



Montana Fish, Wildlife & Parks

1400 South 19th Avenue
Bozeman, MT 59718

April 20, 2020

To: Governor's Office, Tim Baker, State Capitol, Room 204, P.O. Box 200801, Helena, MT 59620-0801
Environmental Quality Council, State Capitol, Room 106, P.O. Box 201704, Helena, MT 59620-1704
Dept. of Environmental Quality, Metcalf Building, P.O. Box 200901, Helena, MT 59620-0901
Dept. of Natural Resources & Conservation, P.O. Box 201601, Helena, MT 59620-1601
Montana Fish, Wildlife & Parks:

Director's Office	Parks Division	Lands Section	FWP Commissioners
Fisheries Division	Legal Unit	Wildlife Division	Design & Construction

MT Historical Society, State Historic Preservation Office, P.O. Box 201202, Helena, MT 59620-1202
MT State Parks Association, P.O. Box 699, Billings, MT 59103
MT State Library, 1515 E. Sixth Ave., P.O. Box 201800, Helena, MT 59620
James Jensen, Montana Environmental Information Center, P.O. Box 1184, Helena, MT 59624
Janet Ellis, Montana Audubon Council, P.O. Box 595, Helena, MT 59624
George Ochenski, P.O. Box 689, Helena, MT 59624
Jerry DiMarco, P.O. Box 1571, Bozeman, MT 59771
Montana Wildlife Federation, P.O. Box 1175, Helena, MT 59624
Wayne Hurst, P.O. Box 728, Libby, MT 59923
Jack Jones, 3014 Irene St., Butte, MT 59701
Jack Atcheson, 2309 Hancock Avenue, Butte MT 59701
U.S. Army Corp of Engineers, Helena
U.S. Fish and Wildlife Service, Helena
U.S. Fish and Wildlife Service, 420 Barrett Street, Dillon, MT 59725
Big Hole Watershed Committee, P.O. Box 931, Butte, MT 59703
Montana Trout Unlimited, P.O. Box 7186, Missoula, MT 59807
Dan Vermillion, FWP Commissioner, Livingston MT
Earnest and Colleen Bacon, 2215 Fishtrap Creek Road, Wisdom, MT 59761
Dept. of Natural Resources and Conservation, 730 N. Montana Street, Dillon, MT 59725-9424
George Grant Chapter of Trout Unlimited, P.O. Box 563, Butte, MT 59703
Skyline Sportsmen, P.O. Box 173, Butte, MT 59703
Anaconda Sportsmen, 2 Cherry, Anaconda, MT 59711
E.T. Bud Moran, Chairman CSKT, PO Box 278, Pablo, MT 59855
Al Lubeck, 2710 Amherst, Ave, Butte, MT 59701
Josiah Pinkham, Tribal Arch., Nez Perce Tribe, PO Box 365, Lapwai, ID 83540
Carl Lewis, Rural Delivery, Wisdom, MT 59761
Bryan Lyndes, P.O. Box 200, Wisdom, MT 59761

Ladies and Gentlemen:

FWP is proposing to introduce Arctic grayling to Bender Creek upstream of a fish barrier near the Forest Service Boundary. A fish barrier was constructed in 2017 on Bender Creek and the non-native brook trout upstream were removed in order to expand an existing westslope cutthroat trout population that was isolated to the headwaters of the stream. That project was completed in 2019. Only 32 cutthroat remained prior to brook trout removal and they were released back into the headwaters of the stream. It will likely be several years before the cutthroat population expands downstream and occupies the habitat near the fish barrier. Recent Arctic grayling releases in

similar streams have proven successful and there is suitable grayling habitat in the lower reaches of Bender Creek upstream of the fish barrier. Therefore, FWP is proposing to introduce Arctic grayling into Bender Creek upstream of the fish barrier on National Forest lands in an effort to expand the current range of the fish and to provide a fishery in the lower reaches of the stream while the cutthroat in the headwaters expand downstream.

This EA was available for review in Helena at FWP's Headquarters, the State Library, and the Environmental Quality Council and at:

http://fwp.mt.gov/news/publicNotices/environmentalAssessments/developmentImprovementsAndEnhancements/pn_0412.html. Public comment was open from February 5th, 2020 through March 5th, 2020. The EA was also noticed in the Montana Standard and the Dillon Tribune. A total of 3 comments were received and are summarized below.

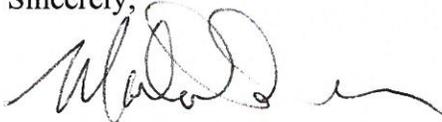
After having considered these comments and potential benefits and the potential drawbacks of the proposed project, it is my decision to proceed with the proposed action of introducing Arctic grayling to Bender Creek. It is also my decision that the EA remains the appropriate level of analysis for this project. There are no long-term, significant impacts of the project that either cannot be mitigated for or that are deemed beneficial.

Questions regarding these Decision Notices should be mailed to:

Montana Fish, Wildlife & Parks
Bender Creek Grayling Introduction
Attn: Jim Olsen
1820 Meadowlark Ln.
Butte, MT 59701

Or e-mailed to: jimolsen@mt.gov

Sincerely,



Mark Deleray
Region Three Supervisor

Bender Creek grayling introduction comments received:

Comment 1. *After reading the EA, it appears Grayling and WCT coexisted in the same waterways. What is the nearest water to Bender Creek that grayling were known to inhabit historically?*

Response: Arctic grayling and westslope cutthroat trout are both native salmonids and coexisted in many waters of the upper Missouri River system. Bender Creek flows into Johnson Creek before it reaches the North Fork Big Hole. The North Fork in recent history has had grayling near the confluence with the North Fork Big Hole, which is about 5 miles from the introduction site on Bender Creek.

Comment 2. *Montana Trout Unlimited (MTU), on behalf of more than 4,000 statewide members, including local membership in our Chuck Robbins and George Grant chapters of Trout Unlimited, recommends that Montana Fish, Wildlife and Parks (FWP) proceed with the proposed native grayling introduction project in Bender Creek, in the Big Hole River drainage. Having been part of the rotenone team in 2018, and knowing the difficulty of the terrain, we think FWP should take the necessary steps to reestablish the full suite of native salmonids to the ecosystem. The habitat in Bender Creek will be suitable for fluvial Arctic grayling (AG) and Westslope cutthroat trout (WCT), two species that evolved together over a millennium in the Big Hole Valley.*

Like many Montanans' our members prize the opportunity to pursue native fish in their native habitat. That is why MTU continually supports the restoration of AG and WCT from genetically-pure sources. This is a unique situation to substantially increase the Upper Missouri headwaters population of AG. This project aligns with FWP's goal and responsibility of increasing a sustainable population of AG in the Upper Missouri drainage.

Response: FWP concurs with this comment.

Comment 3. *I wish to express my strong support for the proposed project to introduce/re-introduce Arctic Grayling to Bender Creek on the Deerlodge-Beaverhead National Forest.*

The project is a very conscientious, proactive, and positively consequential endeavor to bolster a unique Montana wildlife species under duress. The specific process will enhance the more holistic effort to restore Grayling to the historic range and increase the viability of the species for the benefit of every one. There are far too many eggs in a single basket at this juncture, making the expansion of grayling range where possible seem a requisite for long term survival of the fish and likely the long term success of the people in proximity. The potential to relieve the manifold pressures associated with the limited current populations of Grayling and all of the associated consequences of the fish's potential decline or demise should be sufficient driving force to advance this project alone.

The introduction would seem to provide marvelous opportunity to study many key questions: How well projects to expand Grayling/native species habitat perform, what extent of the habitat above the fish barrier the Grayling actually utilize, how the coexistence of the Grayling with the West Slope Cutthroat trout and other native species plays out, what behaviors do Grayling display in attempts to expand their populations, whether a self sustaining Grayling population in Bender creek will serve to reinforce downgrading populations — among other valuable opportunities to get ahead of the game of preserving this species. What can be gained in this project, combined with the knowledge from other projects to help Grayling will allow for more effective and efficient future directions in the overall effort. Like the

management of the toxic water filling the mining pit in Butte — the time to discover the right answerers is before a time of plausibly projected crisis not at it.

The project also is a value added aspect of the previous investment in the stream barrier that was installed for the cutthroat remedial effort.

I do disagree with the assessment that the project will have no impact on current economic or tax levels. There is a very great potential for projects like this to be both highly beneficial to the Montana economy and to reduce tax burden in the long run should the projects prove successful. Thriving, in a class by themselves natives of Bender Creek, big game, bovines, and beaver slides working in concert bring in the bucks — and not just during the spawn or the rut.

Response: FWP concurs with the comment.