

## **Comment of Trout Unlimited in Response to the ISRP Review of the Blackfoot Sub-basin Plan**

Trout Unlimited has been a lead partner in the compilation of the Blackfoot Sub-basin plan, and, as such wishes to submit the following comments about the Review of the Independent Scientific Review Panel.

The ISRP comments raise a number of legitimate criticisms about the proposed Blackfoot Sub-basin Plan (“Plan”). The primary purpose of this comment is to describe how Trout Unlimited and its planning partners propose to modify the plan to address those criticisms.

Thematically, the most compelling criticisms two general weaknesses in the plan: (1) The failure to include information that illuminates existing restoration priorities and monitoring and evaluation efforts; and (2) the failure to include a spatially specific assessment of native salmonids within the body of the plan. There is considerable overlap between these two areas, but within each of these categories, there are a number of discreet expressions of concern. This comment will address each of those separately.

- 1. More Discussion of restoration priorities and historic and future evaluation and monitoring.**
  - A. The Plan fails to provide adequate information on population status for the native salmonid species.** This is a fair criticism. The partners will modify the Plan to include more information on the historic data-gathering effort, and will provide a more complete summary of the abundance data that has been gathered for both bull trout and westslope cutthroat trout. In addition, the Plan fails to specifically note the extent westslope cutthroat genetic testing and analysis that has occurred. We will provide more information within the text of the assessment to correct this. In addition, we will provide more detailed information on the core bull trout areas and their relationship to the bull trout restoration plan under the ESA.
  - B. The Plan fails to prioritize restoration strategies.** This will be more fully addressed with the completion of the viability assessment to the 6<sup>th</sup> HUC, insofar as that assessment will inform the management plan. That said, the ISRP comments reflect an impression that there has been little done to date to guide the restoration efforts. Given the lack of specific discussion in the Plan about the past and existing prioritization schemes, that’s a fair concern. Because there has been a considerable amount done, the text of the plan—both within the inventory and within the management plan, will be modified to discuss the current prioritization approach and its relationship to restoration efforts.
  - C. The Plan does not enunciate a Monitoring, Evaluation, and Research Plan.** This criticism is fair, given the cursory amount of information provided in the Plan about the existing monitoring and evaluation effort. We will substantially modify section 5.4 to more fully describe the long-term biological and habitat

monitoring efforts and describe how that information is currently used, especially as to the native salmonid species.

2. **The Plan needs to provide a more spatially specific assessment of native salmonids.** This criticism goes to the issue of the admittedly incomplete viability assessment of salmonids to the 6<sup>th</sup> code HUC in the Plan reviewed by the ISRP. The fisheries working group expects to complete this part of the assessment this spring. Not only will this better inform the threats section of the assessment, but it will better clarify the priorities for restoration strategies in the management plan.

Inherent in this larger criticism are a number of more discreet criticisms of the plan. Below are the most pressing of those concerns.

- A. **The Plan is insufficiently transparent as to the limiting factors were determined.** Implicit in this criticism is the perception that most of the descriptions within the native salmonid assessment are grounded largely in subjective judgment and “professional opinion.” The perception is understandable, given the lack of discussion in the Plan about the extent of data that has been gathered within the basin and how it has been used. We will provide much greater detail as to the extent of biological and habitat assessment that has been done and how that informs the assessment section of the plan. Of course, this will be enhanced by the completion of the 6<sup>th</sup> Code HUC viability assessment.
- B. **The “Conservation Target” approach in which native salmonids are listed as a single target rather than as two distinct focal species makes it difficult to evaluate from a scientific perspective.** The final plan, while maintaining the basic conservation targets, will provide more specific assessments as to each of the two native salmonid species.

In addition to these modifications, the planners will provide additional information within the assessment and the management plan to answer some of the criticisms within the ISRP review. Also, we have reviewed comments from the United States Fish and Wildlife Service concerning the Plan’s coverage of bull trout and will address the focus of those comments in our modifications of the plan. Finally, where appropriate, the Plan will include a number of additional appendices to more fully inform the specific descriptions and proposals within the text.

Respectfully submitted,

Stan Bradshaw, Counsel  
Trout Unlimited, Montana Water Project  
PO Box 412  
Helena, MT 59624  
406-449-9922