

Sandy Scherer, Paralegal  
Department of Environmental Quality  
1520 E. Sixth Avenue  
P.O. Box 200901  
Helena, Montana 59620-0901

November 10, 2020

Re: Selenium Standards for Lake Koocanusa & Kootenai River Rulemaking

Dear Ms. Scherer,

The Montana Wildlife Federation, Flathead Wildlife Inc. and Hellgate Hunters and Anglers are pleased to offer comments on the proposed site-specific selenium standards for Lake Koocanusa and the Kootenai River. Collectively, our three organizations represent hundreds of anglers who enjoy fishing these two popular water bodies and work to protect fish and aquatic habitat there and on other lakes and rivers throughout Northwest Montana. We appreciate the opportunity to weigh in on this important issue.

Lake Koocanusa and the Kootenai River contain highly valued sport-fisheries such as rainbow trout and kokanee salmon, which support tens-of-thousands of angler-days each year. Ongoing selenium pollution represents a major long-term threat to these prized fisheries as well as water quality and beneficial uses. In addition, Lake Koocanusa supports the largest bull trout population in Montana which relies on the Kootenai drainage and the Elk River for spawning habitat. Native burbot are also found in Lake Koocanusa and the Kootenai River, this potential Species of Special Concern has declined greatly over the last few decades. The Kootenai River downstream of Libby Dam also provides habitat for sensitive species such as bull trout and white sturgeon, both ESA listed species.

Selenium is a toxic pollutant that greatly affects fish species, causing deformities, harm to reproductive systems, reduced growth, and winter stress syndrome in juvenile fish. Selenium can also cause major effects across food webs. Transboundary selenium pollution is a growing issue in Montana waters and will have the potential to negatively impact both water quality and aquatic life.

Historic and current mining operations in the Elk River valley of British Columbia contributes 95% of the selenium to Lake Koocanusa. Selenium concentrations measured in the Elk River have been consistently rising over time and there are plans for current expansions and creation of four new mines that are currently going through an environmental assessment process. These new mines would potentially result in increased selenium concentrations in the Elk River and downstream waters.

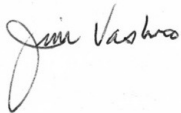
The current standard for dissolved selenium is 5 micrograms/liter, a standard based on the EPA's 1987 Ambient Water Quality Criteria. This current standard is not protective of Montana's water quality or aquatic life. The selenium standards being proposed by Montana DEQ for Lake Koocanusa and the Kootenai River are the result of years of collaboration between DEQ, BC Ministry of Environment, scientists, Indian Tribes and local stakeholders. These standards have been developed using the scientific expertise of the selenium Technical Subcommittee which has determined that a level of 0.6 to 1.0 micrograms/liter is an appropriate level to protect aquatic life in Lake Koocanusa. The proposed standard of 0.8 micrograms/liter fits within that range. Furthermore, the recommended standard of 3.1 micrograms/liter for the Kootenai River is based on the EPA's recommended national criteria.

Montana Wildlife Federation, Flathead Wildlife Inc. and Hellgate Hunters and Anglers support the proposed standards, including the standards for fish tissue (egg/ovary, muscle, whole body). We would also like to commend Montana DEQ for working to provide a collaborative and transparent process to determine these standards, including adequate public participation for the last five years. Adopting these standards now will protect Montana's water quality, aquatic life and local economies from the negative impacts of mining pollution originating in British Columbia.

Sincerely,



Frank Szollosi, Executive Director  
Montana Wildlife Federation



Jim Vashro, President  
Flathead Wildlife Inc.



Walker Conyngham  
Hellgate Hunters and Anglers