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Sent by email on December 12, 2005 to: [comment@bpa.gov](mailto:comment@bpa.gov)

To the BPA:

The following are our supplemental comments on the DEIS (and FEIS) for the South Fork Flathead Watershed Westslope Cutthroat Trout Conservation Program.

It is with considerable reluctance that we find our organizations unable to support this project in its current form. Appropriate additions to the recommendations in the FEIS would, however, allow us to support the project with enthusiasm.

Up to this point, we have given the project our conditional approval, while, however, expressing our deep concern over the lack of attention to the issue of preserving the genetic integrity and diversity of the existing aboriginal pure WCT populations in the wilderness drainages of the project. We strongly support measures that deal with eliminating or significantly reducing the ongoing undesirable hybridization occurring in the South Fork drainage resulting from the presence of non-native trout. However, we had hoped the FEIS would address our concerns (and those of others) with respect to using a single genetic type of fish, rather than drainage-specific or stream-specific brood stocks for replacing the removed lake populations. This has not happened, as the additions to the DEIS and the "Responses to Comments" in the FEIS show.

The problem of preserving and restoring westslope cutthroat trout in Montana has been given careful consideration over the last decade. The result has been the 1999 *Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout in Montana* (WCT Conservation Agreement MOU). This document was based on the 1998 *Recommendations from the Westslope Cutthroat Trout Technical Committee for the Genetic Conservation of the Westslope Cutthroat Trout in the Upper Missouri River Drainage* (WCT Technical Committee Recommendations), the report of a statewide committee composed of Montana's most prominent fish biologists and geneticists. Montana Fish, Wildlife and Parks (MFWP) signed on to the MOU, and some of its fish biologists were members of the Technical Committee. The State of Montana continues to tell us it has not abandoned the MOU and conservation agreement. However, the alternative selected by BPA for the final FEIS fails to comply with the WCT Technical Committee's recommendations and the WCT Conservation Agreement and MOU.

The Technical Committee's recommendations are clear on the dangers of introducing hatchery WCT's into areas where native wild populations are present:

Thus there is a good possibility that some populations of westslope cutthroat trout may have some degree of local adaptation... which could be broken down, compromising population viability, if the native fish interbreed with westslope cutthroat trout introduced from other populations. It is likely that westslope cutthroat trout conservation and restoration efforts at times will call for the stocking of fish either from a hatchery brood stock or from transplants from native populations. **In view of the above possibility, the potential for these efforts to adversely impact native populations needs to be considered before introductions are made.** (Our boldface, page 5.)

The WCT Conservation Agreement MOU accepted the recommendations of the Technical Committee and accordingly set the management goal for WCT in Montana as seeking to **“ensure the long-term, self-sustaining persistence of the subspecies within each of the five major river drainages they historically inhabited in Montana..., and to maintain the genetic diversity and life history strategies represented by the remaining local populations.** (Boldface in original, page 3)

And in the Genetics/Population section of that document, we again find the explicitly stated goals, *“Maintain locally adapted, genetically pure populations,”* and *“Develop genetically diverse brook stock for use in stocking and recovery programs.”* (Our italics, page 14).

With these commitments, the signatory agencies had agreed upon a management plan that incorporated the best goals and practices of contemporary conservation genetics. It was a truly remarkable document hailed by conservation groups and fishery biologists throughout the Northwest.

And thus we are now deeply disappointed that the most extensive and ambitious project for the protection of the WCT in a Montana drainage fails to even mention the above goals, and instead intends to initiate a sustained program to stock hatchery WCT in over twenty lakes throughout the entire project area. Clearly, the potential for the destruction of the genetic diversity among the local aboriginal WCT populations in the tributaries fed by these lakes is enormous, and any restocking program (however well-intentioned) had to take this issue very seriously.

In March of 2002 we wrote to the WCT Technical Committee and made our concerns about the Project’s plans to restock the lakes in the Project region with the MO12 hatchery fish, and requested a closer examination of the genetics issues involved. Subsequently, Rob Leary of the University of Montana Fish Genetics Lab replied to the Committee, reporting that the WCT populations in most of the northern range of the project were already hybridized or significantly altered by MO12 genes (due to leaking from upstream stocked lakes). The Leary report went on to say, however, that the same was *not* true for all of the WCT populations in the southern, wilderness range of the project. Here, in Leary’s words, is what he found there:

“...substantial genetic differences exist between the MO12 fish and westslope cutthroat trout populations in the Big Salmon Creek, Gordon Creek, and Youngs-Danaher Creek drainages...” (Letter to the Westslope Technical Committee, May 16, 2002).

Leary continues by concluding that the use of MO12 trout in these drainages, “does not represent the best conservation approach.” and goes on to suggest that drainage-specific stocks be used instead.

Leary’s report has led us to revise our earlier, more global concern about introducing MO12 fish into the Project lakes. As the Leary report showed, aboriginal populations no longer exist in the northern region (Wheeler Creek drainage was possible exception), so planting MO12’s in these lakes would not be a problem. The damage to genetic diversity was already done. But the wilderness drainages are another matter, and we have repeatedly urged MFWP to similarly abide by the best science available and the WCT Conservation Agreement MOU, and agree to rethink their restocking plans.

We are not alone in our concern with the issue of preserving the genetic integrity of the aboriginal pure WCT populations, as the comments in the FEIS by fisheries professionals show. (See, for example, those by the EPA (comments 11.8, 11.59) and the Montana Chapter of the American Fisheries Society (40.10, 40.11, 40.12, 40.14).) The replies to these concerns in the FEIS, however, were either cursory and backtracking or biologically irrelevant.

For example, in its reply to Comment 37.98, MFWP stated that it was not bound by the recommendations of the Upper Missouri Westslope Technical Committee. Instead, the restocking would be carried out meeting “the goals of conservation plans in the Flathead Valley. It [presumably, “Fisheries Management Plan for the South Fork Flathead River...”] was developed specifically for conservation and management of the SF Flathead, and has been used extensively in the SF for 20 years.” This reply, in effect, disavows the goals of the WCT Conservation Agreement MOU, and puts the goals and practices of a 20 year-old management plan in their place. For the reasons discussed earlier, we regard this stance as a giant step backward for management of WCT recovery and protection in the Flathead Valley and in the State of Montana.

When the issue of preserving genetic diversity among local populations is raised in the FEIS comments (as in those by the EPA and MAFS cited above), BPA’s reply is biologically irrelevant. (See Replies to comments 11.8, 11.59, 37.8, 37.87.) The MO12 stock is defended as pure and having sufficiently high levels of internal genetic diversity. However, genetic diversity *within* the MO12 stock (its level of heterozygosity) is not the issue raised here. The issue is the extent to which using the MO12 hatchery stock in the wilderness drainages will eventually obliterate the genetic diversity *among* those local pure WCT populations. The replies in the FEIS never face this crucial issue head on.

The upshot of all this is that in the FEIS we are left with a Project that a) rightly seeks to protect some hatchery-altered pure WCT populations in the northern drainages from hybridization , but b) by indiscriminately stocking hatchery WCT in the wilderness drainages, will eventually convert the remaining pure aboriginal populations in the Project area into similar hatchery-altered stocks. Eventually, as the MO12 fish continue to move into the tributaries from the lakes, the genetic diversity among the local populations in these drainages will be destroyed, and, from a conservation genetics point of view, so will these local populations.

Clearly, there is no need to take such a rigid approach. The restocking project can be managed so as to make every effort to preserve the genetic integrity of the remaining pure aboriginal stocks whenever this is biologically feasible. Without such a commitment from MFWP, this project will set a dangerous and regressive precedent for westslope cutthroat conservation in the State of Montana.

There are, we believe, indications that MFWP has become increasingly aware of the dangers to genetic diversity in the wilderness drainages that could result from indiscriminate stocking of MO12 fish there. Recent discussions with MFWP give us some hope that the final EIS will contain language wherein MFWP: 1) agrees to carry out the Project in accord with the goals of the WCT Conservation Agreement MOU and the WCT Technical Committee Recommendations; 2) commits to making every effort to preserve the genetic integrity and diversity of the remaining pure WCT aboriginal populations in the Project's wilderness region when this is biologically feasible; and 3) commits to developing drainage-specific or (preferably) stream-specific brood stocks if they will be necessary to achieve these goals. If such commitments are added to the FEIS and the Record of Decision, then Montana Trout Unlimited and Flathead Valley Trout Unlimited believe that the resulting project will be a source of pride to all those involved, and we will give the Project our full and public support. Without such commitments, however, we will be forced to oppose the Project.

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Sincerely,

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