July 24, 2024

Kathy Bushnell
Helena Ranger District
Helena-Lewis and Clark National Forest
2880 Skyway Drive
Helena, MT 59602

Subject: Support and recommendations for Larabee Hat Vegetation Project

Dear Kathy Bushnell,

The Montana Department of Environmental Quality (DEQ) appreciates the opportunity to comment on the proposed Larabee Hat Vegetation Project. Specifically, the DEQ Nonpoint Source and Wetlands Section is providing comments on this project as it relates to water quality.

DEQ supports the proposed activities in this project that protect and restore water quality, helping meet the goals of the Clean Water Act and Montana Water Quality Act. The Helena-Lewis and Clark 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.

Water Quality Impairments
Within the project area, DEQ has identified the following water quality impairments:

Elliston Creek
- Alteration in stream-side or littoral vegetative covers
- Sedimentation/Siltation

Little Blackfoot River
- Alteration in stream-side or littoral vegetative covers
- Aluminum
- Arsenic
- Cadmium
- Copper
- Cyanide
- Lead
- Sedimentation/Siltation

Trout Creek
- Sedimentation/Siltation

These impairments are discussed in the Little Blackfoot River Watershed TMDLs and Framework Water Quality Improvement Plan (2011) and the Little Blackfoot River Watershed TMDLs and Framework Water Quality Improvement Plan – Metals Addendum (2014). Impacts from abandoned mine lands, livestock grazing, silviculture harvesting, channelization, and roads/development have been identified as the probable sources of these impairments.

In 2016, Trout Unlimited developed the Little Blackfoot River Watershed Restoration Plan (WRP) to help guide on-the-ground restoration efforts in the Little Blackfoot River and its tributaries. To restore Elliston Creek, the WRP calls for efforts to increase year-round flows, reduce grazing pressure in the riparian area,

and improve overhead vegetative cover. DEQ believes the proposed willow planting, fencing, and installation of barriers to protect streambanks from cattle overuse (page 6 of the Larabee Hat Vegetation Project Preliminary Assessment) will make a help achieve restoration goals in Elliston Creek. To restore Trout Creek, the WRP calls for actions that will increase woody vegetation in the riparian area and improve bank stability. DEQ believes the proposed willow planting and installation of temporary fencing (page 6 of the Larabee Hat Vegetation Project Preliminary Assessment) will help achieve restoration goals in Trout Creek.

DEQ recognizes the importance of fire on the landscape. The proposed project includes a mosaic of prescribed fire treatments. While fire can increase sediment loading to streams and reduce riparian vegetative cover, these impacts tend to be short duration and low severity during a well-managed prescribed burn, as opposed to the long-term, sometimes catastrophic destruction that comes on the heels of uncontrolled, stand-replacing fires that can occur when fuels go unmanaged for many years.

Recommendations

To protect and improve water quality, DEQ recommends the following actions be taken during implementation of the proposed project.

Preventing Mine Waste from Reaching State Waters

Land management activities that remove vegetative cover, such as prescribed burns and timber harvesting can increase surface runoff and encourage soil erosion. In areas where waste rock dumps, tailings piles, and other potentially contaminated relics of abandoned mines still exist on the landscape, surface runoff can carry pollutants into streams. Where appropriate, please consider installing berms or ditches to divert surface runoff water runoff away from known sources of heavy metals and other contaminants.

Protecting and Restoring Wetlands and Riparian Areas

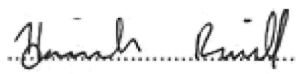
DEQ applauds the Forest Service's proposed efforts to reduce invasive weeds and install protective woody debris to improve and protect wetlands within the project area. From an ecologic and a human health and safety standpoint, these areas have an outsized impact on our environment. Please continue to look for additional opportunities to protect and restore these valuable and vulnerable resources. DEQ recommends state and federal land management agencies work closely with local conservation partners to bring additional technical and financial resources to the table to assist in this work.

Reporting

DEQ appreciates the Helena-Lewis & Clark National Forest as a partner in achieving the goals of the Clean Water Act to ensure all waters meet water quality standards and support their designated beneficial uses. To track progress, DEQ respectfully requests a copy of any report that may be produced documenting installation of best practices as a result of the Larabee Hat Vegetation Project.

Thank you for the opportunity to support the Larabee Hat Vegetation Project. Please contact me for further communication regarding this project.

Sincerely,



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