



# AMERICAN FISHERIES SOCIETY

## MONTANA CHAPTER



Water Quality Planning Bureau  
Montana Department of Environmental Quality  
PO Box 200901  
1520 E. 6<sup>th</sup> Avenue  
Helena, MT 59601

March 19, 2009

RE: Draft TMDL plan for middle and lower Big Hole River – comments.

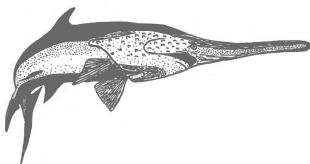
Dear Mr. Yashan,

The Montana Chapter of the American Fisheries Society (MCAFS) appreciates the opportunity to comment on the draft total maximum daily load (TMDL) and water quality restoration plan for the middle and lower Big Hole River watershed.

The American Fisheries Society (AFS), founded in 1870, is the oldest and largest professional society representing fisheries scientists in North America. Our mission is to improve the conservation and sustainability of fishery resources and aquatic ecosystems by advancing fisheries and aquatic science and promoting the development of fisheries professionals. AFS promotes scientific research and enlightened management of resources for optimum use and enjoyment by the public. The MCAFS was chartered in 1967. Our membership is comprised of professional fisheries scientists affiliated with state and federal agencies, universities, tribes and private industry, all dedicated to preserving and enhancing the fisheries resources of Montana. Without a doubt our organization represents the largest collective knowledge base regarding aquatic resources and issues affecting these resources in the state of Montana. Issues that may affect the health of our states aquatic resources, their management and conservation, and their perception and use by the public, such as this TMDL plan for the Big Hole River does, are very important to us.

The Big Hole watershed provides critical habitat to several native aquatic species, including Arctic grayling (*Thymallus arcticus*) and westslope cutthroat trout (*Oncorhynchus clarki lewisi*), which are both listed by the state of Montana as species of concern. Our comments on this plan are founded on our vested interest in the management and integrity of Montana's waters and the conservation of her native species. Thank you for the opportunity to review and comment on this plan.

A significant omission in the draft TMDL plan is that DEQ does not address nutrient impairment of several streams on both the 1996 and 2006 303 (d) lists. On page 22, DEQ states that certain pollutants were not addressed "due to project budget and time constraints." Furthermore, on page 193 DEQ lists several nutrient impaired streams, including Fishtrap, Gold, Charcoal, Sawlog, and Wickiup creeks, and states that these watersheds were not sampled due to the "timeframe of the listings and this project." DEQ dismisses the development of these TMDLs by stating that they will be addressed by future efforts. DEQ similarly postpones the development

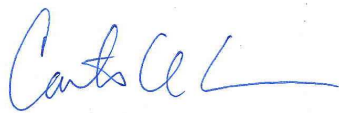


of TMDLs for sediment in Twelvemile and Wickiup creeks. Although an adaptive management approach such as in section 10 is to be commended, the indefinite postponement of TMDLs for pollutants addressed on the 303 (d) lists is not justified.

Similar to the TMDL developed for the upper Big Hole River, this TMDL acknowledges the relationship between dewatering and temperature, and the MCAFS applauds DEQ for addressing dewatering as a cause of thermal loading. Nonetheless, by not addressing temperature in the many dewatered tributaries, this plan is limited in its ability to protect cold water fisheries. Dewatered tributaries act as point sources of thermal loading to the main stem, and the load allocation portion of the TMDL should have reflected these inputs. DEQ uses this approach in identifying watershed scale contributions of sediment, and the same principles apply. Moreover, in the Big Hole River, Arctic grayling, and presumably other fishes, seek thermal refuge in tributaries during summer months, and limiting the analysis of temperature to the main stem and a single tributary ignores seasonal habitat use. Identifying dewatered tributaries with potential to maintain greater flow through cooperative agreements with irrigators would have provided a pragmatic approach to improving water quality, and protecting sensitive species. This sort of analysis could have an important nexus to the restoration and conservation efforts currently underway in the watershed lead by Montana Fish Wildlife and Parks and the Big Hole Watershed Committee, among others.

The draft TMDL and water quality restoration plan for the middle and lower Big Hole River is an improvement over recent plans because it addresses the link between temperature and dewatering. Nonetheless, to address thermal loading effectively, DEQ should have taken a watershed scale approach, as occurs with basin-wide sediment load modeling. Likewise, we are concerned about open ended delays for TMDL development for pollutants because of a lack of resources. Certainly, a large portion of our membership works for state and federal agencies, and we understand limited budgets and time constraints. Still, the indefinite delays present a concern. We appreciate the opportunity to comment on this plan, and look forward to reading the final draft.

Sincerely,



Carter G. Kruse  
President  
Montana Chapter of the American Fisheries Society  
1123 Research Drive  
Bozeman, MT 59718