



700-838 WEST HASTINGS ST

VANCOUVER, BRITISH COLUMBIA

V6C 0A6

Payette National Forest Supervisor-

Stallion Gold, a precious and critical metals exploration company, is submitting these comments on the Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project, published by the U.S. Forest Service (USFS) on October 28, 2022. Stallion Gold (Stallion) has closely followed the advancement of the Stibnite project and commends the USFS for advancing the project through the U.S. permitting process with publication of a comprehensive impact assessment document supported by science-based environmental analysis. Stallion appreciates the opportunity to provide comments on the document through the National Environmental Policy Act (NEPA) permitting process.

Stallion Gold has 100% ownership of 699 unpatented federal mining claims in Valley County covering 5,817 hectares. The Horse Heaven Project is located immediately west of Perpetua's claim block and east of Johnson Creek, and is situated on lands administered by both the Boise and Payette National Forests. As Perpetua's "neighbor," Stallion has closely monitored progression of the Stibnite Project from the Initial Plan of Operations ("PRO") through the "ModPRO" assessed in the August 2020 DEIS, and now currently under consideration as the 2021 Modified Mine Plan Alternative (MMP) in the Supplemental DEIS. This process has been on-going for over six years and has included the development of three mine plans by Perpetua, each progressively more protective of the environment, and publication of two EIS documents by the USFS, each increasingly comprehensive in detailing the thorough analysis performed in assessment of Stibnite project's restorative and community benefits.

Through this process, both Perpetua and the USFS have worked to solicit public feedback and thoroughly analyze proposed actions to identify potential environmental and social shortcomings of the mine plan. The modifications inherent to the MMP Alternative represent a much-improved project which offers significant environmental protections relative to Alternatives analyzed in the DEIS, or the Johnson Creek Alternative in the Supplemental DEIS. The USFS summarizes these improvements and projected benefits as entailing the following:

- Incorporates water management and closure activities to reduce the duration of long-term water treatment requirements.
- Incorporates measures to manage stream temperatures.
- Reduces the potential for impacts associated with access, transportation, and hazardous materials on Johnson Creek and the East Fork SFSR downstream of the Operations Area Boundary.

Stallion Gold fully supports the USFS Alternative selection for the reasons stated above and urges the USFS to promptly complete the permitting process for the Stibnite Gold Mine by issuing a final EIS and a positive ROD authorizing construction.

In addition to offering general support for Stibnite project, Stallion is providing detailed comments on the combined effects analysis sections of the SDEIS document, in which Stallion's Horse Heaven project

is deemed a Reasonably Foreseeable Future Action (RFFA), as in Table 5.1-2, p. 5-8. Stallion first submitted a plan of operations to the Boise National Forest in Sept, 2021, which is currently in the review phase.

First and foremost, the Horse Heaven exploration project is inconsistently described in the EIS document. While most of the document correctly presents that Horse Heaven is an exploration project, Section 5.21.2 describes the project as the “Stallion Gold Horse Heaven mining project.” Stallion Gold is an exploration focused company, not a mine development company and no mine plans have been submitted, nor have ore-resources or reserves been sufficiently established to support future plans for economic development.

The distinction between mining and exploration is generally poorly understood by both the public and by many state and federal regulators. Exploration programs have more in common with installation of domestic water wells or geotechnical assessment for road construction than any sort of mining operations. The fact that mineral exploration is a precursor to mining does not warrant portrayal of exploration drilling as mining. This would be akin to confounding land surveying work with construction of a housing development – they are simply not the same. The Forest should properly distinguish between mining and exploration projects in the document.

Stallion also disagrees with the impact assessments included in the RFFA discussion. The limited surface exploration activities proposed by Stallion at the Golden Gate area of its property would entail limited use of existing roads and limited exploration drilling. Stallion has worked closely with the Boise National Forest in designing an exploration program which will reduce and eliminate environmental and traffic related disturbances including drill siting from existing roadways, containment of drilling fluids, robust hole abandonment procedures, public traffic management measures, wildlife protection measures and hazardous materials safety and spill prevention procedures.

The projected effects stated in the Supplemental DEIS vastly overstate the potential impacts of the company’s current proposals. The Horse Heaven Exploration project as a RFFA, is projected to further deplete ore reserves (Section 5.2.2), increase traffic on the Stibnite Road (5.2.2), effect cumulative GHG emissions (5.4.1), increase disturbance to soil resources (5.5.2 and 5.23.3.1), effect surface and groundwater systems within its watershed (5.8), cumulatively contribute to water quality impacts within the CEA (5.9), impact vegetation resources resulting in loss of habitat (5.10), impact fisheries and aquatic habitat (5.12), cause cumulative surface water impacts through accidental spills (5.12), impact land use and management (5.15), effect historic properties through construction or drilling (5.17.1), impact scenic resources through modification of backcountry landscapes (5.20.2), effect wilderness character and inventoried roadless areas (5.23), increase spread of non-native plant species (5.23.3.1), and finally, impact solitude through generation of noise (5.23.3.1).

This effects analysis would be applicable to a large-scale mining operation similar to the Stibnite Gold Project, but is not reasonably supported or justified for a small-scale exploration drilling program with no new surface disturbance utilizing existing roadways and incorporating water quality, noxious weed and wildlife protection measures. The Supplemental DEIS would be improved if only those impacts potentially applicable to the exploration project, notably effects on transportation and access deemed “negligible” in the document (5.16.1), or likely economic benefits (5.21.2) were retained. Unjustified assertions that the exploration project will have the same effects as a mining operation; especially soil disturbance, modification of backcountry landscapes or effects to roadless areas are simply not appropriate for our current PoO which does not entail new surface disturbances.

In conclusion, while Stallion disagrees with some of the potential impacts associated with the Horse Heaven exploration project as a RFAA, overall the company feels that the Supplemental DEIS document is a thorough and comprehensive analysis of the Stibnite Gold Project which assesses project alternatives, considers public comments and clearly conveys the potential environmental impacts. Furthermore, the selection of the 2021 MMP Alternative is appropriate given its environmental benefits. In order to realize the environmental restoration, economic and North American critical mineral production benefits of the project, the Forest Service should work to complete the permitting process by issuing a positive ROD for the Stibnite project supported by a final EIS as soon as practicable.

Sincerely,

Drew Zimmerman

CEO, Stallion Gold Corp.