



City of Council

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December 20, 2022

Ms. Linda Jackson
Stibnite Gold Project
500 N. Mission St, Building 2
McCall, ID 83638

Ms. Linda Jackson,

On behalf of the City of Council, thank you for the opportunity to submit comments on the Supplemental Draft Environmental Impact Statement (SDEIS) regarding the Stibnite Gold Project proposed by Perpetua Resources.

Council is a small rural community located in west central Idaho with deep historical ties to mining here in the Gem State. In the earliest days of Idaho settlement, a trail up the Weiser River through what is now Adams County became the principal avenue of travel for pack trains carrying supplies from Boise to the gold camps at Warren and Florence. Then when the Thunder Mountain mining boom came in 1902, Council was the nearest rail town and became the "jumping off point" for that gold rush. By about 1905, the town had a population of about 1,000.

Therefore, when Perpetua Resources came to the historical Stibnite Mining District more than a decade ago with plans to start operations at the brownfield site, we were naturally curious what the next era of mining would bring. Since their early days of exploration and study, Perpetua Resources has been working with local communities in central Idaho to describe their plans, potential impacts on this region, and listen to our input.

While a standard level of public review is mandated under the National Environmental Policy Act (NEPA), Perpetua Resources took this principle of public transparency and amplified it through the creation of the Stibnite Advisory Council. As a member of The Stibnite Advisory Council, we wanted to ensure Council had the opportunity to work directly with Perpetua Resources to have our questions answered, our interests represented and - importantly - to hold Perpetua Resources accountable. We have been encouraged to date by the efforts of Perpetua Resources to involve local communities and design the project with our needs- and the needs of the environment top of mind.

Since the beginning of our community agreement and partnership with Perpetua, members of the Stibnite Advisory Council have been privy to robust project discussions giving us insight and familiarity to this project. After reviewing the information presented by the U.S. Forest Service in the SDEIS, we believe the analysis provided by the agency is comprehensive and would like to offer the following comments for consideration.

We would first like to recognize the time and resources Perpetua Resources has put into the permitting of this project. Mining is viewed as an inherently risky business. Historical mining practices have left the

Stibnite Mining District beset with legacy-mining impacts like open pits and improperly controlled waste rock. However, Perpetua Resources was the first company to come in and dedicate nearly six years to studying the area as a comprehensive geological region, not just a potential deposit to be dug up. On top of this, the company has indicated they are prioritizing the best design aspects possible for their preferred plan. Not only did they originally submit the Stibnite Gold Project proposal to the U.S. Forest Service back in 2016, they resubmitted a modified plan in 2019 and again in 2021 after the DEIS comment period to incorporate additional improvements to help increase safety and decrease their environmental footprint.

We would also like to acknowledge the potential economic benefits that Perpetua Resources will bring to this region. As a town who got their start from mining, we know that new jobs and economic input from the Stibnite Gold Project could have a real impact on our residents and the future growth of our community. The company's investment in Idaho is something that could bring new business, families and opportunities to Council.

Perpetua Resources will implement solutions in the Modified Mine Plan that specifically address water quality, such as removing legacy waste rock, removing old underground workings and removing and reprocessing legacy tailings, thereby improving the water quality and local habitats. Multiple findings indicate these solutions will achieve their intended goal. Findings state that removing legacy tailings and waste improves water quality in Meadow Creek Valley and lowers concentrations of antimony and arsenic in the East Fork South Fork of the Salmon River.

In addition, you state in the SDEIS that "Restoration of stream and lake habitats and riparian vegetation with the active mine area after reclamation would result in a net increase in stream length and accessible fish habitat post-closure relative to baseline conditions and volitional fish access to habitats upstream of the Yellow Pine pit lake (Rio ASE 2021)". In fact, you also say the restoration activities, particularly providing volitional passage in the EFSFSR, would result in a major, permanent, regional and beneficial effect on Chinook, salmon, steelhead, bull trout and westslope cutthroat trout with in the vicinity of the mine." This sounds like a win for all of us.

Our motto is "the community that cares" and we stand by that. We care about the future and would not want to put our residents or this region's natural beauty at further risk. We urge the US Forest Service and responsible state agencies regularly monitor water and air quality to ensure standards are met throughout the life of the project. We also encourage regulators require that comprehensive financial assurance be secured before mining occurs to eliminate the risk of the area being abandoned once again.

Given the chance, the Stibnite Gold Project could bring jobs to central Idaho while raising the bar for their industry on safety and environmental protections. Therefore, we value the open dialogue about the challenges and opportunities presented by the development of the Stibnite Gold Project. To date, Perpetua Resources has fulfilled their responsibilities of being inclusive, transparent and responsive to our recommendations. For that reason - and the others we have outlined above - the City of Council would like to urge the U.S. Forest Service to adopt the Modified Mine Plan via Burntlog road as proposed by Perpetua and selected by the Forest Service as their preferred alternative for the Stibnite Gold Project.

Sincerely,



Bruce Gardner, Mayor