



August 22, 2001

Jim Darling  
Regional Fisheries Manager  
Montana Fish, Wildlife and Parks  
2300 Elmo Drive  
Billings, MT 59105

Dear Jim:

Thank you for sending the EA for the Yellowstone Cutthroat Trout Recovery Project in Bad Canyon Creek. We are pleased to see FWP propose this progressive action to begin reversing the alarming decline of Montana's state fish. Native Yellowstone cutthroat trout have become increasingly rare across their historic range in Montana, and a genetically pure population is indeed a special resource which must be protected and enhanced wherever possible. In fact, once recovered, this YCT population could provide an important genetic reserve and a donor source for YCT restoration in other streams where the species has been completely extirpated.

We feel the EA does a very good job of informing concerned citizens of the need for the project and the full range of expected environmental effects. There is a substantial body of scientific evidence and professional experience which supports the use of rotenone and antimycin in the manner you are proposing to safely remove non-native fish and restore native fisheries with minimal other environmental consequences. One subject which could be strengthened in the EA is the discussion of effects on amphibians. Although the proposed concentrations of antimycin to be applied are not expected to affect amphibians, it would have been better to know which species, if any, occur in the project area. If rare or uncommon amphibians do occur there, special precautions could be taken to insure that no irreversible damage is done. We note that the proposed fall application period should not affect most amphibian larva because they will have already metamorphosed.

Small projects like Bad Canyon Creek YCT Restoration offer an important opportunity for FWP to demonstrate to the public that these chemicals can be used safely and effectively to restore native fisheries. We applaud this effort and hope it will lead to more widespread restoration projects.

Sincerely,

Michael Enk  
President, Montana Chapter AFS

c/o USFS, PO Box 869, Great Falls, MT 59403

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