Martin Creek Watershed Restoration Project

DECISION NOTICE

Bitterroot National Forest
Sula Ranger District
Ravalli County, Montana

January 10, 2013

Lead Agency:	United States Forest Service
Responsible Official:	Charles T. Oliver Acting District Ranger
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DECISION NOTICE

DECISION

On September 30, 2012 a decision was made on the Martin Creek Watershed Restoration Project, a 45 day appeal period followed and the Decision was appealed on November 23, 2012. The appeal was reviewed by the Regional Appeals Office, and the decision was remanded to the Forest meaning that the intial decision (dated September 30, 2012) was to be withdrawn and another decision made that would address those appeal points, which meant dropping several roads from the project. Roads 73010, 73108, 73272 that were initally planned for decommission and road 73109 that was initially planned for storage were recommended to be dropped from this decision (dated January 10, 2013). This document is that new decision.

After careful review of the Environmental Assessment (EA) and the Finding of No Significant Impact (FONSI), and including the recommendation for the Martin Creek Watershed Restoration Project, the project record, and the public and agency comments I have received, I have decided to select Alternative 2 modified to include a foot path on recontoured roads and exclude roads 73010, 73108, 73272, and 73109 from action. Foot paths on treated decommissioned roads will be inlcuded to address public concern regarding the difficulty of foot and stock access on the recontoured roads.

Alternative 2 as modified will store 53 miles and decommission 57 miles of road that were previously classified as undetermined in the Bitterroot National Forest's roads database, otherwise called National Resourse Manager Roads (NRM-Roads). This category is for roads that are no longer in use and are typically grown over sometimes to the extent that they have faded back into the landscape with only the road prism visible under a thick regrowth of trees. Many of the legacy roads in the Bitterroot were used for logging systems from previous management activities and are often redundant to regularly used system roads and too grown over for regular vehicle use.

Table 1. Alternative 2, with foot paths in Detail

The roads proposed for decommissioning are located mostly in Martin, Bertie Lord, and Cameron Creeks. A small number of roads are located in Swift, Jennings Camp, Bugle, Lodgepole and the Kerlee-Dowling Face. The roads are scattered across these watersheds, extending through and occasionally beyond the legal descriptions below:

- Lodgepole T1N R18W S1
- Swift T2N R17W S31; T2N R18W S36
- Bertie Lord T2N R17W S 9, 10, 11, 34
- Cameron T2N R18W S 5, 32, 33
- Martin T2N R18W S 2, 3; T3N R18W S 21, 22, 27, 28, 34, 25

Table 1: Modified Alternative 2 in Detail

Road Number	Watershed Area	Road Miles	Proposed Treatment	Road Number	Watershed Area	Road Miles	Proposed Treatment
73001	Bertie Lord	3.4	Decommission - No Treatment	74935	Cameron	0.2	Decommission - No Treatment
73002	Bertie Lord	0.7	Decommission - No Treatment	74936	Cameron	0.2	Decommission - No Treatment
73003	Bertie Lord	0.3	Decommission - No Treatment	74937	Cameron	0.2	Decommission - No Treatment
73004	Bertie Lord	1.6	Decommission - No Treatment	73023	Cameron	0.4	Decommission - No Treatment
73006	Bertie Lord	1.3	Decommission - No Treatment	73269	Dowling Gulch	0.3	Decommission - No Treatment
73018	Bertie Lord	0.2	Decommission - No Treatment	73316	East Fork	0.9	Decommission - No Treatment
73019	Bertie Lord	0.4	Decommission - No Treatment	73318	East Fork	0.4	Decommission - No Treatment
73022	Bertie Lord	0.3	Decommission - No Treatment	73257	Jennings Camp	0.9	Decommission - No Treatment
73039	Bertie Lord	0.2	Decommission - No Treatment	73264	Dowling Gulch	0.0	Remove from Project
73040	Bertie Lord	0.5	Decommission - No Treatment	73028	Martin Creek	1.0	Decommission - No Treatment
73041	Bertie Lord	0.4	Decommission - No Treatment	73029	Martin Creek	0.3	Decommission - No Treatment
73814	Bertie Lord	0.4	Decommission - No Treatment	73031	Martin Creek	0.5	Decommission - No Treatment
73063	Cameron	1.5	Decommission - No Treatment	73042	Martin Creek	0.4	Decommission - No Treatment
73611	Bugle Creek	0.2	Decommission - No Treatment	73046	Martin Creek	1.0	Decommission - No Treatment
73612	Bugle Creek	0.3	Decommission - No Treatment	73049	Martin Creek	0.7	Decommission - No Treatment
73805	Bugle Creek	0.3	Decommission - No Treatment	73050	Martin Creek	0.3	Decommission - No Treatment
73806	Bugle Creek	0.2	Decommission - No Treatment	73051	Martin Creek	0.3	Decommission - No Treatment
73024	Cameron	0.4	Decommission - No Treatment	73052	Martin Creek	0.2	Decommission - No Treatment
73103	Cameron	0.6	Decommission - No Treatment	73056	Martin Creek	0.8	Decommission - No Treatment
73104	Cameron	0.2	Decommission - No Treatment	73057	Martin Creek	0.4	Decommission - No Treatment
73105	Cameron	0.3	Decommission - No Treatment	73060	Martin Creek	0.3	Decommission - No Treatment

Road Number	Watershed Area	Road Miles	Proposed Treatment	Road Number	Watershed Area	Road Miles	Proposed Treatment
73106	Cameron	0.1	Decommission - No Treatment	73062	Martin Creek	0.6	Decommission - No Treatment
73107	Cameron	0.2	Decommission - No Treatment	73064	Martin Creek	0.1	Decommission - No Treatment
73110	Cameron	0.3	Decommission - No Treatment	73067	Martin Creek	0.7	Decommission - No Treatment
73112	Cameron	0.4	Decommission - No Treatment	73070	Martin Creek	0.3	Decommission - No Treatment
73113	Cameron	0.2	Decommission - No Treatment	73078	Martin Creek	0.3	Decommission - No Treatment
73114	Cameron	0.2	Decommission - No Treatment	73079	Martin Creek	0.4	Decommission - No Treatment
73116	Cameron	0.7	Decommission - No Treatment	73080	Martin Creek	0.2	Decommission - No Treatment
73117	Cameron	0.5	Decommission - No Treatment	73081	Martin Creek	0.7	Decommission - No Treatment
73118	Cameron	0.7	Decommission - No Treatment	73082	Martin Creek	0.7	Decommission - No Treatment
73120	Cameron	0.8	Decommission - No Treatment	73083	Martin Creek	0.4	Decommission - No Treatment
73123	Cameron	2.4	Decommission - No Treatment	73084	Martin Creek	0.4	Decommission - No Treatment
73124	Cameron	0.5	Decommission - No Treatment	73085	Martin Creek	1.1	Decommission - No Treatment
73129	Cameron	0.1	Decommission - No Treatment	73088	Martin Creek	0.3	Decommission - No Treatment
73130	Cameron	0.2	Decommission - No Treatment	73089	Martin Creek	0.5	Decommission - No Treatment
73132	Cameron	0.4	Decommission - No Treatment	73090	Martin Creek	1.4	Decommission - No Treatment
73091	Martin Creek	0.5	Decommission - No Treatment	73109	Cameron	6.3	Remove from Project
73093	Martin Creek	0.2	Decommission - No Treatment	73133	Cameron	1.7	Store - Treatment
73148	Martin Creek	0.3	Decommission - No Treatment	73150	Cameron	0.4	Store - Treatment
73608	Martin Creek	0.4	Decommission - No Treatment	73605	Swift Creek	1.6	Store - Treatment
73807	Martin Creek	0.1	Decommission - No Treatment	73606	Swift Creek	0.8	Store - Treatment
73149	Cameron	0.4	Decommission - No Treatment	722	Martin Creek	2.8	Store - No Treatment

Road Number	Watershed Area	Road Miles	Proposed Treatment	Road Number	Watershed Area	Road Miles	Proposed Treatment
73150	Cameron	0.3	Decommission - No Treatment	73001	Bertie Lord	1.6	Store - No Treatment
73151	Cameron	0.3	Decommission - No Treatment	73008	Bertie Lord	3.7	Store - No Treatment
73264	Dowling Gulch	0.0	Remove From Project	73012	Bertie Lord	1.4	Store - No Treatment
74933	Cameron	0.5	Decommission - No Treatment	73014	Bertie Lord	1.5	Store - No Treatment
74934	Cameron	0.1	Decommission - No Treatment	73016	Bertie Lord	1.0	Store - No Treatment
73808	Swift Creek	0.2	Decommission - No Treatment	73039	Bertie Lord	0.5	Store - No Treatment
73006	Bertie Lord	0.7	Decommission - Treatment	73094	Martin Creek	0.8	Store - No Treatment
73007	Bertie Lord	1.2	Decommission - Treatment	5790	Bertie Lord	5.1	Store - No Treatment
73010	Bertie Lord	1.2	Remove from Project	73102	Cameron	2.7	Store - No Treatment
73011	Bertie Lord	1.3	Decommission - Treatment	73105	Cameron	0.6	Store - No Treatment
73015	Bertie Lord	1.1	Decommission - Treatment	73111	Cameron	0.5	Store - No Treatment
73017	Bertie Lord	0.5	Decommission - Treatment	73115	Cameron	1.0	Store - No Treatment
73018	Bertie Lord	0.0	Duplicate Entry	73116	Cameron	0.7	Store - No Treatment
73803	Bertie Lord	0.3	Decommission - Treatment	73121	Cameron	1.1	Store - No Treatment
73108	Cameron	0.3	Remove from Project	73128	Cameron	1.9	Store - No Treatment
73122	Cameron	0.7	Decommission - Treatment	73264	Dowling Gulch	0.0	Remove from Project
73125	Cameron	0.6	Decommission - Treatment	73131	Cameron	0.2	Store - No Treatment
73127	Cameron	0.4	Decommission - Treatment	73270	Dowling Gulch	0.3	Store - No Treatment
73131	Cameron	1.3	Decommission - Treatment	1394	Martin Creek	1.3	Store - No Treatment
74934	Cameron	0.2	Decommission - Treatment	8178	Martin Creek	6.0	Store - No Treatment
74938	Cameron	0.2	Decommission - Treatment	73043	Martin Creek	0.5	Store - No Treatment
73266	Dowling Gulch	0.5	Decommission - Treatment	73044	Martin Creek	1.1	Store - No Treatment

Road Number	Watershed Area	Road Miles	Proposed Treatment	Road Number	Watershed Area	Road Miles	Proposed Treatment
73177	Hart Creek	0.6	Decommission - Treatment	73053	Martin Creek	0.5	Store - No Treatment
73271	Kerlee Ck	0.4	Decommission - Treatment	73059	Martin Creek	0.6	Store - No Treatment
73272	Kerlee Ck	3.8	Remove from Project	73065	Martin Creek	3.2	Store - No Treatment
73279	Lodgepole	0.9	Decommission - Treatment	73072	Martin Creek	0.6	Store - No Treatment
73280	Lodgepole	0.3	Decommission - Treatment	73076	Martin Creek	1.4	Store - No Treatment
73222	Lyman	0.5	Decommission - Treatment	73077	Martin Creek	0.4	Store - No Treatment
73027	Martin Creek	1.6	Decommission - Treatment	73086	Martin Creek	1.1	Store - No Treatment
73035	Martin Creek	0.5	Decommission - Treatment	73092	Martin Creek	0.3	Store - No Treatment
73813	Martin Creek	0.3	Decommission - Treatment	73607	Meadow Creek	1.4	Store - No Treatment
73009	Bertie Lord	0.9	Store - Treatment	73623	Bugle Creek	<0.1	Already decommissioned, needs only stabilizing treatment at 1 crossing on Bugle Creek
73624	Bugle Creek	1.1	Drop from project				

This table supersedes any mapping error that may occur inadvertently.

A detailed description of modified Alternative 2 is described in this Decision Notice (DN, pages 2-5 and 8-13) and it is slightly different from Alternative 2 listed in the Environmental Analysis (EA) and the September 30, 2012 decision. I have listened to concerns from public comment and Forest Service specialists, and as a result of public comment, our interdisciplinary team for the South Zone analyzed additional information gathered after the release of the EA. I wanted to ensure there was no conflict with Travel Planning. This EA does not make travel planning decisions for recreation purposes. Those few legacy roads-or road segments- [less than 20 miles total] - that were in conflict with Travel Planning have been further addressed to ensure any ATV travel currently active on these roads or segments applicable to the 2001 OHV Tristate Ruling will be maintained pending a final decision for the Travel Plan EIS for the Bitterroot NF. With this decision, we have completed the environmental analysis needed to identify which of the Legacy/undetermined roads are needed to access the land area served by both system and undetermined roads analyzed in this project. Those undetermined roads that we have identified as redundant will be decommissioned to prevent sedimentation impacts to the watershed. Those roads identified as having potential for future entry for land management activities will be stored until they are needed for management of the National Forest System lands in the Martin Creek watershed.

BACKGROUND

In the winter of 2008/2009 the Bitterroot National Forest identified a fundamental error in the current data base used for tracking road information (Iweb). Going back through the records we found approximately 600 miles of road erroneously identified as decommissioned in the data base. This error related to coding in the old Road Management System (RMS) database. The RMS had a Maintenance Level code of historic, or HIST and the Bitterroot National Forest used this code to identify roads that were grown in, not being utilized by full size vehicle traffic, the actual situation on the ground. When Infra, or now National Resource Manager Roads (NRM-Roads) was being developed, there was no HIST code available for use. The roads coded with HIST for the Maintenance Level and a status of existing were rolled into a decommissioned status in the new database. Upon discovery of this error, a decision was made to change the status of these roads from decommissioned to existing and change the system from not needed to "undetermined". This action did not place these roads on the transportation system, but did uniquely identify this subset of roads so they can easily be identified during future planning efforts. The Bitterroot National Forest can make decisions to store or decommission these roads, project by project, based on the transportation system needed to manage Forest Service lands. Martin Creek Watershed Restoration Project is a project that proposes to do that on a subset of these "undetermined" roads located in the East Fork Bitterroot River watershed.

To make a decision whether or not to include these "undetermined" roads in the Forest Service Transportation System, a transportation analysis was needed. This analysis occured in the Martin Creek Watershed Restoration Project using the NEPA process to verify these "undetermined" roads inclusion in (storage) or removal (by decommissioning) from the Forest transportation system. In 2009 these undetermined roads were reviewed in the field to determine the existing condition. This information was used along with aerial photos and maps by an interdiscplinary team consisting of a fisheries biologist, wildlife biologist, fire/fuels specialist, timber, hydrology technician, transportation planner, soil scientist, botanist, historian, OHV ranger, and the District Ranger, to identify roads needed for future management, and potential road treatments needed to protect other resources. Decommissioned roads would be removed from the transportation system and would not be available for future forest management. Roads needed for current or future management be placed on the transportation system and stored. Stored and decommissioned roads would be stabilized where needed to protect and improve aquatic resources, none of these roads would be opened or improved for access at this time.

PURPOSE AND NEED FOR ACTION

The purpose of the Proposed Action is to:

1) Determine the future need for abandoned roads that are classified as "undetermined" in the transportation database *and to return necessary roads back to the transportation system and decommission other undetermined roads as appropriate,* permanently removing them from the transportation system. To complete a roads analysis that would identify those system roads needed for the land area served by the "undetermined" roads. The stored and decommissioned roads would be appropriately coded in the transportation database.

2) Apply appropriate treatments on roads to be stored or decommissioned that reduce sediment sources and improve soil conditions. These proposed treatments will protect and improve watershed, soils, and fisheries resources and meet the intent of the Water Quality Restoration Plan and Total Maximum Daily Loads (TMDL) for the Bitterroot Headwaters Planning Area (2005) by reducing sediment sources in the East Fork Bitterroot River watersheds while still retaining roads necessary for future timber management activities, or recreation and access purposes, in a storage category.

3) Comply with the Bitterroot National Forest Land Management Plan (The Plan) to actively reduce sediment sources from existing roads and to minimize the adverse affects on water quality and fish habitat during construction and maintenance of roads (these roads currently receive no maintenance).

The proposed action identifies undetermined roads needed for future forest management and access and updates the transportation database, NRM-Roads within the project boundary and complies with 36 CFR 212 Subpart A, Section 212.5 (b)(1). At project completion, a sustainable, long-term road system will be in place that will reduce sediment from current levels and provide appropriate access.

The proposed action is needed to comply with the Bitterroot Headwaters TMDL. The Headwaters TMDL provides direction to reduce forest sediment load in the East Fork Bitterroot River by 42% (TMDL, p. 171). Storage and decommissioning treatments will improve soil conditions including infiltration, improve vegetative cover, reduce erosion, and to help restore natural hydrology. Natural stream characteristics will be established at crossings and sediment transport from the roads will be reduced. Water Quality Restoration Plan and Total Maximum Daily Load for the Bitterroot Headwaters Planning Area (TMDL) (DEQ, 2005) estimated that 0.8 tons of sediment was contributed by each stream crossing in the East Fork Bitterroot River watershed. Elimination and improvement of vegetative conditions on 21 stream crossings that were identified in the 2009 field inventory would decrease sediment contributions to project area streams by an estimated 16.8 tons. In the TMDL, sediment from forest roads was estimated at 1,570 tons/year; this project would reduce that by about 1%, not a large amount but when combined with other treatments throughout the East Fork watershed contributes towards the goal of a 42% reduction.

This project will not determine motorized travel by vehicle type and time of year on the transportation system as outlined in the 2005 Travel Management Rule. The travel by vehicle type and time of year for the Bitterroot National Forest will be analyzed in the Bitterroot National Forest Travel Management Planning Project Final Environmental Impact Statement Record of Decision.

ALTERNATIVES CONSIDERED IN DETAIL

ALTERNATIVE 1 (No Action)

This alternative would not make a decision on the which undetermined roads are needed to manage the lands in this area and would defer treatments to reduce soil and watershed impacts. Storage or decommissioning of undetermined roads would occur at some later date (EA, page 12). Timing of future analysis would be tied to when the Forest could complete the required environmental analysis and

documentation and on the Travel Plan Decision.

ALTERNATIVE 2, modified to include a foot path, Selected Alternative

The Martin Creek Watershed Restoration Project (MCWR) is a transportation analysis that identifies which undetermined roads are needed for future access and management of the national forest and address soil stabilization and hydrologic issues. The analysis focused on 121 miles of undetermined roads (EA, Section 2.9, Appendix A, PF-ROADS-1). The interdisciplinary team (IDT) and District Ranger reviewed each undetermined road and identified whether it was needed for future management or access and could be placed back onto the forest transportation system as a stored road or decommissioned – permanently removed from the forest transportation system if not needed for future management or access. The IDT used information collected in 2009 on the actual condition of the road, examined nearby system roads, reviewed long-term needs for timber, fuel and fire management, recreation access, and considered risks to water quality, soil productivity, wildlife, and other resources to determine the need for each road. The roads in modified Alternative 2 are located throughout the East Fork Bitterroot River watershed in Lodgepole, Swift, Kerlee, Dowling, Bertie Lord, Jennings Camp, and Cameron Creeks. The project as proposed is intended to agree with and compliment decisions that could be made in the Bitterroot National Forest Travel Management Planning analysis.

Table 1 in this Decision Notice, list the roads included in modified Alternative 2 and their proposed treatment. Table 2, below is a summary of that information.

Table 2: Proposed Miles of Road for Storage or Decommission

	No Treatment Needed (miles)	**Additional Treatment Needed (miles)**	**Total Road Miles in Modified Alternative 2**
Stored Roads – Place on the transportation, roads will be available for future use.	47	6	53
Decommissioned Roads – Permanently removed from transportation system.	42	15	57

Map 1
Martin Creek Watershed Restoration Project
Alternative 2 modified

mgw, 1/10/2013

Legend

Only roads colored as below are included in Alt. 2

- Decommission-NoTreatment
- Decommission-Treatment Needed
- Store-No Treatment
- Store-Treatment Needed

0 0.35 0.7 1.4 2.1 2.8
Miles

N

Fifty-three miles of the undetermined roads in the project area that have been identified for future transportation needs (vegetation management, fire management, and recreation) would be returned to NRM-Roads, the transportation database as stored roads. *Approximately 47 miles of these roads are well vegetated and not erosive; these would receive no active treatments, would be left in their present condition* and identified in NRM-Roads as "stored". They would receive no further treatments and do not need additional work to stabilize soils or protect water quality.

The remaining stored roads (about 6 miles) would receive treatments to improve vegetative cover and reduce erosion. Road storage treatments often involve decompacting the road surface followed by revegetation treatments at stream crossings, recontoured drainages, entrances, or where disturbed soils are greater than 100 square feet. The preferred method of decompaction is use of a subsoil grapple rake mounted on an excavator and it provides for better infiltration of precipitation and improved plant growth. Subsoiling or decompaction is the ideal and preferred treatment for road storage since the road prism can easily be reopened for future use and vegetation remains in place. Stream crossings and ephemeral drainages are recontoured and the road entrance is typically closed by recontouring the first 100 feet of the entrance. More extensive recontouring of the entire road prism can occur where stability issues exist but recontouring does not typically occur on stored roads, since these will be reopened and used in the future. Stored roads would be classified as Maintenance Level I roads, meaning that they need no maintenance until the time that they are opened for future use; they would not contributing to degradation of other resources.

Photo 1 is an example of road decompaction using the subsoil grapple rake. This road was treated in 2010. The vegetation currently visible on the road surface is residual vegetation.

Photo 1: Road Receiving Subsoil Treatment, similar to what is proposed for stored roads

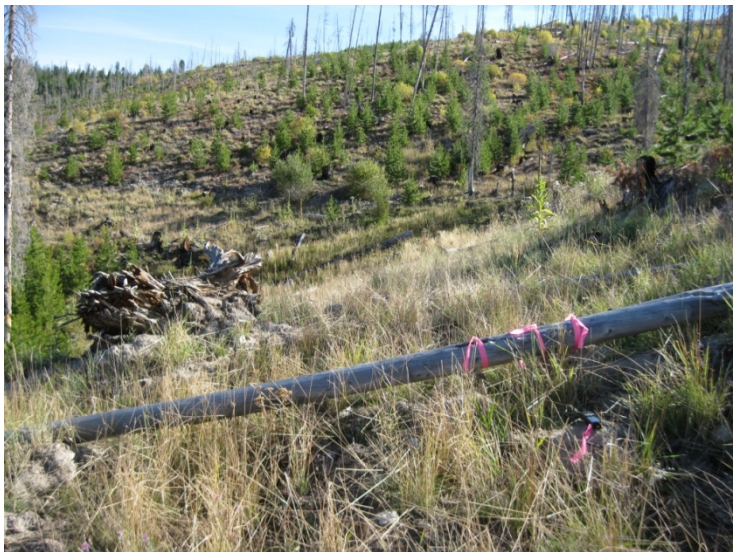
Fifty-seven miles of undetermined roads have been identified as surplus (access is duplicated by a nearby road), they were built in a location that decreases or is a threat to forest health (water quality, fisheries, wildlife), or they were constructed for a logging system that is no longer in use. These roads would be decommissioned and permanently removed from the forest transportation system. The majority (about 42 miles) need no treatment; they are stable, well vegetated, naturally recovering sites.

About fifteen miles of these decommissioned roads would need some form of active treatment.

Road decommissioning treatments often include decompacting the road surface followed by recontouring. Recontouring can include partial or full recontouring to match the natural slope gradient. Slash is often spread across the recontoured slope and existing vegetation replanted where possible. Hand crews then spread a native seed mix, an organic fertilizer, and weed seed free straw mulch. Additional shrubs from nursery stock can be planted at stream crossings or other sensitive sites to improve vegetation recovery when funding allows. Disturbance would only occur within the original road disturbance area. Areas outside the road prism and fill slopes should not be disturbed. The decommissioned roads would be removed from the forest transportation system following the decision.

Photo 2 is an example of a road recontour treatment. This photo, taken in 2010, is of a road treated in 2009 in the North Rye Creek drainage.

Photo 2: Road Receiving Recontoured Treatment



As a result of public comment regarding concern for foot/stock access on the treated decommissioned roads, treatment will allow for a foot path on recontoured roads to facilitate public or stock access, and make revegetation efforts less complicated. The pathways (and the entire recontoured road) would be seeded, fertilized and mulched. If needed, nearby rock would be used where needed to create hardened fords and allow for crossing streams without damaging stream banks or contributing sediment to streams. These would not be available to motorized travel.

Monitoring (PF-ROADS-10, ROADS-11, ROADS-12); Although a pathway is left, the project would still meet the Purpose and Need of the project because roads would be decompacted and recontoured to allow for better infiltration and vegetation growth, it would be seeded and mulched to stabilize soils, wetland and stream function would be improved at stream crossings and drainage-ways, stabilized soils would decrease sediment contributions, motorized access would be blocked by the recontoured entrance and the long-term need for the road (storage or decommission) would be determined.

Mitigation Measures
The following list includes those actions that would reduce environmental effects and improve implementation of the project (EA, Section 2.9.1 and the Fisheries Biological Evaluation Project File document SPEC-2, pages 1-2).

1. Conduct all work in a manner such that the result is as visually appealing as is practical.
2. Incorporate a foot/stock path on recontoured roads to allow for easier public travel following implementation. This path would not be available for motorized travel.
3. Follow all applicable Best Management Practices (BMPs).
4. The Montana Department of Fish Wildlife and Parks in accordance with the Montana Stream Protection Act will review this project where culverts would be removed. Prior to culvert removal or any activities that involve direct disturbance to streams, Streamside Protection Act 124 Permits would be acquired. Mitigation would include the following:
    - All in-stream work would be completed in an expeditious manner to avoid unnecessary impacts to the stream;
    - When removing culverts on live streams, divert the water around the construction site to the degree reasonable using lined ditches, coffer dams, pumps, and/or temporary pipes;
    - Precautions would be taken to preserve existing riparian vegetation;
    - All construction activities performed in the stream and immediate vicinity would be conducted in a manner to reduce in-stream turbidity along with minimizing disturbance to the streambed and/or banks of the stream;
    - All stream bank and adjacent areas disturbed by the construction activity would be protected with temporary erosion control measures. These areas would be reclaimed with long-term erosion control measures and revegetated immediately after construction;
    - When removing culverts, restore appropriate stream channel and valley bottom dimensions and gradients; if rock weirs are installed in streams, they would be designed to pass debris and substrate and not form a fish barrier;
    - The excess material and supplies would be placed in an area where they would not damage vegetation or cause erosion or sedimentation after their removal or prior to their use; and
5. Excavators would be inspected for leaks before working instream. Leaking or faulty equipment would not be used. Accumulations of oil, grease, or other toxins would be cleaned off before entering water.
6. On all disturbed areas, seed with an approved Forest seed mix and fertilize with an organic fertilizer. On recontoured areas, mulch with weed seed free straw. Areas receiving only decompaction would not be mulched but would be seeded and fertilized as needed where areas greater than 100 square feet of soil was disturbed. Place slash on disturbed sites to help minimize erosion. Trees and/or shrubs would be planted on crossings where feasible.
7. Weeds, particularly spotted knapweed, are found on some of the roads. Where covered by earlier NEPA analysis, and where spraying would provide a benefit to the revegetation efforts, these populations of weeds may be sprayed prior to decommissioning or storage.
8. Equipment would be cleaned prior to entering the project area to prevent the introduction of new weeds to the area and cleaned when entering areas without weeds.

9. Rip or decompact road surfaces where this would help restore hydrologic function. If road surfaces are not eroding and have grown in with substantial grasses, trees, or brush (natural recovery), they would not be ripped.
10. For public safety, work areas would be signed disclosing the operation of heavy equipment. Where public safety is an issue (on steep slopes with open roads below one receiving a stabilizing treatment), post lookouts or signs to alert drivers to hazards.
11. No ground disturbance or use of heavy equipment would occur in wet areas such as seeps, springs or bogs. The exceptions to this would be road prisms with boggy surfaces due to seeps and those areas where roads crossed streams or seeps with culverts. These areas would be rehabilitated.
12. The Heritage Program manager has determined that no cultural resource inventory was necessary due to low site probability and/or sufficient previous surveys. If a site was encountered, the equipment operator would be required to stop work and the Heritage Program manager notified. The site would then be avoided.
13. Plant native shrubs on sensitive recontoured areas. Stream crossings and wetland areas have highest priority.
14. Fuel storage and refueling of the excavator will not occur within 300 feet of streams. Have a spill prevention plan and materials necessary to contain a spill available on the excavator.
15. Where culverts are removed on live streams, periodically monitor the reconstructed stream crossings until the sites are stable and revegetated.
16. Remove the Forest Road 73729 culvert on Lodgepole Creek between May 15th and September 1st to minimize potential sediment impacts on bull trout spawning and rearing habitat.

17. INFISH amended the Forest Plan in 1995. The INFISH amendment to the Forest Plan established additional Forest-wide fisheries standards. These standards are listed on pages A-6 to A-13 of the INFISH EA/Decision Notice (USDA Forest Service, 1995). The INFISH standards that are pertinent to this project include:

- **RF-2** For each existing or planned road, meet the Riparian Management Objectives (RMOs) and avoid adverse effects to inland native fish by: (b) minimizing road and landing locations in Riparian Habitat Conservation Areas (RHCAs); (c) initiating development and implementation of a Road Management Plan or a Transportation Management Plan; (d) avoiding sediment delivery to streams from the road surface; and (e) avoiding disruption of natural hydrologic flow paths.
- **RF-3** Determine the influence of each road on the RMOs. Meet RMOs and avoid adverse effects on inland native fish by: (c) closing and stabilizing or obliterating, and stabilizing roads not needed for future management activities. Prioritize these actions based on the current and potential damage to inland native fish in priority watersheds, and the ecological value of the riparian resources affected.
- **RF-5** Provide and maintain fish passage at all road crossings of existing and potential fish-bearing streams.
- **RA-4** Prohibit storage of fuels and other toxicants within RHCAs. Prohibit refueling within RHCAs unless there are no other alternatives. Refueling sites within RHCAs must be approved by the Forest Service and have an approved spill containment plan.
- **WR-1** Design and implement watershed restoration projects in a manner that promotes the long-term ecological integrity of ecosystems, conserves the genetic integrity of native species, and contributes to the attainment of RMOs.

Monitoring Plans

Monitoring will consist of photo points established within one year at a variety of aspects and elevations to determine effectiveness of revegetation and need for additional revegetation efforts. These photo points could also be used to validate stream crossing restoration success and/or need for additional treatments. Monitoring efforts would be designed to allow for visits to monitoring sites to be conducted within one-to-three days. Results of monitoring will be entered into the NRIS WIT (watershed improvement tracking) database and documented in the annual Forest Plan Monitoring Report.

ALTERNATIVES NOT CONSIDERED IN DETAIL

Several alternatives were not considered in detail (EA, Section 2.7). These are summarized below.

Identify and develop ATV routes in the area. This alternative was not considered in detail because it was outside of the scope of this analysis. However, during analysis, potential ATV routes were noted, where feasible or not redundant, were proposed for storage. Storage or decommissioning of roads does not preclude consideration as an ATV route in the Travel Planning EIS currently a Record of Decision.

Leave all accessible roads open to vehicle travel. This alternative was not considered in detail because this is not a travel plan environmental analysis. It does not meet the purpose and need of the project to improve soil and water resources, and comply with the TMDL in this area by applying treatments on roads to reduce sediment sources and improve soil conditions. During field review and roads analysis the interdisciplinary team identified risks and benefits of each road and compared undetermined road locations to nearby system roads. Those roads needed for motorized access in the future will be returned to the forest road system and placed in the storage category. Treatments on road segments within this project area will address resource concerns and also accommodate any future travel management decisions that could be made in the BNF Travel Management Project EIS.

Remove culverts and harden crossings to improve water quality and reduce costs. This was not considered in detail as part of the purpose and need is to identify which roads are needed for future access and which are not because of poor road location or adjacent nearby roads and then properly identify stored and decommissioned roads in NRM-Roads. Except for hardening crossings, these actions are similar to those that would occur on the six miles of stored roads in the selected alternative that do require treatment.

Decommission all roads. This alternative did not meet the purpose and need and was not considered in detail because approximately half of the roads evaluated are needed for future access and should be stored. The intent of this project was not to eliminate access but to identify which of the undetermined roads were needed to manage the area, provide reasonable access, and improve aquatic resources. Those roads not needed would be decommissioned.

PUBLIC INVOLVEMENT

Scoping efforts included soliciting public comment as well as consulting with Forest Service personnel (EA, Section 2.3). Scoping identified specific issues of concern that were addressed during the environmental analysis of the proposed action and its alternatives. A 30 day comment period following the release of the environmental analysis allowed for interested public to comment on specifics in the EA. The responses to these comments are attached to this Decision Notice.

Notice of intention to conduct the project. A legal notice was published in the Ravalli Republic on March 22, 2010, and a scoping letter was mailed out to 205 conservation and environmental organizations; state, federal and county agencies and elected officials; and local residents and landowners. The scoping information was also posted on the Bitterroot National Forest website at http://www.fs.fed.us/r1/bitterroot/projects/nepa_project.shtml?project=30974. Errors were found in the map and a corrected map was sent on April 5, 2010 to the mailing list and the website updated; at that

time the comment period was extended to April 28. The scoping period lasted 38 days and generated twelve responses (written and phone). An interdisciplinary team (ID Team) composed of natural resource specialists and the District Ranger reviewed these letters and identified relevant issues. These issues were used to identify mitigation, modify the proposal to reduce adverse effects and increase beneficial uses.

During the scoping period the following issues were raised from external and internal comments:

- Costs, amount of active treatment should be limited to roads that really need it.
- Potential conflicts with Travel Management.
- Concern about closing any roads.
- Concern about closing roads that could make ATV routes.
- Concern about closing accessible roads.
- Requests to look for opportunities for ATV routes on these roads.
- Support for the project.
- Against the project.
- Concern that 'ripping' eliminates even foot travel.
- Concern that wildlife can't use decompacted or recontoured roads.
- Belief that the cost of obliterating roads exceeds the resource benefits.
- Belief that the proper Roads Analysis procedure was not followed.
- Belief that recontouring or decompaction increases sediment yields.
- Road and stream crossing densities in the area.
- Concern that the minimum roads analysis was not sufficient.

Notice of Completion of the EA. On July 25, 2011, a legal advertisement announcing completion of an EA and requesting public comment on the EA was placed in the Ravalli Republic (Project File). Comments were accepted for a 30-day period.

Comments and Forest Service Response. Nine comment letters were received during the 30-day scoping period. Regulatory agency direction was incorporated into the proposed action through design or mitigation (EA, page 6, 18-20).

ISSUES

The public, Forest Service personnel, and other agencies can raise issues about proposed activities. The public and external agencies usually send letters or telephone the District Ranger or a member of the project interdisciplinary team, whereas Forest Service employees may identify potential issues in the course of their duties as a member of the project interdisciplinary team. Issues raised, from the public, other agencies, and within the Forest Service, were addressed by modifying the design or timing of the proposed action, by incorporating additional information in the responses to public comment, adding information to the EA and by adding or emphasizing mitigation measures that are incorporated into the project (please refer to the FONSI, the Responses to Public Comment EA, pages 15-16). This is the strength and purpose of environmental analysis under the National Environmental Policy Act; to scientifically review a project, gain public input, and modify/implement or abandon a project based on that careful review.

The following issues were raised during the EA public comment period. These were addressed directly in the Resolution of Public Comment Table and information was added to the EA to address and/or clarify these issues. Please refer to the Public Comment Table for more detail. Some of the comments raised several times are summarized below.

Several commenters were concerned that some roads included in Alternative 2 were system roads. The following roads, 722 MP 0.00 to 0.80, 1394 MP 0.00 to 1.50, 73094 MP 0.00 to 0.86, 8177 MP 0.00 to 3.373 are National Forest System Roads open to motorized travel and are not part of this project.

Proposed actions on roads with these road numbers are on the undetermined portion of the road that is located beyond the system road sections. Those portions that are system roads and are identified in the above sections by milepost, will receive no treatment and are not a part of MCWR project. Legacy/Undetermined roads in the Martin Creek project were inadvertently removed from the National Forest System Roads due to a database glitch which has already been explained; nor do these routes appear on the 2005 Bitterroot National Forest Travel Map.

Legacy/undetermined roads in the Martin Creek project are not considered National Forest System Roads, and more importantly, none of these roads are identified by the Bitterroot National Forest as routes open to travel by motorized vehicles, nor do these routes appear on the 2005 Bitterroot National Forest Travel Map. It is the Bitterroot National Forest opinion that the roads not currently identified as National Forest System Roads in the Martin Creek watershed are closed to motorized travel, unless use existed in 2001, and then the 2001 Off-Highway Vehicle Record of Decision and Plan Amendment for Montana, North Dakota and Portions of South Dakota, or Tri State OHV EIS, is applicable. The Bitterroot National Forest acknowledges that some motorized use consistent with the Tri State OHV EIS has occurred in the project area. The Bitterroot National Forest Travel Planning Project is the NEPA process that will determine routes appropriate for motorized travel by type of vehicle and season of use for the Bitterroot National Forest, and by doing so will address user created routes as outlined by the Tri State OHV EIS.

About nineteen miles of undetermined road in modified Alternative 2 are accessible and used by motorized vehicles (EA page 5) when the inventory occurred in 2009. These roads are listed in the table below, along with the treatment that would occur with the Martin Creek Watershed Restoration Project.

Table 3

Road Number	Proposed Modified Alternative 2 Treatment	Road Number	Proposed Modified Alternative 2 Treatment
73272	Remove from project	73010	Remove from project
722	Store without Treatment	73072	Store without Treatment
73121	Store without Treatment	73016	Store without Treatment
73108	Remove from project	73008	Store without Treatment
73607	Store without Treatment	73109	Remove from project
73624	Dropped from project	73623	Already decommissioned, treat eroding stream crossing at extreme south end of road, approx. 30’

Several commenters were concerned that treatment on roads like these that are currently being used by motorized vehicles would be in conflict with decisions that would be made during the travel planning process. As a result of the appeal review and public comment, roads 73010, 73108, 73272, 73109 will be dropped from this Decision.

Public comments regarding concern for foot/stock access also lead to the decision to include a foot path on the 15 miles of decommissioned road that would have a full recontour. A narrow foot path would allow for easier travel by foot or stock on the recontoured decommissioned roads. Recontouring and decompaction of the road surface will allow for improved infiltration and revegetation.

FSDR 722 would be stored without treatment after milepost 0.8. The first 0.8 miles of FSDR 722 is a system road and is not affected by this decision.

Issues were raised about the minimum roads analysis completed on this project. After reviewing comments and discussing the analysis in depth with transportation planners, we determined that a minimum roads analysis was not completed for the entire project area, however identification which undetermined roads are needed and which could be decommissioned is a step towards that minimum roads analysis. The land served by the undetermined roads are mostly located in Management Area 1, timber emphasis, MA 2, big game winter range and roads are needed to access and manage these lands.

With the Martin Creek Watershed Restoration Project we did do an analysis of the undetermined roads in the project area to determine those that were needed for long-term access and those whose function was duplicated by another road or were not needed for future access. The decision whether a road was to be stored or not was partially based upon the presence of system roads nearby. Due to public comment, we expanded this analysis to include system roads in the project area that were major travel routes and documented the results in a Roads Analysis is located in the project file as Road-007. Other recent projects have looked at roads in this area and also made decisions as to which roads were needed or which could be restored and this includes Middle East Fork (2005), Burned Area Recovery (2001), Paint, Reynolds, Lick (1992), Meadow, Mink, Springer (1996).

There was also public concern with costs of implementing such a large project. Fortunately 89 miles of the roads in the MCRW project, need no additional treatment and the only change to them would be codes in the transportation database or NRM-Roads to identify them as stored or decommissioned.

Costs are estimated in Section 2.9 of the EA with storage estimated at $1,900/ mile and decommissioing

at $2,200-4,500/ mile. The forest believes this cost appropriate to store and decommission roads and to protect and improve forest resources. We are pursuing a partnership with Trout Unlimited to help implement this project and reduce the cost to the federal government.

Several commentors cited lack of monitoring to document effects of this type of project on national forest lands and water. Actually monitoring of this type is common and occurs at the research level as documented in Sections 4.2.1 and 4.2.2 of the EA. Local monitoring also occurs by fisheries biologists and hydrology personnel and is documented annually in Forest Plan monitoring reports. Also, many of these roads were initially reviewed in 1994 and comparison of conditions then and now show that conditions have improved and impacts to water quality reduced after implementation of a watershed improvement project in 1995 on a subset of the roads in this project (PF-WAT-20). Two recent monitoring reports have been included in the Response to Public Comment. Findings show that these treatments do improve vegetative cover and allow for improved fisheries habitat.

The Forest Service found no significant issues or significant unresolved conflicts concerning alternative uses of available resources that warrant detailed consideration of additional alternatives.

REASONS FOR THE DECISION

I chose a modified Alternative 2 as documented in Table 1 because it meets the purpose and need of the project and is consistent with the Bitterroot Forest Plan as amended by INFISH (EA, Sections 1.7, 4.2.1, 4.2.2, 4.3.1, 4.3.2, 4.3.4, 4.3.6; FONSI, page 2 and 4). It also meets the intent of the Bitterroot Headwaters TMDL (EA, Section 1.3) to reduce sediment from forest roads.

I also based my decision on the following considerations:

This analysis will identify those undetermined roads to be returned to the transportation system to manage the National Forest lands affected by the roads in this project area (EA Section 2.9).

The activities proposed in this project will comply with direction identified in the Water Quality Restoration Plan and Total Maximum Daily Loads for the Bitterroot Headwaters Planning Area and the Forest Plan by reducing erosion and sediment sources in the East Fork Bitterroot River watershed (EA Section 1.7).

Impacts to ESA listed fish species (bull trout) will be limited in scope and duration, may affect small numbers of individuals, and will be offset by long-term benefits to the local populations that will commence almost immediately after a culvert is removed and/or crossings restored (EA, Section 4.2.2, FONSI, page 5). For bull trout, the ESA determination of effect is “MAY EFFECT LIKELY TO ADVERSELY AFFECT” because of short-term sediment impacts. Sediment produced by road decommissioning or road storage is not likely to jeopardize the continued existence of bull trout or result in destruction or adverse modification of critiacl habitat (EA, Section 4.2.2, 45, PF-SPEC-4).

For westslope cutthroat trout, the project determination for Alternative 2 is “MAY IMPACT INDIVIDUALS OR HABITAT, BUT WITH NO LOSS OF VIABILITY OR TREND TOWARDS FEDERAL LISTING” in the short-term, and “BENEFICIAL IMPACT” in the long-term. Viable populations of westslope cutthroat trout would be maintained at both the project and Forest-wide scales (EA, Section 4.2.2).

For western pearlshell mussel, the project determination for Alternative 2 is “NO IMPACT” in the short-term, and “BENEFICIAL IMPACT” in the long-term. Implementation of Alternative 2 is unlikely to cause sediment deposition in any areas where mussels are known to occur (lower Cameron Creek) or where suitable habitat is thought to be present. In the long-term, although direct habitat improvements may be difficult to demonstrate or measure, the improved watershed health and water quality produced by Alternative 2 would be beneficial to the western pearlshell mussel (EA, Section 4.2.2).

The road storage and decommissioning were determined by the project wildlife biologist to have "No Effect" on the gray wolf. The project determination for Canada lynx, a threatened wildlife species was "Not likely to Adversely Affect"(EA, 4.2.3, FONSI, page 5).

A Biological Assessment has been completed for sensitive wildlife species (EA, Section 4.2.3). For the boreal toad, wolverine, and fisher, the determination is "May Impact Individuals or Habitat, No Impact on Population" in the short-term, and overall gain in security in the long-term (EA, Section 4.2.3). For the rest of the sensitive wildlife species, the determination is "No Impact" (EA, Section 4.2.3). Viable populations of sensitive wildlife species would be maintained at both the project and Forest-wide scales.

Incorporating the mitigation measures in Section 2.9.1 of the EA will limit the scope, duration, and impact of sediment production on fish and amphibians.

The project will have no impact on threatened, endangered plant species because none are known to occur on the Forest (EA, Section 4.3.4) project will have "no impact" on sensitive plant species (EA,Section 4.3.4).

The project will not have an adverse affect on cultural resources (EA, Section4.3.5).

The project will have no effect on wilderness or roadless areas as no activies are planned in roadless or wilderness areas (FONSI, page 3). All activities will take place on existing road prisms.

I did not choose the "no action" alternative (Alternative 1) because it does not meet the purpose and need for the project. It does not resolve the undetermined road issue, doesn't meet the Forest Plan guideline to reduce sediment from existing roads and doesn't comply with direction in the Bitterroot Headwaters Restoration Plan.

Map 2 (shown on next page) displays the road system in the project area as a result of this decision.

Map 2
Martin Creek Watershed Restoration Project
Post Implementation Road System

mgw, 1/10/2013

Legend

Roads Stored with this EA

Existing System Roads

0 0.35 0.7 1.4 2.1 2.8
Miles

N

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

As required by the National Forest Management Act, this decision is consistent with the Bitterroot Forest Plan (1987) as amended by INFISH.

I have reviewed this decision for compliance with laws, regulations, and policies. My decision is consistent with all laws, regulations, and policies. Findings required by major environmental laws, the Forest Plan, and the Environmental Justice Executive Order are summarized below. Compliance with other laws, regulations, and policies are listed in the EA, the Project File, and the Forest Plan. In the event of any map or data errata, errors, in this significant quantity of analysis is found; we will correct the maps and data errors without further environmental analysis.

Consistency with the Forest Plan (16 U.S.C. 1604(i)): The Bitterroot Forest Land and Resource Management Plan, as amended by INFISH, establishes management direction for the Bitterroot National Forest. This direction is described in forest-wide and management area-specific standards and guidelines. Designing and implementing projects consistent with this direction is the means to move the Forest toward the desired future condition as described in Chapter II of the Forest Plan. Management area and forest-wide direction in the Forest Plan established sideboards for the development of alternatives to the proposed action while responding to public issues. NFMA requires all resource plans and projects to be consistent with the Forest Plan's standards, guidelines, management area goals, and objectives. After reviewing the EA, I find my decision is in full compliance with the Bitterroot National Forest Land and Resource Management Plan standards, guidelines, goals, and objectives, as amended by INFISH (EA, Section1.3, 1.7, 2.91, 4.2.2).

Sensitive Species: The Regional Forester approved a list of sensitive plants and animals on October 28, 2004, for which population viability is a concern. In making my decision, I considered the effects on all sensitive species that possibly occur on the Bitterroot National Forest and in the project area. I reviewed the analysis of the predicted effects on all sensitive species that may possibly occur in the analysis area (EA,) Biological Evaluations (Fisheries) PF-SPEC-2 and 4, and Wildlife in the EA, Section 4.3.3 and 4.3.4). Based on the available information on the distribution, presence or absence in the project area, habitat requirements, and management strategies for these species, as well as the project design and location, implementation of the proposed action will not have a significant impact on any of the sensitive species. I concur with the findings documented in the EA (EA, Section 4.2.2, 4.3.2, 4.3.4), FONSI (page 5-6), and the Biological Evaluations for fish (Project File Document 2), wildlife (EA, Section 4.3.3).

- **National Forest Management Act (NFMA):** On April 9, 2012 the Department of Agriculture issued a final planning rule for National Forest System land management planning (2012 Rule) 77 FR 68 [21162-21276]). None of the requirements of the 2012 Rule apply to projects and activities on the Bitterroot National Forest, as the Bitterroot Forest Plan was developed under a prior planning rule (36 CFR §219.17(c)).

  Furthermore, the 2012 Rule explains, "[The 2012 Rule] supersedes any prior planning regulation. No obligations remain from any prior planning regulation, except those that are specifically included in a unit's existing plan. Existing plans will remain in effect until revised" (36 CFR §219.17).

National Environmental Policy Act (NEPA): My decision is in full compliance with NEPA. Pertinent NEPA provisions at 40 CFR 1500-1508 have been followed in the development of the Martin Creek Watershed Restoration EA and FONSI. The EA provides sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. In the FONSI (pages 2-6), I presented the reasons why I found the proposal will not have a significant effect on the human environment and, therefore, why an environmental

impact statement will not be prepared.

Endangered Species Act: Modified Alternative 2 complies with the Endangered Species Act. Bull trout consultation was completed under a programmatic agreement - the *2008 Biological Opinion of the Effects to Bull Trout and Bull Trout Critical Habitat from Road Management Activities on National Forest System and Bureau of Land Management Lands in Western Montana.* The Biological Opinion allows beneficial road-related projects such as culvert replacements and removals to proceed without individual consultations as long as they incorporate certain sediment mitigations and timing windows (EA, Section 4.2.2; FONSI, pages 2, 4; Project File documents 2 and 4). Those mitigations have been incorporated into this project (EA, Section 2.9.1, 4.2.2; FONSI, page 5). Alternative 2 will have "no effect" on the federally listed grey wolf and "Not Likely to Adversely Affect" on the Canada lynx (EA, Section4.3.2; FONSI, page 5).

Clean Water Act and Montana State Water Quality Standards: Modified Alternative 2 complies with the Clean Water Act and the Bitterroot Headwaters TMDL (EA, Section 4.2.1, FONSI page 4). Best management practices would be used to minimize short-term sediment inputs, and beneficial uses (the cold water fishery) would be enhanced (EA, Section 2.9.1).

National Historic Preservation Act: Modified Alternative 2 complies with the National Historic Preservation Act (EA, Sectin 4.3.5; FONSI, page 3). All road locations have been previously disturbed and proposed work would occur within previously disturbed areas. The potential for new site discovery is low and the Forest's Heritage program manager has determined that no additional survey is needed. (EA, Section 4.3.5; FONSI, page 3, PF-SPEC-1). No excavation would occur outside of the previously disturbed area (EA page Section 2.9, 4.3.5).

Environmental Justice Order: Executive Order 12898 requires fair treatment and meaningful involvement of all citizens regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. We have treated all citizens fairly and allowed meaningful involvement to every person regardless of race, color, national origin, or income. I find that this project and its NEPA analysis comply with the Environmental Justice Executive Order (EA, page 48-59).

APPEAL PROVISIONS AND IMPLEMENATION

This decision is subject to appeal in accordance with 36 CFR 215. As stated in 36 CFR 215.11, an appeal may be filed by any person or non-Federal organization (Federal Agencies may not appeal). A written Notice of Appeal must be submitted within 45 days after the date that notice of this decision was published in the Ravalli Republic, Hamilton, Montana.

Appeals should be sent to:

USDA, Forest Service, Northern Region
ATTN: Appeals Deciding Officer
PO BOX 7669
Missoula, MT 59807

Appeals can be sent electronically to appeals-northern-regional-office@fs.fed.us.

Appeals must meet content requirements of 36 DFR 215.14. Detailed records of the environmental analysis are available for review at the Sula Ranger District, 7338 Highway 93 South, Sula, Montana, 59871; or online at http://www.fs.fed.us/nepa/fs-usda-pop.php/?project=30974
If no appeal is received, implementation may occur on, but not before, five business days from the close of the appeal filing period. If an appeal is received, implementation may not occur for

15 days following the date of appeal disposition. In order to comply with regulatory direction, the culvert removal on FSDR 73279 must occur between May 15th and September 1st unless the timing window is waived by the U.S. Fish and Wildlife Service and Montana Department of Fish, Wildlife, and Parks. Other work could occur as schedules and funds permit.

CONTACT PERSON:

Copies of the Martin Creek Watershed Restoration EA may be requested by contacting the Sula Ranger District Office at (406) 821-3201 or on the web at: http://www.fs.fed.us/nepa/fs-usda-pop.php/?project=30974

For more information or questions concerning this decision, please contact Chuck Oliver, Acting Sula District Ranger or Marilyn Wildey, ID Team Leader, at 1801 North First, Hamilton, MT 59840 or (406) 363-7101.

Charles T. Oliver

Dec 10, 2013
Date

Martin Sleeping Child Comments
RESOLUTION OF EA COMMENTS

LETTER NUMBER AND SOURCE:

Letter #1 Montana Fish Wildlife and Parks	Letter #6 Ravalli Co. Off Road User Association
Letter #2 tpaddock	Letter #7 Jim and Marsha Waliser
Letter #3 Mike Jeffords	Letter #8 Dan Thompson
Letter #4 Wildlands CPR and FOB	Comment #9 Kirk Thompson
Letter #5 Dean and Betty Frost	

The numbers reported in the Resolution of EA Comments do not reflect changes to the proposed project (such as when a road was removed from the project) that occurred as the result of public comment when the Decision was made on January 10, 2013.

IMPORTANT Definition: "undetermined roads": these roads were previously categorized as "historic" or "legacy" roads and were part of the BNF road system database. These roads are overgrown, with only incidental use in most cases. The new database category "undetermined" placed all of these "historic" "legacy" roads in a type of limbo by removing them from the BNF road system database without analysis. This EA takes a hard look at these "historic"/ "undetermined" roads and either puts them back into the system as stored or removes them the BNF road system through the category decommissioned. For the purpose of the response to comments the word "undetermined" will be used interchangeably with "historic" or "legacy" to ensure the commenter is aware that these are historic typically gown over roads. R. Wooding-DR

IMPORTANT TO NOTE: Based on the comments we received I decided to ensure any "undetermined" road, or road segment, that had travel on it during field surveys of 2009 would be left accessible, please see the decision for a list of the applicable roads. This eliminates the risk of conflict with Travel Planning. Roads have been cross-checked with Travel Planning to ensure that treatments proposed with the Martin Creek Project do not conflict with that planning effort. R Wooding- DR

Letter Number – Comment Number	Comment	Response
1	We continue to support this project, which would	Project support

Letter Number – Comment Number	Comment	Response
	help reduce road-sediment sources	
2-a	Roads do not need to be closed to 4-wheeler use. We have already lost too much recreation use roads already. Those roads are a good place to gain access to archery hunt using a 4-wheeler to access the area.	Against proposed action. Please see the map included in the Decision Notice; this map displays all roads that would be in the Road Modules of the Natural Resource Manager Database (or Database) and response to Comment 6-o. Also refer to the EA, pages 2, 22, 50-53; this decision will not identify the type of travel appropriate for motorized travel. That decision will be made with Travel Planning.
2-b	Tearing the road up.. does more damage and erosion than leaving it. The whole watershed crap study doesn't pertain to the BNF.	Please refer to page 5 of the EA. There are a total of 121 miles of road proposed for some action with this project. Fifty-nine miles would be stored, sixty-three miles decommissioned. Of the 59 miles of stored roads, Forty-six miles, are recovering naturally or have already been treated and would receive no additional treatment with this project; 13 miles would receive treatment. These roads would be identified in the Database as 'stored' instead of "undetermined" as they are currently coded. Of the 63 miles that would be decommissioned, only twenty miles need additional treatment and the remainder would be coded as decommissioned in the Database. The amount of ground disturbance that would occur on the roads proposed for storage would be less than would occur on roads proposed for decommissioning. Storing roads includes recontouring the entrances and drainages at crossings, removing the crossings, and decompaction of the road surface. The crossings are removed and the road surface and drainages are recontoured on decommissioned roads. Refer to pages 18-19 for photos of typical work that would occur in the area. (EA, p.5). Research has studied effects of roads treated for watershed restoration and findings are documented in the following articles: Madeij, 2001; Luce, 1997; Luce and Wemple, 2001; Luce, 2002; Switalski, et al, 2004; Foltz and Yanosek, 2004; Foltz et al, 2007. This research has found that the type of work proposed in this project improves infiltration, plant colonization, vegetation cover, and reduces erosion. In addition, local monitoring of restoration

Letter Number – Comment Number	Comment	Response
		projects on the BNF are documented in the Forest Plan Monitoring Reports (2007 and 2008, Items 22 and 19) and refer to effects from the implementation of similar projects. See also the monitoring reports included at the end of this document and PF-WAT-16, a portion of which is also included below.
3-a	Several roads that were discussed as possible ATV routes and listed in the travel plan are now listed for treatment. Travel Plan (TP) has not been finalized and rds 722, 73008, 73094, 5790, 73264, 1394, 73624, 73623 should be removed from the EA as this would be a violation of NEPA. …and is in conflict with the ongoing travel planning process	One goal of the Project is to avoid conflict with any decisions that will be made with the Record of Decision, ROD, for the Bitterroot NF Travel Plan Environmental Impact Statement (EA p. 11, 12, 46 , 51), and proposals have been cross-checked with that planning effort (PF-WAT-24). Undetermined roads in the Martin Creek EA that were noted as being traveled upon in 2009 and proposed for treatment will have an OHV accessible route left following implementation of the proposed treatment. Please see the table in the Decision Notice for those roads that would receive this treatment. The Purpose and Need of the Project includes identification of which "undetermined" or "legacy" roads are needed for future management (EA, page 1 and 2). These will become stored and coded correctly in the roads database. This Project does not address motorized travel on Forest System roads or trails, the BNF Travel Plan EIS, will addresses the type of travel Bitterroot National Forest Roads and Trails will receive (EA, page 2). Below is a description of modified Alternative 2 proposals for those roads listed in the comment: <u>Road 722</u>: the first section, MP 0.0 to MP 0.8, is a forest system road and would receive no treatment, the second section MP 0.80 to MP 4.60 currently is "undetermined" and was decompacted in the 1990s yet motorized use was occurring on this road in 2009. In the roads analysis process, this section of road was identified as needed for future vegetation management. The Martin Creek EA places the second, undetermined section of the road back on the National Forest System Roads Inventory, as

Letter Number – Comment Number	Comment	Response
		a stored road. There will be no direct treatment of the road. Road 5790 was scarified in the 1990s and its' status in the Database is 'decommissioned'. The Jennings Camp end was opened to allow for hauling and skidding as part of Burned Area Recovery and was restored following use. No motorized use was occurring on this road in 2009 according to the field inventory. Roads analysis identified a need for this road in the future and this project would change the status of this road to stored without additional treatment. Road 73008 This road would be stored, no treatment is planned. Road 73094 This road would be stored, no treatment is planned. Road 73264 Review of Meadow Mink Spring Watershed Restoration Project decided this road was to be stored and so this road will be dropped from the Martin Creek Watershed Restoration Project. Road 1394 This road is mostly located on the Darby Ranger District and will be dropped from this project. Road 73623 has one crossing on Bugle Creek where steep unvegetated banks erode directly into the stream. This crossing would be repaired to reduce erosion, no other treatments are planned for this road. Road 73624 was decompacted and blocked in 1996 with the Meadow, Mink, Springer Watershed Restoration Project, it will be dropped from this project.
3-b	FWP did a study on fish in the Martin Cr watershed, Bull Trout were found in all but one creek. Westslope Cutthroat Trout were found in all creeks and surveys for pearl mussel were no completed. Yet FWP and BNF conclude that roads in project area are causing a negative impact. How is this possible when BT and WCT were found in all creeks and the mussel survey not completed? This	It is incorrect to assume that roads do not adversely impact habitat just because bull trout and westslope cutthroat trout are present in all of the creeks. Both species are capable of surviving in less than ideal habitat conditions to varying degrees, particularly when non-native trout species are not present, with westslope cutthroat trout being more tolerant of degraded habitat conditions than bull trout. The U.S. Fish and Wildlife Service (USFWS) is the entity tasked with recovering the bull trout and eventually getting them off of the Endangered Species list. In March 2010,

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	is shoddy misinformation.	USFWS biologists reviewed the habitat conditions in the Martin Creek watershed and concluded that several of the watershed health habitat components are currently functioning at an unacceptable risk (FUR) to bull trout (USDI Fish and Wildlife Service, 2010; also refer to Table 7 on EA page 28). Those FUR habitat components include: (1) road density (existing condition is 2.9 miles of road per square mile; preferred condition is < 1 mile of road per square mile); (2) percent of perennial stream length within 300 feet of roads (existing condition is 19%; preferred condition is < 10%); and (3) the number of road stream crossings (existing condition is 13 crossings; preferred condition is < 5 crossings). All three of the FUR habitat components would be improved by this project. Having a high road density (2.9 miles per square mile), a large number of road stream crossings (13), and 19% of the perennial stream length located within 300 feet of a road certainly has at least some negative impacts on fish habitat quality, primarily via increased runoff and sediment delivery during storms and cumulative and incremental increases in water temperatures caused by reductions of intact riparian shade near streams. USFS biologists have been monitoring water temperatures in the Martin Creek drainage for nearly 20 years and have observed a gradual but steady increase in water temperatures. The large number of road stream crossings and the considerable length of perennial stream located within 300 feet of roads have resulted in considerable reductions in riparian shade cover near streams. Those shade reductions, which are widely scattered throughout the Martin Creek drainage, cumulatively contribute to warmer stream temperatures. If current warming trends continue, much of the habitat in the Martin Creek drainage that is currently occupied by bull trout could become unsuitable in the next couple of decades. Those are the reasons why we believe that roads are having at least some negative impact on fish habitat conditions in the Martin Creek drainage. As for the western

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		pearlshell mussel, presence/absence surveys have not been conducted by USFS biologists in the Martin Creek drainage, but most of the habitat in the drainage is likely unsuitable due to steep gradients and large substrates (see Table 6 in the EA). In 2007, USFS biologists surveyed for mussels in the East Fork Bitterroot River near the mouth of Martin Creek, but none were found (Table 6). It is our belief that roads are probably not having much of an effect on the western pearlshell mussel because the species has a low likelihood of occurring in the Martin Creek drainage.
3-c	As for roads that might be contributing sediment, has the agency looked at removing culverts and hardening crossings to improve water quality.	I appreciate your comment and concern. Because of this duly noted input we reviewed the feasibility of this alternative. As a result, we discussed this option and decided that it didn't meet the purpose and need (EA, page 13). This was not considered in detail as part of the purpose and need is to identify which roads are needed for future access and which are not because of poor road location, or adjacent nearby roads and then properly identify stored and decommissioned roads in the transportation database. The actions proposed by the commenter are similar to those that would occur on the 13 miles of stored roads in Alternative 2 that are proposed for treatment. Additional levels of treatment would occur on 20 miles of road that are not needed for future access and are proposed for decommission; no treatment is proposed on the remaining 89 miles of road in this Project. Please refer to the Chapter 4 discussions for individual resources on pages 37-56 of the EA.
3-d	Decommissioning costs, too much. What is the cost of shoulders pulled, culverts removed, creek crossings armored? How much will it cost to block the other 158 roads that are not being recontoured?	Expected costs are displayed in the EA on page 18. Storage, with treatment, is proposed for 13 miles of road and is estimated at $1,900/mile; this would include things like restoration of crossings, some decompaction, areas of recontouring and costs would be similar to that of pulling

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		shoulders, removing culverts, and armoring crossings. The total cost for storage is estimated at $24,700.Decommissioning is estimated at $2,200-4,500/mile (total cost estimated at $44,000 – 90,000) and is proposed on 20 miles of road (EA, page 10). Decommissioning costs are displayed as a range because actual treatment on a road proposed for decommissioning could vary from something similar to storage to a full recontour) depending upon specific site conditions. These cost estimates are based upon similar work completed on the BNF in 2009 and 2010. The actual type of work done on a decommissioned road at implementation would depend upon budgets and the condition of each road. Refer to page 17 of the EA for description and photo examples of the types of treatment proposed. The remaining 89 miles of roads, that are identified as "No Treatment Needed" require no additional work to meet the purpose and need, only the Database would be changed to reflect this proposal. These roads need no additional work on the ground, because they are recovering naturally or have already been treated (EA, p.10).
3-e	Has the agency done a thorough monitoring study of past recontoured roads? Has there been any study as to how long soils take to stabilize after re-contouring, or what sort of weed plan is being considered?	Yes, there have been studies to determine the effects (both beneficial and adverse) of road restoration treatments. Please see the discussions and literature sources listed in EA pages 39-40, 43-45. These sources are listed in the bibliography, Appendix B-1 and there are many literature sources available on the internet. Other sources of information are listed in the response to Comment 2-b. We also do local monitoring of road storage and decommissioning projects to determine effectiveness, how we could better implement and need for additional seeding. Project File document WAT-16, is a PowerPoint display of the changes in roads following decommission or storage 1 to 2 years after implementation. There is also a fisheries monitoring report and a portion of WAT-16 attached at the end of this document to help address this comment. Weeds: Page 34 of the EA discloses that few sites in the analysis area are

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		covered by previous weed EAs or EISs. Equipment would be cleaned prior to entering the project area to prevent the introduction of new weeds to the area and cleaned when entering areas without weeds; this mitigation was included page 20. To reduce the growth of weeds on disturbed areas, disturbed areas will be seeded as soon as possible after the work is completed. Monitoring post-road decommissioning indicates in the first two years weeds were common on the recontoured areas and reflect vegetation (weed) composition in adjacent areas; the recontoured areas looked like those that were not treated. After several years, the seeded grasses and forbs compete well against the weeds and we find the recontoured roads are ribbons of less weedy vegetation across the hill slopes (2009 Forest Plan Monitoring Report Item 19).
3-f	As I see it right now the EA is making travel management decisions and I believe this is conflicting with the ongoing travel management process. I feel that the value of recreation is not fully being looked at in the EA. I would ask that the agency reconsider the above mentioned roads for reevaluation.	Please see the response to Comment 3-a, 6-a, 6-b, 6-n, and 7-a for discussion concerning those roads that have segments identified as system roads and other segments that are undetermined. Several miles of road were deferred to avoid conflicts with travel management following scoping (EA page 1) or placed in storage (PF-Roads-1). Those roads that were receiving motorized travel in 2009 and have a treatment proposed would be left with an OHV accessible route to avoid potential conflict with Travel Management. Please refer to the Decision Notice for a list of affected roads.
3-g	I would respectfully ask that the agency do a revised EA for this project. As it stands now, I feel this action will require an EIS because of significant impacts to recreation, water sheds and fisheries.	Effects to watersheds, fisheries and recreation are disclosed In the EA, Chapter 4. We took a hard look at the comments we received which prompted further analysis. We added to the EA additional discussion points related to motorized access, Section 4.2.3 of the EA. Map 5, included in the Decision Notice shows the road system that would be available following the decision. [See also the response to Comments 6-o and 8-f].

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		After careful review of the EA, and Public Comment, I have made a finding of No Significant Impact, FONSI. I believe the decision made with this project significantly improve the resources within the Martin Creek EA area of analysis. Because this EA carefully avoids pre decision of the BNF Travel Plan EIS, recreational access will not be determined with this EA but rather on the roads traveled on as of 2009 within the project area, the travel will be determined at a later date by the ROD for the BNF Travel Plan EIS.
4-a	More work is still needed to properly identify the minimum road system and decommissioning opportunities in the project area.	We appreciate this comment and made the decision to complete additional analysis to evaluate system roads that provide access to and complement the analysis for the future need of the undetermined roads. This information is included in the project file as PF-ROADS-1 as it updated the Risk Benefit Table for the Roads Analysis, (PF-ROADS-4), and added information to the EA in Section 3.4. In the EA, we mistakenly claimed that when this project was completed we'd have identified the minimum roads necessary to manage these lands. Instead, we should have stated , and then amended the EA to reflect "*that project completion would identify which undetermined roads were needed to provide access for future forest management*" (EA, Section 1.3) This would bring the forest one step closer to identifying the minimum road system necessary for management of the national forest within the project boundary, by storing those roads needed for future management and decommissioning those roads not needed for future management. In the EA, page 1, the purpose of the Proposed Action is to determine the future need for abandoned timber roads classified as "undetermined" or historic "legacy" roads, return necessary roads back into the transportation system and to decommission and remove from the transportation system roads not needed for future

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		forest management.
4-b	We do appreciate efforts to reduce road densities and comply with Subpart A of the Travel Management Rule but key components are missing. The FS memorandum dated November 10, 2010 provides direction for meeting regulatory requirements and we urge the BNF to complete a thorough travel analysis before claiming compliance with Subpart A. …The EA states "The pa identifies the minimum road system necessary for management of the national forest within the project boundary." We take great issue with this statement because no adequate travel management analysis and the associated report were completed for the project area.	See response to comment 4-a, above and Section 3.4 of the EA
4-c	We still support a decision that reduces road impacts in this area.	Thank you.
4-d	Identifying the minimum road system and decommissioning opportunities is a distinct and separate process than implementing it through specific projects; therefore the level and scope of analysis will be different.	We appreciate your opinion; however, our determination is based on a different set of criteria, please see Comment 4-a above. The Purpose and Need of this project is to identify which undetermined roads are needed for future management and identify them correctly in the Database. As a result of comments like this, additional analysis was completed and is included in PF-ROADS 1 and 4 and in the EA, Section 3.4
4-e	A spreadsheet on its own does not constitute a travel analysis report that is supported by science based analysis. The review (of each road) by various	We have conducted a small scale "Roads analysis" for this project it is intended to be scientifically based. That is, analysts should locate, correctly interpret, and use relevant existing scientific literature in the

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	specialists does not constitute a science based analysis.	analysis. Any assumptions made during the analysis, are disclosed and reveal the limitations of the information on which the analysis is based. The Martin Creek EA Roads Analysis is based on: Use of the best available scientific information about ecological effects of roads on terrestrial and aquatic ecosystems at appropriate scales(EA, Chapter 4 and Appendix B of the EA, Comment 2-b, PF-WAT 16 and 17-monitoring reports included at the conclusion of this document); Economics of constructing, reconstructing, maintaining, and decommissioning roads (EA, page 19); Social and economic costs and benefits of roads (EA, Section 4.2.3); Contribution of existing and proposed roads to management objectives (PF-ROADS-1 and 4). The effects of roads on the various resources-both beneficial and detrimental (PF-ROADS-1 and Chapter 4 of the EA).
4-f	Besides the question of what constitutes a science based analysis we have serious concerns regarding the scope of the analysis.	Opinion, no response necessary.
4-g	Even if the BNF did not choose to identify the minimum road system and decommissioning opportunities in this project, it still must conduct travel management on roads proposed for addition back into the transportation system.	36 CFR 212 Subpart A – Administration of the Forest Transportation system, and 36 CFR Subpart B – Designation of Roads, Trails and Areas for Motor Vehicle Use are two distinct and separate processes that can be accomplished independently or concurrently. There is no requirement that they must be accomplished at the same time in the same project. In the EA, Section 1.2, background for this project analysis is provided. The roads in this project are already constructed and a database error resulted in incorrect codes for the historic 'undetermined' roads. One of the reasons for this project (EA, page 1) is to determine the long-term need/use and correctly code the undetermined roads in the Database. See also response to comment 4-h. Travel planning is a separate process that is under consideration at this time.
4-h	Since the Martin Cr EA claims to have identified	See response to Comment 4-a. This Project focused analysis on

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	the minimum road system and decommissioning opportunities in the project area, travel analysis should have been completed that includes all system roads. In order to identify the minimum road system and decommissioning opportunities, travel analysis must at least include all system roads in addition to other routes deemed important. The risk benefit table contained only undetermined roads…were there no system roads that could be decommissioned?	undetermined roads and identified which were needed for future management and access. Although not all National Forest System Roads within the project area were analyzed in this EA for future Forest management needs many have been covered in previous decisions. Paint Reynolds Lick DM, and Middle East Fork Hazardous Fuels EIS addressed future management needs on many of the current National Forest System Roads within the project area. This analysis focused on those roads where future need was not clear. As a result of your comments, we conducted additional analysis to evaluate the need for roads that provide access to and compliment the undetermined roads that would be stored with this project. This information was added to the EA in Section 3.4 with supporting information in PF-ROADS-1 and 4. We concur that this EA will not identify the minimum road system needed to manage forest land within the project area, but brings us closer to that goal. (EA, page 1). System roads being address with travel planning,. This project purpose and need was to determine the future need for the historic roads that have been abandoned and are classified as undetermined (EA p. 1). See also response to Comment 4-g and 4-h.
4-i	Until appropriate travel analysis has been completed, the forest cannot claim to have identified the minimum road system and all decommissioning opportunities for the project area. … If the BNF simply wants to add undetermined roads to the transportation system, then it must still complete travel analysis for those roads.	Although not all National Forest System Roads within the project area were analyzed in this EA for future Forest management needs many have been covered in previous decisions. Paint Reynolds Lick DM, and Middle East Fork Hazardous Fuels EIS, Lyman Creek EA addressed future management needs on many of the current National Forest System Roads within the project area. This analysis focused on historic/grown over roads where future need was not clear. We concur that this EA will not identify the minimum road system needed to manage forest land within the project area, but bring us closer to that goal. See also response to Comment 4-a, 4-g and 4-h.
4-j	The BNF can issue a decision to implement all the	Although not all National Forest System Roads within the project area

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	treatments in the Martin Creek EA pa without completing further travel analysis. It can do this as long as the decision does not claim to add these roads to the transportation system or that the EA identifies the minimum transportation system and decommissioning opportunities.	were analyzed in this EA for future Forest management needs many have been covered in previous decisions. Paint Reynolds Lick DM, Middle East Fork Hazardous Fuels EIS, and Lyman Creek EA addressed future management needs on many of the current National Forest System Roads within the project area. This analysis focused on those roads where future need was not clear. These roads were on the forest transportation system at one time and have system numbers assigned to them. Due to coding errors and the actions of previous decisions that were not well documented in the Database these "historic" "legacy" roads were identified as "undetermined". This Project is an effort to review these roads that exist on the landscape, conduct a roads analysis to determine which are needed for future access or management, and treat any areas that are contributing to decreased water quality, soil quality, reduced wildlife or fisheries habitat (EA, Sections 1.3, 1.4, 1.5. We concur that this EA will not identify the minimum road system needed to manage forest land within the project area, but brings us closer to that goal. Refer also to the response to Comment 4-a and 4-h.
4-k	If BNF does complete travel analysis to either add undetermined roads to the system or to fully comply with the WO memo: [FS memorandum dated November 10, 2010 that provides direction for meeting regulatory requirements] we do feel more decommissioning is needed. We also urge that all 28 miles of road removed due to overlap with travel planning be added back into the pa, especially any that need treatments due to soil/water concerns.	See response to Comment 4-a, 4-g and 4-h and the EA Sections 1.3, 1.4, 1.5. One purpose of this project is to edit coding in the Database to more accurately describe a roads purpose on the land (EA, page 2), no roads would be opened to allow travel. Twenty-four miles of roads initially scoped are located on the Darby Ranger District, these were removed from this project to include only those roads located on the Sula Ranger District (EA, page 1). The remaining are roads where mileage was incorrectly identified or a portion of them was a system road, (EA, page 1). This project is not intended to manage travel. Please refer to Comment 4-a, 4-h and 4-g.
4-l	722, more effective closures should be added	See WAT-8, ROAD-1, and also response to Comment 3-a. The first 0.8 miles of FSDR 722 is a forest system road and would receive no treatment.

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		The road would be stored beyond that. This section is not proposed for treatment because the field inventory indicates good vegetation despite limited ATV use which would be managed through travel planning and not this analysis and decision. The present condition is appropriate for a stored road.
4-m	13324, dropped from Alt 2, should be decommissioned and stored.	Between scoping and release of the EA, roads not located in the East Fork Bitterroot Watershed were dropped from this project and added into the Darby Lumber Lands project for analysis. 13324 is not in the East Fork but in Sleeping Child Creek and so is outside the scope of this analysis.
4-n	73008, spreadsheet states treatment required, but store-no treatment in Alt 2	Refer to WAT-8, ROAD-1, a decision on 73008 will be deferred until Travel Planning is completed.
4-o	73016, storage-no treatment but should be treated to ensure it is properly closed and inaccessible	Please refer to WAT-8, ROAD-1, 73016 was identified for storage-no treatment due to roaded recreation and vegetation or fire access needs. The effect this road was having on water, fisheries and wildlife was rated as low. Field inventory notes state the road is overgrown with cenothus and 30 year old trees growing on the prism; culverts removed. Travel planning would identify if motorized travel is appropriate on this road.
4-p	73072, storage-no treatment, moderate risks to soil-water, T&E, should be treated and decommissioned	73072 would be stored, with no treatment. Field data (PF-Roads-1) note that the road is decompacted and vegetation recovery ongoing.
4-q	73076, storage-no treatment, road should be treated to prevent potential violations.	WAT-8, ROAD-1, Road 73076 was identified for storage-no treatment due to roaded recreation opportunities. Field notes say ripped in 1996, vegetation growing in, regard as stored, no discussion of ATV use is documented on this road.
4-r	73094, Storage-no treatment, should be decommissioned,	73094 This road has 2 sections, the first part (MP 0.00 to 0.86) is a system road, no action would be taken on this portion, and this was mapped incorrectly in the EA and will be changed for the decision. Beyond MP 0.86 the undetermined portion will be converted to a stored road.
4-s	73264, storage-treat	Road 73264 Review of Meadow Mink Spring Watershed Restoration Project found that this road was stored with that decision. This road is

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		located on a ridge, is naturally recovering and has no connection to water. Road 73264 will be dropped from this Project.
4-t	73624, Bugle, storage-treatment	No further treatment will be scheduled for this road due to allotment access needs. It will be dropped from this project.
4-u	Decommissioning treatments should include the following: road length not accessible, hydrology disconnected, benefit to wildlife, not infested with noxious weeds, and ensures soil productivity with restoration of organic horizon. We urge these recommendations to be included.	These practices are commonly applied to decommissioned roads and are the optimum treatments. In some cases in the Martin Creek project, treatments may be less due road location on the landscape, the risk to soil, water, wildlife and fisheries resource. Stored roads typically receive a lower level of treatment because they would remain on the system and be available for future use. See the EA, Section 2.9.
4-v	If the BNF wishes to comply with the WO Memo, or add undetermined roads to the transportation system, then it must complete travel analysis.	Travel analysis is in progress with the travel planning process and not with this analysis. See the response to Comments 4-a, 4-g, 4-h.
5-a	We are opposed to blocking recontouring, ripping or decompacting these roads. What is really gained by this except to block our snowmobiles as well as some ATV's and make it look natural.	76% of the roads in this project would not be treated due to vegetation condition or past treatments, the decision would allow for coding in the roads database to match the future need, or lack of it. Roads that are proposed for treatment and showed evidence of travel in 2009, when the inventory was completed, would be left with an accessible access route With this project, the number of redundant roads would be reduced, infiltration improved, vegetative cover improved, and the risk of erosion and sedimentation in streams reduced. Please refer to Chapter 4 of the EA for more details on the benefits of blocking, recontouring and decompacting roads.
5-b	A full EIS should be done before taking on a job of this magnitude.	An EIS is required whenever it is determined the proposed actions or alternatives are likely to have a significant impact on the environment. The analysis conducted and used to prepare the environmental assessment for the Martin Creek Watershed Restoration Project did not find any of the effects of the project to be significant (as defined in 40 CFR 1508.27).

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		Therefore, the analysis can support a Finding of No Significant Impact and the preparation of an EIS is not necessary. Most of the accomplishments related to this project involve clarification of our historic "legacy" roads now classified as "undetermined" and their road status in the Database. Review of past decision documents (see also the response to Comment 4-g) found reference to changes in the road system but the Database was not updated to reflect these changes (Watershed Restoration in the Meadow, Mink, Springer Drainages and Watershed Restoration in the Martin and Bertie Lord Drainages). The roads analysis completed during planning for this Project (PF-ROADS-1 and 4) identified which undetermined roads were needed for future management and access and which were no longer needed due to duplication of access by other roads or changes in logging systems. The EA then evaluated effects of storage or decommissioning of those roads. Map 5, in the Decision Notice shows the road system that would result from Alternative 2. The majority of roads in this Project would need no additional treatment to meet the purpose and need, approximately 33 miles would need some level of treatment, the remaining 89 miles are naturally recovering or have already been treated (EA, Section 2.9).
5-c	The cost alone is another huge factor.	Please see response to Comment 3-d. Eighty-nine miles of road in this project need no treatment to meet the purpose and need. They have already been treated or are recovering without intervention (EA, Section 2.4 and 2.9)). For these roads, implementation of Alternative 2 would correct the coding in the road system database to correctly reflect the long-term use of the road. (EA, Section 1.3). Thirteen miles of roads proposed for storage would need treatment and 20 miles of road proposed for decommissioning would need treatment. The decommission treatment would typically be more intensive than storage but would depend upon resources at risk (EA,

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		p 9-10). Description of the treatments can be found in Section 2.9 of the EA. We estimate that it will cost approximately $1900/mile to store roads; so approximately $25,000 in cost, and $2,200 to $4500/mile to decommission, approximately $70,000, depending upon the number of crossings that need to be recontoured (EA, Section 2.9). The roads proposed for treatment, either stored or decommissioned, would need some sort of treatment (maintenance) to meet the intent of the TMDL (part of the Purpose and Need, EA Section 1.3) and reduce their effect on water quality and fisheries habitat. While this type of activity would move the forest toward the improvements recommended in the TMDL it would do nothing to improve soil conditions, wildlife habitat, or identify the long-term need for each undetermined road (EA, Sections 4.2.3, 4.3.1, 4.3.2, 4.3.6).
6-a	The EA points out that only "unclassified or undetermined" roads are included..and are not assigned a travel status in the database. In our scoping comments, we pointed out that several roads scheduled for action are in fact system roads with assigned travel status and are displayed on the 2005 Forest map. We assume that the Agency does not agree that these are system roads, since roads 722, 73094, 1394 remain listed for action in this EA. We do know that these roads have been available for motorized travel for decades and qualify as authorized for motorized travel under the Tri State Rule. Since these roads appear as legal motorized routes, they are system roads and should be removed from this project. We respectfully insist that these roads be removed from the project.	The roads you listed are roads that have several segments associated with them, one part that is a system road and the remainder that is classified as undetermined. Please see the response to Comment 3-a for discussion roads 722, 73094, and 1394.
6-b	..NEPA regulations prohibit the Agency from taking	Please see the response to Comment 3-a.

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	actions or committing resources to a project which would prejudice the outcome of the Travel Planning process..this EA denies they are making travel management decisions and claims "Alternative 2 does not address motorized access, meaning that it does not identify where motorized travel is appropriate." On the other hand treatment would include decompaction and blocking of the road surface and clearly announces the Agency's intent to limit access. We find the treatment of this issue to be contradictory. We submit that these actions constitute travel management and would be in conflict with the ongoing Travel Management process.	
6-c	Our preferred remedy would be for the Agency to remove roads 722, 73008, 73016, 73094, 5790, 73264, 1394, 73264, 73623.	Please refer to response to Comment 3-a, that discuss these roads and their system segments. Road 73016 was not discussed in previous comments. This road would be stored without treatment in this project. Please refer also to the EA Section 4.2.3, Appendix A, PF-ROAD-1 and Road-4.
6-d	Additionally, the Agency must be clear in their description of which roads will be blocked as part of this action.	Only those roads identified in Appendix A as "Treatment" would have any action on the ground associated with this project. No active treatments would occur on roads that have been proposed as "No Treatment". These have already been treated or are naturally recovering (EA, Sections 1.4, 2.4) Appendix A). Approximately 46 of the 59 miles to be stored are well vegetated and not erosive; these would receive no active (additional) treatments and would be left in their present condition and stored. 43 miles of the 63 miles to be decommissioned need no treatment, these would be left in their present condition and converted to decommissioned in the Database (EA, p Section 1.4, 2.4, 2.9, and Appendix A). On those roads

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		listed as "No Treatment Needed" no ground would be disturbed, they would be left in the present condition as they are recovering and not a risk to other resources. Their code in the Database would be changed to reflect the long-term use for this road as determined by Alternative 2. Refer also to the response to Comment 3-a.
6-e	No monitoring activities are proposed which measure the success of this project toward the stated Purpose and Need of the project, specifically to improve TMDL's and bull trout habitat in Martin Creek and it's tributaries. Will the execution and completion of this proposed action in fact produce the intended improvements in these parameters?	Yes monitoring will be a definitive part of this project, see EA Section 2.9.1. The Purpose and Need for this project includes three objectives: 1) Identify the road system needed to manage this land. Those roads needed to manage the land would be identified/coded correctly in the Database to identify their long-term use after a decision is made. When completed this will be reported in the Forest Plan Monitoring Report. 2) The goal is to protect and improve water, soil, fish and meet the intent of the Bitterroot Headwaters TMDL (reduce sediment contributing distances to less than 200' at sediment contributing points). There is a potential for sediment reduction with the Martin Creek EA.(TMDL, p 237, 240). See also the response to Comment 6-f below. 3) Comply with BNF Forest Plan to actively reduce sediment sources. Monitoring would continue for 3 years after implementation (EA, p Section 2.9.1). This is sufficient time to determine if additional seeding or stabilization work would be needed. Monitoring often occurs beyond that specified in the EA. Refer to Forest Plan Monitoring Reports 2006-2009, Item 19 for variety and duration of recent watershed monitoring, PF-WAT-16, and recent monitoring of similar projects that are attached at the end of this document.
6-f	We strenuously urge the Agency to include a monitoring program in this EA which will measure the influence of the project on TMDL's and bull trout viability. The monitoring requirements for this project should include baseline data and utilize standard protocols for making measurements of	Monitoring would occur following implementation of this project (EA, Section 2.9.1, refer also to response to Comment 6-e). Measurement of vegetation recovery and determination of length of contributing distance can be completed at crossing sites by measurement and observation of vegetation recovery and the presence of sediment plumes or transport pathways. Photo points will be established at a subset of implementation

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	relevant parameters.	sites to track vegetation recovery over time. Standard protocols would be used. USFS and FWP fisheries biologists periodically monitor the fish populations in the Martin Creek drainage at two long-term monitoring reaches: (1) a lower reach near the mouth of Martin Creek at stream milepost 1.3; and (2) an upper reach in the headwaters of Martin Creek at stream milepost 7.5. The method of monitoring is mark-recapture electrofishing which is used to calculate fish population estimates and track changes in those populations over time. The lower reach at stream milepost 1.3 has been monitored in 1991, 1992, 1993, 1994, 1997, 1999, 2001,2002,2003, and 2010. The upper reach at stream milepost 7.5 has been monitored in 1985, 1992, 1993, 1994, 1995, 2001, and 2003. Those two reaches will be periodically monitored in the future to detect any potential changes resulting from this project. Also, USFS and FWP biologists have been monitoring water temperatures in Martin Creek at stream milepost 1.3 every summer since 1993. That monitoring will continue every summer. We must emphasize that the time scale needed to detect improvements in fish populations or water temperatures resulting from a project such as this will be long-term (i.e. it will likely take decades instead of years). See also the response to Comment 6-e.
6-g	We submit that these extreme treatments cause harm to watershed in disproportion to their questionable benefits. We also submit that the impacts to watersheds resulting from these road treatments have been understated in this EA and benefits unjustifiably exaggerated. -recontouring will produce sediment in an amount similar or greater to that of new construction.	Please see response to Comment 2-b, photos of work recently completed on the BNF on pages 17 and 18 of the EA and the copies of 2011 monitoring reports attached to this document for results of similar recent projects. In the 2008 Forest Plan monitoring report page 85-88 are results of fisheries monitoring following road decommissioning, pages 97-98 display results of watershed monitoring of watershed restoration projects. Recent monitoring by hydrology and fish of roads stored in 2010 in the Elk Creek drainage found vegetation was recovering and stream conditions were

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	-recontouring invites weed infestations. -ripping damages existing vegetation, brings unproductive soils to the surface, and produces channels for erosion. -we presume that roadways preferentially collect seed and retain water which promotes regeneration. We submit this information is relevant to this EA and should be consideration as DM is developed.	improved over that of previous year (see attached) and fish were present where culverts previously blocked migration (also available as PF-WAT-17). Review of the2009 Forest Plan Monitoring Report (completed, not yet published/released; found discussion of results of monitoring decommissioned roads on pages 77, 93 and 94. PF-WAT-16 is a display of monitoring findings of recovery on roads decommissioned and stored in 2009, 2010 and a portion of this report is attached at the end of this document. In summary, monitoring has shown vegetation is more dense on decommissioned roads than stored roads. Sites that had knapweed on the road prism and surrounding landscape were found to have knapweed on the newly decompacted surface, however these same roads were found in later years to have forbs and native shrubs growing and competing well with knapweed. See also the response to Comment 3-e. Roads are built to be compacted and repel water-or they would become very soft and impossible to travel during wet periods, water from roads runs off the road surface rather than infiltrating. Compaction and limitation of soil moisture and precipitation infiltration on the road travelway the purpose of road construction and is intended to reduce vegetation growth on the road and allow for unrestricted travel in most types of weather. The intent of decompaction is to allow the road travelway to infiltrate water and allow for better growth of vegetation and deeper root systems. Refer also to the EA pages 35-59 for discussion on environmental effects for Alternative 1 (No Action) or Alternative 2. Public Comment and responses to them are reviewed by the decision maker and will be used to formulate the final decision in this project.
6-h	We recommend that the EA be revised to sharply focus on minimizing ground disturbances.	We believe this project has limited the amount of ground disturbance and still meet the purpose and need. Of 121 miles of road in Alternative 2, 33 miles of road are proposed for ground disturbing treatment (13 miles that would be stored, 20 miles that would be decommissioned). The remainder

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		of the roads in Alternative 2, would receive no treatment (EA, Section 1.4, 2.9) because they have already been treated or are recovering without treatment. Mitigation in Section 2.9.1 of the EA notes that if road surfaces are not eroding and have grown in with substantial grasses, trees, or brush, they would not be decompacted. See also the response to Comment 2-b that describes the treatments that are proposed and Section 2.9, Description of Alternative 2 and Section 2.9.1 Mitigation and Project Design for features that describe proposed treatments with Alternative 2.
6-i	We are concerned the EA misrepresented our scoping comments ("this practice (refers earlier to decompacting the roadbed) makes the roadway unusable for non-motorized recreational activities" excerpt from 4/30/2010 RCORU response to scoping letter): "The goal of reducing compaction and recontouring roads is to provide a stable landscape that mimics what is found in the immediate area. Doing so may make walking along the road prism more difficult; however it will not make travel any more difficult than it is on other nearby areas of the forest." (From EA). Proposed activities deny access to motorized and non-motorized visitors and should be avoided.	We appreciate your concern and took a hard look at leaving roads and segments in storage for future potential use for recreation and other land management activities. I feel we have found a good balance of retention for either placing historic roads back into the Bitterroot NF system of roads or decommissioning roads that are stacked and redundant that were typically created by old logging systems that resulted in "spaghetti plate" road networks that can be cumulatively harmful to watersheds. This project would not identify where motorized travel is appropriate; that would be accomplished with travel planning.
6-j	We submit that blocking, decompacting, or recontouring stored or decommissioned roads for the purpose of "inhibiting access" or "improving visual integrity" are not consistent with the P/N. Decisions based on these criteria should be reconsidered and eliminated from this project.	It is not the intent, nor stated as part of the purpose and need, to "Inhibit access" or "improve visual integrity". The project looks at historic road beds to determine which ones should stay on the system and which ones should come off, with 76% of the road receiving no treatment. Many of the roads being considered under the Martin Creek EA already had some level of treatment and/or are recovering naturally (EA, Section 2.9). Page 1 and 2 of the EA state the Purpose and Need of the project is to 1) identify the

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		road system needed to serve the land area; 2) apply appropriate treatment to reduce sediment sources and improve soil conditions and 3) comply with the BNF Forest Plan to reduce sediment sources from roads and minimize adverse effects to water quality and fish.
6-j(2)	We recommend that all road treatments preserve at least a single tread for use by stock or foot travel.	Access would be available on nearby untreated system roads as well as those 89 miles of project roads receive no actual treatment. On longer, recontoured roads, foot access would be maintained, refer to the Decision Notice. Where the inventory showed evidence of motorized travel an OHV accessible route would be maintained. Refer also to the response to Comment 3-a.
6-k	We request that roads designated for treatment be carefully reviewed for their motorized and/or non-motorized recreational opportunities and that the methods of treatment be reviewed to ensure continued access for the appropriate recreational activities.	Those roads scheduled to be treated were all analyzed in order to rate their importance to roaded recreation (PF-ROADS-1), the reviewing team included the OHV ranger and recreation staff. Many roads were placed in the storage category because of their recreation potential. The intent of this EA is not to identify where travel is appropriate but to identify which of those roads listed as ”undetermined”, in the road system database, should be retained for future use by full-sized vehicles and should be included on the transportation system and which should be decommissioned (EA, Section 1.3). Map 5, included in the Decision Notice, displays the road system that would be in place following implementation of Alternative 2.
6-l	Public should be informed of costs/options/benefits. For example, if this project were to be refocused to minimize ground disturbance (no recontouring or decompaction), what would the cost be?	Section 2.96 of the EA displays estimated costs for the project. Benefits are described in Chapter 4, and the Risk Benefit Table, PF-ROADS-1 displays risks and benefits for each undetermined road evaluated in this project. An alternative that does not include recontouring and decompaction as treatment options would not meet the purpose and need for this project. On the 33 miles of road scheduled for treatment soil productivity will be enhanced (EA, Section 1.3 and 4.3.6),resulting in improved infiltration processes and reduced erosion risk. (EA, Section

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		4.2.1). Many of these undetermined roads were constructed for logging systems that are no longer used with today's technology. As long as a road is on the landscape there is need for road maintenance; opportunity for erosion and sedimentation, and loss of soil productivity all of which contribute to reduced water quality, fish, and wildlife habitat, the spread of noxious weeds; and these costs are difficult to quantify. With declines in the federal budget, maintenance occurs on the roads most used and infrequently used roads deteriorate and have increasingly greater effects to watersheds and fisheries (DEQ, 2005,EA Section 4.2.1, 4.2.2) The Martin Creek EA is an important follow through to forest management activities. The EA looks at which historical roads are needed for future National Forest System Multiple Use activities and which ones can be removed in order to promote natural resources and watershed health.
6-m	With few exceptions, we support the recommendations of this project for roads to be decommissioned or stored, provided treatments applied do not preclude travel by motorized or non-motorized visitors.	Thank you, no decisions on travel by motorized vehicles will be made with this decision. Please see the response to Comments 3a, 3f, 5a,and 6-j(2).
6-n	This EA is making travel management decisions and is in conflict with the Travel Management process. Tri State 2001 OHV EIS	Please see response to comment 3a, 3-f.
6-o	We suggest that the recreational value of roads for public motorized or non-motorized use has not been fully evaluated. We request that those roads suggested for evaluation in Appendix I of our scoping comments be reconsidered. We would be pleased to participate in this evaluation.	Thank you for your offer. No decisions on travel by motorized vehicles will be made with this decision. As a result on your comments submitted on April 30, 2010, and input from our OHV ranger, several roads were ranked with moderate need for recreation in the risk benefit table (PF-ROADS-1) and were identified for storage. Stored roads are available for future forest activities and neither storage or decommissioning preclude them from use as an OHV trail in the future. See also the response to

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		Comment 6-j(2).
6-p	We believe the deficiencies pointed out (in this letter) are sufficiently significant to require the publication of a revised Environmental Assessment for this project, and we urge the Agency to do so. As it is currently proposed, we believe that the proposed action will have significant impacts to watershed, fisheries, and recreation and will require an EIS.	As a result of comments, additional information was added to the EA and the project file to clarify issues. Please refer to the electronic copy of the EA, available at http://www.fs.usda.gov/projects/bitterroot/landmanagement/projects for updates. Effects are discussed in Chapter 4 of the EA and summarized in the Decision Notice and support the finding of no significant impact.
7-a	Many of the roads that you intend to ruin are listed in Ravalli County Off Road User Association (RCORUA) comments and Maps (pre DEIS) and ours on the Travel Plan. Some are connector routes that should be left open to ATV's and some should be left open to full sized vehicles. **So they are part of the "Travel Plan" and do affect motorized use, do the "teams" not communicate with each other?** Also, several of RCORUA members along with Monte Monroe (the BNF OHV Ranger) and Jake Pintok rode and mapped some of these routes in the last several years, for possible use in the Travel Plan! For example Road 73624 was proposed as a connector route to road 73609, Road 73616 connects to road 73615 and is an existing jeep trail, road 73016 is a on the ground connector to roads 13314 & 5786, Road 73094 is an on the ground connector (used by motorized and non-motorized extensively) to trail 330 & 331 (somehow trails were erased from current maps, but on older	Roads 73616, 73615, 73609, 13314, and 5786 are not included in Alternative 2, they were removed prior to the release of the EA due to their location outside of the East Fork Bitterroot River drainage (EA, Section 1.1 and Appendix A, Maps located in Sections 2.9 and 3.4), 8177 was removed from Alternative 2 due to conflict with Travel Planning before the release of the EA. Please refer also to the response to Comment 3-a for information on other roads you are concerned with. See also the response to Comment 6-o.

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	maps as FS trails), road 8177 & spurs off of it (EA maps seems different to other maps) could be a possible connector to trail 330 & 331 (also used extensively during bow & rifle season) & several of the roads are good loop roads for OHV's including Side by Sides	
7-b	I do not see anything in the EA on any studies done on what "decommissioning" does to said wildlife.	Please see the EA, Section 4.3.2 for discussion on effects to wildlife. PF-ROADS-1 identifies the risk of individual roads to wildlife. The primary goal of this road decommissioning is the restoration of ecosystem processes in the Martin Creek watershed. Monitoring reports, from road decommissioning done under the Burned Area Recovery EIS, document continued wildlife use of these areas after implementation. While decommissioning roads may create a temporary disturbance during implementation, it does not preclude wildlife species from using the area as they had previously. After the treatment of decommissioning settles animals will be able to travel over the decommissioned road in the same fashion that they travel over the rest of the Forest. Ungulates will forage on the new grass that is planted on the old roadbed and small mammals will utilize the slash and vegetation for shelter. Western toads (*Bufo boreas*), a Region 1 FS Sensitive species, have been documented breeding on decommissioned roads in western Montana where slash created structural diversity and microhabitats (Bradley 1997). Roads on USFS lands can be especially harmful to wildlife communities because of their location in relatively ecologically intact systems (Switalski et al. 2007). The negative effects roads have on wildlife have been well-documented by numerous studies (Lugo & Gucinski 2000, including a special issue of *Conservation Biology* (February 2002), Forman et al. 2003). Forest Service roads allowing access deep into forestlands increase

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		poaching, over-hunting and over-trapping; amplify negative edge effects; cause fragmentation and hinder wildlife movement (Wisdom et al 2000, Trombulak and Frissell 2000). As a result of these effects, several studies have recommended road decommissioning to improve habitat security for grizzly bears (*Ursus arctos horribilis*; Frederick 1991, USFWA 1993, Powell et al. 1996, and Mace et al. 1999), black bears (*Ursus americanus*; Boone and Hunter 1996), and rare forest carnivores (Bull et al 2001). Research shows road decommissioning also benefits cavity nesting birds by reducing access for wood cutting (Bull and Wales 2001). While it is true that decommissioned roads may create conditions conducive to weed invasion, research suggests that ripping roads may actually reduce the risk of invasions because the native vegetation that is planted during decommissioning is able to out-compete weeds and because ripping eliminates a primary vector (human access) for further invasion (Switalski et al 2007). The Bitterroot National Forest recognizes there will be localized effects to wildlife in the area; however, our analysis leads us to conclude, the benefits of this project will negate these minor disturbances.
7-c	Many of these roads were built following original trails, perhaps even Indian trails, thus you are also destroying history and maybe even ruining some "heritage" sites even more than you already have.	Please refer to the EA, Section 3.5.4 and 4.3.5, and Project File Document SPEC-1 for discussion on risks to heritage sites. In summary, No significant cultural resources were discovered within the area of potential effect for this project because it is within the existing road where disturbance has already occurred. Areas of previous disturbance such as road prisms and slopes exceeding 40% are defined as low probability terrain for cultural sites.
7-d	When you "decommission" a road with a ripper or other heavy machinery you not only cut motorized usage but eliminate all usage, hiking, horseback	Please refer to Project File document WAT-16 that displays the results of monitoring conducted on roads in the North Rye watershed that were stored and decommissioned in 2009 and 2010. These are the same treatments that would be applied on those roads identified for treatment in

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	riding, wildlife corridors or habitat for decades. (Are there any "studies" done on this damage?)	this project. Access is changed but there are other travel routes available in the same vicinity provided by the roads that would not be treated. Please see the map in the Decision document that displays all roads in the project area that would remain after implementation of Alternative 2. Storing and decommissioning roads can enhance forest lands by promoting infiltration of precipitation, encourage root systems of vegetation to expand, and provides room for other vegetation to colonize the area among many other benefits (EA, Section 2.9, 4.2.1, 4.2.2, 4.3.2). See also the response to Comments 2-b, 3-e, 5-a, 6-g, 6-j, 6-0 and the monitoring reports attached to this document below.
7-e	You are wasting our money needlessly, again, by studying, analyzing and destroying (oops "decommissioning") these roads, and the budget seems understated in the EA.	I appreciate your concerns over cost. I also have concerns over costs in managing the Sula Ranger District and tax payer funds that go into projects and the overall management of these lands. It is important for us as a land managing agency to look at management activities of the past, as in the historic roads found in the Martin Creek EA, and determine their purpose and need on the modern landscape. Many of these historic roads are redundant and many are old logging spurs, fully grown over, that no longer serve a management purpose. Travel planning will determine the types of travel on BNF roads and trails; not the Martin Creek EA. This EA analyzes which of these legacy roads/segments are needed for future management activities and which can be decommissioned to lessen their overall impact on the watershed surrounding Martin Creek and which roads/segments may or may not need treatment. Treatments on roads/segments that were traveled in 2009 will be deferred until a travel planning decision is made. The East Fork of the Bitterroot River is critical Bull Trout Habitat and we are obliged to protect this endangered fishery and the tributaries that feed into this main stem from undue sedimentation. This EA takes a hard look, a responsible look, at this cause and effect relationship. In our best judgment, based on the best available science in the EA analysis, It is my

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		professional judgment that we have found the best course of action. Please refer to Project File document WAT-16, this helps to display the benefits of road storage and decommissioning. See also the monitoring reports located at the end of this document. Response to Comments 3-d and 6-l and the EA in Section 2.9 for information on costs. The cost estimates are based upon work completed on the BNF in 2009 and 2010 on the Bitterroot National Forest(EA, p 18).
8-a	I assert that the analysis presented in the EA is seriously flawed and does not accurately comprehend the environmental and social impacts of the Proposed Action.	I believe the analysis takes a hard look at the environmental and social impacts please see Chapter 4.
8-b	The EAs does not limit itself to consideration of "undetermined" roads but includes several system roads;	Several of the roads do have a portion of them that are on the roads database, and the portion of the road that is not a system road is included in this project. FSDR 722, 73094, 1394 8177 are in the group that has a section of system road and undetermined road. In the Martin Creek watershed roads 722 MP 0.00 to 0.80, 1394 MP 0.00 to 1.50, 73094 MP 0.00 to 0.86, 8177 MP 0.00 to 3.373 are National Forest System Roads open to motorized travel totaling 6.533 miles. These sections of road appear on the 2005 Bitterroot National Forest Travel Map. This analysis will not change travel designations on these or any other sections of road within the Martin Creek watershed. It is not the intent of this document to do travel analysis in the Martin Creek watershed. The object of this analysis is to determine the future need of undetermined roads in the project area. This EA will not affect current travel designation on any road within this analysis area. Of those roads mentioned, 722, 1394, 73094, and 8177, each have sections that have been identified as historic or "undetermined", and are included in the Martin Creek Analysis. They are as follows: Road 722, MP 0.80 to 4.60, road 1394 MP 1.50 to 2.80, road 73094 MP 0.86 to 1.60, and road 8177 MP 3.37 to 6.20

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8-c	The EA proposes action on several roads being discussed as part of the travel management process;	Please refer to Comment 3-a, 8-b, and 6-o.
8-d	The EA is not specific on which roads would be "blocked": Will roads proposed for storage or decommissioning **without treatments** be "blocked" by recontouring entrances or other means?	Please refer to Table A-1 in the Decision Notice. Only those roads that have "Treatment" in the Proposed Treatment column would be treated. 76% of roads would receive no treatment.
8-e	The EA has not adequately evaluated the potential for these roads for motorized and non-motorized recreational access:	This project is not doing Travel Planning, please refer to Comment 6-o.
8-f	The EA has inadequately evaluated the short and long term environmental and recreational impacts of extreme methods of road treatments such as recontouring, decompacting, and ripping roadways. It is highly likely that these extreme treatments cause irreparable harm to the watersheds, the viewscapes, and to the recreational uses of these roads. In many cases these extreme treatments invite weed infestations and interrupt the natural movements of wildlife	Many of the roads in the Project would receive no treatment. Of those roads analyzed on this project, eighty-nine would receive no treatment except to change coding in the Database from "undetermined" to Stored or Decommissioned. The treatments that are proposed on the remaining roads would improve watershed and other resource conditions (EA, Section 4.2.1, 4.2.2, 4.3.1, 4.3.2, 4.3.6, and see responses to comments 2-b, 6-e and 6-g). Please refer to Comments 2-b, 6-g, for discussion related to how project implementation would affect watershed and fisheries conditions, Project File document WAT-16 and the monitoring reports below for monitoring results. Comment 7-b discusses impacts to wildlife movement and Comment 3-e weed infestations. After reviewing public comment, additional information was added to the EA, see section 4.2.3 to further address motorized/non-motorized recreation concerns; see also the response to Comment 3-a and 6-o. Also, an OHV accessible route would remain on those recontoured roads that the inventory identified with motorized use in 2009 to eliminate any potential conflict with Travel Planning. This project would not make travel management decisions (EA Section 1.3, 1.4), it does not address travel on roads included in the travel management project (EA Section 1.4, 4.2.3).
8-g	The Monitoring Program is misdirected and	We often rely on research level programs to help provide information on

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	inadequate. This is a watershed restoration project, and monitoring should include short and long term monitoring of water quality and fish habitat data.	the benefits of management activities such as those proposed in this project. Research level monitoring is intensive, time consuming, costly and provides information that can be used as reference by forest personnel who do these kinds of projects to help determine effects and benefits to the resource and to assist in identification of proposed activities. Some of these references are listed in the response to Comment 2-b. We also have local monitoring efforts that are published annually in the Forest Plan Monitoring Report that include fisheries monitoring as described in Comment 6-f (evaluates fish populations and habitat), efforts similar to PF-WAT-16 (a monitoring report on revegetation success on decommissioned roads, and other monitoring of restoration projects that occur throughout the forest. Monitoring of vegetation establishment after land disturbing activities is very important. The intent of projects that improve infiltration or reduce erosion is to allow precipitation to soak into the ground rather that runoff causing erosion and sediment transport to streams. Any activities that reduce the amount of runoff and erosion of soil would reduce sediment contribution to streams. In the Water Quality Restoration Plan and Total Maximum Daily Loads for the Bitterroot Headwaters Planning Area, sediment was identified as one of the major pollutants in the East Fork Bitterroot River watershed and a restoration target was assigned that recommended a 42% reduction in sediment from forest roads (EA, Section 1.3, 4.2.1, 4.2.2). Please refer to the response to Comment 6-g, and the monitoring reports attached below. Monitoring such as the fisheries monitoring described in Comment 6-f would continue but not be tied to this project and vegetation recovery monitoring similar to what is reported in PF-WAT-16 would occur annually as a result of this project. The intent of the monitoring is simple; to answer the question “Is vegetation colonizing the site?”, and if not, “what additional efforts need to be taken”? Monitoring results are

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		published in the Forest Plan Monitoring Report under Items 17, 19, and 22. See also response to comment 6-f.
8-h	I recommend that it be revised and re-issued, with an emphasis on limiting the scope of the project to include only "unclassified" roads, avoiding making travel management decisions either directly or indirectly, and focusing on treatments which cause the absolute minimal amount of ground disturbance.	Alternative 2 includes only historic or legacy "undetermined" roads, is that what is meant by "unclassified"? Several roads in Appendix A have sections that are system roads and no treatment is proposed to the system road sections. Treatments would only occur on the undetermined roads (See responses to Comment 3-a, 3-f, 6-a, 7-a, 8-b. We have minimized the number and miles of road that would receive treatment with Alternative 2 (EA, Appendix A, Section 1.4, 2.9); eighty-nine miles of road in the project area do not need treatment and none is proposed. Please see the response to Comments 2-b, 3-a, 6-a, 6-c, 8-b. Sections 2.4 and 4.2.3 discuss this project and it's concurrence with Travel Planning. See the response to Comment 3-a for avoidance of travel planning conflict. The intent is to not conflict with the BNF- Travel Management EIS but to identify which undetermined roads are needed, reduce sediment contributions and contribute to meeting the goal identified in the Headwaters TMDL to reduce sediment from existing roads (EA, Section 1.3).
9-a	Why not include other places in the East Fork like Tolan Creek in this project?	We limited the scope of this project area to undetermined roads in Martin, Bertie Lord and Cameron Creek although some other undetermined roads were included due to initial mapping efforts. It is not possible to address undetermined road issues in the entire East Fork due to the size and complexity it would involve. This is the first step in evaluation which undetermined roads are needed.
9-b	Concerned about the appearance of disconnected roads in Map 2, Proposed Action.	The roads really are not disconnected. A portion of them are system roads and not included on this map. The map in the Decision Notice includes those connecting routes. Travel Management would address these system roads.
9-c	Serious Erosion on abandoned fireline in Martin	Forwarded this information to OHV ranger on 8/3/11.

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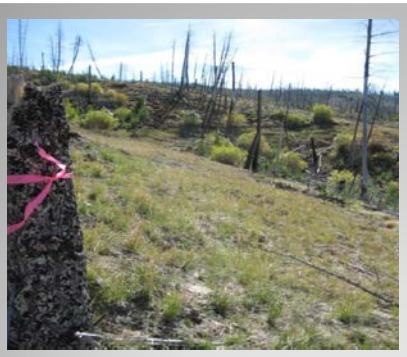
	Creek due to ATV use.	

Project File Document WAT-16 displays monitoring of the roads stored or decommissioned with the Burned Area Recovery Project. The decommissioned roads were recontoured in 2009, the stored roads in 2010. It is displayed here for convenience, please refer to the project file for more information.

FSDR 62832, Spring 2010 and September, 2011



FSDR 62835, North Rye Decommissioning
October 2010 and September, 2011

FSDR 62833, North Rye Road Storage w/ATV North Rye, October 2010, September 2011

FSDR 62831, North Rye Road Storage October 2010 and September, 2011

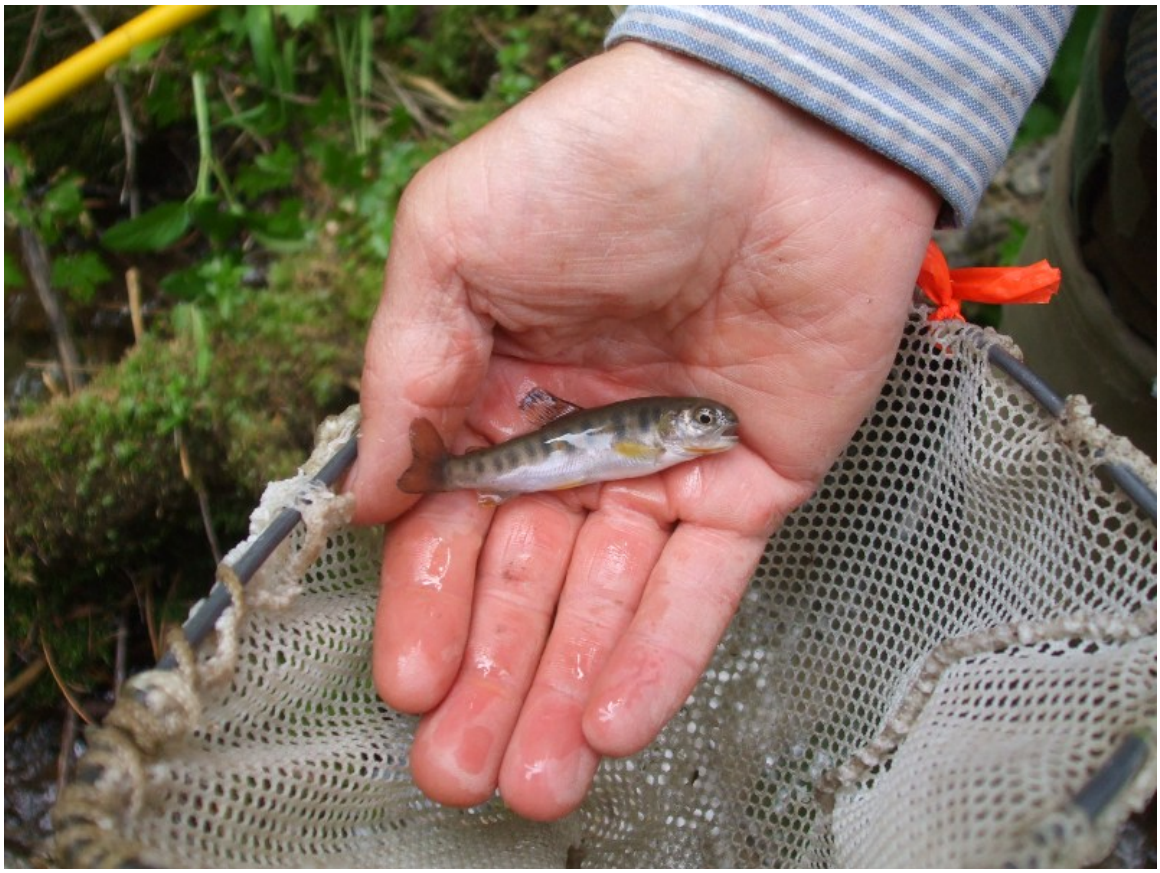
UNIT LOG	1. Incident Name Burned Area Recovery	2. Date Visited 7-20-2011 ***Prepared***: 9-13-2011	3. **Visited:** Unit #: Road #: 13833 Other Activity: road decommissioning and storage
4. Project Area Burned Area Recovery Road Decommissioning and Storage, FSR 13833	**5. (Name and Position)** Michael J. Jakober		

7. Parties Involved		
Name	**Position**	

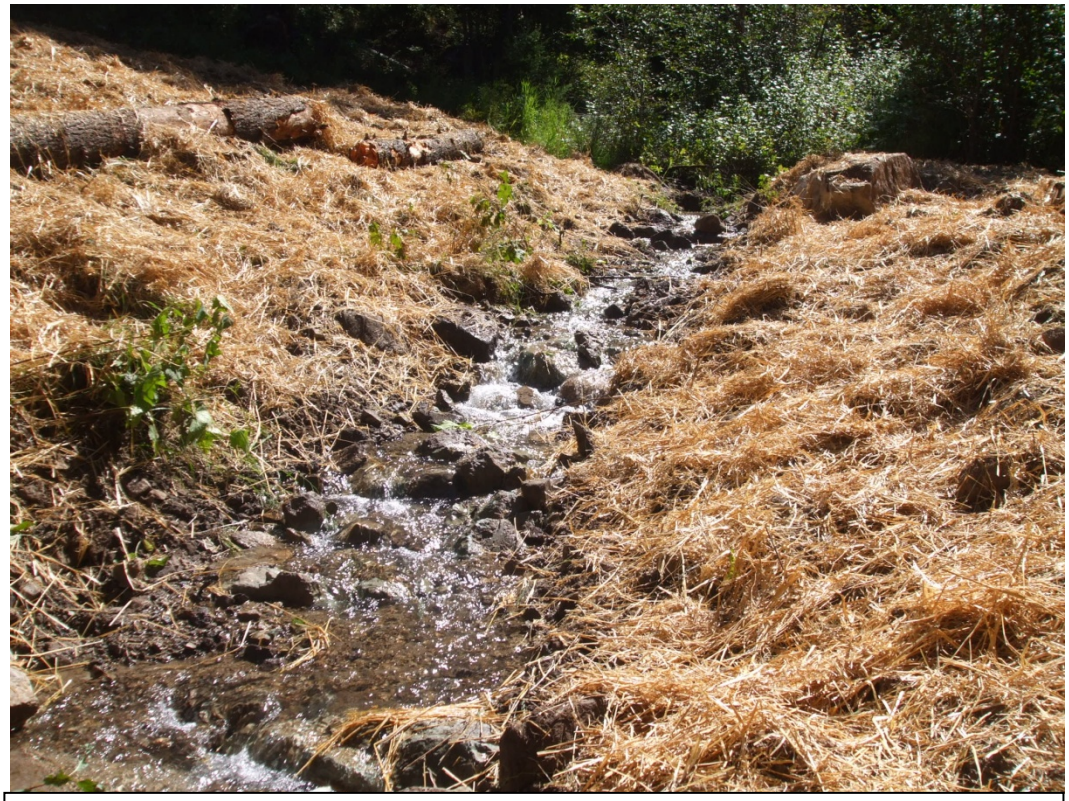
8. Activity Log	
Activity Reviewed	
Burned Area Recovery Road Decommissioning and Storage, FSR 13833	The purpose of this unit log is to document my monitoring of the storage of FSR 13833, particularly the two crossings of Elk Creek where culverts were removed. FSR 13833 was placed in storage in August and September, 2010 as part of implementation of the Burned Area Recovery project.
9 Findings and/or Recommendations	
	Prior to storage, FSR 13833 was a gated road (year-round closure to full-size vehicles) that starts out in the bottom of Slate Creek and switch-backs up the hill in the Elk Creek drainage. It contains two spurs – FSRs 13859 and 13860. FSR 13833 and its spurs cross Elk Creek a total of four times. In the Burned Area Recovery Record of Decision (ROD), FSR 13833 was erroneously listed as a seasonal closure and proposed for BMP upgrades. The actual travel status is closed year-round to full-size vehicles. As a result, an 18.1 analysis was completed in 2010 that changed the treatment from BMP upgrade to storage. Implementation of the storage occurred in the latter part of August, 2010 and into early September, 2010. The Forest watershed excavator and crew conducted the work. Because the fills on the two upper culvert crossings of Elk Creek were very deep and the culverts were adequately sized, the fills were partially removed but the culverts were left in place. The lower two culvert crossings of Elk Creek were fish barriers. The culverts and fills were removed, and the natural topography of the drainages was restored. On July 20, 2011, I monitored the storage of FSR 13833 and the two crossings of Elk Creek where culverts were removed. The south zone fish crew and I also conducted several electrofishing surveys upstream and downstream of the road crossings to look for fish. Here are my

	findings: Both of the culvert removal sites on Elk Creek looked good (see attached photos). Channel grades matched those of the natural channel. Channel downcutting and widening occurred at both sites during the prolonged high flows of spring and early summer, 2011 (see attached before and after photos). The grade control structures that were installed at the time of removal remained stable and functioned properly. Sediment deposition that was visible last fall following removal was largely gone and indiscernable. Grass growth on the recontoured banks was satisfactory considering for the first growing season. Most of the shrub seedlings that were planted in autumn, 2010 were alive and growing. The decompacted sections of FSR 13833 contained decent grass growth. I did not see signs of significant erosion. Juvenile age-class westslope cutthroat trout were present in Elk Creek above and below both of the culvert removal sites. This is significant because prior to removing the culverts, no fish were present upstream of the culverts. It was very encouraging to discover that in the past ten months or so since culvert removal had occurred, small westslope cutthroat trout (most fish 1-3 inches in length) had moved upstream past the previous culvert barriers and recolonized about half a mile of Elk Creek that had been unoccupied.
10. Prepared By: Michael J. Jakober, south zone fisheries biologist	

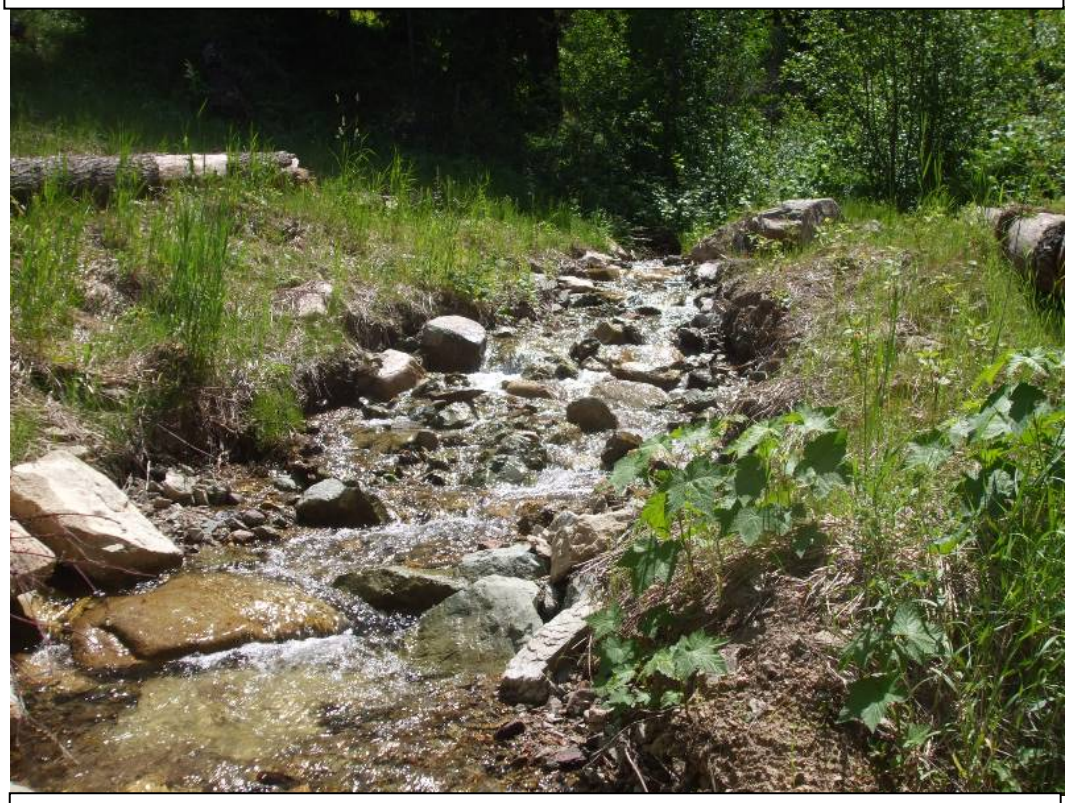
ICS 214



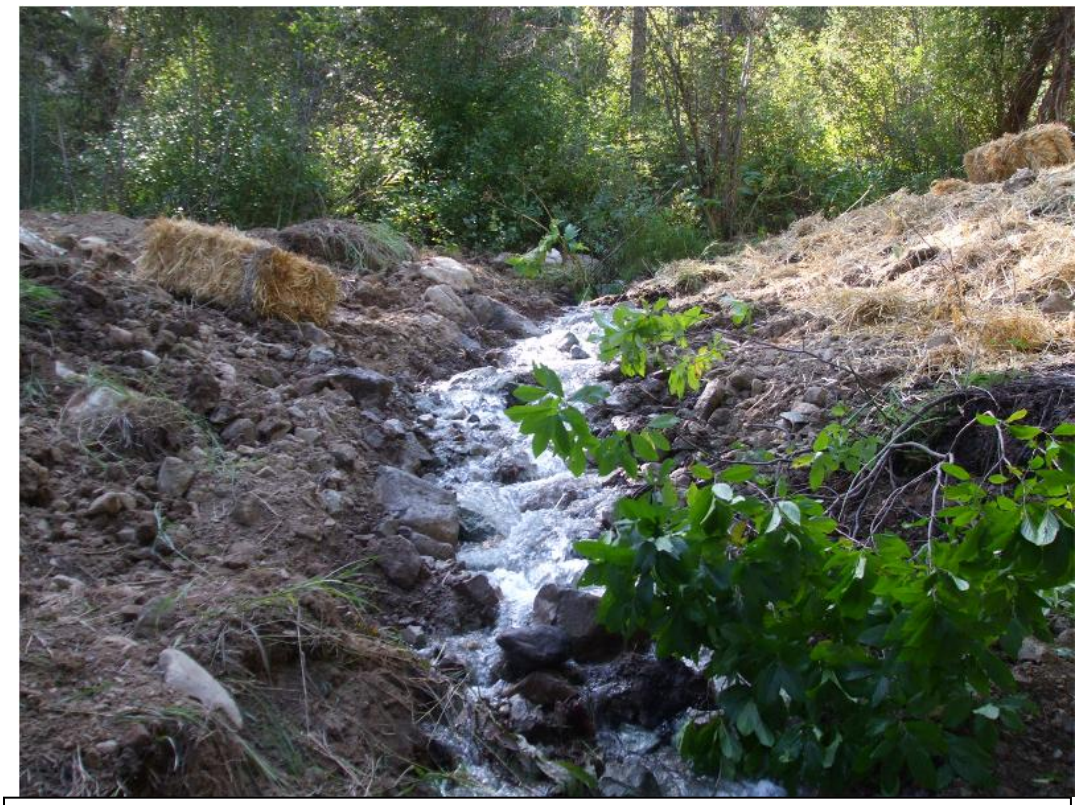
Juvenile westslope cutthroat trout such as this fish recolonized about half a mile of Elk Creek within the first 10 months following removal of the culvert barriers.



Upper FSR 13833 crossing of Elk Creek, immediately following culvert removal (Sept 2010)



Upper FSR 13833 crossing of Elk Creek, 10 months later (July 2011)



Lower FSR 13833 crossing of Elk Creek, immediately following culvert removal (Sept 2010)

Lower FSR 13833 crossing of Elk Creek, 10 months later (July 2011)

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