



Sacajawea Audubon Society

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December 9, 2016

Mr. Joe Vranka, Unit Superfund Manager
Federal Building
10 West 15th Street
Suite 3200
Helena, MT 59626

Dear Mr. Vranka.

We are providing this letter on behalf of the Sacajawea Audubon Society, headquartered in Bozeman, Montana. Our members are located throughout southwestern Montana. We understand that you are EPA's Unit Superfund manager and that the Berkeley Pit site is in your management area.

We were very saddened to learn of the deaths of many thousands of snow geese due to recent exposure to the toxic water in the Berkeley Pit operated by Montana Resources under the regulatory jurisdiction of US EPA. Our concern is due to several environmental effects listed below that are occurring due to the inadequacy of the current bird hazing program being implemented at the site.

- illness and mortality of birds exposed to the pit water, including seasonal migratory waterfowl and local birds
- subsequent contamination of scavenger birds and mammals that eat the sick and the dead birds exposed to the pit water
- potential that hunters during the 2016 and future waterfowl hunting season could shoot and consume a contaminated bird that was exposed to the pit water

Due to the acidic and highly mineralized pit water chemistry, the water surface stays clear of ice later into the winter than local ponds and lakes. This makes the pit water an attractive place for migrating waterfowl and local birds, thereby increasing risk of exposure.

Based on recent events it seems that EPA must conclude that the current bird hazing protocols that are in place at the pit are not effective and need to be replaced with a structural barrier to prevent future incidences like this. It is not feasible for any bird hazing program to be effective for all seasons, bird migration patterns, and local bird water needs. We question whether any bird hazing and monitoring program is capable of being effective 24 hours/day for every day of the year. It is likely that migrating and local birds are landing at the pit for water during daylight and night hours, including times that the bird hazing program is ineffective. It is apparent that global climate change is causing bird migration patterns to change, which could bring more birds to the Berkeley Pit area.

Structural barrier options that should be considered include, but are not limited to, a suspended net over the pit to prevent birds from attempting to land and/or a floating cover over the pit to prevent water contact. Use of a structural barrier would mean that we would not have to rely on the effectiveness of a clearly inadequate bird hazing program. We realize that the pit water surface is quite large, covering an area of approximately a square mile. This means that these options will be quite expensive. However, the cost is justified in order to prevent a recurrence of this massive bird kill, subsequent contamination of scavenger birds and mammals, and possible consumption of contaminated birds by waterfowl hunters.

Thanks for your consideration

Sincerely,

Loreene Reid
President
Sacajawea Audubon Society