



Matt Anderson
Bitterroot Forest Supervisor
Bitterroot National Forest
1801 N 1st St
Hamilton, MT 59840

RE: Comments on the Bitterroot Front Project Draft Environmental Assessment

Mr. Anderson,

This letter transmits comments from Montana Trout Unlimited (MTU) and Trout Unlimited (TU) (collectively referred to in this letter as “TU”) on the Draft Environmental Assessment for the proposed Bitterroot Front Project on the Bitterroot National Forest.

TU represents 300,000 members and supporters across the country. MTU represents the organization’s 4,000 members, supporters and 13 TU chapters in Montana. TU’s mission is to conserve, protect and restore coldwater fisheries and their watersheds. Many of our members have a passion for the conservation of coldwater fisheries located on the Bitterroot National Forests, as well as waters located downstream from the forest. Additionally, TU is an active participant in regional land and fisheries management issues, both on and off the Forest.

Overview

TU supports logging and timber harvest in a way that contributes to ecological and economic sustainability and forest health. However, logging, prescribed burns and other forest treatments must be done in a way that protects the watersheds and streams in the treatment areas. The Bitterroot Front Project is a large, proposed project, at 143,340 acres, within critical bull trout and westslope cutthroat trout habitat. New roads, prescribed burning, and certain logging techniques can cause serious erosion and sediment issues in watersheds, riparian areas, and trout habitat. Extreme caution and due diligence must be taken in the implementation process for each phase of the project in order to protect the fisheries and aquatic resources.

The Draft EA states that project will follow the guidelines and management direction laid out in the 1987 Forest Plan when applicable. We believe the 1987 Plan does a sufficient job listing out specific issues that can be caused by timber projects, i.e., soil disturbances, erosion, sedimentation, which all can contribute to a decline of water quality. It also points out the issue of large woody debris by stating, “The removal of large woody material from streambank may affect the formation of pools by destroying potential additions to instream debris.” Pools are more commonly known as fish habitat.

However, we are encouraged to see in Appendix A Resource Specific Guidelines, the addition of the Inland Native Fish Strategy (INFISH), Riparian Habitat Conservation Area (RHCA) buffers, and the stipulations that come along with those.

Bull Trout and Westslope Cutthroat Trout

The Bitterroot Forest is one of the last strongholds of threatened bull trout. Westslope cutthroat trout is the state fish of Montana, a Forest Service Region 1 sensitive species, and listed as an indicator species in the 1987 Forest Plan. We are encouraged to see stated in the Draft EA that “these species are representative of all aquatic species habitat conditions, both species require clean stream substrates for spawning and rearing; cold water for survival; complex habitats, including streams with riffles and deep pools, undercut banks, and many large logs; and connected migratory habitats to fulfill life histories (spawning, rearing, and overwintering) and to access refugia during disturbance.”

TU considers the conservation and protection of these two native species and their habitat in the project area as a top priority. Continued and long-term monitoring of these species through the life of the project and into the future will be necessary to make sure none of the proposed project activities has negative effects on these species and their habitat. We would hope to see a monitoring plan in the final EA or in each project phase.

Timber and Logging

INFISH and RHCA buffers require the following buffers for timber harvest:

- 300 feet on each side of fish-bearing streams
- 150 feet on each side of perennial, non-fish bearing streams
- 100 feet on each side of intermittent streams
- 50 feet on each side of wetlands smaller than 1 acre in area

While INFISH allows for some site-specific alterations of the buffers, we believe, especially in bull trout or cutthroat streams, that the buffers remain 300 feet or larger in each phase of the project. These buffers provide necessary protection to water quality, critical fish and wildlife habitat, and actively regulates high flood flows. Improper timber harvesting can cause erosion, water quality problems, and degrade stream integrity.

Prescribed Burning

Prescribed burning can be an effective forest management tool to reduce the probability of high severity wildfires within the project area and the surrounding area. However, while we understand

prescribed burns are not nearly as severe as uncontrolled forest fire, fire of any kind, especially in and around watersheds, can have harmful impacts to water quality, hydrology, and aquatic ecosystems. After reviewing the 1987 Forest Plan, besides air quality, it doesn't appear that plan has any specific management guidelines or directives for prescribed burns in watersheds or riparian areas. As with timber harvest, we are encouraged to see the INFISH and RHCA buffers referenced as a necessary compliance for prescribed burns. Not allowing for fire ignition in riparian areas, but back burning through riparian areas will keep fire intensity low to moderate and while decreasing fuel loads. This should be the standard in all phases of the project.

Transportation and Roads

The 1987 Bitterroot Forest Plan sites roads and transportation corridors as the most prominent threat to watersheds and aquatic ecosystems. Roads in or near riparian zones can cause significant sediment to be delivered to streams. This adversely affects fisheries by smothering eggs, fry, and food organisms. Fry and fingerlings lose hiding cover and are more vulnerable to predators. Water quality is affected by road building to the greatest degree of any Forest activity. Roads through wet areas are often responsible for triggering mass soil movement. Additionally, according to the Forest Plan, catchable trout populations are projected to decrease 15 percent by the end of decade, due mostly to sedimentation from roads.

Because of these issues cited in the Forest Plan, any roads or transportation corridors must be regulated and managed to the highest degree. The Forest Plan stipulates that "road surface runoff should be channeled off the road outside of riparian areas. Drive through dips, in or out slopes or cross drains with ditches may be appropriate. Some cross drainage and/or surfacing will normally be provided within 200 feet of all stream channel crossings unless native material resists erosion." Once more, seeing INFISH standards in Appendix A the Draft EA in encouraging, and we fully support the stipulation of no new crossing in fish bearing streams.

Along with INFISH, Montana Stream Management Zones are also cited as a regulation to be complied with. It is our opinion that SMZs are not as protective as INFISH guidelines and regulations and would hope the more conservative INFISH be used when regulating temporary roads or transportation corridors.

Conclusion

TU appreciates that focused protections on watersheds and fisheries were included in the Draft EA. This is a very large project with some very positive potential benefits for the area. We appreciate the opportunity to offer our recommendations and comments and will continue to participate in the other implementation planning processes moving forward.

Sincerely,

A handwritten signature in blue ink that reads "Colin Cooney". The signature is written in a cursive style with a horizontal line underneath.

Colin Cooney
Montana Field Representative
Trout Unlimited

A handwritten signature in blue ink that reads "David Brooks". The signature is written in a cursive style.

David Brooks
Executive Director
Montana Trout Unlimited