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June 15, 2024

Leo Rosenthal and Mike Hensler  
Montana Fish, Wildlife & Parks  
490 N Meridian Road  
Kalispell, MT 59901

Dear Leo Rosenthal and Mike Hensler;

The Flathead Audubon Society (FAS) has reviewed the draft Environmental Assessment for Lake Trout Suppression at Swan Lake to improve Bull Trout and Kokanee Salmon populations and would like to offer comments.

First and foremost, FAS strongly supports the proposed action to conduct Lake Trout suppression. The need for this action is compelling and ably described in the EA. Swan Lake has been one of the last strongholds for Bull Trout. Lake Trout expansion in this ecosystem is unacceptable. We agree that the proposed action is appropriate and urgent. We also understand the difficulty of suppression using sinking gill nets and therefore agree with the open-ended timeframe with adaptability to learn over the years.

While we do support the proposed action, we have several considerations to improve the Environmental Assessment. First, we feel more thought is needed on how Swan Lake is a part of the overall Swan Valley ecosystem. The Environmental Assessment only details the lake, thus overlooks the connected ecosystem. Bull Trout have been part of the ecosystem for thousands of years and occupy tributary streams during a part of their life cycle. Conserving this species would have indirect benefits by means of macroinvertebrate consumption, fish predation, and themselves being consumed by species found along the Swan River and tributaries. In other words, maintaining Bull Trout has intangible benefits to numerous other native species. At the same time acknowledgment needs to be given to the connectivity of Swan Lake with Holland Lake and Lindbergh Lake. Lake Trout will presumably continue to occupy those lakes and some migrants could frustrate efforts in Swan Lake. We recognize this is currently beyond the scope of the project but caution that monitoring those Lake Trout populations might be necessary.

Second, we note the Environmental Assessment fails to consider potential adverse impact of sinking gill nets to Common Loons and Grebes. These species could potentially become entangled in sinking nets. Although the proposal does mention only sinking nets greater than 60 ft deep (page 39), we recall that shallow nets were set during the 2009-2016 effort in order to capture spawning Lake Trout in fall. We recommend mitigation measures that align with the 2009 Conservation Plan for the Common Loon in Montana (prepared by the Loon Working Group which includes FWP). No nets should be set within 300 yards of Loon nests and nor allow the work boat to drift within that same area, even when idling and processing fish. Please



also ensure all nets are more than 60 feet during their breeding season of May 1 through August 1. The Montana Common Loon Working Group can inform staff on current nest locations. While Grebes do not have any specific conservation plan, avoiding gill nets set at less than 60 feet depth is just good practice.

Third, we recommend the Department slightly modify its goal of securing more funding after seven years based on population responses of Lake Trout, Bull Trout and Kokanee Salmon. Given the difficulty of the work and lessons learned from the 2009-2016 project, it is likely that the only detectable change in seven years will be a reduction of Lake Trout density. Bull Trout and Kokanee Salmon recovery will not begin until the Lake Trout density significantly declines and then will require several generations before detectable. It would be tragic to suspend the project before these species have a chance to respond.

Fourth, we urge any equipment (boats, nets) brought in to the project from other states undergo inspection to be sure they are not inadvertently spreading Aquatic Invasive Species. This is standard policy but we did not notice this mitigation measure in the Environmental Assessment.

Thank you for your consideration.

A handwritten signature in black ink that reads "Darcy Thomas". The signature is written in a cursive, flowing style.

Darcy Thomas, President  
Flathead Audubon Society Board of Directors