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Comments:

Dear Ms. Erickson:

The City of Bozeman hereby submits its official comments for the draft Forest Plan of the Custer Gallatin National Forest. The comments are provided in the attached PDF file. The Bozeman City Commission endorsed these comments via adoption of Commission Resolution No. 5034, passed on June 3, 2019. The comment letter is included with the Resolution as Exhibit A.

Sincerely,

Brian Heaston, PE

Senior Engineer

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF BOZEMAN, MONTANA, SUBMITTING COMMENTS ON THE CUSTER GALLATIN NATIONAL FOREST DRAFT FOREST PLAN.

WHEREAS, The Custer Gallatin National Forest has released the Custer Gallatin National Forest Draft Forest Plan for public review and comment with a comment deadline of June 6, 2019;

WHEREAS, one-hundred percent of City of Bozeman drinking water supplies originate on lands managed by the Custer Gallatin National Forest;

WHEREAS, the City of Bozeman owns roughly 4,000 acres of land in checkerboard with the Custer Gallatin National Forest within the Sourdough Creek Municipal Watershed;

WHEREAS, the City of Bozeman and Custer Gallatin National Forest enjoy a positive working relationship founded on principles of shared stewardship to cooperatively maintain, in the long-term, a high quality, predictable water supply for the City;

WHEREAS, the City of Bozeman and Custer Gallatin National Forest have entered into a Memorandum of Understanding expressing and memorializing its cooperative intent, in the spirit of shared stewardship, to cooperatively maintain, in the long term, a high quality, predictable water supply for the City;

WHEREAS, the existing Forest Plan for the Gallatin side of the Custer Gallatin National Forest was completed in 1987;

WHEREAS, forest plans generally set forth a 20-year planning horizon, thus opportunity for public review and comment of forest plans occurs infrequently;

WHEREAS, the Custer Gallatin National Forest Draft Forest Plan sets forth various management area designations with related desired conditions, goals, objectives, standards and guidelines;

WHEREAS, upon review of the Custer Gallatin National Forest Draft Forest Plan, City Staff have identified three issues deserving attention for comments prior to rendering a final plan decision: 1) Compatibility of the draft forest plan with relevant plans of other public agencies; 2) land use restrictions within Key Linkage Area designations; 3) Recreational Emphasis Areas within City of Bozeman municipal watersheds;

WHEREAS, the official comment letter to the Custer Gallatin National Forest has been prepared addressing the three issues identified above and is attached to this Commission Resolution 5034 as Exhibit A, and by this reference is made a part hereof;

NOW, THEREFORE, BE IT RESOLVED by the City Commission of the City of Bozeman, Montana, that the comment letter attached as Exhibit A to this Commission Resolution 5034 is officially endorsed by the City Commission and that the City Commission hereby releases City Staff to submit same to the Custer Gallatin National Forest as its official comments to the Custer Gallatin National Forest Draft Forest Plan.

PASSED, ADOPTED, AND APPROVED by the City Commission of the City of Bozeman, Montana, at a regular session thereof held on the 3rd day of June, 2019

Dear Ms. Erickson:

The City of Bozeman is writing to provide the Custer Gallatin National Forest (CGNF) its official comments on the Draft CGNF Forest Plan. We respectfully bring three issues to your attention: 1) Compatibility of the draft forest plan with relevant plans of other public agencies; 2) land use restrictions within Key Linkage Area designations; 3) Recreational Emphasis Areas within City of Bozeman Municipal Watersheds.

The City of Bozeman and CGNF enjoy a long-standing positive and collaborative working relationship based on principles of shared stewardship of critical municipal watershed lands at the northern end of the Gallatin Range largely managed by CGNF. The CGNF also manages land within the Lyman Creek municipal watershed at the southern end of the Bridger Range. The criticality of these municipal watersheds cannot be understated as they sustain the quality of life not only enjoyed, but expected, by residents and visitors of the City of Bozeman and the Greater Yellowstone Ecosystem.

As the CGNF is aware, the City of Bozeman owns and manages, under principles of shared stewardship, roughly 4,000 acres of land in checkerboard with the CGNF within the Sourdough Municipal Watershed. The City and CGNF have long worked together in good faith to cooperatively maintain, in the long term, a high quality, predictable water supply for the City through cooperative efforts in implementing sustainable land management practices. This cooperative intent is memorialized in a Memorandum of Understanding between the CGNF and City of Bozeman dated March 27, 2017 (USFS Agreement No. 17-MU-11011100-036, attached to this letter and hereby made a part of these comments). We respectfully ask that the final CGNF Forest Plan duly consider the spirit and content of this MOU and that final plan designations be consistent and complement the same.

1. Compatibility of the Draft Forest Plan with Relevant Plans of Other Public Agencies

The City of Bozeman is a public agency that owns land within the Sourdough Municipal Watershed wholly surrounded by the CGNF and has invested substantial time and monetary resources to proactively plan for its future water supply needs. The City of Bozeman has long planned to develop additional water supplies in the Sourdough

Municipal Watershed. Mystic Lake Dam, situated on CGNF lands near the headwaters of Sourdough Creek, was breached in 1984 due to safety concerns. Mystic Lake was a source of municipal water supply for the City of Bozeman prior to the breach of the dam.

Since the Mystic breach, the City has conducted multiple planning studies to replace the lost water storage in a geologically suitable location to protect the City's interests in its Mystic Lake water rights. The City also holds a water reservation to store water in the Sourdough municipal watershed as well as interests in Mystic Lake water rights. The most recent of these planning studies is the Integrated Water Resources Plan (IWRP)¹. The IWRP identifies the City's projected water supply needs over a 50-year period by comparing the reliable yield of existing water supplies to the projected 50-year water demand. It then identifies water supply alternatives to fill the projected supply gap.

A technical advisory committee (TAC) consisting of a diverse stakeholder group was convened to help review technical information and shape plan recommendations. The USFS was a member of the TAC convened for the IWRP through the membership and participation of Frank Cifala, USFS Lands and Uses Specialist. The IWRP was adopted by the City Commission in 2013 and is an integral and relevant plan shaping the future of the City of Bozeman. The adopted IWRP contains a recommended supply alternative for 'Sourdough Impoundment(s)' at a volume of 915 acre-feet.

Consideration of compatibility with other relevant adopted plans of the City of Bozeman must be given. The adopted Bozeman Community Plan² is the overarching planning document for the City of Bozeman. It contains germane references to City of Bozeman water supply planning efforts in Sourdough municipal watershed at Appendix H, page H-

3. The City's 2017 Water Facility Plan Update³ which replaces the 2005 Water Facility Plan, is also relevant as it sets forth the master plan for the City's water supply and distribution system. Chapter 10 of the 2017 Water Facility Plan Update contains tables listing short-term, near-term and long-term capital improvements projects necessary to

1 <https://www.bozeman.net/bome/showdocument?id=836>

2 <https://www.bozeman.net/Home/ShowDocument?id=1074>

3 <https://www.bozeman.net/home/showdocument?id=4977>

ensure continued safe and dependable drinking water supplies for the City. Multiple projects are identified to occur within Sourdough and Hyalite municipal watersheds. Lastly, the City of Bozeman has prepared a Forest Management Plan 4 for its timbered landholdings within the Sourdough municipal watershed. This plan identifies fuels and timber stand treatments to reduce the risk of catastrophic wildfire in the watershed. The plan complements the proposed Bozeman Municipal Watershed fuels reduction project on CGNF lands within Sourdough and Hyalite watersheds.

The City respectfully requests that 'Appendix E - Compatibility of the Revised Forest Plan with Relevant Plans of Other Public Agencies' as contained in the Draft Environmental Impact Statement (EIS) document be amended to consider and include the above relevant plans of the City of Bozeman to develop future water supplies and maintain forest health in municipal watersheds.

1. Land Use Restrictions within Key Linkage Area Designations

Key Linkage Areas (KLA) are designated in Alternatives B, C, and D for both the Bridger, Bangtail and Crazy Mountains Geographic Area and the Madison, Henrys Lake and Gallatin Mountains Geographic Area. Draft CGNF Forest Plan Guideline FW-GLD-WL-02 places significant limitations and barriers to the construction of new permanent facilities or structures within these key linkage areas. The gross application of KLA restrictions for new permanent facilities or structures must be revisited to consider the compatibility of this proposed forest plan element with relevant plans of other public agencies (Comment 1 above).

Due to the significant implications that the Gallatin KLA presents upon the City's long[shy] standing plans to develop water supply in Sourdough municipal watershed, the draft Forest Plan restrictions on new permanent facilities and structures in the KLA must be reconsidered. These restrictions conflict with the spirit of the Memorandum of Understanding between CGNF and the City and prevent the City from implementing a significant element of its Integrated Water Resources Plan.

The City does not disagree in concept about the overarching importance of sustaining ecological conditions that provide landscape-scale linkages promoting dispersal and genetic interchange between otherwise disparate wildlife populations. We do, however, question the efficacy of a KLA designation given the significant barriers to

4 <https://www.bozeman.net/home/showdocument?id=9021>

connectivity already present within the CGNF (Highway 86, Highway 10, Interstate 90, BNSF Railway Mainline, growing population center).

The City desires certainty with respect to its ability to implement its Integrated Water Resources Plan by pursuing water projects in the Sourdough Municipal Watershed and proposed Gallatin KLA. As written in its draft, the KLA appears to negate 35 years of municipal water supply planning - planning that the CGNF has participated in - and significantly hampers the City's ability to serve a growing a population with a safe and

dependable municipal drinking water supply, which is contradictory to the spirit of the MOU between CGNF and City of Bozeman.

The CGNF is encouraged to review the 2017 Water Facility Plan Update as it is instructive as to the general approach the City is taking to implement water storage in Sourdough municipal watershed (see Table 10.4.2, Project IDs WFP_23 and WFP_51). The storage concept is to develop a series of low-head impoundments to gain the 915 acre-foot storage target in the Integrated Water Resources Plan by mimicking natural storage areas created by beavers. Montana State University, in partnership with the City of Bozeman, recently completed a feasibility-level analysis of beaver mimicry in Sourdough municipal watershed and has determined that the 915 acre-foot storage target can be achieved by constructing a series of low-head beaver dam analog structures. This 'naturalized storage' concept is inherently low impact, would fit naturally into the landscape, and enhances habitat diversity with minimal overall impact to the ecosystem.

Moreover, should the KLA remain in the final plan, we respectfully request the City of Bozeman be granted an exception to KLA limitations for new permanent facilities, structures, or active management programs (e.g. fuels treatments) benefitting the City of Bozeman that are water quality or water quantity related. The City seeks certainty with respect to its ability to implement its Integrated Water Resources Plan by developing low impact naturalized storage areas and water conveyance infrastructure in Sourdough municipal watershed.

3} Recreation Emphasis Areas within City of Bozeman Municipal Watersheds

The City of Bozeman respectfully requests that the CGNF manage and place priority watershed status designations in the final forest plan for Hyalite Creek ; Sourdough Creek, and Lyman Creek municipal watersheds. We ask that the final version of the forest plan contain language highlighting the priority status of these municipal watersheds and that the priority designation eclipse, yet complement, recreational

emphasis area management decisions. It is imperative that any project or programmatic decisions made by CGNF within the Recreational Emphasis Areas recognize the critical function these watersheds have as high quality drinking water supply sources for the City of Bozeman. In the spirit of shared stewardship, and following the expressed intent of the MOU between the CGNF and City of Bozeman, it is critical that any management decisions made in these municipal watersheds always err towards sustaining water quality and quantity to maintain, in the long-term, the City's drinking water supply.

MEMORANDUM OF UNDERSTANDING
Between The

CITY OF BOZEMAN, MONTANA

And The

USDA, FOREST SERVICE CUSTER GALLATIN NATIONAL FOREST