



WYOMING MINING ASSOCIATION

1401 Airport Parkway, Ste. 230 - Cheyenne, WY 82001 - (307)-635-0331

October 22, 2020

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

RE: Comments on the Payette and Boise National Forests' Draft Environmental Impact Statement for the Stibnite Gold Project

Dear Ms. Jackson:

Introduction

The Wyoming Mining Association (WMA) is a statewide trade organization that represents and advocates for 27 mining company members producing bentonite, coal, trona (natural soda ash), and uranium. WMA also represents 120 associate member companies, one railroad, one electricity co-op, and 200 individual members. WMA appreciates the opportunity to submit the following comments on the Draft Environmental Impact Statement (DEIS) that the Payette and Boise National Forests published in August 2020 for the Stibnite Gold Project (SGP). We would like to encourage the Forest Service to prepare the Final EIS and issue the Record of Decision to approve this very worthwhile project as soon as possible for the following reasons:

1. The project proponent, Midas Gold Idaho Inc. (Midas Gold), is proposing to restore the environmental damage created by historic, unregulated mining activities in the course of developing a new, environmentally responsible gold and antimony mine;
2. Midas Gold's proposed Plan of Restoration and Operation (PRO) is offering to use private-sector resources (proceeds from the mining operation) to finance this brownfields cleanup, thus alleviating taxpayers from the future burden of having to pay to clean up Stibnite;
3. Midas Gold has designed the mine with state-of-the-art environmental protection technologies and will provide the Forest Service and Idaho regulators with comprehensive financial assurance to guarantee that the agencies will have sufficient funds to reclaim the site if for some reason Midas Gold cannot complete the reclamation;
4. The Stibnite Mine will produce antimony as a byproduct of the gold production and will become the Nation's only domestic antimony mine, which the U.S. Geological Survey has officially designated as a critical mineral¹; and

¹In 2018, the U.S. Geological Survey (USGS) included antimony in its list of 35 critical minerals <https://www.federalregister.gov/documents/2018/05/18/2018-10667/final-list-of-critical-minerals-2018>

5. The mine will become an important economic engine for central Idaho by directly employing about 600 people who will earn family-friendly wages and create numerous indirect and induced jobs in the region and pay substantial tax revenues to local, state, and federal governments.

Each of the above-listed reasons on its own merits would justify approving the SGP in a timely fashion. However, in the aggregate, these reasons create urgency for the Forest Service to approve this project on an expedited basis so the environmental restoration work can begin, the antimony production can help reduce the Nation's reliance on imports of this critical mineral, people can be put to work at well-paying jobs at the mine; and local, state, and federal governments can start receiving tax revenues.

Specific Comments on the Draft EIS

Thanks to the Forest Service's excellent project website and virtual meeting, WMA found it very easy to obtain an electronic version of the Draft EIS and related documents. The virtual meeting site presents an especially useful project overview and orientation. The virtual meeting format also made understanding the differences in the four project alternatives fairly straightforward.

WMA is going to encourage the various national forests in Wyoming to start using virtual meetings for seeking public comments on future NEPA documents. Even when the pandemic is over and in-person meetings are once again allowed, there will still be advantages to including a virtual meeting option during public scoping and commenting periods. Virtual meetings provide all stakeholders with an equal opportunity to become informed about a proposed project in contrast to in-person meetings, which give local stakeholders who can travel to in-person meetings an advantage over others.

WMA believes the Draft EIS does a good job of explaining the four action alternatives, describing the affected environment, and discussing the environmental consequences that would result from each of the four action alternatives. However, we found that the discussions of the No Action Alternative and the impacts to Dark Skies should be expanded in the Final EIS.

The No Action Alternative

It seems obvious based on the five reasons listed in Section 1 that the Forest Service must not select the No Action Alternative. The No Action Alternative would perpetuate the serious environmental problems that exist at Stibnite due to World War II and Korean War era mining. It would not make any sense for the Forest Service to forgo the important opportunity to restore the Stibnite Mine and surrounding area by rejecting the PRO. Consequently, WMA believes that in its role as the federal land manager, the Forest Service has an obligation to the public and the environment to accept Midas Gold's unique restoration and redevelopment proposal. WMA recognizes that this obligation does not in any way reduce the Forest Service's authority to regulate the project and to impose numerous environmental protection mandates and financial assurance requirements in the Record of Decision to authorize the SGP.

WMA recommends that the Final EIS more thoroughly explain the adverse environmental impacts that would result if the Forest Service were to select the No Action Alternative. These are important facts that the agency and the public need to consider in evaluating the SGP. Although we understand that the Forest Service doesn't have the discretionary authority to categorically reject the PRO because that would violate Midas Gold's rights under the U.S. Mining Law to develop its mining claims, the environmental benefits of the PRO create another compelling reason why the Forest Service must authorize the PRO. The three short paragraphs in Section 2.7 of the Draft EIS completely omit any discussion of the environmental problems that would remain at the Stibnite Mine – perhaps for decades into the future – without the PRO. This truncated discussion of the No Action Alternative is inadequate and should be expanded in the Final EIS.

Dark Skies

Dark Skies are an important resource in Wyoming – just as they are in central Idaho. WMA suggests that the dark sky issue in Section 4.20 of the Draft EIS could be expanded to incorporate some of the newer research on ways to minimize dark sky impacts from nighttime illumination of industrial facilities. In addition to the mitigation measures described in Section 4.20 (light shielding, pointing lights downward and focused on specific task areas, controlling fugitive dust to limit light reflectance, etc.), there are some additional techniques involving the use of properly selected LED lights, establishing light management areas, and conducting illumination maintenance and monitoring plans that may have applicability to the SGP.

Because dark skies are important in Wyoming, the Wyoming State Office of the U.S. Bureau of Land Management developed Best Management Practices (BMPs) for nighttime illumination of renewable energy facilities to mitigate visual and dark sky impacts, and published a report entitled: "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands." An electronic version of this report is available online at:

https://blmwyomingvisual.anl.gov/docs/BLM_RenewableEnergyVisualBMPs_LowRes.pdf.

Although this report pertains specifically to renewable energy facilities, I believe it has applicability to any industrial facility that requires nighttime lighting. Section 6.5 of this report discusses project lighting and includes a number of suggestions and examples of how to minimize glare, skyglow, and other light pollution impacts to nighttime skies.

Critical Minerals

The SGP presents the Payette and Boise National Forests and the State of Idaho with an important opportunity and obligation to authorize a modern, environmentally responsible mine, which will become the Nation's only domestic producer of the critical mineral, antimony. The Forest Service and the State must recognize the Nation's urgent need for antimony and do everything possible to expedite the permitting process for the SGP. Just last month, President

Trump declared a critical minerals national emergency due to our reliance on China and other foreign adversaries for critical minerals like antimony.²

In Wyoming's Black Hills National Forest, a prolonged NEPA process for a proposed mine to produce rare earth elements, (another critical mineral), resulted in the project proponent having to suspend the permitting process due to inadequate funding to allow it to proceed. In addition to the obvious problems the protracted permitting process created for the company, the inability to develop this project deprived the State of Wyoming of high paying jobs and tax revenues, and the Nation from the benefits of a new, domestic source of rare earth elements.

With this experience in mind, WMA urges the Forest Service to complete the NEPA process for the SGP as quickly as possible so the country can start benefitting from the antimony the SGP will produce. Also, in light of the economic downturn due to the pandemic, I'm sure Idaho badly needs the hundreds of well-paying jobs and the tax revenues the SGP will create.

In looking at the project timeline, it appears the Forest Service has already had four years to evaluate the PRO since Midas Gold submitted the PRO in September 2016. The pace of the remainder of the NEPA process needs to increase given the importance of the SGP to the local environment, the State of Idaho, and the Nation.

On October 17th, China enacted new legislation to restrict exports of rare earth elements (like the minerals that were proposed to be mined in the Black Hills National Forest in Wyoming), and other critical minerals. It seems probable that the export ban may include antimony. According to the U.S. Geological Survey, the U.S. imported 86 percent of the antimony we used in 2019 from China and Russia³. The Chinese government's export ban underscores the need for the President's recent declaration of a critical minerals national emergency, and elevates the importance of timely actions to put the Stibnite gold-antimony mine into production.

Thanks again for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Best regards,



Travis Deti
Executive Director

² Executive Order 13953 "Addressing the Threat to the Domestic Supply Chain from Reliance on Critical Minerals from Foreign Adversaries"

³ <https://pubs.er.usgs.gov/publication/mcs2020>