

January 27, 2006

Joan Hesketh
Associate Deputy Minister
Environmental Assessment Office
2nd Floor Yates St.
PO Box 9426 Stn Prov Govt
Victoria, BC V8W 9V1

Dear ADM Hesketh,

As leaders in the hunting, angling, outfitting and outdoor recreation communities on both sides of the border, we are writing to express our shared interest in maintaining the present fish, wildlife and recreational values in the Transboundary Flathead Valley.

We are aware that the Cline Mining Corporation plans to apply for a mining permit in the Foisey/Lodgepole drainages of the Flathead and Elk Rivers. We also understand that Cline has initiated the environmental assessment process with the Environmental Assessment Office. We believe that our on-ground expertise in the valley, and our representation of economic and community interests in the Flathead, need to be considered as you develop the terms of reference for the Foisey/Lodgepole mine EA.

It is essential that the environmental assessment address the impacts to the watershed at a basin-scale level, rather than on a site-specific basis. Given that there is the potential for multiple coalfield and mineral development proposals (Lillyburt, coalbed methane drilling, and gold exploration and possible mining) in the Flathead, we feel that the environmental assessment needs to be comprehensive, at the watershed level, including a baseline assessment of water, fish and wildlife. The EA should specifically address a framework for considering cumulative effects.

We are aware that there is currently a significant lack of baseline data with respect to water, fish and wildlife in the watershed. An environmental assessment needs to ensure that there is a history of comprehensive long-term baseline data in place prior to permitting any mining activity in the watershed. Without this data, it will be difficult to accurately assess the impacts of the mine. Impact studies should be based on multi-year studies, not just one or two seasons of data collection. It should also take into account the diversity of aquatic species and wildlife species in the region, and not just be limited to fisheries and big game species. For example, there appears to be an isolated population of marmots within the proposed mining site that deserves further study.

We are also concerned about the lack of baseline data for specific species-at-risk within and around the proposed mining site at Foisey Creek. Known occurrences of species-at-risk in the upper Flathead watershed include bull trout, westslope cutthroat trout, Columbia mottled sculpin and the tailed frog. Mammal species-at-risk include fisher, wolverine, badger, Rocky Mountain bighorn sheep and grizzly bear. With respect to grizzly bears, according to the Ministry of Sustainable Resource Management, "The watershed functions as the center of the linkage between the Northern Continental Divide Ecosystem Population in the United States and contiguous populations of grizzlies in Canada and as a recruitment source for Alberta, the state of Montana and adjacent ADM watersheds in British Columbia" (2003). In addition, the Southern Rocky Mountain Management

Plan identifies the area in and around Foisey Creek as a “core grizzly bear area” to be managed for high population densities.

We are concerned that there are impacts from coal mining that can be difficult to accurately assess, such as the increased human access to the Flathead from up-graded roads and new roads. In addition to increased sedimentation and erosion directly into the river, roads impact fish and wildlife indirectly through road kills, increased hunting and fishing pressure, and overall increased human presence and development in an area. One of the most unique and wonderful aspects of the Transboundary Flathead is the solitude and wildness in a rich, broad valley. The EA needs to document these human and wildlife values and evaluate the various impacts of an intensive industrial development. Finally, a comprehensive assessment needs to take into account the current socio-economic values of the Transboundary Flathead and the economic and societal value of leaving the watershed un-industrialized. (We don't consider timber harvest as an industrial activity of the same magnitude and impact as the extraction of non-renewable fossil fuels.) Beautiful, intact and wild landscapes with healthy fish and wildlife populations are an economic asset for communities that are trying to diversify their economic base. We already are seeing this emerging economic trend in communities on both sides of the border. More specifically, the economic impact to communities and individuals that rely on the Transboundary Flathead needs to be considered in an assessment of the coal mine.

The Flathead Valley is exceptionally valuable to us because our livelihoods and way of life depend upon an intact landscape, clean watershed, and relatively low human presence in the river valley. At a broader scale, even as the “supply” of wild places like the transboundary Flathead diminish across the globe, “demand” is growing among visitors, residents, and amenity entrepreneurs who increasingly seek out such places. These places are a key asset and an important anchor for our local economies as they seek to diversify and prosper. In British Columbia, guide outfitting alone generates \$116 million a year. In Montana, the clean waters of Flathead Lake and the pristine wilderness of Glacier National Park are a primary driver of the state's \$2 billion annual tourism industry. Given the importance of this entire drainage to us and the economy of our local communities, we would like to ensure that the EAO takes into account the full range of potential impacts of the proposed mine, at a scale appropriate to the diverse and internationally significant wildlife, fisheries and other natural values of the Transboundary Flathead River Valley.

In an April 26, 2004 letter to community and business leaders in the Elk Valley, MLA and current Minister of Mines Bill Bennett raised a fundamental question that has yet to be addressed. Regarding another proposed coal mine in the Transboundary Flathead Valley, Mr. Bennett noted the importance of the existing mines in the Elk Valley, but, he said, “there is still the issue of ‘what is enough’ resource extraction in one relatively small area, and the cumulative impact on land and water.” While no one would argue that the existing coal mines should go away, many of us do question whether it's appropriate to expand this high-impact industrial sector into the adjoining Flathead and Lodgepole/Wigwam valleys. We suggest that this is a necessary “big-picture” question that needs to be addressed in the terms of reference, in the EA, and in the ultimate decision on the proposed mine. We look forward to your response. Please reply to one or both of the following contacts, and we will share your reply with other signators.

Flathead Coalition
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Thank you for considering our input.

Sincerely,

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CC: The Honourable Gordon Campbell, Premier of British Columbia
Governor Brian Schweitzer, State of Montana
The Honourable Dennis Schornack, Chairman, US Section, International Joint Commission
The Honourable Herb Gray, Chairman, Canadian Section, International Joint Commission
The Honourable Stephane Dion, Minister of the Environment
The Honourable John van Dongen, Minister of State for Intergovernmental Relations
The Honourable Bill Bennett, Minister of State for Mining
Mr. Garry Alexander, Environmental Assessment Office
Mr. Rich Moy, Chairman, Flathead Basin Commission