

# Stibnite Advisory Council

October 16, 2020

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Ms. Linda Jackson, Payette Forest Supervisor  
USFS, Payette National Forest  
500 North Mission Street  
McCall, ID 83638

### **Re: Stibnite Gold Project EIS #50516**

Dear Ms. Jackson:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) regarding the Stibnite Gold Project. The Stibnite Advisory Council members are appointed by eight communities who are signatories to the Community Agreement signed in November 2018 with Midas Gold and representing citizens throughout Adams, Idaho and Valley Counties in the West Central Mountains area of Idaho. Since the Stibnite Advisory Council's purpose is to represent the interests of our communities in discussions with Midas Gold about the Stibnite Gold Project, we feel that commenting on the project is part of our responsibility.

Since the creation of our organization two years ago, the Stibnite Advisory Council has met regularly to get answers to questions local citizens have about the project and distribute factual information from Midas Gold as the Forest Service, other agencies, and the company have worked through the National Environmental Policy Act (NEPA) mandated review process for the Stibnite Gold Project. Now that the Draft EIS is available for public review, we offer the following observations and comments.

The Stibnite Advisory Council supports Alternative 2 of the DEIS. In our view, Alternative 2 provides the best opportunity for a successful outcome in our communities. In our opinion, this is the most comprehensive version of the Stibnite Gold Project from a social, environmental and business perspective. Further, Alternative 2 is the best option for our region since it incorporates substantial improvements developed by Midas Gold since 2016 compared with Alternative 1.

We do not support Alternative 3 as an option because it proposes a tailings location that is less environmentally sound than the location presented in Alternative 2. In Alternative 2 the tailings location proposed is a geotechnically stable area that has been previously disturbed.

We do not support Alternative 4 because we do not believe that Johnson Creek or the Stibnite Road should be used as primary access to Stibnite due to the potential environmental and infrastructure impacts in the Yellow Pine area. In our view, the Burntlog route as proposed in Alternative 2 is the most appropriate access for the project.

Alternative 5, the no action alternative, is not an acceptable option as the Stibnite site requires extensive clean up which will not occur if Alternative 5 is chosen.

If Alternative 2 is chosen, Midas Gold must enact their viable plan to resolve ongoing environmental issues by using the economic benefits that will flow from the Stibnite Gold Project to fix problems created by previous operations. Since Midas Gold is required to set aside financial assurance, the Stibnite site will get cleaned up if the Stibnite Gold Project proceeds. No other corporate entity, nor any government agency, has stepped up with a plausible restoration plan.

The Stibnite Advisory Council will maintain dialogue with Midas Gold throughout the life of the project to ensure community interests are represented. We will continue the ongoing conversation that has been informative, transparent and beneficial over the past two years. There is great potential for our communities, through respectful discussion, to address any issues and benefit from sustainable economic development during the Stibnite Gold Project and into the future.

Sincerely,

*The Stibnite Advisory Council*