



AMERICAN FISHERIES SOCIETY MONTANA CHAPTER

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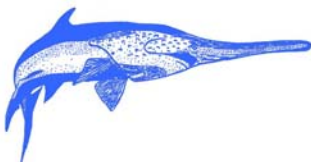
May 6, 2008

Dear Montana Fish, Wildlife and Parks Commissioners,

The Montana Chapter of the American Fisheries Society (MCAFS) would like you to consider the following comments on the South Fork Flathead Watershed Westslope Cutthroat Trout Conservation Program. The MCAFS is an organization of several hundred professional fisheries scientists with a diverse membership from both the private and public sectors. The Chapter has a record of advocating for the unbiased collection of fish resource information; the conservation and restoration of native fishes; the importance of high quality aquatic habitats; and the wise management of land, water, and fish resources in the state of Montana. As such, the Chapter has a strong interest in the South Fork Flathead Watershed Westslope Cutthroat Trout Conservation Program, which represents a comprehensive effort to protect and conserve one of the largest remaining westslope cutthroat trout populations in the nation. The MCAFS has closely followed the South Fork Flathead conservation project for many years and has provided written comment in support of the project on more than one occasion during the federal EIS process. Any delay of the South Fork Flathead River program may greatly reduce the long-term sustainability of one of the last large metapopulations of cutthroat trout in the United States.

The westslope cutthroat trout conservation project was finally initiated after years of evaluation, planning, crew training, research, review, and thoughtful revision that culminated in three affirmative Records of Decision. Given this lengthy review process, we find it very regrettable that the Montana Fish, Wildlife and Parks Commission has agreed to accept additional public comments following a failed motion by a Commissioner to postpone the program. It is our understanding that the Commission will decide whether to go forward with upcoming South Fork projects at their July meeting.

The Chapter strongly supports using the best available science to guide fishery management in Montana. For that reason, the MCAFS strongly opposes unscientific and unsubstantiated opposition to the South Fork Flathead project. Westslope cutthroat trout, the state fish, have undergone widespread declines in distribution and abundance, and many populations in Montana have been extirpated. In recognition of these declines and ongoing threats, the state of Montana currently classifies westslope cutthroat trout as a *Species of Concern*; several other state, federal, and tribal governmental organizations have also recognized the status of westslope cutthroat trout using similar management classifications. In addition, the USFWS recently conducted a status review for potential listing of the fish under the Endangered Species Act; this review



determined that the species does not currently warrant listing, in part because of aggressive mitigation actions underway to conserve and enhance cutthroat trout populations. However, this does not preclude reconsideration of the fish's status in the future.

Montanans have been at the forefront of conservation efforts for westslope cutthroat trout, and the South Fork Flathead River project is a stellar example of those efforts. Another important example of ongoing efforts aimed at addressing declines in the abundance of cutthroat trout in Montana is a Memorandum of Understanding and Conservation Agreement, which was spearheaded by the state of Montana, and recently signed by 18 different agencies and groups, including State (e.g., MFWP, MDEQ, MDNRC), Federal (e.g., USFWS, NRCS, USFS, BLM), Tribal (CS&KT,) agencies and governments, and private (e.g., Trout Unlimited, Montana Stockgrowers, Montana Farm Bureau, American Wildlands, Montana Wildlife Federation) organizations. The signatories' primary objectives in the agreement are to maintain, secure, and enhance conservation populations of cutthroat trout and to provide public outreach, technical information, and administrative assistance. The South Fork Flathead project represents one of the more significant efforts in achieving the objectives of the Montana agreement and is being coordinated and implemented by MFWP, a key signatory in the MOU.

On 1 February 2008 in Kalispell's daily newspaper, the *Daily Interlake*, a commissioner opposed the project because he doesn't believe the public is supportive of the project, because he doesn't believe implementing the plan will eliminate hybridization, and because he doesn't think the quality of the lake fisheries will be the same once westslope cutthroat trout are restored. The MCAFS, MFWP, the Bonneville Power Administration, and the United States Forest Service all agree that all these concerns were carefully considered in a lengthy and comprehensive EIS, which included an extensive public comment process. The outcome of the EIS process, combined with years of planning, research, and comment, is a much improved and revised plan that is responsive to public and technical concerns. The hybridization threats to westslope cutthroat trout are real, and they must be addressed or we will lose this nationally important resource.

The MCAFS understands that the use of piscicides can be an emotional and controversial issue and that there will almost always be opposition to projects that involve fish toxicants. However, our organization of several hundred scientists has extensive experience in the safe and effective use of piscicides, and documentation of the development of robust fisheries following their application. In many locations, there are no alternatives to piscicides for reversing the expanding hybridization threat to westslope cutthroat trout. Delaying the South Fork Flathead River program may undermine the project's effectiveness to protect one of the last large metapopulations of cutthroat trout in the United States.

In conclusion, we urge all members of the Montana Fish, Wildlife and Parks Commission to carefully consider the consequences of voting in opposition of the project. Further delay and inaction would do nothing to reduce or eliminate the very real threats facing westslope cutthroat trout in the South Fork Flathead River drainage. Please help us protect this important native game fish that is in decline by voting for westslope cutthroat trout conservation, not against it, during your July meeting.



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Sincerely,

A handwritten signature in black ink, appearing to read 'D. Schmetterling', with a long horizontal flourish extending to the right.

David Schmetterling, President
Montana Chapter American Fisheries Society



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