

Appendix A - Response to Comments

Comments	Responses to Comments
<p>Comment 1-1. The only concerns that I have are how culverts will be removed, road crossing will be returned to a natural state, and road surfaces will be reclaimed and contoured if necessary. As indicated in the EA these issues will be address at a later date through the SPA 124 permit process. It should be noted that time restrictions may be imposed to reduce impacts to fish and the stream during run off, spawning, and out migration of fry.</p>	<p>The mitigation section in the EA on pages 2-4 and 2-5 explains the mitigation that would be employed to minimize sediment and to restore the channel sections after culvert removal. The Gallatin NF has removed hundreds of culverts the last 10 years with excellent results in water quality protection and stream channel restoration. The Gallatin NF is coordinating with the Montana DFWP on the 124 permit and provisions.</p>
<p>Comment 2-1. The EA states the project is scheduled to begin in the summer of 2006. However, we are concerned that activity in the project area during the summer months would adversely impacts fish eggs and fish populations as increased sedimentation will likely cause fish eggs to become covered and smothered. We encourage the Forest Service to conducted the project later in the year, perhaps later in the summer or during the early fall, after fish eggs have hatched.</p>	<p>As indicated in the response to comment 1-1, the Montana DFWP is coordinating the culvert removal with the Gallatin NF via the 124 permit process. See response to comment 1-1 and in the EA Chapter 2.9, #2 which lists the provisions of the 124 permit and EA pages 3-4 and 3-11 through 15, sediment impacts from culvert removal and other road decommissioning activities pose minor and very temporary impacts. The two main periods of concern for fish is the spawning period (which occur prior to project initiation), and fry emergence which is mainly during the July 15 through August 15 period. The 124 permit provisions would exclude culvert removal for the perennial stream culverts during the July 15 to August 15 time period.</p>
<p>Comment 3-1. I am very concerned that this project (Bangtail EA) is being rushed through the analysis and is driven by funding availability as opposed to whether or not the project makes scientific sense and fits in with the Travel Plan which is</p>	<p>As stated in the Purpose of and Need for Action in Chapter 1.2 of the EA one reason the Forest is proposing this work in 2006 is "...because dollars are available this year to complete the work." However, Chapter 1.2 also describes many of the effects of roads documented in scientific literature including such things as the disruption of the hydrologic function of watersheds by the interception of surface and subsurface water flows. However, the EA did not have a literature citation for this statement. Therefore, we added an additional reference in the EA for those persons needing more information on the effects of roads (Forman and Sperling et.al. 2003) There is much science behind our need to reduce the density of roads in these watersheds. While it is true we are trying to</p>

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<p>currently under evaluation.</p>	<p>accomplish this work this summer, we feel our analysis provided in Chapter 3.0 documents the scientific basis for implementing this project. For example, Table 3.4 list the miles of road per square mile of land area in each 6th order hydrologic unit. These are high densities of road and have caused more sedimentation to occur than streams in the area are able to process (Furniss et. al. 1991).</p> <p>The Gallatin NF has intended to decommission the excess roads in the Bangtails since at least the mid-1990's, in fact it was specifically endorsed in the BSL exchange environmental analysis (1998). The project is also an integral part of the pending Shields River Total Maximum Daily Load levels being finalized by Montana DEQ. Decommissioning would resolve the fisheries and sediment issues in Bangtail and Willow Creeks thereby attaining Clean Water Act compliance in those drainages.</p>
<p>Comment 3-2. The final travel management plan has not been issued for the Gallatin national Forest, so it is presumptuous of the Bangtail EA to assume that the roads will not be part of the travel system when that decision has not been made.</p>	<p>The planning for this Bangtail road decommissioning project has been very carefully coordinated with the Gallatin NF travel planning process to ensure that no conflicts occur with any of the Travel Plan alternatives. After four years, the Travel Planning process is nearing completion with the final EIS due out this fall. It has included an ambitious public involvement process that has generated over 18,000 comments. There are seven alternatives evaluated in detail in the Travel Plan EIS. Motorized use is being emphasized in the Bangtail Travel Planning Area. Local motorized user groups helped identify and evaluate the potential locations for open roads and trails in the Bangtails. None of the roads proposed for decommissioning are being considered for motorized use in any of the seven alternatives. All of the roads to be decommissioned are either undesignated or project "green" roads on the Travel Plan maps. All of these roads are excess to any of the Travel Plan needs, even the no-action Alternative 1.</p> <p>The District met with two representatives from local motorized user groups prior to this project being proposed to the public. While they had concerns about the timing of the project they supported the decommissioning of the roads. Constructing any of the proposed motorized trails in the upcoming Travel Plan is predicated on first completing some decommissioning in order to comply with sediment standards.</p> <p>The Bangtails TPA does not currently comply with Forest Plan Standards and the Clean Water Act. Sediment levels need to be reduced via excess road decommissioning prior to implementing any of the Alternatives in the Travel Plan. In actuality, the preferred alternative for the travel plan, Alternative 7-M, will involve construction of new ATV route connectors designed to enhance motorized loop routes and opportunities in the Bangtails. Decommissioning roads would reduce sediment levels sufficiently so that these new ATV trails connectors can be constructed within Gallatin NF sediment standards. Refer to the Draft Gallatin NF Travel Plan EIS for further clarification at http://www.fs.fed.us/r1/gallatin/</p>
<p>Comment 3-3. The stated goal of the Bangtail is to reduce sediment to the creeks and stream, yet on page</p>	<p>One objective of decommissioning a road is to remove vehicle use. Vehicles contribute to erosion through the loss of road surface material as dust and the erosion of the road surface during precipitation and run-off events. Vehicle use also causes the need for periodic maintenance for public safety and maintenance of drainage</p>

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<p>2-3 the main goal stated is to “block roadways to vehicles” and is mentioned 4 times in the 9 bullets points. Review of the Appendix 2 shows that the work is geared to closure of the roads to motorized traffic and not to reduction of sediment load by addressing specific problems that are creating the sediment load.</p>	<p>structures. Periodic maintenance requires that the roads be graded, vegetation growth controlled, culverts and ditches cleaned, etc. While all these measures are necessary for maintenance they also keep the road in a disturbed condition that does not allow vegetation to establish on the road. This contributes to surface compaction that disrupts surface and shallow subsurface water flows and removes vegetation that would otherwise help filter sediment. While Appendix 2 contains measures that that would effectively stop vehicle use it also contains measures that reduce erosion such as the construction of erosion ditches, placement of slash on road surfaces, ripping roads surfaces, reseeding, and the removal of culverts.</p> <p>One of the goals of the project is to reduce sediment levels in order to comply with Gallatin NF sediment standards and achieve Clean Water Act compliance as described above. The “...block roadways to vehicles.” activities on page 2-3 are among the activities which would be used to achieve the sediment reduction objective. During the last 20 years, the Gallatin NF, in watershed rehabilitation-road decommissioning projects, has been able to reduce sediment impacts on a number of road segments by merely removing vehicular traffic. This has frequently occurred on timber sale roads no longer needed for the timber sale which after several years of non-use have revegetated with grass, forbs, and tree seedling/saplings. Some examples are parts of the upper Shields River and upper South Fork of Cache Creek (Gallatin River drainage). Frequently decommissioning of these roads does not require ripping/seeding/slashing but may require culvert removal, waterbar installation and blocking the roads to motorized use. This is true of many of the Bangtail roads to be decommissioned which would require minor ripping, some culvert removal, and blocking from open routes.</p>
<p>Comment 3-4. A better and more cost effective approach would be to have a geological engineer or civil engineer review the roads on the ground with the hydrologist to locate problem areas (if any) and then develop a specific mitigation plant to address the problem areas.</p>	<p>Gallatin NF staff, including the Forest Hydrologist, several Hydrology Technicians, a Civil Engineer, Engineering Technicians, a Range Conservationist, Foresters, and Fishery Biologists, reviewed Bangtail roads on numerous occasions over the last decade (Project File, Wildlife and Hydrology). Many specific treatment areas have been identified which are direct sediment sources to perennial streams. In addition many “upland” road segments have been identified for treatment which are sediment sources to intermittent streams and 1st order channels. This project proposal incorporates these mitigation plans.</p> <p>To further review this question, we reconvened the Project Interdisciplinary Team (ID Team) to discuss the potential for other alternatives (Project File, IDT Notes). The ID Team reviewed other ways to reduce sediment from roads. For example, gravel could be placed on certain roads and road segments, culverts could be installed that are larger, and more gating could be put in to regulate traffic during wet seasons. Also, there are examples where roads or segments of road were paved to reduce sediment from roads are to try and prevent erosion or mass failures of roads. However, the bottom line is that more roads exist than we need to manage the resources, provide public access and the Forest Service does not have the financial resources or the need to keep these roads in serviceable condition. Based on these facts it didn’t make sense to the ID Team to pursue these expensive options to maintain additional miles of unneeded road. However, many of these mitigations would be implemented as standard maintenance procedures on the remaining roads.</p>
<p>Comment 3-5. It appears that the</p>	<p>The sediment load estimations are reduced by a “routing” coefficient based on the size of a watershed.</p>

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<p>sediment load estimations and calculations for “Existing Sediment % over natural” in Table 3.2 on page 3-3 are incorrect. Utilizing the “baseline sediment yield of 40 ton/mi²/yr” based on measurements in Stone Creek this would predict a “Natural” sediment load of 270 ton/year for Bangtail Creek while the R1R2 model predicts 318 ton/years. The predicted amount is only 17.8% over the natural load and is well below the 30% permitted for a Category A stream. The calculation for Bangtail is (4323 acre/640acres/mi²)*40tons/mi²/year =270 ton/year. The calculations appear to be off for Jackson Creek, Perkins Creek and Willow Creek as well.</p>	<p>The routing coefficient is basically an index of the efficiency of a stream to route sediment downstream. The larger the watershed the less efficient due to instream storage, and the smaller the routing coefficient. The sediment levels mentioned for Stone Creek are basic sediment levels before a routing coefficient is factored in. To give an example for Willow Creek the “natural” sediment yield used in the calculation is 40 tons/mi²/year but the routed sediment yield is 29 tons/mi²/year. The existing road sediment yield is estimated to be 18.0 tons/mi²/year which the routing coefficient reduces to 13.1 tons/mi²/year. The existing sediment % over natural is then 13.1/29 = 45%. The post treatment sediment yield for Willow Creek is estimated to be 8.5 tons/mi²/year which the routing coefficient reduces to 6.1 tons/mi²/year. The post treatment sediment % over natural is then 6.1/29 = 21%. The analysis for Jackson Creek and Perkins Creek calculate similarly with existing and post treatments sediment yields of 43%/25% and 30%/18% respectively. For Bangtail Creek the existing sediment yield should have been listed as 277 tons/yr and the post treatment as 239 ton/yr but the sediment % over natural figures are correct. The natural sediment yield in Bangtail Creek is calculated at 192.8 tons/yr (28.4 “routed” tons/mi² x 6.8 mile²) and existing road sediment at 83.9 tons/year for an existing sediment yield of 44% over natural. Post treatment sediment yield is calculated at 45.2 tons or a post treatment sediment yield of 23% over natural. Table 3.2 on page 3-13 of the EA was modified per comment 3-5 to include updated figures for Bangtail Creek and a new column 4 for natural sediment yields.</p> <table border="1" data-bbox="554 886 1898 1295"> <thead> <tr> <th>drainage</th> <th>HUC 6 acres to Forest boundary</th> <th>existing road miles</th> <th>natural sediment tons/year</th> <th>existing sediment tons/year</th> <th>existing sediment %>natural</th> <th>post treatment road miles</th> <th>post treatment sediment tons/year</th> <th>post treatment sediment %>natural</th> </tr> </thead> <tbody> <tr> <td>Bangtail Creek</td> <td>4323</td> <td>37.3</td> <td>193</td> <td>277</td> <td>44</td> <td>20.1</td> <td>234</td> <td>23</td> </tr> <tr> <td>Jackson Creek</td> <td>2882</td> <td>24.5</td> <td>137</td> <td>196</td> <td>43</td> <td>14.2</td> <td>171</td> <td>25</td> </tr> <tr> <td>Perkins Creek</td> <td>972</td> <td>5.8</td> <td>56</td> <td>72</td> <td>30</td> <td>3.4</td> <td>65</td> <td>18</td> </tr> <tr> <td>Willow Creek</td> <td>3814</td> <td>34.1</td> <td>174</td> <td>253</td> <td>45</td> <td>16.0</td> <td>210</td> <td>21</td> </tr> </tbody> </table>									drainage	HUC 6 acres to Forest boundary	existing road miles	natural sediment tons/year	existing sediment tons/year	existing sediment %>natural	post treatment road miles	post treatment sediment tons/year	post treatment sediment %>natural	Bangtail Creek	4323	37.3	193	277	44	20.1	234	23	Jackson Creek	2882	24.5	137	196	43	14.2	171	25	Perkins Creek	972	5.8	56	72	30	3.4	65	18	Willow Creek	3814	34.1	174	253	45	16.0	210	21
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<p>Comment 3-6. If the sole purpose for the Bangtail EA is sediment reduction to meet the requirements for a “Category A” stream and the streams are currently in compliance</p>	<p>As explained in the response to comment 3-5, the existing sediment level estimates for the % over natural in Bangtail, Jackson, Perkins, and Willow Creeks are correct. Bangtail Creek and Willow Creek (at 44% and 45% over natural) are not in compliance with the Category A standard of 30% over natural.</p>																																																					

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then the road decommissioning is not required.	
<p>Comment 3-7. Actual measurements of the sediment load and annual sedimentation should be made in each creek to determine how well the model mimics real life. How does the model account for the type of bedrock geology, slope, aspect, type of soil development?</p>	<p>The sediment model coefficients are based on actual sediment data from the Gallatin NF from the early 1970’s through 2000. The most relevant data to the Bangtails is from Stone Creek which was used as a model calibration site in the 1980’s to early 1990’s. The model has been validated with sediment modeling in the Mill Creek system (south of Livingston) and Taylor Fork system (in Gallatin Canyon) with actual sediment measurements around 15% of modeled sediment (Project File, Correspondence). As the EA explains, however, in any year sediment levels can vary widely based on climatic variation and the best use of the model is for alternative comparisons. The model calibrations for the Gallatin NF were stratified based on parent material and then further stratified based on landtypes from the Gallatin NF soil survey which accounts for slope, and soils. The model does not directly account for aspect. Model comparison with actual data is only possible in a few watersheds since data collection requires multiple sediment and discharge measurements several times during a year.</p>
<p>Comment 3-8. Is this in a rain shadow or does it get excess rain/snow fall?</p>	<p>The Bangtail Range area gets average precipitation per elevation for the northern part of the Gallatin NF. Most of the rain shadow effects on the Gallatin NF are on the east side of the main mountain crests, notably the lower Gallatin Canyon (from the Madison Range) and Paradise Valley (from the Gallatin Range). A moderate rain shadow extends east from the Bridger Range, particularly the southern portion of the Bridgers but orographic lift of the Bangtail Range curtails the Bridger Range rain shadow. A slight rain shadow effect may occur on the eastside of the Bangtail Range divide but is moderated due to the relatively “low elevation” of the crest of the Bangtail Range, and relatively gentle slopes on both the west and east side.</p>
<p>Comment 3-9. Do you have actual precipitation measurement data for that area? I would like to get a digital copy of the R1R4 model to see the assumptions that are required to make it work.</p>	<p>Precipitation data for the actual project area is available. Precipitation studies were conducted in the area during the 1960 through 1970s. This is available from Montana State University (Weaver pers. con.) However, precipitation is not a direct variable in the R1R4 sediment model. The variable which would account for precipitation is the landtype (soil type) which occur at stratified elevation (and therefore) precipitation ranges.</p>
<p>Comment 3-10. Wildlife security is mentioned as an issue – how much wildlife has been run over and killed on the project roads? How many animals have been poached and is this greater or less than the average on the Gallatin Forest in other areas.</p>	<p>The Forest Service does not usually collect data on road-related wildlife mortality. Therefore, data is not available for how many wildlife have been killed, run over, or poached on these roads. However, road-related mortality is well documented in the scientific literature.</p> <p>Chapter 1.2 of the EA states “There are also many effects on wildlife related to such things as disturbance during breeding and rearing, increased vulnerability of wildlife during hunting season, and poaching. Roads are also documented to have substantial impacts to wildlife related to vehicle wildlife collisions.” It is estimated that one million vertebrates are killed each day by vehicles (Watson 2005). Also, in one example, a study documented by Bancroft (1990) in Arizona revealed that the illegal practice of road hunting is widespread and “Eleven of 19 archery elk and deer hunters and 41 of 53 firearms hunters committed violations by attempting illegal take after observing a decoy from their vehicle.” Forman and Sperling et. al. (2003) review several studies that document road-related wildlife mortality.</p>

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<p>Comment 3-11. Has the percentage of fines been measured in the creeks and is it above or below the “Allowable % fines less than 6.3 mm”. Can you provide a map showing the sample locations?</p>	<p>The percentage of fines has not been quantitatively sampled in some of the project area streams because walk-throughs of the stream showed direct sediment delivery and related stream habitat impacts from the roads proposed for treatment. In other words, sediment sampling wasn’t necessary to determine that mitigation is necessary, and, as noted in previous comments, this determination was jointly reached by representatives of multiple resource areas within the Forest Service quite some time ago. Similarly, Montana FW&Ps has asked the Forest Service to reduce road densities and address site-specific sediment delivery issues in the project streams based on their observations of the area. Most recently, these Montana FW&Ps comments are included in the project record of the Gallatin National Forest (GNF) Travel Plan DEIS. Additionally, Bangtail and North Fork Willow Creeks, habitat surveys have been conducted. These surveys include evaluations of surface fines made systematically over the length of stream surveyed (in both streams, these means the majority of fish-bearing stream with GNF boundaries). These evaluations of surface fines differ in methods, but have uniformly determined surface fines to be ‘moderate-to-high’ depending upon local site factors, and a potential factor limiting fish production.</p>
<p>Comment 3-12. What is the current density of fish by species in each creek and has the density increased or decreased in the last 10 or 20 years? Has drought affected the density? How many fish are killed by fishermen in these creeks annually?</p>	<p>It is the GNF’s responsibility to manage stream habitat, not fish populations, which are managed by Montana FW&Ps. Clearly, habitat management directly impacts fish populations, but fish populations are also influenced by many factors (e.g. disease) which may have no relationship to habitat quantity or quality. Consequently, Gallatin NF fishery personnel generally sample fish to determine fish species composition and other attributes to facilitate habitat management. Therefore, streams in the project area have been sampled sporadically in the last two decades, not frequently enough to determine population trend or to determine the impacts of drought in most cases. However, population estimates have been made recently in Bangtails and North Fork Willow Creeks because of concerns for the populations of sensitive Yellowstone cutthroat trout present in those streams. These density estimates are variable depending upon the location of stream sampled, but are considered moderate to low. For example, in North Fork Willow Creek, Yellowstone cutthroat densities have ranged from 12-40 fish/1000 feet of stream, both over time and within a given year; in Bangtail Creek, densities have been 45-100 fish/1000 feet (cutthroat and brook trout combined). Fishing in these streams is regulated by Montana FW&Ps, and estimates of fishing mortality do not exist for these small, headwater streams. However, it is reasonable to assume that fishing mortality is low in these streams for the following reasons: 1) most of the streams are reasonably remote and angler access is marginal; 2) the streams are small, support small populations of small fish, and angler use is thereby low (as evidenced by Montana FW&Ps angler use information); and 3) angler harvest is prohibited for the species of primary concern in project area streams, Yellowstone cutthroat trout, by regulation.</p>
<p>Comment 3-13. The EA states that motorized usage of these roads is low, if so, what is the reason for that? Are the roads gated? Are the roads left off the USFS trail map?</p>	<p>Use of the roads is low because most of the roads are dead end logging roads and don’t connect with any other roads or trails; so they don’t get much use. In many cases there are several roads accessing the same place and as one road became more commonly used the others got less use. They aren’t gated they just don’t access much.</p> <p>These roads are for the most part not on the current Forest Travel Map. The Gallatin NF acquired hundreds of miles of logging roads as a result of the BSL Land Exchange in 1998. These roads number far more than the GNF is budgeted to maintain, more than what needed to provide public access, more than what is needed for current</p>

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	logging system technology, and more than what is considered acceptable standards for managing sediment and maintenance of wildlife habitat. Forest Service policy is to maintain roads at a certain standard depending upon their level of use to provide for resource protection and public safety. Several of these newly acquired roads were not added to the Forest Travel Map since they were not intended to be part of the GNF travel system. Many of these roads are also not compatible with GNF construction/maintenance standards.
Comment 3-14. It seems like these roads represent a good opportunity for dispersed motorized recreational use.	Please refer to response to Comment 3-2. These roads were considered for use in the Travel Plan alternatives. Opportunities to use some of the acquired roads were taken advantage of and several have been incorporated into the Travel Plan Alternatives. The roads identified to be decommissioned do not provide a good opportunity for dispersed motorized recreation use since most are spurs associated with old timber harvest units. A review of comments submitted on the Forest Travel Plan Draft EIS indicates none of these roads were requested to be left open (Travel Plan DEIS Comments).
Comment 3-15. Recent studies show that there is a greater proportion of minorities getting involved in ORV's and motorized recreation, so reducing opportunities for motorized recreation had a disproportionate effect on minorities which is in contravention of Executive order 12898.	As explained in Comment 3-2, the Bangtails area has been selected as a motorized recreation emphasis area for the preferred Alternative 7M of the Gallatin Travel Plan. This project would enhance the motorized recreation opportunity by allowing compliance with sediment standards and construction of ATV connector trails to enhance motorized loop opportunities. These opportunities would be available to all motorized recreationists including minorities.
Comment 3-16. The fuel consumption estimate in section 3.8 page 3-17 should be revisited as the estimate seems low by an order of magnitude. How many trips are required by machine type and what is the hourly consumption rate? How many trips are required to mobilize and de-mobilize the equipment to and from various sties? How many administrative trips are required and how much fuel will be burned during those trips?	<p>The statement on page 3-17 of the EA that the project will consume “a few hundred gallons” of fuel was based on a rough estimate of the project. The small dozer/small excavator combination burns approximately an average of 2.0 gallons of diesel an hour since only 1 will be operating at a time. Assuming that 200 hours are needed for the project $200 \times 2.0 = 400$ gallons of diesel. Assuming 1 round trip move in: move out (flatbed trailer) of a total mileage of 440 miles $\times 5$ miles/gallon = 88 gallons of diesel. Operator support mileage is also estimated at 440 miles $\times 15$ miles/gallon = 29 gallons of gasoline. Contract administration is estimated at 2000 miles/18 miles/gallon = 111 gallons of gasoline. These estimates would total to 488 gallons of diesel and 140 gallons of gasoline or a total of 628 gallons of fuel.</p> <p>Disclosing an estimate of fuel consumption is required to provide the deciding official and the public an opportunity to determine if the amount of fuel consumed by this project could potentially cause and significant effect on the human environment. For example, if many thousands or even tens of thousands of gallons of fuel were to be consumed by a project when fuel was in short supply or if consuming this fuel may cause either large benefits or hardships on the local community then there could be the potential for a significant effect. However, this is not the case in the Bozeman and Livingston area.</p>
Comment 3-17. Review of the contact list gives the impression of	Fifty five individuals, special interest groups (including local motorized user groups) were sent a copy of the initial proposal (EA, Chapter 4.2). Those persons that expressed an interest in receiving a copy of the EA were sent one.

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<p>selected public distribution of the Bangtail EA for review and comments. It appears that the EA has not been sent to any Native American groups for comment, nor to any minority groups, nor to multiple use groups, nor to summer motorized recreational groups, nor to snowmobile associations (local or national), nor to logging or mining companies.</p>	<p>It is not our policy to send out the EA to everyone on the initial scoping list. EAs are sent to those persons that either commented during initial scoping or to those persons that want copies of all EAs related to certain topics. Several motorized use groups or advocates were contacted and provided the opportunity to comment during scoping and the 30 day comment period. Prior to the project proposal even being sent out to the public, the District met with representatives of motorized use to provide them with a heads up that we were considering road decommissioning. Also, the EA is available at the Gallatin Website to those with computer access. The Bozeman Daily Chronicle published legal notices of the initial project proposal and availability of the EA for comments. The offices of Congressman Dennis Rehberg and Senator Conrad Burns were also contacted along with the Gallatin County Commissioners. Minority contacts included three Native American tribes. R-Y Lumber in Livingston was contacted. No mining companies were contacted but mining in the area was not identified as a potential issue.</p> <p>Based on Table 3.4 in the EA, resulting miles of road if the project is fully implemented would be about 56 miles or 2.8 miles of road for every square mile of land area. Plus there would be an additional 14 miles of motorized trails. These roads densities are considered high by any natural resource maintenance standard and would provide ample opportunities for persons with disabilities to access the National Forest.</p>
<p>Comment 3-18. I am making a formal request for a revision to the Bangtail Environmental Assessment to incorporate additional analysis discussing the issues I have raised in my letter, as well as additional time for wider distribution of the proposal.</p>	<p>Fifty-five letters were sent out during the initial scoping period, a legal notice of scoping was published in the Bozeman Chronicle and a legal notice of the 30-day comment period was also published in the Bozeman Chronicle. Four letters were received during scoping and four comment letters were received from the 30 day comment period. This indicates a low level of controversy. It will be up to the deciding official to decide if additional analysis is needed and if the project should be delayed (see Deciding Official's decision in the Decision Notice).</p>
<p>Comment 4-1. We would like to see more recontouring. If recontouring work is not done the road will remain on the landscape for thousands of years.</p>	<p>Recontouring is very expensive. A Bureau of Land Management cost model estimates \$2.60 per lineal foot of road to recontour: $\\$2.60 \times 46 \text{ miles} = \\$ 631,488$ (project file, Economics). It is true that the road prism will remain on the landscape for a long time. Most of the roads traverse forest habitat and it is our hope that trees will become established in the decommissioned roadways and eventually the roads will be less visible.</p>
<p>Comment 4-2. Also, the sections of road that are not recontoured will continue to add sediment to the water and to be a draw for off-road vehicle drivers. The short distances of recontoured road will only appear as an extra challenge for an off-road</p>	<p>The prescribed work outlined on EA Chapter 2.8 is intended to put the roads to bed and minimizes road-related sediment. Some sediment could still occur even with the most thorough effort. It is likely some erosion may occur even on recontoured roads. The techniques to be used on the Bangtail project have proven to be effective on the Gallatin NF in re-establishing most of the hydrologic function of the roaded area and disconnecting the road prism from the stream system thereby eliminating the road prism as a sediment source. The project design includes debris placement on the road surface; short sections of recontouring, etc. to keep vehicles off the road.</p>

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driver.	
<p>Comment 4-3. ...this project is slated to be done over several years time. Over this time span personnel and priorities change. There needs to be a plan in place to guarantee continuity, funding and completion on this project as presented in the EA and in the final decision. Once the final decision on this project is released the Forest Service has a commitment to the public to complete the project as announced. What plan is the Bozeman District going to put into place to ensure that the project is completed in a timely manner and as presented to the public?</p>	<p>As far as funding goes, the completion of the EA and getting a signed Decision Notice is the most difficult and often the most costly part of nearly every project. Once this is done money is a lot easier to acquire. This is because most projects of this scale of activity are only funded when the environmental analysis process is complete and there is a signed decision.</p> <p>This project has broad support at the District and Forest level. This is a high priority area to complete decommissioning compared to other areas on the Forest. We know we need to get the sediment output under control to comply with the Forest Plan and the Clean Water Act. We know there are more roads than we need for resource management purposes and more than we can afford to maintain. We also know that whatever action alternative is chosen in the Travel Plan they all would require decommissioning of these roads. This all means the Forest has the desire to see that the project is completed as quickly and efficiently as possible. But there is no absolute guarantee since Congress decides what kind of dollars the Forest Service gets each year. However, there also may be other opportunity for funding such as grants.</p> <p>Continuity would come in the form of the contract used to implement the decommissioning. The contract would stay basically the same from year-to-year. There may be slight contract changes over time to implement new ideas and make decommissioning more effective but it would basically set the standard. We also have a pool of local contractors that have completed a number of decommissioning projects on the Forest. This helps with implementation and continuity by not having to continually retrain contractors. The persons administering the contract are certified Contracting Officers Representatives. They would administer it to a certain standard, keep the same kinds of records, and visit the work sites frequently usually every day and they often work with the contractor all day. This is especially true when culvert areas are being reclaimed.</p>