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FS-Memorandum **EMS TRANSMISSION**
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Subject: Road Density Analysis Team Final Report

To: **USDA Forest Service Forest Supervisors:** Colville, Deschutes, Fremont, Malheur, Ochoco, Okanogan, Umatilla, Winema, Wallowa-Whitman, Wenatchee, Salmon/Challis, Sawtooth, Boise, Nez Perce, Clearwater, Idaho Panhandle, Kootenai, Flathead, Bitterroot, Lolo, Helena, Payette, Humboldt-Toiyabe, Targhee-Caribou, Beaverhead/Deerlodge, and Bridger-Teton National Forests

USDI Bureau of Land Management District Managers: Idaho: Upper Columbia/Salmon/Clearwater, Lower Snake River, Upper Snake River; Oregon/Washington: Burns, Prineville, Spokane, and Vale; Montana: Missoula Field Office

The Biological Opinions on Land and Resource Management Plans (LRMPs) for Forest Service (FS) and Bureau of Land Management (BLM) units within the Snake and Upper Columbia River Basins (CRB), for bull trout, require that the federal land management agencies develop an assessment of road construction and management, including identification of unroaded and low road density areas and their value to bull trout (Term and Condition #5). The 1998 Salmon and Steelhead Biological Opinion covering LRMPs within the Upper Columbia Basin and Snake River Basin Evolutionarily Significant Units requires a similar analysis (Appendix 2, Mechanism 3).

The Road Density Analysis Team (RDAT) accomplished this task in accordance with the December 11, 1998, Charter for Implementing Biological Opinions through an Interagency Implementation Team (IIT). The RDAT completed a coarse-scale analysis using existing information and further described the relative value of low road density areas within each subbasin for salmon, steelhead, and bull trout within the Upper Columbia and Snake River basins.

The attached, final report Land Management Recommendations Related to the Value of Low Road Density Areas in the Conservation of Listed Salmon, Steelhead, and Bull Trout (RDAT report) describes the results of this coarse-scale low road density analysis. The Road Density Class "*Undesignated Low Road Density*" (pg. 15) represents important areas for both short and long-term conservation and recovery of listed fish species. These areas should be considered a critical component in any locally developed conservation strategy for listed fish species within the Interior Columbia basin.

The 1998 Salmon/Steelhead (Mechanism 3c) and Bull trout (5c) Biological Opinions directed that the RDAT review this information and make recommendations regarding the need for additional habitat protection to senior level managers. The six RDAT recommendations adopted by the Regional Executives (RDAT Report, Executive Summary, p.6) are discussed below:

- RDAT Recommendation (1): The IIT should solicit a peer review of this analysis, along with coordination and review of this report with any National teams addressing roads and roadless areas, to ensure the approach, technical processes, and conclusions are reasonable.

  Regional Executive Decision: Peer review and coordination with appropriate National teams was completed. The final RDAT report incorporates these comments and recommendations.

- RDAT Recommendation (2): Assess the need for an update of this analysis every 3-5 years when there are significant updates in broad-scale information.

  Regional Executive Decision: If significant new information becomes available regarding road densities or listed fish we will assess whether the RDAT report should be updated, or whether the new information would better be addressed through other ongoing analysis or planning processes.

- RDAT Recommendation (3): After IIT acceptance of this analysis, a condensed version of this report should be prepared and distributed to field units in the analysis area.

  Regional Executive Decision: We believe that condensing the document would reduce its value, and have chosen not to do so. This letter transmits the report to the field, as recommended by the RDAT and IIT.

- RDAT Recommendation (4): The Regional Executives provide direction to the field units that allow for road construction in undesignated low road density areas only after completion of the mid/fine scale analysis of these areas.

  Regional Executive Decision: While we agree that avoiding road construction in low road density areas with high to very high fish values may be desirable, we also recognize that providing direction precluding such development could conflict in some instances with our legal obligations under laws such as the Alaska National Interest Lands Conservation Act (ANILCA) and the 1872 Mining Laws. Rather than totally precluding such development, the BLM State Directors and Regional Foresters, through this transmittal letter, direct field units as follows:

  A. Avoid new road construction in low road density areas to the extent practical, consistent with existing authorities and LRMPs, but keep in mind that in some cases the need to remove hazardous fuels may be paramount for long term watershed restoration,
  B. Decisions to allow new road construction in low road density areas should not be made without an assessment of environmental effects, including any changes to the value of the low road density area as a current or potential stronghold for listed aquatic species. This assessment and/or analysis should also consider the amount of acreage within the watershed already in Wilderness and inventoried roadless areas, and

C. Where new road development in low road density areas cannot be avoided, road location and design should minimize effects to aquatic resources and incorporate practical mitigation measures, including closure or decommissioning of the road if the need for the road is temporary.

- RDAT Recommendation (6):

  (5) The IIT commissioned the subbasin assessment team to outline and provide guidance, information, and tools for the field units in the analysis area for completion of the mid/fine scale analysis of individual low road density areas. The opportunity to combine this task with other IIT tasks should be evaluated.
  (6) The field units refine this information on high value low road density areas through Subbasin Assessment and Watershed Analysis and apply it for both LRMP adjustments and the development of aquatic conservation and restoration strategies.

  Regional Executive Decision: The need for another IIT sub-team to develop guidance information, and tools to the field units in the analysis area for completion of the mid/fine scale analysis of individual low road density areas was determined by the IIT to not be warranted at this time. Field Unit participation in the Northwest Power Planning Council's subbasin planning process will provide a forum for refining this coarse-scale analysis with higher resolution, locally derived information.

Questions related to this cover letter or the accompanying RDAT Report should be directed to FS, Columbia River Basin Anadromous Fish Coordinator, ph: 503-808-2929 (the current acting coordinator is Paul Anderson, panderson@fs.fed.us).

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Enclosure: Road Density Analysis Report

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