



**International Federation of
FLY FISHERS**

Conserving, Restoring, Educating Through Fly Fishing

Great Lakes Council

January 29, 2017

MDEQ Back Forty Comments
Office of Oil, Gas, and Minerals
1504 West Washington Street
Marquette, Mi 49855
DEQ-Mining-Comments@michigan.gov

RE: Opposition to the Back Forty Project

Dear Sir/Madam:

We are writing on behalf of the Great Lakes Council of the International Federation of Fly Fishers. The Great Lakes Council is the voice of fly anglers in Michigan, Indiana and Northwest Ohio. We strongly oppose development of the Back Forty Project proposed by Aquila Mining. An open pit sulfide ore mine has the potential to pollute both the Menominee River and Lake Michigan, destroy a pristine fishery, and place Michigan's citizens at risk. The risks are simply too great to allow a project like this to proceed. Our objections include:

The Risk of Pollution and Damage to the Menominee River, Lake Michigan and the Fishery- Michigan is blessed with the world's greatest supply of fresh water through our Great Lakes and is home to some of the world's iconic rivers and streams. The risks of damaging the river, the local environment, and Lake Michigan are unacceptably high. The sulfide wastes generated by this open pit mine will be difficult to contain and if they leak into the river benthic and aquatic life will be destroyed and Lake Michigan will also be polluted. Also, the mine's wastewater discharges (for which there is still not a permit) are likely to damage the Menominee and its aquatic life.

Moreover, The U.S. Fish and Wildlife Service has been working on the Lake Sturgeon Passage program with the Departments of Natural Resources from

Michigan and Wisconsin and a number of other groups. This \$7,000,000 project will fail if sulfide wastes leak into the river.

Economic Implications- The negative economic impact this project could have on Michigan's recreational economy should be considered. According to the Michigan Department of Natural Resources, anglers spend in excess of \$2 billion a year in trip related expenses and equipment. Moreover, our state's 1.1 million licensed anglers generate \$18 million in revenues in license fees and attract \$11 million in federal funds for fish and habitat conservation. We cannot comprehend why our state leaders would experiment with mines that hold the potential to damage these irreplaceable natural resources and place our sport fishery and tourism industry at risk.

Problems with Permits and the Permitting Process- Concerns have been expressed that the DEQ has violated its own regulations in granting the two permits that have been approved. Critics state that permit applications have been incomplete, contradictory, and that Aquila has made different statements regarding the mine's purposes to different groups. Suffice it to say, there are numerous reasons to suggest that DEQ has not acted in the interests of the citizens of Michigan. Given the state's poor record on water issues, we would expect the highest level of vigilance in regard to this project.

These are just some of the problems associated with this mining proposal. It is time for the DEQ and other Michigan policy makers to step up and represent the interests of Michigan's citizens and the state's invaluable water resources. Stop the development of this mine now.

Most sincerely,

(Signed Electronically)

Dennis O'Brien
President

(Signed Electronically)

David Peterson
Vice President for Conservation