

## **Montana Trout Unlimited's Position on Milltown Dam and its Sediments**

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Montana Trout Unlimited, which represents 3,000 conservation-minded anglers, including about 500 in the Clark Fork drainage, strongly supports removal of Milltown Dam as well as most of the sediments it impounds. This is why:

- Sediment removal is the only genuine way to permanently and effectively eliminate the arsenic that is contaminating local groundwater and the heavy metals that are depressing trout populations in the middle Clark Fork River.
- Without sediment and dam removal, Montanans will be stuck with the inestimable cost of perpetually maintaining the dam, controlling releases of pollutants and dealing with the huge economic and environmental costs if the structure fails.
- Sediment dredging is technically feasible and has been done effectively for decades elsewhere in the nation. Moreover, the short-term impacts of dredging are more than countervailed by the long-term chronic effects of leaving the sediments in place or the risk posed by a catastrophic failure at Milltown.
- Catastrophic failure is a real risk at Milltown. This century-old dam is far more vulnerable to failure than many contemporary engineered structures – including some dams – that failed but which the public was told were safe.
- Milltown Dam provides no flood control benefits, very little recreational benefit when compared to a free-flowing river with a healthy fishery, and its potential power contribution to Montana is a fraction of 1 percent of all the generation capacity that Montana Power sold to Pennsylvania Power and Light. Milltown is not needed to meet Montana's energy needs.
- Removing the sediments from the uncontrolled aquatic environment then placing them in a regulated repository could virtually eliminate the long-term risks of contamination from Milltown Reservoir. Though the sediments are harmful in the reservoir because they are subjected to scouring, leaching and chemical change, these materials, based on the concentrations of metals they contain, are very low hazard when on dry land. In fact, they could legally be placed in the type of solid-waste landfills that exist in communities throughout the nation.
- Unless Milltown Dam is removed, it will continue to be a significant impediment to recovery of the wild and native trout fishery of the Clark Fork River, lower Blackfoot River and possibly lower Bitterroot River. The dam impedes the migration of thousands of fish every year and it has created a reservoir that is

friendly to illegally introduced pike that are depressing trout populations, including rare native species such as bull trout.

- Though constructing fish passage structures around the dam is one option being considered for mitigating the barrier the dam poses for fish migration, the available science indicates it will not work well, if at all, at Milltown. Removal of the dam is the only scientifically defensible alternative. Because the dam is located at the junction of two rivers and fish key in on the subtle chemical signals of water they are familiar with, two fishways will have to be constructed. One for fish migrating up the Clark Fork, and the other for Blackfoot-bound fish. In addition, if upstream passage works – and the effectiveness of large fishways for resident native fish such as bull trout, cutthroats, sucker species and mountain whitefish has never been tested in full – it could be negated by the larger challenges of moving juvenile and adult fish downstream.
- Successful downstream fish passage may be technically infeasible. First, downstream-migrating adults will have to successfully navigate around turbines and predacious pike. Then, downstream-migrating juveniles, which are adapted to moving water, will have to orient themselves in a reservoir environment plus avoid a large predator population. Finally, dam operations will have to be modified to accommodate fish moving over or through the dam or turbines. Downstream passage of juveniles has been attempted at dams on the Columbia for juvenile salmon, and fishery scientists agree it is a technical bottleneck that has yet to be solved. But even if some of the fish figure out how to move up or down fishways, spillways and turbines, as well as through the predator-rich reservoir environment, the cost will be prohibitive. The fishways at Milltown will require water. That will reduce electrical generation. Fishways will also require perpetual maintenance and monitoring. Further, the proposition that the predator population can be controlled through annual drawdowns introduces new costs as well as risks that additional metals will be mobilized. Thus the expense of accommodating fish with expensive technology that is unproven far outweighs the dubious benefits of keeping the dam.