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Communications  
Bonneville Power Administration, DM-7  
PO Box 12999  
Portland, Oregon 97212

RE: Montana Trout Conservation Project

Dear Colleen Spiering;

This letter provides comments from the Montana Chapter of the American Fisheries Society (MCAFS) in regards to the Westslope Cutthroat Trout Conservation Project in the South Fork Flathead River. The MCAFS is an organization of professional fisheries scientists and students from multiple agencies, universities and the private sector across Montana. One of our objectives is the conservation, development and wise utilization of Montana's fisheries. We are keenly interested in the conservation of the large, interconnected metapopulation of westslope cutthroat trout in the South Fork Flathead River. Therefore the proposed activity to remove non-native species from 21 lakes is an important conservation action on which we would like to comment.

First we would like to make it clear that MCAFS strongly supports the concept of removing non-native species from the South Fork Flathead River basin. We concur that non-native fish (hybridized cutthroat trout) pose a serious threat to the long-term conservation of westslope cutthroat trout. We are pleased that the Bonneville Power Administration, along with Montana Fish, Wildlife & Parks, are willing to take on such a bold conservation action.

MCAFS also concurs that the only viable method to remove non-native species from these 21 lakes is the application of either antimycin or rotenone. While we appreciate that chemical reclamation can be controversial, we think that the risks to non-target species are acceptable and the Montana Fish, Wildlife & Parks has sufficient experience to implement the project. The proposed action implements the chemical reclamation by a variety of means (fixed-wing airplane, helicopter and boats, livestock) based on social and logistical concerns for each lake. This is a commendable approach and it should help reduce the controversy around working in the Bob Marshall Wilderness or the Jewell Basin Hiking Area.

We think it is wise to gradually phase in the plan in order to learn as you go and not exhaust your resources. Doing the most critical lakes first would be wise in case the funding or political situation changes in the future.

There is a strong possibility that chemical reclamation will not be 100% successful the first try.

We urge that monitoring of treated lakes be an integral part of the schedule, and the plan should allow for the possibility of a repeat application. We recommend that this be explained to the public up front so they do not expect a simple one-time fix.

We are uncertain how the length of stream miles to be treated was selected. We presume that some stream length at the lake outlets should be treated to remove hybridized fish but the proposal ranges from 0.10 mile (below Koessler Lake) to 6.10 miles (below Sunburst Lake). Without further information, it seems possible that the downstream treatments could in fact remove genetically pure westslope cutthroat trout. Has an analysis of the distribution of hybrids been completed to avoid impacting wild populations of westslope cutthroat trout in the tributaries?

We are curious as to the plans for restocking the 21 lakes in the project. While it wasn't included in this analysis, we hope that you have considered options in addition to stocking with westslope cutthroat trout from Washoe State hatchery. We recognize the importance of recreational fisheries and support restoration of popular fisheries and the use of M012 westslope cutthroat trout. We also hope other values have been considered. For example: leaving lakes fishless in critical amphibian areas, or restocking nearest neighbor populations of pure westslope cutthroat trout.

Thank you for your interest in conserving westslope cutthroat trout. We look forward to working with the agencies and reviewing the EIS as it is prepared.

Sincerely,  
Patrick Byorth, President  
Montana Chapter American Fisheries Society

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