



Jim Vashro
Fisheries Manager
Montana FWP
490 N Meridian Road
Kalispell, MT 59901

September 5, 2005

Dear Mr. Vashro,

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. We have reviewed the Draft Environmental Assessment for Tiger Muskie Introduction and wish to submit the following comments.

Flathead Audubon Society does not support the proposed introduction of tiger muskies for reasons discussed below.

While the proposal does follow the 1997 management plan, it is likely that many conditions and expectations have changed since then. In the realm of planning, 8 years is a long time given the speed with which public opinion and emphasis change. Given the controversial nature of the proposal, and the long period of time since the management plan was prepared, we feel the Department should reevaluate the management plan in light of current public opinions, Department emphasis on native species, and sound aquatic ecosystem management.

Introduction of new species has a long history of adverse effects on native species and ecosystems. R1 of FWP has plenty of examples. There has been inadequate public input and debate on the wisdom of introducing new aquatic species given the past history of such introductions.

The tiger muskie proposal seems to be completely at odds with current FWP emphasis on native species. The native species emphasis has been especially true west of the divide. The species in Horseshoe Lake are native species but they just don't happen to be highly sought after "game" fish. The existing fish species are just fine for bald eagles and loons so there are only going to be detrimental effects to those species if more human activity is generated by having a "desirable" fish species present in the lake. The EA itself recognizes the problems for loons and eagles created by human activities. Potential "mitigation" described in the EA does not prevent the detrimental effects from surely happening.

Increasing fishing opportunity seems a very weak argument for introducing a new, non-native species. Northwest Montana with its abundance of water leads the state, if not much of the country, with fishing opportunities for many native and already established non-native species.

Predation of tiger muskies on loon chicks is a major concern for Flathead Audubon Society. Data presented in the EA does not allay our concern. Lack of reported loon chicks in esocid stomachs is not surprising and is not evidence that predation on chicks is not a serious problem

for loons. With only 1 or 2 chicks per pair the proportion of loon chicks to the total number of waterfowl and other riparian birds potentially available to esocid predation is so small that it is not reasonable to expect loon chicks to be found in small samples of fish stomachs.

Predation on boreal toads is a concern. Just because some boreal toads may be able to exist with pike in some waters doesn't mean that the pike aren't having extensive adverse effects on the reproduction of the toads. Info presented in the EA is inadequate to show that 1) boreal toads don't exist at Horseshoe Lake, and 2) that esocid predation is not an additional predation pressure on boreal toads that contributes to cumulative effects depressing or possibly preventing boreal toad populations.

Given the past history of extensive illegal introductions of fish in northwest Montana, it is virtually a given that tiger muskies would be illegally moved to other waters, including the Fisher River system and other lakes that may or may not have northern pike already present. As long as the tiger muskies exist in Horseshoe Lake they would be available for continued illegal transplants to other waters. There is no guarantee that the tiger muskies wouldn't be moved considerable distances to other waters where only "desirable" salmonids exist. The certainty of illegal transplants should be an unacceptable expected effect of the proposed introduction of tiger muskies.

On page 21 Part IV, EA Conclusion Section, Part A contains 2 conclusions that can't be supported and also 1 important omission. The incorrect conclusions are: 1) impacts will be confined to Horseshoe Lake and 2) impacts on loons and bald eagles can be mitigated. Illegal transplants have a very high probability of occurring and it is likely given the past history of illegal transplants in northwest Montana that the transplants will be somewhere where there will be adverse effects, therefore the effects will not be confined to Horseshoe Lake. Loon chick predation cannot be mitigated if the tiger muskies are introduced. Info in the EA doesn't convince the reader that predation is not a problem. Introducing a more "desirable" fish species will only increase the human activities that create problems for nesting bald eagles and loon usage. Mitigation proposed is only as good as the enforcement and MT FWP certainly doesn't have the manpower to ensure 100% compliance with the mitigation measures. Completely omitted are the likely effects on boreal toads.

Thank you for the opportunity to comment.

Lewis Young
Conservation Committee Chair
Flathead Audubon Society
50 Garrison Drive
Eureka, MT 59917
406-889-3492