



Main Office PO Box 7186 Missoula, MT. 59807

4 June 2012

Leo Rosenthal
Montana FWP, Region 1
490 North Meridian Road
Kalispell, MT 59901

Re: Swan Lake draft EA for lake trout removal

Leo,

Thanks for the opportunity to comment on the draft EA for continuing the experimental efforts to remove lake trout from Swan Lake. Montana TU and its local Flathead Valley Chapter view this project as essential for conservation of bull trout and kokanee in Swan, Lindbergh and Holland Lakes and the river system, as well as for local cutthroat and rainbow trout populations. The TU community elsewhere also considers this an important project because of its potential for informing how we deal with similar challenges elsewhere in the West.

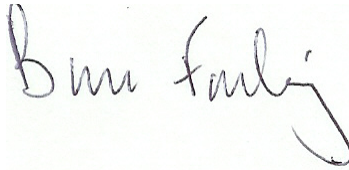
We commend FWP's efforts with its partners since the effort to address lake trout commenced in 2005 at Swan Lake. We especially value the quality and level of commitment dedicated to the removal efforts, as well as the monitoring and analysis associated with it. Your role in particular has been exemplary. Picking fish out of nets is not exactly the apex in a fishery professional's career, so you should know your effort is greatly appreciated. We have learned a lot in a short period, and FWP's efforts have been key.

We support the action alternative to continue the experimental gillnetting, but with one tweak: We recommend it be a 10-year program, starting in 2012, with the second five years being conditional after a five-year review in 2017. At the last Swan Valley Bull Trout Working Group Meeting much discussion ensued as to how long a project the EA should cover. Suggestions included three more years, 10 years including the three that have already occurred, five years starting in 2012, and 10 years starting in 2012. We believe 10 years with a five year review benchmark is appropriate because it

allows for a course correction half-way through the project's life, but won't require a potentially redundant MEPA document after five years, should the decision remain to continue the project. We also believe it allows for more than a minimum period to detect and establish a relationship with any responses in the bull trout population. We agree that if a course correction involves new methods or potential effects that haven't been identified or analyzed that a new EA might be necessary at that time. However, short of that, having this EA cover a 10-year project period would obviate the need for another EA at the end of the first five years, should the decision be made to continue the project.

Again, thanks for the opportunity to comment. We look forward to a decision to continue this important project.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Farling". The signature is written in a cursive style with a large, sweeping 'B' and a long, trailing 'g'.

Bruce Farling
Executive Director

cc. Flathead Valley Chapter TU
Swan Valley Bull Trout Working Group