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Comments: Dear Ms. Jackson,

I am writing this letter in support of the Perpetua Stibnite Gold Project in Idaho and to urge the U.S. Forest Service to move forward by permitting the project as outlined under the Modified Mine Plan Alternative in the Supplemental DEIS and Modified Plan of Restoration and Operations 2.

I am a professional mining engineer (Nevada, Arizona) with 40 years of practical mining experience. I have spent most of my career operating or building world class mines that provide safe and good paying jobs for employees, and that support the surrounding communities. I have been awarded the Lawrence Saunders Gold Medal from the American Institute of Mining, Metallurgy and Petroleum Engineers, have been inducted into the Academy of Engineers at the University of Idaho, and was the President of the Society for Mining, Metallurgy and Exploration in 2016.

In 2004 I was the Vice President and General Manager of the Kensington Gold Mine for Coeur d'Alene Mines (now Coeur Mining) where we successfully permitted a mine in a pristine National Forest through a cooperative (and exhaustive) effort with the USFS. Many things about the Stibnite Project remind me of Kensington. Some similarities include:

- *Good, safe family-supporting jobs, focused on local hire, creating sustainable opportunities for local small businesses

- *Significant investment by our industry that will generate hundreds of millions of dollars of direct and indirect taxes

- *Years of detailed and comprehensive reviews of the plans by local, state and federal agencies including a DEIS and culminating in an SDEIS.

One key area where the Stibnite Project differs from Kensington is the exceptional benefits of providing much needed critical minerals to reduce our country's dependency on unfriendly countries, and the exceptional plan of restoring a vast habitat to a significantly better condition than it is today.

Unlike the Kensington project, which did not require a supplemental DEIS, the modified mine plan (MMP) developed for the Stibnite Project further protects and even improves the environment while providing the benefits stated above. Both Perpetua, and the USFS deserve credit for making the Stibnite Project even better. The project modifications are backed by Perpetua's 2020 bankable Feasibility Study, which coupled with the environmental modeling in the SDEIS, demonstrates that the improvements are not only effective in reducing environmental impacts but also cost effective and economically viable. The key modifications of the MMP include the water management plan (including treatment plant), project components to eliminate temperature impacts across much of the site, and plans to place geosynthetic covers on backfilled pits. Key results predicted in the draft SEIS are improvements to water quality, reduced temperature effects and overall net-benefits for salmon and steelhead.

Since 2004 I have been involved with numerous NEPA (or Equator Principle) processes as a mine builder. In my previous comments on the DEIS, I wrote that the draft was one of the most complete and sound documents I have encountered in these 15 years of permitting mines. With this in mind, I am even more impressed with the quality of the supplemental DEIS and underlying analysis. The updated modeling further improves upon robust prior predictive models with improved calibration and extensive sensitivity studies. I specifically would like to complement the USFS for selecting the MMP as the preferred alternative; here the agency has thoughtfully and quite skillfully recognized the merits of an access and infrastructure plan using the burnt log route that protects the land you are the stewards of, and minimizes overall impact. By utilizing previously disturbed areas to a maximum, the project keeps a significant portion of the footprint on these lands. Quite a feat for a project of its size, in a pristine part of Idaho.

As a person that has been responsible for access to sites on public land in the past, I am particularly impressed with the Burntlog route as the best transportation option. The USFS has correctly identified this alternative as preferable to access along the Johnson Creek Corridor. This route allows traffic to access the mine while

avoiding existing routes that parallel major fish bearing waterways, which will reduce risk of potential spills, minimize sediment delivery to waterways, avoid known winter avalanche sites, and reduce potential conflicts with other drivers and users on South Fork and Johnson Creek Roads. The way in which Perpetua has worked with McCall to find an alternative that fits within their Comprehensive Plan and fits with the Idaho Department of Transportation long term objectives speaks volumes to the thoroughness of this route.

By bussing employees to the site, consolidating shipments, restricting traffic to business hours, muffling engine breaks you can see that Perpetua has put a lot of thought and commitment into serving the community and reducing dust generation, sediment runoff and the production of greenhouse gas emissions from extra vehicles on the road.

Perpetua listened to stakeholders during development of the project and heard that maintaining access through the site to Thunder Mountain Road was important for recreationists. As a result the mine plan now includes a comprehensive plan for maintaining access through the site by routing traffic on a road through or near the Yellow Pine pit as allowed by seasonal and operational safety conditions, which builds upon proposals in the DEIS with advanced engineering. They also agreed to work with local snowmobiling groups to plow Warm Lake Road between Landmark and the Burntlog Route into Stibnite throughout the winter, and ensure a route exists between Warm Lake and Landmark. Across the board, the way in which the company has listened to stakeholder concerns and implemented solutions into their proposed plan has been exemplary.

There has been much criticism of the project's restriction of public access to the project area in the press, notably the recent December 4th Idaho Press article and statements therein from Save the South Fork. The location of the operational boundary on the ridge-crest around the mine-site makes good sense as it would limit public access to the valley in which active mining operations are occurring thereby heightening public safety.

Perpetua's comprehensive water management plan is another key modification since the DEIS. The treatment technologies proposed have a successful track record for removal of key constituents. The water balance and associated management plan employs numerous redundancies and management principles which will provide operational flexibility and ensure no releases to the environment, especially use of the TSF and pits for excess water storage in the unlikely event that storm events exceeding design capacities occur. These management plans demonstrate the company's commitment to environmental stewardship through sound engineering and common sense design.

In summary, there are many good reasons to approve this project, including jobs, critical mineral supply, benefits to the community, amongst others. But I would like to leave you with my statement that in 40 years of working at, operating, and building mines, I believe the 2021 MMP of the Supplemental Draft Environmental Impact Statement on Perpetua's Stibnite Gold Project to be a most thorough, well thought out plan focusing on the community and the environment, backed by comprehensive environmental analysis in both a DEIS and supplemental DEIS. The project is unlike virtually any other plan I have seen and I strongly support a positive outcome from EIS process, culminating in a positive Record of Decision in the very near future.

Timothy D. Arnold, P.E.

Chief Operating Officer

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Past President (2016) the Society for Mining, Metallurgy and Exploration