

Dear editor,

I would like to respond to your article '*Recent data spell trouble for Koocanusa Fish*' that inaccurately suggests there is a risk to fish populations in Koocanusa Reservoir. The data referenced in the article is misleading. Here's why.

The U.S. EPA recommends selenium levels be measured in three ways: from whole body tissue, from muscle tissue, or from eggs/ovary tissue. For eggs/ovaries the U.S. EPA and the U.S. Geological Survey (USGS) require that fish eggs/ovaries be sampled when the fish is spawning and only from gravid (full of eggs) fish or ripe ovaries.

While the recent article refers solely to egg/ovary data, none of that data was collected from spawning fish or from gravid or ripe ovaries. During testimony before a special committee of the Montana Legislature, Montana Department of Fish, Wildlife and Parks (FWP) confirmed that it "*never had a gravid fish.*" Further, the US Geological Survey testified that the egg/ovary data was not representative of what was going on in the lake, was not useable and not reliable.

The two other forms of data (whole body and muscle data) are usable and reliable and confirm that selenium levels found in Koocanusa are safe and have been safe for as long as data has been collected. Further, Montana FWP has confirmed that it has seen no fish population declines in Koocanusa, and that it has no evidence of deformities, due to selenium.

Finally, selenium concentrations in Koocanusa Reservoir have not been increasing. Rather, as [presented by DEQ](#) during the standard-setting process, selenium water concentrations in Koocanusa have been stable since at least 2012. Teck now has three water treatment facilities removing about 95% of selenium from treated water and water quality is improving.

We invite you to review, for yourself, the data and requirements for selenium in Koocanusa Reservoir and draw your own conclusions. Information can be found at the following websites:

- [DEQ's new selenium standard](#) (for the new selenium standard go to ARM 17.30.632(6))
- [DEQ's "Derivation of a Site-Specific Water Column Selenium Standard for Lake Koocanusa"](#)
- [Montana Legislature special committee testimony](#)
- [For documents related to the legislative special committee](#)
- [EPA's Water Quality Portal Lake Koocanusa data](#)
- [Fish consumption guidelines](#)
- [Teck's Elk Valley Water Quality Plan](#)

Regards



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