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Forestry Division
Missoula

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attn HCP
MT DNRC
2705 Spurgin Road
Missoula, MT. 59804

To Whom It May Concern:

As a retired forester who was involved in the very first discussions of an HCP for Montana Lands in the early 90's my fears and concerns have come true. This proposed HCP for Montana Trust lands will only lead to the demise of the very lands they are designed to protect!

Please consider the following comments and concerns.

1. One of the important parts of any plan is the cost of that plan. It is disappointing and concerning that only 1 1/4 pages out of over 1000 pages has been devoted to a discussion of the proposed costs. On Pages 5-17 and 18 there is a verbal discussion but no firm facts. Pages 4-494 and 495 show jobs, wages, and revenues based on the assumption that alternative 2 can be implemented. Past experience has shown that assumptions made in plans such as these grossly overestimate what really can happen on the ground. What steps have been taken to insure that this plan does not have similar results?

2. The decision to have a no harvest zone (50') along all Class I streams will lead to the demise of the very environmental qualities that you are trying to protect. These areas are all aging and many currently at climax stages in their life cycle. Without rejuvenation they will not provide the shade, feed, and cover needed for water quality and quantity, fisheries habitat, and wildlife habitat. Where is the science that justifies this decision?

3. Moderate to high growth rates depend upon good regeneration and proper stocking levels during the sapling and pole stages of development. The requirements on pages 4-371, 4-372, and 4-373 will greatly decrease the growth rates on forest lands. Where is your sustained yield analysis that shows this reduction in growth and thus reduction in income to the "Trust."

4. During the scoping for the earlier EIS. I questioned the costs being used for Implementing the HCP. On page 8-1 an increase of $177,500 is shown over the current program. This is between 2 or 3 additional FTE's without any on the ground costs. Do you have a detailed breakdown of the additional staff hours required? The monitoring alone will take more than 3 staff people! Several years ago it cost $5000 to evaluate ½ mile of road within a Grizzly Bear Management Unit. It must also be remembered that the $177,500 is for a 2 year period or only $88,750 <u>per year</u>

The additional costs of improving road drainage etc is planning to be covered by Future Fisheries dollars and Forest Improvement funds. Both these funds need to be used in many other areas. Conservation District use Future Fisheries funds for stream improvement projects. Forest Improvement dollars must be used for planting and thinning if harvest levels are to remain at current levels.

With the current poor economic times and reduced budgets where will the funds come from for implementation?

5. It appears that review of the HCP has been limited to the "Public", ~~and~~ Montana Fish Wildlife & Parks. (MFWP), and Native American Tribes and other Agencies. Because you are making decision which will have significant economic impacts someone like the Bureau of Economic Research at the University should have been consulted. This is an important step required by the Endangered Species Act that is continually overlooked <u>entirely</u> or given very little consideration. When the original Act was passed by Congress the intent was that the economic impact was to carry as much

importance as management prescriptions. How will you account for the economic impacts?

6. On page 6-32 a distribution list is shown. I retired from F.H. Stoltze Land and Lumber Company in January, 2008. My comments on the Draft and Final EIS/HCP are my own opinion and/or knowledge and do not represent Stoltze.

7. If the HCP is adopted and one-two or more years down the road it results in significant reduction in timber harvest, significant lower income to the trust, or their is catastrophic damage to an area can and will the HCP be changed so that returns to the trust will be similar to todays returns? Will it allow restoration management of an area?

Originally the proposed HCP was to cost $700,000. I am not sure what the current cost is however I have heard it is over $2 MM. One always needs a valid plan however perhaps spending $200,000 on a plan and the remaining $500,000 on on-the-ground action would have resulted in better management of the School Trust Lands.

Thank you for considering my comment and concerns.

Sincerely yours,

Ronald Buentemeier
2225 Dillon Road
Columbia Falls, Mt. 59912