



January 5, 2023

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

Dear Ms. Jackson:

On behalf of the Idaho Associated General Contractors (AGC) and our 600 member companies statewide, thank you for the opportunity to comment on the open docket regarding Pereptua's proposal to redevelop and restore the Stibnite Mining District. It is our belief as an organization that this project as outlined in the Modified Mine Plan Alternative of the Supplemental Draft EIS would provide immense benefits to Idaho's workers and the state's overall economy. I ask that you please finalize the EIS under the Modified Mine Plan Alternative without further delay.

The Idaho AGC has members in each of Idaho's 44 counties. Together, they help build the places where everyday Idahoans work, shop, worship, receive medical care, attend school, and much more — as well as the infrastructure that connects it all. The construction and contracting industry play a vital role in the health of Idaho's economy, however, recent actions by the Federal Reserve to raise interest rates and their trickled down effects on residential construction have affected us as projects statewide are delayed or canceled. I believe the Stibnite Gold Project offers a valuable opportunity to reignite economic opportunities for general contractors, construction workers, and engineers across the state—as well as for a whole host of other professions outside our industry.

Throughout the lifetime of this proposed project, Perpetua has committed to hiring, contracting with, and purchasing supplies and services from Idaho-based vendors whenever possible. In fact, the company has already spent nearly \$100 million right here in Idaho by working with local vendors and contractors. Seeing this project through to its completion will create a supply chain of Idaho-based companies, strengthening the economic outlook for dozens or hundreds of local businesses and providing new opportunities for growth while supporting a stronger, more stable workforce.

Based on projections in the Supplemental EIS section 4.21, the construction phase of the Stibnite Gold Project alone would directly employ up to 640 people, with an annual payroll that could reach up to \$66 million. Construction would of course provide numerous

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benefits for local general contractors, laborers, engineers, and other construction professionals. During full operations of the mine, Perpetua expects to provide up to another 580 jobs for the local communities surrounding the site, with potential annual payroll reaching up to \$53 million. The jobs created during operations would range from management and administration to equipment operators and general laborers to mechanics, electricians, engineers, and more.

And these are just the jobs that Perpetua as a company would directly create. Indirectly, the construction phase would support another approximately 800 jobs while operations would support 370 jobs in Central Idaho plus additional induced jobs.

The overall local income impact to Valley and Adams Counties is quite significant. The Supplemental EIS estimates approximately \$30 million in annual income will be injected into local communities. This will help support and diversify the local recreation and service industry-based economy in the area with stable, non-seasonal, high paying jobs offering strong benefits.

On top of the jobs this project would support, there is also the economic value added by the tax contributions the Stibnite Gold Project would make to the local and state economy. According to the economic impact analysis discussed in section 4.21, the project would cost a total of approximately \$1.1 billion to build and roughly \$230 million each year to operate, contributing significant local and state tax revenue and injecting hundreds of millions of dollars into the larger economy.

After closely reviewing the Supplemental Draft Environmental Impact Statement released by the U.S. Forest Service, it appears that even your own agency recognizes this project's economic potential. The benefits are detailed in section 4.21, but it is difficult to determine total job impacts or income benefits of the project without closely reading beyond the executive summary. The final document would be improved if these economic benefits to Idaho from the Stibnite Gold Project were more clearly presented in the summary.

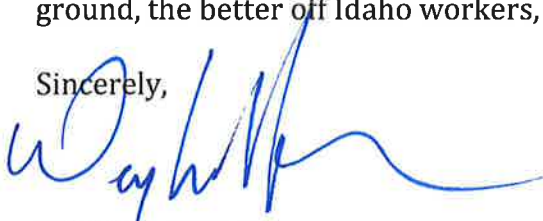
Out of all the options that have been analyzed for the project in the DEIS and supplemental EIS, the Modified Mine Plan is far and away the most effective solution that will yield the largest environmental and economic benefit for Idahoans, and we support the decision of the USFS to select this as the preferred alternative. Moreover, additional delay to move this project forward would equate to continued inaction at the site, essentially preventing Idaho from ever seeing any restorative or economic benefits whatsoever.

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For the sake of local jobs in the construction industry and across a range of economic sectors—as well as a stronger Idaho economy in general—We ask that you please finalize the EIS for the Stibnite Gold Project as soon as possible. The sooner this project gets off the ground, the better off Idaho workers, communities, and economies will be.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wayne L. Hammon", with a long horizontal flourish extending to the right.

Wayne L. Hammon
CEO, Idaho AGC