UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

March 6, 2013

Ms. Amber Kamps
Lincoln District Ranger
Helena National Forest
1569 Highway 200
Lincoln, Montana 59639

Re: CEQ #20130012; EPA Comments on Blackfoot Travel Plan Draft Environmental Impact Statement

Dear Ms. Kamps:

The U.S. Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Lincoln Ranger District, Helena National Forest, Blackfoot Travel Plan. The EPA reviews EISs in accordance with its responsibilities under Section 102(2) (C) of the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, 40 CFR Parts 1500-1508. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. The EPA's comments include a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

The EPA appreciates the efforts of the Lincoln Ranger District and Helena National Forest in preparing the Blackfoot Travel Plan/DEIS. We support Forest Service efforts to properly manage and control motorized activities so that they occur in a manner and location consistent with protection of the environment and ecosystems for use by future generations. We believe motorized uses in general are more likely to accelerate erosional processes, worsen poor road conditions, and increase stream sedimentation and degradation of fisheries habitat when compared to non-motorized uses. Roads often tend to become wider and rutted with heavy motorized use, creating a greater need for monitoring of road conditions, and for road maintenance for repair and erosion control. Sediment yields are generally higher from motorized routes than from non-motorized routes.

We fully support proposed development of motor vehicle use maps (MVUMs) for the Blackfoot Travel Planning Area, including prohibition of wheeled motor vehicles uses that are not consistent with MVUM designations which should improve public understanding of travel rules. This should in turn improve compliance with and enforcement of Travel Plan requirements, and reduce adverse environmental impacts associated with roads and motorized uses.

It is important, therefore, that the preferred alternative manage motorized routes and motor vehicle access adequately to protect water quality and fisheries habitat, soil integrity, wildlife habitat and

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security. Management of motorized routes should address forest connectivity and reduce habitat fragmentation by motorized routes, and reduce threats of weed invasion, while allowing adequate access for management and recreation. The challenge is in providing adequate access for land management and public recreation while protecting and restoring aquatic and terrestrial ecosystems. Where there are conflicts between access and recreational use and long-term protection of resources and ecosystems, we believe resource and ecosystem protection must be given priority to sustain and protect resources and ecosystems for use by future generations.

Of the two action alternatives evaluated in the DEIS, we support Alternative 3 which appears to better address the adverse environmental impacts associated with roads and motorized uses. Alternative 3 includes the lowest mileage of roads and trails open to motorized uses; lowest open road density (1 mi/mi^2), especially in sensitive wildlife habitats; most miles of road decommissioning (197 miles); greatest reduction of road sediment transport to streams (24.6 tons sediment reduction); greatest reduction in riparian roads (31 more miles of riparian road decommissioned with Alternative 3 in comparison to Alternative 2); most road culvert removals (104 more culvert removals); least motorized routes on sensitive soils and least motorized routes in roadless areas. We believe Alternative 3 will result in greater benefit to watershed conditions, and better addresses wildlife concerns associated with roads and motorized uses, relative to Alternative 2 and no action (Alternative 1).

We have the greatest environmental concern with the no action alternative (Alternative 1) that would leave many unauthorized roads causing resource damages on the landscape, and not include preparation of a MVUM for the travel planning area. While Alternative 2 includes preparation of a MVUM, it also includes more roads and motorized uses resulting in less protection for watersheds, water quality, fisheries and wildlife habitat and security, and more weed spread. The EPA considers Alternative 3 to be the environmentally preferred alternative. We encourage the Helena NF to select Alternative 3.

While we appreciate the Helena NF's proposed development of a MVUM for the planning area to designate routes open and closed to motorized travel, and to store, relocate, and/or decommission routes in sensitive locations that cause resource damages, we have concerns regarding adequacy of road maintenance and road BMP implementation. Roads are often the major anthropogenic sediment source adversely affecting hydrology, water quality, and fisheries of streams. The Travel Plan/DEIS does not make it clear whether the roads remaining on the landscape in the planning area are, or will be, adequately maintained. It is known that prolonged under-funding of road maintenance on National Forests has resulted in degraded road conditions, and there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis,* March 22, 2007). Adequate funding is needed to properly maintain roads remaining on the landscape. Improvements to forest road systems and conduct of proper road maintenance and road BMP and drainage improvements are critical to protecting aquatic health.

We believe road and trail networks should be limited to those that can be adequately maintained within agency budgets and capabilities. Roads which cannot be properly maintained should be decommissioned. We support prioritizing decommissioning of roads close to streams to maximize water quality improvement benefits. We recommend that the FEIS include additional discussion of road conditions, and adequacy of road maintenance and BMPs, and adequacy and availability of funding to implement needed road/trail BMPs. We suggest that such information be added to the road details in Appendix C.

The Blackfoot travel planning area includes waterbodies listed as water quality impaired by the Montana Department of Environmental Quality (MDEQ) under Section 303(d) of the Clean Water Act (e.g., Arrastra Creek, Blackfoot River, Sandbar Creek, Willow Creek, Poorman Creek, Ward Creek, Buffalo Gulch, Jefferson Creek, Nevada Creek, Washington Creek). Sediment (largely from forest roads) is identified as the principle cause of water quality impairment. It is important that the Travel Plan avoid further degradation of impaired waters. The Helena NF should coordinate travel planning with the MDEQ to assure travel plan consistency with total maximum daily loads (TMDLs) and water quality restoration plans being prepared by MDEQ for restoration of full support for beneficial uses in 303(d) listed streams within the planning area (i.e., contact MDEQ staff Mr. Robert Ray at 406-444-5319 and Mr. Dean Yashan at 406-444-5317). We also encourage review of the MDEQ's pamphlet, ***"Understanding the Montana TMDL Process,"*** which can be downloaded at http://deq.mt.gov/wqinfo/TMDL/default.mcpx .

We also note that Executive Orders 11644 and 11989, "Use of Off-Road Vehicles on Public Lands," require agencies to ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands; promote the safety of all users of those lands; and to minimize conflicts among users. We agree that MVUMs that clearly identify designated motorized routes, supplemented by signs on the ground, should promote improved public understanding of travel requirements and user compliance. However, we also believe policing and enforcement are needed to supplement MVUMs, promote travel plan compliance, and better ensure adequate protection of water quality, fisheries, wildlife, and other sensitive resources.

Finally, the draft Plan/DEIS did not include much discussion of monitoring and adaptive management in regard to monitoring and evaluating effects of Plan implementation, particularly identification of undesirable road/trail conditions, problems, or unexpected results that may occur, so they can be mitigated. We recommend that the FEIS provide additional disclosure in regard to monitoring and adaptive management and potential outcomes of travel management. For example, stating that roads or trails will be closed if monitoring shows that motor vehicle use is causing or will cause adverse effects on public safety or water quality, fish habitat, soil, vegetation, wildlife, wildlife habitat, or cultural or historic resources.

The EPA's more detailed questions, comments, and concerns regarding the analysis, documentation, or potential environmental impacts of the Blackfoot Travel Plan DEIS are included in the enclosure with this letter. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action have been rated as Category EC-2 (Environmental Concerns - Insufficient Information). The EPA's environmental concerns are associated with impacts to water quality, fisheries, wildlife and other resources resulting from roads and motorized uses that cause resource damages, particularly in regard to Alternative 1 (no action) that would leave many unauthorized roads causing resource damages on the landscape and not include preparation of a MVUM for the travel planning area, and Alternative 2 that includes more roads and motorized uses and higher road densities resulting in less protection for watersheds, water quality, fisheries and wildlife habitat and security, and more weed spread. We have fewer environmental concerns with Alternative 3, although some environmental concerns remain relative to adequacy of resources to properly maintain roads and to police and enforce Travel Plan requirements. A summary of EPA's DEIS rating criteria is attached.

If you have any questions you may contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at (406) 329-3313, or via e-mail at potts.stephen@epa.gov . We appreciate your willingness to consider our comments at this stage of the NEPA process.

Sincerely,

Julie A. DalSoglio
Acting Director
Montana Office

Enclosures

cc: Suzanne Bohan/Judy Roos, EPA, 8EPR-N, Denver
Robert Ray/Dean Yashan, MDEQ, Helena

EPA Comments on the Draft EIS for the Blackfoot Travel Plan

Brief Project Overview:

The Helena National Forest (NF) prepared the Blackfoot Travel Plan DEIS to evaluate proposed changes to the existing system of designated motorized public access routes and prohibitions within the Blackfoot travel planning area for wheeled motorized vehicles. The project area encompasses approximately 238,000 acres of National Forest System (NFS) lands on the Lincoln Ranger District, Helena NF in Montana, including Inventoried Roadless Areas (IRAs), but not wilderness.

The objective of the Travel Plan is to provide a manageable system of designated public motorized access routes and areas, consistent with and to achieve the purposes of Forest Service travel management regulations (36 CFR Part 212, subpart B). Designated wheeled motorized routes within the project area would be displayed on a motor vehicle use map (MVUM), and public use of wheeled motor vehicles other than in accordance with the MVUM designations would be prohibited. The analysis is focused on non-winter use; travel routes over snow are not included. Winter travel is being addressed in a separate analysis. Three alternatives were evaluated, no action and two action alternatives. Both action alternatives include proposals for non-motorized uses and methods to physically store, decommission, relocate, and construct certain roads and trails. A preferred alternative was not identified.

Alternative 1 is the no action alternative involving no changes to the existing system of available public motorized routes and areas within the travel planning area, and no development of an MVUM. Currently there are approximately:

- 446 miles of NFS roads in the Blackfoot travel planning area open to public motorized use
- 60 miles of motorized trails
- 71 miles of non-motorized trails
- 93 miles of roads acquired through land exchange (13 miles of which are currently open to motorized use)
- 62 miles of roads not previously part of the road or trail inventory (unauthorized routes) that is currently open to public motorized use
- 21 miles of roads considered to be naturally decommissioned per field investigations (roads that are vegetated to the point that they are not drivable and thus are reclaimed on their own or naturally decommissioned

Alternative 2, the proposed action, involves the following changes to designated travel routes:

- Approximately 98 miles of roads would be closed to public wheeled motorized use (348 miles of NFS roads would still be available)
- Approximately 30 additional miles of motorized trails would be designated (92 miles of motorized trails would be available)
- Approximately 51 additional miles of non-motorized trails would be designated (122 miles of non-motorized trails would be available)
- Approximately 2 miles of new motorized trail would be constructed
- Approximately 31 miles of new non-motorized trail would be constructed
- There would be no change to approximately 21 miles of roads currently considered naturally reclaimed/decommissioned per field investigations (roads that are vegetated to the point that they are not drivable and thus are reclaimed on their own , or naturally decommissioned)

- Approximately 62 miles acquired through land exchange would be identified for closure, storage or decommissioning.
- Approximately 39 miles not previously part of the road or trail inventory (unauthorized routes) would be identified for closure, storage or decommissioning
- Approximately 133 miles of roads would be stored
- Approximately 8 miles of roads would be decommissioned

Alternative 3 was prepared to respond to issues regarding wildlife habitat and security, fisheries and water quality, and the quality of the non-motorized trail system, and would include the following:

- Approximately 139 miles of roads would be closed to public wheeled motorized use (307 miles of NFS roads would still be available)
- Approximately 13 miles of motorized trails would be closed (47 miles of motorized trails would be available)
- Approximately 88 miles of additional non-motorized trails would be designated (159 miles would be available)
- Approximately 3 miles of new motorized trail would be constructed
- Approximately 0.5 miles of new road would be constructed
- Approximately 31 miles of new non-motorized trail would be constructed
- Approximately 21 miles of roads would be considered naturally decommissioned per field investigations (roads that are vegetated to the point that they are not drivable and thus are reclaimed on their own or naturally decommissioned).
- 67 miles acquired through land exchange would be identified for closure, storage or decommissioning.
- 54 miles not previously part of the road or trail inventory would be identified for closure, storage or decommissioning
- Approximately 75 miles of road would be stored
- Approximately 197 miles of road would be decommissioned

Comments:

1. The EPA appreciates the inclusion of clear descriptions of alternatives, including tables depicting route mileage under each type of use; Table 4 showing typical levels of road closure, storage and decommissioning; listing of project design features and mitigation measures; discussion of alternatives considered but eliminated; Table 6 comparing alternatives; road details by alternative in Appendix C; maps of alternatives in Appendix G; and road BMPs in Appendix H. The alternatives descriptions, tables, including summary comparison tables, maps, and other appended information help clarify alternatives, define issues, and provide a basis of choice among alternatives for the decisionmaker and the public as directed by the CEQ's regulations for implementing NEPA (40 CFR 1502.14).

Alternatives

2. Forest Travel Plans are critical elements in the management of National Forests, providing direction to manage road and trail networks for public recreation and conduct of land management activities. Public recreational demand and access has increased significantly in recent years, and motorized uses and roads in many cases have caused increased damage to

aquatic and terrestrial resources. We have been concerned about environmental effects of roads, trails and motorized uses, particularly increasing use of off-highway vehicles (OHVs) and all-terrain vehicles (ATVs) that occur away from roads and trails, including steep slopes, fragile soils, wet meadows, and around water bodies.

Newer motorized vehicles such as trail bikes, ATVs, 4x4's, and snowmobiles can access areas much further into the Forest than they could historically, forcing wildlife onto smaller and smaller patches of habitat, fragmenting habitat and migration corridors, affecting wildlife behavior and life history functions and adversely affecting wildlife security and increasing wildlife mortality; and causing soil erosion and adverse effects to water quality, aquatic habitat and fisheries; increased dust emissions to air; and spreading weeds. Demand for recreation opportunities on public land may be exceeding the capability of the land and resources to provide recreation in a manner that is consistent with resource and ecosystem protection. The Helena NF faces a great challenge in providing adequate access for land management and public recreation while protecting and restoring aquatic and terrestrial ecosystems.

We fully support the Helena NF's proposed preparation of MVUMs and prohibition of wheeled motor vehicles uses that are not consistent with MVUM designations. It is important to restrict motorized vehicles to designated routes and prevent of cross-country travel that causes resource damages. Adequate limitations and restrictions on motorized uses are needed to address motorized travel impacts to watersheds, water quality, fisheries, soil integrity, air quality, wildlife habitat/security, restore forest connectivity and reduce habitat fragmentation by motorized routes while allowing adequate access for management and recreation, reduce spread of weeds, and protect other ecologically sensitive resources and ecosystem functions. Where there are conflicts between access and recreational use and long-term protection of resources and ecosystems, we believe resource/ecosystem protection must be given priority to sustain and protect resources and ecosystems for use by future generations.

We believe motorized uses in general are more likely to accelerate erosional processes and worsen poor road/trail conditions, and increase stream sedimentation and degradation of fisheries habitat when compared to non-motorized uses. Roads/trails often tend to become wider and rutted with heavy motorized use, creating a greater need for monitoring of road/trail conditions, and for road and trail maintenance for repair and erosion control. Sediment yields are generally higher from motorized routes than from non-motorized routes. Increased motorized uses on routes with numerous stream crossings and/or routes near streams can aggravate sediment transport to streams. Weed spread is also increased by motorized uses.

Of the two action alternatives evaluated, we support Alternative 3 which will reduce adverse environmental impacts associated with roads and motorized uses more than Alternative 2. Alternative 3 has lowest mileage of roads and trails open to motorized uses; lowest open road density (1 mi/mi^2), including lowest open road density in sensitive wildlife habitats; most miles of road decommissioning (197 miles); greatest reduction of road sediment transport to streams (24.6 tons sediment reduction, Tables 25 and 26, pages 92 and 95); greatest reduction in riparian roads (31 more miles of road within 150 feet of a stream decommissioned with Alternative 3 in comparison to Alternative 2); most road culvert removals (104 more culvert removals); least motorized routes on sensitive soils; least motorized routes in IRAs; etc.). We agree with the

statement in the DEIS that Alternative 3 has the greatest potential to benefit watershed values (page 73), since it would restore the greatest amount of riparian areas and stream channels; remove more negative impacts to fisheries and aquatic species due to culverts that block fish passage and are at risk or failure; reduce more sedimentation from roads within 150 feet of streams; and restore more riparian function and floodplain connectivity (page 97).

We have the greatest environmental concerns with Alternative 1, no action, since that would not include preparation of MVUMs and would leave many unauthorized roads causing resource damages on the landscape (page 55). While Alternative 2 includes preparation of a MVUM which we support, it also includes more roads and motorized uses and less protection for watersheds, water quality, fisheries and wildlife habitat and security, and weed spread associated with increased motorized uses, in comparison to Alternative 3. The EPA considers Alternative 3 to be the environmentally preferred alternative, and encourages the Helena NF to select Alternative 3 as the preferred alternative.

Water Quality/Aquatic Habitat

3. The Blackfoot travel planning area includes Nevada, Middle Blackfoot, and Blackfoot Headwaters total maximum daily load (TMDL) planning areas as well as smaller portions of the Little Blackfoot, Dearborn, and Holter TMDL planning areas (page 63). We appreciate the identification of water quality impaired waterbodies, listed by the Montana Department of Environmental Quality (MDEQ) under Section 303(d) of the Clean Water Act, within the travel planning area (Table 17, page 65). Sediment (largely from forest roads) is identified as the principle cause of water quality impairment. We note that there are many more water quality impaired waterbodies in the Blackfoot River watershed (4th field HUC 17010203) identified on MDEQ's 303(d) listing website (http://cwaic.mt.gov/query.aspx) than are shown in Table 17. We recommend that the Table 17 list of water quality impaired waters within the Blackfoot Travel Planning Area be checked to be sure it includes all impaired waters within the travel planning area.

4. Further degradation of water quality impaired waterbodies should be avoided. The DEIS reports that the Blackfoot Headwaters TMDL (MDEQ 2008) recommended a 30 percent reduction in sedimentation from forest roads, and 100 percent reduction from non-system roads (page 65). We recommend that the Helena NF consult with MDEQ TMDL program staff to assure that the MDEQ considers the Blackfoot Travel Plan to be consistent with development and implementation of applicable TMDLs and water quality improvement and restoration of support for beneficial uses in 303(d) listed streams within the planning area (contact MDEQ staff such as Mr. Dean Yashan at 406-444-5317, and/or Mr. Robert Ray at 406-444-5319). We note that sources of pollutant loading may occur in unlisted tributaries to listed streams, and TMDLs must account for all sources of pollution; hence there is a need to address road/trail related pollution sources in the watersheds of 303(d) listed waters. We also encourage review of the MDEQ's pamphlet, ***"Understanding the Montana TMDL Process,"*** which can be downloaded at http://deq.mt.gov/wqinfo/TMDL/default.mcpx .

5. The condition of forest road/trail networks and limited funding available for route maintenance are a significant concern of EPA, since roads are often the major anthropogenic sediment source

adversely affecting hydrology, water quality, and fisheries of streams. The DEIS acknowledges that roads produce the most sediment amongst forest activities, particularly for roads located near streams, and roads can create conditions for mass soil failures and landslides if located in sensitive areas (page 87). Older roads built with outdated management practices (those dating from the 1950s to the mid-1970s), poorly maintained roads, roads near streams, and roads with numerous stream crossings greatly increase the possibility of erosion and sediment transport to streams, which can adversely impact water quality, aquatic habitat, fisheries, and channel hydrology and stability. Road/trail maintenance, erosion control, and repair are intrinsically related to travel planning. Motorized uses on roads/trails often creates a greater need for carrying out repair and erosion control.

The DEIS states that roads that receive higher amounts of motorized use would continue to be maintained on a regular basis; as would roads that need maintenance to prevent resource damage (page 53). Lower use roads would continue to receive sporadic maintenance; although the maintenance backlog would remain for the lower standard roads for all alternatives. We note that it is known that prolonged under-funding of road maintenance on National Forests has resulted in degraded road conditions, and that there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis,* March 22, 2007). Adequate funding for road maintenance and implementation of road BMPS is needed to address water quality effects of roads. Conduct of proper road maintenance and improvements to forest road systems and road BMPs and drainage improvements are critical for protecting aquatic health.

We believe road and trail networks should be limited to those that can be adequately maintained within agency budgets and capabilities. Roads which cannot be properly maintained should be decommissioned. EPA's water quality concerns are greater where routes are located near surface waters, where there are numerous stream crossings, and where routes are in poor condition. We support prioritizing decommissioning of roads close to streams rather than roads on upper slopes or ridges to maximize water quality improvement benefits.

Specific concerns include road/trail drainage and surface erosion, adequacy of waterbars, drain dips, ditch relief culverts to avoid drainage running on or along roads/trails; interception and routing of sediment to streams; unstable stream crossings and potential for washout; culvert sizing, culvert allowance of fish migration and effects on stream structure and seasonal and spawning habitats; supplies of large woody debris; open road/trail density; number of stream crossings; eliminating fords, armoring stream channels at stream crossings, graveling roads, reducing motorized uses in more erosive areas; road/trail encroachment on stream, riparian, and wetland habitats; and relocating roads/trails away from streams where possible.

While we are pleased that Alternative 3 will reduce aquatic effects of roads and motorized uses (as noted in comment #2 above), we recommend that the FEIS include additional discussion of road and trail conditions, and adequacy of road/trail maintenance and BMPs, and availability of funding to implement needed road/trail BMPs. We suggest that Appendix C include information regarding road conditions and the adequacy of road BMP maintenance for roads that will remain on the landscape. This would demonstrate that the Helena NF is evaluating road/trail conditions and water quality problems, and identifying opportunities to improve road BMPs, thus,

evidencing a commitment to implement/trail needed road maintenance and improvements in the near future. There should be a continuing road and trail inspection, evaluation and maintenance program in place to identify road/trail drainage and BMP needs, including an inspection, evaluation and road/trail maintenance program, and adequate funds to correct road/trail deficiencies.

6. We appreciate the presentation and discussion of project design and mitigation features in DEIS Chapter 2 (page 28-31), the identification of road BMPs in Appendix H. For your information EPA's general recommendations regarding roads are as follows:

   * minimize road construction and reduce road density as much as possible to reduce potential adverse effects to watersheds;

   * locate roads in uplands, away from streams and riparian areas as much as possible;

   * minimize the number of road stream crossings;

   * locate roads away from steep slopes or erosive soils and areas of mass failure;

   * stabilize cut and fill slopes;

   * provide for adequate road drainage and control of surface erosion with measures such as adequate numbers of waterbars, maintaining crowns on roads, adequate numbers of rolling dips and ditch relief culverts to promote drainage off roads avoid drainage or along roads and avoid interception and routing sediment to streams;

   * consider road effects on stream structure and seasonal and spawning habitats;

   * allow for adequate large woody debris recruitment to streams and riparian buffers near streams;

   * properly size culverts to handle flood events, pass bedload and woody debris, and reduce potential for washout;

   * replace undersized culverts and adjust culverts which are not properly aligned or which present fish passage problems and/or serve as barriers to fish migration;

   * use bridges or open bottom culverts that simulate stream grade and substrate and that provide adequate capacity for flood flows, bedload and woody debris where needed to minimize adverse fisheries effects of road stream crossings.

   Blading of unpaved roads in a manner that contributes to road erosion and sediment transport to streams and wetlands should be avoided. It is important that road grading focus on reducing road surface erosion and sediment delivery from roads to area streams. Practices of expediently sidecasting graded material over the shoulder and widening shoulders and snow plowing can have adverse effects upon streams, wetlands, and riparian areas that are adjacent to roads. These practices should be avoided.

Roads are particularly vulnerable to damage during spring breakup as overly-saturated roadbeds from winter freezing are working to dry out, and this typically occurs between March 30 and June 30, but can vary depending on the severity of the winter and spring weather conditions. We encourage avoiding road use during spring breakup conditions, and closing roads to log haul during spring break up to reduce rutting of roads that increase road erosion and sediment delivery, and graveling of haul roads. Snow plowing of roads later in winter for log haul should also be avoided to limit runoff created road ruts during late winter thaws that increase road erosion (i.e., ruts channel road runoff along roads increasing erosion and sediment transport).

We encourage routine conduct of inspections and evaluations to identify conditions on roads and other anthropogenic sediment sources that may cause or contribute to sediment to streams, and to include activities in the project to correct as many of these conditions and sources as possible. Forest Service Region 1 provides training for operators of road graders regarding conduct of road maintenance in a manner that protects streams and wetlands, (i.e., Gravel Roads Back to the Basics). If there are road maintenance needs on unpaved roads adjacent to streams and wetlands we encourage utilization of such training (contact Fred Bower FS R1 Transportation Management Engineer, at 406-329-3354).

We also note that there are training videos available from the Forest Service San Dimas Technology and Development Center for use by the Forest Service and its contractors (e.g., "Forest Roads and the Environment"-an overview of how maintenance can affect watershed condition and fish habitat; "Reading the Traveled Way" -how road conditions create problems and how to identify effective treatments; "Reading Beyond the Traveled Way"-explains considerations of roads vs. natural landscape functions and how to design maintenance to minimize road impacts; "Smoothing and Reshaping the Traveled Way"-step by step process for smoothing and reshaping a road while maintaining crowns and other road slopes; and "Maintaining the Ditch and Surface Cross Drains"-instructions for constructing and maintaining ditches, culverts and surface cross drains).

7. We fully support road storage/rehabilitation, closure and decommissioning, particularly removal of road stream crossings, and obliteration of illegally user created non-system roads causing resource damages. We are pleased that Alternatives 2 and 3 both increase road storage, closures and decommissioning, although as noted earlier we support Alternative 3 since it would close and decommission significantly more roads than Alternative 2, including closure of 34.4 miles of roads with 150 feet of streams (vs. 3.2 miles with Alternative 2, Table 22, page 77). Where roads or trails are located in narrow valleys adjacent to streams where roads/trails cannot be decommissioned, we recommend use of vegetative plantings, silt fences, and/or rock or log placement along the stream banks and/or steep slopes to reduce sediment entry into the streams.

   Reductions in road density are an important means of improving watershed health. Areas with higher road density have been correlated with higher levels of stream sedimentation, fisheries impacts, and greater levels of fragmentation of wildlife habitat. Higher quality aquatic habitat and higher populations of fish are often associated with watersheds with low road density. We support reductions in road density, particularly removal of road stream crossings, and closing and obliterating user created non-system roads that cause resource damages.

We note that it is difficult to effectively restrict motorized access and protect public lands with simple gated route closures. Route rip-seed-slash (obliteration or full route recontour) is a more effective, and thus, preferred method of closure. It is important that adequate attention be directed to restoring natural drainages and culvert removal and revegetating natural landscapes by ripping, scarifying, and seeding disturbed areas with native seed. We are pleased that the Helena NF is proposing to restore stable drainage ways during route removal to address water quality concerns with proposed road storage and decommissioning actions in the Blackfoot Travel Plan.

8. We are also pleased that Helena NF staff recognize that undersized or poorly positioned road culverts at road stream crossings can increase risks of culvert failures that can exacerbate stream sedimentation (page 66). During a flood event, especially following a wildfire, a culvert can become obstructed or overwhelmed by the magnitude of flow. The consequence of culvert failure is often the erosion and entrainment of road fill around the culvert. We appreciate the inclusion of information on the number of road stream crossings within Blackfoot travel planning area watersheds (DEIS Tables 18 and 19, pages 66-67), and are pleased that Alternative 3 will remove 121 road culverts to reduce stream sedimentation risks associated with culverts (page 41). We note that only 17 culverts would be removed with Alternative 2 (Table 22, pages 76).

9. Alternative 2 proposes construction of 2 miles of new motorized trail (page 19), and Alternative 3 proposes construction of 3 miles of new motorized trail and 0.5 miles on new road (page 22). It is important that new roads and motorized trails be located to avoid sensitive soils and erosion hazards and to minimize impacts to sensitive aquatic and terrestrial habitats. The project design and mitigation measures state that new <u>non-motorized trails</u> would be planned and constructed to avoid sensitive areas, using all INFISH and BMPs to minimize impacts to habitat (page 29). It is not clear to us, however, why such a project design and mitigation measure would not state that new <u>motorized and motorized trails and roads</u> would be planned and constructed to avoid sensitive areas, using all INFISH and BMPs to minimize impacts to habitat. Why are motorized trails not included in this design feature/mitigation measure to avoid sensitive areas? This should be explained in the FEIS.

Wetlands

10. EPA considers the protection, improvement, and restoration of wetlands to be a high priority. Executive Order 11990 requires that all Federal Agencies protect wetlands. In addition national wetlands policy has established an interim goal of **No Overall Net Loss of the Nation's remaining wetlands**, and a long-term goal of increasing quantity and quality of the Nation's wetlands resource base. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include damage or improvement to: water quality, habitat for aquatic and terrestrial life, channel & bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Roads and motorized uses in or near wetlands and riparian areas have potential to affect wetland integrity and function.

It is important that appropriate limitations and restrictions be placed on motorized vehicle use to protect against degradation of wetlands. Wetland impacts should be avoided and then be Minimized to the maximum extent practicable, and unavoidable impacts should be compensated for through wetland restoration, creation, or enhancement. The DEIS states that "wetlands, seeps and springs would be protected from ground disturbance in the design features for this project" (page 289), although we did not see wetlands discussed in the Chapter 2 project design features (pages 28-31), other than the statement about obtaining required Clean Water Act Section 404 permits. We suggest that the project design features in Chapter 2 of the FEIS more definitively indicate that wetlands, seeps and springs be protected from ground disturbance as is stated in the Threatened, Endangered and Sensitive (TES) Plants section of the DEIS in Chapter 3 (e.g., pages 288, 289).

We are pleased that the DEIS states that "there would be no measurable effect to wetlands .... from implementing this project" (page 334); and that the Appendix H road BMPs state that "sensitive areas such as riparian areas, wetlands, meadows, bogs, and fens, should be avoided to the extent practicable" (page 515). Although we recommend that a statement be added to the mitigation measures and BMPs indicating that if impacts to wetlands do occur, such impacts will be mitigated (i.e., mitigation means sequence of avoidance, minimization, rehabilitation, and compensation for unavoidable impacts to wetlands).

Recreation

11. We appreciate the discussion of recreation in the DEIS (beginning on page 118), including the table of Recreation Opportunity Spectrum (ROS) allocating acres of outdoor recreation by natural resource setting for the travel planning area (Table 31, page 119). The planning area predominately falls into the Roaded Natural, Semi-primitive Motorized, and Semi-primitive Non-Motorized categories due to past and current development, such as roads associated with timber harvest and mining activity. The DEIS states that most wheeled motorized use takes place on open roads with the exception of a few system trails.

    While we recognize that a balance of motorized and non-motorized recreational opportunities need to be provided, as noted earlier we believe that motorized uses contribute more to resource and environmental damage than non-motorized uses. Motorized uses push wildlife onto smaller and smaller patches of habitat; reducing migration corridors; increasing adverse effects to wildlife habitat and security; causing soil erosion and adverse effects to water quality and aquatic habitat and fisheries; spreading weeds; and increasing opportunity for vandalism of historic properties. Motorized uses also have the potential to degrade the quality of experience and solitude desired by non-motorized uses (e.g., hiking, viewing natural features and wildlife).

    Alternative 1 (no action) and Alternative 2 provide the greatest opportunities for such impacts from motorized uses, and least opportunities for non-motorized recreation without effects of motorized uses. We support increasing opportunities for non-motorized uses such as viewing wildlife or natural features in solitude, as well as reducing environmental and resource impacts. We believe motorized activities should occur in a manner and location that minimize effects to the environment and other public uses. Accordingly, we support Alternative 3 that provides greater limitations on motorized uses to allow greater levels of protection for water quality,

fisheries, wildlife, natural features, and other resources that are used by the public.

12. Both action alternatives would allow wheeled motorized vehicle travel for camping (and parking associated with camping) within 300 feet of designated system routes, including roads and trails (unless signed otherwise), and with a few other requirements such as not creating permanent routes, avoiding damaging to vegetation, soils, and water resources, not crossing streams and riparian areas. We acknowledge the need for the public to have access to dispersed camping sites, and have no objections to the 300 foot motorized access provision for camping sites as long as the requirements to protect important and ecologically sensitive resources are included.

    EPA does encourage locating campground facilities, and concentrated public recreational uses away from important or ecologically sensitive resources. ATV and OHV use is common at dispersed campsites. We recommend identifying and/or designating camping sites to avoid sensitive areas as much as possible, and encouraging camping or concentrated public use in areas that are more resilient and that can more easily recover from impacts and/or accommodate public use with fewer impacts. We recommend that the Helena NF identify specific dispersed camping sites where the 300 foot motorized travel limitation would be used, based on adequacy of the limitation to avoid damage to important or ecologically sensitive resources during motorized travel at campsites. We also suggest consideration of a 30 foot no drive zone adjacent to streams, ponds, lakes, marshes, and wetlands.

Law Enforcement

13. Executive Orders 11644 and 11989, "Use of Off-Road Vehicles on Public Lands," require agencies to ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among users. We appreciate the discussion of law enforcement in the DEIS (pages 51, 54, 56, 121). We agree that user compliance of Forest regulations on roads and trails is generally related to the level of user understanding of the sign system and available maps. MVUMs that clearly identify designated motorized routes, supplemented by signs on the ground should promote public understanding of travel restrictions.

    However, we also believe that policing and enforcement are needed to promote travel plan compliance, and better ensure protection of water quality, fisheries, wildlife, and other sensitive resources. We have concerns regarding the adequacy of resources to enforce travel restrictions necessary for protection of sensitive resources and the environment. It would be helpful if the FEIS would identify the number of full time law enforcement officers stationed on the Helena NF, Lincoln Ranger District, who will be available to police the travel planning area and issue citations for travel management violations.

    We are pleased that the Helena National Forest understands that enforcement of the travel plan restrictions would require additional emphasis by the Forest (page 121), and that enforcement assistance may be provided by Montana Fish, Wildlife and Parks, and the public. We support provision of adequate law enforcement personnel to handle the increases in motor vehicle uses occurring on the Forest, particularly increasing enforcement in regard to off-road vehicle users and those violating motorized access restrictions on closed roads and trails, and increasing enforcement staffing on holidays and weekends, when much illegal motor vehicle use occurs.

Wilderness/Wilderness Study Areas/Roadless Areas

14. There are seven Inventoried Roadless Areas (IRAs) within the Blackfoot planning area (page 130), with approximately 76 miles of existing motorized routes within IRAs (page 133). Motorized recreation within IRAs and wilderness study areas has potential to adversely affect roadless and wilderness values, especially in recognition of trends of increasing public use of OHV's and ATVs that can access previously inaccessible lands and cause resource damages. Under Alternative 2, there would be a decrease of 18 miles of motorized routes within IRAs (page 134), and with Alternative 3 a decrease of 45 miles of motorized routes within IRAs (page 139).

    We support the greater reduction in motorized routes within IRAs proposed with Alternative 3, although we have some concern that with Alternative 3 there would still be 31 miles of motorized routes within IRAs (page 139). Will the remaining 31 miles of motorized routes within IRAs with Alternative 3 and especially the 58 miles of motorized routes with IRAs with Alternative 2, allow the solitude and pristine characteristics of such areas to be adequately maintained or protected?

    EPA supports protection of the pristine character and integrity of remaining minimally disturbed roadless and wilderness study areas to prevent further fragmentation and degradation of wildlife habitat, and to maintain or restore solitude and primitive recreation characteristics in such areas. Roadless and wilderness study areas often provide population strongholds and key refugia for listed or proposed species and narrow endemic populations due to their more natural undisturbed character. One of the National Strategic Goals regarding the use of motorized equipment in wilderness (FSM 2326.02) is to "Exclude the sight, sound, and other tangible evidence of motorized equipment or mechanical transport within wilderness, except where they are needed and justified."

    It is not clear whether this goal would be met in the IRAs in the Blackfoot travel planning area with so many motorized routes remaining within IRAs. Site visits to IRAs with motorized routes may be required to confirm whether sight, sound or odor from motorized uses are tangible. If there are likely impacts, the Forest should indicate whether motorized use that causes adverse impact is "needed and justified." It is important that our last remaining roadless and wildlands remain unspoiled and natural in order to provide clean water and air, sanctuary for native wildlife and plant species, and opportunities for low impact human recreation.

    We encourage the Helena NF to adequately restrict motorized uses in IRAs and wilderness study areas to maintain or restore solitude and primitive recreation characteristics in such areas and prevent fragmentation and degradation of wildlife habitat. Motorized routes created by cross-country travel in IRAs and wilderness study areas should be obliterated and revegetated, with closures policed and enforced.

Invasive Plants/Noxious Weeds

15. We are pleased that the DEIS includes discussion of travel management impacts on the spread of invasive plants and noxious weeds (pages 252-265). Noxious weeds are a great threat to biodiversity. Weeds can out-compete native plants and produce a monoculture that has little or

no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem, such as road/trail construction and where off-road vehicles disturb soils.

The DEIS states that approximately 25,514 acres of mapped noxious weed infestations occur within the Blackfoot travel planning area with 12,435 acres of weed infestations within 100 feet of open or closed roads and trails, and 4,755 acres of weed infestations along motorized routes (and only 47 acres along non-motorized routes (page 252).

EPA supports the need to minimize noxious weed infestations. Motorized uses are a major contributor to the spread of weeds. In fact, we believe motorized vehicles—cars, trucks, ATVs, motorcycles, may be the greatest vector for spread of weeds. This is borne out by the statement in the DEIS (page 253), stating that roads have high weed infestations since vehicles carry weed seeds which are dispersed along travelways; roads are disturbed by maintenance activities on a regular basis providing a ready seedbed for weed seeds; and human use is concentrated along roadsides which increases the exposure of these areas to noxious weed seed dispersal and ground disturbance. We note that a single vehicle driven several feet through a knapweed site can acquire up to 2,000 seeds, 200 of which may still be attached after 10 miles of driving (Montana Knapweeds: Identification, Biology and Management, MSU Extension Service.)

An effective noxious weed control program should include restrictions on motorized uses, particularly off-road uses. Off-road vehicles are designed to, and do, travel off-trail, disturbing soil, creating weed seedbeds, and dispersing seeds widely. Weed seed dispersal from non-motorized travel is of lesser concern because of fewer places to collect/transport seed, and the dispersal rate and distances along trails are less. Table 6 comparing alternatives (page 44) indicates that Alternative 3 is the least likely alternative to promote the introduction, establishment and spread of invasive species/noxious weeds. For your information, measures we often recommend for preventing spread from source areas to uninfested areas include:

- < Ensure that equipment tracks and tires are cleaned prior to transportation to an uninfested site.
- < Focus weed control efforts at trail heads and transportation corridors to prevent tracking of seed into uninfested areas.
- < Attempt to control the spread from one watershed to another to reduce water as a transport vector.
- < If a localized infestation exists and control is not a viable option, consider rerouting trails/roads around the infestation to reduce available vectors for spread.
- < Establish an education program for industrial and recreational users and encourage voluntary assistance in both prevention and control activities.
- < Reseed disturbed sites as soon as possible following disturbance.

Wildlife/Threatened & Endangered Species

16. The DEIS states that forest roads and overall road density have the potential to affect the quality of wildlife habitat, including habitat security for wildlife, wildlife dispersal and travel, including species such as the threatened grizzly bear (page 142). Roads and motorized uses increase

wildlife encounters with humans which can result in habitat degradation, displacement, increased wildlife mortality, changes in behavior, increased stress, and reduction of reproductive success. We appreciate the DEIS discussion of road effects on wildlife (pages 150-153).

We support adequate limitations on motorized travel and open motorized road and trail density for protection of wildlife habitat and security, and key corridors for wildlife migration. The Travel Plan should avoid and minimize adverse impacts upon species of special concern, and contribute to recovery of listed species, and maintain and protect high quality wildlife habitat and linkage corridors for productive and diverse populations of wildlife species (species viability). Wildlife connectivity and security should be maintained or improved and wildlife fragmentation and displacement from roads and motorized uses reduced.

We are pleased that the DEIS recognizes that controlling and directing motorized access is one of the most important tools in achieving habitat effectiveness and managing recovery of the threatened grizzly bear (page 153). The DEIS states that Alternative 3 results in the greatest reduction of open road densities, providing greater benefit to those species sensitive to road densities (page 198); and that implementation of the proposed activities in Alternatives 2 and 3 "may affect, but are not likely to adversely affect" the grizzly bear or its habitat (page 202). The DEIS also states that all alternatives "may affect, but are not likely to adversely affect" the threatened Canada lynx or lynx critical habitat (page 214), but also states that Alternative 3 has the least potential to affect the threatened Canada lynx or the functionality of lynx critical habitat due to the fewest miles of open routes and the most seasonally restricted routes.

Accordingly, Alternative 3 appears to best address wildlife and T&E species concerns associated with roads and motorized uses. We recommend that the final EIS and Record of Decision include documentation of U.S. Fish & Wildlife Service's concurrence with the biological assessment upon listed species. If the consultation process is treated as a separate process, the Agencies risk USFWS identification of significant impacts, perhaps additional mitigation measures, or changes to the preferred alternative.

Monitoring

17. There should be an effective program for monitoring, evaluation and adaptive management to assure that effects of travel management are identified and management modified where necessary to reduce adverse effects. As noted in earlier comments, we are concerned about effects of roads/trails and motorized uses on water quality, aquatic habitat and fisheries, as well as other resources such as wildlife habitat, weeds and sensitive plants. Given the acknowledged impact of roads/trails and motorized uses use on water quality and fisheries and other resources such as wildlife, weeds, sensitive plants, etc., it is important to monitor effects of travel and public recreation on these resources, and identify problems or undesirable or unexpected results or conditions, so they can be mitigated. It is through the iterative process of setting goals and objectives, planning and carrying out travel management, monitoring impacts of travel management, and feeding back monitoring results to managers so they can understand effects and make needed adjustments to mitigate effects, that adaptive management works.

We did not see much discussion of Blackfoot Travel Plan monitoring in the DEIS in regard to identifying effects of Plan implementation, particularly use of designated motorized routes to assess effects and problems. We recommend that the FEIS provide additional disclosure in regard to potential outcomes related to monitoring of travel management. For example, stating that roads or trails will be closed if monitoring shows that motor vehicle use is causing or will cause considerable adverse effects on public safety or water quality, fish habitat, soil, vegetation, wildlife, wildlife habitat, or cultural or historic resources.

We also recommend that mechanisms for public disclosure of the monitoring analysis and the decisions for the Travel Plan be provided. The roles of the Forest Service, other Agencies, independent science, and the public in monitoring should be identified. The FEIS should discuss the future decision points in the adaptive management process that may require additional NEPA analysis. The FEIS should also discuss resources and funding availability for monitoring and adaptive management in regard to effects of travel. We are concerned about adequacy of resources for monitoring, since monitoring is often inadequately funded.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.