

12 August 2010

Chuck Barone, Dillon Unit Forester
Montana DNRC
730 N. Montana Street
Dillon, MT 59725-9424

Re: scoping comments for Pistol Peet Salvage Sale

Dear Mr. Barone:

Montana Trout Unlimited appreciates the opportunity to provide comments to DNRC on the proposed Pistol Peet Salvage Sale in the Centennial Mountain Range. Montana TU is comprised of 3,400 conservation-minded anglers, including hundreds who reside in communities in Southwest Montana.

Montana TU supports and understands DNRC's responsibilities to generate revenue for the state's school trust beneficiaries. We are not opposed to timber harvesting on state lands. We do, however, recognize that DNRC has additional responsibilities to ensure trust lands are managed sustainably and with due deference to water, fish and wildlife.

It appears, based on the limited information we've received, that this proposal will entail some fairly heavy logging as well as use of forest roads. Tentative maps we have seen for the project indicate planned harvest units, as well as existing and new roads are or will be located close to streams in the area, including those tributary to as well as the main stems of Peet, Sand and Bean Creeks. DNRC has a responsibility to ensure this project is consistent with its commitment to help implement fishery conservation plans it is party to. The agency is a signatory (as is Montana TU) to the public-private Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana (2007). This plan has five primary objectives, the first of which is:

"Maintain, secure and/or enhance all cutthroat trout populations designated as conservation populations, especially the genetically pure components."

Maintaining and securing means ensuring, among other things, land-use activities don't reduce local populations. It also means for small, isolate conservation populations of cutthroat trout, that currently unoccupied habitat that is connected, or which could be connected (say, by removing a movement barrier such as a culvert), should not be adversely affected by land use activities, such as through sedimentation, channel modification, hydrological alteration or removal of important riparian cover and sources of large woody debris. Securing small, at-risk conservation populations means leaving options open for expanding occupied habitat.

As such, we recommend DNRC ensure all perennial and intermittent streams within the project area be surveyed for the presence of cutthroat trout. According to information on file in Montana FWP's

MFIS database, Bean Creek holds a population of genetically unaltered westslope cutthroat trout. And thus, land-use activities in this watershed should be done with extreme caution, especially those generating sediment, removing potential cover or woody debris sources as well as involving road crossings. The MFISH database didn't include any information on the Sand or Peet Creek drainages. But that might be just a matter of them never being surveyed.

We recommend DNRC complete a fishery survey of the area, and then work with its own biologists as well as those of FWP to design a transportation network, yarding system and transportation network that will not pose undue risk to water quality, hydrological function and fish. This could mean reducing the amount of harvest – either reducing the number of units or unit size, or modifying prescriptions – and modifying different transportation plans than those we've seen in the scoping material. We recommend any new road constructed for this project indeed be temporary, with its road prism removed, regarded and revegetated after the project is complete.

We also recommend DNRC evaluate the effect canopy removal of the scale being proposed be evaluated for how it will affect timing and size of peak flows. We haven't concluded with any certainty this will be a problem, but it bears evaluation given the amount of vegetation removal being proposed. We further recommend DNRC evaluate the potential for fishery restoration projects in the affected trust land sections, so that when the project is completed there is the potential that the fishery can be improved from the baseline.

We'd be happy to discuss these items further, and we'd certainly be open to touring the project site with DNRC and FWP staff.

Thanks again for the opportunity to comment.

Sincerely,

Bruce Farling
Executive Director