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Submitted Electronically To:

<https://www.fs.usda.gov/project/?project=50516>

January 10, 2023

Linda Jackson, Payette Forest Supervisor
Stibnite Gold Project
500 North Mission Street, Building 2
McCall, ID 83638

**RE: Stibnite Gold Project Supplemental Draft Environmental Impact Statement
Forest Service, Region 4, Payette and Boise National Forests
Valley County, Idaho
EIS No. 20220154**

Dear Ms. Jackson:

I am submitting these comments on the Supplemental Draft Environmental Impact Statement (SDEIS) published by the Payette and Boise National Forests (Forest Service) for Perpetua Resources Idaho Inc.'s (Perpetua) proposed Stibnite Gold Project (SGP) in Valley County, Idaho. 87 Fed. Reg. 65,203 (October 28, 2022).

I. Introduction

A. Identity and Interest of the Commenter

I am the former President and CEO of Midas Gold Corp. (the predecessor to Perpetua Resources Corp. (hereinafter collectively referred to as "PRC")), the parent company of the Project proponent Perpetua Resources Idaho, Inc. In my capacity as CEO of PRC, I was responsible for guiding the launch of the Stibnite Gold Project with the filing of the initial Plan of Restoration and Operations ("PRO") with the Forest Service in 2016. Previous to that, I presided over, and was deeply involved in, the initial public offering of PRC on the Toronto Stock Exchange in 2011 and the subsequent technical, environmental and social evaluation of the SGP before, during and after the filing of the PRO.

As key component of these efforts, I was intimately involved with the development of the voluntary Administrative Settlement Agreement and Order on Consent (ASAOC, discussed further below) with the United States Environmental Protection Agency (EPA) and Forest Service that was consummated in January 2021 under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, Pub. L. No. 96-510, 94 Stat. 2767 (1980) (codified as amended at 42 U.S.C §§ 9601-9675 (CERCLA). During my time as CEO, I met often with representatives of Idaho's Federally recognized Tribes who have an interest in the SGP in order to provide regular updates on the Project to the Tribes, to discuss and address concerns and provide technical and other information requested by the Tribes.

As former CEO and a shareholder of Perpetua Resources, I am well aware of the vision of the SGP and what it will mean for future economic opportunity in this part of Idaho as well as the environmental opportunity the Project will bring to this abandoned legacy mining site in the Stibnite Mining District. I filed several comment letters to the Draft Environmental Impact Statement (EIS No. 20200165) in October 2020, each covering different matters related to the Project, and those letters are incorporated herein by reference.

When CEO, I also initiated an evaluation of the potential to resume production of the critical metal, antimony, at Stibnite, noting its storied history and material contribution to the Second World War and Korean War, engaging with the U.S. Department of Defense, U.S. Department of Energy and other Federal agencies to determine the criticality of a secure supply of antimony produced in the U.S.

Finally, because the Preferred Alternative (2021 MMP) (1) incorporates water management and closure activities to reduce the duration of long-term water treatment requirements; (2) incorporates measures to manage stream temperatures; and (3) 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 (see SDEIS Executive Summary at ES-6), I support the 2021 MMP becoming the future Selected Alternative in the upcoming Record of Decision.

B. Summary of Comments

First, the 2021 MMP is representative of a thoughtful, thorough, and responsive effort by Perpetua to ensure the best Proposed Action is before the action agency and the public. The Preferred Alternative should appropriately be advanced as the Selected Alternative in the Record of Decision.

Second, the voluntary Administrative Settlement Agreement and Order on Consent (ASAOC) represents Perpetua's good faith effort to begin cleanup of the abandoned Stibnite Mining District before the Stibnite Gold Project is permitted. Full site cleanup will occur once the Project proceeds into operations. The SGP and ASAOC are the only available paths to full restoration of a site that is still suffering from legacy effects.

The U.S. Government has determined that the critical mineral antimony is vital to United States National defense. See *DoD Issues \$24.8M Critical Minerals Award to Perpetua Resources* (Dec. 19, 2022) at <https://www.defense.gov/News/Releases/Release/Article/3249350/dod-issues-248m-critical-minerals-award-to-perpetua-resources/> ("Perpetua's Stibnite-Gold Project produced antimony trisulfide for the U.S. ammunition industrial base during World War II and the Korean War, and it is the sole domestic geologic reserve of antimony that can meet Department of Defense (DoD) requirements."). The Statement of Purpose and Need for both the DEIS and SDEIS has contemplated, from the beginning of this NEPA review, that the production of antimony is a key focus of SGP operations.

II. Comments

A. The Evolution of the Stibnite Gold Project Alternatives through the National Environmental Policy Act Review is a Case Study in Responsiveness by the Project Proponent to Public Review

1. The Stibnite Gold Project

The former Stibnite mine site is located in the Payette National Forest in Valley County, Idaho, approximately 10 miles east of Yellow Pine, Idaho, 40 miles east of McCall, Idaho and 98 miles north of Boise. Perpetua delivered the Plan of Restoration and Operations (PRO) to the United States Forest Service in September 2016 for review under the National Environmental Policy Act (NEPA), see 82 Fed. Reg. 25,759 (June 5, 2017) (notice of intent to prepare environmental impact statement).

In its original and subsequently modified filings, Perpetua is proposing to construct a mine and associated processing facilities in order to commercially extract gold, silver, and antimony in Idaho's Stibnite Mining District, which was a major producer of antimony, tungsten and gold from the 1920s to the 1950s and gold during the 1980s and 1990s.

It is important to note that the Stibnite Mine helped the United States win World War II. The Mine produced more tungsten and antimony during that period than any other mine in the United States, right through to the end of the Korean War. Tungsten and antimony were critical minerals for defense; tungsten was needed for strengthening steel and antimony for hardening lead, in the manufacture of munitions and as a flame retardant. Production of these critical minerals at Stibnite was so critical to the war effort that, on May 15, 1943, then-General Eisenhower sent the mine a telegram in 1943 thanking the workers for their significant contribution to success at a critical moment in the War. "*There is victory for all of us in the achievement*" General Eisenhower proudly proclaimed to the Idahoans at Stibnite.

During a congressional hearing post-war, the mining production at the Stibnite Site was estimated to have saved a million American lives and shortened the war by a year. See 102 Cong. Rec. S4118 (March 7, 1956) ("*The Government invested millions to build access roads and open up this mine. In the opinion of the Munitions Board, the discovery of that tungsten mine at Stibnite, Idaho, in 1942 shortened World War II by at least 1 year and saved the lives of a million American soldiers.*")

However storied its past, the Stibnite Site was left substantially impacted from an environmental perspective. Nevertheless, from the outset, the Stibnite Gold Project has been designed to clean up legacy environmental impacts left behind by those prior operators, before and during mining and, when in operation, would provide a more than \$1 billion investment in Idaho, including upgrades to public infrastructure such as roads and power lines in rural Idaho. The SGP will provide approximately 1,000 well-paying direct and indirect jobs to Idahoans and expand the economy with more than \$40 million in direct annual payroll during operations and hundreds of millions in Federal, state and local taxes over the life of the project.

2. The Progression of the Proposed Action

The journey from the original PRO as filed by Perpetua to the identification of the Preferred Alternative in the SDEIS is a case study in responsiveness by a project proponent under the National Environmental Policy Act (NEPA). As this is written, the NEPA process for the SGP will have involved more than six years of review by various federal, state and local agencies that includes almost five calendar months of formal EIS public review (at least 150 total comment days, unless the current period is extended) as well as a 60-day advance SDEIS review by Idaho's Federally-recognized tribes prior to the document's availability to the public. By any measure, tribal and public participation in the EIS review of the Stibnite Gold Project will have been "meaningful", a hallmark of a thorough and informed NEPA process.

From the original PRO forward, the SGP incorporated its core values and guiding conservation principles into the project design, see *Midas Gold, Stibnite Gold Project Plan of Restoration and Operations* at ES.4 (Sept. 2016). Environmentally, the Project goes above and beyond what is required, with practical solutions to manage Project construction, operations and closure while protecting and enhancing the natural environment by incorporating ‘fixes’ to legacy impacts in the project scope.

On August 14, 2020, the Forest Service released a DEIS analyzing in detail the environmental impacts of five alternatives related to the project, including Alternative 2, which was a Perpetua-designed updated and modified Plan of Restoration and Operations and which introduced additional avoidance and mitigation measures.

The DEIS, extensively and in detail, discussed the SGP’s environmental impacts, including differences among the above noted range of alternatives, so that the public could evaluate and comment on their comparative merits. Importantly, Alternative 2 represented the evolution of the Proposed Action from the original PRO due to Perpetua’s commitment to refine the environmental performance of the SGP in response to comments provided both through NEPA and collected directly by PRC during literally hundreds of engagements with a broad swath of stakeholders and interested parties. The DEIS discussed ground and surface water quantity and quality effects, and the water-related impacts on fish from project impacts to stream flow and water temperature. It is estimated that the Forest Service received nearly 10,000 public comments during the 75-day DEIS comment period, including many substantive comments supporting the innovative and proactive addressing of legacy environmental issues at the site.

A Supplemental Draft Environmental Impact Statement was determined to be in order by the Forest Service in the summer of 2021 due to the continued refinements to the Proposed Action through independent review and proactive response to DEIS comments by Perpetua, which refinements were designed to further improve the proposed project’s environmental outcomes. As a result of this thorough NEPA analysis, the Forest Service has appropriately identified a Preferred Alternative with important improvements to Alternative 2.

3. The Preferred Alternative in the SDEIS should Become the Selected Alternative

Given the current environmental condition of the Stibnite Mining District, the “No Action” Alternative is simply not an option for the Forest Service Record of Decision. The 2021 MMP is the only means available to the Federal government to discharge its obligations under the Mining Law of 1872, which, by act of Congress, ‘*all valuable mineral deposits in lands belonging to the United States ... are hereby declared “free and open to exploration and purchase.”*’ Mining Law of 1872 § 1, 17 Stat. 91 (codified at 30 U.S.C. § 22). The SGP is also the only opportunity for responsible resource development while extinguish Federal agency exposure for current Site conditions notwithstanding multiple efforts to contain its exposure as a “potentially responsible party” through the Consent Decrees discussed further below.¹

1. Under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), potentially responsible parties (“PRPs”) may be liable for response costs for cleanup actions to protect the public health, welfare, or the environment. CERCLA targets four broad categories of PRPs which may be held jointly and severally liable for the cost of cleanup, and they include current owners and operators of a facility; former owners of a facility; arrangers for the disposal and treatment of hazardous substances; and transporters of the hazardous substances. The United States is arguably a past and current owner of the Stibnite Mine Site.

The Preferred Alternative represents an improved Proposed Action in several critical aspects. As a result of independent review of the MMP by Perpetua, in addition to public comment from the DEIS, multiple adjustments now appear in the SDEIS Preferred Alternative, including (but not limited to):

- Water Treatment: An active water treatment facility has been added to the MMP. This treatment plant will operate throughout the mine life and during mine closure until the tailings are consolidated, which is estimated to occur in Mine Year 40.
- Water Temperature Increases and Lake Habitat Reduction: Stibnite Lake was added to the MMP to minimize stream temperature fluctuation and to replace lake habitat for bull trout.
- Tailings Impoundment Facility: The impoundment will be fully lined. Prior to constructing the liner, an underdrain groundwater conveyance and collection system would be constructed. A composite liner system with a network of geosynthetic over liner drains would then be installed above the underdrain system.
- Reduction of Surface Disturbance: The Fiddle Creek Development Rock Storage Facility was eliminated from the MMP, which reduces the SGP's surface disturbance by 168 acres.

These adjustments, based in sound science, have clearly further improved the environmental performance of the SGP. But these beneficial Project modifications have come at an enormous cost for Perpetua and its shareholders due to the time and effort expended on the SGP review and analysis. However, the thorough NEPA review should result in efficiency and benefit the final decision on the Selected Alternative by the Forest Service because, as the SDEIS recognizes, the Preferred Alternative as set forth in the SDEIS *“reasonably accomplishes the purpose and need for the federal action, while giving consideration to environmental, economic, and technical factors.”* SDEIS Executive Summary at ES-6.

B. Perpetua's Commitment to Pre-Permitting Site Cleanup under CERCLA is a Testament to its Commitment to Responsible Mining and Site Restoration

1. Abandoned Mine Sites Such As the Stibnite Mining District Plague the United States

The Government Accountability Office (“GAO”) recently estimated that there are at least 140,000 abandoned hard rock mine “features” (such as a tunnel, pit, or other working) on lands under management of or control by the United States Department of Agriculture Forest Service (“USFS”) and the Department of the Interior’s Bureau of Land Management (BLM) and Park Service. See UNITED STATES GOVERNMENT ACCOUNTABILITY OFFICE, ABANDONED HARDROCK MINES, INFORMATION ON NUMBER OF MINES, EXPENDITURES, AND FACTORS THAT LIMIT TO ADDRESS HAZARDS (GAO-20-238) *Highlights* (March 2020). The GAO also found that of this initial universe of “features”, about 67,000 pose or may pose physical safety hazards such as danger of injury or death. And, according to GAO, about 22,500 of said “features” pose or may pose environmental hazards such as risks to human health or wildlife from long-term exposure to harmful substances.

National Forests total over 188 million acres of land, mostly in the Western United States. Using data compiled by the United States Bureau of Mines, the Forest Service estimated in 1995 that the number of abandoned mines on National Forest Lands totaled approximately **38,991** total abandoned mine sites. Of those sites, 13,597, or 34% of the total number, were mines such as Stibnite with records of mineral production.

Many of these abandoned mines on Forest Service lands involved minerals like arsenic, cadmium, copper, lead, mercury and zinc which can cause human health and environmental impacts. See <https://www.fs.usda.gov/managing-land/natural-resources/geology/abandoned-mine-lands>. In 2014, the Forest Service estimated that *for their lands alone*, it could cost approximately \$6 billion to address environmental hazards at just 6,600 of the abandoned hardrock mine sites. See GAO-20-238 at 33.

2. The Federal Government Fled the Stibnite Mining District, Never Implemented Controls it was Obligated to Put in Place and has Never Returned Even Though the Site Continues to Degrade the Environment

The SDEIS discussion of the CERCLA history beginning at Section 1.3, page 1-5, is incomplete.

The story of the abandoned Stibnite Site is not the classic case study of operator boom-bust-flee and, although it includes multiple scenarios, it also includes abandonment of the Site – with complete legal protection – *by the United States government itself*. The Stibnite Mining District Site has been the object of several significant CERCLA consent decrees (“CDs”) filed in separate jurisdictions. Each case involved issues related to recovery of response costs and offensive litigation against the Federal Government by the non-Federal potentially responsible person, or “PRP” under Section 107 of CERCLA, 42 U.S.C. § 9607.

a. Mobil Oil Corporation (2000)

In *Mobil Oil Corporation v. United States of America*, Civil Action No. 99-1467-A (E.D. Virginia) (filed June 26, 2000); Mobil began certain cleanup actions pursuant to an AOC in addition to a Voluntary Consent Order with the State of Idaho. In an offensive declaratory relief action, Mobil asserted that the United States was liable for contribution to the past response costs. At one point in the contested litigation, the District Court signaled that the Government would be held to have been a PRP due to the Federal interests in developing the Stibnite/Yellow Pine Site for the war effort. Mot. Hrg. Tr., *Mobil Oil Corp. v. United States*, No. 99-1467-A (E.D. Va. Apr. 28, 2000) (Hilton, J.).

The U.S. Government ultimately released Mobil Oil Co. (successor to Superior Mining, a former mining operator on site) from future CERCLA response costs and provided the company \$1.55 million as partial reimbursement for their response costs. Settlement Agreement, *Mobil Oil* (filed June 26, 2000). The United States and Mobil Oil exchanged covenants not to sue, though the United States reserved rights as to natural resource damages and a cause of action to enforce Mobil’s “*liability, not to exceed \$1.1 million, for the costs for future response actions, including constructing an impermeable cap*” at the Spent Ore Disposal Area (“SODA”), which was never constructed (more below). Additionally, Mobil Oil and the “Settling Federal Agencies”—the USDA, Interior, and U.S. Department of Commerce—received contribution protection under CERCLA for past and future response costs thereby attempting absolve themselves from future liability.

b. United States of America v. Bradley Mining Company (2012)

United States of America v. Bradley Mining Company, Case No. 3:08-CV-03968 TEH and *United States of America v. Bradley Mining Company*, Case No. 3:08-CV-05501 TEH (N.D. Cal.) (Consent Decree filed April 19, 2012), covered several additional sites in addition to the Stibnite Project. In the *Bradley* CD, the United States and other PRPs again exchanged covenants not to

sue, with the exception of natural resource damages (among other exceptions). Once again contribution protection was extended to “Settling Federal Agencies” which included the following:

- United States Department of Agriculture;
- United States Department of Defense;
- United States Department of the Interior;
- United States Environmental Protection Agency;
- United States General Services Administration; and
- “[A]ny other department, agency, and instrumentality of the United States against whom claims for cost recovery, natural resources damages, or contribution under CERCLA could be asserted with regard to the ... the Stibnite Mine Site.”

Regarding the \$1.1 “impermeable cap” that was the subject of the *Mobil Oil* CD, Idaho Representatives Mike Simpson and Russ Fulcher inquired of EPA in February, 2022 why the cap was never constructed. *Letter from Representative Mike Simpson and Representative Russ Fulcher to Michelle Pirzadeh, Acting EPA Regional Administrator (February 2, 2022)*. In response, EPA conceded that, although the Federal government has continued to reserve its right to require Mobil Oil to construct the cap, it hinged on the effectiveness of a sand filter topped by bedding and rip rap along the length of SODA in contact with the Meadow Creek channel that was the subject of a 1998 Administrative Order on Consent between Mobil Oil, the Forest Service and EPA. *Letter from Michelle Pirzadeh, Acting EPA Regional Administrator to Representative Mike Simpson and Representative Russ Fulcher (February 17, 2022)*.

According to EPA in response to Idaho’s Members of Congress, “*To date, the EPA and USFS have not evaluated the effectiveness of the sand filter; therefore, we have not pursued Mobil Oil or any other potentially responsible parties to build the impermeable cap or to recover the \$1.1 million for the cost of constructing such a cap.*” *Id.* Accordingly, the United States had not only fled the Stibnite Site, it has left it completely neglected, not having even evaluated the effectiveness of the control measures in over 20 years since their installation.

But the Site remains active and efficient in continuing to generate degrading conditions. See SDEIS Section 3.1 (“*Currently, there are ongoing releases of hazardous substances, pollutants, and contaminants to surface water and groundwater at the site including elevated concentrations of antimony, arsenic, copper, lead, mercury, and cyanide. Most notable are elevated concentrations of arsenic and antimony.*”)

In the SODA area alone, the U.S. Geological Survey estimated in a 2015 study that this part of the Stibnite Site contributes over 700 pounds of antimony and 1100 pounds of arsenic into Meadow Creek every year. See *Etheridge, A., 2015; Occurrence and Transport of Selected Constituents in Streams near the Stibnite Mining Area, Central Idaho, 2012-14; Scientific Investigations Report, 2015-5166, U.S. Geological Survey*. That adds up to approximately 22,000 pounds of arsenic into the river since the year 2000, the date of the *Mobil Oil* CD.

The EPA has recognized that attracting private capital to reuse and redevelop National Priority List (“NPL”) facilities is worthy public policy, particularly as applied to formally designated Superfund sites. See ENVIRONMENTAL PROTECTION AGENCY, SUPERFUND TASK FORCE FINAL REPORT 57 (Sept. 2019) (“*EPA will sustain its commitment to promoting redevelopment and reuse of federal property on the [National Priorities List] ... where there are opportunities for productive reuse.*”). It is clear that attracting private investment to abandoned, contaminated sites can ease the burden on the public purse. While Stibnite has not been so designated, it has previously been considered for listing and surely meets the definition of ‘worthy public policy’.

Advancement of the Stibnite Gold Project, particularly with its history of abandonment and neglect described above, remains the sole option for cleanup of this legendary legacy site.

3. The Administrative Settlement Agreement and Order on Consent is a Down Payment for Cleanup of the Stibnite Mining District

On January 15, 2021, Perpetua executed a voluntary Administrative Settlement Agreement and Order on Consent (ASAOC) executed on January 15, 2021 between the EPA, the U.S. Forest Service Region 4 (with concurrence by the U.S. Department of Justice) and Perpetua Resources under CERCLA. This voluntary agreement is a template to attract private capital to address cleanup of abandoned mine sites, particularly when the site is truly orphaned, meaning when no parties (including, as here, the Federal Government given the agency's having granted themselves releases under the Mobil and Bradley CDs) are left to assume responsibility for cleanup.

The Stibnite ASAOC calls for a commitment by Perpetua of \$7.5 million over four years (Phase I) to undertake CERCLA "time critical" removal actions (TCRAs) to address water quality concerns that have plagued the Site for decades. The additional phases of cleanup under the ASAOC hinge on the Company securing its permitting and infrastructure to operate the Project as they are of a scale and nature that they can only be addressed through redevelopment of the site and access to the facilities constructed therewith. The key Phase I TCRAs set forth in the ASAOC's Statement of Work ("SOW") are directed at:

1. Improving water quality through diversion actions in key areas of the Stibnite Site including diversion of Hennessy Creek around the Northwest Bradley Dumps; diversion work in DMEA Waste Rock Dump Area; and diversion of surface water to avoid the Smelter Flats/Hangar Flats source area.
2. Attacking legacy areas of the Stibnite Site where mine waste continues to plague current water quality; including Lower Meadow Creek Valley Tailings Removal Action (25,000 tons); Bradley Man Camp Dumps Removal and On-Site Repository (200,000 tons); and Northwest Bradley Dump Stream Waste Material Removal and Slope Stabilization (100,000 tons); and
3. Reviewing of additional areas of the Site for potential future CERCLA response actions, including studies at five adit areas (Bailey Tunnel, DMEA Adit, Bonanza Adit, Cinnabar Tunnel, and Meadow Creek Adit) and a Site Characterization Report presenting data relevant to the areas of the Site (Meadow Creek Mine Adit area; Meadow Creek; Hecla Heap Leach & Pioneer tailings; Canadian Superior Heap Leach Pads (On-Off) area; Defense Minerals Exploration Administration (DMEA) Waste Rock Dump area; DMEA Adit area; Bradley Man Camp Waste Rock Dump area; Areas adjacent to and NE of the Yellow Pine Pit, including Monday Camp, Monday Camp Waste Rock Dump, and SE Bradley Waste Rock Dump; Areas adjacent to and SW of the Yellow Pine Pit, and the BMC NW Bradley Waste Rock Dump; Cinnabar Tunnel Adit area; Northwest Bradley Waste Rock Dumps/Hennessy Creek area; Northeast Bradley Northeast Oxide Dumps area; Bailey Tunnel outlet area; Bonanza Adit area (Sugar Creek); and Bonanza Dump).

Importantly, these early TCRAs in Phase I of the ASAOC are accounted for in the SDEIS as reasonably foreseeable future actions in each of the alternatives analyzed, including the No Action alternative, see SDEIS Section 4.9.2.1, p. 185 (*"the effects of the ASAOC are reasonably foreseeable future improvements in analyte concentrations in Meadow Creek and the EFSRSR*

associated with stream flow interaction with the historical mine waste. To the extent that surface waters recharge groundwater in these areas, there would also be a potential improvement in groundwater analyte concentrations”).)

C. The Recent Announcement by the Department of Defense regarding of the Stibnite Gold Project Underscores Antimony’s Importance for National Security and is Consistent with the Original Purpose and Need for the SGP’s NEPA Review

On December 19, 2022, the United States Department of Defense announced that it awarded Perpetua a Technology Investment Agreement under Title III of the Defense Production Act (DPA) to Perpetua. *DoD Issues \$24.8M Critical Minerals Award to Perpetua Resources* (Dec. 19, 2022) at <https://www.defense.gov/News/Releases/Release/Article/3249350/dod-issues-248m-critical-minerals-award-to-perpetua-resources/> (“The DPA Investments Program will provide \$24.8 million to Perpetua to complete environmental and engineering studies necessary to obtain a Final Environmental Impact Statement, a Final Record of Decision, and other ancillary permits.”)

Just as the Stibnite Mining District supported several war efforts (see above discussion of its contribution to World War II), the Stibnite Site will potentially return to where it began: support of the Nation’s sovereign defense. According to the United States International Trade Commission, antimony is used in a variety of military applications, including night vision goggles, explosive formulations, flares, nuclear weapons production, and infrared sensors. As of 2020, the leading United States domestic uses of antimony were in flame retardants, lead-acid batteries, as a key alloying material for strength (e.g., shielding materials), and antifriction alloys. See *Antimony: A Critical Material You’ve Probably Never Heard Of* at https://www.usitc.gov/publications/332/executive_briefings/ebot_a_critical_material_probably_never_heard_of.pdf (paper published October 2021).

Development of a domestic source of antimony as a purpose of the Stibnite Gold Project is not a recent or material evolution of the Proposed Action. The SDEIS declares that the need for this NEPA review is to:

*“Consider approval of Perpetua’s 2021 MMP for development of the SGP to mine gold, silver, and **antimony** deposits that, where feasible, would minimize adverse environmental impacts on NFS surface resources; and ensure that measures are included that provide for mitigation of environmental impacts and reclamation of the NFS surface disturbance.”*

SDEIS at ES-1 (emphasis added).

See also Stibnite Gold Project Draft Environmental Impact Statement at 1-6 “*the need for federal action is to ... [r]espond to Midas Gold’s plan of operations for development of the SGP to mine gold, silver, and **antimony** deposits in central Idaho.*” (emphasis added).

The SDEIS clearly sets forth the role antimony production will play as a function of Project operations:

“The contained metal content in the 2021 proven and probable mineral reserve of the property is approximately 4.819 million ounces of gold, 6.431 million ounces of silver, and 148.686 million pounds of antimony. From the total ore currently planned to be mined the

*SGP is estimated to recover, over 15 years of mill production, 4.238 million ounces of gold, 1.710 million ounces of silver, and **115.342 million pounds of antimony.***

SDEIS at ES-8 (emphasis added)

Accordingly, while the DPA funding endorses the import of the Stibnite Gold Project in the context of National defense, NEPA review of the SGP's antimony production has been an integral part of the alternatives analysis from the start. *"This award does not interrupt the ongoing National Environmental Policy Act (NEPA) review process, nor does a DPA Investment confer any right or benefit through the permitting process."* See *DoD Issues \$24.8M Critical Minerals Award, supra.*

III. Conclusion

The 2021 MMP, the Preferred Alternative as identified in the SDEIS, has appropriately evolved through a thorough public process. It should advance to become the Selected Alternative in the Record of Decision for the Stibnite Gold Project.

Sincerely,



Stephen P. Quin