



# CITY OF RIGGINS

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December 14, 2022

Linda Jackson, Payette Forest Supervisor  
USFS, Payette National Forest  
500 North Mission Street  
McCall, Idaho 83638

**RE: COMMENT LETTER ON STIBNITE GOLD PROJECT  
MMP WITH BURNTLOG ROUTE**

Dear Ms. Jackson:

The Riggins City Council has voted to approve the measures taken by the Stibnite Gold Project, with the understanding that the USFS will approve the Modified Mine Plan with Burntlog Route that includes appropriate measures that will (1) prioritize the protection of surface water and groundwater quality, (2) prevent contamination of the Salmon River and its tributaries with toxic waste such as arsenic, mercury, cyanide or antimony and most importantly, (3) provide adequate assurance that the tailing storage facility (TSF) will be designed and constructed so as to minimize the probability of failure (leak and breach).

There are risks inherent in any mining operation and we have had a number of concerns raised by members of our community about the Stibnite Gold Project. After reviewing these concerns with Bob Crump, a local resident, retired Physicist and our appointed representative to the Stibnite Advisory Council, we have been assured that the new Modified Mine Plan (MMP) addresses our concerns even better than Alternative 2 presented in the 2020 DEIS. Bob has ten years of experience as an Engineering Specialist performing probabilistic risk assessment (PRA) of nuclear power plants using tools such as fault tree analysis (FTA), accident sequence analysis (ASA) and failure mode and effects analysis (FMEA) while working at the National Engineering Laboratory in Idaho Falls and Gulf General Atomics in San Diego.

With the development of the Stibnite Advisory Council (SAC), the City of Riggins feels that our representative and the representatives from the other cities and counties are working hard to address any community concerns with regards to the Stibnite Gold Project. This past year, SAC has been discussing areas of concern regarding the transportation of sensitive loads along our local roadways and have asked Perpetua to consider joint training sessions to help our local fire, EMS and Sheriff department's learn how to address a potential hazardous material incident. Bob informed the City Council that the Stibnite Advisory Council (SAC) reviewed comments received during the 2020 DEIS comment period and based on those comments, SAC entered into an Independent Water Monitoring Program in 2021 with the University of Idaho to verify that the water sample results collected by Perpetua Resources were valid and verified by a third party and to date those results are consistent with what was shared by Perpetua.

The Stibnite Advisory Council had also asked for a third party independent analysis of the Tailing Storage Facility (TSF) to assure SAC that the TSF would be designed and constructed such that its failure (leakage or breaching) could be considered as non-events. This study was completed and shared at SAC's December meeting and indeed showed that the probability of TSF leakage or breaching was extremely low or essentially non-events.

The lifeblood of our community is solely based upon recreational activities on the Salmon River thus the USFS and permitting agencies must assure the following:

- 1) Legacy tailing will be reprocessed to remove mercury, arsenic and antimony that are currently contaminating Meadow Creek.
- 2) Burntlog Route will be utilized to keep truck traffic away from area streams as much as possible.
- 3) Make sure that at the end of the project, impoundment is appropriately de-watered and stabilized and that any of the water generated during the tailings consolidation process is appropriately treated prior to discharge.
- 4) The TSF will be designed/constructed such that there is minimal probability of leakage of impounded contents to groundwater due to the two different liners laid down on compacted soil, together forming what is termed a "composite liner." The first barrier applied is a Geosynthetic Clay Liner (GCL - sodium bentonite clay sandwiched between two layers of geotextile) which when coming into contact with water swells for a low permeability providing an effective hydraulic seal, and in this case equal to about 2.5 feet of compacted clay. The next liner, a linear low-density polyethylene (LLDPE) geomembrane, which has a half-life of approximately 450 years, is then applied on top of the GCL, constituting the second barrier to prevent tailing solution from seeping into the environment.
- 5) Ore processing will neutralize, stabilize or remove chemicals/heavy metals such as mercury, cyanide and arsenic as part of the processing cycle before any tailing materials are deposited into the TSF, further reducing risk of impacting water quality.
- 6) If trucks transport antimony concentrate through the City of Riggins, concentrate will be in appropriate enclosed containers (such as super sacks) to prevent dust emissions. Additionally, before antimony concentrate or any other toxic materials such as NaCN biscuits, mercury, etc is scheduled to be transported through the City of Riggins, emergency services personnel (Fire, EMS and Sheriff departments) will be notified prior to and trained on how to respond to transporting vehicle accidents.
- 7) A Hazmat Station shall be provided within 30 miles of Riggins to mitigate the risk of an accidental spillage of toxic wastes into the two rivers (Little Salmon River and Main Salmon) that roughly parallels Highway 95, the main route connecting north and south Idaho. The intent of this station is to provide a quick response with personnel, equipment and materials to quickly prevent and neutralize hazardous waste from entering the rivers. A Hazmat Team will be responsible for any spill that occurs along Highway 95 and the two rivers.
- 8) Perpetua Resources first priority will be the construction of the bypass tunnel so that anadromous fish and local fish populations will be able to access old spawning grounds after 80 plus years of no access.
- 9) The Supplemental Draft Environmental Impact Statement shall remain in effect throughout the duration of this project as stated. If Perpetua Resources sells or partners with another entity at any time through the completion as stated in the SDEIS, all of these terms and agreements shall remain in place for perpetuity.
- 10) With the new bonding requirements in place that Perpetua must bond for the actual costs of restoration, make sure those funds are set aside in bonds or trusts, do not allow corporate guarantees. Make sure Perpetua has no recourse but to restore the site after operations per the Stibnite Perpetua Resources Modified Mine Plan.

Thank you again for allowing the City of Riggins the opportunity to comment on such an important project for our region.

Sincerely,



Glenna McClure  
Mayor