



**2020 Fishing Regulations  
Email Comments, Letters, and Written Open House Comments**

FWP collected public comments on tentative fishing regulation proposals from August 19 to September 15. The department also hosted 12 open houses, with at least one open house in each region (Table 1). Besides comments collected through an online survey (see separate document with survey comments), 41 emails or letters were submitted and 4 written comments were provided at open houses. All emails, letters, and written comments that were received can be found below.

Table 1. Open houses held during the comment period for the proposed fishing regulations.

Date	City	Location	Time
20-Aug	Great Falls	FWP Regional Office, 4600 Giant Springs Rd	7:00 PM
	Thompson Falls	FWP Office, 5427 Highway 200	4:00 - 7:00 PM
21-Aug	Glasgow	Busted Knuckle Brewery, N Room, 303 1st Ave S	6:30 - 8:30 PM
	Kalispell	FWP Regional Office, 490 N Meridian Rd	6:30 - 8:30 PM
22-Aug	Havre	Best Western Plus, 1425 Highway 2 NW	6:30 - 8:30 PM
	Libby	City Hall Ponderosa Room, 952 E Spruce	4:00 - 6:00 PM
	Lewistown	Lewistown Public Library, 701 W Main St	7:00 PM
26-Aug	Bozeman	FWP Regional Office, 1400 S 19th Ave	6:00 PM
27-Aug	Glendive	Dawson Community College, Ulman Center Room 102	7:00 PM
28-Aug	Billings	Big Horn Resort and Hotel, 1801 Majestic Ln	6:30 PM
29-Aug	Missoula	DoubleTree Inn, 100 Madison St	6:00 PM
	Butte	Comfort Inn, 2777 Harrison Ave	6:00 PM

# Western Montana Bass Anglers

Members of:

Montana BASS Nation (BN)

The Montana Bass Federation (TBF)

Eric,

I sent this packet to each of our 5 commissioners last week. It contains a comment by Gene Gilliland, National Conservation Director for B.A.S.S. This also contains info from the Yellow Bay Bio-Center which lists species of fish and when and where they were either planted or sighted. The letter I sent you and Eileen is also included.

I hope you will seriously take our recommendations under consideration when you finalize the management plan.

Thank you,

Don Collins

Montana Conservation Director for:

BASS Nation and TBF

406-261-3924

# Western Montana Bass Anglers

Members of:

Montana BASS Nation (BN)

The Montana Bass Federation (TBF)

Dear Commissioners,

I am sending you each an informational packet. This is being done out of concern for the bass fishery. We have worked for several decades to develop the self-sustaining trophy fishery into what it is today.

I hope that you will read the information provided and considering either tabling the changes the FWP is recommending and leaving the current regulations as they are or consider my proposal.

Information provided is a comment from Gene Gilliland, National Conservation Director for BASS Nation as well as information on Flathead Lake which gives you a bit of a time line of when non-native species were either introduced or sighted by the Flathead Lake Bio Station/University of Montana.

If you have any questions you are welcome to contact me.

Thank you for your consideration,

Don Collins

Conservation Director

Montana BASS Nation

Montana Bass Federation (TBF)

406-261-3924

don@montanaemuranch.com

# Western Montana Bass Anglers

Members of:

Montana BASS Nation (BN)

The Montana Bass Federation (TBF)

Dear Eric and Eileen,

As Conservation Director of both Montana BASS Nation and The Montana Bass Federation I would like to voice my concerns in regard to the FWP proposed regulation changes for Large Mouth and Small Mouth Bass, of which are currently up for public review on the FWP web site.

We (Western Montana Bassmasters and BASS Nation and TBF) have worked alongside the FWP and Jim Vashro for many years, in fact decades, to provide information and assistance whenever possible. Together we have accomplished a lot to promote and develop a very high-quality Trophy Bass fishery. Regions 1 and 2 are unique to the state due to the many lakes, especially in region 1, that are conducive to providing Montanan's with a multi-specie warm-water fishery alongside the traditional cold-water fisheries.

As good as these fisheries are, they are still very vulnerable and may be easily damaged due to over harvest of trophy fish. We understand your position in regard to illegal plants of warm water species of several types including Crappie, Northern Pike, Walleye, and Small Mouth Bass. We as an organization discourage this and in fact have committed to participate with the other angler organizations to stop these illegal introductions by committing money (\$5000 from BN and \$1000 from TBF) to be offered as a reward for information leading to the arrest of the individual(s) responsible for these illegal introductions.

With the current proposal, which includes the lifting of the spawning closure along with raising the catch and possession limits on SM, could be devastating to both species (SM and LM). Our fear is that without adequate enforcement on the waters at all times that many public anglers would end up harvesting LM right along with SM Bass while they are most vulnerable, during the spawn. We fear the trophy fish would end up being removed and we would still have a bass fishery with both specie but the average size fish would be reduced. There is also a great possibility that we could have an explosion of a smaller SM bass populations without the larger trophy fish to prey on the smaller bass and keep populations in check.

We keep hearing from FWP of how devastating SM Bass are to other game fish species including Large Mouth and even crawfish populations. Actually, with decades of data that has been gathered from tournaments held on Noxon Reservoir you would think that SM would begin to dominate over LM populations. Data from bass tournaments does not indicate that to be true. The ratio of LM seems to hang in at 60% and SM at around 40% in tournaments. It seems that if the SM were so dominate that we would see a change in these ratios or possibly a reversal. Also craw fish population seem to remain healthy in lakes including Noxon where SM Bass are very well established.

Although we believe the reduced limit on LM Bass would benefit many lakes where SM Bass do not exist the risk of eliminating the spawning closure for one specie (SM) and not the other (LM) would create confusion with the angling public and would be a nightmare for enforcement. If there was an expanded enforcement both on the water and at the boat ramps to both educate anglers and enforce regulations your proposal might work however, we could still end up with a fishery loaded with small fish and many of the trophy fish would be gone.

We are also opposed to the lifting of regulations for both specie in Seeley Lake. This is a legally established Large Mouth Bass fishery and deserves protection. If people can tell brown bass (SM) from green bass (LM) in one part of the state they can certainly tell the difference between them in another part of the state. These are much easier to identify than a Bull Trout vs Lake Trout or Rainbow vs Cutthroat.

As I said, it is unfortunate that someone chose to be a biologist and spread different warm water species from lake to lake, but now they are here. You can possibly slow or retard their populations but they are here to stay forever, so why not learn to live with this fact and manage them as the sought after, high quality sport fishery they provide. Yes, we expect you (FWP) to continue to promote and manage the cold-water fishery however it can and does co-exist with the warm water fishery.

Another lake we would like to see taken under consideration as a LM/SM fishery is Flathead Lake. We were informed by our local FWP fisheries manager (Mike Hensler) that there was a SM introduction into Flathead Lake as early as 1942. This was stated at a local bass club meeting as well as a local Walleyes Unlimited meeting. The Flathead Lake Bio Station reports sightings of SM Bass in the 1960's along with legal plants of LM Bass beginning in 1898. Flathead Lake is developing into quite a trophy fishery as FWP did recognize a new MT State Record Small Mouth Bass caught in Flathead Lake a couple years ago. We would like to see a continuation of the same regulations as are set in Noxon and Cabinet Gorge Reservoirs right on up through Flathead Lake.

We would love to get together and hash out our differences on regulations on a lake by lake and regulation by regulation basis. Our goal is for Regions 1 and 2 to be protected and remain the high-quality Trophy Bass Fisheries they are currently.

Sincerely,

Don Collins  
Conservation Director:  
MTBN and MTTBF  
406-261-3924

# Lake Facts

## Flathead Lake Facts

### On this page:

- [Flathead Lake Facts](#)
- [Lake Statistics](#)
- [Flathead Fish](#)
  
- [F.L. Bathymetric Map](#)
- [Lake Levels](#)
- 
  
- The Flathead Lake Biological Station (FLBS) is a year-round University of Montana Center of Excellence that conducts ecological research with an emphasis on fresh water, particularly Flathead Lake and the Flathead watershed. FLBS also provides field ecology courses for college students, natural resource professionals and educators from around the nation; trains graduate students for professional and teaching careers; and provides scientific data, interpretation and outreach to help resolve environmental problems and inform public policy.
- FLBS is one of the oldest active biological stations in the US. It was established in 1899 by Dr. Morton Elrod, the first Biology Professor at the University of Montana. Dr. Elrod was instrumental in the creation of the National Bison Range and Glacier National Park for which he was the first naturalist and wrote its first guide book. FLBS was originally located in Bigfork, but was moved to Yellow Bay in the 1908.
- Flathead Lake is the 79th largest of the natural freshwater lakes in the world, and it is one of the cleanest.
- Flathead Lake's high water quality results from its watershed being mainly National Park, Wilderness and managed forest lands (>60%); having a relatively low human population (~95,000); being dominated by very old, low nutrient geology; receiving high amounts of precipitation (mostly as mountain snow); and rapid flushing of the Lake (about 2.2 years for all the water to be replaced). In contrast, Lake Tahoe's flushing time is about 650 years.
- FLBS serves as the "Sentinel of the Lake", having collected samples and data on Flathead Lake ecology and water quality for over 100 years, and provides insights into ecological conditions and changes over time. Since 1977, FLBS researchers have conducted a rigorous scientific monitoring program, which has shown declining water quality (e.g., increases in algal growth and algal blooms, declines in oxygen in bottom waters). These changes appear to be due to increases in nutrient pollution from human sources, shoreline erosion, changing climate and introduced species (particularly Mysis shrimp); and would have gone unnoticed if FLBS researchers were not conducting long-term monitoring. Currently, FLBS researchers are developing biological and physical models to better understand the influence of increasing nutrients and temperatures plus highly complex community interactions on Flathead Lake's water quality.

- Decreases in water quality have led Federal and State agencies to classify Flathead Lake as "Impaired" due to human caused increases in nutrient and sediments, and to work on creating a long-term plan for water quality protection.
- Flathead Lake is currently described as oligotrophic which means lacking in plant nutrients, but FLBS monitoring indicates that nutrient inputs are increasing.
- Flathead Lake is the largest natural freshwater lake in the western US (by surface area) outside of Alaska. Lake Tahoe has more water than Flathead because it is significantly deeper (nearly 1650 ft vs. 380 ft). The Great Salt Lake in Utah is significantly larger than Flathead but is salt, not fresh water. And there are numerous larger man-made reservoirs.
- Average surface temperatures of the Lake range from 2.3°C (36°F) in mid-January to 13.5°C (56°F) in mid-June to 20.3°C (68°F) in mid-August.
- Flathead Lake's biological community is much different today than when FLBS was founded. The Lake originally had 11 native fish species, notably westslope cutthroat trout (Montana State fish) and bull trout (top predator). However, since the late 1800s, fisheries managers have introduced 19 nonnative fishes to "enhance" the Lake and its angling opportunities. These fish introductions, along with the arrival of the nonnative Mysis (opossum) shrimp in the mid-1980s, changed the biological community dramatically. Today, the fish community is more similar to the Great Lakes than Rocky Mountain lakes, as it is dominated by nonnatives, particularly lake trout, lake whitefish and yellow perch.
- Flathead Lake is a remnant of Glacial Lake Missoula, which covered much of Western Montana until roughly 15,000 years ago. Periodic rupturing of the ice dam that created the lake resulted in cataclysmic floods that swept across Washington and Oregon, removing and transporting huge amounts of sediments, creating the scablands of Eastern Washington, and carving out the Columbia River Gorge.
- The Lake's major tributaries are the Flathead and Swan Rivers. There are numerous small streams that flow into the Lake, particularly on the wetter East Shore.
- Maximum river flow in the Flathead generally occurs between May 15 and June 15 during peak snowmelt, creating a sediment plume that can cover the entire lake surface.
- The Lake level and its outflow are regulated by Kerr Dam, which is located on the Lower Flathead River near Polson. Kerr Dam was completed in 1938 by the Montana Power Company, raised the Lake level 10 feet above its natural level, and generates 194 megawatts of electricity. It is cooperatively operated by PPL Montana and the Confederated Salish and Kootenai Tribes. Regulation by the dam results in the Lake level fluctuating seasonally 10 feet between 2,883 and 2,893 feet above sea level. If snowpack conditions in the mountains do not threaten flooding, lake level is brought to 2,890 feet by the end of May and to full pool by June 15 for summer recreation.
- Due to its large volume and fetch (distance of water across which wind blows), Flathead Lake requires very cold and calm conditions to freeze entirely. Therefore, most winters it does not freeze over, although some bays and margins have ice cover. FLBS historic observations show that the Lake froze over about once each decade, however the Lake has not entirely frozen since 1988-89 (March only) and 1989-90 (January only), perhaps reflecting warmer climatic conditions.
- Public lands around the Lake include a National Wildlife Refuge on the North Shore, six State Parks (including Yellow Bay which is on FLBS property) managed by Montana

Fish Wildlife and Parks (FWP), and nine Fishing Accesses managed by FWP or the Confederated Salish and Kootenai Tribes.

- Wildhorse Island, one of the State Parks, is the largest island in the lake at 2,100 acres, and rises 1,200 feet above the Lake. It is noted for herds of wild horses and Rocky Mountain Bighorn sheep. Native grasses and flowers are abundant.
- The first wagon trail (1880s) from Polson to Somers followed the West Shore of the Lake and was steep and hazardous. In places, wagons were lowered by ropes.
- In 1911, work started from the south end of the Lake to build an East Shore road. The road, which was primarily built by convict labor, was not completed until 1946. Until then, FLBS students and researchers arrived by horse or steamboat.
- Economists estimate that Flathead Lake boosts shoreline property values by \$6-\$8 billion, nature based tourism (which depends upon a healthy Flathead Lake-River System) accounts for roughly 20% of the \$7.8 billion annual economy of Flathead and Lake Counties, and ecological services (e.g., water supply and purification, flood and drought mitigation) contribute another \$20+ billion in benefits to human society.

## Statistics

<b>Maximum Length</b>	27.3 miles (43.9 km)
<b>Maximum Width</b>	15.5 miles (24.9 km)
<b>Maximum Depth</b>	370.7 feet (113 m)
<b>Mean Depth</b>	164.7 feet (50.2 m)
<b>Area Covered by Lake</b>	191.5 sq miles (495.9 sq km)
<b>Area Covered by Islands</b>	5.5 sq miles (14.2 sq km)
<b>Volume of Water</b>	5.56 cu miles (23.2 cu km)
<b>Length of Shoreline</b>	
<b>Mainland</b>	161.4 miles (259.7 km)
<b>Island</b>	26.2 miles (42.2 km)
<b>Total</b>	187.6 miles (301.9 km)
<b>Curvature of Lake Surface</b>	
<b>Length</b>	13.2 feet (4.02 m)
<b>Breadth</b>	5.2 feet (1.58 m)
<b>Flushing Time</b>	2.2 years

## Fish of the Flathead Basin

### Native



<b>Species, Common Name</b>	<b>Habitats<sup>1</sup></b>	<b>Current Status<sup>2,3</sup></b>
Bull trout, <i>Salvelinus confluentus</i>	All	C,D, L
Westslope cutthroat trout, <i>Oncorhynchus clarkii lewisi</i>	All	C,D
Mountain whitefish, <i>Prosopium williamsoni</i>	All	C,?
Pygmy whitefish, <i>Prosopium coulterii</i>	FL,L,A	R,?
Largescale sucker, <i>Catostomus macrocheilus</i>	FL,L,R	C,S
Longnose sucker, <i>Catostomus catostomus</i>	FL,L,R	C,S
Northern pikeminnow, <i>Ptychocheilus oregonensis</i>	FL,L,R	C,S
Peamouth chub, <i>Mylocheilus caurinus</i>	FL,L,R	C,S
Redside shiner, <i>Richardsonius balteatus</i>	FL,L,R	C,S
Slimy sculpin, <i>Cottus cognatus</i>	FL,L,R	C,S
Longnose dace, <i>Rhinichthys cataractae</i>	FLR	C,S

#### **Nonnative (year introduced)**

<b>Species, Common Name</b>	<b>Habitats<sup>1</sup></b>	<b>Current Status<sup>2,3</sup></b>
Lake whitefish (1890), <i>Coregonus clupeaformis</i>	All	A,E
Lake trout (1905), <i>Salvelinus namaycush</i>	All	A,E
Rainbow trout (1914), <i>Oncorhynchus mykiss</i>	FL,L,R	A,E
Brook trout (1913), <i>Salvelinus fontinalis</i>	FL,L,R	A,E
Yellowstone cutthroat trout (1910s), <i>Oncorhynchus clarkii bouvieri</i>	L,R,A	R4,S
Golden trout (1960s), <i>Oncorhynchus mykiss aquabonita</i>	L	R4,S
Brown trout (1910s), <i>Salmo trutta</i>	R,FLR	R,?
Kokanee salmon (1916), <i>Oncorhynchus nerka</i>	A	R,D
Arctic grayling (1960s), <i>Thymallus arcticus</i>	L,R,A	R4,S
Yellow perch (1910), <i>Perca flavescens</i>	FL,L	A,S
Northern pike (1960s), <i>Esox lucius</i>	FL,L,R	C,E
Largemouth bass (1898), <i>Micropterus salmoides</i>	FL,L	R,E
Smallmouth bass (1960s), <i>Micropterus dolomieu</i>	FL,L,FLR	C,E
Pumpkinseed sunfish (1910), <i>Lepomis gibbosus</i>	FL,L	C,S
Black bullhead (1910), <i>Ameiurus melas</i>	FL,L	C,S
Central mudminnow (1990s), <i>Umbra limi</i>	L	R,?
Brook stickleback (??), <i>Culaea inconstans</i>	FL,L,R	R,?

Walleye (??), <i>Sander vitreus</i>	L	R4,?
White sucker (??), <i>Catostomus commersonii</i>	L	R4,?
Black crappie (??), <i>Pomoxis nigromaculatus</i>	L	R4,?

<sup>1</sup> **Habitats:** Populations found in: Flathead Lake (FL), other Basin lakes (L), rivers and streams (R), with adfluvial (A) life cycle (adults in lakes, spawn in tributary streams); the Lower Flathead River (FLR) downstream of Kerr Dam.

<sup>2</sup> **Distribution:** Abundant throughout Basin (A), common in many areas (C) or restricted (R);

<sup>3</sup> **Trend:** Population size stable (S), declining (D), expanding (E), or unknown (?). Listed (L) under the Federal Endangered Species Act.

<sup>4</sup> Introduced to a few small lakes in the Basin.

Compiled by FLBS and adapted from: B.K. Ellis, J.A. Stanford et al. 2011; Stanford, J.A. and B.K. Ellis 2002; Holton and Johnson 1996; Montana Fisheries Information System; unpublished records; and professional opinion.

## Flathead Lake Bathymetric Map



## Lake Levels

Flathead Lake level information is now available on the [FLBS weather and meteorological data page](#).

- [\*Social Link\*](#)
- [\*Social Link\*](#)
- [\*Social Link\*](#)

- [Social Link](#)
- [Social Link](#)



## Find Us

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Polson, MT 59860-6815  
47.87674, -114.03308

- [flbs@flbs.umt.edu](mailto:flbs@flbs.umt.edu)
- 406.872.4500

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**Don**

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**From:** Gene Gilliland <ggilliland@bassmaster.com>  
**Sent:** Wednesday, September 11, 2019 6:26 PM  
**To:** Don; Curtis Spindler  
**Subject:** Draft Comments on Smallmouth Bass Regulation Proposal - Please review and let me know if this hits on the issues and I will submit to FWP.

## **Fish, Wildlife and Parks Fishing Regulation Proposals, 2020-2024**

### **Standard Regulations (Daily Limits) (put an X on your choice)**

\_\_\_\_ Current: 5 bass, only 1>12". 3<sup>rd</sup> Saturday in May – June 30: 1, 22" minimum

\_\_\_\_ Proposed: Largemouth Bass: 5 bass, only 1>12". 3<sup>rd</sup> Saturday in May – June 30: 1, 22" minimum

Smallmouth Bass: 15, no size limit

**Comment:** As a long-time and widely traveled black bass biologist, now National Conservation Director for B.A.S.S., I feel it is my obligation to offer our parent organization's perspective on this regulation proposal. As with the removal of all limits on smallmouth bass on the Columbia River in Oregon and Washington, this proposal is really no more than management by gesture. It appears the agency is being responsive to the "conservation" community, to your constituents that fish for trout, or to those that simply embrace a native-only philosophy - but what it does is send a message that despite our organization's acknowledgment that smallmouth bass have been illegally introduced and they can be a problem in some situations, that these fish and the anglers who fish for them are of lesser value to the agency, the state and the economy.

From a practical standpoint, this increased bag limit for smallmouth bass will have little to no biological impact. The only folks who can actually catch enough of these fish to potentially take advantage of what is in effect a "no limits" management scheme are the hard-core bass anglers --- and they won't kill these fish no matter what the agency says. The catch-and-release ethic is far too ingrained in bass anglers and the number of other anglers who might keep these fish is likely too small to have an impact. To quote one of your own employees,

*Asked why they can't get rid of a species by fishing for them, Travis Horton, FWP's Regional Fisheries Manager for southwestern Montana, in an interview for Montana Public Radio in April 2019 said, "Fishing to the decimation of a fish population — nobody will put the effort in long enough. And when the catch rates really decline, there's still fish out there that will spawn and come back. Not to mention you have to get all sizes of them so the juveniles that aren't able to be caught, are in there and have to grow to a catchable size."*

In the long run, as the climate changes, these fish will be more and more prevalent and will be supporting a greater and greater portion of the total effort, success and financial support for the agency and for conservation. This will eventually lead to big problems with the relationship with the warmwater angling base down the road. The counter-proposal put forth

by the Montana B.A.S.S. Nation seems to be a compromise that the bass fishing community is willing to support. It acknowledges the need for control of illegal introductions by allowing more harvest of smallmouth bass but doesn't jeopardize quality fisheries (for either bass species) in the process:

Largemouth Bass: 5 daily and in possession only 1 greater than 12".

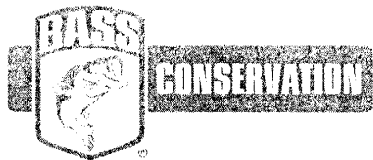
Smallmouth Bass: 5 daily and in possession no size limit.

Combined Limit: 5 SM and 1 LM daily in possession no size limit.

Spawning closure of area lakes to begin on the 3<sup>rd</sup> Monday in May and reopen June 14<sup>th</sup>, leave Noxon and Cabinet Gorge under current rule.

Respectfully,

Gene Gilliland  
B.A.S.S. Conservation Director  
405.317.9488  
[ggilliland@bassmaster.com](mailto:ggilliland@bassmaster.com)



## Robson, Coreen

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**From:** Debra Roth <ladsroth@gmail.com>  
**Sent:** Friday, September 6, 2019 5:09 PM  
**To:** FWP Fish Regs 20  
**Subject:** Bass Regulation

The proposed changes to previous regulations almost seem like they are leaving tournament anglers out to dry. With 15 smallmouth as the limit, that is more than anybody needs for food. As a competitive angler, it is hard to hear that potentially big fish could be removed and not even help someone to win. For the largemouth slot, that size takes out almost all fish weighed in in tournaments, making it very hard to do well in said tournament.

**Robson, Coreen**

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**From:** Debra Roth <ladsroth@gmail.com>  
**Sent:** Monday, August 26, 2019 11:06 AM  
**To:** FWP Fish Regs 20  
**Subject:** Bass Fishing Regulation Changes

To FWP.

Recommended bass regulation changes as approved by Montana Bass (BN) and The Montana Bass Federation (TBF)

**Bass Regulation Recommendation 8/17/19**

by: Montana BASS (BN)  
The Montana Bass Federation (TBF)

**Large Mouth Bass: 5 daily and in possession only 1 greater than 12".**

**Small Mouth Bass: 5 daily and in possession no size limit.**

**Combined Limit: 5 SM and 1 LM daily in possession no size limit.**

**Spawning Closure for both specie – \*Third Monday of May through June 14 for all lakes with the exception of Cabinet Gorge and Noxon Reservoirs which would have spawning closure June 15 – July 14: 1 daily and in possession, must be over 22". (We are in favor of removing this)**

\*This would shorten the spawn closure by 2 weeks on area lakes.

These regulations would be consistent for all waters in region 1 and 2.

No spearing of bass allowed on any waters including Seeley Lake.

(We believe that with these regulation recommendations the public would be much more receptive to these limits. With the increased limit on Small Mouth over Large Mouth, the consuming public would target Small Mouth. This would also protect the spawning fish especially Large Mouth. Our fear in leaving the closure open for Small Mouth is that this would be detrimental to Large Mouth spawning populations as well, and that without proper enforcement could potentially cause confrontations among anglers on the water. Also the removal of trophy fish would cause an explosion of smaller fish of both specie. The fishery will remain with both LM and SM however the quality of the overall bass fishery would decline without leaving the spawning closure intact.)

Also, add Loon Lake (Lincoln County), Echo Lake, Flathead Lake and Lower Flathead River (have legally stocked smallmouth bass), if above regs are not implemented to waterbody exception list.

Thank You

Stephen Roth

Kalispell, Mt



**Robson, Coreen**

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**From:** Debra Roth <ladsroth@gmail.com>  
**Sent:** Friday, September 6, 2019 5:02 PM  
**To:** FWP Fish Regs 20  
**Subject:** Western District Bass Regulation Proposals

i would like to see the possession for smallmouth bass to leave as is

## Robson, Coreen

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**From:** Kevin Accola <Kaccola@aol.com>  
**Sent:** Monday, September 2, 2019 2:35 PM  
**To:** FWP Fishing  
**Subject:** \*\* Email from fwp.mt.gov \*\*

Name: Kevin Accola  
Phone Number: 4078087474  
Email: Kaccola@aol.com

I strongly believe the entire Flathead River should be barbless hooks.

## Robson, Coreen

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**From:** Cristin Mills <Soybean422@yahoo.com>  
**Sent:** Tuesday, September 3, 2019 9:50 AM  
**To:** FWP Fishing  
**Subject:** \*\* Email from fwp.mt.gov \*\*

Name: Cristin Mills  
Phone Number:  
Email: Soybean422@yahoo.com

Please reconsider your stance on single barbless regulation and expand it throughout the entire Flathead river system. Fish don't stay in one spot to avoid treble hook trauma. Not only does this regulation confuse the public its just bad policy. Treble hook fishing causes mass amounts of fish maimed not only in the mouth but the body. Again please reconsider your stance and keep it simple!

## Robson, Coreen

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**From:** Dan Short <dan.short55@gmail.com>  
**Sent:** Sunday, September 15, 2019 11:06 AM  
**To:** Hensler, Mike; FWP Fish Regs 20  
**Cc:** Dan Short  
**Subject:** 2020 Fishing Regulation Proposals

**Daniel D Short**

**164 Juniper Bend Dr**

**Kalispell, MT 59901**

September 15, 2019

Montana Fish and Wildlife Commission

1420 East Sixth Avenue

Helena, MT 59620

Montana FWP Region 1, Fisheries Division

490 N Meridian Rd

Kalispell, MT 59901

-----Delivered via E-Mail-----

Dear Sirs:

Thank you for allowing me to comment on the Proposed 2020 Fishing Regulation Changes. I appreciate the opportunity to have a voice in the regulation setting process.

I am primarily interested in commenting on proposals 7, 9, 10 and 15 concerning restrictions on terminal tackle used on the main stem of the Flathead River above the Teakettle Fishing Access Site and the 3 forks of the Flathead. This fishery is predominately a Westslope Cutthroat Trout fishery with existing catch and release regulations in place. Westslope Cutthroat Trout occupy a fraction of their historical range and face peril from a variety of sources including warmer temperatures and competition for food and predation from non-native species.

Over the last 10 or 15 years of fishing the Flathead system and the specific waters affected by these proposals, I have noticed two things: an increase in anglers on the water and an increase in fish with torn and/or missing mandibles and mouth parts. Some of the damaged fish are so disfigured that I, upon landing and releasing these fish, would not let me wife or grandchildren see the entire fish before I released it. My feeling is that excessive handling, poor release techniques and unnecessarily aggressive terminal tackle cause the damaged mouths I am seeing. The proposed regulation to require *"Single-pointed hooks only. No treble or double hooks."* is a step in the right direction. Since this part of the Flathead system is catch and release for Westslope Cutthroat Trout, a fish caught on a single pointed hook has a higher likelihood of a faster and gentler release than a fish caught on a double or treble hook. The faster and

gentler release should require less handling of the fish leading to less damage to their mouths and, ultimately, higher survival rates. For this reason, I support the proposed regulation.

To go a step further, I would urge Region 1 and the Commission to please consider future regulation changes that would make it even easier to quickly and gently release fish leading to minimal handling time during the release process. Two other possible regulation changes would be to require barbless hooks and restrictions on the use of live bait. Adopting restrictive regulations surrounding these two angling practices would also significantly reduce handling time during the release process and result in a higher survival rates.

I would also like to make brief comments about a few of the other proposed regulations.

Proposals 4 and 17 both contain language concerning catch and release of Westslope Cutthroat Trout. I support any regulations that result in standardization and increased uniformity of regulations, especially concerning catch and release for native Westslope Cutthroat Trout.

Proposal 2 to change the standard regulation of bass in the Western Region. I very much disagree with any regulation that begins to treat an illegally introduced, non-native species such as small mouth bass as a normal game fish. These illegal plantings threaten our native species and setting normal game fish limits on these aggressive species only makes the Department look like it is unwilling to address the issue of illegal introductions. Please seriously consider the comments received during the scoping period that supported unlimited possession of these dangerous invaders.

Thank you again for the opportunity to comment about the proposed fishing regulations. I appreciate the open and transparent process. If you have any questions about my comments, you may contact me at the address above or by email at [dan.short55@gmail.com](mailto:dan.short55@gmail.com) or by phone at 406-250-5064.

Sincerely,

Daniel D Short

## **Robson, Coreen**

---

**From:** jeaolson@cyberport.net  
**Sent:** Friday, September 13, 2019 7:48 AM  
**To:** FWP Fish Regs 20  
**Subject:** 2020 Fishing regulation proposed changes comment

We'd like to submit our strong support for gear restrictions on the main Flathead and tributaries, including the three main forks above Teakettle FAS. Specifically we support the banning of multi-point hooks in those areas. Anyone who has ever tried to release a struggling fish from a treble hook knows that it takes more time and does more damage than releasing a fish from a single point hook. Fishing pressure has increased on the Flathead and its tributaries in recent years. One easy way to reduce stress and mortality on the fish is to allow only single pointed hooks. Another would be to ban the use of bait, as baited hooks are usually taken deeper, and therefore often cause more damage to the fish.

Thank you.

Dan and Jeanne Olson  
160 West Valley Acres  
Kalispell, MT 59901

## Robson, Coreen

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**From:** george widener <sisakomi@hotmail.com>  
**Sent:** Tuesday, September 10, 2019 12:49 PM  
**To:** FWP Fish Regs 20  
**Subject:** 2020 proposed fishing regulations

I commend the FWP for proposing a single point rule for the Flathead. With the rapidly increasing pressure each year the proposal comes none too soon. If the purpose of the rule is to lessen injury and mortality on our native Westslope Cutthroat and Bulltrout then, as several studies have shown, banning bait and barbs would save far more fish. I look forward to when we have a single, barbless, no bait rule for the entire Flathead. Thank you for the opportunity to comment. Sincerely, George Widener

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## Robson, Coreen

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**From:** Cory Cowley <cory7492@yahoo.com>  
**Sent:** Friday, August 30, 2019 4:34 PM  
**To:** FWP Fish Regs 20  
**Subject:** Bass regulations

Hi my name is Cory Cowley

I just would like to voice my opinion about the proposed change to the regulations regarding smallmouth bass.

First a little about me. I grew up here in Columbia Falls. I have been bass fishing since I was 10 years old. I'm 45 now ! I have bass fished in MT , CA , ID and WA. I do a ton of bass fishing. I also grew up fly fishing for trout as well when I didnt have a boat.

I understand smallmouth bass were illegally introduced in a lot of lakes in the area. Neither I nor anyone I know condone those illegal introductions. I just wish there could be some common ground or give and take between FWP and bass anglers. It's my opinion that doing both the 15 smallmouth bass limit and lifting the spawn closure would be devastating to not just smallmouth, but also largemouth in some of these lakes. In my opinion eradicating smallmouth out of Bitterroot and McGregor lakes is understandable. The lake I'm REALLY concerned about is Echo lake near Bigfork. Echo lake has had largemouth forever!! Smallmouth had been illegally introduced there years ago . They are doing good there , but not great !

I have heard from some people that say that the smallmouth are taking over Echo lake. I could not disagree more! I fish Echo a lot ! In fact I was just out there 2 days ago. I did really really good ! I probably caught 30 bass , smallest being around 2 pounds. If all those bass I caught 4 largemouth to 1 smallmouth. That seems to be the normal . 4 to 1 or 5 to 1. The largemouth are also still quite a bit bigger. So please dont listen to people who may say the smallmouth are taking that lake over, they are not. I understand that Noxon reservoir is going to be left alone. No changes to the regs there. I am very happy for that. It is also an incredible bass fishery. Although I think Echo is better. I know there are such a thing as blue ribbon trout streams and trophy lakes. I feel Echo is in that same category.

The problem I have with the proposed reg changes is the spawn closure mostly. If the spawn closure for smallmouth is lifted , it will be devastating to the largemouth as well. The reason being is there are a ton of people that fish these waters that do not know the difference between largemouth and smallmouth bass. They will catch a bass on its bed ( when the bass are most vulnerable) and put it on a stringer or throw it in the bottom of the boat. A big number if those will be largemouth! FWP doesn't have the resources to have game wardens out on lakes making sure people dont keep the large mouth. Just like a lot of people cant tell the difference between a bull trout and a lake trout. I dont feel that the largemouth should be acceptable collateral damage.

I believe Echo lake should not be part of the new proposal, just like Noxon. Both those lakes have a very strong largemouth presence that could be in jeopardy if the new regulations go into effect. The Thompson chain of lakes also is great for largemouth, but there doesnt seem to be a smallmouth issue there.

I feel McGregor and Bitterroot are the real issues.

Thank you for your time !

Sent from Yahoo Mail on Android



**Robson, Coreen**

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**From:** Paul Siddoway <paulsiddoway@gmail.com>  
**Sent:** Tuesday, August 20, 2019 10:22 PM  
**To:** FWP Fish Regs 20  
**Subject:** Big Hole Regulations changes  
**Attachments:** Big Hole Brown Trout Regulation Change Proposal.eml

This is proposal to be considered for 2020 regulations. Thanks , Paul S.

## Robson, Coreen

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**From:** Paul Siddoway <paulsiddoway@gmail.com>  
**Sent:** Wednesday, August 21, 2019 11:28 AM  
**To:** FWP Fish Regs 20  
**Subject:** Big Hole River Regulations

I am writing this comment in response to the decline in Brown Trout Populations in the Jerry Creek and Melrose sections. A significant decline in the Brown Trout numbers occurred in Late 2014 and 2015 related to Fungus Infection. The 2012-2014 data showed 1400-1800 Brown Trout per mile in these sections. Most recent data from Jim Olson(Spring of 2019) show numbers remain down at 400-600per mile. Clearly, the Brown Trout have not recovered from the major die-off related to the Fungus infection. I am surprised that FWP has not utilized this information to make recommendations for possible increased protection of the Brown Trout. The fishing regulation proposal outline clearly states that FWP is committed to implementing certain regulation changes if certain events transpire(e.g. changes in fish populations). It has been 4 years now and no changes to regulations has occurred based on this clear change in the Brown Trout Populations. It seems that a spawning closure from Jerry Creek to Browns Bridge from October 1st-December 1st would make good common biological sense and be a sign of committment towards improving the Brown Trout populations. Please consider this or some other restrictions on this section so the Brown Trout have an improved chance of bouncing back to previous population densities. Best Regards, Paul Siddoway, Butte and Melrose MT.

## Robson, Coreen

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**From:** Jeffrey Laszlo <laszloj86@hotmail.com>  
**Sent:** Thursday, September 12, 2019 8:52 PM  
**To:** FWP Fish Regs 20  
**Subject:** Comment on Madison River and Tributaries

I would like to offer the following comment on The Madison River and its tributaries. I feel strongly there should be a season on the Madison and its tributaries as was the case in the past. This would address many current issues including the concern that ever increasing usage will soon negatively affect the resource and also protect spawning areas in important tributaries. Generally it would give the river, its tributaries and fragile riparian areas a rest and offer protection from over usage and a rapidly growing population.

Sincerely

Jeffrey A Laszlo  
Granger Ranches  
Ennis, MT 59729  
406-579-3434

## Robson, Coreen

---

**From:** Adam Daller <amortdal@bresnan.net>  
**Sent:** Friday, August 16, 2019 7:03 PM  
**To:** FWP Fish Regs 20  
**Subject:** comment

From

Adam Daller

7145 Beryl lane

Missoula Mt 59804

Fishing regulations desperately need to be changed in virtually all areas of the state. Despite constant effort by Fwp, trout unlimited, and countless other non-profits fishing quality continues to decline in virtually every river and creek in this state. Don't ask the short term guides that want to make a buck. Ask those of us that never return to rivers and streams that we used to fish as recently as 3 to 5 years ago. The major decline in fisheries is already well advanced and I would be shocked if anything could be done to fix it without limiting fishing in a major way.

Thanks

Adam

**Robson, Coreen**

---

**From:** lgsultz@charter.net  
**Sent:** Saturday, September 14, 2019 10:13 AM  
**To:** FWP Fish Regs 20  
**Subject:** Comments on 2020 Fishing Regulation Proposal  
**Attachments:** 2020 Proposed Regulation Changes FVTU comments.pdf

Dear Sirs,

Attached please find comments on proposed fishing regulation changes for 2020 from the Flathead Valley Chapter of Trout Unlimited.

Thank you for this opportunity to comment.

LaVerne Sultz  
Conservation Chair  
Flathead Valley Trout Unlimited  
[lgsultz@charter.net](mailto:lgsultz@charter.net)  
406-755-2920



Flathead Valley Chapter Trout Unlimited  
P.O. Box 638  
Kalispell, MT 59903

9/2/2019

Montana Fish and Wildlife Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, MT 59620-0701

Montana FWP Region 1, Fisheries Division  
490 North Meridian Road  
Kalispell, MT 59901

Subject: Proposed 2020 Fishing Regulation Changes

Dear Sirs:

We have watched the slow decline of native fish populations in the Flathead Watershed for several decades. These declines are due to many factors, such as warming waters, competition and predation from introduced species and increased angling pressure along with harmful fishing techniques and equipment. Many components of the population decline are difficult or impossible to address through fishing regulation change, but some changes could benefit our native fish. To protect native fish in these waters, we have made it mandatory to release all westslope cutthroat trout and we ban fishing for native bull trout. Flathead Valley Trout Unlimited supports any effort or regulation change that will give an advantage to the survival of our native fish populations.

Proposals 7, 9, 10, and 15 recommend gear restrictions for the mainstem Flathead and tributaries including the main three forks above Teakettle FAS. Anglers would be restricted to single-pointed hooks, no treble or double-pointed hooks. We know that angling pressure on native fish in these waters has drastically increased in recent years and that increase is forecast to continue. Our members have seen and heard from many local anglers and guides alarming and often fatal mouth damage (ripped mandibles, missing mouth parts) due to hooking-caused wounds, as well as reports of dead fish, likely due to poor playing and releasing techniques, dangerous terminal tackle and increasing angling pressure. Treble hooks play a large part in these wounds. We support efforts to eliminate the use of multi-pointed hooks in the Flathead.

*Specifically, the proposed regulation reads: "Single-pointed hooks only. No treble or double hooks. Anglers may remove treble or double hooks from the lure and replace them with a single hook, or the shanks may be cut off the other hook points leaving a single*



Flathead Valley Chapter Trout Unlimited  
P.O. Box 638  
Kalispell, MT 59903

9/2/2019

*hook. Lures with multiple hook attachments may still be used but any treble hook must be replaced by a single hook."*

The wording of this proposed change has been misinterpreted by local news outlets and some anglers to mean that fishermen would be limited to a single, terminal hook. That is not the intention of the change. We would recommend changing the wording as follows to be more specific and readable.

*Single-pointed hooks only. No treble or double hooks. Anglers ~~may~~ must remove treble or double hooks from ~~the~~ lure and replace them with a single-pointed hook. ~~or~~ Alternately the shanks may be cut off the other hook points leaving a single-pointed hook. Lures with multiple hook attachments may still be used but ~~any~~ double, or treble hooks must be replaced by a single-pointed hooks.*

We believe that removing multi-point hooks from use on populations of threatened native fish will result increased survival and in better overall survival of the population. We support these proposals.

In addition to prohibiting the use of multi-pointed hooks on these threatened native fish populations, Flathead Valley Trout Unlimited would support two further restrictions on terminal tackle that will improve the survival of our prized native fish.

- **NO BAIT:** Nearly all scientific studies have found that fishing with bait drastically increases injury to fish. Baited hooks are nearly always taken deeper and are more likely to impact vital organs, gills or viscera. It is unconscionable to allow the use of a technique known to harm and kill fish to be used on waters that contain threatened native fish already in jeopardy and restricted to catch-and-release. The use of bait on the forks of the Flathead should not be allowed.
- **BARBLESS HOOKS:** The use of barbless hooks has been controversial around our region for some time. Several surrounding states and Canadian provinces have instituted barbless hook regulations on specific populations for various biological and social reasons. Many Flathead anglers already choose to fish barbless for personal reasons. While the use of barbless hooks cannot definitively be proven to drastically reduce mortality, it is well known that it is easier to release a fish from a barbless hook which reduces handling time and air exposure. We support requiring the forks of the Flathead be barbless hooks only.



Flathead Valley Chapter Trout Unlimited  
P.O. Box 638  
Kalispell, MT 59903

9/2/2019

Finally, there is one more proposed regulation change that requires our comment. As part of Proposal 2 to change the standard regulation of bass in the Western Region, the Department would separate regulation of largemouth and smallmouth bass and set a possession limit on smallmouth bass of 15 daily and in possession. FVTU does not feel that treating an illegally introduced, aggressive species as a normal game fish and setting possession limits and seasons is consistent with the intent of the Unauthorized Placement of Fish rule (ARM 12.7.1501).

Whereby, *"The department and commission shall make prevention of and response to unauthorized species a priority."* And, *"the department will endeavor to protect the previously existing fishery and suppress or eradicate the unauthorized species. . ."*

The proposal itself notes that there have been 18 confirmed illegal introductions of smallmouth bass in the past several years in the Western Fishing District and that smallmouth bass can outcompete native fish populations. During the scoping process, 68% of respondents supported no possession limit for illegal smallmouth bass, but the Department decided to include a 15-fish limit which moves us down the road toward making this dangerous invader an accepted part of our fishery and establishing more illegal populations in Western Montana.

We thank you for this opportunity to comment and we appreciate the open public process used by the Department to make these changes.

Sincerely,

*Flathead Valley Chapter of Trout Unlimited*

Board of Directors

[flatheadtu@gmail.org](mailto:flatheadtu@gmail.org)

406-755-2920



## Robson, Coreen

---

**From:** David Taylor <dtaylor@cityofwhitefish.org>  
**Sent:** Monday, August 26, 2019 4:50 PM  
**To:** FWP Fish Regs 20  
**Subject:** Comments on Proposed Fishing Regulation Changes for Flathead River

Fish, Wildlife and Parks:

I whole heartedly support limiting users to single hooks on the Flathead system above Teakettle. Treble hooks kill fish. I do not support a ban on a two-fly setup (ie, hopper/dropper), although you could consider limiting a two-fly dropper setup to barbless hooks only and set a ten inch minimum distance between the flies. A two fly dropper setup has the same impact on a fish as a single fly setup. Lures with treble hooks are far more deadly. Thank you for your consideration.

David

David Taylor, AICP  
*Director of Planning and Building*  
City of Whitefish  
418 East Second Street  
P.O. Box 158  
Whitefish, MT 59937  
406-863-2416



**Robson, Coreen**

---

**From:** Bruce Farling <brucefarling@gmail.com>  
**Sent:** Sunday, September 15, 2019 9:10 PM  
**To:** FWP Fish Regs 20  
**Subject:** comments on proposed fishing regulations for 2020  
**Attachments:** 2020 proposed fishing reg changes -- farling.pdf

Folks,

Please accept the attached comments on the proposed fishing regulation changes for 2020. Thank you.

Bruce Farling  
232 West Sussex Avenue  
Missoula, MT 59620

Bruce Farling  
232 West Sussex Avenue  
Missoula, MT 59801  
[brucefarling@gmail.com](mailto:brucefarling@gmail.com)

13 September 2019

Eric Roberts  
Fishery Management Bureau  
Montana FWP  
1620 East Sixth Avenue  
Helena, MT 59620-0701

Re: comments on proposed 2020 fishing regulation changes

Dear Eric:

Thanks for the opportunity to submit these comments on FWP's proposed changes to Montana's fishing regulations for 2020.

- I support the proposal #4 that calls for catch and release for all cutthroat trout from the mouth of the Thompson River downstream to the Idaho line. This regulation makes cutthroat trout regulations consistent for the full reach of the Clark Fork River, while also protecting significant investments made by Montana FWP, Idaho F and G, Avista, local watershed groups and TU in restoring cutthroat trout in the lower Clark Fork region.
- Proposals #7, 9, 10 and 15 for the main Flathead River and its three forks to institute a single pointed hook regulation for terminal gear deserves adoption, but with this modification: It should also mandate barbless hooks. Though the research is incomplete on the adverse effects of barbless hooks to released fish, there is a reason hook manufacturers still make barbs. They better ensure a fish is hooked. And inversely, it means that it is a bit more difficult to unhook a fish. That additional difficulty in unhooking and releasing can cause direct mortality, or incur harmful damage that causes delayed mortality. Though hooking mortality in released fish with barbed hooks in many fisheries might not result in reduced abundance at the population scale, it is still reasonable to conclude that a small percentage increase in mortality in some fish populations, such as in low-density bull trout populations, can adversely affect recruitment. It would only take a few additional deaths of spawning age fish in some bull trout populations – even though it is illegal to deliberately target them -- to reduce subsequent fish numbers. FWP should institute catch and release, single-barbless hooks in all bull trout fisheries. Enough bull trout are caught annually, deliberately or

not, using large barbed hooks on streamers that it is probable we have unacceptable mortality in some fisheries, including in the Flathead drainage.

- Proposal 34 to establish standard fishing seasons on tributaries of the Smith River between Camp Baker and Eden Bridge deserves adoption. It would be advisable to consider including tributaries outside this reach, given what has been learned with recent fish movement studies. Mainstem fish, as well as fish from the Missouri, are using tributaries upstream and downstream of the Camp Baker-Eden Bridge reach.
- Proposal 2 for the Western Division should not be adopted. Proposing to legitimize smallmouth bass fisheries that were established illegally by instituting daily take and possession limits is bad policy.
- Automatically instituting hoot owl restrictions on the lower Madison from mid-July to mid-August is good policy. However, the reach should be extended upstream to Ennis Dam. The temperature conditions in Beartrap Canyon and down to Warm Springs are often similar to the lower river. This regulation won't affect much angling because the pressure is generally light once temperatures are high and recreational non-fishing floating increases. This regulation should not exclude the possibility of instituting a total closure on the lower river if temperatures reach FWP's closure triggers.
- Proposal 33, which would establish a daily take and possession limit for walleyes in the Missouri River between Holter Dam and Cascade, should NOT be adopted. First, the current regulation of unlimited harvest has been serviceable and it recognizes that conserving the important wild trout fishery in this reach is a state priority. Creating a regulated walleye fishery in this reach is bad policy. The presence of walleye in this reach coincides with the establishment of a highly fecund, illegally introduced walleye population in Canyon Ferry Reservoir. Available evidence indicates most if not all of the walleyes below Holter drifted down from Canyon Ferry. In effect, by legitimizing this fishery FWP would be creating incentive for establishment of illegal fisheries. That is a bigger problem than trying to reduce walleye numbers with regulations that include harvest limits that few if any anglers would take advantage of.

Thanks again for this opportunity to comment.

Sincerely,



Bruce Farling

cc.  
FWP Commissioners Aldrich, Byorth, Colton

## Robson, Coreen

---

**From:** Mike <mhg4556@gmail.com>  
**Sent:** Monday, September 9, 2019 2:31 PM  
**To:** FWP Fish Regs 20  
**Cc:** Smith, Clinton  
**Subject:** comments tentative fish regulations

Dear FWP personnel,

Thank you for providing me the opportunity to comment on these tentative fishing regulations, and hosting a meeting in Lewistown.

The following are the proposals I wish to comment on -

Proposal 1 – Definition of Snagging - support

Proposal 20- Central Fishing District Standard Channel Catfish Regulation – support

Proposal 21 – Central Fishing District Standard Sauger Regulation – support

Proposal 22 – Ackley Lake Tiger Muskie – support, but question if an emergency order to quickly harvest an overabundance of muskies that have decimated the trout population would be better rather adding this regulation? Your call. My understanding is that the management goal for Ackley is to be a trout fishery with muskies used to suppress sucker populations, and not a muskie fisheries with a few trout.

Proposal 24 – Big Spring Creek – I have fly fished this creek on a regular basis since 1989 and have practiced catch-and-ethical release. I do not fish this creek for food, but for fun. Big Spring Creek, is not the productive fishery it was 30-years ago, not because of overharvest, but due to declining habitat quality, whirling disease, and other factors.

I spoke with the local FWP fishery biologist and researched this proposal. Here is what I found - The last creel survey conducted was around 2002 and showed only 3% of the anglers fished with the intent to kill trout. The catch and release regulation was implemented about the same time when fish were detected as having unhealthy levels of PCB's. This no longer is a concern after the PCB cleanup project was completed and successful. Total trout numbers are down about 50% since 2000. At the 8/22 FWP hosted public meeting on fishing regulations in Lewistown, I asked those present if they had observed anglers intentionally killing fish on Spring Creek which none had seen. Locally, the current catch and release regulation above the highway 191 bridge has been socially acceptable. Historically, rainbows dominated the creek, but after whirling disease was detected in 2004, browns have become dominant, with only the creek section above the highway 191 bridge still having more rainbows, and that appears to be changing slowly.

If this proposal is approved to simplify regulations, I doubt there would be any significant difference in future population numbers. I'm thinking harvest of some trout may help increase the average size, condition, and reduce the browns who may be feeding on juvenile rainbows.

Ackley Lake, Carter Ponds, and Hanson Creek Reservoir are the popular Lewistown sites for those who want to catch, keep, and eat trout. However, presently Ackley Lake is a poor trout fishery due to too many muskies; both Carter Ponds have winter killed the past two years; only Hanson Creek Reservoir remains productive.

Biologically, I have no basis to argue against this proposal, but socially I still like the current catch-and-release regulation. If opposition to this proposal is received, here are a couple possible compromises: 1) return Big Spring Creek to the Central District standard regulations, but make it catch-and-release for rainbows, 2) approve Proposal 22 to reduce the muskie population in Ackley Lake to improve the trout fishing there, and 3) install aerators in Upper and Lower Carter Ponds to reduce the potential of winter kill of trout.

Proposal 29 – East Fork Big Spring Creek – Same as above

Proposal 36 – Ice Shelter Removal – this should apply to the Central District, and maybe the Western District too. Last spring, I was unable to shore fish at several locations on Bair Reservoir because sunken ice shelters blocked my path. I don't know if the owners eventually removed these shelters or not. Rather than placing a regulation on when to remove a shelter from the ice, (too difficult to predict when this will happen), I'd rather see a provision that FWP or entity in charge will be reimbursed for the costs of extracting the debris, plus a citation.

Proposal 37 – Paddlefish Reorganization - support  
Proposal 43 – Musselshell River Sauger and Channel Catfish -support.

Sincerely,  
Mike Getman  
1607 Golden Eagle DR  
Lewistown, MT 59457  
Mhg4556@gmail.com

Sent from Mai for Windows 10

**Robson, Coreen**

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**From:** Gene Steadman <genesteadman@rocketmail.com>  
**Sent:** Monday, August 19, 2019 11:13 AM  
**To:** FWP Fish Regs 20  
**Subject:** Fees

Fees for resident seniors should be reduced to be comparable to other states Gene Steadman

Sent from my iPad



## Robson, Coreen

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**From:** cjohn95762@aol.com  
**Sent:** Thursday, August 22, 2019 10:52 AM  
**To:** FWP Fish Regs 20  
**Subject:** Fishing closure Request

I would like to offer comments on the proposed fishing regulations for 2020 and beyond. I would ask the commission to close the Big Hole river from Jerry Creek FAS to the Browns Bridge FAS to fishing for the period of October 1st to December 1st. The reason for the request is to protect the spawning Brown trout and preserve a world class fishing opportunity for other times of the year. I also would request the removal of the maggot designation throughout the year. Artificial lures/flyes should be the only means of take and would facilitate better release of fish and increase survival rate for released fish. Thanks for the opportunity to comment,

Casey Johnston  
2808 Elizabeth Warren  
Butte,  
MT 59701

2020 FWP Proposed change:

Page 60 change:

BIG HOLE RIVER

**Dickie Bridge to Melrose Bridges (Salmon Fly FAS)**

- Artificial lures only (see definition on page 20); *maggots allowed December 1 to third Saturday in May.*

- Extended season for Whitefish and Catch-and-release for trout open December 1 to the third Saturday in May with artificial lures (see definition on page 20) and/or maggots.

**Melrose Bridges (Salmon Fly FAS) to the mouth**

- Extended season for Whitefish and Catch-and-release for trout open December 1 to the third Saturday in May with artificial lures (see definition on page 20) and/or maggots.

My Proposed changes:

Page 60 change:

BIG HOLE RIVER

**Dickie Bridge to Melrose Bridges (Salmon Fly FAS)**

- Artificial lures only (see definition on page 20)

- Extended season for Whitefish all year and closed to fishing for trout from October 1 to December 1 Fishing allowed with artificial lures (see definition on page 20) only

**Melrose Bridges (Salmon Fly FAS) to the mouth**

- Extended season for Whitefish all year and closed to fishing for trout from October 1 to December 1. Fishing allowed with artificial lures (see definition on page 20) only

## Robson, Coreen

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**From:** Paul Millar <stateofmindfa@gmail.com>  
**Sent:** Thursday, September 5, 2019 9:20 AM  
**To:** FWP Fish Regs 20  
**Subject:** Fishing License Cost

We see so many visitors here in the Flathead that want to hire a fishing charter and fish for one half day but they decide not to after seeing that they need to buy a 2 day license for another \$50. Why not have an option for a 1 day License for \$25 or \$30?? I would think that equates to a win win for everyone.

Paul Millar  
State of Mind Fishing Charters LLC  
paul@stateofmindfishing.com

Sent from my iPhone

**Robson, Coreen**

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**From:** nancy@beartoothflyfishing.com  
**Sent:** Sunday, September 15, 2019 1:10 PM  
**To:** FWP Fish Regs 20  
**Subject:** Fishing Regs 2020

**Importance:** High

Dear FWP:

Please consider status quo on the Lower Madison in the regulations for 2020 instead of the permanent closure at this seems better based upon the temperatures and the science than imposing a permanent closure. The past couple summers it was not necessary to close the lower and the temps were okay. If you impose a permanent closure it could cause other negative issues for lack of access when access may be needed due to issues at other locations. This year was a good example of not needing to close that stretch and it enabled some spreading of folks that would go to other places if it were closed. Please reconsider going back to the science you have used historically. Thank you for your consideration.

Best Regards,

Nancy Delekta

Beartooth Flyfishing

406-682-7525

## Robson, Coreen

---

**From:** Kurt and Miriam Lewis <montanalewisfamily@gmail.com>  
**Sent:** Thursday, September 5, 2019 12:13 PM  
**To:** FWP Fish Regs 20  
**Subject:** fishing regulation change #7

The proposed regulation change #7, Main stem Flathead River gear restrictions, should be changed to include the river from Old Steel Bridge FAS to the confluence of the south and middle forks. Having the single hooks restriction starting at Teakettle FAS will lead to confusion and make education/enforcement all that more difficult downstream. Very few floaters go downriver of Old Steel Bridge because lack of public takeout opportunities, so that would cover most of the fished 'trout' water. By having the restriction above Teakettle, 13 miles of heavily travelled and fished river is being ignored.

Thank-you,  
Kurt R. Lewis

## Robson, Coreen

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**From:** JimTracy <jtkconner@q.com>  
**Sent:** Wednesday, August 21, 2019 10:03 PM  
**To:** FWP Fish Regs 20  
**Subject:** Fishing Regulations

Hi- Thanks for letting me comment.

I would like to voice support for three regulations.

1. The increase in the limits and decrease in the size for Tiger Muskie in Ackley Lake. The lake has been ruined for trout fishing these last two years. It is a waste of time traveling there.
2. Allowing the keeping of fish on Big Spring Creek and East Fork of Big Spring Creek by Lewistown. Since the department wasted millions of sportsmens dollars digging up the creek in a misguided attempt to clean the creek of PCB's, no fisherman was able to keep fish for over a dozen years. I fought that rule when I was in the FWP and I oppose it now. Fishermen should be able to get a fraction of our monies back that was wasted. The creek is not as good to fish due to the changes made in the way the hatchery is run and the horrible digging operation.
3. I support the decrease in the Catfish limits.

Again thanks for allowing me to comment.

Jim Conner  
Lewistown, Mt.

## Robson, Coreen

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**From:** Pieske, Shawna on behalf of FWP Commission  
**Sent:** Friday, September 6, 2019 8:14 AM  
**To:** Logan Brower; Pat Byorth (fwpdistrict2@gmail.com); Rich Stuker; Shane Colton; Tim Aldrich (Cartim8@gmail.com)  
**Cc:** FWP Fishing  
**Subject:** FW: Proposed change to Western district fishing regulations

**From:** FWP General  
**Sent:** Thursday, September 5, 2019 9:47 AM  
**To:** Hensler, Mike ; Williams, James  
**Cc:** FWP Commission  
**Subject:** FW: Proposed change to Western district fishing regulations

**From:** Riley VanNyhuis <[riley.vannyhuis@wpd.wa.gov](mailto:riley.vannyhuis@wpd.wa.gov)>  
**Sent:** Thursday, September 5, 2019 9:44 AM  
**To:** FWP General <[fwp@wpd.wa.gov](mailto:fwp@wpd.wa.gov)>  
**Subject:** Proposed change to Western district fishing regulations

To Whom it may concern,

Hello. I am a Flathead Valley native, and avid fisherman. I fish one to two times per week, every week, mostly for large, and smallmouth bass, as well as for northern pike. With our summer quickly coming to an end, it has gotten me thinking about the upcoming winter, and a subject that has frequently come up when chatting with many of the fellow anglers around the Valley. I, and many others have expressed some frustration in being limited to 2 lines per person, specifically when targeting northern pike while using tip-ups. The purpose of my letter is to find out how to propose a change in the regulations, to allow for a third attended line in the Western district.

While I am not a biologist, I look at other fisheries some even in different regions of our own state that allow for more tip-ups that have not seemed to cause any issues, or detriment to fish populations that I can find in my research. When speaking with fellow anglers, most feel that 3 tip-ups per angler would be acceptable. This would be an increase of 1 line per angler from our current regulation. While I don't see a problem simply allowing a 3rd line in general, an allowance for up to 3 lines, or even specifically tip-ups could be made for certain lakes, especially pike fisheries. Another option is to allow for the additional line only during winter months or more specifically ice fishing. Furthermore, another method could be to allow the purchase of a tag or stamp for the use of an additional line when purchasing our fishing license similar to the warm water stamp from several years back. As a bonus this would help boost income for future conservation. While I may only be dreaming, it might also be an option with this final method to allow for a fourth line at a MUCH steeper cost.

I don't foresee an increase like this causing a strain on fish populations because most lakes that might be impacted already have some form of limit, or slot size that you are allowed for each day already in place. In lakes where you might feel this could be a threat to populations, you could even limit the use of lines for that lake alone. If you were to go with the method of purchasing a stamp to allow for the third line, I believe this would also somewhat regulate it's self, as I feel only the more avid fisherman would choose to make the purchase while more casual fisherman would forgo the upgrade.

In closing, I hope that you will consider this request. I believe it would be a very welcome change based of my conversations with fellow anglers, biologists, and even fish and game officers. I am certain that a well thought out change could be made, so as to not affect, or damage our wonderful fisheries. If you have any question please don't hesitate to email me at this address, or call me at 406-253-6663.

Thank you very much for your time,

Riley VanNyhuis

## Robson, Coreen

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**From:** Roberts, Eric  
**Sent:** Monday, September 16, 2019 9:46 AM  
**To:** Wedde, Kim; Dyer, Jorri  
**Subject:** FW: Regulations at Dry Bridge Park

Please include this with the email comments for the regs. Thanks.  
ER

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

From: Jean Paschke <paschkedj@montanasky.net>  
Sent: Sunday, September 15, 2019 7:11 PM  
To: Roberts, Eric <ERoberts@mt.gov>  
Cc: Hensler, Mike <MHensler@mt.gov>  
Subject: Regulations at Dry Bridge Park

To Whom It May Concern:

My name is Jean Paschke and I am a retired teacher from Kalispell's SD5. The last 8 years of my teaching career I taught fourth graders at Cornelius Hedges School.

I recently heard about a potential change of the restrictions that are now in effect at Dry Bridge Park. It is my understanding the change would allow everyone - adults and children - to not only fish at Dry Bridge, which is the current status, but would also allow adults to keep their fish, according to the day's allotted amount.

I would like to register my objection to this plan based on my experience with children and the park.

Each year when I taught 4th grade the children participated in a wonderful program called Hooked On Fishing. Through this program they learned a great deal not only about fishing but also about Montana's fish, their habitat, fishing regulations, how to rig up their own gear, tie flies and so much more. Through this program they also learned about being a good citizen of their state by taking care of it's natural resources.

Along with this program we also helped stock Dry Bridge Park pond. What a thrill for the students to see those huge fish! The evening of the day that we stocked would find the pond ringed with fourth graders and their friends all excitedly casting for the big one! Their enthusiasm continued throughout the school year and into the summer. I would often see them riding their bikes on their way to Dry Bridge with a rod slung over their shoulder.

Living near Dry Bridge Park offers me and my dog the opportunity to walk around the pond most evenings. I very often see children fishing, eager to show off their catch or to just talk about fishing.

I am asking that you leave the restrictions as they are with adults able to fish but not able to keep the fish they catch. Leave this one spot for the kids. The adults, who have transportation and a way to go elsewhere, have ample fishing spots.

If adults are allowed to keep their fish at Dry Bridge they will very quickly replace the children. A spot near town that is amply stocked will entice many adult fisherman and the pond will quickly be depleted.

As it is now the children feel comfortable practicing the skills they need to be good fishermen. Their parents are able to take them fishing for a few hours in the evening. How many places like this are left for our kids? Not many, I'm afraid.



In summation, I hope that you will take the children into consideration as you make your decision. I ask that you leave Dry Bridge fishing as it is now - for the kids.

Most Sincerely,

Jean Paschke

## Robson, Coreen

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**From:** Mark Magill, MD <mmagill@krmc.org>  
**Sent:** Friday, August 23, 2019 3:39 PM  
**To:** FWP Fish Regs 20  
**Subject:** input

I agree with the changes to single hook lures. I would also agree with barbless hooks on all forks.

I floated the northfork one month ago and on a 5 mile stretch saw at least 5-10 dead cutthroat trout.

With overall pressure up on these rivers, this limited resource is being abused.

I would also be in favor of permitting to protect the flathead rivers as well.

Thanks

Mark Magill  
84 Wedgewood Lane  
Whitefish, MT 59937

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**Robson, Coreen**

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**From:** Clayton Elliott <clayton@montanatu.org>  
**Sent:** Friday, September 13, 2019 12:34 PM  
**To:** FWP Fish Regs 20  
**Subject:** Montana Trout Unlimited Comments on Fishing Regulations  
**Attachments:** 2020FishRegMTUComments.docx; ATT00001.htm; 0.jpg; ATT00002.htm

Please find attached. Thank you!

Clayton

**Clayton Elliott**  
*Conservation and Government Affairs Director*  
**Montana Trout Unlimited**

[clayton@montanatrout.org](mailto:clayton@montanatrout.org)

o: 406-543-0054

c: 307-272-6298

[www.montanatrout.org](http://www.montanatrout.org)



September 15, 2019

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

Montana Fish and Wildlife Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Montana 59620-0701

Re: Montana Trout Unlimited comments on *Proposed 2020 Fishing Regulation Changes*

To Whom It May Concern:

Thank you for the opportunity to provide comments on the *Proposed 2020 Fishing Regulation Changes*. As we have reviewed the document, it is evident that a great deal of work and deliberative consideration went in to the development of these proposed changes. We appreciate the ability to have had the opportunity to be involved in the process, and we wanted to be sure to continue our participation in the process by offering formal written feedback on these proposed changes. Montana Fish, Wildlife, and Parks, and the Fisheries Division in particular, have gone above and beyond to involve the public through both the scoping and public comment process. We appreciate that effort and commitment to a robust public process.

Founded in 1964, Montana Trout Unlimited is the only statewide grassroots organization dedicated solely to conserving, protecting, and restoring Montana's coldwater fisheries. Montana Trout Unlimited is comprised of 13 chapters across the state and represents approximately 4,500 Trout Unlimited members. A number of our chapters and local members helped inform the comments on the proposed changes that are found below.

Montana Trout Unlimited has great interest in the effects of proposed changes to Montana's fishing regulations, especially given the increasing challenges facing our native fish resources by threats like climate change, competition and predation from introduced species, and increasing angling pressure. We continue to promote fisheries management that preserves and improves populations of wild fish, with a significant priority on native fish species, such as cutthroat trout, bull trout, and grayling. While our fishing regulations are but one tool that is available through which we can accomplish these goals, we do believe that they do play a significant role in native fish conservation.

Montana Trout Unlimited offers our support the following proposals in the *Proposed 2020 Fishing Regulation Changes*:

- *Proposal 4 (Clark Fork River)*: This proposal cleans up the regulations by making fishing catch and release only for Cutthroat Trout from the mouth of the Thompson River to the Idaho border (namely the Thompson Falls, Noxon Rapids, and Cabinet Gorge Reservoirs). We support the standardization of Westslope Cutthroat Trout management on the entire Clark Fork River, and therefore we support this proposed change to catch and release for Westslope Cutthroat on this stretch of the river.
- *Proposals 7, 9, 10, and 15 (Main, South, North, and Middle Fork Flathead River)*: We support these proposals to restrict terminal gear for the mainstem Flathead and tributaries, including the main three forks above Teakettle Fishing Access Site. Under these changes, anglers would be restricted to single pointed hooks, no treble or double pointed hooks. We know that angling pressure on native fish in these waters has drastically increased in recent years and that increase is forecast to continue. Our members have seen and heard from many local anglers and guides alarming and often fatal mouth damage (ripped mandibles, missing mouth parts) due to hooking-caused wounds, as well as reports of dead fish, likely due to poor playing and releasing techniques, dangerous terminal tackle and increasing angling pressure. Treble hooks play a large part in these wounds. We support efforts to eliminate the use of multi-pointed hooks in the Flathead River system. We believe that removing multi-point hooks from use on populations of threatened native fish will result increased survival and in better overall survival of the population. Again, Montana Trout Unlimited supports these proposals.
- *Proposal 17 (Swan River)*: We support the conservation of the native Westslope Cutthroat Trout populations in their native range, and therefore we support the proposed change to catch and release regulation for Cutthroat Trout and liberalization of limits on Rainbow Trout on the Swan River.
- *Proposal 34 (Smith River)*: With the increasing river usage and angler pressure on the Smith River earlier in the season (i.e. March-May), we believe that the proposed changes to implement the standard fishing season (the third Saturday of May through November 30<sup>th</sup>) for the tributaries between Camp Baker and Eden Bridge to be a responsible regulation change to protect spawning fish during these early months. In these months during higher flows on the mainstem, anglers are increasingly targeting these short stretches of tributaries putting unnecessary stress on spawning populations of Rainbow Trout. We support this proposal.

Montana Trout Unlimited supports modifications to the following proposals to the *Proposed 2020 Fishing Regulation Changes*:

- *Proposal 2 (Western District Bass Regulation)*: As part of *Proposal 2* to change the standard regulation of Bass in the Western District, the Department would separate regulation of Largemouth and Smallmouth Bass and set a possession limit on

Smallmouth Bass of 15 daily and in possession. Montana Trout Unlimited does not feel that treating an illegally planted, aggressive species as a normal game fish and as such believes that setting limits and seasons is consistent with the intent of the Unauthorized Placement of Fish rule (ARM 12.7.1501). The proposal itself notes that there have been 18 confirmed illegal introductions of Smallmouth Bass in the past years and that Smallmouth Bass can outcompete native fish populations. During the scoping process, 68% of respondents supported no possession limit for illegal Smallmouth Bass, but the Department decided to include a 15-fish limit, which moves down the road toward making this dangerous invader an accepted part of our fishery and establishing more illegal populations in Western Montana. We suggest reverting to the original no possession limit in the final regulations.

- *Proposal 31 (Lower Madison River)*: Under this change, the Department is proposing a permanent “Hoot Owl” restriction for the Lower Madison River from Warm Springs Day Use Area to the confluence of the Jefferson River from July 15 to August 15. Fishing would be prohibited from 2 p.m. to midnight during those thirty days. Montana Trout Unlimited strongly supports protecting trout during these acutely warm water conditions – the likes of which have become the norm for this stretch of river in recent years. We are concerned about the lack of the consistent use of this important tool across the state as we are seeing increasingly warmer waters that are negatively impacting native fish, often because of real or perceived challenges in the short notice of public education and enforcement challenges. We believe that moving to permanent Hoot Owl restrictions will actually make the regulations more predictable and user friendly for anglers. Our only suggestion is to go back to the original proposal that was offered during the scoping period of the Hoot Owl restrictions being in place on the entire stretch below Ennis Dam for the entire months of July and August. 72.5% of survey respondents supported that proposal, and it is certainly supported by the scientific data on stream temperatures on this stretch in recent years. The water temperatures are predictably exceeding healthy thresholds every year, and the original proposed regulation change would be more protective of the fishery resource in this stretch. We hope that you revert to it before you finalize the regulations.

Montana Trout Unlimited opposes the following proposal to the *Proposed 2020 Fishing Regulation Changes*:

- *Proposal 33 (Missouri River below Holter Dam)*: Montana Trout Unlimited fully believes that this stretch of the Missouri River below Holter Dam to Cascade should be managed first and foremost as a wild, coldwater trout fishery. We cannot support these proposed changes to the regulations that would compromise the integrity of this world-class trout fishery, and we have long advocated for the current regulation of an unlimited harvest on non-native predatory species like Walleye. The Department should prioritize the management of wild, coldwater trout in this stretch of the Missouri, as they have done, and they should continue to robustly monitor the effect that non-native species, like Walleye, have on the populations of wild Rainbow and Brown Trout in the Missouri.

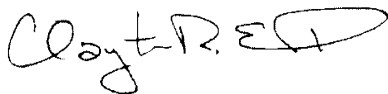
Beyond the existing proposed changes that we have commented on above, a number of our chapters and member leaders have expressed the need to continue to offer our support for more aggressive efforts to protect native fish through the fishing regulations. First, in regard to terminal tackle we continue to support more aggressive and widespread restrictions on the use of live bait in our coldwater fisheries. Nearly all-scientific studies have found that fishing with bait drastically increases injury to fish. Additionally, we continue to support more widespread use of barbless hook regulations in our most prized native fish water bodies. While the use of barbless hooks cannot definitively be proven to drastically reduce mortality, it is well known that it is easier to release a fish from a barbless hook, which reduces handling time and air exposure. Lastly, as noted in our comments concerning Hoot Owl restrictions on the Lower Madison, Montana Trout Unlimited would support more aggressive permanent and mandatory temperature triggers that initiate Hoot Owl restrictions on our coldwater streams and rivers. In the summer of 2019 there were at least eight streams that reached and sustained water temperatures over 73 degrees for three days – only one, the lower Big Hole had Hoot Owl restrictions enacted.<sup>1</sup> For the reasons previously stated, we support more predictable triggers for Hoot Owl regulations that also better protect our fishery resources.

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 [mttu@montanatrout.com](mailto:mttu@montanatrout.com) or by phone at 406-543-0054). Again, we thank you for the opportunity to comment, and we appreciate the open public process used by the Department to make these changes.

Respectfully,



David Brooks  
Executive Director  
Montana Trout Unlimited



Clayton Elliott  
Conservation and Government Relations Director  
Montana Trout Unlimited

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<sup>1</sup> The following rivers met the 73 degree criteria for 3 days as of August 9, 2019: Jefferson, Lower Gallatin, Lower Big Hole (Hoot Owl enacted on August 8<sup>th</sup>), Lower Beaverhead, Ruby, Upper Clark Fork, Lower Bitterroot, and Lower Clark Fork Rivers.



cc:

FWP Director Martha Williams

Fisheries Division Administrator Eileen Ryce

Fish Management Supervisor Eric Roberts

Natural Resource Policy Advisor to the Honorable Steve Bullock, Patrick Holmes

FWP Regional Fish Biologists

## Robson, Coreen

---

**From:** Thomas Bartley <thomas.william.bartley@gmail.com>  
**Sent:** Friday, August 23, 2019 1:39 PM  
**To:** FWP Fish Regs 20  
**Subject:** New fishing regulations on the forks of the Flathead River

To whom it may concern:

Hello, For the last 30 years, my family and I have always cut hooks off of lures, and pinched the little barb hook. We were tired of fish dying on us while we were trying to get all 3 hooks out. Since then, we've never had any problems keeping the fish alive while getting the hooks out.

It also was too easy to catch the fish with 3 hooks. Taking some hooks off gives the fish a better chance, and takes more skill by the fisherman to set the hook, and land it.

I hope this new regulation get's passed, and is very strictly enforced.

Another issue: Permits on the North Fork

As much as I would hate to have to wait for a permit, I think floating on the North Fork should also require a permit. There's simply too many people on the river, and too many of them do NOT take care of it the way they're supposed to.

## Robson, Coreen

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**From:** Stafford, Nick <nick.stafford@simmsfishing.com>  
**Sent:** Friday, September 13, 2019 9:09 AM  
**To:** FWP Fish Regs 20  
**Subject:** Process For Requesting Change of Regulation

**CAUTION:** This email, its attachments and any links contained within are potentially unsafe.

We scan email attachments for malicious software to protect your computer and the State's network. If we determine that an attachment is unsafe, then we block it and you will only see an attachment called 'Unsupported File Types Alert.txt'. If we cannot scan an attachment, then we provide this warning that the attachment may be unsafe and advise you to verify the sender before opening the attachment. If you don't see a file attached to this message, it doesn't mean that we blocked it, some email signatures contain image files that we cannot scan. Please contact your agency IT staff for more information.

Hi – can you advise as to what is necessary to submit a request to change regulations?

Cheers,  
Nick

**Nick Stafford** | Sr. Director, Technology  
177 Garden Drive  
Bozeman, MT 59718  
406-922-2030 (w) | 406-518-1850 (m)



**Robson, Coreen**

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**From:** Jenny Harris <gppmmda@gmail.com>  
**Sent:** Tuesday, September 10, 2019 3:15 PM  
**To:** FWP Fish Regs 20  
**Subject:** Proposed 2020 regs support  
**Attachments:** Proposed 2020 fishing regs.docx

Please find our letter of support attached.

To whom it may concern,

As a concerned organization for Montana sportsmen, we would like to voice our support for the following proposed changes to the 2020 fishing regulations.

(Proposal #27) To allow spearing Northern Pike through the ice on Canyon Ferry lake.

(Proposal #33) To set a limit of 20 for Walleye below Holter Dam to Cascade bridge.

Best Regards,

Tom Casey

President GPPMMDA

## Robson, Coreen

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**From:** d pier <depier70@gmail.com>  
**Sent:** Saturday, August 24, 2019 8:40 PM  
**To:** FWP Fish Regs 20  
**Subject:** Proposed changes for Flathead Fisheries

I fully support the proposed change to single hooks only for the Three Forks of the Flathead River system. Further, it should be required for the entire drainage above Flathead Lake (including sloughs and backwaters), in order to make enforcement and adherence more effective. Use of single hooks only does not impact catch rates, and more effectively aids an easy release of fish, promoting survival. Current Public knowledge and practice for releasing fish while ensuring minimal damage is very much deficient, which significantly affects catch and release mortality. This proposal, if incorporated, would offer a cheap, effective, easily adapted method to help ensure quality fisheries and ensure WCT and DV population survival and enhancement.

D. Pier  
Columbia Falls, MT

Sent from [Mail](#) for Windows 10

## Robson, Coreen

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**From:** Jim Vashro <jsjvash@montanasky.us>  
**Sent:** Sunday, September 15, 2019 6:24 PM  
**To:** FWP Fish Regs 20  
**Cc:** Hensler, Mike  
**Subject:** Proposed Fishing Regulations for 2020-2024

I completed the online survey on behalf of Flathead Wildlife, Inc. in my role as President. The Board of Directors only commented on several regulations it reviewed. Ironically, since I did the survey I, by my email address, am now blocked from taking the survey again so I will submit my comments in this email.

1. Western District Bass Limit
  - I support this proposal. It simplifies regulations for most waters. It increases the daily bag limit on smallmouth bass, most of which have been illegally introduced. This is in keeping with FWP policy. The proposal does keep a few longstanding managed smallmouth fisheries while better reflecting the biology and management of largemouth bass in the Western District.
2. Bull Lake Northern Pike Spearing
  - I support the intent of this regulation, it follows FWP policy on illegal introductions. Two things to watch for: 1) Bull Lake does have bull trout and other game fish and there is often temptation to illegally spear those fish and, 2) spearers cut holes up to 3'x3'. Those holes after use pose a hazard to other recreationists as the holes skim over and get snowed on. Spearers should be encouraged to mark holes after use.
3. Clark Fork River Bass Regulation
  - I support, this standardizes the regulation and hopefully is more understandable to anglers
4. Dry Bridge Pond
  - I oppose this proposal to eliminate the family Fishing Pond regulation (everyone can fish, only 14 and younger can harvest 1 fish/day) and replace it with a general 5 trout limit for all. This proposal came about due to a reluctance to plant rainbows in the pond because they will not overwinter and due to complaints about dead fish. I walk my dogs around this pond nearly every day so I am well tuned in. The dead fish complaints occurred when large brood rainbows died, they tended to float a long time and nothing cleaned them up. It is unfortunate to deny a kid the chance to catch a big fish but no brood were planted this year and it solved the odor problem. Dry Bridge was the 1<sup>st</sup> Family Fishing Pond in Region 1. I admit it took a change in thinking to plant fish that could not overwinter but that was overcome when I saw the response of the neighborhood. Hedges School is nearby, their Hooked on Fishing Classes help plant the rainbows. After school I see kids hike and bike in to catch "their" fish, after supper I see families and couples walking in. Parents tell me they take the kids fishing instead of mowing lawns or shopping because it is convenient. Use of Dry Bridge has dropped a little as other ponds came online but there are still people there every day/night for 3 months. This year I only saw 1 smaller dead fish floating, it was early so it was probably catch and release mortality. There may have been more but resident ospreys and a bald eagle are an efficient cleanup crew to the delight of people around the pond. I also see adults drive in to fish the pond. In mid-May a twenty-something angler told me he was catching over a dozen fish per night. There is a real demand for pond fishing in Kalispell, if Dry Bridge is opened to general harvest adults will quickly clean it out, then drive somewhere else. That will leave no fish for the young neighborhood kids who can't hike or bike elsewhere. My wife taught at Hedges School, a lot of kids don't have families who will take them fishing. Also, just a week ago I encountered two kids about age 12 fishing the pond. I asked how they were doing, they said they caught several fish the week before and while I was talking to them one caught a 17" rainbow. I saw similar fishing last fall. Some fish over-summer but the number stocked is gauged so most fish are caught out before winter. Region 1 kills thousands of non-native trout each year in the name of native fish conservation. They helped with chemical renovation of 3 lakes in Glacier Park 2 weeks ago and just announced a plan to

electrofish and kill rainbows in a Swan River tributary. It seems incongruous the Region would quibble over the possible loss of a few hatchery rainbow trout when the intent is to get youngsters “Hooked On Fishing”.

## 5. Flathead River Gear Restriction

- My comments are for all 3 forks and the mainstem river. I do not support this proposal at this time. This proposal would cover 230 miles of river plus all the tributaries. I appreciate a desire to be proactive, however, fish populations are stable and there does not appear to be an urgent need to make a change of this sort. There should always be attempts to “Educate Before You Regulate”, that has not occurred. I worked on both Arlee rainbow and westslope broodstocks early in my career, spawntaking is an extreme form of handling. Cutthroat did not appear to be more sensitive than rainbows, my fishing experience backs that up. Any changes in fishing regulations should address an identified problem and propose a change that will bring about meaningful change. The early rationale for a single hook regulation was to reduce hook scarring. Later discussions talked about cumulative mortality. Hooking scars are a fact of life in catch and release fisheries, the 40% rates in Flathead cutthroat are not out of line. No studies have shown hooking scars to decrease survival or performance in fish. Pope, Wilde and Knabe (2007) looked at survival of rainbows caught 1-4 times over a month, there was no impact on survival or growth. Most studies have looked at mortality rather than performance. Dubois and Dubielzig (2004) looked at one month mortality of rainbows caught with barbed single (3.1%) and barbed treble (3.4%) hooks, the results were not statistically significant. Taylor and White (2011) compared mortality between gear types with single hooks (14 studies, 4.8% mortality) and treble hooks (10 studies, 4.7% mortality). There are a number of similar studies. Schill and Scarpella (1997) did a meta-analysis of catch and release studies, they concluded there was so little difference between barbed and barbless and hook points that it was a social, not biological, decision. The Region argues that small (>3%) differences in mortality will add up over multiple catches, however, when a rate is statistically insignificant, multiplying it many times still leaves it statistically insignificant. Natural mortality can range from 30%-60% within age classes, populations naturally fluctuate 20% or more between years. A regulation needs to bring about major changes, such as the 35% survival rate difference between bait and artificials, to be seen. There are other problems. This proposal relies on a creel on the lower 10 miles of the entire area. That creel did show a higher than expected use of artificials (trebles?). However, the section is right next to Columbia Falls and Hungry Horse where you might see more casual anglers. My impression is that upper river users tend more toward flies and anglers using artificials tend to catch less fish. That would further weaken any benefits, there needs to be more creel work. The Flathead is primarily a migratory (adfluvial) fishery, cutthroat readily move downstream of the section boundary through the main river to Flathead Lake where this regulation would not apply and which will complicate analysis. That is also why there aren't many larger trout in the upper river, they evolved to move. Biologists speculate the upper sections hold more fluvial or resident trout. That may be, however, there needs to be a tagging study to confirm that. It is also puzzling why Hungry Horse Reservoir and the lower Flathead River are excluded, fish moving in and out would be exposed to treble hooks there.

Regulations tend to get inertia, if this regulation is adopted and shows no results, it will still be very hard to repeal it. Likewise, a single hook regulation based on hook scarring could be precedent setting and if adopted could lead to demands for similar restrictions on other high use waters statewide. One angling group has already said they will support the single hook restriction but their real goal is single barbless hooks and no bait.

There is no crisis, regulations for native fish can occur in any year. This proposal needs a lot more work before it is adopted. If the Commission feels it really needs to try something, it would make more sense to adopt this on an experimental basis just for the South Fork Flathead. The South Fork has defined boundaries, half or more is in wilderness. The South Fork also has a targeted bull trout fishery in the reservoir and river, bull trout are sensitive to handling. However, to be most effective a regulation should include Hungry Horse Reservoir since cutthroat and bulls migrate in and out and many reservoir anglers use lures for trolling and casting.



6. Flathead River Sloughs

- I support this proposal. The Flathead River Sloughs connect to the main Flathead River but function more like warmwater lakes than a coldwater stream. Anglers get confused as they move back and forth, hopefully this helps.

7. River's Edge Pond

- This pond will make an excellent addition to the Family Fishing Pond system, the proposed regulation lets everyone (families) fish but stretches out the plant by keeping harvest to age 14 and younger. Young anglers need that encouragement.

8. Swan River

- I support this proposal. It would simplify regulations and place cutthroat under catch and release. It is unknown how much angling harvest reduces cutthroat but they are more easily caught than rainbow trout.

9. Thompson River

- I will support this proposal but the past winter closure of the upper river was intended to provide protection for rainbows while they are spawning. Monitoring will be needed to ensure anglers aren't unduly targeting spawning rainbows. The Thompson is an "upside-down" river, warmer at the top than the bottom. It remains to be seen if this regulation will give rainbows and cutts an advantage over brown trout which tolerate warm water better.

10. Thompson Park Pond

- One last proposal that I mentioned during scoping that didn't make it into the proposals is a Family Fishing Regulation for Thompson Park Pond. Under Family Fishing, everyone can fish, harvest is limited to ages 14 and younger. The pond is adjacent to Thompson Falls State Park and about 1 mile out of Thompson Falls. Kids can use a secondary road to hike or bike to the pond. The pond is in a good location, Avista Corporation did some work to renovate the pond and access. Leaving it open to general fishing will clean it out in short order, Family Fishing would allow everyone to fish but stretch out the benefits of a plant. Earlier planting and restricting harvest to kids would provide a lot of recreation. If a regulation is going to be adopted it should occur sooner rather than later when adults get used to fishing the pond.

Thank you for the opportunity to comment. It is awkward commenting based on my former position as fisheries manager. However, I managed and fished the waters above for almost 40 years and I went through 3 dozen fishing regulation cycles so I think I have some valid insights on both fish and angler behavior. Good Luck, Jim Vashro



Virus-free [\[link\]](#)

## **Robson, Coreen**

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**From:** Maynard Feist <maynardfeist@yahoo.com>  
**Sent:** Saturday, August 24, 2019 12:48 PM  
**To:** FWP Fish Regs 20  
**Subject:** Proposed Fishing Regulations

I would like to object to charging non-residents and residents that do not have a boat an AIS fee. Since this fee has been implemented I can no longer afford to take my children, grandchildren, and great grandchildren, from out of state, fishing when they come to visit during the summers. I have friends from out of state that have also stopped coming to fish with me because of this fee. I am not familiar with any other states policies, with the exception of Wyoming, and I do feel Wyoming's system is a lot more fair to fishermen than Montana's. People that don't fish, from in or out of state, that enter our waters with watercraft are not sharing in funding the AIS program, which is not right. I do not know any fishermen that feel Montana's AIS fee system is equitable and I would highly recommend that it be modified for future years.

Thank You for the opportunity to comment:

Maynard Feist

## Robson, Coreen

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**From:** Kevin Weiner <fishweinner@gmail.com>  
**Sent:** Monday, August 26, 2019 10:19 AM  
**To:** FWP Fish Regs 20  
**Subject:** Proposed Regulation change for Red Rock River

Hello,

I proposed this change outside of the public comment period but I figured I would go ahead and re-submit it now so it can be official.

The Red Rock River upstream on Clark Canyon Reservoir harbors one of the strongest populations of mountain whitefish in SW Montana but the regulations do not allow anglers to harvest or even fish for them in the winter/spring when they are most commonly targeted. This is one of only two streams in the Dillon area that is closed during the winter and spring months with the other being the Beaverhead River which makes sense as a heavily managed system.

I believe that the closure stems from the spawning of non-native fish coming from the reservoir but does not warrant a closure due to limited recruitment augmented by a large number of hatchery fish stocked every year in the reservoir. I question the need for any regulation on this stretch of river but am not opposed to a catch and release season for trout during the current closure period.

I propose that the regulations be changed from "Open third Saturday in May through the end of November" to "Extended season for Whitefish and catch-and-release for trout open December 1 to the third Saturday in May with artificial lures and/or maggots".

"Combined trout: 3 daily and in possession, only 1 over 18 inches" is fine and does not need to be changed.

I believe this is an important change and would provide a needed fishery in the Dillon area. I do not see a scientific reason for the current regulation and can provide more details if needed for the change in regulation. Please feel free to contact me with any questions.

Kevin Weiner  
736 South Washington Street  
Dillon, MT  
406-925-3213

**Robson, Coreen**

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**From:** warren johns <ichthyologist55@yahoo.com>  
**Sent:** Saturday, September 14, 2019 6:42 AM  
**To:** FWP Fish Regs 20  
**Subject:** Regs.

It's way past time to implement barbless (or pinched down barbs) on all rivers in Montana. Seriously folks, you're way behind other states in this regard.

My Two Cents.....Warren Johns.

**Robson, Coreen**

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**From:** Richard Mayo <mayorealestate@gmail.com>  
**Sent:** Friday, September 13, 2019 9:18 AM  
**To:** FWP Fish Regs 20  
**Subject:** Response to regulation changes

To whom it may concern:

I support all of the proposed changes made in the email I received on 9/12-13 2019. They seem to be sensible changes and would protect the fisheries that I treasure.

Thanks for including me in the comments.

Best Regards,  
Rich Mayo

**RICH MAYO**  
MANAGING BROKER, CRS, GRI, ePRO  
3624 W COLLEGE SUITE A  
BOZEMAN, MT 59715

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## Robson, Coreen

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**From:** Paul Stanley <pstanley761@gmail.com>  
**Sent:** Thursday, September 12, 2019 7:19 PM  
**To:** FWP Fish Regs 20  
**Subject:** Return to traditional trout fishing season

We live on the Gallatin. Since the season was opened for year round fishing, people living around our heavily populated area can invite friends over for catching fish every day and decimate the spawners on the redds on all the small feeder creeks during November and May. You should take a look at the policy. This has been happening and when my wife hears about the wonderful "fishing" on the Gallatin at her hairdressers' you can be sure it's pretty common practice.

Think it over!

Paul Stanley  
77777 Gallatin Rd  
Bozeman Mt 59718

## Robson, Coreen

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**From:** Johnny Alamilla <jgalamilla@gmail.com>  
**Sent:** Thursday, August 22, 2019 6:13 AM  
**To:** FWP Fish Regs 20  
**Subject:** Survey input

as a long time angler I completely agree with restricting treble hooks on all the forks of the flat head. i have seen and witnessed much damage to the mouths of fish and hope we can work toward barbless hooks one day

truly johnny alamilla

## Robson, Coreen

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**From:** Wiles, Evan K <Evan.K.Wiles@centurylink.com>  
**Sent:** Friday, August 23, 2019 2:29 PM  
**To:** FWP Fish Regs 20  
**Subject:** treble hooks Flathead Valley

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Hi,

In my experience fishing it is not the treble hooks that are killing the fish. The treble hooks usually catch the lip and are easy to get out. I usually use big spoons for

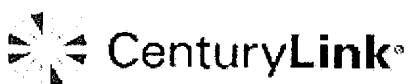
bigger fish. But what I have seen is for instance is dry fly fishing with for instance a mosquito and the smaller fish usually go after it, like small cutthroat and they

usually swallow it deep in there bellies. Then they have to use their special hook tool you see to get the hook out. Those small fish usual die because they are so

small.

*Thank You,  
Evan*

**Evan Wiles**  
**Plant Technician**  
**28 6<sup>th</sup> St. West**  
**Columbia Falls, MT 59912**  
**(406) 249-3994**  
[evan.k.wiles@centurylink.com](mailto:evan.k.wiles@centurylink.com)



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## Robson, Coreen

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**From:** Eldon Mickelson <calln7hxj@gmail.com>  
**Sent:** Sunday, August 25, 2019 9:50 AM  
**To:** FWP Fish Regs 20  
**Subject:** treble tackle

Sirs:

It's harder to catch something  
for a meal.

We need more stocking not less  
hooks.

Eldon

Regarding AIS

FWP.MT.GOV



THE OUTSIDE IS IN US ALL.

8/26/2019

COMMENT FORM

Name Sherry Hookema Address 9484 Nash Road, Bergman 59715

If AIS station closes at Canyon Ferry is it possible to put a wash unit at the Regional Office in Bergman, so those of us that want to fish in Wyo or Idaho could get inspected before we enter another state.

Just a suggestion & food for thought.

2020 Fishing Regulations  
Public Comment: Missoula Open House, 8/29/2019

Single, barbless, catch and release  
everywhere!

Name: H Lewis

Address: 158 Bell King East, Stevensville, MT

Contact (phone\email): hcregg@comcast.net 59870

406-777-5085 (h)

415-971-8119 (c)

Leave at the Open House or  
Mail to: Fishing Regulations  
PO Box 200701  
Helena, MT 59620



2020 FISHING REGULATION PROPOSALS

COMMENT FORM

Date: 8-20-19  
 Name: Jeff C Dibblee  
 Please PRINT  
 Address Street P.O. Box 621  
 City/State/Zip HAWE MT 59501

Please write your comments to the Tentative Fishing Regulations below. Attach additional information to this form if you wish.

Snagging should be allowed from  
still or stationary water craft.

Anchoring or tying off only

Due to increase in crowd(s) and  
safety to those along the shore  
due to crowding, water craft would  
"spread" out the fisherman.

The risk of snagging non-target  
species is just as great on shore  
as in a water craft.



## 2020 FISHING REGULATION PROPOSALS

## COMMENT FORM

Date:

8-20-19

Name:

Jeff C Dibblee

Please PRINT

Address Street

P.O. Box 621

City/State/Zip

HAWE, MT 59501

Please write your comments to the Tentative Fishing Regulations below. Attach additional information to this form if you wish.

Time Limits are OK with me, However  
Access to House removal was a serious  
issue at Kremlin Bay (Fresno).

The single road leading into the Bay  
was so snow packed that I had to  
wait until mid-march to remove my  
House.

I set well up the shore until the  
roads dried.

Consideration should be made to  
Access and/or Notification of road  
"clearly" via media for fisherman  
to retrieve their property safely.