

Data Submitted (UTC 11): 5/23/2022 6:00:00 AM
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May 20, 2022

RE: Bitterroot Front Project

To Bitterroot National Forest Supervisor Matthew Anderson:

The Bitterroot River Protection Association is submitting the following comments in response to the Bitterroot National Forest's proposed Bitterroot Front Project.

Since our organization's mission is to protect and preserve the aquatic ecosystems and fisheries of the Bitterroot River and its tributaries and to protect the aesthetic and ecological integrity of the entire watershed, we are very concerned about potential negative impacts on the water quality and quantity and timing flows in the watershed.

After reviewing the proposal, we have at least two major concerns that we would like to see addressed explicitly before we could approve of the project.

Our first concern is that the proposal appears to be a request for blanket approval to apply a set of "treatments" to "unhealthy" portions of the forest to make them healthier and more resilient to the damage always occurring from beetle infestations, Spruce budworm, mistletoe and to relieve certain threats, such as high fuel loading, etc. You are proposing to use several means to accomplish this including some stream rehabilitation, some road decommissioning, some road building, some thinning and some commercial logging, etc. You plan on undertaking all sorts of actions like this across the entire Bitterroot Front.

But without any plans for any specific actions on the ground showing how, where, when and to what degree these actions are going to be implemented on the ground, what exactly is the public approving? It appears you are asking the public to approve your use of these types of actions in general, but no action in particular. While we may approve of your treatment methods, there seems to be no way for us to actually comment meaningfully on the potential negative or positive impacts on the water quality except in general.

We believe in general that any proposed project that could impact water quality should be monitored. The monitoring should begin before the project is begun in order to gather baseline data. It should continue throughout the project activity and be checked again afterwards.

BRPA got a very positive response from your agency when we submitted similar comments previously. It led to an MOU with the agency to establish a systematic water quality monitoring program across the Bitterroot Front.

Since then, BRPA established three such monitoring stations on the front already with the help of the University of Montana. Continuously recording flow measurement devices were placed on Bass Creek, Mill Creek and Lost Horse Creek. We submitted an application for a grant from DNRC to install the rest of the long-term monitoring system at the wilderness boundary and the lower forest service boundary across the whole front. The grant was accepted but was low on the ranking order and there was not enough funding to go around. We were invited to apply again.

One weak spot in the application was the amount of uncommitted funds. To meet the roughly \$100,000 project budget, BRPA put together a package of committed funds, state grants and volunteer labor, totaling around \$64,000. This left our application with a total of \$36,000 in uncommitted funds and without a commitment from the landowner and project sponsor.

Although we will continue to seek funding locally, as it sits, we are hesitant to re-apply until the Bitterroot National Forest makes a firm commitment to the project. Remember, to get baseline data this monitoring project needs to be implemented prior to any on the ground activities. We would urge the agency to act on this at the soonest possible moment because the full grant process takes a while.

BRPA is strongly in support of the re-introduction of beavers into the watershed as they are proving to be valuable components of a healthy functioning watershed, adding to water storage capacity, extending the late season flows increasing wetland habitat and many other vital contributions to the ecology.

It would be hard for us to approve the Bitterroot Front Project without the establishment of a good water quality/quantity monitoring system set up for the long term. We are hoping you will include this explicitly as part of your plans and move forward with us on installing one.

Thanks for considering our comments,

Michael Howell, Executive Director

Bitterroot River Protection Association