



HALEY & ALDRICH, INC.
505 W. Riverside Avenue
Suite 205
Spokane, WA 99201
509.960.7447

9 January 2023

Payette Forest Service
Forest Supervisor Jackson

Subject: Support of the Stibnite Gold Project

Dear Payette Forest Supervisor Jackson:

I am writing to express support for Perpetua's Stibnite Gold Project and to provide comments on the Supplemental Draft Environmental Impact Statement (SDEIS) documents prepared by the Forest Service (FS). I am a Registered Professional Environmental Engineer with nearly 30 years of experience working around legacy abandoned mine lands (AML) in the Pacific Northwest. A large portion of that experience has been representing the FS throughout Oregon and Washington with CERCLA Removal/Remedial Actions. I have a deep understanding and appreciation surrounding the challenges we face regarding legacy mining issues that impact our communities and environment.

I wish to express my gratitude for the opportunity to provide comments on the EIS document. The document is comprehensive and represents a significant body of technical analysis on an extremely complex mining project meeting the requirements of the National Environmental Policy Act. The selection of the 2021 MMP alternative by the FS is well justified by the benefits this alternative offers relative to the Johnson Creek access route alternative and the no-action alternative. As demonstrated in the SDEIS, the Stibnite Gold project offers a suite of environmental restoration and reclamation actions resulting in improved scenic, habitat and water quality conditions on the site which can only be realized through timely permitting of the Stibnite Project. I encourage your agency to complete the permitting process by issuing a final EIS and Record of Decision (ROD) as soon as possible.

The reclamation and restoration projects inherent in the Stibnite Gold Project, especially addressing legacy AML issues are what really sets this project apart. Perpetua's overarching goal in design of the project has been focused on restoration of the Stibnite mining district, and the company has planned and designed the mining operations and site closure with this goal in mind from the inception.

Comprehensive cleanup of legacy mine wastes on the site achieved through private investment is the most notable aspect of the project. The extensive mining wastes present on the site exceed 10 million tons of materials and include tailings and waste rock, all of which currently contribute impaired water quality conditions, as appropriately noted in the SDEIS. Prior cleanup activities by various agencies have really only employed "band-aid" solutions. Perpetua's plan to relocate historical mine waste materials to engineered waste rock facilities and reprocess historical tailings is the mining-scale solution required for the site and will successfully mitigate many of the current issues. Placement of spent ore materials in the tailings starter dam beneath the liner and use of engineered geosynthetic cover systems into the closure plan are solutions which have been shown effective in reducing infiltration and associated

impacts to groundwater and surface water systems. Surface water and contact water management and treatment actions proposed during operations will effectively prevent additional contamination prior to facility closure. The proposed closure and reclamation plans have been successfully implemented at other site on FS-administered lands. Specifically, the Azurite Mine and the Monte Cristo Mining Area in Region 6 are two examples of successful closure that I have personally worked closely with the FS.

In addition to addressing mine wastes on site, the project includes extensive stream restoration measures which are shown in the SDEIS to result in a net benefit to salmon and steelhead, as well as provide local benefits to cutthroat trout. Perpetua has hired experienced stream restoration consultants to specify industry leading restoration practices with an emphasis on creating geomorphologically appropriate channel and habitat conditions conducive to functioning fisheries. These designs will result in an overall improvement in existing habitat. The removal of the fish barrier at the Yellow Pine pit and operation of the fish passage tunnel around the pit during operations will reconnect tens of kilometers of existing and improved spawning habitat, resulting in a net benefit to ESA species.

The closure plans for the project also employ best practices design measures including stockpiling and salvage of topsoil, and use of amendments to increase the volume of reclamation materials needed for closure. Certain conservation groups quoted in the media, such as ICL, have focused on the reclamation material deficit identified in the SDEIS as a major issue. It should be noted that there is currently a significant deficit of topsoil on the site in disturbed areas due to unregulated mining activities and that Perpetua has proposed to bulk up existing topsoil by blending and amending with compost and woodchips to address the shortfall. This approach will be effective and better than leaving the site as it is today.

The net-environmental benefits from cleanup and restoration of the site, as well as bringing jobs and economic benefits to Idaho, warrant prompt completion of the permitting process for the Stibnite Gold Project. In my nearly 30 years of experience working around legacy AML sites on FS-administered lands, rarely does an opportunity present itself that is truly a win-win for the stakeholders. The Perpetua Stibnite Gold Project does that. Through their vision and leadership, Perpetua has assembled a high-level team of dedicated professionals that has provided a technically sound, robust, well thought out approach to reclamation and closure of the project. Thank you for considering my comments on the SDEIS and I urge timely issuance of a positive ROD authorizing the project.

Sincerely yours,
HALEY & ALDRICH, INC.



Dustin G. Wasley, PE
Principal