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22 September 2015

Bruce Rich, Administrator
Fishery Division
Montana FWP
1620 East 11th Avenue
Helena, MT 59620

Re: EA on proposed Washoe Park isolation facility

Dear Bruce:

Montana Trout Unlimited has reviewed the checklist EA prepared for the proposed Washoe Park isolation facility in Anaconda. We oppose the project on a number of grounds, and in this case specifically because the EA does not disclose or evaluate all the actions being taken nor all the decisions FWP is making related to this proposed facility. Further, the EA is faulty because it does not disclose all the costs that will be incurred, nor does it provide a detailed comparison of the benefits and drawbacks of the current program for producing eyed eggs for westslope cutthroat restoration versus a new program to be established at the Washoe Hatchery.

Specifically:

P. 1. FWP says the purpose of the EA is to evaluate the construction of a new building at the Washoe Hatchery. And that's it. It cites authority for hatchery construction and management under MCA 87-3-201. However, this project entails much more than construction of a building. It also involves FWP abandonment of an existing, efficient and successful private-public facility on the east side of the Continental Divide in the Upper Missouri River Basin, where the restoration projects occur. That facility at the Sun Ranch has well served westslope cutthroat restoration needs. The EA completely ignores the impacts – environmental and financial – related to FWP halting use of this facility and the public-private partnership behind it. Our attorneys advise us that FWP is obligated under MEPA to evaluate potential impacts behind discontinuance of the Sun Ranch hatchery. No mention is made in the checklist EA of the fate of the current captive brood, the result of years of public and private investment, at the Sun Ranch facility, nor what the egg source will be at the Washoe facility. Other issues are left unaddressed, including how the impacts of coldwater disease, which has occurred at the Washoe Hatchery, will be avoided in the new isolation facility. Montana TU recognizes that the Hatchery Bureau has a role in cutthroat restoration. And we have few quibbles with the abilities of hatchery division staff. However, it is not the role of the Hatchery Division to lead westslope cutthroat restoration in Montana. As we have strongly suggested to FWP in the past, any EA justifying FWP abandonment of the Sun Ranch facility should include a detailed analysis from the technical group – including FWP's geneticist, fish health specialist and field biologists as well as

outside experts – who have previously advised the department to ensure scientifically rigorous cutthroat reintroduction efforts.

P. 2. In justifying the new facility, FWP says, “*additional rearing space is required to meet the growing demand for drainage specific eyed eggs and fry.*” Nowhere in the EA does FWP detail this “growing demand” and exactly why the Sun Ranch facility cannot meet it. Further, it is our understanding FWP and partner agencies no longer use fry in restoration efforts because it has proven to be unreliable. Attached is the report from Buddy Drake summarizing the 2015 program at the Sun Ranch project. It validates our contention that there is still additional capacity for more eggs at the facility. The full capacity has never been utilized by FWP or other agencies. FWP needs to detail what projects are in the pipeline or approved that lead to the determination that capacity at the Sun Ranch facility is unsatisfactory.

P. 2. FWP claims that the Washoe facility will result in a “*...significant reduction in cost of rearing eggs and fry for conservation purposes when compared to the current contract.*” This claim is totally unsubstantiated. Nowhere in the EA does FWP detail the comparison. Again, unless FWP has determined otherwise without telling its partners, raising fry is not relevant. The attached Sun Ranch report identifies FWP’s current costs for use of that facility: \$10,000/year of a project that costs \$36,500/year. By pulling out of the Sun Ranch project, FWP is leaving \$26,500 in annual contributions from partners on the table. If FWP abandons the Sun Ranch project, it then takes on a \$149,000 capital expenditure along with a still-to-be- identified annual cost for staffing, power, water and sewer services at the Washoe facility. We are having a hard time comprehending how the proposed project could possibly be a cost savings from the current situation. It is not evaluated in the EA. It should be.

P. 2. The EA states the estimated cost of constructing the new facility will be \$149,000 and it will come from “*Fishery Mitigation Trust (verify with Eileen) Funds.*” We’re not sure what this means.

P. 12. The EA states that, “*Existing FWP hatcheries cannot accommodate the growing demands for wild egg and fry rearing capabilities with biosecurity standards.*” Again, FWP has not specified what those “*growing demands*” are. FWP has not demonstrated the existing private-public facility at Sun Ranch is not up to the task. Sun Ranch has produced eggs in a facility that has proven to be biosecure (though perhaps not to standardized criteria for some commercial or FWP hatcheries), and it has produced eyed eggs successfully for every project FWP, Turner Enterprises, the U.S. Forest Service and the U.S. Park Service have approached it for – with additional capacity still available. Basically, FWP has not identified exactly what is broken that must be fixed by taking on an expensive new isolation facility with still-to-be-identified annual costs.

P. 12. Again, without a shred of evidence, comparative analysis or an evaluation of the opportunity costs of spending \$149,000 for the isolation facility, FWP states that building the Washoe facility will ensure “*the cost to FWP will be substantially lower than the current contract.*”

P. 13. Under agencies and organizations consulted in preparation of the EA, FWP does not list a single funding or project partner involved in the Sun Ranch project, which includes

NorthWestern Energy, U.S. Park Service, U.S. Forest Service, the BLM and Turner Enterprises and non-profit organizations including the Madison River Foundation, Montana Trout Unlimited and a number of its chapters. In fact, though Montana Trout Unlimited and the Madison-Gallatin Chapter of TU invested \$40,000 in improvements at the Sun Ranch – at the urging of FWP – we were never consulted before FWP decided to abandon this investment.

As we have stated before, if FWP can get consensus from the technical committee that the agency has convened in the past for reviewing cutthroat conservation and restoration in the state that abandoning the Sun Ranch facility and constructing an isolation facility in Washoe Park is necessary, Montana TU would be open to the switch. However, the agency must also be much more transparent and complete in its comparison of costs, risks and benefits of moving from the Sun Ranch to the Washoe hatchery.

It is also worth noting that we, as are others, are completely surprised that FWP can find \$149,000 for a capital project with unidentified operational costs only months after we and other organizations were told the agency was strapped. Montana TU believed the agency pleads that it was nearly underwater, and subsequently worked hard in the Montana Legislature to ensure FWP's request for a license fee increase was approved.

Montana TU recommends FWP redo the EA and include a complete analysis that discloses the costs and benefits of abandoning the Sun Ranch facility, better justifies construction of a new facility in Anaconda and that it involve consultation with the cutthroat conservation technical team and the agency's partners in cutthroat restoration efforts. We also request that the agency ensure the Montana FWP Commission buys off on any major departure in the westslope cutthroat recovery plan that involves a significant capital investment of FWP funds.

We look forward to our comments being reflected in a final decision.

Sincerely,



Bruce Farling
Executive Director

cc.
Director Hagener
FWP Commission Chairman Vermillion
Deputy Director Volesky
Madison-Gallatin Chapter of TU
Angela Smith

Enc.
2015 Sun Ranch report