

Data Submitted (UTC 11): 1/4/2023 5:26:21 PM

First name: Phil

Last name: Bandy

Organization: Excellon Idaho Gold

Title: Senior Project Manager

Comments: January 4, 2022

Linda Jackson,

I am writing to offer comments on the Supplemental Draft Environmental Impact Statement and express my support for the Stibnite Gold Project. As a native Idahoan, and mining industry professional, I have closely followed the development of the Stibnite Project from its inception. I appreciate the opportunity to participate in the second round of public commentary on the project and commend the USFS for working with Perpetua to further improve upon an excellent resource development project which offers a unique combination of mine-site remediation, fisheries and wetland restoration, critical mineral domestic procurement and economic development for rural Idaho.

My professional experience and education make me well qualified to comment on technical aspects of the 2021 Modified Mine Plan alternative assessed in the Supplemental Draft EIS (SDEIS) and the adequacy of the document itself. I have over 30 years of experience in environmental and natural resources administration, environmental consulting, mineral exploration, and environmental policy administration. I hold an undergraduate and graduate degree in geology and a graduate degree in Public Administration with an emphasis on Natural Resources administration. I served the State of Idaho for over 17 years in programmatic, policy development, and administrative positions. For the past 10 years, I have worked on mineral development projects throughout the state of Idaho.

First and foremost, the USFS has done a commendable job leading the development of the SDEIS and supporting environmental analysis. Through the 6+ years that the project has been in permitting, the USFS has identified key impact areas, sought input from the public and stakeholder entities, and developed alternatives effectively reducing and mitigating the impacts of the proposed action. The 2020 draft EIS was a comprehensive analysis and disclosure document, but it has been further improved upon with the publication of the October 2022 supplemental DEIS. The SDEIS and associated alternatives analysis is more than sufficient to meet the regulatory requirements under NEPA and should be finalized in short order.

Perpetua's reclamation and restoration plans are industry-leading and have been designed from the ground up to address many of the historical environmental issues resulting from pre-regulation mining activities. Comprehensive cleanup of the Stibnite Mining district would take hundreds of millions of dollars at tax-payer expense, money which is yet to be allocated and is unlikely forthcoming. The CERCLA cleanup actions conducted in the 2000s addressed issues with the potential for acute human health effects but were never designed to achieve the holistic environmental remediation efforts offered by the Stibnite Gold Project.

The comprehensive environmental analysis completed for the Stibnite Gold Project and summarized in the SDEIS demonstrates that site remediation and restoration efforts inherent in the project result in an overall net environmental and societal benefit and can be completed with private funding from Perpetua's shareholders with key findings including:

*Overall net benefits to salmon and steelhead through the removal of fish barriers with some positive benefits to trout species despite localized trout habitat impacts;

*Significant (40-60%) reductions in arsenic and antimony concentrations in the East Fork SFSR through the removal of existing mining wastes and best-practices management of newly mined materials; and,

*Creation of high-paying jobs and approximately \$30M in annual income impact on local communities throughout the project.

What is not apparent in the SDEIS document are the benefits of Perpetua's wetland and riparian restoration plans. It is not clear that the restorative benefits of the project, such as backfilling the Yellow Pine pit and constructing a meandering channel system, or other improvements and enhancements to stream segments on-site, such as increasing floodplain connectivity and creation of stream hydraulic features important for fish habitat are accounted for in the wetland impacts section of the document. Perpetua's public presentation materials discuss stream restoration efforts at length including concurrent restoration activities, but these are only briefly discussed in the document in section 4.11.3 that states mitigation would entail "creation of new wetlands and enhancing and reclaiming existing wetlands in the general vicinity of the impact areas" in addition to off-site mitigation. Section 2.4.7.1 indicates that "37 percent of the reclamation would be completed concurrent to mining and ore processing" with the remainder completed during the closure, and those reclamation activities would include "creation of new wetlands," and "revegetation on disturbance areas." If these benefits are not accounted for, the impact assessment in the document is highly conservative. Perpetua's restoration plan is industry-leading. I believe that the restoration work planned for the site, in conjunction with the required compensatory mitigation, will result in a net improvement in both on-site and off-site mitigation areas.

In addition to wetland impacts, the SDEIS analysis appears to discount many of the habitat improvements offered by the Stibnite project due to long time-frames estimated for revegetation of the site including fish habitat and stream temperature impacts, and vegetation impacts. The mining industry has demonstrated that it can successfully reclaim and revegetate previously disturbed areas, as evidenced on the Stibnite site by Hecla Mining company's reclamation of the Homestake area of the Yellow Pine pit and by Perpetua's road and drill pad reclamation. The reclamation and closure plan has measures to ensure that sufficient growth media is available for closure, such as wood chip and compost soil amendments and the use of till as bulking materials. Revegetation adaptive monitoring plans and project financial assurances will ensure that these efforts are ultimately successful. Revegetation is not a challenge unique to the Stibnite project but would be common to any proposed reclamation and restoration activities conducted on the site. Adequately addressing the site's extensive environmental degradation and mining impacts would invariably require new surface disturbances and revegetation efforts, whether associated with a mining project or a tax-payer-funded cleanup effort. To realize the net-environmental benefits of the Stibnite project or any reclamation effort on the site, one must accept some short-term vegetation and habitat impacts.

The critique of the SDEIS above should not delay the issuance of a final EIS document. The overall benefits of the Stibnite project as currently outlined in the SDEIS warrant the prompt conclusion of the permitting process so that Idahoans and the environment can benefit from all this project has to offer. I urge the USFS to issue a final EIS and approve the construction of the mine under a ROD as soon as possible.

Thank you for considering my comments,

Phil Bandy
Excellon Idaho Gold, Inc.
Senior Project Manager
pbandy@excellonresources.com