



ALTERNATIVE 2

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When the DEIS was released by the U.S. Forest Service in August of 2020, our company was called Midas Gold. Since then, we have changed our name to better reflect our values and our project. Today, we are proud to be Perpetua Resources.

ALTERNATIVE 2

The National Environmental Policy Act (NEPA) is a lengthy and rigorous process of data collection and scientific review and analysis. Throughout the multi-year process many local, state and federal regulators along with Tribes and stakeholders are given the opportunity to review and suggest changes to a proposed plan.

Throughout the NEPA process, Midas Gold has been focused on listening to the data and regulators and stakeholders to identify and make refinements and improvements to our original plan, the Plan of Restoration and Operations (PRO) which was submitted to the U.S. Forest Service in 2016.

In May of 2019, Midas Gold submitted a modified version of the PRO to the U.S. Forest Service for their consideration. This “ModPRO” was then adapted and considered as Alternative 2 in the U.S. Forest Services’ Draft Environmental Impact Statement (DEIS). Alternative 2 directly improves Midas Gold’s plan and is our preferred option as the best plan for the Stibnite Gold Project.

As seen in Alternative 2, Midas Gold made several important updates to its development rock storage facilities to reduce impacts to salmon habitat, increase safeguards around subeconomic mineralized development rock storage, cut the distance mined minerals are moved on site and to preserve more areas in the valley for wetland restoration.

- Removing a proposed development rock storage facility and reducing new project disturbance by 72 acres;
- Backfilling the Midnight mine pit and partially backfilling the Hangar Flats mine pit to reduce the future pit lake to a depth of 140 feet, from original depth of 600 feet; (See: U.S. Forest Service, Draft Environmental Impact Statement (DEIS); Table 2.2-1; pg. 2-9)
- Adding geosynthetic covers to development rock storage facilities to limit infiltration and



ALTERNATIVE 2

and protect water quality;

- Surface water management modifications to maintain surface water flows, reduce stream temperature and improve surface water and groundwater quality;
- Moving the proposed road maintenance facility location to the Burntlog Route to protect the historic nature of the Landmark area;
- Rerouting sections of the powerline to reduce wetland impacts and address private landowner concerns;
- Modifying the Burntlog Route to reduce the road length by over 1 mile and substantially reduce wetland impacts;
- Reduction in overall traffic by more than 20%, during operations, and related emissions by producing lime on site from our own limestone;
- Maintaining safe, seasonal recreational access through the proposed mine site during operations.

ALTERNATIVES

- The Draft Environmental Impact Statement reviews 5 alternatives. (See: *DEIS; Chapter 2*)
- **Alternative 1** is the original Plan of Restoration and Operations proposed by Midas Gold in 2016.
- **Alternative 2** is the modified Plan of Restoration and Operations (ModPRO) proposed by Midas Gold in 2019.
- **Alternative 3** places the Tailings Storage Facility in a pristine reach of the East Fork South Fork Salmon River.
- **Alternative 4** uses existing roads, both Johnson Creek and Stibnite Road, for mine traffic to access the project rather than the Burntlog Road option in Alternatives 1, 2 and 3.
- **Alternative 5** is a no action alternative and Stibnite would remain as it is today.

ALTERNATIVE 2 DETAILS

- Under Alternative 2, Midas Gold would operate a lime kiln onsite, which would reduce the impact of the Project by eliminating the need to truck large volumes of lime to site. The change will reduce traffic into the Project site by approximately 20 percent compared to the original plan, eliminating 7 large trucks per day from the access roads to site.



ALTERNATIVE 2

- In Alternative 2, an extra layer of liner would be added to the tailings storage facility to further reduce the chances of trace metals from escaping our 100 million-ton tailings storage facility.
- Midas Gold has proposed new alternatives to better manage surface water routes to improve both ground and surface water quality and quantity. Efforts include:
 - Creating a water diversion channel for Hennessy Creek away from legacy rock dumps, which currently degrades water quality; and
 - Extending the liner under Meadow Creek more than 1,000 feet past the Hanger Flats Pit in order to reduce potential water loss into groundwater and maintain consistent stream flows.
- Alternative 2 includes Midas Gold moving the road maintenance facility to another location, approximately 4 miles up Burntlog Road from the original location proposed at Landmark. By moving the maintenance facility, Midas Gold would utilize land it is already proposing to use as a gravel quarry and protect the historic nature of Landmark by avoiding building modern infrastructure nearby.
- In Alternative 2, Midas Gold has proposed changes to the Burntlog Road route that are safer for personnel and reduce impacts on the environment. In the modified route, Midas Gold:
 - Avoids known geohazards, sections that are too steep or corners that were previously too sharp. By having a more efficient route into the site, Midas Gold will also reduce fuel consumption and related greenhouse gas emissions;
 - Avoids wetlands, reducing environmental impacts.
- Originally, Midas Gold did not plan to provide public access through the site to Thunder Mountain because of safety concerns. However, after hearing from the public, the company realized this was an important issue for the community of Yellow Pine and worked to identify a potential solution that still prioritized safety. As a result, in Alternative 2 Midas Gold proposed maintaining seasonal access through the site by routing traffic on a road through or near the upper portions of the Yellow Pine pit, similar to the levels of access today.
- Alternative 2 also includes plans to reroute powerlines to reduce wetland impacts and address private landowner concerns.
- In contrast to Alternative 3, which proposes placing the Tailings Storage Facility in a pristine reach of the East Fork South Fork Salmon River and would leave the spent ore disposal area



ALTERNATIVE 2

(SODA) and underlying mine tailings in place, Alternative 2 places the proposed Tailings Storage Facility in an area already heavily impacted by mining activity and cleans up the historical tailings. The location proposed in Alternative 2 is also safer from geohazards and will have a smaller over all disturbance footprint than the areas of the East Fork of the South Fork of the Salmon River as proposed in Alternative 3.

- In contrast to Alternative 4, which proposes site access stay along both Johnson Creek Road and Stibnite Road, Alternative 2 places the site access road away from other drivers and users on South Fork and Johnson Creek Roads and avoids existing routes that parallel major fish bearing waterways, reducing the risk of potential spills and minimize sediment delivery to waterways and avoids known winter avalanche sites.

CONCLUSION

After years of scientific analysis and review the U.S. Forest Service and multiple state and federal agencies conclude in the Draft Environmental Impact Statement (DEIS) that the mitigation and restoration plans proposed by Midas Gold will assist the population of bull trout, steelhead and chinook salmon and improve water quality.

Specifically, the report concludes that **removing historical barriers to fish migration is beneficial to the population.**

- Long-term access to historically blocked critical habitat would result in **increased productivity** (DEIS; Ch 4.12; Fish Resources - 4.12-39)
- Free movement and access to habitat can **improve genetic diversity** of isolated populations (DEIS; Ch 4.12; Fish Resources - 4.12-39)
- Increased access to feeding and refuge areas in critical habitat can **improve overall productivity** (DEIS; Ch 4.12; Fish Resources - 4.12-39)
- Restoration plans will also provide a **net gain of 21,941 stream functional units, a 23% increase** in the quality habitat these species need (DEIS; Appendix D; Table 8-1)

Additionally, the report identifies that removing legacy waste from historic mining will improve water quality.

- Removing legacy tailings and managing water quality provides long-term reduction in metal



ALTERNATIVE 2

loading in ground and surface water (DEIS; Ch. 4; Section 4.9)

- Removing legacy tailings and waste lowers concentrations of antimony and arsenic in the East Fork South Fork of the Salmon River (DEIS; Ch 4; pg. 4.9-70)
- Removing legacy tailings and waste improves water quality in Meadow Creek Valley (DEIS; Ch. 4; 4.12 pg. 103-104)

The DEIS also concludes that the concurrent mitigation and restoration offered in Alternative 2 reduces the uncertainty in the duration of wetland and riparian resource losses. (DEIS; Ch 4; Section 4.11.3.1.1; pg. 4.11-53)