



Colleen A. Spiering, Environmental Project Manager
Bonneville Power Administration-Communications DKP-7
PO Box 14428
Portland, OR 97293-4428

December 12, 2005

Dear Ms Spiering:

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. We wish to submit the following comments concerning the Final Environmental Impact Statement (EIS) for the South Fork Flathead Watershed Westslope Cutthroat Trout Conservation Program.

Conservation of existing genetic diversity among those streams in the Project Area that have pure-strain aboriginal populations of westslope cutthroat trout should be of the highest priority and a major goal for the restocking phase of this project. As currently designed and described in the EIS, this goal would not be achieved.

Genetic analyses of fish populations in the southern project area have shown that 5 drainages have pure populations of westslope cutthroat trout that significantly differ genetically from one another and from the generic westslope cutthroat currently produced in MT FWP hatcheries. Use of the generic westslope cutthroat in these 5 drainages would be in opposition to the *Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout in Montana* (1999) to which MT FWP is a signatory, and *Recommendations of the WCT Technical Committee*.

Flathead Valley Trout Unlimited has carefully examined this proposed project, prepared and submitted sound comments relative to this same issue about which Flathead Audubon Society is expressing its concern. Flathead Audubon Society endorses Trout Unlimited comments.

The direction in the Final EIS needs to be changed to be very clear that conservation of the existing genetic diversity as discussed above is a primary goal of the restocking phase of the project and that MT FWP will work diligently toward the goal. If such changes cannot be made in the EIS direction, then Flathead Audubon Society cannot endorse or support the portion of the proposed project in the southern project area.

Lewis Young
Conservation Chair
50 Garrison Drive
Eureka, MT 59917
406-889-3492