

**January 8, 2018**

Troy Mine, Inc.  
Attn: Doug Stiles General Manager  
Revett Silver Company  
6500 N. Mineral Drive, Suite 200  
Coeur d Alene, ID 83815

RE: Approval of Amendment 006 to Operating Permit 00093

Dear Mr. Stiles:

The Montana Department of Environmental Quality (DEQ) has completed the final environmental assessment for Troy Mine Inc.'s application for a change in the soil laydown depth. The final amendment approval form and determination of significance is attached.

If you have any questions, please call.

Sincerely,



Herb Rolfes  
Operating Permit Section Supervisor  
Hard Rock Mining Bureau  
Department of Environmental Quality  
Phone (406) 444-3841  
Fax (406) 444-1499  
hrolfes@mt.gov

Attachments: Final Amendment Approval and Significance Determination

File: 00093.353

OP\OP\_Revisions&Amendmnts\Troy Mine Inc 00093\2016 Amendment 006\Final Cover Letter

In order to determine whether preparation of an environmental impact statement is necessary, DEQ is required to determine the significance of the impacts associated with the proposed action. The criteria that DEQ is required to consider in making this determination are set forth in ARM 17.4.608 as follows:

1. The severity, duration, geographic extent, and frequency of the occurrence of the impact;
2. The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
3. Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
4. The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources or values;
5. The importance to the state and to society of each environmental resource or value that would be affected;
6. Any precedent that would be set as a result of an impact of the proposed action that would commit the department to future actions with significant impacts or a decision in principle about such future actions; and
7. Potential conflict with local, state, or federal laws, requirements, or formal plans.

The operating permit amendment application submitted by TMI proposed to reduce the final reclamation soil cover depth for the tailing storage facility from the previously approved 18-inch soil cover to an 8-inch soil cover. The tailings storage facility covers approximately 303 acres. Areas adjacent to the tailings facility support mature western hemlock/queencup beadlily forest habitat and mature Douglas fir/pinegrass habitat.

Similar to the establishment of mature forest types under the currently approved 18-inch soil cover, forest vegetation will become established under the proposed action and alternatives in the short-term through seeding, planting and natural regeneration. The forest ecosystem will continue through successional stages over the long term. A local climax forest is expected to develop over the next 150 to 500 years.

Impacts to wildlife will also be the same under the proposed action and considered alternatives as compared to the currently approved 18-inch soil cover. The proposed action and considered alternatives will support forest vegetation diversity similar to off-site areas and consequently support similar wildlife. The forest established on the reclaimed tailings impoundment will eventually reach climax conditions. The approximate 303-acre tailings impoundment site is surrounded by extensive mature forests that will continue to provide climax forest habitat for wildlife. There would be no impacts to grizzly bear, black-backed woodpeckers, common loon, flammulated owls, gray wolves, harlequin ducks or peregrine falcons.