



Brian Schweitzer, Governor

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September 15, 2006

Ms. Lesley W. Thompson, Forest Supervisor
Lewis and Clark National Forest
1101 15th Street North
Great Falls, MT 59401

Re: Little Belt, Castle, and North Half Crazy Mountains Travel Management Plan
Draft Environmental Impact Statement (DEIS)

Dear Ms. Lesley W. Thompson:

The Lewis and Clark National Forest (LCNF) has issued the draft EIS for the Little Belt, Castle, and North Half Crazy Mountains Travel Management Plan to define a road and trail transportation system to provide a variety of motorized and non-motorized recreation opportunities for the 1,050,110 acres of National Forest lands in the analysis area between Great Falls, Wilsall, White Sulphur Springs and Judith Gap, Montana. Thank you for providing the Department of Environmental Quality Water Quality Planning Bureau the opportunity to comment on this draft EIS.

Travel Management Plans are critical elements in the management of National Forests, providing direction to manage road and trail networks for public recreation and the conduct of land management activities, including ecosystem restoration. It is important that Travel Plans be tiered to the Forest Plan and include direction for upgrading road/trail BMPs; removing and/or reclaiming poor condition roads/routes to meet water quality standards; and appropriate limitations on motorized vehicles that minimize travel impacts on watersheds, water quality, fisheries, wetlands, soil integrity, and overall ecosystem functions. Where there are conflicts between recreational access and vehicle usage and the long-term ecosystem protection, resource/ecosystem protection must be given priority in order to sustain and protect healthy ecosystems for present and future generations.

The current National Forest Service Strategic Goals and Objectives include:

GOAL: IMPROVE WATERSHED CONDITION. Increase the number of forest and grassland watersheds that are in fully functional hydrologic condition.

Objective 5.1—Assess and restore high-priority watersheds and maintain riparian habitat in these watersheds.

Objective 5.2—Monitor water quality impacts of activities on NFS lands.

Objective 5.3—Restore and maintain native and desired nonnative plant and animal species diversity in terrestrial and aquatic ecosystems and reduce the rate of species endangerment by contributing to species recovery.

All DEIS action alternatives appear to be improvements to the existing situation (no action); however, we believe it may be possible to develop a new modified alternative that better optimizes and balances access needs and the many environmental and resource management trade-offs. We believe such optimization can be done by building upon the resource protections in Summer-Alternatives 5 and 4 and Winter-Alternatives 3 and 2. We believe the preferred alternative should include a greater commitment of resources to road maintenance to reduce negative impacts and risks to water quality and fisheries. Adequate budgets need to be provided to maintain the roads remaining on the road system within the analysis area. We encourage the Forest Service to incorporate as much road rehabilitation and road closure and decommissioning as possible in its preferred alternative.

The draft Little Belt, Castle, and North Half Crazy Mountains Travel Management Plan indicates that the Desired Condition is based on: “the applicable laws, regulations and policy”, including the Federal Clean Water Act and Montana Water Quality Law, and that “meeting Forest Plan direction” is a “critical component” of the Desired Condition. (Draft Plan Ch 3, Water Quality Section). The draft plan goes on to state: “The most important activities that have affected water resources are livestock grazing, water uses and roads and trails...An important Management Standard in the Forest Plan for Soil, Water and Air Protection (F3) is: 1) require application of Best Management Practices to project activities to ensure meeting or exceeding State water quality standards.”

A key Little Belt, Castle, and North Half Crazy Mountains Travel Management DEIS issue is: “Water Quality” (p. 196). The DEIS identifies a notable number of watersheds in the analysis area as having poor watershed conditions and acknowledges that roads and trails “have resulted in elevated sediment levels”. The DEIS indicates that there are over 1,900 miles of road in the analysis area, 469 miles of roads within 100 feet of a stream, 3,167 road stream crossings, and several areas with high road densities (p. 198 to 204). The DEIS also states that that many streams in the analysis area have a high sensitivity to disturbance (pages 198-199). The DEIS acknowledges that regular road maintenance is important in reducing sediment production from road surfaces and drainage systems (page 205), but that only 3.3 to 9.2% of the roads in the analysis area have been maintained yearly since 2000. The risk to water quality of perennial streams “from roads and trails receiving little or no maintenance is moderate or greater” (p. 207). “It is likely that many roads and trails will continue to impact water quality and fish habitat, and the maintenance backlog will persist, given expected funding levels” (p. 278).

The Montana DEQ is concerned that only 3.3 to 9.2 % of the roads in the analysis area have been maintained yearly since 2000 and that the current levels of road and trail maintenance will hold or decrease in the future. There appears to be inadequate funding and resources to properly maintain roads and keep them in fair to good condition to

minimize erosion and water quality and fisheries impacts, and keep them from delivering excess sediment to area streams. We encourage the Forest to restrict off-road vehicles (ORVs) to designated routes to stop cross-country travel causing resource damages, and illegal user created non-system roads should be closed and obliterated, with closures policed and enforced. We do not support the development of new airstrips if they will compete for limited road maintenance funds, and thus, reduce already minimal funding available for road maintenance necessary for reducing water quality impacts from roads.

Compliance with Montana water quality standards requires “No increases above naturally occurring concentrations of sediment or suspended sediment... which render the waters harmful to... fish, or other wildlife.” (Administrative Rules of Montana 17.30.621, 622, 623, et seq.). The 1996 and 2004 Montana 303(d) lists includes streams within the DEIS analysis area that do not meet water quality standards (Appendix A, 2004 DEQ Water Quality Integrated Report). Siltation and habitat alterations are listed as causes of impairment on the 2004 303(d) list for Belt Creek and the South Fork Judith River. Sediment from roads and degraded road conditions are likely contributing to water quality impairments for these waterbodies. Logging road construction and maintenance is identified as a probable source of impairment for the South Fork Judith River (p. 345). It should also be noted that the absence of a specific stream segment from the 303(d) list does not imply that the stream segment is meeting State standards, but often simply indicates that the stream has not been assessed by the Department.

Inadequate road maintenance in the 303(d) listed Belt Creek and South Fork Judith River drainages are of particular concern, as are the impairments to fisheries and fish habitat from roads in the drainages of Middle Fork Judith River, King Creek, North Fork Running Wolf Creek, Hoover Creek, Jefferson Creek, Sheep Creek, Deadman Creek, lower Tenderfoot Creek, Daisy Dean Creek, and Haymaker Creek (p. 277, 281).

Compliance with water quality law requires: 1) Best Management Practices/Soil and Water Conservation Practices are applied, 2) Beneficial Uses are not impaired, and 3) monitoring to test whether management activities are protecting Beneficial Uses. It is important to note that “reasonable soil, land and water conservation practices” – required for impaired streams - are differentiated from soil and water BMPs, which are generally established practices for controlling nonpoint source pollution. BMPs are largely practices that provide a degree of protection for water quality, but may or may not be sufficient to achieve Water Quality Standards and protect beneficial uses. Simple application of BMPs which do not achieve Water Quality Standards and protect beneficial uses are insufficient to meet state regulations. In order to meet the State law requiring “reasonable soil, land and water conservation practices” additional actions and conservation practices, beyond BMPs to achieve Water Quality Standards and restore beneficial uses, may be necessary.

Efforts to improve road conditions and reduce sediment delivery from roads should be an important element of the Travel Plan. The Plan should be consistent with Total Maximum Daily Loads (TMDLs) and water quality restoration strategies that will be developed to restore water quality and beneficial use support in impaired 303(d)-listed waters in the

area. Significant sources of pollutant loading may also occur in unlisted tributaries, and watershed restoration activities must include all sources of pollution, hence the need to identify and address pollution sources throughout the watershed, **including tributaries** to listed waters. Forest system roads and trails are often the major contributing source for water quality impairments from sediment.

The Lewis & Clark NF should coordinate their travel management planning with the Montana DEQ staff to assure travel plan consistency with TMDLs and water quality restoration plans once TMDL planning efforts are initiated in this area. Proposed travel management should also be discussed with any local watershed groups that may be involved in preparing TMDLs and water quality restoration plans. For this area, since Water Quality Restoration Plans/TMDLs have not yet established detailed restoration targets for impaired waters, State Law requires that management actions do not further degrade the impaired waters, but rather that new activities promote restoration of water quality and achieve support of beneficial uses (Montana Code Annotated 75-5-703(10c)). Aquatic/water quality effectiveness monitoring activities that are being carried out to evaluate water quality effects should also be described.

In order to achieve Forest Service national objectives of “increasing the number of forest and grassland water-sheds that are in fully functional hydrologic condition” and to “monitor water quality impacts of activities on NFS lands,” the LCNF travel plan for the Little Belt, Castle, and North Half Crazy Mountains area must include measures to restore watershed conditions, along with in-stream water quality monitoring to assess trends for affected streams functioning at risk.

There should be an effective program for monitoring, evaluation and adaptive management to assure that the effects of travel management are identified and that management is modified where necessary to mitigate adverse effects. The brief discussion of monitoring in the DEIS (p. 26) states that monitoring could be used to evaluate the physical, biological, social and economic effects of implementing alternatives (Appendix E). The DEIS, however, does not appear to clearly state a commitment or assurance that adequate monitoring will be conducted to identify effects from travel management or a commitment that effects of travel management will be mitigated with a monitoring and adaptive management program.

The Little Belt, Castle, and North Half Crazy Mountains Travel Management DEIS watershed restoration activities need to assure substantial progress toward meeting water quality standards for impaired streams within the planning horizon of the management project. Key watershed restoration actions should be designed to substantially meet forest and state water quality standards within this project’s planning horizon. In particular, the restoration elements to reduce adverse impacts to water quality and to promote water quality restoration should include: reducing overall road/trail miles (to achieve forest road density/impact standards), reducing roads in riparian areas, reducing road stream crossings, road reclamation, relocate roads away from streams as much as possible, upgrading roads using BMPs, additional limitations on motorized uses to assure that they occur in a manner and location that will achieve LCNF and Montana water

quality standards. Please include an analysis of how much progress each of the action alternatives would make toward (and a schedule) for meeting the LCNF and Montana water quality standards.

We did not see clear specification of which roads or a schedule in regards to the extent to which road/trails in poor condition with maintenance needs which are delivering sediment to streams would be restored (methods and timing p. 211). This should be clarified in the final EIS. The final Travel Management Plan and EIS should include a clear definitive commitment to implement specific road/trail BMP applications and road drainage improvements. We recommend that an estimated schedule for carrying out needed road BMP improvements and/or road decommissioning to address problems associated with road/trail conditions and motorized uses be provided. We believe road networks should be limited to those that can be adequately maintained within agency budgets and capabilities, and if roads cannot be properly maintained we believe they should be decommissioned.

In summary, all action alternatives appear to have potential to reduce adverse effects on water quality, since all action alternatives would reduce the total miles of roads and trails open to motorized use, and some roads would be decommissioned. We believe the preferred alternative should include a greater commitment of resources to road maintenance to reduce risks to water quality and fisheries. Adequate budgets need to be provided to maintain the roads remaining on the road system within the analysis area. We encourage the Forest Service to incorporate as much road rehabilitation and road closure and decommissioning as possible in its preferred alternative. In addition, we strongly encourage on-the-ground monitoring of riparian and water quality effects and implementation of watershed restoration activities. Achieving water quality standards which fully support the beneficial uses for the aquatic life and fishery is necessary in these watersheds and will assure that the travel plan is consistent with TMDLs and water quality restoration plans. The final Travel Management Plan and EIS needs to include an analysis and timeline of how much progress the preferred action alternatives would make toward meeting the LCNF and Montana water quality standards.

If you have any questions regarding these comments please feel free to contact me or my staff.

Sincerely,



Robert Ray
Watershed Protection Section Manager

cc: Steve Potts, EPA – Missoula
Dean Yashan, DEQ

-2-5-1-3-D



"Ray, Robert"
<r-ray@mt.gov>

09/15/2006 03:13 PM

To: <comments-northern-lewisclark@fs.fed.us>

cc: "Yashan, Dean" <DYashan@mt.gov>,
<Potts.Stephen@epamail.epa.gov>

Subject: LBCC Travel Plan

Attached are the Montana Department of Environmental Quality Nonpoint Source Management Program's comments on the Forest's Little Belt-Castle-Crazy Mountains Travel Management Plan draft Environmental Impact Statement. A hard copy is being mailed separately.

Sincerely,

Robert Ray
Watershed Protection Section
Department of Environmental Quality
(406) 444-5319



Lewis&Clark NF Little Belt-Castle-Crazy TMP DEIS 0906 Cmts.doc

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