



International Federation of **FLY FISHERS**

Conserving, Restoring, Educating Through Fly Fishing

Great Lakes Council

December 21, 2017

Jim A. Thompson
District Ranger
USDA Forest Service
Cadillac-Manistee Ranger District
412 Red Apple Road
Manistee, MI 49660

Dear Ranger Thompson:

I am writing on behalf of the Great Lakes Council of the International Federation of Fly Fishers. The Great Lakes Council is the voice of fly anglers in Michigan, Indiana and Northwest Ohio. We are writing to strongly recommend that you **do not** grant the permit requested by the Little River Band of the Ottawa Indians to install an anchoring system in the Manistee River which will be used to anchor a temporary resistance board weir across the river.

There are simply too many unanswered questions and potentially damaging effects to allow this weir to be constructed. These include:

- 1) **Impact on the Fishery-** The weir is scheduled to operate for three months each year during the height of the runs of a number of migratory fish, most notably the steelhead. Anglers come from across the United States to fish for the Big Manistee's wild steelhead. Allowing the installation of this type of weir without fully understanding its possible negative effects is tantamount to playing "russian roulette" with a world class fishery. It is our understanding that the United States Fish and Wildlife service does not favor this project. Why? Other questions include: Who will monitor that fish are released regularly to move up or down stream? Has the Forest Service asked for information documenting that this type of weir has no impact on fish migration? Who will monitor the health of fish and the impact of the weir on the spawning behavior of migratory fish? What will be done if fish are negatively impacted? What regulations will be put in place regarding fishing around the weir? Who will enforce those regulations?
- 2) **Suitability of a Temporary Resistance Board Weir for the Manistee River-** Has this type of weir been tested on a river the size and strength of the Manistee? How

will it hold up against large floating trees that are washed down the river in high water? What are the impacts if it breaks up and washes downstream?

- 3) **Impact on Recreational Use of the River and Boater Safety-** The pictures of the weir show a small boat wide width access that boats will have to use to pass through the weir. Has the Forest Service reviewed safety data regarding this type of passage? Who will pay for damage to the motorized craft that use the river on a daily basis? Has consideration been given that this type of weir presents hazards to canoeists who are paddling non-motorized craft? What signage will warn boaters of the weir? Won't the weir, in fact, act like a river wide "sweeper" and create a significant navigational hazard? Will it be illuminated so that boats don't hit it at night?
- 4) **Why has this project been excluded from an environment impact study or environmental assessment?-** The forest service notice on this project says this proposal falls under the exclusion that includes: "Approval, modification, or continuation of minor special uses of NFS lands...." Applying this exclusion to this project is ludicrous. While the project involves a small amount of forest service land, it affects the entire Big Manistee River system. This is certainly no "minor use".

In summary, there are simply too many unanswered questions about the impact on the fishery, the safety of people who use the river recreationally, and the suitability of this type of weir for a river of this size to allow this project to move forward. We urge you to deny this application. Moreover, any future reconsideration of this project must include an environmental assessment.

Most sincerely,

(signed electronically)

Dennis O'Brien
President

David W. Peterson
Vice President for Conservation

c: Great Lakes Council Board of Directors