

Thank you for the opportunity to provide feedback on the Stibnite Gold Project as part of the NEPA Comment Period. Full disclosure, I worked as part of an environmental consulting team for Midas Gold on this project from 2011 to 2015. I have not had any employment or other financial relationship with the Stibnite Gold Project or with any of its owners or operators since 2016, nor do I anticipate having any future opportunities to work at the site or to have any business with its owners/managers.

My history at Stibnite goes back to 1991. At that time I worked as part of an environmental consulting team when Dakota Mining operated at the facility in the 1990s. I developed a strong affinity for the Stibnite area and its history. Unfortunately, Dakota Mining was not a very good steward and I was often frustrated with their approach. My experience with Perpetua/Midas Gold was more positive, if not perfect. While their motives are primarily based on substantial potential financial gain, I believe they understand that it is in their best interest to operate the proposed mining operation in an environmentally responsible way. This includes 1) implementing all of the environmental protection and remediation actions specified in the EIS, PoO and Remediation Plan; 2) careful and diligent monitoring of surface water and groundwater quality, aquatic life, wildlife, and vegetation; and 3) direct, honest, and complete interaction with all managing and regulatory agencies, including the USFS, IDEQ, IDWR, and other interested parties. If these requirements are adhered to, I believe the ecosystems of Stibnite, Meadow Creek, and the EFSFSR will benefit in the long run.

Experience has shown that constant oversight on the part of the USFS and IDEQ will be essential. The relationship between Perpetua and its team and the oversight agencies should be cordial and cooperative, but there should be enough distance that oversight is effective. No one should be so naive as to think that Perpetua has altruistic motives; it is necessary for them to operate profitably in order to implement all of the monitoring and remediation requirements in the plan. But they are smart enough to understand that their success depends in part on keeping their promises. I also welcome the potential financial benefits to the community. As long as Perpetua is held to its obligations to operate responsibly and transparently, I support permitting and approval of the Stibnite Gold Project.

Patrick Naylor