Stibnite Gold Project DEIS

Dear Ms. Jackson,

The International Union of Operating Engineers (IUOE) respectfully submits the following comments in support of the Alternative 2 of the Draft Environmental Impact Statement for the Stibnite Gold Project.

The International Union of Operating Engineers is one of North America's leading construction unions, representing over 400,000 hardworking men and women in the United States and Canada. Most members of the IUOE work in the construction sector, operating and maintaining heavy equipment. Our members possess specialized training and years of practical experience in surface mining. Many members of the IUOE work in hard rock, sand and gravel, coal and other mines throughout the country, including in Idaho.

Mining jobs are important to Idaho's economic stability. The Stibnite Mine will be a major economic boost for central Idaho. The project will provide good paying jobs for an estimated 600-700 workers during construction and 500-600 direct jobs during operations. These direct jobs during operation of the project are reliable, year-round jobs in an area that sees strong seasonal fluctuations in the labor market. Workers are estimated to earn an average of at least \$80,000 per year – twice as much as the average salary in Valley County. Midas Gold is committed to hiring, contracting, and purchasing supplies and services locally whenever possible. Furthermore, it is estimated that during construction the project will create 500-800 indirect jobs and 450-600 indirect jobs during operations.

With a cost of roughly \$1.1 billion to build and \$230 million each year to operate, the Stibnite Gold Project will inject hundreds of millions of dollars into Idaho's economy, bring hundreds of jobs into the state and contribute significant local and state tax revenue. The company currently estimates the annual payroll will be approximately \$42 million. The direct, indirect and induced impacts from local job creation are estimated at \$28.8 million per year in annual local income during construction, \$29.3 million per year during operations and \$5 million per year during final reclamation.

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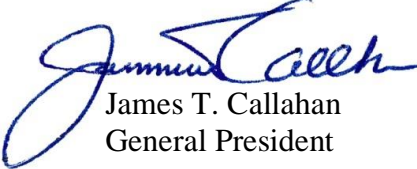
The International Union of Operating Engineers' experience in mining tells us that significant impacts can be mitigated by appropriate reclamation activities and protections for our valuable wildlife resources. We appreciate the Forest Service and other agencies' efforts to require significant mitigation, restoration, and enhancement of our public lands. The IUOE also appreciates the applicant's commitment to the community and environmental quality.

We have reviewed the DEIS and we believe the proposed mine includes advanced reclamation procedures and notable fish and wildlife habitat enhancement. Midas Gold's commitment to an open process, engaging in an extensive dialogue with conservation organizations, community members, and other stakeholders, is noteworthy and appreciated. Their thoughtful, inclusive approach to planning and permitting this state-of-the-art mine has improved the project for the community and the environment.

We believe these adequate environmental protections can be provided, while still allowing the mine to make significant economic contributions to the region, including significant revenue to the public coffers.

The International Union of Operating Engineers respectfully requests that your agency accept Alternative 2 of the Draft Environmental Impact Statement and its appropriate mitigation measures for the Stibnite Mine and promptly issue a Final Environmental Impact Statement and Record of Decision.

Sincerely,



James T. Callahan  
General President