



United States
Department of
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Forest
Service

November 2009



Leicester Hollow and Ridge Trails Project

Decision Memo

USDA Forest Service, Eastern Region
Green Mountain National Forest
Middlebury Ranger District

Towns of Brandon and Leicester

Addison and Rutland Counties, Vermont

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I. SUMMARY

As District Ranger for the Middlebury Ranger District of the Green Mountain National Forest (GMNF), I am authorizing the implementation of the Leicester Hollow and Ridge Trails Project. Activities authorized as part of this decision include relocating portions of the Leicester Hollow Trail out of the floodplain, eliminating recreation uses on Leicester Hollow Trail, designating snowmobile use on the Ridge Trail, and conducting watershed restoration activities to Leicester Hollow Brook. This project will result in repaired public recreation resources and transportation systems damaged by the August 2008 flood incident; improve watershed health; enhance the effective use of partnerships; and reduce public health and safety risks. The project is located on National Forest System land in the Towns of Brandon and Leicester, Addison and Rutland Counties, VT on the Middlebury Ranger District of the GMNF (see attached map).

II. DECISION TO BE IMPLEMENTED

A. Background and Project Area

Record rainfall on August 6, 2008 produced some of the most severe storm damage seen on the GMNF in many years. Many roads, bridges, trails, recreation sites, and watersheds were damaged. The heaviest amount of damage occurred on the north half of the forest, primarily in the towns of Goshen, Leicester, Brandon, Ripton, Rochester, and Hancock on the Rochester and Middlebury Ranger Districts. The slow moving storm produced between five and seven inches of rain in a short time period, resulting in widespread damage to public and private infrastructure. Many flood-impacted areas, trails, and roads became unsafe for public travel and access to many popular areas, including the Leicester Hollow Trail, was restricted or closed. Historically, the Leicester Hollow Trail, a multiple use trail managed for snowmobile, bicycle, equestrian, and foot travel (hike, ski, snowshoe), has been damaged by over five different flood events in the past decade. Currently, the Leicester Hollow Trail is severely washed out to the extent that repair in its current location is not feasible or sustainable against future flood events. Due to the 2008 flood event, six trail bridges that cross Leicester Hollow Brook have been completely destroyed and the stream course has changed substantially within the valley to areas that used to be the trail. This has resulted in limited public access to the area and trails that are popular among local residents and visitors to Vermont. In addition, connectivity to a portion of the state-wide snowmobile trail system (VAST Corridor 7A) has been cut off and inoperable for one year due to a temporary trail closure of the Leicester Hollow Trail.

B. Purpose and Need

Presently, the Leicester Hollow Trail (FT130) has limited access and has been closed to public use due to extensive flood damage since August 2008. Proposed repairs to the trail involve reconstructing the trail tread out of the floodplain to improve the ecological integrity of the watershed and to establish a more sustainable trail that requires less long-term maintenance costs. Due to terrain limitations, reconstruction of the Leicester Hollow Trail will not be able to accommodate future recreation opportunities for snowmobile and equestrian uses. This trail provides an important link within the state-wide snowmobile trail system between the GMNF and other State and private lands. This trail also provided equestrian recreation opportunities within the Moosalamoo National Recreation Area (NRA). There is a desire to reroute these uses from the Leicester Hollow Trail to the Ridge Trail (FT 177.01) to maintain high quality and diverse recreation opportunities and minimize the long-term ecological impacts to Leicester Hollow Brook.

The purpose and need for these actions is to:

- Repair public recreation resources damaged by the August 2008 flood incident.
- Restore a piece of the GMNF transportation system that has historically provided public access to popular recreation areas and trails.
- Improve watershed health by rerouting trails out of the floodplain and removing damaged infrastructure, restoring natural channel dimensions, and stabilizing banks.
- Enhance the effective use of partnerships to maintain the GMNF trail system by reconstructing trails and restoring recreation uses that are supported by long-standing partnerships with the Moosalamoo Association, Vermont Mountain Bike Association and the Vermont Association of Snow Travelers (VAST).
- Provide a diverse range of high-quality, sustainable recreation opportunities that complement those off of the GMNF by retaining connectivity of the state-wide snowmobile trail system through the GMNF.
- Reduce public health and safety risk by eliminating dangerous bridge crossings and removing damaged culverts.
- Reduce deferred maintenance on the trail system by reconstructing trails to standard.

Important management goals and objectives associated with this proposal include providing “a diverse range of high-quality, sustainable recreation opportunities that complement those provided off National Forest System lands” while increasing “the effective use of partnerships in the improvement, maintenance, and operation of the Forest trails system” (Goal 12 and Objective, Forest Plan p.15). In addition, the proposal addresses the management objective to “reduce the total deferred maintenance on the GMNF trail system” (Goal 12 Objective , Forest Plan p.15) and the guidance that trail maintenance and improvement activities should focus on the reduction of deferred maintenance needs on existing trails before the development of new trails (Forest Plan, p. 35). Another important management goal associated with this proposal is to “Provide a safe, efficient, and effective Forest transportation system that meets both the needs of the Forest Service and the public” (Goal 14, Forest Plan, p. 16). The direction and desired future condition for the Moosalamoo Recreation and Education Area Management Area (MA 8.9) is to provide a full range of recreation opportunities including snowmobile trails (Forest Plan, p. 100).

Maintenance of this trail is consistent with the GMNF recreation niche of focusing on the fact that the Forest’s large, contiguous blocks of land are well suited to trail-based activities in backcountry settings. In addition, working in partnership with many organizations will continue to be a hallmark of how the Forest Service provides recreation opportunities to the public (Forest Plan, pages 9 and 15). This project is consistent with the Forest Plan.

C. Description of Decision

To meet the Purpose and Need, my decision is to approve the Leicester Hollow and Ridge Trails Project activities. The Forest Service will work cooperatively with several partners to perform the necessary work as outlined below. All trail work will comply with FSH 2309.19 – Trails management handbook; snowmobile trail work will also comply with the standards found in the *Guide for Development of Snowmobile Trails* that was prepared by the International Association of Snowmobile Administrators, and the Green and White Mountain National Forests.

This decision includes implementation of Mitigation Measures listed in Appendix A. This decision is based upon an environmental analysis conducted by Forest Service personnel, and responses to public scoping. This information is located in the project planning record at the GMNF Rochester Ranger District Office in Rochester, VT.

Leicester Hollow Trail (FT130)

Construct an approximate 1.0 mile section of Leicester Hollow Trail to a new location with a higher elevation in the ravine outside of the floodplain to connect with the Minnie Baker Trail (FT253) on the west side of Leicester Hollow Brook (see Figure 1). Sections of the Leicester Hollow Trail that are not in the floodplain and were not damaged by flood events will remain and will connect to the newly constructed trail segments. Specifically the connected actions are to:

- Re-designate approximately 0.2 mile section of the Minnie Baker Trail (FT253) as the Leicester Hollow Trail (FT130) from the point where the proposed reconstructed section of the Leicester Hollow Trail intersects with the Minnie Baker Trail east to the point where it intersects with the existing Leicester Hollow Trail (see bottom of Figure 1, Point A to Point B).
- The relocated trail sections from Silver Lake south to the junction of the Minnie Baker Trail (FT253) will be designed and managed to Class 3 mountain bike trail design standards. Reconstructed sections of trail between the Minnie Baker Trail south to the Brandon Town Road will be designed and managed to Class 4 snowmobile trail standards.
- The existing managed snowmobile and equestrian uses will be eliminated from the Leicester Hollow Trail from Silver Lake south to the junction of the Minnie Baker Trail. This section of trail will be managed for foot travel (hike, ski, snowshoe) and bicycle use only. The section of trail from the junction with the Minnie Baker Trail south to the Brandon Town Road will continue to be managed for foot travel (hike, ski, snowshoe), equestrian and snowmobile uses.
- This proposal also includes the decommissioning of five trail bridges that cross Leicester Hollow Brook and the reconstruction of two trail bridges.

Ridge Trail (FT177.01)

Re-designate the Ridge Trail (FT177.01) as a Class 4 snowmobile trail. Currently, the Ridge Trail is managed for foot travel only (hiking, skiing, snowshoeing) and receives very little public use. The trail is primarily located on an old skid trail used for past and present timber management purposes. Re-designating the Ridge Trail would require the following improvements:

- Removal of trees (approximately 5, including 3 snags) and rocks that protrude more than six inches above the trail tread.
- Minor reroute (approximately 0.2 miles in length) to provide for a more sustainable location to cross a perennial stream.

- Construction of a 16' bridge to cross a small perennial stream.
- Installation of a 24" x 16' culvert on an intermittent stream.
- Reconstruction of the trail tread for a length of approximately 50' in order to obtain the standard trail width of 11-13'.
- At the completion of soil disturbing activities, seeding (with an appropriate seed mix) and mulching would occur at critical areas to reduce erosion (Forest Plan, G-7, p. 21).

There will be a net increase of approximately 0.1 miles of designated snowmobile trails on the GMNF with this proposal. The northern terminus of the Ridge Trail will be at the Goshen Trailhead/Silver Lake parking eastern lot off of Forest Road 27. The southern terminus of the Ridge Trail ends at the Brandon Town Trail on Fay Road. From there, the snowmobile trail will follow the Town Trail west to the Brandon Town Road in Leicester Hollow. At that point, snowmobile users can either travel south to SR 73 or north and west via the Leicester Hollow and Minnie Baker Trails to SR 53. The VAST has obtained permission from the Town of Brandon to utilize these Town trails and roads, including Churchill Road Bridge, as part of the statewide snowmobile trail system. VAST has also obtained permission from the State of Vermont to ride along Vermont State Route 73 and private landowners further south to complete the connection of Corridor 7A to Corridor 7.

Leicester Hollow Brook Restoration

Decommission and remove five trail bridges that cross Leicester Hollow Brook. Where bridges are removed, restore the natural channel dimensions and stabilize banks with boulders from on-site, as necessary. Re-shape stream channels to their approximate original bank slope and shape, as indicated by nearby natural stream banks. A small-tracked excavator will be used for channel restoration work.

III. REASONS FOR CATEGORICALLY EXCLUDING THE DECISION

Decisions may be categorically excluded from documentation in an environmental impact statement or an environmental assessment when they are within one of the categories found at 36 CFR 220.6(d) and (e), and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative environmental effect.

A. Category of Exclusion

Based upon the environmental analysis contained in the Project Record and on experience with similar activities on the GMNF, I have concluded that this decision can be appropriately categorically excluded from documentation in an environmental impact statement or environmental assessment. I have determined that the selected action is a routine activity within the following category of exclusion found at 36 CFR 220.6(e) (1): *Construction and reconstruction of trails.*

B. Relationship to Extraordinary Circumstances

The list of seven extraordinary circumstances that were examined for this analysis may be found at 36 CFR 220.6(b). The mere presence of one or more of these resource conditions does not preclude use of a categorical exclusion. It is the degree of the potential effects of a proposed action on these resource conditions that determines whether extraordinary circumstances exist. I have concluded that there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative effect on the quality of the human environment. My conclusion is based on information presented in this document and the

entirety of the record. A summary of the project's potential effects on each resource condition is as follows:

1. Federally Listed Threatened or Endangered Species or Designated Critical Habitat, Species Proposed for Federal Listing or Proposed Critical Habitat, or Forest Service Sensitive Species –

A Biological Evaluation (BE) was prepared in October 2009 to assess the likelihood of occurrence, habitat needs, and determination of findings regarding Threatened, Endangered, and Sensitive (TES) wildlife species in the project area (Widowski 10/21/2009). Based on the analysis in the BE, the likelihood for occurrence of any threatened and endangered (T&E) species in the project area is low. The GMNF has historic occurrence records of three T&E species (eastern cougar, gray wolf, and Canada lynx), and current occurrence records for one species (Indiana bat). There are no known T&E wildlife species occurrences currently in any of the areas (Widowski field review 10/21/2009). There is no potential or critical habitat within the project area, and because the project areas exceeds elevation of 800 feet, the potential for Indiana bat maternal roosting habitat is low (Forest Plan, p. 27). As a result, there will be "no adverse effect on species or critical habitat."

This project site has been surveyed for Regional Forester Sensitive Species (RFSS) (Widowski 10/21/2009). No RFSS animals are known to occur within the project area and a survey of the sites did not identify any individuals or ideal habitat for RFSS animals. This project will have "no impact" on any of the RFSS or their preferred habitats.

A BE was prepared in September 2009 to assess the likelihood of occurrence, habitat needs, and determination of findings regarding TES plant species in the project area (Deller 9/30/2009). Based on the analysis in the BE, the authorization of the Leicester Hollow and Ridge Trails Project will have "no adverse effect on species or critical habitat" for Threatened and Endangered Species; since there are no federally listed plant species on the GMNF. In addition, authorization of this project will have "no impact" on any of the plant RFSS or their preferred habitats. Mitigation measures (Appendix A) are expected to prevent effects to ginseng (*Panax quinquefolius*), the only plant on the RFSS list that is known to occur along the Ridge Trail, and broad beech fern (*Phegopteris hexagonoptera*), a plant on the RFSS list that has potential habitat there, but has never been found. The project will not affect potential habitat for the ginseng or broad beech fern. No plants on the RFSS list are known to occur along the Leicester Hollow Trail. Implementation of this project is not likely to lead to loss of viability or trend toward federal listing for any rare plants on the RFSS list (Deller 9/29/2009).

2. Floodplains, Wetlands, or Municipal Watersheds –

The proposed trail improvements for the Ridge Trail are not in a municipal watershed or floodplain, and would not impact wetlands. No site specific soil or water resource mitigation is needed on this project. The proposed trail improvements for the Leicester Hollow Trail are not in a municipal watershed, and would not impact wetlands. The project is within a floodplain. The project would reduce impacts to the floodplain, since several old stream bridges would be removed. Two stream bridges would be replaced in the floodplain. During future flood events, the impact of these two bridges to Leicester Hollow Brook and its floodplain would be very minimal. Mitigation measures are identified in Appendix A for soil and water resources. No significant impacts to floodplains, wetlands or municipal watersheds are expected to result from this project. (Communication with staff Soil Scientist, 9/30/2009).

3. Congressionally Designated Areas, such as Wilderness, Wilderness Study Areas, or National Recreation Areas –

Wilderness:

This decision does not affect Wilderness. The project is not in or near Wilderness. Wilderness is identified on the Forest as Management Area 5.1 (Forest Plan, p. 49). The closest Wilderness to the project area is the Joseph Battell Wilderness Area, which is over 2 miles from the project area. This decision will not affect the Wilderness Area (communication with Recreation Planner, 9/24/2009).

Wilderness Study Areas:

There are no Congressionally designated Wilderness Study Areas on the GMNF (communication with Recreation Planner, 9/24/2009).

National Recreation Areas:

The GMNF contains two NRAs: the *Moosalamoo NRA* and the *Robert T. Stafford White Rocks NRA*. The Leicester Hollow and Ridge Trails are located within the Moosalamoo NRA. One general objective of the Moosalamoo NRA includes providing for public enjoyment of the area for outdoor recreation and other benefits. Implementation of this decision document is consistent with management direction and the desire for the Moosalamoo NRA to exemplify outstanding recreation opportunities (including a range of trail experiences). The proposed action would move the project area toward the desired future condition for MA 8.9, Moosalamoo Recreation and Education Area. (communication with Recreation Planner, 9/24/2009).

Wild and Scenic Rivers:

Although the GMNF does not contain any Congressionally designated Wild and Scenic Rivers, there are many river segments that are eligible to be further considered for addition to the National Wild and Scenic River System. These river segments and their associated corridors are within the Eligible Wild, Scenic, and Recreational Rivers Management Area (MA 9.4). The Leicester Hollow and Ridge Trails are located within the eligible scenic river corridor for the Leicester Hollow Brook. The Leicester Hollow Brook is an Eligible Scenic River with outstandingly remarkable values for Botanical and Ecological resources (Forest Plan, page 107). This decision will not affect the outstandingly remarkable values identified for this eligible Scenic River (communication with Recreation Planner and concurrence from Forest Botanist and Ecologist, 9/2009).

4. Inventoried Roadless Areas or Potential Wilderness Areas –

There are no inventoried roadless areas (Roadless Area Conservation Rule or Forest Plan Inventoried Roadless Areas) in the project area. This decision will not affect inventoried roadless areas (communication with Recreation Planner, 9/24/2009).

5. Existing and Candidate Research Natural Areas –

There are no candidate or existing Research Natural Areas in the project area. This decision, with impacts limited to the immediate area of activity, will not affect Research Natural Areas (communication with staff ecologist, 9/30/2009).

6. American Indian and Alaska Native Religious or Cultural Sites –

See Item 7 below.

7. Archaeological Sites, or Historic Properties or Areas –

This decision complies with the National Historic Preservation Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act. There will be no adverse effects to any cultural or historical resources as a result of this decision (concurrence from Forest Archaeologist, 9/23/09).

8. Other Resources –

In addition to resource conditions that could lead to extraordinary circumstances, I also have considered the direct, indirect, and cumulative effects to other resources such as soil/water, fisheries, visuals, recreation, and non-native invasive species. The project will not result in significant impacts to these resources, particularly because all applicable Forest Plan Standards and Guidelines will be implemented.

IV. PUBLIC INVOLVEMENT

This project was listed in the quarterly *Green Mountain National Forest Schedule of Proposed Actions* (SOPA) beginning January 1, 2009 for the “Leicester Hollow Trail Repairs” Project and October 1, 2009 for the “Ridge Trail Snowmobile Access” Project. The projects have been combined into one decision document and will remain in the SOPA until the project is authorized for implementation. Internal and external involvement included a field review by Forest Service recreation staff in November 2008 to make an initial assessment of the flood damage to the Leicester Hollow Trail. On April 28, 2009, Forest Service staff attended a field trip with Moosalamoo Association board members to assess the flood damage. On July 15, 2009, Forest Service engineering staff reviewed the Leicester Hollow Trail to determine if putting the trail back in its original location was feasible; they concluded it was not. On September 4, 2009, Forest Service recreation staff led a field trip for Diane Burbank, staff ecologist and plant biology representative, to review the Leicester Hollow reroutes. On September 17, a public field review was held to review the Ridge Trail. Forest Service staff (recreation, heritage, visuals, and safety) attended along with members of the Foote of the Mountain snowmobile club. Several invitations to attend field reviews were made available to representatives of the Center for Biological Diversity and Conservation Law Foundation to identify possible conflicts with their organizations goals; however, they were not able to attend any field reviews.

The desired decision was also made available for a 14-day public notice and comment period. The legal notice for the invitation to comment appeared in the *Rutland Herald* on October 8, 2009. The comment period began on October 9, 2009 and ended on Thursday, October 22, 2009. In addition, approximately 30 interested and/or potentially affected people and organizations received the mailing. Responses to comments submitted during the comment period may be found in Appendix B of this DM.

V. FINDINGS REQUIRED BY AND/OR RELATED TO OTHER LAWS AND REGULATIONS

My decision will comply with all applicable laws and regulations. I have summarized some pertinent ones below.

National Environmental Policy Act - This Act requires public involvement and consideration of potential environmental effects. The entirety of documentation for this decision supports compliance with this Act.

Forest Plan Consistency (National Forest Management Act) –The National Forest Management Act (NFMA) requires the development of long-range land and resource management plans, and that all site-specific project activities be consistent with direction in the plans. The GMNF Land and Resource Management Plan (Forest Plan) was completed and approved in 2006 as required by NFMA. The Forest Plan provides direction for all management activities on the GMNF. The Leicester Hollow and Ridge Trails Project implements the Forest Plan.

The Leicester Hollow and Ridge Trails Project Area is approximately 860 acres and is contained within the Moosalamoo National Recreation Area. The project area is located within the Green Mountain Escarpment and Moosalamoo Recreation and Education Area Management Areas (MAs 8.5 and 8.9, respectively) as designated by the Forest Plan. Portions of the project area are also within the Eligible Wild, Scenic, and Recreational Rivers Management Area (MA 9.4). The Leicester Hollow Brook is eligible to be further considered as a Scenic River for addition to the National Wild and Scenic River System (Forest Plan, p.107).

As noted in the Purpose and Need, maintenance of this trail is consistent with our recreation niche of focusing on the fact that the GMNF's large, contiguous blocks of land are well suited to trail-based activities in backcountry settings. Working in partnership with many organizations will continue to be a hallmark of how the Forest Service provides recreation opportunities to the public. (Forest Plan, pages 9 and 15). This project is also consistent with Forest Plan guidance that trail maintenance and improvement activities should focus on the reduction of deferred maintenance needs on existing trails before the development of new trails (Forest Plan, page 35).

As required by NFMA Section 1604(i), I find this project to be consistent with the Forest Plan including the goals, objectives, desired future conditions, and Forest-wide and MAs 8.5, 8.9, and 9.4 Standards and Guidelines. The proposed action would move the project area toward the desired future condition for MA 8.9, Moosalamoo Recreation and Education Area. All of the expected environmental effects from this project are anticipated to be within the range of the effects disclosed in the Final Environmental Impact Statement for the 2006 Forest Plan.

Endangered Species Act - The Endangered Species Act requires that federal activities do not jeopardize the continued existence of any species federally listed or proposed as threatened or endangered, or result in adverse modification to such species' designated critical habitat. In accordance with Section 7(c) of this Act, a report of the listed and proposed, threatened, or endangered species that may be present in the project area was reviewed. See Section III, Item B.1 of this document.

Clean Water Act – The intent of the Act is to restore and maintain the integrity of waters. The Forest Service complies with this Act through Forest Plan Standards and Guidelines, specific project design criteria, and/or mitigation measures to ensure protection of soil and water resources.

Wetlands (Executive Order 11990) - Executive Order 11990 directs the agency to avoid to the extent possible the adverse impacts associated with the destruction or modification of wetlands, and to avoid support of new construction in wetlands wherever there is a practical alternative. See Section III, Item B2 of this document.

Floodplains (Executive Order 11988) - Executive Order 11988 directs the agency to avoid to the extent possible the adverse impacts associated with the occupancy and modification of floodplains, and to avoid support of floodplain development wherever there is a practical alternative. See Section III, Item B2 of this document.

National Historic Preservation Act - Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effect of a project on any district, site, building, structure, or object that is included in, or eligible for inclusion in the National Register. It also requires federal agencies to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. See Section III, Item B.7 of this document.

Archaeological Resources Protection Act - The Archaeological Resources Protection Act covers the discovery and protection of historic properties (prehistoric and historic) that are excavated or discovered in federal lands. It affords lawful protection of archaeological resources and sites that are on public and Indian lands. See Section III, Item B.7 of this document.

Native American Graves Protection and Repatriation Act - The Native American Graves Protection and Repatriation Act covers the discovery and protection of Native American human remains and objects that are excavated or discovered in federal lands. It encourages avoidance of archaeological sites that contain burials or portions of sites that contain graves through “in situ” preservation, but may encompass other actions to preserve these remains and items. See Section III, Item B.7 of this document.

Wild and Scenic Rivers Act - See Section III, Item B.3 of this document.

Federal Noxious Weed Act of 1974 and Executive Order 11312 (Non-Native Invasive Species) – The Federal Noxious Weed Act requires cooperation with State, local, and other federal agencies in the management and control of non-native invasive species (NNIS); Executive Order (EO) 11312 requires all pertinent federal agencies (subject to budgetary appropriations) to prevent the introduction of NNIS. This project’s decision meets the intent of this law and EO by incorporating all pertinent Forest Plan Standards and Guidelines to ensure the management and control of NNIS.

Environmental Justice (Executive Order 12898) - This order requires consideration of whether projects would disproportionately impact minority or low-income populations. This decision complies with this order. Public involvement occurred for this project, the results of which I have considered in this decision-making. Public involvement did not identify any adversely impacted local minority or low-income populations. This decision is not expected to adversely impact minority or low-income populations.

VI. ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES

This decision is not subject to an administrative review or appeal pursuant to 36 CFR 215.

VII. IMPLEMENTATION DATE

This decision may be implemented immediately. Implementation is scheduled to begin in the fall/winter of 2009.

VIII. CONTACT PERSON

Further information about this decision can be obtained from Holly Knox during normal office hours (weekdays, 8:00 a.m. to 4:30 p.m.) at the Rochester Ranger District office, 99 Ranger Rd. Rochester, VT 05767; Phone: (802) 767-4261 x 530; or e-mail: hknox@fs.fed.us.

IX. SIGNATURE AND DATE

/s/ Gregory D. Smith

Date: November 3, 2009

GREGORY D. SMITH
District Ranger
Responsible Official

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APPENDIX A – Mitigation Measures

All pertinent Forest-wide and Management Area Standards and Guidelines (S&Gs) will be adhered to during project implementation. The following additional mitigation measures will also be adhered to during project implementation. Emphasis of some S&Gs are provided in this Appendix to ensure full compliance is achieved.

1. During bridge removals on Leicester Hollow Brook, ensure compliance with Soil, Water and Riparian Guideline G-6 (see Forest Plan, p. 21) which calls for mulching and seeding of bare soils within 25 feet of streams. The seed mix for revegetating bare soil areas should follow forest plan standards and guidelines, preferably using a mix of native species.
2. Following bridge removals on Leicester Hollow Brook, reshape the stream channels to their approximate original bank slope and shape (as indicated by nearby natural streambanks).
3. People constructing the Leicester Hollow trail reroutes should have a high level of experience in rock-work. It is critical that the pathways constructed in the rocky areas remain stable and do not contribute to slope disturbance or potential instability.
4. To protect rare plants known on the Leicester Hollow Trail and in the vicinity of the trail, including the population of hairy woodmint, it is critical that the reroute not occur in a place other than the proposed location. Several other species of plants on the RFSS list occur in this general vicinity, including poke milkweed (*Asclepias exaltata*), broad beech fern (*Thelypteris hexagonoptera*), squaw root (*Conopholis americana*), and small whorled pogonia (*Isotria verticillata*). These species should be avoided during project implementation.
5. Ginseng (*Panax quinquefolius*), a plant on the RFSS list, is known to occur along the edge of the Ridge Trail. If its location can be avoided during implementation, no effects to this species would be expected. A map will be provided.
6. The Leicester Hollow Trail should be monitored in the FY10 field season for non-native invasive plants (NNIP), and NNIP species should be treated using available methods. Non-native invasive plants, including common buckthorn and Morrow honeysuckle were found in the Leicester Hollow trail area during field reviews.
7. NNIP known to occur in the general vicinity of the Ridge Trail include common buckthorn, Morrow honeysuckle, wild chervil and Japanese knotweed. To prevent introducing NNIP, all equipment should be cleaned prior to accessing this trail to implement the project, and post-implementation monitoring should occur. In addition, any NNIP found should be treated with available methods.
8. The culvert installation on the intermittent tributary to Leicester Hollow Brook is in an area that is very steep and fairly incised after the 2008 flood. This not being a fish-bearing stream, a bottomless arch or buried culvert is not necessary. Though not fish bearing, a well designed and installed crossing will reduce potential for sedimentation reaching Leicester Hollow which is a very productive Brook trout stream.
9. When installing the approximately 16' bridge in the Ridge Trail, locate the bridge approximately 30' upstream where there are stable, naturally armored banks. The bridge sills should be placed back away from the top of the stream bank where no bank excavation is required.
10. Field construction crews should be notified that there is a State-designated deer wintering area approximately 0.2 miles north of the project area. If noticeable deer activity is evident during project implementation, field staff should consult with Forest Service wildlife staff to identify potential additional mitigation needs.
11. During implementation of riparian restoration work associated with this project, the following Forest Service staff should be consulted to identify any additional mitigation measures: Fisheries Biologist, Soil Scientist, and Forest Ecologist.

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APPENDIX B – Response to Comments

The following comments have been summarized from the letters received during the 14-day notice and comment period for the Leicester Hollow and Ridge Trails Project initiated by the legal notice in the *Rutland Herald* newspaper dated October 8, 2009. A total of 19 responses were received on the proposal, two after the comment deadline. Out of the 19 responses received, 13 supported the project with little or minor mitigations/suggested changes. Several comments expressed concern over the changes to the Leicester Hollow Trail and a desire to restore the trail to its original location with its historic uses. Other commenters expressed concern over the addition of snowmobiles to the Ridge Trail. One comment letter received after the deadline identified several questions that were answered directly with the commenter. All commenters are listed in the following table.

Comment Letter #	Commentator's Name
1	Bruce Brown
2	Tony Clark
3	Sarah Prattis, President, Brandon Area Chamber of Commerce
4	Susanne Wetmore
5	Curtis Cyr, President, Foote of the Mountain VAST Club
6	Tina Deering, Bridport Snobirds Snowmobile Club
7	Warren Foster
8	Arthur Pfenning
9	Merle Schloff
10	Doug Blodgett
11	Keith Arlund
12	Gary Wright
13	Dave Holbrook
14	Seth and Olya Hopkins, Churchill House Inn
15	Alexis Nowalk, Vermont Association of Snow Travelers
16	Tim and Melissa Gibbud and Family, Mill House Farm
17	Anthony Iarrapino, Conservatin Law Foundation
18	Deborah Wing
19	Bruce Flewelling

Comments have been categorized under descriptive headings. Each comment summary (*in italics*) is followed with the Forest Service response.

Support and Mitigation

The following comments pertain to this category:

- (1) *Moving the snowmobiles to the ridge trail is a great idea and I would hope that in the future, horse and mt bike activity would likewise be allowed on that trail. Fay's meadow is a great access point for horses/trailer and vehicle parking.*

Forest Service Response: In alignment with the 2006 Forest Plan and Guidelines for Saddle, Pack and Draft Animals and Bicycling, future bicycle or saddle, pack, and draft animal trails would be identified and maintained in cooperation with partners (Forest Plan, p. 36).

- (2) *The Brandon Area Chamber of Commerce considers the Leicester Hollow Trail as its primary access to the Moosalamoo National Recreation Area. Local residents as well as guests of various lodging establishments have in the past, been directed to this area as Brandon's access to the national forest and the Silver Lake area. The historic nature of the trail and the area, likewise is part of Brandon's history. The diverse recreational opportunities that once existed through the hollow are no longer available. The Chamber hopes that whatever approach the Forest Service ultimately takes, that at a minimum, an access will be provided to allow for all the recreational opportunities that were available in the past.*

Forest Service Response: As part of this proposal, access for several of the historical uses on the Leicester Hollow Trail, including bicycle and pedestrian use, will be maintained. See also response to Comment 1.

- (3) *As President of the Foote of the Mountain Sno Travelers snowmobile club, I want to relay my feelings about the benefits of this proposal. As you are aware, the Leicester Hollow Trail was a highly traveled trail that linked Ripton/Goshen area to Brandon. When snow conditions are marginal in the valley, this trail was usually passable and could bring riders up through Silver lake as well as linking into Chittenden Dammer trails that have one of the few corridor trails leading over into Pittsfield. The loss of the Leicester Hollow trail has greatly limited the ability of riders to go anywhere other than a dead end on our trails. Having walked a major portion of the proposed trail, I feel that other than trimming of trees there is minimal amount of construction that needs to be done to facilitate an adequate snowmobile trail. Most of the small water crossings that we did encounter, I believe can be quickly frozen with snow as we do with countless crossings utilizing our grooming apparatus. As you know, the snow-bridge creates a temporary crossing, allowing water to continue to flow beneath. In the spring there will be no cleanup and no residual effects to the area. I think this proposal is the best option to allow snowmobile recreation to continue into the Brandon area, allowing families the ability to access the Green Mountain National Forest.*

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal.

- (4) *It is of the utmost importance to the VAST trail system that the Ridge Trail be reopened for snowmobile travel. We have worked wonderfully as partners for many years and hope to continue for many more years. We, all snowmobilers in the state, rely on the mountain trails to access "snow country" as we can not depend on snow to ride here in the low lands very often. Please consider our desperate need of that trail, it would be greatly appreciated.*

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal.

- (5) *I personally appreciate the work you have done here to keep the general route up the Hollow open for biking, hiking and skiing, all of which I have done here over the years. [...] I look forward to continued use of the Hollow as a great passageway to Silver Lake.*

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal.

- (6) *Is it possible to do some [mountain bike] amenities at some places along the trails. I'm thinking of some simple log benches and tables.*

Forest Service Response: The Forest Service is not going to add these proposed changes to the Leicester Hollow and Ridge Trails Project Proposed Actions. We would like to consider options of enhancing the mountain biking experience on the National Forest and will continue to coordinate with the Vermont Mountain Bike Association in order to do so.

- (7) *I am a snowmobiler and like to ride the Leicester Hollow area (we have friends down in Chittenden)-so my wife and I go up to Chatfield (on 125) to load up on Sunday and ride down towards Chittenden. I know it takes a lot of work as I do help with trail work in Middlebury. Would love to continue to have access in area...and see trail system continue (on Ridge Trail or Leicester Hollow).*

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal.

- (8) *The Leicester Hollow Trail, also known as Corridor Trail 7A, serves as a vital link on the VAST Statewide Snowmobile Trails System (SSTS). The trail has been in existence for over thirty years and provides recreational opportunity and access onto and across the Green Mountain National Forest. The Leicester Hollow Trail is also a north/south route for snowmobile travel from the Brandon area to Silver Lake. Corridor 7a is maintained by the Foote of the Mountain Snowmobile Club of Middlebury which has 350+ members. The club is responsible for the trail maintenance, construction and grooming of 94 miles of corridor trails that encompasses diverse terrain and trail conditions. Approximately half of the club's trail system is located in the higher elevations of the Green Mountain National Forest where snow cover exists over the duration of the sixteen week snowmobile season. Many snowmobilers ride in this area when there is minimal snow coverage in the valley trails and surrounding low elevation areas. Currently, this area lacks an east/west snowmobile corridor from the Middlebury area east to the popular areas of Chittenden and Rochester where snow cover is predominant throughout the season, thus maintaining this important connection is crucial to the trail system.*

After assessing the trail damage from the August 2008 storm, it was determined that the Leicester Hollow Trail would be closed due to failed infrastructure and severe trail erosion. Since there wasn't ample time to define an alternate location for the snowmobile trail, Corridor 7A was closed for snowmobile use and the trail was removed from the Statewide Snowmobile Trails Map for the 2009 season. This closure significantly impacted the flow of snowmobile traffic on the SSTS, severing the important corridor from Silver Lake and Brandon. Since there was a missing link in the system, alternatives were reviewed by the local VAST Club and Forest Service Personnel. It was determined that the Ridge Trail could serve as an alternate route for the Leicester Hollow Trail and is a feasible option in terms of minimizing ground disturbance and complying with the current VAST trail standards. The work detail involves trail debris brushing, widening of several corners to accommodate grooming equipment and minimal trail tread work. The Ridge Trail would connect the SSTS at the recently improved and constructed Leicester Hollow Bridge, which was replaced in 2005 through the effort of several local VAST Clubs. Permission has been obtained on both ends of this trail from landowners including the Town of Brandon and the State of Vermont.

Approximately 15% of the Statewide Snowmobile Trails System is located on public land. Maintaining the VAST trail system on public lands is more important than ever especially with the increasing changes in parcel ownership. This has resulted in a challenge for VAST in maintaining existing trail locations on private land. Thus the Leicester Hollow and Ridge Trail Project is of valuable interest to our trail system and to our members that recreate in this area. Maintaining these vital trail corridors on the Forest is crucial in sustaining the integrity of the SSTS. VAST supports the Forest Service's efforts in securing a re-location of the Leicester Hollow Trail to the Ridge Trail for multiple use recreation.

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal.

- (9) *Moving the snowmobiles to the Ridge Trail is also a very good idea. We encourage many types of recreational use of the forest and think that continuing the snowmobile use of the GMNF provides a service to Vermonters who do enjoy the sport.*

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal.

- (10) *We believe strongly that the Leicester Hollow Trail in particular, as a historic ancient carriage road, is a treasure that must be restored. Further, the access from Vermont Route 73 over Churchill Road and the bridge there over the Neshobe is a singularly important gateway for Brandon into the Green Mountain National Forest and Moosalamoo National Recreation Area. We encourage the USFS to actively support the reconstruction and reopening of that bridge (sometimes known as the "Churchill Road bridge") as a partner project to your larger project of restoring and improving upon the trail system --- this bridge is the key that unlocks all this wonderful work you are proposing. If it is not replaced, these trail improvements will go unused or at least radically underused. We thank you so very much for this excellent proposal regarding the work you plan on doing to bring back the Leicester Hollow Trail and to greatly improve the Ridge Trail. Our best wishes for success in your work.*

Forest Service Response: Thank you for your support of the Leicester Hollow and Ridge Trails Project proposal. The Forest Service will continue to work with the Town of Brandon in support of reopening the Churchill Road bridge.

Concerns Regarding the Leicester Hollow Trail Proposal

The following comments pertain to this category:

- (11) *As a historic 150 year old access "road" to the Silver Lake area, I would like to see it returned to its historic route. I do, however, understand the problems/costs/environmental issues that make this not the best option. I would hope that a reroute of the trail will allow an important access to the NRA be preserved.*

Forest Service Response: Historically, the Leicester Hollow Trail has been damaged by over five different flood events in the past decade-resulting in ongoing maintenance needs, associated financial impacts, and potential impacts to ecological resources. Currently, the Leicester Hollow Trail is severely washed out to the extent that repair in its current location is not feasible or sustainable against future flood events. The Forest Service considered the possibility of reconstructing the Leicester Hollow Trail in its historical footprint but deemed the action not reasonable or prudent given the potential ecological, financial, and maintenance need impacts.

- (12) *I know that you know how I feel about the trail that it should be brought back to its original route with the belief that it is a historical route and that it should be preserved that way. The compromises work but I hope that there will be enough feedback from the region to make a decision in the best interest of the general public.*

Forest Service Response: See response to Comment 11.

- (13) *I am encouraged that something will be done but am disappointed that it does not include some restoration for hiking for the Hollow trail. This trail has historic importance and was one of the nicest in the Moosalamoo system. I realize that in these economic times that budgets are low that it may seem wasteful to work on this trail. However as a long time hiker of this spot I am hoping that it could at least be made passable to foot travel. The birds and plants there have been a source of delight. It was one spot I surveyed during the 5 year Vermont Bird Atlas Project and found nesting species.*

Forest Service Response: The Leicester Hollow and Ridge Trails Project Proposed Actions

include maintaining pedestrian access on the Leicester Hollow Trail, along both the newly constructed trail segments and portions of the existing trail.

- (14) *The Leicester Hollow washout bypasses if not made wide enough for Vast are going to loose out a partner that has been totally helpful for the riders and skiers. Vast cuts out most of the fallen trees across the trail and keeps the trail well packed for one of the best x-c runs around. There are at least five larger trees across the trail now. With the reroute who will do this function and how often will they do it?*

Forest Service Response: The Forest Service relies on many partners to help maintain our extensive trail network. Organizations such as the Vermont Mountain Bike Association, Moosalamoo Association, and Vermont Youth Conservation Corps are just a few of the possible entities who could help address maintenance needs on the Leicester Hollow Trail.

- (15) *We are the innkeepers at the Churchill House Inn, which is located just below the southern terminus of the Leicester Hollow Trail as it crosses the Neshboe River in Brandon. We are very pleased to hear that the Leicester Hollow Trail will be reconstructed and suitable for hikers again as you bring it out of the floodplain. This hollow is a truly exceptional passive recreation opportunity for members of the public who would find the Chandler Ridge to the west too challenging. We hope that the "new" Leicester Hollow will again be a broad, easily followed trail along the brook, a good recreation option for folks who may consider themselves more woods-walkers than serious hikers. Two particular groups of guests would be well-served by a reconstruction of the Leicester Hollow trail as a broad walk rather than a difficult hike: older tourists who may not wish to take the risk of the ridge hikes, and families with young children who may walk some distance but not the whole way --- it would be super if the trail were in good enough shape, as it already is south of the Minnie Baker trail, to push a rugged stroller.*

Forest Service Response: Reconstructing the Leicester Hollow Trail out of the floodplain will alter the current character of the trail in the rerouted portions. Due to terrain limitations (steep, rocky hillside), the rerouted portions will be built to Class 3 mountain bike trail design standards (18-30" wide). See also response to Comment 11.

Concerns Regarding Access on the Ridge Trail

The following comments pertain to this category:

- (16) *I feel that the importance of the area as a biking and hiking area as well as a remote area of fire protection needs should be a primary area for funding, over and above snowmobile trails*

Forest Service Response: This project is located within the Moosalamoo Recreation and Education Area MA as described in the 2006 Forest Plan. The MA emphasizes multiple use management including prescribed fire and recreation resources. The Desired Future Condition for this area is to provide a range of trail experiences including biking, hiking, skiing and snowmobiling. Priorities for funding these programs are outside of the scope of this decision.

- (17) *our Department's [Vermont Fish and Wildlife Department] principle concerns with the proposal are the potential impacts/disturbance of snowmobiles either in or proximate to deer and/or moose wintering areas, particularly along the 4.5 miles of the Ridge trail route. We would urge you to avoid and/or sufficiently buffer these critical winter habitats in your trail planning efforts.*

Forest Service Response: Forest Service wildlife biology staff communicated with the Vermont Fish and Wildlife Department to discuss the concern of potential impacts to deer and/or moose in relation to snowmobile access on the Ridge Trail. A subsequent field

review was held to evaluate the Proposed Action and the potential impacts to the deer wintering area was analyzed. Mitigation measures were identified (see Appendix A) including the need for consultation should noticeable deer activity be evident.

(18) *This is a comment on your choice to allow VAST to use the Ridge Trail. VAST would access the trail at Silver Lake and exit at Fays Meadow. Where do they go from there?*
Forest Service Response: The southern terminus of the Ridge Trail ends at the Brandon Town Trail on Fay Road. From there, the snowmobile trail will follow the Brandon Town Trail west to the Brandon Town Road (Churchill Road) in Leicester Hollow. At that point, snowmobile users can either travel south to SR 73 or north and west via the Leicester Hollow and Minnie Baker Trails to SR 53.

(19) *This is a comment on your choice to allow VAST to use the Ridge Trail. VAST would access the trail at Silver Lake and exit at Fays Meadow. [...] If their intent is to use the bridge on Churchill Road, the following issues persist: Disruption of the only V.O.F. certified Emu in the state. Last year being the first year of production as the Emu breed in the winter. No snowmobile traffic came through due to trail shutdown.*
Forest Service Response: The bridge and road in question are under the jurisdiction of the Town of Brandon. The GMNF has no authority to grant or restrict use on this particular section of trail. It is our understanding the Town of Brandon has granted VAST permission to continue their traditional use of the referenced section of trail across the bridge and town road.

(20) *This is a comment on your choice to allow VAST to use the Ridge Trail. VAST would access the trail at Silver Lake and exit at Fays Meadow. [...] Two hit and run accidents in 2007-2008. Reports made to police. These involved 1 forster child and our daughter.*
Forest Service Response: The Forest Service has no record of these incidents. If the incidents occurred on Churchill Road near private residences, the road and allowable uses are under the jurisdiction of the Town of Brandon and outside the scope of this project.

(21) *This is a comment on your choice to allow VAST to use the Ridge Trail. VAST would access the trail at Silver Lake and exit at Fays Meadow. [...] Pollution, both noise and fumes (within 16 feet of our home). 250+ machines within a 48 hour period at all times of day and night. This caused, headaches, upset stomachs, short tempers from lack of sleep and the inability to reasonably enjoy our home*
Forest Service Response: The Leicester Hollow and Ridge Trails Project clearly fits the category of actions that “normally do not individually or cumulatively have a significant effect on the quality of the human environment and, therefore may be categorically excluded from documentation in an EIS or an EA”. The potential impacts, individual and cumulative, of the project are within the range of the impacts disclosed in the programmatic Forest Plan FEIS. As stated in the DM and as evidenced by the Project Record, this proposal is consistent with Forest Plan direction and standards and guidelines.

The Final Environmental Impact Statement (FEIS) used to adopt the 2006 Forest Plan analyzed activities for the entire forest, including snowmobiling, at the programmatic scale. It also disclosed at the programmatic level, the range of impacts of snowmobile use on various resources. More specifically, the FEIS looked at snowmobiling as part of a “Recreation Management” issue and incorporated it into the analysis of five different Forest Plan alternatives. This analysis evaluated different levels of snowmobile use and those alternatives determined the percentage of the Forest in which construction and/or maintenance of a snowmobile trail would be consistent with the Forest Plan. The Leicester Hollow and Ridge Trails Project is consistent with the alternative selected for Forest Plan implementation. The range of alternatives in the Forest Plan was developed to adequately

address issues, including those concerning snowmobile use, and to meet the purpose and need for Forest Plan revision.

(22) *This is a comment on your choice to allow VAST to use the Ridge Trail. VAST would access the trail at Silver Lake and exit at Fays Meadow. [...] This particular route has seven (7) violations of Title 23, Chapter 29, Article 3206, a, b, c, 2, 3, 4, 5.*

Forest Service Response: The Ridge Trail Project itself does not violate any of the referenced state statutes. The designated route on NFS lands do not cross any public ROWs. Sections of the trail outside of the GMNF that are under the management jurisdiction of the Town of Brandon and State of Vermont may cross public ROWs. These areas are not within the management jurisdiction of the GMNF for decision making and outside the scope of this project.

(23) *Will horseback riding be allowed on the Ridge Trail once you have improved it to snowmobile use standards?*

Forest Service Response: At this time, horse use will not be allowed on the Ridge Trail. Bringing the Ridge Trail up to trail design standards for snowmobile use does not meet the design standards for horse use. Although the Ridge Trail could potentially allow horse use in the future, this would need to be covered under a separate decision document.

(24) *This is a comment on your choice to allow VAST to use the Ridge Trail. VAST would access the trail at Silver Lake and exit at Fays Meadow. [...] The Gibbud Family, Churchill Bridge, Churchill Rd Right of way, and the Town of Brandon are now in court after, multiple attempts from the family to discuss their intent to no avail.*

Forest Service Response: The Forest Service is not party to this lawsuit because it has no jurisdictional rights over the route in question, therefore this comment is outside the scope of this project which is specific to sections of the trail on NFS lands.

Concerns Regarding Snowmobile Trail Administration

The following comments pertain to this category:

(25) *In previous comment letters, CLF has documented the extent to which the USFS's GMNF snowmobile trail system administration run afoul of various aspects of federal laws and regulations including N.E.P.A. and the Forest Service regulations governing the need for special use permits for commercial and group activities on the forest. Those earlier comment letters and administrative include but are not limited to those filed in relation to the Liberty Hill and Natural Turnpike projects. Those comments are hereby incorporated by reference as are CLF's comments on the last round of Forest Management Planning for the GMNF.*

Forest Service Response: The Forest Service has reviewed comments submitted by the Conservation Law Foundation (and those submitted in conjunction with the Center for Biological Diversity) expressing concern in regards to the USFS's GMNF snowmobile trail administration. Previous responses addressed concerns relating to issues such as, but not limited to: the use of categorical exclusions that fail to account for cumulative effects; the failure to conduct a NEPA review for the entire GMNF snowmobile trail system; the failure to complete an EIS for a system-wide review of snowmobile trails; the inadequacy of the 2006 Forest Plan analysis of snowmobile trail impacts; the lack of adherence to Executive Orders 11644 and 11989; the need for VAST to obtain a Special Use Permit; and concerns regarding the public involvement process. Responses provided to those concerns are available in documents including: the Liberty Hill Snowmobile Trail Relocation Final Decision Memo Appendix B (1/18/2008); the Natural Turnpike Final Environmental Assessment Content Analysis and Response to Comments (3/2008); the Corridor 100 (C-

100) Snowmobile Trail Relocation Project Final Decision Memo Appendix B (1/29/2009); and the Mt. Tabor Winter Trailhead and Snowmobile Trail Relocation Project Attachment 2 (3/4/2008).

- (26) *We must not overlook the cumulative effects of all Green Mountain National Forest decisions to exclude the analysis of connecting trails for VAST, this is not only short sighted but self defeating in addressing the spirit of it's duties and responsibilities to ALL the public.*

Forest Service Response: The environmental analysis did consider potential cumulative effects of the proposed action in conjunction with effects of past, present, and reasonably foreseeable related future actions within the context of the localized effects. A thorough review of all potential extraordinary circumstances was also completed (in this Decision Memo). A full range of natural resource professionals including a wildlife biologist, botanist, soil scientist, archaeologist, and recreation planner have reviewed this project and documented effects. These resource effects have been reviewed by the Responsible Official. The analysis also examined how these localized impacts fit within the context of those impacts disclosed in the 2006 GMNF Forest Plan FEIS [GMNF Forest Plan FEIS, pp. 3-28 to 3-32 (soil); 3-37 to 3-40 (water); 3-46 (air); 3-207 to 225 (recreation); 3-95 to 3-97 (NNIS); 3-320 to 3-323 (heritage); FEIS Appendix E – Biological Evaluation, pp. 50 to 151; and FEIS Appendix H – Response to Public Comments, pp. 221 to 243 (Dispersed Recreation Management – 53000)] . Based on this review, on public scoping, and on Forest Service resource specialists' analyses associated with the project, it was determined that there would be no significant cumulative effects resulting from the proposed action. Likewise, the minor actions proposed here, when added to similar interdependent actions that could be proposed for implementation on other small sections of the snowmobile trail system, would result in no adverse overall cumulative impact.

- (27) *The second part of this issue is that VAST is NOT a partnership but a commercial business and needs to be permitted on these lands as conditional use.*

Forest Service Response: The GMNF has a long-standing partnership with VAST that's implemented through a challenge cost share (CCS) agreement. VAST is a non-profit organization that shares the mutual interest of maintaining and improving the snowmobile trail system on the Forest. The CCS agreement is the most appropriate method of authorization for this type of business relationship. The purpose of these agreements with VAST, and other similar trail based recreational organizations such as the Green Mountain Club (GMC) and Catamount Trail Association (CTA), is for the purpose of the maintenance of trail system on the GMNF. These trails, which are often multiple-use trails, are maintained in accordance with the GMNF Forest Plan, relevant Forest Service Trail manuals and handbooks, and the National Environmental Protection Act (NEPA). Special use permits are typically used with profit-making organizations whose proposals are consistent with approved land management plans, but are not part of the agency's core management activities and responsibilities. As an example, outfitter guide permits may be issued to various clubs within or outside of VAST to authorize the use of snowmobile trails by certain commercial groups that offer guided rides/trips. SUPs are also issued to VAST when they host special events for groups of 75 persons or more.

In regards to the Leicester Hollow and Ridge Trails Project, the GMNF has the discretion as to how to implement any decision coming out of this project. The question as to whether VAST should be issued a SUP for its operation is outside the scope of the project analysis. The decision to relocate the trail does not require issuance of any special use authorizations or imply such action.