

***Friends of the Wild Swan
PO Box 103
Bigfork, MT 59911***

February 6, 2025

Hungry Horse-Glacier View Ranger District
PO Box 190340
Hungry Horse, MT 59919
Attn: Anthony Botello, Forest Supervisor
Sent via: <https://cara.fs2c.usda.gov/Public/CommentInput?project=56536>

Mr. Botello,

Please accept the following supplemental comments on the comprehensive river management plan (CRMP) for the Flathead Wild and Scenic River on behalf of Friends of the Wild Swan.

Attached to these comments are the most current bull trout redd counts in the Flathead river system as well as McNeil coring data that measures fine sediment in spawning streams. Redd counts in Big, Coal, Whale and Lodgepole creeks have significantly declined since 2023. Also, coring data indicates that Coal-Dead Horse at 37.3% and Granite at 35.9% are Threatened.

Per the Flathead Basin Commission Final Report 1991 (pages 158-159), a stream is considered *Threatened* as a bull trout and westslope cutthroat trout spawning and/or rearing stream when the percentage of fine materials in spawning gravels in any given year is greater than 35% and/or the substrate score (measure of imbeddedness) is less than 10. Both Coal and Granite exceed 35%.

To reiterate our February 4, 2025 comments: Measures should be taken now, not 5 years into the future, to halt the decline and methods developed to bring the conditions back to the baseline at time of designation before continuing to add more impacts from recreation.

/s/Arlene Montgomery
Program Director

Flathead bull trout spawning site inventories from 1980 – 2019 in index stream sections monitored annually. Identical sections of these eight index streams are counted each year and represent a portion of the total bull trout spawning in the drainage.

Drainage: Stream	Redd Numbers										
	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990
North Fork:											
Big	20	18	41	22	9	9	12	22	19	24	25
Coal	34	23	60	61	53	40	13	48	52	50	29
Whale	45	98	211	141	133	94	90	143	136	119	109
Trail	31 ^{a/}	78	94	56	32	25	69	64	62	51	65
Total	130	217	406	280	227	168^{b/}	184	277	269	244	228
Middle Fork:											
Morrison	75	32 ^{a/}	86	67	38	99	52	49	50	63	24
Granite	34	14 ^{a/}	34	31	47	24	37	34	32	31	21
Lodgepole	14	18	23	23	23	20	42	21	19	43	12
Ole	19	19	51	35	26	30	36	45	59	21	20
Total	142	83	194	156	134	173^{b/}	167	149	160	158	77
Flathead Drainage Monitoring Count	272^{a/}	300^{a/}	600	436	361	341^{b/}	351	426	429	402	305

Drainage: Stream	Redd Numbers										
	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
North Fork:											
Big	24	16	2	11	14	6	13	30	34	32	22
Coal	34	7	10	6	13	3	5	14	7	3	0
Whale	61	12	46	32	28	35	17	40	49	68	77
Trail	27	26	13	15	28	8	9	17	21	42	27
Total	146	61	71	64	83	52	44	101	111	145	126
Middle Fork:											
Morrison	45	17	14	21	28	9	39	35	30	44	40
Granite	20	16	9	18	25	4	12	22	37	26	18
Lodgepole	9	13	9	6	9	8	5	7	11	3	17
Ole	23	16	19	6	16	10	14	22	26	33	29
Total	97	62	51	51	78	31	70	86	104	106	104
Flathead Drainage Monitoring Count	243	123	122	115	161	83	114	187	215	251	230

Drainage: Stream	Redd Numbers										
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
North Fork:											
Big	12	12	11	15	37	40	21	23	8	9 ^{c/}	6
Coal	0	1	3	4	17	4	2	0	4	6	11
Whale	71	34	41	39	56	27	34	43	31	42	29
Trail	26	14	34	30	34	51	49	19	11	8	12
Total	109	61	89^{b/}	88^{c/}	144	122	106	85	54^{b/}	65	58
Middle Fork:											
Morrison	30	21	10	16	11	21	46	34	43	39	58
Granite	18	17	17	8	16	14	27	24	41	33	45
Lodgepole	12	10	6	16	19	17	4	10	20	12	15
Ole	21	21	14	16	31	29	42	34	32	40	53
Total	81	69	47^{b/}	56^{c/}	77	81	119	102	136^{b/}	124	171
Flathead Drainage Monitoring Count	190	130	136^{b/}	144^{c/}	221	203	225	187	190^{b/}	189^{c/}	229

Drainage: Stream	Redd Numbers										
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
North Fork:											
Big	8	7	1 ^{a/}	4 ^{c/ d/}	9	13	18	4	14	28	30
Coal	23	4	9	NS	4	5	8	12	5	28	22
Whale	34	35	31	27	29	35	30	56	32	43	35
Trail	23	5	9	11	17	18	7	19	34	23	23
Total	88	51	50	IC	59	71	63	91	85	122	110
Middle Fork:											
Morrison	54	52	54	63	32	34	40	39	21	26	33
Granite	27	37	29	38	24	31	28	28	14	30	9
Lodgepole	12	11	14	9	8	9	--	7	15	9	19
Ole	44	32	35	31	18	20	3 ^{b/ c/}	26	11	21	21
Total	137	132	132	141	82	94	71	100	61	86	82
Flathead Drainage Monitoring Count	225	183	182 ^{d/}	IC	141	165	134 ^{IC}	191	146	208	192

Drainage: Stream	Redd Numbers										
	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
North Fork:											
Big	12										
Coal	2										
Whale	17										
Trail	55										
Total	86										
Middle Fork:											
Morrison	38										
Granite	17										
Lodgepole	7										
Ole	19										
Total	81										
Flathead Drainage Monitoring Count	167										

^{a/} Counts may be low due to incomplete survey

^{b/} High flows may have obliterated some redds

^{c/} Minimum count due to poor conditions during survey

^{d/} Count is low due to impaired access to the index reach

^{IC} Incomplete Count

Table _____. Median percentage of streambed material < 6.35 mm in McNeil core samples collected from spawning areas in Flathead Lake tributary streams from 1981 through 2023.

Stream	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990
Big	23.8	32.6	28.2	27.8	28.7	21.6	29.1	40.4	48.4	53.4
Coal-DH	34.1	40.2	39.3	32.8	36.4	34.8	40.8	39.2	37.8	42.1
North Coal	--	--	--	--	34.9	29.4	30.2	39.8	37.8	32.8
South Coal	--	--	--	--	36.0	31.8	31.4	32.1	36.9	33.6
Whale	25.1	31.8	32.6	29.5	22.5	26.0	28.9	37.2	35.3	--
Trail	25.7	36.1	27.2	28.1	26.2	25.0	27.4	30.0	--	34.6
Granite	--	44.6	--	--	--	49.0	41.3	45.5	45.2	33.0
Cyclone	--	--	--	--	--	--	--	--	31.0	31.0
Langford	--	--	--	--	--	--	--	--	--	--
Challenge	--	--	--	--	--	--	32.5	40.9	43.5	33.0
Meadow	--	--	--	--	--	--	--	--	--	--

Stream	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000
Big	32.9	37.4	37.2	34.5	32.2	30.0	31.1	32.2	33.1	31.4
Coal-DH	36.1	35.8	35.5	32.6	37.5	38.2	36.4	37.4	37.6	36.5
North Coal	32.6	33.5	30.0	25.5	30.8	29.6	30.1	30.9	31.4	31.0
South Coal	32.7	34.0	28.4	26.2	28.8	30.1	29.2	30.2	30.8	30.0
Whale	34.2	32.2	33.4	29.5	32.6	31.4	30.9	31.3	31.9	30.8
Trail	33.7	29.5	33.6	24.8	29.5	34.5	29.8	30.2	30.0	29.7
Granite	37.2	41.4	36.0	33.5	34.8	33.6	32.5	32.0	35.1	34.7
Cyclone	--	--	--	--	33.1	31.6	33.8	32.6	35.2	35.2
Langford	--	--	--	--	--	--	--	--	--	34.1
Challenge	38.2	41.9	36.8	34.6	37.9	38.1	36.4	35.9	33.1	35.1
Meadow	--	--	--	--	--	--	--	--	38.1	38.1

Stream	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
Big	32.1	30.1	33.4	33.9	32.6	32.9	31.8	32.3	31.4	28.9
Coal-DH	37.6	38.0	39.4	41.2	40.1	41.3	40.1	39.6	41.5	31.6
North Coal	31.8	32.3	31.0	32.3	32.0	32.8	31.5	31.0	30.8	32.4
South Coal	30.9	31.4	30.2	31.9	31.4	32.0	33.6	31.2	32.3	33.0
Whale	31.6	30.9	32.1	34.0	32.6	33.1	35.0	34.2	31.2	35.7
Trail	30.4	29.6	30.3	30.6	29.7	30.2	31.4	30.8	29.6	31.8
Granite	33.7	34.2	35.1	37.8	36.1	36.5	37.0	35.4	34.6	35.2
Cyclone	35.2	33.9	34.7	35.1	34.8	33.8	34.6	32.9	33.1	32.2
Langford	36.0	38.3	41.4	43.1	41.9	42.3	44.1	45.0	44.0	45.6
Challenge	36.0	35.4	36.0	36.6	34.7	35.1	37.8	34.9	33.1	34.0
Meadow	39.6	39.7	43.2	43.9	40.0	40.6	41.3	43.0	43.6	44.0

Stream	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Big	27.4	37.4	35.5	36.6	30.9	33.7	25.0	28.0	--	31.1
Coal-DH	33.8	32.8	35.5	35.8	29.5	34.0	32.6	31.6	34.9	32.8
North Coal	31.9	30.9	31.2	31.9	30.4	31.8	30.2	31.3	--	32.4
South Coal	32.6	31.3	33.5	33.7	31.8	32.6	31.4	32.1	--	33.0
Whale	--	40.4	36.2	35.1	32.5	35.7	34.2	33.8	--	34.4
Trail	--	31.6	27	28.8	29.8	30.2	31.0	30.1	--	31.2
Granite	--	36	34.1	34.7	33.1	35.3	34.2	35.6	--	36.0
Cyclone	33.4	35.1	36.8	--	--	--	--	--	--	--
Langford	46	44.4	45.4	--	--	--	--	--	--	--
Challenge	--	33.2	34.7	35.1	33.1	35.6	35.1	33.8	--	34.1
Meadow	44	43	42.1	--	--	--	--	--	--	--

Stream	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Big	30.6	32.4	--							
Coal-DH	37.0	38.3	37.3							
North Coal	33.1	31.9	--							
South Coal	32.3	30.5	--							
Whale	31.6	32.7	--							
Trail	27.7	30.3	--							
Granite	35.9	--	--							
Cyclone	--	--	--							
Langford	--	--	--							
Challenge	33.1	--	--							
Meadow	--	--	--							

[illegible]