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TO: United States Forest Service

I'm writing to voice my personal concerns about the Perpetua Resources heap-leaching mine at the Stibnite Gold site near Yellow Pine, Idaho. My primary concern is that the northwest is littered with abandoned mine sites, many of which have claimed bankruptcy and defaulted on obligations to adequately protect the environment, primarily the surface and ground water. This leaves taxpayers responsible for the environmental cleanup costs, and/or leaves the site and associated water systems contaminated for generations.

A specific shortcoming in the EIS/SDEIS is the common reference to 'Best Practices'. I believe this needs a lot of scrutiny and clarification. Please acknowledge that Best Practices have failed in Montana. I'm sure you are aware that in 1998, Montana voters approved I-137, making Montana the first state to ban cyanide heap-leaching. Like most ballot initiatives, people didn't come up with I-137 by daydreaming of hopeful possibilities. Instead, it came from a specific project that was a high risk for contaminating an entire watershed. I view the Stibnite Mine site to have the same potential for contamination of the South Fork of the Salmon River.

A 'Best Practice' mine for comparison might be the Zortman-Landusky mines in Montana's Little Rocky Mountains, owned by Pegasus Gold. This specific mining operation had over a dozen cyanide spills including one incident that resulted in over 50,000 gallons of cyanide being spilled. The mine was also found to be leaking acids, arsenic and lead. This large and frequent contamination led to extensive surface and groundwater contamination. In 1993, the EPA filed a Clean Water Act suit that required a 32 million dollar clean up. The company filed for bankruptcy and left the state of Montana without proper reclamation of the land including leaving toxins like arsenic, hills of waste rock and exposed mountain sides. Perpetua Resources needs to study mine site failures and then satisfy the USFS that appropriate measures are being taken to ensure an environmentally safe and secure project site. In addition, Perpetua Resources must establish an adequate fund to address contaminants from the site well into the future.

The South Fork of the Salmon River is a historical migratory destination for Chinook Salmon, Steelhead Trout, and Bull Trout. These fish are listed under the Endangered Species Act, and I'm disappointed that recovery efforts have been stifled over decades because there is not a business or political willingness to save the species. The Stibnite mine becomes another obstacle for the recovery of these species, especially when potential impacts to the water quality are considered (temperature, fish duct, potential water contamination). If the USFS does not stand on the side of salmon and trout recovery, and clean water, who will?

I believe the United States needs to have mines, but I don't believe every location is conducive to mining. It seems that mining gold is the primary objective for the Stibnite site, but that mining antimony is being used to justify the project as a 'national defense' project. If the United States views the project to be in the best interests of the country, then the United States should back the project from an environmental perspective, protecting Idaho taxpayers from expensive remediation costs in the future. I don't see that anywhere in Perpetua's summaries.

I believe the USFS must also review alternative uses for this area and the associated river systems. In 2018, The Missoulian (Missoula newspaper) made an interesting argument that Montana's revenue from tourism linked to outdoor recreation was significantly higher than revenue from mining. It also provided more jobs. Thus, a

case can be made that not regulating mining will both cost economic opportunities and threaten the environment and human health. The USFS should comment on the economies associated with tourism versus mining.

Finally, the Stibnite project site duration is estimated at about 20 years, including construction, operation, and reclamation. However, the true life of a mining project is centuries. Mines don't go away and the exposed contaminants within the exposed ore leach through the ore with rainwater and snowmelt until those contaminants are expended.

The Stibnite Mine project is not in an appropriate location for a heap-leach mining operation. Please use the USFS to protect this area.

I look forward to your response addressing these concerns.

Sincerely,

Charles Mandeville