

Subject: Opposition to Proposed Amendment on Hook Definition in 2025-2026 Fishing Regulations

October 31, 2024

Dear Commissioner Walsh and Members of the Fish and Wildlife Commission,

The Montana Wildlife Federation (MWF) is writing to express our opposition to the proposed amendment to redefine a "single hook" by removing the statement that "a lure with multiple hooks is still considered a single hook." After reviewing this proposal, MWF does not see a biological justification or any request from Montana Fish, Wildlife & Parks (FWP) biologists indicating a need for this regulatory change. We note that multi-hook lures, commonly known as treble hooks, pose a higher risk of injury and mortality to the fish if the fish is meant to be released.

Our organization is committed to ensuring that Montana's streams and fisheries remain healthy and resilient. We believe this can be achieved under the current regulations, which balance the needs of diverse fish species without unnecessary restrictions on angler practices. It is essential to protect our hunting and fishing heritage, including the legal keep of fish where population data show healthy, sustainable levels.

This amendment has implications statewide for several fish species beyond native trout, including those that have not demonstrated population struggles or conservation concerns under the existing regulations. FWP's own response to the amendment notes the potential impact on fisheries that do not currently face biological issues. Given that FWP anticipates no population-level benefits from the amendment, MWF does not see a reason to alter the longstanding practices that serve Montana anglers.

We ask the Commission to consider these points and to continue supporting scientifically informed fishery management strategies. By maintaining the current definition of "single hook," the Commission can uphold both the health of Montana's fisheries and the fishing opportunities that residents and visitors alike enjoy.

Thank you for considering our perspective, and please feel free to reach out to Garrett Titus, MWF Conservation Policy Specialist, garrett@mtwf.org, or I should you wish to discuss this further.

Sincerely,

Christopher Servheen

Christopher Servheen, Ph.D. President and Board Chair Montana Wildlife Federation