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29 April 2010

Native Fish Conservation Plan
Attention: Todd Koel
Yellowstone National Park
P.O. Box 168
Yellowstone National Park, Wyoming 82190

Dear Todd:

Thanks for the opportunity to provide scoping comments for the EA Yellowstone National Park is developing for native fish restoration. Montana Trout Unlimited (Montana TU) is comprised of 3,200 conservation-minded anglers, with a majority having a significant interest in wild and native trout conservation in Yellowstone National Park.

We strongly endorse the Park's general interest in securing and improving populations of native fishes. And we support the Park using an array of standard tools for achieving native fish conservation, including well-thought out angling regulation, habitat restoration, installation of barriers to movement of undesirable species, electrofishing, piscicides and long-term monitoring of presence, population size, species distribution and genetic characteristics. We recommend the Park consider the following in development of its native fish conservation priorities and environmental analysis:

1. Continue to make lake trout suppression in Yellowstone Lake the top priority for native fish conservation. However, modify the suppression effort to reflect findings from the report prepared in the wake of the scientific conference that was convened in August 2008. Among these findings were recommendations to utilize commercial gillnetters for removal, and to have Park Service staff focus on monitoring and research. The Park should develop a suppression plan that takes into account new methods for gillnetting as well as gillnetting location and timing. Further, the Park should support research that investigates alternatives to gillnetting, as well as maintain a regular dialogue with fishery managers who are removing lake trout in other western lakes.
2. Evaluate the potential for increasing research to better pin down the relative impacts to native fish of lake trout predation, whirling disease and reduced streamflows in key spawning and rearing habitats.

3. Continue the Specimen Creek project for westslope cutthroats, and continue working on a proposal for restoring westslope cutthroat and fluvial grayling in the upper reaches of Grayling Creek.
4. Evaluate the possibility of developing – for lack of a better description – a fishery zoning plan, in which the Park will endeavor to dedicate certain waters to native fish conservation, and others to maintaining wild introduced species. This evaluation should determine which waters currently harbor important populations of native grayling, westslope cutthroat trout and Yellowstone trout, as well as those waters where restoration of these species is practical within a 10-20 year time frame. This evaluation should evaluate where native fish might better persist under a shifting climate regime that promises one of three scenarios: 1.) warmer temperatures and less precipitation; 2.) warmer temperatures and more precipitation, but primarily in the form of rain; and 3.) warmer temperatures with the same amount of annual precipitation measured, on average, in recent years, but more of it in the form of snow. These are the highest probability scenarios most climate scientists predict for the Rocky Mountain Region.
5. We recommend the Firehole and Madison Rivers continue to be managed for wild introduced species, such as rainbow and brown trout. We also recommend that native fish strongholds be developed in the upper Gallatin, Madison and upper Yellowstone River tributaries, the latter to include at least waters in the Soda Butte Creek and the Lamar River watersheds.
6. Angling regulations should be evaluated for their potential to measurably improve native fish populations, be comprehensible to a public with a widely varying education level, and be practical.
7. Evaluate all data collection and research projects – including those of the Park Service and involving other agencies, academia and the public -- for their ability to contribute to management options that provide practical options for native fish conservation.
8. Establish long-term population surveys for key native fish waters.
9. Evaluate the relative value of periodic, statistically rigorous angler surveys, such as creel censuses, as a replacement for inferences drawn from volunteer angler cards. We recommend the Park evaluate options that inform it better as to angler preferences, pressure and education about Park fishery resources.

We look forward to evaluating the Park's EA for native fish conservation. And as always offer the resources of Montana Trout Unlimited and our chapters for help on discrete projects that benefit native fish in Yellowstone National Park.

Sincerely,

Bruce Farling
Executive Director

