

MONTANA AUDUBON

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April 9, 2010

MO River Reservoir Management Plan
Montana Fish, Wildlife & Parks
P.O. Box 200701
Helena, MT 59620-0701

Dear Fisheries Division,

Please accept the following comments on behalf of Montana Audubon on the tentatively approved *Upper Missouri River Reservoir Fisheries Management Plan 2010-2019 (UMRRFM Plan)*.

Montana Audubon represents approximately 3,800 Audubon members in the state. Although our membership is diverse, there is a consistent deep concern for wildlife and wildlife habitat in the state. Protection and enhancement of Montana's aquatic ecosystems is a priority issue for Audubon in Montana. You may receive comments from other members in the Society.

The *UMRRFM Plan* will set the management direction and goals for the next 10 years on this important stretch of the Missouri River system. Because we are not an organization that focuses on fishing and recreation, our comments are more directed at maintaining the aquatic ecosystem. Although we believe the *UMRRFM Plan* contains some important recommendations, we also find some of its recommendations troubling.

Protection Measures Against Exotic Species

To begin, we support the following two specific provisions that will help maintain the aquatic ecosystem:

1. **Prohibition on the Use of Live Fish as Bait.** We support the *UMRRFM Plan's* goal to “[p]revent introduction of new fish species into the upper Missouri River reservoir system by continued prohibition of the use of live fish as bait.” We support a prohibition on the use of live bait in the Missouri River system. A prohibition is the best—and cheapest—way to prevent new species from being inadvertently introduced. Because some fishermen want to use live bait, an ongoing education would undoubtedly help educate these individuals.
2. **Prevent the Introduction of Disease and Aquatic Nuisance Species.** We support the *UMRRFM Plan's* goal to “[p]revent new diseases and exotic aquatic plant and wildlife species from entering the Canyon Ferry/Missouri River system and limit the expansion of current disease agents.” Of the 6 strategies identified to achieve this goal, we feel that conducting boat-checking

and having boat washing stations available during periods of exceptionally high angler use, including during fishing and boating tournaments, is critical.

Pelicans and Cormorants

Unlike the above two management goals, we find the following provision on American White Pelicans and Double-crested Cormorants troubling: “Consider active bird management strategies if research shows significant impacts to fish populations.” (pages E-10 and 39)

The management plan repeatedly draws attention to the fact that walleye are the most significant predators on trout and perch in Canyon Ferry Reservoir. This is supported in the *UMRRFM Plan* through the following quotes:

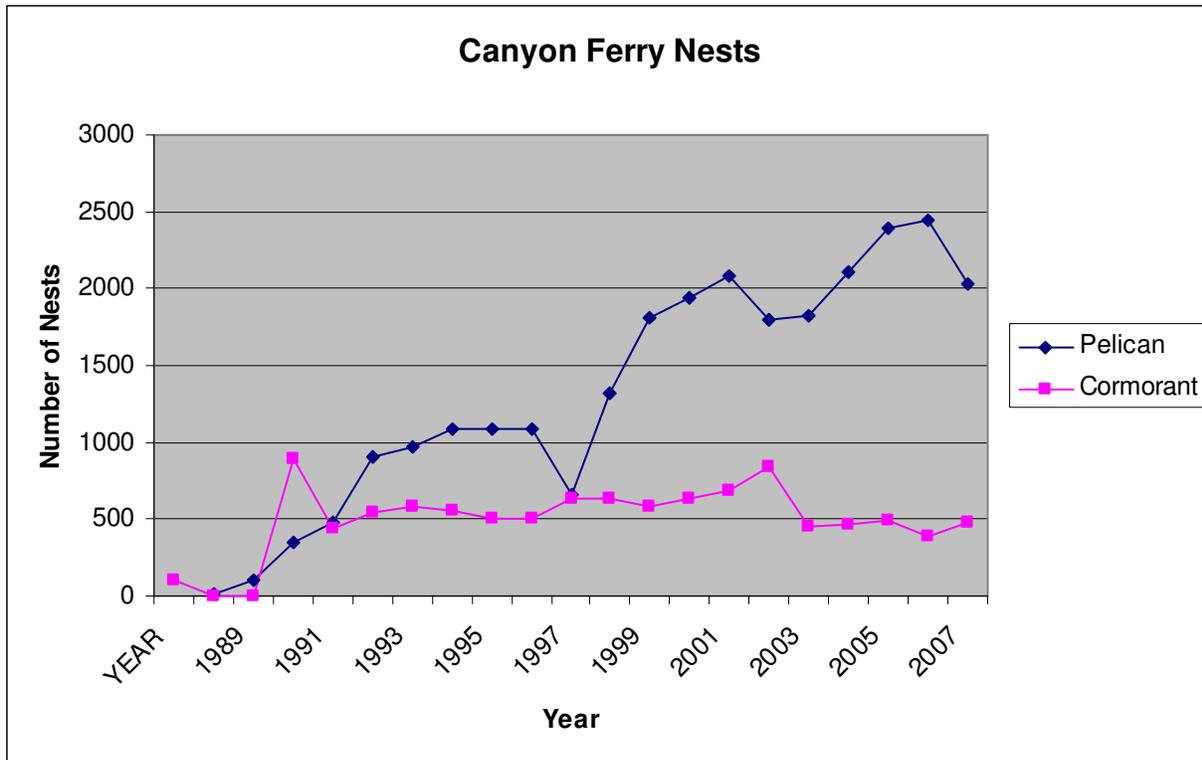
- “Walleye flushed from Canyon Ferry Reservoir into Hauser Reservoir is an issue that affects the balance of the multi-species fishery. Depending on annual year class strength and water year, the number of walleye flushed into Hauser Reservoir has the potential to be significant. Since the expansion of the Canyon Ferry walleye fishery, walleye relative abundance in Hauser has increased 1,700%, from an average abundance of 0.2 walleye per net (1986-1997) to an average of 3.6 walleye per net (1998-2008).” (page 45)
- “The current prey base in Hauser is not capable of supporting walleye abundance at current walleye population levels. Walleye population numbers should be decreased to meet prey availability. The stated objective of 2-3 walleye per sinking fall gillnet is based on recent gillnetting trends as well as the successful multi-species fishery that historically existed in Holter Reservoir prior to expansion of walleye in Canyon Ferry.” (page 48)
- “Walleye flushed from Canyon Ferry and Hauser Reservoirs into the Missouri River below Hauser Dam is an issue that influences the dynamics of the multi-species fishery.” (Page 58)
- “Increased walleye densities in Holter Reservoir and in the Missouri River will affect the balance of the multi-species fishery due to increased predation on trout, perch, and kokanee.” (Page 62)
- “Walleye flushed from Canyon Ferry and Hauser Reservoirs have impacted the balance of the multi-species fishery.” (Page 70)
- “Increased walleye densities in Holter Reservoir affect the balance of the multi-species fishery with increased predation on trout and yellow perch and potential negative effects on walleye growth rates. Walleye abundance remains at record high levels, adding to an already limited forage base in the reservoir.” (Page 76)
- In Canyon Ferry, “Declines in perch abundance are largely attributable to increased predation by walleye.” (Page E-9)
- In Canyon Ferry: “Stocking of larger sized rainbow trout is necessary to avoid predation by walleye.” (Page 27)
- For the Missouri River (Toston Dam to Canyon Ferry Reservoir): “Although trout are the primary sport fish sought by anglers in this river section, angler reports for walleye have increased in recent years. Continued expansion of walleye from the reservoir to the river could adversely affect rainbow and brown trout populations due to increased predation. Increased predation by walleye coupled with drought conditions could further limit the sport fishery from Toston to Canyon Ferry.” (Page 18)

- “The limited spawning habitat of rainbow trout and brown trout further impacts their poor reproductive success, and predation by walleye further reduces recruitment of successfully reared fish.” (Page 26)
- Response provided to public comment by FWP on Perch numbers: “Predation by walleye is likely more of a controlling factor to perch abundance than angler harvest.” (Pages B-6, B-9)
- “Although management alternatives for walleye in this new plan provide some strategies to improve size structure of the Canyon Ferry walleye population, active walleye management through high bag limits is still necessary to maintain the multi-species fishery by maintaining walleye population levels appropriate for available forage.” (page E-9)
- “By 2000, large year classes of walleye produced in 1996 and 1997 were large enough to effectively prey upon stocked rainbow fingerlings, and rainbow numbers declined in subsequent years.” (page 22)

The challenges associated with maintaining a multi-species fishery in an area where the non-native walleye has been introduced has been documented in numerous locations throughout the United States. This fact was perhaps best documented in the report by Tomas McMahon in 1992, *Potential impacts of the introduction of walleye to the fishery of canyon ferry reservoir and adjacent waters*, (Biology Dept., Montana State University, 59 pp). A few of the conclusions from this report include:

- “It is likely that walleye would compete for forage with the other piscivores present in Canyon Ferry, Namely, large yellow perch, brown trout, and burbot. Walleye population can reduce growth and survival of other piscivores if their population becomes large enough to reduce the forage base.” (page 31)
- “The pattern of changes after walleye introduction shown in Table 6 [from Seminoe Reservoir in Wyoming] has been repeated in a number of other cases. In Wyoming, heavy predation from introduction walleye led to the stocking of larger trout or elimination of the trout fishery” in the following reservoirs: Pathfinder, Keyhole, Alcova, and Glendo Reservoirs. “It is important to note that good populations of forage fishes existed in these reservoirs prior to the introduction of walleye. However, the forage base was not able to sustain heavy predation pressure in the presence of a large, self-sustaining walleye population.” (page 35)

Despite the documentation that walleye significantly impact the Canyon Ferry fishery, the *UMRRFM Plan* tries to implicate two bird species in the decline in fish. This conclusion does not seem reasonable; it is also NOT well supported by any background information in the *UMRRFM Plan*. While it is true that pelican and cormorant numbers have increased significantly since the 1990s (see chart below put together from bird census data), cormorant numbers have hovered around 1,000 birds since 1992 and pelican numbers appear to be stabilizing around 4,000 birds. These relatively low numbers, in comparison to the large walleye population, do not justify the conclusions drawn in the *UMRRFM Plan*.



While we have no problem having FWP study the diet of these two bird species, there is no Montana research that scientifically supports reductions in their numbers. Therefore, to include this recommendation in the *UMRRFM Plan* is unwarranted. In fact, to date, specific studies done on Canyon Ferry reveal that these birds eat the following fish:

- Pelicans have been documented to have approximately 90% of their diet as carp and crayfish; and
- Cormorants have been documented to eat the following percentages of different aquatic species: 44% stonecat, 13.2% trout, 13.2% suckers, 15.5% dace, 6.6% sculpins, and 7.7% crayfish.

To summarize Canyon Ferry-based studies, the diet of pelicans has been documented to contain insignificant numbers of trout, and the diet of cormorants has been documented to contain approximately 87% nongame fish and 13% game fish (trout).

In Montana, American White Pelicans are considered a Species of Concern (SOC). SOC are native species that are at-risk due to declining population trends, threats to their habitats, restricted distribution, and/or other factors. Pelicans declined in the mid-1900s because they were vulnerable to the spraying of DDT, endrin and other organochlorides in agriculture as well as widespread draining and pollution of wetlands. Montana has only five places in the state where pelicans breed: Medicine Lake National Wildlife Refuge (NWR), Bowdoin NWR, Benton Lake NWR, Aarod Lake, and Canyon Ferry Reservoir. We believe that this species needs to be protected. Double-crested Cormorants also deserve protection. Although they have no special conservation status in Montana, their numbers decreased significantly in the 1960s due to the effects of DDT.

It is probably impossible to tell how widespread cormorants and pelicans historically nested in Montana. However, their comeback (translated in the *UMRRFM Plan* as pelican populations that have “grown exponentially” and cormorant populations that have “steadily increased”) should perhaps be seen as a conservation success as these birds recover from dramatic decreases in their populations. Instead, some recreationists call for reduction in their numbers. It is much easier to blame changes in fish populations on highly visible birds, rather than to implicate predatory fish in the process.

We ask the *UMRRFM Plan* be science-based. We do not believe that the recommendation on pelicans and cormorants meets this test; therefore this recommendation should be removed. If studies are completed, they need to determine the significance of impact compared to the impact of walleye. And if these two species are vindicated, FWP should include in their management plan a program to educate fishermen about the importance of biodiversity and how it is important to “share” our fisheries with a couple of native bird species.

Improvements Since Draft Plan

Since the *Draft UMRRFM Plan*, the “tentatively approved” *UMRRFM Plan* has softened its language on pelican and cormorant control. While we appreciate this change, we request FWP consider making the following changes before the plan is finalized:

- If FWP continues to include the recommendation to “[c]onsider active bird management strategies if research shows significant impacts to fish populations,” we would recommend that any “impacts” be put in perspective. If an impact is called “significant,” it needs to be measured against all other impacts influencing fish populations, including the impact of predation by walleye. Comparing the impact of birds versus walleye in a manner that is scientifically defensible will be critical to the decision making about bird management.
- All studies conducted on cormorants and pelicans at Canyon Ferry should be paid for out of Fishery Division money and not use precious small nongame funding. That said, all study protocol needs to be reviewed and approved by the Wildlife Division within FWP. We would also ask that the data collected and protocols used be available to the public for full scrutiny.
- The *UMRRFM Plan* indicates that bird “population management measures will require an Environmental Assessment and provide opportunity for public comment.” We applaud the commitment to obtaining public comment on this decision. However, we specifically request that the term “Environmental Assessment” be replaced by “environmental review under the Montana Environmental Policy Act.” Stating that this decision will only result in an Environmental Assessment, and not a more thorough Environmental Impact Statement is a presumption FWP cannot make before going through an analysis. An environmental review includes both Environmental Assessment and Environmental Impact Statement.
- In deliberations about bird management strategies, we would like FWP to consider which species are native to the state of Montana. It is rare for FWP to control native wildlife in order to maintain non-native wildlife (wolves and coyotes come to mind, but their control is

focused on domestic livestock impacts). Tolerance and preference for native wildlife should outweigh only the most egregious “significant impacts to [non-native] fish populations.”

In conclusion, we believe the *UMRRFM Plan* contains some important recommendations, we also request (as detailed above) that specific changes be made to the portions of the plan related to pelicans and cormorants.

Thank you for the opportunity to comment on the *UMRRFM Plan*. Please contact me if you need clarification or have questions about these comments.

Sincerely,

A handwritten signature in black ink that reads "Janet H. Ellis". The signature is written in a cursive style with a large loop under the letter 'J'.

Janet H. Ellis, Program Director
<jellis@mtaudubon.org>