



June 3, 2019

Custer Gallatin National Forest  
Attn: Forest Plan Revision Team  
10 E. Babcock  
PO Box 130  
Bozeman, MT 59771

Dear Custer Gallatin National Forest,

NorthWestern Energy (NWE) appreciates the opportunity to comment on the Custer Gallatin forest plan revision. NWE operates and maintains electric powerlines and natural gas lines, communications facilities and two hydroelectric projects that could be affected by the revisions to the forest plan. Our electric and gas facilities on the Custer Gallatin forest are authorized under special use permit. The dams are licensed by the Federal Energy Regulatory Commission. The Custer Gallatin National Forest is a key consulting party and active member of our fisheries, recreation, wildlife and water quality technical advisory committees, which provide guidance and regulatory input to the management of the FERC-licensed projects.

Following are NWE's comments on the March 2019 Draft Plan and Draft Environmental Impact Statement:

**Proposed Action-Revised Forest Plan, Custer Gallatin National Forest**

**Section 2.4.44 Eligible Wild and Scenic Rivers (WSR) Desired Conditions (FW-DC-WSR) and Table 27 Madison River #475 and West Rosebud #916**, Eligible wild, scenic, or recreational rivers retain their free-flowing condition, preliminary classification, and the outstandingly remarkable values that provide the basis for their inclusion in the system. **Appendix E: Wild and Scenic Rivers Eligibility Study Process, Table E-2. List of eligible rivers, Madison River #475 (Segment 2) and West Rosebud #916**

**NWE Comment:** Both of the above-noted river segments are downstream of NWE's dams; Hebgen Dam on the Madison River and Mystic Dam on West Rosebud Creek. The river flows in these segments are affected by releases from the respective dams. While some of these support fisheries and others support recreation per our FERC license requirements, other releases are for our power generation needs. Hence the flows are not natural flows, but rather regulated by our dams. The Custer Gallatin National Forest was actively involved in the proceedings to relicense Hebgen and Mystic dams. Wild and scenic designation was never raised as an issue. NWE, USFS and other resource agencies worked together during relicensing to develop an adaptive management strategy that balances all of the river's attributes (including power generation, recreation, fisheries, wildlife, habitat and water quality). This approach has been very effective and we believe there is no need to layer on additional designations that could potentially constrain dam operations.

Thank you, again, for your consideration of our comments.

Sincerely,

Mary Gail Sullivan  
Director, Environmental & Lands Permitting and Compliance