



January 22, 2024

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

Montana Fish and Wildlife Commission
P.O. Box 200701
Helena, Montana 59620-0701

Re: In the matter of Swan Lake Management, Lake Trout Removal

Submitted via email to fwcomm@mt.gov

To Whom It May Concern:

Thank you for the opportunity to provide written comments on the proposed management actions at Swan Lake regarding the removal of lake trout. We have reviewed the proposal and worked closely with the staff in the Fisheries Division of Montana Fish, Wildlife, and Parks (Department) through the years on this project and bull trout conservation within the Swan River system. As such, we wish to go on record supporting proposed Alternative A that authorizes the Department to implement management actions to remove lake trout to benefit bull trout in the drainage. We look forward to attending the Fish and Wildlife Commission (Commission) meeting to share these thoughts as well.

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 Flathead Valley Chapter of Trout Unlimited (FVTU), and represents approximately 5,000 members and friends. Our members are conservation-minded anglers who have an active interest in native fish conservation and the health and recreational values of our state's rivers and streams.

Further, MTU staff and many members have also dedicated substantial time and funding to the planning and implementation of the previous nearly decade long endeavor of lake trout suppression and research at Swan Lake to benefit bull trout. The current proposal in front of the Commission is a much-needed return to and improvement on that investment, based on lessons learned from previous suppression efforts and the accelerated decline in bull trout since suppression has paused.

MTU and our chapters appreciate the intention and implementation of the 2023-2026 Statewide Fisheries Management Plan (Plan). We actively engaged in the development and drafting of the Plan and its comprehensive and forward-looking approach in each of the identified forty watershed basins.

Our commitment to getting that Plan right was predicated on the notion that it would act as a guide for the management actions within each basin over the course of the next four years, supplemented by emerging data and understanding. In the case of the Swan River Drainage (2.03), the identified and agreed upon focus of management is for native fish conservation efforts, including bull trout and westslope cutthroat. Managing non-native and predatory populations of invasive lake trout through targeted and scientifically informed removal efforts is specifically mentioned in the Special Management Issues section of the plan, and in the “Fisheries Management Direction” for the drainage, lake trout in Swan Lake are to be managed for suppression by “...evaluat[ing] tools to effectively reduce numbers to benefit native fish ...” The proposal in front of the Commission is directly in line with the management objectives outlined in the Plan, and as such the Commission should adopt Alternative A to carry forward implementation of those objectives.

The Plan is further instructive in its discussion of the declining state of bull trout populations within the Swan River drainage that supports the need for intervention. Indeed, the Department’s fisheries surveys indicate that the situation continues to deteriorate with a new low for redd counts in 2023 of 135, down from an estimate of more than 5,000 before lake trout were illegally introduced to Swan Lake, and barely half the 244 redds that were counted in 2020 after the previous suppression efforts paused. While the Swan River population served as an important stronghold in the 1998 listing decision within the region because of its resilience and robust numbers, it is now becoming a liability for potential future listing decisions. The Plan directly identifies growing lake trout populations in Swan Lake as a contributing factor to the decline in bull trout populations.

Finally, we have been waiting too long for leadership from the United State Fish and Wildlife Service (Service) on this issue. Despite promises from the Service that they would quickly lead efforts through the Swan Valley Bull Trout Working Group (SVBTWG), of which we are members, to proactively reduce populations of lake trout in Swan Lake, those efforts have been bogged down in the federal bureaucracy. As such, we believe now is the right time for the Department to take the lead. The only thing we have to lose is more bull trout waiting for action from the Service. We know the Department has the tools to effectively manage a removal effort because of their past actions, and the continued monitoring efforts planned for 2024 will further refine and inform this proposed action.

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



Clayton Elliott
Conservation Director