

Kootenai National Forest  
31374 US Highway 2  
Libby, MT 59923

August 4, 2025

Re: Response to Montanore Mine Fonzi

1. (2.12 Transportation) Libby Creek Road is at MM 44, not MM 42 (personal observation) what else does USFS have wrong in its Fonzi.
2. (2.4 Geochemistry) Wording on “potential release of nitrite due to blasting”. Lake Creek is on 303-d list for nitrates due to blasting from Troy Project mine blasting. No need to parse words, our new KNF Supervisor should know that the Noranda permit was pulled by MDEQ (1991) because of nitrate violations in their. Real-Time water quality monitoring would serve as the canary in the coal mine in this situation. In this day and age it should required as an operating condition.
3. (2.6.2 Groundwater) “The source of the groundwater is generally more than 1000 feet below the ground surface.” This is an ambiguous statement. Rain / snowmelt when not influenced by wind is subject to gravity. When it hits the land in mountainous terrain it either follows the terrain or is again influenced by gravity. When it meets bedrock it is then influenced by fractures, but still always with gravity in mind. So saying that the source in the adit is from groundwater at 1000 feet appears bogus. Otherwise; explain how the first water got down there in the first place? Nature abhors a vacuum; the larger the opening becomes the more water it will attract. This expression is realized in the documentation of increased water pumping that will occur as exploration proceeds. The Troy mine has been used as an analog for this proposal, yet no one has looked at what is happening inside that facility, nor is anyone really tracking what impacts this is having on lake creek. If an analog is an analog then agencies should be looking at what has happened in the past tense.
4. The documentation regarding road maintenance other than snow plowing and cleaning off bridges does not tell WHO will be responsible for overall maintenance of the Libby Creek Road? With road closures and heavy truck use, Montanore will have an inordinate amount of impact on

the roadway. Will the USFS be subsidizing Montanore activity when it comes to grading the road over the next 16 years of use?

5. (3.1 Existing and project disturbances) “The line, NO project disturbance is proposed on KNF administered lands; is incorrect.” Are the roads Montanore will use to access their project not considered KNF administered lands?

6. (3.1.4 Waste Rock Storage Area) What is the difference if any between the PVC liner in WRSA 1 and the HDPE liner that will go under WRSA 2? No analysis of how the liner under the current WRSA 1 has fared over the years has been done.

7. (3.7 Underground Drilling Program) “Drilling will not occur within 500 feet of the surface.” Followed by, “MMC will coordinate with the USFS for approval to drill closer than 500 feet.” Which is it? They will be able to or not? WTF does the USFS know that would decision allowing MMC to drill closer than 500 feet? Does this same logic apply to drilling within 1000’ of Rock Lake or the 300’ barrier from the faults? This is the kind of double-speak that causes problems with public perception, honesty and trust in regulatory bodies.

8. (3.8 Water Management) “The most recent sampling indicated that water contained low amounts of nitrogen in the form of nitrate and nitrite, and the metals arsenic, iron, sodium and zinc.” How nice! It’s also interesting that in neither the EA or the FONSI does the agency list what those values currently are, while it does list what the MPDES permit effluent limitations are? Why is that? The public should know what the current values are if the EA documentation is a full disclosure of effects.

9. Transportation Plan Pg. 11. “In the project area, MMC will manage and/or restrict unauthorized public access to to the work site during the Project to further enhance public and worker safety.” We assume this solely means motorized access and not ALL public access? What about non-motorized winter recreation activities such as cross country skiing, snowshoeing or people who hunt or trap? Will they be excluded from the area or would they simply be excluded from the fenced Montanore private property in the project area? This type of exclusivity for “Big business on the public domain

is unwarranted. Especially as it is being granted for a 16 year time frame. It also serves to precluded public oversight of activities on the public domain. The 1872 Mining Law already provides enough “exclusive rights” when an entity files a mining claim. IT should not be used to provide even more exclusive rights denying public access across its lands.

10. Cumulative Effects. The one thing the EA does not do is measure the cumulative effects the Montanore exploration project contains.

- a. financial commitment: The more money spent on this project the more economic incentive there is for the regulatory agencies to grant a permit to mine and grant exceptions.
- b. social anticipation: The community of Libby has a surplus of “disaster capital” from its previous adventures in mining (ie: W.R. Grace mine) and the close Troy mine, so there is a sense public expectation that the community deserves a mine.
- c. political: Politicians continually believe that “big industry” is the only way to go to bring economic development to their community and all other (social, environmental) determinants should be subservient to that design. Lots of rules, laws and oft times common sense are thereby trammled in the rush to bring economic development. Case in point is the Lincoln county Commissioners petition to lessen Selenium standards on the Kootenai, resulting from Canadian coal mining across the border.

11. The Cabinet Resource Group includes by reference all other conservation community (ie: MEIC, Earthworks, TU, Save our Cabinets, Yaak Valley Forest Council, Earth Justice , etc) responses to the Fonzi as its own.

Sincerely,

Cesar Hernandez (board member) for the Cabinet Resources Group  
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