March 29, 2024

Amanda Milburn
Lolo National Forest Supervisors Office
24 Fort Missoula Road
Missoula, MT 59804

Subject: Support and recommendations for the Lolo Management Plan Revision Proposed Action

Dear Amanda Milburn,

The Montana Department of Environmental Quality (DEQ) appreciates the opportunity to comment on the Lolo Management Plan Revision Proposed Action. Specifically, DEQ Nonpoint Source and Wetlands Section is providing comments on this effort as it relates to water quality within the project area and the current selected priority watersheds.

DEQ supports the watershed activities planned in the Lolo National Forest Land Management Plan Proposed Action. Supporting "regulatory requirements, as well as the continued delivery of restoration efforts and the associated positive trend in the watershed conditions in the Lolo National Forest" helps meet the goals of the Clean Water Act and the Montana Water Quality Act. As a large landowner charged with protection of streams and maintenance and restoration water quality standards within Forest Service boundaries, the Lolo National Forest is an important partner for water quality statewide.

Priority watersheds selected within the Lolo Management Plan include West Fork Lolo Creek, East Fork Lolo Creek and Granite Creek. Water quality impairments on these streams include sediment and alternation in stream-side vegetation cover related to erosion, forest roads and Highway 12. Full support of a cold-water fishery and aquatic life are the primary goals in the Upper Lolo Creek TMDL Planning Area Document[1]. A 33% reduction in sediment load coming from all roads in the West Fork Lolo Creek watershed is proposed by incorporating best practices that reduce road surface runoff and sediment delivery to stream channels. To reach this, the Lolo National Forest should ensure that the following TMDL priority restoration actions are included in all work within the Upper Lolo region:

- Upgrade or relocate forest roads to meet Montana Forestry BMPs[2]
- Recontour and revegetate forest roads that are surplus to the needs of forestry managers
- Improve inspection and maintenance of existing culverts

[1] Montana DEQ. 2003. Water Quality Restoration Plan and Total Maximum Daily Loads for the Upper Lolo Creek TMDL Planning Area. https://deq.mt.gov/files/water/wqpb/CWAIC/TMDL/C05-TMDL-01a.pdf
[2] Montana DNRC. 2015. Montana Forestry Best Management Practices. https://dnrc.mt.gov/_docs/forestry/FinalBMP_VersionForWeb10_1_15.pdf

- Implement Montana Forestry BMPs on all timber harvest operations
- Upgrade undersized culverts to accommodate large floods
- Reduce sediment delivery from Highway 12 through improved used and maintenance of sediment traps, plowing techniques, and guardrail cleaning
- Correct priority fish passage barriers that are affecting the connectivity of native fish habitats

The Lolo Creek Watershed Restoration Plan was completed in 2013 and may assist in watershed prioritization, best practices, pollutant loading, monitoring plans, and overall planning and efforts to make meaningful water quality improvements. We encourage and applaud the work you have done to work with all partners and stakeholders in this effort.

Another overlapping area of concern includes Petty Creek, which is impaired by sediment, temperature, low flow alterations, and alteration in streamside vegetation cover. To reduce pollutant loads and meet goals listed in the Central Clark Fork Basin Tributaries TMDLs and Water Quality Improvement Plan[3], the Lolo National Forest should include the following restoration actions in all projects in that area:

- Restore and improve riparian and wetland vegetation to decrease bank erosion and reduce pollutant delivery from upland sources
- Improve grazing and land management by utilizing riparian fencing, off-site watering, appropriate grazing density and duration
- Restore instream channel and habitat restoration where necessary.
- Increase riparian shade, use water conservation measures to maximize water left in the stream, restore over-widened portions of the stream, and work to maintain conditions where targets are currently met.

The Central Clark Fork Tributaries Watershed Restoration Plan is in progress, and we encourage you to collaborate with the lead, Vicky Watson (vicki.watson@mso.umt.edu) on goals and implementation strategies. This will also aid in leveraging funding and capacity for water quality restoration efforts.

DEQ requests that the Lolo National Forest reports on the best practices that are ultimately implemented on the Forest and within the priority watershed areas. If all reasonable soil and water conservation practices are implemented, DEQ may consider prioritizing reassessment of the sediment temperature, and alternation impairments to determine if water quality standards are met. Beyond an accounting of best practices implemented, developing, and implementing a comprehensive monitoring plan that demonstrates water quality status before and after implementation would build an especially convincing case.

The type of restoration actions recommended for the Lolo and Petty Creek priority watersheds should be considered whenever forest actions occur in a watershed with water quality impairments. Restoration actions should be prioritized equally for streams with completed TMDL documents as with streams that do not yet have completed TMDL documents, or where the impairments do not require completion of a TMDL. Even if forest actions are not intended to address water quality, actions may be adapted to include water quality co-benefits. For example, vegetation management and fire mitigation projects could use wood from thinning activities to add woody debris to streams with sediment or

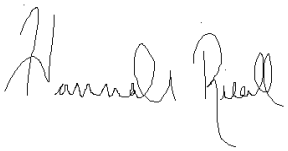
[3] Montana DEQ. 2014. Central Clark Fork Basin Tributaries TMDLS and Water Quality Improvement Plan. https://deq.mt.gov/files/water/wqpb/CWAIC/TMDL/COL-TMDL-01a.pdf

streamside habitat impairments. In-stream woody debris can restore sediment transportation dynamics, decrease erosion, and create fish habitat. Streams with streamside habitat impairments may be lacking woody vegetation that could fall into the stream channel.

As future priority watersheds will be determined throughout the life of the Lolo National Forest Plan and usually on a 10-year rotation basis, DEQ requests to participate in that selection and help meet all water quality planning goals and requirements.

DEQ appreciates the Lolo National Forest as a partner in fulfilling the Clean Water Act and its goal of meeting and exceeding water quality standards. This planning effort is an important part of that. The Water Quality Planning Bureau can provide further technical or financial support to help implement best practices that can protect and restore water quality. Thank you for the opportunity to support this effort. Please contact me for further communication regarding this project.

Sincerely,



Hannah Riedl
Nonpoint Source and Wetlands Section Supervisor
Water Quality Planning Bureau
Montana Department of Environmental Quality
406.444.0549, Hannah.Riedl@mt.gov