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RE: Montana Trout Unlimited / Flathead Valley Trout Unlimited comments for the Flathead Lake and River Fisheries Co-management Plan Pilot Project NEPA process.

Dear Barry and Bruce,

Thank you for moving forward with the NEPA process to determine a preferred alternative for the Flathead Lake and River Fisheries Co-management Plan Pilot Project. Montana Trout Unlimited and its Flathead Valley Chapter support a preferred alternative that results in **measurable** recovery results for native bull trout and westslope cutthroat in the Flathead Basin, including Flathead Lake and the Middle and North Forks and their tributaries, as well as the main stem of the Flathead River. Selection of an alternative for the pilot project should meet these objectives:

1. It should answer the question: What is the appropriate population level and population structure for lake trout in Flathead Lake in order to recover bull trout and westslope cutthroat trout to population levels and distributions mimicking those present during the 1980s?
2. It should be based on the best science available.
3. It should be clear about what actions and impacts are reversible and which are not reversible.
4. It should be unequivocally embraced by both partners in the co-management plan.

Montana Trout Unlimited and its Flathead Valley Chapter support a preferred alternative that would include the following elements.

1. A reduction rate of age 3+ or 4+ lake trout of no less than 50 percent and perhaps up to 75 percent of the current estimated populations. This is within the range of the modeling that has been shown to overcome a compensatory effect of increased lake trout recruitment. The remaining lake trout population in Flathead Lake will still produce a good lake trout fishery, and probably one that includes more fish in good condition with higher growth rates than is currently the case.
2. A rate of annual removal that is adaptive in nature and which the ID team concludes is necessary to meet the target for measurable bull trout recovery at the end of the pilot project. We recommend, however, the ID team examine a couple of approaches: 1.) achieving most of the reduction in the first couple of years, with another large reduction effort in years 5-6 to reduce fish from the expected recruitment bubble generated after the first years of the suppression effort; or, 2.) taking a more incremental approach, annually increasing the exploitation rate over time.
3. We support supplementing current angling measures with gillnetting, and trapping, if a method using the latter is deemed to be effective by the ID Team. Though we are dubious about the value of bounty programs, we urge the ID team to explore those options.
4. We support a pilot project that would last at least 10 years, to include the potential of measuring spawning from several bull trout year classes born during the suppression period. This approach is consistent with objectives stated in the State of Montana Bull Trout Restoration Plan¹ signed by Montana FWP. It calls for evaluating three age-classes (15 years). A 10-year project will by necessity include years where suppression is the primary focus, and then years where monitoring the response in native fish populations are the focus.
5. We support the measurement of some combination of the following metrics, if helpful, in order to judge success: redd counts on index reaches in the Middle and North Forks; juvenile bull trout counts; gillnet samples in the lake; lake trout stomach samples; cutthroat population estimates in the Middle and North Forks of the Flathead River: and possibly angler success rates or a similar metric for native fish in the river. We ask that the agencies judge success by finding a positive response in at least two of the selected metrics, or another number acceptable to the ID team. If the criterion is only bull trout redd counts in index reaches, we ask that the pilot be continued until there is a statistically valid determination that the project is working or not. That, in our estimation, would necessitate no less than an 8-10-year project.
6. We recommend the ID team ensure that the pilot project helps achieve objectives identified in the State of Montana Memorandum of Understanding and Conservation Plan for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana (2007). This plan was developed and signed by 23 public and state agencies, Indian tribes and private entities, including Montana FWP, the Confederated Salish-Kootenai Tribes, the Montana Chapter of the American Fisheries Society, and Montana Trout Unlimited. The primary objective identified in this plan is to “Maintain, secure, and/or enhance all cutthroat trout populations designated as conservation populations, especially the genetically pure components.” The cutthroat trout populations of Flathead Lake and the Main, Middle and North Forks have been identified as conservation populations, and thereby are deemed deserving of being maintained, secured or enhanced.

¹ MT Bull Trout Restoration Plan Appendix D. Summary of restoration goals for Bull Trout RCAs in Montana: FLATHEAD

- Increase bull trout spawners to attain the average redd count level of the 1980's, and maintain this level for 15 years (3 generations) in the North Fork and Middle Fork monitoring areas.
- Provide a long-term stable or increasing trend in overall population.

7. We encourage the ID team to monitor results and methods from lake trout suppression efforts elsewhere in the region, such as at Lake Pend Oreille, Swan Lake, and Yellowstone Lake. The results of removal efforts there could shed important inferences for projecting results related to removal efforts at Flathead Lake.
8. We support the monitoring of other biological signals, such as mysis shrimp densities, prime productivity in the lake, and perhaps some sort of water quality measure like clarity (the latter will provide some insights on how removal of lake trout affects organisms farther down the trophic ladder, and how they in turn might create new impacts or fishery benefits).
9. We support identification by the ID team of angling pressure objectives. Currently there are 40,000 – 70,000 angler-days on Flathead Lake. It can be argued that these numbers may not be appropriate to maintain as they are heavily influenced by the Mack Days contests, which are a tool being used to attempt to reduce the lake trout population. Goals for angling pressure should reflect appropriate levels following the attainment of recovered bull trout and west slope cutthroat population objectives.
10. We support re-analyzing the need to maintain the current slot limit in effect on Flathead Lake. Please disclose the benefits of attracting anglers with a slot versus the negative impacts of maintaining a size cohort that accounts for the most predation on native bull trout and westslope cutthroat.
11. We recommend the ID team revisit what is known or inferred about the mortality on bull trout and cutthroat trout caused by northern pike. A final alternative should consider whether reduction of northern pike numbers could result in a measurable improvement in native fish abundance,
12. We support an extension of the current Flathead Lake and River Fisheries Co-management Plan for the duration of the pilot project.

If the results of the pilot project indicate that lake trout can be suppressed to increase bull trout and westslope cutthroat numbers, we recommend that the ultimate objective for both species – to be identified in a new co-management plan with new objectives -- should be population levels emulating those of the 1980s, when angling and limited harvest for recreational and cultural purposes was allowable. The Confederated Salish and Kootenai Tribes have supported this position throughout the current Co-management plan. We recommend both co-managers support this long-term objective. The Montana Bull Trout Restoration Plan, which FWP helped prepare and signed the same year the existing co-management plan was approved, states this as an objective.

Bull trout and westslope cutthroat are highly valued by a large constituency. They are culturally, environmentally and economically important throughout the Flathead Basin in Montana, extending into the Canadian headwaters of the North Fork Flathead River.

The Confederated Salish and Kootenai Tribes have valued and continued to work to sustain native bull trout and westslope cutthroat throughout the tribes' history. The recently signed MOU between the State of Montana and the Premier of British Columbia protecting the Transboundary Flathead used as one of its strongest arguments in favor of protection the value of headwater tributaries that are used by *threatened* and *species of special concern* bull trout and westslope cutthroat. From this perspective, it would be contradictory not to work to recover the native species that played such a key role in protecting the Transboundary Flathead. Montana anglers and non-resident visitors alike have for years generated substantial economic benefits for the state when fishing for bull trout and westslope cutthroat in the North, Middle, and Main Flathead River. The South Fork Flathead River alone provides an excellent example of what healthy populations of bull trout and westslope cutthroat provide to our area economically. Economic values for the

North, Middle, and Main Flathead River are demonstrated in numerous studies dating back to 1987², and show, when applied to increasing angler days on the Flathead River, as shown in the most recent Montana MTFWP estimates (2007), that the economic impact for the region is substantial, and continues to increase.

Thank you for pursuing the recovery of native bull trout and westslope cutthroat in the Flathead Basin. We look forward to supporting implementation of the pilot project that will result from this inclusive NEPA process.

Sincerely,

Michael Gibson



Outreach Director
Montana Trout Unlimited

Chris Schustrom



President
Flathead Valley Trout Unlimited

Paul Pochak



Incoming Chapter President
Flathead Valley Trout Unlimited

Cc. Art Noonan, Deputy Director MT Fish Wildlife and Parks
Brian Schweitzer, Governor
Hal Harper, Chief Policy Advisor, Office of the Governor
Rose Leach, NEPA Coordinator