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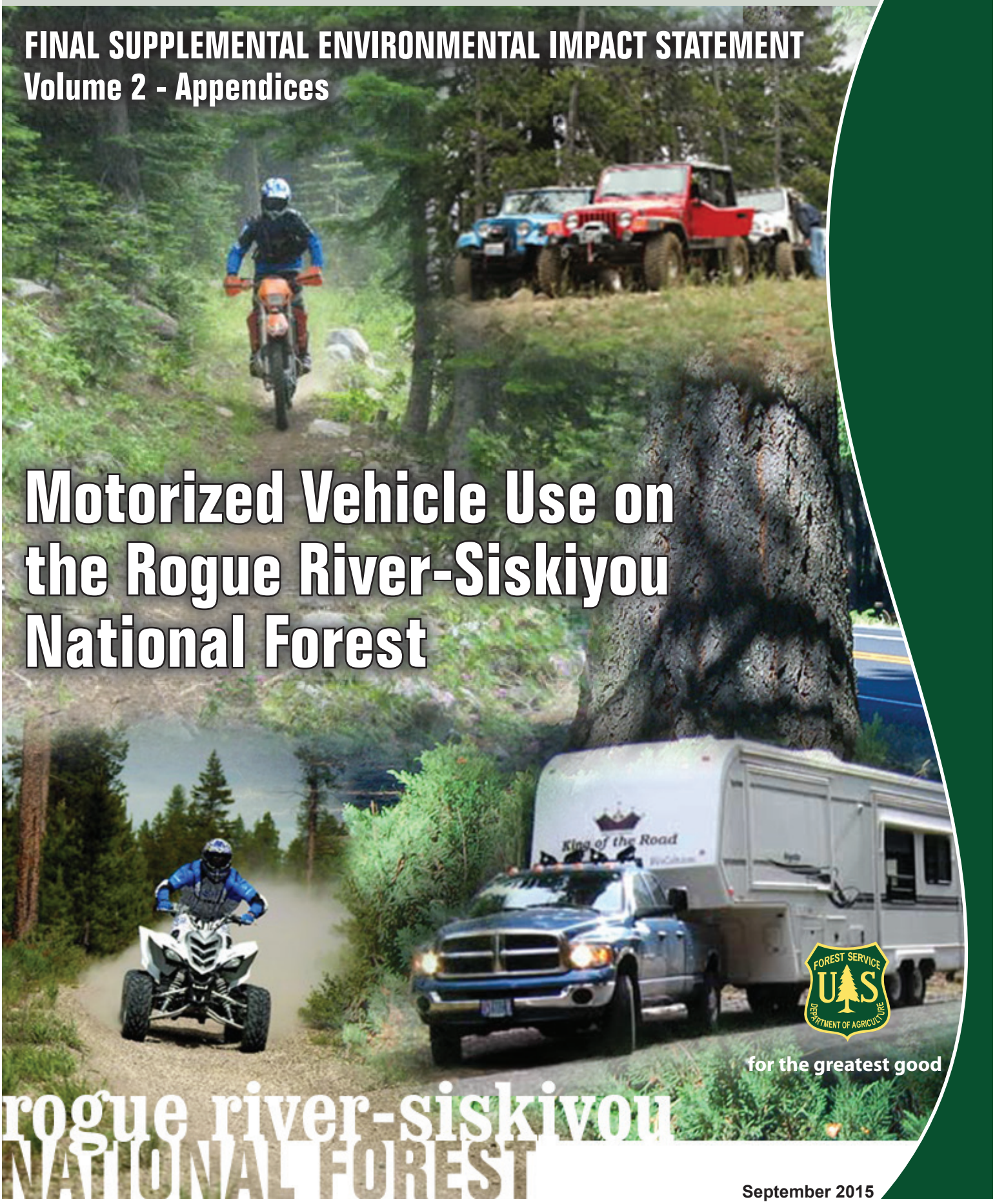

Motorized Vehicle Use on the Rogue River-Siskiyou National Forest

for the greatest good

rogue river-siskiyou NATIONAL FOREST

September 2015

Vicinity Map

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Summary of Comments and Responses to Comments Received on the September 2011 Draft Supplemental EIS

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Appendix A to Final Supplemental Environmental Impact Statement Motorized Vehicle Use on the Rogue River-Siskiyou National Forest

Responses to Comments Received on the September 2011 Draft Supplemental EIS

A Draft Supplemental EIS (DSEIS) was made available for public review and comment under the provisions of the National Environmental Policy Act (40 CFR 1506.10), and Notice, Comment, and Appeal Procedures for National Forest System Projects and Activities, (36 CFR 215). The Forest Service accepted written, electronic and oral comments as provided in §215.6. Pursuant to 36 CFR 215.6 (b), (1), this appendix documents the Responsible Official's consideration of all substantive comments submitted in compliance with paragraph (a) of this section.

PUBLIC INVOLVEMENT

A Final Environmental Impact Statement (FEIS) for Motorized Vehicle Use on the Rogue River-Siskiyou National Forest (RRSNF) was dated November, 2009. That FEIS included a Response to Comments (Appendix A) addressing substantive comment received on the March 2009 Draft EIS. A Record of Decision (ROD) based on that FEIS was signed on December 3, 2009. Shortly thereafter, issues were raised through the appeal process that ultimately resulted in the withdrawal of the December decision and the beginning of a Draft Supplemental Environmental Impact Statement (**DSEIS**) process, designed to address issues raised during the appeal process requiring additional analysis, clarification, or modification.

For the Draft Supplemental EIS there was no "Scoping". Under 40 CFR 1502.9(c)(4), there was no formal Scoping period for this action. Appropriate procedures under NEPA required a Notice of Intent (NOI) to prepare a Supplemental EIS; the Notice of Intent to prepare an Environmental Impact Statement was published in the Federal Register on August 2, 2010 (FR page 45089-45090).

A 45-day DSEIS public comment period for Motorized Vehicle Use on the Rogue River-Siskiyou National Forest formally began on October 7, 2011, the first day following publication of a Notice of Availability in the Federal Register Vol. 76, No. 195 (FR page 62406). The 45-day comment period began on October 8, 2011 and closed on November 21, 2011.

Eighty-one paper copies and 63 compact discs of the full DSEIS were produced along with 20 paper copies of the DSEIS and a CD. Two hundred thirty-one letters were mailed to notify participants of the availability of the DSEIS. Copies of the full DEIS were distributed to federal and state agencies, local governments, elected officials, seven Federally recognized tribes, media representatives, libraries, organizations, and businesses (see DSEIS, Chapter VII, for a listing). The full DEIS was provided to others upon request. The document was also made available on the Rogue River National Forest website at http://www.fs.fed.us/r6/rogue/.

SUMMARY OF PUBLIC RESPONSE

A total of 453 comments (various forms of input; see below) to the DSEIS were received by the Forest at the close of the comment period. All comments received within a few days of the close of the comment period were also reviewed and were considered as part of the comment analysis process. All comments were read and coded based on content and intent, by a Forest Service planning team, with Forest oversight, review and concurrence.

The following statistics are provided for information only to show the basis and diversity of public response and comment to the DSEIS.

Form of Response

The Forest Service tracked the various types of comments by form of response communication. Approximately 91% of the comments were received via the electronic email site established by the Forest Service to receive comments on the DSEIS (comments-pacificnorthwest-rogueriver-siskiyou@fs.fed.us).

Approximately 405 (89%) of these comments were generated via an electronic site established to facilitate an electronic response (that contained a pre-determined viewpoint). Five or more responses received from different individuals but containing identical text, or identical text plus brief additional comments similar in content, were considered an organized response campaign.

Type and Geographic Location of Respondent

The Forest Service tracked the various types of comments by type of respondent. The following table shows the type or respondent tracked and the number of comments received by each type. **As required by Forest Service policy, copies of the actual letters received by governmental agencies are contained at the end of this Appendix.**

432	Individual/family
3	Federal Agency
2	County Government
12	Environmental Organization
4	Interest Group
453	**Total**

The geographic location of those providing comment was tracked for informational purposes only and merely offers a sensing of the location of those who chose to comment on the DSEIS. The most respondents were from Oregon, primarily southwest Oregon. Other respondents were from California, Maryland, Montana, New Mexico, and Washington. A majority of comments sent by email did not identify the respondent's geographic location.

Summary of Comments

Substantive comments received on the 2011 DSEIS generally focused on the transparency of analysis, and the detail and basis of assumptions of analysis. There were some comments that provided new information or sources of new information, or expanded on existing issues. A number of comments offered suggestions or ideas for specific actions, i.e., locations of road or trails that should or should not be part of the alternatives (or the final decision). Several comments suggested methodologies for implementation, mitigation, or enforcement.

The majority of comments received were not considered substantive, as they primarily offered opinions or rationale for their viewpoint. These viewpoints tended to focus on support for motorized vehicle use or opposition to motorized vehicle use. Many of these non-substantive comments were sincerely written and offered some detail in support of their opinion, (i.e., for or against motorized vehicle use).

As in 2009, comments asked for identification of the minimum road system for safe and efficient travel. As stated throughout this process, identification or "rightsizing" of the entire road system is neither a goal nor part of the analysis conducted for designation of motorized vehicle use on the RRSNF. The purpose of the Travel Management Rule is to designate a system of roads, trails, and areas for motor vehicle use (other than over-snow vehicle use) and end unmanaged cross-country motor vehicle use.

This project is not evaluating the entire Forest Transportation System, nor is it making recommendations for road closing or decommissioning. This process is about designating where motorized vehicle use would be allowed; it is not a proposal to physically close (or decommission) any roads or trails. The DSEIS did not intent to imply that the requirements at 36 CFR 212 Subpart A (§212.5) would not be met by the Forest; they would however not be attained with *this process* for motorized vehicle use designation. In addition, site-specific (project by project) Roads Analysis has and will continue to be accomplished in compliance with 36 CFR 212 Subpart A (§212.5).

Many comments further provided information regarding illegal motorized use and/or resource damage apparently caused by illegal use (some very specific with photographs). While the Forest continues to appreciate this information, existing resource damage caused by illegal motorized use as associated with the current condition is predominately not within the scope of this process. Many of these examples will trigger the need for additional enforcement actions, additional facilities to be installed or repaired, or restoration of resource conditions. However, these actions are not being proposed under this process; they are ongoing management or maintenance.

Further, this process cannot analyze or predict illegal activities. A certain amount of illegal activities are likely to continue under any scenario for motorized use, however, the goal of this process is to enact a system that would help to curtail illegal use, and provide a mechanism to allow enforcement citations for any illegal use.

Finally, comments regarding consequence analysis often asked for consideration of the effects from the ongoing current condition use of roads and trails. Consideration of the consequences of current uses was a part of the Travel Analysis step of this process (originally compiled in 2008 with updates throughout this process). Many of these conditions provided the basis for changes proposed as part of the alternatives considered in detail in the 2009 DEIS and FEIS, and throughout this process. As stated in the DSEIS, this step of the process and its analysis under NEPA has focused on the change from the current situation. A tightly focused process was enacted; this includes focused site-specific proposals that do not aim to solve all travel management issues at once.

RESPONSE TO COMMENTS

Coding of each comment was based on the plain meaning and content of the sentence or paragraph as understood by Forest Service analysts. The original comment letters, as well as letter copies displaying the analyst's coding, are included in the Project Record.

Rules for Content Analysis

As each letter was read, all comments were sorted into one of two primary types – either substantive or non-substantive. As overarching guidance, s**ubstantive comments** are defined as: "[c]omments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider [36 CFR §215.2 Definitions]." Statements or observations not meeting the above definition are considered **non-substantive comments.** Each statement, question, proposition or assertion was assigned a code, as defined in **2012 DSEIS Comment Codes**.

Comments identified as substantive were sequentially coded within the letter during the review to track the respondent and the category of response. Substantive information contained in the letters was extracted using the standards for timeliness and consideration furnished in the notice and comment regulations promulgated at 36 CFR §215.6 (a) and (b).

A list of DSEIS respondents providing substantive input is contained at the end of this appendix (e.g., DS-0##; DS referring to Draft Supplemental EIS).

A ***substantive comment*** (which was underlined in the input and received an associated number code) is a response that:

> **Identifies a new, not previously described issue or expands upon an existing issue in a new or important way;**
>
> **Provides information, pertaining to existing environmental conditions, design of the proposed action, design of an alternative or the consequences presented in the environmental document, which reveals an inconsistency or omission in the analysis;**
>
> **Identifies or recommends a specific method, procedure, system, manipulation, allowance or constraint to modify or add to potential variation in, or a differing approach to, the proposed action (or another evaluated alternative) that portrays an opportunity to change the magnitude, duration or significance of disclosed environmental consequences;**
>
> **Offers a practical and completely new alternative (not heretofore considered) that is pertinent to the underlying need for the proposal and also may be instructive to a more complete environmental analysis;**
>
> **Poses a question or explicitly/implicitly identifies information that could improve understanding of the design of the proposal, the affected environment or anticipated impacts; or**
>
> **Offers a science study/citation that was not included in the Forest Service analysis or that suggests another perspective (i.e., that provides a differing or opposing viewpoint) to support a contention that environmental impacts described are incomplete, incorrect or do not adequately reflect scientific uncertainty or disagreement.**

Non-substantive comments (which received an associated number code [001 through 006]) are defined as statements that:

> **Express values, opinions, beliefs or assertions, and/or convey support, agreement or a preference (vote) for a particular action, alternative or outcome, that declares the respondent's perspective but does not dispute the results of the environmental review or explain the relevance of the statement to the proposed project design and acknowledged impacts** [Note: While expressions of viewpoint are legitimate feedback for the Forest Service to consider, and it is important to understand varied perspectives, an agency response is not ordinarily warranted for these types of statements];
>
> **Recite existing laws, regulations, management direction, policy, resource management knowledge, science literature conclusions/citations, definitions, management practices or policies (or provide a personal interpretation of such) or restate analysis or information already documented in the environmental document;**
>
> **Provide commentary that is outside the scope of the proposal at hand (for example, implementation of the requested action would not comply with current law/policy or the relevance of a statement is not made clear with regard to the proposal, the suggested adjustment is outside of the Responsible Official's decision space or the commentary is not related to the proposal or its purpose and need under consideration);**

Lacks site specificity to identify an effects analysis deficiency, lack clarity to understand the meaning of the respondent's statement in connection with the proposal at hand, or the comment is composed of expansive or vague assertions unsupported by data, logical line of reasoning, observation, evidence or specific relationship to the proposal under consideration;

Make reference to or are based on the position or comments of others (out of scope), or

Offer comments on availability of NEPA documents, internet, notice for public meetings, adequacy of process, etc.

Comment Tracking – Rules and Assumptions for 2011 DSEIS

As noted above, this Response to Comments document is prepared in response to the 2011 DSEIS. It therefore is the second Response to Comments document that has been prepared for the Travel Management Process; the previous one having been prepared in 2009 for the Draft EIS. Both response documents are referenced as Appendix A to their respective Final EISs.

Given the history of this process, now spanning several years, there has been a substantial volume of public input to this process. Input has included Scoping in 2008, formal comments to the DEIS in 2009, appeals to the Record of Decision made in 2009, input received outside of any input or NEPA process, and now, the formal input received during the comment period to the September 2011 DSEIS.

In order to facilitate meaningful, timely and appropriate input, the coding and responses in this appendix have focused on specific input received in regard to the 2011 DSEIS and its comment period. Many respondents provided copies of their previous input, or the previous input of others, outside of the current comment period. The Forest has elected to not respond directly to this type of previous input, unless a specific and substantive tie is made to the September 2011 DSEIS. Most of this type of input has been previously responded to.

In accordance with the NEPA process and agency policy, it should be noted that the 2009 DEIS was completely replaced with the 2009 FEIS. While a Record of Decision was prepared in 2009, upon appeal, it was withdrawn and therefore does not actually exist. The 2011 DSEIS was designed to address issues raised during the appeal process requiring additional analysis, clarification, or modification. Therefore it should be expected that the 2011 DSEIS contains new, updated or changed information from the previous versions of the EIS. It should also be expected that the forthcoming Final Supplemental EIS (FSEIS) will contain new, updated or changed information from the 2011 DSEIS. This is noteworthy to understand why the Forest did not directly respond to claims that the latest information is different than in previous version. The focus of the comment analysis and this Response to Comments document is on comments that relate directly to the 2011 DSEIS.

The following section contains substantive comment statements and Forest Service responses. After analyzing the comment statements as described below, the Planning Team with assistance from the Interdisciplinary Team grouped the related topics to avoid duplication and responded to the comments. The comments and responses are intended to be explanatory in nature; if there are any inadvertent contradictions between this Appendix and the text of the forthcoming FSEIS, the FSEIS prevails.

Each substantive comment is captured in **bold** below, followed by the agency's response to each. To minimize duplication, substantive comments addressing essentially the same topic or concern have been consolidated among the various letters. Each comment contains an example citation and/or reference to the comment letters where contained. Every comment was read, reviewed and considered, regardless of whether it was one comment repeated many times by many people, or a comment submitted by only one person. Emphasis was placed on the content of the comment.

Substantive Comments - DSEIS Corrections/Clarifications: Text

<u>Comment #1:</u> Clarify "Limited FS Administrative" Use (Page II-16) (053)

If the people that own the forest (the taxpayers) are made to walk, so should Forest Service employees; does Forest Service motorized use cause damage? (DS-005, page 1)

Response:
Limited Forest Service Administrative Use is related to the administration of activities suggested on DSEIS page II-16:

> "Access for permitted activities (such as livestock operations, maintenance of water developments, utility maintenance, timber management or harvest activities, ski area management, outfitter-and-guide operations, forest product gathering, and special events) on National Forest System land is independent of general public access. Individuals or groups with special permits are allowed to conduct their business according to conditions outlined in their permits. If a permit does not stipulate exemptions to the Forest's travel regulations, the general travel regulations will apply."

The 2005 Travel Rule itself exempted "administrative use" along with other exemptions from the general motorized prohibitions of the rule. (36 CFR § 212.51(a)(4)) Therefore, the Rogue River-Siskiyou NF is merely implementing this provision, which has already been promulgated and not open for challenge through this decision-making process. The opportunity to challenge "administrative" exception to the general prohibitions would have been during the informal rulemaking process pursuant the Administrative Procedure Act, as amended, 5 U.S.C. §§ 551 et seq.

Although this use would be exempt from the 2005 Travel Rule, these administrative activities would typically be: 1) very minor in amount and duration; 2) would not typically involve motorized use unless determined reasonably necessary; 3) would not occur in Wilderness and other congressionally designated special area without additional approval; and 4) would incorporate appropriate mitigation measures to minimize adverse environmental impacts. This will be clarified in the FSEIS.

<u>Comment #2:</u> Clarify seasonal use restrictions for Big Game Winter Range (Mule Mountain) (054)

ODFW recommended restrictions to motorized use within designated Big Game Winter Range (RR Land Management allocation MA-14) from November 1-May 1 in the Mule Mountain area. Page A-45 of the 2009 FEIS the Forest Service contends that such a seasonal restriction is "already an option." Yet that FEIS and the current DSEIS fail to disclose if and when that "option" will be implemented. (DS-007, page 9; DS-016, page 32)

Response:
Implementing seasonal restrictions for motorized use (vehicle access) within Big Game Winter Range (Rogue River Land Management allocation MA-14) is already an option, as stated in Forest Plan Standards and Guidelines for recreation at LRMP page 4-165:

> 6. Control vehicle access in big game winter range as needed between November 1 and April 30 to prevent biological stress.

This use restriction has been implemented by the Responsible Official (District Ranger) numerous times in the past, regardless of this motorized vehicle use process. If necessary, based on the professional judgment of a district wildlife biologist in consultation with ODFW, Big Game Winter Range restrictions would be carried forward and published on the Motor Vehicle Use Map.

Therefore, recommended restrictions of ODFW are incorporated into the Travel Management process and would be implemented with this decision. (Travel Management DSEIS at III-133; Appendix B at B-3) As described in the Travel Management DSEIS, all previous forest orders and seasonal road closures would be incorporated in the proposed Motor Vehicle Use Map. (DSEIS at III-2; Appendix B)

<u>Comment #3:</u> Clarify proposals to allow motorized use in IRAs (055)

According to the TMR page 68264 "non-motorized travel and experiences" are to be preserved while implementing the TMP. Yet, the agency has proposed allowing motorized use within the majority of inventoried roadless areas in the RR-SNF. In fact, the majority of proposed motorized trails are located within IRAs. While the Rule doesn't prohibit motorized use per se, it does prohibit road construction and reconstruction, the latter which can be defined as roads that are being put to a use for which they were never intended or designed. (DS-007, page 14; DS-036, page 7)

Response:
The quoted statement above mischaracterizes the summary contained in the Federal Register notice for final rulemaking titled: *Travel Management; Designated Routes and Areas for Motorized Use*. On page 68264 of the above-mentioned notice, the department summarized the purposes of the rule, which includes "enhance opportunities for motorized recreation experiences on National Forest System lands . . . and preserve areas of opportunity for nonmotorized travel and experiences." Further clarification is provided on page 68266 that states, "National Forests are managed by law for multiple use . . . [t]hese uses must be balanced, rather than one given preference over another. (70 Fed. Reg. 68264 (2005)) The Rogue River-Siskiyou NF provided an analysis of impacts to IRAs and non-motorized recreation opportunities. In fact, three alternatives propose a reduction in motorized use in these areas to the benefit of non-motorized users.

Thus, the DSEIS considered Travel Management Rule guidance and direction along with the effects to IRAs and compatibility of uses (DSEIS III-50 thru 55). The summary table on page III-55 identified the change of allowable motorized use within IRAs:

Table III-2. Summary of Motorized Use in IRAs by Alternative

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Acres of cross-country travel	30,170	0	0	0	0
Miles of open roads	48	48	34	0	34
Miles of motorized trails	94	94	72	0	64

Alternatives 3, 4 and 5 clearly show a prohibition of acres of currently allowable cross-country travel and reductions in the miles of open roads and trails within IRAs. In particular, Alternative 5 (the Preferred Alternative) reduces the amount of open roads on IRAs by 14 miles and a reduction of the amount of open motorized trails by 30 miles. Therefore, Action Alternatives 3, 4, and 5 not only propose to preserve existing non-motorized uses; in fact, they enhance those opportunities by reducing areas, roads, and trails currently open to motorized uses in IRAs.

In addition, all the proposed alternatives comply with the 2001 Roadless Area Conservation Rule. This is because continued use of existing roads and trails within IRAs is not road construction or reconstruction as defined by the 2001 Roadless Rule. (36 CFR § 294.12) Further, the proposed designation of existing roadways for motorized public use is not new and has occurred for many decades prior to promulgation of the 2001 Roadless Rule. Therefore, the roads being considered for continued authorization as open to motorized vehicles by the general public are not in violation of the 2001 Roadless Rule.

<u>Comment #4:</u> Clarify purpose and need regarding route specific plan amendments and conflicting plan direction (056)

In the DSEIS the agency state that "In order to meet these objectives the following changes are needed…Amend the Rogue River and Siskiyou National Forest Plans…to provide consistent direction for conflicting plan allocations that will allow historical use of travel routes." It also adds that the purpose and need includes to "make minor, limited changes to the National Forest Transportation System to preserve a diversity of unique motorized recreation opportunities." Inclusion of these statements in the purpose and need creates a predetermined outcome (plan amendments and only "minor" changes). (DS-007, page 44)

Response:
The *Purpose and Need* for action was clarified in the DSEIS to specifically note the *Purpose* of this action is to implement Subpart B or the Travel Management Rule, and to identify that specific changes are *Needed* (DSEIS I-7). It is within the agency's discretion to clarify and/or modify the wording of its purpose and need for a proposed action. The clarification included in the DSEIS did not change the substance of the project's goals. Instead, the additional clarification was intended to assist the reader in understanding the initial goals and objectives to simply enact Subpart B of the 2005 Travel Rule. As seen from comments to the original Final EIS, published November 2009, certain members of the public mistakenly believed that the project's purpose was to re-consider all transportation routes across the Rogue River-Siskiyou NF. However, the intent was to the contrary, it was and still is, the publishing of a motor vehicle use map, displaying the routes, trails and areas open to motorized use. The Rogue River-Siskiyou NF decided, after pre-scoping meetings and internal dialogue, that initiating a new inventory of all roads, trails, and areas, without regard to prior travel management decisions and travel plans incorporated into the Land and Resource Management Plans would be unproductive, inefficient, and counter to the purposes of the final 2005 Travel Rule, as well as disrespectful of public involvement in the past. This perspective is equally echoed by the final 2005 Travel Rule and forms the basis of the continued *Purpose and Need* of this project. (70 Fed. Reg. 68268 (2005))

Regarding plan amendments, the Travel Management process for the Forest has consistently identified that the *need* for Forest Plan amendments, is primarily to close areas currently open to cross-country travel. The 2005 Travel Rule required National Forest System units to identify discrete areas (smaller than entire Districts) to designate for use by motorized vehicles. In addition, other land management plan amendments are *needed* in order to consider making historical and ongoing motorized use legal and in accordance with Forest Plan direction that is currently in error and/or inconsistent between the two affected Forest Plans. The 2005 Travel Rule contemplated that some plan amendments would be necessary to implement the final rule. In fact, sections of final rule as published in the Federal Register titled: *Travel Management; Designated Routes and Areas for Motorized Use, Public Comments and Department Responses* included discussions on the ***need*** during implementation for National Forest System Unit plan amendments to create consistency between proposed designations and current plan inconsistencies. Therefore, the Rogue River-Siskiyou NF Travel Plan's *Purpose and Need* is precisely the type contemplated by departmental-level direction concerning implementation of the 2005 Travel Rule. (70 Fed. Reg. 68268, 68274, 68279, (2005))

<u>Comment #5:</u> Clarify Mule Mountain and McGrew trail grants; connectivity to the TMP process (057)

The document did not analyze Mule Mountain Trail Grant and McGrew Trail Grant as connected actions and the agency was actively engaged in developing OHV trails and trailheads while analyzing if these trails should allow OHV use in the future, these are clear violations of NEPA and are clearly "connected actions". (DS-007, page 50)

Response:

The CEQ regulations define a "connected action" as actions that automatically trigger other actions; actions that cannot proceed unless other actions are taken previously or simultaneously; or are interdependent part of a larger action. 40 CFR 1508.25(a)(1). The grant money was received to maintain the existing Mule Mountain Trail which currently allows motorized use. This work was independent of the decision to allow (or not allow) motorized use on this trail. It was requested to ensure resource protection and not for the purposes of developing new motorized uses. Therefore, grant funding is not connected to a decision for motor vehicle use because routine maintenance will occur regardless and independent of the uses allowed in the future. (DSEIS at III-4)

<u>Comment #6:</u> Clarification; Decision Framework (058)

Clarification is needed to the sentence on DSEIS page I-9 stating: "No decision will be made for State and County roads and other roads not under the jurisdiction of the Forest Service. It should state: "No decision will be made for State and County roads and other roads *OR ROAD SEGMENTS* not under the jurisdiction of the Forest Service." (DS-013, page 2)

Response:
As stated in the 2005 Travel Rule, motor vehicle use on State, county, municipal or private rights-of-way are not subject to the designations made under the final rule. 36 CFR § 212.55(d) specifically recognizes valid existing rights of easement holders or other legal documents that exempt certain users from the provisions of the final rule.

Therefore, the suggested wording, "or road segments" will add to the sentence and will be carried forward to the FSEIS to provide additional clarification regarding the application of the 2005 Travel Rule.

<u>Comment #7:</u> Clarification: mining includes prospecting and exploration; Travel Rule (059)

The Travel Rule at 70 FR 68284 (11/9/05) indicates that "written authorization" for activities such "mining" may be "exempted from designations and the prohibition regarding motor vehicle use." Please note that the Rule mentions "mining," not "prospecting" or "exploration." Hence the contention that recreational ORV users are exempt from road closures and the cross-country travel prohibition and need not provide notification to or seek authorization from the Forest Service prior to alleged motorized travel for "exploration" or "sampling" activities is in error. (DS-016, page 11)

Response:
Mining operations are defined by Forest Service regulations as "all functions, work, and activities in connection with prospecting, exploration, development, mining or processing of mineral resources and all uses reasonably incident thereto, including roads and other means of access on lands subject to the regulations . . . ." (36 CFR § 228.3(a)) Therefore, prospecting and exploration are defined by Forest Service regulations as "mining operations" for the purposes of the 2005 Travel Rule. The DSEIS describes when and where an operator mining pursuant to the Mining Law of 1872 can operate without a written authorization, or in the alternative, will need to comply with the Plan of Operations provisions at 36 CFR § 228.4 where activities will cause significant surface disturbance. (DSEIS at III-175 to III-179)

Thus, prospecting or exploration will be analyzed on a case-by-case basis as mining Notices of Intent are received, and the District Ranger will screen the mining proposals to determine the appropriate level of approval for requested access across routes closed to the general public or cross-country travel.

<u>Comment #8:</u> Clarification: why has LRMP 4-24 been changed via a proposed amendment? (060)

In addition to the Route-Specific Plan Amendments, at B-18 the DSEIS also calls for altering the Standards and Guidelines contained in the Rogue River NF LRMP at 4-24 in order to codify and encourage off-road motorized recreation in Backcountry Non-Motorized Areas. Interestingly, this proposed amendment does not modify the prohibition on ORV use within Research Natural Areas. (DS-016, page 12)

Response:
Based on public comment to the 2009 DEIS, in the 2009 FEIS and 2011 DSEIS, the language at RRNF LRMP page 4-24 was proposed for an amendment to clarify Forest Management Direction for RECREATION, LRMP page 4-24 regarding Backcountry Non-motorized Areas (MS-3).

Upon closer review, it is noted that the Boundary Trail also goes through a portion of the Oliver Mathews Research Natural Area (MS-25). A specific proposal to change the Standards and Guidelines for RNA at 4-292 (Appendix B, page B-20) regarding the Boundary Trail was previously included. Since management direction at page 4-24 is inconsistent for RNAs, a revised proposed Plan Amendment will be included in the FSEIS to remedy this inconsistency (for Management Direction at LRMP page 4-24).

Also note that the proposed plan amendments are not designed to encourage off-road motorized recreation in Backcountry Non-motorized areas. In a response to the 2005 Travel Management Rule, the agency noted (70 Fed. Reg., #216, p. 28271):

> *"Response.* This final rule does not encourage or discourage motor vehicle use, but rather requires designation of roads, trails, and areas for motor vehicle use. The Department believes that a well-designed system of routes and areas designated for motor vehicle use can reduce maintenance needs and environmental damage, while enhancing the recreational experience for all users, both motorized and nonmotorized."

<u>Comment #9:</u> Clarification: proposed plan amendments and changes to management direction and Standards and Guidelines (061: FS observation)

Response:
As noted above (Response to Comment #8), there is a need to include plan amendment changes to Management Direction at RRNF LRMP page 4-24, regarding Research Natural Areas. In addition, clarifications are needed on proposed Forest Plan Amendments Standards and Guidelines; these will be identified in Chapter II and Appendix B of the forthcoming FSEIS. These clarifications will include further changes to the wording of proposed amendments and FSEIS Appendix B will include maps that identify site-specific routes and the associated Land Allocations needing specific Forest Plan Amendments.

<u>Comment #10:</u> Clarification: definition of trail widths (II-3) 50 inches on class III motorized trails and 72 inches clearing wide on Class I motorized trails (062)

The DSEIS presents a circular definition at II-3 by contending that "roads are motorized vehicle routes 50" inches or greater in width, unless defined and managed as a trail" [and] "trails are less than 50" inches in width, or when greater than 50" inches in width, defined and managed as a trail." (DS-016, page 18)

Response:
The statement found in the DSEIS on page II-3, is regarding the definition of roads and trails:

> **"Roads** are motor vehicle routes 50 inches or greater in width, unless defined and managed as a trail. Roads are managed by Forest Service Engineering groups. **Trails** are less than 50 inches in width, or when greater than 50 inches in width, defined and managed as a trail. Trails are managed by Forest Service Recreation managers. An old railroad grade converted to a trail would be an example of a trail wider than 50 inches."

The definition used by the Forest Service regarding road and trail width is promulgated in Forest Service regulation 36 CFR § 212.1, as well as in Forest Service Manual (FSM) 2350. In particular, FSM and regulation states the following: "*Trail.* A route 50 inches or less in width or a route over 50 inches wide that is identified and managed as a trail." This definition applies to Subpart A, *Administration of the Forest Transportation System*, Subpart B, *Designation of Roads, Trails and Areas for Motor Vehicle Use*, and Subpart C, *Use by Over-Snow Vehicles*. The 2001 Roadless Area Conservation Rule (36 CFR § 294.11) also used this definition to define road and trail widths and management restrictions within Inventoried Roadless Areas.

The definitions for roads and trails give the agency the flexibility to identify and manage as a trail routes that are wider than 50 inches. Some trails on NFS lands are wider than 50 inches and may have physical characteristics of a road. Some trails are open to full-sized vehicles. Four-wheel-drive travel ways and trails originally constructed as roads or railroad grades are all part of the Forest Service trail system. The current definitions for a road and trail, which embrace the diverse array of trail opportunities, are retained in the final 2005 Travel Rule. (70 Fed. Reg. 68288 (2005))

Thus, the DSEIS is not arbitrary in defining the definitions of road or trail width and management. The opportunity to challenge this definition would have been during promulgation of the 2005 Travel Rule because the Rogue River-Siskiyou Travel Management EIS process is merely utilizing definitions previously decided through notice and comment informal rule making pursuant to § 553 of the Administrative Procedure Act.

<u>Comment #11:</u> Clarification in IRAs: trails are defined as less than 50" in width (063)

Please note that the roadless Rule defines trails as being less than 50: in width (DS-016, page 19)

Response:
Refer to Response to Comment #10, which correctly states the **entire** definition included in the 2001 Roadless Rule: "Road. A motor vehicle travelway over 50 inches wide, unless designated and managed as a trail."

As discussed in the Roadless Rule comment responses, "A trail is established for travel by foot, stock, or *trail vehicle* and can be over or under 50 inches wide. (emphasis added) Nothing in the [rule] as proposed was intended to prohibit the authorized construction, reconstruction, or maintenance of motorized or non-motorized trails that are classified and managed as trails pursuant to existing statutory and regulatory authority and agency direction [contained in] FSM 2350. (66 Fed. Reg.3251, 3272 (2001))

Thus, the 2001 Roadless Rule does not prohibit motorized trails within IRAs. Nor does it prohibit National Forest Transportation System roads in existence prior to January 12, 2001. (36 CFR § 294.14) The concern here is that motorized trails are roads, or that they may have once been roads (Maintenance Level 1) and that as motorized trails, they may continue to grow in width. The Roadless Rule (36 CFR Part 294) clearly defines a road as a "motor vehicle travelway over 50 inches, unless designated and managed as a trail"; therefore, the proposed routes within the DSEIS are in conformance with agency policy, including the 2001 Roadless Rule.

<u>Comment #12:</u> Clarification: signage is necessary for open roads not authorized for use (064)

Several substantive site-specific comments were provided [*for example*] regarding the high risk that motorized use of 1/3rd of a mile of the Chetco Pass Road (4103087) that extends into the Chetco watershed (to the boundary of the Kalmiopsis Wilderness) may significantly contribute to the spread of *P. lateralis*. There is no sign at that location indicating to the public that the road is not open to motorized use. There is no gate or berm preventing use. (DS-016, page 29)

Response:
The example cited in the comment represents the current condition. It is the goal of the Travel Management Process to ultimately result in an MVUM that will designate the allowable uses of a route (and other factors such as season of use, class of vehicle, and other restrictions that could include risk of Naturally Occurring Asbestos or spread of *P. lateralis*. There is currently no MVUM available, pending completion of the NEPA process for Travel Management.

As stated as part of the Implementation Strategy (DSEIS page II-54):

- "Provide clear, consistent, and adequate signage that identifies routes designated open by type of vehicle per route and season open for use corresponding to the public MVUM and local travel map. Insure road and trail number identifiers are maintained as designated in the MVUM. Only as necessary, signing of dead-end routes leading to/stopping at rivers, streams, meadows, and other sensitive resources will be a priority to help protect resources from public wheeled motor vehicle damage."

Alternative 4 proposes to prohibit motorized use on the upper section of the 4103087 Road to limit vehicle traffic on a portion of the road system within the South Kalmiopsis Roadless Area. This proposal can be carried forward into the decision and through implementation to close a segment of road currently open to the general public. Therefore, the Forest considered a reasonable range of alternatives regarding this road segment that is compliant with CEQ regulations 40 CFR § 1508.25. Since this road pre-dates the 2001 Roadless Rule, it is not in conflict with prohibitions contained therein. (36 CFR § 294.14)

<u>Comment #13:</u> Clarification: DSEIS did not address the impact of wet weather motorized use (065)

Page A-48 of the initial FEIS states that "wet weather restrictions may be adopted for implementation of the Travel Rule based on the flexibility provided by the MVUM standards. This will be clarified in the FEIS." This was not in fact clarified in the FEIS or the new DSEIS. Nor did the DSEIS analyze the impacts of wet weather motorized use. (DS-016, page 32)

Response:
Wet weather restrictions are not related to the question of whether a NFS road, trail, or area is designated open. Many decisions currently in place provide for the application of seasonal closures as needed for resource protection. In fact, the DSEIS did add/clarify wet weather restrictions at DSEIS II-52, under Mitigation Measures, 8. Soil productivity:

> "Seasonal closures of motorized trails and roads will be enacted where driving during wet weather would cause or is causing excessive damage and erosion of road surfaces. **(E3, F3)**"

This direction is consistent with the 2005 Travel Rule and 36 CFR part 261, Subpart B--Prohibitions in Areas Designated by Order. The Forest Service believes that temporary, emergency closures based on a determination of considerable adverse effects should remain in place until the effects have been mitigated or eliminated.

By use of the term "mitigated," the Forest Service means the effects would be reduced to the point where they are not considered adverse effects. Mitigation better expresses the intent of the Executive Orders. These closures would remain in place until measures have been implemented to prevent future recurrence. (70 Fed. Reg. 68280 (2005)) Nothing in the Travel Rule limits the authority of the authorized officer to implement temporary, emergency closures pursuant to 36 CFR part 261, Subpart B, without advance public notice to provide for short term resource protection. (36 CFR § 212.52(b))

Therefore, the DS EIS has adequately addressed the need for temporary, emergency closures based on motorized travel when environmental conditions could cause considerable adverse effects. Thus, the EIS includes appropriate mitigation measures to alleviate adverse environmental effects pursuant to CEQ regulations at 40 CFR §§ 1502.14, 1502.16.

<u>Comment #14:</u> Clarification: reference to "opinion" papers and response (066)

At A-54 of the initial FEIS, the Forest Service claimed to be "familiar with these opinion papers that support conservation of ecosystems of the Klamath province." Peer reviewed, published articles are not "opinion papers" and the agency did not respond to them in the FEIS or the DSEIS. (DS-016, page 36)

Response:
The Forest is familiar with the publications of Strittholdt et al., Ross et al. and Caroll et al. regarding wildlife linkages in the Klamath-Siskiyou ecoregion. These papers support conservation of ecosystems of the Klamath province and make recommendations regarding land management and/or land allocations.

Since changing entire land allocations or managing in different ways than prescribed by the Forest Plans is not part of Travel Management, further consideration is not warranted. To clarify, the proposed land management plan amendments proposed in this process are not amending entire land management allocations; instead, they are proposed exceptions to authorize historical use on existing routes.

Therefore, the above-cited publications are not germane to this Travel Management process and are considered out-of-scope for further analysis.

<u>Comment #15:</u> Clarification: State OHV grant funding creates bias (067)

This planning process has been biased by the monetary reward to the agency from OHV programs that are funding the NEPA process. (DS-016, page 43)

Response:
This comment was addressed in the DSEIS as an "Out of Scope Issue," at page 1-21, (and previously in the Response to Comments for the 2009 FEIS):

> "The Forest made a request for state grant money from Oregon State Parks and Recreation Department (OHV grant funding) in January 2008. These funds are to be used for motorized use planning. There is no commitment, agreement or guarantee associated with these funds to provide any quantity or type of motorized or OHV uses. They simply are used to supplement federal appropriated funding to support planning. Funds were needed because there has been no specially appropriated funds to conduct an analysis of the transportation system for this designation process; Forest funding sources include Forest roads and trails appropriated funds, which are the same funds that are used for administration and maintenance of existing access facilities.

> As part of the designation process, advice was provided by the Forest Service that suggested that a mix of appropriated funding could be used to conduct this process. This advice is applicable for federally appropriated funds from Congress; there is no prohibition on a forest requesting grant monies to supplement the motorized-use planning process. State grants associated with this process allow an approximate 50/50 match with appropriated funds."

No other requests were made nor funds received to assist with funding for this process.

<u>Comment #16:</u> Correction: Gold Beach route description errors between Alternative 3 (p. II-27) & Alternative 5 (p. II-42) (068: FS observation)

DSEIS Chapter II contains inconsistent and erroneous descriptions of Gold Beach routes between Alternatives2 and 3.

Response:
These descriptions (regarding conversion of Maintenance Level 1 roads to motorized trails) will be clarified and made consistent in the FSEIS.

<u>Comment #17:</u> Clarification: The description of the McGrew "Trail" needs clarification; it is actually a FS Maintenance Level 2 road (069: FS observation)

Response:
The Forest has identified that reference to the McGrew "Trail" as a trail, can be confusing within the text of the DSEIS. This route is actually a FS Maintenance Level 2 road. This will be clarified in the FSEIS. This route is not in conflict with the Roadless Rule and has been a route (referred to as a trail but actually a road) for many decades.

<u>Comment #18:</u> Clarification: Applegate McKee Legacy Roads NEPA calls for closing and decommissioning roads (070)

The Motorized Vehicle Use DSEIS concludes (without analysis or documentation) that continuing motorized use of certain roads would result in no impacts. Hence the Applegate McKee Legacy Roads Decision Notice calls for closing and decommissioning harmful roads that the Motorized Vehicle Use decision [will] designate as open to recreational ORV mixed use riding. (DS-016, page 62)

Response:
The Applegate McKee Legacy Roads Decision Notice does call for closing and decommissioning roads that the Motorized Vehicle Use process designated as open to mixed use in the 2009 FEIS. As stated on page II-11 of the DSEIS, tables were corrected throughout that document to reflect implementation of the Applegate McKee Legacy Roads Project Decision Notice, which authorized decommissioning of 24.02 miles of road to improve watershed health.

As stated in the 2005 Travel Rule, "section 212.54 of the final rule allows for revisions to designations to reflect changes in environmental conditions, recreation demand, and other factors identified through monitoring pursuant to § 212.57 of the final rule. These revisions may include additions to the system, as well as route closures. (70 Fed. Reg., 68280 (2005)) Further, 36 CFR § 212.52 states, "[t]he public shall be allowed to participate in the designation of National Forest System roads . . . . Advance notice shall be given to allow for public comment, consistent with agency procedures under the National Environmental Policy Act [NEPA]. . . ."

The Applegate McKee project was compliant with the NEPA by providing notice, comment, and appeal rights. Due to implementation of the Applegate McKee project prior to implementation of the first iteration of the MVUM, the DSEIS acknowledged the changed conditions to the baseline National Forest Transportation System via the errata sheet. These errata changes were due to timing, and routes associated with the Travel Management process will be incorporated into the forthcoming FSEIS and MVUM to be in alignment with the Applegate McKee project decision. Therefore, routes closed or decommissioned in the Applegate McKee project will not be designated as "open" on the MVUM.

<u>Comment #19:</u> Clarification: Restrictions on dispersed camping within Riparian Reserve areas (071)

The 300 ft. allowance would retard riparian reserve recovery and violate Aquatic Conservation Objectives because streams attract dispersed recreation and camping. The proposed dispersed camping exemption would allow damaging off-road day use along streams and allow ATVs to damage more riparian reserve vegetation each year. (DS-016, page 71)

Response:
The concern identified in this comment is valid. Given the current list of activities generally prohibited concerning: *3. Dispersed Camping*, which are identified on page II-17 of the DSEIS, there appears to be a potential for motorized vehicles to encroach on Riparian Reserves and impact Aquatic Conservation Strategy Objectives.

To alleviate this concern, the FSEIS will incorporate an additional prohibition to require a 30-foot setback for motorized vehicles engaged in dispersed camping at any *existing* site near a stream course, wetland, or water body. This change is based on the Water Erosion Prediction Project model (WEPP). Applicable research from timber harvest actions concludes that a suitable riparian buffer will mitigate sediment effects to streams. The assumption used to create a 30-foot setback for motorized camping relies on the fact that camping is generally done on ground with a slope of 5% or less. Since slope is a substantial factor in sediment delivery to streams, the WEPP model found that buffers of 30 feet prevented sediment delivery to adjacent streams.

Therefore, it is reasonable to conclude that a 30-foot setback is sufficient to prevent sediment from reaching streams, wetlands or water bodies adjacent to dispersed camping sites. The 2005 Travel Rule was not intended to regulate camping, thus this restriction only applies to motorized vehicle access and parking, and not dispersed camping activities.

<u>Comment #20:</u> Correction: Unauthorized user created trails should be removed from the 2008 baseline (072)

The DSEIS failed to analyze impacts associated with including unauthorized and unnumbered motorized trails into the 2008 baseline road system. (DS-016, page 71)

Response:
After review of the Rogue River-Siskiyou road and trails (INFRA) database, it has become apparent that errors were mistakenly incorporated into the baseline trail system for the following unnumbered routes located on the Gold Beach District: Red Flat unnumbered trail and Shasta Costa unnumbered trail. These are considered user-created routes, totaling approximately 3.1 miles.

As stated in the 2005 Travel Rule, "[u]nauthorized roads and trails are not part of the forest transportation system and are not officially recognized by the Forest Service . . . ." After public consideration and appropriate site-specific environmental analysis, some user-created routes may be designated for motor vehicle use pursuant to § 212.51. Therefore, in order for these routes and other user-created routes to be added to the forest transportation system, a separate NEPA analysis would need to be completed at a later date. It is anticipated that numerous user-created routes exist across the Forest and the Responsible Official has decided that a separate NEPA analysis would be required to consider those routes for inclusion into the forest transportation system on a district-by-district basis. This Travel Management EIS's *Purpose and Need* is focused on existing system routes and minor changes to preserve existing historical motorized opportunities, while implementing Subpart B of the 2005 Travel Rule. Thus, user-created routes will not be included for consideration in this Travel Management planning effort.

<u>Comment #21:</u> Correction: need to include class of vehicle for motorized trails (073)

The proposed amendment for Game Lake, Lawson, Lower Illinois, Silver Peak Hobson Horn Trails and two connector trails failed to identify class of vehicle as required by Travel Management Rule. (DS-016, page 72)

Response:
Restrictions on vehicle class are based on trail widths and will be incorporated into the MVUM pursuant to 36 CFR 212.51. Vehicle class restrictions are not included in the NEPA document because they are not contingent upon the Responsible Official's discretion, and instead are dictated by physical capability of routes (i.e., trail width or mixed use analysis) and safety concerns. Therefore, the Travel Management DSEIS did not include vehicle class restrictions into the range of alternatives as alternative design elements. Nonetheless, as a courtesy, identification of class of motorized vehicle will be provided for each motorized trail considered in the FSEIS.

<u>Comment #22:</u> Correction/Update: sudden oak death quarantine area has changed (074)

The DSEIS does not address how proposed motorized routes might contribute to the spread of *Phytophthora ramorum* (sudden oak death) with the recently expanded Sudden Oak Death Quarantine Area. (DS-022, page 2)

Response:
The mechanisms of spread for *Phytophthora ramorum* (sudden oak death) has not changed and the effects analysis for Travel Management will remain the same. However, the FSEIS will recognize the most recent Quarantine Area and incorporate it into the FSEIS as a change in conditions since publishing of the 2011 DSEIS.

<u>Comment #23:</u> Clarification: Roadless Rule discussion and analysis not included in Chapter III (075)

The 2001 Roadless Area Conservation Rule also provides direction to the RR-SNF regarding motorized use in Inventoried Roadless Areas. However, we could not find where the rule is mentioned in Chapter III of the DSEIS. (DS-036, page 9)

Response:
Refer to Response to Comment #3 & #11. In summary, the 2001 Roadless Rule is mentioned in DSEIS Chapter III (page III-54). The 2001 Roadless Rule does not prohibit motorized trails in IRAs, nor does it prohibit National Forest Transportation System roads in existence prior to January 12, 2001. (36 CFR § 294.14)

In addition, all the proposed Action Alternatives comply with the 2001 Roadless Rule because continued use of existing roads and trails within IRAs is not road construction or reconstruction as defined by the rule. (36 CFR § 294.12) Further the proposed designation of existing roadways for motorized public use is not new and has occurred on all routes for many decades prior to promulgation of the 2001 Roadless Rule. Therefore, the roads being considered for continued authorization as open to motorized vehicles by the general public are not in violation of the 2001 Roadless Rule.

In fact, all the Action Alternatives propose to prohibit currently allowable cross-country OHV travel and various reductions in the miles of open roads and trails within IRAs. In particular, Alternative 5, the Preferred Alternative, reduces the amount of open roads by 14 miles and a reduction of the amount of open motorized trails by 30 miles. Therefore, Action Alternatives 3, 4, and 5 not only propose to preserve existing non-motorized uses; in fact, they enhance those opportunities by reducing areas, roads, and trails currently open to motorized uses in IRAs.

Nonetheless, the FSEIS will include a specific Roadless Rule discussion in Chapter I, Management Direction and in Chapter III, Significant Issue 5 (Roadless Character within Inventoried Roadless Areas). The purpose of this clarification will be to highlight management prohibitions pursuant to the 2001 Roadless Rule and provide a clear and concise analysis of the Roadless Rule against the project proposals contained in the FSEIS.

Substantive Comments – DSEIS Corrections and Clarifications: Maps

<u>Comment #24:</u> Road 4400-443 is a short private road not open to public (500)

Road 4400-443 is a short road into a Botanical Area from a private road. It is perhaps shown on Map 2 as open by mistake because it is impossible for the public to access it without trespassing across private property. (DS-006, page 2; DS-036, page 2)

Response:
Road 4400-443 was determined to cross a short segment of private land. As noted in Response to Comment #6, under the 2005 Travel Rule, motor vehicle use on State, county, municipal or private rights-of-way are not subject to the designations made under the final rule. 36 CFR § 212.55(d) specifically recognizes valid existing rights of easement holders or other legal documents that exempt certain users from the provisions of the final rule.

The FSEIS will clarify that no decision will be made for State and County roads and other roads *or road segments* not under the jurisdiction of the Forest Service. Acquisition of appropriate right-of way for this segment would be necessary to allow publication on an MVUM. Under this process, routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable or qualified for that use.

As stated in the DSEIS, Chapter II, section M (page II-56):

> "Designations may be revised as needed to meet changing conditions (36 CFR 212.54). Revisions to designations, including revisions to vehicle class and time of year, will be made in accordance with FSM 7712, 7715, and 7716. When a designated route is temporarily closed for more than 1 year, the MVUM would be updated to reflect the closure. When the route is reopened, the MVUM would be updated to reflect the reopening. No additional travel or environmental analysis would be required to support these temporary changes, which do not affect the underlying designation."

This will be clarified in the FSEIS.

<u>Comment #25:</u> Road 4400-445 is a fire line from Biscuit Fire; should not be a mixed use road (501)

Road 4400-461 should also be closed to motorized use. It serves no useful purpose because it crosses a Botanical Area and ends at the closed ridge road 4400-445. Perhaps it too is shown as open by mistake. The road was constructed as a fire line during the Biscuit Fire. (DS-006, page 2)

Response:
Road 4400-445 is identified in INFRA as a Maintenance Level 2 road, which predates the Biscuit Fire. It is considered a valid candidate for motorized use. Alternatives 4 and 5 both exclude this road yearlong to motorized use.

<u>Comment #26:</u> Since Botanical Areas are delineated with arbitrary straight lines, it is assumed they extend beyond mapped locations (502)

Since the Botanical Areas are generally delineated with arbitrary straight lines set on cardinal directions it is logical to assume that the actual Botanical Areas extend beyond the mapped locations. (DS-006, page 2)

Response:
Land allocations, including Botanical Areas are not defined with arbitrary straight lines. The location of all land allocations are defined and mapped by the Forest Plan. These land use allocations were promulgated via the 1982 Planning Rule (36 CFR part 219, Subpart A—National Forest System Land Management Planning) and in compliance with NEPA notice and comment procedures. As a result, the boundaries included in the Land and Resource Management Plans (LRMPs) for the Rogue River and Siskiyou National Forests (1990 & 1989, respectively) are the legal restrictions concerning the National Forest Management Act of 1976 plan components: objectives, Standards and Guidelines.

Thus, they are not arbitrarily drawn straight lines; instead, these areas have been carefully crafted given agency expertise and public involvement. The comment appears to identify a concern about potential sensitive plant populations that exist adjacent to official Botanical Area boundaries and that were not included in the protective standard and guidelines for particular land allocations. Unfortunately, standard and guidelines do not extend beyond their intended, mapped boundaries. However, where plant species exist that are included on the Forest Service's special status species list or listed under the Endangered Species Act, Forest projects must ensure compliance with substantive laws, regulations and policies, irrelevant of plan allocations.

Therefore, Botanical Areas do not extend beyond their mapped LRMP locations as depicted in the LRMP maps. In addition to plan allocations, some special legislatively withdrawn areas (e.g., Wilderness and Wild and Scenic Rivers) are legally defined with specific cadastral information. Some special areas/land allocations are actually surveyed and marked on the ground to provide for more accurate implementation of LRMP plan components. Regardless, this Travel Management process assesses impacts by motorized travel on designated routes through mapped land allocations and at known sensitive or listed botanical resources. (DSEIS, pages III-26 to III-29, III-89 to III-100)

<u>Comment #27:</u> Road 1040-850 is listed on Map 2 (Hinkle Lake) despite forest closure order (503)

Forest Service Road 1040-850 is listed in the proposed action "Map 2 Alternative 3" [and other alternatives] as a mixed use road open to motorized vehicle use, despite a long standing forest order closure. (DS-007, page 32; DS-030, page 1; DS-038, page 2)

Response:
This comment identifies an error on the DSEIS map production for the baseline road system that will be corrected in the FSEIS and during printing of the MVUM. Forest Service Road 1040-850 is closed by Forest Order (RSF-194) to motor vehicle traffic past the locked gate at T41S, R5W, section 16 NW1/4 or the NE1/4, Willamette Meridian. This Forest Closure will be part of the FSEIS listed road closures included in the designated system pursuant to 36 CFR Part 212, Subpart B-Designation of Roads, Trails and Areas for Motor Vehicle Use.

Comment #28: Road 3313-102 does not connect to 3680-220 (504)

A "C shaped loop trail" shown on Forest Service maps that seems to almost join the southern-most end of FS Road 3313-102 (SE corner of Sec. 32) is non-existent as either a road or trail. Based on our on-the-ground investigation, it's just a green meadow at its beginning with FS Road 3680-220. It is very vegetated and little passable beyond the first hundred yards (just after the forks two junctions). (DS-010, page 14)

Response:
Upon close review, there is no intentional connection between Road 3313-102 and 3680-220. Maps in the FSEIS will show this separation more clearly.

Comment #29: Road 20 in 40S 1W, section 26 crosses private land and is not covered by an easement (505)

The 20 Road on the Siskiyou Mountains RD, where it crosses private land in 40S-1W-26 is not covered by easement within the north half of the northeast quarter section. It is owned by Snowy Butte Timberlands. (DS-0113, page 2)

Response:
As noted in Response to Comment #6 and #24, the Forest recognizes its authority for route designation and has made clarification to the statements that will appear in the forthcoming FSEIS (Chapter I); "No decision will be made for State and County roads and other roads *"or road segments"* not under the jurisdiction of the Forest Service."

The comment is correct; the Forest has not secured a legal easement for Road 20 across the above-described portion of private lands. The Forest will continue to resolve access issues regarding National Forest Transportation System routes crossing private lands outside of this Travel Management EIS process. However, as a consequence of not having a deeded easement, the Forest is without authority to grant public access across this portion of Forest Road 20 and this situation will be reflected on the FSEIS alternative maps and the MVUM.

Comment #30: Nancy Creek Trail relies on private land access without an easement (506)

The Nancy Creek " unnamed connector" trail in T.35S; R11W sections 28, 33 and 34 is primarily used by class 1 vehicles that access this route via Road 273 and an unnumbered route in sec. 29. The Forest Service cannot designate motorized routes that rely on access via private land and whose destination is privately owned without first discussing motorized use with affected land owners and then obtaining necessary easements. (DS-016, page 80)

Response:
Refer to Response to Comment #6 concerning routes proposed for designation where potential exists that the Forest Service lacks adequate legal access rights. In summary, the Forest recognizes its authority for route designation and will make clarification to the statements that will appear in the forthcoming FSEIS

(Chapter I); "No decision will be made for State and County roads and other roads "*or road segments*" not under the jurisdiction of the Forest Service."

See Response to Comments #6, 24. Upon close review, the Nancy Creek Trail was found to cross private property at either end. An appropriate reroute around the private section has been identified but will not be analyzed at this time with this Travel Management process. Maintenance work would be necessary on this road to bring it up to appropriate standards prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use. The Nancy Creek Trail (#1181, previously identified as unnumbered) would not appear on the MVUM until the appropriate work has been done analyzing/implementing the reroute.

<u>Comment #31:</u> Motorized trail in T37S, R14W, sec. 13 is located in the BLMs Hunter Creek Bog ACEC (507)

Maps identify a motorized use trail that originates (or ends) in T. 37 S., R. 14 W., Section 13 that is not accurately mapped as it actually is located in the BLM's Hunter Creek Bog Area of Critical Environmental Concern (ACEC). The current management plan for the area prohibits motorized vehicular use of this area. (DS-048, page 2)

Response:
See Response to Comment #20. Comment is correct that approximately ¼ mile of this trail erroneously was mapped onto adjacent BLM managed lands. This will be corrected on maps for the FSEIS. This was not a designated route that was included in the baseline for analysis. It would require additional analysis to move forward as a motorized trail, and will not be brought forward in this current process.

<u>Comment #32:</u> Spur road to Onion Camp trailhead off of 4201 does not show on maps (508)

On both previous and current maps, the spur road that goes to the relatively new Onion Camp trailhead, off of Road 4201, does not show. This is a relatively popular trailhead with a vault toilet. (DS-036, page 2)

Response:
This comment identifies an error on the DSEIS map production for the baseline road system that will be corrected during printing of the FSEIS and MVUM. The road to the Onion Camp Trailhead will be shown as motorized on the alternative maps and MVUM.

<u>Comment #33:</u> Spur road to nowhere in IRA (Maintenance Level 1: 4402-535) should not appear on maps (509)

On maps, there is a faint spur to nowhere in an inventoried roadless area (4402-535) with a maintenance level objective of 1 that keeps showing up as a mixed use road. (DS-036, page 2)

Response:
Road 4402535 is shown as a Maintenance Level 2 road in INFRA database and is 0.6 miles long. This road was passable during the last assessment in 2013. It is adjacent to but not within an inventoried roadless area; the boundary of the IRA was designated in the 1989 LRMP Appendix C to exclude this non-conforming and existing road.

<u>Comment #34:</u> Road 4400-461 is a fireline and in IRA (510)

A ML 1 mining track from the Wimer Road (4402) now shows as being a no change mixed use road open to motorized travel. While its beginning terminus is 4402, it has a number on the Illinois

Valley RD transportation map of 4400-461, so it's part of the 4400 system. It has a ML Objective of 1 on the 2006 Driggs Report inventory of system roads on the East Side transportation zone. However, the track or its vicinity was made into a fire line during the 2002 Biscuit Fire and its quite visible now on Google Earth. (DS-036, page 2)

Response:
This comment identifies an error on the DSEIS map production for the baseline road system that will be corrected during printing of the FSEIS. Road 4400-461 is a Maintenance Level 1 road that will not be included for motorized use on the alternative maps and MVUM.

The "Driggs Report" was prepared under a FOIA request many years ago (2006), and is now outdated and in many cases incorrect. The existing condition, as reflected in the Forest route inventory and analysis of the transportation system completed August 2008, as well as all corrections and changes noted during this ongoing NEPA process, should be considered the current and most accurate inventory.

<u>Comment #35:</u> Road 195 encourages OHV use in adjacent North Fork Hunter Creek ACEC (511)

Regarding conversion of FS Road 195 to a motorized trail; the BLM has had an on-going-problem with ATV use occurring on BLM lands in the North Fork Hunter Creek ACEC (T37S, R14W, section 1, 2, 11, and 12), which is closed to ATVs. Riders access the BLM land from an unsigned trail, which is well known to the locals that originates off of Road 195. Our concern is that once the area is converted to a motorized trail and placed on a map there will be an increase in ATV traffic. (DS-48, page 2)

Response:
Careful analysis notes there are unauthorized routes that go west from Road 195, in proximity of the BLM Hunter Creek Area of Critical Environmental Concern (ACEC). There has been use noted on these routes. If Road 195 is designated, such continued use on these unauthorized routes would be illegal. Modifications to the selected alternative in the final decision are possible that would prohibit motorized use on Road 195.

See Response to Comment #58 and #102 for response to the assumption that placing a route on a map will increase use. As part of the *Assumptions for Analysis* the DSEIS states that "it is assumed that additional use [due to route closures] would not reach a threshold that would result in adverse resources. If effects occur, they will be mitigated through additional trail maintenance or seasonal closures." (DSEIS at III-3) This assumption is based on recreational data, which concludes that most trails being proposed for closure do not receive more than sporadic use by OHVs and typically this use is from localized residents. Therefore, there is no reasonable expectation that use would measurably increase for those routes/trails being considered designated "open" to OHVs after implementation of the Travel Rule, Subpart B.

Substantive Comments – DSEIS Chapter 1 Purpose And Need

Background

<u>Comment #36:</u> CFR 212.5 (Subpart A) requires identification of the minimum road system (1000)

The agency has refused to identify the minimum road system for safe and efficient travel in accordance with CFR 212.5 Subpart A (DS-016, page 30)

Response:
The Rogue River-Siskiyou NF (RRSNF) Travel Management Plan process incorporates the 2004 minimum roads analysis to support safe and efficient travel in accordance with 36 CFR § 212.5. (DSEIS at page I-19, IV-9) As stated in the final rule for *Travel Management; Designated Routes and Areas for Motorized Use*, "This final rule does not require responsible officials to reconsider decisions authorizing motor vehicle use on NFS roads and trails." (70 Fed. Reg. at 68268, 68269 (2005) In addition, recent litigation has substantiated agency interpretation that previous transportation analysis is sufficient to support road and trail designations pursuant to 36 CFR 212.51. (*Center for Sierra Nevada Conservation v. U.S. Forest Service*, 832 F.Supp.2d 1138 at 1156, 1157 (2011)) In *Center for Sierra Nevada* the court stated, "[A]lthough plaintiffs' arguments have identified various reasons why it might be preferable to conclude Subpart A before Subpart B, plaintiffs have not shown that the language of the regulation compels this ordering. On arbitrary and capricious review, the court will not reverse the agency merely based on the court's perceptions of prudence. The court, therefore, grants summary judgment to the defendants on plaintiffs' Travel Management Rule claim." (*Id.*)

As stated throughout this process, identification or "rightsizing" of the entire road system is neither a goal nor part of the analysis conducted for designation of motorized vehicle use on the RRSNF. The purpose of Subpart B of the Travel Management Rule is to designate a system of roads, trails, and areas for motor vehicle use (other than over-snow vehicle use) and end unmanaged cross-country motor vehicle use. In furtherance of this end, the RRSNF initiated this project and its corresponding purpose and need to address this section of the 2005 Travel Rule.

As noted in DSEIS Chapter I (page I-6) under Scope and Scale:

> **"For the RRSNF, this project and its analysis has focused on the change from the current situation.** A tightly focused process was developed; this includes a focused site-specific proposal that does not aim to solve all travel management issues at once. For example, this process does not analyze all existing system roads nor make recommendations on road decommissioning. This project's focus is on the designation of motorized public use for roads, trails and areas."

Subpart B of the 2005 Travel Rule is not intended to require reevaluation of the entire Forest transportation system. This process does not re-analyze all existing system roads nor make recommendations on road decommissioning. Other site-specific analyses and projects will undertake this compliance requirement. This project's focus is on the publication of a motor vehicle use map for public motorized use of previously authorized roads, trails and areas. (DSEIS page I-19)

As noted in the previous 2009 Response to Comments Appendix A, "This process does not aim to comply with 36 CFR 212 Subpart A (§212.5); other site-specific analyses and projects will undertake this compliance requirement." The requirements at 36 CFR 212 Subpart A (§212.5) will be met by the Forest and the Responsible Official. In addition, site-specific (project by project) Roads Analysis has and will continue to be accomplished in compliance with 36 CFR 212 Subpart A (§212.5)."

Purpose and Need

<u>Comment #37:</u> 36 CFR 212 Subpart A; the agency has completely re-written the projects purpose and need (1100)

Rather than address and implement the requirements of 36 CFR 212 Subpart A, the agency has elected at this late hour in the planning process to completely re-write the project's purpose and need in the DSEIS so that it will be better in line with the preordained and inevitable implementation of action alternative 5. (DS-016, page 2)

Response:
See Response to Comments #4 and 36. The *Purpose and Need* for action was clarified in the 2011 DSEIS to specifically note that the *Purpose* of this action is to implement Subpart B or the Travel Management Rule, and to identify that specific changes are *Needed* (DSEIS I-7). It is within the agency's discretion to clarify and/or modify the wording of its purpose and need for a proposed action. The clarification included in the DSEIS did not change the substance of the project's goals. Instead, the additional clarification was intended to assist the reader in understanding the initial goals and objectives to simply implement Subpart B of the 2005 Travel Rule.

As seen from comments to the original Final EIS, published November 2009, certain members of the public mistakenly believed that the project's purpose was to re-consider all transportation routes across the Rogue River-Siskiyou NF. However, the intent was to the contrary, it was and still is, the publishing of a Motorized Vehicle Use Map (MVUM), displaying the routes, trails and areas open to motorized use. The Rogue River-Siskiyou NF decided, after pre-scoping meetings and internal dialogue, that initiating a new inventory of all roads, trails, and areas, without regard to prior travel management decisions and travel plans incorporated into the Land and Resource Management Plans would be unproductive, inefficient, and counter to the purposes of the final 2005 Travel Rule, as well as disrespectful of public involvement in the past. This perspective is equally echoed by the final 2005 Travel Rule and forms the basis of the continued *Purpose and Need* of this project. (70 Fed. Reg. 68268 (2005))

Comment #38: Purpose and need did not include "minimize user conflict" like the Mt. Hood NF process (1101)

The Mt. Hood National Forest listed in their purpose and need, the need to balance motorized and non-motorized recreation. The RR-SNF has shown absolutely no intention of balancing these values. (DS-007, page 7)

Response:
The need to minimize user conflict is an inherent part of the Travel Rule, Subpart B. There is no requirement that each individual Forest's *Purpose and Need* statements be identical. NEPA allows flexibility in the formation of a project's stated goals and objectives as described in each purpose and need statement. (40 CFR § 1502.13; FSH 1909.15, chapter 20) It is within the agency's discretion to clarify and/or modify the wording of its purpose and need for a proposed action when comments received during a comment period reflect a general misunderstanding of the project's stated goals.

Comment #39: Purpose and need is incomplete when compared to the Travel Rule (1102)

The purpose and need of the DSEIS is incomplete when compared with the preamble of the Travel Rule. The DSEIS doesn't address the address natural resource issues because analysis is limited to areas where there's change and the need to preserve areas of opportunity for non-motorized travel and experience. (DS-036, page 6)

Response:
See Response to Comments #37 and #38 above. There is no requirement that the Forest's purpose and need statement be identical to the wording in the Travel Rule. It is within the Forest's discretion to develop the wording of its purpose and need to match the desired future condition to be achieved through the proposed action.

The comment asserts that the Travel Management EIS fails to address broader natural resource issues than those areas contemplating [wheeled motorized vehicle use] change. While a true statement, comment implies that this failure is a violation of law, regulation or policy; to the contrary, it is not a violation of the NEPA or the 2005 Travel Rule.

The NEPA process requires analysis where an agency action proposes changes from the current condition that have either a direct, indirect, or cumulative impact and can be linked by causation (cause-and-effect relationship) as a reasonably likely consequence of the action being proposed. (42 USC § 4332(2)(C); 40 CFR §§ 1508.7, 1508.8) As stated in the Travel Rule, "[n]othing in the final rule requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails on in areas on NFS lands and that were made under other authorities, including decisions made in land management plans and travel plans." (70 Fed. Reg., 68268 (2005); 36 CFR § 212.50)

Therefore, past decisions authorizing motorized vehicle use of existing travel routes or areas open to cross-country travel (baseline conditions) where the agency is not proposing changes via an alternative described in detail in the Travel Management EIS, is not considered an *action* necessitating an effects analysis. As a consequence, the assertion in this comment is without merit and not germane to this Travel Management process.

Out of Scope Issues

Comment #40: Signal Butte and Road 3680-195 may no longer be used as a communication site (1400)

Signal Butte and Road 3680-195 should be gated and closed and we have learned that it may no longer be in use as a communication site. (DS-010, page 5)

Response:
For clarification, the Signal Butte communication site and its access road are still being used by the Army Corps of Engineers pursuant to a communication site authorization. This remains an "Out of Scope Issue" because this road is not being designated for OHV motorized use under this Travel Management process. As the Travel Rule states, "uses exempted from these regulations [include] . . . [m]otor vehicle use that is specifically authorized under a written authorization issued under Federal law or regulations." (36 CFR § 212.51(a)(8))

In addition, the purpose of this Travel Management EIS process is to designate travel routes for publication on the MVUM; not to gate, berm or construct other barriers that prevent physical public access. (DSEIS, pages II-56 to II-64) The Forest Service considers that the agency already has authority to construct physical barriers on routes closed to the public; therefore, it is not a decision requiring NEPA. Barriers that prevent access are the prerogative of the Responsible Official and can be installed where such devices would prevent considerable adverse effects caused by unauthorized motor vehicle use.

Comment #41: Trombulack and Frissell article regarding roads not recognized (1401)

Attached to our scoping comments was a peer-reviewed article by Trombulack and Frissell (2000) detailing some of the negative impacts of road presence and use on Terrestrial and Aquatic ecosystems. We requested that the Forest Service address and mitigate the harmful impacts of motorized use detailed in this study. Yet the agency continues to ignore the direct and cumulative ongoing impacts of its extremely bloated NFTS road system on the environment. Designating and encouraging *additional* motorized use on the Forest Service road system via the MVUM is both a cumulative and connected action. (DS-016, page 65)

Response:
CEQ regulation 40 CFR § 1503.4 states that an agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and respond by one or more means, including explaining why a comment does not warrant further agency response. Trombulack and Frissell (2000) was reviewed; note citation in DSEIS Chapter IV, References. This article discusses the effects of roads on terrestrial and aquatic resources and recommends not building new roads in sparsely or unroaded areas and encourages removal of unneeded roads. The DSEIS clearly shows that none of the Action Alternatives propose any new system road construction or additional motorized use overall from the current condition. Thus, assigning this type of mitigation measure would be outside the scope (DSEIS pages I-6 to I-7) of this project.

Comment #42: Ortega and Capen; Marsh and Beckman regarding edge effects of roads not recognized (1402)

The edge effects, microclimatic changes and soil desiccation acknowledged by your colleagues in the Ashland Resource Area (Ortega and Capen (1999) and the Marsh and Beckman (2004) articles) were not disclosed and analyzed in the DSEIS. (DS-016, page 66)

Response:
CEQ regulation 40 CFR § 1503.4 states that an agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and respond by one or more means, including explaining why a comment does not warrant further agency response. Ortega and Capen (1999) and Marsh and Beckman (2004) were reviewed and found to focus on the response of forest roads to ovenbirds and salamanders in Vermont and the Southern Appalachians of Virginia, respectively.

The DSEIS clearly shows that no Action Alternative proposes additional motorized use overall from the current condition. Almost all routes that are being considered for designation under the Action Alternatives currently exist and are receiving some amount of use. Because of this existing use, regardless of which alternative is selected, detrimental effect to terrestrial wildlife habitat and populations from the motorized route network would either be reduced or maintained when compared to the current condition.

Substantive Comments: DSEIS Chapter II - Alternatives

Alternative Development Process

Comment #43: How can new motorized routes be proposed without disclosing ability to maintain? (1600)

The agency cannot propose to increase mixed use and codify ORV routes on existing roads that are poorly maintained without disclosing the ability of the Forest Service to maintain motorized roads and trails in an environmentally responsible manner. (DS-016, page 4)

Response:
In the DSEIS, the Forest Service analyzed the option of increasing mixed use by 6 miles under Alternative 3. In contrast, selection of Alternative 2 would maintain the amount of roads open to mixed use, Alternative 4 would decrease roads open to mixed use by 75 miles, and Alternative 5 would decrease roads open to mixed use by 184 miles (DSEIS, page II-64).

As discussed in the 2009 Response to Comments Appendix A:

> "For trails (motorized and non-motorized) and roads, a large portion of the maintenance program is funded under the Secure Rural Schools and Community Self-Determination Act of 2000 (Public Law 106-393). In addition, volunteers perform trail maintenance across the Forest. Congressionally appropriated funds for both road and trail maintenance have steadily declined in recent years and the Forest no longer has the traditional trail and road crew resources. Road and trail maintenance funding is a year to year issue. Under the current administration, funding for stimulus projects has gone to road maintenance to help maintain the existing road system."

Regardless of funds for maintenance, travel routes being proposed for designation are existing and will continue to exist after route designations are published. Thus, baseline impacts are occurring irrelevant of the uses being proposed through this Travel Management EIS process. Limited funding is incapable of being analyzed as a causation of environmental impacts from existing National Forest Transportation System roads and trails because there is no causal connection between funding and effects from OHVs. The Forest will continue to prioritize limited funding to those travel routes evidencing adverse environmental effects. The Forest retains authority to implement emergency closures for resource protection or to protect safety where routes are causing or will directly cause considerable adverse effects. (36 CFR § 212.52)

<u>Comment #44:</u> Proposed action should be supplemented with a plan to close and decommission unnecessary or damaging roads (1601)

The proposed action should be supplemented with a plan to close and decommission unnecessary or damaging roads (as determined through Travel Analysis as described in the directives for implementing the Travel Management Rule) to allow for maintenance of a road system that provides for public safety and ecological health. (DS-016, page 5)

Response:
An EIS shall document the examination of reasonable alternatives to the proposed action that meet the purpose and need and address one or more significant issues. (36 CFR § 220.5(e)) See Response to Comment #36. This project is implementing Subpart B of the Travel Management Rule, with a focus on the identification and designation of roads, trails, and specific areas for public motorized use. This process does not analyze all existing system roads nor make recommendations on road decommissioning. Other future site-specific analyses and projects will undertake this compliance requirement. (DSEIS, pages I-19 to 22 and II-56 to 64)

<u>Comment #45:</u> Closing Mule Mountain Trail was not analyzed in any alternative (1602)

Common sense would [also] lead one to believe that areas currently experiencing such illegitimate OHV use should be closed to motorized use as a way of achieving the goal of curtailing illegal use. The Mule Mountain Area is one such area. A measure to prevent future recurrence would include closing the Mule Mountain Trail system to OHV use. The impacts of this route were not analyzed in the DSEIS. (DS-007, page 22)

Response:
An EIS shall document the examination of reasonable alternatives to the proposed action that meet the purpose and need and address one or more significant issues. (36 CFR 220.5(e)) 40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects.

The option of prohibiting motorized use on the Mule Mountain Trail systems was analyzed under Alternative 4, as described in DSEIS page II-36:

"Prohibit motorized use on approximately 29.1 miles of trail that includes the Horse Camp Trail (#958, Cook and Green Trail (#959), and the Mule Mountain complex of trails: Mule Mountain (#919), Mule Creek (#920), Charley Buck/Baldy Peak (#918), and Little Grayback (#921)."

See the effects discussions described in DSEIS Chapter III for the various affected resources, in particular pages: III-23, III-38, III-43 to 49, and III-157 to 158. Therefore, this comment's assertion lacks sound basis regarding facts contained in the Travel Management EIS's range of alternatives considered in detail.

<u>Comment #46:</u> Closure of Summit Lake noted in ROG but not in TMP NEPA (1603)

According to the Recreation Opportunity Guide (ROG), motorized use along the Summit Lake trail includes a motorized closure "during the spotted owl nesting season which normally occurs from April 1 through September 30", yet no mention of such a closure is mentioned in the DSEIS or noted on "Map 2 Alternative 3." (DS-007, page 22)

Response:
A Guide to trails on the Siskiyou Mountains Ranger District (the Ranger District's Recreation Opportunity Guide) does state, "[m]otorized use is restricted during the Spotted Owl nesting season which normally occurs from April 1 through September 30." The DSEIS and Map 2, Alternative 3 do not discuss or display this seasonal restriction to motorized use because the purpose of these documents is to display Forest Service jurisdiction roads and motorized trails and changes to the current condition. The Forest is not proposing to change the seasonal restriction on this trail under any of the alternatives. In addition, the DSEIS (pages II-48 to II-49) does provide northern spotted owl restrictions during the critical early nesting period, March 1 to June 30 (which may be extended to September 30), based on site-specific knowledge and review by the District Ranger or Forest Biologist.

Alternatives Considered in Detail

<u>Comment #47:</u> Road 4400-445 and 4402-019 have noise, dust and POC disease issues, and are parallel to Road 4402 (1700)

Road systems 4400-445 and 4402-019 are located on Our Mountain, which is the southern divide of the South Fork Rough and Ready Creek. These roads only provide an approximate parallel route to 4402 and are not needed for reaching destinations such as Sourdough by motorized vehicles. (DS-006, page 2)

Response:
An EIS shall document the examination of reasonable alternatives to the proposed action that meet the purpose and need and address one or more significant issues. (36 CFR 220.5(e)) Roads 4400-445 and 4402-019 make up the route known as the McGrew Trail (also see Response to Comments #5 and #17). This route provides a 4x4 opportunity that is nationally known due to its rough, narrow and rocky travelway for highly experienced operators.

The topic of the McGrew Trail is discussed in detail in several sections of the Travel Management DSEIS and effects are discussed generally in other areas depending on the significance of the issues (i.e., whether there is a measurable difference in effects between alternatives). POC habitat is discussed at DSEIS pages II-66, III-21, III-48, III-70 to 73, III-100 to 113, and III-191.

The Sound Level issue is addressed in DSEIS Chapter III, pages III-162 to III-167. Alternative 4, which excludes the McGrew Trail, would have a potentially greater effect on reducing noise conflicts because these routes would be closed to motorized use.

The effects of dust are discussed on DSEIS III-79 and III-82. The direct effects of all Action Alternatives are considered to be negligible, with the largest change due to the removal of approximately 274,670 acres from cross country travel.

Therefore, adequate disclosure of impacts to the above-mentioned resources are contained throughout the Travel Management DSEIS to satisfy CEQ requirements at 40 CFR § 1502.16 to take a "hard look" at direct, indirect, and cumulative effects.

Comment #48: No map, information or analysis (aquatics and fisheries) on allowing motorized use in Oak Flat Campground (1701)

Currently no map or information exists identifying the Oak Flat Campground as an area open and designated for motorized use. The motorized use of this campground obviously represents a severe user conflict between motorized and non-motorized users. (DS-007, page 34)

Response:
For clarification, Oak Flat Campground/Gravel Bar (west) is a developed campground that is managed as a natural roaded area (INFRA database). Developed recreation sites are not part of the travel management process for motorized use.

See Response to Comment #19 and 60. Restrictions regarding motorized use (parking) on gravel bars and within Riparian Reserves would apply, as determined by a final decision for this process (FSEIS Chapter II on Motorized Access for Dispersed Camping will be clarified).

Comment #49: Road 1010 is open to motorized use within Ninemile Creek watershed may be inconsistent with BLM closures (1702)

According to DSEIS "Map 2 Alternative 3", FS Road 1010 is open for mixed motorized use. Currently, the BLM has closed the entire Ninemile Creek Watershed to OHV use due to resource damage, sensitive botanical species, impacts to riparian reserves, and coho salmon streams. Forest Service should make management consistent with BLM closures. FS Road 1010 also lacks a mixed use connection on adjacent BLM lands. (DS-007, page 37)

Response:
The Forest Service has no easement for the 1010 route on BLM lands. The Travel Plan does not address those routes which the Forest does not administer. This segment and the 299 spur will be eliminated from further analysis

Comment #50: Wilderness access, POC habitat, and fisheries habitat affected by McGrew and Sourdough Camp Trail and Road 4103-087 is not addressed (1703)

The McGrew Trail, Sourdough Camp, and Road 4103-087 have all been documented to provide illegal access to the Kalmiopsis Wilderness, into uninfected POC habitat, and quality ESA fisheries habitat. These impacts have not been adequately addressed in the DSEIS. (DS-007, page 40)

Response:
The NEPA directs that an EIS must "present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public." (40 CFR § 1502.14)

The topic of the McGrew Trail/Sourdough Camp (Route 44103-087) is discussed in detail in several sections of the Travel Management DSEIS and effects are discussed generally in other areas depending on the significance of the issues (i.e., whether there is a measurable difference in effects between alternatives). Wilderness access is discussed at DSEIS pages II-35, 36. POC habitat is discussed at pages II-66, III-21, III-48, III-70 to 73, III-100 to 113, and III-191. Fish habitat is discussed at II-67, III-35 to 50, III-69 to 73, and III-138 to 160.

Therefore, adequate disclosure of impacts to the above-mentioned resources are contained throughout the Travel Management EIS to satisfy CEQ requirements at 40 CFR § 1502.16 to take a "hard look" at direct, indirect, and cumulative effects.

<u>Comment #51:</u> McGrew Trail violates the Roadless Rule (1704)

The McGrew Trail violates the Roadless Rule by allowing use of a road and route wider than 50" in width. In fact, the FEIS identifies the McGrew Trail as "actually a road." (DS-007, page 40)

Response:
See Response to Comments #3, 10, 11, & 23. The comment is correct in regard to the assertion that the McGrew Trail is "actually a road." As stated on pages II-36, III-38, and III-93 of DSEIS, the McGrew "trail" is classified as a Maintenance Level 2 road and identified as the 4402-450. However, the condition of the route is such that it experiences limited use by the general public and is nationally known as a 4x4 route due to its rough, narrow and rocky travelway requiring a minimum of 6 hours to navigate by highly experienced operators. Thus, while included on the Rogue River-Siskiyou transportation system as a road, actual conditions are such that this road functions as a Class II, high clearance 4x4 trail. In fact, the Siskiyou Land and Resource Management Plan (LRMP) recognized these unique travel-ways and authorized them to be maintained as a Maintenance Level-2 route for use as ORV or Jeep trails. (Siskiyou LRMP, MA 14-6(g) at page IV-142)

Nevertheless, as discussed in the Roadless Rule comment responses, "A trail is established for travel by foot, stock, or *trail vehicle* and can be over or under 50 inches wide. (emphasis added) Nothing in the [rule] as proposed was intended to prohibit the authorized construction, reconstruction, or maintenance of motorized or non-motorized trails that are classified and managed as trails pursuant to existing statutory and regulatory authority and agency direction [contained in] FSM 2350. (66 Fed. Reg.3251, 3272 (2001))

Thus, the 2001 Roadless Rule does not prohibit motorized trails, even those over 50 inches, within IRAs. Nor does it prohibit National Forest Transportation System roads in existence prior to January 12, 2001. (36 CFR § 294.14) The Roadless Rule (36 CFR Part 294) clearly defines a road as a "motor vehicle travelway over 50 inches, unless designated and managed as a trail; therefore, the proposed routes within the Travel Management EIS are in conformance with agency policy, including the 2001 Roadless Rule."

In summary, the 2001 Roadless Rule does not prohibit National Forest Transportation System roads in existence prior to January 12, 2001. (36 CFR § 294.14) In addition, all the Action Alternatives comply with the 2001 Roadless Rule because continued use of existing roads and trails within IRAs is not road construction or reconstruction as defined by the rule. (36 CFR § 294.12) Further, the proposed MVUM designation of existing roadways for motorized public use is not new and has occurred on all routes for many decades prior to promulgation of the 2001 Roadless Rule. Therefore, the roads being considered for continued authorization as open to motorized vehicles by the general public are not in violation of the 2001 Roadless Rule.

<u>Comment #52:</u> Signal Butte area would be affected sensitive and cultural areas; not analyzed (1705)

Regarding the conversion of Maintenance Level 1 Roads 3313103, 3680190, 3680195, and 3680220 in the Signal Butte area to motorized trails; the DSEIS III-26 fails to provide adequate site-specific impact analysis for rare plants and cultural resources from expected increased motorized use or ongoing damaging use. (DS-016, page 84; DS-010, page 5)

Response:

An EIS shall document the examination of reasonable alternatives to the proposed action that meet the purpose and need and address one or more significant issues (36 CFR 220.5(e)). 40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects.

DSEIS pages III-94 through 97 address effects of the alternatives on Forest Service Sensitive vascular plants, bryophytes, lichens, and fungi and also on Survey and Manage vascular plants, bryophytes, lichens, and fungi. The text on page III-95 states "The Forest Service Sensitive vascular plants *Carex gigas* and *Arctostaphylos hispidula* are present immediately adjacent to a Maintenance Level 1 road in the Signal Buttes area on Gold Beach Ranger District that is proposed to be converted to a motorized trail under Alternatives 3 and 5. Although there is a slight possibility of a few individuals being lost during this conversion, there is little new disturbance off the roadbed itself expected and the viability of the local populations of these species are not expected to be affected.

Since the DSEIS was released, a vascular plant species new to science was described. It is the daisy *Erigeron stanselliae* which so far is only known in the Signal Buttes/McKinley Mine area, and near Flycatcher Springs. Although *Erigeron stanselliae* is not currently an FS Sensitive species, it undoubtedly will be given that status the next time the FS Region 6 Sensitive species list is updated. In summer 2012, FS botanists determined that *Erigeron stanselliae* in the Signal Buttes/ McKinley Mine area occupies at least 50-100 acres and is comprised of thousands of individuals. Effects of Alternatives 3 and 5 on *Erigeron stanselliae* are expected to be the same as described above for *Carex gigas* and *Arctostaphylos hispidula*, i.e., a slight possibility that a few individuals could be lost during the conversion of this level 1 road to a motorized trail. However, there is little <u>new</u> disturbance off the roadbed itself expected and the viability of the local population of *Erigeron stanselliae* is not expected to be affected. Discussion of this new species will be included in the FSEIS.

DSEIS pages III-94 through 97 also make it clear that there is reduced risk to rare plant populations across the Forest under Alternatives 2, 3, 4, and 5 compared to Alternative 1- No Action, because cross-country off-road/off-trail use would not be allowed. Accordingly, rare plant populations in the Signal Buttes area could benefit from any of the Action Alternatives because of this.

Under Alternative 4, the conversion of this Maintenance Level 1 road in the Signal Buttes area to a motorized trail would not occur. Text on page DSEIS III-95 states that "Alternative 4 provides indirect protection for FS Sensitive species [across the Forest] … by reducing the likelihood that OHVs would be in the vicinity of sensitive species occurrences with operators that are tempted to illegally leave roads and trails, potentially damaging plants and habitat. The additional trails closed under Alternative 4 to motorized use in serpentine areas, the Boundary Trail, and Botanical Areas, often have Forest Service Sensitive species occurrence and habitat which could be accessed and damaged by OHVs if their operators are inclined to leave the trails". Accordingly, rare plant populations in the Signal Buttes area might be less vulnerable to illegal off-road/off-trail use under Alternative 4 compared to the other Action Alternatives.

DSEIS pages III-180 through III-184 address the effects of the alternatives on cultural resources. DSEIS III-182 makes it clear that the conversion of ML1 roads to motorized trails under alternatives 3 and 5

would create more potential to impact cultural sites than eliminating these trails under alternative 4. In addition, "prior to approval of ground disturbing activities, a cultural resource survey will be completed. Any sites within the Area of Potential Effect will either be evaluated for significance with appropriate mitigation measures implemented, or avoided by project activities."

DSEIS pages III-181 also makes it clear that there is reduced risk to cultural sites across the Forest under Alternatives 2, 3, 4, and 5 compared to Alternative 1- No Action, because cross-country off-road/off-trail use would not be allowed. Accordingly, cultural resources in the Signal Buttes area could benefit from any of the Action Alternatives because of this.

<u>Comment #53:</u> No connection between 3860-220 and 3313-103; actually goes thru a meadow not analyzed (1706)

Presently, immediately east (continuing north) on the proposed motorized trail route north of Road 195, no defined road or trail even initially exist. However, most inappropriately, the motorized trail as proposed would cross a camas lily meadow that we understand may also be a cultural resource site. (DS-010, page 6)

Response:

As stated in the Travel Rule, "[u]nauthorized roads and trails are not part of the forest transportation system and are not officially recognized by the Forest Service . . . . After public consideration and appropriate site-specific environmental analysis, some user-created routes may be designated for motor vehicle use pursuant to § 212.51. Therefore, in order for this connector route and other user-created routes to be added to the forest transportation system, a separate NEPA analysis would need to be conducted at a later date. It is anticipated that numerous user-created routes exist across the Forest and the Responsible Official has decided that a separate NEPA analysis would consider those routes for inclusion into the forest transportation system on a district-by-district basis. This Travel Management EIS's *Purpose and Ne*ed is focused on existing system routes and minor changes to preserve existing customary motorized opportunities, while implementing Subpart B of the 2005 Travel Rule. Thus, user-created routes are not to be included for consideration in this Travel Management effort.

<u>Comment #54:</u> Conversion of Road 3680-351 to motorized trail creates adverse impacts on post fire restoration, soils and hydrology. (1707)

At A-29 of in the initial FEIS the agency responded to public comments regarding the inadvisability of converting currently closed ML 1 Road 3680351 into a motorized trail due to the impacts on post-fire recovery by stating that "the situation regarding restoration since the Biscuit Fire is accurate." The DSEIS continues the policy of refusing to analyze the impacts of designating recovering post-fire ecosystems to ORV use. (DS-016, page 25, 84)

Response:
Review of forest records indicate that portions of the 3680-351 and 3680-353 roads were previously obliterated and removed from the road system. These routes will be removed from consideration under all alternatives. These routes and others may be included in future travel project analysis where appropriate.

As stated in the 2005 Travel Rule, after public consideration and appropriate site-specific environmental analysis, some routes may be designated for motor vehicle use pursuant to § 212.51. Therefore, in order for this route and other user-created routes to be added to the forest transportation system, a separate NEPA analysis would need to be completed at a later date. This Travel Management EIS's *Purpose and Need* is focused on existing system routes and minor changes to motorized opportunities, while

implementing Subpart B of the 2005 Travel Rule. Therefore, these routes fall outside the scope of the current project's stated purpose.

<u>Comment #55:</u> Nancy Creek Trail impacts riparian, key watershed, BAs, IRAs and is contrary to ACS; not adequate analysis (1708)

In the DSEIS, the agency again refuses to analyze or disclose the impacts of the foreseeable increase in such use (on riparian areas, Key Watersheds, Botanical Areas and IRAs) that will result from encouraging and mapping such use on these trails via publication of the MVUM. (DS-016, page 26)

Response:
See Response to Comments #6, 24. Upon close review, the Nancy Creek Trail was found to cross private property. An appropriate reroute around the private section has been identified but will not be analyzed at this time with this Travel Management process. Maintenance work would be necessary on this road to bring it up to appropriate standards prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use. The Pine Grove Trail (#1160) would not appear on the MVUM until the appropriate work has been done analyzing/implementing the reroute.

<u>Comment #56:</u> Biscuit Hill Trail lacks site specific analysis; water quality, POC disease, sediment (1709)

Cursory and obviously uninformed analysis (DSEIS, page III-199) that the proposed motorized trail is along a ridge line and would not likely impact fish and water quality because of the distance for a stream. This analysis exposes the lack of site specificity of the DSEIS. In comments we submitted on the DSEIS, we included photos of this headwaters area of Biscuit Creek. It is on a ridge but is also a perennially wet area (most years at least). The photos show Port Orford cedar directly adjacent to the trail with their roots in the water and more cedar downstream. (DS-036, page 9)

Response:
40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects where project actions may cause environmental effects. In addition, when considering cumulative impacts agency must analyze the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions (40 CFR § 1508.7).

DSEIS Alternative 3 is the only alternative that includes this proposal. Alternatives 4 and 5 do not include it and do not propose to open any additional motorized routes within eligible river corridors.

The Travel Management DSEIS disclosed at page III-199:

"Alternative 3 proposes to open 2.30 miles of an existing ML 1 road 4402.494 to a motorized trail (Biscuit Hill trail) within the Bald Face Creek eligible corridor. This proposed motorized trail is located on a ridge adjacent to tributaries of the Bald Face Creek eligible corridor. Potential ORVs for Bald Face Creek are fisheries and water quality. This trail is along the ridge line and would not likely impact fisheries or water quality because of the distance between the trail and the streams. Any additional sedimentation would naturally filter into the soils prior to reaching the water bodies. This segment of the eligible corridor is classified as wild. Motorized use within a wild segment is generally prohibited, except for valid existing uses at the time of an eligibility study that are determined consistent with management direction. Therefore, opening this portion of the Biscuit Hill trail to motorized use would be in conflict with Forest Service policy contained in FSH 1909.12, Chapter 80, section 82.3. In addition to Forest policy, opening of the Biscuit Hill trail to motorized use would be in conflict with the June 1991 Settlement Agreement between the Forest Service and American Rivers Council, et al. This Agreement specifically requires the Forest Service to either defer projects within the eligible corridor that may adversely impact eligibility or accelerate the assessment so that final determination is made prior to a decision approving a project or activity.

In conclusion, while there is only a slight potential for impacts to fisheries and water quality associated with extending motorized use along this trail segment, there would be direct impacts to the eligible wild segment recommendation."

A final decision on Travel Management that would include this conversion would also require a determination of eligibility of the status as a Wild and Scenic River.

Assumptions and Elements Common to Action Alternatives

<u>Comment #57:</u> Allowing use based on historical use creates changes that were not analyzed (e.g. Illinois, McGrew, Sourdough Camp, Briggs Creek trails) (1800)

Altering existing forest plan prohibitions to allow historically illegitimate OHV use represents a "change in authorization or prohibition", allowing motorized trail use in this area is a "change" to the current condition and the agency has failed to adequately analyze that impact. (DS-007, page 39)

Response:
Plan amendments that authorize OHV use represent a "change" and must be analyzed in a NEPA document. The assertion that the Travel Management EIS "failed" to analyze these proposed changes is erroneous. 40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects where project actions may cause environmental effects. In addition, when considering cumulative impacts agency must analyze the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. (40 CFR § 1508.7)

The Travel Management DSEIS disclosed in Chapter II that proposed plan amendments incorporated into alternative design are considered changes. (DSEIS at pages II-22 to II-45) In addition, impacts to both the natural and human environment for proposed plan amendments are analyzed in detail throughout Chapter III. This analysis covered such topics as hydrology, botanical resources, motorized opportunities, soils, wildlife, and aquatics which are also incorporated in the Aquatic Conservation Strategy Objectives findings. (DSEIS at pages III-15 to III-22, III-28, III-42 to 45, III-63 to 67, III-71 to 73, III-121 to 135, III-142 to 159 and III-165)

In summary, the DSEIS concluded the following: 1) no effects to water quality because the trail tread would continue to exist, despite removal of motorized use and most trails only contribute localized sediment within the range naturally occurring; 2) effects to botanical resources by prohibition of OHV use on trails proposed for trail amendments would have no effect, so long as OHVs continued to stay on designated routes.

None of the proposed plan amendment routes are experiencing resource damage due to off trail activities; 3) proposed amendments would not result in changes to soil Total Resource Commitment (TRCS) or in Detrimental Soil Disturbance (DD) over current conditions, nor would closure change these indicators because trail tread would continue to exist. 4) no effect to Threatened, Endangered, Sensitive, or Management Indicator Species because existing motorized use would not result in modification in habitat, trails continue to exist and mitigation measures to provide for trail closures to protect resources are available, as needed. 5) no impacts to aquatics because most trails follow ridge tops of watersheds, motorized use does not affect coho salmon critical habitat; and 6) no additional effects regarding noise, in fact, user conflicts and noise disturbance are lessened because the number of trail miles available to motorized use would be reduced in both the Proposed Action (Alternative 3) and the Preferred (Alternative 5), and maintained as status quo in Alternative 2. Specific route plan amendments are not included in Alternative 4.

Therefore, the Travel Management DSEIS adequately analyzed the proposed LRMP amendments and determined that due to continued existence of trail tread, other uses, and the overall reduction in motorized trails under Alternatives 3 and 5, there would be no impacts associated with the administrative change. Thus, the EIS fulfilled the agency's obligation to take a "hard look" at impacts to the human and natural environment.

<u>Comment #58:</u> MVUM will create increased use of motorized routes and trails (1801)

The MVUM will direct OHV riders to areas and trails currently receiving little or no OHV use. By identifying these trails (many with BAs, BCNMAs, IRAs, RNAs, and BGWRAs) as motorized trails on the MVUM, the visibility and usage of these trails will increase. Routes designated as open to OHVs will start to appear on atlases, Oregon State Park OHV maps, Forest Service maps, county maps, etc. as OHV staging areas, this new visibility and motorized designation will facilitate increased use. (DS-007, page 57)

Response:
40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. The concern that publishing the MVUM will increase demand and use of designated routes was contemplated during formulation of the Travel Management EIS. However, NEPA requires analysis of reasonably foreseeable cause-and-effect relationships. (*Wilderness Watch v. U.S. Forest Service*, 143 F.Supp.2d 1186, 1209 (D. Mont. 2000)) Due to the sporadic, infrequent motorized use of most trails and the vast areas available, the agency is incapable of determining where or to what extent use will shift due to reduced opportunities. Currently, the Rogue River-Siskiyou National Forest publishes information on the external web site apprising recreationists of the motorized opportunities available on the Forest, as well as the State of Oregon promoting such recreation. Future publishing of motorized routes on recreation maps, is not a sufficient basis to predict increase OHV use on particular trails, nor is it a reasonably foreseeable action capable of analysis.

As part of the *Assumptions for Analysis* the DSEIS states that "it is assumed that additional use [due to route closures] would not reach a threshold that would result in adverse resources. If effects occur, they will be mitigated through additional trail maintenance or seasonal closures." (DSEIS at III-3) This assumption is based on recreational data, which concludes that most trails being proposed for closure do not receive more than sporadic use by OHVs and typically this use is from localized residents. Based on information during project development and implementation of the Prospect OHV system, the Rogue River-Siskiyou NF receives little use as a destination Forest for OHV activities, therefore, there is no reasonable expectation that use would measurably increase for those routes/trails being considered designated "open" to OHVs after implementation of the Travel Rule, Subpart B.

This assumption is applied to the Travel Management EIS, Chapter III analysis sections. Albeit, Alternative 4, which proposes the greatest reduction in motorized route opportunities, does consider some level of concentration, because only a few select trail opportunities (Prospect OHV and Elliot Ridge system) would be available. Nevertheless, the analysis concluded the minor amounts of existing motorized use on all trails, even when concentrated on a few select trails, would not cause measurable adverse effects to the resources identified and analyzed in the Travel Management EIS. (DSEIS, Chapter III)

Comment #59: Mineral exploration exemption compromises cross country restriction (1802)

All one needs do to avoid the "restrictions" on motorized use of ML 1 roads and for cross-country travel is to assert that one is "prospecting" (looking at rocks) and "believes the ORV use won't "significantly" harm surface resources. The impacts of this extremely broad exemption to the Travel Rule are neither analyzed nor disclosed in the DSEIS. (DS-007, page 59; DS-016, page 9)

Response:
The US Mining Laws, as amended, and the Organic Administration Act authorize any citizen (or person intending to become a citizen) the right to enter NFS lands for the purposes of prospecting, locating, developing, and removal of valuable deposits of certain minerals referred to as locatable minerals. (30 U.S.C. 22, 16 U.S.C. 479 and 482) The 2005 Travel Rule specifically exempts valid existing rights from the provisions of route designations. (36 CFR § 212.55(d)) The Rogue River-Siskiyou NF must comply with all provisions of the 2005 Travel Rule, including § 212.55(d). As a consequence, responsible officials must recognize that valid mining activities are exempt from the general public designations of the rule because miners are operating under the authority of the US Mining Law. However, the Forest Service has authority to protect surface resources in connection with operations authorized by the US Mining Laws. As such, the agency can regulate activities so as to minimize adverse environmental impacts to surface resources.

In summary, the mining regulations provide that any person entering federal lands identified within the Forest for the purpose of exploration, sampling, or beginning prospecting may use motor vehicles on all publicly maintained roads (including Maintenance Level 1 roads) without further authorization from the Forest Service. 36 CFR §228.4 specifically states that such use is exempt from notifying the Forest Service. Further, if an operator reasonably concludes that the travel associated with exploration, sampling, or beginning prospecting will not cause a significant disturbance of surface resources, cross-country travel could also be exempt from notifying or obtaining additional authorization from the Forest Service prior to conducting this activity.

The regulations do not specifically state that cross-country or off road travel requires authorization, but the regulations allow the operator to evaluate any activity associated with mining to determine if a significant surface resource disturbance might occur. Regulation states that when a Plan of Operation is required, the use of an off-road vehicle is prohibited until the plan is approved. (36 CFR §228.12) Thus, local Forest Service officials retain the authority to regulate uses under a written authorization and to determine whether and under what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use. (DSEIS at pages III-174 to 179)

<u>Comment #60:</u> Dispersed camping 300 ft. allowance will affect many acres that are not quantified (1803)

The dispersed camping allowance would allow OHV users to travel cross country throughout much of the forest including any area within 300' of the currently proposed 4,505 miles of "open" road. By multiplying the 300' by 4,505 miles of open road, many, many acres are in effect open for cross country use. The agency states that the proposed action will close 274,670 acres to cross country travel, yet this number and the analysis based off this number does not include the thousands of acres open to cross country travel under the dispersed camping exemption. (DS-007, page 60)

Response:
In order to address this comment, it is important to understand the 2005 Travel Rule terminology for both "designated areas" and "dispersed camping." The term "designated areas" is used synonymous with "cross-country travel areas" and defined by the 2005 Travel Rule as "a discrete, specifically delineated space that is smaller, and in most cases much smaller than a Ranger District. (36 CFR § 212.1) The purpose of these "areas" is to provide for opportunities for outdoor recreation by motorized . . . users." (70 Fed. Reg. 68268 (2005)) Whereas, "dispersed camping," again used synonymous with "cross-country travel," is defined as "the limited use of motor vehicles within a specified distance of certain designated routes . . . for the purposes of dispersed camping." (36 CFR 212.51(b)) Therefore, the two terms serve different purposes under the Travel Rule: one is for cross-country motorized recreation and the other is for limited access to overnight camping. Nevertheless, both are to be designated where resource characteristics are suitable or so altered by past actions that motor vehicle use might be appropriate. (70 Fed. Reg. 68274 (2005))

The Travel Management EIS recognizes this differentiation and included separate analysis for each concept (see generally, DSEIS, Chapter III). This is due mainly to the intended purposes for which motorized vehicles travel within these areas. Where access is for the limited purpose of dispersed camping, motor vehicles have the potential to have lessened impacts. Regardless, included in the DSEIS analysis is the recognition of beneficial effects to certain resources (i.e., hydrology, soils, botany and wildlife) from the closure of cross-country motorized recreation and limiting of motorized access to 300 feet for dispersed camping sites. (DSEIS at pages III-8 to 24, III-26 to III-29, 55 to III-68, 88 to 97, III-114 to 138)

The acreage used for the cross-county analysis included a 300-foot buffer around routes being considered available for dispersed camping, thus the 274,670 cross-country closure acres **does** remove those areas being considered as within 300-foot proposed allowance for access to existing dispersed campsites. Therefore, it is an accurate reflection of acres being closed to recreational motorized cross-country travel and is not an overestimate of acres being considered for closure. Regardless, any designation would be a reduction from the current condition and a benefit to NFS resources, not an irreversible/irretrievable commitment to resources. Therefore, under any of the Action Alternatives, there are no additional adverse impacts to resources when compared to the current condition, only a reduction.

Please refer to the DSEIS (page II-17) and the definition of the 300-foot allowance for access to existing dispersed campsites.

> "An "**existing dispersed campsite**" is an area obviously used by campers that usually contains a primitive fire ring and minimal ground vegetation as the result of motor or foot traffic."

The Forest has historically provided camping opportunities outside of developed campgrounds along open roads, bodies of water, and the termini of open roads and trails. Under all of the Action Alternatives, motorized vehicles would continue to be allowed to access **<u>existing</u> dispersed campsites** that are within 300 feet of the centerline of a Forest Service designated route. This allowance does not permit the establishment of new motorized routes to access dispersed campsites.

Also see Response to Comment #19 regarding protection of Riparian Reserves from access to motorized camping. In summary, the FSEIS will incorporate an additional prohibition to require a 30-foot setback for motorized vehicles engaged in dispersed camping at any *existing* site near a stream course, wetland, or water body. This change is based on the Water Erosion Prediction Project model (WEPP). The 2005 Travel Rule was not intended to regulate camping, thus this restriction only applies to motorized vehicle access and parking, and not dispersed camping activities.

<u>Comment #61:</u> No justification for illegal use cannot be analyzed or predicted (1804)

The contention that "this process cannot analyze or predict illegal activities" is baseless. The public has provided the location and documentation of ongoing resource damage from ORV use on the Forest. The agency has refused to address, analyze or disclose these impacts in this planning process. (DS-016, page 14)

Response:
This comment is referring to locations across the Forest where resource damage is occurring in violation of current closures, coincident with open cross-country travel, or where resource conditions have deteriorated due to weather events and subsequent motorized travel can exasperate conditions. In all these instances, decisions concerning route designation through this Travel Management process are unrelated to effects from the above-described situations. Wholly illegal acts are neither reasonably foreseeable events capable of NEPA analysis nor germane to agency decisions implementing regulatory direction. In general, criminal actions of 3rd parties are not required for NEPA considerations in effects analysis because it is too tenuous to make causal link between criminal acts and agency actions (*Glass Packaging Institute v. Regan*, 737 F.2d 1083). Therefore, the Travel Management process does not include an analysis of illegal damage due to the remote and speculative nature of illegal activities.

As stated in DSEIS page III-3:

> "Public education and enforcement of regulations are assumed to be effective and would generally limit public travel to designated routes. Though illegal use at some level is expected to continue, unless site-specific documented information is available, the exact location and extent cannot be predicted."

The Travel Management process cannot analyze or predict illegal activities. A certain amount of illegal activities are likely to continue under any scenario for motorized use, however, the goal of this process is to enact a system that would help to curtail illegal use, and provide a mechanism to allow enforcement citations for any illegal use.

This assumption is based on common sense, studies in other areas regarding human compliance (e.g., successes related to seat belt and drunk driving enforcement), and is the position of the agency. Non-compliance with laws and regulations occurs with all types of user groups including hikers, mountain bikers, equestrians, and OHV operators. The percentage of violators is small within each group. In general, the OHV community follows the laws and regulations on this Forest. There could be exceptions where trails and/or routes have been created illegally by OHV enthusiasts and other user groups.

<u>Comment #62:</u> Consideration for cumulative effects, e.g. road maintenance (1805)

The DSEIS fails to fully account for the effects of road maintenance and road use over time and space within the planning area and across the larger landscape. (DS-016, page 67)

Response:
The purpose of the 2005 Travel Rule is not to review and inventory all previously authorized National Forest Transportation System routes. As described in the comment responses to the 2005 Travel Rule, "nothing in this final rule requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails." (70 Fed. Reg. 68268 (2005)) The 2005 Travel Rule also assumes that the Forest Service maintains NFS roads and trails in accordance with their management objectives and the availability of funds. Regardless of which routes are open to the general public, all NFTS routes will require maintenance irrespective of availability on the MVUM.

Therefore, where no new decisions (i.e., a change from the current condition) are being proposed, the Travel Management EIS did not analyze as a project effect the consequences of continued maintenance because it is not connected to this project as a cause-and-effect relationship. However, where proposed changes in route designations are contemplated in the Action Alternatives, the Travel Management EIS does describe and analyze those changes in maintenance or route use designations. Also, continued maintenance is assumed as a part of the background effects and included in the analysis sections as an *Assumption for Analysis* (DSEIS at pages II-40, III-3 to 4; see also, Chapter III effects sections, generally).

Plan Amendments

Comment #63: No monitoring or new circumstances exist to justify allowing conflicting use in BAs, BCNMAs, RNAs (1900)

LRMP compliance monitoring was directed in the 1990 LRMP and has never been implemented leading directly to lapses in enforcement, the lack of forest orders to support management strategies identified as off limits to OHV use, and the "historic and ongoing" use by motorized vehicles in BA's, RNA's, and BCNMA's (use that has been prohibited for 20 years). The argument that existing use should be codified through plan amendments is invalid as no new circumstances or conditions exist to justify allowing such use. (DS-007, page 3; DS-016, page 7)

Response:
The Rogue River Siskiyou National Forest has complied with its regulatory responsibility pursuant to 36 CFR § 219.11(f) to provide annual monitoring and evaluation reports concerning Land and Resource Management Plan implementation progress.

While no formal monitoring has occurred regarding existing trails in Botanical Areas, Back Country Non-Motorized Areas and Research Natural Areas, the existing and ongoing motorized use is historically well known. The 2005 Travel Rule requires that "[d]esignations must be consistent with the applicable land management plan. If the responsible official proposes a designation inconsistent with the applicable land management plan, a proposed amendment to the plan must be included . . . ." (70 Fed. Red. 68268 (2005)) To comply with this provision of the Travel Rule, the Forest has proposed non-significant plan amendments. There are no requirements pursuant to the 1982 planning rule or the newly promulgated 2012 planning rule that the agency must justify plan amendments through monitoring reports or new circumstances. In fact, the agency has shown a long and consistent history of completing non-significant plan amendments on a host of issues related to project implementation and clerical corrections. (USDA, Forest Service, Rogue River-Siskiyou NF Monitoring and Evaluation Report (2012), pages 36 to 40)

Regarding the proposed plan amendments for certain management allocations, the Travel Management process for the Forest has initially and consistently identified the need for these Forest Plan amendments. These non-significant amendments are primarily to make historical and ongoing motorized use legal and in accordance with Forest Plan direction that is currently in error and/or inconsistent between the two affected Forest Plans.

Motorized use was ongoing prior to and at the time of Forest planning that created the Land and Resource Management Plans (1989 for the Siskiyou and 1990 for the Rogue River). The underlying need for plan amendments is to correct this error in knowledge and assumptions made at that time, which did not recognize this ongoing use. Further, during initial development, the two Forest Plans were not well coordinated between the adjacent Forests with sometimes conflicting management direction or Standards and Guidelines affecting the same route.

The clarified *Purpose and Need* statement in the DSEIS includes the following specific need statement regarding plan amendments (third bullet, page I-7):

- "amend the Rogue River and Siskiyou National Forest Plans to restrict motorized access to designated routes consistent with the Travel Management Rule and to provide consistent direction for conflicting plan allocations that will allow historical use of travel routes;"

<u>Comment #64:</u> Plan amendments would significantly change Standards and Guidelines, goals, etc. for all BAs, BCNMAs, RNAs (1901)

The proposed plan amendments would significantly affect the Standards and Guidelines, multiple use goals for long term land and resource management, and the long term relationship between goods and services provided. (DS-007, page 5)

Response:
Under the proposed Forest Plan Amendments, Forest management direction for recreation would be changed at RRNF LRMP page 4-24 to remove the prohibited uses on specified trails, in certain allocations (DSEIS Appendix B). Plan amendments would not change ***all*** Standards and Guidelines, just the ones in conflict with ongoing motorized use being recognized in this Travel Management Process.

The analysis of the significance of the proposed amendments was documented at DSEIS page III-208 thru 217. The Responsible Official determined that the amendments to both the Rogue River National Forest (RRNF) and the Siskiyou National Forest (SNF) Land Resource Management Plans (LRMPs) would not result in significant changes to the plans. The amendments affect areas where there has been historical and ongoing motorized use, including the Boundary, O'Brian, Sturgis Fork, Game Lake, Lawson, Lower Illinois, and Silver Peak Hobson Horn Trails. Therefore, no physical changes would be occurring on the land, leading to no change in the "long-term relationship between levels of multiple use goods and services originally projected."

Forest Service Manual (FSM) 1926 provides criteria for evaluation of significance. Examples of non-significant changes to a land management plan are: 1) actions that do not significantly change the multiple-use goals and objectives for long-term land and resource management; 2) adjustments of management area boundaries resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management; or 3) minor alterations to the Standards and Guidelines. The changes to the RRNF and SNF LRMPs are similar to these three actions.

Circumstances that may cause a significant change to a land management plan include: 1) changes that would significantly alter the long-term relationship between levels of multiple use goods and services originally projected (see section 219.10(e) of the planning regulations in effect before November 9, 2000); or 2) changes that may have an important effect on the entire land management plan or affect land and resources throughout a large portion of the planning area during the planning period. The changes to the RRNF and SNF LRMPs are not similar to either of these circumstances because the impact of the change would only affect the trail corridors within the management allocations and is not applicable to future trails/uses, only those identified in the proposed amendments.

<u>Comment #65:</u> Allowing motorized use exceeds 5% change threshold (RR LRMP P. 5-8) in Back Country Non-motorized (1902)

The current threshold of concern for semi-primitive non-motorized recreation as listed on page 5-8 of the RRNF LRMP is a 5% loss of the resource. Alternative 3, the proposed action represents such a loss in the BCNMA resource by allowing motorized use in both the Sherwood Butte and Grayback Mountain BCNMAs. Analysis of this 5% threshold was extremely inadequate and amounts to failure to respond to a substantive comment. No evidence, monitoring information, or factual information was offered to justify the agencies stance. (DS-007, page 6; DS-016, page 39)

Response:
The assertion in this comment is a mischaracterization of the summary table provided on page 5-8 of the RRNF LRMP. This table is not intended to operate as a Standard and Guideline for when a plan amendment is necessary. Instead, this table is a helpful guide to track plan implementation success or need for corrective measures. As for the specific assertion that Backcountry Non-motorized Areas will be impacted in excess of 5% by proposed plan amendments is unfounded because motorized use on existing trails has been occurring prior to and after the 1990 LRMP. Nevertheless, even if considered a change to the ROS (Recreation Opportunity Spectrum) classification, acres impacted by trail specific amendments would be less than .1%.

As described on pages 5-6 thru 6-7, "[t]he purpose of [Forest Plan] monitoring and evaluation is to determine how well objectives have been met . . . and to validate assumptions used in developing the Forest Plan . . . . When differences occur, they will be evaluated as to their significance, and appropriate changes, revisions, or amendments will be considered . . . ." Among other resources, Table 5-2 provides suggested thresholds on Forest Plan monitoring and evaluation criteria regarding a change in the Recreation Opportunity Spectrum (ROS) of 5% or more of acres, in total, for the ROS class. As trends in use change and acres of ROS classes are modified due to plan implementation, monitoring and evaluation are expected to guide revisions or amendments to continue to provide adequate recreational opportunities across the ROS. Therefore, the 5% threshold is a suggested guide for review of plan effectiveness.

The proposed Forest Plan amendments associated with the Travel Management process would not cause a change in acres of ROS because the proposed amendments merely correct historically erroneous management allocation Standards and Guidelines that were receiving motorized use prior to the 1990 LRMP. Thus, areas classified as non-motorized are not impacted because no new trails are being proposed, nor would expansion of use on existing routes be authorized. Instead, DSEIS Alternatives 3, 4, and 5 would remove currently available motorized trail opportunities by 17, 114, and 25 miles, respectively. This would in fact, **decrease the motorized** ROS class of semi-primitive and **increase non-motorized** class of semi-primitive correspondingly. This is because the proposed decreases in motorized trails are a change from the current condition and not associated with corrections to Forest Plan allocation errors.

As noted in the 2009 Response to Comments (#207), this comment is based on ROS (RRNF LRMP page 5-8) and is presented as a summary of the monitoring and evaluation thresholds of concern for the entire Rogue River portion of the Forest, in primitive, semi-primitive non-motorized and semi-primitive motorized recreational experience. The indicator is measured by change in acres and is not designed to be applicable to any one Management Area.

Motorized used on the Boundary Trail has no effect on acres and was occurring in 1990. The change in motorized use on the trail would be minor over the years since 1990 and would not represent a change in ROS or acres, and would not change/exceed the 5% threshold.

<u>Comment #66:</u> Motorized use in RNA required approval from experiment station (1903)

In the facilities section, the [RRNF] LRMP states that "no roads, trails, or other facilities will be permitted within these areas except those considered essential by the forest and range experiment station" (LRMP page 4-296). Motorized use of trails within RNA's would not represent access that is "considered essential" and neither the FEIS nor DSEIS documents approval by the Forest and Range Experiment Station. (DS-007, page 12)

Response:
See Response to Comment #63. As has been previously noted, motorized trail use in RNAs associated with the Boundary Trail were ongoing at the time of the RNA designation. Note that RRNF LRMP page 4-291 (Description) says "management activities" must be approved by the experiment station (now Pacific Northwest Research Station). This would imply *new* management activities, not ongoing.

The DSEIS included a proposed Plan Amendment regarding historical and ongoing motorized use (see DSEIS Appendix B, page B-20). The FSEIS will include additional wording for clarification regarding "new" roads, trails or other facilities in the proposed Plan Amendment.

<u>Comment #67:</u> Motorized use is inconsistent with "Interagency Strategy for Pacific Northwest Natural Areas Network (1904)

According to "The Interagency Strategy for the Pacific Northwest Natural Areas Network", "A number of concerns have already arisen over off road vehicle use…." (page 15). (DS-007, page 12)

Response:
The 2009 General Technical Report PNW-GTR-798: Interagency Strategy for the Pacific Northwest Natural Areas Network was reviewed for it applicability to the Travel Management Process for the RRSNF. As stated on page 14:

> "Future management strategies will also need to address appropriate uses of natural areas as human populations continue to increase in the region. This includes better understanding of the impacts of human activities on natural areas. A number of concerns have already arisen over off-road vehicle use, horseback riding, livestock grazing, harvesting wildland products like mushrooms and floral greens, hunting, fishing, and camping. Use is especially of concern for sites that have infrastructures such as trailheads, parking lots, or established camp sites that encourage human use. Misuse of sites may, in part, be the result of lack of knowledge or appreciation for the importance of natural areas. Thus, there is potential to reduce human-use impacts through public outreach, education, and greater on-the-ground presence."

This paragraph represents a general statement applicable to all RNAs….note that other human uses (not just motorized off-road vehicle use) are identified as current or future concerns. This paragraph (or the statement extracted from this paragraph in the comment) does not represent management direction or a Standard or Guideline applicable to this allocation. There is nothing specific in this comment or in the strategy that would apply to existing motorized use on this Forest.

<u>Comment #68:</u> Motorized use is not compatible in RNA as claimed in 2009 RTC #55 (1905)

According to the agencies answer to question #55 regarding OHV use in RNA's, the agency falsely claims that "motorized use is compatible on designated roads and trails in Research Natural Areas… and is in concert with forest objectives as stated in RRNF LRMP chapter 4." Yet LRMP standard and guideline #12, simply states that "off road vehicle use is prohibited" making no exceptions for designated roads or trails. The SNF LRMP simply states that "In areas designated RNA, the use of motorized equipment is prohibited" (SNF LRMP page IV-98). (DS-007, page 12)

Response:
Reference to Response to Comment #55 is from the 2009 Appendix A, associated with the 2009 FEIS. The Travel Management process for the Forest has initially and consistently identified the need for Forest Plan amendments. Non-significant Forest Plan amendments are primarily to make historical and ongoing motorized use legal and in accordance with Forest Plan direction that is currently in error and/or inconsistent between the two affected Forest Plans. Motorized use was ongoing prior to and at the time of Forest planning that created the Land and Resource Management Plans (1989 for the Siskiyou and 1990 for the Rogue River). The underlying need for plan amendments is to correct this error in knowledge and assumptions made at that time, which did not recognize this ongoing use.

DSEIS Alternatives 2, 3, 4 and 5 include Forest Plan Amendments to implement the 2005 Travel Rule and delete ORV Plan appendices. This would eliminate off-road vehicle use, in concert with Forest Plan Standards and Guidelines. DSEIS Appendix B specifically documents a proposed trail specific Plan Amendment for the RRNF LRMP to correct the inconsistency regarding RNA Standard and Guideline #12 (DSEIS Appendix B page B-20). Also see Response to Comments #9 and #64.

The reference in the comment to wording in the SNF LRMP page IV-98 is in regard to Backcountry Recreation (MA 6) and not RNA (MA 3). MA 3 at page IV-82 does not include language prohibiting motorized use of trails. In fact, under MA 3-2 [Recreation]; it states, "Existing trails may be allowed to remain as long as the RNA objectives are not compromised. DSEIS Appendix B contains a route-specific proposed plan amendment regarding RNA and the wording on SNF LRMP page IV-82 (page B-20) for historical use on the Boundary Trail and other connector trails.

<u>Comment #69:</u> Inadequate analysis and discussion of RNA effects and values (1906)

No evidence has been offered proving the compatibility of OHV use within RNA boundaries. Likewise, the DSEIS offers inadequate analysis of the potential impacts and their effect on RNA values. (DS-007, page 13)

Response:
40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects where project actions may cause environmental effects. (40 CFR § 1508.7). Analyzed as a Significant Issue for Botanical Areas, Research Natural Areas, and Special Plant Habitats, the Travel Management DSEIS disclosed affected environments, effects mechanisms, analysis and consequences regarding RNAs beginning at DSEIS page III-26. Effects from alternatives are specifically discussed for the RRNF and SNF on DSEIS pages III-28 and 29. Overall, no resource damage associated with motorized trail use with the alternatives was found to be occurring. However there would be some risk of adverse effects. Under Alternatives 4 and 5, this risk would be lessened due to restrictions on motorized use and could result in a beneficial effect.

A route-specific Plan Amendment was proposed for SIS LRMP Forest-wide Standards and Guideline MA3-2, at page IV-82 (see DSEIS Appendix B, page B-20) to make historical and ongoing motorized use of the Boundary Trail compatible with the SNF Forest Plan.

<u>Comment #70:</u> Plan amendments do not include OHV use in Cook and Green Botanical Area (1907)

Motorized trail use will also impact the Cook and Green BA, an area where OHV use was prohibited by the 1990 RRNF LRMP (LRMP page 4-149). Current LRMP amendments proposed under Alternative 5, do not include a clause for use within the Cook and Green BA, thus motorized use would be a violation of the LRMP. (DS-007, page 28)

Response:
While the RRNF LRMP confines motorized vehicle use in Botanical Areas to roads only, no Forest Order has ever been issued to prohibit this use in all Botanical Areas.

DSEIS Chapter II and Appendix B (page B-19) include a proposed route specific Plan Amendment to change the wording for Standard and Guideline #6, at LRMP page 4-149, for Botanical Area MS-12 to:

> "Motorized vehicles will be allowed only on roads except in emergency situations. Based on historical and ongoing use, the Boundary Trail (#1207), O'Brien Trail (#900), and Sturgis Fork Trail - Siskiyou Mountains Ranger District) is specifically designated for OHV Class III motorized use. Snowmobile use may be allowed when snow depth is sufficient."

This proposed amendment was part of Action Alternatives 2, 3, and 5 (DSEIS page II-19).

The Cook and Green Trail (#959) was found to go through the Cook and Green Botanical Area and likewise, would need a route specific proposed Plan Amendment for Alternatives 2, 3 and 5. The wording for Standard and Guideline #6 (RRNF LRMP at page 4-149) for Botanical Areas, will be revised in the FSEIS to include this historical and ongoing use.

<u>Comment #71:</u> Chance Creek Trail is within Chrome Ridge Botanical Area and inconsistent with LRMP (1908)

The Chance Creek Trail enters the Chrome Ridge BA which is inconsistent with LRMP Standards and Guidelines, no amendment was made to codify this use, thus is a violation of LRMP mandates. (DS-007, page 42)

Response:
Chance Creek Trail does border and may be within a small part of the Chrome Ridge Botanical Area. SNF Botanical Management Area 4 Standards and Guidelines for Recreation (LRMP, page IV-88) do not discuss or prohibit motorized trail use. In fact, under MA 3-2 [Recreation]; it states, "Existing trails may be allowed to remain as long as the RNA objectives are not compromised. Therefore this use is not inconsistent and no Plan Amendment is needed.

<u>Comment #72:</u> Failed to enact a plan amendment for motorized trail in Adams Prairie (MA 9) (1909)

The proposed motorized use in Adams Prairie (T35S; R12W; sec 20), is contrary to Siskiyou National Forest Plan direction to protect MA-9 wildlife meadows from motorized damage. (DS-016, page 81)

Response:
Adams Prairie is identified as a Special Wildlife Site in the Siskiyou Forest Plan, and the Siskiyou Forest Plan FEIS (page II-40) specifically identifies Adams Prairie as a meadow within that land allocation. Special Wildlife Site Management Area Standards and Guidelines for Recreation (page IV-115) states "[d]ispersed recreation (including trails) activities may be allowed in special sites; however, motorized activities should be prohibited except where such use is not detrimental to wildlife or botanical resources." However, the Forest Plan also states "[v]ehicle access should not be provided to meadows or meadow buffers, and no special use permits should be granted for long-term camping in meadows or meadow buffers." (SNF LRMP, page IV-115)

The trail referenced in the comment is an existing motorized route inventoried in the INFRA data base as route 3309910. As noted, existing motorized routes within MA-9 are allowed by the SNF LRMP (page IV-118); no adverse impacts to botanical or wildlife resources have been identified, therefore no Forest Plan Amendment is needed. Access off of this route would be limited to existing dispersed camp sites (DSEIS, page II-17). Damage cannot be predicted reliably, and would constitute illegal use (see Response to Comment # 61).

Additional (or new) Actions or Alternatives to Consider

Comment #73: Use of Road 4402-206 and 4402-259 should only be allowed under permit for special events and special access (2001)

Perhaps motorized use of Road 4402-206 and 4402-259 should only be allowed under special use permits for Tribal ceremonies, group camping, educational opportunities, and Wild and Scenic River and Wilderness access. (DS-006, page 3)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." The idea of permits for special events has been previously considered (DSEIS, page II-62). As previously noted, this idea has merit and a permit system could be implemented in the future as appropriate on both existing trails and any new trails that may be created in the future.

At the scale of the National Forest, this consideration was not found to be practical nor manageable, and would not be in the public interest. It could create additional problems with administration. Regarding the specific roads identified, general motorized use on these trails is relatively infrequent and resource damage from that use is minimal; it was decided to not implement a permit system on these trails at this time. A permit system is already in place for large group events (e.g., the McGrew Trail), with specific restrictions for resource protection. Port-Orford-cedar disease restrictions are also already in place. (DSEIS, pages II-50 to 51, and III-190)

Comment #74: Consideration for noise penetrating buffers and no motorized use in IRAs (2002)

The TMR states that the agency must "strike an appropriate balance in managing all types of recreational activities…while maintaining other important values and uses of National Forest System lands." Withdrawing all motorized use in IRAs and providing a noise penetration buffer around these areas would be a positive step towards maintaining these other important uses. (DS-007, page 15)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." DSEIS Alternative 4 considered and analyzed allowing no motorized use within Inventoried Roadless Areas.

Establishment of noise restrictions on motorized vehicles was considered in the DSEIS page II-61. The Forest Service did not study this idea in detail because noise is regulated by State of Oregon Standards (see Sound Level issue in DSEIS Chapter III pages III-162 to III-167) on public lands. While the Forest Service has the authority to enforce noise standards set by other Federal (typically EPA or OSHA) agencies and by the state under 36 CFR 261.13, accurate field-testing of noise from OHVs has been problematic for many enforcement entities.

The agency also has the authority to set specific limitations through special order 36 CFR 261.55 (j). While field-testing equipment is available, ambient noise can create erroneous readings, as can other environmental factors. Field tests have been successfully challenged in court, limiting the effectiveness of this enforcement tool. Therefore, this idea was considered but eliminated from detailed study.

<u>Comment #75:</u> Modify closure of Lower Illinois trail to begin at Forest Creek (just south of Fantz Ranch Shelter (to keep it as a motorized vehicle destination) (2003)

Consider either leaving this trail open to motorized use as in the Proposed Alternative (Alternate 3, Map 2), or modify the closure of this trail to begin at Forest Creek (just South of the Fantz Ranch) instead of at the Silver Peak/Hobson Horn Trail (#1166) junction. This would at least keep the Fantz Ranch Shelter available as a motorized vehicle destination and still eliminate any motorized vehicle impacts for a majority of the trail. (DS-011, page 1; DS-019, page 1; DS-023, page 1; DS-025, page 2)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." The suggested option was analyzed in Alternative 3 which proposed this route as motorized past the Fantz Ranch Shelter.

Since this option is part of an alternative and was analyzed, it remains an option for implementation in the final decision for Travel Management, as part of Alternative 3, or another alternative that could be part of a "blended" decision.

<u>Comment #76:</u> The gate to McGrew Trail and Sourdough Campground should be open May 1st each year and not closed until after hunting season in November (2004)

To maximize use opportunity, consider opening the gate to McGrew Trail and Sourdough Campground by May 1st each year and not closed until after the end of November. (DS-014, page 1; DS-042, page 2; DS-044, page 1; DS-045, page 1)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

The current timing of closures are mitigation measures previously established for this route to prevent the spread of Port-Orford-cedar root disease in compliance with the FSEIS and the Record of Decision and Land Resource Management Plan Amendment for Management of Port-Orford-cedar in Southwest Oregon, Siskiyou National Forest (USDA, USDI, 2004). DSEIS Chapter II, Mitigation Measures Common to All Alternatives (DSEIS page II-51) and DSEIS Appendix F contains more specific information. As such, the timing of closures, or changing the timing of closures is outside the scope of Travel Management analysis.

<u>Comment #77:</u> Consider Elk River Gravel Bars developed for day use and parking adjacent to roads (2005)

Camping is not appropriate for a small Wild and Scenic River such as the Elk River. The Forest Service has not shown that these areas are needed for camping as existing camp sites with no environmental impact are vacant (e.g., Sunshine Campground). Consider these bars be developed for day use with parking adjacent the road and safe trails provided for hike-in recreation. (DS-016, page 90)

Response:
See Responses to Comments #19 and #60. The 2005 Travel Rule does not regulate camping; motorized use restrictions only apply to motorized vehicle access and parking.

<u>Comment #78:</u> Consider a closer connector trail, East Fork Sucker Creek (2006)

Please consider a closer connector on an established, although little used trail, East Fork Sucker Creek Trail. This comes off the Boundary and ends on Road 472 (on documented older maps, FS Road 4041-A) but on the TMP Packet Supplied Maps, this Forest Service Road is numbered 472. This trail is an old established connector, although needing clearing at present. (DS-024, page 1)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

This route has been previously considered and carefully examined in the field; it is not maintained and is not used currently. It was found to contain steep sections, as well as potential riparian issues in the lower drainage portion if it were to be authorized for motorized use. It therefore will not be carried forward in this process and will be discussed in the FSEIS in Chapter II, Alternatives and Elements Considered but Eliminated from Detailed Study, (Alternatives Related to Route Designations).

<u>Comment #79:</u> Trail 904 off Boundary Trail could be kept in inventory (disperse usage) (2007)

Trail 904, Green Valley Trail is not mentioned as a loop off the Boundary Trail; this trail should be kept in inventory, and is usable with MRA volunteer labor. This would reduce and disperse usage from Sturgis Trail entry and exit. (DS-024, page 2)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

This route was not included in this Travel Management analysis. Therefore, in order for this route to be added to the Forest motorized transportation system, a separate NEPA analysis would need to be completed at a later date. See Response to Comment #20. The current condition of this short trail (approx. 0.25 mile), referenced as 904, would not allow for motorized use at this time. The trail can be hiked at this time. The utility of this trail as motorized would also depend on the final decision to allow motorized use on the Boundary Trail is this area.

As stated in the 2005 Travel Rule, "[u]nauthorized roads and trails are not part of the forest transportation system and are not officially recognized by the Forest Service . . . . After public consideration and appropriate site-specific environmental analysis, some user-created routes may be designated for motor vehicle use pursuant to § 212.51.

Therefore, in order for these routes and other user-created routes to be added to the forest transportation system, a separate NEPA analysis would need to be conducted at a later date. This Travel Management EIS's *Purpose and Need* is focused on existing system routes and minor changes to preserve existing historical motorized opportunities, while implementing Subpart B of the 2005 Travel Rule. Thus, user-created routes will not be included for consideration in this Travel Management effort.

Comment #80: Road 435 (Buskin Road) is a very good OHV Level 1 road (2008)

In Alternative 5, Road 435 is not included which is a very good OHV Level l road, providing an easy OHV route. Why was it excluded? (DS-042, page 2)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

This route was not included in this Travel Management process under any alternative. The Forest was unable to locate the route number 435 on any current Forest map or the INFRA database of designated routes in the vicinity of Biscuit Hill and Buckskin Peak. Many routes were not considered because they were not a part of the Forest's transportation system which was shown as the existing condition (Alternative 1 map). The Forest is not aware of any previous comments on this route that would have initiated analysis of the route under this planning process. Therefore, in order for this route to be added to the Forest motorized transportation system, a separate NEPA analysis would need to be completed at a later date.

Routes that are Designated for Motorized Use but are currently unusable

Comment #81: Road 1090-153 (intersection of 1010-150) is impassible due to vegetation and is not used (2500)

According to DSEIS "Map 2 Alternative 3", the proposed action would allow mixed motorized use on FS Road 1090-153. This spur road is currently impassable due to the density of vegetation and has received no motorized use for many years. The intersection of 1090-153 and 1090-850 is entirely obscured and impassable on account of thick vegetation. (DS-007, page 35)

Response:
Road 1010153 (not 1090153), is a Maintenance Level 2 road, 2.9 miles long. It is correct that the road is currently impassible due to lack of maintenance. Maintenance work would be necessary on this road to bring it up to appropriate standards prior to publication on an MVUM.

As stated in the DSEIS, Chapter II, section M (page II-56):

> "Designations may be revised as needed to meet changing conditions (36 CFR 212.54). Revisions to designations, including revisions to vehicle class and time of year, will be made in accordance with FSM 7712, 7715, and 7716. When a designated route is temporarily closed for more than 1 year, the MVUM would be updated to reflect the closure. When the route is reopened, the MVUM would be updated to reflect the reopening. No additional travel or environmental analysis would be required to support these temporary changes, which do not affect the underlying designation."

This will be clarified in the FSEIS.

<u>Comment #82:</u> Road 1055-120, 1055-400, 1055-500, 1055-700, and 1055-790 are historically impassible (2501)

According to "FEIS Map 2 Alternative 3", Roads 1055-120, 1055-400, 1055-500, 1055-700 and 1055-790 are open for mixed motorized use under the proposed action. These spur roads connecting with FS road 1055 are currently and have historically been impassable due to landslides, severe washouts, and culvert failures, in fact, Road 1055-500 is currently blocked by debris piles placed by the Forest Service to deter vehicle traffic. (DS-007, page 36)

Response:
Reference to "FEIS Map 2 Alternative 3" is taken to imply this map as associated with the 2011 DSEIS (which were the same). CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

See Response to Comment #81 (above). These roads are inventoried as Maintenance Level 2 roads. It is correct that these roads are currently impassible due to lack of maintenance. Maintenance work would be necessary on these roads to bring them up to appropriate standards, prior to publication on the MVUM.

<u>Comment #83:</u> Red Dog Trail is currently impassable and receives no use (2502)

The Red Dog Trail is currently overgrown, impassable, and receives no OHV use. The DSEIS, FEIS and ROD assert that no new OHV use will be facilitated by the proposed action, stating that all routes proposed currently receive some use. In the case of the Red Dog Trail, this claim is false. (DS-007, page 42)

Response:
See Response to Comment #81 (above). Red Dog Trail #1143 is 2.5 miles long and runs from Road 2512068 to Briggs Creek Trail. Currently, the trail shows as open to motorcycles only, per Ranger District input. The trail is grown over and steep in places and would need attention to make useable to all levels of riders; it also has moderate use by mining claim operators. Maintenance work would be necessary on this trail to bring it up to appropriate standards, prior to publication on the MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use.

<u>Comment #84:</u> Road 1060-500 is currently impassable and receives no use (2503)

According to DSEIS "Map 2 Alternative 3", the proposed action FS Road 1060-500 will be open for mixed motorized use. Road 1060-500 is currently and for many years has been impassable to motor vehicles of any kind. (DS-007, page 43)

Response:
See Response to Comment #81 and #82. Maintenance work would be necessary on this road to bring it up to appropriate standards, prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use.

<u>Comment #85:</u> Road 3313-103, 3680-190, 3680-195, and 3680-220 (Signal Buttes Area) are currently impassable and receive no use (2504)

Alternative 5 proposes converting currently designated as Maintenance Level 1 roads to motorized trails at Signal Butte and in the Hunter Creek area. This includes "3.9 miles on portions of Roads 3313103, 3680190, 3680195, and 3680220." The 2008 Gold Beach map would lead the reader to believe that spur road 220 connects with Road 190, in fact the western most portion of Road 220 is very narrow road, and not wide enough for even a jeep to reasonably pass through. In particular, Road 220 exists primarily as a trail along most of its western most length of approximately a half mile. To protect sensitive botanical and cultural resources in this area, Road 3313-220 should also be closed to motor vehicles its western most half mile. (DS-010, page 6, 8; DS-022, page 2)

Response:
One 1.2 mile section extending from Road 3313 is not a Forest Service designated route and was erroneously included in the baseline. It was not analyzed as an addition to the designated route system; therefore, it will not be brought forward in this process.

For other routes, see Response to Comment #81 and #82. Maintenance work would be necessary on these roads to bring them up to appropriate standards, prior to publication on an MVUM. Routes may not appear on the MVUM until suitable for that use.

<u>Comment #86:</u> 2512-091 Road is indicated as closed on FS maps (2505)

In previous comments, our organizations attached a Forest Service map indicating that the 091 road is in fact closed, photos illustrating maintenance, safety and resource concerns associated with (illegal) motorized use of the road, and we requested that the agency disclose the impacts of codifying and encouraging motorized use of this road on Key Watershed values, Port Orford Cedar, Wilderness Character, Roadless Character and soils. (DS-016, page 19, 90)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

See Response to Comment #81. The status of Road 2512-091 is unchanged from the 2009 FEIS and 2011 DSEIS. It is a Maintenance Level 2 road that currently allows public motorized use. Should adverse impacts from the road be noted, ongoing work to reduce impacts of the road system would be conducted under the Forest's road operation and maintenance program (DSEIS page I-9). Maintenance work may be necessary on this road to bring it up to appropriate standards, prior to publication on the MVUM. Roads are sometimes temporarily closed when impacts are severe, unsafe or block access this road may have been identified as closed in the past due to such issues.

<u>Comment #87:</u> Game Lake "loop": 1173, unnamed connector, and 1169 show no current use (2506)

Regarding the Game Lake Trail #1173 (T36S; R12W; sec. 27, 23); heavy shrub cover has grown over the trail in several locations indicating no motorized use in recent years. There are no visible ruts, tracks or affected vegetation, and no evidence of motorized use this year or in recent years. Assertions of "historical and ongoing [motorized] use" of Game Lake Trail 1173 stated in the proposed Siskiyou Plan Amendment are false and not supported by any verifiable data. (DS-016, page 74)

Response:
See Response to Comment #81. Maintenance work would be necessary on these roads to bring them up to appropriate standards, prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use.

There is known intermittent motorized use on these trails. The connector trail and the upper portion of #1173 are old mining roads. The lower portion of #1169 was heavily impacted by the Biscuit Fire. With maintenance, the loop formed by #1173, unnamed connector, and #1169 are potentially suitable for motorcycle use.

Comment #88: Lawson Creek Trail #1173 (near game Lake) does not have historical and ongoing use (2507)

The agency's environmental analysis needs to document that this entire trail is not appropriate for Class III motorized use due to shrub and tree growth and ever increasing numbers of fallen trees from the Biscuit Fire. Assertions of "historical and ongoing [motorized] use" of Lawson Creek Trail 1173 (T36S; R12W; sec 27, 22, 15) in the Siskiyou Plan amendment are false and not supported by any verifiable data. (DS-016, page 74)

Response:
See Response to Comment #81. Maintenance work may be necessary on this trail to bring it up to appropriate standards, prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use. There is known intermittent motorized use on this trail.

Comment #89: Nancy Creek Trail (unnamed connector) steep unsafe (2508)

The Siskiyou LRMP Specific Plan Amendment (DSEIS B-21) identifies two unnamed connector trails. One of the unnamed connector trails is called the Nancy Creek Trail. The Nancy Creek trail is an unauthorized, unmaintained, and unnumbered route. A second spur route branching north is an ATV user created route that connects to an unnumbered logging route extending from Road 3577. These trail grades exceed the target grade of 10-25% for the most challenging ATV Trail Class 2. Low site distance and steep grades creates unsafe conditions for ATVs and hikers. The potential for collision between hikers and ATVs adds to user conflict on the trail. (DS-016, page 75)

Response:
See Response to Comments #6, 24. Upon close review, the Nancy Trail was found to cross private property. An appropriate reroute around the private section has been identified but will not be analyzed at this time with this Travel Management process. Maintenance work would be necessary on this road to bring it up to appropriate standards prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use. The Pine Grove Trail (#1160) would not appear on the MVUM until the appropriate work has been done analyzing/implementing the reroute.

<u>Comment #90:</u> Illinois Trail and Hobson Horn Trail are impassable (2509)

Portions of Illinois River Trail and Hobson Horn Trail are located on narrow paths on very steep slopes that do not allow for the safe passage of a hiker and motorcycles or motorcycles traveling in opposite direction; motorized use creates safety hazards for hikers and motorized users. (DS-016, page 77)

Response:
See Response to Comment #81. Maintenance work may be necessary on these trails to bring them up to appropriate standards, prior to publication on an MVUM. Safety considerations could be addressed through seasonal use restrictions. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use.

<u>Comment #91:</u> Pine Grove Trail is a narrow single track hiking trail not suitable for OHVs and leads to private trespass issue (2510)

None of the Pine Grove Trail #1170 is suitable for ATV use as is proposed for the southern half because the tread is primarily a single track hiking trail. It is not suitable for ATVs because much of the trail is single track width on relatively steep side slopes. The northern section of the Pine Grove Trail (#1160) abuts private lands near the junction of the Rogue and Illinois Rivers. Motorized users are avoiding the steep lowest most ½ mile section by operating motorized vehicles on private property to access a less steep section further upslope. Trespass and resource damage is occurring on the private property. (DS-016, page 80, 81)

Response:
See Response to Comments #6, 24. Upon close review, the Pine Grove Trail was found to cross private property. An appropriate reroute around the private section has been identified but will not be analyzed at this time with this Travel Management process. Maintenance work would be necessary on this road to bring it up to appropriate standards prior to publication on an MVUM. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use. The Pine Grove Trail (#1160) would not appear on the MVUM until the appropriate work has been done analyzing/implementing the reroute.

<u>Comment #92:</u> Fish Hook Trail #1180 is too steep and narrow for motorized use (and inconsistent with web site description) (2511)

Fish Hook trailhead and trail to Fish Hook Peak is above West Fork Indigo Creek in North Kalmiopsis Roadless Area (T35S, R10W). This trail is very steep and narrow with lots of loose gravel and rocky areas that that would seem to make it too treacherous for safe or enjoyable use by motorcycles. There is no evidence of recent motorcycle use. Additionally, the Forest Service's current recreational trail website description for this trail http://www.fs.fed.us/r6/rogue-siskiyou/recreation/trails/fish-hook.shtml specifically acknowledges: "Trail is Not Designed for: Mountain Bike, Motorized Bike, ATV, 4-Wheel Drive, Barrier Free." (DS-016, page 87; DS-022, page 2)

Response:
See Response to Comment #81. Maintenance work may be necessary on these trails to bring them up to appropriate standards, prior to publication on a MVUM. These routes would require maintenance of the vegetation. Fish Hook Trail is a ridgetop, moderate level, Class III trail. Routes may be authorized under a forthcoming Travel Management decision, but may not appear on the MVUM until suitable for that use.

The referenced website does describe that this route was not designed for motorized use, as noted in the comment. However, historically most Forest Service Trails were not designed for motorized use, but many have been converted since then. If authorized, the forthcoming MVUM would clarify and authorize motorized use. Further coordination of local and district information and websites would occur when the MVUM is established.

Comment #93: Shasta Costa Trail is steep for motorized use and use is causing damage to meadows (2512)

The Shasta Costa Trail and off trail use exceeds slope standards for ATVs. Extreme erosion has been observed along the route, with clear evidence of multiple OHV incursions into the area's adjacent meadows. (DS-022, page 3; DS-016, page 88)

Response:
See Response to Comment #20. After review of the Rogue River-Siskiyou road and trails INFRA database, it has become apparent that errors were mistakenly incorporated into the baseline trail system for the Shasta Costa unnumbered trail. This trail is considered a user-created route.

As stated in the 2005 Travel Rule, "[u]nauthorized roads and trails are not part of the forest transportation system and are not officially recognized by the Forest Service . . ." After public consideration and appropriate site-specific environmental analysis, some user-created routes may be designated for motor vehicle use pursuant to § 212.51. Therefore, in order for these routes and other user-created routes to be added to the forest transportation system, a separate NEPA analysis would need to be conducted at a later date. It is anticipated that numerous user-created routes exist across the Forest and the responsible official has decided that a separate NEPA analysis will consider those routes for inclusion into the forest transportation system on a district-by-district basis. This Travel Management EIS's *Purpose and Need* is focused on existing system routes and minor changes to preserve existing historical motorized opportunities, while implementing Subpart B of the 2005 Travel Rule.

Comment #94: Sucker Creek Trail #1256 soil instability and safety concerns for motorized use (and inconsistent with web site description) (2513)

The entire length of Sucker Creek Trail #1256, along a steep forested canyon, is barely passible on foot, with may slide and down trees blocking the trail making it unsuitable for any proposed motorized use. It has soil instability and safety concerns. The Forest Service web site says the trail is not designed for motorbike use. Motorized use would increase erosion and worsen trail conditions for hikers. Currently the trail appears impassable for motorized use (T32S R12W sections 9, 10). (DS-022, page 4; DS-016, page 89)

Response:
See Response to Comment #81, #86 and #92. If authorized, maintenance work (maintenance of the vegetation) may be necessary on this trail to bring it up to appropriate standards, prior to publication on an MVUM.

Implementation Strategy

<u>Comment #95:</u> Consider identifying technical ORV trail classifications (2600)

The DSEIS ignores the fact that the decision to map, encourage and codify ORV use on remote, currently un-maintained, extremely technical trails (such as Silver Peak-Hobson Horn or the Red Dog Trail) will encourage inexperienced ORV users to find, and attempt to ride, these dangerous trails. 36 CFR 212.55 requires that public safety be considered when designating roads, trails and areas for motor vehicle use. (DS-016, page 33)

Response:
See Response to Comment #21, #35, and #58. Restrictions on vehicle class are based on trail widths and would be incorporated into the MVUM pursuant to 36 CFR 212.51. Vehicle class restrictions are not included in the NEPA document because they are not contingent upon the Responsible Official's discretion, and instead are dictated by physical capability of routes (i.e., trail width or mixed use analysis) and safety concerns. Identification of class of motorized vehicle will be provided for each trail considered in the FSEIS.

This comment is asking for consideration for technical classification (like ski runs) not just the class of vehicle. All MVUMs contain a standard disclaimer indicating that not all routes are suitable for all skill levels. Local Ranger District trail guides and websites could identify special concerns and difficulties.

Public safety was addressed in the DSEIS on page III-34. Prohibition of mixed use on paved roads would improve public safety. Closing some trails may decrease public safety due to increased density of use on fewer trails, however overall use is still anticipated to be light. Overall, DSEIS analysis found no significant effect on public safety among the different alternatives. A factor of public safety that was considered is that "reasonable users will stop and turn around when the challenge of the trail exceeds their ability" (DSEIS page III-31).

<u>Comment #96:</u> Physical signs are needed at approved dispersed campsites in Riparian Reserves (2601)

Physical signs are needed at approved dispersed campsites within Riparian Reserves. Dispersed camping sites along perennial streams should be identified on the MVUM. (DS-016, page 70)

Response:
Physical signs at every approved dispersed campsite in Riparian Reserves was considered. As stated in DSEIS Chapter II, section L (Implementation Strategy); regarding signage, "Only as necessary, signing of dead-end routes leading to/stopping at rivers, streams, meadows, and other sensitive resources will be a priority to help protect resources from public wheeled motor vehicle damage."

At the scale of the National Forest, given the number of sites, this consideration was not found to be practical nor manageable, would be costly and would not be in the public interest. It could well create additional problems with administration. Motorized use on these sites is relatively infrequent and resource damage from that use is minimal. Therefore, this alternative control method was considered but eliminated from detailed study. Also see Response to Comment #19.

<u>Comment #97:</u> FSEIS should address how NOA analysis will be considered in MVUM updates (2602)

EPA recommends that the FSEIS address how the results from Naturally Occurring Asbestos (NOA) analysis would be considered in travel management including future MVUM updates. (DS-047, page 1)

Response:
Measures can be taken to reduce exposure to Naturally Occurring Asbestos (NOA). In particular, measures to reduce exposure require user education and users practicing these measures. However, the Forest Service cannot regulate but only recommend use of these strategies. Required elements of the MVUM do not contain provisions for factors related to NOA. However, as stated in the DSEIS Chapter II, page II-53;

> "As part of the overall educational effort, the Rogue River-Siskiyou NF will provide an NOA informational web page and NOA visitor pamphlet/brochure available at ranger stations. Specifically, National Forest visitors wishing to reduce their potential exposure to NOA should consult the NOA map provided on the web page or at ranger stations identifying known areas of ultramafic and serpentine rock more likely to contain NOA.
>
> The Forest will use this web page to provide general public information concerning NOA, associated health risks, additional web links for related information, and strategies to reduce exposure. Any new information on risks to human health will be incorporated into the educational materials. This web site will be managed in coordination with the Forest Service, Pacific Southwest Region (Region 5) website on NOA, located at: www.fs.fed.us/r5/noa."

This information will also be included in the FSEIS. If there are proposed changes to routes that would increase disturbance, such as creation of new trails or changing an administratively closed road to a motorized trail, then site-specific analysis, including testing the ground surface material will be done to determine if the ground surface poses a health risk due to presence of asbestiform fibers. (DSEIS page III-81)

Monitoring

Comment #98: Comprehensive monitoring plan incorporated into FEIS was not included (2800)

A comprehensive monitoring plan incorporated into 2009 FEIS was requested by EPA and was not included; the public was allowed no meaningful comment on the monitoring protocol listed in the ROD and no meaningful analysis was undertaken. (DS-007, page 59; DS-016, page 33)

Response:
The CEQ Regulations (40 CFR §1505.2(c)) require that a Record of Decision adopt and summarize a monitoring and enforcement program applicable for any mitigation. The monitoring plan section in the 2009 FEIS (pages II-50 to II-51) and the 2011 DSEIS (pages II-55 to II-56) are identical and include a description of the monitoring elements and requirements for the project. A more detailed monitoring plan will be included as an attachment to the Record of Decision (ROD) that is specific to the alternative and actions selected in a forthcoming decision.

Alternatives or Actions Considered but Eliminated

Comment #99: Limiting motorized use to just roads is not out of scope and would meet purpose and need (2900)

Limiting OHVs to NFS roads as requested by the public is not out of scope and would meet the purpose and need of designating OHV routes according to the TMR. (DS-007, page 45)

Response:
This suggested alternative was heard during the previous DEIS and FEIS, and was responded to in the 2009 Response to Comments Appendix A. Some individuals felt that larger vehicles widen the trails designed and managed for motorcycles, thereby degrading the recreation experience. Others felt that larger vehicles cause damage to trails and should be restricted to roads that are able to sustain the impacts from their use. As noted above, part of the clarified *Purpose and Need* (DSEIS page I-7)

- "make minor, limited changes to the National Forest Transportation System to preserve a diversity of unique motorized recreation opportunities (e.g. 4X4 vehicles, motorcycles, ATVs, passenger vehicles) because implementation of Subpart B of the Travel Management Rule will reduce motorized recreation opportunities relative to current levels;"

Motorized trails provide a diversity of opportunities for different types of wheeled motor vehicles. Some trails are single-track only, and it is appropriate to designate such routes for motorcycle use only. However, other trails have been designed for, or have been historically used by, various other wheeled motor vehicles such as 4X4s and OHVs. Limiting wheeled motor vehicles other than motorcycles to NFS roads only, would fail to provide a diversity of road/trail opportunities, or a balance of experiences for the various wheeled motor vehicle classes, as well as inconsistencies with current trail designs and historical uses. Limiting OHV, truck, and automobile use to NFS roads would fail to meet the *Purpose and Need* for this project and was therefore considered but eliminated from detailed study (see DEIS page II-57).

Comment #100: Consideration for a permit system (2901)

At page A-45 of the initial FEIS, the Forest Service responded to requests that the agency develop an alternative that would consider designation of some trails as requiring a permit for motorized use by stating that "this idea has merit." The DSEIS at II-62 again acknowledged that "this idea has merit" while refusing to analyze such it as an alternative. Such a system, on controversial trails such as the Boundary Trail, Cook and Green, Mule Mountain, Silver Peak-Hobson Horn, McGrew Trail and the Illinois River Trail would allow non-motorized visitors to avoid those trails when a motorized permit was issued, allow the Forest Service to monitor motorized use to protect botanical and hydrological resources, and would make motorized use of such trails a special event to be planned for and enjoyed accordingly. (DS-016, page 31)

Response:
See Response to Comment #73. As previously noted, a permit system was considered and discussed at DSEIS page II-62. At the scale of the National Forest, this consideration was not found to be practical nor manageable, and would not be in the public interest. It could well create additional problems with administration. Therefore, this alternative control method was considered but eliminated from detailed study. However, a permit system will continue to be used on a case-by-case basis for specially authorized access including but not limited to the following examples: large groups, resource protection, or user-conflicts. For instance, the McGrew Trail is unique in its location, use and resource values to justify a permit system. This will provide a process to monitor use and effects, inform users about the environmental risks to reduce incidents which impact resources in the area, provide enforcement to prevent impacts, and still allow continued use of a popular 4x4 high clearance vehicle trail. (ROD page 2). Where trails receive relatively infrequent motorized use and resource damage from that use is minimal, it was decided to not implement a permit system on these trails at this time.

Significant Issue – Recreation (Motorized Opportunities)

<u>Comment #101:</u> User conflicts not analyzed or quantified (e.g., noise etc.) (3100)

The Mt. Hood National Forest TMP EIS analyzed the impact of motorized use on "quiet recreation", by quantifying the acreage in IRAs, Wilderness Areas, and other non-motorized areas that noise disturbance from OHV use would impact. The RR-SNF should also analyze this impact in Wilderness Areas, IRAs and BCNMAs. (DS-007, page 7; DS-016, page 7)

Response:
40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. There is no requirement that each nation forest analyze effects with identical methodology. Further, there is no requirement to specifically analyze impacts on IRAs, Wilderness areas or other non-motorized use areas. For the RRSNF, noise impacts or the "effect on quiet recreation" was not identified as a significant issue during Scoping.

"For the RRSNF, this project and its analysis has focused on the change from the current condition." (DSEIS page II-2) There are no noise impacts that would be created from additional motorized use; under all Action Alternatives, motorized use would be reduced over current conditions.

The situation with the Mt. Hood National Forest is much different than on the RRSNF: that forest is in proximity to dense population base (Portland area) and with much larger numbers of users. Given the amount of motorized use and the concern level from the large number of forest visitors, a noise analysis may have been very relevant to the Mt. Hood analysis. Given the focus on change from current conditions, the sporadic amount of motorized use and the smaller amount of public visitation, the RRSNF does not consider this type of analysis as necessary.

<u>Comment #102:</u> TMP implementation from MVUM designation will increase use in IRAs etc. (3101)

New user routes are currently being created in many of the IRA's proposed for motorized trail use (including the South Kalmiopsis, the Kangaroo, and the Little Grayback IRA's to name a few), user routes will proliferate and use of existing routes will increase due to TMP implementation, adversely impacting roadless area values. (DS-007, page 15)

BLM has a concern that once an area is converted to a motorized trail and placed on a map there will be an increase in ATV traffic. They understand that through this process any open cross country travel is prohibited and individuals can receive citations for such a violation. However, law enforcement in certain areas is problematic due to the open nature of the country and lack of resources available to federal agencies. (DS-016, page 33; DS-048, page 2)

Response:
See Response to Comment #35, #58, #61 and #133. 40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. The concern that publishing the MVUM will increase demand and use of designated routes was contemplated during formulation of the Travel Management EIS. However, NEPA requires analysis of reasonably foreseeable cause-and-effect relationships. Due to the sporadic, infrequent motorized use of most trails and the vast areas available, the agency is incapable of determining where or to what extent use will shift due to reduced opportunities. Currently, the Rogue River-Siskiyou National Forest publishes information on the external web site apprising recreationists of

the motorized opportunities available on the Forest, as well as the State of Oregon promoting such recreation. Future publishing of motorized routes on recreation maps, is not a sufficient basis to predict increase OHV use on particular trails, nor is it a reasonably foreseeable action capable of analysis.

As part of the *Assumptions for Analysis,* the DSEIS states that "it is assumed that additional use [due to route closures] would not reach a threshold that would result in adverse resources. If effects occur, they will be mitigated through additional trail maintenance or seasonal closures." (DSEIS at III-3) This assumption is based on recreational data, which concludes that most trails being proposed for closure do not receive more than sporadic use by OHVs and typically this use is from localized residents. Therefore, there is no reasonable expectation that use would measurably increase for those routes/trails being considered designated "open" to OHVs after implementation of the Travel Rule, Subpart B.

This assumption is applied to the Travel Management EIS, Chapter III, physical, biological and human resource analysis sections. The analysis concluded the minor amounts of existing motorized use on all trails, even when concentrated on a few select trails would not cause measurable effects to the resources identified and analyzed in the Travel Management EIS. (DSEIS, Chapter III)

Significant Issue – Inventoried Roadless Areas

Comment #103: Consideration for 10th circuit ruling regarding roadless area conservation (3200)

A new issue to consider is the October 21, 2011 ruling by the 10th Circuit Court of Appeals upholding the Roadless Area Conservation Rule that now must be implemented. Under this court decision, the Forest Service should close roads in the South Kalmiopsis Roadless Area to motorized use. (DS-006, page 1)

Response:
While this latest ruling came out after the DSEIS was published, Travel Management on the Rogue River-Siskiyou NF is not inconsistent with this ruling. This ruling essentially returns management direction to the 2001 Roadless Rule.

See Response to Comments #3, #10, #11, #12, #17, #23, #51 and #74. The 2001 Roadless Rule is briefly mentioned in DSEIS Chapter III (page III-54); specific Roadless Rule discussion will be added to Significant Issue 5, in the FSEIS Chapter III. The McGrew "Trail" is not in conflict with the 2001 Roadless Rule. There is no proposal to "construct roads or harvest timber" which are the activities the 2001 Roadless Rule identified as prohibited in IRAs. This will be clarified in the FSEIS.

Comment #104: DEIS fails to consider impacts to Forest Supervisor proposals for wilderness made in 2004 Biscuit FEIS (3201)

In a Forest Service news release in 2004, the Forest Supervisor supported the "consideration of 64,000 acres of land adjacent to the Kalmiopsis Wilderness for their outstanding wilderness character", the proposal has been supported by local state representatives and senators. Motorized trail use in this area would threaten the areas "outstanding wilderness character" and create obstacles to future wilderness designation. According to the DEIS, motorized trail use was prohibited within the proposed Copper-Salmon Wilderness stating that "use would be prohibited due to the proposed Copper Salmon Wilderness and to reduce impacts to the anadromous fishery" (DEIS II-25). It would seem reasonable to extend the same prohibitions to the proposed 64,000 acre addition to the Kalmiopsis Wilderness, for the exact same reasons. (DS-007, page 35)

Response:
As noted in the 2009 Response to Comments Appendix A, limited motorized use in this area (currently not wilderness) is ongoing and no new routes are being proposed. Therefore, proposals under this process to allow motorized use would not preclude future designation as wilderness.

The Biscuit Recovery Project FEIS (2004) evaluated the quality of Inventoried Roadless Area characteristics. That EIS did not make wilderness recommendations or propose wilderness. The Forest Supervisor recognized that some IRAs have wilderness quality but a proposal has not been formalized to Congress. That situation remains the same today.

Recommendations for wilderness are typically made during Forest Plan Revision processes. Any use found to conflict with a proposal for future wilderness designation could be changed or removed at that time. The situation with Copper Salmon Wilderness was different because a formal proposal had already been made and conflicting uses were identified and removed.

Comment #105: Signal Butte area would qualify as roadless; values not analyzed (3202)

Much of the land around the Signal Buttes area, and particularly when taken in combination with the BLMs adjacent Hunter Creek ACEC is roadless, or would quality as roadless under BLM and Forest Service roadless area identification criteria. Before additional development of these land can occur NEPA requires the disclosure of these unroaded values in an Environmental Impact Statement--as the Rogue River-Siskiyou National Forests Travel Plan DSEIS, neither addresses nor analyzes these areas special values. (DS-010, age 9)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." The DSEIS considered and analyzed roadless values. The discussion in Significant Issue 5 included potential wilderness and other undeveloped areas. As stated in the DSEIS page III-54;

> "The Rogue River-Siskiyou National Forest may have areas outside of IRAs that meet the criteria for potential wilderness. These uninventoried roadless areas are analyzed at a project specific level to determine the effects to wilderness characteristics. Forest Service Handbook (FSH) 1909.12, chapter 70, sets forth the guidance on inventorying areas that may be considered as potential wilderness areas. When projects could have a likelihood to impact potential wilderness areas, the Forest Service will evaluate projects against the characteristics found in FSH 1909.12, chapter 72.1 (Capability). In addition to potential wilderness, there may be acres of other undeveloped areas. These are areas that are not IRAs and do not meet the Forest Service's definition of potential wilderness. However, these areas may have special resource values due to their undeveloped character and are most commonly identified and evaluated within project-specific NEPA.
>
> Under all action alternatives, no proposals are made that would create additional roads, harvest timber, or create other developments. Thus, the **Action Alternatives** will not adversely affect Wilderness characteristics (i.e. the naturalness, undeveloped character, opportunities for solitude, special features or values, or manageability) of potential wilderness areas or special resource values of other undeveloped areas. Therefore, this document does not inventory or analyze those areas within the project area."

Significant Issue – Public Safety

Comment #106: Motorized use on steep narrow winding trails creates a safety risk; need safety analysis for motorized trails (3300)

It appears that no safety analysis was prepared for the motorized trails illustrated on Map A-6 in the 2009 ROD and carried forward with the DSEIS. The proposed Siskiyou LRMP amendment to allow motorized trail use lacks adequate safety analysis and jeopardizes hikers and motorized

users. The Forest Service is responsible for reasonable safe travel when they produce a MVUM with specific trails and class of vehicle. (DS-007, page 19; DS-016, page 77)

Response:
40 CFR § 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects where project actions may cause environmental effects. (40 CFR § 1508.7) Public safety was addressed in the DSEIS on page III-34. Prohibition of mixed use on paved roads would improve public safety. Closing some trails may decrease public safety due to increased density of use on fewer trails, however overall use is still anticipated to be light. Overall, analysis found no significant effect on public safety among the different alternatives. See Response to Comment #95.

The DSEIS followed agency direction through inclusion of a mixed use analysis completed pursuant to FSH 7709.55, chapter 30 Engineering Analysis (DSEIS page III-33). In addition, the DSEIS includes mitigation for roads identified as "high risk" to allow mixed use in conjunction with prohibiting mixed use on roads where mitigation would not be effective (DSEIS pages II-47 and III-33).

There is no requirement for an overall mixed use analysis of trails. All MVUMs contain a standard disclaimer indicating that not all routes are suitable for all skill levels. General disclaimers regarding mixed use trails can be provided by local Ranger District trail guides and websites; these sources could identify special concerns for safety and difficulties.

Comment #107: Lack of parking at trailheads; e.g. Mule Mountain, Charlie Buck, Little Grayback, Baldy Peak (3301)

Another issue associated with safety concerns is the lack of parking for OHV trailers and trucks at the Mule Mountain Trailhead. The trailhead lacks parking and lies on a blind, narrow, and dangerous bend in Upper Applegate Road. The road is maintained by the county and the public safety concerns have not been analyzed. (DS-007, page 19)

Response:
See Response to Comment #45. Regarding the Mule Mountain Trail and parking at its trailhead on Upper Applegate Road, the option of prohibiting motorized use on the Mule Mountain Trail systems was analyzed under Alternative 4, as described in DSEIS page II-36. Modifications to the selected alternative in the final decision are possible that would prohibit motorized use on the Mule Mountain Trail systems. If this were the case, the existing trailhead would be for non-motorized use.

Regarding the rest of the identified trailheads, based on analysis, the Forest Service believes that the parking is adequate at these trailheads for the use that they receive.

Comment #108: No indication that health and safety news articles were reviewed in DSEIS (3302)

In response to a number of news articles detailing the ever-increasing number of human injuries and fatalities resulting from ORV use on public lands, at A-51 of the FEIS the agency states that "the web sites referenced will be reviewed by the planning team." The new DSEIS contains no indication that such a review occurred. (DS-016, page 33)

Response:
CEQ regulation 40 CFR § 1503.4 states that an agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and respond by one or more means, including explaining why a comment does not warrant further agency response.

The 2009 FEIS did not specifically list these or respond to these news articles….that doesn't mean they were not reviewed (in 2009). In looking at these references, they are clearly from 2007 and 2008; now over 5 years old. Given the age of these articles, no specific response was made in the 2011 DSEIS.

The Forest Service is continually reviewing articles and published literature, including ones related to health and safety and motorized vehicle use on national forest lands. It is not required (or feasible) to list or respond to all of the various safety articles and publications that have been reviewed. Such a listing would occur if the analysis conducted for this process utilized or incorporated a relevant publication.

Public safety was addressed in the DSEIS on page III-34. Prohibition of mixed use on paved roads would improve public safety. Closing some trails may decrease public safety due to increased density of use on fewer trails, however overall use is still anticipated to be light. Overall, analysis found no significant effect on public safety among the different alternatives.

Significant Issue – Hydrology (Water Quality and Erosion)

Comment #109: Failed to disclose hydrologic effects and ACS site-specifically by watershed (3400)

The initial FEIS failed to disclose and analyze ongoing and proposed site-specific watershed degradation caused by motorized use in key watersheds, wild and scenic river corridors, riparian reserves and POC watersheds that has been photo-documented and submitted to the agency by our organizations. The new DSEIS continues this trend. (DS-016, page 15)

Response:
The CEQ Regulations (40 CFR §1500.1) state that "…[m]ost important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail…The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions to protect, restore, and enhance the environment…"

As stated in the DSEIS (pages III-12 to III-13) the project proposes to make primarily administrative changes making existing LRMPs consistent with known existing travel uses; proposals to eliminate or designate mixed use on existing roads would present no change to current hydrologic conditions. None of the Action Alternatives propose substantial ground disturbing activities such as road removal, restoration, or decommissioning. Only DSEIS Alternative 3 contains proposed actions that are not already part of the current condition. In addition, ongoing monitoring would identify any roads or trails presenting a potential sediment source and mitigation of impacts due to road alignment, slope instability, or poor drainage would occur through the Forest's standard road maintenance schedule.

In other words, it is expected that there would be no change to aquatic resources from the current hydrologic condition. As such, analyzing and disclosing project impacts to hydrologic condition and the ACS site-specifically by watershed would not provide a meaningful comparison between the current condition and the Action Alternatives that would help the public understand the difference in effects between alternatives, or better inform the Responsible Official's decision.

However, the DSEIS does contain analysis and disclosure of project impacts related to hydrologic condition in the following sections: Key Watersheds (DSEIS, pages III-15 to III-17 and III-69 to III-73), Wild and Scenic River corridors (pages III-187 to III-201), Riparian Reserves (pages III-69 to III-73), and Port-Orford-cedar (POC) management (pages III-69 to III-73 and III-100 to III-113).

Comment #110: No disclosure of effects from Willow Lake Play Area (Big Butte Springs watershed) (3401)

Despite the request from the Medford Water Commission, the agency has again refused to analyze or disclose the foreseeable effects from Willow Lake Play Area (Big Butte Springs Watershed) from motorized use activities in its DSEIS. (DS-016, page 21, 33)

Response:
The DSEIS did discuss the Willow Lake Play Area with the Big Butte Springs Watershed in the DSEIS at page III-23. The development of this play area is only included under Alternative 3. Alternatives 1, 2, 4, and 5 (the Preferred Alternative) do not propose or include the development of a new play area on the High Cascades Ranger District.

<u>Comment #111:</u> Cook and Green Trail contains 20 riparian crossings; not analyzed (3402)

Page II-36 of the DSEIS states that closure of the Cook and Green Trail to motorized use "would help protect sensitive plants indigenous to southwest Oregon" located in the Cook and Green Botanical Area, yet the agency refused to close the hiking trail to ORV use in the previous ROD and undoubtedly will refuse to close it to motorized use in the forthcoming ROD. (DS-016, page 38)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." 40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects.

The alternative of prohibiting motorized use on the Cook and Green Trail (#959) is analyzed in the DSEIS as part of Alternative 4 (DSEIS page II-36). However, the 20 stream crossings associated with the Cook and Green Trail are part of the current condition, and since the trail would remain on the land and receive non-motorized use, closure to motorized use would not be expected to have a detectable impact on water quality (DSEIS page III-23). Elimination of motorized use would have no effect to coho salmon critical habitat as it is located upstream of Applegate Dam, a permanent barrier to coho salmon and other anadromous fish species (DSEIS page III-157). Also, as stated in the DSEIS, since no resource damage from OHV use is currently occurring at possible locations along the Cook and Green Trail, any potential adverse effects are too speculative to quantify (DSEIS page III-29). See the effects discussions described in DSEIS Chapter III for the various affected resources, in particular: impacts to water quality and erosion (page III-23), botanical resources (page III-29), motorized opportunities (page III-43 to III-49), and fisheries and aquatic species (page III-157).

<u>Comment #112:</u> Road 3313-110 hydrology/ACS/sediment with 30 crossings not adequately analyzed (3403)

The agency designates Road 3318310 for mixed use anticipating that "[a]s the road and associated drainage features would degrade due to minor rutting associated with motorized trail use, sediment and runoff are likely to increase over the long term." (DEIS page III-11). Predictably this language was excised from the new DSEIS. Nevertheless, the action threatens a serious violation of the ACS because "[g]enerated sediment could easily reach Lawson Creek from the 30 channel crossings, or through the new rills and gullies generated by road use and uncontrolled drainage". (DS-016, page 47)

Response:
40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. The option of converting Road 3313110 (currently designated as Maintenance Level 1) to a motorized trail is considered as part of Alternative 3 in the DSEIS (DSEIS page II-27). The DSEIS analyzes the impacts of this action to a variety of resources, including: water quality, motorized opportunities, soils – site

productivity, air quality – dust and asbestos, and fisheries and aquatic species (DSEIS pages III-19, III-41, III-47, III-65, III-84, and III-145).

CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." As stated in the DSEIS, comments to the DEIS suggested that the Lawson Creek Road 3318310 remain open to ATV Class I and Motorcycle Class III use. In addition, a connection of Road 3318310 with Road 3318 (Wildhorse Road) was suggested to create a loop access. This opportunity was not identified or considered during Travel Analysis process because it would not maintain existing uses consistent with the Travel Management Plan's *Purpose and Need* and was therefore eliminated from detailed study with this process. This connection remains as a future opportunity for consideration, outside of this process (DSEIS, page II-61).

Significant Issue – Botanical Areas

Comment #113: Motorized use in Red Flat BA is not discussed (3500)

While the agency acknowledges that "prohibiting motorized use [in this Botanical Area] would help protect unusual and sensitive plants indigenous to southwest Oregon" the DSEIS contains no analysis, discussion or rationale to support ORV use on the Red Flat Trail as proposed in the preferred alternative. (DS-016, page 24)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." 40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects.

The Forest Service assumes the "Red Flat Trail" that the comment refers to is the trail (old road) that begins on FS Road 1703 in Section 19 and goes northwest down to the Hunter Creek Road (FS Road 3680) near the Forest boundary. This trail currently exists as a permitted motorized trail under Alternative 1, No Action. This trail continues to be a permitted motorized trail under DSEIS Alternatives 2, 3, and 5.

Under Alternative 4, this motorized trail would become a non-motorized trail. Text on DSEIS page III-95 states that "Alternative 4 provides indirect protection for FS Sensitive species [across the Forest] … by reducing the likelihood that OHVs would be in the vicinity of sensitive species occurrences with operators that are tempted to illegally leave roads and trails, potentially damaging plants and habitat. The additional trails excluded under Alternative 4 to motorized use in serpentine areas, the Boundary Trail, and Botanical Areas, often have Forest Service sensitive species occurrence and habitat which could be accessed and damaged by OHVs if their operators are inclined to leave the trails". The Forest Service knows of no rare plants along the Red Flat Trail. The habitat through which this trail passes appears in aerial photographs to be unlikely to support rare plant populations. So it is unlikely that any rare plants would benefit from this trail being non-motorized rather than motorized.

DSEIS page III-28 discusses effects of the alternatives on botanical areas. It refers in general terms to "the enhanced recreation experience" that some botanical area visitors may experience under Alternatives 3 and 5 if trails in botanical areas are non-motorized (vs. motorized). It refers in general terms to additional trails in additional botanical areas that would become non-motorized under Alternative 4, thereby acquiring the same enhanced recreation experience. The Red Flat Trail is one of these.

The Forest Service knows of no adverse effects to the Hunter Creek Bog (on adjacent BLM land) caused by motorized use of the Red Flat Trail. Protection of the hydrologic conditions favorable to rare plants in Hunter Creek Bog are the primary reason this 53-acre Botanical Area in the headwaters of the bog's watershed was designated in the Siskiyou NF LRMP.

Other Issue – Federally Listed and FS Sensitive Plants

Comment #114: ***Camissonia gracilifolia* found directly along Mule Mountain Trail (not analyzed) (3800)**

A Forest Service sensitive species *Camissonia gracilifolia* is found directly adjacent to the Mule Mountain Trail and could potentially be impacted by OHV use. The species is found within feet of the trail and it population is centered within a five mile radius of Mule Mountain according to the Upper Applegate Road NEPA. No analysis or disclosure of this species was addressed in the DSEIS. (DS-007, page 21)

Response:
40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. DSEIS pages III-94 through 97 address effects of the alternatives on Forest Service Sensitive vascular plants, bryophytes, lichens, and fungi and also on Survey and Manage vascular plants, bryophytes, lichens, and fungi. The Mule Mountain Trail is currently a permitted motorized trail under Alternative 1, No Action. This trail continues to be a permitted motorized trail under Alternatives 2, 3, and 5. Under Alternative 4 this motorized trail would become a non-motorized trail.

Text on DSEIS page III-94 states that "There is little difference in the level of disturbance to the trailside flora caused by humans, pack or saddle stock, wildlife, or wheeled vehicles, as long as the OHV tread width is less than the tread width of the trail, and vehicles truly stay on the trails. Therefore, although the alternatives differ in the number and location of motorized vs. non-motorized trails, there is little difference among the alternatives in the degree of effect this activity has on FS sensitive vascular plants, bryophytes, lichens, and fungi."

Text on DSEIS page III-95 states that "Alternative 4 provides indirect protection for FS Sensitive species [across the Forest] … by reducing the likelihood that OHVs would be in the vicinity of sensitive species occurrences with operators that are tempted to illegally leave roads and trails, potentially damaging plants and habitat. The additional trails closed under Alternative 4 to motorized use in serpentine areas, the Boundary trail, and Botanical Areas, often have Forest Service Sensitive species occurrence and habitat which could be accessed and damaged by OHVs if their operators are inclined to leave the trails".

The above general effects statements are applicable and accurate for most rare plant occurrences along most trails, including for the *Camissonia* along the Mule Mountain Trail. The DSEIS makes no effort to specifically describe effects of the alternatives on every FS sensitive plant population that exists along each trail, unless the general effects statements are not applicable and accurate.

Comment #115: ***Cypripedium monatnum* and other sensitive plants found near to Cook and Green trail; not analyzed (3801)**

***Cypripedium monatnum, Cypripedium californica, and Cypripedium fasciculatum* can all be found within feet of the Cook and Green Trail in sections 5 and 32. Impacts to these sensitive species have not been disclosed or analyzed in the NEPA process (DSEIS). (DS-007, page 29)**

Response:
40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. DSEIS pages III-94 through 97 address effects of the alternatives on Forest Service Sensitive vascular plants, bryophytes, lichens, and fungi and also on Survey and Manage vascular plants, bryophytes, lichens, and fungi.

Text on DSEIS page III-26 states "The Rogue River NF LRMP confines vehicle use in Botanical Areas to roads only; motorized use of trails in Botanical Areas is not allowed. However, no Forest Order has ever been issued to prohibit this use in all Botanical Areas covered by the RRNF LRMP. Consequently, some trails within these Botanical Areas are used by OHVs, specifically the Boundary Trail, the O'Brien Creek Trail, and the Cook and Green Trail". The Cook and Green Trail is considered a permitted motorized trail under Alternative 1, No Action. This trail continues to be a permitted motorized trail under Alternatives 2, 3, and 5. Under Alternative 4, this motorized trail would become a non-motorized trail.

Text on DSEIS page III-94 states that "There is little difference in the level of disturbance to the trailside flora caused by humans, pack or saddle stock, wildlife, or wheeled vehicles, as long as the OHV tread width is less than the tread width of the trail, and vehicles truly stay on the trails. Therefore, although the alternatives differ in the number and location of motorized vs. non-motorized trails, there is little difference among the alternatives in the degree of effect this activity has on FS sensitive vascular plants, bryophytes, lichens, and fungi."

Text on DSEIS page III-95 states that "Alternative 4 provides indirect protection for FS Sensitive species [across the Forest] … by reducing the likelihood that OHVs would be in the vicinity of sensitive species occurrences with operators that are tempted to illegally leave roads and trails, potentially damaging plants and habitat. The additional trails closed under Alternative 4 to motorized use in serpentine areas, the Boundary trail, and Botanical Areas, often have Forest Service Sensitive species occurrence and habitat which could be accessed and damaged by OHVs if their operators are inclined to leave the trails".

The above general effects statements are applicable and accurate for most rare plant occurrences along most trails. In this case, the Forest Service has prior knowledge of the *Cypripedium fasciculatum* and *Cypripedium montanum* occurrences along this trail, and considers the above general statements to be accurate for these occurrences, with the caveat that there are few areas along the Cook and Green Trail that are likely to be tempting for OHV users to go off-trail, because of the generally dense vegetation and rocky, steep slopes.

Cypripedium californicum is not a Forest Service Sensitive species. The DSEIS does not analyze effects to botanical species which have no status as Federally-listed species, Forest Service Sensitive species, or Survey and Manage species unless there are actions proposed under one or more Action Alternatives which pose a threat to the viability of those species. The Forest Service is not aware of any *Cypripedium californicum* along the Cook and Green Trail but the trail is within ½ mile of a large population in the Cook and Green Botanical Area. This orchid may indeed be present in a trailside wet area. In the absence of any specific site information or any known threat caused by trail users, the Forest Service assumes the general effects statements would be true for *Cypripedium californicum,* if it is present along the Cook and Green Trail.

Comment #116: *Chiloscyphus gemmiparus* alpine liverwort inventoried at Hinkle Lake should be protected (3802)

In the summer of 2010, surveys were conducted at Hinkle Lake as part of the "Inventory of rare bryophytes in unique wetland ecosystems on the Rogue River-Siskiyou National Forest" By Scott Loring and Clint Emerson. It was published through the Interagency Special Status and Sensitive Species Program in 2010. The report documents *Chiloscyphus gemmiparus* (alpine liverwort) just below the OHV tracks at Hinkle Lake. Being one of only six documented populations worldwide, the Alpine Liverwort in the Hinkle Lake basin should be aggressively protected from OHVs. (DS-007, page 34)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." 40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects.

The off-road/off-trail OHV and 4X4 damage in the wet meadows around Hinkle Lake is a result of current illegal activity; this activity could continue to be illegal under all alternatives. The Forest Service has closed the access road leading to the Hinkle Lake basin, repeatedly placing gates and berms across it to try to prevent the illegal vehicle access, in the hopes that the off-trail/off-road damage will end or be reduced. These aggressive protection efforts would continue regardless of this process and under all alternatives for travel management.

<u>Comment #117:</u> McDonalds rockcress along McGrew Trail not adequately analyzed (3803)

According to the DSEIS, cross country travel in the McGrew/ Sourdough region OHV use has already impacted ESA listed McDonald's rock cress, and has the potential to impact other "McDonald's rock cress plants that are present". Damage to this ESA species would surely be considered a "considerable adverse effect". (DS-007, page 40; DS-036, page 11)

Response:
40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects. The text on DSEIS page III-93 states "One area where off-road use has caused damage to McDonald's rockcress plants in the past, is nearby on Six Rivers National Forest at Sourdough Junction. The McGrew Road (4402450) coming from Oregon terminates here. There have been repeated instances of vehicles driving off-road at this location, potentially damaging McDonald's rockcress plants that are present. The McGrew Road would be closed under Alternative 4. However, since better and more frequently traveled roads also converge at Sourdough Junction, the closure of the McGrew Road under Alternative 4 may have no effect on the frequency with which MacDonald's rockcress plants are damaged by illegal off-road/off-trail use of motorized vehicles".

Other pertinent McDonald's rockcress DSEIS text is on pages III-90, 92, and the top of page III-93. The Forest Service considers the effects of the alternatives on McDonald's rockcress as a Federally-listed species to be adequately analyzed.

In December 2012, the US Fish and Wildlife Service decided that their Endangered Species Act listing of McDonald's rockcress will apply only in Mendocino County, California. This is where they designated critical habitat on Mendocino County's Red Mountain, the location from which this taxon was first collected and described. From this point forward, *Arabis macdonaldiana* in Del Norte, Siskiyou, and Curry County, will be considered a FS Sensitive species, not a Federally-listed species.

<u>Comment #118:</u> Surveys not conducted for McDonalds rockcress on Biscuit Hill Road (3804)

The Forest Service has neglected to survey the Maintenance Level 1 Biscuit Hill Road (4402-494) for McDonald's rockcress. (DS-016, page 67)

Response:
A DSEIS mitigation measure common to all Action Alternatives on page II-52 states: "If conversion of ML1 Road 4402494 (Cedar Springs to Biscuit Hill) requires actual construction or ground disturbance beyond the first 100 meters, conduct botanical field reconnaissance in the spring or early summer for *Arabis macdonaldiana,* FS Sensitive plants, and Survey and Manage (S&M) Category A and C species along the proposed route before project is implemented. If *Arabis macdonaldiana* is found, re-route or re-design to avoid individuals. If FS Sensitive plants or S&M species are found, re-route or re-design if needed to maintain viability of local population, but no need to avoid every individual."

<u>Comment #119:</u> Sensitive plant species in Signal Buttes area were not analyzed (3805)

See specific Signal Buttes area sites as described in Forest Service Report: "Conservation Assessment for Gasquet Manzanita (*Arctostaphylos hispidula*) Within the State of Oregon." Other sensitive plant species known to occur in this area that could be likely impacted by increased ATV use include: *Mondardella purpurea*; *Carex scabriuscula* (C. gigas) Siskiyou Sedge; and *Poa piperi*. (DS-016, page 85)

Response:
This comment is similar to Comment #52 (see Response). In addition, the *Monardella* and the *Poa* are no longer Forest Service Sensitive species. The Forest Service has no record of *Monardella purpurea* in the Signal Buttes area. The effect of Alternatives 3 and 5 on *Poa piperi* in the Signal Buttes area is expected to the same as described for *Carex gigas* and *Arctostaphylos hispidula* in the DSEIS text and for *Erigeron stanselliae* in the Response to Comment #52. The rationale for this conclusion is the same. Effects of Alternatives 3 and 5 on *Monardella purpurea* occurrences in the Signal Buttes area would be the same as for the other species discussed.

Other Issue – Invasive Non-native Plants

<u>Comment #120:</u> Current condition: alyssum infestation exists along Road 4402; threat of spread (3900)

Regarding noxious weeds, it should be pointed out that an Alyssum infestation is already present along the side road 4402 just past the end of pavement of Lone Mountain Road. This presents a threat that Alyssum could be transferred deep into the forest and into California. (DS-006, page 1)

Response:
The Forest Service knows of this infestation and is actively treating it. The comment is correct that it presents a threat to serpentine landscapes farther out from this road system. Effects of the alternatives on the potential for spread of invasive non-native plants are described on DSEIS pages III-97 through III-100. The Alyssums are specifically discussed on DSEIS pagesIII-98 and III-99.

<u>Comment #121:</u> Impacts from star thistle, bull thistle and non-native grass not analyzed (Mule Mountain IRA) (3901)

The entire Mule Mountain IRA has locally and regionally exceptional botanical resources, especially non-forest plant communities and native grasslands. These areas are extremely susceptible to noxious weed spread. The threat of star thistle, bull thistle, and non-native annual grasses is a very real one. This threat could easily spread into the IRA and BA. These impacts were not adequately analyzed in the DSEIS. (DS-007, page 21)

Response:
The comment is correct that the non-forest plant communities and native grasslands in the Mule Mountain IRA are susceptible to the spread of these species and indeed it is already happening to some degree. Effects of the alternatives on the potential for spread of invasive non-native plants into all areas of the Forest are described on DSEIS pages III-97 through III-100. These same potential effects are applicable to the Mule Mountain IRA.

Other Issue – Invasive Pathogens

Comment #122: Finality statement regarding *Phytophthora lateralis* (PL) is unsubstantiated (4000)

The (2009 FEIS RTC) claims to doubt the finality of PL infestation and thus the need to analyze impacts. This statement is unsubstantiated and unjustifiable given the large amounts of peer reviewed science documenting the severity and finality of PL infestation. (DS-007, page 16)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

The DSEIS notes while there may be some variability in the "risk" of pathogen spread by alternative, there are no predictable direct effects that vary by alternative. Further, Alternatives 3 and 4 would predict a reduced potential risk over the current conditions (Alternatives 1 and 2). This degree of risk did not elevate this issue to a "significant issue" status and "invasive pathogens" was not used as a specific element of an alternative theme.

The question of finality of infestation of *Phytophthora lateralis* (PL) is an open one. However as stated at DSEIS III-101, PL does not threaten POC with extirpation. Considerable areas within the range of POC are on low-risk sites or in drainages that presently remain uninfested. There is little spread of PL on low-risk sites even when the pathogen is already established nearby. Low risk sites are defined as streamside POC greater than 100 feet from a road and non-stream side POC greater than 50 feet from a road. For the purposes of this analysis, probability of spread and establishment of PL into new uninfested areas is below 6.1%; this is considered low risk. Probability figures are based on literature and professional judgment of forest pathologists with substantial amounts of experience evaluating PL in the laboratory and in the field.

The Invasive Pathogens Issue and the Port-Orford-cedar and *Phytophthora lateralis* discussion was supplemented in the DSEIS beginning at page III-100.

Comment #123: Disclosure of PL impacts is limited by analyzing only changes for motorized use for all routes and trails (4001)

True disclosure of PL impacts has been limited by the agency's decision to apply the POC Risk Key only to "changes" in the system of motorized use on the Forest. (DS-007, page 16, 39; DS-016, page 36)

Response:
Disclosure of infected and uninfected POC stands across the Forest was provided in the 2004 analysis for USDA Forest Service and USDI Bureau of Land Management, Final Supplemental Environmental Impact Statement – Management of Port-Orford-Cedar in Southwest Oregon.

The Forest follows current management direction in the form of the Forest Plan Amendment resulting from the ROD for Management of Port-Orford-Cedar in Southwest Oregon, which requires the use of the Risk Key. The Port-Orford Cedar Risk Key is a site-specific analysis tool to help determine where risk reduction management practices would be applied. Only those roads or trails that trigger the POC Risk Key (because there is a proposed change in motorized use from the current condition) were analyzed.

As noted in the DSEIS and in the introduction to this Appendix, consideration of the consequences of current uses was a part of the Travel Analysis step of this process (originally analyzed in 2008 with updates throughout this process). Many of these conditions provided the basis for changes proposed as part of the alternatives considered in detail in the 2009 DEIS and FEIS. This step of the process and its analysis under NEPA has focused on the change from the current situation. A tightly focused process was enacted; this includes focused site-specific proposals that do not aim to solve all travel management issues at once.

<u>Comment #124:</u> Disclosure of infected and uninfected stands across forest was not provided in analysis (4002)

Public comments asked for disclosure of infected and uninfected stands across the forest, this has never been made public, amounting to failure to disclose significant impacts. Many roads and trails within uninfected watersheds are currently open by default and are proposed for OHV use. (DS-007, page 16)

Response:
Disclosure of infected and uninfected POC stands across the Forest was provided in the 2004 analysis for USDA Forest Service and USDI Bureau of Land Management, Final Supplemental Environmental Impact Statement – Management of Port-Orford-Cedar in Southwest Oregon. As discussed in the DSEIS page III-101, on the Rogue River–Siskiyou National Forest, current inventory data shows POC occurs on approximately 133,000 acres on the Gold Beach, Powers, and Wild Rivers Ranger Districts. About 12,700 acres (8.7%) are infested with *Phytophthora lateralis*, the pathogen that causes POC root disease. More detailed information on these inventories is available on request and this comment is largely out of the scope of the Travel Management process.

<u>Comment #125:</u> Reliance on POC risk key and 2004 decision is inadequate and not supported by POC experts Jules and Kauffman (4003)

Reliance upon the Risk Key as described in the 2003 Range Wide Assessment of Port Orford Cedar on Federal Lands is inadequate as described below by Port Orford cedar experts Jules and Kauffman (2004). The DSEIS simply ignores the content of Professor Jules' March 4, 2010 letter to (then) Regional Forester Mary Wagner expressing concern regarding the extensive reliance on the POC Risk Key in this planning effort. (DS-016, page 16, 36)

Response:
The Forest is aware of Professor Jules 2010 input to the Travel Management process. While his concern is duly noted, the Forest is obligated to follow current management direction in the form of the Forest Plan Amendment resulting from the ROD for Management of Port-Orford-Cedar in Southwest Oregon, which requires the use of the Risk Key.

The Port-Orford Cedar Risk Key is a site-specific analysis tool to help determine where risk reduction management practices would be applied. Only those roads or trails that trigger the POC Risk Key (because there is a proposed change in motorized use from the current condition) were analyzed. The Risk Key analysis and a more complete list of tables highlighting those proposed road and trail changes were documented in Appendix F of the DSEIS.

Other Issue – Terrestrial Wildlife Listed Species: Northern Spotted Owl

<u>Comment #126:</u> Document failed to disclose owl cores in relation to motorized use; seasonal closures not mentioned (4200)

Currently, the DSEIS shows no mention of seasonal trail closures within known spotted owl habitat, especially within owl cores, and nesting sites during the "critical nesting period" between March 1 and June 30. The DSEIS failed to disclose owl cores and nesting sites in relation to OHV trails, thus the issue was not adequately analyzed through the NEPA process. (DS-007, page 17; DS-016, page 35)

Response:
Spotted owl restrictions on motorized trail use were disclosed in the DSEIS at page II-49, Table II-10:

> "Work activities that produce loud noises above ambient levels will not occur within specified distances of any documented or generated owl site (Table II-10) during the critical early nesting period, March 1 and June 30, or until two weeks after the fledging period. This seasonal restriction may be waived if protocol surveys have determined the activity center is not occupied, owls are non-nesting, or owls failed in their nesting attempt."

Table II-10. Spotted Owl Restriction Distances

Activity	Zone of Restricted Activity
Heavy Equipment (including non-blasting quarry operations)	105 feet (35 yards)
Chain saws	195 feet (60 yards)
Motorized vehicle use	195 feet (60 yards)
Impact pile driver, jackhammer, rock drill	195 feet (60 yards)
Small helicopter or plane	360 feet (120 yards)
Type 1 or Type 2 helicopter	0.25 miles*
Blasting; 2 pounds of explosive or less	360 feet (120 yards)
Blasting; more than 2 pounds of explosives	1 mile

* If less than 1,500 feet above ground level.

Disclosure of the locations of specific spotted owl core areas are not usually provided in NEPA documents for species protection from deliberate human disturbance. See the northern spotted owl effects discussion in DSEIS Chapter III, pages III-114 to III-129. Discussion on spotted owl restrictions will be clarified in the FSEIS.

<u>Comment #127:</u> Owls may not be habituated to motorized disturbance when routes are currently impassible (4201)

The public submitted timely and substantive comments indicating that the Forest Service assumption that spotted owls located near to proposed motorized trails are habituated to noise disturbance is in error. A number of proposed ORV trails currently receive very little use and no maintenance and are currently impassible to motorized travel. Hence nearby owls may not be habituated to motorized disturbance. (DS-016, page 35)

The Forest Service assumes that the proposed motorized use activities are "not likely to adversely affect" spotted owls due to habituation, yet no evidence such as use records detailing trail use have been made public to validate such a claim. Specifically, the impact and effects of increased and new motorized use to "un-habituated" spotted owls and goshawks along FS Road 1060-500 was not analyzed. (DS-007, page 18, 43)

Response:
As stated in the DSEIS (pages III-119 to III-120) the US Fish and Wildlife Service has analyzed the available data on spotted owls, murrelets, and other species and has consulted species experts who have worked extensively with spotted owls to determine the extent to which above-ambient noises affect spotted owls. The results of this analysis helped develop a table specifying the harassment distances at which spotted owls may flush or abort a feeding attempt for various types of activities (see Table III-8 of the DSEIS on page III-119). This data has been used by the US Fish and Wildlife Service is based on the best available science and is used by the Service in biological opinions. See Response to Comment #126 regarding seasonal spotted owl restriction distances.

DSEIS pages III-117 thru III-119 discuss the effects mechanisms for disturbance from motorized vehicle use of roads and trails for various wildlife species. Almost all routes that are being considered for designation within the Action Alternatives currently exist and have varying degrees of use (Alternative 3 and 5 are the exception). Further, it is assumed that because of this use, regardless of which alternative is selected, overall detrimental effects to terrestrial wildlife habitat and populations from the motorized route network would either be reduced or maintained when compared to the current condition (DSEIS page III-129).

Effects to spotted owls due to disturbance under **Alternatives 3 (Proposed Action) and 5** would result in a **"may effect, not likely to adversely affect (NLAA)"** determination due to the proposed trail construction/reconstruction and conversion of Maintenance Level 1 roads to motorized trails under this alternative (DSEIS pages III-121 to III-122). Effects to spotted owls due to disturbance under **Alternatives 1, 2, and 4** would result in a **no effect (NE)** determination for disturbance or habitat modification based on the fact that no new trail construction/reconstruction would occur and no Maintenance Level 1 roads would be converted to motorized trails. There would be no change in the amount of use that existing roads and trail receive, with the exception of DSEIS Alternative 4, where motorized use that currently exists on approximately 114 miles of trail would be prohibited. Discussion on effects to spotted owls will be clarified in the FSEIS.

The RRNF LRMP requires seasonal protection to goshawk nest sites (e.g., LRMP page IV-238). There are no known nest sites for goshawk associated with any routes being considered for motorized use across the Forest or in proximity of Road 1060-500. This will be clarified in the FSEIS.

<u>Comment #128:</u> Disturbance on owl sites within 100 yards of nest site not disclosed; e.g., Mule Creek Trail (4202)

Of special concern are routes where OHV use comes within 100 yards of a nest site. The 100 yard threshold for noise disturbance from OHVs and chainsaws is compounded on some sites by the small area in which suitable habitat exists. The Mule Creek Trail is one such trail, where owl sites are found in a narrow corridor along Mule Creek. Given the limited habitat distribution OHV use on this trail will most definitely occur within 100 yards of nest sites and suitable habitat in which the owl can disperse is non-existent. These impacts have not been adequately disclosed or analyzed. (DS-007, page 18)

Response:
As seen in Table II-10 (DSEIS page II-49), the zone of restricted activity for motorized vehicle use is 60 yards, not 100 yards. This would apply during the "critical nesting period", which is March 1 – June 30 in Oregon (DSEIS page III-120). See Response to Comment #126 regarding seasonal spotted owl restriction distances and Comment #127 regarding disturbance impacts to northern spotted owls.

Other Issue – Management Indicator Species

<u>Comment #129:</u> Motorized use analysis regarding route use, road density for big game not analyzed (4300)

Motorized trails, especially high density systems such as the Mule Mountain system could easily be seen as a conflict with BGWR values and should be seen as an increase in open road density. The Forest Service has yet to demonstrate that OHV use does not create biological stress and/or conflicts with wildlife values. It has also failed to analyze the impact of increased vehicle access, route density, and the increased impact of hunting stress both legal and illegal. (DS-007, page 10)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." 40 CFR 1502.16 requires agencies to take a "hard look" at direct, indirect, and cumulative effects.

Impacts to big game, in particular black-tailed deer and Roosevelt elk (RRNF LRMP Management Indicator Species), are discussed in the DSEIS (pages III-129 to III-135). The Forest recognizes and discusses the impacts of road density on big game.

Under all alternatives, there would be no change to existing levels of road density across the affected watersheds. Under Alternative 1 there would be no change over current conditions. Under the Action Alternatives, harassment potential would be decreased due to the reduced potential for noise and human activities through the elimination of cross country travel and the overall reduction in the amount of roads open to the public. In addition, Alternatives 3 and 4 would reduce the miles of trails open to motorized vehicles.

Since the Mule Mountain Trail falls within the Big Game Winter Range land allocation, the agency would employ seasonal restrictions to reduce impacts to big game as the need is identified. Due to either no change or an overall reduction in the potential for disturbance under all alternatives, proposed actions would not contribute to an adverse trend in viability to deer and elk on the Rogue River-Siskiyou National Forest (DSEIS page III-133).

Other Issue – Sensitive Wildlife Species

<u>Comment #130:</u> Mardon skipper was located in area of Signal Buttes (4400)

During the 2010 summer season, Entomologist/Lepidopterist Dana Ross reported finding a single male Mardon skipper, *Polites mardon*, on the USFS lands near Signal Buttes in a very wet portion of area serpentine meadows. Was this considered? (DS-010, page 9)

Response:
The Forest Service completed a Biological Evaluation (documented in the DSEIS as Other Issue 9: Terrestrial Wildlife Listed Species). DSEIS Appendix C includes sections on species accounts; see pages C-20 to C-21 for the Mardon skipper species account. A summary of findings regarding the Mardon skipper was included in the DSEIS on pages III-116 to III-129.

As stated in the DSEIS (pages III-124 to III-127), based on known or suspected species occurrence or suitable habitat, the Mardon skipper was analyzed and determined to potentially incur effects. Under Alternatives 1, 2, 4, and 5, there is no trail construction proposed within any meadow. For these alternatives, there is a determination of "no impact" to Mardon skipper.

Under Alternative 3 (Proposed Action), the construction/reconstruction of 0.5 miles of trail through potential habitat on the Gold Beach Ranger District (in the Signal Buttes area) would affect some meadow habitat for this species. Therefore, a "may impact individuals, but not likely to result in a loss of viability on the planning area, nor cause a trend to federal listing or a loss of species viability range wide" determination (MIIH) was made. The DSEIS also includes the recommendation that an additional survey of this site be conducted prior to any reconstruction. Discussion on effects to Mardon skipper will be clarified in the FSEIS.

<u>Comment #131:</u> DSEIS fails to disclose effects and if surveys were conducted for Siskiyou Mountain salamander (4401)

Page III-126 of the DSEIS indicates that "Alternatives 3 and 5 construct/reconstruct 1.2 miles of motorized trail through potential habitat [for Siskiyou Mountain Salamanders] on the Siskiyou Mountains Ranger District impacting 1 acre of habitat." However, the DSEIS never discloses if the habitat was surveyed or the potential impacts of the proposed action on either the salamanders or their habitat. (DS-016, page 67)

Response:
The Forest Service completed a Biological Evaluation (documented in the DSEIS as Other Issue 9: Terrestrial Wildlife Listed Species). DSEIS Appendix C includes sections on species accounts; see page C-19 for the Siskiyou Mountains salamander species account. A summary of findings regarding the Siskiyou Mountains salamander is included in the DSEIS on pages III-116 to III-129.

As stated in the DSEIS (page III-126), based on known or suspected species occurrence or suitable habitat the Siskiyou Mountains salamander was analyzed and determined to potentially incur effects. Under Alternatives 1, 2, and 4, there is no trail construction or conversion of Maintenance Level 1 roads to motorized trails proposed. For these alternatives, there is a determination of "no impact" to the Siskiyou Mountains salamander.

Under Alternatives 3 (Proposed Action) and 5, the construction/reconstruction of 1.2 miles of trail through potential habitat on the Siskiyou Mountains Ranger District would affect approximately 1 acre of habitat for this species. In addition, there is a potential for direct mortality on individuals of these species from crushing by OHVs on both the new trail construction/reconstruction and where Maintenance Level 1 roads are converted to motorized trails on the Gold Beach Ranger District. Therefore, a "may impact individuals, but not likely to result in a loss of viability on the planning area, nor cause a trend to federal listing or a loss of species viability range wide" determination (MIIH) was made. The DSEIS includes the recommendation that an additional survey of this site be conducted prior to any reconstruction.

Other Issue – Sound Level

Comment #132: DSEIS lacks a thorough analysis of motorized noise; there should be analysis for each trail in IRA, BCNMAs, Wilderness, etc. (4500)

There should be a noise disturbance analysis for each trail that borders or enters Inventoried Roadless Areas, Backcountry Non-motorized Areas, or Wilderness Areas. The Boundary Trail, specifically, should have noise disturbance analysis that shows the distance that the noise disturbance would travel if approved for motorized use. (DS-030, page 1)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

See Response to Comments #47, #74, and #101. The Forest Service did not conduct noise disturbance analysis because noise is regulated by State of Oregon Standards (see Sound Level issue in DSEIS Chapter III pages III-162 to III-167) on public lands. While the Forest Service has the authority to enforce noise standards set by other Federal (typically EPA or OSHA) agencies and by the state under 36 CFR 261.13, accurate field-testing of noise from OHVs has been problematic for many enforcement entities. The agency also has the authority to set specific limitations through special order 36 CFR 261.55 (j). While field-testing equipment is available, ambient noise can create erroneous readings, as can other environmental factors. Field tests have been successfully challenged in court, limiting the effectiveness of this analytical tool.

Other Issue - Enforcement

Comment #133: Horse Camp Trail ends near Red Buttes Wilderness, increased potential loop and OHV trespass not analyzed (4700)

Horse Camp Trail ends near Red Buttes Wilderness; increased potential loop use associated with the Boundary Trail will encourage subsequent violations of the law by facilitating wilderness trespass. This impact was not addressed in the DSEIS. (DS-007, page 26)

Response:
See Response to Comment #61. This process cannot analyze or predict illegal activities. A certain amount of illegal activities are likely to continue under any scenario for motorized use, however, the goal of this process is to enact a system that would help to curtail illegal use, and provide a mechanism to allow enforcement citations for any illegal use.

This comment is referring to a speculation that illegal use would occur. Decisions concerning route designation through this travel management process are unrelated to effects from the above-described illegal situation. Wholly illegal acts are neither reasonably foreseeable events capable of NEPA analysis, nor germane to agency decisions implementing regulatory direction. Therefore, the Travel Management process does not include an analysis of illegal damage due to the remote and speculative nature of illegal activities.

<u>Comment #134:</u> Elk Creek Trail connects to designated spur that accesses Bigelow Lakes BA and Oregon Caves; not analyzed (4701)

Motorized use on the Elk Creek Trail will increase user conflicts both within and outside of the Grayback BCNMA. Allowing motorized use in this area will encourage subsequent violations of the law, by facilitating use of non-designated routes and trails. (DS-007, page 27)

Response:
See Response to Comment #35, #58, #61 and #133.

<u>Comment #135:</u> Silver Peak/Hobson Horn Trail; Kalmiopsis Wilderness, potential OHV trespass not analyzed (4702)

Allowing OHV use on the Illinois River Trail, Nanny Creek Trail, Hobson Horn/Silver Peak Trail will increase and exacerbate the problem of vehicle trespass within the Wilderness Area, encourage subsequent violations of the law, creating user conflict and impacts to Wilderness values. This impact has not been disclosed or analyzed in the DSEIS. (DS-007, page 37)

Response:
See Response to Comment #35, #58, #61 and #133.

<u>Comment #136:</u> DSEIS does not respond or disclose the efficacy of the agency's enforcement strategy nor address studies submitted (4703)

In the DSEIS, the agency continues to refuse to meaningfully analyze or respond to the voluminous amount of information provided during the previous commenting period by our organizations regarding the need to analyze and disclose the efficacy of the agency's enforcement strategy (e.g., Monaghan 2001, and Gregory 2008). (DS-016, page 20, 28, 63)

Response:
The suggested studies as well as others regarding enforcement were reviewed and utilized in the preparation of the DSEIS; as well as the 2009 FEIS. There is no requirement to address individual studies per se, especially when they have already been considered. The efficacy of the agency's enforcement strategy was documented at DSEIS Chapter III; notably Enforcement, beginning at page III-167.

The Monaghan paper was published by Lisa Frueh and her colleagues, who examined existing data regarding OHV use and conducted original opinion and behavioral research. Based on this, a coalition of OHV representatives, environmental leaders and public officials initiated a pilot project to motivate OHV users in Colorado to voluntarily adopt safe and environmentally conscientious riding practices (responsible riding).

This effort is interesting and useful, but not directly pertinent to the Travel Management process on the RRSNF. Travel Management is not about establishing behavior changes; it is about a federal agency implementing Subpart B of the 2005 Travel Rule. Compliance and enforcement procedures are established by this rule.

The Forest was also aware of the testimony of Jack Gregory, retired Special Agent for the Forest Service Southern Region, before the Subcommittee on National Parks, Forests, and Public Lands, U.S. House of Representatives, on March 13, 2008. These opinions were largely about regulating ORV enforcement efforts. The main points of this testimonial were to establish penalties that deter illegal use, properly fund ORV enforcement, and end the hidden costs to taxpayers. These points are all out of the scope of the Travel Management process for the RRSNF; they are national in scope and largely associated with congressional authority.

<u>Comment #137:</u> Forest is not using the 'three E strategy'; engineering is not being done e. g., closing roads (4704)

The "three Es" stand for engineering, education and enforcement. A key provision of this enforcement strategy is to "physically close and rehabilitate decommissioned roads and trails." Yet this planning process "is not a proposal to physically close (or decommission) any roads or trails." Hence the Forest Service is in fact not implementing the "three E" strategy. The "Engineering" law enforcement strategy of closing and decommissioning roads and trails to prevent illegal use was not carried forward under any of the Action Alternatives. (DS-016, page 20)

Response:
As stated in the DSEIS, page III-172:

> "Trends in violations related to the Travel Management Rule can be analyzed and appropriate action(s) taken, if needed. Appropriate action(s) may involve one or more techniques or adaptive strategies. In the law enforcement community, this is often referred to as the **"three E strategy" of engineering, education, and enforcement**. With the change in the Travel Management Rule, it is anticipated that the law enforcement program would use a combination of strategies, especially during the first 5 years of the rule's implementation.
>
> The **engineering strategy** is designed to prevent or reduce inadvertent violations, resource damage, and crime vulnerability. The strategy's goal is to remove the opportunity to commit a violation. LEI personnel work with each Forest, particularly the recreation and engineering programs, to implement some or all of the following specific tactics:
>
> - Proper design of improvements and facilities.
> - Facility security measures such as installation of barricades, gates, and other natural obstacles.
> - Forest signing, both directional and informational will be considered at portal locations, to assist the public to ensure they stay on designated trails, and out of wilderness and other sensitive areas.
> - Physically close and rehabilitate decommissioned roads and trails (dependent on available funding)."

The engineering portion of this strategy would continue to be implemented partially with this Travel Management Process, as well as with other more site-specific projects, and as noted, dependent on available funding. The Forest has been accomplishing this by specific projects, project areas or by specific watersheds. Examples include the South Fork Coquille Restoration Plan and the Applegate McKee Legacy Roads project. Discussion on the engineering portion of the three E strategy will be clarified in the FSEIS.

<u>Comment #138:</u> Cook and Green Trail conflicts with Botanical Area, plants, and illegal use of PCT (4705)

The Forest Service received site-specific public comments regarding illegal motorized use of the Pacific Crest Trail (PCT) that originates from access provided by the Cook and Green Trail (which also illegally encourages ORV use through the Cook and Green Botanical Area). The facts are: (1) this trail is regularly and routinely used to facilitate illegal motorized use of the PCT; (2) this trail traverses through a Botanical Area in violation of the LRMP and puts rare plants at-risk to motorized damage. (DS-016, page38)

Response:
As stated in the DSEIS (page III-26), while the Rogue River NF LRMP does not allow motorized use of trails in Botanical Areas, no Forest Order has ever been issued to prohibit this use in all Botanical Areas covered by the RRNF LRMP. Consequently, some trails within these Botanical Areas are used by OHVs, including the Cook and Green Trail. Further off-trail use by OHVs would not have adverse effects on areas adjacent to the Cook and Green Trail, because surveys indicate there are no vulnerable special status plant populations along this trail and no real opportunities to get off the trail exist (DSEIS page III-29).

The option of prohibiting motorized use on the Cook and Green Trail is analyzed under Alternative 4. Under Alternatives 3 (Proposed Action) and 5, motorized use would be prohibited on 4 miles of the Horse Camp Trail (#958), which would lessen the likelihood of motorcyclists using the PCNST as part of a loop system that would connect with the Cook and Green Trail (DSEIS pages III-43 and III-48). See DSEIS pages III-167 to III-173 regarding enforcement of the MVUM.

Comment #139: Erosion and motorized impacts to meadows (Shasta Costa Trail) is an illegal use needing management (4706)

We recommend that motorized use on Shasta Costa Trail be prohibited due to ongoing damage to meadow areas and lack of mixed use at southern terminus of trail at Road 2308. In addition, the trail and off trail use exceeds slope standards for ATVs. (DS-016, page 88)

Response:
See Response to Comment #20 and #93. After review of the Rogue River-Siskiyou road and trails INFRA database, it has become apparent that errors were mistakenly incorporated into the baseline trail system for the Shasta Costa unnumbered trail. This route is now considered user-created route. User-created routes will not be included for consideration in this Travel Management effort.

Other Issue – Wild and Scenic Rivers

Comment #140: DSEIS does not address the ORVs; motorized use from Sourdough Camp (4800)

While [the DSEIS]analysis is a marked improvement over the complete lack of information in the previous NEPA documents, the DSEIS still neglects to address the significant ongoing damage to Outstanding Remarkable Values that is occurring from motorized use in the Wild and Scenic Corridor at Sourdough Camp. (DS-016, page 27)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." The DSEIS discusses Wild and Scenic Rivers under Other Issue 19 (beginning at DEIS page III-187). Under the North Fork Smith River section (DSEIS page III-189) it states:

> "The Wild section contains all 0.6 mile of motorized roads. Road 4402-206 extends 0.3 mile into the corridor, providing motorized access to Sourdough Camp. Sourdough is a semi-primitive campground acknowledged by the 1988 WSRA as an exception to the preclusion of motorized development in the Wild section. There are two short roads within Sourdough Camp that provide access to campsites and the North Fork Smith. These are 4402-256 and 4402-259A. Both comprise another 0.3 mile of motorized access in and around Sourdough Camp, with access to the river. Access on these motorized roads is restricted to the dry season (June 1 to September 30) to reduce the risk of introduction and spread of *Phytophthora lateralis*."

Alternative 4 in the DSEIS addresses concerns with existing use and this situation by closing all motorized use. The effect of this (described at DSEIS page III-193) is:" . . .Alternative 4 would require an additional plan amendment because this alternative proposes a change to the current Siskiyou NF LRMP and the North Fork Smith River Management Plan Standards and Guidelines. Since Alternative 4 closes all motorized use, Sourdough Camp would not be accessible by motorized users as a semi-primitive use area. While Alternative 4 would enhance certain ORVs it is not consistent with current plan direction because it would preclude motorized access to a semi-primitive motorized camp area." This situation will be clarified in the FSEIS.

<u>Comment #141:</u> DSEIS does not address sight and sounds of motorized use above the Illinois River (4801)

The proposed Siskiyou LRMP amendment is inconsistent with the Wild River designation. In general, Wild River corridors are managed to prohibit motorized use. The DSEIS fails to adequately describe the degraded experience of river users because of sight and sounds of motorcycles and ATVs operating on trails above the Illinois River. (DS-016, page 79)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

The DSEIS discusses Wild and Scenic Rivers under Other Issue 19 (and specifically for the Illinois River section, at DSEIS page III-189. Motorized use is allowed per the 1985 Wild and Scenic River Plan, Page B-21.

From DSEIS page 190:

> "It is not the purpose of this planning effort to decide whether wheeled motorized use within any of the Wild and Scenic River Areas (WSR) is appropriate. Those overarching decisions on allowable uses of wheeled motorized vehicles in WSRs were made in prior decision documents (LRMPs and River Management Plans) and are not being revisited here. As discussed above, WSRs will continue to be managed according to statutory laws, agency policy, LRMPs and the applicable River Management Plans.
>
> The scope of this analysis is limited to motorized road and trail changes within WSRs. Many listed ORV values are discussed in other sections of this document. Specific effects to those resources are analyzed in the site-specific evaluations of the environmental effects elsewhere in this document and resolved in alternatives or through mitigations on a site-specific case-by-case basis. "

From DSEIS page III-188:

> "In the Assumptions for Analysis at III-3, maintaining the current level of use does not constitute a measureable change to the current condition. Therefore, it does not constitute a new effect. Those river segments that will have measurable change because of a reduction or increase in motorized use are the Illinois and the North Fork of the Smith as identified in Table III-22…"

<u>Comment #142:</u> DSEIS (still) does not reflect W&SR maps of the eligible corridors provided (4802)

The eligibility map (attachment to DS-036) for Baldface Creek shows that a section of the McGrew Trail is in the eligible Wild River Area Taylor Creek, one of Baldface Creek's perennial Tributaries. We could find no mention or analysis of this in the DSEIS. (DS-036, page 8)

Response:
CEQ regulations (40 CFR 1501.2(c)) require an agency to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act."

The Forest Service is aware of the river corridor eligibility maps provided. The DSEIS discusses Eligible Rivers and consequences as part of Other Issue 19. Analyses of effects are discussed by alternative including Baldface Creek, at DSEIS page III-197 through III-201.

Other Effects

Comment #143: Proposals show no consideration for the disabled and elderly access (4900)

There are a good number of people (members of the public) who are not as ambulatory as others. The original FEIS stated there would be no big game retrieval. For a younger person that is a big deal but not impossible. For elderly and physically disabled that makes it impossible to retrieve big game and is discrimination. The Forest does not consider the aging population or the disable veterans of this nation as needing access to the land within this DSEIS. (DS-005, page 1; DS-001, page 1; DS042, page 3)

Response:
As noted in the 2009 Response to Comments Appendix A, there are no legal requirements to allow persons with disabilities to use motor vehicles on roads, on trails, and in areas that are closed to motor vehicle use. Restrictions on motor vehicle use are applied consistently to everyone and are not discriminatory. Wheelchairs are allowed on all NFS lands that are open to foot travel, and wheelchairs, including battery-powered, are specifically exempted from the definition of a motor vehicle by the Travel Management Rule. Opportunities for motor vehicle use exist under all alternatives.

Generally, granting an exemption from designation for people with disabilities would not be consistent with resource protection and other management objectives of designation decisions and would fundamentally alter the nature of the Forest Service's travel management program (29 U.S.C. 794; 7 CFR 15e.103). The Forest Service recognizes persons with disabilities in other areas of recreation where resource protection is not an issue such as Golden Eagle passes, etc.

Also note that this topic was discussed in the DSEIS under Environmental Justice and Civil Rights, beginning at DSEIS page III-202.

Comment #144: Environmental justice: effects on women not analyzed (4901)

The contention in the DSEIS that the proposed action will not have discernible effects on women may be in error. Please note that many women have written to the Forest Service of conflicts and safety concerns regarding motorized ORV use on the Boundary Trail and other backcountry *hiking* trails. Women have also spoken to Forest Service District Rangers about these user conflicts. (DS-016, page 8)

Response:
This comment seems to be discussing the previous 2009 DEIS and/or 2009 FEIS. There is no text in the 2011 DSEIS that states "…the proposed action will not have discernible effects on women." As noted above, this topic is discussed in the 2011 DSEIS under Environmental Justice and Civil Rights, beginning at DSEIS page III-202.

Substantive Comments – DSEIS Other

<u>Comment #145</u>: Regarding road maintenance (brush hog): are studies done to see if endangered vegetation is affected? (6000)

I have pictures of FS vegetation removal along roads in the forest. They used a brush hog and destroyed every living plant and bush. Did anybody do a study to see if any endangered vegetation was destroyed? (DS-005, page 1)

Response:
This comment is related to ongoing road maintenance and largely out of the scope to Travel Management; however, Forest botanists are routinely involved with road maintenance activities and provide recommendations as necessary for protection of rare plants.

<u>Comment #146:</u> Process failed to coordinate with Six Rivers NF, Oregon Dept. of Agriculture and BLM (6001)

The RRSNF failed to adequately coordinate with Six Rivers National Forest or Oregon Department of Agriculture about the opportunity to reduce spread of Alyssum. (DS-016, page 72)

We are disappointed in the fact that there has been little or no coordination with the Bureau of Land Management (BLM) who is also presently working on Travel Management Plans including off-road vehicle designations. It is imperative that the two Federal Agencies work together on joint travel plans (especially in the Applegate Adaptive Management Area). (DS-031, page 1)

Response:
As stated at DSEIS page I-13, the Rogue River-Siskiyou National Forest held discussion and dialogue with neighboring Forests and Bureau of Land Management (BLM) District Offices including: the Umpqua, Fremont-Winema, Six Rivers, and Klamath National Forests; as well as the Roseburg, Coos Bay, Lakeview, and Medford BLM Districts. Oregon Department of Agriculture personnel are routinely involved with noxious and invasive species detection and treatments across the Forest.

The 1999 Decision Notice for Integrated Noxious Weed Management on the Rogue River National Forest (Rogue River National Forest Weed Management Plan), as well as the 2005 Record of Decision for Preventing and Managing Invasive Plants provides the Rogue River-Siskiyou National Forest with current and up-to-date techniques for effective, integrated noxious plant management.

The Rogue River-Siskiyou National Forest has a program to treat non-native (exotic) species that are listed by the State of Oregon as noxious (also called invasive in some instances); *Alyssum murale* and *Alyssum corsicum* are "A" Designated weeds on the Oregon State Noxious Weed List. The Forest strategizes funding for noxious weed management across the whole forest.

Forest personnel have been treating Alyssum infestations as funding and timing allow as described in the Integrated Noxious Weed Management Plan for the Rogue River National Forest (1999), which authorizes treatment of noxious weeds with a variety of methods. See DSEIS pages II-50 to II-51 for a list of mitigation measures applicable to all Action Alternatives designed to inhibit movement of invasive non-native species.

<u>Comment #147:</u> Josephine County Sheriff and Board of Commissioners object to process, lack of coordination and 45-day comment period (6002)

As the elected Sheriff and Chief Law Enforcement Official of Josephine County, I take issue with having your travel management plan dropped on my desk for review and comment within a 45 day period. If this project started about 2002, you have had plenty of time to develop your strategy and plans, without consulting this Office or allowing this Sheriff any level of participation. (DS-027, page 2)

The position of the Josephine County Commissioners is that we cannot adequately provide specific statements or a decision on the merits of the alternatives at this time because we have not had the opportunity to have our concerns and questions addressed by the Forest Service. However, we do have concerns, one of which is in regards to public access with the proposed closed routes.

Response:
A summary of the public involvement process and the relationship to government agencies, including Josephine County, is as follows:

- In 2006-2007, the Rogue River-Siskiyou National Forest began the process to implement the 2005 Forest Service Travel Management Rule, Subpart B.
- In 2007, the Forest began pre-scoping by gathering information and suggestions from government agencies, including Josephine County, and the general public.
- Official scoping was mailed to Josephine County and all other government officials in August 2008.
- In March 2009, government officials and the general public were afforded a 45-day comment period on the original Draft EIS.
- In November 2009, the Forest released a Final EIS (FEIS) and Record of Decision (ROD). Interested governments and the public were afforded a 45-day appeal period. The ROD received over 175 appeal points during the 45-day appeal period.
- A Notice of Intent (NOI) was published in the Federal Register on August 2, 2010, and all interested parties, including local government officials, were mailed a notification of supplemental analysis.
- Periodic meetings with the Josephine County Sheriff's office and other interested government officials were convened throughout 2010 to 2011 while the Forest Service completed supplemental analysis to the original EIS. In addition, the Forest Service presented the DSEIS to the Josephine county commissioners during a regularly scheduled meeting in the fall 2011.
- In September 2011, the Forest Service released the DSEIS and notified all local governments.

Therefore, this EIS process complies with CEQ/FS regulations (40 CFR§§ 1501.7, 1503.1; 36 CFR§ 215.5, 220.4) by inviting affected State and local agencies for (1) pre-scoping and scoping processes, (2) providing an opportunity to State and local agencies to submit comments during the official comment periods, as well as (3) additional meetings requested by commenters during the analysis period.

While the issue with the process is duly noted, it has been made clear that this proposal and its analysis is not about closing roads. As stated in the DSEIS, Maintenance Level 1 roads are "closed" by definition, and Level 2-5 roads are "open" by definition. This process is about designating where motorized vehicle use would be allowed; it is not a proposal to physically close (or decommission) any roads or trails.

<u>Comment #148:</u> Josephine County Sheriff may use access roads and trails for protection , health and safety 6003

As the elected Sheriff, I am responsible for the health, safety, and welfare of all the citizens within this geographic jurisdiction. Having said that, I have the authority, and responsibility to protect the health, safety, and welfare of the citizens in this geographically defined jurisdiction. As such, I must assert my lawful authority to use any road, or trail deemed essential in this regard to conduct law enforcement operations including crime prevention, crime response, fire suppression, emergency medical response, assistance to federal agents, search and rescue operations, drug cartel and illicit drug eradication, and related operations. (DS-034, page 2)

Response:
As noted above, this proposal and its analysis is not about closing roads. This process is about designating where motorized vehicle use would be allowed; it is not a proposal to physically close (or decommission) any roads or trails.

Given this assumption, none of the Action Alternatives would substantially change the ability to physically use and Maintenance Level 2-5 road in the case of an emergency. Access on most Level 1 roads would also not be changed; some are passable now, some are not, and some could be made passable with some additional clearing in the event of an emergency. As noted in DSEIS page II-16:

> "Except in Wilderness and other congressionally designated special areas, the following are exempt from prohibitions associated with each alternative when granted by the District Ranger or Forest Supervisor:
>
> - Limited administrative use by the Forest Service.
> - Use of any fire, military, or law enforcement vehicle for emergency purposes.
> - Authorized use of any combat or combat support vehicle for national defense purposes.
> - Law enforcement response to violations of law, including pursuit (Note: emergency access and law enforcement pursuit does not necessarily require permission from the Forest Supervisor).
> - Use and occupancy of National Forest System lands and resources pursuant to a written authorization issued under Federal law or regulations."

****

List of DSEIS Respondents

Note: DS = Draft Supplemental and number corresponding to input reference

<u>Governmental Agencies/Officials</u>

DOI Office of Environmental Policy and Compliance	**DS-009**
Josephine County Sheriff	**DS-027**
Josephine County Commissioners	**DS-034**
Environmental Protection Agency – Region 10	**DS-047**
Bureau of Land Management – Coos Bay District Office	**DS-048**

<u>Interest Groups</u>

Snowy Butte Timberlands LLC	**DS-013**
Motorcycle Riders Association	**DS-024**
Pacific Crest Trail Association	**DS-035**
Pacific Northwest 4WD Association	**DS-042**

Environmental Organizations

Applegate Wilderness Council	**DS-007**
Oregon Wild (Brookings)	**DS-010**
Klamath Siskiyou Wildlands Center (Ashland)	**DS-016**
Klamath Siskiyou Wildlands Center (Grants Pass)	
CascadiaWildlands	
American Hiking Society	
Oregon Wild	
Big Wildlife	
Friends of the Kalmiopsis	
Rogue Riverkeeper	
Oregon Wild (Eugene)	**DS-022**
Friends of the Kalmiopsis	**DS-036**

Individual/Family

Approximately **432** individuals and/or families provided comments. The complete listing is part of the Project Record and is available on request. Note that a majority of the individual comments were generated via an electronic site established to facilitate an electronic response (that contained a pre-determined viewpoint), and therefore were essentially identical.

D5-0009

United States Department of the Interior
OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush St., Suite 515
San Francisco, CA 94104

IN REPLY REFER TO:
ER# 11/918

Electronically Filed

7 November 2011

Mr. David Krantz
USDA FS, Forest Planner
Rogue River-Siskiyou National Forest
3040 Biddle Road
Medford, OR 97504

Subject: Review of the USFS Draft Supplement Environmental Impact Statement (DSEIS), Rogue River-Siskiyou National Forest, Motorized Vehicle Use, Supplement the Existing 2009 FEIS, Implementation, Douglas, Klamath, Jackson, Curry, Coos and Josephine Counties, OR and Del Norte and Siskiyou Counties, CA

Dear Mr. Krantz

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port

Patricia Sanderson Port
Regional Environmental Officer

cc:
Director, OEPC

DS- 0027

JOSEPHINE COUNTY SHERIFF'S OFFICE

Sheriff Gil Gilbertson
601 NW 5th St – Grants Pass OR 97526
(541) 474-5120
FAX (541) 474-5114
e-mail: jocosheriff@co.josephine.or.us
GGilbertson@co.josephine.or.us

Dear Scott Conroy:

Attached is my input at this time.
Albeit you may sense a level of disappointment and frustration in the attachment, I sincerely want to work with you to a successful solution. We have yet to convene a sit-down to discuss any of the issues and I feel that is necessary. I have pointed out a few issues and look forward to meeting with you soon.
Regards,
Gil Gilbertson

15 November 2011

To: David Krantz
Environmental Coordinator
Supervisor's Office
3040 Biddle Road
Medford, Oregon 97504

From: Gil Gilbertson, Sheriff

Re: Travel Management Plan

Dear Mr. Krantz:

The USFS has not been forthcoming in many issues. I find this yet another unsettling affront to the Sheriff Office. As the elected Sheriff and Chief Law Enforcement Official of Josephine County I take issue with having your travel management plan dropped on my desk for review and comment within a 45 day period.

If this project started about 2002, you have had plenty of time to develop your strategy and plans, without consulting this Office or allowing this Sheriff any level of participation. If this is what you consider "Coordination", I cannot accept this as a proper method of working together. I have been in Office for the last five years and none of this information was shared with me until the closing event; and further, demanding a response according to your time schedule.

1/2

DS-0027

In the five years, I have been in Office; the USFS never once even alluded to an opportunity to "Coordinate" as required by your own rules and regulations.

I have found the USFS law enforcement abusive with a tendency leaning towards harassment and violating property owner rights in Josephine County. All of which, I am willing to discuss further, as a side issue. I am concerned about the manner in which your LE officers engage the citizens I am bound to protect.

Regarding your travel plan, I see one option is to take "no action"; but I am told that is not an option we can select. Now, my choice is - "no action". I have no idea what roads were closed, in this County, over the many years. I am not comfortable in approval of any option of your plan not knowing your past actions.

As the elected Sheriff, I am responsible for the health, safety, and welfare of all the citizens within this geographic jurisdiction. Having said that, I have the authority, and responsibility to protect the health, safety, and welfare of the citizens in this geographically defined jurisdiction. As such, I must assert my lawful authority to use any road, or trail deemed essential in this regard to conduct law enforcement operations including crime prevention, crime response, fire suppression, emergency medical response, assistance to federal agents, search and rescue operations, drug cartel and illicit drug eradication, and related operations.

I am willing to work with both the USFS and BLM in the preservation of our natural resources but I will not abrogate the Sheriffs' authority or responsibilities. I look forward to such a meeting.

I request an opportunity to discuss all of the aforementioned issues to find a workable solution. However, until the USFS and/or BLM can identify past, present, or future closures and satisfactorily articulate a sound reason for doing so - I will not recognize any gates, trenches, or other types of barricades.

I recently encountered a locked gate to which neither of my two keys could open. In the future, I will cut or remove such barricade to gain access. In the event a life is lost, I will do everything within my power to see the victim's family seeks appropriate civil remedy as provided by law. I see your road closure plan as a reckless and wanton disregard for human safety and life. Please prove me wrong.

Regards,
Gil Gilbertson, Sheriff
Josephine County
(541) 474-5120

2/2

DS-0034

Josephine County Board of Commissioners
Sandi Cassanelli, Chair - Simon G. Hare, Vice Chair - Don Reedy, Commissioner

November 21, 2011

Scott Conroy, Forest Supervisor
C/O David Krantz, Project Lead
Forest Supervisor's Office
3040 Biddle Road
Medford, OR. 97504

Dear Mr. Conroy;

Thank you for the recent copies of the 2011 Draft Supplemental Environmental Impact Statement for the Motorized Vehicle Use on the Rogue River-Siskiyou National Forest.

The Josephine County Board of Commissioners requests that this letter be entered as part of the public record for this proposed action so we will have standing to the subsequent decision.

Our position is the County cannot adequately provide specific statements or a decision on the merits of the alternatives at this time because we have not had the opportunity to have our concerns and questions addressed by the Forest Service. However, we do have concerns, one of which is in regards to public access with the proposed closed routes.

We have requested and look forward to a Forest Service Representative briefing on the proposed Travel Management Plan, but none have been available to date.

We have previously requested coordination status with the Forest Service and have not had the opportunity for such coordination.

Please enter our objection to this process into the record.

Board of County Commissioners

S. Cassanelli
S. Cassanelli, Chair

Simon G. Hare, Vice Chair

Don Reedy, Commissioner

COURTHOUSE
500 N.W. Sixth Street, Dept. 6, Grants Pass, Oregon 97526 - Phone: (541) 474-5221 Fax: (541) 474-5105
"Josephine County is an Equal Opportunity Employer and complies with Section 504 of the Rehabilitation Act of 1973."

DS - 0047

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 21 2011

Scott Conroy, Forest Supervisor:
C/O David Krantz, Project Lead
Forest Supervisor's Office
3040 Biddle Road
Medford, Oregon 97504

Re: U.S. Environmental Protection Agency (EPA) review and comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for Motorized Vehicle Use on the Rogue River-Siskiyou National Forest (Forest) . EPA Region 10 Project Number: 08-053-AFS.

Dear Mr. Conroy,

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned an LO (Lack of Objections) rating to the DSEIS. A copy of the EPA rating system is enclosed.

In our February 22, 2010 comment letter on the Final EIS and Record of Decision (ROD)[1] we described how the FEIS was responsive to our concerns and recommendations on the DEIS, and provided details and recommendations relating to what was our primary remaining environmental concern - risk to human health from exposure to Naturally Occurring Asbestos (NOA).

To address our concern that the FEIS and ROD's mitigation measures to reduce the risk of exposure to NOA may not provide full protection of human health, we recommended that the Forest develop and implement a specific plan to address risk of NOA exposure. The DSEIS's proposal for a NOA informational webpage and visitor pamphlets available at ranger stations[2] is responsive to our NOA risk reduction recommendations.

We also appreciate the DSEIS's disclosure of specific NOA exposure risk reduction strategies from Forest Service Region 5. To increase the effectiveness of the stated strategy to conduct site-specific analysis for route changes to determine if the ground surface poses a health risk due to presence of asbestiform fibers,[3] we recommend that the FSEIS address how results from these analyses would be considered in travel management including future Motor Vehicle Use Map updates.

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[1] Available online at: http://yosemite.epa.gov/oeca/webeis.nsf/(PDFView)/20100006/$file/20100006.PDF?OpenElement
[2] DSEIS, p. II-53
[3] Ibid.

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DS-0047

Please contact me at (206) 553-1601 or by email at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by email at peterson.erik@epa.gov with any questions or concerns regarding this review.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Cc: David Krantz, Project Lead

Enclosure

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DS-0047

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 U.S. 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
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
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
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.

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DS- 0048

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
COOS BAY DISTRICT OFFICE
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In Reply Refer To:

8011 (ORC040)

DEC - 1 2011

Mr. David Krantz
Environmental Coordinator
Supervisor's Office
3040 Biddle Road
Medford, Oregon 97504

Dear Mr. Krantz:

Thank you for the opportunity to comment on the Travel Management Plan for the Rogue/Siskiyou National Forest. This letter provides information in addition to a field visit that Kip Wright, our Field Office Area of Critical Environmental Concern (ACEC) Manager had with District Forest Ranger Alan Vandiver on September 29, 2010 to the Hunter Creek area.

We have a few concerns in regards to the plan. First, the plan identifies a motorized use trail that originates (or ends) in T. 37 S., R. 14 W., Section 13 that is not accurately mapped in your document as it actually is located in the BLM's Hunter Creek Bog ACEC. Our current management plan for the area prohibits motorized vehicular use of the area. In addition, there are old mining roads that originate on the Forest Service's section of trail that allows easy access into the ACEC. In order to alleviate these concerns the trail would need to be rerouted on to Forest Service ownership and the mining roads would need to be blocked to prevent vehicular traffic.

The second concern has to do with the conversion of FS Road 195 to a motorized trail. The BLM has had an on-going problem with ATV use occurring on BLM lands in the North Fork Hunter Creek ACEC (T. 37 S., R. 14 W., Section 1, 2, 11, and 12), which is closed to ATVs. Riders access the BLM land from an unsigned trail, which is well known to the locals that originates off of Road 195. Our concern is that once the area is converted to a motorized trail and placed on a map there will be an increase in ATV traffic. We understand that through this process any open cross country travel is prohibited and individuals can receive citations for such a violation. However, law enforcement in this area is problematic due to the open nature of the country and lack of resources available to federal agencies. Of particular concern is the large acreage of sensitive plant species and cultural items that occur in the North Fork Hunter ACEC. We would like to work with the Gold Beach Ranger District to find a mutually agreeable solution to limit this trespass problem.

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I am confident we can work together to find solutions that best meet the needs of the public while managing the area for its unique natural resource values. My staff and I would like to meet with you to discuss this further. Please contact Kip Wright at (541) 751-4242 to arrange a meeting date and location if you are in agreement. I greatly appreciate your efforts to resolve this continuing problem and for your work on the Travel Management Plan.

Sincerely,

Kathy Hoffine

Kathy Hoffine
Myrtlewood Field Manager

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Appendix B

Forest Plan Direction and Proposed Amendments

Two separate Forest Plans guide the Rogue River-Siskiyou National Forest. This FSEIS Appendix presents current management direction from the Land and Resource Management Plans (LRMPs) for the Rogue River and Siskiyou National Forests. The first section of this Appendix includes pertinent management direction and Standards and Guidelines relating to motorized vehicle use and off-road vehicle (ORV) use.

An additional section of this Appendix provides details of proposed Forest Plan Amendments, specific to the FSEIS Action Alternatives and to the LRMPs for the two forests.

Current LRMP Direction

Forest Plan Direction Related to ORV Use
Rogue River-Siskiyou National Forest

Land management direction is contained in the Land and Resource Management Plans (LRMPs) for the Rogue River National Forest (1990) and the Siskiyou National Forest (1989). *The Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl* amended the Rogue River and Siskiyou National Forest LRMPs on May 20, 1994. This amendment provided new goals, objectives, standards, and guidelines for resource management. It added several new land allocations, each with its own set of Standards and Guidelines. These land allocations overlay and merge with the allocations from the 1989 SNF and 1990 RRNF LRMPs.

Late-Successional Reserves
As a general guideline, non-silvicultural activities located inside Late-Successional Reserves that are neutral or beneficial to the creation and maintenance of late-successional habitat are allowed (ROD C-16).

Dispersed recreation uses, including hunting and fishing, generally are consistent with the objectives of Late-Successional Reserves. Use adjustment measures such as education, use limitations, traffic control devices, or increased maintenance when dispersed and developed recreation practices retard or prevent attainment of Late-Successional Reserve objectives (ROD C-18).

Riparian Reserves
RM-2. Adjust dispersed and developed recreation practices that retard or prevent attainment of Aquatic Conservation Strategy objectives. Where adjustment measures such as education, use limitations, traffic control devices, increased maintenance, relocation of facilities, and/or specific site closures are not effective, eliminate the practice or occupancy (ROD C-34).

Rogue River NF Land and Resource Management Plan

From LRMP Page 4-24: Off-road vehicles (ORVs) are allowed in all areas of the Forest except where they are specifically restricted to designated roads, trails, or other areas where they are specifically not allowed. The following table shows the acres by type of ORV use:

Off Road Vehicle Use	Acres
Permitted	99,000[1]
Restricted to designated roads and trails	411,000
Prohibited	122,000

Management Areas in which ORV use is prohibited include Backcountry Non-motorized Areas (except over-snow seasonal use in some areas), Wilderness, Wild River, Restricted Watersheds, and Research Natural Areas.

ORV use is restricted to designated roads and trails in the following Management Areas: Developed Recreation, Special Interest Areas, Scenic River, Botanical Areas, Big Game Winter Range, Old-Growth, Mature Habitat, Spotted Owl Habitat, Restricted Riparian, Managed Watershed, and Timber Suited 2 (timber lands designated as Management Strategy 21) (For more discussion of ORV use, see Appendix C, Off-Road Vehicle Management Plan.)

Standards and Guidelines relating to Off-Road Vehicle use from the LRMP:

1990 Rogue River National Forest Land and Resource Management Plan		
Management Strategy		**Standard and Guidelines**
1	Minimum Management	**Recreation - Roaded Natural** #13. Off-road vehicle recreation use on roads, trails or areas is permissible if not in conflict with strategy goals and objectives.
3	Backcountry Non-motorized	**Recreation – Semi-Primitive Non-Motorized** #3. Motorized and mechanized vehicle use is generally prohibited in this management area except for approved mining operations.
4	Developed Recreation	**Recreation – Roaded Natural** #7. Off-road vehicles and standard vehicles shall only be permitted on the roads or trails not closed to such use.
5	Special Interest Area	**Recreation - Roaded Natural To Semi-Primitive Non-Motorized** #5. Off-road vehicles will be allowed only on designated routes or within areas where their use is compatible with the purpose of the special area.
6	Foreground Retention	**Recreation – Roaded Natural** #9. Off-road vehicle use is permitted if evidence of use meets the visual quality objective. When this activity begins to adversely impact the visual qualities of these areas, restrictions will be imposed on off-road vehicle activities.
7	Foreground Partial Retention	**Recreation – Roaded Natural** #9. Off-road vehicle use is permitted if evidence of use meets the visual quality objective. When this activity begins to adversely impact the visual qualities of these areas, restrictions will be imposed on off-road vehicle activities.
8	Middleground Retention	**Recreation – Roaded Natural** #5. Off-road vehicle use is permitted if evidence of use meets the visual quality objective. When this activity begins to adversely impact the visual qualities of these areas, restrictions will be imposed on off-road vehicle activities.

[1] Travel Analysis conducted in 2008 determined that Management Strategies that allow cross-country motorized use include approximately 99,000 acres.

1990 Rogue River National Forest Land and Resource Management Plan		
Management Strategy		**Standard and Guidelines**
9	Middleground Partial Retention	**Recreation – Roaded Natural** #18. Off-road vehicle recreation use on roads is permissible, if not in conflict with strategy goals and objectives.
10	Wild River*	**Recreation – Semi-Primitive Non-Motorized** #8. Prohibit motorized/mechanized (bicycles, etc.) in the Wild River Area.
11	Scenic River*	**Recreation – Roaded Natural** #11. Off-road recreation vehicles and standard vehicles shall only be permitted on the roads or trails not closed to such use. **Facilities** #5. Off-Road Vehicles will be restricted to: (a) trails on which the use will neither damage the trail or soils. (b) roads closed to highway vehicles on which ORV use will neither damage the road nor the soils.
12	Botanical Area	**Recreation - Semi-Primitive Non-Motorized/Roaded Natural** #6. Motorized vehicles will be allowed only on roads except in emergency situations.
13	Wilderness	**Recreation – Primitive** #5. Prohibit motorized/mechanized (bicycles, etc.) use in Wilderness.
14	Big Game Winter Range	R**ecreation – Roaded Modified** #4. Allow off-road vehicle use only on designated roads and trails when it will not conflict with big game winter range values. #6. Control vehicle access in big game winter range as needed between November 1 and April 30 to prevent biological stress. **Facilities** #2. Between the end of the big game hunting seasons (approximately November 1 and April 30), the following Road Traffic Management Strategies will be utilized to limit the number of roads open to vehicle traffic to approximately l-1/2 miles per square mile of land. (d) Allow off-road vehicle use only on designated roads and trails when It will not conflict with winter range values.
15	Old Growth	**Recreation - Semi-Primitive Motorized/Roaded Natural** #7. Off-road vehicle recreation use allowed only on designated roads and trails. [***This MA is removed by the Northwest Forest Plan***]
16	Mature Habitat	**Recreation – Roaded Modified** #7. Off-road vehicle recreation use allowed only on designated roads and trails.
17	Primary Range	**Recreation – Roaded Natural** #5. Prohibit vehicle use off of roads where this activity threatens livestock and/or damages forage production or other resources.
18	Secondary Range	**Recreation – Roaded Natural** #5. Prohibit vehicle use off of roads where this activity threatens livestock and/or damages forage production or other resources.
19	Spotted Owl Habitat**	**Recreation - Semi-Primitive Motorized** #6. Off-road vehicle recreation use allowed only on designated roads and trails.
20	Timber Suitable I	**Recreation – Roaded Modified** #15. Off-road vehicle recreation use is permitted when not in conflict with timber management or other resource objectives.
21	Timber Suitable II	**Recreation – Roaded Modified** #6. Off-road vehicle recreation use allowed only on designated roads and trails. **Facilities** #6. Off-Road Vehicles will be restricted to: (a) Trails on which the use will neither damage the trail nor the soils. (b) Roads closed to highway vehicles on which ORV use will neither damage the road nor the soils.
22	Restricted Watershed	**Recreation - Roaded Natural To Semi-Primitive, Non-Motorized** #5. Prohibit vehicle use off of roads except when associated with authorized use or for administrative needs approved by the District Ranger. **Facilities** #5. Off-road recreation vehicles are not permitted. This prohibition includes both on-road and off-road use.
23	Managed Watershed	**Recreation – Roaded Modified** #5. Off-road vehicle recreation use is allowed only on designated roads and trails when it would not conflict with watershed management objectives.

1990 Rogue River National Forest Land and Resource Management Plan		
Management Strategy		Standard and Guidelines
25	Research Natural Area	**Recreation - Roaded Natural To Semi-Primitive, Non-Motorized** #12. Off-road vehicle recreation use is prohibited.
26	Restricted Riparian	**Recreation – Roaded Natural** #7. Restrict vehicle use to roads and trails except where prohibited. **Facilities** #6. Off-Road Vehicles will be restricted to: (a) Trails on which the use will neither damage the trail nor the soils. (b) Roads closed to highway vehicles on which ORV use will neither damage the road nor the soils.
*Standards and Guidelines for Wild River and Scenic River are taken from the Upper Rogue River Wild and Scenic Management Plan that amended the RRNF LRMP in December 1993. **MA 19 was vacated by a Forest Plan amendment signed by the Secretary of Agriculture, October 1990.		

Additional direction for off-road vehicle use is contained in LRMP Appendix C. It is included in this Appendix for reference.

ROGUE RIVER NATIONAL FOREST
OFF-ROAD VEHICLE MANAGEMENT PLAN
Appendix C - LRMP

INTRODUCTION

This appendix summarizes the direction found m the Forest Plan regarding the use of off-road vehicles (ORV's) on the Rogue River National Forest and outlines the process used to further refine this direction in the future through Forest Plan implementation. As used in this appendix, the terms "off-highway" and "off-road' are synonymous.

Various laws, regulations, and Executive Orders recognize on-road and off-road uses as legitimate activities on National Forests. Executive Order 11644, as amended by Executive Order 11989, directs that the designation of off-road vehicle areas shall be based upon minimizing damage to soils, watersheds, vegetation, and other resources, and minimizing conflicts with other uses.

Regulation 36 CFR 219 21 (d) requires that the Forest Service consider the impacts of proposed recreation activities on other uses and values and the impacts of other uses and activities associated with them on recreation opportunities, activities, and quality of experience. Off-road vehicle use is specifically addressed by 36 CFR 219 21 (g):

> Off-road vehicle use shall be planned and implemented to protect land and other resources, promote public safety, and minimize conflicts with other uses of the National Forest System lands. Forest planning shall evaluate the potential effects of vehicle use off-roads and, on the basis of the requirements of 36 CFR 295 of this chapter, classify areas and trails of National Forest System lands as to whether or not off-road vehicle use may be permitted.

Forest Service Handbook 7709 55 (Transportation Planning) sets forth a process for "Access Management". Under this process, "Access Management Objectives" are developed to accomplish the Management Area direction (Management Strategies) found in the Forest Plan. Road Management Objectives, defining the intended purpose of individual roads, and Off-Highway Travel Management Objectives, describing individual recreational experiences, are developed from the Access Management Objectives. This is an on-going process that is a part of Forest Plan Implementation and may occur through specific project planning, integrated resource management analysis, or at any time the need for review of existing Road or Access Management Objectives is warranted.

CURRENT USE
Currently, the greatest off-road vehicle uses on the Forest are the snowmobile trail systems m the Fish Lake Area and the Upper Rogue Area. Both trail systems make extensive use of Forest Service arterial and collector roads (See Jackson/Klamath winter trails map).

Some of these roads are used occasionally for winter logging. Special coordination is necessary whenever such conflict occurs. The access and travel management process should address and resolve potential conflicts between winter logging and recreation use. Solutions may include such things as excluding winter hauling on some roads, excluding snowmobile use, various forms of joint use, or plans for by-pass routes.

DIRECTION
Specific Management Area direction relating to off road vehicle use is found in the individual management strategies in Chapter 4 of this Plan. The following is a summary of that direction:

Management Area	Off-Road Vehicle Direction
1 Minimum Management	ORV permitted
3 Backcountry Non-motorized	Prohibited, except that over-snow seasonal use of areas or designated trails may be permitted
4 Developed Recreation	Restricted to designated roads and trails
5 Special Interest Area	Restricted to specific routes and to those areas where management determines use is compatible with the special area
6 Foreground Retention	Permitted if it will not compromise visual quality objective
7 Foreground Partial Retention	Permitted if it will not compromise visual quality objective
8 Middleground Retention	Permitted if it will not compromise visual quality objective
9 Middleground Partial Retention	Permitted if it will not compromise visual quality objective
10 Wild River	Prohibited
11 Scenic River	Restricted to designated roads and trails
12 Botanical Area	Restricted to designated roads
13 Wilderness	Prohibited
14 Big Game Winter Range	Permitted on designated roads and trails when not in conflict with winter range objectives
15 Old Growth	Restricted to designated roads and trails
16 Mature Habitat	Restricted to designated roads and trails

17 Primary Range	Permitted if it will not compromise livestock and forage values
18 Secondary Range	Permitted if it will not compromise livestock and forage values
19 Spotted Owl Habitat	Restricted to designated roads and trails
20 Timber Suited 1	Permitted when not in conflict with timber management or other resource objectives
21 Timber Suited 2	Restricted to designated roads and trails
22 Restricted Watershed	Prohibited
23 Managed Watershed	Permitted only where not in conflict with watershed management objectives. Restricted to designated roads and trails, except that over-snow seasonal use of certain areas may be permitted.
25 Research Natural Area	Prohibited
26 Restricted Riparian	Restricted to designated roads and trails. When sufficient snow is present, over-snow vehicle use is permitted on all roads

TRAFFIC LAWS AND ORDERS

State traffic laws have been made applicable to National Forest transportation system roads by order of the Chief of the Forest Service. These laws set minimum standards for vehicles to be operated on highways. They differ by State. As of the date of publication of this Forest Plan:

> Operating an off-road vehicle on a road open to traffic is prohibited in Oregon unless the route has been designated for use by off-road vehicles. With certain modifications, such as adding mirrors and stop lights, it is possible to make an off-road vehicle "highway legal " However, the general effect of Oregon State law is to prohibit off-road vehicle use of Forest Service roads managed as open to traffic (Maintenance Levels 2-5). When such use is necessary to meet Access Management Objectives, the route should be designated by Forest order and signed accordingly on the ground.
>
> Operating an off-road vehicle on a road maintained for passenger car traffic is prohibited in California. However, it is legal to operate an off-road vehicle on a road maintained for high clearance vehicles. Therefore, off-road vehicles are prohibited on Forest Service roads managed in Maintenance Levels 3-5 while their use is permissible on roads managed in Maintenance Levels 1 and 2.
>
> In both States, when a road is covered by at least a foot of unplowed snow, it is legal to operate an oversnow vehicle on the road. Therefore, a closure order would be required to prohibit use.

Orders of the Forest Supervisor are issued and enforced to implement management area direction defined in the management strategies and refined through Forest Plan implementation. In addition, orders may be issued to regulate special situations not specifically mentioned in the Management Area direction. As of the date of publication of this plan, orders of the Forest Supervisor regulating special off-road vehicle use situations have been issued with the following prohibitions:

Operating any vehicle off roads in violation of State law established for vehicles used off roads.

Using any vehicle, other than a snowmobile, on the Pacific Crest National Scenic Trail.

Being in an area closed to protect Threatened, Endangered, or Sensitive species.

Using any vehicle, other than a snowmobile, on a specified snowmobile route when so posted.

Using any motorized vehicle anywhere except on a designated (by green dot) open road within an established big-game regulated hunt area during the closure period.

Using an off-road vehicle on National Forest land in Section 34, T39S, RIW (Wagner Gap Area).

Using an off-road vehicle, both on or off a road, between the Mt Ashland Ski Area parking lot and Siskiyou Gap.

Possessing or using a vehicle, other than a snowmobile, between December 1 and April 30 in the following locations:

Off of Road 3770 (Blue Rock Road)
Ash Swale Area
Willow Prairie Fenced Meadow

Siskiyou NF Land and Resource Management Plan

From the Forest Management Goals (LRMP page IV-1):

10. Offer a wide range of dispersed recreation opportunities by providing recreational settings, facilities, and education necessary to meet public demand.

Standards and Guidelines relating to Off-Road Vehicle use from the LRMP:

Forest-Wide Standards and Guidelines – Dispersed Recreation
1-9: The Forest Service should provide for use of the existing trail system that serves the needs of recreationists, and satisfies demand levels in a condition that protects the resource and meets minimum requirements for health and safety. Trails should be managed to accommodate both motorized and non-motorized uses, depending on location and Management Area goals.

Management Prescriptions MA 3 - Research Natural Area
Recreation
MA 3-2: All recreation ORV use shall be prohibited.

Management Prescriptions MA 6 - Backcountry Recreation
Desired Condition: Motorized Backcountry areas will also have primitive roads used as ORV and jeep trails, and may have roads used for mining, or to cross to management areas with timber harvest.

MA 6-6: Motorized Backcountry - New facilities may be constructed, maintained or managed as follows:

5. ORV or Jeep trails may be constructed depending on recreational demand and the capability of the land to support such uses.

7. Existing roads shall be maintained at Maintenance Level 2 for use as ORV or Jeep trails.

Management Prescriptions MA 14 - General Forest

MA 14-6: South Kalmiopsis - Facilities may be constructed, maintained or managed as follows:

(e) ORV or Jeep trails may be constructed depending on recreational demand and the capability of the land to support such uses.

(g) Existing roads shall be maintained at Maintenance Level 2 for use as ORV or Jeep trails.

Additional direction for off-road vehicle use is contained in LRMP Appendix E. It is included in this Appendix for reference.

SISKIYOU NATIONAL FOREST
OFF-ROAD VEHICLE MANAGEMENT PLAN
Appendix E - LRMP

The majority of the Siskiyou National Forest is available for off-road vehicle (ORV) use. The total area open to ORV use is approximately 828,800 acres, which includes some areas that are subject to temporary or seasonal closures. However, the actual area used is by ORV's is far less[2]. The nature of the terrain, vegetative cover, and resource management requirements place restraints on the amount of area that is actually suitable.

Area	Acres
Permanent Yearlong Area Closures Affecting Off-Road Vehicle Use:	
Kalmiopsis Wilderness	179,850
Wild Rogue Wilderness	26,708*
Grassy Knob Wilderness	17,200
Red Buttes Wilderness	3,414**
Siskiyou Wilderness	5,323**
Other Areas	30,985
TOTAL	263,480
*BLM addition ~ 9,392 acres	
** Siskiyou portion	

The other permanent yearlong closure areas include Research Natural Areas, Botanical Areas, and sensitive sites such as meadows.

[2] Travel Analysis conducted in 2008 determined that Management Prescriptions that allow cross-country motorized use include approximately 175,670 acres (Management Areas 6, 13, and 14). It was further estimated that approximately 5% (14,000 acres) or less actually receive cross-country use.

There are approximately 450 miles of trail on the Forest. Approximately 44 percent of the total trail system will be affected by some type of restriction. All Wilderness trail systems are closed to motorized use and bicycles. All or a portion of seven trails which traverse about 31 miles outside Wilderness are permanently closed to motorized use based on concerns for public safety, resource protection needs, and law.

Estimated Trail Miles Closed or Restricted to ORV use follows

Trail	Miles
Kalmiopsis Wilderness	153
Grassy Knob Wilderness	0
Wild Rogue Wilderness	6
Red Buttes Wilderness	8
Siskiyou Wilderness	8
Illinois River	26[1]
Rogue River	15* **
Mt. Elijah	1
TOTAL	217
* Some of this mileage is in the Wilderness	
** Closed to horses and ORV use	

INTRODUCTION

The purpose of an ORV plan is to provide Forest Service managers with the framework to coordinate ORV use with other resource management objectives. A second purpose is to insure, over time, the continued availability of ORV recreation opportunities on the Forest. A third purpose is to provide public users of the Siskiyou National Forest with trip planning information.

Executive Order 11644, as amended May 25, 1977, requires Federal land management agencies to adopt regulations to ensure that ORV use is controlled and directed to protect resources, promote safety of all users, and minimize conflicts among the various users of public land. Land and resource management planning direction requires that each National Forest establish locations where ORV use will be allowed, restricted to some degree, or prohibited. The Code of Federal Regulations (CFR) provides the authority and process to restrict motorized use on Federal land. In addition, the Kalmiopsis, Wild Rogue, Grassy Knob, Siskiyou, and Red Buttes Wildernesses have been closed to motorized use by National legislation.

The review and analysis has been completed for the Siskiyou National Forest. This document is the result of the combined input from interested members of the public and Forest Service administrators. This Plan satisfies the requirements of 36 CFR 295 1. This Plan will be dynamic to meet changes in ORV use patterns and resource management situations.

Prior to Executive Order 11 644, problems and conflicts relating to ORV use were resolved as they occurred. During the public involvement initiated as a result of the Executive Order, few new conflicts were identified and little dissatisfaction was expressed about the ORV regulations in effect on the Forest.

Concerns identified during the public involvement process involved safety to hikers and horsemen, the noise level of motorized use, and providing opportunities for two, three, and four-wheel recreation vehicles Resource concerns identified on the Forest include water quality, soil stability, vegetative cover, deer and elk winter range, elk calving areas, and fragile environments. Additional use opportunities will be provided by the estimated 45 miles of trail to be constructed in the next 10 years which may be suitable for ORV use. Construction activities related to resource management may make available trailhead and parking areas for ORV use. Snow related ORV uses could be developed in suitable high mountain areas of the Illinois Valley Ranger District.

For much of the Forest, the heavily dissected ridge systems, which feature terrain steepness and dense vegetative cover, nearly precludes use by ORV's except on roads and trails. Use during the winter season by over-the-snow vehicles is also minor due to warm intense winter storms which result in poor snow conditions. However, the large blocks of serpentine-peridotite located on the south end of the Forest are far more conducive to ORV use. This landtype is relatively gentle, with slopes being less steep and more rounded, the vegetation more "open,' and the land surface more resistant to traffic impacts. Much of the present ORV use occurs in these areas.

ORV OPPORTUNITIES

ORV use is a part of the overall travel management planning for the Forest In some places this use coexists with other road and trail uses. The present trail system available for ORV use totals 171 miles. This represents 74 percent of the current trail system on the Forest outside of Wilderness areas. Within the next 10 years, there may be about 21 6 miles available for some form of ORV use. In addition, considerable area of the Forest has been allocated to Backcountry Recreation management (see Standards and Guidelines for Management Area 6 - Backcountry Recreation, in Chapter IV of the Land and Resource Management Plan). Some of these areas are specifically designed to accommodate motorized recreational uses. Trail systems planned in these motorized areas will be designed to include ORV's, including jeep type vehicles. Interagency management plans, like the Rogue River Wild and Scenic River Plan, may affect the restrictions on certain areas. The Forest may accommodate over-the-snow vehicle use at certain times of the year in suitable locations.

In addressing the problems relating to ORV use, this plan was prepared with the following criteria

1. There would be as few restrictions as possible based on present use and problems. As new problems are identified, they will be resolved by revising this plan.
2. Closures and restrictions should be clearly defined for the benefit of users and administrators.
3. The needs of the Forest user will be met whenever possible.

CLOSURES AND RESTRICTIONS

In order to formulate management direction within the established criteria and mitigate the problem, ORV limitations can be identified in two ways: (1) on an area basis, and (2) by a specific road or trail. These limitations also relate to season of use. In area closures, the roads and trails are open to ORV's unless they are posted and specifically closed.

There are permanent yearlong ORV closures for Wilderness, Research Natural Areas, Botanical Areas, and similar land allocations that carry a specific theme. Closures occur on trails within Wilderness and some trails serving as access to sensitive areas, and for roads on which long-term use is not desirable for some reason. Long-term seasonal ORV restrictions apply primarily to trails and roads, and in some cases to campgrounds. There are instances where short-term temporary (up to several years duration) closures or restrictions will be applied to areas, trails, and roads found on the Forest.

Although they may be applied for a variety of resource protection and public safety reasons, they will have an effect on ORV use. Restrictions on ORV use may be applied in areas to resolve or eliminate conflicts with other user groups and resource management activities. Organized activities such as hill climbs, moto-cross, or timed speed events will not be permitted; these are not considered as part of the ORV recreation role of National Forest lands.

AREA CLOSURES

Closures involve a variety of considerations, including wildlife winter range, elk calving areas, fragile soils and meadows. Each of these considerations includes elements of incompatibility with various kinds of ORV use. Ground cover, soil type, water table, wildlife habitat requirements, human needs and established patterns of use have all been considered in defining the boundaries for the area closures.

MOTORIZED TRAIL CLOSURE
Closures may be initiated based on management objectives on those trails where motorized use has caused a public safety hazard, contributed to serious soil erosion problems, is not compatible with designed standards, or has introduced use into a trail system closed by National legislation. A trail leading to an area (such as Oregon Caves National Monument) where ORV's are prohibited may be closed. A trail designed by objective to accommodate horses may be closed to ORV use if such use present substantial hazards to horse travelers.

Trails may be closed seasonally due to conflicts in patterns of use. For example, the Illinois River Trail where motorcycle and hiker conflicts occur during summer months, little conflict arises during the fail and winter period. Motorcycles have used this trail system during the 'off-season' period for fishing and hunting access, with little hiker conflicts. The trail may be closed to motorized use in the summer season only.

ROADS
Roads may be closed in support of area closures, as well as to protect the road and adjacent areas from erosion damage. Some roads which appear to be closed may be available for use by ORV's less than 40 inches in width, if posted for such use.

FIRE AND PUBLIC SAFETY
Short-term closures may be applied to ORV use during high fire danger which limits vehicle use to only Forest development roads. Under extreme situations, all roads may be closed to all uses. Other short-term closures for public safety purposes may affect use of ORV's.

MANAGEMENT REQUIREMENTS

ENFORCEMENT
Closure orders will be issued by the Forest Supervisor. Orders issued by the Forest Supervisor affecting ORV usage will become part of this plan. Orders rescinded by the Forest Supervisor will be removed from this plan. Currently there are numerous closure orders specific to certain roads. Many of these closure orders may be replaced by a Forest-wide closure order in the future. Closures and restrictions will be enforced by the District Rangers on the Siskiyou National Forest.

SAFETY
The Forest Service assumes the public to be responsible for prudent use and safe operation of ORV's on all National Forest System roads or trails open for motorized uses. Information specific to any trail or road system is available upon request.

PUBLIC INVOLVEMENT
Plan updates may be scheduled periodically to incorporate ongoing public comment regarding the need to meet changing conditions. Where conflicts arise involving ORV use and other resources, the public will be encouraged to participate in the resolution of differences.

PUBLIC NOTICE
All closures and restrictions will be posted on signs in a manner that will reasonably inform the public of the intended action. In addition, each Ranger District Office and the Supervisor's Office will post a copy of the regulations and a map showing the designated areas on the Forest.

IMPLEMENTATION AND EVALUATION
Each Forest Service office on the Siskiyou National Forest will display a map identifying area, trail and road closures, and restrictions. The Forest Off-Road Vehicle Use Map is in the process of production and will be made available to the public. Maps are available for review at the Forest Supervisor's and District Office. ORV use will be monitored. The ORV Plan will be reviewed annually and revised as new problems are identified.

SPECIFIC CLOSURES AND RESTRICTIONS
The following codes summarize ORV related Forest Closure Orders which are shown on Tables E-1 through E4. Also included are some of the exceptions allowed.

CODES AND DESCRIPTIONS

Code	Description
1a	Permanent Yearlong Closure, any motor driven vehicle prohibited.
1b	Permanent Yearlong Closure, any motor driven vehicle prohibited on meadow areas.
1c	Permanent Yearlong Closure, any motor driven vehicle prohibited, except over-the-snow machines.
1d	Permanent Yearlong Closure, any motor driven vehicle prohibited off Forest development road(s) and or trail(s).
1e	Permanent Yearlong Closure, any motor driven vehicle prohibited on Forest development road(s) and or trail(s).
2a	Temporary Yearlong Closure, any motor driven vehicle prohibited.
2b	Temporary Yearlong Closure, any motor driven vehicle prohibited on meadow areas.
2c	Temporary Yearlong Closure, any motor driven vehicle prohibited, except over-the-snow machines.
2d	Temporary Yearlong Closure, any motor driven vehicle prohibited off Forest development road(s) and or trail(s).
2e	Temporary Yearlong Closure, any motor driven vehicle prohibited on Forest development road(s) and or trail(s).
3a	Temporary Yearlong Closure, being upon area prohibited.
3b	Temporary Yearlong Closure, being on trail prohibited.
3c	Temporary Yearlong Closure, being on road prohibited.
4	Seasonal Closure to motorized use from May 15 through September 15.
5a	Seasonal Closure (restriction) when signed for closure.
5b	Seasonal Closure (restriction) when gate closed/locked.
6a	Trail also closed to bicycle use.
6b	Trail also closed to bicycle, and saddle, pack, and draft animal use.
7a	Lake closed to motor boat use.
7b	River bar speed restriction for any motor driven vehicle (5 mph or less).
8	Trailer prohibited off Forest Development Roads.

Table E-I. Area Closures Managed under 36 CFR 261.16 - **Legislative**

Wilderness	Area Affected	Closure Acreage	Code
Grassy Knob	Entire	17,200	1a. 7a
Kalmiopsis	Entire	179,850	1a, 7a
Red Buttes (Siskiyou NF portion)	Entire	3,414	1a, 7a
Siskiyou (Siskiyou NF portion)	Entire	5,323	1a. 7a
Wild Rogue	Entire	26,708	1a. 7a
(BLM area - 9,392 acres)			

Table E-2. Area Closures Managed under 36 CFR 261.56 - Administrative

Area Name	Approximate Acreage Effected	Closure Codes	Closure Order Number	Location Description
Babyfoot Botanical Area	208	1d	-	T.38S., R.9W., W.M., Sec's. 30, 31, 32, as shown on establishment map outside Kalmiopsis Wilderness.
Bear Camp Botanical Area	630	1d	-	T.34S., R.10W., W.M., Sec's. 11, 12, 13, 14, as shown on establishment map.
Big Craggies Botanical Area	859	1d	-	As shown on establishment map outside Kalmiopsis Wilderness.
Bigelow Lakes Botanical Area	411	1d	-	As shown on establishment map.
Bigelow Lakes	160	1d	1105-1	T.40S., R.6W., W.M., SW1/4NE1/4,SE1/4NW1/4, NW1/4SE1/4,NE1/4SW1/4 Sec. 14
Big Tree Botanical Area	127	1d	-	As shown on establishment map.
Bolan Lake	7	7a	1104-1	T.41S., R.6W., W.M., NW1/4 Sec. 7
Bolan Lake Botanical Area	297	1d	-	As shown on establishment map.
Burnt Ridge/Sugarloaf Mtn/ Fishhook Peak area	1,950	2e	1103-11	T.34S., R.10W., W.M., Sec. 31; T.35S., R.10W., W.M., Sec's. 5, 6, 7, 8, 17, 18, 19, 20; T.35S., R.10 1/2W., W.M., Sec's. 6, 7; as shown on closure map.
Cedar Log Flat Research Natural Area	441	1d	-	T.38S., R.8W., W.M., Sec's. 35 and 36, as established.
Chrome Ridge Botanical Area	589	1d	-	As shown on establishment map.
Coquille River Falls Research Natural Area	480	1d	1105-1	T.33S., R.11W., W.M., S1/2 Sec. 17, SW1/4 Sec. 16
Craggy Peak Research Natural Area	101	1d	-	T.40S., R.6W., W.M., Sec's. 25 and 36, Siskiyou N.F. portion as established.
Days Gulch Botanical Area	1,252	1d	-	As shown on establishment map.
Eight Dollar Mountain Botanical Area	2,738	1d	-	As shown on establishment map.
Elko Campground	10	5a	1103-1	T.37S., R.13W., W.M., SW1/4 NE1/4 Sec. 19
English Cabin Meadow	40	1c	1102-6	T.35S., R.8W., W.M., S1/2 SW1/4 SW1/4 Sec. 13 NOTE: SEE CLOSURE ORDER 1102-8.
Flat Top/Bald Mtn area	10,600	2a	1102-7	T.36S.; R.9W., R.9W., R.10W., and R.11W., W.M. as shown on closure map.

Table E-2. Area Closures Managed under 36 CFR 261.56 - Administrative (Continued)

Area Name	Approximate Acreage Effected	Closure Codes	Closure Order Number	Location Description
Fly Catcher	720	1d	1105-1	T.37S., R.13W., W.M., Sec. 19; NE1/4 NW1/4 Sec. 30; NW1/4 NW1/4 Sec. 29, Unsurveyed
Foster Bar	12	5a	1103-1	T.34S., R.11W., W.M., Lot 5 Sec. 17, S1/2 NE1/4 Sec. 18
Fox - Fry Timber Sale area	4,200	2e	1103-13	T.35S., R.11W., W.M., Sec. 31; T.35S., R.12W., W.M., Sec's. 13, 14, 23, 24, 25, 26, 33, 35, 36; T.36S., R.12W., W.M., Sec's. 1, 2, 3, 4, 5, 9, 10; as shown on closure map.
Game Lake Campground	3	5a	1103-1	T.36S., R.12W., W.M., SW1/4 NW1/4 Sec. 26
Grayback Mountain Botanical Area	197	1d	-	As shown on establishment map.
Hardscrabble/Deep Purple/ Blue Indigo Timber Sale area	11,100	2e	1103-14	T.35S., R.10W., W.M., Sec's. 17, 19, 20, 29, 30, 31, 32; T.35S., R.10 1/2W., W.M., Sec. 31; T.35S., R.11W., W.M., Sec's. 25, 26, 34, 35, 36; T.36S., R.10W., W.M., Sec's. 4, 5, 6, 7, 8, 9; T.36S., R.11W., W.M., Sec's. 1, 2, 3, 4, 10, 12, 13, 14, 15, 16, 22, 23; as shown on closure map.
High Prairie	4,320	1b	1101-7	T.38S., R.12W., W.M., Sec's. 1, 2, 3, 10, 11, 12
Hobson Horn Timber Sale area	3,200	2a	1102-1	T.34S., R.9W., and T.35S., R.10W., W.M. shown on closure map.
Hoover Gulch Research Natural Area	1,290	1d	-	T.38S., R.9W., W.M., Sec's. 2, 3, 10, 11, 12, 13 and 14, as established.
Horse Creek Meadow	40	1c	1102-6	T.36S, R.8W., W.M., SE1/4 SW1/4 SW1/4 Sec. 8; SE1/4 SW1/4, Sec. 8; N1/2 SW1/4 SE1/4 SE1/4 Sec. 8; NE1/4 NW1/4 NW1/4 Sec. 17
Illahe Campground	20	5a	1103-1	T.34S., R.11W., W.M., Lot 3 Sec. 19
Indigo Prairie	80	1d	1105-1	T.35S., R.10 1/2W., W.M., S1/2 SW1/4 Sec. 19
Iron Mountain Botanical Area	1,866	1d	-	As shown on establishment map.
Josephine	280	1d	1105-1	T.38S., R.8W., W.M. NW1/4 Sec. 30; T.38S., R.9W., W.M., NE1/4 NE1/4, SE1/4 NE1/4, NE1/4 SE1/4 Sec. 25
Lawson Saddle Timber Sale area	1,350	2e	1103-11	T.36S., R.12W., W.M., Sec's. 21, 22, 27, 28, 33, 34; T.37S., R.12W., W.M., Sec. 4; as shown on closure map.
Lemmingsworth Gulch Research Natural Area	849	1d	-	T.41S., R.11W., W.M., Sec's. 2, 3, 4, 9 and 10, as established.

Table E-2. Area Closures Managed under 36 CFR 261.56 - Administrative (Continued)

Area Name	Approximate Acreage Effected	Closure Codes	Closure Order Number	Location Description
Lobster Creek Picnic Ground	5	5a	1103-1	T.35S., R.13W., W.M., Lot 8 Sec. 19
Lobster Grove Botanical Area	534	1d	-	As shown on establishment map.
Long Ridge	1,120	1b	1101-7	T.38S., R.12W., W.M., Sec. 24; SE1/4 Sec. 22; E1/2 Sec. 27; NE1/4 Sec. 34
Miller and Nook river bars	47	7g	1101-7	T.39S., R.12W., W.M., Sec's. 30, 31
Oregon Mountain Botanical Area	2,623	1d	-	As shown on establishment map.
Page Mountain Grove Botanical Area	64	1d	-	As shown on establishment map.
Pine Point Picnic Ground	1	5a	1103-1	T.37S., R.13W., W.M., SW1/4 NE1/4 Sec. 18
Port Orford Cedar Research Natural Area	1,120	1d	1105-1	T.32S., R.12W., W.M., Sec. 35; E1/2 Sec. 34; E1/2 SW1/4, SW1/4 SW1/4, SW1/4 SE1/4 Sec. 26
Quosatana Campground	37	5a	1103-1	T.35S., R.13W., W.M., Lots 4, 5, and 6 Sec. 34
Red Flat	640	1b	1101-7	T.37S., R.13W., W.M., Sec. 31, Unsurveyed
Red Flat Botanical Area	53	1d	-	As shown on establishment map.
Red Mountain	240	1b	1101-7	T.39S., R.11W., W.M., NW1/4 SW1/4, NE1/4 SW1/4, SE1/4 SW1/4, S1/2 S1/2 SE1/4 Sec.8; N1/2 NE1/4 Sec. 17
Redwood Groves Botanical Area	511	1d	-	As shown on establishment map.
Redwood river bar	12	7g	1101-7	T.39S., R.12W., W.M., Sec's. 20, 29
Rough and Ready Flat Botanical Area	1,499	1d	-	As shown on establishment map.
Sam Brown Meadow	40	1c	1102-6	T.36S., R.8W., W.M., E1/4 W1/2 SE1/4 NE1/4 Sec. 18 NOTE: SEE CLOSURE ORDER 1102-8.
Sapphire/So. Indgo Timber Sale area	2,250	2e	1103-11	T.35S., R.10W., W.M., Sec's. 6, 7, 18, 19, T.35S., R.10 1/2W., W.M., Sec's. 7, 18, 19, 30, 31; T.35S., R.11W., W.M., Sec's. 24, 25, 26; as shown on closure map.
Snaketooth Redwood Botanical Area	21	1d	-	As shown on establishment map.

Table E-2. Area Closures Managed under 36 CFR 261.56 - Administrative (Continued)

Area Name	Approximate Acreage Effected	Closure Codes	Closure Order Number	Location Description
Snow Camp	2,240	1b	1101-7	T.37S., R.12W., W.M., Sec's. 19, 30 Unsurveyed; T.37S., R.12 1/2W., W.M., Sec's. 24, 25
Snow Camp Botanical Area	1,041	1d	-	As shown on establishment map.
Sourgane Botanical Area	571	1d	-	As shown on establishment map.
Turner Tract	37	8	1103-2	T.35S., R.13W., W.M., Lots 7 and 8 Sec. 33, as shown on closure map.
Vulcan Botanical Area	133	1d	-	As shown on establishment map.
Wheeler Creek Research Natural Area	320	1d	1105-1	T.40S., R.12W., W.M., Unsurveyed SW1/4 Sec. 15; SE1/4 Sec. 16
Wild Horse	240	1d	1105-1	T.36S., R.12W., W.M., NW1/4, N1/2 SW1/4 Sec. 18
Wildhorse Campground	11	5a	1103-1	T.36S., R.12W., W.M., SE1/4 NW1/4 Sec. 18

Table E-3. Trail Closures Managed under 36 CFR 261.55(b) - Administrative

Trail Name	Trail Number	Beginning Mile Point of Closure	Miles Closed	Closure Codes	Closure Order Number	Termini of Trail Closure
Snowcamp	1103	0.0	8.2	1a, 6a	1101-5	T.37S., R.12W., W.M., Sec. 30 into T.37 1/2S., R.12W., W.M., Sec. 32
Redwood Nature	1111	0.0	11.0	1a, 6b		from Section 18, T.40S., R.13W., W.M., to its termini in Section 18, T.40S., R.18W., W.M.
Tincup 1/	1117	0.0	5.2	1a, 6a	1101-5	T.38S., R.12W., W.M., Sec. 11 into T.38S., R.12W., W.M., Sec. 6
Mislatnah 1/	1119	0.0	3.5	1a, 6a	1101-5	T.38S., R.12W., W.M., Sec's. 1, 11, 12; T.38S., R.11W., W.M., Sec. 6
Illinois River 2/	1162	0.0	26.0	1a	1104-2	From its junction with Road 4103 in Section 6, T.37S., R.9W., W.M., to its junction with local road (33)-272 Section 29, T.35S., R.11W., W.M.
Rogue River 3/	1163	0.0	15.0	1a, 6b	1103-6	From the National Forest Boundary in Section 9, T.33S., R.10W., W.M., to County Road 375 in Section 18, T.34S., R.11W., W.M.
Fish Hook	1180	0.0	1.5	3b	1103-12	From its junction with Road (2308)-076 in Section 8, T.35S., R.10W., W.M., to end in Section 17, T.35S., R.10W., W.M.
Mount Elijah	1206	0.0	1.0	1a	1104-2	From Oregon Caves National Monument in Section 15, T.40S., R.6W., W.M., to its junction with the spur trail to local road (4611)-070 in Section 15, T.40S., R.6W., W.M.

1/ Access to Kalmiopsis Wilderness
2/ Access to and through Kalmiopsis Wilderness (total miles shown)
3/ Access to and through Wild Rogue Wilderness (total miles shown)

PROPOSED FOREST PLAN AMENDMENTS

This section of this Appendix documents proposed Forest Plan Amendments that would be changed under the Action Alternatives as applicable.

Designations and restrictions on motor vehicle use are fundamentally site-specific decisions, and are not normally made in land management plans (Forest Plans). However, each site-specific motorized use decision must be evaluated to ensure it is consistent with overall management direction and Standards and Guidelines in the applicable Forest Plan. If proposed changes to the Forest transportation system (including the prohibition on cross-country motor vehicle use) would be inconsistent with the applicable land management plan, proposed amendments to the plans must be included with the alternatives so that the final decision would be consistent with the land management plan(s).

The NFMA regulations and 36 CFR 219 contain provisions that allows for amending Forest Plans. The Forest is proposing amendment to clarify the inconsistent direction contained in the Forest Plans, where it does not effectively provide limitations on management activities, is open to misinterpretation, and/or could be in conflict with the concept of establishing Forest-wide, travel planning area and route-by-route management direction in accordance with the 2005 Travel Management rule.

For amendments, the regulations require the decision-maker (the Rogue River-Siskiyou National Forest Supervisor) to determine whether the proposal would result in a significant change to the Forest Plans based on an analysis of the goals, desired conditions, objectives, guidelines and goods and services projected to be provided by the Forest Plans.

If the amendments are determined not significant, then the Forest Supervisor may implement the amendment following appropriate public notification and satisfactory completion of NEPA procedures. If the amendment is determined significant, the Forest Service would follow the same procedure as that required for development of a Forest Plan

For the RRSNF, there are two types of changes proposed as Forest Plan Amendments, overall **Forest-wide amendments** to the Forest Plans to enact the Travel Management Rule, and **route -specific amendments** in the form of changes to specific management direction and/or to Standards and Guidelines. Both types of amendments are needed under the various Action Alternatives and are proposed to allow a decision under these alternatives to be consistent with land management plan direction.

The following table summarizes the elements of proposed Forest Plan Amendments by alternative. The No Action Alternative (Alternative 1) does not include Forest Plan Amendments and is included in the table for reference. Alternatives 2, 3, 4, and 5 (the Action Alternatives) include Forest Plan Amendments according to the function and description of the alternatives. For detail regarding the alternatives, see FSEIS Chapter II.

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Rogue River National Forest LRMP					
Forest-wide amendment to implement Travel Rule	NO	YES	YES	YES	YES
Forest-wide amendment to delete ORV Plan - Appendix C	NO	YES	YES	YES	YES
Route specific Plan amendments to make motorized use on the Boundary and connector trails, O'Brien and Sturgis Fork Trails consistent with Standards and Guidelines: **MS-3, MS-25**	NO	YES	YES	NO	YES
Route specific Plan amendment to make motorized use on the Cook and Green Trail consistent with Standards and Guidelines and wording change: **MS-12**	NO	YES	YES	NO	YES
Siskiyou National Forest LRMP					
Forest-wide amendment to implement Travel Rule	NO	YES	YES	YES	YES
Forest-wide amendment to delete ORV Plan - Appendix E	NO	YES	YES	YES	YES
Route specific Plan amendments to make motorized use on the Boundary and connector trails consistent with Standards and Guidelines: **MA-3**	NO	YES	YES	NO	YES
Route specific Plan amendments to make motorized use on portions of the Lawson, Game Lake, Lower Illinois, Silver Peak Hobson Horn, and an unnamed connector trail consistent with Forest Plan Standards and Guidelines: **MA 6**	NO	YES	YES	NO	YES
Specific amendment to reconcile the conflict with North Fork Smith River Management Plan which allows motorized use and access to Sourdough Camp (Standard and Guideline **MA2-3N**)	NO	NO	NO	YES	NO

The FSEIS evaluates the effects of the proposed amendments as related to the objectives, guidelines and other contents of the Forest Plans of the Rogue River and Siskiyou National Forests as required by 36 CFR 219.10 (f). The level of analysis should be sufficient to evaluate effects associated with the site-specific changes associated with a motorized use system. Based on this evaluation (see FSEIS Chapter III, section G), the Forest Supervisor will determine whether the proposed amendments significantly change the delivery of goods and services as described in the respective Forest Plans (FSM 1926.51).

FOREST-WIDE PLAN AMENDMENTS

Current Land and Resource Management Plans provide direction for portions of the respective Forest that are open to cross-country motor vehicle use. Implementation of the Travel Management Rule requires an amendment to the applicable Forest Plans. Under the Action Alternatives, amendments to the Rogue River Land and Resource Management Plan and the Siskiyou Land and Resource Management Plan would provide consistency with the 2005 Travel Management Rule. Under the Rule, all roads, trails, and cross-country motorized use would be closed unless designated open to specific uses.

For the Action Alternatives, the following new additional text, specific to each respective Forest Plan for the Rogue River-Siskiyou National Forest, would amend travel management direction for motorized vehicle use.

Rogue River National Forest

Forest Management Direction/Forest Management Objectives: Recreation and Facilities – LRMP Chapter 4

On November 9, 2005, the Final Rule for Travel Management; Designated Routes and Areas for Motor Vehicle Use (Travel Management Rule) was published in the Federal Register. This affects 36 Code of Federal Regulations (CFR) Parts 212, 251, 261, and 295. These rules became effective in December 2005. The Rule revises several regulations to require designation of roads, trails, and areas for motor vehicle use on National Forests and National Grasslands.

In order to provide consistency, the 1990 Rogue River National Forest Land and Resource Management Plan is hereby amended to adopt and include direction with the 2005 Travel Management Rule and allowable uses associated with the *Record of Decision for Motorized Vehicle Use on the Rogue River-Siskiyou NF.* This decision is designed to enact the Travel Management Rule in compliance with 36 CFR 212.

Under this amendment, all roads and trails on the Rogue River National Forest will be closed to motorized use unless designated open to this use. This plan amendment also prohibits cross-country motorized use unless the area is designated for that use. Motorized use is designated per the Motorized Vehicle Use Map (MVUM) following national Forest Service standards that indicates which routes are designated open to the public by type of vehicle per route and season open for use. This map will be made available to the public free-of charge. There may be some changes as implementation occurs on the ground. Designation, use restrictions, and operating conditions may be revised in future decisions as needed to meet changing conditions or management strategies. This plan amendment, allows codification or the ability to issue citations for use violations not in accordance with the MVUM.

Because the Travel Analysis process was enacted to provide improved motorized use direction in compliance with current Forest Service policy and the 2005 Travel Management Rule, Forest Plan Appendix C, Off-Road Vehicle Management Plan, is removed, replaced with direction associated with the Travel Management Rule, this decision and the MVUM.

Rogue River National Forest

Forest Management Direction for RECREATION, LRMP 4-24 regarding Backcountry Non-motorized Areas (MS-3) and Research Natural Areas (MS-25) is inconsistent with the current condition and the Standards and Guidelines for MS 3 (LRMP 4-43), and for MS-25 (LRMP 4-292). The following proposed Plan Amendment would remedy this inconsistency. Route-specific amendments are also being proposed to allow the Boundary Trail and other trails on the Siskiyou Mountains Ranger District.

Current Wording	Proposed Replacement Wording
Management Areas in which ORV use is prohibited include Backcountry Non-motorized Areas (except over-snow seasonal use in some areas), Wilderness, Wild River, Restricted Watersheds, and Research Natural Areas. 4-24	Management Areas in which motorized vehicle use is prohibited include Wilderness, Wild River, Restricted Watersheds, and Research Natural Areas. Motorized vehicle use in Backcountry Non-motorized Areas and Research Natural Areas is generally prohibited (except for roads and trails designated for motorized use and over-snow seasonal use in some areas).

Siskiyou National Forest

Forest Management Objectives:
Resource Activities and Facilities – LRMP Chapter IV

On November 9, 2005, the Final Rule for Travel Management; Designated Routes and Areas for Motor Vehicle Use (Travel Management Rule) was published in the Federal Register. This affects 36 Code of Federal Regulations (CFR) Parts 212, 251, 261, and 295. These rules became effective in December 2005. The Rule revises several regulations to require designation of roads, trails, and areas for motor vehicle use on National Forests and National Grasslands.

In order to provide consistency, the 1989 Siskiyou National Forest Land and Resource Management Plan is herby amended to adopt and include direction with the 2005 Travel Management Rule and allowable uses associated with the *Record of Decision for Motorized Vehicle Use on the Rogue River-Siskiyou NF.* This decision is designed to enact the Travel Management Rule in compliance with 36 CFR 212.

Under this amendment, all roads and trails on the Siskiyou National Forest will be closed to motorized use unless designated open to this use. This plan amendment also prohibits cross-country motorized use unless the area is designated for that use. Motorized use is designated per the Motorized Vehicle Use Map (MVUM) following national Forest Service standards that indicates which routes are designated open to the public by type of vehicle per route and season open for use. This map will be made available to the public free-of charge. There may be some changes as implementation occurs on the ground. Designation, use restrictions, and operating conditions may be revised in future decisions as needed to meet changing conditions or management strategies. This plan amendment, allows codification or the ability to issue citations for use violations not in accordance with the MVUM.

Because the Travel Analysis process was enacted to provide improved motorized use direction in compliance with current Forest Service policy and the 2005 Travel Management Rule, Forest Plan Appendix E, Off-Road Vehicle Management Plan, is removed, replaced with direction associated with the Travel Management Rule, this decision and the MVUM.

Rogue River and Siskiyou National Forests

Since motorized use includes OHV use, **all Action Alternatives propose the deletion of the 1989 Siskiyou National Forest Off-road Vehicle Management Plan, Appendix E, and the 1990 Rogue River National Forest Off-road Vehicle Management Plan, Appendix C.**

ROUTE-SPECIFIC PLAN AMENDMENTS

This section documents the specific management direction in the form of Standards and Guidelines that would be changed under the Action Alternatives as applicable.

It is presented in a table format, referencing the section of the respective Forest Plans that would be changed. "Current Wording" describes the Forest Plan text as it currently states and includes a page reference from the respective Forest Plan. "Proposed Replacement Wording" is for Action Alternatives that include changes.

Rogue River LRMP Specific Plan Amendments:

BACKCOUNTRY NON-MOTORIZED - MS-3

STANDARDS AND GUIDELINES

Current Wording	Proposed Replacement Wording
RECREATION #3. Motorized and mechanized vehicle use is generally prohibited in this management area except for approved mining operations. Seasonal motorized use (i.e., snowmobiling) may be permitted in certain portions of this management area. Page 4-43	**RECREATION** #3. Motorized and mechanized vehicle use is generally prohibited in this management area except for approved mining operations. Based on historical and ongoing use, the Boundary Trail (#1207), O'Brien Trail (#900), and Sturgis Fork Trail (#903) - Siskiyou Mountains Ranger District, are specifically designated for OHV Class III motorized use. Seasonal motorized use (i.e., snowmobiling) may be permitted in certain portions of this management area.

BOTANICAL AREA - MS-12

STANDARDS AND GUIDELINES

Current Wording	Proposed Replacement Wording
RECREATION #6. Motorized vehicles will be allowed only on roads except in emergency situations. The exception is that snowmobile use may be allowed when snow depth is sufficient. Page 4-149	**RECREATION** #6. Motorized vehicles will be allowed only on roads except in emergency situations. Based on historical and ongoing use, the Boundary Trail (#1207), O'Brien Trail (#900), Sturgis Fork Trail (#903), and Cook and Green Trail (#959) - Siskiyou Mountains Ranger District, are specifically designated for OHV Class III motorized use. Snowmobile use may be allowed when snow depth is sufficient.

RESEARCH NATURAL AREA - MS-25

STANDARDS AND GUIDELINES

Current Wording	Proposed Replacement Wording
RECREATION #12. Off-road vehicle recreation use is prohibited. Page4-292 **FACILITIES** No roads, trails or other facilities will be permitted within these areas except those considered essential by the Director of the Forest and Range Experiment Station Page 4-296	**RECREATION** #12. Off-road vehicle recreation use is generally prohibited. Based on historical and ongoing use, the Boundary Trail (#1207) and connector trails - Siskiyou Mountains Ranger District, are specifically designated for OHV Class III motorized use. **FACILITIES** No new roads, trails or other facilities will be permitted within these areas except those considered essential by the Director of the Pacific Northwest Research Station

Siskiyou LRMP Specific Plan Amendments:

RESEARCH NATURAL AREA - MA-3

STANDARDS AND GUIDELINES

Current Wording	Proposed Replacement Wording
RECREATION **MA3-2** Recreation activities and uses within an RNA should be discouraged if they threaten the values for which the RNA is established; this includes overnight camping, recreation use within 200 feet of lakes, ponds and streams, and pack and saddle stock use. All recreation ORV use shall be prohibited. If other recreation uses threaten research or education values, closures or permits should be instituted. Education use of an RNA should generally be directed toward the graduate level, but may be approved for any group or purpose. On-site interpretive or demonstrative facilities should be prohibited. Publicity that would attract the general public to the area shall be avoided. Existing rails may be allowed to remain as long as the RNA objectives are not compromised. See MA3-10 for direction on new trails. Page IV-82	**RECREATION** **MA3-2** Recreation activities and uses within an RNA should be discouraged if they threaten the values for which the RNA is established; this includes overnight camping, recreation use within 200 feet of lakes, ponds and streams, and pack and saddle stock use. Recreational motorized vehicle use shall be generally prohibited. Education use of an RNA should generally be directed toward the graduate level, but may be approved for any group or purpose. On-site interpretive or demonstrative facilities should be prohibited. Publicity that would attract the general public to the area shall be avoided. Existing rails may be allowed to remain as long as the RNA objectives are not compromised. See MA3-10 for direction on new trails. Based on historical and ongoing use, the Boundary Trail (#1207 and connector trails - Wild Rivers Ranger District, are specifically designated for OHV Class III motorized use. If other recreation uses threaten research or education values, closures or permits should be instituted.

Siskiyou LRMP Specific Plan Amendment for Lawson, Game Lake, Lower Illinois, Silver Peak Hobson Horn, an Unnamed Connector Trail, and Boundary Trail:

BACKCOUNTRY RECREATION - MA-6

STANDARDS AND GUIDELINES

Current Wording	Proposed Replacement Wording
RECREATION **MA6-1** (paragraph 2) In areas designated "Non-motorized Backcountry," the use of motorized equipment is prohibited except by: 1. Authorized Forest Service personnel, or their agents, in the performance of approved administrative or management duties, and 2. Mining operators, or their agents, within the provision of approved operating plans. Page IV-98	**RECREATION** **MA6-1** (paragraph 2) In areas designated "Non-motorized Backcountry," the use of motorized equipment is prohibited except: 1. By authorized Forest Service personnel, or their agents, in the performance of approved administrative or management duties; 2. By mining operators, or their agents, within the provision of approved operating plans; and 3. Based on historical and ongoing use, portions of the Lawson #1173, Game Lake #1169, Lower Illinois #1161, Silver Peak Hobson Horn #1166, and an unnamed connector trail are authorized for motorized use.[3] 4. Based on historical and ongoing use, portions of the Boundary Trail #1207 are authorized for motorized use.

[3] These trails were specifically authorized within the Wild River Area of the Illinois Wild and Scenic River Management Plan, October 31, 1985. As stated in the 1989 SNF LRMP IV-77, objectives for Wild River are defined in the individual river management plans and are not affected by the Forest Plan. Motorized use of portions of the trails within the Non-motorized portions of Backcountry Recreation is authorized to make use of these trails consistent with management direction and Standards and Guidelines.

North Fork Smith Wild and Scenic River Management Plan[4]

(FSEIS Alternative 4 only)

STANDARD AND GUIDELINE MA2-3N

Current Wording	Proposed Replacement Wording
Recreation - MA2-3N The Recreation Opportunity Spectrum setting description of Semi-primitive Motorized shall apply at Sourdough Camp and along road 4402-206. Sourdough Camp shall remain a semi-primitive site with the 4402-206 road providing access during the dry season (June 1 to September 30) for high-clearance vehicles (road maintenance level 2). It shall be improved only as necessary to direct use to specific sites and provide sanitation to ensure the protection of river values. Rustic toilets, picnic tables, fire rings, signing, barriers, and vegetative rehabilitation could all be used. Campsites should be located in areas that already receive use and that exhibit no negative effects to river values. The capacity of the camp shall not be increased. Damage created by vehicles driving off the roads should be repaired and barriers placed to restrict vehicles to the roadway. Management Plan page 19	**Recreation** - MA2-3N Semi-primitive motorized access and opportunity at Sourdough Camp and along Road 4402-206 is excluded and prohibited.

****

[4] The North Fork Smith Wild and Scenic River Management Plan (*Oregon Section Only*) was developed by the Forest Service in 2003. It amended the Siskiyou National Forest Land and Resource Management Plan, and is considered an LRMP appendix. The specific standards and guidelines are added to Chapter IV of the Siskiyou Forest Plan.

Appendix C

Biological Evaluation and Wildlife Report

TRAVEL MANAGEMENT PLAN

ROGUE RIVER SISKIYOU NATIONAL FOREST

JUNE 2015

Terrestrial Wildlife Species

Will motorized vehicle use affect wildlife species federally listed as Threatened or Forest Service Sensitive, Management Indicator Species (MIS), or Survey and Manage species?

A Biological Evaluation process was conducted for, Proposed, Endangered, Threatened, or Sensitive (PETS) terrestrial wildlife species for this designation process; all information and findings are included within this Final EIS. It is Forest Service policy to minimize adverse effects to the habitat of listed Threatened or Endangered species and to minimize adverse effects to designated Critical Habitat for listed species as well as to protect individual organisms from harm or harassment as appropriate.

The purpose of this evaluation is to determine and document the possible effects that the proposed activity and alternatives would have on any PETS wildlife species (FSM 2672.4).

Comparison of Alternatives

Significant Issues to Wildlife	Indicator	Alternative 1 (No Action)	Alternative 2	Alternative 3	Alternative 4	Alternative 5 (Proposed Action)
Motorized Opportunities	Change in miles of roads and trails open to the public	No change	No change	-24 miles	-157 miles	-32 miles
	Miles of open roads	4,537 miles	4,537 miles	4,530 miles	4,494 miles	4,530 miles
	Miles of motorized trails	255 miles	255 miles	238 miles	141 miles	230 miles
	Miles of motorized trails within IRAs	98 miles	98 miles	76 miles	0 miles	76 miles
	Acres of cross-country travel allowed within IRAs	30,170 acres	30,170 acres	0 acres	0 acres	0 acres

A second objective of this evaluation is to ensure these species receive full consideration in the decision-making process, to maintain species viability and meet defined recovery goals. The Biological Evaluation process (FSM 2672.43) provides a description of office analysis, and mitigation activities necessary to ensure proposed management actions will not likely jeopardize the continued viability of:

- Species listed or proposed to be listed as Endangered or Threatened by the USDI Fish and Wildlife Service.
- Species listed as Sensitive by the USDA Forest Service Region 6 (USDA Forest Service 2008, FSM 2670.44).

a. Background

The US Fish and Wildlife Service (FWS) designates Proposed, Endangered or Threatened species under authority of the Endangered Species Act (ESA) of 1973 (Public Law 93-205), as amended. The Forest Service in the Pacific Northwest Region (FS Region 6) identifies and designates Sensitive species. This evaluation discloses impacts to those PETS animals that: 1), are known or are suspected to occur inside the action area based on confirmed sightings or geographic range, 2), have suitable habitat in or near the action area, and 3), would be affected by the proposed action or other alternatives. Furthermore, this process identifies conservation measures included in proposed actions that would eliminate, reduce, avoid or compensate for unwanted effects to listed species.

Section 7 of the Endangered Species Act (ESA) also directs each Federal agency to insure that any action authorized, funded or carried out by such agency is not likely to jeopardize the continued existence of any Threatened or Endangered species or result in the destruction or adverse modification of their critical habitat. The ESA also directs each Federal agency to confer or consult with the appropriate Secretary on any action, which is likely to jeopardize or affect the continued existence of any species or its critical habitat.

In compliance with Section 7 of the Endangered Species Act (ESA)(1973 *et seq*.) and the Forest Service Biological Evaluation process for Proposed, Threatened, Endangered, and Sensitive (PETS) terrestrial wildlife species, the list of species potentially occurring within the RRSNF was reviewed.

The 2011 Pacific Northwest Region (R6) listing of species applicable to the RRSNF was reviewed in regard to potential effects on any of these Sensitive species by actions associated with this proposal. Pre-field and reconnaissance results and determinations are summarized below. Tables III-6 and 7 displays the process and which of the steps were necessary to complete the impact evaluation for each PETS wildlife species considered.

Table 1. Steps in the Biological Evaluation Process – Threatened Species

FWS Listed Threatened Wildlife Species & Habitat	Pre-Field Review Existing Sighting or Habitat?	Field Reconnaissance Species/Habitat Present?	Conflict Determination Potential Conflict?	Effects Analysis Needed?
Northern Spotted Owl	Yes	Yes	Yes	Yes
Spotted Owl Critical Habitat	Yes	Yes	Yes	No
Gray Wolf	Yes	Yes	No	No
Oregon Spotted Frog	No	Yes	No	No
Marbled Murrelet	Yes	Yes	Yes	Yes

FWS Listed Threatened Wildlife Species & Habitat	Pre-Field Review Existing Sighting or Habitat?	Field Reconnaissance Species/Habitat Present?	Conflict Determination Potential Conflict?	Effects Analysis Needed?
Marbled Murrelet Critical Habitat	Yes	Yes	No	No

Table 2. Steps in the Biological Evaluation Process – Sensitive Species

Scientific Name	Common Name	Species Or Habitat Present?	Effects Analysis Needed?
Agelaius Tricolor	Tricolored Blackbird	N	N
Falco Peregrinus Anatum	American Peregrine Falcon	Y	N
Haliaeetus Leucocephalus	Bald Eagle	Y	N
Histrionicus Histrionicus	Harlequin Duck	Y	N
Melanerpes Lewis	Lewis' Woodpecker	Y	Y
Picoides Albolarvatus	White-Headed Woodpecker	Y	Y
Progne Subis	Purple Martin	Y	N
Seiurus Noveboracensis	Northern Waterthrush	Y	Y
Aneides Flavipunctatus	Black Salamander	Y	N
Batrachoseps Attenuatus	California Slender Salamander	Y	N
Plethodon Stormi	Siskiyou Mountains Salamander	Y	Y
Rana Boylii	Foothill Yellow-Legged Frog	Y	Y
Rana Pretiosa (Usfws Listed As Threatened	Oregon Spotted Frog	Y	Y

Scientific Name	Common Name	Species Or Habitat Present?	Effects Analysis Needed?
Actinemys Marmorata	Pacific Pond Turtle	Y	Y
Antrozous Pallidus	Pallid Bat	Y	Y
Corynorhinus Townsendii	Townsend's Big-Eared Bat	Y	Y
Gulo Gulo Luscus	North American Wolverine	N	N
Martes Pennanti (West Coast)(2013 To Pekania Pennanti)	Fisher	Y	Y
Myotis Thysanodes	Fringed Myotis	Y	Y
Deroceras Hesperium	Evening Fieldslug	N	Y
Helminthoglypta Hertleini	Oregon Shoulderband	Y	Y
Monadenia Chaceana	Chase Sideband	Y	Y
Monadenia Fidelis Beryllica	Green Sideband	Y	Y
Monadenia Fidelis Celeuthia	Travelling Sideband	Y	Y
Pristiloma Arcticum Crateris	Crater Lake Tightcoil	Y	Y
Vespericola Sierranus	Siskiyou Hesperian	Y	Y
Vanduzeeina Borealis Californica	California Shield-Backed Bug	N	N
Bombus Franklini	Franklin's Bumblebee	Y	Y
Bombus	Western Bumblebee	Y	Y

Scientific Name	Common Name	Species Or Habitat Present?	Effects Analysis Needed?
Occidentalis			
Callophrys Johnsoni	Johnson's Hairstreak	Y	Y
Callophrys Polios Maritima	Hoary Elfin	Y	Y
Plebejus Podarce Klamathensis	Gray-Blue Butterfly	Y	Y
Plebejus Saepiolus Littoralis	Insular Blue Butterfly	Y	Y
Polites Mardon	Mardon Skipper	Y	Y
Speyeria Coronis Coronis	Coronis Fritillary	Y	Y
Chloealtis Aspasma	Siskiyou Short-Horned Grasshopper	Y	Y

Summary of effects by Alternative

Significant Issue to Wildlife	Indicator	Alternative 1 (No Action)	Alternative 2	Alternative 3 (Proposed Action)	Alternative 4	Alternative 5
Terrestrial Wildlife Listed Species	Determination for listed species	N/A	Effects to the northern spotted owl and marbled murrelet due to disturbance could occur under and would result in a "may effect, not likely to adversely effect (NLAA)" determination. No effect to Critical Habitat for spotted owls and murrelets, No effect to Gray Wolf or Spotted Frog			
Management Indicator Species	Harassment to big game (deer and elk) within winter range areas	No change	No change to the current condition	Harassment potential would be decreased due to the reduced potential for noise and human activities through the elimination of cross country travel and the reduction in the amount of roads open to the public		
	Effects to other MIS species	No change	No change to the current condition	Neither of the alternatives would result in substantial direct or indirect adverse effects to other MIS species		
Survey and Manage Species	Effects to Survey and Manage species	No change	No change to the current condition	Due to the potential of disturbance to from noise and use associated with passenger vehicle and OHV traffic, alternatives may impact but not adversely impact these species		

b. Effects Mechanisms and Analysis Framework

See the assumption discussion at the beginning of Chapter III for a general list of assumptions used in this analysis.

Available literature indicates that public wheeled motor vehicle use of roads and trails affects wildlife, directly and indirectly, in a wide variety of ways. Although there is a considerable body of research describing effects of motorized roads and trails on wildlife, these interactions are complex, variable, and information gaps remain (Gaines et al. 2003, Trombulek and Frissell 2000, USDA Forest Service 1998). Road and trail-related effects can be categorized in a variety of ways; for this analysis they have been placed into the following three categories: effects resulting from human-caused mortality, effects resulting from changes in behavior, and effects resulting from habitat modification.

Human-caused mortality can be the result of collisions, hunting, trapping, poaching, negative human interactions, and collection. Death or injury from a vehicle hitting or running over an animal is well documented and affects the vast majority of terrestrial species, though to varying degrees (Trombulak and Frissell 2000). In general, road mortality increases with traffic volume and speed, and road kill on native surface forest roads is generally not significant for large mammals (USDA FS 1998). Small mammals and herpitiles are more vulnerable because individuals are inconspicuous and slow-moving. Amphibians may be especially vulnerable to road mortality because their life histories often involve migration between wetland and upland habitats (Trombulak and Frissel 2000, USDA FS 1998). Raptors are also be vulnerable to collisions on forest roads due to their foraging behaviors, but the most substantial documented mortality has been along highways. Roads and motorized trails open areas to increased poaching or illegal shooting and losses from incidental trapping. These factors can be substantial for species with low population numbers for which even low rates of additive mortality may affect population stability. On the RRSNF, the current magnitude of these impacts or their influence upon populations is largely unknown.

Changes in behavior can include displacement or avoidance, impacts on breeding behavior, and physiological impacts. Gaines et al. (2003) reviewed literature on road- and trail-associated effects upon wildlife and found that alteration of use of habitats in response to roads or road networks was the most common interaction reported. Fifty to sixty percent of the 29 focal species reviewed were impacted in this manner (Gaines et al. 2003). Studies have documented shifts in an animal's home range area, shifts in foraging patterns, and disturbance of nesting or breeding behaviors resulting from motorized road or trail use and associated increased human recreation activity facilitated by motorized access (Foppen and Reijnen 1994; Johnson et al. 2000; Rost and Bailey 1979). Recreation activities (hiking, camping, fishing, shooting, etc.) that are associated with the access provided by motorized routes, result in indirect disturbance and displacement effects that often exceed the direct influence of the roads and trails.
Many species avoid areas in proximity to roads or trails, or exhibit flight behavior within a certain distance of route use, though studies documenting the magnitude and duration of behavioral responses are limited. Road usage by vehicles has a substantial role in determining animal's road avoidance behavior.

Black bear, for example, crossed roads with low traffic volume more frequently than roads with high traffic volume, and almost never crossed interstate highways (Brody and Pelton 1989).

Perry and Overly (1977) documented displacement of deer up to 800 meters from major roads, and from 200 to 400 meters from secondary and primitive roads.

Activities that create elevated sound levels or result in close visual proximity of human activities at sensitive locations (e.g., nest trees), have the potential to disrupt normal behavior patterns. Studies of the effects of human disturbance upon wildlife have revealed that the immediate postnatal period in mammals and the breeding period in birds are time periods when individuals are most vulnerable to disturbance. Intrusion-induced behaviors such as nest abandonment and decreased nest attentiveness have led to reduced reproduction and survival in species that are intolerant of intrusion (Knight and Gutzwiller 1995). Foppen and Reijnen (1994), for example, found that the reproductive success of forest bird species declined in areas fragmented by roads. Wasser et al. (1997) found that stress hormone levels were significantly higher in male northern spotted owls (but not females) when they were located less than 0.25 miles from a major logging road compared to spotted owls in areas greater than 0.25 miles from a major logging road. Chronic high levels of stress hormones may have adverse consequences on reproduction or physical condition of birds, though these effects are not well understood.

Wildlife response to noise disturbance is complex, being neither uniform nor consistent. Delaney et al. (1999) reviewed literature on the response of owls and other birds to noise and concluded that birds generally flush in response to disturbance when distances to the source are less than about 200 feet and when sound levels are in excess of 95 decibels and the tendency of a bird to flush from a nest declines with experience or habituation to the noise, although the startle response cannot be completely eliminated by habituation.

Habitat modification includes habitat loss, fragmentation, edge effects, snag and down log reduction, routes for competitors, movement barriers. Road and trail networks remove habitat but also have a broader effect than just the conversion of a small area of land to route surfaces. Andren (1994) suggested that as landscapes become fragmented, the combination of increasing isolation and decreasing patch size of suitable habitat is adversely synergistic, compounding the effects of simple habitat loss. In particular, species associated with old forest habitats may be impacted by such effects. A decrease in interior forest patch size results in habitat loss and greater distance between suitable interior forest patches for sensitive species such as the northern spotted owl and American marten.
Additional habitat modification occurs as an indirect effect of managing roads or trails for public wheeled motor vehicle use. Trees posing a potential safety hazard ("hazard trees") are removed along roads. These trees are typically snags that are within a tree-height distance from the road. This safety policy results in a largely "snag free" zone of 200 to 300 feet from a road's edge, also affecting the recruitment of large down wood within this zone. Few hazard trees are typically removed along trails.

Major highways are known to create movement barriers for a number of wildlife species, particularly wide-ranging carnivores and ungulates, and are suspected of being a major factor in the decline of some forest carnivores, such as fisher and marten (Brody and Pelton 1989, USDA FS 2001). The slower speed and lower traffic volume roads and trails that are being evaluated in the alternatives are less likely to create barriers to movement. However, the extent to which

denser networks of roads and trails might result in barriers to movement for some wildlife species is unknown (USDA FS 2001a).

The following species account discussions are specific to those species on the RRSNF that have the potential to be affected.

Threatened Species and Critical Habitat

On June 30, 2011, the US Fish and Wildlife Service (Service) released the *Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina)* (USDI FWS 2011). The Notice of Final Revised Recovery Plan Availability was published in the Federal Register on 07/01/2011 (76 FR 38575 38576) for the Northern Spotted Owl. Recovery plans are not regulatory documents; rather, they provide guidance to bring about recovery and establish criteria to be used in evaluating when recovery has been achieved. The Forest continues to work with the Service to incorporate Recovery Goals and Actions consistent USFS laws and regulations. The RRSNF is a participant in the inter-organizational spotted owl working group (Recovery Action 1) and will continue demographic monitoring to address Recovery Actions 2 and 3.

The RRSNF is also a collaborator in Recovery Actions that address barred owl issues, such as Recovery Action 32 (RA 32). The intent of RA 32 is to maintain substantially all of the older and more structurally complex multi-layered conifer forests on Federal lands in order not to further exacerbate the competitive interactions between spotted owls and barred owls. Within the administrative units of the Rogue River-Siskiyou National Forest and the BLM, an interagency, interdisciplinary team was created to develop a methodology for identifying Recovery Action 32/ structurally complex forest for project level planning and NSO consultation needs in SW Oregon. The most current methodology will be used to identify RA 32 stands for each project. These projects will not impact any stands that would be considered as RA-32 stands as all nesting, roosting and foraging (NRF) stands that are being treated with fuels have been previously treated with commercial timber sales years prior to the writing and implementation Recovery Plan and RA-32, all roadside and recreation sites are not likely RA-32 stands as they have ongoing felling of hazard and danger trees and will not meet the definition of RA-32 as described in the developed methodology because they lack snags and down wood.. No managed stands proposed for treatments would meet the RA-32 definition.

Projects in this BA will also meet other Recovery Actions listed in the Revised Recovery Plan, such as Recovery Action 10. All projects in this BA will meet Recovery Action 10 because the proposed treatments will not reduce nesting, roosting and foraging habitat or dispersal within the provincial home range of any spotted owl sites. No vegetation for spotted owls NRF and dispersal habitat will be treated.

Northern Spotted Owls

Definitions

Nesting, Roosting, and Foraging (NRF) Habitat for the northern spotted owl consists of habitat used by owls for nesting, roosting, and foraging. Generally, this habitat is multistoried, 80 years old or older (depending on stand type and structural condition), and has sufficient snags and

down wood to provide opportunities for nesting, roosting, and foraging. The canopy closure generally exceeds 60 percent, but canopy closure or age alone does not qualify a stand as NRF. Other attributes include a high incidence of large trees with various deformities (e.g. large cavities, broken tops, mistletoe infestations, and other evidence of decadence), large snags, large accumulations of fallen trees and other woody debris on the ground, and sufficient open space below the canopy for owls to fly (Thomas *et al*., 1990).

In southwest Oregon, NRF habitat varies greatly, but is typified by mixed-conifer habitat, recurrent fire history, patchy habitat components, and a higher incidence of woodrats (a high quality spotted owl prey species). It may consist of somewhat smaller tree sizes. One or more important habitat components, such as dead down wood, snags, dense canopy, multistoried stands, or mid-canopy habitat, might be lacking or even absent in portions of NRF habitat in southwest Oregon. NRF habitat also functions as dispersal habitat.

Dispersal Habitat is a subcategory of "all dispersal" habitat for northern spotted owls. All-dispersal is defined as dispersal plus NRF. Throughout this document, "dispersal" will be used to describe dispersal-only habitat. Thomas *et al*., 1990, defined dispersal habitat as forested habitat more than 40 years old, with canopy closure more than 40 percent, average diameter greater than 11 inches, and flying space for owls in the understory and does not provide the components found in NRF. It provides temporary shelter for owls moving through the area between NRF habitats and some opportunity for owls to find prey; but it does not provide all of the requirements to support an owl throughout its life. Dispersal will be used throughout this document to refer to habitat that does not meet the criteria to be NRF habitat, but has adequate cover to facilitate movement between blocks of NRF habitat.

Spotted Owl Effects Mechanisms

There has been little data regarding the impacts of noise on spotted owls. However, the US Fish and Wildlife Service has recently analyzed the available data on spotted owls, murrelets and other species and has consulted species experts who have worked extensively with spotted owls to determine the extent to which above-ambient noises affect spotted owls. The results of this analysis indicate that spotted owls may flush from their nest or roost or may abort a feeding attempt of their young when the following activities occur up to the distances specified in Table 3. This data has been used by the FWS in biological opinions and it is the FWSs current understanding of harassment distances based on the best available science. Consequently, it will be incorporated into this analysis as current guidance for harassment distances for various activities as it relates to adverse effects to the spotted owl from harassment due to disturbance. If the FWSs understanding of these distances change, adjustments to these distances may be recommended in the future.

Table 3. Harassment Distances from Various Activities for Spotted Owls

Type of Activity	Distance at which spotted owl may flush or abort a feeding attempt
OHVs, chainsaws	65 yards
Heavy equipment	35 yards

The risk to spotted owls from noise disturbance is tied to the timing of the activity and is highest when adults are defending young or eggs in a nest or are feeding and protecting recently fledged juveniles. During this period, the separation of adults and their young could result in death or injury to the young as a result of predation.

The leading known causes of mortality in juvenile spotted owls are starvation and predation by great horned owls (Miller 1989). The time period when adults or offspring are unable to move away from threats or noises is between the time that the eggs are laid and when the young can fly, which is generally about two weeks after the young fledge from the nest. After the young are able to fly, it is assumed that adults and young may move, but would stay together if annoyed by noise.

The timing of these development benchmarks (nesting and fledging) varies geographically, although spotted owls are generally believed to start laying their eggs around the beginning of March. In Oregon, data based on fledge dates indicate June 30th is the date by which almost all juveniles are capable of flight. This March 1 –June 30 period of vulnerability is called the "critical nesting period." AT this time the [referred alternative (5) will reduce the potential for disturbance and should be an overall benefit for spotted owls.

Spotted Owl Critical Habitat

Critical habitat for the northern spotted owl was designated in 1992 in *Federal Register* 57, and includes the primary constituent elements that support nesting, roosting, foraging, and dispersal. Designated critical habitat also includes forest land that is currently unsuitable, but has the capability of becoming NRF habitat in the future (57 FR 10:1796-1837). Critical habitat was revised for the northern spotted owl and the final designation was published by the USFWS in the *Federal Register* and signed on August 12, 2008 (73 Federal Register 157:47326) and became effective on September 12, 2008. The 2008 USFWS's Critical Habitat delineation was challenged in court and the 2008 designation of northern spotted owl CHU was remanded and the USFWS was ordered to revise the CHU designation. On February 28, 2012, the Service released the proposed critical habitat in the form of maps and the draft form of the federal register publication. The proposed rule was published in the Federal Register on March 8, 2012 (77 Federal Register 46:14062-14165). The final CHU rule was published in the Federal Register on December 4, 2012 and became effective January 3, 2013 (77 Federal Register 233:71876-72068).

Section 4(a)(3) of the Act specifies that the Service shall designate critical habitat for endangered or threatened species and may, from time-to-time thereafter as appropriate, revise such designation. Critical habitat is defined as (1) specific areas within the geographical area occupied by the species at the time it is listed, on which are found those physical or biological features that are essential to the conservation of the listed species and which may require special management considerations or protection, and (2) specific areas outside the geographical area occupied by the species at the time it is listed that are essential for the conservation of a listed species. Regulations focus on the "primary constituent elements," or PCEs, in identifying these physical or biological features. The physical or biological features essential to the conservation of the northern spotted owl are forested lands that are used or likely to be used for nesting, roosting,

foraging, or dispersing. While five of the alternatives could slightly impact one CHU by a proposed 1.2 mile trail brushing project. This small amount of trail will however require separate NEPA, surveys, and consultation and the proposed action will not likely be included into this decision and the Forest has determined that the Travel Management Plan will have no effect to spotted owl Critical Habitat.

Marbled Murrelet

Marbled Murrelet Suitable Habitat includes conifer-dominated stands generally at least 80 years old or more with trees averaging 20 inches dbh or more. At least one potential nest tree must be present in a stand of trees at least 1 acre in size (6 per 5 acre area) and the stand trees must be at least one-half the height of the site-potential tree.

Marbled Murrelet Suitable Structure

Potential marbled murrelet nest trees occur within 50 miles (81 kilometers) of the coast (USDI 1997) and below 2,925 feet in elevation (Burger 2002). Murrelets nest in one of four tree species: western hemlock, Douglas-fir, Sitka spruce, or western red cedar (Nelson and Wilson 2002). Nest trees are ≥19.1 inches DBH and greater than 107 feet in height, have at least one platform 4" inches or more in diameter, contain nesting substrate (e.g., moss, epiphytes, duff) on that platform, and have an access route through the canopy that a murrelet could use to approach and land on the platform (Burger 2002; Nelson and Wilson 2002). Nest trees have a tree branch or foliage, either on the tree with potential structure or on a surrounding tree, which provides protective cover over the platform (Nelson and Wilson 2002). Other important attributes of the platform are vertical and horizontal cover and substrate. Known nest sites have platforms that are generally protected by branches above (vertical cover) or to the side (horizontal cover) (Huff et al. 2006, 14). Marbled murrelets appear to select limbs and platforms that provide protection from predation (Luginbuhl et al 2001, 558; Marzluff et al. 2000, 1135; Raphael et al. 2002b, 226 and 228) and inclement weather (Huff et al. 2006, 14). Substrate, such as moss, duff, or needles, on the nest limb is important for protecting the egg and preventing it from falling (Huff et al. 2006, 13)

The distance inland that marbled murrelets breed is variable and influenced by a number of factors including nesting habitat availability, climate suitability, maximum foraging range, and predation rates. Most murrelets appear to nest within 37 miles (60 km) of the coast (Miller and Ralph 1995); the Service (USDI 1997p.32) considers 50 miles (31 km) as the minimum inland distance for determining habitat suitability and amount within the listed range. Commuting distances are, however, extremely variable, with birds in Washington tending to commute larger distances that those in Oregon and California. The "Marbled Murrelet Effectiveness Monitoring Plan for the Northwest Forest Plan" (Madsen et al. 1999) considers the primary nesting range of the species to extend inland 35 miles (22 km) in Oregon. In Washington, Oregon and California, nests continue to be found below 2,625 feet (800 meters) in elevation (McShane et. al 2004).

Marble Murrelet Occupied Habitat occurs when murrelets are located within stands by interagency established survey protocol (Evans Mack et al. 2003). Survey data collected by the Rogue River-Siskiyou National Forest (Forest Service) and BLM in southwestern Oregon (9,795 survey visits for murrelets between 1988 and 2001) indicate murrelets inhabit forested areas

relatively close to the ocean. Murrelets have not been found more than 32 miles (51.5 kilometers) inland on the Powers Ranger District or more than 16 miles (25.7 kilometers) inland on the Gold Beach or Chetco Ranger Districts of the Rogue River-Siskiyou National Forest, located adjacent to Medford BLM (Dillingham et al. 1995; USDA and USDI 1996; USDA and USDI 2003, Appendix I). There is approximately 329,000 acres of suitable murrelet habitat located within those watersheds known to be occupied by murrelets on the RRSNF (Chetco, Smith, Elk, Rogue Lower Wild, Rogue Lobster, and the Coquille-Sixes).

The Forest Service and BLM completed an evaluation to better quantify the likelihood of murrelet occurrence beyond the eastern boundary of the western hemlock/tanoak vegetation zone in southwest Oregon (USDA and USDI 2001). This evaluation refined the existing survey zone boundaries to better reflect known murrelet occurrence. Area A encompasses the known range of the marbled murrelet. Approximately 172,276 acres of suitable habitat are located in Area A on RRSNF lands. NWFP LSRs and other reserved areas contain 90 percent of the suitable habitat in Area A; any stands of suitable habitat in Matrix subsequently found to be occupied are designated as additional "Murrelet" LSR. Area B is a "buffer" to Area A and includes all land 6.2 miles (10 kilometers) east of Area A. Surveys are conducted only in Areas A and B. Federal land east of Area B is assumed to not contain murrelet habitat and is no longer surveyed. To date, no murrelets have been documented in Area B on the Rogue River Siskiyou National Forest. (The Service concurred with the evaluation conclusions in a letter: *Technical Assistance on the Final Results of Landscape Level Surveys for Marbled Murrelets in Southwest Oregon* (USDI Fish and Wildlife Service reference: 1-7-02-TA-6401).)

Marbled Murrelet Effects Mechanisms

FWS listed the marbled murrelet as Threatened under the Endangered Species Act in 1992 (USDI FWS 1992b). The primary reasons postulated for the decline in marbled murrelet numbers included a loss of nesting habitat and poor reproductive success (USDI FWS 1997). Predation via corvids and or rodents is also considered a threat to reproductive success. Critical habitat for marbled murrelets was designated in 1996 and corresponds primarily to areas designated as Late-Successional Reserve in the Northwest Forest Plan (USDA and USDI BLM 1994, USDI FWS 1996).

The results of the same analysis by the FWS indicates that murrelets may flush from their nest or roost or may abort a feeding attempt of their young when the following activities occur up to the distances specific in Table III-9. These distances are somewhat different than the distances for spotted owls due to the available scientific data.

In addition, a visual harassment distance of a minimum of one hundred yards is included and is based on an effort by the Services' Regional Office to quantify both visual and auditory harassment to murrelets (USDI 2003). This data has been used by the FWS in two biological opinions and it is the Service's current understanding of harassment distances based on the best available science. Consequently, it will be incorporated into this analysis as current guidance for harassment distances for various activities as it relates to adverse effects to the murrelets from harassment due to disturbance. If the Services' understanding of these distances change, adjustments to these distances may be recommended in the future.

Table 4. Harassment Distances from Various Activities for Marbled Murrelet

Type of Activity	Distance at which murrelets may flush or abort a feeding attempt
OHVs, chainsaws	100 yards
Heavy equipment	100 yards

Above-ambient noises further than these distances from murrelets are expected to have either negligible effects or, if the sound reaches no murrelet, no effect to murrelet. The types of reactions that murrelets could have to noise that the FWS considers having a negligible impact include flapping of wings, the turning of a head towards the noise, attempting to hide, assuming a defensive stance, etc.

The risk to murrelets from noise disturbance is tied to the timing of the activity and is highest when adults have eggs in a nest or are feeding and protecting recently fledged juveniles. During these periods the separation of adults and their young could result in death or injury to the young as a result of predation. The leading known causes of mortality in juvenile murrelets are starvation and predation by corvids (Miller 1989).

The timing of these development benchmarks (nesting and fledging) varies geographically, although murrelets generally start laying their eggs around the beginning of April. In Oregon, August 5th is the date by which data indicate that all juveniles are capable of flight and most have likely fledged and returned to the ocean sites.

Marbled Murrelet Current Critical Habitat

In 1996 critical habitat for the marbled murrelet was designated by the Service (FR: 61:26255-26320). On July 31, 2008, the Service proposed a revision of the designated critical habitat (FR 73:44678-44701)(USDI FWS 2008b). The proposed revision would remove approximately 254,070 acres in northern California and Oregon from the 1996 designation. Of the CHUs within the action area, only CHU #-OR-07-d would change (total acreage would decrease by approximately 26,524 acres. This revision did occur in the summer of 2014.
This proposed action, no murrelet CHU habitat will be impacted by changes to murrelet habitat and overall there will be less potential disturbance to CH due do prohibition for off road travel.

Marbled Murrelet
None of the **Action Alternatives** would remove or modify any murrelet habitat. The only proposed trail construction/reconstruction within the range of the murrelet occurs within a meadow where the trail follows an old wagon road. No habitat is present within this meadow. Disturbance related effects would be the similar for the murrelet as described for the spotted owl. **Alternatives 1, 2, and 4** would result in a **no effect (NE)** determination for disturbance or habitat modification.

Effects to the murrelet due to disturbance could occur under the **Alternatives 3 (Proposed Action) and alternative 5(the preferred alternative)** and would result in a "**may effect**, **not likely to adversely affect (NLAA)"** determination assuming mitigation measures are applied.

This determination is due to conversion of Maintenance Level 1 roads to motorized trails under this alternative. It is assumed that there would be no measurable change in the amount of use these routes currently receive. However, at this time there is no information that would allow the FS to meaningfully measure, detect, or evaluate potential effects. Therefore, though any effects may be discountable, an NLAA determination is made for disturbance to spotted owls.
If new or increased potentially disturbing activities are implemented within the prescribed distances (Table 4) of occupied or unsurveyed murrelet habitat during the murrelet critical nesting season (April 1 – Aug 5), those activities would likely to adversely affect murrelets by causing adults to flush from their nest site, nest abandonment, premature fledging, interruption of feeding attempts, or increased predation due to less protection when the adult flushes. After August 5, it is presumed that most fledgling have returned to the ocean and disturbance from proposed actions within the prescribed distances shown in Table 4. Between August 6 and September 15, project activities would not adversely affect murrelets, if daily timing restrictions are applied until September 15. Again no suitable marbled murrelet habitat will be treated under any alternative.

Gray Wolf

Life history information for the gray wolf is contained in the publication Wolf Biology and Ecology (USFWS 1994). Wolf recovery programs are occurring in Idaho, Montana, and Wyoming, and wolf numbers there have expanded greatly. Another Effort is being effort is being pursued in Oregon (ODFW 2010). A Federal recovery plan for wolves was completed for the Northern Rocky Mountains (USFWS 1987).
Gray wolves are generalists that use a broad range of elevations and habitats. Mortality is higher for wolves when road densities are >1 mile per square mile because of potential conflicts with the increased human presence in those areas (Thiel 1985, Wisdom et al. 2000). However, they may inhabit areas with greater road densities if those habitats are adjacent to relatively unroaded areas (Mech 1989).

Wolves generally den in areas near forest cover and ungulates for prey that are away from human activity. Denning is from mid-April to July and wolves are sensitive to disturbance during that time. They use rendezvous sites for resting and gathering areas after the pups are mobile enough to leave the den. Rendezvous sites are often around meadows near forested stands that provide resting areas under trees. Home ranges have been estimated at 19-687 square miles, and probably depend on the availability of ungulates for food (Wisdom et al. 2000). Ungulates comprise 85-95% of their diet, although beaver, snowshoe hare, and other small animals may make up the remainder. Carrion may additionally be a food source (Mech 2003, Witmer et al. 1998).

Roads and trails can alter wolf movement and use of the landscape (Whittington et al 2004). Although low-use roads and low-use trails may be used as travel pathways for wolves, they tend to avoid contact with humans near high-use roads/trails.
Strategies for wolf conservation include limiting accidental or intentional shooting, allowing for seclusion at den and rendezvous sites, maintaining a dependable yearlong source of available prey, and providing sufficient space with minimal exposure to human activities (USFWS 1987). Wolves are currently denning in the High Cascade portion of the forest. There will be no

changes to the road or trail system on the high cascades and the forest believes that the will be no effect to wolves from the proposed action.

Oregon Spotted Frog

The Oregon spotted frog is found from extreme southwestern British Columbia south through the Puget Trough, and in the Cascades Range from south-central Washington at least to the Klamath Basin in southern Oregon. Oregon spotted frogs occur in lower elevations in British Columbia and Washington and are restricted to high elevations in Oregon (Pearl et al.2010). In addition, Oregon spotted frogs currently have a very limited distribution west of the Cascade crest in Oregon, are considered to be extirpated from the Willamette Valley in Oregon (Cushman et al. 2007), and maybe extirpated in the Klamath and Pit River basins of California (Hayes 1997). Across the range of the species, of the 61 historical localities where the species' previous existence can be verified (e.*g.,* museum specimens, photographs, reliable published records), only 13 were confirmed as being occupied in studies conducted in the 1990s (Hayes 1997; McAllister and Leonard 1997). Hayes visited historical localities one to four times, with a minimum of 2 hours devoted to site visits for localities that could be identified precisely. For sites where the location was imprecisely known, he searched three to six points in the area that possessed favorable habitat, for 20 minutes to 3 hours, depending on site size. He also visited sites that were judged to have a potentially high likelihood of having Oregon spotted frogs (i.e., within the historical range, consistent with elevations documented for verifiable specimens, and within suitable habitat) (Hayes 1997,). Based on those studies, Hayes (1997,) estimated the species may no longer occur in 76 to 90 percent of its historical range. Although this estimated loss of historical localities does not take into account the localities found since 2000, the current range of the Oregon spotted frog is significantly smaller than the historical range, based on the best available scientific and commercial information (DOI USFS 2014).

Oregon spotted frogs occur on the Fremont-Winema National Forest on the Williamson River (Williamson River Unit), Sevenmile Creek and Fourmile Creek (Upper Klamath Lake Unit), and potential habitat at Buck Lake (Upper Klamath Unit). In addition, an adult OSF was recently detected near Wood River Day Use Area (T. Adams pers. obs 2013). Oregon spotted frog has not been confirmed on the Forest although surveys were conducted in 2007 on the High Cascades RD in high potential areas.

In general across the Klamath Basin, OSF populations appear low. It is expected that there are undiscovered populations on private land within the Klamath Basin, and three new populations were discovered by the Fish and Wildlife Service in 2010. As stated in the 2014 U.S. Fish and Wildlife Service Oregon Spotted Frog Proposed Listing document (USDI 2014), there are several efforts taking place on the Forest and adjacent agency and private lands to restore and conserve populations. Activities on the Forest include, the development of a Site Management Plans for the Jack Creek, Sevenmile Creek, and Buck Lake populations; completion of a Conservation Agreement in 2010; annual interagency eggmass surveys; collaboration with the Regional Interagency Oregon Spotted Frog Working Group; collaboration with US Geological Survey on research studies; and various restoration activities on Jack Creek and the Williamson River. The only potential for spotted frogs is in the extreme southern portion of the High

Cascades Ranger District. As there will be no changes to this portion of the travel management plan in the Ranger district the forest believes that there will be no effect to Oregon spotted frog.

Table 4. Effects Determination – Threatened Species

FWS Listed Threatened Wildlife Species & Habitat	Effects Determination				
	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Northern spotted owl	NA	NE	NLAA	NE	NLAA
Northern spotted owl Critical Habitat	NA	NE	NE	NE	NE
Marbled murrelet	NA	NE	NLAA	NE	NLAA
Oregon Spotted Frog	NA	NE	NE	NE	NE
Marbled murrelet Critical Habitat	NA	NE	NE	NE	NE
Gray Wolf	NA	NE	NE	NE	NE

Codes for determinations:
NA – not applicable NE – no effect NLAA – may effect, not likely to adversely affect

Sensitive Species

Table 2 identifies R-6 Sensitive Species known or suspected to occur on the RRSNF. The following species were determined to have no conflict with the **Action Alternatives** because there are no known sightings or habitat potentially affected by analyzed actions, or the action area was determined to not be within the range of the species: **Northern waterthrush, California wolverine, shield-backed bug and Klamath rim pebblesnail.** The determination for these species is **"No Impact."**

Based on known or suspected species occurrence or suitable habitat the following species were analyzed and were determined to be unaffected or benefitted by the action due to prohibitions on off road travel by actions associated with the **Action Alternatives**: **American peregrine falcon, bald eagle, harlequin duck, Townsend's big-eared bat, pallid bat, fringe-tailed bat, northwestern pond turtle, foothill yellow-legged frog, Siskiyou short-horned grasshopper, coronis fritillary, insular blue butterfly, hoary elfin, Johnson's hairstreak, Franklin's bumblebee, Siskiyou hesperian, pristine springsnail, Crater Lake tightcoil, evening fieldslug.** Based on analysis, the determination for these species is **"No Impact or Beneficial Effect"** Based on known or suspected species occurrence or suitable habitat the following species were analyzed and were determined to potentially incur effects, as described below. These effects are essentially similar for all Action Alternatives. For more information on all Sensitive Species that occur on this Forest please visit (http://www.fs.fed.us/r6/sfpnw/issssp/).

Forest Service Sensitive Species

Lewis' Woodpecker and White-Headed Woodpecker

Both Lewis' and white-headed woodpeckers are associated with ponderosa pine or in the case of Lewis' oak habitats. Nests are often in the large ponderosa pine snags or mature oaks while the birds forage on insects and acorn meat. In winter they store acorn meat in crevices in trees and power poles. Because this woodpecker does not usually excavate its own cavity, they have a close tie to older snags within the forest that are likely to contain cavities and have crevices for food storage. Habitat loss is due to a wide variety of concerns that include urbanization of valley floors, fire suppression and encroachment of conifer forests, timber harvest of pine components in the oak forests, etc.

Pacific Fisher

Impacts to fishers from human activities are not well documented. However, it can be expected that fishers, as with most wild animals, would exhibit aversive reactions to direct human contact or unnaturally loud noises. It can also be expected that avoidance reactions to human-caused disturbance would be elevated for females in dens or accompanied by young kits. Aubry and Raley (2006) identified the seasonal activity patterns for fishers in the southern Oregon Cascades. Females give birth in late March and generally move kits from the natal den to maternal dens at about 8-10 weeks. Near the end of July when kits are approximately 4 months old, they are more mobile and begin to travel with their mothers. Overall, the proposed action would reduce the potential for disturbance to fisher as all off road travel would be prohibited on the Forest.

Siskiyou Mountains, California Slender, and Black Salamanders

Generally, these species are closely associated with steep rocky environments (talus, rock crevices, etc., and individuals may be found under surface debris, but will always be near sheltering rocks (Nussbaun et al. 1983). Activities that disturb the ground and debris have the most potential for impact. In addition, for individuals there is a potential for direct mortality from crushing by motorized vehicles on both the trails and seldom used roads. Overall, the proposed action would reduce the potential for disturbance to these species as all off road travel would be prohibited on the Forest and habitat for these species are not suitable habitat for off road dispersed camping.

Traveling/Chace Sideband, and Oregon Shoulderband

Although species accounts identify specific habitat types (i.e., talus, rock fissures, down woody debris) for these species, it is difficult to properly identify specific sites where they may be present. At least two of these species (*Monedenia sp*.) have been located on the Forest where they were associated with 'moist' conditions with some down woody debris. *M. chaceana* have also been found in early to mid-seral forest conditions on the High Cascades Ranger District. Activities that disturb the ground and debris have the most potential for impact. In addition, for individuals there is a potential for direct mortality from crushing by motorized vehicles on both the trails and seldom used roads. Overall, the proposed action would reduce the potential for disturbance to these species as all off road travel would be prohibited on the Forest.

Mardon Skipper

Mardon skippers use a variety of early successional meadow habitats which appear to vary by region (Kerwin 2007). Populations in southern Oregon occupy small (less than 0.5 to 10 ac), high-elevation (4,500 to 5,100 feet) grassy meadows within mixed conifer forests. (USFWS, Candidate notice of review 2005). Seven or eight locations were known from the Cascade Mountains in Southwest Oregon, most bordering the Cascade-Siskiyou National Monument, with populations ranging from a few to approximately 200 individuals (Kerwin 2007). In 2005, searches and surveys of populations on BLM and Forest Service lands in southern Oregon discovered several new sites. There are now a total of 23 known sites in southern Oregon. Trail construction or disturbance to meadow habitat would have an effect on this species.

c. Direct and Indirect Effects

Direct and indirect effects are analyzed on National Forest lands within the areas proposed for change under the Action Alternatives. The direct and indirect effects reflect the existing condition, which includes routes covered by the Federal Highway Safety Act, County Roads, and State and Federal Highways already designated for public use. The analysis includes NFS roads and trails, or routes mapped through the route inventory process that are proposed to be designated for motorized use.

Lewis' Woodpecker and White-Headed Woodpecker

Effects to Lewis' woodpecker and white-headed woodpecker due to disturbance under **Alternatives 1, 2, and 4** would result in a "**no impact"** determination. This determination is based on the fact that no new trail construction/reconstruction would occur and no Maintenance Level 1 roads would be converted to motorized trails. There would be no change in the amount of use that existing roads and trail receive, with the exception of Alternative 4, where motorized use that currently exists on approximately 114 miles of trail would be prohibited.

Under **Alternatives 3 (Proposed Action) and 5**, roads "open" to the public are reduced by approximately 31 miles. However, approximately 23 miles of Maintenance Level 1 roads would be converted to motorized trails. Effects to these woodpecker species due to disturbance could occur under **Alternatives 3 and 5** and could result in a "**may adversely impact individuals, but not likely to result in a loss of viability on the planning area, nor cause a trend to federal listing or a loss of species viability range wide" or a beneficial effect due to the closure of all off road OHV access.** This determination is due to the proposed trail reconstruction and conversion of Maintenance Level 1 roads to motorized trails under these alternatives. It is assumed that there would be no measurable change in the amount of use these routes currently receive. However, at this time there is no information that would allow the FS to meaningfully measure, detect, or evaluate potential effects. Therefore, though any effects may be discountable, a "may impact individuals" determination (MIIH) is made for disturbance to Lewis' woodpecker and white-headed woodpecker.

Pacific Fisher

Effects to the Pacific fisher due to disturbance under **Alternatives 1, 2, and 4** would result in a "**no impact"** determination. This determination is based on the fact that no new trail construction/reconstruction would occur and no Maintenance Level 1 roads would be converted

to motorized trails. There would be no change in the amount of use that existing roads and trail receive, with the exception of Alternative 4, where motorized use that currently exists on approximately 139 miles of trail would be prohibited.

Effects to the Pacific fisher due to disturbance could occur under **Alternatives 3 (Proposed Action) and 5** and would result in a "**may adversely impact individuals, but not likely to result in a loss of viability on the planning area, nor cause a trend to federal listing or a loss of species viability range wide"** determination. This determination is due to the proposed trail construction/reconstruction and conversion of Maintenance Level 1 roads to motorized trails under these alternatives. Alternative 5 would result in no new trails being constructed and a reduction to open road and cross country travel and would have a beneficial effect for fisher. It is assumed that there would be no measurable change in the amount of use these routes currently receive. However, at this time there is no information that would allow the FS to meaningfully measure, detect, or evaluate potential effects. Therefore, though any effects may be discountable, a "may impact individuals" determination (MIIH) is made for disturbance for Pacific fisher.

Mollusks

Under **Alternatives 1, 2, and 4**, there is no trail construction proposed in habitat nor is there any conversion of Maintenance Level 1 roads to motorized trails. For these alternatives, there is a determination of **"no impact."**

Under **Alternatives 3 (Proposed Action) and 5**, there are no trails proposed and as such no additional impacts would occur except for when they may occur at dispersed sites (se Survey and Manage discussion). Therefore, though any effects may be discountable, a "may impact individuals" determination (MIIH) is made for disturbance for mollusks.

Mardon Skipper, bumblebee and other meadow associated species.

Under **Alternatives 1, 2, 4, and 5,** there is no trail construction proposed within any meadow and all meadows would be closed to of road OHVs in the preferred alternative 5. For these alternatives, there is a determination of **"no impact."**

Under **Alternative 3 (Proposed Action)**, the conversion of a foot trail to an OHV trail of 0.5 miles of trail through potential habitat on the Gold Beach Ranger District would affect some meadow habitat for this species. Therefore, a "**may impact individuals, but not likely to result in a loss of viability on the planning area, nor cause a trend to federal listing or a loss of species viability range wide"** determination (MIIH) is made. It is recommended that an additional survey of this site be conducted prior to any reconstruction. If surveys are conducted and no individuals are found, a **"no impact"** determination is warranted. In addition the prohibition of off road travel will be an overall beneficial effect on these species.

d. Cumulative Effects

Present and foreseeable future actions that may affect terrestrial wildlife species or habitats on the Forest include: wildland fire, fuels treatments, livestock grazing, dam maintenance, minerals management, developed and dispersed recreation, timber harvest and vegetation treatments,

reforestation, restoration, road management, and special uses. All of these activities will be designed to meet the direction provided within the Northwest Forest Plan and the local Land and Resource Management Plans (i.e., Forest Plans), and in accord with Aquatic Conservation Strategy objectives (NWFP 1994, Rogue River NF LRMP 1990, and Siskiyou NF LRMP 1989). None of the alternatives would result in substantial direct or indirect adverse effects to terrestrial wildlife species. Thus, implementation of the project is not expected to result in detrimental cumulative effects to terrestrial wildlife species or habitat.

All routes that are being considered for designation within the alternatives of this project currently exist and are receiving some amount of use. Further, it is assumed that because of this existing use, regardless of which alternative is selected, detrimental effects to terrestrial wildlife habitat and populations from the motorized route network would either be reduced or maintained when compared to the current condition.

Management Indicator Species

Will motorized vehicle use affect species identified as LRMP Management Indicator Species, especially deer and elk within Big Game Winter Range areas?

Management Indicator Species (MIS) represent the issues to support recovery of Federally-listed species, provide continued viability of Sensitive species, and enhance management of wildlife and fish for commercial, recreational, scientific, subsistence, or aesthetic values or uses. Management indicators representing overall objectives for wildlife, fish, and plants may include species, groups of species with similar habitat relationships, or habitats that are of high concern (FSM 2621.1).

An indicator species represents all other wildlife species which utilize a similar habitat type. Indicator species act as a barometer for the health of various habitats and are to be monitored to quantify habitat changes predicted by implementation of the Forest Plans.

a. Background

Five forest wildlife species and one group were selected as Management Indicator Species (MIS), as detailed in the 1990 Rogue River Land and Resource Management Plan. Indicator species were intended to serve as habitat surrogates used to suggest qualitatively the condition of the habitat they represent.

Black-tailed deer and **Roosevelt elk** habitat will be managed to provide adequate forage, hiding cover, and thermal cover conditions throughout summer and winter range. Three species represent mature and old-growth forest habitat conditions: **pine marten**, **pileated woodpecker**, and **spotted owl**. Habitat for **woodpeckers** (besides pileated) is managed based on land allocations.

The 1989 Siskiyou NF LRMP identified eight management indicator species. These include the **bald eagle** (habitat along major rivers), **osprey** (habitat along large rivers), **spotted owl** (old-growth forest), **pileated woodpecker** (mature forest), **pine marten** (mature forest), **black-tailed deer** (early forest successional stages), **Roosevelt elk**, (early forest successional stages), and **woodpeckers** (wildlife trees or snags).

b. Effects Mechanisms and Analysis Framework

See the assumption discussion at the beginning of Chapter III for a general list of assumptions used in this analysis.

Black-tailed Deer and Roosevelt Elk

Deer and elk are likely to be affected by the following road or motorized trail-associated factors: collisions, hunting, poaching, displacement or avoidance, disturbance at a specific site (Gaines et al. 2003).

Mortality from vehicle collisions on highways and other surfaced roads is often substantial, but collisions on native surface routes with lower speeds and traffic volumes, such as the routes that are being evaluated in this project, is probably slight.

Greater human access can increase opportunities for hunting as well as poaching of deer and elk. Since hunting levels for deer are controlled through tag limits established by Oregon Department of Fish and Wildlife, an increase in hunting opportunity or hunter success is unlikely to impact deer populations (deVoss et al. 2003). Hunting limits also take into account estimates of the amount of illegal kill and road kill occurring.

In general, studies show that deer and elk will move away from, or flush, from an approaching person and will usually allow a person in or on a vehicle to get closer than a person on foot (Freddy et al. 1986; Wisdom et al. 2005).

In northeast Oregon, movement rates and flight responses in deer were not as substantial as in elk; however deer tended to seek dense cover when disturbed, which may reduce forage opportunities and a reduction in opportunities to put on needed fat for winter. Wisdom et al. found that mule deer showed little measurable flight response to experimental OHV treatments but cautioned that deer may well be responding with fine-scale changes in habitat use (i.e., avoidance), rather than substantial increases in movement rates and flight responses. Several studies have found that deer avoid areas in proximity to roads.

Road density can also have adverse effects on deer. These include loss of habitat, increased harvest from both legal and illegal hunting, and vectors for invasive/non-native species. High road densities and the associated traffic have been shown to decrease habitat quality and increase vulnerability for deer. During winter, when big-game species are on winter ranges, forage availability and value is generally low due to senescence of grasses and forbs. During this period open roads and the associated traffic have even greater detrimental effects on big-game due to their inability to escape harassment (disturbance) and both legal and illegal hunting pressure due to deep snow.

Elk experience higher levels of stress when exposed to increased road density. Physiological indicators of stress, such as fecal glucocorticoids, have been observed in elk exposed to increased road density and traffic on roads (Millspaugh et al. 2001). Energetic costs of moving away from disturbance associated with roads may be substantial (Cole et al. 1997). During periods of deep snow, disturbance associated with roads likely increases energetic costs even more. In elk, if

body fat is reduced below 9% as animals enter the winter period, the probability of surviving the winter is reduced (Cook et al. 2004).

American Marten

Motorized routes can impact marten in a number of ways. Gaines et al. (2003) found marten likely to be affected by the following road and motorized trail-associated factors: collisions, displacement or avoidance, habitat loss or fragmentation, snag reduction, down log reduction, edge effects, and movement barrier or filter.

Buskirk and Ruggerio (1994) identified collisions with motor vehicles as a source of marten mortality. However, collisions are much less likely to occur along the slower-speed native surface routes that are being evaluated in this project.

Robitaille and Aubrey (2000), studying marten in an area of low road density and traffic (primarily logging roads), found that marten use of habitat within 300 and 400 meters of roads was significantly less than habitat use at 700 or 800 meters distance. Although marten were detected in proximity to roads in their study, significantly less activity occurred within these zones.

Martens are known to be sensitive to changes in overhead cover, such as can result from roads or trails (Hargis and McCullough 1984, Buskirk and Ruggiero 1994). Roads and trails can fragment habitat, and could thus affect the ability of marten to use otherwise suitable habitat on either side of the route.

High levels of coarse woody debris (snags, downed logs, root masses, large branches) is an essential component of marten habitat, especially during the winter months when marten require such structures for cover and hunting opportunities under the snow. In addition, large logs with cavities provide rest and den sites for marten. Activities that remove coarse woody debris are therefore likely to degrade marten habitat (Buskirk and Ruggiero 1994). Hazard tree removal along roads will reduce numbers of snags and, in turn, down logs within a distance of about 60 meters alongside roads. Motorized routes provide access to woodcutters, also reducing amounts of down wood within roadside corridors. These effects within 60 meters of roads may, however, be incidental to the displacement and avoidance factors that apparently influence marten use of habitat within a greater distance of motorized routes.

Northern Spotted Owl

Refer to Terrestrial Wildlife Listed Species Issue (Section E, 9, this Chapter) for background discussion and effects mechanisms related to the northern spotted owl. The Proposed Action may impact individuals, but is not likely to result in a loss of viability nor cause a trend to Federal listing or a loss of species viability range wide because of the potential for some lessened disturbance related to traffic effects.

Pileated Woodpecker and Other Woodpeckers

Cavity nesting birds include the pileated woodpecker, as well as other woodpeckers. Nesting habitat for this group of MIS is provided in forested vegetation types with snags larger than 15 inches diameter. Road and motorized trail-associated factors likely to affect these species are: edge effects and the reduction of snags and down logs. Cavity nesting birds are typically more secure from nest predation than other forest birds, and recreational disturbance is not known to be a limiting factor as it is for some other forest bird species (Gaines et al. 2003).

Snag and log reduction occurs as an indirect effect of managing roads or trails for public use. Trees posing a potential human safety hazard ("hazard trees") are removed along roads open for public use, as well as along roads receiving concentrated use during implementation of a specific project. Hazard trees are typically dead or dying trees that occur within a tree-height distance from the road. This safety policy results in a reduction in snags within a zone of about 200 to 300 feet from a road's edge. Wisdom and Bate (2008) found that human access can have substantial effects on snag density. In their study area on the Flathead National Forest in Montana, stands adjacent to roads had snag densities three times lower than the snag densities within stands not adjacent to roads. The amount of down wood is also influenced within this zone, both by the removal of hazard trees that would become future down wood, and by the access provided for woodcutters. Down wood is important as a foraging substrate, providing insects required by species like the pileated woodpecker.

Bald Eagle and Osprey

Bald eagles could be affected by the following road and motorized trail-associated factors: displacement and avoidance, or disturbance at a specific site (nest site).

Reported responses of bald eagles to human activities have included spatial avoidance of activity and reproductive failure (Anthony et al. 1995). Bald eagles seem to be more sensitive to humans afoot than to vehicular traffic (Grubb and King 1991, Hamann et al. 1999). Anthony and Isaacs (1989) found that the mean productivity of bald eagle nests was negatively correlated with their proximity to main logging roads, and the most recently used nests were located in areas farther from all types of roads and recreational facilities when compared to older nests in the same territory. Nest site protection through area closures is one of the primary ways that the Forest Service and land management entities have implemented measures to avoid the potential for nest failures due to human disturbances.

c. Direct and Indirect Effects of Alternatives

Black-tailed Deer and Roosevelt Elk

Variables such as the amount and frequency of traffic, and the spatial distribution of roads in relation to deer use, influence the degree of negative effects that roads have on deer use in forested habitats (Perry and Overly 1977; Johnson et al. 2000; deVos et al. 2003). Under all alternatives, there would be no change to existing levels of road density across the affected watersheds though Alternatives 3 and 4 and Alternative 5 would reduce the amount of roads and trails open to motorized traffic as well as closure of thousands of acres of off road travel, thereby potentially reducing disturbance to deer and elk as well as providing more and larger security areas and less disturbance during migration. However, the coupling of the diverse array of vegetative conditions with undulating terrain results in a low likelihood of deer and or elk being

unable to efficiently locate and use effective security cover. Forage production, in the form of grasses – forbs – shrubs, would not be changed under any alternative.

The High Cascades

Within the area covered by the 1990 RRNF LRMP, lands identified as Big Game Winter Range (MA 14) employs seasonal restrictions to reduce impacts to big game within winter range areas as the need is identified. These seasonal restrictions are employed so there should be no effect to deer and elk populations and therefore no impact to wolves. The Proposed Action may impact individuals, but is not likely to result in a loss of viability nor cause a trend to Federal listing or a loss of species viability range wide because of the potential for some lessened disturbance related to traffic effects.

Northern Spotted Owl

Refer to Terrestrial Wildlife Listed Species Issue (Section E, 9, this Chapter) for background discussion and effects on northern spotted owls. The Proposed Action may impact individuals, but is not likely to result in a loss of viability nor cause a trend to Federal listing or a loss of species viability range wide because of the potential for some lessened disturbance related to traffic effects.

American Marten

American marten are associated with mature habitats that generally provide relatively high levels of canopy closure, large snags, and downed wood. The Forest contains high-quality late-successional habitat that appears to be suitable for marten. Surveys that are designed to detect forest carnivores have been conducted. Marten are common on the High Cascades Ranger District. Activities that remove coarse woody debris are more likely to degrade marten habitat (Buskirk and Ruggiero, 1994). Ongoing hazard tree treatment (felling) along open Forest roads will continue to reduce numbers of snags. Motorized routes provide access to woodcutters, also potentially reducing amounts of down wood within roadside corridors. These effects within 60 meters of roads may, however, be incidental to the displacement and avoidance factors that apparently influence marten use of habitat within a greater distance of motorized routes.

Under **Alternative 1 (No-Action) and Alternative 2**, there would be no change in the current condition. Areas that are within 100-200 feet of the road prism generally have reduced suitability for den and rest sites due to previous hazard tree felling and firewood removal.

Under **Alternatives 3 (Proposed Action), 4, and 5**, there is an overall decrease in the total "open" roads for vehicular and OHV traffic across the Forest. Areas that are within 200-300 feet of the road prism would continue to have reduced suitability for den and rest sites due to previous hazard tree felling.

Activities associated with project implementation such as new trail and play area construction, and conversion of Maintenance Level 1 roads to trails are likely to have the greatest potential effects on marten during the denning and early kit rearing periods because resident marten in those areas may not be habituated to the activities proposed.

However, under **Alternatives 3, 4, and 5**, there is an overall decrease in the total "open" roads for vehicular and OHV traffic across the Forest. Therefore, these alternatives may impact individual marten, however, implementation of any of the Action Alternatives is not likely to result in a loss of viability on the planning area (Forest), nor cause a trend to Federal listing or a loss of species viability range wide. Alternative 4 would have less impact than Alternatives 3 and 5 because motorized use of some trails would be prohibited.

Pileated Woodpecker and other Woodpeckers

There would be no change from the current level of disturbance for Pileated woodpecker and other woodpeckers under **Alternatives 1, 2, and 4**.

Effects to these woodpecker species due to disturbance could occur under the **Alternatives 3 and 5.** This is due to the proposed trail construction/reconstruction and conversion of Maintenance Level 1 roads to motorized trails under this alternative. It is assumed that there would be no measurable change in the amount of use these routes currently receive. The Proposed Action may impact individuals, but is not likely to result in a loss of viability nor cause a trend to Federal listing or a loss of species viability range wide because of the potential for disturbance related to traffic effects.

Because some of these roads may intersect suitable habitat for these species, overall, the **Action Alternatives** may adversely impact individuals, but is not likely to result in a loss of viability nor cause a trend to federal listing or a loss of species viability range wide because of the potential for disturbance related to traffic effects to disrupt breeding attempts or sites along previously unused travel ways.

Bald Eagle and Osprey

Bald eagles were listed as Endangered in Oregon and elsewhere by the US Fish and Wildlife Service in 1967 (USDI FWS 1967). In 1995, bald eagles were down listed to threatened status (USDI FWS 1995). The bald eagle was removed from the federal list of endangered and threatened plants and wildlife by a ruling published in the Federal Register on July 9, 2007 and effective August 8, 2007 (72 FR 37346). Bald eagles continue to be protected under the Bald and Golden Eagle Protection Act of 1940.

Bald eagle habitat on the Rogue River-Siskiyou NF is protected and managed in accordance with the Pacific Bald Eagle Recovery Plan (USDI FWS 1986), and Standards and Guidelines 4-3 and 4-4 of the Siskiyou National Forest Land and Resource Management Plan (USDA 1989). As part of the recovery plan, key nesting habitat areas have been identified on the Rogue River-Siskiyou NF along the Rogue, Illinois, and Sixes Rivers (USDI FWS 1986).

Osprey are closely associated with open water (lakes, rivers, and streams). It breeds in the Forest's major habitat types but only when adjoining open water. Osprey are regularly observed along the major rivers across the Forest.

Motorized use minimally occurs in proximity to large open water or major rivers. Motorized use designation would not impact nest trees. Bald eagles and osprey are often seen in proximity to

human inhabited areas and impacts from disturbance are not anticipated. As such, no adverse impact is expected. No further discussion is being made in this analysis.

d. Cumulative Effects
Present and foreseeable future actions that may affect MIS species or habitats on the Forest include: wildland fire, fuels treatments, livestock grazing, dam maintenance, minerals management, developed and dispersed recreation, timber harvest and vegetation treatments, reforestation, restoration, road management, and special uses. All of these activities will be designed to meet the direction provided within the Northwest Forest Plan and the local Land and Resource Management Plans (i.e., Forest Plans), and in accord with Aquatic Conservation Strategy objectives (NWFP 1994, Rogue River NF LRMP 1990, and Siskiyou NF LRMP 1989). None of the alternatives would result in substantial direct or indirect adverse effects to MIS species. Thus, implementation of the project is not expected to result in detrimental cumulative effects to wildlife MIS species or habitat.

All routes that are being considered for designation within the alternatives of this project currently exist and are receiving some amount of use. Further, it is assumed that because of this existing use, regardless of which alternative is selected, detrimental effects to terrestrial wildlife MIS habitat and populations from the motorized route network would either be reduced or maintained when compared to the current condition.

Will motorized vehicle use designation affect Survey and Manage terrestrial wildlife species or neotropical birds?
Special species considered include Survey and Manage Species, flammulated owl, great gray owl, pygmy nuthatch, and Oregon red tree vole, and habitat for neotropical migratory birds.

Survey and Manage Species

Background
In 2001 the Northwest Forest Plan Survey and Manage standards and guidelines were amended by the Forest Service and BLM ("the agencies") in January 2001 through the signing of a Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (FS & BLM 2001 ROD). The 2001 amendment added clarity, removed duplication, and increased or decreased levels of management for specific species based on new information affecting the level of concern for their persistence. The 2001 ROD identified some categories of species that require site-specific, pre-disturbance surveys to be conducted prior to signing NEPA decisions for habitat disturbing activities. Habitat disturbing activities are defined as “those disturbances likely to have a significant negative impact on the species’ habitat, its life cycle, microclimate, or life support requirements (p.22 FS & BLM 2001)”. For more information on all Survey and Manage species please visit the Survey and Manage Website (http://www.blm.gov/or/plans/surveyandmanage/).

The RRSNF travel management plan is not a habitat disturbing activity in that no new activities are being proposed that are not already occurring as part of the existing condition. There are no

new roads being built, nor new play areas being developed, rather these existing disturbances are being proposed to be officially designated as part of the RRSNF existing road, trail and motorized recreation system. IN addition, under the preferred alternative, there will be an overall reduction in the mile of trails and roads available for use and the entire Forest will prohibit of road use for big game retrieval. This should benefit all S&M species as there will be les disturbance and lees potential for direct effects to all species. As there are no habitat disturbing activities being proposed, no pre-disturbance surveys were conducted for species listed under the 2001 ROD that occur on the RRSNF. However, there are still some potential impacts to Survey and Manage species that occur on the RRSNF, and those impacts are described below. The additional species on the 2001 ROD vertebrate and invertebrate species list do not occur on the Forest and are not discussed as part of this analysis.

Known sites of survey and manage species would be managed on a species by species basis based upon the habitat requirements of the species.

Table 5. Survey and Manage Terrestrial Species that occur or are suspected on the Rogue River-Siskiyou NF.

Name and Geographic Area	Common Name	Rogue River-Siskiyou NF	Conduct Surveys?	Manage known sites?
Plethodon Stormi, In North Range	Siskiyou Mountains Salamander	Documented	No	Yes
Strix Nebulosa	Great Gray Owl	Documented	Yes	Yes
Arborimus Longicaudus	Oregon Red Tree Vole	Documented	Yes	Yes
Deroceras Hesperium	Evening Fieldslug	Suspected	No	Yes
Fluminicola N. Sp. 3	Klamath Rim Pebblesnail	Suspected	Yes	Yes
Fluminicola N. Sp. 11	Fredenburg Pebblesnail	Suspected	Yes; But Only The Portion Within The Klamath Basin (Species Is Restricted To The Klamath Basin)	Yes
Na	Oregon Megomphix	Documented	No	Manage Sites Prior To FY2000
Monadenia Chaceana	Chace Sideband	Documented	Yes; Rogue River (Applegate Rd, Ashland Rd, Butte Falls Rd, Prospect Rd); Siskiyou (Galice Rd, Illinois Valley Rd)	Yes

Name and Geographic Area	Common Name	Rogue River-Siskiyou NF	Conduct Surveys?	Manage known sites?
Na	Yellow-Base Sideband	Suspected	Yes; Rogue River (Applegate RD), Siskiyou Illinois Valley RD)	Yes
Pristiloma Arcticum Crateris	Crater Lake Tightcoil	Documented	Yes; High Cascades Rd Only	Yes
Prophysaon Coeruleum, In California And Washington	Blue-Gray Taildropper	Documented	Only Survey On The RRSNF Portion That Lies Within CA	Only The Sites In CA

Great Gray Owl (Strix nebulosa)

The Great Gray Owl (GGOW) utilizes a variety of habitats, but on the RRSNF it generally prefers mature mixed conifer stands adjacent to montane meadows, clear-cuts, and in the lower elevations conifer forests near oak woodlands or agricultural lands (Clayton Personal Obs.). The GGOW have been found on the High Cascades and Siskiyou Mountains RDs. Due to the potential of disturbance to nesting owls from noise associated with passenger vehicle and OHV traffic, all alternatives may impact but not adversely impact this species.

Direct, Indirect and Cumulative Effects

GGOW are susceptible to direct effects from vehicle collisions and habitat loss, and are also affected by the indirect effects of habitat fragmentation and increased disturbance associated with roads and vehicle traffic. The prohibition of cross country travel would be a benefit to the GGOW in that some of their preferred foraging habitats (meadows) are often areas where off road OHV use has been the most obvious on the RRSNF (Clayton, personal observation). By closing the Forest, and therefore the majority of the meadows on the RRSNF to cross country travel, there would be less foraging habitat disturbance which could also benefit GGOW prey which utilizes the meadows. The 300 foot dispersed pull off areas in alternatives 2, 3, and 5 intersect with 79 GGOW known detections.

Cumulative effects, including road maintenance, road decommissioning and snow removal would not have an additive effect on the effects of the proposals to GGOWs.

Determination

As there is no habitat disturbing activities occurring as a result of any of the action alternatives, there would be no threat to the habitat or persistence of the Great Gray Owl on the RRSNF. As the camping corridors and pull off areas would not involve any canopy removal or disturbance, and as roadside maintenance is considered “routine maintenance” there would be no buffers applied to the known sites of Great Gray Owls occurring within the camping and road pull off corridors.

Oregon Red Tree Vole (Arborimus longicaudus)

The Oregon red tree vole is found in the majority of mature to old growth mixed conifer stands below 5,000 ft elevation on the RRSNF. It is an arboreal rodent which nests on limbs of larger, older Doug-fir within mixed conifer forests (USDA, USDI 2000). Red tree voles have been found on all Districts on the RRSNF.

Direct, Indirect and Cumulative Effects

Red tree voles (RTVs) are arboreal and nocturnal which therefore makes them much less susceptible to direct effects from becoming road kill. They are susceptible to the indirect effects of landscape fragmentation, landscape permeability and disturbance discussed earlier. Their preferred habitats of closed canopy, older forests are unlikely experiencing disturbance due cross country travel currently due to the infeasibility of OHV's being able to drive through their habitats, but there would be benefit of reduced disturbance across the Forest due to the restrictions on big game retrieval with suitable RTV habitat. Dispersed camping areas in the preferred alternative are within 300 feet of 511 known RTV nest sites, These sites would be subject to disturbance associated with driving and camping, but are not likely to be subject to habitat impacts in that the nest trees would remain on site. Cumulative effects of ongoing road maintenance would not be additive in its effects to the RTV as it would be occurring irregardless if this project is implemented.

Determination

As there are no habitat disturbing activities that will occur as a result of any of the action alternatives, there would be no threat to the persistence of the red tree vole on the RRSNF. As the camping corridors and pull off areas would not involve any canopy removal or disturbance, and as roadside maintenance is considered "routine maintenance" there would be no buffers applied to the known sites of red tree vole nests occurring within the camping and road pull off corridors.

Evening Fieldslug (Deroceras hesperium)

The evening fieldslug is found near perennially wet meadows in and amongst forested habitats in microsites that include a variety of low vegetation, wood litter and debris and rocks (Burke and Duncan 2005). This species is only suspected on the forest and has never been documented here.

Direct, Indirect and Cumulative Effects

This species is a low mobility slug for which very little is known. It is always found in wet meadow habitat in and amongst forests, areas in which there have been instances of resource damage from cross country travel in the past. As all action alternatives would prohibit cross country travel, this should limit the chances of direct effects to this species. There are no known sites for this species within any of the camping corridors or road pull off areas in any Alternatives. Cumulative effects of road maintenance should not be additive in its effects for the evening fieldslug because it would occur whether or not this project is implemented.

Determination

As there is no habitat disturbing activities occurring as a result of any of the action alternatives, there would be no threat to the persistence of the evening fieldslug on the RRSNF.

Oregon shoulderband (Helminthoglypta hertlieni)

The Oregon shoulderband is a terrestrial mollusk (snail) associated with talus/rocks and woody debris in dry conifer, mixed conifer/hardwood vegetation types (Weasma and Duncan 2004). During the wet seasons, individuals may be found away from rock refugia, foraging for green vegetation and fruit, feces, old leaves, leaf mold, and fungi (Weasma and Duncan 2004). This species is only known to occur on the High Cascades Ranger District on the RRSNF.

Direct, Indirect and Cumulative Effects

This snail is associated with rocky habitats, and as such, is not likely to be directly impacted by vehicles during dry seasons; however they may be impacted while foraging away from rock outcrops in the wet seasons. Therefore the closure of the Forest to cross country travel would be beneficial for this species by reducing the potential for direct mortality or by altering microclimates by disturbing rocks or downed wood by OHVs. There are several known sites within the road pull off corridors common to all action alternatives. Within these corridors during the wet season, direct mortality could occur to foraging snails by vehicles traveling to campsites or parking areas. These sites will confirmed and closed if excessive mortality could occur. Cumulative effects of ongoing road maintenance should not be additive in its effect to this species as it would occur whether or not this project is implemented.

Determination

As there is no habitat disturbing activities occurring as a result of any of the action alternatives, there would be no threat to the persistence of the Oregon shoulderband on the RRSNF. Any known sites that occur within the parking pull off areas are buffered by one site potential tree (150ft) and would be marked as unavailable for camping and parking on the MVUM. The site potential tree buffer would maintain the microsite conditions of talus, rocks and downed wood that are utilized by this species.

Chace sideband (Monadenia chaceana)

The chace sideband is a terrestrial mollusk (snail) associated with dry conifer and mixed conifer/hardwood forests and open talus or rocky areas (Weasma and Duncan 2005). During the wet seasons, individuals may be found away from rock refugia, foraging for green vegetation and fruit, feces, old leaves, leaf mold, and fungi (Weasma and Duncan 2005). This species is known to occur on the North RRSNF, on the high cascades RD. 17 sites are known for the RD and all will be confirmed and protected if in an area that could result in mortality.

Direct, Indirect and Cumulative Effects

This snail is associated with rocky habitats, and as such, is not likely to be directly impacted by vehicles during dry seasons; however they may be impacted while foraging away from rock outcrops in the wet seasons. Therefore the closure of the Forest to cross country travel would be beneficial for this species by reducing the potential for direct mortality or by altering microclimates by disturbing rocks or downed wood by OHVs. Within these corridors during the wet season, direct mortality could occur to foraging snails by vehicles traveling to campsites or parking areas. Cumulative effects of ongoing road maintenance should not be additive in its effect to this species as it would occur whether or not this project is implemented.

Determination
As there is no habitat disturbing activities occurring as a result of any of the action alternatives, there would be no threat to the persistence of the chace sideband on the RRSNF. The 17 sites occurring within the camping corridors and pull off areas are buffered by one site potential tree (150 ft) and would be marked as areas of no camping/parking on the MVUM. This would protect the species microhabitat conditions.

Crater Lake Tightcoil (Pristiloma arcticum crateris)

The Crater Lake tightcoil is a small (2.75 mm diameter) mostly aquatic mollusk found in perennially moist areas in conifer forests and meadows among rushes, mosses and other surface vegetation, or under rocks and woody debris within 10m of perennially open water (Burke and Gowan 2005). Movement of this species is believed to be mostly passive; as adults and eggs may be carried by mud particles by vertebrates such as waterfowl or ungulates (Burke and Gowan 2005). Their habitats are often snow covered for much of the winter months due to the elevations at which they are found. This species has only been found on the High Cascades Ranger District on the RRSNF.

Direct, Indirect and Cumulative Effects
This species is associated with perennially wet habitats where cross country travel is not likely to currently occur. However, there is a chance that some cross country travel could be impacting this species as they can occur as far as 10m away from water, so the prohibition of all cross country travel should be a benefit for this species. Being that no resource damage would be allowed within these camping corridors, and that this species is found within perennially moist habitats, this habitat should be not be impacted. Cumulative effects of ongoing road maintenance should not be additive in its effect to this species as it would occur whether or not this project is implemented.

Determination
As there is no habitat disturbing activities occurring as a result of any of the action alternatives, there would be no threat to the persistence of Crater Lake tightcoil on the RRSNF. There are no known sites within a camping corridor.

Flammulated Owl

This species is closely associated with the mixed forest habitat type but it requires ponderosa pine in its habitat. This species is closely associated with multi-story, moderate-closed canopy structural conditions. There would be no effect to canopies of mixed or ponderosa pine forests or habitat under any alternative. Due to the potential of disturbance to nesting owls from noise associated with passenger vehicle and OHV traffic, all alternatives may impact but not adversely impact this species.

Pygmy Nuthatch

This species is associated with the Forest's habitat types and is considered to require ponderosa pine as a habitat component. This species is present within the Forest. Due to the potential of disturbance to the nuthatch from noise associated with passenger vehicle and OHV traffic, all alternatives may impact but not adversely impact this species.

Neotropical Migratory Birds

The Migratory Bird Treaty Act of 1918 (MBTA).

The MTBA Implements various treaties and conventions between the U.S., Canada, Japan, Mexico and the former Soviet Union for the protection of migratory birds. Under the act, it is unlawful to pursue, hunt, take, capture (or kill) a migratory bird except as permitted by regulation (16 U.S.C. 703-704). The regulations at 50 CFR 21.11 prohibit the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, or possessing migratory birds, including nests and eggs, except under a valid permit or as permitted in the implementing regulations (Director's Order No. 131). A migratory bird is any species or family of birds that live, reproduce or migrate within or across international borders at some point during their annual life cycle.

The U.S. Fish and Wildlife Service (FWS) is the lead federal agency for managing and conserving migratory birds in the United States; however, under Executive Order (EO) 13186 all other federal agencies are charged with the conservation and protection of migratory birds and the habitats on which they depend. In response to this order, the BLM and Forest Service have implemented management guidelines that direct migratory birds to be addressed in the NEPA process when actions have the potential to negatively or positively affect migratory bird species of concern.

Executive Order 13186 (66 Fed. Reg. 3853, January 17, 2001)

"Responsibilities of Federal Agencies to Protect Migratory Birds"

This Executive Order directs federal agencies to avoid or minimize the negative impact of their actions on migratory birds, and to take active steps to protect birds and their habitat. This Executive Order also requires federal agencies to develop Memorandum of Understandings (MOU) with the FWS to conserve birds including taking steps to restore and enhance habitat, prevent or abate pollution affecting birds, and incorporating migratory bird conservation into agency planning processes whenever possible. The BLM and FS have both completed, and are currently implementing, their respective MOU's with the FWS.

BLM & FWS MOU, April 12, 2010

The purpose of the MOU is, "*to strengthen migratory bird conservation by identifying and implementing strategies that promote conservation and avoid or minimize adverse impacts on migratory birds through enhanced collaboration between the BLM and the Fish and Wildlife Service and in coordination with state, tribal, and local governments.*"

Following are provisions of the MOU that relate specifically to planning and NEPA compliance.

Under the MOU the BLM Shall:

- *Maintain or update current policy guidance regarding management of migratory birds and their habitat pursuant to the MBTA and Executive Order 13186.*

- *Address the conservation of migratory bird habitat and populations when developing, amending, or revising management plans for BLM lands, consistent with the Federal Land Policy and Management Act, Endangered Species Act, and other applicable law. When developing the list of species to be considered in the planning process,* ***BLM will consult the current (updated every 5 years) FWS Species of Concern lists.***

- *At the project level, evaluate the effects of the BLM's actions on migratory birds during the NEPA process, if any, and identify where take reasonably attributable to agency actions may have a measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. In such situations, BLM will implement approaches lessening such take.*

- *Work with Federal and non-Federal partners such as the Strategic Habitat Conservation partnership and Joint Ventures to integrate migratory bird and habitat conservation into BLM planning efforts.*

- *Integrate migratory bird conservation measures, as applicable, into future Activity Management Planning (Grazing, Recreation, Cultural Resources, Wildlife, etc.), surface operating standards and guidelines for oil and gas exploration and development, and renewable (wind, solar, and geothermal) energy development NEPA mitigation. This will address habitat loss and minimize negative impacts.*

Forest Service & FWS MOU:

The purpose of this MOU is, *"to strengthen migratory bird conservation by identifying and implementing strategies that promote conservation and avoid or minimize adverse impacts on migratory birds through enhanced collaboration between the Parties, in coordination with State, Tribal, and local governments."*

Under the MOU the FS Shall:

Address the conservation of migratory bird habitat and populations when developing, amending, or revising management plans for national forests and grasslands, consistent with NFMA, ESA, and other authorities listed above. When developing the list of species to be considered in the planning process, ***consult the current (updated every 5 years) FWS Birds of Conservation Concern, 2008 (BCC)****, State lists, and comprehensive planning efforts for migratory birds.*

Within the NEPA process, evaluate the effects of agency actions on migratory birds, focusing first on species of management concern along with their priority habitats and key risk factors. To the extent practicable:

a. Evaluate and balance long-term benefits of projects against any short- or long- term adverse effects when analyzing, disclosing, and mitigating the effects of actions.

b. Pursue opportunities to restore or enhance the composition, structure, and juxtaposition of migratory bird habitats in the project area.

c. Consider approaches, to the extent practicable, for identifying and minimizing take that is incidental to otherwise lawful activities, including such approaches as:
1. altering the season of activities to minimize disturbances during the breeding season;
2. retaining snags for nesting structures where snags are underrepresented;
3. retaining the integrity of breeding sites, especially those with long histories of use and;
4. giving due consideration to key wintering areas, migration routes, and stop-over habitats.
5. minimizing or preventing the pollution or detrimental alteration of the environments utilized by migratory birds whenever practical by assessing information on environmental contaminants and other stressors relevant to migratory bird conservation.

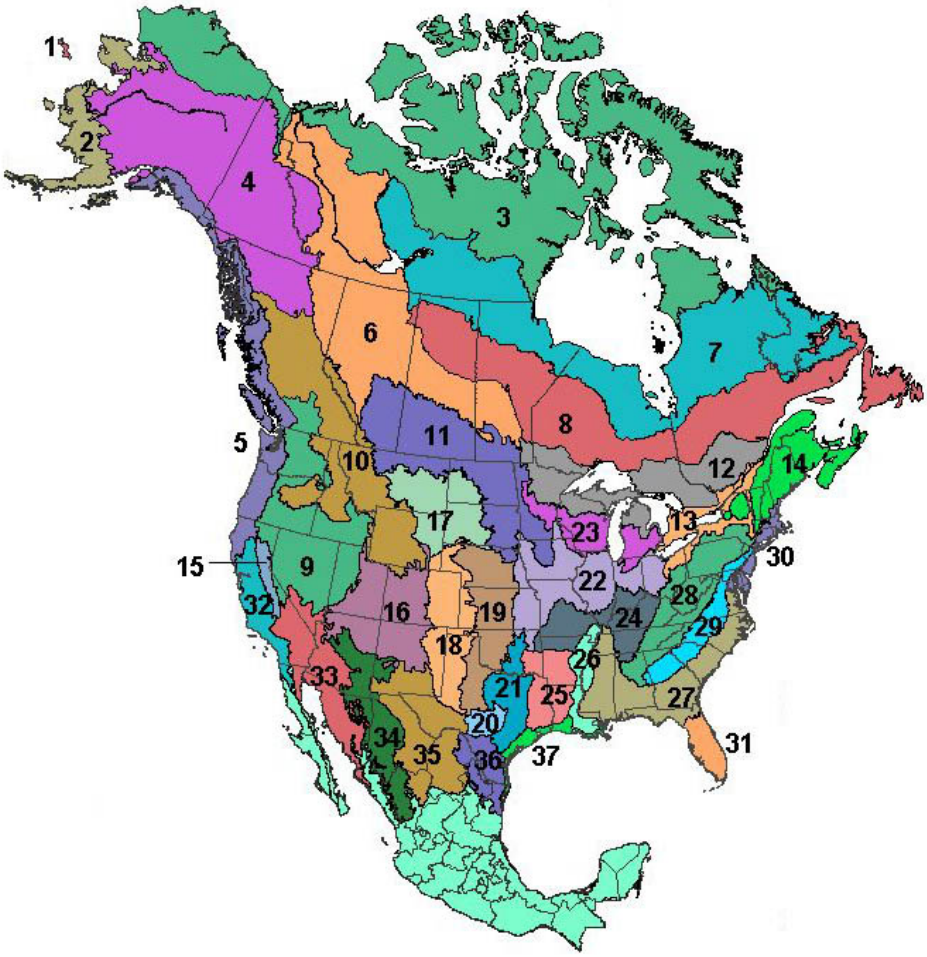
PIF Bird Conservation Regions (BCR'S)

Bird Conservation Regions (BCRs) are ecologically distinct regions in North America with similar bird communities, habitats, and resource management issues. BCR's are a hierarchical framework of nested ecological units delineated by the Commission for Environmental Cooperation (CEC). The CEC framework comprises a hierarchy of 4 levels of eco-regions. At each spatial level, spatial resolution increases and eco-regions encompass areas that are progressively more similar in their biotic (e.g., plant and wildlife) and abiotic (e.g., soils, drainage patterns, temperature, and annual precipitation) characteristics.

A mapping team comprised of members from United States, Mexico, and Canada assembled to develop a consistent spatial framework for bird conservation in North America. The team's US members met in to apply the framework to the United States and developed a proposed map of BCRs. The map was presented to and approved by the US North American Bird Conservation Initiative (NABCI) Committee during its November 1999, meeting. The map is a dynamic tool. Its BCR boundaries will change over time as new scientific information becomes available. It is expected that the map will be updated every three years. More information on BCR's can be found at http://www.nabci-us.org/bcrs.htm

The overall goal of these BCR lists are to accurately identify the migratory and resident bird species (beyond those already designated as federally threatened or endangered) that represent our highest conservation priorities.

BCR lists are updated every 5 years by the US Fish and Wildlife Service.



The Birds of Conservation Concern 2008- (updated every 5 years)

In December, 2008, the U.S. Fish and Wildlife Service released The Birds of Conservation Concern Report (BCC) which identifies species, subspecies, and populations of migratory and resident birds not already designated as federally threatened or endangered that represent highest conservation priorities and are in need of additional conservation actions.

While the bird species included in *BCC 2008* are priorities for conservation action, this list makes no finding with regard to whether they warrant consideration for Endangered Species Act (ESA) listing. The goal is to prevent or remove the need for additional ESA bird listings by implementing proactive management and conservation actions. It is recommended that these lists be consulted in accordance with Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds." In the BLM and FWS MOU, both parties shall: *Work collaboratively to identify and address issues that affect species of concern, such as migratory bird species listed in the Birds of Conservation Concern (BCC) and FWS's Focal Species initiative. (BLM and FWS MOU, 2012, Section VI, page 4).*

This report should also be used to develop research, monitoring, and management initiatives. *BCC 2008* is intended to stimulate coordinated and collaborative proactive conservation actions among Federal, State, Tribal, and private partners. The hope is that, by focusing attention on these highest-priority species, this report will promote greater study and protection of the habitats and ecological communities upon which these species depend, thereby contributing to healthy avian populations and communities.

BCR 5 (Northern Pacific Forest U.S. portions only).

Yellow-billed Loon (nb)
Western Grebe (nb)
Laysan Albatross (nb)
Black-footed Albatross (nb)
Pink-footed Shearwater (nb)
Red-faced Cormorant
Pelagic Cormorant (*pelagicus* ssp.)
Bald Eagle (b)
Northern Goshawk (*laingi* ssp.)
Peregrine Falcon (b)
Black Oystercatcher
Solitary Sandpiper (nb)
Lesser Yellowlegs (nb)
Whimbrel (nb)
Long-billed Curlew (nb)
Hudsonian Godwit (nb)
Marbled Godwit (nb)
Red Knot (*roselaari* ssp.) (nb)
Short-billed Dowitcher (nb)
Aleutian Tern
Caspian Tern
Arctic Tern
Marbled Murrelet (c)
Kittlitz's Murrelet (a)
Black Swift
Rufous Hummingbird
Allen's Hummingbird
Olive-sided Flycatcher
Willow Flycatcher (c)
Horned Lark (*strigata* ssp.) (a)
Oregon Vesper Sparrow (*affinis* ssp.)
Purple Finch

(a) ESA candidate, (b) ESA delisted, (c) non-listed subspecies or population of Tor E species, (d) MBTA protection uncertain or or coastallacking, (nb) non-breeding in this BCR. **All oceanic
Or coastal

Avian Conservation Planning: (Migratory and Resident Birds):

Migratory birds are those that breed in the U.S. and winter south of the border in Central and South America. Many of our well known passerine songbirds, flycatchers, vireos, swallows, thrushes, warblers, and hummingbirds, fall in this category. Most others are included in the resident category. Birds are a vital element of every terrestrial habitat in North America. Conserving habitat for birds will therefore contribute to meeting the needs of other wildlife and entire ecosystems (Partners In Flight Continental Plan). Continent-wide declines in population trends for many avian species has developed into an international concern and led to the creation of the North American Bird Conservation Initiative (NABCI). Under this initiative, plans have been developed for the conservation of waterbirds, shorebirds, seabirds and landbirds. The landbird initiative known as Partners-In-Flight (PIF) has developed a series of bird conservation plans for every state. PIF has gained wide recognition as a leader in the landbird conservation arena.

The Oregon and Washington Chapter of PIF was formed in 1992 and has since developed a series of publications aimed at assisting private, state, tribal and federal agencies in managing for landbird populations. The most recent and applicable publications for the two state area have been Conservation Plans for landbirds.

PIF Bird Conservation Plans:

Five conservation plans have been developed by PIF covering the various geographic regions found in Oregon and Washington. These documents have been prepared to stimulate and support a proactive approach to the conservation of landbirds throughout Oregon and Washington. They represent the collective efforts of multiple agencies and organizations within Oregon and Washington. Participants included biologists from federal and state agencies, industry, private consulting firms, environmental organizations, and academia in order to ensure a full range of ideas and practicalities were addressed by the plans.

Recommendations included in the documents are intended to inform planning efforts and actions of land managers, and stimulate monitoring and research to support landbird conservation. The recommendations are also expected to serve as a foundation for developing detailed conservation strategies at multiple geographic scales to ensure functional ecosystems with healthy populations of landbirds.

The plans can be found on the OR-WA PIF web site at **www.orwapif.org**

- Conservation Strategy for Landbirds in Coniferous Forest of Western Oregon and Washington
- Conservation Strategy for Landbirds in Lowlands and Valleys of Western Oregon and Washington, Version 2

The overall goal of PIF Bird Conservation Planning is to ensure long-term maintenance of healthy populations of native landbirds. These documents are intended to facilitate that goal by identifying conditions and habitat attributes important to the landbird community, describing the desired landscape based on habitat relationships of a select group of species, providing interim management targets (i.e., biological objectives) to achieve desired conditions, and recommending management actions (i.e., conservation options) that can be implemented by various entities at multiple scales to achieve the biological objectives.

Implementation of parts or all of the strategy should help prevent reactionary approaches typically needed to address listed species issues. When these ecosystem-driven conservation strategies are fully implemented at large geographic scales, the aggregated effect will be the creation of landscapes that should function to conserve landbird communities.

The strategy for achieving functioning ecosystems for landbirds is described through the habitat requirements of **"focal species".** By managing for a group of species representative of important components in a functioning coniferous forest ecosystem, many other species and elements of biodiversity also will be conserved. E.O. 13186 and the MOUs signed by the FS and BLM with the FWS requires agencies to incorporate migratory bird conservation into agency planning processes whenever practicable. The PIF plans assist federal agencies in achieving this direction.

PIF Bird Conservation Regions (BCR'S)

Bird Conservation Regions (BCRs) are ecologically distinct regions in North America with similar bird communities, habitats, and resource management issues. BCR's are a hierarchical framework of nested ecological units delineated by the Commission for Environmental Cooperation (CEC). The CEC framework comprises a hierarchy of 4 levels of eco-regions. At each spatial level, spatial resolution increases and eco-regions encompass areas that are progressively more similar in their biotic (e.g., plant and wildlife) and abiotic (e.g., soils, drainage patterns, temperature, and annual precipitation) characteristics.

More information on BCR's can be found at http://www.nabci-us.org/bcrs.htm
The overall goal of these BCR lists are to accurately identify the migratory and resident bird species (beyond those already designated as federally threatened or endangered) that represent our highest conservation priorities.

BCR lists are updated every five years by the US Fish and Wildlife Service.

The Birds of Conservation Concern 2008- (updated every 5 years)

In December, 2008, the U.S. Fish and Wildlife Service released The Birds of Conservation Concern Report (BCC) which identifies species, subspecies, and populations of migratory and resident birds not already designated as federally threatened or endangered that represent highest conservation priorities and are in need of additional conservation actions.

While the bird species included in *BCC 2008* are priorities for conservation action, this list makes no finding with regard to whether they warrant consideration for Endangered Species Act (ESA) listing. The goal is to prevent or remove the need for additional ESA bird listings by implementing proactive management and conservation actions. It is recommended that these lists be consulted in accordance with Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds." In the BLM and FWS MOU, both parties shall: *Work collaboratively to identify and address issues that affect species of concern, such as migratory bird species listed in the Birds of Conservation Concern (BCC) and FWS's Focal Species initiative. (BLM and FWS MOU, 2012, Section VI, page 4).*

BCR 5 (Northern Pacific Rain Forest, U.S. portions only)

Bird Species	Preferred Habitat
Yellow-billed Loon	Winters along the coast from AK to Baja CA. Transients can be found on inland bodies of water.
Godwit (nb) non-breeding in this BCR	Prefer coastal mudflats, sandy ocean beaches, wet margins of large reservoirs or brackish lakes and sewage ponds.
Red Knot (*roselaari ssp*.) (nb) non-breeding in this BCR)	Found along the coast foraging in open estuarine tide flats, inland on margins of sewage ponds & at larger brackish lakes.
Short-billed Dowitcher (nb) non-breeding in this BCR	A bird of wet mud or shallow water with underlying mud. Common in tidal mudflats and adjacent shallow water.
Aleutian Tern	Primarily pelagic, coming to land only to nest and roost.
Caspian Tern	Found in marine, coastal estuarine, salt marsh brackish and freshwater habitats near large bodies of water. Often nests on islands in rivers and salt lakes.
Arctic Tern	Found offshore migrating along the coast, rarely near land.
Marbled Murrelet	Found in nearshore (within 5 km) waters and within 50 miles inland in old growth forest stands.
Kittlitz's Murrelet	Alaskan species.
Black Swift	Nests on ledges or shallow caves in steep rock faces and canyons, usually near or behind waterfalls and sea caves. Forage over forests and open areas in montane habitats.
Rufous Hummingbird	Found in a variety of habitats, most likely in brushy areas with flowers and forests with a well-developed understory.
Allen's Hummingbird	Found in narrow, moist coastal fog zones in open areas of coastal scrub. Nest in nearby wooded areas.
Olive-sided Flycatcher	Open conifer forests (< 40 % canopy cover) and edge habitats where standing snags and scattered tall trees remain after a disturbance.
Willow Flycatcher (c) non-listed subspecies or population of T or E species.	Associated with riparian shrub dominated habitats, especially brushy/willow thickets. In SE WA also found in xeric brushy uplands.
Horned Lark (*strigata ssp*.)	Open fields with short herb dominated ground cover < 31 cm tall and patches of bare ground.

Bird Species	Preferred Habitat
(a) ESA candidate	
Oregon Vesper Sparrow (*affinis* ssp.)	Lightly grazed pastures with scattered shrubs and grass height < 30-60 cm) high & young (2-5 yr) x-mass tree farms with grass between the rows.
Western Grebe (nb) (nb) non-breeding in this BCR	Marshes with open water and on lakes and reservoirs supporting emergent vegetation.
Laysan Albatross (nb) (nb) non-breeding in this BCR	Pelagic, far offshore seabird
Black-footed Albatross (nb) (nb) non-breeding in this BCR	Pelagic, far offshore seabird
Pink-footed Shearwater (nb) (nb) non-breeding in this BCR	Pelagic offshore seabird
Red-faced Cormorant	Alaskan species
Pelagic Cormorant (*pelagicus* ssp.)	Year round nearshore marine and estuarine habitats, on ledges and vertical cliffs, on rocky islands and headlands.
Bald Eagle (b) ESA delisted	Associated with large bodies of water, forested areas near the ocean, along rivers, and at estuaries, lakes and reservoirs.
Northern Goshawk (*laingi* ssp.)	A habitat generalist that prefers to nest in mature forests with large trees on moderate slopes with open understories.
Peregrine Falcon (b) ESA delisted	Wide range of habitats, nests on cliff ledges, bridges, quarries.
Black Oystercatcher	Rocky shores and sand/gravel beaches along the coast.
Solitary Sandpiper (nb) non-breeding in this BCR	Small and partly wooded patches of water, and high altitude bogs and wet meadows
Lesser Yellowlegs (nb) non-breeding in this BCR	Migrates through east of the Cascade crest. A wader of shallow pools often found near mudflats on seasonally flooded fields and small isolated ponds.
Whimbrel (nb) non-breeding in this BCR	Migrating through coastal estuarine mud flats and on sandy ocean beaches. Inland on fields or mud flats around lakes and ponds.
Long-billed Curlew (nb) non-breeding in this BCR	Short-grass or mixed-prairie habitats with flat to rolling topography. Also found in agricultural fields.
Hudsonian Godwit (nb) non-breeding in this BCR	Rare migrant along the west coast.

(a) ESA candidate, (b) ESA delisted, (c) non-listed subspecies or population of Tor E species, (d) MBTA protection uncertain or lacking, (nb) non-breeding in this BCR.

Avian Conservation Planning: (Migratory and Resident Birds):

Migratory birds are those that breed in the U.S. and winter south of the border in Central and South America. Many of our well known passerine songbirds, flycatchers, vireos, swallows, thrushes, warblers, and hummingbirds, fall in this category. Most others are included in the resident category. Birds are a vital element of every terrestrial habitat in North America. Conserving habitat for birds will therefore contribute to meeting the needs of other wildlife and entire ecosystems (Partners In Flight Continental Plan). Continent wide declines in population trends for many avian species has developed into an international concern and led to the creation of the North American Bird Conservation Initiative (NABCI). Under this initiative, plans have been developed for the conservation of waterbirds, shorebirds, seabirds and landbirds. The landbird initiative known as Partners-In-Flight (PIF) has developed a series of bird conservation plans for every state. PIF has gained wide recognition as a leader in the landbird conservation arena.

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Recommendations included in the documents are intended to inform planning efforts and actions of land managers, and stimulate monitoring and research to support landbird conservation. The recommendations are also expected to serve as a foundation for developing detailed conservation strategies at multiple geographic scales to ensure functional ecosystems with healthy populations of landbirds.

The plans can be found on the OR-WA PIF web site at **www.orwapif.org**

- Conservation Strategy for Landbirds in Coniferous Forest of Western Oregon and Washington
- Conservation Strategy for Landbirds in Lowlands and Valleys of Western Oregon and Washington, Version 2

The overall goal of PIF Bird Conservation Planning is to ensure long-term

maintenance of healthy populations of native landbirds.

The strategy for achieving functioning ecosystems for landbirds is described through the habitat requirements of **"focal species".** By managing for a group of species representative of important components in a functioning coniferous forest ecosystem, many other species and elements of biodiversity also will be conserved. E.O. 13186 and the MOUs signed by the FS and BLM with the FWS requires agencies to incorporate migratory bird conservation into agency planning processes whenever practicable. The PIF plans assist federal agencies in achieving this direction. Bird Conservations Regions (BCRs) were developed based on similar geographic parameters. One BCR encompasses the project area, BCR 5. The following table displays the BCC species for this area, preferred habitat and whether suitable habitat is present in the project area.

Bird Conservation Region (BCR) 5 – Northern Pacific Rainforest

USFWS Birds of Conservation Concern (BCC) found in the planning area.

Bird Species	Preferred Habitat
Northern Goshawk	Mature forests with larger trees; relatively closed canopies; and open understories
Peregrine falcon and bald eagle	Cliffs and large trees
Olive-sided Flycatcher	natural or man-made openings with tall trees or snags
Rufous Hummingbird	Forest edges and openings with a diversity of flowering plants
Band-tailed pidgeon	Nest primarily in closed Douglas-fir stands with canopy cover above 70 percent. Key food sources include red elder, cascara and other berry, fruit and mast producing shrubs and trees. Mineral springs/seeps are important and provide essential calcium for nesting.
Purple Finch	Moderately moist open or semi open coniferous forests

BCC species for this area, preferred habitat and whether suitable habitat is present in the project area

Species	General Habitat Requirements	Impacts to Habitat	
		No Action and alt 3	Alternatives 2,4,5
GAME BIRDS			
Band-tailed Pigeon *(Columba fasciata)*	Nest primarily in closed Douglas-fir stands with canopy cover above 70 percent. Key food sources include red elder, cascara and other berry, fruit and mast producing shrubs and trees. Mineral springs/seeps are important and provide essential calcium for nesting.	No change	less disturbance from closing off road riding across the Forest would have a beneficial effect on this species.
BIRDS OF CONSERVATION CONCERN (BCC)			
Olive-sided Flycatcher *(Contopus cooperi)*	Associated with natural or man-made openings with tall trees or snags available for perching and singing. In the Oregon Coast Range, closely associated with edges of older stands with tall trees and snags greater than 21 inches diameter breast height and broken canopy. Conditions are generally absent within the proposed thinning units but often present in adjacent or nearby older stands.	No change	less disturbance from closing off road riding across the Forest would have a beneficial effect on this species
Rufous Hummingbird *(Selasphorus rufus)*	Primarily associated with forest edges and openings with a diversity of flowering plants for feeding and open space Frequently occurs in open habitats that are shrub-dominated, and late-successional forest with a highly developed and diverse understory of herbaceous plants and shrubs, particularly within large openings. Need flowering plants and shrubs.	No change	less disturbance from closing off road riding across the Forest would have a beneficial effect on this species
Northern Goshawk *(Accipiter gentillis)*	Nests in mature forests with larger trees; relatively closed canopies; and open understories. Average patch size of the core nest area varies based on available habitat conditions, 74 acres found by	No change	less disturbance from closing off road riding across the Forest would have a beneficial effect on this species

Species	General Habitat Requirements	Impacts to Habitat	
		No Action and alt 3	Alternatives 2,4,5
	McGrath et al. (2003) in northeastern Oregon and central Washington.		
Purple Finch *(Carpodacus purpureus)*	Breeds primarily in moderately moist open or semi open coniferous forests. Also frequently found in mixed coniferous-deciduous forest, edges of bogs, and riparian corridors at low to mid-elevations. In Klamath Eco region, the presence of Ponderosa Pine and oak provide a unique habitat component.	No change	less disturbance from closing off road riding across the Forest would have a beneficial effect on this species habitats.
EAGLEs			
Golden Eagle *(Aquila chrysaetos)*	Associated with open and semi-open habitats. Nest on cliffs, in the upper one-third of deciduous and coniferous trees, or on artificial structures (e.g. artificial nesting platforms, electricity transmission towers, windmills). On the Roseburg District, primarily documented to nest in large conifer trees within late-seral forests near open habitats (e.g. meadows, valleys, and clearcuts)	No change	less disturbance from closing off road riding across the Forest would have a beneficial effect on this species

Authorities:

The Memorandums of Understandings between the USFWS, the Forest Service and the Bureau of Land management are entered under the provisions of the following statutes and executive orders:

- Alaska National Interest Lands Conservation Act of 1980 (16 USC 3101 et seq.)
- Bald and Golden Eagle Protection Act of 1940 (16 U.S.C. 668-668d)
- Endangered Species Act of 1973 (16 U.S.C. 1531-1544)
- Federal Land and Policy Management Act of 1976 (43 U.S.C. 1701 et seq.)
- Fish and Wildlife Act of 1956 (16 U.S.C. 742a et seq.)

- Fish and Wildlife Conservation Act of 1980 (16 U.S.C. 2901 et seq.)
- Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661-667)
- Migratory Bird Conservation Act (16 U.S.C. 715 et seq.)
- Migratory Bird Treaty Act of 1918 (16 U.S.C. 703 et seq.)
- Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-531)
- National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.)
- National Forest Management Act of 1976 (16 U.S.C. 1600 et seq.)
- Public Rangelands Improvement Act of 1978 (43 U.S.C. 1901 et. seq.)
- Responsibilities of Federal Agencies to Protect Migratory Birds, Exec. Order No. 13186, 66 Fed. Reg. 3853 (2001)
- Sikes Act of 1960 (16 USC 670a-670o)

Most of these birds are either oceanic or coastal and there is no habitat for birds of concern except for those that are snag dependent. There will be no changes to snags or down wood under any alternative. The Forest believes that these recommendations will be sufficient to maintain viability of the few species of birds of concern known for the planning area and forest.

OHV trail development could create possible adverse impacts on nesting success and abundance of breeding bird via disturbance. Areas within 100 meters of OHV trails may provide reduced-quality habitat to nesting songbirds, particularly for species that suffer substantial losses of annual fecundity due to abandonment or desertion of individual breeding attempts. Limitation of OHV trail development in breeding areas of rare or endangered birds could minimize conflicts over land use between recreation and wildlife conservation.

In those areas with reductions in open roads or trails, a beneficial effect on landbird breeding and nesting can be expected. The converse would be true in those areas where Maintenance Level 1 roads are opened to OHV use, in any area with new trails or play areas, and in areas where mixed use is proposed due to increases in traffic, although effects would likely be reduced in areas with already open roads. Due to the potential of disturbance to voles from noise associated with passenger vehicle and OHV traffic, all alternatives may impact, but not adversely impact these species.

c. Cumulative Effects

Present and foreseeable future actions that may affect Threatened, Endangered, special status or Survey and Manage terrestrial wildlife species or habitats on the Forest include: wildland fire, fuels treatments, livestock grazing, dam maintenance, minerals management, developed and dispersed recreation, timber harvest and vegetation treatments, reforestation, restoration, road management, and special uses. All of these activities will be designed to meet the direction provided within the Northwest Forest Plan and the local Land and Resource Management Plans (i.e., Forest Plans), and in accord with Aquatic Conservation Strategy objectives (NWFP 1994, Rogue River NF LRMP 1990, and Siskiyou NF LRMP 1989).

Conclusion
None of the proposed alternatives would result in substantial direct or indirect adverse effects to special or rare and uncommon terrestrial wildlife species or habitats. Thus, implementation of the project is not expected to result in adverse cumulative effects.

All routes that are being considered for designation within the alternatives of this project currently exist and are receiving some amount of use. Further, it is assumed that because of this existing use, regardless of which alternative is selected, adverse effects to special or rare and uncommon terrestrial wildlife species or habitats from the motorized route network would either be reduced or maintained when compared to the current condition.

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Post-Wildfire Logging Hinders Regeneration and Increases Fire Risk
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USDI Fish and Wildlife Service Letter of Concurrence (LOC) for Travel Management

United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Reply To: 8330.I0004(10)
File Name: RSF Travel Management LOC
Tracking Number: 09-1875
Tails #: 13420-2010-I-0004

November 5, 2009

Scott Conroy
Forest Supervisor
Rogue River – Siskiyou National Forest
3040 Biddle Road
Medford, Oregon 97504

Re: Informal Consultation on Travel Management Plan proposed by the Rogue River–Siskiyou National Forest.

Dear Mr. Conroy:

This responds to your September 21, 2009 request for the U.S. Fish and Wildlife Service's (Service) written concurrence for travel management activities proposed by the Rogue River-Siskiyou National Forest (Forest), which may affect, but are not likely to adversely affect the threatened northern spotted owl (*Strix occidentalis caurina*) (spotted owl), threatened marbled murrelet (*Brachyramphus marmoratus*) (murrelet), and designated critical habitat for the spotted owl and the murrelet; and which may affect, but are not likely to adversely affect Gentner's fritillary (*Fritillaria gentneri*), McDonald's rockcress (*Arabis macdonaldiana*) or Cook's lomatium (*Lomatium cookii*). Those activities and the basis for your determination are discussed in your September 21, 2009, Biological Assessment (Assessment) (USDA FS 2009). We received your request for the Service's concurrence regarding these findings on September 24, 2009. This response was prepared in accordance with the implementing regulations for section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1536 *et seq.*) (Act), as amended; and is based on information provided in the Assessment, meetings, e-mail and phone discussions between Service and Forest staff.

INTRODUCTION

As described in the Assessment, the Forest plans to institute a forest-wide access and travel management program. Currently, the all roads which occur on federal lands managed by the Forest (including all roads, off-road areas and trails), are considered open for motorized use unless specifically identified as closed by Forest order. The proposed Travel Management Plan would reverse this situation. Under the new plan, any areas across the Forest not specifically

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identified as open to motorized use would be considered closed to all motorized traffic and any motorized use would be prohibited.

DESCRIPTION OF THE ACTION AREA

The action area has been defined as all areas to be affected directly or indirectly by the federal action and not merely the immediate area involved in the action (50 CFR 402). In this case, the action area includes all treatment units as well as all adjacent areas subject to increased ambient noise levels caused by activities associated with the proposed action.

The proposed projects (actions) are located mostly within the Oregon Klamath and Oregon Western Cascades Physiographic Provinces and to a lesser extent, the California Klamath Province. As described in the Assessment, only those federal lands managed by the Forest were analyzed in association with the proposed action. Forest managed lands occur in nearly complete blocks of federal ownership. Human populations are centered on the cities of Medford, Grants Pass, and Ashland. Private lands comprise approximately 50 percent of all lands within the Rogue River Basin. Private forested lands managed for timber production will typically be harvested between 40 and 60 years of age, in accordance with State Forest Practices Act standards. These lands are typically not expected to provide spotted owl nesting, roosting and foraging habitat, or marbled murrelet nesting habitat. The conversion of intact suitable habitat in the low elevation woodlands and grasslands into pastures, vineyards, orchards, and home sites is increasing throughout the Rogue Valley.

DESCRIPTION OF THE PROPOSED ACTION

The proposed action is described in its entirety in the Assessment (USDA FS 2009), which is herein incorporated by reference. The proposed action includes activities the Forest plans to implement under the Forest Land and Resource Management Plans (LRMP) (USDA FS 1988 and USDA FS 1990), as amended by the Access and Travel Management Record of Decision. As described in the Assessment, the Forest practices adaptive management as described in the Northwest Forest Plan (NWFP) (USDA FS/USDI BLM 1994), which allows minor project variations to meet site-specific conditions or landscape objectives. Therefore, there may be minor deviations in the description of the proposed action over the life span of this proposed action. The Forest will consider potential deviations as being consistent with the analysis provided in the Assessment as long as the following conditions are met:

- Activities comply with the NWFP.
- Proposed action complies with the LRMP (USDA FS 1989 and USDA FS 1990) to which it is tiered.
- Impacts and extent of the proposed action are within parameters of described activities in the Assessment.
- Minor deviations are reviewed by the Level 1 team to ensure impacts to listed species remain the same or less than those described within the Assessment.
- Minimization measures proposed for the proposed action are consistent with the intent and impacts of actions described in this the Assessment.
- Any proposed action impacts are reported to the Service in annual monitoring reports.

If the proposed action cannot be revised to comply with the analysis in the Assessment, or if the Level 1 team cannot reach consensus that the proposed action deviation meets the intent, extent and impacts addressed in the Assessment and response document from the Service, the Forest will initiate additional consultation to comply with the Act.

As detailed in the Assessment the proposed action includes the following activities.

- Approximately 53 miles of trails that are currently open to motorized vehicles would be closed.
- Approximately 10 miles of roads currently closed to all motorized traffic would be converted to motorized trails.
- Off-road vehicles use will be prohibited on 24 miles of roads where mixed use by off-road and highway vehicles currently occurs.
- Mixed use would be allowed on 0.1 mile of road currently open to highway vehicles.
- Up to 1.2 miles of new motorized trail would be constructed.
- The Forest Management Plan would be amended to allow motorized use on an existing trail.

It is our understanding that the Forest's proposed decisions under the new travel management plan to specifically identify areas across the Forest that are already open to motorized use were not analyzed in the Assessment. The Service recommends that the Forest evaluate those decisions under the new plan to determine if consultation is required under section 7 of the Act to address the effects of motorized use on listed species and critical habitat; unless such use has already been the subject of a completed consultation and those effects are part of the environmental baseline.

Project Design Criteria

Project Design Criteria (PDC) are conservation measures developed to reduce impacts to listed species. Conservation measures may include implementation of seasonal restrictions that reduce impacts during critical breeding seasons, retention of known nest trees and/or restricting activities within a certain distance of know sites to reduce impacts of disturbance. Mandatory PDC will be applied to all activities associated with this proposed action. Recommended PDC will be incorporated during project implementation when practical. Detailed descriptions of the PDC are provided in Appendix A.

EFFECTS OF THE ACTION

Spotted Owl

The Forest analyzed potential affects to spotted owl associated with the implementation of the proposed action based upon the impacts to suitable spotted owl NRF and dispersal habitats as well as potential disturbance to spotted owls. The interagency Methodology for the Estimation of Effects to Spotted Owls was utilized to assess potential impacts at the provincial home range, core area, and nest site scales (USDI/USDA 2008).

Effects to Spotted Owl NRF Habitat

As described in the Assessment, construction of 1.2 miles of trail in the Applegate watershed will result in the treatment and maintenance of up to 0.5 acres of spotted owl NRF habitat. The proposed trail would be approximately 36 inches wide and only undergrowth and small trees (less than eight inches) would be removed. The Forest has determined the treating and maintaining of up to 0.5 acres of spotted owl NRF habitat is insignificant and *may affect, is not likely to adversely affect* the spotted owl because:

- Trees that would constitute potential spotted owl nest trees would not be felled.
- This proposed trail occurs within the home range of one spotted owl site but is not within the nest patch or core area of this site.
- The treatment area equals less than one percent of the 126,383 acres of spotted owl NRF habitat within the Applegate watershed (Table 1).

Table 1: Effects to Spotted Owl NRF Habitat.

Section Seven Watershed	Spotted Owl NRF Habitat Baseline	Acres of Spotted Owl NRF Habitat Affected	Percent Spotted Owl NRF Habitat Treated and Maintained
Applegate	126,383	0.5	< 1

For the stated reasons, the Service concurs with the Forest's determination the treating and maintaining of up to 0.5 acres of spotted owl NRF habitat *may affect, is not likely to adversely affect* the spotted owl.

Effects to Spotted Owl Recovery

The spotted owl recovery plan (USDI FWS 2008) consists of 32 recovery actions. Recovery Action 32 recommends actions that "maintain substantially all of the older and more structurally complex multi-layered conifer forests on all federal lands outside of managed owl conservation areas. At the time the Forest completed the Assessment, a common understanding of "older, structurally complex forest" was not available. The Forest and the Service are currently working on developing this understanding. In the interim, the Forest is currently using a process by which "older, structurally complex forest" stands on the Forest can be identified and maintained per the guidance in recovery action 32. As described in the Assessment, this process involves a first tier of geographic information system mapping using the Forest's remote sensed spotted owl habitat layers to identify potential spotted owl NRF habitat on the Forest. If any part of a planned activity proposes to impact spotted owl NRF habitat which may meet the definition of "older, structurally complex forest", forest personnel visit those stands to determine whether or not they meet the Forest's definition of high quality habitat. The proposed trail construction is not within high quality habitat as determined by the Forest biologist.

Effects to Spotted Owls Due to Disturbance

According to the Assessment, the proposed action has the potential to disturb spotted owls which may be utilizing up to 32 acres of un-surveyed spotted owl NRF habitat because the action

occurs within the disturbance distances (Appendix A). None of these acres are located within the home ranges of any known or computer produced spotted owl sites (generated based upon the ITS methodology, USDI/USDA 2008). In addition, Forest biologists have determined these 32 acres lack enough spotted owl NRF habitat within 0.5 miles, making it unlikely that undetected spotted owls would be nesting within the disturbance distances of these acres. The Forest has determined the potential disturbance of spotted owls associated with 32 acres of spotted owl NRF habitat *may affect, is not likely to adversely affect*" the spotted owl due to disturbance because:

- The Forest will implement mandatory PDC that restrict activities during the critical breeding season (Appendix A), or will conduct protocol surveys to ensure spotted owls are not breeding in the area.

In addition, the proposed action is expected to result in an overall reduction of potential disturbance to spotted owls associated with approximately 479 acres of spotted owl NRF habitat by closing up to 53 miles of currently open roads and trails. Disturbance will be reduced within the core areas or nest patches of seven spotted owl known sites on the Gold Beach and Wild Rivers Ranger Districts. A reduction of disturbance resulting from the closure of 34 miles of motorized roads and trails could have a beneficial effect to small mammal/prey, which in turn could also benefit foraging spotted owls. The Forest has determined the overall reduction of disturbance due to the implementation of the proposed action will be beneficial and *may affect, is not likely to adversely affect* the spotted owl.

For the stated reasons, the Service concurs with the Forest's determination that potential disturbance to 32 acres of spotted owl NRF habitat, as well as the reduction of disturbance to approximately 479 acres of spotted owl NRF habitat *may affect, is not likely to adversely affect* the spotted owl.

Marbled Murrelets

According to the Assessment, the proposed action will not modify any suitable habitat for the murrelet. Therefore, according to the Assessment, the Forest anticipates there are no effects to murrelet suitable habitat from the proposed action.

Effects to Murrelets Due to Disturbance

Little detailed information is available concerning the vulnerability of murrelets to disturbance effects. Research on a variety of other bird species suggests such effects are possible (Henson and Grant 1991; Rodgers and Smith 1995). Studies have shown disturbance can affect productivity. Nest abandonment can cause egg and hatchling mortality due to exposure and predation. Disturbance may cause longer periods of incubation, premature fledgling, or nest evacuation; resulting in depressed feeding rates of adults and offspring that could cause reduced body mass or slower growth of nestlings; and cause avoidance of otherwise suitable habitat. In addition, murrelets may be sensitive to disturbance due to their secretive nature and their perceived vulnerability to predation.

Human created noise associated with the proposed actions has the potential to disturb nesting murrelets and negatively affect productivity. Due to the significant lack of disturbance-related information on this species, the Forest assumes any amount of potential disturbance has the potential to result in negative impacts. Therefore, the Forest conservatively considers the project areas associated with the proposed action as occupied unless protocol surveys indicate non-occupancy.

The proposed action includes the conversion of one road which occurs within the Northwest Coast late successional reserve (LSR) RO 256 (USDA FS/USDI BLM 1994), as well as within murrelet critical habitat unit (CHU) OR-07-b. According to the Assessment, implementation of the proposed action has the potential to cause noise disturbance to no more than 72 acres of un-surveyed suitable murrelet habitat within the recommended disturbance distances (see PDC Appendix A). An additional road, proposed for conversion to motorized trails, is located in murrelet survey zone B where murrelets have not been detected during surveys over the last decade. The Forest has determined it is unlikely murrelets use nine acres of suitable murrelet habitat adjacent to this trail and therefore, are not planning to apply seasonal restriction to use of this converted road. This trail does not occur within any LSR, or critical, or occupied habitat for murrelets.

The Forest has determined implementation of the proposed action *may effect, is not likely to adversely affect* the murrelet due to disturbance because:

- Proposed activities associated with the conversion of one level one road which occurs in LSR RO 256 would be implemented outside of the critical breeding season for murrelets (April 1 through August 5). In addition, a daily timing restriction will minimize the potential that adult murrelets will be disturbed when visiting the nest to feed offspring.
- Based on a decade of negative surveys results for murrelets in survey zone B, the Forest believes it is unlikely murrelets occupy nine acres of suitable habitat which occur adjacent to an existing road proposed for conversion to a motorized trail.

For the stated reasons, the Service concurs with the Forest's determination that implementation of the proposed action *may affect, is not likely to adversely affect* the murrelet due to disturbance.

Effects to Listed Plants

McDonald's Rockcress

McDonald's rockcress is known to occur in serpentine areas of southern Curry County, Oregon as well as Del Norte County, California. Within the action area, McDonald's rockcress occurs immediately adjacent to an open road, on a rock outcrop on the road cut slope at a corner along Forest Road 4402. Other individuals are above and below the road, outside of the road prism. According to the Assessment, a small population of a rockcress that appears to be intermediate between Arabis macdonaldiana and Arabis aculeolata occurs adjacent to a closed and blocked-off (level 1) old road in the East Fork Illinois River watershed on the Del Norte County portion of the Wild Rivers Ranger District. The proposed action does not change the status of this road. Off highway vehicle use is currently prohibited and will remain prohibited. All other known McDonald's rockcress sites, known to occur in the action area, do not occur near roads or trails.

According to the Assessment, the proposed action does not include changes to current use patterns within the known range of McDonald's rockcress. There are some roads in serpentine areas of Wild Rivers Ranger District proposed for closure that might be within a potential range of McDonald's rockcress. The closures are expected to have no effect on McDonald's rockcress because it is assumed to not be present; however, if it were present, it is possible that a beneficial effect would result from the closure.

Based on the information provided above, the Forest has determined implementation of the proposed action *may affect, is not likely to adversely affect* McDonald's rockcress in the action area. In addition, the Forest anticipates beneficial effects to McDonald's rockcress may occur as road closures in the action area have the potential to reduce negative impacts to the species.

For the above stated reasons, the Service concurs implementation of the proposed action *may affect, is not likely to adversely affect* McDonald's rockcress.

Gentner's Fritillary

According to the Assessment, there are no specific roads or trails proposed for a change of any kind under the proposed action that are within the known or suspected range of Gentner's fritillary. The Forest has made a determination that the proposed action will have a net beneficial effect to Gentner's fritillary due to a prohibition of motorized vehicle use within suitable habitat for Gentner's fritillary. For this reason, the Forest Service has determined that the proposed action *may affect, is not likely to adversely affect* Gentner's fritillary.

For the above stated reasons, the Service concurs implementation of the proposed action *may affect, is not likely to adversely affect* Gentner's fritillary.

Cook's Lomatium

According to the Assessment, there are no specific roads or trails proposed for a change of any kind under the proposed action that are within the known or suspected range of Cook's lomatium. The Forest has made a determination that the proposed action will have a net beneficial effect to Cook's lomatium due to a prohibition of motorized vehicle use within suitable habitat for Cook's lomatium. For this reason, the Forest Service has determined that the proposed action *may affect, is not likely to adversely affect* Cook's lomatium.

For the above stated reasons, the Service concurs implementation of the proposed action *may affect, is not likely to adversely affect* Cook's lomatium.

Concurrence

The Service concurs that the above proposed action, as detailed in the Assessment and in the Description of the Proposed Action and Effects section of this letter, *may affect, is not likely to adversely affect* the spotted owl, murrelet, Gentner's fritillary, McDonald's rockcress or Cook's lomatium This concurrence is based on the fact that all projects comply with the Forest's Land and Resource Management Plans (USDA FS 1989, USDA FS 1990), and will incorporate the mandatory PDC described in Appendix A.

Incidental take is not expected and is not authorized for this consultation. Consultation on this action should be reinitiated if 1) new information reveals effects of the action that may affect listed species or designated critical habitat in a manner or to an extent not considered in this consultation; 2) the action is subsequently modified in a manner that causes an effect to a listed species or designated critical habitat that was not considered in this consultation; 3) and/or a new species or critical habitat is designated that may be affected by this project.

Because the proposed action is not likely to adversely affect Gentner's fritillary, McDonald's rockcress, Cook's lomatium, spotted owls, murrelets; or their designated critical habitats within the action area, it is not necessary to consider whether the action will jeopardize the species or appreciably diminish the value of their designated critical habitats to the recovery of the species.

This response is prepared in accordance with section 7(a)(2) and 7(c) of the Act, and concludes informal consultation on the project pursuant to 50 CFR 402. If new information or project modification reveals that the proposed actions may affect listed species in a manner or to the extent not considered in your Assessment, or if a new species is listed or critical habitat is designated that may be affected by the actions, work should be halted and consultation reinitiated immediately.

If any questions arise concerning the contents of this concurrence letter, please contact Cynthia Donegan at 541-957-3469.

Sincerely,

Jim Thrailkill
Field Supervisor

cc: Office Files, FWS-OFWO, Portland, OR (e)
Dave Clayton, USFS, Medford, OR (e)
Brendan White, FWS-OFWO, Portland, OR (e)
Larry Salata, FWS-RO, Portland, OR (e)

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Appendix A: Project Design Criteria

Project design criteria (PDC) are measures applied to project activities designed to minimize potential detrimental effects to proposed or listed species. PDC usually include seasonal restrictions and may also include clumping of retention trees around nest trees, establishment of buffers, dropping the unit(s)/portions, of dropping the entire project. Use of project design criteria may result in a determination of no effect for a project which would have otherwise been not likely to adversely affect. In other cases, project design criteria have resulted in a determination of not likely to adversely affect for a project which might have otherwise been determined to be likely to adversely affect. The goal of project design criteria is to reduce adverse effects to listed or proposed threatened or endangered species.

Physical impacts to habitat and disturbances to individual species will be reduced or avoided with PDC. Listed below are species-specific project design criteria designed for the programmatic impacts discussed in the *Effects of the Action* section of this document. For each species, project design criteria have been separated into those that reduce or avoid habitat removal and those that reduce or avoid disturbance and/or disruption. Under the proposed action, the unit wildlife biologist may increase or decrease the disturbance distance-related project design criteria, based on site-specific conditions, subject to Level 1 concurrence.

The Forest retains discretion to halt and modify all projects, anywhere in the process, should new information regarding proposed and listed threatened or endangered species arise. Minimization of impacts would then, at the least, include an appropriate seasonal restriction; and could include clumping of retention trees around the nest trees, establishment of buffers, dropping the unit(s)/portions, or dropping the entire project.

The seasonal or daily restrictions listed below may be waived at the discretion of the decision maker if necessary to protect public safety (as in the case of emergency road repairs or hazard tree removal). Emergency consultation with the Service will then be initiated in such cases, where appropriate.

Should new information arise that significantly changes impacts to listed threatened or endangered species, the Forest retains discretion to halt and modify all projects, anywhere in the process. Modifications could include an appropriate seasonal restriction; clumping of retention trees around the nest trees, establishment of buffers, dropping the unit(s)/portions, or dropping the entire project.

PDC may be waived at the discretion of the decision-maker, if necessary to protect public safety (as in the case of emergency road repairs). The Service will be notified of all such occurrences to determine if emergency consultation is required and to adjust environmental baselines if necessary. The Forest will be prudent in evaluating public safety deviations. They will attempt to predict potential problems (such as road failures) such that remedies can occur during times and using methods that minimize impacts to the extent possible. In the event emergency consultation is initiated, the Forest will act prudently and efficiently to complete or close consultation in a timely manner, preferably within 6 months or less of the emergency action.

There are two types of PDCs:

Mandatory: must be incorporated in all projects to reduce adverse affects (LAA) to listed species – required unless a specific exemption is mentioned in a "recommended" PDC and

Mandatory PDC are incorporated in all appropriate planned actions. The effects determination reflects their implementation. Projects unable to incorporate mandatory PDC will be analyzed under separate consultation.

Recommended: discretionary; incorporated in projects where appropriate to further reduce adverse affects (LAA)

In some cases, application of PDC may reduce the impact of the projects to listed species and may change the effects determinations (from LAA to NLAA, or from LAA or NLAA to NE). In all cases, effects determinations for projects have been made using applicable PDCs. The goal is to reduce the detrimental effects of any projects which "may affect" any endangered or threatened species. Some PDC apply to multiple species although most PDC apply to specific species. PDC are described by project type. The Plant PDC apply to all listed plants unless specifically mentioned.

This consultation effort updates some PDC that were used on projects covered by previous consultation efforts. These updated PDC will be incorporated into actions covered under previous consultations that have not yet been implemented, unless incorporating new PDC is not practical. In those cases, PDC in place under the previous consultation will apply.

The PDC in this consultation will be incorporated into those projects that will be implemented, in FY 2009-2014

Fire firefighter safety must be taken into account at all times when using the PDC. If implementation of PDC might cause human safety risks, the Forest will respond to the human safety threat and will determine if that response is grounds for re-initiation of consultation.

Impacts	Species: **Northern Spotted Owl**
	Any of the following Mandatory PDCs may be waived in a particular year if nesting or reproductive success surveys conducted according to the Service-endorsed survey guidelines reveal that spotted owls are non-nesting or that no young are present that year. Waivers are valid only until March 1 of the following year. Previously known sites/activity centers are assumed occupied unless protocol surveys indicate otherwise.
Disturbance	1) **Work activities** (such as tree felling, yarding, road construction, hauling on roads not generally used by the public, prescribed fire, muffled blasting) that produce loud noises above ambient levels, or produce thick smoke that would enter the stand, **will not occur within specified distances (see table below) of any nest site or activity center of known pairs and resident singles between 1 March and 30 June (or until two weeks after the fledging period)** – unless protocol surveys have determined the activity center to be not occupied, non-nesting, or failed in their nesting attempt. **The restricted zone is 1.0 mile for any unmuffled blasting.** This distance may be shortened if significant topographical breaks or blast blankets (or other devices) muffle sound traveling between the blast and nest sites. March 1 – June 30 is considered the critical early nesting period; the action agency biologist has the option to extend the restricted season during the year of harvest, based on site-specific knowledge (such as a late or recycle nesting attempt). The boundary of the prescribed area may be modified by the action agency biologist using topographic features or other site-specific information.). The restricted area is calculated as a radius from the assumed nest site (point). See Fuels management PDCs for direction regarding site preparation and prescribed fire.
Disturbance	2) **If an active spotted owl nest or activity center is located within or *adjacent* to a project area, delay the project activity until September 30th** or until an action agency biologist determines that young are not present. For a given situation, the "adjacent" distance is determined by the action agency

	biologist – if needed, contact Level 1 team for guidance. If any project activity is so close to a known or suspected owl site that the disturbance would flush a nesting spotted owl, curtail the project activity until September 30. The field biologist has the discretion to conduct surveys and determine fledging activity.
Fuels	3) Broadcast burning (for site preparation) will not take place within 0.25 mile of known active northern spotted owl nests between 1 March and 30 June (or until two weeks after the fledging period) unless smoke will not drift into the nest stand.
Vegetation management	**Mandatory: Gopher Baiting** Strychnine baiting will not occur within 0.25 mile a of known spotted owl activity center. The following general criteria will be used with Gopher Baiting a. Experienced contractors will conduct field training of workers as needed in the identification and location of gopher burrows, application of bait, and safety procedures. b. The baiting projects will be supervised and administered by experienced personnel. c. All baiting will be underground. d. Any spilled bait will be completely removed from the ground surface and buried.
Restoration projects	Mandatory: To minimize the number of potential spotted owl or murrelet nest trees used for instream structures, only the following sources shall be used: (I) Trees already on the ground in areas where large woody material is adequate; (II) Trees lacking suitable nesting structure for spotted owls or murrelets or contributing to trees with suitable nesting structure, as determined by an action agency wildlife biologist.
Wildfire	**Mandatory:** Whenever possible, protect known nest sites of any listed species from high intensity fire. Update Resource Information Book annually; incorporate new nests or sites as soon as possible.
Wildfire	**Mandatory:** (I) From 1 March – 30 June noise disturbance should be minimized inside occupied stands and within 0.25 mile of the edge of these stands. In order to accomplish this objective, minimize repeated aircraft flights that are less than 1,500 feet Above Ground Level (AGL). Also, minimize the use of fire line explosives within 1 air mile of occupied stands during the protection period.
Wildfire	Light Hand Tactics or Minimize Impact Suppression Tactics (MIST) should receive consideration for use within the protection zones for northern spotted owls and murrelets.
Quarries	1) For active nest sites or unsurveyed suitable habitat within 0.25 mile of the quarry operation (1.0 mile for blasting), restrict operation of the quarry from March 1 through June 30 (unless protocol surveys demonstrate non-nesting). **Recommended:** 2) For active nest sites or unsurveyed suitable habitat within 0.25 mile of the quarry operation, restrict operation of the quarry from March 1 through September 30 (unless protocol surveys demonstrate non-nesting).

Type of Activity – Prescribed Distances for Spotted Owl	Zone of Restricted Operation
Blast of more than 2 pounds of explosive	1 mile
Blast of 2 pounds or less of explosive	120 yards
Impact pile driver, jackhammer, or rock drill	60 yards
Helicopter or single-engine airplane Type I or II Helicopters	120 yards for small helicopters; 0.25 miles for Type 1 or 2 helicopters
Chainsaws (hazard trees, tree harvest, etc.)	195 feet
Heavy equipment	105 feet

Marbled Murrelet

PDCs apply to two different inland "belts." PDCs deal with *removal/degradation* of habitat and *disturbance* of nesting murrelets.

Occasionally individual hazard trees are found which have not been surveyed for murrelet use and which have the potential to support a murrelet nest. If these trees are an immediate threat to human safety, they will be cut. Otherwise, these trees will be removed during the non-nesting season (16 September to March 31).

What is the minimum site (size/quality) where survey protocol will be applied? Guidance: Field assessments conducted to make the determination of habitat suitability are of vital importance to the conservation and protection of marbled murrelet breeding sites. Any stand with a residual tree component or small patches of suitable habitat should be considered potential nesting habitat, and surveyed to protocol. Any assessment of habitat must include a walk-through of every acre of the area that will be impacted by a project

Brief Description of the two Areas ("bands"): **Area A** = Area west of the line between the coastal Western Hemlock/Tanoak Zone and inland Mixed Conifer/Mixed Evergreen Zone; this area is the known range for marbled murrelet in southwest Oregon. **Area B** = Area 6.5 miles (10 km) east of Area A (although Area B is outside the known range for this species, potential nesting habitat will continue to be surveyed in this "buffer" area, where projects may affect this potential habitat). No surveys for marbled murrelets are required on land outside of (east of) Areas A and B.

	Species: **Marbled Murrelet**
Habitat	(I) For Survey Areas **A and B, if the project removes or degrades suitable habitat, the project must be surveyed to protocol** (current Pacific Seabird Group two year protocol – to document presence/absence of murrelet). If it is not feasible to complete the two-year protocol, the Service will be contacted on a case-by-case basis to discuss other means of insuring that potential nest trees are not impacted. The action agency has the option of not surveying suitable habitat and classifying these stands as "Occupied." A "new" LSR must be established for any timber stand in Areas A or B that is determined to be or assumed to be occupied by marbled murrelet.
Disturbance	(II) For **Survey Areas A and B work activities** (such as tree felling, yarding, road and other construction activities, hauling on roads not generally used by

	the public, muffled blasting) which produce noises above ambient levels **will not occur within specified distances (see table below) of any occupied stand or unsurveyed suitable habitat between April 1 – August 5. For the period between August 6 – September 15, work activities will be confined to between 2 hours after sunrise to 2 hours before sunset.** See Fuels management PDCs for direction regarding site preparation and prescribed fire.
Disturbance	(III) **Clean up trash and garbage daily** at all construction and logging sites. Keep food out of sight so as to not attract crows and ravens (predators on eggs or young murrelets).
Disturbance	(IV) **Blasting** (open air/unmuffled) – **No blasting/pile driving activities 1 April through 15 September within 1.0 mile of occupied stands or unsurveyed suitable habitat.** This distance may be shortened if significant topographical breaks or blast blankets (or other devices) muffle sound traveling between the blast and nest sites or less than 2 lbs of explosives are used If so, then use described distance.
Disturbance	**1) Recommended:** Delay project implementation until after September 15 where possible
Disturbance	**2) Recommended:** Between 1 April and 15 September, concentrate disturbance activities spatially and temporally as much as possible (e.g., get in and get out, in as small an area as possible; avoid spreading the impacts over time and space).
Restoration projects	**Mandatory:** To minimize the number of potential spotted owl or murrelet nest trees used for instream structures, only the following sources shall be used: (I) Trees already on the ground in areas where large woody material is adequate; (II) Trees lacking suitable nesting structure for spotted owls or murrelets or contributing to trees with suitable nesting structure, as determined by an action agency wildlife biologist.
Fuels	**Mandatory:** (I) Burning would not take place within 0.25 mile of known occupied marbled murrelet sites, or unsurveyed marbled murrelet habitat between April 1 and August 6 unless smoke will not drift into the occupied site. (II) All broadcast and under-burning operations (except for residual "smokes") will be completed in the period from two hours after sunrise to two hours before sunset. (IV) During helicopter operations, flights over suitable habitat will be restricted (helicopter should be a least 1,500 feet above ground level); if not possible, fly a minimum of 500 feet above suitable habitat (above canopy).
Wildfire	**Mandatory:** Whenever possible, protect known nest sites of any listed species from high intensity fire. Update Resource Information Book annually; incorporate new nests or sites as soon as possible.

Wildfire	**Mandatory:** (I) From 1 April - 5 August noise disturbance should be minimized inside occupied stands and within 0.25 mile of the edge of these stands. In order to accomplish this objective, minimize repeated aircraft flights that are less than 1,500 feet Above Ground Level (AGL). Also, minimize the use of fire line explosives within 1 air mile of occupied stands during the protection period.
	Recommended: Light Hand Tactics or Minimize Impact Suppression Tactics (MIST) should receive consideration for use within the protection zones for northern spotted owls and murrelets.
Quarries	**Mandatory:** 1) For any occupied stands or unsurveyed suitable habitat within 0.5 mile of the quarry operation, restrict operation of the quarry from April 1 to September 15. Agency biologists also have the discretion to modify the 0.5-mile zone depending on topography and the level of noise - what equipment will be present (crusher or dozer/ripper or only loading of existing stockpiled rock).
Quarries	1) For active nest sites or unsurveyed suitable habitat within 0.25 mile of the quarry operation (1.0 mile for blasting), restrict operation of the quarry from March 1 through June 30 (unless protocol surveys demonstrate non-nesting). **Recommended:** 2) For active nest sites or unsurveyed suitable habitat within 0.25 mile of the quarry operation, restrict operation of the quarry from March 1 through September 30 (unless protocol surveys demonstrate non-nesting).

Type of Activity – Prescribed Distances for Marbled Murrelet	Zone of Restricted Operation
Blast of more than 2 pounds of explosive	1 mile
Blast of 2 pounds or less of explosive	120 yards
Impact pile driver, jackhammer, or rock drill	120 yards
Type III-IVHelicopter or single-engine airplane Type I or II Helicopter	120 yards 0.25 miles
Chainsaws (hazard trees, tree harvest, etc.)	120 yards
Heavy equipment	120 yards

General and specific PDC's for listed plants

Unless otherwise noted below, for activities in suitable habitat, qualified botany personnel must survey for and document occurrences of any listed endangered plant species following the listed plant protocol. This must occur prior to signing a decision notice or memo for an action. Effects of the action will be documented in the NEPA document (CE, EA, or EIS). Once the decision is signed, the clearance surveys for that project and those acres are valid, even if implementation does not occur immediately. If new species are federally listed, and were previously surveyed for as Forest Service special status species, then the 10 year interval requirement as explained in the Listed Plant Survey Protocol will apply.

Suitable habitat and dormancy periods for the four species are defined in Section IV. Projects within these ranges, if they could affect any listed plant species, must be surveyed. Surveys do not need to occur outside the range of the species. Certain activities are allowed within occupied habitat during the dormancy period, if the resulting habitat is deemed neutral or beneficial to the species. If the project area does not contain suitable habitat (as determined by the project botanist) for any of the endangered plants, then surveys for the listed plants are not required.

Plant sites (occurrences) must be identified on the ground using standard location protocols utilized by the agencies (GPS coordinates, ribbon, paint, signs etc.). In project areas where actions are occurring, an occupied polygon (this may be a single plant in a 1 meter square) is usually buffered to reduce or negate effects from habitat and ground-disturbing activities. Other design features that reduce effects (seasonal restrictions, method of activity, etc.) are listed below.

Buffer sizes can vary by project type. Listed below are *minimum* distances used to protect the occupied site from various activities. For certain activities buffers can be larger, depending on site-specific recommendations made to the line officer from the project Botanist. Buffers are a set distance that extends from the perimeter or the hypothetical polygon boundary of a "population." For example, for a single plant, a buffer would extend a certain distance from that point. For a cluster of plants in a defined population, the buffer would extend from a polygon that delineates the colony. In cases where there is a string of colony's or patches, separated by less than a few hundred feet, in suitable habitat, this might all be delineated as a single population on the ground and buffered accordingly.

If indeterminate *Fritillaria* vegetative leaves are found after a protocol survey (1 or 2 year), while the area is deemed cleared, if the botanist determines that there is a high likelihood that the plants could be Gentner's fritillary based on the proximity of other populations and/or the suitability and condition of the habitat, then the following discretionary PDC's are recommended to be implemented:

- Buffering patches of vegetative plants or
- Changing the prescription or timing of the action to reduce any potential impact and/or
- Monitoring of the site during and after the action (identified in the NEPA document)

Annually, as new populations are documented, any occurrence and monitoring information will be reported to the FWS.

Tree Harvest - PDC's

- Two year surveys required for Gentner's fritillary following the protocol for Timber sales. Salvage sales and incidental tree harvest under permit only require a 1 year survey in suitable habitat.
- Buffer sizes: a minimum of 25 feet from the population boundary (a site, or the outer edge of a polygon encompassing the population). No harvest activity within the buffer.
- No heavy equipment, skidders, yarders, etc., within 75 feet of a buffer (100 feet from the occurrence).
- No tree falling into or yarding through buffered sites.
- No tree planting within 75 feet of the edge of the buffer (100 feet from occurrence), so as to maintain edge and more open habitat.
- Do not locate anchor trees within known sites. This includes anchor trees on Federal land requested by private landowners.
- Construction of new landings should be at least 300 feet from known sites. Use of a previously existing landing is allowed if the location of the plant(s) is more than 100 feet away (see fuels section). Logging use of existing landings within 100 feet of an occurrence is not allowed (*i.e.*,

landings sometimes grow through a sale, and are a source for new noxious weed populations, and burning of landing slash piles often kill surrounding vegetation).

- Proposed logging road locations, including temporary haul roads, must be surveyed and populations protected by a minimum 100-foot buffer. Use of existing roads within 100 feet of an occurrence is allowed (see road maintenance section).
- Hazard trees. No surveys are required for hazard trees that are documented as a safety hazard in campsites, trailheads, roadsides, property lines, power line corridors, etc. For known plant sites, when possible, coordinate with the local botanists to develop any site-specific measures to reduce effects (e.g. directional falling).
- Commercial thinning, oak woodland and riparian thinning, and wildlife habitat improvement projects; Buffer sizes for thinning: a minimum of 25 feet from the population boundary. For these actions, buffers can be treated manually during the dormancy period. Directional falling of trees out of the buffer will occur with minimum soil disturbance. No cable yarding or skidding through buffers. For *Fritillaria gentneri*, a minimum 40 percent canopy is retained from trees and shrubs (plant level canopy cover). If the existing canopy cover is below 40 percent, no treatment allowed in buffered occurrences. There is no canopy minimum for *Lomatium cookii*. No vehicles or heavy equipment in buffered occurrences.

Watershed Restoration Projects - PDC's

- One year surveys required for watershed restoration projects in suitable habitat
- Culverts: If within suitable habitat, and if intact, native habitat is disturbed, these areas must be surveyed, and populations protected by site-specific mitigation. If the footprint of disturbance for construction or replacement is not new, then no survey is required.
- Bridge construction (see Roads/Engineering section).
- Buffer sizes: a minimum of 25 feet from the population boundary (a site, or the outer edge of a polygon encompassing the population). No activity within the buffer.
- If equipment corridors for in stream work pass through suitable habitat, surveys and buffering of occurrences by 100 foot buffer required. No heavy equipment in known population buffers.
- No riparian or tree planting within 75 feet of the edge of the buffer (100 feet from occurrence), so as to maintain edge and more open habitat.
- No tree falling into or yarding through buffered sites

FS road maintenance, construction – PDC's

Maintenance

- Road maintenance of open existing roads: blading, rocking, ditching, mowing, culvert replacement, brushing etc. Protect known sites from maintenance activities that could affect populations, using site-specific mitigation such as no treatment zones. No surveys required.

Exceptions to PDC's

Exceptions to PDC's are occasionally necessary, usually for ecological emergency's or safety reasons. An example would be emergency vegetation treatments to control new pathogenic fungi like Sudden Oak Death, or eminent failure of a dam requiring immediate actions. Exceptions for other reasons may require reinitiation of consultation or amendments to the Assessment. Involvement by the level 1 team to determine if emergency consultation or reinitiation is necessary is required.

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Appendix D

Watershed and Soil Characteristics

Hydrology

The effect of roads and trails on hydrologic systems is usually analyzed at the site-scale and at the watershed scale in order to evaluate direct impacts of the road alignment (site-scale) and the indirect and cumulative watershed effects. Alternatives for motorized use designation have been analyzed at the site scale and the 6th field or "subwatershed" scale.

Appendix D presents the 5th and 6th field watersheds that have been analyzed. These subwatersheds are analyzed because they represent those watersheds where actions are being proposed to occur that would potentially affect (either adversely or beneficially) current conditions. Included are watershed characteristics, risks for adverse effects, key watershed and water quality listing status and Riparian Reserve status.

Watershed Analyses

The following Watershed Analyses were examined for current conditions information and used in effects analysis:

- **1995 North Fork of the Smith River, Chetco RD**
- **1995, Upper Rogue River Watershed, Prospect RD**
- **1995, Squaw/Elliot/Lake Watershed Analysis, Applegate RD**
- **1995, Silver Creek National Watershed #9, Galice RD**
- **1996, Chetco River Watershed Analysis, Chetco RD**
- **1996, Quosatana Creek Watershed Analysis, Gold Beach RD**
- **1997, Draft Grayback/Sucker Pilot Watershed Analysis Results, Illinois Valley RD**
- **1997, Lawson Creek Watershed Analysis, Gold Beach RD**
- **1998, Elk River Watershed Analysis, Gold Beach RD**
- **1998, Hunter Creek Watershed Analysis, Gold Beach RD**
- **1998, Middle Fork Applegate River Watershed Analysis, Applegate RD**
- **1999, Middle Illinois River Watershed Analysis, Illinois Valley RD**
- **2000, East Fork Illinois River Watershed Analysis, Illinois Valley RD**
- **2000, Rogue River below Agness Watershed Analysis, Gold Beach RD**

The following 5th and 6th field watershed were considered based on the Proposed Action (Alternative 3) and are the basis of effects discussion in the FSEIS.

Table D-1. TMP Proposed Action Watersheds

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Powers District									
Big Tree Trail #1150	4 & 5	Trail-prohibit motorized use	S.F. Coquille/Elk Creek	Yes	S.F. Coquille	Low	0.1	None	None
Gold Beach District									
Game Lake Trail #1169	3, 4, & 5	Trail-prohibit motorized use	Lawson-Illinois River; Lower Illinois River	Yes	Yes	Low	0.87	7	1
Lawson Creek Trail # 1173	3 & 4	Trail-prohibit motorized use	Lawson-Illinois River; Lower Illinois River	Yes	Yes	Low	0.6	None	1

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Lawson Creek Trail # 1173	4	Trail-prohibit motorized use	Lawson-Illinois River; Lower Illinois River	Yes	Yes	Low	0.38	2	None
Lawson Connector Trail	4	Trail-prohibit motorized use	Lawson-Illinois River; Lower Illinois River	Yes	Yes	Low	0.31	4	None
Shasta Costa Creek Trail	4	Trail-prohibit motorized use	Rogue River, Illahe & Shasta Costa	Shasta Costa	Shasta Costa	Low	0.05	None	None
Nancy Creek[5] & Shasta Costa Creek Trails	4	Trail-prohibit motorized use	Illinois River, Indigo & N.F. Indigo	Yes	Illinois River	Low	2.28	14	5

[5] The Nancy Creek and Shasta Costa routes were removed from the baseline inventory in the FSEIS; see section D, 3, Chapter II and FSEIS Appendix I for more detail.

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Road 3680409 (Game Lake)	3	Conversion to Trail	Lawson-Illinois River; Lawson Creek	Yes	Yes	Low	None	None	None
Roads 3680351, 353 (Lawson/Fairview)	3	Conversion to Trail	Lawson-Illinois River; Lawson Creek	Yes	Yes	Low	None	None	None
Roads 3313103,3680 190,195,220 (Signal Buttes)	3 & 5	Conversion to Trail	Hunter Creek, Lower Rogue, Quosatana	Portions of Quosatana	Hunter and Lower Rogue	Low	0.53	5	None
Roads 3313110, 117 (Kimball Hill)	3 & 5	Conversion to Trail	Quosatana	Yes	Rogue River	Low	0.6 for Alt 3 & 0.08 for Alt 5	6 for Alt 3 & None for Alt 5	None
Red Flat Trail	4	Prohibit Motorized Use	Hunter Creek/Upper Hunter	No	Hunter Creek		None	None	None
Trail # 1103	4	Prohibit Motorized Use	Chetco River/Eagle Creek	No	Chetco		None	None	None

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Silver Lake Trail #1184	3, 4, & 5	Prohibit Motorized Use	Silver Creek, Upper Silver Creek	Yes	U. Silver Creek	Low	0.68	3	None
Hobson Horn Trail #1166	4	Prohibit Motorized Use	Illinois River, Lawson, Indigo, N.F. Indigo, Silver, N.F. Silver	Yes	Illinois River, N.F. Silver	Low	0.76	8	None
Fish Hook Peak Trail # 1180	4	Prohibit Motorized Use	Indigo, West Fork Indigo Creek.	Yes	Illinois River	Low	None	None	None
Taylor Creek Trail #1142, Big Pine Spur Trail #1142A, Trail #1157, Onion Way Trail #1281, Secret Way #1282A	3, 4, & 5	Prohibit Motorized Use	Briggs Creek, Upper Briggs Creek	No	Briggs	Moderate	2.35	6	None
Swede Creek Trail	3, 4, & 5	Prohibit Motorized Use	Briggs Creek, Lower Briggs	No	Briggs	Moderate	0.5	3	1

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Road 2600050	4	Prohibit Motorized Use	Silver Creek, Upper Silver Creek	Yes	Silver Creek	Low	0.22	3	None
Trail #1146,1132, Dutchy/Chance Creek	4	Prohibit Motorized Use	Silver Creek, Upper Silver Creek, Briggs Creek, Upper Briggs Creek	Silver Creek	Silver Creek, Briggs Creek	Moderate	0.89	2	2
Trail 132, 1135, 1143, Red Dog, Orion	4	Prohibit Motorized Use	Briggs Creek, Lower Briggs and Upper Briggs	No	Briggs Creek	Moderate	10	20	10
Wild Rivers District									
Road 4201016 (Eight Dollar Mtn.	3, 4,& 5	Prohibit Motorized Use	Deer Creek, Lower Deer Creek, Josephine, & Sixmile	No	Deer Creek, Illinois River	Moderate/Low	2	6	1

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Roads 4300910,920,925,4300011	3, 4, & 5	Prohibit Motorized Use	Josephine Creek	No	Fiddler, Canyon, & Illinois River	Low	0.98	3	1
Roads 4300920, 011 (Botanical Area Roads)	4	Prohibit Motorized Use	Josephine Creek	No	Fiddler, Canyon, & Illinois River	Low	0.83	1	
Roads 421029 (Botanical Area Roads)	4	Prohibit Motorized Use	Josephine Creek	No	Fiddler, Canyon, & Illinois River	Low	1	3	None
Road 4300910 (Wetlands)	3, 4, & 5	Prohibit Motorized Use	Josephine Creek	No	Fiddler, Canyon, & Illinois River	Low	1.56	4	2
Roads 4300920,011 (Wetlands)	3, 4, & 5	Prohibit Mixed Use	Josephine Creek	No	Fiddler, Canyon, & Illinois River	Low	0.83	1	None
Roads 4201029 (Botanical Area)	3, 4, & 5	Prohibit Mixed Use	Josephine Creek	No	Fiddler, Canyon, & Illinois River	Low	1	8	1

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Roads 4201844,846,847,4103087,2524048,2524015	4	Prohibit Motorized Use	Illinois, Josephine, Sixmile, Baker, Briggs, Lower Briggs, Deer, Lower Deer	No	Illinois	Low	0.05	1	None
Road 4402494 (Biscuit Hill Trail)	3	Conversion to Trail	N.F. Smith River, Baldface Creek	No	Rough & Ready Creek	Low	None	None	None
Roads 4400445, 460, 480, 485 (Botanical Areas)	3, 4, & 5	Prohibit Motorized Use	Illinois, Rough and Ready Creek	No	Rough & Ready Creek	Low/Moderate	0.3	2	None
Roads 4402019, 112,450,172,206,259A,550	4	Prohibit Motorized Use	N.F. Smith River, Baldface Creek, Diamond, W.F. Illinois, Rough & Ready	Baldface Creek	W.F. Illinois River	Low	0.08	None	1

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Bolan Lake Trail #1245	3, 4, & 5	Prohibit Motorized Use	Sucker Creek	No	Sucker Creek	Moderate	None	None	None
Mt. Elijah Trail # 1206	3, 4, & 5	Prohibit Motorized Use	Sucker Creek	Upper Sucker Creek	Sucker Creek	Low/Moderate	0.3	2	None
Elk Creek Trail #1230	4	Prohibit Motorized Use	Sucker Creek, Grayback Creek	Grayback Creek	Grayback Creek	Low	0.8	4	None
Boundary Trail #1207, 903, 907	4	Prohibit Motorized Use	Applegate, Steve & Sturgis, Carberry Creek	Sucker Creek	None	Low	1.59	8	None
Siskiyou Mountains District									
Horse Camp Trail #958	3, 4, & 5	Prohibit Motorized Use	Applegate, Butte and Middle Fork	No	None	Low	1.1	4	0
Cook and Green Trail #959	4	Prohibit Motorized Use	Applegate River	No	None	Low	None	20	3

Road or Trail	Alt(s)	Proposed Activity	Watershed (5th and 6th fields)	Key Water-shed	Listed Streams	CWE risk rating	Miles in Riparian Reserve	Ephemeral Stream Crossings	Perennial Stream Crossings
Penn Sled Trail	3 & 5	Authorize Motorized Use	Applegate, Squaw Creek	No	None	Moderate	None	None	None
Little Grayback Trail #921	4	Prohibit Motorized Use	Applegate, Squaw Creek	No	None	Moderate	0.72	8	None
Mule Mountain Trails #918, 919, 920	4	Prohibit Motorized Use	Applegate, Palmer Creek	Yes	Applegate	Low	4.86	19	2
High Cascades District									
High Cascades Play Area	3	Allow Off-Rd Motorized Use	Big Butte, Clarks Fork-Fourbit Creek	No	None	Moderate	None	None	None

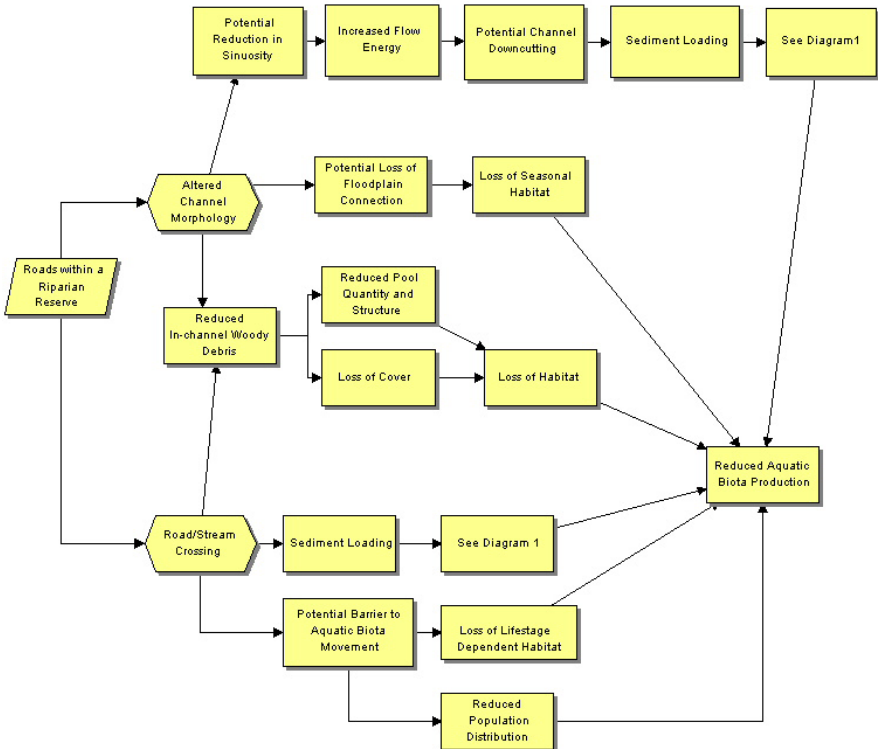
Effects Mechanisms for Fisheries and Aquatic Species

General effects related to roads and motorized trails located within Riparian Reserves are detailed below in Figures D-1, D-2, and D-3. Information displayed in these diagrams is supported by Gucinski et al. 2001, Waters 1995, Furniss et al. 1991, Hausle and Coble 1976, and Cordone and Kelley 1961. It should be noted that none of the alternatives would result in measurable increases from road and motorized trail related impacts to aquatic habitat beyond what is currently occurring.

Figure D-1. Road and Motorized Trail Related Sediment Deposition Effects

Figure D-2. Road and Motorized Trail Related Suspended Sediment Effects

Figure D-3. Potential Effects from Roads and Motorized Trails Located Within a Riparian Reserve



ROAD SYSTEM BMPS

R-1. Title: General Guidelines for the Location and Design of Roads

Objective: To locate and design roads with minimal resource damage.

Explanation: There are several general considerations which must be incorporated into the planning of road locations and designs. These measures are preventive and indirectly protect water quality and associated aquatic resources. The following apply to all transportation activities:

a. A basic requirement for transportation facility development and operation is the formulation and evaluation of alternatives, and the selection of an alternative that best meets resource management objectives with the least adverse effect on environmental values.

b. In the location, design, and construction of roads, an interdisciplinary team is used to evaluate the effects of transportation development and operations and minimize adverse economic, environmental, and social impacts.

c. All resource-coordinating instructions for the protection and prevention of damage to National Forest resources shall apply to the planning, development, and operation of transportation facilities. The following instructions apply to system roads:

(1) Roads should be located to facilitate completion of the area transportation system, fit the terrain, and minimize damage to improvements and resources. Fragile and special areas that cannot be mitigated to an acceptable level of resource damage should be avoided.

When possible, roads use non-geometric horizontal and vertical alignment conforming as much as possible to natural ground contours. This allows a survey to be taken on or near the actual location of the road to be constructed, instead of on a preliminary line from which the final location would be offset. This type of location and survey, and the following design and construction, results in smaller cuts and fills with less total material moved and narrower clearing widths. The final road has a much lower impact than one located, surveyed and designed by more conventional methods.

(2) Road design standards and design criteria are based on a transportation plan for the area, an economic analysis, road management objectives which identify traffic requirements during and following the sale, safety requirements, resource objectives to be met or mitigated, and specific resource concerns.

(3) Stream crossing structures shall be designed to provide the most efficient drainage facility consistent with resource protection and costs. The design may involve a hydrologic analysis to determine runoff volumes, flood conditions, velocities, scour, and open channel shapes.

Implementation and Responsibility: An interdisciplinary team aids the responsible official in defining resource objectives which are used to locate the road and in developing mitigative measures.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project plan requirements and the operating plan determined with tests, measurements, and observations by the Forest Service Contracting Officers Representative (COR) or Engineering Representative (ER).

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[6] Reference is now made to new National Best Management Practices (BMPs) for Water Quality Management (April 2012). The purpose of the National BMP Program is to provide a standard set of core BMPs and a consistent means to track and document the use and effectiveness for BMPs on NFS lands. These are now used in concert with the General Water Quality Best Management Practices, Pacific Northwest Region, November 1988.

Monitoring: EA review process, tagline reviews, plan-in-hand reviews, progress reviews during construction, and final inspection. Also see monitoring for other Road System BMPs and the Forest Plan monitoring plan.

R-2. Title: Erosion Control Plan

Objective: To limit and mitigate erosion and sedimentation through effective planning prior to initiation of road construction activities and through effective contract administration during construction.

Explanation: Land disturbing activities, such as road construction, usually result in short term erosion. By effectively planning for erosion control, sedimentation can be minimized. Prior to starting work, the Contractor submits a general plan which sets forth erosion control measures to be used. Operations cannot begin until the Forest Service has given written approval of the plan. The plan recognizes the mitigation measures required in the contract. All contracts specify that operations be scheduled and conducted to minimize erosion.

Implementation and Responsibility: Mitigative measures are developed by design engineers, using an interdisciplinary approach; the measures are reflected in the contract's specifications and provisions.

Erosion control is required by contract provisions common to road construction. The Erosion Control Plan is implemented by the Purchaser on timber sale contracts or Contractor on Public Works Projects.

This practice is commonly applied to road construction or timber sales, but should be extended to apply to road construction for mining, recreation, special uses, and other roadwork on the Forest.

Monitoring: Contract packet review, prework meetings, and operating plans along with tests, measurements, and observations by the COR or ER and watershed specialists. Also see Forest Plan monitoring plan.

R-4. Title: Road Slope Stabilization (Planning)

Objective: To reduce sedimentation by minimizing erosion from road slopes and minimizing the chances for slope failures along roads.

Explanation: Road stabilization considerations begin in the reconnaissance and location of the road. The first planning requirement is for an adequate engineering, hydrology, soils, and geology investigation to provide data for:

a. Cut and fill slope design.

b. Controlling surface and subsurface drainage.

c. Determining compaction standards and surfacing needs.

A prerequisite of stabilization is to provide basic mechanical stability of the soil, using data from the site investigations to develop requirements for proper slope angles, compaction, and adequate drainage.

Implementation and Responsibility: Erosion prevention must be included in planning for all road construction contracts.

Most, if not all, of the stabilization measures should be planned for completion on all disturbed ground prior to the winter season, when erosion is most severe.

At especially critical locations, with a high erosion or sedimentation potential, expensive remedies may be necessary.

Project location and mitigative measures are determined during the environmental analysis and road design process, and included in the project plan using an interdisciplinary approach.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project plan requirements and the operating plan is determined with tests, measurements, and observations by the COR or ER through inspection.

Monitoring: NEPA field review process, tagline review, plan-in-hand review, design review, road construction review process, and final inspection. Also see Forest Plan monitoring plan.

R-5. Title: Road Slope and Waste Area Stabilization (Preventive)

Objective: To minimize soil erosion from cut slopes, fill slopes, and waste areas.

Explanation: Depending on various factors such as slope angle, soil type, climate, and proximity to waterways, many fill slopes, some cut slopes, and waste areas will require vegetative and/or physical restraint measures to provide for adequate surface soil stability. The level of stabilization effort needed must be determined on a case-by-case basis by appropriate personnel.

Vegetation measures include the seeding of herbaceous species (grass, legumes, or browse species), or the planting of brush and trees. Vegetative measures may include fertilization and mulching to ensure success.

Physical restraint measures may include, but are not limited to grading, ditches, scattering vegetative debris, erosion nets, terraces, side drains, blankets, mats, riprapping, mulch, tackifiers, pavement, and soil seals.

Implementation and Responsibility: Vegetative measures can improve the effectiveness of physical restraint measures, but may not be effective and complete by themselves for the first several seasons.

Physical restraint and vegetative surface stabilization measures will be periodically inspected, as necessary, to determine effectiveness. In some cases, additional work may be needed to ensure that the vegetative or mechanical surface stabilization measures continue to function as intended.

Initial project location, mitigative measures, and management requirements and needs are normally developed during the environmental analysis process, using an interdisciplinary approach. These requirements and needs are translated into contract provisions and specifications.

Monitoring: Forest Service work leaders, road inspectors, and their supervisors monitor work accomplishment and effectiveness, to help ensure that design standards, project plan constraints, and mitigative measures are met. Watershed specialists assist in implementation and effectiveness evaluations. Also see Forest Plan monitoring plan.

R-6. Title: Dispersion of Subsurface Drainage Associated with Roads

Objective: To minimize the possibilities of roadbed and cut or fill slope failure and the subsequent production of sediment.

Explanation: Roadways may change the subsurface drainage characteristics of a hillside. Since changes to normal areas and interruption of subsurface flows increase the risk of instability, it is sometimes necessary to provide special drainage (subsurface) to avoid saturation of the subgrade and slopes to reduce subsequent slope failure. The following are some dispersion methods which can be used:

a. pipe underdrains
b. horizontal drains
c. stabilization trenches
d. drainage blankets or rock drains
e. ditches

Dispersal of collected water should be accomplished in an area capable of withstanding increased flows. On most soils, energy dissipators need to be placed at pipe outlets. This is a preventive practice.

Implementation and Responsibility: Locatable wet areas and areas with underground flows are designed with appropriate mitigative measures to provide subsurface drainage. Locating such areas may involve geologists, engineers, soil scientists, and hydrologists.

Contracted projects are implemented by the Contractor or timber sale Purchaser. Compliance with project plan and specifications requirements, and operating plans is determined with tests, measurements, and observations by the COR or ER. Additional sites found during construction, or necessary changes to known sites, are designed in the same manner as the original sites.

Monitoring: Plan-in-hand review, design review, and road construction review process. Also see Forest Plan monitoring plan.

R-7. Title: Control of Surface Road Drainage Associated with Roads

Objective: (1) To minimize the erosive effects of water concentrated by road drainage features, (2) to disperse runoff from or through the road, and (3) to minimize the sediment generated from the road.

Explanation: A number of measures can be used, alone or in combination, to minimize possible detrimental effects of surface drainage. Culverts or bridges are normally placed at all natural drainages crossed by roads. Ditches, cross drains, water bars, dips, and grade sags are used to take water off the roadbed surface.

Methods used to reduce erosion may include such things as energy dissipators, aprons, downspouts, gabions, debris racks, and armoring ditches and drain inlets and outlets. Soil stabilization can help reduce sedimentation by reducing the effects of erosion on borrow and waste areas, on fill slopes, and on roadbeds.

Dispersal of runoff from roads can be accomplished by rolling the grade, insloping with cross drains, outsloping, crowning, installation of water spreading ditches, contour trenching, etc. Dispersal of runoff can reduce peak downstream flows and keep water in its natural drainage area.

Sediment travel can be reduced by installing measures such as sediment filters, settling ponds, and contour trenches.

Implementation and Responsibility: Soil erosion classification, parent rock, steepness of side slopes, soil type, and road grades are used to assist in project location, design criteria, and mitigative measures used by designers for surface drainage. The data is determined using an interdisciplinary approach during the environmental analysis and road design process, and then placed in contracts.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with plans, specifications, and operating plans is determined with tests, measurements, and observations by the Forest Service COR or ER.

Monitoring: Tag-line review, design review, and road construction review process. Watershed specialists assist with implementation and effectiveness evaluations. Also see Forest Plan monitoring plan.

R-9. Title: Timely Erosion Control Measures on Incomplete Roads and Stream Crossing Projects

Objective: To minimize erosion of and sedimentation from disturbed ground on incomplete projects.

Explanation: The best drainage design can be ineffective if projects are incomplete at the end of the dry season. Affected areas can include roads, waste areas, tractor trails, skid trails, landings, fills, streamcrossings, and bridge excavations. Preventive measures include:

a. Removal of temporary culverts, culvert plugs, diversion dams or elevated streamcrossing causeways;

b. Installation of temporary culverts, side drains, flumes, cross drains, diversion ditches, energy dissipators, dips, sediment basins, berms, debris racks or other facilities needed to control erosion;

c. Removal of debris, obstructions, and spoil material from channels and floodplains;

d. Grass seeding, placement of hay bales, and mulching.

Implementation and Responsibility: Protective measures must be applied to all areas of disturbed, erosion-prone, unprotected ground. When conditions permit operations outside of the dry season, erosion control measures must be kept current with ground disturbance, to the extent that the affected area can be rapidly "closed," if weather conditions deteriorate. Areas should not be abandoned for the winter with remedial measures incomplete.

Project mitigative measures and location are developed and documented during the environmental analysis process using an interdisciplinary approach.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project plan criteria, contract specifications, and operating plans is determined with tests, measurements, and observations by the COR or ER.

Monitoring: Road construction review process and observation during and after project completion. Also see Forest Plan monitoring plan.

R-10. Title: Construction of Stable Embankments (Fills)

Objective: To construct embankments with materials and methods which minimize the possibility of failure and subsequent water quality degradation.

Explanation: The failure of road embankments and the subsequent deposition of material into waterways may result from the incorporation of slash or other organic matter into fills, from a lack of necessary compaction during the construction of the embankment, from unsuitable soils, and from the use of inappropriate placement methods.

To minimize this occurrence, the roadway should be designed and constructed as a stable and durable earthwork structure with adequate strength to support the pavement structure, shoulders, and traffic. Proper slope ratio design, moisture content of soils, and compaction will normally promote stable embankments, as long as the soil is suitable. Embankments will be constructed of appropriate material and may be placed by one or more of the following methods:

a. Controlled compaction using density controlled strips
b. Controlled compaction (with normal testing procedures)
c. Special project controlled compaction
d. Layer placement (roller compaction)
e. Layer placement (hauling and spreading equipment operated uniformally over the entire width)
f. Sidecasting and end dumping

Method "f" is rarely specified for road construction, except on the lowest construction tolerance and to obtain adequate width for equipment to operate, and only in conformance with BMP R-11.

Implementation and Responsibility: Project constraints and mitigative measures are developed through the environmental analysis and road design process, using an interdisciplinary approach. The appropriate method of embankment placement is chosen during the design process.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project plan specifications and the operating plan is determined with tests, measurements, and observations by the COR or ER through inspection.

Monitoring: Design review, progress reviews during construction, and road construction review process. Also see Forest Plan monitoring plan.

R-11. Title: Control of Sidecast Material

Objective: To minimize sediment production originating from sidecast material during road construction or maintenance.

Explanation: Unconsolidated sidecast material can be difficult to stabilize and is susceptible to erosion, settling, and mass instability. Site-specific limits or controls for sidecasting uncompacted material should be developed through interdisciplinary input. Sidecasting is not an acceptable embankment placement alternative in areas where it will adversely affect water quality. Road widths on full bench ground should not include any width on side cast material without prior approval of the COR or ER.

Waste areas should be located where excess material can be deposited and stabilized. The location and provisions for disposal of waste materials are included in construction contracts. During road maintenance operations, the deposition of sidecast material shall be done where it will not weaken stabilized slopes. Disposal of slide debris shall be done only at designated waste areas where deposited material can be stabilized or approved for sidecast placement, which may include the road surface and fill slopes.

Implementation and Responsibility: Mitigative measures are developed through the environmental analysis and road design process, using an interdisciplinary approach, and are included in the project specifications, drawings, or guidelines.

Contracted projects are implemented by the Contractor or timber sale operator. Compliance with project criteria, contract specifications, and operating plans is determined with tests, measurements, and observations by the COR, ER, or maintenance engineer.

Contracts and guidelines address slide and slump repair, surface blading, and the placement of waste road material to reduce sidecasting.

Monitoring: Road design review, progress review during construction, and maintenance activity reviews. Also see Forest Plan monitoring plan.

R-12. Title: Control of Construction in Streamside Management Units

Objective: To reduce the adverse effects of sediment from nearby roads on slope stability, vegetation, and aquatic resources along a designated stream zone by:

a. Acting as an effective filter for sediment generated by erosion from road fills, dust drift, and oil traces;

b. Maintaining shade, riparian habitat (aquatic and terrestrial), and channel stabilizing effects;

c. Maintaining the floodplain in an undisturbed condition.

Explanation: Except at designated stream crossings, road fills, waste areas and other embankments must be kept at a distance from nearby streams. Factors such as stream class, channel stability, sideslope, ground cover, and soil stability are taken into account in developing riparian and streamside management unit widths. It is vital to stabilize fill slopes and control water runoff to minimize the movement of sediment into streamside management units.

Stream classes and streamside management unit widths are determined by an interdisciplinary process involving hydrologists, fisheries biologists, and other specialists as required.

Implementation and Responsibility: Project location and mitigative measures are developed by the interdisciplinary team. Specifications are inserted into the contract by design engineers.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with environmental criteria, contract specifications, and operating plans is determined with tests, measurements, and observations by the COR or ER.

Monitoring: NEPA field review process, tag line review, design review, and progress review during construction. Also see Forest Plan monitoring plan.

R-13. Title: Diversion of Flows Around Construction Sites

Objective: (1) To ensure that all stream diversions are carefully planned, (2) to minimize downstream sedimentation, and (3) to restore stream channels to their natural grade, condition and alignment as soon as possible.

Explanation: Flow must sometimes be guided or piped around streamside project sites. Typical examples are bridge and dam construction, or large culvert installation. Flow in stream courses will be diverted if the Forest Service deems it necessary due to expected sediment production during construction. Such a diverted flow shall be restored to the natural streamcourse as soon as practicable and, in any event, prior to normal periods of precipitation runoff.

Implementation and Responsibility: This practice is required by contract provisions. The planning and design process will identify where diversions are required, and the design will include mitigative measures to protect fishery values and other downstream uses. The planning process may include consultation with other Federal, State, or local agencies and private parties to ensure that all factors are considered.

Project location, bypass design, and mitigative measures are identified in the design and planning process to meet project criteria.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project criteria, contract specifications and operating plans is determined with tests, measurements, and observations by the COR or ER.

Monitoring: Progress review during construction and road construction review process. Also see Forest Plan monitoring plan.

R-14. Title: Bridge and Culvert Installation and Protection of Fisheries

Objective: To minimize sedimentation and turbidity resulting from excavation for in-channel structures.

Explanation: Excavation is a common requirement for the installation of bridges, culverts and minor streamside structures such as weirs, check dams, or riprapping. Waste material developed in such operations should neither obstruct the streamcourse (including natural floodplains) nor the efficiency of the associated structures. Some preventive and corrective measures are:

a. Excavated materials shall be kept out of live streams unless they are designed to be placed there. (i.e. riprap, etc.)

b. Sediment producing materials will not be left within reach of anticipated flood flows.

c. It is sometimes necessary to divert flowing water around work sites to minimize erosion and downstream sedimentation.

d. When needed, bypass and access roads shall be suitably located with plans made for their subsequent obliteration and stabilization.

For streams designated as important fisheries by Forest Service fisheries biologists, culverts will be installed only during flow periods specified in the project plan. Normally, this work would occur during minimum flow periods when water could be more easily diverted; work would not be allowed during salmonid fish spawning periods or before eggs have hatched and fingerlings have emerged from the gravel. Downstream sediment basins may be necessary to mitigate impacts on low flows.

Implementation and Responsibility: Project location and mitigative measures are developed during the road design process to meet the project criteria, using an interdisciplinary approach when deamed necessary.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project criteria and the operating plan is determined with tests, measurements, and observations by the Forest Service COR or ER through inspection.

Monitoring: NEPA field review process, plan in hand review, design review, progress review during construction and road construction review process. Also see Forest Plan monitoring plan.

R-18. Title: Maintenance of Roads

Objective: To maintain roads in a manner which provides for water quality protection by controlling the placement of waste material, keeping drainage facilities open, and by repairing ruts and failures to reduce sedimentation and erosion.

Explanation: Roads normally deteriorate because of use and weather impacts. This deterioration can be reduced through adequate maintenance or restriction of use. All system roads will be maintained to at least the basic custodial care required to maintain drainage, protect the road investment, and minimize damage to adjacent land and resources. This level is the normal prescription for roads that are closed to traffic. Higher levels of maintenance may be chosen to reflect greater use or resource protection. Additional maintenance measures could include resurfacing, outsloping, clearing debris from ditches and cross drains, restoration of ditches, and spot rocking.

Annually, the Forest Service determines the maintenance needs of each road. Roads to be maintained by commercial users are considered. The process to accomplish maintenance activities are budgeted and contracted or scheduled for force account work. The Forest Service may collect deposits for commercial use to facilitate road maintenance and to equitably assess maintenance cost of each user.

Implementation and Responsibility: The work is controlled by maintenance engineers who prioritize work to fit the budget and develop a road maintenance plan. Maintenance levels for each road are documented in road management objectives. Maintenance on timber sale roads is a Contractor responsibility commensurate with their use. On roads not maintained by active timber sales, the work is accomplished with Forest Service crews or by contract. Compliance with the contract provisions is determined with tests, measurements, and observations by the COR or ER.

Monitoring: Timber Sale road package or Public Works Contract review and on the ground review of road maintenance practices on the Forest. Also see Forest Plan monitoring plan.

R-19. Title: Road Surface Treatment to Prevent Loss of Materials

Objective: To minimize the erosion of road surface materials and consequently reduce the likelihood of sediment production from those areas.

Explanation: Unconsolidated road surface material is susceptible to erosion during periods of precipitation. Likewise, dust derived from road use may settle onto adjacent water bodies.

Road surface treatments include grading, watering, dust oiling, penetration oiling, sealing, aggregate surfacing, chip-sealing, or paving, depending on traffic, soils, geology, road design standards, the road objectives,and available funding.

Implementation and Responsibility: Project location and mitigative measures are developed by the design or maintenance engineer to meet project criteria.

Contracted projects are implemented by the Contractor or Purchaser. Compliance with project criteria, contract specifications, and operating plans is determined with tests, measurements, and observations by the COR or ER.

Monitoring: Road construction review process. Also see Forest Plan monitoring plan.

R-20. Title: Traffic Control During Wet Periods

Objective: (1) To reduce road surface damage and rutting of roads, and (2) to lessen sediment washing from damaged road surfaces.

Explanation: The unrestricted use of roads during wet weather can result in rutting and churning of the road surfaces. Runoff from such damaged road surfaces carries a high sediment load. The damage and maintenance cycle for roads that are frequently used in winter can create a disturbed road surface that is a continuing sediment source.

Roads involving more than casual use during wet periods shall have a stable surface and sufficient drainage to allow such use with a minimum of resource impact. Rocking, oiling, paving, and armoring are measures that may be necessary to protect the road surface and reduce material degradation. In many cases, use can be discouraged, but not eliminated. Where winter field operations are planned, roads may need to be upgraded, use restricted to low ground pressure vehicles, or maintenance intensified to handle the traffic without creating excessive erosion and damage to the road surfaces.

Implementation and Responsibility: Project-associated implementation procedures can be enforced by Forest Service personnel. Hauling activity can be controlled by the Sale Administrator or maintenance ER within active timber sales. The decision for restricted use is based on local weather, soil moisture conditions, and road damage criteria.

Mitigative measures are developed by engineers using an interdisciplinary approach as necessary. Contracted projects are implemented by the Contractor or Purchaser. Compliance with plans, specifications, and operating plans is determined with tests, measurements, and observations by the Forest Service COR or ER.

Monitoring: Timber Sale road package or Public Works Contract review, and forest road management inspection trips. Also see Forest Plan monitoring plan.

REC-6. Title: Management of Off-Road Vehicle (ORV) Use

Objective: To provide a systematic process to aid in determining when and to what extent ORV use will cause, or is causing adverse effects on water quality.

Explanation: The Forest ORV plan should:

a. Identify areas or trails where ORV use could cause degradation of water quality.

b. Establish baseline water quality data for normal conditions as a basis from which to measure change.

c. Identify water quality standards and the amount of change acceptable.

d. Establish monitoring methods and frequency.

e. Identify Best Management Practices appropriate in management of ORV's.

Implementation and responsibility: Monitoring results will be evaluated against the ORV plan objectives for water quality and the land management plan objectives for the area. These results will be documented along with the actions necessary to correct any problems.

If considerable adverse effects are occurring or are likely to occur, immediate corrective action will be taken. Corrective actions may include, but are not limited to, reduction in the amount of ORV use, signing or barriers to redistribute use, partial closing of areas, rotation of use on areas, closure to causative vehicle type(s) or total closure, and structural solutions, such as culverts and bridges.

Closure is done by authority of the Forest Supervisor (See BMP W-8).

Monitoring: Watershed and Recreation specialists will evaluate selected ORV use areas to measure the effectiveness of site-specific BMPs for ORV use. Also see Forest Plan monitoring plan.

REC-8. Title: Protection of Water Quality Within Developed and Dispersed Recreation Areas

Objective: To protect water quality by regulating the discharge and disposal of potential pollutants.

Explanation: This practice prohibits placing in or near a stream, lake or other waterbody, substances which may degrade water quality. This includes, but is not limited to, human and animal waste, petroleum products, and other hazardous substances. Areas may be closed in order to restrict use in problem areas.

Implementation and responsibility: The public will be encouraged through signs, pamphlets, and public contact to conduct their activities in ways that will not degrade water quality. Pamphlets, brochures, and other material will be used to encourage public coorperation in protecting water quality in dispersed areas. Forest Officers can issue citations to violators.

Monitoring: Forest Officers in both developed and dispersed recreation areas evaluate the implementation and effectiveness of this BMP during visits to various sites.

Soils

The geographic scope for the assessment of the soil resource conditions and potential effects is the entire Rogue River-Siskiyou National Forest. The Rogue River-Siskiyou National Forest is divided into five districts: the analysis for the soil resource is organized, analyzed, and discussed for each of the districts.

The following tables present the soils potentially affected by each of the proposed activities associated with the Proposed Action (Alternative 3), unless otherwise noted.

Table 1. Powers RD. Soils affected by each proposed activity that would result in a change in impact to soils. In Alternatives 4 & 5.

Proposed Activity	Soil Types[1]	Soil Characteristics
Close trail to motorized use (Alternatives 4 & 5)	46D,E 58F	**46D, 46E:** Preacher-Bohannon loams, 3-30%, 30-60% slopes. Deep to moderately deep, well drained, forming in colluviums and residuum from arkosic sandstone and/or siltstone. Hazard of water erosion is moderate. Associated with broad ridgetops, benches, and side slopes of mountains. **58F:** Umpcoos-Rock outcrop association, 70-99% slopes. Located on precipitous mountainsides, narrow ridgetops, and headwalls of mountains. Very gravelly sandy loam, shallow, well drained, forming in colluviums from sandstone. Depth to sandstone bedrock 16 inches, hazard of water erosion is high.

[1]Coos County Soil Survey (USDA NRCS, 1989)

Table 2. Gold Beach RD. Soils affected by each proposed activity that would result in a change in impact to soils.

Proposed Activity	Soil Types[1]	Soil Characteristics
Convert maintenance level 1 roads to motorized trails	55F 56F 73F 78G 79G 87F 91F 103D,E 124E 135F 141G 180F 207E 225E 228F 240E 241E 255E 262F,G 263G	**55F:** Cedarcamp-Snowcamp-Rock outcrop complex, 30-60% north slopes. Very bouldery loams and cobbly clay loams, well drained, formed from serpentinitic peridotite or meta-igneous rock. Hazard of water erosion moderate or severe. Associated with backslopes, ridge crests, shoulders. **56F:** Cedarcamp-Snowcamp-Rock outcrop complex, 30-60% south slopes. Similar to 55F. **73F:** Deadline-Barkshanty-Nailkeg complex, 30-60% south slopes. Channery loams, well drained, formed from schist or phyllite, depth to bedrock 20-60+ inches. Hazard of water erosion moderate or severe. Associated with backslopes, stable benches, narrow summits, shoulders. **78G:** Deadline-Nailkeg complex, 60-90% north slopes. Similar to 73F, with hazard of water erosion very severe. **79G:** Deadline-Nailkeg complex, 60-90% south slopes. Similar to 78G. **87F:** Digger-Remote-Rock outcrop complex, warm, 30-60% south slopes. Similar to 88F, with 25% rock outcrop. **91F:** Digger-Umpcoos-Dystrochrepts complex, warm, 30-60% south slopes. Described above. **103D, 103E:** Edson-Barkshanty complex, 0-15%, 15-30% slopes. Channery loams and clay loams, well drained, formed in schist or phyllite, depth to bedrock 60+ inches. Hazard of water erosion slight. Associated with concave and convex areas of summits. **124E:** Gamelake-Tincup complex, 0-30% slopes. Very gravelly and very cobbly loams, well drained, formed in metasedimentary or metavolcanic rock, depth to bedrock 20-60+ inches. Hazard of water erosion moderate. Associated with concave and convex areas of summits. **135F:** Greggo-Mislatnah-Rock outcrop complex, 30-60% south slopes. Cobbly clay loams, well drained, formed from serpentinitic peridotite or other

Proposed Activity	Soil Types[1]	Soil Characteristics
		serpentinitic rock, depth to bedrock 10-40 inches. Hazard of water erosion severe. Associated with backslopes, narrow summits, shoulders and ridge crests. **141G:** Haplumbrepts-Rock outcrop-Rubble land complex, 60-100% north slopes. Extremely gravelly sandy loams, well drained or somewhat excessively drained, formed from intrusive igneous rock, depth to bedrock 20-70 inches. Hazard of water erosion very severe. Associated with backslopes, ridge crests, shoulders. **180F:** Described above. **207E:** Remote-Digger-Rock outcrop complex, warm, 3-30% slopes. Similar to 87F, with 20% rock outcrop. **225E:** Saddlepeak-Threetrees complex, 15-30% slopes. Very channery loams, well drained, formed from schist or phyllite, depth to bedrock 20-60+ inches. Hazard of water erosion moderate. Associated with concave and convex areas of summits. **228F:** Saddlepeak-Threetrees-Scalerock complex, 30-60% north slopes. Very channery loams, well drained, formed in schist or phyllite, depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe. Associated with backslopes, narrow summits and shoulders. **240E:** Snowcamp-Cedarcamp-Flycatcher complex, 0-30% slopes. Very gravelly and very cobbly loams, well drained, formed in serpentinitic peridotite or meta-igneous rock, depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe. Associated with concave and convex areas of summits, shoulders and knobs. **241E:** Snowcamp-Cedarcamp-Rock outcrop complex, 0-30% slopes. Very bouldery loams, well drained, formed in sepentinitic peridotite or meta-igneous rock, depth to bedrock 20-60+ inches. Hazard of water erosion moderate. Associated with concave and convex areas of summits, ridge crests and shoulders. **255E:** Swedeheaven-Quailprairie-Sankey complex, 0-30% slopes. Gravelly loams and very gravelly sandy clay loams, well drained, formed in metasedimentary or metavolcanic rock, depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe. Associated with concave and convex areas of summits, shoulders and knobs. **262F, 262G:** Threetrees-Saddlepeak-Scalerock complex, 30-60%, 60-90% slopes. Very channery loams, well drained, formed in schist or phyllite, depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe, very severe. Associated with backslopes, narrow summits and shoulders. **263G:** Threetrees-Saddlepeak-Scalerock complex, 60-90% north slopes. Similar to 262G, with very severe water erosion hazard.
New motorized trail construction	17E 87F 103E	**17E:** Barkshanty-Nailkeg-Rock outcrop complex, 0-30% slopes. Channery loams, well drained, formed in schist or phyllite, depth to bedrock 20-60+ inches. Hazard of water erosion moderate. Associated with concave and convex areas of summits, ridge crests, shoulders. **87F:** Described above. **103E:** Described above.
Close trails to motorized use	9F,G 13G 54F 90E 91F 104E 112A 132F 158F	**9F, 9G:** Atring-Kanid-Vermisa complex, 30-60%, 60-90% south slopes. Very gravelly loams, well drained and somewhat excessively drained, formed in metasedimentary rock, depth to bedrock 10-60 inches. Hazard of water erosion moderate or severe, very severe. Associated with backslopes, narrow summits and shoulders. **13G:** Atring-Vermisa complex, 60-90% north slopes. Very gravelly loams, well drained and somewhat excessively drained, formed in metasedimentary rock, depth to bedrock 10-40 inches. Hazard of water erosion very severe. Associated with backslopes, narrow summits and shoulders.

Proposed Activity	Soil Types[1]	Soil Characteristics
	180F 182F 204E 214 241E	**54F:** Cedarcamp-Snowcamp-Flycatcher complex, 30-60% south slopes. Very gravelly and very cobbly loams, well drained, formed in serpentinitic peridotite or meta-igneous rock , depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe. Associated with backslopes, narrow summits and shoulders. **90E:** Digger-Remote complex, warm, 3-30% slopes. Gravelly loams, well drained, formed in metasedimentary or metvolcanic rock, depth to bedrock 20-60+ inches. Hazard of water erosion moderate. Associated with convex and gently sloping areas of summits. **91F:** Described above. **104E:** Eightlar-Gravecreek-Pearsoll complex, 3-30% slopes. Very stony clay loam, very cobbly loam, very cobbly clay loam, well drained, formed in serpentinitic peridotite or other serpentinitic rock, depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe. Associated with concave and convex areas of summits, shoulders, knobs. **112A:** Evans silt loam, 0-3% slopes. Silt loam, well drained, formed in alluvium, depth to bedrock 60+ inches. Hazard of water erosion slight except during flooding. Associated with floodplains. **132F:** Gravecreek-Eightlar-Pearsoll complex, 30-60% south slopes. Similar to 104E, with hazard for water erosion moderate to very severe. **158F:** Kanid-Acker-Atring complex, 30-60% north slopes. Gravelly and very gravelly loams, well drained, formed in metasedimentary rock, depth to bedrock 20-60+ inches. Hazard of water erosion moderate or severe. Associated with backslopes and footslopes. **180F:** Described above. **182F:** Mislatnah-Redflat-Greggo complex, 30-60% north slopes. Cobbly clay loams, gravelly loam, well drained, formed in serpentinitic peridotite or other serpentinitic rock, depth to bedrock 10-60+ inches. Hazard of water erosion moderate or severe. Associated with backslopes, footslopes, narrow summits, shoulders. **204E:** Redflat-Mislatna-Greggo complex, 0-30% slopes. Similar to 182F, but associated with concave and convex areas of summits, shoulders, knobs. **214:** Riverwash. Associated with areas adjacent to rivers and streams that consist of sand and gravel and do not support vegetation. Frequently flooded, with very severe hazard of water erosion. **241E:** Described above.

[1]Curry County Soil Survey (USDA NRCS, 2005)

Table 3. Wild Rivers RD. Soils affected by each proposed activity that would result in a change in impact to soils.

Proposed Activity	Soil Types	Soil Characteristics
Convert maintenance level 1 roads to motorized trails	58F,G[2] 193E[1]	**58F, 58G:** Pearsoll-Rock outcrop complex, 20-60%, 60-90% slopes. Extremely stony clay loam and rock outcrop, shallow, well drained, formed in colluvium derived dominantly from serpentinite and peridotite. Depth to serpentine bedrock 10-20 inches. Hazard of water erosion is high to very high. Associated with mountainsides and highly dissected mountainsides. **193E:** Perdin-Rock outcrop complex, 5-30% slopes. Cobbly loams, gravelly clay loams, and rock outcrop, well drained, formed from serpentinitic peridotite. Depth to bedrock 20-40 inches. Hazard of water erosion is moderate or severe. Associated with convex areas of summits.
Close trails to motorized use	4[2] 7F[2] 8G[2] 9G[2] 10F[2] 23G[2] 24G[2] 25E[2] 26F[2] 47E[2] 48F[2] 61B,D[2] 72F[2] 80G[2] 81G[2] 82G[2]	**4:** Banning loam, 0-3% slopes. Loams and clay loams, deep, somewhat poorly drained, formed in alluvium derived from metamorphic, granitic, and ultramafic rock. Depth to bedrock 60+ inches, seasonal high water table, hazard of water erosion is slight. Associated with alluvial fans and drainageways. **7F:** Beekman-Colestine complex, 50-75% south slopes. Gravelly loam, moderately deep, well drained, formed in colluvium derived from altered sedimentary and extrusive igneous rock. Depth to bedrock 20-40 inches, hazard of water erosion is high. Associated with mountainsides. **8G:** Beekman-Vermisa complex, 60-100% north slopes. Gravelly loam and extremely gravelly loam, moderately deep to shallow, well drained to somewhat excessively well drained, formed in colluvium derived from altered sedimentary and extrusive igneous rock. Depth to bedrock 10-40 inches, hazard of water erosion is high. Associated with mountains. **9G:** Beekman-Vermisa complex, 60-100% south slopes. Similar to 8G. **10F:** Bigelow very gravelly sandy loam, 35-65% slopes. Deep, well drained, formed in colluvium from granitic rock. Depth to compacted glacial till approx. 39 inches, hazard of water erosion is high. Associated with concave areas on mountainsides and glacial basins. **23G:** Crannler very stony sandy loam, 50-90% slopes. Moderately deep, somewhat excessively drained, formed in colluvium and residuum from granitic roak. Depth to bedrock 20-40 inches, hazard of water erosion is high. Associated with convex slopes of mountains. **24G:** Crannler-Rock outcrop complex, 50-100% slopes. Similar to 23G, but with 30% rock outcrop. **25E:** Cryaquepts, 0-30% slopes. Silt loam, moderately deep or deep, somewhat poorly drained or poorly drained, formed in alluvium and colluvium from granitic rock. Depth to bedrock 20-60+ inches. Associated with depressional areas, drainage basins, and mountainsides. **26F:** Cryumbrepts, very steep, 20-75% slopes. Gravelly sandy loam, very shallow to moderately deep, well drained and somewhat excessively drained, formed in colluvium from granitic rock. Depth to bedrock 7-40 inches. Associated with mountainsides. **47E:** Josephine gravelly loam, 20-35% slopes. Similar to 48F, with hazard of water erosion moderate. Associated with mountainsides and ridges. **48F:** Josephine gravelly loam, 35-55% north slopes. Deep, well drained, formed in colluvium and residuum from altered sedimentary and extrusive igneous rock. Hazard of water erosion is high. Depth to bedrock 40-60 inches. Associated with mountainsides. **61B, 61D:** Pollard loam, 2-7%, 12-20% slopes. Deep, well drained, formed in colluvium and alluvium from altered sedimentary and extrusive igneous rock. Hazard of water erosion slight, moderate, depth to bedrock 60+ inches. Associated with terraces, saddles, and hills, mountains.

Proposed Activity	Soil Types	Soil Characteristics
		72F: Speaker-Josephine gravelly loams, 35-55% south slopes. Moderately deep to deep, well drained, formed in colluvium, residuum from altered sedimentary and extrusive igneous rock. Hazard of water erosion high, depth to bedrock 20-60 inches. Associated with mountains. **80G:** Vermisa-Beekman complex, 60-100% north slopes. Similar to 8G. **81G:** Vermisa-Beekman complex, 60-100% south slopes. Similar to 8G. **82G:** Vermisa-Rock outcrop complex, 60-100% south slopes. Similar to 8G but with 30% rock outcrop., shallow, somewhat excessively drained.
Close roads to motorized use (includes roads where permitted/admin use still allowed)	28F[2] 31D,E[2] 32F[2] 33F[2] 47E[2] 58G[2] 80G[2]	**28F:** Dubakella-Pearsoll complex, 35-75% north slopes. Very cobbly and extremely stony clay loams, shallow to moderately deep, well drained, formed in colluviums from serpentinite and peridotite. Depth to bedrock 10 to 40 inches, Hazard of water erosion is high. Associated with mountains. **31D, 31E:** Eightlar extremely stony clay, 5 to 20%, 20 to 35% slopes. Deep, moderately well drained, formed in colluviums and alluvium from serpentinite and peridotite. Hazard of water erosion moderate, depth to clay substratum 61+ inches. Assuciated with mountains and alluvial fans. **32F:** Eightlar-Dubakella complex, 35-65% north slopes. Extremely stony clay and very cobbly clay loams, moderately deep to deep, moderately well to well drained, formed in colluvium from serpentinite and peridotite. Similar to 28F and 31D, E descriptions. **33F:** Eightlar-Dubakella complex, 35-65% south slopes. Similar to 32F. **47E:** Described above. **58G**: Described above. **80G:** Described above.

[1]Curry County Soil Survey (USDA NRCS, 2005)
[2]Josephine County Soil Survey (USDA NRCS, 1983)

Table 4. Siskiyou Mountains RD. Soils affected by each proposed activity that would result in a change in impact to soils.

Proposed Activity	Soil Landtypes[3]	Soil Characteristics
New motorized trail construction	69 619 (65% 61 / 35% 69) 689 (60% 68 / 40% 69)	**69:** Soils are sandy loams, loams and silty clay loams containing 50-80% gravel, cobble and stone, forming in unconsolidated, non-cohesive, landslide debris, somewhat poorly to well drained, Stability Class V (very unstable). Depth to bedrock from 6 to 12+ feet. Associated with steep and uneven landslide toe slope positions with 45-80% slopes. **68:** Soils are similar to 69 soils, with Stability Class III (moderately stable). Associated with gently rolling to moderately steep, hummocky landslide mid-slopes with 15-45% slopes. **61:** Soils are loams and fine sandy loams containing 50-85% platy gravels and cobbles, forming in colluvium, somewhat excessively drained, Stability Class III (moderately stable). Depth to bedrock from 1-3 feet. Associated with slightly to moderately dissected, long, straight, very steep side slopes with 60-90% slopes.
Close trails to motorized use	57 93 99 542 (65% 54 / 35% 92) 593 (60% 59 / 40% 93) 793 (35% 70 / 35% 59 / 30% 93)	**54:** Soils are sandy loams and loams containing 35-65% gravel, cobble and stone, forming in glacial till deposits, well drained, Stability Class III and IV (moderately stable to unstable). Depth to bedrock 6-12 feet. Associated with moderately to highly dissected very steep slopes associated with glacial trough walls with 60-90% slopes. **57:** Soils are loams and clay loams containing 50-90% gravel,

Proposed Activity	Soil Landtypes[3]	Soil Characteristics
		cobble and stone, forming in residuum and colluvium, well drained, Stability Class II (stable). Depth to bedrock from 2-4 feet. Associated with side slopes and ridges associated with ultramafic, serpentinized igneous intrusions with 20-70% slopes. **59:** Soils are loams, clay loams and clays containing 50+/-% cobble and stone, forming in colluvium (high percentage mafic coarse fragments), well drained, Stability Class IV and V (unstable to very unstable). Depth to bedrock 6-12+ feet. Associated with moderately steep to steep, somewhat rounded and dissected slopes occurring along fault zones or in association with mafic or ultra mafic intrusions with 45-75% slopes. **70:** Soils are mostly loams and clay loams containing 45-60% gravel and cobble, forming in colluvium, well drained, Stability Class III and IV (moderately unstable to unstable). Depth to bedrock 2-4 feet. Associated with highly dissected, long, steep to very steep, straight side slopes with 55-80% slopes. **92:** Perennially wet alder glades with wet soils of variable composition and slope, commonly in draws and basins. **93:** Large rock outcrops and associated talus fields, various kinds of rock represented, commonly occur along ridge tops and southern exposures. **99:** Old landflows and landslide deposits consisting of interconnected steep slopes and benches, formed by mass movement processes, result in churned soil deposits with poor to excessive drainage. Highly variable site-to-site.

[3]SRI for the Rogue River National Forest (Badura and Jahn, 1977)

Table 5. High Cascades RD. Soils affected by each proposed activity that would result in a change in impact to soils.

Proposed Activity	Soil Landtypes[3]	Soil Characteristics
Develop motorized play area	24	Soils are sandy loams forming in cindery glaciofluvial deposits, excessively drained, Stability Class I (very stable). Depth to bedrock generally greater than 12 feet. Associated with sandy flats of glaciofluvial origin.

[3]SRI for the Rogue River National Forest (Badura and Jahn, 1977)

Serpentine/ultramafic geology and soils with the potential for naturally occurring asbestos

DATA SOURCES:

The map of areas with the potential for naturally occurring asbestos was derived from the USDA Forest Service Region 5 corporate bedrock GIS layer, the Oregon Geologic Data Compilation (OGDC) - Release 5 (Oregon DOGAMI 2009), the NRCS Soil Surveys for Coos County OR (USDA 1989), Curry County OR (USDA 2005), and Josephine County OR (USDA 1983), and the Rogue River National Forest Soil Resource Inventory (Badura and Jahn 1977).

For the USDA FS R5 corporate bedrock GIS layer, the following lithostratigraphic types were queried: chromitite, clinopyroxenite, dunite, harzburgite, hornblendite, lherzolite, mélange serpentine-matrix, peridotite, pyroxenite, serpentinite, and ultramafic.

For the OGDC-5 layer, the following categories were queried: metamorphic / sedimentary / ultramafic rocks, metamorphic / ultramafic rocks, metamorphosed metamorphic / ultramafic / volcanic rocks, metamorphosed ultramafic rocks, plutonic / ultramafic rocks, ultramafic rocks, and ultramafic / volcanic rocks.

The following RR SRI Soil Landtype Units with ultramafics were queried: 57, 58, 59, 503, 505, 515, 519, 535, 545, 557, 560, 571, 573, 575, 585, 587, 593, 597, 715, 718, 757, 793, and 795.

Curry County OR soil units with the following soil series were queried: Cedarcamp, Eightlar, Flycatcher, Gravecreek, Greggo, Mislatnah, Pearsoll, Serpentano, and Snowcamp.

Coos County OR soil units with the following soil series were queried: Serpentano.

Josephine County OR soil units with the following soil series were queried: Brockman, Brockman Variant, Cornutt, Dubakella, Eightlar, Pearsoll, Perdin, Takilma, and Takilma Variant.

Appendix E

Current Forest Orders Summary

This Appendix presents current Forest Orders as of 2009 for the Rogue River-Siskiyou National Forest. Gaps in order numbers reflect orders that were temporary in nature (e.g. fire closures) or were (1) outdated or (2) replaced/combined with a new order.

Regional Forester Orders

Order No.	Order Date	Termination Date	Prohibition
88-4	08-31-88		PCT – Possessing a bicycle
2	06-01-87		Internal Combustion Engines on NF System lands June 1- Oct 31
3	06-01-87		IFPLs on NF System lands
R06-2009-001	02-10-09		Weed Free Hay and Crop Products
R06-2013-01	08-21-13		Fireworks
R06-2013-02	08-21-13		Explosives and Exploding Targets

Rogue River-Siskiyou NF Forest Orders

Order No.	Order Date	Termination Date	Prohibition
RSF-063	05-27-2005	12-31-2009	Chetco; Illinois River Tr. Year-round closure
RSF-064	05-27-2005	12-31-2009	Chetco; Illinois River Tr. Seasonal Closure
RSF-074	08-xx-2005	BLM ISSUED	Blossom Fire – Waterway Closure
RSF-083	06-01-2006	12-31-2011	OCC & USE
RSF-097	05-31-2007	05-31-2012	Sky Lakes/Red Butte Wilderness w/Fremont/Winema
RSF-098	05-21-2007	05-31-2012	Rogue/Siskiyou Wilderness
RSF-101	07-23-2007	07-31-2012	Re-issue RRF-044, Ashland WS OHV
RSF-105	10-22-2007	10-31-2012	Prospect OHV (Green Dot)
RSF-106	12-17-2007	11-30-2012	Vehicle off road – Low Gap Area
RSF-107	01-17-2008	05-31-2008	Reissue RSF-096, Francis Shrader Trail Closure
RSF-108	01-22-2008	12-31-2012	Japanese Bomb Site Trail
RSF-109	02-05-2008	12-31-2012	Big Tree Obs Site
RSF-128	04-23-2009	12-31-2013	OR Mtn Botanical Area Rd Closure–Wild Rivers RD
RSF-129	04-20-2009	07-24-2009	McKee Day Use Area Closure – Sis Mtn RD
RSF-130	04-10-2009	05-01-2013	Prospect Winter Rec. Road Closures (old RRF-049)
RSF-131	05-22-2009	05-31-2014	Illinois River Rd: fire rings / parking
RSF-132	06-02-2009	06-01-2014	Prospect OHV – (old RSF-091)
RSF-133	06-04-2009	06-16-2009	Temp Area Closure, SAR Training, Wild Rivers RD
RSF-134	02-17-2011	02-29-2016	$8 Botanical Area, Wild Rivers (old SIF-054)
RSF-135	06-15-2009	06-21-2009	McGrew Trail Temp Closure
RSF-136	06-17-2009	07-14-2009	#1 PUR W/S Rogue River
RSF-137	06-26-2009	06-28-2009	Temp Rd Closure at Green Bridge
RSF-138	07-14-2009	07-24-2009	#2 PUR W/S Rogue River
RSF-139	07-24-2009	07-31-2014	McKee Bridge Day Use - No Alcohol

Order No.	Order Date	Termination Date	Prohibition
RSF-141	07-29-2009	09-29-2009	Campfire Closure, Forest-wide
RSF-142	08-08-2009	08-21-2009	Golden Stairs Fire Closure
RSF-143	09-29-2009	10-13-2009	Fire PURs, Sis Mtn Zone
RSF-144	10-16-2009	11-30-2009	Timber sale area road closure – High Cascades RD
RSF-145	02-25-2010	12-31-2010	Rancheria Bridge Closure - WRRD
RSF-146	06-09-2010	07-26-2010	Redwood Nature Trail
RSF-147	06-24-2010	11-26-2010	Joe Ck Rd Temp Closure
RSF-148	06-29-2010	07-15-2010	#1 PUR W/S Rogue River
RSF-149	08-04-2010	07-31-2015	Illinois River Trail Area Closure
RSF-150	08-04-2010	07-31-2015	Illinois River Trail Seasonal Closure
RSF-151	08-04-2010	07-31-2015	Illinois River Trail Year round Closure
RSF-152	07-13-2010	08-05-2010	#2 PUR W/S Rogue River
RSF-153	08-04-2010	09-10-2010	#3 PUR W/S Rogue River
RSF-154	08-17-2010	09-10-2010	Oak Flat Fire Rd/Trail/CG Closures, WRRD
RSF-155	08-18-2010	09-13-2010	Campfire Closure SM/WR RD
RSF-156	08-24-2010	08-25-2010	Cedar Ck Fire Rd/Trail Closures, GBRD WRRD
RSF-157	08-25-2010	09-09-2010	Cedar Ck Fire Rd/Trail Closures, GBRD
RSF-158	08-26-2010	09-10-2010	Oak Flat Fire Rd Closure 2, WRRD
RSF-159	09-10-2010	09-21-2010	#2 PUR W/S Rogue River
RSF-160	09-21-2010	10-25-2010	#1 PUR W/S Rogue River
RSF-161	10-25-2010	10-31-2015	Joe Ck Rd(1060)/ Blue Ledge Mine Closure
RSF-162	11-10-2010	04-30-2015	Mule Mountain Winter Range Closure
RSF-163	12-17-2010	02-01-2011	FSR 3740 Temp Rd Closure
RSF-164	02-02-2011	02-01-2016	Joe Ck Rd Closure (Harlow Cabin)
RSF-165	07-01-2011	08-01-2011	#1 PUR W/S Rogue River
RSF-166	08-01-2011	08-26-2011	#2 PUR W/S Rogue River
RSF-167	10-13-2011	10-13-2016	Forest Trail Bridges Closures
RSF-168	08-23-2011	10-31-2011	Tin Cup
RSF-169	08-xx-2011	08-xx-2016	WS Rogue Year round fire closure
RSF-170	08-26-2011	09-26-2011	#3 PUR W/S Rogue River
RSF-171	09-12-2011	09-27-2011	Wheeler Ck Temp Closure
RSF-172	09-13-2011	09-30-2011	Campfire Closure HC/SM/WR RD
RSF-173	09-26-2011	10-05-2011	Bear Camp Culvert – Temp Closure
RSF-174	09-26-2011	11-30-2011	#2 PUR W/S Rogue River
RSF-175	09-25-2011	09-28-2011	Lonesome Fire
RSF-176	09-28-2011	10-04-2011	Wheeler Ck Temp Closure (reissue to extend date)
RSF-177	11-14-2011	12-15-2011	TinCup (reissue to extend date of RSF-168)
RSF-178	03-07-2012	02-28-2013	Occ and Use (updated RSF-083)
RSF-179	05-18-2012	08-01-2012	Signal Buttes Botanical Area - Temp closure GBRD
RSF-180	06-08-2012	09-30-2013	SOD - GBRD
RSF-181	07-11-2012	10-17-2102	#2 PUR W/S Rogue River
RSF-182	08-08-2012	08-11-2012	Red Buttes Fire Road/Trails Closure
RSF-183	08-07-2012	08-15-2012	Red Buttes Fire, SMRD Campfire PURs
RSF-184	08-23-2012	09-28-2012	FSR 4611 Temp Closure, WRRD
RSF-185	08-??-2012	10-30-2012	Fort Complex Fire Area Closure, SMRD
RSF-186	08-15-2012	10-30-2012	Forest Wide Campfire Closure
RSF-187	08-16-2012	10-30-2012	#3 PUR W/S Rogue River
RSF-188	08-18-2012	08-31-2012	Fort Fire Rd 1040 and 4 trails closure
RSF-189	08-23-2012	09-24-2012	Forest Wide PURs

Order No.	Order Date	Termination Date	Prohibition
RSF-190	08-31-2012	09-14-2012	Goff Fire Area Closure
RSF-191	09-14-2012	10-15-2012	Goff Fire Trails Closure
RSF-192	09-24-2012	10-16-2012	Forest Wide PURs – reissue w/changes
RSF-193	10-24-2012	12-05-2012	AFR Area Closure, SMRD
RSF-194	03-08-2013	02-15-2014	Low Gap (Hinkle Lake) re-issue RSF-106
RSF-195	03-07-2013	05-03-2013	AFR Area/Rd closure, SMRD
RSF-196	04-02-2013	04-01-2014	Occ & Use (Re-issue RSF-178)
RSF-197	05-06-2013	08-07-2013	FSR 4611 Temp Closure, WWRD (MP 0.0-7.2)
RSF-198	05-29-2013	05-28-2014	FSR 1040 MP3.9 Bridge, Temp Wt Restrict. SMRD
RSF-199	07-02-2013	07-23-2013	#2 PUR W/S Rogue River
RSF-200	08-07-2013	09-30-2013	FSR 4611.070 Temp Closure, WWRD
RSF-201	07-02-2013	06-28-2014	FSR 6510.300 Flat Ck Bridge, HCRD
RSF-202	10-01-2013	10-19-2013	Prospect OHV (Green Dot)
RSF-203	07-15-2013	08-10-2013	Forest Wide PURs
RSF-204	07-23-2013	09-18-2013	#3 PUR W/S Rogue River
RSF-205	07-29-2013	08-08-2013	Labrador Fire Closure/Illinois Valley Area
RSF-206	07-29-2013	08-28-2013	Bear Camp/Burnt Ridge Rd Closures
RSF-207	08-08-2013	09-11-2013	Labrador Fire Closure/Illinois Valley Area-RE-ISSUE
RSF-208	08-10-2013	08-28-2013	Forest Wide PURs No Open Flame
RSF-209	08-28-2013	09-18-2013	Forest Wide PURs
RSF-210	08-28-2013	09-03-2013	Bear Camp/Burnt Ridge Rd Closures (Ext date)
RSF-211	09-23-2013	09-30-2015	SOD – GBRD (extend RSF-180)
RSF-212	09-18-2013	09-23-2013	#2 PUR W/S Rogue River
RSF-213	11-07-2013	11-15-2013	FSR 6400000 Temp Closure
RSF-214	12-04-2013	12-06-2013	FSR 4611000 MP 3.2 Temp Closure
RSF-215	01-16-2014	12-31-2018	OR Mtn Botanical Area Rd Closure–Wild Rivers RD (reissue RSF-128)
RSF-216	01-10-2014	09-01-2014	FSR 1376 Temporary Closure
RSF-217	03-26-2014	03-15-2015	Re-Issue RSF-194 Low Gap (Hinkle Lake)
RSF-218	03-26-2014	03-25-2019	Occ & Use (Re-issue RSF-196)

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Appendix F

Proposed Actions Triggering the Port-Orford-Cedar Risk Key

The Port-Orford-cedar (POC) Risk Key is used to clarify the environmental conditions that require implementation of one or more of the disease controlling management practices listed in the Record of Decision (ROD) and Land and Resource Management Plan Amendment for Management of Port-Orford-cedar in Southwest Oregon Siskiyou National Forest. Project-specific NEPA analysis will appropriately document the application of the risk key and the consideration of the available management practices. Application of the risk key and application of resultant management practices (if any) will make the project consistent with the mid- and large-geographic and temporal-scale effects described by the SEIS analysis, and will permit the project analysis to tier to the discussion of those effects (USDA FS 2004).

Port-Orford-Cedar Risk Key[*]

This is a site-specific analysis to help determine where risk reduction management practices would be applied.

1a. Are there uninfected POC within, near[7], or downstream of the activity area whose ecological, Tribal, or product use or function measurably contributes to meeting land and resource management plan objectives?

YES

1b. Are there uninfected POC within, near[8] or downstream of the activity area that, were they to become infected, would likely spread infections to trees whose ecological, Tribal, or product use or function measurably contributes to meeting land and resource management plan objectives?

YES

1c. Is the activity area within an uninfested 7th field watershed[2]?

YES

If the answer to all three questions, 1a, 1b, and 1c, is no, then risk is low and no POC management practices are required. If the answer to any of these three questions is yes, continue.

2. Will the proposed project introduce appreciable additional risk[3] of infection to these uninfected POC?

YES (as identified below)

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[*] In questions 1a and 1b, "near" generally means within 25 to 50 feet downslope or 25 feet upslope from management activity areas, access roads, or haul routes; farther for drainage features; 100 to 200 feet in streams.

[7] Uninfested 7th field watersheds are those with at least 100 acres of POC stands, are at least 50% federal ownership, and are free of PL except within the lowermost 2 acres of the drainage.

[8] Appreciable additional risk does not mean "any risk." It means that a reasonable person would recognize risk, additional to existing uncontrollable risk, to believe mitigation is warranted and would make a cost-effective or important difference.

Alternative 1:

This alternative does not prohibit cross-country travel or propose to add new routes to the NFTS. Alternative 1 carries the highest risk of *Phytophthora lateralis* (PL) spread and new root disease sites as all POC populations on the forest outside of specially designated areas closed to motorized vehicle use would potentially be accessible to OHVs. All POC populations outside of specially designated areas would be considered high risk sites as they all would potentially be within 50 feet of an OHV route.

Because no new routes are proposed by Alternative 1, the POC Risk Key would not be triggered by this Alternative.

Alternative 2:

Alternative 2 would designate the current condition of motorized uses with Plan Amendments to allow consistency with the Travel Management Rule and resolve currently inconsistent Forest Plan direction. To the extent that motorized vehicle use is reduced in areas of POC and PL, the potential for importing PL onto sites with healthy POC and exporting PL off infested sites would be reduced. The effects of Alternative 2 would be essentially the same as those described in Alternative 1.

Because no new routes are proposed by Alternative 2, the POC Risk Key would not be triggered by this Alternative.

Alternative 3:

Alternative 3 would reduce risk to POC that measurably contributes to meeting management objectives on the Rogue River-Siskiyou National Forest by designating roads, trails, or areas for motorized vehicle use compared to the current situation. Designating specific areas for motorized use reduces the potential to export PL off infested sites and import PL onto uninfested sites as the area utilized for motor vehicle use declines.

There are three proposed changes in Alternative 3 that would introduce additional appreciable risk:

1) .05 mile of new motorized trail (Woodruff) in Township 36 South, Range 13 West, section 9. Access to the new trail from the west passes through a PL infested area;

2) 4.8 miles of Maintenance Level 1 roads in the Signal Butte area being proposed for conversion into motorized trails[9]**;** and

3) 2.7 miles of a Maintenance Level 1 road to access Biscuit Hill are being proposed for conversion into a motorized trail.

These proposed road to trail conversions pass through both healthy and PL infested areas of POC. While this is a proposed change from the current condition, these areas currently receive OHV use due to the accessibility of the area's Maintenance Level 1 roads and openness of the terrain.

Below are tables that summarize the areas triggering the POC Risk Key.

[3] Portions of these routes were removed from the baseline inventory in the FSEIS; see section D, 3, Chapter II and FSEIS Appendix I for more detail.

1):

New Trail (Woodruff) Through POC			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
Woodruff (None Assigned)	MC-POC	0.5	6
Woodruff (None Assigned)	PL-Infested	< 0.1	1.3

Woodruff Access Routes Through POC			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
None Assigned	MC-POC	0.8	8.8
3313020	MC-POC	1.2	17.8
None Assigned	PL-Infested	< 0.1	0.1

2):

Signal Butte ML 1 Conversions to Motorized Trails			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
3300116	MC-POC	< 0.1	1
3313103	MC-POC	0.2	1.1
3313110	MC-POC	0.8	20.4
3313117	MC-POC	0.3	7.4
3680195	MC-POC	0.6	16.7
3680220	MC-POC	0.5	6.2
3313	MC-POC	0.2	2.1
3313103	PL-Infested	<0.1	0.5
3313110	PL-Infested	1.1	24.3
3680190	PL-Infested	0.4	9.5
3680220	PL-Infested	1.1	24.7
3313	PL-Infested	0.6	12.2
Access Routes into Signal Butte Area			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
3300	MC-POC	3.8	78.4
3300090	MC-POC	1.6	36.1
3313	MC-POC	14.2	117.3
3313102	MC-POC	<0.1	<0.1
33131000	MC-POC	1	5.7
3680220	MC-POC	0.5	11.7
3300	PL-Infested	0.8	17.8
3300090	PL-Infested	0.8	11
3313	PL-Infested	2.9	70.5
3313100	PL-Infested	1.1	22.1
3313102	PL-Infested	0.4	8.8
3680220	PL-Infested	<0.1	0.3

3):

Biscuit Hill ML 1 Conversion to a Motorized Trail			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
4402494	MC-POC	0.2	0.5

Access Routes into Biscuit Hill Area			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
4402112	MC-POC	0.4	1.5
4402019	MC-POC	0.1	0.7
4402	PL-Infested	0.7	2.5

By implementing a combination of management practices contained in the mitigation section of Chapter II of the FSEIS document, no additional effects, direct or indirect are anticipated from the proposed changes. In addition, since these areas are currently receiving use by OHVs without the implementation of mitigation measures to abate the spread of PL, **the proposed road and trail changes that would trigger the Risk Key and resultant management practices could decrease the likelihood of PL spread**.

Alternative 4:

Alternative 4 would reduce risk to POC that measurably contributes to meeting management objectives on the Rogue River-Siskiyou National Forest by designating roads, trails, or areas for motorized vehicle use compared to the current situation. Designating specific areas for motorized use reduces the potential to export PL off infested sites and import PL onto uninfested sites as the area utilized for motor vehicle use declines.

This Alternative has the greatest potential to reduce the spread of PL. This is because Alternative 4 proposes the most restrictive use of motorized vehicles within MC-POC and PL areas. All of the items in Alternative 3 requiring implementation of one or more of the POC Management practices are not present in Alternative 4. Therefore, no appreciable additional risk to POC that measurably contribute to meeting management objectives is occurring within this alternative.

Because no new routes are proposed by Alternative 4, the POC Risk Key would not be triggered by this Alternative.

Alternative 5:

Alternative 5 would reduce risk to POC that measurably contributes to meeting management objectives on the Rogue River-Siskiyou National Forest by designating roads, trails, or areas for motorized vehicle use compared to the current situation. Designating specific areas for motorized use reduces the potential to export PL off infested sites and import PL onto uninfested sites as the area utilized for motor vehicle use declines.

Under Alternative 5, only one of the proposed changes in Alternative 3 requiring implementation of one or more of the POC Management practices is included:

1) 4.8 miles of Maintenance Level 1 roads in the Signal Butte area being proposed for conversion into motorized trails[10].

Below are tables that summarize the areas triggering the POC Risk Key.

Signal Butte ML 1 Conversions to Motorized Trails			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
3300116	MC-POC	< 0.1	1
3313103	MC-POC	0.2	1.1
3313110	MC-POC	0.8	20.4
3313117	MC-POC	0.3	7.4
3680195	MC-POC	0.6	16.7
3680220	MC-POC	0.5	6.2

Signal Butte ML 1 Conversions to Motorized Trails			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
3313	MC-POC	0.2	2.1
3313103	PL-Infested	<0.1	0.5
3313110	PL-Infested	1.1	24.3
3680190	PL-Infested	0.4	9.5
3680220	PL-Infested	1.1	24.7
3313	PL-Infested	0.6	12.2

Access Routes into Signal Butte Area			
Route Number	**POC Type**	**Total Miles**	**Total Acres**
3300	MC-POC	3.8	78.4
3300090	MC-POC	1.6	36.1
3313	MC-POC	14.2	117.3
3313102	MC-POC	<0.1	<0.1
33131000	MC-POC	1	5.7
3680220	MC-POC	0.5	11.7
3300	PL-Infested	0.8	17.8
3300090	PL-Infested	0.8	11
3313	PL-Infested	2.9	70.5
3313100	PL-Infested	1.1	22.1
3313102	PL-Infested	0.4	8.8
3680220	PL-Infested	<0.1	0.3

[10] Portions of these routes were removed from the baseline inventory in the FSEIS; see section D, 3, Chapter II and FSEIS Appendix I for more detail

By implementing a combination of management practices contained in the mitigation section of Chapter II of this document, no additional effects, direct or indirect are anticipated from the proposed changes. In addition, since these areas are currently receiving use by OHVs without the implementation of mitigation measures to abate the spread of PL, **the proposed road and trail changes that would trigger the Risk Key and resultant management practices could decrease the likelihood of PL spread.**

Appendix G

Aquatic Biota

Biological Evaluation & Specialist Report

Motorized Vehicle Use
on the
Rogue River-Siskiyou National Forest

I. TITLE PAGE

Project Name: Motorized Vehicle Use on the Rogue River-Siskiyou National Forest (RRSNF)

Project Location: USDA Forest Service, Rogue River-Siskiyou National Forest

Table G-1. Fifth Field Watersheds within the Project Area

Fifth Field		Fifth Field
Althouse Creek		Little Applegate River
Bear Creek		Little Butte Creek
Big Butte Creek		Lobster Creek
Briggs Creek		Lower Applegate River
Chetco River		Middle Applegate River
Deer Creek		North Fork Smith River
East Fork Illinois River		Pistol River
Elk Creek		Rogue River
Elk River		Shasta Costa Ck-Rogue River
Euchre Creek-Frontal Pacific		Silver Creek
Headwaters Applegate Riv.		Sixes River
Headwaters Rogue River		South Fork Coquille River
Hellgate Canyon-Rogue River		South Fork Rogue River
Hunter Creek		Stair Creek-Rogue River
Indian Creek		Sucker Creek
Indigo Creek		Upper Applegate River
Josephine Ck-Illinois River		West Fork Cow Creek
Klondike Ck-Illinois River		West Fork Illinois River
Lawson Ck-Illinois River		Winchuck River

Table G-2. Watershed Analysis Completed within the Project Area

Watershed, Year Completed	Watershed, Year Completed
Bear Creek, 1995	Lower Illinois, 2000
Beaver-Palmer, 1994	Lower Rogue, 1995
Bradford Creek, 1996	Middle Applegate, 1998
Briggs Creek, 1994	Middle Illinois, 1999
Cheney/Slate, 1996	North Fork Smith River, 1995
Chetco River, 1996	Pistol River, 2003
Collier Creek, 1997	Quosatana Creek,1996
Deer Creek, 1997	Rogue River above Galice, 1995
East Fork Illinois River, 2000	Rogue River below Agness, 2000
Elk Creek, 1996	Rogue River Marial/Agness, 1999
Elk River, 1998	SF Coquille River, 1995
Grayback/Sucker 1998	Shasta Costa Creek, 1996
Horse Sign Creek, 1998	Silver Creek, 1995
Hunter Creek, 1998	Sixes River, 1997
Indigo Creek, 1998	Squaw/Elliott/Lake, 1995
Kalmiopsis Wilderness, 1995	Upper Bear Creek, 2003
Lawson Creek, 1997	Upper Big Butte Creek, 1995
Little Applegate River, 1995	Upper Rogue River, 1995
Little Butte Creek, 1997	West Fork Illinois, 1997
Lobster Creek, 1999	Winchuck River, 1999

Land Allocation of Project Area:	Administrative Study Area (MA-15) Backcountry Recreation (MA-6) Botanical (MA-4) Late Successional Reserve (MA-8) Matrix (MA-14) Riparian Reserve (MA-11) Special Wildlife Site (MA-9)
Administrative Unit:	Rogue River-Siskiyou National Forest (RRSNF): Gold Beach, High Cascades, Powers, Siskiyou Mountains, and Wild Rivers Ranger Districts
Prepared By:	Steve Brazier, Fisheries Biologist, RRSNF
Reviewed By:	Susan Maiyo, Forest Fisheries Biologist, RRSNF
Document Date:	*Revised* June 24, 2014

II. BIOLOGICAL EVALUATION BACKGROUND INFORMATION

The Biological Evaluation process (FSM 2672.43) is intended to conduct and document activities necessary to ensure Proposed Actions will not likely jeopardize the continued existence or cause adverse modification of habitat for:

A. Fish species listed or proposed to be listed as **Endangered** (E) or **Threatened** (T) or **Proposed** for Federal listing (P) by the National Marine Fisheries Service.

B. Fish species listed as **Sensitive** (S) by USDA, Forest Service.

Threatened, Endangered, Sensitive, and Proposed Fish Species (TESP)

In compliance with Section 7 of the Endangered Species Act (ESA) and the Forest Service Biological Evaluation process for TESP fish species, the list of species potentially occurring within the project area was reviewed. Lists for the Rogue River-Siskiyou National Forest (RRSNF) and the Pacific Northwest Region (R-6) were reviewed in regard to potential effects on any of these species by actions associated with the Motorized Vehicle Use Project. Pre-field and reconnaissance results are summarized in the table below.

Table G-3. Potentially Affected Species, Status, and Habitats Assessed (Pacific Northwest Regional Forester's Sensitive Species List updated December 2011, USDA 2011)

Species/Habitat		Pre-field Review	Field Surveys
Common name	**Scientific Name**	**Existing Sighting or Potential Habitat (Yes*/No**)**	**Habitat or Species Confirmed (Yes*/No**)**
ESA Threatened Species			
SONCC Coho Salmon	*Oncorhynchus kisutch*	Yes	Yes
OC Coho Salmon	*O. kisutch*	Yes	Yes
S. DPS North American Green Sturgeon	*Acipenser medirostris*	No	No
S. DPS Pacific Eulachon	*Thaleichthys pacificus*	No	No
ESA Critical Habitat (CH)			
SONCC Coho Salmon	*O. kisutch*	Yes	Yes
OC Coho Salmon	*O. kisutch*	Yes	Yes
MSA Essential Fish Habitat (EFH)			
Coho Salmon	*O. kisutch*	Yes	Yes
Chinook Salmon	*O. tshawytscha*	Yes	Yes
R6 Forester's Sensitive Species			
Fish			
SONCC Chinook Salmon	*O. tshawytscha*	Yes	Yes
PC Chum Salmon	*O. keta*	No	No
OC steelhead	*O. mykiss*	Yes	Yes
Mollusk			
Western ridged mussel	*Gonidea angulata*	No	No
Highcap lanx	*Lanx alta*	No	No
Scale lanx	*L. klamathensis*	No	No
Robust walker	*Pomatiopsis binneyi*	No	No
Pacific walker	*P. californica*	No	No
Insect			
Haddock's Rhyacophilan caddisfly	*Rhyacophila haddock*	No	No
A caddisfly	*Namamyia plutonis*	No	No

***Yes** – The proposed project's potential effects on these species will be further analyzed in this document.
****No** – No further analysis is necessary, and a determination of "No Impact" is rendered.

III. DESCRIPTION OF THE PROPOSED ALTERNATIVES

On November 9, 2005, the *Final Rule for Travel Management; Designated Routes and Areas for Motor Vehicle Use* (hereafter referred to as Travel Management Rule) was published in the Federal Register; affecting 36 Code of Federal Regulations (CFR) parts 212, 251, 261, and 295. The Rule revises several regulations to require designation of roads, trails, and areas for motor vehicle use on National Forests and National Grasslands.

Highlights of the Travel Management Rule include: each National Forest or Ranger District will designate those roads, trails, and areas open to motor vehicles: designation will include class of vehicle and, if appropriate, season of use for motor vehicle. Once the designation process is complete, the rule will prohibit motor vehicle use off the designated system and use that is inconsistent with the designations.

The actions of the project can be divided into three Project Elements and are described below:

1) *Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use (**Alternative 2, 3, 4, and 5**[**Action Alternatives**]).*

2) *Close Areas to Cross-Country Motorized Travel (**Alternatives 2, 3, 4, and 5**).*

3) *Convert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, Prohibit Motorized Public Use, and Construct Motorized Trail (**Alternatives 3, 4, and 5**).*

Table G-4. Proposed Alternatives with Activities

Alternative	Project Element 1 (administrative only)	Project Element 2	Project Element 3						
	Enact Forest and District-wide plan amendments.	Close Areas to Cross—Country Motorized Travel (acres)	Convert ML1 Road to Motorized Trail (miles)	Prohibit Motorized use of an existing Trail (miles)	Prohibit motorized Mixed Use (miles)	Designate Motorized Mixed Use (miles)	Prohibit Motorized Public Use (miles)	Construct Motorized Trail (miles)	Develop Motorized Play Area (acres)
1	0	0	0	0	0	0	0	0	0
2	Forest-wide	275,000	0	0	0	0	0	0	0
3	Forest-wide	275,000	13.91	31.51	24.48	36.83	14.64	1.48	10.0
4	Forest-wide	275,000	0	128.71	24.92	0.14	51.45	0	0
5	Forest-wide	275,000	9.56	36.82	24.48	0.17	14.64	1.18	0

Alternative 1 – No Action

Under the No Action Alternative, the existing condition, as reflected in the Forest route inventory and analysis of the transportation system originally analyzed in 2008 with updates throughout this process, would continue. These existing routes on the Forest would primarily be used for public wheeled motor vehicle use. Cross-country travel and route proliferation would still occur in isolated areas on the Forest. Areas for dispersed activities would continue to be used by public wheeled motor vehicles, primarily for the purpose of dispersed camping and parking. No changes would be made to the current National Forest transportation system and no cross-country travel prohibition would occur.

Alternative 2

Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use – similar to all Action Alternatives. Two separate Forest Plans guide the Rogue River-Siskiyou National Forest.

District-Specific Activities

Gold Beach Ranger District

- Amend the Siskiyou LRMP to make current motorized use of the Game Lake Trail (#1169), Lawson Creek Trail (#1173), Illinois River Trail (#1161), Silver Peak Hobson Horn Trail (#1166), and an unnamed connector trail consistent with the Standards and Guidelines for the Allocations through which they pass (Backcountry Recreation).

Wild Rivers Ranger District

- Amend the Siskiyou LRMP to make motorized use of the Boundary Trail (#1207) consistent with Standards and Guidelines for the allocations in which it passes through (Research Natural Area).

Siskiyou Mountains Ranger District

- Amend the Rogue River LRMP to make motorized use of the Boundary Trail (#1207) and two connecting trails (#900 and #903) consistent with Standards and Guidelines for the allocations in which it passes through.

Close Areas to Cross-Country Motorized Travel

Similar to all the Action Alternatives, Alternative 2 would close approximately 275,000 acres of the RRSNF to cross-country motorized travel. While these 275,000 acres are currently available for cross-country motorized travel, much of this acreage is incapable of supporting this use due to steep topography and other natural landforms.

Alternative 3 – Proposed Action

The Proposed Action is based on the Forest's analysis of the transportation system process and focuses on the change from the current condition. It aims to strike a balance for various forms of motorized use by identification of sustainable motorized use opportunities with minimal adverse resource impacts, and enacting the Travel Management Rule.

Under the Proposed Action, amendments to the Rogue River and Siskiyou Land and Resource Management Plans would provide consistency with the 2005 Travel Management Rule. All roads and trails and areas would be closed to motorized use unless designated as open.

Under the Proposed Action (Alternative 3), the Forest proposes to:

Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use

- Similar to Alternative 2.

Close Areas to Cross-Country Motorized Travel

- Similar to Alternative 2.

C*onvert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, Prohibit Motorized Public Use, and Construct Motorized Trail*

- Similar to all the Action Alternatives, formally designate approximately 3,167 miles of road where mixed use would be allowed. Mixed use is defined as designation of a National Forest System (NFS) road for use by both highway-legal and non-highway-legal motor vehicles.
- Construct two motorized trails to provide loop route opportunities (approximately 2 miles).
- Convert approximately 11 miles of NFS roads to motorized trails.
- Designate two areas where off-road motorized use would be allowed. This includes continued use of the Woodruff area near Prospect and the development of an additional area near Willow Lake. Both areas are located on the High Cascades Ranger District. All other cross country travel would be prohibited.
- Prohibit public motorized use on approximately 15 miles of roads and 19 miles of trail currently open in order to minimize or reduce resource damage.

There are specific project activities for the Districts as stated below.

Powers Ranger District

- Off-road motorized travel for dispersed camping is generally allowed along all roads designated open, except where otherwise prohibited. No off-road motorized travel for dispersed camping would be allowed within ¼ mile of developed recreation sites.
- Designate approximately 6.2 miles of paved road for motorized mixed use on a portion of Road 3348 (Eden Valley Road).

Gold Beach Ranger District

- Off-road motorized travel for dispersed camping is generally allowed along all roads designated open, except where otherwise prohibited. No off-road motorized travel for dispersed camping would be allowed within ¼ mile of developed recreation sites.
- Amend the Siskiyou LRMP to make current motorized use of the Game Lake Trail (#1169), Lawson Creek Trail (#1173), Illinois River Trail (#1161), Silver Peak Hobson Horn Trail (#1166), and an unnamed connector trail consistent with the Standards and Guidelines for the Allocations through which they pass (Backcountry Recreation).
- Prohibit motorized mixed use on approximately 12.6 miles of road where it is currently authorized on portions of Roads 1376010, 1376012, 1376013, 1376015, 1376019, 1376902, 1376903, and 1376908.
- Prohibit motorized use on approximately 10.1 miles in the lower portions of the Lawson Creek (#1173) and Game Lake (#1169) trails, which currently allow motorized use.
- Construct approximately 0.5 miles of new motorized trail that would connect to the Woodruff Trail.

- Designate approximately 0.2 miles of paved road for motorized mixed use on a portion of Road 3313.
- Convert approximately 8.1 miles of roads currently designated as Maintenance Level 1 to motorized trails (portions of Roads 3313103, 3313110, 3313117, 3680190, 3680195, 3680220, 3680351, 3680353, and 3680409).

Wild Rivers Ranger District

- Amend the Siskiyou LRMP to make motorized use of the Boundary Trail (#1207) consistent with Standards and Guidelines for the allocations in which it passes through (Research Natural Area).
- Convert approximately 3.0 miles of roads currently designated as Maintenance Level 1 to motorized trails (portions of Roads 4402494, and 2509640).
- Prohibit motorized mixed use on approximately 11.8 miles of road where it is currently authorized on portions of Roads 4201029, 4201881, 4300011, 4300910, and 4300920.
- Prohibit public motorized use on approximately 13.8 miles of road, including portions of Roads 4400445, 4400459, 4400460, 4400480, 4300011, 4300910, 4300920, 4300925, 4201016, and 4103011.
- Prohibit motorized use on approximately 0.6 miles of Road 2600050.
- Prohibit motorized use on approximately 11.3 miles of trail that currently allows motorized use on portions (or entirely) of the following trails: Taylor Creek (#1142), Big Pine Spur (1142A), Onion Way (#1181), Secret Way (#1182), Secret Way Spur (1182A), and Swede Creek (#1135).
- Prohibit motorized use on approximately 1.8 miles of trail that currently allows motorized use on the Silver Lake Trail (#1184).
- Prohibit motorized use on approximately 4.1 miles of trail that currently allows motorized use on portions (or entirely) of the following trails: Mt. Elijah(#1206), Bigelow Lake (#1214), Bolan Lake (#1245), and Kings Saddle (#1245A).

Siskiyou Mountains Ranger District

- Off-road motorized travel for dispersed camping is generally allowed up to 300 feet along roads designated as open, except for areas currently closed by a Forest Order.
- An amendment to the Rogue River Land and Resource Management Plan to make motorized use of the Boundary Trail (#1207) and some connecting trails (#900 and #903) consistent with Standards and Guidelines for the allocations through which it passes.
- Prohibit motorized use on approximately 4.0 miles of the Horse Camp Trail (#958) that currently allows motorized use.
- Construct and relocate approximately 1.2 miles of the Penn Sled Trail (#957) east of Applegate Lake that would allow motorized use for Class III vehicles.

High Cascades Ranger District

- Off-road motorized travel for dispersed camping is generally allowed up to 300 feet along most roads designated as open, except within the Elk Creek Watershed, and areas currently closed by Forest Order.
- Develop a motorized play area (approximately 10 acres) near the junction of road 3050 and county road 821.
- Designate approximately 31.5 miles of paved road for motorized mixed use on portions of Roads 34, 37, 3705, 3720, and within developed campgrounds adjacent to routes that allow mixed use. These campgrounds included Union Creek, Farewell Bend, Natural Bridge, Woodruff Bridge, Abbott Creek, and Whiskey Springs.

Alternative 4

Alternative 4 addresses the significant resource issues identified through the scoping process and propose a reduction in motorized use relative to the current condition and to Alternative 3.

Under Alternative 4, amendments to the Rogue River and Siskiyou Land and Resource Management Plans would provide consistency with the 2005 Travel Management Rule. All roads and trails and areas would be closed to motorized use unless designated as open.

Based on the stated Purpose and Need for action and as a result of the recent analysis of the transportation system, Alternative 4 proposes to:

Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use

- Similar to Alternatives 2 and 3.

Close Areas to Cross-Country Motorized Travel

- Similar to Alternatives 2 and 3.

C*onvert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, Prohibit Motorized Public Use, and Construct Motorized Trail*

- Similar to all the Action Alternatives, formally designate approximately 3,092 miles of road where mixed use would be allowed. Mixed use is defined as designation of a National Forest System (NFS) road for use by both highway-legal and non-highway-legal motor vehicles.
- Prohibit motorized public access on approximately 28 miles of roads currently open in order to minimize or reduce resource damage.
- Prohibit motorized use on approximately 106 miles of trails currently open in order to minimize or reduce resource damage and user conflicts.

There are specific project activities for each of the Districts as stated below.

Powers Ranger District

- Off-road travel for dispersed motorized camping would not be allowed along paved roads. All other open roads would allow off-road motorized travel for dispersed camping. No off-road motorized travel would be allowed within ¼ mile of developed recreation sites or where otherwise prohibited.
- Prohibit motorized use on the one-mile Big Tree Trail (#1150)

Gold Beach Ranger District

- Off-road travel for dispersed motorized camping would not be allowed along paved roads. All other open roads would allow off-road motorized travel for dispersed camping. No off-road motorized travel would be allowed within ¼ mile of developed recreation sites or where otherwise prohibited.
- Prohibit motorized mixed use on approximately 12.6 miles of road where it is currently authorized on portions of Roads 1376010, 1376012, 1376013, 1376015, 1376019, 1376902, 1376903, and 1376908.

- Prohibit motorized use on approximately 6.0 miles of road where it is currently authorized on portions of Roads 1107350, 1107357, 1107950, 1205245, 1205246, 1205248, 1205249, and 1205321.
- Prohibit motorized use on approximately 33.2 miles of trail that include 16.9 miles on the Game Lake (#1169) and Lawson Creek (#1173) trail system, 9.7 miles on the lower portion of the Illinois River Trail (#1161) and 5.4 miles on the Lower Rogue River Trail (#1168).
- Prohibit motorized use on the 17.2 mile Silver Peak-Hobson Horn (#1166) located on both the Gold Beach and Wild Rivers Ranger Districts, and the 3-mile Fish Hook Trail (#1180), also located on both Districts.

Wild Rivers Ranger District

- No off-road motorized travel for dispersed camping would be allowed. The only authorized parking would along-side of open roads (not to exceed 20 feet) or in previously constructed landings.
- Prohibit motorized use on approximately 1.8 miles of trail that currently allows motorized use on the Silver Lake Trail (#1184).
- Prohibit motorized mixed use on approximately 4.8 miles of Road 2512091.
- Prohibit motorized use on approximately 0.6 miles of Road 2600050.
- Prohibit motorized use on approximately 11.3 miles of trail that currently allow motorized use, including portions of Taylor Creek (#1142), Big Pine Spur (#1142A), Onion Way (#1181), Secret Way (#1182), Secret Way spur (#1182A), Briggs Creek (#1132), Red Dog (#1143), Phone (#1153), Dutchy Creek (#1146) and Swede Creek (#1135) Trails.
- Prohibit motorized use on approximately 3.9 miles of road including portions of Roads 4300011, 4300910, 4300925, 4201016, and 4103011. In Addition, prohibit motorized use on approximately 4.4 miles of road, including portions of Roads 4103087, 4201844, 4201846, 4201847, 2524847, 2524015, and 2524048. These roads would still be open for permitted or limited administrative use.
- Prohibit motorized mixed use on approximately 10.8 miles of road where it is currently authorized on portions of Roads 4201029, 4201881, 4300011, 4300910, and 4300920.
- Prohibit motorized use on approximately 7.6 miles of road including all or portions of Roads 4400445, 4400459, 4400460, and 4400480.
- Prohibit motorized use on approximately 24.8 miles of road including all or portions of Roads 4402019, 4402172, 4402206, 4402259, 4402450, 4402530, and 4402550.
- Prohibit motorized use on approximately 15.2 miles of trail that currently allows motorized use on the following trails: Boundary Trail (#1207), Elk Creek (#1230), Mt. Elijah (#1206), Bigelow Lake (#1214), Bolan Lake (#1245) and Kings Saddle.

Siskiyou Mountains Ranger District

- Off-road motorized travel for dispersed camping would only be allowed along certain designated Maintenance Level 2 and 3 roads.
- Prohibit motorized use on approximately 3.8 miles of trail that includes the Sturgis Fork (#903) and O'Brien Creek (#900) trails.
- Prohibit motorized use on approximately 29.1 miles of trail that includes the Horse Camp Trail (#958), Cook and Green Trail (#959) and the Mule Mountain complex of trails: Mule Mountain (#919), Mule Creek (#920), Charley Buck/Baldy Peak (#918), and Little Grayback (#921).

High Cascades Ranger District

- There would be no changes on the High Cascades Ranger District. The Prospect OHV system would remain in place. Off-road motorized travel for dispersed camping would be allowed along currently identified "green-dot" roads only.

Alternative 5 – Preferred Alternative

Alternative 5 is a blend of activities included in Alternatives 3 and 4, which would provide for a designated and managed system, enact changes to reduce existing resource damage from motorized use, and reduce social impacts such as user conflicts and safety concerns. Alternative 5 would propose a reduction in motorized use relative to the current condition and Alternative 3, though not to the extent of Alternative 4.

Based on the stated Purpose and Need for action and as a result of the recent analysis of the transportation system process, under Alternative 5, the Forest proposes to:

Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use

- Similar to Alternatives 2 through 4.

Close Areas to Cross-Country Motorized Travel

- Similar to Alternatives 2 through 4.

C*onvert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, Prohibit Motorized Public Use, and Construct Motorized Trail*

- Similar to all the Action Alternatives, formally designate approximately 3,129 miles of road where mixed use would be allowed. Mixed use is defined as designation of a National Forest System (NFS) road for use by both highway-legal and non-highway-legal motor vehicles.
- Construct one motorized trail to provide loop route opportunities (approximately 1.2 miles).
- Convert approximately 10 miles of NFS roads to motorized trails.
- Designate one area where off-road motorized use would be allowed. This would include continued use of the Woodruff area near Prospect. This area is located on the High Cascades Ranger District.
- Prohibit public motorized use on approximately 23 miles of roads and 29 miles of trail currently open in order to minimize or reduce resource damage.

There are specific project activities for most of the Districts as stated below.

Powers Ranger District

- Prohibit motorized use on the one-mile Big Tree Trail (#1150).

Gold Beach Ranger District

- Amend the Siskiyou LRMP to make current motorized use of the Game Lake Trail (#1169), Lawson Creek Trail (#1173), Illinois River Trail (#1161), Silver Peak Hobson Horn Trail (#1166), and an unnamed connector trail consistent with the Standards and Guidelines for the Allocations through which they pass (Backcountry Recreation).
- Prohibit motorized mixed use on approximately 12.5 miles of road where it is currently authorized on portions of Roads 1376010, 1376012, 1376013, 13760150, 1376019, 1376902, 1376903, and 1376908.

- Prohibit motorized use on approximately 14.2 miles of trail that include 6.9 miles on the Game Lake Trail (# 1169), 4.1 miles on the Lawson Creek Trail (#1173), and 3.2 miles on a portion of the Illinois River Trail (#1161).
- Convert approximately 9.3 miles of roads currently designated as Maintenance Level 1 to motorized trails (portions of Roads 3313103, 3680190, 3680195, 3680220, 3680351, 3680353, and 3313117). These roads are located in the following areas south of the Rogue River: Upper Lawson Creek, Signal Butte, and Kimball Butte.
- Prohibit motorized use on approximately 0.8 miles of trail (#1164) in the Woodruff Meadow area.
- Designate approximately 500 feet of paved road for motorized mixed use on a portion of Road 2308 (Burnt Ridge Road).

Wild Rivers Ranger District

- Route-specific Forest Plan Amendments: An amendment to the Siskiyou Land and Resource Management Plan is proposed to make motorized use of the Boundary Trail (#1207) consistent with Standards and Guidelines for the allocations through which it passes (Research Natural Area).
- Prohibit motorized mixed use on approximately 10.2 miles of road where it is currently authorized on portions of Roads 4400445, 4400459, 4400460, 4400461, and 4400480.
- Prohibit motorized mixed use on approximately 11.9 miles of road where it is currently authorized on portions of Roads 4201029, 4201881, 4300011, 4300910 and 4300920.
- Prohibit public motorized use on approximately 6.4 miles of road including portions of Roads 4300011, 4300910, 4300920, 4300925, 4201016, and 4103011. These roads would still be open for permitted or limited administrative use.
- Convert approximately 0.3 miles of Road 2509640, currently designated as a Maintenance Level 1 road, to a motorized trail.
- Prohibit motorized use on approximately 0.6 miles of Road 2600050.
- Prohibit motorized use on approximately 11.1 miles of trail that currently allows motorized use on portions (or entirely) of the following trails: Taylor Creek (#1142), Big Pine Spur (1142A), Onion Way (#1181), Secret Way (#1182), Secret Way Spur (1182A), and Swede Creek (#1135).
- Prohibit motorized use on approximately 1.9 miles of trail that currently allows motorized use on the Silver Lake Trail (#1184).
- Prohibit motorized use on approximately 4.1 miles of trail that currently allows motorized use on portions (or entirely) of the following trails: Mt. Elijah(#1206), Bigelow Lake (#1214), Bolan Lake (#1245), and Kings Saddle (#1245A).

Siskiyou Mountains Ranger District

- An amendment to the Rogue River Land and Resource Management Plan to make motorized use of the Boundary Trail (#1207) and some connecting trails (#900 and #903) consistent with Standards and Guidelines for the allocations through which it passes.
- Prohibit motorized use on approximately 3.8 miles of the Horse Camp Trail (#958) that currently allows motorized use.
- Construct and relocate approximately 1.2 miles of the Penn Sled Trail (#957) east of Applegate Lake that would allow motorized use for Class III vehicles.

IV. DESCRIPTION OF AFFECTED SPECIES AND HABITAT

Status of Listed Species and Habitat

Oregon Coast Coho Salmon and Critical Habitat (Threatened)

Oregon Coast (OC) Coho ESU was listed as threatened on August 10, 1998 (63 FR 42587). This listing was reevaluated and NMFS determined listing OC Coho was not warranted on January 17, 2006. The listing was once again reevaluated and NMFS determined a listing of threatened was warranted on February 4, 2008 (73 FR 7816). OC Coho Salmon critical habitat was designated as threatened also on February 11, 2008 (73 FR 7816). Final protective regulations for OC Coho Salmon were issued on February 11, 2008 (73 FR 7816). On April 28, 2009 NMFS announced that it was initiating a status review of OC Coho. On May 26, 2010, NMFS affirmed the listing of the OC Coho Salmon as Threatened (75 FR 29489).

Critical habitat is defined in Section 3(5)(A) of the ESA as "the specific areas within the geographical area occupied by the species Oregon Coast Coho on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection." Section 7 of the ESA prohibits the destruction or adverse modification of designated critical habitat (CCH). Table G-5 lists streams with OC Coho presence and/or CCH within the Action Area. The Action Area for this project is all land within the boundaries of the Rogue River-Siskiyou National Forest. This area encompasses nearly 2 million acres, most of which is administered by the RRSNF.

The lateral extent of OC CCH is limited to the ordinary high water mark (i.e. bankfull elevation). On the RRSNF, the South Fork Coquille River, though occupied by OC Coho, is exempt from critical habitat designation due to economic benefits of exclusion outweighing the benefits of designation. Further, marine habitats are not included as critical habitat due to the difficulty in identifying specific areas critical to the species. The habitat indicators addressed in this BE that are pertinent to aquatic habitat health, also represent the primary constituent elements of proposed CH for OC Coho Salmon. Table G-5 lists watersheds with OC Coho presence, CCH and/or EFH within the Action Area.

Table G-5. Oregon Coast Coho Salmon ESU Critical Habitat within Action Area

5th Field Watershed	5th Field Watershed (acres)	CCH on NFSL (miles)
Sixes River	85,832	14.4
South Fork Coquille River	108,300	0
West Fork Cow Creek	55,892	0

NMFS developed a list of Primary Constituent Elements (PCEs) that are essential for the conservation of OC Coho, and which are based on the life history of the Coho Salmon. These PCEs are: freshwater spawning sites, freshwater rearing sites, freshwater migration corridors, estuarine areas, nearshore marine areas, and offshore marine areas. These PCEs in concert with OC Coho distribution data, were used to delineate the spatial extent of the critical habitat. The lateral extent of this designation is limited to the ordinary high water mark (i.e. bankfull elevation). For the purposes of this BA, the PCEs are cross referenced with the respective Habitat Indicators in Table G-6 below.

Table G-6. OC Coho Critical Habitat Essential Habitat Features and Respective Habitat Indicators

PCEs of OC Coho Critical Habitat	Habitat Indicator
Freshwater Spawning Sites	Change in Peak/Base Flows, Water Temperature, Sediment/Turbidity, Chemical Contamination/Nutrients, Substrate
Freshwater Rearing Sites	Change in Peak/Base Flows, Floodplain Connectivity, Water Temperature, Sediment/Turbidity, Chemical Contamination/Nutrients, Water Quality Indicators, Riparian Reserves, Substrate, Large Woody Debris, Pool Frequency, Pool Quality, Width/depth Ratio, Off-channel Habitat, Streambank Condition
Freshwater Migration Corridors	Physical Barriers, Change in Peak/Base Flows, Water Temperature, Sediment/Turbidity, Chemical Contamination/Nutrients, Riparian Reserves, Substrate, Large Woody Debris, Pool Frequency, Pool Quality, Width/depth Ratio, Floodplain Connectivity, Off-channel Habitat, Streambank Condition
Estuarine Areas	Physical Barriers, Water Temperature, Sediment/Turbidity, Chemical Contamination/Nutrients, Change in Peak/Base Flows, Water Quality Indicators, Riparian Reserves, Substrate, Large Woody Debris, Pool Frequency, Pool Quality, Width/depth Ratio, Floodplain Connectivity, Off-channel Habitat, Streambank Condition
Nearshore Marine Areas	N/A to RRSNF Actions
Offshore Marine Areas	N/A to RRSNF Actions

SONCC Coho Salmon and Critical Habitat (Threatened)

CCH for SONCC Coho Salmon was designated by NMFS on May 5, 1999 (64 FR 24049). CCH is defined in Section 3(5)(A) of the ESA as "the specific areas within the geographical area occupied by the species ... on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection." Critical habitat was designated (64 FR 24049, May 5, 1999) to include all river reaches accessible to listed Coho Salmon between Cape Blanco, Oregon, and Punta Gorda, California. Critical habitat consists of the water, substrate, and adjacent riparian zones of estuarine and riverine reaches (including off-channel habitats). Accessible reaches are those within the historical range of the ESU that can still be occupied by any life stage of Coho Salmon. Inaccessible reaches are those above specific dams or above long-standing, naturally impassable barriers (i.e., natural waterfalls in existence for at least several hundred years). Table G-7 lists watersheds with SONCC Coho presence, CCH and/or EFH within the Action Area.

Table G-7. SONCC Coho Critical Habitat within Action Area

5th Field Watershed	5th Field Watershed (acres)	CCH on NFSL (miles)
Althouse Creek	30,243	3.7
Bear Creek	231,244	13.5
Big Butte Creek	158,256	0
Briggs Creek	43,758	0.7
Chetco River	225,228	113.5
Deer Creek	72,605	2.6
East Fork Illinois River	57,779	13.1
Elk Creek	85,476	9.6
Elk River	58,398	38.6
Euchre Creek-Frontal Pacific	56,329	0
Headwaters Applegate Riv.	142,276	0
Headwaters Rogue River	248,577	0
Hellgate Canyon-Rogue River	93,369	16.2
Hunter Creek	28,458	0
Indian Creek	82,267	0
Indigo Creek	48,984	30.3

5th Field Watershed	5th Field Watershed (acres)	CCH on NFSL (miles)
Josephine Creek-Illinois River	81,746	38.9
Klondike Creek-Illinois River	67,123	42.7
Lawson Creek-Illinois River	41,179	20.2
Little Applegate River	72,295	0
Little Butte Creek	238,882	18.8
Lobster Creek	44,316	19.2
Lower Applegate River	90,604	10.5
Middle Applegate River	82,603	0
North Fork Smith River	101,182	36.9
Pistol River	67,285	21.7
Rogue River	82,717	25.9
Shasta Costa Creek-Rogue River	45,026	22.1
Silver Creek	51,620	22.1
South Fork Rogue River	160,773	0
Stair Creek-Rogue River	36,544	13.4
Sucker Creek	61,515	12.8
Upper Applegate River	52,296	14.9
West Fork Illinois River	76,996	30.1
Winchuck River	45,634	39.5

The list of Primary Constituent Elements (PCEs) essential for the conservation of the SONCC Coho ESU include, but are not limited to, spawning sites, food resources, water quality and quantity, and riparian vegetation (64 FR 24050, May 5, 1999). Specifically, the adjacent riparian area is defined as the area adjacent to a stream that provides the following functions: shade, sediment, nutrient or chemical regulation, streambank stability, and input of large woody debris or organic matter. NOAA Fisheries defines 10 essential habitat features to include substrates, water quality, water quantity, water temperature, water velocity, cover/shelter, food, riparian vegetation, space, and safe passage conditions (64 FR 24059, May 5, 1999). For the purposes of this BA, the 10 essential habitat features are cross referenced with the respective Habitat Indicators in Table G-8 below.

Table G-8. Essential Habitat Features and Respective Habitat Indicators of SONCC CCH

Essential Feature of CCH	Habitat Indicator
Substrate	Sediment, Pool Quality, Landslide Rates, Large Woody Debris
Water Quality	Temperature, Sediment, Road Density & Location
Water Quantity	Peak/base flows, Drainage Network Increase, Road Density and Location
Water Temperature	Temperature, Riparian Reserves, Refugia, Width/Depth Ratio, Streambank Condition, Peak/base flows, and Floodplain Connectivity.
Water Velocity	Peak/base flows, Drainage Network Increase, Floodplain Connectivity, Off-channel Habitat, Width/Depth Ratio, Road Density and Location, Streambank Condition, Large Woody Debris
Cover/shelter	Sediment, Pool Quality, Streambank Condition, Riparian Reserves, Refugia, Large Woody Debris, Off-channel Habitat, Width/Depth Ratio, Floodplain Connectivity
Food	Sediment, Riparian Reserves, Floodplain Connectivity, Large Woody Debris, Temperature
Riparian Vegetation	Riparian Reserves, Large Woody Debris, Disturbance History, Floodplain Connectivity
Space	Pool Quality, Off-channel Habitat, Floodplain Connectivity
Safe Passage Conditions	Refugia, Physical Barriers, Change in Peak/Base Flows

Coho and Chinook Salmon Essential Fish Habitat

Interim final rules for Essential Fish Habitat (EFH) under the Magnuson-Stevens Act (16 U.S.C. 1855(b)) were published in the Federal Register/ Vol. 62, No. 244, December 19, 1997 and final rules published in the Federal Register/ Vol. 67, No. 12, January 17, 2002. These rules are pertinent to Chinook Salmon and Coho Salmon habitat within the Southern Oregon Coastal Basin. Essential Fish Habitat (EFH) has been defined by NMFS as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity." This definition includes all waters historically used by anadromous salmonids of commercial value. EFH within the Action Area is the same as CCH, except on NFSL within the South Fork Coquille Watershed where OC Coho Salmon reside . Table G-5 and G-7 displays watersheds with EFH within the Action Area by river miles.

SONCC Chinook Salmon (Sensitive)

On the RRSNF, Southern Oregon and Northern California Coastal (SONCC) Chinook Salmon occur within the Rogue, Pistol, Chetco, Winchuck, and Smith River basins, as well as several smaller coastal front drainages (e.g. Hunter Creek). The SONCC Evolutionarily Significant Unit (ESU) was determined to be not warranted for listing under the Endangered Species Act, by the National Marine Fisheries Service on September 16, 1999 (64 FR 50394). This ESU is listed as a Sensitive Species on the USFS Region 6 Special Status Species List.

OC Steelhead (Sensitive)

On the RRSNF, Oregon Coast (OC) steelhead occurs within the South Fork Coquille, and Sixes River drainages. The OC steelhead trout distinct population segment (DPS) was proposed as threatened under the ESA on August 9, 1996 (61 FR 41541), but was found not warranted for listing. OC steelhead is currently listed as a species of concern by NMFS, and as a Sensitive Species by the USFS Region 6.

Southern North American Green Sturgeon (Threatened)

On April 7, 2006, NMFS published a final rule listing the Southern DPS Green Sturgeon as Threatened under the ESA (71 FR 17757). Further, critical habitat for the southern DPS was designated in October 2009 (74 FR 52300). Southern DPS North American Green Sturgeon do not occur or have suitable habitat within proximity to any of the proposed changes included within any of the Action Alternatives. Distribution of this species is limited to the Rogue River estuary, approximately 6 miles downstream of the Forest Boundary at its closest point. As such, a **No Effect** determination is rendered and this species will not be discussed further within this document.

Southern Pacific Eulachon (Threatened)

On March 18, 2010, NMFS published a final rule listing the Southern DPS Pacific Eulachon as Threatened under the ESA (75 FR 13012). Further, critical habitat for the Southern DPS was designated in October 2011 (76 FR 65324). Southern DPS Pacific Eulachon do not occur or have suitable habitat within proximity to any of the proposed changes include within any of the Action Alternatives. Eulachon are rare within estuaries along southern Oregon coast, including the Rogue River estuary (Monaco et al. 1990). Distribution of this species is limited to estuaries (i.e. Chetco River, Hunter Creek, Rogue River, Euchre Creek, etc.) and immediately adjacent freshwater areas along the southern Oregon coast. These occupied habitats are located more than 5 miles downstream of the Forest boundary. Thus, a **No Effect** determination is rendered and this species will not be discussed further within this document.

Other Species

PC Chum Salmon, western ridged mussel, highcap lanx, scale lanx, robust walker, pacific walker, Haddock's rhyacophilan caddisfly, *Namamyia plutonis* are not know to occur or have suitable habitat within proximity (see list below) to any of the proposed changes included within any of the Action Alternatives. As such, a **No Impact** determination is rendered and these species will not be discussed further within this document.

- PC Chum Salmon – None of the watersheds on the Forest contain Chum Salmon. Any Chum Salmon observed within the Rogue Basin or Oregon south coast face drainages are strays.
- Western ridged mussel – one known record from the Rogue River mainstem in Curry County. Threats to the species include loss of host fish, channel modification, thermal pollution, and sedimentation. Project actions under all alternatives, would not affect any of these conditions within the mainstem Rogue River.
- Highcap lanx – Documented in the Rogue River mainstem. Threats to the species include impoundment of water and waste water drainage. Project actions under all alternatives, would not affect these conditions within the mainstem Rogue River.
- Scale lanx – Occurs in the Upper Klamath Lake area. Project actions under all alternatives would not alter aquatic habitat conditions within the Upper Klamath Lake basin.
- Robust walker – Species has been documented in the Winchuck, Chetco, and Josephine Creek watersheds. Species distribution is limited to perennial seeps and rivulets that are protected from seasonal flushing. The primary threat to the species is loss of habitat. Project actions under all alternatives would not affect potential wetland habitat for this species.
- Pacific walker - This is a coastal endemic species (coastal fog belt, among wet leaf litter and vegetation adjacent to perennial water). Documented sites for this species in Oregon are limited to one site in the Lower Millicoma River sub-basin (Coos County) and one in the Alsea River sub-basin (Lane County). Project actions under all alternatives would not affect any known location or potential habitat for this species.
- Haddock's Rhyacophilan Caddisfly – Free-living caddisfly generally associated with small, cool or cold montane streams. Known within the action area from one locality, a large wet seep in the Elk River watershed, Powers Ranger District.
- A Caddisfly (*Namamyia plutonis*) - A case-dwelling caddisfly, known to occur in the Coastal and Cascade Ranges of Oregon and California. There are four known localities on the Rogue River-Siskiyou National Forest (Winchuck River watershed, WF Illinois River watershed, Sucker Creek watershed, Bear Creek watershed).

V. DESCRIPTION OF ENVIRONMENTAL BASELINE AND POTENTIAL EFFECTS OF THE PROPOSED ALTERNATIVES

A. Environmental Baseline – Forest-wide

The Forest is located in several geologic provinces in SW Oregon: Klamath Mountains, Coastal Franciscan and Cascade Mountains (Western and High Cascades). Anadromous and resident fish populations have occupied the Forest lands for many thousands of years during periods of variable climate and periodic floods, large and smaller area fires, wind storms and tectonic movements that caused aquatic and riparian habitat changes. These fish inhabit diverse habitats on the Forest in streams, ponds, lakes, and reservoirs at elevations from near sea level to more than 5,000 feet elevation. Anadromous fish occupy over 700 miles of streams and rivers on the Forest; including two races of Chinook Salmon, Coho Salmon, two races of steelhead and sea-run cutthroat trout. Coho Salmon and its critical habitat on the Forest are listed as threatened under the Endangered Species Act for the Southern Oregon/Northern California Coasts (SONCC) and Oregon Coast (OC) Coho Salmon Evolutionary Significant Units (ESU).

Coho Salmon and Chinook habitat on this Forest are listed as threatened for Essential Fish Habitat (EFH) under the Magnuson-Stevens Act (16 U.S.C. 1855(b)). Rules were published in the Federal Register/ Vol. 62, No. 244, December 19, 1997 and final rules published in the Federal Register/ Vol. 67, No. 12, January 17, 2002. These rules are pertinent to Chinook salmon and coho salmon habitat within the Southern Oregon Coastal Basin. Resident trout and other species occupy approximately 2,000 miles of streams on the Forest. The preponderance of anadromous fish habitat is found in the western portion of the Forest (Siskiyou Mountains and Coast Range) due to natural and human-made migration barriers in portions of the eastside of the Forest, e.g., Lost Creek Dam and Applegate Dam.

The Forest contains portions of six designated Wild and Scenic Rivers, including the: upper Rogue, lower Rogue, Chetco, Illinois, Elk, and North Fork Smith Rivers; five of which have fisheries Outstanding and Remarkable Values; excluding upper Rogue located above Lost Creek Lake reservoir, an anadromous fish barrier. Lake habitats are also abundant on the Forest, particularly at Fish Lake, Applegate Lake, and within the Sky Lakes and Red Buttes Wilderness Areas, where many high elevation lakes are stocked with trout.

Native fish, particularly salmonids, on the Forest require cool clean water, gravels with little fine sediment for spawning, shade along streams from vegetation and diverse habitats for successful growth during periods of their life history in fresh water. Large wood plays several important roles in fish habitat: for shade along streams, large mass to create habitat when wood enters the water, and in the formation and maintenance of stream channels. Large wood also has an ecological role associated with slope stability, soil retention, stream channel scouring, organic matter for primary aquatic production and formation of large stream features (fans, wood complexes and blockages, large sediment deposits) during storm episodes. Fish habitat on the Forest is generally lacking in diversity and complexity where past management activities, e.g., wood removal and road building have simplified instream diversity. Here fish habitat is lacking the quality and quantity of pool habitat and spawning gravels expected within the range of historical conditions. Some areas, particularly in the Siskiyou Mountains, naturally lack the expected numbers of large wood pieces per mile due to channel steepness and intensity of storms. Historically in SW Oregon, fire, floods and landslides have routinely changed in-stream habitats, with large changes occurring during episodic events.

Comparing past stochastic episodes with management of the Forest the past several decades indicates a change of disturbance patterns from irregular and episodic to more chronic patterns of anthropogenic disturbance from timber harvest, mining, road construction and maintenance, livestock grazing, and suppression of fire. Timber harvest and associated road development and road traffic have greatly decreased since the mid to late 1980's. Tree-growth and healing of eroded areas has passively recovered and placed stream networks in most watersheds on a recovery trajectory within the National Forest. Roads continue to have a chronic sediment and drainage effect on fish populations and water quality in many watersheds and mining instream is a chronic disturbance in many streams on the west side of the Forest. High recreation use in specific local riparian areas also creates some chronic disturbance. Watershed restoration has occurred intensively on the Forest since the Northwest Forest Plan, 1994. Stream, riparian, and upland restoration is a process being implemented on high priority watersheds on the Forest.

At the landscape scale, it is well documented that motorized routes modify the frequency, timing, and magnitude of disturbance to aquatic systems. The current motorized travel system on the Forest includes over 5,200 miles of motorized routes. Many of these routes are located within proximity to occupied fish habitat. The overriding negative effect of this motorized travel system on the fisheries resource is via sediment input to stream systems, Riparian Reserve fragmentation, and to a lesser degree fragmentation of aquatic habitats due to impassable or partially impassable road/stream crossings. These conditions have contributed to decreased distribution and abundance of native salmonid stocks, particularly anadromous salmon and steelhead.

B. Potential Effects of the Proposed Alternatives

The NMFS "matrix of pathways and indicators" (NMFS 1996), was used to help determine the effects of the Action Alternatives (Alternatives 2, 3, 4, and 5). This process was intended to be utilized when considering project level effects at the watershed scale. All Action Alternatives would result in a overall **neutral** effect to the following indicators: *temperature, sediment, chemical contamination/nutrients, physical barriers, substrate, large woody debris, pool frequency/quality, off-channel habitat, refugia, width/depth ratio, stream bank condition, floodplain connectivity, change in peak/base flows, increase in drainage network, road density, disturbance history, and Riparian Reserves*. This is due to the project activities occurring at sites that are currently part of the RRSNF travel route network, and in general they merely involve an administrative change in the type of use (e.g. mixed-use, non-motorized, etc.) that an existing route would receive. There is no ground disturbing action from these actions. Road maintenance currently occurs and will continue. Any ground disturbing activity that may occur in the upcoming years (e.g. culvert replacement), would be covered under a different effects analysis and consultation process.

The only exception to a neutral effect with the above indicators involves the on-the-ground construction of the Penn Sled Trail (included in Alternatives 3 and 5) on the Siskiyou Mountains Ranger District, and the Woodruff Trail Connector (Alternative 3) on the Gold Beach Ranger District, and the elimination of motorized use of the Mule Creek Trail (#920) (Alternative 4) on the Siskiyou Mountains Ranger District. Effects to S*ediment* and *Pool Frequency/Quality* for these three actions are disclosed within the respective alternative effects section within this document.

Table G-9. TMP Actions – Alternatives 1, 2, 3, 4, and 5 – Relative to Riparian Reserves and Coho Salmon Critical Habitat

Activity	Watershed	ESU	Total Units (miles/ acres)	Units w/in Riparian Reserve	Units outside RR	Location in Watershed (lower, middle, upper)	Distance from Anadromous. Habitat	Effect Deter.	Alternative	Comments
No action	Multiple Watersheds across the Forest	All	N/A	N/A	N/A	N/A	N/A	NE	1	
Close Areas to Motorized Cross-Country Travel	Multiple Watersheds across the Forest	SONCC, OC	275,000 acres	-	-	-	-	NE	2, 3, 4, 5	
Convert mtn. Level 1 to motorized trail	Rogue River	SONCC	3.77	0.75	3.02	Upper/mid	1.60	NE	3	Non-Fish Bearing Rip. Res.
			2.90	0.20	2.70	Upper/mid	2.40	NE	5	
Convert mtn. Level 1 to motorized trail	Lawson Creek-Illinois River	SONCC	3.69	0	3.69	Upper	5.10	NE	3, 5	Ridgetop Road
Convert mtn. Level 1 to motorized trail	Hellgate Canyon – Rogue River	SONCC	0.29	0	0.29	Upper	1.20	NE	3, 5	Ridgetop Road
Convert mtn. Level 1 to motorized trail	Klondike Creek-Illinois River	SONCC	0.76	0	0.76	Upper	1.25	NE	3	Ridgetop Road
Convert mtn. Level 1 to motorized trail	NF Smith River	SONCC	2.72	0	2.72	Upper	0.70	NE	3	Ridgetop Road
Prohibit motorized use on an existing trail	Rogue River	SONCC	0.78	0	0.78	Middle	0.50	NE	5	
Prohibit motorized use on an existing trail	Lawson Creek – Illinois River	SONCC	10.65	1.23	9.42	Mid/Low	0	NE	3	Crosses anadromous habitat twice
			28.02	4.76	23.26	Mid/Low	0	NE	4	
			14.27	2.59	11.68	Mid/Low	0	NE	5	
Prohibit motorized use on an existing trail	Pistol River	SONCC	0.13	0	0.13	Upper	2.80	NE	4	Ridgetop Trails
Prohibit motorized use on an existing trail	Chetco River	SONCC	0.20	0	0.20	Upper	1.95	NE	4	Ridgetop Trail
Prohibit motorized use on an existing trail	Indigo Creek	SONCC	13.80	1.20	12.60	Up/Mid/Low	0	NE	4	Crosses anadromous habitat once
Prohibit motorized use on an existing trail	Briggs Creek	SONCC	11.11	0.89	10.22	Upper/mid	6.70	NE	3, 5	
			27.08	11.49	15.59	Up/Mid/Low	3.85	NE	4	
Prohibit motorized use on an existing trail	Silver Creek	SONCC	1.85	0.71	1.14	Middle	12.50	NE	3, 5	
			11.14	1.78	9.36	Mid/Low	2.75	NE	4	
Prohibit motorized use on an existing trail	Sucker Creek	SONCC	2.98	0.32	2.66	Upper	3.00	NE	3, 5	
			6.49	1.01	5.48	Upper	3.00	NE	4	

Activity	Watershed	ESU	Total Units (miles/ acres)	Units w/in Riparian Reserve	Units outside RR	Location in Watershed (lower, middle, upper)	Distance from Anadromous. Habitat	Effect Deter.	Alternative	Comments
Prohibit motorized use on an existing trail	Indian Creek	SONCC	1.08	0	1.08	Upper	1+ miles	NE	3, 4, 5	Ridgetop trail
Prohibit motorized use on an existing trail	S Fork Coquille	OC	0.91	0.21	0.70	Middle	0.05*	NE	4	Ridgetop trail
Prohibit motorized use on an existing trail	Upper Applegate R	SONCC	13.04	5.10	7.94	Middle	0	NLAA-B	4	
Prohibit motorized use on an existing trail	Headwaters Applegate River	SONCC	3.84	1.22	2.62	Upper	8.20	NE	3, 5	Upstream of Applegate Dam
		SONCC	25.60	7.36	18.24	Upper	3.20	NE	4	
Prohibit motorized mixed use	S. Fork Coquille	OC	0.17	0	0.17	Middle	0.40	NE	4	Ridgetop road
Prohibit motorized mixed use	Chetco River	SONCC	12.51	0.52	11.99	Middle	0.05	NE	3, 4, 5	
Prohibit motorized mixed use	Josephine Creek – Illinois River	SONCC	11.97	3.43	8.54	Lower	0	NE	3, 5	Crosses anadromous habitat twice
			7.45	1.73	5.72	Lower	O	NE	4	
Prohibit motorized mixed use	Silver Creek	SONCC	4.59	0	4.59	Upper	9.30	NE	4	Ridgetop Road
Prohibit motorized mixed use	Klondike Creek – Illinois River	SONCC	0.20	0	0.20	Upper	1.25	NE	4	Ridgetop Road
Designate motorized mixed use	Shasta Costa – Rogue River	SONCC	0.17	0.12	0.05	Lower	0.70	NE	3, 5	Burnt Ridge Road
Designate motorized mixed use	S Fork Coquille	OC	3.09	1.58	1.51	Upper	9.35	NE	3	Eden Valley Road
Designate motorized mixed use	W Fork Cow Creek	OC	2.44	0.95	1.49	Upper	0	NE	3	Eden Valley Road
Designate motorized mixed use	Rogue River	SONCC	0.14	0	0.14	Lower	0.10	NE	3, 4	
Designate motorized mixed use	Headwaters Rogue River	SONCC	5.72	3.72	2.00	Middle	20+	NE	3	Upstream of Lost Creek Dam
Designate motorized mixed use	S Fork Rogue River	SONCC	16.21	2.44	13.77	Middle	20+	NE	3	Upstream of Lost Creek Dam
Designate motorized mixed use	Big Butte Creek	SONCC	0.82	0.07	.75	Middle	10.8	NE	3	Upstream of Butte Falls
Designate motorized mixed use	Little Butte Creek	SONCC	8.24	0.80	7.44	Upper	4.40	NE	3	
Prohibit motorized public use	W. Fork Illinois	SONCC	7.65	0.30	7.35	Middle	0.10	NE	3, 5	
			16.69	0.30	16.39	Up/Mid/Low	0.15	NE	4	
Prohibit motorized public use	Silver Creek	SONCC	0.65	0.23	0.42	Middle	13.8	NE	3, 4, 5	
Prohibit motorized public use	Josephine Creek – Illinois	SONCC	4.82	2.56	2.26	Mid/Low	0	NE	3, 5	Crosses

Activity	Watershed	ESU	Total Units (miles/ acres)	Units w/in Riparian Reserve	Units outside RR	Location in Watershed (lower, middle, upper)	Distance from Anadromous. Habitat	Effect Deter.	Alternative	Comments
	R.		11.50	4.13	7.37	Mid/Low	0	NE	4	anadromous habitat once
Prohibit motorized public use	Deer Creek	SONCC	1.52	1.20	0.32	Lower	0	NE	3, 5	Crosses anadromous habitat once
Prohibit motorized public use	Briggs Creek	SONCC	0.32	0	0.32	Upper	8.10	NE	4	Ridgetop Road
Prohibit motorized public use	N Fork Smith River	SONCC	15.89	1.17	14.72	Upper/Mid	0	NE	4	
Prohibit motorized public use	Chetco River	SONCC	3.27	0	3.27	Upper/Mid	0.35	NE	4	
Prohibit motorized public use	Winchuck River	SONCC	3.13	0	3.13	Middle	0.65	NE	4	
Construct motorized trial	Headwaters Applegate River	SONCC	1.18	0	1.18	Middle	6.30	NE	3, 5	Upstream of Applegate Dam
Construct motorized trial	Rogue River	SONCC	0.50	0	0.30	Middle	1.65	NLAA	3	
Develop Motorized Play Area	Big Butte Creek	SONCC	10 acres	0	0	Middle	11.00	NE	3	Outside CCH

The actions of the project can be divided into three Project Elements and are described below:

1) *Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use (Alternative 2, 3, 4, and 5).*
2) *Close Areas to Cross-Country Motorized Travel (Alternatives 2, 3, 4, and 5).*
3) *Convert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, Prohibit Motorized Public Use, and Construct Motorized Trail (Alternatives 3, 4, and 5).*

This analysis evaluates the potential direct and indirect effects of All Alternatives on SONCC Coho, SONCC Coho critical habitat, OC Coho, OC Coho critical habitat, Coho and Chinook EFH, SONCC Chinook Salmon, and OC steelhead. This analysis will discuss effects to CCH fish habitat for feasibility and readability, recognizing that CCH fully encompasses not only listed CCH, but also EFH and the distribution of SONCC Chinook Salmon and OC steelhead within the project area.

No Action Alternative

Under the No Action Alternative, no administrative or on-the-ground changes to the existing transportation system would occur. Current aquatic habitat conditions and trends would continue. The Rogue River LRMP (1990), Siskiyou LRMP (1989), and Northwest Forest Plan (1994) would continue to guide land management actions across the Forest. The direction provided within these plans is adequate to protect and maintain aquatic biota populations and habitat throughout the Forest. Any impact to the aquatic biota populations and habitat from the existing route network would continue. Route proliferation would continue to result within areas where cross-country travel is permitted.

Effects Common to All Action Alternatives (2, 3, 4, and 5)

Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use

These Forest Plan amendments are exclusively an administrative action. As such, there is **no causal** mechanism from these amendments to any of the habitat indicators. There is no on-the-ground construction, restoration or rehabilitation action included in this action.

Closing Areas to Cross-Country Motorized Travel

There is **no causal** mechanism from *Closing Areas to Cross-Country Motorized Travel* to any of the indicators, since this action involves an administrative change in the type of use that certain areas of the Forest would receive. There is no on-the-ground construction, restoration or rehabilitation action included in this action. The Motorized Vehicle Use Project would eliminate cross country motorized travel across the Forest, with the exception of the existing Woodruff Play Area on the High Cascades Ranger District (outside of CCH/anadromous habitat). This action would involve approximately 275,000 acres of land where cross country motorized travel is currently allowed. These areas are scattered across the Forest, and occur within and outside of anadromous fish occupied watersheds (See Table G-5).

Specific sites where *Closing Areas to Cross-Country Motorized Travel could occur*, as identified by USFS Recreation Specialists, are included in Table G-10. It is assumed that **areas currently open to cross-country motorized travel that are not included in Table G-10 are either receiving no or extremely low motorized use due to topographic limitations and/or recreation opportunities.** Accordingly, cross-country motorized closure of these areas (included in all Action Alternatives) provides no mechanism for direct and indirect effects to aquatic species and CCH.

Table G-10. Cross-Country Travel Areas that are Currently Receiving Use, and the Projected Use under Alternatives 2, 3 & 5

(Alternative 4 excludes all these routes)

Trail/Area Name	Watershed	CCH or EFH Present (Yes/No)	Current			Projected	
			Current Status	Current Level of Use	Cross-country user created route or FS Road/Trail?	Status Under All Action Alternatives	Projected Level of Use
Johnson Creek	South Fork Coquille River	Yes	Open to motorized use	Low (Weekend mining use during mining season)	User created routes	Closed to motorized use	None, unless approved via NOI or POO
Around 8 Dollar Mountain (old mining roads that should have been closed that people are using)	Josephine Creek-Illinois River	Yes	Open to motorized use	Low-Medium	User created routes	Closed to motorized use	None
Sourdough Camp (off the McGrew Trail) – (hill climb)	NF Smith River	Yes	Open to motorized use	Low	User created routes	Closed to motorized use	None
Red Flat Trail	Hunter Creek	No	Open to motorized use	Low	User created route	Closed to motorized use	None
Willow Lake Play Area	Big Butte Creek	No	Open to motorized use	Low-Medium	User created area	Closed to motorized use	None
Applegate Lake (French Gulch, Copper, Squaw) – (seasonal usage with people cruising in the flats of the lake bed when water is drawn down)	Headwaters Applegate River	No	Open to motorized use	Low	User created area	Closed to motorized use	None
Stringtown area (dispersed site where people park and travel up hillside)	Headwaters Applegate River	No	Open to motorized use	Low	User created route	Closed to motorized use	None
Spalding Pond (a lot of user created routes around a dispersed camping area)	Briggs Creek	No	Open to motorized use	Low	User created routes	Closed to motorized use	None
Signal Buttes	Hunter Creek, Rogue River	Yes	Open to motorized use	Low	Road (ML1) includes a user created route	ML 1 routes open to motorized use	Low
Kimball Hill	Rogue River	Yes	Open to motorized use	Low	Road (ML1)	Open to motorized use	Low

Low = used a couple times per year, High = used regularly during the summer

Convert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, and Prohibit Motorized Public Use

These actions occur on all Ranger Districts and are in proximity to SONCC CCH. There is no causal mechanism for *Convert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, and Prohibit Motorized Public Use* to all the Habitat Indicators and Watershed Condition Indicators because the affected routes are currently part of the RRSNF travel route network, and the action only involves an administrative change to the type of use (e.g. mixed-use, non-motorized, etc.) that an existing route would receive. There is no ground disturbing action from this activity. Road maintenance currently occurs and will continue. Any ground disturbing activity that may occur in the upcoming years (e.g. culvert replacement), would be covered under a different effects analysis and consultation process.

Alternative 2 - Direct and Indirect Effects

There are no direct effects to CCH from any action included in Alternative 2, because no ground disturbing action would occur within CCH.

Indirect effects to CCH from Alternative 2 would not occur. The rationale for this finding is disclosed within the "Effects Common to All Action Alternatives" section.

Alternative 3 (Proposed Action) - Direct and Indirect Effects

There are no direct effects to CCH from any action included in Alternative 3, because no ground disturbing action would occur within CCH.

Indirect effects to CCH from *Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use, Closing Areas to Cross-Country Motorized Travel, and Convert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, and Prohibit Motorized Public Use,* would not occur. The rationale for this finding is disclosed within the "Effects Common to All Action Alternatives" section.

Construct Motorized Trail

Woodruff Trail Connector – Rogue River Watershed

Approximately 0.5 miles of new motorized trail construction would occur within the Rogue River watershed, west of Quosatana Creek. The nearest CCH habitat is located 1.65 miles downstream of the proposed route, within Quosatana Creek. This action would potentially create a long-term sediment source within the Quosatana Creek subwatershed, with potential to indirectly impact water quality within a tributary to Quosatana Creek, and to a lesser extent (immeasurable) mainstem Quosatana Creek. The influx of additional sediment into tributaries of and mainstem Quosatana Creek could result in a persistent negative impact to instream habitat; though these effects would be immeasurable and indiscernible due to the existing roaded nature of the subwatershed, and its existing sediment load. Further, no effect to fish behavior would occur, as the sedimentation effects would be immeasurable.

Forest Trail #957 (Penn Sled) – Upper Applegate River Watershed

The trail is in a low precipitation area with no riparian crossings. The new trail segment does not cross a Riparian Reserve, and would have no impact on water quality (Joplin 2011).

This action would have no direct or indirect effect on CCH, as it is located upstream of the Applegate Dam; which is permanent barrier to anadromous fish species. Consequently, the Penn Sled Trail is located outside the range of CCH.

Alternative 4 - Direct and Indirect Effects

There are no direct effects to CCH from any action included in Alternative 4, because no ground disturbing action would occur within CCH.

Indirect effects to CCH from *Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use, Closing Areas to Cross-Country Motorized Travel, and* Convert *Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail (excluding trail #920 which is discussed below), Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, Prohibit Motorized Public Use* would not occur. The rationale for this finding is disclosed within the "Effects Common to All Action Alternatives" section.

Prohibit Motorized Use of an Existing Trail

Forest Trail #920 (Mule Creek) – Upper Applegate River Watershed

Trail #920 follows the majority of the main channel of Mule Creek up to the headwaters. This results in abundant tributary crossings near their confluence with the mainstem Mule Creek. The trail also intercepts many first order tributaries on its way to join Trail #919 at the ridge. The Squaw-Elliott Watershed Analysis states that Mule Creek typically becomes dry by June of most years and remains so until the autumn rains. This would tend to reduce the level of effect of motorized impact; however, motorized use following the channel so closely is inconsistent with ACS objectives maintaining and protecting stream bank integrity and aquatic vegetation. Mule Creek also is CCH near its confluence with the Applegate River; trail generated sediment is likely to be readily flushed into anadromous habitat (CCH located within 100 feet of the trail at its closest point). Prohibiting motorized use would alleviate some stream channel degradation, even if pedestrian use continues (Joplin 2011).

Elimination of motorized use along Trail #920 could result in an immeasurable indirect beneficial effect to CCH within Mule Creek, associated with reduced sediment influx. Though the continued presence of the trail and use by non-motorized traffic would continue create sediment, similar to the existing condition.

Alternative 5 (Preferred Alternative) - Direct and Indirect Effects

There are no direct effects to CCH from any action included in Alternative 5, because no ground disturbing action would occur within CCH.

Indirect effects to CCH from *Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use, Closing Areas to Cross-Country Motorized Travel, and* Convert *Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, and Prohibit Motorized Public Use,* would not occur. The rationale for this finding is disclosed within the "Effects Common to All Action Alternatives" section.

Construct Motorized Trail

Forest Trail #957 (Penn Sled) – Upper Applegate River Watershed

The trail is in a low precipitation area with no riparian crossings. The new trail segment does not cross a Riparian Reserve, and would have no impact on water quality (Joplin 2011).

This action would have no direct or indirect effect on CCH, as it is located upstream of the Applegate Dam; which is permanent barrier to anadromous fish species. Consequently, the Penn Sled Trail is located outside the range of CCH.

VI. CUMULATIVE EFFECTS

Cumulative effects are those that result from the incremental accumulations of all land management activities across all ownerships. On the RRSNF, historic land management activities such as hydraulic mining, diking, channelization, riparian timber harvest, dam construction, large wood removal, flow alteration, floodplain development, and road construction have had an enduring and significant impact on salmonid production. Since adoption of the Northwest Forest Plan in 1994, many of the streams on public land are likely recovering from prior management activities due to current management guidelines and policies. For example, Gallo et al. (2005) and Reeves et al. (2006) assessed 250 sixth-field watersheds in the Pacific Northwest and found a general increase in stream habitat quality in the first 10 years after the adoption of the Northwest Forest Plan, particularly in key watersheds and late-successional reserves (LSR).

Several recent past and foreseeable future projects on the RRSNF have dealt with road generated sediment, and sediment influx into fish bearing habitats. These include the Applegate-McKee Legacy Roads Project (2010), Copper-Salmon Legacy Roads Project (2012), Sucker Creek Legacy Roads Project (planning in progress), and multiple small scale road decommission projects, as well as ongoing road maintenance activities. With the exception of the *trail construction* included in Alternative 3, and the *prohibiting of motorized use of an existing trail* in Alternative 4, all actions included in the Action Alternatives would result in no effect to fish and aquatic habitats across the forest. Thus, there is no mechanism for actions included in the alternatives to result in cumulative effects to fish and fish habit in concert with projects listed above.

The proposed trail construction in Alternative 3 could result in cumulative sedimentation effects within the affected watersheds, through an expansion of the road and motorized trail system. The beneficial effect of elimination motorized use of Mule Mountain Trail (#920) on fish habitat would be cumulative with the reduction of road generated sediment and sediment influx into fish bearing habitats associated with the Applegate-McKee Legacy Roads Project.

VII. COMPARISON OF ALTERNATIVES

Table G-11. Comparison of Effects to CCH for Each Alternative by Activity Type

Alternative	Close area to Motorized Cross-country Travel (acres)	Convert ML1 Road to Motorized Trail (miles)	Prohibit Motorized use of an existing Trail (miles)	Prohibit motorized Mixed Use (miles)	Designate Motorized Mixed Use (miles)	Prohibit Motorized Public Use (miles)	Construct Motorized Trail (miles)	Develop Motorized Play Area (acres)
1	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
2	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
3	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	**Negative**	Neutral
4	Neutral	Neutral	Neutral	Neutral	Neutral	**Beneficial**	Neutral	Neutral
5	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

The **No Action** Alternative would not alter the existing travel management system on the Forest. Thus, a neutral effect to TES aquatic species or habitat would occur.

All of the Action Alternatives, 2 through 5, would have a similar neutral effect from "*Enact Forest-wide plan amendments to make the plans consistent with the Travel Management Rule and current historical motorized use" and* "C*onvert Maintenance Level 1 Road to Motorized Trail, Prohibit Motorized Use on an Existing Trail, Prohibit Motorized Mixed Use, Designate Motorized Mixed Use, and Prohibit Motorized Public Use"*. These Forest Plan amendments are exclusively an administrative action. There is no on-the-ground construction, restoration or rehabilitation included in this action. The affected routes are currently part of the RRSNF travel route network, and the action only involves an administrative change to the type of use (e.g. mixed-use, non-motorized, etc.) that an existing route would receive. Road maintenance currently occurs and will continue. Any ground disturbing activity that may occur in the upcoming years, i.e., culvert replacement, would be covered under a different effects analysis and consultation process.

All of the Action Alternatives**, 2 through 5,** would result in No Effect to TES aquatic species from the "*close area to motorized cross-country travel*" action. Areas that are currently receiving cross country motorized use (Table G-11) are not affecting CCH.

Specific to **Alternative 3**, the construction of new motorized trail (Woodruff Trail) in the Quosatana Creek subwatershed could result in new sediment delivery to CCH. Though, given the extensive roaded nature of the subwatershed, sediment effects from this new trail segment on TES aquatic species would be immeasurable and indiscernible, given the ongoing sediment load within the subwatershed.

Specific to **Alternative 4,** elimination of motorized use along Trail #920 could result in an immeasurable beneficial effect to Coho critical habitat within Mule Creek, associated with reduced sediment influx; though the continued presence of the trail and use by non-motorized traffic would maintain the current sediment regime, similar to the existing condition.

Effects to the TES aquatic species are overall similar under all of the Action Alternatives, 2 through 5. This is due to a similar range of site specific activities, locations and associated effects included in the alternatives. The differences in effects of the activities between Action Alternatives are minimal and would create no measurable positive or negative sediment delivery difference on TES aquatic species and habitat.

VIII. CONCLUSIONS OF DETERMINATIONS

Alternative 1 – No Action
Alternative 1 would have no direct, indirect or cumulative effects to SONCC Coho Salmon, SONCC Coho CH, OC Coho Salmon, OC Coho CH, Coho and Chinook Essential Fish Habitat, Southern DPS North American Green Sturgeon, Southern DPS Pacific Eulachon, SONCC Chinook Salmon, OC steelhead, PC Chum Salmon, western ridged mussel, highcap lanx, scale lanx, robust walker, pacific walker, Haddock's rhyacophilan caddisfly, or the *Namamyia plutonis*.

Alternative 2
Based on a review of best available science and my professional judgment, I find that Alternative 2 would result in no effects to OC and SONCC Coho Salmon, OC and SONCC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon on the RRSNF. Thus, a **No Effect** determination is rendered for SONCC Coho Salmon, SONCC Coho Salmon critical habitat, OC Coho Salmon, OC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon.

This alternative would have No Effect to Essential Fish Habitat for Coho Salmon and Chinook Salmon. Further, Alternative 2 would have **No Impact** to SONCC Chinook Salmon, OC steelhead, PC Chum Salmon, western ridged mussel, highcap lanx, scale lanx, robust walker, pacific walker, Haddock's rhyacophilan caddisfly, or the Namamyia plutonis.

Alternative 3 – Proposed Action

I also find that Alternative 3 (excluding the Woodruff Trail connector) would result in no effects to OC and SONCC Coho Salmon, OC and SONCC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon on the RRSNF. Thus, a **No Effect** determination is rendered for SONCC Coho Salmon, SONCC Coho Salmon critical habitat, OC Coho Salmon, OC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon. This alternative would have **No Effect** to Essential Fish Habitat for Coho Salmon and Chinook Salmon. Further, Alternative 3 would have **No Impact** to SONCC Chinook Salmon, OC steelhead, PC Chum Salmon, western ridged mussel, highcap lanx, scale lanx, robust walker, pacific walker, Haddock's rhyacophilan caddisfly, or the *Namamyia plutonis*.

Construction of the Woodruff Trail connector would create a new sediment source within the Quosatana Creek subwatershed, which is CCH and occupied by SONCC Chinook Salmon. Accordingly this action **May Affect, Not Likely to Adversely Affect** SONCC Coho Salmon and SONCC Coho CH and EFH for Coho Salmon and Chinook Salmon. Further, this action **May Impact Individuals or Habitat, But Will Not Likely Contribute to a Trend Towards Federal Listing or Cause a Loss of Viability to the Population or Species** (SONCC Chinook Salmon).

Alternative 4

I find that indirect and cumulative effects from Alternative 4 would result in positive effects to SONCC Coho Salmon and SONCC Coho Salmon critical habitat on the RRSNF. Thus, a **Beneficial, May Affect, Not Likely to Adversely Affect** determination is rendered for SONCC Coho Salmon, and SONCC Coho Salmon critical habitat. This determination is exclusively linked to prohibiting motorized use on Forest Trail #920 within Mule Creek, and the potential decrease in upland erosion and sediment influx into stream channels that could result from this action. Alternative 4 would result in no effects to OC Coho Salmon, OC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon on the RRSNF. Thus, a **No Effect** determination is rendered for OC Coho Salmon, OC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon. This alternative would have a **Beneficial Effect** to Essential Fish Habitat for Coho Salmon and **No Effect** to Essential Fish Habitat for Chinook Salmon. Further, Alternative 4 would have **No Impact** to SONCC Chinook Salmon, OC steelhead, PC Chum Salmon, western ridged mussel, highcap lanx, scale lanx, robust walker, pacific walker, Haddock's rhyacophilan caddisfly, or the *Namamyia plutonis*.

Alternative 5-Preferred Alternative

I also find that Alternative 5 would result in no effects to OC and SONCC Coho Salmon, OC and SONCC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon on the RRSNF. Thus, a **No Effect** determination is rendered for SONCC Coho Salmon, SONCC Coho Salmon critical habitat, OC Coho Salmon, OC Coho Salmon critical habitat, Southern DPS North American Green Sturgeon, and Southern DPS Pacific Eulachon. This alternative would have **No Effect** to Essential Fish Habitat for Coho Salmon and Chinook Salmon. Further, Alternative 5 would have **No Impact** to SONCC Chinook Salmon, OC steelhead, PC Chum Salmon, western ridged mussel, highcap lanx, scale lanx, robust walker, pacific walker, Haddock's rhyacophilan caddisfly, or the *Namamyia plutonis*.

Table G-12. Summary of Conclusion of Effects

Species and/or Habitat	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5
SONCC Coho	NE	NE	NLAA	B-NLAA	NE
SONCC Coho CH	NE	NE	NLAA	B-NLAA	NE
OC Coho	NE	NE	NE	NE	NE
OC Coho CH	NE	NE	NE	NE	NE
S. DPS North American Green Sturgeon	NE	NE	NE	NE	NE
S. DPS Pacific Eulachon	NE	NE	NE	NE	NE
EFH – Coho	NE	NE	NLAA	B-NLAA	NE
EFH – Chinook	NE	NE	NLAA	NE	NE
SONCC Chinook	NI	NI	MIIH	NI	NI
OC steelhead	NI	NI	NI	NI	NI
PC Chum	NI	NI	NI	NI	NI
Western ridged mussel	NI	NI	NI	NI	NI
Highcap lanx	NI	NI	NI	NI	NI
Scale lanx	NI	NI	NI	NI	NI
Robust walker	NI	NI	NI	NI	NI
Pacific walker	NI	NI	NI	NI	NI
Haddock's rhyacophilan caddisfly	NI	NI	NI	NI	NI
Namamyia plutonis	NI	NI	NI	NI	NI

NE = No Effect
B-NLAA = Beneficial, Not Likely to Adversely Affect
NI = No Impact
MIIH = May Impact Individuals or Habitat, But Will Not Likely Contribute to a Trend Towards Federal Listing or Cause a Loss of Viability to the Population or Species
BI = Beneficial Impact

IX. LITERATURE CITED

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Appendix H

Motorized Trail Class and Season of Use by Ranger District

Trail #	Name	BMP	EMP	Open Period	Class I		Class II		Class III	
High Cascades Ranger District										
2	West OHV Trail	0	26	Seasonal		07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30
2	West OHV Trail	26	44	Seasonal	Open	07/01-10/12 10/23-11/31			Open	07/01-10/12 10/23-11/31
3	Discovery OHV	0	49	Seasonal	Open	07/01-10/12		07/01-10/12	Open	07/01-10/12
3	Discovery OHV	49	58.4	Seasonal	Open	07/01-10/12	Open	07/01-10/12 10/23-11/30	Open	07/01-10/12
21	Round Top OHV Trail	0	8.3	Seasonal	Open	07/01-10/12 10/23-11/30	Open		Open	07/01-10/12 10/23-11/30
22	Sunshine OHV	0	1.3	Seasonal					Open	07/01-10/12
23	Golden Stairs OHV Trail	0	17.2	Seasonal					Open	07/01-10/12
24	Elk OHV	0	1.6	Seasonal					Open	07/01-10/12
25	Hershberger OHV	0	7	Seasonal	Open	07/01-10/12			Open	07/01-10/12
26	Hershberger Lookout Ohv	0	2	Seasonal	Open	07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30
27	Foster Creek OHV	0	11	Seasonal	Open	07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30

Trail #	Name	BMP	EMP	Open Period	Class I		Class II		Class III	
31	Union Creek (South) OHV	0	4.3	Seasonal	Open	07/01-10/12 10/23-11/30		07/01-10/12	Open	07/01-10/12 10/23-11/30
32	Red Blanket OHV	0	13.1	Seasonal	Open	07/01-10/12	Open		Open	07/01-10/12
33	Huckleberry Mountain OHV	0	0.2	Seasonal	Open	07/01-10/12		07/01-10/12	Open	07/01-10/12
35	Union Creek (North) OHV	0	1.8	Seasonal	Open	07/01-10/12	Open	07/01-10/12	Open	07/01-10/12
36	Hamaker Bluff OHV	0	9.6	Seasonal	Open	07/01-10/12	Open		Open	07/01-10/12
37	Minnehaha OHV	0	6.3	Seasonal	Open	07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30
38	Lake West OHV	0	5	Seasonal				07/01-10/12 10/23-11/30	Open	07/01-10/12 10/23-11/30
39	Sherwood OHV Trail	0	6	Seasonal	Open	07/01-10/12 10/23-11/30	Open		Open	07/01-10/12 10/23-11/30
40	Perimeter OHV	0	1.4	Seasonal					Open	07/01-10/12 10/23-11/30
42	Nordic OHV	0	5.4	Seasonal	Open	07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30
45	Needle Creek OHV	0	2.7	Seasonal	Open	07/01-10/12			Open	07/01-10/12
47	Jim Creek OHV	0	2.1	Seasonal	Open	07/01-10/12			Open	07/01-10/12
49	Mccall Creek OHV	0	3.8	Seasonal	Open	07/01-10/12			Open	07/01-10/12
53	Horse OHV	0	3.1	Seasonal	Open	07/01-10/12			Open	07/01-10/12

Trail #	Name	BMP	EMP	Open Period	Class I		Class II		Class III	
54	River Loop OHV	0	2.9	Seasonal					Open	07/01-10/12 10/23-11/30
58	Hamaker Butte	0	5	Seasonal				07/01-10/12 10/23-11/30	Open	07/01-10/12 10/23-11/30
64	River Road OHV	0	3.8	Seasonal	Open	07/01-10/12 10/23-11/30	Open		Open	07/01-10/12 10/23-11/30
65	Highway OHV	0	2.3	Seasonal	Open	07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30
68	Woodruff Pavement OHV	0	3.5	Seasonal	Open	07/01-10/12			Open	07/01-10/12
1P	Motocross Track OHV	0	0.7	Seasonal	Open	07/01-10/12 10/23-11/30			Open	07/01-10/12 10/23-11/30
2P	Boring Trail OHV	0	0.9	Seasonal	Open	06/15-10/12 10/23-11/30			Open	06/15-10/12 10/23-11/30
3P	Maze Trail OHV	0	0.9	Seasonal	Open	06/15-10/12 10/23-11/30			Open	06/15-10/12 10/23-11/30
4P	Learner's Loop OHV	0	1	Seasonal	Open	06/15-10/12 10/23-11/30			Open	06/15-10/12 10/23-11/30
Siskiyou Mountains Ranger District										
900	O'brien Creek Trail	0	2.3	Yearlong					Open	01/01-12/31
903	Sturgis Fork Trail	0	0.8	Yearlong					Open	01/01-12/32
918	Charlie Buck/Baldy Peak Trail	0	1.5	Seasonal					Open	01/01-12/31

Trail #	Name	BMP	EMP	Open Period	Class I		Class II		Class III	
919	Mule Mountain Trail	0	4	Seasonal					Open	05/01-10/31
920	Mule Creek Trail	0	4.3	Seasonal					Open	05/01-10/31
921	Little Grayback Trail	0	4	Seasonal					Open	05/01-10/31
926	Summit Lake Trail	0	2	Yearlong					Open	05/01-10/31
928	New London Trail	0	2.6	Yearlong					Open	01/01-12/31
929	Stein Butte Trail	0	4.9	Yearlong					Open	01/01-12/31
930	Carlton Pasture Trail	0	1.6	Yearlong					Open	01/01-12/31
959	Cook And Green Trail	0	8.2	Yearlong					Open	01/01-12/31
969	Elliott Ridge Trail	0	1.7	Yearlong					Open	01/01-12/31
1207	Boundary Trail	4.02	11	Yearlong					Open	01/01-12/31
Wild Rivers Ranger District										
1130	China Creek Trail	0	4.5	Yearlong						
1132	Briggs Creek Trail	0	9.5	Yearlong					Open	01/01-12/31
1146	Dutchy Creek Trail	0	7.9	Yearlong					Open	01/01-12/31
1156	Minnow Creek Trail	0	5.5	Yearlong					Open	01/01-12/31
1230	Elk Creek	0	2	Yearlong					Open	01/01-12/31
1281	Onion Way	0	2.1	Yearlong					Open	01/01-12/31
1282	Secret Way Trail	0	3.2	Yearlong					Open	01/01-12/31
1142A	Big Pine Access Spur	0	1.3	Yearlong					Open	01/01-12/31
1146A	Sam Brown Tie Trail	0	0.3	Yearlong					Open	01/01-12/31

Trail #	Name	BMP	EMP	Open Period	Class I		Class II		Class III	
1282A	Secret Way Spur Trail	0	0.6	Yearlong					Open	01/01-12/31
Gold Beach Ranger District										
1158	Maine	0	1.72	Yearlong					Open	01/01-12/31
1161	Illinois River Trail	0	4.96	Seasonal					Open	9/15-5/15
1166	Silver Peak - Hobson Horn Trai	0	18.3	Yearlong					Open	01/01-12/31
1169	Game Lake	6.5	8.55	Yearlong					Open	01/01-12/32
1170	Pine Grove	3.81	7	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1173	Lawson Creek	4.6	8	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1179	Jeffrey	0	1.75	Yearlong					Open	01/01-12/31
1180	Fish Hook Interpretive	0	2.5	Yearlong					Open	01/01-12/31
1211.1	Quail	0	2.41	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1212.1	Valley	0	0.6	Yearlong	Open	01/01-12/32			Open	01/01-12/31
1213.1	Signal Buttes	0	4.25	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1214.1	Kimball	0	1.697	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1215.1	Adams	0	1.03	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1216.1	Snout Creek	0	0.66	Yearlong	Open	01/01-12/31			Open	01/01-12/31
Powers Ranger District										
1101	Johnson Creek	0	2.4	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1154	Russian Mike			Yearlong	Open	01/01-12/32			Open	01/01-12/32
1155	So. Fork Sixes			Yearlong	Open	01/01-12/31			Open	01/01-12/31

Trail #	Name	BMP	EMP	Open Period	Class I		Class II		Class III	
1256	Sucker Creek (Powers)	0	2.4	Yearlong	Open	01/01-12/31			Open	01/01-12/31
1262	Azelea Lake	0	1.4	Yearlong	Open	01/01-12/31			Open	01/01-12/31

Appendix I

Errata Sheet: Road And Trail Corrections

(Applies to existing conditions and all alternatives)

Road or Trail	Miles	Correction	Reasons	
Siskiyou Mts District				
FDR 2080.500	0.13	Add	Maintenance Level error in database	Did not match signed RMO (ML2)
FDR 1075.700	2.45	Remove	Maintenance Level error in database	Did not match signed RMO (ML1)
FDR 2110.350	1.06	Remove	Maintenance Level error in database	Did not match signed RMO (ML1)
FDR 1050 MP 2.33 - MP 4.01	1.68	Modify to motorcycle only	Temporary closure for protection of historic structure	New RMO
Unnamed trail paralleling County RD 859 south of Applegate Lake	1.70	Remove	Error in GIS coverage	Trail was removed from the system prior to 2000
FDR 1000605 FDR 1090800 FDR 1095650 FDR 1095665 FDR 2010140 FDR 2010142	0.80 1.16 1.47 0.27 1.32 0.85	Remove	Converted to closed roads	Applegate-Mckee Watershed Restoration DN – October, 2009
FDR 1010300 FDR 1010545 FDR 1010550 FDR 1010558 FDR 1090500 FDR 1095350 FDR 1095657 FDR 1095750 FDR 1095760 FDR 1095770 FDR 1095800 FDR 1095860 FDR 2000860 FDR 2000864 FDR 2000889 FDR 2000890 FDR 2000906 FDR 2000910 FDR 2000915 FDR 2000940 FDR 2010200 FDR 2010250 FDR 2010252 FDR 2010300 FDR 2010330	1.21 0.10 0.34 0.55 1.14 1.19 0.67 1.13 0.88 0.46 0.52 0.66 0.25 0.23 0.03 2.88 0.90 0.27 0.47 3.27 2.20 0.89 1.23 1.90 0.65	Remove	Roads have been decommissioned	Applegate-Mckee Watershed Restoration DN – October, 2009

Road or Trail	Miles	Correction	Reasons	
Wild Rivers District				
FDR 4611.070	1.00	Tie through to FDR 4611	Error in GIS coverage	
FDR 4904.060	1.03	Remove	Road is closed with a washout	
FDR 2200.679 FDR 2200.681 FDR 2200.620	0.78 0.39 1.26	Add	Maintenance Level error in Database	Did not match signed RMO (ML2)
Salt Creek Road (BLM)	1.88	Add	Error in GIS coverage	
FDR 2600.050	2.30	Remove	No Forest Service easement across private lands	
Powers District				
FDR 5000200 FDR 5000420 FDR 5000440 FDR 5000449	1.50 0.60 0.37 0.50	Remove	No Forest Service easement across private lands	
FDR 5000310	0.50	Remove	Maintenance Level error in Database	Did not match signed RMO (ML1)
FDR 3353014	7.70	Add	Database error, seasonally closed, not permanently	Did not match signed RMO (ML2)
FDT 11-1 Johnson Creek Trail	2.70	Remove	This trail is not accessible for motorized use and never has been	Database error
FDR 3353.260 MP 0.0 to MP 2.40	1.60	Convert this portion of Sucker Creek Trail to road	Error in GIS coverage	Did not match signed RMO (ML2)
Gold Beach District				
FDT 1168 – Rogue River Trail	6.70	Remove section of trail west of Agness	County Jurisdiction	
FDR 3533320	1.00	Remove	No Forest Service easement across private lands	
FDR 3313151 FDR 3313150	1.10 2.45	Add	Maintenance Level error in Database	Did not match signed RMO (ML2)
FDT 1279	1.86	Add	Existing motorized trail left off map	Error in GIS coverage
High Cascades District				
FDR 3795140	0.60	Remove	Maintenance Level error in Database	Did not match signed RMO (ML1)
FDR 3795142	0.40	Remove	Maintenance Level error in Database	Did not match signed RMO (ML1)
FDR 6530610	0.60	Remove	Maintenance Level error in database (decommissioned)	

Additional Road And Trail Corrections Identified for 2014 FSEIS

Road or Trail	Miles	Correction	Reasons	
Copper Salmon **Powers**	15.3	Remove	Mixed use roads removed because of inclusion in Wilderness area	Motorized use is not allowed in Wilderness areas
Grassy Knob **Powers**	0.8	Remove	Mixed use roads removed because of inclusion in Wilderness area	Motorized use is not allowed in Wilderness areas. Route 5105 within the "cherry-stem" exclusion of Grassy Knob Wilderness; managed as non-motorized to help preserve wilderness characteristics
Signal Buttes **Gold Beach** 3680-196	0.1	Remove	ML 2 open mixed use, no access	
4400-443 **Wild Rivers**	0.1	Remove	Orphan segment error	No access over private land
Signal Buttes **Gold Beach**	1.2	Remove	Conversion of non-authorized routes to motorized trails requires additional NEPA analysis.	Use is causing ongoing resource damage in this area of unique botanical and cultural resource values
Red Flat Trail **Gold Beach**	1.5	Remove	Non-authorized route that was not analyzed.	Crosses over BLM land
Shasta Costa (trail) **Gold Beach**	0.9	Remove	Non-authorized route that was not analyzed.	
Fairview **Gold Beach** 3680-351OB	1.7	Remove	Obliterated in 1996	
Fairview **Gold Beach** 3680-353OB	1.5	Remove	Obliterated	
Nancy Creek Overlook **Gold Beach** Ref #2	1.0	Remove	The Nancy Creek routes are not authorized routes and were not analyzed	
Mule Mountain **Siskiyou Mountains**	2.4	Remove	Non-authorized route that was not analyzed.	
Mule Mountain **Siskiyou Mountains** 919	1.1	Remove	One segment crosses private land with no easement	
Ninemile **Siskiyou Mountains** 1010 segment 1010299	1.1	Remove	No easement	

List of acronyms used in above tables:

BLM Bureau of Land Management
DN Decision Notice
FDR Forest Development Road
FDT Forest Development Trail
GIS Geographic Information Systems
ML Maintenance Level
MP Milepost
RMO Road Management Objective