

Appendix

Appendix A - Maps

Appendix B – BMPs

Appendix B – Best Management Practices

Best Management Practices are the primary mechanisms used to enable the achievements of water quality standards (Environmental Protection Agency 1987). The Environmental Protection Agency has certified the Oregon Forest Practices Act and Washington Forest Practices Rules and Regulations as best management practices. The States of Oregon and Washington compared Forest Service practices with these State practices and concluded that Forest Service practices meet or exceed state requirements.

Every year since 1996, the Umatilla National Forest has monitored a selection of projects for implementation and effectiveness of best management practices. The results of this monitoring have been published in Umatilla National Forest's Forest Plan Monitoring and Evaluation Reports, which were combined with the Wallowa Whitman and Malheur National Forests' reports in 1998 into Monitoring and Evaluation Reports for the National Forests of the Blue Mountains. A substantial record of results exists.

On the West End OHV project the district hydrologist visited streams to determine possible issues regarding water quality and OHVs. This information was used in planning the project.

Documenting best management practices effectiveness still poses challenges, requires longer time frame for monitoring, and integration with instream water quality monitoring programs.

The following Best Management Practices apply to the West End OHV Project. Best Management Practices are not limited to the BMPs listed here. Additional measures may be added if a situation arises.

Road (Trail) System

R-1 General Guidelines for the Location and Design of Roads [or Trails]

- Description - Locate and design roads to minimize resource damage.
- Location - Construction of new OHV trails.
- Effects - Ensures that new trails would be efficiently and effectively designed, and use latest design standards.
- Application – Design elements 1, 2 and 3 would aid in mitigating erosion associated with new trails. Proposed trail locations considered risk to resources before inclusion into alternatives.

R-3 Timing of Construction Activities

- Description - Minimize erosion by constructing trails during minimal runoff periods.
- Location - Construction of new OHV trails.
- Effects - Limits construction to seasons and times when there is a low probability of erosion.
- Application - Engineering specialist will determine when the probability of erosion is low before work can begin.

R-7 Control of Surface Drainage Associated with Roads [or Trails]

- Description - Minimize possible detrimental effects of surface drainage of trail.
- Location – All designated trails.
- Effects - Reduce sedimentation associated with trails.
- Application - Minimize the erosive effects of water concentrated by trail drainage features and disperse runoff using water spreading ditches and drivable dips. Continued monitoring and maintenance would identify and make repairs as needed.

R-18 Maintenance of Roads [or Trails]

- Description - Provide for water quality protection by maintaining trails through the control of waste material placement, keeping drainage facilities open, and by repairing ruts and failures.
- Location - All OHV trails.
- Effects - Detrimental impacts to water quality from trail maintenance activities are reduced.
- Application – Trail maintenance will be incorporated into the OHV Implementation Plan as needed.

Watershed**W-5 Cumulative Watershed Effects**

- Description - Protect the beneficial uses of water from the cumulative effects of past, present, and future management activities that could result in degraded water quality or stream habitat.
- Location - Entire project area.
- Effects - Activities that could result in cumulative damage to water quality are altered or eliminated as appropriate.
- Application - A cumulative watershed effects analysis was conducted for the West End OHV project area and beneficial uses that comply with applicable State requirements for protection of waters have been identified in the Environmental Assessment.

W-7 Water Quality Monitoring

- Description - Determine the effects of the proposed action on the beneficial uses of water, monitor baseline watershed conditions for comparison with State Water Quality and Forest Plan standards and estimate long-term trends, ensure the health and safety of water users, and evaluate BMP effectiveness.
- Location - Entire project area.
- Effects - Monitoring would ensure that mitigation to protect water quality is effective, and, if not, would recommend changes for future activities.
- Application – Design Criteria 3 would ensure applicable mitigations were implemented

and effective.

W-8 Management by Closure to Use (Seasonal, Temporary, and Permanent)

- Description - Exclude activities that could result in damage to either resources or improvements, such as trails, resulting in impaired water quality.
- Location - All OHV trails.
- Effects - Maintain down slope water quality, sustain the current condition of the watershed, and exclude activities that may result in additional resource damage and impair healthy water systems.
- Application - Project Design Criteria 1 - 4 would protect OHV trails and water quality during sensitive periods. Temporary closures would be used as needed (36 CFR 212.52).

Recreation

REC-6 Management of Off-Road Vehicle Use

- Description – to provide a systematic process to aid in determining when and what extent ORV use will cause, or is causing adverse effects on water quality.
- Location – All OHV Trails
- Effects - Detrimental impacts to water quality from OHV use are identified
- Application – Project Design Criteria 1 – 3 and 13 as well as Monitoring and evaluation 1 thru 5. Also see BMPs 5 and 8 below.

5. Protection of water quality and aquatic features as related to OHV activities (Draft BMP Plan, 2005, Practice 4-5)

- Description - To manage OHV activities in order to minimize impacts to water quality and aquatic features.
- Location - OHV traffic near aquatic features, particularly at stream crossings
- Effects – Increase in the amount of: sediment delivered to aquatic features, turbidity levels and suspended sediment concentrations, fine-grained material in depositional areas in streams, or erosion of stream channels at locations where OHV trails cross streams.
- Application – Minimizing impacts from OHV activity would include: design, location, education, monitoring, and maintenance of OHV trails (design elements 1, 2, 3, and 13).

8. Management of Trails (Draft BMP Plan, 2005, Practice: 4-8)

- Description - To minimize or eliminate soil erosion and water quality problems originating from trails.

- Location - All OHV trails
- Effects – Location and design of trails would include erosion control measures
- Application – Project design considered risk to resource damage including erosion and water quality. Trails of high risk were not included in the developed alternatives (see Trails Analysis in the project file). Trail design would include erosion control structures or features as needed.

Appendix C – Road and Trail Analysis

This analysis is limited to the project scale, to designate roads, trails, or areas for OHV use on the west end of the Heppner Ranger District. The West-End OHV project area, identified as the area west of the Sunflower Flat Road (FS Road 22), encompasses a total of about 91,000 acres.

Closed roads designated as Class I and III OHV trails would remain on the transportation system as closed roads. The designation as an OHV trail does not constrain future options to change maintenance level 1 roads to maintenance level 2 roads for resource management nor does this analysis identify roads to be removed from the overall transportation system on the Heppner Ranger District.

This analysis was completed on the maintenance level 1 roads (closed to Highway Legal Vehicles). All maintenance level 1 roads were reviewed by the interdisciplinary team members and decision maker to determine level of resource concerns and the ability to implement, monitor, and enforce as well as the suitability for OHV travel.

Each road or road segment is identified as O = Open, C = Closed, or S = Seasonal for each alternative. Resource or other concerns with designating the road as a motorized trail are identified in the Reason column.

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2000013	0.34	O	C	C	C	C	Wildlife, No destination
2000016	1.08	O	O	C	O	C	
2000017	0.14	O	C	C	C	C	Rimrock decommission
2000018	1.17	O	C	C	C	C	Wildlife Cover
2000100	1.51	O	C	C	C	C	Rimrock decommission
2000104	0.78	O	O	C	O	C	
2000105	0.30	O	C	C	C	C	Rimrock decommission
2000351	0.94	O	C	C	C	C	Rimrock decommission
2000354	0.67	O	C	C	C	C	Wildlife Cover
2000357	0.90	O	O	C	O	C	
2000359	0.71	O	C	C	C	C	Wildlife Cover
2039010	0.20	O	C	C	C	C	Wildlife Cover
2039011	0.44	O	C	C	C	C	Wildlife Cover
2039012	0.70	O	C	C	C	C	Wildlife Cover
2039021	0.86	O	C	C	C	C	Rimrock decommission
2039025	0.62	O	C	C	C	C	Riparian, Rutted and Muddy
2039048	0.27	O	C	C	C	C	Rimrock decommission
2039360	0.11	O	C	C	C	C	Wildlife Cover
2100320	0.61	O	O	C	O	O	

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2100380	0.08	O	O	C	O	C	
2100393	1.26	O	C	C	O	C	RHCA class 3 stream, Fix in Alt 4
2100394	1.21	O	C	C	C	C	Wildlife Cover
2100395	0.72	O	C	C	C	C	Wildlife Cover
2100396	0.37	O	C	C	C	C	Wildlife Cover
2100400	0.36	O	C	C	C	C	RHCA, class 3
2100425	0.75	O	C	C	C	C	Wildlife Cover
2100428	0.35	O	C	C	O	C	Wildlife Cover
2100430	0.26	O	C	C	C	C	Wildlife Cover
2100436	0.78	O	C	C	C	C	Wildlife Cover
2100440	2.04	O	C	C	C	C	Riparian, Wet and boggy, Stahl Canyon
2100441	0.66	O	C	C	C	C	Wildlife Cover
2100444	0.18	O	C	C	C	C	Wildlife Cover
2100447	0.35	O	C	C	C	C	Wildlife Cover
2100451	0.84	O	C	C	C	C	Wildlife Cover
2100453	0.39	O	C	C	C	C	Wildlife Cover
2100454	0.33	O	C	C	C	C	Wildlife Cover
2100456	0.88	O	C	C	C	C	Wildlife Cover
2100457	0.72	O	C	C	C	C	Wildlife Cover
2100458	0.25	O	C	C	C	C	Wildlife Cover
2100460	0.84	O	C	C	C	C	Wildlife Cover
2100464	0.69	O	C	C	C	C	Wildlife Cover
2100465	0.39	O	C	C	C	C	Wildlife Cover
2100470	1.14	O	C	C	C	C	Wildlife Cover
2100471	0.11	O	C	C	C	C	Private Land Issue
2100477	0.20	O	C	C	C	C	Wildlife Cover
2100478	0.91	O	C	C	C	C	Wildlife Cover
2100479	0.88	O	C	C	C	C	Wildlife Cover
2100530	0.09	O	O	C	O	C	
2128014	2.01	O	C	C	C	C	Wildlife Cover
2128030	0.28	O	O	C	O	O	
2128030	0.30	O	C	C	C	C	Rimrock decommission

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2128040	1.31	O	C	C	C	C	Wildlife Cover
2128041	1.08	O	C	C	C	C	Rimrock decommission
2128060	1.03	O	C	C	C	C	Rimrock decommission
2128060	0.05	O	O	C	O	O	
2128063	0.49	O	C	C	C	C	RHCA, Class 1 crossing
2128064	0.43	O	O	C	O	O	
2128065	2.48	O	S	C	O	O	Seasonal hunting
2128065	3.21	O	S	C	O	C	Seasonal hunting
2128066	1.25	O	O	C	O	C	
2140041	0.59	O	C	C	C	C	Wildlife Cover
2140042	1.08	O	C	C	C	C	Wildlife Cover
2140043	0.24	O	C	C	C	C	Wildlife Cover
2140061	1.80	O	C	C	C	C	RHCA class 3 Crossing, Plant concerns
2140062	0.74	O	C	C	C	C	RHCA class 3 crossing
2140070	0.40	O	O	C	O	C	
2140071	0.32	O	C	C	C	C	Wildlife Cover
2140075	0.43	O	C	C	C	C	Wildlife Cover
2141000	2.11	O	C	C	C	C	RHCA class 3 crossing
2141028	0.32	O	C	C	C	C	RHCA class 3 crossing
2141030	0.24	O	C	C	C	C	RHCA class 3
2141035	0.87	O	O	C	O	O	
2141035	0.59	O	C	C	C	C	Wildlife Cover
2141040	1.00	O	O	C	O	O	
2141041	0.93	O	C	C	C	C	Wildlife Cover
2141050	0.37	O	C	C	C	C	RHCA class 3 crossing
2141060	0.67	O	C	C	C	C	RHCA class 3 crossing
2141070	0.36	O	C	C	C	C	RHCA class 3 crossing
2141090	1.21	O	O	C	O	C	
2142031	0.67	O	O	C	O	O	
2142031	0.06	O	C	C	C	C	Wildlife Cover
2142032	0.34	O	C	C	C	C	Wildlife Cover
2142033	1.21	O	O	C	O	O	

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2142034	0.12	O	C	C	C	C	Wildlife Cover
2142040	0.28	O	C	C	C	C	Wildlife Cover
2142060	0.43	O	C	C	C	C	Wildlife Cover
2142090	0.35	O	O	C	O	C	
2142095	0.38	O	O	C	O	C	
2142105	0.49	O	O	C	O	O	
2142106	0.61	O	O	C	O	C	
2142107	0.30	O	O	C	O	C	
2145000	0.62	O	C	C	C	C	Private Land Issue
2145039	0.92	O	C	C	C	C	Private Land Issue
2145040	0.47	O	C	C	C	C	Private Land Issue
2200042	0.58	O	C	C	C	C	Decommissioned, Wildlife
2200070	0.26	O	C	C	C	C	Private Land Issue
2200071	0.72	O	C	C	C	C	Private Land Issue
2200072	0.44	O	C	C	C	C	Plant concerns
2200073	0.37	O	C	C	C	C	No connection, cut off by 2200072
2201000	0.49	O	C	C	C	C	Morrow Grant OHV Park conflicts
2201010	0.90	O	C	C	C	C	Wildlife Cover
2201020	0.07	O	C	C	C	C	Morrow Grant OHV Park conflicts
2201030	1.24	O	C	C	C	C	Morrow Grant OHV Park conflicts
2300014	0.32	O	O	C	O	C	
2300018	0.47	O	C	C	C	C	Decommissioned, No Culvert
2300021	0.17	O	C	C	C	C	Rimrock decommission
2300030	1.83	O	O	C	O	O	
2300050	0.34	O	O	C	O	C	
2300050	1.11	O	C	C	C	C	Wildlife Cover
2300051	0.82	O	O	C	O	C	
2300055	0.33	O	C	C	C	C	Rimrock decommission
2300060	1.34	O	C	C	C	C	Rimrock decommission
2300070	1.19	O	C	C	C	C	Wildlife Cover. No Culvert
2300071	0.97	O	C	C	C	C	Wildlife Cover
2300080	0.19	O	O	C	O	O	

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2300080	3.32	O	C	C	C	C	Wildlife Cover
2300080	0.16	O	C	C	C	C	Rimrock decommission
2300082	0.81	O	O	C	O	C	
2300083	0.43	O	O	C	O	C	
2300087	0.22	O	C	C	C	C	Wildlife Cover
2300101	0.54	O	C	C	C	C	Rimrock decommission
2300110	1.82	O	C	C	C	C	RHCA class 3, Willow Springs
2300111	0.77	O	C	C	C	C	Critical Habitat
2300112	1.43	O	C	C	C	C	Rimrock decommission
2307033	0.28	O	O	C	O	C	
2307038	1.01	O	C	C	C	C	Wildlife Cover
2307050	1.12	O	O	C	O	C	
2307052	0.67	O	C	C	C	C	Rimrock decommission
2307054	0.43	O	C	C	C	C	Wildlife Cover
2307055	0.43	O	O	C	O	C	
2307056	0.23	O	O	C	O	C	
2307057	0.79	O	C	C	C	C	Wildlife Cover
2307058	0.20	O	O	C	O	C	
2307900	0.35	O	O	C	O	C	
2309000	0.15	O	C	C	C	C	RHCA, Big Wall Creek Crossing
2309015	0.57	O	C	C	C	C	Private Land Issue
2309020	2.10	O	O	C	O	C	
2309030	0.56	O	O	C	O	C	
2309032	0.47	O	O	C	O	C	
2309033	0.61	O	O	C	O	C	
2309034	0.54	O	O	C	O	C	
2309040	0.32	O	C	C	C	C	Rimrock decommission
2309041	0.38	O	C	C	C	C	Rimrock decommission
2309042	0.43	O	C	C	C	C	Wildlife Cover
2309043	0.15	O	C	C	C	C	Wildlife Cover
2309044	0.26	O	C	C	C	C	Rimrock decommission
2309045	0.57	O	C	C	C	C	Wildlife Cover

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2309046	0.54	O	C	C	C	C	Wildlife Cover
2309060	2.18	O	C	C	C	C	Wildlife Cover
2400010	0.26	O	C	C	C	C	Wildlife Cover
2400011	0.15	O	C	C	C	C	Wildlife Cover
2400014	0.10	O	C	C	C	C	No destination
2400019	0.67	O	O	C	O	O	
2400021	0.59	O	O	C	O	O	
2400024	1.02	O	C	C	C	C	Wildlife Cover
2400025	0.75	O	O	C	O	C	
2400026	0.49	O	O	C	O	O	
2400027	0.44	O	O	C	O	O	
2400081	1.42	O	O	C	O	C	
2400090	1.13	O	C	C	C	C	Wildlife Cover
2400120	0.71	O	O	C	O	C	
2400140	0.46	O	C	C	C	C	RHCA, decommissioned
2400140	1.15	C	S	C	S	C	Seasonal
2400140	3.01	C	S	C	S	S	Seasonal
2400141	0.32	C	S	C	C	C	Seasonal
2400142	0.07	C	S	C	S	C	Seasonal
2400143	0.89	C	C	C	C	C	Seasonal Winter Range
2400144	0.49	C	S	C	S	S	Seasonal
2400145	0.72	C	C	C	C	C	Seasonal Winter Range
2400152	0.57	O	O	C	O	C	
2400154	0.46	O	C	C	C	C	Wildlife Cover
2400155	1.06	O	C	C	C	C	Wildlife Cover
2400160	0.16	O	O	C	O	C	
2400168	0.61	O	O	C	O	C	
2400181	1.11	C	C	C	C	C	Private Land Issue
2400182	0.24	C	S	C	S	S	Seasonal
2400183	0.16	C	S	C	S	C	Seasonal
2400190	1.90	C	S	C	S	C	Seasonal
2400191	1.49	C	C	C	C	C	Redundant, Connectivity within 1 Mi

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2400192	0.43	C	C	C	C	C	Wildlife Cover
2400196	0.75	C	S	C	S	C	Seasonal
2400205	1.60	C	C	C	C	C	Private Land Issue
2400210	0.80	C	S	C	S	C	Seasonal
2400213	0.17	C	S	C	S	C	Seasonal
2400215	0.18	C	S	C	S	C	Seasonal
2400216	0.33	C	S	C	S	C	Seasonal
2400218	0.79	C	S	C	S	S	Seasonal
2400220	0.92	C	S	C	S	C	Seasonal
2400221	1.29	C	S	C	S	C	Seasonal
2400222	1.04	C	S	C	S	C	Seasonal
2400223	1.12	C	S	C	S	S	Seasonal
2400224	0.85	C	C	C	C	C	Critical Habitat
2400225	0.99	C	S	C	S	S	Seasonal
2400225	0.51	C	S	C	S	C	Seasonal
2400800	0.44	C	C	C	C	C	Private Land Issue
2400801	1.31	C	C	C	C	C	Private Land Issue, Eagle Nest
2400802	0.24	C	C	C	C	C	Private Land Issue
2402010	0.22	O	O	C	O	C	
2402020	0.95	O	C	C	C	C	Rimrock decommission
2402021	0.83	O	O	C	O	C	
2402030	1.53	O	C	C	C	C	RHCA, Culvert removed
2402040	0.18	O	C	C	C	C	Rimrock decommission
2402060	0.84	O	C	C	C	C	Rimrock decommission
2402070	0.59	O	C	C	C	C	RHCA, no culvert, South Fork Big Wall
2402080	1.14	O	C	C	C	C	RHCA, South Fork Big Wall
2406010	0.33	O	C	C	C	C	Wildlife Cover
2406011	0.37	O	C	C	C	C	Wildlife Cover
2406012	0.15	O	C	C	C	C	Wildlife Cover
2406020	0.35	O	C	C	C	C	Wildlife Cover
2406025	2.44	O	O	C	O	C	
2406026	0.92	O	O	C	O	C	

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2406040	0.53	O	O	C	O	C	
2406041	0.43	O	O	C	O	C	
2406041	1.80	O	C	C	C	C	Wildlife Cover
2406042	0.43	C	O	C	O	C	
2406045	1.05	O	C	C	C	C	RHCA, Class 3 crossing
2406050	1.22	O	C	C	C	C	Wildlife Cover
2406055	0.22	O	C	C	C	C	RHCA, Class 3 crossing
2407030	0.94	C	C	C	C	C	Seasonal Winter Range
2407031	0.51	C	C	C	C	C	Seasonal Winter Range
2407032	0.21	C	C	C	C	C	Seasonal Winter Range
2407041	1.23	C	C	C	C	C	Seasonal Winter Range
2407042	0.41	C	C	C	C	C	Seasonal Winter Range
2407043	0.37	C	C	C	C	C	Seasonal Winter Range
2407044	1.17	C	C	C	C	C	Seasonal Winter Range
2407045	0.45	C	C	C	C	C	Seasonal Winter Range
2407046	0.54	C	S	C	S	S	Seasonal
2407047	0.25	C	C	C	C	S	Seasonal Winter Range
2408000	0.44	C	S	C	S	C	Seasonal
2408010	0.14	O	O	C	O	C	
2408021	0.79	O	O	C	O	C	
2408022	0.27	C	S	C	S	C	Seasonal
2408024	0.55	C	S	C	S	C	Seasonal
2408025	0.21	C	S	C	S	C	Seasonal
2408026	0.68	C	C	C	C	C	Seasonal Winter Range
2408027	0.21	C	C	C	C	C	Seasonal Winter Range
2408030	1.89	C	S	C	S	C	Seasonal
2408031	1.56	C	C	C	C	C	Seasonal Winter Range
2408034	1.69	C	S	C	S	C	Seasonal
2408050	0.84	C	S	C	S	C	Seasonal
2408051	0.34	C	S	C	S	C	Seasonal
2408060	0.82	C	S	C	S	S	Seasonal
2500012	0.11	O	C	C	C	C	Private Land Issue

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2500031	0.38	O	O	C	O	C	
2500041	0.97	O	C	C	C	C	RHCA, Class 3 crossing
2500056	0.02	O	C	C	C	C	Private Land Issue
2500056	0.31	O	C	C	C	C	Private Land Issue
2500057	0.02	O	C	C	C	C	Private Land Issue
2500058	0.19	O	C	C	C	C	Private Land Issue
2500064	0.79	O	C	C	C	C	Wildlife Cover
2500067	0.28	O	C	C	C	C	Wildlife Cover
2500068	0.32	O	C	C	C	C	Private Land Issue
2500071	1.22	O	C	C	C	C	Critical Habitat
2500075	1.11	O	O	C	O	C	
2500076	0.45	O	C	C	C	C	Critical Habitat
2500077	1.03	O	C	C	C	C	Wildlife Cover
2500078	0.33	O	C	C	C	C	Wildlife Cover
2500079	0.68	O	C	C	C	C	Critical Habitat
2500080	1.36	O	C	C	C	C	RHCA, Class 3 crossing
2500092	0.65	O	C	C	C	C	Wildlife Cover
2500110	0.81	O	O	C	O	C	
2500120	0.58	O	C	C	C	C	Wildlife Cover
2500122	0.39	O	C	C	C	C	Wildlife Cover
2500131	0.41	O	O	C	O	C	
2500150	0.97	O	C	C	C	C	RHCA class 3
2500151	0.67	O	C	C	C	C	No Connection, 2500150 cuts off access
2500158	0.54	O	O	C	O	C	
2500161	0.16	O	O	C	O	C	
2500165	0.39	O	C	C	C	C	Critical Habitat
2500166	0.87	O	C	C	C	C	Critical Habitat
2500167	0.17	O	O	C	O	C	
2500170	1.24	O	C	C	C	C	RHCA, Red Culvert, Wildlife Cover
2500171	0.84	C	C	C	C	C	Wildlife Cover, Winter Range
2500172	0.70	O	C	C	C	C	Critical Habitat
2500180	0.90	O	C	C	C	C	RHCA, Class 3 crossing

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2500190	1.28	O	C	C	C	C	Wildlife Cover
2500200	0.99	C	C	C	C	C	Seasonal Big Game
2500201	0.40	O	C	C	C	C	Connectivity within 1/4 MI
2500202	0.62	C	C	C	C	C	Seasonal Winter Range
2500203	0.38	O	C	C	C	C	Wildlife Cover
2500400	0.60	O	O	C	O	O	
2500400	1.24	O	C	C	C	C	Seasonal Winter Range
2500410	2.76	O	S	C	S	C	Seasonal
2500600	0.93	O	C	C	C	C	Critical Habitat
2500700	1.64	O	C	C	C	C	RHCA, Culvert Removed
2500702	0.58	O	C	C	C	C	Critical Habitat
2500703	0.10	O	C	C	C	C	Wildlife Cover
2500706	1.00	O	C	C	C	C	Critical Habitat, no access
2500710	0.28	O	C	C	C	C	No connection, 2500700 cuts off access
2513030	0.57	O	C	C	C	C	Private Land Issue
2513040	0.70	C	C	C	C	C	Private Land Issues
2516055	0.55	O	O	C	O	C	
2516099	1.13	O	O	C	O	C	
2516100	0.36	O	C	C	C	C	Wildlife Cover
2516101	0.41	O	C	C	O	C	Wildlife Cover
2516102	0.73	O	O	C	O	C	
2519000	0.34	O	C	C	C	C	Wildlife Cover
2519020	0.39	O	C	C	C	C	Private Land Issue
2519081	0.70	O	C	C	C	C	Wildlife Cover
2519081	0.31	O	O	C	O	C	
2519082	0.65	O	C	C	C	C	Wildlife Cover
2519084	0.90	O	C	C	C	C	Wildlife Cover
2519085	0.48	O	C	C	C	C	Wildlife Cover
2519086	0.65	O	C	C	C	C	Wildlife Cover
2519087	0.61	O	C	C	C	C	Wildlife Cover
2519088	0.44	O	C	C	C	C	Wildlife Cover
2519089	0.52	O	O	C	O	C	

Road #	Length	Alternative					Reason
		1	2	3	4	5	
2519090	0.14	O	C	C	C	C	Wildlife Cover
2519092	0.92	O	C	C	C	C	Critical Habitat
2519093	0.18	O	C	C	C	C	Wildlife Cover
2519094	0.77	O	C	C	C	C	Wildlife Cover
2519096	0.23	O	C	C	C	C	Wildlife Cover
2519098	0.22	O	O	C	O	C	
2519098	0.20	O	C	C	C	C	Wildlife Cover

New Motorized Trails

New trail construction was proposed to make connections or complete loops. They were located on existing user created trails where possible, outside riparian areas, and to avoid important wildlife habitat areas. This makes them low risk trails to resources with a high value to the OHV users. Motorized trails are not roads and will be constructed to the minimum standard necessary for Class I and III OHV use.

Trail ID #	Length	Alternative				Reason
		2	3	4	5	
2000401	0.90	O	C	O	O	Connection from Fairview Campground to FS Road 2500400.
2128032	0.58	O	C	O	O	Connect Morrow Grant OHV park to the National Forest grassy butte area.
2128064	0.55	C	C	C	O	Provide access around the Road 2128000 mixed use restriction and a loop connection between the Morrow/Grant County OHV Park and the National Forest. This shorter route avoids a seasonal restriction that is on only one trail.
2128067	0.44	S	C	O	C	Provide access around the Road 2128000 mixed use restriction and a loop connection between the Morrow/Grant County OHV Park and the National Forest. This is partially on a user created trail.
2140428	0.55	C	C	O	C	Provide a connection between the north and south areas of Road 2100000, mixed use restriction.
2141020	0.16	C	C	O	C	Provide a connection between 2141020 and 2141040 a popular riding loop identified by the

Trail ID #	Length	Alternative				Reason
		2	3	4	5	
						public. This is a user created trail.
2142095	0.16	C	C	O	C	This connects a ridge on FS Road 2142000 to FS Road 2500000.
2309022	0.89	O	C	O	C	Provide a connecting loop between the 2400156 and the 2309020. This is an existing user created trail that was identified by the public as a popular riding loop.
2400002	3.06	O	C	O	O	Provide a route around the Road 24 mixed use restrictions.
2516010	0.38	C	C	O	C	Provide a shorter route out of Fairview Campground to the designated OHV crossing to the east side of State Highway 207.
2516103	0.20	C	C	O	C	Provide a location for a designated OHV crossing of State Highway 207 in conjunction with Oregon Department of Transportation.

Appendix D – Response to Comments

Comments and FS Responses

190 individuals or agencies responded to the request for comments during the 30 day review period: 160 were form letters, 7 were from environmental or special interest groups, 2 were from government agencies, and 17 were from private individuals.

In many cases comments were similar and combined into a summarized statement. Individual comments that are not included here are located in the project file at the Heppner Ranger District.

Alternatives

General Support of an Alternative

Numerous comments were received that expressed a preference for one alternative over the other.

(1-3, 2-3, 2-5, 2-7, 2-9, 2-11, 2-39, 2-41, 2-43, 2-49, 2-55, 4-1, 4-2, 4-3, 4-4, 4-5, 5-1, 5-2, 5-3, 5-4, 5-6, 5-54, 6-5, 6-3, 6-4, 7-11, 7-13, 7-14, 7-16, 7-15, 7-17, 7-18, 7-20, 7-24, 10-1, 10-2, 10-3, 10-4, 12-1, 13-1, 15-2, 15-6, 16-3, 16-5, 17-1, 18-1, 19-1, 21-2, 22-3, 23-1, 24-1, and 26-1)

Comments: *I would like to see this area stay the way it is now, which is presented as Alternative 1 (4-1).*

The Forest's proposed action (Alternative 2) includes a number of positive OHV management reforms, most notably the elimination of cross-country motorized travel (1-3).

[Alternative 3] provides the most acres of elk security in the project area and would therefore have the highest probability of maintaining elk on FS lands (7-11).

Alt 4, has a good balance of designated trails and open roads and does allow us safe passage from one area to another in the forest (16-5).

Alternative 5 [provides] larger proportion of non-motorized zones and refuge and foraging areas distant from open roads for big game species (6-4).

Bull Prairie Campground

Various OHV access routes near and within the Bull Prairie and Fairview campgrounds were identified by commenter's as supporting or not supporting the designation of a road as an OHV route. Commenter's have differing values and uses of the campgrounds and identified preferred alternatives that supported their desired use of the campgrounds. (4-7, 5-59, 5-60, 5-61, 10-5, 14-1, 18-5, 15-4, 22-2, and 22-4)

Comments: *Prevent noise pollution from destroying the quiet serenity of the Bull Prairie Park (5-59).*

[N]ot being able to ride an OHV from Bull Prairie campground does not make any sense to me... especially when other motorized vehicles are allowed (22-2).

General Support of Project

Several comments were received that provided general support of the project proposal but do not identify a preferred action alternative. (1-2, 2-1, 2-2, 2-10, 2-12, 6-1)

Comment: *We are supportive of Forest Service efforts to better regulate off-highway vehicle (OHV) use in sensitive areas, minimize conflicts associated with OHV use ... (1-1).*

FS Response: These comments are valuable in considering the social impact of any particular alternative. A wide range of opinions remain for the multiple-use values of our national lands. Alternatives were developed to the proposed action in order to address many of these opinions and beliefs (issues) of how the National Forest lands should be managed. Alternatives to the proposed action must still meet the purpose and need to designate an OHV trail system that meets the public demand while still addressing impacts to various resources. The concerns expressed in the comments that identified an alternative preference or general support of the project based on a particular resource is addressed in the responses that follow.

Project Development and Analysis

Several comments related to the development of the project, alternatives and the NEPA process. (2-25, 5-48)

Comment: *We consider all the issues "not considered major" listed on p14. of the EA to be major issues... that should be fully analyzed (2-25).*

FS Response: Issues are identified by the interdisciplinary team and the scoping process based on the potential for a cause effect relationship from the proposed action. Other issues listed on page 14 of the EA are issues that were analyzed in Chapter 3. Major issues are the issues that drive the development of an additional alternative to the proposed action. Design elements are included based on site specific concerns that were not sufficiently addressed by existing management requirements. These design elements are developed based on local knowledge of the area, information received during the scoping process, and management requirements already in place as identified by other NEPA processes, laws, regulations, or policies.

Range of Alternatives

Several comments were received that suggested a wider range of alternatives. Particularly alternatives that reduced miles of designated OHV trail. (1-28, 1-30, 5-47)

Comment: *Lack of alternatives that minimize (vs. increase) OHV use (5-47).*

FS Response: When considering the range of alternatives the Forest Service must also consider the purpose and need of the project. The West End OHV Project is not a forest wide decision. Most of the Umatilla National Forest analyzed and designated OHV use and open road designation during the 1990s in access and travel management planning. The Heppner Ranger District completed this planning process in 1992. During this process the east half of the district was designated routes only for OHV use and the west half remained open for cross country travel for OHV use. Because most of the District has designated routes it was not included in the purpose and need for this project nor was the designation of open roads that are currently also designated for OHV use on the west half (project area). In developing alternatives the range identified and analyzed for OHV route designation varied from 0 miles to 86 miles of additional trails and all proposed alternatives reduced the overall miles of OHV use through the elimination of cross country travel.

Another commenter wanted to see an alternative that would have eliminated OHV use adjacent to private land (19-4 and 19-5).

Comments: *Propose that you make a minor change in your action alternatives to leave a buffer of at least one half mile between USFS land and private land (19-4).*

FS Response: Two alternatives (3 and 5) do not designate any additional trails within one half mile of private land. Only open roads designated as OHV trails in the 1992 ATM Plan are located within the requested half mile buffer.

Another concern over alternative development requested that alternatives consider the potential to affect specific resources (1-26, 2-28).

Comments: *The Draft EA failed to consider reasonable alternatives designed to meaningfully protect the Heppner RD's natural resources, in particular clean water, wildlife, and wildlife habitat, and therefore violated NEPA and the CEQ regulations (1-26).*

FS Response: Alternatives were developed to eliminate or reduce effects to streams and fish. All closed roads to be used within RHCAs of fish bearing creeks have existing crossing structures (2 crossings) and no additional effects to fish populations will occur with the use of these roads. There are also 12.2 miles of road within RHCAs of non-fish bearing class 4 streams (intermittent) with up to approximately 33 associated crossings. These are all existing roads with existing crossing structures and will not lead to additional sediment entering creeks over the existing condition. A determination was made that these designated trails would not likely adversely affect steelhead or its habitat. (Aquatics report pg 16-17).

Another commenter requested the Forest Service to consider a range of elements in alternative development.

Comment: *Consider alternatives that would aggressively reduce overall route densities within acceptable science-based ecological limits across the entire plan area;*

Consider alternatives that would determine how best to physically close, decommission, and obliterate unnecessary or unacceptable routes, in particular unauthorized, user-created routes;

Consider alternatives that would not only reduce route densities, but entirely eliminate routes within key areas to protect environmentally sensitive watersheds and wildlife habitats and minimize user conflicts by establishing quiet-use recreation areas; and

Consider alternatives that would not have provided exceptions from the prohibition of motorized cross-country travel for purposes of dispersed camping, firewood gathering and game retrieval.

Because these elements are "reasonable" and "viable," the Forest Service's failure to consider them renders the EA unlawful (1-97).

FS Response: The Forest Service considered each of these elements through alternative development, design elements, and implementation of the Travel Rule.

The West End OHV Project developed several alternatives with varying levels of route densities based on resource impacts. Alternative 3 does not include any additional OHV trails to be added to the current road system. Science based analysis considers the effects to various resources including: wildlife habitat, soils, water, aquatic species, T&E species, cultural resources, recreation and landscape characteristics and can be found in Chapter 3 of the EA.

The Compliance and Enforcement section in Chapter 3 identifies steps that would occur in order to close routes that are not part of the designated OHV system. At a minimum all routes are closed unless designated as open.

As stated in the EA, cross country travel is only allowed up to 300 feet from an open road to and from dispersed campsites or firewood gathering sites if resource damage would not occur. This does not include cross country travel throughout the area and does not include game retrieval.

One commenter requested to have additional information tracked from specialists reports into the EA.

***Comment:** Decision thresholds included in specialist reports, should be listed in the final EA (6-13).*

FS Response: Decision thresholds are determined by the responsible official. Specialists identify and analyze the effects of the activity using both quantitative and qualitative measures to inform the decision maker and the public. Forest Plan standards are identified in each specialist report and the EA when applicable to the effects. The responsible official will identify decision thresholds that are pertinent to the selected alternative in the decision notice.

Comments were received that questioned the scope and scale of the need for this project.

***Comment:** the EA's premise of a need to accommodate ever-increasing levels of OHV user demand on the Umatilla National Forest is called into serious question (see, e.g., EA pp. 1-3, 1-13)(1-48).*

FS Response: The purpose and need for this project was developed based on the Travel Rule and the existing conditions in the project area. The public became involved in identifying the purpose and need in the fall of 2006. After various forms of public collaboration the purpose and need was developed based on the input received during this collaborative process and released in February, 2008. The purpose and need was further defined based on input from scoping and included in the document released for 30 day comment and review period in December 2008. Details of public involvement and documentation of the processes used to develop this project can be found in the project file and in Chapter 1 of the EA.

***Comment:** A purpose and need to provide connection to an OHV park is too narrow under NEPA, biased to support the Forest Service's proposed alternative (2-30, 2-52).*

FS Response: During project development the interdisciplinary team conducted many efforts to involve the public and other agencies in the development of the purpose and need and the proposed action. One specific item that we heard was that there was a need to continue providing connections between the Forest Service and the OHV Park. Under the existing condition these connections were available by traveling on the designated trails in the OHV Park and cross country on the National Forest. By designating a trail system on the National Forest the connection locations between these two ownerships would change.

Design Suggestions/Alternative Development

Class II OHV

One commenter made several suggestions for adding Class II OHVs to the trail system beyond what was already included in the 1992 Access and Travel Management Plan. (15-1, 15-3, 15-5, 15-11)

Comment: *class II trailsold roadbeds that have become impassable to low clearance vehicles, old cat road/trails, skid roads/trails, firebreaks etc. Should require at a minimum 4 wheel drive and in some cases, a winch or traction aid device. Restriction can include seasonal or erosion based closures to keep the route in good condition to the easement holder can get in for repairs/maintenance (15-11).*

Response: Class II OHV use was considered in project development as well as alternative development. Class II OHV use is included in the 1992 ATM Plan. No additional routes were designated in this project. The interdisciplinary team's consideration of Class II OHV use on trails was discussed in Chapter 2, *Alternatives Considered but Not in Detail*.

Class II use locally includes: 207 miles of open roads in the project area, 407 miles of open roads on the Heppner Ranger District, 1,800 miles of open roads on the Umatilla National Forest, and 186 miles of trails, two jeep crawls, and 2 play areas in the Morrow/Grant County OHV Park.

Road and Trail Designations

Several comments were received that requested specific roads be closed to all motorized vehicles or roads to be closed to OHVs that are designated as open in the 1992 Motorized Access and Travel Management decision (Travel Plan). (5-14, 5-16, 5-18, 5-20, 5-22, 5-24, 5-26, 5-28, 5-30, 5-34, 5-37, 5-43, 5-32, 5-39, 5-62, 5-63, 19-3)

Comment: *Close all roads to ATV's which are adjacent to Bull Prairie, 5-39*

FS Response: These comments involve roads designated open from the 1992 ATM Plan in the planning area. This project is not reconsidering OHV route designation on roads that are open to motor vehicle use under the 1992 ATM Plan that are in compliance with the Travel Rule.

Other comments identified closed roads that are proposed as designated trails in one or more of the alternatives to be closed to OHVs. (5-9, 5-10, 5-11, 5-12, 5-13, 5-15, 5-17, 5-19, 5-21, 5-25, 5-23, 5-27, 5-40,

FS Response: Various closed roads are incorporated into the OHV system through alternative development. The alternatives are responsive to these comments. Alternative 3 does not propose to designate any closed roads as OHV trails.

Another group of comments identified additional OHV routes that were not proposed under any of the action alternatives. (4-6, 10-6, 14-3, 17-2)

Comment: *old skid trails that are closed to auto's provide great riding area that do not impact habitat (14-3).*

FS Response: The trails analysis, contained in the project file, identifies closed roads that were eliminated from consideration of the designated OHV trail system and the resource concern associated with the elimination. User created trails and trails proposed by users that were identified during project development and the scoping process were considered and included when resource concerns could be minimized. Areas where connections were identified by the interdisciplinary team or during project development and scoping were incorporated into alternative development. Areas where current use may be occurring or where closed roads were not incorporated in to alternatives were identified as having a resource concern.

OHV Park

Comments were received that requested no connections between the National Forest OHV designated route system to the Morrow/Grant County OHV Park.

OHV Park, Close all roads, trails, etc. that allow access into the Forest from the Morrow County ATV Park (2-4,5-42).

FS Response: Two open roads currently connect to the OHV Park that are not part of this decision and would not be closed to OHV use based on 1992 ATM Plan (EA page 3-8). Alternative 3 does not identify any additional connections to the OHV Park. The analysis of the various connections to the OHV Park is included in each resource section of Chapter 3.

OHV Travel off Open Roads

Comments were received that questioned the allowance of traveling off of open roads with OHVs or other motorized vehicles to access dispersed camping sites or to gather firewood or that questioned the actual use of the off road travel within 300 feet of an open road. It was unclear to several commenters when a person could travel up to 300 feet from an open road. (1-12, 1-15, 1-17, 1-20, 1-22, 1-25, 1-27, 1-29, 1-31, 1-33, 1-35, 2-22, 2-24, 2-27, 2-32, 2-33, 5-35, 6-6, and 6-8)

Comment: *Does the Forest intend to allow exemptions for big game retrieval and dispersed camping off of the designated route system, 5-35?*

FS Response: The Umatilla National Forest allows motorized vehicles to travel from an open road up to 300 feet laterally for access to dispersed camping sites or wood gathering, provided that travel over or around a physical road-closure device is not required. The firewood permit system on the Umatilla National Forest allows travel of a motor vehicle up to 300 feet lateral slope distance off of an open road to cut and gather firewood. Access to dispersed camp sites is

an integral part of the recreation that occurs on the Heppner Ranger District. The access up to 300 feet for firewood and camping is not included in the decisions to be made for this project and will continue either under the firewood permit system or through access to and from dispersed camp sites.

The use of OHVs to and from campsites or to gather firewood does not allow indiscriminate cross country travel within 300 feet of all roads. It only allows travel to and from the destination. Excessive travel or travel that unreasonably disturbs the land within 300 feet of any open road while traveling to a dispersed camp or while gathering firewood would be considered resource damage (36 CFR 261.15(h)) and would be illegal. Travel to and from a camping or wood gathering site must occur in areas where resource damage would not occur.

A motor vehicle is not allowed to travel off of a road for big game retrieval. OHVs would be required to follow the same restrictions as all motor vehicles on open roads. An OHV would not be allowed to travel off of any designated trail.

Ongoing monitoring that identifies resource concerns resulting from the use of OHVs in the area of dispersed camp sites would require actions to eliminate the activities causing damage.

Unsupportive of OHV use

Several comments were received that either did not support OHV recreation on the forest or that did not support all types of OHV recreational uses on the forest.

Comments: Unlike the ORV's being used simply as transportation, "recreational" ORV users on ORV dedicated "trails" will "Play" and "Play" for an ORV will be much more impact on a lower quality "trail" than is the ORV used solely on the General Use Motorized Vehicle Roads for transportation where "cutting cookies" is frowned upon (though it happens) (5-53).

I have very strong negative feeling about OHVS users.....I support legal use of OHVs on designated trails for those hunters that are unable to walk, but am very disappointed by the increasing use of OHVs in places where they do not belong, by hunters that do not need them (21-1).

FS Response: As stated in Chapter 1 of the EA, support of OHV use on the National Forest is highly variable.

Cumulative Effects

Several comments were received that identified land outside of the project area that would have the potential to cumulatively effect the area as a result of OHV use. (1-16, 1-19, 1-39, 1-57, 1-59, 1-61, 1-90, 7-25, and 7-26).

Comment: BLM, The Forest Service's decision to limit the geographic scope of its cumulative impacts analysis to address only the private Morrow County OHV Park, and not to address the ramifications of designating OHV roads and trails that lead to adjacent Bureau of Land Management (BLM) lands and other routes on the Heppner RD that can be accessed via Forest Road 22 (Grant County Road 3/Grant County Road 3), violates NEPA's "hard look" requirements., 1-90

FS Response: The Recreational Opportunity section in Chapter 3 considered adjacent lands,

including BLM lands. There would be no designated trails connecting the project area to the BLM. Forest Road 22 is a two lane gravel road under county jurisdiction. By state law (ORS 821.020) this road does not allow OHV use. There are no BLM roads connected to this road and therefore there is not a 90 degree crossing available between trails systems on either the FS or BLM lands. Therefore there would be no cumulative effects between the trail systems located on BLM lands and the proposed designated trail system on the NF lands under any of the alternatives.

The analysis did identify the Morrow/Grant County OHV Park as an adjacent land with OHV routes connecting to the project area. This spatial connection and route connection was included in the analysis disclosure in Chapter 3. There may be similar opportunities for OHV use between the OHV Park and adjacent National Forest. Designating an OHV system on the National Forest is not specifically designing or managing an area exclusively for OHV use as it is in the OHV Park. The project area will continue to be a multi-use area. Cumulative effects of the OHV Park found that connecting trails between the park and National Forest would provide users access to various types of OHV riding. The current Forest Plan identifies the need for OHV opportunity on National Forest lands.

No other public lands are adjacent to the West End OHV project. Analysis did identify that private lands may have OHV use but no private lands are currently or proposed to be designated as an OHV riding area.

Comment: *It follows that the effects of the following past, present, and foreseeable future actions must be considered in the cumulative effects analysis for the West-End OHV Project: Road building; Creation of unauthorized, user-created routes; Siviculture activities; Livestock grazing; Dispersed camping; Soil erosion; Water quality impacts; Wilderness values (including effects on the adjacent North Fork proposed Wilderness Study Area located on Bureau of Land Management lands), Effects on listed species (particularly steelhead and bull trout); and Lack of enforcement of road/route/trail designations and foreseeable creation of illegal, user-created routes., 1-92*

FS Response: Many past activities are incorporated into the existing conditions or base line data for specific resources. Past activities such as road building are measured as existing activities of road miles and use. Activities that are going to continue to provide the same effects as they currently do and we do not expect these effects to change over time or within the temporal boundaries identified for the resource were included in the existing conditions. Other activities that are expected to increase or decrease effects over time which would have a cumulative effect with the project activities are included in the cumulative effects sections of each of the resources. The "Draft John Day Basin Resource Management Plan and Environmental Impact Statement" (BLM, 2008) evaluated areas to be managed for Wilderness Characteristics. The proposed North Fork Wilderness Study Area was not identified and therefore not a proposed project to be considered in a cumulative affects analysis. Further communication with the commenter revealed that this proposal was submitted by an environmental organization and that the proposal is not a proposed action to be considered in cumulative effects analysis. Cumulative effects analysis was completed in accordance with FSH 1909.15.1. Past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other

agencies and individuals that may have a measurable and meaningful impact on particular resources were considered in the cumulative effects analysis.

Executive Order 11644 and 11989

Comment: *What actions has the Forest Service taken prior to the initiation of travel planning to close routes causing environment damage, consistent with its authorities under Executive Order 11644 and 11989? (5-38, 5-44, 5-51)*

FS Response: In 1992 the Umatilla National Forest initiated access travel management at the district level. This planning effort included the designation of roads to be open to the public, and the designation of roads, trails and areas for OHV use. On an annual basis road closure signs and information board signs are replaced as needed, Motorized Access and Travel Management Maps are updated and reprinted. During the high use period (May thru October) forest service personal maintain 12 information boards across the Heppner Ranger District and update information as needed. Areas where resource damage could occur, where suspected illegal OHV use may occur, and high use areas are monitored by FS employees, forest protections officers, forest law enforcement officers and law enforcement from other agencies. Enforcement includes targeting high use areas where resource damage could occur.

Forest service personal are continually monitoring activities and resources throughout the district. Actions are taken to eliminate or mitigate the affects if an area is identified as having the potential to cause/result in resource damage. For example: a dispersed camp site was recently closed due to potential for resource damage as a result of motorized use. Another area was posted with information signs to educate the users of appropriate activities on National Forests. Both of these situations resulted in the desired outcome of compliance and elimination of the potential resource damage. In 2008, within the project area, 8.7 miles of road decommissioning occurred on old road beds that were identified as low value-high risk based on resource risk and infrastructure needs. Another 9 miles of road decommissioning is planned for 2009. Road decommissioning is an ongoing activity and will continue as budget allows.

NEPA EA vs. EIS

Several comments were received that requested further clarification on the use of an environmental assessment for the documentation of this project. (1-7, 1-8, 1-9, 1-10, 1-11, 1-13, 1-32, 1-36, 1-37, 5-45)

Comments: *The Forest Service is violating the National Environmental Policy Act (NEPA), and NEPA's implementing regulations promulgated by the Council on Environmental Quality (CEQ), by relying on an EA rather than an Environmental Impact Statement (EIS). Given the complexity of the route designation process and the long-term consequences of designating a huge network of routes to other forest users and the environment, an EIS is required (1-7).*

FS Response: This project is proposing to designate between 0 to 86 miles of additional OHV trails to the current 207 miles of designated open roads used for OHVs and eliminating cross country travel throughout the 92,000 acre project area. The environmental effects to resources, including recreation are evaluated in the EA. The deciding official considers the disclosed effects

to determine if the proposed action would have a significant effect on the quality of the human environment. In the case of the West End OHV Project a finding of no significant impact will document this finding as part of the decision.

Roads Analysis

Several comments were received that questioned how the Forest Service would pay for road decommissioning and trail maintenance (9-1, 9-6, 9-7, 2-42, 5-49).

Comment: *Road should be recognized as cost that the impoverished FS can not longer bear, unless the asset value of the road clearly justifies the cost of keeping the road or trail open (9-6).*

FS Response: A roads analysis or trails analysis is completed at the project scale. This analysis compares the value of a road and the associated environmental risks. The Trial Analysis for this project is included in the project file located at the Heppner Ranger District. There is an assessed value of recreational opportunity provided by OHV use. Although this value is hard to measure against the cost of maintaining the designated trail system the EA addresses the expected average cost for trail maintenance for the project area. Other costs, such as road decommissioning is not included in trail maintenance costs. These actions occur on a site by site basis as a road is identified as no longer needed for administrative reasons. This project does not propose to decommission any roads.

Comment: *The Draft EA states that “user-created trails would be eliminated” (p. 3-68) but gives no details regarding the timing and methods of the proposed route obliteration (1-49).*

FS Response: This line was removed from the EA to avoid any confusion. Monitoring would identify past or current user created trails that are not included in the designated trail system. These user created trails would be rehabilitated as needed to protect resources and to eliminate further use (see EA Chapter 2, Design Element #13).

Several comments focused on road decommissioning and general access travel management in the project area.

Comment: *We do not favor any road closures (13-2). The Draft EA lacks a description of Forest Service plans regarding the closure and obliteration of existing routes that are not included in the final road and OHV trail system (1-47)*

FS Response: This project is not identifying roads to be closed nor is it identifying roads to be decommissioned. This project is only considering the designation of an OHV trail system. Roads analysis associated with other projects has identified several roads to be decommissioned in the project area.

Several comments were received that questioned the scale of the project or the decisions to be made in this project. (1-18, 1-21, 1-23, 6-12)

Comment: *The project NEPA documentation must include a plan for route closure that would include a timeline, budget commitment, and restoration strategy for all routes considered surplus and not necessary for administrative purposes. If the Heppner RD considers maintaining all non-designated routes as necessary for administrative purposes, the project NEPA documentation must include a statement to that effect and the potential environmental impacts of its decision must be analyzed and disclosed (1-23).*

FS Response: The West End OHV project is not an Access Travel Management plan for the project area. This project does not propose to close routes or roads. This project proposes to designate OHV routes and eliminate cross country travel.

Comment: *The proposed action and other action alternatives analyzed in the Draft EA fail to address the “minimum system” regulation found at 36 CFR § 212.5(b)(1) (1-63). 1-21*

FS Response: In 2004 a forest-wide roads analysis was completed in accordance with 36 CFR § 212.5, (Roads Analysis Report, Umatilla National Forest, 2004 and can be found at <http://www.fs.fed.us/r6/uma/projects/ecosystem/index.shtml#roads>). In addition, during the development of the proposed action for the West End OHV project the interdisciplinary team conducted a project level analysis and evaluated resource risks of all closed roads within the area. This resulted in eliminating 145 miles of closed roads from consideration for motorized trails in order to ensure that adverse environmental impacts would be minimized.

General Comments

Comment: *Are these closed roads to be used as trails adjacent to streams, invasive plants or sensitive plants or wildlife (2-15)?*

FS Response: The hydrology and aquatics reports identify up to 1.9 miles of closed roads within RHCAs of fish bearing streams where trails would be designated. Only OHVs would be allowed on these roads. There are only 2 crossing associated with these roads and stream crossing structures already exist. There are also 12.2 miles of road within RHCAs of non-fish bearing class 4 streams (intermittent) with up to approximately 33 associated crossings.

The Noxious Weed Specialist report identifies 39 noxious weed sites that were inventoried between 2004 and the present along closed roads proposed for OHV trails in alternatives 2 and 4 and 9 noxious weed sites in Alternative 5.

The Biological Evaluation for botanical species identified no sensitive plants along designated trails (closed roads).

The Biological Evaluation for terrestrial wildlife found that the Columbia spotted frog is known to occur within the project area. The areas with a potential to support spotted frogs have no open water fords and OHVs are not allowed in wet areas and streams, therefore the BE found the potential for impacts on spotted frogs to be “no impact” in the action alternatives and a “may impact” for the no action alternative.

Comment: *Alt ,3 expect dead end on road 2402 at 24 back towards 23 (mixed use) compliance will be low here (18-2).*

FS Response: Alternative 2 and 4 propose a new trail designated to provide OHV users a loop ride back out of the Wall Creek area. Alternative 5 also proposes a loop to the east to avoid backtracking. Monitoring will consider areas like this were compliance issues may be a concern. The compliance and monitoring section in Chapter 3 of the EA recognizes this concern.

Comments: *A new non-street legal ATV Route (Notch Road) 5-33.*

FS Response: This road is under Wheeler County jurisdiction and is not part of this projects decision. This road was considered in cumulative effects analysis as a road open to all motor vehicles.

Comment: *Timber harvest should be either re-routed or closed for the minimum time required for safety and stabilization of the trail, 15-10*

FS Response: Designated trails and roads can be administratively closed as needed for resource protection and public safety.

Comment: *meet all state and federal safety standards, 5-29,*

FS Response: The forest service does comply with all state and federal safety standards pertaining to OHV use (36 CFR 261.15(i)).

Comment: *potential for drawing more non-street legal OHV users to the area (5-31).*

FS Response: Identifying a designated OHV system on National Forest lands may increase or reduce the desire to recreate in this area depending on the individual user.

Comment: *Prohibit "paddle" tires on all classes of OHVS. This will help mitigate dust and erosion issues, 15-8*

FS Response: There currently is no restriction on this tire type for OHVs in the project area. Monitoring would consider equipment type and resource damage, dust and erosion, based on site specific effects.

Comment: *Noise, require the state limits on noise, or even drop the requirement to a slightly lower level, 15-7*

FS Response: Oregon State law requires mufflers to be maintained at, or below, 99 decibels (http://www.oregon.gov/OPRD/ATV/qa.shtml#Safety_Laws_Requirments). The FS requires that OHV users comply with all state laws.

Comment: *The forest plan is seriously out-dated given the unforeseen dramatic expansion of OHV use (2-46).*

FS Response: Everyone can agree that OHV use has increased since the Forest Plan decision was first implemented. Access and Travel Management, project specific analysis, implementation of best management practices, ongoing monitoring, enforcement, and this project all address and respond to this increase in OHV use.

***Comment:** during non-hunting season we see very little use of these particular areas from people without ATVs (Fossil Unit) (16-6).*

FS Response: OHV use varies throughout the project area and throughout the year.

Several comments were received that expressed concerns over the impacts to resources and safety of riding OHVs on roads open to full size vehicles. (1-45, 11-1, 16-2, 16-4)

***Comment:** it is our belief that OHV use is appropriate only where it can be demonstrated that such use will be controlled and directed so that it does not adversely affect forest resources or the safety of users of the national forest, and where it can be demonstrated that OHV use will not pose significant conflicts with residences and or other uses on the forest or adjacent public lands (1-45).*

FS Response: The intent of designating a system of roads, trails, and areas for OHV use is to reduce impacts to resources, reduce user conflicts, and increase user safety on the national forest.

Three action alternatives provide additional miles of OHV trails that do not allow full size vehicles. The Forest Service completed an engineering analysis (mixed use) in 2008. This engineering analysis included technical evaluation of road conditions and traffic use. Procedures outlined in FSH 7709.55 Chapter 30 were used in evaluation and decision of mixed use.

***Comment:** Wheeler County has not been publicly informed of what is happening to them (5-50).*

FS Response: Before the proposed action was developed the public became involved in this project through public meetings, newsletters, internet, and personal contact. Following the development of the proposed action scoping letters were mailed, the public access web page was updated, and public meetings were held in Monument, Fossil, and Heppner. A detailed description of public participation is included in Chapter 1 of the EA.

***Comment:** Does the Forest Service intend to publish an MVUM of existing designated routes as an initial step, or delay publication until travel-planning activities have been completed? If the former, how (5-57).*

FS Response: An MVUM map will be published for this area following the decision. A preliminary map for the project area will not be published. If no appeals are filed within the 45-day time period, implementation of the decision may occur on, but not before, 5 business days from the close of the appeal filing period. When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition (36 CFR 215.9). The Forest Service intends to implant the decision this year if the earliest implementation date provides time to publish a

MVUM and inform the public. MVUM maps will be published annually.

Recreation

Recreation Opportunity Spectrum

Several comments received requested disclosure of the recreational Opportunity Spectrum designation of the project area and of the proposed trails. (1-46, 1-42, 1-44, 1-41, 1-69)

Comment: *The project NEPA analysis should identify and summarize the extent of motorized routes, if any, that currently cross or are located within lands identified in the Forest Plan as Semi-Primitive Non-Motorized (SPNM) areas., 1-44*

FS Response: Roaded Natural and Roaded Modified are the only designations in the project area. Both allow managed OHV use. This information is included in the Recreation Report.

Recreation Non-Motorized

Several comments were received that supported the desire for non-motorized recreation, questioned the lack of statistics and information for non-motorized recreation, and management of recreational demands. (1-5, 1-51, 1-53, 1-55, 5-5, 5-7, 5-8, and 21-3)

Comment: *disturbance of hunters... I hunt as far from roads as I can (21-3).*

FS Response: The EA identifies the issue of the desire for non-motorized recreation and analyzes the effect of designating OHV routes throughout the project area. As discussed in Chapter 3, Recreation section: an increase in areas where OHV use would not be allowed would actually result in increased opportunities for non-motorized recreation. The purpose and need of this project is to designate a system for OHV use while considering effects to other resources, including recreation.

The Land and Resource Management Plan is the analysis that makes the determination of specific land use designation. The management areas summarized in Chapter 1 of the EA identifies the level or limits of OHV use in the project area. Although some management areas limit the use of OHVs to designated routes; all management areas allow OHV use. Resources that may have a cause and effect relationship with the use of OHVs in the project area have been analyzed and are discussed in Chapter 3 of the EA.

Soils, Water, and Fish

Soils

Comments: *There is a complete lack of site specific information pertaining to the ecological condition (soils) of proposed new trails: regarding new ground breaking, 2-20*

Soils analysis fails to specify the type of soils affected by specific proposed trails and likely impacts to these soils from OHV use and implications for future soil fertility and productivity (2-23).

FS Response: The soils report lists the soil types (series names) found at the proposed new trail locations. These were derived by 1) analysis of the TEUI (Terrestrial Ecological Unit Inventory) data at the proposed trail locations, and 2) field verification by the Forest Soil Scientist of most of the proposed trail locations and soil types specific to those trail locations. Field observations included assessment of the suitability of the locations for trail use and whether design criteria and BMPs would be adequate at those sites. Descriptions and interpretation reports are included in the file copy for the soil types involved. In addition, copies of some of GIS map views are included indicating the trail locations overlain on the TEUI map. The EA did not include raw data from the soils report but did include impacts of the trail construction on the affected soil, and is listed by Alternative, measured in acres, and indicates those acres would be removed from productive capacity on a long-term basis (detrimental soil disturbance).

Hydrology

Several comments were received that expressed concerns over the disclosure of effects of OHVs to water quality.

***Comments:** Impacts and issues not sufficiently disclosed or addressed in the Draft EA: OHVs also irreparably impact soils, detrimentally affecting hydrology and soil subsurface communities (1-24).*

There is a complete lack of site specific information pertaining to the ecological condition of proposed new trails: Adjacent riparian areas subject to potential additional sedimentation (2-21).

How are shade reductions and sedimentation from OHV use separated out from other causes? How is it determined that they are not extensive (2-31).

FS Response: Site specific information and the effects of the OHV Project are summarized in Chapter 3 of the EA. Detailed information and analysis of effects may be found in individual specialists' reports and the project file.

***Comment:** Which three streams in the project areas are listed as water quality limited because of sediment (2-26)?*

FS Response: The 303 (d) listed streams may be found in the Clean Water Act section of Chapter 3. They include portions of Brown, Henry, Big Wall, Indian, Porter, and Wilson creeks and Stahl Canyon.

Several comments were received that expressed concerns of OHV use near or within streams.

***Comments:** There should be no OHV trails near these streams (303d listed for sediment) to prevent further degradation, which is not allowed under the Oregon Clean Water Act (2-29). soil erosion and resultant watershed degradation caused by OHV use (21-5). I regularly observe OHV crossing of water courses, resulting in erosion and sediment input to streams that should not be allowed under any land management scenario (21-6). There are OHVs out there creating their own roads and resultant stream channels all over the place (21-7).*

FS Response: The Action Alternatives are designed to be consistent with the Clean Water Act. They would eliminate cross-country travel by OHVs. The Action Alternatives are estimated to reduce OHV caused sedimentation in streams by at least 50 percent. No new trails or crossings would be constructed in RHCAs. The Action Alternatives reduce the number of OHV crossings of streams by at least 66 percent. The effects of road use and maintenance, and trail construction, use, and maintenance would be mitigated with Best Management Practices and Design Criteria. The effects are expected to be localized, with low magnitude and short duration, and are not expected to affect any beneficial uses (EA, Chapter 3, Hydrology Section).

Comment: *There should be no stream crossings involved in OHV trails -- especially as some OHV riders like to cross streams, 2-41*

FS Response: Up to 1.9 miles of closed roads within RHCAs of fish bearing streams will be designated as trails. There are only 2 crossing associated with these roads and stream crossing structures already exist. There are also 13 miles of road within RHCAs of non-fish bearing class 4 streams (intermittent) with up to approximately 33 associated crossings. These are all existing roads with existing crossing structures and will not lead to additional sediment entering creeks over the existing condition.

Comment: *EPA applauds..... Removal of roads from consideration where important resource concerns existed (6-7). [W]e believe that the interaction between forest roads and water lies at the heart of several key issues surrounding the effects of road in the environment (6-9).*

FS Response: The comment is appreciated. The interaction of roads and water is one of the reasons for the District's road decommissioning program.

Fish Species and Aquatic Habitat

Several comments were received that expressed concerns over the effects to fish and fish habitat from the designation of closed roads as OHV trails. (2-16, 2-17, 2-18, 2-34, 6-11)

Comment: *All OHV trails must stay out of designated critical habitat for steelhead trout and be well outside of all riparian zones, with no fording of streams, due to potential for sedimentation of streams and degradation of water quality (2-16). (2-17, 2-18, 2-34, 6-11)*

FS Response: Under action alternatives 2, 4, and 5 up to 1.9 miles of closed roads within RHCAs of fish bearing streams will be designated as trails. These roads currently exist and there will be no additional disturbance to riparian vegetation. There are only 2 crossing associated with these roads and stream crossing structures already exist (a bridge and a culvert). These crossing structures will keep OHVs out of the creek and prevent sediment inputs at these locations. There are also 13 miles of road within RHCAs of non-fish bearing class 4 streams (intermittent) with up to approximately 33 associated crossings. These are all existing roads with existing crossing structures and will not lead to additional sediment entering creeks over the existing condition. The majority of these roads are in class IV intermittent riparian areas. Typically when these roads are used by OHVs the streams are dry and sediment is not

transported downstream to fish habitat. A determination was made that these designated trails would not likely adversely affect steelhead, redband or their habitat. (Aquatics report pg 16-17).

Comment: *It seems to be flawed analysis to judge that there will be only beneficial effects from the action alternatives to mid-Columbia steelhead, red band trout, DCH, and EFH (2-35).*

FS Response: The miles of closed roads to be designated as a trail in all action alternatives in all cases will be less than the existing condition. The two crossings on fish bearing streams are on a large cement bridge and over a culvert. The closed roads to be used are all existing roads with existing crossing structures and will not lead to additional sediment entering creeks over the existing condition. The action alternatives would use at least 245 miles less trail/road than the no action alternative, with 95 fewer stream crossings. This will also eliminate the use of riparian areas off of existing road beds allowing areas along streams to recover where there was concentrated OHV use previously. Only existing closed roads would be used in RHCA's so there would be no additional disturbance to any riparian vegetation.

Comment: *Just because there may be improvement from existing condition does not mean that all effects of the action alternatives will be beneficial -- another alternative could be devised that eliminates all OHV impacts to these fish species or reduce them more than the preferred alternative., 2-19*

FS Response: Alternative 3 eliminates all designated trail stream crossings and use of closed roads in RHCA's with the restriction of open road use only. Effects comparisons between alternatives that include stream crossings or designation of trails within Riparian Habitat Conservation Areas and Alternative 3 is included in the EA and Aquatics BE. The conclusion found that although Alternative 3 would have the least potential for impact to riparian areas all action alternatives would not be expected to lead to additional sediment increases over what already exist with the use of existing roads.

Wildlife

Big Game and Elk

A comment questioned why Forest Plan standards were different between management areas.

Comment: *Why is the FP standard so much lower for E1 than for C3 given elk's consistent habitat requirements (2-59)?*

FS Response: Forest Plan HEI and cover standards for management areas are based on the goals of the management area in question - the C3 management area has a goal of providing a high level of habitat effectiveness in winter range for elk. The E1 management area is not located in a winter range and has a greater emphasis on forage than cover.

Some commenters thought that the affected environment (existing conditions) for elk and their habitat were not adequate. (1-91 and 1-93)

Comment: *Habitat needs, including cover, forage, fawning and/or calving areas, the ratios of bulls/bucks to cows/does, survival rates and fluctuations of young, and overall cumulative impacts to these species are not sufficiently assessed (1-93).*

FS Response: This information is discussed in the EA and Wildlife Specialist Report. Population data was updated with the most recent survey data collected by ODFW. Cumulative impacts of the proposed actions are disclosed in the EA (Chapter 3), pages 27-29 and Wildlife Specialist Report on pages 13 and 16-19. This analysis determined that the action alternatives would result in a net reduction in disturbance associated with OHV use. Elimination of cross country travel and providing designated trails and routes (as opposed to OHVs accessing all closed roads) would be responsible for this.

Some comments were related to the effects (direct, indirect, and cumulative) analysis for elk and elk habitat and the adequacy of this analysis.

Comment: *Another issue is disturbance of big game. I have yet to see a deer or elk in any location while I am within earshot of an OHV (21-4), 2-60, 2-57, 1-94*

FS Response: Potential effects to Rocky Mountain elk are disclosed in the EA (Chapter 3, pages 23-29) and Wildlife Specialist Report (pages 11-19). Potential impacts to elk, populations, population viability, and habitat are discussed in these locations. Although the proposed action alternatives would maintain a portion of the closed road system for OHV use and construct new trail (except Alternative 3), there would be a net reduction in the number of miles of road and trail available to OHVs. By reducing disturbance by designating routes and eliminating cross country OHV travel, elk would be less vulnerable to hunting, and have a greater amount of security habitat distant from motorized use. New trail construction generally would not impact overstory vegetation; cover stands would remain cover after trail construction, although these areas may be avoided while OHVs are using trails. Habitat adjacent to these trails would be utilized for foraging when trails are not being used.

Comment: *maintain consistency with the August 2007 Presidential Executive Order to provide quality hunter recreation on public lands by improving elk security throughout the project area, 7-23*

FS Response: All of the action alternatives would address the President's Executive Order by reducing disturbance associated with cross-country OHV use and create security areas (to varying degrees) that are greater than ½ miles from a route open to motorized use. Alternative 3 would create the most acres of security habitat. It would address the concerns of the Oregon department of Fish and Wildlife (maintaining elk on the National Forest System lands during the hunting seasons to provide for hunter accessibility and meeting management/harvest goals) and the President's Executive Order the best when compared to the other Alternatives. Alternative 5 would provide for OHV related recreation on designated trails (closed roads) and new trails and would create the next most acres of security habitat when compared to Alternative 3.

Several comments were received that question the analysis methods used to analyze road densities (1-65, 1-67, 5-41).

Comment: *It is our understanding that road density figures presented in the Draft EA represent only those roads and trails proposed for OHV use, and that the EA does not include, analyze, or disclose the total densities of all currently existent open*

and closed routes not proposed for OHV use but nonetheless present on the landscape (1-65).

FS Response: The scale of the analysis is variable by resource. Several resources (soils, hydrology, and noxious weeds) used all roads (open and closed) to compare effects between alternative 1 and the action alternatives. Road density was used in the wildlife report to assess impacts to elk and gray wolf. Road density is one of the variables used to calculate the Habitat Effectiveness Index for elk. Road densities were also used in assessing the impacts to potential gray wolves. Wolves generally do not set up territories in areas with greater than 1 mile of road per square mile. The existing open road density (all roads considered open due to cross country travel) and post-implementation open road density under all of the action alternatives would be well in excess of 1 mile of road per square mile.

One comment questioned why HEI in the winter range management areas did not change between action alternatives.

Comment: Clearing new trails would affect the quality of existing cover. Why is there no difference between alternatives 2 and 3 for HEI? (2-58)

FS Response: In the winter range management areas, only those roads that are open during the winter use period (Dec 1-April 15) are used in the HEI calculation (Ager, A. and M. Hitchcock. 1992). Under all of the action alternatives, any trails in the winter range management areas that are open to OHVs would be seasonally restricted, and therefore not be open in the winter. Therefore, there would be no difference between alternatives in terms of miles of road open to motorized use during the winter use period. With all of the variables used to calculate HEI (road miles, cover abundance, cover quality) static, the calculated HEI values for the Monument and Kahler Winter Ranges are the same between alternatives. The HEI value for the action alternatives is different than the existing condition/No Action alternative due to the elimination of cross country travel in the action alternatives.

Comment: Impacts of proposed action on wintering elk, riparian, old growth, 5-46

FS Response: Potential impacts (direct, indirect, and cumulative) on elk, the Kahler Basin and Monument Winter Ranges, and old growth (C1 Dedicated Old Growth) are described in the EA (Chapter 3, pages 23-29) and Wildlife Specialist Report (pages 3-9 and 11-19). There would be no new trail construction in the C1 management area. The existing number of miles of closed roads within C1 old growth stands that are accessible to OHVs would be reduced to between zero and .2 miles depending on the alternative. The action alternatives would also reduce disturbance and improve habitat effectiveness in the Kahler Basin and Monument Winter Ranges.

Some commenters felt that the road proximity analysis contained in the Wildlife Specialist Report would be improved by incorporating new science and making the analysis consistent with those of neighboring forests

Comment: Starkey Experiment Forest has shown and ODFW would recommend that a half mile buffer from open road and trails be use in your analysis. (7-7)

FS Response: This comment was noted, and a ½ mile buffer has been applied to elk habitat within the analysis area to identify security areas. The discussion of elk security in the Wildlife Report and EA has also been updated with the results of these changes.

Some commenters provided design suggestions relating to new trail construction that would occur under Alternatives 2, 4, and 5. (7-21, 7-22)

Comment: *The 2400022 trail system should be redesigned to maintain cover and security for big game; 2128 trail system should be redesigned to maintain cover and security for big game, 7-21, 7-22*

FS Response: Alternatives were developed to analyze effects of both of these trails on various resources. Design elements 5, 6, and 7 were incorporated into all alternatives to reduce potential effects to vegetative cover and habitat. The impacts of trail construction are discussed in the EA and Wildlife Specialist Report. During trail layout and construction, the proposed trail paralleling the 24 road to the southwest ("2400022 trail") would be located where it minimizes potential disturbance to elk and other big game (mule deer) and maintains security habitat. Alternative 5 addresses the proposed trail to the west of the 2128 by shortening this trail and reducing potential disturbance. Alternative 2 addresses disturbance to big game by incorporating a seasonal restriction for OHV use. Alternative 3 would not construct this trail.

Several comments were related to the ability of the Alternatives to reduce OHV disturbance and maintain elk on public lands where they can be hunted. (7-2, 7-5, 7-6)

Comment: *The Forest Service needs to eliminate the displacement of elk from public lands which cause private land agricultural damage. Alternative 1 does not address the disturbance from vehicle and OHV use in the project area that is moving the elk off of the public land and onto the surrounding private properties, especially in the Fossil Unit, where very few elk are available for hunters on public land within the project area, 7-2.*

FS Response: All action alternatives would address the concern of disturbance to elk and other big game. As stated in the EA alternative 1 is expected to have little positive impact on elk remaining on Forest. Because cross country travel would be allowed in general forest and is likely to continue in the winter range (where it would be difficult to enforce), security habitat (greater than ½ mile from a route open to motorized use) would continue to be virtually non-existent.

One commenter made reference to seasonal closures of the proposed trail system. This comment suggested alternate closure dates or were in general agreement with existing seasonal closure dates within the analysis area. (7-9, 7-10)

Comment: *Alternative 2.... Should include a seasonal trail closure from Aug 15 to Nov 30 throughout the entire project area to minimize big game disturbance big the hunting seasons; Seasonal closure would allow some recreational use during the summer months, 7-9.*

FS Response: With the exception of the designated trail along the 2128-065 road (closed September 15 through December 1) and the winter range portion of the analysis area, there are no seasonal closures included in the alternatives that address big game hunting season disturbance. Alternatives 3 and 5 eliminate or reduce OHV-related disturbance associated with cross-country travel and use of OHV off of open roads. Alternative 3 has no designated trails and alternative 5 has 26 miles of trail with about 5 miles within the Fossil unit. Measures used in the analysis to depict disturbance to big game includes: HEI and acres of OHV influence within ½ mile of trails and roads.

Wildlife Effects Analysis

Some comments were related to the adequacy of existing conditions and the effects analysis for various wildlife species, including wolverines, lynx, marten, eagles, goshawks, great gray owls, and others. These commenters believe that the proposed activities have the potential to adversely affect these species and their habitat. (1-50, 1-52, and 1-60)

***Comment:** The Draft EA fails to adequately disclose current status information on the species noted below (wolverines, lynx, marten, eagles, goshawks, great gray owls, and others) and other wildlife species that historically have existed, and may presently occur, in the planning area (1-50).*

FS Response: This comment is addressed in Chapter 3, pages 30-35, 37-39, and 43-44 of the EA sent out for comment in December 2008 for the marten, wolverine, bald eagle, and northern goshawk, and in the Wildlife Specialist Report. Existing information on the habitat preferences, status, and presence/absence of these species in the analysis area is included in these portions of the EA and Specialist Report. Cumulative and direct/indirect impacts are also disclosed in this portion of the EA and Specialist Report. The lynx was not fully analyzed for the following reasons: the project area is not within an established Lynx Analysis Unit, no suitable lynx habitat (denning or foraging) is present in the analysis area, and the species is not present in the analysis area or on the Forest. The great gray owl is neither Region 6 Sensitive or ESA listed, and was not raised as a species of concern during scoping. The proposed activities would not impact potential habitat for this species. For these reasons, this species was not analyzed in the EA.

The proposed action alternatives would not convert suitable habitat for the above species to an unsuitable condition, would eliminate disturbance associated with cross country OHV use, and reduce disturbance associated with OHV use of closed roads by designating routes. If these species are present, use of designated trails and routes could cause them to avoid these areas while OHVs pass by; however, these movements are expected to be temporary. When compared to the existing condition, the proposed action alternatives would have a net reduction in potential disturbance associated with motorized routes, and therefore less potential impact on these species than under the existing situation in the analysis area.

Avian species

Comment: *We ask that new impacts to Neotropical songbirds be avoided with this project by not constructing new OHV trails and existing impacts be reduced by closing OHV access to the closed road network., 2-12*

FS Response: The proposed activities would not intentionally take any migratory bird. New trail construction has the potential to impact a small number of birds, and between zero and 120 acres (zero to .13% of the analysis area) of potential migratory bird habitat. This level of impact would not affect populations of migratory birds in the analysis area, and would therefore be consistent with Executive Order 13186. By not allowing travel off of designated new trails, and minimizing tread width, potential impacts to migratory birds along new trails would be minimized, and therefore the proposed action alternatives would be consistent with Executive Order 13186. By eliminating (Alternatives 2, 3, 4, and 5) or reducing (Alternative 1) cross-country travel by OHVs, and reducing the number of miles of closed roads (designated routes) available to OHVs, the proposed alternatives would reduce impacts (direct, indirect, and cumulative) to migratory birds in dry forest, mesic mixed conifer forest, and shrub-steppe habitats, and would therefore also be consistent with the direction provided by EO 13186.

Several comments were related to the bald eagle and other raptors and the sufficiency of effects analysis for these species.

Comment: *The EA violates the NEPA by the lack of meaningful and accurate analysis and requisite meaningful scientific disclosures and conclusions assessing potential adverse impacts to eagles, their nesting territory and prey, from the proposed OHV trail systems (1-99). (1-96)*

FS Response: The potential impacts to eagles and active eagle territories in the analysis area are disclosed in the EA (Chapter 3, pages 37-39) and Wildlife Specialist Report (pages 33-35). Alternative 1 has the greatest potential for OHV use in close proximity to the Dry Creek eagle nest due to the maintenance of cross country travel in the general forest portion of the analysis area, the ambiguous line separating winter range from general forest habitat, and expected cross country OHV use in the winter range. Due to the complete elimination of cross country OHV travel in the action alternatives and the fact that no designated routes would be located in areas in close proximity to the nest, there would be no impact on the bald eagle. All designated routes are located outside the BEMA; the nearest route open to motorized vehicle use (a seasonal road open to all motorized vehicles), would be located approximately 1.25 miles from the nest. Additional discussion was added to the Wildlife Specialist Report.

Comment: *Other raptor species; ranging from hawks, falcons, and owls; are similarly adversely affected by OHV impacts and disturbance. The EA fails to adequately address these significant issues (1-98).*

FS Response: Potential direct, indirect, and cumulative impacts on goshawk are discussed in the EA, Chapter 3, pages 43 and 44 and Wildlife Specialist Report, pages 39 and 40. Other birds of prey (besides the bald eagle) were not analyzed because they are not listed as either Threatened or Endangered or as Sensitive in Region 6, the proposed activities would not alter forest structure or composition, and potential disturbance would be intermittent.

Some comments questioned the appropriateness of designated routes in suitable goshawk habitat and the adequacy of the analysis in regard to goshawk and their habitat.

Comment: *We ask that no OHV trails, existing or new, be designated as open within occupied or historically occupied goshawk territory (both nesting and fledgling areas) (2-44). (2-69, and 2-70)*

FS Response: The potential impacts to goshawk and their habitat are discussed in the EA, Chapter 3, pages 43 and 44, and Wildlife Specialist Report, pages 40-41. The Forest Plan, as amended by the Eastside Screens, does not require that all routes within a goshawk nesting territory be closed; however, it does allow for closures, where appropriate, to protect wildlife resources from disturbance. Elimination of cross country travel under the proposed action alternatives would reduce potential disturbance on goshawk, if present. Trail construction and use of designated routes is not expected to adversely impact this species or viability due to the fact that disturbance would be intermittent and would pass through or by potential habitat quickly. Any movement away from designated routes is expected to be temporary.

Several comments were related to Neotropical migratory birds and the adequacy of the analysis contained in the EA. (1-100, 1-101, 1-102, 1-103)

Comment: *The EA fails to fully and adequately disclose the current population status and trends of native grassland and native forest dependent Neotropical migrant and native avian species within the planning area and adjacent lands. Compliance with both the NFMA and the Migratory Bird Treaty Act requires that all alternatives presented within the EA must be capable of protecting essential nesting and foraging habitat for these many avian species, and of reversing any current downward population trends (1-100).*

FS Response: Potential direct, indirect, and cumulative impacts to avian species are disclosed in the EA, Chapter 3, pages 30, 38-40, 43, 44, and 46-48. Existing habitat abundance, focal species, and trends are addressed in the Wildlife Specialist Report, pages 42-47. Trends at the project area scale were not assessed due to a lack of site specific surveys. Analysis of potential impacts to neotropical migratory birds is done using focal species, which represent larger groups of migratory birds that utilize similar habitats, and focal habitat features. By analyzing impacts to required habitat features, potential impacts to migratory bird species can be determined.

The National Forest Management Act (1976) states that Land Management Plans (Forest Plans) should “provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives, and within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan.” Executive Order 13186 directs executive departments and agencies to take certain actions to implement the Migratory Bird Treaty Act. This Executive Order directs agencies (among other provisions) to support the conservation intent of the migratory bird conventions by integrating bird conservation principles, measures, and practices into agency activities and by avoiding or minimizing, to the extent practicable, adverse impacts on migratory bird resources when conducting agency actions; restore and enhance the habitat of migratory birds, as practicable; prevent or abate the pollution or detrimental alteration of the Environment for the benefit of migratory birds, as practicable;

ensure that environmental analyses of Federal actions required by the NEPA or other established environmental review processes evaluate the effects of actions and agency plans on migratory birds; minimize the intentional take of species of concern by: (i) delineating standards and procedures for such take; and (ii) developing procedures for the review and evaluation of take actions; identify where unintentional take reasonably attributable to agency actions is having, or is likely to have, a measurable negative effect on migratory bird populations; design migratory bird habitat and population conservation principles, measures, and practices, into agency plans and planning processes (natural resource, land management, and environmental quality planning, including, but not limited to, forest and rangeland planning, coastal management planning, watershed planning, etc.) as practicable, and coordinate with other agencies and nonfederal partners in planning efforts. Partners in Flight (PIF) led an effort to complete a series of Bird Conservation Plans for the entire continental United States to address declining population trends in migratory landbirds. These plans (including *The Conservation Strategy for Landbirds in the Northern Rocky Mountains of Eastern Oregon and Washington* (Altman 2000), which was used to guide the analysis in the EA) provide direction for meeting the Migratory Bird Treaty Act and EO 13186.

The proposed activities would not intentionally take any migratory bird. New trail construction has the potential to impact a small number of birds, and between zero and 120 acres (zero to .13% of the analysis area) of potential migratory bird habitat. This level of impact would not affect populations of migratory birds in the analysis area, and would therefore be consistent with Executive Order 13186. By not allowing travel off of designated new trails, and minimizing tread width, potential impacts to migratory birds along new trails would be minimized, and therefore the proposed action alternatives would be consistent with Executive Order 13186. By eliminating (Alternatives 2, 3, 4, and 5) or reducing (Alternative 1) cross-country travel by OHVs, and reducing the number of miles of closed roads (designated routes) available to OHVs, the proposed alternatives would reduce impacts (direct, indirect, and cumulative) to migratory birds in dry forest, mesic mixed conifer forest, and shrub-steppe habitats, and would therefore also be consistent with the direction provided by EO 13186.

Lynx

A number of comments were related to lynx and lynx habitat. Commenters felt that potential direct, indirect, and cumulative impacts on lynx were not adequately addressed in the EA.

Comment: *The proposed OHV systems directly and cumulatively could result in significantly further reducing needed disturbance-free refugia and cover for wildlife, jeopardizing both lynx and their prey species viability across the area—in violation of the NEPA, NFMA, and the ESA, and management recovery objectives for lynx and other species of concern (1-86). 1-85, 1-87., 1-88., 1-89*

FS Response: The project area is not within an established Lynx Analysis Unit. The analysis area does not contain mapped suitable denning or foraging habitat or have sufficient snowpack to support the lynx. Based on the best science available (Ruggiero et al. 2000, Ruediger et al. 2000), the existing vegetation within the analysis area has an inappropriate composition and structure, and therefore does not provide suitable habitat for the lynx. The nearest mapped lynx habitat is located approximately 35 miles east of the analysis area. Suitable habitat on the Umatilla National Forest has been classified as unoccupied mapped lynx habitat. Because the

project area does not contain vegetation with an appropriate composition or structure, scratch pad surveys (1999, 2000, and 2001) designed to detect for the presence of lynx did not occur in the project area. These surveys failed to detect lynx on the Forest. Based on limited historic records of lynx, the lack of reproductive records, and correlations with cyclic lynx populations in Canada, lynx are considered dispersers/transients and not reproducing residents in the Blue Mountains of Oregon (Verts and Carraway 1998, Ruggiero et al. 2000). The lynx is not present in the project area; therefore, there would be no effect on this species. Refer to the Wildlife Specialist Report for details.

American marten

A number of comments were related to the analysis of effects on the American marten and its habitat. Some commenters felt that the analysis did not adequately address the potential impacts associated with designation of routes and trail construction. (1-14, 1-66, 1-68, 2-10, 2-14, 2-61, 2-62, 2-63)

Comment: *American (Pine) Marten There is not sufficient analysis in the EA of the effects of the proposed OHV trail systems on American marten in the planning area. The EA fails to adequately and responsibly address this issue (1-66).*

Comment: *There is inadequate analysis of potential impacts to marten populations and viability, (2-62).*

FS Response: Potential direct, indirect, and cumulative impacts of the proposed alternatives are disclosed in the Draft EA, Chapter 3, pages 30-32 and in the Wildlife Specialist Report, pages 21-23, in accordance with NEPA. NFMA requires the management of wildlife habitat “to maintain viable populations of existing native...vertebrate species in the planning area” (36 CFR §219.19). The proposed action alternatives would not directly impact the marten (if present in the analysis area) or result in reductions in suitable habitat. Implementation of the proposed action alternatives would eliminate cross country OHV travel and designate routes for OHVs. These actions would result in a net reduction in disturbance associated with OHV use in and adjacent to potential habitat (late and old structure) and old growth management areas. For these reasons, there would be no impact on populations (if present) or species viability in the analysis area.

Cumulative effects are discussed in the EA and Wildlife Specialist Report. The proposed Long Prairie Fuels Reduction and past reductions in suitable habitat are discussed in these documents.

There have been no extensive surveys for the pine marten in the analysis area. They are assumed present due to the presence of suitable habitat. By providing suitable late and old structure and mid-seral habitat for the pine marten distributed across the landscape in a manner that maintains connectivity, the viability of this species would be provided for.

Federally Listed Species and Species of Concern

Some commenters believed that the analysis for “species of concern,” Federally listed species, Region 6 Sensitive Species, and connectivity habitat was inadequate. (1-54, 1-56, 1-58, 1-62, 1-64, and 2-71)

Comment: *Under the proposed action and Alternatives 3-5, there are many associated impacts and issues both incrementally and irretrievably affecting the habitat quality and connectivity, and the viability of ESA and state-listed species and regional species of concern that have not been sufficiently disclosed or addressed in the Draft EA. Among these are direct OHV intrusions into and near important hiding and rearing cover and refugia; as well as noise, exhaust, dust, and disturbance extending throughout much of the area's forest habitat (1-58).*

FS Response: The direct, indirect, and cumulative impacts of trail designation, prohibition of cross country travel (under the action alternatives), and new trail construction is analyzed in the EA for Forest Plan MIS, ESA listed and Sensitive species, goshawk, species of interest, and Neotropical migratory birds (Chapter 3, pages 23-48). More in depth analysis of affects is contained in the wildlife specialist report. The effects analysis for these species includes discussion of disturbance and impacts to suitable/potential habitat. The proposed action alternatives would all reduce the existing level of disturbance (under the existing condition cross country travel allowed and closed roads used as trails over the entire area) to some extent, as described in the EA.

No Sensitive or ESA listed species are expected to be displaced by the proposed trail construction and designation activities (see effects analysis in the EA and Wildlife Specialist Report). If a wolverine, which is not known to occur in the analysis area, were to pass through the analysis area, it would likely avoid OHV trails while they are being used; however, disturbance would be intermittent. Potential impacts to gray wolf are discussed in the EA (Chapter 3, pages 40-42) and Wildlife Specialist Report (pages 38 and 39). Potential impacts to connectivity habitat are discussed in the Wildlife Specialist Report, pages 6-9.

Antelope

One comment addressed concerns over pronghorn antelope habitat in the analysis area, and the potential disturbance associated with trail construction along the 24 Road.

Comment: *The area of road 1022 in our experience appears to be a pronghorn fawning area (one of the few places we have been able to witness newborn Pronghorns) and should not have parallel increased OHV disturbance from new connecting trails (2-13).*

FS Response: Currently, the pronghorn is not listed as Threatened, Endangered, or Sensitive in Region 6. It is acknowledged that unique habitats that occur on the Forest may require protection. Efforts will be made to minimize disturbance along this trail by constructing/locating the proposed trail near the 24 Road to concentrate motorized activity that may disturb wildlife.

Gray Wolf and California Wolverine

Some comments were related to large forest carnivores (gray wolf and California wolverine)

Comment: *There have been no thorough surveys of the project area for either species, as tracking surveys have been done largely confined to larger roads. (wolverine and wolves), 2-66*

FS Response: There have been no recent tracking surveys for either species in the analysis area. Tracking surveys are generally restricted to areas where the vegetative composition and structure and spatial distribution of habitat suggests suitability for the species in question. Tracking surveys have generally occurred to the north and east of the analysis area, although sightings or other evidence is investigated when received.

Several comments addressed the effects analysis for the gray wolf. Commenters felt that the analysis was inadequate and needed to be revised. (1-78, 1-80, 1-82, 1-84, 1-95, 2-56, 2-68)

Comment: *The analysis fails to assess the cumulative impacts of OHV trail systems and use in combination with increasing presence of native predators in the greater region, particularly regarding returning wolves. 1-95*

FS Response: Potential direct, indirect, and cumulative impacts of the proposed action alternatives on gray wolf are disclosed in the Draft EA, Chapter 3, pages 40-42 and in the Wildlife Specialist Report, pages 38-39, in accordance with NEPA. NFMA requires the management of wildlife habitat “to maintain viable populations of existing native...vertebrate species in the planning area” (36 CFR §219.19). The gray wolf is not currently known to occur in the analysis area. Varying levels of closed roads would be available to OHVs under Alternatives 2, 4, and 5. There would be a net reduction in the number of miles open to OHV use under the action alternatives (and Alternative 3) when compared to the existing condition, which allows cross country OHV travel. The proposed action alternatives would positively impact potential habitat by reducing disturbance associated with OHVs.

Cumulative impacts of the proposed action alternatives on elk are disclosed in the Draft EA, Chapter 3, pages 27-29 and in the Wildlife Specialist Report, pages 13-19. The proposed action alternatives would reduce disturbance and vulnerability of big game. Gray wolf are not present in the cumulative effects analysis area for big game. Because of this fact, their presence in the northern Blue Mountains was not considered in the cumulative effects analysis for this project.

Elimination of cross country travel and reducing densities of closed roads available to motorized travel (which decreases disturbance) are compatible with wolf recovery. The proposed activities would reduce motorized disturbance and designate routes where it is currently legal to ride cross country; these activities would improve the quality of potential habitat.

Several comments addressed the effects analysis for the wolverine. Commenters felt that the analysis was inadequate and needed to be revised. (1-74, 1-76, 2-64, 2-65, 2-67)

Comment: *The conclusion of no cumulative reduction in suitable habitat is unsupported, as altering of vegetative structure would occur with new trail construction and wolverine are also sensitive to disturbance, 2-67*

FS Response: Potential direct, indirect, and cumulative impacts of the proposed action alternatives are disclosed in the Draft EA, Chapter 3, pages 33-35 and in the Wildlife Specialist Report, pages 28-31. Although suitable habitat (based on vegetative composition and structure) is present in the analysis area, the wolverine is not known to occur in the analysis area. Natal denning habitat is also not present in or near the analysis area. There are no existing laws that require avoidance of suitable, unoccupied wolverine habitat. The NFMA requires the

management of wildlife habitat “to maintain viable populations of existing native...vertebrate species in the planning area” (36 CFR §219.19). The proposed action alternatives would positively impact habitat by reducing disturbance associated with OHVs by designating routes and eliminating cross-country OHV travel. As stated in the effects analysis, trails would be constructed where the least amount of understory clearing would be required. Overstory vegetation would generally not be affected due to the fact that proposed trails would be narrow (50 inch approx tread width). Therefore, there would be no conversion of suitable habitat to an unsuitable condition under any of the action alternatives.

The Oregon Department of Fish and Wildlife (ODFW) was consulted prior to and during the development of the proposed action, and their comments incorporated into alternatives to the proposed action. ODFW did not raise the wolverine as a species of concern within the project area.

Tracking surveys are generally restricted to areas where the vegetative composition and structure and spatial distribution of habitat suggests suitability for the species in question. With respect to wolverine, this would be dense mesic mixed conifer forest and subalpine habitat at higher elevations in close (<10-15 miles) of suitable natal denning habitat. These habitats are not present in the analysis area; it is dominated by broken grassland/shrubland and dry upland forest stands, with smaller patches of mixed conifer habitat. Tracking surveys have generally occurred to the north and east of the analysis area, although sightings or other evidence is investigated when it is received.

Wildlife Disturbance

Some comments were in relation to wildlife harassment and habitat destruction associated with new trails.

Comment: *Harassment of wildlife and disruption of habitat:-----Increased use of ORV's in the Forest and particularly as proposed on specially dedicated "trails" outside of the already extensive primary motorized road system, will indisputably exacerbate human pressures on and destruction of the wildlife and their habitat. , 5-58*

FS Response: The impacts of the proposed activities are disclosed in the EA and Wildlife Specialist Report. Currently, cross-country travel is allowed, and closed roads are being used by OHVs within the analysis area. Under the proposed alternatives, cross country travel would be curtailed or eliminated, and there would be a reduction in the number of miles (closed system roads and new trails) available to OHVs. These proposed activities would reduce harassment and disturbance of wildlife habitat.

Several comments restated the findings of the effects analysis disclosed in the EA (7-1, 7-3, 7-4, 7-8, 7-12, and 7-19).

FS Response: Because these are general comments restating the effects disclosed in the EA, there will be no further response to these comments.

Some commenters expressed a belief that OHV use and management is not compatible with certain management areas in the analysis area (2-45).

Comment: *OHV use is antithetical to the management goals for the above listed management areas (C1, C5, C3, D2, and E1) due to potential and likely wildlife disturbance, 2-45*

FS Response: The Umatilla National Forest Land and Resource Management Plan (Forest Plan, USDA 1990) provides direction concerning what activities and actions are appropriate on the Forest. The Forest Plan states that OHV use is permitted in the C1, C3, C5, and E1 management areas (pages 4-144, 4-152, 4-163, and 4-178). Under the proposed action alternatives, OHV use would not be permitted in the D2 management area allocation.

Comment: *All concerns about wildlife should be addressed in the final decision that gave rise to the design of alt 5, 2-47*

FS Response: The Decision will address all of the factors that contributed to the Decision that is made, including recreation, wildlife resources, water, fish, etc.

Comment: *You have a legal mandate to conserve the full spectrum of animal life on the district not just big game (9-2).*

FS Response: The National Forest Management Act (1976) states that Land Management Plans (Forest Plans) should “provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives, and within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan;” The EA and Wildlife Specialist Report address a number of species and habitats that occur or have a potential to occur in the analysis area, based on the suitability of habitat (as determined by the best science available). The proposed activities would reduce or eliminate direct impacts to wildlife and wildlife habitat and reduce disturbance resulting from OHV use. Refer to the wildlife discussion in the EA and Wildlife Specialist Report.

Comment: *the use of route density standards in the EA does not comport with full disclosure of environmental impacts associated with the project alternatives, including no action (1-40).*

FS Response: Route density is used in the calculation of the Habitat Effectiveness Index (HEI) for elk. HEI was calculated for the E1 West, E1 East, C3 Monument Winter Range, and C3 Kahler Winter Range. Road densities used in the HEI model incorporate only those roads that are open to motorized use, and therefore result in potential disturbance or vulnerability to elk. The spatial distribution of open roads and designated routes and trails was incorporated during alternative development.

Comment: *There should be no steep slopes in OHV routes unless paved or graveled. There should be no route construction in interior closed canopy forest due to fragmentation of already scarce habitat (2-6).*

FS Response: As stated in the design element section of Chapter 2: OHV trails would avoid tight radius curves and steep slopes where possible, would include any needed drainage structures, would follow existing edges and openings and, would minimize trail construction within interior closed canopy forest. If these trails pass through closed canopy forest, they would generally not impact overstory vegetation due to the narrow tread width (approx. 50 inches) of proposed trails. Therefore, there would be no further fragmentation of closed canopy forest.

Comment: *It is our understanding that road density figures presented in the Draft EA represent only those roads and trails proposed for OHV use, and that the EA does not include, analyze, or disclose the total densities of all currently existent open and closed routes not proposed for OHV use but nonetheless present on the landscape (1-65).*

FS Response: The scale of the analysis is variable by resource. Several resources (soils, hydrology, noxious weeds) used all roads to compare effects between alternative 1 and action alternatives. Road density was used in the wildlife report to assess potential impacts to elk and gray wolf. Road density is one of the variables used to calculate the Habitat Effectiveness Index for elk. Road densities were also used in assessing the impacts to potential gray wolves. Wolves generally do not establish territories in areas with greater than 1 mile of open road per square mile. The existing open road density (all roads considered open due to cross country travel) and post-implementation open road density under all of the action alternatives would be well in excess of 1 mile of road per square mile.

Invasive Plants

Comment: *Impacts and issues not sufficiently disclosed or addressed in the Draft EA: OHV use also harms native plant species abundance, distribution, and growth, and introduces and spreads invasive exotic plants (1-43).*

FS Response: OHV use has the potential to introduce and spread noxious weeds under all alternatives. The effects analysis in the noxious weed report and EA outlines what effects each alternative has on the analysis area. Alternatives 2, 3, 4, and 5 eliminate cross country travel and contain OHV use to established roads and trails. Eliminating cross country travel will reduce the probability that non native species will be spread by OHV use to isolated areas away from roads and trails reducing the likelihood of early detection of non desirable species. By designating a trail system for OHV use and eliminating cross country travel the potential for plant disturbance, growth, and introduction of invasive exotic plants is greatly reduced as identified in the biological evaluation for botanical species and Noxious weeds sections of the EA and specialist's reports.

Comment: *Where would the money come from to survey and control invasive plants on a designated trail system, 2-36*

FS Response: Currently, funds that are used to inventory and treat noxious weeds within the

planning area come from program funds and local and private partnership dollars. Treatment and inventory funds can increase and/or decrease annually.

Comment: *We are opposed to use of roads closed to motor vehicles by OHVs as this spreads invasive plants and creates extensive wildlife and public disturbance in areas otherwise more secluded and protected from intrusion (2-37).*

FS Response: The designation of roads closed to motor vehicles to be used as OHV trails are currently used by OHVs throughout the project area. Closed roads to be used as OHV trails were analyzed for effects to both wildlife disturbance and impacts to noxious weed establishment and spread. The analysis found that the scale of disturbance would be greatly reduced from the current level and would vary between alternatives.

Comment: *There is a complete lack of site specific information pertaining to the ecological condition of proposed new trails: Invasive plants that could spread, 2-38*

FS Response: Trails that are to be constructed will be staked out on the ground and the area will be inventoried to see if existing weed populations exist. Any equipment that will be used to construct or maintain new trails systems will adhere to the Prevention Standards found on page 11 of the Pacific Northwest Regional Environmental Impact Statement (Preventing and Managing Invasive Plants) ROD signed October 2005.

Comment: *We remained concerned by the potential for increased invasive plant dispersal from the OHV park from increased designated trail access from the park to the Forest (2-40, 2-48).*

FS Response: The Forest Service is also concerned with the spread of noxious weeds. The Morrow County OHV Park has implemented a prevention plan that involves inventory and treatment as well as informing riders and users about the different weeds that may be found on the OHV Park and the adjacent National Forest System Lands. The OHV Park also has a high pressure washer to be used to clean equipment and OHV's that will be entering the area.

Areas Identified by Oregon Wild as unroaded

Several comments were received that questioned the analysis of areas Oregon Wild has identified as unroaded. (1-4, 1-6, 1-107, 1-108, 1-109, 1-110, 2-8, 2-54, and 5-68,)

Comment: *Proposing open motorized routes within and adjacent to these unroaded areas would compromise unroaded values such as wildlife corridors and habitat, high water quality, refugia of native vegetation, and non-motorized recreation opportunities (1-6).*

FS Response: No new roads are being proposed in any alternatives. All OHV use will be restricted to designated roads or trails. Designated trails are located on existing closed roads, user created trails or in areas bypassing roads where mixed use analysis identified a risk to OHV riders with other motorized use. .

The project relates to OHV use on designated trails and roads and the effects are described in Chapter 3 under each resource including wildlife corridors and habitat, water quality, refugia and non-motorized opportunities. Specific discussion to areas identified by Oregon Wild as unroaded is discussed in Chapter 3, Landscape Characteristics section. As stated in the report titled "Landscape Characteristics" the existing condition of all lands within Oregon Wild's areas of "non-inventoried roadless areas" and affected by the West End OHV project presents a landscape that has been managed and is generally developed in nature. For the reasons described in the report, these lands did not meet the inventory criteria for an area with wilderness potential. Past management and current developed conditions within the project boundary reflect the intent and decisions made in the Forest Plan (1990 as amended) including no impacts to the proposed RNA because no OHV trails would be located within the proposed RNA.

Comment: *we remain opposed to the Forest Service designating as open to OHV use roads and trails that serve to fragment these landscapes. For example, several action alternatives and the proposed action include development of a substantial stretch of designated new year-round trail along the ridge top of the Keith Canyon roadless unit (1-111).*

FS Response: By eliminating cross country OHV use and restricting OHV's to existing roads and trails would increase the naturalness of the area to some extent by reducing the impacts to wildlife, noxious weed spread, soil disturbance, and impacts to riparian vegetation. The trail paralleling Forest Road 24 is partially using a current user-created trail connecting 2 existing roads. A designated trail system and elimination of cross country travel would reduce fragmentation, not create it.

Compliance and Enforcement, Monitoring and Maintenance

Several comments were received that questioned how the Forest Service would initiate compliance and enforcement for the project area. (1-71, 1-73, 1-77, 1-79, 5-65, 6-12, 6-20)

Comment: *The Draft EA also fails to disclose information about monitoring that would be implementing in the field to track compliance with the designated route system, including methods of monitoring to identify early warning signs of resource impacts and conflicts before irreversible damage occurs (1-77).*

FS Response: Closed roads not identified as OHV trails in this project are not identified as surplus routes and may be used for administrative purpose. Compliance of OHV use on the designated trail system includes monitoring, education, and enforcement and is discussed in the EA.

Comment: *Regarding trails proposed for designation on closed roads, why were the roads closed? How does increased OHV use affect this closure purpose (2-53).*

FS Response: The closure of roads to vehicle traffic was done under the 1992 Access and Travel Management Decision and EA. Roads were closed for various reasons including, resource concerns, access needs, and to reduce overall road maintenance cost. The affect of designating OHV routes on roads closed in the 1992 Access and Travel Management Decision and EA are disclosed in Chapter 3 of the West End OHV EA.

Comments were received that identified concerns of how the OHV trail designation would be enforced and the effects of non-compliance. (1-104, 1-105, 1-106, 5-64, 6-14, 6-15, 6-16, 6-17, 6-18, 9-8, 9-9, 9-10, 19-2, 19-6, 19-7).

Comment: *How are you going to keep driver from simply riding over a berm and continuing on closed roads or cutting off the road and meandering at will over the countryside (9-9).*

FS Response: Compliance and enforcement on National Forest lands will always be a concern to many people and the trail system for OHV use is included in this concern. The Monitoring and Compliance section in Chapter 3 of the EA describes the steps that would be taken to continue interaction between users of the project area and enforcement officials in order to help mitigate compliance issues.

Other comments expressed concerns of how the OHV trail system would be designated on the ground. (6-10, 21-8)

Comment: *Potential on the ground delineation measures should be described (6-10).*

FS Response: All roads or areas would be closed unless they are posted as open. This would be much easier to understand and enforce than the current system which is open unless posted closed.

Several comments were received that believed the cost of implementing, monitoring, and enforcing compliance of the alternatives would not be feasible. (1-75, 1-81, 1-83, 2-50, 2-51, 5-52, 5-56, 5-67, 6-19, 9-5)

Comment: *The Draft EA lacks any meaningful discussion of its ability to implement, monitor and enforce compliance with the proposed route system. Nor is mention made of current challenges associated with monitoring and enforcing rider compliance on the hundreds of miles of designated motorized routes located within other portions of the Heppner RD, within other ranger districts on the Umatilla National Forest or neighboring Wallowa-Whitman National Forest, or on lands located immediately east of the West-End OHV Plan area that are managed by the BLM, 1-75*

FS Response: Budgets are allocated annually and vary. Current trends show an increase in recreation budgets but this is not expected to drive the implantation of the OHV project route designation. The EA estimates the annual maintenance costs based on past years experience throughout the Umatilla National Forest. Monitoring and enforcement are ongoing by all employees as well as a more formalized approach through specific locations, dates and personal. As discussed in Chapter 3 of the EA; implementation, monitoring and enforcement are occurring under the current OHV system and will continue under the new route designated system.

