



DECISION NOTICE

Bull Trout and Westslope Cutthroat Trout Enhancement Through Non-Native Fish Removal (FWP-CEA-FSH-R1-26-021)

5/01/2026

ACTION

Decision Notice (DN). Montana Fish, Wildlife & Parks (FWP) shall prepare a DN for the proposed action. The DN must identify the agency decision, the reasons for the decision, and any special conditions surrounding the decision or its implementation.

With this action, FWP hereby adopts the Draft Environmental Assessment or Draft EA as final, without, and approves Alternative 2, the proposed action.

AUTHORITY: MONTANA ENVIRONMENTAL POLICY ACT

According to the applicable requirements of the Montana Environmental Policy Act or MEPA and its implementing rules and regulations, before a proposed action may be approved, environmental review must be conducted to identify, consider, and disclose any potential impacts of the proposed action on the affected human environment. The level of environmental review will vary with the complexity and seriousness of environmental issues associated with a proposed action. The level of public interest will also vary. The agency is responsible for adjusting public review to match these factors. *Title 75, Chapter 1, Parts 1 through 3, Montana Code Annotated (MCA)*.

Based on these factors, FWP determined a Checklist EA (Draft EA) constitutes the appropriate level of review for the proposed action. Therefore, to assess and disclose potential impacts of the proposed action, FWP prepared a Draft EA for public review and comment. See *Public Participation Process* below.

Further, FWP must consider any substantive comments received in response to an EA and proceed in accordance with one of the following steps: determine the EA did not adequately reflect the issues raised by the proposed action and issue an Environmental Impact Statement or EIS; determine the EA did not adequately reflect the issues raised by the proposed action and issue a supplemental EA; or determine the Draft EA adequately addressed the issues raised by the proposed action and make a final decision, with appropriate modification resulting from the analysis provided in the Draft EA and the analysis of any substantive public comments received. See *Public Comment and FWP Response* below.

PUBLIC PARTICIPATION PROCESS

The Draft EA was made available for public review and comment from 04/1/2026 to 4/15/2026. The Draft EA was posted on FWP's Public Notice webpage: <https://fwp.mt.gov/news/public-notices>. The Draft EA

was also made available for public review on the Environmental Quality Council or EQC website: <https://leg.mt.gov/mepa/search/>, by individual request, and through notice to identified interested parties. FWP received comments during the public comment period.

DESCRIPTION OF PROPOSED ACTION

Bull Trout and westslope cutthroat trout are two of the handful of native fish species that have adapted over thousands of years to conditions in the Lower Clark Fork drainage. However, the relatively recent introduction of non-native species like rainbow trout, brown trout, and brook trout seriously threaten the persistence of these native fish through hybridization (interbreeding) and competition for resources. Bull trout are listed as a Threatened Species under the US endangered species act and classified as a Special Concern or Threatened by the Committee of Status of Endangered Wildlife in Canada. Bull trout have declined in population number and size across Montana in the last several decades. Existing populations are generally small and stable or in decline, and few robust populations remain (Kovach et al. 2018). Westslope cutthroat trout occupy approximately 58% of their historical habitat in the United States (May 2009). At the time of the most recent comprehensive status assessment, only about one-third of existing populations were believed to be non-hybridized (Shepard et al. 2005). In Montana, these declines have resulted in multiple conservation designations, including Species of Special Concern (State of Montana; Montana Chapter of the American Fisheries Society), Special Status Species (U.S. Bureau of Land Management), and Sensitive Species or Species of Conservation Concern across several National Forests (U.S. Forest Service).

The Clark Fork River is Montana's largest river by discharge. The Lower Clark Fork River (LCFR) begins at the confluence with the Flathead River and continues northwestward 165 km before entering Lake Pend Oreille, Idaho, a large (380 km²), deep (350 m) natural lake in the Idaho panhandle. The LCFR was historically an important migratory corridor for bull trout and westslope cutthroat trout which spawned in Montana tributaries but matured in Lake Pend Oreille (Huston 1985). However, in the 20th century, three dams were constructed that have restricted migrations of native fishes and greatly altered the hydrology and habitat of the river. Within the LCFR, the Bull River drainage represents the only remaining open system where non-hybridized westslope cutthroat trout are widespread and most tributaries are largely if not entirely inhabited by non-hybridized westslope cutthroat trout (Rehm 2025). Additionally, the Bull River hosts the only remaining migratory (fluvial) westslope cutthroat trout in the LCFR (Katzman and Hintz 2003). The East Fork Bull River supports the only remaining bull trout population in the Bull River drainage and at present, is one of the three Montana tributaries in the LCFR that still contains meaningful numbers of bull trout that naturally exhibit an adfluvial life history. An upstream and downstream trap and transport program for bull trout in the East Fork Bull River has been ongoing for >20 years to mitigate for passage barriers created by dams and bypass the lower Clark Fork reservoirs, which provide poor-quality salmonid habitat and support abundant non-native predators.

Contemporary observations have shown an increase in non-native fish in the lower reaches of the East Fork Bull River (Rehm and Tholl 2023; Rehm et al. 2026). Recent genetic analysis of westslope cutthroat trout in the Bull River drainage revealed that non-hybridized westslope cutthroat trout are widespread, and most tributaries are largely if not entirely inhabited by non-hybridized westslope cutthroat trout. However, the lower reaches of the East Fork Bull River were identified as a hotspot of hybridization between westslope cutthroat trout and rainbow trout that threatens the rest of the non-hybridized westslope cutthroat trout in the Bull River drainage (Rehm 2025). Additionally, a recent increase in hybrids between bull trout and brook trout was also identified in the lower reaches of the East Fork Bull River during the most recent sampling efforts (Rehm et al. 2026).

Due to recent increases in non-native fish abundance and instances of hybridization with native fish FWP is proposing suppression of non-native trout (brown, brook, and rainbow trout) and hybrid cutthroat-rainbow trout in East Fork Bull River. FWP acknowledges that hybridization and non-native trout will always exist within the Bull River drainage. However, FWP believes that reducing non-native competition in an important adfluvial bull trout population and slowing the spread of hybridization and reducing its impacts to remaining genetically unaltered westslope cutthroat trout in the Bull River drainage is a realistic and important goal in the long-term effort to protect these native species. Fish capture techniques would include backpack electrofishing and weir traps already being operated by the bull trout downstream fish passage program. Suppression efforts could occur from July through November with no electrofishing occurring during bull trout spawning periods. Non-native fish >250 mm captured would be relocated to a nearby community fishing pond (Triangle Pond), conditions permitting.

Previous non-native fish suppression occurred in the East Fork Bull River from 2007-2009 in the lower 5 rkm. Fish capture techniques including backpack electrofishing, and weir and rotary screw fish traps. Just over 3,500 brown trout, 1,900 brook trout, and 60 rainbow trout (≥ 75 mm) were removed from the lower East Fork Bull River during the three years of suppression, resulting in decreases of 74% in brown trout and 61% brook trout biomass from electrofishing sections (Moran and Storaasli 2010). From 2010 through 2020, brown trout and brook trout densities remained around 70% less than pre suppression densities (Moran et al. 2022).

The proposed project would incorporate lessons learned from past similar actions in FWP's ongoing effort to conserve native bull trout and westslope cutthroat trout by reducing negative impacts from non-native fishes. FWP will continue to monitor the efficacy of the proposed project by tracking hybridization and the relative abundance of both native and non-natives fishes within the East Fork Bull River.

PURPOSE AND NEED

The intent of the proposed action would be to support the following FWP goals and objectives:

- Protected ESA listed threatened bull trout from hybridization and competition in one of the last remaining tributary strongholds for bull trout in the LCFR.
- Support substantial efforts by the upstream and downstream fish passage program to reconnect migratory native salmonid populations in the LCFR, specifically the Bull River drainage.
- Mitigate the loss of traits, through hybridization, that have evolved locally in westslope cutthroat trout.
- Retain the ecosystem role served by bull trout and westslope cutthroat trout, potentially avoiding adverse impacts to other organisms including insects, other fish, birds, and mammals that may result if hybrids and non-native fish replace native salmonids completely.
- Maintain westslope cutthroat trout as a valued sportfish in the area affected by the proposed project, avoiding unacceptable social and economic impacts associated with losing the opportunity to fish for them.
- Reduce the likelihood of federal Endangered Species Act (ESA) listing and protection of westslope cutthroat trout. ESA listing could limit public opportunities to fish for and otherwise interact with and enjoy this native fish species.

Protect Montana's state-designated fish, preventing further adverse impact to the affected populations and safeguarding against adverse impact to Montana's cultural values associated with the species.

ALTERNATIVES ANALYZED

Alternative 1: No Action

In addition to the proposed action, and as required by MEPA, FWP analyzes the "No-Action" alternative in the EA. Under the No-Action alternative, the proposed action would not occur. Therefore, no additional impacts to the human environment would occur. The No Action alternative forms the baseline from which the potential impacts of the proposed action may be measured.

Under the No Action alternative FWP would not suppress non-native trout and hybrid cutthroat-rainbow trout in East Fork Bull River. Without action, the bull trout and westslope cutthroat trout populations in the East Fork Bull River would likely continue to face increased hybridization and competition with non-native trout. These impacts would continue to threaten one of the last remaining adfluvial bull trout populations in the LCRF and the only remaining migratory population of westslope cutthroat trout. It is likely that without management action increased hybridization rates will spread throughout the Bull River drainage.

Alternative 2: Proposed Action

Under the Proposed Action, FWP would suppress non-native trout and hybrid cutthroat-rainbow trout in East Fork Bull River. The action would reduce non-native competition in an important adfluvial bull trout population and slow the spread of hybridization and its impacts to remaining genetically unaltered westslope cutthroat trout in the Bull River drainage. This action would support a realistic and important goal in the long-term effort to protect these native species. Fish capture techniques would include backpack electrofishing and weir traps already being operated by the bull trout downstream fish passage program. Suppression efforts could occur from July through November with no electrofishing occurring during bull trout spawning periods.

PUBLIC COMMENT AND FWP RESPONSE

FWP received substantive public comments on the Draft EA. A substantive public comment was defined as the identification of a specific issue or impact. The following provides the public comments received and FWP response(s).

Comment 1: *"Please accept this letter of support from Avista regarding the non-native fish suppression effort proposed by Montana Fish Wildlife and Parks (MFWP) for the East Fork Bull River (EFBR). Since 2001, under the Clark Fork Settlement Agreement (CFSA), Avista has worked collaboratively with MFWP and other agencies to enact many programs in support of native salmonid conservation in the Lower Clark Fork River (LCFR) area. Many of these efforts, ranging from tributary habitat enhancement to native salmonid fish passage, can be compromised by the deleterious effects of non-native salmonids on the native target species (e.g., Westslope Cutthroat Trout and Bull Trout), of the CFSA.*

Indeed, the documented impacts of non-native species on native salmonids in the LCFR prompted an Avista-led non-native fish suppression program on the EFBR, which was approved through the MEPA process in 2006. Conducting a non-native fish suppression effort in an open spawning tributary was recognized as a complicating factor. However, the adoption of selective passage at Avista operated weir-type fish traps and the genetic sampling of eggs from Brown Trout redds, enacted following 2007–2009 period of electrofishing removal of non-natives, helped address the open nature of the EFBR and helped slow non-native salmonid recolonization. Unfortunately, recent confirmation of Brook x Bull Trout hybrids and expansion of Brown Trout into middle reaches of the EFBR have shown that a re-set of a more intensive suppression effort is needed to preserve the critical native salmonid habitat of the EFBR.

We at Avista look forward to continuing our partnership with MFWP and strongly believe that the proposed action is needed to achieve the best results of our ongoing native salmonid conservation programs. Minimizing the impact of non-native fish in the LCFR not only supports CFSA programs, it also supports State and Federal management goals for both native salmonid species in the Bull River drainage and the LCFR area."

FWP Response: Thank you for your comments.

Comment 2: *"I would like to express my full support in Montana Fish Wildlife and Parks to move forward in eradicating non-native trout species in the East Fork Bull River. I would also like to see this program extended into the Vermilion River above China Gulch up to its headwaters. If you would like to have help in this effort, please feel free to reach out to me."*

FWP Response: Thank you for your comments.

Comment 3: *"I support the removal of non-native trout species from the East Fork Bull River."*

FWP Response: Thank you for your comments.

Comment 4: *"Travis ,where does this money come from for this project? What's trout unlimited view on this or does it even matter. You fellows are constantly pushing these west slope trout survival. Yet with are warming trend and the survival rate and temp for these west slope ,they are much more vulnerable. Browns and Brooks are survivalist. In are warm water lakes and rivers these fish will survive much better and they can hold there own against the more toothy fish like northern ,bass and perch. I really believe you should start putting these browns and brooks in some of our lakes like upper Thompson and lower maybe even Smith. Don't f--- up like they did with the salmon in flathead your still hearing the repercussions on that. Just saying."*

FWP Response: Thank you for your comments. All funding for the proposed project comes from mitigation funds under the Clark Fork Settlement Agreement. These funds are provided by Avista as part of their FERC operating license to offset impacts for continued operation of Noxon and Cabinet Gorge Dams. Trout Unlimited did not specially comment on the Environmental Assessment, however as a signatory of the Clark Fork Settlement Agreement, Trout Unlimited approved project funds at the last Management Committee meeting of the Clark Fork Settlement Agreement. FWP acknowledges that hybridization and non-native trout will always exist within the Bull River drainage. However, FWP believes that reducing non-native competition in an important adfluvial bull trout population and slowing the spread of hybridization and reducing its impacts to remaining genetically unaltered westslope cutthroat trout in the Bull River drainage is a realistic and important goal in the long-term effort to protect these native species

Comment 5: *"I wanted to relay a quick email in support of MFWP's proposed non-native fish suppression project for the East Fork Bull River. As a long time resident of the area and avid fisherman, I deeply appreciate our unique natural legacy that is exemplified by streams that support westslope cutthroat and bull trout. I realize the threat posed by non-natives and appreciate the efforts of MFWP in preserving our native fish by undertaking such efforts."*

FWP Response: Thank you for your comments.

Comment 6: *“This is a classic example of a few FWP biologists following their own idealistic ideas of how Montana should be.*

They even admit electro fishing the Bull River won’t work in the long run. But they want to use State money and do it anyway. This money could be used for many other useful fisheries projects!

The East Fork of Bull River — connects directly to the Clark Fork River and there is no barrier that prevents these same “rainbow, brown, and brook trout that they are killing to repopulate the East Fork in a few years. What a waste!

The fisheries people in Region one used to be a friend of the sportsman and did projects that benefited sportsman that paid their salaries. Now they are going off on their own agendas.”

FWP Response: Thank you for your comments. All funding for the proposed project comes from mitigation funds under the Clark Fork Settlement Agreement. These funds are provided by Avista as part of their FERC operating license to offset impacts for continued operation of Noxon and Cabinet Gorge Dams. FWP acknowledges that hybridization and non-native trout will always exist within the Bull River drainage. However, FWP believes that reducing non-native competition in an important adfluvial bull trout population and slowing the spread of hybridization and reducing its impacts to remaining genetically unaltered westslope cutthroat trout in the Bull River drainage is a realistic and important goal in the long-term effort to protect these native species

Comment 7: *“I’m going to have to object to the project because while your EA clearly states that bull trout are listed on the Endangered Species List, there is no mention of expected mortality in your by-catch of bull trout -- not by electroshocking, traps, or in handling. Mortality of endangered species requires an “incidental take” permit under the Endangered Species Act issued by the US Fish and Wildlife Service -- which is missing from your EA and, I suspect, doesn't exist.*

Because this is an apparent violation of federal law, the project and EA must be modified to indicate potential mortality and issuance of an incidental take permit from USFWS.

This is from your EA under the “Unique, endangered, fragile, or limited environmental resources section.

Bull trout are listed as a Threatened Species under the US endangered species act and classified as a Special Concernor Threatened by the Committee of Status of Endangered Wildlife in Canada. FWP and the American Fisheries Society have classified westslope cutthroat trout as a species of special concern, and the U.S. Forest Service and Bureau of Land Management have classified them as a sensitive species. The intent of the proposed project is to sustain native trout by reducing non-native and hybrid trout. Any impacts to native trout would be long-term, beneficial, and moderate. FWP is unaware of any other unique, endangered, fragile, or limited environmental resources in the affected area that would be impacted by removal or reduction of non-native fish species”

FWP Response: Thank you for your comments. Endangered Species Act consultation for this project is associated with Section 6 of the Endangered Species Act and the 2019 Biological Opinion on the effects of continued operation of the Clark Fork Hydroelectric Project on Bull Trout and designated Bull Trout critical habitat. Incidental take reporting for this project will be included in the annual Section 6 reporting and the Biological Opinion report as required by Terms and Conditions 15–18 of the 2019 Incidental Take Statement.

Comment 8: *"I am writing to provide a comment in support of the proposed action to suppress non-native trout in the East Fork of the Bull River.*

As a generally unsuccessful angler, I am excited by the prospect of increasing bull trout and westslope cutthroat populations in our waterways. It has always been a dream of mine to catch a bull trout, and the thought of their current population decreasing and livable habitat shrinking scares me that I will never be able to live this dream. Non-native fish are abundant throughout the rest of Montana, so I support keeping this current area flush full with native fish for as long as possible. I support your proposed action that expands habitat access for these native species.

Thank you for your efforts to keep native fish swimming in our waterways."

FWP Response: Thank you for your comments.

Comment 9: *"I am writing to provide a comment in support of the proposed action to suppress non-native trout in the East Fork of the Bull River.*

As an angler and avid user of Montana's public lands, I am excited by the prospect of increasing bull trout and westslope cutthroat populations in our waterways. Both species continue to experience shrinking habitat due to watershed alterations and competition from non-native fish. I support any action that expands habitat access for these native species.

Anglers have more than adequate opportunities to fish for non-native species throughout the state; any loss in those opportunities is well worth the gain for our native trout.

Thank you for the opportunity to comment."

FWP Response: Thank you for your comments.

Comment 10: *"I oppose any plans to remove fish from our rivers and lakes. So what you want to do is take fish you can catch and keep, and trade them for fish that are illegal to keep, destroying more fishing areas in Montana and encouraging more frivolous lawsuits over Bull Trout. I have never seen good result from Fish removal in this state, poisoning or electricution I have fished these areas and now there are no fish, why buy a fishing licence. I would like to see undisputed truth that these Fish are not native and where they came from. No to killing Fish, you know a lot of these Fish will not survive and some of them will be Bull Trout and Cutthroats, leave them alone..."*

FWP Response: Thank you for your comments. FWP states that one of the primary goals of its Fisheries Division is "to protect, maintain, and restore native fish populations and their genetic diversity." This goal is supported by FWP policy and state law, which require FWP to "implement programs that manage sensitive species in a manner that assists in the maintenance or recovery of those species, and that prevents the need to list the species under ESA and protect those already listed".

DECISION

Based on the environmental review provided in the Draft EA, and in accordance with all applicable laws, rules, regulations, and policies, FWP determined the proposed action (Alternative 2), will not have significant adverse impacts on the human environment associated with the proposed action and constitutes a reasonable and appropriate strategy to achieve identified objectives. Therefore, preparation of an EIS is

not warranted. FWP hereby adopts the Draft EA as final and approves the Alternative 2, the proposed action.

Sincerely,

A handwritten signature in black ink that reads "Amber Steed". The signature is written in a cursive, flowing style.

Region 1 Supervisor
Montana Fish, Wildlife & Parks