



# MINING MINNESOTA™

RESPONSIBLE DEVELOPMENT  
of NATURAL RESOURCES

Submitted Electronically To:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=50516>

January 6, 2023

U.S. Forest Service, Payette National Forest  
Attn: Linda Jackson, Payette Forest Supervisor  
Stibnite Gold Project  
500 North Mission Street, Building 2  
McCall, ID 83638

**RE: Comments on the Payette and Boise National Forests' Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project**

Dear Ms. Jackson:

On behalf of MiningMinnesota, I am submitting these comments on the Supplemental Draft Environmental Impact Statement (SDEIS) that the Payette and Boise National Forests (Forest Service) has prepared for Perpetua Resources Ltd.'st (Perpetua's) Stibnite Gold Project (SGP) in Valley County, Idaho. MiningMinnesota is a diverse coalition of organizations, companies, and individuals that support sustainable and environmentally responsible non-ferrous mining in Minnesota. MiningMinnesota's mission is to provide the facts about modern mining and how today's stringent regulations provide comprehensive environmental protection at modern mining operations. It is clear from reviewing the SDEIS that the SGP will be a highly regulated mine that will use effective, state-of-the-art environmental safeguards to protect the environment.

Minnesota is home to minerals essential for clean energy including copper, nickel, cobalt, and platinum group metals. We are therefore very interested in the critical minerals aspect of the SGP and Perpetua's proposal to redevelop the Stibnite Mine where the U.S. federal government produced antimony and tungsten during World War II and the Korean War. We applaud Perpetua for developing a visionary plan to remine and reprocess legacy tailings to recover the residual antimony from these materials and at the same time remediate some of the environmental problems associated with legacy mine wastes that are contributing contaminants to area streams and old mine structures that are blocking fish migration. Based on the detailed information presented in the SDEIS, the SGP is truly a win-win for the environment and nearby communities.

We note that re-mining legacy mine wastes to produce critical minerals like antimony is exactly in alignment with the directive in the White House's June 2021 report "Building Resilient Supply Chains, Revitalizing American Manufacturing, and Fostering Broad-Based Growth<sup>1</sup>," which directed the Secretaries of Agriculture and the Interior to evaluate reprocessing mine wastes as a viable source of critical minerals. Because the reprocessing of legacy tailings at the SGP to recover gold and antimony may be the first project to demonstrate the viability of the Administration's critical minerals re-mining/reprocessing concept, we urge the Forest Service to finalize its evaluation and authorize the SGP as quickly as possible so the SGP can demonstrate how re-mining and reprocessing some legacy mine wastes can recover critical minerals while concurrently remediating the impacts from past, unregulated mining practices.

We understand from Perpetua's August 2021 press release<sup>2</sup> that some of the antimony produced from the SGP will be provided to Ambri Inc., which will use it to manufacture advance-stage liquid metal storage batteries that utilities will be able to use to store energy from renewable energy generation facilities.

In addition to this important clean energy application, antimony is essential to the U.S. military as is evident from the U.S. Department of Defense's recent announcement that it has awarded Perpetua up to \$24.8 million in a Title III Defense Production Act (DPA) grant to help "complete environmental and engineering studies necessary to obtain a Final Environmental Impact Statement, a Final Record of Decision, and Other Ancillary permits for the SGP<sup>3</sup>" According to this announcement, the SGP contains "the sole domestic geologic reserve of antimony that can meet Department of Defense (DoD) requirements." The DoD announcement includes other statements that underscore the national security importance of this project:

"This investment is essential to ensure the timely development of a domestic source of antimony trisulfide for the manufacture of small arms and medium caliber cartridges, as well as many other missile and munition items."

"This action reinforces the Administration's goals to increase the resilience of our critical mineral supply chains while deterring adversarial aggression."

The Forest Service's SDEIS is based on an enormous amount of baseline data and sophisticated modeling to evaluate impacts to surface water and groundwater, air quality, and to other environmental resources. The socioeconomic impact analysis is similarly thorough and uses the widely accepted IMPLAN assessment methodology to evaluate the socioeconomic impacts from a proposed project. MiningMinnesota is confident that the comprehensive environmental impact analysis in the SDEIS satisfies the National Environmental Policy Act requirements for federal agencies to take a hard look at how a proposed project will impact the environment.

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<sup>1</sup> <https://www.whitehouse.gov/wp-content/uploads/2021/06/100-day-supply-chain-review-report.pdf>. This report was prepared in response to President Biden's February 24, 2021 Executive Order 14017, "On America's Supply Chains."

<sup>2</sup> <https://www.investors.perpetuaresources.com/investors/news/2021/perpetua-announces-antimony-supply-agreement-for-ambri-battery-production>

<sup>3</sup> <https://www.defense.gov/News/Releases/Release/Article/3249350/dod-issues-248m-critical-minerals-award-to-perpetua-resources/>

We are especially impressed with the 11-page list in Table 2.4-13 of the voluntary Environmental Design Features (EDFs) that Perpetua will use at the SGP. The EDFs go beyond the state and federal regulatory requirements and are designed to avoid impacts or minimize them as much as possible.

Together, the federal and state requirements listed in Table 2.4-12 and Perpetua's EDFs itemized in Table 2.4-13 demonstrate that the SGP will be a highly regulated operation that will be designed, built, operated, and closed with numerous environmental safeguards and monitoring systems. There can be no doubt that the Forest Service, the Idaho State regulatory agencies, and Perpetua have worked constructively together to develop an environmentally sound project that will minimize adverse environmental impacts, achieve numerous environmental and socioeconomic benefits, and supply the U.S. with a critically important domestic source of antimony.

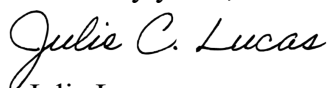
The many benefits of the SGP include:

1. Using private-sector resources to substantially improve water quality at a legacy mine site;
2. Eliminating mining features that have obstructed fish migration for over four decades and reconnecting/reconstructing the East Fork of the South Fork of the Salmon River to enable volitional fish migration for the first time in over 80 years;
3. Producing antimony for cutting-edge storage batteries clean energy applications;
4. Providing the U.S. military with a unique, domestic source of antimony that meets the military's technical specifications for national defense applications;
5. Creating thousands of direct, indirect, and induced jobs for at least two decades;
6. Generating substantial tax revenues for local and state governments as well as paying federal taxes; and
7. Sharing the mine's profits with local communities pursuant to the Stibnite Foundation agreement to provide these communities with the resources necessary to ensure sustainable benefits after mining is completed.

Based on this impressive list of environmental, ecological, and socioeconomic benefits, MiningMinnesota urges the Forest Service to authorize the SGP as quickly as possible in 2023. There are no viable reasons to delay this project of national importance.

Thank you for this opportunity to provide comments on your Draft EIS.

Sincerely yours,



Julie Lucas  
Executive Director