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First name: Dean

Last name: Yashan

Organization: Montana Department of Environmental Quality

Title:

Comments: Mid-Swan Project Comments

Dear Ms. Feigley,

Please accept the attached comments on the Mid-Swan Landscape Restoration and Wildland Urban Interface Project Proposed Action.

Thank you,

Dean Yashan

Environmental Program Manager

Montana Department of Environmental Quality

(406) 444 - 5317

Attention: Rachael Feigley Mid-Swan Project

24 Fort Missoula Road, Missoula, Montana 59804

Dear Ms. Feigley,

The Department of Environmental Quality's (DEQ) Watershed Protection Section appreciates the opportunity to comment on the Flathead National Forest's Mid-Swan Landscape Restoration and Wildland Urban Interface Project Proposed Action. DEQ is supportive of, and has provided significant Clean Water Act section 319 funding for reducing road-related sources of sediment in streams in the Swan watershed. As the scoping document points out, the high road density in the project area as well as location of roads has been identified as a water quality concern. We note that the DEQ developed a "Water Quality Protection Plan and TMDLs for the Swan Lake Watershed" in 2004, that identified roads as the most significant source of human-caused sediment impairments in the watershed. We also note that we worked with the Flathead National Forest to remove the sediment impairment listing on Jim Creek in the project area, representing a significant success story for Montana's forest industry.

The Mid-Swan Landscape Restoration & Wildland Urban Interface Project Scoping Document identifies three purposes for the project, one being restoring and maintaining aquatic biodiversity. The challenges to this purpose are identified as sediment in streams, human caused barriers to fish passage, lack of small scale disturbance to riparian areas and reduced beaver activity. We agree that these all represent challenges to maintaining aquatic biodiversity . We offer the following specific comments for your consideration:

\* Nine beaver analogue structures are proposed as part of the project scoping on page 6. Though these can help address impacts from reduced beaver activity, it would be advantageous to discuss or further include efforts that facilitate improved beaver populations where appropriate.

\* Given the project scoping concern regarding road densities and the impact of road-derived sediment/siltation in streams in the project area, it appears that the project scoping document should clarify road planning details somewhat captured within the Appendix B project and road maps. These details should address road planning aspects regarding public accessibility, closure plans, maintenance, and locations where new roads will be built. For example, the Proposed Road and Aquatic Treatment Areas map, and the Proposed Road and Aquatic Treatment Areas by Watershed maps identify what appears to be significant construction of new system road miles. This information should be discussed in some detail within the project scoping document.

DEQ strongly supports the reduction of sediment to streams in the Mid-Swan Landscape Restoration project area, and looks forward to being considered a partner in this effort. If you would like more discussion with DEQ regarding comments made in this letter, please contact Robert Ray, Water Quality Specialist, at 444- 5319 or rray@mt.gov.

Sincerely,

J-L

Dean Yashan

Watershed Protection Section Supervisor, Water Protection Bureau Montana Department of Environmental Quality