



August 4, 2000

John Fraley  
Montana Department Fish, Wildlife & Parks  
490 N. Meridian Rd.  
Kalispell, MT 59901

Dear John:

The Montana Chapter of the American Fisheries Society would like to thank you for the opportunity to comment on your Flathead Lake and River Fisheries Management plan. We applaud your Department and the Confederated Salish and Kootenai Tribes combined efforts to restore native fish to their original habitats.

The Montana Chapter of AFS is deeply concerned about the decline of native fish species within this great State. We believe that their survival is paramount, and efforts to restore them to historical numbers and habitat, or at least to long-term sustainable populations levels, should take precedence over current non-native sport fisheries. The native fishery of the Flathead Lake Basin represents a unique biological and cultural resource that can never be replaced. To a very large extent, the responsibility to ensure that this native fishery does not slip further toward extinction rests with the co-managers (FWP and CSKT). Nevertheless, we do understand your desire to maintain a viable recreational fishery in the basin. If that fishery is based on restored populations of westslope cutthroats and bull trout, then both the public and the fish will benefit.

While the Chapter supports your strategy of adaptive management, there are several assumptions and conclusions within the plan that need defining, if not explaining. For instance, other than use of the word "restore", what is the difference between Options#1 & #2, other than slightly increasing the reduction of lake trout? Neither of these options appears to protect or to restore native fisheries. They apparently attempt to appease the lake trout fishing community. In as much as the current "liberal" limits on lake trout have not restored native fish numbers, how would a modest reduction in the number of small lake trout positively affect native fish?

Options#3 & #4 both assume that Mysis and nonnative fish limit native fish numbers. Both are

proposing a more aggressive reduction of lake trout, hoping that cutthroat and bull trout numbers will increase, and thus support the recreational fishery. While the data appears to support this theory, we question whether redd counts can and should function as the sole biological indices for recovery. Some evidence indicates that redd counts may have only limited power to detect population trends. We urge the use of additional population indicators.

We are also concerned that Option#4's minimal threshold of 100 bull trout redds is too precarious. At that level the "more aggressive management steps" you propose implementing may be too little too late. Throughout the Plan, we detect a need for better information on status, trends and interactions of both native and non-native fisheries. In lieu of sound scientific data, we feel managers must act conservatively to protect native fish populations. We strongly recommend that you significantly increase the minimum redd threshold to provide a greater margin of error, i.e., a safety net for bull trout.

It is our understanding that an independent expert panel of scientists recently recommended a major reduction in the lake trout population to facilitate bull trout recovery in the Flathead Basin. We feel there should be some discussion in the Plan of these important findings, as well as an explanation of how they have been considered or dismissed in the development of the four options.

We strongly support strategies 2 – 8 listed in each option. Proactive approaches to management, habitat, water quality, education, and enforcement will undoubtedly help the plight of the westslope cutthroat, as well as generally improve the quality of the aquatic resources.

In summary, the Montana Chapter of AFS feels the Draft Plan should provide an option that more fully supports the restoration of native bull trout and westslope cutthroat trout in the Flathead Basin, using management strategies that err on the side of promoting these fisheries, even if there are some negative consequences to non-native species.

Thank you for entertaining these comments. If you have any questions, please feel free to contact me at 388-1888.

Sincerely,

Buddy Drake  
President  
Montana Chapter of the American Fisheries Society

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