

Data Submitted (UTC 11): 7/3/2026 1:10:26 AM

First name: Jen

Last name: Leuck

Organization:

Title:

Comments: Hans Oaks

c/o Helena Ranger District

2880 Skyway Dr.

Helena, Montana 59602

hans.oaks@usda.gov

Re: Blue Copper Project, Project #303864

Dear Mr. Oaks,

I am writing to ask the United States Forest Service to require a full Environmental Impact Statement for the proposed Blue Copper Project before allowing this exploration activity to move forward.

I am deeply concerned about the future of the Little Blackfoot River, the health of the watershed, and the people and communities downstream, including Avon, Garrison, and ultimately communities connected through the Clark Fork River system.

This is not just an abstract concern for me. I grew up in Helena and fly fished the Little Blackfoot River with my father and brother in the 1980s and 1990s. Some of my best memories are of being on that river when it still felt quiet, wild, and unspoiled, with no one else around. Long before fly fishing became romanticized by movies, that river was already meaningful to families like mine.

The last time I returned to fish along the Little Blackfoot, I saw no trespassing signs and evidence of mining activity. What appeared mostly abandoned was already an eyesore and a detriment to the stream. Now I understand that Falcon Copper is proposing a much larger exploration project in this same watershed.

According to the Forest Service project page, the Blue Copper Project would involve drilling on up to 127 drill pads, limited trenching, geotechnical and geochemical sampling, and geophysical surveys on lands managed by the Forest Service and Bureau of Land Management. The project area is approximately 20 miles west of Helena. Reporting on the proposal describes a project area of nearly 11,000 acres between Avon and Elliston, with drilling potentially as deep as 7,000 feet. This is not a small disturbance, and it should not be treated like one.

The Little Blackfoot watershed deserves the highest level of review. This proposed exploration is in or near a wild trout stream with important groundwater connections. The project also overlaps with public recreation values, including the Continental Divide National Scenic Trail, and is near habitat important to native fish and wildlife. Reporting on the proposal notes that Snowshoe Creek and Carpenter Creek, both within the watershed and project boundary, are already listed as impaired for degradation of fishery habitat. Adding large-scale drilling, road construction, water withdrawals, sediment risk, and possible contamination risk into an already sensitive watershed demands more than a limited Environmental Assessment.

I am especially concerned about groundwater and surface water. The Forest Service and Falcon Copper should be required to provide independent groundwater modeling, including the potential effects of drilling on groundwater movement and the connections between groundwater and surface water. In a watershed like this, drilling impacts cannot be responsibly evaluated without understanding where the water goes, how fast it moves, and how contamination or sediment could travel during normal conditions and during extreme weather events.

The project also raises serious concerns about stormwater, sediment, drilling fluids, and other contaminants entering nearby streams. The Forest Service should require a much stronger analysis of how the project would handle major rain-on-snow events, 20-year storms, 100-year storms, spring runoff, road failures, and erosion from new or reopened access routes. Reporting indicates the project could use approximately 41 miles of road and include construction of about 3 miles of new road. Roads, drilling pads, and disturbed soil in steep country are not minor impacts when they are placed in a trout watershed.

The public also deserves a clear, site-specific analysis of acid mine drainage and toxic metal release. Acid mine drainage forms when water interacts with sulfur-bearing minerals and can create acidic water rich in heavy metals. EPA explains that this acidic water can leach heavy metals from rock. USGS similarly notes that acid runoff can dissolve metals such as copper, lead, and mercury into groundwater or surface water. These are not imaginary risks. Montana has already paid the price for historic mining pollution many times over.

Montana DEQ's own materials describe the Upper Blackfoot Mining Complex, where acid mine drainage and mine waste contaminated surface water, sediments, soils, and groundwater, and where a failed tailings dam sent more than 200,000 cubic yards of mine tailings downstream into the Blackfoot River system. That history should be a warning, not a footnote. We know far more now than people did during earlier eras of mining. Knowing more should mean doing better.

Water use is another major concern. Reporting on the Blue Copper proposal states that, if approved, Falcon could withdraw up to 24,000 gallons of water per day from nearby streams and operate drilling equipment 24 hours a day. In a drying West, this matters. Between drought, development, agriculture, industry, and new demands such as data centers, water is becoming more contested and more precious. The Little Blackfoot should not be treated as an expendable water source for speculative mineral exploration.

I ask the Forest Service and Falcon Copper to provide, at minimum:

1. An independent groundwater model evaluating drilling impacts, groundwater movement, and groundwater-to-surface-water connections.
2. A full analysis of potential impacts to the Little Blackfoot River, Snowshoe Creek, Carpenter Creek, and other tributaries in the watershed.
3. A detailed stormwater and sediment-control analysis that accounts for rain-on-snow events, major runoff years, 20-year and 100-year storms, road failures, and emergency containment.
4. A site-specific geochemical analysis addressing the risk of acid mine drainage and the release of arsenic, lead, mercury, copper, zinc, and other toxic metals into groundwater or surface water.
5. A full accounting of water use, including daily withdrawals, seasonal timing, drought conditions, effects on streamflow, and cumulative impacts.
6. A more meaningful public process, including additional time for public comment and at least one public meeting in the affected area.

Without these answers and without this baseline data, the Forest Service should not permit this activity. The Little Blackfoot River is too important to the people, wildlife, fisheries, and communities of Montana to gamble with incomplete information.

Mining is often described in terms of jobs, minerals, and economic opportunity. Those things matter, but they do not matter more than clean water. Humans cannot survive without water. Trout cannot survive without clean, cold

streams. Rural communities cannot thrive if their groundwater and surface water are put at risk.

Please do the responsible thing: require a full Environmental Impact Statement and do not allow the Blue Copper Project to move forward unless and until the risks to the Little Blackfoot watershed, downstream communities, groundwater, fish, wildlife, and public lands are fully understood.

Thank you for the opportunity to comment.

Sincerely,

Jennifer Leuck