ENVIRONMENTAL ASSESSMENT

JULY 1992

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MOTORIZED ACCESS AND TRAVEL MANAGEMENT

Heppner Ranger District

Morrow, Grant, and Wheeler Counties, Oregon

Responsible Agency
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Umatilla National Forest
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DECISION NOTICE
AND
FINDING OF NO SIGNIFICANT IMPACT

MOTORIZED ACCESS AND TRAVEL MANAGEMENT

Grant, Morrow, and Wheeler Counties, Oregon

USDA FOREST SERVICE
UMATILLA NATIONAL FOREST
HEPPNER RANGER DISTRICT

The Decision

An environmental assessment (EA) for Motorized Access and Travel Management has been prepared. It examines motorized travel options for the entire Heppner Ranger District of the Umatilla National Forest, in Grant, Morrow, and Wheeler Counties in the state of Oregon. The EA and maps are available for review at Forest Service offices in Pendleton and Heppner, Oregon.

Based on the analysis described in the EA, it is my decision to adopt and implement Alternative C with modifications. In this alternative, Heppner Ranger District identifies roads and trails (routes) to be opened or remain open, yearlong or seasonally, for public or administrative use. Roads not needed for recurring management or public access will be closed.

Alternative C allows for a wide variety of road standards that access a variety of landscapes and will provide the opportunity for a diverse motorized experience. It provides 525 miles of road open either yearlong or seasonally. The remaining 520 miles of currently identified system roads will be closed and approximately 35% of those will be obliterated.

Alternative C provides OHV and snowmobile opportunities (since conditions under which snowmobiles and OHVs are used are so different, they have been dealt with separately). While OHVs and snowmobiles will be restricted more than they are currently, this alternative still meets the needs of OHV and snowmobile users while addressing big game needs.

Because alternative C will create some designated OHV routes while closing some roads, there should be a minimal net change in non-motorized recreation opportunities from current levels.

While providing road oriented recreation, OHV, and snowmobile opportunities, alternative C will work toward increased quality of big game habitat as there will be less overland OHV use and less open roads than in the current situation.

This alternative allows for administrative use, but requires a permit system that will control administrative use.

As modified, alternative C will provide OHV and snowmobile opportunities as follows:

* In General Forest east of Road 22, OHV use will be restricted to designated routes yearlong. In General Forest west of Road 22, overland OHV use will be allowed yearlong in E1 management areas. In the Winter Range, OHV use will be restricted to designated routes yearlong. OHV use will be restricted to designated routes in the Summer Range yearlong.

* In the Winter Range, overland snowmobile use will be allowed except from ***December 1*** through April 15, when snowmobile use will be restricted to designated routes. Overland snowmobile use will be allowed in the Summer Range and General Forest.

* Any restrictions that ended on December 14 (as discussed in the EA) will end on November 30 instead. Any restrictions that began on December 15 (as described in the EA) will begin on ***December 1*** instead.

In arriving at the decision, I reviewed the purpose and need, key issues, other alternatives considered, and public input and comments, all of which follow. I also reviewed the environmental consequences of the alternatives displayed in the EA.

Purpose and Need

The purpose of this proposal is to progress toward the desired future conditions, goals, and objectives of the management areas located on the district. The resulting plan must:

- be fair and address public needs in its development.
- be understandable, implementable, and enforceable.
- be consistent district-wide and with the Access and Travel Management Program on the North Fork John Day Ranger District.

The original need for a Motorized Access and Travel Management Plan was identified during the development of the Umatilla National Forest Land and Resource Management Plan. The Record of Decision (ROD) for that document, pages 11, 20, and 21 states that a district Access and Travel Management Plan will be completed. Other needs identified include the following:

- need to reduce conflicts between recreational user groups while still providing a variety of recreation opportunities.
- need to reduce motorized vehicular disturbance to water, soil, vegetation, and wildlife resources.
- need to eliminate roads (and associated maintenance costs) that are not required for resource management.
- need to cooperate with adjacent private land owners in providing access to private lands.
- need to provide for commodity resources and administrative activities.
- need to provide for a wide range of recreational uses.

Key Issues

KEY ISSUE 1: ROAD ORIENTED RECREATION

Open roads provide opportunities for people limited to motorized access to enjoy Heppner Ranger District. They provide recreation opportunities such as viewing scenery, hunting, camping, and driving for pleasure. Some roads and associated areas are used traditionally and passed from generation to generation by recreationists. Native Americans need access and have been guaranteed certain rights through treaties and laws to use lands.

Reducing the miles of road available for motorized recreation could result in higher concentrations of road oriented recreationists in areas still available for their use, and this could result in a higher impact on other resources and a less enjoyable experience for recreationists.

KEY ISSUE 2: OHV AND SNOWMOBILE USE

Unrestricted use has provided OHV and snowmobile users with a wide range of recreation opportunities. However, as this type of use continues to increase, other resources may be impacted. These impacts may be difficult to locate with unrestricted use.

Restricting OHV and snowmobile use to designated routes would allow for monitoring impacts on other resources, but may eliminate access to areas for some users, limit the variety of challenging terrain, and cause a higher impact on routes still available. Designated routes would direct use away from sensitive areas, reduce disturbance to wildlife, and allow recreationists who prefer a non-motorized experience to avoid disturbance from these activities.

KEY ISSUE 3: NON-MOTORIZED RECREATION

Open roads and unrestricted OHV and snowmobile use can decrease or eliminate solitude, reduce enjoyment, and can result in a lower quality experience for non-motorized recreationists. However, closing roads and restricting OHV and snowmobile use could reduce access for non-motorized recreationists.

KEY ISSUE 4: BIG GAME

High open road densities and unrestricted OHV and snowmobile use disturb big game which can be harmful during critical periods in their life cycle. Disturbance may also cause big game to move on to private land.

Closing roads and managing OHV and snowmobile use would reduce disturbance and vulnerability of big game.

KEY ISSUE 5: ADMINISTRATIVE USE

Open roads and OHV and snowmobile use provide easy access to conduct resource management activities including timber harvest, tree planting, grazing, mining, firewood gathering and many more. Access is also required for fire suppression, search and rescue, medical emergencies, and law enforcement. Closing roads to administrative use and restricting use of OHVs and snowmobiles will increase the costs of resource management, and make access more timely and difficult for these uses.

Other Alternatives Considered

ALTERNATIVE A (NO ACTION) - Management of the road system would continue to develop on a project by project basis. Consistency in road closures across the district and with North Fork John Day Ranger District might not occur. It would provide 689 miles of yearlong or seasonally open road. While allowing the most freedom across the district for snowmobiles and OHVs, this alternative would limit opportunities for and the quality of non-motorized recreation. Monitoring and controlling effects from OHV use would be difficult as those impacts would be scattered. Poor big game habitat would be the result of high open road densities and unrestricted OHV and snowmobile uses. Administrative use would be allowed district-wide with some seasonal restrictions in the Texas and Wickiup Cooperative Travel Management Areas.

ALTERNATIVE B - would move the district toward Forest Plan desired future conditions, but only minimally with respect to big game. Road closures would be consistent across the district, but may not be consistent with North Fork John Day Ranger District. This alternative would provide 860 miles of yearlong or seasonally open road, the most of any of the alternatives; road oriented recreation would be maximized. Some restrictions would be placed upon OHV and snowmobiles, but with the very high number of open road miles, the result would be reduced non-motorized recreation opportunities and poor big game habitat quality. This alternative would allow the most unrestricted administrative access.

ALTERNATIVE D - would move the district toward Forest Plan toward an interpretation of desired future conditions that strongly emphasizes big game and non-motorized recreation. Road closures would be consistent across the district, but may not be consistent with North Fork John Day Ranger District. Providing only 297 miles of yearlong or seasonally open road, road-oriented opportunities would be very limited. It provides the least opportunities for OHVs and snowmobiles, resulting in maximized non-motorized recreation opportunities and big game habitat quality.

Rationale for the Decision and Modifications

I have decided to adopt and implement alternative C (with modifications) because it provides the best mix of responses to and resolution of all key issues and because it best addresses the goals and objectives of this project. The alternative as modified best incorporates ideas, opinions, and concepts suggested by the public.

By providing an estimated 525 miles of open road either yearlong or seasonally, and by creating designated OHV routes, alternative C adequately provides for a variety of motorized dispersed recreation opportunities for all types of users on the District. At the same time, non-motorized recreational opportunities are also provided, slightly above current levels. Planned road closures will help to provide some additional trail opportunities.

OHV and snowmobile use will be more restricted than they are currently. However, the Plan should meet the needs of OHV and snowmobile recreationists while addressing big game and other resource needs. An increase in designated routes is planned and some overland use is provided.

In choosing alternative C, I find that planned road closures, including seasonal closures, have the potential to increase big game habitat quality. With the loss of cover due to declining forest health, reduced open road densities is very important; additional road closures have the potential to reduce big game disturbance and vulnerability. The road closure and obliteration components of the program should also help to provide additional protection to water, riparian, and fishery resources.

My decision provides for the access for continued resource use described in the Forest Plan. The access and travel plan has the flexibility for future adjustments as conditions and needs change. The plan also provides needed access to private lands. Sufficient motorized access for the Forest Service to carry out the range of

its protection and management responsibilities is provided. The access permit system provides adequate administrative controls to help protect resources, including big game, while allowing the agency to complete its work.

I have modified alternative C for the following reasons:

Restricting OHVs to designated routes east of Road 22 makes this plan much more understandable, implementable, and enforceable. Unmodified, alternative C allowed overland OHV use in the General Forest seasonally district-wide. The boundaries between General Forest and Winter Range and Summer Range are ambiguous and would have to be posted on the ground. Most of the district west of Road 22 (Sunflower Flat county road) is General Forest, and the problem of defining the boundary and managing different OHV uses between General Forest and Winter Range is somewhat less than east of Road 22. However, east of Road 22, General Forest becomes a narrow band, and managing overland use in an area surrounded by areas where OHV use is restricted to designated routes would be very difficult to implement, understand, or enforce.

Restricting OHVs to designated routes east of Road 22 also makes this plan more consistent with Access and Travel Management on the North Fork John Day Ranger District.

Changing the December 15 date to December 1 makes this plan consistent with the Umatilla National Forest Land and Resource Management Plan, and with Access and Travel Management on the North Fork John Day Ranger District. A winter range plan for the Monument Winter Range in coordination with the Oregon Department of Fish and Wildlife is expected to be developed by 1993. A review of appropriate use/protection dates will be completed through this plan. A Forest Plan amendment would have to be prepared if this date is changed.

It is recognized that additional designated OHV routes are needed to meet the needs of OHV users. This EA will remain flexible to identify and add those routes as well as any other necessary changes revealed by site specific analysis. Any designated OHV or snowmobile routes that cross private land would require an agreement with that private land owner prior to being implemented. Continued public input with regard to identifying designated OHV and snowmobile routes is strongly encouraged, and will be solicited as this plan is implemented.

It is my determination that the analysis is still valid and this modification will reduce confusion when this plan is implemented.

The project lies within lands ceded to the United States by treaties with American Indian tribes. These treaties established trust responsibilities for the United States that were intended to protect reserved rights and interests of the tribes. During project scoping and alternative analysis, protection responsibilities were addressed and are reflected in alternative C.

In my review of this project, along with the entire forest health situation, it is clear to me that clean water and productive soils are the foundation for forest health. This project will accomplish some of the work necessary to move toward desired future conditions established in the Forest Plan.

Lastly, I have decided to select alternative C because I believe it has the highest degree of public acceptance and support of all of the alternatives. The public involvement process used by the district helped to develop and build public understanding and support. The foundation of alternative C, and my decision, rests on this active public participation, discussion, and recommendations.

Public Involvement

The public has been heavily involved throughout the development of this EA. Hunter surveys were conducted during the hunting seasons of 1989 through 1991. Two town meetings were held in Heppner in January 1991 during which local citizens were chosen by the public to represent different interests. Over the following 14 months, that group (called the Public Working Group) met with the Forest Service 23 times, giving input to what later became alternative C. Another town meeting was held in March of 1992, followed by another Public Working Group meeting in July of 1992. Other public involvement was accomplished through newsletters in the East Oregonian and the Heppner Gazette and through two open houses held by Heppner Ranger District in 1991 and 1992.

Comments and Responses

A working copy of the EA was made available for public review and comment from May 15 to June 15, 1992. A summary of comments from individuals and organizations follows, with my responses. To keep the discussion concise and readable as possible, comments have been summarized and similar ones consolidated.

1. **The district obviously did not take a "hard look" at the impacts of any of the alternatives on water quality, fish or riparian habitat. These characteristics are severely impacted by roads in a way that is not addressed at all. These impacts are related to removal of riparian vegetation and continued prevention of vegetative growth which leads to increased temperature and lack of large woody debris which provides important physical structure to fish habitat. In addition, sediment from poorly maintained and poorly located roads, crossings, and ditch drains is negatively impacting spawning and rearing habitat. In summary, water quality needs to be identified as a key issue. All roads contribute to stream sedimentation and even closed roads prevent riparian vegetation from growing as well as maiming hydrologic functioning of the watersheds.**

   The Access and Travel Management EA is a *programmatic* EA, similar to the Forest Plan EIS. While water quality was not dealt with as a key issue, it was dealt with under other issues; the problems that roads can cause with watershed are recognized. However, this EA has provided the analysis required to establish the overall open/closed status of roads district-wide.

   Roads that are causing watershed and fish habitat problems *are* a high priority for closure, obliteration, or other mitigation. Every road has been assigned an open, seasonal, or closed status and watershed concerns helped determine that status. When site specific analysis indicates that a road should be closed due to watershed, water quality, fish habitat, sedimentation, or other resource problems, that road's status can be changed, if needed, to mitigate the resource problem. This document has provided the framework through which that mitigation can be accomplished.

   This decision provides for less open roads than there are at present. That reduction will help improve the watershed resource. Unneeded roads in riparian areas will be obliterated, which also assists in improving water resources.

2. **Administrative use is outside the definition of "closed roads."**

   The Access and Travel Management EA document establishes a framework for managing the road and trail system. A permit will be required before administrative use will be allowed on any closed road. This analysis has identified conditions under which those permits will be issued. This EA has also set up a system of monitoring and evaluation to determine if administrative use is causing resource damage.

Through monitoring and evaluation, a determination will be made as to whether more stringent access control for administrative use is necessary to attain desired future conditions of forest ecosystems.

3. **The basic premise for this document appears to be that "motorized vehicles disturb wildlife" therefore motorized vehicles need to be restricted. These restrictions are not based on facts nor have the impacts of these restrictions been adequately addressed. Numerous studies show that people on foot disturb wildlife more than people in vehicles. To reduce disturbance, why not limit the number of hunters rather than limit access by all the other dispersed user groups?**

   The Forest Plan direction is to manage big game habitat such that ODF&W can achieve state herd management objectives [Forest Plan page 4-158]. The Forest Plan includes a review of the issue of roads and effects on wildlife. Limiting hunters is outside the authority of the Forest Service. State management objectives contain population parameters other than total population. The parameter that currently does not meet management objectives is bull escapement numbers. A secondary concern is related to calf survival. Both bull escapement and calf survival have been linked in numerous scientific studies to human related disturbance, (this is documented in the analysis file for this EA).

   While it is recognized that people on foot or horseback do create some level of disturbance to wildlife, use of motorized vehicles greatly expands the amount of habitat available to this kind of disturbance in any given user day. The use of motorized vehicles greatly increases both level of interaction between people and wildlife and effects the amount of habitat where that interaction occurs.

4. **It is apparent that the management of the resources are not balanced and that recreation, and especially dispersed recreation, is not a high priority on your district but that big game management definitely is a high priority. The adverse impacts this plan will cause to dispersed recreationists, and especially motorized dispersed recreationists, have not been adequately addressed.**

   Road oriented recreation and non-motorized recreation were addressed in the Motorized Access and Travel Management planning process. These issues both address motorized and non-motorized dispersed recreation and changes in dispersed recreation opportunities were evaluated. In the preferred alternative, the changes are not great although it is true that road closures are likely to displace some motorized recreationists. The chosen alternative provides for a balance and variety of settings and experience opportunities for both motorized users and the "adverse impacts" referred to are minimized.

5. **The road closures and restrictions proposed here will only concentrate people and reduce the quality of their recreation experience. The draft EA states that "most local roads will be closed." What about the needs of the dispersed recreationists? How many people want to camp within 300 feet of a main road? Are there even enough suitable campsites? Closure of historical hunter campsites such as the Pole Creek Ridge can only create ill will with the general public.**

   Although some recreationists may be displaced, the proposed level of road closures will maintain areas for dispersed recreation opportunities. A majority of the more heavily used roads and dispersed campsites will remain open to vehicular traffic. Some areas will no longer be available for motorized use, but they are still available for camping, hiking, backpacking, or horse riding. This in effect may help distribute use in a fashion that competition for roadside campsites will not be significant. Monitoring will help us evaluate the need to change road designations in the future.

6. **The 2-month closure in summer range for fawning and calving will be extremely difficult and expensive to post and enforce.**

Heppner Ranger District is currently administering a similar closure in this area at a different time of year in cooperation with the Oregon Department of Fish and Wildlife without significant difficulty. Posting the closure will be relatively simple as a sign explaining the closure will be posted on seasonal and closed roads. Since OHVs are restricted to designated routes yearlong, and for the most part overland use in the Summer Range is impractical, enforcing the closure should be relatively simple.

7. **There is far more noise and dust created by a single logging truck going down the road than all ATVs and snowmobiles put together.**

Logging activities are constrained by contract language that is specific to resource damage. Furthermore, the duration and locality of logging activities is finite; single areas are logged for a short period of time and then left alone for years. Log trucks are required to stay on main roads except in accessing the units. Timber sale purchasers are required to perform prehaul maintenance and dust abatement on haul roads. There are no such requirements made of nor controls placed on OHVs.

8. **Don't you think the risk of OHVs spreading noxious weed seeds is stretching the imagination a little bit?**

This concern was raised by the Morrow County Noxious Weed Control District during issue development. Motorized vehicles have been known to spread noxious weeds. Documents describing studies are placed in the analysis file and are available for review at the Heppner Ranger District Office.

9. **A definition/explanation of what a noxious weed is would be appropriate.**

Noxious Weed is defined in the glossary in the final EA.

10. **User conflict between snowmobiles and cross-country skiers- do you have any documented instances? The fact is that since there are no groomed trails in this area, the skiers prefer to use packed snowmobile paths. It's also a fact that the majority of user conflict is caused by poor trail system design and management, not the users.**

There are no documented instances of this conflict on Heppner Ranger District. At current levels of cross-country skiing on the district, the risk is low, but potential for this conflict does exist. Should cross-country use increase (some increase is expected as it is encouraged), the risk could become greater. Management of these user groups will play a major role in resolving conflicts between these user groups. As this is a programmatic EA, it will provide the framework for that management.

11. **There are many statements made in EA that didn't come out of the Public Working Group. Alternative C in EA did not follow the Public Working Group guidelines.**

The Public Working Group was assembled to provide their thoughts and comment on the district's motorized access and travel management plan. The input the group provided helped to build the foundation for alternative C. The IDT evaluated public comment, resource needs and requirements, agency direction and other factors to construct the alternatives for consideration by Forest decision makers. Ultimately, the responsibility for listening to public input, resolving conflicts in public advice

and input, and making the final decision rests with the Forest decision makers. In this case, the District Ranger recommends and Forest Supervisor decides on the appropriate management plan.

12. **The restriction to snowmobiling from 10/15 to 12/14 is not valid or justified. The issue here is that we need to take advantage of the snow when we have the snow.**

This plan, as modified under "The Decision", will restrict snowmobiles to designated routes only in the Winter Range. The Forest Plan is clear on this restriction to protect big game. Otherwise, overland snowmobile use is allowed across the district.

13. **Monitoring users needs and experiences should be included.**

I agree and monitoring is planned. Data is gathered throughout the year by district employees in the way of conversation with visitors, questionnaires, campground receipts and host interviews, and open houses sponsored by the Forest Service. During implementation of the Access and Travel Management plan, monitoring and evaluation including public comment gathering, will provide input for future recreation planning and concerns.

14. **Closures should not be based on opinions from those who only use the area a limited amount of time. A survey should be taken year around, so people who use the National Forest in spring, summer and wintertime would be able to have some input, not just the elk hunter who is here for one week a year.**

The National Forests are managed for all citizens; the Forest Service solicits input from all forest users. Hunter surveys were done during hunting season in order to obtain input from those users, regardless of whether they were year-round users or not. It is recognized that a significant portion of the input received from that survey may have come from forest users who do not live in the immediate area around the district. However, most of the public input received through town meetings, open houses, and Public Working Group meetings was from forest users who do live in the immediate area around the district.

15. **A road off of 2105121 that goes south on a ridge between Gilbert and Potamus Creeks should be open to its end (in section 16). It is not shown on the map. Another road that runs north and south between roads 2103 and 2105 (in sections 25 and 36) east of Little Potamus Creek and west of Elkhorn Spring should be open over its entire length. It too is not shown on the map. Road 2104 should be open to the forest boundary so the forest can be exited down Mallory on a year-round basis.**

These changes have been made and will show on the map in the final EA.

16. **Our basic road needs are for access to our property and water supply for the Davis cabins which are used heavily from May thru December by the family.**

Access to this private land has been allowed for and will show on the map in the final EA.

17. **Seniors/Disabled: They have been eliminated from much of the district through road closures.**

Access for seniors and disabled is still available to all portions (Summer Range, General Forest, Winter Range) of the district. Approximately 525 miles of road are still available throughout the district to provide a variety of recreational activities such as hunting, fishing, gathering forest products, viewing scenery, camping, hiking, and others.

18. **The USFS/ODF&W closed roads using the security areas which are not a part of the Forest Plan.**

During the 3-year planning period of this EA, major catastrophic insect and disease damage and mortality were underway in forest ecosystems. These events have made some course corrections necessary throughout the planning process. Big game security areas are one of the concepts developed to mitigate for the loss of big game habitat, primarily the loss of cover. These areas were tentatively identified with ODF&W as short-term mitigation, as recovery of the forest occurs. In dealing with the forest health issues, the Forest has been working on potential amendments to the Forest Plan. This process is confirming the need, amount, and location of big game security areas.

Although the tentative big game security areas were considered in the Access and Travel Management planning process, the plan (alternative C) is not dependent on the areas. In considering big game security areas, only a few additional miles of road were closed with the purpose of supporting big game on the district.

19. **The best resource protection is achieved through a designated (OHV) trail system as opposed to open areas or sacrifice areas. The recreational experience does not suffer if the design of the system provides for all skill levels. If the trail is designed properly you can also greatly reduce any real or perceived conflicts with other users and wildlife as well as future enforcement problems.**

This plan, as modified under "The Decision", will allow overland OHV use only west of Road 22 (Sunflower Flat Road). That overland use is further restricted to E1 management areas. This complies with the Forest Plan [page 4-178].

As stated in "Rationale For the Decision", participation in designating these trails is welcome and encouraged.

20. **Roads considered for closure to regular vehicles should be considered as possible trails for OHV users if they are not going to be obliterated. This would allow for some monitoring of weed invasions as well as aid in the prevention of possible new invasions. Open use of the general forest by OHV's does not appear to be logical consideration given the potential for damage.**

This plan, as modified under "The Decision", will only allow overland OHV use west of Road 22 (Sunflower Flat Road). That overland use is further restricted to E1 management areas outside of security areas. This complies with the Forest Plan [page 4-178].

Monitoring of designated OHV routes will reveal any noxious weed invasion or spread. In some cases, old roads closed to regular vehicles may be designated as OHV routes. Before any road is closed or obliterated, a survey for noxious weeds will be done, and noxious weeds removed.

21. **The EA does not address the commodity outputs expected by the various alternatives. This issue is referred to but the effects on local communities by various alternatives is not clear. With the current forest health issue facing all land managers in the Blue Mountains, I would urge you select whatever alternative will allow you the maximum flexibility in salvaging the effected timber stands.**

This selected alternative is consistent with the Forest Plan which addressed the commodity outputs concerns. Commodity management was dealt with under administrative use; access for commercial use is provided for. This EA does not preclude using closed roads for commodity management. It does, however, impose seasonal restrictions in some areas. Alternative C provides sufficient long-term flexibility for continued resource use and, through monitoring and evaluation, can be adjusted as needs arise.

22. **A related issue that should be foremost in your considerations when selecting your preferred alternative, is the need for rapid initial attack on wildfire. Closing additional roads on the district will restrict your ability to access some areas of the district, thereby enabling these fires to increase in size and coupled with the current fuel loading on the district the results could be catastrophic. Road closures should be accomplished with gates, removable devices, or signing rather than an earthen barricade or obliteration.**

Fire suppression was considered throughout the planning process for this EA. Emergencies such as wildfire suppression are not restricted by this plan. It is recognized that effects of this plan such as closure devices installed or roads obliterated could have effects on initial attack on wildfire. Roads to be obliterated will first be determined unneccessary for resource management and administrative use, including wildfire suppression. While it is recognized that earthen barricades would hinder initial attack, they can be made passable relatively quickly, and this ability needs to be balanced against the higher installation and maintenance costs of gates and guardrail barricades. Considering this and the amount of yearlong and seasonally open roads, access for fire suppression should remain at or near current levels.

23. **Security areas contain a tremendous amount of dead and dying timber and have the potential of someday burning and spreading to adjacent private land. Access and salvage (of dead and dying timber) in security areas are extremely important to protect investments made on neighboring private land.**

Security areas are a possible mitigation for the loss of quality big game habitat. The Forest is still evaluating the need for the security areas. Effects of implementing security areas will be analyzed in the process underway to amend the forest plan.

Roads in proposed security areas will be closed to the public and restricted to administrative use. We would be closing roads with or without security areas in order to lessen harassment and impacts to big game. This is particularly needed with the current forest health situation. The closures will not apply to wildfire suppression (see response to the previous comment).

Finding of No Significant Impact (FONSI)

I have determined (based on public scoping, the analysis and evaluation contained in the project file, and past experience) that this is not a major Federal action and will have no adverse environmental effects over those addressed in the Forest Plan FEIS and the Managing Competing and Unwanted Vegetation FEIS and its Mediated Agreement. This action will have limited context and intensity [40 CFR 1508.27], individually or

cumulatively, to the biological, physical, social, or economic components of the human environment. It will have little or no adverse effect on: public health or safety, consumers, civil rights, minority groups and women; prime farmland, rangeland, and forestland; wetlands and floodplains; significant scientific, cultural or historical resources; roadless areas; dedicated or inventoried old-growth forest; ecologically critical areas; threatened, endangered or sensitive species (or their habitat). Biological evaluations are on file at the district office. The action does not pose a violation of Federal, State, or local law or requirements imposed for the protection of the environment. Therefore, I find that an environmental impact statement is unnecessary.

Requests for Review and Implementation

Implementation of this project will not occur before July 27, 1992.

This decision is subject to appeal pursuant to 36 CFR 217. Any written Notice of Appeal of this decision must be fully consistent with 36 CFR 217.9 (Content of a Notice of Appeal) and must include the reasons for appeal. The Notice of Appeal must be filed in duplicate with the Reviewing Officer, JOHN LOWE, Regional Forester, PO Box 3623, Portland, OR 97208, within 45 days of the date of the legal notice in the East Oregonian newspaper.

For further information contact Delanne Ferguson or Don Finley, P.O. Box 7, Heppner, OR 97836, Telephone (503) 676-9187.

Jeff D. Blackwood, Forest Supervisor

7/20/92
Date