



January 4, 2023

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

RE: Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project

Ms. Jackson,

I am pleased at the opportunity to provide comments on Perpetua's Stibnite Gold Project and the Supplemental Draft EIS prepared by your Forest. As noted in the draft EIS, this project brings considerable economic opportunities to Idaho and the US and offers the potential to improve domestic security and resilience through onshore production of the critical mineral antimony.

Mining is literally the bedrock of Idaho's history; the state was populated during the gold rush and has been a significant producer of precious metals, critical minerals, and commodities vital for our domestic productivity for over a decade. As the Corporate Operations Manager at Itafos Conda, one of Idaho's leading phosphate producers, I understand the importance of mining to Idaho's local communities and economic wellbeing. I am an Idaho native and hold a Business degree from ISU. I am also acutely aware of the necessity of functioning domestic supply chains to ensure economic prosperity. These are the primary reasons that the USFS should approve the Stibnite Gold Project under the 2021 Modified Mine Plan Alternative. This alternative offers environmental protections and mitigates impacts while still meeting the purpose and need for domestic production of critical and precious metals and minerals.

In recent years, global supply chains have undergone significant disruptions, initiating with the global COVID pandemic, and exasperated by the Ukrainian invasion and COVID lockdowns imposed in the Peoples Republic of China. Furthermore, the passage of the sweeping rules by the US department of commerce limiting import of Chinese semiconductors points to a perfect storm brewing for restrictions on the import of critical and strategic minerals.

The stibnite mine will produce – wait for this – stibnite, a critical and strategic mineral, and primary ore of antimony - Sb_2S_3 . The USGS defines critical minerals as “non-fuel mineral or mineral material essential to the economic or national security of the U.S. and which has a supply chain vulnerable to disruption.” Currently, most of the world's antimony is produced by Russia, China, and Tajikistan, making it increasingly vulnerable to federally imposed import restrictions or European war-related supply disruptions. This critical commodity is used in an array of consumer products as a flame retardant, has potential for grid scale energy storage systems, and is an important component of munitions primers. These latter two uses for antimony have spurred interest and investment in the Stibnite project by

Ambri, a battery developer; and the Department of Defense, to ensure domestic supply of this critical mineral.

Project detractors are trying to discredit the significance of the potential antimony production from the Stibnite mine. These observations overlook the significance of initiating domestic production of this critical mineral. Their objections include short sighted observations that 1) the current reserves will only produce 2-3 years of domestic US antimony production, 2) currently, antimony processing facilities only exist outside the U.S., and 3) antimony is readily replaceable with other materials in manufacturing. These objections do not fully consider the adaptability of US manufacturing and supply chains to shifting commodity supply and potential for increased demand.

Current resources of antimony at the Stibnite site are in excess of 200 million lbs. and vastly exceed other domestic sources. Moreover, these resources are likely to expand significantly, especially with development of the Scout exploration decline or with underground development of resources at the Hangar Flats prospect occurring outside the reserve defining MMP open pit. District wide antimony resources could conceivably equate to a decade's worth of US consumption once fully developed. Furthermore, other mineral exploration activities in the region could conceivably define additional antimony mineral resources, such as Stallion Gold's land holdings at Antimony Ridge. These could conceivably be economically produced using Perpetua's process plant should reserves be established.

Furthermore, permitting of the Stibnite gold project would likely incentivize construction or expansion of US based antimony processing facilities. Perpetua has already been in consultation with US antimony, which refines antimony in North America, and definition of a sufficiently large antimony reserve in the district would likely spur development and construction of North American processing facilities. Domestic production and refining of antimony needs to start somewhere and there is no better place than Stibnite, Idaho.

While antimony may be replaceable in consumer goods, suitable replacements of antimony in munitions are still outstanding, as evidenced by the DOD's interest in Perpetua's antimony reserves and recent grant funding.

There's a good reason that antimony is near the top of the list of U.S. critical and strategic minerals; its important and not produced here. The forest must approve the Stibnite project by issuing a final EIS and positive ROD without haste to ensure unfettered supply of this critical and strategic commodity, while delivering positive economic and restorative benefits to the Stibnite area and local communities.

Sincerely,



Mark Kirby
Corporate Operations Manager
Itafos Conda, Soda Springs