

MONTANA OUTFITTERS & GUIDES ASSOCIATION

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October 22nd, 2024

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

Subject: Support for Spearfishing Amendment 2025-2026 Fishing Regulations

Dear Members of the Montana Fish, Wildlife, and Parks Commission,

I am writing on behalf of the Montana Outfitters and Guides Association (MOGA), representing over 500 members who are deeply invested in the health and sustainability of Montana's fisheries. We appreciate the opportunity to comment on the proposed amendment of fishing regulations for the 2025-2026 period.

Support for Specific Changes:

• Spearfishing in the Western District: We endorse Commissioner Tabor's proposed amendment allowing spearfishing for Northern Pike in the Western District.

Rationale and Background:

- Ecological Impact: Studies on invasive species management, such as those by Lodge et al. (2006) in "Biological Invasions: Recommendations for U.S. Policy and Management," emphasize the importance of active management strategies for invasive species like Northern Pike. Allowing spearfishing can serve as an effective method for controlling invasive populations, reducing their impact on native species through direct removal (Zale et al., 2018, "Control of Invasive Fishes").
- User Conflict and Management: Research by Beardmore et al. (2011) in "Social-Ecological Fit in Recreational Fisheries: Insights from the Governance of Three Case Studies" suggests that while user conflicts can arise, proper zoning and temporal restrictions can mitigate these issues, ensuring coexistence of different fishing methods.
- Regulatory Precedence: Other states have successfully implemented spearfishing regulations for invasive species management. For example, Florida's spearfishing regulations for lionfish have been effective in controlling this invasive species while promoting tourism and education (Florida Fish and Wildlife Conservation Commission, 2020).
- Socio-Economic Benefits: There is growing evidence that recreational fishing, including spearfishing, can provide both economic benefits through tourism and gear sales, and social benefits by enhancing community engagement with natural resources (Arlinghaus

et al., 2007, "Understanding the Complexity of Recreational Fishery Systems"). This amendment could not only control invasive species but also boost local economies.

Recommendation:

We urge the Commission to adopt the proposed regulations as outlined by FWP, including the public proposals, and specifically endorse the amendment to allow spearfishing of Northern Pike in the Western District.

Additional Points to Consider:

- Safety and Education: Implementing spearfishing might require an educational program
 or guidelines to ensure public safety and conservation ethics among participants. MOGA
 is prepared to collaborate with FWP in developing these resources.
- Monitoring and Review: We suggest including a review period to assess the impact of the spearfishing amendment on both the pike population and other fish species, as well as on local fishing practices. This will allow for adjustments if necessary, ensuring the regulation's effectiveness.
- Public Opposition and Balance: We acknowledge that there might be concerns from traditional anglers regarding the introduction of spearfishing. Addressing these through education on the benefits of invasive species control and clear regulations on where and when spearfishing is allowed can mitigate these concerns.

Thank you for considering our support for these crucial regulations. We look forward to ongoing collaboration with FWP to manage our state's natural resources responsibly. We would also welcome the opportunity to discuss these recommendations in more detail at your convenience.

Sincerely,

Will Israel

Executive Director

Montana Outfitters & Guides Association

References:

- Lodge, D. M., et al. (2006). "Biological Invasions: Recommendations for U.S. Policy and Management." Ecological Applications, 16(6), 2035-2054.
- Zale, A. V., et al. (2018). "Control of Invasive Fishes." Fisheries, 43(5), 202-213.
- o Arlinghaus, R., et al. (2007). "Understanding the Complexity of Recreational Fishery Systems." Fisheries Research, 87(2-3), 143-155.