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April 24, 2026

**United States Forest Service and Cooperating Agencies
Sawtooth National Forest
2306 Hiland Ave.
Burley, ID 83318**

RE: Comment Letter in Support of the Black Pine Mining Project Environmental Impact Statement

Dear Forest Supervisor and Project Manager:

The Idaho Mining Association (IMA) is pleased to submit these comments in strong support of the Black Pine Mining Project and the preparation of an Environmental Impact Statement (EIS) for the proposed mining operations in Cassia and Onieda Counties, Idaho. The IMA represents mining companies, suppliers, and related businesses operating throughout the State of Idaho and has a longstanding commitment to responsible resource development that benefits local communities while protecting Idaho's natural environment.

Based on our review of the project information to date, the Black Pine Mining Project represents an exemplary model of responsible mineral development. We respectfully urge the United States Forest Service to proceed expeditiously with the EIS process and to give full and fair consideration to the substantial environmental and economic merits of this project. Our specific points of support are detailed below.

1. Brownfield Redevelopment on a Previously Mined Site

The Black Pine Mining Project is proposed on a brownfield site that was the location of large-scale open pit gold mining operations during the 1990s. This history of prior disturbance is highly significant from an environmental review standpoint. Infrastructure corridors, graded areas, and reclaimed ground already exist within the project footprint, substantially reducing the scope of new surface disturbance required to bring the project into production.

Reuse of a brownfield site reflects precisely the kind of thoughtful, efficient land stewardship that agencies and the public have called for in mineral development. Rather than opening new ground in an undisturbed area, the Black Pine project maximizes the productive use of land already altered by previous operations. The IMA strongly commends this approach and encourages BLM to recognize brownfield redevelopment as a significant positive factor in its environmental analysis.

2. No Surface Waters Within the Project Area

The Black Pine project area does not contain perennial or intermittent surface waters, and jurisdictional waters of the United States are not present within the proposed project footprint. This characteristic further substantially reduces regulatory complexity and potential environmental impact.

The absence of surface waters means there are no fish habitat, riparian vegetation, or in-stream flow concerns associated with project construction and operation. Section 404 permitting requirements under the Clean Water Act are likewise minimized. The IMA views this as yet another indicator that the Black Pine project has been thoughtfully sited to minimize environmental conflict and to work within, rather than against, the natural landscape.

3. No Dewatering Required

One of the most noteworthy environmental attributes of the Black Pine project is that mine dewatering will not be required. Many open pit mining operations must intercept and manage significant volumes of groundwater to maintain safe and operable pit conditions, creating potential impacts to aquifer levels and associated water users. The Black Pine orebody is situated above the local water table, eliminating this concern entirely.

The absence of a dewatering requirement means there will be no drawdown of local groundwater resources, no need for large-scale water treatment and discharge infrastructure, and no associated permitting complexity under the Clean Water Act for dewatering discharges. This characteristic dramatically simplifies the project's water management profile and reduces environmental risk.

4. No Sulfide Ore and No Acid Rock Drainage Potential

The Black Pine deposit is a non-sulfide, oxide gold ore. This geology is critically important because it means the project carries no potential for acid rock drainage, one of the most significant long-term environmental liabilities associated with metal mining operations.

The complete absence of sulfide ore at Black Pine significantly reduces the environmental impacts associated with hard rock mining. The EIS should give appropriate weight to this fundamentally lower-risk geochemical profile, and we encourage the United States Forest Service to characterize this distinction clearly for the public and decision-makers.

5. Robust Job Creation and Rural Economic Development

The Black Pine Mining Project will be a transformative economic driver for Cassia County and the surrounding rural communities of south-central Idaho. Direct mine employment is expected to be substantial, providing family wage jobs and benefits to the local communities. The mining industry consistently offers wages well above the state average, and the positions created at Black Pine will provide meaningful career pathways for area residents.

Beyond direct employment, the multiplier effects of an active mining operation in a rural community are significant. Local suppliers of fuel, equipment, food service, transportation, construction, and professional services will see increased demand. Small businesses in nearby communities, like hardware stores, auto dealers, restaurants, and hotels, will benefit from an expanded local workforce with disposable income to spend. The IMA urges the United States

Forest Service to conduct a thorough economic impact analysis in the EIS that fully captures these direct, indirect, and induced economic benefits for Cassia County and the broader Magic Valley region.

6. Comprehensive Baseline Studies Supporting a Rigorous EIS and State Permitting Process

The Idaho Mining Association commends the project proponent for the exceptional level of environmental due diligence undertaken in advance of formal permitting. Comprehensive environmental and socioeconomic baseline data collection has been ongoing since 2017. This multi-year baseline program encompasses biological resources, air quality, soils, cultural resources, visual resources, noise, traffic, and socioeconomic conditions, among other resource areas.

This depth and duration of baseline study is exceptional in the industry and reflects a genuine commitment to transparency and rigorous environmental analysis. Long-term datasets capture seasonal and inter-annual variability that single-year or short-duration studies cannot, resulting in a much stronger scientific foundation for impact assessment and mitigation design. The IMA believes this investment in baseline science demonstrates the proponent's good faith commitment to meeting and exceeding regulatory expectations and producing an EIS that will withstand public and legal scrutiny.

The Black Pine Mining Project presents a rare combination of favorable environmental characteristics and meaningful economic opportunity. The Idaho Mining Association enthusiastically supports the Black Pine Mining Project and calls upon the United States Forest Service and its cooperating agencies to conduct a thorough, science-based EIS that gives full and fair consideration to the environmental merits and economic benefits described herein. We look forward to continued engagement throughout the NEPA process and stand ready to provide additional information or testimony in support of this important project.

Thank you for the opportunity to comment. Please do not hesitate to contact our office with any questions.

Respectfully,

A handwritten signature in blue ink, appearing to read "B. Davenport", with a stylized flourish at the end.

Benjamin Davenport
Executive Vice President
Idaho Mining Association