



CONFEDERATED SALISH & KOOTENAI TRIBES

Natural Resources Department

Division of Fish, Wildlife, Recreation and Conservation

October 8, 2026

RE: Public Comment Opposing Wargo Amendment #4 — 2027–2028 Fishing Regulations

The Confederated Salish and Kootenai Tribes (CSKT) respectfully recommend that the Commission reject Wargo Amendment #4 and retain the Department's proposed Flathead Lake regulations. Amendment #4 in particular violates the spirit of Co-Management, confuses volumes of previous scientific work, and reverses 26 years of progress toward recovering native fish while improving balance in the fishery of Flathead Lake.

Salish, Pend d'Oreille and Kootenai people have depended on the fisheries of the Flathead system for generations. Historical accounts describe abundant trout fisheries and extensive traditional fishing practices around Flathead Lake and its tributaries. CSKTs' own historical materials document the importance of Bull Trout and other native fish to tribal communities. This amendment jeopardizes those values by impeding efforts to restore native Bull Trout and Cutthroat Trout populations.

Flathead Lake is one of Montana's most important native-fish conservation systems. The introduction and establishment of Mysis shrimp in the Flathead system fundamentally altered the lake's food web. Kokanee, once the dominant component of the fishery, collapsed, while Lake Trout increased dramatically. Native Bull Trout and Westslope Cutthroat Trout declined substantially, while scientific research identified Lake Trout predation as the most important factor in the decline.

PROCESS

Of particular concern is the manner in which this amendment were brought forward. Meaningful consultation requires disclosure of the actual proposal and sufficient time for the co-manager to evaluate and respond.

We ask the Commission to carefully consider whether Amendment #4 represents a balanced public proposal, or primarily advances the interests of one constituency seeking increased opportunity to catch larger lake trout. The amendment gives substantial attention to the recreational value of trophy lake trout but does not demonstrate that encouraging additional large predators are compatible with the recovery objectives for Bull Trout, Westslope Cutthroat Trout and potentially Kokanee.

We ask the Commission to be cautious about adopting a significant change to a jointly managed fishery through Amendment #4 without first undertaking the comprehensive evaluation that the amendment itself calls for. The amendment asks for measurable objectives, population thresholds, evaluation criteria and decision points. Those are reasonable questions. But they should be answered before the Commission reverses or substantially weakens an established conservation strategy—not after.

Our Lake Trout management program grew out of a co-management framework between CSKT and FWP, not an isolated tribal program imposed on the state. Commissioner Wargo asks FWP to undertake a more transparent evaluation of Flathead Lake's future, including measurable objectives and decision points, while simultaneously asking the Commission to change the regulations now, before that evaluation occurs. The Tribes have carefully conducted the suppression program publicly and adaptively, as we committed to in the Co-Management Plan. In contrast, the amendment proposes to change the management strategy and then study whether the change worked.

Much attention is given in the Amendment to the lack of specificity in the Statewide Fisheries Management Plan. We would like to point out that there is clear specificity in the 2000 Co-Management Plan and the 2014 Implementation Plan regarding Lake Trout and native fish population goals and desired levels of angler participation.

BULL TROUT

Bull Trout are an iconic species, federally protected and exemplified by their migratory life-history in the Flathead drainage, and they are of highest cultural value. The amendment's treatment of Bull Trout is especially concerning. The amendment acknowledges that Bull Trout have remained low but relatively stable, and even concedes that stability may represent an important conservation success. Yet it then uses that same stability to question whether continued suppression is justified. The authors argue that they have a strong commitment to native fish, yet they quickly abandon that commitment by asking "when the management strategy will be reconsidered if bull trout do not show a meaningful response." In a recent FWP evaluation of 63 bull trout populations in Montana by Bell et al., the mean estimate of population growth rate was negative in the majority of populations and only two populations were significantly increasing. In our view, maintaining a stable bull trout population in a system where lake trout are a dominant predator is an important conservation accomplishment. Therefore, the question is not simply whether Bull Trout have increased, but what would have happened to the population without the Lake Trout suppression program, and this, in Flathead Lake, arguably the epicenter of Bull Trout in Montana.

MACK DAYS

Amendment #4 substantially understates the recreational value of Mack Days, a free, tribally run fishing contest, which has become an important part of the Flathead Lake fishing community. The first event was in 2002, and was specifically developed as a way to engage recreational anglers in the Lake Trout management effort. It is a fisheries-management tool designed to reduce nonnative Lake Trout and increase native Bull Trout and Westslope Cutthroat Trout. The program has grown to many hundreds of participants and has contributed to the removal of nearly one million lake trout over its history. It is incorrect to describe Mack Days simply as a restriction on recreational opportunity, instead Mack Days is itself a recreational opportunity. It is a competition that has become part of the culture of Flathead Lake angling and annually attracts hundreds of registrants, while simultaneously helping to accomplish a fisheries-management objective. Amendment #4 would make administration of Mack Days very problematic by reducing the limit on the north end of the lake and decreasing the minimum size for the slot limit. This would make for an uncertain future for Mack Days and would greatly diminish the contribution it makes to achieving goals for the Flathead Lake fishery.

The Amendment emphasizes the declining average size of lake trout and the large number of small fish being caught during Mack Days. In fact, FWP's response provides an alternative biological interpretation: high abundance of small lake trout is exactly why substantial harvest remains necessary. FWP states that the population remains highly productive, that smaller size classes remain abundant, and that removing those smaller fish can improve lake-trout size structure through a release from competition and compensatory growth.

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Gill netting conducted during 2026 by CSKT has targeted small lake trout, with the majority of the catch ranging from 11-19". Netting catch data suggest that lake trout within this size class are highly abundant and consume large quantities of juvenile Yellow Perch and Mysis shrimp, potentially reducing the prey base for large Lake Trout as well as other predatory species within the lake. Maintaining the 100-fish limit across the lake is critical to continue the Mack Days tournament and for providing anglers with the opportunity to meaningfully contribute to the management of these smaller lake trout.

Frequently references to lost recreational opportunity and a lack of specificity in the Amendment are misleading. In fact, in the 2000 Co-Management Plan a commitment was made to maintain angler participation above 50,000 days, meant as a check on balancing angler opportunity with native species recovery. In FWP's latest survey in 2023 the total angler pressure on Flathead Lake was 55,723 angler days, the highest level since 2009.

KOKANEE

Commissioner Wargo acknowledges that previous attempts to restore Kokanee failed because Lake Trout predation was too high. At the same time, the amendment proposes reducing Lake Trout suppression and protecting additional larger Lake Trout. We cannot reconcile those two objectives. If increased Lake Trout predation was one of the factors preventing previous Kokanee restoration, why would we reduce suppression? Commissioner Wargo states that Kokanee are beginning to reappear in Flathead Lake. We consider that an important development requiring a closer look and careful monitoring—not as justification for prematurely reducing the effort likely responsible for their reappearance. We know that Kokanee restoration previously failed because predation by Lake Trout was too high, and now suppression of Lake Trout may be creating a new opportunity for restoration of Kokanee. But inexplicably, Commissioner Wargo proposes we reduce suppression and protect additional Lake Trout ignoring the measures that created the conditions allowing Kokanee to re-establish.

A proposal is made in the Amendment to issue a coldwater fisheries stamp to raise funds for Kokanee supplementation. Unfortunately, this means nothing was learned from an earlier five-year effort to restore Kokanee with hatchery supplementation. That dismal failure laid the groundwork for an ecological solution: reduction of predatory pressure from Lake Trout, which would benefit not only the native trouts and other sport fisheries but may lay the groundwork for reestablishment of Kokanee. We should strive for a better-balanced Lake Trout population before entertaining expensive proposals that ignore the well-researched fact that Kokanee cannot survive in a lake with overly abundant Lake Trout.

SLOT AND HARVEST LIMIT

A 30-36" slot restriction for Lake Trout was in place when the Co-Management Plan was adopted in 2000. The Tribes removed the slot restriction on the Reservation portion of the lake in 2014 because it was an impediment to an already expensive and challenging effort to suppress Lake Trout abundance. After eleven years of increasingly intense suppression, the Tribes reinstituted the slot restriction with some reluctance because it would make our suppression task even more difficult. But we did it because we had seen a reduction in catch rates for larger pre-slot Lake Trout in suppression nets, indicating it was time to ensure we were maintaining angler opportunity by protecting an adequate number of trophy Lake Trout, and also advancing the uniformity of regulations on the lake. Despite these efforts and successful compromises made by each management agency, the amendment disregards that progress and proposes to enlarge the slot restriction, bringing inconsistency back to our regulations.

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Reduction of the minimum size on the slot limit would protect an even larger segment of the spawning population of Lake Trout, increasing abundance and potential competition and depressing growth rates. Trophy potential for Lake Trout in Flathead Lake was highest pre-mysis when the population was low-density, fast-growing, and had abundant high energy in the form of Kokanee, abundant Yellow Perch, Lake Whitefish, and native fish species. Reducing harvest of all size classes of Lake Trout and reducing the minimum size of the slot limit on the north end of the Lake may increase competition for food among Lake Trout, decreasing growth rates and ultimately decreasing trophy potential, as well as capacity to reestablish Kokanee, the two stated goals of Commissioner Wargo. Previous studies have also shown that sexually mature Lake Trout in Flathead Lake over 24" are primarily piscivorous and were the primary size class responsible for Bull Trout predation, contrary to claims in the Amendment #4 rationale.

The Amendment characterizes the reduction of the Lake Trout bag limit to 20 as a liberal harvest limit, implying it would control Lake Trout abundance, despite that being the Standard Western limit which is designed to prevent over-harvest. We know this limit is likely insufficient for population control in Flathead Lake based on population modeling and the fact that the population rapidly expanded during a period when a 15 fish limit was in place.

NON-NATIVE SPORT FISH

We also object to Wargo Amendment #4 which proposes to reverse the Department's proposal for unlimited harvest of three non-native species. Rainbow Trout pose serious hybridization risk to Westslope Cutthroat Trout and because they are an insignificant component of the Flathead Lake fishery, the unlimited regulation has no bearing on angling opportunity. Illegally introduced and invasive Smallmouth Bass and Northern Pike have rapidly increased in abundance since 2015 as evidenced by annual gillnet assessments in Flathead Lake. These species are highly disruptive to both native and sport fisheries, are very difficult to control, and have been widely illegally introduced throughout western Montana, impacting many well-established and popular fisheries. Northern Pike were identified as a major predator of Bull Trout and Westslope Cutthroat Trout in the lower Flathead River in a 2008 study and have increased in abundance since, suggesting they may have a significant impact on migratory Bull Trout and Westslope Cutthroat Trout leaving and entering the lake. Because the Unlimited harvest regulation will likely result in minimal control of their population growth, it will also have no meaningful effect on angler opportunity.

Tribal fisheries staff are available to address any questions the Commission may have on this subject. Ben Rich, Barry Hansen, and Craig Barfoot will attend the Commission meeting by zoom. Thank you for your consideration of these comments.

Whisper Camel-Means, M.S.

Fish, Wildlife, Recreation and Conservation Division Manager
Natural Resources Department
Confederated Salish & Kootenai Tribes



Flathead Reservation Fish and Wildlife Board

The Flathead Reservation Fish and Wildlife Board supports cooperative State–Tribal management of fish and wildlife resources through coordinated review and recommendation of fishing and bird hunting regulations.



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October 7, 2026

Montana Fish and Wildlife Commission

RE: Wargo Amendment #4 – 2027–2028 Fishing Regulations

Dear Commissioners:

During a duly convened meeting of the Flathead Reservation Fish and Wildlife Board on October 6, 2026, the Board reviewed and took action to provide public comment regarding an item before the Montana Fish and Wildlife Commission at its October 14, 2026 meeting: **Wargo Amendments – 2027–2028 Fishing Regulations (posted September 29, 2026), specifically Wargo Amendment #4 with Department Response.**

The Flathead Reservation Fish and Wildlife Board supports continued cooperative management of Flathead Lake based on biological information, native fish conservation, recreational opportunity, and coordinated recommendations from the Confederated Salish and Kootenai Tribes (CSKT) and Montana Fish, Wildlife and Parks (MT FWP) Fisheries professionals. The Board has concerns with Amendment #4 because it would create a new regulatory inconsistency immediately after CSKT changed its regulations to achieve lake-wide consistency and because the proposed change has not been developed through the established co-management process.

The Board recommends that Amendment #4 not be adopted at this time and that any substantial change in lake trout management direction first be evaluated collaboratively by CSKT and FWP technical staff through the existing Flathead Lake co-management framework and brought forward with clearly identified biological objectives and anticipated effects on native fish conservation, lake trout suppression, recreational angling, and enforcement.

The Board also noted concern with the limited amount of time available for review and comment on this amendment. Amendment #4 was posted on September 29, 2026, and was subsequently identified by fisheries technical staff and brought to the Board's attention at its October 6 meeting. This provided a very short timeframe for the Board, fisheries professionals, affected anglers, and the public to evaluate the proposed change and its potential implications for the management of Flathead Lake before the close of the public comment period.

Given the significance of Flathead Lake as a jointly managed fishery, the Board believes substantial changes in management direction should allow adequate time for technical review, coordination between the co-managers, and meaningful public participation.

Thank you for considering the comments of the Flathead Reservation Fish and Wildlife Board.