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Comments: This area has a long history of mining and recently actions have been taken to reduce the negative affects of mining. Mining activities permitted from the 1970 though the early 1990s were permitted with the idea that mining activities could help solve some of the historic problems. This is the same argument being made by the current proponent Perpetua Resources. Unfortunately Superior Oil and Pioneer Metals did not fulfill the conditions under which their Plan of Operation was approved and the US Government had to step in and address the highest priority environmental threats.

Mining companies not fulfilling their obligations is not a unique situation. A study by the The Idaho Conservation League of open pit mining operations in Idaho looked at 13 open pit mines (12 of which were for gold) permitted in Idaho since 1970. The primary conclusion was that no permitted mine completed its plan of operation as described in the NEPA permitting process (I believe Stibnite is one of these mines). Bankruptcy, environmental damage, and commodity price fluctuations were the primary contributors.

Given the track record of mining in the Stibnite area and across Idaho the Forest Service should approach the approval of the Plan of Operation with a large amount of skepticism. Promises will be made and plans developed but the chance of the Plan of Operation being completed as approved are highly unlikely.

To assure the proposed reclamation activities occur and the Plan of Operation is followed I believe a realistic and accurately calculated reclamation bond must be required. The bond amount should be adequate (remove elements added to the water by post 2022 mining) to treat any waters affected by the mine for perpetuity as well as restoring the landscape to its 2022 condition.

With the amount of money US citizens have spent cleaning up Stibnite it is only fair that the citizens be protected from having to pay for future clean up efforts.
Thank you for considering my comments.

Sincerely

Stephen Ryberg