



July 1, 2026

Hans Oaks
c/o Helena Ranger District
2880 Skyway Dr
Helena, Montana 59602
406-495-3730
hans.oaks@usda.gov

Re: Comments and concerns regarding Falcon Copper Corporation's Blue Copper Project, Draft Environmental Assessment, License #00878 Amendment

3

To U.S. Forest Service staff:

Montana Trout Unlimited (MTU) and Trout Unlimited, Inc. (TU) appreciate the opportunity to provide comments and share our organizations' concerns regarding the draft Environmental Assessment (EA) for amendment #3 to the mine exploration permit (license 00878) now owned by Falcon Copper Corporation, doing business in this case as the Blue Copper Project in the upper Little Blackfoot River watershed. While the EA and associated Plan of Operations (PoO) provides a fair assessment of the exploration drilling plan, it fails to consider significant water quality, aquatic habitat/ecosystem and fishery impacts. As importantly, for an exploration effort of this size in a watershed with the high quality fishery, agricultural, historic and recreational values the United State Forest Service (USFS) should require a full Environmental Impact Statement for this potential project, rather than allowing for this proposal to move forth via an EA-level analysis as an amendment to an exploration license.

As background, MTU has substantial long-term investment in the Little Blackfoot watershed. The Pat Barnes Chapter of Trout Unlimited (BBCTU), as one of the state's 13 TU chapters, helped form MTU decades ago. In conjunction with PBTU and the national TU organization, MTU has carried out our mission to conserve, protect and restore coldwater fisheries and their habitats in the Little Blackfoot through efforts to ensure public access, contribute to stream restoration projects, and help negotiate instream flow rights. This includes substantial invest by TU to restore stream health and function from damage done by historic mining.

THE VOICE FOR HEALTHY RIVERS & WILD TROUT SINCE 1964

Specifically, TU has been working in the Little Blackfoot River watershed for several decades, having implemented irrigation diversion improvements, fish passage, aquatic habitat, mine reclamation and other projects. Working with private landowners and funders like the Montana Natural Resources Damage Program, TU has improved water management and installed fish screens on Snowshoe Creek and Spotted Dog Creek, and worked to improve instream habitat on the mainstem Little Blackfoot River. More recently, TU and other partners – including Montana DEQ, Helena and Lewis & Clark National Forest, Deer Lodge Valley Conservation District, Powell County and private landowners – developed a cooperative effort to reclaim abandoned hardrock mines in the headwaters of the Little Blackfoot. The overall goal of the project is to protect human health and the environment by removing contaminated waste rock and soils from the Upper Little Blackfoot watershed and developing management measures for mine adit discharges.

Through numerous stakeholder meetings and analysis, these partners have identified the Upper Little Blackfoot River Mining Complex as a priority area for reclamation and has undertaken an aggressive effort to characterize mine sites in the drainage. The US Forest Service previously completed multiple phases of reclamation activity in the early 2000s in this area, and this collaborative group completed the reclamation of the Lilly Orphan Boy Mine in 2015 and the Blackfeet 1 Mine in this area in 2021 – with funding from the Montana Department of Natural Resources and Conservation and Montana Fish, Wildlife and Parks, among others. Trout Unlimited is the overall project manager for the project and responsible for stakeholder coordination, contracting professional services and fundraising. The Upper Little Blackfoot Mine reclamation project is scheduled to begin in 2027, with an estimate cost of approximately \$4.2M. In short, we have made long-term, significant investment in this watershed and seeing that it continues to rebound from historic mining impairments.

The Little Blackfoot watershed, including the tributaries in which the proposed mining activity would occur, is home to Montana's state fish, the westslope cutthroat trout (WCT), which is a state and federal species of concern. Montana's Fish, Wildlife & Parks and USFS staff continue to develop conservation strategies for WCT in the upper Clark Fork River that include priority areas for WCT in the Little Blackfoot. Our more than 5,000 supporters in Montana care deeply about this place and its aquatic resources.

Native/Wild Trout Fishery and Aquatic Resources:

Because of our organizations' joint missions, our primary area of concern when it comes to any large-scale development, such as mine exploration in a watershed is the native and wild trout fishery, along with the aquatic resources and habitat that sustain those fisheries. The Blue Copper Project draft EA, PoO and Aquatic Technical Memo fail to provide details about the Little Blackfoot

THE VOICE FOR HEALTHY RIVERS & WILD TROUT SINCE 1964

trout fishery, including in the most proximate surface water tributaries – Snowshoe Creek Ophir Creek, and Carpenter Creek. The Aquatics Resource Review (and EA) acknowledge that westslope cutthroat trout are a state and federal species of concern (or special interest) and are present in these tributaries, as well as the mainstem Little Blackfoot. The Aquatics Resource Review also correctly acknowledges that “the spatial boundary for effects to aquatic resources includes the local wetlands and stream channels within the project area downstream into and through the Little Blackfoot River HUC10 Watershed 170102105 (pg. 4, Aquatics Resource Review).” But the EA and associated documents do not provide any detail on WCT population size, evidence of migratory life history or genetics. For example, do tributary fish contribute to mainstem populations or vice versa? All of these elements of fishery baseline data are critical in making an environmental assessment of what is at risk from any action taken within the Blue Copper Project area. Furthermore, there is no data or analysis in the EA and associated materials on other fish species, whether native or wild, such as whitefish, sculpin, or brown trout, all of which are regularly surveyed by MT FWP in both the proximate tributaries and the Little Blackfoot downstream of the proposed project area. Again, baseline fishery data is essential to analyzing possible impacts in an environmental assessment. The EA should also require and include data from a full macroinvertebrate survey, since native and wild fish population size and health are inextricably linked to macroinvertebrate health, diversity and abundance.

Westslope cutthroat trout are especially sensitive to changes in water quality elements, such as temperature, sediment, pH, dissolved oxygen and pollutants. During spawning, egg development and rearing, these native trout are at their most vulnerable to water quality changes. The EA should address the literature on this topic, as well as any and all data on the use of the adjacent tributaries and downstream stretches of the Little Blackfoot by all life stages of native trout. The same should be done for the full complement of wild fish that inhabit potentially impacted tributary creeks and downstream waters. There are numerous actions within the EA that pose the risk of degrading water quality from road maintenance near tributaries to stormwater runoff from drilling operations. All such actions need to be analyzed more thoroughly in light of the necessary, much more robust fishery and aquatic resource data. It is woefully insufficient to simply state that “no significant effects to sediment delivery to streams, water quality, riparian areas, or aquatic habitat are anticipated, no significant effects to aquatic habitat or species are expected from project activities (pg. 37, draft EA).”

The USFS and the public need a much fuller understanding of the fishery and aquatic organisms on which that fishery depends, and its sensitivity to potential mine exploration activities in order to evaluate the risks this project poses. That is especially true for WCT. Without having more baseline data (population size, migratory life history and interaction throughout the

THE VOICE FOR HEALTHY RIVERS & WILD TROUT SINCE 1964

watershed, and genetics) it is unwarranted for the draft EA to conclude that “the proposed action may impact westslope cutthroat trout....but would not likely contribute to a trend towards federal listing or the loss of viability of a population (pg 37, draft EA).”

The draft EA and associated materials identify at least four “water/wet area crossing” where vehicles will cross streams many times, most every day for approximately five years (pg 26, Plan of Operations). Where stream crossings entail replacing culverts, the more protective measure of replacing existing culverts with ones that would pass the 100-year high flow regime would inherently be more protective of fishery and aquatic resources than using 25-year interval flows (which is the current stipulation for any temporary road culverts). This would more appropriately guarantee aquatic organism passage for all life stages, all times of year. Where possible USFS should consider requiring bridges to replace culverts. Two of the expected stream crossings are fords. The draft EA and PoO suggests that hardening fords is the appropriate “improvement.” There is no information about how or what materials will be used to harden fords. Hardening of any ford might be an improvement for travel and could reduce bank erosion/damage, hence, sediment release from the site. Those improvements are likely to be offset by the drastic increase in frequency of vehicles crossing these fords and the size/weight of the vehicles compared to current use of the fords. Thus the net effect at these fords is more likely to be degradation from heavily compacted banks and streambottoms. A far better solution would be to require bridges or culvert crossings, if possible.

All of the proposed road crossing work or any other instream work needs to abide by Montana law and permitting. Language in the Plan of Operations does not make clear that that will be the case. The PoO defines “instream work” as “any work below the ordinary high water mark,” whereas Montana’s ARM 17.24.105(6) requires that many exploration activities or materials must be located at least five feet above the ordinary high water mark. The PoO should conform to this more protective standard for instream work.

Montana has invested very heavily and wisely in preventing the spread of aquatic invasive species (AIS). While the draft EA recognizes the need for this project to take measures to prevent the spread of AIS, there are a few reasonable steps along those lines that are missing. Namely, the draft EA and associated documents make not indication that Falcon is consulting Montana Fish, Wildlife & Parks AIS program and program staff to ensure it is following BMPs for state waters. Falcon should be required to institute AIS BMPs approved by MT FWP.

Water quality:

THE VOICE FOR HEALTHY RIVERS & WILD TROUT SINCE 1964

The draft EA and supporting documents fail to address multiple impacts to water quality. The first of these deficiencies entails monitoring of water quality. There is no indication in the EA or associated documents of how water quality well locations are being selected. The EA states that “at least three monitoring well conversions, one each near the lower extents of the Ophir Creek, Carpenter Creek, and Snowshoe Creek drainages” will be installed (pg. 10, draft EA). The PoO reiterates this plan with the caveat that these monitoring wells won’t be installed in the first year of activities, meaning there will be no pre-project baseline groundwater monitoring associated with these wells (pg 28, Plan of Operations). The “conversions” mentioned will be drill holes that instead of being capped and reclaimed will be converted to monitoring wells. The draft EA nor Falcon’s PoO provide information about how the company will select drill holes to be converted to monitoring wells. It is far more appropriate for the USFS to prescribe monitoring well locations based on sound hydrologic assumptions/data about the interaction of drill holes with groundwater and the connection of groundwater in the project area to surface water. Siting monitoring wells “near the lower extents” of these three tributaries utterly fails to ensure that impacts to water quality from the project are being monitored. At the very least, there should be assurance that monitoring wells are placed between project activities (drill holes) and nearby surface waters, on the downgradient from project activities. A more responsible approach would be to consult a third-party hydrogeologist to work with USFS hydrology staff to implement a monitoring well placement and water quality data collection plan. Waiting for the mining company to propose which three drill holes will become monitoring wells is unequivocally not an appropriate or acceptable water quality monitoring plan.

The baseline water quality data that is included in the draft EA and associated documents is deficient. Groundwater testing that started only in 2025 indicates that every test hole encountered groundwater but the draft EA says nothing about how far more extensive drilling (up to 700 holes) to much deeper levels (up to 7000’) could impact groundwater, ground-to-surface water connections, transport of potential contaminants, or wells in the watershed. Similarly, surface water monitoring has only recently begun in the project area and has resulted in too little data over too short a timespan to constitute quality baseline before any project activity begins.

The draft EA correctly recognizes that the geology within the project area varies and, hence, the risk of drilling activities having an impact on ground and surface water varies. Specifically, the draft EA states that:

Drill sites where porous colluvial deposits are present on site or immediately downslope constitute a higher risk for surface water quality contamination due to seepage into or from the sump through porous deposits to adjacent wetlands and downgradient

streams through exchanges with the hyporheic (near surface stream-adjacent water) zone (pg 17, draft EA).

Yet the draft EA deems it fine that “Falcon, in consultation with the Forest Service, may consider re-siting the drill pad or using alternative water/drill fluid management strategies” when a planned drill pad is in one of these higher risk, porous deposits (pg 17, draft EA). In such cases, the USFS should require re-siting of a drill pad. Allowing a drill pad to be sited in a known higher risk area runs counter to the purpose of the draft EA, to ensure no significant risk to things like water quality if avoidable.

One of the primary water quality concerns MTU and TU have regarding this exploration effort, as well as the prospect of full-scale mining, is contamination of groundwater or surface waters from elements of the orebody being explored. As with most hard rock mining activities, the formation of acid mine drainage or the leaching of toxic metals, such as (but not limited to) arsenic, lead, and mercury, is a concern not addressed by the current draft EA. As the draft EA states, exploration has already occurred in the proposed project area, including over the last few years by Falcon Copper Corporation under the existing exploration license. Given this recent exploration, the draft EA should provide data on sulfide/pyritic content of the samples collected, as well as any data on metallic contaminants. If Falcon has data revealing the presence of copper, gold, silver, tungsten, germanium, and gallium in sufficient grades to warrant the level of exploration being proposed in this PoO and draft EA, certainly the company has data on other constituents of the orebody, or has samples that can and should be tested for their sulfide and heavy metal contents. If present, these elements pose serious risk of contaminating both the groundwater that will be encountered in drill holes (up to 700 of them) and the surface water into which that groundwater eventually flows.

The draft EA and supporting documents acknowledge that drilling fluids (which could impair surface and groundwater quality) will be used at each drill pad site within the project. It also acknowledges that these drilling fluids, along with sediment from drilling and the drill pad area itself, could mobilize with precipitation and stormwater. That is why the draft EA and company’s PoO documents actions or structures at each drill pad location to contain stormwater runoff. But these documents provide little to no evidence of the sufficiency of such actions or structures to contain stormwater runoff, drilling fluids or sediment in the event of any modeled stormwater events, such as 10-year, 50-year or 100-year rain-on-snow events and flooding. Modeling these types of historically significant and increasingly common flow/flood events is critical to establish that BMPs to prevent stormwater runoff from carrying any material from drill pads or other project areas into adjacent surface water, especially since project work will be year-round, including the times of year when there is the highest risk of significant stormwater or flooding events. Rain-on-snow events that could easily overtop measures outlined in the draft

EA and PoO, such as using “sediment traps, check dams, rock and gravel cover, fabric and/or certified weed free straw bale filter fences, siltation or filter berms, and mud sumps (pg 40, Plan of Operations)” are not hypothetical. The draft EA says as much, stating that “as atmospheric conditions change, the frequency of high-intensity storm systems is increasing (pg 31, draft EA). While that statement is in reference to “putting a strain on road systems” it applies equally well to the chance of uncommon stormwater runoff and the need to model such events to inform truly best management practices for this site. The 2022 500-year flooding of the upper Yellowstone in and around places like Red Lodge, MT, provide real world, recent warnings that should warrant the kind of modeling we propose is necessary. Thus, for both the proposed project implementation and reclamation period, the draft EA and PoO need to provide specific evidence or modeling of how the company’s proposed measure to prevent stormwater release from the site will hold up to potential (100-year) precipitation events including analysis that plastic drill sump liners, sediment traps or secondary containment for hazardous substances would be sufficient.

The draft EA provides insufficient evidence that drill holes will not encounter or cause groundwater to backflow to the surface. Simply stating that flow would not be expected to occur from the drillholes, eliminating the potential impacts from uncontrolled flow of groundwater and groundwater-containing drilling fluids back up to the surface is not the same as providing robust modeling of the local groundwater dynamics to substantiate this claim. In short, what evidence supports the expectation of no ground- to surface water impacts? Extensive drilling programs, like the one being proposed here, can have significant water quality impacts, primarily through the potential for contaminating surface and groundwater with drilling fluids, oil/fuel spills, roadwork, direct instream work, and the release of naturally occurring contaminants from underground drilling, such as acid mine drainage.¹

Furthermore the proposed actions to handle any unexpected backflow of artesian water poses serious legal questions. The Plan of Operations claims that “if artesian flow cannot be fully stopped after reasonable efforts, Falcon Copper will obtain a MDEQ discharge permit or convert the hole to a compliant water well with written landowner or surface management agency agreement (pg 51, Plan of Operations).” The Montana Water Use Act does not allow for a post-hoc groundwater right for artesian flow, nor can a DEQ-issued discharge permit be obtained after the fact of creating a new discharge. The USFS and project proponent must clearly articulate how artesian backflow from any drill hole will be handled legally in respect to the MT Water Use Act and/or the DEQ discharge permitting process. The Upper Clark Fork River Basin is closed to

¹ Muhammad Adnan et al., *Impacts of drilling on soil and groundwater heavy metal pollution: A comprehensive review*, Environmental Chemistry and Ecotoxicology. Volume 8, Pages 127-141 (2025). [Available online: <https://www.sciencedirect.com/science/article/pii/S2590182625002176>]

new appropriations of surface water. This closure does not apply to applications to appropriate ground water if the applicant complies with the provisions of MCA § 85-2-360, which requires that applications for groundwater appropriations in statutorily closed basins be accompanied by a hydrogeologic report prepared pursuant to MCA § 85-2-361. These requirements would need to be met prior to appropriating groundwater, not after the fact, as proposed in the PoO. Otherwise, any artesian backflow should be handled as described later in the PoO such that if “any drill hole produces artesian flow, the drill holes will be contained pursuant to state of Montana requirements and will be sealed by the method described in ARM 17.24.106 (pg 62, Plan of Operations).

Finally, all potential surface water impacts need to be evaluated in the context that the receiving waters – Snowshoe Creek, Carpenter Creek and the Little Blackfoot are already impaired. The draft EA acknowledges that Snowshoe Creek is impaired in its entire length (on the MT Department of Environmental Quality Total Maximum Daily Limit (TMDL) list) for “streamside vegetative cover, low flow alterations, nitrate/Nitrite, and sedimentation/siltation (pg 22, draft EA).” Carpenter Creek has a similar TMDL listing. The Little Blackfoot is on the DEQ’s TMDL list for arsenic, lead and sediment impairment. What the draft EA fails to acknowledge is that some of that impairment, including for sedimentation/siltation is from past mining activity in the area. In other words, any additional sediment is atop the ongoing impairment that mining has already caused. Clearly the project area is susceptible to sediment and other surface water impairments due to mining activity. The USFS has the obligation to consult the MT DEA on load allocations for each contaminant that each waterbody in the project area has an TMDL listing for and analyze what the potential new load allocations for the proposed exploration activities could be.

The draft EA recognizes that there could be increased sediment production during five years of exploration, plus a “couple” of years of additional sediment production before reclamation hypothetically works. The literature used to support this is cherry picked from a larger body of literature that shows activities like forest road maintenance and subsequent decommissioning still lead to many years of increased sediment runoff that reaches surface waters. Additionally, the draft EA and supporting documents rely, in part, on sediment and runoff from project site activities to be “filtered by the forest floor and riparian buffers” such that they are “not likely to reach aquatic resources (pg 33, draft EA).” Yet elsewhere in the analysis it is clearly recognized that many of the riparian buffers (RMZs) and native vegetation that make riparian buffers effective at filtering sediment and runoff are not fully intact or have already been substantially degraded. Literature supporting the filtering quality of intact riparian buffers does not apply when the actual riparian buffers of a project site, like this one, are degraded and lack the native vegetative cover. Additionally, some drill pads are being proposed to be placed within the known RMZs (or Riparian Habitat Conservation Areas (RHCA)). Thus the very buffers

THE VOICE FOR HEALTHY RIVERS & WILD TROUT SINCE 1964

meant to prevent degradation of surface water are being infringed upon by the project activities that pose the greatest risk of causing that degradation – drill pad placement and operation (pg 35, draft EA). No drill pads or other project activities should be allowed in RMZs/RHCAs. The RMZs/RHCAs in which drill activities would be allowed are described as not having the vegetation “that would be typical of a true riparian area, such as willow, cottonwood, alder, dogwood, and sedges, due to the incision of the stream channel, and disconnection from the floodplain (pg 35, draft EA).” The logic of this is that it is fine for the company to fail to abide by RMZ/RHCAs because they (the RMZ/RHCAs) are already degraded. Yet, it is those RMZ/RHCAs that are being held up as a primary means of preventing sedimentation or runoff from damaging surface water. There is no literature or evidence cited to justify that further damaging a damaged riparian buffer will still have a buffering effect. In all likelihood, it is just the opposite. These are the areas where the project activity poses unacceptable risk of sedimentation and runoff that will impair surface water.

Cumulative Impacts:

The draft EA fails to analyze the future, potential impacts of full-scale mining that could result from the exploration activities being proposed. The Montana Environmental Policy Act (MEPA) compels DEQ to look beyond immediately proposed actions to also consider long-term, cumulative impacts. USFS’s NEPA analysis can and should do the same. That should include scenarios for full-scale mining of the resource the company has already identified and plans to identify with this exploration effort. USFS is well aware of the potential, significant impacts of full-scale mining, especially open pit mining. Examples of such mines, permitted under NEPA/MEPA and the Montana Metal Mine Reclamation Act, that have and continue to require perpetual water treatment, investment of public dollars to fund required reclamation, or negatively impact the environment and human health include the Zortman-Landusky mine, Beal Mountain mine and Montana Tunnels. Even if future mining enabled by the currently proposed exploration were to be conducted underground, there is ample evidence that modern underground mines in Montana regularly cause unexpected water quality/quantity impairments and exceed bonding calculations for reclamation. As recent research has shown:

Based on a review of government documents, water quality predictions made during mine permitting were wrong at 11 out of 12 mines (91.7% of mines). Not only were water quality predictions incorrect in nearly every case, but the water quality impacts were often severe, including contamination of drinking water, loss of fish and wildlife habitat, harm to private property and agricultural

lands, and the formation of acid mine drainage that will cause lasting pollution that requires water treatment in perpetuity.²

Water Supply

The PoO and draft EA indicate that the proposed exploration work will require up to 24,000 gallons of water per day “to support drilling operations and any necessary dust abatement (pg 11, draft EA).” While this is a modest amount of water, it is in a closed basin where traditional (agricultural) water users regularly experience concern over water use and availability. That was certainly a priority concern for many of the local residents who attended a June 28 community meeting at the Avon Community Center. The water supply Falcon Copper Corporation has identified as sufficient and available to meet the exploration activity water needs warrant further scrutiny by the USFS (and Montana Department of Natural Resources and Conservation). Those sources are identified as “an existing placer mining pond off Ophir Creek and...an existing well off of Snowshoe Creek (pg 11, draft EA).”

As far as we can tell from the information provided in the draft EA and PoO, neither of the sources listed in the PoO can legally be used for mining exploration, nor is there sufficient legal water to satisfy the estimated peak usage of 24,000 gallons per day (see coordinates on pg 35, Plan of Operations). The placer mining pond on Ophir Creek is associated with a water right that no longer exists. The well adjacent to Snowshoe Creek is a domestic exempt well with an 8 gallon per minute flow rate (equal to 11,530 gallons/day) and an annual volume of 1 acre foot. Because one acre foot of water is equal to 325,851 gallons, even if this domestic exempt well could be used for commercial use (which would entail a change of purpose of use) it would only provide for about two weeks of peak usage (24,000 gallons/day).

Specifics of the water rights referenced in the PoO, as far as we can determine are as follows: The coordinates and details provided in the PoO at Section 2.9 and in Figure 2-5 point to the source of water indicated on Ophir Creek as Claim 76G 106712-00, a surface water right on Illinois Gulch, a tributary to Ophir Creek. This “unused placer mining pond” is on the Graveley Simmental Ranch. This claim was dismissed by the Water Court in 1995 during adjudication of the Temporary Preliminary Decree in Basin 76G. This water right is no longer valid for any use. The GWIC well listed on Figure 2-5 in the PoO as the source of water adjacent to Snowshoe Creek correlates to Ground Water Certificate 76G 30067405 in the DNRC centralized water rights database. This

² *Track Record: Montana Modern Hardrock Mining Water Quality Impacts and Reclamation Bonding*, September, 2018, <https://earthworks.org/resources/mt-track-record-report/>).

well is a permit-exempt well for domestic use, with a flow rate of 8gpm and a maximum volume of 1.00af. This well has a priority date of September 19, 2013. There are no records of a change in beneficial use on file with DNRC. The latter of these water rights is for domestic use, not commercial or industrial use. We also question to change in place of use that trucking water from the two identified sources to the project area would entail.

Need for an Environmental Impact Statement

The size, duration, and intensity of this exploration effort, along with the value of the potentially impacted resources and the laws governing the permitting process all warrant the USFS initiating a full Environmental Impact Statement. The project area is nearly 11,000 acres, of which there will be approximately 56.6 acres of surface disturbance (pg 2, draft EA). That includes more than 40 miles of roadwork. Exploration activity could entail up to 127 drill pads with six drill holes per pad for a total of more than 700 drill holes over a five-year project life of year-round, virtually around the clock work. Drill depths are proposed to be from 300-7000' deep. Federal law and the NEPA process clearly allow the USFS to initiate an EIS for this scale of mine-related activity on public lands. Courts have upheld or enforced EIS evaluations for exploration permits when, as with this one, size, scope and duration warrant. Initiating an EIS evaluation does not require that the public or agency pre-emptively prove that significant impacts will occur. Rather, the EIS process can be triggered if there are "substantial questions" as to whether significant impacts "may" occur (*Anderson v. Evans*, 371 F.3d 475, 488 (9th Cir. 2004)). Our comments alone raise substantial questions about water quality and fishery/aquatic impacts that have not been answered in the draft EA or supporting documents. That is to say nothing of the many more substantial questions raised by local landowners and partner organizations with concerns about wildlife, recreation, grazing, transportation, air, noise or the like.

Thank you for your consideration. Please let us know if you have questions or would like more detail about any of our comments and concerns.

Sincerely,



David Brooks
Executive Director
Montana Trout Unlimited



Casey Hackathorn
Montana State Director
Trout Unlimited, Inc.

THE VOICE FOR HEALTHY RIVERS & WILD TROUT SINCE 1964