



Fisheries Division
PO Box 200701
Helena, MT 59620

August 31, 2022

Dear Interested Citizens,

Thank you for your reviews, comments, and suggestions on a proposed project to protect a conservation population of Yellowstone cutthroat trout in Mill Creek upstream of the U.S. Forest Service boundary. This project is a collaboration among Montana Fish, Wildlife & Parks, the Custer Gallatin National Forest, private landowners within the immediate project area, and several nonprofit organizations with shared interests and responsibilities in conserving native Yellowstone cutthroat trout. As detailed in the draft environmental assessment, the goal of the project is to eliminate nonnative brook trout from Mill Creek Meadow Spring Creek and neighboring reaches of Mill Creek and tributaries to prevent further spread and establishment of brook trout within this stronghold for native Yellowstone cutthroat trout. Removal of brook trout will entail the use of electrofishing and traps within Mill Creek Meadow Spring Creek with reconnaissance removal efforts occurring in neighboring reaches of Mill Creek and major tributaries. Rainbow trout and hybrids are also threats to Yellowstone cutthroat trout, and these will be removed when encountered.

Enclosed is a decision document in which I explain my rationale for approving the proposed action to proceed with mechanical removal of brook trout from the project area. Upon completion of the public involvement process and by inclusion of information in this decision notice, FWP accepts the draft EA as final. The decision document also includes public comment, along with FWP's responses, which further explain and clarify the actions proposed for this project.

Please feel free to contact me at (406) 444-2448 with any questions. Thank you for your interest and participation.

Sincerely,

Eileen Ryce
Fisheries Division Administrator

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DECISION NOTICE for the DRAFT ENVIRONMENTAL ASSESSMENT:

Mill Creek Meadow Spring Creek Brook Trout Removal and Yellowstone Cutthroat Trout Conservation

Proposal

Montana Fish, Wildlife & Parks (FWP) proposes to remove brook trout Mill Creek Meadow Spring Creek and neighboring reaches of Mill Creek using electrofishing and traps. Brook trout are a primary threat to the persistence of native Yellowstone cutthroat trout, especially in headwater streams. Rainbow trout, and rainbow trout × Yellowstone cutthroat trout hybrids will be removed when encountered in brook trout removal efforts, as they also threaten the genetic integrity of this important stronghold for Yellowstone cutthroat trout.

The goal of the project is to eradicate brook trout from Mill Creek Meadow Spring Creek and surrounding waters. Brook trout invasions occur in pulses, and this small population can take advantage of mild winters to spread beyond their current extent and displace native cutthroat trout – a phenomenon well-documented throughout the western United States for all subspecies of cutthroat trout. Brook trout use the same resources as Yellowstone cutthroat trout and as fall spawners, their fry occupy rearing habitat while Yellowstone cutthroat trout eggs incubate. The mechanism of displacement occurs with these early life stages, with Yellowstone cutthroat trout fry likely unable to compete with brook trout that have had several months of growth before Yellowstone cutthroat trout emerge from the gravel and head to rearing habitat.

The project area is Mill Creek Meadow Spring Creek and neighboring reaches of Mill Creek (Figure 1). Specific actions to attain the goal are as follows:

- Trim riparian vegetation and remove complex habitat that brook trout use to evade capture during electrofishing.
- Use multiple electrofishing passes to remove brook trout in Mill Creek Meadow Spring Creek, taking advantage of their tendency to aggregate in the spring creek in fall.
- Capture brook trout moving into Mill Creek Meadow Spring Creek in a trap and remove from the stream.
- Electrofish neighboring reaches of Mill Creek and nearby tributaries to evaluate extent of brook trout establishment and remove these fish.
- Remove rainbow trout and rainbow trout × Yellowstone cutthroat trout hybrids as they are encountered in brook trout removal efforts.

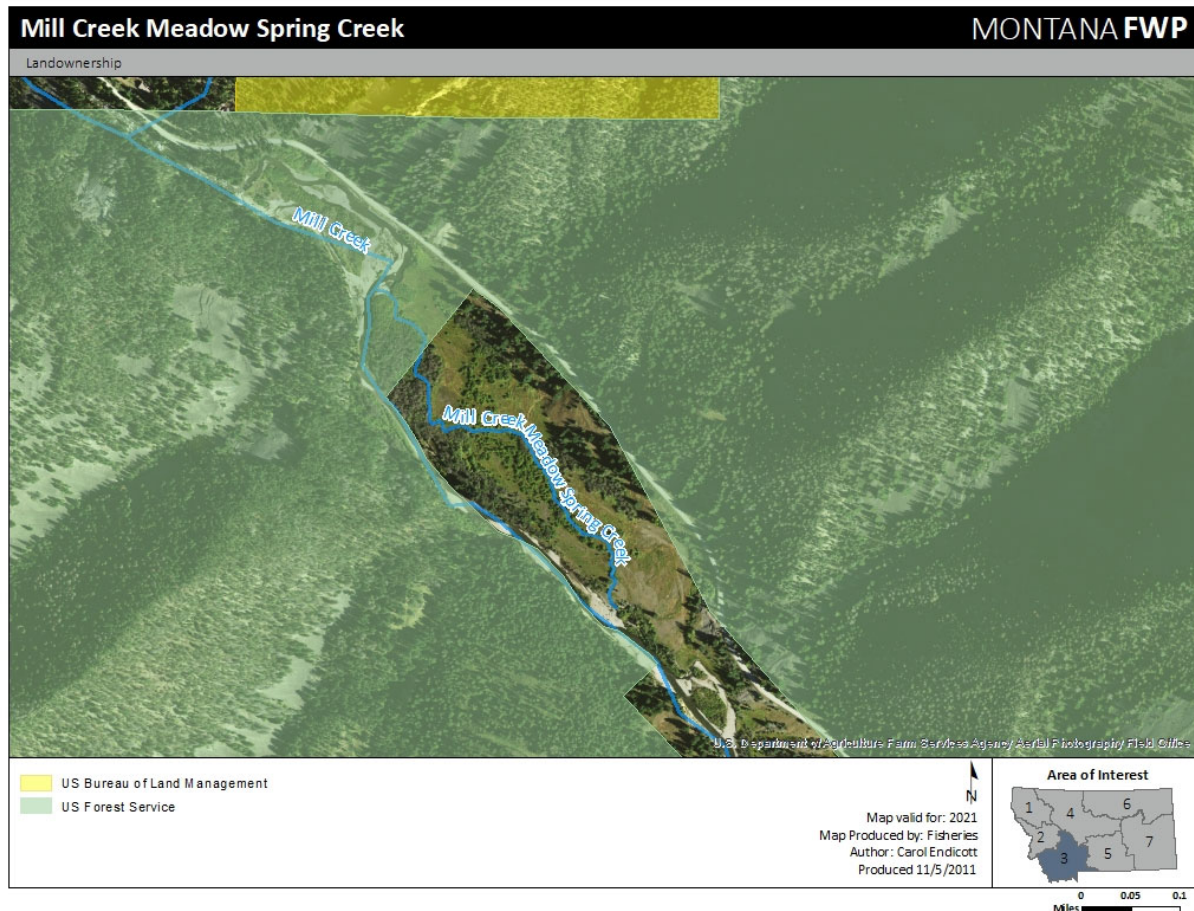


Figure 1. Mill Creek Meadow Spring Creek and focus area for mechanical fish removals.

Alternatives Examined

FWP analyzed 2 alternatives in depth, and this analysis is detailed in the EA ([millcreekmeadowsspringcreekebremovealea.pdf \(mt.gov\)](#)). Angling and chemical removal using a formulation of rotenone were considered but rejected from further analysis. Angling would not work, and rotenone use is not indicated when mechanical means are likely to achieve project goals.

Alternative 1: Proposed Action

The proposed action is to mechanically remove brook trout, rainbow trout, and rainbow trout x Yellowstone cutthroat trout hybrids from Mill Creek Meadow Spring Creek using electrofishing and traps, with an emphasis on brook trout removal. Trimming riparian shrubs and removing instream wood will facilitate capture of brook trout, and these habitat features recover naturally and rapidly within a season of growth. The number of electrofishing passes required to eradicate brook trout varies among streams; however, the small size and simple habitat in Mill Creek Meadow Spring Creek will facilitate eradication. According to the literature,

successful eradication is possible with 13 to 29 removal events, which can be accomplished in one season. Monitoring will determine the need for subsequent removal effort.

Alternative 2: No Action

Under the no action alternative, no brook trout removal efforts would occur, and brook trout would be able to spread from the lower reaches into reaches supporting genetically unaltered populations of Yellowstone cutthroat trout in the headwaters, which places the native cutthroat trout at risk of extirpation. This action would jeopardize a stronghold of Yellowstone cutthroat trout within a climate shield. Climate change is shrinking suitable habitat for Yellowstone cutthroat trout. Increasing their resilience through removal of nonnatives is a key conservation objective.

Public Review Process

The draft EA ([millcreekmeadowsspringcreekremovalea \[mt.gov\]](https://millcreekmeadowsspringcreekremovalea.mt.gov)) was available for public review and comment for a 30-day period from July 5 through August 5, 2022. A statewide press release was distributed on July 6 (<https://fwp.mt.gov/homepage/news/2022/july/0706---fwp-seeks-public-comment-on-yellowstone-cutthroat-project-in-the-mill-creek-watershed>). Notice was also published in the Bozeman Daily Chronicle (July 6, 2022). FWP distributed 1 copy of the EA, and notifications to neighboring landowners. Comments could be submitted via email or US Mail.

Public Comment Overview

Public comment

FWP received comments from 23 individuals or organizations, all were received by email. See **Error! Reference source not found.** for detailed comments. Among commenters, 18 supported the proposed action, which is 78% of all commenters, 4 opposed (18%). One commenter was equivocal. He questioned the methods but acknowledged Yellowstone cutthroat trout required help and proposed an alternative approach. Some supporters had additional questions or suggestions, which are addressed in the response to comments section.

Commenters included individuals and representatives of nongovernmental organizations with in natural resource conservation. Of the nongovernmental organizations, Montana Trout Unlimited, the Trout Unlimited manager for the upper Yellowstone River and Shields, and the Greater Yellowstone Coalition expressed support for the project. Among the 18 individuals expressing support, most were Montana residents, and all reported fishing local streams regularly. Guides and anglers were among supporters. Among the four individuals opposing the proposed action, all but one identified as local residents. Four commenters did not explicitly state where they lived.

Response to Comments

The following response to comments address specific comments in the order they were received.

Commenter 1: Support with concerns.

Hello everyone! I'm commenting on the removal of brook trout in Mill Creek. I agree with preserving the cutthroat trout in this tributary. I used to fly fish the lower half of Mill Creek (approximately 1992 to 2007) about half dozen times a year. During that time cutthroat, as the dominant species, were very healthy, growing as large as 16 to 17 inches. I do have several concerns.

- 1. I'm aware of the upper Newland Creek efforts to remove the dominant brook trout. This Meagher County project indicated the brook trout couldn't be effectively removed without poisoning the entire creek, planting a sterile hybrid trout species to hunt the surviving brookies, then replacing the cutthroat after the hybrids died out. The plan was a longer term project than the electro- shocking proposed for Mill Creek.**
- 2. My concerns are electro-shocking of Mill Creek will only remove some of the brook trout while doing damage to cutthroat fingerlings, insect populations and other creek fauna important to the ecosystem. It appears the methods of brook trout removal vary greatly. My experiences fishing Mill Creek indicated brook trout weren't dormant thus no not a threatening competition to the cutthroat population. Has this situation changed the past fifteen years? I didn't fish the upper portions of Mill Creek, are the brook trout a greater threat in those areas?**
- 3. Will the electroshock treatment of Mill Creek require regular repeat treatments to maintain a dominant cutthroat habitat? - or - would leaving the creek as is with a catch and release of cutthroat and unlimited catch of other trout species provide a better treatment option?**

FWP Response:

Thank you for your support and consideration of potential consequences of the preferred alternative.

Regarding your first item, the draft EA includes a thorough review of the relevant fisheries literature on scenarios where mechanical removal has the potential to achieve the project goal of eradication. Please refer to 2.1.1 Alternative beginning on page 17 for details. In short, this project has high probability of achieving successful eradication of brook trout through mechanical means due to several site characteristics. Mill Creek Meadow Spring Creek is a small stream, less than ½-mile in length, and has simple habitat. Research into mechanical removal has found that electrofishing can be successful in streams less than 2 miles in length, and that removal efforts are more successful with trimming of streamside vegetation and removal of in-stream wood (Shepard et al. 2014).

Speaking with the local biologist for Newlan Creek, he reported no piscicide project had occurred in that stream, but a substantial number of westslope cutthroat trout conservation projects using rotenone have been implemented in Meagher County. The local biologist

reiterated the site-specific nature of determining the appropriate method of fish removal in which short reaches with simple habitat and the ability to remove habitat complexity on a small scale are candidates for successful removal using electrofishing and traps. Mill Creek Meadow Spring Creek is smaller and has simpler habitat than streams where Shepard et al. (2014) found mechanical removal to be a cost-effective approach for limited situations, and Mill Creek Meadow Spring Creek is a suitable candidate.

The second factor that makes mechanical removal feasible in Mill Creek Meadow Spring Creek is the tendency of brook trout to aggregate during fall (Cunjak and Power 1986). Electrofishing in Mill Creek Meadow Spring Creek in October 2016 confirmed brook trout aggregate in Mill Creek Meadow Spring Creek, with over 325 brook trout being captured in this small stream whereas rainbow trout, hybrids, and Yellowstone cutthroat trout were rare, accounting for 7% of fish captured in the stream (see pages 10 through 12 in the EA). Yellowstone cutthroat trout were exceptionally rare in Mill Creek Meadow Spring Creek during this October sampling effort, accounting for 3% of the total catch. The rarity of Yellowstone cutthroat trout in Mill Creek Meadow Spring Creek during fall, and their abundance throughout the rest of the upper Mill Creek drainage indicates few Yellowstone cutthroat trout would be present.

Your second concern addresses the potential for electrofishing to harm Yellowstone cutthroat trout, invertebrates, and other stream fauna. FWP has a research-based electrofishing policy that minimizes harm to fish and nontarget organisms (FWP 2003). The policy calls for electrical pulse rates, durations, and shapes shown to limit harm. The policy notes that larger fish are more susceptible to spinal injuries but cautions to stay within established parameters to also be protective of small fish. Electrofishing has been common practice in fisheries management and research worldwide, and no long-term damage to invertebrates or other aquatic fauna has documented when following protective guidelines like those in FWP's piscicide policy (FWP 2003).

You are correct that brook trout are not the dominant species in upper Mill Creek. Their current low numbers presents an ideal opportunity to remove them before they can invade farther into the watershed and outcompete Yellowstone cutthroat trout. As is detailed in section 1.1.2 Justification for Brook Trout Removal in the EA, brook trout invasions occur in pulses when environmental conditions favor expansion into new habitats. Once established, brook trout are capable of explosive reproduction as females are fertile in their first year. Sometimes, successful invasion and establishment occurs decades after brook trout were translocated to the stream.

The Shields River provides a relevant example of the lag in invasion and establishment, and the rapidity of displacing Yellowstone cutthroat trout if left unchecked. Stocking into the main stem Shields River occurred nearly every year from the 1930s through the 1950s. They slowly but progressively invaded the watershed, and it took 50 years for them to displace Yellowstone cutthroat trout in the Smith Creek watershed, which is several miles upstream of the uppermost site of repeated stocking of brook trout. They had been rare in Smith Creek by the

early 1970s (Berg 1975), but are now the dominant species, with Yellowstone cutthroat trout being apparently eliminated within reaches in the Custer Gallatin National Forest (Clint Sestrich, CGNF, personal communication). They became established in the upper Shields River by 2009 after an extended period of drought and low snowpack facilitated invasion. The loss of Yellowstone cutthroat trout in neighboring Smith Creek 20 years after they were first observed to be established in the watershed provides the cautionary tale that complacency with sparse numbers of brook trout can result in loss of a population in years when biologists are working elsewhere.

The third concern addresses the potential for perpetual or long-term use of electrofishing occur for continued suppression of brook trout. As discussed in the EA, eradication using electrofishing and taking advantage of the aggregating behavior of brook trout is expected to eradicate brook trout from waters in the Mill Creek drainage. Research has found that eradication is achievable in less than 30 passes (Shepard et al. 2014), and field crews working for a few days can accomplish this level of effort on this small stream. A long window for removal efforts was proposed to account for the potential to miss fish the first year, shortages of field labor in some years when other projects have higher priority, or for years when wildfire does not allow field-workers safe access to upper Mill Creek. The goal of the project is eradication, not long-term suppression, and Mill Creek Meadow Spring Creek is an excellent candidate to achieve this goal within 1 or 2 years.

This long window also allows for clean up if some brook trout evade capture and are not detected through eDNA or electrofishing. Suppression of brook trout can greatly depress numbers, but they can rebound dramatically from a few remaining individuals when removal efforts cease (Meyer et al. 2006). The 10-year window allows for flexibility to ensure we achieve eradication.

Regarding establishing fishing regulations that are protective of Yellowstone cutthroat trout and encourage anglers to keep brook trout. These regulations are already in place, with catch and release regulations established for Yellowstone cutthroat trout, and a daily and possession limit on brook trout of 20 fish. The brook trout present in Mill Creek do not grow well, anglers would be likely to throw back smaller fish, and smaller size classes are not vulnerable to angling. Few anglers fish Mill Creek Meadow Spring Creek where brook trout currently aggregate. Angling would not achieve the goal of eradication.

Commenters 2: Support

We strongly support Alternative 1 of the Draft Environmental Assessment. One of us fishes for Yellowstone cutthroat every year in the vicinity - catch and release only. Recently we were reminded by a habitat map of how very limited their habitat is outside of the national park. Please proceed with Alternative 1.

Response:

Thank you for your support of the preferred alternative and recognition that native species conservation does not stop at jurisdictional boundaries. The goal of Yellowstone cutthroat trout conservation in Montana is to protect remaining populations and reestablish populations where possible. Resilience of the species is possible when they occupy a wide range and are not relegated to national parks. Your acknowledgement that Yellowstone cutthroat trout populations should cover more than national parks is consistent with conservation planning and preventing further declines and potential extinction of our native trout.

Commenter 3: Support

I strongly support any effort to remove brook trout in small streams where native cutthroat are present. As a fishing guide in Paradise Valley, having healthy cutthroat trout populations is crucial to our sport fishing tourism industry. People visit from all over the world for a chance to catch these fish, and their presence sustains a ton of quality middle class jobs. I've supported Yellowstone National Park efforts to protect cutthroat trout and support yours as well. Thank you for bringing this to comment and I hope the project moves forward.

Response:

Thank you for your support for the project and Yellowstone cutthroat trout conservation in general. In addition, thank you for your perspective as a fishing guide who benefits directly from the ability to guide anglers to a Yellowstone cutthroat trout. Projects like this on bring conservation benefits to native Yellowstone cutthroat trout and provide anglers with an opportunity to appreciate this icon of Montana's natural heritage.

Commenter 4: Support

I am in support of the Yellowstone cutthroat trout Mill Creek proposed project.

FWP Response:

Thank you for your support for Yellowstone cutthroat trout conservation.

Commenter 5: Opposed

I oppose the removal of brook trout with electrofishing and replacing them with cuts. Leave Mill cr. just the way it is.

FWP Response:

Thank you for your comment. To clarify, the project will remove brook trout using electrofishing, but we have no plans to replace them with Yellowstone cutthroat trout as Yellowstone cutthroat trout are already present and currently abundant in upper Mill Creek. The goal is to protect Mill Creek's Yellowstone cutthroat trout population, which has high conservation and recreational value. Under state and federal laws, publicly reviewed policy, and inter-agency and interstate conservation agreements, FWP has legal and ethical responsibility to protect Mill Creek's Yellowstone cutthroat trout population.

Commenter 6: Opposed

I oppose the project after encountering the process in the Cherry Lake drainage by Melrose. We backpacked into Cherry Lake and then couldn't find clean drinking water because of the poisoning. I can't imagine a bigger waste of taxpayer money.

What makes cutthroat better than brook trout?

FWP Response:

Thank you for your comment. This project will not use rotenone to eradicate brook trout, so water quality will not be altered in removing brook trout, and no restrictions on drinking or contact will occur.

Regarding cost, FWP will collaborate with the Custer Gallatin National Forest, and we have commitments from various conservation organizations to assist with fieldwork. Given the small size of Mill Creek Meadow Spring Creek, its relatively simple habitat, and assistance with trimming shrubs and electrofishing from volunteers, this project will require relatively little financial investment. Research into mechanical versus chemical fish removal places this project as among the most cost-effective means of achieving project goals of brook trout eradication (Shepard et al. 2014). Not implementing the project would risk the spread of brook trout further in the watershed, which is a direct threat to the persistence of Yellowstone cutthroat trout. Project costs would increase considerably if brook trout became established further in the watershed, and rotenone would be the only effective means in a watershed of this size.

Brook trout are a highly valued sport fish in Montana and throughout much of North America. They will remain abundant and widely distributed in Montana allowing anglers opportunities to catch and harvest. Conservation goals for Yellowstone cutthroat trout place protecting existing Yellowstone cutthroat trout populations as the highest conservation priority (MCTSC 2007). The upper Mill Creek watershed is a stronghold for Yellowstone cutthroat trout, and brook trout are among primary threats to Yellowstone cutthroat trout. Montana's goal for Yellowstone cutthroat trout conservation is to protect existing populations and restore those where feasible. Opportunities for restoration are limited in connected streams. Mill Creek is targeted for Yellowstone cutthroat trout conservation as a barrier at the U.S. Forest Service boundary blocks upstream movement of brown trout, brook trout, and some rainbow trout.

Please refer to section 1.1.2 Justification for Brook Trout removal in the EA (pages 13 through 15) for the literature review and analysis of the scientific literature on brook trout invasions and resulting displacement. In short, brook trout invade, become established, and displace cutthroat trout when conditions allow for this species that is otherwise poorly adapted to the harsh conditions present in Mill Creek. Climate change has been buffering the harsh spring runoff, which is allowing brook trout to invade further into the remaining strongholds for Yellowstone cutthroat trout. Failure to act puts this high value native fishery at risk of extirpation and loss of a popular opportunity to catch Yellowstone cutthroat trout.

Commenter 7: Support

Yellowstone Cutthroat should have priority over any and all non-native fish. Mill Creek drainage needs protection. Both biological & access.

Limited commercial use.

I'm for it. Good idea.

FWP Response:

Thank you for your comment and support for Yellowstone cutthroat trout conservation.

Commenter 8: Support

Please do what you need to do to protect the Mill Creek Cutthroat trout.

FWP Response

Thank you for your comment and support for Yellowstone cutthroat trout conservation.

Commenter 9: Support

I am all for the cutthroat project on Mill Creek

FWP Response

Thank you for your comment and support for Yellowstone cutthroat trout conservation.

Commenter 10: Favors cutthroat conservation and proposes alternative approach.

We need to consider the following:

- 1. Should we mess with nature? Should we decide what trout should be where? If brook trout migrate naturally, why do we need to interfere?**
- 2. Many of the trout in Montana waters were brought here and have thrived naturally. So why do we want to interfere with the success of these species?**
- 3. I would suggest a program focused on increasing the Yellowstone cutts by stocking their original waters on a regular basis. (stock cutts only)**

FWP Response:

Thank you for your comment.

Beginning in the late 1800s and continuing for decades, hatchery technology advanced to the point that massive stocking of billions of nonnative brown, rainbow, and brook trout into waters occupied by native trout dramatically reduced abundance and distribution these native fish. Nonnative trout contributed to the extinction of 2 species of cutthroat trout (Jelks et al. 2008). Likewise, stocking nonnative brown and rainbow trout into historical range of brook trout in the Appalachian chain, the Midwest, and eastern Canada has greatly reduced

distribution and abundance of the native brook trout, and fisheries managers in these areas face similar conservation needs as managers conserving native western trout. These were well-intended efforts at the time, aimed at correcting for over-fishing of native fish and to provide recreational fishing of species people valued. Nevertheless, these actions did not consider the harm they caused to native fish and ecosystems and are prime examples of “messing with nature”.

Fisheries managers worldwide are now grappling with the loss of native fish, with nonnative fishes being a primary threat to their persistence (Gozlan et al. 2010). Indeed, of the 29 taxa of imperiled native western freshwater trout of the genus *Oncorhynchus*, nonnative trout are a threat to the persistence of each (Jelks et al. 2008). Habitat degradation is a close second among causes of decline of native fish. This project, among many others of its kind, is part of concerted efforts of fisheries managers across the globe to protect remaining populations of native fish and restore them where feasible. Fisheries managers act to protect remaining populations of native fish to prevent their extinction and to provide enough occupied habitat that these species remain resilient for future generations to enjoy.

Under FWP’s fisheries management plan (FWP 2019), most trout bearing waters in Montana are managed to support nonnative trout. As these fish are not compatible with native cutthroat, species that thrived in these waters for millions of years before the onslaught of introductions, a relatively modest amount of habitat is slated to be secured for native cutthroat trout. Nonnative fish will continue to be widespread and provide opportunities for angling. The goal is to carve out areas where native fish can persist free from the pressures of nonnative trout. Upper Mill Creek is among the areas ideal for conservation of Yellowstone cutthroat trout (Endicott et al. 2013; FWP 2019), and this species is abundant in these waters. Nevertheless, maintaining this basin-level stronghold requires protecting these fish from brook trout that reside in Mill Creek Meadow Spring Creek and rainbow trout that are gaining access over the barrier installed at the U.S. Forest Service boundary. Brook trout and rainbow trout will continue to thrive in most trout-bearing waters in Montana.

Stocking hatchery fish to augment populations of Yellowstone cutthroat trout would not achieve conservation goals, as stocked fish are less fit given different selective pressures in the hatchery environment and early life experiences in concrete raceways that do not prepare these fish for lives in nature. Stocked fish are disruptive to wild fish given these factors. Research in Montana found wild fisheries to be superior to those stocked with hatchery fish (Vincent 1987). Montana ceased stocking streams in the 1970s, and this practice has been adopted by other states and management entities as a proven approach to providing healthier fish populations and high-quality angling opportunities. Augmenting wild Yellowstone cutthroat trout populations with hatchery fish would not bring conservation benefits but would disrupt functioning wild fisheries.

Commenter 11: Support

I am in favor of MT FWP's brook trout electrofishing mechanical removal plan in Mill Creek, Park County, MT - a tributary of the YS River. I have caught brook trout far upstream in Mill Creek as high as where Anderson Creek enters.

FWP response:

Thank you for your support and observations on brook trout distribution. These stray brook trout will likely aggregate in Mill Creek Meadow Spring Creek during spawning and to overwinter (Cunjak and Power 1986). Angler reports are invaluable in refining actions to conserve native Yellowstone cutthroat trout.

Commenter 12: Support

Please do replace Brook Trout in Mill Creek with native Cutthroat Trout. Use any method just do it soon.

FWP Response:

Thank you for your comment and support for conservation of native Yellowstone cutthroat trout. One small clarification is in order. Yellowstone cutthroat trout are already abundant in Mill Creek, so there will be no need to replace the brook trout with Yellowstone cutthroat trout. The goal is to protect the existing Yellowstone cutthroat trout from spread and establishment throughout the larger watershed.

Commenter 13: Support

I just wanted to express my support for the removal of brook trout from the tributaries of Mill Creek to protect native cutthroat trout. Removal of exotic species is an important step in protecting and restoring native species.

FWP Response:

Thank you for your comment and support of native Yellowstone cutthroat trout conservation.

Commenter 14: Opposed

I would like to comment against killing the brook trout in the Mill Creek drainage in Paradise Valley. Mill Creek has the best access of anywhere in the valley, and hosts lots of family fishermen. I'm not sure the fishery needs to be "pure" when it's a healthy creek boasting lots of opportunity.

FWP Response:

Mill Creek does provide ample access and is a popular Yellowstone cutthroat trout fishery within the National Forest boundary. Please refer to section 1.1.2 Justification for Brook Trout removal in the EA (pages 13 through 15) for the literature review and analysis of the scientific

literature on brook trout invasions and resulting displacement. In short, brook trout invade, become established, and displace cutthroat trout when conditions allow for this species that is otherwise poorly adapted to the harsh conditions present in Mill Creek. Climate change has been buffering the harsh spring runoff, which is allowing brook trout to invade further into the remaining strongholds for Yellowstone cutthroat trout. Failure to act puts this high value native fishery at risk of extirpation and loss of a popular opportunity to catch Yellowstone cutthroat trout. Currently, anglers fishing upper Mill Creek are targeting Yellowstone cutthroat trout, which are the most abundant species. They are also locally adapted and grow better in the cold waters in the project area.

Commenter 15: Support

Anything we can do to protect and enhance Montana's native fish species should certainly be pursued by FWP. I'm all for the proposed project. Hope it moves forward

FWP response:

Thank you for your comment and support of Yellowstone cutthroat trout conservation.

Commenter 16: Opposed

Sirs: Please read attached response. FWP is making a very big mistake by killing WILD Brook Trout. They may be non-native, but so are most members of the public. Have the Commission members voted on this? Do they even know about FWP's objective?

FWP Response:

This commenter provided comments within an email and a separate document. Some comments are beyond the scope of the proposed action and are directed to FWP commissioners. Portions of these comments that are within the scope of the proposed action will be reviewed here; however, the commenter is encouraged to contact the local commissioner. Each commissioner has received a copy of his comments. The Fish and Wildlife Commission approved the project at its December 14, 2022 meeting. The project follows reviewed fisheries management plans (FWP 2019) and conservation strategies and agreements for Yellowstone cutthroat trout in Montana (MCTSC 2007; Endicott et al. 2013).

Commenter 16: Opposed (continued from separate document)

Well, the progressive-minded Fish Wildlife and Parks Commission is at it again. For some reason not flowing from common sense, FWP wants to kill more wild trout in Park County. Last time they shocked brookies, rainbows, and brown trout to "remove" them from the upper Shields River Basin, because their objective was to increase the population of "native" Yellowstone Cutthroat trout. The same inane reason is why they want to use electro-shocking on Brook trout on a subsidiary of Mill Creek– the article in the Chronicle did not say

that the collected fish were going to be transported downriver, so I must assume that there will be no “transportation” going on.

FWP Response:

The referenced Shields River project did not call for removal of brown trout. According to FWP’s fisheries management plan (FWP 2019), much of the Shields River watershed, especially the main stem, will be managed for brown trout. No brown trout were removed in mechanical removal efforts in the Shields River watershed. That project targeted brook trout in a headwaters stronghold for Yellowstone cutthroat trout and rainbow trout in the main stem.

The FWP commission approved this project as its concept is consistent with multiple conservation plans and agreements guiding efforts to maintain Yellowstone cutthroat trout in portions of its native range (MCTSC 2007; Endicott et al. 2012; FWP 2019).

Brook trout, rainbow trout, and hybrids captured in planned removal efforts will not be transported. The barrier at the U.S. Forest Service boundary is passable to rainbow trout, and they could return. Similarly, translocating brook trout downstream could push them to invade other waters supporting Yellowstone cutthroat trout, creating a threat to a different population. As described in the EA, brook trout invade in pulses and can displace native Yellowstone cutthroat trout within a few years.

Commenter 16: Opposed (continued)

The Chronicle has to start asking simple questions that their readers will want answered. 1) What are the reasons for having a FWP Commission? 2) Do any of these reasons suggest that an important Commission objective should be to increase the population of Yellowstone cutthroat trout in Montana? 3) Isn’t the main purpose of Yellowstone National Park to preserve native species? Does this mean that Montana should spend its dollars on doing the same thing?

FWP Response:

The reasons for an FWP commission is beyond the scope of this project. All citizens have the right to pose these questions to a commissioner. As requested, these comments were provided to all the Fish and Wildlife Commissioners.

The legal, policy, and conservation agreement frameworks that require FWP to implement Yellowstone cutthroat trout conservation projects is detailed in sections 1.3 Relevant Plans and 1.4 Overlapping Jurisdictions & Authority in the EA. These planning documents and laws require FWP and collaborating agencies to protect remaining populations of Yellowstone cutthroat trout, restore those where feasible, and enact projects that prevent their inclusion for protection under the Endangered Species Act.

Yellowstone National Park does not have sole responsibility for conservation of native species, and state and federal laws across the historical range of Yellowstone cutthroat trout, which spans portions of Montana, Wyoming, Idaho, Utah and Nevada, require state and federal agencies to conserve native Yellowstone cutthroat trout as key components of the ecological legacy of the region. The legal and policy framework that defines agency responsibilities towards Yellowstone cutthroat trout conservation are detailed in the EA.

Restricting Yellowstone cutthroat trout conservation to jurisdictional boundaries within national parks would not be sufficient to meet conservation goals for persistence of Yellowstone cutthroat trout in its historical range and if followed would risk increasing the need for protection under the Endangered Species Act. State and federal agencies from throughout the historical range of Yellowstone cutthroat trout meet regularly and collaborate on developing approaches that will keep Yellowstone cutthroat trout widely distributed within its historical range. These productive collaborations and information sharing events help refine conservation approaches to be cost-effective and meet established conservation goals and legal requirements.

Commenter 16: Opposed (continued)

Now for some reality. Yellowstone Cutthroat trout are an inferior species from the point of view of this Montana citizen, and many of my friends. This particular trout is no fun to catch – they fight like a dead log when hooked. This particular trout does not taste as good as any Brook trout, so why propose to burden the Montanan that loves to catch a mess of brookies and fry them that evening or the next morning. Please note that the Yellowstone Park rivers have lots and lots of native Yellowstone Cutthroats. Does this ecosystem need more? Why?

FWP response:

FWP understands the commenters preference for certain species over others; however, FWP has the responsibility to conserve Yellowstone cutthroat trout consistent with conservation plans that have been publicly vetted and adopted. State and federal laws also require FWP work to conserve Yellowstone cutthroat trout within its historical range, and not doing so welcomes lawsuits for failing to meet our legal obligations. Please refer to section 1.3 and 1.4 in the EA for the legal and policy justification for conserving existing populations of Yellowstone cutthroat trout and reestablishing Yellowstone cutthroat trout populations where feasible.

Substantial public support exists for Yellowstone cutthroat trout and native species conservation, and as such, FWP has adopted policies and strategies to conserve this species. Mill Creek is a popular destination for anglers targeting Yellowstone cutthroat trout, as are other secured populations of Yellowstone cutthroat trout. The angling community has diverse views on fish they value, and the department strives to continue to provide quality fishing opportunity for nonnative sport fish while also conserving native species, such as Yellowstone cutthroat trout.

Yellowstone cutthroat trout conservation projects are limited in spatial scope, and brook trout will continue to be widespread in Montana and provide opportunities for angling and harvest. Daily catch and possession limits for brook trout are generous – 20 fish a day – so anglers seeking to fill their creel will have many opportunities to enjoy this activity throughout Montana in streams not slated for cutthroat trout conservation.

Commenter 16: Opposed [continued]

Or what about the FWP's other objectives and the way in which FWP staff proposes to meet such objectives? For example, FWP is worried about over-crowding in the Madison River – I am referring to too many fisher-people, not too many trout. So why hasn't the FWP considered instituting a reservation system such as used by hotel chains and, oh by the way, the English Chalk Streams for the last 150 years. And what about the reservation system for fishing the Spring Creeks near Livingston, MT? Did it not occur to the geniuses on the staff of FWP that they should simply hire someone with a background in reservation systems? Instead, they have wasted a couple of years of locals' time to sit and discuss solutions to this over-crowding problem. So far as I know, no member of the Madison River Over-Crowding Committee has experience with reservation systems.

FWP response:

These issues are beyond the scope of the project under review. Thank you for your comment.

Commenter 16: Opposed (continued)

The real problem with FWP is not its staff but its political commissioners. Are these people arguing for money to be spent on killing wild Brook Trout because they think it is IMPORTANT for Montana to have more native Yellowstone Cutthroat trout in its streams? I know what I prefer, and what thousands of other Montana fishermen like – we like to catch Brookies, Rainbows, and Brown trout. We especially like our trout to be wild not Stocked. And many thousands of our tourists spend lots of money here to fish for these Brookies, Rainbows and Brown trout. If the Yellowstone Cutthroat becomes extinct in Montana (except for the part that lies in Yellowstone National Park), I'd say good riddance.

FWP response:

FWP biologists and managers working under established conservation plans and operating under legal authority to conserve Yellowstone cutthroat trout identify projects and present these to the commission for approval. All fish removal projects, such as the proposed project, are vetted through various interest groups and the public. The public and decision makers highly support conservation projects such as this one. The majority of commentors (82%) to the draft EA for this proposed action supported the proposal.

Montana has a wild fish policy, and streams are no longer stocked. No stocking of Yellowstone cutthroat trout is proposed in this action.

Commenter 16: Opposed (continued)

There is a far more important thing on which to spend our scarce resources with regard to Montana trout. That is, the main diet of our trout consists of macro-invertebrates. These things we call bugs. So, shouldn't FWP be studying the effects of pollution on our bugs? An expert on bugs is known as an entomologist. How many PhD entomologists are on the staff of FWP? You guessed it – zero. But they apparently have lots of people who know zip about insects but love to do electro-shocking.

FWP Response

Aquatic invertebrates are highly valued as part of functioning aquatic ecosystems, indicators of water quality, and rare species require special management to ensure their persistence. Although FWP does not have a PhD level entomologist on staff, we have an invertebrate specialist who identifies invertebrates for most rotenone projects and other special projects associated with fisheries and water quality. That said, a consortium of state and federal agencies, universities, and tribes regularly monitors aquatic macroinvertebrates, and they have developed an extensive, publicly available database of monitoring sites and results. Studying the effects of water pollution on aquatic macroinvertebrates and developing strategies to improve water quality to ensure healthy populations of aquatic macroinvertebrates is Montana Department of Environmental Quality's responsibility, and they are highly active in assessment and monitoring. These data are available to FWP personnel and the public, and we use them in developing environmental assessments and evaluating the effectiveness of habitat restoration projects aimed at improving fisheries, invertebrate populations, and water quality. FWP also hires entomologists as needed to conduct surveys, especially in areas where sensitive species of invertebrate are likely to be present.

Instructions for downloading aquatic invertebrate monitoring data can be found at this link: [WaterQualityPortal_GuidanceManual.pdf \(mt.gov\)](#). Major contributors to the database include scientists from the U.S. Geological Service, the Environmental Protection Agency, Montana Department of Environmental Quality, tribal scientists, and state universities. Consulting firms with diverse specialists on difficult to identify taxa assist with analysis and interpretation of results. A search of the database yielded over 3,500 locations in Montana where scientists have collected invertebrates and sent them to qualified taxonomists for identification and interpretation. Many sites are long-term monitoring sites with an extensive record. The database containing results of aquatic invertebrate sampling has nearly 42,000 records, making aquatic invertebrates among the most studied and sampled group of organisms in the state. Augmenting this database is the Montana Natural Heritage Program, which maintains records of all known species of aquatic macroinvertebrate. The following link leads to the Montana Natural Heritage Programs field guide on insects, including those of aquatic origin ([Class](#)) [Insects - Montana Field Guide \(mt.gov\)](#).

Montana's aquatic macroinvertebrates are well-studied, sampled frequently, and identified by taxonomic experts. The responsibility lies with other entities, but the data are shared and are available to FWP for planning purposes. FWP does not need this level of expertise in house, as other entities are extremely active in this monitoring, have the relevant expertise, and make their data available through an easily navigated online database. The results of monitoring guides selection of habitat restoration projects, and FWP regularly partners with these agencies on restoration. The agencies rely on FWP's fisheries expertise, as we rely on their knowledge of aquatic macroinvertebrates.

Commenter 16: Opposed (continued)

It is time to start replacing, if not the senior staff members of FWP, then the Commissioners who supposedly are giving overall guidance.

FWP response:

Thank you for your comment.

Commenter 17: Support

I strongly support both the Cutthroat restoration project on Mill Creek which involves the eradication of non-native invasive brook trout populations and the Eurasian Water Milfoil eradication project on the Nilan Reservoir. We must stay vigilant to guard against both non-native fish populations and invasive species/plants from establishing a foothold and negatively impacting our pristine waters, fisheries, lakes and reservoirs. I lend my strong support to both projects.

FWP response:

Thank you for your comment and support of Yellowstone cutthroat trout conservation and eradication of Eurasian milfoil. The second is unrelated to the current project, but we appreciate support for addressing aquatic nuisance species that threaten native ecosystems.

Commenter 18: Support

Trout Unlimited, Inc. (TU) appreciates the opportunity to comment in support of the Mill Creek Meadow Spring Creek Brook Trout Removal and Yellowstone Cutthroat Trout Conservation project. Having reviewed the materials, we are pleased to support this project.

TU is a national cold-water conservation organization comprised of 140,000 member-conservationists committed to protecting, restoring, and sustaining coldwater fisheries. Montana TU and its 13 chapters represent approximately 4,200 anglers dedicated to the conservation of Montana's wild and native trout and the clean, cold waters on which they depend. TU has long been active in conservation of native and wild salmonids in the Yellowstone watershed and across Montana. TU's Montana Water Program specializes in

improving instream flows and habitat through negotiating and securing water rights while repairing degraded stream habitats.

TU is working throughout the upper Yellowstone watershed to conserve and improve the health of the watershed and its cold-water fisheries. Mill Creek is an especially important sub-basin for native Yellowstone cutthroat trout and has been identified as being resilient to climate change, with a prediction to remain thermally suitable for Yellowstone cutthroat trout through 2040. Mill Creek is the largest sub-basin in the Upper Yellowstone watershed and supports an important resident headwaters population of Yellowstone cutthroat trout and provides critical spawning habitat for fluvial or migratory Yellowstone cutthroat trout from the Yellowstone River. Competition from brook trout is one of the primary threats to Yellowstone cutthroat trout, and the removal of the brook trout from Mill Creek Meadow Spring Creek while the population is still confined enough to be possible will protect native Yellowstone cutthroat trout from future brook trout competition. This project will remove a potential threat to the Yellowstone cutthroat trout population that utilizes Mill Creek, and further contribute to the conservation of the species.

FWP response:

FWP thanks local Trout Unlimited staff for support and assistance in implementing important Yellowstone cutthroat trout conservation projects. Such partnerships are essential in responsible stewardship of our native trout.

Commenter 19: Support

I have reviewed the draft proposal for removal of brook trout from a portion of Mill Creek and its tributaries. More projects like this are needed across the state. I support the proposed project.

FWP response:

Thank you for your comment and support of Yellowstone cutthroat trout conservation.

Commenter 20: Support

Thank you for the opportunity to provide public comments on the Mill Creek Meadow Spring Creek brook trout removal and Yellowstone cutthroat trout conservation project. Yellowstone cutthroat trout are native to the Greater Yellowstone Ecosystem (GYE) and are found throughout the Snake and Yellowstone River basins. Within the GYE, there have been significant declines in the Yellowstone cutthroat trout's distribution and abundance that are largely attributed to habitat loss, dewatering, barriers to movement, and historical overfishing. Climate change in the form of increasing air temperature, is playing an active role in the species' decline through the loss of cold-water tributaries where fish can seek refuge during the hot summer months. Warming stream temperatures and increasing threats from non-native trout are the biggest threats to the species survival, and it will take concerted conservation effort across multiple partners to help maintain the populations within the GYE.

The proposed project to remove brook trout from Mill Creek Meadow Spring Creek using electrofishing and vegetation removal techniques is a positive step towards supporting Yellowstone cutthroat trout refugia in the upper Yellowstone watershed. This project combined with fish barrier improvements in Mill Creek are allowing for these cold-water strongholds to remain intact for cutthroat trout.

Conservation efforts like these that use a "climate lens" to evaluate and prioritize projects across the GYE are important to support and use as case studies for future projects.

The Greater Yellowstone Coalition thanks Montana Fish, Wildlife & Parks for considering our comments on the Mill Creek cutthroat trout conservation project. We look forward to watching this project progress and are happy to support future efforts like these in the GYE.

FWP Response:

Thank you for your comments and support of Yellowstone cutthroat trout conservation. In addition, thank you for recognizing the role climate change is having on complicating efforts to find safe habitat for our native trout.

Commenter 21: Support

I am writing to register my strong support for the proposal to remove brook trout from the headwaters of Mill Creek. In my experience over the last 20 yrs. of fishing in the Yellowstone and its tributaries, I believe that Mill Creek is the most important population of cutthroat trout in our region. It deserves our protection and the implementation of measures to maintain the current self-sustaining population. Thank you for the good work you do to support our native fisheries.

FWP response:

Thank you for your comments and support of Yellowstone cutthroat trout conservation.

Commenter 22: Support

Thank you for the opportunity to provide comments on the proposed project to conduct mechanical removal of nonnative trout species in Mill Creek Meadow Spring Creek to protect native Yellowstone cutthroat trout (RYCT) from competition and hybridization in Mill Creek YCT conservation area. We have reviewed the proposal and associated draft Environmental Assessment, and we wish to go on record strongly supporting this project under the Proposed Alternative 1.

We believe this project has intrinsic benefit to conserving populations of native YCT in this important watershed, where significant conservation efforts have already been undertaken. As populations of native fish continue to face challenges from non-native fish like brook, rainbow, and rainbow-YCT hybridized trout, invasive species, and climate change throughout their range, this project stands to greatly benefit conservation efforts. Further, this project

helps achieve the agency's prescribed goal of restoring YCT to 20-25% of their historic range. Thank you for your work to develop this project in the Yellowstone River drainage

FWP response:

Thank you for your comments and support of Yellowstone cutthroat trout conservation.

Commenter 23: Support with questions.

In general, I support YCT conservation projects. I'm a little concerned about the choice to use mechanical removal methods. Are the 10 years required for this method actually cheaper than chemical removal? This will also affect personnel available for similar projects for all those years. Will removal of woody debris and overhanging vegetation have to be done every year? Is this going to affect songbird species? Is the removed vegetation going to end up in the creek after every spring runoff? If these are not issues, then best of luck with this project.

FWP Response:

Thank you for your comments, support, and considered questions on the potential for the project to affect riparian vegetation, the stream, and songbirds. The 10-year window slated for this project is an overestimate of the amount of time required to achieve the project objectives. We expect to eradicate brook trout in far fewer than 10 years, but a 10-year window allows flexibility should unforeseen events prevent removal in one or more years. Wildfire especially can result in area closures. The actual eradication could be achieved in 1 or 2 years based on research conducted by (Shepard et al. 2014). Partnering nonprofit groups are volunteering labor in removals, which will keep project costs low.

The vegetation removal will be minor trimming at the streams edge and will not be detectable after a growing season. Songbirds will still have a healthy willow corridor to nest, roost, and feed.

As a spring creek, this stream does not experience large spring runoff with snowmelt. The branches trimmed to facilitate netting brook trout can be placed far from the stream; however, their entry into streams would not harm Mill Creek or Mill Creek Meadow Spring Creek.

I appreciate your considering potential effects of these components of the project, but we expect this small removal effort to be successful within few years, and the riparian shrubs will recover rapidly from the light trimming and debris removal planned.

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Appendix: Public Comment

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
1	7/6/2022	1			local angler	<p>Hello everyone! I'm commenting on the removal of brook trout in Mill Creek. I agree with preserving the cutthroat trout in this tributary. I used to fly fish the lower half of Mill Creek (approximately 1992 to 2007) about half dozen times a year. During that time cutthroat, as the dormant species, were very healthy, growing as large as 16 to 17 inches. I do have several concerns.</p> <p>1. I'm aware of the upper Newland Creek efforts to remove the dominant brook trout. This Meagher County project indicated the brook trout couldn't be effectively removed without poisoning the entire creek, planting a sterile hybrid trout species to hunt the surviving brookies, then replacing the cutthroat after the hybrids died out. The plan was a longer term project than the</p>
1	7/6/2022	1			local angler	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						electro- shocking proposed for Mill Creek.
1	7/6/2022	1			local angler	<p>My concerns are electro-shocking of Mill Creek will only remove some of the brook trout while doing damage to cutthroat fingerlings, insect populations and other creek fauna important to the ecosystem. It appears the methods of brook trout removal vary greatly. My experiences fishing Mill Creek indicated brook trout weren't dormant thus no not a threatening competition to the cutthroat population. Has this situation changed the past fifteen years? I didn't fish the upper portions of Mill Creek, are the brook trout a greater threat in those areas?</p> <p>2. What measures will be put in place to prevent all other trout species from entering Mill Creek from the Yellowstone River? I've caught brown and rainbow trout from the mouth of Mill Creek to a roadside diversion about 8.5</p>
1	7/6/2022	1			local angler	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						miles from the river. Most were small yet a few browns could definitely eat other trout including cutthroat.
						3. Will the electroshock treatment of Mill Creek require regular repeat treatments to maintain a dominant cutthroat habitat? - or - would leaving the creek as is with a catch and release of cutthroat and unlimited catch of other trout species provide a better treatment option?
1	7/6/2022	1			local angler	
						We strongly support Alternative 1 of the Draft Environmental Assessment. One of us fishes for Yellowstone cutthroat every year in the vicinity - catch and release only. Recently we were reminded by a habitat map of how very limited their habitat is outside of the national park. Please proceed with Alternative
2	7/6/2022	1			former local residents	1.

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
3	7/6/2022	1			Paradise Valley	I strongly support any effort to remove brook trout in small streams where native cutthroat are present. As a fishing guide in Paradise Valley, having healthy cutthroat trout populations is curcial to our sport fishing tourism industry. People visit from all over the world for a chance to catch these fish, and their presence sustains a ton of quality middle class jovs. I've supported Yellowstone National Park efforts to protect cutthroat trout and support yours as well. Thank you for brining this to comment and I hope the project moves forward.
4	7/6/2022	1			Livingston	I am in support of the Yellowstone cutthroat trout Mill Creek proposed project
5	7/6/2022		1		Livingston	I oppose the removal of brook trout with electrofishing and replacing them with cuts. Leave Mill cr. just the way it is.
6	7/6/2022		1		unknown	I oppose the project after encountering the process in the Cherry Lake drainage by Melrose. We backpacked into

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
6	7/6/2022		1		unknown	Cherry Lake and then couldn't find clean drinking water because of the poisoning. I can't imagine a bigger waste of taxpayer money. What makes cutthroat better than brook trout?
7	7/7/2022	1			unknown	Yellowstone Cutthroat should have priority over any and all non-native fish. Mill Creek drainage needs protection. Both biological & access.
7	7/7/2022	1			unknown	Limited commercial use.
7	7/7/2022	1			unknown	I'm for it. Good idea.
8	7/7/2022	1			unknown	Please do what you need to do to protect the Mill Creek Cutthroat trout.
9	7/7/2022	1			Livingston	I am all for the cutthroat project on Mill Creek
10	7/7/2022			1	Sheridan, MT	We need to consider the following: 1. Should we mess with nature? Should we decide what trout should be where? If brook trout migrate naturally, why do we need to interfere?
10	7/7/2022			1	Sheridan, MT	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
				1		2. Many of the trout in Montana waters were brought here and have thrived naturally. So why do we want to interfere with the success of these species?
10	7/7/2022				Sheridan, MT	
				1		3. I would suggest a program focused on increasing the Yellowstone cutts by stocking their original waters on a regular basis. (stock cutts only)
10	7/7/2022			1	Sheridan, MT	The cutts need a little help, so give them help by increasing the population in many streams on a regular basis.
10	7/7/2022				Sheridan, MT	
11	7/8/2022	1			Livingston	I am in favor of MT FWP's brook trout electrofishing mechanical removal plan in Mill Creek, Park County, MT - a tributary of the YS River. I have caught brook trout far upstream in Mill Creek as high as where Anderson Creek enters.
12	7/8/2022	1			Lewistown	Please do replace Brook Trout in Mill Creek with native Cutthroat Trout. Use any method just do it soon.

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
13	7/9/2022	1			Ann Arbor, MI	I just wanted to express my support for the removal of brook trout from the tributaries of Mill Creek to protect native cutthroat trout. Removal of exotic species is an important step in protecting and restoring native species.
14	7/9/2022		1		Emigrant	I would like to comment against killing the brook trout in the Mill Creek drainage in Paradise Valley. Mill Creek has the best access of anywhere in the valley, and hosts lots of family fishermen. I'm not sure the fishery needs to be "pure" when it's a healthy creek boasting lots of opportunity.
15	7/13/2022	1			Noxon, MT	Anything we can do to protect and enhance Montana's native fish species should certainly be pursued by FWP. I'm all for the proposed project. Hope it moves forward

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
16	7/13/2022		1		Livingston	Sirs: Please read attached response. FWP is making a very big mistake by killing WILD Brook Trout. They may be non-native, but so are most members of the public. Have the Commission members voted on this? Do they even know about FWP's objective? Best, John Mingo
16	7/13/2022		1		Livingston	Well, the progressive-minded Fish Wildlife and Parks Commission is at it again. For some reason not flowing from common sense, FWP wants to kill more wild trout in Park County. Last time they shocked brookies, rainbows, and brown trout to "remove" them from the upper Shields River Basin, because their objective was to increase the population of "native" Yellowstone Cutthroat trout. The same inane reason is why they want to use electro-shocking on Brook trout on a subsidiary of Mill Creek– the article in the Chronicle did not say that the collected fish were going to be transported

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						downriver, so I must assume that there will be no “transportation” going on.
						The Chronicle has to start asking simple questions that their readers will want answered. 1) What are the reasons for having a FWP Commission? 2) Do any of these reasons suggest that an important Commission <u>objective</u> should be to increase the population of Yellowstone cutthroat trout in Montana? 3) Isn't the main purpose of Yellowstone National Park to preserve native species? Does this mean that Montana should spend its dollars on doing the same thing?
16	7/13/2022		1		Livingston	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method		location	Comment
16	7/13/2022		1			Livingston	Now for some reality. Yellowstone Cutthroat trout are an inferior species from the point of view of this Montana citizen, and many of my friends. This particular trout is no fun to catch – they fight like a dead log when hooked. This particular trout does not taste as good as any Brook trout, so why propose to burden the Montanan that loves to catch a mess of brookies and fry them that evening or the next morning. Please note that the Yellowstone Park rivers have lots and lots of native Yellowstone Cutthroats. Does this ecosystem need more? Why?

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						Or what about the FWP's other objectives and the way in which FWP staff proposes to meet such objectives? For example, FWP is worried about over-crowding in the Madison River – I am referring to too many fisher-people, not too many trout. So why hasn't the FWP considered instituting a reservation system such as used by hotel chains and, oh by the way, the English Chalk Streams for the last 150 years. And what about the reservation system for fishing the Spring Creeks near Livingston, MT? Did it not occur to the geniuses on the staff of FWP that they should simply hire someone with a background in reservation systems? Instead, they have wasted a couple of years of locals' time to sit and discuss solutions to this over-crowding problem. So far as I know, no member of the Madison River Over-Crowding Committee has experience with reservation systems.
16	7/13/2022		1		Livingston	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
16	7/13/2022		1		Livingston	The real problem with FWP is not its staff but its political commissioners. Are these people arguing for money to be spent on killing wild Brook Trout because they think it is IMPORTANT for Montana to have more native Yellowstone Cutthroat trout in its streams? I know what I prefer, and what thousands of other Montana fishermen like – we like to catch Brookies, Rainbows, and Brown trout. We especially like our trout to be wild not Stocked. And many thousands of our tourists spend lots of money here to fish for these Brookies, Rainbows and Brown trout. If the Yellowstone Cutthroat becomes extinct in Montana (except for the part that lies in Yellowstone National Park), I'd say good riddance.

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
16	7/13/2022		1		Livingston	There is a far more important thing on which to spend our scarce resources with regard to Montana trout. That is, the main diet of our trout consists of macro-invertebrates. These things we call bugs. So, shouldn't FWP be studying the effects of pollution on our bugs? An expert on bugs is known as an entomologist. How many PhD entomologists are on the staff of FWP? You guessed it – zero. But they apparently have lots of people who know zip about insects but love to do electro-shocking. It is time to start replacing, if not the senior staff members of FWP, then the Commissioners who supposedly are giving overall guidance.
16	7/13/2022		1		Livingston	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
17	7/14/2022	1			Sheridan, MT	I strongly support both the Cutthroat restoration project on Mill Creek which involves the eradication of non-native invasive brook trout populations and the Eurasian Water Milfoil eradication project on the Nilan Reservoir. We must stay vigilant to guard against both non-native fish populations and invasive species/plants from establishing a foothold and negatively impacting our pristine waters, fisheries, lakes and reservoirs. I lend my strong support to both projects.
18	7/14/2022	1			Bozeman	Trout Unlimited, Inc. (TU) appreciates the opportunity to comment in support of the Mill Creek Meadow Spring Creek Brook Trout Removal and Yellowstone Cutthroat Trout Conservation project. Having reviewed the materials, we are pleased to support this project.

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
18	7/14/2022	1			Bozeman	TU is a national coldwater conservation organization comprised of 140,000 member-conservationists committed to protecting, restoring, and sustaining coldwater fisheries. Montana TU and its 13 chapters represent approximately 4,200 anglers dedicated to the conservation of Montana's wild and native trout and the clean, cold waters on which they depend. TU has long been active in conservation of native and wild salmonids in the Yellowstone watershed and across Montana. TU's Montana Water Program specializes in improving instream flows and habitat through negotiating and securing water rights while repairing degraded stream habitats.

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						<p>TU is working throughout the Upper Yellowstone watershed to conserve and improve the health of the watershed and its coldwater fisheries. Mill Creek is an especially important sub-basin for native Yellowstone cutthroat trout and has been identified as being resilient to climate change, with a prediction to remain thermally suitable for Yellowstone cutthroat trout through 2040. Mill Creek is the largest sub-basin in the Upper Yellowstone watershed and supports an important resident headwaters population of Yellowstone cutthroat trout and provides critical spawning habitat for fluvial or migratory Yellowstone cutthroat trout from the Yellowstone River. Competition from brook trout is one of the primary threats to Yellowstone cutthroat trout, and the removal of the brook trout from Mill Creek Meadow Spring Creek while the population is still confined enough to be possible</p>
18	7/14/2022	1			Bozeman	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						will protect native Yellowstone cutthroat trout from future brook trout competition. This project will remove a potential threat to the Yellowstone cutthroat trout population that utilizes Mill Creek, and further contribute to the conservation of the species.
19	7/16/2022	1			unknown	I have reviewed the draft proposal for removal of brook trout from a portion of Mill Creek and its tributaries. More projects like this are needed across the state. I support the proposed project
20	7/28/2022	1			Bozeman	Thank you for the opportunity to provide public comments on the Mill Creek Meadow Spring Creek brook trout removal and Yellowstone cutthroat trout conservation project

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
						Yellowstone cutthroat trout are native to the Greater Yellowstone Ecosystem (GYE) and are found throughout the Snake and Yellowstone River basins. Within the GYE, there have been significant declines in the Yellowstone cutthroat trout's distribution and abundance that are largely attributed to habitat loss, dewatering, barriers to movement, and historical overfishing. Climate change in the form of increasing air temperature, is playing an active role in the species' decline through the loss of cold-water tributaries where fish can seek refuge during the hot summer months. Warming stream temperatures and increasing threats from nonn-native trout are the biggest threats to the species survival, and it will take concerted conservation effort across multiple partners to help maintain the populations within the GYE.
20	7/28/2022	1			Bozeman	

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
20	7/28/2022	1			Bozeman	The proposed project to remove brook trout from Mill Creek Meadow Spring Creek using electrofishing and vegetation removal techniques is a positive step towards supporting Yellowstone cutthroat trout refugia in the upper Yellowstone watershed. This project, combined with fish barrier improvements in Mill Creek are allowing for these cold-water strongholds to remain intact for cutthroat trout.
20	7/28/2022	1			Bozeman	Conservation efforts like these that use a "climate lens" to evaluate and prioritize projects across the GYE are important to support and use as case studies for future projects.
20	7/28/2022	1			Bozeman	The Greater Yellowstone Coalition thanks Montana Fish, Wildlife & Parks for considering our comments on the Mill Creek cutthroat trout conservation project. We look forward to watching this project proceass and are happy to support future efforts like these in the GYE.

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21	7/30/2022	1			Livingston	I am writing to register my strong support for the proposal to remove brook trout from the headwaters of Mill Creek. In my experience over the last 20 yrs. of fishing in the Yellowstone and its tributaries, I believe that Mill Creek is the most important population of cutthroat trout in our region. It deserves our protection and the implementation of measures to maintain the current self-sustaining population. Thank you for the good work you do to support our native fisheries.
22	8/4/2022	1			Missoula	Thank you for the opportunity to provide comments on the proposed project to conduct mechanical removal of nonnative trout species in Mill Creek Meadow Spring Creek to protect native Yellowstone cutthroat trout (RYCT) from competition and hybridization in Mill Creek YCT conservation area. We have reviewed the proposal and associated draft Environmental Assessment, and we wish to go

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						on record strongly supporting this project under the Proposed Alternative 1.
						We believe this project has intrinsic benefit to conserving populations of native YCT in this important watershed, where significant conservation efforts have already been undertaken. As populations of native fish continue to face challenges from non-native fish like brook, rainbow, and rainbow-YCT hybridized trout, invasive species, and climate change throughout their range, this project stands to greatly benefit conservation efforts. Further, this project helps achieve the agency's prescribed goal of restoring YCT to 20-25% of their historic range. Thank you for your work to develop this project in the Yellowstone River drainage
22	8/4/2022	1			Missoula	
23	8/5/2022	1			Bozeman	In general I support YCT conservation projects

Commenter	Date received	Favor	Oppose	Favors Conservation/ Opposes Method	location	Comment
23	8/5/2022	1			Bozeman	I'm a little concerned about the choice to use mechanical removal methods. Are the 10 years required for this method actually cheaper than chemical removal?
23	8/5/2022	1			Bozeman	This will also affect personnel available for similar projects for all those years.
23	8/5/2022	1			Bozeman	Will removal of woody debris and overhanging vegetation have to be done every year?
23	8/5/2022	1			Bozeman	Is it going to affect songbird species?
23	8/5/2022	1			Bozeman	Is the removed vegetation going to end up in the creek after every spring runoff?
23	8/5/2022	1			Bozeman	If these are not issues, then best of luck with this project.