



Dear Members and Supporters,

The Kootenai National Forest recently released a Draft Supplemental EIS (DSEIS) for public review with a 45-day **comment period ending April 4, 2016**. The Rock Creek Alliance requested an extension of this short comment period to give us and our experts enough time to review the EIS and supporting documents, and report back to you about the changes and deficiencies in the mine plan. The Kootenai National Forest Supervisor denied our request, stating that the DSEIS is not a lengthy document. We think 990 pages is a lot to expect the public to read, and note that the Forest Service and mining company consultants had six years to work on the DSEIS.

We also requested an open house in Sandpoint to provide community residents with information on the latest mine plan. Although, the Kootenai National Forest held open houses in Thompson Falls, Libby, and Noxon, our request was denied. Since meetings have been held in Sandpoint in the past, we are baffled by this denial. To assist our local members and the public, we will be conducting our own information tabling where you can learn more and pick up information fliers.

Rock Creek Alliance Informational Tabling:

Monday 3/28 @ Evans Brothers Coffee from 8am - 10am

Tuesday 3/29 @ East Bonner County Library from 11am - 2pm

It's disappointing, but not unexpected that the Draft Supplemental EIS dismisses impacts to Idaho's waters claiming, "No impacts to Idaho waters are expected." Given that the mine plan still calls for a *perpetual discharge* of pollutants to the Clark Fork River, this is clearly untrue. Unfortunately, this proposal hasn't gotten any better, and still poses substantial risks and known impacts to water quality, wilderness, wildlife, and local economies.

You can help by sending a letter to the Forest Service by April 4, 2016. Your letter does not have to be long, but should include substantive issues. Below are some points you can raise. We have additional talking points and a sample letter on our website: <http://www.rockcreekalliance.org/>



Cliff Lake In the Cabinet Mountains Wilderness is at Risk of Being Drained
Photo by Woods Wheatcroft

Talking Points:

1. By dismissing impacts to Idaho's waters, the DSEIS does not take into account the cumulative, long-term impacts to Lake Pend Oreille from the mine's perpetual pollution.
2. The DSEIS fails to quantify the amount of wastewater that will escape treatment before being discharged to the Clark Fork River. This will happen if the amount of water encountered during mining is greater than anticipated, during storm events due to runoff from undersized holding ponds, and from other sources of contaminated water.
3. The mine plan is relying on outdated technology. Nearly all modern underground mines backfill tailings into the underground mine, but this is not being done due to the cost to the mining company.
4. The design of the tailings impoundment is no longer considered safe due to recent catastrophic failures in Brazil and British Columbia. A "downstream construction design" would be far safer than the proposed "upstream construction design."
5. The seismic safety calculations for the tailings dam are inadequate. Montana requires the use of a 10,000-year earthquake event for safety calculations, but the SDEIS uses a 2,500-year earthquake event.
6. The tailings dam should be moved away from its currently proposed location, which puts it right next to the Clark Fork River and Rock Creek.
7. The DSEIS claims a clay layer beneath the tailings area will adsorb metals in tailings seepage water, but presents no evidence that this layer actually has this capacity, which means the chemistry of the tailings seepage water and the impacts to groundwater are unknown.
8. To decrease the risk of mine subsidence, which could harm wilderness lands and lakes, the mine plan should use a more conservative pillar width-to-height ratio (leave more support rock in the underground mine), and backfill the tailings.
9. The geochemistry of the ore and waste rock is based on a small number of samples and indicates more potential for acid mine drainage than predicted. The analysis relies on limited geochemical data from the Troy mine, but Rock Creek has a greater potential for acid generation. More testing is required.

10. The SDEIS lacks adequate baseline data for determining mine dewatering impacts to headwater streams within and below the wilderness.

11. The DSEIS should be withdrawn until sufficient data to predict impacts on the wilderness lakes, including Cliff and St.Paul Lakes, has been collected. The proposed buffers intended to protect the lakes from dewatering are not based in science due to a lack of data.

12. The DSEIS acknowledges reductions in stream flows will occur in bull trout habitat in Rock Creek, East Fork Rock Creek, East Fork Bull River, and Bull River, but contains no real analysis of the impacts to bull trout numbers.

13. The Rock Creek mine would destroy more than 400 acres of grizzly bear habitat and could displace bears from more than 11,000 acres, but only requires mitigation for 2,450 acres. The small population would be displaced from important habitat, and face greater mortality risks from an increase in poaching. Proposed mitigation, including education of miners and local residents about living in bear country, has proven to be ineffective.

14. A thorough cumulative analyses of the impacts of the Rock Creek and Montanore mines on grizzly bears, bull trout, and wilderness waters should be done to assess the combined impacts of both mines.

15. In sum, the DSEIS contains a woefully inadequate analysis of impacts and is proposing to use dangerous and outdated technology. For this reason, it should be withdrawn.

Your comment letter should be emailed to Michael Huffine, Project Coordinator @ rockcreekmine@fs.fed.us

**All of us need to let the Forest Service know we haven't been lulled into complacency and we aren't going away.
Our Lake and Wilderness are at Stake!**