

Decision Notice And Finding of No Significant Impact Upper Lolo Watershed Restoration

**USDA Forest Service
Missoula Ranger District, Lolo National Forest
Missoula County, Montana**

Decision and Reasons for the Decision

Background

The project area drains into Lolo Creek, and then into the Bitterroot River southwest of Missoula, Montana.

There are more than 330 miles of forest road on LNF (Lolo National Forest) and PCTC (Plum Creek Timber Comp) and lands intermingled in the watershed. Most of the roads were built for logging, but recreational use such as OHV (Off Highway Vehicles), snowmobile use, rock climbing, crystal collecting, and hiking has become increasingly important in the last decade.

Following a watershed assessment in 1989, the LNF put a ten-year moratorium on timber harvest on National Forest lands in Upper Lolo Creek because of adverse cumulative effects on water quality and fish habitat.

The purpose of this project is to improve water quality and aquatic habitat by reducing the amount of non-natural sediment delivered to streams by forest roads.

In 1996 and 2003, MTDEQ (the State of Montana, Department of Environmental Quality) listed Lee, Lost Park, Granite, East Fork Lolo, and West Fork Lolo creeks as water quality impaired (303(d)) and unable to fully support the beneficial uses of fisheries or aquatic life. Likely causes of the impairment include building and maintaining roads, winter sanding Highway 12, and past logging practices.

In 1999, the LNF completed a watershed analysis of the Upper Lolo Watershed. The purpose of the analysis was to find out if conditions in the watershed were consistent with standards for the area established in 1986 by the Lolo Forest Plan. The report found that conditions were below standards for watershed and fisheries, and that sediment from forest roads and Highway 12 were responsible for an estimated 99 percent of non-natural sediment. Sediment which adversely affects downstream fish populations.

In 2003, the MTDEQ completed a WQRP (Water Quality Restoration Plan) and TMDL (Total Maximum Daily Loads) for the Upper Lolo Creek area. The plan outlined steps that can be taken to improve water quality.

The project area is located primarily within T11N, R23W, and R24W, with a small portion in R22W. The Upper Lolo Creek watershed is approximately 45,700 acres in size. The watershed is part of the Bitterroot River Sub basin of the Upper Clark Fork River. The principal tributaries in Upper Lolo Creek are Lee Creek, Granite Creek, and both the East and West Forks of Lolo Creek. Specialist reports in the EA and project file may address different creeks, or only a

portion of those listed here depending on the importance of the tributary to the resource being considered. Road mileages in specialist reports and tables may also differ for the same reason. Approximately 37 percent of the watershed area is owned by private landowners, the remainder is administered by the FS (Forest Service).

Decision

The Upper Lolo Watershed Restoration EA (Environmental Assessment) was changed to reflect the comments received during the comment period. The following changes were made to the EA:

- An Appendix was added to the EA to include a road table showing each road, its length, the proposed closure level, and the average cost per mile to implement the closure.
- A description of road closure levels was added to the EA in Chapter 1 (page 1).
- In order to help the reader understand the project and the terms discussed in the EA, a series of definitions was added at the beginning of Chapter 1 (pages 1 and 2).

Based upon my review of the project, I have decided to implement Alternative B, which includes the following activities to improve water quality and fish habitat while maintaining recreational and administrative access:

- Removing or replacing 21 culverts that hinder fish passage or are undersized (not capable of handling a 100 year flood event).
- Permanently closing and reclaiming about 39 miles of overgrown historic roads and about 24 miles of un-drivable jammer roads.
- Decommissioning just over 17 miles of FS roads that are no longer used. Most of these roads are currently closed to the public, except for snowmobile use.
- Reclaiming about two miles of open, drivable FS road.
- Improving about 35 miles of major roads by applying BMP (Best Management Practice) upgrades to reduce sediment generated by the roads that is delivered into streams.
- Replacing a culvert and improving drainage on Trail # 300.

This project will implement the restoration priorities as outlined in the TMDL plan on National Forest lands within the watershed.

Rational for the Decision

My objective in reaching this decision is to provide an environmentally sound and socially acceptable method of reducing sediment and improving water quality in the Upper Lolo Creek drainage. My decision is based on the analysis of the proposed action, applicable laws and regulations, and comments we received throughout the process.

We had considerable help throughout this process from the Lolo Watershed group, representatives from local conservation organizations, and many interested citizens. Their assistance and input was critical in arriving at the final outcome. Included in this document is Appendix A, Response to Comments, to display our response to the input that was received. The comments that were received were helpful in finalizing the EA and arriving at the decision.

In my mind, this decision represents a good starting point to restore balance and improve water quality in the Upper Lolo Creek drainage. In an ideal world, the Forest Service would be able to

do this work with appropriated funding on a well-defined schedule. Making this decision now will allow us to develop a priority listing of roads to be closed, decommissioned, or obliterated, in addition to identifying culverts and bridges to be removed or replaced. It will allow us to work with partners over the next several years to explore funding sources internally and externally that can aid in implementing this decision.

This decision also forms a framework within which we may be able to cooperate with private and industrial landowners to consolidate ownership and cooperated on future restoration projects.

This decision will reach a road density level of 2.8 miles/square mile. A future goal of less than this amount is desirable. A lower road density may be achieved through:

- cooperation with PCTC, either by agreeing to decommission or obliterate roads or consolidate land ownership throughout the area;
- working with the recreation users of the area to identify additional roads that can be decommissioned without affecting their use; or
- additional analysis to identify roads that can be decommissioned after completing vegetative treatments along various road segments.

The decision not to address closure of cost share roads is based on several factors. Cost share roads are under legal easements and agreements between private landowners and the Forest Service. These agreements would preclude the Forest Service from considering closure of these roads. Additionally, many of these roads are heavily used by the public for recreational purposes. These roads will also be needed by the Forest for future land management under the Forest Plan, including fire, future timber management, and recreational access.

This project is a first step in comprehensive watershed restoration. Full restoration would require cooperative involvement with PCTC, a major private landowner in the Upper Lolo Watershed area. An ideal restoration alternative would include acquisition of these private lands by the Forest Service, in addition to increased fire use where it is appropriate to improve ecological conditions, and an inventory and restoration prioritization of roads on Plum Creek land. Roads that are left open within the project area will remain on the forest maintenance schedule, and will be monitored accordingly.

When compared to the No Action alternative, this alternative will better meet the purpose and need by reducing the amount of sediment delivered to the streams. It will allow us to treat the road system, as funding becomes available, to improve watershed resource conditions. It will also speed the implementation of BMP's such as removing or replacing culverts and decommissioning, closing, or limiting access to particular roads. This alternative will allow us to move toward the accomplishment of the goals for soil and water improvement as outlined in the WQRP and the TMDL plan for the Upper Lolo Creek area. The decreased levels of erosion and sediment to the streams will benefit the fisheries throughout the Upper Lolo Creek drainage. This alternative meets the regulatory requirements listed in Chapter 1 of the EA.

Based upon the review of the test for significance and the EA conducted, I have determined that the actions analyzed for the Upper Lolo Watershed Restoration Project are not a major federal action and that its implementation will not significantly affect the quality of the human environment. Accordingly, I have determined that an Environmental Impact Statement need not be prepared for this project.

Other Alternatives Considered

In addition to the selected alternative, I considered the No Action alternative. A comparison of the alternatives can be found in the EA on pages 14 and 15. I also considered 3 alternatives that were suggested during scoping. These included:

A focus on restoration

An alternative was suggested that represented an all-encompassing, ideal scenario for watershed restoration in the Upper Lolo Creek area. It included provisions for consolidating PCTC lands with LNF lands; arriving at road densities of less than 2 miles per square mile within the project area within a short timeframe; focusing management on restoration activities; adopting the principles for restoration as outlined in the Citizens Call for Ecological Forest Restoration; managing under a fire use regime when naturally ignited fires occur; including economic benefits of road closures and improvements; and including a well-defined and prioritized schedule for road decommissioning and improvement.

Budgetary and scheduling concerns and the length of time necessary to complete everything were the primary reasons for not considering this alternative in detail. The costs associated with watershed restoration are high. The agency budgets do not afford many opportunities to conduct restoration activities without an associated revenue generating project, such as a timber sale.

It is expected that a combination of appropriated and contributed funding will be necessary to implement the projects outlined in this analysis. To that end, it is also expected that we will need to accomplish projects as money becomes available, and perhaps not in a pre-scheduled timeframe.

Reduce road density to 1.5 miles per square mile

A second alternative was proposed to reduce road density to 1.5 miles of road per square mile. This alternative was not developed because many of the roads administered by the FS in the project area provide access to private land. The FS is required by law to provide access to private holdings. Many of these roads are under cost share agreements with PCTC. The agreements preclude the Forest from closing these roads without their consideration.

Also, fire fighting, recreation, and vegetation management require road access. If the Forest adopted a goal of reducing road density to 1.5 miles per square mile of forest roads in the area, it would not be acceptable for administrative and public access.

Treat all roads with a level 2 closure

Level 2 closure implies the road will be kept on the LNF road system, and recurring maintenance is required. Undersized CMPs (corrugated metal pipes) would remain in place. The cost of upgrading CMPs to withstand 100 year flood events would be prohibitive, especially since many of the roads are surplus. This level of closure includes scarification of the road rather than deep ripping. Scarification is not as effective in restoring soil infiltration and reducing compaction. The Forest wants to improve the hydrologic function of the watershed, and also reduce maintenance requirements and costs, particularly for roads which are no longer needed.

Mitigation

Design criteria and mitigation measures will be used as needed to diminish adverse environmental effects under various road closure levels. Mitigation techniques applied will be used as needed on a site specific basis.

Generally, only structures at drainages will be removed. Structures which are used to drain ditches generally will not be removed unless they are located within an area to be re-contoured under level 4 or 5 closures or unless the ditch carries a significant amount of water.

Mitigation for the water resource will include using short term sediment buffering devices (straw bales, coconut mats, etc.) at stream crossings where work will be performed.

Impacts for fisheries will be mitigated by timing implementation of any in-stream work to the period between July 15 and September 1. This time period is a window during which trout are not spawning and are not likely to be present in tributary streams.

In order to mitigate for botanical resources, FS Road #33114 will receive a modified level 3 treatment. This modification will avoid impact to the existing *Orogenia fusiformis* occurrence, while leaving most of the road open as potential habitat for further colonization. Alternative A, No Action

Under the No Action alternative, current management plans would continue to guide management of the project area.

Public Involvement

As described in the background, the need for this action arose in the 1980s and 1990s. A watershed improvement proposal for the Upper Lolo Creek was listed in the Schedule of Proposed Actions in October 2003.

In 2003, the MTDEQ completed a WQRP and TMDL for the Upper Lolo Creek watershed. The plan outlines steps that can be taken to improve water quality in the area.

The interdisciplinary team prepared Alternative B: Upper Lolo Watershed Restoration Project to meet the needs and objectives as described in Sections 1.2 and 1.3 of the EA.

On April 20 2005, a scoping letter was sent to approximately 20 individuals, government agencies, and organizations describing the proposal and asking for feedback. An article on the project was published in the newspaper of record, *The Missoulian*, in May of 2005. Seven responses were received.

On June 29, July 15, and August 3, 2005, field trips were conducted with the Lolo Watershed Group, conservation organizations, and interested individuals to show examples of erosion problems and discuss the proposed action.

Comments received by mail and during field trips were generally in support of the project, and brought up issues related to road density and the effect on water quality, recreational motorized access, and noxious weed management. To address these concerns, the Forest Service created the alternatives described above.

Finding of No Significant Impact

I have reviewed the direct, indirect and cumulative effects of the proposed activities documented in the EA for the Upper Lolo Watershed Restoration Project. I have also reviewed the project record for this analysis and the effects of the proposed action and alternatives as disclosed in Chapter 3 of the EA. Implementing regulations for NEPA (40 CFR 1598.27) provide criteria for determining the significance of effects.

The disclosure of effects in the EA found the actions limited in context. The project area is limited in size and the activities limited in duration. Effects are local in nature and are not likely to significantly affect regional or national resources.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effects will be beneficial.

Impacts associated with the project are discussed in Chapter 3 of the EA. These impacts are within the range of those identified in the Forest Plan. The actions would not have significant impacts on resources identified and described in Chapter 3. The effect of the decision to be made is non-significant in the long and short term (EA, Chapters 2 and 3).

(2) The degree to which the proposed action affects public health or safety.

Proposed activities would not significantly affect public health and safety. The purpose of the project is to improve water quality and aquatic habitat by reducing the amount of non-natural sediment delivered to streams by forest roads. Similar activities have not significantly affected public health and safety. Minor short term impacts may include increased sediment production during road obliteration, ripping, and culvert removal or replacements; however, these would be mitigated as discussed in Chapter 2, page 10 of the EA.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

There are no adverse effects to historic places or loss of scientific, cultural, historical, or other unique resources (EA pages 6 through 8). This project is in compliance with the Region 1 programmatic agreement (1995) between the State Historic Preservation Office and the Advisory Council on Historic Preservation. There are no parklands, prime farmlands, wetlands, or wild and scenic rivers within the affected area. There are no inventoried roadless areas within the project area.

(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

An analysis of the proposed action and no action alternatives has been conducted using the best information available and the latest methods of analyzing data by professionals in their respected disciplines. Throughout the analysis process, public comments varied in their recommendations on ways to best manage resources within the project area. However, the effects of the proposed alternatives on the various resources (EA, Chapter 3) are not considered to be highly controversial by professionals, specialists and scientists from associated fields of forestry, wildlife biology and management, fisheries, and hydrology. While the selected alternative may be controversial, I do not believe that there is significant controversy over the effects of this action.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

Scoping did not identify highly uncertain, unique or unknown risks. The possible effects on the human environment are not highly uncertain nor do they involve unique or uncertain risks. The technical analyses conducted for determinations of the impacts to the resources are supportable with use of accepted techniques, reliable data, and professional judgment. Impacts are within the limits that are considered thresholds of concern. Therefore, I conclude that there are no highly uncertain, unique, or unknown risks.

(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

This project is not setting a precedent for future actions with significant effects. The management practices proposed are compatible with the Forest Plan, and with the needs of the Forest Service, adjacent private landowners, and the public. This action does not represent a decision in principle about a future consideration.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

The EA includes all connected, cumulative, and similar actions in the scope of the analysis. The cumulative effects of past, present, and reasonably foreseeable actions are considered and disclosed in the EA, Chapter 4.

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

There are no features in the area affected that are listed or are being considered for listing on the National Register of Historic Places. A cultural resource inventory has been completed in the area, and all known cultural resources are protected (EA, Chapter 3). The potential for impacting undiscovered sites is mitigated by compliance with Forest Plan standards and guidelines, and through the use of standard timber sale contract clauses.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

This project was determined to have no effect on any threatened or endangered species. The effects on individual species are discussed in Chapter 4, pages 39-44.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The action does not violate any Federal, State or local laws or permits imposed for the protection of the environment. Scoping and public comments have raised questions that warrant further clarification and discussion. Treatment of noxious weeds will be implemented on a site specific basis according to the Forest Plan Amendment 11 and in accordance with all product label directions. Districts will be required to submit proposed project information to the Forest Fisheries Biologist for completing Biological Assessments each year at least 60 days prior to herbicide application. **Required information will include:** project location map, acres to be

sprayed by 6th code HUC, chemical to be used, application rate, equipment, and any special circumstances.

Implementation Date

If no appeal is received, implementation of this decision may occur on, but not before, five business days from the close of the appeal filing period. If an appeal is received, implementation may not occur for 15 business days following the date of appeal disposition (36 CFR 215.9).

Administrative Review or Appeal Opportunities

This decision is subject to administrative review (appeal) pursuant to 36 CFR Part 215. The appeal must be filed (regular mail, fax, email, hand-delivery, or express delivery) with the Appeal Deciding Officer. The Forest Supervisor at the Lolo National Forest is the Appeal Deciding Officer; however appeals are to be sent to the Regional Office. You may submit appeals to: Appeal Deciding Officer, USDA Forest Service, Northern Region, P. O. Box 7669, Missoula, MT 59807; by FAX at: (406) 329-3411; or by Email at: appeals-northern-regional-office@fs.fed.us. The acceptable formats for submitting an electronic appeal are: MS Word, Word Perfect, or RTF. Please type "Upper Lolo Watershed Restoration EA" in the Email subject line. Hand-delivered appeals will be accepted at the Regional Forester's Office, 200 E. Broadway, Missoula, MT, between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday. The appeal must have an identifiable name attached or verification of identity will be required. A scanned signature may serve as verification on electronic appeals.

Appeals, including attachments, must be filed within 45 days beginning the day following the publication date of legal notice in the *Missoulian*, the newspaper of record for the Lolo National Forest. The publication date in the newspaper of record is the exclusive means for calculating the time to file an appeal. Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source. Individuals or organizations who submitted substantive comments during the comment period specified at 215.6 may appeal this decision. The notice of appeal must meet the appeal content requirements of 36 CFR 215.14.

Contact Person

For additional information concerning this decision or the Forest Service appeal process, contact Don Stadler, NEPA Coordinator, Missoula Ranger District, Building 24 Fort Missoula, Missoula, MT 59802, Telephone Number (406) 329-3814.

/s/ Maggie Pittman

MAGGIE PITTMAN

Missoula District Ranger

Lolo National Forest

November 16,2005

Date

APPENDIX A - Response to Comments

Comments are arranged based on the date they were received. The Missoula Ranger District wishes to thank all of those who responded with comments regarding this project proposal.

Comment Letter 1, Wildlands CPR

Comment 1-1: “Wildlands CPR would like to see the Forest Service define what they mean by “future access needs” within the EA, instead of referring the reader to another document. We believe that much of this need is future timber access and that perhaps that is overriding true watershed restoration needs and priorities. Further, there is no mention of Plum Creek roads, which have a huge impact on the analysis area.”

FS Response 1-1: Future access needs may include administrative access such as fire suppression, road maintenance, timber harvesting, weed spraying, and other land management activities. Access needs also include public access for recreational purposes and access to private land adjacent to forest lands. Plum Creek roads are known to impact the planning area due to the intermingled ownership pattern in the watershed. The Forest Service has responsibility for management of roads on public land. Conducting inventory or suggesting management actions on private roads is not within the scope of the Agency’s authority.

Comment 1-2: “The end result of the project work, according to the Draft EA, is a reduction in road density from 3.9 to 2.8mi/mi². This is significant, and will no doubt produce benefits to the watershed, but we would still like to see the Forest Service work towards reducing the density down to 1 mile/mile². If this is impossible because many roads in the watershed belong to Plum Creek or are cost share roads, then we would like to see that issue addressed in the EA.”

FS Response 1-2: Chapter 2, page 11 of the EA gives a discussion of why a lower road density was not adopted; “*Many of the roads administered by the forest provide access to private land. The FS is required by law to provide access to private holdings. Many of the roads in the project area are under cost share agreements with PCTC. The agreements preclude the forest from closing these roads. Fire fighting, recreation, and vegetation management require road access. If the forest adopted a goal of reducing road density to 1.5 miles per square mile it would not be acceptable for administrative and public access.*”

Comment 1-3: In terms of revegetation, all that is mentioned is seeding and fertilizing. On a field trip with the Forest Service to look at several of the proposed road decommissioning sites, Mark Vander Meer with watershed consulting described several revegetation techniques which we would like to see employed on this project, including using native plants and clumps of soil from the site, as well as using a seed mix that does not include aggressive, long lived non-natives.”

FS Response 1-3: Chapter 2, page 12 of the EA states that “*Seeding and fertilizing may not be necessary in a forested environment, and will be considered on a site specific basis.*” This statement is in response to Mr. Vander Meer’s suggestions for revegetation techniques. The forest will consider using adaptive techniques depending on the conditions of the specific site being considered. Attention will be paid to the amount of native plant material available on site for transplanting, the amount of noxious weeds currently present and shading and soil conditions which may affect reestablishment of desirable vegetation.

Comment 1-4: “Page 10 of the Draft EA discusses the impacts of road closures on motorized access. Wildlands CPR encourages the Forest Service to not allow these roads to become access points for motorized recreation. Further, the road closures will hopefully benefit hunters, anglers, and other forms of non-motorized recreation in the region. These types of recreation were not addressed in the Draft EA.”

FS Response 1-4: During implementation of road closures, mitigation techniques are applied to minimize the potential for creating opportunities for non-authorized motorized access. Mitigation often includes placing physical barriers (such as boulders, earth barriers, or gates) at the intersections of treated roads. Deep ripping of road surfaces will also make motorized wheeled access more difficult, but may not necessarily preclude snowmobile travel in the short term. In the long term, revegetation of treated roads with shrubs and trees will likely exclude all motorized access. Non-motorized recreation in the region will probably be enhanced by implementation of this project. The EA generally seeks to disclose potential effects for recreation issues developed during scoping. No scoping comments were received by non-motorized recreational users; consequently, this was not developed as an issue for this project.

Comment 1-5: “Is there a timeline for completing this work? And is there a monitoring program established to measure the success of the project?”

FS Response 1-5: No timeline has been specifically associated with the completion of this project. Implementation will occur as funding becomes available. A monitoring program has not been established.

Comment Letter 2, Lolo Watershed Group

Comment 2-1: “The Draft EA should have included a table or glossary to explain the terms on page 1 of Chapter 1. The terms are “Permanently closing and reclaiming,” “Decommissioning,” and “Reclaim.” What do these terms mean, and /or what is the difference between them? The same goes for the term “obliterated” on p.2.”

FS Response 2-1: We agree that these terms should be explained. We have added the definitions on pages 1 and 2 of the EA.

Comment 2-2: “Another issue of concern is the decision to not close any cost share roads. We understand the complexity involved with these cost-shared roads due to the checkerboard ownership of these lands. However, many of these roads pose the highest risk for sedimentation due to their oftentimes-parallel juxtaposition and close proximity to streams, and their high level of usage (examples are the arterials along every drainage in the Upper Lolo watershed). Therefore, perhaps the assessment should identify these forested sections of land as high priority areas for future land swaps or procurement so sediment reduction within these affected stream channels could occur in the future.”

FS Response 2-2: Closure of cost share roads is not possible at this time due to the access they provide to private land, and the parties to the cost share agreement with the Forest Service are essentially part owners of the roads. Sedimentation from many of these roads will be mitigated by the application of BMPs under this proposal. The acquisition of additional lands is beyond the scope and temporal duration of this decision.

Comment Letter 3, Arthur F. Gidel

Comment 3-1: “The Proposed Action includes only one alternative other than the No Action Alternative. For example, the decommissioning/obliteration of jammer roads makes sense to me as do the BMPs for major roads and culvert replacement. But I do not like some of the other road decommissioning proposals. I do not find it acceptable to reduce road miles generally for motorized recreation. In particular, I believe I frequently use Road 17988 in section 34 during the winter. As near as I can tell, I have also used roads 17173 and 33682 near Granite Pass during the winter.”

FS Response 3-1: Under the current Action alternative, authorized recreational road access would not be significantly reduced. Most of the roads proposed for closure are currently impassible, or are closed except for administrative access. Road 17988 is currently restricted to public use, except snowmobiles are only restricted from October 15 to December 1. This road is proposed for level 3-D decommissioning, and is about ½ mile in length. 3-D decommissioning involves placing a physical barrier at the road intersection (recontour prism for 50-100 feet, earthen barrier, boulders, etc.) and ripping the road surface. These actions would make the road more difficult for snowmobile use, but would not necessarily be sufficient to physically eliminate snowmobile traffic in the short term. Long term access would become difficult as the road prism revegetates after ripping. Road 17173 is a jammer road which is also close to ½ mile in length, and is proposed for recontouring. Recontouring the road prism would eliminate administrative and recreational access on this road.

Comment 3-2: “I would be more supportive if alternative roads that are not scheduled for decommissioning but are currently closed to motorized use were opened to maintain (or increase) motorized opportunities at current levels....I do not see any options that propose conversion of roads into trails for some limited/appropriate motorized use, instead of complete decommissioning. Examples would be access to wheeled vehicles less than a certain width or to two-wheeled vehicles. Such trails can use, for example, aggressive dirt water bars to control sediment.”

FS Response 3-2: Opening more roads or converting roads to trails for motorized use does not meet the stated purpose and need of this project. Opening new areas to wheeled motorized use can increase surface erosion due to rutting and subsequent channeling of overland flow. Erosion control devices, such as aggressive dirt water bars or other structures need periodic maintenance to ensure their continued functionality, which would incur additional cost to the government. Noxious weeds are often more widely spread by motorized users, as the vehicles are capable of covering more area in a day than non-motorized recreationists. Management of 78 percent of roads in the project area will remain unchanged, and available for currently authorized motorized recreational uses.

Comment 3-3: “In addition, the analysis does not seem comprehensive enough in certain respects. For example, noxious weed management should be integral to the decision process, as does consideration of paving on high use main roads. The Draft EA states that paved roads may have adverse impacts on fish populations but there is no discussion as to why this occurs. Isn't the dust from dirt roads along streams an issue for fish?”

FS Response 3-3: Noxious weed treatment will be addressed on a site specific basis according to Amendment 11 of the Lolo National Forest Plan, and applications will follow all product label directions. The brief discussion in the EA of the effects of paving on fish populations was to address a comment letter received by the Montana Fish, Wildlife, and Parks. Paving of forest

roads was not considered in this project, as forest roads generally do not require a paved surface to accommodate the administrative or recreational use of the road, and sediment that may affect fish populations can usually be effectively controlled by the application of BMP upgrades.

Comment 3-4: “Finally, the public participant list appears slanted towards special interest groups, especially extreme environmental interest groups. I see few if any typical users of the area who are not representing an organization or are a resource specialist. Public participation should include individual users with diversity similar to that of actual users. In particular, I do not see any advocated for wheeled motorized use on the list of public participants.”

FS Response 3-4: Public participation from all interested parties is encouraged and requested through the scoping process. The level of interest of a particular group or individual will determine the level of their participation. The members of the public listed as participants in the planning of this project have expressed particular interest in the Upper Lolo Watershed, and specifically requested to participate in the planning of this project. Any member of the public, whether they are affiliated with a special interest group or are interested individuals may participate in the NEPA process. In addition to environmental groups, comments were received from and field tours were conducted with motorized users from the Missoula Snowgoers, a local snowmobile club.

Comment Letter 4, Vicki and Bud Moore

Comment 4-1: “I recently participated in a field trip in the area concerned by the Lolo Forests road management areas and I would just like to express my support for the project. Upper Lolo Creek is a very important watershed area and will become even more critical as subdivisions and development occur on the lower reaches of the watershed. I fully support you on your road closures and BMPs.”

“I would just like to add that the work you have already done and will be doing in the future MUST be accompanied by solid noxious weed control action: I understood that to be the case during the field trip.”

FS Response 4-1: Noxious weed treatment in the project area will be conducted on a site specific basis according to Amendment 11 of the Lolo National Forest Plan, and applications will follow all product label directions.

Comment Letter 5, National Forest Protection Alliance, Native Forest Network, Ecology Center

Comment 5-1: “Unfortunately, the Draft EA does not divulge the underlying reason for closing and upgrading roads in the Upper Lolo Creek watershed, i.e. the retention of roads in the system that could be used for accessing logging activity in the next 20 years.”

FS Response 5-1: There are currently no plans to harvest commercial timber within the project area. Chapter 1 page 6 states “*Future analysis is likely to include timber harvesting and vegetative rehabilitation.*” However, that analysis is not part of this decision. Future access needs are discussed in Response 1-1.

Comment 5-2: “We suggest a goal of 1.5 miles/mi² of remaining improved roads, which we realize may seem unrealistic (given a required reduction of 193 miles or 96% of the FS inventory in the project area) yet would provide far more meaningful protection.”

FS Response 5-2: Please see response 1-2.

Comment 5-3: “The Draft EA should have included a table or glossary to explain the terms on page 1 of Chapter 1. The terms are “Permanently closing and reclaiming,” “Decommissioning,” and “Reclaim.” What do these terms mean, and/or what is the difference between them? The same goes for the term “obliterated” on p.2.”

FS Response 5-3: Please refer to Response 2-1.

Comment Letter 6, Montana Fish, Wildlife, and Parks

Comment 6-1: “This general area does not have much cover, and the high number of roads offers poor security for big game during hunting season. We believe that the road closures proposed in this EA would benefit big game, particularly elk. We also believe this proposal is a positive step for the fisheries of Lolo Creek, by reducing road sediment delivery into streams and enabling fish passage.”

FS Response 6-1: Thank you for your comments.

Comment Letter 7, Sierra Club

Comment 7-1: “First, it appears that the priority for road decommissioning emphasized future timber access. If this is truly a watershed restoration project then any work should favor that goal first and foremost.”

FS Response 7-1: Future access needs are explained in Response 1-1. Watershed restoration is the priority of this project; however, we must create a project that will be implementable under current constraints, including road access to private land and future land management activities on public land.

Comment 7-2: “According to the draft EA, a reduction in road density from 3.9 to 2.8 miles/mile² is the goal. Though this is significant, with measurable benefits to the watershed, we still urge the Forest Service to work towards reducing the density down to 1 mile/mile².”

FS Response 7-2: Please refer to Response 1-2.

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Comment 8-1: “Table 4-1 in the Draft EA shows a reduction in total road density from 5.60 to 4.38 miles/sq. mile. This is significant, and no doubt will produce benefits to the watershed, but we would still like to see the Forest Service work towards reducing the density down to 1 mile/sq. mile.”

FS Response 8-1: Please refer to Response 1-2.

Comment 8-2: “Regarding revegetation, all that is mentioned is seeding and fertilizing. American Wildlands is aware that Mark Vander Meer with Watershed Consulting and Sungnome Madrone with Redwood Community Action Agency have consulted with the Forest Service on various revegetation techniques. Why are these not included in the Draft EA? There are studies that indicate that fertilizing may actually aid invasive plants.”

FS Response 8-2: Please refer to response 1-3.

Comment 8-3: “Page 10 of the Draft EA discusses the impacts of road closures on motorized access. American Wildlands encourages the Forest Service to not allow these roads to remain access points for motorized recreation. Further, the road closures will hopefully benefit hunters, anglers, and other forms of non-motorized recreation in the region. These types of recreation are not addressed in the Draft EA.

There is no timeline for any of the work and there is no mention of monitoring-both are important components”

FS Response 8-3: Please refer to Response 1-4 and 1-5.

Comment 8-4: “In some regions, roads along or through elk migration corridors are the most critical roads. Road closure proposals should be assessed on site-specific bases to determine the limiting habitat conditions in each area.

Because these gates are so often ineffective, and because closed (but not decommissioned) roads can also cause severe hydrological impacts, land managers should consider fully decommissioning roads rather than simply gating them.”

FS Response 8-4: The transportation analysis that was developed for this project included collaboration with the Lolo National Forest’s Wildlife Biologist, Hydrologists, Fisheries Biologists, District Silviculturist, Recreation Specialist, and Transportation Planner. This integrated approach allows the Forest Service to develop plans that meet a variety of resource needs. In addition to resource and human use criteria, the Forest Service must also consider the economic factors associated with implementing proposed plans. The decision to gate or decommission a road is based on balancing resource, human, and economic criteria.