

# Chapter 2: Public Participation, Issues and Alternatives

## 2.1 OVERVIEW OF CHANGES FROM DRAFT TO FINAL EIS

- The Alternatives Considered But Dropped From Detailed Analysis section was expanded to include additional alternatives identified in comments on the DEIS.
- Alternative B Modified was added in response to public comments.
- The Public Participation Summary was updated with information on public involvement for the DEIS.
- The discussion on route maintenance was moved from Chapter 1 to Chapter 2 and expanded.
- Mileage and effects tables were updated with information on Alternative B Modified.

## 2.2 INTRODUCTION

This chapter reviews the public involvement process, identifies issues, and describes and compares three alternatives considered for management of motorized and non-motorized travel. A summary of effects by alternative is also displayed at the end of this chapter.

## 2.3 PUBLIC PARTICIPATION SUMMARY

Ashland Ranger District Travel Management EIS public participation is summarized in this section. The summary describes public involvement, identifies persons and organizations contacted during preparation of the EIS, and specifies time frames for accomplishing goals in accordance with 40 CFR 1506.6

Public involvement includes the steps necessary to identify and address public concerns and needs. The public involvement process assists agencies in: (1) broadening the information base for decision making; (2) informing the public about the Proposed Action and the potential impacts that could result from the project; and (3) ensuring that public needs are understood by the agencies.

Public participation is required by NEPA at three specific points: the scoping period, review of the Draft EIS, and receipt of the Record of Decision. In addition, the 2005 Motorized Travel Rule specifies that there must be public involvement in the process of designating motorized roads and trails.

Table 2-1 lists the public meetings conducted in conjunction with the process to date.

### 2.3.1 PUBLIC SCOPING

Scoping is a process used to help identify specific areas of concern related to the proposal during the early portion of the detailed environmental analysis. The initial scoping document (see Project Record) for this project was distributed on November 26, 2007 to approximately 237 individuals, government agencies, tribal governments, news media, businesses, and organizations that have shown interest in projects on the Custer National Forest, and in particular on the Ashland Ranger District. The scoping document was also posted on the Forest's web page. The scoping document provided

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information on the purpose and need for the project, described the proposed action, and asked for comments. A news release inviting comments was placed in the Billings Gazette (Billings, MT) on November 27, 2007. News releases were also sent to local newspapers including the Miles City Star, Independent Press, Powder River Examiner, Outlook, and Yellowstone County News. These media efforts helped to publicize the proposal and comment period. Interested parties were asked to comment within 30 days. Due to technical issues that delayed placing the scoping document on the Forest's web page for several days, the comment period was extended and additional 15 days, which ended January 25, 2008.

Public meetings were held in Ashland, Broadus, Miles City, and Billings, Montana in December 2007 to discuss the scoping document (see Table 2-1).

**Table 2-1. Summary of Public Meetings**

Location	Date/Time	Number of Attendees
<b>Proposed Action Scoping Meetings</b>		
Ashland, MT	December 11, 2007, 6:00-8:00 pm	28
Miles City, MT	December 12, 2007, 6:00-8:00 pm	5
Billings, MT	December 13, 2007, 6:00-8:00 pm	25
Broadus, MT	December 17, 2007, 6:00-8:00 pm	6
<b>DEIS Public Meetings</b>		
Broadus, MT	October 27, 2008, 1:00 pm	0
Ashland, MT	October 27, 2008, 6:00 pm	11
Colstrip, MT	October 28, 2008, 6:00 pm	10
Billings, MT	October 29, 2008, 6:00 pm	11

In response to these efforts, just over 60 letters, personal comments, emails, or phone calls were received. The analysis of electronic, written, and verbal comments preliminarily identified several potential issues. Three of these issues were identified as significant and were used to formulate elements of the alternatives (see Issues section below).

### **2.3.2 NOTICE OF INTENT**

A Notice of Intent (NOI) to prepare an Environmental Impact Statement was published in the Federal Register on September 5, 2008. The NOI identified that when the Draft Environmental Impact Statement was distributed, the public would have a 45-day comment period from the date when the Environmental Protection Agency publishes the Notice of Availability in the Federal Register. Also, a news release will be provided to local news media at the beginning of the 45-day comment period on the Draft EIS.

### **2.3.3 PUBLIC INVOLVEMENT FOR THE DEIS**

The Notice of Availability for the Draft EIS was published in the Federal Register October 3, 2008 which began a 45-day comment period. In response to a public request, the comment period was extended 15 days for a total of 60 days. News releases were provided to local news media at the beginning of the comment period. The Draft EIS was distributed to interested parties identified in the updated District Travel Management Planning EIS mailing list on September 26, 2008. The DEIS was also posted on the Forest's web page. The Forest conducted four public open houses to provide information and encourage input on the DEIS (see Table 2-1). The public open house meetings

provided the public with the opportunity for one-on-one discussions with the District Ranger and interdisciplinary team members. In response to the comment period, the Forest received 44 comment letters, e-mails, and documented phone conversations on the DEIS. One of the 44 letters was received after the comment period deadline. Further information on commenters, substantive comments identified in the letters, e-mails, and phone conversations, and agency responses to comments can be found in Chapter 5.

## 2.4 SIGNIFICANT ISSUES

One purpose of scoping is to identify the significant issues that should be analyzed in depth within an EIS (40 CFR 1501.7). The significant issues become the focus of the analysis and guide alternative development. All public scoping comments were considered by the interdisciplinary team and Responsible Official, and are documented in the project record.

The IDT used the public comments on the scoping document, along with internal scoping, to develop a list of issues related to potential effects of this project. The IDT and the District Ranger went through a process to identify the significant issues to be analyzed in depth in the EIS versus those which are not significant and therefore only warrant brief discussion of why they are not considered significant. In general, the significant issues identified through that process represent those resources with the greatest potential to be significantly impacted by the project. Significant issues pertain to resources or other components of the environment that are of public value or interest and that are sensitive to potential changes in travel management. The Forest Supervisor concurred with the list of significant and other than significant issues. These issues were used to develop the range of alternatives and are analyzed in detail in Chapter 3. The list of other than significant issues are addressed in Section 2.4

No additional significant issues were identified during the comment period for the Draft EIS.

### 2.4.1 RECREATION

**Concern about motorized recreation opportunities.** Reductions in the amount of routes available for motorized use could reduce the opportunities available for motorized recreation, diminish the ability to retrieve big game using motorized routes, and reduce dispersed camping opportunities. Alternative A and elements of Alternative B Modified were developed to respond to this issue.

Indicators:

- Acres in rural, roaded natural, and semi-primitive motorized ROS settings within the District.
- Miles of motorized system roads and trails to be designated on the District.

**Concern about non-motorized recreation opportunities.** Increases in the amount of routes designated for motorized use could reduce the quality of non-motorized recreation experiences, reduce opportunities for non-motorized big game hunting opportunities, and reduce opportunities for solitude, away from noise generated by motorized vehicles. Elements of Alternative B and Alternative B Modified were developed in response to this issue.

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### Indicators:

- Acres in semi-primitive non-motorized settings within the District, including inside and outside of Hiking and Riding Areas.
- Acres in semi-primitive non-motorized settings within the District during big game hunting seasons, including inside and outside of Hiking and Riding Areas.

**Concern about opportunities for off-highway vehicle operation.** The use of unlicensed off-highway vehicles on roads is not consistent with State of Montana motor vehicle laws. Designating roads (as opposed to motorized mixed use roads or motorized trails) would limit opportunities for off-highway vehicle use. This issue was used in designing Alternatives A, B, and B Modified.

### Indicators:

- Miles of mixed use system roads in the project area.
- Miles of motorized system trails in the project area.

**Concern about impacts on personal recreation experiences.** The Forest Service and commenters recognized the potential for travel management changes to not only impact individual's personal experiences and connection to forest lands, but it also has the potential to increase or decrease conflict between forest users, particularly between motorized and non-motorized uses. Alternatives B and B Modified were developed in part to address concerns such as these.

### 2.4.2 CULTURAL RESOURCES

**Concern about protection of archeological sites, traditional cultural properties, and traditional practices.** Actions associated with designation, such as converting non-system routes to system routes, have the potential to adversely impact the scientific, traditional, cultural, and intrinsic values of archeological, cultural, and historic sites. In addition, proposed actions could have an adverse effect to certain areas of traditional importance to local tribes.

### Indicators:

- Total number of cultural resource sites within the Area of Potential Effect (APE).
- Number of priority asset sites within the APE.
- Number of culturally sensitive sites within the APE.

### 2.4.3 WILDLIFE

**Concern about disturbance of wildlife and impacts to wildlife habitat.** Human use associated with system and non-system road and trail designation has the potential to disturb wildlife through noise and visual effects. Human use can disrupt activities such as foraging habits, resting location selection and duration, nesting, and denning. In addition, changes in road densities can affect the quality of wildlife habitat. The Forest Service identified and analyzed the effects of travel management alternatives on federally threatened, Forest Service sensitive, big-game, and other wildlife species and their habitat.

Indicators:

- Effects determinations for federally listed threatened or endangered species, Forest Service sensitive species, Custer National Forest management indicator species, and other species of concern.
- Deer and Elk – Motorized Route Density and Percent secure habitat within deer and elk habitat on the District.
- General wildlife – Percent of land unit that is core wildlife habitat based on motorized and non-motorized routes on the District.

## **2.5 OTHER ISSUES**

The Council on Environmental Quality Regulations Implementing the National Environmental Policy Act states that agencies should discuss, “only briefly issues other than significant ones” (40 CFR 1500.4[c]). The following issues were determined to not be significant issues because they did not drive development of alternatives or major components of alternatives, there were no significant effects associated with the proposed actions, or both.

### **2.5.1 WATER QUALITY, FISHERIES, AND AQUATICS**

The action of adding routes to the system has the potential to influence water quality indirectly through on-site erosion and sediment delivery to streams. Actions can also influence water quality and channel processes as a result of improper route location.

Indicators:

- Miles of actions that reduce risks on routes within the project area.
- Miles of actions that increase risks on routes within the project area.
- Effects determinations for listed Forest Service sensitive species and other species of concern.

### **2.5.2 SOILS**

Adding routes to the transportation system on high and medium risk soils could increase the potential to compact, displace, or erode soils such that there is a loss of soil productivity.

Indicator:

- Miles of motorized routes by high/very high and medium erosion hazard rating on the District.

### **2.5.3 VEGETATION**

Concerns have been expressed about the effects of designating routes on native and rare vegetation found on the District. Designation of additional system roads and trails, along with the associated dispersed vehicle camping, has the potential to cause ground disturbance that could lead to noxious weed establishment and/or encouraging spreading.

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### Indicators:

- Acres and Percent of potential vegetation impacts by moderate risk category for motorized routes on the District.
- Weed susceptible Acres within designated road corridors within the project area.
- Total weed infested Acres within motorized route potentially affected corridor.
- Effects determinations for listed Forest Service sensitive species and other species of concern.

### 2.5.4 *ECONOMICS*

The functional economic area that surrounds the District consists of Rosebud County and Powder River counties in Montana and the immediate surrounding counties. For the two-county functional economic area evaluated, the total economic effects of recreation overall, and specifically recreation tied to motorized and non-motorized activities, are very small compared to the total economic activity in the area. Though changes in use attributable to the alternatives outlined in the economic report are difficult to estimate (see Project Record), the dominance of hunting as a recreation choice and the expectation that the number of hunters using the District is not expected to change as a result of the alternatives (see Chapter 3 Recreation) means that the proposed travel management changes would have little effect on the overall economy of the two-county area.

Given this information, no further discussion of this issue is included in the EIS.

### 2.5.5 *AIR QUALITY*

There is concern that the addition of routes to the transportation system may lead to an adverse impact on air quality. Encountering motorized use emissions and fugitive dust on Forest roads and trails could have an undesirable effect on the quality of a recreational experience. These effects are typically transitory in nature and not long lasting. There are typically good air dispersion characteristics and low inversion potential across the District. In addition, traffic is generally at lower speeds that result in less dust generation.

Air quality across the District is considered good to excellent. All areas within and immediately adjacent to the District currently meet all state and federal air quality standards (MTDEQ, 2008). The nearest Montana non-attainment area for particulate matter is Lame Deer, MT (approx. 30 miles west) and Laurel, MT (approx. 150 miles west) with sulfur dioxide concerns.

The Northern Cheyenne Reservation is a non-federal Class 1 Area under the 1977 Clean Air Act. This area is located west of the Ashland District and prevailing winds are from the southwest. The nearest areas of non-attainment are Lame Deer, MT for particulate matter (approximately 30 miles west) and Laurel, MT for sulfur dioxide levels (approx. 140 miles west). Implementation of any of the alternatives is expected to maintain air quality conditions due to 1) good dispersion characteristics across the District, 2) low inversion potential across the District, 3) low emissions from vehicles relative to other potential sources, and 4) reduced or equivalent route miles open to motorized vehicles under all alternatives compared to the existing condition. Compliance with State and Federal air quality standards would occur under all alternatives. Given this information, no further discussion of this issue is included in the EIS.

### **2.5.6 HIKING AND RIDING AREAS (MANAGEMENT AREA J)**

A concern was identified regarding motorized recreation within the Hiking and Riding Areas (HRA) on the District and the potential that motorized activities have to diminish the characteristics of those areas. There are three HRAs on the District – the Cook Mountain, King Mountain, and Tongue River Breaks HRAs. There are currently 20.6 miles of system routes within the HRAs. The Forest Plan prohibits public motorized use of these areas, but allows some management activities including motorized vehicle use associated with grazing activities (USDA Forest Service 1987). The existing routes are used infrequently for administrative purposes.

Alternatives A and B would reduce the overall miles of motorized routes by 11.4 miles within HRAs, compared to the No Action Alternative. None of the alternatives would cause irreversible or irretrievable effects to the existing characteristics of the HRAs. All of the alternatives would comply with existing law, regulation, and policy. Since public motorized use is not currently allowed within the HRAs and the action alternatives would reduce the administrative routes by 11.4 miles, this issue will not be analyzed further in the EIS.

### **2.5.7 ENFORCEMENT**

Public comment related to law enforcement issues focused on enforcing regulations, providing more law enforcement presence, and providing the public with signing and education. These comments tended to concentrate on motorized activities on the forest, and were raised by both motorized and non-motorized recreationists. A number of comments highlighted impacts associated with the lack of enforcement, such as resource damage and diminished recreation experience for other forest visitors. Some comments suggested that there was a need for additional law enforcement personnel to handle the increase of motorized use on the forest.

In 2005, the Motorized Travel Rule changed the legal authority for regulating off-route travel of motor vehicles. The final rule modified regulations in 36 CFR 295 which historically governed the management of OHVs on National Forests. In addition, the rule changed the enforcement authority for motor vehicle restrictions from 36 CFR 261 Subpart B: Special Orders to the Subpart A: General Prohibitions section, making motor vehicle violations in the future a strict liability infraction. This change relieves the Agency of the posting and signing requirements of 36 CFR 261 Subpart B and authorizes map notification to be the enforcement tool in the future. The decision mandates that Districts and administrative units complete a travel management review with public involvement to designate motorized roads, trails, and areas and produce Motor Vehicle Use Map (MVUM) that identifies these designations (36 CFR 212.56). Once this is completed, travel management restrictions may be enforced under Subpart A without being required to post and maintain prohibition signs in the field. This change is expected to improve enforceability of motor vehicle operation violations.

In addition, the text on the MVUM will include standardized information on the purpose and content of the map as well as a statement about motorized vehicle operator's responsibilities and fines. The text states, "It is prohibited to possess or operate a motor vehicle on National Forest System lands on the Ashland Ranger District other than in accordance with these designations (36 CFR 261.13). Violations of 36 CFR 261.13 are subject to a fine of up to \$5,000 or imprisonment for up to 6 months or both (18 U.S.C. 3571(e))."

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Currently, there is one full-time Law Enforcement Officer (LEO) stationed on the Custer National Forest. The District also has permanent staff trained as Forest Protection Officers (FPO). FPOs have limited law enforcement authority and responsibilities compared to LEOs, but are capable of issuing citations for travel management violations associated with the prohibition created under the 2005 Motorized Travel Rule found at 36 CFR 261.13. Changes in the budget to facilitate increases in law enforcement capability can be accomplished through changes in allocations within Forest budgets, securing additional budget funding from within the Northern Region, or supplementing budgets with grants and similar funds.

Changes in Forest priorities to increase law enforcement capability would most likely occur through two options. First, the Forest can determine which programs, such as developed recreation, travel management enforcement, wildlife, etc., should be emphasized and allocate the funds to accomplish objectives related to those priorities. Another method is to prioritize the work of existing permanent staff so that there is increased emphasis on enforcement of travel management violations.

Given this information and the fact that law enforcement is an administrative rather than biophysical aspect of travel management planning, no further discussion of this issue is included in the EIS.

### **2.5.8 CLIMATE CHANGE**

A January 13, 2009 Forest Service document titled *Climate Change Considerations in Project Level NEPA Analysis* states, "It is not currently feasible to quantify the indirect effects of individual or multiple projects on global climate change and therefore determining significant effects of those projects or project alternatives on global climate change cannot be made at any scale." (USDA Forest Service, 2009) This project only has the potential to have indirect effects on global climate change, if any, and will not have any direct effects, because the scope of the project is limited to designating routes for motor vehicle use. Given this information, no further discussion of this issue is included in the EIS.

## **2.6 ALTERNATIVES CONSIDERED IN DETAIL**

In response to agency and public issues, three action alternatives were developed. Alternatives A, B, and B Modified were analyzed in detail along with the No Action Alternative. A general description of each of the alternatives is provided below.

Tables 2-3 and 2-4 are intended to provide readers with comparative information about the alternatives that is not strictly focused on changes from no action. For the action alternatives, the figures in the tables represent the total miles available under each table category if that alternative is implemented. The figures used for the No Action Alternative represent the current miles for each of the categories listed.

Table 2-5 summarizes important features and rationale for each of the alternatives. Detailed information on the alternatives is displayed on the comparison maps (see Map Package) and in the route specific tables provided in Appendix C.

### 2.6.1 ALTERNATIVE A (EXISTING CONDITION)

Alternative A was developed in response to multiple public comments expressing a desire to designate most or all of the motorized routes identified in the 1999-2000 inventory of the District for public motorized use. This alternative consists of routes identified during the 1999-2000 inventory, excluding:

1. Routes that have been decommissioned, obliterated, or are otherwise unavailable for public motorized use based on documented decisions since 2000.
2. Routes for which the Forest Service has no legal right-of-way for public use. This is necessary to be in compliance with the 2005 Motorized Travel Rule guidance and to make this alternative viable for implementation. These routes were either identified as candidates for decommissioning/obliteration or, if an administrative need was identified, they were proposed for administrative use only. This affects 74 miles of routes.
3. Existing administrative routes, which would remain administrative use only (61 miles).

Consequently, Alternative A includes designating the majority of both system and non-system routes on the District for public motorized use. Primary motorized travelways would either be designated as roads, or where appropriate, as mixed motorized use roads. For the most part, all other routes would be designated as motorized trails. To maximize motorized opportunities, no season of use would be designated on any routes, and motorized trails would be designated for use by all motor vehicles. This alternative approximates the existing condition (e.g. motorized use of existing system and non-system routes).

Designation of motorized trails under this alternative is intended to: 1) expand opportunities for motorized recreation opportunities, and 2) more accurately describe the characteristics and nature of these routes. In other words, routes proposed to be motorized trails do not display characteristics typically associated with roads, such as surfacing, engineering, and prescribed clearing widths. In many cases, the routes were not engineered, do not have any surfacing which has resulted in rutting and no defined drainage, and they may become impassable when wet.

This alternative includes the following actions (see Appendix C for route specific actions and rationale):

- Add 126 miles of non-system routes to the transportation system as either roads or motorized trails; 123 miles for public motorized use and 3 miles for administrative use.
- Identify 22 miles of system roads (two roads) as candidates for decommissioning.
- Identify 44 miles of existing system roads for administrative use.
- Convert 492 miles of system roads to system motorized trails open to all motor vehicles.
- Designate 37 miles of system roads for mixed motorized use.

The 2001 Tri-State OHV Decision authorized dispersed vehicle camping within 300 feet of motorized routes on the District. During the past eight years, the District has not observed unacceptable adverse impacts from this activity that warrants proposing a change to this activity under this alternative.

The tables at the end of this section provide a summary of the elements associated with this alternative (Table 2-5) and a summary of alternative mileages (Tables 2-3 and 2-4). Appendix C provides a list of the route specific actions proposed under this alternative.

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This alternative largely reflects an alternative submitted in response to the proposed action by a combination of organizations that partnered together to develop the alternative (further described in Section 2.6.1). Some elements in the partnership's proposal were not included in Alternative A because they were not consistent with guidance related to the 2005 Motorized Travel Rule (e.g. designation of roads with no legal right-of-way).

### 2.6.2 ALTERNATIVE B

Alternative B consists of designating a system of motorized routes that provides the public with motorized recreation opportunities, while addressing resource concerns and recreation opportunity concerns. Primary travelways included in this alternative would be designated as roads, or where appropriate, as mixed motorized use roads, and, for the most part, all other routes would be designated as motorized trails. Designation of motorized trails under this alternative is intended to: 1) expand opportunities for motorized recreation opportunities, and 2) more accurately describe the characteristics and nature of these routes. In other words, routes proposed to be motorized trails do not display characteristics typically associated with roads, such as surfacing, engineering, and prescribed clearing widths. In many cases, the routes were not engineered, do not have any surfacing which has resulted in rutting and no defined drainage, and they may become impassable when wet.

The Forest Service followed this general screening process to develop this alternative:

1. System and non-system routes for which the Forest Service did not have a legal right-of-way for public motorized use were evaluated to determine if administrative use was needed. If needed, the routes were proposed for administrative use, if they were not needed they were identified as candidates for decommissioning or obliteration.
2. Recent decisions on actions within the District that involved travel management were reviewed to determine if the rationale was still appropriate/applicable and if there was any new information that would warrant a change.
3. The remaining system and non-system routes were evaluated to determine if there was an administrative, utilization (including recreation), resource, or protection need for the route. If a need existed, system routes were proposed for designation and non-system routes were proposed to be added to the system and designated. If no need was identified, system routes were identified as candidates for decommissioning and non-system routes were identified as candidates for obliteration.
4. At the same time, the Forest Service also assessed whether routes were parallel with each other, i.e. routes that were generally within ½ mile of each other. Where parallel routes existed, only one route was selected for public motorized designation.
5. Finally, based on public input, a season of use that limited motorized travel in key wildlife security habitat areas during big-game hunting seasons was developed. The purpose of this measure was to provide additional wildlife security and increase opportunities for non-motorized hunting. District personnel identified routes within Forest Plan Management Area D (wildlife emphasis areas) and proposed to enhance wildlife security and non-motorized hunting opportunities during Montana Fish, Wildlife, and Parks archery and rifle big-game hunting seasons – September 1 to December 1.

This alternative includes the following actions (see Appendix C for route specific actions and rationale):

- Add 56 miles of non-system routes to the transportation system as either roads or motorized trails; 18 miles for public motorized use and 38 miles for administrative use.
- Identify 75 miles of system roads as candidates for decommissioning.
- Identify 91 miles of existing system roads for administrative use.
- Convert 392 miles of system roads to system motorized trails open to all motor vehicles.
- Designate 37 miles of system roads for mixed motorized use.
- Designate a season of use of December 2 – August 31 on 18 miles of system roads and motorized trails.

The 2001 Tri-State OHV Decision authorized dispersed vehicle camping within 300 feet of motorized routes on the District. During the past eight years, the District has not observed unacceptable adverse impacts from this activity that warrants proposing a change to this activity under this alternative.

The tables at the end of this section provide a summary of the elements associated with this alternative (Table 2-5) and a summary of alternative mileages (Tables 2-3 and 2-4). Appendix C provides a list of the route specific actions proposed under this alternative.

### ***2.6.3 ALTERNATIVE B MODIFIED (PREFERRED ALTERNATIVE)***

Alternative B Modified is largely the same as Alternative B, but has been modified to respond to public and internal concerns. The differences between the alternatives are summarized in Table 2-2.

This alternative includes the following actions (see Appendix C for route specific actions and rationale):

- Add 64 miles of non-system routes to the transportation system as either roads or motorized trails; 26 miles for public motorized use and 38 miles for administrative use.
- Identify 80 miles of system roads as candidates for decommissioning.
- Identify 80 miles of existing system roads for administrative use.
- Convert 400 miles of system roads to system motorized trails open to all motor vehicles.
- Designate 37 miles of system roads for mixed motorized use.
- Designate a season of use of December 2 – August 31 on 27 miles of system roads and motorized trails.

The tables at the end of this section provide a summary of the elements associated with this alternative (Table 2-5) and a summary of alternative mileages (Tables 2-3 and 2-4). Appendix C provides a list of the route specific actions proposed under this alternative.

### ***2.6.4 NO ACTION ALTERNATIVE***

The No Action Alternative consists of designation of the existing system roads<sup>1</sup> on the District. This is different from Alternative A (existing condition) which proposes to designate both existing system

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<sup>1</sup> The decision to use existing system roads as the foundation for no action stems from 2005 Motorized Travel Rule guidance, including the following:

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and non-system routes. The No Action Alternative also includes the existing vehicle types and seasons of use currently in force on the District (see Table 2-5 for details).

Designation of the existing network of system roads would not require any further NEPA and represents the starting point for any proposed changes to the routes or areas available for public motorized use. Based on this information, no action was determined to be designation of the existing system roads and trails.

System roads that the Forest Service does not have legal right-of-way for public access to use will be included in this alternative, unlike the action alternatives. This is because not designating these system roads would constitute an action, which would be inconsistent with the premise of the No Action Alternative.

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- The *Travel Management: Designated Routes and Areas for Motor Vehicle Use* guide prepared by the Forest Service to aid in implementing the 2005 Motorized Travel Rule affirms that the starting point for travel analyses is the current network of system roads.
  - The *Motor Vehicle Route and Area Designation Guide* (version 111705) states, “There is no need to initiate a NEPA process to designate those NFS roads, NFS trails, and areas on NFS lands that are already managed for motor vehicle use where that use will continue unchanged, or to retain existing restrictions on motor vehicle use.”

**Table 2-2. Differences between Alternative B Modified and Alternative B, and the rationale for the modification.**

Alternative B Modified	Alternative B	Route <sup>2</sup>	Rationale for Modification
Designate these system routes with a season of use of 12/2 – 8/31.	Designate these system routes with a yearlong season of use.	40011	Respond to public comments for additional non-motorized hunting opportunities.
		40012	
		40232	
		45023	
		47854	
		47855	
		48012	
Designate these system routes with a yearlong season of use.	Designate these system routes with a season of use of 12/2 – 8/31.	4032	Provides important dispersed vehicle camping opportunity.
		4503	Respond to public comments that the portion of the route before the gate should be designated with a yearlong season of use to provide for important dispersed vehicle camping opportunity; the SOU for the portion behind the gate would not be changed from Alternative B.
Do not designate this route for public motorized use.	Designate as system motorized trail open to all motor vehicles.	40954	There is a fence across this route with no gate and the route is largely revegetated.
		4467	No identified administrative, utilization, or protection need for this route.
		47911	
		4432D	End designation at the fence line - no identified administrative, utilization, or protection need for the route beyond fenceline.
Designate as motorized trail open to all motor vehicles.	System route - candidate for decommissioning.	40957	Provides important dispersed vehicle camping opportunity.
Designate as motorized trail open to vehicles 50 inches or less in width.	Identify as administrative use only.	41338	Respond to public comments to use these routes for game retrieval.
		48058	Respond to public comments to make this a motorized trail that provides additional loop opportunities.
Designate as system motorized trail open to all motor vehicles.	Do not designate this system route for public motorized use.	42123	Respond to public comments to provide additional access in this area and a loop opportunity.
Designate as system motorized trail open to all motor vehicles.	Route was not identified in inventory.	413111	Provides important dispersed vehicle camping opportunity.
Do not add this non-system route to the system.	Add non-system route to the system and designate as a motorized trail open to all motorized vehicles.	47983	The route has naturally revegetated – there is no identified administrative, utilization, or protection need.
Add non-system route to system and designate as motorized trail	Segment A - Add non-system to system and designate as	44094	Respond to public comments to make this a motorized trail that provides additional loop opportunities.

<sup>2</sup> The proposed action may contain all or a portion of the route; see the Alternative B Modified Map and Appendix C for specific portions and segment lengths.

**Table 2-2. Differences between Alternative B Modified and Alternative B, and the rationale for the modification.**

Alternative B Modified	Alternative B	Route <sup>2</sup>	Rationale for Modification
open to vehicles 50 inches or less in width.	administrative use. Segment B - Do not add this non-system route to the system.		
Add non-system route to the system and identify for administrative use only.	Do not add this non-system route to the system.	44103 441042 4410B	Provide administrative access to range improvements.
Do not add this non-system route to the system.	Add non-system to system as a road open to highway legal vehicles.	44235	Address heritage resource concerns with this route.
Do not designate this system route for public motorized use.	Identify as administrative use only.	4432D 4435	No identified administrative, utilization, or protection need for this route.
Identify as administrative use only.	Convert this system road to system motorized trail.	44351	Identify the west portion as administrative only to access a Powerline – no other identified utilization or protection need.
Convert this system road to system motorized trail open to all vehicles.	Identify as administrative use only.	44501	Respond to the public to use this route for a loop opportunity.
Add non-system route to the system and designate as a motorized trail open to all motorized vehicles.	Add non-system route to the system and identify for administrative use only.	44502	Respond to the public to use this route for a loop opportunity.
Convert this system road to system motorized trail open to all vehicles.	Identify as administrative use only.	47696	Respond to the public for access in this area and provides important dispersed vehicle camping.
Do not add this non-system route to the system.	Add non-system to system as a road open to highway legal vehicles.	47905	Address heritage resource concerns with this route.
Add non-system route to system and designate as motorized trail open to vehicles 50 inches or less in width.	Add non-system route to the system and identify for administrative use only.	47704	Respond to the public to use this route additional access and for a loop opportunity.

**Table 2-3. Summary of miles<sup>3</sup> of roads and trails by alternative.**

Route Designation		Alternative A	Alternative B	Alternative B Modified	No Action	
National Forest System Roads and Trails	Public motorized use	Road: All types allowed (motorized mixed use)	37	37	37	0
		Road: Highway legal vehicles	101	101	101	676
		Trail: All types allowed	612	405	406	0
		Trail: Vehicles 50 inches or less	0	0	17	0
	<i>Subtotal</i>		<b>750</b>	<b>543</b>	<b>561</b>	<b>676</b>
	Administrative use		<b>92</b>	<b>175</b>	<b>161</b>	<b>61</b>
	<i>Total Miles of System Routes</i>		<b>842</b>	<b>718</b>	<b>722</b>	<b>737</b>
System roads not designated for public motorized or administrative use		<b>22</b>	<b>75</b>	<b>78</b>	<b>0</b>	
Non-System Routes	Non-system routes not converted to system roads or trails	<b>19</b>	<b>90</b>	<b>83</b>	<b>146</b>	
<i>Total Miles of Routes not designated or not converted for public motorized or administrative use</i>		<b>41</b>	<b>165</b>	<b>161</b>	<b>146</b>	
<b>Total</b>		<b>883</b>	<b>883</b>	<b>883</b>	<b>883</b>	

**Table 2-4. Miles of system roads and trails designated for public motorized use by proposed season of use designation for each alternative.**

Season of Use	Alternative A	Alternative B	Alternative B Modified	No Action
Yearlong	750	525	534	676
December 2 – August 31 (Provide Non-Motorized Hunting)	0	18	27	0
<i>Total</i>	<b>750</b>	<b>543</b>	<b>561</b>	<b>676</b>

<sup>3</sup> Mileage comparison between tables may not be exact due to rounding.

**Table 2–5. Summary of Elements for Each Alternative**

Element	Alternative A (Existing Condition)	Alternative B	Alternative B Modified (Preferred Alternative)	No Action Alternative
Type of Vehicle Designations	<p>In general, primary travelways would be designated as system roads, which are only available for use by highway-legal vehicles.</p> <p>The majority of high clearance vehicle roads (Maintenance Level 2) would be converted to system trails open to all motor vehicles.</p> <p>A limited number of roads would be designated as mixed motorized use where connections between proposed motorized trails were important.</p> <p>(The map package provides a display of the type of vehicle designation for each route.)</p>	Same as Alternative A.	<p>Same as Alternative A, plus:</p> <p>A limited number of trails would be designated for use by vehicles 50 inches or less in width.</p>	System roads would be designated for use by highway legal vehicles.
Season of Use Designations	Season of use for all designated routes is yearlong.	<p>Season of use for all designated routes is yearlong except for the following seasons of use.</p> <p><b>December 2-August 31</b> – 18 miles of routes in three locations would have this season of use to provide additional wildlife security and to increase opportunities for non-motorized hunting. See Appendix C and the map package for the specific routes involved.</p>	<p>Season of use for all designated routes is yearlong except for the following seasons of use.</p> <p><b>December 2-August 31</b> – 27 miles of routes in six locations would have this season of use to provide additional wildlife security and to increase opportunities for non-motorized hunting. See Appendix C and the map package for the specific routes involved.</p>	Same as Alternative A.
Dispersed Vehicle Camping Designations	Access for dispersed vehicle camping would be allowed within 300 feet of all designated system roads and motorized trails on the District.	Same as Alternative A.	Same as Alternative A.	Same as Alternative A.

**Table 2–5. Summary of Elements for Each Alternative**

Element	Alternative A (Existing Condition)	Alternative B	Alternative B Modified (Preferred Alternative)	No Action Alternative
Administrative Use	<p>Roads identified for administrative use are not designated for public motorized use due to: 1) the lack of legal right-of-way for public access, 2) existing administrative use roads at administrative sites, 3) and past decisions. Appendix C includes all non-system roads that would be converted to system roads and identified for administrative use, as well as any additional system roads that would be identified for administrative use.</p>	<p>Roads identified for administrative use are not designated for public motorized use due to: 1) the lack of legal right-of-way for public access, 2) existing administrative use roads at administrative sites, 3) past decisions, and 4) to provide needed administrative access to powerlines, range improvements, etc. when this is the only identified need for the route, such as a parallel route. Appendix C includes all non-system roads that would be converted to system roads and identified for administrative use, as well as any additional system roads that would be identified for administrative use.</p>	<p>Same as Alternative B.</p>	<p>Roads identified for administrative use are not designated for public motorized use based on policy (administrative sites) and past land management decisions. This alternative includes only those roads currently identified for administrative use.</p>

**2.6.5 ELEMENTS COMMON TO ALL ALTERNATIVES**

**2.6.5.1 Administrative Exemptions**

Exemptions to off road travel as described in 36 CFR 212.51(a) would be allowed. Exemptions include administrative activities such as law enforcement, fire, emergencies, military operations, noxious weed control, permit activities, and other official business purposes. All such use requires authorization from the appropriate Line Officer, detailing when, where, who, and under what circumstances motorized travel would be allowed.

**2.6.5.2 Administrative Sites**

System roads associated with administrative sites will not be designated for public motorized use, except those roads that provide access to visitor services.

**2.6.5.3 System Roads with Forest Service Maintenance Obligations**

System roads that the FS has a legal obligation to maintain will not be removed from the system, but may or may not be designated for public motorized use.

**2.6.5.4 Roads Under Permit**

In instances of special use permits for ingress/egress to private inholdings, a road will generally be designated for public motorized use when the Forest Service has road maintenance responsibilities. In instances of road use permits, a road may be closed to public use when the permit holder is assigned road maintenance responsibilities.

**2.6.5.5 No Legal Right-of-Way for Public Access**

Routes that the Forest Service has no legal right-of-way for public motorized access will not be designated for public motorized use.

**2.6.5.6 Designated Routes Required to be Part of the National Forest System**

In accordance with the 2005 Motorized Travel Rule, only system routes can be designated for public motorized use. If motorized routes that are currently non-system roads are desired for motorized use, an action is required to add them to National Forest transportation system.

**2.6.5.7 Dispersed Vehicle Camping Authorized Only on National Forest System Lands**

Under Alternatives that allow access for dispersed vehicle camping within 300 feet of a motorized route, access is only authorized on NFS lands, not on private, state, or other federal lands that may be within 300 feet of designated routes.

### 2.6.5.8 Implementation

In order to implement this project, the 2005 Motorized Travel Rule requires the Forest to make a Motor Vehicle Use Map available to the public, free of charge. The Forest also expects to install signs on all designated routes, undertake an estimated two year education campaign regarding new travel management direction and rules, and patrolling. These activities, other than publishing the MVUM, may vary in extent subject to the availability of funding.

Until the Record of Decision (ROD) for this project is implemented, the current decisions for the existing network of system roads remain in effect. The ROD and its implementation will supercede the existing network of motorized system roads when the Motor Vehicle Use Map is published and any associated orders are in place.

Sign purchase and installation is a one time cost, but the remaining costs such as patrolling and Motor Vehicle Use Map production would be incurred annually. Annual funding levels are subject to variation.

## 2.7 ALTERNATIVES CONSIDERED BUT DROPPED FROM DETAILED ANALYSIS

Federal agencies are required by NEPA to rigorously explore and objectively evaluate all reasonable alternatives and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14). Public comments received in response to the Proposed Action provided suggestions for alternative methods for achieving the purpose and need. Some of these alternatives may have been outside the scope of travel management, duplicative of the alternatives considered in detail, incorporated into alternatives considered in detail, determined to be components that would cause unnecessary environmental harm, or are already addressed by law, regulation or policy. Therefore, a number of alternatives were considered, but dismissed from detailed consideration for the reasons summarized below.

### 2.7.1 PARTNERSHIP ALTERNATIVE

This commentor-submitted alternative was intended to maximize motorized recreation opportunities on the District, and would have included designation of the majority of the routes in the District. Fourteen organizations partnered to develop this alternative. The organizations are:

Treasure State ATV	Great Falls Trail Bike Riders Association
Rimrock 4X4 Inc.	Park City Recreation Association
Treasure State Alliance	Montana Trail Vehicle Riders Association
Billings Motorcycle Club	Families For Outdoor Recreation
Laurel Rod and Gun Club	Magic City 4 Wheelers Inc.
Colstrip ATV Association	Great Falls Trail Bike Riders Association
Colstrip Gun Club	Park City Recreation Association
Citizens for Balanced Use	Montana Trail Vehicle Riders Association
Custer Rod and Gun Club	Families For Outdoor Recreation

Alternative A is similar to this alternative; however the alternative included designation of routes for which the Forest Service has no legal right-of-way for public access. Consequently, the alternative, as submitted, has been dropped since it does not comply with the 2005 Motorized Travel Rule guidance.

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Alternative A is intended to reflect the concerns identified in the submitted alternative while also complying with the 2005 Motorized Travel Rule guidance.

### ***2.7.2 SEPARATE MOTORIZED AND NON-MOTORIZED USES***

The public suggested separating or zoning motorized and non-motorized use on the District to reduce user conflicts. Zoning areas by type of use or similar management prescription is more appropriate for land management planning. This analysis is focused on the designation and use of motorized routes (roads and trails), rather than prescriptive land use direction that would require a significant amendment of current Forest Plan land use direction which is beyond the scope of this analysis.

### ***2.7.3 ESTABLISH TRIGGERS FOR ROUTE CLOSURES***

Commenters suggested that “triggers” and responses should be established “when user created routes are illegally established”, or if there are excessive resource impacts. First, the Motor Vehicle Use Map (MVUM) establishes those routes available for public motorized use. Any use that is not in compliance with the MVUM is illegal. No additional trigger is necessary to enforce public motorized use on the District.

The 2005 Motorized Travel Rule requires National Forests to monitor the effects of travel management decisions and use in accordance with Forest Plans where decisions are implemented. The Forest Plan for the Custer includes monitoring of travel management decisions. This travel management decision, whichever alternative is selected, would be implemented in compliance with the Forest Plan. This monitoring is intended to serve as the trigger for changing or modifying travel management decisions due to unacceptable resource impacts.

### ***2.7.4 ADMINISTRATIVE ROUTES BE DESIGNATED FOR PUBLIC MOTORIZED USE***

There are multiple reasons why routes are proposed for administrative use only. They include concerns such as vandalism of facilities or cultural resources and lack of a legal right-of-way for public use. However, there may be a need for occasional administrative use of the route for activities such as maintaining facilities. Maintaining these routes for administrative use is especially important where disposal of the route would then have required cross-country vehicle travel, a practice discouraged by the agency, to accomplish the administrative work.

It is neither practical or, in some cases, in compliance with agency guidance to allow public use on routes identified for administrative use.

### ***2.7.5 DO NOT DESIGNATE ROAD #4797***

One commenter indicated that road #4797 should not be designated because it goes through riparian areas and across a dam. Field observations indicate that the route does not go through any riparian areas. The route does cross a portion of the dam for the Three X Bar Reservoir. This route has gone over the dam for many years and there are no signs of rutting or other cause for concern based on field observations of both engineering and range staff on the Forest. Given this information and the importance of this route for access to the area, the Forest does not intend to modify or create an alternative based on this comment.

**2.7.6 ROUTES SHOULD NOT BE DESIGNATED ON HIGHLY ERODIBLE SOILS, RIPARIAN AREAS, WETLANDS, WET MEADOWS, AND EPHEMERAL PONDS**

There are bands of highly erodible soils throughout the District. Numerous routes intersect these bands for varied distances. It would not be practical to eliminate all routes or portions of routes on highly erodible soils, and have a functioning network of routes to adequately administer, utilize, and protect District lands and resources. In some cases, hardening, surfacing, or other measures are in place to minimize impacts to these resources. Locations of route segments that would be improved by implementing similar measures will be considered for addition to the list of opportunities contained in Appendix D of the environmental document. Finally, the effects of route designation on the resources mentioned above will be evaluated and disclosed in the environmental document.

**2.7.7 DO NOT ADD ROUTES OR FURTHER REDUCE MILES OF ROUTES IN MODERATE AND HIGH RISK SOILS AND THAT HAVE WATER QUALITY IMPACTS IN HIGH RISK WATERSHEDS, TO REDUCE IMPACTS IN THOSE WATERSHEDS.**

In compliance with NEPA, this EIS includes limited analysis of these two non-significant "other issues", water quality and soils. This proposal was not intended to resolve all issues with existing routes, nor was the analysis for soils and water quality intended to pinpoint what effect specific routes proposed to be added to the system may have on individual watersheds. It was used to indicate if the proposal moved water quality and soils impacts in a beneficial or adverse direction on a watershed basis. Opportunities to further reduce risks and/or mitigate impacts that are outside the scope of this analysis are identified in Appendix D.

**2.7.8 DO NOT DESIGNATE DISPERSED VEHICLE CAMPING IN AREAS WITH STEEP TOPOGRAPHY AND SENSITIVE RESOURCES TO AVOID POTENTIAL ADVERSE IMPACTS**

This concern was indirectly considered when developing Alternative B and Alternative B Modified. No site-specific areas of concern with dispersed vehicle camping were identified. In determining whether to designate dispersed vehicle camping, the IDT did consider: 1) that there have not been any specific issues identified during the last 8 years of this activity that indicate the 300 foot allowance has been an issue; 2) the period of highest use on the District is during the fall, when conditions are at their driest reducing the potential for soil, water quality and similar resource impacts; 3) many sensitive areas are not desirable for dispersed vehicle camping (wetlands, grades greater than 6%, etc.); 4) terrain tends to limit where visitors tend to camp; 5) typically, heavy use occurs in same location every year and these locations have not been in sensitive areas.

**2.7.9 FURTHER REDUCE MOTORIZED USE TO MINIMIZE THE POTENTIAL FOR SPREAD OF NOXIOUS WEEDS**

Alternatives B and B Modified would not designate routes that bisect the most problematic weed infestations. Weeds will continue to spread as a result of motorized and non-motorized resource management activities, recreational use, wildlife, and natural processes. In compliance with the 2006 Custer National Forest Weed EIS and ROD, the Forest Service will monitor routes for early detection of new weed infestations and treat them, and will treat road corridors to reduce the effects of weed spread.

**2.7.10 INCREASE SECURE COVER TO 30-50% OF FORESTED AREA**

Alternatives B and B Modified exceed the regional protocol to maintain 30% secure habitat for elk. There is no identified biological need to provide more secure habitat than identified in the regional protocol.

**2.7.11 THERE SHOULD BE A MINIMUM 30% OF THE DISTRICT IN NON-MOTORIZED SETTINGS TO PROVIDE ADEQUATE NON-MOTORIZED HUNTING OPPORTUNITIES**

Establishing land allocations for types of recreational use (for example, 30% of District for walk-in hunting) are outside the scope of travel planning, and would more appropriately be addressed in Forest-wide land management planning. This process is intended to facilitate a mix of recreational opportunities with consideration of topographic features and vegetation and be in compliance with the current Custer National Forest Land and Resource Plan.

**2.7.12 DO NOT CONVERT ROADS TO TRAILS, OR CONVERT NO MORE THAN 10%, OR LIMIT TRAILS TO 50 INCH OR LESS VEHICLES TO DISCOURAGE ADDITIONAL USE AND THE IMPACT IT WOULD HAVE ON EXISTING USES**

There is little information available to determine if designating motorized trails will or will not encourage any additional recreational use of the District. Forest Service observations also indicate that unlicensed vehicles are currently being used on the District during hunting season. Designating trails is intended, in part, to accommodate this use rather than attempting to generate new use. Forest Service staff field observations suggest that District recreational use is low outside of hunting seasons, thus conflicts are not anticipated during these times.

**2.7.13 SEASONALLY CLOSE ADMINISTRATIVE ROADS DURING BIG GAME HUNTING SEASON**

Use of administrative roads by permittees is addressed through their permits and based on specific allotment operational needs, such as operation and maintenance of water resources and powerlines, herd management, and similar activities. Many of these activities are required to occur after September 1 and it would not be practical or responsible to eliminate them. Regulating these types of activities is outside the scope of this analysis, which is focused on public motorized use.

**2.7.14 THERE SHOULD BE NO NET LOSS OF MOTORIZED OPPORTUNITIES TO COUNTER THE CUMULATIVE LOSS OF OTHER MOTORIZED OPPORTUNITIES**

No net loss of motorized opportunities is assumed to mean no net loss in the current miles of system and non-system motorized routes on the District. Crafting an alternative that yielded no net loss of motorized opportunities would require construction of new motorized routes to offset routes that cannot legally be designated (no legal public right-of-way) or are irresponsible to designate (human health and safety or resource concerns). Construction of routes is outside the scope of this process; therefore technically it is not feasible under this proposal to create an alternative that will result in no

net loss of motorized opportunities as defined above. However, the addition of nearly all of the non-system motorized routes on the District is considered in Alternative A.

**2.7.15 PROVIDE ADDITIONAL MOTORIZED OPPORTUNITIES BY DESIGNATING ROUTES CLOSED BECAUSE THEY CANNOT ACCOMMODATE A FULL-SIZE VEHICLE FOR 50 INCH WIDE OR LESS VEHICLES**

In Alternatives B and B Modified, routes that were not designated were done so because of resource concerns; human health and safety concerns; the route has naturally re-vegetated; the route is parallel to another motorized route; or because there was no legal public right-of-way. Designating these routes for motorized use would be counter to the rationale used to develop these alternatives. In Alternative A, only a limited number of routes were not designated, which would not be designated regardless of vehicle type (i.e. no legal public right-of-way).

**2.7.16 EXPAND SECURE ELK HABITAT TO MAINTAIN A VIABLE AND HEALTHY ELK POPULATION**

Alternatives B and B Modified exceed the regional protocol to maintain 30% secure habitat for elk. There is no identified biological need to provide more secure habitat than identified in the regional protocol.

**2.7.17 FURTHER RESTRICT MOTORIZED USE TO PROTECT CULTURAL RESOURCES FROM IMPACTS**

Several system and non-system routes in Alternative B Modified will not be designated in order to reduce impacts to heritage resources. The updated Forest Service Trails Handbook (October, 2008) resolves concerns with converting roads to motorized trails, because it establishes maintenance standards for motorized trails that are similar to road standards. Furthermore, sites crossed by proposed motorized trails were sampled and a determination was made that the sites are stable and increased vehicle use is not expected to effect these sites. Finally, sites that may be at risk due to a variety of circumstances will be monitored as per the Site Identification Strategy (SIS) as part of the Programmatic Agreement. Cultural resource site monitoring will continue and if effects to cultural resources are observed, regardless of the source, plans to remove, reduce or mitigate the effects will be pursued.

**2.7.18 PROTECT WATER QUALITY LIMITED STREAMS IN NEED OF TMDL DETERMINATION AND WATERSHEDS LISTED AS HIGH RISK**

No TMDLs are located within the Forest boundary and only one is located immediately downstream; Lower Hanging Woman. Tributaries to Lower Hanging Woman that are within the Forest boundary are identified in Chapter 3, Water Quality Section, table titled *Summary of Streams on the 2006 Montana 303(d) List Within or Immediately Adjacent to the District*. The TMDL for Hanging Woman has not yet begun. EF Armells and Little Porcupine Creeks are located far from the District, in fact, Little Porcupine Creek is all the way on the north side of the Yellowstone River. Category 3 TMDL streams have not had beneficial uses assessed, and therefore causes and sources have not been identified. However, moderate and high risk Category 3 TMDL streams carried forward to effects analysis include the following watersheds: Upper Beaver Creek, Lower Little Pumpkin Creek, Otter

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Creek-Brian, Otter Creek-Horse, Otter Creek-Newell and Powder River-Plum (Chapter 3, Water Quality Section, table titled *Summary of Streams on the 2006 Montana 303(d) List Within or Immediately Adjacent to the District.*). The preferred alternative proposes actions that decrease net risk to water resources in all of these Category 3 watersheds.

The preferred alternative proposes actions that increase net risk to water resources in only three (11%) of the 28 moderate and high risk watersheds on the District, while actions that decrease net risk are proposed in 24 watersheds (86%). Risk remains unchanged in one watershed. None of the watersheds with a net increase are high risk watersheds or have TMDL category 5 streams.

### ***2.7.19 DO NOT DESIGNATE ROUTES WITH INCREASED POTENTIAL TO HARM AMPHIBIANS. DO NOT DESIGNATE ROUTE THAT FOLLOW STREAMS IN HIGH AND MODERATE RISK WATERSHEDS***

The analysis for Alternatives B or B Modified did not indicate a need to further minimize impacts to these species by not designating routes along stream courses. This proposal was not intended to resolve all issues with existing routes, nor was the analyses for aquatics intended to pinpoint what effect specific routes proposed to be added to the system may have on individual species. It was used to indicate if the proposal moved aquatic impacts in a beneficial or adverse direction.

### ***2.7.20 DO NOT DESIGNATE ROUTES, (1) ON GRADES GREATER THAN 15%, (2) LOCATED ABOVE TREE LINE ON HIGHLY EROSION SOILS OR POORLY LOCATED, (3) LOCATED WITHIN 300 FEET OF FISH BEARING STREAMS AND LAKES, (4) HAVE STREAM CROSSINGS WITHOUT BRIDGES, AND ONLY DESIGNATE DISPERSED VEHICLE CAMPING WHERE ON LOW TO MODERATE HAZARD RATING SOILS***

1) Routes on grades greater than 15% does not necessarily indicate there is an issue. Consequently, blanket dismissal of these routes is not warranted or reasonable. The Forest Plan does not preclude construction or designation of routes on grades greater than 15% if the Forest Supervisor approves use of the route. This approval is generally based upon consideration of site specific factors and resources. 2) There are no areas above treeline on the Ashland Ranger District. 3) The data does not indicate an issue with Cow Creek or Otter Creek, and in many cases there is a desire to provide access to lakes or streams, especially those that are stocked for fishing. 4) Bridges are not the only appropriate method for crossing streams. There are a variety of crossing types which can be used to cross streams with low or no impact, depending on environmental and route-specific characteristics. 5) The Forest Service identified the following considerations before proposing to designate dispersed vehicle camping: A) many sensitive areas are not desirable for dispersed vehicle camping (wetlands, grades greater than 5%, etc.); B) the highest use on the District is during the fall, when areas tend to be dry; C) there have not been any specific issues identified during the last 8 years of this activity that indicate the 300 foot allowance has been an issue; D) terrain tends to limit where folks tend to camp; E) typically, heavy use occurs in same location every year and have not been in sensitive areas.

***2.7.21 DESIGNATE ROUTES BASED UPON THE AMOUNT OF MAINTENANCE FUNDING AVAILABLE***

Based on past and projected funding levels, the Forest is unlikely to have sufficient funding to maintain to standard all of the routes necessary for the administration, utilization, and protection of the District for the foreseeable future. Consequently, it is not practical to limit designated routes or the transportation system to only those routes that can be maintained to standard. The Forest prioritizes maintenance work and routinely applies for additional/supplemental funding to increase the number of miles of road and trail maintenance completed. If significant issues arise, road closures are considered to protect resources and/or user safety.

***2.7.22 DO NOT DESIGNATE ROUTES IN OCCUPIED HABITAT FOR GREAT PLAINS TOAD, NORTHERN LEOPARD FROG, AND PLAINS SPADEFOOT***

The analysis in the DEIS for Alternative B did not indicate a need to further minimize impacts to these species, by not designating routes along stream courses. This proposal was not intended to resolve all issues with existing routes, nor was the analyses for aquatics intended to pinpoint what effect specific routes proposed to be added to the system may have on individual species. It was used to indicate if the alternatives moved aquatic impacts in a beneficial or adverse direction.

***2.7.23 CREATE A SEASON OF USE TO REDUCE POTENTIAL IMPACTS WHEN SOILS ARE AT INCREASED RISK OF EROSION***

In compliance with NEPA, the EIS included sufficient analysis of these "other issues", water quality and soils, to substantiate that the proposed actions would not have significant impacts to these resources. This proposal was not intended to resolve all issues with existing routes, nor was the analyses for soils and water quality intended to pinpoint what effect specific routes proposed to be added to the system may have on individual watersheds. It was used to indicate if the proposal moved water quality and soils impacts in a beneficial or adverse direction on a watershed basis. Opportunities to further reduce risks and/or mitigate impacts that are outside the scope of this analysis are identified in Appendix D.

***2.7.24 SITE-SPECIFIC ROUTE ALTERNATIVES***

The public provided a number of comments on the management of specific routes. All of these comments were considered and several were used in developing Alternative B Modified. A number of others were not included in any of the alternatives, and were dropped for varying reasons. Appendix G displays the disposition and rationale for these routes.

**2.8 COMPARISON OF EFFECTS**

Table 2-10 (found at the end of the chapter) provides a summary of the effects of implementing each alternative. Information in Table 2-11 is focused on activities and effects where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

**2.8.1 ROUTE MAINTENANCE NEEDS**

***Introduction***

Commentors indicated concerns that adding system roads and trails could increase the need for maintenance. Commentors also questioned whether converting a road to a trail would mean the route would receive less maintenance. The 2005 Motorized Travel Rule also includes a criterion related to maintenance needs that must be considered. This section is intended to address that criterion by considering the maintenance of motorized routes.

***Regulatory Framework***

Road Maintenance guidelines are prescribed in Forest Service Handbook 7709.59 Road System Operations and Maintenance Handbook and Forest Service Manual 7730 -Road Operation and Maintenance. Trail Maintenance guidelines are prescribed in Forest Service Handbook 2309.18 Trails Management Handbook and Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management, Chapter 2350 – Trail, River, and Similar Recreation Opportunities. The Forest’s road and trail activities are conducted in compliance with these directives.

The Forest is required to maintain National Forest System roads in a condition to safely accommodate intended use in accordance with the maintenance objective for that road. Trail maintenance is intended to preserve the trail and related facilities to meet established objectives for that trail.

***Maintenance Standards***

The Forest Service has established national maintenance standards/criteria for both roads and trails. The standards/criteria establish the corporate level of quality the Forest Service expects to provide. These standards/criteria include key measures related to health; safety; facility conditions; and compliance with laws, regulations, and policies. The trail standards also identify critical standards that if not met would pose “a high probability of immediate or permanent loss to people or property.” Immediate actions must be taken to correct or mitigate the problem if one arises, such as closing the route to the public until the issue is addressed.

Each route is assigned a maintenance level or trail class which reflects the routes operation and maintenance standards/criteria. The higher the maintenance level or trail class number (1-5) the higher the standard of maintenance.

***Maintenance Funding Overview***

Based on past funding levels, the Forest is unlikely to have sufficient funding to maintain to standard all of the routes necessary for the administration, utilization, and protection of the District for the foreseeable future. As a result, the Forest prioritizes maintenance work and routinely applies for additional/supplemental funding to increase the number of miles of road and trail maintenance completed.

Road and trail maintenance funding can only be applied to system roads and trails. Similarly, road funding can only be used for road maintenance, and trail funding can only be used for trail maintenance. Because the District does not currently have any system trails, trail maintenance funds have not been expended on the District in the past. The Forest receives an annual trail maintenance allocation, which would be the source for any trail maintenance conducted on the District, in addition to any supplemental funding (ex: state trails grants) that can be secured.

Maintenance does not occur on every mile of road or trail every year. As mentioned above, maintenance is prioritized across the Forest and accomplished based on the funding received. Over the past 6 years, the Forest annual road maintenance accomplishment ranges any where from 0 to 17% of high clearance vehicle roads (Maintenance Level 2), 3 to 62% of roads suitable for passenger vehicles (Maintenance Level 3) and 0 to 81% of roads having a moderate degree of user comfort (Maintenance Level 4) on the District. The following table displays the miles of road receiving annual maintenance on the District for the past 6 years.

**Table 2-6. Summary of Road Miles Receiving Annual Maintenance<sup>4</sup> by Maintenance Level.**

Ashland District	Fiscal Year (October 1 – September 30)					
	2002	2003	2004	2005	2006	2007
2 - High Clearance Vehicles	17	8	4	2	5	5
3 - Suitable For Passenger Cars	32	67	3	17	16	67
4 - Moderate Degree Of User Comfort	-	1	-	-	-	-

**Evaluation Methodology**

There are many factors to consider when determining maintenance needs such as volume, type, class, and composition of traffic. For this evaluation, the miles of system routes by maintenance level/trail class and route designation was used to determine the relative maintenance needs for each alternative.

**Evaluation of Route Maintenance Needs**

The following table displays the miles of motorized system routes by the proposed road maintenance level/trail class and the proposed route designation for each alternative.

**Table 2-7. Miles of System Routes by Maintenance Level/Trail Class and Route Designation for Each Alternative**

Maintenance Level or Trail Class	Trail Class 2	Road Maintenance Level 1	Road Maintenance Level 2		Road Maintenance Level 3	
		Administrative Use	Open to Public Motorized Use	Administrative Use	Open to Public Motorized Use	Administrative Use
<b>Alternative A</b>	612	28	48	92	90	0
<b>Alternative B</b>	405	28	48	175	90	0
<b>Alternative B Modified</b>	423	28	48	161	90	0
<b>No Action</b>	0	28	586	61	90	0

Routes designated for administrative use would only be used by Forest Service personnel, or by permit holders, contractors, etc., through a written authorization issued under federal law or

<sup>4</sup> Based on data specific to maintenance that were readily available. Totals include maintenance associated with timber harvest contracts, county agreements, and other appropriated forest funds.

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regulation. These routes have extremely low traffic volumes and are controlled by the authorizing permit which in some cases also requires the permittee or contractor to provide route maintenance. For these reasons, route maintenance needs for routes designated for administrative use are typically much less than comparable routes designated for public motorized use.

There are the same miles of Maintenance Level 1 routes in all alternatives. Maintenance Level 1 routes are in storage between intermittent uses. The period of storage exceeds 1 year. Basic custodial maintenance is performed to prevent damage to adjacent resources and to perpetuate the route for future resource management needs. Some degree of road deterioration may occur. These routes are not available for motorized use.

The miles of Maintenance Level 3 routes designated for public motorized use are the same for all alternatives.

In general, Trail Class 2 and Maintenance Level 2 routes have similar maintenance needs based on the roads and trails maintenance handbooks (FSH 7709.59 and FSH 2309.18).

Given the above information, comparison of maintenance needs by alternative will be based on miles of routes available for public motorized use. Miles of administrative use routes is not included because generally these routes require less maintenance and maintenance costs are in some cases offset.

**Table 2-8. Summary of Miles of Maintenance Level 2 and Trail Class 2 System Routes Open to Public Motorized Use for each Alternative.**

Maintenance Level/Class	Trail Class 2	Road Maintenance Level 2	Total
Alternative A	612	48	660
Alternative B	405	48	453
Alternative B Modified	423	48	471
No Action	0	586	586

By combining Trail Class 2 and Maintenance Level 2 routes designated for public motorized use, a comparison of alternatives can be made. As the above table indicates, Alternative A has the most miles designated for public motorized use in this comparison (660 miles) and therefore the most potential maintenance need. The No Action Alternative is the second highest with 586 miles. Alternative B and B Modified would be roughly 30% less of Alternative A and 20% less of No Action Alternative.

## 2.9 MONITORING

Monitoring is one of the cornerstones of contemporary adaptive management. Without monitoring, it is difficult to evaluate whether or not management actions are effective or determine how actions might be modified to improve effectiveness. Monitoring is vital to inform the Forest Service whether or not there is a need to change or make new travel management decisions. Changes to the system of designated routes may include new routes, removing designations, or changing designated vehicle classes or seasons of use. Revisions to designations are governed by 36 CFR 212.54. In most cases, these changes (including connected actions and cumulative effects) can be addressed on a site-specific basis and may not trigger reconsideration of decisions governing the entire system of designated roads, trails and areas on an administrative unit or a ranger district.

Travel management monitoring would help answer questions, such as:

- Are the motorized travel designations having unanticipated impacts, adverse or beneficial, on water quality, soils, fisheries, aquatic species, and vegetation?
- Are the motorized travel designations having impacts, adverse or beneficial, on cultural resources?
- Are the motorized travel designations effective and therefore resulting in the anticipated effects on wildlife and recreation opportunities?

There are two principal sources of new information that the Forest Service will consider in determining if there is a need to modify travel management decisions: 1) monitoring – formal and informal monitoring, including resource specialist’s field observations, and 2) public feedback. Formal and informal monitoring is addressed further below. Public feedback may either be solicited by the Agency or initiated by the public. Public input on the travel management program of work, designations, and route proposals is encouraged and welcomed.

Travel management monitoring will be tiered to Forest Plan monitoring activities. The level and intensity of monitoring will be adapted as needed based on changing needs, findings, and budget levels. The results of monitoring and public feedback will be reviewed annually, at a minimum, during preparation of the MVUM for the subsequent year. If the District Ranger determines that a change to District travel management should be investigated, the process outlined under Forest Service Handbook 1909.15, Chapter 10, Section 18 (40 CFR 1502.9(c)(1)(ii)) will be used to review the new information and determine what type of documentation, if any, or other compliance would be appropriate to address any proposed change.

Travel management monitoring will primarily focus on two types of monitoring activities: implementation monitoring and effectiveness monitoring.

### ***2.9.1 IMPLEMENTATION MONITORING***

This monitoring activity will focus on compliance with Forest Service travel management implementation requirements, namely (1) producing the annual MVUM and (2) installing and maintaining route markers (road and trail numbers) that are consistent with the MVUM.

Monitoring would consist of: (1) reviewing whether or not the annual MVUM was produced and made available to the public in both hardcopy and web-based formats in a timely manner, and (2) reviewing whether or not route signing markers have been installed and are reasonably being maintained, i.e. deferred route marker maintenance is not accumulating.

### ***2.9.2 EFFECTIVENESS MONITORING***

This monitoring activity will focus on evaluating the effectiveness of management and enforcement in achieving the desired outcomes from this decision, especially success at restricting motor vehicle use to designated routes.

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The following table contains the travel management enforcement monitoring measure identified in the Forest Plan, which is anticipated to be a primary source of monitoring information used to determine if there is a need for change in the future.

**Table 2-9. Forest Plan Travel Management Effectiveness Monitoring**

Monitoring Item	Data Source	Monitoring Objective	Variability Which Would Initiate Further Evaluation	Corrective Measures
Off-road-vehicle use and damage and Travel Plan effectiveness. (A-3)	Travel Plan (violation and incident reports, number of variances granted).	To determine compliance with travel plan direction (and, therefore, effectiveness in achieving resource protection objectives). To assist in determination of effectiveness of restriction methods, public understanding of travel plan direction.	Conflicts with Forest Management Area goals.	Review situation for change in implementation techniques such as signing, barriers, public contacts, etc.

Compliance with the National Historic Preservation Act through the Montana Programmatic Agreement (PA) established with the State Historic Preservation Office (SHPO) is required, and includes monitoring of sites for travel management effects. Cultural resource monitoring will be implemented within the Project Area in order to assess the effectiveness of this project relative to the protection and preservation of significant heritage resources. This cultural resource monitoring program is based upon an adaptive management approach that may necessitate specific changes if site disturbances are observed. Should detrimental effects occur, site evaluative testing and formal consultation with the Montana SHPO to identify measures to reduce, remove or mitigate these effects will be necessary. These monitoring results will be presented in the Annual Heritage Reports required by the MT PA.

Additional effectiveness monitoring information is expected to be generated through other ongoing monitoring efforts such as the Forest’s annual weed monitoring program and the periodic Best Management Practices audits.

**2.9.3 MONITORING PLAN**

The District Ranger will develop an implementation and effectiveness monitoring plan within one year of the date of the decision for this project. The monitoring plan will identify monitoring items that are most critical to determining if implementation of the decision is satisfactory and if the decision has been effective. The plan may include criteria similar to the Forest Plan, such as potential data sources/measures, monitoring objectives, thresholds or indicators that change may be needed, and potential corrective measures.

**2.10 FOREST SERVICE PREFERRED ALTERNATIVE**

The Forest Service preferred alternative is Alternative B Modified. Alternative B Modified is the “preferred” alternative based on Responsible Official and interdisciplinary team deliberations. This alternative provides the road system necessary for the administration, utilization, and administration of the District. It also appears to respond best to the significant issue of providing a range of recreation

opportunities, by providing more non-motorized hunting opportunities than Alternative A or the No Action Alternative while still maintaining ample opportunities for motorized recreation. Alternative B Modified responds to public comments on the DEIS better than Alternative B by designating some additional key motorized routes and designating a season of use on some additional routes for non-motorized hunting opportunities. Environmental impacts would generally be reduced under Alternative B Modified when compared to Alternative A and the No Action Alternative.

The Responsible Official (the Custer Forest Supervisor) may select any combination of travel management actions as presented and analyzed within this document.

**Table 2-10. Comparison of Effects by Alternative**

Feature	Alternative A	Alternative B	Alternative B Modified	No Action Alternative
<b>Recreation</b>				
<b>Motorized Recreation Opportunity</b>				
Acres of Roaded Natural ROS (During SOU <sup>5</sup> /Outside SOU)	114,108/NA <sup>6</sup>	114,027/ 114,027	114,004/ 114,004	116,928/NA
Acres of Semi-Primitive Motorized ROS (During SOU/Outside SOU)	320,418/NA	292,260/ 281,485	296,192/ 279,049	337,798/NA
Miles of motorized roads and trails (During SOU/Outside SOU)	750/NA	543/525	561/534	676/NA
<b>Non-Motorized Recreation Opportunity</b>				
Acres of Semi-Primitive Non-Motorized ROS (During SOU/Outside SOU)	67,734/NA	95,972/ 106,746	92,063/ 109,206	47,533/NA
<b>Opportunity for Off-Highway Vehicle Operation</b>				
Miles of Mixed Use System Roads (During SOU/Outside SOU)	37/NA	37/37	37/37	0
Miles of Motorized System Trails-All Motor Vehicles (During SOU/Outside SOU)	612/NA	405/387	406/379	0
Miles of Motorized System Trails-Vehicles 50” or Less in Width (During SOU/Outside SOU)	0/NA	0/0	17/17	0
Total Miles available for Off-Highway Vehicle Operation (During SOU/Outside SOU)	649/NA	442/424	460/433	0
<b>Cultural Resources</b>				
Total Number of Cultural Resources within the Area of Potential Effect (APE)	513	440	443	494
Number of Priority Asset Sites within the APE	46	45	45	46
Number of Culturally Sensitive Sites within the APE	42	35	35	39
<b>Wildlife</b>				
<b>Threatened or Endangered Wildlife Species</b>				
Number of species with No Jeopardy	1	1	1	1
Number of species with potential to effect, but not likely to adversely affect.	1	1	1	1
Number of species with potential to effect, and likely to adversely affect	0	0	0	0
<b>Sensitive Wildlife Species</b>				
Number of Species with Beneficial Impact	0	0	0	0
Number of Species with No Impact	13	13	13	13
Number of Species with potential to effect individuals or Habitat but will not Likely Contribute to a trend towards Federal Listing or Loss of Viability to the Population or Species	9	9	9	9
Number of Species likely to result in a trend to Federal listing or loss of viability	0	0	0	0
<b>Management Indicator Species</b>				
Number of Species with Positive Effects	0	0	0	0
Number of Species with Neutral Effects	16	16	16	16
Number of Species with Negative Effects	0	0	0	0

<sup>5</sup> SOU = Season of Use

<sup>6</sup> NA = Not Applicable

**Table 2-10. Comparison of Effects by Alternative**

Feature	Alternative A	Alternative B	Alternative B Modified	No Action Alternative
<b>Elk</b>				
Motorized Route Density (miles per square mile) (SOU/Non-SOU)	1.09/NA	0.83/0.80	0.85/0.82	1.00/NA
Percent secure habitat within elk habitat	28.33/NA	36.25/37.69	35.53/37.50	24.90/NA
<b>General Wildlife</b>				
Percent of Land Unit that is core wildlife habitat (based on motorized routes)	22%	28%	28%	18%
<b>Water Quality, Fisheries, and Aquatics</b>				
Net Increase or Decrease in Risk Compared to No Action (Percent)	+8	-20	-19	0
Net Increase or Decrease in Risk Compared to Existing Condition (Percent)	-12	-37	-36	-18
<b>Sensitive Fish and Amphibian Species</b>				
Number of Species with No Impact or Beneficial Impacts	3	5	5	3
Number of Species with potential to effect individuals or Habitat but will not Likely Contribute to a trend towards Federal Listing or Loss of Viability to the Population or Species	2	0	0	2
Number of Species likely to result in a trend to Federal listing or loss of viability	0	0	0	0
<b>Recreational Fish Species and Rare Macroinvertebrates</b>				
Alternatives with No Impact or Beneficial Impact	No	Yes	Yes	No
Alternatives with potential to effect individuals or Habitat but will not Likely Contribute to a Loss of Viability to the Population or Species	Yes	No	No	Yes
<b>Soils</b>				
<b>Severe Erosion Hazard Rating</b>				
Miles of Motorized Routes designated for public use	484	338	355	428
<b>Moderate Erosion Hazard Rating</b>				
Miles of Motorized Routes designated for public use.	252	196	205	239
<b>Vegetation</b>				
<b>Moderate Risk Areas – Motorized Routes</b>				
Acres Potential Frequent Use Areas (% of Project Area)	20 (Trace)	10 (Trace)	10 (Trace)	20 (Trace)
Acres Potential Infrequent Use Areas (% of Project Area)	773 (Trace)	403 (Trace)	415 (Trace)	686 (Trace)
Miles in Moderate Risk Area	9	4	4	8
<b>Weeds Susceptibility</b>				
Weed Susceptible Acres within designated road corridor	62,717	46,665	48,138	57,606
<b>Weed Infestation</b>				
Total Infested Acres within Motorized Route potentially affected corridor	1869	1646	1650	1811
<b>Sensitive Plants</b>				
Number of Species with No Impact	2	2	2	2
Number of Species with potential to effect individuals or Habitat but will not Likely Contribute to a trend towards Federal Listing or Loss of Viability to the Population or Species	1	1	1	1
Number of Species likely to result in a trend to Federal listing or loss of viability	0	0	0	0

**Table 2-11. Summary of Changes in Effects Compared to the No Action Alternative**

Feature	Alternative A	Alternative B	Alternative B Modified
<b>Recreation</b>			
<b>Motorized Recreation Opportunity</b>			
Acres of Roded Natural ROS (During SOU <sup>7</sup> /Outside SOU)	Reduced by 2,820 acres/ NA	Reduced by 2,901 acres/ Reduced by 2,901 acres	Reduced by 2,924 acres/ Reduced by 2,924 acres
Acres of Semi-Primitive Motorized ROS (During SOU/Outside SOU)	Reduced by 17,380 acres/ NA	Reduced by 45,538 acres/ Reduced by 56,313 acres	Reduced by 41,606 acres/ Reduced by 58,749 acres
Miles of motorized roads and trails (During SOU/Outside SOU)	Increased by 74 miles/ Increased by 74 miles	Reduced by 133 miles/ Reduced by 151 miles	Reduced by 115 miles/ Reduced by 142 miles
<b>Non-Motorized Recreation Opportunity</b>			
Acres of Semi-Primitive Non-Motorized ROS (During SOU/Outside SOU)	Increased by 20,201/ NA	Increased by 48,439/ Increased by 59,213 acres	Increased by 44,530/ Increased by 61,673 acres
<b>Opportunity for Off-Highway Vehicle Operation</b>			
Miles of Mixed Use System Roads	Increased by 37 miles	Increased by 37 miles	Increased by 37 miles
Miles of Motorized System Trails All Motor Vehicles	Increased by 612 miles	Increased by 405 miles	Increased by 406 miles
Miles of Motorized System Trails Vehicles 50" or Less in Width	No change	No change	Increase of 17 miles
Total Miles available for Off-Highway Vehicle Operation	Increased by 649 miles	Increased by 442 miles	Increased by 460 miles
<b>Cultural Resources</b>			
Total Number of Cultural Resources within the APE	Increase of 19 sites	Decrease of 54 sites	Decrease of 51 sites
Number of Priority Asset Sites within the APE	No change	Decrease of 1 site	Decrease of 1 site
Number of Culturally Sensitive Sites within the APE	Increase of 3 sites	Decrease of 4 sites	Decrease of 4 sites
<b>Wildlife</b>			
<b>Threatened or Endangered Wildlife Species</b>			
Number of species with No Jeopardy	No change; no species jeopardized		
Number of species with potential to effect, but not likely to adversely affect.	No change; Actions are not likely to adversely affect the single species analyzed		
<b>Sensitive Wildlife Species</b>			
Change from the No Action Alternative	No Change; Actions are not likely to result in a trend to Federal listing or loss of viability		
<b>Management Indicator Species</b>			
Change from the No Action Alternative	No Change; Actions are not likely to negatively effect species		
<b>Deer &amp; Elk</b>			
Motorized Route Density in miles per square mile (SOU/Non-SOU)	Density increase by .09/NA	Density decreases by .17 / Density decreases by .20	Density decreases by .15 / Density decreases by .18
Percent secure habitat within elk habitat (SOU/Non-SOU)	Increase of 3% / Increase of 3%	Increase of 11% / Increase of 13%	Increase of 11% / Increase of 13%

<sup>7</sup> SOU = Season of Use

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<b>General Wildlife</b>			
Percent of District that is core wildlife habitat (based on motorized routes)	Increase of 4%	Increase of 10%	Increase of 10%
<b>Water Quality, Fisheries, and Aquatics</b>			
<b>Water Quality</b>			
Miles of actions that reduce risks on routes within the project area	66 miles of actions reducing risks	183 miles of actions reducing risks	187 miles of actions reducing risks
Miles of actions that increase risks on routes within the project area	125 miles of actions increasing risks	55 miles of actions increasing risks	62 miles of actions increasing risks
<b>Sensitive Aquatic Species</b>			
Change from No Action Alternative	No change	Changes two species from May Impact to No Impact	Changes two species from May Impact to No Impact
<b>Recreational Fish Species and Rare Macroinvertebrates</b>			
Change from No Action Alternative	No change	Changes species from May Impact to No Impact	Changes species from May Impact to No Impact
<b>Soils</b>			
<b>Severe Erosion Hazard Rating</b>			
Miles of Motorized Routes designated for public use	Increase of 56 miles	Decrease of 90 miles	Decrease of 73 miles
<b>Moderate Erosion Hazard Rating</b>			
Miles of Motorized Routes designated for public use.	Increase of 13 miles	Decrease of 43 miles	Decrease of 34 miles
<b>Vegetation</b>			
<b>Moderate Risk Areas - Motorized Routes</b>			
Acres Potential Frequent Use Areas	No Change	Decrease of 10 acres	Decrease of 10 acres
Acres Potential Infrequent Use Areas	Increase of 87 acres	Decrease of 283 acres	Decrease of 271 acres
Miles in Moderate Risk Area	Increase of 1 miles	Decrease of 4 miles	Decrease of 4 miles
<b>Weeds Susceptibility</b>			
Weed Susceptible Acres within designated road corridor	Increase of 5111 acres	Decrease of 10,941 acres	Decrease of 9,468 acres
<b>Weed Infestation</b>			
Total Infested Acres within Motorized Route potentially affected corridor	58 additional acres	165 fewer acres	161 fewer acres
<b>Sensitive Plants</b>			
Change from No Action Alternative	No change; Actions are not likely to result in a trend to Federal listing or loss of viability		

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**- End of Chapter 2 -**