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Comments: RE: Stibnite Gold EIS Scoping Comment

Introduction

The Women's Mining Coalition ("WMC") is providing these scoping comments on the Stibnite Gold Project Environmental Impact Statement ("EIS") in response to the U.S. Forest Service's Federal Register Notice of Intent to Prepare an Environmental Impact Statement published in the Federal Register in Volume 82, Number 106, Page 25759 on Monday, June 5, 2017. We are submitting these comments electronically and in hardcopy.

The Women's Mining Coalition (WMC) is a grassroots organization with members located nationwide, including members who live in Idaho, the state in which the Stibnite Gold Project will be developed. WMC members work in all sectors of the mining industry including hardrock, industrial minerals, and coal; energy generation and distribution; manufacturing; transportation; and mining-related service industries. Many of our members have expertise in the environmental permitting requirements for hardrock mining projects, in the National Environmental Policy Act, and in the U.S. Forest Services' surface management regulations for hardrock mining at 36 CFR Subpart 228A.

We appreciate the opportunity to provide these comments and urge the federal agencies with regulatory jurisdiction over this project to complete the EIS process as quickly as possible so the environmental benefits of this project can be realized.

The Stibnite Project will Achieve Important Environmental and Socioeconomic Benefits

WMC is providing these comments on the Stibnite Gold Project EIS because our members support environmentally responsible mining. We view the proposed project as an exciting and important opportunity for a modern mining project to repair environmental impacts caused by previous mining activities that took place prior to the enactment of modern environmental protection regulations. Midas Gold Idaho, Inc.'s ("Midas Gold's") Proposed Plan of Restoration and Operations ("PRO") will use state-of-the-art environmental protection technologies and will achieve substantial environmental improvements using private-sector resources rather than taxpayer dollars. As such, it could serve as a template for how modern mining can play an important role in improving the environment at legacy mine sites.

Some of the most important environmental benefits that would result from redevelopment of the Stibnite Gold Project as described in the PRO include the following:

* Restoration of legacy environmental damages from nearly 100 years of human activity and fires.

* Development and restoration of a viable fish passage that has been closed off since 1938. Development of the new passage will allow fish access to nearly 6-linear miles of stream channel and creation of significant new wetlands and aquatic habitat.

* Reforestation of thousands of acres of previously burned areas to reduce excess sedimentation and increase biological activity that will result in improved diversity of aquatic species and terrestrial wildlife populations.

* Repair and restoration of nearly 10 miles of stream channels and riparian habitat.

* Repair or build over 350 acres of wetlands and 95 acres of open water habitat.

* Reprocess the historic tailings and build a lined and engineered tailings storage facility for the new tailings that will also be used to store and encapsulate historic tailings that are currently a source of metals leachate. This new tailings storage facility will provide permanent containment of the tailings and dramatically reduce the risk of future releases of metals-bearing leachate from the tailings left by the legacy operations.

* Reuse and re-purpose previously disturbed areas wherever practical.

In addition to these environmental benefits, development of the PRO will create many much-needed jobs, employing up to 1,000 people during the three-year construction phase and about 500 people during the 12 to 15-year mine life. These jobs will create a much-needed boost to the local, regional, state, and national economy. The project will be an important source of state, local, and federal tax revenues, estimated to be \$329 million in federal corporate income taxes and \$86 million in State corporate income and mine license taxes.

Although the Stibnite Project principally involves mining a gold and silver deposit, it also has a significant antimony resource that Midas Gold is proposing to develop. The Stibnite Project would become the country's only domestic antimony mine. Antimony is a critical and strategic mineral, which is needed for renewable energy projects and military and defense purposes. Development of the Stibnite antimony resource would dramatically reduce our Nation's reliance on foreign sources of this critical and strategic mineral.

Alternatives to be Considered in the EIS

The alternatives analysis is the heart of the NEPA process to determine the best approach to a project that minimizes impacts and maximizes benefits. Appendix G of Midas Gold's PRO is an extensive analysis of project alternatives. It is clear from this document that Midas Gold has devoted considerable effort to evaluate potential locations for the project facilities and different mining methods. It will be important for the EIS to evaluate these alternatives.

It is WMC's understanding that Midas Gold has done extensive work on the site, including over 5-years of exploration and environmental baseline studies to document existing site conditions. Their efforts have included considerable community outreach and involvement so their alternatives analysis takes into account input from community stakeholders in the planning and design of the Stibnite Gold Project. Based on our review of the PRO and Appendix G, it appears that Midas Gold's proposed plan has considerable merit and represents the most practical and effective approach to redeveloping this mine, cleaning up the environment, and restoring the watershed.

The No Action Alternative for the Stibnite Gold Project should receive special scrutiny in the EIS because, like all projects, it forms the baseline against which the proposed project impacts must be assessed. However, in the case of the Stibnite Project, selection of the No Action Alternative would result in a lost opportunity to use private-sector resources to restore the environmentally degraded project area and would perpetuate the environmental problems caused by legacy mining. Consequently, it will be especially important for the Forest Service to do a thorough evaluation of the No Action Alternative to properly assess the environmental benefits associated with Midas Gold's PRO. Although the No Action Alternative should be evaluated in detail, it is not a viable alternative because it would forgo the proposed environmental restoration and shift the costs of remediating the Stibnite site to U.S. taxpayers. Therefore, the Forest Service must not select the No Action Alternative as the Agency's Preferred Alternative.

WMC understands that in addition to securing the Forest Service's approval of the PRO, development of the Stibnite Gold Project will also require a 404 permit from the U.S. Army Corps of Engineers, an NPDES permit from the EPA, and permits from several Idaho state regulatory agencies. We urge all of the state and federal regulatory agencies with jurisdiction over the project to do everything possible to coordinate their permitting efforts by working together under the umbrella of the Idaho Joint Review Process.

Please place WMC on the project mailing list for all future announcements, decisions and project related new releases related to the Forest Service and state and federal cooperating agencies including but not limited to the Department of the Army/U.S. Army Corps of Engineers, the U.S. EPA, the U.S. Fish and Wildlife Service, the Idaho Department of State Lands, the Idaho Department of Environmental Quality, and the Idaho Department of Water Resources.

We appreciate this opportunity to provide scoping comments on the Stibnite Gold Project EIS. Given the important environmental restoration benefits that will result from implementing Midas Gold's PRO, we urge the Forest Service to make all reasonable efforts to expedite the EIS process for this project