

17 March 2017

Comments from the Flathead Lake Biological Station on new AIS rules from FWP

We are staff scientists at the Flathead Lake Biological Station (University of Montana), which has served as the “Sentinel of the Lake” since 1899. With expertise in various dimensions of aquatic ecology including invasive species, we offer the following input related to the proposed rules.

- We commend FWP for taking action to meet the serious threat Montana faces with invasive mussels.
- We urge and encourage the state to follow through on the proposed actions and to provide sufficient funding for effective education, enforcement, and monitoring for early detection. This is not going to be an easy challenge and will require sustained vigilance and significant investment in prevention, eradication, mitigation, and associated education of the public.
- Funding for research on new approaches and best methodologies for Montana situations is also needed in order to improve monitoring and enable mitigation and eradication.
- The potential costs of spread of mussels beyond their current confirmed sites will be catastrophic for the state’s economy and outdoor way of life. This is especially true for the Flathead Basin, an economic engine of western Montana and the headwaters of the Columbia River.

We offer the following specific comments about the rules themselves. While the rules as specified are important, we believe that stronger actions are needed in some areas. This is because scientific findings have shown that the probability of invasive species establishment is a function of the frequency with which the invasive species is introduced to a new water body (most initial introductions fail).

- Inspection before launch must be widespread and consistently applied and inspections extended to include all periods of the year and extended beyond daylight hours when interstate travel and boating are active.
- The rules do not mention floatplanes but these can also be a vehicle for invasive movement. A plan for their inspection should be implemented.
- “Equipment” subject to inspection should include not only boats and trailers but also boating-associated gear (lifejackets, fishing equipment, waders, etc) and aquatic infrastructure such as buoys, docks, moorings, anchors, and culverts.
- Given that Tiber Lake and Canyon Ferry reservoir are confirmed to contain invasive mussels, mandatory decontamination (not just inspection) should be implemented there. The state should also reconsider its decision to allow fishing tournaments on these waters. Economic gains associated with these fishing tournaments will be very

minor compared to the statewide cost of spreading the mussels. Economic costs felt locally due to such measures should be ameliorated by state compensation of affected parties.

- The state should consider stronger regulations regarding the transport / use of live aquatic bait.

We acknowledge that these actions will not be pain-free. People will be inconvenienced and financial costs will be imposed. However these are relatively small matters compared to the massive costs all Montanans will bear should mussels successfully spread to other lakes.

We would like to close by saying that widespread dispersal of mussels in Montana is NOT INEVITABLE based on experiences in other states that have implemented rigorous prevention approaches. Efforts now are essential, even if they “only” delay invasion as this will buy time as researchers develop feasible means to eliminate them from affected water bodies. Montana also bears great responsibility, both legal and ethical, as caretakers of the headwaters of the Columbia River where invasive mussels would impose exorbitant costs on hydroelectric operations, agriculture, and recreation in that massive basin.

So: all hands on deck! Montana needs to act promptly, effectively, and with all available tactics and technologies. The proposed rules are an important initial step. The world-class expertise of the Bio Station is here to serve the state as it mobilizes to meet this challenge.

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