



Stan Bradshaw

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Montana Water Project

January 5, 2011

Lynn Palensky
Northwest Power and Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204-1348

Re.: Attached Blackfoot Sub-basin Plan, with Modifications

Dear Ms. Palensky:

Attached is the Blackfoot Sub-basin Plan as modified in response to comments from the Independent Scientific Review Panel (ISRP). The modifications all addressed concerns about aquatic resource issues.

The ISRP comments focused on 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. The modifications to the plan focus on the first of those issues. In addition, the modifications attempt to address some of the concerns expressed by the U.S. Fish and Wildlife Service.

Specifically, the modifications:

- a) Provided more detail in the assessment about the status of bull trout under the Endangered Species Act, and updated the text to reflect recent federal actions on the designation of critical habitat for bull trout (pp.41-44);
- b) Provided a more detailed description of the baseline data-collection efforts as to: native salmonid populations and life histories; habitat assessments; investigations of westslope cutthroat trout genetic composition within the Blackfoot sub-basin; limiting factors identified on 182 streams throughout the basin (with a description of those streams at Appendix A), and other ongoing aquatic studies within the sub-basin (pp.79-97);
- c) In the inventory, more fully describe the conservation and monitoring efforts that have occurred in the sub-basin, and expands the gap assessment to describe some of the more

challenging aspects of the restoration effort (p. 194 and pp. 210-211); and

- d) Substantially modified Part 5.4 on monitoring, evaluation and research, to fully describe the existing monitoring and evaluation effort (pp.244- 245).

In addition to the textual changes described above, we have added four additional appendices—J through M—to more fully incorporate the existing restoration efforts into the body of the plan.

As to the issue of providing a spatially specific assessment, as the additional material indicates there has been considerable effort made to gather and evaluate baseline data on 182 tributaries within the basin. That said, the fisheries working group agreed that it would be desirable to extend the assessment to the sixth code HUC. Last spring, two of the fisheries working group embarked on pulling together sixth code maps for the sub-basin, using both the actual collected data and data from the various federal agencies that was based on a GIS model. They found serious inconsistencies between the modeled data and the collect data that will require a stream-by-stream review to resolve the inconsistencies. The field season arrived before they were able to conduct such a review. They intend to try to complete the viability assessment to the sixth code this winter.

Finally, we have added additional references to Part 6.0, References, to reflect the additional material added to the text.

In closing, while the modifications do not address all of the concerns of the ISRP, they more fully describe the ongoing restoration and monitoring effort in the Blackfoot sub-basin and therefore should measurably improve the plan over its initial draft.

Don't hesitate to call me if you have any questions.

Sincerely,



Stan Bradshaw

c.c. Gary Burnett
Ryen Aasheim