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**Re: DEIS on proposed strategies to benefit native species on Flathead Lake**

Les:

Thanks for the opportunity to comment on the Draft Environmental Impact Statement on proposed strategies for reducing lake trout abundance in Flathead Lake. Montana Trout Unlimited (Montana TU) represents 3,600 conservation-minded anglers statewide, and around 1,500 in western Montana. Many live or make their livelihoods in the Flathead region. Many, though far fewer than in the past, fish on Flathead Lake or in the North and Middle Forks of the Flathead River.

Many fewer TU members fish the Flathead system these days than prior to the 1990s because kokanee salmon have disappeared from the lake, and the abundance of cutthroat trout and bull trout is significantly reduced. Further, today it is illegal to fish deliberately for bull trout in the lake and connected river system. This is largely the consequence of an overabundance of lake trout in Flathead Lake.

Our objective, as well as that of our local Flathead Valley Chapter, is to help restore once abundant populations of native cutthroat trout and bull trout to levels that might eventually accommodate a reasonably satisfying catch-and-release fishery (and perhaps eventually limited harvest) in the lake and river system. In order to do that, fishery managers and managers of key habitats must stem the decline in both species and implement actions that augment populations of both fish.

We endorse the objectives in the two primary restoration blueprints adapted by the State of Montana and its partners for both fish. These plans are:

1. *Stated of Montana Bull Trout Restoration Plan, 2000*
2. *Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana, 2007*

Goals for the Flathead portion of the Clark Fork River basin in the State of Montana's bull trout plan are:

- Maintain or restore self-sustaining populations in the core areas
- Protect the integrity of the population genetic structure
- Enhance the migratory component of the population
- Increase bull trout spawners to attain the average red count level of the 1980s, and maintain this level for 15 years (three generations) in the North Fork and Middle Fork monitoring areas.
- Provide for a long-term stable or increasing trend in overall population
- Provide for spawning in all core areas

We maintain, and the available data support, that few if any of these goals are being met. Self sustaining populations and genetic structure is at risk because local spawning populations in the North Fork of the Flathead have dwindled to a point where they are now at significant risk from stochastic events, or the remaining spawning population is otherwise too small to maintain long-term persistence. Further, the population trend indicates the migratory population is shrinking, the spawning population is less than half of the average redd counts of the 1990s (especially in the North Fork), and there is no evidence indicating the long-term trend is stable or increasing.

The primary objective from the cutthroat plan related to population status is:

- Maintain, secure, and/or enhance all cutthroat populations in Montana designated as conservation populations, especially the genetically pure components.

Again, all the available data, including annual standardized netting in the lake and angler surveys indicate that the cutthroat population associated with Flathead Lake is in serious decline, and does not meet the objective to "maintain, secure and/or enhance" the population.

The tribes have established through years of data collection, modeling and scientific peer review that the abundance of lake trout in Flathead Lake is the primary culprit for the reduction of native fishes in the lake and connected river system. The primary mechanism appears to be predation. Few if any fishery professionals dispute this (though there is reasonable conjecture that competition for food resources and space between juvenile lake trout and bull trout is also a contributing factor.)

The tribes have also convincingly established through population estimates using accepted methods that the lake trout population in the lake is at or close to carrying capacity. Peer reviewers have not disputed this.

Further, it is beyond dispute that the tribes with the help of the State of Montana's regulation-setting process and coordinated through the Flathead Lake and River Co-Management Plan (2000) have invested much in angler-based approaches for reducing lake trout numbers with the objective of triggering a corresponding increase in native fish. It is reasonable to conclude, as have the tribes, that based on all the metrics available – redd counts, gill net sampling in the lake, and angler surveys – that both bull trout and cutthroat numbers are not increasing, especially in respect to the State's conservation plans and the objectives in the co-management plan.

Bull trout numbers in the lake and river system are not "secure," no matter how you define it. The great majority of the professional fishery community familiar with the system agrees. In fact, we believe the standard formula Montana FWP has used for determining how many adults might be in the lake – a 3.2 multiplier for the index redd counts -- represents a best-case and less accurate upper end estimate. The estimate also includes an inflation factor for "missed redds," (but correspondingly doesn't include a factor for misidentified redds). Further, it assumes alternate spawning for adults, an assumption that is not backed by contemporary evidence. We have pointed this out to FWP in the past, but the agency sticks to the 3.2 multiplier. The Montana Chapter of AFS, in fact, agreed that this multiplier is not appropriate when it commented on the development of secure levels for the co-management plan (See Letter from P. Clancey to M. Deleray, 8/2/02). AFS recommended a multiplier of 2X per redd would be a more reasonable and conservative approach. Al-Chokhachy and Budy (2005) recommended 2.68 as more reliable multiplier. Further, some professionals believe that the redd counts in the index reaches might include fluvial fish, potentially further inflating the estimate of how many adult bull trout are present in Flathead Lake.

We disagree with FWP's conclusion that the composite redd counts they tabulate for the Middle and North Fork represent a "secure population," meaning the fish are doing fine, and therefore additional lake trout suppression is not merited. First, the 300 redd level that FWP insists is "secure" does not represent security and it does not meet the objective of the co-management plan to increase numbers toward those of pre-Myis levels. Local populations in the North Fork continue to dwindle, reducing diversity and geographic distribution of bull trout. The purported "secure" level, and the recent composite redd counts exceeding 300, still do not allow for angling, nor are they sufficient enough to imply a change is necessary in the formal "threatened" status for the fish. Three-hundred redds is a red-flag indicator, not a target. Further, Allendorf and others point out recent redd counts are not large enough to offset potential losses of local populations from stochastic events. Finally,

the objective of the co-management plan and the State of Montana conservation plan for the fish is to *increase* the population, with a goal that moves it towards 1980s levels, when nearly 900 redds would be documented basin-wide and harvest was prominent. It might not be possible to reach 1990 levels, but it is possible to significantly increase the numbers from today if the right methods are applied.

Basically, the status of bull trout in the connected lake and river system is probably less diverse and abundant than assumed for this plan. And the trend is not upward. Further, no one – including FWP – has produced any evidence that demonstrates exactly why the current basin-wide redd count has been somewhat stable for the last few years (in truth, it is only the Middle Fork population). Further no one has explained the biological or physical mechanisms that are at work to maintain this condition, or, why we should expect it to stay this way. Importantly no one has demonstrated empirically why the public can expect the bull trout population to not eventually decline to a state of functional extinction in the presence of a large lake trout population, much as eventually occurred at most western lakes where they occupy the same habitats. **Without evidence demonstrating that the current numbers are indeed “stable” or “secure,” and can persist or increase over time, it’s reasonable to assume further decline will occur, as has happened elsewhere.**

This speaks to several conclusions: The bull trout (and cutthroat populations) are not “secure” or “stable.” It is probable they are worse off than appears, and it is reasonable to conclude in the absence of additional action they will continue to dwindle, with, in the least, the adfluvial life history eventually disappearing.

**Given all this, Montana TU supports Alternative D in the DEIS.**

We believe Alternative D is appropriate because:

1. Of all the alternatives presented, it will produce the soonest and best results for native fish, even given the potential for additional bycatch mortality, than the other alternatives.
2. Bycatch mortality can be minimized through selective netting methods and monitoring, as has occurred at Swan Lake.
3. It still depends on angler-based tools for a significant portion of the lake trout capture.
4. If successful, it still leaves plenty of lake trout in Flathead Lake for anglers. In fact, it potentially improves angling quality by producing larger, better conditioned fish in the 1-8 ages -- therefore offsetting the desired long-term trend towards fewer fish of slot-size. It is important to keep in mind that angler surveys in many fisheries repeatedly indicate that catching trophy size fish is not the primary objective of most anglers (much like

trophy size antlers are not the primary objective of most big-game hunters). Angler satisfaction is based on many other elements, most which will not be affected by gillnetting or a slightly reduced lake trout population.

5. Published literature from other lake trout fisheries indicates the reduction in lake trout catch-rates that will result will not be significantly less than the present. It is hard to imagine that the result of Alternative D -- a reduction of around 143,000 fish of fish greater than 8-years-old in a population estimated to currently number 1.5 million fish -- will reduce angler use on the lake. Certainly it won't result in reductions representing the scale that has resulted from lake trout now dominating the system (an estimated 33,000 angler-days in 2012, compared to highs around 170,000 in pre-Mysis days).
6. The small impacts to angling that *might* occur as a result of Alternative D are hardly a magnitude that can be detected in the tourism economy of the Flathead region. The State of Montana Office of Tourism estimated that in 2012 non-resident travelers spent around \$213,246 million while visiting the Flathead Valley (Missoulain 22/12/2012). In 2011, the owner of a charter business on Flathead Lake provided information to the ID team for the DEIS that his industry (9 businesses) represents about 3,000 angler-days-year. Assuming the charters receive about \$700/day (which is a high-end estimate), it appears that the lake trout charter industry still represents less than 1 percent of overall non-resident tourist spending in the Flathead region. The number becomes even more insignificant when you factor in resident spending. It simply makes little sense, then, to argue against additional suppression because it might (but probably won't) harm Flathead Lake's charter businesses. That said, as we have pointed out to charter boat folks, even with Alternative D, they would have plenty of fish to chase. They just might have slightly reduced catch-rates and fewer trophy fish, but, based on anecdotal conversations with them, most of their clients aren't necessarily after trophy fish. Further, trophy fish are not going to be eliminated, nor will their numbers even dwindle that rapidly should Alternative D (or C) be selected. Our point: The potential economic loss of adding gillnetting (or bounties) to Mack Days as a suppression method is not significant. Despite fears to the contrary, it shouldn't alter much the economic contributions of the small charter boat industry or that of general anglers. And in fact, it could result in improved fishing for other sportfish, including Lake Superior whitefish, yellow perch, and, certainly, large cutthroats and the occasional bull trout in the Middle and North Forks.
7. We agree with the tribes that the increase in lake trout suppression represented by Alternative D is not likely to increase the risk of algal blooms on Flathead Lake. Mysis levels might increase, but to levels the lake

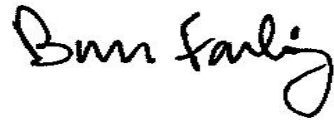
has experienced previously. Further, these densities are still below other western lakes, including Swan and Pend Oreille, which haven't experienced algal blooms as a result of either higher Mysis numbers or lake trout suppression. In the unlikely event algal blooms did result, were proven to result from a slightly smaller lake trout population, and, the tribes and State agreed reversing this was more important than reducing the abundance of lake trout, then all that would have to occur is to reduce lake trout harvest. The system would likely revert to the pre-Alternative D state. The notion some have that increasing lake trout suppression to the levels suggested in the DEIS will result in irretrievable ecological effects is unfounded.

It is important to note that the effort the tribes are recommending for Flathead Lake are conservative when compared to those at Pend Oreille, Swan and Yellowstone Lakes. In those lakes, the objective is to achieve an exploitation rate on the full lake trout population –juvenile and spawning-age fish – by more than 50 percent. The effort so far in 2013 at Yellowstone Lake, in fact, has already involved more than 30,000 net nights (100 m./net/night). More than 180,00 lake trout have been captured. Last year nearly 300,000 lake trout were captured by the end of the season. Interestingly, as of mid-July, despite an increase in effort of half-again as much net nights from the same date last year, the CPUE has declined. Though size-distribution analysis is not complete, it is possible the ramped up park effort is starting to achieve a desired exploitation rate. The same amount or more effort is resulting in fewer lake trout. Last year, lake-wide distribution netting (which started in the late 1960s for monitoring cutthroat numbers) revealed a statistically significant increase in younger cutthroats, the first such increase in many years. Though the data are incomplete, it is possible lake trout suppression is starting to reduce predation enough that cutthroat numbers are responding. Couple this with the kokanee rebound at Lake Pend Oreille, and preliminary, but not conclusive, lake trout suppression results and last year's slight bump in bull trout redds in the Swan, and we conclude: Lake trout suppression deploying strategically selective gillnets can reduce lake trout numbers to benefit important introduced and native sport fish.

We are convinced Alternative D is the appropriate approach and compliment the tribes for producing an exhaustive, transparent and important environmental document. We look forward to working with the tribes and hopefully the State on the details of implementation of an alternative that works best for the native fish and anglers in Montana. We would like to discuss further the options for bounties, monitoring and public outreach.

Again, thanks for the opportunity to comment.

Sincerely,

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

Bruce Farling  
Executive Director

cc.  
Flathead Valley TU  
Westslope TU  
TU national  
Office of the Governor  
Director Hagener  
FWP Commission