

Mrs. Linda Jackson,

I am writing to urge the USFS to issue a final EIS and positive ROD for the Stibnite Gold Project. I wish to commend the Forest Service on the comprehensive documentation of the Stibnite Gold Projects' potential benefits and impacts summarized in the October 28th Supplemental Draft Environmental Impact Statement.

As an active member of the Idaho mining community, with extensive mine development and permitting experience, I have participated in development of numerous environmental impact statements and recognize the quality of the document and underlying environmental analysis.

As the previous Office Manager and Senior Technical Expert for Hayley and Aldrich, I have had significant involvement in the development and support of all aspects of mine design and permitting in southeast Idaho and which gives me a quite diverse and well qualified to comment on the adequacy of the document and supporting analysis.

I am currently the permitting manager for Idaho Integra Gold Resources and have closely followed the development of the Stibnite Gold Project from its conception (PRO) and initial DEIS (ModPRO), to its current manifestation as the 2021 Modified Mine Plan alternative assessed in the Supplemental DEIS. I applaud the USFS and Perpetua for addressing community and stakeholder concerns by re-designing and modifying critical aspects of the mine plan to properly mitigate potential environmental impacts, thereby achieving the requirements of NEPA. This project plan is noted by the Forest Service in its cover letter to reduce surface disturbance and anticipated environmental impacts of the project relative to prior plans. The Forest Service's selection of the MMP alternative is well supported based on the key metrics noted throughout the document including incorporation of water management and enhanced closure activities, measure to manage stream temperatures and reduced potential for impacts associated with access, transportation and hazardous materials.

Much of my experience has been in mine-planning, closure design and applying critical thinking to the areas of mine-impacted water management. Perpetua's updated project is an exemplary demonstration of the application of modern mining practices and closure principals to realize improved water quality conditions on the Stibnite Site. Surface water quality is important for healthy and sustainable aquatic ecosystems, especially in areas with anadromous fish. The water quality analysis section of the SDEIS outlines significant improvements to surface waters on site, including significant reductions in metals contamination, chiefly antimony and arsenic. These water quality improvements, as shown in Tables 4-9-18 to 4-9-21 and on supporting figures, result from both the mine waste reclamation activities of the Stibnite project, and the updated closure plans developed through the NEPA comment process. Placement of geosynthetic covers is a proven closure practice to reduce meteoric infiltration through waste rock dumps and will effectively limit seepage upon closure. The benefits of this plan are clearly documented in the analysis, however, these are not stated clearly in summary information in the executive summary or even in the water quality analysis section itself. Instead, the document describes the surface water quality as "comparable" to existing conditions. The document also states that the plan would have direct impacts on water quality as it would contribute new sources of mine waste to the drainage. These statements do not appear to be supported by the underlying analysis, which shows overall improvements to surface water quality both within and downstream of the mine site.

The document also highlights the potential for inundated waste rock to leach metals into the underlying alluvial aquifer prior to closure and draindown of the dumps with water quality criteria exceeding the strictest potentially applicable water quality standards. This is noted several times throughout the executive summary and water quality analysis section, which collectively suggest to the public that the mine operations will somehow be in violation of applicable statutes. In Idaho, groundwater protection programs are administered by the IDEQ under the Idaho Ground Water Quality Rule which requires management to maintain or improve ground water quality through the use of best management practices and methods to the extent practical, and that discharges of groundwater to surface water does not impair the use of surface water (IDAPA 58.01.11). The closure plan in the MMP, specifically placement of engineered covers on dumps and backfilled pits, represent practical methods to mitigate these impacts. As noted above, the water quality modeling in the SDEIS demonstrates overall improvements to surface water quality on site. The modeling accounts for groundwater-surface water connectivity based on the site hydrological model. Additionally, the point of compliance downgradient of the site eliminates the need to meet groundwater quality criteria within the mine-area. The document does a good job of noting that water quality in receiving aquifers already exceeds standards across the site, but could be further improved if the groundwater impacts from dump seepage were clearly described as being consistent with state regulations under IDAPA 58.01.11, and placed in the context of overall improvements to surface water quality.

Overall, the analysis in the SDEIS is comprehensive and meets the requirements for public disclosure and identification of measures and alternatives to reduce environmental impacts of the proposed action. I suggest that the final EIS improve discussion and presentation of the overall net-positive environmental benefits of the project, including surface water quality projections, benefits to anadromous fisheries and economic stimulus offered through job creation and local project expenditures. The Forest Service should issue a final EIS and ROD authorizing the project without haste to realize these positive benefits for Idaho.

Sincerely,

Robert Mullener