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Comments:
US Forest Service,

I am writing as a fifth generation Idahoan and an employee of Perpetua Resources. I am raising three children in Idaho just as my parent's raised me - with respect for Idaho's wild places and a hope that they too will continue to call Idaho their home as they raise their own families here one day.

Thank you for this opportunity to comment on the Stibnite Gold Project (Project). The ability for the public to review, pose questions, and provide suggestions to improve the project and reduce potential impacts is a testament to both the National Environmental Policy Act and the value of American civic engagement.

As I review the Supplemental Draft Environmental Impact Statement, it is clear that six years of public feedback, scientific analysis, and regulatory inquiry have exhausted review of the feasible alternatives and found the best path forward for the development of the Stibnite Gold Project. The Supplemental finds that the Modified Mine Plan is the preferred alternative because it has reduced the project's impact, improved water quality and water temperature, and provides the safest transportation route to the site.

The NEPA process has identified, eliminated, mitigated, and provided direction for managing the impacts and risks associated with the Project. From reducing the project footprint by 13%, traffic by 23%, and mercury emissions by 60%, to identifying the safest road, location for the tailings storage facility, and water management practices - the DEIS and the SDEIS have taken every possible measure to ensure the Project is developed under the best possible design to protect the environment and surrounding communities.

Mining is not without impacts. But unique to the Stibnite Gold Project are the untenable impacts of no action - which are far more real, immediate, and profound than the well managed impacts or hypothetical remaining risks of redeveloping Stibnite.

Without the Stibnite Gold Project, there are no identified feasible solutions to improve water quality, reconnect fish access, or repair river habitat at this abandoned site. Without the Project, the site will sit as it does today - leaching arsenic into the East Fork South Fork Salmon River, with poor habitat conditions, and Chinook, steelhead and bulltrout will still be blocked from miles of historical habitat. Without the Stibnite Gold Project, our country will have no domestic supply of antimony trisulfide likely to meet military specifications. Without the Project, our nation will be at the whim of our adversaries China and Russia for the foundational equipment to defend our nation and keep the American soldier safe. Without the Stibnite Gold Project, the liquid metal battery technology being commercialized by Ambri will have to rely on foreign mined sources of antimony for the foreseeable future. Without the Project, the clean energy transition will continue to be reliant on fragile foreign supply chains. In these regards, the very real harms of "no action" far outweigh the impacts of moving the Modified Mine Plan forward.

I also want to highlight some of the steps Perpetua Resources has taken to meet President Biden's call for responsible critical mineral development. Not only have we recognized that the redevelopment of the historical Stibnite mining district would require prioritizing environmental cleanup of legacy features that we did not create, but we have recognized that we must prove ourselves to be a trusted community partner. Therefore, transparency and accountability have informed our actions since day one. Since 2014, we've offered over 200 tours of the project location, hosted 50+ office hours since 2018, participated in over 1,000 community discussions and volunteered over 13,000 hours since 2015. We've engaged proactively with ENGO groups.

We've proactively sought input from Idaho's Tribal Nations. We formed the Stibnite Advisory Council as a permanent forum for the exchange of information, providing communities access to the executive leadership and technical experts within the company on a monthly basis as an opportunity for the public to have their questions answered, raise concerns, identify opportunities and just simply be aware of what is happening on the Project. This group just recently started a citizen's water monitoring program as a way to provide ongoing insight into the conditions of water at Stibnite.

We have also conducted our business with an open mind and willingness to find solutions where needed. Whether it be the access road through Stibnite or our commitment to keep traffic to weekdays whenever possible, we have a track record of and we remain open to collaboration. Our actions and our committments can be found in our annual sustainability reports https://perpetuaresources.com/wp-content/uploads/Perpetua-Resources-2021-Sustainability-Report.pdf and our sustainability roadmap https://perpetuaresources.com/wp-content/uploads/2022-Perpetua-Sustainability-Roadmap.pdf

Upon reading other public comments, I would highlight one in particular. By claiming that it would take centuries or millennia to meet FS standards for soil productivity, the writers assumed worst case conditions and on focused on failures in previous reclamation efforts in the site area (and Thunder Mountain) and ignored critical factors, including:
-The fact that some of the work was successful, including relatively recent work by Perpetua on various drill pads and road obliteration, Hecla at Homestake pit, and USFS in lower Meadow Creek;
-Perpetua Resources has committed to testing, trials, and progressive closure;
-Reclamation of mine sites in similar environments has been done successfully for several decades now in British Columbia, Alaska and other alpine climates as well as southeast Idaho;
-The long-term commitment is not 5 or 10 years as the writers imply, but until closure goals (including regulatory ones) are met; and,
-A changed environment after mining may not be exactly the same as pre-mining, but it can still be productive.

The Reclamation and Closure Plan is a good example of what good practice requires at this stage in the mine life cycle and with respect to some aspects (detail, commitments to progressive closure, legacy cleanups, commitment to manage water and monitor until goals achieved) it exceeds international good practice.

The Stibnite Gold Project will redevelop an abandoned mine site and leave a net benefit to many environmental resources. The Project will produce the only domestic reserve of a mineral absolutely critical to our national security and our energy future. The Project has been studied by regulators, been made available for public review, and been improved by public feedback for over six years. It is undisputed and accepted on both sides of the political spectrum that the American economy, national defense, and clean energy future require domestic production of the minerals and metals we need. So, knowing all of this, the question that remains is "if not here, then where?"

I commend the US Forest Service's attention and dedication of resources to the thorough evaluation of the Stibnite Gold Project. I urge the agency to move toward a FEIS and final ROD without delay.

Best,

Mckinsey