



File Code: 1950

Date: July 13, 2004

Subject: Clancy-Unionville Project

To: Participants in the Clancy-Unionville Project

I signed the Clancy-Unionville project Record of Decision in February 2003. My decision was upheld on appeal. However, I informed you by letter in June of 2003, that the Helena National Forest did not intend to conduct the vegetative management actions authorized by the project decision until the spring of 2004. I also informed you in my letter that, the Helena National Forest's schedule of implementation would allow it to consider new information prior to implementing the vegetative actions proposed by the Clancy-Unionville project. Specifically, we expected new information concerning water quality as the EPA had scheduled to complete development of the TMDL for the Lake Helena watershed, including Lump Gulch, in August/September of 2003.

Attached is our Supplemental Information Report (SIR) Summary considering new information since the February 2003 Clancy-Unionville Record of decision. The SIR consists of the summary and three detailed reports. Of the three reports, one report deals with the new water quality information, one report concerns new old growth information, and one report concerns new wildlife information.

The following is a brief overview of the new information considered.

New Information:

Water Quality

Since my June, 2003 letter informing you that the Helena National Forest would consider new water quality information, the EPA has since altered their schedule for completion of the Lake Helena TMDL. Their present schedule does not anticipate completion of the TMDL until November 2004. Much work, however, has gone into the development of the TMDL. The Forest Service, in particular, has worked diligently to collect and provide to the EPA all data requested in a timely manner in order to complete the TMDL. In this regard, the Helena National Forest in November of 2003, completed and provided to EPA a pollutant source assessment for 303(d) listed water bodies within the administrative boundary of the Helena National Forest for the Lake Helena TMDL planning area.

A detailed report titled "Clancy-Unionville Supplemental Information Report- Water Quality" (hereinafter Water Quality SIR) was completed to address this new information in relation to the existing Clancy-Unionville EIS and analysis.



Old Growth

Recently, Two new reports concerning old growth on the Helena National Forest have been completed. The Northern Region Forest and Rangeland staff completed this report using data from the Forest Inventory and Analysis (FIA) program identifying the amount of old growth forest-wide and for the landscapes on the Helena National Forest. The Helena National Forest has also completed a third order drainage map identifying the 5% managed old growth across the Forest where timber management has occurred. This includes the third order drainage in Clancy-Unionville.

An analysis titled “Clancy-Unionville Supplemental Information Report – Old Growth” (hereinafter Old Growth SIR) was completed to address this new information in relation to the existing Clancy-Unionville EIS and analysis.

Wildlife

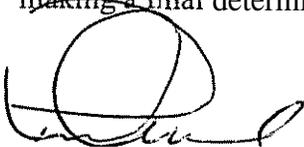
New wildlife information related to amount of habitat available for certain management indicator species (MIS) on the HNF has become available. Specifically, the new FIA data has allowed the Helena National Forest to undertake an analysis, using FIA, of the forest-wide habitat of the northern goshawk, pileated woodpecker, hairy woodpecker and the American marten. The HNF also completed an update of the results of the habitat model analysis based on the use of TSMRS data which was previously referenced in the Clancy-Unionville FSEIS. This information was updated as the wildfires of 2003 changed the baseline habitat upon which the habitat model analysis was conducted. In addition, there has been reported additional population data and trend information for certain species; including the data published in the Helena National Forest, Annual Monitoring Report, Fiscal Years 2002/03, June 2004.

An analysis titled “Clancy-Unionville Supplemental Information Report - Wildlife” (hereinafter Wildlife SIR) was completed to address this new information in relation to the existing Clancy-Unionville EIS and analysis.

In Conclusion:

The Helena National Forest currently does not intend to proceed with commercial timber harvest authorized by the Clancy-Unionville ROD until the Spring of 2005. We solicit your comments on the new information as it relates to the Clancy-Unionville FSEIS and ROD.

“The HNF’s review of the above information shows that the effects as depicted in the Clancy-Unionville Project FSEIS and Record of Decision are still valid and that additional environmental analysis in the form of a supplement to the FSEIS is not required. Nor, is there need to change the decision made in the Record of Decision. However, we would appreciate your comments prior to making a final determination.



THOMAS J. CLIFFORD
Helena Forest Supervisor

File Code: 1950
Route To: File

Date: July 13, 2004

Subject: Clancy-Unionville Summary Supplemental Information Report (FSH 1909.15 section 18.1)

To: District Ranger, Helena Ranger District

Introduction:

The Council of Environmental Quality regulations for implementing the National Environmental Policy Act at 40 CFR 1502.9 (c)(1) require the agency to prepare a supplement to either a draft or final Environmental Impact Statement (EIS) if:

- (I) The agency makes substantial changes in the proposed action that are relevant to the environmental concerns; or
- (II) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

In addition, Forest Service Handbook 1909.15 Section 18.1, further defines the procedures for complying with 40 CFR 1502.9. These procedures provide:

If new information or changed circumstances relating to the environmental impacts of a proposed action come to the attention of the responsible official after a decision has been made and prior to completion of the approved program or project, the responsible official must review the information carefully to determine its importance.

If, after an interdisciplinary review and consideration of new information within the context of the overall program or project, the responsible official determines that a correction, supplement, or revision to an environmental document is not necessary, implementation should continue. Document the results of the interdisciplinary review in the appropriate program or project file.

If the responsible official determines that a correction, supplement, or revision to an environmental document is necessary, follow the relevant direction in sections 18.2 - 18.4.

New Information:

This Supplemental Information Report (SIR) Summary considers new information since the completion of the Clancy-Unionville Final Supplemental Environmental Impact Statement (FSEIS) and the February 2003 Clancy-Unionville Record of Decision. The new information considered is based on new or recently compiled field surveys. The SIR consists of this summary and three detailed reports. Of the three reports, one report deals

with the new water quality information, one report concerns new old growth information, and one report concerns new wildlife information.

The following is a summary of those reports.

Water Quality

The Lake Helena TMDL has not been completed, however, much work has gone into the development of the TMDL. The Forest Service, in particular, has worked diligently to collect and provide to the EPA all data requested in a timely manner in order to complete the TMDL. In this regard, the Helena National Forest in November of 2003, completed and provided to EPA a pollutant source assessment for 303(d) listed water bodies within the administrative boundary of the Helena National Forest for the Lake Helena TMDL planning area. This pollution source assessment includes data on Lump Gulch, a drainage in the Clancy-Unionville project area. The pollution source survey conducted by the Helena National Forest did not include data on any other stream within the project area. However, Clancy Creek, a 303(d) listed stream is also within the Clancy-Unionville project area, but due to the vast majority of land being private, Land and Water Consulting, a contractor for the EPA, performed this survey work. The only activities taking place on Clancy Creek for the project are several grass burns, which are not projected to produce any sediment. Results of the survey for Clancy Creek can be found in the “2003 Preliminary Source Assessment for the Lake Helena TMDL Planning Area”.

An analysis titled “Clancy-Unionville Supplemental Information Report- Water Quality” (hereinafter Water Quality SIR) was completed to address this new information in relation to the existing Clancy-Unionville EIS and analysis.

The following summarizes the HNF’s consideration of the new information as reviewed in the Water Quality SIR. The Water Quality SIR is available for public review, along with the underlying data, as requested.

New Information Gathered As Part of TMDL Development

As discussed above, as a part of the ongoing effort to develop a TMDL the Helena National Forest has completed the pollutant source assessment for 303(d) listed water bodies within the administrative boundary of the Helena National for the Lake Helena TMDL planning area. This has been done in cooperation with Tetra Tech, Inc. and Land and Water Consulting who have been contracted by the EPA to develop and execute the Sampling and Analysis Plan for the Lake Helena TMDL Planning Area. A pollutant source assessment identifies the nature of the pollutants, where the pollution is coming from and calculates the relative contribution of all point, nonpoint and natural sources.

As part of the pollutant source assessment a sediment source survey was done as part of the TMDL development for the Lake Helena TMDL planning area. While the pollutant source survey identified other sources of pollution such as mine seepage and habitat alterations due to channelization caused by mining, sediment was the pollutant of concern as it is the only pollutant that the Clancy-Unionville project has the potential to affect.

The details of this sediment source survey can be found in the SIR. The sediment source survey included both office and comprehensive field examination of the Lump Gulch watershed (as well as other watersheds on the Helena National Forest outside of the Clancy-Unionville project area). This survey identified the location of each sediment source and either an estimated or calculated amount of sediment produced by the source. These sites are in addition to what was identified in the EIS or FSEIS. As noted in the SIR the only new measurable sediment source found on the Helena National Forest lands within the Clancy-Unionville project area was a portion of forest service road 1878 that crosses Lump Gulch. The calculated amount of sediment from this source is 2 tons per year. The sediment source survey also identified 23 additional sites contributing sediment to Lump Gulch on private land. Four of these were identified through our road sediment survey and nineteen were identified through our stream survey. The four additional road survey sites were quantifiable and are contributing a total of 0.9 tons per year. The other nineteen sites identified through our stream survey were not quantifiable, but were characterized as to their relative contribution, i.e., low, moderate or high. These nineteen sites contribute an estimated 5 tons of sediment per year. These 23 sediment sources are all on patented lands and were not surveyed in the original EIS or the Supplemental EIS.

Relationship of the New Information to the Clancy-Unionville EIS Analysis

A careful water quality/water quantity analysis was performed as a part of the Clancy-Unionville project and the project was modified and mitigation measures adopted to assure that the project will stay within water quantity thresholds and meet water quality standards (Record of Decision pgs. 15, 16, 27, 29, 33-34, and 53). This included, among other things, watershed improvement projects involving road obliteration, road stabilization, construction of erosion control features, culvert removal, installation of larger diameter culverts and revegetation of cut and fill slopes (ROD pg 15). Sediment delivery sites were located and depicted on the “Clancy-Unionville Project Sediment Delivery Sites” map in the FSEIS. One of the major rationales for the decision was to maintain or improve watershed conditions (ROD pgs 29, 33-34). The intent is to manage and maintain a system of roads and trails that satisfy the needs of forest resource users while still protecting other forest resources such as wildlife and water quality (ROD pgs 29, 33). In addition the decision dropped fourteen different cutting units totaling 494 acres to stay within water yield thresholds. The decision included watershed improvement projects for sediment delivery sites located on forest shown on the map in the FSEIS.

The Clancy-Unionville FSEIS identified a total of 37 sites contributing slightly over 47 tons of sediment within the project area (FSEIS pg 403). The original EIS calculated roughly 30 tons of sediment coming from various sources to Lump Gulch. Through the efforts of the sediment source survey an additional 24 sites have been identified in Lump Gulch one of which is on Forest Service land. These new sites contribute an estimated 8 tons of sediment that was not originally identified in the EIS or FSEIS. The FSEIS projected a reduction in sediment through various mitigation and rehabilitation efforts of roughly 15 tons for Lump Gulch for Alternative F (FSEIS pg 437). Mitigation applied to the one forest service site will further reduce sediment by approximately one ton. Actions

to reduce sediment from the road will be done in conjunction with the implementation of this project. The original analysis showed that sediment in Lump Gulch would be reduced as a part of this project and meet state water quality standards in terms of sediment (FSEIS pg 369). As a result of the SIR sediment calculations were redone. Percent fine sediment in spawning gravels change from 39.9 to 40.7 in year one and from 39.0 to 39.9 in year 6+ for Lump Gulch (FSEIS pg 413 Table 4b). This change is well within one standard deviation for percent fines in spawning gravels and does not constitute a significant change (FSEIS pg 402 Table 2a). Both the FSEIS and the SIR demonstrate a reduction in percent fines from the existing condition. While other sediment sources were identified as a part of the TMDL sediment source survey, they were on private land and beyond our control, albeit it is the intent of the decision to continue to work with Jefferson County to reconstruct the Lump Gulch road in order to increase safety and reduce sediment delivery (ROD pg 30).

The Final Supplemental Environmental Impact Statement (FSEIS) shows that the project will maintain and improve watershed conditions and water quality over the short and long term (FSEIS pg. 369). The FSEIS did indicate that water yield for Lump Gulch would exceed thresholds for cumulative effects, but this was addressed in the ROD by dropping 494 acres of harvest in Lump Gulch (ROD pg 16). The SIR analysis of the new information shows that the analysis and conclusions of the FSEIS are not substantially changed. The information presented in the SIR shows that percent fines in spawning gravels will go from an existing condition of 45.0 to 39.9 demonstrating a benefit to beneficial uses. While the TMDL for the Lake Helena planning area has not been completed all of the data for Helena National Forest Lands has been collected and analyzed. When the TMDL is completed we will again consider that new information in relation to the project.

Based on HNF's review of all of the information presented in the SIR and accompanying background data the HNF's ID Team has determined that the conclusions in the Final Supplemental Environmental Impact Statement are accurate and that the project will result in both short and long term sediment decreases for Lump Gulch.

Old Growth:

Recently, new information has come about that is relevant to environmental concerns that have been expressed related to the Clancy-Unionville Vegetation project. Two new reports concerning old growth on the Helena National Forest have been completed. The Northern Region Forest and Rangeland staff has completed this report using data from the Forest Inventory and Analysis (FIA) program for the landscapes on the Helena National Forest.

The Helena National Forest has also completed a third order drainage map identifying the 5% managed old growth across the Forest where timber management has occurred. This includes the third order drainage in Clancy-Unionville.

An analysis titled “Clancy-Unionville Supplemental Information Report – Old Growth” (hereinafter Old Growth SIR) was completed to address this new information in relation to the existing Clancy-Unionville EIS and analysis.

The following summarizes the HNF’s consideration of the new information as reviewed in the SIR. The SIR is available for public review, along with the underlying data, as requested.

New Information

An old growth analysis by Bush and Zeiler, May, 2004 (Attachment A to the Old Growth SIR), displays estimates of Forest-wide old growth per landscape as well as for the whole Forest. The landscapes were identified as Big Belts, Blackfoot, Divide, (Blackfoot and Divide combined represents the Continental Divide), and Elkhorns with a 90% confidence interval. The analysis included all 139 FIA plots that are considered forested on the forest. This analysis showed that the estimated percent of old growth on all forested lands on the Helena National Forest had a mean of 8.64% with a 90% confidence interval, with a lower bound of 5.90% to an upper bound of 11.51%.

Subsequent to the Clancy-Unionville decision, the Helena NF produced a map identifying the 5% managed old growth across the Forest. The map (Attachment D) shows each third order drainage on the Forest that have managed old growth. In each of those drainages the Forest has identified 5% managed old growth, which complies with the Forest Plan standard.

There are a total of 119 third order drainages on the Helena National Forest, comprising 558,885 acres. Fifty-five of these drainages, have had some timber management activity since the adoption of the Forest Plan in 1986.

Relationship of the New Information to the Clancy-Unionville EIS Analysis

Based on HNF’s review of all of the information presented in the Old Growth SIR and accompanying project file, the ID Team has determined that the conclusions in the Final Supplemental Environmental Impact Statement are accurate and that the project will not have adverse impacts on old growth on the Helena National Forest. The information in the Old Growth SIR supports the conclusions in the vegetation report for the Clancy-Unionville project.

Wildlife:

New wildlife information related to amount of habitat available for certain management indicator species (MIS) on the HNF has become available. Specifically, the new FIA data has allowed the Helena National Forest to undertake an analysis, using FIA, of the forest-wide habitat of the northern goshawk, pileated woodpecker, hairy woodpecker and the American marten. The HNF also completed an update of the results of the habitat model analysis based on the use of TSMRS data which was previously referenced in the

Clancy-Unionville FSEIS. This information was updated as the wildfires of 2003 changed the baseline habitat upon which the habitat model analysis was conducted. In addition, there has been reported additional population data and trend information for certain species; including the data published in the Helena National Forest, Annual Monitoring Report, Fiscal Years 2002/03, June 2004.

An analysis titled “Clancy-Unionville Supplemental Information Report - Wildlife” (hereinafter Wildlife SIR) was completed to address this new information in relation to the existing Clancy-Unionville EIS and analysis.

The following summarizes the HNF’s consideration of the new information as reviewed in the SIR. The SIR is available for public review, along with the underlying data, as requested.

New Information

Habitat analyses for pileated woodpeckers, northern goshawks, hairy woodpeckers, and American marten to assess abundance and distribution have been conducted using two different datasets:

- FIA (Forest Inventory and Analysis) data
- Timber Stand Management Reporting System (TSMRS) data

Habitat models and results of the regional FIA analysis for pileated woodpeckers, goshawks, hairy woodpeckers, and marten are described in Appendices A, B, C, and D of the Wildlife SIR.

The HNF also completed an update of the results of the habitat model analysis based on the use of TSMRS data which was previously referenced in the Clancy-Unionville FSEIS. Habitat had been modeled for the goshawk, pileated and hairy woodpeckers, and the American marten in 2002. Since that time, wildfires, winter killed trees, harvest activity have resulted in a changed baseline. To reflect these changes, the models that were used for the initial analyses have been rerun to reflect the most recent landscape conditions. Table 2 of the Wildlife SIR reflects the summary of habitat, forest-wide based on updated TSMRS analysis

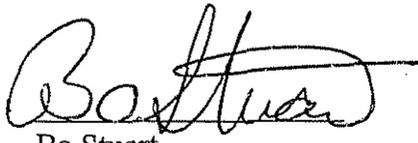
Relationship of the New Information to the Clancy-Unionville EIS Analysis

Based on HNF’s review of the new information presented in the Wildlife SIR and the Old Growth SIR and information contained in the project file, the ID Team has determined that the conclusions presented in the Clancy Unionville Final Supplemental Environmental Impact Statement are accurate and that the project results in minimal effects to MIS habitat and “sufficient habitat would remain throughout...the Helena National Forest to support viable populations of all management indicator species” (Chapter Three, page 179, FSEIS).

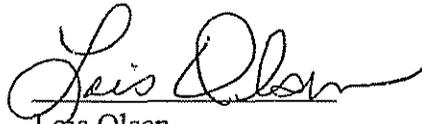
Conclusion:

The HNF's review of the above information shows that the effects as depicted in the Clancy-Unionville Project FSEIS and Record of Decision are still valid and that additional environmental analysis in the form of a supplement to the FSEIS is not required. The ID Team does not recommend that a supplement to the FSEIS is needed or required.

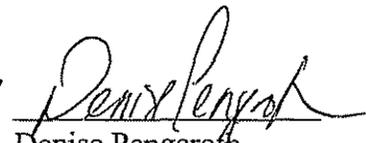
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