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23 April 2011

Jim Olsen
Montana FWP
1820 Meadowlark Lane
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Re: Cherry, McVey, Dyce Creek cutthroat projects

Jim:

Thanks for the opportunity to comment on three projects FWP is proposing -- at Cherry, McVey and Dyce Creeks -- that aim to secure and restore populations of westslope cutthroat trout in Southwest Montana.

Montana TU supports all three projects, and we are happy to contribute financially to the Cherry Creek project. However, we have a few comments and questions related to these projects.

**Dyce Creek**

The Dyce Creek watershed has historically been grazed heavily, and its riparian condition and channel integrity as a result have been recognized as at-risk. The EA states that the BLM has modified its allotment planning to a three-pasture system, which the agency says is an improvement. But the EA doesn't provide any quantitative or qualitative information indicating that the riparian conditions, channel integrity and water quality is improving. The EA also states that the new forest plan for the Beaverhead-Deerlodge National Forest grants the agency more authority to correct deficient grazing management. We agree the new plan has improved tools. However, the EA doesn't state whether the forest has indeed increased monitoring, as well as modified, allotment management affecting Dyce Creek. We raise these issues because of our long-standing concern that investments in native fish restoration be protected with land management that is consistent with maintaining healthy habitat.

Page 4 of the EA states that "prior to treatment, genetically pure WCT occupying the lower reach of the East Fork would be captured with electrofishing and held

upstream of the treatment area." Because hybridized westslope cutthroats also occupy the drainage below the existing barrier on the East Fork, how will FWP know with any certainty that captured fish that are moved upstream are genetically unaltered? It seems that by using only ocular detection, it is possible FWP could unwittingly move some hybrids into the reach where it will also introduce genetically pure fish.

Page 16 of the EA indicates that Rotenone treatment in Dyce Creek could occur as early as July, and thus potentially impact some amphibians in the larval stage. Page 17, however, says the proposed treatment will be a "date in late August." We recommend treatment occur as late as possible in order to reduce impacts to amphibians.

**McVey Creek**

Like the Dyce Creek project, we support the venture proposed for McVey Creek. We note that one of the advantages to this project is also one of its disadvantages. Taking advantage of the existing culvert with the addition of a drop structure as a barrier is cost-effective. The cost-effectiveness also benefits from easy access. However, the ease of access also increases the risk of someone moving non-native fish above the barrier. Further, reducing available habitat for longnose and white suckers, as well as native burbot is a drawback. Finally, construction of a complete barrier forecloses the option of McVey Creek being occupied at some point by fluvial grayling. Still, on balance, because of the dire condition of westslope cutthroat populations in the upper Missouri River basin, and the limited opportunities available for securing existing populations or reintroducing new ones, this project merits public support. One benefit to this project is that it includes headwaters that are high enough in elevation that, if the project is successful, it could provide important refugia for cutthroats as the climate shifts.

Though we believe the risk is very low that an effective concentration of piscicide could drift below the buffer downstream of the treated reach, we recommend FWP provide extra caution to its monitoring and neutralization efforts on the lower end of McVey Creek. Though we believe dilution and oxidation would neutralize the piscicide if it were to reach the Big Hole, FWP's ability to gain public acceptance for similar projects will be enhanced if it can demonstrate its quality control/assurance for the treatment is right on the mark.

**Cherry Creek**

Again, we enthusiastically support this project because it restores westslope cutthroats to more than 10 miles of connected stream habitat and two lakes. Further, a successful project here could result in a large enough population that could be used as a source for fish or gammetes for "near-neighbor" projects elsewhere in the Big Hole drainage. Further, the barrier location appears to be very good for long-term effectiveness and stability.

We are pleased to be able to support these projects because of the potential they pose for restoring westslope cutthroats in the Big Hole and Beaverhead drainages. All the methods are proven, and FWP's very positive record in pulling off these types of projects elsewhere indicates the potential for success and public acceptance is high.

Sincerely,

Bruce Farling
Executive Director

cc. George Grant Chapter TU
Lewis and Clark Chapter TU