



# Montana Fish, Wildlife & Parks

## FINAL ENVIRONMENTAL ASSESSMENT AND DECISION NOTICE FOR THE REMOVAL OF NON-NATIVE BROOK TROUT WITH PISCIDES AND STOCKING OF WESTSLOPE CUTTHROAT IN CHICAGO GULCH CREEK

July 11, 2012

### **Proposed Actions:**

Montana Fish, wildlife and Parks (FWP) has proposed a project to facilitate westslope cutthroat trout (WCT -*Oncorhynchus clarkii lewisi*) conservation in central Montana. Genetically pure WCT occupy about 8% of their historical range in the western United States and less than 4% of their historical range in northcentral Montana within the Missouri River Drainage. The Flatwillow/Box Elder Drainage in Montana currently supports two populations of non-hybridized WCT in a total of less than five miles of stream. This project is intended to increase the amount of stream occupied by genetically pure WCT (an increase of approximately 50 percent in the Flatwillow/Box Elder Drainage). If implemented as proposed, this project would protect and expand a unique pure population of westslope cutthroat trout and lower the overall risk of extinction of westslope cutthroat trout in this Drainage. This project would also help achieve the goal and objectives listed in the statewide Conservation Agreement (2007) for the restoration of westslope cutthroat trout. Projects which restore WCT to their historical habitat would help prevent future listing under the Endangered Species Act and potential imposition of federal regulatory restrictions.

### **Public Involvement:**

In compliance with the Montana Environmental Policy Act, an environmental assessment was prepared and circulated for public comment starting May 3, 2012. A summary letter describing the draft EA was circulated to the standard FWP R-4 contact list. A scoping letter, which included a project summary and area map was mailed to 31 local landowners, conservation groups, non-governmental, and government organizations. Emails were also sent to local groups. Copies of the Environmental Assessment were available at the FWP Region Lewistown office, on request and the FWP internet web site. FWP met with one downstream landowner and ranch manager. Due to unforeseen circumstances the links in the FWP posting did not function properly between 5/1 and 5/29; as a result, the comment period was extended until 6/18/2012. A second mailing/emailing was sent regarding the extension. Six comment emails, one letter and two verbal comments were received during the comment period. Five of the comment emails were in complete support of the project. One verbal comment did not support the project due to costs and elimination of brook trout. One verbal comment was concerned about impacts on grazing at the downstream end of the project area and one was concerned about impacts on the household well. The letter was from a 75 member

organization in complete support of the project. The following are responses to those public comments.

**Email comment 5/7/12 - This is a creek that does not run year round, but only a couple months out of the year.**

**Response:** Chicago Gulch Creek does run year round in the headwaters. It goes sub surface downstream of the project during most of the year. The seasonal barrier and prairie fish assemblage downstream from the treatment section make Chicago Gulch an excellent candidate for the establishment of a WCT population.

**Email comment 5/7/12 - What does it hurt to have non native brook trout in this stream? I think it is a waste of money and time to worry about a little fish in a little stream that is not hurting anything.**

**Response:** WCT are found in less than 4% of their range in the Missouri River drainage. Westslope cutthroat trout (*Oncorhynchus clarki lewisi*) is considered one species. However, genetic research by Allendorf, F. W. and R. F. Leary published in 1988 has shown that “much of the genetic variation within the WCT results from alleles found in only one or two local populations, but they often occur at high frequencies in those populations. Thus, preserving the genetic variation in westslope cutthroat trout entails preserving as many local populations as possible.” Preserving as many of the WCT as possible is a priority and necessary to prevent extinction and the loss of potentially rare adaptations. Chicago Gulch presents a rare opportunity to preserve WCT without construction a costly barrier to protect the westslope cutthroat trout from downstream fish populations. The presence of a brook trout population in the same stream is incompatible with maintaining a westslope cutthroat trout population over the long term since brook trout will dominate and replace or successfully outcompete the cutthroat trout population, driving it to extinction. In the Flatwillow/Box Elder Creek basin, there are approximately 122 miles of stream that support brook trout available for angling. This project would increase occupied westslope cutthroat habitat from approximately 7 miles to 11.5 miles and decrease brook trout habitat to about 117 miles of stream, a minor reduction.

**Verbal comment – “I am concerned about my cows at the lower end of project area.”**

**Response:** FWP and other agencies will work with local landowners and lessees to prevent impacts to their operations.

**Verbal comment – “ Our property has a well is very close to Chicago Gulch and I am worried about our grand kids health.”**

**Response:** Case studies in Montana have concluded that rotenone movement through groundwater does not occur. For example, at Tetrault Lake, Montana, neither rotenone nor inert ingredients were detected in a nearby domestic well, which was sampled two and four weeks after applying 90 ppb rotenone to the lake. This well was chosen because it was down gradient from the lake and also drew water from the same aquifer that fed and drained the lake. In 1998, a Kalispell area pond was treated with Prenfish 5% rotenone. Water from a well, located 65 feet from the pond, was analyzed and no sign of rotenone was detected. In 2001, another Kalispell area pond was treated with Prenfish

5% rotenone. Water from a well located 200 feet from that pond was tested four times over a 21 day period and showed no sign of contamination. In 2005, FWP treated a small pond near Thompson Falls with Prenfish to remove pumpkinseeds and bass. A well located 30 yards from the pond was tested and neither Prenfish nor inert ingredients were found in the well (Don Skaar, personal communications). Though impacts to groundwater have been shown to be non-existent, FWP will provide drinking water for the period during and immediately after the treatment. We will also take samples of well water before and during the treatment if requested.

**Decision:**

Based on the Draft Environmental Assessment, public comment and the currently high risk of extinction of WCT in the Missouri Drainage, it is my decision to proceed with Alternative 2, the proposed action. Alternative 2 involves removal of an existing fish population of brook trout. Removals will involve piscicides. The Draft Environmental Assessment, together with this decision notice, will serve as the Final Environmental Assessment document for this proposal. This alternative provides the best opportunity to benefit the conservation and restoration of WCT, helps relieve ESA listing pressure and also serves to illustrate the State's commitment to perpetuating native fish species. This project will help preserve WCT in the Missouri River drainage by replication of WCT populations obtained from nearby drainages. I find there to be no significant impact on the human or physical environment except to help ensure the long-term persistence of pure WCT in the Missouri River drainage. Therefore I conclude the Environmental Assessment is the appropriate level of analysis and that an Environmental Impact statement is not required.

  
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**Gary Bertelotti**  
**Region 4 Supervisor**  
**Great Falls, MT**

  
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**Date**