



May 14, 2015

Flathead National
Forest Supervisor's Office
Attn: Joe Krueger, Forest Planner
650 Wolfpack Way
Kalispell, Montana 59901

Submitted via email to: flatheadplanrevision@fs.fed.us

RE: Scoping Comments for the Flathead National Forest Plan Revision

Dear Mr. Krueger,

Pursuant to the notice of intent to prepare a revised land management plan for the Flathead National Forest, Montana Trout Unlimited (MTU) and Trout Unlimited (TU) (collectively referred to in this letter as "TU") respectfully submit the following comments for consideration.

TU represents 150,000 members across the country. MTU represents the organization's 3,900 members 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 Flathead National Forest, as well as waters located downstream from the forest. Additionally, the Flathead Valley Chapter of Trout Unlimited is an active participant in regional land and fisheries management issues, including the Whitefish Range Partnership.

General Comments

TU's interest in the Flathead National Forest's plan revision lies primarily with the conservation and restoration of native westslope cutthroat trout and bull trout and their habitats. We feel that the proposed action provides management direction that will benefit these species and we appreciate the Forest's commitment to bull trout and cutthroat trout conservation.

Westslope cutthroat trout are a Species of Concern for the state of Montana and the Forest Service is a partner in the *Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana, 2007* (Conservation Agreement) which list, among the objectives, maintaining, securing, and enhancing conservation populations, and seeking opportunities to restore and expand populations.

Bull trout are also a State Species of Concern, as well as federally listed as Threatened under the Endangered Species Act. State management is governed by the *State of Montana Bull Trout Restoration Plan, 2000* and, as a federally listed species, the United States Fish and Wildlife Service has separate responsibility under the Endangered Species Act for development of a federal recovery plan and designation of critical habitat. A revised draft plan is expected to be finalized in September 2015. Additionally, the Forest Service has developed *The Bull Trout Conservation Strategy for Forest Service Lands in Western Montana, 2013*, a strategy to guide and prioritize conservation activities for bull trout on National Forest lands.

Competition and predation from non-native salmonids, as well as interbreeding with some introduced species, are the primary threats to native trout in the region. The Forest Plan assessment correctly notes that changes in species composition of Flathead Lake is perhaps the single factor most responsible for the decline of the Flathead Lake bull trout. However, protecting habitat for existing populations and expanding populations into suitable habitat are central themes in recovery plans for both bull trout and westslope cutthroat trout. Protecting clean, cold, complex and connected habitat is critically important. Moreover, as fisheries managers actively work to address the threats posed by non-native fish, maintaining high-quality aquatic habitat on the forest is and will continue to be essential for the conservation and recovery of at-risk native trout on the Flathead National Forest.

Specific Comments on the Proposed Action

Forestwide Direction for Watersheds:

TU agrees with the desired conditions, but recommends some changes to the objectives, standards and guidelines.

- The objective may be best stated as “improve at least four watersheds” instead of stating “three or four”, thereby creating a specific baseline objective that corresponds with the number of Class 2 Watershed Condition Framework watersheds that have been identified as high priorities.
- TU recommends that Guideline 03 be restated as a standard, thereby requiring the use of project-specific BMPs. BMPs should be mandatory component of all project plans to ensure impacts are appropriately mitigated.
- Likewise, Guideline 04 should be restated as a standard. Where the Forest Service has authority over stream diversions and associated ditches, fish screens should be mandatory.

Forestwide Direction for Riparian Habitat Conservation Areas (RHCA):

TU appreciates that the Forest intends to incorporate standards and guidelines into the proposed action that are equivalent to the INFISH riparian protection strategy. We recommend, however, that instead of replacing INFISH’s measurable Riparian Management Objectives with subjective, blanket standards for achieving desired conditions in RHCAs (e.g., “minimizing sediment inputs...maintaining instream flows...providing stream shading...etc.”), that the Forest instead require that measurable

resource standards be met for stream reaches potentially affected by activities, and to make these standards site-specific and comparable to those found in undisturbed reference reaches. This could include a measurable description of woody debris size and distribution, embedded sediment, background water temperature, shading, etc. This avoids standardizing measurable objectives across the forest, irrespective of local geological and vegetative conditions, while also ensuring an objective of replicating natural background conditions. We believe the proposed action's standards and guidelines will help achieve the measurable standards, with the following modifications:

- Guideline 01 should be rewritten as a standard, not a guideline. As noted in *Appendix B: Potential Management Approaches*, RHCAs are a primary mechanism of the coarse filter in the Proposed Action's two-tiered approach for managing aquatic ecosystems. As such, the RHCA widths should be mandatory, with deviations only permitted with documented justification, as detailed in the following bullet.
- Any deviation from default RHCA widths should, as recommended, require documentation of the rationale for the modification. However, the rationale should not be subjective and it should include scientifically based evidence demonstrating the deviation can occur without creating additional risk.
- We recommend a standard requiring that scientifically based evidence should be part of any decision to allow fire in the RHCAs.
- The forest should develop a clear standard on how fire suppression efforts will occur so that retardant use does not threaten water quality within an RHCA.
- Guideline 06 should be rewritten as a standard that will prohibit instead of simply "avoid" the storage of fuels and other toxicants within an RHCA.

We also strongly recommend that the default RHCA width for Category 2 streams that are hydrologically connected to fish-bearing streams be the same as Category 1 streams. The reason for this deviation from the width prescribed for Category 2 streams in INFISH is that these channels can potentially deliver significant amounts of sediment to connected fish-bearing reaches. These channels can also affect thermal conditions in the fish bearing reaches. Therefore the sediment filtering and shade benefits of wider RHCAs in Category 2 streams can benefit fish in connected reaches. A fish bearing stream is only as healthy as its entire watershed and we believe that this approach is more consistent with the watershed context of the Proposed Action.

By incorporating the above recommended changes, TU believes the Plan will be strengthened and the establishment of consistent and attainable management objectives within RHCAs will ensure healthy streams, riparian areas, and watershed conditions.

Forestwide Direction for Aquatic Habitat:

- In most cases, Desired Condition 02 ("connectivity between water bodies provides for life history functions") is very much appropriate. However, there are instances where native fish populations need to be protected from invasions of

non-native species and artificial barriers can prove to be valuable fisheries management tool. For this reason, we recommend adding a caveat that connectivity is desirable except in situations that require the separation of native and non-native aquatic species.

- TU agrees that there should be numerical objectives for habitat reconnection and restoration. However, we recommend that this objective correspond with identified problem areas. For instance, *The Bull Trout Conservation Strategy for Forest Service (FS) lands in Western Montana* identifies streams on the Forest with an “active restoration” strategy and it would be beneficial if the objective for miles of restored/enhanced streams was tied to these identified stream reaches.
- Lastly, TU recommends that the Forest consider the benefits of habitat reconnection and restoration in the context of all limiting factors, especially competition with non-native species such as lake trout. TU feels that this will be useful to ensure that limited resources are directed to projects – including the suppression of non-native species – that are most likely to result in measurable progress toward the recovery of at risk species.

Forestwide Direction for Aquatic Species:

TU strongly recommends bolstering forest-wide direction for aquatic species, including standards and more robust guidelines to ensure that the desired conditions and objectives are met.

- While bull trout recovery plans are well represented in the objectives, westslope cutthroat trout are not. As noted in our general comments, the Forest Service is one of many partners who are party to the Conservation Agreement, which includes specific goals and objectives for conserving and recovering westslope cutthroat trout. We recommend that these goals and objectives be included in forest-wide direction for aquatic species.
- Unlike other areas within the historic range of westslope cutthroat trout, the Flathead National Forest is a stronghold for this species. While certain plan components place an emphasis on the protection of critical habitat for bull trout, habitat for core conservation populations of cutthroat trout (i.e. >99% genetic purity; see Conservation Agreement) are not provided a similar, higher level of protection. The Conservation Agreement places special emphasis on protecting genetically pure populations of westslope cutthroat trout. We recommend two additions to the forest-wide direction for aquatic species: 1) continue surveying waters to identify genetically pure populations, and 2) develop specific plan components to ensure protection for these core conservation populations of westslope cutthroat trout and their habitats.
- TU feels that efforts to conserve and restore native trout would benefit from forest-wide direction for awareness, prevention and control of aquatic invasive species. This could be captured in the forest-wide desired conditions for aquatic species with a statement to the effect that forest users are aware of the threat posed by aquatic invasive species (including non-native fish), as well as

precautions that individuals can and should take to prevent the introduction and spread of aquatic invasive species.

Achieving this desired condition would benefit from guidelines; suggestions include:

- Educational informational programs and materials should address aquatic invasive species.
- Signage at trailheads, boat ramps, and other water-based recreation access sites should include information on aquatic invasive species, including preventive measures.
- As applicable, staff conducting visitor contacts should receive aquatic invasive species trainings.

We also recommend continued partnerships with the Flathead Basin Commission, Montana Fish, Wildlife, and Parks (MFWP) and other partners who work to prevent the spread of aquatic invasive species. Lastly, TU greatly appreciates the focus and resources that the Flathead National Forest has put into the issue of invasive species, including efforts to suppress lake trout in Swan Lake.

Addressing the threat of invasive species – both on and off forest – is essential in order to fully realize the benefit on healthy habitat *on* the forest.

Forestwide Direction for Renewable and Non-renewable Mineral Resources:

The final directives for the 2012 Planning Rule provide the opportunity for national forests to include oil and gas leasing decisions as part of a revised plan; this is a reversal from the draft directives. While the forest-wide direction for renewable and non-renewable mineral resources states that an oil and gas leasing decision will not be part of the proposed action, the proposed action was largely developed under the draft directives. Given the change between the draft and final planning directives, the draft alternatives should confirm that a leasing decision will not be included in the plan revision.

- TU encourages the Forest to include a standard stating that no oil and gas leasing will occur until a new leasing decision is made. This will prevent confusion with Desired Condition 05, which states “energy leasable minerals are available for lease where the land is open to leasing”, a statement that could be interpreted to infer that lands are currently open to leasing. In other words, we recommend that no lands should open to leasing unless a new leasing decision is made subsequent to the plan revision.
- As noted in the forest-wide direction, there are hundreds of suspended leases on the Forest. While we understand that no activity can take place on the suspended leases unless an EIS is completed, it may be valuable for the desired conditions to state whether or not the Forest intends to maintain the lease suspensions in perpetuity. TU feels that it is desirable to establish a clean slate and cancel leases,

whether voluntarily as many lease holders have done in the North Fork, or through administrative action¹.

Management Areas:

The areas identified as Management Area 1b Recommended Wilderness and 2b Eligible Wild and Scenic River contain important coldwater fisheries and high quality recreational angling experiences. Accordingly, TU supports these protective land management strategies in the proposed plan. However, we do recommend adjustments to the Tuchuck-Whale area, as noted below. Lastly, we recommend that the environmental analysis and draft alternative consider, and if appropriate include, additional areas with wilderness characteristics that may be suitable for inclusion as Recommended Wilderness.

North Fork Flathead Geographic Area:

Trout Unlimited has been an active participant in the Whitefish Range Partnership and we are proud that this group of stakeholders has been able to come to consensus over the management of this important landscape. We fully endorse the recommendations of the Whitefish Range Partnership and many of the agreement components are beneficial for coldwater fisheries. In particular, the proposed Tuchuck-Whale Recommended Wilderness Area will help protect critical habitat for bull trout as well as conservation populations of westslope cutthroat trout. However, as detailed in comments submitted on behalf of the Whitefish Range Partnership, one adjustment is necessary in order for the proposed action to reflect the Partnership's agreement; this modification is to include as Recommended Wilderness the small amount of lands in the northwest portion of the geographic area.

Forest-wide Direction for Priority Watersheds:

The final directives implementing the 2012 Planning Rule require plans to identify watersheds that are a priority for restoration, referring to these watersheds as "priority watersheds". We support the systematic methods for identifying subwatersheds with the greatest need for restoration. However, we question the proposal to also include all bull trout critical habitat as Priority Watersheds. Doing so could conflate land management strategies for restoring streams with protection strategies for high-quality refugia habitat, potentially resulting in conflicting management direction. For this reason, we feel that it would be valuable to separate these classifications of subwatersheds into two categories: 1) priority restoration watersheds for streams where habitat restoration is the management priority, and 2) priority protection watersheds for preservation of both bull trout critical habitat and core conservation populations of westslope cutthroat trout.

This recommendation is similar to the strategy employed in the Beaverhead-Deerlodge National Forest's revised Forest Plan (2009)². In this instance, the Beaverhead-Deerlodge identified fifty-six "fish key watersheds" and fifteen "restoration key watersheds", while also developing goals, objectives and standards specific to each respective key watershed category. TU feels that a similar approach would be beneficial on the Flathead National Forest.

¹ 43 C.F.R. § 3108.3(d) provides that "Leases shall be subject to cancellation if improperly issued."

² See Appendix H: http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5052781.pdf

Additionally, forestwide direction, e.g. desired conditions, standards and guidelines, should be detailed for each classification. Alternately, the forest might consider developing a Management Area class for both priority restoration and priority protection watersheds that includes a distinct set of plan components that ensure preservation of fish habitat is the driving management priority. Establishing these sub-watersheds as their own Management Areas that are distinct from the other proposed Management Areas would prevent conflicting land management direction in cases where bull trout critical habitat or core cutthroat trout populations overlap with Management Areas that have less conservation focus, such as MA 6: General Forest Management Areas.

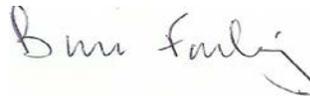
Summary

In conclusion, thank you for the consideration of our suggestions and input. If you have any questions, please do not hesitate to contact us. We hope that the planning team finds our comments helpful and we look forward to working with the Flathead National Forest throughout the remainder of the plan revision process.

Sincerely,



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