

Rest and Rotation

On August 13th, 2020, the Montana Fish and Wildlife Commission (Commission) approved two petitions for a Madison River Recreation Plan to go out for public comment to help determine final management tools to be implemented on the Madison River in 2021. The Fishing Outfitters Association of Montana (FOAM) and the George Grant Chapter of Trout Unlimited (GGTU) were the organizations that put forward the two petitions approved by the Commission.

FOAM's petition proposes a commercial use plan that will permanently cap commercial use at 2019 or 2020 levels. This cap would allow for transferability of use days among outfitters, as well as provide opportunity for entry for new outfitters and growth for existing outfitters while keeping commercial use within the overall cap. FOAM's commercial use plan was drafted in part by drawing on our efforts and knowledge gained in participating in the Negotiated Rulemaking Committee (NRC) that was established by the Montana Department of Fish Wildlife and Parks (FWP), as well trying to improve on the shortcomings of other recreation plans in use on other rivers in the state, including the Big Hole, Beaverhead, and West Fork of the Bitterroot rivers. Our time spent participating in the NRC process was critical in the development of our plan, as it provided insight into how commercial users operate on the Madison River, but also how noncommercial users recreate on the Madison. These insights made it clear to FOAM and others what management tools would work best on the Madison River to provide potential solutions and not negatively impact other user groups substantially. FWP has several management tools at its disposal, and each one offers a unique method of dealing with the myriad of issues that led to the necessity of a recreational management plan being implemented.

The petition presented by GGTU expresses a need to cap commercial use on the Madison River, and it voices approval for the FOAM commercial use plan, including FOAM's proposed no-cost, no-limit Madison River Use Stamp for noncommercial users, which will gather necessary data on how noncommercial users are recreating on the Madison.

GGTU's petition also calls for implementation of Rest and Rotation on the upper Madison as a management tool. This approach would prohibit commercial use on the Lyons Bridge to Palisades reach on Sunday and Varney Bridge to Ennis FAS on Saturday from 15 June to 30 September. No other Rest and Rotation regulation on any other river in the state of Montana extends for this length of time. This schedule closes a section of river daily to residents of Montana who choose to use the services of a guide or outfitter as well as to non-residents, whether they fish on their own or with the services of a guide. GGTU was instrumental in developing a recreation plan for the Big Hole and Beaverhead in 1999, and they see the implementation of Rest and Rotation as a success on these rivers - a conclusion which is still debated. But the Madison is very different from the Big Hole. The Big Hole River offers roughly 102 miles of floatable water for angling, compared to only 37.6 miles on the upper Madison. Further, when Rest and Rotation was implemented on the Big Hole River, it was estimated to have 80,000 angler days for both commercial and noncommercial users. During 2017, noncommercial use on the upper Madison River was 207,000 angler days, climbing to an estimated 249,000 angler days in 2019, a 42,000-user day increase in two years. In 2 years, the number of non-commercial angler days on the upper Madison River increased by more than the total commercial angler days combined. GGTU did not have a representative as a participant on the NRC. This is unfortunate, as participating in the NRC process

may have provided them more thorough understanding of the uniqueness of the upper Madison River and the important differences between the Madison and the Big Hole Rivers.

FWP's own data shows that the fastest growing user group on the upper Madison River is the non-commercial angler. Gallatin County is the fastest growing county in Montana (a 37% increase since 2000), and it is immediately adjacent to the Madison River, so it is reasonable to presume it is the major source of non-commercial use on the river. How would Rest and Rotation management on the Madison River alleviate crowding into the future on a river where non-commercial use is growing at over twice the rate of commercial use?

Rest and Rotation will not provide the desired outcome of alleviating social crowding, but it will undeniably condense members of the general public who choose to use the services of a guide or outfitter into a stretch of the river that would be reduced by 22%. GGTU's failure to recognize the different physical characteristics, documented angler use, and the Madison's proximity to a rapidly growing population centers is showcased by their effort to implement Rest and Rotation on the upper Madison River. When asked directly "How will Rest and Rotation sections provide for a better experience for non-commercial users with the astronomical growth currently being seen by this same group?", they cannot provide an answer. They have chosen to blindly push for a doomed management tool's implementation. They cannot show how it can be successful, since it will actually increase crowding by concentrating use on a shorter section of the river. Implementing Rest and Rotation, prior to gathering use data provided by a no-cost, no-limit Madison River Use Stamp on all non-commercial users, even temporarily, is purely a selfish act that benefits only one user group and punishes members of the public who choose to use the services of guides and outfitters on the Madison.

We strongly urge the Commission to deny implementation of Rest and Rotation, even as a temporary measure, at this time. The consequences of any sort of Rest and Rotation as a management tool would see irreparable fallout of anglers who choose use the services of guides and outfitters, and who contribute \$27 million annually to Madison County alone. FOAM is committed to look at other management tools that would truly provide tangible benefits to all users, but only after the use data is compiled. Please do not allow for implementation of Rest and Rotation offered with as a knee-jerk reaction to a complex problem.

We ask that you, as a guide or outfitter in Montana, email the Commission and FWP, urging them to reject Rest and Rotation on the Madison or any other rivers in our state to simply appease an organization that has not demonstrated how such a tool can provide a solution to a social crowding issue. We also urge you to ask your clients to do the same to help ensure that their enjoyment of Montana's angling opportunities remain into the future and are not threatened by poor management tools.