Bitterroot National Forest

1801 N. First Street

Hamilton, MT 59840

September 15, 2023

To Matthew Anderson, Forest Supervisor

The following letter is the Bitterroot River Protection Association’s (BRPA) response to the Bitterroot National Forest’s (BNF) request for public comment on the Draft Environmental Analysis of the Bitterroot Front Project.

BRPA representatives attended every pre-scoping public meeting in each of the communities held in 2019. We noticed that in each meeting tables were set up addressing various resource management activities such as recreation, road management, vegetative management, fuels reduction, etc. in which the public was allowed to discuss with agency specialists their concerns about the potential impacts of such practices on the forest’s resources. Given that our organization is focused upon the health of our watershed we noticed that there were no hydrologists present at any of the meetings except the last one held in Hamilton.

That was our only chance to discuss with an agency professional our concerns about the potential of any negative impacts on the watershed. The hydrologist at the table agreed that any land management project with streams running through it posed potentially negative impacts on the water resource and that water quality monitoring was a vital element in such projects.

BRPA offered our assistance in implementing such monitoring on the Bitterroot Front. After consultation with the Forest Supervisor and a staff meeting with hydrologists and other officials BRPA joined with the BNF in a Memorandum of Understanding which states in part:

It is the U.S. Forest Service's policy to inform the public as fully as possible of its programs and activities. BRPA are encouraged to give public notice of the receipt of this agreement and, from time to time, to announce progress and accomplishments. Press releases or other public notices should include a statement substantially as follows:

"The Bitterroot National Forest of the U.S. Forest Service, Department of Agriculture, have partnered with the Bitterroot River Protection Association to conduct water quality monitoring on Bitterroot National Forest system lands within the Bitterroot River Basin. "

Based on this shared goal BRPA succeeded in gaining the cooperation and support of the Montana Department of Natural Resources and Conservation, the Montana Department of Environmental Quality, the Ravalli County Commissioners, the Bitterroot Conservation District, other non-profit organizations and some businesses and community members with a shared interest in the watershed and applied for a $35,000 grant aimed at implementing a water quality and quantity monitoring project including fifteen streams across the Bitterroot Front project area. The full budget for the project came to just under $100,000.

To meet the roughly $100,000 project budget, BRPA put together a package of committed funds, state grants (including the DNRC grant) and volunteer labor, totaling around $64,000. This left our application with a total of $36,000 in uncommitted funds and without a commitment from the landowner and project sponsor. This may be a factor in why, out of the 22 grants approved for funding by DNRC, we were ranked 22nd, at the bottom of the list, and the amount of money in the fund that year did not stretch that far.

You can imagine our disappointment upon reading the recently released Draft EA that BRPA was not even mentioned in the list of partners/collaborators for the project. Nor was there any mention of a water quality/quantity monitoring component.

It seems that given the extent of support from state and local government, local organizations, businesses and individuals in the community shown to date that it would be a shame to have the proposed water monitoring project not come to fruition due to lack of commitment and support from the landowner and project sponsor, that is the Bitterroot National Forest.

The value, indeed, the need for such monitoring, especially on a project of such scale was recognized by the BNF hydrologist at the time. This would be a great opportunity to get what agency needs for 1/3 the cost thanks to local support. It would be a great savings on your part for something that we believe is inherently necessary to your proposed project.

We believe in general that any proposed project that could impact water quality should be monitored. The monitoring should begin before the project is begun in order to gather baseline data. It should continue throughout the project activity and be checked again afterwards.

If no water quality monitoring is included in the final EA we would feel obliged to object.

BRPA also has concerns about the lack of information in the Draft EA related to the various treatments being proposed (such as the volume of timber you propose to remove from specific areas, for instance). The lack of a budget showing estimated costs and expenses for the whole project is also disturbing.

Thanks for considering our comments,

Michael Howell, Executive Director

Bitterroot River Protection Association