



Superintendent
Glacier National Park
Attention: Logging/Quartz EA
P.O. Box 128
West Glacier, MT 59936

January 21, 2014

Dear Superintendent,

The Flathead Audubon Society (FAS) is a local, active group of people interested in sound stewardship and management of natural resources. Many of our members are regular users of Glacier National Park.

We have reviewed the Environmental Assessment for the Continued Lake Trout Suppression on Quartz Lake & Lake Trout Removal and Bull Trout Conservation in the Logging Lake Drainage dated December, 2013 and submit the following comments.

While FAS supports bull trout conservation and commend you for taking action on this issue, there are still points of concern with the EA and Preferred Alternative.

FAS encourages the Park to explore and implement other ways to conserve bull trout with less impact on wilderness. The adverse effects on wilderness values of the Quartz and Logging Lakes area due to the motorized equipment and level of activities required to implement the proposed actions appear understated. Use of a motorboat on each lake for 16 weeks per year is nearly 1/3 of the total year and a much higher proportion of the summer/fall when most visitors would be using the areas. Add to this the required helicopter flights and required crew presence and the quiet and solitude values of wilderness will not be present for a significant part of the year. This loss of wilderness values is proposed to continue for 7-10 years with this EA and the actions may need to continue longer.

It is well established that bull trout decline as lake trout invade and take over, but is there data to show how long it takes for bull trout to increase after lake trout suppression and over what time period? The EA describes the ongoing lake trout removal on Quartz Lake as being successful in removing a high proportion of tagged adults and also indicates that lake trout removal in other areas of Montana and Idaho have demonstrated high rates of lake trout removal. However, the EA does not provide data on whether bull trout populations have shown a positive response to these levels of lake trout removal. How do we know if the proposed lake trout removals will result in increased bull trout populations or is some still higher rate of adult and juvenile lake trout removal required before bull trout show increases? Do data exist for changes in bull trout redds or other measures of populations after lake trout suppression efforts began?

The EA states that lake trout have invaded 9 of 12 accessible lakes. What is the Park doing to prevent lake trout gaining access to the 3 non-invaded lakes given that lake trout removal is so difficult or impossible?

It was good to see as Mitigation that signs would be posted informing visitors of the activity on the lakes and the suppression efforts. We recommend that the posted information be kept current and specific spelling out when and where the activities will be occurring so visitors can modify their visit if they wish to avoid the motorized activities. We also recommend that such information be available on the Park's website.

It was good to see mitigation for common loons and bald eagles spelled out in some detail and references to the Montana Common Loon Conservation Plan and the Montana Bald Eagle Management Guidelines. However, use of terms like "avoided to the greatest extent possible," "as least disturbing as possible," and "avoid whenever possible" implies that the lake trout removal activities will override the established management plans for loons and eagles and could result in greater impacts to these species than described in the EA.

We suggest re-evaluating all activities conducted under this EA quite often, perhaps every other year, to determine their effectiveness and what should be changed not only from the fish conservation standpoint but also for wilderness values. These re-evaluations should be available and disseminated to interested individuals, organizations, and agencies.

Thank you for your consideration.

Bob Lopp, President
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