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Montana Fish, Wildlife & Parks Commission
1420 East Sixth Avenue
Helena, Montana 59620

Dear Commissioners:

The Montana Chapter of the American Fisheries Society (MCAFS) appreciates the opportunity to comment and provide scientific information regarding the recent proposal to stock sterile walleye west of the Continental Divide, thereby lifting the 1989 ban by the Montana Fish, Wildlife & Parks (FWP) Commission. One of our objectives is the conservation, development and wise utilization of Montana's fisheries. We are keenly interested in the conservation of native and recreational fisheries in Montana, and we believe that the proposal will compromise our mutual objectives.

MCAFS is adamantly opposed to stocking sterile or fertile walleye anywhere west of the Continental Divide, including closed-basin lakes. We support maintaining the existing ban on stocking walleye west of the Continental Divide, and strongly urge the Commission to reject the current stocking proposal.

As you are aware, in 1989 an Environmental Assessment (EA) was completed to assess the potential impacts of walleye introductions beyond their current range in Montana. Due to unsuitable habitat conditions, potential impacts to recreational and native fisheries, and other available opportunities to improve or develop walleye fisheries within their current range, it was concluded that it was not prudent or necessary to expand the range. Accordingly, the FWP Commission voted to set a policy of no stocking of walleye west of the Continental Divide due to biological and social concerns. The biology of walleye and the aquatic environments on the west side has not changed since the 1989 EA. It may appear, however, that social demands have changed due to a vocal minority. We believe that a policy change of this magnitude based on social demands would set a dangerous precedent for future management of fish and wildlife in Montana, and result in deleterious impacts to aquatic ecosystems. Therefore, we urge the Commission to use the best available scientific information to ensure the long-term health and persistence of Montana's fisheries resources, and thus reject the proposal to introduce an exotic, top predator into western Montana.

Currently, there is no proven procedure to produce 100% sterile walleye. This is a major limitation because the proposal is founded on the fact that sterile walleye will be used for introductions in western waters. Female adult walleyes produce approximately 25,000 eggs per pound, which has proven to be more than enough reproductive capacity to cause significant impacts on existing fisheries, including Canyon Ferry Lake. Therefore, if a few fertile fish are accidentally released in a given water body, because there is not a 100% success in sterility procedures, there could be significant impacts to other waters. This threat is exacerbated by the high rate of illegal fish introductions in western Montana.

Introduction of walleye will provide a source for additional illegal introductions that have already impacted fish populations and aquatic ecosystems. Introductions of walleye elsewhere have displaced native fish species and ultimately impacted sport fisheries for other species, primarily due to increased predation and competition. Science has demonstrated that non-native fish introductions are a primary cause of declines in fish abundance and diversity throughout Montana and worldwide. The bull trout is currently listed under the Endangered Species Act (ESA) and the westslope cutthroat trout is classified as a species of special concern. Both fish have declined due to habitat loss and negative interactions with non-native fish species. The proposed walleye stocking proposal may jeopardize or delay bull trout recovery efforts (i.e., delisting) and may result in listing westslope cutthroat trout if populations are impacted and continue to decline.

A major problem of introducing walleye west of the Continental Divide is that people will likely move them to other waters illegally. In Region 1 alone, FWP has documented 251 illegal fish introductions into 134 waters, which is more than half the 466 illegal introductions to 266 waters statewide. Further, despite the existing ban on stocking west of the Continental Divide, walleye have been illegally planted in eight waters in Region 1 and 2, including Lake Five, Noxon Rapids Reservoir, Milltown Dam, the Clark Fork below Milltown Dam, Placid Lake, Salmon Lake, Church Slough (Flathead River) and the Bitterroot River. In Noxon Rapids Reservoir, the walleye population is apparently reproducing and self-sustaining. Therefore, legal introductions will likely result in additional illegal introductions (i.e., bucket biology) that will decrease FWP's ability to effectively and efficiently manage our fisheries, cost millions of dollars in restoration, such as the costs incurred with perch in Lake Mary Ronan, and result in further population declines of native species, including the threatened bull trout and westslope cutthroat trout.

The biology of walleyes makes them poorly suited for most waters west of the Divide. Walleye require large bodies of water (over 250 acres) that contain abundant near-shore habitats to complete their life cycle and forage base requirements. Water bodies that are suitable for viable walleye populations should include closed-basin lakes (250 acres or larger) that have sufficient habitat, including, moderate to high productivity, a good forage base, and no salmonids, species of special concern, or recreational fisheries that could be impacted. However, there are few closed-basin lakes that satisfy these criteria, but most of these lakes already have productive sport fisheries that will likely be adversely impacted. In Region 1, only 2 potentially suitable lakes have been identified, Spar (382 acres) and Echo (674 acres) Lakes. Spar Lake (situated at 3300 ft. elevation) is an oligotrophic lake (low productivity) with steep bank drop-offs (limiting the amount of

shoreline habitat) and already supports a popular salmonid fishery. Echo Lake is shallow productive lake that supports an extremely popular largemouth bass fishery that would likely be jeopardized by the establishment of walleye. Therefore, according to the stocking criteria, there are few opportunities for walleye introductions in Region 1 and elsewhere in western Montana.

Despite the proponent's claims, introductions of walleye may not benefit local economies and create fishing opportunities. In Montana, Canyon Ferry Lake provides a good example of the potential economic loss from introducing non-native walleye into a water body. There is a misperception that the walleye boom in Canyon Ferry Reservoir has increased fishing pressure and benefited the local economy. In fact, fishing pressure has not significantly increased during the walleye boom because spring, fall and winter fishing for perch and trout has declined substantially due to walleye predation on these popular sport fish. There were approximately 92,000 angler days of fishing use on Canyon Ferry in 2003, compared to over 100,000 angler days when trout and perch were at their peak in the 1980's. Also, there were about 65,000 angler days in early 1990's when trout fishing was poor. Canyon Ferry Lake does not show benefits to local economies and fishing opportunities at this time.

An assessment of new forage species introductions needs to be considered in tandem with the walleye proposal, because walleye advocates will likely request forage fish introductions in the future. Additionally, walleye are known to devastate forage fish communities (including yellow perch). This often results in a diminished overall fishery and creates a need to expend more money on supplementation. Forage fish stocking requests (i.e., spottails, cisco, smelt, gizzard, shad etc.) usually follow closely on the heels of walleye introductions due to unrealistic expectations by the angling community. The impacts of walleye on existing fish communities are usually profound and measurable within 5 to 10 years. Based on experiences in Wyoming, Al Conder of Wyoming Game and Fish advised Montana to stay with basics and stress the concept of the trophic pyramid. This will be especially useful in the relatively unproductive waters in the west.

Finally, we believe that the Commission should carefully consider the recommendations of fisheries experts throughout Montana. The people of Montana rely on state and federal officials to make wise decisions on the use of our fisheries resources to provide recreational fishing opportunities and conserve native fishes for future generations. The FWP Fisheries Division supports the existing ban on walleye plants west of the Divide. FWP's recommendation should be carefully considered, as they are the experts in fisheries management and follow a clear mandate to protect and conserve native fish and provide recreational fishing opportunities. Past experience has shown that non-native species introductions can devastate local fisheries in Montana, such as walleye in Canyon Ferry, lake trout in Flathead Lake, and northern pike in the Clearwater Chain of Lakes, to name a few.

Thank you for your interest and mandate to manage and conserve our fisheries resources in Montana, as the decisions made now will influence these important conservation areas for future generations. The proposal to stock walleye west of the Continental Divide should be rejected for the biological, economic, and social issues and concerns addressed in this letter. We urge you to

consider our recommendations to conserve native and sport fisheries in western Montana. Thank you for the opportunity to comment, and we look forward to providing oral comments at the Commission meeting in Missoula on September 8, 2004.

Sincerely,

Clint Muhlfeld
President, Montana AFS

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