

To: Linda Jackson, Payette Forest Supervisor, Stibnite Gold Project, 500 N. Mission Street, Building 2, McCall, Idaho 83638

Subject: Stibnite Gold Project (SGP) - Update of previous comments (12/20/22) on the SDEIS following a virtual meeting with representatives' of Perpetua Resources, Valley County, and various snowmobile groups.

Thanks to information from the folks above, our overriding comment at this point is to support the decision in the SDEIS to adopt the 2021 MMP. However even that option has a significant issue that we believe must be addressed. That issue is the closure of existing groomed snowmobile trail from Trout Creek to Wapiti Meadows during the construction phase of the SGP. In addition mine traffic during the construction period on the plowed Johnson Creek Road from Wapiti Meadows to Yellow Pine will make a poor situation worse without some mitigation. Currently this section involves some fairly small but undesirable safety conflicts between snowmobiles, and some operational problems for snowmobiles (mostly overheating from running on ice or bare road). This situation will become unacceptable if Mine Traffic is added to the situation without some compensating measures. It must be noted that shortcoming described above becomes **much worse** under the details of the Johnson Creek alternative in the SDEIS.

We wish we had a simple & straight foreword proposal to address our concerns listed above (but unfortunately not). We do believe that work done in 2005 by Kif Brown to address the issue on the Johnson Creek Road from Wapiti Meadows to Yellow Pine offers a workable, but partial solution to that issue.

Kif Brown proved that dual use of the Johnson Creek Road by snowmobiles & light wheeled traffic was very doable in 2005. A video of Kif's work was attached to our previous letter (12/20/22), and is also available at the following link: <https://drive.google.com/file/d/1wjkryb2a4dxswSKZon1XID5Dxkybl0lq/view?usp=sharing>. A copy of this video (on a CD) was given to Valley County shortly after the video was made. We travelled this dual function route several times in 2005.

It must be noted that Kif was using a standard ski hill groomer to make the snowmobile trail. The job he did would be much easier today using smaller snow grooming equipment that is now available – just google “ narrow trail snow groomer”

Kif's work was focused on just making the road work for both existing users. Kif did not take advantage of the fact that the power line road runs parallel to the Johnson Creek Road, and might be used as a groomed trail in locations where the existing road is too narrow for snowmobile & truck traffic. An example of where the power line road alternative would work well is the steep & winding section of the Johnson Creek Road just north of Ice Hole campground. In this section the power line road or something within the right-of-way would provide an alternative for snowmobiles with easy connections (flat ground) to the Johnson Creek Road on both ends.

The section of the Johnson Creek Road from Trout Creek to Wapiti Meadows is more complex, but dual use may be possible considering the relatively short construction period. Traffic management would have to be an important component of any plan for

dual use here. One example of traffic management has already been used on the Stibnite Road. In this case the mine created an attended check station at the road entrance. This attendant was kept informed of traffic on the road & advised the public of any oncoming traffic. Even temporary traffic signals could be employed such as those used on hwy 55 near Smiths Ferry in recent years

In the DEIS for the SGP one of the options given was a temporary groomed trail on the west side of the Johnson Creek Road – which if feasible would essentially solve the problem. In our virtual meeting on 12/21/22 some of those present discounted the feasibility of such a temporary groomed trail.

Another option proposed was using the Burnt Log Road for snowmobile access. Currently snowmobilers can ride the Burnt Log Road to the end although it is not groomed. It is a relatively short distance from the road end to the Thunder Mountain Road, and from there just a few miles back down to the Johnson Creek Road. The connection between the road ending & the Thunder Mountain Road will require some work (crossing Trapper Creek). The short distance down the Thunder Mountain Road has very deep rolling cross drains, and often these cross drains are very difficult to cross on a snowmobile. This option would be easy travel if groomed, but if not groomed not a route for inexperienced snowmobilers. From the intersection of the Thunder Mountain Road & the Johnson Creek Road the Power Line right of way offers a good option for a groomed snowmobile trail clear to Wapiti Meadows.

In summary, we believe the decision in the SDEIS for the Sibnite Gold Project to degrade or eliminate some existing grooming on the Johnson Creek Road during the life of the project is very short sighted.

We have not attempted to read every page of the SDEIS, but have scanned through & the only place we found reference to the status of Johnson Creek Road during the construction phase is on 2-4 & 2-5 (page 88-89 of SDEIS) and those pages don't make much sense to us.

We believe the proposal will likely have a serious negative economic impact on the Village of Yellow Pine & will strongly impact cabin owners and residents in YP & Big Creek. Three years of no snowmobile access to Yellow Pine will close the few remaining businesses that are open year round. If this proposal avoided truly significant financial costs for the mine or avoided any kind of environmental impact then the proposal would have some merit, but neither are true for this proposal. This proposal just negatively impacts businesses in Yellow Pine, Winter recreation activities & access to private property.

One final point - The proposal does not address the parking issue for BC home owners that will be forced to trailer to the Yellow Pine area during the construction phase. The existing parking at the Profile Creek Road has been marginal for past users & certainly will be grossly inadequate under this proposal – this proposal will result in winter

travelers to Big Creek trailering to the EFSF/Profile Creek Road intersection instead of snowmobiling from Warm Lake to Big Creek.

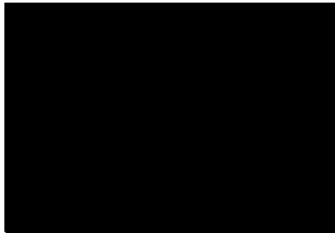
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