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First name: Barb
Last name: Beck
Organization: Montana Fish, Wildlife & Parks
Title: regional supervisor
Comments: Montana Fish, Wildlife & Parks (FWP) has requested in past planning that the U.S. Forest Service incorporate Montana's state Species of Concern list and not rely strictly on the federal lists for species of concern.

The Greater Red Lodge Area Vegetation and Habitat Management Project is an example of work that should include those species. Montana species of concern included in the project footprint, but not addressed in the draft supplemental environmental impact statement, include Northern Leopard Frog, Plains Spadefoot and Western Toads, Short-horned Lizard, Milk Snake, and several bird species as well as Yellowstone Cutthroat Trout.

The draft supplemental environmental impact statement does not appear to reference fisheries issues or riparian setback information other than for support of lynx and grizzly bear corridors.
Many streams in this area are fish-bearing as described by U.S. Forest Service maps and offer recreational fishing opportunity as well as current and potential habitat for Yellowstone Cutthroat Trout. All the streams feed into fish-bearing streams and should be treated as if they are fish-bearing.
Any impacts to stream banks, including crossings as agreed to by a Memorandum of Understanding, require FWP 124 permitting to ensure that Best Management Practices (BMP) are used.

Timing restrictions in some locations may be required to protect spawning fish and fish redds. The Forest Service recognizes in the original EIS the need to consider timing restrictions. These should be agreed upon by the local FWP biologist and Forest Service fish biologists.

Riparian areas serve as filters and can store water. Diverse vegetation in these areas provide shade that can keep water temperatures cool. These functions are extremely important in late summer when clean cool water can be in short supply in the lower reaches of watersheds. Protection of these areas allows for succession of plants (including conifer) providing long-term persistence. Functional riparian areas can provide bank stabilization, reduce erosion and limit sedimentation, thus reducing potential of having to address total maximum daily load (TMDL) issues.

Overstory and understory vegetation is necessary for aquatic health and riparian health, judicious cutting or mulching following BMP's and Riparian Management Zone work in stream corridors is expected to promote adequate filtering, shading, and other riparian functions during and beyond project actions. These considerations should be addressed in the supplemental EIS.

Road creation and removal can impact streams and sediment. A recent Forest Service project impaired spawning habitat for trout in the Boulder River drainage. FWP 124 permitting is anticipated to allow input for specific sites, such as road work in riparian areas and near riparian areas that may need to implement sediment retention and reduction through BMP's.