



PO Box 7186 Missoula, MT 59807 (406) 543-0054

Bill West  
Red Rock Lakes National Wildlife Refuge  
27650 B South Valley Road  
Lima, MT 59739

Dear Bill:

Sorry for not getting back to you earlier on this. But after contacting my local chapters and discussing the proposed alternatives for removing non-native salmonids in Red Rock Creek, Montana Trout Unlimited supports the two alternatives for trapping and moving the fish for a five-year period to Culver or Wigeon Ponds. We are ambivalent about the proposal to kill females and give them to food banks -- an option that might prove somewhat logistically complicated, though it makes sense to evaluate it as a potential option for all suppression efforts that involve netting or traps. We recommend the Service and its agency partners evaluate the results from the trapping on the grayling population in the lakes and creek before moving onto the next phase to employ piscicides for removing transplanted hybrids from the ponds. Depending on the results of the hybrid trapping, and angler response, it might be wise to evaluate whether maintaining a sport fishery in the ponds, albeit for non-native fish, for a little longer is a good idea.

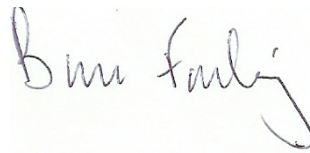
Our support of the trapping options is conditional on establishment of rigorous monitoring that helps determine whether suppression of rainbow-YCT hybrids indeed results in increased grayling survival and recruitment. After talking to FWP staff about this we're confident hypothesis behind the trapping can be tested by bulking up existing electrofish surveys, fry trapping and other monitoring methods. It seems it would also be important to closely monitor habitat and water quality parameters, including flows in Red Rock Creek and temperature and dissolved oxygen in the stream and lakes in order to eliminate other causal effects and increase confidence in conclusions that the trapping is effective. It might also be helpful, if possible, to collect creel data to determine angling pressure and how the new FWP regulations in Red Rock Creek might be contributing to reductions in hybrid numbers. A lot of things are at play in the refuge that can affect grayling numbers and it would good to establish a monitoring program that best isolates

the effects of trapping and removal.

If you see any role for Montana Trout Unlimited, or perhaps TU volunteers, in this effort don't hesitate to contact me. We are pleased FWS is increasing its efforts to conserve and increase native fish populations in the refuge. And we are happy to support, as we have elsewhere in the state, well thought-out efforts by the Service that advance native fish conservation.

By all means contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Farling". The signature is written in dark ink on a light-colored background.

**Bruce Farling**  
Executive Director