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Organization:

Title:

Comments: 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.

Hazardous Materials (HazMats)

Perpetua has agreed to train fire department personnel in several towns along Hwy 55, including Riggins, Council, New Meadows, McCall, and Cascade how to manage HazMat spills, but has not agreed to pay for spill equipment, salaries, and other expenses for the duration of the Project. These fire departments are already inadequately funded and often short-staffed. Spill management would further stress these fire departments and reduce their ability to respond to other emergencies. What is the backup cleanup plan in challenging circumstances?

Spills along the North Fork of the Payette River and the Little Salmon River, and through these towns will potentially contaminate the Main Salmon, Big Payette Lake, Lake Cascade, and the Payette River. Payette Lake is the sole source of drinking water for McCall. Also, Perpetua's wide loads and hazardous chemical trucks will obstruct traffic on Hwy 55 and other roads leading to Stibnite, thus increasing risk of citizen auto wrecks and will seriously inconvenience non-mine-related traffic.

Recommendations:

(1) Perpetua should be required to pay for cleanup of HazMat spills on rivers, roadways, and towns along the entire route from Boise or Council to the mine site, for as long as the mining chemicals and their residual effects are detectable (environmentally and in wildlife)

(2) Perpetua should provide a publicly published document detailing the plan for initial and ongoing longterm costs of the training/staffing/paying/insuring/equipping of the fire departments for them to be prepared for Perpetua's potential spills, and how that is being funded.

They should provide a detailed breakdown of how much of that cost is supposed to be taxpayer funded, versus privately Perpetua funded.

(3) Perpetua's costs should include funding the associated fire departments for ongoing fire department HazMat training, staffing, equipment, salaries, health insurance, and retirement for additional fire department staff.

(4) Perpetua should provide to the public in detail what their plan provides for if there are multiple active fires/emergencies, where fire crews are already stretched to the max dealing with emergencies/natural disasters (what they were hired and are paid by taxpayer dollars to do), and a spill happens at the same time. Where would the fire department's priorities be focused?

(5) Perpetua should provide a manual for their drivers, focused on protocols and rules for drivers' safe practices (both on the road and during a spill situation), and timing management solutions for their traffic control stops along their trucking routes. Perpetua should be held responsible for all traffic accidents that involve their vehicles or their truckers/contractors' vehicles not following road safety protocols/precautions along all roads going to and from the mine.

