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December 14, 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, in effect, adding an additional 45 days for the public to review the data analysis associated with this intricate and complex project proposal. Since 1973, the Idaho Conservation League (ICL) has worked to protect and enhance Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. The Idaho Conservation League has a long history of involvement with mining, and as Idaho's largest statewide conservation organization, ICL represents over 30,000 supporters who have a deep personal interest in ensuring that mining operations are protective of our land, water, fish, and wildlife. We have been engaged on the SGP since its inception over a decade ago.

The Stibnite Gold Project Supplemental DEIS is an extraordinarily complex project for the public to review. There is no other permitted use of our public lands that has such a dramatic and permanent impact on the landscape, soil, water and wildlife as large-scale mining. Even with restoration components, large-scale mining has significant, long term water quality effects and other negative impacts. An extended public comment period for a project of this size and complexity is consistent with the National Environmental Policy Act's (NEPA) purpose to ensure the public has informed access of and input into federal agency decision making on matters significantly affecting the quality of the human environment.

The need for an extended comment period becomes more poignant when one considers the massive amount of data the Forest Service, independent contractors, the mine proponent (Perpetua Resources), and the proponent's contractors have generated to inform the analysis for the proposed mine. When we began this review process, the Forest Service committed to providing additional documents or data that had not been included in the October 26, 2022 SDEIS release which we, and other organizations and/or members of the public, could request through the Deputy Forest Supervisor, Mr. Kevin Knesek. The Forest Service has been very responsive to those requests and we are grateful for the agency's commitment to the NEPA process. However, as we and our partners have delved into the SDEIS documentation, we have also found numerous *cited resources* that were not included in the original data upload to the project webpage.

We have documented **28 newly uploaded documents** since October 26th, 2022, and most of those are new materials uploaded post December 1, 2022. To put this into perspective, the comment period closes on January 10, 2023. This represents a 75-day comment period to review a 1,600 plus-page document with 19 Specialist Reports and numerous supporting documents. That was prior to the Forest Service providing the previously mentioned missing cited reports and/or data. Further, the Forest Service set the comment period for a calendar space that contained 4 Federal holidays and dates important to numerous cultures, including Thanksgiving, Christmas, Hanukkah, Kwanzaa, Winter Solstice, and New Year celebrations. We believe it is both impractical and unreasonable for the Forest Service to expect to receive thoughtful and relevant feedback for the SGP without allowing additional time to review newly available information.

The 28 documents that have been uploaded (upload date provided in parentheses) since October 26, 2022 are:

- Site Specific Seismic Hazard Assessment (November 18)
- Air quality Analysis (November 29)
- Midas Gold Far-Field Air Quality Impact Analysis Protocol for Stibnite Gold Project, Technical Memorandum (November 29)
- Unpaved Road Dust Control Efficiency from Chemical Suppressants Technical Memorandum (November 29)
- Stantec Access Road and Ambient Air Boundary Applicability memo (November 29)
- Stibnite Gold Project Air Quality Analysis Addendum ModPRO2 (November 30)
- Stream Functional Assessment (December 2)
- Stream Design Report (December 8)
- Stibnite Gold Project Supplemental HAP Air Quality Analysis Addendum ModPRO2 (December 9)
- Fish Passage Barriers Critical Habitat Intrinsic Potential and Occupancy Model Impacts (December 9)
- Stream Temperature Impacts on Fish: Chinook Salmon, Steelhead Trout, Westslope Cutthroat Trout and Bull Trout (December 9)
- Intrinsic Potential Model Chinook salmon and Steelhead (December 9)
- Chinook Salmon Flow-Productivity Analysis (December 9)
- Appendix J-6, Chinook Salmon Critical Habitat Technical Memorandum (December 9)

- Habitat Occupancy Model Westslope Cutthroat Trout and Bull Trout Alternative 1 (December 9)
- Appendix J-9, Bull Trout use of Lake Habitat Technical Memorandum (December 9)
- Summary of Existing Phabsim Data to Inform Impacts on Westslope Cutthroat Trout and Bull Trout (December 9)
- Isaak et al., 2017; Big Biology Meets Microclimatology.... (December 9)
- Stibnite Gold Project Supplemental HAP Air Quality Analysis Addendum ModPRO2 (December 9)
- 2021 Modified Mine Plan Chinook Salmon Flow-Productivity Analysis (December 13)
- 2021 Modified Mine Plan Fish Passage Barriers (December 13)
- 2021 Modified Mine Plan Stream Temperature Impacts (December 13)
- 2021 Modified Mine Plan Steelhead Flow-Productivity Analysis (December 13)
- 2021 Modified Mine Plan Phabsim Analysis (December 13)
- Maret et al., 2006, Inflow Stream Characterization of Upper Salmon River Basin Streams, Central Idaho, 2005 (December 14)
- Hydrology Field Survey for Golden Meadows Project (December 14)
- Final Stibnite Gold Project Stream and Pit Lake Network Temperature Model Existing Conditions Report (December 14z0)
- Stibnite Gold Project Stream and Pit Lake Network Temperature Model Proposed Action and Proposed Action with Modification Report (December 14)

As you will see in this extensive list, only two of the requested materials were References Cited that our reviewers wished to read in the original (Isaak et al, 2017 and Maret et al., 2006). The remaining 26 documents are intrinsic and crucial to the analysis of the SGP and should have been included in the original file upload on October 26, 2022.

As I mentioned earlier, we do appreciate the Forest Service's willingness to respond to our data requests and to have follow up conversations with ICL and our partners. We also appreciated the agency giving its specialists several months of additional time to work through the complexities of SDEIS until the document was ready for public review. We now ask that you extend that same courtesy to the public by providing a 45-day extension to the comment period. This will give members of the public reasonable time to review the SDEIS and provide meaningful and relevant comments and recommendations to the agency. Thank you for your kind consideration and I look forward to hearing from you soon.

Respectfully submitted,



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Cc: Kevin Knesek, Deputy Forest Supervisor
Brian Harris, Public Information Officer