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1 March 2013

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

Re: EA on suppression of cutthroat/rainbow Xs

Bill,

Thanks for the opportunity to comment on the EA evaluating the disposition of cutthroat/rainbow hybrids that will be trapped during the refuge's experimental project in order to reduce competitive pressures and predation on native adfluvial arctic grayling. Montana TU represents 3,400 conservation-minded anglers statewide, including more than 1,000 in the three local TU chapters in southwest Montana: George Grant Chapter; Lewis and Clark Chapter; and the Madison-Gallatin Chapter. Members of each chapter and from elsewhere occasionally fish or otherwise recreate in the refuge. Montana TU is one of two non-agency partners participating formerly through an MOU with the State and federal government in the Montana Arctic Grayling Recovery Program. We have participated since formation of the effort and have contributed tens of thousands of dollars in cash and in-kind aid in conservation of arctic grayling, especially Montana's fluvial populations. We are heavily invested in conservation of this native fish.

Rather than urge individual members to send in comments, which we easily could have done, we have opted to summarize TU's collective comments in this letter. We strongly support the refuge in its desire to stabilize and increase populations of this native fish on the refuge and adjoining land. We greatly appreciate the long-term objective, and recent efforts, to create spawning and rearing habitat in Elk Springs Creek. And, we support any reasonable effort that increases survival of arctic grayling in the refuge, including the effort to experimentally remove fluvial cutthroat/rainbow hybrids from Red Rock Creek.

We urge the refuge, however, to support an alternative that blends trapping with the relocation of some of the hybrids to other waters on the refuge. We recommend this for these reasons:

- Moving the hybrids to another water will maintain some of the unique angler opportunity these fish represent – a large, adfluvial strain of wild trout. This opportunity is not available to our knowledge in any of the alternative angling destinations the refuge recommends.
- Maintaining some of the angling opportunity for the removed fish – as long as it presents little risk -- will help ensure there is greater angler buy-in for arctic grayling recovery efforts

We believe some of the risk can be mitigated by moving male fish only, or, perhaps by finding an alternative location besides Widgeon and Culver Ponds, which the refuge is reluctant to use. It does seem to us, though, that moving some trapped males to Culver Pond, which already has angling for another nonnative, brook trout, would entail minimal risk.

In order to maintain angler buy-in, as we pointed out in earlier comments, it is important for FWS and its partners to establish a rigorous experimental design that ensures monitoring is able to detect the effects of nonnative removal on the grayling population.

Several passages in the EA are a bit confusing as they relate to the risk of hybrid escapement to Elk Springs Creek. For instance, on P. 8, the EA states, “Currently few non-native cutthroat trout are residing in Elk Springs Creek drainage, downstream of Culver Pond.” The document further states on P. 8 that cutthroats “were stocked up until 1988” and that “current netting efforts indicate few if any of the fish currently reside in either Culver or Widgeon Pond.”

We are confused: Do cutthroat or cutthroat hybrids currently reside in these ponds or in Elk Springs Creek, and if they do why haven’t they been addressed as a risk to re-establishment of grayling in Elk Springs Creek? On P. 8, the document concludes that placing the trapped hybrids in the ponds represents too much risk because, “...it is likely that relocated non-native cutthroats would escape both Culver and Widgeon Ponds, where they would eventually migrate downstream and back into Red Rock Creek. “

We don’t necessarily question this risk assessment, but it seems to be saying two things: We might have cutthroats in and below the ponds now, and they apparently aren’t a problem, but if we put the trapped fish in the ponds they represent too much risk. Further, if there is risk to hybrids moving down Elk Springs Creek into the lake and back, what is the current risk of fish in the existing population in the lake moving into Elk Springs Creek today? In addition, if indeed some cutthroats or hybrids currently reside in Elk Springs Creek, or, are in the ponds and potentially can escape, it certainly seems that there currently might also be a risk of a spawning population being established in Elk Springs Creek.

On P. 11, the document states, “nonnative fish are believed to be one of the major limiting factors for the recovery of grayling. “ We don’t disagree with this hypothesis, which is why we support a project that tests it. It also says on P. 11, “If nongame trout escape the ponds and return to the upper lake, this may impact managers ability to test the role of nonnative cutthroat trout on the recovery of the arctic grayling program.” We agree there is potential for this. However, the EA does not explain what the measurable target is for nonnative removal, such as how much of the population will be removed. In order to determine this, it would be helpful to know how big a population we are starting with. It seems like the test needs to shoot for a specific exploitation target, especially if there is concern about fish repopulating the lake from the ponds.

We note that the trap is a couple of miles upstream of where Red Rock Creek enters the lake. It’s unclear if the trap is in a location where potentially all spawning fish leaving the lake can be captured. If not, the objectives of the project could be muddied.

P. 12 of the EA essentially concludes that the new 20-fish harvest limit will be an inducement for anglers to help in removing the nonnatives. We doubt that. Most anglers to Red Rock Lakes Wildlife Refuge probably practice catch and release angling, and this ethic is so ingrained, especially when large fish are brought to hand, that most people, given the option, will likely return most fish to the stream. We previously made a similar point to FWP. On page 13, the EA concludes the proposed action will not likely increase “the intensity of angling in the future.” We agree. However, it might reduce future angling because a featured sport fishery on the refuge will be diminished. It is not likely this will be replace by the angling alternatives the Service refers to in the EA.

Montana TU supports the suppression effort to benefit adfluvial arctic grayling. We recommend, however, the Service modify its preferred alternative to maintain some angling opportunity during the project life for the large nonnative fish, perhaps by transferring some of the captured males to ponds on the refuge.

Thanks again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bruce Farling". The signature is written in a cursive, slightly slanted style.

Bruce Farling  
Executive Director