



Chas Cartwright, Superintendent, Glacier National Park
Attention: Rose Creek EA
P.O. Box 128
West Glacier, MT 59936.

January 17, 2012

Dear Mr. Cartwright:

The Flathead Audubon Society (FAS) is a local, active group of people interested in sound stewardship and management of natural resources. Many of our members are regular users of Glacier National Park.

We have reviewed the Environmental Assessment for the Rose Creek Fish Barrier Removal and Bridge Replacement and submit the following comments.

FAS supports the selection of the Preferred Alternative that would remove the weir and replace the bridge as described. This is a commendable project consistent with the NPS primary purpose of protecting resources. Removal of the weir, and to a lesser extent replacement of the bridge, will restore fish passage and improve stream ecology. In light of the uncertainty of climate change impacts, increasing ecosystem resiliency will be critical for maintaining the resources and values of the park. Restoring this stream to a more natural condition will provide for future changes, and is precisely the kind of project the park needs to implement to help fulfill its mission.

A few parts of the EA warrant comments. The new bridge is described as a "clear span" having no part of it in the stream channel yet it is stated that rip rap around the abutments may be needed. It is not clear why rip rap would be needed if the abutments are not in the stream channel.

In the section "Impact Topics Dismissed from Further Analysis," wildlife in general is discussed as having minor to negligible impacts and dismissed. Yet in the description of the Preferred Alternative a list of wildlife mitigation measures is given. This does not appear consistent with the earlier dismissal of wildlife concerns if mitigation measures are appropriate. Other subjects addressed in the EA also have minor to negligible impacts so there doesn't seem to be justification for excluding wildlife concerns from analysis.

Fish and sediment sampling before and after the project is sound management and FAS encourages a longer sampling period than the 5 years proposed in the EA.

Installation of bat boxes under the new bridge is a welcome addition to the project. It would be helpful if the EA addressed current bat use of the existing bridge, if any, and the design of the bat boxes to be installed.

In the Statement of Findings for Floodplains, the NPS reference needs corrected.

Thank you for considering our comments.

Paula Smith
President
Flathead Audubon Society