



Idaho Farm Bureau Federation

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December 27, 2022

U.S. Forest Service, Payette National Forest
Attn: Linda Jackson, Payette Forest Supervisor
500 North Mission Street, Building 2
McCall, ID 83638

RE: Support the Perpetua Resources Stibnite Gold Project

Dear Ms. Jackson,

On behalf of the nearly 80,000 Idaho families who are members of the Idaho Farm Bureau Federation (IFBF), I thank you for the opportunity to provide comments on the proposed Stibnite Gold Project spearheaded by Perpetua Resources.

IFBF members span every sector of the agriculture and natural resource industries. They range from farmers and ranchers, to foresters, miners, and recreationalist. Our grassroots policy supports the multiple use of our natural resources in a responsible manner to sustain yields and prosperity. We support the Stibnite Gold Project and are excited to see it move forward.

As an organization of Idahoans from across the state, we encourage your support for this project, particularly as outlined in the Modified Mine Plan Alternative of the supplemental draft Environmental Impact Statement (EIS). Not only will this project bring much-needed economic benefits to the entire state, but it will also enable Idaho to take the lead on developing a new domestic supply of a critically important mineral in a way that is highly protective of the environment. Unlike past mining projects, the Stibnite Gold Project is a truly 21st century effort with unprecedented environmental protections and regulations in place. Although the historical mining that took place at the Stibnite mine was subject to lax regulations, or unregulated altogether, today's mining projects are held to some of the strictest permitting requirements in the world.

Like other modern-day mining endeavors on public lands, the Stibnite Gold Project has been subjected to a rigorous environmental permitting process under the National Environmental Policy Act (NEPA), including the comprehensive 2020 Environmental Impact Analysis conducted by your agency and the supplemental EIS released in October 2022. As you are undoubtedly aware, permitting for a project like this is a long and complex process involving dozens of reviews, analyses, and approvals from regulators at the local, state, and federal levels. NEPA guidelines, as well as other regulations in place, will ensure that the environmental mistakes of the past are not repeated today.

Additionally, Perpetua Resources has committed to putting environmental reclamation at the center of their project design. Perpetua's comprehensive reclamation and closure plan outlines a number of practical means to reclaiming and revegetating the site, as summarized in 2.4. The growth media salvage will allow re-use of soil resources. Use of USDA suitability criteria for growth media and root zone reclamation materials will ensure appropriate agronomic properties to allow for successful revegetation. The plan to manufacture growth media using screened materials augmented with mulch and compost can be an effective means to address the growth media shortage identified in the document using locally sourced materials. Use of glacial till materials from the Yellow Pine pit to offset the growth media deficits makes good sense – that material would need to be moved anyway for mining. Selection of native plants species and weed control measures is consistent with USFS reclamation requirements. Planting and seeding in the fall prior to snowfall will improve likelihood of success of the efforts. The monitoring plans and reporting requirements will further ensure success of the site revegetation through *“Quantitative and qualitative monitoring of reclamation success would begin the first growing season after final reclamation is completed and would continue until success criteria are satisfied.”* (p. 2-113)

They have not only outlined how they intend to restore the environment surrounding the site but have also committed to making financial assurances that this work is done the right way by going above and beyond the normal standard for determining reclamation costs. Rather than simply setting aside a required flat fee per acre, they have said they will consider many factors in determining the actual cost it will take for a third-party contractor to complete restoration work as part of their financial assurance.

According to the supplemental draft EIS, the financial assurance that Perpetua has committed to would *“provide adequate funding to allow the Forest Service to complete reclamation and post closure operation, including continuation of any post closure water treatment, maintenance activities, and necessary monitoring for as long as required to return the site to a stable and acceptable condition in the event Perpetua was unable to do so”*(2.4.7.14). It appears your findings verify what Perpetua has indicated would be a higher level of commitment regarding their reclamation and restoration efforts at the site.

In addition, the ongoing operations throughout the project will help Idaho become a leader in developing a new, domestic supply of antimony, which is considered a critical mineral by the U.S. government due to its applications in the national defense, aerospace, and energy industries. Emerging technologies in these fields has led to a growing demand for minerals like antimony, according to the U.S. Geologic Survey (USGS); however, the domestic supply is extremely limited with no production of the mineral reported last year and only one processing facility in Montana that is able to produce miniscule amounts of antimony from recycled materials.

As a result, we are almost entirely dependent on importing antimony from other countries including China, Russia, and Tajikistan. Given the ever-changing political climate that can lead to disruptions in the supply chain, it is critical for America to be able to develop its own antimony resources, and the Stibnite mine is home to the largest-known deposit of this critical mineral in the United States. If the USFS issues a Record of Decision authorizing the Stibnite Gold Project, Idaho will become a

leader in antimony production while simultaneously strengthening our national security and reducing our reliance on other countries to meet our antimony needs.

It is important that the Forest Service accept the EIS under the 2021 MMP so that Perpetua can begin to address the numerous environmental problems of the past that still plague the region today while resuming production of this critical mineral. The last thing we can afford to do is to do nothing, which is why failure to conclude the permitting process or require additional studies prior to a decision should not be considered.

The Forest Service has completed its requirements under NEPA to identify alternatives and mitigations which reduce environmental impacts while still meeting the purpose and need of the project. The merits of the updated project are clearly noted in the letter accompanying the supplemental EIS, which states that “a further modified plan, known as the ModPRO2, reducing surface disturbance and anticipated environmental impacts, was submitted by the proponent” and warranted the SDEIS.

Again, thank you for this opportunity to provide comment. We also thank the Forest Service for selecting the MMP as the preferred alternative and request that the permitting process be concluded after the comment period with publication of a final EIS maintaining this selection. Thank you for your time and consideration of this important issue.

Sincerely,

A handwritten signature in black ink that reads "Bryan Searle". The signature is written in a cursive style with a large initial 'B' and a long, sweeping underline.

Bryan Searle, President
Idaho Farm Bureau Federation