

From: Logan McInnis [mailto:almcinnis@msn.com]
Sent: Friday, October 21, 2011 10:56 AM
To: FS-comments-northern-helena
Cc: chris@clarkfork.org; grimesm@linctel.net; 'traci sylte'; 'Jack McInnis'
Subject: Mike Horse comments

Dear Ms. Bushnell,

My name is Logan McInnis, I'm a civil engineer practicing in Missoula. My family and I are also part time residents of the "other half" of Section 35 and have been since the late 1970's. "Part time" for us means that almost every week someone from our family or friends visits the cabin, which sits perhaps 400 yards from your proposed tailings repository site in Section 35. I urge you to reconsider your selection of the Section 35 site for the Mike Horse Mine Tailings Repository.

I believe the environmental review process for this project has been inadequate at best. This removal action constitutes half of the volume of tailings removed from the Milltown Dam Superfund site, yet the level of environmental review (an 83 page final report which is primarily a review of earlier documents) is not even in the same ballpark as that for Milltown Dam. From my admittedly limited understanding of the NEPA process, I don't believe the environmental review would meet the requirements of NEPA. All I can conclude then is that the USFS/DEQ are hiding behind a "Superfund" designation to complete a much more limited environmental review for this project. If so, where were all these repository sites included in a Superfund boundary and why were adjacent landowners never informed that they were living in or adjacent to a Superfund site?

I see a number of very problematic technical issues with the repository study. Your final report states that further groundwater data will be required to characterize the Section 35 site. This need appears to be driven by the legitimate concern about shallow groundwater at the site (as evidenced by artesian conditions in several wells). I simply cannot comprehend why you would make a final site selection prior to having collected the relevant data and fully characterized groundwater conditions on the site. I don't consider this additional data to be "design level" data, but data critical to determining whether or not Section 35 is an acceptable location for contaminated tailings. Once the final site is selected through your process, I believe it will be nearly impossible to reverse course regardless of what your new groundwater level data says.

Your executive summary fallaciously claims there are no downgradient residences within 2 miles of the Section 35 site. I would cordially invite you and your consultants to visit our cabin which sits perhaps 400 yards from your proposed repository and at a lower elevation and see if you still conclude that that statement is correct. Even if your Executive Summary meant to state that there are no downgradient water wells, I would challenge you to present data proving that our well is not downgradient of the repository site. While we sit across the Blackfoot River from repository site, I find no data to prove that the river creates a hydraulic divide between our well and the repository site. Furthermore, both my family and the Grimes family own property which is clearly downgradient of the repository site and would clearly be impacted by potential contamination of the groundwater resources.

Given the lack of understanding of groundwater conditions on site mentioned above, it makes no sense at this stage in the site selection process to not plan for a liner under the repository. It appears that approximately an additional \$1.3 million cost should be included in the Section 35 cost estimate to make sure that adequate funds are available to build a repository that is adequately protective of the Blackfoot River provide a liner. This is especially important given your proposed repository site lying within a few hundred feet of both the Blackfoot River and Nora Creek.

I believe that inadequate consideration was given to other alternatives. Two of the 4 “feasible” alternatives shown in Table 2 of the Executive Summary require acquisition of private property (Bouma property provides access to the Horsefly site and the Solvie family owns the Alice Creek 7 site). In neither case were the landowners even approached about their willingness to sell those properties. In both cases, the proposed site or access road would essentially be in plain view of their residences.

I don't believe the cost estimates for this study were presented in a transparent manner. If you delve into the appendices, you will find unit prices for hauling tailings but no explanation for how those unit prices were determined. Since the haul costs for all alternatives ranged from 10% to over 50% of the total project costs, I think it is reasonable to expect that those unit prices would have been explained somewhere in the report. How, for example, did the report conclude that the unit cost of hauling to the Section 35 site (\$4.67/CY) could be cheaper than the unit cost of hauling to the First Gulch site (\$4.83/CY). As stated in the report, the Section 35 site is 8.5 miles from the Mike Horse site compared to 6.7 miles to the First Gulch site. Furthermore, the trucks would be returning empty from the First Gulch site because you have included a separate cost item for hauling borrow material from a different site.

One significant cost factor that was completely ignored in the alternatives analysis was the potential cost relative to highway improvements necessary to accommodate approximately 100,000 fully loaded gravel trucks (tailings hauled one direction, clean fill hauled back the other direction). I made one phone call to the District Administrator of the Great Falls District of the Montana Department of Transportation, Mick Johnson, and ascertained that asphalt overlays would likely be needed on these highways to accommodate the impact of this project. I made one additional phone call to an estimator for one of the large asphalt companies and came up with an approximate cost of \$250,000 per mile to design and construct a highway overlay. This could easily add \$1.25 million to the cost of the Section 35 alternative and perhaps \$625K for the First Gulch/Paymaster alternative. In the space of 15 minutes, I identified a cost factor that could legitimately increase the cost of your proposed alternative by 10%. I again wonder why your review did not ask this type of question?

I believe the answer lies in the fact that DEQ/USFS predetermined the desired location for the tailings and only seriously studied that site. Furthermore, I believe the cost estimates (ex. Excluding liners, ignoring impacts to the highway system, questionable assumptions about haul costs) were skewed to make this site more attractive. The ballpark numbers I presented above would reduce the cost difference between Section 35 and the First Gulch/Paymaster alternative by nearly \$2 million and if the underlying haul costs are challenged the cost difference could be even less.

This proposal is the kind of process and solution I would expect a mining company to come up with, not our government agencies. But I guess government is no different than private industry when it is the one footing the bill. I have made the mistake until very recently of assuming that these agencies would fully review all of the impacts of each alternative (not just the capital cost), would collect all the required data prior to making a decision and would select remedies that are fully protective of our environment. Apparently I was wrong.

In closing, I urge you to reconsider this decision. Your report clearly makes no effort to assess the impacts of the proposed location on nearby property values or the ability of neighbors to enjoy their properties over what appears likely to be a 10 year project implementation. You have selected the least cost alternative to the government (with questionable cost assumptions stated above) and decided instead to let a relatively small group of neighboring landowners bear the brunt of the project impacts.

Sincerely,

Logan McInnis, PE

From: Logan McInnis [mailto:almcinnis@msn.com]
Sent: Friday, October 21, 2011 6:42 PM
To: FS-comments-northern-helena
Subject: Mike Horse comments

Dear Ms. Bushnell,

I offered the following comments earlier today and realized that I forgot to include my contact information. I offer them again and this time have included my contact information. My name is Logan McInnis, I'm a civil engineer practicing in Missoula. My family and I are also part time residents of the "other half" of Section 35 and have been since the late 1970's. "Part time" for us means that almost every week someone from our family or friends visits the cabin, which sits perhaps 400 yards from your proposed tailings repository site in Section 35. I urge you to reconsider your selection of the Section 35 site for the Mike Horse Mine Tailings Repository.

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family and the Grimes family own property which is clearly downgradient of the repository site and would clearly be impacted by potential contamination of the groundwater resources.

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Missoula, MT 59804
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