



EARTHWORKS

December 15, 2022

Ms. Linda Jackson
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RE: Stibnite Gold Project SDEIS Comment Deadline Extension Request

Dear Ms. Jackson:

I am writing to formally request an extension of the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS) comment period from the current 75-day allotment to 120 days - adding an additional 45 days for public review. Earthworks is a national non-profit organization dedicated to protecting communities and the environment against the adverse impacts of mineral and energy development. Our organization has been engaged in the permitting process for a number of years.

The Stibnite Gold Project Supplemental DEIS is an extraordinarily complex project for the public to review. We have been diligently reviewing the SDEIS to prepare comments, yet the process has been complicated by the myriad of changes in supporting documents and the challenges of reviewing these materials within the public comment timeframe, particularly when so much of the comment period has included major federal holidays – Veterans Day, Thanksgiving, Christmas, etc.

In addition to the issues that have been raised by other conservation organizations, we are also struggling to sort out discrepancies between references cited in the SDEIS and those available on the Forest Service website. Please see the draft list:

Table 1. Discrepancies between geochemistry and water quality references cited in the SDEIS and those available on the USDA Forest Service website.

As listed in SDEIS, Section 7.1 References	Available from USDA Forest Service website, Project Documents ¹
Brown and Caldwell. 2021b. Stibnite Gold Project Water Management Plan. Prepared for Perpetua Resources Idaho, Inc. October 2021.	Brown and Caldwell. 2021. Stibnite Gold Project Water Management Plan. Prepared for Perpetua Resources Idaho, Inc. <i>December</i> . 638 pgs. (more recent)
Brown and Caldwell. 2021c. Stibnite Gold Project. Environmental Monitoring and Management Program. Prepared for Perpetua Resources Idaho, Inc. May 2021.	Brown and Caldwell. 2021. Stibnite Gold Project Environmental Monitoring and Management Program. Prepared for Perpetua Resources Idaho, Inc. <i>September</i> . 64 pgs. (more recent)
Brown and Caldwell. 2021d. Stibnite Gold Project. Development Rock Management Plan. Prepared for Perpetua Resources Idaho, Inc. October 2021.	Brown and Caldwell, 2022. Final Development Rock Management Plan. Prepared for Perpetua Resources Idaho, Inc. <i>May</i> . 143 pgs. (more recent)

Dedicated to protecting communities and the environment from the adverse impacts of mineral and energy development while promoting sustainable solutions.

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As listed in SDEIS, Section 7.1 References	Available from USDA Forest Service website, Project Documents ¹
Not listed in SDEIS	Brown and Caldwell. 2021. Stibnite Gold Project Water Resources Monitoring plan. Prepared for Perpetua Resources Idaho, Inc. November. 50 pgs.
SRK Consulting (SRK). 2018b. Stibnite Gold Project Proposed Action Site-Wide Water Chemistry (SWWC) Modeling Report. Prepared for Midas Gold Idaho, Inc. December 2018.	SRK Consulting (SRK). 2021. Stibnite Gold Project ModPRO2 Site-Wide Water Chemistry (SWWC) Modeling Report. Prepared for Perpetua Resources Idaho, Inc. <i>October</i> . 558 pgs. (more recent)
SRK Consulting (SRK). 2021a. Stibnite Gold Project Baseline Geochemical Characterization Report – Phase 1 and Phase 2. Prepared for Perpetua Resources Idaho, Inc. December 2021. (not available on USDA website)	SRK Consulting (SRK). 2021. Stibnite Gold Project Comprehensive Baseline Geochemical Characterization Report. Prepared for Perpetua Resources Idaho, Inc. <i>November</i> . 3514 pgs. (not as recent but may be a more comprehensive report)
¹ https://www.fs.usda.gov/project/?project=50516 <i>Italics in the column to the right highlight the discrepancies in dates.</i>	

This has been time consuming work for us and our technical contractors, who are working as quickly as possible to review and provide comments. Although we appreciate the Forest Service’s prompt response when problems are identified, it doesn’t address the loss and lack of time available for a thorough public review of the SDEIS.

Hardrock mining is one of the most severe and lasting impacts to public lands, with impacts, particularly to water quality, that can continue in perpetuity. For these reasons, we urge the Forest Service to extend the public comment period.

Sincerely,

Bonnie Gestring
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Earthworks
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