Part 2: Statements of Public Concern

Category: Soils, Watersheds, and Aquatic Ecosystems

PC # 2

Public Concern: The FS should increase road decommissioning and restore watersheds and habitats for fish and wildlife, including making the following changes to the Proposed Land Management Plans:

• Add the following DC: "Road networks are limited to those necessary for management and recreational access which can be adequately maintained within agency budgets and capabilities. Roads that cannot adequately be maintained within agency budgets and capabilities, and which prevent attainment of desired conditions for other resources will be closed and/ore decommissioned".

• Add the following guideline: Minimize resource impacts from new or existing roads through implementation of all applicable BMP standards and/or decommissioning of problem roads.

Sample Statement:

Increase road reclamation programs and watershed restoration programs that will reverse the degradation of the water quality caused by existing roads. (3981.5)

Sample Statement:

Add a guideline to minimize resource impacts from new or existing roads through implementation of all applicable BMP standards and/or decommissioning of problem roads. See Logan, R. 2001. Water Quality BMPs for Montana Forests. EB158, 2001. MSU Extension Publications, Bozeman MT 59717. (5792.130)

Sample Statement:

We recommend that a desired condition be included that indicates that the roads which cannot be adequately maintained within agency budgets and capabilities, and which are causing resource damages, be closed and /or decommissioned. For example, "Road networks are limited to those necessary for management and recreational access which can be adequately maintained within agency budgets and capabilities. Roads that cannot be adequately maintained within agency budgets and capabilities, and which, prevent attainment of desired conditions for other resources will be closed and/or decommissioned." The Lolo NF proposes a watersheds desired condition indicating that, "In conservation and active restoration watersheds, road density would be at a level that is favorable to water quality, bull trout, and westslope cutthroat trout." (4664.20)

Sample Statement:

I urge the Forest Service to make a strong commitment to dedicated watershed restoration and road reclamation programs to improve water quality and wildlife habitat. (4196.5)

PC # 3

Public Concern: The BNF should change the MA designation around McClain Creek from 4.1 to 3.3 and prevent development to account for unstable terrain, provide a buffer to the RNA, benefit wildlife, water quality and trail users. The Forest Service should not use the McClain Creek area for commercial use.

Sample Statement:

On the Bitterroot National forest, I think the management area designation on and around McClain Creek at the northern end of the Bitterroot Geographical Area should be changed from 4.1 (general forest moderate intensity management) to 3.3 (general forest low intensity management). This would be consistent with land management in the surrounding area and would provide a needed buffer zone for the Carlton Ridge Natural Area. The history of soil instability in this area argues against the use of this area for timber harvesting and any type of activity that would require trail cutting or use by large numbers or people. (5124.2)

Sample Statement:

With respect to the northern area of the Bitterroot National Forest, specifically at and around McClain Creek, strongly recommend changing the proposed 4.1 designation to 3.3 so it could be managed like the land surrounding it. This would also establish a much needed buffer zone for part of the Natural Research Area and nearby geologically unstable terrain. (3989.5)

Sample Statement:

I am strongly against the commercial utilization in the McClain Creek area (4835.3)

Sample Statement:

McClain Creek. I would suggest this area be designated 3.3 because it is geologically unstable - refer to past law suits against BNF- and a buffer area is needed between research natural area on the Lolo NF and McClain Creek. I believe that McClain Creek is an impaired stream as well. (4431.5)

PC # 4

Public Concern: The BNF should remove roads 044 and 1381 in the Blue Joint area.

Sample Statement:

There are no outfitters that use the Road System # 044 or # 1381 which stem from the Woods Pass. These roads have not been maintained and are nearly impassable to most motor vehicles or trailers. There can be little doubt that the erosion being produced has an impact on the fisheries of the Blue Joint and its tributaries. Elimination of this road system would also make that combined Wilderness system more confluent and less fragmented. (4207.6)

PC # 5

Public Concern: The FS should revise the forest plans to address loss of soil productivity due to past management activities.

Sample Statement:

The proposed RPF would do nothing to address the pervasive cumulative damage to soil, and resulting loss of soil and land productivity, that has occurred due to past management, and would occur under the RFP's status quo future management, as required by Congress (5293.7)

PC # 6

Public Concern: The FS should develop a strategy to reduce the frquency of intense wildfires that impact soils, watersheds, and aquatic ecosystems. (The BNF) should add the following DCs:

- **Road access to forest lands would be maintained and extended as needed to allow the wide-spread application of Forest Restoration projects to restore historical conditions and reduce the threat of intense wildfires.**
- **Access to forest lands is necessary requirement for the practice of Restoration Forestry.**

Sample Statement:

Ch.1 - Vision Soils, Watersheds, and Aquatic Ecosystems: Intense wildfires damage the soil and delay natural succession by decades; they destroy riparian systems (e.g. Blue Joint, Little Blue Joint, Sleeping Child, Rye Creek, etc.); and contribute large quantities of fine-grained sediment to watersheds. Ch. 2 - Strategy Soils, Watersheds, and Aquatic Systems: Intense wildfires damage soils and watersheds and destroy riparian systems. Therefore, a strategy of reducing the frequency of intense wildfire is an objective that impacts soils, watersheds, and aquatic systems. (4079.4)

Sample Statement:

Ch. 1: Vision National Forest System Lands, pp.26-27: We recommend the addition o the following paragraph: Road access to forest lands would be maintained and extended as needed to allow the wide-spread application of Forest Restoration projects to restore historical conditions and reduce the threat of intense wildfires.Access and Travel Management, p. 30, par b: Access to forest lands is a necessary requirement for the practice of Restoration Forestry.Sapphire Geographic AreaThe proposal to make the sleeping Child area Backcountry Non-motorized 2.2a is perhaps the most onerous proposal contained in the entire BNF plan. This area is heavily loaded with forest floor fuels and the riparian areas have suffered severely from fire. This area is desperately in need of Restoration and Riparian Remediation - all of which requires motorized access. The high potential for intense fire, the traditional use of the area by motorcycles and snowmobiles, and the fact that it is entirely emphatically recommend this area be reclassified at 4.1 - Moderate Intensity Management.Access and travel management p.51: We thought trail-specific decisions were to be made during the Travel management Plan. For the record, we are opposed to including any decisions regarding Trail 313 in this Plan. (4079.5)

Sample Statement:

All these desired conditions for soil and water 9a-e) are adversely impacted by catastrophic fires. MFMU recommends the Plan address desired conditions needed to protect watersheds and riparian areas from holocaust fire effects and additional desired conditions for protection need to be added.Page 18, DC (f.). This is not a very realistic desired condition for Flathead Forest lands, when the impact of lake trout on bull trout originate in Flathead Lake outside of any control by the USFS. We recommend the statement be deleted.DC (g.). These desired riparian attributes are greatly harmed by catastrophic fire. MFMU recommend the addition of desired conditions that establish the need for a strong vegetation management and protection program to maintain desired watershed functions. (4933.13)

PC # 7

Public Concern: The FS should display the miles of listed stream in the LMPs, and provide more language that promotes improvement of water quality to support beneficial uses.

Sample Statement:

The Bitterroot NF contains important headwater streams and aqauatic habitat, and lands capable of providmg fish, wildlife and plant diversity on a large scale, as well as high quality recreational opportunities to meet growing demand for public recreation We believe it is particularly important for the long-term LMP to protectwater quality, riparian areas, wetlands and other aquatic habitats, and to promote water quality improvement and restoration of water quality to support beneficial uses where uses are currently impaired. This will help promote attainment of the Clean Water Act goal to restore and maintain the chemical, physical and biological integrity of the nation's waters. We did not see information on the number of waterbodies or stream miles on the Bitterroot NF that are listed by the State of Montana as impaired under Section 303(d) of the Clean Water Act in the LMP or the Plan Set of documents, but there are impaired waterbodies on the Forest (e.g., Moose Creek, Laird Creek, West Fork Bitterroot River, Overwhich Creek, Arnbrose Creek, Rye Creek, North Burnt Fork Creek, Sweathouse Creek, Tbreemile Creek, etc.,). Pollutant loads from National Forest lands that contribute to imuairment of 303(d) listed waters need to be reduced to promote restoration of support for designated beneficial uses in cooperation with State and EPA development of Total Maximum Daily Loads (TMDLs) and Water Quality Restoration Plans. The EPA and State of Montana are under a Court ordered schedule to develop and adopt TMDLs and Water Quality Restoration Plans. We very much appreciate the cooperation received from the Bitterroot NF in these efforts in the past, and anticipate continued Bitterroot NFcooperation and participation in such efforts. We believe it is important that the LMP to include direction to maintain and protect existing high quality waters, and promote restoration of impaired waters. (4664.1)

PC # 8

Public Concern: The FS should ensure that the LMPs are consistent with the Interagency MOA that relates to implementation of the ICB strategy - "A framework for incorporating the aquatic and riparian habitat components of the ICB strategy into forest plan revisions".

Sample Statement:

The EPA is also interested in assuring that the LMP revision for the Bitterroot NF, which is within the Interior Columbia Basin, is consistent with the provisions of the Interagency Memorandum of Understanding between the Forest Service, BLM, EPA, USFWS, and NMFS for Farest Service implementation of the Interior Columbia Basin Strategy on National Forest lands (referred to as the ICB Strategy, http://www.icbemp.gov/html/icbstrat.pdf and the "A Framework for Incorporating the Aquatic and Riparian Habitat Component of the Interior Columbia Basin Strategy into BLM and Forest Service Plan Revisions," http://www.icbemp.gov/html/aqrip7804.pdf (4664.2)

Sample Statement:

The EPA is also interested in assuring that the LMP revision for the Flathead NF, which is within the Interior Columbia Basin, is consistent with the provisions of the Interagency Memorandum of Understanding between the Forest Service, BLM, EPA, USFWS, and NMFS for Farest Service implementation of the Interior Columbia Basin Strategy on National Forest lands (referred to as the ICB Strategy, http://www.icbemp.gov/html/icbstrat.pdf and the "A Framework for Incorporating the Aquatic and Riparian Habitat Component of the Interior Columbia Basin Strategy into BLM and Forest Service Plan Revisions," http://www.icbemp.gov/html/aqrip7804.pdf (4665.2)

Sample Statement:
The EPA is also interested in assuring that the LMP revision for the Lolo NF, which is within the Interior Columbia Basin, is consistent with the provisions of the Interagency Memorandum of Understanding between the Forest Service, BLM, EPA, USFWS, and NMFS for Farest Service implementation of the Interior Columbia Basin Strategy on National Forest lands (referred to as the ICB Strategy, http://www.icbemp.gov/html/icbstrat.pdf and the "A Framework for Incorporating the Aquatic and Riparian Habitat Component of the Interior Columbia Basin Strategy into BLM and Forest Service Plan Revisions," http://www.icbemp.gov/html/aqrip7804.pdf (4666.2)

PC # 9

Public Concern: The FS should develop LMP objectives for watershed restoration that are more likely to attain desired conditions.

Sample Statement:
A general comment is that we have concerns regarding the ability of the proposed objectives, which we understand are the measurable and time-specific projections of Plan outcomes, to attain desired conditions for the resources. In particular, we have concerns that desired conditions for watersheds and aquatic species will not be attained based on proposed objectives, which we understand are driven by past performance and budgets (i.e., proposed objectives that identify watershed restoration activities and road system improvements appear to be inadequate to attain desired conditions for watersheds and aquatic species). We believe there is a need to strengthen the objectives to promote outcomes that are more likely to attain desired conditions. (4664.3)

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Sample Statement:
A general comment is that we have concerns regarding the ability of the proposed objectives, which we understand are the measurable and time-specific projections of Plan outcomes, to attain desired conditions for the resources. In particular, we have concerns that desired conditions for watersheds and aquatic species will not be attained based on proposed objectives, which we understand are driven by past performance and budgets (i.e., proposed objectives that identify watershed restoration activities and road system improvements appear to be inadequate to attain desired conditions for watersheds and aquatic species). We believe there is a need to strengthen the objectives to promote outcomes that are more likely to attain desired conditions. (4665.3)

PC # 10

Public Concern: The FS should clearly state that conservation watersheds are the population strongholds for listed or proposed species or local narrow endemics, and include a map in the plans that identifies these watersheds.

Sample Statement:

The draft Bitterroot Aquatic Strategy includes maps that identify conservation watersheds that serve as population strongholds for bull trout and westslope cutthroat trout. We suggest that the Plan clearly state that conservation watersheds are the population strongholds for listed or proposed species or local narrow endemic species, and that a map identifying conservation watersheds be included in the Plan (perhaps in the appendix); and that management will provide for the long- term stability, productivity, and biological diversity of such areas per the ICB Strategy. (4664.12)

Sample Statement:

The draft Lolo Aquatic Strategy includes maps that identify conservation watersheds that serve as population strongholds for bull trout and westslope cutthroat trout. We suggest that the Plan clearly state that conservation watersheds are the population strongholds for listed or proposed species or local narrow endemic species, and that a map identifying conservation watersheds be included in the Plan (perhaps in the appendix); and that management will provide for the long-term stability, productivity, and biological diversity of such areas per the ICB Strategy. (4666.12)

Sample Statement:

The draft Flathead Aquatic Strategy includes maps that identify conservation watersheds that serve as population strongholds for bull trout and westslope cutthroat trout. We suggest that the Plan clearly state that conservation watersheds are the population strongholds for listed or proposed species or local narrow endemic species, and that a map identifying conservation watersheds be included in the Plan (perhaps in the appendix); and that management will provide for the long- term stability, productivity, and biological diversity of such areas per the ICB Strategy. (4665.12)

PC # 11

Public Concern: The FS should reference "Incorporating source water protection in land management planning" in the LMPs; identify all source water protection areas and provide the necessary protection in the Geographic Area Desired Conditions; and incorporate the source water protection definition into the LMPs.

Sample Statement:

Incorporating Source Water Protection into Federal Land Management Planning Process Definitions: Source Water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source Water Protection Areas are areas delineated around sources of drinking water and mapped by the States for each Federally-regulated public water system. A Federally-regulated public water system provides water for human consumption through pipes or other constructed conveyances to at least 15 service connections or serves an average or at least 25 people for at least 60 days a year.[64 continues this comment] (4664.63)

Sample Statement:

[continued from 63]1. Identify Source Water Protection Areas within your land management area Look at the available data. Montana Dept. of Environmental Quality (MDEQ) Source Water Protection Staff identify the sources of drinking water including surface water and groundwater for Federally-regulated public water systems, and delineate the Source Water Protection Areas around each of these drinking water sources, and inventory significant potential contaminant sources within the protection areas. Source Water Protection Areas present on your land may be associated with public water systems that your agency owns/operates, or they may be for public water systems owned/operated by other entities. Source Water Protection Areas that overlap with your land management area may be associated with public water systems wells or surface water intakes that are physically located beyond the borders of your land area. All Source Water Protection Areas must be protected, regardless of who owns/operates the water system, or the physical location of the water system well or intake. Maps identifying Source Water Protection Areas for public water systems that are located on Federal lands and that have a completed Source Water Delineation and Assessment Report are available from the MDEQ. Source Water Assessments are available on the MDEQ website, http://deq.state.mt.us/wqinfo/swp/index.asp. Ask Montana Source Water Protection Program staff to determine whether you have all current information available at the time of your planning process. The list of active public water systems is subject to change as systems come on-line or go off-line, so it is best to check for up-to- date information. Montana Contact is Joe Meek at 406-444-4806. [65 continues this comment] (4664.64)

Sample Statement:

Ask the Montana contacts for information about State-regulated drinking water systems. These systems are smaller than those that fall under Federal drinking water regulations, but human health concerns are very real and their source of drinking water also should be considered when planning land use activities. 2. If Source Water Protection Areas are present in your land areas: Review the source water assessment completed by the State. Inventory potential contaminant sources within the Source Water Protection Area. Identify land management activities that might impact drinking water. Contact the public water system operator. Include the name and contact information for the water system operator in your plan. Work with the water system operator to determine when to notify the water system about activities that will be conducted on Federal lands Determine the types of activities they want to be notified about Determine an appropriate schedule for notification Determine other information sharing that should take place 3. Select appropriate BMPs to address decreasing the risk from all identified potential contaminant sources under your control. (A list of BMPs for Drinking Water Protection is available upon request.) 4. Involve the public Work with communities to ensure that the community is informed of planned projects Follow all appropriate NEPA protocols for informing the public 5. Monitor Address Source Water Protection Areas in monitoring plans If an activity within a Source Water Protection Area could negatively impact drinking water quality, then evaluate alternatives to mitigate the impact. (4666.65)

PC # 13

Public Concern: The BNF should do a better job of emphasizing soils throughout the LMP.

Sample Statement:

Strategy Objectives, Soils, Watersheds and Aquatic Ecosystems [BNF, p77]. Again, no mention of soils. Out of sight out of mind. (4990.35)

Sample Statement:

Soils swept away. We note a glaring lack of concern or discussion in the Vision about soils, the very foundation of terrestrial ecosystems. Desired conditions discussions do not mention soils even though soils are extensively damaged beyond legal limits in a number of geographic areas. The 'Strategy' discussion briefly mentions, in three sentences, soils under the Soils, Watersheds, and Aquatic Ecosystems section, but under 'Objectives Component' Soils, Watersheds and Aquatic Ecosystems there is no mention of soils. In Chapter 3: Design Criteria, guidelines component the only guideline regarding soils is "d. Soil and snow should not be sidecast into surface water." (p.111).This is very good and necessary but nowhere near sufficient. Standing alone, the statement really is ludicrous given that the extensive, seriously problematic soils compaction damage across much of the suitable timber land base. (4990.6)

PC # 14

Public Concern: The BNF should acknowledge water quality problems associated with existing roads.

Sample Statement:

[Regarding the statement on BNF Proposed Plan] Page 54: "The headwaters of the East Fork of the Bitterroot River flow from the Anaconda-Pintlar Wilderness, providing high quality water to the valley bottom." This statement fails to mention that the high quality East Fork water picks up enough sediment eroding off of Forest Service roads to be classified as impaired by the state of Montana by the time it reaches the valley bottom. (4990.25)

PC # 15

Public Concern: The FNF should include INFISH RMOs in the LMP.

Sample Statement:

It appears that the only portion of INFISH carried over into the PLMP are the definitions of Riparian Conservation Areas. There are no Riparian Management Objectives for pool frequency, water temperature, large woody debris, bank stability, lower bank angle or width/depth ratio. Nor is there a RMO for sediment even though that and water temperature are good indicators of bull trout habitat. (4924.8)

Sample Statement:

We had a hard time finding specific riparian and fisheries standards for the forest as a whole. Although we read about the forest's vision and desired condition, there does not seem to be specific standards for riparian setbacks, woody debris, pool frequencies, etc. We would highly recommend formally adopting INFISH standards forestwide. (5296.2)

Sample Statement:

We had a hard time finding specific riparian and fisheries standards for the forest as a whole. Although we read about the forest's vision and desired condition, there does not seem to be specific standards for riparian setbacks, woody debris, pool frequencies, etc. We would highly recommend formally adopting INFISH standards forestwide. (5295.2)

PC # 16

Public Concern: The FNF should address the aquatic questions in the AMS, then incorporate into the LMP.

Sample Statement:

The following are some of the decisions the AMS deemed important that still need to be addressed in the revised Forest Plan.Water Quality Decisions Needed: o How should current direction be strengthened to include more active restoration of watersheds? How can this be integrated with access management, and restoration of other ecosystem components (i.e. aquatic habitat, riparian, and upland forests)? o How can management direction be established that contributes to de-listing of 303(d) listed water bodies? o How can more specific management direction be developed for present and future lands that influence public water supplies? AMS at pgs. 4-36 (4924.34)

PC # 17

Public Concern: The FS should include a DC that would assure road density effects are managed to protect water quality and native fish, such as the following:"In conservation and active restoration watersheds, road density would be at a level that is favorable to water quality, bull trout and westslope trout."

Sample Statement:

We are pleased that the proposed language for the soils, watersheds, and aquatic ecosystems watersheds desired conditions (pages 14-16) includes the statement indicating that: water quality meets or exceeds applicable state standards and supports native amphibians and diverse invertebrate communities; along with statements regarding natural stream channels, floodplains, and aquatic habitat, and self-sustaining, well-distributed and well-connected bull trout and west slope cutthroat trout populations;road density for water quality, bull trout and westlope cutthroat trout. (4666.10)

Sample Statement:

"In conservation and active restoration watersheds, road density would be at a level that is favorable to water quality, bull trout, and westslope cutthroat trout." We recommend these types of desired conditions that address the adverse effects of too high a road density and too many road stream crossings upon watershed condition and aquatic health be considered for incorporation into the plan. (4665.20)

Sample Statement:

We encourage the Forest to consider inclusion of a desired condition that would assure that road density effects on watersheds and aquatic ecosystems are considered and managed to assure protection of fisheries resources and contribute to recovery of bull trout. (4664.13)

Sample Statement:

Also, since road densities are so important to watershed condition, wildlife habitat and overall ecosystem condition it would be helpful and pertinent to describe road density for each GA, and summarize effects of road density on ecosystem condition, and goals for road density reductions. (4666.28)

PC # 18

Public Concern: In the Program Emphases section, the FS should identify and prioritize the number of miles of 303(d) listed waters to be restored every 5 years.

Sample Statement:

Soils, Watersheds, and Aquatic Ecosystems Program EmphasisWe support the soils, watersheds, and aquatic ecosystems program emphasis on restoring water quality and stream habitats and working toward delisting of 303(d) listed impaired waterbodies, cooperating with other parties in multiple ownership watersheds to improve water quality and restore aquatic ecosystems, and reducing aquatic habitat fragmentation, and closing and obliterating roads with a high risk to water quality and aquatic habitat (pages 70-72). As part of this strategy, we believe water quality restoration activities for 303(d) listed waters should be developed and prioritized. The number of miles of waters from the 303(d) list to be restored within each 5 year portion of the 15 year plan life, should be included as well as discussion of ongoing in-stream monitoring to demonstrate achievement of improving trends and support of beneficial uses. We recommend setting 5 year watershed objectives within the plan in order to demonstrate the magnitude of improvement toward meeting desired conditions and state WQS for Flathead NF 303(d) impaired waters. (4982.9)

Sample Statement:

The Montana Nonpoint Source Pollution Management Plan (2006 working draft) calls for meeting State WQS within 5 years of completing and implementing Total Maximum Daily Loads (TMDLs) and Water Quality Restoration Plans. As the Montana schedule for completing TMDLs is 2012, the goal for achieving beneficial uses and meeting WQS for 303d listed waters (including waters on National Forest lands) is 2017. MT Code, Section 75-5-703(9) states: ... if the TMDL is not achieving compliance with applicable water quality standards within 5 years after approval of a TMDL, the department shall conduct a formal evaluation of progress in restoring water quality and the status of reasonable land, soil, and water conservation practice implementation to determine if the implementation of a new or improved phase of voluntary reasonable land, soil and water conservation practices is necessary. EPA Strategic Targets and Program Activity Measures (2006) also direct that states make progress toward achieving water quality standards. Objectives include: removing at least 5,200 of the specific causes of waterbody impairment identified by states in 2002; and by 2012 attaining water quality standards for all pollutants and impairments in more than 2,250 water bodies identified in 2002 as not attaining standards (cumulative). It is our understanding from recent discussions with USFS personnel that they must also provide an accounting of improving trends and de-listing of 303(d) waterbodies. The MT statewide goal for achieving beneficial uses by 2017 is congruent with Plum Creek's goal that all land and forest activities (including timber harvesting, road building, and land sales) achieve proper aquatic habitat conditions in Plum Creek's critical fish habitat watersheds within 10 years, by 2011. (4756.3)

Sample Statement:

While the proposed desired conditions for Soil, Watersheds and Aquatic Ecosystems for most part look good, the proposed Objectives (page 77) to move the Forest towards these desired conditions appear limited in comparison (4664.38)

Sample Statement:

The proposed Soils, Watersheds, and Aquatic Ecosystem Objectives (page 85) appear inadequate for moving towards Desired Forest Conditions. Is restoration of five to seven watersheds, improvement of hydrologic conditions on 10 to 20 miles of road, removing 20 to 40 native fish barriers, and reducing 20 to 40 sediment sources impacting water quality or aquatic habitat all that the Flathead NF can commit to during ten years of plan implementation? To what extent will proposed activities restore 303(d) listed waters? (As stated above, currently 10% of Flathead NF subwatershed area contains 303(d) listed waters). We believe water quality restoration needs for 303(d) listed waters should be assessed and prioritized. It would be desirable to estimate the number of miles of waters to be put on an improving trend, and miles of waters on National Forest managed lands to be restored through the 15 year Forest plan time period (4982.11)

PC # 19

Public Concern: The FS should develop a multi-resource approach to watershed restoration using a full spectrum of resource specialists and partnerships.

Sample Statement:

As watershed conditions have likely become degraded over several decades in providing multiple resource uses, an integrated multi-resource approach to watershed restoration would be beneficial. This approach should incorporate resources and techniques from timber, engineering, range, minerals, and recreational programs, as well as partnerships across land owners and cooperating agencies. A full spectrum of resource uses and partnerships are needed to effectively restore watershed health. The responsibility for watershed restoration must be shared by all resource uses. (4982.12)

PC # 20

Public Concern: The FS should assure that desired aquatic habitat features are required; not aspirational.

Sample Statement:

There is concern that the proposed LMP may be weakening INFISH protections since it is our understanding that desired conditions are "aspirational," subject to budget limitations, and not commitments to action. In addition, the Chapter 3, Guidelines Component states that "a project or activity will apply relevant guidelines, unless there is a documented reason to adjust the guideline" and "the Responsible Official will describe the proposed adjustment and explain the relationship to desired conditions" (page 125). Does this mean that abiding by the current mandatory INFISH guidance will be left up to the judgment of "responsible officials"? We are pleased that the proposed riparian guidelines (page 125) indicate that management activities should promote a trend toward desired conditions, but it is not clear to us if this direction is as binding as INFISH Objectives, Standards and Guidelines in prior Plans. We suggest that a riparian management objective be incorporated into soils, watersheds, and aquatic ecosystems objectives (page 85) to assure that habitat features identified in the desired conditions are required. For example: Flathead NF activities over the life of the plan will promote maintenance and attainment of watershed, riparian, and aquatic habitat and aquatic species desired conditions. (4982.13)

PC # 21

Public Concern: The FS should add the following guideline: For management activities in watersheds containing 303(d) listed waters where TMDLs and assocaited water quality restoration plans have been adopted, the activities should be consistent with water quality targets in the adopted TMDLs and assocaited water quality restoration plans.

Sample Statement:

We do suggest that where there are proposed management activities in watersheds of 303(d) listed waters, and Total Maximum Daily Loads (TMDLs) and Water Quality Restoration Plans have been adopted for the listed waters (i.e., TMDLs prepared by the State/EPA to promote long-term restoration of full support of beneficial uses), that the management activities should be carried out consistent with water quality targets in the adopted TMDL and associated water quality restoration plans. We suggest adding this to proposed guideline b) as follows: b) "When RCAs are not intact and functioning at desired condition, then management activities should include restoration components that exceed full compensation for project fleets to promote a trend toward desired conditions. For management activities in watersheds of 3031d) listed waters where TMDLs and associated water quality restoration plans have been adopted, the activities should be consistent with water quality targets in the adopted TMDLs and associated water quality restoration plans. " (4664.52)

Sample Statement:

[In] Chapter 3 Design Criteria: We recommend that where there are proposed management activities in watersheds of 303(d) listed waters, and Total Maximum Daily Loads (TMDLs) and Water Quality Restoration Plans have been adopted for the listed waters, that the management activities be carried out consistently with the water quality targets in the adopted TMDL. We suggest adding this to proposed guideline b) as follows: When RCAs are not intact and functioning at desired condition, then management activities should include restoration components that exceed full compensation for project effects to promote a trend toward desired conditions. For management activities in watersheds of303(d) listed waters where TMDLs and associated water quality restoration plans have been adopted, the activities should be consistent with water quality targets in the adopted TMDLs and associated water quality restoration plan. (4735.13)

Sample Statement:

We recommend that where there are proposed management activities in watersheds of 303(d) listed waters, and Total Maximum Daily Loads (TMDLs) and Water Quality Restoration Plans have been adopted for the listed waters, that the management activities be carried out consistently with the water quality targets in the adopted TMDL. We suggest adding this to proposed guideline b) as follows:When RCAs are not intact and functioning at desired condition, then management activities should include restoration components that exceed full compensation for project effects to promote a trend toward desired conditions. For management activities in watersheds of 303(d) listed waters where TMDLs and associated water quality restoration plans have been adopted, the activities should be consistent with water quality targets in the adopted TMDLs and associated water quality restoration plan. (4982.14)

PC # 22

Public Concern: The FNF should provide a high degree of protection for public water supplies in Haskill Creek, Essex Creek, and Cedar Creek.

Sample Statement:

Finally, A-Closed and A-1 classified watersheds on the Flathead NF (Haskill Creek, Essex Creek, and Cedar Creek) warrant a high level of water quality protection. Activities within A-Closed and A-1 watersheds that serve as public water supplies should be coordinated with local governments and MT DEQ to ensure that activities in these watersheds are consistent with local government and state requirements.Thank you for the opportunity to comment on this plan. Either myself (444-5319) or my staff are available to further discuss any ideas or comments. (4982.15)

PC # 23

Public Concern: The FNF should describe how RCAs will be designated and how the course filter and fine filter strategies will be applied.

Sample Statement:

How and when "riparian conservation areas" will be designated should be clearly described in the plan. Criteria for designating the RCAs should be included as well. Also the "guidelines and suitability designations," "Montana Best Management Practices," and "Soil and Water Conservation Practices' should be included in an appendix. How and when the "coarse" and "fine" filters for aquatic ecosystem protection would be applied should be fully discussed. (5237.4)

PC # 24

Public Concern: The FNF should strengthen the plan by establishing clear connections between resource needs, objectives, desired conditions, and evaluation to ensure protection and improvement of water quality and other resources.

Sample Statement:

We encourage you to strengthen the plan by making the needed connections between resource needs, objectives, desired conditions, and evaluation and accountability to ensure that the plan will result in protecting and improving water quality and the many other resources and amenities the Flathead National Forest provides. (5237.5)

PC # 25

Public Concern: The FNF should have a more balanced emphasis between soils, watersheds, and fish throughout the plan.

Sample Statement:

Soils, Watersheds, and Aquatic Resources [FNF p 16]: This section is about fish, not about watersheds or soils. This is a good place to point out that soils and aquatic resources are part of watersheds. The fisheries is a function of all water, soils, and vegetation. This is oversimplification but my point is that these three items should have separate paragraphs, not all be included in a discussion of fish. (5259.16)

PC # 26

Public Concern: The LNF should protect reference streams in the Great Burn from motorized use and timber harvest.

Sample Statement:

Streams in the Great Burn are being used as reference streams for state water quality benchmarks by the MT Dept of Environmental Quality (check with Mike Suplee of DEQ about these streams). Hence it is important to protect them from the impacts of motorized use & timber harvest. (4213.5)

PC # 29

Public Concern: The FS should cite the reference to State Water Quality Standards in the desired conditions.

Sample Statement:

We support the desired condition statement to "meet or exceed state WQS and support native amphibians and diverse invertebrate communities," along with statements regarding natural stream channels; floodplains; aquatic habitat; and well-distributed and connected bull trout and westslope cutthroat trout populations. We recommend that Montana WQS be cited as the applicable state standards in item c, page 17. (4982.6)

Sample Statement:

Chapter 1. VisionForest-wide Desired Conditions:Soils, Watersheds, and Aquatic Ecosystems Desired Conditions We support the desired condition statement to "meet or exceed state WQS and support native amphibians and diverse invertebrate communities," along with statements regarding natural stream channels; functional floodplains; and well-distributed andconnected bull trout and westslope cutthroat trout populations. We recommend that Montana WQS be cited as the applicable state standards in item c, page 17. (4735.6)

Sample Statement:

We recommend that the concept of restoring impaired waters be incorporated into the desired conditions to make it more consistent with the Clean Water Act, ICB Strategy and Bitterroot Aquatic Strategy. For example, we suggest adding language to proposed desired condition c) as follows: c) "Water quality meets or exceeds applicable state standards (ARM 17.30 Subchapters 6 and 7) and supports native amphibian and diverse invertebrate communities. Where existing water quality is impaired (i.e.. listed by the State under Section 303(d) of the Clean Water Act) management will promote water quality improvements that trend toward restoration of full support of beneficial uses, and delisting of 303(d) listed waters." (4666.11)

PC # 30

Public Concern: The FS should protect water bodies that are naturally fishless and cease fish stocking.

Sample Statement:

The discussion of aquatic resources focuses solely on fish, ignoring the vast majority of aquatic species important to the Forest ecosystems. While fish might be a good indicator of the health of some aquatic ecosystems, they are an invasive species in others. Many of the lakes and streams on the Bitterroot Forest are naturally fishless. The health of the native biota in these areas needs to be determined and protected. Moreover, fish stocking should cease. (4981.2)

Sample Statement:
The discussion of aquatic resources focuses solely on fish, ignoring the vast majority of aquatic species important to the Forest ecosystems. While fish might be a good indicator of the health of some aquatic ecosystems, they are an invasive species in others. Many of the lakes and streams on the Lolo National Forest are naturally fishless. The health of the native biota in these areas needs to be determined and protected. Moreover, fish stocking should cease. (5206.2)

Sample Statement:
The discussion of aquatic resources focuses on fish, ignoring the vast majority of aquatic species important to the Forest ecosystems. While fish might be a good indicator of the health of some aquatic ecosystems, they are an invasive species in others. Many of the lakes and streams on the Flathead National Forest are naturally fishless. The health of the native biota in these areas needs to be determined and protected. Moreover, fish stocking should cease. (4983.2)

PC # 31
Public Concern: The FS should describe resource impacts of existing roads and trails in the "background".

Sample Statement:
The background information [BNF, Ch. 1, Pg. 16] should disclose that existing legacy roads and trails (i.e., older roads and trails that have existed on the landscape for a long period of time) are causing resource damage and represent the greatest source of impact to watersheds. The background information should also quantify the number of legacy roads that are potentially causing resource damage. (5792.9)

Sample Statement:
The background information [LNF Ch. 1, Pg. 14] should disclose that existing legacy roads and trails (i.e., older roads and trails that have existed on the landscape for a long period of time) are causing resource damage and represent the greatest source of impact to watersheds. The background information should also quantify the number of legacy roads that are potentially causing resource damage. (5792.53)

Sample Statement:
The background information [FNF Ch. 1, Pg. 16] should disclose that existing legacy roads and trails (i.e., older roads and trails that have existed on the landscape for a long period of time) are causing resource damage and represent the greatest source of impact to watersheds. The background information should also quantify the number of legacy roads that are potentially causing resource damage. (5792.94)

PC # 32
Public Concern: The FS should quantify the number of fish barriers in the background section.

Sample Statement:
Soils, Watershed, and Aquatic Ecosystems: It would be useful to know the current total miles of road affecting RAC's and their identifying number and location on a map. This would provide context for the proposed 10-20miles of road proposed for improved hydrologic conditions. (4980.41)

Sample Statement:
The background information [BNF Ch. 1, Pg. 16] should quantify the number of culverts that are barriers to native fish migration. The Lolo plan provides this detail. (5792.10)

Sample Statement:
The background information [FNF Ch. 1, Pg. 17] should quantify the number of culverts that are barriers to native fish migration. The Lolo plan provides this detail. (5792.95)

PC # 33
Public Concern: The FS should include a DC to minimize the impact of legacy roads through BMPs and decommissioning.

Sample Statement:
The forest-wide desired conditions [FNF Ch. 1, Pg. 17] should include a desired condition to minimize the impact of legacy roads through implementation of BMPs and decommissioning of problem roads. See Logan, R. 2001. Water Quality BMPs for Montana Forests. EB158, 2001. MSU Extension Publications, Bozeman MT 59717. (5792.96)

Sample Statement:
The forest-wide desired conditions [LNF Ch. 1, Pg. 15] should include a desired condition to minimize the impact of legacy roads through implementation of BMPs and decommissioning of problem roads. See Logan, R. 2001. Water Quality BMPs for Montana Forests. EB158, 2001. MSU Extension Publications, Bozeman MT 59717. (5792.54)

PC # 34
Public Concern: The FS should specify the natural ranges of instream habitat features in the DCs.

Sample Statement:
This desired condition [BNF Ch. 1, Pg. 18, Item g] should specify the goal of providing levels within a natural range of conditions (e. g., provide natural ranges of woody material for in-stream fish habitat and channel form and function [stability, sediment storage, etc.]) (5792.12)

PC # 35
Public Concern: The FS should provide a full range of instream habitat features in the DCs, and not provide minimum values within the ranges.

Sample Statement:
This desired condition [LNF Ch. 1, Pg. 15, Item g] should specify the goal of providing levels within a natural range of conditions (e.g., provide natural ranges of woody material for in-stream fish habitat and channel form and function [stability, sediment storage, etc.]) (5792.55)

Sample Statement:
The desired future conditions [BNF Ch. 1, Pg. 18] for in-stream habitat features (per the Plan Set of Documents) are not based on providing a full range of natural conditions. By managing for the minimum conditions to be above the mean reference conditions, the desired future condition is skewed toward the high end of the range. That high end of reference conditions is likely not achievable in all situations, nor is it necessarily the best condition for an ecosystem. The goal should be to manage for in-stream habitat features within the full natural range of conditions as determined by reference reaches. (5792.13)

PC # 37

Public Concern: The FNF should more accurately describe how (and when) bull trout populations have decreased.

Sample Statement:

Soils, Watersheds and Aquatic Resources. Background [FNF Page 16]. First bullet. Monitoring data in the Flathead does not support the "steady decline in bull trout and westslope cutthroat" statement. Populations were strong until mysis shrimp introduced into the Flathead system in the late 1960's by the MT Dept. of Fish Wildlife and Parks fully colonized Flathead Lake. The facts show a precipitous decline in the late 1980's and early 1990's after the bull trout and lake trout kokanee prey base was lost due to the exotic shrimp consuming the kokanee's phytoplankton food source. Without kokanee, lake trout began to migrate up the Flathead river in pursuit of whitefish prey, and they also consumed the young bull trout and cutthrout attempting to migrate from nursery streams back to Flathead Lake. The massive increase in Flathead lake trout predation on native trout caused bull trout and cutthroat populations to plummet. MFMU recommends that actual monitoring data on bulltrout be disclosed. (4933.11)

PC # 38

Public Concern: The FNF should acknowledge the role of Hungry Horse Dam in protecting bull trout from lake trout in Flathead Lake.

Sample Statement:

Soils, Watersheds and Aquatic Resources. Background [FNF Page 16]. Second Bullet. The strong, stable populations of bull trout in the South Fork is due to the fact that Hungry Horse Dam protected these populations from the Flathead lake trout predation and this fact should be part of the "background" on fisheries resources. It is unfair not to mention the fact that strong, stable populations of bull trout also exist in the Swan River drainage, one of the heaviest logged major drainages in Montana. The Swan River population is also protected from migratory Flathead lake trout predation by the dam at Bigfork. MFMU recommends that information on Swan River bull trout be added. On Page 17, second bullet. The "impaired" stream reach listing is misleading, when the true background facts revealed by MT Department of Environmental Quality studies have shown that the majority of the streams in the listings they have studied were spurious listings not supported by any credible data, the streams were normal. MFMU recommends the statement should be deleted or the actual results of DEQ studies should be disclosed as background information.Continue on to 13 (4933.12)

PC # 39

Public Concern: The FNF should acknowledge strong bull trout populations in the Swan sub-basin.

Sample Statement:

The "impaired" stream reach listing [FNF Page 17] is misleading, when the background facts revealed by MT department of Environmental Quality studies have shown that the majority of the streams in the listing they have studied were spurious and not supported by any credible data, the streams were normal. The statement should be deleted or the actual results of DEQ studies should be disclosed as background information. (5788.11)

PC # 41

Public Concern: The FNF should develop DCs that establish the need for a strong vegetation management program to maintain desired watershed functions and RCAs.

Sample Statement:

These desired conditions [FNF Page 17] for soil and water are adversely impacted by past major fires. The plan should address desired conditions needed to protect watersheds and riparian areas from these fires effects and additional desired conditions for protection need to be added. (5788.12)

Sample Statement:

These riparian attributes [FNF DC Page 18 (g)] are greatly harmed by wind and heavy fuel driven fires. The addition of desired conditions that establish the for a strong vegetation management and protections program to maintain desired watershed functions is recommended. (5788.14)

PC # 42

Public Concern: The FNF should delete the DC about impacts of lake trout on bull trout because this is outside the control of the Forest Service.

Sample Statement:

This is not a very realistic desired condition [Page 18, DC (f)] for Flathead Forest lands, when the impact of lake trout on Bull Trout originate in Flathead Lake outside of any control by the USFS. It is recommended the statement be deleted. (5788.13)

PC # 43

Public Concern: The LNF shouild designate more 3.3 in the Lolo Creek watershed because this MA is more compatible with enhancing the recreational, wildlife, historic, and scenic values and more consistent with desired conditions of the area.

Sample Statement:

We [Lolo Watershed Group] believe that the proposed land designations of MA 5.2 (Residential Forest Intermix) and 4.1 (General Forest Moderate Intensity Management) within the three-mile-wide upper Lolo Creek corridor will contribute to degrading the recreational, scenic, historic, and wildlife habitat quality of the upper Lolo Creek basin.In contrast, designating these lands MA 3.3 (General Forest Low Intensity Management) would enhance and protect the recreational, scenic, wildlife, and historic values the LNF has already been working so hard to maintain. This would create a three-0mile-wide corridor devoted to maintaining these resources along Lolo Creek from Davis Creek to Lolo Pass (Appendix 3). (4110.7)

Sample Statement:

Lolo Creek Corridor from Davis Creek to Granite Creek (Lolo Hot Springs): We applaud the LNF's proposal to designate a narrow corridor along this stretch as Recreational (MA 6.1). However, we have serious concerns regarding the proposal to designate as MA 5.2 (Residential Forest Intermix) another mile on either side contiguous with the MA 6.1. (Map, Appendix 3). As an alternative, we propose for your consideration that these lands be designated as MA 3.3 (General Forest Low Intensity Management). We believe that this designation would be more consistent with the objectives of the Proposed Plan and the objectives as stated in Desired Conditions for the Lolo Creek Geographic Area. Moreover, it would be supportive of the LWG's recent efforts, working in collaboration with the LNF, to enhance land management in the drainage. These include a trout habitat enhancement project completed in 2005 at the Earl Tennant site and a proposal to create an Earl Tennant Special Area (Appendix 2). (4110.1)

Sample Statement:

[W]e [Lolo Watershed Group] support the LNF's proposal to designate a narrow corridor along this stretch as Recreational (MA 6.1). However, we have serious concerns regarding the proposal to designate as MA 4.1 (General Forest Moderate Intensity Management) another mile on either side contiguous with the MA 6.1 (Map, Appendix 3). As an alternative, we propose for your consideration that these lands be designated as MA 3.3 (General Forest Low Intensity Management). MA 4.1 (General Forest Moderate Intensity Management) generally reflects "an intensively managed landscape where human influence is evident ", "Vegetation management activities, roads and evidence of other developments are apparent", "these areas are suitable for regularly scheduled timber production and salvage logging". This level of management intensity seems incompatible with the LNF's other goals as stated in the Land Management Plan regarding historic, recreation, wildlife and scenic values. The concerns as set forth in the previous section regarding the corridor from Davis Creek to Granite Creek apply here as well. (4110.5)

Sample Statement:

It is our position that a designation of MA 3.3, General Forest Low Intensity Management would be more compatible with enhancing the recreational, wildlife, historic and scenic values as we have presented. MA 3.3 maintains Desired Conditions that include: "Low intensity, mixed use areas that would have a combination of fish and wildlife habitat, an assortment of recreational opportunities, and a variety of other goods and services; predominantly natural-appearing environments, landscapes appear slightly managed. These areas are not suitable for regularly scheduled timber production, although timber harvesting or salvage logging, for multiple-use purposes and to achieve desired vegetation conditions could occur" (LNFLMP, p. 119). (4110.4)

PC # 44

Public Concern: The FS should provide full citations for documents referred to in the LMPs.

Sample Statement:

Full citations should be provided for every document referred to in these plans. (5792.22)

PC # 46

Public Concern: The BNF should add an objective to "reduce a minimum quantity (e.g. 30) of sediment sources in 10 years.

Sample Statement:

Add an objective [BNF Ch. 2, Pg. 77] to reduce a minimum quantity (e.g., 30) sediment sources that are impacting water quality and/or aquatic habitat within ten years of Plan implementation. (5792.29)

PC # 47

Public Concern: The BNF should add an objective for stream and riparian improvement.

Sample Statement:

Add an objective [BNF Ch. 2, Pg. 77] to make improvements such as bank stabilization, riparian planting, or placement of woody material on a minimum quantity (e.g., 30 miles) of streams and riparian habitat in active restoration watersheds within ten years of plan implementation (5792.30)

PC # 48

Public Concern: The FNF should acknowledge the number of watersheds that are "functioning at risk or unacceptable risk" to bull trout due to densities and locations or roads.

Sample Statement:

" Nowhere does the DRP address the fact that its own Revision data shows that 58% of the Flathead's 79 bull trout sub-watersheds (6th-Code HUCs) are functioning at risk or unacceptable risk to bull trout due to densities and locations of roads (4542.29)

PC # 49

Public Concern: The FNF should provide direction on culvert removal as it relates to road decommissioning.

Sample Statement:

Page 132 [FNF Proposed Plan] says that when roads are closed to wheeled motor vehicles, stream crossings should be evaluated and treated, if necessary, to minimize or avoid failure. None of these "treatments" mention culvert removal and site restoration, however, which is required by A19 on all grizzly security closures. On P: 133 (f) we see that decommissioned roads are then discussed for "winter motorized routes." This is totally unacceptable. Decommissioning should mean no use. If the Flathead doesn't intend to do this, it must count these routes against A19 standards for Open and Total Route Densities. (4938.32)

Sample Statement:

Amendment 19 requires that all stream-bearing culverts be removed from decommissioned roads, yet the DRP provides no such requirement and instead suggests everything will be just fine with unspecified numbers of culverts left in place. (4542.31)

PC # 50

Public Concern: The FNF should identify which watersheds to concentrate restoration objectives in.

Sample Statement:

The Objectives Component does not disclose what methodology will be used to determine which watersheds will receive restoration, hydrologic improvements, native fish passage removals, or sediment source reductions. Will this be timber sale driven? Will it be based on WQLS status? Will it be based on the presence of native fish? We don't know because there are no parameters or standards for determining whether aquatic ecosystems are functioning appropriately and what needs to be corrected. (4924.6)

PC # 51

Public Concern: The FNF should add an objective for stream and riparian improvement.

Sample Statement:

Add an objective [FNF Ch. 2, Pg. 85] to make improvements such as bank stabilization, riparian planting, or placement of woody material on a minimum quantity (e.g. 30 miles) of streams and riparian habitat in active restoration watersheds within ten years of plan implementation. The Lolo NF plan includes this commitment. (5792.116)

PC # 52

Public Concern: The FS should identify minimum targets for objectives rather than a range to provide more clear direction and expection.

Sample Statement:

Objectives should provide minimum targets rather then a fixed range (e.g., close or obliterate a minimum of 15 miles of road versus close or obliterate 10 to 20 miles). This will provide more clear direction on the expected accomplishment level, yet provide flexibility to capitalize on additional opportunities. As presented, the high end of the range appears to be a cap that may limit opportunities for greater accomplishments. (5792.72)

PC # 53

Public Concern: The LNF should have an objective to reduce sediment sources.

Sample Statement:

Add an objective [LNF Ch. 2, Pg. 93] to reduce a minimum quantity (e.g., a minimum of 30) sediment sources that are impacting water quality and/or aquatic habitat within ten years of Plan implementation. The Flathead NF plan includes this commitment. (5792.73)

PC # 54

Public Concern: The BNF should designate the Martin Creek area with lower intensity MAs to safeguard water quality in the East Fork, which is already impaired.

Sample Statement:

It is geologically unstable and there is a need for a 3.3 buffer for the RNA on the Lolo NF. McClain Creek is in category 5 for imposed waters on the BNF, with a TMDL required (as of 2004) due to roads, stream bank destabilization and other reasons. Martin Creek drainage, another large roadless area, is slated for MA 5.1/3.3. Could this area be managed at a lower intensity to safeguard the East Forks already impaired waters? Martin Creek is a large tributary of the East Fork. Extensive logging at a "high" intensity will certainly further impair the East Fork. 5.1 implies new roads in this extensive roadless area, leading to further soil impacts, water impairment and weed infestation. The BNF's budget does not allow for maintenance of more permanent roads. This could also lead to further user conflict and degradation to the Sapphire WSA due to its proximity. This problem is clearly seen on the East Fork Geographic Area map. There needs to be at least an extensive 3.3 buffer (more than what's proposed). There would be significant degradation to this area if the proposed MA level stand as is. (4146.8)

PC # 55

Public Concern: The BNF should change the MA designation around Lake Como from 5.1 to 3.3 to protect scenic and watershed values.

Sample Statement:

I would make the following recommendations:MA 5.1 around Lake Como should be changed to 3.3 to protect the watershed and view shed since 85,000 visitors use this recreation area yearly. The upper end of the Lake should be 2.2a. (5109.3)

PC # 56

Public Concern: The FNF should designate the Coal Creek and Big Creek drainages with lower intensity MAs to protect water quality.

Sample Statement:

The Service has admitted that the Coal Creek Drainage (as well as Big Creek) is an impaired waterway due to past logging and roading, yet before the problem has been corrected, the Plan proposes more low and moderate intensity logging in the area. This seems like a questionable decision by an agency entrusted to protect the resource base. (4938.51)

PC # 57

Public Concern: Swan--The FNF should designate the area, including acquired corporate lands, around Lindbergh Lake as Backcountry not for timber production or other exploitative purposes, in order to protect watershed and wildlife habitat.The Forest Service should add the designated lands to recommended wilderness and designate certain areas as non-motorized (5051-7)

Sample Statement:

I strongly believe that the following Lolo & Flathead National Forest lands adjoining certain areas around Lindbergh Lake & the Mission Mountain Wilderness should be designated as wilderness (please refer to maps submitted by the Lindbergh Lake Homeowners Association with their comments);1. Lindbergh Lake Addition - Mission Mountain Wilderness, Flathead, Forest Swan Lake Ranger DistrictPart of Section 11 South of Lake inlet Section 2, 3, 4, 34, 35, 27, 22, 142. Sunset Peak Addition - Mission Mountain Wilderness Flathead Forest, Swan Lake Ranger District Part of Sections 8, 7, 12, 14, 13, 18, 17Lolo Forest Seeley, Lake District Part or all of Section 14, 13, 18, 17, 23, 24, 19, 27, 26, 25, 303. Elk Creek Addition - Mission Mountain Wilderness, Flathead Forest, Swan Lake Ranger DistrictSection 13, South ? of 17, 18, 19, 20, 29, 32I also believe that the existing trails, located in the above land sections, should be managed fro non-motorized recreation. (5051.7)

Sample Statement:

As you are aware, the land owners on Lindbergh Lake worked closely with the Forest Service and the Trust for Public Lands in the moving these lands from Plum Creek corporate holding into public ownership. I believe the update of the Forest Plan affords the opportunity to continue that stewardship effort to its logical conclusion through backcountry designation. By doing so, the pristine watershed that has headwater impacts throughout the entire Swan River drainage will be protected. While I am not a biologist and speak specifically to species impacts, it would seem obvious that there would be significant benefits to terrestrial wildlife, along with accompanying avian and fishery benefits. (5045.2)

Sample Statement:

Lindbergh Lake Area: The acquisition intended to conserve these corporate timberlands for perpetuity; I strongly disagree that these lands should be managed for timber production or other exploitative purposes. Wilderness will protect these lands as the acquisition intended. (4381.4)

Sample Statement:

Lindbergh Lake: We always enjoyed the idea that somewhere around were grizzly bears and maybe even wolves. I would like to see the undeveloped areas around the lake designated as backcountry at the very least (5047.1)

Sample Statement:
I believe there now exists an opportunity to provide long-term resolution and protection to critical watershed and wildlife habitat adjacent to the Lindbergh Lake. Specifically, I would like to see the east, south, and west sides of Lindbergh Lake be designated as backcountry. My first preference for those lands would be wilderness, but I suspect that backcountry is more a workable and attainable designation. I don't have a plat map before me, but I believe these lands include all of, or portions of, sections 2, 3, 22, 23, 24, 26, 27, 34, and 35 on the east, south and west sides of the lake. (5045.1)

PC # 59

Public Concern: The LNF should designate the Cotton, Dunham, and Monture Creeks as "Low Intensity" or "Special Management" to protect important bull trout spawning habitats.

Sample Statement:
North Fork Blackfoot GA (pp. 64-66)As written, the Desired Future Condition for the Watersheds and Aquatic Habitat components look pretty good. These cover (in a very summary manner) the primary fisheries issues (bull trout and westslope cutthroat trout) for the streams therein. However, we believe the "Management Area" classification (per the map) for these important native fish streams is somewhat inconsistent with the stated Desired Future Condition. We are particularly concerned about the "General Forest Moderate Intensity Management 4.1" classification for Cotton, Dunham and Monture Creeks. We recommend that as ESA-designated critical habitat, these stream corridors should be under a "low" intensity or "special management" classification, particularly for Dunham and Monture Creeks, both of which contain critical bull trout spawning sites within the moderate category. These streams should be managed in the most sensitive manner possible. (5245.22)

PC # 60

Public Concern: The FS should adopt the State SMZ and BMP standards instead of INFISH standards.

Sample Statement:
Stream crossings and fish passage proposed strategies should follow current streamside management zone laws, best management practices and 310 permit requirements by the state of Montana. (4192.3)

Sample Statement:
Potential riparian area management on FNF should be less rstrictive and include more management. The Montana Streamside Management Zone (SMZ) Law and Montana's Best Management (BMP) should be the frame work for forest management. INFISH standards were meant to only be temporary and aren't very effective. Managing riparian areas using BMPs and SMZ laws water quality and the riparian ecosystem can be proteted and still conduct timber management activities (4265.10)

Sample Statement:
The Montana Streamside Management Zone (SMZ) law, Montana's Best Management Practices (BMPs) and stream crossing permits should remain the framework for management of the Riparian Conservation Areas (RCAs). Previously adopted INFISH standards were only meant to be a temporary adoption while the standards were being analyzed. It is important to assimilate only those standards that support the SMZ, BMP and stream crossing permit criteria as guidelines in managing a class I, II, or III stream. (4925.11)

PC # 61

Public Concern: The FS should carry over INFISH standards and guidelines.

Sample Statement:

We wish to ensure that all INFISH standards and guidelines are retained in the management plans on all three Forests. Riparian Management Objectives for pool frequency, water temperature, large woody debris, bank stability, lower bank angle or width/depth ratio, and sediment are critical indicators of aquatic health. (4989.23)

Sample Statement:

The Flathead NF may want to consider the following as potential guidelines in the event that hydropower or water development appears likely: "Require instream flows and habitat conditions for hydroelectric and other surface water development proposals that maintain or restore riparian resources, favorable channel conditions, fish passage, & reproduction and growth. Coordinate this process with the appropriate state agencies. During re-licensing of hydroelectric projects, provide written and timely license conditions to the Federal Energy Regulatory Commission (FERC), that require fish passage and flows and habitat conditions that maintain/restore riparian resources and channel integrity. Coordinate re-licensing projects with the appropriate state agencies." "Locate new hydroelectric ancillary facilities outside RCAs. For existing ancillary facilities inside the RCA that are essential to proper management, provide recommendations to FERC to assure that the facilities would not prevent attainment of the soils, watersheds and aquatic habitat desired conditions and that adverse effects on inland native fish and aquatic species of concern are avoided. Where these desired conditions cannot be met, provide recommendations to FERC that such ancillary facilities should be relocated. Locate, operate, and maintain hydroelectric facilities that must be located in Riparian Habitat Conservation Areas to avoid effects that would retard or prevent attainment of the soils, watersheds and aquatic habitat desired conditions and avoid adverse effects on inland native fish and aquatic species of concern. " (4665.55)

Sample Statement:

Compared with the previous Forest Plan, there are very few standards, specific guidelines or lines on the map regarding protection of stream corridors and watersheds. The plan appears to be centered on achieving the "desired condition" in various areas. This approach can be effective, but is much more susceptible to mandates, politics and subjectivity. For fisheries and stream protection, the Land Management Plan should not allow for the possibility of relaxing current INFISH standards. (5245.1)

PC # 62

Public Concern: The FS should define "intact and functioning" in the RCA guidelines.

Sample Statement:

These guidelines require clarification on what defines "intact and functioning at item a and b desired conditions." There should be criteria for the functioning or non-functioning determination. The desired conditions should be defined for each element, and the target should be the natural range of variability. (5792.45)

Sample Statement:

The Guidelines are equally vague referring to "intact and functioning" riparian conservation areas yet there is no criteria as to what constitutes intact and functioning. (4924.7)

PC # 63

Public Concern: The FS should develop a guideline that prioritizes stream crossing improvements, based on fish species status and genetics.

Sample Statement:

Add a guideline that stream crossings improvements should be prioritized by habitat value, status of the species, and species genetics, and should be coordinated with other efforts within the watershed. (5792.88)

PC # 64

Public Concern: The FS should clarify the guideline related to stream crossing structure design to only apply to permanent crossings (not temp crossings).

Sample Statement:

Clarify if this guideline [Ch. 3, Item e] applies to temporary structures. If so, this design standard is too high. The higher design standard could potentially create more disturbance than necessary for a short-term, temporary installation. (5792.47)

PC # 65

Public Concern: The FS should clarify that the guideline related to MIST in RCAs refer to "fire" suppression.

Sample Statement:

Clarify that this guideline [Ch. 3, Item h] refers to fire suppression tactics. (5792.127)

PC # 66

Public Concern: The FS should edit the aquatic guideline related to projects in active restoration watersheds to include all projects regardless of size (acres).

Sample Statement:

Why limit restoration activities [Ch.3, SWAAE, Item k] within the limited set of active management watersheds to projects over 1,000 acres? Nearly any size project within these watersheds can provide an opportunity for implementation of restoration activities. (5792.91)

PC # 67

Public Concern: The FS should consider an additional aquatic guideline to assure coordination with other governments associated with municipal watersheds.

Sample Statement:

You may want to consider including a guideline to assure appropriate intergovernmental coordination of Flathead NF activities within municpal wathersheds. (4665.53)

PC # 68

Public Concern: The FS should change the aquatic guideline that says hazard trees should be left on site in RCAs. This determination should be made on a site-specific basis.

Sample Statement:

MFMU recommends this item [FNF P. 126, Item i.] should be dropped because it is an inappropriate blanket prohibition that will not be the right thing to do in all situations. Decisions regarding removal of a tree is a site-specific decision that should be left to experts on ground. (4933.47)

Sample Statement:
This item [FNF P. 126 i.] should be dropped because it is an inappropriate blanket prohibition that will not be the right thing to do in all situations. Decisions regarding removal of a tree are a site-specific decison that should be left to experts on ground. (5788.59)

Sample Statement:
Recommend this item [FNF P. 126 i.] should be dropped because it is an inappropriate blanket prohibition that will not be the right thing to do in all situations. Decisions regarding removal of a tree is a site-specific decision that should be left to experts on ground. Approved 6 -2 (4979.40)

PC # 69
Public Concern: The FNF should change the language in two aquatic guidelines that mention "stream diversions". One relates to culvert plugging or failure, while another relates to diversion for consumptive use. Thesee tow types of "diversions" are confusing.

Sample Statement:
On P: 126, Guidelines (e) and (l) are in direct conflict. The first says, "Prevent diversion of streamflows out of the channels", while the second says, "New stream diversions and associated ditches should be screened?" After a century of roading and logging misadventures along and across stream channels, the Service should have learned not to divert any more streams. (4938.30)

PC # 70
Public Concern: The FNF should clearly define "roads in long term storage".

Sample Statement:
Long-term storage needs to be defined. Culvert removal needs to be expressly mentioned as a tool for roads that will be "stored" for longer than a prescribed period. (4980.59)

PC # 71
Public Concern: The FNF should incorporate TMDL targets into the LMP

Sample Statement:
The Flathead National Forest has within its boundaries several water quality limited stream segment watersheds. These streams and rivers are listed by the Montana DEQ under the Clean Water Act in a process which occurred since the last forest plan. The forest planning process offers an excellent opportunity to incorporate standards that can fulfill the total maximum daily load contribution of the USFS in these streams. We would like to see such standards included in the next plan. (4989.105)

PC # 72
Public Concern: The BNF should provide direction to protect municipal water sources in Burnt Creek and Sheafman Mill Creek.

Sample Statement:
In Chapter 3 Design Criteria: A-Closed and A-1 classified watersheds on the Bitterroot NF (Burnt Fork Bitterroot River, and Sheafman-Mill Creek) warrant a high level of water quality protection. Activities within A-closed and A-1 watersheds that serve as public water supplies should be coordinated with local governments and MT DEQ to ensure that activities in these watersheds are consistent with local government and state requirements. (4735.14)

PC # 73

Public Concern: The BNF should acknowledge existence of private water releases in the Saphire GA.

Sample Statement:

The Sapphire Geographic Area will need be modified o describe the existence of these assets in or near the Bitterroot National forest and the effect on stream flows caused by the release of private waters. The geographic area is not in its natural state. (4976.1)

PC # 75

Public Concern: The LNF should provide direction to protect municipal watersheds: Rattlesnake, Packer-Silver Creek, and Ashley Creek.

Sample Statement:

In Chapter 3 - Design Criteria: Municipal watersheds on the Lolo NF (Rattlesnake Watershed, Packer-Silver Creek Watershed, and Ashley Creek Watershed) warrant a high level of water quality protection. Activities within municipal watersheds should be coordinated with local governments and MT DEQ to ensure that activities in these watersheds are consistent with local government and state requirements. (4756.14)

PC # 76

Public Concern: The LNF should develop direction to address land use changes and increased recreational use on water quality (in the Seeley Lake geographic area).

Sample Statement:

The Community Council is also very concerned with water quality issues. While the Lolo plan does discuss water quality issues, it must address the potential for changes in water quality associated with potential changes in land uses within the Valley, changes in demands for road uses, and potential increases in recreational use of lakes and streams. (4929.2)