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27 March 2013

Ken Breidinger  
Montana FWP  
Box 95  
Thompson Falls, MT 59873

Re: walleye suppression at Cabinet Gorge Reservoir

Dear Ken,

Montana Trout Unlimited, which represents 3,500 conservation-minded anglers across Montana, strongly supports FWP's proposal to suppress walleyes in Noxon Falls Reservoir. The arguments for suppression are compelling.

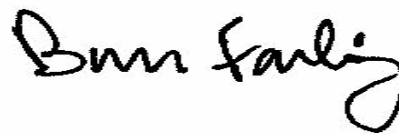
1. Walleye are present in Noxon Reservoir as a result of illegal stocking. FWP policy obligates the department when practicable to eliminate or reduce species that end up in public waters as the result of bucket biology. The methods proposed by FWP are practicable. To not respond to this illegal activity would incentivize similar behavior elsewhere.
2. Walleye were not identified as a species to be managed as sportfish in Noxon Reservoir in FWP's 2012 Statewide Fishery Management Plan. FWP staff spent more than two years developing this plan, providing opportunity for public comment on all waters in the state. The end result did not recommend legitimizing a sportfishery for illegally introduced walleye in Noxon Reservoir. If the plan is to mean anything, then walleye should be suppressed at Noxon Reservoir.
3. The presence of an expanding population of walleye at Noxon Reservoir jeopardizes the long-standing popular sportfishery for largemouth and smallmouth bass in this reservoir and in Cabinet Gorge Reservoir. FWP gillnet sampling indicates forage fish are in decline in Noxon, quite probably the result of a growing population of this new predator. As has been witnessed in reservoirs elsewhere when walleye are introduced on top of an existing balanced fishery, such as Canyon Ferry in the upper Missouri River basin, the forage base will decline and predation and competition on other sportfish will increase. The result: Reduced populations of the existing sportfish. This has been the experience at Canyon Ferry. After the illegally introduced walleye population expanded there, forage fish such as white suckers declined, as did the sportfishery for yellow perch and rainbow trout. Today, the measurable management objectives for white suckers and yellow perch are not being attained. The target for rainbow trout is also below objective, even though FWP significantly increased its investment in hatchery stocking. Further, though walleye numbers are significant, catch-rates are variable and there are significantly fewer large

fish then when the population was on a steep incline in the 1990s and early 2000s. Because there is only so much space, and so many food resources in Noxon Reservoir, the public can expect the same result there if walleye numbers aren't reduced. There will be fewer forage fish, fewer bass, fewer trout and, eventually, a walleye population dominated by stunted fish. Importantly, the bass fishery, and the angler days and tournament culture that it has produced will suffer.

4. An expanding population of walleye will certainly threaten the efforts of Montana FWP, Idaho F & G, Avista Corp., PPL, the U.S. Fish and Wildlife Service, and other interests including Trout Unlimited, to restore a semblance of the once prosperous migratory populations of bull and cutthroat trout that reside in the lower Clark Fork region. Millions of dollars have been expended on genetic and telemetry studies, dam operations, fish passage, habitat conservation and improvement, and removal of introduced species in tributaries and at Lake Pend Oreille. Additional expenditures are being planned. An abundant population of a new predator in the reservoir system and downstream would represent a setback for these conservation efforts. The value of PPL's investment in fish passage at its Thompson Falls Project will be compromised because it could allow walleye movement above the dam, opening up new habitats in the lower Clark Fork and lower Flathead Rivers. This in turn could threaten existing sport fisheries in these waters and their tributaries.
5. Allowing walleye to thrive in Noxon Reservoir (and by extension Cabinet Gorge Reservoir) will do a disservice to cooperative fishery efforts between Idaho and Montana. Currently fishery staff in both states are developing disease protocol that should allow migratory forms of cutthroat trout to be moved from below Cabinet Gorge dam into the upstream reservoirs or tributaries. The protocol, we understand, will also allow for continued movement of Lake Pend Oreille and lower Clark Fork bull trout into the reservoir system, its tributaries and potentially upstream. The reasonable caution Montana is exhibiting to prevent unwanted pathogens from finding a path into Montana should also extend to Idaho's interests in not having to deal with pulses of walleyes moving down the Clark Fork from Montana into Lake Pend Oreille.

Montana TU compliments FWP for developing a preferred alternative to remove walleye from Noxon Reservoir. The methods proposed are sound and have been successfully used elsewhere. We look forward to a final decision that gives the green light to suppression.

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

cc.  
TU chapters  
Bruce Rich  
USFWS  
IDFG