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Mr. Robert Lale, PP and A Engineer  
FHWA Western Federal Highways Division  
610 East Fifth Street  
Vancouver, WA 98661-3893

Sandy Straehl, Administrator  
Intermodal Transportation Planning  
Montana Department of Transportation  
2701 Prospect Avenue  
Helena, MT 59620

Tom Pettigrew, Director of Engineering  
Forest Service, Region 1  
P.O. Box 7669  
Missoula, MT 58907

Re: Forest Highways Program Projects on Thompson River, Petty Creek and Little St.  
Joe Creek

Dear Mr. Lale, Mr. Pettigrew and Ms. Straehl:

I am writing on behalf of the Montana Chapter of the American Fisheries Society to provide comment and express our concerns regarding projects proposed on the Lolo National Forest to improve roads under the auspices of the Forest Highways Program in the Thompson River, Petty Creek and Little St. Joe drainages. The American Fisheries Society (AFS) is the oldest and largest professional society representing fisheries scientists. The mission of the AFS is to improve the conservation and sustainability of fishery resources and aquatic ecosystems by advancing fisheries and aquatic science and promoting the development of fisheries professionals. The Montana Chapter is comprised of approximately 260 fisheries professionals representing state and federal agencies, tribal governments, universities, and the private sector.

As fishery professionals, we are concerned that the environmental review process for these projects will not adequately involve biologists familiar with the streams in question. We do not believe the purpose and need of these projects has been adequately demonstrated and we feel quantitative information to support the contention that the fishery benefits of the projects outweigh the potential ecological impacts is lacking. We are also concerned that the proposed schedule will contribute to inadequate environmental review. The review and decision-making process is on an accelerated pace that skirts the Forest Service line-officers who are responsible for conserving and managing National Forest resources.

We are especially concerned these projects could proceed without ample regard for each watershed's fisheries values. The Thompson River is home to several important salmonid species, including bull trout, a threatened species under the Endangered Species Act, and westslope cutthroat trout, a Species of Special Concern in Montana. In addition, the Little St. Joe drainage is the most important bull trout core area remaining in this portion of the lower Clark Fork River watershed. The Petty Creek drainage is home to a robust population of westslope cutthroat trout and is also a bull trout core area.

We believe that the proposed activities may potentially degrade critical bull trout habitat and negatively impact core populations, which are important for recovery and conservation efforts. Specifically, road improvement mitigation plans should include measures that will upgrade culverts to provide fish passage to spawning and rearing habitats and improve drainage features to restore normative runoff and sediment regimes in the drainages. We recommend, however, that the genetic integrity of westslope cutthroat trout populations be quantified and considered on a case-by-case basis when evaluating culvert replacement projects. Further, in areas where bank stabilization is deemed necessary, natural bank revetment structures (i.e., large woody debris, j-hook veins) should be used rather than riprap to maintain the natural integrity of critical shoreline habitats. Natural shoreline areas are critical for subadult bull trout as they provide nighttime feeding and resting areas.

We do not question the need for road maintenance on county, state, private and Forest Service roads that run through national forests. However, the scientific evidence is clear that the prime road-related impacts on water quality and fish populations on national forests in western Montana are from system and non-system roads constructed primarily for logging. These impacts include increased sediment from poor road drainage, culverts undersized for the discharges they must convey, poorly engineered culverts that interrupt fish movement, cut-slopes that impede the exchange of groundwater with surface flows, roads serving as beachheads for weed infestations, and other impacts. Maintenance and retirement of substandard roads should be the number one priority for investment on roads in national forests.

Based on the limited information and public discussion on these projects thus far, it appears there could be significant impacts to at-risk fisheries. These impacts range from increased traffic that increases risk of spills from accidents on the Thompson River road, to riprapping that reduces salmonid habitat and stream function on the Little St. Joe Road. Improved road access will also encourage additional angling pressure on sensitive fisheries, particularly in Little Joe Creek. In addition, we believe it is important to evaluate the effects these projects will have on facilitating development of private land on national forest margins. It would help to conduct this evaluation in the context of how private land development will directly affect fish and wildlife, as well as how it might increase the Forest Service's increasing obligation to invest in fire suppression in interface areas. We note that the impacts of Forest Service fire suppression on fisheries in interface areas is currently an issue of concern. In fact, the State of Montana and the Forest Service are currently discussing problems associated to the impacts of suppression activities on cutthroat trout habitat in O'Brien Creek, located outside of Missoula and not far from Petty Creek.

We urge your agencies to invite increased participation by agency fishery biologists and hydrologists in the evaluation of the impacts of these projects. We also recommend you invite wider public participation in the decision, so that the public can better understand the need, purpose, and tradeoffs of these projects while there is still time to modify or eliminate them as Forest Highway Projects.

We would appreciate being apprised in a timely fashion as these projects wend their way through environmental analysis and potential design phases.

Sincerely,

Steve Leathe  
President

cc. Debbie Austin, Supervisor, Lolo National Forest  
Kathy McCallister, Region I, Deputy Regional Forester  
Chris Hunter, Fisheries Division Administrator, Montana FWP  
Mark Wilson, Director, Helena Office, Ecological Field Services, USFWS  
John Wardell, Director, Helena Office, USEPA

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