

27 July 2013

Jeff Trandahl Executive Director National Fish and Wildlife Federation 1133 15th Street, NW, #1100 Washington, D.C., 20005

Re: Yellowstone cutthroat trout as Keystone Species

Dear Mr. Trandahl:

Montana Trout Unlimited, which represents 3,600 conservation-minded anglers in the Big Sky State, urges the National Fish and Wildlife Federation to designate Yellowstone cutthroat trout a "Keystone Species."

As one of two cutthroat subspecies native to Montana, and one whose historical range in our state formerly included the headwaters of the Yellowstone River down to the Tongue River in eastern Montana, this fish is an essential part of the natural heritage of our state. In addition, Yellowstone cutthroat trout are important to the angling traditions in Montana, supporting an economically important sport fishery in the Yellowstone River and some of its key tributaries, including the Shields River.

Yellowstone cutthroats still occupy an estimated 40 percent of their multistate historical range, and they are one of the iconic species that has long distinguished Yellowstone Park. Genetically unaltered Yellowstone cutthroats still occupy about 20 percent of their historical range. The fish's role in the park as an ecosystem linchpin is well established. It is therefore critical that conservation efforts for this fish be bolstered, which designation as a "Keystone Species" would help.

Importantly, several multi-interest technical and management teams are already in place to further conservation, including the Interagency Yellowstone Cutthroat Trout Work Group (which we participate in); a partnership between Yellowstone National Park and several conservation NGOs, including Montana TU and its national organization; and the Western Native Trout Initiative, which also includes our parent organization. Well-developed conservation blueprints and MOUs guide the work of these collaborative efforts. This helps ensure that funding

for restoration, conservation, research and monitoring is coordinated and efficient. Refinements in prioritizing conservation populations and actions are currently being developed by the YCT Work Group with assistance from agency researchers and private conservation entities, such as the Wildlife Conservation Society, TU and others. The data on conservation status, including existing range, genetics and population trends are robust, and being regularly added to and monitored.

The Yellowstone cutthroat is an important fish species in Montana and the other western states they historically occupied. They are an essential component of the fauna of Yellowstone National Park and an important part of our angling heritage. Designating them a Keystone Species and investing in their conservation fits well within NFWF's mission to conserve important native fish and wildlife species.

Thank you for your consideration.

Sincerely,

Bruce Farling
Executive Director