

Comments to YNP Scoping Process on Native Fish Conservation Plan

**Offered by Trout Unlimited's Wyoming Council and East Yellowstone Chapter
April 13th 2010, Cody, WY**

My name is David Sweet. I am the Chairman of the Wyoming Council of Trout Unlimited (WYTU) and also the Chairman of the "Save the Yellowstone Cutthroat" committee of the East Yellowstone Chapter of Trout Unlimited (EYCTU) in Cody, WY. The WY Council of TU is comprised of 1400 members statewide, 200 of which are members of the EYCTU. I want to sincerely thank you for allowing public input to your scoping process.

TU has been deeply concerned about the decline of Yellowstone Cutthroat trout (YCT) in Yellowstone Lake and the upper Yellowstone River for many years. In January of 2008 we formed the committee "Save the Yellowstone Cutthroat" in response to the continued downwards spiral of that population and the continued increase in lake trout numbers in spite of the gill netting efforts by the NPS over the previous 14 years. Our committee has been raising funds to support research which will develop alternative and supplemental techniques for suppressing lake trout by targeting their eggs. In addition, we have been trying to raise the awareness of the problem and encourage the agencies to address it before it is too late and the Yellowstone cutthroats are gone from this system. Our fundraising efforts and publicity campaign with resultant governmental grants have allowed Dr. Gresswell to begin his research. That research is now starting to bear results which will assist in suppressing lake trout in future years.

I don't have to tell any of you of the importance of Yellowstone Lake's YCT population which was once estimated to be over 4 million. This was the largest remaining genetically unaltered population of YCT anywhere. The population is now estimated to be less than 10% of that number, and perhaps much less as indicated by your data. An entire ecosystem has developed over the millennia that is dependent on YCT which have been called the keystone species in the ecosystem. Over 40 other species utilize that population. The YCT decline impacts grizzly bears, bald eagles, otters, ospreys and many other iconic species. In addition to the lake trout predation, the YCT is threatened in this system by whirling disease and draught. This population is simply too valuable to be lost.

Every effort should be devoted to preserving it. I would argue that every resource that the NPS's fisheries crews have should be redirected to this system, even if it means putting on hold the efforts to supplement Westslope cutthroat populations in other waters of the Park. The threat to those populations is significantly less than the threat to the YCT in Yellowstone Lake.

Two major scientific symposia have been held to address the decline of YCT by lake trout predation. The first was in 1995. The most recent was in August of 2008 at Chico Hot Springs. This symposium was attended by some of the finest minds in fisheries research and fisheries management from all over the US. Their bottom line conclusion was that it is not too late to save this population; however, they further stated and I quote "The scope of the Yellowstone cutthroat trout decline requires rededication of NPS resources and expansion of partnerships and programs to restore the Yellowstone Lake ecosystem." An entire list of recommendations to the NPS resulted from that symposium to address the YCT decline and the lake trout issue.

Trout Unlimited is pleased that the NPS has finally responded to a portion of one of those recommendations, to involve commercial, professional gill netters on the Lake so that they can apply their skills and techniques. We acknowledge your financial commitment to this endeavor and want to thank you for making this shift in policy. What we do not understand, however, is your limited use of this professional gill netting crew. Last summer they were on the Lake for less than 2 weeks. This summer they are scheduled for only 10 weeks. If you are serious about removing lake trout as quickly as possible and as thoroughly as possible, the professional crew must be employed the entire season, not just part of it.

We are also concerned by the lack of attention to the balance of the recommendations made by this scientific panel and by the delays in implementing their recommendations.

Specifically: Recommendation 1 in their report spells out that lake trout "distribution and movements patterns must be determined to increase the effectiveness of suppression efforts. This should include telemetry studies, distribution netting, and hydroacoustic studies." Specifically, the report calls for the implanting of 50 radio telemetry tags in 50 fish during the spring of 2009.

That was one year ago. I don't believe this was done, nor is it listed as part of your possible actions. Perhaps someone can correct me if I am wrong. Further the report recommends that you "Initiate a mark-recapture study from many locations around the lake in order to identify additional spawning sites." The scientists suggest a minimum of 2000 fish for this study. Again, I don't believe this has been done. Also, it recommends to "Set benchmarks for lake trout control." Have these been set?

The value of these telemetry and mark-recapture studies cannot be overstated. The movement patterns and spawning site locations of the lake trout must be known if we are ever to control their numbers. Without that information, efficient control is guesswork. Targeting lake trout on their spawning grounds is limited to those few sites that have already been identified. That list of known sites is almost certainly incomplete. The recent studies on lake trout in Swan Lake certainly bear out the importance of identifying all the known spawning grounds.

In Recommendation 2, the scientists say to "Maintain the Yellowstone cutthroat trout monitoring program at Clear Creek." It is my understanding that the Clear Creek weir was washed out last spring by runoff and that it has not been rebuilt. This is the most scientifically valid data collection site that you have to monitor the YCT population. It must be rebuilt to ensure continuity of data collection as the panel suggested.

In Recommendation 3, the scientific panel again suggests a mark-recapture study on lake trout in order to "estimate the lake trout population size with sufficient precision to provide an estimate of short-term removal necessary to initiate decline," among other reasons. Also in that section, they again recommend a hydroacoustic study.

In Recommendation 4, the scientific panel recommends the "development of a lake trout suppression plan to maintain and increase agency administrative commitment to meet benchmarks and increase effectiveness of lake trout removal and the conservation of the Yellowstone Lake ecosystem through the coming decades." They suggest you do this by initiating a Science Advisory Committee and to ensure that facilities and policies meet the needs of the lake trout suppression program. Has this committee been formed? Dr. Michael

Hansen of the University of Wisconsin – Stevens Point summed up the change in approach best during the symposium. He said and I quote “the NPS needs to declare war on the lake trout in Yellowstone Lake and adjust its policies to match that war environment”. As examples of what he was describing I would like to highlight some of your policies which inhibit successful suppression efforts. These include: (1)Your insistence that the gill netting boats maintain 5 mph speed limits in no wake areas even though they are trying to maximize their daily gill netting efforts. I understand that one of your boat operators actually got a ticket for exceeding that speed limit. (2) I have been told that your boats are totally excluded from some areas of the Lake where lake trout may be spawning uninterrupted due to non-motorized provisions. And, (3) Many hours of every working day are lost due to travel time back and forth from Bridge Bay marina when the boats could be based out of Grant when they are working in the West Thumb area. The philosophy applied by your suppression efforts must change to this “declaration of war” mentality. Without that change, you will ultimately lose the war.

I would like to make one final point that was not in the symposium’s recommendations. In fact, it wasn’t reviewed at that meeting. It is the policy of dumping the lake trout carcasses back into the lake after gill netting to maintain the biomass of the system. I personally believe that this practice is flawed and believe it should be thoroughly examined by the Science Advisory Committee. The dumping of lake trout carcasses into the lake does not mimic in any fashion the natural recycle of YCT biomass. That biomass was historically deposited up the spawning tributaries and was available to the entire ecosystem. Lake trout carcasses dumped into the lake only do one thing; they feed other lake trout and cause them to grow larger so that they can feed on more and larger YCT.

I would hope that the NPS accepts in a serious manner the recommendations of the scientific panel that convened at Chico Hot Springs almost two years ago. However, we cannot wait for an EA to be written to implement those recommendations. Furthermore, the very brief outline of the “Possible Actions” of the EA that has been published do not address these recommendations. Time is running out for the YCT in Yellowstone Lake. It is time to take action.