



## Rock Creek Talking points:

The Environmental Impact Statement (EIS) predicts that there will be substantial impacts to public lands with high conservation value, including the federally designated Cabinet Mountains Wilderness, Outstanding Resource Waters, threatened bull trout and grizzly bears, and the lower Clark Fork River watershed. The EIS includes several major problems and inadequacies, including:

**1) Waste storage putting the Clark Fork River at risk:** The mine plan relies on an unsafe dam design for storing mine waste next to the Clark Fork River. It's the same outdated technology used at Mount Polley mine in B.C. and Samarco mine in Brazil—both of which suffered major tailings dam failures in recent years. Please require an up-to-date tailings dam design and reconsider backfilling mine waste into the underground tunnels. Backfilling is now the norm at underground copper mines.

**2) Dewatering of native trout-filled streams:** The EIS predicts that the mine will reduce stream flows in bull trout strongholds, including Rock Creek, East Fork Rock Creek, East Fork Bull River, and Bull River, yet it does not fully analyze impacts to bull trout or its habitat. Please take a hard look at how local and core-area populations in the project area will respond to the impacts of dewatering, increased water temperature, sediment and water pollution, and the substantial cumulative threat of the proposed Rock Creek and Montanore mines.

**3) Acid mine drainage polluting wilderness waters:** The ore and waste rock geochemistry is based on a limited number of samples and indicates a higher risk of acid mine drainage than the Troy Mine, which is being incorrectly depicted in the EIS as comparable to the Rock Creek mine. Please require more extensive geochemical analysis, to be publicly reviewed, so that we can get an accurate picture of potential impacts to surface and groundwater.

**4) Collapse of overlying wilderness:** To prevent subsidence in the underground tunnels, the mine plan should use a more conservative pillar width-to-height ratio, and consider backfilling of the underground tunnels.

I urge the Forest Service to reject the proposed Rock Creek mine plan. Please ensure that the next go-around contains adequate baseline data on streams and rivers potentially affected by reduced streamflows, a thorough and updated analysis of the effects on bull trout and bull trout habitat, and an updated mine waste disposal plan that considers backfilling and safer tailings dam construction. Thank you for protecting our irreplaceable waterways.