



***Montana Fish,  
Wildlife & Parks***

Region One Fisheries  
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and

**BONNEVILLE POWER ADMINISTRATION**

**(DOE/EA-1932)**

**B O N N E V I L L E**  
**P O W E R A D M I N I S T R A T I O N**



**ENVIRONMENTAL ASSESSMENT AND DECISION NOTICE  
FOR  
THE FLATHEAD RIVER HYBRID TROUT SUPPRESSION PROJECT**

March 18, 2013

**Decision Summary:**

Montana Fish, Wildlife & Parks (MFWP) will continue to remove rainbow and hybrid trout from five specified streams (Abbot, Sekokini, Ivy, Rabe, and Third Creeks) in the upper mainstem and North Fork Flathead River to reduce the threat of hybridization with westslope cutthroat trout. See the Decision Notice section at end for complete details.

**Project Proposal and Justification:**

MFWP proposed to continue removing hybrid and rainbow trout from the mouths and channels of Abbot, Sekokini, Rabe, Ivy, and Third Creeks in the mainstem and the North Fork of the Flathead River. These efforts would be a continuation of work initiated in 2000, the purpose of which was to suppress the hybrid and rainbow trout population in Abbot Creek and reduce the threat of hybridization to westslope cutthroat trout persistence.

Although complete eradication of hybrid trout is not possible in a large interconnected system, such as the Flathead, results to date indicate that hybrid and rainbow spawner abundance can be significantly reduced at source tributaries, and that it may be possible to reduce the spread of hybridization so that most populations of westslope cutthroat trout remain below a hybridization threshold defining conservation populations (i.e., containing > 90% westslope cutthroat trout genetic material).

Trapping and electrofishing will be used to remove fish during their spawning season (April-May, with a maximum of 4 electrofishing-only visits/week by jet boat). Catch per unit effort (number of fish removed relative to effort spent removing them) will be monitored annually to evaluate the effectiveness of this method for reducing spawner abundance at source populations. Additionally, genetic samples will be collected from upstream tributary populations in 4-5 years to determine whether this effort has significantly reduced the rate of increase of rainbow trout hybridization to achieve the goal of maintaining westslope cutthroat trout populations in the drainage. Evaluation of these success criteria will allow for adaptive management of the suppression effort. The time frame for evaluating success criteria is derived from the minimum amount of time that, based on the biology of cutthroat trout, MFWP would expect to detect meaningful changes in the rate of spread of hybridization. Finally, the fish passage barrier in the Highway 2 culvert in Abbot Creek will be maintained as needed.

The approved action is consistent with the goals of the cutthroat trout Memorandum of Understanding (MOU), which are to: 1) ensure the long-term persistence of cutthroat trout distributed across their historical ranges, 2) maintain the genetic integrity and diversity of nonhybridized populations, as well as the diversity of life histories, and 3) protect the ecological, recreational, and economic values associated with cutthroat trout.

### **Environmental and Social Impacts of Project:**

There will be changes to the fish community in the Flathead River system associated with the action. The spawning populations of rainbow trout and hybrids in Abbot, Sekokini, Ivy, Rabe, and Third Creeks will be reduced, and westslope cutthroat trout would remain the predominant trout species in this reach of river. Suppression efforts focus on the upper Flathead; tributaries in the lower Flathead River that contain rainbow and hybrid trout will be unaffected and remain available for private and commercial (outfitted) fishing opportunity. The economic impact of the proposed action is difficult to measure primarily due to a lack of information describing angler use and catch rates in this specific reach of river. The approximate annual cost of hybrid trout suppression efforts is \$9,500, funded by Bonneville Power Administration. Trout removed from targeted streams would no longer be available to river anglers, but would be transported to a local community fishing pond (e.g., Pine Grove Pond in Kalispell) and made more accessible to the general public.

The seasonal use of fish traps may cause limited redirection of water as flows increase. Traps are monitored and cleaned daily during high flows, minimizing bank erosion. Periodic maintenance of the culvert fish migration barrier in Abbot Creek will continue to prevent spawning of hybrid trout. Migratory bull trout do not use Abbot Creek for spawning, rearing, or overwintering habitat and would not be affected by the barrier. Eastern brook trout occupy the upper portions of Abbot Creek and are primarily resident (nonmigratory); thus, eastern brook trout will not be affected by the barrier.

Noise levels from jet boat use will increase in frequency in the affected area during portions of late March-May when suppression efforts are occurring. However, few recreational users are encountered in the project area during this time of year because of high flows, turbid water, and inclement weather. Brief periods (< 5 minutes per occurrence) of nuisance noise from jet boat use may be experienced for the limited number of residents along the Wild and Scenic portion of the mainstem and North Fork Flathead River.

No harmful substances will be used during implementation of the proposed project.

### **Public Involvement:**

In compliance with the Montana Environmental Policy Act, an environmental assessment (EA) was prepared and circulated for public comment from February

6 through March 8, 2013. A news release was distributed and shared by local media (Hungry Horse News, the Flathead Beacon, and Montana Public Radio), and notification was sent to local conservation groups, legislators, and natural resource agencies. Copies of the EA were made available at local libraries, the state library in Helena, the MFWP Region 1 headquarters in Kalispell, and the MFWP internet web site. In addition to the written EA, MFWP presented the proposed work to the local chapter of Trout Unlimited and to Flathead Wildlife. During the public comment period for the EA, MFWP received comments from 31 individuals or groups. The comments were varied, but could basically be divided into three general positions. MFWP received five general comments or inquiries requesting additional information or clarification of information presented. MFWP received fifteen comments in opposition and eleven comments in support. In order to reduce redundancy and increase efficiency, MFWP has grouped the comments and our responses into the following groups. The numbers in parentheses following "Comment" represent the number of similar individual comments.

### **Comments in opposition of continuing the Flathead River Hybrid Trout Suppression Project**

#### **1 – Comment (6):**

This project is a waste of public/other funds.

#### **Response:**

The approximate total annual cost (including personnel costs) of continuing the Flathead River Hybrid Trout Suppression Project is under \$10,000. Financial support comes from the Bonneville Power Administration with the intention of mitigating for losses attributed to the construction and operation of Hungry Horse Dam. No tax dollars or license fee funds are applied to this project.

#### **2 – Comment (1):**

Evolution and survival of the fittest will prevail.

#### **Response:**

Native trout have evolved and survived in the Flathead River system. In contrast, rainbow trout were introduced to the Flathead River system in the early 1930s. Historic fish stocking has significantly changed the distributions and abundances of our native fishes, with unknown consequences to their associated local ecosystems, economies, and human societies. Human-mediated habitat loss and introduced nonnative species are the leading causes of native species declines, and this includes westslope cutthroat trout. Presently, nonhybridized westslope cutthroat trout are estimated to occupy less than 10% of their historic range in the United States and less than 20% of their historic range in Canada. Within Montana, the South Fork of the Flathead River drainage upstream of Hungry

Horse Dam represents about half of the remaining large, interconnected habitat for nonhybridized westslope cutthroat trout. The North and Middle forks of the Flathead comprise an additional 25% of the remaining nonhybridized populations in the state.

Introduced rainbow trout exist in the mainstem Flathead River and readily hybridize with native westslope cutthroat trout. The consequences of this hybridization include: 1) potential loss of evolved traits in native species that help them thrive in their environment, 2) social and economic impacts associated with the decline of unique angling opportunities offered by westslope cutthroat trout, and 3) the increased potential for listing under the federal Endangered Species Act, affecting management of the species.

Over time, the likely result of ceasing hybrid trout suppression would be a more rapid, continued loss of nonhybridized westslope cutthroat trout resulting from the upstream expansion of rainbow trout hybridization. A reduction in the range of westslope cutthroat trout could lead to listing under the Endangered Species Act, changing management of the species from state to federal jurisdiction. It is possible that under the no-action alternative, nonhybridized westslope cutthroat trout would eventually become locally extinct (extirpated) in the North Fork, Middle Fork, and mainstem of the Flathead system altogether. This alternative would not meet the primary goals of the collaboratively-developed Memorandum of Understanding for Yellowstone Cutthroat Trout and Westslope Cutthroat Trout in Montana, which are to: 1) ensure the long-term, self-sustaining persistence of each subspecies distributed across their historical ranges as identified in recent status, 2) maintain the genetic integrity and diversity of nonhybridized populations, as well as the diversity of life histories, represented by remaining cutthroat trout populations, and 3) protect the ecological, recreational, and economic values associated with each subspecies. This action would not achieve one of the goals of MFWP's Fisheries Program, namely to "protect, maintain, and restore native fish populations, life cycles, and genetic diversity and continue to provide angling opportunities whenever possible."

### **3 – Comment (4):**

The public doesn't care what kind of fish they're catching.

### **Response:**

MFWP acknowledges that many anglers are not concerned with what species of fish they catch; however, that statement does not describe all anglers who fish the Flathead River, demonstrated by the range of comments submitted for this EA. MFWP is working to conserve westslope cutthroat trout in the Flathead system for a variety of reasons described in the previous response. Westslope cutthroat provide a unique and enjoyable recreational fishery.

#### **4 – Comment (3):**

Killing fish is inhumane or otherwise undesirable.

#### **Response:**

MFWP has and will continue to transport live hybrid and rainbow trout captured during the Flathead River Hybrid Trout Suppression Project to the Pine Grove Pond in Kalispell. Therefore, these fish are not wasted or killed, but are available to provide angling opportunity.

#### **5 – Comment (3):**

Hybrid and rainbow trout are pleasurable to catch.

#### **Response:**

MFWP acknowledges that many anglers enjoy fishing for and catching nonnative species, including rainbow and hybrid trout in the Flathead River system. The Flathead River Hybrid Trout Suppression Project is focused on the upper Flathead system, with removals targeted upstream of the confluence with the South Fork Flathead River. An average of 126 fish have been removed from this portion of the Flathead annually since 2000. Since 2009, an average of 28 adult fish and 61 total (all sizes) have been transported annually following a population estimate performed in the mainstem Flathead River near Columbia Falls. The majority of fish removed are transported to Pine Grove Pond in Kalispell and are ultimately made more accessible to anglers.

In addition to populations documented in the mid-upper Flathead drainage, rainbow trout exist in lower elevation tributaries to the mainstem Flathead River. MFWP has shown using genetic information and tracked fish movements that a relatively small amount of mixing occurs between lower Flathead sources of rainbow trout and the upper Flathead system. Together, this information suggests that suppression efforts focused at source streams may not be compromised by the existence of rainbow and hybrid trout populations further downstream in the system. Further, it ensures that angling opportunities for rainbow and hybrid trout residing in lower portions of the Flathead River system will not likely be compromised as a result of the Flathead River Hybrid Trout Suppression Project.

#### **6 – Comment (1):**

MFWP is only proposing this work to keep westslope cutthroat trout from being listed under the Endangered Species Act.

#### **Response:**

MFWP is working to conserve westslope cutthroat trout in the Flathead River system for many reasons, and potential listing of the species under the

Endangered Species Act (ESA) is only one component. MFWP relies heavily on a collaborative document known as the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana (2007). This guide was developed jointly by resource agencies, conservation and industry organizations, tribes, resource users, and private landowners to represent a diverse set of interests while conserving the cutthroat trout that remain. MFWP acknowledges that the listing of westslope cutthroat trout under the ESA would affect management of the species in Montana. However, the basis for MFWP's conservation efforts and the foundation of the ESA are grounded in the same goals – namely, to conserve and manage our shared living resources so they ultimately don't need human protection.

The goal of MFWP's Fisheries Program is to “protect, maintain, and restore native fish populations, life cycles, and genetic diversity and continue to provide angling opportunities whenever possible.” The effort is further supported in the Statewide Fisheries Management Plan, which states that native fish conservation will be prioritized where “practical and feasible.” The basic legal responsibility of MFWP (MCA 87-1-201) is the “protection, preservation, management, and propagation of fish, game, fur-bearing animals and game, and nongame birds within the state.” The department has the exclusive power to spend for these purposes. MCA 87-1-201 also states the department shall implement programs that 1) manage wildlife, fish, game, and nongame animals in a manner that prevents the need for listing under the state or federal endangered species acts, and 2) manage listed species, sensitive species, or a species that is a potential candidate for listing under the state or federal ESA in a manner that assists in the maintenance or recovery of those species.

### **7 – Comment (1):**

MFWP will never get rid of all the rainbows and hybrids.

### **Response:**

The overall goal of this project is to maintain the current number of conservation populations of westslope cutthroat trout (i.e., are > 90% genetically pure westslope cutthroat trout). MFWP acknowledges that the project area lies within an open system that will contain rainbow and hybrid trout into the future. However, a focused and directed suppression effort, coupled with monitoring and quantifiable success criteria, will better allow MFWP to evaluate how effective the agency can be in conserving native westslope cutthroat trout into the future. MFWP's efforts have already reduced the number of hybrid and rainbow trout spawning in targeted tributaries annually. Further, the rate of hybridization spread in the upper Flathead drainage had declined since suppression efforts started.

### **8 – Comment (1):**

Let the rainbow trout take over and create blue ribbon fisheries like we see in the Madison, Missouri, etc., drainages across the state.

### **Response:**

The number of trout available to anglers in the Flathead River system would not increase substantially as a result of losing westslope cutthroat trout populations. Rainbow trout would simply replace cutthroat trout. Productivity in the Flathead system is largely determined by the underlying geology, hydrologic regime, seasonal weather patterns, and climate. The Flathead River does not have the environmental conditions conducive to producing a rainbow trout fishery, such as is presently found in rivers such as the Missouri or Madison, since Flathead River water is some of the least productive water in Montana.

### **9 – Comment (1):**

Stock native fish instead of removing rainbows and hybrids.

### **Response:**

Until the early 1970s, it was believed the best way to maintain good fishing in rivers and streams was to stock trout. Consequently, most major rivers and streams were stocked by MFWP every year, usually with 5-10-inch rainbow trout. This practice was halted in the early 1970s after studies on the Madison River and elsewhere showed that stocking hatchery trout in rivers and streams usually made fishing worse because the hatchery fish did not survive very long, but in the meantime they reduced the abundance of the wild trout through competition. As the hatchery trout died or were caught, the overall abundance of trout was actually reduced. As a result, Montana adopted a management policy that emphasizes naturally reproducing wild trout. However, trout do not reproduce well in many lakes and reservoirs. Therefore, stocking of hatchery trout became more focused on these waters and annual stocking of many lakes and reservoirs continues to this day, where higher productivity yields higher survival and growth.

### **10 – Comment (1):**

Focus on improving habitat instead of removing fish.

### **Response:**

The Flathead River drainage contains high quality aquatic habitat that is uniquely protected in large part by surrounding public lands, including Glacier National Park and Flathead National Forest. Where habitat degradation or loss is evident, MFWP has demonstrated its primary commitment is to improving resources available to fish and other aquatic life as is practical and feasible. Work is done in partnership with land managers such as the US Forest Service and Montana

Department of Natural Resources and Conservation (State Lands). Examples include past and ongoing work to improve spawning and rearing habitat for native fishes in the South Fork Coal Creek and Hallowat Creek drainages, tributaries to the North Fork Flathead River. Culvert replacements on eight tributaries to Hungry Horse Reservoir resulted in migratory fish access to 16% more stream habitat. Land acquisitions funded by Bonneville Power Administration (BPA) and other partners have been secured for fish and wildlife protection. MFWP's understanding of and commitment to aquatic habitat conservation has also included working with the Bureau of Reclamation and BPA to change the operation of Hungry Horse Dam to benefit fish and other aquatic life while maintaining power generation and flood control needs.

**11 – Comment (2):**

Please do not use fish poisons in our waters – they kill animals that eat the dead fish and harm people.

**Response:**

No rotenone or other fish toxicant has been used or proposed for use in the Flathead River Hybrid Trout Suppression Project. Rotenone, when applied by licensed applicators according to EPA-approved labeling, does not harm humans or animals that eat fish killed by rotenone.

**Comments in support of continuing the Flathead River Hybrid Trout Suppression Project**

**12 – Comment (7)**

Thank you for helping our native fish; we appreciate the opportunity to comment.

**Response:**

MFWP appreciates the support and positive feedback on efforts to conserve our shared natural resources.

**13 – Comment (3)**

You have demonstrated encouraging results from your suppression efforts thus far.

**Response:**

MFWP believes that measurable success criteria are the only reliable way of evaluating project viability and success. Results to date are encouraging and favor continuation of the effort with annual evaluation of success criteria.

#### **14 – Comment (11)**

We support the continuation of your suppression efforts.

#### **Response:**

MFWP appreciates the support and positive feedback on efforts to conserve our shared natural resources.

#### **15 – Comment (1)**

Taking action now will provide the least disruption to people's enjoyment of our rivers, fish, and wildlife.

#### **Response:**

MFWP agrees that delaying action to conserve remaining migratory populations of westslope cutthroat trout in the interconnected Flathead River system could lead to outcomes less desirable than the hybrid and rainbow trout suppression efforts underway. For example, ceasing suppression efforts would likely result in a more rapid, continued loss of nonhybridized westslope cutthroat trout from the upstream expansion of rainbow trout hybridization. A reduction in the range of westslope cutthroat trout could lead to listing under the Endangered Species Act, changing state management of the species. It is possible that under this alternative, nonhybridized westslope cutthroat trout would eventually become locally extinct (extirpated) in the North Fork, Middle Fork, and mainstem of the Flathead system altogether.

#### **16 – Comment (1)**

Strong native species populations are essential to regional ecological health.

#### **Response:**

MFWP agrees that native species play a critical role in local ecosystems. Conserving organisms that have evolved regionally is a strategy MFWP employs when possible, acknowledging that species often serve ecosystem functions that are not well understood and may not be replaced by nonnative organisms.

#### **17 – Comment (1)**

The goal of this project is consistent with the management goals of Glacier National Park.

#### **Response:**

MFWP appreciates the support of Glacier National Park.

### **18 – Comment (1)**

This project is well designed and an excellent example of applying research to management goals.

#### **Response:**

MFWP appreciates the support and strives to apply its research activities to applicable management issues and strategies.

### **19 – Comment (2)**

Rainbow trout are an important species for Montana anglers, but they are under no threat to continued existence in Montana or in the Flathead.

#### **Response:**

MFWP agrees that rainbow trout are prevalent across the state of Montana and in the Flathead system and that there are no current threats to the species persistence. The suppression of hybrid source populations in the upper Flathead system will not change that status in Montana.

### **20 – Comment (1)**

Protection of hybridized populations or failure to continue suppression efforts is highly likely to facilitate continued expansion of hybridization, which may lead to a loss of local adaptations and productivity of westslope cutthroat trout populations.

#### **Response:**

MFWP has demonstrated its commitment to continued suppression of hybrid trout in the upper Flathead system with the goal of conserving remaining westslope cutthroat trout populations.

### **21 – Comment (1)**

The Flathead National Forest strongly supports this project to conserve and restore native fish.

#### **Response:**

MFWP appreciates the support of the Flathead National Forest.

### **22 – Comment (1)**

This work may be particularly critical in the face of climate change.

**Response:**

MFWP acknowledges that there are many factors on the landscape that can influence the spread of hybridization across the interconnected Flathead River system. Climate change may lead to locally warming water temperatures, changes in hydrologic patterns, and more frequent forest fires. Rainbow trout have a higher tolerance for warmer stream temperatures, potentially facilitating the spread of hybridization in a warming climate. MFWP cannot control the climate, but it can make an effort to stem the spread of hybridization and resulting loss of westslope cutthroat trout across the interconnected basin.

**23 – Comment (2)**

Transferring fish to a land-locked pond seems like a good idea, given it's cost effective and not connected to other waterways or subject to flooding.

**Response:**

MFWP appreciates the concern for cost savings and counterproductive fish transports. Pine Grove Pond is located along the return route from the Flathead River to MFWP headquarters in Kalispell, and stopping along the way to drop off fish adds little time to the commute. Pine Grove is also adjacent to the Whitefish River, where rainbow trout are present. The Whitefish River joins the Stillwater River and flows into the mainstem Flathead near Kalispell. Based on genetic information and tracked fish movements, MFWP considers these fish to be largely separate from the hybrids and rainbow trout targeted for suppression in the upper Flathead system. Though it would take greater than a 100-year flood to connect Pine Gove Pond and the Whitefish River, MFWP is not concerned about the implications of such connectivity from the perspective of westslope cutthroat trout conservation.

**24 – Comment (1)**

Native species conservation should take precedence over sport fishing.

**Response:**

MFWP acknowledges and respects the diversity in opinions and values represented by Montanans and visitors, and seeks to balance them where possible. MFWP believes the Flathead River Hybrid Trout Suppression Project provides benefit for native fish conservation and angling for westslope cutthroat trout. First, relatively few rainbow and hybrid trout are removed from the upper Flathead River annually, and fish are in large part transported to the Pine Grove Pond in Kalispell for greater fishing opportunity. Additionally, MFWP anticipates a shift over time towards a higher percentage of westslope cutthroat trout genetic material in hybrids in the upper Flathead River with removal of rainbow and hybrid trout. Finally, rainbow trout exist in lower elevation tributaries to the mainstem Flathead River. MFWP has shown, using genetic information and tracked fish

movements, that a relatively small amount of mixing occurs between lower Flathead sources of rainbow trout and the upper Flathead system. This information indicates that angling opportunities for rainbow and hybrid trout residing in lower portions of the Flathead River system will not likely be compromised as a result of the Flathead River Hybrid Trout Suppression Project.

MFWP proposes continuation of the Flathead River Hybrid Trout Suppression Project because it seeks to achieve both angling opportunity and native species conservation, addressing a primary goal of its Fisheries Program to “protect, maintain, and restore native fish populations, life cycles, and genetic diversity and continue to provide angling opportunities whenever possible.” The effort is further supported in the Statewide Fisheries Management Plan, which states that native fish conservation will be prioritized where “practical and feasible.”

### **Questions about the Flathead River Hybrid Trout Suppression Project and general comments**

#### **25 – Comment (1):**

Rainbow and westslope cutthroat trout have coexisted for decades without hybridization taking over. Why are we concerned now?

#### **Response:**

Rainbow trout have been present in the interconnected Flathead River system since the early 1930s. Since that time, hybridization between rainbow and westslope cutthroat trout has occurred to some extent where the species overlap in spawning time and location. During recent years, however, surveys have shown that hybridization has spread more rapidly, because hybrids overlap more often with wild cutthroat spawners. Additionally, rainbows escaped into the drainage from a historic rainbow trout hatchery near Blankenship. MFWP has since replaced the rainbow trout farm with a conservation facility raising Montana’s state fish, the westslope cutthroat. Climate change is predicted to continue to warm stream temperatures and shift hydrologic patterns, conditions that may favor rainbow and hybrid trout expansion and promote further loss of westslope cutthroat trout populations. Conservation actions such as the Flathead River Hybrid Trout Suppression Project are needed to minimize the abundance of hybrid populations and conserve the unique fishery resources remaining.

#### **26 – Comment (1)**

Do you expect a reduction in sport fishing opportunities, at least temporarily?

#### **Response:**

MFWP has removed an average of 126 from the upper Flathead River annually since 2000. Since 2009, an average of 28 adult fish and 61 total (all sizes) have been transported annually following a population estimate performed in the

mainstem Flathead River near Columbia Falls. The majority of fish removed are transported to Pine Grove Pond in Kalispell and are ultimately made more accessible to anglers. Although adult hybrid and rainbow trout are reduced in the upper Flathead annually, some of the streams we target still support westslope cutthroat trout (3 of the 5) and can potentially be replaced with less hybridized or genetically pure fish. Over time, those streams could shift towards a larger proportion of westslope cutthroat trout. We would expect westslope cutthroat trout to replace rainbows and hybrids removed from the Flathead and North Fork rivers.

**27 – Comment (1)**

Have alternatives to jet boat use been considered?

**Response:**

MFWP regrets any disturbance caused by jet boat use on the upper Flathead's Wild and Scenic River corridor. However, it is a uniquely effective tool used prior to and during spring runoff on the river. It is the most efficient way of removing staging hybrid and rainbow trout spawners from targeted tributary mouths. In the case of Third Creek, jet boat access is the only feasible means of accessing the stream at the frequency needed to be effective. MFWP has explored using alternative, quieter jet boat engines. However, the power needed to navigate the Flathead River necessitates the engines MFWP currently uses.

**28 – Comment (1)**

Can anglers be used to help target spawning rainbow and hybrid trout?

**Response:**

MFWP appreciates support from anglers interested in helping to reduce the number of spawning hybrid and rainbow trout in the upper Flathead River. At this time, however, challenges associated with maintaining data and tracking angler information prevent MFWP from employing anglers on a widespread basis. However, MFWP does support the harvest of rainbow trout as per fishing regulations (up to 5 fish per day) in the Flathead River.

**29 – Comment (2):**

Allow for the harvest of hybrid trout.

**Response:**

MFWP is exploring the idea of liberalizing hybrid trout regulations in the Flathead River system. Rainbow trout harvest has been liberalized in recent years, removing the length limit on combined trout kept. However, the main challenge associated with a regulation change is creating a clear and enforceable hybrid

definition for the public that will result in correct identification of hybrids by anglers. Hybrids display the range of physical characteristics represented by westslope cutthroat trout and rainbow trout, which at times makes it difficult to reliably identify hybrids from westslope cutthroat trout. Distinguishing characteristics of westslope cutthroat trout include a reddish orange throat “slash,” few spots below the lateral line, and the absence of white leading edges on all fins. Some hybrids will have all of these characteristics as well. Ultimately, a regulation change would likely favor removal of hybrids that have large amounts of rainbow trout genetic material (i.e., they look more like rainbow trout and are therefore easier to identify as hybrids) to minimize the number of westslope cutthroat trout that are accidentally harvested.

### **30 – Comment (1):**

Suppression efforts should be expanded to additional streams to be more effective.

### **Response:**

The information collected by MFWP describing the spread of hybridization in the upper Flathead River system indicates that tributaries upstream of those targeted in the Flathead River Hybrid Suppression Project may serve as future sources of hybridization in the drainage. However, it is important to understand that those populations are hybridized because of straying of hybrid trout from those sites presently targeted for suppression. Targeting those additional streams would likely further reduce the number of successfully spawning hybrid trout annually, yet the challenges of expanding to streams such as Dutch, Anaconda, Camas, and Big Creeks (for example) present substantial logistical challenges. To varying degrees, the drainages mentioned are at times more remote, difficult to access, and larger than those presently targeted. Tributary mouth electrofishing by jet boat would be impossible and alternative means (e.g., raft electrofishing) would be relatively time and labor intensive, and often dangerous. Trapping in these drainages would also be difficult to impossible because of the streamflow volume during the hybrid and rainbow trout spawning period, and the difficulty in accessing traps at a frequency required to maintain them. Further, westslope cutthroat trout are still present in these drainages and may be harmed if exposed to excessive flows in traps. Summer or fall instream electrofishing for removal of juvenile and subadult rainbow and hybrid trout is possible and may be explored, but high discharge and the difficulty in distinguishing young hybrids from young westslope cutthroat trout would challenge the efficacy of those efforts.

However, MFWP recognizes the importance of continued monitoring and exploring alternative approaches. Minimally, additional tributaries identified as streams containing hybridization will be genetically evaluated on a regular basis. The decision to suppress additional tributaries would involve weighing the challenges described above against the potential gains and conducting another MEPA process.

### **31 – Comment (1)**

Kids and adults should be allowed to fish for anything and keep whatever they catch.

#### **Response:**

MFWP supports angling opportunities for many different species and locations, and Montana resident kids under the age of 12 do not currently need a license to fish. Kids aged 12-14 can fish with just a conservation license. However, all adults and kids need to adhere to fishing regulations that are designed to support conservation and management of our shared aquatic resources for current and future generations. The fishing regulations have been liberalized in recent years with respect to rainbow trout harvest in the Flathead River, removing the length limit. Fish removed during the Flathead River Hybrid Trout Suppression Project are in large part transported to Pine Grove Pond in Kalispell where kids and adults can more easily fish for them. Kids under the age of 15 can also keep one fish daily and in possession from Pine Grove Pond.

### **32 – Comment (4):**

Lake trout and/or northern pike are the real threat to westslope cutthroat trout.

#### **Response:**

MFWP acknowledges that interactions with introduced nonnative species have caused declines in westslope cutthroat trout populations in the Flathead River system. Although lake trout and northern pike have been shown to consume westslope cutthroat trout, that does not diminish the threat that hybridization with rainbow trout poses to the persistence of the species.

### **33 – Comment (1)**

This seems like a “forever” project.

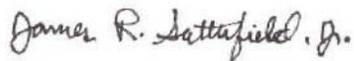
#### **Response:**

MFWP has created measurable success criteria to evaluate the Flathead River Hybrid Trout Suppression Project over time. These success criteria, described in the EA, explain MFWP’s expectations of success. A reevaluation of the project will occur, and if project goals are not being met, alternative actions will be considered (including cessation of suppression).

### **Decision Notice and Finding of No Significant Impact (FONSI):**

Based on the comments MFWP received during the public comment period for the draft EA of the Flathead River Hybrid Trout Suppression Project, MFWP has prepared the final EA for this project. No changes were made to the draft EA;

therefore, the draft will become the final document. MFWP believes the most efficient and responsible alternative to accomplish the goal of maintaining the current number of conservation populations of westslope cutthroat trout (i.e., are > 90% genetically pure westslope cutthroat trout) would be accomplished by implementing the preferred alternative (continued hybrid trout suppression). Comments in opposition for the preferred alternative were submitted by various private citizens. Comments in support for the preferred alternative were submitted by private citizens, Glacier National Park, Flathead National Forest, the U.S. Geological Survey, Montana Headwaters, and the Flathead Valley Chapter of Trout Unlimited. I acknowledge and appreciate the comments submitted in opposition to the project, but I believe the issues raised were adequately addressed and accounted for by MFWP. I have evaluated the EA and applicable laws, regulations, and policies and have determined that this action will not have a significant effect on the human environment. Therefore, an environmental impact statement will not be prepared, and I recommend that MFWP implements the proposed Flathead River Hybrid Trout Suppression Project at this time.



James R. Satterfield Jr., Ph.D., Supervisor  
MT Fish, Wildlife & Parks, Region One

3/18/13  
Date