

# #1

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Saturday, July 16, 2022 1:15:30 PM  
**Last Modified:** Saturday, July 16, 2022 1:37:42 PM  
**Time Spent:** 00:22:12  
**IP Address:** 69.145.169.203

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Page 1

## Q1

Contact information:

Name:	<b>Greg J. Houska</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>gjhouka@aol.com</b>

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

So, rivers will not be covered? What happened to all the rivers? Rivers don't count? Why not make it ANY water body that is flowing.

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## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, July 18, 2022 9:32:01 AM  
**Last Modified:** Monday, July 18, 2022 9:46:05 AM  
**Time Spent:** 00:14:03  
**IP Address:** 75.143.220.117

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Page 1

### Q1

Contact information:

**Name:** Gordon Robinson  
**City/Town:** Great Falls  
**State/Province:** MT  
**Email Address:** somwill99@hotmail.com

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### Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I think you are getting this dialed in and it's important to have these restrictions. I believe the new language and proposal is adequate.

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# #3

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, July 18, 2022 11:09:30 PM  
**Last Modified:** Monday, July 18, 2022 11:14:23 PM  
**Time Spent:** 00:04:53  
**IP Address:** 69.145.22.162

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Page 1

## Q1

Contact information:

Name:	<b>Paul Gilbertson</b>
City/Town:	<b>Hamilton</b>
State/Province:	<b>MT</b>
Email Address:	<b>irpabkind@outlook.com</b>

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support these rules. We need to protect are fisheries. Thank you.

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# #4

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, July 19, 2022 10:16:50 PM  
**Last Modified:** Tuesday, July 19, 2022 10:33:18 PM  
**Time Spent:** 00:16:28  
**IP Address:** 174.204.9.184

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Page 1

## Q1

Contact information:

Name: **Jed Fitzpatrick**  
City/Town: **Hamilton**  
State/Province: **MT**  
Email Address: **bitterrootriverguides@gmail.com**

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

While I admire the lowering of the baseline temperature for hoot owl restrictions, I personally think that 66° is too low to create a hoot owl situation. On my Bitterroot river depending where you measure the temperature in the water column, a high of 66 on our system, especially with the water volume we see this year, is extremely healthy and nowhere near risk due to heat to our fish. 68° at a minimum would be reasonable to protect fish due to heat stress and angling pressure, and that is in the top layer of the river not in the depths where fish will recede through the heat of the day seeking much colder temps. Dropping this minimum temperature to 66 would adversely affect outfitters and guides, in that it forces us to operate during very early hours when the water is still too cold for decent fishing, and we have to be done right when the river is finally waking up. I'm happy to do that when we really need to as is right for the river, but I feel that 66° is unnecessary to pull all fishermen off the river at 2 o'clock.

Jed Fitzpatrick/Outfitter #8392  
Bitterroot River Guides  
Hamilton, Montana

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## #5

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, July 21, 2022 9:31:46 AM  
**Last Modified:** Thursday, July 21, 2022 9:39:21 AM  
**Time Spent:** 00:07:35  
**IP Address:** 161.7.121.87

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Page 1

### Q1

Contact information:

**Name:** Lawrence Urban  
**City/Town:** Helena  
**State/Province:** MT  
**Email Address:** Lurban@mt.gov

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### Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I am fully supportive that there should be different criteria for placing hoot-owl restrictions on cutthroat trout streams and rivers. Having fished in Montana for over 30 years, it is critical that we protect our native trout species. These native trout generally have lower tolerances to high water temperatures, and I have personally observed many dead cutthroat trout that have succumbed due to fishing pressure in water temperatures between 65 and 70 degrees. The placement of closures to protect these valuable native fish is important to future generations of Montanans. Please approve these measures.

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## #6

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, July 21, 2022 12:47:41 PM  
**Last Modified:** Thursday, July 21, 2022 12:58:01 PM  
**Time Spent:** 00:10:20  
**IP Address:** 184.166.65.21

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Page 1

### Q1

Contact information:

**Name:** Brian Connelly  
**City/Town:** Missoula  
**State/Province:** MT  
**Email Address:** allhourspainting@gmail.com

---

### Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

The change from September 15 to August 31st as a date to reopen streams is without a basis in reality. Stream temperatures don't drop at the end of August and with the warming that our state has experienced in the past few years, hot weather extends through Labor Day weekend most years. Our summers are getting longer and drought is becoming more frequent. Only the criteria related to water temperature, dissolved oxygen, and water flow should be used. The fish could care less what a calendar says. Let's make decisions based on science, not on vacation days.

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# #7

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, July 22, 2022 1:45:08 PM  
**Last Modified:** Friday, July 22, 2022 1:49:55 PM  
**Time Spent:** 00:04:47  
**IP Address:** 216.129.235.171

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Page 1

## Q1

Contact information:

Name: **Terry L. Quirk**  
City/Town: **Ennis**  
State/Province: **MT**  
Email Address: **tquirk4555@gmail.com**

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

FWP Commisioners,

Thank you for the opportunity to comment on this proposal. I support the changes proposed for ARM 12.5.507 and 12.5.508 and the Hoot Owl system designed to protect native cutthroat trout, with the exception of shortening the Hoot Owl season from September 15 to August 31. As temperatures continue to exceed normal values, I believe a September 15 date will continue to best protect our fisheries. I oppose shortening the season at this time. Thank you in advance for your consideration.

I'm in agreement with this statement prepared by TU.

Terry L. Quirk  
Ennis, MT

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# #8

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, July 25, 2022 9:13:24 AM  
**Last Modified:** Monday, July 25, 2022 9:18:43 AM  
**Time Spent:** 00:05:19  
**IP Address:** 174.45.73.245

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Page 1

## Q1

Contact information:

Name:	<b>Ben Lightle</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>benlightle@gmail.com</b>

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

100% agree to making it easier for fisheries managers to implement closures when needed. Also request that more info about the effect of warm/low waters be placed at fishing access sites. I'm baffled by the number of anglers who don't seem aware that high temps and low dissolved oxygen levels contribute to fish mortality.

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# #9

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, July 26, 2022 9:06:13 PM  
**Last Modified:** Tuesday, July 26, 2022 9:07:42 PM  
**Time Spent:** 00:01:28  
**IP Address:** 72.174.72.46

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Page 1

## Q1

Contact information:

Name:	<b>Mark ozog</b>
City/Town:	<b>great falls</b>
State/Province:	<b>MT</b>
Email Address:	<b>ozogmark@Gmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support a 66 degree Fahrenheit hoot owl trigger for cutthroat fisheries.

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# #10

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, July 27, 2022 5:23:53 PM  
**Last Modified:** Wednesday, July 27, 2022 5:26:33 PM  
**Time Spent:** 00:02:39  
**IP Address:** 174.247.154.107

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Page 1

## Q1

Contact information:

**Name:** Robert Gotshall  
**City/Town:** west yellowstone  
**State/Province:** MT  
**Email Address:** bgotshall@hotmail.com

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I firmly believe a66 degree trigger is needed for cutthroat fisheries.

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# #11

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, July 28, 2022 9:17:03 AM  
**Last Modified:** Thursday, July 28, 2022 9:18:04 AM  
**Time Spent:** 00:01:00  
**IP Address:** 76.75.34.249

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Page 1

## Q1

Contact information:

**Name:** Richard Hafenfeld  
**City/Town:** Sheridan  
**State/Province:** MT  
**Email Address:** hafenbates91@gmail.com

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support the hoot owl trigger of 66 degrees for cutthroat

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# #12

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, July 29, 2022 7:28:33 AM  
**Last Modified:** Friday, July 29, 2022 7:32:37 AM  
**Time Spent:** 00:04:04  
**IP Address:** 185.209.177.186

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Page 1

## Q1

Contact information:

Name:	<b>Kim Fawcett</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>kimberlyfawcett@hotmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support the proposal to amend angling restriction and fishing closure administrative rules, 12.6.507 and 12.5.508. I think our fisheries are already struggling and we should do everything we can to support the fish we love. We know trout are stressed at high temps so let's do right by them. Kim Fawcett

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# #13

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, July 29, 2022 8:50:49 AM  
**Last Modified:** Friday, July 29, 2022 8:58:17 AM  
**Time Spent:** 00:07:28  
**IP Address:** 46.44.202.22

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Page 1

## Q1

Contact information:

Name:	<b>Sam Mothner</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>sammothner@gmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

As a fly fishing guide I see first hand the impacts of water temperature on trout species. At 70 degrees, any fish caught dies regardless of my best efforts to revive and recover the fish. Hoot owl restrictions should be implemented at 3 days of water temp at 69 degrees or one day of 71 or higher.

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# #14

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Friday, July 29, 2022 9:33:02 AM  
**Time Spent:** 00:01:17  
**IP Address:** 97.121.216.198

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Page 1

## Q1

Contact information:

Name:	<b>Zachary W Allen</b>
City/Town:	<b>Gardiner</b>
State/Province:	<b>MT</b>
Email Address:	<b>icyclewithcoffee@gmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support the 66° Hoot Owl trigger for cutthroat fisheries.

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# #15

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, July 29, 2022 5:42:12 PM  
**Last Modified:** Friday, July 29, 2022 5:47:54 PM  
**Time Spent:** 00:05:41  
**IP Address:** 63.153.64.234

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Page 1

## Q1

Contact information:

Name:	<b>Mike Munck</b>
City/Town:	<b>Helena</b>
State/Province:	<b>MT</b>
Email Address:	<b>gratefulmunck@gmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Absolutely implement the lower water temp thresholds as in the ARM Rule. Only more critical to preserve what we have as population increase and global warming both increase.

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# #16

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Friday, July 29, 2022 9:50:20 PM  
**Time Spent:** 00:05:01  
**IP Address:** 162.142.28.95

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Page 1

## Q1

Contact information:

Name:	<b>John Baskin</b>
City/Town:	<b>Lewiston</b>
State/Province:	<b>ID</b>
Email Address:	<b>jmbaskin57@gmail.comjy</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Please consider adopting the 66 degree hoot owl trigger for cutthroat.

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# #17

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Saturday, July 30, 2022 6:15:14 PM  
**Last Modified:** Saturday, July 30, 2022 6:19:29 PM  
**Time Spent:** 00:04:14  
**IP Address:** 64.79.35.38

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Page 1

## Q1

Contact information:

Name:	<b>Mark Momberg</b>
City/Town:	<b>Bozeman</b>
State/Province:	<b>MT</b>
Email Address:	<b>mmomberg@aol.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Dear Montana Fish and Wildlife Commission,

I support the separate hoot owl restriction for cutthroat water bodies. It's reasonable, it's based on known science. Additionally, cutthroat trout are in a precarious position of reduced river flows, warmer water temperatures and a host of other factors challenging their survival.

Thank you for this opportunity,

Mark Momberg

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# #18

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, July 31, 2022 9:59:03 AM  
**Last Modified:** Sunday, July 31, 2022 10:11:48 AM  
**Time Spent:** 00:12:45  
**IP Address:** 174.215.19.205

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Page 1

## Q1

Contact information:

**Name:** Tom Jones  
**City/Town:** Troy  
**State/Province:** MT  
**Email Address:** tajones2622@gmail.com

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support lowering the temperature to 66 degrees for the cutthroat trout hoot owl trigger.

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# #19

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, July 31, 2022 1:27:42 PM  
**Last Modified:** Sunday, July 31, 2022 1:32:42 PM  
**Time Spent:** 00:04:59  
**IP Address:** 70.33.19.161

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Page 1

## Q1

Contact information:

**Name:** John S Butler  
**City/Town:** Cameron  
**State/Province:** MT  
**Email Address:** [steve.butler406@gmail.com](mailto:steve.butler406@gmail.com)

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Let's save our cutthroat fishing rivers, I think hoot-owl should be lower on rivers like the Madison, it's already over 70 degrees for 4 days at the Varney access, and getting warmer up stream, even though, the boats keep coming down every day!

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# #20

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 01, 2022 1:06:13 PM  
**Last Modified:** Monday, August 01, 2022 1:33:59 PM  
**Time Spent:** 00:27:45  
**IP Address:** 184.166.72.12

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Page 1

## Q1

Contact information:

Name:	<b>KynsLee Scott</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>ksguideservice@gmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I strongly agree with both proposal changes as it would benefit the health of the fisheries.

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# #21

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 01, 2022 1:49:25 PM  
**Last Modified:** Monday, August 01, 2022 1:49:29 PM  
**Time Spent:** 00:00:04  
**IP Address:** 184.166.72.12

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Page 1

## Q1

Contact information:

**Name:** KynsLee Scott  
**City/Town:** Missoula  
**State/Province:** MT  
**Email Address:** ksguideservice@gmail.com

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I strongly agree with both proposal changes as it would benefit the health of the fisheries.

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## #22

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 01, 2022 3:32:16 PM  
**Last Modified:** Monday, August 01, 2022 3:36:47 PM  
**Time Spent:** 00:04:31  
**IP Address:** 38.141.44.1

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Page 1

### Q1

Contact information:

**Name:** Steve Davis  
**City/Town:** Hamilton  
**State/Province:** MT  
**Email Address:** sapphire@bitterrootcasters.com

---

### Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

If you go to 66 degree temperature threshold it will impact angling crowds and force more boaters into fewer fishable stretches - resulting in greater fish mortality in fishable stretches. Cutthroat would be better protected going to barbless hooks and artificial flies/lures only in cutt water.

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# #23

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, August 02, 2022 8:30:45 AM  
**Last Modified:** Tuesday, August 02, 2022 8:46:13 AM  
**Time Spent:** 00:15:27  
**IP Address:** 69.145.20.164

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Page 1

## Q1

Contact information:

**Name:** Jenny West  
**City/Town:** Hamilton  
**State/Province:** MT  
**Email Address:** jennywest30@yahoo.com

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I am totally for protecting the cutthroat trout. I have guided on the Upper Bitterroot River for 20 years. I do feel that more data needs to be collected on this issue. Has FWP looked at mort counts on other cutthroat streams such as Rock Creek and Blackfoot Rivers? We should also at making these cutthroat streams single-hook barbless, not bait. So many times I see the spin fisherman out on the river with a barbed hooks with a worm. That does way more damage to the trout!

Thank you,  
Jenny West

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# #24

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, August 02, 2022 1:07:13 PM  
**Last Modified:** Tuesday, August 02, 2022 1:18:38 PM  
**Time Spent:** 00:11:24  
**IP Address:** 108.174.125.178

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Page 1

## Q1

Contact information:

**Name:** Sean OBrien  
**City/Town:** Hamilton  
**State/Province:** MT  
**Email Address:** [ospreyoutfitters@yahoo.com](mailto:ospreyoutfitters@yahoo.com)

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

While I applaud FWP for changing the ridiculous 74 degree parameter, I feel that the new 66 degree mark swings too far the other way. I have been a fishing guide for 23 years. In my experience, I start to see dead whitefish and cutthroat at 68 degrees. I am all for protecting the resource and I always self impose "hoot owl" restrictions (including this year) on my clients when I start seeing 68 degree water temp. I believe that if FWP closed the water at 66 degrees it would tremendously limit but the public and commercial fishing opportunity. I would ask if you would consider the 68 degree mark. Thank you

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# #25

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, August 03, 2022 6:15:12 PM  
**Last Modified:** Wednesday, August 03, 2022 6:21:12 PM  
**Time Spent:** 00:05:59  
**IP Address:** 216.47.49.225

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Page 1

## Q1

Contact information:

**Name:** Blackfoot Angler & Supplies  
**City/Town:** Ovando  
**State/Province:** MT  
**Email Address:** angler@blackfoot.net

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

We support lowering the temperature threshold for native trout along the Blackfoot River drainage. As a business along this river, we are willing to sacrifice profits during the hot months rather than watch the fishery decline due to heat or fishing pressure. We are here for the long haul.

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# #26

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, August 03, 2022 6:43:22 PM  
**Last Modified:** Wednesday, August 03, 2022 7:08:07 PM  
**Time Spent:** 00:24:44  
**IP Address:** 216.14.249.29

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Page 1

## Q1

Contact information:

Name: **Jerry OConnell**  
City/Town: **Greenough**  
State/Province: **MT**  
Email Address: **joconnell@blackfoot.net**

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Trout are at heightened mortality risk whenever the water temps exceed 68F degrees. Three consecutive days with high temps above 68 should trigger Hoot Owl, and three consecutive days above 71 should trigger total closure. Three consecutive days with temps staying at or below 68 should turn off those restrictions.

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# #27

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, August 03, 2022 8:32:01 PM  
**Last Modified:** Wednesday, August 03, 2022 9:12:23 PM  
**Time Spent:** 00:40:22  
**IP Address:** 69.145.147.98

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Page 1

## Q1

Contact information:

Name:	<b>Michele Puiggari</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>michele@mpuiggari.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

This is a great rule. We have so many more people here and need to protect the habitat and all the species

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# #28

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, August 03, 2022 11:23:26 PM  
**Last Modified:** Wednesday, August 03, 2022 11:37:54 PM  
**Time Spent:** 00:14:28  
**IP Address:** 70.33.39.247

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Page 1

## Q1

Contact information:

**Name:** Darin R Dewey  
**City/Town:** Lincoln  
**State/Province:** MT  
**Email Address:** darindewey@gmail.com

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I believe the 73 degree threshold for the hoot owl restriction is too high and it should be lowered to 68 degrees for all species. We need to prioritize conservation above convenience. If you love your hobby, protect it.

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# #29

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, August 04, 2022 10:19:33 AM  
**Last Modified:** Thursday, August 04, 2022 10:24:09 AM  
**Time Spent:** 00:04:36  
**IP Address:** 174.231.65.237

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Page 1

## Q1

Contact information:

**Name:** Andrea Morgan  
**City/Town:** Ovando  
**State/Province:** MT  
**Email Address:** amorgan@blackfoot.net

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Please lower the temp threshold to initiate Hoot Owl restrictions for the Blackfoot River. We are seeing significant fishing pressure on the Blackfoot, and North Fork Blackfoot due to other rivers being under Hoot Owl restrictions. Our water temps are stressing the fisheries, as is the increased angling pressure. I've witnessed anglers hammering fishing holes in 100 degree (air) temps between 3pm and 6:30 pm in the last several days. I encourage you to increase restrictions in order to conserve this economically valuable and crucial wildlife resource. Thanks for your time,  
Andrea Morgan

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# #30

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, August 04, 2022 11:53:51 AM  
**Last Modified:** Thursday, August 04, 2022 12:08:57 PM  
**Time Spent:** 00:15:06  
**IP Address:** 69.145.41.23

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Page 1

## Q1

Contact information:

Name:	<b>Sharon Butterfield</b>
City/Town:	<b>Whitefish</b>
State/Province:	<b>MT</b>
Email Address:	<b>flywaters2@yahoo.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I agree water temps should be NO higher than 70. I am an avid fly angler and personally, I would like to see the temps dropped to 65 degrees in all Montana rivers and streams. There is enough scientific evidence that temps 65 degrees and higher trout begin to stress. Given that body of evidence, why would we allow fishing in temps 70 degrees and higher???? The fish are already starting to stress at 65 degrees...higher temps, more stress...add getting caught by an angler and you have an extremely stressed fish in 70 plus degree water. Let's treat our fish like the valuable resource they are instead of stressing the fish to cater to the angler.

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# #31

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, August 04, 2022 2:24:49 PM  
**Last Modified:** Thursday, August 04, 2022 2:32:17 PM  
**Time Spent:** 00:07:27  
**IP Address:** 12.27.214.123

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Page 1

## Q1

Contact information:

**Name:** Steve Shirley  
**City/Town:** Liberty Lake  
**State/Province:** WA  
**Email Address:** spiritdoc007@gmail.com

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I encourage you to place Hoot Owl restrictions now on the Blackfoot river and do so earlier in the season in the future. The water temperature has already been documented as above the healthy threshold for trout viability and is even worse on the North Fork. I have fished these rivers for the past 15 years and a spend a sizable amount of my fishing budget there each year. While Hoot Owl restrictions would shorten my time on the water, I am very interested in long term survivability of the mostly Wester Cutthroat that live there. Thanks for your consideration.

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# #32

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, August 04, 2022 11:10:03 PM  
**Last Modified:** Thursday, August 04, 2022 11:14:05 PM  
**Time Spent:** 00:04:01  
**IP Address:** 207.183.189.193

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## Q1

Contact information:

Name:	<b>Michael Bias</b>
City/Town:	<b>Twin Bridges</b>
State/Province:	<b>MT</b>
Email Address:	<b>mikebias@3rivers.net</b>

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**Q2**

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

4 August 2022

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

Dear Commissioners and Director Worsech:

On behalf of the board of directors and over 1,000 professionally-licensed guide and outfitter members of the Fishing Outfitters Association of Montana (FOAM), I am writing to express our concern regarding the proposed amendment to the Administrative Rules of Montana (ARM) 12.5.507 and 12.5.508 pertaining to angling restriction and fishing closure criteria. We have reviewed the proposal and have worked closely with the staff in the Fisheries Division of Montana Fish, Wildlife, and Parks (FWP).

After review of the proposed amendment to ARM offered by the Department, we summarized our feedback into these major issues:

Angling Restriction and Fishing Closure amendments to create a cutthroat specific temperature criterion, new language in 12.5.507(1)(b)(ii):

FOAM supports the idea of the creation of a new criterion for cutthroat streams in the ARM, and to the existing defining and clarification of 60 degrees for bull trout streams. However, we are concerned over the 66-degree criteria for cutthroat streams without corresponding identification of those stream reaches and definition of how 'cutthroat streams' are defined (e.g., are they reaches where some percentage of the total trout population are composed of cutthroat? If so, what percentage). Further, with limited availability of temperature stream gauges across the state, we are concerned what stream gauges will be used to assess angling restriction criteria on particular streams. For example, if the East Fork or West Fork of the Bitterroot River were determined to be cutthroat streams, would the stream gauge at Darby, nearly 5 miles downstream from the confluence of both forks of the Bitterroot, be used to evaluate the water temperatures on the East or West forks?

We continue to support the 60-degree threshold for bull trout streams that have a demonstrated even greater sensitivity to warmer water temperatures.

FOAM supports continuing the existing criterion of 73 degrees in 12.5.507(1)(b)(i) for nonnative salmonid streams that has been in place for years, along with the additional discretion offered to FWP to enact the restrictions and closures that are outlined in this proposal. The most important criterion is to have protections in place when the conditions outlined in the ARM are met. We support maintaining 73 degrees for nonnative salmonids because the science supports that as an adequate protection for these species when the restrictions are implemented.

Reopening waters issues, amendments to 12.5.508:

Change of date from September 15 to August 31 in 12.5.508(1):

FOAM does not support this change because under the angling restriction criteria and corresponding lifting of restrictions, restrictions can be implemented or lifted regardless of the date.

We support maintaining the reopening criteria for nonnative salmonid streams at 70 degrees for three consecutive days.

Clear articulation of flexibility language around lifting restrictions or closures, new language in 12.5.508(5):

## Drought ARM Rules

FOAM supports the inclusion of this language that provides clear discretion to FWP for delaying reopening waters that are subject to restriction or closure. The clarifying language also provides greater certainty to the angling public to the reasons that restrictions or closures may persist beyond the reading on a temperature gauge. We also strongly support allowing the biologists to assess the conditions related to habitat security for fish from issues beyond a water temperatures as well as potential for spillover impacts from restrictions on other adjacent waterbodies that may increase angling pressure (i.e., angler displacement from regulation).

Use of Statewide Fisheries Management Plan (Plan) in criteria determination, new language in 12.5.507(1)(b)(i-iii):

FOAM supports the use of the Plan in determining which waterbodies will be deemed nonnative salmonid, cutthroat, and bull trout priority streams. The Plan should clearly and thoroughly define the specific streams and reaches that are subject to each criterion in this ARM. For example, even though there has been a specific criterion for bull trout in the ARM, the ARM has not been implemented because there is no clearly identified streams or reaches of streams that are identified for bull trout. Creation of these new angling restriction criteria will only be as effective as to the extent of the identification of streams and reaches in the Plan encompasses an honest assessment of which waterbodies are subject to which criterion.

Shift “other biological or environmental conditions” standard to 12.5.507(1) from (2):

FOAM supports the shift of this language to 12.5.507(1) from (2) because it makes these types of conditions eligible for use to meet the criteria for implementing fishing restrictions and closures, not just the latter. The new language in 12.5.507(2)(a) now allows for when the “conditions of (1) develop or degrade” that a fishing closure, beyond just a restriction, is eligible. This is a positive change as we see a variety of potentially adverse conditions developing that may cause stress to our fisheries that necessitate angling restrictions and closures, beyond water temperature or flow.

To conclude, FOAM supports the idea of the creation of a new criterion for cutthroat streams and to the existing defining and clarification of 60 degrees for bull trout streams. However, we are concerned over the 66-degree criteria for cutthroat streams without corresponding identification of those stream reaches and definition of how ‘cutthroat streams’ are defined and the identification of what stream temperature gauge will be used for each reach.

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 [mike@foam-mt.org](mailto:mike@foam-mt.org) or by phone at 406-925-2276). Again, we thank you for the opportunity to provide public comment on this important topic.

Respectfully,

Michael A. Bias, Ph.D.  
Executive Director  
Fishing Outfitters Association of Montana

# #33

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 05, 2022 8:14:27 AM  
**Last Modified:** Friday, August 05, 2022 8:18:43 AM  
**Time Spent:** 00:04:16  
**IP Address:** 72.197.198.210

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Page 1

## Q1

Contact information:

Name:	<b>Jim Kralovec</b>
City/Town:	<b>Corvallis</b>
State/Province:	<b>MT</b>
Email Address:	<b>jkralovec@gmx.com</b>

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support a 66° F hoot owl trigger on MT rivers for cutthroat fisheries. The current trigger is too high! Thank you.

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# #34

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 05, 2022 9:15:05 AM  
**Last Modified:** Friday, August 05, 2022 9:17:55 AM  
**Time Spent:** 00:02:50  
**IP Address:** 66.109.157.117

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Page 1

## Q1

Contact information:

Name:	<b>Deb</b>
City/Town:	<b>Ovando</b>
State/Province:	<b>MT</b>
Email Address:	<b>dillree@blackfoot.net</b>

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Please amend!! Guides don't care and the Blackfoot river needs your help!

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#35

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 05, 2022 12:13:42 PM  
**Last Modified:** Friday, August 05, 2022 12:15:28 PM  
**Time Spent:** 00:01:45  
**IP Address:** 174.45.228.92

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Page 1

**Q1**

Contact information:

Name: **Joe Roberts**  
City/Town: **Billings**  
Email Address: **joecroberts7@gmail.com**

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**Q2**

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

Support for 66 degree fishing hoot owl for Cutthroats

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# #36

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 05, 2022 3:45:01 PM  
**Last Modified:** Friday, August 05, 2022 3:48:03 PM  
**Time Spent:** 00:03:01  
**IP Address:** 69.145.209.118

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## Q1

Contact information:

Name:	<b>Nancy Arnold</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>montananancy54@gmail.com</b>

---

## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support implementing hoot owl hours for cutthroat fisheries when the water temperature hits 66 degrees F.

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# #37

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 05, 2022 4:06:23 PM  
**Last Modified:** Friday, August 05, 2022 4:09:03 PM  
**Time Spent:** 00:02:40  
**IP Address:** 69.145.209.118

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Page 1

## Q1

Contact information:

Name:	<b>Stephen LaRsnce</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>sclarance@outlook.com</b>

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## Q2

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I support the proposal to start hoot owl hours for cutthroat fisheries when the water temperature reaches 66F.

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#38

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Saturday, August 06, 2022 8:07:07 PM  
**Last Modified:** Saturday, August 06, 2022 8:11:59 PM  
**Time Spent:** 00:04:52  
**IP Address:** 69.145.22.162

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Page 1

**Q1**

Contact information:

Name:	<b>Paul Gilbertson</b>
City/Town:	<b>Hamilton</b>
State/Province:	<b>MT</b>
Email Address:	<b>irpabkind@outlook.com</b>

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**Q2**

Please provide comment on the proposal to Amend Angling Restriction and Fishing Closure Administrative Rules, 12.5.507 and 12.5.508.

I would like the cut off temp to be 68 degrees. If waters get low enough to stress fish. Closures should be implemented. Thank you.

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