

Data Submitted (UTC 11): 1/9/2023 4:07:00 PM

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Organization:

Title:

Comments: Dear Ms. Jackson,

I wish to express my support for the Stibnite Gold Project. I have reviewed the October 28th 2022 Supplemental Draft Environmental Impact Statement and wish to comment on the adequacy and thoroughness of the document. I have over 10 years of experience in mining, specifically as a NEPA and permitting specialist. As a NEPA specialist I have worked with federal, state, and local officials on over 200 projects of all types in 15 states. I currently serve as the Permitting NEPA specialist for Integra DeLamar.

The Supplemental Draft is a comprehensive document based on extensive scientific and technical analysis and meets the disclosure requirements of the national environmental policy act. The selection of the 2021 Modified Mine Plan Alternative mitigates environmental impacts relative to the Johnson Creek Route and to other Alternatives analyzed in the August 2020 DEIS. The project modifications that have developed through the NEPA process have resulted in a project plan which will achieve comprehensive site restoration, create hundreds of Jobs, produce the critical mineral antimony and provide economic returns to all stakeholders.

The progression of the Stibnite project through the permitting process is a case study in how NEPA is meant to work. Both the USFS and Perpetua deserve credit for successfully transforming the Stibnite project into what it is today.

The 2020 Draft EIS for the Stibnite Gold Project effectively and comprehensively identified and analyzed environmental impacts resulting from the project. Principal impacts identified included surface disturbances, impacts to stream temperature and stream baseflows and issues with metals leaching to the environment. In response, the project's proposed mine plan was considerably modified on the basis public comments and stakeholder engagement. Overall project modifications, now included in the 2021 MMP Alternative entail a reduction in project disturbance of over 150 acres through elimination of the Fiddle DRSF, complete backfilling of the Hangar Flats pit, re-configuration of the TSF waste rock buttress to reduce habitat impacts, additional riparian planting measures, addition of the stibnite pit lake, and additional water management, use and treatment design elements. Not only are these changes comprehensive, but they are supported by the updated feasibility study for the SGP, demonstrating overall economic viability and effective environmental impacts mitigation of the modified project proposal.

The effects analysis in the supplemental DEIS demonstrates the effectiveness of these project modifications. Relocation of surface water diversions and lined channel reconfigurations collectively reduce effects on baseflow in Meadow Creek. The water quality improvements predicted in Section 4.9.2.2 of the document are attributable to the permanent beneficial impacts to groundwater resulting from removal of mining wastes and updated mine closure plans entailing additional low permeability covers. Maximum stream temperatures remain within one degree below or above existing conditions in most stream segments on site due to piping and revegetation prescriptions. The removal of fish barriers and other habitat enhancements discussed in Section 4.12.2.2 are noted to directly benefit Chinook salmon and steelhead, as well as increasing habitat connectivity for bull trout. In addition to project modifications, environmental predictive models were also updated relative to the DEIS analysis to address issues identified in the prior comment period. Additional bedrock aquifer testing and updates to the hydrological model, as well as inclusion of comprehensive management plans and treatment, demonstrate that the project will be able to successfully manage water on site, which is one of the most important considerations for mining projects in temperate mountainous settings.

All of these benefits are delivered to the site in conjunction with site restoration and rehabilitation while creating hundreds of direct jobs and significant ancillary economic stimulus for Idaho. To realize these positive benefits to communities and the environment, I urge you to finalize the EIS and issue a positive Record of Decision authorizing the Stibnite Gold Project.

Sincerely,

Tricia LaRue

