

October 22, 2009

Karen Zackheim
Acting Fisheries Bureau Chief
Montana Fish, Wildlife and Parks
PO Box 200701
Helena, MT 59620-0701

Re: Draft Upper Missouri River Reservoir Fisheries Management Plan

Dear Karen:

Thank you for the opportunity to comment on the draft management plan for the Upper Missouri Reservoir system. Montana Trout Unlimited represents 3,300 conservation-minded anglers. Many TU members fish in the Missouri River system, including the reservoirs and river reaches. We believe the draft plan has some valuable recommendations. But we also find some recommendations that are troubling.

A Top Priority of this Plan Should be Protection of the Wild Trout Fishery in the River

Because management of these reservoirs doesn't operate in isolation from the river, FWP should; develop a monitoring plan in river sections adjacent to the reservoirs; reclassify the river reach below Holter Dam as a trout fishery and not a multi-species fishery and institute a walleye suppression plan for the river below Holter Dam.

This plan should include preventative management actions, as well as triggers that require additional actions when adverse effects are detected. FWP should determine population trends, even if they are more qualitative in nature, for walleyes below Holter. That means developing statistically valid population estimates or at least general trend data using CPUE methods. Further, FWP should not manage for walleyes in the river below Holter Reservoir. Based upon information from FW&P fisheries biologists who electro fish the Missouri River below Holter Dam, since the illegal introduction of walleye in the reservoir system walleye numbers have continued to grow in what is a prized world-class wild trout fishery. This places young wild trout in jeopardy of escalating predation and consequently endangers

the entire fishery. MTU recommends allowing anglers to keep as many as they catch year-round. At the very least walleyes captured during electro fishing should be removed from the system rather than returned. We think this type of management is essential and should be included in the new 10-year management plan if FWP is going to concede Canyon Ferry, and to a lesser extent, Hauser and Holter as primary walleye fisheries.

A Multi-Species Fishery is Difficult to Attain

A review of the scientific literature, as well as an examination of management elsewhere in Montana and other western states, indicates it is very difficult to manage for low-cost, high-quality, multi-species fisheries that include walleyes in the mix. Certainly it appears to be practically impossible to achieve this goal when salmonids are mixed with walleyes without the benefit of expensive hatchery supplementation that generally includes age 1+ fish. This is why we were skeptical 10 years ago about the prospects for success when the goals for the last Upper Missouri Reservoir were developed. And it is why we continue to be skeptical that FWP's preferred alternative for this plan can succeed. The preferred alternative for this plan only tweaks existing management, and it lowers the bar significantly for trout and perch abundance when compared to the aims from 2000. The plan incorrectly states that trout populations in the reservoir system are "stable". This should be changed (see your chart on page 21). Trout populations have clearly declined over the past 10 years. The current draft plan prescribes future management that will continue to be at the expense of yellow perch and rainbow trout abundance and reduced flexibility for FWP's fisheries budget.

We remain concerned that this plan largely ignores the radical transition that is occurring in angling opportunities and satisfaction in this system. For instance, the pre-walleye annual average for angling pressure at Canyon Ferry was higher both for in and out of state anglers, primarily for rainbow trout and yellow perch. Today that number is dropping and is down 31.5% in the reservoir system since 1999 (draft plan page E-3). According to FWP (p. E-3), around 50 percent of the summer angling is now exclusively for walleyes. That means there is dramatically less angling pressure at Canyon Ferry today for rainbow trout and perch. The reason for this change is simple: There are fewer rainbow trout and perch to catch. On the other hand, 50 percent of the summer angling use is apparently exclusively for walleyes. Though this summer walleye pressure is at an all-time high, it is still less than half of all annual angling use at the reservoir today.

And thus, it appears to us that the primary thrust of this plan to manage for a high-quality walleye fishery (with high abundance, opportunities to catch large fish and desirable catch rates) is being done to benefit only the minority of anglers – those who are benefitting from an illegally stocked species at the continued expense of the interests other anglers. That is exactly what occurred as a result of the last plan. Further, this transition is affecting more than angling numbers. It also affects opportunities. Today, because of the dominance of walleyes, the fishery is best

exploited with a boat and expensive downrigger systems. There are fewer opportunities as there were in the past for families, kids and ordinary anglers to fish from shore or through the ice, irrespective of the species targeted.

For us this means, FWP should either tell the public upfront that it desires to make this solely a walleye fishery with incidental angling opportunities for other species, or, the department will manage walleyes and walleye harvest more aggressively in order to provide greater benefits for the sport fish that historically were the backbone of angling pursuits at Canyon Ferry. There is no middle ground. It will not be possible to achieve the original goal of a “cost-effective, high-quality, multi-species fishery with high angler satisfaction” if FWP’s preferred alternative is adopted.

Noting that angler use and satisfaction has been historically higher when perch and trout numbers are high, we ardently oppose reducing the abundance targets for these species and setting low target thresholds (3 perch per net and 5 rainbows per net) for instituting management changes. Thresholds should be at least double those prescribed in the plan.

To state “but it was not feasible to sustain the fishery at that level, as the hatcheries could not supply the request for fish necessary to maintain 10 rainbows per gillnet” places the responsibility on the hatchery system. This is wrong-headed biology that ignores the reality that it is increased predation that is reducing rainbow numbers.

The reality of the difficulty of managing for “multi-species” that include illegally introduced walleye as predatory species was predicted and the decline in ten year abundance numbers and walleye condition reflect that difficulty. If perch and trout abundance cannot be reinstated to the levels historically attained before the multi-species plan was instituted by 2012, then FWP should clearly state that the multi-species plan reflects a new reality of fewer species, reduced angling days and reduced angling satisfaction. That is unacceptable. Montana TU urges FWP to abandon the multi-species plan, which includes walleyes. Walleye numbers should be greatly suppressed and reservoir management should return to the historically documented and clearly more successful perch and trout fishery.

The Rainbow Trout Picture is Misleading

The draft management plan paints a rosier picture than actually exists for rainbow trout in Canyon Ferry. Since 2000, FWP in every year but one has detected the lowest abundances, according to net data, of rainbow trout on record. Yet (on page 22) the management plan states, “there is an upward trend” the last couple of years. That may be true, but it’s probably a short-term artifact, and it is less relevant when the numbers for the last two years are less than 50 percent of what they were for most of the 1990s (and substantially less than they were in the 1980s).

We thus question whether FWP's goal of maintaining the "the current level of angler catch" is appropriate to meet angler satisfaction. If it is, FWP should disclose that this much-lower-than-historical opportunity will be maintained, it appears, only by spending 3 ½ times as much money for stocking rainbows then it did in pre-walleye days. Further, it should be acknowledged that this has triggered additional financial externalities inside FWP, including taking up a significant amount of the capacity of two FWP hatcheries. To offset this monopolization of hatchery capacity, it appears non-Missouri River system fishery managers are then forced to seek other sources for rainbows that they once could have acquired from the two facilities that the Canyon Ferry program now exploits. Or, it forces them to reduce their planned stocking, potentially reducing angler opportunities elsewhere. We conclude that the additional travel costs and use of hatchery space elsewhere for other fishery needs is one of the undisclosed yet significant costs of attempting to manage Canyon Ferry for walleyes and rainbows. It is important for FWP to inform license holders of these trade-offs.

Just Say No to Forage Fish

Montana TU supports FWP's general opposition to the introduction of new forage species into the Upper Missouri reservoirs. However, we believe FWP should be clearer and summarily reject any possibility of introduction of new species. On page 29, the third bulleted "goal and objective" seems to say the department is both against the idea, but is also open to the idea. It would be better stated as:

- Control walleye density based upon the availability of forage, manage to protect and enhance the EXISTING forage base, aggressively prevent the introduction of any forage species which do not currently exist in Canyon Ferry and aggressively suppress and eliminate any illegally introduced forage species. Recognizing the current greatly reduced forage base in Canyon Ferry including self sustaining world-class wild trout river fisheries above and below the reservoir system and as precaution against illegal forage introduction, maintain the "no live bait" regulation in Canyon Ferry.

We are puzzled why FWP states that it does not support introduction of new forage species into this system, but then says in the plan it commits to research the literature and review whether "forage introductions may need to be considered" (as on page 27). This language creates an expectation that FWP WILL CONSIDER new species. However, the existing literature and experience in Montana, including at Tiber Reservoir, already demonstrates introduction of new forage species will not work, even if proved to be environmentally benign, which it will not be. In fact, it is more than likely that some of the forage species that could be considered would not only create harmful cascading ecological effects throughout the system, but they would probably conflict directly – instead of benefit – walleyes. That's because many of the potential species such as gizzard shad or cisco will exploit zooplankton, putting them in direct competition for food with juvenile walleyes or salmonid planktivores. By telling the public FWP will still review the possibility of introducing

a new forage fish, the department creates an impression that it might be a good idea. This sends a message to bucket biologists that perhaps forage fish are desirable and if the department decides not to put them in, someone else should.

TU strongly recommends that the new ten-year plan unequivocally and clearly state that no new forage species will be introduced anywhere in the system and any illegally introduced species will be actively suppressed.

FWP Needs to Focus More Closely on Yellow Perch Trends as an Indicator

The preferred alternative goal for number of yellow perch per gill net in Canyon Ferry is to reduce it from 20 down to 10. So FWP is dramatically lowering the goal from the pre-walleye 15-year average of 14.8 yellow perch per gill. This may reflect reality for the food web in the reservoir, but we think the department should establish some cautionary triggers before year three, the point when FWP would change management if the perch catch per net averages less than three fish. Though perch populations can oscillate significantly in the absence of many top-down predators, it's clear that based on pre-walleye history, the magnitude of downward oscillations is dictated by the additional predation pressure. And thus FWP should be prepared to institute emergency regulations – either reduce allowable harvest on perch, or create incentives to harvest more walleyes -- should perch populations plummet much below 8 per gill net in any given year.

Reservoir Operations Must Not Harm River Fisheries

MTU understands how BOR reservoir management can dramatically affect the fishery between the reservoirs and downstream of Holter Dam. It is critical that any consideration of efforts to alter reservoir-fill levels for near-shore habitat, access or any other reason are done so only when protection of the downstream fishery is given priority. The Missouri River fisheries downstream of Canyon Ferry, Hauser and Holter are entirely dependent on quality flows with some mimicking of natural flow regimes for natural spawning and recruitment. The goal of increasing production in the reservoirs through pool manipulation has less demonstrated benefit than that of maintaining normative flows in the river for wild fish. And thus, reservoir management meant to benefit reservoir fish should occur only when it does not pose risk to the river's fisheries.

Montana TU Supports the Proposed Brown Trout Regulations

Montana TU supports the proposed regulation changes aimed at benefitting brown trout. We are disappointed, however, that because of the changes resulting from the illegal introduction and subsequent management for walleyes in Canyon Ferry Reservoir, anglers there will no longer be able to harvest brown trout. It is another opportunity lost because of the desire to manage for walleyes.

Recommendations for Canyon Ferry Reservoir

We believe that much of the key to managing all three reservoirs and the river reaches between them (and potentially below Holter) is related to how Canyon Ferry is managed. Therefore we focus many of our recommendations on Canyon Ferry. FWP should modify its preferred alternative this way:

Maintain the 20 fish limit with 40 in possession for walleyes in Canyon Ferry, but limit the number of larger fish allowed to be harvested above 14" or 20". This might reduce walleye abundance, relieve pressure on the forage base and perhaps still result in more large fish recruited to the older age classes. It makes no sense to us to reduce opportunities for the harvest of walleyes as FWP proposes doing with its preferred alternative. It appears that recruitment of walleyes into the larger size-classes might be density dependent and not related to harvest in the smaller size classes, which FWP seems to be saying when it proposes reducing the harvest and possession limits. It also appears the perch; rainbow and sucker numbers are directly related to the abundance of walleyes in all age-classes. We recommend FWP adopt our proposal and closely monitor population numbers for three years, and consider recommending adjustments to the commission in 2013.

Our recommendation also seems consistent with FWP's observation (on page 30) that more "aggressive management to control walleye population growth" may be necessary. If the goals are more rainbows and bigger walleye, the triggers should be based on a three-year running average, when any two of the following criteria are reached:

- **Walleye density exceeds 4 per gill net.** The 13-year average is 5.8 and the goal is to produce bigger walleye, not more walleye, so the density per net could actually average less than 6. Walleye angler satisfaction seems to be good -- at least according the Townsend Chamber of Commerce -- which reports that 95 percent of all boats launching are fishing for walleye. If walleye angling wasn't good, it seems the angling pressure for walleyes would be decreasing. Because walleye are one of two game species that FWP lists as stable and abundant in Canyon Ferry (out of a total of 11 species), it seems misdirected to focus more on increasing the abundance of these fish in the lower age-classes.
- **Yellow perch density decreases below 8 per gill net.** The 15-year average before walleyes was around 14.8 fish per net, so if walleye numbers are reduced it might be possible to achieve the much-lower-than-historical target of 8 per gill net. In any event, in the period since walleyes were established illegally and then managed as a legitimate species, perch numbers have plummeted, so 8 may what we have to settle for. We note that walleye enthusiasts should be the biggest advocates of higher perch numbers because of the value of this species as forage for walleyes.

- **Rainbow trout density decreases below the 23-year-average of 9 Rainbow trout per net.** When rainbow are abundant, everyone seems to benefit. During most of the 1990s, when rainbows were abundant, Canyon Ferry was a far more popular destination for anglers of all stripes than today. The goals should reflect the historic averages and the benefits that come with this objective.

If FWP adopts the preferred alternative without modifications, we believe the department should evaluate the long-term benefits of continuing or enlarging its current stocking practices. Overall angling pressure, especially that for rainbow trout and perch, in Canyon Ferry is down tremendously from the days when trout were abundant and fingerlings were stocked. This is presumably because opportunities for rainbows and perch are significantly reduced. Walleye angling does not appear to be providing an alternative for many trout and perch anglers. Data shows the average walleye diet in 2006-2008 was one-third salmonids. These findings don't take into consideration earlier data showing that in 2004 70 percent of the diet was salmonids. To continue spending increasing amounts of license dollars and matching federal funds in order to feed an increasing population of walleyes and supply a dwindling number of trout anglers, is something that needs serious evaluation -- especially when we are told there are other needs for hatchery fish elsewhere in the state. MTU recommends if trout numbers cannot be maintained then walleyes should be suppressed to allow for higher trout numbers because more anglers and higher angler satisfaction will result.

Aquatic invasive nuisance species

Montana and the west are seeing the potential of a number of new invasive aquatic nuisance species. It is critical for all the fisheries in the Upper Missouri River system and beyond that we monitor and control these water weeds and diseases aggressively. Montana TU supports the proactive approach the plan takes to responding to this threat.

Toston To Canyon Ferry

Montana TU is a strong proponent of the proposed goals and objectives for managing walleyes on this section of river. Maintaining and improving the wild trout fisheries in this reach should be the continued priority.

HAUSER

The data makes clear there are more walleye in Hauser than can be supported. Because the draft management plan is designed to be dynamic, the best initial course of action is to implement alternative 4 and have no daily bag limits for walleye. This would increase fishing opportunities and have the added benefit of

reducing competitive and predation pressure on other species by reducing the number of walleye in the reservoir. We believe maintaining lower densities of walleyes in Hauser and Holter will create the bottleneck that can offset the effects of walleyes being flushed from Canyon Ferry through the reservoir system.

HOLTER

Protection of the fishery below Holter should be a top priority of this plan. Evidence suggests that the number of large walleye occurring below Holter Dam is increasing. This indicates walleye abundance and reproduction in the three reservoirs might be reaching capacity. Data indicate perch numbers are low, as are kokanee and trout numbers in Holter, while walleye abundances are nearing an all-time high. Our recommendation for Holter is the same as our recommendation for Hauser -- no daily bag limit for walleye. By reducing walleye populations in both Hauser and Holter, a bottleneck could be created to reduce walleye flushing downstream, helping protect the wild trout fishery downstream from inordinate predation pressure from walleyes. As long as walleye abundance in Canyon Ferry is high, there will always be a recruitment source for this species for the other two reservoirs. And thus even with liberal harvest regulations, there will always be an opportunity to catch walleyes in Holter and Hauser.

Fishing Derbies/Tourneys

FWP's proposal for derbies and tournaments seems sound. Montana TU appreciates that the agency includes specific triggers that recognize when fish numbers are low. We believe an additional requirement should be included for tournaments: Each tournament or derby should be required to have an invasive species prevention plan, that includes at a minimum boat inspections by FWP personnel and mandatory boat washing stations. The tournament participants should shoulder the cost for this.

In addition, FWP should consider using tournaments and derbies as tools for reducing the numbers of smaller walleyes, perhaps by requiring mandatory harvest of fish in the small age-classes.

Live Bait

FWP's "goals and objectives" are spot on when it comes to "Live Fish as Bait." Montana TU strongly recommends that FWP follow two of the three strategy recommendations. We understand and see the benefit of the education efforts; however, we are concerned what "investigations" means. Who would be doing the investigations and what it would cost to do them? Basically, we think the use of live bait should continue to be strictly prohibited.

Thank you for the opportunity to comment on this plan. The illegal introduction of walleye into Canyon Ferry has regrettably reduced angler opportunities, reduced the diversity of the fishery and largely led to management dominated by the interest of a singular type of angler. It is something we have already experienced in Montana, to the detriment of our angling culture. At Flathead Lake the introduction of mysis shrimp led to radical changes in the food web and a subsequent dramatic reduction in overall angler use and a simplification of angler opportunities. What was once a diverse fishery with an array of angling opportunities (that included harvest) for cutthroat trout, kokanee salmon, yellow perch, bull trout and incidental catches of lake trout and Lake Superior whitefish has now been reduced to primarily a Canadian Shield type of fishery dominated by lake trout and lake whitefish. We see a similar scenario playing out in the upper Missouri River Reservoir system, especially at Canyon Ferry. FWP would do well to exhaust all reasonable tools before it concedes the system to a simplified fishery dominated by walleyes.

Sincerely,

Mark Aagenes
Conservation Director
Montana Trout Unlimited

Tony Herbert
President
Pat Barnes-Missouri River Chapter
Trout Unlimited