



P.O. BOX 7792 MISSOULA, MT 59807 (406) 241-3121
www.hellgatehuntersandanglers.org

November 24, 2021

Smurfit Assessment Plan Comments
Attn: Mr. Brian Bartkowiak
Montana Natural Resource Damage Program
PO Box 201425
Helena, MT 59620-1425
NRDP@mt.gov

Re: Comments in Support of NRDP's Smurfit Stone/Frenchtown Mill Site Assessment Plan.
Dear Natural Resource Damage Program,

Hellgate Hunters & Anglers (HHA) is a local, all volunteer rod and gun club based in Missoula. We represent over 400 local hunters and anglers and appreciate the opportunity to provide input on NRDP's Assessment Plan for the former Smurfit Stone Mill Site. Our members routinely wade, float, hunt and fish the Clark Fork River both upstream and downstream of the Smurfit-Stone site near Missoula. We have a vested interest in protecting the publicly-owned natural resources and wildlife in this area. As such, HHA would like to express our full support for NRDP's assessment plan to fully evaluate the site's impacts to our local environment, including the fishery in the Clark Fork.

Local sportsmen and women have long been engaged in issues related to Smurfit Stone, primarily due to the site's history of negative impacts to the Clark Fork and its fishery. In fact, less than a year after the mill opened in 1957, wastewater releases from the Site into the Clark Fork killed all fish in the river for more than 25 miles downstream. Local sportsmen were outraged, but thanks to the dogged efforts of anglers, conservationists and other local stakeholders, the mill's wastewater operations gradually improved over time.

Nonetheless, after the mill closed in 2010, it became apparent that site's 60+ years of waste disposal on the floodplain, banks and waters of the Clark Fork had taken a serious toll. In 2013, 2018 and 2019, Montana FWP collected trout and pike samples from the Clark Fork stretch below the mill and found elevated levels of dioxins, furans and PCBs: all dangerous toxins and all associated with pulp and paper mill industry. FWP's discovery prompted a do-not-eat advisory for northern pike and rainbow trout that now stretches from the Bitterroot/Clark Fork confluence all the way to the Flathead River. Yet, the EPA continues to downplay or ignore the connection between the site's buried wastes and the Clark Fork River fishery and has resisted calls for more data collection. This is unacceptable.

Through NRDP's assessment plan, the Trustees have formulated a plan to use existing and newly collected data to fill information gaps and adequately characterize injuries to public-owned water resources and wildlife. HHA supports NRDP's plans to conduct additional investigations and data collection (including additional fish tissue sampling) to better assess exposure pathways between contamination at the site and fish and other wildlife such as osprey.

In short, local anglers deserve to know if they can ever trust to eat the fish in the Clark Fork. Moreover, we deserve to know how the Smurfit site is or is not contributing to the problem. Now is the time for a thorough investigation of the site's impacts on fish, wildlife and other aquatic life. If the evidence shows that the site's buried wastes are leaching into the river, then those wastes should be immediately removed.

Thank you for the opportunity to comment and for your efforts to protect and restore valuable fish and wildlife resources in the Clark Fork River.

Sincerely,

A handwritten signature in black ink, appearing to read 'Walker Conyngham', with a stylized flourish at the end.

Walker Conyngham
President
Hellgate Hunters & Anglers