Data Submitted (UTC 11): 10/21/2024 6:39:28 AM
First name: Edith
Last name: Welty
Organization:
Title:
Comments: ***WATER QUALITY!!!:
In the river systems, the levels of arsenic, mercury, antimony, cyanide will be elevated. This will affect water quality, as well as fish and wildlife populations.
Tables 4.9-12-15 in the SDEIS showed predicted levels of arsenic and antimony 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, lead and manganese will still be elevated in the Midnight Pit at year 100. However, in the FEIS, Perpetua is required to monitor and treat water to meet water quality standards for only 25 years post-mine closure. There is no plan for continuing to operate the SGP Water Treatment Plant after the 25-years and no proof that the pits will remain dry, if caps and liners are damaged by natural disasters. Thus, the SGP will be in violation of the CWA section 404.
A study of fish levels of arsenic downstream from a mine in France showed that fish still contained arsenic at 70 years post-mine closure. It is likely that fish in the EFSFSR and the S.Fork of the Salmon will continue to have high levels of heavy metals far beyond Perpetua's 25 years of responsibility post-closure.

***ORIGINAL OBJECTION:
10-18-24 Objection to the Forest Service Response to My Public Comment 12-21-22 as stated in Appendix B, pg.B-745,#11600 under "General Comments." "No further response required."
This response is inadequate. The FS illegally failed to fully respond to my detailed comments under NEPA and must perform a hard look analysis of Perpetua's plan for maintaining compliance with water quality standards prevention of ongoing water pollution downstream from the Stibnite Gold Project (SGP) site and failed to provide an adequate plan for hazardous materials transport on Hwy 55, Warm Lake Road, and further roads to the SGP.

RECOMMENDATIONS!!!:

(1) Perpetua should be required to pay for monitoring water quality and treating surface and ground water toxin exceedances of water quality standards in the EFSFSR and the S. Fork of the Salmon in perpetuity post-closure. This includes ongoing support of the Water Treatment Plant and measuring influent and effluent heavy metal and sulfate concentrations. They should post bonds to cover the costs.

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

(3) Perpetua should be required to assure that Tailings Storage Facility geosynthetic caps and liner drainage systems do not allow water concentrations of toxins, if leakage exceeds quantities calculated in the modeling calculations (eg. in cases of earthquake, overflow, avalanches, and other natural disasters).

(4) Perpetua should not receive a 404 permit until they fully comply with the CWA Section 404.