



Linda Jackson
Payette Forest Supervisor
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Ms. Linda Jackson,

IMCO Construction is a nationally recognized and award-winning construction firm offering procurement, design-build, planning, and construction services to a diverse group of clients throughout the northwestern United States. On behalf of IMCO, I am pleased to provide these comments on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement, as released on October 28th, 2022. IMCO urges the USFS to issue a final EIS and positive Record of Decision authorizing construction of the Stibnite Gold Project under the Modified Mine Plan Alternative.

IMCO was selected by the USFS, EPA, and Perpetua resources as the lead contractor to implement the 2022 Stibnite cleanup actions occurring under the Administrative Settlement Agreement and Order on Consent. IMCO Construction specializes in environmentally sensitive construction projects, working in remote locations for clients throughout Washington, Idaho, Oregon, Montana, and beyond. From pre-construction through commissioning and operation, IMCO brings collaborative solutions and strong teamwork rooted in the core values of integrity, excellence, and family, and a relentless commitment to safety.

These core values are also fundamental to Perpetua Resources and have enabled the company to operate successfully in the Payette National Forest for over ten years without significant spills, safety incidents, or negative impacts to the environment or local communities. This strong performance record attests to Perpetua's ability to successfully construct and operate the Stibnite mine thereby bringing economic benefits to local communities and improving environmental conditions on the Stibnite Site through its concurrent and post-closure restoration and reclamation activities.

As documented in the technical and scientific analysis in the SDEIS, the Stibnite Gold Project under the 2021 MMP Alternative will result in a suite of environmental improvements for the site, including:

- Positive benefits to Salmon and Steelhead due to removal of fish barriers, particularly addressing the fish barrier at the Yellow Pine pit (Section 4.12)
- Engineering design measures and other activities to "reduce the potential for release of leached chemicals to surface water and groundwater, specifically surface water diversions and use of engineered liners and covers" (p. ES-14)
- Removal of legacy mine waste and placement in engineered facilities which would "improve some of the existing water quality conditions observed in Meadow Creek and the East Fork SFSR" (ES-16)
- Net improvements in surface water quality (Section 4.9)



As the lead contractor on the 2022 ASAOC cleanup work, our team has firsthand experience of the difficulty of accessing the site along the Johnson Creek-Yellow Pine Route. Mobilizing equipment and materials to Stibnite along this route posed numerous challenges and environmental risks. The steep and narrow grades on the Johnson Creek route posed a safety risk for our staff and contractors. These risks would be greatly mitigated by construction and use of the Burnt Log Route, included under the 2021 MMP alternative. IMCO supports the agency conclusion that the Burnt Log Route is preferred as it “reduces the potential for impacts associated with access, transportation and hazardous materials” along Johnson Creek and the East Fork SFSR (p. ES-6).

The environmental design features proposed by Perpetua and outlined in Section 2.4.9 of the SDEIS will effectively mitigate many of the risks to the environment associated with operations and transportation. A strong culture of safety and environmental stewardship amongst Perpetua’s field staff have been proven effective in ensuring safety of workers and the environment.

Many of the management plans and operational procedures to be followed during the mining operation are already in place on site and have been proven effective in mitigating potential transportation and construction related risks.

Perpetua maintains a comprehensive SPCC plan which outlines engineering and management controls designed to prevent and mitigate damage to the environment from fuel and chemical spills. Additional measures beyond what is required under the Forest Plan, such as transport of process reagents in rollover proof steel tanks and transport of solid cyanide briquettes will greatly reduce consequences of a spill, should it occur.

Adherence to the environmental protection measures and company culture valuing employee, public and environmental safety, have been widely successful in preventing spills, safety incidents, and environmental degradation during the 12 years of Perpetua’s operations at Stibnite.

IMCO urges the Forest Service to publish the Final EIS and issue a Record of Decision authorizing the project and allowing for comprehensive restoration of the site, critical mineral production, and economic development.

Sincerely,

Ashley Kimberley
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