

Ravalli County Commissioners Office

From: Dan and Karen Thompson <dkthomps@yahoo.com>
Sent: Saturday, December 5, 2015 9:15 AM
To: Ravalli County Commissioners Office
Subject: Meadow Vapor Comments
Attachments: Scoping comments.docx; Scoping_road_data_rcorua.xlsx.pdf; Travel Plan Map.pdf

Attached are scoping comments by the Ravalli County Off Road User Association for the proposed Meadow Vapor project. I understand that the Commissioners will be meeting with the Forest Service next week concerning this proposal. Hopefully, RCORUA's comments will be useful to you for that meeting.

Dan Thompson
531-3103



Ravalli County Off Road User Association

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December 3, 2015

Eric Winthers, District Ranger
Darby/Sula Ranger District
PO Box 388
Darby, MT 59829

Dear Ranger Winthers,

This letter constitutes the Scoping comments from the Ravalli County Off Road User Association (RCORUA) for the proposed Meadow Vapor project as outlined in your letter dated November 17, 2015. RCORUA is a group of about 350 citizens from Ravalli County who advocate for active management of Forest lands to improve the resilience of our forests to wildfire and insect infestations, and to improve all forms of recreational experiences on those lands. RCORUA members often pursue their recreational interests in the proposed project area and will be directly affected by the outcome of this project. We respectfully request that these comments be included as part of the administrative record for the Meadow Vapor project and that RCORUA continue to be considered as an interested party as the project proceeds through the NEPA process.

RCORUA Supports Vegetation Management

RCORUA enthusiastically supports the vegetation management proposed by this project, including commercial and noncommercial thinning and fuel reduction activities. Reducing the susceptibility of our forests to extreme fire and insect infestation events is critical to managing the adverse environmental consequences of those events. At the same time it preserves our forestlands for enjoyable recreational public uses. We concur that this project will provide additional protections from uncontrollable wildfires for the residents of Springer and adjacent residents. RCORUA extends unqualified support for these activities.

Expand Project Area

RCORUA recommends that the project area be expanded to include the area between Meadow and Lick Creeks, complete with prescriptions for vegetation management of the area. This area is in need of treatment and contains several roads and trails that are of interest to RCORUA members. Indeed, we would have no objections if the project area were expanded to include the Needle Creek drainage and/or other area drainages. We point out that there are no statutory obstacles to vegetation management activities in Inventoried Roadless Areas.

Respect Area Boundaries

It is inappropriate to nominate roads or trails outside the project area boundaries for consideration as part of the project. By definition, boundaries are in fact boundaries and

should be respected. Inclusion of roads and trails outside project area boundaries allows the Agency unlimited freedom for road and trail decommissioning and enables arbitrary and capricious choices on the part of the Agency. We strongly recommend that either the project area boundaries be changed (complete with vegetation management prescriptions) or that roads and trails outside the project area be deleted from the project.

Ensure Consistency With the BNF Travel Plan

Several of the proposed road and trail treatments proposed for this project are not consistent with the BNF current or proposed Travel Management plans. While the new BNF Travel Plan is not yet finalized, it probably will be in place by the time the Meadow Vapor project is finalized. The Agency must ensure that the Meadow Vapor proposals are consistent with the BNF Travel Plan. RCORUA has identified inconsistencies with Roads 5771 and 73599, but there may be others. See attachments for more detail.

No Treatment for Roads More Than 300' From Streams

The Agency states that the purpose of treating decommissioned and stored roads with heavy machinery is to minimize transport of sediment to streams. At the same time, the Agency acknowledges that sediment mobilized from roads that are more than 300' from a stream is highly unlikely to reach the stream. The idea is that vegetation between the road and the stream efficiently intercepts and stabilizes the sediment, preventing it from entering the stream.

One then has to wonder why the Agency proposes heavy-handed and expensive treatments for roads that are not adjacent to streams.

RCORUA suggests that the Agency refrain from decompacting or recontouring roads or road segments that are more than 300' from active streams. At the very least, the Agency should provide technical justification for continuing this practice if that is what they choose to do.

Road Treatments

RCORUA does not support the practice of treating decommissioned or stored roads with heavy machinery. In our collective experiences, decompacting or recontouring road prisms often causes more harm than good. And it is extraordinarily expensive. Funds allocated for these expensive treatments that have questionable benefits could better be spent maintaining our existing infrastructure.

The most common argument brought forward to support the practice of decompacting roadways is that it improves water infiltration rates and reduces the likelihood of sediment transport to streams. This argument assumes that improving infiltration rates is desirable. In the Bitterroot National Forest, our native soils are derived from granitic and metasedimentary rocks and have very high porosities, permeabilities, and infiltration rates. As a result, it is difficult to retain water in the shallow soils to promote plant growth. Empirical evidence for this assertion is abundant in the BNF where abandoned roadways support the earliest and most robust vegetation. That's because roadways collect and retain water better than the surrounding native soils. Indeed, these vegetated roadways serve as efficient traps for sediments that could otherwise be transported to streams.

Similar arguments are often put forward for the practice of obliterating road prisms by recontouring them, seeding, mulching and fertilizing the recontoured surface. These practices are sometimes successful in gentle terrain where water is available, but are rarely successful in steep dry terrain in the long term. Most recontoured roadways are slow to revegetate, susceptible to erosion, and invite massive weed infestations. Recontouring a roadway involves far more ground disturbance than building a new road and results in a wider canopy opening as well. If ground disturbance promotes sediment transport and weed infestations as claimed by road opponents, then that logic should be applied to recontouring as well.

RCORUA does not support the practice of blocking the entrances to decommissioned roads by recontouring, for all of the reasons mentioned above. Proponents of this practice claim that it improves the viewscape and is more “natural” in appearance. Given that land management agencies are chronically underfunded and that our forests are in dire need of ecological management, RCORUA asserts that we cannot afford purely cosmetic treatments. Entrances to decommissioned or stored roads should be blocked by gates, barricades, or tank traps. These devices are far less expensive, equally effective, and involve less ground disturbance than recontouring entrances.

Finally, extreme treatments of decommissioned or stored roads essentially prevents those roads from ever being used again for any purpose. RCORUA is amazed that anyone would claim to have the ability to predict which roads might be useful in the future for wildfire, vegetation management, or recreational purposes.

RCORUA advocates for treatment of decommissioned roads that involves minimal disturbance to soils and existing vegetation. We support removal of culverts and the reestablishment of a more natural drainage profile for stream crossings; weed treatments prior to decommissioning; and the retention of trails for hikers, stock users, and wildlife on decommissioned roads. The entrances to decommissioned or stored roads should be blocked with gates, barricades, or tank traps.

Complete the Meadow-Lick Creek ATV Route

The BNF Travel Plan includes the designation of an ATV loop route in the Meadow and Lick Creek area. This designated route utilizes Roads 5770 and 5771 along with a new short connector trail to form a highly desirable and sustainable ATV route (see attached map). RCORUA strongly recommends that the completion of this route be included as part of the Meadow Vapor project. The elements of this recommendation would include:

- Decommissioning the appropriate segment of Rd 5770, designating it as a system trail, and reconstructing it as an ATV trail;
- Decommissioning the appropriate segment of Rd 5771, designating it as a system trail, and reconstructing it as an ATV trail;
- Construction of a short connector ATV trail (RD-DARD-09 on the attached map) between the ends of Rds 5770 and 5771.

We point out that inclusion of this proposal is entirely consistent with the recommendations of the Montana Forest Restoration Committee for restoration projects (Principle 13). RCORUA

volunteers would be available to assist in the construction/reconstruction activities for this route.

Conclusion

RCORUA is grateful for the opportunity to provide Scoping input and suggestions for the Meadow Vapor project. We hope the BNF will feel free to contact us if you require any additional information or clarification.

Respectfully Submitted,

Dan Thompson, Road and Trail Coordinator
Ravalli County Off Road User Association
406-531-3103

Enclosures:

Map of a portion of the BNF Travel Plan
Road spreadsheet w/RCORUA suggested changes

Meadow Vapor Scoping - Proposed Road Treatments w/RCORUA comments

Road Number	Total Road Miles	Treatment Miles	Type of Road	Proposed Treatment	Existing Condition/Recommended Treatment	RCORUA Scoping Comments
Decommission						
5770b	0.5	0.5	UND	Decommission	This road leaves 5770 in Section 1, follows on the contour for approximately ¼ mile and ends before the stream crossing. No vehicle use was observed. The road surface is compacted with some grass cover. Recontour road to decommission.	No recontour. Block entrance.
13332	1.6	0	UND	Decommission	Road naturally recovering, no existing vehicle access. No additional work needed to decommission road.	
13362	0.5	0.5	NFSR	Decommission	Road mostly open with compacted soils. Recontouring needed to decommission.	No recontour. Block entrance.
73267	0.2	0	UND	Decommission	Road naturally recovering, no existing vehicle access. No additional work needed to decommission road.	
73272	3.8	0	UND	Decommission	Road previously treated with Meadow Mink Springer project. No additional work necessary to decommission.	
73319	0.1	0	UND	Decommission	Road previously treated, no work necessary to decommission.	
73552	0.2	0	UND	Decommission	Road naturally recovering, no existing vehicle access. No additional work needed to decommission road.	
73553	0.5	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73554	0.2	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73556	0.5	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73557	0.9	0.1	UND	Decommission	73555 to junction with 5771. Recontour entrance at 5771 junction to decommission road.	No recontour. Block entrance.
73558	0.9	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73559	0.3	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73560	0.6	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73561	1.2	0	UND	Decommission	Road naturally recovering, no existing vehicle access. No additional work needed to decommission road.	
73568	0.5	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73569	0.5	0.1	NFSR	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73584	0.5	0.4	UND	Decommission	No existing vehicle access. Recontour the first 0.4 miles (second draw) to decommission.	No recontour. Block entrance.

Road Number	Total Road Miles	Treatment Miles	Type of Road	Proposed Treatment	Existing Condition/Recommended Treatment	RCORUA Scoping Comments
73585	0.4	0.1	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73587	0.9	0.9	UND	Decommission	No existing vehicle access. Recontour to decommission.	No recontour. Block entrance.
73589	0.7	0.7	NFSR	Decommission	Motorized vehicles can access the road and minor use was observed. The road surface is compacted. Recontour to decommission.	No recontour. Block entrance.
73591	2.6	0	UND	Decommission	Terrace – no road on ground. No work needed.	
73593	0.4	0	UND	Decommission	Terrace – no road on ground. No work needed.	
73594	0.5	0	UND	Decommission	Terrace – no road on ground. No work needed.	
73595	0.7	0	UND	Decommission	Terrace – no road on ground. No work needed.	
73596	0.2	0	UND	Decommission	Terrace – no road on ground. No work needed.	
73597	0.2	0	UND	Decommission	Terrace – no road on ground. No work needed.	
Decommission						
73599	2.6	2.3	NFSR	Decommission	Store to switchback at end of road by decompacting road surface and recontouring entrance. Decommission last 1,000 feet at the end of the road to private land (no treatment needed on this piece of road but ensure no access beyond the saddle).	This road currently is assigned an R4 travel status, and that status is continued in the BNF Travel Plan. This road has ATV access around the gate and is used by ATV's. It is also frequently used for foot traffic by hunters during hunting season. This road is high and dry and presents no watershed issues. There is no access to private land from this road. Remove this road from the project.
73603	0.8	0.1	NFSR	Decommission	Road was previously stored with the culvert pulled and entrance blocked. Recontour entrance to decommission.	No recontour. Block entrance.
73634	0.3	0	UND	Decommission	Road naturally recovering, no existing vehicle access. Recontour entrance to decommission.	No recontour. Block entrance.
73636	0.6	0.3	UND	Decommission	No existing vehicle access. Recontour the first 0.3 mile to decommission.	Some segments of Rds 73635, 73636, and/or 73637 are currently being used as an ATV "go around" for the gate on Rd 5770. This "go around" should be preserved or access around the gate provided. No recontour. Block entrance.
73637	0.4	0.2	UND	Decommission	No existing vehicle access. Recontour entrance and first 0.2 miles of the road to decommission.	No recontour. Block entrance.
73638	0.7	0.3	UND	Decommission	No existing vehicle access. Recontour entrance and first 0.3 miles of the road to decommission.	No recontour. Block entrance.
73639	0.6	0.3	UND	Decommission	No existing vehicle access. Recontour entrance and first 0.3 miles of the road to decommission.	No recontour. Block entrance.
73795	0.1	0.1	UND	Decommission	Short spur road with some OHV use noted. Recontour to decommission.	No recontour. Block entrance.
73795	0.3	0.1	UND	Decommission	Recontour entrance and first 0.1 miles of the road to decommission.	No recontour. Block entrance.
73797	0.7	0	UND	Decommission	Road is mapped but was located on a ridge and found no cut/fill or evidence of the road during field review. No additional work needed to decommission.	
73798	0.2	0	UND	Decommission	In area of terraces, couldn't find a prism for this road. No additional work needed to decommission.	

Road Number	Total Road Mles	Treat-ment Miles	Type of Road	Proposed Treatment	Existing Condition/Recommended Treatment	RCORUA Scoping Comments
73799	0.2	0	UND	Decommission	In area of terraces, couldn't find a prism for this road. No additional work needed to decommission.	
73800	0.1	0	UND	Decommission	In area of terraces, couldn't find a prism for this road. No additional work needed to decommission.	
73801	0.4	0	UND	Decommission	No existing vehicle access. Road planted with ponderosa pine, minor cut/fill, not accessible without major reconstruction. No additional work needed to decommission.	
73802	0.3	0	UND	Decommission	Road planted with ponderosa pine, minor cut/fill, not accessible without major reconstruction. No additional work needed to decommission.	
74813	0.1	0	UND	Decommission	Road naturally recovering, no existing vehicle access. No additional work needed to decommission road.	
74814	0.2	0	UND	Decommission	Road naturally recovering, no existing vehicle access. No additional work needed to decommission road.	
74815	0.3	0.1	UND	Decommission	Minimal road prism present, grown in with vegetation, no existing vehicle access, recontour entrance to decommission.	No recontour. Block entrance.
74816	0.1	0	UND	Decommission	Short spur out ridge, no additional work needed to decommission.	
74817	0.2	0.1	UND	Decommission	No existing vehicle access. Vegetation recovering, douglas fir planted on the outside bank. Recontour entrance to decommission.	No recontour. Block entrance.
73573	0.2	0.2	NFSR	Decommission	Road blocked at junction with 5778, no motorized access, road closely parallels Tepee Creek and runoff from spring eroding a gully in the road, recontour road to decommission.	Could not find this road on the map. No recontour. Block entrance.
Total	29.5	8.1				

Storage						
5771	1.5	0	NFSR	Store	Road naturally recovering, no existing vehicle access. No additional work needed to store road.	BNF Travel Plan designates this segment of 5771 as an ATV trail. Decommission as a road, convert to ATV trail, and connect to 5770 in compliance with Travel Plan.
73264	0.8	0.1	NFSR	Store	Recontour entrance to store.	No recontour. Block entrance.
73555	1.6	0.1	NFSR	Store	Road naturally recovering, no existing vehicle access. Recontour entrance to store	No recontour. Block entrance.

Road Number	Total Road Miles	Treatment Miles	Type of Road	Proposed Treatment	Existing Condition/Recommended Treatment	RCORUA Scoping Comments
73557	0.6	0.1	UND	Store	No existing vehicle access. Store west of junction with 73555. Recontour entrance at 5771 junction to store road.	No recontour. Block entrance.
73563	1.1	1.0	NFSR	Store	Vehicle access blocked. Remove crossings and recontour draws. Recontour entrance to store.	No recontour. Block entrance.
73564	0.9	0.1	UND	Store	Road naturally recovering, no existing vehicle access. Recontour entrance to store.	No recontour. Block entrance.
73565	0.4	0.1	UND	Store	Road naturally recovering, no existing vehicle access. Recontour entrance to store.	No recontour. Block entrance.
73567	0.5	0	UND	Store	Road naturally recovering, no existing vehicle access. No additional work necessary to store.	
73599	2.6	2.3	NFSR	Store	Store 2.3 miles to switchback at end of road by decompacting road surface and recontouring entrance.	This is a system road with an R4 travel status defined by the BNF Travel Plan and is used by ATVs. Remove from project.
73570	1.4	0	UND	Store	Road naturally recovering, no existing vehicle access. No additional work needed to store road.	
73586	0.3	0.3	UND	Store	Decompact road surface and recontour entrance to store.	No decompacting or recontouring. Block entrance.
73590	0.4	0.1	UND	Store	Road naturally recovering, no existing vehicle access. Recontour entrance to store.	No recontour. Block entrance.
73592	1.3	0	UND	Store	Already treated on ground, no existing vehicle access. no additional work needed to store.	
73600	0.4	0.4	UND	Store	Road is compacted with weeds, no use by motorized vehicles. Decompact and recontour entrance to store.	No decompacting or recontouring. Treat for weeds & block entrance.

Total 13.8 4.6

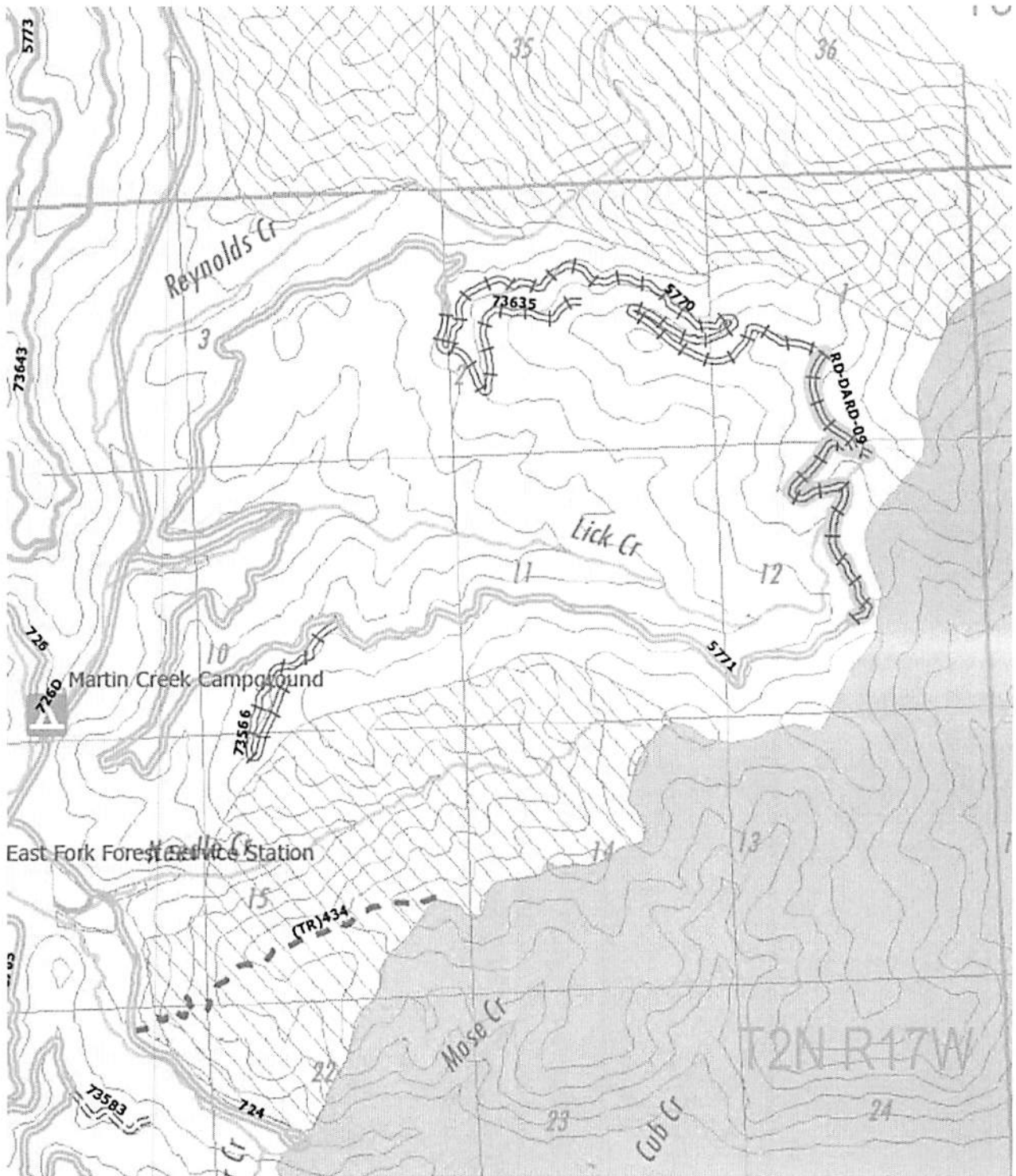
Maintenance/BMP upgrades						
5764	0.6	0.6	NFSR	Maintenance	Gravel stream crossings	
5764	6.6	0.8	NFSR	Maintenance	Gravel stream crossings	
73566	1	0.7	NFSR	Maintenance	Improve and install additional waterbars to reduce surface erosion.	
73582	4.1	0.2	NFSR	Maintenance	Gravel crossings, improve access around gates.	Rd 73582 has a travel code of R4 and is frequently used by ATV riders from Springer and elsewhere. The road is gated on both ends, but access around those gates is difficult and could be hazardous for older or inexperienced riders.
73601	0.8	0.8	NFSR	Maintenance	Water bar road at the conclusion of the project.	
73635	1.6	0.2	NFSR	Maintenance	Install waterbars to stabilize the surface and reduce erosion.	

Total 14.7 3.3

Convert to Trail	

Road Number	Total Road Miles	Treatment Miles	Type of Road	Proposed Treatment	Existing Condition/Recommended Treatment	RCORUA Scoping Comments
5770				Decommission and convert to system trail		BNF Travel plan designates segment of this road as an ATV trail. Decommission as a road, convert to a system trail, and build connector to 5771 in compliance with the Travel Plan.
5771				Decommission and convert to system trail		BNF Travel plan designates segment of this road as an ATV trail. Decommission as a road, convert to a system trail, and build connector to 5770 in compliance with the Travel Plan.
5765	0.2	0.2	UND	Decommission and convert to system trail	Trailhead to McCart Lookout. No work necessary to convert to system trail.	
Total	0.2	0.2				

Rehabilitation of User-Created Trails						
User made trails	NOT MAPPED	<2	User-made	Obliteration	Non-system, user made trails in the vicinity of Reynolds Creek and Road 432, that are scattered across the low gradient area, one leads to the stream. Should block, decompact and revegetate, leave access for dispersed camping where no resource damage would occur.	Generally concur, but would like to see more details, particularly with regard to access to dispersed camp sites.
Total		<2 miles				



**REYNOLDS-LICK CREEK AREA
TAKEN FROM THE FEIS FOR THE BNF TRAVEL PLAN**