

From: [Kristopher George](#)
To: [Kilbreath, Phillip](#)
Subject: [EXTERNAL] Bolder river comments
Date: Thursday, February 10, 2022 8:25:31 AM

I am opposed to any restrictions to public water due to pressure from private landowners for any reason. The restrictions of public lands, and water, no matter the size of the resources, sets a dangerous precedent. A limitation opportunity without Science-based decision, is poor Decision making and shows FWP is willing to yield local public pressure. If there was science showing that the resources are negatively affected it may be a different story.

Thanks for your time.

Sent from my iPad

From: [Clayton Elliott](#)
To: [Kilbreath, Phillip](#)
Cc: [David Brooks](#)
Subject: [EXTERNAL] MTU Comments on adoption of NEW RULE I, Boulder River motorized use
Date: Friday, February 11, 2022 2:30:03 PM
Attachments: [image001.png](#)
[2022-1-28 MTUComments BoulderRiverRnd2 FNL.pdf](#)

Mr. Kilbreath –

Please find attached the public comments from Montana Trout Unlimited on the proposed NEW RULE I concerning recreational use on the Boulder River. Please don't hesitate to reach out if you have any questions or need additional information. Thank you for all your hard work on this matter.

Respectfully,

Clayton

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Clayton Elliott
Conservation and Government Affairs Director
Montana Trout Unlimited
clayton@montanatu.org
15 S. Excelsior Ave
Butte, Montana 59701
o: 406-543-0054
c: 307-272-6298
www.montanatu.org [montanatu.org]





February 8, 2022

Montana Trout Unlimited
312 North Higgins, Suite 200
P.O. Box 7186
Missoula, Montana 59807

Montana Fish, Wildlife, and Parks Enforcement Division
ATTN: Phil Kilbreath
P.O. Box 200701
Helena, Montana 59620-0701

Re: In the matter of the adoption of NEW RULE I pertaining to recreational use on the Boulder River

Mr. Kilbreath:

Thank you for the opportunity to provide written comments on the proposed NEW RULE I pertaining to recreational use on the Boulder River. We have reviewed the proposal put forward by the work group and accepted by the Fish and Wildlife Commission, and we wish to go on record opposing the adoption of this proposed new rule within the ARM. We were unable to attend the public meeting in this matter, but please consider the following as our official public comment.

Founded in 1964, Montana Trout Unlimited (MTU) is the only statewide grassroots organization dedicated solely to conserving, protecting, and restoring Montana's coldwater fisheries. MTU is comprised of 13 chapters across the state, including the Joe Brooks and Magic City Flyfishers Chapters in the area, and represents approximately 5,000 members and friends. Many of our members are conservation-minded anglers who have an active interest in the health and recreational values of our state's rivers and streams.

First, we appreciate the efforts of the Commission and the stakeholder work group that sought to find compromise between competing interests in this matter. That task is never easy, but it is to be commended. At the end of the day, we must balance the product of those efforts with our organization's mission to conserve and protect the habitats that support our state's coldwater fisheries. Unfortunately, we cannot support the new rule as proposed.

As an organization we are not opposed to motorized watercraft in general; we believe that there is a time and place where those multiple uses can be balanced between recreation, agriculture, safety, and protection of the riparian resource. The Boulder River is unfortunately just not one of those places. We oppose this proposed new rule because it does not go far

enough to preserve fragile riparian ecosystems and wildlife within this system and could promote the spread of aquatic invasive species. Further, based on our conversations this proposal does not have broad support from the local landowners and communities along the Boulder River. For further detail, please refer to MTU's comments on the original petition to prohibit motorized watercraft from the Boulder River ("2020-12-03 MTU comment on Boulder petition").

Please do not hesitate to contact us with any questions, or if you need additional information regarding the comments that we have submitted (via email at clayton@montanatu.org or by phone at 406-543-0054). Again, we thank you for the opportunity to provide public comment on this important topic.

Respectfully,



David Brooks
Executive Director
Montana Trout Unlimited



Clayton Elliott
Conservation Director
Montana Trout Unlimited

From: [Johnson, Leif \(USAMT\)](#)
To: [Kilbreath, Phillip](#)
Cc: [Smith, Mark \(USAMT\)](#)
Subject: [EXTERNAL] Proposed rule allowing motorized access to the lower Boulder
Date: Saturday, January 15, 2022 5:17:10 PM

I have a residence on the upper Boulder and have recreated on the Boulder regularly since 1995. The proposed rule allowing motorized use on the lower Boulder should be rejected for the following reasons:

1. Outside of the runoff peak, the lower Boulder below Natural Bridge runs at around 100 cfs or less for much of the summer and fall. Although the river provides good fishing opportunities, the fish are concentrated in riffle and bank habitat that is in many places only a few feet wide. Allowing motorized use of a river that small would destroy the fishing for those willing to walk within the high water marks to access fishing. There simply is no room for motor boats. Allowing that use will foreclose wade fishing in the proposed sections. Moreover, motorboats will directly clash with the floating community, which makes extensive use of the Boulder during the several week period as water levels drop below 1000 cfs as the runoff concludes, which is usually the early part of July.
2. Use of motorboats on such small water will stress the fishery and reduce recruitment of new classes of fish that struggle to survive during the period of proposed motorboat use. The rule would apparently allow the use of 2-stroke engines in that section. These engines would foul otherwise pristine trout habitat with gas and oil. They will also disturb other uses with noise.
3. The lower Boulder is pristine wildlife habitat frequented by eagles, elk, bear, bobcats, cougars, otters, and other animals sensitive to motorized use and intrusion. Allowing motorized use would reduce the habitat value of the critical riparian corridor and negatively impact all species of wildlife.
4. I actively fish the entire lower Boulder from the Natural Bridge to the mouth of the river near Big Timber. The proponents of motorized use seem to think that there is no access to portions of the lower river and that is not true. A fisherman willing to walk can fish the entire lower Boulder and I often do. The access issue is simply not accurate.
5. Ample opportunities for use of motorized craft exist on numerous other Montana waterways that are more suitable for motor boats. The proposed access rule on the Boulder will foreclose other uses and diminish the waterway as a pristine cold water fishery. As we begin to see the effects of a warming climate on cold water fisheries, motorized access will exacerbate the negative impacts of low flows and warm water temperatures on the trout population. The proposed rule is short-sighted, unwise, and should be rejected.

Leif Johnson
Toni Tease
44 Clark Ave
Billings, MT, 59101

Sent from my iPad

From: [Tyson McLean](#)
To: [Kilbreath, Phillip](#)
Subject: [EXTERNAL] Subject: Proposed rule allowing motorized access to the lower Boulder
Date: Tuesday, January 25, 2022 9:53:49 AM

I have fished the pristine Boulder river on a number of occasions since 2012. As a Missoula area resident and a frequent fisherman on many of Montana's western rivers, I can attest that the Boulder river is special and the proposed rule allowing motorized use anywhere on its reaches should be rejected. I offer the following reasons for rejecting the proposed rule allowing motorized use on the lower Boulder:

1. Motorized use would materially alter the Boulder River and the serenity one experiences wade and float fishing it. The sounds, smells, and pollution created by motorboats would harm native trout populations, displace wildlife, and destroy habitat--it will negatively impact the river, the creatures that depend on it, and the people that presently enjoy the calm and incredible recreational opportunity the Boulder river provides.
2. Wade and float fishing opportunities are abundant on the Boulder River. Montana access laws allow anglers to fish anywhere below the ordinary high water mark and require access to rivers at any public bridge or county-right of way that crosses over surface waters. Montana anglers know, understand, and use this law to fish waters that do not have regular boat ramps and fishing access sites.
3. To point number 2, Montana has an abundance of lakes and rivers that permit motorboat access. As a Montana native, I can attest that the Missouri River and the various lakes it creates spread across our state and offer incredible diversity for motorboats to enjoy.
4. Motorboats can spread invasive species that can be hidden within the engine and hull of the boat.
5. A personal story: I started fishing below Houser Dam near Helena, Montana in 2015. I saw one or two jet boats a day in the spring and hardly ever saw them in the summer months. Today, it is common to see 3-5 jet boats at any time of year jetting back and forth in that section of the river. The hum of the engine, the casted waves, and the general lack of etiquette shown to wade fisherman creates tensions between motorboats and wade fisherman and greatly detracts from the overall experience of getting out in Montana to seek my center and calm. Please do not let motorized use on the lower Boulder. Montana needs its calming and therapeutic rivers.

Respectfully,

Tyson McLean

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Tyson A. McLean
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From: [FWP General](#)
To: [Kilbreath, Phillip](#)
Subject: FW: [EXTERNAL] Boats
Date: Tuesday, December 14, 2021 12:02:25 PM

-----Original Message-----

From: Tyler Molzahn <tyler_molzahn@yahoo.com>
Sent: Tuesday, December 14, 2021 12:01 PM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] Boats

Tyler Molzahn Motor boats on boulder river??? I am against any motor boats , its a mess now with outfitters and floaters , They do not call it boulder river for just the name , ?!

From: [FWP General](#)
To: [Kilbreath, Phillip](#)
Subject: FW: boulder river motorized use rule
Date: Wednesday, December 15, 2021 8:21:54 AM

From: Johnson, Leif (USAMT) <Leif.Johnson@usdoj.gov>
Sent: Wednesday, December 15, 2021 7:55 AM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] boulder river motorized use rule

I would like to object as strenuously as possible to the proposed rule allowing motorized boats on the Boulder. This is insane and will destroy a pristine fishery and exclude current uses. Is there somewhere that I can make this comment and objection?

Leif M. Johnson
44 Clark Av.
Billings, MT 59101

From: [Pieske, Shawna](#) on behalf of [FWP General](#)
To: [Kilbreath, Phillip](#)
Subject: FW: Say NO to motorized boats on the Boulder River
Date: Thursday, December 16, 2021 4:08:51 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Shawna Pieske 
Commission Secretary
Director's Office
[Montana Fish, Wildlife & Parks](#)

P.O. Box 200701
Helena, MT 59620-0701
Ph: 406- 444-7826 or 406-444-3186
[Montana FWP](#) | [Montana Outdoors Magazine](#)



From: Smith, Mark (USAMT) <Mark.Smith3@usdoj.gov>
Sent: Thursday, December 16, 2021 12:43 PM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] Say NO to motorized boats on the Boulder River

Hello.

I write to comment on the proposal to allow motorized boats on the Boulder River up to the level of Natural Bridge. As an avid trout fisherman and public recreationist this is a staggeringly bad idea. During the interval of proposed use river levels fluctuate dramatically, with some stretches (especially in the upper river) becoming substantially dewatered. Besides creating areas where any kind of motorized boat passage would be impossible, motorized use in these areas also imperils fish, fish habitat, and spawning grounds. The hulls of these motorized craft will plow through sensitive riverbeds, with far greater cumulative impacts on the river and its dependent wildlife. The decibels of internal combustion engines will chase away the deer, elk, waterfowl, and raptors that I have encountered and that have made this river so special in the past.

What makes this river special is its wildness. The fact that you can stand in the middle of this river and NOT be buzzed by dozens of passing watercraft (as is the case with the Big Horn and Madison), hearing only the babble of the water, and the prehistoric croaking of the sandhill cranes. This is why people want to access and fish there. Allowing motorized use, however, inevitably diminishes that very wildness. You will kill the very thing that makes it special.

Please consider alternatives that (a) eliminate motorized use altogether, and / or (b) limit motorized use to lower stretches (e.g., below Boulder Forks fishing access), when river flows are above a certain CFS (sufficient to avoid impacts to riverbed and spawning habitat).

Thanks.

Mark Smith
Billings, MT
krabopple@gmail.com