

Objection Issue Briefing Paper: Conservation Watershed Network, Bull Trout, and Downstream Water Uses

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DRAFT: For purposes of facilitating discussion for objection resolution process only.

Summary of objection issue

1. Conservation watershed network: Need additional clarity around the selection and management of conservation watersheds.
2. Bull trout: Revised forest plan does not provide the ecological conditions necessary to contribute to the recovery of bull trout and its designated critical habitat. The environmental impact statement and biological assessment do not adequately disclose all potential effects. Changes to the Inland Native Fish Strategy standards will weaken protections for aquatic resources, and the analysis does not adequately address the effects of these changes.
3. Downstream water uses: The revised forest plan should adopt a more proactive fire management strategy to mitigate potential effects of wildfire on down-stream water users. Quote: "The proposed H-L&C National Forest Land Management Plan does not provide such assurances because it fails to account for the unique social and economic needs of the downstream affected communities; especially those with established senior water rights."

Background information

1. The designation of a conservation watershed network was a requirement in the planning rule/directives. Each forest is required to designate one or more conservation watershed networks. The Revised Plan includes the conservation watershed networks, which include the watersheds with threatened, endangered, and sensitive species, 303d listing and/or municipal watersheds.
 2. Bull trout: 20 years of Pacific Anadromous and Inland Native Fish Strategies, Biological Opinion monitoring data have shown that efforts within the Inland Native Fish Strategy boundary have improved habitat conditions. The Revised Forest Plan applies similar riparian zones across the entire Forest. The change referenced between the Inland Native Fish Strategy and the 2020 Forest Plan is the addition of an inner and outer riparian zone, with the overall width similar to the Inland Native Fish Strategy. None of the riparian management zones are suitable for harvest, but timber management could be used as a tool to improve riparian conditions.
 3. Downstream water uses: Several water conservation districts have been engaged throughout the revision effort regarding their concerns about water quality and quantity effects of fire and forest management.
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Summary examples of proposed resolution(s) submitted by objectors

1. Conservation watershed network: None
2. Bull trout: Requests to reconsult and supplement the environmental impact statement.
3. Downstream water uses: More emphasis on fire suppression strategies and fuel reduction efforts to limit catastrophic wildfires.

Objectors/Interested Persons

Name	Organization	Obj/Interested Person
James Bradley		Interested Person
John Chase	Sun River Watershed Group Cascade Conservation District	Objector
Al Christophersen	Elkhorn Restoration Committee	Objector
Joe Cohenour	Ten Mile/South Helena Forest Collaborative	Objector
Cory Davis	Southwest Crown Collaborative	Interested person
Randy Gray		Objector
EA (Andy) Johnson		Objector
Erling Juel	Greenfields Irrigation District	Objector
Rick Kerr		Interested Person
Jocelyn Leroux (with Adam Rissien and Michael Garrity)	Western Watersheds Project (with WildEarth Guardians and Alliance for the Wild Rockies)	Objector and Interested Person
Sara Lundstrum	National Parks Conservation Assn.	Interested person
David Mari		Interested person
Peter Nelson	Defenders of Wildlife	Objector
Harvey Nyberg		Objector
Deny Palmer		Interested Person
Ross Salmon	Teton Conservation District	Objector
Lee Signalness	Fort Shaw Irrigation District	Objector
Eric Sivers		Interested Person
Jason Todhunter	Montana Logging Association	Objector
John Tubbs	Montana Department of Natural Resources and Conservation	Interested Person
Len Walch		Objector

