

Data Submitted (UTC 11): 10/7/2020 6:00:00 AM

First name: R. Skipper

Last name: Brandt

Organization: Board of Idaho County Commissioners

Title: Chairman, First District

Comments: Idaho County is writing to provide comment regarding the Draft Environmental Impact Statement (DEIS) on the Stibnite Gold project as presented by the U.S. Forest Service.

The National Environmental Policy Act (NEPA) helps ensure all proposed projects meet strict standards for environmental protection. Stakeholders, regulators and experts have now reviewed the Stibnite Gold Project proposal for at least four years and local, state and federal agencies have analyzed the project. In our experience, Midas Gold Idaho has been transparent and cooperative, providing information to us on a regular basis. We have been provided with detailed technical information on water quality, safety and other project aspects when requested.

In communities throughout our country, we regularly see the scars left by historical mining on our landscape. It is important to us, and our local citizens, that before this project is approved it must first meet the strictest financial assurance requirements. We must be assured that the funding required to provide the required reclamation of Stibnite is set aside and protected through widely accepted financial tools rather than corporate guarantees.

Our initial concerns regarding this project were primarily about water quality and about construction of the tailings storage facility (TSF). Alternative 2 of the DEIS addresses these topics with thorough analysis.

Throughout the site, old tailings piles left by previous mining companies were never properly constrained and pose a risk of leaching metals into nearby streams and the groundwater. Under Alternative 2 in the DEIS, plans for the project during construction and operations will include activities to improve water quality, such as removing legacy waste rock, removing old underground workings and removing legacy tailings to reprocess and safely store them. It is very important that if mining operations are approved, these proposed actions to address legacy impacts remain in the final plan for the Stibnite Gold Project.

As it stands, the only opportunity on the table today to address legacy waste and contamination of the site is through approval of this project. What is not clear is what will happen if Alternative 5, no action, is selected? Will the current levels of contamination of our Salmon River continue?

The Stibnite site hosts a significant amount of antimony in addition to gold. If this project proceeds, Stibnite would be the only domestic source of antimony, a mineral critical to the defense of our country. By mining antimony at home in the United States, we would reduce our dependence on foreign sources of this important metal. Currently most of the global supply of antimony is sourced from China either mined in that country or processed into usable form there. The supply chain for important materials is continually at risk. For example, in 2013, China imposed restrictions on the export of antimony-based products for several years, reducing availability and increasing prices. More recently, China has mentioned restricting exports of critical and rare earth minerals as part of its trade negotiations. We need to develop mines here in the United States to improve our bargaining power and remove uncertainty associated with the potential disruption of the supply chain for critical minerals.

Our local economy is, in part, dependent on a healthy fish population. While there are many factors impacting the salmon population, it is positive to see private industry taking steps to enhance habitat and access. If done correctly, the rehabilitation of the East Fork of the South Fork of the Salmon River could set a positive example of river restoration activity throughout Idaho where streams have been heavily impacted by past mining activity. We know that barriers to fish passage negatively impact the population, the fish passage tunnel design could also set a very interesting precedent as a solution that could be used elsewhere in Idaho.

Section 4.12-39 of the DEIS shows reconnecting fish to more habitat upstream will increase productivity and diversity of these isolated populations. The opportunities presented by these innovative solutions could offer positive change for the future.

River health is extremely important to us in Idaho County, and should the project move forward we would encourage regulators to choose the Burntlog route as proposed in Alternative 2. This option keeps mine traffic away from Johnson Creek and the Salmon River, reducing the risk of spills or accidents that could impact important fisheries and the waters that flow through our community. By upgrading the Burntlog route for mining operations the risk of spills and sediment delivery into waterways will be reduced. Additionally, the overall transportation plan and two-week work cycle proposed is designed to reduce traffic on back country roads and this traffic reduction will also have the effect of reducing dust and sediment, reducing risk of accidents and related risk of spills.

We initially had some concerns about the construction of the tailings storage facility (TSF), and the risk of failure, as this would have devastating consequences for Riggins. Our concerns about the stability of the TSF are adequately addressed by DEIS Alternative 2.

Midas Gold's design for the TSF as outlined in Alternative 2 meet or exceed Idaho's regulations for safety. The design ensures long-term stability of the TSF structure which is strategically placed in a solid location with 90% of the perimeter surrounded by granite mountains and the remaining 10% retained by a rock embankment and further buttressed with 65 million tons of rockfill. These design features more than double the factor of safety required by the State. The TSF design can withstand an earthquake with six times more shaking than the recent 6.5 magnitude quake that occurred in the area in March of 2020.

With respect to the chemistry of the tailings deposited into the TSF, chemicals such as mercury, cyanide and arsenic will be neutralized, stabilized or removed as part of the processing cycle before any tailings material is deposited into the TSF, further reducing risk of impacting water quality.

Over the past few years, the ongoing study of the Stibnite Gold Project has highlighted the poor environmental conditions that exist today at Stibnite because of past operators. Arsenic levels in the East Fork of the South Fork of the Salmon River are far beyond safe standards. Each year, hundreds of tons of sediment continue to be dumped into the East Fork of the South Fork of the Salmon River and other waterways from Blowout Creek, impacting water quality and aquatic habitat.

Without the Stibnite Gold Project, we believe the ongoing environmental issues at the Stibnite site will persist well into the future. Further, this project represents the opportunity to source antimony in our own country, and reduce our dependence on foreign entities for our critical mineral needs. After our review of the DEIS, it is clear community voices have been heard, and there has been a thorough and adequate review of alternatives. The project should proceed.