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Forest Service

Beaverhead-Deerlodge
National Forest

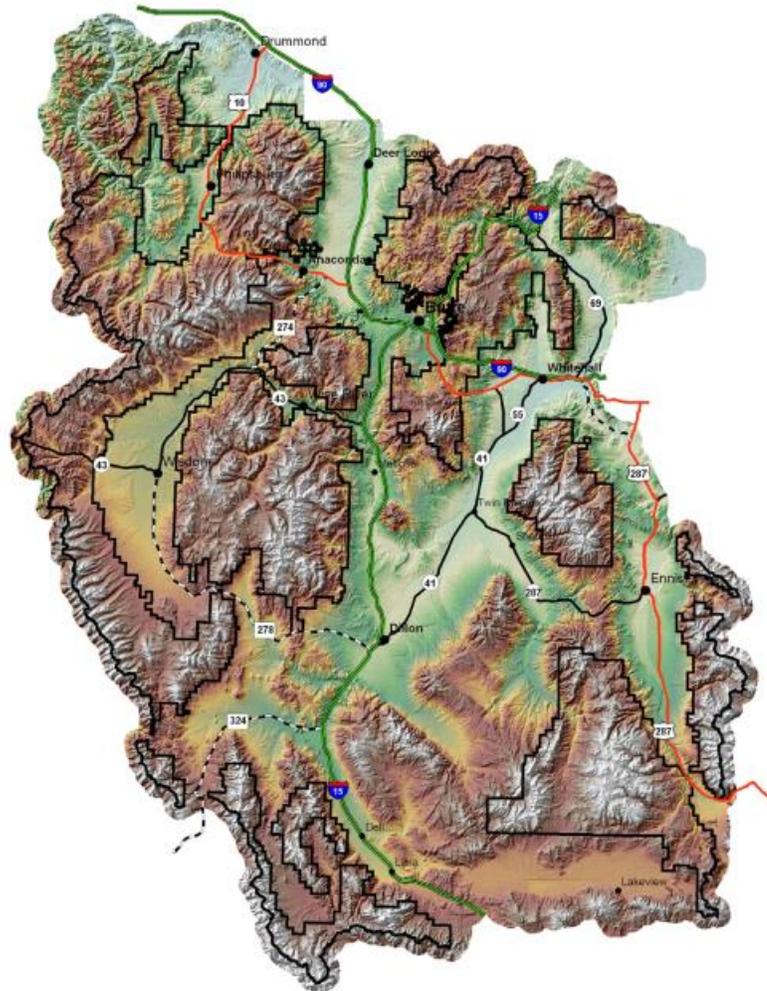
September 2014



Beaverhead-Deerlodge National Forest Land and Resource Management Plan

Explanation Supporting Not Including Temporary Roads in Open Motorized Road and Trail Densities

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



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Beaverhead-Deerlodge National Forest Land and Resource Management Plan

Explanation of Prior Decision

To Comply With a District of Montana Court Order (Temporary Roads)

Counties	Beaverhead, Deer Lodge, Gallatin, Granite, Jefferson, Madison, Powell and Silver Bow, Montana
Lead Agency	USDA Forest Service, Beaverhead-Deerlodge National Forest
Responsible Official	Melany Glossa Forest Supervisor 420 Barrett Street Dillon, MT 59725
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Background

In an order dated May 24, 2013, the U.S. District Court for the District of Montana found the Forest Service "...complied with the general requirements of the 1982 viability regulation for elk and adequately disclosed the science upon which it relied to determine appropriate road density levels for areas with different management goals." However, the court also found "...the Forest Service did not explain or support its decision to exclude temporary roads from the road density objectives". The court directed the Forest Service to "...supplement its EIS for the Forest Plan to explain or support, if possible, its decision to exclude temporary roads from the road density objectives..." (Court Order, pg. 4).

The Beaverhead-Deerlodge National Forest (BDNF) prepared a Draft Supplemental Environmental Impact Statement (DSEIS) and a Final Supplemental Environmental Impact Statement (FSEIS) to the 2009 Revised Forest Plan Corrected FEIS to respond to the court order explaining its decision to exclude temporary roads from Open Motorized Road and Trail Density (OMRTD) goals. The DSEIS was available to interested members of the public and comments were accepted for 90 days following the March 14, 2014 publication of a Notice of Availability in the Federal Register, pursuant to 36 CFR 219.16(a)(2). A legal notice for the DSEIS comment period was also published in the Montana Standard on March 14, 2014. The BDNF received correspondence from 12 individuals, organizations, and other agencies in response to the DSEIS. An agency response to each comment is disclosed in Appendix A of the Final SEIS (FSEIS).

2009 Forest Plan

In a Record of Decision (ROD) dated January 14, 2009, then Regional Forester Thomas Tidwell approved the 2009 Forest Plan for the BDNF. The Forest Plan provides management direction for activities on the BDNF for the next 10-15 years including direction on eight revision topics (vegetation, wildlife, aquatic resources, recreation and travel management, fire management, livestock grazing, timber and recommended wilderness). This direction replaced previous management direction in the 1986 Beaverhead National Forest Plan and the 1987 Deerlodge National Forest Plan.

The 504 page Forest Plan provides management direction for activities on the 3.38 million acre BDNF and prescribes forest-wide management goals, objectives and standards for 17 specific resources and additional direction specific to 86 management areas. The Forest Plan wildlife security goal established OMRTDs for 11 separate landscapes varying from 0.0 to 2.0 miles/square mile. The wildlife security goal is associated with an objective to reduce OMRTDs in the Boulder River and Jefferson River Landscapes. In addition, the Forest Plan elk security goal established fall (October 15-December 1) OMRTDs for 29 hunting units varying from 0.0 to 1.8 miles/square mile. This goal is associated with an objective to reduce OMRTDs from October 15 to December 2 in hunting units 215, 300, 302, 318, 333, 341 and 350. Forest Plan Wildlife Habitat Standards 1 and 2 prohibit a net increase in designated open motorized road and trail mileage in landscapes and hunting units exceeding OMRTD objectives (Forest Plan, pgs. 45-48).

Site specific project analysis (subsequent to the 2009 approval of the Forest Plan) of wildlife-related goals, objectives and standards called into question the method for calculating Forest Plan OMRTDs related to the construction and use of temporary roads. The Court Order, stemming from a 2012 complaint, directed the Forest Service to explain or support its decision to exclude temporary roads from OMRTDs.

As requested by the Court, this document and supporting FSEIS explains and supports the prior decision to exclude temporary roads from OMRTD goals and objectives in the Forest Plan.

Explanation of Prior Decision

I have reviewed the FSEIS prepared for the Beaverhead-Deerlodge National Forest Land and Resource Management Plan to Comply with the District of Montana Court Order (Temporary Roads). I have also reviewed the 2009 Corrected Final EIS and Record of Decision. The Forest Plan provides for wildlife and elk security on the BDNF through wildlife habitat goals, objectives and standards prescribing desired OMRTD by landscape and hunting unit.

I considered the effects of not including temporary roads (primarily constructed for resource extraction) in OMRTD goals on Forest Plan EIS issues (aquatic resource management, fire management, recreation and travel management, suitable rangeland, suitable timberland, vegetation management, wilderness recommendations and wildlife management). Temporary roads constructed for resource extraction are not included in Forest Plan OMRTD goals and objectives because these roads are closed to public motorized use during project implementation and obliterated after project completion. It is appropriate to calculate OMRTD post-project.

Consideration of the SEIS and Public Comment

My explanation supporting why temporary roads are not included in Forest Plan OMRTDs considers both the SEIS analysis and public comments.

I considered the information disclosed in the FSEIS on the eight key issues in the Forest Plan Corrected SEIS. The results of the FSEIS analysis are briefly summarized here. Please refer to the FSEIS for further details.

Aquatic Resource Management: OMRTD goals and objectives do not influence the number of restoration and fish conservation key watershed prioritized for watershed restoration in the Forest Plan.

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

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

Suitable Rangeland: OMRTD goals and objectives do not influence the acres of the BDNF suitable for livestock grazing.

Suitable Timberland: OMRTD goals and objectives do not influence the acres of the BDNF suitable for timber production or the acres of forested lands where timber harvest to accomplish resource objectives is allowed. However, temporary roads are necessary to achieve the Forest Plan Objectives for managing suitable timber lands on the BDNF.

Vegetation Management: OMRTD goals and objectives do not influence goals, objects and standards for vegetation designed to maintain or restore the integrity, resiliency and sustainability of ecosystems. However, temporary roads are necessary to achieve Forest Plan objectives for smaller size class and early seral stage Douglas-fir and lodgepole pine on the BDNF. These objectives provide the basis for maintaining or restoring ecological communities of sufficient resiliency to provide for the viability of wildlife species that occur or make use of forested types on the BDNF.

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

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

The following items heavily influenced my explanation in support of excluding temporary roads in OMRTD calculation:

- Closed (often using a gate) roads used for permitted and/or administrative purposes are included in OMRTD calculations. Permanent roads closed to public motorized use but temporarily used for site-specific project activities like log hauling or mineral exploration and closed (rather than obliterated) at project completion are appropriately included in OMRTD calculations while the road is in use. (FSEIS, pg. 22 and Appendix A, pg. A-25).
- Since 2009, 338 miles of previously open motorized roads and trails on the BDNF have been closed to that use (FSEIS, pg. 11).
- USFWS determined the Revised Forest Plan, with its incorporated objectives, goals and standards, adequately reduces the potential for and minimized the effect of any incidental take that may result. Therefore, no reasonable and prudent measures are necessary for grizzly bear (FSEIS, pg. 19).
- The USFWS determined temporary roads have different effects on grizzly bears than those associated with permanent roads (FSEIS, pg. 19).
- Projects including any temporary road construction necessary for implementation require consultation with USFWS for Threatened and Endangered species.
- Temporary roads often remain on the ground for only one season (FSEIS, pg. 21 and Appendix A, pg. A-25 & A-26).
- The specific effects of temporary roads depend on such things as location, length, frequency and intensity of use and duration best addressed at the site specific project level for not only grizzly bears but other large carnivores and ungulates as well (FSEIS, pg. 20).
- Wildlife may be displaced during the construction and use of temporary roads during the time period the temporary road is being used for motorized access. This displacement is influenced by a number of factors, including the length of road, proximity of the road to a secure area, time of year the road is being used, length of time the road is in use, terrain and vegetation. Site specific analysis and design of individual projects is the appropriate planning level to avoid or mitigate the effects of temporary road construction and use (FSEIS, pg. 21-22).
- The Forest Plan allocates 284,000 acres of the 3.38 million acre BDNF to suitable timber. Since 2009, the BDNF has averaged 1,140 acres of timber harvest and constructed and obliterated only 5.38 miles of temporary road (FSEIS, pg. 23). The BDNF estimates approximately 70 miles of temporary roads may be constructed across the 3.3 million acre Forest in 15 years.
- At the landscape scale, 52% of the BDNF provides summer secure habitat and secure habitat increases to 59% of the BDNF during the general big-game hunting season (FSEIS, pg. 21).
- An additional 1,400 miles (23%) of motorized forest roads and trails are closed to motorized use during big game hunting season (October 15-December 1), which would, by default, include any temporary roads branching off those forest roads (FSEIS, pg. 21).

- Secure areas are distributed across all BDNF landscapes and range from 10 to 220,848 acre contiguous blocks with an average size of 3,022 acres. During the general hunting season, secure areas range from 10 to 308,267 acre contiguous blocks with an average size of 4,083 acres (FSEIS, pg. 21).

The following information compiled for this FSEIS, validates the goals, objectives, and standards in the 2009 Forest Plan:

- Since 2009, 5.38 miles of temporary roads for resource extraction have been constructed on the BDNF. All 5.38 miles were not open to public motorized using during project implementation and have been obliterated (FSEIS, pg. 4).
- Scientific literature published since 2009 recognizes numerous factors influencing elk use of available habitat and emphasizes the importance of managing motorized roads. The Forest Plan takes this emphasis one step further by including motorized trails (FSEIS, pg. 21). Managing motorized access through OMRTDs is a valid metric for maintaining viable elk populations on the BDNF (FSEIS, Appendix B, pg. B-8).
- Elk population monitoring identifies an abundant elk population in the region of the State receiving the greatest hunting pressure for elk further indicating the availability and use of quality elk habitat, availability of recreational hunting opportunities and support of Montana's fair chase emphasis as desired by Forest Plan goals (FSEIS, pg. 21 and Appendix B, pg. B-4 through B-8).
- MFWP Elk Plan Objectives desire a population of 30,575 elk in hunting units fully or partially located on the BDNF. Since 2009, total elk populations have exceeded MFWP objectives. In 2013, MFWP estimated 33,884 elk on, or near, the BDNF (FSEIS, Appendix B, Table B-1).

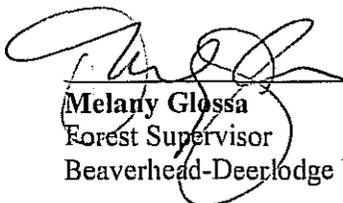
Conclusion

This document explains and supports the BDNF's decision to exclude temporary roads, primarily constructed for resource extraction, from Open Motorized Road and Trail Density calculations. For the previously described reasons, changes to management direction contained in the 2009 Forest Plan are not warranted at this time.

To reduce confusion about temporary roads and OMRTD calculations that currently exist, I will administratively add the following definition to the Forest Plan glossary:

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

This definition eliminates confusion about calculating the figure and allows a conservative approach to wildlife habitat management because it includes motorized trails (in addition to motorized roads) and includes motorized roads and trails located on private inholdings (FSEIS pg. 22).


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12 Sept 14
Date