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October 30, 2009

Bureau of Land Management  
Attention: Blackfoot Bridge EIS Project Manager  
Blackfoot Bridge Project, ARCADIS  
630 Plaza Drive  
Highlands Ranch, CO 80129

Re: Blackfoot Bridge Mine

The Northwest Mining Association (NWMA) appreciates the opportunity to comment on the Blackfoot Bridge Mine Draft Environmental Impact Statement (DEIS). The Bureau of Land Management (BLM) and the Idaho Department of Environmental Quality (IDEQ) have thoroughly considered the potential environmental, social and economic impacts of the Blackfoot Bridge mine plan, and we fully support Alternative 1A of the DEIS. This alternative provides for a beneficial mine that will be protective of the environment in the short and long term.

NWMA is a 114 year old, 1,750 member, non-profit, non-partisan trade association based in Spokane, Washington. NWMA members reside in 40 states and are actively involved in exploration and mining operations on public and private lands, including southeast Idaho. Our diverse membership includes every facet of the mining industry including geology, exploration, mining, engineering, equipment manufacturing, technical services, and sales of equipment and supplies. NWMA's broad membership represents a true cross-section of the American mining community from small miners and exploration geologists to both junior and large mining companies. More than 90% of our members are small businesses or work for small businesses. Most of our members are individual citizens.

The Draft EIS thoroughly examines the environmental impacts over the life of the Blackfoot Bridge mine and provides responsible mitigation to help reduce or eliminate any potentially adverse impacts. BLM and IDEQ should be commended for this proactive approach.

The agencies recognize that every mine site is unique and requires site specific measures. In the case of the Blackfoot Bridge mine, many environmental safeguards will be put into place that will protect the Blackfoot River, including the site specific use of overburden cover systems such as a laminated geosynthetic clay liner. The purpose of this liner will be to limit the natural infiltration of surface runoff from rain and snow to a tiny fraction of what would occur if this site were not covered.

Groundwater modeling was used in the DEIS to predict impacts over 200 years, well beyond the life of the mine. With the use of the laminated geosynthetic clay liner cover system, the modeling demonstrates impacts to the river would meet water quality standards without needing mixing allowances for offsets. The peak concentration of selenium in groundwater recharge to the

Blackfoot River for the Alternative 1A design is predicted to meet the water quality standards before it enters the river.

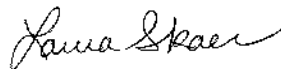
A reclamation plan will be required that reclaims the land and re-establishes wildlife habitat. The ecological restoration that will take place after mining will create a diverse ecosystem that encourages a large and thriving population of mammals, birds, insects and other living creatures.

The Blackfoot Bridge mine is essential to our nation's food supply because it will contribute to the overall productivity of farmers, in Idaho and around the world. The mine will maintain a U.S. source for phosphorous, a key ingredient in Roundup herbicide, which is a safe and effective source of weed control. Our nation already is dangerously reliant on foreign sources for too many minerals and metals. It is extremely important to our economic and national security that we responsibly maintain a U.S. supply of phosphorous and diminish our need to rely on foreign sources.

The Blackfoot Bridge mine will provide family-wage jobs that pay roughly three times the local average wage, plus excellent benefits, at a time Idaho and the nation desperately need them. Many of these jobs will be filled by NWMA members. Furthermore, the mine is critical to a phosphate industry that provides hundreds of jobs and significant financial contributions to the region, including state and local taxes and a direct economic impact of at least \$230 million in the State of Idaho.

Thank you for the opportunity to comment on the DEIS and recommend Alternative 1A. NWMA and our members believe this alternative provides many benefits to Idaho families, farmers and the nation while taking the necessary steps to protect the environment. We respectfully request the BLM approve the Blackfoot Bridge mine.

Sincerely,



Laura Skaer  
Executive Director