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Agriculture

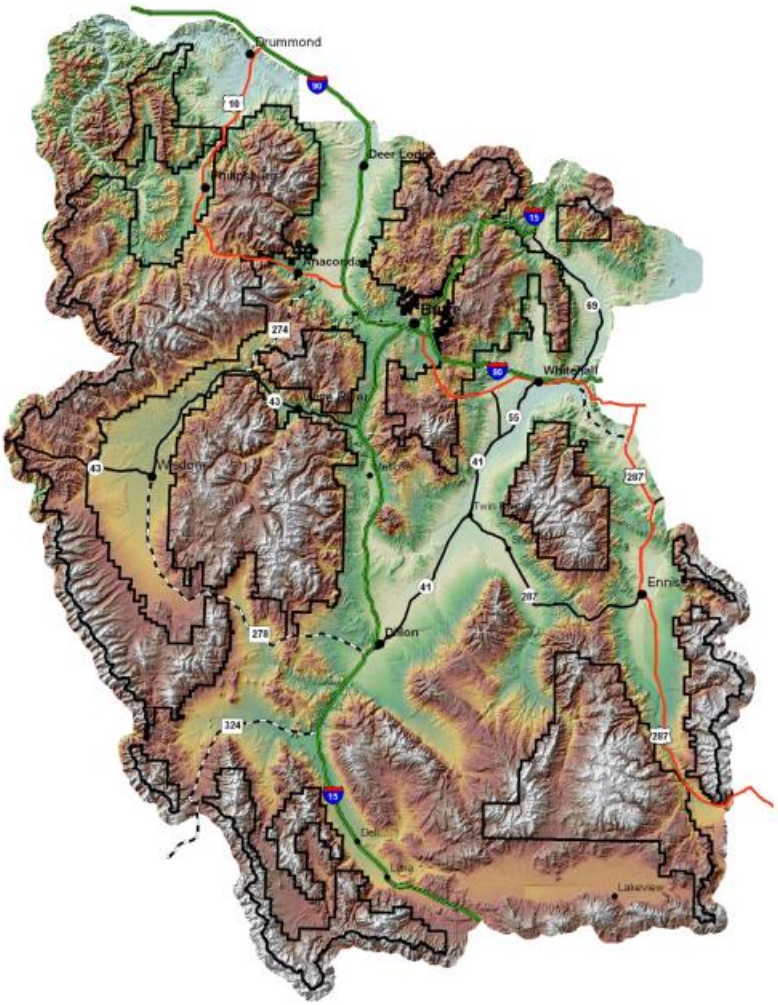
Forest Service

Beaverhead-Deerlodge
National Forest

March 2014

Beaverhead-Deerlodge National Forest Land and Resource Management Plan

Draft Supplemental Environmental Impact Statement to Comply with a District of Montana Court Order (Temporary Roads)



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Draft Supplemental Environmental Impact Statement for Beaverhead-Deerlodge National Forest Land and Resource Management Plan to Comply With a District of Montana Court Order (Temporary Roads)

Counties	Beaverhead, Deer Lodge, Gallatin, Granite, Jefferson, Madison, Powell and Silver Bow
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Abstract: In a May 24, 2013 Order, the U.S. District Court for the District of Montana directed the Forest Service to supplement the 2009 Corrected FEIS for the Beaverhead-Deerlodge National Forest Plan to explain or support its decision to exclude temporary roads from the Forest Plan road density objectives. This Draft Supplemental EIS evaluates the effect of not including temporary roads in Open Motorized Road and Trail Density goals on Forest Plan EIS issues.

Reviewers should provide the Forest Service with their comments during the review period of the draft supplemental environmental impact statement. This will enable the Forest Service to analyze and respond to the comments at one time and to use information acquired in the preparation of the final environmental impact statement, thus avoiding undue delay in the decision making process. Reviewers have an obligation to structure their participation in the National Environmental Policy Act process so that it is meaningful and alerts the agency to the reviewers' position and contentions. Comments on the draft environmental impact statement should be specific and should address the adequacy of the statement and the merits of the alternatives discussed (40 CFR 1503.3).

Send Comments to:	Melany Glossa Forest Supervisor 420 Barrett Street Dillon, MT 59725
Email comment address	comments-northern-beaverhead-deerlodge@fs.fed.us - please type Draft SEIS in the subject line.
FAX Comments to	(406) 683-3855
Comments Must Be Received by:	Comments must be received no later than 90 days after the Notice of Availability (NOA) for the Draft SEIS is published in the Federal Register. A copy of the NOA will be posted on the Forest Plan page at: http://www.fs.usda.gov/goto/bdnf/forest-plan. Scroll to the bottom of the page. Click on the "Link to Environmental Impact Statement and subsequent supplemental analyses."

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Purpose of the Supplemental Analysis

In a May 24, 2013 Order, the U.S. District Court for the District of Montana directed the Forest Service to supplement the 2009 Corrected Final Environmental Impact Statement (Corrected FEIS) for the Beaverhead-Deerlodge National Forest (BDNF) Plan. This Supplemental Environmental Impact Statement (SEIS) evaluates the effects of temporary roads in order to comply with the Court Order specifically directing the Forest Service to "…supplement its EIS for the Forest Plan to explain or support, if possible, its decision to exclude temporary roads from the road density objectives…."(Court Order, pg. 4).

Specifically, this SEIS addresses the issue: What is the effect of not including temporary roads in Open Motorized Road and Trail Density goals[1] on Forest Plan EIS issues?

The Forest Plan (pg. 304) defines a temporary road or trail as a "road or trail necessary for emergency operations or authorized by contract, permit, lease, or other written authorization that is not a forest road or trail and that is not included in a forest transportation atlas (36 CFR 212.1)."

Background

In 2009, Regional Forester Thomas Tidwell signed a Record of Decision (ROD)[2] for the BDNF Plan FEIS[3] and approved the 2009 Forest Plan[4]. The Forest Plan provides management direction for activities on the BDNF for the next 10 to 15 years, including direction on eight revision topics (vegetation, wildlife, aquatic resources, recreation and travel management, fire management, livestock grazing, timber and recommended wilderness). This direction replaced previous management direction from the 1986 Beaverhead National Forest Plan and the 1987 Deerlodge National Forest Plan.

The 504 page Forest Plan provides management direction for activities on the 3.38 million acre BDNF[5] and prescribes forest-wide management goals, objectives and standards for 17 specific resources and additional direction specific to 86 management areas. Since Forest Plan direction applies to all projects with decisions made on or after the effective date of the ROD (pg. 38), the BDNF began applying Forest Plan direction to site-specific project proposals in 2009. Subsequent site specific project analysis of wildlife-related goals, objectives and standards (Forest Plan, pgs. 45-48) caused the Forest Service to question the method for calculating Forest Plan open motorized road and trail densities (OMRTD) related to the construction and use of temporary roads. Should temporary roads primarily associated with vegetation management and mineral exploration proposals and closed and/or obliterated at project completion be included in Forest Plan landscape and hunting unit OMRTDs?

In 2012, Native Ecosystems Council and Alliance for the Wild Rockies filed a complaint in U.S. District Court for the District of Montana (case 9:121-CV-00027-DLC) alleging, in part, the Forest Plan failed to ensure elk viability because the Forest Service did not disclose and consider the best available science in its analysis of road density. In a May 24, 2013 Order, the U.S. District Court for the District of Montana found the Forest Service "…complied with the general requirements of the 1982 viability regulation for elk and adequately disclosed the science upon which it relied to determine appropriate road density levels

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[1] The objectives referenced in the Court Order are actually Forest Plan Goals identified as Desired Open Motorized Road and Trail Density (see Forest Plan Tables 13 and 14, pgs. 45-46).
[2] http://www.fs.usda.gov/detail/bdnf/landmanagement/planning/?cid=stelprdb5427140
[3] http://www.fs.usda.gov/detail/bdnf/landmanagement/planning/?cid=stelprdb5427140
[4] http://www.fs.usda.gov/goto/bdnf/forest-plan
[5] BDNF lands in the Elkhorn Mountains are managed in cooperation with the Helena National Forest. Revision of management direction for the Elkhorn Moutnains will take place during revision of the Helena National Forest Plan (ROD, pg. 32 and Corrected FEIS, pg. 1).

for areas with different management goals…. However, the Forest Service did not explain or support its decision to exclude temporary roads from the road density objectives."

The Court also ordered the Forest Service to "…correct the record to show that permitted and administrative roads are included in the objectives." On August 23, 2013, the BDNF complied with this part of the Court Order. The Forest Plan available on the BDNF web page (see footnote 4) includes these corrections within the context of the entire document. The Forest Plan "Correction Package" is also available on the web or by request. Description of Forest Plan direction in this SEIS includes the August 23, 2013 corrections.

Decision Framework

To comply with the May 24, 2013 Order by the U.S. District Court for the District of Montana (case 9:121-CV-00027-DLC), the BDNF will supplement the Forest Plan Corrected FEIS to "…explain or support, if possible, its decision to exclude temporary roads from road density objectives...."

The Forest Supervisor will decide whether or not changes to management direction in the Forest Plan are needed, based on this court-ordered analysis.

Public Involvement

The Notice of Intent (NOI) for the preparation of this SEIS was published in the Federal Register on September 9, 2013. No public comment was solicited at that time (pursuant to 40 CFR 1502.9(c)(4)). The draft SEIS will be made available to interested members of the public and comments will be accepted for 90 days following publication of the Notice of Availability in the Federal Register, pursuant to 36 CFR 219.16(a)(2). A legal notice for this Draft SEIS comment period will also be published in the Montana Standard.

Forest Plan Implementation 2009-Present

The Forest Plan wildlife security goal[6] established OMRTDs for 11 separate landscapes varying from 0.0 to 2.0 miles/square mile. The wildlife security goal is associated with an objective[7] to reduce OMRTDs in the Boulder River and Jefferson River Landscapes. In addition, the Forest Plan elk security goal established fall (October 15-December 1) OMRTDs for 29 hunting units varying from 0.0 to 1.8 miles/square mile. This goal is associated with an objective to reduce OMRTDs from October 15 to December 1 in hunting units 215, 300, 302, 318, 333, 341 and 350. Forest Plan Wildlife Habitat Standards[8] 1 and 2 prohibit a net increase in designated open motorized road and trail mileage in landscapes and hunting units exceeding OMRTD objectives (Forest Plan, pgs. 45-48).

Table 1 displays temporary roads constructed for timber harvest and mineral exploration since the 2009 Forest Plan decision. As of January, 2014, (5 years from the Forest Plan decision) only 5.38 miles of temporary road have actually been constructed. All 5.38 miles are already obliterated and are no longer present on the landscape. Figures 1-4 photographically display temporary roads constructed for resource extraction on the BDNF and closed/obliterated at project completion.

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[6] A Forest Plan Goal is a concise statement that describes a desired condition to be achieved sometime in the future, normally expressed in broad, general terms and is timeless in that it has no specific date by which it is to be completed (Forest Plan, pg. 290).

[7] A Forest Plan Objective is a concise, time-specific statement of measurabled planned results that respond to pre-established goals. An objective forms the basis for further planning to define precise steps to be taken and the resources to be used in achieving identified goals (Forest Plan, pg. 295).

[8] A Forest Plan Standard is a particular action, level of performance or threshold specified by the Forest Plan for resource protection or accomplishment of managmeent objectives. Unlike "guidelines" which are optional, standards are mandatory. Standards are applied to management actions as mitigation; they do not initiate management actions (Forest Plan, pg. 304).

Table 1 also displays reasonably foreseeable temporary roads associated with current proposals on the BDNF. These proposals are currently under analysis. The eventual project decision may alter the amount of temporary roads. The proposed temporary roads are disclosed in Table 1 to give reviewers a sense of the amount of temporary roads that may be constructed in the future. As proposed, these temporary roads would not be open to public motorized use and would be closed or obliterated upon completion of timber harvest or mineral exploration activities.

Table 1- Miles of Temporary Roads Associated with Timber Harvest and Mineral Exploration since 2009

Project	PAST	PRESENT	REASONABLY FORESEEABLE	TOTAL
	Constructed & Obliterated	Constructed & Currently Available for Use	New Temporary Road to be closed or obliterated at project completion	
Rat Creek Timber Sale	4.8	-	-	4.8
Birch/Willow/Lost	-	-	0.5	0.5
Boulder River Integrated	-	-	12.9	12.9
East Deerlodge Valley Restoration	-	-	9.0	9.0
Fleecer Mountain	-	-	5.9	5.9
Flint Foothills	-	-	1.9	1.9
Collins Access Road	-	-	0.21	0.21
Smart Creek Exploration	0.02	-	-	0.02
Pineau Mine Exploration	0.06	-	-	0.06
Pride Placer Exploration	0.5	-	-	0.5
Pride #4 and #6 Exploration	-	-	0.5	0.5
TOTAL	**5.38**	**0.0**	**30.91**	**36.29**

Examples of Obliterated Temporary Road on Wisdom District – Rat Creek Sale

Figure 1. Temporary Road constructed in 2009 and obliterated in 2010. Shovel is in the former temporary road bed.

Figure 2. Temporary Road constructed in 2009 and obliterated in 2010. Shovel is in the former temporary road bed.

Example of Reclaimed Mineral Exploration Road on Jefferson District

Figure 3. New Road Construction Reclaimed August 17, 2006.

Figure 4. The same road almost 2 years later (June 17, 2008).

2009 Forest Plan Corrected FEIS Key Issues

The 2009 Forest Plan replaced management direction in the 1986 Beaverhead Forest Plan and 1987 Deerlodge Forest Plan[9]. The Corrected FEIS (pgs. 3 - 4) identified a need to revise management direction for eight primary topics which were developed into eight key issues (Corrected FEIS, pg. 14-18). The 2009 ROD approved the Forest Plan (a modified version of Corrected FEIS Alternative 6) and disclosed decision rationale for the eight revision topics (ROD, pgs. 8-22).

To comply with the Court Order directing the Forest Service to "…explain or support, if possible, its decision to exclude temporary roads from the road density objectives", this SEIS discloses the effect of not including temporary roads in OMRTD goals on the eight Forest Plan Corrected FEIS key issues (aquatic resource management, fire management, recreation and travel management, suitable rangeland, suitable timberland, vegetation management, wilderness recommendations and wildlife management). Each key issue follows in alphabetical order and includes a description of the key issue from the Forest Plan Corrected FEIS and references pages disclosing the effects of temporary roads and Forest Plan direction.

Aquatics Resource Management

Key Issue Description (Corrected FEIS, pg. 15)

"Aquatic Restoration: Forest Service data and public concern support the need for watershed improvement. Restoration of all watersheds identified as needing restoration is not feasible over the next 15 years, given projected budgets; therefore we need to prioritize watersheds for treatment."

> **The issue:** How much and where should we focus watershed restoration?
>
> **Decision criteria:** Number of restoration emphasis key watersheds.

Bull Trout and Westslope Cutthroat Trout Conservation: Public concerns, Forest Service direction, and fisheries data support the need to conserve native species to ensure that the strongholds of westslope cutthroat trout and bull trout populations are secure on the BDNF.

> **The issue:** How and where should we focus conservation of bull trout and westslope cutthroat trout?
>
> **Decision criteria:** Number of fish conservation key watersheds.

Aquatic Strategies: Administrative consolidation of the Beaverhead and Deerlodge National Forests in 1996 resulted in 3 separate sets of aquatic habitat direction. The Inland Native Fish Strategy (INFISH), an amendment to the Deerlodge Forest Plan in 1995, applies west of the Continental Divide because of the range of bull trout. The Deerlodge Forest Plan standards apply east of the Divide and the Beaverhead Forest Plan applies on the entire Beaverhead portion. We seek to consolidate all three sets of direction into a comprehensive strategy for the entire Forest.

> **The issue:** What aquatic strategy or strategies are best for managing aquatic species and water quality across the Forest?
>
> **Decision criteria:** Type(s) of aquatic strategies" (Corrected FEIS, pg. 15).

The effects of roads to aquatic resources are disclosed on Corrected FEIS pages 120, 137, 138 and 161. Specific to the construction of temporary roads, the Corrected FEIS explains "Compliance with forest plan standards including watershed conservation practices and improved road designs should minimize problems with new or reconstructed roads…. Relative to the existing road network, the effects of proposed road construction under the various alternatives are minimal, because impacts are dominated by

[9] The Beaverhead and Deerlodge National Forests were administratively combined in 1996.

the existing BDNF transportation system and are expected to influence aquatic resources more than road construction over the planning period" (Corrected FEIS, pg. 138).

Forest Plan Direction for Aquatic Resources

The Forest Plan incorporates INFISH direction for all watersheds on the BDNF and identifies 15 restoration watersheds and 56 fish conservation key watersheds (ROD, pg. 12-13 and Forest Plan, pg. 58).

Forest Plan Aquatics Resource Management Direction applicable to temporary road construction and use follows.

Aquatic Resource Goals (Forest Plan, pg. 15-16)

Mining Facilities: Structures, support facilities and roads are located outside RCAs.[10]

Roads: Roads are designed, constructed, and maintained to meet desired stream function and avoid adverse effects to native fish and sensitive aquatic species.

Stream Crossings: Culverts, bridges, and other stream crossings can accommodate a 100-year flood, including associated bedload and debris.

Aquatic Resource Objectives (Forest Plan, pg. 17)

Roads: Close and stabilize or obliterate and stabilize roads not needed for future management activities.

Aquatic Resource Standards (Forest Plan, pg. 20)

Standard 18: "…Where no alternative to road construction exists, roads are kept to the minimum necessary for the approved mineral activity. Roads no longer required for mineral or land management activities are closed, revegetated, or obliterated."

Standard 21: Provide and maintain fish passage at new, replacement, and reconstructed road crossings of existing and potential fish bearing streams, unless barriers are determined beneficial for native fish and/or sensitive aquatic species conservation.

Standard 22: Complete watershed analysis prior to constructing roads or landings in RCAs within fish or restoration key watershed.

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for aquatic resource management described above?

OMRTD goals do not influence the number of restoration and fish conservation key watersheds prioritized for watershed restoration in the Forest Plan (pg. 58).

Temporary roads constructed since 2009 have complied with the Forest Plan Aquatic Resource Management goals, objectives and standards identified above. Monitoring of completed timber sales indicates compliance with standards minimized effects from new roads to the aquatic resource (2008 Forest Plan Monitoring Report, pg. 47, 2006 Forest Plan Monitoring Report, pg. 39 and 2005 Forest Plan Monitoring Report, pg. 96). Since 2009, temporary roads no longer needed for land management activities have been closed, revegetated and/or obliterated. Site-specific project level analysis has included road design, location and soil and water conservation practices appropriate for the specific

[10] RCA = Riparian Conservation Area, as established by the Inland Native Fish Strategy, are portions of watersheds where riparian-dependent resources receive primary emphasis and management activities are subject to specific standards and guidelines (Forest Plan, pg. 300).

project and land attributes of the project location. Site-specific analysis and design of individual projects is the appropriate planning level to avoid or mitigate the effects of temporary road construction and use.

Fire Management

Key Issue Description (Corrected FEIS, pg. 17)

"The 2001 Federal Wildland Management Policy directs federal agencies to first and foremost protect firefighters, as well as directing the full range of fire management activities to achieve ecosystem sustainability. Response to wildland fires is based on ecological, social and legal consequences of the fire. The circumstances under which a fire occurs and the likely consequences in terms of firefighter and public safety and welfare, natural and cultural resources, and values to be protected, dictates the appropriate response to the fire."

> **The issue:** Where and on how much of the BDNF should wildland fire use be allowed as part of AMR[11]?
>
> **Decision criteria:** Acres available for wildland fire use as part of AMR" (Corrected FEIS, pg. 17).

The effects of roads to fire management are disclosed in the Forest Plan Corrected FEIS pages 248, 250, and 252.

Forest Plan Direction for Fire Management

The Forest Plan allows for the full range of suppression responses to unplanned fire to protect values at risk and restore natural processes where appropriate. Prescribed fire is allowed forestwide and may play a number of roles, including fuels reduction and the restoration of early seral stage vegetation such as aspen and shrublands/grasslands (ROD, pg. 16).

To address the Corrected FEIS key issue for fire management, Forest Plan Fire Standard 2 determines wildland fire use is an available tool for all unplanned ignitions. Forest Plan Fire Management Direction does not specifically apply to temporary road construction and use (Forest Plan, pg. 22).

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for fire management described above?

OMRTD goals do not influence the acres of the BDNF available for wildland fire use as part of the Appropriate Management Response.

Since 2009, no temporary roads have been constructed to support wildland fire use activities, and none are expected in the future. In addition, no temporary roads have been constructed since 2009 for fire suppression activities. In some instances, repetitive wheeled cross-country travel by fire suppression vehicles have created a visible motor vehicle route (track), however, all such routes have been physically blocked from motorized use and appropriately rehabilitated following fire suppression.

Recreation and Travel Management

Key Issue Description (Corrected FEIS, pg. 16)

"Some public comments indicated a desire to maintain existing motorized recreation opportunities in summer and winter while others wanted to expand quiet areas for motorized use with easy vehicle access and parking. Yet others wanted increased motorized opportunities.

[11] AMR = Appropriate Management Response is any specific action taken in response to a wildland fire suitable to meet protection or resource objectives described in fire or land management plans (Forest Plan, pg. 282).

Recreation activities are important to local lifestyles and economies. ATV and snowmobile use grew rapidly since completion of the 1986 and 1987 Plans. Other types of recreation have also increased. We receive more than 1.1 million visits each year, and expect continued growth of at least 10 to 15% percent [sic] over the life of the plan."

Summer issue: Where and how many acres are allocated and managed for summer motorized and non-motorized opportunities?

Decision criteria: Percent of the Forest and location of areas allocated as non-motorized and miles of roads and trails currently open to motorized use closed.

Winter issue: Where and how many acres are allocated and managed for winter motorized and non-motorized opportunities?

Decision criteria: Percent of the Forest and location of areas allocated as non-motorized.

Until the 2001 Off-Highway Vehicle Record of Decision and Plan Amendment for Montana, North Dakota and Portion of South Dakota (Tri-State OHV Decision), National Forest System lands were not closed to off road or trail use, and cross country travel was allowed. Prior to the OHV amendment the public had been allowed to drive wherever they wanted to go for the most part; limited by terrain, technology, and limited site-specific closures. This resulted in user conflict and resource damage.

Both forest staff and members of the public identified a concern with the existing forest plan, as amended by the Tri-State OHV Decision, which restricted cross-country travel by motorized wheeled vehicles. Under this decision a visual determination made by the user determines the open or closed status of a route rather than an inventory designating existing roads and trails. Monitoring and public comments indicate visual determinations contribute to the creation of new roads or trails (user created routes). This situation is created when someone travels cross-country illegally, the first time. The next person sees the track and may be unaware the origin of the road or trail was created illegally. In these cases, the track is visible on the ground and meets the current definition of a road or trail. Repeated use results in a defined track on the ground. The problem is further compounded as Forest Service budgets for site-specific travel planning required by the OHV amendment dwindle. Until routes are inventoried, analyzed and designated, new routes will continue to appear. A map, inventory, or other instrument that identifies road and trail locations as of 2001 is the most cost efficient way to achieve the OHV amendment objective. This would also bring the BDNF into compliance with the National OHV Policy currently published in the Federal Register for public comment.

The issue*:* In order to better to [sic] define unauthorized cross-country travel, where and how many miles of roads and trails are located on the forest?

Decision criteria: Location and miles of roads on the forest.

Location and miles of trails on the forest.

Method used to determine what is a road or trail" (Corrected FEIS, pg. 16).

Forest Plan Direction for Recreation and Travel Management

The Forest Plan provides a mix of recreation access opportunities. During the summer, 55% of the BDNF is available to motorized recreation activities. During the winter, 60% of the BDNF is available to motorized recreation activities (ROD, pg. 15). Forest Plan Recreation and Travel Management Standard 3 (Forest Plan, pg. 33) restricts year-round, wheeled motorized travel to designated routes or areas. Where routes have not been designated through site-specific travel planning, motorized vehicles are restricted to open motorized routes identified on the Forest Plan Interim Roads and Trails Inventory GIS Layer (Forest Plan, pg. 53).

Forest Plan Recreation and Travel Management Direction applicable to temporary road construction and use follow.

Recreation and Travel Management Standards (Forest Plan, pg. 32)

Standard 12: Road construction is not permitted in recommended Wilderness.

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for recreation and travel management described above?

OMRTD goals do not influence the location and amount of acres allocated for summer and winter motorized and non-motorized recreation opportunities on the BDNF.

Since 2009, 338 miles of previously motorized roads and trails on the BDNF have been closed to that use. Temporary roads constructed for resource extraction (see Table 1) since 2009 were closed (or are proposed to be closed) to public motorized use.

Suitable Rangeland

Key Issue Description (Corrected FEIS, pg. 17)

"Regulations require (CFR 219.20) the identification of suitable rangeland in forest plan revision. The BDNF contains 938,000 acres of land capable for livestock grazing. The 1986 and 1987 plans allocated 846,000 acres suitable for livestock."

The issue*:* How much capable rangeland will be allocated as suitable for livestock grazing?

Decision criteria: Acres of suitable rangeland" (Corrected FEIS, pg. 17).

The Corrected FEIS (pg. 310) discloses that existing roads and trails open to motorized travel are generally adequate for livestock management needs.

Forest Plan Direction for Livestock Grazing

The Forest Plan identifies approximately 802,000 acres of the BDNF as suitable for livestock grazing (ROD, pg. 17). Forest Plan Livestock Grazing Direction does not specifically apply to temporary road construction and use (Forest Plan, pgs. 25-27).

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for suitable rangeland described above?

OMRTD goals do not influence the acres of the BDNF suitable for livestock grazing. Since 2009, no temporary roads have been constructed to support livestock grazing activities, and none are expected in the future.

Suitable Timberland

Key Issue Description (Corrected FEIS, pg. 17)

"Regulations require (36 CFR 219.14) the identification of lands suitable for timber production in forest plan revision. Public comments asked for various levels of more and less timber harvest. The BDNF contains 1,513,000 acres of lands tentatively suitable for timber production. The 1986 and 1987 plans allocated 676,000 suitable acres.

This issue includes those lands suitable for timber production as well as lands where timber harvest is allowed to achieve other resource objectives."

The issue*:* How much of the land tentatively suitable for timber production should be allocated for timber production?

Decision criteria: Acres of lands suitable for timber production.

Timber harvest can be a useful tool outside of suitable timberlands to protect resource values and to meet resource objectives such as reduction of fire risk through fuel treatments, vegetation objectives, aspen restoration, conifer encroachment, wildlife habitat and salvage objectives established by a forest plan. The volume produced from these lands would be incidental to other management objectives and not included in the ASQ[12]. However, this volume would contribute to the forest timber sale program.

The issue: How much of the forested lands allow timber harvest to accomplish resource objectives?

Decision criteria: Acres of land where timber harvest is allowed" (Corrected FEIS, pg. 17).

The Corrected FEIS (pg. 448) discloses that open road density objectives for wildlife habitat management "…do not affect temporary vehicle access for logging or permanent roads if they remain closed to motorized recreation."

Forest Plan Direction for Suitable Timberland

The Forest Plan identifies 284,000 acres as suitable for timber production and establishes an ASQ of 140 million board feet per decade. The Forest Plan also identifies an additional 1.6 million acres as available for timber harvest for other resource objectives. Not all areas available for timber harvest may be accessible by roads. Road access is dependent upon the terrain and other management direction such as aquatic protections and motorized or non-motorized allocations. Of the 1.6 million acres, approximately 900,000 acres are inventoried as roadless (ROD, pg. 19).

The Timber Harvest Classification Protocol described in Forest Plan Timber Management Standard 6 establishes where timber harvest is not allowed and where timber harvest is permitted to meet other resource objectives (Forest Plan, pgs. 39-42 & 60). For lands suitable for timber production, Forest Plan Timber Management Objectives are:

Bring 10% of lands suitable for timber production into a managed condition
Manage those stands already in a managed condition to maintain long term sustained yield.

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for suitable timberland described above?

OMRTD goals do not influence the acres of the BDNF suitable for timber production or the acres of forested lands where timber harvest to accomplish resource objectives is allowed.

As previously described in the ROD, not all areas available for timber harvest are accessible by existing roads. Vehicle access to general areas for regeneration and/or salvage timber harvest is primarily provided by the existing, permanent road system. However, vehicle access to individual units during actual harvest and removal of timber may be provided by temporary roads. As a result, temporary roads are necessary to achieve Forest Plan Objectives for suitable timber lands on the BDNF.

While consulting with the US Fish and Wildlife Service in 2013, existing levels of access management and Forest Plan desired OMRTDs served as the first surrogate measure of incidental take for access management. The Forest estimated approximately 70 miles of temporary roads may be constructed across the 3.38 million acre action area during the life of the revised forest plan (see "Endangered Species Act Consultation", below).

[12] ASQ = Allowable Sale Quantity on a National Forest is the maximum quantity of timber that may be sold from the area of suitable land covered by the Forest Plan for a specified time period specified by the plan (Forest Plan, pg. 281).

The only temporary roads constructed for timber harvest on the BDNF since the 2009 Forest Plan decision are associated with the Rat Creek Timber Sale (see Table 1 and Figures 1-2). These roads were not open to public motorized use. They were constructed by the timber sale operator during sale activity in 2009 and obliterated in 2010.

Table 1 also discloses reasonably foreseeable temporary roads that may be constructed for timber harvest.

Vegetation Management

Key Issue Description (Corrected FEIS, pg. 14)

"Forest Stand Structure: Historic models of forest types in southwest Montana show more small trees in younger stands than are found today… Maintenance of size class diversity is a coarse filter approach to providing the habitat composition, distribution and structure that meets the needs of animal and plant species populations that have historically been present in these forests.

> **The issue:** How much vegetation management is needed in the next 10 to 15 years to achieve a balance of size classes closer to historic trends?
>
> **Decision criteria:** Percentage of forested types in early, mid, and later seral stages

Aspen: Analysis indicates aspen stands are declining. Although this is attributed to a variety of causes, conifer encroachment and cropping of regenerating aspen sprouts by herbivores are two of the larger concerns. Modeled historic aspen populations compared to the existing condition, indicate aspen have dwindled to less than 20% of the minimum Historic Range of Variability (HRV).

> **The issue:** How much vegetation management is needed in the next 10 to 15 years to establish an upward trend for aspen?
>
> **Decision criteria:** Acres of restored aspen.

Grassland/Shrubland: Analysis indicates conifer encroachment is reducing grassland/shrubland habitat. Public scoping also identified encroachment as a concern for a variety of reasons such as habitat loss and water production.

> **The issue:** How much vegetation management in grassland/shrublands is needed in the next 10 to 15 years to reduce conifer encroachment?
>
> **Decision criteria:** Acres of grassland/shrubland restored by reducing conifer encroachment.

Old-Growth: Old-growth is a unique component of a diverse vegetative community. It provides important habitat in addition to social and aesthetic values as identified by a variety of people during scoping.

> **The issue:** What minimum amounts of old-growth should be maintained, by forested type?
>
> **Decision criteria:** Percentage of forest type maintained in old-growth condition" (Corrected FEIS, pg. 14).

The effects of roads to vegetation include road corridors that lead to incursion of invasive plant species and are disclosed on page 479 of the Corrected FEIS.

Forest Plan Direction for Vegetation Management

Forest Plan goals, objectives and standards for vegetation are designed to maintain or restore the integrity, resiliency and sustainability of ecosystems. Forest Plan objectives include increasing smaller size classes and earlier seral stage ecosystem components for Douglas-fir and lodgepole pine by regenerating and/or salvaging forest that are dead or dying, where needed to reduce the risk of wildfire or where needed to meet the objective on suitable timber lands, favoring the aspen component in areas where lodgepole pine is regenerated and regenerating whitebark pine, largely through the use of fire. This restoration of vegetation composition, structure and function is expected to enhance the resiliency and sustainability of

ecosystems and thereby expand options for managing the BDNF in response to environmental stressors including climate change (ROD, pg. 9-10).

To address the Corrected FEIS key issue for vegetation, Forest Plan Vegetation Objectives prescribe:

- increasing the number of acres in the 0 to 5 inch DBH[13] class on approximately 20,000 acres for Douglas-fir and 74,000 acres for lodgepole pine
- increasing the aspen component within lodgepole pine and other vegetation types on 67,000 acres
- promoting regeneration of whitebark pine on approximately 45,000 acres and,
- reducing conifer encroachment on 74,000 acres of riparian areas, shrublands and grasslands (Forest Plan pgs. 43-44).

The Forest Plan did not establish a minimum amount of old-growth; rather Vegetation Standard 1 requires mechanical vegetation treatments and prescribed fire in old growth stands not reduce the age and number of large trees and basal area below the 'minimum criteria' required for Eastern Montana old growth in Green et al. (Forest Plan, pg. 44).

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for vegetation management described above?

Mechanical vegetation treatment, in the form of commercial timber harvest, is frequently used to increase the number of acres in the 0 to 5 inch DBH class for Douglas-fir and lodgepole pine. Vehicle access to general areas for regeneration and/or salvage harvest is primarily provided by the existing, permanent road system. However, vehicle access to individual units during actual harvest and removal of timber may be provided by temporary roads. The use of temporary roads to access individual units with mechanical equipment is a necessary tool to achieve the vegetation objective for smaller size class and early seral stage Douglas-fir and lodgepole pine. As a result, temporary roads are necessary to achieve Forest Plan Objectives for these vegetation types on the BDNF.

The only temporary roads constructed for timber harvest on the BDNF since the 2009 Forest Plan decision are associated with the Rat Creek Timber Sale (see Table 1 and Figures 1-2). These roads were not open to motorized use by the recreating public. They were constructed by the timber sale operator during sale activity in 2009 and obliterated in 2010.

Table 1 also discloses reasonably foreseeable temporary roads that may be constructed for vegetation management.

A review of scientific literature published since 2009 addressing potential effects of climate change further validates the Corrected FEIS analysis of the need to maintain or restore the integrity, resiliency and sustainability of ecosystems.

Wilderness Recommendations

Key Issue Description (Corrected FEIS, pg. 18)

"Planning regulations (36 CFR 219.17(a)) requires all roadless areas be identified, inventoried, evaluated and considered as potential wilderness if appropriate. Public comments included requests for both more and less recommended wilderness.

The issue: Where and how much land should be recommended for wilderness?

Decision criteria: Location and acres recommended for wilderness" (Corrected FEIS, pg. 18).

[13] DBH = Diameter at Breast Height

Corrected FEIS Appendix C evaluates and updates the inventory or areas with wilderness potential on the BDNF.

Forest Plan Direction for Recommended Wilderness Areas

The Forest Plan recommends 322,000 acres of roadless areas for addition to the National Wilderness Preservation System (ROD, pg. 20). Recommended wilderness areas are mapped on Forest Plan page 56. Forest Plan Recreation and Travel Management Standard 12 prohibits road construction in recommended wilderness (Forest Plan, pg. 32).

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for wilderness recommendations described above?

OMRTD goals do not influence the acres of the BDNF recommended for wilderness. Roads will not be constructed in recommended wilderness areas.

Wildlife Management

Key Issue Description (Corrected FEIS, pg. 15)

"Wildlife Security: Public comment on the proposed action, indicated concern about the effects of open motorized roads and trails on wildlife habitat and connectivity."

> **The issue:** What open motorized road/trail densities are appropriate for wildlife security during the summer season?
>
> **Decision criteria:** Miles per square mile of open motorized roads/trails during the summer season.

Elk Habitat Effectiveness: Members of the public expressed concern about elk security, particularly during big game hunting season. Montana Fish Wildlife and Park expressed concern regarding their ability to maintain big game hunting season objectives.

> **The issue:** What open motorized road/trails densities are appropriate to provide security and escapement for elk during the general rifle season while allowing for a variety of hunting experiences across forest?
>
> **Decision criteria:** Miles per square mile of open motorized road/trail during the general rifle hunting season" (Corrected FEIS, pg. 15).

Analysis of impacts from implementing the Forest Plan to wildlife habitat is disclosed in the Corrected FEIS at pages 485-536, 1054-1061 and Appendix B.

Forest Plan Direction for Wildlife Habitat

The Forest Plan addresses the issue of habitat security, connectivity and linkage with a variety of year-round and seasonal area allocations for motorized and non-motorized use. 2009 Forest Plan goals generally provide more habitat security than the 1986 and 1987 Forest Plans because they apply to both motorized roads and trails. During the hunting season, the goals are applied at the hunting unit scale and allow coordination with Montana Fish, Wildlife and Parks (MFWP) big game harvest objectives and maintenance of secure habitat. The Forest Plan allows for more proactive management based on new information by updating the definition of secure habitat and employing best available science to assess the response of elk and other big game to the threat of motorized disturbance (ROD, pg. 11).

Cover and forage for animals is provided by a mosaic of species and age classes of native trees, shrubs, grasses and forbs. Vegetation goals, objectives and standards provide the basis for maintaining or restoring ecological communities of sufficient resiliency to provide for the viability of wildlife species

that occur on or make use of forested types on the BDNF. Forest Plan goals, objectives and standards provide for greater habitat diversity and a more sustainable ecosystem as we look toward the future (ROD, pg. 11-12).

Forest Plan Wildlife Habitat Direction applicable to temporary road construction and use follows.

Wildlife Habitat Goals *(Forest Plan, pgs. 45-47)*

Wildlife Secure Areas and Connectivity: Secure areas[14] and connectivity for ungulates and large carnivores are provided, while recognizing the variety of recreational opportunities.

Wildlife Security: Manage density of open motorized roads and trails by landscape year-round, except fall rifle big game season, to achieve levels at or below the following (Scale – Landscapes):

Landscape	Desired Open Motorized Road and Trail Density Miles per Sq. Mile*
Big Hole	1.2
Boulder River	1.9
Clark Fork – Flints	1.9
Gravelly	0.7
Jefferson River	1.6
Lima Tendoy	1.0
Madison	0.0
Pioneer	1.5
Tobacco Roots	1.3
Upper Clark Fork	2.0
Upper Rock Creek	0.9

** This includes roads available for permitted or administrative use.*

Elk Security: Elk security is managed to provide quality elk habitat, provide a variety of recreational hunting opportunities, and provide support for Montana's fair chase emphasis.

Manage open motorized road and trail density by MTFWP hunting units as of 2006 – on National Forest lands during the fall rifle big game season, to achieve levels at or below the following (Scale – Hunting Unit):

Hunting Unit	Desired Fall Open Motorized Road and Trail Density Miles per Sq. Mile*
210	0.9
211	0.5
212	1.4
213	1.4
214	1.6
215	1.5
216	0.8
300	0.6
302	1.0
311	0.0
318	1.8
319	0.6
320	0.8
321	1.1
323	0.5
324	0.4

[14] Secure areas are areas larger than 10 acres that are 1/3 of a mile from a route open to motorized vehicles (Forest Plan, pg. 302).

Hunting Unit	Desired Fall Open Motorized Road and Trail Density Miles per Sq. Mile*
327	0.8
328	0.8
329	1.1
330	0.7
331	1.5
332	0.8
333	0.9
340	1.4
341	0.5
350	1.3
360	0.0
362	0.0
370	1.0

** This includes roads available for permitted or administrative use.*

Wildlife Habitat Objectives (Forest Plan, pg. 47)

Road and Trail Densities by Hunting Unit: From October 15 to December 1, reduce the open motorized road and trail densities in hunting units 215 to 1.5, 300 to 0.6; 302 to 1.0; 318 to 1.8; 333 to 0.9; 341 to 0.5; and 350 to 1.3 miles per square mile or less.

Road and Trail Densities by Landscape: Reduce the open motorized road and trail densities from May 16 to December 1 in the Boulder River Landscape to 1.9 and Jefferson River Landscape to 1.6 miles per square mile or less.

Wildlife Habitat Standards (Forest Plan, pg. 48)

Standard 1: From October 15 to December 1 Hunting Units that exceed the open motorized road and trail density objective will have no net increase in designated open motorized road and trail mileage (Scale – Hunting Units on National Forest Lands).

Standard 2: Landscapes that exceed the open motorized road and trail objective will have no net increase in designated open motorized road and trail mileage (Scale – Landscapes on National Forest System Lands).

Endangered Species Act Consultation

The Yellowstone Distinct Population Segment (DPS) of grizzly bears was de-listed as a threatened species in 2007 and, at the time of the January 2009 ROD, re-classified to the Northern region sensitive species lists (Corrected FEIS, Revised-BE-44 through 51).

Following the re-listing of the Yellowstone DPS, the BDNF initiated consultation for the Forest Plan with U.S. Fish and Wildlife Service (USFWS) in August 2010, focusing on the Yellowstone Grizzly Bear Ecosystem (YGBE)[15]. In an October 4, 2010 Biological Opinion (BO), USFWS "…determined that the Revised Forest Plan, with its incorporated objectives, goals and standards, adequately reduces the potential for and minimizes the effect of any incidental take that may result. Therefore, reasonable and prudent measures, with their implementing terms and conditions, were not provided" (10/4/10 BO, pg. 55).

In July 2012, the BDNF reinitiated consultation with USFWS on the remainder of the BDNF (outside the YGBE) after new information demonstrated grizzly bears from the Northern Continental Divide Ecosystem (NCDE) and other grizzly bear ecosystems were advancing onto the northern tier of the

[15] The YGBE includes BDNF lands south of Interstate-90 and east of Interstate-15.

BDNF. In a May 28, 2013 BO, USFWS again "…determined that the Revised Forest Plan, with its incorporated objectives, goals and standards, adequately reduces the potential for and minimizes the effect of any incidental take that may result. Therefore, no reasonable and prudent measures are necessary" (5/28/13 BO, pg. 89).

In the 2013 BO, existing levels of access management and Forest Plan desired OMRTDs served as the first surrogate measure of incidental take for access management. In reaching their determination, USFWS considered the OMRTD goals listed on Forest Plan pages 45-47 as addressing permanent motorized roads and trails (BO, pg. 75-80).

For temporary roads, USFWS determined:

> "Temporary roads built for resource extraction such as timber harvest or mining may remain on the landscape for several years and receive a substantive amount of use. The Forest has estimated that approximately 70 miles of temporary roads may be constructed across the 3.3 million acre action area (the entire Forest), over the life of the Revised Forest Plan (15 years). Depending on the site specific information regarding the temporary roads (i.e. length and duration), the Service anticipates that some level of adverse effects to female grizzly bears with home ranges impacted by temporary roads may occur in some situations. We do not expect that all temporary roads would have adverse impacts on female grizzly bears, or that all female grizzly bears would be adversely affected by temporary roads. The level of effects would depend on such things as location of the temporary road (habitat type), length of the temporary road, the frequency and intensity of temporary use, and the duration the temporary road would be on the landscape, in relation to those factors listed above for permanent roads. Not all 70 miles are likely to be constructed at once. Some of the temporary roads would be consolidated in project areas and be constructed and used at the same time, which would concentrate effects on bears into a smaller area. Other temporary roads would be separated by space and time across the Forest, which may affect more individual grizzly bears, but have less intense effects. Temporary roads would not be open to public use and would be obliterated when implementation of a project is completed, which would moderate the impacts on bears. However, if under-use of key feeding and sheltering habitat by female grizzly bears is significant, they may fail to obtain the necessary resources to breed and successfully reproduce. In summary, the existing roads and any new roads constructed in the future…may affect grizzly bears. These affects may be insignificant in some situations or adverse in others" (BO, pg. 45).
>
> "Temporary roads may result in temporary increases in linear road densities within a landscape or hunting unit. The temporary changes do not affect our first surrogate measure of take as temporary roads would not result in a net change to the overall linear road densities post-project. Further, in many cases, temporary roads have different effects on grizzly bears than those associated with permanent roads. Temporary roads are obliterated post-project and linear road densities would return to the pre-project levels, lessening the effects on grizzly bears over time. The Forest has estimated that 70 miles of temporary roads may be constructed across the Forest over the life of the Revised Forest Plan. This level of temporary roading represents our second surrogate measure of incidental take that we anticipate in regards to future temporary road construction. If the Forest constructs more than 70 miles of temporary motorized routes over the life of the Revised Forest Plan, then the level of incidental take we anticipated in our second surrogate measure of take would be exceeded and the level of take exempted would be exceeded" (BO, pg. 80).

After considering permanent and temporary roads on the BDNF, USFWS does not anticipate:

> "…that motorized access management in all landscapes or hunting units would result in incidental take. For example, hunting units 311, 360, and 362 have an open motorized road and trail density of zero. Some additional units have relatively low open motorized road and trail densities. The Boulder River, Jefferson River, Clark Fork-Flints, and Upper Clark Fork Landscapes and corresponding

hunting districts exhibit the highest open motorized road and trail densities. Grizzly bears appear to be reoccupying these areas on the Forest, likely moving south from the NCDE population (U.S. Forest Service 2012). We anticipate that the likelihood of incidental take of females would be highest in these areas over the life of the plan. We also do not anticipate that all temporary roads constructed in the action area would result in incidental take. This would depend on such things as location and length of the temporary road and the duration it would be on the landscape…If miles of temporary roading exceed the amount we describe above as the second surrogate measure of incidental take, then the level of incidental take would be exceeded and therefore the level of take exempted would be exceeded. Under CFR 402.06(1)…reinitiation of consultation would be required" (BO, pgs. 80-81).

SEIS Analysis

What is the effect of not including temporary roads in OMRTD goals on the Forest Plan EIS issue for wildlife management described above?

Potential impacts from open motorized roads and trails come from fragmentation of habitat and displacement of wildlife. The amount of displacement is a function of use on the road or trail, open road density, timing of use and species of wildlife (Corrected FEIS, pg. 508). The Forest Plan addresses wildlife security, connectivity and linkage with a variety of year-round and seasonal management areas for motorized and non-motorized use applied to both motorized roads and trails (ROD, pg. 11). Motorized route density (OMRTD) goals by landscape range from 0 to 2.0 miles per square mile with a median of 1.3 miles per square mile. During the fall big-game rifle season (October 15 through December 1), the Forest Plan provides additional wildlife security, connectivity and linkage by applying additional OMRTDs goals at the hunting unit scale. These OMRTDs range from 0 to 1.8 miles per square mile with a median of 0.8 miles per square mile.

The Forest Plan (pg. 302) defines secure areas as "Areas larger than 10 acres that are 1/3 of a mile from a route open to motorized vehicles." This definition incorporates the 500 meter road buffer identified in the 2006 Yellowstone Grizzly Bear Amendment and the threat response noted for elk in Wisdom, et al (2004). The 1/3 mile modification was developed with recreation managers to accommodate mapping for quiet recreation (Corrected FEIS, pg. 508-509). Consequently, the wider buffer[16] identifies less secure habitat than the 500 meters described in the grizzly bear amendment. These secure areas also provide undisturbed habitat for large ungulates and carnivores (Corrected FEIS, pg. 488).

While habitat needs and susceptibility to conflicts with humans varies among wildlife species, grizzly bears are generally viewed as more susceptible (compared to other wildlife species on the BDNF) due to naturally low populations and large home ranges. As a result, a basic tenet of the Corrected FEIS wildlife analysis posits secure areas for grizzly bears (a documented disturbance adverse species) provides secure areas for wildlife in general and connectivity across the BDNF landscape for large carnivores and ungulates, including elk, deer, and antelope. This tenet is supported by recent documents, including the 2013 MFWP Final Programmatic EIS for the Grizzly Bear Management Plan for Southwestern Montana (pg. 72) which finds successful implementation of MFWP's plan for grizzly bear has secondary impacts on other wildlife "…road density standards as recommended have been in place for years and have allowed for expansion of the bear population while maintaining secure elk habitat."

Forest-wide summer secure habitat is 52% at the landscape scale (Corrected FEIS, pg. 509). Secure areas are distributed across all BDNF landscapes (Corrected FEIS, pg. 524) and range from 10 to 220,848 acre contiguous blocks with an average size of 3,022 acres. The Forest Plan maintains and manages these secure areas through the previously described wildlife-related goals, objectives and standards for OMRTDs at the landscape level.

[16] 1/3 mile is approximately 120 feet wider than 500 meters.

General hunting season in the fall poses the greatest potential human disturbance adversely affecting connectivity and secure areas forest-wide. There is a pulse of dispersed recreation activity related to deer/elk hunting unmatched at any other time of the year. Southwestern Montana receives approximately 45% of the elk hunting pressure in the State, with the bulk of it focused on hunting districts on the BDNF (Corrected FEIS, pg. 516-517). The Forest Plan contains additional OMRTD goals, based on hunting units, during the general big-game hunting season. Forest-wide, secure habitat increases to 59% of the BDNF during the fall big-game hunting season. From October 15 to December 1, secure areas range from 10 to 308,267 acres contiguous blocks with an average size of 4,083 acres. The Forest Plan maintains and manages these fall secure areas through OMRTDs at the hunting unit scale.

A review of scientific literature and MFWP elk population objectives and data published since 2009 further validates the value of managing wildlife security by managing public motorized use of roads and trails.

The Forest Plan defines temporary roads as "A road or trail necessary for emergency operations or authorized by contract, permit, lease, or other written authorization that is not a forest road or trail and that is not included in a forest transportation atlas (36 CFR 212.1)." Unfortunately, this term is confusing when applied to Forest Plan OMRTD goals designed to manage wildlife secure areas over large areas (landscapes and hunting districts) during the planning period (at least 10-15 years) because some temporary roads (using the above definition) are expected to remain on the landscape and in use for the reasonably foreseeable future and some are not.

Permitted and administrative use roads may be considered temporary if they are closed to public motorized use but are expected to remain on the landscape and in motorized use status for a specific permitted purpose in the reasonably foreseeable future. Examples of these include roads closed to public motorized use but open to permit holders for specific reasons such as maintaining electronic communication sites, facilities at developed ski hills, access to private property, etc. Because these roads and trails are expected to remain on the landscape and in use for the reasonably foreseeable future, they are included in OMRTD calculations (see asterisk for Forest Plan Tables 13 and 14, pgs. 45-57) even if they meet the above regulatory definition for temporary roads.

Conversely, some temporary roads and trails are not expected to remain on the landscape for the reasonably foreseeable future. Temporary roads constructed for resource extraction (primarily timber harvest and mineral exploration) are closed to public use and/or obliterated after project completion.

These types of temporary roads displace wildlife during construction and use when they occur in an existing secure area[17]. Adverse impacts to wildlife could result from temporary roads constructed for resource extraction such as timber harvest or mining. The BDNF estimates approximately 70 miles of temporary road for resource extraction may be constructed across the 3.38 million acre BDNF over a 15-year period. The temporary roads constructed for resource extraction would not be open to public use and would be obliterated upon project completion. The BDNF expects impacts from these roads to be similar for all wildlife species, especially large carnivores and ungulates, to those previously described for grizzly bears in the Endangered Species Act Consultation section of this document.

Wildlife displacement from the use and construction of temporary roads is influenced by a number of factors, including the length of road, proximity of the road to the secure area (example: is the road located along the edge of or does it bisect the secure area?), time of year the road is being used, length of time the road is in use, terrain and vegetation. Site-specific analysis and design of individual projects is the

[17] Note: Previously described permitted/administrative roads included in OMRTD calculations are not located in wildlife secure areas.

appropriate planning level to avoid or mitigate the effects of temporary road construction and use of individual secure areas.

To reduce confusion about temporary roads and OMRTD calculations that currently exists, the BDNF proposes to add the following definition to the Forest Plan glossary:

> **OMRTD** is a measurement of motorized routes open to use, measured at the completion of project implementation in miles per square mile. It consists of motorized roads and trails that fall within the external forest boundary and are (1) open to public motorized use, (2) open for permitted and/or administrative use, (3) temporary unless closed and/or obliterated at project completion, and (4) motorized routes on private inholdings.

The Forest Plan Corrected FEIS analyzes alternatives for managing all resources on the 3.38 million acre BDNF for at least 15 years. The selected alternative provides wildlife secure areas by describing long term, desired future OMRTDs. The above definition for OMRTD is expected to maintain and manage existing wildlife secure areas through the previously described wildlife-related goals, objectives and standards, applied to motorized roads and trails, at the landscape and hunting unit level for the life of the Forest Plan. This definition would eliminate the confusion associated with the application of the definition of temporary roads from Forest Service Manual 7700. At the same time, it would allow a conservative approach to wildlife habitat management because it would include any motorized roads or trails located on private inholdings within the external Forest boundary.

Temporary roads (as displayed in Table 1 and Figures 1-4) that are in motorized use only during project implementation and then obliterated, potentially displace wildlife from secure areas only when located in a secure area and have differing effects on wildlife based on site-specific terrain and other features. The short term effects of temporary roads are appropriately analyzed at the project-specific planning level rather than the much larger area and time scale of the Forest Plan.

Summary

In summary, what is the effect of not including temporary roads in Open Motorized Road and Trail Density (OMRTD) goals on Forest Plan EIS Issues?

> **Aquatics Resource Management:** OMRTD goals do not influence the number of restoration and fish conservation key watershed prioritized for watershed restoration in the Forest Plan. Site-specific analysis and design of individual projects is the appropriate planning level to avoid or mitigate the effects of temporary road construction and use on aquatic resources.
>
> **Fire Management:** OMRTD goals do not influence the acres of the BDNF available for wildland fire use as part of the Appropriate Management Response.
>
> **Recreation and Travel Management:** OMRTD goals do not influence the location and amount of acres allocated for summer and winter motorized and non-motorized recreation opportunities on the BDNF.
>
> **Suitable Rangeland:** OMRTD goals do not influence the acres of the BDNF suitable for livestock grazing.
>
> **Suitable Timberland:** OMRTD goals do not influence the acres of the BDNF suitable for timber production or the acres of forested lands where timber harvest to accomplish resource objectives is allowed. However, temporary roads are necessary to achieve the Forest Plan Objectives for suitable timber lands on the BDNF.
>
> **Vegetation Management:** OMRTD goals do not influence goals, objectives and standards for vegetation designed to maintain or restore the integrity, resiliency and sustainability of ecosystems.

However, temporary roads are necessary to achieve Forest Plan Objectives for smaller size class and early seral stage Douglas-fire and lodgepole pine on the BDNF. These objectives provide the basis for maintaining or restoring ecological communities of sufficient resiliency to provide for the viability of wildlife species that occur or make use of forested types on the BDNF.

Wilderness Recommendations: OMRTD goals do not influence the acres of the BDNF recommended for wilderness. Roads will not be constructed in recommended wilderness areas.

Wildlife Management: OMRTD goals, applied to both motorized roads and trails, address the issue of habitat security, connectivity and linkage. Goals applied at the hunting unit scale allow coordination with MFWP big game harvest objectives and maintenance of secure habitat. These goals address the long term desired condition of secure habitat across the entire 3.38 million acre BDNF for at least 15 years. A proposed addition of a definition for OMRTD to the Forest Plan glossary clarifies that temporary roads are not included in OMRTD calculations if they are closed to public motorized use and obliterated at project completion. Potential, short-term wildlife displacement from the use and construction of this type of temporary road is influenced by a number of factors appropriately analyzed at the project- specific planning level rather than the much larger area and time scale of the Forest Plan.

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