Comments via the portal at:
https://cara.fs2c.usda.gov/Public//CommentInput?Project=56536
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February 5, 2025

Mr. Christopher Prew
Flathead National Forest Supervisor's Office
650 Wolfpack Way, Kalispell, MT 59901.

Dear Flathead National Mr. Prew,

Please accept the following public comments relating to the proposed Flathead National Forest's Comprehensive River Management Plan (hereinafter, "River Plan") for the Three Forks of the Flathead River from me on behalf of the Alliance for the Wild Rockies, Council on Wildlife and Fish,, and Native EcosystemsCouncil.

The actions being proposed are inaccurate and incomplete, and far exceed the limits of acceptable adverse environmental impacts, and will fail to meet the minimum legal requirements of Section 3(d)(1) of the Wild and Scenic Rivers Act ("Act"). The proposed River Plan is neither "comprehensive," nor will it "enhance" or provide the minimum legal "protection of river values" required by the Act.

The operation, enforcement of Plan standards, user threshold levels and planning, have been in non-compliance with the Act since the early 1980s.

The Flathead National Forest failed to analyze and disclose what baseline ecological, biological, scenic, spiritual, economic and socio-cultural values were at the time the Flathead River (all 3 forks) was established as a national treasure with the 1976 Wild and Scenic River designation in violation of NEPA, APA, ESA and the Clean Water Act.

These values we have noted above are defined in the Wild and Scenic River Act as Outstanding Remarkable Values (ORVs). In other words, the proposed River Plan has arbitrarily and capriciously narrowed the role and scope of Section 3(d)(1).
NEPA and the Act both require that the agency conduct a broad, interactive, interdisciplinary, co-creative, open-public process to fully analyze, thoroughly discuss in a public arena, and disclose all relevant data and studies to the general public without holding back important information or ignoring public comments that don't fit presumptions/assumptions made prior to NEPA scoping. This proposal has, unfortunately, fallen far short of the minimum legal requirement we have outlined above.

Please compare the 1976 baseline conditions, which according to the Act are to be "maintained and enhanced." To the proposed action. Do not do so is a violation of the Wild and Scenic Rivers Act, the Clean Water Act, ESA, and NEPA's purpose and intent.

Float trips have significantly added to fishing pressure. Plus, commercial tourism (various special-use river permits) is out of control. How is this effecting bull trout?

The EIS must fully and completely analyze the impacts to bull trout critical habitat and westslope cutthroat trout habitat. What is the standard for sediment in the Forest Plan? Sediment is one of the key factors impacting water quality and fish habitat. [See USFWS 2010]

The introduction of sediment in excess of natural amounts can have multiple adverse effects on bull trout and their habitat (Rhodes et al. 1994, pp. 16-21; Berry, Rubinstein, Melzian, and Hill 2003, p. 7).
The effect of sediment beyond natural background conditions can be fatal at high levels. Embryo survival and subsequent fry emergence success have been highly correlated to percentage of fine material within the stream-bed (Shepard et al. 1984, pp. 146, 152). Low levels of sediment may result in sublethal and behavioral effects such as increased activity, stress, and emigration rates; loss or reduction of foraging capability; reduced growth and resistance to disease; physical abrasion; clogging of gills; and interference with orientation in homing and migration (McLeay et al. 1987a, p. 671; Newcombe and MacDonald 1991, pp. 72, 76, 77; Barrett, Grossman, and Rosenfeld 1992, p. 437; Lake and Hinch 1999, p. 865; Bash et al. 2001n, p. 9;
Watts et al. 2003, p. 551; Vondracek et al. 2003, p. 1005; Berry, Ru-binstein, Melzian, and Hill 2003, p. 33). The effects of in-

creased suspended sediments can cause changes in the abundance and/or type of food organisms, alterations in fish habitat, and long-term im- pacts to fish populations (Anderson et al. 1996, pp. 1, 9, 12, 14, 15;
Reid and Anderson 1999, pp. 1, 7-15). No threshold has been determined in which fine sediment addition to a stream is harmless (Suttle et al. 2004, p. 973). Even at low concentrations, fine-sediment deposition can decrease growth and survival of juvenile salmonids.Aquatic systems are complex interactive systems, and isolating the effects of sediment to fish is difficult (Castro and Reckendorf 1995d, pp. 2-3). The effects of sediment on receiving water ecosystems are complex and multi-dimensional, and further compounded by the fact that sediment flux is a natural and vital process for aquat- ic systems (Berry, Rubinstein, Melzian, and Hill 2003, p. 4). Environmental factors that affect the magnitude of sediment impacts on salmonids include duration of exposure, frequency of exposure, toxicity, temperature, life stage of fish, angularity and size of particle, severity/magnitude of pulse, time of occurrence, general condition of
biota, and availability of and access to refugia (Bash et al. 2001m, p.11). Potential impacts caused by excessive suspended sediments are varied and complex and are often masked by other concurrent activities (Newcombe 2003, p. 530). The difficulty in determining which environmental variables act as limiting factors has made it difficult to establish the specific effects of sediment impacts on fish (Chapman 1988, p. 2). For example, excess fines in spawning gravels may not lead to smaller populations of adults if the amount of juvenile

winter habitat limits the number of juveniles that reach adulthood.

Often there are multiple independent variables with complex interrelationships that can influence population size.

The ecological dominance of a given species is often determined by environmental variables. A chronic input of sediment could tip the ecological balance in favor of one species in mixed salmonid populations or in species communities composed of salmonids and non-salmonids (Everest et al. 1987, p. 120). Bull trout have more spatially restrictive biological requirements at the individual and population levels than other salmonids (USFWS (U.S. Fish and WildlifeService) 1998, p. 5). Therefore, they are especially vulnerable to environmental changes such as sediment deposition.

Aquatic Impacts

• Classify and analyze the level of impacts to bull trout and westslope cutthroat trout in streams, rivers and lakes from sediment and other habitat alterations:

Lethal: Direct mortality to any life stage, reduction in egg-to-fry survival, and loss of spawning or rearing habitat. These effects damage the capacity of the bull trout to produce fish and sustain populations.

Sublethal: Reduction in feeding and growth rates, decrease in habitat quality, reduced tolerance to disease and toxicants, respiratory impairment, and physiological stress. While not leading to immediate death, may produce mortalities and population decline over time.

Behavioral: Avoidance and distribution, homing and migration, and foraging and predation. Behavioral effects change the activity patterns or alter the kinds of activity usually associated with an unperturbed environment. Behavior effects may lead to immediate death or population decline or mortality over time.
Direct effects:
Gill Trauma - High levels of suspended sediment and turbidity can result in direct mortality of fish by damaging and clogging gills (Curry and MacNeill 2004, p. 140).
Spawning, redds, eggs - The effects of suspended sediment, deposited in a redd and potentially reducing water flow and smothering eggsor alevins or impeding fry emergence, are related to sediment particle sizes of the spawning habitat (Bjornn and Reiser 1991, p. 98).
Indirect effects:
Macroinvertebrates - Sedimentation can have an effect on bull trout and fish populations through impacts or alterations to the macroin-vertebrate communities or populations (Anderson, Taylor, and Balch
1996, pp. 14-15).
Feeding behavior - Increased turbidity and suspended sediment can affect a number of factors related to feeding for salmonids, including feeding rates, reaction distance, prey selection, and prey abundance
(Barrett, Grossman, and Rosenfeld 1992, pp. 437, 440; Henley, Patterson, Neves, and Lemly 2000, p. 133; Bash et al. 2001d, p. 21).

Habitat effects - All life history stages are associated with complex forms of cover including large woody debris, undercut banks, boulders, and pools. Other habitat characteristic important to bull trout include channel and hydrologic stability, substrate composition, temperature, and the presence of migration corridors (Rieman and McIntyre 1993, p. 5).
Physiological effects - Sublethal levels of suspended sediment may cause undue physiological stress on fish, which may reduce the ability of the fish to perform vital functions (Cederholm and Reid 1987, p. 388, 390).
Behavioral effects - These behavioral changes include avoidance of habitat, reduction in feeding, increased activity, redistribution andmigration to other habitats and locations, disruption of territoriality, and altered homing (Anderson, Taylor, and Balch 1996, p. 6; Bash et al. 2001t, pp. 19-25; Suttle, Power, Levine, and McNeely 2004, p. 971).
• How will this project affect native fish? What is the current condition in the riparian areas?
How will this project protect rather than adversely impact fish habitat and water quality?

Muhlfeld, et al. (2009) evaluated the association of local habitat features (width, gradient, and elevation), watershed characteristics (mean and maximum summer water temperatures, the number of road crossings, and road density), and biotic factors (the distance to the source of hybridization and trout density) with the spread of hybridization between native westslope cutthroat trout On-

corhynchus clarkii lewisi and introduced rainbow trout O. mykiss in the upper Flathead River system in Montana and British Columbia.

They found that hybridization was positively associated with mean summer water temperature and the number of upstream road crossings and negatively associated with the distance to the main source of hybridization. Their results suggest that hybridization is more likely to occur and spread in streams with warm water temperatures, increased land use disturbance, and proximity to the main source of hybridization.The EIS or what ever analysis you do must use the best available science to analyze how logging riparian habitat will impact native fish and water quality.

Please see the following article from the 9/25/15 Missoulian disagrees with the Forest Service and says it is habitat destruction causing bull trout declines.
http://missoulian.com/news/local/montana-fwp-biologist-despite-successes-bull-trout-populations-still-in/article_2798e4c6-0658-522f-be4c-4274f903129e.html

Montana FWP biologist: Despite successes, bull trout populations still in peril
Ladd Knotek is disturbed by the lack of attention being paid to the many western Montana streams where bull trout populations are struggling to survive.

The fisheries biologist with Montana Fish, Wildlife and Parks knows people love to latch on to the success stories from streams like Fish Creek and several Blackfoot tributaries, where bull trout populations are viable.

"But what nobody talks about is all these other populations that,50 years ago, these were all viable populations," he said Tuesday as part of a presentation on bull trout in Rattlesnake Creek. "You know, Gold Creek, Belmont Creek, Trout Creek, there's a whole list of them. There's a whole bunch of them that are just basically on the verge ofdisappearing. And what we like to talk about are the ones that are doing OK. But in places like Lolo Creek and some Bitterroot tributaries, bull trout there are just barely hanging on."

Bull trout have faced a long, slow decline over the past century, to the point where they are now listed as a threatened species under the Endangered Species Act. Success is a relative term even in the places where they are doing well.

"They're nowhere near what they were historically," Knotek said of the tributaries where the populations are relatively healthy. "But they have a fair number of adult spawners coming in. People see them in the fishery. But we need to start looking at all these other tributaries that used to be bull trout spawning tributaries and recognize what's going on in the bigger picture. We're just looking at a very thin slice instead of looking at the whole thing. A lot of this

stuff is just symptoms of what's going on at the larger scale. Bull trout are the canary. They're very susceptible to environmental change, whether it's temperature, whether it's physical, whether it's sediment. There's something going on in these drainages and the symptoms we're seeing are the bull trout distribution is shrinking, we're losing populations and we're seeing expansion of nonnatives."

Bull trout – which are native to the Columbia River Basin and are only found west of the Continental Divide inMontana – need clear, cold mountain waters to spawn and require clean gravel beds, deep pools, complex cover, good in-stream flows in the fall and large systems of interconnected waterways for their migrations. Rising temperatures and falling water levels trigger their migration to spawning tributaries in June, and they hang out until they spawn in the fall. They are much more susceptible to warming temperatures and habitat change than nonnative species such as brown and rainbow trout.

Knotek was the featured presenter Friday for a discussion on restoration efforts and the importance of Rattlesnake Creek as a bull trout habitat. The event was organized by the Clark Fork Coalition, a nonprofit in Missoula that aims to protect water quality for the 22,000-square-mile Clark Fork River Basin.

Knotek explained that because Rattlesnake Creek is south-

facing and doesn't have much groundwater recharging, it has much less of a buffer against a warming climate than other streams.

"The water temperatures are significantly higher than they were 10 years ago," he said. "The types of temperatures we're seeing in late summer and early fall, we never saw those 10 to 15 years ago. Water temperature is driving a lot of what we're talking about. It's definitely stressful on fish. It doesn't spell good news for bull trout."Knotek said it's a common misconception that brown trout and rainbows are driving out bull trout, and he explained that those nonnative species are simply moving in because the native species is dying off.

"It's replacement rather than displacement," he said.
In Rattlesnake Creek, biologists have conducted redd counts of the migratory population in the lower reaches since 1999. There is a healthy resident population in the upper reaches, but researchers are more interested in the fish that actually migrate to the Clark Fork River.
The results have been disturbing.

They found a high of 36 in 2006 and 24 in 2008, before Milltown Dam was removed. There was an expected drop to just four redds – spawning beds – after the dam was removed in 2009, because of the massive disturbance. However, the number of redds has not bounced back since,

and researchers found just six last year.

"That tells us that it wasn't just the dam removal that caused it, because they should be recovering by now," Knotek said. "And there are lots of populations like this stream that are not doing well but need more attention. We've got a problem here, but it's not inconsistent with other tributaries. There's something bigger going on."Knotek said that Rattlesnake Creek was historically braided before the area was developed, and that eliminated a lot of the back channels the juvenile fish need to grow.

"You need complexity," he said. "When you have a straight ditch in a system that used to be braided, it ain't good." He's also seen much more algae growth in the upper sections, something that is obviously related to higher temperatures and added nutrients.

"We have browns and rainbows progressing upstream, and we attribute that to water temperature," he said. "That's consistent with other streams, too. It's very obvious something is going on here."
Knotek believes that a "ramping up" of current conservation work is the only thing that can save bull trout populations. Fish screens, the removal of dams, awareness of anglers and water conservation – especially by people using stream irrigation to water their lawns – is crucial.
"Bull trout are the canary," he said. "But there are a lot of

other species that we could be looking at as indicators as well. A lot of research needs to be done. There's a lot of species being affected."

As Knoteck pointed out, bull trout need clear, cold mountain waters to spawn and require clean gravel beds, deep pools, complex cover, good in-stream flows in the fall and large systems of interconnected waterways for their migrations.

How many bull trout will be killed during the implementation of the project?
How will thel project project make the waters clearer in the short term?

How will the R project project make the waters colder in the short term?

How will the Rumbling Owl project project make the gravel beds of the streams int he project area cleaner in the short and long term?

How will the project project make the affect deep pools in streams in the project area in the short and long term?
How will the project project make the affect complex cover over the streams in the project area in the short and long term?

How will the project project make the affect the in-

stream flows in the fall in the short and long term?
How will the project project make the affect large systems of interconnected waterways for bull trout migrations? Critical habitat receives protection under section 7 of the Endangered Species Act through the prohibition against destruction or adverse modification of critical habitat with regard to actions carried out, funded, or authorized by a Federal agency.
Will this project adversely modify bull trout critical habitat in the short run?
How will the project project affect the temperature of
the streams in the project area including bull trout critical habitat?

Please analyze the cumulative effects of the FNF's proposed road building and road use by log truck,
clearcutting, and other logging put more sediment into streams in the project area.

How will this affect bull trout and bull trout critical habitat?
When was the last time the project area was surveyed for bull trout?

What was the results of these surveys?
The Notice of proposed action does not characterize or evaluate the
project area watersheds based on the Watershed Condition Frame-work or the baseline condition developed for bull trout.

We do not know what the current condition of streams are in the project area, i.e., are they functioning acceptably, at risk or at unacceptable risk?
And for what ecosystem parameters? How will this project affect stream function, i.e., degrade, maintain, restore?
• The project relies on BMPs to protect water quality and fish habitat. First, there is no evidence that application of BMPs actually protects fish habitat and water quality.
• Second, BMPs are only maintained on a small percentage of roads or when there is a logging project.
BMPs fail to protect and improve water quality because of the allowance for "naturally occurring degradation." In Montana, "naturally-occurring degradation" is defined in ARM 16.20.603(11) as that which occurs after application of "all reasonable land, soil and water conservation practices have been applied." In other words, damage caused directly by sediment (and other pollution) is acceptable as long as BMPs are applied. The result is a never-ending, downward spiral for water quality and native fish.

Hitt and Frissell showed that over 65% of waters that were rated as having high aquatic biological integrity were found within wilderness-containing subwatersheds.
Trombulak and Frissell concluded that the presence of roads in an area is associated with negative effects for both terrestrial and aquatic ecosystems including changes in species composition and population size. (USFS 2000, pages 3-80-81).

"High integrity [forests] contain the greatest proportion of high forest, aquatic, and hydrologic integrity of all are dominated wilderness and roadless areas [and] are the least altered by management.

"Although precise, quantifiable relationships between long-term trends in fish abundance and land-use practices are difficult to obtain(Bisson et al. 1992), the body of literature concludes that land-use practices cause the simplification of fish habitat." (McIntosh et al1994).
"Land management activities that contributed to the forest health problem (i.e., selective harvest and fire suppression) have had an equal or greater effect on aquatic ecosystems.
If we are to restore and maintain high quality fish habitat, then protecting and restoring aquatic and terrestrial ecosystems is essential." (McIntosh et al 1994).

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Sediment impacts from logging and roadbuilding (and associated poaching and hunting access), plus prescribed burning, plus recreational use in Glacier Park and throughout the project area use numbers and associated increased fishing pressure, and plus climate change, just to name a few obvious impacts, none of which are included in the impact matrix in this proposed River Plan, or the 2013 ORV report being used as baseline.Instead, cumulative adverse impacts and industrial and recreational use levels, far, far exceed the 1976 baseline. These are not insignificant oversights.

Please include and disclose all relevant (past, present, and foreseeable future) data, reports and analysis known to Glacier National Park, and the Flathead National Forest.

The impacts are significant, which warrants an EIS.
What makes this situation particularly alarming is the pattern of similar bad attitudes demonstrated by the Flathead National Forest and Region 1 attempting arbitrarily raise use levels (using a CE) even higher for special-use permitted commercial outfitters – the antithesis of reasonable and prudent ORV management supposedly prioritizing the full range of protection and enhancement options for Flathead River ORVs. Total daily use is insanely out of compliance. Commercial use permit numbers must be significantly reduced.

A comparison between the Flathead Wild and Scenic River Plan, approved in August, 1980, and later included in the Flathead Forest Plan, approved December 1985 and the current use levels and ecological and adverse impacts to ORVs, including fisheries, especially bull trout, wildlife and recreational quality will show just how ineffective the USFS-USDA has been as a river manager from 1980 until the present time when it is clear that use levels and environmental impacts have been totally ignored, monitoring has been inadequate, and annual reporting has either been withheld from this Scoping/NEPA process, or those records simply do not exist. Where is the data for all those years?

The Endangered Species Act requires that the emphasis of the River Plan is to protect and enhance all ORV's. Fisheries, in-

cluding bull trout are the most vulnerable, most threatened resource value of all those listed.
Where is the concern for bull trout? Where is an action plan to contribute to bull trout recovery? Please formally with the U.S. Fish and Wildlife Service on the impact of this proposal on bull trout and bull trout critical habitat,

What are the redd counts in bull trout critical habitat in the project area? Please also provide the all the historical bull counts that you have in the project area?

Does Glacier National Park have an "incidental take permit?" Does the Flathead National Forest have in its possession a Biological Assessment (BA), or a Biological Opinion and ITP (Incidental Take Permit) forbull trout for this, or any other past Flathead River Plan?

Where is the Incidental Take Permit for bull trout that covers Montana Fish Wildlife and Parks' level of take by issuing unlimited fishing licenses and commercial fishing and guiding permits which do nothing to contribute to the recovery of bull trout?

The proposed Plan violates the Endangered Species Act (ESA).

We believe that FNF must complete a full environmental impact statement (EIS) for this Project because the scope of the Project will likely have a significant individual and cumulative impact on the environment. Alliance has reviewed the statutory and regulatory requirements governing Forest Service projects, as well as the relevant case law, and compiled a check-list of issues

that must be included in the EIS for the Project in order for the FNFs analysis to comply with the law. Following the list of necessary elements, Alliance has also included a general narrative discussion on possible impacts of the Project, with accompanying citations to the relevant scientific literature. These references should be disclosed and discussed in the EIS for the Project. We ask that you also disclose this information in your final EA if you do not write an EIS

I. NECESSARY ELEMENTS FOR

PROJECT EIS or EA:

A. Disclose the acreages of past, current, and reasonably foreseeable logging, grazing, mining, and road building activities within the Project area;

B. Solicit and disclose comments from the Montana Department of Fish, Wildlife, and Parks regarding the impact of the Project on fish and wildlife habitat;

C. Solicit and disclose comments from the Montana Department of Environmental Quality regarding the impact of the Project on water quality;

D. Disclose the biological assessment for the candidate, threatened, or endangered species with potential and/or actual habitat in the Project area;

E. Disclose the biological evaluation for the sensitive and management indicator species with potential and/or actual habitat in the Project area;

F. Disclose the current, during-project, and post-project road densities in the Project area;

G. Disclose the Flathead National Forest's (FNF) record of compliance with state best management practices regarding stream sedimentation from ground-disturbing management activities;

H. Disclose the FNF's record of compliance with its monitoring requirements as set forth in its Resource Management Plan (RMP);

I. Disclose the FNF's record of compliance with the additional monitoring requirements set forth in previous DN/FONSIs and RODs on the Resource Management Plan;

J. Disclose the results of the field surveys for threatened, endangered, sensitive, and rare plants in each of the project area;

K. Please formally consult with the US FWS on the impacts of this project on candidate, threatened, or endangered species and plants;

L. Will this Project exacerbate existing noxious weed infestations and start new infestations?

M. Please disclose whether you have conducted surveys in the Project area for this Project for wolverines, pine martins, northern goshawk and lynx. Please disclose when was the last time you have conducted surveys in the Project area for this Project for wolverines, grizzly bears, bull trout, pine martins, northern goshawk, monarch butterflies, whitebark pine, and lynx.

N. Please disclose how often the Project area has been surveyed for wolverines, pine martins, bull trout, northern goshawks, monarch butterflies, grizzly bears, bald eagles, golden eagles, whitebark pine and lynx.

O. Is it impossible for a wolverines, pine martins, monarch butterflies, northern goshawks, grizzly bears, monarch butterflies, whitebark pine, bald eagles, golden eagles, and lynx to inhabit the Project area?

P. Would the habitat be better for bull trout, bull trout critical habitat, wolverines, monarch butterflies, pine martins, northern goshawks, grizzly bears, whitebark pine and lynx if roads were removed in the Project area?

Q. What is the U.S. FWS position on the impacts of this Project on wolverines, pine martins, monarch butterflies, northern goshawks, grizzly bears, whitebark pine, bald eagles, golden eagles, and lynx? Have you conducted ESA consultation?

R. Please provide us with the full BA and BO for the wolverines, monarch butterflies, pine martins, bull trout, bull trout critical habitat, northern goshawks, grizzly bears, monarch butterflies, whitebark pine, bald eagles, golden eagles, and lynx. The public has a right to see them so they can write informed comments.

S. Disclose the level of current noxious weed infestations in the Project area and the cause of those infestations;

T. Disclose the impact of the Project on noxious weed infestations and native plant communities;

U. Disclose the amount of detrimental soil disturbance that currently exists in each proposed unit from previous logging and grazing activities;

T. Disclose and address the concerns expressed by the ID Team in the draft Five-Year Review of the RMP regarding the failure to monitor population trends of MIS, the inadequacy of the For-

est Plan old growth standard, and the failure to compile data to establish a reliable inventory of sensitive species on the Forest;

U. Disclose the actions being taken to reduce fuels on private lands adjacent to the Project area and how those activities/or lack thereof will impact the efficacy of the activities proposed for this Project;

V. Disclose the baseline condition, and expected sedimentation during and after activities, for all streams in the area;

III. Disclose maps of the area that show the following elements:

1. Past, current, and reasonably foreseeable logging units in the Project area;

2. Past, current, and reasonably foreseeable grazing allotments in the Project area;

3. Density of human residences within 1.5 miles from the Project unit boundaries;

4. Hiding cover in the Project area according to the Forest Plan definition;

6. Moose winter range;

The project will likely violate the NEPA if the mitigation measures for MIS, sensitive species, and Montana Species of Concern (birds, mammals including bats) are not clearly defined, and demonstrated to be effective as per the current best science.

We request a careful analysis of the impacts to fisheries and water quality, including considerations of sedimentation, increases in peak flow, channel stability, risk of rain on snow events, and increases in stream water temperature. Please disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of the project activities. Where live-

stock are permitted to graze, we ask that you assess the present condition and continue to monitor the impacts of grazing activities upon vegetation diversity, soil compaction, stream bank stability and subsequent sedimentation. Livestock grazing occurs in the Project area and causes sediment impacts, trampled or destabilized banks, increased nutrient loads in streams, and decreased density, diversity, and function of riparian vegetation that may lead to in- creased stream temperatures and further detrimental impacts to water quality.

The project will likely violate the NEPA if the mitigation measures for MIS, sensitive species, and Montana Species of Concern (birds, mammals including bats) are not clearly defined, and demonstrated to be effective as per the current best science.

FAILURE TO REVIEW AND PROTECT CULTURAL AND

HISTORICAL RESOURCES

Consultation with the State Historic Preservation Office (SHPO) must be completed prior to a decision being signed. Since the EA states that no surveys will occur prior to the decision being signed. Since the EA is using conditions based management, i.e., you are violating NEPA but not telling the public where, when and how you are going to log and bulldoze roads, please explain how the project is complying with the Historic Preservation Act.

Crucial to the preservation of the historical and cultural foundations of the nation, Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 C.F.R. Part 800 (PDF) (revised August 5, 2004) require Federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties. Additionally, Federal agencies must provide the Advisory Council on Historic Preservation (ACHP) opportunity to comment on such projects prior to the agency's final decision.

A Federal project that requires review under Section 106 is defined as an "undertaking." An undertaking means a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval.

Section 110 of the NHPA

Added to the NHPA in 1992, Section 110 requires Federal agencies to emphasize the preservation and enhancement of cultural resources. Section 110 directs agencies to initiate measures necessary to direct their policies, plans, and pro- grams in such a way that federally-owned sites, structures, and objects of historical architectural or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the public. The agencies are also encouraged to institute (in consultation with the ACHP) procedures to assure Federal plans and

programs contribute to the preservation and enhancement of non-Federally owned sites, structures, and objects of historical, architectural, and archaeological significance. Has the MT SHPO received this survey? The cultural surveys need to be done before the NEPA and NHPA process can be completed, which has not occurred. The project must be approved by the SHPO and the public needs to given a chance to comment on this.

How effective have has been at stopping (i.e. preventing) new weed infestations from starting during building and using new trails?

Is it true that noxious weeds are one of the top threats to bio- diversity on our public lands?

Weeds

Native plants are the foundation upon which the ecosystems of the Forest are built, providing forage and shelter for all native wildlife, bird and insect species, supporting the natural processes of the landscape, and providing the context within which the public find recreational and spiritual opportunities. All these uses or values of land are hindered or lost by con- version of native vegetation to invasive and noxious plants. The ecological threats posed by noxious weed infestations are so great that a former chief of the Forest Service called the invasion of noxious weeds “devastating” and a “biological disaster.” Despite implementation of FNF “best management practices” (BMPs), noxious weed infestation on the Forest is getting worse and noxious weeds will likely overtake native plant populations if introduced into areas that are not yet infested. The FNF has recognized that the effects of noxious weed invasions may be irreversible. Even if weeds are eliminated with herbicide treatment, they may be replaced by other weeds, not by native plant species.

Invasive plant species, also called noxious weeds, are one of the greatest modern threats to biodiversity on earth. Noxious weeds cause harm because they displace native plants, resulting in a loss of diversity and a change in the structure of a plant community. By increasing river use, invasive plants like knapweed may increase sediment yield and surface runoff in an ecosystem. As well knapweed may alter organic matter distribution and nutrient through a greater ability to uptake phosphorus over some native species in grasslands. Weed colonization can alter fire behavior by increasing flammability: for example, cheatgrass, a widespread noxious weed on the Forest, cures early and leads to more frequent burning. Weed colonization can also deplete soil nutrients and change the physical structure of soils.

Please analyze the effect of the increase river use on small animals and plants on and next to the river,

Please more fully analyze the effect of increase river use in the project area on other fish, wildlife and birds in the project area.

Please address the ecological, social and ascetic impact of current noxious weed infestations within the project area. Include an analysis of the impact of the actions proposed by this project on the long and short term spread of current and new noxious weed infestations. What treatment methods will be used to address growing noxious weed problems? What noxious weeds are currently and historically found within the project area? Please include a map of current noxious weed infestations which includes knapweed, Saint Johnswort, cheat grass, bull thistle, Canada thistle, hawkweed, hound's- tongue, oxeye daisy and all other Category 1, Category 2 and Category 3 weeds classified as noxious in the MONTANA COUNTY NOXIOUS

WEED LIST. State-listed Category 2 noxious weed species yellow and orange hawkweeds are recently established (within the last 5 to 10 years) in Montana and are rapidly expand- ing in established areas. They can invade undisturbed areas where native plant communities are intact. These species can persist in shaded conditions and of- ten grow under- neath shrubs making eradication very difficult. Their stoloniferous (growing at the surface or below ground) habit can create dense mats that can persist and spread to densities of 3500 plants per square mile (Thomas and Dale 1975). Are yellow and orange hawk- weeds present within the project area?

Please address the cumulative, direct and indirect effects of the proposed project on weed introduction, spread and persistence that includes how weed infestations have been and will be influenced by the use of mechanical equipment such as bikes and the trails proposed within this project. What methods will be used to assure that existent noxious weed populations are not spread?

Noxious weeds are not eradicated with single herbicide treatments. A onetime application may kill an individual plant but dormant seeds in the ground can still sprout after herbicide treatment. Thus, herbicides must be used on consistent, repetitive schedules to be effective.

What commitment to a long-term, consistent strategy of application is being proposed for each weed infested area within the proposed action area? What long term monitoring of weed populations is proposed?

What native plant restoration activities will be implemented in areas disturbed by the actions proposed in this project? Will disturbed areas including road corridors, skid trails, and burn units be planted or reseeded with native plant species?

The scientific and managerial consensus is that prevention is the most effective way to manage noxious weeds. For example, the FNF concedes that preventing the introduction of weeds into un-

infested areas is “the most critical component of a weed management program.” The FNF’s national management strategy for noxious weeds also recommends “develop[ing] and implement[ing] forest plan standards . . . .” and recognizes that the cheapest and most effective solution is prevention. Which areas within the project area currently have no noxious weed populations within their boundaries? What minimum standards are in the project proposal to address noxious weed infestations? Please include an alternative that includes land management standards that will prevent new weed infestations by addressing the causes of weed infestation. The failure to include preventive standards violates NEPA because the FNF is not ensuring the protection of soils and native plant communities. Additionally, the omission of an EIS alternative that includes preventive measures would violate NEPA because the FNF would fail to consider a reasonable alternative.

Rare Plants

The ESA requires that the we conserve endangered and threatened species of plants as well as animals. In addition to plants protected under the ESA, the FBF identifies species for which population viability is a concern as "sensitive species" designated by the Regional Forester (FSM 2670.44). The response of each of the sensitive plant species to management activity varies by species, and in some cases, is not fully known.

How does the FNF identify what is a sensitive species?

Thank you for your attention to these concerns.

Sincerely yours,

Mike Garrity

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