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First name: Bo

Last name: Walker

Organization: Beaverhead-Deerlodge Working Group

Title: Group Facilitator

Comments: Comment letter regarding the Basin Creek-Butte Watershed Environmental Assessment (Project 63295)

The Beaverhead-Deerlodge Working Group (BDWG) is an independent group that works collaboratively on issues relevant to the Beaverhead-Deerlodge National Forest, the surrounding lands and communities. The BDWG does not include Forest Service employees and is not utilized or directed by the Forest Service.

This is a comment letter pursuant to the EA for the Basin Creek/Butte Watershed project. Members of the BDWG group use the project area in various ways, not the least of which is consuming water that is provided to Butte from the watershed.

The BDWG wants to convey three points: the importance of the Basin Creek-Butte Watershed, the need for urgency and the need for a landscape-scale project.

The importance of the Basin Creek Watershed

The Basin Creek Municipal Watershed is the primary (up to nearly 60%) source of drinking water for the Butte area, supporting nearly 35,000 people. The Basin Creek Treatment Plant was completed in 2017 at a cost of over \$30 million. The treatment plant ensures that EPA standards are met and has the secondary benefits of saving energy and reducing withdrawals from the Big Hole River. A major wildfire in the watershed could render the plant inoperable and Butte's most productive and economical water supply would likely be rendered unusable and full recovery could take a decade or more. If the Basin Creek Supply were unavailable for 10 years, the total estimated increase in power costs alone are estimated to up to \$4.3 million and the total costs associated with recovery could be much higher.

The need for urgency

Every summer that passes is a "roll of the dice" in terms of a possible ignition occurring either in the project area or upwind of it. Summer lightning storms are a common occurrence in the area, and the current fuel loads in the both the project area and proximate acres are likely to create fire behaviors that would create uncharacteristically severe impacts and represent a level of risk that would greatly constrain options for initial attack/suppression. These risks are exacerbated by the prevailing winds from the southwest and complicated even more by the location of IRAs. The results of a major fire in the area could greatly impact the function of the watershed as a source of drinking water. The water district might then be forced to exercise its water right on the Big Hole River, which is a highly valued trout fishery and the source of water for other users. The loss of Basin Creek drainage as a functional municipal watershed would have impacts that go far beyond the project area.

The need for a landscape-scale project

Current fuel levels and the extensive insect-caused mortality in and around the project area mean that projects that reduce fuels in relatively small and isolated units are likely to inadequately address the scale of the wildfire risk. They are unlikely to substantially reduce the ignition risk of a significant wildfire, and in the event a fire does occur, they are unlikely to substantially alter fire behavior. It is therefore important that the project occur at the landscape scale in order to meaningfully alter the risk

profile. Such a landscape-scale approach appears likely to require the use of mechanical harvest in Inventoried Roadless Areas (IRAs). The portion of the watershed that is designated IRA is too large and the mortality-created fuels too extensive to rely upon non-mechanized approaches such as hand crews and pile & burning. Recognizing that hand treatments may be utilized to accomplish the purpose and need of the project, safety concerns also argue for minimizing those risks when mechanical treats are a reasonable option. The BDWG recognizes that the IRA designation exists to identify land with some level of wilderness attributes/potential and encourages the Forest Service to analyze reasonable and feasible measures to minimize the potential impacts of fuels reduction in those areas. But failure to meaningfully reduce the fuels in the IRA will not adequately address the current landscape-scale wildfire risks to the watershed. Treating only the non-IRA acres would simply be too little too late.

There appears to be a window of opportunity for fuel treatment in the Basin Creek-Butte Watershed. Local elected officials and Montana's Congressional delegation have recognized this need. Federal funding appears higher than in previous years. Large fires across the western states have increased public awareness of the potential for landscape-scale wildfires that threaten health and safety. Wildfire is a priority issue as it has rarely been in the past.

The Beaverhead-Deerlodge Working Group supports Forest Service's efforts to analyze and respond to wildfire risks in the project area.

Signature page appended (submitted as attachment).