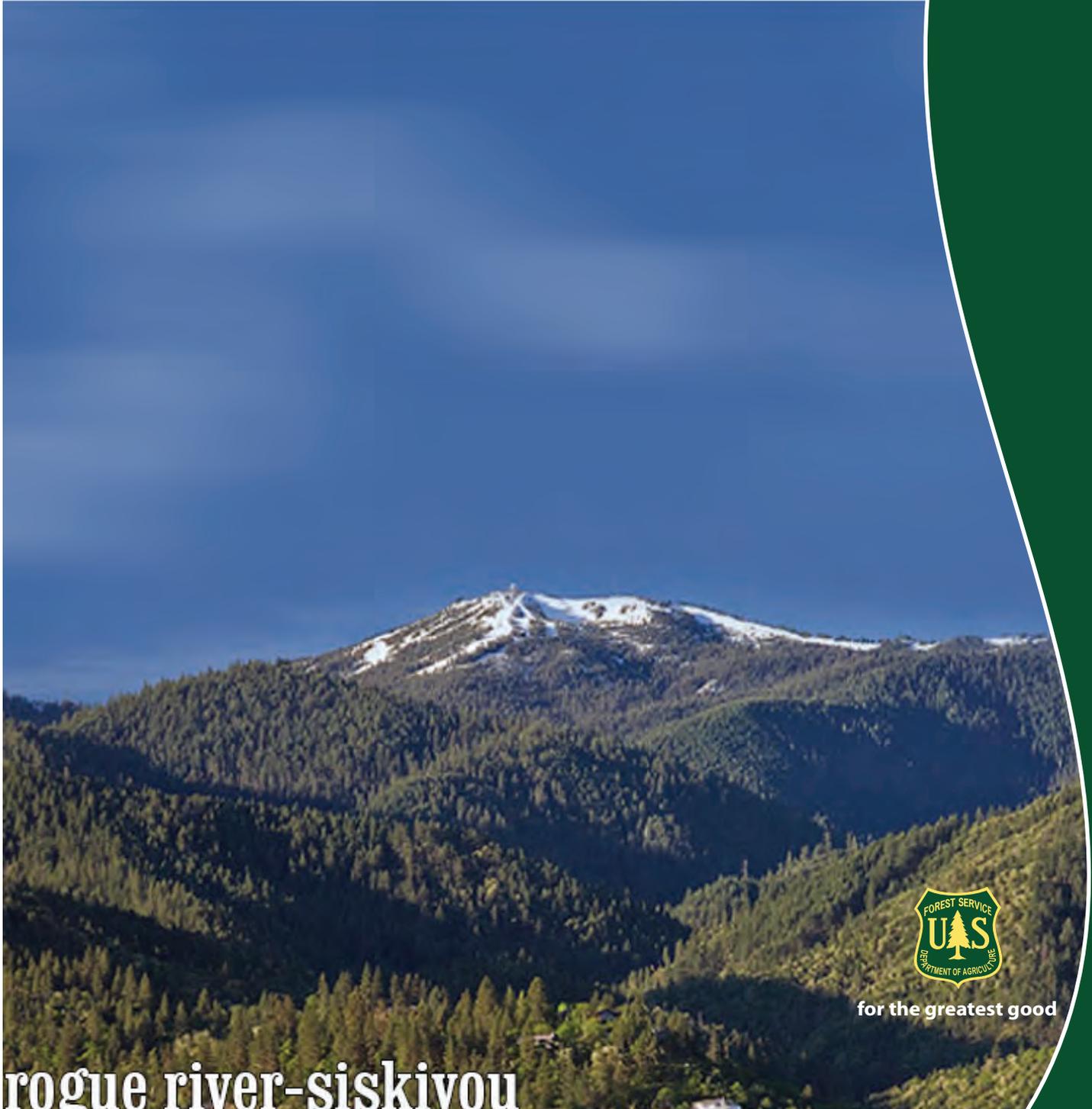




United States Department of Agriculture

Ashland Trails Project

**Draft Decision Notice and Finding of No Significant Impact - Siskiyou Mountains Ranger District
Jackson County, Oregon**



for the greatest good

**rogue river-siskiyou
NATIONAL FOREST**

September
2015

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INTRODUCTION AND BACKGROUND

This Decision Notice documents my decision and rationale for the selection and modification of Alternative 3 of the Ashland Trails Project Environmental Assessment (EA). The Modified Alternative 3 of the Ashland Trails Project will provide approximately 24.9 miles of non-motorized trails in the vicinity of Ashland, Oregon and will close and rehabilitate 9.9 miles of existing unapproved trails to minimize impacts to natural resources.

Opportunity to comment on the EA was provided December 29, 2014 through February 6, 2015. All comments submitted during the comment period for the EA and throughout the planning process have been considered and evaluated.

The Ashland Trails Project is located on the Siskiyou Mountains Ranger District on the Rogue River-Siskiyou National Forest south of the City of Ashland. The action area is generally bound on the north by the City of Ashland; on the east and south by the Forest boundary, with the majority of the trail system proposed to the west and downslope of Forest Service Road 2080; and on the west by the Ashland Municipal Watershed boundary. About 1,200 feet of the 3.2 mile Split Rock trail is located within the Klamath National Forest boundary.

DECISION

It is my decision to implement a modified version of Alternative 3 as described below. I believe this decision best addresses the purpose and need for the proposed action in consideration of the comments received on the EA. This alternative will reduce user conflict through trail design, use designation, and management. Modified Alternative 3 will also provide an adequate and sustainable trail system that minimizes impacts to soil, water, cultural, vegetation, and wildlife resources and discourages unauthorized trail proliferation. The reasons for this decision are specifically provided in the section below *Rationale for the Decision*.

DESCRIPTION OF SELECTED ALTERNATIVE

Table 1 summarizes the modifications to the Managed Uses in Alternative 3 that are reflected in this decision. These changes to the Managed Uses were based on public comments and input gathered from the public meeting held in Ashland on January 8, 2015 and are implemented to further reduce user conflict by separating user groups.

Table 1- Trail Managed Uses - Modified Alternative 3

<i>Trail Name</i>	<i>Length (miles)</i>	<i>Managed Use Under Alternative 3</i>	<i>Managed Use Under Modified Alternative 3</i>
Wagner Glade	2.2	Hiker/Pedestrian, Bicycle, Equestrian	Hiker/Pedestrian
Split Rock	3.2	Hiker/Pedestrian, Bicycle, Equestrian	Trail will remain available for dispersed Hiker/ Pedestrian use but will be managed as a Class 1 Trail.
Caterpillar	0.5	Hiker/Pedestrian, Bicycle, Equestrian	Hiker/Pedestrian, Equestrian

<i>Trail Name</i>	<i>Length (miles)</i>	<i>Managed Use Under Alternative 3</i>	<i>Managed Use Under Modified Alternative 3</i>
Alice in Wonderland	0.2	Bicycle	Hiker/Pedestrian, Bicycle, Equestrian
Jabberwocky	1.7	Hiker/Pedestrian, Bicycle	Bicycle
Wonder	1.3	Hiker/Pedestrian, Bicycle	Hiker/Pedestrian, Bicycle, Equestrian
Not Stirred	0.3	Hiker/Pedestrian, Bicycle	Hiker/Pedestrian, Bicycle, Equestrian
Upper Missing Link	1.2	Hiker/Pedestrian, Bicycle	Bicycle
Lower Missing Link	1.0	Hiker/Pedestrian, Bicycle	Bicycle

¹ See *Construction Specifics* below for discussion of how various trail classes are developed and maintained.

Table 2 summarizes the trail network and the Managed Uses associated with each trail in Modified Alternative 3.

Table 2- Trail Network- Modified Alternative 3

<i>Trail Name</i>	<i>Length (miles)</i>	<i>Managed Use</i>
Alice in Wonderland	0.2	Hiker/Pedestrian, Bicycle, Equestrian
Upper Time Warp	3.4	Bicycle
Wagner Glade	2.2	Hiker/Pedestrian
Split Rock	3.2	Hiker/Pedestrian
Lower Marty's	0.5	Hiker/Pedestrian, Bicycle
Jabberwocky	1.7	Bicycle
Fell on Knee	1.0	Hiker/Pedestrian, Bicycle
Upper Missing Link	1.2	Bicycle
Lower Missing Link	1.0	Bicycle
No Candies	2.5	Hiker/Pedestrian, Bicycle
Upper Eastview	1.3	Hiker/Pedestrian, Bicycle, Equestrian
Ric's	1.3	Hiker/Pedestrian, Equestrian
Wonder	1.3	Hiker/Pedestrian, Bicycle, Equestrian
Red Queen	1.2	Hiker/Pedestrian, Equestrian
Lewis Loop	1.1	Hiker/Pedestrian, Equestrian
Shaken	0.7	Hiker/Pedestrian, Bicycle, Equestrian
Not Stirred	0.3	Hiker/Pedestrian, Bicycle, Equestrian
Lizard	0.4	Bicycle

<i>Trail Name</i>	<i>Length (miles)</i>	<i>Managed Use</i>
Bandersnatch	0.4	Hiker/Pedestrian, Equestrian
TOTAL	24.9	

Under Modified Alternative 3, the Rogue River-Siskiyou National Forest will incorporate approximately 24.9 miles of trails into the approved trail network in the action area, including 17.5 miles of existing historic and unapproved trails and 7.4 of new trails. These trails, along with the current System Trails, will be clearly marked to reflect what uses are permitted on each trail. In the eastside of the action area where use is highest and where conflict is greatest, effort was made to separate user groups as much as possible. On the westside of the action area and on trails that are further from the City of Ashland where use is much lower, multi-use trails will be developed to disperse use over a greater geographic area, thereby lessening trail use density and contact with other users.

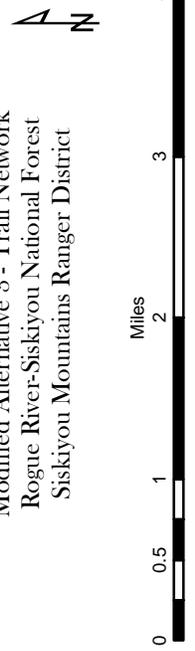
In addition, approximately 9.9 miles of existing unapproved trails that were identified by the interdisciplinary team as not sustainable (i.e., use is resulting in unacceptable adverse impacts to soil, water, cultural, vegetation, and wildlife resources) will be decommissioned.

Table 3- Decommissioned Trails

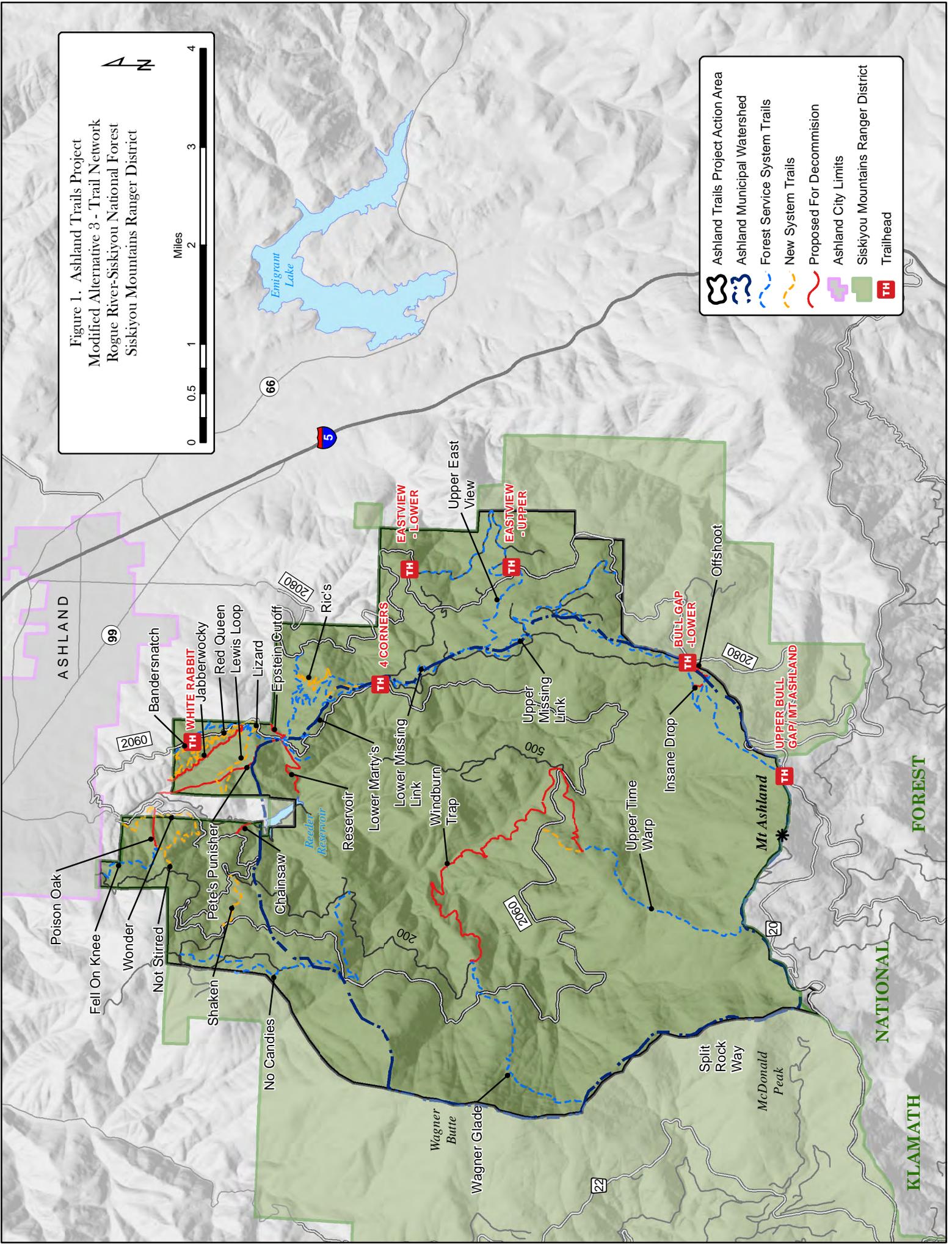
<i>Trail Name</i>	<i>Length (miles)</i>
Alice in Wonderland	0.2
Upper Time Warp	1.0
Winburn Trap	3.7
Lower Marty's	0.4
Jabberwocky	1.2
Chain Saw	0.2
Epstein Cut-Off	0.3
Insane Drop	0.1
Offshoot	0.3
Pete's Punisher	1.3
Poison Oak	0.3
Reservoir (East Fork)	0.9
TOTAL	9.9

Modified Alternative 3 (Figure 1) best meets the need to provide a sustainable non-motorized trail system in the vicinity of Ashland; commensurate with current public demand, and consistent with natural resource management responsibilities and Forest Service capabilities.

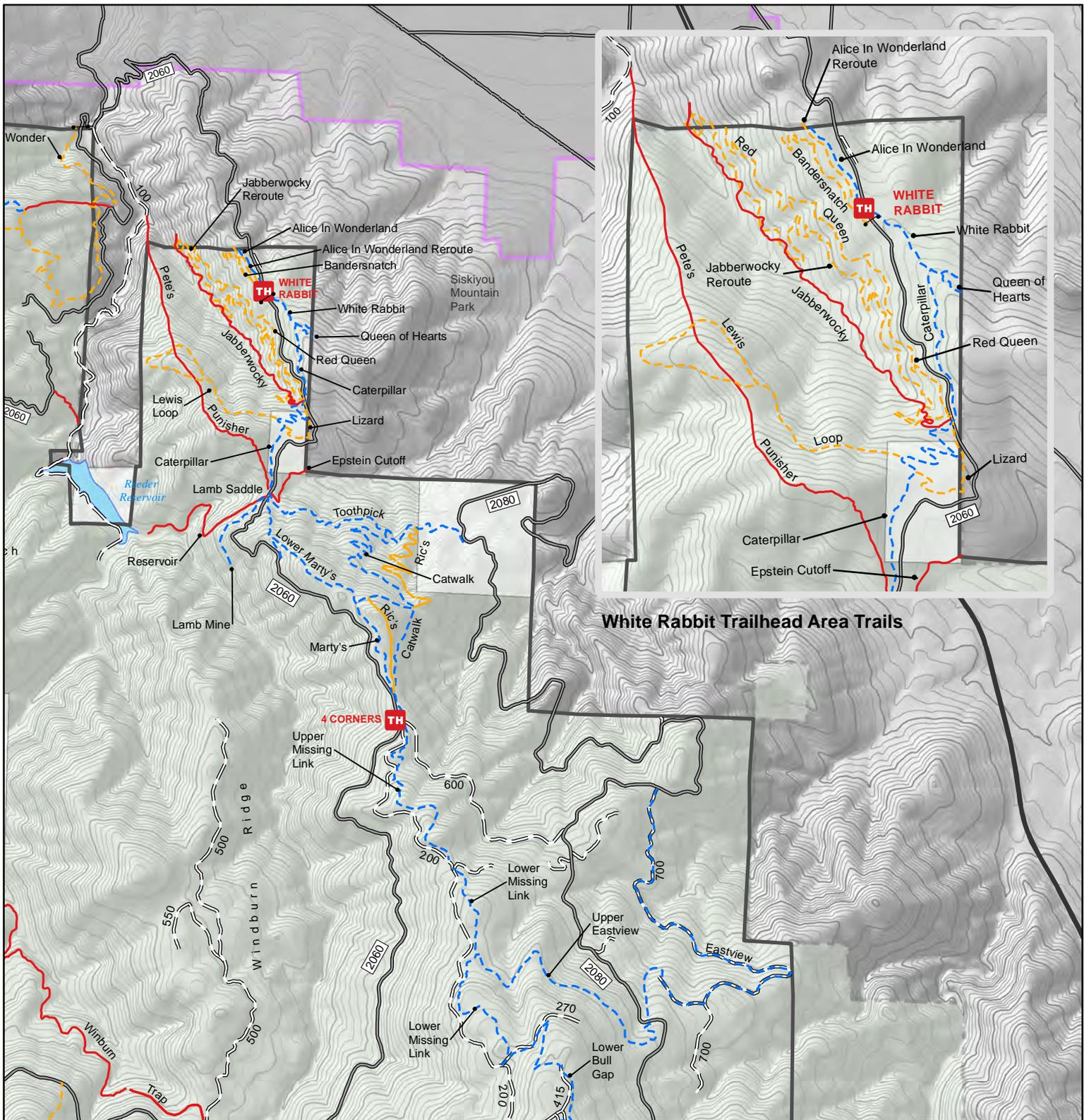
Figure 1. Ashland Trails Project
 Modified Alternative 3 - Trail Network
 Rogue River-Siskiyou National Forest
 Siskiyou Mountains Ranger District



- Ashland Trails Project Action Area
- Ashland Municipal Watershed
- Forest Service System Trails
- New System Trails
- Proposed For Decommission
- Ashland City Limits
- Siskiyou Mountains Ranger District
- Trailhead



NATIONAL FOREST
 KLAMATH

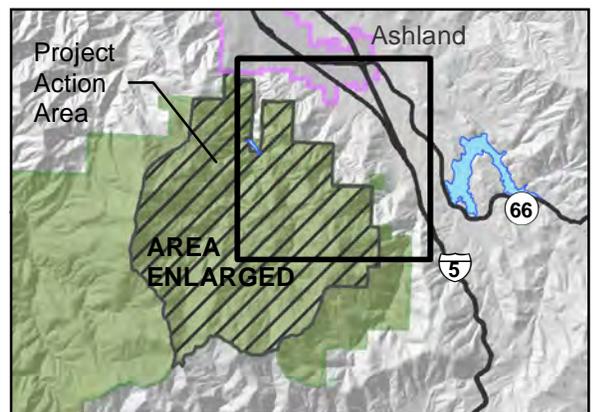


White Rabbit Trailhead Area Trails

Figure 2. Trail Detail
Modified Alternative 3
Lower Eastside

-  Gate
-  Trailhead
-  Forest Service System Trails
-  New System Trails
-  Proposed For Decommission
-  Siskiyou Mountains Ranger District
-  Other Land, Including Private

Feet
0 1,000 2,000 3,000 4,000 5,000



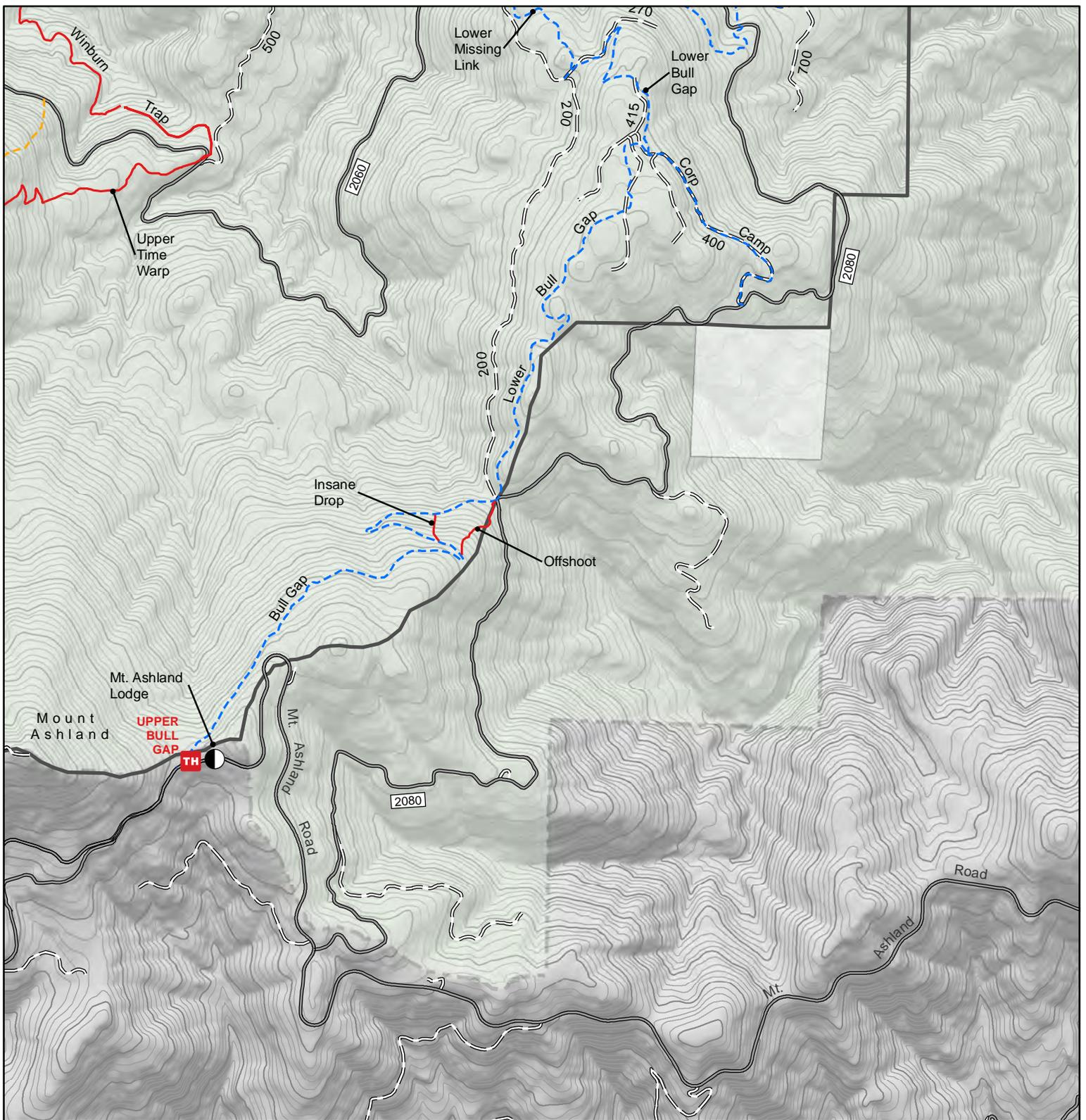
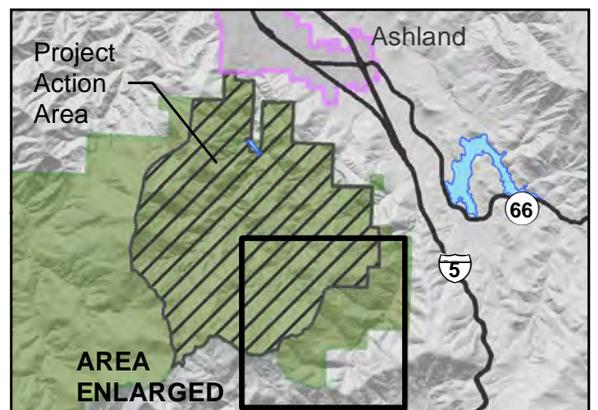


Figure 3. Trail Detail
Modified Alternative 3
Upper Eastside



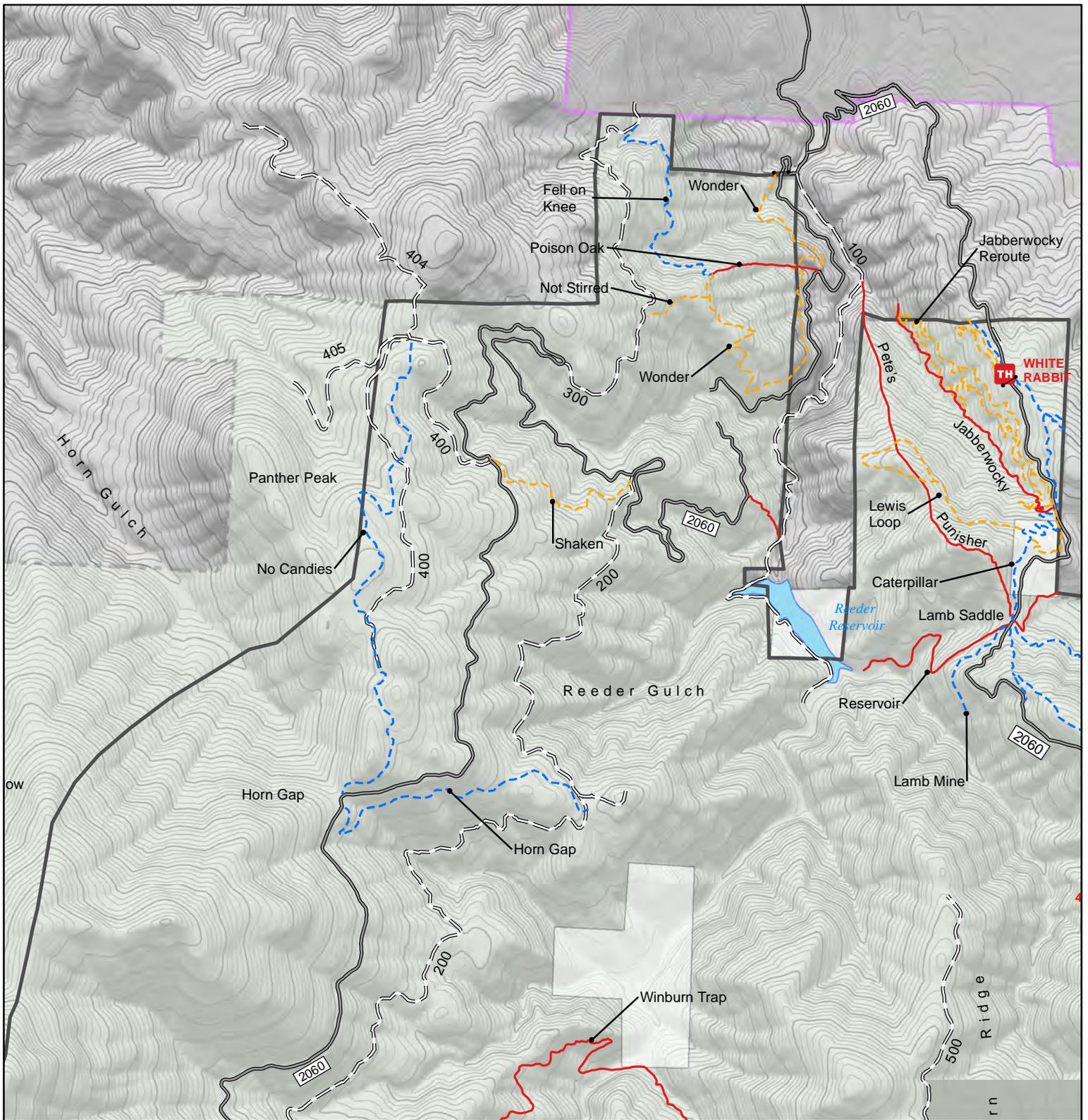
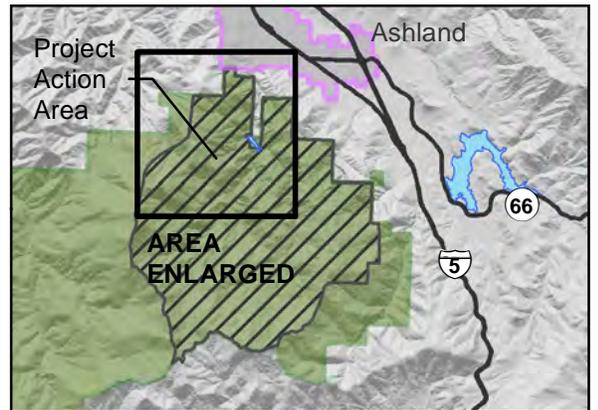
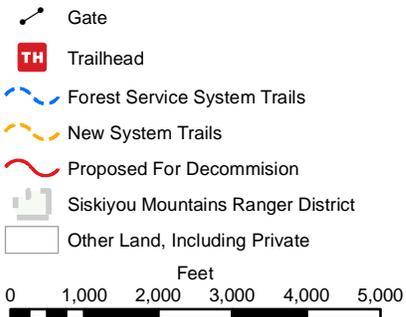


Figure 4. Trail Detail
Modified Alternative 3
Lower Westside



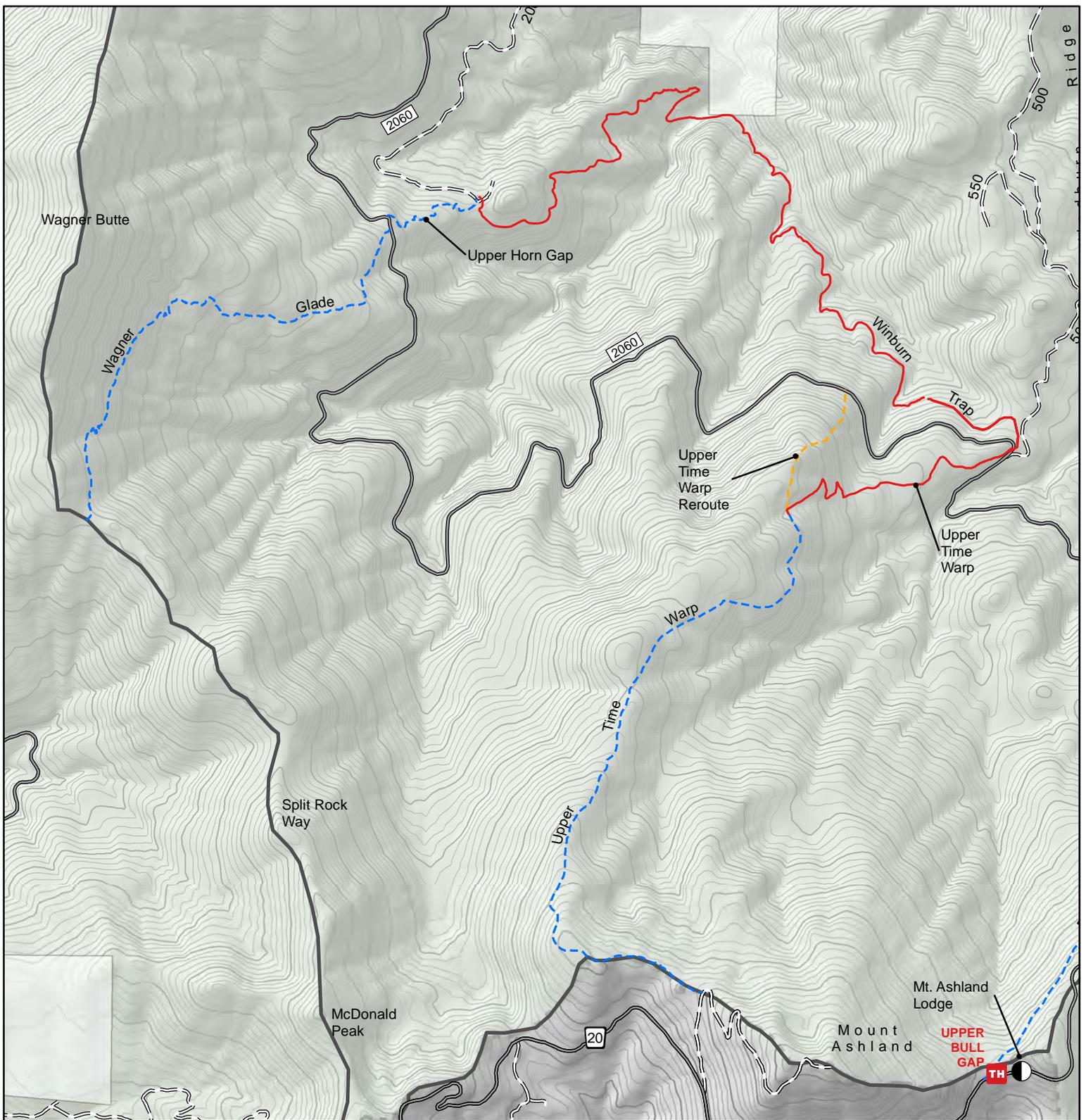
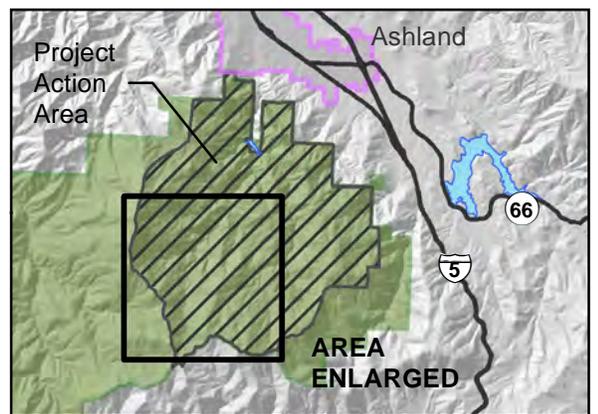
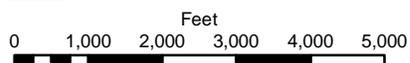


Figure 5. Trail Detail
Modified Alternative 3
Upper Westside

- TH Trailhead
- Forest Service System Trails
- New System Trails
- Proposed For Decommission
- Siskiyou Mountains Ranger District
- Other Land, Including Private



CONSTRUCTION SPECIFICS

The Split Rock trail will essentially remain in its current condition and it will be designated as a Class 1 Trail. Any maintenance that occurs on the Split Rock trail will follow the specifications for a Class 1 Trail in the *Trails Management Handbook*, Forest Service Handbook (FSH) 2309.18. All the other trails in the Ashland Trails Project, including new trails and reroutes, will be constructed and maintained in accordance with specifications for Class 2 Trails:

- Tread Width. Class 1 Trail tread width is 0 to 12 inches. For Class 2 Trails, recommended design tread widths for single-width trails range from 6 to 60 inches, depending on designed use and site specific conditions (e.g., slopes, proximity of precipices). The maximum width for the majority of trails is not predicted to be over 24 inches, but depending on sight, distances and terrain up to 48 inches may be needed.
- Clearing Limit. Class 1 Trail clearing height is 6 feet and clearing width is 24 inches, though some vegetation may encroach into the clearing area. For Class 2 Trails, recommended clearing heights range from 6 to 10 feet and clearing widths range from 24 to 72 inches, depending on designed use (larger widths and heights are generally provided to accommodate pack animals). The maximum clearing height and width will be 10 feet and 72 inches (6 feet), respectively.
- Trail Target Grade. Class 1 Trail target grade ranges from 5% to 25%. For Class 2 Trails, recommended target grades range from 5% to 20%, and the short pitch maximum ranges from 25% to 30%, depending on designed use. The trail target grade is assumed to be 10% and the short pitch maximum is assumed to be 25%.
- Surface Material. All proposed trails in the action area will be constructed of native surface materials (e.g., soil, rock, other naturally occurring materials).
- Trail Slope Alignment. Trail slope alignments less than 45 degrees will be avoided to the extent practicable. Additional erosion control structures (e.g., waterbars or check dams) may be required where trail slope alignment angles are less than 45 degrees.

RATIONALE FOR THE DECISION

I have decided to implement a modified version of Alternative 3 in this decision because the incorporated changes better meet the project's purpose and need. This decision is based on my review of the analysis presented in the Ashland Trails Project EA, comments received during scoping, comments received during the comment period that lasted from December 29, 2014 to February 6, 2015, and from input that was gathered at a public meeting held in Ashland on January 8, 2015.

Changes to managed uses in Modified Alternative 3 were made for a variety of reasons specific to each trail segment as described below:

Wagner Glade trail - because the Wagner Butte trail and the Split Rock trail are not open to bicycles or equestrians, the Wagner Glade trail will only be open to hikers/pedestrians.

Split Rock trail - will be managed as a Class 1 Trail and will be open to hikers and pedestrians, and closed to equestrians and bicycles. For the most part, the Split Rock trail will remain in its current state being indistinct, unimproved, with fallen logs and other obstacles, and generally difficult to follow. Two short segments (measuring approximately 100 yards and 300 yards) will be clearly routed and improved to avoid Howell's tauschia, a globally rare plant that is vulnerable to recreation impacts along the ridge. As a Class 1 Trail, the Split Rock trail will resemble more of a "route" or a "way" than an actual trail, providing a semi-cross-country rugged experience for those seeking a more natural environment than is likely to be found on other system trails.

Caterpillar trail - bicycle use is eliminated on the Caterpillar trail from the junction with the Lizard trail, to the junction with Forest Road 2060. This modification will provide equestrian users a route void of bicycles, as was requested in the comments to the draft EA and from comments received during the public meeting.

Alice in Wonderland trail - the 0.2 mile reroute will remain open to all non-motorized uses (hiker/pedestrian, equestrian and bicycles), consistent with use on the rest of the Alice in Wonderland trail.

Jabberwocky, Upper and Lower Missing Links trails - will be managed for bicycle use and not recommended for hiker/pedestrian users due to limited site distances, and in order to reduce potential user conflicts.

Wonder trail - will be designated as a one-way directional trail (uphill), open to all non-motorized uses (hiker/pedestrian, equestrian and bicycles) to the junction with the Not Stirred and Fell on Knee trails to reduce the potential for user conflict from downhill use.

Lastly, the Not Stirred trail will be open to equestrians to provide a connecting route for equestrians from the Wonder trail to Road 2060-300.

In selecting and modifying Alternative 3, I have carefully reviewed disclosures in Chapter 3 of the EA. The analysis discloses predicted environmental consequences of the actions, including effects to water resources, wildlife and wildlife habitat, soils and geology, aquatic species, botanical resources, non-native invasive plants, Inventoried Roadless Areas, cultural resources and fire risk. My conclusions are based on a review of the entire project record.

MODIFIED ALTERNATIVE 3 RESPONSE TO THE PURPOSE AND NEED

The need for this project is to provide a sustainable non-motorized trail system in the vicinity of Ashland commensurate with current public demand, and consistent with natural resource management responsibilities and Forest Service capabilities, that reduces user conflict through trail design, use designation, and management. The purpose of the action is to provide an adequate and sustainable trail system that minimizes impacts to soil, water, cultural, vegetation, and wildlife resources and discourages unauthorized trail proliferation.

The following considers how well Modified Alternative 3 addresses each of the following four recreation-related elements of the purpose and need statement for the proposed action.

- To provide a sustainable non-motorized trail system. This relates to the proposed design and maintenance of the trail system.
- To provide a trail system commensurate with public demand. This relates to current use levels and locations.
- To reduce user conflict. This relates to user conflict and how conflicts may change under Modified Alternative 3.
- To reduce unapproved trail proliferation. This relates to the past, ongoing, and anticipated future proliferation of unapproved trail construction in the action area under Modified Alternative 3.

Provide a Sustainable Non-Motorized Trail System

Modified Alternative 3 will address this element of the purpose and need statement through decommissioning 9.9 miles of existing historic and existing unapproved, poorly designed and unmaintained trails; incorporating existing historic and existing unapproved trails into the approved Forest Service trail system to allow for additional authorized trails and needed maintenance; and by designing all newly proposed and existing trails to standards that allow them to be sustainably managed over time.

Provide a Trail System Commensurate with Current Public Demand

One measure of the ability of a trail system to meet public demand is total trail miles. Currently, there is 15.8 miles of System Trails in the action area. Modified Alternative 3 will add an additional 24.9 miles of trails, for a total of 40.7 miles of System Trails in the action area. This more than doubles the current trail system and will meet the estimated ongoing and future public demand.

Reduce User Conflict

Modified Alternative 3 will spread users over a greater geographic area than the current System Trails, thereby lessening trail use density and contact with other users, and will limit allowed uses on some trails to reduce the potential for user conflict. Trails will also be signed with uses that are excluded, and all multi-use trails will be signed with trail etiquette guidelines to reduce user conflict.

Reduce Unapproved Trail Proliferation

Proper trail design and use designation will lessen the likelihood of new construction and will simplify enforcement efforts within the action area. The addition of 24.9 miles of new System Trails under Modified Alternative 3, and the separation of managed uses in high use areas, will better meet public demand and improve recreational experiences, which will also lessen the probability of trail proliferation. Although none of the alternatives would eliminate the potential for unapproved trail construction, modified Alternative 3 addresses the root causes - over use and user conflicts – that drive the creation of many non-System trails.

MODIFIED ALTERNATIVE 3 RESPONDING TO THE RELEVANT ISSUES

Issues and concerns were raised by the public and Interdisciplinary Team members during the development of this project. In response, the EA (Section 1.8.1, page 1-17) identified four relevant issues: 1) *potential effects on water quality due to erosion and sediment delivery*, 2) *potential effects on late-successional reserves (LSR)*, 3) *potential effects to northern spotted owls and their habitat*, and 4) *potential effects on Pacific fisher and their habitat*.

The following further describes my rationale for selecting Modified Alternative 3, and the response of my decision to these issues, based on my weighing of the pros and cons of each alternative considered in detail. My decision is based on components that were analyzed in the EA, primarily those associated with Alternative 3. My decision modifies the extent of consequences predicted for Alternative 3. The overall effect of my decision to select and implement a Modified Alternative 3 will result in effects that are equal to or less than those described for Alternative 3 in the EA.

Relevant Issue 1: Potential effects on water quality due to erosion and sediment delivery

Detailed discussions about this relevant issue can be found in EA Section 3.3.1, pages 3-16 to 3-38.

New trail construction under Modified Alternative 3 will require eight new stream crossings (5 fewer than the Alternative 2 and the same as Alternative 3), all of which will occur over intermittent streams. Trail decommissioning under this modified alternative will remove 12 crossings (including four on perennial streams), which will be seven more than Alternative 2 and the same as Alternative 3 and will result in a net decrease of four stream crossings in the action area. All new and previously unapproved stream crossings added to the system under Modified Alternative 3 will be designed to reduce sediment discharge potential, which could reduce load allocations to streams compared to Alternative 1.

The results of the Water Erosion Prediction Project (WEPP) model predicted a net decrease in annual sediment delivery of 12% under Modified Alternative 3 compared to Alternative 1. This decrease will move the Ashland watershed towards meeting the total maximum daily load (TMDL) target for reduced sediment loading, and will represent an improvement compared to both Alternative 1 and Alternative 2.

Similar to Alternative 3, Modified Alternative 3 will have only minor effects on water quality in the analysis area, including impacts to the City's domestic water source. In areas where previously unapproved trails cross streams, water quality conditions may improve slightly because these crossings will be designed and maintained in accordance with Forest Service guidelines. As a result, the effects of Modified Alternative 3 on the quality of the City's domestic water source will be minimal, and may be slightly reduced compared to Alternatives 1 and 2 (because the number of perennial stream crossings will be reduced).

Relevant Issue 2: Potential effects on late-successional reserves (LSR)

Detailed discussions about this relevant issue can be found in EA Section 3.3.2, pages 3-39 to 3-52.

Modified Alternative 3 will result in authorization of 24.9 miles of new System Trails, including 9.2 miles of existing unapproved trails, 8.3 miles of existing historic trails, and 7.4 miles of newly constructed trails, and will decommission 9.9 miles of existing unsustainable or undesirable trails in the action area. Many of the existing unapproved trails and portions of those proposed for new construction (e.g., Shaken) exist as old logging roads or fire lines. These trails account for approximately 12.5 acres (6 foot trail clearance) of existing habitat already modified within the LSR to some degree. New trail construction, in large part intended to re-route existing unapproved or historic trails to minimize resource damage (e.g., Upper Time Warp, Red Queen, Jabberwocky, Alice in Wonderland), will impact approximately 5.4 acres. Trail decommissioning will impact 7.2 acres. In total, Modified Alternative 3 will result in a net decrease of 1.8 acres of long-term habitat modification.

Trail densities under Modified Alternative 3 will be range from 0.04 to 1.5 miles per square mile within the five affected watersheds.

Minimal vegetation removal will be required for new trail construction (limited to 6 foot clearance width), and large down wood greater than 6 inches diameter-at-breast height (dbh) will be avoided during trail layout and construction where possible (although, over time, trail maintenance may require that sections of fallen trees be removed from the width of the trail tread and placed to the side of the trail). The impact of habitats modified by trail construction will most directly affect late-successional habitat-related small mammals, birds, and invertebrates associated with understory vegetation and the forest floor. As described in the analysis of effects for Alternative 3, the total amount of trail clearance under Modified Alternative 3 will occur within less than 0.1% of the entire northern portion of the LSR.

Modified Alternative 3 will include the existing 543 acres of disturbance associated with exiting unapproved and historic trails in the action area. New trail construction will result in an additional 76 acres of disturbance, although the effects of this disturbance will be reduced during trail decommissioning activities (which will affect 235 acres). In total, Modified Alternative 3 will result in 384 acres of long-term disturbance (or approximately 7% of late-successional and large mid-successional habitat within the Rogue River-Siskiyou National Forest portion of the LSR and less than 4% of the late-successional habitat in the entire LSR). This disturbance will be less than the 711 acres of disturbance associate with Alternative 1, 784 acres of disturbance under Alternative 2 and 552 acres of disturbance under Alternative 3.

Modified Alternative 3 addresses existing resource damage and disturbance to late-successional species by re-routing trails to locations with less or no impact, and rehabilitating or closing problem trail segments. The mileage of trails that will be decommissioned under this alternative will reduce the overall amount of disturbance within the LSR when compared to Alternatives 1, 2 and 3. For these reasons, the effects of Modified Alternative 3 are expected to be neutral to LSR values.

Relevant Issue 3: Potential effects on northern spotted owls and their habitat

Detailed discussions about this relevant issue can be found in EA Section 3.3.3, pages 3-52 to 3-69.

Modified Alternative 3 will result in minimal direct impacts to northern spotted owl habitat. The Winburn Trap trail will not be authorized for recreational use under this alternative, which will remove ongoing disturbance to known owl nest sites in the vicinity and reduce impacts to spotted owls compared to Alternatives 1 and 2.

As with Alternative 3, considering trail decommissioning, there will be no net increase in trail mileage from new construction or authorization of existing trails within any owl home ranges under Modified Alternative 3. Decommissioning of the Winburn Trap trail will occur within the Lightning Strike and Ski core areas. Authorization of the historic Wagner Glade trail will include 0.3 miles in the Lightning Strike core area. The 0.5 mile of new construction in the Ski core area will be associated with the proposed reroute of a 0.4 mile portion of the historic Upper Time Warp trail to be decommissioned in the Ski nest patch. Existing nesting, roosting, and foraging (NRF) and dispersal habitat that overlaps new trail construction will be maintained.

Modified Alternative 3 will remove potential disturbance within the nest patches of all known owl sites and result in no net increase in disturbance within core areas, except for a very small amount within the Lightning Strike core area. At the home range scale, the mileage and acreage of trails to be decommissioned under Modified Alternative 3 will result in a reduction in disturbance for all affected owl sites. As a result, the direct and indirect effects of Modified Alternative 3 on spotted owls and their prey will be neutral and potentially beneficial, with an overall reduction in the amount of habitat disturbance from recreational use.

Because the effects of Modified Alternative 3 are similar or slightly less than Alternative 3 through the reduction of overall trail mileage, it is anticipated that Modified Alternative 3 “may affect and is not likely to adversely affect” northern spotted owls because habitat will be maintained by new trail construction and there will be no net gain (and in some cases a reduction in disturbance acres) for all spotted owl home ranges, core areas and nest patches. This finding is consistent with the Letter of Concurrence (LOC) provided by the U.S. Fish and Wildlife Service (USFWS) for the proposed action.

Relevant Issue 4: Potential effects on Pacific fisher and their habitat

Detailed discussions about this relevant issue can be found in EA Section 3.3.4, pages 3-69 to 3-78.

Trail clearance under Modified Alternative 3 will involve approximately 4.1 acres of denning/resting habitat and 8.1 acres of foraging/dispersal habitat for fishers within the action area. New trail construction and the incorporation of existing historic and unapproved trails as System Trails under this alternative will require very little vegetation change and large snags, large woody debris or trees with large mistletoe brooms will not be removed. New trail construction will affect less denning/resting habitat and 1.5 acres more foraging/dispersal habitat than will be recovered by trail decommissioning. This will represent less than 0.1% of these habitats available in the LSR.

Approximately 383 acres of denning/resting habitat and 239 acres of foraging/dispersal habitat are within the 100 meter disturbance buffer of existing historic and unapproved trails that will be authorized as System Trails under this alternative. In fact, decommissioning will reduce the overall amount of disturbance from existing historic and unapproved trails to 318 acres. However, there will

be a 67 acre net gain in disturbance of foraging and dispersal habitat due to new trail construction, which may result in avoidance of this habitat by fishers when recreational use is high. This increase represents approximately 0.1% of foraging/dispersal habitat within the LSR.

Some trails proposed for construction under Alternative 2 that would be located within known fisher home ranges were removed from Alternative 3 and Modified Alternative 3. This and the additional trails to be decommissioned will result in a reduction in the amount of denning/resting habitat disturbed. Overall, when compared to Alternatives 1, 2 and 3, Modified Alternative 3 will result in a considerable reduction in disturbance acres to Pacific fisher habitats.

The additional 67 acres of disturbance in foraging/dispersal habitat from new trail construction may result in localized effects on fishers, although, overall, Modified Alternative 3 will result in a reduction in habitat disturbance compared to Alternatives 1, 2 and 3. Therefore, as with Alternative 3, Modified Alternative 3 “may impact individuals or habitat, but will not likely contribute to a trend towards Federal listing or cause a loss of viability to the local population (Siskiyou Mountains) or species” for Pacific fisher.

OTHER ISSUES CONSIDERED

Other issues not described in detail in this decision but which were considered in my analysis included:

- Potential effects on Forest Service sensitive species, management indicator species, Northwest Forest Plan (NWFP) survey and manage species, migratory birds, and other sensitive terrestrial species.
- Potential effects on soils
- Potential effects on geologic slope stability
- Potential effects on streams and wetlands
- Attainment of Aquatic Conservation Strategy Objectives
- Potential effects on aquatic species and habitats
- Potential effects on public recreational fishery access
- Potential effects on the McDonald Peak Botanical Area
- Potential effects on federally-listed, Forest Service sensitive, NWFP Survey and Manage Species, or locally rare species of vascular plants, bryophytes, lichens, or fungi
- Introduction of non-native invasive plant species
- Potential effects on the McDonald Peak IRA or potential wilderness areas
- Potential effects on cultural resources and/or American Indian access and use
- Increased risk of fire

Detailed discussions about these other issues can be found in the EA, Section 3.4, pages 3-79 to 3-177. The overall effect of my decision to select and implement a Modified Alternative 3 will result in effects that are equal to or less than those described for Alternative 3 in the EA.

RESOURCE PROTECTION MEASURES, MONITORING, AND ENFORCEMENT

In order to minimize potential resource impacts from project activities, project design criteria (PDC) have been incorporated into the selected alternative. Project design criteria are devised in the pre-analysis and analysis phases to reduce environmental impacts and comply with applicable laws and regulations. They include, but are not limited to; best management practices (BMPs), standards and guidelines (S&Gs) and standard operating procedures (SOPs).

Use of the trails will be monitored to determine if they are meeting the objectives of Modified Alternative 3. Monitoring activities will include annual field visits by Forest Service recreation specialists and resource specialists to determine if user conflicts are occurring or if resource impacts are occurring to soils, water resources, vegetation, wildlife, or other sensitive resources, and to determine if new unauthorized trails are being constructed. If necessary, administrative changes may be made to the trail system or designated managed uses on trails to reduce user conflict or to improve the recreational experience.

Under all alternatives, the Forest Service will continue to enforce managed uses within the action area consistent with the Rogue River Land and Resource Management Plan (LRMP), implementing regulations, and other guidance. The following Closure Orders specifically apply to recreation uses within the action area. The enforcement of these closure orders is generally reflected as PDC GEN-12 in Table 4 below.

- Order No. RSF-101 – Use of Vehicles Off National Forest System Roads – Rogue River-Siskiyou National Forest. This order prohibits use of vehicles, including non-motorized vehicles, off Forest Development Roads within the Ashland Watershed, as well as use of motorized vehicles on Forest Development Roads and segments within the Ashland Watershed when the road or segment is posted closed to such vehicles. This order includes an exemption to allow bicycle use on Forest Service trails posted open to bicycle use.
- Order No. RRF-002 – Fire and Occupancy and Use. This order prohibits building, maintaining, attending or using a fire, campfire, or stove fire in the Ashland watershed and general vicinity. It also prohibits camping in the Ashland watershed and general vicinity.

Table 4 illustrates the PDC and mitigation measures that are incorporated into Modified Alternative 3.

Table 4- Project Design Criteria and Mitigation Measures

No.	<i>Project Design Criteria and Mitigation Measures</i>
General	
GEN-1	The exact location of the trail may be refined in the field to accommodate topography, soils, available materials, degree of trail difficulty, and to avoid sensitive areas, such as seeps, springs, and sensitive plant and wildlife species.
GEN-2	All trails will be constructed to minimize erosion, avoid natural water courses, and avoid sensitive riparian areas and plants to the extent possible.
GEN-3	All trails will be designed to minimize sustained steep pitches, grade reversals, and to reduce the chance for water to gain enough speed to recruit and encourage erosion. Rock needed for trail stabilization, sediment traps, and erosion control will be from on-site sources.
GEN-4	Forest clearing in the proposed trail corridors will be reduced to the extent practical through careful trail design and layout.
GEN-5	All trails will be laid out to avoid removal of trees with a diameter-at-breast height (dbh) greater than 6 inches. Coarse woody debris greater than 6 inches dbh will not be moved, but will have the portion on the trail tread cut to the width of the tread and placed to the side of the trail.
GEN-6	Trail tread will be cleared of all organic material down to mineral soil. When practical, all removed vegetation will be used to revegetate off-trail disturbed areas.
GEN-7	Perennial waters will be avoided or spanned by bridges or similar man-made features, where necessary, based on the width of the crossing, use level, type of use, and stream flow. Bridges, if necessary, will be built using a combination of treated and untreated wood or steel and composite materials. Any use of treated wood will be in accordance with Western Wood Preserves Institute <i>Best Management Practices for the Use of Treated Wood in Aquatic and Wetland Environments</i> (WWPI 2011).
GEN-8	Intermittent waters will be crossed by hard fords as necessary.
GEN-9	Revegetation, where applicable, may include topsoil replacement, planting, and seeding, and will occur in accordance with Forest Service botanist prescriptions.
GEN-10	All trails will be signed with uses that are excluded, and all multiuse trails will be signed with trail etiquette guidelines to reduce user conflict.
GEN-11	All trails, with the exception of Split Rock Way, will be designed to Trail Class 2 standards, as provided in as provided in the <i>Trails Management Handbook</i> (FSH 2309.18).
GEN-12	Trail use will be monitored to determine if it is consistent with the managed uses identified for each trail. Closure orders, including user restrictions, may be issued and enforced by Forest Service law enforcement officers if it is determined managed uses are not being adhered to.

<i>No.</i>	<i>Project Design Criteria and Mitigation Measures</i>
Water Quality	
WQ-1	Stream crossing approaches on both new and reconstructed trails will be designed to minimize sedimentation by reducing diversion potential; avoiding deeply incised streams with steep side slopes; using native rock sources to armor approaches on soils with a high erosion rating; and avoiding long approaches that allow water to concentrate, erode trail tread and deliver fine sediment.
WQ-2	All trail stream crossings will meet the following to the extent practicable: (1) contain little to no fine fill material; (2) provide for unrestricted stream flows; and (2) avoid stream capture. Stream crossings that must use conveyance structures, such as culverts, will be inspected yearly and maintained when needed.
WQ-3	Legacy sediment sources, such as gullies, head cuts, and fill material in stream crossings, that are associated with existing historic or unapproved trails in the action area will have stabilization techniques applied during trail reconstruction or decommissioning. If trails are re-routed to avoid these areas, stabilization techniques will be applied during the decommissioning process. Example of stabilization techniques include water bars, check dams, waddles, fill and culvert removal, and planting and seeding.
WQ-4	Existing historic and unapproved trail segments proposed for decommissioning will be recontoured where needed to eliminate erosion. All fill will be removed from channels and stream banks will be recontoured to mimic the upstream and downstream banks to the extent possible. Adjacent duff or litter will be moved to cover trail tread and the trail will be obscured by placing branches and small diameter course wood.
WQ-5	During trail maintenance, reconstruction, and decommissioning, all displaced soil or fill materials will be placed in locations where they are unlikely to be discharged to streams, to the extent practicable.
WQ-6	Signs will be installed at the White Rabbit and Four Corners trailheads providing guidance to trail users on the proper disposal of pet and human waste. The signs will indicate that all waste must either be removed using a disposal waste bag, or buried. In all cases, buried waste must be located at least 200 feet from any waterbody and buried at least 6 inches deep.
WQ-7	All gas powered equipment used for trail construction, re-construction, and maintenance will be refueled at least 150 feet from all watercourses (intermittent and perennial).
WQ-8	Trail conditions will be monitored in the wet months for excessive rutting, erosion, or sediment delivery to streams. As necessary, additional erosion control devices may be employed locally to address these conditions, and/or the trail may be closed seasonally to mitigate short-term impacts.
Soils and Slope Stability	
GEO-1	<p>Additional consultation by a geologist or soil scientist will be completed during trail design and layout when any of the following landscape characteristics are found in the vicinity of a proposed alignment. Field review will be used to inform adjustments to segment locations to avoid potentially high risk slope failure areas.</p> <ul style="list-style-type: none"> ▪ <u>Slope aspect</u>. Northerly and easterly aspects that tend to hold more water on site longer and have developed deeper soil / decomposed granitics layers.

<i>No.</i>	<i>Project Design Criteria and Mitigation Measures</i>
	<ul style="list-style-type: none"> ▪ <u>Slope shape</u>. Concave slopes that concentrate surface and ground water, and/or are characterized by deeper soil / decomposed granitics layers. ▪ <u>Position of trail on the slope</u>. Trail locations at or near obvious changes in slope gradient (which are typically inherently less stable). Trails on lower slope positions where there is potential for higher ground water flows. ▪ <u>Slope gradient</u>. Trails being proposed on slopes of 75% or greater, or trails on slopes between approximately 50% and 75%. ▪ <u>Slope complexity</u>. Simple slope complexity (smooth linear or curvilinear slopes) that have no complex topography to slow and catch soil movement, such that a failure would flow directly to stream channels. ▪ <u>Stream/draw crossings</u>. Multiple crossings of individual drainages. ▪ <u>Trail concentration</u>. Multiple trail segments on an individual slope.
Aquatic Resources	
AQ-1	A fisheries specialist will be consulted prior to constructing any stream crossings on fish-bearing streams.
Botanical Resources and Invasive Plants	
BOT-2	The Split Rock Trail in the McDonald Peak vicinity will be located to avoid the known population of Howell's tauschia.
BOT-5	The Forest Service will periodically monitor the first ½ mile of the Upper Time Warp trail from its start point on the crest to make sure recreational users trying to avoid lingering snowfields on the trail do not create braided routes and/or unduly disturb populations of Henderson's horkelia or Mt. Ashland lupine (<i>Lupinus aridus</i> ssp. <i>ashlandensis</i>). Preventive measures, such as an early season closure or awareness signs, will be considered if warranted.
BOT-7	Two clustered ladyslipper orchid occurrences will be flagged for avoidance prior to decommissioning activities along the Reservoir Trail to ensure they are not trampled or otherwise damaged by construction activities.
BOT-8	The patch of three-toothed horkelia (<i>Horkelia tridentate</i>) on the section of the Winburn Trap Trail proposed for decommissioning will be marked for avoidance prior to decommissioning activities to ensure it is not trampled or otherwise damaged by construction activities.
BOT-9	The three-toothed horkelia population occupying the old spur road in the SE ¼ of the NE ¼ of section 28 will be protected to extent practical by narrowing and confining the trend width, so that trail edge plants can survive when the old roadbed, currently unused, becomes part of Lower Marty's Trail.
BOT-10	All proposed new trails not specifically mentioned above and authorized for construction will be surveyed for Forest Service Sensitive and NWFP Survey and Manage vascular plants and bryophytes once routes are flagged but before trail construction begins. If Forest Service Sensitive or Survey and Manage species, or other species of local concern, are found, trails will be re-flagged/re-routed to the extent necessary to avoid impacting the viability of local populations.

<i>No.</i>	<i>Project Design Criteria and Mitigation Measures</i>
BOT-11	New trails will be re-routed, where practical, prior to construction if invasive plants are found to be in the path of proposed new trails and there is concern that trail construction and trail use will lead to spread or expansion of the invasive plant population.
BOT-12	If new trails must be constructed through known invasive plant sites, or if ground-disturbing trail decommissioning or restoration activities must occur in infested areas, workers will be required to clean tools, clothing, and equipment, before moving beyond the infested area.
BOT-13	Before beginning construction of any new trails, workers will be required to check tools, clothing, and equipment for soil or seeds of invasive plants, and clean these items off-Forest or at roadside if contaminated.
Cultural Resources	
CUL-1	A qualified cultural resource specialist will review any changes in the design and location of trail reroutes that may become necessary during implementation due to unforeseen circumstances prior to construction.
CUL-2	A qualified cultural resources specialist will monitor construction of all trail segments where significant cultural resources are known to the vicinity.
CUL-3	If cultural materials are discovered during ground-disturbing activities, all work in that area will stop and the Forest Archaeologist will be contacted to determine the appropriate course of action. The proposed work may not resume in that area until the Forest Archaeologist determines that the activity will not cause an adverse effect to significant cultural resources.

OTHER ALTERNATIVES CONSIDERED

In addition to Alternative 3 – Preferred Alternative, two alternatives (Alternative 1 – No Action and Alternative 2 – Proposed Action) were considered in the environmental assessment. Two additional alternatives were considered but eliminated from detailed study because they did not meet the purpose and need and were not feasible to implement (EA, CH. 2.6 pgs. 2-34 to 2-36). The alternatives described below were analyzed in detail.

Alternative 1- No Action (EA, Ch. 2.3.1 pg. 2-10 to 2-11)

Alternative 1 (No Action) provides a baseline from which to analyze the effects of the action alternatives. Under Alternative 1, the Forest Service would continue to manage System Trails in the action area in accordance with current management plans and FSH 2309.18. No new trails would be constructed, and existing historic and unapproved trails would not be incorporated as System Trails. The Forest Service would also continue to discourage use and proliferation of unapproved trails through monitoring and enforcement of managed uses within the action area. However, because it is uncertain how many of existing historic or existing unapproved trails could effectively be removed in the short term, and in consideration of the numerous unsuccessful attempts by the Forest Service to close these trails, the EA conservatively assumed that no trails would be removed or decommissioned under Alternative 1, and that impacts associated with their continued use would continue.

In total, 15.8 miles of System Trails and 25.6 miles of existing historic and unapproved trails would remain in the action area under Alternative 1.

Due to resource impacts associated with soils, water quality, and wildlife, this alternative does not meet the purpose of the proposed action to provide an adequate and sustainable trail system that minimizes impacts to soil, water, cultural, vegetation, and wildlife resources and discourages unauthorized trail proliferation.

Alternative 2- Proposed Action (EA, Ch. 2.32 pg. 2-11 to 2-12)

Alternative 2 reflects the trail design proposed by the Forest Service during public scoping. This alternative was designed to meet the purpose and need of the proposed action, and reflects many of the aspects of the Trails Master Plan submitted by AWTA in 2011.

Approximately 31.4¹ miles of trails would be incorporated into the approved trail network in the action area under this alternative, including about 22.0 miles of existing historic and unapproved trails and 9.4 miles of new proposed trails. A total of 5.2 miles of existing historic and unapproved trails would be decommissioned under this alternative.

I have decided not to select Alternative 2 due to impacts to LSRs (net increase of 73 acres of disturbance), northern spotted owls and their habitat (associated with the Windburn Trap and Upper Time Warp trails), impacts to Pacific fisher and their habitat (associated with the Rip 1, Freak Went

¹ Mileage total reflects an additional .5 mile of the proposed Jabberwocky reroute which was inadvertently not included in the Alternative 2 total mileage in the EA.

Flyer, Not Stirred and Shaken trails), and potential water quality concerns (associated with the Windburn Trap trail).

PUBLIC INVOLVEMENT

In June 2012, the Forest Service published a legal notice notifying the public of the opportunity to comment on the Ashland Trails Project. The public scoping period opened on June 13, 2012 and closed on July 27, 2012. Letters were sent out to agencies and interested groups and citizens explaining the background, purpose and need, and preliminary details and design features of the proposed action, and requesting comments, concerns or issues specific to the Ashland Trails Project be provided to the Forest Service.

Thirty-two comment letters were received during the scoping period. A copy of the Scoping Report, which summarizes the comments received during the scoping period, is provided as Appendix A of the EA.

Copies of the December 2014 Ashland Trails Project Environmental Assessment (EA) and Appendices, along with an invitation to comment, were mailed to those individuals and organizations involved with the proposed action or who had requested a copy of the EA. Legal Notices were published in the Medford Mail Tribune on December 29, 2014 and January 7, 2015. The notices established a comment period under 36 Code of Federal Regulations (CFR) 215. The comment period began on December 29, 2014 and ended February 6, 2015, a period of 38 days. During the comment period, the Forest Service received 119 comment letters. Comments were provided on various topics, some expressed concern while others provided support or recommendations. Responses to substantive comments are included as an attachment to this Draft DN and FONSI. All comments submitted during the planning process have been considered.

On January 8, 2015 an open house style meeting was held at the Ashland Public Library with Forest Service resource specialists on hand to answer questions about the project from the public. Over 160 individuals attended the meeting.

FINDING OF NO SIGNIFICANT IMPACT

I have reviewed the EA and associated documents and believe there is adequate information within the project record to provide a reasoned choice of action. Implementing the selected alternative with the specified management requirements, constraints, and mitigation measures will cause no unacceptable cumulative impacts to any resource.

After considering the environmental effects described in the EA (EA pg. 3-1 to 3-177), I have determined that these actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27); therefore, an environmental impact statement is not needed. I base my finding on the following:

1. Impacts that may be both beneficial and adverse are discussed in the EA (EA Ch. 3 pg. 3-1 to 3-177). These impacts are within the range of the Forest Plan and will not have significant impacts on resources identified and described in Chapter 3 of the EA. The selected

alternative (Modified Alternative 3) provides the best combination of physical, biological, social and economic benefits.

2. There will be no significant effects on public health and safety. There may be a need to temporarily close a section of an existing trail during new trail construction, but it is not anticipated to impact public safety.
3. There will be no significant impacts to unique characteristics of geographic areas such as cultural resources, park lands, prime farmlands, wetlands, old growth forest, range land, research natural areas, experimental forests, inventoried roadless areas or other ecologically critical areas (EA pg. 1-13, 3-164 to 3-168, 3-177 to 3-183).
4. Base on public participation and analysis in the EA, the effects on the quality of the human environment are not likely to be highly controversial (EA Ch. 3 pg. 3-1 to 3-15). There is no known credible scientific controversy over the impacts of the project. Although there are sometimes competing interests surrounding recreation, the conclusions of effects were not shown to have any scientific controversy.
5. There are no known effects on the human environment that are highly uncertain or involve unique or unknown risks associated with this project. Trail construction is common practice and the effects are well known. The EA effectively addresses and analyzes the environmental impacts associated with the project and incorporates well-established best management practices to minimize negative impacts (EA Ch. 2 pg. 2-30 to 2-33).
6. These actions pose no disproportionately high or adverse human health or environmental effects, including social and economic effects, on minority or low-income populations (FONSI Element 2). This project has shared the Federal government's overall trust responsibility to Indian tribes where treaty or other legally defined rights pally to National Forest System lands. Consultation with the Confederate Tribes of the Siletz Indians of Oregon, the Confederated Tribes of the Grande Ronde Community of Oregon and the Quartz Valley Indian Reservation has occurred. Consultation has incorporated opportunities for tribal comments and contributions to the proposed project (EA Ch. 3 pg. 3-173).
7. This action is not likely to establish a precedent for future actions that may be implemented to meet the goals and objectives of the Rogue River National Forest Land and Resource Management Plan and the Klamath National Forest Land and Resource Management Plan. This project is consistent with management direction set forth by the Forest Plans (EA Ch. 1 pg. 1-11 to 1-13).
8. There are no known significant adverse, cumulative, or secondary effects between this project and other projects (completed, active, or planned). Effects to the basic resource values of soil, water, fish, plants, and wildlife are estimated and determined to be localized, limited, or small in scale (EA Ch. 3 pg. 3-15 to 3-164). This determination is based on the results of cumulative effects analysis discussed in the EA.
9. Based on the cultural resource inventory and report, there will be no effect on historic properties under the terms of the Programmatic Agreement between the Advisory Council on Historic Preservation (ACHP), the Oregon State Historic Preservation Officer (SHPO) and Region 6 of the Forest Service. All significant and unevaluated archaeological sites will be avoided under Alternative 3. PDC CUL-1 through CUL-3 will be implemented to reduce the

potential for impacts to both known resources and any new resources that may be discovered during construction.

10. The biological evaluation for plant species proposed, endangered, threatened or sensitive determines that through the implementation of PDC BOT- 5 through BOT-13, impacts to these species will be minimized and will not be likely to adversely affect the viability of the local or regional populations or the species as a whole (EA Ch. 3 pg. 3-149 to 3- 164, Biological Evaluation located in the project record).

A biological evaluation for wildlife species proposed, endangered, threatened or sensitive has been prepared and located in the project record. Analysis of wildlife species indicates that this project “may affect and is not likely to adversely affect” northern spotted owls or their critical habitat. For or Pacific Fisher, the project “may impact individuals or habitat, but will not likely contribute to a trend towards Federal listing or cause a loss of viability to the local population (Siskiyou Mountains) or species” (EA Ch. 3 pg. 3-52 to 3-78, Biological Evaluation located in the project record).

The proposed action is consistent with the LRMP, as amended by the 2001 Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines in Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl (USDA and USDI 2001b), using the 2001 Survey and Manage species list and survey requirements described in the most recent survey protocols for each species (and reflecting modifications resulting from a 2011 Settlement Agreement) . Surveys were not triggered for any Survey and Manage vertebrate or non-vertebrate animal species by the proposed action, as documented in the Wildlife Biological Evaluation and Specialist Report for the proposed action. Management recommendations for the known sites of Chace sideband within the action area will be implemented to maintain suitable habitat (EA Ch. 3 pg. 3-79 to 3-112).

11. The actions described for this project in the EA do not threaten a violation of Federal, State, or local law or requirements imposed for the protection of the environment. Applicable laws and regulations were considered in the EA (EA Ch. 1 pg. 1-4, 1-11 to 1-16) and this project is consistent with the Rogue River and Klamath National Forest Land and Resource Management Plans as amended.

There are no commitments of resources that cannot be regained such as the extinction of a species or the removal of mined ore. There are no irreversible commitments of resources. Irretrievable commitments are those that are lost for a period of time such as the temporary loss of timber productivity in forested areas that are kept clear for use as a power line right-of-way or road. The development and use of the trails and trailhead are considered irretrievable commitment of land to a non-vegetative state until such time that the path is abandoned and the disturbed sites are returned back to productive capacity.

This decision is made with consideration of past, present and reasonably foreseeable future actions on National Forest lands and other ownerships within potentially affected areas which could have a cumulatively significant effect on the quality of the human and natural environment.

LEGAL REQUIREMENTS AND POLICY

In reviewing the EA and actions associated with the modified version of Alternative 3, I have concluded that my decision is consistent with the following laws and requirements.

The National Environmental Policy Act (NEPA)

NEPA establishes the format and content requirements of environmental analysis and documentation as well as requirements for public involvement and disclosure. The entire process of preparing this EA was undertaken to comply with NEPA (EA Ch. 1 pg. 1-1).

The National Forest Management Act (NFMA)

I find this decision to be consistent with the long term management objectives as discussed in the Rogue River and Klamath National Forest Land and Resource Management Plans as amended. All other Forest Plan direction, including from the Northwest Forest Plan and the Recreational Opportunity Spectrum has been adhered to and incorporated into the project's design (EA Ch. 1 Pg. 1-4, 1-11 to 1-116).

The Preservation of American Antiquities Act of June 1906 and the National Historic Preservation Act: The Oregon State Historic State Historic Preservation Officer (SHPO)

As noted in FONSI Element 9, a cultural resources inventory has been completed for the project area. Under the terms of the Programmatic Agreement between the Advisory Council on Historic Preservation (ACHP), the Oregon State Historic Preservation Officer (SHPO) and Region 6 of the Forest Service a determination was made of no effect on historic properties (EA Ch. 3 pg. 3-168 to 3-176).

The Endangered Species Act of 1973, as amended

Biological Evaluations were prepared to document the possible effects of the proposed activities to threatened and endangered species within the project area. The selected alternative will not be likely to adversely affect the viability on proposed, endangered, threatened or sensitive plant species (EA Ch. 3 pg. 3-149 to 3-164, Biological Evaluation and NWFP Survey and Manage Report located in the project record). The project "may affect and is not likely to adversely affect" northern spotted owls or their critical habitat. For Pacific Fisher, the project "may impact individuals or habitat, but will not likely contribute to a trend towards Federal listing or cause a loss of viability to the local population (Siskiyou Mountains) or species" (EA Ch. 3 pg. 3-52 to 3-78, Biological Evaluation and Specialist Report located in the project record). There will be no effect on listed fish species, fish habitat or Region 6 Sensitive species (EA Ch. 3 pg. 3-142 to 3-147).

A Letter of Concurrence (Reference # 01EOFW00-2014-F-0032) from the U.S. Fish and Wildlife Service was received by the Forest on February 18th, 2014 which "reflects the Service's finding that implementation of Alternative 3 of the Ashland Trails Project, as proposed by the Forest, is not likely to adversely affect the spotted owl or its critical habitat".

The Clean Water Act, 1982 and 303(d)

The selected alternative will comply with the Clean Water Act. In compliance with the Clean Water Act, the Oregon Department of Environmental Quality lists several streams within in the project area as water quality impaired streams (303)(d) list). Table 3-5 in Ch. 3 pg. 3-19 to 3-20 lists the waterbodies within or downstream of the analysis area and what pollutant the stream is listed for. Management direction regarding 303(d) listed streams is that any project activity should not further degrade the parameters for which it is listed (Forest Service and Bureau of Land Management Protocol for addressing Clean Water Act Section 303(d) Waters).

I find that the selected alternative will not compromise the quality of water sources (EA Ch. 3 pg. 3-16 to 3-39).

The Clean Air Act

The selected alternative will comply with the Clean Air Act. The Act prescribes air quality to be regulated by each individual state. There are no smoke generating activities associated with the project (EA Ch. 3 pg. 3-178).

Civil Rights and Environmental Justice

Executive Order 12898 on environmental justice requires federal agencies to identify and address any disproportionately high and adverse human health or environmental effects on minority and low income populations. The analysis focuses on potential effects from the project to minority populations, disable persons, and low-income groups.

After evaluating the discussion in the EA Ch.3, pages 3-179 to 3-183, I have determined that there will no discernable impacts from any of the alternatives on Native Americans, women, other minorities, or the Civil Rights of any American citizen.

PRE-DECISIONAL ADMINISTRATIVE REVIEW PROCESS

The Ashland Trails Project record is on file at the Siskiyou Mountains Ranger District, Star Ranger Station at 6941 Upper Applegate Road, Jacksonville, Oregon, 97530. This project is subject to pre-decisional administrative review pursuant to 36 CFR 218, Subpart B. Also called the “objection process” the pre-decisional review process replaced the appeal process (36 CFR 215) in March 2013. The primary difference with the objection process is that a person may object to a project prior to the final decision, whereas under the appeal process, appeals were made after the decision. The full text of the rule can be found here: <http://federal.eregulations.us/cfr/title36.part218>.

Only individuals or organizations that submitted specific written or oral comments (36 CFR 218.2) during a designated opportunity for public participation (scoping or the public comment period) may object (36 CFR 218.5). Notice of objection must meet the requirements of 36 CFR 218.2. Objections can be submitted in writing, either electronically or in hard copy, but must be filed with the Reviewing Officer within 45 days following the publication date of the legal notice of the opportunity to object in the Mail Tribune, Medford, Oregon. The publication date of the legal notice is the exclusive means for calculating the time to file an objection. Those wishing to file an objection

to this draft decision should not rely upon dates or timeframe information provided by any other source. Objections sent by mail must be received before the close of the fifth business day after the objection filing period.

Incorporation of documents by reference is not allowed, except for the following list of items that may be referenced by including date, page, and section of the cited document, along with a description of its content and applicability to the objection: 1) all or any part of a federal law or regulation; 2) Forest Service directives and land management plans; 3) documents referenced by the Forest Service in the subject EA; or 4) comments previously provided to the Forest Service by the objector during public involvement opportunities for the proposed project where written comments were requested by the Responsible Official. All other documents must be included with the objection (36 CFR 218.8(b)).

Issues raised in objections must be based on previously submitted specific written comments regarding the proposed project or activity and attributed to the objector, unless the issue is based on new information that arose after the opportunities to comment. The burden is on the objector to demonstrate compliance with the requirement for objection issues 36 CFR 218.8(c).

Minimum requirements of an objection are described at 218.8(d). An objection must include a description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project; if applicable, how the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider; and a statement that demonstrates the connection between prior specific written comments on the particular proposed project or activity and the content of the objection, unless the objection concerns an issues that arose after the designated opportunities for comment.

Objections may be:

Postal Delivery: Reviewing Officer, Rogue River- Siskiyou National Forest, Attn: Rob MacWhorter, 3040 Biddle Road, Medford, Oregon, 97504.

Emailed to: objections-pnw-rogueriver-siskiyou@fs.fed.us. Please put OBJECTION and the project name in the subject line. Electronic objections must be submitted as part of an actual e-mail message, or as an attachment in Microsoft Word (.doc), rich text format (.rtf), or portable document format (.pdf) only. E-mails submitted to addresses other than the ones listed above or in formats other than those listed above or containing viruses will be rejected. It is the responsibility of the objector to confirm receipt of objections submitted by electronic mail. For electronically mailed objections, the sender should normally receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive an automated acknowledgement of receipt, it is the sender's responsibility to ensure timely receipt by other means;

Hand deliveries: Rogue River- Siskiyou National Forest Supervisor's Office, 3040 Biddle Road, Medford, Oregon, 97504. Hand deliveries can occur between 8:00 AM and 4:30 PM, Monday through Friday except legal holidays; or

Faxed to: Rogue River- Siskiyou National Forest Supervisor, Attn: Rob MacWhorter at (541) 618-2400.

IMPLEMENTATION

Implementation of this project is expected to begin in the fall of 2015. If no objection is filed, implementation may begin on, but not before, the fifth business day following the close of the 45-day objection period. If an objection is filed, implementation may occur immediately following the date of the final decision.

CONTACT AND GENERAL INFORMATION

The Ashland Trails Project record is on file at the Siskiyou Mountains Ranger District office at 6941 Upper Applegate Road, Jacksonville, Oregon 97530. The EA and decision are also available on the Rogue River- Siskiyou National Forest webpage at: <http://www.fs.usda.gov/project/?project=39748>

For additional information concerning the specific activities authorized with this draft decision you may contact:

Brian Long, Project Leader, Recreation
Siskiyou Mountains Ranger District
6941 Upper Applegate Road
Jacksonville, OR 97530
(541) 899-3815

RESPONSIBLE OFFICIAL

The District Ranger of the Siskiyou Mountains Ranger District on the Rogue River- Siskiyou National Forest is the responsible official responsible for deciding the type and extent of management activities in the Ashland Trails Project area.

Signature reserved for final decision

DONNA M. MICKLEY
District Ranger
Siskiyou Mountains Ranger District
Rogue River- Siskiyou National Forest

Date

**ASHLAND TRAILS PROJECT
DRAFT DECISION NOTICE AND FINDING OF NO SIGNIFICANT
IMPACT**

ATTACHMENT A

Response to Comments

36 CFR 215

NOTICE AND COMMENT (SECTIONS 215.3, 215.5, AND 215.6)

Copies of the December 2014 Ashland Trails Project Environmental Assessment (EA) and Appendices, along with an invitation to comment, were mailed to those individuals and organizations involved with the proposed action or who had requested a copy of the EA. Legal Notices were published in the Medford Mail Tribune on December 29, 2014 and January 7, 2015. The notices established a comment period under 36 Code of Federal Regulations (CFR) 215. The comment period began on December 29, 2014 and ended February 6, 2015, a period of 38 days.

A total of 119 comment letters and emails were received during the comment period. The comment letters were read and coded based on content and intent by a U.S. Forest Service (Forest Service) planning team, with District Ranger/Responsible Official oversight, review and concurrence. The original comment letters and emails reflecting the Forest Service review and coding are made a part of the Project Record (incorporated by reference) and are available upon request. Table 1 summarizes the name and organization of persons who commented on the EA and provides the reference number assigned to the comment letter.

Table 1. Summary List Persons and Organizations who Commented on the ATP EA

Ref #	Name	Organization
ATP-1	Barbara and Brian Comnes	Private citizens
ATP-2	Barbara and Brian Comnes	Private citizens
ATP-3	Andrea Napoli	Private citizen
ATP-4	Curt Evans	Private citizen
ATP-5	Milo Shubat	Private citizen
ATP-6	Scot Krupa	Ashland Cycle Sport
ATP-7	Chris Herbst	Private citizen
ATP-8	RVMBA Board	Rogue Valley Mountain Bike Association
ATP-9	Drew Mebane	Private citizen
ATP-10	Andrea Napoli	Private citizen
ATP-11	Justin Adams	Private citizen
ATP-12	Diana Aldridge	Private citizen
ATP-13	Annette Parsons and Jim Clover	Private citizens
ATP-14	Jeff LaLande	Private citizen
ATP-15	Brian Kolodzinski	Private citizen
ATP-16	Leslye Wing	Private citizen

Ref #	Name	Organization
ATP-17	Valeria Lantz	Private citizen
ATP-18	Hope Robertson	Private citizen
ATP-19	Shiela Timmons	Private citizen
ATP-20	Vern Crawford	Private citizen
ATP-21	Alice Levey	Private citizen
ATP-22	Allan Goffe	Private citizen
ATP-23	Kevin Talbert	Private citizen
ATP-24	Trish Broersma	Private citizen
ATP-25	Jamie Hutchinson	Private citizen
ATP-26	Chrissy Maloney	Private citizen
ATP-27	Kellie Hill	The Right Plan Nutrition Counseling
ATP-28	Nathan Riddle	Private citizen
ATP-29	Paula Weldon	Private citizen
ATP-30	Jim Bowers	Private citizen
ATP-31	Amy Patton	Private citizen
ATP-32	Patrick Honsinger	Private citizen
ATP-33	Suzanne O'Daly	Private citizen
ATP-34	Birte Ferguson	Private citizen
ATP-35	Russell Lancaster	Private citizen
ATP-36	Tia Bodington	Private citizen
ATP-37	Shira Cluff	Private citizen
ATP-38	Carol Hearn	Private citizen
ATP-39	Terry Canavello	Private citizen
ATP-40	Amy Nangle	Private citizen
ATP-41	Mike Conner	Private citizen
ATP-42	Skyler Conner-Coash	Private citizen
ATP-43	Maciej Simm	Private citizen
ATP-44	Mike Stadnisky	FlowJo, LLC / Private citizen
ATP-45	Elaine Bothe	Private citizen
ATP-46	Duncan Coppedge	Private citizen
ATP-47	Brian Roberts	Private citizen
ATP-48	Casey Frieder	Private citizen
ATP-49	Marina Borowy	Private citizen
ATP-50	Robert Hodge	Siskiyou Corp / Private citizen
ATP-51	Victor Chang	Private citizen
ATP-52	Barbara Kozol	Private citizen
ATP-53	Suzanne Quilter	Private citizen
ATP-54	Duane Pierce	Hild Collision Center / Private citizen
ATP-55	Jennifer Butler	Private citizen
ATP-56	John Price	Private citizen
ATP-57	Jeanine Moy	Klamath-Siskiyou Wildlands Center (KS Wild)

Ref #	Name	Organization
ATP-58	Jana' Hjelmervik	Private citizen
ATP-59	Jeff Leever	Private citizen
ATP-60	Selene Raffel	Private citizen
ATP-61	Mark Phelps	Private citizen
ATP-62	Kathy Caulfield	Private citizen
ATP-63	Dave Caulfield	Private citizen
ATP-64	Elisabeth Geismar	Private citizen
ATP-65	Annette Brophy	Private citizen
ATP-66	Joe Brophy	Private citizen
ATP-67	Nathan Granados	Southern Oregon Outdoor Program
ATP-68	Penney Reed	Private citizen
ATP-69	Tiffany Hokanson	Private citizen
ATP-70	Diana Aldridge	Private citizen
ATP-71	Joni Davis Hankin	Private citizen
ATP-72	Trish Broersma	Private citizen
ATP-73	Karen Piper	Private citizen
ATP-74	Della Merrill	Private citizen
ATP-75	Kellie Kinkead	Private citizen
ATP-76	Jennifer Jensen	Private citizen
ATP-77	James Bowers	Private citizen
ATP-78	Debbie Hansen-Bernard	Private citizen
ATP-79	Jason Becker	Private citizen
ATP-80	Eric Iversen	Private citizen
ATP-81	Joy Trevey-Lowell	Private citizen
ATP-82	Doug Heiken	Oregon Wild
ATP-83	Diane Newell Meyer	Private citizen
ATP-84	Adam Elson	Private citizen
ATP-85	Christy Frenzen	Private citizen
ATP-86	Christine Cook	Private citizen
ATP-87	Joseph Vaile	KS Wild
ATP-88	Tom Lowell	Private citizen
ATP-89	Joseph Vaile	KS Wild
ATP-90	John Ford	Bear Creek Bicycle
ATP-91	Jeanine Moy	KS Wild - Adopt a Botanical Area Program
ATP-92	Nancy Firth	Private citizen
ATP-93	Elisabeth Geismar	Private citizen
ATP-94	Rich Vanderwyst	Private citizen
ATP-95	Bob Plummer	Private citizen
ATP-96	John Firth	Private citizen
ATP-97	Chris Chambers	City of Ashland
ATP-98	Tom Pike	Private citizen

Ref #	Name	Organization
ATP-99	Michael Bronze	Rogue Valley Mountain Bike Association
ATP-100	Joe and Sharon Mosley	Private citizens
ATP-101	Jake Sawyer	Private citizen
ATP-102	Marilyn Bailey	Private citizen
ATP-103	Mary Kwart	Private citizen
ATP-104	Dragonfly Richards	Private citizen
ATP-105	Dave Richards	Private citizen
ATP-106	Paul Rowland	Private citizen
ATP-107	Zane Houshour	Private citizen
ATP-108	AWTA Board	Ashland Woodlands and Trails Association
ATP-109	Matt Robertson	Private citizen
ATP-110	Don Morehouse	Private citizen
ATP-111	Blaine Pickett	Private citizen
ATP-112	Robert Levorse	Private citizen
ATP-113	Sean Fairbairn	Private citizen
ATP-114	Kristi Mergenthaler	Siskiyou Chapter, Native Plant Society of Oregon
ATP-115	Kate Cleland-Sipfle	Private citizen
ATP-116	Luke Ruediger	Private citizen
ATP-117	Colleen Horner	Private citizen
ATP-118	Ted Clay	Private citizen
ATP-119	Doobie Lawson	Private citizen

FOREST SERVICE RESPONSE TO COMMENTS

Comments were reviewed and sorted into two types – substantive and non-substantive. A **substantive** comment is defined as: “A review comment made by a commenter that offers a concern with factual basis that may have bearing on the decision being made.” A working definition of substantive that was used for categorizing **substantive comments** include those that:

- Provide new information pertaining to the Proposed Action or an alternative
- Identify a new relevant issue or expand upon an existing issue
- Identify a different way (alternative) to meet the underlying need
- Identify a specific flaw in the analysis
- Ask a specific relevant question that can be meaningfully answered or referenced
- Identify an additional source of credible research, which if utilized, could result in different effects

Substantive comments were numerically coded in the Forest Service review (e.g., 101, 201) and recorded on the original comment letter or email.

Non-substantive comments (and associated letter codes) are defined as those that:

- A - Primarily focus on personal values or opinion or simply provide or identify a preference (vote) for an alternative considered

- B** - Restate existing management direction, laws or policies that were utilized in the design and analysis of the project (or provide personal interpretation of such), or restate analysis or information documented in the EA
- C** - Provide comment that is considered outside the scope of the analysis (not in compliance with current laws and policies, is not relevant to the specific project proposal, or is outside of the Responsible Official's decision space)
- D** - Lack sufficient specificity to support a change in the analysis or permit a meaningful response, or are composed of general or vague statements not supported by data or research
- E** - Opinion, political commentary, setup (often positive or supportive)

Non-substantive comments were sorted using the above letter codes and recorded on the original comment letter or email.

Each substantive comment received on the EA is summarized in **bold** below. A response from the Forest Service is also provided for each substantive comment. To minimize duplication, substantive comments addressing essentially the same topic or concern have been consolidated among the various letters. The parenthetical reference following each substantive comment (e.g., ATP-81, 82) indicates the reference number of the letter(s) where the substantive comment was raised.

Comments and responses will be used to help the Responsible Officials reach an informed decision regarding the Ashland Trails Project.

Substantive Comments - Corrections/Clarifications

Comment 101: Consideration of the Split Rock Trail as an existing historic trail

Why is the Split Rock Trail identified as an existing historic trail in the EA? In some areas it is barely perceptible and early maps of the area do not indicate a trail was historically located along the proposed alignment. [ATP-1, 14, 114]

Response: Section 2.3 (page 2-9) of the EA defines “existing historic trails” as “trails that were at one time System Trails and that were identified on Forest Service maps but for unknown reasons were dropped from the System. Some of these trails are thought to have been constructed prior to 1910 and accessed fire lookouts and the Siskiyou Crest.” Section 3.4.12 in the EA (page 3-172) notes that existing maps of the area (ca 1896 and 1925) indicate that the southern half of the Split Rock Trail appears to have been in existence in 1896 as a pack trail, and later as a firefighting trail. Public comments received on the EA (ATP-14) also describe that later maps of the area (ca 1930-1950) show a trail connected the upper McDonald Creek Basin with Wagner Glade Gap (including the Wagner Glade Lookout) along the Siskiyou Crest Ridgeline. Although the present trail is ephemeral and barely perceptible in some locations, a trail alignment in the general vicinity of the Split Rock Trail was part of the Forest Service system at one point. As such, the Split Rock Trail is considered an existing historic trail for the purposes of the EA analysis.

Comment 102: Emphasis on Bicycle Uses on Trails

All alternatives provide substantially more mileage to bicycle uses than other uses. Why is the Forest Service emphasizing bicycle uses, particularly given the rugged and steep terrain and sensitivity of some areas (e.g., botanical resources in the McDonald Peak Botanical Area)? [ATP-1]

Response: Proposed managed uses were based on a variety of factors including trail location, use levels, predominant uses, and anticipated changes in use over time. As described in Section 3.2.1 (page 3-7), running, hiking, and mountain bike use within the action area has grown dramatically over the last decade, particularly on trails in the vicinity of Ashland. The primary user conflict in the area is between downhill mountain bikers and pedestrians (hikers, runners, and dog walkers) and to a lesser extent, equestrians (in part, because equestrians indicate they don't use the trail system frequently due to safety concerns). The EA alternatives considered trail configurations that would separate uses in the eastside of the action area, where use is highest, and disperse use to the westside of the action area to lessen trail density and contact with other uses (see Section 3.2.2, page 3-13).

While it is anticipated that all uses in the action area will increase over time, bike use will likely increase substantially, and will continue to transition from cross-country to downhill mountain bike riding. Both Alternatives 2 and 3 in the EA recognize the potential for this increased use – including the potential for user conflict – by providing adequate trail mileage for all uses, and opportunities for dispersed and separate uses where appropriate. As summarized in Table 3-3 in the EA (page 3-14), between 36.7 miles (Alternative 3) and 43.2 miles (Alternative 2)¹ would be available to bikes under the alternatives. Comparatively, between 36.7 miles (Alternative 3) and 41.3 miles (Alternative 2) would be available to pedestrians, and between 27.2 miles (Alternative 3) and 30.9 miles (Alternative 2) would be available to equestrians.

Comment 103: Implementation Process

Who will build and maintain the trails? What role will volunteers play in constructing trails? How will volunteers be organized and who will be allowed to host trail work days? Will the Forest Service apply for grant money? How will the Forest Service coordinate with the City of Ashland in areas where the trails connect with or extend into the City trail system? [ATP-7, 97]

Response: As described in Section 2.2.4 (page 2-4) in the EA, trails would be constructed by trained volunteers, user groups, and youth organizations under the direction of Forest Service staff. Trail maintenance would be completed by trained volunteers and recreation special use permit holders. All trails would be constructed in accordance with the *Trails Management Handbook*, Forest Service Handbook (FSH) 2309.18; the design parameters provided in Section 2.2.3 of the EA (page 2-3); and the Project Design Criteria (PDC) summarized in Table 2-9 of the EA (pages 2-30 to 2-33).

It is anticipated that user groups, such as the Ashland Woodlands and Trails Association (AWTA), would continue to play an important role in helping to organize trail construction and maintenance groups. Where possible, the Forest Service would apply for grant money to construct and maintain trails.

Forest Service staff would work closely with the City of Ashland Forest Lands Commission to ensure that trails that cross onto City property are compatible with City trail easements, design, and managed uses, and would not encroach onto private property where no easement exists.

Comment 104: Decommissioning the Jabberwocky, Pete's Punisher, Poison Oak, and Lower Marty's Trails

Why is the Forest Service proposing to decommission the Jabberwocky, Pete's Punisher, Poison Oak, & Lower Marty's Trails? These trails provide opportunities for advanced runners

¹ The miles of trails for hiker/pedestrian and bicycles summarized in Table 3-3 for Alternative 2 (i.e., 19.9) was incorrect. The correct mileage is 10.4 miles.

and mountain bikers and closing them may lead to additional illegal trail building to meet the demand for more advanced trail opportunities. [ATP-9, 15]

Response: As described in Section 1.2 of the EA (page 1-3), the purpose of the proposed action is to provide for an adequate and sustainable trail system that minimizes impacts to soil, water, cultural, vegetation and wildlife resources and discourages unauthorized trail proliferation. The Jabberwocky, Pete’s Punisher, Poison Oak and Lower Marty’s Trails would be decommissioned or rerouted under Alternatives 2 and 3 for the following reasons:

- About 95% of the trail grades along the existing alignment of the Jabberwocky Trail are unsustainable (i.e., too steep) and portions of the trail are located in Riparian Reserves.² Under Alternatives 2 and 3, the existing historic trail alignment would be rerouted out of Riparian Reserves onto an alignment consistent with the Trail Class 2 standards provided in FSH 2309.18 (see Section 2.2.3 in the EA, page 2-3).
- Trail grades associated with the Pete’s Punisher and Poison Oak Trails are too steep, and present a significant potential for continued erosion. These trails would be closed and rehabilitated. The Wonder and Not Stirred Trails, which would be constructed under Alternatives 2 and 3, would provide a loop experience in place of the Poison Oak Trail.
- The Lower Marty’s Trail above Lambs Saddle is comprised of steep, braided trails that are not sustainable. Under Alternatives 2 and 3, 0.4 mile of the existing trail alignment above Lambs Saddle would be closed and rehabilitated and replaced with a single, consolidated trail constructed at a more sustainable grade.

Please refer to Comment107 for a discussion of how the Forest Service will monitor and manage for unauthorized trail proliferation in the action area.

Comment 105: Decommissioning the Caterpillar Trail

Why is the Forest Service proposing to decommission the Caterpillar Trail? [ATP-13, 67]

Response: The Forest Service is not proposing to decommission the Caterpillar Trail. Under all alternatives, the Caterpillar Trail would remain open to all non-motorized uses (see Table 2-2 in the EA, page 2-10).

During the scoping period, some members of the public suggested removing bicycle use from the section of the Caterpillar Trail that extends from the Lizard junction to Road 2060 (i.e., the “Close the Gap” proposal), which may have been interpreted as a proposal to “decommission” the Caterpillar Trail. Please refer to Comment 203 for a discussion of the Close the Gap proposal.

Comment 106: Decommissioning the Winburn Trap Trail

Why is the Forest Service proposing to decommission the Winburn Trap Trail? This trail is an important historic trail and should be rerouted to provide pedestrian and equestrian access. The Time Warp Trail was rerouted around northern spotted owl habitat to provide access for bicycles, but the Forest Service will not make a similar accommodation on the Winburn Trap Trail for equestrians. [ATP-32, 81, 94]

² As described in Section 1.5.1 of the EA (page 1-11), Riparian Reserves (which are allocated under the Northwest Forest Plan) include lands along stream, lakes, ponds, wetlands, unstable areas, and potential unstable areas that are subject to special Standards and Guidelines designed to conserve aquatic and riparian-dependant species.

Response: The Winburn Trap Trail would be decommissioned under Alternative 3 to avoid northern spotted owl (*Strix occidentalis caurina*) nest patches and to minimize potential water quality concerns in and around Reeder Reservoir, the source of Ashland's water supply, as a result of ongoing trail use. As described in Section 3.3.3 in the EA (page 3-61), this trail is currently located within two spotted owl core areas. Increased use of this trail with no seasonal restrictions³ would likely be detrimental to spotted owl nest sites and may cause displacement of owls over the long-term. In addition, the Winburn Trap Trail accounts for about 1.3 acres of disturbance in Riparian Reserves (see Section 3.3.1, page 3-21) and provides seven stream crossings, many of which are located along an existing legacy roadbed which has an increased potential to deliver sediment to the watershed during a storm event (page 3-22). The proposal to decommission this trail under Alternative 3 reflects consideration of these combined resource concerns. Repurposing this trail solely for equestrian use would not alleviate these concerns, and would not be consistent with the purpose of the purpose action: to provide for an adequate and sustainable trail system that minimizes impacts to soil, water, cultural, vegetation, and wildlife resources.

The Upper Time Warp Trail is an existing historic trail that would become a System Trail open to bicycle uses under Alternatives 2 and 3. Approximately 1.0 miles of the existing alignment would be rerouted under Alternative 3 to avoid northern spotted owl habitat, including a nest patch (see Section 3.3.3, page 3-64). Although the trail alignment would still be located with a spotted owl core area, the potential for disturbance of a nest patch would be removed and the overall potential for disturbance of spotted owl sites reduced. There are no other resource concerns associated with this trail alignment.

Comment 107: Consideration of illegal or off-trail uses

The EA does not adequately consider the impacts of illegal or off-trail uses. Allowing bikes on the Split Rock Trail would result in additional illegal bike use on the Wagner Butte Trail, where bikes are not allowed. In addition, authorizing recreational use on trails in close proximity to sensitive resources (e.g., special-status plants along the Split Rock Trail) would increase the potential for damage to those resources from off-trail use. [ATP-83, 114]

Response: As described in Section 3.2.2 in the EA (page 3-15), the current system of trails (authorized and unapproved) is not meeting public demand and has resulted in unauthorized trail construction and off-trail uses. The addition of between 24.9 miles (Alternative 3) and 31.4 miles (Alternative 2) of new sustainable System Trails under the action alternatives, and the separation of managed uses in high use areas, would better meet public demand and lessen the probability of unauthorized trail proliferation. Moreover, proper trail design, regular maintenance, and adequate signage (including use-specific trail maps) under the action alternatives would reduce inadvertent impacts to sensitive resources from off-trail uses, and would simplify enforcement efforts within the action area. The Forest Service will continue to monitor ongoing trail uses in the action area to determine if additional management actions are necessary to address impacts associated with off-trail uses.

Please refer to the response to Comment 203 for a discussion of potential impacts on special-status plants along the Split Rock Trail and the PDC that would be implemented to minimize impacts to those species.

Comment 108: Impact to Subalpine Fir

³ Seasonal restrictions to reduce effects on northern spotted owl nest sites were considered by the IDT for routes in owl core areas; however there was low confidence that they would be effectively enforced over the long-term. Disturbance from trail use would be particularly detrimental during the breeding season (primarily March – June).

The EA does not consider impacts to subalpine fir along the Split Rock Trail. [ATP-83]

Response: The EA considers impacts to sensitive plant species and communities including federally-listed, Forest Service sensitive, Northwest Forest Plan (NWFP) Survey and Manage Species, and locally rare species of vascular plants, bryophytes, lichens or fungi (see Section 3.49 in the EA, pages 3-152 to 3-162). Subalpine fir does meet any of these criteria and, accordingly, was not specifically discussed in the EA.

Of note, implementation of PDC GEN-5 under the action alternatives would ensure that trail construction and maintenance activities avoid removal of trees with a diameter-at-breast height (dbh) greater than 6 inches. As such, it is unlikely that mature subalpine fir trees would be impacted during construction of the Split Rock Trail under Alternatives 2 or 3.

Comment 109: Unauthorized motor vehicle use on the Split Rock Trail

Authorizing the Split Rock Trail as a System Trail could invite illegal motorbike and other ATV use as the area cannot be economically patrolled on a regular basis. [ATP-83]

Response: Motorized trail uses will be governed by the Forest Service's motor vehicle use map (MVUM) which designates where motorized uses are allowed within the Forest. Persons using motorized vehicles in areas they are not allowed, including all trails within the action area, would be subject to enforcement action. Please refer to the response to Comment 107 for a discussion of how illegal or off-trail uses were considered in the EA.

Comment 110: Characterization of Potential Wilderness Areas

The EA states that an inventory of Potential Wilderness Areas (PWA) has not been completed, but goes on to state that no PWAs occur in the action area. This logic is circular in that a PWA can't be identified until an inventory has been completed, but since the inventory has not been completed, it can't definitively be stated they do not occur there. [ATP-83]

Response: As described in Section 3.4.11 in the EA (page 3-166), PWAs are identified using inventory procedures found in FSH 1909.12, Chapter 71. An inventory of PWA's has not been completed on the Rogue River-Siskiyou National Forest, so no PWAs have been identified. This statement is not intended to infer that an inventory in the future would not identify PWAs, but rather than the inventory process has not been completed.

It is important to note that PWAs do not reflect a land designation decision, do not imply or impart any particular level of management direction, are not an evaluation of potential wilderness (FSH 1909.12, Chapter 72), and are not preliminary administrative recommendations for wilderness designation (FSH 1909.12, Chapter 73). The inventory of PWAs does not change the administrative boundary of an Inventoried Roadless Area (IRA) or any congressionally designated Wilderness.

Comment 111: Availability of Biological Evaluation and Survey and Manage Reports for the Proposed Action

It is our understanding that Forest Service policy requires inclusion of a Biological Evaluation and NWFP Survey and Manage Species Reports for the proposed action be appended to the EA, or otherwise made available for public review [ATP-91, 114]

Response: Forest Service policy does not require that a Biological Evaluation or NWFP Survey and Manage Species Report be appended to an EA. The following reports were prepared for the proposed action, and are available on request from the Siskiyou Mountains Ranger District. The information provided in these reports was used to prepare the EA, and is consistent with the analysis provided in the EA.

- *Wildlife Biological Evaluation and Specialist Report, Ashland Trails Project* (Prepared by Bonnie Allison, Forest Service Wildlife Biologist)
- *Biological Evaluation for Threatened, Endangered, and Sensitive (TES) Vascular Plants, Bryophytes, Lichens and Fungi, Ashland Trails Project* (Prepared by Wayne Rolle, Forest Service Botanist)
- *Ashland Trails Project: Report on Northwest Forest Plan Survey and Manage (S&M) Fungi, Lichens, Bryophytes, and Vascular Plants* (Prepared by Wayne Rolle, Forest Service Botanist)

Comment 112: Decommissioning the Reservoir Trail

Why is the Forest Service proposing to decommission the historic trail from Ashland Creek east fork to Lambs Saddle (i.e., the Reservoir Trail)? This trail is an important part of the watershed's historic trail system. [ATP-94, 112]

Response: The Reservoir Trail would be closed and rehabilitated under Alternatives 2 and 3 to minimize potential water quality impacts to the perennial East Fork of Ashland Creek and Reeder Reservoir, the source of Ashland's water supply. This trail is also located in the Ashland Creek Research Natural Area (RNA). As described in Section 1.5.1 of the EA (page 1-11), an RNA is a Management Area allocation identified in the Rogue River National Forest Land and Resource Management Plan (LRMP) whose goal is to provide areas for research, observation and study of undisturbed ecosystems. Maintenance of natural processes within the RNA are a prime consideration, and management activities must be approved by the Director of the Pacific Northwest Research Station. The Director of the Pacific Northwest Research Station has indicated that the existing unapproved Reservoir Trail should be decommissioned in order to meet the Standards and Guidelines provide for RNAs in the LRMP.

Comment 113: Clarification of Figure 1-2

Figure 1-2 should be revised to show land allocations extending at least ½ mile beyond the Ashland Watershed boundary to better illustrate how the McDonald Peak Botanical Area would be affected by the Split Rock Trail. [ATP-114]

Response: Figure 1-2 in the EA (page 1-9) is included to illustrate the land management allocations within the approximately 12,700 acre area in the Rogue River-Siskiyou National Forest where the proposed action would be located (i.e., the action area). Although the graphic doesn't reflect the full extent of the McDonald Peak Botanical Area (which extends onto the Klamath National Forest), the analysis area considered for assessing impacts to this area is concurrent with the boundary of the botanical area (see Section 3.4.8, page 3-149).

Comment 114: Equestrian Use in the Action Area

The EA does not describe horses as the historical user of the watershed, or accurately characterize why equestrian use has declined over time and migrated to the westside of the action area (i.e., due to safety concerns associated with horse-bicycle interactions). [ATP-81]

Response: Section 3.2.1 in the EA (pages 3-3 to 3-4) describes historic recreational uses in the action area and is focused largely on infrastructure that facilitated recreational uses over time – i.e., historic trails, roads, and early Civilian Conservation Corps campgrounds and picnic grounds. Although no specific mention of equestrian use in the watershed is provided in that section, the Forest Service acknowledges that horses were used in the watershed for recreational and other purposes in the early 1900’s, as the commenter suggests. The Forest Service also acknowledges that equestrian use in the watershed has decreased over time, and migrated to the lesser-used westside of the watershed, due, in part, to concerns expressed by some equestrians about unsafe interactions between horses and bicycles.

Appreciating the potential for user conflicts in general, including conflicts between equestrians and bicycles, the alternatives considered in the EA consider various trail configurations to disperse and separate uses. Please refer to the response to Comment 102.

Comment 115: Public comments provided during February 2011 trail development meetings

The City of Ashland held two meetings in February 2011 to solicit comments from users on the AWTAs Trails Master Plan. Those comments were largely ignored by the Forest Service, which is inappropriate given the Memorandum of Understanding (MOU) between the City and Forest Service. [ATP-81]

Response: The February 2011 meetings were hosted by AWTAs, not the City of Ashland, to solicit input on the initial draft of their Trails Master Plan. The Forest Service reviewed these comments both during scoping and in comments provided on the Draft EA.⁴ However, because specific information on the commenter and the context in which the comments were provided was not apparent (i.e., specific to the Forest Service proposed action), these comments were not considered substantive to the EA analysis.

As described in Section 1.6.3 in the EA (pages 1-15 to 1-16), the MOU between the City and Forest Service defines the roles and responsibilities of both jurisdictions in the management of the Ashland Watershed. It provides the City an opportunity to offer input to the Forest Service during planning, implementation, and management review of projects in the watershed. In accordance with the MOU, Forest Service staff have met with City staff on several occasions during development of the EA analysis to discuss proposed trail alignments, managed uses, and potential conflicts with the City trail system.

Comment 116: Allowed uses on the Horn Gap Trail

The Horn Gap Trail has always had the designation as a hiker/equestrian trail that is not open to bikes. This is evidenced in the trail markers at the top of the trail where the traditional metal trail symbols of a hiker and horse are attached to a wood sign, as well as a bike sign with a slash on it. Recently, a new sign has been erected indicating “it isn’t recommended horsemen use it”. Alternatives 2 and 3 would officially open the trail to bicycle use, which would eliminate an opportunity for equestrians to ride without bikes on the west side of the action area. [ATP-81]

Response: The Horn Gap Trail is an existing System Trail that was constructed in 1993 as a “tie trail” to create loop trails for mountain bikers off of Road 2060. It has historically been used by mountain bikers and pedestrians, with equestrian use not recommended. However, since it was

⁴ In both cases, these comments were appended to the Safe Trails Plan proposal provided by Joy Trevey-Lowell on behalf of equestrian users groups.

constructed, Road 2060 has been gated and use of the Horn Gap Trail by downhill mountain bikes has decreased due to access being more difficult. The Horn Gap Trail now provides a good trail opportunity for all uses.

The EA did not analyze or propose any changes to current uses on the Horn Gap Trail. No official Forest Service signage has been placed on this trail recently, including any signs discouraging horse use or excluding bike use. In all cases, following a final decision on the proposed action, inaccurate signage on existing and any new System Trails would be removed and updated by the Forest Service, as appropriate.

The commenter is correct that under all alternatives, the Horn Gap Trail would remain open to all non-motorized uses, including equestrian uses. Opportunities for equestrians to use trails separate from bicycles would be provided on the Ric's, Red Queen, Lewis Loop, and Bandersnatch Trails under Alternatives 2 and 3. Although other trails on the west side of the action area (e.g., Split Rock or Wagner Glade Trails) authorized under the action alternatives would not separate uses, they would disperse use away from the City of Ashland, where the potential for horses and bikes to interact would be less because there would be fewer users.

Comment 117: Process used to select trails for proposed decommissioning

All trails proposed for decommissioning in the watershed under Alternative 3 are bike trails not horse trails. [ATP-81]

Response: The trails proposed for decommissioning under Alternatives 2 and 3 were specifically identified for closure and rehabilitation by the Interdisciplinary Team (IDT) because their design is not sustainable (i.e., use is resulting in unacceptable adverse impacts to soil, water, cultural, vegetation, and wildlife resources) or they do not offer a desirable recreation opportunity. Trails were not selected for decommissioning based on presumed or dominant use.

Please refer to the response to Comment 104 for a discussion of why the Lower Marty's, Jabberwocky, Pete's Punisher, and Poison Oak Trails would be decommissioned under Alternatives 2 and 3. The responses to Comments 103 and 112 describe why the Winburn Trap and Reservoir Trails would be decommissioned under the action alternatives, respectively.

Comment 118: Preferential treatment of certain users groups

Several trails were realigned to avoid sensitive resources to allow continued bicycle use while similar accommodations were not made for other user groups. For example, the Jabberwocky Trail was redesigned to allow continued mountain bike use but a proposal to allow a trail from Red Queen to Lewis Loop for equestrian use was not considered. Please clarify why one user has preferential treatment. [ATP-81]

Response: In all cases, proposed trail designs and locations considered resource constraints, including potential impacts to soil, water, cultural, vegetation, and wildlife resources. The Jabberwocky Trail was relocated to avoid Riparian Reserves and lessen the trail grade. A new trail between Red Queen and Lewis Loop was not proposed because all possible alignments would bisect Riparian Reserves and Pacific fisher (*Pekania pennanti* [formerly *Martes pennanti*]) habitat.

Please refer to the response to Comment 102 for a discussion of how managed uses were considered in developing the action alternatives.

Comment 201: Equestrian safety concerns in the area of Red Queen Trail

In the Safe Trails Plan provided to the Forest Service during public scoping, equestrian groups identified safety concerns in the area of the Red Queen Trail that were not addressed in the EA. Specifically, they stated the proposed convergence of the Red Queen, Alice in Wonderland, Jabberwocky, and Lizard Trails offered no safe opportunity for horses to access the Lewis Loop Trail without interacting with bicycles, some of which would be travelling downhill at speed. Re-designating the lower section of the Caterpillar Trail for pedestrian / equestrian uses would provide the needed safe connection between the Red Queen and Lewis Loop Trails. This suggestion was referred to as the “Close the Gap” proposal at the public comment meeting on February 6, 2015, and in many comments received during the public comment period on the EA. [ATP-12, 19]

Response: In developing the alignments and proposed uses for the trails in this area, the Forest Service anticipated the majority of bike traffic that currently use the Caterpillar Trail would be redirected to the Lizard Trail, which would be designed to better accommodate bikes (e.g., fewer switchbacks). Commenters, through the “Close the Gap” proposal, have suggested modifications that would provide a contiguous no-bike trail from the Red Queen Trail, via the Caterpillar Trail, to the Lewis Loop Trail. The Responsible Official will consider this proposal and other safety concerns in her decision on the proposed action.

Comment 202: Seasonal restrictions to limit erosion and trail damage

The EA did not consider seasonal restrictions (e.g., closing trails in wet winter months) to limit erosion and trail damage from bikes. [ATP-31]

Response: The EA did not consider seasonal restrictions on any recreational uses because, outside of trails proposed for decommissioning, trail conditions in the action area are not so degraded that closing trails seasonally is necessary or warranted. As described in Section 3.4.2 in the EA (page 3-113), soils in the action area are generally comprised of decomposed granite and are typically well to excessively drained. The location and design of most trails further minimizes the potential for erosion, rilling, and/or ponding, which limits damage to trails during wet periods. Seasonal restrictions are also difficult to enforce. The Forest Service will monitor trails conditions and uses in the action area to determine if seasonal restrictions (or other types of management actions) become necessary in the future to maintain a sustainable trail system.

Comment 203: Impacts to monument plant and Howell’s tauschia

The EA did not adequately consider impacts to monument plant (*Swertia radiata*) and Howell’s tauschia (*tauschia howelli*) along the Split Rock Trail, particularly considering the potential for increased off-trail uses. [ATP-83]

Response: Impacts to both monument plant and Howell’s tauschia are considered in Section 3.59 of the Draft EA, Specifically, as described on page 3-152, Howell’s tauschia is considered an extremely rare species whose habitat is specialized and easily disturbed. It is known to occur near the south end of the Split Rock Trail, as well as the east side of the summit of McDonald Peak. The EA acknowledges that under both action alternatives, tauschia could be impacted if the Split Rock Trail alignment isn’t carefully routed, or if recreational users stray from the established trail alignment (see page 3-158). The IDT identified two PDC to reduce these potential impacts to tauschia. PDC BOT-1

and BOT-2 would require that the route of the reestablished Split Rock Trail be chosen to minimize impacts to Howell's tauschia at its south end and to avoid impacts at McDonald Peak. PDC BOT-1 would also require that ancillary measures, such as rock-lined borders or signs, be considered to discourage trail users from leaving the trail and potentially disturbing the tauschia populations at this location.

Section 3.4.9 also discusses monument plant, and potential impacts to this species under the action alternatives. As described on page 3-155 of the Draft EA, monument plant is regularly encountered in the Siskiyou Mountains along the ridge from the McDonald Peak vicinity to about 1 mile north of Wagner Butte. Potential impacts to monument plant in the vicinity of the Split Rock Trail would be minimized by implementing PDC BOT-4, which would require the Forest Service botanist to assist in reestablishing the trail route where it may pass through or near patches of monument plant. With implementation of this PDC, impacts would be limited to the loss of a few individuals along the Split Rock Trail, which would have no effect on the local viability of the species (see page 3-160).

Please refer to the response to Comment 107 for a discussion of illegal or off-trail uses.

Comment 204: Consideration of unleashed dogs

The EA did not consider the impact of unleashed dogs which intensifies potential use conflicts between all groups and wildlife. [ATP-94]

Response: Section 3.3.2 in the EA (pages 3-45 to 3-46) describes the potential effects of disturbance to wildlife from non-motorized recreation, including disturbance specifically associated with dog presence. As described in that section, human recreation in general and dog presence in particular has been associated with reduced carnivore abundance, habitat avoidance, direct and indirect mortality, and disruption of normal activities (e.g., feeding, resting). In fact, under both action alternatives, several trails were either proposed to be rerouted or decommissioned specifically to avoid and minimize potential impacts to wildlife from continued recreational use, including adverse interactions with dogs.

There are no specific regulations that prohibit dogs in the action area, or require that dogs be maintained on leash. Under Alternatives 2 and 3, the Forest Service would install signage at trailheads describing trail etiquette, including suggestions that dogs be kept on leash or under verbal control. In addition, Forest Service staff will continue to monitor use in the action area to determine if additional restrictions on dog use are necessary in the future.

Comment 205: Impacts on McDonald Peak Botanical Area

Section 3.4.8 in the EA (page 3-152) includes the following statement in the discussion of impacts to the McDonald Peak Botanical Area under Alternative 2: "Maintenance and management of this trail [Split Rock Trail] as a System Trail would reduce potential adverse effects on the Botanical Area from unapproved use." The statement is unsupported by evidence or rationale in this section or elsewhere in the EA. If the Forest Service insists on including this statement in the EA, we request that evidence and/or rationale be provided. The reference to PDCs in this section is also off-topic and does not support the untrue statement opening the paragraph. [ATP-114]

Response: Section 3.4.8 (page 3-151) in the EA describes that dispersed recreational uses in the botanical area are likely to increase over time due to population growth, even if the Split Rock Trail is not authorized as a System Trail under the proposed action. The statement on page 3-152 is intended to reflect that the establishment and maintenance of a single trail alignment along the

ridgeline in this area would consolidate use and limit direct impacts to botanical resources as more people use the area in the future. The specific PDC referenced in the section summarizes measures that would be implemented to protect sensitive botanical resources along the Split Rock Trail if it authorized as a System Trail, as well as measures to reduce the likelihood that users would leave the trail once it is established. It is also important to note that this section acknowledges that impacts to the botanical area under the action alternatives could be more substantial than under Alternative 1 (No Action), where the Split Rock Trail would not be reestablished and use of the historic alignment would likely be lower than if it were established as a System Trail.

The Responsible Official will consider potential impacts to the McDonald Peak Botanical Area when making a final decision on the proposed action.

Substantive Comments – Possible Alternative Configurations or Reroutes

Comment 301: Reroute Wagner Glade Trail

One commenter suggested the Wagner Glade Trail be rerouted to make the alignment more sustainable. [ATP-7]

Response: If the Wagner Glade Trail is authorized as a System Trail under Alternatives 2 or 3, small segments of the existing historic alignment would be rerouted to establish breaks in the grade where the trail is particularly steep. Rolling dips may also be installed in areas where there is a long run between drainage features.

Comment 302: Proposed Alternate Configuration of Managed Uses

Many commenters provided suggested changes to managed use configurations for specific trails, or suggested certain uses be allowed in one direction only. [ATP-8, 11, 12, 13, 16, 17, 18, 19, 20, 21, 24, 26, 27, 28, 29, 33, 34, 35, 37, 38, 40, 42, 43, 45, 47, 49, 50, 53, 54, 56, 58, 59, 62, 63, 64, 65, 66, 68, 69,70, 71, 72, 74, 75, 76, 78, 79, 81, 82, 83, 88, 89, 92, 95, 96, 98, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 112, 114, 115,118]

Response: As defined in Section 2.2.2 in the EA (page 2-2), *managed use* refers to the mode(s) of travel that are actively managed and appropriate for a trail based on its design. There can be more than one managed use for a trail, and managed uses are often a subset of *allowed uses*. For example, on a trail that is closed to all motorized use, the managed use could include hiker/pedestrian and equestrian uses, while the allowed uses may also include bicycles.

Table 2 summarizes the alternate use configurations for specific trail alignments suggested by commenters, as well as the proposed managed uses for trails under each of the alternatives considered in the EA. The table also provides a brief discussion articulating the rationale behind the proposed managed uses provided in the EA. The Responsible Official will consider proposed alternate uses configurations when making a final decision on the proposed action.

Table 2. Proposed Alternate Configurations of Managed Uses by Trail

Trail Name	Alternative 1 ¹	Alternative 2	Alternative 3	Proposed Alternate Managed Uses	Discussion
Caterpillar	All non-motorized uses			<ul style="list-style-type: none"> ▪ Pedestrian only ▪ Pedestrian and equestrian only 	Please refer to the response to Comment 201 for a discussion of alternate uses proposed for the Caterpillar Trail.
Catwalk	All non-motorized uses			<ul style="list-style-type: none"> ▪ Bike only ▪ Bike only, one direction (downhill) ▪ All non-motorized uses, one direction (downhill) 	The Catwalk Trail is currently regularly used by both pedestrians and bicycles. Designating it as a bicycle trail would conflict with long standing use patterns in the area, and present additional enforcement and user conflict concerns.
Toothpick	All non-motorized uses			<ul style="list-style-type: none"> ▪ Pedestrian and equestrian only 	Bikes currently use the Toothpick Trail to access the Caterpillar Trail. Removing bikes as a managed use would detrimentally affect a large portion of the current use by requiring bikes to go down Tolman Creek Road, rather than the preferred route of continuing on the Toothpick Trail to the Caterpillar Trail.
Upper Horn Gap	All non-motorized uses			<ul style="list-style-type: none"> ▪ Pedestrian and equestrian only 	Please refer to the response to Comment 116.
Alice in Wonderland	All non-motorized uses	Bike	Bike	<ul style="list-style-type: none"> ▪ All non-motorized uses 	The Alice in Wonderland Trail has historically been open to all uses and is an important link to the trail system.
Upper Time Warp	None	Bike	Bike	<ul style="list-style-type: none"> ▪ Pedestrian and Equestrian 	The Upper Time Warp Trail is currently primarily used by downhill mountain bikes. Allowing pedestrians and equestrians on Upper Time Warp may result in user conflict.
Wagner Glade	None	All non-motorized uses	All non-motorized uses	<ul style="list-style-type: none"> ▪ Pedestrian only 	The Wagner Glade Trail would disperse use to the west side of the action area, and provide an opportunity for access to more remote / lesser used areas. It would also provide a loop opportunity with the Split Rock Trail.

Trail Name	Alternative 1 ¹	Alternative 2	Alternative 3	Proposed Alternate Managed Uses	Discussion
Winburn Trap	<i>None</i>	All non-motorized uses	<i>Decommissioned</i>	<ul style="list-style-type: none"> ▪ Pedestrian and equestrian only 	Please refer to the response to Comment 106.
Split Rock	<i>None</i>	All non-motorized uses	All-non motorized uses	<ul style="list-style-type: none"> ▪ Pedestrian only ▪ Pedestrian and equestrian only 	The Split Rock Trail would disperse use to the west side of the action area, and provide an opportunity for access to more remote / lesser used areas.
Lower Marty's	<i>None</i>	Pedestrian and bike	Pedestrian and bike	None	--
Jabberwocky	<i>None</i>	Pedestrian and bike	Pedestrian and bike	<ul style="list-style-type: none"> ▪ Bike only ▪ Bike only, one direction (downhill) ▪ Pedestrian and bikes, one direction (downhill) 	The Jabberwocky Trail is currently primarily used as a bike trail, with some pedestrian use.
Fell on Knee	<i>None</i>	Pedestrian and bike	Pedestrian and bike	None	--
Upper Missing Link	<i>None</i>	Pedestrian and bike	Pedestrian and bike	<ul style="list-style-type: none"> ▪ Bike only ▪ Bike only, one direction (downhill) ▪ Pedestrian and bikes, one direction (downhill) ▪ Pedestrian only 	The Upper Missing Link Trail is currently primarily used as a bike trail, with some pedestrian use.
Lower Missing Link	<i>None</i>	Pedestrian and bike	Pedestrian and bike	<ul style="list-style-type: none"> ▪ Bike only ▪ Bike only, one direction (downhill) ▪ Pedestrian and bikes, one direction (downhill) 	The Lower Missing Link Trail is currently primarily used as a bike trail, with some pedestrian use.
No Candies	<i>None</i>	Pedestrian and bike	Pedestrian and bike	<ul style="list-style-type: none"> ▪ All non-motorized uses 	The design and alignment of this trail – which is twisty and narrow with very limited site distance – is not best suited to a multiple use trail accommodating equestrians.
Upper Eastview	<i>None</i>	All non-motorized uses	All non-motorized uses	None	--
Chain Saw	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	None	--
Epstein Cut-Off	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	None	--
Insane Drop	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	None	--
Offshoot	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	None	--
Pete's Punisher	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	<ul style="list-style-type: none"> ▪ Pedestrian and equestrian only on upper 1 mile; decommission lower 0.3 mile 	Please refer to the response to Comment 104 for a discussion of why the Pete's Punisher Trail would be

Trail Name	Alternative 1 ¹	Alternative 2	Alternative 3	Proposed Alternate Managed Uses	Discussion
				<ul style="list-style-type: none"> All non-motorized uses 	decommissioned under Alternatives 2 and 3.
Poison Oak	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	<ul style="list-style-type: none"> All non-motorized uses 	Please refer to the response to Comment 104 for a discussion of why the Poison Oak Trail would be decommissioned under Alternatives 2 and 3.
Reservoir (East Fork)	<i>None</i>	<i>Decommissioned</i>	<i>Decommissioned</i>	<ul style="list-style-type: none"> All non-motorized uses Pedestrian only 	Please refer to the response to Comment 112 for a discussion of why the Reservoir Trail would be decommissioned under Alternatives 2 and 3.
Ric's	<i>None</i>	Pedestrian and equestrian	Pedestrian and equestrian	<ul style="list-style-type: none"> Pedestrian only Pedestrian and bikes only Lower Ric's – bike only; Upper Ric's – pedestrian and equestrian only 	The proposal to designate Ric's Trail as a pedestrian and equestrian trail was made, in part, to provide hikers and runners an option for accessing the 4 Corners Trailhead off Tolman Creek Road without the potential for conflict with bicycles and encroachment onto private property. Designating Ric's Trail as a bicycle trail would conflict with long standing use patterns in the area, and present additional enforcement and user conflict concerns.
Freak Went Flyer	<i>None</i>	Bike	<i>Not constructed</i>	None	--
RIP 1	<i>None</i>	Bike	<i>Not constructed</i>	None	--
Wonder	<i>None</i>	Pedestrian and bike	Pedestrian and bike	<ul style="list-style-type: none"> All non-motorized uses All non-motorized uses, bikes one direction (uphill) Pedestrian and equestrian only 	The proposal to limit the Wonder Trail to pedestrians and bikes was based on a lack of adequate locations for other users to pass equestrians on trail due to limited visibility and steep side slopes, and in recognition that the gated Road 2060 provides access for many users to the westside of the watershed.
Red Queen	<i>None</i>	Pedestrian and	Pedestrian and	<ul style="list-style-type: none"> Pedestrian and bike only 	The Red Queen Trail would provide a

Trail Name	Alternative 1 ¹	Alternative 2	Alternative 3	Proposed Alternate Managed Uses	Discussion
		equestrian	equestrian	<ul style="list-style-type: none"> ▪ Pedestrian only 	bike-free opportunity for equestrians and pedestrians to access the Bandersnatch Trail on City lands. Bikes would be restricted to the Jabberwocky Trail to separate uses in this heavily used area.
Lewis Loop	<i>None</i>	Pedestrian and equestrian	Pedestrian and equestrian	None	--
Shaken	<i>None</i>	All non-motorized uses	All non-motorized uses	None	--
Not Stirred	<i>None</i>	Pedestrian and bike	Pedestrian and bike	<ul style="list-style-type: none"> ▪ Bike only 	The Not Stirred Trail would provide an opportunity for multi-use access on the westside of the action area, where use and user conflict are generally much lower due to limited access.
Lizard	<i>None</i>	Bike	Bike	None	--
Bandersnatch	<i>None</i>	Pedestrian and equestrian	Pedestrian and equestrian	None	--
¹ Uses are not managed for these trails under Alternative 1 because they are – and would not become - System Trails subject to Forest Service management.					

Comment 303: Authorization of Split Rock Trail

Several commenters suggested the Split Rock Trail should not be authorized as a System Trail under any of the alternatives (i.e., there should be no improvement of the existing condition). Reasons cited include the need for preserving trail-less backcountry areas; potential impacts to rare plants and wildflowers; difficulties in monitoring and enforcing uses in the area; and the potential for bicycles to use the trail to create other unauthorized trails downhill from the ridgeline. [ATP-14, 23, 57, 86, 91, 116, 117]

Response: The Split Rock Trail is proposed as a System Trail under Alternatives 2 and 3 to disperse use to the west side of the watershed. There are currently several braided trails located in the general vicinity of the Split Rock Trail, and dispersed use is anticipated to increase in the future, even if the Split Rock Trail is not authorized as a System Trail. Providing a single trail alignment along the ridgeline in this area would consolidate use and limit direct impacts to botanical resources as more people use the area in the future.

Please refer to the responses to Comment 107 for consideration of illegal and off-trail uses in the action area (including commitments to ongoing monitoring and enforcement); Comment 203 for a discussion of impacts to rare plants adjacent to the Split Rock Trail; and Comment 302 for a discussion of alternate trail uses considered for the Split Rock Trail.

The Responsible Official will consider all impacts associated with the Split Rock Trail when making a final decision on the proposed action.

Comment 304: Authorization of Upper Time Warp Trail

One commenter suggested the Upper Time Warp Trail should not be authorized as a System Trail under any of the alternatives due to potential adverse impacts on botanical resources and roadless area values. [ATP-116]

Response: As described in Section 3.4.12 in the EA (page 3-172), the Upper Time Warp Trail is an existing historic trail that was in existence as the Mt. Ashland Trail and part of the Forest Service trail system until 1954. Under Alternatives 2 and 3, the Upper Time Warp Trail would be authorized as a System Trail to disperse use to the west side of the watershed. Approximately 1.0 mile of the existing alignment would be rerouted under Alternative 3 to avoid northern spotted owl habitat.

Although this popular downhill mountain bike trail is currently maintained by local mountain bike groups and AWTA as a System Trail, the Forest Service would be responsible for ensuring it is sustainably constructed and used. PDC BOT-5 would require the Forest Service to periodically monitor the first ½ mile of the trail alignment to make sure recreational users trying to avoid lingering snowfield on the trail do not create braided routes and/or unduly disturb population of Henderson's horkelia or Mt. Ashland lupine (*Lupinus aridus* ssp. *ashlandensis*). Preventative measures, such as early season closure or awareness signs, would also be considered if warranted.

Potential effects on the McDonald Peak IRA are described in Section 3.4.11 of the EA (pages 3-164 to 3-168). The addition of the Upper Time Warp, Split Rock, and Wagner Glade Trails as authorized System Trails under Alternatives 2 and 3 would increase the trail area within the IRA by approximately 9.2 miles or 5.57 acres (Alternative 2) or 8.8 miles or 5.33 acres (Alternative 3). This would likely result in increased use in the IRA, which could impact existing opportunities for solitude, quiet, and dispersed recreation.

The Responsible Official will consider all impacts to the IRA and other resources impacted by authorization of the Upper Time Warp Trail when making a final decision on the proposed action.

Substantive Comments - Other

Comment #401: Trail design and signage

Several commenters suggested that better trail design and signage would improve safety conditions and reduce resource damage in the action area. [ATP-16, 17, 18, 21, 26, 29, 33, 34, 38, 57, 58, 59, 62, 63, 65, 66, 69, 70, 71, 72, 74, 76, 78, 88, 91, 92, 96]

Response: Section 2.2.3 in the EA (pages 2-2 to 2-4) summarizes the design parameters that would be used to construct and maintain all trails in the action area, including tread width, clearing limit, target grade, surface material, and slope alignment. All trails would be designed, constructed, and maintained to the Trail Class 2 standards provided in the *Trails Management Handbook*, FSH 2309.18. The Forest Service will also consider trail specific conditions, topography, and other factors (such as mitigation of site-specific safety concerns or adjustments to accommodate other resource concerns) in siting and constructing trails under the proposed action.

All trails will be signed with uses that are excluded and multiuse trails will be signed with trail etiquette guidelines to reduce user conflict (see PDC GEN-10). In addition, the Forest Service will work closely with user groups and the City of Ashland to develop a revised trail map that clearly illustrates managed uses in the action area.

**ASHLAND TRAILS PROJECT
DRAFT DECISION NOTICE AND FINDING OF NO SIGNIFICANT
IMPACT**

ATTACHMENT B

**Draft Environmental Assessment
Errata**

Changes, corrections, and clarifications have been made to the Ashland Trails Project Draft Environmental Assessment (EA) based on public and agency comment and internal review by the U.S. Forest Service (Forest Service). The changes were made to improve the consistency, clarity, and intent of the information provided in the Draft EA, and to respond to comments on the EA analysis. These changes, which are summarized in Table 1, are within the scope and analysis of the Draft EA and do not change the Forest Service's consideration or conclusions regarding the environmental consequences of the proposed action or alternatives.

Changes reflected in *bold and italics* in Table 1 represent additions to the text in the Draft EA; changes reflected as ~~striketrough~~ represent deletions from the text.

The Draft EA and responses to comments on the Draft EA are available for review in the project record at the Star Ranger Station, Jacksonville, Oregon, and will be posted on the project website for public review (<http://www.fs.usda.gov/project/?project=39748>).

Table 1. Ashland Trails Project Draft EA Errata

Page	Section	Errata
Figure 1-2	1.5, Management Direction	Figure 1-2 notes the entire National Forest lands lie within Late Successional Reserve land allocation. This statement should be clarified to reflect that some small pockets of land within the boundary are not within the LSR (e.g., are administratively withdrawn, etc.) (see Figure 3-4).
1-1	1.1, Background	Second paragraph: "This increase in use has resulted in increased user conflicts, particularly in the vicinity of the City of Ashland, were where the majority..."
1-11	1.5.1, Management Allocation, Footnote 1	"Although MS-25 MA-25 is actually identified..."
1-13	1.5.1, Management Allocation, Klamath National Forest Land Resources Management Plan	The citation for the quoted Standards and Guidelines for the Klamath National Forest LRMP should be USDA Forest Service 1995b 1995a , 4-85
2-12	2.3.2, Alternative 2 - Proposed Action	First paragraph, first sentence: "Approximately 30.9 miles 31.4 miles of trails would be incorporated into the approved trail network in the action area under this alternative including 21.5 miles 22.0 miles of existing historic and unapproved trails and 9.4 miles of new proposed trails."
2-12	Table 2-4	Jabberwocky - Length = 1.2 miles 1.7 mile ; Total = 30.9 miles 31.4 miles
2-23	Table 2-8	Alternative 2 Existing Historic / Unapproved Trails = 21.5 miles 22.0 miles ; Total = 46.7 miles 47.2 miles
2-23	Table 2-8	Purpose and Need Element: Provide a Sustainable Non-Motorized Trail System - Alternative 2: " 21.5 miles 22.0 miles of existing historic trails..."
2-24	Table 2-8	Purpose and Need Element: Provide a Trail System Commensurate with Public Demand - Alternative 2: " <u>Total System Trails: 46.7 miles 47.2 miles</u> "
2-24	Table 2-8	Purpose and Need Element: Reduce User Conflict - Alternative 2: "Total miles by managed use would include... 19.9 miles 10.4 miles hiker/pedestrian and bike only uses..."
2-25	Table 2-8	Purpose and Need Element: Reduce Unapproved Trail Proliferation - Alternative 2: "Similar to Alternative 2, although total addition to System Trail mileage would be less (30.9 miles 31.4 miles)."
2-26	Table 2-8	Effects on Water Quality Due to Erosion and Sediment Delivery: Exceedance of TMDL - Alternative 1: "...TMDL load allocations could be exceeded during flood events if legacy stream crossings fail."
2-28	Section 2.5.1, Project Design Criteria and Mitigation Measures	"Project design criteria...were developed by the IDT to address site-specific environmental site-specific environmental concerns..."
2-36	Section 2.6.2, Safe Trails Plan Alternative	First paragraph, fourth sentence: "Similarly, the Windburn Trap Trail would be decommissioned under Alternative 3 due to its proximity to spotted owl nest sites, and to minimize potential water quality concerns in and around Reeder Reservoir, the source of Ashland's water supply, as a result of ongoing trail use. "
3-1	Section 3.1.2, Alternatives Evaluated	First paragraph, second sentence: "As required by...NEPA, Alternative 1, which indicates what would happen if the proposed action were not taken, and provides a baseline to evaluate the impacts of the action alternatives."
3-2	Table 3-1	Describing the Ashland Forest Resiliency Project: "Implementation of this project began in the spring of

Page	Section	Errata
		2010."
3-6	Table 3-2	System Trails - Alternative 2 - 46.7 miles 47.2 miles ; Total miles - 46.7 miles 47.2 miles
3-6	Table 3-2, Footnote 2	"System Trails are trails that are part of approved trails in the action area, and that are currently managed by the Forest Service in accordance with current management plans and FSH 2309.18."
3-11	3.2.1, Background - User Conflict	Second paragraph, second sentence: "Trails on the east side of the Ashland watershed can be accessed through six locations: the White Rabbit trailhead; the White Rabbit Trail from the Siskiyou Mountain Park; the Toothpick Trail from the Tolman Creek Road; the Coggins Saddle (Four Corners) trailhead; the Upper and Lower Eastview Trailheads ; the Bull Gap (Lower) trailhead; and the Upper Bull Gap/Mt. Ashland Ski area Trailhead (Figure 2-3). Access to the trail system is also provided at locations outside of the Forest boundary, including at the White Rabbit Trail from Siskiyou Mountain Park and the Toothpick Trail from Tolman Creek Road.
3-12	3.2.2, Purpose and Need Elements - Provide a Sustainable Non-Motorized Trail System	First paragraph, second sentence: "All of these trails, with the exception of the Reservoir Trail and several trails that would be closed under Alternative 3 to avoid northern spotted owl (<i>Strix occidentalis caurina</i>) and Pacific fisher (<i>Pekania pennanti</i>) habitat, and minimize potential effects on Late-Successional Reserve (LSR) function... "
3-12	3.2.2, Purpose and Need Elements - Provide a Sustainable Non-Motorized Trail System	Second paragraph, second sentence: "Under Alternative 2, 21.5 miles 22.0 miles of existing historic and existing unapproved trails would be authorized as System Trails...."
3-12	3.2.2, Purpose and Need Elements - Provide a Trail System Commensurate with Current Public Demand	Second paragraph, third sentence: "Under Alternative 2, a total of 46.7 miles 47.2 miles of System Trails would be authorized in the action area...."
3-13	3.2.2, Purpose and Need Elements - Reduce User Conflict	First paragraph, second sentence: " As described above, both action alternatives would increase the mileage of System Trails in the action area compared to Alternative 1 by between 24.9 miles (Alternative 3) and 30.9 miles 31.4 miles (Alternative 2)."
3-13	3.2.2, Purpose and Need Elements - Reduce User Conflict	Second paragraph, fourth sentence: "Further out, the Split Rock.....and Upper Time Warp (Alternative 2 only) Trails..."
3-13	3.2.2, Purpose and Need Elements - Reduce User Conflict	Fourth paragraph, third sentence: "Under the action alternatives...about 21% 22% (Alternative 2) and 23% (Alternative 3) would be managed for hiker/pedestrian and bicycle use...."
3-14	Table 3-3	Alternative 2: (1) All Non-Motorized Uses: 26.9 miles, 57.6% 57.0% ; (2) Hiker/Pedestrian, Bicycle: 19.9 miles 10.4 miles, 23.4% 22.0% ; (3) Hiker/Pedestrian, Equestrian: 4.0 miles, 8.6% 8.5% ; (4) Bicycle: 5.9 miles 12.6% 12.5% ; TOTAL 46.7 miles 47.2 miles
3-15	3.2.2, Purpose and Need Elements - Reduce Unapproved Trail Proliferation	Second paragraph, third sentence: "The addition of between 24.9 miles (Alternative 3) and 30.9 miles 31.4 miles (Alternative 2)...."
3-25	Figure3-3b	Photo 10: "Approximate location of the Not Stirred trail crossing of a perennial stream/wetland proposed under Alternative B Alternative 2 . Trail would not cross stream under Alternative C Alternative 3. "
3-21	Section 3.3.1, Issue: Potential Effects	Second paragraph, third sentence: "Of the subwatersheds in the action area, Ashland Creek contains

Page	Section	Errata
	on Water Quality Due to Erosion and Sediment Delivery, Existing Trail Conditions	approximately 74% of the existing existing historic...."
3-22	Section 3.3.1, Issue: Potential Effects on Water Quality Due to Erosion and Sediment Delivery, Existing Trail Conditions	First paragraph after Table 3-7, last sentence: " Appendix B summarizes the results of the WEPP prediction model. " The results of the WEPP prediction model were not included as an appendix to the EA, but can be made available on request.
3-30	Section 3.3.1, Issue: Potential Effects on Water Quality Due to Erosion and Sediment Delivery, Alternative 2, Erosion and Sediment Delivery	Last paragraph, third sentence: "When compared to Alternative 1, Alternative 2 would result in a long-term..."
3-31	Section 3.3.1, Issue: Potential Effects on Water Quality Due to Erosion and Sediment Delivery, Alternative 2, Erosion and Sediment Delivery	First paragraph, first sentence: "Riparian Reserve disturbance according to proposed managed under Alternative 2 is summarized..."
3-31	Section 3.3.1, Issue: Potential Effects on Water Quality Due to Erosion and Sediment Delivery, Alternative 2, Erosion and Sediment Delivery	First paragraph, first complete sentence: "Literature reviews..... (...Cole and Spildie 1995 1998 ...)"
3-39	Section 3.3.1, Issue: Potential Effects on Water Quality Due to Erosion and Sediment Delivery, Alternative 3, Cumulative Effects	First full paragraph, fifth sentence: "As noted above....to coordinate proposed changes to the Forestry Service trail system."
3-45	Section 3.3.2, Issue: Potential Effects on Late-Successional Reserves, Effects Mechanisms and Analytic Framework	Second paragraph, last sentence: "This information also informs the analysis provided in Sections 3.3.4, 3.3.5, and 3.3.6 Sections 3.3.3, 3.3.4 and 3.4.1. "
3-48	Section 3.3.2, Issue: Potential Effects on Late-Successional Reserves, Alternative 2, Direct and Indirect Effects	First paragraph, first sentence: "Alternative 2 would result in authorization of 30.9 miles 31.4 miles of new System Trails, including 8.7 miles 9.2 miles of existing unapproved trails..."
3-51	Section 3.3.2, Issue: Potential Effects on Late-Successional Reserves, Cumulative Effects	Fourth paragraph, fourth sentence: "The nearest existing, non-System Trail to the Mt. Ashland ski area..."
3-52	Section 3.3.2, Issue: Potential Effects on Late-Successional Reserves, Summary	First paragraph, last sentence: "The net effect of the Preferred Alternative Alternative 3 when compared to existing conditions, the No Action Alternative Alternative 1 , and Proposed Action Alternative Alternative 2 , is considered neutral to LSR values."

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3-64	Section 3.3.3, Issue: Potential Effects on Northern Spotted Owl and Their Habitat, Alternative 3, Direct and Indirect Effects	First paragraph, second sentence: "The Winburn Trap Trail would not be authorized for recreational use under this alternative, which would remove ongoing disturbance to known owl nest sites in the vicinity, which would and reduce impacts to spotted owls compared to Alternatives 1 and 2."
3-67	Section 3.3.3, Issue: Potential Effects on Northern Spotted Owl and Their Habitat, Summary	First paragraph, last sentence: "Refer to Sections 3.3.4 through 3.3.6 Sections 3.3.4 and 3.4.1 for the supporting analysis specific to the other species listed in Table 3-29."
3-70	Section 3.3.4, Issue: Potential Effects on Pacific Fisher and Their Habitat, Status, Distribution, and Occurrence within the Analysis Area	First paragraph, last sentence: "Two recent surveys that have.....(Aubry et al. 2005, Farber and Criss 2005 2006)."
3-79	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Background	Third paragraph, first sentence: "The following provides a summary of the management direction specific to the noted "special-status" species with in the analysis area..."
3-83	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Survey and Manage Species	First paragraph, last sentence: "Management recommendations for the known sites of Chase Chace sideband..."
3-86	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Northern Bald Eagle	Third paragraph, first sentence: "An active bald eagle nest (Nest 1034) is located east of the action area on BLM managed lands around Emigrant Lake the The nest is located..."
3-87	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Travelling Sideband	First paragraph, second sentence: "It can be found in in basal t talus and rock outcrops..."
3-88	Section 3.4.1, Issue: Potential Effects	First paragraph, second sentence: "Today it is found in....(Frest and Johannes 1996 1995 ...)."

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	on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Siskiyou Hesperian	
3-88	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Siskiyou Hesperian	First paragraph, last sentence: "It may occur in...(Frest and Johannes 1996 1995 ...)."
3-91	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Management Indicator Species	First complete paragraph, second sentence: "Indicator species act....Forest Plan (1989 page IV-10 and 11, FEIS page III-102)."
3-101	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Alternative 1, Great Gray Owl	Second paragraph, first sentence: "Noise above ambient levels.... wood would likely remain very low..."
3-105	Section 3.4.1, Issue: Potential Effects on Forest Service Sensitive Species, Management Indicator Species, NWFP Survey and Manage Species, Migratory Birds, and Other Sensitive Terrestrial Species, Alternative 2, Great Gray Owl	First paragraph, fourth sentence: "Noise above ambient levels.... wood would likely remain very low..."
3-121	Section 3.4.2, Issue - Potential Effects on Soil Resources, Alternative 1, Direct and Indirect Effects	Second paragraph, third sentence: "Existing historic and unapproved trails currently directly impact about 6.1 acres 6.21 acres of soils within the analysis area (Table 3-40)."
3-134	Section 3.4.3, Issue - Potential Effects on Geologic Slope Stability, Comparison of Alternatives	Third bullet: "The proposed re-route of the Jabberwocky Trail under Alternatives 2 and 3 would avoid the most LHZ 1 and 2 slopes, reducing reduce the percent of trail length along LHZ 1 and 2 slopes to to areas to between 33% (Alternative 3) and 47% (Alternative 2), relative to (compared to 47% for Alternative 2 and)"

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		56% for Alternative 1)."
3-141	Section 3.4.5, Issue: Attainment of Aquatic Conservation Strategy Objectives,	ACS Objective 2 bullet, third sentence: "Twelve stream crossings would be decommissioned under Alternative 3, resulting in a net decrease of four stream crossings in the analysis area (see Table 3-11 Table 3-16)"
3-144	Section 3.4.6, Potential Effects on Aquatic Species and Habitats, Alternative 1, Coarse and Fine Sediment	Second paragraph, second sentence: "However, total annual sediment delivery....erosion predictor model (Appendix B), ranges..."
3-155	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi - Effects Mechanisms and Analytic Framework	First paragraph, first sentence: " As described in detail in Biological Evaluation (Rolle 2014) and Survey and Manage Report (Rolle 2013 completed in support of the proposed action... The effects analysis in this section EA is informed by field reconnaissance of the analysis area by the Forest Service botanist in the summers of 2011, 2012 and 2013 (Rolle 2013, 2014)."
3-155	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi - Effects Mechanisms and Analytic Framework	First paragraph, second sentence: "During those surveys, all the existing unapproved and historic trail alignments (excluding Lower Marty's and No Candies Trails)..."
3-158	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 2, Howell's Tauschia	Last paragraph, last sentence: " <i>It is not known if these</i> impacts could be greater, however, than those associated with Alternative 1 where the Split Rock Trail would not be reestablished, and recreational use would likely remain low <i>but not channeled into specific routes that minimize impacts to tauschia.</i> "
3-160	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 2, Gastroboletus Turbinatus	First paragraph, last sentence: " <i>Although unlikely, this potential</i> impact <i>to gastroboletus turbinatus under Alternative 2</i> would <i>could</i> be similar to <i>greater than</i> Alternative 1 <i>where no trail construction would occur.</i> "

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3-160	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 2, Monument Plant	First paragraph, last sentence: " This impact would be similar to Alternative 1. Although no effect on the local viability of this species is expected under Alternative 2, the loss of individuals during trail construction would be greater than under Alternative 1, where no trail construction would occur. "
3-161	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 3, Mt. Ashland Lupine	First paragraph, second sentence: "Impacts associated with the winter late spring / early summer use of the Upper Time Warp Trail when lingering snow banks are present would be minimized..."
3-161	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 3, Three-Toothed Horkelia	First paragraph: "The potential direct and indirect effects on three-toothed horkelia under Alternative three would be the same as those described for Alternative 2 be less than Alternative 2 because the Winburn Trap Trail would be decommissioned. PDC BOT-8 and BOT-9 would require that known populations of three-toothed horkelia along the Winburn Trap and Lower Marty's Trails be marked..."
3-161	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 3, Gastroboletus Turbinatus	First paragraph, last sentence: " This impact is comparable to Alternatives 1. Although unlikely, this potential impact to gastroboletus turbinatus under Alternative 3 would could be similar to greater than Alternative 1 where no trail construction would occur. "
3-162	3.4.9, Issue - Potential Effects on Federally-Listed, Forest Service Sensitive, NWFP Survey and Management Species, or Locally Rare Species of Vascular Plants, Bryophytes, Lichens, or Fungi, Alternative 3, Monument Plant	First paragraph, fourth sentence: "With implementation of this PDC, trail-related impacts to monument plants would not be anticipated and would be be minor and would not affect the local viability of this species. These impacts would be similar to those associated with Alternative 1.
6-6	6.3, Chapter 3-Affected Environment &	Frest T.J. and E.J. Johannes (1995 and 2000)

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	Environmental Consequences	
6-7	6.3, Chapter 3-Affected Environment & Environmental Consequences	Place carriage return between reference for Leonard et al. (1993) and Lofroth et al. (2010)
6-8	6.3, Chapter 3-Affected Environment & Environmental Consequences	Place carriage return between reference for Nice and VanBuskirk (1996) and North Coast Regional Water Quality Control Board (2010)
6-8	6.3, Chapter 3-Affected Environment & Environmental Consequences	Place carriage return between reference for Nussbaum et. al. (1983) and Olive and Marion (2009)
6-9	6.3, Chapter 3-Affected Environment & Environmental Consequences	Place carriage return between reference for Patton (1994) and Pilgrim and Schwartz (2013)
6-12	6.3, Chapter 3-Affected Environment & Environmental Consequences	Add the following reference, as cited on page 3-168 of the EA: <i>USDA Forest Service. 2004. Programmatic Agreement Among the United States Department of Agriculture Forest Service Pacific Northwest Region (Region 6), the Advisory Council on Historic Preservation, and the Oregon State Historical Preservation Officer Regarding Cultural Resources Management in the State of Oregon by the USDA Forest Service. June 4.</i>

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