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First name: Don
Last name: Vernon
Organization:
Title:
Comments: WATER QUALITY COMMENT
Both action alternatives involve the removal and disturbance of mineralized materials which have the potential to release heavy metals and ions that would deteriorate surface water resources and groundwater chemistry. Sedimentation from mining activities and construction will be a detriment to water quality. Groundwater will suffer from an increase in analyte concentrations from the leaching of development rock. However, the argument for allowing this degradation in water quality is that "existing groundwater in those areas typically does not meet regulatory criteria for use as drinking water due primarily to arsenic and antimony concentrations," (p. ES-15). First comment existing degraded water quality should not be used as a rationale for activities that further pollute groundwater in the area. Second comment is the USFS should establish with input from Federal and State Water Quality regulatory experts a water quality protection plan based upon points of compliance with applicable Water Quality Standards. As noted in the start of this comment, mining activities will release contaminates. With establishment of points of compliance and using Perpetua's proposed a water treatment system, all water at the points of compliance that does not meet applicable Water Quality Standards would be collected and conveyed to the water treatment system prior to discharge. Thus, applicable water quality standards would be achieved downgradient of compliance points.