Forest Service
U.S. DEPARTMENT OF AGRICULTURE

50516
Region 4

January 2025
Payette and Boise National Forests

Stibnite Gold Project

Final Environmental Impact Statement

Errata

Cover photo: Yellow Pine pit. Midas Gold, Stibnite Gold Project Plan of Restoration and Operations September 2016.

The United States Department of Agriculture (USDA) is committed to making its digital content accessible. USDA customers, employees, job applicants, and members of the public with disabilities must have access to information and communication technology (ICT) comparable to the access available to those without disabilities. The U.S. Access Board ("Access Board") is responsible for developing accessibility standards. In 2017, the Access Board published a Final Rule that updated the accessibility requirements in Section 508 of the Rehabilitation Act of 1973 (Section 508), 29 U.S.C. 794d, and refreshed the guidelines in the law. The Final Rule went into effect on January 18, 2018. The standards are available at Information and Communication Technology: Revised 508 Standards and 255 Guidelines.

For more information, see the USDA Accessibility Statement.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3): mail to: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Stibnite Gold Project Final Environmental Impact Statement Errata Document

1. Introduction

The Stibnite Gold Project Draft Record of Decision and the Final Environmental Impact Statement (FEIS) were released on September 6, 2024. This errata sheet documents corrections to the text of the September 2024 published FEIS and should be reviewed along with the FEIS. These corrections reflect instructions provided by Kelly Orr, the Intermountain Region Deputy Regional Forester, in the response to objections dated October 21, 2024, and additional clarifications. These corrections are consistent with the direction given in Forest Service Handbook 1909.15, Chapter 10, Section 18. There are no changes to the project or significant new circumstances identified in this errata sheet that affect the analysis and conclusions in the Stibnite Gold Project FEIS, therefore, a supplement to or revision of the FEIS is not needed. These changes also apply to the Stibnite Gold Project specialist reports, as applicable.

Article II. Chapter 2

1. FEIS, Chapter 2, Section 2.4.4.4 Public Access (page 2-20)

The description regarding seasonal public access through the operating mine site to Thunder Mountain Road is modified per the italicized text:

During operations, the public access road through the Operations Area Boundary would provide seasonal use, open to all vehicles; access would not be provided in winter when impassable (current county maintenance standards) and signs would inform the public of seasonal and temporary closures. Public vehicles passing through would be required to check-in with mine personnel at the North or South SGP entry points and would receive a safety briefing and would also be required to check-out with SGP personnel upon exiting the SGP. For safety purposes, public access would be separated from other SGP roads by berms, security fencing, and the underpass to allow the public road to pass beneath the mine haul road. No stopping or deviating from the public access road would be allowed. Perpetua could restrict access to any vehicles due to concerns related to public or employee health and safety, such as during road construction and maintenance, blasting, highwall scaling, mining in the immediate area of the road, and similar operations. *Because public use of the road would be subject to Perpetua's control measures on general use, the public access road is not considered a public road.*

Significance: The addition clarifies the status of the access road through the site with regard to whether it will be operated as a public road.

2. FEIS, Chapter 2, Section 2.4.9 Environmental Design Features (Table 2.4-12 on page 2-106)

An environmental design feature used in the wildlife specialist report effects analysis unintentionally omitted from Table 2.4-12. The following row is added into Table 2.4-12 on page 2-106.

Description	Type	Reference	Resources Affected
To the extent possible, trees and snags found to contain nesting cavities would not be disturbed or cut. No trees with active nests would be cut. Exceptions: Mine Site and New Road Construction: Land clearing activities in areas where complete vegetation removal (greater than 0.5 acres) is necessary, these activities would not occur until after the bird breeding season (March 1 through July 30th) for migratory and resident birds. Power line construction and upgrades: Land clearing activities in areas where complete vegetation removal is necessary would not occur until after the bird breeding season (March 1 through July 30th) for migratory and resident birds.	Design Feature	BNF and PNF: Developed in response to WIST03; EO 13186	Wildlife

Significance: The addition reflects the requirement for nest avoidance that will be applied to the Project and makes the FEIS Table 2.4-12 consistent with the specialist report effects analysis.

3. FEIS, Chapter 2, Section 2.4.9 Environmental Design Features (Table 2.4-13 on page 2-110).

The following row is modified by adding the italicized text in Table 2.4-13 on page 2-110:

Description	Resources Affected
The Meadow Creek channel would be routed over the final tailings storage facility and tailings storage facility embankment and buttress, resulting in a long, relatively flat surface and a short, steep face. On top of the tailings storage facility surface, Meadow Creek would be contained within a broad floodplain corridor bound laterally by erosion-resistant terraces and vertically by a subsurface armor layer over a low-permeability *geosynthetic* stream liner. *Design thicknesses of the reclamation material and armor layer were selected to be protective of the geosynthetic stream liner under post-closure weather, vegetation, and flow conditions.*	Fish, Wetlands

Significance: The added text clarifies that the stream liner will be constructed from a geosynthetic material with a design cover that protects its integrity and ability to inhibit water flow.

The design of the liner and its cover are consistent with practices in place for functioning liners (Bouazza 2002; Geosynthetic Institute 2013). The effects of revegetation roots on liners are limited by the design and materials because roots by their nature and purpose locate and extract water from the subsurface for plant transpiration. Any individual root punctures of a liner generally have little effect on liner hydraulic conductivity (Rowe 2020).

4. FEIS, Chapter 2, Section 2.4.9 Environmental Design Features (Table 2.4-13 on page 2-110).

The following row is modified by adding the italicized text in Table 2.4-13 on page 2-110:

Description	Resources Affected
Perpetua would lead annual site visits for USACE, EPA, IDFG, and other interested agency personnel as needed to facilitate agency review of mitigation areas if desired. Final reporting and data archival requirements would be subject to permit conditions; however, it is anticipated that until the USACE concurs that mitigation sites meet success criteria, monitoring reports would be prepared by Perpetua annually and submitted to USACE Walla Walla District, EPA, IDFG, IDL, National Oceanic and Atmospheric Administration (NOAA) Fisheries, USFWS, the Forest Service, *affected Tribes*, and other interested agencies, SGP partners, and stakeholders. After success criteria are met, permit conditions will set the frequency for long-term monitoring and reporting.	Fish, Wetlands

Significance: The addition clarifies that affected Tribes will be submitted the annual monitoring reports for the project and does not change any analysis conclusions.

Article III. Chapter 3

1. FEIS, Chapter 3, Section 3.3.3 Air Quality Relevant Laws, Regulations, Policies, and Plans (Table 3.3-1 on page 3-35).

The Primary National Ambient Air Quality Standards (NAAQS) for annual PM2.5 is changed from 12 g/m3 to 9 g/m3 as shown in bold and italic text.

Table 3.3-1 National Ambient Air Quality Standards

Pollutant and Averaging Time	Primary NAAQS	Secondary NAAQS	Exceedance Criteria
CO, 8-Hour	9 ppm	N/A	Not to be exceeded more than once per year
CO, 1-Hour	35 ppm	N/A	Not to be exceeded more than once per year
Lead, 3-month	0.15 µg/m3	0.15 µg/m3	Not to be exceeded by the rolling 3-month average
NO2, Annual	53 ppb	53 ppb	Not to be exceeded by the average of the 1-hour concentration in a calendar year
NO2, 1-Hour	100 ppb	N/A	98th percentile of 1-hour daily maximum concentration, averaged over 3 years
O3	0.070 ppm	0.070 ppm	Annual 4th highest daily maximum 8-hour concentration, averaged over 3 years
PM2.5, Annual	***9*** µg/m3	15 µg/m3	Annual mean, averaged over 3 years
PM2.5, 24-Hour	35 µg/m3	35 µg/m3	98th percentile, averaged over 3 years
PM10, 24-Hour	150 µg/m3	150 µg/m3	Not to be exceeded more than once per year on average over 3 years
SO2, 3-Hour	NA	0.5 ppm	Not to be exceeded more than once per year
SO2, 1-Hour	75 ppb	N/A	99th percentile of 1-hour daily maximum concentration, averaged over 3 years

Significance: The U.S. Environmental Protection Agency revised the Primary NAAQS for annual $PM_{2.5}$ on May 6, 2024, following development of the FEIS document but prior to the issuance of the Final Record of Decision. The change in the standard does not affect the effects analysis in the FEIS because $PM_{2.5}$ concentrations are expected to meet the revised standard.

Article IV. Chapter 4

1. FEIS, Chapter 4, Section 4.2.3 Geologic Resources and Geotechnical Hazards Mitigation Measures (page 4-22 to 4-23)

The mitigation measure is modified by adding the italicized text:

> Perpetua would be responsible for convening and utilizing an Independent Tailings Review Board per the Global Industry Standard on Tailings Management with a focus on:
>
> - achieving design criteria for geotechnical stability of the tailings storage facility embankment and buttress during design, construction, and operation *including design components to prevent effects from facility liquefaction and control effects from any local landslide and avalanche hazards*;
> - achieving design tailings containment and environmental performance goals during design, construction, and operation; and
> - managing tailings deposition in a way conducive to implementing closure-period process solution management and reclamation plans for the facility.

Significance: The added text explicitly covers design considerations for liquefaction, landslides, and avalanche hazards. The design considerations for liquefaction are covered in the pseudo static Factor of Safety analysis for the facility (Tierra Group 2021) and the geological hazards assessment for the site (STRATA 2014a).

2. FEIS, Chapter 4, Section 4.9.3 Water Quality Mitigation Measures (page 4-302).

The mitigation measure is modified by adding the italicized text:

> **Monitoring Measure - Water Resource Monitoring Plan Implementation:** Because construction, operation, and closure of the proposed Stibnite Gold Project has potential to impact surface or groundwater resources, a focused Water Resources Monitoring Plan would be developed by the proponent. Perpetua would be responsible for the implementation of the Water Resources Monitoring Plan for any approved action incorporating the confirmation of predicted surface water and groundwater chemistry plus surface water temperature *and sediment parameters*. The plan would include mined development rock and ore, surface water, groundwater, and meteorological monitoring requirements. Monitoring results would be provided to the Forest Service on a quarterly basis and summarized in an annual report. Perpetua would be responsible for continued monitoring and reporting of surface and groundwater chemistry and temperature prior to, during, and after operations in the post-reclamation period until the Forest Service accepts the reclamation has demonstrated efficacy in accomplishing the results as predicted as outlined in the EIS. The plan would be reviewed and approved by the Forest Service and implemented prior to the commencement of mining. State authorizations may also have monitoring requirements and these requirements along with monitoring already conducted or proposed could be applied to satisfy the needs of this mitigation measure.

Significance: The added text explicitly reflects the intent to monitor sediment in surface waters as part of the water quality monitoring.

3. FEIS, Chapter 4, Section 4.9.3 Water Quality Mitigation Measures (page 4-303).

The mitigation measure is included by adding the italicized text:

(i) Tailings Supernatant Pond Water Quality

Issue*: The detoxified process water in the supernatant pond at the surface of the tailings storage facility would be a driver for operational water quality protections and closure water treatment requirements.*

Monitoring Measure – Tailings storage facility supernatant water sampling and analyses: *Water quality samples would be collected and analyzed by Perpetua on at least a quarterly basis to characterize water quality and constituent concentrations relative to design levels for operational water quality protections and closure water treatment.*

Significance: The added mitigation measure explicitly reflects the intent to monitor the water quality of the supernatant pond containing process water located on top of the tailings storage facility while operating.

4. FEIS, Chapter 4, Section 4.10.2.2 Sensitive and Forest Watch Species (page 4-313 to 4-315) and Vegetation Specialist Report Section 7.2.3.5 (page 67 to 70).

Impacts to Known Locations of Sensitive and Forest Watch Species sub-section is modified per the italicized text:

Construction of the 2021 MMP would impact several known occurrences of sensitive and forest watch plant species as described in the following subsections.

(i) Bent-flowered Milkvetch (Astragalus vexilliflexus var. vexilliflexus)

Several subpopulations of a single occurrence of bent-flowered milkvetch, a PNF forest watch species, occur to the east of the SGP (IFWIS 2017; Mancuso 2016). One of the bent-flowered milkvetch subpopulations (the Cinnabar Peak subpopulation) extends from approximately one-quarter mile to approximately 300 feet upslope of the West End Creek diversion (Mancuso 2016).

The 2021 MMP could impact the Cinnabar Peak subpopulation due to its proximity to the West End Creek diversion. The most likely impact of the SGP on this subpopulation would be dust associated with construction of the West End Creek diversion, which could travel upslope and impact this subpopulation or its pollinators. Impacts of dust on the Cinnabar Peak subpopulation could range from mild metabolic inhibition or inhibition of pollination to mortality of individuals; dust also could inhibit pollination success (Farmer 1993). These impacts may result in reduced viability of the species in the planning area.

The area of potential exploratory drilling overlaps with subpopulations of this species. Exploratory drilling within this area has the potential to impact this species directly through removal or crushing and/or via dust deposition or impacts to pollinators.

However, based on the implementation of required and proposed protection measures presented in **Section 2.4** particularly those related to sensitive plant species *in the vegetation section for avoiding Forest Watch species and incorporating measures to ensure the habitat is maintained or restored and coordination with the Forest Botanist*, dust control *such as application of dust control binding agents and water outlined in the fish-sediment, vegetation – whitebark pine, water resources, and road use and maintenance sections and* topsoil and vegetation management *such as noxious weed controls, use of certified weed free materials, re-vegetation of soils exposed by ground disturbance, soil stability/erosion monitoring, and spill response planning and measures*, would reduce impacts to bent-flowered milkvetch and its habitat.

The combination of these potential impacts *and the required and proposed protection measures* would result primarily in localized, minor, long-term, and permanent, impacts to the bent-flowered milkvetch. Therefore, the 2021 MMP may indirectly impact bent-flowered milkvetch individuals (one out of a total of approximately 653 individuals within 10 populations identified on the PNF) and habitat but *is not expected to* contribute to a loss of viability of the species within the planning area (i.e., PNF-administered lands).

(ii) Least Moonwort (Botrychium simplex)

Two subpopulations of a single occurrence of least moonwort, a Forest Service sensitive species on the PNF and a forest watch species on the BNF, are located in swales adjacent to Johnson Creek Road (County Road [CR] 10-413) (IFWIS 2017) in the BNF. Increased vehicle travel on this road associated with SGP activities would increase dust impacts that could impact these subpopulations and the swale habitat they occur in as compared to current conditions. Maintenance work on this road, such as ditch and culvert repair and adding gravel to the road surface also could increase dust impacts as well as increase impacts associated with potential hydrologic alterations on these subpopulations and associated swales. These subpopulations were not observed by Forest Service surveyors in the most recent survey year (2005) (IFWIS 2017); however, if they still exist, increased dust deposition could result in impacts ranging from metabolic inhibition or mortality of individuals (Farmer 1993).

However, based on the implementation of required and proposed protection measures presented in **Section 2.4** particularly those related to sensitive plant species *in the vegetation section for avoiding Forest Watch species and incorporating measures to ensure the habitat is maintained or restored and coordination with the Forest Botanist*, dust control *such as application of dust control binding agents and water outlined in the fish-sediment, vegetation – whitebark pine, water resources, and road use and maintenance sections and* topsoil and vegetation management *such as noxious weed controls, use of certified weed free materials, re-vegetation of soils exposed by ground disturbance, soil stability/erosion monitoring, and spill response planning and measures.*, would reduce impacts to the least moonwort.

Therefore, the 2021 MMP may indirectly impact least moonwort individuals (two out of a total of approximately 1,731 individuals in 14 populations on the *BNF*) and habitat but *is not expected to* contribute to a loss of viability of the species within the planning area (i.e., BNF-administered lands).

(iii) Blandow's Helodium (Helodium blandowii)

Although there are other occurrences of this species outside the analysis area, within the analysis area, a single occurrence of Blandow's helodium, a forest watch species on both the PNF and BNF, is found in near Trapper Creek, within approximately 100 feet from where the Burntlog Route would cross the Trapper Flat wetland in the BNF (IFWIS 2017). Construction of the road in this area could impact hydrology of the wetland that this species inhabits, which could result in conditions that would not support this occurrence.

The SGP also could impact this occurrence due to dust associated with construction of the road and vehicle travel in this area. Increased dust deposition could result in impacts ranging from metabolic inhibition to mortality of individuals (Farmer 1993).

However, based on the implementation of required and proposed protection measures presented in **Section 2.4** particularly those related to sensitive plant species *in the vegetation section for avoiding Forest Watch species and incorporating measures to ensure the habitat is maintained or restored and coordination with the Forest Botanist*, dust control *such as application of dust control binding agents and water outlined in the fish-sediment, vegetation – whitebark pine, water resources, and road use and maintenance sections and* topsoil and vegetation management *such as noxious weed controls, use of certified weed free materials, re-vegetation of soils exposed by ground disturbance, soil stability/erosion monitoring, and spill response planning and measures*, would reduce impacts to Blandow's helodium and its habitat.

The combination of these potential impacts *and the required and proposed protection measures* would result primarily in localized, long-term and permanent, moderate impacts to the Blandow's helodium. Therefore, the 2021 MMP may indirectly impact Blandow's helodium individuals (one) but *is not expected to* contribute to loss of viability of the species within the planning area (i.e., *PNF and* BNF-administered lands).

(iv) Sweetgrass (Hierochloe odorata)

There are occurrences of this species outside the analysis area with two subpopulations of a single occurrence of sweetgrass *just beyond the analysis area* located in wetlands near Trapper Creek, the closest being approximately 780 feet and the farthest being 1,000 feet from new construction for the Burntlog Route in the BNF (IFWIS 2017). This species is in an area that is hydrologically connected to wetlands that would be impacted by construction of the Burntlog Route, and therefore, it is considered to be within the analysis area. Construction of the Burntlog Route through the wetlands in this area could impact hydrology of the wetland that this species inhabits, which could result in conditions that would not support these subpopulations.

However, based on the implementation of required and proposed protection measures presented in **Section 2.4**, particularly those related to sensitive plant species and wetlands, such as stormwater and sediment management, use and transportation of chemicals, and soil stabilization, as well as topsoil and vegetation management, impacts to sweetgrass and its habitat would be reduced. Further, the Compensatory Stream and Wetland Mitigation Plan (Tetra Tech 2023) provides detailed descriptions of proposed restoration, establishment, enhancement, and/or preservation of aquatic resources to compensate for unavoidable impacts to wetlands. This potential impact would result primarily in localized, long-term and permanent, minor impacts to sweetgrass. Therefore, the 2021 MMP may indirectly impact sweetgrass individuals (two) and habitat but *is not expected to* contribute to loss of viability of the species within the planning area (i.e., BNF-administered lands).

(v) Sacajawea's Bitterroot (Lewisia sacajaweana)

Although there are other occurrences of this species outside the analysis area, within the analysis area, one occurrence of Sacajawea's bitterroot, a Forest Service sensitive species on both the PNF and BNF, occurs approximately 300 feet above Warm Lake Road (CR 10-579) and the existing transmission line corridor near the intersection of Warm Lake Road with Curtis Creek Road (IFWIS 2017) in the BNF. This occurrence is on a hillside above a portion of Warm Lake Road, and the polygon for this occurrence overlaps a transmission line access road that would be used during transmission line reconstruction and SGP operation. Spur road construction and use of this dirt road during transmission line reconstruction and SGP operation would create dust that could negatively impact this occurrence of Sacajawea's bitterroot. Impacts of dust on this species could range from mild metabolic inhibition to mortality of individuals (Farmer 1993).

However, based on the implementation of required and proposed protection measures presented in **Section 2.4** particularly those related to sensitive plant species *in the vegetation section for avoiding Forest Watch species and incorporating measures to ensure the habitat is maintained or restored and coordination with the Forest Botanist*, dust control *such as application of dust control binding agents and water outlined in the fish-sediment, vegetation – whitebark pine, water resources, and road use and maintenance sections and* topsoil and vegetation management *such as noxious weed controls, use of certified weed free materials, re-vegetation of soils exposed by ground disturbance, soil stability/erosion monitoring, and spill response planning and measures*, would reduce impacts to the Sacajawea's bitterroot.

Therefore, the 2021 MMP may indirectly impact Sacajawea's bitterroot individuals (one out of approximately 157,023 individuals in 27 populations on the PNF) and habitat but *is not expected to* contribute to a trend towards ESA listing or loss of viability of the species within the planning area (i.e., *PNF and* BNF-administered lands).

(vi) Rannoch-rush (Scheuchzeria palustris)

Although there are other occurrences of this species outside the analysis area, within the analysis area, one occurrence of Rannoch-rush, a forest watch species on the BNF, is located in a wetland in the Mud Lake area in the BNF (Idaho Department of Fish and Game 2004; IFWIS 2017). This occurrence is within 300 feet of an existing portion of Burnt Log Road (National Forest System Road [FR] 447). This occurrence is likely to be impacted by dust associated with road widening and vehicle travel on the Burntlog Route in this location. This occurrence also could be subject to other potential indirect effects described in **Section 7.2.1.1**, under Indirect Impacts. The most likely impact of the SGP on this occurrence is dust associated with construction of the road and vehicle travel in this area. Increased dust deposition could result in impacts ranging from metabolic inhibition or mortality of individuals (Farmer 1993).

However, based on the implementation of required and proposed protection measures presented in **Section 2.4** particularly those related to sensitive plant species *in the vegetation section for avoiding Forest Watch species and incorporating measures to ensure the habitat is maintained or restored and coordination with the Forest Botanist*, dust control *such as application of dust control binding agents and water outlined in the fish-sediment, vegetation – whitebark pine, water resources, and road use and maintenance sections and* topsoil and vegetation management *such as noxious weed controls, use of certified weed free materials, re-vegetation of soils exposed by ground disturbance, soil stability/erosion monitoring, and spill response planning and measures*, would reduce impacts to the Rannoch-rush.

Therefore, the 2021 MMP may indirectly impact Rannoch-rush individuals (one) and habitat but *is not expected* to contribute to loss of viability to the species within the planning area (i.e., BNF-administered lands).

Significance: The added text clarifies that the discussed occurrences are related to the Project's analysis area and do not reflect all the occurrences of the species on the forests. The added text further explains which specific environmental design features would reduce impacts to the species rather than references to an entire table. The added text also clarifies that loss of viability within the planning area due to Project effects is not expected. The added text does not change the analysis conclusions.

5. FEIS, Chapter 4, Section 4.10.3 Vegetation Mitigation Measures (page 4-329).

The mitigation measure is included by adding the italicized text:

> ***(i) Forest Watch Species***
>
> ***Issue****: Exploration ground disturbance may affect Forest Watch species.*
>
> ***Mitigation Measure – Botanical Surveys****: Prior to any ground disturbance associated with exploration activities, a botanical survey would be conducted to determine whether Forest Watch species are present. If detected, the ground disturbance area for the exploration activities would be modified to avoid the Forest Watch species present.*

Significance: The added mitigation measure explicitly reflects the intent to conduct pre-disturbance biological surveys by clarifying the commitment described in Perpetua's 2021 Modified Mine Plan, Table 4-2.

6. FEIS, Chapter 4, Section 4.11.3 Wetlands and Riparian Resources Mitigation Measures (page 4-350).

The mitigation measure is modified by adding the italicized text:

> The Compensatory Mitigation Plan describes a plan to locate the compensatory wetland mitigation sites within the same subbasins as the associated wetland impact sites. The temporal lag between effects on stream functional units and their mitigation would be addressed via off-site stream improvements located in subbasins outside the Stibnite Gold Project vicinity (Tetra Tech 2023). The proposed compensatory wetland mitigation within the Stibnite Gold Project area subbasin would be located around the mine site area where the majority of wetland impacts would occur, with no mitigation sites proposed along the access roads and the transmission line routes. The current location and configuration of mitigation sites identified in the Compensatory Mitigation Plan were selected based on suitable hydrology and compatibility with watershed-scale features and on the likelihood that compensatory mitigation wetlands would be sustainable within five years (Tetra Tech 2023). *If it is determined during Compensatory Mitigation Plan implementation that the original performance standards for the design may not be attainable, new performance standards may be developed based on the site evaluations but must still meet the minimum standards for compensatory mitigation.* At the conclusion of the Forest Service NEPA process, final wetland impacts would be assessed, any agreed upon off-site compensatory mitigation projects would be finalized, and a final mitigation plan would be prepared, including a final assessment of functional units lost and created, and then the final credits and debits would be documented in the Clean Water Act Section 404 permit based on U.S. Army Corps of Engineers impact determinations.

Significance: The added text explicitly reflects the intent that compensatory mitigation performed meets the minimum standards in the event that new performance standards are developed during implementation.

7. FEIS, Chapter 4, Section 4.24.3 Tribal Rights and Interests Mitigation Measures (page 4-728 to 4-729).

The mitigation measure is modified by adding the italicized text:

> **Mitigation Measure – Tribal access plan:** Perpetua and the Federally-recognized Tribes with traditional use claims for the Operations Area Boundary would utilize a Tribal Access Plan to allow for continued access for tribal members *and for their traditional activities* while complying with safety rules and requirements put in place to protect the health and safety of workers and visitors to the Operations Area Boundary. The Tribal Access Plan locations would be designated for tribal member entry into the Operations Area Boundary, parking areas, accessible trails and roads. Pre-notification and communication procedures while tribal members are actively within the Operations Area Boundary would be developed.

Significance: The added text explicitly reflects the intent that pursuits of traditional activities are included in the Tribal Access Plan.

Article V. FEIS, Chapter 7, References

The following references are added to the reference section of the EIS (Section 7.1):

> Bouazza, A. 2002. Geosynthetic clay liners. *Geotextiles and Geomembranes*: 20:3-17.
>
> Geosynthetic Institute. 2013. Standard Guide for Design Considerations for Geosynthetic Clay Liners (GCLs) in Various Applications.
>
> Rowe, R. 2020. Geosynthetic Clay liners: Perceptions and misconceptions. *Geotextiles and Geomembranes*: 48:137-156.

Significance: The added references are from text added to the FEIS from this errata.

Article VI. FEIS, Appendix B, Response to Public Comments on the SDEIS and Response to Public Concerns on the 2020 DEIS

1. FEIS, Appendix B, Laws and Regulations (page B-6).

The response is modified per the italicized text:

> Forest Service intends to oversee the use of proposed borrow pits intended for construction of the Burntlog Route *under 36 CFR Subpart 228A. Preliminary details of the borrow pits were provided to the Forest Service in Perpetua's 2021 Modified Mine Plan, with final details provided with the finalized road design.* The overall disturbance area and environmental effects of these borrow sites is included in the SDEIS.

Significance: The modification corrects the description of Forest Service oversight of the borrow pits.

2. FEIS, Appendix B, Special Designations (page B-618)

The response is modified per the italicized text:

> *The Idaho Roadless Commission, which was established by Idaho Executive Order No. 2006-43 (12/21/2006), in partnership with the U.S. Forest Service ensues the implementation of the Idaho Roadless Rule. The Idaho Roadless Commission was briefed routinely throughout the preparation of the environment analysis. Those briefings, including use of 36 CFR 294.25 (b) for the project.* Impacts to other resources were disclosed in their respective SDEIS sections, regardless of IRA boundaries. Since the SDEIS, a mitigation measure to restrict public access on the new segments of the Burntlog Route has been added to the Final EIS.

Significance: The modification clarifies that the Idaho Roadless Commission does not approve projects but reviews their compliance with applicable Roadless rule/laws.

Article VII. Stibnite Gold Project Wetlands and Riparian Resources Specialist Report

1. Wetland and Riparian Resources Specialist Report, Section 7.2.1.1 Issue: Construction and Operation of Mine Infrastructure would Remove Wetlands and Riparian Resources, Impact Ecological Function, and Fragment Wetland Habitat (page 73)

The report text is modified per the italicized text:

> Hydrologic flows through riparian areas and wetlands would be affected by *road crossings, culverts, and the TSF* that would alter the current route of surface and subsurface flows and could reduce the delivery of woody material from riparian areas into streams.

Significance: The modification clarifies the mine infrastructure that will affect surface and subsurface flows.