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29 April 2010

Leslie Weldon
Regional Forester
Region 1, USDA Forest Service
Federal Building
Box 7669
Missoula, MT 59807

Re: Forest Landscape Restoration Program: Southwestern Crown of the Continent

Dear Regional Forester Weldon,

Montana Trout Unlimited supports the Southwestern Crown of the Continent Collaborative's proposal to the Forest Service for support under the Forest Landscape Restoration Program. Montana TU represents more than 3,200 conservation-minded anglers, including approximately 1,200 who live in or around the region affected by this proposal. Montana TU and TU national helped craft and were strong supporters of the legislation creating the new forest restoration initiative

We endorse the general priorities and objectives of the proposal, which seeks to reduce fire risk near communities, protect and restore water quality and restore important fish and wildlife habitat. We also appreciate that the proposal seeks to engage the public in a more involved partnership with the Forest Service in developing the discrete projects that could spin from this Southwestern Crown initiative. Many of the elements of Southwestern Crown proposal mimic efforts TU has been involved in or proposed for national forests in Montana and elsewhere.

We have a special interest in the program's potential for landscape-scale watershed restoration. Among our priorities, which are embodied in the proposal, is reduction of unnecessary, redundant and environmentally harmful portions of the national forest transportation system. Poorly located roads, high-density road systems, poor road drainage and faulty stream crossings deliver sediment to streams, impair groundwater movement and block movement of fish and other aquatic species. They also continue to hamper the Forest Service's ability to provide clean water and healthy fish and wildlife populations. Montana TU continues to believe impacts from the Forest Service's road system should be a primary goal of land management, and addressing this priority is embodied in the Southwest Crown proposal.

Though we endorse this proposals' ideas for reducing fuels in certain areas to help restore a semblance of natural fire intensity and recurrence intervals, we urge the agency in its approach to

implementing Forest Landscape Restoration Projects to do so only after evaluating how fire can compound problems in at-risk watersheds within heavily managed landscapes. The goal to reduce fuels to better accommodate low severity or mixed severity natural fire regimes is laudable, but it is best accomplished on landscapes when watershed function is healthy. The beneficial role of fire in forest ecosystems of this region is significant. However, the result of fire on landscapes with watersheds that are functioning at risk because of high densities of roads, grazing or other activities doesn't often produce "natural" results. In some cases in developed watersheds it produces mass wasting events, erosion that exceeds natural rates and severe stream channel damage.

Given the Forest Service's priority on producing clean water from national forests, and considering the shifting climate this region is experiencing, we are convinced that vegetative management for reducing fire risk, or for re-creating fire severity that ecologists determine is more aligned with what could be expected within the range of natural variability, should occur only after careful consideration is given to how to maintain or improve watershed function. We believe this consideration should be key to projects spinning from the proposed Southwestern Crown Project. Too often "restoration" on national forests focuses on vegetative management and how fire can be reintroduced as a healthy agent of change. And that's fine. However, vegetative management and fire management should first and foremost spin from objectives that protect and improve watershed health.

Again, we endorse this proposal and encourage the Forest Service to make it a high priority for the Forest Landscape Restoration Program.

Sincerely,

Bruce Farling
Executive Director

cc. Chief Tom Tidwell
William Timco, WO