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29 November 2005

Todd Koel, Supervisory Fishery Biologist
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P.O. Box 168
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Re: scoping comments on Specimen Creek Project

Todd:

Montana Trout Unlimited supports the proposal to implement a restoration project in the Specimen Creek drainage of Yellowstone National Park. As we've discussed previously, we like to discuss further how TU – Montana TU and perhaps TU National – might be able to partner on the project in planning, implementation and raising of needed funding and other resources. TU already has an MOU with the Park to facilitate this type of arrangement, and we've had a few stuttering but yet to be fulfilled opportunities to apply it to native fish restoration. This could be the project.

We like the project as conceived because it appears the setting of High Lake, the forks of Specimen Creek and main Specimen Creek might lend themselves technically to removal using chemicals, barrier installation and reintroduction of WSCT. That said, we know it won't be easy or cheap. We are especially intrigued by the project because it has the potential to create 18 miles of connected habitat for WSCT, which is a significant chunk of stream length and which, in theory, could contain enough fish and enough habitat to give this species a pretty good opportunity to persist indefinitely in the face of potential stochastic events (well, aside, perhaps, from a full-blow eruption of the Yellowstone Caldera). We are further interested in the project because it can occur with minimal disturbance of existing angling and hiking use, both which, based on Park data, appear to be low in the area.

We would need to evaluate the EA before deciding which draft action alternative to support. In that regard, we recommend the Park evaluate High Lake for its potential ecosystem and research value as a fish-less lake. However, absent the opportunity to re-establish unique or important fauna in a restored, fish-less environment, we also don't necessarily have a problem restocking the lake with a self-sustaining population of WSCT. The park will need to weigh the angling value of restocking (and the public support it could bring for the project with the benefits of restoring the lake to its original ecological setting.). We recommend the Park discuss with the State of Montana and the

Montana WSCT Technical Working Group the possibility of using the lake as a potential water for a brood reserve supporting additional WSCT restoration projects throughout the Gallatin (and perhaps Madison) drainage. We don't know if that's technically feasible or whether it's desirable, but it's worth evaluating with the technical group.

We also recommend the Park establish a working agreement, perhaps with an MOU, with the State of Montana and the Sun Ranch, if it plans on tapping the ranch's WSCT propagation facility for help. In fact, this would be an important precursor to finalizing project planning and implementation. The Park can't proceed with removal until it has an idea where the WSCT for the project will come from. And because we agree with the Park that a "nearest neighbor" approach is appropriate, it's probable the Sun Ranch project could play an important role. We'd be happy to facilitate that discussion with the ranch's fishery consultant.

If the Park determines the fish suspected to be 100 percent pure from the Grayling Creek drainage have the highest potential for reintroduction purposes, it is critical that the detail of how these fish can be used be nailed down soon.

We think the one aspect of this project that could determine public acceptance as well as ultimate success is public relations. It's essential Park communications involving the objectives and methods (especially the use of piscicides) are thoughtful, transparent, accurate and understandable to lay people. If you need some help on that, we'd be glad to lend a hand.

Let's discuss more detail this winter and arrange a field trip as soon as practical next year.

Sincerely,

Bruce Farling
Executive Director

cc. Madison-Gallatin Chapter
Idaho Council TU
Wyoming Council TU
Buddy Drake
Scott Bosse
Craig and Jackie Mathews
TU National