

*Anaconda Sportsmen Association
201 Cherry St.
Anaconda, MT 59711*

*George Grant Trout Unlimited
PO Box 563
Butte, MT 59703*

*Skyline Sportsmen Association
115 Grand View Dr.
Butte, MT 59701*

October 26, 2021

Fish and Wildlife Commission
Attn: Commission Chair Leslie Robinson
1420 East Sixth Avenue
P.O. Box 200701
Helena, Mt 59620-0701

Dear Chair Robinson:

We are writing to you on behalf of the Anaconda Sportsmen's Association; and the George Grant Chapter of Trout Unlimited and Skyline Sportsmen's Association in Butte. Collectively we represent over 2,000 members and supporters throughout southwest Montana that recreate on the Madison River.

Recently, we became aware that the Madison River Work Group had met multiple times with minimal public notice. Our groups were not aware that any meetings of the Madison Work Group had occurred, until word leaked that not only had meetings occurred, that there were substantive Work Group recommendations going before the Fish and Wildlife Commission on October 28, 2021 to repeal central elements of the Madison River Recreation Plan.

Upon learning of the recommendations, members of our organizations contacted FWP headquarters to complain about the lack of public notice. What we learned was that despite all three of our organizations being active in the Madison River recreation process in 2019 and 2020; and having petitioned the Fish and Wildlife Commission on two separate occasions to adopt recreation rules on the Madison River, FWP did not consider our organizations interested parties, and provided our organizations no notice of the pending Work Group meetings. We were further notified that the only public notice of the last Work Group meeting was contained in a FWP press release covering multiple issues and issued only one day prior to the Work Group meeting. It appears that FWP is doing the bare minimum to keep the public informed of these critical government meetings and is trying to minimize public involvement in the Madison River recreation planning process.

According to the Madison River cover sheet for the October 28, 2021 Fish and Wildlife Commission meeting, the Commission will consider the Madison Work Groups recommendations to "repeal administrative rules 12.77.6702 and 12.77.6706" which would effectively repeal the walk-wade and rest rotation sections on the Madison River.

The work group's stated rationale for their recommendation is ".....lack of support for either rule." On the contrary, we can assure you that there is overwhelming public support for both the walk/wade and rest rotation sections on the Madison River. All three of our organizations support these rules and we advocated for these specific elements during the prolonged 2020 rulemaking process. These elements were contained in our two petitions to the Fish and Wildlife Commission. Furthermore, FWP conducted the most exhaustive surveying, public scoping and public comment process in our organizations' experience to evaluate public opinion on the Madison River recreation planning process. The 2019-2020 Madison River survey conducted by FWP had the second highest participation rate of any survey in FWP history (7,577 respondents, see attached). The consistent conclusion of the Madison River surveys and public comment processes was that both the walk-wade and rest rotation sections enjoyed overwhelming public support and were the highest rated alternatives on all survey and comment

processes. The Work Group's claim that the walk-wade and rest rotation rules lack public support is simply false. If the Work Group does not understand the strong public support for the walk-wade and rest rotation sections on the Madison River, then the membership of the Work Group is not representative of the thousands of public commentors that participated in the last exhaustive Madison River rule making process and related surveys.

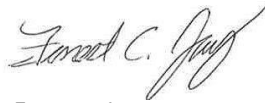
We urge the members of the Fish and Wildlife Commission to revisit the results of the 2020 Madison River surveys and public comment processes, and you will see first-hand the overwhelming public support for the walk-wade and rest rotation rules on the Madison River. We urge the Commission to reject the Work Group's recommendation to repeal administrative rules 12.77.6702 and 12.77.6706. Accepting the Work Group's recommendations to repeal these rules would run contrary to the overwhelming public support for the walk-wade and rest rotation rules on the Madison River.

We request that this letter be included in the comment record for the October 28, 2021 commission meeting.

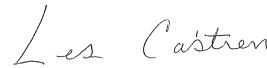
Sincerely,



Gary Ouldhouse
President
Anaconda Sportsmen



Forrest Jay
President
George Grant Chapter
Trout Unlimited



Les Castren
Co-Chairman
Skyline Sportsmen's Association

Enclosures

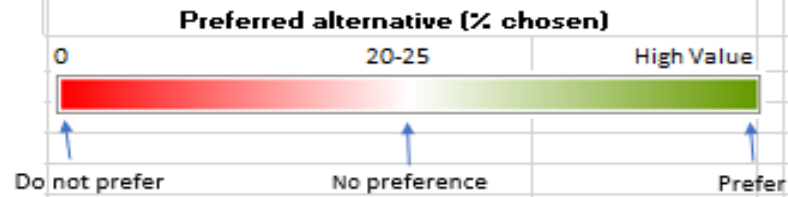
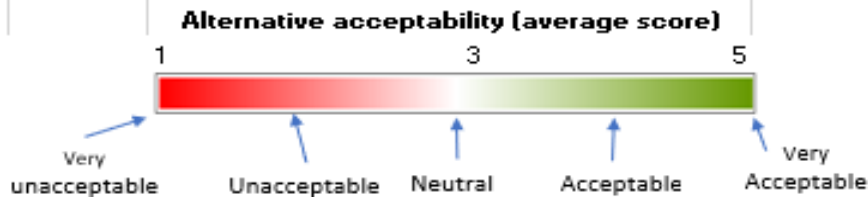
Cc: FWP Director Hank Warsech
Governor Greg Gianforte

MADISON RIVER RECREATION SCOPING SURVEY RESULTS

ALL RESPONDENTS (N=7,577)		Alternative Acceptability (average score)	Preferred Alternatives (percent)
Proposed Management Goal	Healthy Fishery	4.45	
	Economic Viability	3.5	
	Diversity of angling experiences	3.75	
Commercial Fishing Outfitter Management	No Limits	1.81	3.6
	Cap # of outfitters at 2018 level	2.31	6.7
	Cap # of trips of outfitters at 2018 level	3.12	26.7
	Reduce number of trips below 2018	3.53	57
Social Conflict Management on Upper River	No restrictions	1.97	8.9
	Access Site social conflict mgt	2.61	11.5
	Rest-rotation	3.28	28.6
	Walk-wade	3.19	33.6
	Daily boat launch restrictions	2.88	17.4
Lower River Recreational Use Management	Status Quo	2.37	13.5
	Evaluate level of crowding and conflict	3.38	25
	Prohibit commercial use below Greycliff	3.03	22.8
	Preserve primitive nature below Greycliff	3.55	35.1
Angler Use Management on Upper River	No Limits	2.13	13.4
	Non-commercial use cap at 2018 level	2.52	18.9
	50:50 resident:non-resident cap	3.02	38.8
	Citizen's Day	2.74	23

83% support capping commercial trips at or below 2018 levels

Highest Rated Alternatives



**COMPARISON OF RESPONDENTS
BASED ON WHETHER OR NOT THEY
HAD STOPPED FISHING THE MADISON
RIVER IN THE PAST FIVE YEARS**

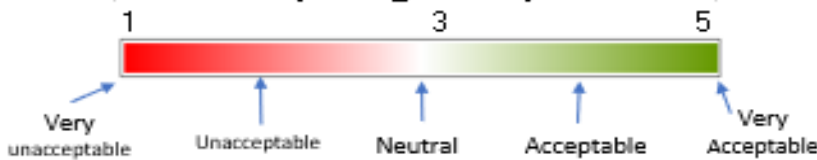
		Alternative Acceptability (average score)		Preferred Alternatives (percent)	
		Have Stopped fishing	Have NOT stopped fishing	Have Stopped fishing	Have NOT stopped fishing
Proposed Management Goal	Healthy Fishery	4.49	4.5		
	Economic Viability	3.15	3.92		
	Diversity of angling experiences	3.78	3.76		
Commercial Fishing Outfitter Management	No Limits	1.39	2.16	2.2	16.1
	Cap # of outfitters at 2018 level	2.2	2.34	3.7	8.7
	Cap # of trips of outfitters at 2018 level	3.1	3.13	20.3	31.9
	Reduce number of trips below 2018	4	3.13	73.7	43.3
Social Conflict Management on Upper River	No restrictions	1.56	2.37	2.7	15.2
	Access Site social conflict mgt	2.32	2.86	5.1	18
	Rest-rotation	3.7	2.88	37.1	21.5
	Walk-wade	3.48	2.87	37.1	29.2
	Daily boat launch restrictions	3.06	2.67	18	16.2
Lower River Recreational Use Management	Status Quo	1.96	2.77	6.3	20.8
	Evaluate level of crowding and conflict	3.28	3.49	21.5	29.9
	Prohibit commercial use below Greycliff	3.41	2.58	30.1	14.9
	Preserve primitive nature below Greycliff	3.77	3.29	41.5	34.5
Angler Use Management on Upper River	No Limits	1.72	2.56	7.5	31.9
	Non-commercial use cap at 2018 level	2.53	2.47	12.9	25.1
	50:50 resident:non-resident cap	3.45	2.53	49.4	26.3
	Citizen's Day	3.18	2.3	30.2	16.6

94%

75%

Highest rated alternatives.

Alternative acceptability (average score)



Preferred alternative (% chosen)

