

MOGA Madison Recreation Plan

I. Tenets of the Plan

- A. **There is no technical basis for the claim of overcrowding.** Fish Wildlife and Parks survey results have been found to be both technically flawed and ill-advised. A high-level peer review of three Department studies suggest information was selectively reported to support a preconceived position of overcrowding. When data are evaluated objectively, results demonstrate a significant majority of anglers fishing the Madison rate their experience as satisfactory. Department reports fail to highlight satisfied anglers and focus only on the minority who reported dissatisfaction.
- B. **There is a technical lack of evidence to support certain types of micromanagement on the Madison River.** Highly restrictive management actions like citizen's days, rest and rotation, decreases in nonresident use, float closures, and commercial caps should only be utilized when there is overwhelming evidence to support their implementation, and when viewed objectively, the survey results lack a strong basis for implementation of these actions at this time. Furthermore, float closures in wade sections are tantamount to circumvention of Montana's treasured Stream Access Law and serve as a main source of exclusion to river access for all users, including those with disabilities.
- C. **Madison River fishery resources are healthy and within historic levels of abundance and size composition.** This is an area of agreement among diverse interests. Specific fishery management objectives are lacking; causing claims of a "tipping point" or resource degradation to be subjective and unsubstantiated. Establishment of measurable objectives is attainable and highly advised in order to monitor resource health.

II. Recommended Management Actions – The MOGA Plan

- 1) **Fix Dissatisfaction with FAS through FAS Ambassador Program.** Creel Survey and Mail Survey results clearly indicate FAS is where the greatest measured frustration exists. There needs to be better management at FAS, particularly during the busy summer season. To accomplish this, MOGA supports the creation of an FAS Ambassador program where personnel would be available at key times and locations to help direct traffic, offer education on FAS and general river etiquette and generally improve the flow of traffic in and out of the FAS sites. This action would provide an immediate benefit and a high-profile awareness, as well as being relatively inexpensive to implement. While support for this program from the Commission is preferred, no Commission action is necessary for FWP to initiate the FAS Ambassador program.
- 2) **Establish biological management objectives for the Madison River fishery resources.** To ensure that the Madison River fishery resource remains intact and continues to thrive we encourage FWP to continue to establish measurable

biological fishery management objectives. These would be presented in the form of ranges based on appropriate historical data. Management efforts would be focused on preserving historical levels as measured by:

- a) Fish per river mile,
- b) Size of the catchable population,
- c) catch rate (fish landed per hour).

The Department does a good job of monitoring these parameters already and establishing management objectives based upon these parameters will take the subjectivity and conjecture out of statements concerning the status of the fishery resources. Deviation from these stated objectives would trigger management actions that would apply to all anglers and therefore serve as an insurance policy against resource degradation.

III. Detailed Analysis and Justification for the MOGA Plan

- 1) **No technical basis for the claim of overcrowding.** MOGA contracted Dr. Jennifer Weeding, PhD, a highly skilled and experienced statistician, to conduct an independent review of the Angler Satisfaction, Demographic and Creel Survey – Upper Madison, 2015 – 2017 report; the primary source document for claims of overcrowding and the urgency to address it. Dr. Weeding’s review illustrates clearly the technical flaws and inherent bias within the source document, leading to the conclusion that there is no technical basis for the claim of overcrowding.

Perhaps the most illustrative way to make this point is to examine the results section of the Angler Satisfaction Report, specifically Question 6, which is broken down into many categories, depending on which appendix you are in. Nearly every statement about dissatisfaction in the Angler Satisfaction Report derive from this question. Of the 198 sampled categories, 183 (92.5%) indicated satisfaction with the trip experience while only 15 categories (7%) indicated dissatisfaction. Selective and biased reporting of survey data has fueled an unnecessary and contentious effort to restrict nonresident, guided, and float angling on the Madison River.

- 2) **Crowding at Fishing Access Sites is the primary issue.** Table 1 below shows ONLY the 15 dissatisfied categories. Here it is worth noting that of the 15 dissatisfied response categories, over half (8) are related to traffic at the Fishing Access Sites. While the report focuses only on dissatisfied anglers, it fails to mention that a majority are simply frustrated with traffic management at the Fishing Access Sites (FAS).

Table 1. Question 6, results from the 15 categories (out of 198) where surveyed anglers responded as dissatisfied.

Category	Group	Reach	Dissatisfied %	Satisfied %
The number of people (and their vehicles) at river access points	All respondents	Hebgen-Lyon	44.5%	25.8%
The number of people (and their vehicles) at river access points	All respondents	Lyon-Ennis Lake	42.1%	26.4%
The number of people (and their vehicles) at river access points	Residents	Hebgen-Lyon	59.8%	19.9%
The number of people (and their vehicles) at river access points	Residents	Lyon-Ennis Lake	54.5%	19.6%
The number of people (and their vehicles) at river access points	Nonresidents	Hebgen-Lyon	36.0%	29.2%
The number of people (and their vehicles) at river access points	11+ years experience	Hebgen-Lyon	53.5%	19.2%
The number of people (and their vehicles) at river access points	11+ years experience	Lyon-Ennis Lake	51.1%	21.5%
The number of people (and their vehicles) at river access points	4-10 years experience	Lyon-Ennis Lake	33.5%	29.6%
The number of people FLOAT FISHING the river	All respondents	Lyon-Ennis Lake	41.2%	29.5%
The number of people FLOAT FISHING the river	Residents	Lyon-Ennis Lake	53.7%	21.6%
The number of people FLOAT FISHING the river	11+ years experience	Lyon-Ennis Lake	41.1%	29.6%
The number of people BANK/WADE FISHING the river	Residents	Hebgen-Lyon	39.8%	26.7%
The number of people BANK/WADE FISHING the river	11+ years experience	Hebgen-Lyon	36.1%	31.1%
The number of people using boats to access the river to bank/wade fish in sections of the river that are closed to fishing from boats	Residents	Hebgen-Lyon	43.5%	33.0%
The number of people using boats to access the river to bank/wade fish in sections of the river that are closed to fishing from boats	11+ years experience	Hebgen-Lyon	38.3%	35.3%

- Number of categories = 198
- Number of categories with satisfied results = 183 (92.5%)
- Number of categories with dissatisfied results = 15 (7.5%)

All dissatisfied results occur during the summer period (June 15 – September 30)

3) **Restricting solely the guided fishery will have no observable impact on use levels.**

Restricting the guided fishery in the way of rest and rotation, citizen's days and any capping/allocation of commercial outfitters and guides, in the face of a biologically robust resource is an unnecessary and extreme measure which will have no impact on crowding. To make this point MOGA conducted a sensitivity analysis and examined the outcome if guided angling was reduced by a full 50%.

In 2016, guided angling accounted for a reported 10.25% of the total number of angling days. Reducing guided effort by 50% of 2016 levels would result in a reduction of about 9,000 angler days, reducing total angler days from 179,000 to about 170,000. A 50% reduction on the number of commercial trips results in only a 5% reduction overall, a level that would be unnoticed by non-guided anglers. To put this in terms of how many people they see (on average) on the river on a given day, instead of seeing 20 people, they will only see 19. **It is preposterous to think that even a 50% reduction in guided angling effort will have any positive effects on crowding. However, a 50% loss in guided effort will have an enormous impact on the economic condition of Ennis, West Yellowstone and Montana at large.**

4) **Economic impacts to the communities of Ennis, West Yellowstone and Virginia City would be significant and unwarranted.**

Ennis and Virginia City would be directly impacted by reductions in the guided angling component of the fishery. West Yellowstone and Big Sky are also large stakeholders in the recreation industry. Data provided by the University of Montana in 2017 Nonresident Traveler Expenditures & Economic Contribution in Madison County shows that Outfitting and Guiding is NUMBER 1 at \$23,523,000; this same report for the area of SW Montana is the NUMBER 3 resource at \$68,559,000. Montana's Outdoor Recreation Industry accounts for \$7.1 billion in consumer spending and more than 71,000 jobs—the 2nd largest sector of the state's economy.

5) **Conflicted policy related to Governor's Office of Outdoor Recreation.**

Restrictions favored by FWP staff are **in direct conflict** with Governor Bullock's Office of Outdoor Recreation and purpose for which it was founded in 2017.

The Office of Outdoor Recreation was founded to ensure that our recreation resources continue to thrive and provide opportunity for current and future generations. To further the growth of this industry and safeguard the unique interests that enable its success, the Office of Outdoor Recreation serves as a centralized point of contact and coordination for the broad outdoor recreation constituency. The office focuses on advocacy, policy, support, and growing new opportunities within the outdoor recreation industry. This commitment makes Montana an ideal environment to innovate, develop, test, and use products and services that will determine the future of the industry and elevate the economies around it.

Arbitrarily restricting sport fishing opportunity on the Madison River by targeting guided and nonresident anglers is in direct conflict with the Governor's policies on Outdoor recreation development.

6) **Evidence of support for the MOGA Plan is significant.** An online petition in support of the MOGA Plan can be viewed at <https://www.thepetitionsite.com/399/727/817/madison-river-recreation-plan-sign-share-and-be-heard/>. At 386 supporters and climbing, Montana residents and residents of other states and countries have given their enthusiastic support to the MOGA Plan.