

14 March 2001

Missoula County Commission
200 West Broadway
Missoula, MT 59802

Re: removal of Milltown Dam and sediments

Dear Commissioners:

Montana Trout Unlimited, which represents 2,500 Trout Unlimited members in Montana including around 200 in Missoula County, strongly supports the county's resolution calling for removal of the Milltown Dam and its contaminated sediments. We believe the time is long past to continue the argument of WHETHER the dam and sediments should be removed. Missoula County, county residents, state and federal agencies and Arco should instead be collaborating on HOW TO REMOVE the dam and sediments efficiently, cost-effectively and with minimal disruption.

The reasons for removal are compelling:

- Removing the sediments will eliminate the prime source of arsenic contamination in local groundwater. Arguments that sediment removal could compound contamination are based on an untested hypothesis that fails a reasonableness test when compared to the time-proven approach that pollution is best eliminated when sources are removed.
- Removal will eliminate a source of chronic and acute metals contamination that is suppressing downstream fisheries.
- Dams are not designed to last forever. Dams fail, despite the comforting words of engineers, such as those who not that long ago in 1976 guaranteed the Teton Dam was safe. When it failed, right after filling and after it was built using supposed state-of-the art designs, it killed 11 people and resulted in billions of dollars in property damage. The Milltown dam will continue to require maintenance, including dredging of sediment at some point. The Milltown area will continue to experience ice events, high runoff years, dramatic rain-on-snow events and seismic activity. Milltown Dam will always be at risk of failing.
- Removing the dam will produce near instantaneous improvements in populations of resident fish – including federally listed bull trout -- by eliminating a passage barrier and significantly reducing spawning habitat for highly predacious pike.

Fish trapping and radio telemetry studies indicate dam removal will result in dramatically improved population recruitment as well as critical gene transfer for native species, including bull trout, westslope cutthroats and two sucker species. Also benefiting will be wild rainbow trout, brown trout and native mountain whitefish. Engineered fish passage would be a poor replacement for dam removal. First, only so many fish in a given population successfully use upstream fishways. Literature documenting successful use of fishways around dam by bull and cutthroat trout is scant, and thus we can't count on it working. And second, based on fish passage technology employed elsewhere, it's clear that successfully passing juvenile fish over or around the dam will be difficult, if not near impossible to implement in a reasonably cost-effective fashion. Certainly, state-of-the-art fish passage using elaborate collection technology and overland transfer, even if it were to succeed, could not be justified economically for a dam that produces on average 1.5 megawatts.

- The dam is unnecessary for power production. On average it produces about 1.5 megawatts. It could be upgraded to produce 3 megawatts, but this would be during the time of year when many dams in the region are spilling and producing at a maximum. Moreover, if fishways are employed at the dam, they will require moving water around the dam. Water for fish passage is water not available for turbines. Compare Milltown's 1.5 mw capacity with that of, say, Kerr Dam's 180 mw, or the 700 mw combined of the Cabinet Gorge and Noxon Rapids projects on the lower Clark Fork and it's clear that this facility has little if any role in helping solve Montana's energy challenges.
- Implementation of a post-removal land-use strategy similar to the county's Two River proposal will meet and exceed all the benefits purported by the Bonner Development Group's keep-the-dam-and-contamination proposal. Removal will result in a fishery that is higher in quality and more in demand than the current pike fishery at the reservoir. Removal will result in higher quality wetlands that will produce more biological diversity as well as flood and pollution mitigation services. A post-removal landscape can accommodate recreation trails, river access and riverine recreation, including possibly whitewater boating. The county's proposal also accommodates historical preservation by leaving the powerhouse in place. It's true that dam removal might reduce the tax base for the Bonner School. However, the dam will stay in place until removal activities are complete, thus providing a transition period for tax revenue replacement that is significantly more charitable than what recent Montana Legislatures have provided. Moreover, eliminating contaminants from the community and developing a recreational/historical attraction at the confluence of the Clark Fork and Blackfoot will undoubtedly increase taxable value of local property. In addition, restoration of the river will make the area more attractive for development and attract income from new recreational activities. The construction activities during this time will be a large source of income for local communities.

If EPA decides to leave Milltown Dam and the sediments in place, the agency in effect will transform the confluence of Montana's two largest rivers from an industrial and power-generating site to an authorized hazardous waste facility. Milltown Dam, no longer essential for power production, will become a tailings impoundment and the reservoir an authorized hazardous waste repository. The hazardous wastes will be left in a fashion that continues the current high risk for periodic releases of toxic materials. To our knowledge, EPA has never before authorized a hazardous waste facility in a river, and one in which the state owns the bed and which is located upstream of an urban area.

We think Missoula County deserves better. Montana has an unprecedented opportunity now to remove an environmental liability. We urge the commission to continue to aggressively pursue removal of the dam and sediments.

Sincerely,

Bruce Farling
Executive Director