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31 January 2016

Montana Natural Resource Damage Claim Program  
1720 9<sup>th</sup> Avenue  
Box 201425  
Helena, MT 59620

Re: BAO restoration plan amendment: Parrot Tailings removal

Folks,

Montana Trout Unlimited generally supports the plan detailed in NRDP's draft Butte Area One Restoration Plan Amendment for removal of the Parrot Tailings. We are fairly convinced removal of as much of this material as is practical will reduce existing and future contamination of Blacktail Creek and Silverbow Creek from metals-enriched groundwater, surface runoff and sediment. We have long believed, as demonstrated by more than 25 years of advocacy for Superfund remedies at the Mill-Willow bypass, Lower Area One, Milltown Reservoir, the Clark Fork River and elsewhere, that source removal is often the first best option for reducing metals contamination in the upper Clark Fork basin.


We support disposal of contaminated materials in the Berkeley Pit because it costs much less (an estimated \$2 million less) than the alternative site, the Butte Mine Waste Repository. It also requires much less traffic disturbance, and, the amount of material that will be disposed of will probably not result in a measurable change in geochemistry in the Pit water, nor significantly affect the timing of when the water level reaches the critical elevation of 5410 feet.

Because this project could be partially funded, it appears, from two sources of restoration funding, \$10 million from the Butte restoration fund, as well as "leftover" funding from the Streamsides Tailings Operable Unit restoration and remediation, we urge NRD and its partners to approach this project with a very sharp pencil. The draft amendment does not include a detailed estimate of costs for most items, such as excavation, transportation, the ET cover systems, replacement of the BSB shop complex, regarding, etc. We recommend that the final decision provide more detail on the ET cover system, including its efficacy and what it will be required for long-term maintenance. We recommend NRD evaluate whether institutional controls will be necessary to ensure this system works in the long term.

At this time it is our hope that additional critical removals in the BAO operable unit, such as the Diggings East, northside tailings and Blacktail berm will be addressed by the remedy now being negotiated for a final consent decree.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bruce Farling". The signature is written in a cursive style with a large, looping "B" and "F".

Bruce Farling  
Executive Director