



March 28, 2000

U.S. Fish and Wildlife Service
Snake River Basin Office
1387 South Vinnell Way, Room 368
Boise, ID 83709

Dear U.S Fish and Wildlife Service:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement and Native Fish Habitat Conservation Plan (HCP) for Plum Creek Timber Lands. The Montana Chapter of the American Fisheries Society is particularly interested in this plan since most of Plum Creek's timber lands are in Montana. We prefer the NFHCP alternative to the No Action alternative, and our comments are offered with the hope that they may strengthen the Plan and help assure that bull trout populations can be recovered and conserved.

Probably our greatest concerns revolve around the issues of implementation and the adaptive management process. In order for the plan to be implemented properly and objectively, the Service needs to be able to commit staff to ensure that the commitments in the HCP are being met and that the bull trout populations are truly being maintained and protected. With respect to the adaptive management process, we feel that the pathway, as described, is cumbersome and impractical. The requirement that statistical significance, biological relevance and causal linkages need to be established before management changes can be made will be difficult to achieve, particularly in drainages with mixed ownership and different land uses. First, it will be hard (if not impossible) to pin down the appropriate level of statistical significance that actually translates into biologically relevant changes. Second, proving causal linkages is virtually impossible if someone wants to take issue with the data. Since we anticipate that Plum Creek will take a conservative approach toward their interpretations of biologically relevant changes and causal linkages, we feel it is necessary to counter balance this tendency by establishing an advisory committee of outside experts to review the CAMPS findings and data and recommend changes as needed.

Other comments are provided below:

1) Tier 1 and Tier 2 lands are "locked in" in terms of their designation for the life of the permit, which is 30 years. Our feeling is that all streams that are tier 1 should remain that way but there

should be an opportunity for tier 2 lands to get converted to tier 1 as additional surveys are conducted. This issue should be revisited every 5 years (about the generation length of a bull trout).

2) The adaptive management approach must have some mechanism for incorporating information that shows changes in bull trout populations. For example, if surveys show bull trout in a particular tier 1 stream to decline in abundance by 90% in 10 years, there needs to be a way for this information to cause change in their management prescriptions.

3) Water yield must be addressed. Of particular concern is the possibility that flood events will cause much more channel erosion in drainages with intensive clear-cutting than in drainages with little or no harvest. These effects will be more profound in unstable streams that have already been compromised in terms of form and function. Therefore, we suggest that Plum Creek develop and implement a quantitative scoring technique for assessing the stability of stream channels (or use an existing scheme such as the "User guide for assessing proper functioning condition and supporting science for lotic areas." Technical Report 1737-15 (USDI, 1998)). All tier 1 streams would be ranked with this or some other method, and if a stream ranks out low, then Plum Creek should commit to less intensive management in that drainage until the score improves. Exactly what form this less intensive management should take is uncertain, but it could involve no clear-cutting or putting a ceiling on the percent of the drainage that can be cut.

4) Bringing old roads up to current BMP standards is a good plan, but what happens when Plum Creek has

finished bringing all their roads up to BMPs and they don't have any more they are willing to reclaim? Will there then be any restrictions on the amount of new roads?

5) Their road improvement schedule is odd (R5). Why does it take Plum Creek 10 years to bring up to standards just 20% of the roads? But then they can get all the remaining 80% done in just 5 years.

6) The BMP list on R3 seems very incomplete. Situations that should be addressed include: 1) drive-through fords, 2) unstable cut and fill slopes, 3) surfacing of wet, muddy roads, and 4) culverts that are in place (even if they meet 50 year floods). These are not mentioned for BMP work. And also, just how will they abandon roads? There is no language about whether they will pull out culverts or leave them in place.

We hope these comments can help improve this HCP, which we generally consider to be a worthwhile and promising endeavor.

Sincerely,

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President, Montana Chapter
American Fisheries Society

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