

Response to Public Comments

Overview

Public comment was requested for the draft 2020-2019 Upper Missouri River Reservoir Fisheries Management Plan which was presented to the Fish and Wildlife Commission on October 17, 2019. The public comment period was October 17 – November 17. FWP received comments from 37 individuals, some of which represented organized fishing organizations. Organizations submitting comments were Walleyes Unlimited of Montana and Montana Trout Unlimited. Comments received pertained to Part III of the draft Plan and most comments were in response to walleye management in the reservoir section (Part III – B) of the draft plan.

General Comments and FWP Response

Comments received were summarized or paraphrased and categorized below. Below the summarized comments are FWP's responses. The tables below contain only a portion of the submitted comments and/or contain highlighted areas that focus on a specific topic. Tables are organized by general topics, with 8 total general topics. The column to the right of each comment contains a number that references FWP's response to the comment. Comments that do not contain actionable items might not have a response. Duplicated comments are omitted in the tables below but were tallied as part of the overall enumeration of comments. Copies of the full comments were also submitted to the commission in a separate document.

Table 1: Number of comments received by general topic. Comments were organized into 8 general topics.

Topic	Number Comments
River Management	9
Trout Management	2
Yellow Perch Management	12
Walleye Management	32
Forage	7
Northern Pike	2
Fishing Contests	2
Recreation Management	1
Total	66

Part III – A (River Sections)

River Management Comments

A total of 8 comments related to river management and the 8 comments all categorized as maintaining the coldwater species management component of the UMRRFMP.

Comment	Response
Maintain a coldwater species management component in the UMRRFMP area River Sections (8 comments).	1)

FWP Response to River Management Comments

Response Number	Response
1)	Coldwater species management strategies and goals for rainbow and brown trout are currently incorporated and management of those species, including an emphasis on wild trout, are integral components of the 2020-2029 UMRRFMP.

Part III – B (Reservoir Sections)

Rainbow Trout Management Comments

A total of 2 comments mentioned issues directly related to rainbow trout management in the reservoirs.

Comment	Response
The quality of fishing below Canyon Ferry is progressively declining, consider stocking different rainbow trout strains and locations, specifically below Canyon Ferry Dam. (1 comment)	1)
Consider decreasing the daily limit on trout downstream of Canyon Ferry Dam (1 comment)	2)

FWP Response to Trout Management Comments

Response Number	Response
1)	A budget shortfall in 2016-2017 resulted in a 19-24% reduction in stocking catchable sized (>7-inches long) rainbow trout in Hauser Reservoir from 2018-19. Historic stocking rates of 100,000 Arlee and Eagle Lake strain rainbow trout are scheduled to resume in 2020. In addition, angler catch rates, based on annual creel surveys on Hauser Reservoir, in 2018 were 0.22 fish per hour for general anglers and just below the current (2009-2018) ten-year average of 0.26 fish per hour (range 0.17-0.36 fish per hour). Recent creel survey values identify values just below catch rates widely considered as good catch rates (0.25 fish per hour) but do not currently indicate significant declines in rainbow trout catch rates in Hauser Reservoir. However, strain and stocking level evaluations will continue to remain an integral part of annual standardized monitoring and evaluations.

APPENDIX E

2)	All species managed in the 2020-2029 UMRRFMP, including trout, are evaluated annually based on species-specific management strategies and management change recommendations (i.e. regulation changes) may occur annually if applicable. Additionally, the 2020-2029 UMRRFMP enlists a Citizens Advisory Committee (see Appendix C in the plan) to evaluate potential recommended management decisions for the duration of the UMRRFMP.
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Yellow Perch Management Comments

A total of 12 comments mentioned issues directly related to yellow perch management.

Comment	Response
Decrease the current yellow perch regulation in Holter Reservoir. (7 comments)	1)
Stock and explore habitat enhancement projects for yellow perch in Canyon Ferry Reservoir. (2 comments)	2)
Increase FWP enforcement of fishing regulations specifically related yellow perch in Holter Reservoir. (2 comments)	3)
On page 24 bullet 1 states “Continue conservative harvest regulations”. The current perch limit of 50 is not conservative. (1 comment)	4)

FWP Response to Yellow Perch Management Comments

Response Number	Response
1)	<p>All species managed in the 2020-2029 UMRRFMP, including yellow perch, are evaluated annually based on species-specific management strategies and management change recommendations (i.e. regulation changes) may occur annually if applicable. Additionally, the 2020-2029 UMRRFMP enlists a Citizens Advisory Committee (see Appendix C in the plan) to evaluate potential recommended management decisions for the duration of the UMRRFMP.</p> <p>*Note – FWP recommended a regulation change for yellow perch in Holter to the Fish and Wildlife Commission on November 12th, 2019. That recommendation, reducing the current regulation (50 daily, no possession limit) to 25 daily and in possession, was approved for public comment. Public comment for the above proposed regulation was open from November 12-21, 2019.</p>
2)	The 2020-2029 UMRRMP is committed to exploring unique ways to enhance yellow perch populations throughout the UMRRFMP area. The Final UMRRFMP states “...explore additional yellow perch habitat enhancement opportunities (e.g., artificial habitat, stocking or transferring fish).”
3)	Four Helena area FWP Game Wardens and one Townsend area FWP Game Warden provide year-round patrols throughout the UMRRFMP area. Game Wardens conduct routine vehicle patrols and boat patrols as well as numerous ice-fishing patrols in the winter. Wardens also dedicated more effort to UMRRFMP area waters in recent years due to the need for increased Aquatic Invasive Species enforcement since 2016. In addition, a review of FWP’s 1-800-TIPMONT database, which allows the public to report game violations, revealed few, if any, reports of angler over-harvests throughout Southwestern Montana.

APPENDIX E

4)	Removed the word “conservative” from the referenced sentence as it doesn’t provide decisive description of a regulation.
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Walleye Management Comments

Walleye management received the most comments. A total of 32 comments mentioned issues directly related to walleye management.

Comment	Response
The draft states that if goals are met additional aggressive walleye management actions may be implemented, why would further action be needed if goal range was reached (draft page 26; bullet 4)? (6 comments)	1)
Delete bullet 3 on page 26 because it limits management alternatives and only leaves the option to further suppress walleye numbers without consideration of relative abundance or condition factors. (5 comments)	2)
Walleye management strategies as described (draft page 25, All Reservoirs bullet 1; page 26, bullet 5) limit potential walleye management changes by connecting management criteria to other managed species (e.g., yellow perch). As written, this needs review, revision or deletion. (3 comments)	3)
Should not consider active walleye management measures based only on primary forage fish relative abundance. This should be tied to walleye condition factors and relative weights of walleye. (3 comments)	4)
Walleye were planted in Lake Helena, not Hauser Reservoir, in 1951 (page 20, 1 st paragraph). (1 comment)	5)
Paragraph 3 on page 20 of the draft inaccurately depicts walleye abundances and size structures and is misleading and should be revised. (2 comments)	6)
Remove or further clarify statement “predation by walleye further reduces recruitment of successfully reared fish” (1 comment)	7)
On the draft page 25, regulation changes should be made after considering relative abundance and PSD goals for walleye along with relative weights and condition factors and growth rates. If changes are considered only when all goals are met it practically states that no change to walleye limits will ever occur. (2 comments)	8)
On the draft page 21 the current data doesn’t suggest that walleye have a high preference for trout. (2 comments)	9)
Generally, management strategy language related to walleye throughout the Draft Plan, as written, needs review, revision or deletion. (3 comments)	10)
Modify the current walleye regulations either the number or additional size restrictions. (4 comments)	11)

FWP Response to Walleye Management Comments

Response Number	Response
1)	The bullet point in question was written in a way that created confusion and as a result was taken out of context (reference in the draft was to the 3 criteria immediately above). For clarity bullet 4 of page 26 on the draft was deleted and for additional clarity text was inserted stating that separate actions would be needed for additional management actions.

APPENDIX E

2)	The bullet point and associated sub-bullet points were deleted from the Plan to avoid limitation of management alternatives.
3)	Relevant to the comments that were received, revisions have been incorporated into the Plan. The revisions removed specific reference of walleye management changes that were entirely dependent upon management criteria of other managed species.
4)	Revised the bullet point in question and provided additional text that would consider additional walleye management if walleye were identified as a primary limiting factor. Additionally, the 2020-2029 UMRRFMP enlists a Citizens Advisory Committee (see Appendix C in the Draft) to evaluate potential recommended management decisions for the duration of the UMRRFMP. The committee would review all relevant data (including relative weight).
5)	Revision to the original walleye stocking location was made to the Plan. Additional text was inserted stating that supplemental walleye stocking occurred in Hauser Reservoir.
6)	Revised the text to more accurately describe abundance and walleye forage correlation and subsequently affected growth and size distribution.
7)	Naturally spawned fish are within gape limitations of walleye, therefore as the sentence states; predation by walleye further reduces recruitment of these successfully reared fish.
8)	The referenced paragraph was revised to increase the ability to make regulation or management changes if necessary.
9)	Current rainbow trout stocking plans are to stock rainbow trout 7" or greater to decrease the probability that these stocked fish are consumed by predators. If the minimum size at stocking was decreased, thereby putting the stocked rainbow trout within the gape limitations of majority of the walleye, the smaller rainbow trout would be consumed at greater frequency than the referenced recent data.
10)	If applicable, proposed revisions to the comment above have been incorporated into the Final Plan.
11)	All species managed in the 2020-2029 UMRRFMP, including walleye, are evaluated annually based on species-specific management strategies and management change recommendations (i.e. regulation changes) may occur annually if applicable. Additionally, the 2020-2029 UMRRFMP enlists a Citizens Advisory Committee (see Appendix C in the Draft) to evaluate potential recommended management decisions for the duration of the UMRRFMP.

APPENDIX E

Forage Comments

A total of 7 comments mentioned issues directly related to forage.

Comment	Response
Consider other walleye population evaluations when evaluating forage fish management strategies (page 29; All Reservoirs, bullet 2). As written, this needs review, revision or deletion. (1 comment)	1)
Improve forage or introduce additional forage species (e.g., cisco) to benefit walleye in waterbodies throughout the UMRRFMP area. (6 comments)	2)

FWP Response to Forage Comments

Response Number	Response
1)	Revised the bullet point in question and provided additional text that would consider additional walleye management if walleye were identified as a primary limiting factor. Additionally, the 2020-2029 UMRRFMP enlists a Citizens Advisory Committee (see Appendix C in the Draft) to evaluate potential recommended management decisions for the duration of the UMRRFMP. The committee would review all relevant data (including relative weight).
2)	Introduction of new fish species could have negative effects on the trophic dynamics not only in the reservoirs, but also within the entire Missouri River system. A review of potential species (2010-2019 UMRRFMP; Appendix B) that may be appropriate for introduction show that many species would be of little to no benefit to walleye. Depending upon the species, there is great potential that forage fish would have negative effects to the species it was stocked to benefit. Changes to the food web and trophic dynamics within the system could jeopardize natural reproductive success.

Northern Pike Comments

A total of 2 comments mentioned issues directly related northern pike.

Comment	Response
Support ongoing suppression efforts for norther pike. (1 comment)	1)
Leave northern pike alone. (1 comment)	2)

FWP Response to Northern Pike Comments

Response Number	Response
1)	Actions will continue as described in 2020-2029 UMRRFMP and additional information found in Appendix E.
2)	Forage is limited in the reservoirs and subsequently actions will continue as described in 2020-2029 UMRRFMP. Additional information found in Appendix E.

Part III – C (Other Management Issues)

Fishing Contests

A total of 2 comments mentioned issues directly related to fishing contests.

Comment	Response
Consider permitting no more fishing contests or only add a tournament if one is discontinued. (1 comment)	1)
If fish abundance is low why allow the perch derby on Canyon Ferry? (1 comment)	2)

FWP Response to Fishing Contest Comments

Response Number	Response
1)	Fishing contests for all reservoirs within the UMRRFMP are evaluated based on many criteria within the Plan. The following fishing contest management strategy directly relates to the comment above: Regulation of contests will account for the need to distribute tournaments evenly throughout the year and provide for angling opportunities on the reservoir free from contests. A maximum of 12 contests per year of any type (open water angling, ice fishing, bowfishing, etc.) will be permitted. More than one contest will not be permitted for the same day and contests will not be approved for consecutive weekends in order to minimize the potential for conflicts. Applications will be considered on a first come basis until all available slots are filled.
2)	The plan advises allowing one competitive fishing event in January. The department will continue to work with tournament organizers to minimize impacts from this competitive fishing event.

Recreation Management Comments

A total of 1 comment mentioned issues directly related to recreation management.

Comment	Response
Institute a system so that there are designated stretches and days open to guides such as is being done on the Big Hole. (1 comment)	1)

FWP Response to Recreation Management Comment

Response Number	Response
1)	The department recognizes the potential for conflict between recreational users in the river below Hauser Dam and will carefully consider any restrictions to commercial use or to general anglers.