



Protecting Montana's wildlife,
land, waters and hunting & fishing
heritage for future generations.

Nov. 16, 2017

Craig Jones
Montana Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

RE: Black Butte Copper Project Environmental Impact Statement scoping comments

Dear Mr. Jones,

Thank you for allowing public comment as part of the EIS scoping process for the Black Butte Copper Project. The Montana Wildlife Federation (MWF) is the oldest wildlife conservation organization in Montana. Since 1936, MWF has been at the table to protect Montana's fishing and wildlife, lands and waters and hunting and fishing heritage.

MWF is opposed to the Black Butte Copper Project, as it is a threat to the Smith River watershed, its fishery, recreationists and the local outdoor economy. MWF requests that the DEQ should consider the following during the EIS analysis:

A. The Smith River as an economic driver in outdoor recreation.

Valued as a \$10 million annual contributor to Montana's economy, the Smith River is a sustainable economic driver that supports small businesses, employs hundreds of individuals and brings growth to local communities. With Montana's outdoor recreation economy now being the largest sector of our state's economy – valued at over \$7 billion annually – it is important that we protect places like the Smith River as a high-quality experience for recreationists. Risking this sustainable resource for a copper mine would be jeopardizing local jobs and an economic driver that will far outlive a copper mine. DEQ should consider the value of the Smith River as part of the EIS analysis.

B. The Smith River and Sheep Creek as a wild trout fishery

The Smith River serves as an important wild and native trout fishery, and it is well documented that fish migrate from the Missouri River to tributaries of the Smith such as Sheep Creek to spawn. In addition to the high-quality habitat, these tributaries also act as a thermal refuge for fish when the Smith River experiences warm water temperatures and low flows. With the potential for ground or surface water contamination from mining operations, the DEQ should conduct a study of the fishery and consider potential risks

from contamination. This should be done with consultation from Montana Department of Fish, Wildlife, and Parks fisheries biologists and managers.

C. Potential risk of changes in water quantity or quality in Sheep Creek

In addition to Sheep Creek being an important spawning tributary for wild fish, it also accounts for nearly half of the flow for the Smith River during low flows. Downstream water users and fish populations already feel the pressures of low river flows in years of drought or low snowpack. Any changes to the water quantity in Sheep Creek due to the pumping of ground water for mining operations would potentially negatively impact fish and water users.

Similarly, negative impacts to the fishery could be seen from the creation of an acid mine drainage due to the sulfide deposits being exposed during mining processes. This could affect water quality in the Smith River drainage for hundreds of years and would likely require costly cleanup and water treatment in perpetuity. A report by Earthworks in 2012 looked at 14 different copper mines around the United States and found that 92 percent of these operations resulted in significant water quality impacts, the most severe of which were associated with acid mine drainages. DEQ should assess the potential for creating an acid mine drainage and the impacts to water quality.

D. The potential for mass expansion of mining operations near the Black Butte Copper Project

DEQ should also examine the potential for expansion of mining operations in the vicinity of the Black Butte Copper Project. Though Tintina Resources has claimed this is a small mining project, it continues to hold the rights to more than 500 mining claims covering an area of over 10,000 acres of both private and public lands in the area. This would likely have a lasting effect on the area and larger impacts to wildlife and fish in other tributaries to the Smith River through the creation of a large-scale mining district. DEQ should consider all impacts associated with the expansion of mining operations in the area.

E. One year is an insufficient amount of time to complete a draft Environmental Impact Statement (EIS)

For a project that is so controversial and that may have detrimental impacts to fisheries or the local outdoor recreation economy, MWF asserts that the deadline of one year to finish a draft EIS is an insufficient amount of time to address all of the aforementioned risks. The DEQ should consider asking Tintina Resources for an extension in the draft EIS process, in order to fully address all risks associated with the Black Butte Copper Project.

In conclusion, MWF requests that DEQ will be rigorous with the EIS analysis. The history of mining in Montana and the negative impacts from failed mines and costly reclamation is well documented. This pushes the real costs of mining onto Montana taxpayers. Making sure that the Black Butte Copper Project does not add to that poor legacy should be a priority for the DEQ.

Additionally, the economic benefit of the Smith River as part of Montana's booming outdoor recreation economy is something that should be protected now, and for the future. The Black Butte Copper Project represents a huge threat to not only to fish and wildlife, but the thousands of people from around the country who come to enjoy the Smith River each year. Thank you for the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read "William Geer". The signature is written in a cursive style with a large, sweeping initial "W".

Bill Geer
President