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Sent electronically

October 27<sup>th</sup>, 2020

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

<https://cara.ecosystem-management.org/Public/CommentInput?Project=50516>

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

Dear Ms. Jackson:

Itafos Conda LLC (Itafos Conda) is submitting these comments on the Payette and Boise National Forests' August 2020 Draft Environmental Impact Statement (DEIS) for the Stibnite Gold Project in Valley County, Idaho. The DEIS analyzes several project alternatives and evaluates Midas Gold Idaho, Inc.'s (Midas Gold's) proposed Plan of Restoration and Operations for a mining project that integrates new mining with remediation of a legacy mine site.

Itafos Conda is a phosphate mining and fertilizer manufacturing company based in Soda Springs, Idaho. We are currently operating the Rasmussen Valley mine and are actively permitting the Husky 1/North Dry Ridge (H1/NDR) project, both of which are located in Caribou County, Idaho. Our current and future projects include mineral leases on private, state, and federal lands in the Caribou National Forest.

The Itafos Conda manufacturing facility has been continuously operating for over 33 years and, based on successfully completing various mine permitting initiatives during that time, we are extremely knowledgeable with the U. S. Forest Service's (USFS) 36 CFR Part 228 Subpart A surface management regulations governing mineral activities on National Forests. We are also very familiar with the environmental protection and mining regulations and the financial assurance requirements in the State of Idaho.

The Itafos Conda team is comprised of many professionals who have extensive experience working through the National Environmental Policy Act (NEPA) process. Our experience and knowledge of these processes make Itafos Conda very well qualified to provide comments on the DEIS for the Stibnite Gold Project and we appreciate the opportunity to do so.

First, Itafos Conda would like to commend the USFS for preparing a comprehensive DEIS and for making information about the proposed Stibnite Gold Project readily available to the public. The thorough analysis of the four action alternatives included in the DEIS demonstrates the extensive effort by the USFS to achieve the most environmentally beneficial alternative for the project.

After a comprehensive review of each of the proposed action alternatives in the DEIS, Itafos Conda believes the USFS should select Alternative 2 as the Agency Preferred Alternative for the Stibnite Gold Project.

There are many benefits for choosing Alternative 2, including the following:

- Removal of the proposed West End Development Rock Storage Facility to reduce new project disturbance;
- Backfilling the Midnight mine pit and partially backfilling the Hangar Flats mine pit;
- Adding geosynthetic covers to development rock storage facilities to protect water quality;
- Moving the proposed road maintenance facility location to the Burntlog Route to protect the historic Landmark area;
- Rerouting sections of the powerline to reduce wetland impacts;
- Modifying the Burntlog Route to substantially reduce wetland impacts and avoid identified avalanche and landslide prone areas;
- Reduction in overall traffic during operations by operating a lime kiln onsite;
- Maintaining seasonal access through the proposed mine site during operations.

Additionally, based on the information presented in the DEIS, it appears that Alternative 2 would best meet the USFS's Purpose and Need requirements to:

- Ensure that the selected alternative, where feasible, would minimize adverse environmental impacts on National Forest System (NFS) surface resources;
- Ensure that, prior to approval, measures are included that provide for mitigation of environmental impacts and reclamation of the NFS surface disturbance;
- Ensure that the selected alternative would comply with other applicable federal and state laws and regulations.

Itafos Conda strongly encourages the USFS to reject both Alternatives 3 and 4. Although we appreciate the comparisons made by these proposed alternatives, neither provide as high of level of environmental protection, nor do they as adequately address public comments raised during the 2017 public scoping period regarding project roads and access.

In contrast to Alternative 2, Alternative 3 proposes placing the Tailings Storage Facility (TSF) in a pristine reach of the East Fork South Fork Salmon River and would leave the spent ore disposal area and underlying mine tailings in place. Alternative 2 places the proposed TSF in an area already heavily impacted by mining activity and cleans up the historical tailings. The location proposed in Alternative 2 is also safer from geohazards and will reduce the overall disturbance footprint than the areas of the East Fork South Fork Salmon River as proposed in Alternative 3.

In contrast to Alternative 2, Alternative 4 proposes site access stay along both Johnson Creek Road and Stibnite Road. These existing routes parallel major fish bearing waterways, increasing the risk of potential spills and sediment delivery to waterways. Alternative 2 places the site access road away from other drivers and users of existing routes and major fish bearing waterways, as well as avoiding known avalanche areas.

Given these considerations, the USFS should not select Alternatives 3 or 4 as the Agency's Preferred Alternative for environmental and safety reasons.



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Itafos Conda is also very familiar with the State of Idaho's financial assurance requirements and believe that the Standardized Reclamation Cost Estimator tool produces a highly accurate cost estimate for reclamation activities and protects the public from incurring potential costs associated with site cleanup. Concerns from project opponents who fear the Stibnite Gold Project will expose taxpayers to future reclamation liability should be rejected as these concerns are addressed by the USFS's and IDL's financial assurance requirements.

In conclusion, Itafos Conda urges the USFS to complete the NEPA process in a timely manner in order for Midas Gold to begin environmental restoration activities as soon as possible.

Each of the action alternatives identified in the DEIS incorporate significant environmental remediation measures and improvements into the proposed project and will allow Midas Gold to address longstanding environmental problems at the Stibnite site. Without this project, these legacy issues will likely go unresolved for many years into the future.

The many environmental benefits that would result from developing the proposed Stibnite Gold Project are clear. These benefits include, but are not limited to, the opportunity to remove and repurpose legacy mine wastes that are a source of contaminants, the restoration of a fish migration passage by removing the barrier at the Yellow Pine Pit, the restoration of the East Fork of the South Fork of the Salmon River, and the remediation of sedimentation impacts at Blowout Creek. These restoration measures will have both short and long-term environmental benefits.

Apart from the environmental benefits, the project will also create 500+ well-paying jobs and countless regional and statewide economic benefits. In addition, Midas Gold would become the only domestic source of mined antimony, a critical mineral needed for important technological, industrial and defense applications and necessary to reduce our reliance on foreign supply.

Itafos Conda believes that the DEIS thoroughly analyzes the impacts associated with the Plan of Restoration and Operations (PRO) and alternatives to the PRO. Based on our experience with the NEPA process, we believe the DEIS fully complies with all NEPA requirements.

This project truly provides a unique opportunity for Idahoans to leverage investment from the private sector to cleanup legacy environmental concerns, while also realizing significant economic benefits, and establishing a domestic supply of antimony. For these reasons, Itafos Conda urges the USFS to complete the NEPA review process and publish a Final EIS and a Record of Decision authorizing this project as soon as possible.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Timothy Vedder, III".

Timothy Vedder, III  
VP of Operations and GM Itafos Conda