

November 10, 2022

Payette National Forest All Units
800 West Lakeside Ave, McCall, ID, 83638-3602
brian.d.harris@usda.gov

RE: Perpetua Resources Stibnite Gold Project, Idaho

Dear Review Committee:

I fully endorse Perpetua Resources proposal to develop the Stibnite Gold Project and recommend approval of their Plan of Operations. I am quite familiar with the region, its history, and its environmental legacy. My M.S. and Ph.D. in Geology are from the University of Idaho College of Mines and Earth Resources, and I conducted my M.S. research (on fluorite) in the nearby Meyers Cove, Bayhorse, Yankee Fork, and Stanley Districts. While not in the immediate area, I also worked on a silver exploration project on Cuddy Mountain, west of Cambridge, Idaho. I have been a professor of Geology for 33 years, teaching courses in Earth Resources, Environmental Geology, Environmental Geochemistry, and Environmental Law.

Upon reviewing the EIS and other available materials, I find that project is well thought out, sustainable, economically viable, and environmentally sound. The viability of the project is reflected in the statement in the DEIS "*Midas Gold's compilation of historic geologic and mineral resource data in addition to data acquired from their own exploration drilling programs (Appendix 1) have clearly identified a remaining mineable resource...*" This is further reflected in the statement, "*Midas has proposed a reasonable plan of operations for development based on their knowledge of the mineral resources in the project area and the infrastructure necessary to support mineral development of this scale.*" While the gold and silver grades and indicated resources are impressive, I'm more impressed that this will be the only U.S. mine project to provide much-needed antimony for domestic markets. In several of my courses, we discuss the green energy transition and critical minerals as defined in Executive Order 13817. Students need to understand where we are as a nation regarding mineral dependency, and this project is an excellent example of what we can do to reduce that dependency.

I agree with the statement, "*While no single alternative to a component of Midas's mining plan may prove to be solely without environmental or social impact, Midas has employed a technically thoughtful and industry standard approach in its consideration of the siting of the facilities necessary to support the development of their mineral deposit.*" The commitment to environmental and social issues is commendable, and I am impressed with how they propose to involve the community and regional stakeholders. The planned cleanup of legacy operations, environmental preservation, and restoration of fish habitat are critical aspects of this project which are well thought-out.

The changes outlined in the Modified Plan of Restoration and Operations (MODPRO2) reflect a solid commitment to environmental protection and restoration. The importance of this project in supplying the critical resource antimony in an environmentally conscious operation is of exceptional significance. Perpetua has collected a large amount of baseline data on present environmental conditions, including air, surface waters, groundwater, and much more, providing them with high-quality data to monitor the operation's environmental impact. Some of the more important activities that contribute to their environmentally sound plan include the fish passage around the Yellow Pine pit (an innovative solution), re-mining and processing the legacy tailings in the Meadow Creek Valley, reducing arsenic and mercury releases, and the backfilling of the open pits. I am sure that one concern individuals may have is the Tailings Storage Facility (TSF). The planned engineering design appears to be very well thought out and will ensure the long-term stability of the TSF.

The public's perception of the mining industry is that it is environmentally devastating and creates a legacy of environmental degradation that lasts for generations. Trust me; I hear this from my students. The planned environmental cleanup, commitment to protecting the environment during the mine life, and environmental restoration will help change the public's perception of the industry. Perpetua's response to public comments following the release of the DEIS shows a commitment to be good stewards of the land and its natural resources. Furthermore, the anticipated improved outcomes of MODPRO2 reflect Perpetua's responsiveness and concern for the project's impact on the environment. I fully believe that when mining is complete, Perpetua Resources will leave this beautiful region in better condition than it began. That alone should be a reason to approve their Plan of Operations. I strongly recommend approval of this project.

Respectfully,



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