

December 21, 2022

**Public Comment to the Forest re Service’s Supplemental Draft Environmental Impact Statement (SDEIS). Submitted by Edith R. Welty, MD**

**To: Linda Jackson, Payette Forest Supervisor  
Stibnite Gold Project  
500 N. Mission Street, Building 2, McCall, Idaho 83638**

My husband and I have lived in McCall for the past 16 years and have camped and hiked around Johnson Creek and the East Fork of the South Fork of the Salmon. We have also toured the mine site. Our kids and grandsons love the South Fork for paddling and recreating. Although I appreciate the Forest Service’s significant efforts to choose the safest mining alternative and to improve the DEIS through the Supplemental documents, as a family physician with many years of experience in public health, I still have grave concerns that, even with the modifications made in the Supplemental DEIS, there is still great risk of ongoing contamination of the South Fork of the Salmon from mining operations in head waters of the East Fork, which is a sensitive ecologic area. The MMP 2021 states in the SDEIS:

“Timeline:

- Construction: Approximately 3 years.
- Operations: Approximately 15 years.
- Exploration: Approximately 17 years (during construction and operations).
- Reclamation: Approximately 5 years (except for the TSF which would require an additional 9 years for tailings dewatering and consolidation).
- Closure/Post-Closure Water Treatment: Approximately through Mine Year 40.
- Environmental Monitoring: As long as needed.” P. 2-4. This will be important in the ensuing discussion.

I have focused on the **risks to human health** of selected topics in the SDEIS and have placed in quotes or given SDEIS page numbers on each topic, followed by comments on those sections. I have underlined some sections of greatest concern in my comments and/or questions at the end of each focus area. I request that the Forest Service (FS) respond in writing to each comment or question.

**Human Health Focus Areas in This Document:**

- I. Water quality,
- II. TSF and TSF Buttress,
- III. HazMat transport and traffic volume,
- IV. Further exploration by Perpetua on FS land

**I. WATER QUALITY**

**A. MMP 2021 Water Chemistry Tables**

Tables 4.9-12 through 15 and 18 through 20 show predicted concentrations of various metals and other chemicals in West End, Midnight, Hangar Flats, and Yellow Pine Pits and Pit Lakes extrapolated out to 100 or 112 mine years, with most predicted to have no remaining toxins after

mine year 40, based on several modeling programs. The predominant toxins currently are arsenic, antimony, and, to a lesser degree, mercury.

**COMMENT:**

Theoretically, at year 40, the prediction is for no further water coming from these pits, and therefore no further need for water treatment. However, the validity of models has a significant uncertainty factor, in that they are based on many potentially faulty assumptions, such as the ability to predict the effects of earthquakes, avalanches, excessive snow melt in the setting of climate change, and other phenomena. Also, since mining operations will generate increased water levels of these and other heavy metals, sulfates, etc., over the course of 12-15 years, downstream surface waters such as the EFSFSR and S. Fork are likely to become more contaminated than at baseline, and then to deposit more toxins in their streambeds that will continue to re-pollute flowing water and groundwater for many more years than predicted. There are minimal to no measurements or predictions in the EFSFSR or S. Fork, which are the streams of primary concern for human health.

**Question: Who will monitor and clean up the EFSFSR and S. Fork after Perpetua leaves at year 40? Recommendation: Perpetua should be required to do this both now and in perpetuity and they should post bonds to cover the cost.**

**B. Pit Backfills and Lake**

Although the Yellow Pine Pit Lake is to be de-watered, and the bottom sediments to be removed and re-processed, the planned expansion of this pit will generate more As, Sb, etc. before the pit is backfilled post-closure. Tables 4.9-12-15 show predicted levels of As and Sb still elevated in porewater in the Midnight, YP, and Hangar Flats pits at year 100, and in surface water in West End pit at year 100. Additionally, Pb and Mn will still be elevated in the Midnight Pit at year 100. The pit backfill development rock contains additional heavy metals and other solutes that would have remained in the rock, if the pits were not being further mined. It is likely that further mining will again generate toxic sediments at pit bottom that will leak out through seeps and into both surface and groundwater, in spite of efforts to keep the backfilled pits dry.

Since the caps over the YP, Midnight, and Hangar Flats pits are only millimeters-thick, they are very likely to be perforated by sharp development rocks over which they are to be placed, and thus are very likely to develop leaks far in excess of the model-predicted leak sizes. The EFSFSR streambed is to be re-established over the YP revegetated cap. The leak-prediction model in table 4.9-7, p. 4-211 is based on unproven assumptions that fail to account for multiple potential causes of perforation. Although liner leak data in this table are calculated for the TSF, the same principle of expected leakage applies to the YP, Midnight, & Hangar Flats pits. In addition, when these pits are re-vegetated, soil and rocks will be dumped over the caps, probably causing perforations, and tree roots will eventually grow down through them. Both of these will cause more cap leaks of As, Sb, and other solutes from the development rock into the groundwater and surface water, especially during heavy rainfall or snowmelt, and definitely, if the caps are damaged by avalanches, landslides, or wildfires.

The assumption that all these backfilled pits will be dry by mine year 40 is very likely to be false, given all the above potential causes of ongoing meteoric and surface water leaks into the pits.

### **C Fish Bioaccumulation of Toxins**

The process of **fish bioaccumulation** during the 12-15 years of mining will cause elevated levels of toxins in fish to persist for many years. A 2009 study (Ecotoxicology and Environmental Safety. Volume 72, Issue 5, July 2009, Pages 1440-1445) of arsenic accumulation in an edible fish, the brown trout (*Salmo trutta*) was conducted downstream from a mine on the Bravona River, France. The investigators measured arsenic levels in fish at four stations along a contamination gradient. **Almost 70 years after the suspension of the mining activity, arsenic levels in the water and in the fish remained high, with a strong correlation between levels in water and levels in fish.** Thus, for many years post-closure, eating fish downstream from the Stibnite Mine will continue to be a risk to the health of humans and to animals that eat fish. Humans who paddle the S. Fork or drink water from the S. Fork or from the EFSFSR and its tributaries will be at increased risk of heavy metal toxicity. This includes Nez Perce tribal members and many others who buy fish from them.

### **COMMENTS:**

Perpetua should be required to monitor downstream and upstream fish for toxins and to clean up the SGP and surrounding streams, including the EFSFSR and S. Fork, in perpetuity, or until fish no longer contain toxins for at least 100 years.

### **C. Water Treatment Plant**

According to the 2021 MMP (Perpetua 2021a) three water types would require management over the life of the Project: contact water from mine facilities, which includes dewatering water (construction through closure); consolidation water from the TSF (construction through closure which includes process water) and sanitary wastewater (construction through early closure).

Table 4.9-1 shows elevated concentrations of As, Hg, Pb, Sb, and several other toxic chemicals above water quality criteria in contact water from Hangar Flats, SODA, Plant, West End, and Midnight ponds in influent water into the WTP (P. 189) Table 4.9-9 shows markedly elevated levels of these and multiple other heavy metals in WTP inflow prior to placement of caps, with the objective to bring down these levels to water quality criteria after cap placement. Table 4.9-10 shows target levels for heavy metals, sulfate, and other toxins in WTP effluent. However, although it is good to work toward target levels of toxic chemicals after water treatment, the efficacy of the WTP is as yet unproven. Perpetua plans to stop participating in water treatment at 20-25 years after mine closure (mine year 40), as if there will be no risk of any toxic chemicals getting into WTP influent that occurs immediately and magically at year 40, when installation of cover materials is expected to be complete. Presumably, if the effectiveness of the cover materials is not as perfect as predicted, Perpetua will no longer be responsible, and taxpayer dollars will have to pay for any further adjustments and management of the WTP. (see discussion of efficacy of liners and cover materials below under TSF). When we discussed this concern with Perpetua representatives at the meeting in Best Western motel on 12/7/22, they told us that Perpetua would actually not desert management of the WTP at 40 years, if there were still problems with toxic chemicals in WTP inflow, but they did not show us any written commitment to continue assisting with water quality monitoring and treatment after mine year 40. Considering other examples of mining companies that leave ongoing water treatment to the State (eg. the Summitville mine in Colorado), it would seem prudent to get a written commitment and funds from Perpetua before they begin mining to continue monitoring and treatment “in perpetuity,” as they first promised in the 2020 DEIS.

Per the initial DEIS I reviewed in 2020, the **“in-perpetuity” treatment would result in approximately 20 truck trips annually to deliver water treatment chemicals and an unknown number of trips to haul sludges and wastes** from the treatment plant off-site for disposal.

**The following issues and monitoring measures are critical, in order to protect surface and groundwater from ongoing pollution with toxins long after the 40-year limit proposed by Perpetua has been completed (see SDEIS p. 4-283):**

“**Issue:** Despite the best efforts at calibration and validation predictive modeling of groundwater and surface water chemistry and temperature entails uncertainty and future field conditions may vary from model predictions.” “**Issue:** As with any predictive model, limitations to long-term water chemistry modeling may result in underestimation of the nature and/or extent of surface water and groundwater quality impacts.”

“**Monitoring Measure - Water Resource Monitoring Plan Implementation:** Because construction, operation, and closure of the proposed Project has potential to impact surface or groundwater resources, a focused Water Resources Monitoring Plan for the approved project would be developed by Perpetua. As the mine owner/operator, 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. 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 for a period in the post-reclamation period. 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.”

“**Formation of the West End pit lake would also permanently lower groundwater levels in its vicinity. Irretrievable impacts would occur when concentration changes in the mine site groundwater are predicted to persist throughout the entire 100-year post closure period. This type of long-term concentration change would be considered an irretrievable impact because it may limit the productivity of groundwater for designated uses.**” P. 285

**Comments:**

The adopted methodology included development of conceptual models for operational and post-closure phases of the SGP, and numerical geochemical modeling. The numerical modeling was completed for: (1) Yellow Pine pit and backfill, (2) Hangar Flats pit and backfill, (3) West End pit lake, (4) Midnight pit and backfill, and (5) the TSF, TSF Buttress, and TSF Embankment. These models assumed leakage rates for proposed liners to account for small volumes of infiltration through tailings and development rock and their effects on water chemistry. However, the models have a great deal of uncertainty. Perpetua must be held accountable for unpredictable escape of contaminants.

The surface water assessment nodes were established at or near surface water sampling locations monitored during the Surface Water Quality Baseline Study (HDR 2017f). The main sources contributing to flow and constituent loading at each of the assessment nodes were

identified from the baseline study, the Water Resources Summary Report (Brown and Caldwell 2017a), and from an inventory of legacy mining features provided by Perpetua (SRK 2018b). These sources include upgradient stream flow, flow from seeps and addits in the watershed, loading from legacy mine features, plus any potential sources of groundwater inflow identified from the gain-loss analysis conducted as part of the Water Resources Summary Report (Brown and Caldwell 2017a).

Predictive water quality modeling utilizes the USGS's PHREEQC software (Parkhurst and Appelo 1999) to forecast water chemistry associated with

- infiltration and seepage from the TSF Buttress,
- the influence of the TSF on groundwater chemistry, Stibnite Gold Project Supplemental Draft Environmental Impact Statement 4-184
- inundated backfill in the Yellow Pine pit, Hangar Flats pit, and Midnight pit,
- the West End pit lake, and
- water treatment influent and effluent.

**Comment and Recommendation:**

**Perpetua must be required to live up to the above monitoring measures and commit funds to continue operating the Water Treatment Plant long after the 40-year limit they have proposed, to assure water quality in the S. Fork and EFSFSR and its tributaries in perpetuity, or for at least 120 years. Even if mining remains their right, according to the 1872 mining law, they must be required to live up to their new name, "Perpetua," by fulfilling this obligation.**

## II. TSF AND TSF BUTTRESS AND EMBANKMENTS

From 1992 -2009 there were partial cleanups by various groups (Mobil Oil, EPA, IDL, FS). The last cleanups in 2005-2007 by FS were backfilling & reclaiming parts of Meadow Creek. **This reclamation of Meadow Creek would be destroyed by SGP when they use Meadow Creek for TSF!!** In 2009, FS removed tailings at Smelter Flats site and re-graded roads, but placed waste in an unlined pit onsite. Perpetua should be required to remove on-site wastes placed there by the FS in 2009, and also required to monitor and clean up any contamination of Meadow Creek after they re-route the creek around the outside of the TSF.

**"At final buildout, the TSF Buttress and adjacent TSF Embankment would contain 142 million tons of material, comprising 85.5 million tons (60%) of non-PAG development rock from the Yellow Pine pit, 22 million tons (16%) of non-PAG development rock from the West End pit, 14.3 million tons (10%) of non-PAG development rock from the Hangar Flats pit, 6.4 million tons (4%) of PAG development rock, 11.7 million tons (8%) of borrow material, 1.25 million tons (0.9%) of spent ore from the Hecla Heap, 0.85 million tons (0.6%) of spent ore from the SODA, and 0.2 million tons (0.1%) mine waste placed on the former SMI on/off leach pads during the ASAOC action." P. 190-191** **This is a huge amount of toxin-containing rock to be placed on the liner described below, and there is much uncertainty about potential leakage. If the buttress is penetrated by meteoric or surface water that seeps in through the cap, the toxic metals and other solutes are likely to find their way through the buttress and contaminate downstream waters.**

### ***“TSF Liner System***

Due to water quality regulations and the presence of dissolved metals (chiefly arsenic and antimony, with trace mercury) and residual cyanide in the tailings pore water and supernatant pool, the TSF impoundment (including the upstream embankment face) would be composite-lined with geosynthetic materials to prevent seepage of processed water or transport of tailings out of the facility. A network of geosynthetic drains would be placed above portions of the geomembrane liner to reduce hydraulic head on the liner and excess pore pressure in the overlying tailings. The drains would report to a sump near the upstream embankment toe, and the water would be pumped out to the pool or reclaim system for reuse (M3 2021).

“A composite liner consisting of a 60-mil, single-sided, textured, linear low-density polyethylene liner over a geosynthetic clay liner (GCL) would be employed to contain the tailings. Before placement of the liner within the TSF, the subgrade would be re-worked and compacted, or a minimum of 12 inches of buffer/liner bedding fill would be placed. Geosynthetic over liner drains would be placed above portions of the liner to reduce hydraulic head on the liner and pore pressure in the overlying tailings solids during operations. The drains would direct water that migrates through the tailings to a sump near the upstream toe of the embankment, and the water would then be pumped out to the tailings pool within the impoundment or the reclaim system for reuse in the mill.

Facilities that use cyanide in their mineral extraction process are required to obtain a permit from the Idaho Department of Environmental Quality (IDEQ) and follow the Rules for Ore Processing by Cyanidation (IDAPA 50.01.13). The IDEQ entered into rulemaking on the existing regulations to change the regulatory requirements from prescriptive requirements to performance-based requirements. A temporary Rule went into effect in October 2020, and the final rule was approved by the legislature in 2021. The liner system proposed for the SGP meets the requirements of the rule under which the Project’s Cyanidation permit is expected to be issued. P. 2-56”

Table 4.9-3 predicts toe/pop-out seepage of elevated levels of toxins above IDEQ standards to be nil after mine year 40, and table 4.9-6 predicts no abnormal levels of any measured parameters of TSF surface water after mine year 40. These assume no liner or cap leaks. Table 4.9-4 predicts contamination of groundwater under TSF Buttress and Embankment with levels of As and Sb above IDEQ standard from mine year 19-112, which assumes that the liner and under-liner drains have leaks and that any cap does not prevent infiltration into groundwater. Table 4.9-8 predicts groundwater chemistry under the TSF to be negative for elevated levels of any measured adverse parameters from mine year 13-112, which assumes WTP efficacy until mine year 40 and then cover efficacy during mine years 41-112. There is no guarantee that As, Sb, and other toxic solute levels in downstream waters would be negative after mine year 40, given the risk of faulty modeling assumptions and of cap and liner leaks.

Table 4.9-2 predicts NO elevated levels of toxins above IDEQ standards in runoff from the Buttress and Embankment after mine year 18, when the covers are to be installed, through year 112. A similar system of liners, drains and covers was placed under and around Love Canal in the mid-1980s, which became infamous for contaminating a housing development, resulting in huge expenditures of taxpayer money to clean it up and pay for people in the housing development to move elsewhere. Are there data documenting how effective these liners, drains, and covers are after many years, or will faulty modeling assumptions result in unpredicted contamination?

## COMMENTS:

**Table 4.9-7 calculates yearly liner leakage steadily increasing with each year of additional tailings, before cover placement. If liner and/or cap perforations occur, all of these waters are likely to become contaminated with high levels of, at least, As and Sb. The Meadow Creek Valley has many faults through which liner leaks will drain into groundwater. The statement in the SDEIS that groundwater will be recharged at 500 times the rate of leaks appears to assume the outdated idea that “the solution to pollution is dilution.” Haven’t we learned anything in the last 100 years?**

“CERCLA provides that the potentially responsible parties for releases of hazardous substances pay the costs to investigate and remediate contaminated sites.” P. 1-5. According to this law, it would be theoretically legal to require Perpetua to pay for hauling all tailings and other mine wastes they produce during operations to a HazMat storage area elsewhere, rather than dumping them at the headwaters of one of the most beautiful Wild and Scenic rivers in America. However, since hauling millions of tons of contaminated rock over roads would increase hazards to people traveling those routes, and potential spills to streams and rivers along the route would have a significant negative impact on the environment, it is prudent to determine the alternative that would be best for the environment and the people of Idaho. The SGP timeline states that the Perpetua agreement includes: “Environmental Monitoring: As long as needed.” P. 2-4

## QUESTIONS:

1. **How will the above plans to line the TSF Buttress and Embankment with only a 0.06-inch polyethylene liner over a thin layer of clay over a foot of compacted earth prevent leakage through liner perforations, when 142 million tons of highly-contaminated sharp rocks (table 4.9-2) will be dumped on top of it to form the buttress and embankment?**
2. **How will the under- and over-liner pumps and drain systems not be damaged by dumping these rocks on them?**
3. **How will the cover over the top of the TSF, Buttress, and Embankment not develop leaks when soil (which is in short supply in that area) is dumped on them and the area is re-vegetated? Is there even enough soil to re-vegetate?**
4. **How long will the over-cover prevent surface water from draining through perforations, especially when trees grow and develop roots that will penetrate into the contaminated rock and TSF underneath?**

### **III. Haz Mat Transport and Traffic Volume**

“Current access roads used for the transport of hazardous materials to the mine site include Warm Lake Road (CR 10-579) from Cascade, continuing to Landmark and then on Johnson Creek Road (CR 10-413) to the village of Yellow Pine and Stibnite Road (CR 50-412) to the mine site.” P. 3-99 “The largest volume of hazardous materials currently used at the mine site is petroleum hydrocarbons (e.g., diesel, unleaded gasoline, and Jet A fuel). “The estimated annual average traffic to the SGLF and from the SGLF to the SGP during mining and ore processing operations is also provided in **Table 2.4-2**. Supplies and deliveries for the SGP during operations would access the SGLF using SH 55 to Warm Lake Road. Approximately two-thirds of all mine-related traffic would originate south of Warm Lake Road and would use SH 55 through Cascade and other communities along SH 55 south of Cascade including Smith’s Ferry, Banks and Horseshoe Bend.

Approximately one-third of all mine-related traffic originating north of Warm Lake Road would use SH 55 through the communities of Donnelly, Lake Fork, McCall, and New Meadows. Through McCall, mine-related traffic would generally use Deinhard Lane and Boydston Street. Employees would be encouraged to use company provided shuttle buses as transport to the SGLF from towns along SH 55.” P. 2-22 (see table 2.4-2 for numbers of vehicles).

“In the event a release was to occur, it would likely be relatively small in volume based on estimated container volumes and would be addressed promptly as per the SPCC Plan and Spill Response Plan. The SPCC Plan would address site-specific spill prevention measures, fuel haul guidelines, fuel unloading procedures, inspections, secondary containment of all on-site fuel storage tanks, and staff training.” “In the event that large quantities of hazardous materials are spilled into the environment from a transportation incident, or in the event that a spill is not immediately discovered or addressed, the impact could be more substantial.” P. 4-522

### **COMMENTS:**

The sections of this SDEIS on vehicle traffic, including HazMat transport, cover primarily the roads from Cascade and McCall to the SGP, not Hwy 55 or other roads along the way. The SDEIS indicates that the FS prefers the Burnt Log route, because it has fewer stream crossings and possibly fewer steep grades than the Johnson Creek route. However, these smaller roads are less important to the citizens of Idaho than Hwy 55 and other main roads. At the public meeting held by Perpetua and the FS on 12/6/22 at the Best Western motel in McCall, I asked 2 different Perpetua employees what Perpetua’s responsibility would be for HazMat spills along Hwy 55 between Boise and McCall and between New Meadows and McCall. One said that such accidents would be the responsibility of the trucking company they contract with, and the other said Perpetua would aid in the response. One said Perpetua would use only Deinhard Lane through McCall, and the other said they might sometimes come through downtown. Thus, it appears that Perpetua has no concrete policy on this, which suggests that they would deny any responsibility for spills.

**Given the risks and inconveniences of having “convoys of trucks” and oversize vehicles traveling on Hwy 55 from either the south (eg. Boise) or the north (eg. Council, New Meadows), it is critical for Perpetua to be held responsible for all traffic accidents or HazMat spills that involve their vehicles or their trucking contractors’ vehicles going to and from the mine.**

For example, if a spill of, say, cyanide, dumps into the North Fork of the Payette or into the Little Salmon River on Hwy 55, it will contaminate those rivers for years to come. If a spill occurs on the streets of Boise, Cascade, Donnelly, or New Meadows, the risk of direct contamination to people who encounter the toxins would be significant. If people traveling between McCall and Boise or McCall and New Meadows have to wait for Perpetua truck convoys or oversize vehicles, it will be not only an inconvenience, but also a significant risk for traffic accidents. Hwy 55 along the North Fork has many rock slides and too many traffic accidents already. This highway is heavily used, since it is the major route to get into or out of McCall. Perpetua must be held responsible for such chemical spills and accidents.

### **QUESTION:**

**How will the FS assure enforcement of a requirement for Perpetua to be held responsible to pay for all costs of injury, vehicle damage, and HazMat spills attributable to mine-related**



**vehicles along ALL routes their vehicles travel in Idaho, including Hwy 55 through Boise and New Meadows?**

#### **IV. FURTHER EXPLORATION ON FS LAND**

##### **“2.4.6 Surface and Underground Exploration**

Surface and underground exploration including development drilling would occur to evaluate potential mineralized areas outside of the proposed mining areas. New surface and underground exploration activities would be conducted during construction and operations. Any additional future expansion of mining activities would require supplemental permitting and approvals, including additional evaluation under NEPA.” P. 2-80

##### **3.7.4.1 Operations Area Boundary**

“Current exploration-related activity is occurring in the three major identified deposits at the mine site: Yellow Pine, West End, and Hangar Flats (**Figure 2.4-2**) as well as those areas as defined in the Golden Meadows Exploration Project Plan of Operations (Midas Gold 2011, 2016b). Perpetua currently stores and uses various substances classified as hazardous materials for ongoing exploration activities.” P. 3-95

“Exploration-related fuel transportation to the site by Perpetua has been occurring since 2011 and, through 2021, has consisted of deliveries by 288 fuel tankers, each with a capacity between 4,000 and 4,500 gallons.” P. 3-99

##### **“4.9.2.1 No Action Alternative**

Under the No Action Alternative, the Forest Service would not approve the SGP, and therefore no activities proposed on Forest Service lands would be approved as part of the EIS.

This alternative would not include any surface (open-pit) mining or ore processing to extract gold, silver, and antimony, and no underground exploration or related operations included in the proposed 2021 MMP on Forest Service lands would occur. Perpetua would continue to implement surface exploration and associated activities that have been previously approved on Forest Service lands as part of the Golden Meadows Exploration Project, per the Golden Meadows Exploration Project Plan of Operations and the Golden Meadows Exploration Project EA (Forest Service 2015c). These approved activities include construction of several temporary roads (approximately 0.32 mile of temporary roads) to access drill sites” p. 184

#### **COMMENTS:**

If the FS approves Perpetua’s application to expand exploration on FS land under the MMP2021 proposal, Perpetua will continue to apply for permits to expand exploration for these metals on FS land for many more years. They already have many drill sites on FS land. **These plans show that Perpetua wants to keep expanding mining into more FS land after they finish this current onslaught. Granting Perpetua any more permits to explore for minerals on FS land is a slippery slope! The FS should limit any further exploration to what was already permitted in the 2011 Golden Meadows Project.**

**In addition to damaging the PNF by drilling, the above quotes show clearly that the risk of spills of highly flammable petroleum products is a major threat for spills that contaminate streams and risk starting wildfires. The FS should not permit any further exploration and should completely stop HazMat transport onto FS land.**