

From: [The Falls](#)
To: [FWP Fish Comments](#)
Subject: [EXTERNAL] Swan Lake
Date: Wednesday, June 9, 2021 7:07:02 AM
Attachments: [Governor Gianforte.pdf](#)

Attached is a letter I wrote to the governor about the proposed netting in Swan Lake. I hope that you will reconsider this idea, even the fishery biologist here in Kalispell think it is a mistake.

Thank you

John Peterson
406 249 6868
Jwpeterson22@gmail.com

May 28, 2021

Re: State plans numerous fish removal projects

Honorable Governor Gianforte:

There was a recent news paper article about Montana Fish, Wildlife and Parks seeking public comments on plans to remove fish from different bodies of water in Montana. I have attached a partial copy of this article. One of bodies of water is Swan Lake located in Lake County. My interest is that I have a home on the lake and fish it all the time for the lake trout as do many other anglers.

Montana FWP like to say that before the lake trout migrated up Swan River to Swan Lake that we had a very strong Bull Trout fishery. Well the truth is that if you went out fishing for the Bull Trout you were lucky to catch one a week. Now with the Lake Trout we are catching 5 a day! Here are a few photos of my kid's and grandkid's fish from last year. They are all coming home this year to catch more.



Montana Fish, Wildlife and Parks tried for over 8 years to eliminate the lake trout by netting without any success. All they do is kill some of the lake trout and reduce the quality of fishing we currently enjoy. The last year of netting they killed over 100 bull trout which are the species they want to protect.

The local fish biologist, Leo Rosenthal was the lead on the 8 years of netting. Nobody knows the lake trout in Swan Lake better than him! I talked to him the other day about the US Fish and Wildlife's plans to start up this program again with MT FWP assistance. To quote Leo "it would be dubious at best that it will work and may actually harm the fishery". He also stated that the US Fish and Wildlife hasn't even started and EIS, yet they are planning to start killing our lake this year. Leo is a great source of facts, his number is 406-544-3058.

I have participated in the "public comment sessions" before only to find out that the decisions have already been made. That is why I am writing to you. You seem to see through all the BS and do what is right. I believe that comments need to be in by June 3rd and the virtual meeting is on June 24th. [no face to face allowed]

What I am requesting is that you contact Leo and get the facts since he has not been asked to make comments on this issue. [why ask the people who really know the facts] If you contact MT FWP, they will have to listen.

I want to thank you in advance for your assistance and for all the work you do to promote family values like fishing, hunting and hiking in our great state of Montana. If you want any more information please contact me.

John W. Peterson

234 White Pine Road, Kalispell, MT

406-249-6868

Jwpeterson22@gmail.com

From: [Kevin mahoney](#)
To: [FWP Fish Comments](#)
Subject: [EXTERNAL] Fish restoration
Date: Tuesday, June 8, 2021 3:49:18 AM

Please continue preserving our native fish projects.

Sent from my iPhone

From: [Conard, Ben](#)
To: [FWP Fish Comments](#)
Cc: [Ryce, Eileen](#); [Brewer, Dan](#); [Fredenberg, Carter R](#); [Bush, Jodi](#)
Subject: [EXTERNAL] USFWS comments on fish removal projects
Date: Monday, June 7, 2021 11:14:05 AM
Attachments: [20210607_LTR_FWS comments on fish removal projects.pdf](#)

Please accept the attached comments from the U.S. Fish and Wildlife Service Montana Ecological Services Office, regarding FWP's request for comment on fish removal projects. We regret our delay in submitting the comments.

Thank you, -Ben

[Ben Conard](#)
[Deputy Office Supervisor](#)
[U.S. Fish and Wildlife Service](#)
[Montana Ecological Services Office](#)
[780 Creston Hatchery Road](#)
[Kalispell, Montana 59901](#)
[phone: \(406\) 758-6882](#)



United States Department of the Interior

Fish and Wildlife Service

Montana Ecological Services Office

585 Shepherd Way, Suite 1

Helena, Montana 59601-6287

Phone: (406) 449-5225, Fax: (406) 449-5339



In Reply refer to:
File: M.20 MTFWP
FWS comments on fish removal projects

June 7, 2021

Montana Fish, Wildlife & Parks
Attn: Fisheries Division
1420 East Sixth Avenue
P.O. Box 200701
Helena, MT 59620-0701
fwfishcomments@mt.gov

Thank you for the opportunity to comment on fish removal projects at the behest of the Fish and Wildlife Commission request for review of pending projects.

The U.S. Fish and Wildlife Service (Service) has a long history of supporting Montana Fish, Wildlife & Parks' (FWP) projects that remove undesirable or invasive fish species. These projects improve the uniqueness and quality of sport fisheries, protect species with elevated conservation risk, and help preclude the need to list species under the Endangered Species Act (Act). In particular, we appreciate such projects that advance the recovery of bull trout (*Salvelinus confluentus*), which are listed as threatened under the Act.

The Service will focus our comments on the Swan Lake project in FWP Region 1.

The Swan Valley watershed is amongst the highest priority watersheds for protection and recovery of bull trout. Indeed, Swan Lake remains one of the few places where anglers may actively fish for bull trout. At the time of bull trout listing, this core area was one of only three complex core areas in Montana that was considered at or above recovery standards. Since that time, the status has declined and the singular, readily-identifiable primary threat is the presence of non-native fish, especially lake trout. At this time, other threats are still at manageable levels and the bull trout population is relatively secure, but there's a high risk that without action it may not persist in that status.

The Swan Valley Bull Trout Working Group (SVBTWG) is a collaboration of agencies and stakeholders, including FWP, the Service, the U.S. Forest Service (USFS), the Confederated Salish and Kootenai Tribes (CSKT), Montana State University (MSU), and Trout Unlimited (TU). For more than a decade, the SVBTWG cobbled together year-to-year funding to implement an experimental lake trout suppression program in Swan Lake. Thru 2016, the SVBTWG expended more than \$1.1 million on the experimental phase of this project with another \$450,000 in in-kind contributions (2008-2016). About half was contributed by FWP, 40 percent by USFS, and the remainder by a combination of FWS, Montana DNRC, and TU. Much was learned, but the experimental period ended, and state and federal agencies lacked the authorization or budget to continue.

FWP committed to a monitoring plan, separate from a suppression program, which would allow managers to detect changes to the lake trout and bull trout populations over time. The Service and other members of the SVBTWG believe continued lake trout suppression is critical to avoid the inevitability of more difficult and costly lake trout removal in the future, and irreparable harm to bull trout populations.

After closely consulting with FWP, the Service agreed to propose and lead a lake trout suppression program and to complete the appropriate National Environmental Policy Act (NEPA) process, including public review and comment. The Service has expended \$50K to draft an environmental assessment and we worked intensely with FWP at every step of the way. The draft proposal is arguably one of the most carefully crafted non-native suppression programs ever proposed; built on more than a decade of experimental suppression, modeling, adjustment, and collaboration with FWP and other partners. We were close to vetting our draft EA internally and then proceeding with publication and public comment when your request for comment on fish removal projects came forth.

Concurrently, the Service funded a \$135K cooperative research project (CRI Grant) focused on identifying and mapping all lake trout spawning locations to better inform any future suppression efforts. Field work is complete and research results are pending. Dr. Christopher Guy of the Montana Cooperative Fishery Research Unit at Montana State University is supervising the research and has provided scientific support analyzing metrics of the suppression activities for the SVBTWG.

The Federal government has invested hundreds of millions of dollars toward land acquisition and protection in the Swan Valley to benefit a spectrum of resources including threatened bull trout. Likewise, partners such as Montana DNRC, Weyerhaeuser (formerly Plum Creek), FWP, The Nature Conservancy, and other NGO's have considerable program and fund investments in the valley.

Without lake trout suppression, one of the highest profile and most robust bull trout populations in the Columbia Headwaters Recovery Unit will likely decline precipitously due to the threat posed by non-native lake trout. At this time, bull trout populations in the Headwaters of the Columbia River Drainage are exhibiting dramatic declines throughout many of their complex core areas. The potential loss of the Swan Lake Core Area resulting from inaction would jeopardize our mutual long-term goal of achieving bull trout recovery; would threaten the continued opportunity for anglers to actively fish for bull trout in Swan Lake; and would externalize the cost in many ways to land and resource management agencies, private landowners, and the public, as the decision space affecting bull trout continues to shrink and recovery of bull trout becomes harder to achieve.

We are not asking the Fish and Wildlife Commission or FWP to endorse the Swan Lake project at this point, without a complete Environmental Assessment before you. Rather, we encourage the Fish and Wildlife Commission and FWP to defer judgement on the project while we proceed with a transparent NEPA process and public comment period. Thank you for your consideration.

Sincerely,



Jodi L. Bush,
Office Supervisor

cc: SVBTWG members

From: [Len Jemie Wright](#)
To: [FWP Fish Comments](#)
Subject: [EXTERNAL] Buffalo Fork Fish Kill
Date: Monday, June 7, 2021 10:38:31 AM

To Whom it May Concern~

I wanted to express my concern about the use of motorized equipment in the Absaroka Beartooth Wilderness during the killing off of the rainbow trout. I feel very strongly that the use of motorized equipment should not be used. You're slapping the face of every true grit outdoors man that has ever endured the hard work, blood sweat and tears of doing everything by hand in the wild.

The moment one project yields to the use of motorized equipment every other project is going to do the same. Then there goes the most treasured part of the wild and wilderness.

Let's not fall into the pit of modern technology, let this project still be about the wilderness and keeping the Wilderness Wild!!

I grew up in the mountains. There's not much more important to my family than keeping the mountain way of life and experience alive and thriving for my children and future generations. The guests that will be in the mountains during the fish killing project go there to get away from the noise and disruptions and not to experience them.

Helicopters in the mountains should be kept for emergency retrieval situations and life saving efforts not to make the job easier. When I hear the helicopter sound in the mountains I instantly think someone is injured or a fire has started.

The beauty of the wild is being surrounded by nature and the only sounds you hear is the chopping of wood, cross cut saws cutting wood, birds chirping and your stock stomping and swatting at flies not the sounds of motors.

If you really have to kill off the fish, let the people involved in this project learn to do what the many wonderful mountain men and women have done for countless years. Work with their hands and use horses and mules to carry their equipment. Let them put in the extra time and effort to preserve the wilderness and not have motorized equipment doing the work for them in the spirit of the Wilderness!!

Thank you!!
Jemie Wright
PO Box 2202
Livingston, MT 59047

From: [FWP General](#)
To: [FWP Fishing](#)
Subject: FW: [EXTERNAL] nonnative removal
Date: Monday, June 7, 2021 8:26:03 AM

From: philip light <phildlight@gmail.com>
Sent: Monday, June 7, 2021 7:29 AM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] nonnative removal

I recently read an article about the controversy surrounding several nonnative fish removal projects in the state. I live in Pennsylvania but wanted to chime in as a nonresident because I think it's important to consider what drives us, easterners, to your incredible state. I'll admit that it's been too many years since I've visited Montana to fish, but I was recently doing some planning to change that.

It's worth noting that my focus this time would be in search of native cutthroat trout. In general, I think a lot of us east coast folks go west to fish for your incredible native salmonid species. I have no interest anymore in traveling considerable distances to fish for stocked fish or nonnative trout. We have plenty of wild brown trout in PA, so it wouldn't make a lot of sense for me to fly more than halfway across the country to fish for brown trout.

I always hold Montana up as a shining example of how fisheries management should be done. A large part of that is your willingness to make tough decisions that may not be favorable to all anglers. Whether it's the cessation of stocking, or manual removal of nonnative species, I've always commended MTFWP for their ability to do what's right for the resource despite the cries of angry anglers who want fish planted or nonnative species for enjoyment.

We're losing a lot of our native fish species here in the east due to the heavy stocking and proliferation of non-native species. Words like rotenone or manual removal are foreign and met with strong opposition here. I strongly believe that as our native fish become harder to find, it will drive a sort of renaissance of anglers who spend considerable time and money pursuing them. I hope MTFWP stays the course for the sake of our native fish species and the future.

Best,

Philip Light

From: [Daniel Beyer](#)
To: [FWP Fish Comments](#)
Subject: [EXTERNAL] Please do not cut at funding for this invasive/introduced fish removal project.
Date: Friday, June 4, 2021 3:28:33 PM

The native fish species recovery is vital for the ecological and economic value of the outdoor wildlife recreation in the region. Please do not cut funding for the invasive/introduced fish removal in order to support the recovery of native resident cutthroat trout!

Thank you!
Daniel

Sent from my iPhone