



Les Evarts
Fisheries Program Manager
Confederated Salish and Kootenai Tribes
Natural Resources Department
P.O. Box 278,
Pablo, Montana 59855

Dear Les,

The Flathead Valley Chapter of Trout Unlimited, representing over 325 members in Northwest Montana, would like to take this opportunity to express our support of the Draft EIS, *“Proposed Strategies to Benefit Native Species by Reducing the Abundance of Lake Trout, Flathead Lake, Montana”*.

In the early 1980s, abundant kokanee salmon in Flathead Lake as well as a good mix of other fish species made Flathead Lake the #1 lake angling destination in Montana with more than 100,000 angler days annually. Mysis shrimp were first noted in Flathead Lake in the early 1980s. The appearance of Mysis presented a huge advantage to the lake trout population by presenting the bottom-dwelling juvenile fish with a new and abundant food source. The result was a boom in the lake trout population. In just a few years, more than 15 million kokanee were entirely wiped out by lake trout predation and competition. Other fish species were in rapid decline. Native bull trout and westslope cutthroats declined by more than 50%.

In 1989, the Confederated Salish and Kootenai Tribes, along with Montana Fish, Wildlife and Parks wrote a 5-year management plan for the Flathead Lake and River system aimed at stemming the decline of our native fish. By the early 1990s, it had become apparent that if the growth of the lake trout population was not contained, we faced the very real possibility of complete loss of native bull trout and possibly other fish species. In 1992, all angling for native bull trout was legally prohibited in the North, Middle and Mainstem Flathead due to extremely low numbers. Bull trout range-wide were in peril due to lake trout predation and other causes. In 1998, bull trout were named a “Threatened Species” under the Endangered Species Act.

In 2000, after more than a year of work, CSKT and MFWP implemented a 10-year Flathead Lake and River Fisheries Co-Management Plan based on an “adaptive management” strategy. *“Through adaptive management, actions can be adjusted as new information comes to light.” “Actions that work effectively are continued: those that do not are dropped.”* The primary goal of the 10-year Co-Management Plan was to *“Increase and protect native trout populations (bull trout and westslope cutthroat trout).”* The plan made the overall assumption that; “Reduction of lake trout will cause an increase in westslope cutthroat trout and bull trout through reduced predation and competition.” The plan implemented five strategies aimed at achieving fisheries management goals in the lake and river system. The “Fish Population Management”

strategy (#5) stated the intention to suppress nonnative fish through recreational angling. Assumptions included in the strategy were:

- Reductions of lake trout would lead to increases in native fish populations.
- Increases in bull trout populations will require disproportionate decreases in lake trout populations.
- Recreational angling can generate and maintain sufficient harvest of nonnative fish to benefit native fish.

Those assumptions were never fully tested by the plan. By the time of the mid-term review of the Co-Management Plan in 2005, managers stated; *“Recent efforts to increase lake trout harvest have not been large enough to reduce the lake trout population.”* The review concluded that the first five years of the plan had resulted in “stable” populations of both native trout and lake trout. The goal of Phase II became to greatly increase the effort in order to achieve a total harvest of at least 60,000 lake trout through changes in bag limits, expanded fishing events and other actions. The plan would strive to preserve angler participation at 40,000 angler days annually.

By the conclusion of the 10-year plan in 2010, goals had still not been met. Lake trout harvest continued to be insufficient to reduce the large population now estimated at more than 1.5 million fish. CSKT proposed moving to “more aggressive” strategies through the proposal of a three year pilot project to test the efficacy of gillnetting to additionally suppress the lake trout population. MFWP Director Joe Maurier at the time wrote to the Tribes that, *“I am committed to putting a gillnetting pilot program together. I am committed to enhancing bull trout populations in Flathead Lake, as we have in other lakes in other parts of the region. I recognize gill netting as a legitimately identified management application in the joint management plan.”* CSKT produced an Environmental Analysis and Memorandum of Understanding to be signed by the lake managers and other interested parties. MFWP rejected the MOU as *“incomplete in both content and process”* and removed their name from the document.

To satisfy MFWP objections to the original document, the Tribes began work on a new plan using a full-blown Environmental Impact Statement process. The tribes spent hundreds of thousands of dollars to rewrite the proposal using the best available science. The Tribes sought the advice of some of the country’s best fisheries scientists working on lake trout. The new plan received the support of the U.S. Fish and Wildlife Service, U.S. Forest Service, U.S. Geological Survey, National Park Service, Montana DNRC and both Montana Universities as well as several conservation and angler organizations. MFWP continues its objection to any form of netting to suppress lake trout based on their opinions expressed beginning with the mid-term review.

Flathead Valley Trout Unlimited applauds the efforts of CSKT in attempting to fulfill the goals of the Co-Management Plan using strategies outlined by the plan to achieve the necessary amount of lake trout suppression. The Crown of the Continent and the Transboundary Flathead remain one of the most treasured and diverse ecosystems in the world and is currently protected by an international agreement between British Columbia and Montana. Through our own actions and inaction we have removed valuable segments of the biota and altered the biological mix in that area. It up to us to rectify our mistakes.

We support the implementation of Alternative D in the Draft EIS to double the current suppression effort. That obviously cannot be achieved through recreational angling alone. We feel that Alternative D will reach goals outlined by the Co-Management Plan and the science team and will do so in the most timely and efficient manner. We feel that this alternative has the best chance of meeting objectives outlined in the Montana Bull Trout Recovery Plan and the Conservation Plan for Westslope Cutthroat Trout with less danger to native populations.

Rationale in support of Alternative D include:

- The ecological damage to native fish and other wild fish in Flathead Lake and River system due to invasive lake trout is profound. The decline in native species and the loss of the kokanee salmon is significant and must be reversed. Alternative D is consistent with the State of Montana Bull Trout Restoration Plan and the statewide conservation plan and MOU for westslope and Yellowstone cutthroat trout. Both guiding documents are clear: The objective for bull trout and cutthroats is to implement actions that increase populations rather than to simply maintain the status quo. The objective for the Flathead for bull trout is to endeavor to achieve population numbers and stability similar to the pre-mysis days.
- Alternative D is an important step necessary to recover threatened bull trout populations eventually leading to de-listing under the Endangered Species Act. We believe pro-active recovery efforts are appropriate for a threatened species particularly when the decline can be traced to an invasive species like lake trout. Maintaining a “stable” population of bull trout as suggested by Montana Fish Wildlife and Parks will not contribute to species recovery and may lead to population instability due to declining redd counts in some North Fork tributaries.
- The decline in adfluvial cutthroat trout and bull trout has seriously diminished fishing opportunities in Flathead Lake and River system. Suppression of lake trout and the anticipated increase in cutthroat trout will lead to increased angling opportunities in the river and lake. Before mysis and lake trout when the recreational fishery consisted of millions of kokanee, many more bull trout and cutthroats, perch, lake whitefish and the occasional lake trout, angling pressure peaked at around 170,000 a year. Last year we saw only 33,000 angler days. Basically, lake trout angling didn't make up the difference. The numbers tell us that anglers prefer a more diverse fishery. The goal in the co-management plan is 50,000 angler-days. In the days before lake trout dominance, opportunities abounded for all kinds of anglers – expert anglers, occasional anglers, kids, families, etc. Flathead Lake was a primary destination for anglers -- those with boats, those who fished from shore, those with fancy gear, and those who dunked worms. Today it is primarily a destination for lake trout anglers with power boats and specialized gear, and for anglers who happen to be around when a perch or whitefish bite is on, which isn't every year.
- Bull trout and westslope cutthroat remain culturally, environmentally and economically important throughout the Flathead Basin in Montana and extending

into the Canadian headwaters of the North Fork Flathead River. In 1987, the Flathead River International Study Board estimated from creel censuses that bull trout angling in the North Fork, Flathead, the Mainstem Flathead and in Flathead Lake supported more than 97,000 bull trout angler days annually. This activity was estimated to have a value of \$5 million in 1986 dollars, or about \$11 million in today's dollars. As angler days continue to increase on the Flathead River, the economic benefit of growing these native species will continue to increase as well.

- There is a strong scientific basis for Alternative D. Lake trout suppression and native fish recovery is supported by a host of fisheries experts from the U.S. Fish and Wildlife Service, U.S. Forest Service, U.S. Geological Survey, National Park Service both Montana Universities as well as several conservation and angler organizations.
- We reject the contention that no action is currently necessary since the present harvest of 70,000 lake trout will benefit native fish. It is obvious that continuing to do what we have been doing is not working. The expert panel agreed, saying that the current harvest level would result in a decrease in predation that is "too small to measure".
- While there is a concern about loss of economic guiding opportunities on Flathead Lake, the economic value of guiding and fishing the river system far outweighs the values associated with the lake. Furthermore, ample fishing opportunities for lake trout will continue into the foreseeable future.
- Lake trout suppression efforts in other western waters including Yellowstone Lake, Lake Pend Oreille, and Swan Lake appear to be working. Experience with these efforts is leading to improved techniques that help minimize bycatch. Gillnetting of lake trout in combination with bounties and special angling regulations have been occurring on Lake Pend Oreille for about 9 years. There, kokanee were nearly wiped out, much like at Flathead because of exploding mysis and lake trout populations. Kokanee are an important food resource for adfluvial bull trout in the Pend Oreille system. Lake trout suppression efforts appear to be successful with kokanee rebounding to the point there is an angling season on them this year for the first time since 2005.
- There is no evidence that lake trout suppression will result in a decline in water quality due to an increase in algae blooms. Several other lakes, such as Pend Oreille, have much higher Mysis populations and experience no algal bloom problems. If by some chance algae blooms become a problem, the suppression of lake trout can be reduced or stopped.
- The argument that bycatch from gillnetting will harm native species is deceptive. Of course bycatch will occur as gillnets are not selective and it is something that will need to be closely monitored. In any of several projects involving netting of lake trout, there has never been an instance where bycatch of non-target species has caused those species to permanently decline. In the Lake Pend Oreille and Swan Lake netting efforts they have kept close track of bycatch mortality. In neither case has harm to native bull trout populations been documented. In Pend

Oreille, after six years of netting, population estimates show that the bull trout population has not suffered at all during the netting effort. The U.S. Fish and Wildlife Service is charged with monitoring ESA-listed populations and will have full authority to make changes to the plan and/or stop it completely if damage is occurring.

We encourage the CSKT to craft an alternative that provides for adaptive management including the use of existing and emerging technologies such as radio telemetry to identify and target spawning areas with netting operations, and electrical disturbance to destroy eggs. We also support the use of a bounty system to increase lake trout harvest.

We reject the contention by MFWP that we need do nothing because both bull trout and lake trout populations are “stable” and “secure”. We have seen drastic reductions in the populations of both of our native trout species and lake trout are proliferating throughout the watershed in increasing numbers. None of the activities tried so far have either reduced lake trout numbers or increased the populations of native fish. In fact, the reverse seems to us to be true. The 2002 report, *“Native Trout Security Levels for the Flathead System”* written and signed by MFWP and CSKT as part of the Co-Management Plan clearly states that *“Secure levels do not represent target or management goals. The Co-Management Plan is specific in its goals to increase native trout populations.”* It is evident that “secure” at extremely low numbers is not sustainable and cannot be used as a management goal.

MFWP continues to defend the Slot Limit for lake trout, while agreeing that those larger fish will disappear with, or without, additional suppression. Fish in the slot-limit and above sizes are older fish (20+) that were born during the large population boom in the early 1990s fueled by the demise of the kokanee population. Those fish are reaching the end of their life span and since current angling pressure targets fish just below the slot, there are fewer and fewer lake trout recruiting into the larger sizes. Even with no action, the future population will be composed of more robust, faster-growing and shorter, but heavier average-sized fish. We agree with the decision to drop the slot limit under all the proposed alternatives.

Commercial lake trout charter boat operators have stated that lake trout are getting harder and harder to catch in Flathead Lake. MFWP postulates that the current harvest of 70,000 lake trout *“may already be impacting fishing”*, but they cite no supporting data. The contention of negative impacts to lake trout fishing is not borne out by redd counts or population netting in the lake. Mack Days contestants certainly seem to have no trouble boating 80+ lake trout in a day. If you look at the websites of the commercial charter boat companies, you will see many statements like this; *“This year has been a great year for big fish. I have been tracking my fish over 30 inches so far this year, and our clients are connecting on at least one fish over 30” on almost every charter!*” or *““The catch rates are high and trophy size fish are abundant.”* Perhaps these are statements are only made to attract clientele, but they conflict with written and oral statements concerning lake trout management.

With new legislation pending and the vast amounts of time and money being spent to protect and enhance the water quality and aquatic habitats of the North Fork Flathead and Crown of the Continent ecosystems, it only makes sense to protect and restore the

native species that depend on those lands. Flathead Valley Trout Unlimited fully supports restoring native fish species and enhancing the natural and economic value of the Flathead River Basin by reducing the bloated lake trout population and restoring balance to our home waters. Thank you for taking our comment.

/s/ Larry Timchak

Larry Timchak
President
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