



February 6, 2025

Anthony Botello, Forest Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Re: Flathead Comprehensive River Management Plan Revision

Dear Anthony Botello,

The Montana Department of Environmental Quality (DEQ) appreciates the opportunity to comment on the proposed Comprehensive River Management Plan for the Flathead Wild and Scenic River System. Specifically, the DEQ Nonpoint Source and Wetlands Section is commenting on this effort as it relates to water quality.

DEQ supports the proposed activities in the Plan that protect and restore water quality, helping meet the goals of the Clean Water Act and Montana Water Quality Act. The Flathead National Forest is an important partner for doing this work, and the Flathead Comprehensive River Management Plan states our shared goal of restoring water quality and protecting outstandingly remarkable values. The only known impairment within the Flathead Wild and Scenic River System is a flow impairment on the South Fork from the Hungry Horse Dam to mouth section, likely due to impacts from hydrostructure. This Plan update is an appropriate next step to protect and maintain the water quality and outstandingly remarkable values across the Flathead Wild and Scenic River System.

DEQ's suggestions for improving the proposed Management Plan include:

- The sentence preceding Table 5 says that "potential management action(s) are identified...if a particular trigger is reached," however, it is unclear where to find those potential management actions. A column for potential management actions could be added to Table 5 or clarify the sentence preceding Table 5 to explain how potential management actions will be identified in the future.
- The South Fork does not share the same A-1 beneficial use class as the North and Middle Forks; it has a B-1 beneficial use class with different applicable criteria. For the *E. coli* indicator in Table 5, it would be clearer to replace "Current MT DEQ Standards or- No single sample may exceed 32 *E. coli* organisms per 100 mL" with "Current MT DEQ Criteria (Makarowski, 2020)*".

DEQ applauds the Forest Service for this plan that implements best practices including reducing sediment delivery, improving aquatic species habitat, reducing vehicle and stream interactions, and addressing the potential for nutrients and pathogens to enter the waterway through human waste.

Sincerely,

A handwritten signature in black ink, appearing to read "Hannah Riedl", is written over a horizontal line.

Hannah Riedl
Nonpoint Source and Wetlands Section Supervisor
Hannah.Riedl@mt.gov, 406-444-0549

*Makarowski, Kathryn. 2020. *Escherichia coli* (E. coli) Assessment Method for State Surface Waters. Helena, MT: Montana Department of Environmental Quality. Document WQDWQPBWQA-01, Version 1.0.
https://deq.mt.gov/files/Water/SurfaceWater/UseAssessment/Documents/EcoliAssessmentMethod_WQDWQPBWQA-01v1_Final.pdf