



September 30, 2020

Jamie Tripp and Molly Ryan, District Rangers
Beaverhead-Deerlodge
National Forest, 420 Barrett St.
Dillon, MT 59725

Subject: Comments regarding the Selway-Saginaw Vegetation Management Project

Dear Rangers Tripp and Ryan,

The Montana Department of Environmental Quality (DEQ) appreciates the opportunity to comment on the proposed Selway-Saginaw Vegetation Management Project. These comments from the Watershed Protection Section are intended to promote water quality improvement to meet the goals of the Federal Clean Water Act and Montana Water Quality Act. The Beaverhead-Deerlodge National Forest is an important partner for doing this work with a shared goal within the Forest Plan to meet State water quality standards and beneficial uses. To this end, these comments are directed at the current water quality issues within the project area and practices to restore and maintain them.

The following streams have been identified as impaired by the state of Montana by multiple pollutant and non-pollutant causes, meaning they no longer meet State water quality standards. Impairment causes include:

- **Bloody Dick Creek** – Aluminum, Lead, Total phosphorous
- **Selway Creek** - Alteration in stream-side or littoral vegetative covers, Sedimentation/siltation, Total phosphorous
- **Governor Creek** – Alteration in stream-side or littoral vegetative covers, Copper, Flow Regime Modification, Flow Regulation-modification, Other anthropogenic substrate alterations, Physical substrate habitat alterations, Sedimentation-Siltation
- **Big Hole River (headwaters to Pintlar Creek)** - Alteration in stream-side or littoral vegetative covers, Flow Regime Modification, Sedimentation-Siltation, Temperature

Pollutant impairments in Governor Creek and the upper Big Hole River are described in the 2009 *Upper and North Fork Big Hole River Planning Area TMDLs and Framework Water Quality Restoration Approach*. The sediment TMDLs for Governor Creek and the upper Big Hole River in this document identify bank erosion and upland areas as the primary sources of sediment but also calls for a 32% and 29% reduction in sediment, respectively, from unpaved roads. Proper road BMPs along with healthy and abundant riparian vegetation is necessary to meet these reductions. Bloody Dick and Selway Creeks are in the Red Rock TMDL planning area, where TMDL development is currently underway. While DEQ has not established load allocations on these streams the same practices discussed in the Big Hole TMDL apply.

The purpose and need for this project describe timber management, vegetation, and fire management as the primary focus. These goals and objectives affect water quality and we encourage full consideration of aquatic resources goals and objectives from the Forest Plan as well.

We support the Connected Actions for Watershed Restoration and Road Management. Removing unpaved roads from the floodplain can reduce direct sediment loading and improve stream function, which can also reduce streambank erosion. In combination with additional road BMP implementation and maintenance described in the scoping documents, these actions can significantly reduce sediment loading. However, those practices need to be implemented properly. We encourage the use of experienced contractors and oversight from staff so that these BMPs and other actions are effective in reducing sediment loading.

DEQ appreciates the Beaverhead-Deerlodge National Forest as a partner in fulfilling the Clean Water Act and its goal of meeting and exceeding water quality standards. Projects like this can be an important step in reaching that goal. The Watershed Protection Section can provide technical or financial support to help implement BMPs or additional restoration practices that can protect and restore water quality.

Thank you for the opportunity to comment on the Selway-Saginaw Vegetation Management Project. Please contact Eric Trum, Water Quality Specialist (etrum@mt.gov, 406.444.0531) for further communications regarding this project.

Sincerely,



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