

# Montana Chapter of the American Fisheries Society

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August 12, 2005

Lesley W. Thompson  
Lewis and Clark National Forest  
1101 15<sup>th</sup> Street North  
Great Falls, MT 59401

Dear Mr. Thompson:

This letter provides comments from the Montana Chapter of the American Fisheries Society (MCAFS) on the Lewis and Clark National Forest's draft environmental impact statement (DEIS) addressing the Rocky Mountain Ranger District Travel Management Plan. The MCAFS is an organization of over 300 professional fisheries scientists from state and federal agencies, tribal governments, universities and the private sector across Montana. Because one of our chapter's principal objectives is the conservation, management and wise utilization of fisheries resources within Montana, we are very interested in commenting on this DEIS.

The MCAFS strongly supports Alternative 3 in the DEIS as offering the best long-term protection to the fish and wildlife resources on the Rocky Mountain Ranger District (RMRD). This alternative is the most restrictive in permitting OHV use, which is necessary to maintain and enhance the high-quality fishery values on the Rocky Mountain Front, especially in the Badger and Two Medicine drainages.

The Badger-Two Medicine area contains the last remaining stronghold of genetically pure westslope cutthroat trout (WCT) on the Rocky Mountain Front. OHV use in this area (particularly Whiterock Creek trail #102) has resulted in significant habitat degradation in some areas. Although the effects of the habitat degradation are not entirely known (due to insufficient data), population-level impacts have likely resulted from these actions. Protecting and enhancing these populations and their habitats is critical to maintaining the viability of WCT in northcentral Montana and should be a top priority of the RMRD. Alternative 3 provides the best protection to these populations.

The DEIS provides little and incomplete discussion on the travel alternatives relative to WCT distribution, as evidenced by the lack of maps denoting locations of populations on the RMRD. This is disconcerting considering the WCT is a Montana Species of Special Concern, a U.S. Forest Service Sensitive Species, and has been petitioned for protection under the federal Endangered Species Act. Furthermore, the cumulative effects analysis

for WCT in the DEIS is inadequate in addressing known livestock grazing concerns and OHV use in the Badger-Two Medicine drainages. As evidenced in the Whiterock drainage, these two activities have resulted in an impaired riparian corridor, damaged streambanks, and increased sediment loading into the stream. The DEIS simply states that cumulative effects from existing travel management (as proposed in Alternatives 1, 2, and 4) “may exacerbate sedimentation problems but are not generally believed to change the significance level of current or future impacts from road or trail use”. We strongly advise that the Badger-Two Medicine WCT populations warrant better protection and that further analysis is needed to fully evaluate cumulative effects under the various travel alternative proposals.

Lastly, the DEIS acknowledges funding levels for trail maintenance on the RMRD will remain static or decline in the immediate future and current budgets are inadequate to complete needed maintenance. A change in current travel management policy (such as Alternative 3) will help the RMRD better manage the renowned fish and wildlife resources of the Rocky Mountain Front. We strongly encourage you to implement Alternative 3 to protect these important public resources.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Clint Muhlfeld". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Clint Muhlfeld, President  
Montana Chapter of the American Fisheries Society