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Organization:

Title:

Comments: Dear Ms. Jackson,

I appreciate this opportunity to comment on the Stibnite Gold Project EIS #50516. As a professional engineer (CA, NV) and environmental expert with over 30 years of experience in mining, I've reviewed or helped develop scores of plans and designs for mining or extracting resources from public lands, nationally and internationally. My focus has generally been on eliminating the potential of mines to impact ground and surface water and on the effective long-term closure of mining facilities. I have been retained by Perpetua Resources, Inc. (Perpetua) as a consultant in these areas.

Perpetua's Stibnite project provides unique benefits to the local, state, and national economies by producing both the critical mineral antimony and the necessary metal gold. While these elements can be extracted in settings all across the globe, each mine presents unique and sometimes considerable risks to the environment and communities. In the case of the Stibnite project, Perpetua and the US Forest Service (USFS) have demonstrated the highest level of due diligence in protecting the communities and precious central Idaho environment in the upper watershed of the East Fork of the South Fork of the Salmon River. Beyond that, this project presents a rare opportunity to right the mistakes of legacy mining that have harmed this watershed and left the fisheries degraded and the waters impacted.

My focus is on water resources. The existing legacy mining in this district is impacting this watershed and will continue to do so for many lifetimes. This project will significantly reverse the mining impacts in this watershed within the project area. This is a rare and exceptional opportunity to improve the environment while adding economic benefits to Idaho and the US. Perpetua has altered its plan to better protect the environment at each step of project planning. This is a true model of economic and environmental benefits achieved hand in glove. All processing facilities will be lined with carefully engineered and redundant containment to isolate them from Idaho's precious water during operations and provide for a stable non-impacting site once the project is finished.

Perpetua, the State of Idaho, and the USFS have worked hard through numerous design iterations and evaluations to make certain that the post-mining (closure) legacy of the Stibnite project is one that returns the site to ecological balance, with lasting improvements to water quality and important fisheries. The tailings itself will be covered and protected with stormwater controls to isolate spent tailings from the surrounding environment and provide for an ecologically sound post-mining feature. The project closure design is well-considered and protective of the basin ecology over the long term.

The Stibnite project upholds the necessary legacy of mining today. This project is an opportunity that the Native American communities, Idahoans, and the US must not pass up to provide for the restoration of this portion of the watershed. Very few mines, globally, have the opportunity to leave a watershed better than they found it. There is no other entity, public or private, realistically ready to or capable of coming to the rescue of this degraded watershed.

I value the great natural beauty and natural resources of central Idaho and believe this plan of operations and well-considered closure plan will mark a permanent improvement in the watershed. I thank you for the opportunity to provide comment on this project and welcome any inquiry.