



October 18, 2000

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

Dear John:

Although we have not been able to conduct as in-depth a review as we would have liked due to the short comment period, we have examined the current “final” draft of the Flathead Lake and River Fisheries Co-Management Plan (hereafter “Plan”) and have the following comments.

We applaud the innovative and adaptive processes used in the development and proposed implementation of this Plan, but we are troubled by the limited roles imposed on biologists during Advisory Committee meetings. These biologists are Chapter members with sincere, professional involvement in native trout management in the Flathead Basin. Even when involved biologists disagree over management strategies, there should be some forum for open scientific exchange in this process. We can see no value in insulating citizen advisors from objective biological review during the formulation of management options. We also do not understand why the Plan makes no mention of the 1997 Expert Panel findings concerning restoration of the Flathead Lake bull trout fishery.

To begin with, we feel a more thorough discussion of the consequences that lake trout and other non-native fish have had on native trout throughout the entire interconnected Flathead Basin should have been included in the introduction. This would have helped establish the seriousness of the current crisis and the need for decisive actions to halt or reverse these trends before irreplaceable native fisheries are lost forever. We can appreciate the difficulty of including all upstream lakes in this Plan but nevertheless feel the lack of an ecosystem perspective is a serious shortcoming. At least some discussion of the Plan’s implications for upstream lakes could have been included.

It concerns us that the guidelines given to the Advisory Committee were either too vague or lacked an adequate biological basis. We can find no other explanation for the Committee’s development of at least two options which no knowledgeable biologist could reasonably believe would restore a healthy bull trout population to the Basin. Even the stated objectives of increasing native trout to secure levels while maintaining the recreational fishery for non-native fish seem contradictory. We

must ask what scientific evidence suggests this objective is obtainable? Are there any North American lakes where native bull trout are persisting at secure levels in spite of lake trout and *Mysis* introductions? We wonder how a “viable” population of lake trout (including a stockpile of trophy-size fish) can be maintained in the present system while also promoting recovery of bull trout and westslope cutthroat trout.

These assumptions may create unreasonable or potentially disastrous public expectations of the fishery. For example, is it realistic to fire up the angling community for an all-out pursuit and harvest of small lake trout, and then after lake trout populations have been curtailed, expect the same anglers to be appeased by harvest of other species or catch-and-release fishing for native trout? There are many examples of non-native fisheries supporting much higher harvest levels than previously-existing native fisheries could support, and we think the risk of over-selling the resource is significant in the Flathead system. Nevertheless, it seems to us that the potential for fully restored native trout populations to provide a viable recreational fishery is inadequately explored. We are also concerned that hooking mortality of non-targeted bull trout is not sufficiently addressed under the increased fishing pressure scenario, especially if the bull trout population begins to respond favorably to the Plan’s strategies.

On the subject of *Mysis*, we found the Plan to be confusing. How can reductions in small lake trout and lake whitefish populations be compatible with any goal of controlling *Mysis*? Unless there is potential for controlling *Mysis* through some other means, and thereby limiting food for the non-native fish, these conflicting suggestions only detract from the Plan’s biological credibility. We would prefer to see more frank discussions of the Flathead system’s biological and management limitations throughout the document.

Two management responses in the table on page 5 are especially troubling to us. If bull trout increase and lake trout decrease, why would you want to risk this recovery by reducing harvest of lake trout? This seems

premature and counterproductive. In the same context, if bull trout stabilize (at current low levels?) and lake trout decrease, why would you want to back off on the harvest of lake trout? Isn’t it more rational to expect further reductions in lake trout to lead to actual increases in bull trout? The outlined management actions are much more likely to ensure that bull trout recovery never occurs. Meanwhile, it appears that the lake trout fishery will be protected under all scenarios despite the consequences to native trout -- a complete contradiction of the Plan’s stated objectives.

We remain supportive of the adaptive management approach outlined in the Plan, but we believe it is important to acknowledge that social and political forces can circumvent this strategy. The public may be unwilling to accept certain changes in fishing opportunities regardless of the biological basis for them. Therefore, we think every effort should be made to emphasize the experimental nature of these actions and to avoid the perception that a “status quo” fishery is sustainable under the present circumstances.

Equally important to an effective adaptive management strategy is the identification of substantive, measurable goals and decision points. While there are some goals for recreational use levels, the Plan is largely lacking in quantifiable goals for the native trout fishery, especially westslope cutthroat. Without better definition of goals and decision points, how will managers know whether actions have been effective and when or if to change direction? It is our hope that the Plan will be strengthened with the addition of these components as soon as possible.

Although we understand the logic of a slow, conservative approach to management changes for the lake and river fisheries, we must ask how long the Flathead's bull and cutthroat trout can afford to wait for relief from non-native fish. FWP and CSKT acknowledge that native trout populations may not be at secure levels but do not propose any triggers for emergency actions to save them from sliding toward extinction. If such indices and actions can not be developed with current information, they should at least be part of the objective for determining and ensuring secure population levels. In that regard, we would caution against relying too heavily on redd counts for assessing bull trout populations. Your own biologists are well aware of the pitfalls in that approach, especially the problem of lag times and the risk of not detecting a population crash in time for corrective actions. We know that FWP and CSKT have competent biologists who also understand the importance of juvenile abundance and habitat condition indices for evaluating the status of native trout populations. We hope the managers will listen to them and other involved scientists in the Basin.

The discussion of Strategy 5A (page 23) seems to imply that lake trout numbers will be reduced only until the bull trout population reaches a secure level. This suggests that the bar for success is being set at the lowest possible level rather than closer to true restoration. What assurance is there that the new management goal for bull trout (and cutthroat trout?) will be anything more than the minimum population required for security? If this indeed becomes reality, the native trout fishery of the Flathead will be just another remnant of Montana's natural heritage. In the same context, we do not believe it is prudent to allow native trout populations to "drop to dangerously low levels" before more aggressive lake trout suppression efforts are "reviewed and proposed for implementation" (page 25). This would surely add significant delays that could preclude any effective responses.

In summary, we recognize the difficult challenges that FWP and CSKT face in resolving the "complex biological and social issues regarding fisheries management" in the Flathead system, but we believe it is imperative that biological limitations and likely consequences of proposed actions be described as objectively as possible. We also acknowledge the many disagreements, controversies and uncertainties within the Flathead Basin's scientific community, but feel this is all the more reason for a management approach that errs on the side of native trout if maintaining that resource is truly a major objective. In this Plan, we sense a strong desire to develop "win/win" solutions for the most contentious issues over native versus non-native fisheries. We question whether such an outcome is achievable given the dire situation these native trout are in. If user groups, elected officials, agency directors or the general public find more decisive native fish

restoration strategies to be unacceptable, then they should at least be told that lesser actions will most likely fail.

Sincerely,

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