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Don Skaar
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Montana FWP
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Helena, MT 59620-0701

Re: Statewide fishery management plan

Dear Don:

Montana Trout Unlimited appreciates the opportunity to comment on the proposed Statewide Fishery Management Plan. Montana TU represents 3,400 conservation-minded anglers organized among 13 chapters in the state. TU members recreate in most of the cold, cool and warm-waters covered in the plan. We support the department's goal to achieve management of abundant and sustainable wild and native trout populations in Montana, as well as its objectives to provide a variety of sportfishing opportunities across the state.

As FWP staff knows we have been dubious about the need for a statewide fishery management plan. We appreciate department staff being open-minded and professional when we've expressed this skepticism. None of our observations are meant to indict the high quality professionalism FWP's fishery staff have long exhibited. We continue to believe Montana FWP has some of the best fishery professionals in the country. Our doubts about the value of the plan, however, do not stem from a belief that management plans can't be helpful, but instead they result from the inability, in our view, of the department to clearly articulate why the plan is needed and how it will better inform management on the ground. Our concern has been heightened because plan development required diversion of existing staff time from other pressing tasks. The draft hasn't alleviated these doubts, however we do applaud the agency for developing a resource that catalogues in one place the existing management direction we infer FWP has intended for most of the state's waters.

Shortcomings with objectives of the plan

To us a "plan" implies measurable objectives, an enumerated and systematic description of the current status of the fishery in each water, and a description of **specific** strategies, benchmarks and goals that **will** occur in the future to meet objectives. Instead, the plan largely describes only what is currently occurring in terms of species presence-absence, identifies a generalized management strategy, lists a prescription for management that is intended to occur in the next six years, and in some cases it identifies unspecified opportunities that *might* occur to conserve or improve a fishery. Again, the plan is not without value. It is an important as a survey of the status quo. However it does not include much information on population trends, angler pressure, numerical goals for the future, or, importantly, any commitments about specific future actions that will conserve or improve a fishery or satisfy projected angling demands. Further, it seems to not be as adaptive as it could be should new information emerge that demonstrates the description or objective for a particular water mandates changes.

Highlight Blue and Red Ribbon Fisheries

It would be beneficial if the plan incorporated Montana's long-standing "blue ribbon" and "red ribbon" fishery designations -- perhaps modified to reflect current conditions and angling demands -- so that anglers could get a better sense of management priorities. These designations have long been part of angler vernacular in the state, and they tell the public that these are the top waters for sportfish management.

Highlight Wild Trout Management

Because of its focus on the status quo, we think it would valuable if the plan included a detailed description of wild trout management, where it came from, how successful it's been, and why it separates trout management in this state from all other states. The angling community in Montana is constantly in transition. Anglers leave, new ones move here or visit. Many don't know about the priority or value of the wild trout management that makes trout fishing in Montana an iconic pursuit. FWP could do no wrong highlighting this in the plan and blowing its horn a little about this signature achievement. Further, the plan should include a description on the objectives of its hatchery program, perhaps reviewing the goals of each hatchery unit and the destination and purpose of the fish raised there.

Important waters with existing management plans haven't been stitched into the statewide plan

Rather than simply say that important plans for key waters such as Flathead Lake and the Flathead River system, or the upper Missouri River reservoir system, are incorporated into this plan, FWP should describe in the statewide plan how the goals and objectives for these waters and other waters with existing plans compliment and don't contradict the strategies for connected waters. For example, it is clear fishery management in the lake heavily influences the Flathead River system and its tributaries.

And it is clear that fishery objectives in the Missouri River upstream and below the reservoirs are heavily influenced by the objectives in the existing reservoir plan. What is less clear is what occurs if management objectives for waters in this plan cannot be achieved because of the ongoing management for waters with existing plans. It's a little confusing.

Native Fish

The Department makes clear that native fish species are a priority when it states that its goals are to “Protect, maintain, and restore native fish populations, their habitats, life cycles, and genetic diversity to ensure stewardship of native species and to ensure angling opportunities whenever possible.” Unfortunately it then equivocates by saying “Tradeoffs in fisheries management are sometimes necessary when two or more species exist in a water body” -- without analyzing what the tradeoffs might be or what criteria will be used to protect native fisheries over introduced species. Further, there is nothing in the plan, for instance, that clearly states an unequivocal commitment to control lake trout, northern pike or in some instances brown, rainbow or introduced Yellowstone cutthroats in waters identified by either the Fish and Wildlife Service as critical habitat or FWP as core habitats for important native fishes such as bull trout and native cutthroat trout. Essentially, a review of many specific waters in the plan reveals that native fish conservation activities will occur “where practical,” or “where feasible.” There is no description of when it is “practical” or “feasible.” Nor are any specific waters identified where suppression activities to benefit native fish are “practical” or “feasible.” Further, we note that in some waters where species such as brown trout are identified as problematic for native species, the plan commits only to “identifying opportunities” for suppression. This is not the same as committing to implementing activities aimed at benefiting native species. Moreover, there is nothing in the plan that clearly articulates a goal that imperiled species that have merited ESA listing or identification as a candidate species – bull trout, pallid sturgeon, white sturgeon, arctic grayling – will be managed so that they can be recovered for de-listing. Every reference to waters with bull trout seems to focus on maintaining the status quo. But the status quo means a continued downward trajectory.

Finally, because the descriptions of many waters, especially those with bull trout, include prescriptions that “maintain liberal harvest regulations...” or create “liberal harvest opportunities...” as a strategies to reduce brown trout or brook trout, we think it advisable for FWP to establish an experimental design for some waters to determine if this regulation-only approach is scientifically (or socially) valid. We understand FWP's Region 3 is planning on testing the effects of new regulations adopted for introduced Yellowstone cutthroats in Red Rock Creek to address a hypothesis that competition pressures or predation from these fish might be dampening native grayling numbers. FWP should similarly test the effects liberal harvest regulations on brown and brook trout have on populations of bull trout or cutthroats.

Montana's Hatchery System

The creation of this statewide plan is an opportunity to review the hatchery and stocking program in the state. Montana's hatchery system provides valuable angling opportunities across Montana. A small slice of the hatchery system is also important for native fish restoration. We recommend the plan include FWP's specific criteria for when and where it stocks. We believe stocked waters should, with a few exceptions for popular waters in eastern Montana, be suitable so that fish can overwinter at least one year. Or, in the case of some reservoirs and stock ponds in eastern Montana, conditions should exist so that fish can survive through at least the general angling season. Currently the only requirement for stocking some waters, we understand, is that there is evidence of water.

The plan could include requirements such as these for stocked waters:

1. Adequate water except for years of severe drought. We understand some reservoirs and stock ponds run dry some years, and some years they have ample water year-round. For drought years, we recommend that FWP's fishery management plan direct the agency to stock only if water will be available no less than in the summer and fall of the same year.
2. Consider the potential for fish to overwinter in an average winter. Waters where overwintering potential is low to none should be the lowest priorities for stocking. Similarly, waters with harmful summer temperatures and water quality that reduces survivability should also be low priorities for stocking.

Because it appears FWP could be facing a fiscal crunch for at least the first several years of the term of this plan, we recommend that FWP identify criteria as we have suggested that are clear and unequivocal about when and where it will stock hatchery fish. This would be an important cost-saving measure. A number of waters in the state are extremely expensive to supplement with hatchery fish because of limited hatchery space and the costs of feed and transportation. FWP needs to better identify the costs and benefits of hatchery supplementation with the amount of angler demand specific water satisfies. Particular attention should be directed to private waters in eastern Montana, especially those with little annual angling pressure and difficult public access.

The plan should also clearly state that in the spirit of improving angler satisfaction, the agency will refine and enhance its interactive maps and similar tools to better identify which waters and when the hatchery system is supplementing. The current information across regions is inconsistent.

Illegal Introductions

FWP has now identified instances of at least 600 illegal fish introductions involving 50 species of fish into nearly 300 waters. The impacts of this activity on some waters, FWP agrees, have been staggering. The draft management plan, however, is soft on illegal introductions. The plan includes too many references (primarily in part II, but throughout) where species resulting from illegal introductions are managed as a

legitimate part of the sportfishery. This approach, in our view, incentivizes bucket biology. As we have in the past, we recommend that wherever a species occurs as a result of an illegal introduction the minimal, immediate suppression response – beyond chemical or mechanical removal – should be no-limit with required catch and kill regulations.

Habitat

We agree habitat protection and restoration should be an important part of any statewide fishery management plan. Unfortunately direction in the plan is scant. Little is stated about FWP's commitments for preventing habitat damage, and much of the restoration emphasis revolves the Future Fisheries and the River Restoration Programs. The plan should identify specific threats to habitat and how FWP will address them. Further, the department should map out some habitat and fishery goals for restoration that transcends the limits of its own funding sources.

Artificial Fish Ponds

Artificial fish ponds have harmed many of Montana's public fisheries. The plan should articulate the problems with ponds, and state that it is FWP's goal to discourage new pond development. The plan is good a venue to explain the problems ponds create for water availability, introduction of AIS and as sources of unwanted species.

Fishing Access Sites

FWP's FAS system is very good. It does need some tweaking though and this plan could be the instrument for evaluating changes. For instance, FWP should prepare water specific access plans that ensure the FAS system doesn't homogenize river and angling experiences. Not all sites require heavily developed, easy, lowest-common denominator access for watercraft. Not all sites need large parking lots. However, that is the trend TU members are experiencing. It appears the agency's primary response to dealing with visitor impacts at access sites is always to expand the site, which accommodates more use and facilitates more recreational conflicts on the river and with adjoining and riverside landowners. FWP should use access management -- combining heavily developed sites, with nominally developed sites, with varying point-to-point distances -- to maintain a diversity of recreational opportunities on our rivers, and to minimize the potential for creating crowding conflicts.

PART II

Fish Movement

Because of fish movement, the plan acknowledges that direction for individual water bodies can create conflicts with objectives in connected waters. We encourage FWP to ensure that objectives for one water don't undermine those of a connected water. This is especially important for waters where native species management is a priority,

where an AIS might have been identified in a connected water and where wild trout or native fish management might conflict with a connected introduced sport fishery, or where a species occurs because of an illegal introduction. FWP has done a good job tweaking its hatchery supplementation program for high lakes to ensure stocked fish don't create competition or hybridization issues with connected waters that host native species. But the department needs to further evaluate management strategies in instances where interactions between warmwater species and popular wild trout populations create problems. In those instances FWP should weigh the relative sport and economic value of the wild trout fishery with that of the presence of the conflicting species and regulate it accordingly.

Species Origin

Identifying species origin is important. Without origin being clear and explicit in the description of each waterbody, important values today's sportfisheries contribute might get lost in subsequent re-writes of the plan. Because no responsible angler favors illegal introductions, FWP should not be reluctant to clearly identify in the plan those species that are present in a waterbody as a result of an illegal introduction.

Descriptions of origin should be amended like this:

1. Hatchery (as described in the plan)
2. Wild (as described in the plan, and includes where FWP or Fish and Game were responsible for the introduction)
3. Transfer (as described in the plan)
4. Illegally Introduced (described as a known illegal introduction with a short explanation of the adverse impacts it poses)
5. Unauthorized Introduction (described as a likely illegal introduction, but because there is no record of it resulting from an FWP or federal fishery program, or the result of bucket biology, it is termed unauthorized)

River Section Explanations

Though these appear to be meant as the meat of the plan, we don't quite understand their value for future management. They largely comprise general descriptors of the status quo. And that is valuable. However, because they do not include measurable objectives to strive for, describe specific commitments that will occur to meet objectives, and include details on how each water will be monitored and what the response will be if management actions fall short, they have limited value as a management blueprint.

Thanks again the opportunity to comment. We would be happy to discuss our comments in person.

Sincerely,

Mark Aagenes
Conservation Director