



April 27, 2010

Ms. Rose Leach
NEPA Program Manager, CSKT
PO Box 278
Pablo, MT 59855

Dear Ms. Leach,

The Clark Fork Coalition appreciates the opportunity to provide comments on the Flathead Lake Co-Management Plan. The Coalition supports the goals of increasing native trout populations and decreasing lake trout in Flathead Lake, one of the most treasured lakes in the Clark Fork watershed and one of the most pristine lakes in the world. We urge the Confederated Salish and Kootenai Tribes (CSKT) and Montana Fish Wildlife and Parks (FWP) to expand their management plan to include more aggressive lake trout suppression tools in order to restore bull trout and westslope cutthroat trout in Flathead Lake.

The Clark Fork Coalition was founded in 1985 to protect and restore the 22,000 square-mile Clark Fork River watershed. Our 1,500 members are united behind a vision that looks toward the day when:

- The Clark Fork basin's waterways flows with fresh, clean water and sustain a revitalized trout fishery, a resilient aquatic environment, connected corridors for wildlife, and healthy human communities.
- The basin's residents use and interact with the Clark Fork, and appreciate that the river and its lakes and tributaries shape and sustain every part of our lives: our landscape, our livelihoods, and our culture.
- Riverside communities regard the waters of the Clark Fork basin as an irreplaceable asset and an economic driver, and make its care and protection a top priority.

The Flathead River watershed, including Flathead Lake, is the largest tributary to the Clark Fork River. The natural resources in the Flathead Valley provide vital economic benefits and ecological services for Montana as well as the entire Northern Rockies and Cascadia ecosystems. The Flathead's headwaters and rivers supply clean, cold water to Flathead Lake, and provide drinking water for thousands of residents. Plus, the streams, rivers and lakes in the Flathead basin offer unparalleled recreational opportunities that infuse

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millions of dollars into local communities. For instance, the scenic North Fork and Middle Fork rivers of the Flathead support over 40,000 angler days each year, and are nationally recognized for providing a high-quality, native trout recreational fishery.

That's why it's disappointing that the meager native trout populations in Flathead Lake aren't on par with the other natural assets in this unique watershed. While the majority of recreational angling in Flathead Lake—at about 50,000 angler days a year—is focused on lake trout currently, we are hopeful that someday bull trout can be restored to levels that allow people to once again catch these celebrated native fish.

The Coalition believes that the Co-Management Plan offers an opportunity for the CSKT and FWP to proactively address the imbalance in Flathead Lake's fishery by significantly ramping up efforts to suppress lake trout and restore native trout populations. We recommend undertaking the following actions:

1. **Set a target for true bull trout recovery.** The Coalition encourages the CSKT and FWP to ensure this Plan restores bull trout to population levels found in the 1980s, before the collapse of kokanee salmon and the discovery of *Mysis* shrimp.
2. **Suppress the adult lake trout population to 50% of current population levels by launching sustained gillnetting and live trapping programs.** It's critical to suppress lake trout at a much faster rate than we've seen in the past decade under the current management plan. One important factor is to ensure that the removal rate exceeds the lake trout recruitment rate (estimated at 25%). Flathead Lake would still have a robust population of lake trout—and easily sustain a thriving recreational lake trout fishery—even if the current population is reduced by 50%. Gillnetting and live trapping can be conducted to minimize bycatch of native trout, and are scientifically proven to be effective means of lowering the number of nonnative trout to restore native trout numbers.
3. **Explore the potential for a commercial lake trout fishery, and offer incentives like bounties and contests for increased recreational angling of lake trout.** Angling has been a successful community-supported method for lake trout removal, and is a good tool in concert with more aggressive approaches to suppression. These incentives will also help restore bull trout by providing invaluable opportunities to continue and expand public educational efforts on threats facing native trout. We also encourage the CSKT and FWP to continue the free donations of protein-rich lake trout to local food banks with appropriate mercury warnings.

4. **Eliminate the slot limit for lake trout.** Larger adult lake trout eat bull trout, which means the current restriction on catching large lake trout is counter-productive to the goal of the Co-Management Plan to: “Increase and protect native trout populations (bull trout and westslope cutthroat trout).”
5. **Maintain the suppression program for at least 5 years and up to 10 years, and closely monitor bull trout populations for 10 years.** It will take 5-6 years to see any real impact of lake trout suppression actions on native fish numbers due to the migratory interval between juvenile bull trout leaving the lake and returning to spawn. We strongly urge the CSKT and FWP to use an adaptive and flexible approach to manage trout populations in the lake over the next decade. And, for the most effective adaptive management strategy, it’s critical to accurately and consistently measure the impacts of each management action on the lake’s and rivers’ fisheries to the best of both agencies’ abilities.

The Coalition applauds the CSKT and FWP for working cooperatively to protect and restore native trout in Flathead Lake, one of the Clark Fork watershed’s most treasured resources. Thank you for considering our recommendations. Please feel free to contact us with any questions regarding these comments.

Respectfully,



Brianna Randall
Water Policy Director