



## **FWP 2021 Fish Removal Projects**

### **Comment Summary and Response to Comments**

The department accepted public comment on 22 fish removal projects from May 19 to June 3. The department received 209 comments, with 172 generally in support of a portion or all of the proposed projects and 37 opposed or raised additional concerns.

In general, supporting comments encouraged continuing efforts to conserve native fish populations and provide opportunity to fish for native species. Many of the supporting comments also questioned the need for commission review of fish removal projects and questioned the need for review so close to the field season.

Comments or concerns not in support generally included loss of sport fish opportunity for Rainbow Trout, Brown Trout, Brook Trout, or other nonnative species, health and environmental concerns about the use of piscicides, or conducting work in designated Wilderness Areas.

The tables below include submitted comments and FWP's response, if applicable. Full, unedited copies of all comments received during and after the comment period are provided under separate cover. Comments received after the close of the comment period are not included in the tables below.

**COMMENTS IN SUPPORT**

<b>Supporting Comment</b>	<b>FWP Response to Comments</b>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal that are still on hold until the redundant Commission review that Director has put in place, causing these projects to be delayed. All of these restoration projects have already been through an extensive Environmental Assessment process with ample opportunities for public comment. Wild and native trout management is popular and important to Montanans and our economy. Montana's Scientific wild trout management is a world famous success story and needs to be continued.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I support all the fish removal projects with the purpose of native fish conservation. Also the projects to remove Koi and goldfish</p>	<p>Comment noted</p>
<p>Please approve these projects as first written. Let the biologists do their jobs.</p>	<p>Comment noted</p>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal. Years of cooperative work between the State and private sector have been done to design effective programs. There is no reason other than political posturing to delay moving forward. The redundant review that is happening only delays these important and vital projects. Please move forward immediately!</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I am writing to contribute public comment to support non-native fish removal projects and support restoration of native trout. Halting any of these projects would be a mistake, but especially those that have already undergone an environmental assessment.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>If there needs to be a "review of process or policies", couldn't this be more effectively done before these projects are underway, rather than when we are about to launch into the busy season of continuing or starting up these planned, important projects? You are not only impacting many people's livelihoods, you are also interrupting the important work already being done for one of Montana's most precious resource - Native fish (and their streams!). That seems to be a waste of money - to halt mid-project(s). There's got to be a better process and timeline. These native trout restoration projects not only benefit native trout, but also increase stream flows for all water users, CREATE JOBS and economic recovery in our rural communities, and help create habitat for many other species, from bugs and birds to amphibians and wildlife. They also make fishing BETTER for the tens of thousands of Montana anglers and visitors. These projects are NOT a waste of money and provide much value to our state. I ask that you would please make native and wild trout management a top priority, and that you would REMOVE the hold on native trout restoration.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal that are still on hold until the redundant Commission review that Director has put in place. This is patently causing these projects to be delayed and in some instances jeopardized. I find the arguments marshaled to justify the change in long-standing process vapid and unconvincing. At best, it will require the Fisheries Division to submit these proposals to the Commission twice – once for a preliminary decision and again once the project proposal is completed. At worst, it will cause the demise of meritorious projects. As one of the authors of the Future Fisheries Improvement Program enabling legislation and a 50 year supporter of wild and native trout management, I once again urge you to rethink this procedural decision.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

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<p>These types of project typically use the natural organic compound rotenone. The compound is benign to all but fish and some aquatic organisms. This is a great tool to restore native trout populations, which is accepted worldwide. The tool helps to atone for legacy stocking mistakes, the expansion of unwanted/undesirable specie and illegal fish introductions. The tools helps the planet retain some of its natural legacy and the unique evolutionary lineages that have adapted to the landscape over millennia. Perhaps the biggest beneficiary of these action is our Montana State Fish. Don't listen to the dumbasses of the world – keep this tool in the toolbox and go fish for cutthroat trout.</p>	<p>Comment noted</p>
<p>MT is unique in its commitment to wild trout. The package is small but the implications are large. Think long term and support The package.</p>	<p>Comment noted</p>
<p>As adjacent landowners on Cooney Creek immediately downstream from the proposed fish removal project, my wife and I wish to support this proposal. Cooney Creek is one of the few streams with an intact Western Cutthroat population, and also supports bull trout. This project will protect the stream from further degradation.</p> <p>We have observed similar projects in the past carried out by MPG north. They have been carried out carefully and professionally.</p> <p>These folks know what they are doing.</p>	<p>Comment noted</p>
<p>I have reviewed each and everyone one of the proposed fish removal projects and feel FWP's technically qualified people are making the correct decisions to both protect our waters from potential damaging species and removing widely available game species (rainbow and brown trout) to protect native species (cutthroat and grayling). I support these efforts.</p>	<p>Comment noted</p>
<p>I would respectfully ask you to reconsider your recent decision to halt previously approved native trout restoration projects. These projects constituent good scientific management of these important trout populations. These populations of native trout have a very positive impact economic impact on our state. People come to Montana to fish for these trout species. They buy equipment. They hire local guides. They eat and sleep in the state. These have a large positive impact on the state's economy. This activity creates jobs and is valuable to the State of Montana.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I am disappointed beyond mere astonishment by the hold put on native cutthroat restoration in headwaters streams. MT fisheries biologists have long been at the forefront of establishing and maintaining the best wild trout stream fishing in the nation, a resource which brings tremendous numbers of people from across the nation and from many foreign countries. This is a vital source of income for much of the state, both rural areas and our cities. . It is worth noting that the “business members” of Trout Unlimited include over 13% of total nationwide listings for 49 states (Hawaii 0), with Alaska second at 9%. This hold is an insult to our biologists and to most trout fishermen everywhere. The majority of the streams considered are small headwaters streams not easily reached by the public and limited kill rules will have little effect on use. More cutthroat waters will likely result in an increased kill limit for those who do desire a meal. In all areas of the state lakes and reservoirs continue to be well stocked with hatchery fish and easily accessible for families who wish to consume trout.</p> <p>Several times each summer I fish a restored cutthroat fishery where I have also taken out of State visitors. Everyone has regarded this as a very high quality experience. The first half mile is still often fished out with bait containers remaining as evidence but above that the wildlife, scenery, and fishing are superlative. In today’s busy world such waters are fished for many reasons including but not limited to trout, as evidenced by the number of people using our wilderness areas.</p> <p>Creel census reports on our great trout streams, large and small, indicate that a majority of people fish for recreation and retain no fish. The days of sustenance fishing are for the most part gone, fortunately, as the number of people today might decimate the resource. Recreational spending from most Mt trout fishermen and those who come to this state is not due to a longing to eat trout. Also, those who desire that the whole family each kill a limit of wild brookies or rainbows trout are now few in number.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I strongly support all native fish restoration projects.</p> <p>I believe that the decision to pause native trout restoration efforts is wrong due to the economic and biological impacts, and regression that it will cause to the work already in process. I strongly encourage you to reverse this decision before our State loses the progress that so many have worked hard to achieve to date. I founded the Arctic Grayling Recovery Program (AGRP) in 1990. Our focus was to protect and enhance grayling numbers throughout the State of Montana. At the time of AGRP's formation the grayling was petitioned for listing under the Endangered Species Act. Moreover, our recovery efforts became a cooperative effort involving Federal agencies, Montana's resource Departments, Non-Government Agencies, as well as the private sector.</p> <p>That cooperative relationship allowed for habitat restoration projects and land management modifications that greatly improved habitat for both native and non-native fisheries within the Big Hole River, as well as agricultural benefits to area ranchers.</p> <p>Financially, grayling recovery efforts have injected over ten million dollars into Dillon and the surrounding area economies. Local engineers, construction contractors, well drillers, fencing companies, concrete fabricators, nurseries, seed stores, hydraulic and environmental consultants are some of the many companies that benefited from our endeavors. Ancillary entities that profited were motels, restaurants, gas stations and grocery stores. Many of these same businesses will continue to benefit from out-of-state fishermen that travel to the Big Hole to fish for native grayling, the only population left in the lower 48 states.</p> <p>The collaborative recovery efforts in the Big Hole valley have been an economic boon for the surrounding area. Unified neighborly teamwork has resulted in a healthier river corridor, better river flows resulting in fewer fishing closures during the summer, and better habitat for fish. Additionally, there is unprecedented cooperation between your Department and the agricultural community at having successfully prevented listing, and the resultant intrusion of the federal government into the valley. All of this resulted from the efforts to recover a native fish.</p> <p>I have also been involved on several fronts with westslope cutthroat trout (WCT) recovery efforts east of the continental divide. The cutthroat trout is our State Fish. In another example, genetics determined a client in the White Sulphur Springs area had a pure population of WCT on his ranch. This client hired me to establish a recovery program, with the assistance of the local FWP biologist, to strengthen his population's numbers and to replicate that population into waters on public land allowing fishermen to enjoy the bounty. Additionally, genetics from his population were included into other Upper Missouri Basin WCT recovery efforts.</p> <p>I believe these examples illustrate the economic benefits of native fish recovery programs to local businesses, and the fact that non-resident landowners are willing to finance efforts to ensure native fish remain present in Montana waters. Biologically and economically these non-resident landowners are aiding the people of this state. Your decision, if implemented, will negatively affect</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>local contractors and companies that would have gained from their area's scheduled native fish species recovery efforts, and you would be doing this while these companies are trying to recover from the impacts of the pandemic. FWP biologists first identify streams that meet their criteria for native fish recovery. After state and federal impact assessments are met, they remove all non-native fish. This can be done by poisoning or manually removing and transplanting the non-natives through nonlethal means. Electro-fishing is the preferred method, but typically needs to occur for three to four years to ensure the non-natives have been completely removed. Interrupting this stage with a one-year moratorium completely nullifies the previous years' work, resulting in repetitive work and greater costs. Typically, male fish are ready to spawn as early as age two, while females do not produce eggs until age three. It is therefore necessary to introduce eggs for three or four consecutive years to prevent siblings from spawning. If this process is interrupted, a genetic mess occurs which will negatively impact the stream's population and will require much greater efforts to mitigate in the future.</p> <p>I am the past Chairman of the Montana Chapter of the American Fisheries Society and a former Chair of your Future Fisheries Improvement Panel. I am most proud, however, of having been a small business owner in the State of Montana for thirty-seven years, working to improve and enhance Montana's aquatic resources. I strongly urge you to reconsider your planned native fish restoration moratorium, and to consult with your Department's fisheries professionals for further guidance.</p>	

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<p>I'm writing to adamantly oppose the decision to cease ongoing and pending native fish projects throughout the state and shift authority over regional fisheries management decisions from FWP (which has decades worth of experience using sound science to drive decision making), to the politically appointed Commission. Culturally speaking, native fish are the natural heritage of Montana.</p> <p>To the members of the CSKT, the bull trout holds particular traditional importance.</p> <p>Economically speaking, they bring in huge amounts of revenue from angling. Fishing in Montana contributes an estimated \$907 million annually to the state, and a key element of this industry—and what makes Montana unique—is an abundance of wild and native trout. People travel from all over the world to catch our state fish (the Westslope Cutthroat), the jewel of the Greater Yellowstone Ecosystem (the Yellowstone Cutthroat), and in my particular neck of the woods, to pursue the last remaining native population of Arctic Grayling in the lower 48. It's perhaps the most inspiring thing about Montana's coldwater fisheries management and the enduring legacy of Dick Vincent's research which, in 1974 resulted in the cessation of stocking in rivers &amp; streams and an explosion in the interest of wild, native, naturally reproducing trout. Montana is heralded as a model for coldwater fisheries management. it's not just these fisheries or our massive recreation economy that benefit from these native fish projects. It's not only "TU-type groups" who care about them either. Look no further than the upper Big Hole valley, the CCAA program, and the work of my colleagues at the Big Hole Watershed Committee for evidence of the broad reaching benefits of these native fish projects. These habitat projects provide a critical buffer against the indisputable &amp; measurable impacts of a changing climate (declining snowpacks, reduced flow, warmer water temps, etc) and help increase the resiliency of our watersheds in the face of such challenges. As someone who operates a water quality monitoring program on the Big Hole and a human who, like you, depends on clean water, it is also known that these projects often improve water quality. This ill-advised decision puts at risk millions of dollars in funding, delays important time-sensitive projects, and ignores the collaborative work of dozens of landowners, agency employees, funders, and restoration specialists and other stakeholders. Not to mention, many of these projects create jobs in rural areas and are years in the making.</p> <p>It would be a giant step backwards for fisheries management in Montana and I urge you to reconsider.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal that were recently put on hold. Please consider this my public comment in favor of proceeding with the native fish restoration projects recently posted for additional public comment.</p>	<p>Comment noted</p>



Supporting Comment	FWP Response to Comments
<p>Please accept this comment in support of the native fish restoration projects listed on your website. Especially important to the future of rural Montana communities and our outdoor economy is the recovery and resilience of the native cutthroat trout, bull trout and arctic grayling. These are iconic species that draw recreation interests to remote parts of our state. Thank you for your service to our conservation and recreation communities.</p>	<p>Comment noted</p>
<p>Quite frankly, I am confused and disappointed that you have failed to move forward with projects which have already been fully vetted and commented upon. The new administration has set out as one of its cornerstones making government more efficient and responsive to the people of the State of Montana and supporting business growth and development. The delay in moving forward with these projects meets none of those goals. I urge you to proceed with the fish removal projects as already approved.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal that were recently put on hold. Please consider this my public comment in favor of proceeding with the native fish restoration projects recently posted for additional public comment.</p>	<p>Comment noted</p>
<p>I am gravely concerned and troubled about the change of direction in department policy represented by your recent decision to reopen a public comment period and ignore all previously submitted comments with respect to the very important issue of wild and native trout management in Montana. This decision smacks of an attempt to continue to seek comments until a previously determined decision can be supported. All of these restoration projects have already been through an extensive environmental assessment process with ample opportunities for public comment. please understand that this letter conveys my strong support for native trout restoration and scientific management thereof, including all projects for nonnative fish removal that are still on hold until your has been completed.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

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<p>I understand you are seeking additional comments on Native Fish Restoration in Montana. For the record, I support the efforts to increase native species, even if it means removal of non-native fish by the various proven methods that have been used historically. It is my opinion that Montana attracts fishermen (and their associated tourism dollars) because our fishery is world class and is run by adherence to scientific principles. Hatchery fish, for example, are no longer the primary way we stock our rivers, and the fisheries have improved as a result. As an avid fisherman myself, I know that the opportunity to catch a native species is more valuable to me than the chance to catch a rainbow or a brown. Further, the recent pause in such restoration efforts—as I registered in earlier comments to the commissioners—has me concerned in that these effort have already been approved, have the backing of science, and the support of the FWP workers, from scientists to laborers, who began these projects in the first place.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal that are still on hold until the redundant Commission review that Director has put in place, causing these projects to be delayed.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned.</p>
<p>Please continue to support restoration of native fish species. I want to leave Montana a better place for my sons and grandkids. A big part of that is restoring secure populations of native fish species. Montana Fish, Wildlife and Parks has been a national leader in management and restoration of native fisheries. Because of the history of widespread introduction of non-native species, it is sometimes necessary to eliminate those populations in situations which lend themselves to establishing "secure" self sustaining native fish populations. Those proposals that are being considered now have been through extensive, transparent public involvement processes. These proposals have been thoroughly vetted and should be approved.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>It has come to my attention that FWP has halted many of these projects for 'review' recently. I would like to express my grave concern with this decision. First, these are fisheries in desperate need of returning to their naturally evolved conditions. Second, these projects have been well devised, vetted and funded. This funding will be jeopardized by these delays. This, in turn, effects the jobs of many of the people involved in these projects. Third, many of these projects depend on relationships built slowly with the various stakeholders. This delay risks the breakdown of trust amongst stakeholders, and thus the potential future viability of these projects. I will repeat my dismay with this decision. and asked you to explain your rationale for this in respect to both the overall decision and the timing. You explained that this was some regulatory/procedural oversight, requiring sign off by the commission. Could you provide the documentation triggering this change? In an agency that needs a continuum of activity in order to be successful in its management of our natural resources, I am truly concerned that changes in administrations have such a dramatic effect.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I am a resident of Connecticut who makes one or two fishing trips to MT every year. This year I estimate that I will be spending \$6000.00 in Montana on car rental,lodging,meals,guides,flys and equipment, not to mention the license that goes toward supporting your agency. That's why I was very dismayed to learn that your agency is planning to halt the already approved native trout restoration projects and troubled that you would abandon long term trout studies. Such a study is needed to determine why brown trout fish counts have dropped so low in a number of Montana's fabled trout streams. In the past, Montana has been a leader in such activities, which is part of the reason why MT is visited by so many anglers. My home state does a good job of managing it's streams and stocking trout,but, like many anglers, I prefer to fish for wild native trout which CT has in limited numbers. That is why I make the long trek to your state.</p> <p>For the health of Montana's trout fisheries I hope that your agency will reconsider its plans and continue these important programs. They would help protect Montana's wild trout and keep tourists with fishing in mind to keep visiting. After all, WY and Idaho is as close as your state, and Alaska is only a few hours farther by air,</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. There are no plans to "abandon long term trout studies". The Department continues to monitor fish population trends in all of our major rivers and streams. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

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<p>I am an 85 yo lady concerned at the fact that you make public comments difficult - this is the 3rd time I have tried to comment. I still fish (for wild trout with a dry fly) and I always vote. Science based plans to restore native trout in Montana should proceed. you should not (must not) politicize FWP programs. public access for hunting (I don't) and fishing (I do a lot) and just being in the places our state offers for recreation is not only good, it is what keeps is sane. The MT constitution requires that your agency work on behalf of the citizens of the state, the public, and not private citizens who may be politically active/influential.</p>	<p>Comment noted</p>
<p>I SUPPORT THE FISH RESTORATION EFFORTS BEING PROPOSED. NATIVE FISHERIES ARE AN IMPORTANT ASSET TO MONTANA.</p>	<p>Comment noted</p>
<p>I support native trout restoration and scientific management, including all projects for nonnative fish removal.  All of the restoration projects for the 2021 field season have already been through an extensive Environmental Assessment process with ample opportunities for public comment. It is therefore unclear why the Director has required yet another review (and independent public comment period) that just delays them. The explanation “after a review of these projects and statutes pertaining to commission authority, projects that involve fish removal will now have review and approval by the commission” seems to be establishing an extra review process for fish removal projects (even ones already reviewed) which would be a shame from both a time and cost perspective. Taxpayers deserve efficiency in government and we want these projects to go forward. We’ve already commented on these. So what are we doing here?  Whatever the case, scientific wild trout management in Montana is a world famous success story and should be allowed to go forward unimpeded without delay.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I support Native trout restoration!!</p>	<p>Comment noted</p>
<p>I stand in support of native trout restoration and scientific management, including all projects for nonnative fish removal that are still on hold until the redundant Commission review that Director has put in place, causing these projects to be delayed. Scientific wild trout management in Montana is a world famous success story and I am not sure why the Director is changing this process mid stream.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.15</p>

Supporting Comment	FWP Response to Comments
	02; 12.7.1503; 12.7.1504; 12.7.1505
Save the Cuttys. Support native trout restoration.	Comment noted
I hope that FWP fisheries managers will move forward with their projects to remove illegally introduced fish from public and private waters, and remove fish from waters where the goals are to re-establish genetically-pure native fish populations back into their historic drainages. Using chemicals to remove unwanted species should be used if necessary, even in Federally designated wilderness areas.	Comment noted
I urge you to honor the work and commitment already done by your agency and others ant continue with the native trout restoration.	Comment noted
I support fish removal projects to enhance Native Trout.	Comment noted
I am writing to express my full support for projects to restore native trout populations in Montana, including those that require the removal of non-native trout. The history of trout management in this country is a little embarrassing. Not too long ago fisheries managers removed native fish from places like the Green River in Utah and Redfish Lake in Idaho to make room for nonnative trout. Today, millions of dollars are being spent to reestablish those same native fish populations that we removed at great expense just a few decades ago. In Montana, those same mistakes were made, with the intentional seeding of Brook, Rainbow and Brown trout throughout waters that historically teamed with native trout. In addition, more recent "bucket biologist" introductions have exacerbated the challenges faced by native fish, which now share their home rivers not only with other trout but also with northern pike, bass and walleye. Montana is fortunate to support several different species of native trout that provide unique angling experiences for both visitors and locals - Bull Trout, Westslope Cutthroat Trout, Yellowstone Cutthroat Trout, Redband Trout and Arctic Grayling all are native to our state. Unfortunately, most of these species have experienced drastic declines in numbers and ranges over the past decade, and face dire threats from climate change in the future. In many cases the best way to ensure that these species will survive into the future is through projects that remove nonnative trout/fish and isolate habitats from future invasions. To forego the opportunity to restore and protect the unique native trout populations that evolved in the waters of this state risks a repeat of those "embarrassing" fish management decisions from the past.	Comment noted
Please allow Montana ecologists and restorationists to continue efforts based in science. Specifically, I ask the commission to approve fish removal projects that benefit native species.	Comment noted
Please resume the fish removal of introduced and hybridized species with replacement with native Westslope Cutthroat trout. The science is present that these native fish have the best and most cost efficient chance of survival on our	Comment noted

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<p>changing streams. This is especially important in the N Fork of Blackfoot and Swan tributaries.</p>	
<p>I SUPPORT all the fish removal projects proposed in the list that prompted the need for this email.</p> <p>These projects have all had some opportunity for public comment. These projects are designed to remove non native species to help perpetuate native species. Without such treatments it will be impossible to secure the distribution of native species. Without such treatments, most will foster spread of non native species.</p> <p>I am not sure why the controversy within the Dept but it smells of politics. Science...not politics.</p> <p>By the way, I had a career as a fisheries biologist, a Master of Science in Fisheries Management, and was past president of the Montana Chapter of American Fisheries Society.. I continue to fish for and value Montana native fish as most other states have lost most of their native fish or they have greatly reduced distribution. Please stand up for native fish.</p>	<p>Comment noted</p>
<p>It was quite the letdown and shock to hear FWP's 2021 plans for native trout restoration projects is on hold. It serves no positive purpose for me to lament the reason for this delay. However, I am grateful I have the opportunity to communicate my appreciation and support for the efforts of MTFWP to restore native trout.</p> <p>The delay in treating Buffalo Creek in the Custer Gallatin National Forest is but one example of an outstanding fish restoration effort unnecessarily placed on hold. I have fished the Lamar regularly since 1989. Over the course of the past several seasons my own catch experience shows an obvious increase in rainbow trout and rainbow/cutthroat hybrid trout. The effort to identify source points for invasive species is identified, permitting processes are complete, etc. 2021 is a great time to treat and mitigate non native fish populations. If we can't protect one of the greatest native trout fisheries in the world, in a timely and effective manner, what the heck can we protect?</p> <p>Thank you for the opportunity to express my grievance while at the same time show gratitude and respect for the effective work of the MTFWP</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

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<p>In my past life, I've worked as a fisheries biologist for federal and state agencies as well as being on the faculty at Utah State. I'm writing to give some perspective on why native trout restoration projects are critical for the success of native trout in Montana. In the 1990's and early 2000's biologists in the western states were concerned with the decline of native trout all over the west. Here in Montana and Idaho the bull trout was petitioned for listing under the Endangered Species Act and was finally listed as "Threatened". As a member of native trout restoration groups, we all worked to make sure that we could not only recover bull trout but come up with strategies to make sure that populations of Cutthroat Trout like Yellowstone and Westslope cutthroat didn't go the same way. Biologists from state, federal and NGO's put together plans to advance the conservation of these fish and to secure them and their habitat to prevent further listing petitions. By and large those plans have been successful, but with the advent of climate change it is more critical than ever that we move forward to secure more populations of our native trout. That's why I'm writing to ask the Commission and others in MFWP to move forward with these projects. They provide important strongholds for native fish in the face of unprecedented pressures. In almost all cases, the number of partners involved in these projects is substantial and indicates the level of support possible from a broad spectrum of users. Many of these projects are underway or nearing completion. It really makes sense to complete the work that has been started to ensure the future of native trout in Montana.</p>	<p>Comment noted</p>
<p>I believe the FWP Commission should review all projects that require the removal of fish with special attention to removals of fish that currently provide a top quality sport fishing opportunity. For example, I would not support the removal of non-native Brown trout and Rainbow trout from the lower Madison River. These species are not native, but they are well established, and they provide a popular and heavily utilized sportfishing opportunity. In the case of the lower Madison, I do strongly support the program to restore native WCT, and I would add that I have seen a significant increase in the number and size of the WCT in the lower Madison. If a project does not jeopardize an established sportfishing opportunity, it should be OK'd.</p>	<p>The Department does not intend to replace all non-native fisheries with native fisheries, and plans to continue to manage the Madison River as a non-native fishery. WCT restoration efforts in the Madison Tributaries would continue to provide for more WCT fishing opportunity in the main stem.</p>
<p>I am writing to support in the strongest possible terms the continuation without interruption of the ongoing native trout restoration projects in the state.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I was dismayed to see FWP creating new steps &amp; delays in moving forward with Native Fish Restoration projects that are already underway. Renaming these projects as “Fish Removal Projects” in fact calls into question what kind of political game the new FWP leadership is engaging in.</p> <p>All of the projects you have listed on your website as "needing commission approval" have undergone years of study, passed environmental assessments and been approved via historical FWP processes. In addition, many of them have field activities planned in the next few months that this new administrative hurdle could disrupt.</p> <p>I would kindly request the FWP commission approve these projects ASAP! Further, I would kindly ask the commission to direct leadership to focus on moving forward vs. creating new bureaucracy for ongoing projects.</p> <p>Further, can you please educate us on where this requirement for retroactive commission approval of ongoing projects is coming from? I am aware of no new laws or regulations requiring retroactive approval for these projects.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I have written previously about my support for these projects which have already received review and comment. As a Life member of Trout Unlimited who has fished Montana waters since the 1950s, I heartily endorse proceeding with these projects. They are science-based and good for fish and for the economics of our State.</p>	<p>Comment noted</p>
<p>I fully support the process of removing non-native fish species and introduction of native species of fish - again. No matter how much some try to make this process challenging and redundant, my opinion won't change.</p>	<p>Comment noted</p>



Supporting Comment	FWP Response to Comments
<p>I'd like to enter a comment strongly in favor of removing non-native fish and support efforts to restore native populations to their historic ranges. One of the beauties of the American expanse is the diversity of trout and their unique adaptations, both in physical and personality adjustments, that can be encountered across the country. The stocking and subsequent over competition of non-native species has compromised the natural balance and degraded the angler's experience as no matter where they might go in the country they catch the same three fish: rainbow, brown, and brook trout. Restoring native populations will be of benefit to the environment and to tourism in that angler's will be able to once more pursue the many unique species and sub species in their historic ranges.</p>	<p>Comment noted</p>
<p>I strongly support Native Trout restoration and SCIENTIFIC Management of our fish populations, including all projects for Nonnative fish removal that are still on hold until the REDUNDANT, UNNECESSARY and NOT LEGISLATIVELY REQUIRED Commission review that the Director has put in place, causing these projects to be delayed (some of which may not happen until 2022). Do not let unnecessary bureaucratic decisions and turf battles get in the way of the scientific experts/fish biologists opinions within Montana FWP. As we have seen with the latest serious issues on the Madison River and with the State's Brown Trout significant population declines, SCIENCE MUST LEAD THE WAY TO VIABLE SOLUTIONS, not bureaucracy! Montana's fish populations cannot afford any more unnecessary delays.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I am writing to express my support as a Montana angler for the 22 proposed fish removal projects planned for the 2021 field season. Each of these projects will improve the health of Montana fisheries and opportunities for today's and tomorrow's anglers to enjoy our rich fishing heritage. These projects are backed up by sound science and in the case of projects to restore native trout, will uphold the State of Montana's commitment to conservation agreements and recovery plans for these sensitive native species. Importantly, recovering these</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>species is critical to prevent future listing of cutthroat trout under the Endangered Species Act.</p>	
<p>I strongly support ALL of the fish removal/restoration projects listed. The decisions to proceed with these projects in the first place were all based on scientific studies completed by the designated experts and fish biologists within Montana FWP. I have heard that because of this delay in implementation of these projects, some of them will now have to be pushed out until 2022. It is a shame that bureaucratic interference from members of the new State administration has caused this delay. Stop catering to the Outfitters! Let the experts and professionals do their jobs! They know what has to be done to protect our fisheries resources better than anyone!</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I am writing in regards to the commissions outreach for public comments regarding native fish restoration projects. The commission should approve and maintain all of these native fish restoration projects. Native fishes are vital to Montana heritage, recreation, the Montana tourism industry, and ecosystem functions and services. Considering the majority of these projects have already been reviewed and approved following EA's and decision notices the commission approval should adhere to the thorough and scientific process of the EA. Allow the MT Environmental Policy Act do what it was intended for and approve these projects, allow those that have not completed the process to complete it and follow the recommendations of the EA and decision notice. Maintain and protect our native waters and cold water fisheries!</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I would like to recommend MT FWP continue the strong commitment to native fish that has been ongoing for many years. I reviewed the list of proposed projects and support FWP completing all of them. I would like to add additional comment for the NF of the Blackfoot, that project has been many many years in the making and if successful could improve the wilderness experience by providing the opportunity to fish for native fish.</p>	<p>Comment noted</p>
<p>I strongly support any science-based fish removal projects which are conducted for a variety of reasons as established by MT FWP. I assume the fish removal projects on the list for 2021 are established based on scientific principles and management objectives. As such, I support the fish removal process.</p>	<p>Comment noted</p>
<p>can the waters in mt that are pestcided be able to support our native fish? I am sure FW@P ARE ON THE RIGHT ROAD AND FISH CHANNELS TO STRENGTHEN OUR MT WAYS. TKS BOB CAMPBELL. WE/THE AGENCIES HAVE TOO KEEP UP THE GREAT WORK WE ARE DOING.</p>	<p>The waters being treated for native species restoration projects will be able to sustain native fish populations.</p>
<p>The Department should not be stalling 2021 projects that were already planned and underway. Fish removal to promote native species survival and/or reintroduction is a positive and essential practice for the department and should be able to continue without delay, or commission discretion over specific projects. Let the scientists and managers do their work to promote native fisheries without delay or undue interference.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

Supporting Comment	FWP Response to Comments
<p>I am writing to express our support for the conservation of wild and native fisheries in Montana through the use of fish removal methods.</p> <p>Fish removal techniques implemented by professional fisheries biologists and managers are a robust proven and effective method of restoring and conserving native fish populations throughout the world. Fish removals may be used to reduce competition between species, remove undesirable or invasive species, protect species with elevated conservation risk, or to improve the quality of a sport fishery. Removals are often intended to restore or reintroduce native fish to a drainage or to improve an existing fishery. Most removal projects aspire to improve fishing opportunity by reintroducing species better suited for available habitats or by reducing competition with other species. Tools commonly used by FWP for removal include angling regulations, netting and electrofishing, dewatering, construction of barriers, and use of piscicides or chemicals.</p> <p>We urge the Fish and Wildlife Commission to approve the 22 fish removal projects proposed by Fish, Wildlife &amp; Parks to be conducted during the 2021 field season. These projects and projects like these only improve the tremendous fisheries that Montana is known for and enhance the angling opportunities throughout the state.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>. This comment concerns the project in Cooney Creek. I manage a private property on Cooney Creek and am a core participant in the project. The main points I will explain in this comment are:</p> <ul style="list-style-type: none"> <li>• A recent invasion of rainbow trout threatens the genetic purity of cutthroats in Cooney Creek. Competition from nonnative brook trout also harms the cutthroats.</li> <li>• Over two years, we've substantially reduced the number of nonnative fish and seen cutthroats rebound quickly. The cutthroats are abundant and remain genetically pure.</li> <li>• Fish restoration projects should maintain or improve opportunities for anglers and outfitters, and I believe that this project does.</li> <li>• This project is mainly funded with private dollars, and local landowners are in favor of it. It has and will continue to support small businesses and individuals in Montana through direct payment for services.</li> </ul> <p>my organization (MPG Ranch, property in Condon) has worked with other local landowners, MT Fish, Wildlife, and Parks, and the US Forest Service to monitor the fishery in Cooney Creek. The creek hosts a genetically pure westslope cutthroat trout population, one of a very few left in the Swan Valley. The cutthroats are abundant. The creek also contains a small population of bull trout and numerous nonnative brook trout. In 2018, we documented what we believe was the first invasion of rainbow trout into Cooney Creek. Although we were always concerned about competition from brook trout, it was the detection of rainbows that prompted us to act. Rainbow trout can hybridize with cutthroat trout, and once this occurs, the native genetics can disappear.</p> <p>Working with our partners, we completed an Environmental Assessment that proposed removing nonnative fish from Cooney Creek with electrofishing. We began this work in 2019. In 2020, we caught 38% fewer brook trout and 49% fewer rainbow trout, and the cutthroat catch increased by 41%. We estimate that the cutthroat population is now at least 2800 fish in four miles of stream. Even better, we've documented increased recruitment of cutthroats into larger size classes, and they have remained genetically pure. Although bull trout are not the focus of our project, we pay close attention to them because of their threatened status. Bull trout numbers, although low (16 fish each year), have not changed since we began electrofishing. Considering the entire project, we have been successful so far. We have maintained the support of our neighbors by working efficiently, communicating well, and minimizing disturbance. As you can tell, I am proud of this project.</p> <p>Despite our success, electrofishing won't keep nonnative fish out forever. We anticipate the need for a barrier to upstream fish passage in Cooney Creek and will propose that in 2022. Any barrier must allow bull trout passage but keep brook and rainbow trout out. MPG Ranch has hired an engineer with a small private company in Bozeman to design a barrier that meets our needs. If this design is achieved and our proposal is accepted, we will employ local contractors to build the structure.</p> <p>No fish restoration project should fail to consider angler and outfitter opportunity. I am aware of essentially no interest by anglers in fishing Cooney</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>Creek. I welcome them to do so, but public access is difficult, the creek is small, and so are the fish (about 5 inches on average). I am aware of no interest of outfitters in Cooney Creek. Of course, anglers and outfitters are interested in the Swan River. This project benefits them by producing pure cutthroats that can migrate out of Cooney and into the Swan. Vacationers love to catch cutthroats! I support public and commercial interests in fishing, and I like to imagine that anglers in the Swan River catch cutthroats that began their lives in Cooney Creek.</p> <p>We have scheduled work for this year in mid-August, and delays increase the chance that rainbows spawn with cutthroats. The presence of hybrid fish may mean that we lose this cutthroat trout fishery.</p> <p>One final comment: I'd also like to go on the record supporting projects on Red Butte Creek, Smith Creek, and Swan Lake. I sit on the Swan Native Fish Committee, which is involved with these projects. The projects benefit native fish, maintain or improve angler opportunity, offer no barriers to outfitters, and cost little for the state. These strike me as win-win projects for all concerned.</p>	
<p>Native trout are part of our heritage in Montana. I personally fish throughout western Montana, and I often target native trout, such as westslope cutthroat. That these fish can still thrive as a migratory species, without needing to be stocked, is part of what makes Montana a special place. They are the best indicator that our streams are healthy. We need to expand the fishing opportunities for Montana's native trout, not reduce them.</p> <p>Any reduction in funding for Montana's native trout conservation and restoration is unacceptable. Your proposals to reduce funding for native trout and native trout restoration are wrong-headed. Please reconsider your position.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be</p>

Supporting Comment	FWP Response to Comments
	utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505
<p>Decades of work to protect our native fish species is now being put at risk by thinly disguised political attempts at interference and revisionism. The protection of fish and wildlife in Montana should be left to the professionals – not political appointees. Montana FWP has been at the cutting edge of native fish conservation for years, and their current efforts are being emulated by neighboring states and provinces. Delaying or failure to follow the conservation planning and work that has been so carefully researched and put in place will lead to further declines in these species, and their potential listing as threatened or endangered. Such an outcome would not only cost Montana tax payers more money in the future, but the state would lose control over the decision making process entirely.</p> <p>Protect the right of future generations to fish for our native species by approving the use of these science-based conservation plans.</p>	Comment noted

Supporting Comment	FWP Response to Comments
<p>I support all projects on the list that have the stated intent of restoring native fish population, particularly restoration of fluvial Arctic grayling and westslope cutthroat trout, and I urge the commission to approve all projects.</p> <p>Specifically, I want to speak directly to all projects in the Big Hole River drainage. I am the Treasurer of the Big Hole Watershed Committee (BHWC) and we have worked for years to restore fluvial Arctic grayling populations and fight a never-ending battle against Endangered Species Act listing of these fish. The entire Big Hole community has rallied to the cause and many have made personal sacrifices in this effort. Landowners have allowed government agencies to make modifications to their agricultural operations and property to enhance grayling habitat, including riparian fencing, modifications of diversions, reductions in irrigation withdrawals, etc. The sporting public has endured 20+ years of fishing closures during late summer to protect grayling during stressful high temperature, low flow conditions. The standard of the Big Hole closures is far higher than drought closures on other rivers, which has resulted in almost annual fishing closure just to add additional protection for grayling. Outfitters have suffered through repeated shortened seasons. We have all gone above and beyond and made personal sacrifices.</p> <p>The BHWC has gone even further and has real skin in the game.....hundreds of thousands of dollars of project work and staff time have gone not only into the projects described above, but into several of the fish removal projects on your list, including French Creek, Andrus Creek, Doolittle Creek and Selway Creek. The community members of the Big Hole made their sacrifices with the understanding that the grayling populations would be jump-started by reintroductions in the tributaries. FWP made these commitments, now you need to reaffirm this support and commitments.</p> <p>Please approve all of these projects and keep moving forward to support grayling and westslope cutthroat trout.</p>	<p>Comment noted</p>
<p>This is an opportunity to preserve Cutthroat as a pure species. Would that such an opportunity existed in so many other locales and ecosystems. Communities and governments have failed in this regard to their eventual regret. This is a low-cost opportunity to push back one small step against the homogenization of our waterways, not just for anglers but for a future we cannot predict.</p> <p>Please support the efforts of MPG Wildlife to keep Cooney Creek and other watershed creeks in the area free of invasive fish species.</p>	<p>Comment noted</p>



Supporting Comment	FWP Response to Comments
<p>First there is a push by certain political party to restrict voting for political candidates and now there is a push to restrict voting for apolitical fish. What is next!?!? Will there be endless recounts of this collection of comments? More money needlessly wasted because parts of MFWP didn't get the answer that they wanted? Public be damned, they only pay our salaries! Oh, and I bet the SCIENCE (that ugly word) supports native fish restoration. Well,too bad. What does a PHD fisheries biologist know when stood up against a political appointee. You can throw out this comment too since as you will see by my complete name and address that I no longer live in Montana. But when I did live in Montana I lived in Wisdom and fished and caught and released native grayling and cutthroat. Guess I better plan a quick trip back there before that, too, is gone.</p> <p>Restore native fish. It's the right (could be a double entendre) thing to do.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approavls will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>Taking every opportunity to restore native trout is extremely important. Our wild trout management has been the envy of the world for decades and is a big economic driver. Let us continue to use a science-based approach and keep politics out. We owe it to future generations.</p>	<p>Comment noted</p>
<p>I support removal of nonnative fish in Cooney Creek. The project doesn't affect anglers or outfitters because Cooney Creek is small and rarely fished, but anglers in the Swan River watershed will benefit because Cooney will produce many pure cutthroats that can migrate downstream. The project is a private-public partnership, with little expense to the state. We think this project is a win for everyone, and it has been successful so far.</p> <p>I also heartily support the other projects in the Swan Valley, in Red Butte Creek, Smith Creek, and Swan Lake.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>Fish removal projects are necessary in protecting our native species and the 22 fish removal projects that are being proposed have already been approved through all proper avenues. Not approving these projects seems to be doing a disservice to our future generations enjoying the native species we get to enjoy today. Further, with some of the projects already in the works, it seems like a waste of resources, time, and money to stop them without follow through.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I appreciate FWP's continued commitment to restoring Montana's rivers and creeks to fishable populations of historically native species. I've seen first hand how quickly these systems can bounce back when invasive species like brook trout are removed and native cutthroat populations are stocked and allowed to thrive. I hope all of these projects receive commision approval with the condition that the private landowners responsible for stocking their ponds with non native species incur the financial burden of the remediation efforts, not the department.</p>	<p>Comment noted</p>
<p>As a Montanan and an angler, I value our native trout more than any other fishing opportunity in the state. I like browns, brooks, and rainbows. But I can catch them anywhere in the world. From Norway to New Zealand to a half mile away on the Bitterroot. But our natives make this place special. We owe it to the world to preserve these rare species. The least we can do is try to preserve the few havens where they still reside. Please continue and expand native trout restoration projects. Thank you for all the great work you do.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I am writing to express my support for the 22 fish removal projects that MT FWP has scheduled for the 2021 field season. I understand that these projects range from mechanical removals to reduce competition or hybridization risk of native species, piscicide treatments to remove nonnative fish above barriers and reintroduce native species, piscicide and mechanical removals to improve sport fisheries, and piscicide treatments to remove unauthorized introductions of fish, and that of these proposed projects have completed review under the Montana Environmental Policy Act.</p> <p>I am especially supportive of projects designed to conserve and enhance native fish in Montana, especially those related to westlope and Yellowstone cutthroat trout, bull trout and fluvial Arctic grayling. These presence of these fish species in particular act as indicators of the health of Montana's aquatic ecosystems. Conserving them tends to guard and protect all of the important values Montana's watershed provide to the various users of these public resources. Thank you for utilizing the best available fisheries science and conservation practices in the protection of Montana's native fish and aquatic ecosystems.</p>	<p>Comment noted</p>
<p>I am writing to urge FWP to continue the native trout restoration projects that have already had environmental assessments. I also support using science rather than politics or crude economics to guide FWP efforts in all areas. Once our wild fish, animals, and wilderness areas are gone, they will never return, and they are far more important to all Montanans than the profits of the the few and the privileged. Nor should I need to point out that the benefits of healthy creatures, forests, rivers and predator/prey relationships are far more important, both economically and ecologically, than the limited and often selfish profits of special interests.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>Montana Trout Unlimited (MTU) strongly encourages you to approve all 22 fish removal projects planned for the 2021 field season. As a conservation organization with the mission of conserving, protecting and restoring Montana’s coldwater fisheries and their habitats, MTU is very familiar with the many values these types of projects have provided to all citizens of Montana and in the watersheds and communities in which they have occurred for many decades. In that long, successful history of implementing native and wild fish restoration projects, Montana Fish, Wildlife and Parks (FWP) has relied on sound science and well-understood statutory authority to undertake these very types of projects, including the removal of nonnative fish necessary to accomplishing the project goals. For those reasons, MTU does not agree with the new interpretation to approve these projects, nor do we see this as a wise, efficient use of limited Commission time or public resources. Nonetheless, since staff leadership at FWP has decided to put this issue and these projects in front of the Commission at this time, we highly recommend the Commission approve of the projects that are currently on hold, as a one-time effort while the legality, necessity and efficacy of authorizing such projects is fully determined in the months to come. To do any less would be jeopardizing an entire field season and millions of dollars of investment in our communities and the associated benefits to the public resource.</p> <p>Many of the projects in question are time sensitive. Some are ongoing efforts that continue to build on the significant past investment in funding, FWP staff time, partner contributions, and landowner approval. Other projects, such as the unnamed Koi pond in the Bitterroot threaten to spread nonnative, possibly invasive fish species into a watershed highly valued for its native and wild fish populations. Many projects are part of a larger effort to ensure the conservation or restoration of sensitive species, such as our state fish, the cutthroat trout. And, many are part of complicated multi-lateral conservation agreements to conserve and restore threatened and endangered species in their native range. In short, any further delay in most of these projects risks wasting investments of time and funding, risking critical financial investment and job creation opportunities in our communities, as well as threatening detrimental impacts to valuable fishery resources across the state.</p> <p>On the flip-side, MTU’s more than 4,000 members covering 13 chapters in all the major watersheds across the state, as well as many of our business, community, landowner and agency partners recognize the positive impacts that these types of restoration projects have had and will continue to have on Montana’s water quality, fisheries, recreational opportunities, rural economies, and outdoor economy. By quickly approving of this slate of projects in one motion at the June Commission meeting, you have the chance to continue FWP’s contribution to those successes. As you have heard throughout the conversations about wild and native fish restoration</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>efforts, which often include fish removal, these projects provide benefits and increase opportunities for resident and non-resident anglers, guides and outfitters, fishing and outdoor recreation-related businesses, landowners, water users, and conservation organizations, not to mention benefits to wild and native fish populations that cascade into greater ecosystem health and value. As a legal matter, MTU does not agree with FWP’s interpretation of existing statute that removing fish must be separated from the authority to conduct fish restoration efforts, nor the interpretation of statute to require the Commission to approve of fish removal efforts specifically. The statutes FWP has cited certainly allow for the Commission to request informational presentations on any such project and the Commission is well within its statutory rights to comment on any fish restoration project, whether it contains fish removal or not. That can and should all happen within the context of the normal environmental assessment process that these projects go through, including ample opportunity for public comment. Given that these projects nearly always entail abiding by Montana Environmental Protection Act (MEPA) or National Environmental Policy Act (NEPA) review, which is planned and conducted at the regional level of FWP (or partner agencies), MTU sees additional, mandatory Commission review, potentially additional public comment periods, and approval as redundant and an inefficient use of time and public resources. FWP regional biologists and managers, as well as comparable staff with partner agencies, are fully equipped and experienced to be the arbiters of project-level planning, legally binding public vetting and approval. It has been done this way for decades because it works, is the best practice, entails having the most qualified people leading the way, and is perfectly legal under current Montana law.</p> <p>Finally, it has come to our attention that the benefits of restoration projects that include fish removal face opposition by some people or groups who view them as reducing angling opportunities. Nothing could be further from the truth. The long, successful history of these types of restoration projects clearly demonstrates that by removing nonnative or, even, invasive fish species and replacing them with wild or native fish increases opportunity. Wild and native fish are adapted to flourish as self-sustaining populations in Montana’s streams and rivers. As such, these fish, once restored, are often more numerous and have a more diverse size/age class (so bigger fish!) than the nonnative species that were eliminated. Montana’s pioneering native and wild fish policy of not stocking streams and rivers, coupled with the work FWP and others have done for decades to restore native and wild fish make Montana the gold-standard of fishery management around the world. As the situation with the current slate of fish removal projects has come to light, I have received numerous calls from fisheries managers and angling-related organizations outside of Montana expressing their great appreciation for Montana’s policies and programs that make native and wild fish restoration possible. Many people look to Montana and FWP to continue setting the standard for conserving and restoring this state’s unique, geographically and ecologically specific fisheries. That is to say nothing of the interest Montanans and visitors have in maintaining this state’s</p>	

Supporting Comment	FWP Response to Comments
<p>position as THE destination for wild and native trout angling.            We appreciate the opportunity to provide these comments and your efforts to keep up the great fishery work for which Montana is world renown.</p>	
<p>I'm writing in support of restoration projects for native fish in Montana. As an angler and 4th generation Montanan, it's important to me to protect and continue our legacy of stewardship and conservation in our public spaces. It's concerning to me that many of these projects have been put on hold recently. As you are well aware, these initiatives, and stewardship in general, is a long game, and I'd like to encourage you all to continue to honor the native species and the dedication it takes in order to see real change to restore and protect habitat. I'd like to voice my particular interest in the French, Selway, Cottonwood, and Andrus creek projects because of their proximity to where I am in Dillon because that's where I see a need, though I'm sure there are many opportunities around the state to support similar projects.            Thank you for your service and dedication to native fish!</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be</p>

Supporting Comment	FWP Response to Comments
	utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505
<p>I would like to express support for native fish restoration and conservation projects. The 21 proposed 'fish removal projects' for the 2021 field season have undergone extensive environmental review and public comment already, and are vital to the continued conservation of our native trout.</p> <p>Montana is home to some of the healthiest and prized native trout species, which brings tens of millions of dollars annually to our state and local communities. Our waters are warming and habitat is changing - it is up to us to acknowledge our changing ecosystems and take action to better protect our native species.</p> <p>For example, recent US Geological Survey results show [nature.com] that 'projected rising temperatures and reduced spring precipitation could increase hybridization between trout species and reduce the availability of cold water habitats for cutthroat, leading to further population declines.' By mid-century, the decline in native trout in the Flathead River could cost Montana an estimated \$5 million per year. This is happening all over our great state.</p> <p>Furthermore, the sheer amount of illegal introductions of non-native game species is very concerning. We need solid policies and plans in place to protect the native species that have evolved here over time to thrive in our blue ribbon trout streams to dissuade 'bucket biologists' from creating non-native fisheries that lose the unique, natural and highly sought after Montana trout experience.</p>	Comment noted
<p>Please work to maximize the number and extent of projects slated to restore native fish, prioritizing biologic and ecologic hot spots that may be lost if we don't act now. Native fish are part of our state's (or nation's, our world's) legacy and should be retained rather than driven out by non-native species.</p> <p>In addition, please focus projects on habitat protection, because if the habitat, which includes guaranteed in-stream flows, is lost, the loss of native fisheries quickly follows. As such, please make sure each project includes -- if applicable - - work with, and partnership with, local land owners who can become champions for FWP efforts on behalf of native fish.</p> <p>Please do <i>*not*</i> prioritize the wishes of guides, <i>*some*</i> of whom may be lobbying for retention of non-native species to maintain their businesses of relying on a public good to make money. Someone's private business interest is not a compelling basis for fisheries management decisions.</p>	Comment noted

Supporting Comment	FWP Response to Comments
<p>Please fund and authorize all projects that MTFWP fish biologists are confident will restore native fish populations. Recovery of Westslope Cutthroat, Bull Trout, and Arctic Grayling throughout their native range should be MTFWP's highest fish management priority.</p>	<p>Comment noted</p>
<p>I would like to voice my concerns over these proposed native fish programs purportedly being stopped. As a biologist who worked for the US Forest Service in Montana for over 25 years and was intimately involved with developing early native fish programs, I know professionally how important these programs are. It is not appropriate that these programs be curtailed, in fact, they should be increased. Whatever issues there are should be addressed, but the basic programs need to continue.</p>	<p>Comment noted</p>
<p>Maintaining and expanding the populations of the Montana native fish is so crucial to keep the beauty and tourism in our state. Please do whatever you can to help expand the native trout populations.</p>	<p>Comment noted</p>
<p>I am all for your native fish restoration projects that you have planned. Keep up the good work!  As a side bar, I would like to add that a previous project done on Cherry Creek has been a great success. Not only can you catch westslope cutthroats in Cherry Creek, but you can also catch them in the Lower Madison River!  Thanks for taking my comment. I appreciate all the work that everyone is doing to make this a success.</p>	<p>Comment noted</p>
<p>I am writing in support of native fish restoration projects. These species need more strongholds and places to exist without competition from non-native species.</p>	<p>Comment noted</p>
<p>We all know we have a new director of FWP that is more focused on hunting and MOGA than what's right for our Montana fisheries, but for those of us that enjoy guiding/ outfitting/ and recreating not only big game but also on our rivers the thought of stopping native fish restoration projects in MT is mind blowing. To suspend all the work this side of the state has worked so hard to enhance is mind blowing. What is the reason? So Walleye and other non-natives can take hold? Grayling are finally on the rebound in the Bighole, after nearly being listed several years ago, and you are going to put them at risk of once again declining? Trout numbers across most of Montana's rivers have declined, with not one answer for it, yet the good work our biologists are currently working on to enhance habitat and improve recruitment needs to stop? We need answers and I am strongly recommending you change your mind about suspending these projects particularly as the construction season is just kicking off. Start doing what's right for the majority and not the squeaky wheel.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-</p>



Supporting Comment	FWP Response to Comments
	1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505
<p>I will try tackling the use of poison rotenone to remove nonnative fish</p> <p>Rotenone used in fish recovery has never affected an ecosystem except to restore it. And it has never killed a turtle, snake, frog, bird or any terrestrial organism. Aquatic insects usually survive treatment, and the few that don't are swiftly replaced by natural recruitment. In fact, insects frequently do better after treatment because they don't have to contend with fish they didn't evolve with. It's harmless to all mammals including humans.</p> <p>Rotenone is a safe and quick way to bring back native fish and has been proven to work in many other projects.</p> <p>Rotenone is an organic compound made from the root of legumes. Grinding the roots into a powder, drying them then adding water produces a chemical that blocks oxygen uptake of gill-breathing organisms.</p> <p>Rotenone has minimal effect on Macroinvertebrates and amphibians and they actually explode in population do to the absence of nonnative fish that prey on them.</p> <p>Rotenone kills any gill-breathing organism and is harmless to all other animals. Rotenone is 100% biodegradable and disappears from the stream fast after applied. It's the best way to ensure native fish thrive for future generations.</p>	Comment noted

Supporting Comment	FWP Response to Comments
<p>I can say with confidence that I fully support all the projects proposed for fish removal and native fish restoration. All these projects would be incredibly beneficial to bringing back native sport fisheries.</p> <p>More native fish means more opportunities to fish for our heritage fish such as native cutthroats and Arctic grayling. The return of native fish also means our ecosystem is back in balance.</p> <p>Restoring native fish species and removing nonnative fish species should be FWP top priority as it will result in a more balanced watersheds.</p> <p>Nonnative fish pose the most threat to our native fisheries. Rainbow trout will hybridized with native cutthroat trout populations and cause native cutthroats to disappear in their native watersheds. Brook trout will out compete native trout in small tributary streams, brown trout prey upon young Grayling and cutthroat trout, and Lake trout eat the young native cutthroats in Lakes causing population crashes in our native trout species.</p> <p>Fish, Wildlife, and Parks needs to start removing nonnative invasive fish species such as rainbow trout from our rivers by any means necessary such as electro fishing, Rotenone, or netting.</p> <p>I fully support all projects including Doolittle Creek, Shields River, French Creek, NF Spanish Creek, Selway Creek, Cottonwood Creek, South Fork Sixteenmile Creek, Reser Reservoir, Flathead River Tributaries (7 tributaries), Cooney Creek, Red Butte Creek, Smith Creek, Swan Lake, Martin Creek, NF Blackfoot, Unnamed Koi Pond, Bitterroot Valley, Andrus Creek, Unnamed Private Pond in Bridgers, Brushy Fork, Buffalo Creek, Arapooish, Unnamed Pond, near Zortman.</p> <p>I hope to see that all of the projects that FWP has listed goes through and I want FWP to prioritize native fish restoration in the state of Montana.</p> <p>Fish removal projects for nonnative fish should be mandatory because nonnative fish don't belong in Montana.</p>	<p>Comment noted</p>
<p>I support the proposed fish removal projects.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I well remember when MT FWP biologists first announced plans to cease stocking a four mile portion of the Madison River. despite serious public opposition. Several members of the appointed commission announced that when the project failed they would expect resignations of the involved biologists. Older MT residents know that test area, through natural reproduction, showed a catchable size trout population increase of 200 to 400 percent through the four miles, including increased average size. O'Dell creek, which had not been previously planted due to a healthy population, received annual stocking during the trial period and the number of catchable trout dropped from 515 trout per mile to 280. Twenty years later I talked to a biologist about the last fish stocking in the local stream, which was monitored weekly. They found that in two months all the stocked trout were gone; washed downstream, died, caught, eaten, whatever, with the only positive being a notable weight gain by a few really big old brown trout. My point is that biologists went on despite vocal opposition by an ignorant public and their political representatives, and began to earn national respect for policies which have resulted in the best trout fishing for wild stream trout in the lower 48 states. Now we are back to political control for unclear and foggy reasons, especially as the suddenly controversial waters are primarily headwaters streams which do not experience a great deal of public use. Most of those who catch trout for consumption visit the nearest of many reservoirs with stocked trout placed there for exactly that purpose.</p> <p>A special concern among the projects on hold is the Buffalo Fork of Slough Creek, The latter is one of the most famous of Yellowstone Park streams, and countless people have written for over a century of fishing it for large native Yellowstone cutthroat. One rarely fished tributary continues to threaten those native fish with introduced rainbows, but somehow its small rainbows have acquired more importance to a few people than all the large native cuts downstream.</p> <p>I strongly urge allowing our widely recognized MT FWP fisheries biologists to continue the wise and professional management of our very special resources.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

Supporting Comment	FWP Response to Comments
<p>As both a scientist and fly fisherman, I encourage the Commission to support projects that enhance native fisheries both for conservation and recreation. A healthy native fishery is also an exciting and unique recreation opportunity. One that is becoming increasingly rare in Montana today.</p> <p>Our native fisheries need help and removal non-native species, when done responsibly and by technical experts, is one option that is often used to reclaim the highest-value native fisheries. A healthy and vibrant native fishery far outweighs the temporary reduction in recreation opportunities. The opportunities for recreation in streams with non-native fish far outweigh the opportunities for recreation in areas with only native fish. Please make decisions that expand native fish recreation opportunities.</p> <p>The current processes in place to develop a fish removal project provide effective review of the project technical specifications and sufficient public commenting opportunities. Public commenting by project stakeholders, those living, ranching, and fishing in the area, via NEPA and MEPA reviews are taken into consideration in final project determinations and have in the past resulted in alternative approaches to fish kill projects.</p> <p>Therefore, I believe the Fish and Wildlife Commission should not have approval authority over fish removal projects. Additionally, those projects that have already moved through the NEPA or MEPA process should not be stalled, postponed, or halted by the Fish and Wildlife Commission.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I strongly support all these native fish conservation projects. They are the right thing to do and help diversify our angling opportunities. Some wrong headed people believe these projects reduce angling opportunities and economic benefits of our state's fisheries, but they are wrong.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I'm writing in support of the fish removal projects under consideration, particularly those that are already well underway and or well along in various stages of diligence &amp; approval (EAs completed, comment/permitting completed, previously approved). In particular, it is critical that projects that are already underway (having already gone through approval processes) be continued, as they have already been thoroughly vetted (including public support), with a great deal of planning and/or resources already expended. Further, their effectiveness in removing non-native species to conserve and/or restore native fish populations can be disrupted or reversed if not completed on the current timeline (or they would become more expensive to complete, wasting already vetted public resources). Those projects include ones like Red Butte Creek &amp; Cooney Creek, North Fork Blackfoot, Martin Creek, and Andrus Creek, among others. Ultimately, these projects aim to restore Montana's native fish species, for which we are famous worldwide- in addition to being part of our way of life, these species are part of what makes Montana such a sought-after destination. Please support the continuation of this work through approval.</p>	<p>Comment noted</p>
<p>While I appreciate the response from the director regarding my email I continue to have doubts about the "new" review process for native fish restoration projects. This appears to be nothing more than an attempt to come up with an answer to questions that have already been answered for the benefit of native species and both residents and visitors to Montana.</p> <p>I question the statement that this new process is in response to questions from "lawmakers and interest groups." Given the tenor of the recently completed legislative session I can't help but feel that the questions from lawmakers constitute a continuation of the efforts to substitute political solutions for issues that are best decided by the professional wildlife managers working for and with MT FWP. Interest groups in these situations often are composed of those who oppose fish removal projects in general as well as opposition to the removal of populations of introduced species because they are "better" than what was here originally.</p> <p>I am hopeful that this new process will result in reaffirmation of the decisions reached in the initial reviews of these projects. But, I continue to ask why do this all over again?</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>

Supporting Comment	FWP Response to Comments
<p>I am writing to comment in support of the plan to remove non-native fish populations in some streams and replace them with native populations. I am a 44 year resident of Montana and an avid angler who fishes over 75 days a year in the state.</p> <p>Native fish species are an irreplaceable asset in Montana. In many streams they have been outcompeted for habitat by non-native species. As climate changes continues to warm our waters it becomes critical that native fish species have streams where they can thrive without competition from non-native such as brook trout. Therefore I support removal of non-native species in the identified streams and replacement with native cutthroat trout.</p>	<p>Comment noted</p>
<p>I support the proposed projects to remove invasive and non-native fish to improve populations of MT native fish species.</p>	<p>Comment noted</p>
<p>As a Montana businessman dependent on healthy river systems, I support native trout restoration and scientific management, including all projects for nonnative fish removal that are still on hold. Please move forward with these projects.</p>	<p>Comment noted</p>
<p>Rotenone used in fish recovery has never affected an ecosystem except to restore it. And it has never killed a turtle, snake, frog, bird or any terrestrial organism. Aquatic insects usually survive treatment, and the few that don't are swiftly replaced by natural recruitment. In fact, insects frequently do better after treatment because they don't have to contend with fish they didn't evolve with. It's harmless to all mammals including humans.</p> <p>Rotenone is a safe and quick way to bring back native fish and has been proven to work in many other projects.</p> <p>Rotenone is an organic compound made from the root of legumes. Grinding the roots into a powder, drying them then adding water produces a chemical that blocks oxygen uptake of gill-breathing organisms.</p> <p>Rotenone has minimal effect on Macroinvertebrates and amphibians and they actually explode in population do to the absence of nonnative fish that prey on them.</p> <p>Rotenone kills any gill-breathing organism and is harmless to all other animals. Rotenone is 100% biodegradable and disappears from the stream fast after applied. It's the best way to ensure native fish thrive for future generations.</p>	<p>Comment noted</p>
<p>Urge you to complete all 22 projects that are scheduled for this year.</p> <p>Native fisheries are critical to Montana and only enhance this state's and your department as the leading agency in the United States and the world in restoring native fisheries, maintaining and enhancing them.</p> <p>All of the projects a</p> <p>Have a ready went under extensive environmental review along with public comment.</p> <p>Not doing the projects will waste tax payer dollars and do nothing to enhance native fisheries.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>My more accurate sentiment is why is FWP making approval of these fish removal and restoration projects an issue for the Fish and Wildlife Commission. For decades Montana Fish, Wildlife, and Parks has managed one of the world's preeminent fisheries. The fisheries of Montana rival the very best in the world. The projects being reviewed have been well vetted by scientific and management professionals. Most of them have gone through extensive review pursuant to the Montana Environmental Policy Act. Restoration of native fish species, using all the sound management and research tools in the tool box, has been going on for years to the betterment of Montana's fisheries and undoubtedly its reputation as a destination for visiting and resident anglers. That translates to major economic benefits for Montana's businesses and citizens.</p> <p>The project under consideration should be approved pursuant to the existing process and not clog up the deliberations of the Fish and Wildlife Commission. FWP's actions create a problem where none exists and a new process where none is needed.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505</p>
<p>I am writing to strongly approve of all 22 fish removal projects slated for this year(2021) by Montana FWP. Invasive species are one of the worst problems affecting our streams and waterways and mitigation efforts to bring back our native fish species are very important. I have lived in Montana for over 30 years and applaud the professional and hard work of FWP I've observed during this period. Please continue with this important work!</p>	<p>Comment noted</p>
<p>I'd suggest you consider how many non residents will stop coming to Mt. to fish if a stoppage of this work results in a diminished experience. I spend \$5-6k/year in Mt because you have a quality fishery. Don't be fooled into thinking all the tourism dollars are a given.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I support all of the fish removal projects which are an integral part of Montana’s native fish restoration efforts. All of these projects have been carefully designed to protect, enhance or restore native fisheries, or to otherwise enhance fishing opportunities. Montana has world-renowned native fish populations which make it a highly-coveted destination for anglers, but these native fisheries face multiple pervasive threats from non-native species.</p> <p>I am most familiar with the projects in the Swan Valley which will help restore native westslope cutthroat and bull trout. Removal of non-native fish in Cooney Creek, Red Butte Creek, Smith Creek and Swan Lake will not significantly diminish fishing opportunities for brook or rainbow trout in the Swan Valley but it will enhance fishing opportunities for native fish and improve the resiliency of their populations.</p> <p>The protection and restoration of Montana’s unique native fisheries is well worth the effort and cost of these removal projects. Once lost, genetically-pure native fish populations can never be recovered. These fish represent a valuable component of Montana’s natural heritage. We owe it to future generations to sustain this unique resource.</p>	<p>Comment noted</p>
<p>I’m writing to you today to make you aware that I very deeply care about the protection of native trout species in Montana, and for that matter native species everywhere. I support all native trout restoration and scientific management, including all projects for nonnative fish removal that are currently on hold and hope that you will reconsider and let these projects move forward. One of Montana’s true treasures are our native Trout species.</p>	<p>Comment noted</p>
<p>I write to urge you to support native trout restoration and scientific management, including projects for nonnative fish removal. Trout restoration and scientific management are critical for preservation of our trout fishery, which is in turn critical to the significant recreation economy in Montana.</p>	<p>Comment noted</p>
<p>I'm writing to convey support for the fish removal projects currently under consideration, particularly those that are already well underway and/or well along in various stages of diligence &amp; approval (EAs completed, comment/permitting completed, previously approved).</p> <p>Projects that are already underway (having already gone through approval processes) ought to be continued as they have already been thoroughly vetted (including public support), with a great deal of planning and/or resources already expended. Further, their effectiveness in removing non-native species to conserve and/or restore native fish populations can be disrupted or reversed if not completed on the current timeline (or they would become more expensive to complete, wasting already vetted public resources).</p> <p>Those projects include ones like Red Butte Creek &amp; Cooney Creek, North Fork Blackfoot, Martin Creek, and Andrus Creek, among others.</p> <p>Ultimately, these projects aim to restore Montana's native fish species, for which we are famous worldwide- in addition to being part of our way of life, these species are part of what makes Montana such a sought-after destination. Please support the continuation of this work through approval.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA</p>



Supporting Comment	FWP Response to Comments
	87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505
Please continue to place a high priority and continue funding for these projects to protect Montana's native and iconic fish.	Comment noted

Supporting Comment	FWP Response to Comments
<p>As the former Bull Trout Coordinator for FWS (now retired and presently speaking only for myself) I am somewhat perplexed by the recent turn of events involving Commission re-consideration for approval of a number of projects that have been years in the planning stage and had multiple levels of review. I listened to the discussion during the May work session and it raised a couple of questions. The Department appears to be implementing a two-step process whereby the Commission first screens proposals in their early stages and issues an “endorsement” (your words) of projects they see as worthwhile. This “endorsement” then ostensibly authorizes FWP to proceed on a more intensive MEPA review and associated public comment. Then, as I understand it, the projects must be resubmitted for final Commission approval. What is entirely unclear is what becomes of projects that are “not endorsed”. Can they be modified and/or further clarified and resubmitted for “endorsement” after concerns are addressed, or are they dead on arrival. Furthermore, does the “endorsement” become the official Department position so long as the project submitted for final approval meets whatever conditions are attached to it, or does negative comment from the public have the potential to scuttle a project that was previously “endorsed”? It seems like a flow chart explaining this whole two-step process is badly needed in order to assure the applicants that the approval process is fair and evenly applied.</p> <p>Returning to my earlier discussion, it’s rather hard to accept the premise that projects involving partnerships and/or non-FWP departmental funding sources, for example those with barriers constructed that may cost tens of thousands of dollars or more (with existing MEPA or NEPA completed, sometimes several times) now have to begin at Step One in the Commission endorsement process. This is particularly true when the funding sources are primarily or exclusively non-FWP. An example is the FWP Region One BPA Mitigation Program that has a nearly 40- year successful track record of mitigating for the loss of native bull and cutthroat trout. The staff is dedicated to that purpose and BPA will not and should not allow that funding to be diverted into management of nonnative sport fisheries.</p> <p>Similarly, the North Fork Blackfoot project has already had several steps of public and environmental review and has even been approved by the Director of FWP and the Regional Forester should not be expected to be subjected to what seems like a rather arbitrary two-step FWP Commission endorsement process. I am concerned the Commission is overstepping their authority. Perhaps this Commission should consider some such projects to be grandfathered in and ready for considering final approval.</p> <p>It is no secret that Native Fish restoration projects are sometimes controversial. But, it’s also evident that rampant illegal expansion of nonnative fish has been occurring for decades, especially in FWP Regions 1 and 2. There are literally hundreds of documented instances of bucket biology introductions of game fish including bass, walleye, crappie, northern pike, and lake trout as well as several more nongame species. The relatively small number of restoration projects that are scientifically developed to partially stem this tidal wave of destruction of our native fish communities. To submit them to the whims of angler popularity is to</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. The Department will be working on a process for the endorsement and approval process with the Commission, your reference to development of a flow chart is noted and may be a useful tool to help all understand the new process. If projects are not endorsed or approved by the Commission it will be done publicly during the Commission meeting and presumably the Department will be provided guidance in terms of can the project</p>

Supporting Comment	FWP Response to Comments
<p>abrogate the State of Montana’s responsibility to protect and conserve native fish, especially iconic westslope cutthroat and bull trout.</p> <p>Which brings me to my final subject. I was involved in the planning and execution of the experimental lake trout suppression project that occurred over nearly a decade in Swan Lake, between 2009 and 2016 (see Fredenberg and Rosenthal 2018 for summary). For a variety of reasons, foremost among them the lack of a dedicated funding source and the steep learning curve we faced in developing successful lake trout control methods, the project was eventually terminated. But, the problem has not gone away. As a Threatened Species, Bull Trout are in jeopardy and there is continuing interagency dialogue but precious little on-the-ground recovery action.</p> <p>The Swan Lake project does not belong on the list currently before the Commission because there has not yet been a formal proposal to move forward with recovery actions (be it gill netting, embryo suppression, and/or other techniques in some combination). The USFWS, in coordination with USFS and FWP is developing an EA which will go out for public review and from that a formal proposal may be developed for action. Until that occurs, there is no one that can answer critical questions the Commission may wish to ask prior to “endorsing” or “not endorsing” the project. I would respectfully suggest that this project does not belong before the Commission at this time and should be withdrawn for future consideration.</p>	<p>be adjusted and resubmitted or considered for approval at another time.</p> <p>MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008.</p> <p>ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>I would encourage you to vote for approval. I know it’s not perfect, &amp; everyone won’t be+happy with it. A pure cutthroat fishery is a joy. One that I have fished is the Elk River in British Columbia just North of our border. It is a tributary to the Kootenay. I am also familiar with the success on Soda Butte Creek at Cooke City, MT. ADDITIONALLY , if we can maintain &amp; increase cutthroat fisheries here, there will be less chance of them being listed as “endangered species”. That could be detrimental to other industries in Montana such as farming, ranching, road maintenance &amp; building, &amp; growth in general. Go for it !!</p>	<p>Comment noted</p>
<p>Here I am, gladly jumping through another hoop to have my voice heard about stopping research for cutthroat trout. I would urge you to continue this research immediately and do your silly review while it's on-going. Make a logical decision. And if the director and deputy director can't figure out how to make a folder in their email for this subject, maybe they need a lesson on how computers work. Your boss started a tech firm, maybe ask him</p>	<p>Comment noted</p>

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<p>By way of background, I have direct experience with regards to native fish in MT, having conducted research on the migratory behavior of bull trout in the Blackfoot River in the 1990's for FWP while completing my Master's degree from UM.</p> <p>I can speak with relevancy to the projects slated to occur in the Swan Valley, specifically those in Cooney, Red Butte, Smith and Martins creeks. Efforts there to remove brook trout and rainbow trout, which are ongoing, have a demonstrably positive effect on the populations of west slope cutthroat trout. This native fish faces a list of pressures across its range, but in these streams the habitat is good, the temperature regime is good, the water availability is good, but the presence of fish which can hybridize and compete for food and space with west slope trout shows itself to be a persistent threat. Non native fish removal in these streams is a very targeted and effective means to reduce this threat. For this reason I support these efforts, as would, I hope, the commission.</p>	<p>Comment noted</p>
<p>Please don't cut funding. Do what's right. You cannot reverse the results if you do.</p>	<p>Comment noted</p>
<p>I am writing my support for all fish removal projects in the State of Montana when such projects are intended to remove non-native fish species and restore native species such as westslope and Yellowstone cutthroat trout, bull trout, and grayling.</p> <p>As a fishing outfitter (MBO License #5981), I have always been a staunch advocate for preserving native species. I have fished and outfitted in Montana, Wyoming, and Yellowstone Park for over 30 years and have seen substantial declines in native cutthroat fisheries. There are plenty of rainbow, brown, and brook trout globally; however, all subspecies of cutthroats face increased challenges to their survival, and other subspecies have already gone extinct. I strongly believe that state and federal agencies must be dedicated and focused on saving these special native species by removing non-natives from historic cutthroat habitat, reintroducing native subspecies of cutthroats in their historic range, and also expand native subspecies range by introducing them into previously fishless waters above waterfalls in headwaters streams.</p> <p>As an outfitter with a scheduled 7-day pack trip in September, partially on Buffalo Creek north of YNP, I would prefer that this project is delayed one more year. However, I believe the project should move forward in 2022 once the USFS finalizes its EAS/EIS. This will allow outfitters with trips scheduled in 2021 to operate unaffected while allowing us to make alternative plans in the future until the Yellowstone cutthroats have re-established a reliable sport fishery.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. If approved in June the Buffalo Fork project will proceed which will involve field work in 2021 that is essential for project pre-</p>

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	<p>planning however, the actual piscicide treatments will not occur until 2022. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>Hello, as a fly angler, one reason that I have traveled to Montana is the opportunity to fish for native species in their native habitat. Please do not cut funding for these native species, it would harm the great efforts of the last few years, plus give anglers to go to other western states who value their native species.</p>	<p>Comment noted</p>

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<p>. I am a fisheries biologist for a private land management and conservation organization that has had the distinct pleasure of working closely with the top notch professional men and women of Montana Fish, Wildlife and Parks on several fish removal projects over the past two decades. These folks know their stuff and represent your agency very well. I am hopeful that the Commission recognizes the thought, planning, science, and effort that goes into selecting, developing, and implementing a fish removal project and will show great deference to the recommendations of your biological staff when providing final approval for these and future fish removal projects. Region 3's status review of and conservation priorities (e.g. work plan) for westslope cutthroat trout are an excellence example of the due diligence that is performed before a fish removal project is proposed at the field level. Given the effort required to successfully implement a fish removal project it seems illogical that MTFWP fisheries staff would recommend a fish removal project that did not have statutory or policy justification, sensitive or native species benefits, positive fish management or restoration outcomes, and/or important social and cultural implications. Many of these projects are intended to improve the status of Montana's native fishes. I am intimately familiar with Region 3's NF Spanish Creek project as I have worked on the project in collaboration with MTFWP since inception. This project will significantly improve the status of westslope cutthroat trout in the Gallatin River drainage. Projects like these can do much for a species both biologically (e.g, improved status) and socio-politically. I have personally been involved in native species work where the US Fish and Wildlife Service purposefully chose not to list a subspecies of cutthroat trout because of the conservation and restoration work being done on the ground at the state and local level. I encourage you to support the good work being done on the ground for Montana's fishes and approve the roster of fish removal projects. Similar consideration of your professional staff's recommendations (e.g., proposed projects) should carry into the future.</p>	<p>Comment noted</p>
<p>I can't speak for the entire state, but as a Region 1 resident I have read the synopsis of the fish removal projects slated for this region and I wholeheartedly support them. I firmly believe they are in the best interests of our native fish and, ultimately, the fishermen and the State of Montana. Please approve these projects so that they may move forward.</p>	<p>Comment noted</p>

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<p>Montana has long been a worldwide destination for anglers looking to fish for wild trout in our beautiful and publicly accessible state. Many biologists, scholars, and conservationists point to landmark work done in the 50's by FWP biologist Dick Vincent that proved that stocking hatchery fish in rivers with wild fish populations was detrimental to the native wild trout's growth and viability. As the primary stewards of Montana's incredible Wild Trout populations and the agency responsible for maintaining and growing this priceless resource, FWP should be taking all steps forward with the 2021 project season. Putting these projects through another round of review when they have already been fully vetted and approved under the existing rules is an affront to the biologists and personnel who worked so hard to shepherd these projects through the necessary steps and get them approved and in some cases, started prior to this freeze.</p> <p>Frankly, I am flabbergasted at the gall of the new FWP administration in calling these projects into question. It is readily apparent to anyone paying attention to the May 18th meeting that Becky Dockter was sent to review every statute necessary to give the directors the broad scope and basis necessary to institute another round of review. And then the agency showed its hand by releasing a press release about this comment period with the title "fish removal projects". Calling Native Trout restoration projects "removals" is such a blatant attempt to tilt the public sentiment toward these projects and garner more comments in support of this ill-advised plan.</p> <p>Understand very clearly: the ongoing and increasing effects of climate change on our fisheries is going to continue to get worse. Talk to your FWP biologists; they're already seeing the tide turning, and once the FWP changes its course on preservation projects the genie will be out of the bottle. Are you all willing to risk Montana's stature as a wild trout destination, risk ruining small business owner's lives all over the state because of your shortsightedness, and give up the 5% of the state's GDP that is tied to the outdoor economy? When your grandkids come to you and ask you what you did to preserve Montana's wild trout legacy, what do you want your answer to be?</p> <p>I implore you to change course, allow these projects to move forward unimpeded, and start figuring out how to preserve this state's legacy as the best place to fish in the country.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>The Montana Fish and Wildlife commission should support native fish conservation projects that require non-native removal and should not have the authority to approve or deny fish removal projects. Experts in the field should have the authority, after full MEPA evaluation and public comment.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more</p>

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	streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.
<p>The change of direction does not appear to be in harmony with FWP vision and values. I ask you to explain your stance on the fish removal projects in the context of the following four FWP values:</p> <p>1) "Use science: We use the best biological and social science to inform and make management decisions. 2) "Provide Stewardship: we manage for healthy and abundant fish and wildlife populations, improve and protect habitat, and protect and restore cultural and historical resources." 3) "Provide leadership: We provide expertise and direction in fish, wildlife, and state parks outdoor recreation, resource management, and conservation to enhance Montana's outdoor heritage, economic future, and quality of life." 4) "All employees work as a team, value respect, and support each other; and exemplify high standards of ethics, professionalism, objectivity, accountability, and integrity.</p> <p>In the spirit of the FWP value to meet public expectations for "involvement in transparent decision-making processes" I ask you to explain your stance on the fish removal projects.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>



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<p>I am writing in support of native trout restoration projects that use removal of non-native trout as one of many tools to achieve their goals.</p> <p>As a diehard trout fisherman who has benefited greatly from the presence of rainbow and brown trout across the state, I have no illusions that they could or would be categorically eliminated - that horse left the barn long ago. But I do believe it is absolutely critical to protect native trout fisheries where we can, even when that means killing and removing non-native trout.</p> <p>Thanks for your time and efforts on behalf of the wild things in Montana!</p>	<p>Comment noted</p>
<p>Do you hate Montana? Are you in fact a real Montanan? Keep the funding up dumbass</p>	<p>Comment noted</p>
<p>Most of the fish removal projects in the mountainous portion of the state are designed to benefit native salmonid species in Montana that have been considered for listing under the Endangered Species Act. I urge you to support all these projects to prevent listings that would further complicate angling regulations. Additionally, this work is critical to maintain populations of Montana's official state fish, the blackspotted cutthroat trout (i.e., westslope and Yellowstone cutthroat), so adults and kids can continue to fish for them for generations to come.</p> <p>The projects proposed in Region 6 as well as others in Regions 1, 2, 3, and 5 seem to be designed to improve fishing for anglers and/or eliminate invasive fish illegally introduced that reduce the productivity of the water for desirable fish, or put public waters at risk to be impacted by top level predators or fish that will degrade water quality, and/or impair water quality for other uses such as livestock watering and irrigation. These projects serve the interests of Montana anglers and need to be approved to maintain diverse opportunities for recreation. I have seen the benefits of fish removal projects that reduced competition and provided excellent growth rates in planted fish in irrigation reservoirs.</p> <p>During the work session, I heard Director Worsech express concern about eliminating someone's favorite brook trout stream. A review of the projects suggests a wide distribution across the state for cutthroat trout restoration. I would encourage the Commissioners to consider a different perspective. We have many streams in Montana with brook trout present and almost all of those will remain. Reestablishing some cutthroat streams, will provide a greater diversity where in the future I can take my grandson or other kids to very catchable cutthroat waters and fish for brook trout in neighboring drainages as well. Even after approving these projects, there will be plenty of brook trout streams. If Director Worsech's staff can't direct someone to an alternative brook trout stream, I would volunteer to help them find an equivalent or better substitute stream in many portions of the state.</p> <p>I had the opportunity to listen in on the May 18 Commission Work Session and remembered that Commission Chair Robinson was concerned about livestock watering in a pond near Zortman if it were to be treated. That reminded me of a conversation I had with the managing partner of a prominent ranching family over 20 years ago that was considering a fish removal project on their main</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season.</p> <p>MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008.</p> <p>ARM 12.7.1501; 12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

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<p>ranch. He quoted an Environmental Assessment that basically showed that livestock would be unable to drink enough water to have any negative effects. I tried to find the information he quoted, but didn't find it. However, the following questions and answers from Finlayson et al. (2000) suggest any risk is extremely low.</p> <p>Q. Will wildlife that eat dead fish and drink treated water be affected?</p> <p>A. For the reasons listed above, birds and mammals that eat dead fish and drink treated water will not be affected. A bird weighing ¼ pound would have to consume 100 quarts of treated water or more than 40 pounds of fish and invertebrates within 24 hours to receive a lethal dose. This same bird would normally consume 0.2 ounces of water and 0.32 ounces of food daily; thus, a safety factor of 1,000- to 10,000-fold exists for birds and mammals. No latent or continuing toxicity is expected since under normal conditions rotenone will not persist for more than a few weeks (CDFG 1994).</p> <p>Q. Is it safe for livestock to drink from rotenone-treated waters?</p> <p>A. Rotenone was used for many years to control grubs on the backs of dairy and beef cattle. The USEPA (1981b) has stated that there is no need to restrict livestock consumption of treated waters. However, swine are more sensitive to rotenone than cattle (Thomson 1985).</p> <p>As I looked through the information provided for comment, I felt that some of these projects are relatively minor in nature with very low risk and do not rise to the level that the Commissioners should be examining each on its own merits. In order to utilize the Commissioners time efficiently and provide the FWP staff with maximum responsiveness to opportunities as they arise, I would propose that the Commission consider developing criteria to implement a programmatic approach for projects with low risk so as to not impede effective fisheries management that meet the Commissioned approved criteria. In drought years, the existing formal commission approval process may take too long once an opportunity presents itself.</p> <p>While I feel I have already provided you food for thought, I wanted to finish my comments with what I feel is one of the most important projects for you to approve, which is one in my own backyard. The North Fork Blackfoot Project had been proposed years ago by then biologist Ron Pierce out of Missoula FWP. I believe that the Carhart Institute at the University of Montana started collaborating on an Ecological Intervention Framework document regarding the project in late 2016. That's over 5 years of formal planning for the project. This project would increase naturalness in the Scapegoat Wilderness when completed by minimizing the risk of hybrids in the headwaters on downstream pure westslope cutthroat populations that are both in and outside the wilderness area. While I enjoy catching hybrids in the drainage as shown by the Parker Lake hybrid in Figure 1, I look forward to be able to catch nearly pure if not completely pure westslope in the future that are better adapted to grow in this area. I believe the plans include hiring local outfitters from the Lincoln area to help with project logistics such as transportation and providing a basecamp for workers. Funding for the project other than staff time has been secured through the Natural Resources Damage Program (\$500K) and the USFS Crown of</p>	

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<p>the Continent initiative (\$135K). After the May 18 work session, I contacted a Helena-Lewis and Clark National Forest Fisheries Biologist regarding the US Forest Service funding. I was told it will only be available until the end of 2021 and that a request to extend that funding had been denied.</p> <p>Please approve all the proposed fish removal projects, especially that proposed in the North Fork Blackfoot, and provide for the development of an efficient process that will allow Fish Wildlife and Parks' professional staff do the job that we Montana anglers deserve! Please don't allow the USFS funding to lapse after more than five years of planning!</p>	

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<p>I appreciate the opportunity to comment on Native Trout Restoration Projects and urge you to approve all the Projects currently in progress. I also appreciate your desire for transparency as well as your interest in educating yourselves about these important projects.</p> <p>These projects, spanning decades, have made significant improvements to the health of our rivers and streams, improved the health of our citizens and improved the economies of our state. As the owner of a Petroleum Marketing business for 36 years, a member and Past President of the Montana Petroleum Marketers, a Director and Past President of the George Grant Trout Unlimited, an Executive Board Member of the Big Hole Watershed Committee and as a fishing guide for 8 years I've been deeply involved in projects that have made significant improvements for the benefit of our citizens, visitors and natural resources. I applaud you for taking an interest in those projects, past, present and future. Over the years relationships have been made and trust developed between businesses, ranchers, farmers, fishermen, lawmakers and NGO's that have created economic and recreational opportunities for everyone in the state. Native and Wild Fisheries has been a driver of our economy, so I urge you approve the current projects. Going forward I hope you will be thoughtful, informed and deliberate in considering new projects to continue the good work that's been done in the past.</p> <p>All this being said, I'm deeply concerned with your decision to pause or halt the projects that are scheduled to be implemented in the near future. The news that you would consider halting or even pausing ongoing projects has disrupted contractor's work that has been planned and scheduled. These abrupt changes of direction disrupts businesses that are ready to go to work in our short construction season.</p> <p>Approve the work in progress, listen to the broad spectrum of engaged and interested folks who have been doing great work for decades and proceed with an open mind and willingness to make informed and thoughtful decisions.</p>	<p>Comment noted</p>
<p>Get the politics out of what should be guided by science (and also public opinion) and let the scientists and professional wildlife biologists do their job. Stopping this project has no realm in reality. It is purely a political gambit to overthrow the will of the people of Montana and avoid having to deal with science.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put</p>

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	<p>on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>Please consider this letter in broad support of all the fish removal projects under review. Specifically, several ongoing or proposed projects would provide both direct and indirect benefit to native species in watersheds where DNRC has substantial ownership, primarily on the Swan River State Forest (SRSF), including:</p> <ul style="list-style-type: none"> <li>• Cooney Creek</li> <li>• Red Butte Creek</li> <li>• Smith Creek</li> <li>• Swan Lake</li> </ul> <p>Montana DNRC is a cooperator and signatory to the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana (2007), is an active participant in the Swan Valley Native Fish Work Group, and developed and finalized a Habitat Conservation Plan on forested state trust lands in 2011. Implementation of the Habitat Conservation Plan is focused on maintaining and improving fisheries habitat for Bull, Westslope Cutthroat, and Columbia River Redband trout, and has been successful at providing conservation benefits to those species while maintaining an active forest management program across western Montana. As land managers DNRC is primarily focused on the habitat aspects necessary to sustain native fish populations, however, management of these species is frequently reliant on the ability to conduct targeted removals of non-native species in cooperation with MFWP to improve population status and distribution across their historic range.</p> <p>Development, evaluation, and funding of these restoration projects are typically a result of extensive planning by broad coalitions of state, federal, and non-governmental cooperators. Without these collaborative efforts, many of these projects would not be feasible for a single agency or organization to fund or implement successfully. Through these cooperators, restoration opportunities are identified and evaluated by fisheries professionals to assess the potential costs and benefits to native fish in their respective watersheds, following the guidance of regional MFWP fisheries biologists. Each of the above listed fish removal projects have complex funding packages allocated through state, federal, and non-governmental cooperators which if the timelines or objectives are delayed, risks both existing and future funding sources and opportunity. For ongoing projects, any pause in implementation may also result in substantial setbacks as removal of non-native</p>	<p>Comment noted</p>

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<p>species is a time sensitive project. Interruptions in conducting the removal may result in increased abundance of non-native species, which could increase the time and cost to already expensive, time consuming projects.</p> <p>DNRC has provided funding for and participated in fish removal projects including Lake trout suppression efforts in Swan Lake. Illegal introduction of Lake trout into Swan Lake has had a significant adverse impact on the Bull trout population in the Swan River watershed, with populations decreasing substantially following Lake trout establishment. Bull trout designated critical habitat is present in approximately 20 miles of stream on the SRSF, which annually supports over 40 percent of the Bull trout spawning in the watershed. Continued declines in the abundance of Bull trout are likely to occur in the absence of active suppression as a result of the increasing Lake trout population in Swan Lake, highlighting the importance of the proposed project.</p>	
<p>The Bureau of Land Management, Dillon Field Office, would like to offer its support of the proposed westslope cutthroat trout Restoration Projects in South West Montana. The Bureau of Land Management is committed to the restoration of native species such as westslope cutthroat trout and is prepared to assist Montana Fish, Wildlife and Parks in these project as needed. Due to the limited distribution of this native trout in South West Montana, projects such as this are essential to the long-term persistence of the species. Over the last 20 years the Dillon Field Office has been working to preserve westslope cutthroat trout populations and habitat within South West Montana through changes in land management as well as active participation in cooperative westslope cutthroat trout restoration projects. The proposed and ongoing restoration efforts taking place with BLM ownership such as Cottonwood Creek and French Creek as well as projects such as Selway Creek with no BLM ownership are consistent with the long-term fishery management</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>goals of the Bureau of Land Management and the Dillon Field Office and we pledge our support to achieving the goals of the projects.</p>	
<p>Fish removal projects are typically designed to address one of two problems. In some cases, undesirable fish species, usually established through illegal fish plants or bait bucket transfers, are overwhelming the existing sport fishery. This leads to reduced survival and growth of the sport fishes and loss of fishing opportunity. The best option is to eliminate the fishery and re-establish desired species.</p> <p>Native fish have declined in range and abundance due to some combination of habitat loss, overfishing and competition and/or hybridization with non-native fish. It is necessary to remove the source of non-native fish and establish protected populations of native fish in former indigenous habitat. This protects Montana's natural heritage, keeps species from being listed under ESA and provides sport fishing in many cases.</p> <p>These projects below are typical of fish removal projects, most required years of surveys and analysis and went through public review before approval. Many projects show multiple partnerships and utilize fish removal above barriers to ensure successful establishment of westslope or Yellowstone cutthroat trout. The new native fish will provide as good or better fishing than the pre-existing populations of non-native fish. Expanding the range and abundance of native fish helps ensure they will not be listed as threatened or endangered and placed under federal management. Native fish are part of Montana's natural heritage. Fish removal funding is limited and only the best projects, those with the highest probability of success and those expanding the range of native fish the most, are selected for final approval. FWP has some of the foremost fish biologists in the nation working on fish removal projects and all projects undergo review by a statewide committee.</p> <ul style="list-style-type: none"> <li>• Flathead River Tributaries (7) – the Flathead River has one of the largest and purest interconnected westslope cutthroat populations in Montana. Westslope cutthroat have been reduced to less than 10% of their historic range statewide. Rainbow trout were introduced more than 70 years ago before native fish management was a priority but rainbow and cutthroat spawning was separated by timing and distribution. Climate change has allowed rainbows to move further up the drainage and decreased the separation of spawning, resulting in</li> </ul>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>increased introgression of cutthroat. If westslope cutthroat purity slips below 90% the Flathead will no longer be considered a westslope cutthroat population and that would mean the loss of about half the interconnected populations in Montana. Rainbows spawn in selected tributaries, the fish are trapped entering the streams before spawning and transported to a local family fishing pond. Fishing opportunity and cutthroat genetic integrity are preserved.</p> <ul style="list-style-type: none"> <li>• Cooney Creek – most of the Swan Drainage has rainbow x cutthroat hybrids. Cooney Creek is one of the few remaining pure cutthroat populations. Most of the stream is remote, some is on private property so there is little fishing pressure. Mechanical removal of brook and rainbow trout improves the long term security of the population.</li> <li>• Red Butte Creek – US Forest Service is taking the lead in this brook trout removal project in the Swan. Captured brook trout are moved downstream, the USFS is in an EA process to complete a barrier to improve project success.</li> <li>• Smith Creek – US Forest Service is taking the lead in this brook trout removal project to reduce competition with native westslope cutthroat. Pure cutthroat populations are limited in the Swan drainage.</li> <li>• Swan Lake – originally one of the bull trout strongholds in northwest Montana. Illegally introduced lake trout are threatening bull trout abundance and have greatly reduced kokanee abundance. Swan Lake has been the focus of more than 10 years of graduate studies and interagency lake trout removal strategies. Agencies are currently reviewing data to determine the best route forward with US Fish and Wildlife Service taking the lead.</li> <li>• Martin Creek – there have been a number of cutthroat restoration projects in the Stillwater drainage including Martin Lakes. This joint project with USFS will replace a hybridized population with pure cutthroat. One year of treatment already completed.</li> <li>• North Fork Blackfoot – this exciting project proposes to remove rainbow/cutthroat hybrids from above barriers and replace with pure westslope cutthroat. This project would establish pure native populations in more than 40 miles of interconnected stream and several lakes which makes it a very high priority for implementation. This project has undergone lengthy analysis and public comment. The project has a high potential for success and is appropriate management for the Scapegoat Wilderness Area.</li> <li>• Koi Pond, Bitterroot Valley – Koi are basically a variety of carp and if released into the wild can grow quite large and become a nuisance. Koi ponds are only permitted in certain areas, this pond is not permitted and could be flooded by the Bitterroot River.</li> <li>• Andrus Creek – this tributary in the upper Big Hole has been invaded by rainbow and brook trout. This multi-agency project will build a barrier and replace hybridized fish with pure westslope cutthroat to expand occupied native range.</li> <li>• Unnamed Pond, Bridgers – unauthorized fish plants into private ponds are a major vector in illegal fish introductions that in turn become a source for further illegal introductions. This project would remove illegal walleye and perch.</li> <li>• Buffalo Creek – Buffalo Creek flows out of the Absorakee-Beartooth</li> </ul>	



Supporting Comment	FWP Response to Comments
<p>Wilderness into Slough Creek and the Lamar River in Yellowstone National Park. An historic rainbow plant into Hidden Lake in 1935 became a source for rainbow trout hybridization. Fish removal along with natural and constructed barriers will ensure success with re-established pure Yellowstone cutthroat. This a multi-agency project and one of the highest priorities for Yellowstone National Park in Yellowstone cutthroat conservation. The project is consistent with wilderness principles. Buffalo Creek was historically fishless but Yellowstone cutthroat will be allowed to remain as a conservation population. Yellowstone cutthroat have been reduced to 33% of historic range in Montana.</p> <ul style="list-style-type: none"> <li>• Arapooish Pond – a popular fishing pond, sport fishing has been diminished by overabundant suckers and minnows. Removal will enhance bass growth and survival and sport fishing.</li> <li>• Unnamed Pond, Zortman – goldfish are a relative of the carp family and can grow to nuisance size and numbers in some places. Koi and goldfish are allowed in permitted ponds where they aren't a threat to adjacent waters. Illegal goldfish are often moved to adjacent waters when they become a nuisance or as winter approaches. This pond should be cleaned out and restocked with more appropriate fish species.</li> </ul> <p>All of the above listed projects are consistent with management of native fish and management of illegally introduced fish. All of these projects have undergone extensive analysis and public involvement, represent interagency cooperation in many cases and present a high potential for success. Success will enhance the abundance and distribution of native westslope and Yellowstone cutthroat, retaining management of the Montana State Fish with Montana Fish, Wildlife and Parks. The majority of the projects will also improve sport fishing opportunities. I encourage the FW Commission to approve these projects.</p>	

Supporting Comment	FWP Response to Comments
<p>Montana has a reputation for wild and native fish that other states could only hope to have. A big reason for this well deserved reputation is the departments historical willingness to make tough decisions that involve removal of invasive non-native species in certain waters. Often the non natives not only out compete native populations for scarce food and habitat resources but are piscivorous or otherwise harmful to the native population. I applaud and support the departments past efforts to remove these non natives where appropriate to support the native populations. I hope this current hold and review process does not unnecessarily delay these important and previously vetted and approved projects.</p> <p>The first thing that stood out to me is the sheer number of partners the department is cooperating and coordinating with on these projects. Of the 22 projects listed, it appears that only 4 do not have a partnership arrangement of some type. And the list of partners is amazingly diverse. These partners include private entities (landowners, outfitters, Northwestern Energy Corp, Turner Enterprises), various FWP programs (State Wildlife Grants, Future Fisheries Improvement Program grants), other State of Montana departments and boards (Montana Department of Transportation, Montana Natural Resource Damage Program), not for profit organizations (Trout Unlimited, Western Native Trout Initiative, One Fly Partnership, Arctic Grayling Recovery Program, Montana Trout Foundation, Trout and Salmon Foundation) and several federal agencies and programs (US Forest Service, Bonneville Power Administration, National Park Service, Bureau of Land Management, National Wildlife Federation, US Fish and Wildlife Service). I am truly impressed at the breadth and diversity of the partners FWP fisheries staff has utilized in their efforts to maintain and support our critical native fish and fisheries. I can only imagine the extraordinary amount of coordination of resources, manpower, funding and mutual trust among such a diverse group of partners behind the conception, design and execution of these projects. I have to believe that the projects with partnership arrangements went through many levels of review within all of the entities involved before receiving their collective approval. I sincerely hope the delay of some of these projects does not impact the departments credibility and ongoing ability to work with these or potential future partners.</p> <p>The other thing I noticed in the list of affected projects was how long some of them have been going on and I question why they were halted for a review at this time. As a resident of Kalispell, I am very familiar with the Region 1 project concerning removal of non-native rainbow trout for Westslope Cutthroat trout recovery that has been ongoing since 2014. I very much support this project. I see some of projects listed have Environmental Assessments dating back as far as 2012. Several projects note that work has begun in previous years. I support good governance and certainly appreciate ongoing questioning and re-examination of previous decisions, however; I question why the sudden decision was made to hold up the ongoing projects that have established partners, funding and previously scheduled field work. These efforts represent commitments made in good faith by the department and its partners. It is not</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

<b>Supporting Comment</b>	<b>FWP Response to Comments</b>
<p>the Montana way to suddenly stop something involving partners without advance notification that you are even considering a halt for a review even if for a short time.</p> <p>In conclusion, I urge you to complete this review as soon as possible, lift the hold and get these projects back on track. I hope the halt has not caused too much damage to our native fish and fisheries.</p>	

Supporting Comment	FWP Response to Comments
<p>Regarding your request for comments on the MFWP Commission decision on 22 "Fish Removal Projects," the Magic City Fly Fishers encourage the commission to APPROVE all of the listed projects.</p> <p>Magic City Fly Fishers represents approximately 200 members of Trout Unlimited and an additional 250 Billings area fly fishing enthusiasts. Magic City Fly Fishers has volunteered and financially supported fish removal projects in the past including the use of piscicide and found them to result in much higher quality fishing opportunities for both adults and young people. In addition, we are aware of many fly fishing enthusiasts from all over the United States who travel to Montana just to partake in the high-quality, wild-trout fishing opportunities available in Montana.</p> <p>It is our belief that without these projects, the long-term quality of this popular local sport, as well as attractiveness to out-of-state visitors, will be significantly diminished.</p> <p>Thank you for your hard work in supporting high-quality fishing recreational opportunities in Montana.</p>	<p>Comment noted</p>
<p>Regarding your request for comments on approving the 22 "Proposed Fish Removal Projects 2021" I encourage the commission to APPROVE all of the listed projects.</p> <p>A great deal of thought, research, and work (and taxpayer dollars) has gone into each of the projects. Although varying, all of the projects yield a very positive ROI on the state's investment.</p> <p>Once completed, these projects add to the high-quality fisheries in Montana, one of the reasons many people visit Montana and spend their traveler dollars as well as those of us who have grown up in Montana and want to live here.</p>	<p>Comment noted</p>
<p>I am a strong proponent of native fish restoration actions. As a PhD student focusing on fisheries conservation and management with a dual degree in ecology, evolution, and behavior, I am part of an effort to aid in the reintroduction of Arctic grayling to the state of Michigan. However, our state does not have plans to remove non-native species in order to restore this once plentiful native fish, making a full restoration difficult.</p> <p>The efforts that Montana FWP is taking shows the pride and valuation of native fishes that are in need of such protective actions. Throughout the US, native fish populations are in peril and face the constant threat of extirpation or extinction without conservation actions. Yes, I support non-native fish removal actions! Thank you, Montana, for setting a great example of native fish conservation.</p>	<p>Comment noted</p>
<p>As a concerned angler, I FULLY SUPPORT the Fish Removal Project to restore Native Fish. It has become very clear from sound scientific research, that non-natives decimate populations of Native Trout and replace them.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I am writing on behalf of all Rowe Excavation, Inc., and fellow Montanans, and to show our support of the Fish &amp; Game Commission and the funding from the FWP helps goes towards to greatly enhance our rivers, streams, and fisheries. The grants and funding are important for not only the ecological impact that they play, but also for the economic impacts they play in the communities like ours and other communities of Montana. Rowe Excavation, Inc. resides in Beaverhead County, and we have many years of working closely with different federal, state, and local government agencies. Our projects take us over all parts of Montana and other States as well, and we have seen what positive changes can be achieved by these projects including helping restore native fish in our County and others. Your continued funding and support can help support projects such as these examples attached. We look forward to many more years of working closely with FWP and continue support of the Fish &amp; Game Commission.</p>	<p>Comment noted</p>
<p>Please keep working to make our Montana native fish the ones who are winning. Please keep funding the research and work. Please introduce minimum stream flow legislation so that all our fish and rivers don't die.</p>	<p>Comment noted</p>
<p>As a river front landowner, avid fisherman, and conservationist, I am adamantly opposed to any halt of ongoing projects throughout the state that seek to restore native fish and suppress nonnatives. These projects have been fully vetted, studied, often fully funded, and are good, science-based projects that are extremely important to the state and its residents.. There is no valid reason for halting them, particularly ones that are currently being carried on right in the middle of spawning season and migration season for the cutthroat, such as the study in the North and Middle Forks of the Flathead!!</p> <p>These projects should not now need Commission approval. Restart the projects immediately for ongoing projects, and if Commission approval is needed, take it up for any future aspects and/or projects.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>I'm reaching out to urge you to please approve all of the proposed native fish restoration projects on your list. Projects like these already go through a public comment process through NEPA/MEPA and are meticulously thought through and planned. Stopping any one of these projects would be an incredible waste of tax payer money given the amount of resources already dedicated to them.</p> <p>Moreover, Montana is known throughout the west for our incredible success restoring and conserving native fish. This legacy is the result of our hardworking and dedicated fisheries biologists. Please don't make their jobs more difficult than necessary. And please continue to support native fish restoration in our state.</p>	<p>Comment noted</p>
<p>I am emailing you in support of projects that restore our native fisheries. Some of the rivers of Montana are so inundated with introduced species that the entire ecosystem has been disrupted due to the predation that occurs. Small wildlife can't fight against northern pike and large mount bass. Introduced trout eat out native small animals as well. Please work to restore our rivers for the benefit of the small animals out there that often get overlooked.</p>	<p>Comment noted</p>
<p>We are writing to voice our support for all of the proposed projects that support the future success of our native cold-water fisheries.</p> <p>Montana is well known for the abundance of our wild and native trout. But as the temperature of Montana's rivers, streams and tributary waters continues to rise, the long-term success is diminishing for fish like our Bull, Westslope and Yellowstone Cutthroat trout. The success of these fish not only depend on cold and clean water, but keeping their aquatic counterpart numbers in check. All of the projects slated to go back through FWP's commission approval process have already been through Environmental Assessment which we believe is reason to grant approval yet again.</p> <p>In our opinion, this is no time to put these projects on hold opposed to finding ways to cultivate success in our waterways.</p> <p>Our fisheries simply set us apart from most other states' fisheries. An estimated revenue from fishing in Montana is \$907 million dollars a year. It's apparent that people travel near and far to fish our fabled trout. Our hope is they will always be a priority to protect.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>Thank you for taking the time to read my email regarding my support for the ongoing efforts of FWP to restore native species of fish and to remove hybrid and non-native fish species from Montana waters. The temporary setback of fishing opportunities lost by these removal projects will be offset by the gains made in restoring healthy, natural, and native fish in our fisheries in the future.</p> <p>I am an avid angler and I consider places like the Southfork Flathead River to be a national treasure as a native cutthroat trout fishery. I believe we owe it to our future generations to leave intact, as much as possible, our native Montana fish populations in as many bodies of water as possible.</p> <p>I also feel that spending money in an effort to prevent AIS from making their way into our state is of the utmost importance.</p>	<p>Comment noted</p>
<p>Please move forward with conservation efforts to rebuild populations of native species that will be robust and are part of preserving MT's natural heritage This will require the removal of non-native species in most cases and I think the angling public is supportive</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I am writing today as a public citizen, concerned angler, and committed advocate of Montana's world class fish and wildlife resources. Throughout my life I have had the opportunity to fish and explore some of the world's best wild and native trout streams here in Montana, and I cannot think of a place I would rather call my home waters. Of course, these renowned resources did not happen by accident; they are the product of many dedicated professionals and biologists at Montana Fish, Wildlife, and Parks (FWP) that not only pioneered wild and native fish management as we know it, they fought to defend it for decades. Personally, I was lucky enough to grow up outside of the Northeastern entrance of Yellowstone National Park, which is home to incredible wild and native fish resources. Through my childhood and into professionally guiding fly fisherman throughout the Greater Yellowstone Ecosystem, I not only got to experience the rewards of catching wild and native fish myself, but I also got to share that experience with people from all over the world. On a number of occasions, I was able to share the incredible restoration story of Soda Butte Creek, for example, with those anglers. What was once a polluted stream full of small non-native invasive species has turned into a world class native cutthroat fishery thanks to the work of many private, state, and federal partners, including FWP. I hope that future generations can witness such remarkable transformations and angling opportunities all across our state. That personal background is what gave me great pause when I learned about the recent decision by the staff leadership at FWP to transform the way in which the agency approaches their wild and native fish restoration program, and perhaps the management of those species in general. The decision to send an entire season of wild and native fish restoration projects back to the public comment period appears unnecessary and adds additional bureaucratic red tape to a process that has worked well for decades. As you are aware, these projects have been thoroughly vetted through rigorous scientific analysis as well as robust public participation</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>



Supporting Comment	FWP Response to Comments
<p>processes afforded under Title 75, Chapter 2 of MCA. However, since the decision has been made to send these worthy projects back out for public comment, I wish to express my strong desire that the Commission swiftly approve all of the proposed projects now being considered at their June 24th meeting. While I could go through the merits of each of these projects individually, let me sum it up for the purposes of brevity – all of these are quality projects that cannot sustain further delay.</p> <p>Lastly, I would point out that much of the story about how we got to this point of needing to submit additional comments happened well outside of the sunlight of the public. It is still unclear to me and many of my fellow anglers as to how, when, where, and why the decision was made to require yet another round of public comments on these important restoration projects. I firmly believe that the business of the public is best done in transparent collaboration with all stakeholders and well within the light of eye of the public. While I understand we are where we are at this point, I believe that the precedent that this decision makes is not only in violation of Article II, Sections 8 &amp; 9 of the Montana Constitution, but it is also bad practice for a public agency and Administration that espouses to seek transparency and reduction of “red tape” and bureaucracy.</p>	

Supporting Comment	FWP Response to Comments
<p>We write today to urge approval of the 22 proposed fish restoration projects that are currently being considered by the Fish and Wildlife Commission. Native trout such as our state fish, the cutthroat, are important to both resident and non-resident anglers as well as guides and outfitters who rely on healthy fisheries for their businesses. Montana Department of Fish, Wildlife and Parks (MTFWP) has long prioritized the conservation of native fish species, and this strategy has resulted in long-term benefits and increased angling opportunities throughout Western Montana. Putting these important fish restoration projects on hold while citing vague interpretations of the law is a dangerous precedent and puts at stake years of collaboration between MTFWP staff, conservation organizations, and landowners. The Department, with its fisheries biologists and managers, has always been able to approve these projects in a timely manner, and each project is still subject to environmental review and public input. In contrast, MTFWP's recent decision to hold up these projects was done without public input from anglers, outfitters, guides, and organizations that have an interest in the future of cold-water fisheries in Montana. Native fish restoration projects that include the removal of non-native species often result in healthier, more well-adapted fisheries that increase angling opportunity. Given that some of the projects involve the removal of unlawfully introduced non-native species that are a direct threat to highly-valued fisheries, the decision to delay these projects and make them subject to Commission approval is baffling. We urge approval of all 22 projects during the next Fish and Wildlife Commission meeting. HHA looks forward to working with MTFWP to ensure that our native and wild trout populations—which bring hundreds of millions of dollars to Montana each year—remain protected for future generations to enjoy. This includes the continued restoration of native trout species.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>Please support Native fish recovery efforts in Montana. There are many reasons to focus on reviving native fish in our watersheds. As an avid resident angler of the state, I ask you to support these reintroduction efforts.</p> <p>Native fish deserve their place in our Montana streams. When people come to fish the state, it should be the fish that evolution and natural selection created. These keystone species are what make our part of the world unique, just as nature intended.</p>	<p>Comment noted</p>
<p>Our Region and MTFWP have long enjoyed a productive and collaborative relationship on the co-management of aquatic species and the habitats on which they rely. These projects include both native and desired non-native recreational fisheries that are both important to the State and the Forest Service. Of the 22 fish projects that were discussed at the Commission’s May 18 work session, eleven of those projects are jointly developed, partially funded, and mutually implemented with the Forest Service. We appreciate this robust partnership that contributes to all lands and species conservation outcomes. In some cases, these collaborative efforts provide the partnership and management mechanisms that can be reviewed by the US Fish and Wildlife Service as they review Endangered Species Act listing petitions, as has been the case for species such as westslope cutthroat trout, Yellowstone cutthroat trout and Arctic grayling. These species use and occupy ranges of habitats from large rivers and private lands up to the mid and headwaters, often managed by the US Forest Service, therefore requiring a shared approach to stewardship. Our interest in the conservation and management projects are driven by two primary factors. First is the cooperative aquatic stewardship with Montana Fish Wildlife and Parks, as well as a myriad of other partners. This desire is codified, for example, in the 2007 Memorandum Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana; an MOU with over 20 signatories spanning industry, state and federal resource management entities, tribes, and conservation groups. Second is law, policy and rule that govern our actions related to species conservation and sportfishing with a multiple use framework. These directions are usually codified in forest plans. The same forest plans that guide vegetation and fuels management across the state on Forest ownerships. All of the aquatic projects that the Northern Region and individual National Forests (Flathead, Lolo, Helena Lewis and Clark, Beaverhead-Deerlodge, and the Custer-Gallatin) are involved in and which are being considered by the Commission in your upcoming June 2021 meeting are projects that will contribute to the objectives mentioned above. Additionally, these projects will contribute to conservation of native and wild fishes of Montana, creating increased and improved recreation experiences in many cases (usually via a better fit between fish species and their habitat), and helping maintain resources vital to the State’s and the Forest Service’s stewardship of the iconic landscapes that are the envy of many other western neighbors. Our desire is to continue to productively engage and be a valued partner and contributor to aquatic stewardship across the State of Montana,</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>with these respective fisheries removal and management projects being a key factor in our collective success</p>	
<p>Please allow the proposed native fish restoration projects to proceed. They have been thoroughly vetted and are an enormous benefit to our local river ecosystems. The large majority of our waterways have been heavily impacted by invasive species and human intervention, trying to preserve/restore some of the best trout habitat for native species is of critical importance. Protecting our native trout also lends itself to healthy competition and survival thus better preparing our rivers and creeks against diseases that could decimate our trout populations. I applaud FWP for their efforts to date and hope that they continue to do this important work to better prepare our rivers for an uncertain and changing future.</p>	<p>Comment noted</p>
<p>As an advocate for the Clark Fork Basin and our native fisheries, the CFC supports the agency's proposed removal actions within the Clark Fork watershed, i.e. Region 2.</p> <p>As a general rule, the CFC supports restoration projects in our watershed that promote connectivity, restore habitat, boost flows and support/restore native fish species, particularly on key tributaries within the Clark Fork basin. In recent years, the CFC has invested hundreds of thousands of dollars in projects that improve fish passage, eliminate entrainment, and restore stream and floodplain habitat on numerous tributaries in our watershed. CFC's projects have brought tremendous successes for struggling native fish populations. These projects – like FWP's projects – have also brought economic investment into local economies in our watershed, with much of that investment going to engineers and contractors in places like Powell and Ravalli counties. Many of the most iconic fisheries in the Clark Fork watershed (such as the Bitterroot, the Blackfoot and Rock Creek) are huge economic drivers because of their native fish populations.</p> <p>In particular, the CFC would like to note its support for FWP's North Fork Blackfoot westlope cutthroat restoration project. As noted in the agency's EA, this project will establish a secure conservation population of westslope cutthroat trout in the North Fork Blackfoot River while simultaneously eliminating a source of nonnative genes that threaten native westslope cutthroat trout in the North Fork Blackfoot River watershed downstream of the barrier falls. The proposed action would provide a clear, ecological benefit at a very low cost to FWP, who need only contribute staff time. This project has been fully vetted by the agency and the public has had its chance to weigh in. We recognize that Director Worsech has already approved this project; nonetheless, it deserves the support of the full Commission.</p> <p>In short, FWP's native fish restoration projects properly recognize that Montana is never going to protect our native fish populations without some targeted efforts to control competing non-native fish. With growing threats from things like climate change, the efforts to protect native fish are more important than ever.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>For decades Montana Fish, Wildlife, and Parks has managed one of the world's preeminent fisheries. MT fisheries biologists have long been at the forefront of establishing and maintaining the best wild trout stream fishing in the nation, a resource which brings tremendous numbers of people from across the nation and from many foreign countries The fisheries of Montana rival the very best in the world.</p> <p>The projects currently being reviewed have been well vetted by scientific and management professionals. Most of them have gone through extensive review pursuant to the Montana Environmental Policy Act. Restoration of native fish species, using all the sound management and research tools in the toolbox, has been going on for years to the betterment of Montana's fisheries and undoubtedly its reputation as a destination for visiting and resident anglers. That translates to major economic benefits for Montana's businesses and citizens.</p> <p>The projects under consideration this year and all future such projects should be approved pursuant to the existing process and not clog up the deliberations of the Fish and Wildlife Commission. FWP's actions create a problem where none exists and a new process where none is needed.</p>	<p>Comment noted</p>
<p>I have seen some of the past Montana FWP efforts of native trout restoration projects and the results are impressive. Ruby Creek in the Madison Valley comes to mind, where there was already a natural barrier in place and the nonnative fish had to be removed above the barrier. This creek now supports a fine native population of westslope cutties.</p> <p>I am fully in favor of continuing restoration projects such as those proposed for this year that return the natives to their original habitats.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>While I write these comments based on my 17 years of experience as a Montana attorney representing agriculture, industry, in-stream flow interests, and natural resource users in the areas of water rights and environmental and natural resource litigation and governmental affairs, the following comments are not provided on behalf of any client. They are my own opinions and should not be attributed to any client I have represented or presently represent.</p> <p>I fully concur with the concerns a number of my fellow Montanans have expressed about the lack of transparency in the agency's actions that led us to the present point. I further wholeheartedly agree with the legal analysis offered by Commissioner Byorth at the recent Commission work session. Although Commissioner Byorth and I have been on opposite sides of litigation in the past, he is absolutely correct in his assessment that the agency's statutory interpretation that further public comment and Commission approval is required before the 2021 field season work can take place is, at best, tortured and, at worst, fabricated for the purposes of delay and denial. Finally, I share in the puzzlement over FWP promulgating more and unnecessary bureaucratic delay while the Gianforte administration is purportedly so committed to "red tape reduction" as to issue its first executive order establishing a commission to eliminate unnecessary bureaucratic processes.</p> <p>I write to express my particular concern that the delay and perhaps full disapproval of wild and native fish restoration projects will negatively impact the agricultural interests I am so proud to represent. The rural Montana landscape is dotted with examples of wild and native fish restoration projects that are the result of successful collaborations between landowners and habitat restoration interests. And why would landowners be willing to so collaborate? Because successful restoration can be the difference between being able to continue to irrigate in a way that protects fish populations and facilitates crop cultivation or having irrigation fully shut down because of adverse impacts on endangered species or species of concern. Wild and native fish restoration projects such as those slated for the 2021 field season mean that both Montana agriculture and Montana fish can flourish, and that's something we should all support.</p> <p>I respectfully ask that the Commission approve the 2021 field season restoration projects with all due haste. Our farmers and our fish deserve no less.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>I am writing to express my concern over the proposed changes to the approval process for non-native fish removal projects in Montana. As a fisheries and environmental policy specialist, I am familiar with the science behind removing non-native fish species and the project evaluation processes currently in place in our state. I have the utmost confidence in our state fisheries biologists and regional fish and wildlife managers. As scientists, they have the ability to assess sites for fish removal, evaluate possible impacts to the fish populations, and select sites where native fish are likely to flourish in the absence of non-native competitors and where those non-natives are unlikely to become re-established.</p> <p>I understand the importance of fish and fishing to Montana's economy, and I do not believe that these extremely targeted projects have the ability to compromise our non-native game fish populations. The majority of rivers in our</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined</p>

Supporting Comment	FWP Response to Comments
<p>state are currently dominated by non-native game fish including rainbow and brown trout. Removing this tool (fish removals using rotenone and/or mechanical means) from the fisheries management tool box will not result in stronger non-native trout populations, but it will threaten some of the remaining genetically robust native trout populations.</p> <p>However, my greatest concern is that this proposal would take the decision process out of the control of the people with the knowledge, experience, and training in fisheries management. The native fish that our biologists are trying to support with these projects are part of Montana's legacy. They are part of the historic landscape here, and in the absence of well-informed and planned management, are not likely to persist at levels that can support recreational angling pressure.</p> <p>The projects that are now on hold and many that would not go forward without Commission approval under this new provision have been reviewed under Montana law, including our Montana Environmental Policy Act (MEPA), and are the result of many years of interagency and collaborative planning, often including planning with local landowners. Some projects are in process and interrupting these projects may negate any gains for native fish and require that the projects start over or be abandoned, a huge waste of taxpayer dollars and agency effort.</p> <p>None of these projects was set up on a whim, and public comment is often used to adjust the projects to address public concerns. It is counter to the MEPA and stream-related permitting processes Montana requires to place the decision authority for these projects in such a limited set of hands. MEPA and other resource management laws, including federal laws like the National Environmental Policy Act (NEPA) rely on the use of "best available science" to support better decision making related to Montana's public resources such as our fisheries. Our fisheries managers develop projects based on years of study and adaptive management using the best available science. I believe they should always be involved in the decision making related to our precious fisheries resources.</p> <p>Please reject this new provision. Respect our fisheries managers as the qualified scientists that they are and allow their projects to proceed. Keep the science in our fisheries management.</p>	<p>approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>I am writing in support of the proposed fish removal projects to restore native trout and grayling... Thanks to our abundant rivers, native and wild trout populations Montana is synonymous with trout fishing like Colorado is to skiing.. Trout fishing has become a multi million dollar industry. People come from far and wide to trout fish . It is on many angler’s bucket list to fly fish Montana at least once in their lives... The money spent by residents and non-residents filters through many sectors of our economy. Montana’s native trout unfortunately inhabit only a small percentage of the waters they once roamed. There is great value in catching a wild native fish in its traditional habitat and its becoming more rare. Montana’s native species and ecosystems are under assault from illegally introduced invasive species as is the case in many parts of the US. If you move forward to stop these restoration projects , it will only encourage bucket biologists to plant non-native fish in our waters.. Why does a walleye club have so much influence over Montana FWP . Your job is to protect our valuable natural resources not destroy them</p>	<p>Comment noted</p>
<p>I’ve lived in Montana for all 28 years of my life, and have a deep appreciation for healthy rivers with abundant opportunities for recreation, learning, and even inspiration. They truly are one of the many highlights of our beautiful state. At a glance, the fish removal projects appear to hurt our rivers by depleting fish populations, and lowering the recreational value of Montana’s waterways. However, I have some insight into this controversy that many do not. I grew up in a household of wildlife biologists, who have both an appreciation for the activities healthy rivers can facilitate, and a respect for ecosystems that have been teeming with life for many years before Montana was even a state. These ecosystems are at risk of becoming something very contrary to what Montana is and has always been: a place where native species flourish in crystal clear, cool water, and are part of an incredibly productive and fascinating environment. With non-native fish taking advantage of their resilience to warmer, dirtier conditions, they threaten to replace native species like our state fish, the Westslope Cutthroat trout. While these non-native fish certainly have recreational value to humans, they are not always conducive to a healthy overall ecosystem. Native species are an important part of this health, and taking action to preserve them in various rivers and streams across Montana feels like a high priority to me. Killing off invasive species such as Brook trout sounds harsh, and I certainly don’t see this method of removal as an ideal situation, but I do think the importance of preserving fish like the Cutthroat outweighs this. I support these removal projects in spite of some of the controversy that accompanies them, because I believe that long term ecosystem health that prioritizes native species will not only lead to better quality rivers, but an enhanced recreational experience for all of us lucky enough to live here and enjoy it.</p>	<p>Comment noted</p>



Supporting Comment	FWP Response to Comments
<p>I'm writing in support of the non-native fish removal projects under consideration, particularly those that are already underway and/or well along in various stages of diligence &amp; approval (EAs completed, comment/permitting completed, previously approved).</p> <p>In particular, it is critical that projects that are already underway (having already gone through approval processes) be continued, as they have already been thoroughly vetted (including public support), with a great deal of planning and/or resources already expended. Further, their effectiveness in removing non-native species to conserve and/or restore native fish populations can be disrupted or reversed if not completed on the current timeline (or they would become more expensive to complete, wasting already vetted public resources). Those projects include ones like Red Butte Creek &amp; Cooney Creek, North Fork Blackfoot, Martin Creek, and Andrus Creek, among others.</p> <p>Ultimately, these projects aim to restore Montana's native fish species, for which we are famous worldwide. In addition to being part of our way of life, these species are part of what makes Montana such a sought-after destination.</p> <p>Please approve the non-native fish removal projects.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>Just want to add my voice as a 40-year-plus fisherman in Montana that you must continue recovery efforts. We've already had a fish kill on the Madison, and lots of testimony that the brown trout fishery on the Big Hole and other rivers is in deep trouble. Are you going to pretend everything is fine? Your job is to protect fisheries, to tell it like it is. As soon as you "adjust" your message to please your overlords, politicians, you've lost your integrity. Don't cut back funding for recovery of native trout. We need you to advocate for the fisheries and not equivocate for the politicians (who are ignorant of science, ignorant of aquatic biology, and ignorant apparently of the meaning of a good day on our rivers).</p>	<p>Comment noted</p>
<p>I am writing to ask that at the June 24th meeting, the Commission approve all of the proposed projects. The old adage, "if it's not broken, don't fix it," seems to apply to the redundancy that has taken over a process that was previously working and serving both the Montana public and our treasured water resources in a transparent fashion. I don't understand why projects that have already been vetted by scientists are now undergoing an additional level of assessment, by individuals with less scientific expertise. This feels like my MT tax dollar being wasted, and I fear that the wild and native trout that make Montana such a special place will suffer, if these projects are further delayed.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as</p>

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	<p>planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>We are very concerned and, frankly, dismayed that you would make approval of these fish removal and restoration projects an issue for the Fish and Wildlife Commission.</p> <p>For decades Montana Fish, Wildlife, and Parks has managed one of the world’s preeminent fisheries. MT fisheries biologists have long been at the forefront of establishing and maintaining the best wild trout stream fishing in the nation, a resource which brings tremendous numbers of people from across the nation and from many foreign countries The fisheries of Montana rival the very best in the world.</p> <p>For decades Montana Fish, Wildlife, and Parks has managed one of the world’s preeminent fisheries. MT fisheries biologists have long been at the forefront of establishing and maintaining the best wild trout stream fishing in the nation, a resource which brings tremendous numbers of people from across the nation and from many foreign countries The fisheries of Montana rival the very best in the world.</p> <p>The projects currently being reviewed have been well vetted by scientific and management professionals. Most of them have gone through extensive review pursuant to the Montana Environmental Policy Act. Restoration of native fish species, using all the sound management and research tools in the toolbox, has been going on for years to the betterment of Montana’s fisheries and undoubtedly its reputation as a destination for visiting and resident anglers. That translates to major economic benefits for Montana’s businesses and citizens.</p> <p>You have expressed a commitment to getting all the current projects passed by the Commission as quickly as possible. While that is desirable, it completely misses the point of our concerns. The projects under consideration this year</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>and all future such projects should be approved pursuant to the existing process, by resource professionals, and not made to clog up the deliberations of the Fish and Wildlife Commission, a politically appointed entity. FWP's actions create a problem where none exists and a new process where none is needed.</p>	
<p>For decades Montana Fish, Wildlife, and Parks has managed one of the world's preeminent fisheries. MT fisheries biologists have long been at the forefront of establishing and maintaining the best wild trout stream fishing in the nation, a resource which brings tremendous numbers of people from across the nation and from many foreign countries. The fisheries of Montana rival the very best in the world.</p> <p>The projects currently being reviewed have been well vetted by scientific and management professionals. Most of them have gone through extensive review pursuant to the Montana Environmental Policy Act. Restoration of native fish species, using all the sound management and research tools in the toolbox, has been going on for years to the betterment of Montana's fisheries and undoubtedly its reputation as a destination for visiting and resident anglers. That translates to major economic benefits for Montana's businesses and citizens.</p> <p>The projects under consideration this year and all future such projects should be approved pursuant to the existing process and not clog up the deliberations of</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put</p>

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<p>the Fish and Wildlife Commission. FWP's actions create a problem where none exists and a new process where none is needed.</p>	<p>on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>On behalf of the Invasive Species Action Network, I would like to formally submit that our organization in general is in support of FWP fish removal projects to protect native fisheries and their habitats. Invasive species cause serious impacts to our native fisheries and other native aquatic species, as well as creating dramatic economic impacts. The historic process to develop, approve and implement fish removal projects is rigorous and inclusive to public comment. Many of the current projects pending approval will provide much needed protections for wild native trout. Others will address illegal fish introductions that will have rippling negative effects if they go unchecked. Our organization supports management actions to address non-native species and recognizes that prior to the implementation of these removal projects considerable biological information is considered.</p>	<p>Comment noted</p>
<p>Please safeguard our native trout in Montana. On the Big Hole River, our native cutthroat are a good example and they are in decline. They need our help or otherwise they'll slowly disappear. It would be a difficult conversation someday if my grandchild asked me why we let them disappear when we could have protected them. If our mule deer were in trouble and in decline, I'm guessing there would be a lot of discussion from the general public and FWP on how to save them. Why can't we do the same for our cutthroat and grayling?</p>	<p>Comment noted</p>
<p>I'd like to express my support for these efforts to protect native fish.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>It seems unreasonable to question over 20 projects, based on science, and recommended by your staff. You call them fish removal projects. It is more accurate to call them native fish conservation projects; the removal of non-native fish is one of the techniques your staff has found to be effective. I would hope you would support the scientists employed by the department.</p> <p>There seems to be a general political war with science. It is unseemly for the FWP Commissioners to participate in this sort of behavior. The FWP has a native fish conservation policy. Your scientist have collected, assessed, and presented data over many years. Then they make recommendations and plan ways to protect native fish. Many of these projects have already been through public input processes. Why would you stop, delay, or question all this work?</p> <p>If this delay is because of SB360 requesting a review of all management plans then I guess you should stop all fishing until you, who are generally not scientists, review all the data. Do you see how ridiculous this attempt to derail native fish conservation projects has become due to the 2021 legislature? You may be political appointees but have some common sense. Support your staff, support the role of scientific enquiry, and stop letting politicians micromanage you and FWP agency staff.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>
<p>I just wanted to submit my comment on the proposals for fisheries management. Not being an expert in fisheries, I support the projects FWP's fish biologists believe will further the overall fisheries in Montana with an eye towards protecting and promoting native species. The overall health of our fisheries, which relates to the overall health of our ecosystems, is so important. Ultimately it will impact the opportunities anglers have and I hope we will not be short sighted in our decision making. Again, I trust our biologists to weigh these issues and make appropriate recommendations.</p>	<p>Comment noted</p>

Supporting Comment	FWP Response to Comments
<p>I have reviewed the documentation provided for each of the 22 fish removal projects under consideration and find it woefully inadequate for the public to provide informed comment to the Commission. Absent from the table is any context whatsoever for describing the purpose and need and benefit of each project. Metrics and narrative information for each project that would have allowed the public to provide informed comment should have included:</p> <ul style="list-style-type: none"> <li>• Narrative Project Purpose and Need: The generic purposes provided in the table are insufficient to allow any meaningful comment. For example, the purpose given for the Buffalo Creek project is “Yellowstone cutthroat conservation by removal of rainbow trout.” Unfortunately, the table fails to disclose that the purpose of the project is to remove the primary source of rainbow trout hybridization to native Yellowstone cutthroat trout populations in over 300 stream miles in the Lamar River drainage in Yellowstone National Park. Why was crucial information like this excluded from this comment process?</li> <li>• Existing Condition: Existing stream miles / lake acres of secure habitat for genetically pure native fish populations in the project subbasin (8-digit HUC) relative to the total number of fish-bearing stream miles in the subbasin. “Secure habitat” refers to habitat upstream from natural or manmade barriers that exclude nonnative fish. This information is critical to describing the existing native fish species status in the subbasin and the relative importance of a given project.</li> <li>• Project native fish benefit: Stream miles and or lake acres that the project would restore for native fish and percent increase in secure occupied native fish habitat in the project subbasin (8-digit HUC).</li> <li>• Project effects to nonnative sportfish species targeted for removal: Stream miles / lake acres of occupied nonnative sportfish habitat lost (by species) and percent decrease in occupied nonnative sportfish habitat (by species) in the project subbasin (8-digit HUC).</li> </ul> <p>In the absence of this information, which could have been easily provided by your biologists and generated from existing data sources by MFWP GIS analysts, public comments will be weighted toward loss of nonnative fishing opportunity and concern over cost. Therefore, I can only conclude that this comment process is inherently biased against native fish conservation. Director Worsech claims the purpose of the new requirement for the Commission to approve fish removal projects is to increase transparency. How can a process increase transparency if the most critical pieces of project information are not disclosed to the public? The Montana Department of Fish, Wildlife and Parks has always set a high bar for public involvement and transparency through its MEPA compliance, which for fish removal projects, has included public scoping through written comment response and public meetings. MFWP environmental assessments provide the public with the level of detail needed to provide informed comment that this Commission review process is lacking. Therefore, I am greatly concerned that through this new process, the FWP Commission will prevent projects from moving forward into MEPA, thus taking away the opportunity for the public to provide informed comment. Please help me understand how this new process increases transparency?</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilized to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

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<p>It is unacceptable that the Montana Fish and Wildlife Commission should make decisions affecting the viability of native fish populations based on a flawed public comment process rather than information directly from its own fisheries biologists who are the subject experts. FWP fisheries biologists have master's degrees in fisheries management and are intimately familiar with the status of and threats to the viability of the native fish populations in their geographic responsibility areas. FWP regional managers have the authority to authorize fish removal projects, informed by their fisheries biologists, and vetted through the existing MEPA process with approval from the Fisheries Division and the Director's Office. They are intimately more familiar with the local communities they serve and the public resources they steward in their geographic areas than the FWP Commission could ever be. It is therefore counterproductive for the Commission to take decision authority away from the FWP regional managers for routine fish population manipulation actions such as those 22 projects currently under review. I am concerned that this new process creates yet another unnecessary level of government bureaucracy that breeds inefficiency and limits the ability of folks on the ground to get the important work done to conserve our native fish populations.</p> <p>Commission decisions that would deny FWP the ability to implement nonnative fish removal projects essential to native species conservation are inconsistent with the following Montana Code and administrative rules: (9) (a) The department shall implement programs that: (i) manage wildlife, fish, game, and nongame animals in a manner that prevents the need for listing under 87-5-107 or under the federal Endangered Species Act, 16 U.S.C. 1531, et seq.; (ii) manage listed species, sensitive species, or a species that is a potential candidate for listing under 87-5-107 or under the federal Endangered Species Act, 16 U.S.C. 1531, et seq., in a manner that assists in the maintenance or recovery of those species. If the State of Montana chooses to abdicate its responsibility for maintaining viable populations of native species, then future petitions for ESA listing are inevitable and Federal agencies, will be forced to exercise their authority to maintain viable native species populations under ESA and NFMA. The Montana Department of Fish, Wildlife and Parks became a leader nationwide in fish and wildlife management because it made sound data driven decisions based in science and not public opinion. These decisions have not been without opposition or controversy. The legacy of wild trout management in Montana, which created some of the world's best trout fisheries, was the result of an extremely controversial decision to experimentally stop stocking hatchery fish in sections of the Madison River to document the response in wild trout <a href="https://vimeo.com/195860643">https://vimeo.com/195860643</a> [vimeo.com]. Commissioners, I implore you to make the tough decisions needed to maintain viable populations of our native bull trout, westslope cutthroat trout, and Yellowstone cutthroat trout even if this means delegating authority for nonnative fish removal back to the regions. These native species are the true treasure of the Treasure State, which is just one of two states in the union where all three species occur. Nonnative rainbow, brown, and brook trout, though a cornerstone of wild trout fisheries in Montana, are ubiquitous throughout the cold waters of the United States. In</p>	

Supporting Comment	FWP Response to Comments
the words of a Cooke City old-timer, "you can't just catch Yellowstone cutthroat trout anywhere!"	



Supporting Comment	FWP Response to Comments
<p>MWF urges the approval of all 22 fish removal and restoration projects for the 2021 field season.</p> <p>MWF is concerned by and ultimately disagrees with the Department's recent suggestion that the Fish &amp; Wildlife Commission must approve these fish restoration projects. FWP and its regional biologists and managers have always been able to accomplish these beneficial projects while undergoing the required environmental review under Montana Environmental Protection Act (MEPA) or National Environmental Policy Act (NEPA). This recent decision jeopardizes projects that are not only time-sensitive, but have resulted from significant time and effort from FWP staff and in some cases, landowners.</p> <p>Native fish have declined in range and abundance due to some combination of habitat loss, overfishing and competition and/or hybridization with non-native fish. In many cases, it is necessary to remove the source of non-native fish, and establish populations of native fish in their historic range.</p> <p>This protects Montana's natural heritage, keeps species from being listed under ESA and provides increased sport fishing opportunities.</p> <p>Illegal or unauthorized fish introductions have been and continue to be, a major issue for native species and popular sport fisheries throughout western Montana. For several of the proposed fish removal projects, non-native fish that have been unlawfully planted in private ponds are a direct threat to sport fisheries that bring millions of dollars to local communities each year. Delaying these projects makes no sense.</p> <p>MWF is also concerned with the way in which the decision to review these projects was made. It's very apparent that there was essentially no input from anglers, guides, outfitters, or conservation organizations on this decision. Montana's passionate anglers deserve transparency with how decisions regarding native fish conservation are made.</p> <p>FWP's science-based management of wild and native trout fisheries, including efforts to restore native fish species, have made Montana one of the top fishing destinations in the world. MWF urges the Fish &amp; Wildlife Commission to approve the 22 projects being considered.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilized to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>I'm writing in favor of all the proposed native fish restoration projects already approved by the department and now up for this redundant review. All of these projects have already been through an extensive review and public comment through the EA process. Requiring further comment at this point is unnecessary and appears to me to be an effort to solicit more opposing comments. As an attorney and member of the Montana State Bar Association, I fail to see any legal rationale for this further review. No part of SB360 as passed requires this review, nor do any statutes or rules currently enacted, with the one exception Future Fisheries funding requests. The circular legal reasoning this review is based on does not have merit in my view and the view of many other long-time experts in this field.</p> <p>Montana has a long history of managing our waters for wild and native fisheries. As a current Montana fishing guide #11632, I have many clients that specifically come to Montana to catch wild and native fish, and they spend thousands of dollars annually in our rural economies. Furthermore, cutthroat trout are our state fish and a part of our Montana heritage. Brook trout are not. Rainbow trout are not. The duty of this Commission is to act in the public trust. You are trustees that hold these resources for the benefit of all, not just a few.</p> <p>This review has already delayed projects into 2022. This doesn't just affect biologists and project managers, but local contractors and rural businesses. Further delay will jeopardize these projects even further. I ask the Commission to quickly approve these projects and do their duty to protect our dwindling native trout habitat and resources.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>I am writing you today in support of Native fish projects and conservation. Fishing for wild and native trout in Montana has been central to my life and relationships since I moved to Missoula in 2002. I primarily fished the Blackfoot River during my time in Western Montana. Catching cutthroat and seeing the occasional Bull trout was quite the thrill for a kid from the Midwest, another region where rotenone is commonly used to improve fisheries. Over the years, more and more Bull trout showed themselves as conservation efforts in the drainage improved and reconnected their spawning habitat. The cutthroat we caught were impressive, although, unfortunately, most are hybridized with Rainbow trout. My wife's uncle, who grew up in Missoula, said the trout fishing in the 60s, 70s, and 80s was abysmal in the Blackfoot due to extreme environmental impacts caused by extractive industries. Today, the area is home to a robust wild and native trout population and recreation economy due to years of investment and project work by federal, state, and local agencies as well as NGOs.</p> <p>I did not know at the time that Westslope cutthroat trout, although the native species from the Gallatin drainage westward, were rare catches east of the divide until I moved to the Madison Valley in 2008. During my time in the valley, I volunteered at the Sun Ranch cutthroat brood pond and hatchery. This is an extraordinary example of how a private citizen and biologist worked together on behalf of this Species of Special Concern. Since that time, because of the efforts like these, the Department and the diligence of fisheries biologist, I've been catching more and more cutthroat in the Madison, Big Hole, and even the Jefferson. Many of my friends who guide say when clients catch cutthroat trout, their guest are really amazed since many of them have been fishing the region for years before seeing their first one.</p> <p>I was very disappointed to learn that the Department put a hold several projects for the 2021 season, jeopardizing years of collaborative effort. I read in the paper this week that the Buffalo Creek project, a tributary to the Lamar and contributor of Rainbows to these historically Yellowstone cutthroat strongholds, has been suspended for this field season. For decades, these projects have been approved at the regional level using the best available fisheries science and data. The cutthroat management decisions are directly tied to an MOU signed by FWP in 1999 with the US Fish and Wildlife Service, The United States Forest Service, Bureau of Land Management among others. Millions of federal, private, and state dollars have been invested in Montana's State Fish. The restoration economy has increased exponentially, and most importantly for landowners and water users, the effort has kept the Westslope and Yellowstone cutthroat trout off of the Endangered Species List. The later would not likely have been possible without such a concerted effort. I commend the biologists for their effort. This is a success story in the making.</p> <p>In the Dillon region, I am particularly interested in the projects on French, Selway, Andrus, and Cottonwood Creek. Besides Cottonwood Creek, the three</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503; 12.7.1504; 12.7.1505.</p>

Supporting Comment	FWP Response to Comments
<p>other projects have excellent public access and will give fishermen more options to catch the native species who have called these waters home for thousands of years. The Selway and French Creek projects will provide over 40 miles of fishable habitat each. I look forward to the day I can take my nephews to these streams and share the importance of conservation and how a cooperative effort restored the Westslope and Arctic grayling to these two streams.</p> <p>In Montana, we have a legacy of fish and wildlife that is the envy of states across the nation and the world. Now is the time to stand up and defend that legacy with science, collaboration, and thoughtful decisions to make it more resilient for the benefit of future generations.</p>	

Supporting Comment	FWP Response to Comments
<p>We are fully supportive of the State’s efforts to establish strongholds for native fish species and grow their populations! The work involved supports our programs and staff, attracts critical tourism dollars for our small businesses, and gives ranchers access to conservation dollars to improve their operations. There are three native fish projects on your list that must be allowed to continue: Doolittle Creek, French Creek and Andrus Creek. We have all invested substantial time, energy, and money into ensuring native fish expand their populations in the Big Hole. Significant landowner cooperation hinges on the success of these programs and in 2020 our work paid off with the decision by USFWS to not list the Arctic grayling. There is a tremendous amount of good will and willingness to cooperate in our watershed among ranchers, recreationists and agency personnel. To change direction on native fish projects after so much hard work would be a slap in the face to our watershed and all its stakeholders. We strongly urge you to approve all 3 projects within the Big Hole Watershed with no delay.</p> <p>The difference has been collaborative conservation. Ranchers giving up water, outfitters and guides staying off the river, and all of us communicating monthly with agency representatives and experts to understand our watershed and take actions we can all agree on. This is a stellar legacy and Montana FWPs native fish program has been a partner every step of the way. We urge you to continue native fish restoration projects in the Big Hole.</p>	<p>Comment noted</p>
<p>I urge you to withdraw the stops to the native trout restoration projects you implemented and proceed with them as planned.</p> <p>Montana’s greatest natural assets are pure water, unpolluted air and uncontaminated lands. Our two largest and most important industries, agriculture/ranching and tourism/recreation, depend on these assets. Our State’s economic future and quality of life hinge on our ability to protect our assets.</p> <p>Climate change no longer is a threat, it is reality. I read just today that Montana already suffers from widespread drought conditions so early in the year.</p> <p>These projects are much more than putting fish in water. Although that would be a worthwhile outcome in and of itself, these projects also help restore damaged riparian areas, reduce water temperatures, increase stream flow and enhance habitats, all of which benefit the assets identified above, generate economic benefits for our most important industries, and improve our quality of life as Montanans.</p> <p>Your review of the bigger picture of trout restoration policies should not come at the expense of these beneficial undertakings.</p>	<p>Authority for approval of fish removal projects lies with the Fish and Wildlife Commission. If approved in June most of the projects will proceed as planned. Moving forward a more streamlined approach for approvals will be utilised to avoid projects being put on hold during the field season. MCA 87-1-201; 87-1-301; 87-1-283; 87-1-702; 87-5-715; 87-7-1008. ARM 12.7.1501;12.7.1502; 12.7.1503;</p>

Supporting Comment	FWP Response to Comments
	12.7.1504; 12.7.1505.
A vote FOR the package	Comment noted
<p>The Endangered Species Act (ESA) has raised havoc with our ability to manage the working landscape we are obligated to enhance. Litigious activists have used the ESA as a weapon to change land use. Grayling and the Westslope are two of the native fish being used to restrict management in the SW Montana landscape. This includes grazing, irrigation, recreation and timber management. These litigants are promoting a no management agenda which is leading to many problems throughout the landscape. These native fish projects select streams that will provide the greatest amount of native fish habitat without impacting major fisheries used by the public. For those of us who understand the negative impacts of ESA abuse, these projects help remove the environmental footing used by these litigants to line their pockets with with Equal Access to Justice monies and stop management activities that enhance the landscapes we live in. Just take a look at the Klamath Falls debacle. I doubt if Legislator Lang or his sportsmen constituents have any idea of the consequences that could occur if we did not protect our fisheries from these litigants. Worse case scenario is the replacement of major fisheries. In the South Fork of the Snake IDFG are electro-fishing rainbows for the sake of the Yellowstone cutthroat. French and Doolittle Creeks have active programs and Andrus Creek is on the radar in the Big Hole drainage. These projects are important because of the abuses being made with the ESA. Change how the ESA is being used and abused and this problem would go away, but we must stand hard and fast until something changes, if it ever does.</p>	<p>The primary intent of many native fish projects is to conserve native populations and prevent Federal listing under ESA.</p>

**COMMENTS NOT IN SUPPORT**

<b>Non-Supporting Comment</b>	<b>FWP Response to Comment</b>
<p>Paul Fossler from Coram is generally against killing perfectly good trout that have been around for 100 yrs to put in native fish that he can't fish for.</p>	<p>Most fish removal projects are intended to restore native sport fisheries and improve fishing opportunity. In instances with ESA Threatened species, such as Bull Trout, efforts focus on addressing habitat needs and other limiting factors to recover to fishable populations.</p>
<p>Please, do not poison lakes and ponds. Bow's and Brooks are fun to catch are doing well. Use the money for stream improvement and restoration.</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>
<p>I have spent a considerable amount of time along Buffalo Creek over the last 5 plus years. It is my understanding that you plan to utilize helicopters and other very evasive means to kill all fish in the name of re-introducing only Cutthroat. The damage that you will do to the wilderness area far overshadows any benefit that the government (and virtually nobody else) envisions from this completely unnecessary exercise. I am truly offended that you would frivolously waste my tax dollars on such nonsense, and I will do all in my power to shed public light on this egregious waste of resources.</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>

Non-Supporting Comment	FWP Response to Comment
<p>Eradicate nonnative fish. It's a fresh paradigm. It's modern fish management.</p> <p>It's a fad, just as stocking nonnative fish was a fad, and a damn popular one in its day. It's a value judgment. What it isn't is science. Fish play a role in ecosystem management, but I doubt that the particular species matter very much. I expect to see little change or measurable improvement from poisoning other than species composition, in the minds of the indoctrinated. The insects eaten by the fish won't know the difference, and neither will the critters that eat the fish.</p> <p>Forgive me, but I'm unimpressed by FWP fish "management," which amounts to little more than fishing regulations. A few days ago, some fish died in the Madison River. The best FWP can guess is that they were stressed. Well, yeah. I would be stressed if dying, and so would you. But it's not the causal agent. That leaves us with poisoning aquatic life as policy. I can't see this as any more enlightened than a host of other dismal FWP programs, elk shoulder seasons being a recent one. The boat-stop stations will accomplish nothing...hell, last year they discovered that mussels were getting by employees dying of boredom at the stations while learning to draw pay for little work. If FWP wants to poison something, I suggest the noxious weeds on FWP-managed property. You can always spot FWP property by the prevalence of noxious weeds. East Fork Blacktail is full of Canada thistle. Up Bull River, it's a full-blown St. Johnswort on FWP land. A couple-acre fish pond here in Dillon has whitetop, knapweed, Canada thistle, musk thistle, and henbane. No place could be more accessible for weed control.</p> <p>Someone has to reign in the latest fad. It falls to you.</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain. The department is continuing to monitor the recent fish kill in the Madison River below Ennis Dam. To date, no conclusive results have been obtained. The department will continue efforts to combat noxious weeds on department lands.</p>
<p>I have been to Buffalo Forks several times and I do not agree with your decision to use helicopters, generators and motorized boats and plan dumps to remove the rainbow trout. This is a WILDERNESS AREA! This type of equipment is not allowed in the wilderness. And you plan on doing it in late summer/early fall. That is so disruptive to all wildlife in the area and to all the people who are vacationing there.</p> <p>Please reconsider this unreasonable action.</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>



Non-Supporting Comment	FWP Response to Comment
<p>I am adamantly opposed to these continuous fish poisoning projects that your department has been doing for years and now seem to be increasing the poisoning/kill projects. Brown trout numbers in SW MT are at extreme lows and not even the biologists came say why. Very recent fish die off on the Madison River, predicted lower stream flows, warmer temperature's and more fishing pressure than we have ever seen. Yet MDFWP wants to kill untold numbers of exiting fish. This is utter madness and just plain wrong. Take better care of what we have and stop trying to play God with our existing resource.</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>
<p>i think it is a bad idea to remove these rainbow trout via electro fishing . they are an established part of the ecosystem and darn fun to catch thanks for looking at this</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>
<p>What a waste of money! FWP projects should be used to improve recreational fishing. We could use better launch ramps, parking, and docks. Improve access! The attempts to remove Lake Trout have not been entirely successful. Read the study on Swan Lake. While Lake Trout were impacted, the Bull Trout population was also negatively impacted. Again, thoughtless intervention only exacerbates the problem. Additionally, the implementation has also been problematic. While fishing on Swan Lake for the last 10 years I have encountered unmarked gill nets, no signage stating active gill netting in progress, and anecdotally, the reduced populations of Lake Trout, Bull Trout, and Kokanee. Others have complained of perch depletion as well. How about concentrating on bringing back native fish in the National Parks and then stocking different lakes with game fish like Brown Trout, Tiger Muskie, Walleye or hybrids thereof, and leave the Lake Trout alone? Remember the WFP really depends on revenue from recreational fishermen, charter boats, outfitters, and fishing tourism.</p>	<p>Providing adequate public fishing access will continue to be a priority for FWP. The Lake Trout removal on Swan Lake referenced by the commentor was an experiment to determine the feasibility of removing Lake Trout in Swan Lake to assist recovery of Threatened Bull Trout. The US Fish and Wildlife Service is using the results of that study to develop an EA to suppress Lake Trout in order to recover Bull Trout. FWP will continue to strive to balance opportunity to conserve native fish while providing ample opportunity to fish for nonnative sport fish.</p>

Non-Supporting Comment	FWP Response to Comment
<p>Montana has a magnificent reputation for maintaining Blue Ribbon trout fisheries. Why waste money on projects that fail to benefit Montana fishermen when there is much to do in a more constructive and visible way?</p>	
<p>I wanted to express my hesitation about so much motorized use in the Absoroka Wilderness in the quest to kill off rainbow trout. Surely there are ways to do this, that admittedly may take more time and effort, but would be compatible with the Wilderness designation.</p> <p>I am worried that once we make an exception to motorized use in our wilderness, the next project that can be done, more easily with modern machinery, becomes that much easier to implement.</p> <p>If it's agreed that rainbows must be exorcised from Buffalo Fork, let us do it in the spirit of the wilderness. Even though it may not be as convenient and timely. These rainbows have been in Buffalo since the 1930's. If we take a couple more years to get rid of them, I think it's a good trade off to remain with the spirit of the Wilderness Act.</p>	<p>Use of helicopters and mechinized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>

Non-Supporting Comment	FWP Response to Comment
<p>I am absolutely blown away with the to me obsession that FWP seems to have with plans of depleting the rainbow and brown trout fisheries in favor of the cutthroat and dolly varden</p> <p>I believe it is a serious mistake</p> <p>I learned to fly fish on the Gelatin river about 67 years ago where I caught my first rainbow trout I couldn't believe how hard they fought when compared to the cutthroat trout I'd caught in Priest Lake,. Idaho, There wasn't much to compare,. Their only similarities were they both lived under water,. spawned and were beautiful,. The rainbow introduced me to catch and release fishing in my early teens I caught this bow who danced across the water on his tail jumped about a dozen times before I could net him and put him in my creel. I couldn't get over the fight he put up,. The more I thought about his great fight the sadder I became that I killed him,. This fish gave me the best fight I've ever had and what does he get,,,,,gets killed. Finally I said "screw it" I'm not going to keep anymore fish,. that evening I took off my net and creel,.My landing rate sky rocked,. Since then I've hardly used a net and never a creel May have kept a fish or two over the years,.</p> <p>Anyway, I fish for the fight and believe most fly fishermen do for the fighting ability of their catch,. I and most fishermen i believe would go Rainbow,. Brown,. Cutthroat/ Brook and finally DollyVarden as far as catching desirability preferences go,.I really doubt that the Cutts would be at the top of the most desirable fish to be caught in Montana list,. Ok so the cuts are supposedly the native fish. So keep some waters exclusively for them but don' ruin the bow and brown fisheries to do so.Most out of state fishermen come for the bows and browns there is that old saying of survival of the fittest and I don't think cuts are the fittest. Other wise thanks for the work you've down to keep Montana rated as the best of the west and the GREATEST in the lower 48</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>
<p>Maybe you should apply more resources to understanding the demise of the brown trout in SW Montana versus killing brook trout and replacing them with hatchery reared cutthroats.</p>	<p>FWP is working with the US Geological Survey to compile fisheries data and evaluate the primary limiting factors influencing Brown Trout populaitons in several waterbodies. The department is considering fishing regulation changes to</p>

Non-Supporting Comment	FWP Response to Comment
	reduce anling impacts on some SW Montana waterbodies.
<p>I will voice my continued opposition to the French Creek fish poisoning and the restocking of WCT and Arctic Grayling. Although it has been poisoned once in 2020, this destroyed a pristine fishery that has evolved over the years and contained fish that will survive in a natural setting and do not need an artificial setting like is being created. WCT are a weak species that do not adapt well for how the fishery has evolved in that area. Weather above the fish barrier can be transformed into a viable fishery or not, is questionable.</p>	<p>Westslope cutthroat trout are expected to provide a fishery of equal or better quality than the previous nonnative fishery in French Creek. Similar projects in McVey Creek in the Big Hole drainage and Cherry Creek in the Madison drainage found cutthroat densities that exceeded previous brook trout densities and higher growth rates of cutthroat compared to brook trout.</p>
<p>I seen that your thinking of gill netting swan lake. I hope this doesn't happen again. You will be t netting lakera but yet the bull trout are around the lakera so you will probably catch a lot of bull trout even tho your trying to save them?!?! This make so much sense NOT!!! you going to hurt the fishing is swan lake for the worse not the better! and there are tons of fishermen who go out there for the lakera! Look at flathead has it done any good nope! There are plenty of Kokanee in there trust me I'm on that lake every day! This is a wast of money and time! It will do more damage to other fish then anything! I'm so sick of you guys controlling everything and ruining fishing for us fishermen! The lake isn't in any danger it healthy and all the fish are healthy. Why don't you spend the money on road or something useful! This is the dumbest thing ever!</p>	<p>Previous Lake Trout removal on Swan Lake was an experiment to determine the feasibility of removing Lake Trout in Swan Lake to assist recovery of Threatened Bull Trout. The US Fish and Wildlife Service is using the results of that study to develop an EA to suppress Lake Trout in order to recover Bull Trout. FWP will continue to strive to balance opportunity to conserve native fish while providing ample opportunity to fish for nonnative sport fish.</p>
<p>I have spent a considerable amount of time along Buffalo Creek over the last 20 plus years. It is my understanding that you plan to utilize helicopters and other very evasive means to kill all fish in the name of re-introducing only Cutthroat. The damage that you will do to the wilderness area far overshadows any benefit that the government (and virtually nobody else) envisions from this completely unnecessary exercise. I am truly offended that you would frivolously waste my tax dollars on such nonsense, and I will do all in my power to shed public light on this egregious waste of resources.</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>

Non-Supporting Comment	FWP Response to Comment
<p>I have spent time in Buffalo Creek and I think having helicopters and boats are actually the most detrimental means I can think of to kill non native trout. I am appalled to think this is going to happen.....so unnatural to try to "get back to natural"! Please reconsider!</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>
<p>My self and my family have spent a great deal of time in Buffalo Forks, either hunting Elk or on summer trips. I do not agree with the use of mechanized dumps in the wilderness. Some form of poison most likely will be used at some point. I feel this is unacceptable as well. Please don't destroy the wilderness experience I've become accustomed to in an effort to reintroduce the Yellowstone Cut Throat.</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>
<p>I dont agree with killing the rainbows just to have cut throats . also why are you using all this equipment and disrupt wild life and hikers ? i thought no equipment in the wilderness ? seems like a waste of money I would rather catch multiple fish species not just a cutty . montana is starting to sound like California government .</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>

Non-Supporting Comment	FWP Response to Comment
<p>I've been in Buffalo Creek wilderness many times over the last 25 years. The beauty and tranquility are what makes me come to MT and spend my hard earned money vacationing there.</p> <p>To hear about this proposal for killing the trout and using mechanized methods in a pure wilderness is ludicrous to say the least. This is man trying to play GOD.</p> <p>I'm a large animal veterinarian who has worked with wildlife throughout my career. I've worked in Africa, Argentina, and the United States. I've been involved with many studies involving people and animal interference. Through the years I've learned how nature adapts to the ever changing world. It adapts for a reason. To think you can revert it back to a Pre human era is not logical or possible. Nature does what it does to survive and keep the animals, birds, and fish sustainable to the ever changing world.</p> <p>I ask you to please rethink this project.</p>	<p>Use of helicopters and mechanized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout.</p>
<p>As an avid fisherman and looking at the warming and reduced flows of our streams, please eliminate the proposed and active fish removal projects. Better to have the trout that have adapted to living in the current stream situations than nothing. Please use the funds for habitat improvement and fishing access. Thank you for the chance to comment.</p>	<p>FWP will continue to balance conservation and fishing opportunity for native fish with opportunity for nonnative sport fish. Providing adequate public access and improving fish habitat to support wild fisheries will continue to be department priorities.</p>
<p>I am opposed to fish removal projects in general. With climate change and other environmental factors, we're fortunate to have wild trout of any species. If cutthroat trout are to survive as a distinct species, let them do so without artificial intervention.</p> <p>It's rumored that smallmouth bass have a foothold in Yankee Jim Canyon on the Yellowstone River. Let's focus on that and save the general wild trout population in the Yellowstone.</p>	<p>FWP will continue to balance conservation and fishing opportunity for native fish with opportunity for nonnative sport fish. Without some level of conservation intervention, many native fish populations will be extirpated due to anthropogenic impacts from reduced flows, migration barriers, and habitat degradation.</p>
<p>It is unfortunate that lake trout were introduced into the Swan Lake ecosystem. Unfortunately the likelihood of successful removal of lake trout to a level that would provide measurable benefits to bull trout is likely unrealistic. I am a believer that an organization should use its limited resources in the best ways possible - spending staff time and \$ in a futile effort to remove lake trout seems like a waste of resources. Treatment may well have some limited success for a short period but the investment of resources necessary to provide meaningful, longterm success would likely be unrealistic - challenging the law of common sense.</p>	<p>Previous Lake Trout removal on Swan Lake was an experiment to determine the feasibility of removing Lake Trout in Swan Lake to assist recovery of Threatened Bull Trout. The US Fish and Wildlife Service is using the results of that study to develop an EA to suppress Lake Trout in order to recover Bull Trout. FWP will continue to strive to balance opportunity to conserve native fish while providing ample opportunity to fish for nonnative sport fish.</p>

Non-Supporting Comment	FWP Response to Comment
<p>For these reasons I oppose the removal at lake trout from swan lake via gill netting and other time intensive and expensive means.</p>	
<p>Stop introducing Carp and get rid of the present number of Carp we have in the USA and any species related to them. Such as the family Cyprinidae</p>	<p>FWP does not currently introduce carp or have any future plans to do so. Although not as common in Montana, <i>Cyprinidae</i> comprise one of the largest fish families in the world and are considered native in many waters of the United States.</p>
<p>This proposal includes using helicopters to deliver large bearproof containers, rotenone, gasoline, boats and some personnel placement, up to 22 landings in four days. There will be motorboats with fuel engines, gasoline pumps mounted on inflatable watercraft, and even a generator at Hidden Lake. Odors and exhaust will be present. They are going to spray water surfaces with aircraft. Grizzly bears, otters, mink, black bears and wolves will be disturbed. Bald and golden eagles, magpies, ravens, kingfishers, and American dippers will lose their fish food source for at least five years. There are plans to tear out the beaver dams (beaver were planted in the drainage in the 1970's) to expedite water flow. All this activity happens as mountain goat hunting season opens, and will obviously effect elk migration. We see no need to use helicopters, motorboats, or gas powered generators to complete this project. The same type of fish poisoning projects have been done in Wilderness Areas throughout the western US without the use of motorized equipment. The rotenone is carried in on pack stock or in back packs by the Fish, Wildlife and Parks agency employees so there is no need for helicopters. The inflatable rafts used to drag leaded garden hoses to stir up the rotenone are rowed so there is no need for motors on the boats. The rotenone antidote can be pumped into the streams using hand pumps instead of gas powered generators. We grew up in this area and have always adhered to the wilderness act and love sharing the wilderness ideal. We have attached the wilderness regulations, and do not see</p>	<p>Use of helicopters and mechinized equipment and piscicides in Buffalo Creek was determined to be the most effective way to meet project objectives while minimizing Wilderness impacts. The US Forest Service is currently evaluating impacts of the proposed project to Wilderness. The proposed project is expected to disrupt recreation during treatment, but ultimately expected to enhance Wilderness experience by conserving and providing fishing opportunity for native cutthroat trout. The rotenone "antidote" referred in the comment is called potassium permanganate, and must be delivered in a very controlled manner at a constant rate. Previous expereince on streams this size found that the use of generators to power volumetric feeder devices is the safest and most effective option to ensure that the toxic effects of rotenone are properly deactivated and confined to the treatment area.</p>

Non-Supporting Comment	FWP Response to Comment
<p>this as being an emergency requiring health and safety.</p> <p><b>PROHIBITION OF CERTAIN USES</b></p> <p>(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.</p> <p>We welcome the Yellowstone Cutthroat - but we do not welcome the invasion and disturbance of all other species in the wilderness, including man, to accomplish it. There are still limits on the Rainbow trout in the drainage, and no other methods have been even attempted yet, such as swamping the creek with Yellowstone Cutthroat or electrofishing. This is a vast drainage with many pockets of water and we can see years of lack of solitude and wildlife disturbance with this huge mechanized project.</p> <p>Please do not allow such unnecessary motorization in a designated wilderness, and let the biologists work within the confines of wilderness regulations as we all have for decades.</p>	
<p>why can,t you leave these fisherys alone ,catching brookies and rainbow are just as much fun as catching cuthroat</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>



Non-Supporting Comment	FWP Response to Comment
<p>I understand why it's being done but you need to consider that these fish are valued by some.</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>
<p>If you people at the FW&amp;P would spend as much time and money doing what the VAST majority of Montana fisherman wanted, the main focus would be to enhance the population and fishing opportunities for species like WALLEYE, PERCH and NORTHERN PIKE. Its very clear to anyone involved, that these species are not favored by the fly fisherman and out-of-state trout enthusiasts and therefore are not a priority. If a poll was taken of Montana fisherman I would venture to guess , a vast majority would be in favor of Walleye and perch introduction and enhancement rather than the current trend of planting trout and introducing trout species. This is MY take on the subject, but there are one hell of a lot of fisherman here in Montana that feel the same as I do. I am not against trout, but rather in favor of equal opportunities for both sides. It seems there is a trend to introduce trout and other species are being overlooked in Planting and introduction plans.</p>	<p>Walleye, Yellow Perch, and Northern Pike are all important sport fish and are managed as such. FWP Angler Surveys conducted in 2017 found 9.24% of anglers fished for Walleye, 2.2% fished for Yellow Perch, and 1.22% fished for Northern Pike. 41.13% fished for trout.</p>
<p>The information listed in the spreadsheet was not detailed enough to specify where on the NF Blackfoot that Piscicide would be applied. I would strongly urge you to reconsider the decision to use this product in this amazing river system. I fish the North Fork annually and have never caught anything except cutthroat and an occasional bull trout. You will destroy both with the use of the pesticide.</p>	<p>Piscicide will be applied to the North Fork drainage above the falls which is about one mile upstream of the North Fork cabin. Piscicide will be deactivated with another chemical (potassium permanganate) a short distance above the falls so to ensure that fish below the falls will not be affected in any way.</p>
<p>It would be nice if you all would stock the Wibaux fish pond with some decent fish from these removals</p>	<p>In some instances, removed fish are transported below barriers or to other nearby waterbodies to enhance fishing opportunity. Currently there are no removal projects proposed near Wibaux and the costs associated with transporting fish would be cost prohibitive.</p>

Non-Supporting Comment	FWP Response to Comment
<p>Please, please, please.....NO poison!!!!!!!!!!!! I shouldn't have to tell you why!!! 😞</p>	<p>Rotenone is considered safe for piscicide use when applied following EPA label requirements.</p>
<p>I am highly opposed to the poisoning of French Creek, one of the tributaries to the big hole, along with the rest of the rest of them.</p> <p>There was quite a fishery in French Creek drainage, then Jim Olsen poisoned it last year and put in a barrier and really destroyed a good fishery.</p> <p>It seems like that is all the fish and game wants to do anymore is destroy the animals and not take care of them like you are supposed to. And actually the cutthroat is actually a very weak specie and I don't know if it will survive in the French Creek drainage. And the grayling you can catch them anywhere in the Big Hole. Which I have over the year. I've caught them in French Creek. I'm just highly opposed to it.</p>	<p>Westslope cutthroat trout are expected to provide a fishery of equal or better quality than the previous nonnative fishery in French Creek. Similar projects in McVey Creek in the Big Hole drainage and Cherry Creek in the Madison drainage found cutthroat densities that exceeded previous brook trout densities and higher growth rates of cutthroat compared to brook trout.</p>
<p>I have been Interested/engaged in outdoor activities for most of my 81 years. I have observed the so called tree</p>	
<p>It has been made clear by the Big Hole fisheries biologist that changes in regulations and seasonal closures need to occur in an attempt to save the Brown Trout population. Please do the right thing and make it happen sooner rather than later.</p>	<p>This comment falls outside the scope of this proposal, but the department is considering changes to fishing regulations in some Brown Trout fisheries.</p>
<p>We own property at 720 Cooney Creek. We are against the fish removal. While I understand the put, it seems your removal hasn't help the numbers of Bull Trout, it has just decreased the number of fish in the creek and has had someone walking down our river.</p>	<p>Temporary fish declines were expected with this project, but native fish abundance is expected to rebound following electrofishing removal of Rainbow Trout. Removal efforts began in 2019 and monitoring will continue to determine if suppression efforts are effective.</p>

Non-Supporting Comment	FWP Response to Comment
<p>I am voicing my opinion on the pesticide poisoning (rotenone) of fish in waterways in the recent FWP proposal in regions of Montana.</p> <p>Since my health was directly affected, by the application of rotenone in a lake I live on, an alert flag raises as to the detriment of such applications. The substance affects more than gilled species. The whole area surrounding the water way is affected, including larvae of many insects on which frogs, specifically, thrive. There hasn't been a frog in Tetrault lake since the application of rotenone. Death is in the atmosphere of the water body for years.</p> <p>I would ask for your commission to have a study done more thoroughly into the time frame of reestablishing the natural life giving flora &amp; fauna of the area affected.</p>	<p>The first few years after the Tetrault Lake treatment the department was informed about the belief that the commentor's health was directly affected by the rotenone. The department was never provided with any medical records or a doctor's opinion related to the issue, and so have no scientific information on which to base a response. Regardless of the cause of the commentor's health condition, it is important to point out that the Tetrault Lake treatment was carried out in accordance with label requirements, which are designed by the US EPA to protect human health and the environment. Specific impacts to non-target organisms at Tetrault Lake were not studied, therefore the department cannot comment on observations of missing frogs. FWP policy now dictates that before-and-after monitoring on all treatments is conducted to determine effects of rotenone on non-target organisms. FWP staff have also published a paper on the impacts and recovery of amphibians in the many lakes of the South Fork Flathead project, and are preparing to publish a similar study into impacts on zooplankton in the same lakes.</p>
<p>In my 81 years I have witnessed many eradication of fish from streams and small lakes. They were mainly to remove trash fish that were damaging game fish population. But never litigation game fish that fishermen desired in favor of other game fish desired by other fishermen. I am adamantly against all of these projects with the exception of one (the one designed to remove trash fish). I enjoy fishing for a variety of fish in one local.</p>	<p>Nonnative fish, such as Rainbow Trout, Brown Trout, and Brook Trout are essential to meet the public demand for sport fishing opportunity. Nonnative fish will continue to be the primary management focus of many of Montana's most popular waterbodies. The department will continue to work with the public and partners to identify areas where native fish management is appropriate and where nonnative fish should remain.</p>

Non-Supporting Comment	FWP Response to Comment
<p>I have personally spoken with a local resident by the name of June O'Connor, a resident of Eureka Montana, who lives by Tetrault Lake which was treated back in 1998. Within a year June became very ill. In fact it changed her life. And she still suffers with health issues to this day from the rotenone poisoning applied to the lake. She also told me how it killed off all of the insect life and the frogs. Quite frankly I cannot fathom how you think this is a responsible method to eradicate non-native invasive species of fish. You make it sound as though yes, yes we acknowledge it does kill all the fish but then we just restocked the lake and everything's fine. That is very misleading. Bodies of water and waterways are themselves living organisms that support a lot of other life. It's very reckless to be even considering poisoning bodies of water and waterways. Life does not just bounce back. And it has effects for generations because of what is passed on. This should be an illegal and banned method. June told me that it was many years before it began to recover. And the frogs have never returned. And June still suffers with ill effects from the rotenone you put in that Lake.</p> <p>She also told me that her other neighbors that used to live there have since died, of cancer. She tried to tell them to go to the clinic that she was directed to go to, Unfortunately they did not heed her advice. But her life has never the same. And she had to move away for more than four years and she experienced a lot of loss due to this chain of events. Rotenone is used on monkeys in Laboratories to give them Parkinson's !! And you told people that it didn't affect human beings or mammals. Absolutely disgusting. How could you even possibly say that. And how can we possibly think it's not going to affect the wildlife that would be supported by that body of water? I asked June about birds that would have come to the lake. I guess we don't know about deer or other Wildlife that may have used that as a water source. I doubt that would be anything you would want the public to know.</p> <p>My public comment is absolutely NO rotenone treatment to our bodies of water or waterways EVER. Please stop this practice once and for all, and stop destroying lives with this terrible practice. Both human and Wildlife.</p>	<p>The Parkinson's Disease (PD) studies reviewed by the department that have elicited effects similar to but not the same as PD (called PD-like effects) were done using rats and mice. In these tests, the routes of exposure have been through intraperitoneal or intravenous injection or oral dosing with solvents and long exposure regimes (weeks to months) that are not relevant to human exposure associated with fishery uses. During a fishery rotenone treatment, exposure to the public could only come through ingestion of contaminated water or inhalation from the drift of spraying. At Tetrault Lake, no spray was used and no one was observed drinking the water or swimming in it on the day of treatment. Even if exposure via these routes occurred later, the chronic exposure necessary to elicit PD-like symptoms from swimming would be very unlikely because the concentrations of rotenone decline over time due to natural degradation. FWP did test the well of one homeowner on the lake and found no rotenone in samples taken both pre- and post-treatment. The U.S. EPA in their recent (2020) review of toxicity of rotenone to humans found that long-term consumption of fish or drinking-water bearing residues of rotenone is "extremely unlikely." This risk is so low that the EPA allows for public access to waters immediately after the treatment is complete when the application rate is at or less than 1.8 ppm (the same rate used on Tetrault Lake). With regard to PD, they felt there "was insufficient epidemiological evidence to conclude that there is a clear associative or causal relationship between rotenone exposure and PD."</p>