



**Fisheries Division Program and Guide**

**Comments Summary**

Overview

Public comment was requested for the proposed Statewide Fisheries Management Program and Guide. The draft Program and Guide was presented to the Fish and Wildlife Commission on December 10. The public comment period was initially December 13 – January 13. After several public requests, the comment period was extended to February 4, and was extended once again to February 15 to accommodate input from Federal partner agencies.

FWP received comments from 330 individuals, some of which represented organized fishing or hunting organizations or Federal land or wildlife management agencies. Organizations submitting comments include: Upper Missouri River Chapter of Walleyes Unlimited, US Fish and Wildlife Service, Montana Wildlife Federation, George Grant Chapter of Trout Unlimited, Pat Barnes Chapter of Trout Unlimited, Montana Trout Unlimited, Snowy Mountain Chapter of Trout Unlimited, Helena Hunters and Anglers, US Forest Service, and Flathead Valley Chapter of Trout Unlimited.

Comments covered a variety of resource and fisheries management topics, including comments on species specific and waterbody specific topics, fishing regulations, recreational concerns, AIS, habitat, among many others. The most commented upon individual topic was Walleye non-native/native status with 232 comments. Missouri River Walleye, which received 227 individual comments was second most popular. There were 322 waterbody specific comments, with the Missouri River (242 comments) receiving the most comments. Species specific comments were provided in 375 comments, with Walleye (312 comments) getting the most species-specific comments.

General Comments and FWP Response

Summarized below are excerpts from original comments or paraphrased comments and FWP’s response. 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 17 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 covered 17 general topics.

Topic	Number Comments
Species	375
Waterbody Specific	322
Walleye Status	232
Missouri River Walleye	227
Management Plans	25
Fish Management	22
Other	16
Fishing Regulations	10
AIS	8
Illegal Introductions	7
Recreation	6
Habitat	6
Climate Change	6
Water	5
Tournaments	3
Monitoring	3
Land Use	2
<b>Total</b>	<b>1,275</b>

**Species Specific Comments**

A total of 375 comments mentioned issues directly related to species management. Most comments (83%) pertained to walleye management; all walleye comments were related to the non-native status of walleye or management of walleye in the Missouri River below Holter Dam. Comments addressing these two walleye issues are summarized below. Outside of walleye, other species issues that were commented upon were related to bull trout (15 comments), brown trout (8), westslope cutthroat trout, among others.

Species	Comment	Response
Arctic Grayling	Fluvial grayling also occur in the Madison, Centennial, and Ruby. We recommend either deleting any reference to the Big Hole having the last remaining fluvial population or at least explain that we are aware of other fluvial fish in these other systems in the upper Missouri. This change would make this document consistent with the 2014 12-month finding for Arctic grayling and the Centennial CCAA with respect to how we discuss Arctic grayling in the upper Missouri River.	1)
Arctic Grayling	Page 181, Fisheries Management Section: We are unaware of substantiated evidence that Arctic Grayling have successfully been “re- established” in Elk Lake (i.e. as a naturally self-sustaining population). Despite several years of stocking, there has been only one anecdotal observation of an adult Arctic Grayling using Narrows Creek (the only spawning tributary); however, this report was never corroborated by surveys or with tangible evidence (e.g, photo, video, etc). Given the substantial amount of time and resources allocated to grayling restoration/conservation in the Centennial Valley, it is highly unlikely a significant spawning run of Arctic Grayling in Elk Lake would go undetected. Moreover, stocked Westslope Cutthroat Trout are regularly observed in Narrows Creek during the April/May spawning run. Therefore, it seems unlikely that a grayling spawning run that has not been observed has established a population in Elk Lake, whereas other trout which are routinely observed spawning in Narrows Creek are characterized as having limited natural reproduction. Finally, the lack of documented Arctic Grayling reproduction and recruitment in Elk Lake is further supported by recent decisions to establish a genetic reserve population of Red Rock Arctic Grayling in Handkerchief Lake. Thus, as written, the statement contradicts itself identifying limited natural reproduction potential in Elk Lake for some salmonids prefaced with grayling having been re-established. Thus, the paragraph quoted, as written is an inaccurate characterization of the Arctic Grayling population in Elk Lake. We recommend it be revised.	2)
Brown Trout	In reference to Table 1 on page 7... Brown Trout do not and have NEVER existed in the St. Mary drainage (ecoregion). The nearest Brown Trout population is found to the east in Duck Lake, which has no outlet and lies within the N.Fork Milk River basin (Blackfeet Reservation). Brown Trout have never been introduced to the St. Mary drainage.	3)

Species	Comment	Response
Brown Trout	Page 65, under Fisheries Management. Support the mandatory catch and kill regulation for brown trout between Kootenai Falls and Libby Dam.	
Brown Trout	Page 129, Rock Creek and tributaries. We strongly support liberal harvest regulations to reduce numbers of brown trout. We continued, and expanded efforts to evaluate effects of brown trout on bull trout. We support adaptive fisheries management to help tip the balance of fish production in favor of native fish over status quo non-native fish production. We recognize there are no silver bullets, and probably no win-wins for fisheries management (native and non) in such a large open system but we also would like to see adaptive efforts considered and pursued.	
Brown Trout	“With concern over the deleterious effects of brown and brook trout in the Bitterroot drainage, these fish should be managed similarly to pike: “more liberal harvest (no limits) and extended seasons.” Current harvest restriction on the Bitterroot appear to be aimed at maintaining brown trout, and are not very liberal considering the frequency that large browns are landed by anglers that harvest fish. By truly liberalizing take of brown trout it sends a social message as well as possibly having a biological effect. Again a tradeoff scenario that will short term fall out but may be critical to long term conservation of native fish populations.	4)
Brown Trout	Page 173, Fishtrap Creek. Why not identify liberal harvest limits for rainbow, brown, and brook trout? Especially with the brown trout population that it is in the Thompson River and what has been seen across western Montana for Brown trout expansion, it seems like this would be a good place to put this tool to work.	5)
Brown Trout	[...]much of the management direction for bull trout consists of continued yearlong closures, while for cutthroat much of the management direction includes enhancement of migratory and resident populations. Unlike many of the native cutthroat streams, no specific management strategies are identified for brook trout and brown trout in bull trout streams. While we recognize that many of the fish regulations and Management Direction are site specific, we recommend that a consistent set of approaches or options be applied across regions/habitats for the benefit of bull trout.	6)
Brown Trout	The Plan does not provide a cohesive management plan concerning brook trout and brown trout across bull trout habitats. For example, in the Swan River system, one may not keep brook trout in several of the bull trout local populations/tributaries. However, in the Rock Creek and Flint Creek bull trout core areas one may keep brook trout in any of the local populations. In addition, many of the	6)

Species	Comment	Response
	areas where a bull trout stream enters a larger river (i.e., Big Creek confluence with North Fork Flathead) are closed to angling while other important confluences are not. In the Kootenai River, suppression of brown trout is specifically mentioned but no specific target for brown trout suppression for Warm Spring Creek above Meyers Dam was addressed	
Brown Trout	Page 308, Fisheries Management Section Paragraph 1: The lower 19 miles of Cut Bank Creek does not contain Brown Trout. In fact, there are no Brown Trout in any stream on the Blackfeet Reservation. There is a marginal population of Rainbow Trout. Historical reports suggest this section was primarily a warmwater species assemblage (Sauger, Goldeye, River Carpsucker, Black Bullhead) prior to the State's 1954 Marias River Restoration project where 80,000 lbs. of "Fish-Tox" (Rotenone/Toxaphene) was applied throughout the drainage (Federal Aid report by Nels Thorsen, Montana project number F-15-D-2, 1956). This section of Cut Bank Creek currently contains many cool/warm water species, including Walleye, Burbot, Flathead Chub, Emerald Shiner, Mountain, White, and Longnose suckers, Brassy Minnow, Fathead Minnow, and Brook Stickleback. We disagree with the statement that this reach is primarily a coldwater species assemblage and recommend it be revised.	7)
Bull Trout	Page 19, under Drought-related Fishing Restrictions. "Daily maximum water temperatures that have reached or exceeded 73 F at any time during three consecutive days (60 F in the case of bull trout waters)." What constitutes bull trout waters?	8)
Bull Trout	Page 92 and 94, "Enhance migratory populations (bull trout) for conservation" in Lindberg and Swan. What does this entail? Especially in Swan where experimental netting to reduce lake trout is no longer being pursued by the state.	9)
Bull Trout	Page 106, Flathead Lake. "Provide angling harvest opportunity to reduce numbers to help meet native species goals. And Coordinate with CSKT on lake management." Flathead Lake is a cornerstone adfluvial population of Bull Trout Core area and critical to recovery in the Columbia Headwaters Recovery Unit. It would be nice to see more effort here to articulate what this mean moving forward, and if status quo or less than status quo on lake trout suppression what that might portend. Wait and see for this area does not seem appropriate for this water body and iconic bull trout population.	10)
Bull Trout	Page 114, Little Blackfoot River. eDNA work suggest some level of occupancy of bull trout in the system, though perhaps hybridized. Should acknowledge via stating that there is a year round closure. Conduct added work to figure out if this bull trout can be enhanced in this drainage.	11)

Species	Comment	Response
Bull Trout	Page 129, East Fork Rock Creek Reservoir and above and below. We support the FWPs continued efforts to improve reservoir operations for bull trout in partnership with the FWS, DNRC and FS on this important bull trout system. Also effort to look at downstream flow management for channel maintenance and potential increased bull trout production.	
Bull Trout	Page 129, Rock Creek and tributaries. We strongly support liberal harvest regulations to reduce numbers of brown trout. We continued, and expanded efforts to evaluate effects of brown trout on bull trout. We support adaptive fisheries management to help tip the balance of fish production in favor of native fish over status quo non-native fish production. We recognize there are no silver bullets, and probably no win-wins for fisheries management (native and non) in such a large open system but we also would like to see adaptive efforts considered and pursued.	
Bull Trout	Also, why is the West Fork of the Thompson River not called out as one of the most important tributaries for both bull and west slope trout production?	12)
Bull Trout	While considerable efforts have occurred to date in the name of bull trout, many of these efforts have focused on habitat improvement that have benefits across species. The Service looks forward to working with FWP to identify areas/populations to implement management actions that go beyond changes to fishing regulations. For example, suppression efforts in Flathead Lake, Swan Lake, and the efforts undertaken by the Confederated Salish and Kootenai Tribes (CSKT) and Glacier National Park have undoubtedly contributed to the maintenance and or increases of bull trout populations in those systems. In addition, the Service is encouraged by the management direction for the Warm Spring Creek population. More importantly, these actions have preserved future management options, not only for recovery but for other interests as well. For example, the loss of Swan Lake could have profound consequences to several existing and on-gong consultations, agreements, Habitat Conservation Plans, and habitat investments with the Forest Service, DNRC, NRCS, Corps, and BPA and could affect their programs.	13)
Bull Trout	[...]much of the management direction for bull trout consists of continued yearlong closures, while for cutthroat much of the management direction includes enhancement of migratory and resident populations. Unlike many of the native cutthroat streams, no specific management strategies are identified for brook trout and brown trout in bull trout streams. While we recognize that many of the fish regulations and Management Direction are site specific, we recommend that a consistent set of approaches or options be applied across regions/habitats for the benefit of bull trout.	6)
Bull Trout	For many of the non-native species known to either prey upon or directly compete with bull trout, FWP has largely identified the "Management Type" as General/ Suppression and the "Management	14)

Species	Comment	Response
	<p>Direction” as liberalized angling limits or harvest opportunity for those non-native species. The exception of this is within Swan Lake where the Management Direction was to evaluate tools to reduce lake trout abundance to benefit native and recreationally important species. The Service commends FWP for directly addressing the need for prescriptive action within the Swan drainage to manage the continued threat posed by lake trout. However, the Service is concerned that this type of prescriptive management direction is not identified for other waters where the threats to bull trout can be clearly identified, and a management action could be taken to begin to ameliorate those threats. Again, we recommend consistent set of management tools be identified and applied to benefit bull trout.</p>	
Bull Trout	<p>The Plan does not provide a cohesive management plan concerning brook trout and brown trout across bull trout habitats. For example, in the Swan River system, one may not keep brook trout in several of the bull trout local populations/tributaries. However, in the Rock Creek and Flint Creek bull trout core areas one may keep brook trout in any of the local populations. In addition, many of the areas where a bull trout stream enters a larger river (i.e., Big Creek confluence with North Fork Flathead) are closed to angling while other important confluences are not. In the Kootenai River, suppression of brown trout is specifically mentioned but no specific target for brown trout suppression for Warm Spring Creek above Meyers Dam was addressed</p>	6)
Bull Trout	<p>Page 468: We suggest providing a citation(s) for the statement that recent management efforts have shown that the presence of non-native trout does not necessarily mean that bull trout populations will decline.</p>	15)
Bull Trout	<p>Page 469, under Management Direction: The Service in Montana did not designate Critical Habitat under the ESA for any water bodies that were not considered occupied unlike other states within the range of bull trout. We relied almost entirely on FWP field biologist input and information from the MFISH database to identify areas that represented the best of the remaining populations. It should also be noted that not all occupied streams were designated. The Service remains optimistic that options for non-native management is a developing field and several management tools may become much more acceptable options. We recognize that several areas would require a much greater effort to establish sustainable populations and should receive lower priority for management at this point in time.</p>	
Bull Trout	<p>Page 38, under last full paragraph that addresses FWP’s role with FERC proceedings. Maybe a unique situation but the Flint Creek water project and DWR and FWP, FWS and FS have a vested interest in in flow and reservoir operations and conservation to that critical local bull trout population in EFK Rock Creek drainage, especially above the reservoir. Because the dam and some of the ditch are on the FS</p>	16)

Species	Comment	Response
	lands this requires FS Special Use Permits or “Ditchbill Easements” and ESA consultation for operations. You might want to highlight your role in these situations? Same for Painted Rocks and West Fork Bitterroot and negotiated flow operations.	
Eastern Brook Trout	Page 77, under Yaak River. Support for the liberal brook trout harvest and potential pursuit of other reduction or elimination efforts.	
Eastern Brook Trout	Page 148, “Maintain liberal harvest regulations to lessen competition and hybridization and help meet native trout goals.” We support this. But a broader question and something worth the plan exploring somewhere above. Can you provide examples of where this has led to a demonstrable change in fish community in favor of native fish populations, specifically for brook trout, but more generically for other species as well. So, examples of where it is or has been a viable tool and then where it has not worked and why and for what species?	17)
Eastern Brook Trout	Page 173, Fishtrap Creek. Why not identify liberal harvest limits for rainbow, brown, and brook trout? Especially with the brown trout population that it is in the Thompson River and what has been seen across western Montana for Brown trout expansion, it seems like this would be a good place to put this tool to work.	5)
Eastern Brook Trout	[...]much of the management direction for bull trout consists of continued yearlong closures, while for cutthroat much of the management direction includes enhancement of migratory and resident populations. Unlike many of the native cutthroat streams, no specific management strategies are identified for brook trout and brown trout in bull trout streams. While we recognize that many of the fish regulations and Management Direction are site specific, we recommend that a consistent set of approaches or options be applied across regions/habitats for the benefit of bull trout.	6)
Eastern Brook Trout	The Plan does not provide a cohesive management plan concerning brook trout and brown trout across bull trout habitats. For example, in the Swan River system, one may not keep brook trout in several of the bull trout local populations/tributaries. However, in the Rock Creek and Flint Creek bull trout core areas one may keep brook trout in any of the local populations. In addition, many of the areas where a bull trout stream enters a larger river (i.e., Big Creek confluence with North Fork Flathead) are closed to angling while other important confluences are not. In the Kootenai River, suppression of brown trout is specifically mentioned but no specific target for brown trout suppression for Warm Spring Creek above Meyers Dam was addressed	6)
Lake Trout	Page 106, Flathead Lake. “Provide angling harvest opportunity to reduce numbers to help meet native species goals. And Coordinate with CSKT on lake management.” Flathead Lake is a cornerstone	10)



Species	Comment	Response
	adfluvial population of Bull Trout Core area and critical to recovery in the Columbia Headwaters Recovery Unit. It would be nice to see more effort here to articulate what this mean moving forward, and if status quo or less than status quo on lake trout suppression what that might portend. Wait and see for this area does not seem appropriate for this water body and iconic bull trout population.	
Lake Trout	For many of the non-native species known to either prey upon or directly compete with bull trout, FWP has largely identified the “Management Type” as General/ Suppression and the “Management Direction” as liberalized angling limits or harvest opportunity for those non-native species. The exception of this is within Swan Lake where the Management Direction was to evaluate tools to reduce lake trout abundance to benefit native and recreationally important species. The Service commends FWP for directly addressing the need for prescriptive action within the Swan drainage to manage the continued threat posed by lake trout. However, the Service is concerned that this type of prescriptive management direction is not identified for other waters where the threats to bull trout can be clearly identified, and a management action could be taken to begin to ameliorate those threats. Again, we recommend consistent set of management tools be identified and applied to benefit bull trout.	14)
Mountain Whitefish	CHANGE: Reword Management Direction for Mountain Whitefish, page 242 REASON: ?Historically, mountain whitefish have not been monitored due to logistical constraints with sampling. However, anglers have reported catching reduced numbers of mountain whitefish in recent years.? The direction is undefined because you haven?t collected data to determine the population range of this native fish. Collect the data immediately and define it.	18)
Pallid Sturgeon	Page 381, first paragraph: We suggest updating references to pallid sturgeon recovery priority management areas made in this section (per the 1993 recovery plan), and elsewhere in the document as applicable, to the four pallid sturgeon management units defined in the 2014 revised recovery plan.	19)
Pallid Sturgeon	Page 468 and 479, under Pallid Sturgeon: We suggest providing a citation(s) for the statement: It is currently estimated that fewer than 100 wild adult pallid sturgeon persist in the upper Missouri and Yellowstone rivers above Lake Sakakawea.	20)
Pallid Sturgeon	Page 479: under Relevant Management Documents: We suggest updating this section by also including the following relevant management documents specific to Pallid Sturgeon: the Biological Opinion on Operation of the Missouri River Mainstem Reservoir System, the Operation and Maintenance of the Bank Stabilization and Navigation Project, the Operation of Kansas River Reservoir System, and the Implementation of the Missouri River Recovery Management Plan (USFWS 2018); the Pallid Sturgeon	21)

Species	Comment	Response
	Range-wide Stocking and Augmentation Plan (USFWS 2008); and, the Revised Recovery Plan for the Pallid Sturgeon ( <i>Scaphirhynchus albus</i> ) (USFWS 2014).	
Pallid Sturgeon	Page 381, Lower Missouri River Drainage: Special Management Issues section, 1st paragraph, 1st sentence: “The lower Missouri River is critical habitat for rearing pallid sturgeon of all life stages.” We understand that this area is valuable and important for pallid sturgeon, however caution should be used when using the term “critical habitat” as this has a very clear statutory meaning when used in conjunction with species listed under the ESA. The Service did not designate critical habitat for pallid sturgeon when the species was listed or anytime subsequent. We recommend changing “critical habitat” to something like “extremely important,” or “highly valuable,” or “essential,” or some similar descriptor to reduce any potential for confusion with this regulatory term.	22)
Pallid Sturgeon	Page 342, Fish Management Direction table, Milk River section: While pallid sturgeon would likely be included in the “Native non-game fishes” category. Given the federally threatened status, we recommend that they be listed separately and provided a “management direction” descriptor similar, as was done in the Missouri River-Poplar Drainage table on page 374.	23)
Prairie Fish	Montana’s non-game fish species, including prairie fish of the Eastern District, play important roles in their respective ecosystems. Thank you for recognizing their contribution to the biodiversity of the state’s aquatic habitats. Although funding is limited, there will continue to be a need to monitor these fish communities and increase our understanding of their ecology.	
Rainbow Trout	MISSOURI RIVER ? DEARBORN DRAINAGE CHANGE: Under ?Fisheries Management? page 242; The beginning of the 2nd paragraph should read, ?In fall 2017, rainbow trout in the Craig section were estimated at 4,936 per mile representing a 45% increase over the current long-term 36-year average of 3,394 per mile. This estimate represents a decline from the peak estimate in 2012 of 7,312 rainbows per mile, which at the time resulted in a 130% increase over the average of 3,036 per mile. The 2017 sampling event represents the seventh consecutive year of above average rainbow trout population estimates in the Craig section. Brown trout 10 inches or greater?? REASON: Rather than just mentioning the peak, define it. After all, it was the state of the fishery when the current plan for walleye suppression was proposed and implemented under the guise of protecting the wild trout. Not only does this do a better job of highlighting the absurdity of the suppression policy then but lends credibility for arguments against the proposed suppression plan now.	24)

Species	Comment	Response
Rainbow Trout	Page 95, Swan River and Tributaries (Swan Lake to Flathead Lake). "Eliminate harvest and enhance fluvial populations for conservation and WCT angling. Consider isolation of WCT populations if hybridization is a threat and habitat is sufficient to allow persistence." This is basically the status quo. However, we have concerns about eliminating WCT harvest on Swan tributaries. The tributaries have little angling pressure anyway no harvest may antagonize the angler any more than necessary. We like to tell people that we have conserve WCT and doing so will not remove any fishing opportunities. The report is confusing about what it recommends on Swan River proper (above the lake). "Manage trout (RBT) harvest to support recreational fishing and minimize impacts on native fish." This is at the expense of native fish. Standard harvest regulations for RBT would be appropriate. Montana FWP should completely halt stocking golden trout in Heart and Island Lakes. That is counter-productive and unneeded.	25)
Rainbow Trout	Page 173, Fishtrap Creek. Why not identify liberal harvest limits for rainbow, brown, and brook trout? Especially with the brown trout population that it is in the Thompson River and what has been seen across western Montana for Brown trout expansion, it seems like this would be a good place to put this tool to work.	5)
Smallmouth Bass	I wish Montana would do more to manage for non-native species. I LOVE fishing for smallmouth bass and walleye. I would like to see more done to expand their habitat in Montana. I am an angler living in Butte and I do 80% of my fishing up in the Noxon area because of the warm water species living there. Any place that can support these fish should be a high priority. Trout can live almost anywhere in Western MT, but only a few places have bass/walleye.	26)
Smallmouth Bass	Page 154: "However, no major colonization of the Clark Fork River [by smallmouth bass] upstream of the Flathead River confluence has been detected." FWP might do well to consult with area anglers. Smallmouth bass are being caught in good numbers in the Clark Fork upstream of the Flathead and threaten a popular wild trout fishery.	27)
Walleye	<b><u>There were 312 comments that mentioned walleye. All comments related to walleye pertained to the non-native status of walleye and/or walleye in the Missouri River. Response to walleye comments can be found in the Walleye Status and Missouri River Walleye sections.</u></b>	
Walleye/Sauger Hybridization	Page 14. "Challenges associated with nonnative species are widespread, and include significant concerns like hybridization between introduced walleye and native sauger" Later in the document it states: "A recent FWP study of sauger populations from 21 sites in the Missouri and Yellowstone drainages found low levels of hybridization (2%)". This seems to contradict each other.....	28)

Species	Comment	Response
Westslope Cutthroat Trout	Page 95, Swan River and Tributaries (Swan Lake to Flathead Lake). “Eliminate harvest and enhance fluvial populations for conservation and WCT angling. Consider isolation of WCT populations if hybridization is a threat and habitat is sufficient to allow persistence.” This is basically the status quo. However, we have concerns about eliminating WCT harvest on Swan tributaries. The tributaries have little angling pressure anyway no harvest may antagonize the angler any more than necessary. We like to tell people that we have conserve WCT and doing so will not remove any fishing opportunities. The report is confusing about what it recommends on Swan River proper (above the lake). “Manage trout (RBT) harvest to support recreational fishing and minimize impacts on native fish.” This is at the expense of native fish. Standard harvest regulations for RBT would be appropriate. Montana FWP should completely halt stocking golden trout in Heart and Island Lakes. That is counter-productive and unneeded.	25)
Westslope Cutthroat Trout	Page 103, Flathead River. We support “Eliminate harvest and maintain or expand populations for conservation and catch and release westslope cutthroat angling. Consider isolation of westslope cutthroat populations if hybridization is a threat and habitat is sufficient to allow persistence. And, “Provide angling harvest opportunity to reduce numbers to help meet native species goals. Investigate removal of rainbow-cutthroat trout hybrids and rainbow trout to reduce future hybridization.”	
Westslope Cutthroat Trout	Page 145, Bitterroot River Drainage. It is nice to see the area above Painted Rocks Reservoir identified as a genetic stronghold for pure WCT. We support and implement efforts to expand these populations and believe that the enhancement of adfluvial bull trout in and above the Reservoir should be emphasized as well.	
Westslope Cutthroat Trout	Also, why is the West Fork of the Thompson River not called out as one of the most important tributaries for both bull and west slope trout production?	12)
Westslope Cutthroat Trout	With regard to native species management, I strongly support the Westslope and Yellowstone Cutthroat Trout Conservation Programs. I am encouraged to see the Fisheries Division establish long-term goals to have approximately 20% of the historically-occupied habitat in major drainages restored to secure conservation populations of these native trout. The SMPG objectives for re-building metapopulations and maintaining diverse life histories of native cutthroats (resident, fluvial and adfluvial) in order to boost species resiliency across landscapes are further evidence of good science-based policies. Montana’s cutthroat trout are an irreplaceable part of our natural heritage and deserve this special conservation emphasis in the SMPG.	
Westslope Cutthroat Trout	Conserving and restoring westslope cutthroat trout populations in the upper Missouri River Basin where the species is most imperiled will require a focused, continuous effort. Considerable progress	

Species	Comment	Response
	has been made toward this goal -- much has been learned about preserving the genetic integrity of these unique native trout populations and reducing threats from introduced rainbow and eastern brook trout. I encourage the Fisheries Division to expand these efforts and to maintain the restoration projects that have been accomplished to date.	
Westslope Cutthroat Trout	The Service has reviewed the Management Direction for Yellowstone and Westslope Cutthroat trout and supports FWP's active management approaches to conserving those native fish. The Service recognizes the non- native species management is difficult, and that FWP has made great strides in this arena concerning native cutthroat trout.	
Yellow Perch	I would like to see more spearing opportunities for pike. The lower Clark fork and flathead would benefit from pike reduction I would think. Also some spearing for Perch. It seems like they are non native and the general idea is to lower their populations.	29)
Yellow Perch	Hello, please consider increasing opportunities to spearfish pike in more locations as well as other non native species especially yellow perch and bass. Spearfishing can provide recreation and concurrent non-native species management. This is becoming more common in Hawaii and other places. Wherever your guide suggests reducing populations please open up spearing options. We have a very good look at what we catch and abide by the same limits as others. We often operate with size restrictions without issue.	29)
Yellow Perch	I have two concerns with our fisheries the perch limit being 50 a day at holter and no limit on walleye below holter to cascade bridge. The perch population has got to be dwindling down at holter every ice season person after person takes limits home. As for no limit on walleye there shouldn't be a limit on trout either. If we are worried about native versus non native fish then let's get the burbot and mountain Whitefish numbers up. This simple according to your thought on no limit on walleye below holter and no limit on northern pike in the upper Missouri river system.	30)
Yellow Perch	Perch numbers in holter increased dramatically, resulting higher limits, to reduce numbers. When numbers declined rapidly, 3 year average in current management plan stated no action needed, perch levels will not rebound if FWP waits for 3 year average. This is not appropriate action to maintain a quality fisheries for perch.	30)
Yellowstone Cutthroat Trout	With regard to native species management, I strongly support the Westslope and Yellowstone Cutthroat Trout Conservation Programs. I am encouraged to see the Fisheries Division establish long-term goals to have approximately 20% of the historically-occupied habitat in major drainages restored to secure conservation populations of these native trout. The SMPG objectives for re-building metapopulations and maintaining diverse life histories of native cutthroats (resident, fluvial and	

Species	Comment	Response
	adfluvial) in order to boost species resiliency across landscapes are further evidence of good science-based policies. Montana's cutthroat trout are an irreplaceable part of our natural heritage and deserve this special conservation emphasis in the SMPG.	
Yellowstone Cutthroat Trout	The Service has reviewed the Management Direction for Yellowstone and Westslope Cutthroat trout and supports FWP's active management approaches to conserving those native fish. The Service recognizes the non- native species management is difficult, and that FWP has made great strides in this arena concerning native cutthroat trout.	

### FWP Response to Species Specific Comments

Response Number	Response
1)	FWP will update language in the final Program and Guide to maintain consistency with the 2014 Centennial CCAA.
2)	Arctic grayling were successfully re-established in Elk Lake; fry were stocked via RSI from 2010 to 2013 and juvenile and/or adult grayling were sampled every year from 2012 to 2018, except 2016. We have not documented successful recruitment of naturally produced grayling, let alone at rates that would lead us to consider the re-established population to be self-sustaining. This section has been updated in the Program and Guide to better outline the current Elk Lake Arctic grayling status.
3)	The only brown trout found in the St. Mary drainage are present in Duck Lake, which falls in the St. Mary 4th level HUC.
4)	Limits for brown trout were liberalized in the East and West Forks of the Bitterroot, otherwise there has been public resistance to liberalizing brown trout harvest. Brown trout limits have been liberalized in other areas (such as Rock Creek) but have seen no increase in harvest due to high rates of catch and release fishing. This severely diminishes the effectiveness of using angler bag limits to influence fish populations.
5)	Fishing pressure is low in Fishtrap Creek, with low levels of angler harvest. Anglers are allowed to keep three brown trout per day which is a relatively liberal limit considering the low densities of brown trout. Calling attention to the stream with exaggerated limits could increase angling pressure which increases risk of incidental catch of bull trout. We are proposing to allow year-round harvest of brown trout in the mainstem Thompson River beginning next year. Brook trout fall under the general rule of 20 fish per day.

Response Number	Response
6)	Although similar strategies may be implemented for brown trout and brook trout in bull trout streams, FWP preference is to evaluate strategies on a case by case basis rather than implementing a multipurpose management strategy that might not be appropriate in some streams. For example, a popular non-native sport fishery may fall within a bull trout stream, but current abundance of bull trout may be at levels too low to justify suppressing the sport fishery.
7)	Based on the species distribution from the Montana Natural Heritage Program, brown trout are present in lower Cut Bank Creek. There are no recent FWP surveys on record to determine presence or absence of brown trout. Based on the Montana Natural Heritage Program, species present in Cut Bank Creek are brown trout, burbot, emerald shiner, fathead minnow, flathead chub, longnose dace, longnose sucker, mottled sculpin, mountain sucker, mountain whitefish, rainbow trout, and white sucker. FWP agrees that this is a mixed coolwater and warmwater species assemblage.
8)	Bull trout waters refers to tributaries of larger rivers, lakes and reservoirs that support bull trout spawning and juvenile rearing habitats.
9)	Enhance migratory populations is intended to improve fish passage and barriers that inhibit bull trout migration and pursue habitat improvements to link fragmented habitats. FWP will continue to monitor the lake trout and bull trout populations, and if alternatives that would increase lake trout mortality while decreasing bull trout bycatch are developed, they may be used at that time. In the case of Lindbergh Lake, a previous telemetry study was conducted to identify potential lake trout spawning locations. Lindbergh Lake contains a relatively small bull trout population, and gill net suppression may not be feasible because of bull trout bycatch concerns. However, if innovative techniques being tested in Yellowstone Lake prove worthwhile, the knowledge gained from past telemetry studies could be used in Lindbergh Lake.
10)	FWP is committed to managing the Flathead Lake system in ways that maintain a viable bull trout population. Liberal harvest limits for lake trout in Flathead Lake and land management efforts that maintain and improve conditions in bull trout spawning tributaries are important parts of managing the system for both recreation and native species conservation. Bull trout numbers have been relatively stable in the Flathead system for nearly two decades, and the population is not in imminent risk of disappearing. Along with our resource partners, FWP would like to see more bull trout in the Flathead system, and we will continue to evaluate and consider feasible and sustainable measure that may help in those goals.

Response Number	Response
11)	Over the last 10+ years electrofishing surveys throughout the Little Blackfoot River have not resulted in captures of any pure bull trout. While this information would indicate a viable population does not currently exist in the Little Blackfoot River, the potential eDNA detection and captures of a couple phenotypic hybrid bull trout indicates additional surveys are warranted. Though eDNA is a not a fail-proof science and sample technique, FWP has and will use this recent information to focus additional electrofishing surveys. If it is determined that bull trout are established in the drainage, additional consideration will be given to their management needs in the drainage.
12)	The West Fork Thompson is indeed one of the most important tributaries for native trout in the lower Clark Fork River, including bull and westslope cutthroat. Owing to its importance towards native species conservation, FWP and partners invest relatively high amount of effort in both research and practical fisheries management efforts in the WF Thompson system. These include monitoring of bull trout spawning and outmigration, transferring bull trout over dams to allow them to re-enter their natal spawning tributaries, and surveys to determine the presence of genetically pure westslope. Finally, there is a “artificial lures only” restriction in the WF Thompson system that is intended to help reduce potential capture of bull trout.
13)	There is no debate that non-native species have had and will continue to have significant impact on bull trout populations in some areas. Lake trout predation is a prime example of these concerns in Swan and Flathead lakes. In other areas, a potential negative relationship between non-native species and bull trout declines are not directly apparent, and concerns are more attributable to short and long-term habitat changes that do not favor bull trout. For example, recent research indicates that reduced presence of bull trout in some steams is more likely the result of longer-term warming stream temperatures, and not directly the result of increasing brown trout. FWP has and will continue to work with all of our resource partners to consider and evaluate means to reduce the impacts of non-native species on bull trout. Research in Swan Lake with lake trout and brown expansion in tributaries are examples of this cooperation. We believe that additional such evaluations, and potentially longer management programs, should be evaluated through a public environmental assessment process and designed to allow a determination on whether the expended resources are providing a direct benefit to bull trout.
14)	Per prior discussion (see response 13), there is no debate that non-native species have had significant impacts on bull trout in some areas. In other areas, bull trout declines are also, or primarily, related to short and long-term habitat changes. Techniques and resources do not exist to address potential non-native threats to bull trout throughout their distribution in Montana. However, as presented in response 13, FWP will continue to work with partners to evaluate non-native species management tools, and potentially apply these to certain waters if the project has been evaluated through a public environmental assessment process and designed to allow a determination on whether the expended resources are providing a direct benefit to bull trout.



Response Number	Response
15)	While there are locations where the presence of non-native species is not an inherent threat to bull trout, the statement referenced will be clarified to reflect that the current status of individual bull trout populations is a reflection of a multitude of variables including short and long term habitat changes and the presence of non-native species in some locations.
16)	FWP will continue to work with DNRC, USFS, and other state and federal partners as well as federally licensed and non-licensed dams to mitigate impacts from dam operations to bull trout and other species.
17)	Liberalized limits provide a means to potentially reduce the threats of non-native species like brown and brook trout, but we do not have direct evidence or “demonstratable” positive changes to a native species status through such regulations for these species. Though unverified, the concepts of liberalized limits, as referenced for the WF and WF Bitterroot, are simply to reduce the occurrence of a non-native species which may prey-on and compete or hybridize with a native species, thereby potentially improving native species status in some areas.
18)	Discussion on page 242 defines ranges of population estimates for rainbow trout and brown trout in the Missouri River in the Craig section, and clarifies that mountain whitefish have not been monitored but anecdotal reports and observations indicate that abundance has declined. FWP will collect additional data and identify limiting factors for mountain whitefish as workload allows.
19)	FWP will update references to pallid sturgeon recovery management areas throughout the document. Changes were made to relevant sections as well as to the species profile. Relevant management documents were updated and references to the most-current recovery plan with its associated and updated management unit designations were included.
20)	Citations used for current population estimate are included within the Pallid Sturgeon-specific relevant management documents (e.g., Jaeger et al. 2009 in USFWS 2014; Rotella and Hadley, 2009; Rotella, 2010, 2012, 2015, 2017).
21)	Relevant management documents were updated and references to the most-current recovery plan with its associated and updated management unit designations were included.
22)	FWP will update language in the final Program and Guide to reduce confusion with the regulatory term of "critical habitat." Connotation noted and "critical habitat" was replaced with "provides essential habitat".
23)	For the lower Milk River drainage, Pallid Sturgeon were included in the management direction table similar to what was included for the Missouri River-Poplar drainage section.

Response Number	Response
24)	The intent of the discussion in this section is to define the ranges of population estimates for rainbow trout and brown trout in Missouri River sampling sections. FWP believes that the population ranges are adequately defined as written.
25)	The Swan River upstream of Swan Lake has historically been managed as a recreational rainbow trout fishery. In recent times, there has been a growing interest in trying to restore migratory westslope cutthroat trout populations in the Swan. It may be possible to make regulation changes to allow for some harvest of rainbow trout in the upper Swan River. The idea of changing to the Western District standard would allow for rainbow trout harvest and would simplify the regulation booklet. A side benefit to this regulation change would be additional communication to the public about the conservation value of westslope cutthroat trout in the Swan drainage. With regard to Heart and Island Lakes, these lakes are two of only a few opportunities in the state to catch golden trout. They are stocked very infrequently and at a very low density. While there is some risk of downstream dispersal, both lakes drain to Crescent Lake, which is managed as a put-grow-and take westslope cutthroat fishery. Additionally, the downstream tributaries contain mostly brook trout and rainbow trout, and golden trout represent minimal risk to those fisheries.
26)	FWP will continue to identify opportunities to manage for non-native species, including smallmouth bass, where appropriate. Factors that are considered before any species is introduced to a waterbody include impacts to the existing fishery, impact to native species, and impacts to adjacent waterbodies.
27)	This statement was carried over from the 2013 document. FWP consistently receives reports and observations of smallmouth bass upstream of the Flathead River mouth. These movements appear to be seasonal with no established population in this Clark Fork reach. This information will be updated in the Program and Guide.
28)	Hybridization between walleye and sauger can present problems within some areas of their range and are monitored to detect degree of hybridization. As noted, there is a low degree of hybridization from 21 drainages in the Missouri and Yellowstone. Even a low degree of hybridization can negatively impact fish populations and jeopardize the long-term genetic viability of a population.
29)	FWP is going to consider additional spearing opportunities for Northern Pike during the 2020 regulation setting process. Spearing for other species such as Yellow Perch or bass are currently not proposed.
30)	Yellow perch management goals and strategies are outlined in the Upper Missouri River Reservoir Fisheries Management Plan. That plan is currently under revision.

**Waterbody Specific Comments**

A total of 322 comments pertained to issues dealing with specific waterbodies. Of those, 75% pertained to comments related to walleye in the Missouri River below Holter Dam. Missouri River walleye comments are addressed in a separate section below. Other waterbodies that received a number of comments were also walleye waters, including Lake Frances (13 comments), Tiber Reservoir (11 comments), and Fresno Reservoir (6 comments).

Waterbody	Comment	Response
Bighorn River	Page 406 Bighorn River-Downstream of Yellowtail Reservoir, management direction for brown trout and rainbow trout. I do not support the current management direction or the proposed management direction on the Bighorn River. The upper river is full of trout, but I don't believe there is much in the way of diversity when it comes to size structure. I believe one (of many) reasons for this is the number of outfitters working this river. The vast majority of them are opposed to harvesting ANY trout. Basic biology states that a river system can only support so many pounds of fish per a certain distance. This is because of the typical food supply. More mouths to feed means smaller average size fish. Less mouths to feed means larger average size fish. Outfitted clients might be happy catching a boat load of 14" to 16" trout but this river could produce better quality fish and, in fact, has in the past under regulations other than artificial lures only. I would like to see FWP make an effort to educate fishermen and outfitters alike on the benefits to this river system (as well as other river systems) that increased harvest and elimination of an artificial lures only regulation would provide.	1)
Bitterroot River	"With concern over the deleterious effects of brown and brook trout in the Bitterroot drainage, these fish should be managed similarly to pike: "more liberal harvest (no limits) and extended seasons." Current harvest restriction on the Bitterroot appear to be aimed at maintaining brown trout, and are not very liberal considering the frequency that large browns are landed by anglers that harvest fish. By truly liberalizing take of brown trout it sends a social message as well as possibly having a biological effect. Again a tradeoff scenario that will short term fall out but may be critical to long term conservation of native fish populations.	2)
Blackfoot River	Page 133, Blackfoot River Drainage. "The Blackfoot River is managed as a wild trout fishery, emphasizing natural reproduction of free-ranging and naturalized nonnative trout. The basin is also a focus for native trout recovery efforts." This needs more discussion of compatibility be managing for naturalized non-natives and native recovery efforts. Are there places to emphasize native fish to the detriment of non-native wild through harvest and other management options?	3)
Boulder River	Page 392-393 Restrictive regulations on the Boulder River and Tributaries and Stillwater River and Tributaries for rainbow trout and brown trout. I am totally against restrictive regulations on these rivers for rainbow trout and brown trout. According to the definition on page 59, restrictive	4)

Waterbody	Comment	Response
	regulations are put in place to restrict harvest to meet conservation goals for and to protect native species, or to maintain or alter the size structure of a fish population to meet angler demands. First of all, rainbow trout and brown trout in these rivers are not native species in need of protection. Second, there is not a biological need to maintain or alter the size structure of these populations to meet angler demands. The reason for the restrictive regulation is purely political. When is FWP going to start managing fisheries based ONLY on biology, and not on political correctness (don't you dare kill a precious trout)?	
Clark Fork River	Page 154: "However, no major colonization of the Clark Fork River [by smallmouth bass] upstream of the Flathead River confluence has been detected." FWP might do well to consult with area anglers. Smallmouth bass are being caught in good numbers in the Clark Fork upstream of the Flathead and threaten a popular wild trout fishery.	5)
Cut Bank Creek	Page 308, Fisheries Management Section Paragraph 1: The lower 19 miles of Cut Bank Creek does not contain Brown Trout. In fact, there are no Brown Trout in any stream on the Blackfeet Reservation. There is a marginal population of Rainbow Trout. Historical reports suggest this section was primarily a warmwater species assemblage (Sauger, Goldeye, River Carpsucker, Black Bullhead) prior to the State's 1954 Marias River Restoration project where 80,000 lbs. of "Fish-Tox" (Rotenone/Toxaphene) was applied throughout the drainage (Federal Aid report by Nels Thorsen, Montana project number F-15-D-2, 1956). This section of Cut Bank Creek currently contains many cool/warm water species, including Walleye, Burbot, Flathead Chub, Emerald Shiner, Mountain, White, and Longnose suckers, Brassy Minnow, Fathead Minnow, and Brook Stickleback. We disagree with the statement that this reach is primarily a coldwater species assemblage and recommend it be revised.	6)
Dearborn River	I fish the Dearborn which is a tributary of the Missouri below Holter Dam. This is a premier trout fishery. I would hate to see it ruined by allowing walleyes below Holter that would impact the trout in the Dearborn. There are plenty of walleyes in Canyon Ferry, Hauser and Holter already. Don't ruin any more trout waters by allowing the introduction of walleyes.	7)
Fishtrap Creek	Page 173, Fishtrap Creek. Why not identify liberal harvest limits for rainbow, brown, and brook trout? Especially with the brown trout population that it is in the Thompson River and what has been seen across western Montana for Brown trout expansion, it seems like this would be a good place to put this tool to work.	8)
Flathead Lake	Page 106, Flathead Lake. "Provide angling harvest opportunity to reduce numbers to help meet native species goals. And Coordinate with CSKT on lake management." Flathead Lake is a cornerstone adfluvial population of Bull Trout Core area and critical to recovery in the Columbia Headwaters	9)

Waterbody	Comment	Response
	Recovery Unit. It would be nice to see more effort here to articulate what this mean moving forward, and if status quo or less than status quo on lake trout suppression what that might portend. Wait and see for this area does not seem appropriate for this water body and iconic bull trout population.	
Flathead Lake	Page 469, includes a reference to the Flathead Lake and River Co-Management Plan. We recommend that FWP update this plan.	10)
Flathead Lake	There are several mentions in the document of the Flathead Lake and River Fisheries Co-Management Plan as a guiding document. This agreement expired in 2010 and although the Department says that they “continue to cooperate on lake management”, there are fundamental disagreements in lake management that have resulted in different management actions and rules between the north and south half of the lake. It’s hardly a real agreement if both sides can pick and choose which parts of the document they will honor. If the Department wants to continue to tout the use of a bilateral agreement, the two sides should sit down and come to a mutual agreement on “a plan with goals and objectives agreed to by both parties” and manage the entire lake as a single habitat for the benefit of the fishery and anglers.	10)
Flathead Lake	The continued management of Flathead Lake for the benefit of a trophy lake trout fishery while trying to recover native species are largely conflicting management goals, and have resulted in the depression of bull trout numbers since the last Fishery Management Plan. It is concerning that the management of lake trout within Flathead Lake continues to be a controversial subject, and that the CSKT and FWP have not renewed the Flathead Lake and Rivers Fisheries Co- Management Plan since the expiration in 2010. Currently the management direction and regulations specified by the CSKT and FWP are largely conflicting, rendering neither adequate to fully reach their goals. It is the Services hope that Flathead Lake can be co-managed by the CSKT and FWP to benefit native species and to ameliorate the threat posed by non-native lake trout and other invasive species.	10)
Flathead River	Page 103, Flathead River. We support “Eliminate harvest and maintain or expand populations for conservation and catch and release westslope cutthroat angling. Consider isolation of westslope cutthroat populations if hybridization is a threat and habitat is sufficient to allow persistence. And, “Provide angling harvest opportunity to reduce numbers to help meet native species goals. Investigate removal of rainbow-cutthroat trout hybrids and rainbow trout to reduce future hybridization.”	
Fresno Reservoir	In the State Wide Fisheries Management Program Guid Part 1 Introduction and purpose it states " the FWP Fisheries Division preservers maintains and enhances aquatic species and their ecosystems TO MEET THE PUBLIC DEMAND FOR RECREATIONAL OPPORTUNITES AND STEWARDSHIP OF AQUATIC	11)

Waterbody	Comment	Response
	<p>WILDLIFE." I fail to see where this was accomplished in the last 10 years in Central and Western MT in regards to our request for better Walleye fishing. We have seen what stocking of walleye can do for a body of water in Fresno Reservoir. We have seen what the lack of and reduction has done to Lake Francis Reservoir. Walleye Fisherman have begged for Stocking of Walleye in Tiber Reservoir only to be refused by FWP. Walleye fisherman do not just fish walleye for the enjoyment of fishing but walleye is one of the best eating fresh water fish in North America. Please enhance our walleye fishing opportunities as your Fishery Management Plan States that you will. I am Joe Public and this is what I would like to see happen.</p>	
Fresno Reservoir	<p>Maybe all of these systems need additional direction as follows: Manage for walleye abundances based on the carrying capacity that sustains normal growth rates and condition factors of 85-100 with a diverse population age structure. Supplemental stocking will be considered to sustain relative abundance when there has been poor spawning conditions or success. Hatchery walleye stocking will be evaluated based on forage abundance, reservoir water levels, growth, relative weight and reservoir-wide relative abundance. Implement periodic creel surveys as funding allows.</p>	12)
Fresno Reservoir	#7 NEED A BETTER MANAGAMENT PLAN FOR FRESNO LAKE	
Fresno Reservoir	<p>Page 320 Look at all the data provided for Fresno to the public in this document. Awesome job!! Maybe Francis and Tiber manager should look at this section...</p>	
Fresno Reservoir	<p>FWP needs to make the Walleye Native to Montana based off of newer scientific evidence then what they are basing them not being native to. They need to contact American Fisheries Society and talk to the scientists that proved Walleyes are Native to Montana and stop fighting so hard against the walleye. Everything FWP does with about walleye in bias and negative that needs to change. The no limits on walleye below holter dam on the river needs to change. The no possession limit on walleye below holter dam needs to change to a reasonable amount 5 walleye. Tiber Fresno and Francis need to be managed better the numbers of walleyes per net there are down. 3 year running average on walleye in the gill nets and other fish needs to change. FWP needs to look into the mirror and really think about what they are doing because whats happening in western Montana with Walleyes is gross criminal bias and prejudice toward another species and should be against the law and the fisheries division management and biologist should be held accountable and should lose there jobs.</p>	11)
Gallatin River	<p>Page 225 Gallatin River and Tributaries-YNP to Sheds Bridge FAS. I strongly support the rainbow trout and brown trout management direction to maintain present numbers and sizes. I also strongly support increasing angler harvest to reduce numbers if necessary to maintain fish growth. Again, FWP</p>	

Waterbody	Comment	Response
	will have a hard sell to increase the harvest due to the “trout are too valuable to catch only once” mentality. It is my wish FWP will do what is correct biologically for this river.	
Graves Creek	Page 174, Graves Creek. Why are liberal harvest limits for non-native trout not recommended here?	13)
Holter Lake	I believe the native walleye should get more support in the Missouri River system especially in holter lake and river below the dam. Too much focus is on trout. We should be working to create fisheries that support both fish.	14)
Holter Lake	I have two concerns with our fisheries the perch limit being 50 a day at holter and no limit on walleye below holter to cascade bridge. The perch population has got to be dwindling down at holter every ice season person after person takes limits home. As for no limit on walleye there shouldn't be a limit on trout either. If we are worried about native versus non native fish then let's get the burbot and mountain Whitefish numbers up. This simple according to your thought on no limit on walleye below holter and no limit on northern pike in the upper Missouri river system.	14)
Holter Lake	Perch numbers in holter increased dramatically, resulting higher limits, to reduce numbers. When numbers declined rapidly, 3 year average in current management plan stated no action needed, perch levels will not rebound if FWP waits for 3 year average. This is not appropriate action to maintain a quality fisheries for perch.	14)
Jefferson River	Page 214 Jefferson River and Tributaries (Twin Bridges to Cardwell and Cardwell to confluence with Madison River). I would like to see the regulations set to the standard central fishing district trout limits once the population rebounds with increased water flow and lower river temperatures.	15)
Kootenai River	Page 65, under Fisheries Management. Support the mandatory catch and kill regulation for brown trout between Kootenai Falls and Libby Dam.	
Lake Frances	Lake Frances Statewide Plan strategies from page 315: Manage for a consumptive harvest based on biology of the fishery. Continue to evaluate the contribution of biannual walleye plants and adjust if necessary to maintain a balance with the forage base.	16)
Lake Frances	Maybe all of these systems need additional direction as follows: Manage for walleye abundances based on the carrying capacity that sustains normal growth rates and condition factors of 85-100 with a diverse population age structure. Supplemental stocking will be considered to sustain relative abundance when there has been poor spawning conditions or success. Hatchery walleye stocking will be evaluated based on forage abundance, reservoir water levels, growth, relative weight and reservoir-wide relative abundance. Implement periodic creel surveys as funding allows.	17)
Lake Frances	For Lake Frances?.remove language that would limit stocking to biannual as it is currently written.	16), 18)

Waterbody	Comment	Response
Lake Frances	#5 NEED A BETTER MANAGEMENT PLAN FOR LAKE FRANSCIC	
Lake Frances	The Divison should amend the Draft to include an evaluation component for supplemental stocking during poor spawning conditions in Tiber Reservoir and Lake Francis.	16), 18)
Lake Frances	In the State Wide Fisheries Management Program Guid Part 1 Introduction and purpose it states " the FWP Fisheries Division preservers maintains and enhances aquatic species and their ecosystems TO MEET THE PUBLIC DEMAND FOR RECREATIONAL OPPORTUNITES AND STEWARDSHIP OF AQUATIC WILDLIFE." I fail to see where this was acomplished in the last 10 years in Central and Western MT in regards to our request for better Walleye fishing. We have seen what stocking of walleye can do for a body of water in Fresno Reservoir. We have seen what the lack of and reduction has done to Lake Francis Reservoir. Walleye Fisherman have begged for Stocking of Walleye in Tiber Reservoir only to be refused by FWP. Walleye fisherman do not just fish walleye for the enjoyment of fishing but walleye is one of the best eating fresh water fish in North America. Please enhance our walleye fishing opportunities as your Fishery Management Plan States that you will. I am Joe Public and this is what I would like to see happen.	18), 40)
Lake Frances	(2) Page 315. Lake Francis. Language limiting to "biannual" stocking of walleye should be removed. Supplemental stocking should be considered and done as needed.	16), 18)
Lake Frances	Lake Frances was over fished in walleye to the point it lowered the numbers well below standards to sustain a quality fisheries. It may have been necessary to lower limits to 3 until numbers improve. Protect the quality breeders in the process and reestablish walleye stocking. Stocking walleye seems to be working for Fresno.	18)
Lake Frances	The language that Lake Francis being stocked biannually needs to be change to annually. This is obvious due to the fishing conditions currently at Lake Francis.	16), 18)
Lake Frances	Page 314. Tiber and Francis.....NO data listed, no net data, nothing. Our biggest reservoirs in R4 and they are not managed at all for quality fisheries. Nothing changes, just let it ride is the management choice. FWP management goal: Manage for a consumptive harvest with an opportunity for a trophy fish. Manage based on the biology of the fishery. Emphasize natural recruitment. HOW ARE YOUR DOING THIS??	16), 18), 40)
Lake Frances	FWP needs to make the Walleye Native to Montana based off of newer scientific evidence then what they are basing them not being native to. They need to contact American Fisheries Society and talk to the scientists that proved Walleyes are Native to Montana and stop fighting so hard against the walleye. Everything FWP does with about walleye in bias and negative that needs to change. The no	18)



Waterbody	Comment	Response
	<p>limits on walleye below holter dam on the river needs to change. The no possession limit on walleye below holter dam needs to change to a reasonable amount 5 walleye. Tiber Fresno and Francis need to be managed better the numbers of walleyes per net there are down. 3 year running average on walleye in the gill nets and other fish needs to change. FWP needs to look into the mirror and really think about what they are doing because whats happening in western Montana with Walleyes is gross criminal bias and prejudice toward another species and should be against the law and the fisheries division management and biologist should be held accountable and should lose there jobs.</p>	
Libby Creek	<p>Page 75, under Fisheries Management Drainage for Kootenai River Drainage table, Libby Creek and Tributaries (Headwaters to Kootenai River): “Where feasible, protect non-introgressed populations and restore genetic integrity to introgressed populations; Where practical, maintain current angling opportunity and harvest level. Where feasible reduce/eliminate hybridized populations to meet native species goals; Where practical, maintain liberal harvest opportunities. Where feasible reduce/eliminate competing populations to meet native species goals.” is management direction text for westslope, rainbow and brook trout, respectively.” This are great aspirations but lack any specificity and this is the theme throughout in most cases. FWP may not know where these actions are practical or feasible in many situations, but that are places that though monitoring and management emphasis and partnership desires that you have a good idea where these actions have been tired are should be prioritized for attempt. We would like to see some of these adaptive approaches identified more specifically throughout the various drainage discussions.</p>	19)
Little Blackfoot River	<p>Page 114, Little Blackfoot River. eDNA work suggest some level of occupancy of bull trout in the system, though perhaps hybridized. Should acknowledge via stating that there is a year round closure. Conduct added work to figure out if this bull trout can be enhanced in this drainage.</p>	20)
Madison River	<p>Page 219 Madison River and Tributaries-Yellowstone National Park to Elk Creek: I strongly support the rainbow trout and brown trout management direction to simplify the regulations and allow for harvest opportunities while maintaining fish numbers and sizes. The upper river should be open to the standard catch limits. Trout population monitoring isn’t showing an issue with numbers or condition of fish but FWP insists on managing this fishery socially. The problem I have with this is that for so many years, FWP has given in to the outfitting community and their “don’t kill a trout” mentality. Now, to try to get a sensible harvest of trout in this portion of this river is going to be extremely difficult. Harvesting fish in the upper Madison is supported biologically and would be healthy for the fishery but FWP has allowed outfitters to believe they alone should be allowed to socially manage the river. What</p>	21)

Waterbody	Comment	Response
	it looks like to most of us is that the outfitting community is the managing agency instead of FWP. Good luck changing that perception	
Madison River	In the central fishing district, there are the standard trout limits and then there are various exceptions. I am adamantly opposed to these various exceptions. The trout limit should be the standard limit of 5 trout, only 1 over 18" throughout the district. The only time an exception should be made is when there is a proven, biological reason for a lower limit. Notice I did not say social or political, I said biological. This would accomplish a couple things. First of all, enforcement would definitely be easier for FWP wardens. Secondly, it is stated in the draft of the desire to simplify regulations. This is especially true on the upper Madison. My reasons for supporting a standard 5 trout 1 over 18" limit throughout the central fishing district are pretty simple. Many of us fish several different rivers during a fishing trip. If I harvest three 16" fish and a 19" fish on river A which has a 5 fish limit with 1 over 18" and then go to river B later that day which has a 5 fish limit with only 1 over 14", I am violating the law according to the current regulation booklet.	22)
Madison River	A major issue on Montana rivers, especially the "blue ribbon" streams like the Missouri below Holter, the Madison, and others is the proliferation of outfitters on the water. It's had a real negative impact on fishing opportunity and the enjoyment of spending time on the streams. While I understand that Outfitters and Guides do have a role they provide, there needs to be limit in the number of days they should be allowed on the water. There also should be a limit to the number of Outfitters and Guides that are allowed to operate. The commercialization of fishing should not be an acceptable use that overshadows the average citizen's opportunity to spend some time on the river. I hope that this issue is addressed in the near future, because the longer it goes on the more difficult it will be to take action. That would be unwise, as the resource will be impacted and the average fisherman/woman will likely reduce or possibly quit fishing altogether because it is no longer enjoyable.	23)
Madison River	I live full time in Ennis. Your group must start somehow to regulate the number of boats on the Madison River. It is hammered, you only know about guide trips, NOT the others that are overusing the river. It is a a mess, especially allowing Idaho guides to use it and pay nothing and no regulations. We have seen 100 boats in an hour. Just gets worse and nothing is done. Sad.	23)
Marias River	Page 308 to 309, Fisheries Management Section, Paragraph 3: "The reach of the Marias River above Tiber Reservoir includes both coldwater and warmwater species and becomes primarily a warmwater fishery near Tiber Reservoir (Lake Elwell) where walleye are the most abundant game fish. Coldwater	24)

Waterbody	Comment	Response
	<p>game fish, including rainbow trout and mountain whitefish, also inhabit this reach, but in lower numbers. Northern pike, yellow perch, and burbot are other resident fish species of interest to many anglers.” The 1954 Marias River Restoration project report (Federal Aid report by Nels Thorsen, Montana project number F-15-D-2, 1956) identifies six species of warm water fish including Sauger, Channel Catfish, and Shovelnose Sturgeon. We recommend that efforts to update the species inventory for the Upper Marias should be initiated and consideration given to manage this reach as a warm/cool water assemblage for recreational species such as Sauger, Channel Catfish, and/or Shovelnose Sturgeon.</p>	
<p>Marias River</p>	<p>Because Sauger are a Montana species of concern, and pursuant to the stated goal under “Native Species Management” (page 13), it would seem appropriate to consider inclusion in the discussion re-establishing a sauger and possibly a shovelnose sturgeon population in the Upper Marias (and possibly any other native species that were extirpated during the Marias Restoration Project). While there would be hybridization potential with walleye, this threat could be mitigated by stocking sterile walleye in Tiber Reservoir, as is the case in Bighorn Lake. The upper Marias lacks many of the issues that have been identified as limiting factors for other Sauger populations (mainly altered temperature and flow regimes due to barriers and impoundments). The upper Marias has a mostly natural flow and temperature regime and no barriers or impoundments, which may improve the probability of re-establishing a robust population of sauger.</p>	<p>24), 25)</p>
<p>Marias River</p>	<p>There is also no mention of dace conservation in the Upper Marias River Watershed. Pearl Dace and Northern Redbelly Dace are often observed in these tributaries and occasionally in the mainstem of Birch, Two Medicine, Cut Bank, and Badger Creeks. Populations that occur on the reservation are well documented. Because there may be a lack of data on the Upper Marias, there may be potentially undocumented populations of Pearl or Northern Redbelly Dace in small tributaries (both species show an affinity for prairie spring creeks). We recommend additional surveys for these species be conducted in these areas.</p>	<p>26)</p>
<p>Missouri River</p>	<p><b><u>All comments submitted on the Missouri River focused on Walleye and coldwater fish management below Holter Dam. See sections on Missouri River Walleye and Walleye Status for response to Missouri River comments.</u></b></p>	
<p>North Fork Blackfoot</p>	<p>Page 138. “Continue closure for intentional angling of bull trout and enhancement of angling opportunity for westslope cutthroat trout. Consider reintroductions of westslope cutthroat and introduction of bull trout in the streams and lakes in the Wilderness area of the North Fork upstream of the North Fork Falls.” We hope to continue to partner with FWP and the FWS and wilderness</p>	<p>27)</p>

Waterbody	Comment	Response
	managers on the best and most feasible strategy that will be compatible with both agencies mandates and support native and listed fish conservation and recovery.	
North Fork Flathead & Tributaries	In regards to additional "locked in" management plan, regulations and restrictions, I don't think the management plan addresses additional opportunities to allow more recreational fishing as part of the conservation plan within restricted waterways. Specifically, it seems if the North Fork Flathead River Tributaries were opened to recreational fishing under strict regulations and permitting, then additional conservation funds and visibility to the fisheries would be possible. Additional usage would generate revenues to increase FWP/State funds, conservation awareness and education while trying to "manage" NF Flathead River tributaries. Every year we participate in hunting activity surveys, why not let the people who frequent the waterways recreate and provide "boots on the ground" information through special usage permits. After the fires and subsequent privately contracted "restoration" of NF Flathead tributaries, I've always wondered why Montana has not followed examples of other fishery management groups in other wild places states. I have been waiting for those tributaries to open up to recreational fishing. To be more specific, the recreational use of the NF Drainage continues to grow and yet we can't fish its tributaries.	28)
North Fork Flathead & Tributaries	My "COMMENT" which is more of a suggestion, would be for FWP and fisheries management teams to review and consider opening CLOSED tributaries to fishing through managed use. Specifically, allowing very restrictive use through physical fishing equipment restrictions, fishing technique restrictions and paid permits (like the old bull trout stamps). Such as combination of barbless catch and release would generate conservation funds while also providing greater opportunities to recreational users. Existing FSR bridges or near the water FSR routes could be used as "fishing access" with a pit toilet if appropriate, parking area, picnic and dry camp accommodations and access to previously closed areas is better than one million tourists stopping on the side of the North Fork road and fishing a stream or creek because they don't know any better.	28)
Noxon	I feel a lesson could be learned from the FWP recent action to cease suppression of walleyes in Noxon Reservoir. The official "word" is that FWP will allow anglers to manage and control walleyes by hook and line. That is a breath of fresh air in this part of the world.	29)
Noxon	I wish Montana would do more to manage for non-native species. I LOVE fishing for smallmouth bass and walleye. I would like to see more done to expand their habitat in Montana. I am an angler living in Butte and I do 80% of my fishing up in the Noxon area because of the warm water species living there. Any place that can support these fish should be a high priority. Trout can live almost anywhere in Western MT, but only a few places have bass/walleye.	30)

Waterbody	Comment	Response
Noxon	Page 175: Noxon Reservoir is still listed for a management type of “Suppression” on Noxon Reservoir. FWP has recently said that they plan to give up on walleye suppression other than liberal angler regulation in the reservoir. After decades of a policy of not allowing populations of walleye west of the Continental Divide, this decision seems to be a poor choice. The department admits that the walleye population is growing, likely to overpopulate the reservoir and reduce popular game species while overpopulating the reservoir . Downstream states continue to fight a growing threat from invasive walleye in Pend Oreille, Lake Roosevelt and the Columbia Basin and some of these fish have come downstream from Montana. The Noxon walleye population provides a growing threat to other waters west of the divide by providing a ready source for bucket biologists and we know from experience that these fish will continue to spread. We think it would be worth the expense and effort to at least try to crash the walleye population in Noxon Reservoir through aggressive mechanical removal.	29)
Painted Rocks Reservoir	Page 145, Bitterroot River Drainage. It is nice to see the area above Painted Rocks Reservoir identified as a genetic stronghold for pure WCT. We support and implement efforts to expand these populations and believe that the enhancement of adfluvial bull trout in and above the Reservoir should be emphasized as well.	
Rock Creek	Page 129, Rock Creek and tributaries. We strongly support liberal harvest regulations to reduce numbers of brown trout. We continued, and expanded efforts to evaluate effects of brown trout on bull trout. We support adaptive fisheries management to help tip the balance of fish production in favor of native fish over status quo non-native fish production. We recognize there are no silver bullets, and probably no win-wins for fisheries management (native an non) in such a large open system but we also would like to see adaptive efforts considered and pursued.	31)
Shields River	Page 390-391 Shields River and Tributaries-(Upstream and Downstream of Chadbourne Diversion). It is stated in the habitat needs and activities: work to improve stream flow and water temperatures. I would stress to FWP that if ways to keep water in smaller tributaries were found, those waters would help increase stream flow and may lower water temperatures.	32)
Silverbow Creek, Warm Springs Creek, Silver Lake	Page 112, Upper Clark Fork River Drainage. We support Silverbow, Warms Springs, and Silver Lake Management direction. Would like to see additional specifics on connectivity, flow, and non-native fish suppression actions for native fish.	33)
St. Mary	In reference to Table 1 on page 7... Brown Trout do not and have NEVER existed in the St. Mary drainage (ecoregion). The nearest Brown Trout population is found to the east in Duck Lake, which has	34)

Waterbody	Comment	Response
	no outlet and lies within the N.Fork Milk River basin (Blackfeet Reservation). Brown Trout have never been introduced to the St. Mary drainage.	
St. Mary	Table 1, Pages 7 and 8: While we recognize that the St Mary River ecoregion is excluded from the Plan, we wanted to point out that some species are missing from the list of species associated with this ecoregion. We recommend that FWP add the following species and designations to improve the accuracy of this table as it relates to the St Mary Ecoregion: Mountain Sucker (N), Pearl Dace (N), Lake Chub (N), Brassy Minnow (N), Northern Redbelly dace (N), White Sucker (N), Brooke Stickleback (N), and Fathead Minnow (I). We also wanted to point out that in FWP’s mFish database, the range map for Brown Trout over- exaggerates the extent of this species in the St. Mary River Watershed. Our data only indicate Brown Trout presence in Duck Lake (stocked) which is consistent with mFish locational data when “General by Species” is selected. Thus, we believe mFish’s range map for Brown Trout in the St Mary River Drainage is inaccurate as it seems to include waters that do not have Brown Trout. We recommend revising Brown Trout’s range map for this area.	35)
Swan Lake	Page 90-91: FWP should take similar measures for Lake Trout that are used on Yellowstone Lake.	36)
Swan Lake	Adaptive management efforts on non-native lake trout suppression in Swan Lake was a notable effort in support of trying to do more to secure critical bull trout core area. We are disappointed that the State does not appear committed to a second phase of NEPA and experimental lake trout suppression that we believe could lead to better adaptive management in the future. In total, however, these efforts set up additional opportunities for strategic stream and watershed improvement actions fundamentally important to further securing natal habitats for native fish. This is hugely important to the Forest Service as part of its National Forest Management Act mandate.	36), 37)
Swan Lake	Page 91, under Swan Lake Drainage, Special Management Issues. “Additionally, collaborative solutions will continue to be explored for ways to protect the bull trout population of the Swan Valley.” We support the next NEPA phase of lake trout suppression that appears is being coordinated by the FWS with support from the FS.	36), 37)
Swan Lake, Lindberg Lake	Page 92 and 94, “Enhance migratory populations (bull trout) for conservation” in Lindberg and Swan. What does this entail? Especially in Swan where experimental netting to reduce lake trout is no longer being pursued by the state.	36), 37), 38)
Swan River, Heart Lake, Island Lake	Page 95, Swan River and Tributaries (Swan Lake to Flathead Lake). “Eliminate harvest and enhance fluvial populations for conservation and WCT angling. Consider isolation of WCT populations if hybridization is a threat and habitat is sufficient to allow persistence.” This is basically the status	39)

Waterbody	Comment	Response
	<p>quo. However, we have concerns about eliminating WCT harvest on Swan tributaries. The tributaries have little angling pressure anyway no harvest may antagonize the angler any more than necessary. We like to tell people that we have conserve WCT and doing so will not remove any fishing opportunities. The report is confusing about what it recommends on Swan River proper (above the lake). "Manage trout (RBT) harvest to support recreational fishing and minimize impacts on native fish." This is at the expense of native fish. Standard harvest regulations for RBT would be appropriate. Montana FWP should completely halt stocking golden trout in Heart and Island Lakes. That is counter-productive and unneeded.</p>	
Thompson River	<p>Page 165, Lower Clark Fork River. We acknowledge the huge problem the redundant road system in the Thompson River poses and hope to continue to work with partners on a longer term, and hopefully larger in scale solution.</p>	
Tiber Reservoir	<p>The Divison should amend the Draft to include an evaluation component for supplemental stocking during poor spawning conditions in Tiber Reservoir and Lake Francis.</p>	16), 40)
Tiber Reservoir	<p>In the State Wide Fisheries Management Program Guid Part 1 Introduction and purpose it states " the FWP Fisheries Division preservers maintains and enhances aquatic species and their ecosystems TO MEET THE PUBLIC DEMAND FOR RECREATIONAL OPPORTUNITES AND STEWARDSHIP OF AQUATIC WILDLIFE." I fail to see where this was acomplished in the last 10 years in Central and Western MT in regards to our request for better Walleye fishing. We have seen what stocking of walleye can do for a body of water in Fresno Reservoior. We have seen what the lack of and reduction has done to Lake Francis Reservoior. Walleye Fisherman have begged for Stocking of Walleye in Tiber Reservoir only to be refused by FWP. Walleye fisherman do not just fish walleye for the enjoyment of fishing but walleye is one of the best eating fresh water fish in North America. Please enhance our walleye fishing opportunities as your Fishery Management Plan States that you will. I am Joe Public and this is what I would like to see happen.</p>	16), 18), 40)
Tiber Reservoir	<p>(1) Page 314. Tiber Reservoir. Should include some direction to evaluate supplemental stocking to temper the negative trends when there are poor spawning conditions resulting in missing year classes of fish.</p>	40)
Tiber Reservoir	<p>For Tiber?..forage habitat improvement projects need to be evaluated and continued on an annual basis.</p>	41)

Waterbody	Comment	Response
Tiber Reservoir	#6 NEED A BETTER MANAGAMENT PLAN FOR TIBER LAKE	
Tiber Reservoir	Page 314 Tiber Reservoir. Should include some direction to evaluate supplemental stocking to temper the negative trends when there are poor spawning conditions resulting in missing year classes of fish.	40)
Tiber Reservoir	Page 314. Tiber and Francis.....NO data listed, no net data, nothing. Our biggest reservoirs in R4 and they are not managed at all for quality fisheries. Nothing changes, just let it ride is the management choice. FWP management goal: Manage for a consumptive harvest with an opportunity for a trophy fish. Manage based on the biology of the fishery. Emphasize natural recruitment. HOW ARE YOUR DOING THIS??	18), 40)
Tiber Reservoir	FWP needs to make the Walleye Native to Montana based off of newer scientific evidence then what they are basing them not being native to. They need to contact American Fisheries Society and talk to the scientists that proved Walleyes are Native to Montana and stop fighting so hard against the walleye. Everything FWP does with about walleye in bias and negative that needs to change. The no limits on walleye below holter dam on the river needs to change. The no possession limit on walleye below holter dam needs to change to a reasonable amount 5 walleye. Tiber Fresno and Francis need to be managed better the numbers of walleyes per net there are down. 3 year running average on walleye in the gill nets and other fish needs to change. FWP needs to look into the mirror and really think about what they are doing because whats happening in western Montana with Walleyes is gross criminal bias and prejudice toward another species and should be against the law and the fisheries division management and biologist should be held accountable and should lose there jobs.	18), 40)
Yaak River	Page 77, under Yaak River. Support for the liberal brook trout harvest and potential pursuit of other reduction or elimination efforts.	

#### FWP Response to Waterbody Specific Comments

Response Number	Response
1)	Trout regulations for the Bighorn River are standard Central Fishing District regulations, except artificial lures only from below Afterbay Dam to Bighorn FAS. Biologically increasing harvest could improve fish size and growth but is generally not supported by much of the angling community, plus most anglers catch and release fish only. FWP will continue monitoring the fish population and may consider lifting artificial lure restrictions to increase rates of harvest. Such effort will also likely involve an education campaign to promote the benefits of harvest in a recreational fishery.



Response Number	Response
2)	Limits for brown trout were liberalized in the East and West Forks of the Bitterroot, otherwise there has been public resistance to liberalizing brown trout harvest. Brown trout limits have been liberalized in other areas (such as Rock Creek) but have seen no increase in harvest due to high rates of catch and release fishing. This severely diminishes the effectiveness of using angler bag limits to influence fish populations.
3)	The conservation/restoration program has focused on increasing watershed connectivity to conserve life history diversity (i.e. migratory populations), while identifying specific areas to maintain or establish isolated, secure strongholds of native species. The North Fork Blackfoot River above North Fork falls is an area identified for the removal of non-native trout, and subsequent establishment of native trout species. Increasing native species production through continued targeted restoration in priority tributaries, rather than removal of non-natives, is likely the most effective form of native species conservation. Further liberalization of harvest limits is probably not a viable method to reduce abundance of non-native trout because most anglers do not harvest fish. The most recent creel survey data in 2004 showed 98% of interviewed anglers released all fish caught (Pierce et al. 2006), which had increased from 95% in 1999 (Schmetterling and Bohnemann 2000) and 84% in 1994 (Peters and Workman 1996).
4)	Population monitoring indicates that restrictive regulations are not biologically relevant here. For the 2020 fishing regulations FWP is going to consider adopting Central District combined trout regulations and drop the 1 fish over 18 inches size criteria for the Boulder River and tributaries. The length restriction in the river above Hawley Creek would change to 1 fish over 18 inches.
5)	This statement was carried over from the 2013 document. FWP consistently receives reports and observations of smallmouth bass upstream of the Flathead River mouth. These movements appear to be seasonal with no established population in this Clark Fork reach. This information will be updated in the Program and Guide.
6)	Noted spelling errors will be corrected. Based on the species distribution from the Montana Natural Heritage Program, brown trout are present in lower Cut Bank Creek. Since much of Cut Bank Creek is tribal land FWP has limited data and would work with the FWS and the tribe to update appropriate species distribution. Based on the Montana Natural Heritage Program, species present in Cut Bank Creek are brown trout, burbot, emerald shiner, fathead minnow, flathead chub, longnose dace, longnose sucker, mottled sculpin, mountain sucker, mountain whitefish, rainbow trout, and white sucker. FWP agrees that this is a mixed coolwater and warmwater species assemblage.
7)	The Dearborn River is currently managed for rainbow trout and brown trout with no plans to actively manage for walleye.

Response Number	Response
8)	Fishing pressure is low in Fishtrap Creek, with low levels of angler harvest. Anglers are allowed to keep three brown trout per day which is a relatively liberal limit considering the low densities of brown trout. Calling attention to the stream with exaggerated limits could increase angling pressure which increases risk of incidental catch of bull trout. We are proposing to allow year-round harvest of brown trout in the mainstem Thompson River beginning next year. Brook trout fall under the general rule of 20 fish per day.
9)	Based on redd counts and lake monitoring the bull trout population has been relatively stable since the late 1990s. FWP will continue monitoring the Flathead Lake drainage to identify threats and opportunities for protection and restoration of native species. FWP will continue to work with the CSKT and other agency partners to identify opportunities to improve native fish abundance.
10)	Although the Flathead Lake co-management plan expired in 2010, FWP and the CSKT will continue to cooperatively manage the Flathead Lake fishery. There are no immediate plans in place to update the co-management plan.
11)	Walleye are the primary management species in Fresno Reservoir. Current and future management of walleye in Fresno will emphasize sustainable relative abundances that promote good walleye growth rates and a diverse age structure. Supplemental walleye stocking will be evaluated based on current walleye abundance, walleye growth and condition, forage abundance and reservoir water conditions.
12)	This management strategy is currently being implemented at Fresno. Current and future management of walleye in Fresno will emphasize sustainable relative abundances that promote good walleye growth rates and a diverse age structure. Supplemental walleye stocking will be evaluated based on current walleye abundance, walleye growth and condition, forage abundance and reservoir water conditions.
13)	Fishing pressure is low in Graves Creek, with low levels of angler harvest. Non-native fish densities are also low. Adding exceptions with exaggerated limits would call attention to the stream, increase pressure, and increase incidental hooking of adult bull trout.
14)	Holter Reservoir fisheries management objectives are outlined in the Upper Missouri River Reservoir Fisheries Management Plan, which is currently under revision.
15)	Central Fishing District combined trout regulations will be considered when the population reaches pre-drought abundance.
16)	Walleye plants in Lake Frances and Tiber are considered and/or stocked biennially (every other year) and not biannually (twice every year).
17)	These are good criteria for maintaining recreational walleye fisheries. Stocking frequency for Lake Frances will be determined by metrics mentioned in the comment as well as availability of fish to stock.

Response Number	Response
18)	Survival of stocked walleye is not as high in Lake Frances as in other walleye waters. Historically 13-15% of stocked walleye survive in Lake Frances, compared to 35-45% recruitment of stocked fish in Fresno. Fresno has not been stocked since 2011 and average length and relative weight has increased since stocking has stopped. Annual monitoring in Lake Frances in 2018 captured the highest abundance of walleye ever with good distribution of age and sizes, and a large number of age 1 fish which indicate a good spawn in 2017 (which was a good water year for Lake Frances). Forage abundance is also high, which is the likely reason for low walleye catch rates despite higher levels of abundance. Walleye populations are very dynamic with a variety of factors limiting recruitment; simply stocking more fish might not have the desired consequences and could potentially harm the fishery.
19)	The purpose of the Program and Guide is to provide the public with the rationale behind the fisheries management approach and direction of the Fisheries Division. It is not intended to identify stream reach specific prescriptions for fisheries management. The specific adaptive approaches for native species conservation and management are determined locally and reflect the management type and direction identified in the Program and Guide. Opportunities for active management are identified through routine and exploratory monitoring and are considered and prioritized based on a suite of factors including feasibility, urgency, and likelihood of success among others.
20)	Over the last 10+ years electrofishing surveys throughout the Little Blackfoot River have not resulted in captures of any pure bull trout. While this information would indicate a viable population does not currently exist in the Little Blackfoot River, the potential eDNA detection and captures of a couple phenotypic hybrid bull trout indicates additional surveys are warranted. Though eDNA is a not a fail-proof science and sample technique, FWP has and will use this recent information to focus additional electrofishing surveys. If it is determined that bull trout are established in the drainage, additional consideration will be given to their management needs in the drainage.
21)	FWP will continue to pursue opportunities to simplify the regulations. Past efforts to simplify the regulations did not have public support.
22)	Biologically many trout fisheries are resilient enough to allow additional harvest of fish. Many fisheries could sustain or even improve quality with increased levels of harvest. If monitoring determines that angling pressure or other limiting factors on a waterbody are impacting the fishery then lower bag limits and/or length restrictions may be implemented. On some waterbodies implementing standard district regulations or adjusting length restrictions has been proposed but not supported by the public.

Response Number	Response
23)	River recreation management is a high priority issue, especially on the Madison River. A negotiated rulemaking process is currently underway where stakeholders with recreational interests in the river work together to identify solutions to user conflicts. Recreation rules that are developed on the Madison may serve as a template for other waterbodies in the state; however, the Department does not expect a one size fits all approach that applies to all situations on all waterbodies with recreation conflict.
24)	Other fisheries management priorities have precluded FWP conducting sampling surveys in the Marias above Tiber Reservoir for some time. FWP will conduct monitoring surveys as workload allows.
25)	Monitoring surveys in the Marias above Tiber Reservoir would need to be conducted to identify enhancement opportunities for sauger and shovelnose sturgeon populations. Shovelnose sturgeon are present in low numbers in Tiber Reservoir, so they are possibly present in the Marias River as well.
26)	Much like the river above Tiber Reservoir, there has been limited FWP surveys in the upper Marias. FWP agrees that there may be undocumented populations of Perch Dace and Northern Redbelly Dace in prairie streams of the upper Marias. FWP will conduct monitoring surveys as workload allows.
27)	FWP remains committed to conducting the North Fork Blackfoot Native Fish Conservation project above North Fork falls. We continue to work with the Forest Service to make progress towards full project implementation.
28)	Fishing closures on tributaries to the North Fork of the Flathead are intended to protect bull trout. Bull trout are very vulnerable when they are in small tributary streams and an angler fishing for other species, such as westslope cutthroat trout, would have a high likelihood of catching several bull trout. Bull trout angling is not allowed anywhere else in the Flathead River system and allowing angling in tributary streams would compromise this strategy.
29)	Research has shown that the Noxon walleye population is largely self-limiting due to habitat limitations and typically high flows during the spawning period. Efforts by FWP to suppress the walleye population largely failed due to high flows disrupting capture efficiency, skewed sex ratio towards males (few female fish were captured), and excessive bycatch. Creel surveys indicate that angler harvest removes more fish than FWP suppression efforts. Suppression management type will be maintained at Noxon, but habitat limitations and angler harvest will be the primary suppression tools. Population monitoring will continue and additional suppression tools will be considered if walleye population levels increase.
30)	FWP will continue to identify opportunities to manage for non-native species, including smallmouth bass, where appropriate. Factors that are considered before any species is introduced to a waterbody include impacts to the existing fishery, impact to native species, and impacts to adjacent waterbodies. Noxon Reservoir is actively managed for smallmouth and largemouth bass with restrictive regulations in place to reduce harvest of larger fish.

Response Number	Response
31)	Liberal limits for brown trout have been implemented, but they are largely ineffective. The majority of anglers do not harvest fish, making liberal harvest regulations largely ineffective.
32)	FWP will continue to identify opportunities to improve instream flows to enhance fish habitat and moderate stream temperatures.
33)	<i>Lindstrom?</i>
34)	The only brown trout found in the St. Mary drainage are present in Duck Lake, which falls in the St. Mary 4th level HUC.
35)	Species distribution in the St. Mary ecoregion is based on species distribution from the Montana Natural Heritage Program. FWP will work with the Fish and Wildlife Service and the tribe to update species distribution in this ecoregion.
36)	Montana FWP and the Swan Valley Bull Trout Working Group completed a feasibility study in 2016 to determine whether a certain amount of gillnetting was sufficient to cause a decline in lake trout abundance and a subsequent increase in kokanee and bull trout. The study concluded that the level of effort used (3 weeks of netting in August and 3 weeks of netting in October) was not sufficient to cause this decline. That level of effort was established because of constraints in funding, manpower, and concerns for collateral damage to the bull trout population in the form of inadvertent bycatch. FWP will continue to monitor the lake trout and bull trout populations, and if alternatives that would increase lake trout mortality while decreasing bull trout bycatch are developed, they may be used at that time.
37)	Montana FWP has been working with the USFWS and the USFS to help develop a NEPA document that would satisfy both FWP's and USFWS's requirements for actions taken in Swan Lake. FWP will continue to work with the USFWS to develop alternatives that would increase lake trout mortality while decreasing inadvertent bull trout mortality.
38)	Enhance migratory populations is intended to improve fish passage and barriers that inhibit bull trout migration and pursue habitat improvements to link fragmented habitats. FWP will continue to monitor the lake trout and bull trout populations, and if alternatives that would increase lake trout mortality while decreasing bull trout bycatch are developed, they may be used at that time. In the case of Lindbergh Lake, a previous telemetry study was conducted to identify potential lake trout spawning locations. Lindbergh Lake contains a relatively small bull trout population, and gill net suppression may not be feasible because of bull trout bycatch concerns. However, if innovative techniques being tested in Yellowstone Lake prove worthwhile, the knowledge gained from past telemetry studies could be used in Lindbergh Lake.

Response Number	Response
39)	The Swan River upstream of Swan Lake has historically been managed as a recreational rainbow trout fishery. In recent times, there has been a growing interest in trying to restore migratory westslope cutthroat trout populations in the Swan. It may be possible to make regulation changes to allow for some harvest of rainbow trout in the upper Swan River. The idea of changing to the Western District standard would allow for rainbow trout harvest and would simplify the regulation booklet. A side benefit to this regulation change would be additional communication to the public about the conservation value of westslope cutthroat trout in the Swan drainage. With regard to Heart and Island Lakes, these lakes are two of only a few opportunities in the state to catch golden trout. They are stocked very infrequently and at a very low density. While there is some risk of downstream dispersal, both lakes drain to Crescent Lake, which is managed as a put-grow-and take westslope cutthroat fishery. Additionally, the downstream tributaries contain mostly brook trout and rainbow trout, and golden trout represent minimal risk to those fisheries.
40)	Tiber walleye have provided adequate recruitment through natural reproduction after stocking that occurred in the early 1970s and again in 1986 and 1988. Hatchery stocking may be considered based on trends in forage abundance, reservoir water levels, growth, recruitment, relative weight, and reservoir-wide relative abundance. This has been clarified in the final Program and Guide.
41)	Habitat enhancement on Tiber using recycled Christmas trees will continue as workload and funding allow. The project was not completed in 2019 when staff changes in Region 4 precluded coordination of funding from Bureau of Reclamation.

**Walleye Status Comments**

At the December commission meeting walleye advocates presented information from peer-reviewed literature that indicated walleye were a native species in much of Montana east of the Continental Divide. FWP did an extensive literature search and interactions with experts across North America and determined that walleye are currently appropriately classified as a non-native species in Montana. This topic garnered 232 comments, with 207 comments supporting maintaining the current non-native status of walleye and 25 comments supporting designating walleye a native species.

Walleye Status	Comment	Response
Walleye Native	Concluding public comment prior to addressing conclusive findings that walleye is a native species deprives the public of its right to participate and marginalizes the value of public comment.	1)

Walleye Status	Comment	Response
Walleye Native	The Division must provide the public with its conclusions after reviewing leading fisheries scientific reports identifying walleye as a native species and provide the public an opportunity to submit written comment.	1)
Walleye Native	The Division should inform the public of how the Draft would change or revise under consideration of walleye as a native species.	2)
Walleye Native	1. The native range of walleye needs to be changed.	3)
Walleye Native	It would seem that the scientific and biological data that is now available and significantly advanced with genetics and DNA that it is the best information now available and it has been widely accepted by nationally recognized experts across the US and Canada.....but MT Fisheries staff can ignore it. Something is wrong.	3)
Walleye Native	Walleye are just a native to Montana as sauger. There are no stop signs or dams to keep walleye spawning below dam. Yet there's a limit on planted rainbow on the upper Missouri river it none on walleye. Really not hard to figure out. Trout's unlimited is bending fwp disicions with \$\$\$\$\$. As President Trump would say you all need to be fired and hire unbias and coman sence employees	3)
Walleye Native	The only item on the plan that would like to see is East of the continental divide that walleye is a native fish. Other states on this side of the divide have excepted the fact walleye are a native fish and should managed as such. The other item is how FWP is managing our fishery with the three year average and the triggers. It is hurting our fishery drastically. It seems the FWP does not want any happy fisherman. "It is sad" Case and point is Canyon Ferry. You can be on CF for six hours and not catch a fish. It is very hard to get kids excited about fishing. We need to changed what we are doing. Another thought is use biology as a tool and not all we know.	3)
Walleye Native	1. table of contents page 11 chart there is plenty of documentation on fact walleye are a native species and should be listed as so.	3)
Walleye Native	Page 4-5. In my opinion the walleye is native to Montana and not introduced.	3)
Walleye Native	(1) Page 4-5. Montana Fisheries Resource. This states Montana is home to 91 species of fish; 59 native to the state?.and the chart on page 9 says ?walleye? are ?introduced? to Montana. This is not correct and should be changed. There is substantial documentation that has been published by credible sources that clearly show that the native range of walleye includes an area east of the Continental Divide in Montana.	3)

Walleye Status	Comment	Response
Walleye Native	How can walleye not be native when Canada to the North and Dakota's to the east walleye are considered native. Sounds like numerous studies and credible facts have been collected to substantiate walleye are native. This topic needs to be readdressed.	3)
Walleye Native	I feel that walleye should be considered a native fish East of the continental divide in Montana. There is significant data that proves that walleye is native to Montana and very little data that states walleye are not a native fish of Montana. Walleye are classified as a native fish directly to the North of us in Canada and to the East of us in North Dakota. There are water tributaries that are common to Canada, Montana, & North Dakota. It only makes sense and has been proven scientifically that walleye is a native fish to Montana.	3)
Walleye Native	I have been fishing walleye in the state of Montana for many years and see that these fish have been improperly harvested (wasted) due to the stigma placed on these fish by many anglers fishing for trout within our state. Moreover, it is believed that below Holter Dam is still considered Holter Lake in which the same regulations should be applied. On a different note, although many do not believe that walleye are a native species in Montana, either are rainbow/brown trout; and there is no documentation that I have seen to support that they are but are treated as such. Walleye however do have some documentation to support such claim and are being ostracized from our water systems here in Montana. I've heard of a thousand plus trout being caught within just a few miles on the Missouri River system and have not heard of such numbers of walleye; which indicate a lack of support to control these populations. I think it boils down to bias as I am an angler that loves to fish for not just walleye, but trout and others species of fish. With that, bias should not dictate management and limits need to be set so that our later generations can enjoy all the different species of fish that Montana offers.	3), 4)
Walleye Native	I believe walleye should be identified as a native fish to Montana.	3)
Walleye Native	#1 WALLEYE SHOULD BE CONSIDERED NATIVE SPECIES TO MONTANA PER BIOLOGY , MANAGAEMENT AND CULTURE OF WALLEYES AND SAUGER BY AMERICAN FISHERIES SOCIETY EDITOR BRUCE BARTON CHAPTER 4 PAGES 105 -132 SEE BOOK FOR DETAILS.	3)
Walleye Native	Table 1. states walleye are not native. untrue. apparently AFS and other peer reviewed publications are lying by stating they are native.	3)
Walleye Native	2. Recognize Walleye as a native fish to eastern montana as per "American Fisheries Society"	3)
Walleye Native	Fwp's current model of compiling a running average of 3 years of gill-net data before enacting change is extremely detrimental to potentially positively effect the future of our fisheries. For example Holters current sample data shows an extreme drop in yellow perch populations going from 60-80 fish per net	3)



Walleye Status	Comment	Response
	<p>in the past to 7 this fall, however with the current model nothing will be done to potentially remedy this for the next three years. At that point the damage is done without being able to make any effort whatsoever to change these problems while they are occurring. There is clear evidence that Walleyes native range included Montana, east of the continental divide. Montana FWP's current classification of walleye as an introduced non native species has done nothing but negatively impact their position in Montana as a highly sought after species. This classification needs to be removed and amended in order to move forward with our fisheries management plans. The no limit of walleye below Holter dam has created and enforced a divide within our fishing community. Walleye are stigmatized and demonized by the trout "purist" crowd and by eliminating the limit on walleye in this stretch of water to "protect" trout populations has done nothing but to divide fisherman based on their preferred method of take. Trout and walleye absolutely coexist throughout the country.</p>	
Walleye Native	<p>Moreover, the public was at no time aware of what the Division presented [to the American Fisheries Society]. The presentation was not announced to the public. The materials were not circulated to the public. Instead, the Division announced that the Division would follow up on the presentation at a time in which the public would be invited on February 28.</p>	1)
Walleye Native	<p>FWP needs to make the Walleye Native to Montana based off of newer scientific evidence then what they are basing them not being native to. They need to contact American Fisheries Society and talk to the scientists that proved Walleyes are Native to Montana and stop fighting so hard against the walleye. Everything FWP does with about walleye in bias and negative that needs to change. The no limits on walleye below holter dam on the river needs to change. The no possession limit on walleye below holter dam needs to change to a reasonable amount 5 walleye. Tiber Fresno and Francis need to be managed better the numbers of walleyes per net there are down. 3 year running average on walleye in the gill nets and other fish needs to change. FWP needs to look into the mirror and really think about what they are doing because whats happening in western Montana with Walleyes is gross criminal bias and prejudice toward another species and should be against the law and the fisheries division management and biologist should be held accountable and should lose there jobs.</p>	3)
Walleye Native	<p>The new scientific information on the range of Walleye, showing that they are native East of the continental divide in Montana, needs to be addressed before the state management plan can be approved. This plan needs to be put on hold until the native status of walleye is determined. Also the management goals bellow Holter Dam need to be based on science not politics</p>	3)

Walleye Status	Comment	Response
Walleye Non-native	MWF would like to emphasize that FWP’s current management direction for walleye is appropriate and that there should be no change or designation of the species as “native” to the State of Montana. The department currently has the tools to manage the species where appropriate while continuing suppression efforts to protect other valuable fisheries.	3)
Walleye Non-native	Please find attached a copy of comments from George Grant Chapter of TU and it's 400 plus members. We encourage you to keep the line that you are on regarding not only the management of Walleye but more importantly the designation of Walleye as an introduced species.	3)
Walleye Non-native	Without credible evidence that walleye was in eastern Montana prior to European establishment, it would be very bad science and management by FWP to make this change on a social preference. It would also place them under similar management as true native species (cutthroats, bull trout, and others) which isn’t equitable.	3)
Walleye Non-native	We are aware that Walleyes Unlimited has proposed that FWP designate walleye as a native fish to the waterways of Montana east of the Continental Divide. Pat Barnes Trout Unlimited does not support this change to the fisheries management plan because there is no good evidence maintaining this claim. We support the peer-reviewed science that guides FWP’s current classification of walleye as a non-native species in the Upper Missouri River.	3)
Walleye Non-native	MTU has become aware that there are proponents of designating walleye as a native fish east of the Continental Divide. There is no good evidence for this claim.	3)
Walleye Non-native	<b><u>There were 114 comments provided that included this comment:</u></b> “The Statewide Management Plan & Guide should uphold the current status of walleye as a non-native species in Montana’s waterways. I support the peer-reviewed science that guide’s the Department’s classification of this illegally-introduced species as non-native to Montana. Additionally, I support the full suppression of walleye management in the Missouri River below Holter Dam. People cross continents to fish for wild trout in the Missouri River, and altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to our local economy.”	3)
Walleye Non-native	SMTU has become aware that there are proponents of designating walleye as a native fish east of the Continental Divide. There is no good evidence for this claim.	3)
Walleye Non-native	I support the department's current listing for Walleye on the Missouri as a "non-native" species.	3)

Walleye Status	Comment	Response
Walleye Non-native	Please do not list walleye as Native anywhere in the state of Montana	3)
Walleye Non-native	Walleye are not naive to the Mo river watershed . Please do nothing to encourage growth , in fact I think you should put a bounty on them. Well maybe that s a little extreme.... Maybe a free booklet of Walleye recipes with each fishing liscense.	3)
Walleye Non-native	I want to express my deep concern to change the status, and as a result, the management of Walleye in Montana. I think it is a bad idea to reclassify Walleye as a "native" species in areas where they have been scientifically shown to be non-native and in some areas, even illegally introduced. This is especially true for the Walleye that are now in the Missouri River system below Holter Dam. This is undoubtedly one of the finest wild trout fisheries in the nation and many people, businesses, communities and the state at large benefit from this amazing fishery -socially, culturally and certainly economically. I know this first hand as I have a 26 year old business that is supported primarily by this fishery and I employ over 14 full-time Staff members every year and many more independent contractors as Guides each year. I realize that Rainbow and Brown Trout are non-native as well but I think we would all agree that they are very well established in this river system and trying to switch this fishery back to purely native Cutthroat Trout would be foolish both socially and economically. It's even more foolish to risk this fishery by managing Walleye as a native species or anything other than full suppression in the MO below Holter. That would be devastating to the economy. Please base your management decision on the skillful men and women in the Department that have dedicated their lives through advanced degrees and ongoing studies to maintain the health of the fisheries and improve the habitats in these river and lake ecosystems. It is much wiser to base management on peer-reviewed research rather than emotions or which group lobbies the most or loudest or has the most political connections. Thank you for taking the time to hear me out and the many others that have a great love for these fisheries. We are all called to be good stewards of these amazing places and are truly blessed to have them right in our "back yard." So please be wise in your decision making as it will have an impact for years to come and many generations in the future.	3)
Walleye Non-native	As a Missouri River based fishing guide and outfitter, I run a business and hire many independent fishing guides with the focus on flyfishing for wild trout. I fear that altering the focus of our fish populations in this watershed could be catastrophic for our wild trout fishery that is not only a source for recreation for many local and out of area anglers, but also for the livelihoods of hundreds of fishing guides and outfitters like myself.	3)

Walleye Status	Comment	Response
Walleye Non-native	First, I totally support the comments made by MT TU and TU chapters. The acceptance of illegally planted walleye in Canyon Ferry was a sad mistake, and encouraged additional illegal plants. Walleye advocates have told me that both walleye and trout can co-exist, then becoming outraged when I suggested that in fairness if this were to be so in Canyon Ferry, they should pay the extra cost of \$120,000 per year (and rising) of planting trout large enough to survive. The fisheries they threaten bring far more money into the area as renowned trout fisheries, especially the remarkable river area below Holter dam. Walleye clearly are not a native fish and backdoor efforts to gain additional habitat by improperly designating them as such will only add to the damage done to existing successful fisheries.	3)
Walleye Non-native	The management of Walleye below Holter dam needs to remain as is. Adding Walleye as a native fish is a big mistake-they are not native. This section of the Missouri below Holter Dam is a valuable resource for the state and needs to remain a trout fishery. If Walleye's Unlimited had their way Walleye would be in every body of water in the state.	3)
Walleye Non-native	I see no reason to treat walleye other than what they are, an illegally introduced species on our waterways.	3)
Walleye Non-native	I am a sixty year old fisherman. I have been fishing the Holter Lake area and the Missouri River below the lake for about 55 years. In all the years of my youth we just didn't see any walleye. They are clearly not a native fish and the species should be suppressed. It is my humble opinion that the walleye was, more likely than not, introduced to Holter Lake by bucket biologists. The native trout fishery in Holter has been undermined for many years by the introduction of the walleye.	3)
Walleye Non-native	Please do NOT include the walleye as a native Montana fish species as that would do considerable damage to the wonderful trout population we now have on the Missouri River.	3)
Walleye Non-native	I fish the Dearborn which is a tributary of the Missouri below Holter Dam. This is a premier trout fishery. I would hate to see it ruined by allowing walleyes below Holter that would impact the trout in the Dearborn. There are plenty of walleyes in Canyon Ferry, Hauser and Holter already. Don't ruin any more trout waters by allowing the introduction of walleyes.	3)
Walleye Non-native	I am fully opposed to the introduction of any non-native species to any of Montana's waters specifically the Missouri River below Holter Dam. Let me explain my position. For the past 12 years I have made no less than two (2) week long trips per year from PA to Montana and specifically to the famous Missouri River tail-water below Holter Dam to fish for wild trout. In many years I make three (3) trips to the Missouri River below Holter to fish for wild trout. One each trip: 1. I rent a vehicle 2. Buy gas 3. I stay in local hotels 4. I employ local trout guide on each trip 5. Eat in local restaurants 6.	3)

Walleye Status	Comment	Response
	Buy dry goods from local fly shops 7. Buy souvenirs from MT for family members back in PA 8. Bring other people out and we a. Visit other attractions around the state b. Stay in Hotels etc in other parts of the state. Over these many years I believe that I have happily contributed close to a quarter of a million dollars \$\$\$\$ to Montana's economy in an effort to catch the Missouri River's famous "wild trout" and I know that I am not alone. I firmly believe that the Statewide Management Plan & Guide should uphold the current status of walleye as a non-native species in Montana's waterways. I support the peer-reviewed science that guide's the Department's classification of this illegally-introduced species as non-native to Montana. Additionally, I support the full suppression of walleye management in the Missouri River below Holter Dam. People cross continents to fish for wild trout in the Missouri River, and altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to the local economy. Thank you.	
Walleye Non-native	Please do not listen to the loud minority of troglodytes who think that fwp should wave some magic wand and make walleye a "native" fish. These exotic invasives might taste good but for they health of our fisheries there should be a mandatory kill on every walleye caught in Montana.	3)
Walleye Non-native	Walleye are probably not native to Montana. The management plan for the Missouri below Holter should focus on the non-native species that generate tourism and FWP revenue dollars (trout)!	3)
Walleye Non-native	Walleyes are not native fish to Montana! I support peer-reviewed science that guide's the Department's classification of this illegally-introduced species as non-native to Montana. I support full suppression of walleye management in the Missouri River below Holter Dam.	3)
Walleye Non-native	Sirs: I would like to comment on the Statewide Fisheries Management Program and Guide. I'm concerned about the possibility of reclassifying walleye east of the continental divide as a native species. As a retired fisheries biologist for the Wyoming Game and Fish Department, I know that sauger were native in the larger rivers in eastern Montana and Wyoming, but walleye definitely were not native in these streams. As you know, it's important to manage fisheries (as much as possible) based on science rather than whims of the public or political pressure - the long term results will be much better for the fish and general fishing public. Walleye are a great sport fish and wonderful eating, but in Montana, they should be managed as a non-native species, which they are.	3)
Walleye Non-native	If it ain't broke don't fix it. please don't mess with the Walleye status in Missouri River drainage. The Mo is too cool to mess with.	3)

Walleye Status	Comment	Response
Walleye Non-native	Hello. My father has been coming to the Missouri River to fly fish for trout for twenty years. He has shown me what a rewarding sport fly fishing for trout is and I have now been traveling from NY to the Missouri River with him and some friends for the last 5 years. We love the trout fishery. Walleye below the Holter damn will decimate the trout population and change the water forever. We travel to you great state and spend our hard earned money to fish the water we have come to love. Please please please do not allow walleye to become labeled a native species. They absolutely kill trout populations.	3)
Walleye Non-native	No Walleye! The Walleye is a non native species and should be treated as such! The Missouri River is a magnet for the Montana economy. People travel to our state just to enjoy one of the finest trout fisheries in the world. Tourist dollars flow into our state, many because of the magnificent trout fishery the Missouri River offers. Don't be swayed to ruin that by helping the non native Walleye!	3)
Walleye Non-native	I do not support designating walleye a native fish of Montana	3)
Walleye Non-native	Do NOT alter the current management status of walleye in the Missouri below Holter Dam as anything other than ?suppression for this non native species	3)
Walleye Non-native	Walleyes have no place in the Missouri River below Holter Dam. They are a non-native, illegally planted fish that need to stay in the lake. The Missouri is a great trout fishery, LEAVE IT THAT WAY!!!! I drive 7 hours to fish the Missouri. I have friends that come from Chicago. The Missouri is a gold mine for Montana!!!! IT A NO BRAINER, NO WALLEYE IN THE MISSOURI. I read on page 240 of the Montana Management Program & Guide that walleye could have an adverse effect on the trout population in the Missouri River. So you need to follow your Management Program and keep walleyes out of the MO	3)
Walleye Non-native	I hope that FWP does not change to status of Walley from non-native to native in the new management plan. I feel the science clearly states that Walley are not a native species in Montana. They present a risk to the stellar trout fishing in the Missouri River which should be mitigated if at all possible. I think anything other than suppression of Walley in the Missouri river is a mistake and could compromise this valuable resource and its related tourism industry.	3)
Walleye Non-native	I support the science backed mgmt plan that Walleye are a non native species, do not alter the mgmt plan. Fisheries management should be based on science not popular vote. As far as Walleye fishing opportunities should be closer anglers from all over the county and world come to Montana for our trout fisheries. Montana has trout fisheries that are known though out the world, from what I can tell FWP understands their obligation to protect this trout fishery.	3)

Walleye Status	Comment	Response
Walleye Non-native	I do not support making a walleye a native species. Unless I too can be considered a native fish species, my great great grandparents moved to MT in 1906!	3)
Walleye Non-native	I do not support designating walleye as a native fish in Montana on the premise that it is not native. Nor have I spoken to anyone that does support this idea. We hope you won't support it either. Thank you for your time.	3)
Walleye Non-native	I hope the new Statewide Fisheries Management Plan continues to recognize walleye as a non-native species and, therefore, not part of any effort to build populations in Montana lakes and rivers. As a trout fisherman who spends a good deal of time on all of our state's river systems, I appreciate the great work that has been done to build and maintain trout habitat. Walleye introduction would be disastrous to trout populations, for that non-native species does not belong in our river systems where trout thrive	3)
Walleye Non-native	Please uphold the current status of walleye as a non-native species in Montana's waterways, particularly in the Missouri River below Holter Dam. I spend a week every year in Craig, MT fishing for trout in the Missouri and spend at least \$5,000 on guides, lodging and food. I won't visit MT if Walleyes take the place of trout in the Missouri.	3)
Walleye Non-native	In the state wide management plan no changes should take place in the classification of walleye in the Missouri River system below Holter Dam and the suppression classification should remain. Classifying walleye as a native species in this system or any other traditional, native salmonid water ways is gross negligence by Montana Fish Wildlife and Parks and will be met with the full force of the government and law.	3)
Walleye Non-native	Please continue to to classify walleye as a non-native species in Montana's waterways. Specifically, I support current walleye management (full suppression) in the Missouri River below Holter Dam. I travel more than 2,000 miles each year to fish for trout in the Missouri River below Holter Dam because of its world-class trout fishery, and I know I am not the only one. Thank you for all the work you have done in the past to make the Missouri River trout fishery what it is today, and for maintaining its excellence in the future	3)
Walleye Non-native	Please use science-based management in your decision. Walleye are NOT native to this state and should be managed as the invasive species they are. I support the full suppression of walleye in the Missouri River below Holter Dam. We should not risk damaging the magnificent trout fishing on the Missouri. Thank-you	3)

Walleye Status	Comment	Response
Walleye Non-native	I write to comment on one aspect of Montana's Statewide Management Plan & Guide. I would encourage the agency to uphold the current status of walleye as a non-native species in our waterways. Any decision to reclassify a species as "native" must be based on the best available science and not political or social factors. Walleye may be enjoyable to fish for in certain areas, but this does not change the fact that the species was illegally-introduced and is not native to Montana. Walleye should continue to be suppressed and aggressively managed in the Missouri River below Holter Dam. The agency is well aware of the potential impacts to the trout fishery, and this is reason enough to reject any proposal to reclassify walleye as a competing species.	3)
Walleye Non-native	I encourage you to hold the current status of Walleye as an invasive species. Amending the current plan on the Missouri above Holter to favor Walleye is not going to help improve satisfaction of walleye or any other anglers for that matter. Instead I think that an effort to better educate walleye anglers on the great fishing elsewhere in the state would be a better option rather than favor one fishery i.e walleye at the detriment of the trout fishery. Furthermore, the upper missouri river watershed was never intended to sustain or provided troph walleye fishing. While I understand that having to travel to considerable distance to your favorite fishery is an inconvenience that reason alone should not affect decisions to alter or harm other world class fisheries like trout fishing. Living in eastern MT provides some of the best fishing in the world. However, I prefer and love trout fishing and travel frequently to the Missouri for it. However you won't me petition FWP petition for a trout fishery here because I know it doesn't biologically makes sense just like walleye in the mountains doesn't.	3)
Walleye Non-native	Keep Walleye as a non-native. The trout fishing of the Missouri River drainages are unique to Montana, and a place people go from all over to fish for the amazing trout that call that home	3)
Walleye Non-native	As a long time angler from the Helena area, I have witnessed the importance of our world class fisheries throughout the state. Specifically the Missouri River provides Montanans and out of state visitors the opportunity for tremendous unrivaled trout fishing. However, the management of the upstream reservoirs as "multi-species" waters have put the Missouri below Holter Dam at significant risk. The Statewide Management Plan & Guide should uphold the current status of walleye as a non-native species in Montana's waterways. I support the peer-reviewed science that guide's the Department's classification of this illegally-introduced species as non-native to Montana. Additionally, I support the full suppression of walleye management in the Missouri River below Holter Dam. People cross continents to fish for wild trout in the Missouri River, and altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to our local economy.	3)



Walleye Status	Comment	Response
Walleye Non-native	I am 100% against declaring walleye a native fish in the Missouri. This would be a disaster for the world famous trout fishing and the huge economic driver	3)
Walleye Non-native	Please continue to manage Montana's fisheries using science and fact base principals and do not "naturalize" Walleye as a native fish in the Missouri below Holter Dam. Continue to manage as "suppression"	3)
Walleye Non-native	I absolutely oppose any initiative that would grant walleyes status as a native fish. These walleye supporters are the same group that promised that a walleye hatchery would not cost FWP anything. How did that work out? The Missouri below Holter is a world class destination for trout fisherfolks, not walleye fishers.	3)
Walleye Non-native	The Statewide Management plan and guide should uphold the current status of walleye as a non native species in Montana. Walleye were illegally introduced to Montana and do great harm to native fish populations. Walleye populations below Holter dam should be suppressed.	3)
Walleye Non-native	Illegally introduced walleyes have been deemed non-native to the Upper Missouri Watershed. Please continue the policy of suppression within the Missouri River below Holter Dam. As a frequent angler, property owner, and taxpayer on the Missouri River this is an especially important issue to me.	3)
Walleye Non-native	Walleye from historical records are non-native. Saucer yes walleye NO!	3)
Walleye Non-native	I am against the bad science that considers walleye a native species east of the divide. They are invasive and should be given no special consideration	3)
Walleye Non-native	Please suppress walleye populations below Holter dam. They should be considered a non-native fish.	3)
Walleye Non-native	The walleye is an invasive species. Do NOT manage it as anything else. Trout fishing will be harmed in the Missouri system and that is something people come from all over the world to fish for. People do not come from all over the world to fish for walleye. Those that prefer fishing for walleye can drive a little ways for bigger walleye if they so choose. Please, the Mo is too precious as a resource.	3)
Walleye Non-native	No walleye in non native areas please, Missouri River around Craig needs to NOT be designated as a NATIVE area for these fish	3)

Walleye Status	Comment	Response
Walleye Non-native	As a landowner for 30 years of Missouri riverfront property, I am discouraged that the proposed fisheries statement to manage Walleye below Holter Dam as a native species is even being considered on this blue ribbon trout fishery- this section is a world class trout fishery that attracts visitors from all over the world - I doubt a Walkeye fishery will do the same!	3)
Walleye Non-native	I urge you NOT to recognize walleye as a native species in Montana. There is no reliable science indicting this and a decision in favor of it will be wrong-headed and unsupportable.	3)
Walleye Non-native	The Missouri from Holter Dam to Cascade offers some of the finest trout fishing Montana has to offer. Please continue to manage this stretch of river for high-quality trout fishing. Please continue management to suppress walleye in this stretch of the Missouri, which I refer to as the "Holy Water." Walleye have a place in Montana, but they're not native--despite calls to have them managed as a native species.	3)
Walleye Non-native	Walleye should not be recognized as a native fish east of the divide. Historical and scientific evidence of their existence in Montana is sketchy at best. FWP should not reward an illegally introduced fish as native. It only leads to more illegally introduced fish. Thank you for your time.	3)
Walleye Non-native	Do not list walleye as a native fish in the Missouri River basin. If they aren't truly native, don't treat and fund them as native. It's the same situation with rainbows and browns.	3)
Walleye Non-native	As a lifelong Montana resident, fisherman and guide I strongly encourage FWP to carefully consider changing the status of Walleye as a non-native species. I strongly support peer-reviewed science guiding FWP's classification of Walleye. This species is an illegally introduced, non-native predator. I ask the Department to consider not only the ecological damage that species revision would cause, but also the precedent it would set. If an illegally introduced species is allowed to be reclassified, the slippery slope it would set will lead to a perpetual fight to change Montana's waterways and fisheries to support charismatic and sought after game fish, regardless of their history or place within the ecosystem which is no way to manage a resource. To reclassify an illegally introduced fish will only embolden future "bucket biologists", and what does it say about the Departments respect for rule of law and science. Please allow science and history to lead this decision, not a handful of passionate Walleye fanatics, after all, these fish are non native and ILLEGALLY introduced. To consider this is an affront to sound fisheries management and a slap in the face to those of us that fight to end illegal introductions.	3)

Walleye Status	Comment	Response
Walleye Non-native	Walleye are not native fish. This we know. Walleye need to be suppressed, not managed as a game fish. The illegal introductions and bucket biology that are rampant cannot be condoned. The Statewide Management Plan & Guide should continue to uphold science over politics and recognize what we have long known to be truth - walleye are a non-native species in Montana's waterways. Let's stick with the scientific method and let peer-reviewed science guide the Department's classification of this illegally-introduced species. We cannot condone bucket biology. It was a mistake to do so at Canyon Ferry and is certainly a mistake to do the same here. Walley do not belong below Holter Dam. There are plenty of places to catch Walleye. But our economy depends upon the world class trout fishery on the Missouri. While we have altered the fishery from native to native/wild, let's not make it worse. Thank you	3)
Walleye Non-native	I urge your agency to continue suppressive policies and practices regarding ANY animal or plant species which science has shown to not naturally occur in any Montanan waters. A walleye, for example, is out of it's natural range if the species was not present until recent historic past. No different than Quagga mussels.	3)
Walleye Non-native	Walleye are not a native species to Montana and should be managed as invasive in the Holder Dam area and throughout Montana's waters. The Management Program and Guide should strongly attest to control of walleye as nonnative. Walleye, smallmouth bass, pike, and other nonnative predators must be managed as invasive species that threaten native trout, whitefish and minnows.	3)
Walleye Non-native	Considering the walleye a native species is a slap in the face of scientific management of our natural resources. Walleye are not native to this state and the designation of native species should never be a political decision. I encourage you to continue to institute full suppression measures for walleye in the Upper Missouri and protect our world-famous trout fishery. Montana will never be a destination walleye fishery, but we already have millions of dollars coming into our state every year for this fishery. Please do the right thing and follow the path of reason and science.	3)
Walleye Non-native	I very much am in favor of total suppression of walleye below Holter Dam. As someone who has fished for trout since the early 60's here in MT it has been very frustrating for me to see the constant encroachment of the warm water non native walleye gain a hold in so many of our MT waters! Please don't allow continued expansion of this non native warm water fish. Thank you	3)
Walleye Non-native	I do not support any motions laws or efforts to classify a walleye as a species that is native to Montana and it's waterways. This fish is not indigenous and should not be given any preferential treatment, or otherwise be encouraged as part of the greater ecosystem of Montana fisheries.	3)

Walleye Status	Comment	Response
Walleye Non-native	I don't know much about that area, but I do know that Walleye are an invasive fish that hold no value for our future of native fish... yikes!	3)
Walleye Non-native	Please, let us remember and remind ourselves that walleye are non-native fish that will wreck havoc on native trout in the Missouri. Save the Missouri trout and keep walleye out.	3)
Walleye Non-native	1) It [native walleye] simply is not true. Finding one scientific article out of Canada that shows a potential distribution map of walleye AND sauger east of the continental divide does not suffice to dispute decades of peer-reviewed science. Sure, I can find 3% of the world's climatologists that say climate change isn't caused by humans, but that doesn't discount the other 97%. Please prioritize the biological science over social science in this matter.	3)
Walleye Non-native	Hello, as an avid fisherman and long time Montana resident I wish to express my opinion about the Walleye fish that reside East of the Continental Divide. These fish are not natives and should never be treated as such. Period. They are fun to catch, they are tasty, they are not a native fish to our fisheries here in Montana!	3)
Walleye Non-native	Walleyes are not or ever have been native to Montana. And current populations that have been established from illegal introductions should not be conservational managed	3)
Walleye Non-native	I am in favor of keeping this no limit for walleye. Even if I were not a trout fisherman, I would be in favor of keeping this no limit on walleye, because this is one of the streams in the state that garners the most revenue for the state - and it is not because of walleye fishing. I fish this section of the river many times during the year, and I have yet to find anyone who travels from a long distance and spends money in our economy to fish this section for walleye. It makes no economic sense to manage this section for walleye. Walleye are not a native fish in this section of the Missouri and should never be classified as such.	3)
Walleye Non-native	Anything other than full suppression of walleye below Holter Dam is crazy. Why risk the multi-million dollar fly fishing industry below Holter Dam so a few natty light drinking walleye anglers can have some beer battered fish tacos and leave a bunch of Styrofoam along the river? All the peer reviewed science points to walleye as non native and illegally introduced in this section of the Missouri. By all rights, walleye shouldn't even be in the reservoir system above Holter Dam. Please follow good science, as you have, and continue to manage walleye with FULL SUPPRESSION below Holter Dam. The multi million dollar trout fishery below Holter Dam depends on FWP continuing to manage the Missouri as a world class trout fishery. Thank you	3)

Walleye Status	Comment	Response
Walleye Non-native	Walleye is not native and should never be classified as so. We do not want to risk the chance of losing or lowering the Trout population and if Walleye is classified as native it is a definite possibility. Please do not classify Walleye as native.	3)
Walleye Non-native	I also understand that a proposal has been made to declare walleye a “native” Montana fish. It would be unconscionable to seriously consider such a move. Declaring a fish a native does not make it one. Walleye are non-native to Montana and have been both legally and illegally introduced into Montana waters. The illegal introduction of the apex predator has been devastating to our native trout species, particularly westslope cutthroat trout and bull trout. In waters where walleyes have been illegally introduced and those two native species are found the natives have suffered. Case in point, Noxon reservoir. Now walleyes are showing up in Lake Pond Oreille, Idaho. Simple logic would point to those fish having migrated downstream from Noxon. One illegal introduction has led to the decimation of Montana natives in those waters and now threatens another state.	3)
Walleye Non-native	We are aware that walleye proponents are again trying to get walleye declared a native species in Montana. This plan failed in the Legislature in 2009 and has always been a silly idea. There is no science showing that walleye occupied Montana waters prior to European settlement and none of the arguments by walleye proponents use viable scientific evidence. They are not a Montana native fish and to declare native species by popular fiat is not the way the Department operates. FVTU continues to vehemently oppose any legal or illegal expansion of walleye west of the Continental Divide and any attempt to dictate native species solely in order to change management options.	3)
Walleye Non-native	I agree with MFWP's classification of walleye as a non-native species in Montana based on peer-reviewed science. Furthermore, I support the SMPG's balanced approach to managing walleye as a non-native species that both provides desired recreational harvest opportunities as well as constitutes a threat to established high-value salmonid and non-salmonid fisheries. I believe the Department must continue to emphasize the wild trout fishery of the Missouri River from Holter Dam to Cascade and take appropriate actions to suppress walleye populations whenever necessary to protect the multi-million dollar economic benefits of the rainbow/brown trout fishery that exists there.	3)

**FWP Response to Comments on Walleye Status**

Comment Number	Comment Response
1)	FWP presented its results from the evaluation of Walleye native range at the Montana Chapter of the American Fisheries Society on February 1 and at a public meeting in Helena on February 28. The intent of both meetings was to solicit input from peers and the public to look for additional information for FWP to consider regarding this topic. FWP's presentation from both meetings has been shared throughout professional organizations and with the public and to date there has been no additional information to refute FWP's stance.
2)	If Walleye were classified as native, the indigenous range would need to be identified and priorities established within that range. FWP would also need to develop strategies to identify conservation need within indigenous range and determine appropriate management action. Walleye management outside of native range would also need to be considered. The Walleye stocking program would need to be evaluated to ensure genetic integrity of native Walleye stocks. Population suppression would still be a viable management tool but could become more widespread outside of native range in order to preserve genetic stocks.
3)	Following the December commission meeting, Fisheries staff conducted a comprehensive review of available information to evaluate the status of Walleye in Montana. After literature review and consultation with professionals across North America FWP determined that a change in Walleye status is not warranted. A summary of this analysis has been provided to the commission in a separate package.
4)	Walleye are recognized as an important game fish in Montana and are managed as such in many waterbodies.

**Missouri River Walleye Management**

Management strategies for walleye management for the Missouri River below Holter Dam collected 227 comments. Comments on this topic were focused on eliminating the current “no limit” regulation on walleye in this river section or to maintain the current status to maximize suppression of walleye.

MO River Walleye	Comment	Response
	4. Get rid of the "no limit" on walleye below Holter. It is not justified and effectively creates a no possession limit in central Montana and makes other limits unenforceable.	1), 2)

	<p>As one of Montana’s most productive cold-water trout fisheries, we think it is of the utmost importance to protect this fishery and maintain a policy of walleye suppression below Holter Dam. As you are likely aware, Walleyes Unlimited is advocating for changes to suppression regulations of walleye in this reach of the Missouri River. Pat Barnes Trout Unlimited supports nothing less than a full suppression management plan for walleye, with the goal of maintaining the highly productive trout fishery that is currently available to anglers.</p>	1)
	<p>MTU strongly endorses maintaining unlimited harvest for walleyes between Holter Dam and Cascade. This regulation makes sense for several reasons: 1.) it helps reduce the risk of increasing walleye predation on salmonids in this reach; 2.) it serves as a potential control for the walleye population that has been allowed to flourish in Canyon Ferry Reservoir and then move downstream into the river; and, 3.) it unequivocally states that the primary fishery management objective of FWP for the river fishery between Holter Dam and Cascade is to maintain a world-class wild trout population</p>	1), 3)
	<p><b><i>There were 114 comments provided that included this comment:</i></b>“The Statewide Management Plan &amp; Guide should uphold the current status of walleye as a non-native species in Montana’s waterways. I support the peer-reviewed science that guide’s the Department’s classification of this illegally-introduced species as non-native to Montana. Additionally, I support the full suppression of walleye management in the Missouri River below Holter Dam. People cross continents to fish for wild trout in the Missouri River, and altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to our local economy.”</p>	1), 3)
	<p>SMTU strongly endorses maintaining unlimited harvest for walleyes between Holter Dam and Cascade.</p>	1)
	<p>As a Missouri River based fishing guide and outfitter, I run a business and hire many independent fishing guides with the focus on flyfishing for wild trout. I fear that altering the focus of our fish populations in this watershed could be catastrophic for our wild trout fishery that is not only a source for recreation for many local and out of area anglers, but also for the livelihoods of hundreds of fishing guides and outfitters like myself.</p>	1), 3)
	<p>First, I totally support the comments made by MT TU and TU chapters. The acceptance of illegally planted walleye in Canyon Ferry was a sad mistake, and encouraged additional illegal plants. Walleye advocates have told me that both walleye and trout can co-exist, then becoming outraged when I suggested that in fairness if this were to be so in Canyon Ferry, they should pay the extra cost of \$120,000 per year (and rising) of planting trout large enough to survive. The fisheries they threaten bring far more money into the area as renowned trout fisheries, especially the remarkable river area below Holter dam. Walleye clearly are not a native fish and backdoor efforts to gain additional habitat</p>	3)

	by improperly designating them as such will only add to the damage done to existing successful fisheries.	
	The management of Walleye below Holter dam needs to remain as is. Adding Walleye as a native fish is a big mistake-they are not native. This section of the Missouri below Holter Dam is a valuable resource for the state and needs to remain a trout fishery. If Walleye's Unlimited had their way Walleye would be in every body of water in the state.	1), 3)
	Please maintain walleye suppression from Holter to Cascade to ensure the world class quality Trout fishing the Missouri currently provides. The Missouri River gives back to the state of MT economically due to high number anglers traveling to the incredible fishery. These folks support tourism dollars by spending on outfitters, gas lodging, retail, food and anything else thy might need on their trip. Thanks!	1), 3)
	I am a sixty year old fisherman. I have been fishing the Holter Lake area and the Missouri River below the lake for about 55 years. In all the years of my youth we just didn't see any walleye. They are clearly not a native fish and the species should be suppressed. It is my humble opinion that the walleye was, more likely than not, introduced to Holter Lake by bucket biologists. The native trout fishery in Holter has been undermined for many years by the introduction of the walleye.	1), 3), 4)
	I fish the Dearborn which is a tributary of the Missouri below Holter Dam. This is a premier trout fishery. I would hate to see it ruined by allowing walleyes below Holter that would impact the trout in the Dearborn. There are plenty of walleyes in Canyon Ferry, Hauser and Holter already. Don't ruin any more trout waters by allowing the introduction of walleyes.	3)
	As a person who travels several times a year to fish for trout in Montana, I support your current policy to suppress walleye populations in the Missouri River in the region about and above Holter Dam. My understanding is, walleye are an invasive species to the 'upper' Missouri River and are a predator to small trout.	1), 3)
	keep the walleye out of the MO	1)



	<p>The Missouri River is a world class trout fishery. I fly out from Pennsylvania for the privilege of fishing your beautiful river. It would be a shame to ruin a great trout fishery to promote walleye. There are great places to pursue walleye. The Missouri is special as is. Let's protect it.</p>	3)
	<p>Hi. I Travel from Calgary, Alberta to fly fish on the Missouri below Holter dam three trips a year. Each trip I bring two friends and spend about \$1,000/person. THAY ADDS UP TO APPROXIMATELY \$9,000/YEAR. You currently have a fantastic trout fishery below Holter Dam. It has been that way since I first visited the Missouri in 1986. Please don't jeopardize the trout fishery with any Walleye enhancement program.</p>	3)
	<p>6. Part II -d Upper Missouri Holter to Cascade bridge. Walleye should b e managed as a native species and proper slot limits should be in place. Management of this section has been based on economics and not biological date. Your own data shows not effect on trout who are a non native fish anyway. Note Many trout guides now fish for walleye for themselves and some for clients.</p>	1), 3)
	<p>I am fully opposed to the introduction of any non-native species to any of Montana's waters specifically the Missouri River below Holter Dam. Let me explain my position. For the past 12 years I have made no less than two (2) week long trips per year from PA to Montana and specifically to the famous Missouri River tail-water below Holter Dam to fish for wild trout. In many years I make three (3) trips to the Missouri River below Holter to fish for wild trout. One each trip: 1. I rent a vehicle 2. Buy gas 3. I stay in local hotels 4. I employee local trout guide on each trip 5. Eat in local restaurants 6. Buy dry goods from local fly shops 7. Buy souvenirs from MT for family members back in PA 8. Bring other people out and we a. Visit other attractions around the state b. Stay in Hotels etc in other parts of the state. Over these many years I believe that I have happily contributed close to a quarter of a million dollars \$\$\$\$ to Montana's economy in an effort to catch the Missouri River's famous "wild trout" and I know that I am not alone.</p>	1), 3)
	<p>Please do not alter the current management status of walleye in the Missouri River below Holter Dam other than suppression.</p>	1)
	<p>I believe the native walleye should get more support in the Missouri River system especially in holter lake and river below the dam. Too much focus is on trout. We should be working to create fisheries that support both fish.</p>	3)
	<p>Please do not change walleye management below Holter Dam. The trout fishing is excellent and managing walleye differently could jeopardize that.</p>	3)

	Please, please carefully weight the consequences of releasing this invasive species into a river that is not only a cornerstone of Montana recreation but is a fishery that boosts the economy to surrounding communities. It is completely unnecessary to consider allowing these fish into the river beneath the dam due to the fact that once released could have irrevocable and unsavory results. Pleae keep our resources as much intact as possible and prevent the release of anymore invasive species. Thanks for your consideration.	3)
	Do not encourage more Walleye below Holter Dam. You will ruin the best Trout fishing in Montana	3)
	Walleye are probably not native to Montana. The management plan for the Missouri below Holter should focus on the non-native species that generate tourism and FWP revenue dollars (trout)!	3)
	Walleyes are not native fish to Montana! I support peer-reviewed science that guide's the Department's classification of this illegally-introduced species as non-native to Montana. I support full suppression of walleye management in the Missouri River below Holter Dam.	1), 3)
	regarding planting and regulating walleye in the Missouri river. The Missouri below Hauser and Holter is a trout fishers heaven. Turning it over to the walleye fishers would destroy the best fishing experience in the state. People don't come to montana to fish for walleye. There is too many walleye already in the lakes. Add the walleye fishers to the river and look at the congestion on an alredy over crowed river. Leave it alone please.	3)
	please do not change current management of walleyes on the Missouri river systems. we do not need more walleye eating our trout fry on a blue ribbon fishery. thank you	3)
	The new scientific information on the range of Walleye, showing that they are native East of the continental divide in Montana, needs to be addressed before the state management plan can be approved. This plan needs to be put on hold until the native status of walleye is determined. Also the management goals bellow Holter Dam need to be based on science not politics	1), 3)
	Please keep the regulations as they are. There are tons of places to fish for walleye but only a scant few rivers were wild trout are available.	1), 3)
	Please do not allow the introduction or furthering of the walleye population on the MissouriRiver specifically that area below Holter Dam	3)

	<b><i>There were 2 comments provided that included this comment:</i></b> Hello. My father has been coming to the Missouri River to fly fish for trout for twenty years. He has shown me what a rewarding sport fly fishing for trout is and I have now been traveling from NY to the Missouri River with him and some friends for the last 5 years. We love the trout fishery. Walleye below the Holter damn will decimate the trout population and change the water forever. We travel to you great state and spend our hard earned money to fish the water we have come to love. Please please please do not allow walleye to become labeled a native species. They absolutely kill trout populations.	3)
	No walleye below Holter dam! Keep them in the lake where they belong! Lots of people depend on the trout fishing below Holter to make a living!	3)
	No walleye below Holter Dam! The Missouri below Holter is one of the greatest wild trout fisheries on earth and brings millions into the local economy! Keep the walleye in the lakes above!	3)
	I've been fishing the Missouri river between Holter Dam and Cascade for almost 30 years. I drive down from Bigfork on a regular basis to fly fish the river for trout. Altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to the local economy	1), 3)
	Please support the peer-reviewed science that supports keeping Walleye above Holter dam! Keep the wonderful Trout habitat safe from this predator!!	3)
	No Walleye! The Walleye is a non native species and should be treated as such! The Missouri River is a magnet for the Montana economy. People travel to our state just to enjoy one of the finest trout fisheries in the world. Tourist dollars flow into our state, many because of the magnificent trout fishery the Missouri River offers. Don't be swayed to ruin that by helping the non native Walleye!	3)
	Please do NOT alter current fish practices below Holter Dam. It is a unique, world class fishery visited by Anglers from around the globe. I live in Seattle and fish a week in the spring and fall every season. The idea of increasing non native walleye in the 35/40 miles of prime trout water below Holter Dam is ludicrous. It would be an ecological nightmare.	1), 3)
	No walleye in the Missouri drainage that would diminish the trout below Holter dam	3)
	Do NOT alter the current management status of walleye in the Missouri below Holter Dam as anything other than ?suppression for this non native species	1), 3)

	As a trout fisherman and Helena resident I urge the Montana FWP to maintain the current Walleye management strategy of "suppression" in the waters of the Missouri river downstream from Holter dam. Keep the Walley in the lakes where they belong and out of Montana's blue ribbon trout rivers.	1), 3)
	Missouri River - Dearborn Drainage : Page 245. Missouri River - Holter Dam to Cascade Bridge. The harvest limit for walleye should be the same as Holter reservoir. Currently the "No Limit" on walleye is just wrong.	1), 5)
	The Missouri River is a Blue Ribbon trout stream one of the best in North America. It needs to be a Trout River first and foremost, not a walleye River	3)
	I travel from Chicago to flyfish for trout in the great state of Montana. When I fish for large walleye I go to Minnesota. Your plan to stock walleye which would compete with the beautiful trout in your rivers Holton Dam on the Missouri would definitely impact my fishing plans.	3), 6)
	Please do not interfere and add walleyes to a wonderful trout environment like our MO above or below holter dam	3)
	This is regarding the current management plan for the Missouri below Holter dam. You guys really need to suppress the walleye because they are just like pike and they will win everytime... As you know the walleye go after the roe just as much as the fingerlings which makes this a double threat... They are not native to the area and they are not sought after nearly as trout. This debate is dangerous and Montanans waterways are seriously under threat from warm water species especially pike and walleye. The Missouri waterways alone plus waterways across the state are plagued by pike and there has been a decline in the trout fishing especially in the Clark Fork due to this being one of the factors. Please do not destroy the Missouri due to politics and popularity. This beautiful fishery and the people who call it home and make a living from it. Thank you	1), 3)
	First: The Missouri Below Holter draws anglers from around the world who are interested in catching trout. Any changes to the management plan, including changes to catch limits for walleye or other warm water species below Holter Dam, that may negatively affect the trout fishery, need to be fully vetted.	1), 3)
	Walleyes have no place in the Missouri River below Holter Dam. They are a non-native, illegally planted fish that need to stay in the lake. The Missouri is a great trout fishery, LEAVE IT THAT WAY!!!! I drive 7 hours to fish the Missouri. I have friends that come from Chicago. The Missouri is a gold mine for Montana!!!! IT A NO BRAINER, NO WALLEYE IN THE MISSOURI. I read on page 240 of the Montana Management Program & Guide that walleye could have an adverse effect on the trout population in	1), 3), 4)

<p>the Missouri River. So you need to follow your Management Program and keep walleyes out of the MO</p>	
<p>Please keep the Missouri River below Holter Dam a trout fishery. No more walleye</p>	<p>3)</p>
<p>Please uphold the the current status of walleye in the Missouri river below Holter Dam, they were illegally-introduced are not native and should be managed under "suppression" only guidelines</p>	<p>1), 4)</p>
<p>I hope that FWP does not change to status of Walley from non-native to native in the new management plan. I feel the science clearly states that Walley are not a native species in Montana. They present a risk to the stellar trout fishing in the Missouri River which should be mitigated if at all possible. I think anything other than suppression of Walley in the Missouri river is a mistake and could compromise this valuable resource and its related tourism industry.</p>	<p>3)</p>
<p>I support the science backed mgmt plan that Walleye are a non native species, do not alter the mgmt plan. Fisheries management should be based on science not popular vote. As far as Walleye fishing opportunities should be closer anglers from all over the county and world come to Montana for our trout fisheries. Montana has trout fisheries that are known though out the world, from what I can tell FWP understands their obligation to protect this trout fishery.</p>	<p>3)</p>
<p>Hello, I am contacting you in concern of Walleye Management on the Missouri River and in Montana. Please suppress walleye on the Missouri River and every other river in Montana. People travel form all over the world, the country and Montana to fish the world class trout fishery that is the Missouri River. Millions and millions of dollars are brought to this state and countless people make their livings fishing these sections of river. I am on a river approx 250 days a year and it is very rare that I see a walleye Angler on the river. Thank You</p>	<p>1), 3), 4)</p>
<p>Please uphold the current status of walleye as a non-native species in Montana?s waterways, particularly in the Missouri River below Holter Dam. I spend a week every year in Craig, MT fishing for trout in the Missouri and spend at least \$5,000 on guides, lodging and food. I won't visit MT if Walleyes take the place of trout in the Missouri.</p>	<p>3)</p>
<p>In the state wide management plan no changes should take place in the classification of walleye in the Missouri River system below Holter Dam and the suppression classification should remain. Classifying walleye as a native species in this system or any other traditional,native salmonid water ways is gross negligence by Montana Fish Wildlife and Parks and will be met with the full force of the government and law</p>	<p>1), 3)</p>

	There are plenty of places to fish for walleye. Please leave the Missouri River from Holster Dam to Great Falls a trout fishery	3)
	I travel to Montana every year ( twice last year ) from New England to fish the Mo for trout. I spend about 2or 3k \$ while in Montana for each trip.I have a couple of friends who do the same. No way am I going to travel to Montana for walleye Don't ruin what you have. Think about the people who thought it was a great idea to introduce Lake Trout into Yellowstone. How did that work out???	1), 3), 4)
	1. Do not change to the management of the Missouri river trout fishery below Holter dam regarding Walleye. Preserve the fishery regulations in order to maintain the sport and economic benefits this area provides by attracting trout anglers from Montana and across the country.	1), 3)
	I am writing to inform you that I am strongly opposed to any action that increases the population of Walleye in the Missouri River below Holter dam. This section of the Missouri River from Holter dam to Cascade is the best trout fishery in Montana To reach another trout fishery of this quality would repuire significant travel from the local area. Walleye fisherman have plenty of other opportunities in the area to catch Walleye without messing things up for Trout fisherman. The only other Trout fishery close to the quality of the Missouri in the state would be the Bighorn River and that would take a half day just to get to from Great Falls or Helena. People come from all over Montana to fish the Missouri it doesn't make sense to ruin it when there are so many other places already available for Walleye fishing	3)
	I travel from Chicago to dry fly fish on the Missouri River which is quite a unique experience rarely matched by most other rivers. Any policy which alters this unusual day will significantly change my plans to visit the great state of Montana which provides the best trout fishing in the world THANK YOU	3)
	Please continue to use science based approaches for managing our fisheries. Suppression of walleye below Holter Dam on the Missouri is responsible management. There are plenty of other quality walleye fisheries in Montana, but the Missouri is a unique trout fishery prized the world over.	1), 3)
	The push for increased walleye habitat and numbers is very damaging to the future of the NATIVE trout population in our Montana waters. I have fly fished as a Montanan on the Missouri River since 1974 when Walleye fisherman were unheard of. There numbers have increased and through their bucket stocking program and rabid methods, I am reminded of the anti-gun movement that has increased over the years. We must not allow the management of the Missouri below Holter Dam to change. The Missouri River is our treasure and we must not allow the walleye pirates to steal our treasure. Thanks	1), 3), 7)

	<p>Please continue to to classify walleye as a non-native species in Montana's waterways. Specifically, I support current walleye management (full suppression) in the Missouri River below Holter Dam. I travel more than 2,000 miles each year to fish for trout in the Missouri River below Holter Dam because of its world-class trout fishery, and I know I am not the only one. Thank you for all the work you have done in the past to make the Missouri River trout fishery what it is today, and for maintaining its excellence in the future</p>	<p>1), 3)</p>
	<p>After review of the Management Program for this section of river, I would encourage the state to continue with the high harvest levels for the Walleye species. As you are fully aware the Walleye is a predator to the Rainbow and Brown trout. The reason that the Missouri River is considered a "Blue Water" is because of these trout. Should the Walleye not remain within reasonable numbers within this river the impact to the trout and the economy could be devastating. In addition, there are other areas within the state that the Walleye species can thrive without impacting the wild trout or causing economic hardship to the Missouri River region</p>	<p>1), 3)</p>
	<p>Please use science-based management in your decision. Walleye are NOT native to this state and should be managed as the invasive species they are. I support the full suppression of walleye in the Missouri River below Holter Dam. We should not risk damaging the magnificent trout fishing on the Missouri. Thank-you</p>	<p>1), 3), 4)</p>
	<p>The Missouri below Holter does not need walleye fishing , it is world class as it is . Well managed by FWP</p>	<p>3)</p>
	<p>I write to comment on one aspect of Montana's Statewide Management Plan &amp; Guide. I would encourage the agency to uphold the current status of walleye as a non-native species in our waterways. Any decision to reclassify a species as "native" must be based on the best available science and not political or social factors. Walleye may be enjoyable to fish for in certain areas, but this does not change the fact that the species was illegally-introduced and is not native to Montana. Walleye should continue to be suppressed and aggressively managed in the Missouri River below Holter Dam. The agency is well aware of the potential impacts to the trout fishery, and this is reason enough to reject any proposal to reclassify walleye as a competing species.</p>	<p>1), 4)</p>
	<p>i travel from western Washington State to trout fish the Missouri River below Holter Dam. Please, do not alter the current management status of walleye in the Missouri below Holter Dam as anything other than ?suppression?.</p>	<p>1)</p>

	<p>I encourage you to hold the current status of Walleye as an invasive species. Amending the current plan on the Missouri above Holter to favor Walleye is not going to help improve satisfaction of walleye or any other anglers for that matter. Instead I think that an effort to better educate walleye anglers on the great fishing elsewhere in the state would be a better option rather than favor one fishery i.e walleye at the detriment of the trout fishery. Furthermore, the upper missouri river watershed was never intended to sustain or provided troph walleye fishing. While I understand that having to travel to considerable distance to your favorite fishery is an inconvenience that reason alone should not affect decisions to alter or harm other world class fisheries like trout fishing. Living in eastern MT provides some of the best fishing in the world. However, I prefer and love trout fishing and travel frequently to the Missouri for it. However you won't me petition FWP petition for a trout fishery here because I know it doesn't biologically makes sense just like walleye in the mountains doesn't.</p>	3), 8)
	<p>As a long time angler from the Helena area, I have witnessed the importance of our world class fisheries throughout the state. Specifically the Missouri River provides Montanans and out of state visitors the opportunity for tremendous unrivaled trout fishing. However, the management of the upstream reservoirs as "multi-species" waters have put the Missouri below Holter Dam at significant risk.</p>	1), 3)
	<p>I support the full suppression of walleye management in the Missouri River below Holter Dam. I come to fish the Missouri from out-of-state 2-3 times per year, as I know many other anglers do from across the country and the globe, and I feel any negative impact to the trout fishery on the Missouri would harm the health of the river, and the local economy</p>	1), 3)
	<p>Peer-reviewed science is worth trusting. I have spent tourist dollars visiting Craig for the last 6 years. I became a Montana land owner because of the excellent management of trout waters. I am building a home in Montana because of trout. The work you do to protect trout waters is critical - thank you!!!</p>	1), 3)
	<p>The Statewide Management plan and guide should uphold the current status of walleye as a non native species in Montana. Walleye were illegally introduced to Montana and do great harm to native fish populations. Walleye populations below Holter dam should be suppressed.</p>	1), 4)
	<p>Illegally introduced walleyes have been deemed non-native to the Upper Missouri Watershed. Please continue the policy of suppression within the Missouri River below Holter Dam. As a frequent angler, property owner, and taxpayer on the Missouri River this is an especially important issue to me.</p>	1), 4)



<p>I'm writing to support the current management of "suppression" for walleye on the Missouri River below Holter Dam. The Missouri River trout fishery below Holter Dam is a true gem that we as Montanans should fight to preserve. It would be a tragedy to upset the balance on this section of the Missouri River. People travel from far and wide to fish this section of the Missouri River because of the healthy population of wild trout. FWP has done a wonderful job managing this fishery. Keep up the great work and maintain the focus on preserving this section of the Missouri River as a world class trout fishery.</p>	<p>1), 3)</p>
<p>Please do not to alter the current management status of walleye in the Missouri below Holter Dam as anything other than ?suppression.</p>	<p>1)</p>
<p>Please not to alter the current management status of walleye in the Missouri below Holter Dam as anything other than ?suppression.....the Missouri River maybe the the "finest trout fishery in the world"..altering that resource would border on criminal...I'am from Penna and I spend 2 months on the river in Craig every year since 1990 and I contribute over \$10.000 dollars to the local community</p>	<p>1), 3)</p>
<p>Please suppress walleye populations below Holter dam. They should be considered a non-native fish.</p>	<p>1)</p>
<p>The walleye is an invasive species. Do NOT manage it as anything else. Trout fishing will be harmed in the Missouri system and that is something people come from all over the world to fish for. People do not come from all over the world to fish for walleye. Those that prefer fishing for walleye can drive a little ways for bigger walleye if they so choose. Please, the Mo is too precious as a resource.</p>	<p>3)</p>
<p>No walleye in non native areas please, Missouri River around Craig needs to NOT be designated as a NATIVE area for these fish</p>	<p>3), 7)</p>
<p>People cross continents to fish for wild trout in the Missouri River, and altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to our local economy including me, from Atlanta Georgia, each year. My friends and I spend thousands of dollars each year in the Craig Montana area on guides, equipment, lodging and meals. In the summer of 2019, I will spend over a month in Craig in July and August, spending well over \$10,000 to do so on lodging and guides. Should the fishing on the MO decline due to increased populations of walleye, I will travel to another area to trout fish. The MO is a unique trout fishery. Efforts should be made to keep it that way. Conversely, it would make no more sense to try to establish a brown trout dry fly fishery in Ft. Peck reservoir by dumping brown trout in there.</p>	<p>1), 3)</p>
<p>As a landowner for 30 years of Missouri riverfront property, I am discouraged that the proposed fisheries statement to manage Walleye below Holter Dam as a native species is even being considered on this blue ribbon trout fishery- this section is a world class trout fishery that attracts visitors from all over the world - I doubt a Walkeye fishery will do the same!</p>	<p>3)</p>

	<p>In my opinion the Missouri River below the Holter Dam should be aggressively managed as a trout-only fishery. I believe that Walleye in this stretch of the river should be aggressively pursued so that they are not affecting the cold water fishery.</p>	<p>1), 3)</p>
	<p>The Missouri from Holter Dam to Cascade offers some of the finest trout fishing Montana has to offer. Please continue to manage this stretch of river for high-quality trout fishing. Please continue management to suppress walleye in this stretch of the Missouri, which I refer to as the "Holy Water." Walleye have a place in Montana, but they're not native--despite calls to have them managed as a native species.</p>	<p>1), 3)</p>
	<p>Considering the walleye a native species is a slap in the face of scientific management of our natural resources. Walleye are not native to this state and the designation of native species should never be a political decision. I encourage you to continue to institute full suppression measures for walleye in the Upper Missouri and protect our world-famous trout fishery. Montana will never be a destination walleye fishery, but we already have millions of dollars coming into our state every year for this fishery. Please do the right thing and follow the path of reason and science.</p>	<p>1), 3)</p>
	<p>(1) Page 245. Missouri River ? Holter Dam to Cascade Bridge management direction needs to be changed from "suppression" to "general" to acknowledge walleye as a valuable sport fish resource. The "no limit" needs to be changed to the same limits as Holter Lake for walleye.</p>	<p>1), 5)</p>
	<p>There is no place for walleye in the Missouri as they were introduced and already show harm to the fish that are native. Terrible idea to enhance their numbers by protecting them.</p>	<p>3)</p>
	<p>Please, let us remember and remind ourselves that walleye are non-native fish that will wreck havoc on native trout in the Missouri. Save the Missouri trout and keep walleye out.</p>	<p>3), 7)</p>
	<p>The Missouri River is a blue ribbon trout fishery---not a walleye fishery. Don't take the chance to ruin the trout fishing by improving walleye fishing. The walleye don't belong in the river at all---keep the no limit on walleye!!!!!!</p>	<p>1), 3)</p>
	<p>I support the full suppression of walleye management in the missouri river below holter dam</p>	<p>1)</p>
	<p>2) People cross continents to fish for wild trout in Montana. Specifically, the Missouri River below Holter Dam. Managing walleye here for anything other than suppression is not only ecologically dangerous, but economically reckless. Please recognize this stretch of the Missouri for what it is: a world class trout fishery, not a potential walleye fishery.</p>	<p>1), 3)</p>
	<p>I know the Walleye bigots are pressuring FWP to rescind the "No limit for walleye" harvest regulation in the Blue Ribbon reach of the Missouri. It's a Blue Ribbon fishery which attracts people from all over</p>	<p>1), 3)</p>

	<p>the world and dumps millions of tourist dollars. It's a Blue Ribbon fishery because of the trout, not the walleye. I strongly encourage FWP to maintain the current walleye management plan.</p>	
	<p>I have two concerns with our fisheries the perch limit being 50 a day at holter and no limit on walleye below holter to cascade bridge. The perch population has got to be dwindling down at holter every ice season person after person takes limits home. As for no limit on walleye there shouldn't be a limit on trout either. If we are worried about native versus non native fish then let's get the burbot and mountain Whitefish numbers up. This simple according to your thought on no limit on walleye below holter and no limit on northern pike in the upper Missouri river system.</p>	1), 3)
	<p>I am in favor of keeping this no limit for walleye. Even if I were not a trout fisherman, I would be in favor of keeping this no limit on walleye, because this is one of the streams in the state that garners the most revenue for the state - and it is not because of walleye fishing. I fish this section of the river many times during the year, and I have yet to find anyone who travels from a long distance and spends money in our economy to fish this section for walleye. It makes no economic sense to manage this section for walleye. Walleye are not a native fish in this section of the Missouri and should never be classified as such.</p>	1), 3)
	<p>Anything other than full suppression of walleye below Holter Dam is crazy. Why risk the multi-million dollar fly fishing industry below Holter Dam so a few natty light drinking walleye anglers can have some beer battered fish tacos and leave a bunch of Styrofoam along the river? All the peer reviewed science points to walleye as non native and illegally introduced in this section of the Missouri. By all rights, walleye shouldn't even be in the reservoir system above Holter Dam. Please follow good science, as you have, and continue to manage walleye with FULL SUPPRESSION below Holter Dam. The multi million dollar trout fishery below Holter Dam depends on FWP continuing to manage the Missouri as a world class trout fishery. Thank you</p>	1), 3), 4)
	<p>No limit on walleye below holter dam does not support the fact walleye numbers compared to rainbow in that section of Missouri river is unhealthy and sufficient action needs to be considered to reestablish a quality fisheries for walleye.</p>	3)
	<p>I understand why the fisheries management plan is developed to cover a 10 year period. Even with triggers in the plan, however, I believe an annual review of harvest data and netting data, as well as water conditions should be used to determine if changes should be made each year in regard to stocking, limits, or slot limits, including the stocking of forage fish. The walleye limit on the Missouri is ridiculous, especially when there has been no impact to the number of trout in the river from Holter Dam to Great Falls.</p>	1)

	<p>Management Type &amp; Management Direction needs to be changed from suppression to general to acknowledge walleye as a valuable sport fish resource. The no limit needs to be the same as Holter Lake walleye limits.</p>	<p>1), 5)</p>
	<p>We also need to revise the no limit for walleye below Holter Dam. I know that FWP recommended having a limit in place for walleye below Holter Dam and the Fish Wildlife Commission did not listen to FWP recommendations. There is plenty of scientific data that proves that walleye and trout can cohabitate in these waters without damage to either species.</p>	<p>1)</p>
	<p>#2 SURPRESSION OF WALLEYE BELOW HOLTER LAKE ON THE RIVER SECITION FROM BELOW HOLTER DAM TO GREAT FALLS SHOULD BE REMOVED DUE TO WALLEYES BEING NATIVE TO MONTANA AND IT IS JUST A OUT RIGHT CRIME TO SURPRESS ANY FISH. #3 NO LIMITS ON WALLEYE BELOW HOLTER ON THE RIVER FROM BELOW HOLTER DAM TO GREAT FALLS SHOULD BE REMOVED THIS IS ANOTHER CRIME IT LETS FISHERMAN BE OVER THERE LIMITS ANYWHERE IN CENTRAL MONTANA BECAUSE THEY CAN SAY THEY CAUGHT THE WALLEYE BELOW HOLTER DOESNT SHOW ANYONE GOOD ETHICS. #4 NO POSSESSION LIMIT OF WALLEYES BELOW HOLTER DAM SHOULD BE REMOVED BASED ON A NUMBER OF REASONS AND COMMON SENSE THAT MAKES IT SO THERE IS NO POSSESSION LIMIT ON ANY LAKE IN MONTANA.</p>	<p>1), 2)</p>

	<p>I have no problem with giving priority to the non-native trout in the upper section of this river [MO River] and would never support anything I felt was detrimental to the trout population. We have historically seen changes in walleye numbers with the higher water flow/flushing years, but they have never gotten out of line. (On average less than 1% of the total fish handled each year). There has never been any documentation that the walleye population in the river has been detrimental to the trout numbers. (Per the FWP staff testimony to the FWP Commission 10/7/2010). In fact the current draft plan still acknowledges that "no evidence has been gathered which suggests an ecological impact to trout in this reach...". Bottom line, trout are not being adversely affected by the walleyes in the system. In fact the trout numbers have been outstanding and sustained at very high levels. I found it somewhat ironic that the Commission a year later after acting to establish "no limit" on walleyes to protect the trout, increased the daily limits for trout in 2012. I have to think that the plan should not have the language of Management Type being "Suppression" for the river below Holter Dam. That is not needed and all it has done is reduced the quality of the walleye fishing in the lower section of the river and hurt the Holter fishery. The Management Type being "Liberal/Restrictive" as it is for Holter would allow the department some latitude and get rid of the negative stigma with a Department who wants to suppress or eradicate the walleye (a native fish) from this system by having a "no limit" on walleyes below Holter Dam and a 20 fish limit from Cascade to Black Eagle. I believe it would make better sense to have the limit consistent with whatever the limit is on Holter. In the event of an unusually high water flushing year, putting higher than desired numbers that flushed through, the Commission could implement a temporary "emergency order" to temporarily remove the limits as warranted. I doubt we will ever realistically see that happen, because the flushing in the high water years we have experienced for decades has never created a problem.</p>	1), 3), 5), 9)
	<p>Page 242. States during surveys ,FWP estimated 2017 RBT 4936 trout per mile and 2018 892 Browns per mile in the Craig section. That is 45% above LTA for RBT and 60% above LTA for Browns. Disease not an issue or concern here?? Next paragraph states: "Additionally, walleye and burbot are incidentally sampled during electrofishing operations. Over the period of record there have been changes in the number of walleye sampled in the Missouri River below Holter Dam. The increase in walleye production in Canyon Ferry Reservoir since 1994 appears to have resulted in an increase in walleye in the Missouri River below Holter Dam. THIS IS NOT TRUE. Show survey data to prove this. "However, no evidence has been gathered which suggests an ecological impact to trout in this reach at the population level. Many factors are present that could negatively affect trout populations, including</p>	1), 10)

	<p>increased densities of walleye (you just stated walleyes have no effect on trout populations!!), increase in angler use, prolonged drought conditions, and whirling disease infections. However, despite these factors in play for much of the past 25 years, trout populations appear resilient and show no evidence of decline. The FWP Commission established a "no limit for walleye" harvest regulation on the section of the Missouri River from Holter Dam to Cascade in 2011 as an effort to protect the rainbow and brown trout fishery". WHY??? If there is no data to prove walleye impact on trout and FWP biologists and managers have stated this in Commission and public meetings, WHY is there no limit on walleye below Holter? Blatent abuse of a game fish and personal agendas. The SUPPRESSION action needs to be removed.</p>	
	<p>Page 242 states that ULM stretch the walleye fishery increases in this stretch. This is not true and no data to show it. It should be a managed walleye fishery in this stretch, with fewer trout and is not a trout stretch lack of habitat so why are you not managing for walleye here then?</p>	11)
	<p>4. Get rid of the "no limit" on walleye below Holter. It is not justified and effectively creates a no possession limit in central Montana and makes other limits unenforceable.</p>	1), 2)
	<p>1. Get rid of the no limit regulation on Walleye below Holter Dam on the Missouri River, A 5 fish limit with one over 24"</p>	1), 3)
	<p>Fwp's current model of compiling a running average of 3 years of gill-net data before enacting change is extremely detrimental to potentially positively effect the future of our fisheries. For example Holters current sample data shows an extreme drop in yellow perch populations going from 60-80 fish per net in the past to 7 this fall, however with the current model nothing will be done to potentially remedy this for the next three years. At that point the damage is done without being able to make any effort whatsoever to change these problems while they are occurring. There is clear evidence that Walleyes native range included Montana, east of the continental divide. Montana FWP's current classification of walleye as an introduced non native species has done nothing but negatively impact their position in Montana as a highly sought after species. This classification needs to be removed and amended in order to move forward with our fisheries management plans. The no limit of walleye below Holter dam has created and enforced a divide within our fishing community. Walleye are stigmatized and demonized by the trout "purist" crowd and by eliminating the limit on walleye in this stretch of water to "protect" trout populations has done nothing but to divide fisherman based on their preferred method of take. Trout and walleye absolutely coexist throughout the country.</p>	1), 3)

	<p>FWP needs to make the Walleye Native to Montana based off of newer scientific evidence then what they are basing them not being native to. They need to contact American Fisheries Society and talk to the scientists that proved Walleyes are Native to Montana and stop fighting so hard against the walleye. Everything FWP does with about walleye in bias and negative that needs to change. The no limits on walleye below holter dam on the river needs to change. The no possession limit on walleye below holter dam needs to change to a reasonable amount 5 walleye. Tiber Fresno and Francis need to be managed better the numbers of walleyes per net there are down. 3 year running average on walleye in the gill nets and other fish needs to change. FWP needs to look into the mirror and really think about what they are doing because whats happening in western Montana with Walleyes is gross criminal bias and prejudice toward another species and should be against the law and the fisheries division management and biologist should be held accountable and should lose there jobs.</p>	1), 3)
	<p>4. Get rid of the "no limit" on walleye below Holter. It is not justified and effectively creates a no possession limit in central Montana and makes other limits unenforceable.</p>	1), 2)
	<p>I feel that the management plan for the upper Missouri River is way out of wack. From Toston Dam all the way to Craig on the Missouri used to be a fantastic fishery for all species. Walleye, Trout, Perch. It has drastically declined. The ridiculous catch limits for Walleye, especially unlimited catch below Holter is one of the worst decisions allowed to try to devastate a fishery. The tactics on Canyon Ferry to try to irradiate Walleyes instead of managing them has cause a big mess that will take years to correct. I'd like to see the catch rates for Walleye be managed to make all the waters a great fishery again for all anglers. Keep the catch numbers low with a slot to grow and manage ALL the waters, Especially below Holter. Also the Trout. The Trout numbers are way down. I'm told because of low stocking because of budget cuts. the State and FWP need to come up with a plan on Trout as well in ALL waters to make them all a QUALITY fishery. I've been told that Perch numbers are up in the mid lakes. Holter and Hauser. But I haven't seen any better fishing as far as size and numbers on Perch either. The whole plan has to be revised NOW and corrected almost YEARLY to get the waters involved back to being the QUALITY fisheries they once were and can be if managed correctly. It wouldn't hurt if a forage based food source can be introduced to help feed all the fish and help their growth rates. I know that would be possible as well.</p>	1), 3)
	<p>CHANGE: Under ?Fisheries Management? page 242; amend the end of the 3rd paragraph to read, ??from Holter Dam to Cascade in 2011 in an effort to reduce the numbers of walleye anglers and their boats by legalizing the extinction of a department recognized and managed gamefish from the</p>	1), 3), 10)

	<p>system.? REASON: There is no logical reason in this case to ?protect wild trout fisheries? through the elimination of an established gamefish. It?s hard to justify that decades of walleye predation have had such a detrimental effect on trout that it caused their population to more than double before the commission enacted the suppression policy in the current plan to protect the trout. Given seven consecutive years of overabundance and a current population that is over 45% of the long-term average, the policy of ?suppression? is unjust to say the least. Time to acknowledge that the real reason behind the suppression policy was an underhanded way to rid that water of walleye anglers and their boats.</p>	
	<p>As I understand it, walleye were an illegal introduction to the Upper Missouri River reservoirs back in the 1980’s. Since that time their population has exploded to the detriment of native fishes or non-native, but legally introduced species. I recognize that trying to remove all of the walleyes in those reservoirs would be like trying to remove a drop of oil from a glass of water. Those walleye are here to stay but I strongly believe that FWP must do everything in its power to prevent the spread of walleye into other, non contaminated waters and to eliminate it in those places where new introductions are discovered. The world class trout population below those reservoirs must be maintained. To that end I support a no limit harvest on all walleye below Holter Dam.</p>	3), 4)

**FWP Response to Comments on Missouri River Walleye Management**

<b>Comment Number</b>	<b>Comment Response</b>
1)	<p>The bag limit on the river below Holter Dam was eliminated in 2011 to reduce impacts to the coldwater fishery by walleye. Despite higher numbers of walleye in the river, no evidence has been gathered which suggests an ecological impact to trout in this reach at the population level. Many factors are present which could negatively affect trout populations, including increased densities of walleye, increase in angler use, prolonged drought conditions, and whirling disease infections. Despite these factors in play for much of the past 25 years, trout populations appear resilient and show no evidence of decline. FWP staff will propose instituting a walleye bag limit in the Missouri River below Holter during this regulation setting cycle, which begins spring 2019.</p>
2)	<p>There have been anecdotal reports of anglers catching over-limits of Walleye on Holter and saying they were caught in the river but follow up by Enforcement and Fisheries staff have found no prosecutable offence.</p>



Comment Number	Comment Response
3)	The top management priority for the Missouri River below Holter is to maintain a coldwater fishery consisting of wild Rainbow Trout and Brown Trout within a population range observed since 1982 and with a sustainable proportion of larger sized fish available to anglers.
4)	Walleye were first stocked in the system in Lake Helena (Hauser Lake) in 1951 by FWP and likely pioneered their way downstream into Holter and beyond. Walleye in Canyon Ferry Reservoir were the result of an unauthorized introduction.
5)	There are substantial differences in the habitats, fish populations, and fisheries management strategies between Holter Reservoir and the Missouri River below Holter Dam. As such management strategies (such as bag limits and population objectives) will be different in Holter compared to the river.
6)	There are no plans to stock trout or Walleye in the Missouri River. Both populations in the river are sustained by wild reproduction or flushing from upstream reservoirs.
7)	Rainbow Trout, Brown Trout, and Walleye in the Missouri River below Holter are sustained through wild reproduction or flushing from upstream reservoirs. All three species are non-native (introduced) to Montana.
8)	Walleye are recognized as an important game fish in Montana and are managed as such in several waters in Central and Eastern Montana.
9)	The commission already has the authority to implement emergency regulation changes when needed.
10)	Since expansion of the Canyon Ferry Walleye population in the late-1990s Walleye numbers in the river below Holter Dam have fluctuated, especially in years following high flows. Despite higher Walleye abundance, both Rainbow Trout and Brown Trout abundance has remained above long-term average.
11)	Despite lower abundance in trout in this reach compared to the upstream reach, it is still managed as a coldwater fishery with limited opportunity to catch Walleye.

**Management Plan Comments**

A total of 25 comments were received regarding management plans. Most of the comments (64%) were related to the Upper Missouri River Reservoir Fisheries Management Plan, which is currently under revision. Other comments were related to the renaming of the Program and Guide (rather than calling it a Management Plan) and concerns over the duration of management plans.

Management Plans	Comment	Response
Comment period	The U.S. Fish and Wildlife Service (Service) would like to request a two week extension to the comment period. As you are aware many agencies within the federal government have been closed for several weeks including large parts of the Service. As a result the Service is working through a backlog of requests and other work load issues. The Service believes that this is an important issues that deserves further attention. Thank you for your consideration.	1)
Comment period	The entire public scoping process needs to be reviewed. I understood there would be a 30 day public comment period. For this, the first news release about this comment period was posted Dec 17 on the Mt FWP website. So we see this effort with a deadline of January 13....covering a major holiday season with less than the 30 days for public comment ...maybe that complies with some law, but it doesn't send a very positive message of sincerely wanting public input.	1)
Identify Water Body Plans	Page 12, under Management Planning it talks about individual waterbody or species plans. Where relevant it would be could to identify those somewhere, either in an appendix with links or under the drainage discussions.	2)
Plan Duration	Management plans should not have a life of over 3 years at max. To have a plan that lasts for over 3 years invites management issues. Water and fish populations change and if something happens in an area, it should be addressed immediately in many cases. Limit the term life of your management plan.	3)
Plan Duration	I ask, why does the guide have to be in place for 10 YEARS? FWP should more quickly respond to visible problems, BE MORE RESPONSIVE, SOONER.	3)
Plan Duration, MO River Reservoir Plan	That is doing a plan that then is put in place through 2027 that based on historical review would appear to put in place something that they will follow without any consideration to any changes that may take place during the period of the plan. When other plans were done, we worked hard to ensure language was incorporated in the plan that it would be "adaptive" and allow for changes during the period of the plan. What we have seen from history is that the department has never done anything considering significant changes during the plan to adapt...they simolynhave followed a plan because it was what had been approv d and implemented. Seeing how they have managed the perch explosion in Holter in 2013 and seeing how they failed to do anything different than what has been spelled out in a management plan and allowing the fishery to crash is a prime example. For this reason a plan for the next 9 years should not be approved and implemented. Something that allows for more timely changes as may be warranted should be put in place.	3), 4)

Management Plans	Comment	Response
Plan vs Guide	The Draft contends and public outreach efforts have inadequately conveyed the distinction between adopting management directives as a Plan versus Guide, consequently, the public is deprived of meaningful comment related to that which arises through this distinction.	5)
Plan vs Guide	First of all, what happened to the “Plan” for fisheries management? The name change in the new document is concerning to us. The introduction states that “The name was changed because the plan was not prescriptive in that it did not propose specific management actions if defined goals or objectives were not met.” While the 2013 plan “provides a framework and directions” for “managing the state’s fishery resources” the new proposed plan according to Eileen Ryce “is a resource for anglers and others who want to know about how FWP programs help to ensure a great experience on Montana’s waters,”It appears that a “management plan” to provide direction has morphed into a mere angler’s guide to current conditions. The 2013 Fisheries Management Plan as well as the current proposal does provide specific management direction in that it lays out “how” and “why” we manage our fisheries resources for FWP staff. The plan was to “provide overarching direction and guidance to Managers” and “provides specific fisheries management direction for 40 drainages in the state”. The plan also lays out “Management Types” for any given situation. This seems “prescriptive” to us. However, this document does not lay out any specific commitment from FWP to future actions that will conserve or improve our fisheries.Either we have a management plan to lay out future management of our fisheries that the department will attempt to follow, or we have an anglers guide. It doesn’t seem that this document adequately provides either.	5)
Triggers	Long range planning is good as long as it is used as a guide only. The fishing can and does change due to weather, environmental conditions, and fishing pressure. I feel in the past fishing triggers have been improperly enforced causing a decline in fish populations. The Mt. FWP needs to stay on top of changing conditions and change triggers to accomidate the various fisheries for quality and quantity of fish.	5)
Upper MO River Reservoir Management Plan	Keep the limits the same as in Houser and Holter Resivours	4)
Upper MO River Reservoir Management Plan	FWP needs to reconsider their fisheries management of Canyon Ferry and the upper Missouri river system. This area was better managed in the late 1990's and early 2000's. Since then poor management has led to poor quality fishery. The liberal walleye limits need to be lowered and other	4)

Management Plans	Comment	Response
	management practices put into place to increase the quality. This area was once a quality trout, walleye and yellow perch fishery and can be again with proper management.	
Upper MO River Reservoir Management Plan	The only item on the plan that would like to see is East of the continental divide that walleye is a native fish. Other states on this side of the divide have excepted the fact walleye are a native fish and should managed as such. The other item is how FWP is managing our fishery with the three year average and the triggers. It is hurting our fishery drastically. It seems the FWP does not want any happy fisherman. "It is sad" Case and point is Canyon Ferry. You can be on CF for six hours and not catch a fish. It is very hard to get kids excited about fishing. We need to changed what we are doing. Another thought is use biology as a tool and not all we know.	4)
Upper MO River Reservoir Management Plan	I understand why the fisheries management plan is developed to cover a 10 year period. Even with triggers in the plan, however, I believe an annual review of harvest data and netting data, as well as water conditions should be used to determine if changes should be made each year in regard to stocking, limits, or slot limits, including the stocking of forage fish. The walleye limit on the Missouri is ridiculous, especially when there has been no impact to the number of trout in the river from Holter Dam to Great Falls.	4)
Upper MO River Reservoir Management Plan	canyon ferry walleye to many small fish i have had many 30 to 60 fish days without one over 15 inches	4)
Upper MO River Reservoir Management Plan	My comments are that I believe R4 fisheries and HQ fisheries has done a very poor job managing our fisheries in this part of the state. we have world class trout fishery below holter. In canyon ferry, holter, francis, tiber and missouri river holter to GTF the fishery sucks. Even trout in holter and cferry are waaay down. perch in the tanks, nothing is done. Limits are not adjusted, no slots to protect larger fish, nothing. holter goals are to provide a trophy walleye fishery by FWP... HOW are you doing that with a 10 fish limit and net data showing less than 2 fish per net. Tiber and Francis are the worst net data since sampling began, yet nothing is changed. Canyon ferry was once the best walleye fishery west of the Mississippi River, RUINED. Cferry is a put and take trout fishery... SO WHY CANT WE MANAGE IT FOR WALLEYE AND PERCH???? Tiber could be world class, I bet anyone in our fishery division cannot catch a limit of walleye in Tiber or Francis in a 8 hour day. 1 fish per hour is your goal. Time to manage our waters for multi species. Data proves walleyes do not affect trout populations so why are we suppressing such a highly sought after game fish!!!! time for change.	4)

Management Plans	Comment	Response
Upper MO River Reservoir Management Plan	Please give walleye more priority in canyon ferry. They are driving the local fishing economy. Canyon ferry gets a lot of angling pressure, The walleyes have been very stunted in the past few years! Please listen to the local anglers and manage this for walleye!!! Also are you sure they are not native to Montana anyway?	4)
Upper MO River Reservoir Management Plan	Start managing canyon ferry hauser and holter for walleye instead of just for trout. Rainbow and brown trout aren't native either so that's not a good argument. You already fumbled the perch in holter don't let it happen for walleye in ferry. Most of the people are fishing for walleye so Just accept it and move on. Don't screw our management in wildlife and fish at least get something right. Thanks	4)
Upper MO River Reservoir Management Plan	Fwp's current model of compiling a running average of 3 years of gill-net data before enacting change is extremely detrimental to potentially positively effect the future of our fisheries. For example Holters current sample data shows an extreme drop in yellow perch populations going from 60-80 fish per net in the past to 7 this fall, however with the current model nothing will be done to potentially remedy this for the next three years. At that point the damage is done without being able to make any effort whatsoever to change these problems while they are occurring. There is clear evidence that Walleyes native range included Montana, east of the continental divide. Montana FWP's current classification of walleye as an introduced non native species has done nothing but negatively impact their position in Montana as a highly sought after species. This classification needs to be removed and amended in order to move forward with our fisheries management plans. The no limit of walleye below Holter dam has created and enforced a divide within our fishing community. Walleye are stigmatized and demonized by the trout "purist" crowd and by eliminating the limit on walleye in this stretch of water to "protect" trout populations has done nothing but to divide fisherman based on their preferred method of take. Trout and walleye absolutely coexist throughout the country.	4)
Upper MO River Reservoir Management Plan	Since trout stocking in Canyon Ferry has been cut way back, regulations need to be changed to catch and release only in Canyon Ferry and in the Missouri above Canyon Ferry for several years until the populations are recovered. Stocking needs to be returned to previous levels as soon as possible. In addition the illegally introduced walleye and pike need to be eradicated.	4)

Management Plans	Comment	Response
Upper MO River Reservoir Management Plan	FWP needs to make the Walleye Native to Montana based off of newer scientific evidence then what they are basing them not being native to. They need to contact American Fisheries Society and talk to the scientists that proved Walleyes are Native to Montana and stop fighting so hard against the walleye. Everything FWP does with about walleye in bias and negative that needs to change. The no limits on walleye below holter dam on the river needs to change. The no possession limit on walleye below holter dam needs to change to a reasonable amount 5 walleye. Tiber Fresno and Francis need to be managed better the numbers of walleyes per net there are down. 3 year running average on walleye in the gill nets and other fish needs to change. FWP needs to look into the mirror and really think about what they are doing because whats happening in western Montana with Walleyes is gross criminal bias and prejudice toward another species and should be against the law and the fisheries division management and biologist should be held accountable and should lose there jobs.	4)
Upper MO River Reservoir Management Plan	From my understanding at the meeting attended in Bozeman on 12/18 was that there was not public comment period open because the commissioners throughout the proposed plan for rework. This is disheartening. Either the biologists at the meeting were dishonest or this website is not up to date. Both are major issues. For the last 20 years this management plan has not worked. The age, size distribution, and overall walleye fishing experience at Canyon Ferry and the rest of the water bodies included in the management plan has gone severely downhill. The 20 fish limit is not working and the biologists are not willing to listen. This was evident at the meeting in Bozeman. When the group told the biologists that no one is consistently filling there 20 fish limit (which is the case) the biologists said "That is really Hard for me to believe". If they ever fished the bodies of water that so call "manage" this might be evident. The biologists were also not responding to to questions or comment because by there words there was no proposed management plan in place to comment on. Apparently this was not the case. It is sad that our tax dollars and license fees are supporting a group that is unwilling to listen and have a preconceived agenda. They need to be help accountable.	4)
Upper MO River Reservoir Management Plan	I feel that the management plan for the upper Missouri River is way out of wack. From Toston Dam all the way to Craig on the Missouri used to be a fantastic fishery for all species. Walleye, Trout, Perch. It has drastically declined. The ridiculous catch limits for Walleye, especially unlimited catch below Holter is one of the worst decisions allowed to try to devastate a fishery. The tactics on Canyon Ferry to try to irradiate Walleyes instead of managing them has cause a big mess that will take years to correct. I'd	4)

Management Plans	Comment	Response
	like to see the catch rates for Walleye be managed to make all the waters a great fishery again for all anglers. Keep the catch numbers low with a slot to grow and manage ALL the waters, Especially below Holter. Also the Trout. The Trout numbers are way down. I'm told because of low stocking because of budget cuts. the State and FWP need to come up with a plan on Trout as well in ALL waters to make them all a QUALITY fishery. I've been told that Perch numbers are up in the mid lakes. Holter and Hauser. But I haven't seen any better fishing as far as size and numbers on Perch either. The whole plan has to be revised NOW and corrected almost YEARLY to get the waters involved back to being the QUALITY fisheries they once were and can be if managed correctly. It wouldn't hurt if a forage based food source can be introduced to help feed all the fish and help their growth rates. I know that would be possible as well.	
Upper MO River Reservoir Management Plan	Canyon Ferry & Holder Fish management has been a failure. If you look back to the years of the late 90's when large walleyes and Trout were doing great and anglers had a real quality experience. FWP has blamed the declining Perch population. If that is true Walleyes Unlimited has offered to fund floating islands on Pond 4 to help raise Perch through habitat. Its similar to the Christmas tree planting presently being done. Its a win win for Perch, Walleye and Trout and anglers. Also putting restrictive limits like 5 per day and only one over 21 inches on Walleyes. Large Walleyes forage on there own species. That's why we had a great large Walleye population in the late 90's. We hardly ever caught a 16 inch Walleye or smaller in those years.	4)

#### FWP Response to Management Plan Comments

Response Number	Response
1)	The initial comment period ran from December 13 to January 13 and was extended to February 4 based on public requests. The comment deadline was extended once again to February 15 to accommodate input from federal partner agencies.
2)	Waterbodies with individual management plans are discussed in the Management Direction tables. Waterbody management plans include the Upper Missouri River Reservoir Fisheries Management Plan (currently under revision), Fort Peck Reservoir Fisheries Management Plan 2012-2022, and the Flathead Lake Co-Management Plan. Individual species plans include the Management Plan for North Dakota and Montana Paddlefish Stocks and Fisheries (currently under revision) and the Montana Pallid Surgeon Management Plan (currently under internal review).

Response Number	Response
3)	The Program and Guide is intended to cover 2019-2027 with a mid-cycle review in 2023. The Program and Guide does not prescribe specific actions to be taken nor does it specify criteria to determine when management action is appropriate. Actions such as regulation changes will be evaluated on a case by case basis and will undergo public process prior to implementation.
4)	The Upper Missouri River Reservoir Fisheries Management Plan guides management for Canyon Ferry, Hauser, and Holter Reservoirs and river sections from Toston to Canyon Ferry and from Hauser Dam to Holter Reservoir. That management plan is currently under revision.
5)	Other fisheries management plans outline very specific and objective criteria to determine when management action should be taken, and also recommends what actions may be appropriate when criteria are met. The Program and Guide uses broad management types and relatively general management direction compared to very rigorous and defined criteria used in other management plans. For these reasons FWP believes that the Program and Guide is a better moniker for this document rather than the title of Plan.

**Fish Management Comments**

Fish management comments covered a wide array of topics, compiling 22 comments. Most comments were related to defining size criteria related to walleye management (36%) of comments.

Fish Mangement	Comment	Response
Mountain Lakes	It would be useful to have an objective to decrease the number of high mountain lakes that have fish species that are likely to be hindering native stream-fish populations in the Bitterroot through hybridization or competition. Bitterroot drainage lakes commonly have non-native species that appear to be escaping the lake and potentially degrading the native fish populations downstream. Examples include brook trout in South Kootenai Lake, rainbow trout in North Kootenai Lake, Big lakes and High Lake, and cutthroat hybrids in Peterson, Chaffin, Hart, and Tamarack lakes.	1)
Mountain Lakes	There should also be direction for the management of lakes for the benefit of other aquatic species such as amphibians. An objective to keep the Bitterroot’s fishless lakes fishless may be a useful signal	2)



Fish Mangement	Comment	Response
	with regard to ecosystem management. Or perhaps referencing a non-game management plan where this issue is addressed in detail.	
Native Fish	We wished the plan was more site-specific with some of these opportunities that were either focused on ongoing efforts or linked to near-term priorities. Specifically, where are the highest priority opportunities for all lands management and partnership? Without the specifics, the plan feels status quo versus being proactive and strategic. This is especially the case with native fish conservation and recovery. Where are those places that could, or do, include planned or ripe habitat and watershed improvement efforts that tie directly to opportunities for native fish emphasis via non-native fish suppression or management? This level of detail in strategic areas would make this plan stand out more as a road map in critical areas that need special attention. These sort of opportunities are mentioned generically for every drainage. Without specificity or emphasis however, linkages to other efforts such as the USFWS's 2015 Recovery Unit Implementation Plans for Bull Trout or the 2013 USFS's Bull Trout Conservation Strategy, or connections to Weyerhaeuser's or DNRC's Habitat Conservation Plans become more vague.	3)
Native Fish	Page 134. We commend efforts that FWP has contributed to or helped spearhead over many years via land acquisitions, habitat restoration and water management in a complex social setting. Cumulative effects to native fish and fish habitats are often difficult to disentangle. This is an area where habitat improvements in tributaries and mainstem habitats has led to demonstrable benefits for some native fish such as WCT. This is rare and noteworthy.	
Native Fish	Page 153, and throughout the Middle Clark Fork section. I note in the beginning of comments that this section had some of the best specificity and on native fish focus and effort with more specificity. We support collaborative efforts to strategically remove non-native fish from headwater lakes above important native fish habitat. It is one of the only places that talks about enforcement in support of regulations. It is also one of the only drainages where a strategy for fishless lake is considered.	4)
Native Fish	The Service supports the primary goal of FWP's Fisheries Division, to protect, maintain, and restore native fish populations and their genetic diversity, backed by FWP policy and state law. This goal supports the state programs that manage sensitive native species in a manner that assists in the maintenance or recovery of those species, and prevents the need to list species under ESA and aids in the recovery of listed species.	
PSD	Overall [walleye] goals should be to maintain a proportional stocking density of 30-60.	5)
Rainbow Trout Stocking	Since trout stocking in Canyon Ferry has been cut way back, regulations need to be changed to catch and release only in Canyon Ferry and in the Missouri above Canyon Ferry for several years until the	6)

Fish Mangement	Comment	Response
	populations are recovered. Stocking needs to be returned to previous levels as soon as possible. In addition the illegally introduced walleye and pike need to be eradicated.	
Rainbow Trout Stocking	I feel that the management plan for the upper Missouri River is way out of wack. From Toston Dam all the way to Craig on the Missouri used to be a fantastic fishery for all species. Walleye, Trout, Perch. It has drastically declined. The ridiculous catch limits for Walleye, especially unlimited catch below Holter is one of the worst decisions allowed to try to devastate a fishery. The tactics on Canyon Ferry to try to irradiate Walleyes instead of managing them has cause a big mess that will take years to correct. I'd like to see the catch rates for Walleye be managed to make all the waters a great fishery again for all anglers. Keep the catch numbers low with a slot to grow and manage ALL the waters, Especially below Holter. Also the Trout. The Trout numbers are way down. I'm told because of low stocking because of budget cuts. the State and FWP need to come up with a plan on Trout as well in ALL waters to make them all a QUALITY fishery. I've been told that Perch numbers are up in the mid lakes. Holter and Hauser. But I haven't seen any better fishing as far as size and numbers on Perch either. The whole plan has to be revised NOW and corrected almost YEARLY to get the waters involved back to being the QUALITY fisheries they once were and can be if managed correctly. It wouldn't hurt if a forage based food source can be introduced to help feed all the fish and help their growth rates. I know that would be possible as well.	6)
Rainbow Trout Stocking	I support adding Money to support higher funding for stocking rates in Hauaer Holter and Canyon Ferry reservoirs. Higher license fee is acceptable.	6)
Science based decisions	Page 10 Proactively manage fish and wildlife populations in a transparent and science-based manner.	7)
Size Criteria	The information in this plan should be changed on Walleye and what constitutes a decent consumable size etc. I believe a walleye below 14 in is not worth the effort . Decent eater fish should be considered 14 to 19" size with 20--25 being a quality fish and 25 and up considered trophy class. Take Canyon Ferry as and Example, look at the data 80% were under 13" How awful management has been. I live in White Sulphur Springs and it is a shame i have to travel much farther to get a quality fishery.	8)
Size Criteria	(3) Part II, Page 59, section E. The definitions should include an additional ?trophy? designation and a revision to the "quality" definition. What is defined in this guide for a ?quality? fishery is not what most people would consider a ?quality? fishery. There is a significant difference between what anglers believe a ?quality? fishery is vs. a ?trophy? fishery. For the purposes of overall objectives we need that distinction.	9)
Size Criteria	3. Definitions need changes...better define what a "quality" fishery is and what a "trophy" fishery is.	9)

Fish Mangement	Comment	Response
Size Criteria	The Division should add "trophy" as an additional identified management type and include it to applicable situations throughout the Draft.	9)
Size Criteria	3. Definitions need changes...better define what a "quality" fishery is and what a "trophy" fishery is.	9)
Species conservation	I suggest that genetically pure populations of cutthroat trout that meet that definition be salvaged prior to rotenone treatment and replaced back into those waterways. After all, if the goal is to protect genetically pure cutthroat trout, then protection of the resident fish should be important instead of just stocking cutthroat trout from a hatchery. Research has shown that salmonoids within certain streams have distinctive genetic markers unique to those streams. An example is Soda Butte Creek. It should not have taken comments from the public for MT FWP (and YNP, WY F&G) to salvage the resident fish, MT FWP should have had that in their initial plan.	10)
Wild Fish	Page 11, the term "wild fish production" is used though I don't think it is defined anywhere and should be clear that this can include both native and non-native fish.	11)
Wild Trout	Page 133, Blackfoot River Drainage. "The Blackfoot River is managed as a wild trout fishery, emphasizing natural reproduction of free-ranging and naturalized nonnative trout. The basin is also a focus for native trout recovery efforts." This needs more discussion of compatibility be managing for naturalized non-natives and native recovery efforts. Are there places to emphasize native fish to the detriment of non-native wild through harvest and other management options?	12)

### FWP Response to Fish Management Questions

Response Number	Response
1)	FWP has reduced or eliminated stocking of lakes or reservoirs that could jeopardize downstream populations of non-hybridized native fish. Depending on the risk factors of downstream waters, if pure fish are not available lakes are getting stocked with triploid (sterile) trout to reduce risk of hybridization.
2)	This management strategy has been implemented in mountain lakes across Montana. FWP is working to keep fish out of historically fishless lakes to preserve the ecology of those systems.
3)	FWP believes the appropriate placement of these issues is in the waterbody management sections. Most opportunities to enhance and improve native fish populations are on the waterbody level, with biologists and local land managers working together to identify improvement opportunities. FWP will continue to work with partners to implement and maintain conservation and recovery strategies.

Response Number	Response
4)	There have been many opportunities to enhance native fish populations in the Middle Clark Fork basin, which is also reflected in the narrative for this section in the Program and Guide. FWP will continue to identify opportunities to conserve native fish populations within this basin and throughout the state. FWP will also continue to identify opportunities to conserve aquatic ecosystems in fishless lakes.
5)	Proportional Stock Density (PSD) is a commonly used fish management metric to quantify size structure of a fish population. PSD's are most commonly used in sport fisheries to maintain a size structure desirable by anglers. For walleye fisheries a PSD between 30-60 is considered a well balanced fishery. The Fort Peck Fisheries Management Plan outlines PSD targets to maintain a desirable size distribution. FWP will continue to use PSD to evaluate sport fish populations.
6)	Due to budget cuts in 2017 stocking of catchable size (fish > 7-inches) rainbow trout in Canyon Ferry, Hauser, and Holter Reservoirs was cut roughly in half. Predictably, rainbow abundance in the reservoirs declined. Further management action (regulation changes) were delayed to see if the legislature is going to approve a new budget. It now appears the budget will be approved and stocking catchable sized rainbows will resume by 2020. The rainbow fishery is expected to rebound quickly once stocking is at preferred levels, so a short-term regulation change will be considered for the 2020 regulations and increase limits once the rainbow fishery is back to acceptable levels.
7)	FWP staff recommendations are typically based on the best information available. However, biologically sound decisions or recommendations may not be socially acceptable. The Fisheries Division strives to be transparent and consider public input to the extent possible. The FishMT page on the FWP website provides public access to much of FWP's fish monitoring data as well as provide other important fisheries information.
8)	Walleye abundance in Canyon Ferry were at record-high levels in 2017, which tripped management triggers as outlined in the Upper Missouri River Reservoir Fisheries Management Plan. FWP implemented a regulation change to increase harvest while protecting larger fish. The record high abundance was a function of the high number of smaller sized fish; if the regulation works as intended the number of more desirable fish should increase and number of smaller fish should decrease. Once population abundance falls within acceptable levels new regulations will be evaluated.
9)	Comments received regarding size criteria were in reference to walleye size categories. The "Quality " management approach on page 59 of the draft contained a very broad definition of Quality. The final Program and Guide still has a broad definition because the criteria is necessary for multiple species (not only walleye), but has additional clarification of how FWP distinguishes "Quality" and "Trophy" type categories.
10)	After Soda Butte Creek, FWP now evaluates ways to salvage or transport cutthroat from streams that will be treated. Logistically it may not be possible to transport or salvage fish from every project, but it is now considered for all rotenone projects.

Response Number	Response
11)	A definition of "Wild Fish" can be found in the glossary. The final Program and Guide provides language that a wild fish can be either native or non-native.
12)	The conservation/restoration program has focused on increasing watershed connectivity to conserve life history diversity (i.e. migratory populations), while identifying specific areas to maintain or establish isolated, secure strongholds of native species. The North Fork Blackfoot River above North Fork falls is an area identified for the removal of non-native trout, and subsequent establishment of native trout species. Increasing native species production through continued targeted restoration in priority tributaries, rather than removal of non-natives, is likely the most effective form of native species conservation. Further liberalization of harvest limits is probably not a viable method to reduce abundance of non-native trout because most anglers do not harvest fish. The most recent creel survey data in 2004 showed 98% of interviewed anglers released all fish caught (Pierce et al. 2006), which had increased from 95% in 1999 (Schmetterling and Bohnemann 2000) and 84% in 1994 (Peters and Workman 1996).

**Fishing Regulation Comments**

Ten comments were submitted that specifically address fishing regulations. Most comments were related to increasing opportunity for spearing for fish in some waters.

Fishing Regulations	Comment	Response
Slot limits	[Walleye] Fisheries in central Montana have drastically declined. Numerous incidents in the past few years indicate the appropriate action to maintain quality fisheries have not been taken. Canyon ferry had slot limit that almost eliminated quality breeding walleye.	1)
Slot limits	When abundance is maintained from primarily natural reproduction, possession limits and/or slots should be evaluated to protect the prime spawning population when warranted by creel census and fall netting data.	2)
Slot limits, Channel Catfish	Would like to see slot limits implemented on all warm water species, a reduction in the daily and possession limit for cat fish from from 10 a day to 5 and from 20 in possession to 10. From what I have read in this 503 page document there seems to be little research done on cat fish, this being said I feel that being proactive rather than reactive is the right thing to do.	2), 3)

Fishing Regulations	Comment	Response
Regulation Cycle	2. The current four year cycle for regulation changes needs to be changed and the department needs to be more responsive and work to conserve, preserve, protect and sustain our fisheries.	4)
Gear restriction, Permits	Other states implement "barbless" and "barbless catch and release" regulations. The ethical harvest of fish should equal the ethical harvest of wild game. These opportunities could be added to our FWP fisheries management to generate additional conservation moneys through special "tags" or permits to fish in creeks and streams currently and permanently CLOSED. Hallowat Creek, Big Creek, Whale Creek, Coal Creek etc. There is a lot of fishing opportunities to complement existing recreational activity in the North Fork and beyond.	5)
Trout limits	The standard trout limit of 5 fish per person per day is overdue to be changed. With increasing angler days, invasives, algae blooms, and warming temps, a more restrictive standard limit is necessary (2 fish per person per day?). A lot of anglers practice catch and release already, so they will support this change. Allowing each carload of 4 anglers to leave a river with 20 wild trout in their cooler is poor wild fishery management. Thank you for considering this overdue management change	6)
Spearing	I would like to see more spearing opportunities for pike. The lower Clark fork and flathead would benefit from pike reduction I would think. Also some spearing for Perch. It seems like they are non native and the general idea is to lower their populations.	7)
Spearing	As a long time Montana fishing outfitter I would like to see more emphasis placed on the removal of invasive species beyond the scope of mussels and aquatic vegetation. There are many waterways containing transplanted or invasive pike, walleye, perch, and lake trout in western Montana. As an avid free dive spear fisherman I would like to see Montana expand its regulations regarding spear fishing in the western district and follow suit with many western states that have benefited from spear fisherman removal of invasive species. A mandatory kill mandate for the bitterroot river would also be a good common sense start to addressing the rampant pike population.	7), 8)
Spearing	Hello, please consider increasing opportunities to spearfish pike in more locations as well as other non native species especially yellow perch and bass. Spearfishing can provide recreation and concurrent non-native species management. This is becoming more common in Hawaii and other places. Wherever your guide suggests reducing populations please open up spearing options. We have a very good look at what we catch and abide by the same limits as others. We often operate with size restrictions without issue.	7)

Fishing Regulations	Comment	Response
Spearing	I would like to be able to clean and consume fish, while camped on the ice. Cannot be done under current regs. Make the possession Countable, and identifiable. Go back to the square inch of skin left on a fillet. I would also like to see all waters open to fishing, open to dark house spearing of northern pike, unless otherwise specified. The Northern Pike explosion is going to eat us out of house and home!!!!	7), 9)

### FWP Response to Fishing Regulation Comments

Response Number	Response
1)	Most walleye fisheries in central Montana are monitored at least annually to evaluate fish population trends. Management decisions are based on outcome of monitoring surveys and weighing best practices for managing the overall fishery. Length restrictions (a type of slot limit) have long been in place on Canyon Ferry to protect larger, breeding age walleye.
2)	Based on literature, slot limits are appropriate fish population strategies if a population meets the following criteria: good natural reproduction; slow growth, especially for small fish; high natural mortality of small fish; and high angling effort. Many Montana sport fisheries do not meet these criterion.
3)	Based on fishing pressure and monitoring trends for Channel Catfish the current bag limit and possession limit are adequate to maintain the sport fishery. Criteria listed in response 2) would be considered prior to instituting a slot limit.
4)	The four-year cycle is in place to allow time for regulation changes to work and to reduce time for FWP staff and the angling public must devote to the regulation process. As outlined in the Program and Guide, during off-cycle years regulation changes can still be made if they meet the following criteria: 1) clarifications; 2) enforcement; 3) conservation; 4) relevancy; and 5) management plans.
5)	FWP is considering a gear restriction on the North, Middle, and South Forks of the Flathead River to single hooks only. During FWP monitoring surveys, up to 40% of westslope cutthroat trout show evidence of previously getting caught by angling. Reducing to single hooks may reduce handling mortality, but the Department does not feel that even more restrictive gear (such as barbless hooks) are not needed at this time. Barbless hooks may be considered in the future.
6)	Biologically most trout fisheries are resilient enough to allow harvest of 5 fish. Many fisheries could sustain or even improve quality with increased levels of harvest. If monitoring determines that angling pressure or other limiting

Response Number	Response
	factors on a waterbody are impacting the fishery then lower bag limits and/or length restrictions may be implemented.
7)	FWP is going to consider additional spearing opportunities for Northern Pike during the 2020 regulation setting process. Spearing for other species such as Yellow Perch or bass are currently not proposed.
8)	The northern pike population in the Bitterroot appears to be habitat limited and the extended fishing season provides additional harvest opportunity for pike. FWP may consider increasing or eliminating bag limits or mandatory harvest, should pike abundance continue to expand.
9)	While a person is fishing, or while on the water or on the ice: all fish in possession must be identifiable to species; and all fish in possession must be whole with head, skin, fins, and tail attached.

***Aquatic Invasive Species Comments***

Eight comments pertained to the AIS program. Comments ranged from funding the program to addressing didymo in waterbodies.

AIS	Comment	Response
	As a long time Montana fishing outfitter I would like to see more emphasis placed on the removal of invasive species beyond the scope of mussels and aquatic vegetation. There are many waterways containing transplanted or invasive pike, walleye, perch, and lake trout in western Montana. As an avid free dive spear fisherman I would like to see Montana expand its regulations regarding spear fishing in the western district and follow suit with many western states that have benefited from spear fisherman removal of invasive species. A mandatory kill mandate for the bitterroot river would also be a good common sense start to addressing the rampant pike population.	1)
	3. Page 18 Aquatic insects should be priority but since no documented found in Montana at this time the majority of the protections should be t our state lines with 24/7 monitoring and done properly. i have fished in the east and inspection on my boat was very poorly done.	1), 2)



AIS	Comment	Response
	Canyon Ferry Reservoir - Restore previous stocking numbers of rainbow trout. The fishing quality and numbers are noticeably affected downwardly. If not, place more focus on improving the walleye fishery. If funding is a problem, suggest a trout stamp, reservoir stamp or just a general increase in license fees. To fund the invasive species effort, charge the most likely challenges, i.e., the boat owners for a registration tag. In Canyon Ferry, extend the 200' no wake zone to ALL boat docks and vessels, as is the rule in Western waters.	3)
	Regarding the AIS Program, I support the check station system and the education efforts, but I DO NOT agree with the current funding mechanism. It is unreasonable, unfair, and not financially sound to fund this program through extra fees for fisherman only. The fact is that the majority of in-state fisherman already take great care to prevent transferring water or AIS between bodies of water in the state. There are a lot of boaters and recreation users who don't purchase fishing licenses and are far more likely to introduce AIS, yet they are NOT paying any fees to help prevent AID introduction. In my opinion fisherman already pay high license fees and should not have to pay this extra fee. The boaters and other water recreation users should be paying the extra fee. Additionally, the out-of-state boaters and fisherman are the real source of AIS, so they should be required to pay extra fees to fund the AIS Program. If they're already driving hundreds of miles hauling boats, etc., then a small fee for them to recreate on MT waters is very reasonable.	3)
	I urge your agency to continue suppressive policies and practices regarding ANY animal or plant species which science has shown to not naturally occur in any Montanan waters. A walleye, for example, is out of it's natural range if the species was not present until recent historic past. No different than Quagga mussels.	4)
	Walleye are not a native species to Montana and should be managed as invasive in the Holder Dam area and throughout Montana's waters. The Management Program and Guide should strongly attest to control of walleye as nonnative. Walleye, smallmouth bass, pike, and other nonnative predators must be managed as invasive species that threaten native trout, whitefish and minnows.	4)
	Page 34. States some specific threats to aquatic habitats in MT include: "Climate change with its consequent water quantity and quality changes." - Really climate change? Does not list AIS in this section at all. WHY NOT.	5)
Didymo	I would like FWP to make an effort to reach out to researchers and others looking for a solution to this (didymo) problem. If a solution could be found to solve this problem, fish populations will certainly respond in a positive manner.	6)

### FWP Responses to AIS Comments

Response Number	Response
1)	FWP monitors waterbodies throughout Montana for invasive species, including fish, insects, plants, mollusks, pathogens, and animals.
2)	Inspecting boats entering Montana for AIS is a high department priority. Boat check stations are strategically placed at popular points of entry to the state and other well-traveled areas within state lines. Boaters are encouraged to report any problems or concerns associated with boat check stations to FWP as soon as possible.
3)	Funding for AIS and mechanisms for funding are being considered during the 2019 legislative session. At publication, there are still several funding mechanisms under consideration.
4)	There are several non-native fish species that are important game fish in Montana. Rainbow trout and walleye are both non-native species of fish but are a high priority for FWP as game fish.
5)	AIS and impacts to aquatic habitats are addressed under the Aquatic Invasive Species Program on page 54.
6)	FWP has partnered with other state and Federal agencies to learn more about <i>Didymosphenia geminata</i> (also known as didymo) in impacted waters. For example, FWP worked with the US Army Corps of Engineers and a graduate student to identify causes and potential remedies for didymo in the Kootenai River below Libby Dam. FWP will continue partnerships and pursue additional opportunities to address didymo.

### Unauthorized Placement of Fish (Illegal Introductions) Comments

Seven comments were received on the Unauthorized Placement of Fish (commonly known as illegal introductions).

UPF	Comment	Response
	Page 27 refers to Unauthorized Placement of Fish which is a current priority of MWF. However, that wording is not descriptive to many anglers. The term “Illegal Fish Introductions” would be better recognized by anglers, is more descriptive and covers 99% of the introductions that occur. There are several laws, rules and policies that are not included at the end of the section including ARM12.7.1501-1505, and MCA 87.5.601-606 (TIPMONT) and MCA 87.5.721 (penalties). FWP needs to place more emphasis on prevention through education and also for detection and conviction of those	1), 2)

UPF	Comment	Response
	illegally planting fish. FWP needs to develop a funding source to aid regions in chemically removing illegal fish, both as a deterrent and to restore lost fishing opportunity.	
	Page 27-28: Increase penalty for bucket biology, close fishing for illegally introduced species.	3)
	As a long time Montana fishing outfitter I would like to see more emphasis placed on the removal of invasive species beyond the scope of mussels and aquatic vegetation. There are many waterways containing transplanted or invasive pike, walleye, perch, and lake trout in western Montana. As an avid free dive spear fisherman I would like to see Montana expand its regulations regarding spear fishing in the western district and follow suit with many western states that have benefited from spear fisherman removal of invasive species. A mandatory kill mandate for the bitterroot river would also be a good common sense start to addressing the rampant pike population.	4)
	Second: I encourage FWP to consider the long term effects of classifying an illegally introduced species [Walleye] as "native." I have no issue with warm water species angling, however, I don't think FWP should reward illegal introductions by giving the species "native" status, and managing the fishery for the benefit of the illegally introduced fish. This may encourage illegal introductions in other coldwater fisheries across the state.	5)
	3) Recognizing walleye as a native species encourages aspiring bucket biologists to play the long game. We've already set a dangerous precedent by managing walleye as a game species in the upper Missouri River Reservoirs that forgiveness is easier than permission. Want your local reservoir managed for your favorite warm-water species, be it bass, pike, or walleye? Dump a few buckets in, give it time, and eventually the Department will manage it for your desired species. Again, please side biological science, not social science, and manage our fisheries for native species.	5), 6)
	Instead of rewarding illegal introductions by declaring walleyes a native, or by holding fishing derbies in waters where they exist the FWP should be doing more to eliminate or reduce those populations to a level where they pose little threat to our real native trout. Manage walleye as a game fish in those waters above Holder dam; allow no limit harvest in all other waters of the state; and do a more forceful job in discouraging illegal introductions and punishing those who are responsible.	3), 5)
	There seems to be some confusion between the "Recruitment Source" terms "Wild" and "Transfer" to define where new members of a fish population came from. "Transfer" is used to describe wild fish that were transferred from one water body to another. An example would be Horseshoe Lake (p. 97) where Yellow Perch are listed as "Transfer" even though this is clearly a reproducing population of	7)

UPF	Comment	Response
	illegally introduced fish. "Transfer" does not indicate whether the transplant was legal or criminal. There still needs to be more clarity in the "Recruitment Source" field when fish are illegally introduced. We support adding a term to this field that would better explain when fish were illegally introduced.	

**FWP Response to Unauthorized Placement of Fish Comments**

Response Number	Response
1)	Unauthorized Placement of Fish is used in place of illegal introduction because other vectors may be responsible for range extension of undesirable fish species. For example, a dam failure on a permitted pond may result in a species flushing downstream into other waters where that species was not present before. This type of introduction would not be illegal. New species could also be introduced to waterbodies via transport from other wildlife or natural occurrences such as floods.
2)	Appropriate references to laws and rules have been added to the Program and Guide on page 28.
3)	FWP's TIP-MONT program offers rewards for reporting unauthorized fish introductions. Additionally, pledges from the Invasive Species Action Network, Walleyes Unlimited of Montana, Montana Catfish Association, Montana Trout Unlimited, Bass Nation, Bass Federation, Montana Pikemasters, and Fishing Outfitters Association of Montana provide reward money for convicted unauthorized introductions. As of spring 2019 rewards up to \$19,750 are offered for reporting an unauthorized introduction.
4)	As outlined on page 28 of the Program and Guide, FWP develops an action plan for each unauthorized introduction and evaluates management actions based on a risk and feasibility assessment that considers the risk of expansion to surrounding waters, the current distribution of the unauthorized species and the proximity of those populations to the new placement, the probability that the species will survive and propagate, the potential impact on the existing fishery, and the immediate and long term economic impact to the department and the public. Eradication or suppression of the unauthorized species will be attempted if the risk and feasibility assessment deem such effort practical and necessary. Revisions of management actions can be modified to accommodate population changes or increasing or decreasing impacts from the introduction.
5)	Although walleye are considered non-native in Montana, they are not illegally introduced across the entire state. There are many waters that have been stocked with walleye by FWP and are actively managed to maintain the walleye fishery.

Response Number	Response
6)	In some waters, such as Canyon Ferry, there was an unauthorized introduction of walleye where initial suppression efforts failed to limit expansion of the population. Due to cost effectiveness of suppression efforts and social pressure fisheries management objectives shifted to accommodate the walleye fishery.
7)	In the final Program and Guide additional criteria to define unauthorized introductions is included.

**Recreation Management Comments**

Despite river recreation management currently being a contentious topic, only 6 comments were received on the issue. Four comments were based on outfitting and two were based on boaters and user conflicts.

Recreation	Comment	Response
River Recreation	A major issue on Montana rivers, especially the "blue ribbon" streams like the Missouri below Holter, the Madison, and others is the proliferation of outfitters on the water. It's had a real negative impact on fishing opportunity and the enjoyment of spending time on the streams. While I understand that Outfitters and Guides do have a role they provide, there needs to be limit in the number of days they should be allowed on the water. There also should be a limit to the number of Outfitters and Guides that are allowed to operate. The commercialization of fishing should not be an acceptable use that overshadows the average citizen's opportunity to spend some time on the river. I hope that this issue is addressed in the near future, because the longer it goes on the more difficult it will be to take action. That would be unwise, as the resource will be impacted and the average fisherman/woman will likely reduce or possibly quit fishing altogether because it is no longer enjoyable.	1)
River Recreation	The Water Recreation and Access Program will gain increasing priority as Montana's population increases, tourist visitation increases and private land use changes. Montana enjoys the best stream access laws in the nation, the public will increasingly need public points to legally access water. Funding for site acquisition and development has not kept pace with demand and ways to increase funding are needed. Likewise, the program acknowledges that a substantial amount of use is by non-anglers. Those people place demands on sites while not contributing funding through fishing license fees. Water access is important to most Montanans and visitors, new revenue sources need to be developed to help fund that use. FWP needs to develop resources to measure use changes and	1), 2)

Recreation	Comment	Response
	conflicts, to develop strategies to mitigate conflict and funding to implement user management programs.	
Power Boats	4. Ban all gas power boats from the Missouri River from below Holter dam to Cascade.	3)
Jet Boats	The Statewide Management Plan & Guide should uphold the current status of walleye as a non-native species in Montana's waterways. I support the peer-reviewed science that guide's the Department's classification of this illegally-introduced species as non-native to Montana. Additionally, I support the full suppression of walleye management in the Missouri River below Holter Dam. People cross continents to fish for wild trout in the Missouri River, and altering the management of walleye from anything other than full suppression places unnecessary risk on this world class fishery that draws millions of dollars to our local economy. I recently purchased property on the Missouri near Mountain Palace solely for the world-class trout fishing. Walleye are available above Holter. Plenty close enough for local walleye fishermen to take advantage of. Increasing the walleye population will not only hurt the wild trout fishery, it will also attract more traffic and jet boats, ruining this beautiful stretch of river. Thank you	3)
User Conflicts	Enacting regulations that prohibit angling from a boat cannot and should not be a staple solution for conflicts between wade anglers and float anglers. The overarching commitment of the agency is to minimize conflict. Instead, enacting regulation that prohibit float anglers demonstrate favoritism for wade anglers and brews hostility between two recreational user types.	4)

#### **FWP Response to Recreation Comments**

Comment	Response
1)	The popularity of some waterbodies and multiple recreational interests is leading to conflict on some waterbodies. River recreational planning is a high priority for FWP and the Department will continue to work with the involved interests to find solutions to accommodate recreational use while minimizing resource impacts.
2)	FWP will continue to identify and prioritize opportunities to improve recreational access to waterbodies.
3)	Currently there is limited conflict between power boats and float and wade anglers. There are no plans to ban or limit use of power boats in the Missouri River below Holter Dam.
4)	FWP agrees that limiting or prohibiting a certain recreational type limits opportunity and can lead to conflict. Recreational plans are based upon specific conflicts by waterbody, and using one prescription (e.g., favoring wade angling over boaters on all waterbodies) does not address the source of conflict.

**Habitat Comments**

Six comments were related to habitat issues. Topics covered included restoration, riparian management, and funding.

Habitat	Comment	Response
Restoration	Perhaps it is also time to take a broader look at the way we fund restoration. It seems all too apparent that existing resources are small compared to the scope and scale of the legacy problems we're dealing with. Given the obvious and increasing economic value of our fishery resources, new earmarked restoration funding would seem easy to justify. It would be no different than investments in restoring the state's aging infrastructure, and the return on investment would be assured. We would encourage MFWP, its sister agencies, the Governor's Office and the Montana legislature to explore public interest in and funding for comprehensive watershed and fisheries restoration. Perhaps this would be an appropriate use of some of the state's coal tax trust dollars, which were derived from development of our state's natural resources - the overriding cause of many of our legacy impairment problems and fishery limitations. Again, a coordinated interagency approach to administering any new restoration dollars would seem to make the most sense. The agencies could work closely with the dozens of local Montana watershed groups and conservation districts that are already pursuing local restoration activities with extremely limited resources.	1)
Restoration	With respect to earlier snowmelt, faster runoff and longer low-flow seasons, the best remediation strategies appear to be based on watershed/floodplain restoration to increase natural storage capacity. The Nature Conservancy (TNC) is actively engaged in identifying and prioritizing critical basins in Montana where natural floodplain functions can be restored to raise water tables and augment late season flows. These efforts include enhancing riparian vegetation, rebuilding floodplains, re-establishing river access to floodplains and side channels at high flows, and experimentation with beaver-mimicry structures to slow runoff and increase water storage. The French Gulch project, a cooperative effort led by the Big Hole Watershed Committee is a good example of the restoration opportunities that the SMPG should be highlighting as a hedge against the impacts of climate change. I would like to see the Department partnering with TNC, other conservation organizations and federal agencies in a broader, coordinated effort to enhance watershed resiliency where it has the most potential to offset the adverse effects of climate change on Montana's fishery resources.	2)
Riparian Management	If you want to protect our waterways, you must begin by ending mining, logging and grazing anywhere near riparian zones. Plain and simple. A plan must be provided to end these practices and protect our rivers.	3)

Habitat	Comment	Response
Habitat impairment	In Part II of the document, which describes fisheries management direction for each of the state's 40 drainage basins, we were dismayed at the extent of legacy watershed impairment problems that continue to limit Montana's fisheries. Impairment problems described in Part II include: hydromodification associated with hydropower and irrigation dams and diversions; riparian degradation and streambank and stream channel alterations; toxicity issues associated with heavy metals, dioxin/furans, PCBs, and mercury; nutrient derived eutrophication and associated dissolved oxygen depletion; sedimentation from roads, grazing and logging; habitat connectivity issues; and many others.	3)
Habitat funding	Page 41, under Restoration Grant Programs. The Future Fisheries Improvement program and collaboration with FS and their partners have led to instrumental habitat improvements on the ground. This includes actions like placer minesite reclamation, culvert barrier remedies, fish screens to eliminate fish entrainment with water withdrawal, large wood and channel restoration, and on and on. This has led to all lands solutions in important native fish watersheds. Similar, the Forest is able to use agreements to move money to FWP in other situations for similar actions. We have worked with local biologists and state administrators to figure out the best instruments to move, receive, and protect funds for habitat improvements.	1)
Habitat, native fish	Page 134. We commend efforts that FWP has contributed to or helped spearhead over many years via land acquisitions, habitat restoration and water management in a complex social setting. Cumulative effects to native fish and fish habitats are often difficult to disentangle. This is an area where habitat improvements in tributaries and mainstem habitats has led to demonstrable benefits for some native fish such as WCT. This is rare and noteworthy.	1)

#### FWP Response to Habitat Comments

Response Number	Response
1)	FWP depends on partnerships with other state and federal agencies as well as NGO's to fund habitat restoration projects. Programs such as the FWP Future Fisheries Improvement Program are funded by the Resource Indemnity Trust and general license dollars but rely on matching funds from other entities to fully fund restoration projects. FWP is always looking for funding and partnerships to further advance restoration efforts and will continue to foster current partnerships.



Response Number	Response
2)	FWP Fisheries and Wildlife Divisions are coordinating efforts to engage with partner agencies and NGO's to improve riparian habitats and resiliency which in turn may improve groundwater and watershed water storage. FWP recognizes several tools are available to improve habitat resiliency, but not all tools are applicable in all situations.
3)	FWP will continue to work with partner agencies and regulatory authorities to minimize the impacts of resource extraction industries to riparian areas. Mining and timber industries are limited in the work they can do in riparian areas through laws and BMP's that are monitored by FWP and other entities. FWP works individually with other land management agencies and private landowners to limit the impacts of grazing and other land uses to riparian areas.

### **Climate Change Comments**

Six climate change comments were received. Most outlined the importance of moderating water temperatures and limiting expansion of non-native and invasive species.

Climate Change	Comment	Response
	The Aquatic Habitat Program is the bedrock for most other programs. MWF appreciates FWP acknowledging the threat of climate change, the way it may influence water quantity and quality and impact suitable habitat for many fish species.	
	In many places throughout the draft, dewatered tributaries are mentioned. I would like to see FWP work with other government agencies and private landowners to come up with a plan to address those dewatered tributaries. FWP seems concerned with "climate change" and the effect it may have on the amount and temperature of water in rivers. I believe the lower water levels and higher summer temperatures could be partially mitigated if the cooler volume of water from these dewatered tributaries were allowed to flow into the affected rivers. If water users are agreeable to leave more water in the tributaries, this may benefit the river system as a whole	1)
	Third: I encourage FWP to consider the effects of climate change on the upper Missouri River. As average annual water temps in the state continue to rise, I encourage FWP to protect coldwater fisheries where possible, and support warm water fisheries where appropriate.	2)

Climate Change	Comment	Response
	<p>Page 34. States some specific threats to aquatic habitats in MT include: "Climate change with its consequent water quantity and quality changes." - Really climate change? Does not list AIS in this section at all. WHY NOT.</p>	<p>1), 3)</p>
	<p>· Thank you for addressing the drastic effects of the changing climate in Montana in at least a perfunctory way in the Aquatic Habitat Program section. The effects of warming waters are being felt across the state and will have harsh consequences for the cool waters of Northwest Montana. We are seeing the expansion of invasive fish species across our region due to small changes in water temperatures that will only increase in the future. Rainbow trout are rapidly expanding their range in the Flathead Basin due to the effects of small changes in water temperature. Smallmouth bass populations in the Lower Flathead River are expanding into the mainstem Clark Fork and other waters as the water warms. Northern Pike continue to pioneer new waters aided by warmer waters. Perch and crappie populations are growing and invading new waters due to the effects of climate change. All of these invasive species constitute direct threats to our native fish populations. Although there is little that can be done on a local level to mitigate for warming waters, it is incumbent on the Department to take into regard what the future holds for many of our fisheries as our fish populations deal with the effects of climate change.</p>	<p>1), 2), 4)</p>
	<p>Although the SMPG makes several references to the potential for climate change to affect aquatic habitats and threaten Montana fisheries resources, I believe this subject warrants further discussion and elucidation. Scientists have recently been revising the magnitude and predicted timescale of the oncoming changes to hydrology and temperature regimes in the western US. In order for the Department to be able to react and adapt to these effects on aquatic habitats, it needs to explore scenarios of severe or sustained drought and record high temperatures that will stress fisheries resources and force significant shifts in species composition or persistence at low, middle and high elevation habitats. Priorities need to be set for where instream flow protection will be most critical to offset warmer water temperatures, which lentic and lotic habitats will offer the best refugia for imperiled species under altered climate regimes, and how to accommodate the inevitable transition to new recreational fisheries as Montana's rivers and reservoirs experience warming and altered flow patterns. I understand that many of these changes are not entirely predictable. Nevertheless, I think the SMPG needs to contemplate various adaptive strategies that will be needed to address the known threats that climate change will pose to Montana's sport fisheries.</p>	<p>1), 2), 4), 5)</p>

**FWP Response to Climate Change Comments**

Response Number	Response
1)	The Department agrees that improved flows in water and streams may act to buffer increasing temperatures associated with climate change.
2)	Improving flows is expected to mitigate rising temperatures for both warm and coldwater fisheries. FWP will continue to find ways to protect and enhance both warmwater and coldwater fisheries.
3)	AIS and impacts to aquatic habitats are addressed under the Aquatic Invasive Species Program on page 54.
4)	FWP recognizes the risk warming waters pose to range expansion of non-native and/or invasive species which could further jeopardize important native populations and sport fisheries.
5)	FWP will continue to prioritize enhancing instream flows in areas with Species of Concern or jeopardized native fisheries. The Department will continue fisheries monitoring to identify imperiled populations and addressing limiting factors, which may include rising temperatures.

**Water Comments**

Five comments were related to in-stream flow, water quality, and stream dewatering.

Water	Comment	Response
Dewatering	In many places throughout the draft, dewatered tributaries are mentioned. I would like to see FWP work with other government agencies and private landowners to come up with a plan to address those dewatered tributaries. FWP seems concerned with “climate change” and the effect it may have on the amount and temperature of water in rivers. I believe the lower water levels and higher summer temperatures could be partially mitigated if the cooler volume of water from these dewatered tributaries were allowed to flow into the affected rivers. If water users are agreeable to leave more water in the tributaries, this may benefit the river system as a whole	1)
Dewatering	We request that MDFWP manage all fisheries in the state using the best available scientific information, and to use the regulations and laws at hand to enforce compliance by livestock grazers. For example, livestock grazing is repeatedly listed as an impact to fisheries, water quality and soils. FWP should be working to end these grazing allotments for the benefit of fisheries. FWP has been caving in to livestock interests for decades and fisheries, water quality, soils, Bighorn sheep, Bison, Grizzly bears, Gray wolves - to name just a few - all suffer. One wonders why the department isn't	2)

Water	Comment	Response
	renamed MT Dept. of Livestock Grazing because it seems more interested in protecting livestock, than in fisheries and wildlife held in trust for the people of MT. Dewatering of streams is also a significant impact to fisheries the department ignores in favor of livestock grazing. I'm tired of seeing dead trout in the Yellowstone River every summer. With climate change, there is more drought and heat affecting all waterways and resources. The department should be managing water for fisheries, not livestock crops. It is well past time MDFWP begins to manage for the resources in its name (fish, wildlife and parks). Livestock should not factor in. MT has a Dept. of Livestock. We don't need a second.	
Dewatering	Dewatering of tributaries remains one of the most serious issues for the fishery in the Bitterroot River. Rainbow and Brown trout spawn in the lower ends of these tributaries and the river. Native trout spawn in streams on the Bitterroot National Forest. Work with forest on additional FS-state water right evaluation and acquisition.”	1)
In-stream flow	Page 35, under Description of current operations and/or areas of work. Consider including the following additions. • Enhancing reservoir and <u>run-of-river dam</u> management procedures such that the regulation of water flow in streams and water levels in lakes and reservoirs meets not only the owner’s purpose but also benefits, or minimizes impacts to, fish and other aquatic life; • Protecting and enhancing stream flows and lake <u>and wetland</u> levels in priority areas through collaborative community or watershed groups; Also under this bullet we just want to emphasize the importance of state support of partner agencies in the acquisition of instream flow water rights, such as the Forest Service which is able to get state instream flow rights under the MT Water Compact. The Forest Service counts on FWP to process our IF datasets and generate flow-habitat curves that go into our applications to the DNRC. This support is huge and we hope it continues.	3)
Water Quality	Given the separation of responsibilities among the [state resource] agencies, we can't help but wonder if there are opportunities for improved inter-agency coordination, cooperation, priority setting, and funding for restoration projects. A well-coordinated approach would have benefits to overall watershed integrity, including aquatic habitat, water supplies, water quality and fisheries, not to mention Montana's long-tenn economic interests.	1)

**FWP Response to Water Comments**

Response Number	Response
1)	FWP will continue to work with other agencies, water users, and other NGO's to improve instream flow, which in turn leads to improved habitat, connectivity, and cooler temperatures. Tools to improve instream flow include improvement of irrigation infrastructure, leasing water rights for instream flow, and purchasing water rights for instream flow.
2)	FWP will continue to work with livestock producers to reduce impacts to riparian areas and improve instream flows.
3)	FWP will make the requested additions for the final Program and Guide. FWP recognizes the importance of partnerships to protect and acquire water rights and will continue to work with the USFS and other partners to identify and capitalize on opportunities to improve instream flow.

**Tournament Comments**

Three comments were received that were based on fishing tournaments.

Tournaments	Comment	Response
Fishing Tournaments	The scientific data that FWP gathers is great information but, we cannot solely manage our fisheries by scientific data. We need to add the common-sense approach as a management tool also. There is so much more solid data out there that could be utilized, such as results from fishing tournaments. This is real time, accurate information that can and should be utilized by FWP when developing the management plans.	1)
Fishing Tournaments	The Division must revise language pertaining to fishing contests to prevent protest efforts interfering with scientifically sound and publicly enjoyed recreational competition.	2)

**FWP Response to Tournament Comments**

Response Number	Response
1)	All permitted fishing tournaments are required to submit catch information to FWP following their event. This information can aid in fisheries management decisions, especially for waterbodies with a limited amount of fishing pressure or limited creel data. However, tournament data can also be limiting in that tournaments only cover a limited

Response Number	Response
	time period and catch from angling is not necessarily indicative of fish population trends. FWP will continue to require submission of fish information following fishing contests.
2)	FWP evaluates proposed fishing contests based on potential biological impacts, impacts to recreation, and additionally collects public comment to address potential social issues and/or other impacts that were not considered during FWP analysis. If public comments produce compelling evidence of social unacceptance or other issues the Department will work with tournament organizers to address issues or, if unable to satisfy concerns, may prohibit a contest as proposed.

**Monitoring Comments**

Three comments were received concerning fish monitoring.

Monitoring	Comment	Response
Survey Programs	Under the section Monitoring Fish Populations and Ecological Health, MWF would emphasize the need to maintain long term monitoring and survey programs such as the Statewide Mail Creel Survey to measure user trends and capture data on waters not commonly surveyed. MWF hopes that despite the current funding difficulties, priority will be placed on maintaining such programs. In view of changes in personal means of communications, MWF supports the concept of using platforms such as email instead of mailed surveys to improve the survey efficiency and reduce cost.	1)
Monitoring Frequency	Page 11, under: Proactively manage fish and wildlife populations in a transparent and science-based manner, monitoring activities are mentioned. The rest of the document is informed by many of these monitoring activities. Where there are set monitoring programs within a drainage it might be helpful to list how what is the monitoring and at what frequency that is carried out. In the future maybe drainage sections could have a short subsection devoted to this.	2)
Angler Survey	Page 486 -2009 angler survey for MT states 7% fish for walleyes. Why are we using a 10 year old survey? Why is not the recently conducted Missouri River fisheries angler survey data not listed here????	3)

**FWP Response to Monitoring Comments**

Response Number	Response
1)	The mail-based Statewide Angler Pressure Survey will continue to be run on odd-numbered license years. FWP is also working toward re-implementing angler creel surveys on waterbodies across the state and also utilize online reporting tools to gather data on waters with limited angling pressure.
2)	FWP will consider adding a section that summarizes long-standing monitoring programs.
3)	In the 2015 Statewide Angler Pressure Survey 9.56% of respondents reported fishing for walleye. This will be updated in the final Program and Guide.

**Land Use Comments**

FWP received 2 comments related to land use and livestock management.

Land Issue	Comment	Response
Livestock	We request that MDFWP manage all fisheries in the state using the best available scientific information, and to use the regulations and laws at hand to enforce compliance by livestock grazers. For example, livestock grazing is repeatedly listed as an impact to fisheries, water quality and soils. FWP should be working to end these grazing allotments for the benefit of fisheries. FWP has been caving in to livestock interests for decades and fisheries, water quality, soils, Bighorn sheep, Bison, Grizzly bears, Gray wolves - to name just a few - all suffer. One wonders why the department isn't renamed MT Dept. of Livestock Grazing because it seems more interested in protecting livestock, than in fisheries and wildlife held in trust for the people of MT. Dewatering of streams is also a significant impact to fisheries the department ignores in favor of livestock grazing. I'm tired of seeing dead trout in the Yellowstone River every summer. With climate change, there is more drought and heat affecting all waterways and resources. The department should be managing water for fisheries, not livestock crops. It is well past time MDFWP begins to manage for the resources in its name (fish, wildlife and parks). Livestock should not factor in. MT has a Dept. of Livestock. We don't need a second.	1)
Wilderness Areas	Page 12, under Description of current operations and/or areas of work. "Federal law and courts have acknowledged the primacy of states to manage waters in Wilderness Areas." We acknowledge this is	2)

Land Issue	Comment	Response
	<p>an areas of heightened state and federal sensitivity, with agreements out there discussing how should collaborate on fish, wildlife and habitat management. But we also feel this issue is more nuanced. For instance a Supreme Court ruling affirmed the Forest Service’s ability to regulate deer populations in Arizona (Hunt v. United States 1928). Also the Supreme Court in 1991 (Kleppe v. New Mexico) found in a wild free-roaming horse and burro decision that the Federal government could manage wildlife. So it is not clear if the states have primacy over wildlife on all federal lands under all circumstances. We also have found that per the 206 AFWA fish and wildlife management policy and guidelines direction for states and federal agencies and the Cooperative Agreement For Fish, Wildlife And Habitat Management On National Forest Wilderness Lands in Montana, 2008 that the best path forward with fisheries management is best done though good communication and close coordination.</p>	

**FWP Response to Land Use Comments**

Response Number	Response
1)	FWP works with other land management agencies, such as the US Forest Service and Bureau of Land Management as well as private landowners to minimize the impacts of grazing. There is still much work to be done to minimize grazing impacts to streams. The ranching and agriculture industry comprises much of the Montana economy and FWP will continue to work with ag producers to identify opportunities to reduce riparian impacts while maintaining viability of livestock production.
2)	FWP recognizes the potential complexities with working in Wilderness Areas and will continue coordination with federal agencies for work in these areas.

**Other Comments**

There were 16 comments that did not fit into the other defined categories.

Other	Comment	Response
Amphibians	There should also be direction for the management of lakes for the benefit of other aquatic species such as amphibians. An objective to keep the Bitterroot’s fishless lakes fishless may be a useful signal	1)



Other	Comment	Response
	with regard to ecosystem management. Or perhaps referencing a non-game management plan where this issue is addressed in detail.	
Data	Page 16, under Monitoring Fish Populations and Ecological Health. You might consider including a reference or link to MFISH and how some of the data mentioned can be found at this site.	2)
Fish Screens	Page 34: Fish screening on ditch on the Gallatin needed. FWP should work to keep fish out of irrigation ditches.	3)
Fishing Access Sites	Page 49-50: Do not change the name of the FAS program. People know what is allowed at a FAS and changing the name of the program isn't going to accomplish anything. It is a feel good proposal that is meaningless!	4)
Live Bait	Page 19-21: clarify use of live bait and live bait fish.	5)
Other	As a fisherman of all species I think your management plan on walleye has been very biased towards the walleye species Unlimited Harvest of walleye on bodies of water cannot be justified Fish and Game is supposed to protect all species of fish not just one that is politically based! You need to do a better job of listening to your fisherman who fish these bodies of water most of them can tell you the health of a species and the forage for the species. Thank you for allowing my comment that please listen to us all	
Other	WHOEVER IS MANAGING THESE SYSTEMS NEED TO GO GET A NEW JOB BECAUSE THEY ARE DOING A VERY POOR JOB WE HAVE RECORD LOW NUMBERS ON WALLEYE IN 2 OF THE 3 SYSTEMS. I THINK FWP NEEDS TO LOOK DEEPER IN THERE OWN DEPARTMENT AND FIND OUT WHY THEY ARE OK WITH HAVE SUCH POOR WALLEYE FISHING IN THE STATE AND MAKE THE CHANGES THAT ARE NEEDED TO GET THE CORRECT PERSONAL IN TO MAKE MONTANA WATERS GREAT FOR WALLEYE FISH ONCE AND FOR ALL.	
Partnerships	The Divison must draft language concerning public-private partnerships, and include language within water body specific provisions where partnerships where applicable.	6)
Pond Stocking	Page 31: include YCT in statement "As an example, the stocking of rainbow trout in private ponds within tributary drainages that support or are connected to habitats that support westslope cutthroat trout will not be allowed due to the risk of genetic hybridization." Is the reason Yellowstone cutthroat trout are not included in this statement because rainbows are already allowed to be stocked in private ponds within tributary drainages that support Yellowstone cutthroat trout?	7)
Update Information	Page 312, Birch Creek - Swift Reservoir to Highway 358 (species management table): There are also wild Rainbow Trout and Burbot (N) in this section, but they were not mentioned in the species list.	8)

Other	Comment	Response
	Additionally, below highway 358 there are also walleye. We recommend the table be revised to include this information	
Update Information	Page 313, Badger Creek- from Confluence of North and South Badger Creeks to Blackfeet Reservation Boundary (species management table): Species list should also contain Mountain Whitefish (N). We recommend the table be revised to include this information.	9)
Update Information	Page 313, Cut Bank Creek – From the Blackfeet Reservation Boundary to the Mouth (species management table): The lower end of this section contains Walleye, which is not mentioned in the list. It may also be prudent to consider removing Brown Trout due to lack of data supporting it being included. We recommend the table be revised to include this information.	10)
Update Information	Page 21: MCA 87-3-205 repealed and should be removed.	11)
yy Stocking	Page 22, under Hatchery System. Has there been any consideration of the super yy male work being done in Idaho for application in Montana waters to eventually control non-native like brook trout or even lake trout. Does this have any potential for lake trout and smaller lakes in the Swan that have sympatric lake and bull trout population to control or eradicate lake trout?	12)

### FWP Response to Other Comments

Response Number	Response
1)	This management strategy has been implemented in mountain lakes across Montana. FWP is working to keep fish out of historically fishless lakes to preserve the ecology of those systems. <i>Examples?</i>
2)	For sharing fisheries data FWP has transitioned away from MFISH and now uses FishMT. FWP will incorporate discussion of FishMT into the final Program and Guide.
3)	Technology to screen irrigation structures to prevent entrainment of fish has evolved substantially over the past several years. High costs associated with maintenance and decreased irrigation efficiency has compromised use of fish screens in the past, however in recent years there have been effectively designed fish screens that reduce entrainment and require less maintenance. FWP staff will continue to work with irrigators to screen irrigation structures and identify what design options (if any) are most appropriate.

Response Number	Response
4)	Changing the name from Fishing Access Sites to something else (such as "Water Access Sites" or "Water Recreation Access Sites") are potential ways to acknowledge the diversity of users that use the sites and to collect fees from non-angling types of recreators who use the sites.
5)	FWP will add clarification between live bait (such as leeches, night crawlers, maggots) and live bait fish in the final Program and Guide.
6)	FWP depends on partnerships with other agencies, sportsman's groups, watershed groups, landowners, and other interest groups to identify and execute projects to improve fisheries. Projects range from relatively small projects, such as use of Christmas trees for spawning habitat in Canyon Ferry and Tiber Reservoirs, to large scale watershed based efforts, such as those in the Blackfoot and Musselshell watersheds. Partnerships are vital for FWP to preserve habitats and improve fisheries and will continue to be a high priority for the Department.
7)	Westslope cutthroat trout are used only as an example of a type of activity that would not be permitted. Stocking of rainbow trout in a basin with pure Yellowstone cutthroat trout also would not be permitted. This will be reflected in the final Program and Guide.
8)	Species distribution data indicate that low densities of rainbow trout, burbot, and walleye are likely present in the lower portion of this stream section. The final Program and Guide will reflect this change.
9)	Distribution data from the Montana Natural Heritage Program indicates that mountain whitefish are not present in Badger Creek from the confluence of the North and South Badger Creeks to the Blackfoot Reservation boundary. FWP will assist with updating distribution if other information shows otherwise.
10)	It is possible that walleye are present in the lower portion of this stream section, and will be updated in the final Program and Guide. Distribution data from the Montana Natural Heritage Program indicates that brown trout are present in this section of Cut Bank Creek. FWP will assist with updating distribution if other information shows otherwise.
11)	This reference has been removed from the final Program and Guide.
12)	YY stocking refers to genetically altering the sex ratio of brook trout in a hatchery to where male fish only carry the Y chromosome (rather than XY as found in nature). After reproducing in the wild with females (XX) all the offspring will be males (XY). Theoretically after a few generations of all male fish the population will collapse because natural recruitment will cease. This research is in the early stages of use for management applications in Idaho. FWP will continue to monitor the outcome of the program and identify potential uses in Montana.