MONTANA TROUT UNLIMITED

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Leo Rosenthal
Fisheries Biologist
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490 North Meridian Road
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Re: comments on draft EA Swan Lake experimental electrofishing

Dear Leo:

Thanks for the opportunity to comment on the draft environmental analysis for the proposal to assess the effectiveness of using electrofishing for destroying lake trout embryos at Swan Lake.

Montana Trout Unlimited, as does its Flathead Valley Chapter, support this project as a necessary research step that can inform development of alternatives for lake trout suppression at Swan Lake and elsewhere.

We do have several comments for you to consider:

- Though we always encourage FWP to comply with the Montana Environmental Policy Act when it proposes activities that change the human and natural environment, the experimental methods proposed for this project don't really rise to a threshold requiring detailed environmental analysis. Certainly this evaluation could probably have been limited to a checklist EA. Fishery managers in Montana have used Electrofishing routinely for decades, and the effects, in a general sense, are quite known. Certainly potential adverse impacts of this project are no more serious than those that can occur with routine population surveys that deploy electrofishing gear. The deployment of underwater cameras will also reduce potential impacts on non-target fish species.

- The only critical undisclosed information related to this project is a detailed plan of study, which in our view, based on the MOU signed by FWP and others, probably should have been vetted in the Swan Valley Bull Trout Working Group. FWP and the MFRCU might have benefited from this review, or not. Certainly it would have informed the collaborating parties of the reasonableness of the cost.

We recommend annual results of the study, as well as any course corrections in methods, be shared with the working group on a regular basis.

- Because the plan of study hasn't been fleshed out or reviewed in detail, it's a little unclear exactly what will occur the third year of the study. For instance, the scale of the experiment, on-site methods and the locations are not disclosed. As such, it's possible that conclusions drawn from applying the experimental methods at a spatial scale might require more than one year's worth of data to ensure the methods can be easily replicated in the field and the outcomes reasonably projected.

- Page 8 of the EA includes conjecture that a lake trout dominated fishery *could* offset changes in angler use related to loss of kokanee or bull trout. This is highly unlikely. In our experience everywhere lake trout have supplanted a fishery dominated by native salmonids, kokanee, perch or other sport fish, especially in combination, the result has been a reduction in angling pressure. We think it's reasonable to conclude with some certainty that if lake trout suppression isn't successful it will result in dramatic losses of desired sport fish, such as bull trout and kokanee. In turn, the remaining sport fishery will be simplified, accessible only to those with boats and sophisticated gear. The result is that angling pressure and perhaps the economic benefits derived from it will be reduced.

- Potential effects on benthic invertebrates (p. 13) is probably is not a relevant worry. The potential impacts on benthic invertebrates will be localized, much like in routine electrofishing efforts, and probably offset by rapid recolonization. Similarly, speculation about food web alterations (p. 15) is not critical. In fact, the fundamental object of lake trout suppression is to modify the foodweb by reducing the abundance of an apex predator, be it by gillnetting or electrofishing or a combination of both.

This is good project, well worth the investment, and the principal investigators, FWP and the research units, are more than qualified to carry it out.

Sincerely,

Bruce Farling
Executive Director