



PO Box 7186 Missoula, MT 59807 (406) 543-0054

12 September 2007

Don Skaar  
Fishery Division  
Montana Fish, Wildlife and Parks  
1620 East Sixth Avenue  
Helena, MT 59620

Re: comments on tentative fishing regulation changes

Dear Don:

Thanks for the opportunity to comment on tentative fishing regulation changes proposed for 2008-2011. These comments are in addition to those submitted by individual Trout Unlimited chapters.

**P. 24. and P. 83.** We support lowering the daily limit for whitefish to 20, and creating a possession limit of 40. We urge the department to increase its monitoring efforts for mountain whitefish populations. We recommend monitoring be especially aimed at waters where winter angling for mountain whitefish is common. Future regulations might be addressed by limiting winter angling.

**P. 24, P. 29 and P. 38.** We support the closures to accommodate removal activities at the Milltown Reservoir site.

**P. 33 and P. 37.** We support the proposed elimination of an extended whitefish and catch-and-release season for trout on the Fisher River and Libby Creek. This will help standardize regulations in Region I and reduce angler confusion as well as enforcement challenges.

**P. 33.** As we have urged in the past, we recommend FWP eliminate the slot limit for lake trout on Flathead Lake. Bioenergetics study and the professional opinion of biologists working on the lake indicate that the slot limit might be protecting a population cohort that consumes perhaps 60,000 native bull trout and cutthroat trout a year, which contradicts the lake co-management plans objectives to stabilize and increase the populations of these native species. This regulation change becomes especially important to consider because the expected harvest of lake trout through tournaments in 2007 indicates that removal measure will be unpredictable if not unreliable.

**P. 34.** Also as we have urged in the past, we recommend that the extended season for angling and harvest of northern pike be extended from December through the third weekend in May. The purported benefit of the proposed regulation of eliminating bycatch of bull trout between March 1 through the third weekend of May is not adequately justified. Our analysis indicates it is more plausible that the foregone potential harvest of northern pike in the early spring will result in additional predation pressure on native bull and cutthroat trout that could very well outweigh the potential losses caused inadvertently by anglers. The difference is that having northern pike in the system that might otherwise be harvested could result in predation that reduces recruitment into older age classes of the native species. The result will be fewer younger fish available as future spawning-age adults, thereby eventually reducing overall abundance of native species.

**P. 35.** We support closing Holland Creek to angling from the mouth of Holland Lake upstream to Holland Falls. This will help protect an important but fragile disjunct population of adfluvial bull trout in a watershed that faces an uncertain future because of a lake trout invasion.

**P. 37.** We strongly support creating a catch-and-release regulation for all cutthroat trout in the Little Blackfoot River and its tributaries.

**P. 41.** Though we don't have a final recommendation on the proposal that allows anglers to keep brown trout of any size in an attempt to reduce competition with bull trout, we wonder if it could increase angling pressure on brown trout which -- if FWP is to be consistent with its justifications for not allowing spring fishing for pike on the upper Flathead River -- means there could be an increase in bycatch of native salmonids in the Thompson River system?

**P. 56.** In the absence of conclusive evidence that harvest will not be inordinate, we support maintaining the regulation that limits angling on the Big Hole River from Dickie Bridge to Melrose Bridge to artificial lures. We are not opposed to bait fishing, but the evidence that the tentative regulation change is necessary is not compelling.

**P. 57.** We support dropping the slot limit on the Big Hole River. We recognize that the biological basis for doing this while also simplifying regulation enforcement is sound.

**P. 57.** We urge FWP to consider closing the Big Hole River between Melrose Bridge and Pennington Bridge from Oct 1 through Dec. 1 to protect spawning brown trout.

**P. 59.** We oppose eliminating the catch-and-release regulation on the Boulder River upstream of Natural Bridge because it appears to be based primarily on observations related to changes in landownership, instead of biological information. If there is a biological basis supported by recent population data and/or angling pressure information, the proposal could be supported.

**P. 62.** We support the proposal to increase the possession limit to twice the daily limit for walleye on Hauser, Holter and Helena Reservoirs. Clearly the targets established for other species – trout and yellow perch – will never be met on all three waters, as we predicted would occur, unless walleye numbers were kept somewhat in check.

Thanks again for the opportunity to comment.

Sincerely,

Bruce Farling  
Executive Director