



Region 3 Headquarters
1400 South 19th Avenue
Bozeman, MT 59718-5496

July 14, 2021

To whom it may concern,

The enclosed Decision Notice has been prepared to remove non-native trout (hybrid cutthroat trout and brook trout) from a 2.7 mile stretch of Cottonwood Creek near Dillon and replace them with unaltered westslope cutthroat trout (WCT). WCT presently occupy 3.7% of their historic habitat within the Beaverhead watershed. Cottonwood Creek is one of eight streams within the Beaverhead watershed that still supports a genetically unaltered WCT population; however, the population is only comprised of about 520 fish confined to the upper 0.6 miles of stream above a natural waterfall. In 2020, a wooden fish barrier was installed on the lower end of Cottonwood Creek in preparation for this project. Removing non-native trout between the natural waterfall, and the barrier will restore unaltered WCT in 2.7 additional miles of habitat and bring the total number of unaltered WCT in the drainage to >2,500 fish, which would greatly increase the population's probability of long-term persistence. WCT have been petitioned for listing under the Endangered Species Act (ESA), and Montana state law directs FWP to manage candidate species to prevent the need for listing under the ESA. FWP Region 3 (Upper Missouri River) has a goal of restoring WCT (>90% pure) to 20% of their historic range in order to prevent listing under the ESA.

Montana Fish, Wildlife & Parks is required by the Montana Environmental Policy Act (MEPA) to assess significant potential impacts of a proposed action to the human and physical environment. In compliance with MEPA, an Environmental Assessment (EA) was completed for the proposed project by FWP and released for public comment on June 4, 2021.

Public comments on the proposed project were taken for 31 days (through July 5, 2021). The EA notice was mailed to 36 individuals and groups; legal notice was printed in the Montana Standard (Butte) newspaper and the Dillon Tribune. A draft EA was posted on the FWP webpage: <https://fwp.mt.gov/news/public-notice>. Eleven written comments were received via email during the comment period. Nine comments were supportive of the project, and two were generally not supportive. Summaries of the comments are given below.

Supportive Comments (9). *Generally supported native species restoration, unique fishing opportunities, and rotenone as a safe and effective way to remove non-native fish. Most shared*

concern over the drastic reduction in the distribution of WCT. One comment indicated they preferred WCT conservation to wolf conservation.

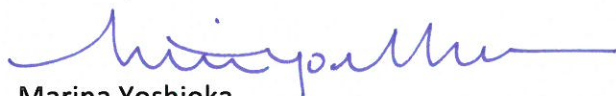
Un-supportive Comments (2): *One commenter indicated they liked eating fish and didn't support fish removal to create "blue-ribbon trout" fisheries. One commenter had concerns about the success of these projects and efforts to protect weak species such as cutthroat and grayling in artificial ways (i.e., creating a "controlled environment" isolated from non-native fish).*

FWP Response to un-supportive comments: *The entire project area on Cottonwood Creek presently falls under general Central District regulations which allow for the harvest of 1 cutthroat trout per day. This regulation will remain in place and unchanged as the unaltered WCT population expands downstream. Generally, "Blue-ribbon" trout streams are associated with the larger, more heavily used non-native trout fisheries in Montana. This project will provide a unique angling opportunity for anglers who like to fish less crowded small streams for native species. Montana FWP has been engaged in projects like these for twenty years. Most of these projects have successfully achieved conservation goals and created a new, unique fishery. In general, the success and efficiency of these projects has improved through time due to more stringent protocols such as treating the stream at least twice and using new technology to verify the absence of fish before attempting to repopulate the stream with native species. Barrier construction has become more standardized as well, which provides greater assurance of long-term success. Although isolating WCT from non-natives with barriers is un-natural relative to historic conditions, the presence of non-native hybridized fish makes it a prerequisite of conservation. Moreover, because all WCT populations in southwest Montana are already un-naturally isolated from one another by non-natives the addition of a barrier does not further disrupt gene flow or create any additional negative impacts to WCT. To account for population fragmentation and disruption of gene flow, the genetic diversity of each WCT is monitored and fish are translocated among populations as needed to improve diversity.*

Based on the Environmental Assessment and need to conserve WCT, it is my decision to proceed with the Cottonwood Creek Westslope Cutthroat Trout conservation project.

I find there to be no significant impacts on the human and physical environments associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environmental Impact Statement is not required.

Sincerely,



Marina Yoshioka
R3 Supervisor