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Organization: Stallion Gold Corp.

Title: President

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Dear Forest Supervisor Jackson,

Today, I write to provide comments on the supplemental draft EIS statement for the Stibnite Gold Project. I am a registered professional geologist and have worked extensively across the state over the past four decades on countless mineral exploration properties and projects. I am currently the President of Stallion Gold and have direct experience working in eastern Valley County. I am writing to offer my general support for the Stibnite Gold project and to comment on the thoroughness of the comprehensive document your agency has prepared.

Overall, the supplemental draft EIS is an impressive piece of work. I've been involved in various permitting projects over the years and EIS documents only become more complex and rely on increasingly advanced science and analysis for effects assessment. This document is no exception. What is particularly noteworthy, is that this is the second EIS prepared for this project. Your agency has greatly improved upon both the document and the supporting analysis relative to the 2016 EIS, and most importantly, has worked with Perpetua to develop and scope a significantly improved mine plan. These efforts meet the purpose and need of the proponent while incorporating mitigation measures and considering alternatives to reduce environmental impacts, as required under NEPA. I support your agency's selection of the 2021 Modified Mine Plan for all the reasons outlined in the supplemental draft EIS and urge you to move this project forward by issuing a final EIS and ROD.

Perpetua has been an industry leader when it comes to environmental protections and mitigation measures for mineral exploration work. This is warranted by the close proximity of its deposits to the EF Salmon River, and the high-profile nature of the Stibnite project. In working with state and federal regulators to permit exploration drilling programs, many request that Perpetua's practices be adopted, including use of tanks to contain drilling fluids and placement of spill kits along transportation routes. This innovation and willingness to adopt safety measures above and beyond what is legally required demonstrates that Perpetua has the safety culture and corporate respect for the environment necessary to safely construct and operate the Stibnite Gold Project and to meet its ambitious restoration aspirations for the abandoned Stibnite site.

The soils and reclamation materials section of the supplemental draft EIS executive summary discusses a potential deficit in available restoration materials, and notes that this could be filled with on-site and off-site material. It also notes that "Perpetua's proposed 3000 ppm arsenic limit for suitable root-zone material is high" and that lower limits may be required by the USFS. I've completed countless soil geochemistry surveys for exploration work and I completely agree that the 3000 ppm limit is high. Arsenic concentrations of that magnitude in gold districts are most often found in mineralized, ore-grade rocks, not in soils. Soils directly overlying mineralized areas may have a couple hundred ppm As, which would be considered highly anomalous, but values in the 1000's are rare. The Stibnite site, much like other areas in the Salmon River Mountains, is mantled by deposits of glacial till. These till materials are sourced from upland regions and are usually barren. Exploration soil surveys typically avoid sampling this material as it's typically devoid of pathfinder elements; As, Sb, As, Cu, Pb, Zn, Se, Hg, etc. The glacial deposits on the Stibnite site would provide more than enough reclamation material to meet the deficit and geochemical suitability criteria.

In the socio-economic section of the executive summary, I expected to see the economic impacts of the Stibnite project clearly laid out. I was surprised that the summary economic information didn't tabulate total jobs, local and regional project expenditures, or other statistics pertinent to social and economic conditions. As an elected official in a small rural Idaho community, I understand the importance of high-paying jobs to local residents and local

spending associated with construction and operation of what will be the state's biggest mining operation. This information does appear to be presented in the detailed analysis section 4.21, but this is not accessible to average readers.

The discussion of possible pressures on the housing market is realistic, but I don't believe the potential for "boom and bust" impacts is warranted. First, the Stibnite project will make money hand-over-foot. Based on their Feasibility Study, Perpetua's processing costs are about \$12.50/tonne, with mining at \$2 and general and reclamation costs at \$4, equating to a cut off grade around 0.7 ppm and break-even gold price about \$800. Once Perpetua gets this project permitted and constructed, most of the reserves will be profitable even if gold drops to \$800/oz. There is also plenty of higher-grade material within the deposits which could be preferentially mined to keep the operation up and running and maintain staffing levels should gold prices fall further for extended periods of time. Finally, the staff required to reclaim, restore and close the mine during the closure period is projected at 90 people, which is a significant portion of the local employment during operations. This would greatly mitigate the "bust" impacts upon closure and into the reclamation period.

Another aspect that I found surprising in the executive summary information was the presentation of wetland impacts. The Wetland section has the sub-sections Loss of wetlands, Impacts on wetlands, and Alteration of wetland. Anyone who's been following the project is familiar with the extensive stream restoration work to be completed upon mine-closure, including backfilling the YP pit to re-build and reconnect fish habitat, and other stream enhancements. These aspects of the project are what sets it apart and makes it a win-win for Idaho; privately funded environmental restoration and positive economic benefits. Perpetua's restoration work appears to be only alluded to in the final sentence of the summary section as "permittee responsible on-site mitigation within the SFSR watershed." For a project with such extensive restoration and reclamation goals, I would expect these to be more clearly summarized or otherwise accounted for in the effects analysis.

Overall, the supplemental draft EIS is an excellent document and meets the analysis and disclosure requirements of NEPA. Please consider my comments in preparation of the final EIS, but don't let them further delay the process and realization of the economic development and restoration benefits brought by the Stibnite Project.

Thank you for considering my comments,

William Breen
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