



October 31, 2024

Montana Trout Unlimited  
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Montana Department of Fish, Wildlife, and Parks  
ATTN: Fish and Wildlife Commission  
P.O. Box 200701  
Helena, Montana 59620-0701

*Submitted via email to: FWComm@mt.gov*

**Re: Montana Trout Unlimited public comments on 2025-2025 Fishing Regulation Commissioner Amendments**

To Whom It May Concern:

Thank you for the opportunity to provide comments on the *2025-2026 Fishing Regulations Commissioner Amendments*. Please consider the comments in this letter as an addendum to our written public comments submitted on September 19, 2024. We greatly appreciate the opportunity to weigh in on the proposed amendments offered by Commissioners to the regulation packet ahead of the November 12<sup>th</sup> Commission meeting.

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 more than five thousand Trout Unlimited members and supporters. Several of our chapter leaders and local members helped inform the comments on the proposed changes that are found below.

Montana Trout Unlimited offers our support for the following commissioner amendments to the *2025-2026 Fishing Regulation Public DRAFT Proposals*:

- *Tabor - Region 1 amendments concerning bull trout (Big Salmon Creek, Big Salmon Lake, Hungry Horse, and South Fork of the Flathead River):* MTU strongly supports these four amendments offered by Commissioner Tabor on behalf of the Department with regard to bull trout angling in Region 1. With the declining redd counts this fall, these changes are protective and necessary to reduce further harm to struggling bull trout populations in the drainage. We strongly supported building in adaptive management proposals into the Statewide Fisheries

Management Plan adopted by the Department, and these amendments to the regulations are the implementation of that well vetted strategy. These changes are not coming out of the blue and MTU believes that they are a strategy to balance the interests of species conservation and recovery with the angling community.

- *Tabor - Western district amendment with respect to spearfishing, northern pike:* MTU supports all efforts to combat illegally introduced, non-native species that are having a detrimental impact to native populations within the Western District. While we do not have an opinion on underwater spearfishing specifically, we support whatever methods make the reduction or elimination of northern pike populations in western Montana more possible. Moving forward we will continue to push for both expanded angling opportunities for northern pike as well as pursuing mandatory catch and harvest regulations.
- *Walsh – Definition of a hook:* MTU supports this amendment to the hook proposal (#1) because it makes clear that multiple single hooks on one line still are considered a single hook on a shank. The intent of the proposal defining a hook was never to include a fly angler using two separate hooks on a single line, such as a dry fly and dropper or articulated streamer, and this proposal clarifies that proposal. This amendment provides greater clarity to the regulation.

Montana Trout Unlimited is neutral on the following commissioner amendments as drafted to the *2025-2026 Fishing Regulation Public Scoping Proposals*:

- *Walsh – Central and Western Fishing District Daily and Possession Limits for Combined Trout in Rivers/Streams:* First of all, we can state that we appreciate the intent of Commissioner Walsh in bringing this amendment to the Commission. It is a necessary conversation to have regarding the combined trout limits for both districts, especially given the increasing pressures on our coldwater rivers and streams. In the broader conversation concerning the balance of wild trout management in our streams and rivers, harvest limits are one component along with the primary driver of habitat. At this time however, we are neutral on the proposal to change harvest limits in the Western and Central Districts for two reasons. First, we believe strongly that this conversation should be supported by actual data on fishing pressure and harvest that is currently occurring on rivers and streams. If we believe that overharvest is, or could be a problem, we should be making scientific decisions driven by the actual data on our fisheries. Foundational to that is a robust involvement with the fisheries biologists in these regions. To date, we have seen no data that makes a compelling argument in favor of a change being needed, and there has not been robust grassroots involvement with the science professionals managing our rivers. Second, we think that this proposal merits further and broader discussion amongst the angling community to refine and inform the decisions. Over the course of the last three years, the angling community along with the Department has completed rigorous planning and regulation setting processes where stakeholders and biologists, along with the public, have had a chance to discuss and debate numerous proposals. At no point in those processes was this amendment or anything similar discussed, which we think makes the proposal less well informed and supported by a broad section of the angling community and public. With additional data and diverse perspectives, we believe that the Commission can make a more informed decision regarding this amendment. Again, we appreciate the intent of

the proposal and look forward to having a continued discussion, supported by scientific data, with the Department and Commission on this proposal.

- *Tabor – Lake whitefish exception from Flathead Lake:* We do not have any concerns with the proposed amendment requested by the Department.

Please do not hesitate to contact us with any questions or if you need additional information regarding the comments that we have submitted (via email at [clayton@montanatu.org](mailto:clayton@montanatu.org) 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 Fisheries Division to make these changes.

Respectfully,



David Brooks  
Executive Director  
Montana Trout Unlimited



Clayton Elliott  
Conservation Director  
Montana Trout Unlimited