

From: Wade_Fredenberg
Sent: Saturday, February 06, 2010 11:05 AM
To: Hertz, Judi
Subject: Comment on Bitterroot Subbasin Plan

Congratulations to the Council in continuing to pursue true basinwide planning efforts. We had previously pointed out that the Columbia Basin Subbasin Planning effort is not truly comprehensive so long as major portions of the Montana headwaters were excluded. The Blackfoot and Bitterroot plans will pick up major portions of the previously missing habitat, but we continue to note that the mainstem Clark Fork in Montana remains unplanned.

The Montana water Trust and coauthors are also to be congratulated for assembling a meaningful and important contribution to the NWPCC's Subbasin Planning effort. The document is well-written and edited and serves as a useful platform to be used for more comprehensive subbasin planning efforts in the Bitterroot. That said, the Ecological Services program in the Fish and Wildlife Service (FWS) is primarily responsible for recovery of ESA listed species, including the threatened bull trout. We wish to offer the following constructive comments, primarily from the point of view of the Montana bull trout coordinator, and specific to issues related to native fish recovery in the Bitterroot. These comments are not meant to encompass the entirety of FWS comments nor do they necessarily represent blanket FWS positions on issues other than recovery of bull trout in western Montana.

It was disappointing, upon review, to realize that such an important and comprehensive undertaking as development of this subbasin plan occurred without any direct contact, review, or involvement of the FWS ES and bull trout recovery program. The Service is not listed as a Partner in the development or implementation of the plan and has not participated in any meaningful way in the preparation of this document. Nevertheless, we hope these comments are useful and are accepted in the constructive context in which they are intended.

Overall, we believe the document significantly understates the importance of the listed status of bull trout as threatened under the ESA. For Federal agencies and those nonfederal partners seeking Federal permits or funding, actions that lead to the recovery of bull trout are not optional, but are a matter of law. As such, the FWS Draft Bull Trout Recovery Plan is meant to represent the best available science on the approach to pursue recovery and is more than a simple advisory document, especially to Federal agencies. It should be more fully integrated into this Subbasin Plan.

We also believe the document fails to fully recognize the existing science provided in the Draft Bull Trout Recovery Plan. With the removal of Milltown Dam and the increasing connectivity within the Clark Fork watershed all the way to Lake Pend Oreille, the Service believes it's important that restoring historical connectivity for bull trout populations in the Bitterroot River core area be emphasized. The plan, to the extent it goes into detail, seems to do that. We agree with and support the prioritization of bull trout and westslope cutthroat trout as aquatic focal species. We also believe the *Aquatic Working Hypothesis* well as Vision and Objectives (pages 15-17 in Executive Summary) are sound and supportable.

In the Inventory portion of the Bitterroot Subbasin Plan (page 9), it is stated that "no critical habitat is designated for bull trout in the Bitterroot Basin." That's not true, as most of the mainstem Bitterroot River as well as significant portions of tributaries Burnt Fork, Fred Burr, Mill, Blodgett, Skalkaho, and Sleeping Child Creeks, as well as portions of the East Fork and West Fork were designated as bull trout critical habitat in the 2005 Final Rule. That designation is currently being revisited and a new proposed rule, published in the Federal Register January 14, 2010 (and currently open for public comment), proposes to significantly expand that 2005 designation to additional waters.

In general, the Inventory section of the Bitterroot Subbasin Plan provides a good overview of the various key plans, policies and partners that would be involved in native fish recovery in the subbasin, but the subbasin inventory by 6th code HUC (Table 3.1) is little more than a checklist of ongoing activities. The authors acknowledge as much, in the closing paragraph of the Project Assessment (page 28), where they note: "Assessing the effectiveness of these projects.....is difficult.....however, current studies.....suggest continuing negative trends in the various limiting factors identified for focal aquatic species."

The Guiding Principles expressed in the Management Plan portion (pages 8-9) are broad ecological platitudes and, unfortunately, little more specificity is captured in the aquatic objectives or management strategies for bull trout presented on pages 14-15 (Tables 3.2-3.6). These could apply to any stream, anywhere in the range of bull trout.

Figure 3.1 (and Tables 3.17 and 3.28) are meant to draw together all of this into a meaningful strategy for recovery of native aquatic focal species in the Bitterroot Subbasin. While certain 6th code HUCs are emphasized, the map and Tables really do little more than emphasize that conservation is needed in the mostly unroaded and unmanaged headwaters and active restoration is needed

throughout the upper watershed and Lolo Creek drainages. In some regards, this does accurately reflect the dire conditions for bull trout in the Bitterroot River subbasin. However, substantially more fine-tuning will be needed before this subbasin plan can make a meaningful contribution in directing projects in that regard. The list of "Near Term Opportunities" presented on page 45 probably comes closest to meaningfully identifying actual strategies for implementation, but that list is not comprehensive and omits many important watersheds necessary for bull trout recovery. We would urge that this approach be expanded upon, with an eye toward identifying "Near Term Opportunities" in all proposed critical habitat described in the recent Proposed Rule.

The effort in Chapter 5 (pages 82...) to identify data gaps is also a commendable start. However, as discussed in the preceding paragraph, should be expanded with an eye toward all proposed critical habitat described in the recent Proposed Rule.

Finally, the entire Management Plan portion of the document is weakly supported by citations and references. A substantially greater body of existing work needs to be incorporated in this portion of the Plan.

In conclusion, the Service does not mean to denigrate these efforts. The framework developed is a worthwhile platform upon which to build, but the lack of specificity and meaningful analysis in the Draft Management Plan renders it of limited use for making meaningful management decisions about how to prioritize projects designed to recover native aquatic focal species in the subbasin. We appreciate the opportunity to comment on this planning effort.

Respectfully submitted,

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