

**USDA FOREST SERVICE  
IDAHO PANHANDLE NATIONAL FORESTS  
COEUR D'ALENE RIVER RANGER DISTRICT  
Kootenai County, Idaho**

**2502 East Sherman Avenue  
Coeur d'Alene, ID 83814-5899  
(208) 769-3000**

**DECISION MEMO  
Brett Creek Watershed Restoration Project**

**OVERVIEW**

The Forest Service has examined proposed aquatic and wildlife habitat improvement activities in the 3,300-acre Brett Creek Watershed, located in the mid to upper end of the North Fork of the Coeur d'Alene River. The Project area is located in T52N, R2E (sections 11-15, 22-26) and R3E (sections 7, 18 and 19). Please refer to the enclosed map.

There are two primary objectives to the proposed activities in the Brett Creek Watershed:

- 1. Improve water quality, fish habitat and riparian habitat by reducing sediment and increasing large woody debris in the main stem of Brett Creek and its headwater tributaries.**

Water yield changes have occurred over historic levels within Brett Creek primarily due to natural events (stand-replacing fires), vegetative changes from logging, and through the extension of the channel networks associated with road building. The most serious process influencing Brett Creek and its headwater tributaries is the failure of roads, road fills, and road channel crossings in close proximity to streams. Several of the roads within Brett Creek watershed have experienced road-related failures, either as a result of inadequate design or construction methods, a lack of maintenance, or the inevitable degradation over time. Typically, where instream failures or evidence of channel instability are found, upstream road-related failures that directly compromise the stream can also be found.

Water quality, fish habitat, and riparian habitat can be improved by removing stream channel crossings, recontouring unstable sections of road, scarifying, seeding, and waterbarring roadbeds of closed roads. Along with the restoration of roads, the introduction of wood and planting of shrubs and conifers would further help improve aquatic habitat and the stability of the stream.

## **2. Preserve big-game security by maintaining current access into the area.**

Roads and motorized use are the biggest impacts to big-game security within the Brett Creek watershed. Large areas of security exist within the unroaded watershed just north of Brett Creek. By removing the roads identified under this proposal, the majority of the watershed would continue to provide excellent big-game security.

### **Proposed Action**

Proposed activities involve watershed restoration (removal stream channel crossings and road segments of concern, stream bank stabilization, and riparian habitat improvement), fish habitat improvement (introduction of large woody debris to provide cover and stream stability), and wildlife security (limiting access into the area to foot or horseback). One action alternative was developed that addresses the majority of the concerns through the activities described above.

### **THE DECISION**

It is my decision to proceed with the proposed activities identified for this project:

1. Restoration work will be conducted on all 19 miles of road in the Brett Creek watershed.
  - a. 42 of the 43 road channel crossings will be removed (the remaining road channel crossing is at the bridge on the Coeur d'Alene River Road #208 and will not be removed)
  - b. The unstable sections of road (including those sections that directly encroach on the stream channel) will be recontoured
  - c. Waterbars will be constructed on the road surface
2. Instream work will be implemented in the lower one-half mile above Brett Creek's confluence with the North Fork of the Coeur d'Alene River.
  - a. Unstable banks will be stabilized with wood and rock,
  - b. Large woody debris will be introduced to the stream
  - c. Native vegetation will be planted along the stream banks and riparian area to provide additional bank stability and future large woody debris recruitment

Recontouring will be used to remove sections of road that are negatively affecting stream morphology and/or that pose a risk to environmental resources and public safety. The roads will be recontoured for a distance of 200 feet to discourage illegal use of the road with motorized vehicles. Motorized traffic would cause resource damage, and it would be dangerous to attempt to cross the channel sites with motorized vehicles. When the road channel crossings are removed, the road prism is returned to the natural contour of the land.

When introducing large woody debris, large wood with rootwads attached are preferable, but not always available. The largest diameter wood available will be used.

Standards and Guidelines of the Inland Native Fish Strategy were followed in the development of this proposal, and will be followed during project implementation. Standard Best Management

Practices will be included in the project work contract and enforced during administration of the contract. Existing vegetation on the road prism will be retained, as it provides good erosion control. The contractor will be required to walk over the established vegetation to accomplish the improvement work. The only exception will be on road 995 where access will be needed to retrieve down woody debris for the instream work in the lower section.

The removal of road fill will only occur in those areas that are within the flood-prone area. No instream work will occur prior to the anticipated conclusion of fry emergence (July 15) to reduce impacts to fisheries.

Riparian planting will occur in the spring, after snow has melted from the riparian area. The planting will include both native shrub species and other species such as conifers. Existing riparian vegetation along the lower half-mile of the stream will be preserved as much as possible by limiting the number of access points into the areas where bank stabilization and/or wood introduction is needed.

Direct, indirect and cumulative effects to area resources have been considered, as documented below, in the attachments to this decision memo, and in the project files. Based on the activities to be implemented and anticipated effects, I have determined that no mitigation measures are necessary.

## **EXISTING SITUATION**

Brett Creek is a 5.2 square mile, fourth-order drainage in a southeasterly trending drainage and a tributary to the North Fork of the Coeur d'Alene River. Valley slopes are steep (50 to 70 percent) and vegetated predominately with immature conifers. The lower 2 miles of the riparian influenced area is characterized by a broad floodplain ranging from 50 to 200 feet wide and vegetated with predominately shrubs, grasses and scattered conifers. The riparian community is well established low to high brush and perennial grass down to within a half-mile of the confluence with the North Fork of the Coeur d'Alene River. The lower half-mile of the riparian community is characterized by scattered low to high brush, some perennial grass, and annual grass and forbs. Road 995 is a dominant feature in the riparian-influenced area. The key concerns in Brett Creek are:

1. The catastrophic delivery of sediment to the main channel from failures of the streamside road and channelization of the lower channel by infringement of the road in the riparian area
2. Sediment delivery from failing road channel crossings in the headwater tributaries
3. Continued instream channel erosion from unstable channel banks in the lower reach.

### **Stream Channel Morphology**

Because stream channel shape and function are primary determinants of habitat quality for native fish, stream channel morphology is identified as the primary issue. The concept of dynamic equilibrium is useful in evaluating stream systems and their stage of development. The complexity of variables is immense. Consequently, dynamic equilibrium cannot be well

defined. Nonetheless, the stability of a channel is a function of the relationship between the sediment load and size, and the channel slope and stream discharge (Lane, 1955). A significant change in any of these will disrupt equilibrium. Dynamic equilibrium, often used synonymously with channel stability, does not imply absolute equilibrium conditions. Rather, conditions of dynamic equilibrium suggest that the stream can adjust to a new hydraulic situation within a relatively short period of time (Heede, 1980).

**Streamflow Regime**

Brett Creek falls into the category of perennial flow dominated by snowmelt and storm flow events. Past historical events have altered the timing, flow duration, and magnitude of those flows.

The hydrologic regime in Brett Creek, influenced by past fires and management activities, has been altered in four respects. First, it can be inferred from the annual water yield increases that periods of spring peak flow are longer in duration (Troendle and King, 1983). The timing of runoff from increased water yields is dependent upon air and snowpack temperature and exposure to solar radiation, which are controlled by elevation, aspect, slope, and shading from topography and/or vegetation.

Second, data from the Idaho Panhandle National Forests and several studies (Kappesser, 1991; Christner and Harr, 1992; Harr, 1981) suggest that rain-on-snow generated peak flows increase in magnitude significantly because of tree canopy removal. Third, the effective gradient of some of the channels has been increased. This is evident in the headwater channels and along the lower reach that have had large woody debris (pool creators) removed during timber harvest, and in the main Brett Creek channel that has been straightened in areas by road placement. Peak flows of longer duration, peak flows of increased magnitude, and increased channel gradients result in increased stream power. Increases in stream power result in increased competence and sediment transport. The data represented in Table 1 indicate that annual runoff and rain-on-snow generated peak flow risk in greatly increased.

Fourth, subsurface flows intercepted by road cuts can be rapidly routed by compacted road surfaces to stream channels. This is a special concern when roads are located low in the watershed and where roads traverse clearcuts. Megahan (1983) noted that the volume of water intercepted by road cuts below clearcuts that have been burned, increased by 96 percent. A review of the road inventory data suggests that minimal evidence of road surface water routing to channels exists.

**TABLE 1. Existing Percent Equivalent Clearcut Acres, Percent Increased Annual Water Yields, and Rain-on-Snow Risk. \***

<b>Watershed</b>	<b>Acres</b>	<b>Percent Equivalent Clearcut Acres</b>	<b>Percent Water Yield</b>	<b>Rain-on-Snow Risk</b>
Brett Creek	3,330	5.9	2.6	1.10

\* The values represented in Table 1 display calculations for Brett Creek from February of 1997. Current values would be expected to be slightly less than those displayed above because no further activity has occurred, allowing for further recovery from past management and fire events.

## **Stream Channel Stability**

Road 995 is the dominant feature of the riparian area in the middle portion of Brett Creek. Streams that have been constricted by roads are less able to handle the increased energy associated with large flow or sediment inputs. Channel pattern changes resulting from streamside road placement may result in drastic and long-term changes to the streamflow and sediment routing regime. Additionally, streamside roads are subject to frequent or continual stress of flow against the road fill, particularly during peak discharges. These roads manifest frequent and often large failures and can be a chronic source of sediment to the stream.

Encroaching road surveys indicate that 2,300 feet of Road 995 in the lower 2 miles of Brett Creek encroach directly on the stream channel during normal bankfull events. One failure discovered in the road surveys conducted in July of 1999 has contributed an estimated 5 tons of roadfill and will be a chronic sediment source until the meander removes that section of road.

The stability and biological function of certain stream types is directly linked to the type, amount, and extent of large, woody organic debris. Within the Brett Creek drainage, the stream types that make up the majority of the stream length are A and B channel types (Rosgen's Channel Classifications, 1994). These two channel types are dependent upon large woody debris for the alternating step/pool bed features which help maintain overall stream channel stability and fish habitat. With the absence of sufficient large woody debris, an increase in the step/pool spacing can reduce the characteristic mode of natural energy dissipation and frequently corresponds to a reduction in fish habitat. Management activities that have occurred in the headwaters and along the lower reaches removed a large portion of the woody debris component. Along with the fires, that drastically reduced large woody debris recruitment potential, the removal of large wood from the streams has reduced both the stability of the stream channel and an important component for native fish habitat.

## **Water Quality**

Approximately 19 miles of road and 43 road channel crossings exist in the Brett Creek drainage. Each of the road channel crossings, particularly on these roads that are no longer maintained, has the potential to plug and subsequently fail. Fills at channel crossings without plugged culverts, may also fail because of exceptionally steep slopes and/or unstable soils. In addition, sediment has been released from headwater areas through harvest of riparian-influenced areas and the "cleaning" of channel debris. Some bank erosion was evident along the lower main Brett Creek channel and headwater tributaries. Of the 43 road channel crossings inventoried, 1 (2 percent) has failed and 18 (42 percent) are in the process of failing. By today's standards, 58 percent of the culverts are undersized, increasing the potential for failure. The increased potential for road channel crossing failures, continual bank erosion and road fill failures of the streamside road are the primary sediment contributors and component of disturbance to the lower and headwater areas of the watershed.

## **Access**

The area is currently used primarily by hunters who enter the area on foot or by horseback. The roads into the Brett Creek drainage have been closed to motorized use since the early 1980's

(CFR closure 36 CF 261.54(a)), and the vegetation has grown in to the point that the roads are not passable by ATV's, snowmobiles, or even motorcycles. Please refer to the photographs provided in Attachment B.

The roads where the restoration activities will occur do not currently and are not needed to provide access to crews for the purpose of fire suppression. Three helispots currently exist along the ridge dividing the Brett Creek and Tepee Creek drainages, which would allow crews to effectively respond to fires in this vicinity. Also, Road 988 would allow fire crews to access the area. A map displaying location of the helispots is provided in the project files.

### **Other Features of the Area**

There is one mine within the Brett Creek drainage. The mine site has been inventoried, and it was determined that the mine poses to risk to the environment or to human safety. Supporting information is provided in the project files.

### **EFFECTS OF THE ACTIVITIES THAT WILL OCCUR UNDER THIS DECISION**

Improvements to the watershed and fisheries habitat because of restoration activities under the Selected Alternative will help promote channel condition improvement over the long term. There will be a reduction in sediment as a result of removing stream channel crossings and roads (including encroaching sections of road). The direct effect of this work will be a short-term introduction of fine sediment at localized sites, which is not expected to adversely affect channel conditions. Other direct effects include reducing the risk of channel crossing failure and contributing area. Removing culverts eliminates flow constriction, which in turn reduces flow velocities at local sites.

The indirect effects of the watershed and fisheries improvement work includes decreasing fine sediment and bedload sources, increasing flood prone area, reducing risks of catastrophic channel failures, and allowing streams to dynamically adjust to flows and sediment. This will provide a gradual decline in sediment routing downstream, which in turn will provide improved conditions for beneficial uses.

Cumulatively, less bed and bank and road erosion can be expected with the implementation of watershed improvement work associated with this alternative. Bedload and fine sediment routing to down stream reaches of Brett Creek and the Coeur d'Alene River will also be reduced. The lower channel will more rapidly evolve toward conditions of greater sinuosity, and become narrower and deeper. The removal of Road 995 will eliminate a chronic source of sediment and allow for the development of stable streambanks and a more stable channel. The placement of large wood will reduce bank erosion, help to meter the flow of sediment and increase the complexity of aquatic habitats. The balancing of streamflow and sediment represents a positive trend in the headwater tributaries as well as the lower reaches of Brett Creek.

### **OTHER OPTIONS CONSIDERED**

A No-Action Alternative was considered, under which the proposed activities would not occur. If the No-Action Alternative were selected, vegetative recovery would continue to recover from

past fires and harvest activities. Disturbances to the hydrologic regime from timber harvest would continue to decline, with the disturbance caused by the fires of the early 1930's expected to be fully recovered shortly after the turn of the century. The duration and magnitude of spring and rain-on-snow peak flows would continue to decline, but channel gradients would remain too steep because of channel straightening by streamside roads.

The risk of further channel morphology deterioration and recovery delay to the natural channel function would remain high. Although elevated water yields are slowly recovering, the risk of continued sediment delivery would remain high as long as there is significant road development in riparian-influenced areas.

The risk for further sediment loading and mass failures would remain high. No maintenance of road channel crossings is expected in the foreseeable future. With nearly half of the road channel crossings at a stage that the next major storm event may start causing further failures, the potential for increased sediment inputs would be high. Without watershed improvement work, these failing road channel crossings would continue to be a constant sediment source to the lower and mid reaches in Brett Creek.

Cumulatively, the streamflow regime would continue to recover as vegetative cover increases. The potential for sediment loading would remain high due to the failing road channel crossings along the riparian Road 995 and the other unmaintained road channel crossing in the headwater reaches, and the remaining portion of Road 995. In areas of constriction, the Road 995 would continue to contribute sediment with every high water event. Without watershed improvement work, the balance between streamflow and sediment would likely deteriorate before it would improve.

The No-Action Alternative was not selected for implementation because it would not result in the level of improvement to the watershed and fisheries habitat that will occur under the selected alternative.

### **CATEGORICAL EXCLUSION**

Specific categories of actions are excluded from documentation in an environmental impact statement or environmental assessment (Forest Service Handbook 1909.15. These projects are termed Categorical Exclusions. This proposal meets the criteria to be categorically excluded under FSH 1909.15; 31.1b, part 4 (repair and maintenance of roads, trails, and landline boundaries) and 31.2, part 7 (modification or maintenance of stream or lake aquatic habitat improvement structures using native materials or normal practices).

It has been determined that no extraordinary circumstances exist, and that no conditions exist which might cause the action to have significant effects on the human environment:

- a. There are no steep slopes or highly erosive soils where the activities will occur.
- b. This project will have no significant effect to Threatened, Endangered, Sensitive or candidate species or their habitat. Biological Assessments and Evaluations have been completed and are part of the Project File.

- c. There are no municipal watersheds in the analysis area. The activities will occur in a floodplain; however, the activities are expected to benefit hydrologic function.
- d. The area where the project activities will occur is not part of any designated or proposed wilderness, wilderness study area, or National Recreation Area.
- e. The area where the project activities will occur is not part of any inventoried roadless area.
- f. The area where the project activities will occur is not part of any Research Natural Area.
- g. The area has been previously surveyed; there are no Native American religious or cultural sites, archaeological sites, or historic properties or areas in the vicinity of where project activities will occur.

### COMPLIANCE WITH THE NATIONAL FOREST MANAGEMENT ACT

This decision will be implemented in compliance with the Forest Plan for the Idaho Panhandle National Forests. The National Forest Management Act and accompanying regulations require that several specific findings be documented at the project level. These findings are as follows:

**Forest Plan Consistency:** The implementation of project activities is consistent with Forest Plan standards, goals, and objectives as described in this Decision Memo. The activities addressed under this action will be consistent with management direction and methods identified in the Forest Plan for Idaho Panhandle Forests. Project activities are consistent with Inland Native Fish Strategy standards and guidelines.

**Suitability for Timber Production:** No standing timber will be felled except where it constitutes a safety hazard.

**Clearcut and Even-Age Management:** No standing timber will be felled except where it constitutes a safety hazard.

**Vegetation Manipulation:** All proposals that involve vegetation manipulation of tree cover for any purpose must comply with the seven requirements found in 36 CFR 219.27(b). No standing timber will be felled except where it constitutes a safety hazard.

**Transportation Facilities:** Existing roads will be used. No new road construction will take place.

**Monitoring:** Activities in the Brett Creek Watershed Restoration project area would comply with specific monitoring requirements identified by the Forest Plan (Forest Plan, Chapter IV).

### PUBLIC INVOLVEMENT

On October 2, 2000, a scoping letter was mailed to those people on the Quarterly Report mail list, which includes nearly 300 individuals, organizations, other agencies, and tribal representatives. The letter provided a description of the Brett Creek watershed and associated concerns. The proposed activities were discussed, and the public was invited to provide comments and recommendations. During the 30-day public comment period, eight letters were received on the project. The letters

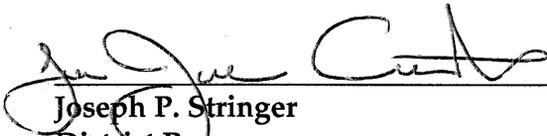
received for the proposal brought forward specific questions and recommendations. Concerns identified in the comment letters are addressed in Attachment A to this decision document.

**DOCUMENTS AND PROJECT FILES**

This Decision Memo summarizes the analyses that led to this decision. More reports and analyses documentation have been referenced or developed during the course of this project and are part of the Project Files. All project files are available for review by the public. Please contact the NEPA Coordinator at the Fernan Office of the Coeur d'Alene River Ranger District to review the files.

**APPEAL RIGHTS AND IMPLEMENTATION**

This decision is not subject to appeal pursuant to 36 CFR 215(4). Implementation of the project activities will begin in approximately 15 working days. For more information, please contact Project Team Leader John Ruebke at the Fernan Office of the Coeur d'Alene River Ranger District, (208) 664-2318. I have been delegated the authority and am the Responsible Official for this decision.



---

**Joseph P. Stringer**  
District Ranger  
Coeur d'Alene River Ranger District  
Idaho Panhandle National Forests  
(208) 664-2318

6/19/01  
Date

## Attachment A Issues Brought Forward During Public Scoping

---

### 1. Comments submitted by the Alliance for the Wild Rockies

The Alliance indicated support for the project. No response to comments is needed.

### 2. Comments submitted by the Ecology Center

- a. The map shows a mine site in the watershed. Is this a concern for water quality?

*The mine site has been inventoried and it was determined that the mine poses no risk to environmental resources or to public safety (Decision Memo, p. 6). Further documentation on the mine can be found in the project records.*

- b. Will the work be done by the Forest Service or will it be placed up for bid by private contractors?

*The project will be advertised as a public works contract and put out for bid.*

### 3. Comments submitted by Idaho Department of Environmental Quality

- a. Standard best management practices, including but not limited to silt fences and hay bails, should be in place to reduce sediment and turbidity during construction.

*Standard Best Management practices will be built into the contract and enforced during the administration of the contract.*

- b. The timing of construction should be scheduled during seasonal low flows and meet both fisheries and riparian planting windows. To the extent possible, existing vegetation should be preserved.

*As with all similar improvement projects, this work will not be allowed to commence before the time fry emergence normally concludes (July 15). The riparian planting, which will include both native shrub species and possibly conifers, will occur in the spring after snows have melted out of the riparian area. Existing riparian vegetation along the lower half mile will be preserved as much as possible by having only a minimum number of access points into the areas needing bank stabilization and wood introduction. All sites that are disturbed will be replanted and or seeded with native material collected on site.*

### 4. Comments submitted by Kootenai Environmental Alliance

- a. How many of the road channel crossings being removed are steel culverts? If there are any culverts to be removed that are 24" in size or larger, the document should indicate

how many of these culverts would be removed. Are there any culvert failures due to high peak flows for culverts 24" and greater?

*Within the watershed there are 13 culverts that are 24 inches or greater in size. Of those, 8 are undersized pipes (based on the hydrologic regime and the size of the drainage areas above each of the culverts). Of the 8, 1 culvert has already failed and 7 culverts are in the process of failing. The remaining 5 culverts were sized correctly and are all functioning at this time, but are still at risk since they do not receive any maintenance. All the culverts 24 inches or greater will be removed with this project.*

*There are 27 culverts within the watershed that are 18 inches in size. Of these, 10 are in the process of failing. They are all undersized and plugged with debris, further reducing their capacity to flow water.*

*There has been no evidence of correctly sized culverts having flows that topped the capacity of the pipe and crossed the road prism. The biggest problem (even with correctly-sized culverts) is that these culverts are intended to pass water, not all the other woody debris that moves through with the flows.*

- b. The document should indicate if the TSMRS database contains data that would indicate the size of the trees that are in the 2,800 acres that were burned approximately 70 years ago.

*This information was not included in the analysis because it is irrelevant to the project. The TSMRS categorizes tree stands by size class. The stand of trees on the south side of Brett Creek is composed of thick pole-sized mixed conifers. The north side varies in densities with mostly immature saw timber.*

- c. The document should indicate the expected cost of the proposed restoration activities and the source of funds.

*The expected costs of implementing the project is between \$100,000-\$200,000. This estimate is based on other similar watershed improvement contracts, but further surveys of the lower half-mile of stream will need to be conducted. The work will be accomplished by putting out one contract for the road-related work, and another contract for the instream work (which would not occur in the same year). No funding has been set aside for this project. We will seek funding as opportunities become available.*

## **5. Comments submitted by Archie George**

Mr. George indicated support of the restoration activities. No response to comments is needed.

## 6. Comments submitted by Attorney Paul A. Turcke, on behalf of Blue Ribbon Coalition

- a. The Forest Service has not adequately considered the impact of the project on recreational use.

*Recreation use in the Brett Creek area primarily consists of hunters who hike or take horses into the area. All of the roads within the watershed have been closed to motorized use since the early 1980's as provided under 36 CFR 261.54(a). Forest Supervisor David J. Wright signed a new Travel Order dated January 8, 2001, which replaces the earlier restriction, and identifies the roads within the Brett Creek drainage as closed to motorized use (Order No. D3-00-005). The roads involved in this restoration project have been grown over by small trees, brush and other vegetation to such an extent that they are often not accessible by ATV, snowmobile, or motorcycle. Other recreational opportunities by foot or horseback will not be affected with the implementation of this project.*

- b. The Forest Service should avoid taking action that diminishes its ability to fight forest fires.

*The roads where the restoration activities will occur do not currently and are not needed to provide access to crews for the purpose of fire suppression. Three helispots currently exist along the ridge dividing the Brett Creek and Tepee Creek drainages, which would allow crews to effectively respond to fires in this vicinity. Also, Road 988 would allow fire crews to access the area. A map displaying location of the helispots is provided in the project files.*

- c. The Forest Service is in peril of violating NEPA if it proceeds with the project without issuing an Environmental Impact Statement.

*Specific categories of actions are excluded from documentation in an environmental impact statement or environmental assessment (Forest Service Handbook 1909.15. These projects are termed Categorical Exclusions. This proposal meets the criteria to be categorically excluded under FSH 1909.15; 31.1b, part 4 (repair and maintenance of roads, trails, and landline boundaries) and 31.2, part 7 (modification or maintenance of stream or lake aquatic habitat improvement structures using native materials or normal practices). Site-specific analysis has occurred under this Categorical Exclusion. Refer to pages 7-8 of the Decision Memo for additional information regarding why a Categorical Exclusion/Decision Memo is appropriate for this proposal.*

- d. The information provided in the October 2 letter does not adequately inform the public about the full impact of the project.

*Scoping is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR 1501.7). The October 2, 2000 scoping letter provided the public with an overview of the Brett Creek watershed, a brief discussion of past activities and events that have influenced the watershed, a description of the proposed activities, and identification of the specific conditions that warrant the proposed activities. The public was asked to identify concerns related to the proposal. At the time the scoping letter was sent to the public, the analysis process had not been completed. Based on the location, timing and extent of the proposed activities and the anticipated effects, it was*

*determined that the proposal met the criteria to be categorically excluded from documentation in an environmental assessment or impact statement (Decision Memo, pages 7-8). Therefore, the analysis findings are disclosed in this Decision Memo, as provided by Forest Service Handbook (FSH) 1909.15, Chapter 30.*

## **7. Comments submitted by Coeur d'Alene River Big Game Outfitters**

- a. Perhaps the lower four culverts would be the only ones necessary to remove. That way the road would not have to be reopened and the vegetation established in the upper portion could remain intact.

*As part of the public works contract, the contractor will be required to walk over the established vegetation to do the improvement work. Only the 995 will need to have some of the vegetation removed in order to access areas of windfalls. This wood gathered will be used for the instream improvement work. None of the roads in the headwaters will have the vegetation cleared from the road prism as this provides good erosion control. Not removing the road channel crossings in the headwaters will do more to degrade the watershed than opening the road system. These road channel crossings are in the process of failing and timing is very critical.*

- b. As this is prime wildlife winter and summer range, (at least portions of) Roads 988 and 995 should be obliterated.

*As part of the watershed restoration, those sections of Road 995 that directly encroach on the stream will be recontoured to eliminate known and potential sediment sources, as well as at the channel crossings that will be removed. Also after the restoration activities are completed a minimum of 200 feet at the beginning of the road will be recontoured to provide security of the work accomplished. Road 998, which runs along the ridge, poses no hydrological problems at this time and is not anticipated to in the future, so will not be part of this decision.*

## **8. Comments submitted by Idaho Fish and Game.**

- a. Where roads are currently impassable, and are not having a negative impact on the hydrologic regime of the watershed, we recommend removing the culverts with equipment or tools, which will not result in making the road prisms usable for motorized traffic.

*As part of the public works contract, the contractor will be required to walk over the established vegetation to do the improvement work. Only the 995 will need to have some of the vegetation removed in order to access areas of windfalls. This wood gathered will be used for the instream improvement work. None of the roads in the headwaters will have the vegetation cleared from the road prism as this provides good erosion control. After the improvement work is complete the 995 road will be closed by recontouring. As access will need to be maintained since the road removal and instream work most likely will not occur in the same year, the gate at the junction with the 208 (River Road) will remain in place until all the work is complete.*

- b. Where road prisms are negatively affecting the watershed, we recommend obliteration in a fashion that removes the threats and prevents access by motorized vehicles. If recontouring only the first quarter mile (for example) of a road will meet all the objective, and will result in stretching dollars for additional work, we recommend that approach.

*Recontouring is a tool that will be used to remove sections of roads that are negatively affecting stream morphology by either encroaching directly on the stream, and or is contributing sediment due to road fill failures. The majority of the problems are at the road channel crossings or along the lower riparian road. Recontouring is also a tool used to close the roads after the watershed work is complete. From a safety and resource standpoint, the roads are recontoured for the first 200 feet to limit access due to the nature of the work. Resource damage would occur if motorized traffic were allowed to access where the improvement work will occur, and it would be dangerous to attempt to cross the channel sites on ATV's or motorcycles. When the culverts are removed, the crossings are returned to the natural contour of the land. This project will not change the access into the area; when work is complete access into the watershed will continue to be by foot or horse travel. .*

- c. We recommend using whole trees, with rootwads, where possible to restore large woody debris loading.

*We are in full agreement with using large wood with rootwads attached for both bank protection and restoring the large woody debris component. As with other similar projects, we are restricted in the log length we use, since we usually cannot find enough local windfalls and have to instead haul wood into the area; however, we try to use the largest diameter wood we can find.*

01

**Alliance for the**

PO Box 8731 • Missoula, Montana • 59807  
Ph: 406-721-5420 • Fax: 406-721-9917



**Wild Rockies**

Web: <http://www.wildrockies.org/awr>  
Email: [awr@wildrockies.org](mailto:awr@wildrockies.org)

Mr. Jose Castro, District Ranger

10/9/00

2502 East Sherman Ave.  
Coeur d' Alene ID 83814

Rec'd 10-16-2000

Mr. Castro:

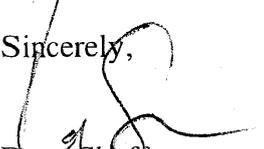
These are comments regarding the Brett Creek Watershed Restoration project on behalf of the Alliance for the wild Rockies (AWR) and our 3000 members. Thank you for the opportunity to comment on this proposal.

AWR is in full support of this project as outlined in the scoping statement. It appears that the Coeur d 'Alene Ranger District has studied and understands the cause of a widespread problem on our National Forest Lands. Specifically, the adverse impacts of timber harvesting and road building. The fact that you have proposed a project that directly addresses this problem and seems to reverse this trend is to be commended. Responsible management and leadership requires the integrity to acknowledge past errors by moving in a new direction, in this case the restoration of our scarred National Forest Lands.

Of course, we would also hope that the current scenario in the Brett Creek Watershed is used as a learning opportunity by the Forest Service. The effects of logging in burned watersheds, logging in riparian areas, and the effects of road building are clear. As you know, the forests of the Northern Rocky Mountains evolved over thousands and thousands of years with natural fire and some degree of resulting sedimentation, they did not develop and sustain themselves with road building and logging.

We request that the Panhandle National Forest complete the appropriate NEPA process for this proposal and keep AWR updated on the status of the project.

Sincerely,

  
Ryan Shaffer  
Alliance for the Wild Rockies

**Missoula Office:**

801 D Sherwood St. • Missoula, MT • 59802  
406-721-5420 • [awr@wildrockies.org](mailto:awr@wildrockies.org)

**Boise Office:**

1714 Heron • Boise, Idaho • 83702  
208-386-9014 • [wildrockies@lesbois.com](mailto:wildrockies@lesbois.com)

**Ecosystem Defense Program**

406-542-0050  
[awr-defense@wildrockies.org](mailto:awr-defense@wildrockies.org)

**The Ecology Center, Inc.**

801 Sherwood Street, Suite B  
Missoula, MT 59802  
(406) 728-5733  
(406) 728-9432 fax  
*ecocenter@wildrockies.org*

02

October 10, 2000

Rec'd 10-12-2000

Jose Castro, Acting District Ranger  
Coeur d'Alene River Ranger District  
2502 E. Sherman Ave.  
Coeur d'Alene, Idaho 83814

Mr. Castro:

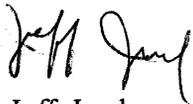
I am responding to your October 2, 2000 letter regarding a proposal to restore the Brett Creek Watershed. This is the kind of active restoration work that ought to be of highest priority on national forest lands, and we commend you for taking on this project. I have a few questions relating to this project.

The map shows a mine site in the watershed. Is this a concern for water quality?

Will the work be done by the Forest Service, or will it be placed up for bid by private contractors? If the latter, I am interested in finding out the dollar value of the contract, when it is determined.

Thank you for your attention to these questions, and thanks again for proposing such restoration. Please keep us on the list to receive all future mailings concerning this project.

Sincerely,



Jeff Juel



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

03

Rec'd 10-18-2000

2110 Ironwood Parkway • Coeur d'Alene, Idaho 83814-2648 • (208) 769-1422

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

October 11, 2000

Joe Castro  
Idaho Panhandle National Forests  
Fernan Office  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

Dear Mr. Castro:

This office has had an opportunity to review your proposal for aquatic restoration of Brett Creek. The Idaho Department of Environmental Quality (DEQ) supports your proposal to improve water quality, bank stability, and fish habitat within Brett Creek and the North Fork Coeur d'Alene River Basin. The Brett Creek proposal is in line with a sediment Total Maximum Daily Load currently being developed for the North Fork of the Coeur d'Alene River by DEQ.

There are factors that should be considered in the planning and implementation phases of the restoration work should this proposal be supported. Standard best management practices, including but not limited to silt fences and hay bails, should be in place to reduce sediment and turbidity during construction. The timing of construction should be scheduled during seasonal low flows and meet both fisheries and riparian planting windows. To the extent possible, the existing vegetation should be preserved. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "David Stasney".

David Stasney  
Water Quality Scientist



04

Rec'd  
10-12-2000

## *Kootenai Environmental Alliance*

P.O. Box 1598 Coeur d'Alene, ID 83816-1598

Jose Castro, District Ranger  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

October 11, 2000

Dear Mr. Castro:

The following comments are in regards to the proposed watershed restoration activities in the Brett Creek Watershed.

1. Page 1 of the October 2, 2000 letter mentions 43 road channel crossings. Page 2 discusses the removal of 42 stream channel crossings. The document being prepared should indicate how many of the stream channel crossings are steel culverts, and list the number of steel culverts that would be removed, if that number is other than 42. If there are any culverts to be removed that are 24" in size or larger, the document should indicate how many of these culverts would be removed.
2. Page 1 also mentions that 42% of the road channel crossings are starting to fail. The document being prepared should indicate if any of the failures are related to peak flows of water that are overflowing one or more of the culverts. According to the Idaho Department of Lands document that lists the rules relating to the IFPA, July 1998, page 12, a 24" pipe can flow 12 cfs. 12 cfs equals approximately 5,385.96 gallons of water per minute or approximately 323,160 gallons of water per hour. If there are one or more 24" culverts that are failing due to peak flows of water in excess of the capacity of the 24" pipe, the document being prepared should indicate if these pipes are in areas where logging in the 1970's and 1980's took place. If there are any pipes that are larger than 24" and these pipes are failing due to high peak flows, the document should indicate the locations of these pipes.
3. If there are no pipes in the watershed that are 24" or larger, the document being prepared should indicate the sizes of the smaller pipes that are failing due to peak flows of water. An 18" pipe can flow 6 cfs, which is approximately 2,692.98 gallons of water per minute or approximately 161,580 gallons of water per hour. The locations of the pipes that are 18" in size and that are failing due to peak flows of water should be displayed in the document being produced.
4. The document being prepared should also indicate if the TSMRS database contains data that would indicate the size of the trees that are in the 2,800 acres that were burned approximately 70 years ago.

5. The document should also indicate the expected cost of the proposed restoration activities and the source of the funds to perform the work. We are supportive of the proposed activities and wish to receive a copy of the final decision document.

Sincerely,

*Mike Mihelich*

Mike Mihelich

Forestry and Water Committee

A map displaying the location of the restoration work is enclosed. These activities would improve water quality and fish habitat by reducing sediment production that is detrimental to stream channel integrity and provide additional fish passage. Access would be limited to foot travel providing for primitive recreation opportunities.

I would like to learn your thoughts on this proposal. Please mail your comments to our Fernan office at the address above. Comments received, including names and addresses of those who comment, will be considered part of the public record on the proposed action and will be available for public review. This proposal meets the criteria to be categorically excluded from documentation in an environmental assessment or environmental impact statement (Forest Service Handbook 1909.15, part 30). I anticipate making a decision regarding this proposal by November 1, 2000.

If you have any questions concerning this project or process, please feel free to contact John Ruebke at (208) 769-3000.

Sincerely,

#05

  
JOSE CASTRO  
District Ranger

Enclosure

10-7-00

Dear Mr. Castro;

I'm all in favor of restoration activities described in this letter. Too many of our streams have been affected by roads, logging and fire debris.

Archie George  
Moscow Idaho  
83843

06

# MOORE SMITH BUXTON & TURCKE, CHARTERED

ATTORNEYS AT LAW

225 NORTH 9<sup>TH</sup> STREET, SUITE 420  
BOISE, ID 83702  
TELEPHONE: (208) 331-1800 FAX: (208) 331-1202

DAVID H. BIETER  
SUSAN E. BUXTON \*  
JOSEPH D. MALLET  
JOHN J. MCFADDEN \*‡  
MICHAEL C. MOORE ‡  
BRUCE M. SMITH  
PAUL A. TURCKE ◊

\* Also admitted in Oregon  
‡ Also admitted in Washington  
◊ Also admitted in South Dakota

October 31, 2000

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Jose Castro  
District Ranger  
Coeur d' Alene River Ranger District  
2502 E. Sherman Ave.  
Coeur d' Alene, ID 83814

Re: Brett Creek Watershed Road/ Trail Removal Project

Dear Mr. Castro:

Thank you for the opportunity to comment on the Brett Creek Watershed Proposed Project ("Project"). Our firm represents the BlueRibbon Coalition whose membership includes over 600,000 individuals and member groups nation wide, some of which use the area within the Brett Creek Watershed. These comments are supplemental to any comments submitted by BlueRibbon Coalition members and we reserve the right to amend these comments as we learn more about this proposed project.

General Comments

We adamantly oppose the Project as described in the letter you sent dated October 2, 2000 ("letter"). We have three general concerns regarding the Project that must be resolved before the Project should go forward. First, from the information provided in the letter, it appears the Forest Service has failed to adequately analyze the impact this Project will have on recreational use in the Project area. Second, the Forest Service has failed to supply adequate information with respect to whether removing 19 miles of road will adversely effect the Forest Services' ability to suppress future wild fires. Third, the Forest Service is in peril of violating NEPA if it undertakes to remove roads using ground-disturbing methods without issuing site-specific NEPA analysis

### The Forest Service has not Adequately Considered the Impact of the Project on Recreational Use.

The October 2 letter does not address the impact the Project will have on recreational use in the project area. The letter asserts that “[a]ll the roads within the Brett Creek Drainage are currently impassable by motor vehicle due to overgrown conditions by brush.” However, it is not clear whether these roads provide access via motorcycles, ATVs, or snowmobiles. Furthermore, we do not know whether these roads provide access via horseback, bicycle, or other means of travel. In fact, the letter asserts that “[a]ccess [to the Project area] would be limited to foot travel providing for primitive recreation opportunities.” This strongly suggests that the Project will have a substantial adverse effect on recreational use and access in the Project area. The Forest Service should make every reasonable effort to avoid diminishing recreational opportunities and access to the Project area.

### The Forest Service should Avoid Taking Action That Diminishes Its Ability to Fight Forest Fires.

The letter implies that one major cause of the aquatic problems in the Project area is past forest fires. Specifically, the letter states that approximately 2800 of the 3330 acres within the Project area have burned leaving most of the area’s hill slopes barren. Therefore, the Forest Service should certainly take steps to ensure that future wild fires will not perpetuate the current aquatic problems in the Project area. The Forest Service should evaluate the utility of the roads earmarked for removal in terms of providing access to the Project area for future fire suppression efforts.

### The Forest Service is in Peril of Violating NEPA if it Proceeds With the Project Without Issuing an Environmental Impact Statement.

Region 4 of the Forest Service has acknowledged that ground-disturbing trail and road closure methods require site-specific NEPA analysis. See, attached, Appeal Decision TM #00-04-00-0047 dated 1/27/00. We believe that the Region 4 decision correctly applies existing law. Therefore, the Forest Service must issue site-specific NEPA analysis before undertaking to remove any roads using ground-disturbing methods. The October 2 letter does not describe or explain the methods the Forest Service will use to remove 19 miles of road. Presumably it will employ ground-disturbing methods if all the roads earmarked for removal are covered over with brush. Therefore, if the Forest Service proceeds with this project under a categorical exclusion the decision will be vulnerable to a valid legal challenge.

### Conclusion and Suggestions

The Brett Creek Watershed Project as described in the letter date October 2 should not be implemented until further analysis is done. The information provided in said letter about the Project does not adequately inform the public about the full impact of the Project. Specifically, it says virtually nothing about the impact the Project will have on recreational use and future fire suppression efforts. Furthermore, if the Project includes implementing ground-disturbing road

removal methods, then the Forest Service must do site-specific NEPA analysis before proceeding.

Given the uncertainty about this project with respect to its impact on recreational use and future fire suppression efforts, we demand that the Forest Service disclose an inventory and profile of each road and/or trail earmarked for removal before proceeding with this project. Said inventory and profile should include a map showing each road, whether each road provides recreation access of any kind, and whether each road provides actual or potential access for fighting wild fires. Furthermore, we demand that the public have adequate opportunity to comment on the project after the Forest Service has disclosed said roads and their characteristics. Finally, we suggest that the Forest Service reconsider its decision to implement this project under a categorical exclusion if it intends to employ ground-disturbing methods of road removal.

Very Truly Yours,

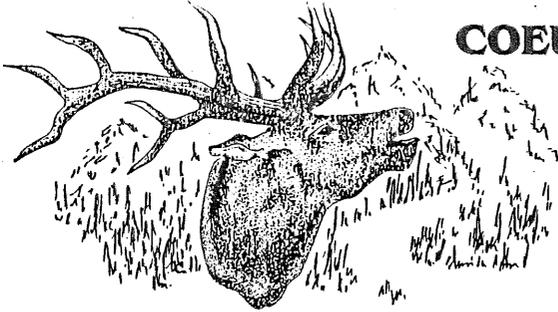
MOORE SMITH BUXTON & TURCKE,  
CHARTERED

A handwritten signature in black ink, appearing to read 'Paul A. Turcke', written in a cursive style.

Paul A. Turcke

PAT/to

cc: Client



07  
**COEUR D'ALENE RIVER BIG GAME OUTFITTERS**

Mountains View Ranch  
East 11400 Nunn Rd.  
Athol, Idaho 83801  
208-683-2154

November 2, 2000

David J. Wright  
Forest Supervisor  
Idaho Panhandle National Forests  
3815 Schreiber Way  
Coeur d'Alene, Id. 83814

RE: Brett Creek Restoration

Dear Supervisor Wright:

Reference is made to the Brett Creek Restoration project and how the forest service will plan to remove the 40 plus culverts there.

As an active outfitter for a number of years on the Panhandle doing hunts in the Brett Creek drainage, I have first hand knowledge of the area. At this time the road number 995 is closed. The upper portion of the road contains grass, brush and 10 to 15 foot-established trees. The majority of the culverts lay in this area. Access to them would be from road 995. I doubt that any contractor would walk to the head of the road system. To take a dozer in to open this road for the purpose of reaching the upper culvert system would be devastating to the fish and wildlife habitat of that drainage, not to mention what it would do to the trees and brush that are trying to reclaim the area from the past clear cutting activities.

I would like to propose that the forest services consider other alternatives. It is my opinion that perhaps the lower four culverts would be the only ones necessary to remove. That way the road would not have to be reopened and the vegetation established in the upper portion could remain in tact. It has somewhat reclaimed the upper culvert system at this time anyhow. Furthermore, as this is prime wildlife winter and summer range, I would also propose that roads 988 and 995 be obliterated, or at least portions of it. See map for details.

If need be I am available to meet with you or a member of your staff to discuss the alternative methods of dealing with the Brett Creek Restoration. I would appreciate hearing from you or a staff member as these decisions are made.

Sincerely,

  
Gary and Jan Sylte

cc: Department of Fish and Game



**IDAHO FISH & GAME**  
PANHANDLE REGION  
2750 Kathleen Avenue  
Coeur d'Alene, Idaho 83815

08

**Dirk Kempthorne** / Governor  
**Rod Sando** / Director  
October 25, 2000

Rec'd 10-30-2000

Mr. Jose Castro  
US Forest Service  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

Dear Jose:

**REFERENCE: BRETT CREEK WATERSHED PROJECT**

We have reviewed the proposed watershed restoration project for the Brett Creek watershed. The proposal calls for removal of 42 stream channel crossings and 19 miles of currently impassable roads, removal of fill material from stream channels associated with riparian roads, artificial recruitment of large woody debris, and fish and riparian habitat enhancement.

We believe this project will provide significant long-term benefits to fish and watershed resources, which have been impaired by road construction, timber harvest, and lack of culvert maintenance. The Scoping Notice does not specify how road removal will occur, so at this point we are concerned whether the road removal will result in conditions that improve the potential for motorized access. The Scoping Notice indicates access would be limited to foot traffic, but does not note whether that will be an enforced closure with gates, or that the roads will be made physically impassable to motorized vehicles. To address these concerns, we recommend the following measures:

- Where roads are currently impassable, and are not having a negative impact on the hydrologic regime of the watershed, we recommend removing the culverts with equipment or tools which will not result in making the road prisms usable for motorized traffic.
- Where road prisms are negatively affecting the watershed, we recommend obliteration in a fashion that removes the threats and prevents access by motorized vehicles. If recontouring only the first quarter mile (for example) of a road will meet all of the objectives, and will result in "stretching" dollars for additional restoration work, we recommend that approach.
- We recommend using whole trees, with rootwads, where possible to restore large woody debris loadings.

Mr. Jose Castro – Page 2  
October 25, 2000

We strongly agree with the proposals to remove fill from stream and floodplain areas, and with managing the area for primitive recreation. Overall we believe this project will improve conditions for fish and wildlife without creating a situation where existing users will feel closed out of an area, and strongly support the proposal.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. Tourtlotte".

Greg Tourtlotte  
Regional Supervisor

GIT:CEC:DJL:kh

C: Tracey Trent, IDFG, Boise  
USFWS, Spokane  
DEQ, Coeur d'Alene

## Attachment B Photographs of the Area

---

The roads into the Brett Creek drainage have been closed to motorized use since the early 1980's. The following photographs were taken at different locations on Road 995 and its spur roads, and depict the various stages of revegetation on the roads.

**Figure B-1. The gate on Road 995.**



**Figure B-2. Small trees down across Road 995.**



**Figure B-3. Three photographs of unnamed spur roads off Road 995.**





**Figure B-4. Spur Road 995-A.**



**Figure B-5. Spur Road 995-B.**



**Figure B-6. Spur Road 995-C.**



**Figure B-7. Spur Road 995-D.**



**Figure B-8. Spur Road 995-E.**



**Figure B-9. Spur Road 995-F.**



**Figure B-10. Spur Road 995-G.**



**Figure B-11. Spur Road 995-H.**



**Figure B-12. Spur Road 995-I.**

