



September 16, 2023

Steve Brown, Stevensville District Ranger
Bitterroot National Forest
88 Main Street
Stevensville, MT 59870

Re: Comments on the Bitterroot Front Project

Dear District Ranger Brown,

American Rivers appreciates the opportunity to submit the following comments on the on the Bitterroot Front Project on the Bitterroot National Forest.

Founded in 1973, American Rivers is the leading conservation organization working to protect and restore the nation's rivers and streams. American Rivers works alongside communities as we champion a movement to protect and restore the rivers on which we all depend. Currently, we have more than 7,000 members and supporters in Montana, many of whom live along, work on, and/or recreate on rivers and streams flowing through the Bitterroot National Forest.

In general, American Rivers is supportive of Forest Service efforts to return natural fire regimes to our public lands and to increase society's ability to live with fire as a natural process. Mechanical thinning methods coupled with prescribed burning have been shown to be effective at returning more natural fire regimes to many areas where a long history of suppression has created conditions that predispose communities to higher risks of catastrophic fire. Prescribed fire, in particular, has minimal impact on downstream water quality compared to extreme wildfires, reduces overgrown vegetation and surface fuels and—at its best—can protect communities while improving resilience in riparian areas. However, to ensure riparian areas remain intact during periods of intensive forest management, extra safeguards must be adopted to protect rivers and streams from short and long-term sedimentation, bank instability, increased water temperatures due to elimination of shade tree cover, and the loss of unique and exemplary scenic, recreational, or cultural values.

In summary, American Rivers requests that the Bitterroot National Forest:

- 1. Adopt a programmatic, tiered NEPA approach, rather than a condition-based approach, to ensure sound NEPA compliance and foster public trust*
- 2. Safeguard headwater streams by adopting standards to minimize sedimentation and requiring water quality monitoring and mitigation measures*
- 3. Protect Outstandingly Remarkable Values for existing and potentially eligible Wild and Scenic streams within the project area*

We describe these requests in further detail below.

Adopt a Programmatic, Rather Than Condition-Based, NEPA Approach

The intent of NEPA is two-fold: (1) to consider environmental impacts of proposed actions and (2) to broadly provide information about those actions to ensure informed public participation in decision-making. A condition-based approach conflicts with sound NEPA compliance, leads to worse outcomes on the ground, does not improve planning efficiency, and may degrade the public's trust in advance of the upcoming Bitterroot National Forest's plan revision

process. The Bitterroot Front project proposes to undertake logging and burning actions covering 143,000 acres over 20 years, without specifying which actions will occur where or when and absent a level of detail required by NEPA and necessary for the public's evaluation of project consequences. This is the heart of the problem with condition-based NEPA: conditions vary, topography varies, habitats vary, and so impacts of proposed logging, burning, and road construction will vary in ways that an analysis that ignores these variations and provides insufficient detail cannot capture. Moreover, it prevents the public from responsibly commenting on such projects. The long-term nature of the Bitterroot Front project is a major cause of the concern that conditions, and therefore impacts, could change with time, especially as climate impacts accelerate in western Montana.

Site-specific NEPA analysis and disclosure is required by law, leads to better outcomes, fosters public trust, and is critical to promoting administration priorities like combatting climate change. Federal agencies already possess tools like programmatic NEPA reviews and tiering that address the stated needs for fast-tracked condition-based management while also adhering to NEPA. NEPA regulations already anticipate the need for a deft approach to an ever-changing landscape. Those regulations allow for a programmatic NEPA analysis to define the overall landscape-scale strategy and sideboards of the program, and for quicker and more efficient site-specific project analyses tied to it. A programmatic analysis followed by tiered site-specific NEPA analyses would be consistent with regulations and would speed up the consideration and implementation of individual treatments while providing the rigorous analysis and required opportunity for public review and input required by NEPA. American Rivers strongly recommends that the Bitterroot National Forest develop its proposal as a programmatic NEPA document that commits to carrying out site-specific analyses that are tied to an overall landscape-scale strategy, ensuring that impacts are evaluated, disclosed, and informed by public engagement.

Safeguard Headwater Stream Connectivity Through Standards, Monitoring, and Mitigation

One common denominator of resilient rivers is healthy, connected headwater streams. Connectivity is supported by retaining or restoring natural flow patterns and timing; production and movement of large woody debris; and maintaining riparian communities as sources of organic matter and shade¹. Connectivity includes habitats required for the full range of life histories and gene flow and ensures migration pathways for fish as water temperatures increase and flows decrease due to climate change. Where fish populations have access to diverse, well-connected habitats and/or the capacity to adapt to changing environments, vulnerability is lessened².

All streams originating within the Selway-Bitterroot Wilderness that flow through the project area and eventually reach the Bitterroot River represent essential headwater streams within the larger watershed. American Rivers has identified 16 streams (see Table 1) as worthy of Wild and Scenic eligibility protections in the Bitterroot National Forest's upcoming forest plan revision. Currently, two of these streams, Lost Horse Creek and Blodgett Creek, are protected as Wild and Scenic eligible under the existing 1987 forest plan. Tables 4 and 5 within the project's Watersheds and Aquatic chapter confirm that all of these streams supply important habitat for bull trout, westslope cutthroat trout, or both, and identify strongholds for resident populations. The Forest Service's climate shield research further identifies seven of these 16 streams as protecting key coldwater habitat for temperature-sensitive species in 2040³, which is within the anticipated lifespan of the project.

¹ Bisson, P.A. et al. (2003). Fire and aquatic ecosystems of the western USA: current knowledge and key questions. *Forest Ecology and Management*, 178: 213-229.

² Rieman, B., Gresswell, R. and Rinne, J. (2012). [Fire and fish: A synthesis of observation and experience](#). In: Luce, Charles; Morgan, Penny; Dwire, Kathleen; Isaak, Daniel; Holden, Zachary; Rieman, Bruce. *Climate change, forests, fire, water, and fish: Building resilient landscapes, streams, and managers*. Gen. Tech. Rep. RMRS-GTR-290. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. p. 159-175. <https://www.fs.usda.gov/research/treesearch/41933>

³ Isaak, Daniel J.; Young, Michael K.; Nagel, David E.; Horan, Dona L.; Groce, Matthew C. (2015). [The cold-water climate shield: Delineating refugia for preserving salmonid fishes through the 21st century](#). *Global Change Biology*. 21: 2540-2553. https://www.fs.usda.gov/rm/pubs_journals/2015/rmrs_2015_isaak_d001.pdf

Table 1. Wild and Scenic eligible streams on the Bitterroot National Forest identified in [American Rivers 2022 report](#)⁴.

RANGER DISTRICT	NAME	MILEAGE	Outstandingly Remarkable Values	CLASSIFICATION
Darby	Chaffin Creek	10	Climate Refuge, Fish, Geology, Recreation, Scenery	Wild, Scenic
	Lost Horse Creek	15	Fish, Geology, History, Recreation, Scenery	Scenic
	South Fork Lost Horse Creek	10	Fish, Scenery	Wild
	Rock Creek	12	Recreation, Scenery	Wild
	Tenmile Creek	3	Fish, Recreation	Wild
	Tin Cup Creek	11	Climate Refuge, Fish, Recreation, Scenery	Wild
	Trapper Creek	12	Climate Refuge, Fish, Recreation	Wild, Scenic
	North Fork Trapper Creek	8	Climate Refuge, Fish	Wild
Stevensville	Bear Creek	9	Climate Refuge, Fish, Geology, Recreation, Scenery	Wild
	Big Creek	10	Fish, Recreation	Wild, Scenic
	Blodgett Creek	14	Fish, Geology, History, Recreation, Scenery	Scenic
	Fred Burr Creek	10	Fish, Recreation, Scenery	Wild, Scenic
	Kootenai Creek	7	Fish, Geology, Recreation, Scenery, Wildlife	Wild
	Mill Creek	11	Fish, Geology, Recreation, Wildlife	Wild
	Sweathouse Creek	5	Culture, Climate Refuge, Geology, Recreation	Wild
	Sweeney Creek	10	Climate Refuge, Scenery	Wild

Overall, fuels management activities conducted within the project area proximate to these 16 streams have the potential to negatively impact connectivity by decreasing water quality and increasing stream temperatures broadly within the Bitterroot River watershed. Among the most impactful fuels management activities affecting rivers and streams are road building and decommissioning. Although road decommissioning is desirable in the longer-term, it causes shorter-term impacts that must be monitored and mitigated to achieve longer-term benefits. While we support the proposal to decommission just over ten miles of roads and use the existing road network for project activities, new roads and some decommissioned roads are proximate to streams (one is within 100 feet), yet exact distances, slopes, and other factors relevant to determining erosion and temperature impacts are not provided. Road actions, including but not limited to transportation to-and-from operation sites and log hauling, will be occurring on seven miles of roads that are within 100 feet of streams including Chaffin Creek, Larry Creek, McCalla Creek, Spooner Creek, Sweathouse Creek, Trapper Creek, and the Bitterroot River near Darby. Chaffin, Sweathouse, and Trapper creeks all contain resident bull trout populations; and all of these streams support westslope cutthroat trout. We support many of the suggested practices to minimize sediment delivery and preserve natural shade near these and other streams to retain

⁴ American Rivers (2022, September). [Wild and Scenic River Eligibility Report: Lolo and Bitterroot National Forests](https://www.americanrivers.org/wp-content/uploads/2023/02/American-Rivers-Lolo-Bitterroot-Wild-and-Scenic-Rivers-Eligibility-Report-2022.pdf).
<https://www.americanrivers.org/wp-content/uploads/2023/02/American-Rivers-Lolo-Bitterroot-Wild-and-Scenic-Rivers-Eligibility-Report-2022.pdf>

overall connectivity with the Bitterroot River watershed.

Best practices should prohibit:

- New stream crossings on fish-bearing streams
- Roads constructed within Riparian Conservation Habitat Areas (RCHAs) or within ¼ mile of any of the 16 streams listed above in Table 1
- Logging within 300 feet of fish-bearing streams or 150 feet of non-fish-bearing/intermittent streams
- Timber harvest, yarding, and log landings in RCHAs
- Equivalent Clearcut Areas over 20% within affected watersheds
- Manual thinning, piling of slash, or pile burning within 50 feet of streams and wetlands
- Log hauling on road segments proximate to Chaffin, Sweathouse, and Trapper creeks during bull trout spawning in the fall months

During decommissioning, we support the proposed use of mulching, re-vegetation, placing slash to disperse overland flows, and enhancement or retention of fish passage.

While best practices are designed to reduce unwanted consequences, monitoring is necessary to verify their efficacy. Due to the lack of site-specific analyses included for this project under a condition-based NEPA approach, impacts to streams are not clearly analyzed and no monitoring or mitigation measures have been outlined. This lack of detail makes it impossible to determine whether unreasonable impacts to streams within the project area will occur and whether they will jeopardize connectivity for bull trout and westslope cutthroat trout populations. Within a programmatic NEPA approach, American Rivers strongly requests that the Bitterroot National Forest expressly build water quality and temperature monitoring and mitigation measures—with special attention to roads within 100 feet of streams—into the site-specific analyses and provide clean and transparent links between actions, monitoring, mitigation, and stream connectivity.

Protect Outstandingly Remarkable River Values

American Rivers has identified 16 streams (see Table 1 above) as worthy of Wild and Scenic eligibility protections in the Bitterroot National Forest's upcoming forest plan revision. Currently, two of these streams, Lost Horse Creek and Blodgett Creek, are protected as Wild and Scenic eligible under the 1987 forest plan. The 1987 plan identifies both Blodgett and Lost Horse creeks as having scenic and geologic Outstandingly Remarkable Values (ORVs). In addition, American Rivers' [Wild and Scenic River Eligibility Report: Lolo and Bitterroot National Forests](#)⁵ identifies these streams as having fish, recreation, and history ORVs. The listing of bull trout as a threatened species under the Endangered Species Act serves as just one example of changing conditions on the forest since 1987 that will make reassessment of river values necessary during the upcoming planning process. The other 14 streams listed above in Table 1 are not currently eligible under the 1987 forest plan, but they possess numerous ORVs including native fish populations, coldwater refugia for those fish populations during the lifetime of the project, increasing recreation within the Bitterroot Valley, scenery, history, significant Indigenous cultural sites, and essential wildlife areas, such as peregrine falcon nesting sites.

While projects undertaken on the forest can *affect* ORVs, they cannot *unreasonably diminish* them, nor can a project be used as justification to eliminate worthy streams from consideration during the upcoming forest plan revision. During the lifetime of the Bitterroot Front project, American Rivers requests that the Bitterroot National Forest retain and protect the values identified for rivers listed in Table 1 above by ensuring that:

- Fish populations remain unaffected by sedimentation and that shade cover is retained
- Scenery is not unduly impacted by fuels treatments
- Recreational opportunities including trails, swimming areas, walk-and-wade angling areas, climbing and bouldering sites, and elite whitewater paddling runs remain accessible
- Historical and cultural sites are protected against impacts from fuels treatments and remain accessible to

⁵ Ibid.

Indigenous peoples

- Fuels treatments do not take place proximate to peregrine falcon nesting sites

As mentioned in the previous sections, the current condition-based NEPA approach provides insufficient evidence to suggest that ORVs can be maintained without the level of detail included within traditional site-specific analyses.

Thank you for the opportunity to provide comments on the proposed Bitterroot Front project.

Warm regards,

A handwritten signature in black ink that reads "Lisa A. K. Ronald". The signature is written in a cursive, flowing style.

Lisa Ronald
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