

Consideration of Comments for Canyon Lake Dam Access for Repairs

The comment period for the Canyon Lake Dam Access for Repair project started on 12/07/2018 and again on 02/20/2019 (due to government shutdown during the first comment period). The Responsible Official requested comments back within 30 calendar days. While comments may be submitted at any time, for the purposes of this comment period, comments were accepted through 01/07/2019 and 03/22/2019. Twelve individuals or groups submitted comments during these comment periods. The majority of the letters were supportive of the project as proposed.

This appendix does not include every singular comment received on the Environmental Assessment (EA). Rather, it includes comments received from multiple commenters around a common subject. 40 CFR 1503.4(a) Response to comments refers to final environmental impact statements, and is not applicable to environmental assessments. The analysis for this project is documented in EA, and is subject to the Project-Level Predecisional Administrative Review Process (36 CFR 218). 218.25(b)(1) states, “The responsible official shall consider all written comments submitted in compliance with paragraph (a) of this section.” and (2)” (2) All written comments received by the responsible official shall be placed in the project file and shall become a matter of public record.”

Table 1: Parties responding to the comment period on the EA

Name	Acronym	Project File Document Name
Bob Miller	BM1	COMMENT-001
Mike Jeffords	MJ	COMMENT-002
Gary Macfarlane, Wilderness Watch	WW1	COMMENT-003 and COMMENT-011
Stan Kastens, Big Creek Lakes Reservoir Association	BCLRA	COMMENT-004
J. Randolph and Jane Alford	JR/JA	COMMENT-006
John Ormiston, Canyon Creek Irrigation District	CCID	COMMENT-007
Bob McKee	BM2	COMMENT-008
Ravalli County Board of Commissioners	RCC	COMMENT-009
Michael Pepion	MP	COMMENT-010
Tex Marsolek	TM	COMMENT-012
Shirley Sorenson	SS	COMMENT-013

Comment Analysis & Response

Comments were reviewed to determine if issues or concerns were raised that demonstrated a clear cause-effect relationship and if remedies were suggested that would address the issue/concern. Issues raised by multiple parties are listed once.

Table 2: Comment Analysis & Response

ISSUE/CONCERN (PARTY/IES ACRONYM)	RECOMMENDATION/ SUGGESTED REMEDY	RESPONSE	REMARKS AND/OR PROJECT RECORD CITATIONS
Dam Repairs			
Not allowing repairs would lead to failure in the future. Dam failure could lead to devastating effects to the environment and private property downstream (BM1, MJ, TM)		Comment considered but no changes needed	
Use of primitive equipment at the site would preclude use of the storage capacity of the dam for at least one, and probably two, irrigation seasons (CCID)		Comment considered but no changes needed	
The Forest Service should fully analyze a non-motorize, non-mechanized alternative. (WW)		Comment considered but no changes needed	The EA discusses on p. 9 why an alternative that uses only traditional skills was not analyzed in detail.
The project as proposed violates the Wilderness Act. (WW)		Comment considered but no changes needed	The EA discusses on pp. 5-7 the dam easement and Wilderness Act.

Appendix A – Consideration of Comments

ISSUE/CONCERN (PARTY/IES ACRONYM)	RECOMMENDATION/ SUGGESTED REMEDY	RESPONSE	REMARKS AND/OR PROJECT RECORD CITATIONS
Cannot fully comment without knowing the full proposal of work to be done by the Dam owners (WW)		Comment considered but no changes needed	Appendix B to the EA describes the work proposed to be done by CCID. This project proposes to authorize CCID motorized access to their valid, existing easement. Pages 3-4 of the EA describes the need for action. It should be noted, that the Forest Service cannot decide for CCID which methods shall be used to ensure a safely rehabilitated dam. The responsibility for dam safety lies solely with CCID. The authorities through which the U.S. Forest Service regulates safety of dams on National Forest System lands do not apply to dams authorized by a pre-Federal Land Policy Management Act right-of-way or to congressionally withdrawn water projects.
Trail Conditions/Animal Packing			
Trail conditions are not suitable for pack/stock animals (BM2, CCID)		Comment considered but no changes needed	
Improve trail leading to this location for future dam maintenance and repair (MP, WW).		Comment considered but no changes needed	
It is not unreasonable to consider relocating the trail to improve access for pack/stock animals. This would better protect wilderness character. (WW)		Comment considered but no changes needed	It is not feasible or reasonable to the liner into smaller pieces to accommodate transport by stock on this hazardous trail. In addition all the seams would have to be welded with a specialized piece of equipment and generator, which is not feasible to transport by stock.
Past Dam Repairs/Rehabilitation			

Appendix A – Consideration of Comments

ISSUE/CONCERN (PARTY/IES ACRONYM)	RECOMMENDATION/ SUGGESTED REMEDY	RESPONSE	REMARKS AND/OR PROJECT RECORD CITATIONS
Canyon Dam has needed repairs in recent past. How can FS ensure another repair will not be necessary in the future? (WW)		Comment considered but no changes needed	The rehabilitation project will correct deficiencies that have resulted in significant seepage through the dam embankment, which have been documented and monitored by Hydrometrics Inc. over the past several years during routine safety inspections. In the past 12 years, three sinkholes have been repaired. Silty sand embankment soils are prone to piping (internal erosion). Localized piping and high seepage velocities can lead to development of more sinkholes and/or a total dam breach failure. The most recent sinkhole developed near the south abutment of the auxiliary spillway in 2017. In 2004, work was completed on the dam for the purpose of increasing inadequate spillway capacity, repairing failing outlet works, and addressing surface erosion problems along the upstream embankment. However, the work in past projects did not correct embankment stability problems and internal erosion or piping potential.
Emergency Status			
EA is misleading in calling the current repair work an emergency. (WW)		Factual corrections made	The EA was updated to remove any reference to emergency status of the repairs. The proposed action is not an emergency and we apologize for any confusion information the EA may have caused.
EA is insufficient			
Past dam repair projects were not properly evaluated and accounted for in cumulative effects analysis (WW)	Prepare an EIS	Comment considered but no changes needed	In order to have cumulative effects, the effects must overlap in space and time. The analysis in the EA did not find any significant impacts related to the proposed action, therefore, and EIS is not warranted at this time.

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ISSUE/CONCERN (PARTY/IES ACRONYM)	RECOMMENDATION/ SUGGESTED REMEDY	RESPONSE	REMARKS AND/OR PROJECT RECORD CITATIONS
Environmental analysis should evaluate the easements associated with Canyon Dam		Comment considered but no changes needed	This is outside the scope of this project.