



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Montana Ecological Services Office
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October 9, 2026

Montana Fish and Wildlife Commission
c/o Commission Liaison, Montana Fish, Wildlife & Parks
P.O. Box 200701
Helena, Montana 59620-0701

Subject: Comments on Commissioner Wargo Amendments #2 (South Fork Flathead / Hungry Horse Reservoir) and #4 (Flathead Lake) to the 2027–2028 Fishing Regulation Proposals

Dear Chair and Commissioners:

The U.S. Fish and Wildlife Service (Service) has reviewed Amendments #2 and #4 to the proposed 2027–2028 fishing regulations and has concerns about both as they relate to bull trout and westslope cutthroat trout conservation. Amendment #4 would cut the Flathead Lake lake trout daily limit from 100 to 20 and widen the protected slot from 30–36 to 26–36 inches, reducing harvest of the nonnative predator the Service has identified as the primary threat to ESA-listed bull trout in the lake. Amendment #2 would move the opening of the South Fork Flathead catch-and-release bull trout season from July 1 back to the third Saturday in May, reversing the 2024 reduction adopted after record-low redd counts. We encourage the Commission to proceed with Montana Fish, Wildlife & Parks (FWP) Proposals 9–11 as presented and Proposal 13 or a more conservative alternative, and we offer the following for the Commission's consideration before acting on the amendments.

Amendment #4: Flathead Lake

Lake trout are the primary threat to Flathead Lake bull trout. The 2015 Bull Trout Recovery Plan names Flathead Lake as a complex core area where lake trout are "the dominant primary threat," and recovery depends on primary threats being "effectively managed" in 75 percent of the Columbia Headwaters Recovery Unit's core areas (USFWS 2015a, pp. viii, 15). The Service's 2024 Species Status Assessment (SSA) finds that the Mysis-driven lake trout expansion and kokanee collapse "caused the subsequent rapid decline in bull trout, demonstrated by a 75 percent decline in redd counts from the 1980's levels," that gains since "have stagnated," and that "nonnative lake trout predation and competition remains a substantial threat" (USFWS 2024a, pp. I-79–I-80). Index redd counts averaged 392 in the 1980s and 146 in 2017–2022 (p. H-24). The core area holds 27 percent of the cold-water habitat projected to remain in the recovery unit by 2080 (USFWS 2015b, p. D-37).

The SSA ties the core area's future to nonnative fish management. Flathead Lake currently rates High resiliency (3.70; USFWS 2024a, Table 5, p. 106). If nonnative fish management "continue[s] at the same level" in a warmer climate it falls to Medium (3.28); under a "decrease in the implementation and effectiveness of nonnative fish management" it falls further (2.95); under a "significant reduction" it falls to Low (2.52). Only increased nonnative fish management reaches Very High (Table 6, p. 121; Appendix G). The SSA also observes that "in some areas, nonnative fish are preferred to bull trout by the public resulting in a lack of support for their control" (p. 85).

The 26–36 inch slot protects the lake trout that eat native fish. The Service does not favor protective slot limits on lake trout in bull trout waters, including the existing 30–36 inch slot, because they shelter the fish most responsible for predation; widening this one would make it worse. In Flathead Lake, Mysis dominates the diet of lake trout up to about 24 inches; above that, fish dominate (Ellis et al. 2011; Beauchamp et al. 2006). Modeling for the lake found that a 75 percent reduction in adult lake trout would reduce predation on bull trout by 90 percent, and that total fishing effort would need to roughly triple to get there (Hansen et al. 2016). A multi-agency review that included Flathead biologists found that minimum length limits on lake trout increased predation on native and forage fish and that managers across the West had liberalized or rescinded them (Martinez et al. 2009). The amendment proposes that sparing adults will control juveniles through cannibalism, while conceding the effect "has not been adequately quantified." Modeling for Swan Lake found that "harvesting only adults caused the population to increase above carrying capacity" and that "simultaneous harvest of juveniles and adults was required to cause the population to collapse" (Syslo et al. 2013). The declining mean length and rising juvenile catch the amendment cites are the expected response to reduced adult density, not evidence of failure (Koel et al. 2020; Syslo et al. 2021).

Relaxing suppression produces rebound; sustaining it works. Swan Lake netting stopped in 2016; by 2024 the lake trout population "may be approaching carrying capacity" and bull trout redd counts "have continued to decline" (USFWS 2024c, pp. 7–8). Lake Pend Oreille sustained removal, cut adult lake trout 64 percent, and restored kokanee, trophy rainbow trout and bull trout (Dux et al. 2019). A 20-fish limit would remove the top of the Mack Days harvest, which FWP reports still regularly reaches 100-fish limits; the Flathead Valley Chapter of Trout Unlimited warns it could collapse the tournament. Any shortfall would have to be made up by agency netting, and the amendment itself raises bycatch in suppression nets as a concern.

Kokanee reintroduction would feed the predator. More than 11 million kokanee were stocked in 1989–1999; lake trout ate 29 percent of one release within eight weeks and an estimated 87 percent of 5.8 million stocked in 1993–1997 within a year (Deleray et al. 1995; Martinez et al. 2009). The Co-Management Plan recorded that the effort "failed" (MFWP and CSKT 2000, p. 14). Pend Oreille kokanee recovered only after adult lake trout were cut 64 percent. FWP's response to the amendment already commits to evaluating the biological, operational and financial feasibility of kokanee restoration with CSKT and other partners. That evaluation can proceed under the current regulations; a 5-fish kokanee limit has no effect on a population that does not presently exist in the lake, and reduced lake trout harvest would only worsen the conditions any restoration would face.

Westslope cutthroat trout. The Service, FWP and CSKT signed the 2007 Cutthroat Trout Conservation Agreement, committing to "reduce short-term risks of genetic introgression,

competition and predation by nonnative fish species" and to "conserve migratory life histories" (MFWP et al. 2007, p. 21). Flathead Lake's adfluvial cutthroat population has declined by roughly two-thirds since 1981 (CSKT 2025) and faces accelerating rainbow trout introgression in its tributaries (Muhlfeld et al. 2014). Keeping cutthroat catch-and-release while protecting 26–36 inch lake trout asks the native species to carry the whole trade-off.

Co-management. CSKT adopted the 100-fish limit and 30–36 inch slot on the south half of the lake effective March 2026, and FWP reports the Tribes now release lake trout over 30 inches from suppression nets to match. Amendment #4 would reimpose a split regulation within a year, without tribal concurrence, on a program the Tribes fund and operate under a 2014 EIS (CSKT 2014).

Amendment #2: South Fork Flathead and Hungry Horse Reservoir

The Service supports FWP's response. The Hungry Horse Reservoir core area is isolated above the dam and free of lake trout, and its headwaters lie entirely in wilderness; the SSA identifies one threat to it, "increased recreational pressure is increasing the number of bull trout being handled and possibly handling-related mortality" (USFWS 2024a, Appendix I, CH18; p. H-26). FWP's data bear this out: estimated bull trout angling pressure on the South Fork tripled from 728 angler-days in 2014 to 2,228 in 2023, estimated catch rose from 284 to 582, and 44 percent of bull trout are caught in May and June, 59 percent in the lowest zone where migrating adults stage (MFWP 2024). Redd counts reached their lowest on record in 2023 and again in 2024, about 48 percent of the long-term average. The Commission shortened the season to July in 2024 for this reason, and Proposal 13 continues in that direction by narrowing reservoir harvest to a July 1–September 1 season. The Service supports the direction of Proposal 13; the specifics of any remaining harvest are best settled through the permit discussions described below.

Amendment #2 would move in the other direction. Reopening May and June would restore handling of migrating fish in the reach and months where catch is highest, on a population at a record low. The boundary move and bait prohibition are offered as offsets; FWP is correct that both rest on anecdotal reports and that the 2020 single-pointed-hook rule already addressed deep hooking. The Service does not object to either measure on its own, but neither compensates for reopening the lower river during the spring migration.

We also want to put this fishery in context for the Commission. The Hungry Horse/South Fork catch-card fishery operates under an ESA section 10(a)(1)(A) permit issued to FWP. It is one of only a handful of places in the coterminous United States where the Service has authorized intentional angling for bull trout, and it exists because the population was strong enough to support it. Record-low redd counts and tripled angling pressure have brought the Service and FWP into ongoing discussions about the fishery, and both agencies have been moving toward more conservative management as a result. That direction is what keeps a permitted fishery viable. Changes that add handling during the migration, however well intended, make the case for continuing the permit harder to sustain and put this opportunity at risk for the anglers who value it most. We would much rather see the fishery protected by the kind of adjustments FWP has proposed than lost to continued decline.

Recommendation

We appreciate the Commission's consideration of these concerns. The Service recommends that the Commission adopt Proposals 9–11; adopt Proposal 13 or a more conservative alternative; retain the 100-fish Flathead Lake lake trout limit and, at a minimum, the current slot; and retain the July-only South Fork bull trout season. We share the Commissioner's interest in measurable objectives and decision points for Flathead Lake; those belong in the Statewide Fisheries Management Plan and the FWP–CSKT co-management process, where the Service will participate. Questions may be directed to Carter Fredenberg, USFWS Fisheries Biologist, Kalispell Suboffice, at Carter_fredenberg@fws.gov.

Sincerely,

Amity Bass

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Field Supervisor

cc: CSKT Natural Resources Department; MFWP Region 1 Fisheries Program; MFWP Fisheries Division Administrator

Literature cited

- Beauchamp, D.A., et al. 2006. Trophic interactions of nonnative lake trout and lake whitefish in the Flathead Lake food web. Report to CSKT. University of Washington, Seattle.
- Confederated Salish and Kootenai Tribes (CSKT). 2014. Proposed Strategies to Benefit Native Species by Reducing the Abundance of Lake Trout in Flathead Lake, Montana: Final EIS and Implementation Plan. Pablo, Montana.
- CSKT. 2025. [Native Fish Keepers](#). Pablo, Montana.
- Deleray, M., W. Fredenberg, and B. Hansen. 1995. [Kokanee stocking and monitoring, Flathead Lake, 1993–1994](#). Report to Bonneville Power Administration.
- Dux, A.M., et al. 2019. [Effectiveness of lake trout suppression in Lake Pend Oreille, Idaho: 2006–2016](#). Hydrobiologia 840:319–333.
- Ellis, B.K., et al. 2011. [Long-term effects of a trophic cascade in a large lake ecosystem](#). PNAS 108:1070–1075.
- Hansen, M.J., B.S. Hansen, and D.A. Beauchamp. 2016. [Lake trout suppression for bull trout recovery in Flathead Lake, Montana](#). Hydrobiologia 783:317–334.
- Hansen, M.J., M.P. Corsi, and A.M. Dux. 2019. [Long-term suppression of the lake trout population in Lake Pend Oreille, Idaho](#). Hydrobiologia 840:335–349.
- Koel, T.M., et al. 2020. [Yellowstone Lake ecosystem restoration: a case study for invasive fish management](#). Fishes 5(2):18.
- Martinez, P.J., et al. 2009. [Western lake trout woes](#). Fisheries 34:424–442.

- Montana Fish, Wildlife & Parks (MFWP). 2024. Hungry Horse Reservoir and South Fork Flathead River: impacts of the bull trout fishery. Presentation to the Fish and Wildlife Commission, Region 1 Fisheries, Kalispell.
- Montana Fish, Wildlife & Parks (MFWP) and CSKT. 2000. [Flathead Lake and River Fisheries Co-Management Plan 2001–2010](#).
- MFWP et al. 2007. [Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana](#). Helena.
- Muhlfeld, C.C., et al. 2014. [Invasive hybridization in a threatened species is accelerated by climate change](#). *Nature Climate Change* 4:620–624.
- Syslo, J.M., et al. 2011. [Response of non-native lake trout to 15 years of harvest in Yellowstone Lake](#). *Can. J. Fish. Aquat. Sci.* 68:2132–2145.
- Syslo, J.M., C.S. Guy, and B.S. Cox. 2013. [Comparison of harvest scenarios for the cost-effective suppression of lake trout in Swan Lake, Montana](#). *N. Am. J. Fish. Manage.* 33:1079–1090.
- Syslo, J.M., et al. 2021. [Could ecological release buffer suppression efforts for non-native lake trout in Yellowstone Lake?](#) *Can. J. Fish. Aquat. Sci.* 77:1010–1025.
- USFWS. 2015a. [Recovery Plan for the Coterminous United States Population of Bull Trout](#). Portland, Oregon.
- USFWS. 2015b. [Columbia Headwaters Recovery Unit Implementation Plan for Bull Trout](#). Kalispell, Montana.
- USFWS. 2024a. [Species Status Assessment for the Coterminous United States DPS of Bull Trout](#). Version 1.1. Boise, Idaho.
- USFWS. 2024c. [Swan River Valley Bull Trout Recovery Project: Draft Environmental Assessment](#). Kalispell, Montana.