AUG 1 5 2017

Objection Reviewing Officer,

August 11, 2016

I have presented my objections and related comments to KNF responses to my comments submitted to the KNF EIS 2016. I have tried to simplify my objections by using the KNF coding for issues and my code as a commenter (343) so that the original comment can be tied to KNF's response and my objection. I hope this works for you.

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343-Comment topic # 2112 (from 2016 EIS comments)

343-There are High tension powerlines that cross the area where the tailings impoundment will be sited. This critical infra structure has to be protected and emergency action plans established in case of a failure of the tailings impoundment. Any housing or other private property that could be impacted by Hecla mining activities should be identified and included in an emergency action plan. Private water wells should be routinely monitored for any contamination or abnormal production.

See KNF response #2112:

343- Additional comment in response to KNF response #2112:

The BPA powerline is immediately adjacent to the tailings impoundment and could feasibly be impacted by a tailings pile failure. The KNF response is dismissive of any possible risk to the BPA powerlines . There should be a minimum distance from the impoundment toe wall to any part of the powerline that would eliminate any risk posed by a paste tailings 'slump'.

343 Additional comment /objection, in response to KNF response #2112:

There is no mention of monitoring private water wells sited adjacent or downslope from the tailings impoundment.

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343 Comment topic # 6314 (from 2016 EIS comments)

343-I am assuming that the proposed Rock Creek Mine will be excavated with explosives and diesel powered equipment. I have read that the exhaust air will be conveyed by a nearly vertical adit that terminates near the wilderness boundary. How will this affect the wilderness air shed? How will this be monitored?

See KNF response #6314

343 Additional comment / objection, in response to KNF response #6314:

I would ask that there be some requirement for ongoing, periodic monitoring of mine ventilation adit discharge to see if there are any adverse effects on receptors due to climate change effects or other causes including changes in mining operations. I object to the implied idea that the area impacted by the ventilation adit, the content of the ventilated exhaust or the quantity of waste exhaust from the mine is constant or stable. KNF should have regular reports on actual impacts compared to expected results given in the SEIS.

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343 Comment topic # 6501 - 6507 (from 2016 EIS comments)

343-Hecla, by adding more water to the already saturated soils beneath their proposed tailings pile are also setting the stage for a land slide that would cause the soil beneath the Specialty Beams sawmill, the BNSF RR tracks and Highway 200, to slip toward the Clark Fork River. This is no trivial matter. The Montana DOT has spent millions to repair the damage to Highway 200 caused by the slippage of the saturated soils above the highway. Both Montana DOT and the BNSF Railroad (Montana Rail Link) should be advised of the detailed plans proposed by Hecla for waste water disposal and the possible consequences of a 300' high tailings pile on top of unstable saturated soils that are above the transportation infrastructure. It is Hecla's intention to develop the Rock Creek Mine without any detailed plan.

See KNF response #6501-6507

343 Additional comment / objection in response to KNF response #6501 - 6507:

The severe geographic constraints on the location of the tailings impoundment and the close proximity to the Clark Fork River, demand a higher level of scrutiny than the piecemeal approach offered by the KNF in their several responses to the many comments asking about these issues. I am not convinced that the engineering and the analysis have comprehensively addressed the combined effects and the challenges posed by extreme weather events and earthquakes.

I am extremely concerned about the paste tailings and their long term stability and this concern is heightened by the use of the 'conditional' would be language in Hecla's SEIS Volume 1 – Alternatives pages S15, S16 concerning the details of Paste tailings processing, impoundment and long term management. 'Would be' is not the same as 'will be'. Has this Paste technology ever been used in a location similar to the one existing along Highway 200 and the Clark Fork River? I counted over ten uses of the 'would be' language on page S-16. All of these 'would be' proposals can also be read as 'would be, except in the case of.....(lots of reasons). This whole tailings plan is conditional based on who knows what unforeseen event or surprise revealed after it is too late to remediate.

The addition of more water to the area around and below the paste tailings impoundment poses a serious risk to private and public property and critical infrastructure down slope from the impoundment. This area is already saturated with a very high water table and more water will only

add to the risk of land slip / slide that could impact the BNSF / MRL right of way and MT Hwy 200. Because of these additional risks, I cannot see any reason for Hecla to refuse to use paste - backfill methods to dispose of mine tailings instead of using a 325' high Paste impoundment.

There is another compelling reason to require Hecla to employ paste backfilling as a method of disposing of the tens of millions of tailings waste. With paste backfilling of mined out areas, the threat of subsidence can be successfully mitigated.

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343 Comment topic # 6803 (from 2016 EIS comments)

My concern is based on the certainty that mining activity in the rock creek drainage will generate waste rock and mill waste (tailings) and potentially large volumes of water. The mining will disrupt the normal hydrology and provide multiple conduits for waste water that will be pumped out of the mine or simply find a more direct path to the outside of the mountain. Originally the mine operators proposed 2200 gpm but later reduced this estimate to 315 gpm. There seems to be some considerable uncertainty about the water volume. Since nearly all of the mine waste water will end up in the Clark Fork River, it should be a top priority for the mine operator (Hecla) to study the hydrology and develop a water management plan that is conservative and realistic and most importantly based on reliable data.

See KNF response #6803

343 Additional comment / objection in response to KNF response #6803:

The SEIS describes a mine and mill waste water management plan where; there would be no uncontrolled, untreated discharges of mine drainage or process wastewater directly to surface water during exploration, construction or mine production. A leak, a valve or tank failure are all uncontrolled discharges and it is hard to believe that, when failures happen, no untreated wastewater will get into surface water. Going into this mine construction and development, Hecla should have a Quality Assurance process plan that identifies all risks and has flow charts that describe the actions to be taken when things go awry. If there is a plan, where is it and if there is no plan, why not? Mechanical and material failures are normal occurrences in complex operations and disasters are avoided by recognizing risks and planning for responding to inevitable spills, leaks, and floods.

343 Additional comment / objection in response to KNF response #6803:

When speaking of surface water and discharges into surface water, it needs to be understood that, in the areas adjacent and downslope from the RCM paste mill and paste tailings impoundment, surface water is a few feet from the underground water table. Any uncontrolled spill or leak could potentially find its way below the surface and into the aquifer. I have a big question about how much water (in excess of normal seasonal flows) can the gravels below Specialty Beams sawmill, handle before they surface and begin to erode a path to the Clark Fork?

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343 Comment topic # 6823 (from 2016 EIS comments)

Looking beyond the issue of additional water, there is the quality of the additional mine waste water. Hecla states that the waste water they plan to discharge into the Clark Fork River is cleaner than the

river water itself. We already know the river is polluted with a great many noxious and toxic materials and has been so since mining and population growth boomed in the 19th century. For Hecla to 'brag' that their waste water from the proposed mine is 'cleaner' than the horribly abused Clark Fork River is a cruel joke. The fact of the matter is, the river water below the Hecla Rock Creek Mine discharge, will be measurably worse than the water upstream due to the addition of Rock Creek Mine's tailings drainage and other waste water.. The water flowing into Lake Pend'Oreille will be dirtier than before Hecla initiates its discharge, and so it goes. Finally, the Hecla discharge will definitely degrade the river and Lake Pend'Oreille.

See KNF response #6823. I could not find a relevant response to my comment in the SEIS record.

343 Additional comment / objection in response to KNF response #6823:

The SEIS should have an analysis of the pollutant load of the Clark Fork River above and below the Noxon Dam and below Miller creek to the Noxon bridge to provide base line data for determining the actual effect of any discharges from the RCM, planned or unplanned.

<u>343 Comment topic # 6828 (from 2016 EIS comments)</u>

Avista had published an engineering survey of the possibility of direct discharge of mine waste water (treated, or not?) into the Clark Fork River below the Noxon Rapids Dam. Avista had extreme concerns about any kind of diffuser pipe in the river due to extreme forces present during high flows resulting in there being no adequate method to anchor any such diffuser pipe in the river. Avista also had major concerns about any waste water discharge pipeline crossing the Avista right of way along the river. Avista would require a nearly failsafe network of sensors, automated valves and other controls to handle any spill or broken pipeline. How are these issues being handled by Hecla in their planning?

See KNF response #6828

343 Additional comment / objection in response to KNF response #6828:

It should be noted that Avista has recently been sold to a Canadian Company and this may or may not have any impact on the potential need for discharge permits etc. in the future.

343 Additional comment / objection in response to KNF response #6828:

Avista and it's subsequent Canadian owner are constrained in their activities and what they allow to be done in the river and along the shores of the river and it's tributaries. The needs and wants of Hecla RCM, assuming the mine will be permitted, may be secondary to the utility and this may cost Hecla dearly. Hecla's SEIS is not convincing on the subjects of waste water discharge from the mine and the means of treating and disposal are risky considering the hydrology downslope from the paste tailings impoundment. Any unplanned and unmitigated discharges to the Clark Fork river (Lake Pend'Oreille) could result in severe consequences for Hecla Mining.

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343 Comment topic # 6845 (from 2016 EIS comments)

Waste water to be treated 'In Perpetuity':

Whenever I see this statement in an official document relating to waste water discharge from a mine or any other source, I just shake my head. How on earth can this boilerplate nonsense be used as a description of a program of mitigation for any type of illegal discharge into the ground, a spring, a creek, a river or the ocean. Please define perpetuity in the context you put forth in your SDEIS. Please give an example of a working treatment system that will function as designed 'in perpetuity.

See KNF response #6845

343 Additional comment / objection in response to KNF response #6845:

History tells us plenty about how well actual mine reclamation works and how insufficient the trust account funded reclamation bonds have been. Mining companies operate their mines for profit and they will cut corners when they can get away with it in order to maximize their ROI. Reclamation is purely a cost and it will be minimized at every level. KNF and the third party oversight groups need to exercise their obligation to hew to the law and ensure that adequate reclamation is funded and the work is done right for as long as it takes. Follow the laws. Protect the water, the wildlife and the people who live in this watershed.

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343 Comment topic # 7704 (from 2016 EIS comments)

Social Impacts of increased population:

The addition of 300 workers and their families to western Sanders County will have a large impact on the current residents, the schools, the roads, law enforcement, fire protection and EMS. Our fire and EMS services are all staffed by volunteers and are prone to being overwhelmed by large or complex emergencies. There is no effective and consistent, centralized command and control between the various agencies that could be set up quickly during a large scale emergency. All other county services would need to expand to handle the increased population.

See KNF response #7704

343 Additional comment / objection in response to KNF response #7704:

It would be beneficial for the hearings relating to mitigation of 'social impacts' due to mining operations, were announced in advance and held in the communities impacted by the development.

These are my comments and I submit them to the USFS ,

Objection Reviewing Officer

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Thank You and Best Regards,

Dave Lyman