

# Montana Chapter of the American Fisheries Society

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March 13, 2006

Lincoln Ranger District  
Attn: Mandy Alvino, Resource Specialist  
1569 Highway 200  
Lincoln, MT 59639

Dear Ms. Alvino:

The Montana Chapter of the American Fisheries Society (MCAFS) appreciates the opportunity to comment on the Draft Concept Alternatives Technical Memorandum for the Mike Horse Dam and Tailings Impoundment at the Upper Blackfoot Mining Complex. As an organization of fisheries professionals and students representing multiple agencies, universities, and the private sector across Montana, the MCAFS is extremely interested in the conservation, development, and wise utilization of Montana's fisheries. We applaud the initiative that the USFS and ASARCO has taken in providing removal alternatives for the Mike Horse Dam and impounded tailings, and strongly encourage the implementation of Alternative 5: Total Removal of Dam and Impounded Tailings from Historic Beartrap Creek Floodplain, On-Site and Off-Site Repository Disposal.

In addition to the human health threats that many of the mine-associated contaminants pose, the toxic sediments have the potential to pose chronic and acute effects on aquatic organisms within the Blackfoot River watershed. We are disappointed that the draft alternatives document did not address the impact of the alternatives within the context of the health of the upper Blackfoot's aquatic ecosystem. The original failure of the dam in 1975 resulted in extensive fish kills in the upper Blackfoot, which included populations of native cutthroat trout. Currently, the Upper Blackfoot Mining Complex continues to be a chronic source of contaminants. In light of the recent collaborative efforts by organizations such as Montana Fish, Wildlife, and Parks, the U.S. Fish and Wildlife Service, and Trout Unlimited to restore and preserve the Blackfoot River's coldwater fishery and ecosystem, inappropriate removal of the Mike Horse Dam would jeopardize these efforts.

The opportunity to remove the Mike Horse Dam and Tailings Impoundment should be conducted in a manner that minimizes risk to fish, wildlife, and recreationalists alike. Based on the information presented in the draft alternatives document, there is insufficient evidence to conclude that Alternatives 1-4 will ensure the safety of the upper Blackfoot ecosystem. Alternatives 1 and 2 allow for the continued existence of the dam, which as indicated in the document, is in the process of decay and therefore at risk of failure with geological activity or a

high flow event. Alternatives 3 and 4, the partial removal alternatives, create situations in which Beartrap Creek will be placed either in a controlled channel adjacent to a tailings repository, with moderate monitoring, or in a more natural channel configuration with low levels of monitoring. The dynamic nature of fluvial systems cautions against these alternatives, which allow for mine wastes to remain to some degree within or near the floodplain of Beartrap Creek. In the event of a catastrophic climatic or geologic event, areas of the Blackfoot River downstream of these repositories would be exposed to the stored toxic sediments.

Alternative 5, which supports the total removal of the dam and impounded tailings, is the most acceptable alternative. As stated in the document, this alternative is potentially the most costly in the short term, but it is likely the least costly for long-term monitoring and maintenance. Inasmuch as it provides for the greatest geomorphic stability, restoration of riparian function, and water quality, it is most closely aligned with the interests of MCAFS. In addition, we encourage the USFS and ASARCO to carefully consider the suitability of repository sites so that they do not themselves become point sources of pollution in the future.

In summary, we support your proactive efforts in dealing with the Mike Horse Dam and Tailings Impoundment. We view this as a great opportunity to benefit the fish, wildlife, and recreational resources of the Blackfoot watershed, and urge you to select Alternative 5 to ensure the permanent benefits of these efforts.

Sincerely,

A handwritten signature in cursive script that reads "Clint Muhlfeld". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Clint Muhlfeld  
Past President