



September 13, 2019  
Chris Prew  
Recreation Project Manager  
650 Wolfpack Way  
Kalispell, MT 59901

**RE: Comments on the Comprehensive River Management Plan (CRMP) for the Flathead River.**

Dear Mr. Prew,

Please accept the following comments from Trout Unlimited (TU) and Montana Trout Unlimited (MTU) on the Comprehensive River Management Plan (CRMP) for the Flathead River. We offer our comments after reviewing the proposed action documents and supportive information.

The mission of Trout Unlimited is to conserve, protect and restore coldwater fisheries and their watersheds. Trout Unlimited represents 300,000 members and supporters nationwide and remains one of the nation's oldest coldwater fisheries conservation organizations. In Montana we have 4,500 members and 13 local TU chapters that have a passion for the conservation of the coldwater fishery the Flathead River provides. The Flathead Valley Chapter of TU is submitting their own additional comments on this issue.

**Overview of Proposed Action**

According to the scoping cover letter *"The purpose and need for the Flathead Wild and Scenic (WSR) CRMP is to protect and enhance the outstandingly remarkable values (ORV) identified in the original designation, and to update existing river management plans required to maintain compliance with the WSR Act."* Fish and supportive fisheries habitat on the Three Forks of the Flathead is considered one of the ORVs. Therefore, review of baseline fisheries population data, potential threats to the fishery and its component species and future management and monitoring objectives should be integral to the ongoing CRMP process.

Specifically, bull trout and westslope cutthroat trout are two threatened and sensitive species in the Flathead River system. These two species should have special recognition and desired conditions in the System-wide Proposed Action section of the CRMP. Additionally, water quality would be considered part of the "supportive fisheries habitat" mentioned in the ORV and should also have monitoring and indicators mentioned in the Proposed Action. In the scoping document released, both fisheries, except in the South Fork desired conditions, and water quality

have no proposed monitoring or indicators. Instead, the Forest relies on the Montana Department of Fish, Wildlife and Parks and the Montana Department of Environmental Quality to make sure fisheries management and water quality standards are met. Considering how fisheries and water quality fall under the ORV identified in the original WSR designation, TU believes the Forest should take responsibility and have desired conditions and indicators for fisheries and water quality on all three forks in the CRMP. If the Forest is going to manage the WSR segments, that should include the entire ecosystem.

### **South Fork Desired Conditions**

The South Fork is the one fork that has specific fisheries desired conditions for bull trout. It states “*Bull trout populations are sustained at a level that can accommodate catch and release fishing per current MFWP fishing regulations...*” While TU agrees with this desired condition, we believe the desired condition should to not only sustain, but increase and protect the bull trout population. Additionally, TU believes this desired condition should pertain to all three forks and if bull trout are going to be mentioned, there is no reason the same desired condition should not pertain to westslope cutthroat trout.

### **Conclusion**

The Flathead River is a one of a kind system with fisheries and water quality ORVs. While we understand recreation and use will play a large role in this CRMP, we urge the Forest to make sure the fishery and aquatic ecosystem does not take a back seat to recreation and use. In the future there will be increasing stressors and limiting factors for the ecosystem, including climate change and increased use. It is important this is considered and planned for in this CRMP. Thank you for your consideration and we look forward to working with the Forest moving forward.

Sincerely,

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