



Tim Lahey
Butte District Ranger
Beaverhead Deerlodge National Forest
1820 Meadowlark Lane
Butte, MT 59701

Re: Basin Creek – Butte Watershed Project #63295
Submitted electronically

June 20, 2023

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association) and our members in response to the public comment period for the Basin Creek – Butte Watershed Project #63295 (hereinafter “the project”).

I. Organizational Background

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana and our more than 3,500 members are invested in the ecological integrity and quiet recreation opportunities on public lands across Montana, as well as the impact of climate change on Montana’s wild places. Wild Montana has approximately one hundred member households in Silver Bow County, and countless more members and supporters who visit the wild public lands of southwest Montana for hiking, biking, hunting, angling, foraging, camping, wildlife watching, and more.

Our members and supporters who live in Butte, as well as those who visit, depend on the Basin Creek Municipal Watershed as the primary source of drinking water for our city. The existing treatment plant in the project area was constructed in 2017, both to ensure Butte’s municipal water supply meets Environmental Protection Agency



requirements and to reduce strain on the Big Hole River where the city of Butte has senior water rights.

II. Comments

While the Forest cannot and should not seek the wholesale elimination of wildfire in the area, this project seeks to strategically reduce the risk of a high intensity fire that would pose a substantial risk to the proper function our water supply. Ensuring the forested lands that surround the municipal reservoir and in the larger watershed are healthy and resilient will help protect our city's water source.

We greatly appreciate the environmental assessment's focus on prescribed burning as a critical component of the proposed treatments. It is widely recognized that coupling mechanical thinning with prescribed burns is the best way to foster forest resiliency, bringing much-needed low intensity fire back into the landscape in a controlled manner. Increasing ecological integrity by reintroducing fire is just as essential to protecting the reservoir as thinning. We encourage the Forest to utilize prescribed burning wherever possible in this project to best mimic natural forces that will increase forest health, thus protecting the reservoir.

As noted above, this reservoir was created to reduce Butte's pull on the Big Hole River. Wild Montana and our members have a special interest in the Big Hole River and surrounding public lands. The Big Hole is arguably one of Montana's most iconic rivers, but also one of its most imperiled. A severe, high intensity fire in the watershed would compromise the treatment plant, forcing Butte to use its water rights on the Big Hole to provide essential municipal water to the city's residents and businesses. Such a call on the Big Hole would be catastrophic for the already stressed fish populations and agricultural uses that rely solely on the Big Hole. One of this project's most notable indirect effects is to prevent such a strain on the Big Hole River and we appreciate the Forest's detailed consideration of this indirect impact.

Butte is incredibly lucky to have some of the best water in the state in our taps. That water comes directly from these national forest lands. Fire is a necessary, natural ecological function that for too long, has been absent from this watershed, contributing to the increased risk of a high intensity fire that could drastically impair Butte's municipal



water supply. The Basin Creek Project's analysis acknowledges the role fire plays in healthy forests and properly scales the thinning and prescribed burning treatments to help restore healthier forest lands surrounding the reservoir, protecting Butte's municipal water from intense and adverse impacts of a high severity wildfire.

Sincerely,

Aubrey Bertram
Staff Attorney, Climate and Energy Director
Cell: (303) 956-5263
Email: abertram@wildmontana.org
80 S. Warren St.
Helena, MT 59601