

Thank you for the opportunity to provide feedback on the Stibnite Gold Project (SGP) as part of the public permitting process. The SGP has been through an extensive review under the National Environmental Policy Act (NEPA) and is subject to numerous state permits that govern all aspects of the environmental impact of the project. Critics have argued that the NEPA process is inadequate because it does not definitely establish that the SGP will have no adverse environmental effects. However, NEPA is not intended to be a guarantee of future outcomes. Instead, it is intended to "ensure[ing] that agencies consider the significant environmental consequences of their proposed actions and inform[ing] the public about their decision making." EPA Citizen's Guide to NEPA, <https://ceq.doe.gov/docs/get-involved/citizens-guide-to-nepa-2021.pdf>. The Council on Environmental Quality (CEQ) NEPA implementing regulations expressly state: "Environmental impact statements shall not be encyclopedic." 40 C.F.R. Sec. 1502.2(a). Moreover, the CEQ regulations also state that: "Environmental impact statements shall discuss impacts in proportion to their significance. There shall be only brief discussion of other than significant issues. As in a finding of no significant impact, there should be only enough discussion to show why more study is not warranted." Id. at 1502.2(b). The Supplemental Draft EIS prepared by the Forest Service fully meets these requirements.

The proposed revisions to the SGP made by Perpetua Resources following the comments on the initial draft EIS reflect the efforts of the company to adapt the project proposal to address and mitigate the potential environmental impacts identified in the DEIS. This is exactly how the NEPA process is intended to function. As the site has an extended period of prior operations, for which Perpetua Resources has no responsibility, [including production of antimony that was essential to the United States' success in World War II], the potential environmental effects are appropriately evaluated in the context of existing conditions, as required by NEPA. The analysis clearly demonstrates that the SGP will significantly improve environmental conditions at the site. These improvements would not occur without Perpetua Resources' investment of risk capital in and use of operating revenues from the SGP. The Forest Service, EPA, and the U.S. Military have done nothing to address these issues over the past decades. The State of Idaho, similarly, has other priorities for its limited financial resources. Approving the SGP will result in improved environmental conditions at the site. Perpetua Resources has demonstrated its commitment to its promise to improve current conditions by undertaking actions to address contamination coming from outside the SGP footprint before approval of the SGP by the Forest Service.

Perpetua Resources also has demonstrated its good faith by engaging with the local communities in the project vicinity and the Nez Perce and Western Shoshone tribes. These communities have long-term interests in the area. Input from the communities during SGP operations offers the opportunity to further enhance the environmental benefits of the SGP.

As the war in Ukraine has made abundantly clear, the United States is dangerously reliant on foreign and adversarial sources of critical minerals such as antimony. The recent decision by the United States Air Force Research Laboratory to award a Technology Investment Agreement of up to \$24.8 million under Title III of the Defense Production Act to the SGP confirms that the United States considers the SGP to be a project essential to the security of the country.

I urge you to accept Perpetua Resources' plan as outlined under the 2021 Modified Mine Plan and to issue an affirmative record of decision approving the SGP as soon as feasible.

David Deisley