

DRAFT ENVIRONMENTAL ASSESSMENT CHECKLIST

Westslope Cutthroat Trout Expansion and Genetic Rescue in South Fork Willow Creek (Smith River drainage)

FWP-CEA-FSH-R4-25-011

February 6, 2025



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I. Compliance with the Montana Environmental Policy Act

Before a proposed *project* may be approved, environmental review must be conducted to identify and consider potential impacts of the proposed project on the human and physical environment affected by the project. The Montana Environmental Policy Act (MEPA) and its implementing rules and regulations require different levels of environmental review, depending on the proposed project, significance of potential impacts, and the review timeline. § 75-1-201, Montana Code Annotated (“MCA”), and the Administrative Rules of Montana (“ARM”) 12.2.430, General Requirements of the Environmental Review Process.

FWP must prepare an EA when:

- It is considering a “state-proposed project,” which is defined in § 75-1-220(8)(a) as:
 - (i) a project, program, or activity initiated and directly undertaken by a state agency;
 - (ii) ... a project or activity supported through a contract, grant, subsidy, loan, or other form of funding assistance from a state agency, either singly or in combination with one or more other state agencies; or
 - (iii) ... a project or activity authorized by a state agency acting in a land management capacity for a lease, easement, license, or other authorization to act.
- It is not clear without preparation of an EA whether the proposed project is a major one significantly affecting the quality of the human environment. ARM 12.2.430(3)(a));
- FWP has not otherwise implemented the interdisciplinary analysis and public review purposes listed in ARM 12.2.430(2) (a) and (d) through a similar planning and decision-making process (ARM 12.2.430(3)(b));
- Statutory requirements do not allow sufficient time for the FWP to prepare an EIS (ARM 12.2.430(3)(c));
- The project is not specifically excluded from MEPA review according to § 75-1-220(8)(b) or ARM 12.2.430(5); or
- As an alternative to preparing an EIS, prepare an EA whenever the project is one that might normally require an EIS, but effects which might otherwise be deemed significant appear to be mitigable below the level of significance through design, or enforceable controls or stipulations or both imposed by the agency or other government agencies. For an EA to suffice in this instance, the agency must determine that all the impacts of the proposed project have been accurately identified, that they will be mitigated below the level of significance, and that no significant impact is likely to occur. The agency may not consider compensation for purposes of determining that impacts have been mitigated below the level of significance (ARM 12.2.430(4)).

MEPA is procedural; its intent is to ensure that impacts to the environment associated with a proposed project are fully considered and the public is informed of potential impacts resulting from the project.

II. Background and Description of Proposed Project

Name of Project: Westslope Cutthroat Trout Expansion and Genetic Rescue in South Fork Willow Creek (Smith River drainage).

Montana Fish, Wildlife & Parks (FWP) is proposing to expand the nonhybridized westslope cutthroat trout (WCT) *Oncorhynchus lewisi* population in South Fork Willow Creek (Smith River drainage) into its fishless headwaters above a bedrock barrier that currently limits upstream fish movement in the drainage. The section of South Fork Willow Creek where WCT will be introduced is entirely within the Helena-Lewis and Clark National Forest, Belt Creek-White Sulphur Springs Ranger District. Presently, the nonhybridized population of WCT in South Fork Willow Creek is isolated to a 0.25-mile reach of stream between two bedrock barriers. While small, isolated populations may be safer from hybridization and competition with nonnative fishes, they are at increased risk of

extinction from catastrophic events (e.g. fire, drought) and may eventually suffer negative consequences of inbreeding (Wang et al. 2002). The most recent genetic analysis of this population indicates genetic variation is very low compared to other WCT populations in the Missouri River drainage and is a clear candidate for assisted translocation focused on providing gene flow. FWP is proposing translocation of a small number (5-10 adults) of individuals from a nearby population of nonhybridized Smith River WCT to alleviate genetic load and increase fitness and persistence probability of the South Fork Willow Creek population (Kovach et al. 2022). There is an estimated 4.6 miles of suitable habitat that is presently fishless above the upper bedrock barrier. Expansion and translocation of nonhybridized WCT into the fishless headwaters of upper South Fork Willow Creek would likely secure this population resulting in 4.8 miles of protected WCT habitat and a population of over 2,500 individuals.

Westslope cutthroat trout have declined in abundance, distribution, and genetic diversity throughout their native range (Shepard et al. 2005; Muhlfeld et al. 2016; Heckel et al. 2020). Reduced distribution of WCT is particularly evident in the Missouri River drainage of Montana where nonhybridized populations are estimated to persist in about 4% of habitat they historically occupied. Major factors contributing to this decline include competition with nonnative brook trout *Salvelinus fontinalis*, brown trout *Salmo trutta*, and rainbow trout *O. mykiss* that were first introduced in Montana in the 1890's (Dunham et al. 2002; Peterson et al. 2004), hybridization with rainbow and Yellowstone cutthroat trout *O. virginalis bouvieri* (Leary et al. 1995; Hitt et al. 2003; Muhlfeld et al. 2014, Bourret et al. 2022), habitat changes, and isolation to small headwater streams (Wang et al. 2002). Because of these threats, most remaining WCT populations in the Missouri River drainage are considered to have a low likelihood of long-term (100 years) persistence unless conservation actions are implemented (Shepard et al. 1997).

The declining status of WCT has led to its designation as a *Species of Special Concern* by the State of Montana, a *Species of Conservation Concern* by the U.S. Forest Service (USFS), and a *Special Status Species* by the Bureau of Land Management (BLM). In addition, in 1997 a petition was submitted to the U.S. Fish and Wildlife Service (USFWS) to list WCT as "threatened" under the *Endangered Species Act* (ESA), 16 U.S.C. 1531, et seq. USFWS status reviews have found that WCT were "not warranted" for ESA listing (DOI 2003); however, this finding was in litigation until 2008 and additional efforts to list WCT under the ESA are possible.

To advance WCT conservation efforts in Montana, a Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout in Montana was developed in 1999 by several federal and state resource agencies (including the BLM, FWP, the USFS, and Yellowstone National Park), non-governmental conservation and industry organizations, tribes, resource users, and private landowners (FWP 1999: MOU). The MOU outlined goals and objectives for WCT conservation in Montana, which, if met, would significantly reduce the need for special status designations and listing of WCT under the ESA. The MOU was revised and endorsed by signatories in 2007 (FWP 2007). As described in the MOU, *the primary management goal for WCT in Montana is to ensure the long-term self-sustaining persistence of the subspecies in its historical range*. Presently the highest conservation priority is to secure existing, non-hybridized populations of WCT in place to conserve the remaining genetic diversity left on the landscape. Secure WCT populations are isolated from non-native species (usually by a fish barrier) and occupy enough habitat to ensure long-term persistence. Hilderbrand and Kershner (2000) recommended a minimum WCT population size of 2,500 fish for long-term persistence (>100 years) and Harig and Fausch (2002) recommended a minimum of 5.6 square miles (minimum watershed size) of occupied habitat.

The long-term goal for WCT conservation is to restore secure conservation populations of WCT to 20% of their historic distribution east of the Continental Divide (Upper Missouri River Basin upstream from and including the Judith River; FWP 2023). Mainstem rivers, such as the Smith River, support important non-native recreation fisheries (i.e. brown and rainbow trout) and are not part of this conservation goal. FWP recognizes the value of non-native trout fisheries and will continue to manage 80% of the streams in the upper Missouri River for non-native fish such as brook, rainbow and brown trout. In the Smith River drainage, WCT historically occupied approximately 1,444 miles of streams and rivers. Today there are a total of 17 remaining WCT populations in

small headwater tributaries which occupy just over 70 miles of stream (~ 5% of their historic range). Of these 17 WCT populations, nearly 60% are at risk due to competition and hybridization with non-native fish. Data collected from streams in the Smith River drainage over the past 25 years indicate that many of the WCT populations in the drainage have declined or have been extirpated (Tews et al. 2000; Moser et al. 2011). Projects that secure WCT, such as that proposed for South Fork Willow Creek, are necessary to ensure the continued survival of the species, conserve remaining genetic diversity and meet statutory obligations to prevent listing under the ESA.

South Fork Willow Creek is a tributary of the North Fork Smith River located approximately 5 miles east of White Sulphur Springs, MT. Historically, WCT was the only trout species present in South Fork Willow Creek (Figure 1). The creek is currently occupied by native WCT, non-native brook trout, and rainbow x cutthroat hybrid trout. South Fork Willow Creek contains one of the only four remaining nonhybridized WCT lineages native to the Smith River drainage; however, the population is only comprised of an estimated 105 fish confined to 0.25 miles of stream between two bedrock barriers (Figure 2). Nonnative brook trout and rainbow x cutthroat hybrid trout are present below the lower bedrock barrier. There is an estimated 4.6 miles of habitat that is presently fishless above the upper bedrock barrier. The likelihood of extirpation of isolated cutthroat trout populations in small stream fragments is high due to random environmental events (e.g., drought, fire; Roberts et al. 2013). Expansion of the nonhybridized WCT population into the fishless headwaters of upper South Fork Willow Creek would likely secure this population resulting in 4.8 miles of protected WCT habitat and a population over 2,500 individuals.



Figure 1. Westslope cutthroat trout from South Fork Willow Creek

Nonhybridized juvenile and adult WCT from the 0.25-mile isolated reach of South Fork Willow Creek would be collected by backpack electrofishing. Fish would be transferred upstream of the bedrock barriers in aerated coolers. Transfers would likely occur for 3-5 years but may take longer depending on the numbers of individuals collected and transferred and the rate of colonization. Additionally, translocation of a small number (5-10 adults) of individuals from a nearby population of nonhybridized Smith River WCT would be performed to

alleviate genetic load and increase fitness and persistence probability of the South Fork Willow Creek WCT population (Kovach et al. 2022). Viable WCT populations in the Smith River drainage that could be used as donor sources to be translocated include Cottonwood, Fourmile, Jumping, Lake, Lone Willow, and Middle Fork Big Camas Creek. Montana FWP is considering the proposed action to reduce the extinction risk of a unique WCT population native to north central Montana, expand the current range and add stream mileage to the WCT conservation goals for the Smith River subbasin, and reduce the likelihood of listing of WCT under the ESA.

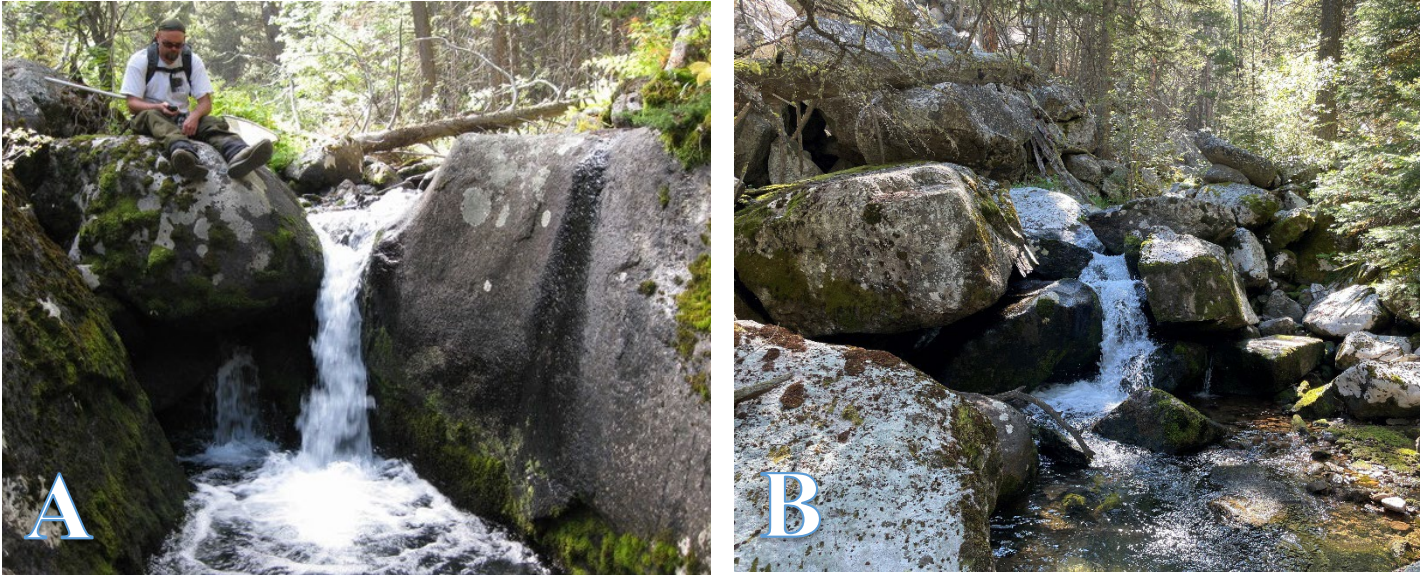


Figure 2. Lower (A) and upper (B) bedrock barriers in South Fork Willow Creek that isolate the nonhybridized WCT population. The lower barrier prevents upstream movement of nonnative brook and hybrid trout. The upper barrier prevents WCT from accessing 4.6 miles of fishless habitat.

Fisheries and habitat surveys of the fishless habitat in South Fork Willow Creek was performed in 2023-2024. South Fork Willow Creek was backpack electrofished from the Manger Park ATV Trail crossing (FS Trail #719) downstream 1.4 miles to the WCT occupied habitat. No fish were collected and habitat appeared excellent with many deep overwintering pools, large woody debris, spawning gravels, and abundant macroinvertebrates observed (Figure 3).



Figure 3. Fishless habitat in South Fork Willow Creek.

A temperature logger was deployed at 46.48936, -110.79503 on South Fork Willow Creek just downstream of the FS Trail #719 crossing on July 2, 2024, and recovered on August 29, 2024. The mean July stream temperature was 6.94°C and the mean August stream temperature was 7.72°C (Figure 4). A temperature logger was also deployed and recovered concurrently on the unnamed tributary to South Fork Willow Creek at 46.49942, -110.78832 just below the FS Trail #716 crossing. The mean July stream temperature was 7.84°C and the mean August stream temperature was 8.81°C (Figure 5). Summer stream temperatures in the fishless reach of South Fork Willow Creek meet the minimum suggested requirements for successful cutthroat trout reproduction and recruitment (Harig and Fausch 2002).

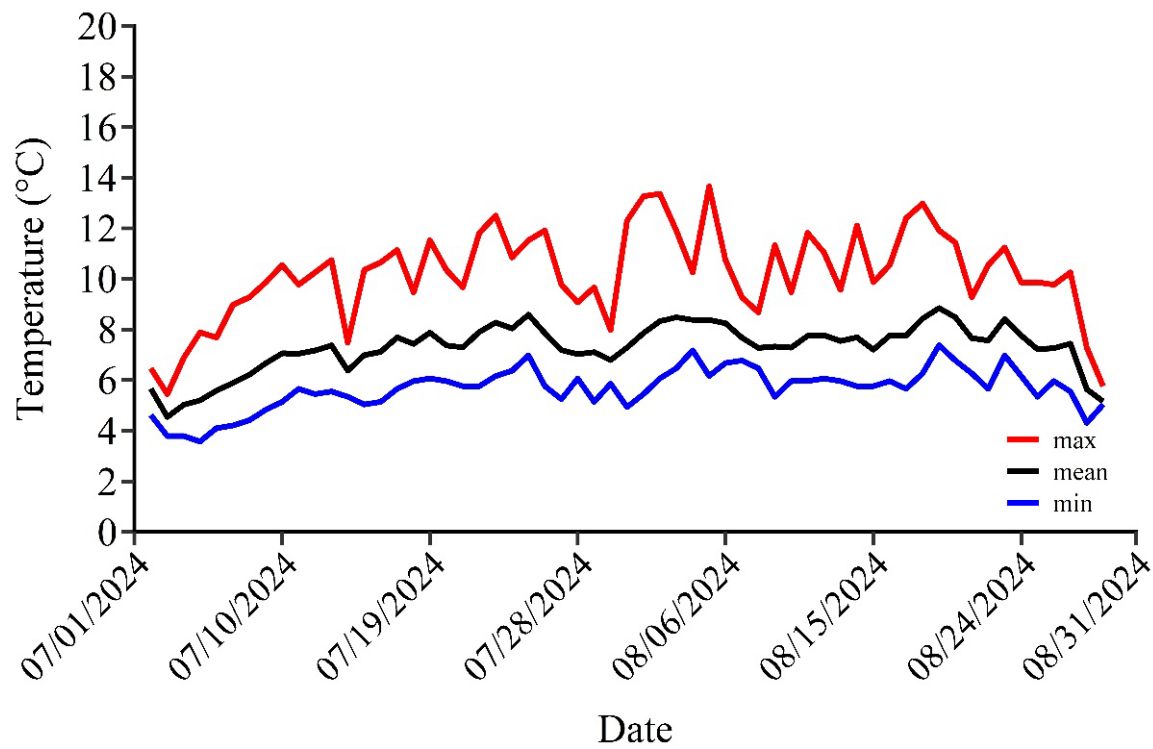


Figure 4. Daily maximum (red line), mean (black line), and minimum (blue line) stream temperatures from South Fork Willow Creek. Temperature logger was deployed on July 2, 2024, and collected August 29, 2024. The mean July stream temperature was 6.94°C and the mean August stream temperature was 7.72°C.

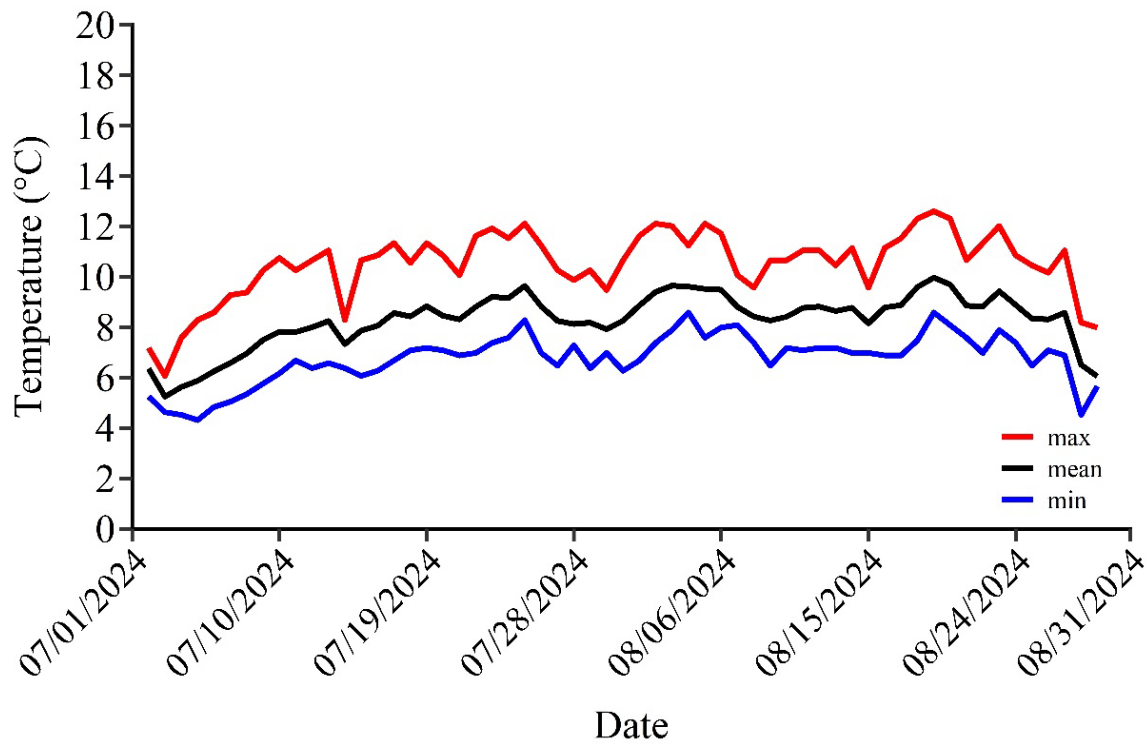
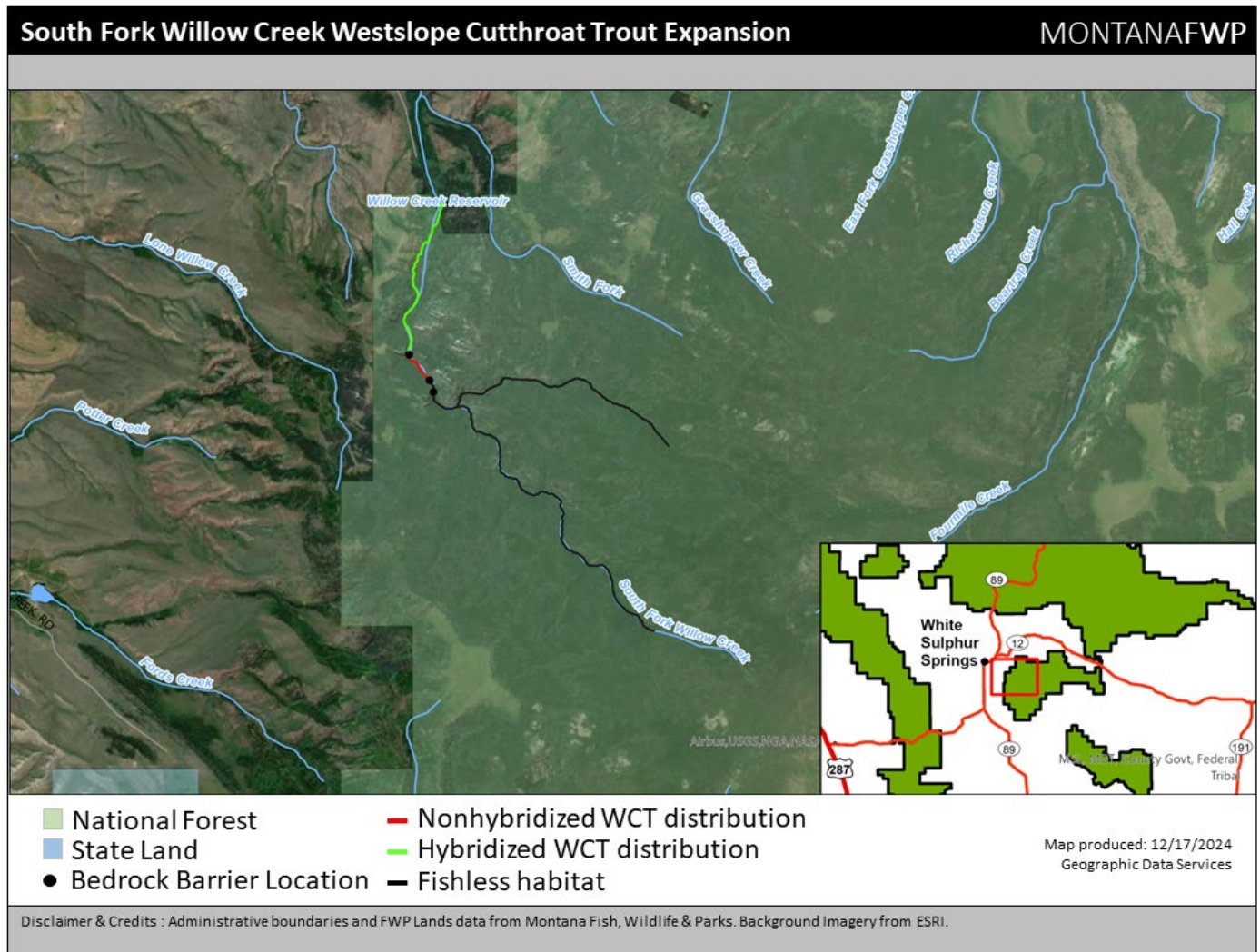


Figure 5. Daily maximum (red line), mean (black line), and minimum (blue line) stream temperatures from the unnamed tributary to South Fork Willow Creek. Temperature logger was deployed on July 2, 2024, and collected August 29, 2024. The mean July stream temperature was 7.84°C and the mean August stream temperature was 8.81°C.

Affected Area / Location of Proposed Project

- Legal Description
 - Latitude/Longitude: 46.4995, -110.8125
 - Section, Township, and Range: T9N R7E Sections 35 and 36; T8N R7E Section 1
 - Town/City, County, Montana: White Sulphur Springs, Meagher County, Montana
- Location Map



III. Purpose and Need

The EA must include a description of the benefits and purpose of the proposed project. ARM 12.2.432(3)(b). Benefits of the proposed project refer to benefits to the resource, public, department, state, and/or other.

The intent of the proposed action would be to support the following FWP goals and objectives:

- Prevent the loss of a unique genetic lineage of WCT native to north central Montana
- Expand the current WCT range in effort to meet WCT conservation goals for the Smith River subbasin
- Reduce the likelihood of ESA-listing of WCT.
- Establish a self-sustaining WCT conservation population in upper South Fork Willow Creek
- Increase the amount of protected WCT habitat in the Smith River drainage by 24.2% (from 19.0 miles to 23.6 miles).

- Use the expanded South Fork Willow Creek WCT population as a donor stream for future WCT conservation efforts in north central Montana

FWP intends to begin WCT transfers into upper South Fork Willow Creek in 2025. Transfers would likely occur over several years (3-5 years) to maximize total number of nonhybridized WCT transferred to fishless habitat.

If FWP prepared a cost/benefit analysis before completion of the EA, the EA must contain the cost/benefit analysis or a reference to it. ARM 12.2.432(3)(b).

	Yes*	No
Was a cost/benefit analysis prepared for the proposed project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* If yes, a copy of the cost/benefit analysis prepared for the proposed project is included in Attachment A to this Draft EA

IV. Other Agency Regulatory Responsibilities

FWP must list any federal, state, and/or local agencies that have overlapping or additional jurisdiction, or environmental review responsibility for the proposed project, as well as permits, licenses, and other required authorizations. ARM 12.2.432(3)(c).

A list of other required local, state, and federal approvals, such as permits, certificates, and/or licenses from affected agencies is included in **Table 1** below. **Table 1** provides a summary of state requirements but does not necessarily represent a complete and comprehensive list of all permits, certificates, or approvals needed. Rather, **Table 1** lists the primary state agencies with regulatory responsibilities, the applicable regulation(s) and the purpose of the regulation(s). Agency decision-making is governed by state and federal laws, including statutes, rules, and regulations, that form the legal basis for the conditions the proposed project must meet to obtain necessary permits, certificates, licenses, or other approvals. Further, these laws set forth the conditions under which each agency could deny the necessary approvals.

Table 1: Federal, State, and/or Local Regulatory Responsibilities

Agency	Type of Authorization (permit, license, stipulation, other)	Purpose
Helena-Lewis and Clark National Forest	Management of forest resource, including South Fork Willow Creek	Consultation on proposed project

V. List of Mitigations, Stipulations

Mitigations, stipulations, and other *enforceable* controls required by FWP, or another agency, may be relied upon to limit potential impacts associated with a proposed Project. The table below lists and evaluates enforceable conditions FWP may rely on to limit potential impacts associated with the proposed Project. ARM 12.2.432(3)(g).

Table 2: Listing and Evaluation of Enforceable Mitigations Limiting Impacts

Are enforceable controls limiting potential impacts of the proposed action? If not, no further evaluation is needed.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If yes, are these controls being relied upon to limit impacts below the level of significance? If yes, list the enforceable control(s) below	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Enforceable Control	Responsible Agency	Authority (Rule, Permit, Stipulation, Other)	Effect of Enforceable Control on Proposed Project
Native and sensitive species management	FWP	Section 87-1-201(9)(a), M.C.A.	FWP is required by law to implement programs that manage sensitive fish species in a manner that assists in the maintenance or recovery of those species, and that prevents the need to list the species under § 87-5-107, MCA, or the federal ESA.
Westslope cutthroat conservation	FWP, DNRC, DEQ, MT Stockgrowers, MT Farm Bureau Federation, USFS, BLM, USFWS, US Natural Resource and Conservation Service and 10 other signatories	Memorandum of Understanding	FWP is a signatory to the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout in Montana (FWP 1999, 2007) which states: "The management goal for WCT in Montana is to ensure the long-term, self-sustaining persistence of the subspecies within each of the five major river drainages they historically inhabited in Montana, and to maintain genetic diversity and life history strategies represented by the remaining local populations."
Westslope cutthroat conservation goal 20% of historically occupied habitat	FWP	State-Wide Fisheries Management Plan	Specifies a management goal of restoring westslope cutthroat trout into the Upper Missouri River drainage to 20% of their historically occupied habitat.
Upper Missouri Westslope Cutthroat Conservation Strategy	FWP	Conservation Strategy	Defines conservation of WCT by translocating genetically unaltered at-risk populations that cannot be protected in place as the second highest conservation priority.
Fish Health Inspection	FWP	Aquatic Health Advisory Committee	Minimizes disease transfer risk associated with movement of wild fish between waterbodies.
Wild Fish Transfer	FWP	Wild Fish Transfer Committee	Ensures that movement of wild fish by FWP personnel is compatible with overall stewardship of Montana's fishery resources.
AIS Early Detection & Monitoring	FWP	AIS Bureau	Minimizes the harmful impacts of AIS through the prevention and management of AIS into, within, and from Montana.

VI. Alternatives Considered

In addition to the proposed Project, and as required by MEPA, FWP analyzes the "no-action" alternative in this EA. Under the "no-action" alternative, FWP would not do the proposed project.

The "no-action" alternative forms the baseline from which the potential impacts of the proposed Project can be measured. Under the no-action alternative FWP would not transfer nonhybridized WCT into the fishless headwaters of

South Fork Willow Creek. Without action, the nonhybridized WCT population in South Fork Willow Creek would remain at increased risk of extinction from catastrophic events (e.g., fire, drought) and would likely suffer negative genetic consequences of inbreeding. The 4.6-miles of fishless habitat in the headwaters of South Fork Willow Creek will remain fishless under the no-action alternative.

	Yes*	No
Were any additional alternatives considered and dismissed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* If yes, a list and description of the other alternatives considered, but not carried forward for detailed review is included below

Other Alternatives Not Carried Forward for Detailed Analysis

No other alternatives were considered but not carried forward for further analysis.

VII. Summary of Potential Impacts of the Proposed Project on the Physical Environment and Human Population

The impacts analysis identifies and evaluates **direct**, **secondary**, and **cumulative impacts**.

- **Direct impacts** are those that occur at the same time and place as the action that triggers the effect.
- **Secondary impacts** “are further impacts to the human environment that may be stimulated or induced by or otherwise result from a direct impact of the action.” ARM 12.2.429(18).
- **Cumulative impacts** “means the collective impacts on the human environment of the proposed action when considered in conjunction with other past and present actions related to the proposed action by location or generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures.” ARM 12.2.429(7).

Where impacts are expected to occur, the impact analysis estimates the **extent**, **duration**, **frequency**, and **severity** of the impact. The duration of an impact is quantified as follows:

- **Short-Term:** impacts that would not last longer than the proposed project.
- **Long-Term:** impacts that would remain or occur following the proposed project.

The severity of an impact is measured using the following:

- **No Impact:** there would be no change from current conditions.
- **Negligible:** an adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor:** the effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate:** the effect would be easily identifiable and would change the function or integrity of the resource.
- **Major:** the effect would irretrievably alter the resource.

Some impacts may require mitigation. As defined in ARM 12.2.429, mitigation means:

- Avoiding an impact by not taking a certain action or parts of a project;
- Minimizing impacts by limiting the degree or magnitude of a project and its implementation;
- Rectifying an impact by repairing, rehabilitating, or restoring the affected environment; or
- Reducing or eliminating an impact over time by preservation and maintenance operations during the life of a project or the time period thereafter that an impact continues.

A list of any mitigation strategies including, but not limited to, design, enforceable controls or stipulations, or both, as applicable to the proposed project is included in **Section VI** above.

FWP must analyze impacts to the physical and human environment for each alternative considered. The proposed project considered the following alternatives:

- **Alternative 1: No Action. Evaluation and Summary of Potential Impacts on the Physical Environment and Human Population**

Under the “No Action” alternative, the proposed project would not occur. Therefore, no additional impacts to the physical environment or human population in the analysis area would occur. The “No Action” alternative forms the baseline from which the potential impacts of the proposed Project can be measured.

Under the no-action alternative FWP would not transfer nonhybridized WCT into the fishless headwaters of South Fork Willow Creek. Without action, the nonhybridized WCT population in South Fork Willow Creek would remain at increased risk of extinction from catastrophic events (e.g., fire, drought) and would likely suffer negative genetic consequences of inbreeding. The 4.6-miles of fishless habitat in the headwaters of South Fork Willow Creek will remain fishless under the no-action alternative.

- **Alternative 2: Proposed Project. Evaluation and Summary of Potential Impacts on the Physical Environment and Human Population**

See **Table 3** (Impacts on Physical Environment) and **Table 4** (Impacts on Human Population) below.

Table 3: Impacts to the Physical Environment – Alternative 2: Proposed Project

PHYSICAL ENVIRONMENT	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
Terrestrial, avian, and aquatic life and habitats	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Introduction of WCT would result in positive long-term moderate impacts to WCT conservation in the Smith River drainage. Introduction of WCT may result in long-term moderate changes in species composition of the aquatic invertebrate community (Benjamin et al. 2011; Lepori et al. 2012) as well as trophic or food web level alterations within the project area. However, overall richness and diversity of invertebrates is likely to be preserved following WCT introduction (Lepori 2012; Banting et al. 2020). Restoring the native fish species is consistent with improved biological integrity, as the native fish would exert the same community level pressure on invertebrates with which they evolved.
Water quality, quantity, and distribution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to water quality, quantity, and distribution would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population and would not require the use of any additional new water resources, nor would it affect the distribution of any existing water resources.
Geology	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to geology would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek. The proposed project would not affect any geologic features in the project area; therefore, no impacts to geology would be expected because of the proposed project.
Soil quality, stability, and moisture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to soil quality, stability, and moisture would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South

PHYSICAL ENVIRONMENT	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
									Fork Willow Creek. The proposed project would not affect soils; therefore, no impacts would be expected because of the proposed project.
Vegetation cover, quantity, and quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to vegetation cover, quantity, and quality would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek. The proposed project would not affect vegetation in the affected area; therefore, no impacts would be expected because of the proposed project.
Aesthetics	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to the aesthetic nature of the affected area would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek. The proposed project would not affect any aesthetic values in the affected area; therefore, no impacts would be expected because of the proposed project.
Air quality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to air quality would be expected because of the proposed project. Air quality in the area affected by the proposed project is currently unclassifiable or in compliance with applicable National and Montana ambient air quality standards (NAAQS/MAAQS). The proposed project constitutes expanding a WCT conservation population in South Fork Willow Creek and, when completed, would not result in additional new air quality disturbance in the affected area. Further, no significant point-sources of air pollution exist in the area affected by the proposed project. Existing sources of air pollution in the area are limited and generally include unpaved county roads (fugitive dust source) and vehicle exhaust emissions. Fugitive dust and

PHYSICAL ENVIRONMENT	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
									vehicle exhaust emissions resulting from the use of motor vehicles for the proposed project may adversely impact air quality. However, any impacts to air quality would be short-term, consistent with existing impacts, and negligible.
Unique, endangered, fragile, or limited environmental resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to any unique, endangered, fragile, or limited environmental resources would be expected because of the proposed project. Westslope cutthroat trout is currently ranked an S2 species of concern. The intent of the proposed project is to expand the distribution of the WCT conservation population in South Fork Willow Creek. Any impacts to WCT would be long-term, beneficial, and moderate. The presence of additional animal or plant Species of Concern and/or any species listed as Threatened or Endangered under the Endangered Species Act (ESA) that may be located within or use the affected area were assessed (Appendix B). FWP is unaware of any other unique, endangered, fragile, or limited environmental resources in the affected area that would be impacted by the proposed project.
Historical and archaeological sites	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to historic and archaeological sites would be expected because of the proposed project. The proposed project does not involve any ground breaking activities.
Demands on environmental resources of land, water, air, and energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to demands on the environmental resources of land, water, air, and energy would be expected because of the proposed project. Fuel would be required to operate equipment and vehicles used for the proposed project. No other demands on the environmental resources of land, water, air, and energy would be expected because of the proposed project. Therefore, any impacts to such resources would be short-

PHYSICAL ENVIRONMENT	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
									term, negligible, and limited to energy resources in the form of fuel.

Table 4: Impacts to the Human Population – Alternative 2: Proposed Project

HUMAN POPULATION	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
Social structures and mores	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to social structures and mores in the affected area would be expected because of the proposed project. WCT have been designated Montana's state fish. Many Montanans and visitors to the state alike hold high regard for wild WCT as an angling resource, an icon of the state, and a valuable component of the ecosystems in which it resides. As such, wild WCT are deeply engrained in the customs and lifestyles of residents and visitors to the state of Montana. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek to prevent the loss of a unique genetic lineage of WCT native to north central Montana; expand the current WCT range by adding the affected stream mileage to the WCT conservation goals for the Smith River subbasin; and reduce the likelihood of ESA-listing of WCT. Therefore, the proposed project would benefit any person who enjoys fishing for WCT or otherwise values the species' existence, the State of Montana, and the ecosystem in which they reside. Any impacts from the proposed project would be long-term, beneficial, and moderate.
Cultural uniqueness and diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant impacts to cultural uniqueness and diversity in the affected area would be expected because of the proposed project. The proposed project constitutes

HUMAN POPULATION		Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource		None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
										expanding the distribution of a WCT conservation population in South Fork Willow Creek, no impacts to the existing cultural uniqueness and diversity of the affected area would be expected because of the proposed project.
Access to and quality of recreational and wilderness activities		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to access or the quality of recreational and wilderness activities would be expected because of the proposed project. No Wilderness areas currently exist in the affected area; therefore, no impacts to Wilderness recreation activities would occur because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek. No closures of public lands would occur because of the proposed project. The new WCT population would provide an opportunity to fish for native trout in a remote natural setting, a long-term, minor, and beneficial impact to recreational opportunities in the affected area.
Local and state tax base and tax revenues		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to the local and state tax base and tax revenue would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek and, when completed, would not result in changes to local or state taxes. The proposed project would be expected to increase state and local tax revenues from the sale of fuel, supplies and/or equipment to complete the project. Any impacts to the local and state tax base and tax revenue would be short-term and negligible, lasting only as long as the proposed project.
Agricultural or Industrial production		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant impacts to agricultural or industrial production in the affected area would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT

HUMAN POPULATION		Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource		None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
										conservation population in South Fork Willow Creek. Because the affected area is not currently used for agricultural and/or industrial production the proposed project would not impact such practices. Therefore, no impacts would be expected because of the proposed project.
Human health and safety		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to human health and safety would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek and, when completed, would not impact human health and safety. Affected government staff may realize increased risk to human health and safety during project implementation; however, FWP would require affected staff to operate in a safe manner and utilize best management practices, including the use of available and appropriate safety precautions. Therefore, any potential impacts to human health and safety would be short-term and negligible, lasting only as long as the proposed project.
Quantity and distribution of employment		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to the quantity and distribution of employment in the affected area would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek. Existing government staff would be used to implement the proposed project as part of their typical job duties. Therefore, no impacts would be expected because of the proposed project.
Distribution and density of population and housing		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to the distribution and density of population and housing would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT

HUMAN POPULATION	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
									conservation population in South Fork Willow Creek using existing government staff for implementation. The proposed project would not require or result in the movement of existing or new population into or out of the affected area. Therefore, no impacts would be expected because of the proposed project.
Demands for government services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to the demands for government services in the affected area would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek and, when completed, would not further impact demands for government services. The proposed project would use existing government staff to complete the work. No additional demands for government services would be expected because of the proposed project. Any impacts would be short-term and negligible.
Industrial, agricultural, and commercial activity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to industrial, agricultural, and commercial activity would be expected because of the proposed project. The proposed project constitutes expanding the distribution of a WCT conservation population in South Fork Willow Creek and would not disturb or otherwise impact any industrial, agricultural, or commercial properties or operations; therefore, no impacts to industrial, agricultural, or commercial activity would be expected because of the proposed project.
Locally adopted environmental plans and goals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposed project would result in beneficial, long-term, and moderate impacts to WCT conservation goals outlined in the Montana Statewide Fisheries Management Plan, Memorandum of Understanding and Conservation Agreement for Westslope and Yellowstone Cutthroat Trout in Montana, and the Helena-Lewis and Clark National Forest Land Management Plan.

HUMAN POPULATION	Duration of Impact			Severity of Impact					Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures
Resource	None	Short-Term	Long-Term	None	Negligible	Minor	Moderate	Major	
Other appropriate social and economic circumstances	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No significant adverse impacts to any other appropriate social and economic circumstances would be expected because of the proposed project. FWP is unaware of any other appropriate social and economic circumstances that may be impacted by the proposed project. Therefore, no significant adverse impacts to other appropriate social and economic circumstances would be expected because of the proposed project.

Table 5: Determining the Significance of Impacts on the Quality of the Human Environment

<p>If the EA identifies impacts associated with the proposed project FWP must determine the significance of the impacts. ARM 12.2.431. This determination forms the basis for FWP's decision as to whether it is necessary to prepare an environmental impact statement.</p> <p>According to the applicable requirements of ARM 12.2.431, FWP must consider the criteria identified in this table to determine the significance of each impact on the quality of the human environment. The significance determination is made by giving weight to these criteria in their totality. For example, impacts identified as moderate or major in severity may not be significant if the duration is short-term. However, moderate or major impacts of short-term duration may be significant if the quantity and quality of the resource is limited and/or the resource is unique or fragile. Further, moderate or major impacts to a resource may not be significant if the quantity of that resource is high or the quality of the resource is not unique or fragile.</p>	
Criteria Used to Determine Significance	
1	<p>The severity, duration, geographic extent, and frequency of the occurrence of the impact</p> <p>“Severity” describes the density of the potential impact, while “extent” describes the area where the impact will likely occur, e.g., a project may propagate ten noxious weeds on a surface area of 1 square foot. Here, the impact may be high in severity, but over a low extent. In contrast, if ten noxious weeds were distributed over ten acres, there may be low severity over a larger extent.</p> <p>“Duration” describes the time period during which an impact may occur, while “frequency” describes how often the impact may occur, e.g., an operation that uses lights to mine at night may have frequent lighting impacts during one season (duration).</p>
2	The probability that the impact will occur if the proposed project occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur
3	Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts

4	The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values
5	The importance to the state and to society of each environmental resource or value that would be affected
6	Any precedent that would be set as a result of an impact of the proposed project that would commit FWP to future actions with significant impacts or a decision in principle about such future actions
7	Potential conflict with local, state, or federal laws, requirements, or formal plans

VIII. Private Property Impact Analysis (Takings)

The 54th Montana Legislature enacted the Private Property Assessment Act, now found at § 2-10-101. The intent was to establish an orderly and consistent process by which state agencies evaluate their proposed projects under the "Takings Clauses" of the United States and Montana Constitutions. The Takings Clause of the Fifth Amendment of the United States Constitution provides: "nor shall private property be taken for public use, without just compensation." Similarly, Article II, Section 29 of the Montana Constitution provides: "Private property shall not be taken or damaged for public use without just compensation..."

The Private Property Assessment Act applies to proposed agency projects pertaining to land or water management or to some other environmental matter that, if adopted and enforced without due process of law and just compensation, would constitute a deprivation of private property in violation of the United States or Montana Constitutions.

The Montana State Attorney General's Office has developed guidelines for use by state agencies to assess the impact of a proposed agency project on private property. The assessment process includes a careful review of all issues identified in the Attorney General's guidance document (Montana Department of Justice 1997). If the use of the guidelines and checklist indicates that a proposed agency project has taking or damaging implications, the agency must prepare an impact assessment in accordance with Section 5 of the Private Property Assessment Act.

Table 6: Private Property Assessment (Takings)

	Yes	No	
<i>Is FWP regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category.) If not, no further analysis is required</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<i>Does the proposed regulatory action restrict the use of the regulated person's private property? If not, no further analysis is required.</i>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Does FWP have legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required</i>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>If so, FWP must determine if there are alternatives that would reduce, minimize, or eliminate the restriction on the use of private property, and analyze such alternatives. Have alternatives been considered and/or analyzed? If so, describe below:</i>	<input type="checkbox"/>	<input type="checkbox"/>	
PRIVATE PROPERTY ASSESMENT ACT (PPAA)			
Does the Proposed Action Have Takings Implications under the PPAA?	Question #	Yes	No
Does the project pertain to land or water management or environmental regulations affecting private property or water rights?	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the action result in either a permanent or an indefinite physical occupation of private property?	2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the action deprive the owner of all economically viable uses of the property?	3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the action require a property owner to dedicate a portion of property or to grant an easement? (If answer is NO, skip questions 4a and 4b and continue with question 6.)	4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there a reasonable, specific connection between the government requirement and legitimate state interest?	4a	<input type="checkbox"/>	<input type="checkbox"/>
Is the government requirement roughly proportional to the impact of the proposed use of the property?	4b	<input type="checkbox"/>	<input type="checkbox"/>

Does the action deny a fundamental attribute of ownership?	5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the action have a severe impact of the value of the property?	6	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public general? (If the answer is NO, skip questions 7a-7c.)	7	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is the impact of government action direct, peculiar, and significant?	7a	<input type="checkbox"/>	<input type="checkbox"/>
Has the government action resulted in the property becoming practically inaccessible, waterlogged, or flooded?	7b	<input type="checkbox"/>	<input type="checkbox"/>
Has the government action diminished property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?	7c	<input type="checkbox"/>	<input type="checkbox"/>
Does the proposed action result in taking or damaging implications?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Taking or damaging implications exist if YES is checked in response to Question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to question 5a or 5b.			
If taking or damaging implications exist, the agency must comply with MCA § 2-10-105 of the PPAA, to include the preparation of a taking or damaging impact assessment. Normally, the preparation of an impact assessment will require consultation with agency legal staff.			
Alternatives: The analysis under the Private Property Assessment Act, §§ 2-10-101 through -112, MCA, indicates no impact. FWP does not plan to impose conditions that would restrict the regulated person's use of private property to constitute a taking.			

IX. Public Participation

The level of analysis in an EA will vary with the complexity and seriousness of environmental issues associated with a proposed action. The level of public interest will also vary. FWP is responsible for adjusting public review to match these factors (ARM 12.2.433(1)). Because FWP determines the proposed action will result in limited environmental impact, and little public interest has been expressed, FWP determines the following public notice strategy will provide an appropriate level of public review:

- An EA is a public document and may be inspected upon request. Any person may obtain a copy of an EA by making a request to FWP. If the document is out-of-print, a copying charge may be levied (ARM 12.2.433(2)).
- Public notice will be served on the Montana Fish, Wildlife and Parks website at:
<https://fwp.mt.gov/aboutfwp/public-comment-opportunities>
- FWP maintains a mailing list of persons interested in a particular action or type of action. FWP will notify all interested persons and distribute copies of the EA to those persons for review and comment (ARM 12.2.433(3)).
- Public notice will announce the availability of the EA, summarize its content, and solicit public comment.
 - **Duration of Public Comment Period:** The public comment period begins on the date of publication on the FWP website. Written or e-mailed comments will be accepted until 5:00 p.m., MST, on the last day of public comment, as listed below:

Length of Public Comment Period: 15 days

Public Comment Period Begins: 02/28/2025

Public Comment Period Ends: 03/15/2025

Comments must be addressed to the FWP contact, as listed below.

○ **Where to Mail or Email Comments on the Draft EA:**

Name: ALEX POOLE

Email: alex.poole@mt.gov

Mailing Address:

FWP Region 4

4600 Giant Springs Road

Great Falls, MT 59405

X. Recommendation for Further Environmental Analysis

NO further analysis is needed for the proposed action	<input checked="" type="checkbox"/>
FWP must conduct EIS level review for the proposed action	<input type="checkbox"/>

XI. EA Preparation and Review

	Name	Title
EA prepared by:	Alex Poole	Native Fish Biologist, FWP Region 4
EA reviewed by:	Jason Mullen	Fisheries Manager, FWP Region 4
	Adam Geik	Great Falls Area Fisheries Biologist, FWP Region 4
	Eric Archer	Fisheries Biologist, Helena-Lewis and Clark National Forest

Appendix A: References

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Appendix B: Sensitive Species of Occurrence (SOC) list for project area.

MT Status	Species Group	Common Name	Scientific Name	Habitat	Distribution
SOC	Fish	Westslope Cutthroat Trout	Oncorhynchus clarkii lewisi	Mountain streams, rivers, lakes	Resident Year Round
SOC	Vascular Plants	Whitebark Pine	Pinus albicaulis	Subalpine forest, timberline	Present
SOC	Birds	Evening Grosbeak	Coccothraustes vespertinus	Conifer forest	Resident Year Round
SOC	Vascular Plants	Arctic Buttercup	Ranunculus grayi	Alpine	Present
SOC	Birds	Bobolink	Dolichonyx oryzivorus	Moist grasslands	Migratory Summer Breeder