



MT Fish, Wildlife & Parks
Region 3 Headquarters
1400 S 19th Avenue
Bozeman, MT 59718

January 13, 2023

USDA, Forest Service, Butte Ranger Station
1820 Meadowlark Street.
Butte, MT 59701

RE: Basin Creek - Butte Watershed

Dear Tim Lahey,

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to comment on Basin Creek - Butte Watershed. This project proposes forest restoration and improvement activities to protect the municipal watershed serving the city of Butte.

There is a herd of 100-150 elk that use the upper Basin Creek watershed, primarily in the winter and spring. Winter use is often in the hills below the Basin Creek Reservoir and on private land in the valley. Spring use is more dispersed throughout the forested areas in the upper watershed where there is good security for calving. FWP supports the Beaverhead-Deerlodge National Forest's plan to conduct forest management in this area to reduce the amount of downed timber that impedes wildlife movement and creates a high fuel load. Given the elk use in this area, we recommend that logging and other construction activities do not occur from May 1st – July 15th for elk calving security. Pausing logging during this period would also benefit nesting gamebirds and songbirds.

Basin Creek Reservoir, the focus of this project, supports a robust genetically pure Westslope cutthroat trout population. This population has been isolated in and above the reservoir for over a century and relies on wild reproduction to maintain the population. Westslope cutthroat trout in the reservoir carry out the entirety of their spawning in the short (100m) reach of Basin Creek between the Lower Basin Creek Reservoir and the sediment catchment basin for the lower reservoir. Any disturbance to this section of Basin Creek due to the project would be detrimental to Westslope cutthroat trout. Due to the unique nature of this spawning area, we recommend that no crossings, permanent or temporary, be done in this reach of Basin Creek. Additionally, Basin Creek upstream of the Lower Basin Creek Reservoir is home to a stream resident population of genetically pure Westslope cutthroat trout throughout the project area. Therefore, any stream crossings of Basin Creek or any of its perennial tributaries would need to provide for appropriate aquatic organism passage.

As a reminder, any work being conducted that could impact the bed or banks of any stream, such as new stream crossings, will require Stream Protection Act SPA-124 permit administered by Montana Fish, Wildlife and Parks. Please allow adequate time (up to 60 days) for the application(s) to be reviewed. Thank you for the opportunity to provide comments for the Basin Creek-Butte Watershed Scoping document. We look forward to working with you on any potential fishery and wildlife related components of the project.

For further questions or concerns, please reach out to the following FWP personnel:

Caleb Uerling, Region 2 Fisheries Biologist (phone: 406-493-2694, email: caleb.uerling@mt.gov)

Vanna Boccadori, Wildlife Biologist (phone: 406-494-2082, email: vboccadori@mt.gov)

Jen Smitham, R3 Public Comment Coordinator (phone: 406-495-3262, email: jsmitham@mt.gov)

Sincerely,



Marina Yoshioka
Region 3 Supervisor