



Montana Fish, Wildlife & Parks

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October 21, 2011

Kathy Bushnell
Helena National Forest
2880 Skyway Dr.
Helena, MT 59602

Subject: Mike Horse--Repository Siting Study for the Upper Blackfoot Mining Complex

Dear Ms. Bushnell:

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to comment on the Repository Siting Study the US Forest Service and Montana Department of Environmental Quality have put forward for the upper Blackfoot River Mining Complex. FWP has been involved in advocating for timely and thorough clean-up of mining contamination in this area. FWP is also keenly aware of the ecological risks associated with the status quo at the Mike Horse tailings dam.

FWP has reviewed the Executive Summary for the Siting Study regarding alternative sites associated with the clean-up of the Mike Horse Mine area. FWP's fish and wildlife staff have also attended various site visits to Section 35 and the Paymaster sites. Based on FWP's review of the repository options, we agree that the preferred Section 35 alternative may provide the most suitable site given our understanding of the current options. FWP recognizes there is likely no ideal location for a mine repository. Our primary interest is that the repository minimize the ecological risks associated with mining wastes and the potential for downstream water quality and fisheries. Native trout fisheries Horse Fly Creek, Alice Creek, Landers Fork and Shave Gulch elevate concern in those potential areas. We do not believe the Paymaster site is suitable as a repository due to its location relative to the Blackfoot River.

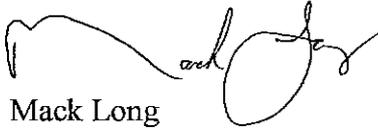
Unless a different option is more fully developed and brought forward, the low-elevation gentle slopes of Section 35, distance from streams/wetlands, and drier and deeper soils all point to Section 35 as a potentially viable option for a repository. FWP has surveyed fisheries in Section 35 in lower Nora Creek near the proposed repository site. The stream is a very small headwater stream and supports westslope cutthroat trout present in very low densities. The Nora Creek

riparian area has a history of stream related disturbance, which includes past timber harvest practices, roads, heavy riparian grazing, and fish passage barriers.

If Section 35 were selected as the repository site, more detailed investigations of site conditions will likely be warranted, particularly with respect to potential groundwater interactions. FWP's primary concern is full containment of the mining waste and full separation between repository waste and groundwater. Minimizing surface disturbance is a concern for both fisheries and wildlife habitat in the area of Section 35. Riparian and perhaps upland restoration actions in the Nora Creek watershed should be incorporated into the project in order to offset disturbance of fish and wildlife habitat during and after construction.

We hope our comments will contribute to a timely decision and thorough clean-up of the Mike Horse Mine site. Thank you again for providing the opportunity for our review of this study.

Sincerely,

A handwritten signature in black ink, appearing to read "Mack Long", written in a cursive style.

Mack Long
Regional Supervisor

ML/sr