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Travel Management Rule Implementation

Willamette National Forest

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TRAVEL MANAGEMENT RULE IMPLEMENTATION

ENVIRONMENTAL ASSESSMENT

LEAD AGENCY: USDA FOREST SERVICE

RESPONSIBLE OFFICIAL: FOREST SUPERVISOR

FOR MORE INFORMATION CONTACT:

Ryan Brown
(541) 782-5211
rnbrown@fs.fed.us

ABSTRACT

In accordance with the 2005 Travel Management Rule, the Willamette National Forest proposes to prohibit motor vehicle travel **off** of a designated system of roads and trails. The Proposed Action identifies an exception to this prohibition by allowing the designation of access zones in appropriate areas, to permit motorized access along existing routes to existing dispersed camping sites. Implementation of the Travel Management Rule will apply programmatically to all lands in the Willamette National Forest; future changes would occur on a site specific level generally through local District project planning.

The Proposed Action would non-significantly amend the Willamette National Forest Land and Resource Management Plan to allow motor vehicle use only on a designated system of roads and trails and on existing routes in designated access zones for dispersed camping. This may diminish the opportunity for motor vehicle travel on the Willamette National Forest, though this reduction in opportunity will be slight due to existing patterns of use which closely mirror the changes proposed here. Allowing motor vehicle use only on a designated system of roads and trails is also expected to reduce motor vehicle impacts to wildlife, aquatic resources, soils, sensitive plants, heritage resource, and the spread of noxious weeds because motor vehicles would be able to travel fewer

places, particularly with regards to off-road travel. Again, the magnitude of these benefits will be small due to the existing use patterns closely resembling the changes to the Forest Plan identified here.

The Purpose and Need for this project is to provide a motor vehicle transportation system consistent with the management direction of the Willamette National Forest Land and Resource Management Plan (Forest Plan) that fulfills the requirements of the Rule and provides opportunities for motorized access to dispersed camping opportunities.

In addition to the Proposed Action (Alternative 2), the Forest Service also evaluated the following alternatives:

Alternative 1 - No Action: Under the No Action alternative, the Forest Service would not amend the Forest Plan to prohibit wheeled motorized travel off of the designated system of roads and trails. The Forest Plan would be in conflict with the implementation of the 2005 Travel Management Rule and would allow unmanaged motor vehicle use to continue on the Willamette National Forest. Motorized access to dispersed campsites would remain unmanaged.

Alternatives Developed but not Analyzed in Detail:

- Within riparian areas, restrict motorized travel to dispersed sites to designated system of roads and trails. This alternative was not fully developed because it does not fully meet the Purpose and Need for action, which is to continue to provide motorized access to dispersed camping opportunities.
- Using road density standards, create a minimum transportation system that is streamlined, non-redundant and efficient. This alternative was not fully developed because it is outside the scope of the Purpose and Need.
- Designate a travel system that retains natural quiet in important landscapes, watersheds and soundscapes. This alternative was not fully developed because it is outside the scope of the Purpose and Need.
- Create a transportation system that minimizes impacts to the values of Inventoried Roadless Areas. This alternative was not fully developed because it is outside the scope of the Purpose and Need.

The Forest Supervisor, as deciding official, will review the analysis of the Proposed Action to decide which routes should be designated for motorized use and the appropriate method for providing motorized access to dispersed camping.

CONTENTS

1. Introduction	1
Document Structure	1
Background	2
Planning Area Location and Environmental Setting	3
Purpose and Need	3
Proposed Action	4
Decision to be made	5
Applicable Laws, Regulations, Planning Documents and Analyses	6
Scoping	7
Issues	7
Issues that did not Drive Alternatives	7
Project Implementation	8
2. Comparison of Alternatives, Including the Proposed Action	12
Introduction	12
Alternatives Considered but Eliminated from Detailed Study	12
Alternative 1: No Action	14
Alternative 2: Proposed Action	14
Comparison of Alternatives	23
3. Affected Environment and Environmental Effects	26
Introduction	26
Motorized Recreation	27
Non-motorized Recreation	37
Law Enforcement	39
Wildlife	40
Sensitive Plants	46
Noxious Weeds	47
Aquatic Resources (Soil Conditions, Water Quality and Fish)	48
Heritage Resources	52
Other Topics	56
4. Consultation with Others	61
Introduction	61
Interdisciplinary Team	61
Agency Consultation	62
Tribes	62
Public Involvement	63
References Cited	64

List of Appendices:

Appendix A: Glossary of Terms	66
Appendix B: Public Comments and Analysis	69
Table 1: Non-significant Issues Addressed in Travel Management EA	69
Table 2: Public Scoping Comments Key	75
Table 3: Public Scoping Comments Received and Forest Service Response	78
Appendix C: Travel Management Maps	112
Figure 1: Detroit Ranger District	
Figure 2: Sweet Home Ranger District	
Figure 3: McKenzie River Ranger District; McKenzie Area	
Figure 4: McKenzie River Ranger District; Blue River Area	
Figure 5: Middle Fork Ranger District; Lowell Area	
Figure 6: Middle Fork Ranger District; Oakridge Area	
Figure 7: Middle Fork Ranger District; Rigdon Area	

List of Tables:

1. Willamette National Forest LRMP Management Areas: Existing Condition and Proposed Action for Cross-Country Motorized Travel	15
2. Changes in Verbiage to the Forest Plan by Citation	17
3. Comparison of No Action Alternative and Proposed Action	23
4. Miles of Forest Service System Roads by Operational Maintenance Level	29
5. Density of Dispersed Campsites per Willamette National Forest Acre	31
6. Travel Management Interdisciplinary Team	45

List of Figures:

1. Example Motor Vehicle Use Map Display	10
2. Forage Meadow Damaged by Off-highway Vehicle Use	45

CHAPTER 1

INTRODUCTION

DOCUMENT STRUCTURE

The Forest Service has prepared this Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) and other relevant federal and state laws and regulations. This Environmental Assessment discloses the direct, indirect and cumulative environmental impacts that would result from the Proposed Action and alternatives. The document is organized into four parts:

- ***Introduction:*** The section includes information on the history of the project proposal, the Purpose of and Need for the project, and the agency's proposal for achieving that Purpose and Need. This section also details how the Forest Service informed the public of the proposal and how the public responded.
- ***Comparison of Alternatives, including the Proposed Action:*** This section provides a more detailed description of the agency's Proposed Action and the No Action alternatives. This chapter discusses alternatives that were developed in response to public comments, but were not analyzed in detail because they did not meet the Purpose and Need for action. Additional alternatives are not discussed, as no significant issues were raised by the public or other agencies to drive the full development and analysis of additional alternatives. Finally, this section provides a summary table of the environmental consequences associated with each alternative analyzed.
- ***Environmental Consequences:*** This section describes the environmental effects of implementing the Proposed Action and No Action alternatives. This analysis is organized by resource component. Within each section, the affected environment is described first, followed by the effects of the No Action alternative that provides a baseline for evaluation and comparison of the Proposed Action.
- ***Agencies and Persons Consulted:*** This section provides a description of organizations, individuals and agencies consulted during the development of the environmental assessment.
- ***Appendices:*** The appendices provide more detailed information to support the analyses presented in the environmental assessment, including a glossary of terms used throughout this document, a content analysis and the original content of public comments, and the Proposed Action maps.
- Additional documentation, including more detailed analyses of project-area resources, may be found in the project planning record located at the Forest Supervisor's Office in Springfield, Oregon.

BACKGROUND

Travel Management Rule: Designated Routes and Areas for Motor Vehicle Use Federal Register Vol. 70, No 216, 2005 (FR) (Rule)

Chief Bosworth identified unmanaged recreation as one of the four threats to National Forest Lands. In 2005, the Forest Service published a new rule to serve as a consistent national framework for motor vehicle use on national forests and grasslands. The final rule revises regulations 36 CFR 212, 251, 261, and 295 to require each national forest to designate roads, trails and areas, where appropriate, as open to motor vehicle use by class of vehicle and time of year. These designations must be clearly displayed on a Motor Vehicle Use Map (MVUM), and may be updated yearly to reflect changes to the designated system.

The Rule states clear identification of roads and trails for motor vehicle use on each NF will:

- Enhance management of NFS lands;
- Sustain natural resource values through more effective management of motor vehicle use;
- Enhance opportunities for motorized recreation experiences on NF system lands
- Address needs for access to NFS lands
- Preserve areas of opportunity for non-motorized travel and experiences

Current Management Direction; Willamette National Forest LRMP

Forest Roads. The Willamette National Forest Land and Resource Management Plan (Forest Plan) identifies the purpose of the transportation system. (LRMP p. IV-32) Roads are designed to different standards, depending upon the type of use they are intended for. Objective Maintenance Levels indicate the appropriate maintenance condition for each road. Operational Maintenance Levels reflect the actual maintenance condition of each road. (LRMP p. IV-93, FW-310, 311) The Forest Plan also allows for roads to be closed for specific resource needs (wildlife, aquatics, heritage, etc), visitor conflicts, public safety, lack of need, or to reduce road damage and maintenance costs. (LRMP p. IV-93, FW-312)

Off-Road Vehicle Recreation. The Forest Plan provides for a diversity of off-road vehicle recreation opportunities to be provided across the Forest where consistent with the criteria specified in FSM 2355.12. These criteria include:

- The use is compatible with established land management and resource objectives.
- The use is consistent with the capability and suitability of the resources.
- There is a demonstrated demand which cannot be better satisfied elsewhere (LRMP p. IV-50, FW-024)

PLANNING AREA LOCATION AND ENVIRONMENTAL SETTING

The project area applies to the entire Willamette National Forest, including the Detroit, Sweet Home, McKenzie River and Middle Fork Ranger Districts, located in the state of Oregon in portions of Lane, Linn, Marion and Clackamas Counties. The project area includes the transportation system of motorized roads and trails, dispersed camping areas, and the general forest area.

PURPOSE AND NEED

The Purpose and Need for this project is to provide a motor vehicle transportation system consistent with the management direction of the Willamette National Forest Land and Resource Management Plan (Forest Plan) that fulfills the requirements of the Travel Management Rule and provides opportunities for motorized access to dispersed camping opportunities. The resulting transportation system will offer a variety of recreation opportunities, prohibit motorized use off of designated routes, balance management considerations with recreation opportunities and commercial uses, reduce impacts to forest resources, and recognize reserved or outstanding rights.

Meet National Direction: The intent of the Travel Management Rule is to reduce and prevent adverse resource impacts caused by unmanaged motorized use in order to maintain and protect the health of ecosystems and watersheds. While the final Rule recognizes “motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests in the right places, and with proper management (FR p. 68264),” it also recognizes that unmanaged motorized use can result in negative impacts to natural resources and the experiences of other forest visitors. The Rule therefore integrated the requirement to designate a system of routes to establish a sustainable balance between providing access for motorized use and protecting resources from impacts related to unregulated motorized use.

The Willamette National Forest is required to meet national direction as published in the Federal Register, 36 CFR Parts 212, 251, 261, 295. The 2005 Travel Management Rule requires each Forest to designate a travel system to be open to motor vehicle use by vehicle class and time of year. The Rule prohibits the use of motor vehicles off of a designated system with some exceptions. A complete list of exceptions is listed in Chapter 2, Table 2 on page 17.

The Rule requires the Willamette National Forest to publish a Motor Vehicle Use Map (MVUM) displaying a designated system of routes, including travel restrictions and exceptions. Following the publication of this map, motor vehicle use occurring outside of the designated system will be prohibited.

Continue to Provide Motorized Access to Dispersed Camping Opportunities in a Manner that Protects Resources: Dispersed campsites are found along every major river corridor and along many upland roads throughout the Willamette National Forest. Visitors access these sites through the use of system roads, non-system routes, by pulling to the side of a system road, and by walking in. The distribution and concentration of

these campsites, as well as the types of management in place to protect resources varies by geographic area across the Forest.

The Willamette National Forest needs to provide for continued public motorized access to dispersed (informal) camping opportunities in a manner which protects sensitive resources from impacts associated with unmanaged motorized use.

Non-significantly Amend the Willamette National Forest Land and Resource Management Plan (Forest Plan) to make it consistent with the Travel Management

Rule: Cross-country motor vehicle travel is not a common activity on the Willamette National Forest, as it is limited by steep terrain and dense vegetation. Any motor vehicle activity directly causing impacts to natural vegetation, soils, water or cultural sites is prohibited by law. Current direction in the Forest Plan allows cross-country motorized travel on approximately 60% of the land base. (LRMP p. IV-21)

This non-significant amendment would change direction for Management Areas from “motorized cross-country use open, unless designated as closed,” to “motorized cross-country use closed, unless designated as open.” See Table 1 on page 15 for a description of the existing condition and proposed action regarding cross-country motorized travel in the Forest Plan.

The Travel Management Rule requires all motor vehicle use off of a designated system of routes (cross-country travel) to be prohibited. This requires a programmatic¹ approach to amend the Forest Plan to provide consistency with the implementation of the Rule through the Motor Vehicle Use Map (MVUM). The MVUM is the tool for enforcing the Rule and will display all roads and trails designated as open to wheeled motorized use.

PROPOSED ACTION

In accordance with the 2005 Travel Management Rule,² the Willamette National Forest proposes to non-significantly amend the Land and Resource Management Plan to prohibit motor vehicle³ travel **off**⁴ of a designated⁵ system of roads⁶ and trails.⁷ The Proposed

¹ A programmatic analysis is required by the National Environmental Policy Act (NEPA) when proposing changes in land management strategy that will apply to multiple or large areas. In this case, NEPA requires a programmatic approach to make a change to the Forest Plan, which effects the management situation on the entire Forest.

² The term “2005 Travel Management Rule” or hereafter, “the Rule” refers to the Final Rule entitled “Travel management; Designated routes and Areas for Motor Vehicle use” published in the Federal Register, Volume 70, Number 216, Wednesday, November 9th, 2005. The 2005 Travel Management Rule revised Forest Service regulations regarding travel management on National Forest System lands in the Code of Federal Regulations, Title 36, parts 212, 251, 261, and 295.

³ A “motor vehicle” is defined as: Any vehicle which is self-propelled, other than: (1) A vehicle operated on rails (over-snow vehicles); and (2) Any wheelchair or mobility device, including one that is battery powered, that is designed solely for use by a mobility-impaired person for locomotion, and that is suitable for use in an indoor pedestrian area. (USDA Forest Service, 2005)

⁴ Off of the existing road surface or established path of the trail, in other words “cross-country”

⁵ A “designated” road, trail, or area is defined as: A National Forest System road, a National Forest System trail, or an area on National Forest System lands that is designated for motor vehicle use pursuant to Sec. 212.51 on a motor vehicle use map. (USDA Forest Service, 2005)

Action identifies an exception to this prohibition by allowing the designation of access zones in appropriate areas, to permit motorized access along existing routes to existing dispersed camping sites (see 2. below). Implementation of the Travel Management Rule will apply programmatically to all lands in the Willamette National Forest.

In accordance with provisions of the Travel Management Rule, and with the objective of minimizing resource damage associated with motorized travel off of designated routes, the Proposed Action would:

1. Non-significantly amend the Willamette National Forest Land and Resource Management Plan (Forest Plan) to prohibit motorized travel **off** of a designated system of travel routes in all Management Areas.
2. Include a programmatic exception to provide for continued motorized access to existing dispersed campsites in appropriate Forest Plan Management Areas. This exception would allow for the application of designated access zones where appropriate to meet the Purpose and Need of continuing to provide motorized access to dispersed camping opportunities. Within designated access zones, travel off of the designated system of roads and trails displayed on the MVUM would be allowed for the purpose of accessing dispersed camping opportunities. Additional information regarding access zones can be found on page 21-22 of this document.

DECISION TO BE MADE

The Responsible Official for this proposal is the Willamette National Forest Supervisor. After completion of the EA, there will be a 30-day public comment period. Based on the response to this EA and the analysis disclosed in the EA, the Responsible Official will make a decision and document it in a Decision Notice. The Responsible Official can decide to:

- Select the Proposed Action and non-significantly amend the Forest Plan, or
- Select the No Action alternative, or
- Modify the Proposed Action and amend the Forest Plan, and
- Identify what mitigation measures will apply

The scope of this project and the decisions to be made are limited to how the Forest Plan should be amended to limit motorized use to a designated system of roads and trails, and the appropriate method for providing excepted motorized access to existing dispersed camping opportunities. This project is programmatic in nature and does not propose site-specific modifications. It is not within the scope of this analysis to determine whether dispersed sites should remain or be eliminated.

⁶ A “road” is defined as: A motor vehicle route over 50 inches wide, unless identified and managed as a trail. (USDA Forest Service, 2005)

⁷ A “trail” is defined as: A route 50 inches or less in width or a route over 50 inches wide that is identified and managed as a trail. (USDA Forest Service, 2005)

APPLICABLE LAWS, REGULATIONS, PLANNING DOCUMENTS AND ANALYSES

Laws, Regulations and Initiatives:

Development of this EA follows implementation regulations of the Forest and Rangeland Renewable Resources Planning Act of 1974; Title 36, Code of Federal Regulations, Part 219 (36 CFR219); Council of Environmental Quality, Title 40; CFR, Parts 1500-1508, National Environmental Policy Act (NEPA).

Many federal and state laws, including the National Forest Management Act (NFMA), Endangered Species Act, Clean Air Act, and Clean Water Act also guide this analysis. Compliance with specific laws and regulations are cited in the text of this document. The Travel Management Rule; Designated Routes and Areas for Motor Vehicle Use (Federal Register, Volume 70, Number 216, Wednesday, November 9th 2005; Title 36, Code of Federal Regulations, Parts 212, 251, 261, and 295) requires each National Forest and Grasslands to designate all roads, trails and areas that are open to motor vehicle use and to display these designations on a Motor Vehicle Use Map. This analysis is required to implement this rule.

Executive Orders 11644 and 11989 require the Forest Service to provide a variety of recreation opportunities for the visiting public and to protect resources from damage occurring from motorized use. These Orders are the basis for the 2005 Travel Management Rule.

Tiered Environmental Impact Statements:

This EA is tiered to the Final Environmental Impact Statement (FEIS) for the Land and Resource Management Plan – Willamette National Forest (USDA, 1990), as amended by the Final Supplemental Environmental Impact Statement on the Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl (USDA, USDI 1994) and applicable analyses from subsequent Forest Plan amendments.

Plans and Local Assessments:

The Willamette Forest Road Analysis (USDA, 2003) provides the Responsible Official with the programmatic guidance needed to identify and manage a minimum road system that is safe and responsive to public needs and desires, is affordable and efficient, has minimal adverse effects on ecological processes and ecological health, diversity, and productivity of the land, and is in balance with available funding for needed management actions. District Road Analyses evaluate individual road segments with criteria relating to terrestrial, aquatic, administrative, and public use factors. These documents are not decision documents; rather they provide programmatic guidance to decision makers to be used when planning site-specific projects involving the road system.

The Willamette National Forest Road Analysis Report and District-specific supplemental road analyses do not directly influence this EA. They are utilized in project-specific planning to create an improved transportation system. Over time, the Roads Analysis will be implemented through site-specific projects (recent examples of site-specific

planning projects include: “Hehe Late-Successional Reserve Thin Project” and Oakridge-Westfir Thinning and Fuel Reduction Project”). These changes will be reflected on the MVUM as they occur.

SCOPING AND TRIBAL CONSULTATION

Beginning in 2007, scoping for this project was conducted by the Forest in several phases. A summary of these efforts is listed in Chapter 4.

Tribal Consultation:

Consultation with Klamath Tribes, Confederated Tribes of the Grand Ronde, Confederated Tribes of the Siletz Indians, and Confederated Tribes of Warm Springs regarding Travel Management began in February of 2008. On March 6, 2009 a draft of the consultation letter for the Travel Management Proposed Action was sent to these tribes for input. In addition, meetings to explain the proposal were held with tribal representatives in 2008 and 2009. No additional comments were received from the tribes in response to the consultation letter.

Scoping:

For all other interested parties, a scoping letter was sent out to the Travel Management mailing list (over 450 addresses) on March 16, 2009. Eighty-five responses were received in response to this scoping letter. Presentations were also made to two local groups that expressed interest in the Travel Management Proposed Action: Capitol Chapter (4/16/09) and the Emerald Chapter (5/11/09) of the Oregon Hunter’s Association. The proposal has been listed in the Schedule of Proposed Actions (SOPA) since October 1, 2007. The Willamette National Forest published the SOPA quarterly on the web and sends the document to over 50 individuals, groups and industry representatives.

ISSUES

The Council for Environmental Quality (CEQ) NEPA regulations require this delineation in Sec. 1501.7, “...identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)...” Public comments were examined for significant issues.

Significant issues: None of the issues generated through public scoping identified important adverse effects directly or indirectly caused by implementing the Proposed Action. In other words, no significant issues were identified that would drive the creation of an additional alternative.

ISSUES THAT DID NOT DRIVE ALTERNATIVES

Non-significant issues: Several issues need to be addressed or analyzed in the EA. These are listed below. Non-significant issues are determined to be: 1) Outside the scope of the Purpose and Need; 2) Already decided by law, regulation, Forest Plan, or other higher level decision; 3) Irrelevant to the decision to be made; or 4) Conjectural and not supported by scientific or factual evidence.

The following non-significant issues were raised by members of the public, and will therefore be addressed in this Environmental Assessment.

- Adequacy of trail system to provide for motorized recreation demand
- Potential for resource impacts in dispersed camping designated access zones, especially in sensitive areas
- Adequacy of access to motorized dispersed camping opportunities
- Compatibility of Proposed Action with the 1866 Mineral Estate Trust Grant Act and RS 2477
- Adequate protection of natural quiet, sufficient opportunities for non-motorized recreation, and further reduction of user conflicts
- Compatibility of the Proposed Action with Executive Orders 11644 and 11989
- Compatibility of Proposed Action with National Historic Preservation Act requirements to consider visual and auditory effects to cultural resources
- Designation of routes for motorized use that overlap historical linear features
- Costs associated with the implementation of each alternative
- Systematic designation of a minimum transportation system for motor vehicles and OHVs to protect all natural and cultural resources
- Disturbance of important habitat associated with OHV trail designation and the need to coordinate with Oregon Department of Fish and Wildlife
- Motorized access for game retrieval on Maintenance Level 1 roads and cross-country
- Public access on Operational Maintenance Level 1 roads
- Motorized access for people with disabilities

Please see Appendix B, Table 1 (Non-significant Issues Addressed in Travel Management EA) for more information regarding the non-significant issues generated during the scoping period that are addressed in this EA. To see the full list of comments received through the scoping process, please see Appendix B, Tables 2 and 3.

PROJECT IMPLEMENTATION

The Willamette National Forest will implement the Proposed Action through a process that minimizes cost, efficiently informs the public of changes to the MVUM, and supports the public in understanding the new system on the ground. After the release of the Decision Notice, this project would be implemented with the publication of the Motor Vehicle Use Map in November of 2009. This map would serve as the enforcement tool, with a CFR identifying the legal use of the designated system for law enforcement officers and the public.

By January of 2010, paper copies of the map would be available to the public at district offices and the supervisor's office, free of charge. The map would also be published on the Willamette National Forest website. Each person driving a motor vehicle should carry a map to let them know where they can legally drive on the Forest. It is estimated that the initial printing of MVUM would cost approximately \$15,000-\$20,000. Because the Willamette National Forest is only proposing to designate trails for motorized use that are currently managed for this purpose, no increase in trail maintenance costs are expected.

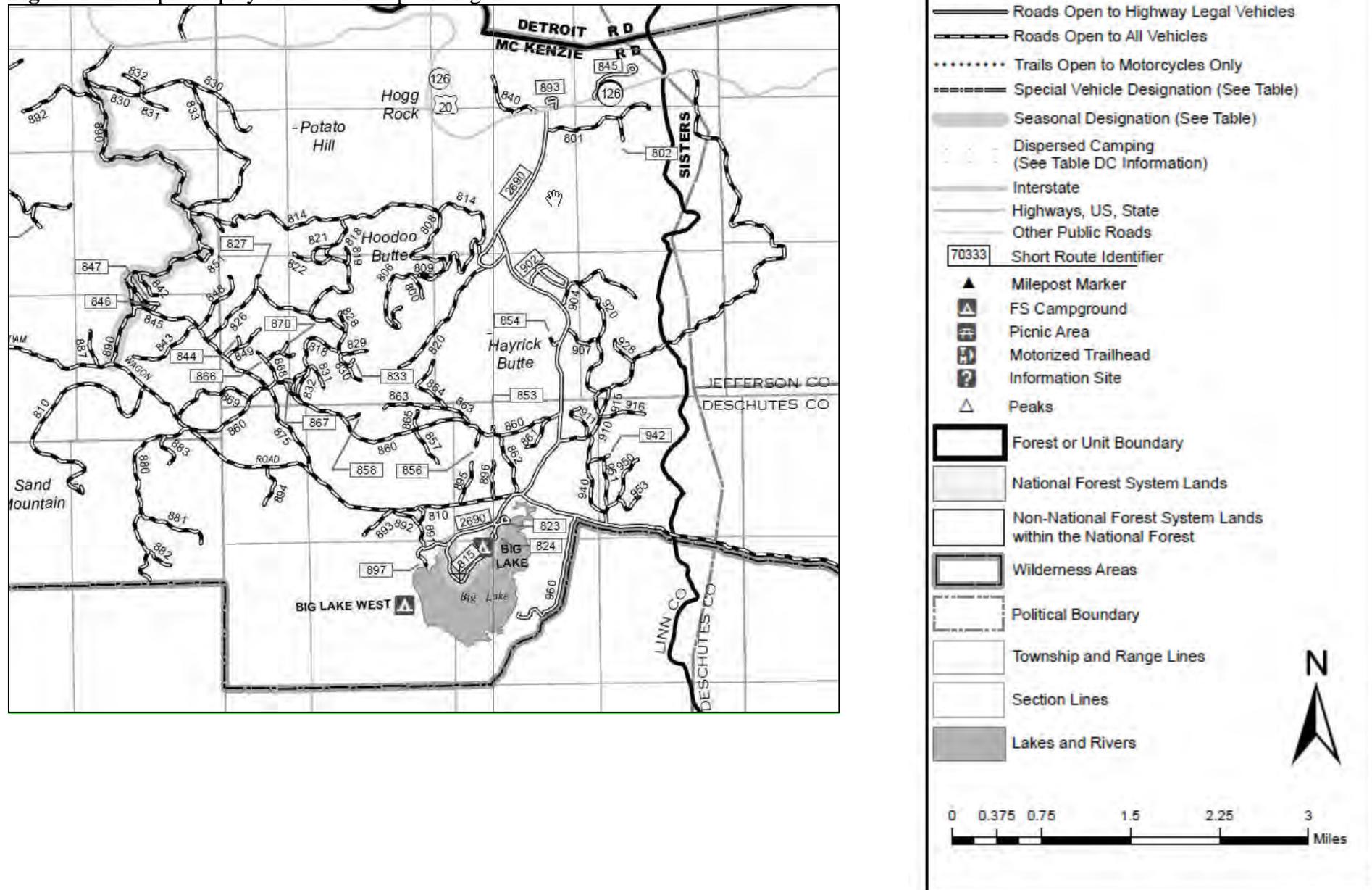
The Willamette National Forest would focus on public education for the first two years of implementation. This will allow members of the visiting public to become familiar with the new system, and for corrections to be made in the database. Citations would only be issued for violations of the new rules resulting in damage to resources or social disruption, such as mudding, destruction of vegetation, and off-road travel near private land. Education would include updated information on the WNF website and the installation of information kiosks displaying the MVUM and providing guidance on how to use it.

Forest Service personnel would track the effectiveness of implementing the new Rule by recording the number of Forest visitors carrying the MVUM, and by reporting the number of Rule violations by location. The strategy for implementation would be adjusted each year, based on budgeting trends for law enforcement personnel and levels of compliance. Implementation and enforcement of the Rule would be completed using Forest Service personnel.

Additional support for Travel Management Rule implementation has been received from the Oregon Parks and Recreation Department ATV Program, which granted the Willamette National Forest \$50,000 for labor and materials. The grant would be used to install road number signage and shared motorized use signage, and to create and install 6 new kiosks on major forest roads for interpreting the MVUM.

The Government Accountability Office (GAO, 2009) identified various problems in the ability of federal land managers to manage increased use by OHVs. Implementation of the Proposed Action would serve to lessen some of these problems by providing maps free of charge for the public, providing a CFR for consistent law enforcement, and simplifying the direction regarding where the public is allowed to drive their motor vehicles.

Figure 1: Example display of MVUM map and legend



Two administrative processes, not analyzed in this document, affect the designations which will be displayed on the Motor Vehicle Use Map. First, the identification of access zones within appropriate Management Areas is an administrative designation, based upon current use patterns and other management considerations. This determination will be made by line officers and is subject to change on future editions of the MVUM to reflect changing conditions, site specific management decisions, and improved data.

Second, as part of the process of designating roads where non-highway-legal vehicles are allowed, the Willamette National Forest is conducting a Motorized Mixed Use Analysis. This process examines the public safety hazards associated with mixed use (highway legal vehicles and non-highway legal vehicles using the same road) on all roads considered for use by non-highway-legal vehicles, and the findings are considered in the decision whether to open a route to mixed use, as well as to identify appropriate mitigation measures for safety. This process is expected to reduce the public safety risk associated with opening up a road to non-highway-legal motor vehicle use. The Mixed Use Analysis is not included as part of this NEPA analysis. Designation of roads for motorized mixed use is an administrative decision to provide for public safety.

There are many other possibilities for future processes that are neither addressed nor analyzed in this EA. More detailed maps may eventually be created and distributed. Signage (such as the green dot/red dot) may be utilized to indicate which roads are open for travel. A separate planning process may be used to address over-snow travel. Roads will continue to be closed or decommissioned through other NEPA processes. Trails may be created or closed through separate project analyses. Any separate process that results in a change to public access on the transportation system will be incorporated in future iterations of the MVUM.

In the future, some District Rangers may choose to use site-specific planning projects to designate some non-system routes accessing dispersed campsites as designated system routes. Access zones would not apply in these places, and campers would be required to drive only on the roads displayed as open to motor vehicles on the MVUM. Zones may be added or removed, where appropriate, based on site specific decisions.

Willamette National Forest officials will continue to meet with and discuss access and resource concerns with members of the public to develop site-specific projects. Yearly updates to the MVUM will provide opportunities to include changes regarding the designated system of travel routes and dispersed camping access.

CHAPTER 2

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

INTRODUCTION

This chapter describes and compares the alternatives considered for the project. Some of the information used to compare the alternatives is based upon the design of the alternative and some of the information is based upon the environmental, social and economic effects of implementing each alternative. The range of alternatives is limited to only those needed to address significant issues (36 CFR 220.7 (b)(2)). As discussed on page 7, no significant issues were identified for this project; the alternatives analyzed in detail are thus limited to the No Action and Proposed Action alternatives.

Alternative 1 will be referred to as the No Action alternative and Alternative 2 will be referred to as the Proposed Action for the remainder of this document.

ALTERNATIVES CONSIDERED, BUT ELIMINATED FROM DETAILED STUDY

- 1. Within riparian areas, restrict motorized travel to dispersed sites to designated system of roads and trails.*

This alternative was suggested in public comments submitted to the Forest in response to the Proposed Action. This alternative was not analyzed in detail because it does not fully meet the Purpose and Need, which is to continue to provide motorized access to existing dispersed camping opportunities. This alternative would eliminate motorized access to approximately 80-90% of dispersed camping sites on the Willamette National Forest. The Proposed Action meets the Purpose and Need of continuing to provide motorized access to existing dispersed campsites in a manner which protects resources by limiting travel off of designated routes to existing routes with an established history of passenger vehicle use.

The Forest has and will continue to complete site specific environmental analysis and may implement actions to close access routes and reduce, refine or close dispersed sites where unacceptable resource impacts are occurring. Adoption and implementation of the Respect the River Program, focused on efforts to mitigate resource impacts and educate visitors, has been effective and successful on a project-level basis. Local support of site-specific decisions has resulted in a high rate of user compliance and satisfaction with on-the-ground modifications of motorized access to traditional primitive campsites. The Forest is planning to implement the Respect the River program in more locations in the future, through partnerships and public support.

2. *Using road density standards, create a minimum transportation system that is streamlined, non-redundant and efficient.*

This alternative was considered to address public comments submitted to the Forest in response to the Proposed Action. This alternative was not fully developed because it does not fit within the project Purpose and Need, which is programmatic in scope. This alternative would require site-specific changes to the transportation system based on resource considerations. The Proposed Action takes a programmatic approach to restrict motor vehicle travel to a designated system of roads and trails, thereby prohibiting travel off of designated routes in all land management areas. Site-specific planning processes to implement decisions to manage resource and social impacts will continue under separate NEPA analyses. The Forest will continue to use the Roads Analysis to guide future recommendations on the decommissioning and/or storage of roads.

3. *Designate a travel system that retains natural quiet in important landscapes, watersheds and soundscapes.*

This alternative was considered to address public comments submitted to the Forest in response to the Proposed Action. The project Purpose and Need does not include designating a travel system for quiet and solitude. The Willamette National Forest Land and Resource Management Plan addressed the need for non-motorized recreation opportunities through land management allocations and associated standards and guidelines.

Opportunities currently available for people seeking natural quiet in the Willamette National Forest include congressionally designated Wilderness (23% of forest acres, and 580 miles of trail) and Semiprimitive Nonmotorized Forest Plan Management Area (4% of forest acres). Approximately 95% of total trail miles on the Forest are managed exclusively for non-motorized use and will remain that way through the implementation of the Proposed Action. Additional opportunities for natural quiet would be created by the prohibition on cross-country motorized use on all Forest acres and the opportunity to enforce the closure of Operational Maintenance Level 1 roads.

4. *Create a transportation system that minimizes impacts to the values of Inventoried Roadless Areas.*

Public comments received during pre-scoping and formal scoping of the Proposed Action indicated an issue with motorized use within and adjacent to Inventoried Roadless Areas. The Proposed Action restricts motorized use to a designated system of roads and trails within and adjacent to Inventoried Roadless Areas. Within Inventoried Roadless Areas, motorized access to dispersed campsites will be provided only through the use of existing system roads. The prohibition on cross-country travel will further enhance the values and features which characterize Inventoried Roadless Areas.

Developing an alternative to close existing roads to motorized use within Inventoried Roadless Areas is outside the scope of this analysis. Decisions to close roads and trails to motorized use will be made under separate, site specific NEPA analysis.

ALTERNATIVE 1 – NO ACTION

Under the No Action alternative, the Forest Service would not amend the Forest Plan to prohibit wheeled motorized travel off of the designated system of roads and trails. The Forest Plan would be in conflict with the implementation of the 2005 Travel Management Rule and would allow unmanaged motor vehicle use to continue on the Willamette National Forest. Motorized access to dispersed campsites would remain unmanaged.

ALTERNATIVE 2 - PROPOSED ACTION

The Willamette National Forest proposes to non-significantly amend the Land and Resource Management Plan as follows to make it consistent with the Travel Management Rule, which will prohibit motor vehicle travel **off** of a designated system of roads and trails.

The Proposed Action also includes guidance on which Forest Plan Management Areas are appropriate to allow the application of access zones (in which existing routes may be used to access dispersed camping sites via motor vehicle). Implementation of the Travel Management Rule will apply programmatically to all lands in the Willamette National Forest.

In accordance with provisions of the Travel Management Rule, and with the objective of minimizing resource damage associated with motorized travel off of designated routes, the Proposed Action would:

Non-significantly amend the Forest Plan to prohibit motorized travel off of a designated system of travel routes in all Management Areas.

The Willamette National Forest proposes to limit wheeled motorized travel to designated roads and trails in all Forest Plan Management Areas to provide consistency with the Travel Management Rule. This will require a non-significant amendment to the Forest Plan. In addition to amending Forest Wide Standard and Guidelines, amendments will be made to specific Management Areas to provide consistency within the Forest Plan.

Table 1 shows the current designation of each Management Area in the Forest Plan as it relates to wheeled motorized use, as well as the proposed change in condition. See Appendix C (Proposed Action Maps) for a visual representation of the existing and proposed designations for cross-country motorized use, as well as the system of roads and trails that have been designated for motorized use.

All roads currently designated or managed as open will be included as part of the system of roads and trails. Roads and trails currently managed as closed and those closed through the NEPA process will not be included as part of the designated system of roads and trails. Roads classified as Operational Maintenance Level 1 will remain closed.

Table 1: Willamette National Forest LRMP Management Areas: Existing condition and Proposed Action for cross-country motorized travel.

Management Area		Acres currently closed to cross-country motorized use	Total proposed acres to be closed to cross-country motorized use	Proposed change in condition
1	Wilderness	380,805	380,805	0
2a	OCRA Semiprimitive Motorized	0	1,152	1,152
2b	OCRA Semiprimitive Nonmotorized	4,906	4,906	0
2c	Opal Creek Scenic Recreation Area	13,538	13,538	0
3	H.J. Andrews Experimental Forest	15,379	15,379	0
4	Research Natural Areas	4,245	4,245	0
5a	Special Interest Areas*	23,958	27,942	3,984
5b	Hardesty-Mt. June Ecological Area	3,178	3,178	0
6a	Wild and Scenic Rivers – Wild	1,983	1,983	0
6b	Wild and Scenic Rivers – Scenic	1,237	1,237	0
6c	Wild and Scenic Rivers – Recreation	13,225	13,225	0
7	Old-growth groves	6,655	6,655	0
8	T & E Species – Bald Eagle	1,472	1,472	0
9a	Northern Spotted Owl Habitat Area*	69,045	69,045	0
9b	Pileated Woodpecker Habitat Area	9,513	9,513	0
9c	Marten Habitat Area	14,568	14,568	0
9d	Special Habitat Area*	31,355	31,355	0
10a	Dispersed Rec– Roaded Natural	0	299	299
10b	Dispersed Rec – Semiprimitive Motorized	10,539	9,106	19,645
10c	Dispersed Rec – Semiprimitive Motorized	0	8,873	8,873
10d	Dispersed Rec – Semiprimitive Nonmotorized	960	960	0
10e	Dispersed Rec – Semiprimitive Nonmotorized	69,898	69,898	0
10f	Lakeside Areas – Wildlife and Recreation	3,605	3,605	0
11	Scenic	0	277,397	277,397
12a	Developed Recreation Sites	2,709	2,709	0
12b	Developed Recreation – Special Use Sites	2,389	2,389	0
13a	Special Use Permit Areas	3,839	3,839	0
13b	Administrative Use sites	704	704	0
14a	General Forest	0	646,320	646,320
14b	General Forest With Deferred Timber Harvest	0	661	661
15	Rivers, Streams, Wetlands, Lakes and Adjacent Riparian Areas*	--	--	--
Total Acres		679,166	1,637,497	958,331

Footnotes for Table 1*

- *MA 5a - Special Interest Areas:* The LRMP states that cross-country motorized use would be allowed only if consistent with objectives listed in the implementation guides. Because these implementation guides have not been completed for each of the SIAs, we will consider cross-country motorized use to be allowed only in SIAs specifically set aside for recreation purposes. For this reason, we describe the existing condition of the Fall Creek SIA and McKenzie River SIA as open to cross-country motorized travel. The rest of the SIAs were set aside to protect non-recreation resources and are therefore not necessarily consistent or compatible with cross-country motorized travel, and are therefore considered closed.
- *MA 9a - Northern Spotted Owl Habitat Area:* The LRMP states that motorized use is discouraged in this MA because of its disturbance effects. Although it does not specifically identify cross-country motorized use, we will consider it closed for this exercise, since it is not compatible or consistent with the resource objectives of this MA. It is therefore considered not allowed in the existing condition.
- *MA 9d - Special Habitat Area:* Although the LRMP does not specifically identify cross-country motorized use as prohibited in this area, it is assumed for this exercise that it is not compatible or consistent with the resource objectives of this MA. It is therefore considered not allowed in the existing condition.
- *MA 15 - Rivers, Streams, Wetlands, Lakes and Adjacent Riparian Areas:* The LRMP does not specifically identify cross-country motorized use as prohibited in this area. Since this MA overlaps with others, we will defer to the underlying management area in describing the existing condition.

Revisions to the Willamette National Forest LRMP are proposed to bring the Forest Plan into consistency with the implementation of the Rule (detailed in Table 2). The table below describes the current and proposed language for each citation. In addition to providing consistency with the Rule, the language changes will provide clarity regarding the type of motor vehicle use allowed forest-wide.

Table 2: Changes to the Forest Plan by citation

Citation	Existing Forest Plan Language	Proposed Change to Forest Plan Language
FW-026	Areas closed or restricted to off-road vehicle use shall be posted. A brief explanation of the reasons for the closure will also be posted.	<p>Wheeled motorized travel is allowed only on designated roads, trails and areas and will be identified on the Forest’s Motor Vehicle Use Map (MVUM) by type of vehicle and time of year. Non-street legal, off-road vehicles will only be allowed on designated routes and will be identified on the MVUM. Travel off of the designated system by any type of motorized vehicle is prohibited.</p> <p>The following vehicles and uses are exempt from these designations (unless specifically prohibited in MA S&G):</p> <ul style="list-style-type: none"> • Aircraft • Watercraft • Over-snow vehicles • Limited administrative use by the Forest Service. • Use of any fire, military, emergency, or law enforcement vehicle for emergency purposes. • Authorized use of any combat or combat support vehicle for national defense purposes. • Law enforcement response to violations of law, including pursuit. • Motor vehicle use that is specifically authorized under a written authorization issued under Federal law or regulations. • Use of a road or trail that is authorized by a legally documented right-of-way held by a State, county or other local public road authority. <p>Motorized travel off of the designated system for other government entities on official administrative business, contractors, leasees, permittees, and others with valid access rights will require written authorization from the Forest Supervisor or District Rangers in their respective Districts. This may be in the form of a contract, lease, permit, or other type of waiver as required to recognize valid rights of access.</p> <p>An exception is allowed for the limited travel off of the designated system by motor vehicles solely for the purpose of dispersed camping on existing routes only within 300 feet of certain designated routes as displayed on the MVUM. This exception may be administratively applied in appropriate locations within any Management Area unless specifically noted or unless all motorized access is prohibited in a Management Area.</p>

Citation	Existing Forest Plan Language	Proposed Change to Forest Plan Language
MA-1-22	Wilderness travel shall be by non-mechanical means consistent with the primitive character of Wilderness (FSM2326). Use of motors or motorized equipment shall be prohibited. The Forest Supervisor may approve exceptions for emergencies involving threats to life, health, or property. The Regional Forester may approve use of mechanized equipment for other situations.	No change needed.
MA-2a-01	This management area shall be made available for maximum use for a range of activities that provide Semiprimitive Motorized experiences as directed in the 1989 OCRA Management Plan.	No change needed.
MA-2a-04	Access by motorized vehicles, other than on roads to developed sites, shall be limited to snowmobiles, trailbikes, and ORVs not greater than 42 inches in width.	Remove this S&G to make MA consistent with FW-026
MA-2a-05	Trail feasibility should be coordinated with adjacent managing forest. The development of ORV, mountain bike and cross-country ski trails are encouraged.	No change needed.
MA-2b-04	The general area shall be closed to off-road and off-trail vehicles, except for over-the-snow use. Mountain bike use is restricted to established trails and roads.	No change needed.
MA-2c-49	Motorized vehicles shall not be permitted off of open roads. ORV use on open forest system roads may occur but shall not conflict with other vehicle traffic.	No change needed.
MA-3-05	The general area shall be closed to off-road vehicles.	No change needed.
MA-4-06	All recreation ORV use shall be prohibited.	Add S&G: Motorized access to dispersed campsites will be provided only through the use of existing system roads – no designated access zones shall be identified.
MA-5a-02	Area management practices should result in a physical setting that meets or exceeds the Roded Natural ROS class. Dispersed recreation and ORV use may occur if consistent with the objectives listed in the implementation guide.	No change needed – MA has no designated access zones identified or likely to be identified.
MA-5b-08	The general area shall be closed to off-road and off-trail vehicles.	No change needed.
MA-6a-05	Motorized use shall be prohibited in the Wild river area, except for search and rescue and other emergency situations.	No change needed.
MA-6b-01	The area shall be made available for maximum use for a range of trail and river related activities that are consistent with maintaining area conditions and providing Scenic river experiences. Except for area size, this management prescription will provide a physical setting for Roded Natural recreation.	No change needed.

Citation	Existing Forest Plan Language	Proposed Change to Forest Plan Language
MA-6b-05 MA-6c-04	The general area and trails shall be closed to off-road vehicle use, except for administrative purposes.	No change needed.
MA-6c-01	The area shall be made available for maximum use for a range of trail and river related activities that are consistent with maintaining area conditions and providing Recreational river experiences. This management prescription shall provide an ROS physical setting for Roded Natural recreation.	No change needed.
MA-7-02 MA-8-01 MA-9a-01 MA-9b-01 MA-9c-01 MA-9d-01 MA-11c-01 MA-11d-01 MA-11e-01 MA-11f-01 MA-15-19	Area management practices should result in a physical setting that meets or exceeds the ROS class of Roded Natural.	No change needed.
MA-7-03	ORV use shall not be permitted within management area boundaries.	No change needed.
MA-8-03	Off-road vehicle use shall be prohibited.	No change needed.
MA-9a-04	Motorized recreation activities shall be discouraged within SOHAs. Many SOHAs have highways or collector roads passing through them. Recreation activities associated with the use of these roads will be allowed, however roads not needed to access trailheads may be closed.	No change needed.
MA-9b-04	Motorized recreation activities shall be discouraged within PWHAs.	No change needed.
MA-9b-05 MA-9c-05	The general area shall be closed to off-road vehicle use.	No change needed.
MA-9c-04	Motorized recreation activities shall be discouraged within MHAs.	No change needed.
MA-10a-04, MA-10b-04, MA-10c-03	Access my motorized vehicles shall be limited to snowmobiles, trail bikes, and ORVs not greater than 42 inches in width. The general area is open to off-road vehicles and mountain bikes.	Revise this S&G to make MA consistent with FW-026: The general area is open to mountain bikes.
MA-10d-05 MA-10e-05 MA-10f-05	The general area shall be closed to off-road vehicles. Mountain bike use is restricted to established trails and roads.	Add S&G: Motorized access to dispersed campsites will be provided only through the use of existing system roads – no designated access zones shall be identified.

Citation	Existing Forest Plan Language	Proposed Change to Forest Plan Language
MA-11a-01 MA-11b-01 MA-11c-01 MA14a-01	Area management practices should result in a physical setting that meets or exceeds the ROS class of Roaded Modified.	No change needed.
MA-12a-09 MA-12b-07	The general area shall be closed to off-road vehicles.	Add S&G: Motorized access to dispersed campsites will be provided only through the use of existing system roads – no designated access zones shall be identified.
MA-13a	Not addressed	No change needed.
MA-13b	Not addressed	No change needed.
MA-14b-01	An ROS setting of Roaded Modified should be provided within the boundaries of this Management Area.	No change needed.

Non-Significant Forest Plan Amendment:

The Willamette National Forest proposes to designate a system of roads and trails for wheeled motorized use. All designations are based on existing management of roads and trails. Operational Maintenance Level 1 roads will now be officially closed to the public through this process. These roads are currently managed as closed. Trails which have been managed as non-motorized trails will not be designated for motorized use. The Forest is proposing to close 60% of its acres to motorized cross-country use by requiring visitors to use the designated system of roads and trails. However, natural limitations such as steep terrain and dense vegetation currently restrict the public to using their OHVs on approximately 18,000 Forest acres (approximately 1% of the Willamette National Forest; see page 30 for further discussion), resulting in a natural closure of the Forest to cross-country motorized use.

The implementation of the Proposed Action requires a non-significant amendment of the Forest Plan as per 36 CFR 219.10(f). This decision amends the Willamette National Forest Plan following the 1982 planning rule procedures.

The Secretary of Agriculture’s implementing regulation indicates the determination of significance is to be “based on an analysis of the objectives, guidelines, and other contents of the forest plan” (36 CFR 219.10(f)). The Forest Service has issued guidance for Plan amendments when using planning regulations in effect before November 9, 2000. This guidance, in Forest Service Land Management Planning Manual (FSM) 1926.51, lists four changes to the forest plan that may not be significant:

1. Actions that do not significantly alter the multiple use goals and objectives for long-term land and resource management;
 - This amendment will not change any Forest Land and Resource Management goals or objectives.
2. Adjustments of management area boundaries or management prescriptions resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management;

- Management area boundaries will not be adjusted.
- 3. Minor changes in standards and guidelines; and
 - This amendment adds a Forest-wide Standard and Guideline and changes the language of five Management Area specific Standard and Guidelines. The proposed changes regarding cross-country motorized use are minor, when the natural limitations of terrain and vegetation are taken into effect.
- 4. Opportunities for additional projects or activities that will contribute to achievement of the management prescriptions.
 - No additional management practices are included in this Forest Plan amendment. This amendment does not eliminate any future opportunities to achieve management prescriptions.

The proposed amendment to the Forest Plan is non-significant. The changes made in this decision will not significantly alter the relationship between levels of multiple use goods and services originally projected in the Willamette National Forest Land and Resource Management Plan, nor will they affect land and resources throughout a large portion of the planning area.

Programmatic exception to provide for continued motorized access to existing dispersed campsites in appropriate Forest Plan Management Areas.

This exception would allow for the application of designated access zones where appropriate to meet the Purpose and Need of continuing to provide motorized access to dispersed camping opportunities. Within designated access zones, travel off of the designated system of roads and trails displayed on the MVUM would be allowed for the purpose of accessing dispersed camping opportunities.

Within each designated access zone, motorized travel will be allowed off of the designated system road for the purpose of entering and exiting dispersed campsites within 300' of centerline of the designated system road. Travel in these zones will **only** be allowed along existing routes⁸ to existing campsites⁹.

Designated Access Zones will not be designated where they would provide motorized access to otherwise non-motorized areas including congressionally designated Wilderness, Non-motorized Semi-primitive Management Areas, and Research Natural Areas.

The identification of access zones within appropriate Management Areas is an administrative designation, based upon current use patterns and other management considerations. Designated access zones will not be identified along roads where it is known that no dispersed campsites exist, or along roads which would provide motorized

⁸ *Existing route*: a route with an established history of passenger vehicle use, as indicated by a road-bed width of greater than 50 inches, the predominance of compacted soil, and minimal vegetation growing in the travel way. New resource impacts (indicated by single or double tracks through vegetation) are **not** considered existing routes.

⁹ *Existing campsite*: an area obviously used by campers that usually contains a rock fire ring and minimal ground vegetation as the result of motor or foot traffic.

access to Inventoried Roadless Areas. Access zone designation will be made by line officers and is subject to change on future editions of the MVUM to reflect changing conditions, site specific management decisions, and improved data.

Hardened, existing sites (including turnouts, pullouts, quarries, and landings) located adjacent to designated routes with no distinct access routes will be considered part of the road prism, allowing for motorized access.

Yearly updates to the MVUM will provide opportunities to include changes regarding the designated system of travel routes and dispersed camping access zones. Access zones may be added or removed based on site specific decisions and improved information.

See Appendix C (Proposed Action Maps) for the locations of designated access zones on the Willamette National Forest.

COMPARISON OF ALTERNATIVES

This section provides a summary of the effects of implementing each alternative. Information in the table is focused on activities and effects where different levels of effects or outputs can be distinguished quantitatively or qualitatively among the alternatives.

Table 3: Comparison of No Action Alternative and Proposed Action

Analysis Component	Alternative 1: No Action	Alternative 2: Proposed Action
Purpose and Need: Meet National Direction	This alternative would conflict with the implementation of the 2005 Travel Management Rule.	This alternative would enable the implementation of the 2005 Travel Management Rule by designating a system of roads and trails for motorized use.
Purpose and Need: Continue to provide motorized access to dispersed campsites in a manner that protects resources.	This alternative would continue to provide motorized access to all dispersed campsites currently accessible. Motorized access to these campsites would remain unmanaged except through site-specific project implementation, providing the potential for additional resource impacts.	This alternative would provide motorized access to most dispersed campsites (90-95%) currently accessible by motor vehicle. Motorized travel off of the designated system of roads and trails would only be allowed where designated access zones have been identified; in these zones travel would be allowed only on existing routes to existing campsites in an effort to protect resources.
Purpose and Need: Amend the WNF LRMP to make it consistent with the Travel Management Rule.	The Forest Plan would not be consistent with the 2005 Travel Management Rule.	The Forest Plan would be consistent with the 2005 Travel Management Rule.
Effect to Motor Vehicle Recreationists: Amount of land open to motorized travel off of the designated system of roads and trails	Approximately 60% (958,331 acres) of WNF land will remain open to travel off of the designated system of roads and trails. Only 1% (approximately 18,000 acres) of Forest land is in active use by people traveling cross-country in their motor vehicles due to the limiting nature of the terrain, dense vegetation and existing Forest Plan direction.	Wheeled motorized travel will be restricted to the designated system of roads and trails on all WNF acres.
Effect to Motor Vehicle Recreationists: Motorized access to Operational Maintenance Level 1 Roads and roads closed through the NEPA process.	668 miles of Operational Maintenance Level 1 roads would continue to be managed as closed to the public, though no official CFR would prohibit use. Roads closed through the NEPA process but not yet implemented on the ground will remain open to public use until implementation of the closure.	This alternative would officially close 668 miles of Operational ML1 Roads to public use. An unknown portion of these roads are actively used by the public, but the majority of them are in an undrivable condition. Any road closed through the NEPA process will not be included on the designated system.
Effect to Motor Vehicle Recreationists: Effect to people accessing dispersed camping opportunities with motor vehicles.	People would continue to legally access any campsite that can be driven to without damaging natural resources.	People would continue to legally access campsites located on system roads or within designated access zones. It is expected that legal motorized access will be retained to 90-95% of campsites. No shortage of motorized camping opportunities is expected.
Effect to Motor Vehicle Recreationists: Effect to people using over-snow motor vehicles to recreate.	People using over-snow vehicles would continue to access all areas except where the use is prohibited.	People using over-snow vehicles would continue to access all areas except where the use is prohibited.

Analysis Component		Alternative 1: No Action	Alternative 2: Proposed Action
Effects to other Resources:	Non-motorized Recreation	Opportunities for non-motorized recreation will continue on Forest roads and trails. 95% of the trail system will continue to be managed for non-motorized use only, and all WNF roads will continue to allow non-motorized uses. Unmanaged motor vehicle access to dispersed campsites intersected by system trails may impact non-motorized visitors' experience.	Opportunities for non-motorized recreation will continue on Forest roads and trails. 95% of the trail system will continue to be managed for non-motorized use only, and all WNF roads will continue to allow non-motorized uses. The prohibition of cross-country use and the closure of ML1 roads may provide additional opportunities for quiet recreation. The management of motorized access to dispersed campsites may reduce user conflicts.
	Law Enforcement	Without amending the Forest Plan, the Travel Management Rule of 2005 will not be enforced. LE officers will rely on existing CFR Regulations to cite people for damaging natural resources with motor vehicles.	The Travel Management Rule of 2005 will be implemented and Law Enforcement officers will be able to cite people for driving off of the designated system of roads and trails. The MVUM will be a cleaner and more efficient tool for regulation.
	Aquatic Resources	The No Action Alternative will not have any immediate direct effects on soil conditions, water quality or fish. Minor indirect effects could occur at the site scale level due to continued unauthorized travel. Soil resources, water quality and MIS fish populations will be maintained at current levels.	There will be no negative direct or indirect effects associated with implementing this action. Minor beneficial effects will be generated as unauthorized travel is decreased which will reduce the site scale impacts that are occurring to soil conditions, water quality and fish. Population stability, growth and survival for all MIS fish will not be impacted by the Proposed Action.
	Wildlife	The No Action alternative would have slightly more disturbance to wildlife than the Proposed Action due to limited off-road motorized travel that is currently occurring on the Forest. The potential for ATV travel to disturb nesting bald eagles near reservoirs in the southern half of the forest that draw down during the summer would be higher in the No Action alternative than the Proposed Action. More off-road disturbance to elk and deer in some meadows areas of the Forest would also be expected in the No Action alternative. Greater impacts to meadow habitat caused by rutting from wheeled travel is expected in the No Action alternative which relies on motorists to avoid off-road areas where wheeled travel would cause resource damage rather than banning motorized travel outright in these areas.	The Proposed Action would result in a non-measurable improvement in wildlife habitat that is not meaningfully measurable at the forest-level scale for most species. This improvement is expected largely due to a clearer understanding of the regulations by wheeled motorized vehicle users under the Proposed Action.
	Sensitive Plants	There could be severe adverse direct and indirect effects of the No Action alternative on sensitive plants. If motorized vehicle use were not	The Proposed Action could have a beneficial direct and indirect effect on sensitive plants because motorized vehicle access routes will be clearly

Effects to other Resources (cont):	Sensitive Plants (cont)	clarified and restricted to roads, trails and access routes on a Forest map, vehicles could directly damage plants or indirectly affect them through damage to their habitat (impacted drainage, removal of cover) when creating new roads and access to dispersed camping sites.	displayed on a map and use of undesignated routes will be enforced, keeping vehicles away from sensitive plant populations.
	Heritage Resources	Off-road, cross-country travel would continue to occur unabated, potentially resulting in degradation to sensitive cultural resources, such as archaeological sites and historic linear features. Cross-country off-road vehicle use will continue to result in disturbance to some sites in the form of rutting and displacement of cultural deposits.	The net effect to cultural resources should be positive in that cross-country travel with motorized vehicles will be reduced. The MVUM represents an effective Law Enforcement tool to keep motorized vehicles out of areas with fragile or sensitive resources.
	Noxious Weeds	The No Action alternative has adverse indirect effects on weed populations because the unregulated use and creation of new access trails to dispersed camping areas and continued use of roads already managed as closed creates and maintains habitat for weed infestations.	The Proposed Action would have a beneficial effect on weeds by keeping available habitat and thus populations from expanding. The prohibition on cross-country motorized travel and the requirement to remain on existing routes when accessing dispersed campsites will limit the creation of new disturbance.

CHAPTER 3

AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS

INTRODUCTION

This chapter summarizes the physical, biological, social and economic environments of the affected project area and the potential changes to those environments due to implementation of the alternatives. It also presents the scientific and analytical basis for the comparison of alternatives presented in Table 3.

The Proposed Action is programmatic in scope; therefore effects analyses will be more general than would be expected for site-specific projects. This project does not:

- Introduce any new wheeled motorized use,
- Identify roads or trails for closure,
- Designate new roads, trails or areas for public use,
- Allow for new motorized use in areas of dispersed camping, or
- Propose any new ground disturbing activities.

This chapter presents the effects associated with the change in the Forest Plan that restricts all motorized use to a system of roads and trails and eliminates cross-country motorized travel. The effects of providing an exception to the prohibition of off-system motorized travel through the designation of dispersed camping access zones will also be disclosed.

The cumulative effects discussed in this chapter include an analysis and a concise description of the identifiable present effects of past actions to the extent that they are relevant and useful in analyzing whether the reasonably foreseeable effects of the Proposed Action and its alternatives may have a continuing, additive and significant relationship to those effects. The cumulative effects of the proposed action are primarily based on the aggregate effects of the past, present and reasonably foreseeable future actions.

This EA hereby incorporates by reference the following analyses:

- Recreation Resources Specialist Report (Forson, 2009)
- Wildlife Resources Specialist Report (Doerr, 2009)
- Botanical Resources Specialist Report and Biological Evaluation (Lippert, 2009)
- Aquatics Resources Specialist Report (Lewellen, 2009)
- Heritage Resources Specialist Report (Lindberg, 2009)

Specialist Reports in their entirety are contained in the Project Record. These reports contain the detailed information, lists of species, references, and technical documentation that the resource specialists relied upon to reach the conclusions in this EA.

Motorized Recreation

MANAGEMENT DIRECTION

Current Forest-wide standards and guidelines include:

FW-034 Forest Trail System – *The Forest shall provide for the use of the existing trail system that serves the needs of recreationists and satisfies demand levels for a wide range of trail related motorized and non-motorized activities consistent with individual management area objectives.*

FW-024 Dispersed Recreation – *A diversity of off-road vehicle recreational opportunities should be provided across the Forest where consistent with the criteria specified in FSM 2355.12.*

Three Management Areas are identified in the Willamette National Forest Land and Resource Management Plan (LRMP) as Dispersed Recreation – Semiprimitive Motorized.

MA-2a-04, MA-10b-04 and MA-10c-03 Recreation Management – *Access by motorized vehicles shall be limited to snowmobiles, trail bikes and ORVs not greater than 42 inches in width. MA-10b-04 and 10c-03 also include: The general area is open to off-road vehicles and mountain bikes.*

Eleven Management Areas are identified in the Willamette LRMP where the general areas are closed to off-road and off-trail motorized vehicles, including:

MA 1 – Wilderness; MA 2b – Oregon Cascades Recreation Area – non-motorized; MA-4 – Research Natural Areas; MA 5b – Hardesty-Mt. June Ecological Area; MAs 6a, 6b and 6c – Wild and Scenic Rivers; MA 7 – Old Growth Groves; MAs 10d and 10e, Dispersed Recreation, Semiprimitive Nonmotorized use; and MA 10f – Lakeside Areas.

Additional management direction for MA 9a – North Spotted Owl Habitat; MA 9d – Special Habitat Area; and MA 15 – Rivers, Streams, Wetland, Lakes, and adjacent Riparian Areas is discussed below.

EXISTING CONDITION

Wheeled motorized recreation on the Forest occurs primarily on system roads and trails, with some use occurring on non-system roads and trails. As compared to eastside forests, cross-country use of motorized vehicles is limited on the Willamette National Forest due to steep terrain and a prominence of dense vegetative undergrowth which impedes mechanical transport off-road or off-trail.

Motorized Recreation Opportunities

Recreational riding is mostly limited to existing roads and trails, both system and non-system. Unauthorized, user-created routes are typically short segments (less than 550 feet) found in popular dispersed recreation areas or adjacent to private land. These routes allow the user to get their vehicles off the constructed road into a campsite or off of

private property onto the Forest road system. Forest visitors utilize motorized vehicles to access many dispersed recreation opportunities, including berry picking, gathering forest products and hunting.

The Forest has focused development and management for recreational riding of wheeled off-road vehicles at two popular destinations, Huckleberry Flat OHV Trail and the Santiam Pass Recreation Area. Recent planning efforts for both locations have resulted in decisions to designate, enhance and manage a system of routes primarily for use by non-street legal vehicles (though street legal vehicles are allowed on many of the roads within the areas). Both locations have planned and are implementing public facilities, including restrooms, staging areas, safety and resource mitigations, and visitor information, with support from partners and volunteers. Huckleberry Flats OHV Trail offers about 53 miles of OHV low-standard roads and trails suitable for quads and motorcycles. An additional 10 miles of trails are planned. Area managers report a high level of visitor satisfaction at Huckleberry OHV Trail.

Once fully implemented, the Santiam Pass Recreation Area will feature 26.5 miles of road open to motorized mixed use, 9 miles of road converted to OHV trails, and 8 miles of newly developed and reconstructed OHV trail. In addition, two loop trail systems designed for young riders as learning areas will be developed. Within the project area, motorized travel is restricted to the designated system of roads and trails. A 100-ft buffer is designated along system roads to allow visitors to continue to access dispersed campsites with their motor vehicles. Along the Santiam Wagon Road, visitors will be allowed to camp only in designated sites.

An additional 17 miles of existing trail on the Forest are open to motorized use suitable for motorcycles.

Off-Highway Vehicle (OHV) use, (non-street legal vehicles), presently occurs on system roads across the Forest for recreational exploration and touring. Currently, there are 3,930 miles of system road open to motorized “mixed-use” which includes both street legal and non-street legal vehicles. OHV use also occurs on non-system routes connected with dispersed recreation sites and closed roads where closures are ineffective in preventing motorized access. In some areas, mudding by OHVs is occurring along power-line right-of-ways, in wet meadows and along reservoir shorelines and bottoms during draw-down. During hunting season, OHV use on system roads and non-system routes increases, with some hunters using OHVs to travel off of system roads to retrieve game.

Motorized Recreation on System Roads

In most cases, motor vehicle use on forest roads is light; however, certain times and places may have activities that increase traffic levels substantially. For example, traffic on a holiday weekend may increase substantially in popular recreation areas. In some areas on the Forest, motor vehicle use is not well controlled and is inconsistent with Forest Plan Standards and Guidelines. There is no overall Forest Travel Plan or Motor Vehicle Use Map comprehensively identifying which roads and trails specific types of

motorized uses are authorized. Additionally, seasonal restrictions for motorized use on system roads are not clearly marked, causing inconsistency in user compliance to closures and restrictions. On the ground signage and user information regarding motorized mixed-use on system roads is lacking, creating potential for public safety risks.

Limited motorized use is occurring on Operational Maintenance Level 1 roads, in cases where a road has mostly, although not completely, been blocked by vegetative growth. A road is classified as Operational Maintenance Level 1 as a reflection of its non-drivable condition. These roads are generally closed by installations (berms or gates) or by nature (vegetation or water damage). Some of these roads have not been closed through the NEPA process, but are managed as closed by the Forest Service as a reflection of their condition. Operational Maintenance Level 1 roads are not maintained to support vehicular traffic and have been stabilized for weather. Operational Maintenance Levels 2 and above are maintained to varying degrees, and are open to motorized use.

Operational Maintenance Level 1 roads, even when mostly impassible, are flatter and often contain less vegetation than the surrounding area, making them appealing to OHV users. Preliminary field surveys indicate approximately fifty percent of Operational ML1 Roads located on the Detroit, Sweet Home and Middle Fork Ranger Districts are drivable by a truck. It is estimated that most ML1 Roads located on the McKenzie River Ranger District are appropriately classified. Ongoing efforts are in effect to identify and assess roads which may have been misclassified as Operational Maintenance Level 1 so that people may continue to access appropriate roads with their motor vehicles. Of the 1,032 miles of ML1 Roads, 364 miles have also been closed through the NEPA process for specific, resource related reasons.

Table 4: Miles of Forest Service system roads by Operational Maintenance Levels

Operational ML	Number of Miles
ML1: Assigned to intermittent service roads during the time they are closed to vehicular traffic. The closure period must exceed 1 year. Basic custodial maintenance is performed to keep damage to adjacent resources to an acceptable level and to perpetuate the road to facilitate future management activities. Emphasis is normally given to maintaining drainage facilities and runoff patterns. Planned road deterioration may occur at this level. Roads receiving Level 1 maintenance may be of any type, class, or construction standard, and may be managed at any other maintenance level during the time they are open for traffic. However, while being maintained at level 1, they are closed to vehicular traffic, but may be open and suitable for non-motorized uses.	1,032
ML2: Assigned to roads open for use by high clearance vehicles. Passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses. Log haul may occur at this level.	4,953
ML3: Assigned to roads open and maintained for travel by a prudent driver in a standard passenger car. User comfort and convenience are not considered priorities. Roads in this maintenance level are typically low speed, single lane with turnouts and spot surfacing. Some roads may be fully surfaced with either native or processed material.	325
ML4: Assigned to roads that provide a moderate degree of user comfort and convenience at moderate travel speeds. Most roads are double lane and aggregate surfaced. However, some roads may be single lane. Some roads may be paved and/or dust abated.	85
ML5: Assigned to roads that provide a high degree of user comfort and convenience. These roads are normally double lane, paved facilities. Some may be aggregate surfaced and dust abated.	146
Total	6,541

Motorized Recreation; Off of the Designated System

The Willamette National Forest Land and Resource Management Plan (LRMP) identifies 679,166 acres of land as closed to cross-country motorized use. The Northwest Forest Plan does not specifically address cross-country motorized use in Late Successional Reserves. In accordance with the LRMP, the remaining 958,831 acres (approximately 60% of the Forest's land base) is currently managed as open to cross-country motorized travel (See Table 1 in Proposed Action, page 15).

However, use of OHVs on most of this land is limited by terrain and vegetation. The analysis team identified approximately 18,000 acres (1% of Forest acres) as potentially drivable land for OHVs. This was done through a Geographic Information System (GIS) analysis that identified Forest Management Areas currently open to cross-country travel with slope less than 30%, within one-half mile from an existing system road, and not catalogued as shrubland ecotype. This is considered to be an over-estimate of acres that are drivable by OHVs.

Unregulated motor vehicle access is causing impacts to National Forest resources including noise and disturbance to private land owners and visitors; soil erosion; damage to sensitive plants; disturbance to seclusion-dependent wildlife species; introduction of non-native species; damage to heritage resources, and damage to wetlands and meadows. Both State and Federal regulations address potential for cross-country travel impacts by prohibiting motorized use which damages vegetation and/or displaces soil.

For example, Forest Service regulation 36 CFR 261.13(h) states, "It is prohibited to operate any vehicle off National Forest System... roads in a manner which damages or unreasonably disturbs the land, wildlife, or vegetative resources." However, it has been a perennial challenge to allow for cross-country travel and prevent resource damage on a significant portion of the Forest. Once tracks or routes are established, it is difficult to assess whether ongoing use is in conflict with regulatory language. Although many of these impacts have been localized and tolerated, escalating levels of off-road motor vehicle use is increasing the magnitude and intensity of resource damage across the Forest.

Motorized Access to Dispersed Campsites

Camping in undeveloped settings outside of designated wilderness areas is a popular activity on the Forest. Concentrations of dispersed campsites are typically found along every major river corridor. Isolated campsites located in upland areas, often on landings, are used by hunters during the fall. Vehicle access to dispersed camping sites relies on a combination of system roads, non-system spurs and user-created routes. The majority of non-system roads are short (between 200 and 300 feet long), though some extend to 0.25 miles or longer. In some high use locations "spider webs" of routes lead into and interconnect dispersed sites. Many dispersed sites are located in pullouts along a designated road, in rock quarries, at road junctions, or at other hardened areas. In some locations, walk-in camping is utilized by visitors to access sites which have been blocked off to motorized access as a means to protect resources. Most of the dispersed camping

on the Forest is accessed using street-legal vehicles. In some areas, especially where hunting is prevalent, dispersed camps serve as staging areas for Class 1 OHVs (quads).

Use levels and number of campsites vary across the Forest. A difference in visitation patterns is reflected in the density of campsites located on different Ranger Districts (Table 5), which are each typified by different geographic travel corridors from the Willamette Valley. Detroit Ranger District, for example, draws visitors from the Salem and Portland metro areas, and contains approximately three times the campsites per acre as compared to Sweet Home or Middle Fork Ranger Districts. The McKenzie River Ranger District is a popular destination for visitors from the Eugene/Springfield area, and also contains a high density of campsites when compared to the other Ranger Districts. Table 5 displays the estimated number of dispersed campsites located on the Forest (excluding sites not accessed by motor vehicles). The recreation resources on the Sweet Home and Detroit Ranger Districts are administratively managed as the Santiam River Zone.

Table 5: Density of dispersed campsites per Willamette National Forest acre (excluding congressionally designated Wilderness)

District	Number of Campsites	Total Acres of Forest Land (excluding Wilderness)	Density (camps/acre)
Detroit Ranger District	450	206,457	2.18×10^{-3}
Sweet Home Ranger District	130	176,721	0.74×10^{-3}
McKenzie River Ranger District	500	285,319	1.75×10^{-3}
Middle Fork Ranger District	475	628,910	0.76×10^{-3}
Total	1555*	1,297,407	1.20×10^{-3}

*The number of campsites are rough estimations based on corporate knowledge, field observations, and some GIS data sets.

Current management of dispersed camping access varies by location, demand and impacts to the resources. Various methods are used to manage resource impacts associated with motorized use at individual sites across the Forest, including:

- Law enforcement patrols,
- Public education,
- Active rehabilitation of riparian areas,
- Strategic placement of barriers to manage access at individual sites, and
- Restriction of motorized access.

On the Detroit and Sweet Home Ranger Districts, the Respect the River program has implemented an active approach to managing impacts of dispersed recreation to adjacent riparian areas. Since 2007, intensive management actions have been taken to reduce impacts at sixteen sites along Highway 22 and within the Marion Creek and Upper Santiam river corridors.

ALTERNATIVE 1: NO ACTION

Under the No Action alternative, the Forest Service would not amend the Forest Plan to clarify direction regarding motor vehicle use and 958,331 acres of the Forest would remain open to motorized travel off of a system of designated roads and trails, with OHV use occurring on approximately 18,000 of those acres. The Forest Plan would not be consistent with the 2005 Travel Management Rule, which would make effective implementation of the Rule difficult, and would continue an inconsistent approach to managing motor vehicle use across the Forest.

Unregulated motor vehicle access and the associated impacts to National Forest resources would continue under the No Action alternative. The potential to increase and spread the scope of resource damage across the Forest would continue.

Access to dispersed campsites would not be limited under the No Action alternative. Multiple existing routes into campsites, some extending up to 550 feet from system roads, would remain open to motorized use.

ALTERNATIVE 2: PROPOSED ACTION

Direct and Indirect Effects

The Proposed Action is to non-significantly amend the Forest Plan to clarify direction regarding motor vehicle use to make the Forest Plan consistent with the 2005 Travel Management Rule.

Non-significantly amend the Forest Plan to prohibit motorized travel off of a designated system of travel routes in all Management Areas

In all Management Areas of the Willamette National Forest where cross-country motor vehicle use is allowed (Management Areas 2a, 5a, 10A, 10B, 10C, 11A, 11C, 11D, 11F, 14A and 14B), motor vehicle use would be allowed only on a designated system of roads and trails. Amending the Forest Plan as proposed would change Forest Plan direction for all of these management areas. This would enable the 2005 Travel Management Rule to be implemented, reducing the places where recreationists can travel using motorized vehicles. As a result of the non-significant Forest Plan Amendment and implementation of the 2005 Travel Management Rule, motor vehicle use would be better managed across the Forest to minimize resource damage, to promote public safety, and to minimize conflicts with other uses.

The effect on motorized recreationists would be a reduction in the area in which they can operate motor vehicles. All “areas” (places other than designated roads and trails) would be closed to motorized use; any travel off of this designated system would be illegal.

This would result in a reduction of 958,331 acres where visitors would be legally allowed to ride their motor vehicles. However, the vast majority of these acres are not readily accessible to motor vehicles due to steep terrain, dense vegetation, and distance from roads. The actual loss of motorized access will occur only in flat areas with little vegetation near system roads, comprising one percent (approximately 18,000 acres) of total Forest land (see Existing Condition, p. 30 for further discussion).

If the Forest Plan is amended and motor vehicle use is effectively confined to designated roads and trails, the percentage of the entire Forest “used” by motor vehicle operators would decrease. Future NEPA decisions to develop or close roads and trails to motorized use could increase or decrease the percentage of the Forest used by motor vehicle operators.

Motorized use on all Operational Maintenance Level 1 (ML1) Roads would be prohibited. The majority of ML1 Roads are not currently accessible or in use by the public. However, some ML1 Roads have evidence of having been driven by the public. Drivable ML1 Roads are typically short, dead-end segments (<0.10 miles). The process of assigning accurate Maintenance Levels to Forest Roads is ongoing.

The public would no longer be allowed to drive on roads that have been officially closed through the NEPA process where the closures have not yet been implemented on the ground.

The reduction in places motor vehicles can legally access will affect some hunters, and to lesser extent, people who explore the National Forest road system or gather firewood, berries, mushrooms or other forest products.

Many hunters use motor vehicles during hunting season to look for game, access favorable hunting areas, and retrieve game. The majority of this activity is on Operational ML 2-5 (open) roads; however, some “road hunting” occurs on non-system roads and Operational ML 1 roads where access isn’t entirely restricted by management efforts or nature. Allowing motor vehicle use only on designated roads and trails will reduce the places hunters can drive. This will impact hunters unwilling or unable to walk or ride a horse to places they would otherwise drive. The magnitude of this impact is expected to be small, as only one percent (approximately 18,000 acres) of Forest land is currently accessible to wheeled motorized use due to limiting terrain, dense vegetation and current Forest Plan direction. (see Existing Condition, p. 30 for further discussion). In addition, Operational ML1 Roads are currently managed as closed to motorized travel.

People who drive Forest Service roads for sight-seeing or exploration will be minimally affected by the Proposed Action. They would have an additional burden of carrying a map and using it to determine which roads are legal for motorized use. Most roads previously open for exploration would remain so. The degree of uncertainty or confusion by visitors trying to understand where they can drive is not expected to be substantial.

People driving off of the designated system of roads and trails for legitimate, permitted activities will not be affected. For example, individuals may obtain permits to gather firewood by the hosting ranger districts, and are afforded access to areas and non-system routes designated in the permit on a case-by-case basis.

People who collect firewood for on-Forest camping (incidental use), by traveling off-road or off of system roads will be somewhat affected by the requirement to drive only on the

designated system of roads. People who gather berries, mushrooms or other forest products will be minimally affected because most use open roads for access to gatherings areas and are accustomed to walking to gather these products. Those people who drive on closed roads or off-road for gathering will have fewer areas accessible to them by motor vehicle.

Cross-country use is expected to change very little, based on current use patterns limited by terrain and vegetation throughout the Forest. The exclusion of cross-country travel opportunities could potentially displace this activity to other areas. This use occurs primarily in isolated areas and in ways which affect resources such as fragile meadows, wetlands and riparian areas. Removing cross-country motorized travel through the implementation of the Travel Management Rule could potentially push OHV use to other areas, including public lands managed by other Federal and State agencies and private land. Monitoring of recent efforts to sign and enforce OHV closures on the shoreline of Hills Creek Reservoir indicates a high rate of compliance and reduced impacts by OHV use. Currently, it does not appear that this use has been relocated to other local areas.

Over-snow vehicle use would not be affected by the proposed Forest Plan amendment. The 2005 Travel Management Rule allows travel with over-snow vehicles except where such use is restricted or prohibited. This Forest Plan Amendment does not propose any meaningful changes regarding existing prohibitions or restrictions. Under the proposed Forest Plan amendment, over-snow vehicles would be exempt from direction allowing motor vehicle use only on designated roads, trails and areas in Management Areas where motorized use is allowed.

Programmatic exception to provide for continued motorized access to existing dispersed campsites in appropriate Forest Plan Management Areas.

Visitors would continue to legally access most existing dispersed campsites using their motor vehicles. Motorized access to approximately 90-95% of dispersed campsites will be retained. Field crews visiting dispersed campsites have reported the availability of campsites. Anecdotal evidence from their observations suggests the current supply of dispersed campsites is adequate to meet demands for dispersed camping, even on the busiest of weekends during the summer.

Within designated access zones visitors will be able to travel off of the designated system of roads, for the purposes of dispersed camping, along existing routes and within 300' of the system road. These zones will be displayed on the Motor Vehicle Use Map.

Where dispersed camping sites are located beyond 300 feet from a designated route, motorized access would be reduced. In order to use these sites, campers would need to park and walk into them, or select other sites accessed by designated routes or within designated access zones.

In some situations, campsites will be located on non-system routes where access has not been provided through the designation of a zone. In these situations, campers would be required to park along the system road and walk into the campsite, or choose a different

campsite accessible via access zone. Some campsites may be located at the end of Operational ML1 Roads. These sites would not longer be accessible by motor vehicles unless located within a designated access zone.

Dispersed campers accessing the sites described above may need to alter their use to accommodate the implementation of the Rule. Instead of camping in places where they would be required to walk into camp, some campers may choose to substitute campsites located in designated access zones or along system roads. The magnitude of visitor displacement and site substitution is not expected to be large enough to cause noticeable changes to the social conditions in areas where dispersed campsites can be accessed by motor vehicles.

Visitors participating in day use activities (fishing, swimming, etc) will be confined to the designated system of roads and trails. The designated access zones allow an exception for motorized access for dispersed camping only. Other recreationists will be required to park along system roads to access dispersed activities. This may result in a higher number of vehicles parked along the system roads in popular river corridors. It is unlikely to displace day visitors from their favorite locations.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest.

Past, present, and foreseeable future actions related to motor vehicle recreation include the following:

- The 2005 Travel Management Rule would be put into effect. This will allow motor vehicle use only on designated roads and trails across all portions of the Willamette National Forest where motor vehicle use is allowed. The direct effect of this action will be to reduce the area where people can drive their motor vehicles, particularly their non-highway-legal vehicles (over-snow vehicles would be excluded from this effect). This effect is the same as that caused by the proposed Forest Plan amendment.
- The entire Willamette National Forest has approximately 4,300 miles of road open to motorized travel, approximately 3,900 miles of which will be open to all vehicles including those not highway-legal following the completion of a safety analysis. There are currently no “areas” proposed where motor vehicle use would be allowed.
- Motorized access to dispersed camping will be allowed only on designated roads or on existing routes in designated access zones. The direct effect of this action will be a slight reduction (approximately 5-10%) in the number of campsites that can be accessed via motor vehicle on the WNF.
- Nationally, sales of recreation vehicles and participation in OHV activities have been relatively stable in recent years, decreasing slightly. (Cordell et al, 2008) The Government Accountability Office (GAO, 2009) reports an increase in OHV use on Federal Lands between 2004 and 2008.

- National Visitor Monitoring Survey (NVUM) Results on the Willamette National Forest indicate that visitors who participate in OHV activities dropped from 2.04% (34,377 visitors) in 2002 to 0.8% (10,883 visitors) in 2007. These results represent a snapshot in time and do not necessarily indicate a trend. As indicated through public comments received and the popularity of OHV destination areas Huckleberry Flat and Santiam Flats, OHV use remains an important and legitimate use of the Forest.
- Site-specific planning processes will continue on the Willamette National Forest to: close roads for resource concerns or maintenance reasons, build or designate new roads and trails for non-motorized and/or motorized use, and implement management solutions to reduce impacts from dispersed camping related motorized use in riparian areas.
- Roads will continue to be decommissioned, closed and built through separate planning processes, likely resulting in a reduction of roads open for public use into the future.

The cumulative effects of the actions listed above are expected to be:

- A potential increase in use on roads and trails where motor vehicles are allowed on the National Forest. This effect is likely to be minimal, if observed at all in the immediate future, because cross-country travel is currently limited by terrain and vegetation in most areas of the forest and the Proposed Action does not create major changes in opportunities available. Over the long-term, with the closure of additional roads through separate planning processes, it is expected that this effect may become more pronounced as use may be restricted to a smaller subset of road miles. With the opportunities available for both street legal and non-street legal vehicle use, it is expected this effect will be minimal.
- Increased use of roads and off-road areas on lands of all ownerships as people are displaced from areas they like to use on the National Forest. Again, this effect is likely to be minimal, if observed at all because cross-country travel is currently limited by terrain and vegetation or Forest Plan direction on approximately 99% of Forest acres. Landowners who do not want motorized use on their lands would incur additional enforcement actions and costs (gates, signs, fences, enforcement personnel). It is not expected that this would be a large effect because most people who use National Forest lands do so because they do not want to use other lands for their recreational activities (because of respect for private lands, or they do not want to risk being in violation of rules or restrictions unknown to them).
- Increased use of dispersed campsites located in designated access zones and on system roads, as well as additional restrictions to motorized access to dispersed camps in high use areas. It is expected that the majority of visitors desiring to drive their motor vehicles to campsites will still be able to do so following the implementation of the Proposed Action.

In summary, the implementation of the Travel Management Rule could result in a reduction in the places motor vehicles (particularly non-highway-legal vehicles) can travel, and potential displacement of those users to other areas. The opportunities for street legal and non-street legal motorized vehicle use will slightly decrease. However,

this decrease is only expected to minimally impact motorized vehicle recreationists. People will continue to use lands and road systems owned and managed by all public agencies in the area in which they are accustomed to using. The potential displacement of motorized recreationists from portions of the National Forest may affect private landowners as motorized recreationists look for new places to drive their vehicles.

Because an estimated 90-95% of existing dispersed campsites would continue to be accessible by motorized vehicle use after implementation of the Travel Management Rule, the impacts on dispersed recreation are expected to be minimal.

Non-Motorized Recreation

EXISTING CONDITION

Non-motorized recreation includes such activities as mountain biking, hiking, horseback riding, camping, hunting, fishing, and nature viewing. All these activities require some type of motor vehicle use to get to the activity area, while the activities themselves are generally considered non-motorized. An exception discussed earlier is “road hunting”, which includes driving as part of the hunting activity.

Many recreationists pursuing non-motorized activities typically desire quiet and solitude, and consider motor vehicle use as intrusive. In dispersed camping areas, particularly during hunting season, where OHV motorized use mixes with non-motorized use, some non-motorized visitors have been displaced, or push deeper into the Forest, in search of quieter, less dusty areas.

All of the Willamette National Forest is open to non-motorized recreation. Designated wilderness, Management Area 1, prohibits motor vehicle use, accommodating individuals seeking quiet and solitude in 23% of the Forest. Another 4% of the Forest acres are managed for semi-primitive, non-motorized recreation, as prescribed through the Forest Plan. Currently, there are 6.4 miles of road traversing semi-primitive non-motorized Management Areas.

There are a total of 1,700 miles of trail on the Willamette National Forest. Of this total, 34% of trail miles are located within congressionally designated Wilderness where motorized and mechanized use is prohibited; 60% of trail miles located outside of wilderness are managed for non-motorized use only; about 5% of total trail miles are managed for motorized use. In total, nearly 95% of the trail mileage is non-motorized.

Many roads are also open for non-motorized travel, particularly where infrequent vehicle travel makes these opportunities desirable for those seeking quiet and solitude. Hunters frequently seek out areas with less traveled roads where game is prevalent for access and hunting camps, and where cross-country motorized travel is not prominent. Some roads are closed to motor vehicles, affording the non-motorized visitors additional opportunities.

Motorized recreation use on the Forest occurs primarily on travel ways. In areas of concentrated OHV use at Santiam Pass and Huckleberry Flat, non-motorized recreationists seeking quiet areas without intrusion of dust and noise from OHV use typically choose to recreate elsewhere.

ALTERNATIVE 1: NO ACTION

Under the No Action alternative, non-motorized recreation is expected to continue as it does currently. As motorized use increases, opportunities for non-motorized recreationists to find quiet and solitude on roads and in more remote areas will decrease. Some dispersed camping areas where OHV use is prevalent on existing spurs and dirt tracks would become increasingly unattractive for non-motorized recreation activities. Hunters will be challenged in finding areas where game is relatively undisturbed by cross-country motor vehicle use or motorized use on non-system roads and logging spurs.

ALTERNATIVE 2: PROPOSED ACTION

Under the Proposed Action, it is expected that motorized use of closed roads and cross-country travel would be reduced in all Management Areas that allow motor vehicle use. This use could be displaced to the designated open roads and trails. The more popular of these roads and trails may have increased motorized use, increasing dust, noise and disturbance for those who desire quiet and solitude. The expected changes in use will not cause noticeable impacts.

Some people engaged in non-motorized recreation activities may shift their use to closed roads and non-motorized areas. Because of the Forest's extensive system of non-motorized trail, hiking, equestrian, and mountain bike use on this system is not expected to change. Special forest products gatherers may have to walk or bike longer distances to favored gathering sites if they typically use non-system and closed roads to access these areas.

Areas where off-road motorized use is occurring would have such use reduced as the 2005 Travel Management Rule is implemented. These areas may become more attractive for non-motorized recreation activities. Hunters seeking non-motorized opportunities to hunt near closed roads and spurs will be afforded more opportunities under the Proposed Action.

Executive Orders 11644 and 11989 require the Forest Service to provide a variety of recreation opportunities for the visiting public and to protect resources from damage occurring from motorized use. The prohibition of motorized travel off of the designated system of roads and trails is highly consistent with the intent of these orders.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest. Non-motorized recreation occurs in many areas off of National Forest System lands, including private lands, State of Oregon lands, County or local community lands, Tribal lands, and lands

administered by other federal agencies (e.g., Bureau of Land Management, National Park Service).

The primary effect of the prohibition of cross-country motorized use would be to restore or sustain non-motorized recreational opportunities in all Management Areas of the Willamette National Forest. This expected effect would be that of people changing where they elect to pursue non-motorized recreational activities on the National Forest, rather than choosing to go off the National Forest. Therefore, it is not expected that restoring or sustaining non-motorized recreational opportunities on National Forest System lands would have any meaningful influence on non-motorized recreational use off of the National Forest.

Law Enforcement

EXISTING CONDITION

Currently, Forest Service officials are somewhat limited in the effectiveness of enforcing off road vehicle use rules and regulations. With the entire forest being open unless closed by special order, and our enforcement officers being concentrated near high use recreation areas, often times resource damage caused by unlawful off road vehicle use goes undetected for long periods of time. Additionally, it is not clear to the public where mixed use by street legal vehicles and OHVs is allowed.

Citations are currently issued only for damage to Forest resources. Title 36 CFR 261.13(h) states, "It is prohibited to operate any vehicle off National Forest System... roads in a manner which damages or unreasonably disturbs the land, wildlife, or vegetative resources." It is a challenge to cite violators of this regulation, as it is very difficult to connect specific actions with new resource damage. There are several legal issues that limit enforcement actions.

ALTERNATIVE 1: NO ACTION

Under the No Action alternative, the existing condition will continue. Roads, trails and areas that are currently open to motorized use would continue to be open unless special closure orders were developed. Resource damage will continue to be an issue off road, and where mixed use traffic may occur (between street legal and off road vehicles) will continue to remain unclear.

Under the No Action alternative, it is expected that the 2005 Travel Management Rule would be applied, but enforcement will be ineffective in Management Areas where cross-country motorized use is currently allowed. Where the Rule is applied effectively, enforcement of travel management is expected to be more effective than is the current situation. However, having some Management Areas where the Travel Management Rule is enforceable, and other Management Areas where the rule is not enforceable may lead to confusion as the public will not know where motor vehicle use is allowed only on designated routes or areas, and where such use is not restricted. When such confusion exists, enforcement of motor vehicle restrictions across the entire Forest becomes

difficult because the courts tend to excuse violations when people cannot easily distinguish where varying rules apply on the ground. Thus, taking no action to amend the Forest Plan to enable application of the Travel Management Rule on all Management Areas of the Forest may limit the Forest Service's ability to enforce the Travel Management Rule across the entire Willamette National Forest.

ALTERNATIVE 2: PROPOSED ACTION

The non-significant Forest Plan amendment, the implementation of the 2005 Travel Management Rule, improved signing in the forest, and issuance of the Motor Vehicle Use Map all work together to improve the ability of law enforcement to enforce rules and regulations. By designating the Forest, "closed to motorized use unless designated open," the Motor Vehicle Use Map would designate open roads, trails, and areas making the regulations more clear to forest users. The Motor Vehicle Use Map will provide forest managers the ability to protect resources currently being damaged by off road vehicles, and will provide a safer driving situation for forest visitors by designating and illustrating on the MVUM where mixed use is and is not allowed.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest.

In addition to the Forest Plan amendment, the implementation of the 2005 Travel Management Rule, improved route number signing, and the issuance of the Motor Vehicle Use Map, the Forest continues to implement other actions such as site-specific planning processes to implement management actions that protect riparian areas from impacts associated with motorized use and the continual improvement of travel management signage informing the public of where they are allowed to take their motor vehicles. Taken together, these steps will improve the ability of Law Enforcement to prosecute people who knowingly break the law and cause damage to natural resources.

Wildlife

MANAGEMENT DIRECTION

The Forest Plan direction for biological resources is contained in the Land and Resource Management Plan for the Willamette National Forest (USDA Forest Service 1990) plus subsequent plan amendments including those evaluated in the Final Supplemental Environmental Impact Statement on the Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl, referred to here as the Northwest Forest Plan (See Specialist Report: USDA and USDI 1994). The Forest Plan, as amended, combines the forest-level strategy for managing land and resources on the forest with the Northwest Forest Plan's regional strategy for managing old-growth and late-successional forest ecosystems on federal lands. The Forest Plan goals and direction and desired future condition for biological resources are specified in the plans for each management area.

EXISTING CONDITION

Federally Threatened Species:

The only federally listed wildlife species found on the forest is the northern spotted owl (*Strix occidentalis caurina*) which is federally threatened. This owl prefers older conifer forest stands with at least 60% canopy cover for nesting, roosting, and foraging. Younger conifer stands typically with trees greater than 11 inches in diameter may be used as dispersal habitat. Suitable owl habitat, owl nesting and areas of designated critical habitat occur throughout the forest. The environmental baseline of this species on the Forest is described in USFWS (See Specialist Report: USFWS 2009). Potential disturbance to northern spotted owls from motorized equipment is described in Forest Service (See Specialist Report: USDA 2007) and summarized here. Outside of the breeding period, motorized vehicles are thought to have no disturbance effects to owl. During the critical breeding period from March 1-July 15, motorized equipment within 65 yards of an active nest may distract the nesting pair to the extent of significantly interfering with normal nesting activity and cause injury to the young. Also owls which nest near existing noises are likely to be habituated to the background disturbances so motorized travel that is consistent with the existing condition is thought to have no effect on nesting owls. Motorized equipment use within 0.25 miles of the nest during the entire nesting period from March 1-September 30 may distract owls from their normal activities to a minor degree, but not to the extent of causing harm.

Forest Service Sensitive Species:

For a list of Forest Service Sensitive Species found on the Willamette National Forest and their associated habitats, see Table 1 in Wildlife Resources Specialist Report in the project file.

Management Indicator Species

The use of Management Indicator Species (MIS) in project planning is established by National Forest Management Act regulations. MIS are species whose response to land management activities can be used to predict the likely response of a wide range of species with similar habitat requirements. The Final Environmental Impact Statement of the Willamette National Forest Land and Resource Management Plan identified MIS and the rationale for their selection (USDA Forest Service 1990). This list is summarized in Table 2 of the specialist report in the project file.

ALTERNATIVE 1: NO ACTION

The No Action alternative reflects the current condition of designated motorized travel by wheeled vehicles on the 1.6-million acre Willamette National Forest and represents the existing baseline. Currently there are about 4,230 miles of road and 70 miles of trails managed as open to some type of motorized wheeled vehicles. The Forest supports about 170 bird species, 64 mammal species, and 30 amphibians and reptilian species. The degree of impact from wheeled travel varies among species and is influenced by such factors as the proximity of hiding cover near roads, the frequency of traffic, the timing of vehicle use (e.g., day vs. night, spring vs. fall), and the ability of species to habituate to baseline travel conditions. Many wildlife species show some degree of avoidance of

heavily-traveled roads, and disturbance to motorized vehicles is a management concern when it occurs during critical periods of the species life history. On the Willamette National Forest, wildlife concerns with motorized travel include disturbance to elk on winter range and year-round foraging areas and disturbance to bald eagles, peregrine falcons, and other raptors during the nesting season. Many of these concerns have been mitigated with seasonal and yearlong road closures and road obliteration. Some direct mortality occurs to various wildlife species from collisions with motorized vehicles on the Forest, but the level of such mortality is thought to be minor and insignificant at the population level. There are no known barriers to movement of any wildlife species from motorized travel on the Forest.

The No Action alternative would have slightly more disturbance to wildlife than the Proposed Action due to limited off-road motorized travel that is currently occurring on the Forest. The potential for ATV travel to disturb nesting bald eagles near reservoirs in the southern half of the forest that draw down during the summer would be higher in the No Action alternative than the Proposed Action. More off-road disturbance to elk and deer in some meadows areas of the Forest would also be expected in the No Action alternative. Greater impacts to meadow habitat caused by rutting from wheeled travel is expected in the No Action alternative which relies on motorists to avoid off-road areas where wheeled travel would cause resource damage rather than banning motorized travel outright in these areas.

ALTERNATIVE 2: PROPOSED ACTION

Effects of the Proposed Action are described with respect to changes in the baseline condition described above for the No Action alternative. Because the Proposed Action would reduce motorized travel compared to the current condition, any measurable effect should be beneficial to wildlife. Because the current management does not permit cross-country travel that results in resource damage and current off-road travel is very low Forest-wide, the Proposed Action would result in a very small improvement in wildlife habitat that is not meaningfully measurable at the forest-level scale for most species. This improvement is expected largely due to a clearer understanding of the regulations by wheeled motorized vehicle users under the Proposed Action.

Federally Threatened Species:

The Proposed Action would result in no measurable change in forest vegetation and therefore have no effect on spotted owl habitat, including designated critical habitat. The Proposed Action would not increase off-road travel and would allow motorized travel on roads and trails that are currently being used for that purpose. The small decrease in travel along Operational Maintenance Level 1 roads would mostly occur during the fall hunting season outside of the main breeding period and is not expected to result in a disturbance reduction that is measurably beneficial to spotted owls. There are no negative effects to owls from the Proposed Action. Therefore, the Travel Management Rule implementation is expected to have no effect to northern spotted owls.

Forest Service Sensitive Species:

The list of Forest Service sensitive species documented or suspected on the forest include 10 birds, 5 mammals, 3 amphibians, 1 reptile, 3 mollusks, and 3 insects (Table 1 in Wildlife Resources Specialist Report). Implementation of the Proposed Action would have no negative effects to any species. Potential beneficial effects are discussed by individual taxa below.

a) Sensitive Birds: No meaningful improvement in habitat for any sensitive bird species would be expected from the Proposed Action. The main potential negative effect to current permitted motorized wheeled use relates to the potential for disturbance during the nesting season. The bald eagle nesting period is from January 1 to August 31. Operating motorized equipment within 0.25 miles of the nest in closed vegetation or within 0.5 miles if visible from the nest (i.e. line-of-sight) can distract the nesting pair to the extent of significantly interfering with normal nesting activity and causing nest abandonment or injury to the young. The nesting period for peregrine falcons is from about Jan. 15 to July 31 and vehicle use within 0.5 miles of nests (farther under some circumstances) during that period may adversely affect nesting success. The Forest has actively managed to reduce disturbance to nesting bald eagles and peregrine falcons from motorized vehicles by permanently or seasonally closing some roads and trails. Currently some eagle nests in the southern half of the forest are along reservoirs that draw down during the nesting season. OHV use along the exposed shoreline created by the drawdown has the potential to disrupt nesting success and would be prohibited under the proposed travel rule. There are no known conflicts with motorized wheeled vehicle use and peregrine nesting that would be resolved with the Proposed Action. There are no known disturbance conflicts between current legal off-road use of wheeled motorized vehicles and nesting of other sensitive bird species (shown in Table 1 of the Wildlife Specialist Report in the project file) that would be mitigated by the Proposed Action. Therefore, implementation of the proposed travel rule would have a beneficial effect to bald eagles and likely have no impact to American peregrine falcons, buffleheads, yellow rail, black swift, harlequin ducks, Lewis woodpecker, white-headed woodpecker, purple martin and northern waterthrush.

b) Sensitive Mammals: No meaningful improvement in habitat for any sensitive mammal species would be expected from the Proposed Action. Current off-road vehicle use is not known to be in conflict with any roosting or foraging activities of sensitive bats on the forest. A reduction in off-road vehicle use should be beneficial to wolverines and fishers, which tend to avoid areas of human activities. However, neither of these mustelid species has been found on the Forest in recent decades and most of road use of motorized vehicles that would be restricted in the Proposed Action is occurring near open roads due to the difficult terrain. Therefore, implementation of the proposed travel rule would likely have no impact to Townsend's big-eared bat, pallid bat, fringed myotis, wolverine and fisher.

c) Sensitive Herptiles: Oregon spotted frogs occur in areas of the Willamette National Forest where wheeled off-road vehicle use is currently not permitted. Potential yellow-legged frog habitat similarly occurs along streams where off-road motorized use is not allowed due to resource damage. Oregon slender salamanders utilize forested areas with

large amounts of downed woody material that would not be measurably affected by the proposed reduction in off-road use. Northwestern pond turtles nest and forage along reservoirs that draw down during certain seasons. Similar to bald eagles described above, these shorelines may currently receive some ATV use that would be restricted in the Proposed Action. Normally this would benefit the turtles, except that the Forest is already restricting off-road use in such areas where pond turtles nest or otherwise concentrate. Therefore, implementation of the proposed travel rule would likely have no impact to Oregon spotted frog, foothill yellow-legged frog, Oregon slender salamander and northwestern pond turtle.

d) Sensitive Mollusks: Potential benefits of the Proposed Action to sensitive mollusk species would be subtle and difficult to measurably demonstrate. Salamander slugs are found in forest habitat with vine maple understories that are not conducive to off-road vehicle use without resource damage. Likewise off-road vehicles should not currently be operating in perennially wet meadows that are potential habitat for evening field slugs and Crater Lake tightcoils because of likely resource damage. Implementation of the travel rule would better clarify that these areas are not permitted for wheeled vehicle use. Because existing impacts to sensitive mollusks from permitted off-road vehicle use have not been identified on the Forest, implementation of the proposed travel rule would likely have no impact to salamander slugs, evening field slugs and Crater Lake tightcoils.

e) Sensitive Insects: Mistletoe is a host plant for Johnson's hairstreak forest canopy of western hemlock and other conifers and would not be affected by motorized off-road travel. The caddisfly, *Rhyacophila chandleri*, uses streams and streamside vegetation where off-road motorized travel is currently not permitted due to resource damage. The Proposed Action would prohibit off-road travel in some dry grass meadows on the southern half of the forest that is potential habitat for mardon skippers. Many of these meadows have been surveyed and the skipper has not been detected so it is unlikely that occupied habitat exists in areas where travel would be reduced. Therefore implementation of the proposed travel rule would likely have no impact to Johnson's hairstreak, *Rhyacophila chandleri* and mardon skipper.

Management Indicator Species

Effects of the Proposed Action on spotted owls, peregrine falcons, and bald eagles have been discussed in the above sections. The reduction in off-road motorized travel in the Proposed Action is not expected to have measurable benefit to the forest habitat used by marten, pileated woodpeckers, or cavity excavators or to the nesting success of woodpeckers and other cavity excavators since most off-road use occurs outside the breeding season and not in heavily forested habitat. A small reduction in disturbance to marten from ATVs and other motorized vehicle along Level 1 roads would be expected with implementation of the travel rule, but this reduction in disturbance is not expected to result in greater numbers of marten on the Forest since off-road vehicle use is not thought to be a limiting factor for the species. In the southern portion of the Willamette, there are numerous drier meadows near the existing road system where off-road vehicle users are recreationally driving about. These grass-forb meadow areas are choice foraging habitat for deer and elk. The current off-road use is disturbing big game use of the meadows

and, in some instances, causing damage by wheels tearing into the sod which reduces forage productivity and allows for the spread of undesirable weeds (Figure 2). The proposed travel rule would prohibit off-road wheeled motorized travel in these areas, rather than rely on the individuals to determine that their actions are not causing resource damage. The Proposed Action is expected to benefit to deer and elk by reducing disturbance in key foraging areas and by reducing impacts to these meadows from off-road use.



Figure 2: Forage meadow damaged by off-road wheeled vehicle use. This meadow on the Middle Fork Ranger District was converted from a brush field by the Forest Service and volunteers to improve habitat for deer and elk. Off-road recreational driving caused extensive rutting in this and other such meadows under a powerline corridor and allows for an increase in weeds.

Migratory Birds, including Raptors

Most migratory birds found on the Willamette National Forest nest in trees, shrubs, riparian areas and wetlands that are not substantially affected by permitted off-road motorized travel. The Proposed Action should slightly reduce disturbance to a limited number of avian species utilizing drier grass/forb areas for nesting and chick rearing. Overall any benefits are not expected to be quantifiable as off-road use is limited spatially on the forest (e.g., near existing open roads) and mostly occurs outside of the breeding season.

Rare and Uncommon Species not addressed above

The great gray owl forestwide and the red tree vole in the northern half of the Detroit Ranger District are rare and uncommon species. Both these species utilize forest habitat where off-road motorized travel is limited and would not measurably benefit from the Proposed Action.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest. The Proposed Action would be beneficial to the general wildlife resource by slightly reducing motorized travel and would have no negative cumulative effects with other current and reasonably foreseeable actions. Future actions would be analyzed on a site-specific analysis at the project or district level. The Proposed Action would be consistent with Forest Plan standards and guidelines for wildlife. There would be no irreversible and irretrievable commitments of wildlife resources or biodiversity under the Proposed Action.

Sensitive Plants

MANAGEMENT DIRECTION

The National Forest Management Act provides a framework for rare botanical resources in that it calls for maintaining viability of all desired native species. Forest Service policy, to implement this direction, is to ensure viability of sensitive species and to preclude actions that will contribute to the federal listing of a species by surveying for and analyzing the effects of ground-disturbing activities on sensitive botanical species

The Willamette Land and Resource Management plan (USDA Forest Service 1990) as amended by the Northwest Forest Plan (See Specialist Report: USDA and USDI, 1994) provides direction for management of sensitive plant species and rare and uncommon species. In addition, Amendment 158 to the Willamette Land and Resource Management Plan adds four Conservation Strategies as management direction for *Aster gormanii*, *Ophioglossum pusillum*, *Cimicifuga elata* and *Frasera umpquaensis*.

EXISTING CONDITION

Of the populations of sensitive plants located on the Willamette National Forest, several are located near roads. Most of these populations are on rock outcrops or sites where motorized access is unlikely. However, there are sensitive plant populations that are at risk of adverse effects due to unregulated motorized use off-road. In 2008, the habitat of *Frasera umpquaensis*, which grows in mesic meadow habitats, was torn up by off-road vehicles making donuts, resulting in 12” deep ruts in a meadow. Other species that grow in this type of habitat that could be impacted include *Gentiana newberryi*, *Lupinus sulphureus ssp. kincaidii*, *Sisyrinchium sarmentosum* and *Agoseris elata* (the last 3 are only suspected, not documented on the Willamette NF). There are no sensitive nonvascular (lichens, bryophytes or fungi) species that exist in these types of vulnerable habitat.

Species of federal, state and local importance are included on the Regional Forester's Sensitive Botanical Species List for the Willamette National Forest. This list can be found as Attachment 1 to the Botany BE, located in the project file.

ALTERNATIVE 1: NO ACTION

There could be adverse direct and indirect effects of the No Action alternative on sensitive plants. If motorized vehicle use were not clarified and restricted to roads, trails and access routes on a Forest map, vehicles could directly run over plants or indirectly affect them through damage to their habitat (impacted drainage, removal of cover) when creating new roads and access to dispersed camping sites.

Because there are few populations of *Frasera* and *Gentiana* on this Forest, there could be cumulative adverse effects. One third of the populations of *Frasera* (1 out of 3) and one half of the populations of *Gentiana* (1 out of 2) are in meadows that could be adversely affected.

ALTERNATIVE 2: PROPOSED ACTION

Under the Proposed Action, the Forest plan would be clarified so as to enable the 2005 Travel Management Rule to be effectively implemented Forest-wide. Motor vehicle use off of roads would be substantially reduced. The Proposed Action could have a beneficial direct and indirect effect on sensitive plants because motorized vehicle access routes will be clearly displayed on a map and use of undesignated routes will be enforced, keeping vehicles away from sensitive plant populations.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest. Based on the limited direct and indirect effects of this action, no cumulative effects are identified for the Proposed Action.

Noxious Weeds

MANAGEMENT DIRECTION

The final EIS for Pacific Northwest Region Invasive Plant Program, Preventing and Managing Invasive Plants (See Specialist Report: USDA 2005) amended the Willamette Land and Resource Management Plan and prescribed standards for prevention, inventory, early detection & rapid response on new invasive plant populations as well as restoration guidelines for treatment sites and cooperation with other agencies and landowners.

Amendment 259 of the Willamette Land and Resource Management Plan (See Specialist Report: USDA 1999 and USDA 2007) has four sections. It prescribes that prevention be integrated into all management activities; dictates that manual control may occur anywhere without additional environmental analysis, allows for release of biological control agents approved by the US Department of Agriculture, and prescribes treatment methods for weed infestations depending on site-specific analysis.

The Willamette National Forest Integrated Weed Management Environmental Assessment (See Specialist Report: USDA 2007) states that each infestation of weeds will be managed according to its classification. New invaders will be eradicated using all

control methods available and will have the highest priority for treatment. Established infestations will be kept in check through biological and manual control methods. The last category, potential invaders, will be treated as new invaders if they are discovered on National Forest lands.

EXISTING CONDITION

Noxious weed species are found in areas where disturbance is common because they are good competitors for space and nutrients in early seral habitats. Roadsides and dispersed camping areas are constantly being disturbed and provide excellent habitat for weeds to grow. All of the species on the Willamette National Forest weed list (Attachment 2 in Specialist Report) are found along roadsides. Weeds are commonly dispersed along roads through road maintenance activities (dirt with seeds being spread up and down the road shoulders as the ditches are cleaned) and through recreationists' vehicles picking up mud with seeds and dropping their load at the next dispersed camp site.

A table describing the invasive plant species on the Willamette National Forest can be located in the Project File.

ALTERNATIVE 1: NO ACTION

The No Action Alternative has adverse indirect effects on weed populations because the unregulated use and creation of new access trails to dispersed camping areas and use of roads already managed as closed creates additional new habitat for weed infestations.

ALTERNATIVE 2: PROPOSED ACTION

The Proposed Action would have a beneficial effect on weeds by keeping available habitat and thus populations from expanding. The prohibition on cross-country motorized travel and the requirement to remain on existing routes when accessing dispersed campsites will limit the creation of new disturbance and reduction of seed movement.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest. Cumulative effects of the No Action Alternative will be a small net increase in overall weed infestations as a result of increased habitat over time. As compared to the number of acres already infested, it will be an almost undetectable increase. Based on the limited direct and indirect effects of the Proposed Action, no cumulative effects are identified for the Proposed Action.

***Aquatic Resources* (Soil Conditions, Water Quality and Fish)**

MANAGEMENT DIRECTION

Aquatic Conservation Strategy (ACS) as amended in 2007:

As an integral part of the Northwest Forest Plan, the goal of the ACS is to maintain and restore the ecological health of watersheds and the aquatic ecosystems within them. Any

project being implemented on the Willamette National Forest (WNF) needs to analyze and determine that the project is not preventing the recovery of the ACS objectives.

Management Indicator Species (MIS):

Fish species within the WNF include spring Chinook salmon, bull trout, Oregon chub, rainbow trout, cutthroat trout, brook trout, sculpin, lamprey, mountain whitefish, large-scale suckers, dace, redbreast shiners, and northern pikeminnow; all are Management Indicator Species. Management Indicator Species are listed in the Willamette Land and Resource Management Plan and all federal projects need to ensure the viability of these species when conducting activities on National Forest System land. Spring Chinook salmon and bull trout are both listed as threatened under the Endangered Species Act (ESA) and Oregon chub are listed as endangered under the ESA.

EXISTING CONDITION

The WNF has 1,675,407 acres of land that it is responsible for protecting and managing. Within the WNF are sensitive soils, many miles of streams (intermittent, permanent non-fish bearing, and permanent fish bearing streams), as well as lakes and wetland meadows.

Soils: Soil conditions within the WNF are primarily within their natural range of physical conditions and are not exceeding Forest Plan standards and guidelines for soil compaction and displacement at the Forest level. Existing unauthorized travel is causing slight detrimental impacts to soil conditions but only at a site scale, and is not greatly preventing the recovery of healthy soil conditions at the Forest scale level.

Water Quality and Stream Characteristics: Several streams within the WNF are listed by the State of Oregon as water quality impaired, primarily due to temperature that exceeds the State of Oregon standards. The majority of streams within the WNF are stable with an average amount of large woody debris, secure banks and adequate side-channel and floodplain connectivity. Some streams are lacking in one or more of these listed habitat requirements. Existing unauthorized travel is slightly decreasing water quality by increasing sedimentation to the stream, but only at a site scale magnitude and is not impacting water quality conditions at the Forest scale level.

Fisheries: Most Management Indicator Species including rainbow trout and cutthroat trout are primarily stable and are distributed throughout most of their natural range. Spring Chinook salmon and bull trout have experienced significant habitat fragmentation primarily due to the construction of flood control dams but are continuing to inhabit and maintain at minimal population numbers within WNF from recovery and restoration efforts. Oregon chub populations are continuing to increase and could potentially be down-listed from endangered to threatened. The largest threat to Oregon chub is a lack of flood-plain connectivity due to flood controlling dams. Existing unauthorized travel is slightly effecting fish survival due to increased turbidity, but only at a site scale magnitude and is

not effecting the over-all survival and population growth of MIS fish species at the Forest scale level.

ALTERNATIVE 1: NO ACTION

The No Action Alternative will not have any immediate direct effects on soil conditions, water quality or fish. Indirect effects such as; minor soil displacement, slight increases of turbidity and insignificant harassment of fish could occur at the site scale level due to continued unauthorized travel. Soil resources, water quality and MIS fish populations will be maintained at current levels.

ALTERNATIVE 2: PROPOSED ACTION

The Proposed Action is only designating authorized routes, and as a result, no new ground disturbance will be occurring. Therefore, there will be no negative direct or indirect effects associated with implementing this action. Minor beneficial effects will be generated as unauthorized travel is decreased which will reduce the site scale impacts that are occurring to soil conditions, water quality and fish. Population stability, growth and survival for all MIS fish will not be impacted by the Proposed Action.

Riparian areas will be maintained and protected as no new ground disturbance or recreation activities will be occurring in these areas. Additional restoration activities, such as Respect the River on the Detroit Ranger District, are occurring independent from this project to address recreational impacts to the riparian reserve.

Due to no ground disturbance associated with the Proposed Action the effects determination for all ESA listed fish, for Essential Fish Habitat and for critical habitat is no effect. No consultation is needed with the regulatory agencies as a result.

This project was deemed consistent with the Aquatic Conservation Strategy because it is designed to contribute to maintaining or restoring the watershed condition over the long term. No new ground disturbance will be occurring and any unauthorized recreational use that is currently occurring in the riparian reserve will be prevented, generating a beneficial effect. The consistency of all actions included in the Proposed Action with the nine aquatic conservation strategy objectives of the Northwest Forest Plan has been evaluated. Project activities would not retard or prevent attainment of any of the strategy's objectives:

Objective 1: Maintain and restore the distribution, diversity, and complexity of watershed and landscape-scale features to ensure protection of the aquatic systems to which species, populations, and communities are uniquely adapted.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed campsites, and does not develop new routes or sites for off-road use, the distribution, diversity, and complexity of watershed and landscape-scale features would be maintained.

Objective 2: Maintain and restore spatial and temporal connectivity within and between watersheds. Lateral, longitudinal, and drainage network connections include floodplains,

wetlands, upslope areas, headwater tributaries, and intact refugia. These network connections must provide chemically and physically unobstructed routes to areas critical for fulfilling life-history requirements of aquatic and riparian-dependent species.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed sites and does not develop new routes or sites for off-road use, the spatial and temporal connectivity within and between watersheds would be maintained. The physical nature of existing movement corridors would remain unchanged.

Objective 3: Maintain and restore the physical integrity of the aquatic system including shorelines, banks, and bottom configurations.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed sites and does not develop new routes or sites for off-road use, the physical integrity of the aquatic system including shorelines, banks, and bottom configurations would be maintained.

Objective 4: Maintain and restore water quality necessary to support healthy riparian, aquatic, and wetland ecosystems. Water quality must remain within the range that maintains the biological, physical, and chemical integrity of the system and benefits survival, growth, reproduction, and migration of individuals composing aquatic and riparian communities.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed sites and does not develop new routes or sites for off-road use, water quality necessary to support healthy riparian, aquatic, and wetland ecosystems would be maintained. Use of motor vehicles on open roads, trails and within access zones would have no effect on water quality under this alternative.

Objective 5: Maintain and restore the sediment regime under which aquatic ecosystems evolved. Elements of the sediment regime include the timing, volume, rate, and character of sediment input, storage, and transport.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed sites and does not develop new routes or sites for off-road use, the existing sediment regime within the aquatic ecosystem would be maintained. Any reductions in sediment from eliminating wheeled motorized use off of the designated system would likely be unquantifiable.

Objective 6: Maintain and restore in-stream flows sufficient to create and sustain riparian, aquatic, and wetland habitats and to retain patterns of sediment, nutrient, and wood routing. The timing, magnitude, duration, and spatial distribution of peak, high, and low flows must be protected.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed sites and does not develop new routes or sites for off-road use, there would be no change to in-stream flow conditions. Therefore, there would be no effect to riparian, aquatic, and wetland habitats; and patterns of sediment, nutrient, and wood routing would be retained.

Objective 7: Maintain and restore the timing, variability, and duration of floodplain inundation and water table elevation in meadows and wetlands.

- Floodplain inundation and water table elevation would not be influenced by the Proposed Action, since use would be limited to existing roads and trails and would not affect any stream course or upland vegetation that could be tied to floods or water tables.

Objective 8: Maintain and restore the species composition and structural diversity of plant communities in riparian areas and wetlands to provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration and to supply amounts and distributions of coarse woody debris sufficient to sustain physical complexity and stability.

- The Proposed Action would unlikely have a quantifiable effect on adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, channel migration and amounts and distributions of coarse woody debris, sufficient to sustain physical complexity and stability.

Objective 9: Maintain and restore habitat to support well-distributed populations of native plant, invertebrate and vertebrate riparian-dependent species.

- Since the Proposed Action utilizes existing roads, trails, and routes into dispersed sites and does not develop new routes or sites for off-road use, habitat to support well-distributed populations of native plant, invertebrate, and vertebrate riparian-dependent species would be maintained.

Cumulative Effects:

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest. There will be no negative cumulative effects at the Forest scale from the No Action or the Proposed Action in conjunction with any current or reasonably foreseeable actions. Soil resources, water quality and fish will be maintained at current levels.

Heritage Resources

MANAGEMENT DIRECTION

The National Historic Preservation Act (NHPA) of 1966 (as amended in 1976, 1980, and 1992) is the foremost legislation governing the treatment of cultural (or heritage) resources by federal agencies - including the Forest Service - during project planning and implementation. Implementing regulations that clarify and expand upon the NHPA include 36 CFR 800 (Protection of Historic Properties), 36 CFR 63 (Determination of Eligibility to the National Register of Historic Places), and 36 CFR 296 (Protection of Archaeological Resources). In addition, the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA) of 1976, the Archaeological Resources Protection Act (ARPA) of 1979, the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, and Executive Order 13007 (Indian Sacred Sites) also guide the Forest Service decision-making as it relates to heritage resources. References are listed in Specialist Report in Project File.

The Willamette National Forest Land and Resource Management Plan (USDA Forest Service 1990) tiers to these previously mentioned laws and corresponding Forest Service manual direction as it sets forth standards and guidelines that specify procedures for complying with all mandates for federal laws, acts, executive orders, and federal regulations.

Forest-wide management standards and guidelines that are pertinent for this heritage resource effects analysis include:

- A cultural resource inventory shall be conducted for each proposed ground-disturbing activity and administered by a qualified professional archaeologist. The results of the inventory are documented in a report that serves as a planning document. (FW-263)
- The Forests' survey design strategy for cultural resource inventories shall be used to guide the inventory. (FW-264)
- Properties that may be affected by project activities will be evaluated for eligibility to the National Register of Historic Places(NRHP). (FW-265)
- Measures shall be developed to protect significant sites from adverse effects due to ground disturbing and other activities. (FW-267, FW-268, FW-270)
- Historic sites and trails that are eligible to the NRHP shall be maintained and protected from adverse effects. (FW-271)

The Willamette National Forest is party to the 2004 Programmatic Agreement among the United States Department of Agriculture (USDA) Forest Service Pacific Northwest Region (Region 6), the Advisory Council on Historic Preservation, and the Oregon State Historical Preservation Officer (SHPO) Regarding Cultural Resource Management in the State of Oregon by the USDA Forest Service (PA), which streamlines the implementation of the NHPA. This PA recognizes that some undertakings have little or no potential to affect historic properties (heritage resources) based on their nature or scale, and allows for streamlined processes of review in compliance with Section 106 of NHPA.

National policy as well as Regional direction has been developed for compliance with NHPA in the implementation of the Travel Management Rule. This guidance includes recommendations for determining the "Area of Potential Effect" (APE), an appropriate level of inventory, and considerations for assessing effects. An analysis consistent with this direction was employed.

EXISTING CONDITION

The human history on the Willamette National Forest has previously been summarized in the Cultural Resource Overview of the Willamette National Forest, Western Oregon (See Specialist Report: Minor 1987) and numerous other more recent studies serve as the basic references of ethnographic and historic background for this analysis. Ethnographic evidence suggests that highly mobile groups indigenous to the western Cascade Mountains once lived during the winter along low elevation streams, accessing the uplands during the summer and fall to hunt game and gather berries and other important plant resources. Extensive trail networks were important for traversing the Cascade Mountains, linking the Molalla Indian bands with each other, surrounding tribes and important resource procurement and trade centers (See Specialist Report: Winkler 1991; Zenk and Rigsby 1998).

Motorized travel off of surfaced roads has the potential to result in disturbance of archaeological deposits and historic features. Many instances of damage to heritage resources from motorized vehicle use off of surfaced roads have been documented over

the years through monitoring efforts conducted by heritage staff. Efforts have been made to block motorized access to sensitive site areas where possible, and in some cases damaged areas have been rehabilitated. Programs have been implemented on the forest to mitigate resource damage that can occur with human use such as dispersed camping.

ALTERNATIVE 1: NO ACTION

The No Action Alternative would result in adverse indirect effects on heritage resource sites. Under this scenario, off-road, cross-country travel would continue to occur unabated, potentially resulting in degradation to sensitive cultural resources, such as archaeological sites and historic linear features. Our current program of monitoring of cultural resource site conditions for management consistent with Forest Plan direction indicates cross-country off-road vehicle use has resulted in damaging disturbance to some sites in the form of rutting and displacement of cultural deposits, and increase erosion in areas denuded of vegetation. Law enforcement has little authority to prevent such activities.

ALTERNATIVE 2: PROPOSED ACTION

Implementation of the proposed action should have a positive affect on heritage resources, as it would designate existing roadways for motorized use, while prohibiting cross-country off-road use by motor vehicles and prohibiting motorized use on unsurfaced roads and user-created routes. Thus, motorized travel would be restricted to existing surfaced routes, which in effect form a barrier for the archaeological deposits. There would also be a reduction overall in motorized access for dispersed camping in turn reducing potential effects to heritage resources in existing dispersed campsites. Management for resource protection in dispersed campsites will continue through site-specific programs such as “Respect the River” and road decommissioning efforts accomplished under separate analyses.

Currently management plans are in place for the Forest’s most significant and well-preserved historic transportation routes, such as the Santiam Wagon Road and the Oregon Central Military Wagon Road. These linear features have been evaluated and ranked by segment according to their integrity and preservation, and include designations of segments where motorized traffic is acceptable and where it is prohibited. The MVUM would be compatible with these existing designations.

Auditory and visual intrusions into the historic or cultural site landscape could also potentially affect the integrity and setting of historic properties. This pertains particularly to historic structures or complexes, as well as potentially traditional cultural properties. Most of the significant historic structures on the forest are accessible by surfaced road; though many remain in fairly remote areas, and some in unroaded areas such as wilderness. The implementation of the TMR would not increase visual or auditory intrusions to these historic properties.

In short, the net effect to cultural resources should be positive in that cross-country travel with motorized vehicles will be reduced. The MVUM can be used as a tool to keep motorized vehicles out of areas with fragile or sensitive heritage resources. This

alternative also provides Law Enforcement officers the authority to cite visitors who travel off of routes designated for motorized vehicle use.

Thus, it has been determined that implementing the TMR as proposed will have no effect to historic properties eligible (or potentially eligible) to the National Register of Historic Places (NHRP) under the terms of the PA between the ACHP, the Oregon SHPO and Region 6 of the US Forest Service. Although numerous heritage sites potentially eligible for inclusion to the NHRP are located within the area of potential effect, the Forest's proposal to implement the TMR will allow motorized vehicle use only on existing routes and expressly prohibit motorized cross-country travel, thus reducing impacts to heritage resource.

Cumulative Effects

Cumulative effects were assessed based on past, present and foreseeable future actions. The scale of analysis is defined as the Willamette National Forest. Based on the limited direct and indirect effects of this action, it is not anticipated that there would be cumulative (adverse) effects to the potentially eligible historic properties on the Forest resulting from of the Proposed Action.

Other Topics

Topics where meaningful effects are not expected, and therefore will not need detailed effects analysis include:

Conflicts with Objective of other Land Management Plans, Policies, and Controls:

The Willamette National Forest has coordinated with the Deschutes, Umpqua, and Mount Hood National Forests to assure that roads connecting the Forests are designated consistently across Forest lines. County roads going through the WNF will remain open to motorized use.

Short-Term Uses and Long-Term Productivity:

The use or protection of natural resources for long-term, sustained yield is the legislated basis of management and direction for the US Forest Service (USDA, USDI 1994). This project is an administrative action. There is no short-term use or ground disturbing action. We expect that the potential for a long-term gain in productivity of forest soils may result by implementing this action. The action would also allow for the long-term development of late-successional habitat and improvement of watershed function.

Unavoidable Adverse Effects

Implementing any alternative would result in some adverse effects that cannot be avoided. The Proposed Action to prohibit wheeled motorized travel off of the designated system of roads and trails could be considered an adverse consequence to some motorized visitors.

Irreversible Resource Commitments

Irreversible commitments of resources are actions that disturb either a non-renewable resource (for example, heritage resources) or other resources to the point that they can only be renewed over 100 years or not at all. There are no irreversible resource commitments with any of the alternatives.

Irretrievable Commitment of Resources

An irretrievable commitment is the loss of opportunities for producing or using a renewable resource for a period of time. There are no irretrievable commitments of resources with any of the alternatives.

Timber Vegetation:

Timber vegetation (i.e., forest trees) is little affected by motor vehicle use. The forest as a whole is not affected in any meaningful way by the implementation of the Proposed Action.

Forest Fuels:

Forest fuel refers to dead or live vegetation that may be consumed by a fire. Forest fuels may be moved or displaced by motor vehicle use, but the quantity and arrangement of forest fuels would be little affected, whether the Proposed Action is implemented or not.

Air Quality:

Motor vehicles produce exhaust emissions and create air-borne dust when operated on dry road, trail, or soil surfaces. However, dust and vehicle exhaust in the Forest environment is usually localized in extent, short-lived, and well-dispersed within a large airshed area. Because the total number of motor vehicles operating on the National Forest is not expected to change as a result of the decision to amend the Forest Plan, the quantity of vehicle exhaust and dust is very small at the airshed scale, and there is not expected to be any meaningful difference between the alternatives, air quality effects are very limited and are not important in the decision to be made.

Visual Quality:

Motor vehicle use has little impact on overall visual quality. There may be localized visual impacts resulting from damaged vegetation or exposed soil, but these are isolated, localized impacts. It is recognized that where motor vehicle use turns a green meadow into a mud bog, the visual impact is severe at that location.

Under the No Action alternative these visual impacts to could continue in Management Areas, and the ability of Law Enforcement to prosecute violators would continue to be limited. The Proposed Action would reduce or eliminate impacts associated with motor vehicle use that damages vegetation or soils by prohibiting cross-country use and allowing motorized access to dispersed campsites only on existing routes.

Economics: Participation in motorized and non-motorized recreation activities has the potential to impact local economies (ex: Lindenberg, 2009). The Proposed Action may result in limited changes to where people drive their motor vehicles on the Willamette National Forest, but it is not expected to have any meaningful effect on how many people use the National Forest for motorized recreation, or how many days they spend recreating on the National Forest. Nor is it expected to affect the use patterns of non-motorized visitors. Therefore, there would be no meaningful economic impact to local communities associated with the Forest Plan amendment or the identification of designated access zones.

See page 8 of the Introduction for a discussion of costs associated with implementation of the Proposed Action.

Unique Characteristics of the Geographic Area:

Forest Service Handbook 1909.15, 05 identifies areas such as historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas as examples of areas that may contain unique characteristics.

Historical and Cultural Resources: Effects to historic or cultural resources are discussed on pages 50-54. None of the proposed actions would affect known prehistoric or historic sites. As outlined in the American Indian Religious Freedom Act, no effects are anticipated on American Indian social, economic, subsistence rights, or sacred sites.

Prime Farmland, Rangeland, Parkland, Forest Land, Wetlands and Flood Plains: Agency direction in the Forest Service Handbook 1909.15, 65.21 is concerned primarily

with conversion of prime farmland, rangeland, parkland, and forest lands to other land uses. Because this forest plan amendment would not result in any farmland, rangeland, parkland, or forest land conversion to other land uses, discussion of effects to prime lands is not needed. No adverse effects on wetlands and flood plains are anticipated.

Wild and Scenic Rivers: The Willamette National Forest contains several Wild and Scenic Rivers congressionally designated as Wild, Scenic, or Recreation. The prohibition of cross-country wheeled motorized travel would protect and enhance the Outstandingly Remarkable Values described for each river in its WSR Plan. The WNF would now have the MVUM and associated CFR to make it easier for the public to comply and more efficient for Law Enforcement. The Proposed Action would minimally affect WSR qualities.

Research Natural Areas: Research Natural Areas are present on the Willamette National Forest. Travel off of the designated system of roads and trails is not currently allowed in the Forest Plan (Management Area 4). Prohibition on cross-country use would remain the same in the No Action alternative and the Proposed Action. Motorized access to dispersed campsites would be provided only through the use of designated system roads under the Proposed Action and the No Action alternatives.

Inventoried Roadless Areas: Inventoried Roadless Areas are “other areas” that may be considered to have “unique characteristics.” Inventoried Roadless Areas located on the Willamette National Forest contain approximately 45 miles of system road. Under the No Action alternative and the Proposed Action, existing system roads within Inventoried Roadless Areas currently open to motor vehicle use would remain open. Under the Proposed Action, motorized access to dispersed campsites would be provided through designated system routes only.

It should be noted that use or presence of motor vehicles does not affect whether an area meets the criteria for inventory as “potential wilderness”. Neither the No Action alternative nor the Proposed Action would have any effect on these roadless/potential wilderness characteristics. The effect of reducing use of motor vehicle off of roads would not be on the area’s classification, but on some people’s expectations for solitude, quiet, etc. in inventoried roadless areas.

Environmental Justice/Civil Rights:

Environmental Justice means that, to the greatest extent practicable and permitted by law, all populations are provided the opportunity to comment before decisions are rendered on, are allowed to share in the benefits of, are not excluded from, and are not affected in a disproportionately high and adverse manner by, government programs and activities affecting human health or the environment (USDA, 1997). In examining the Proposed Action, the environmental effects, and public comments received, there is no indication of any disproportionately high or adverse effect to Indian tribes, low income populations, or minority populations.

The Civil Rights Act of 1964 prohibits discrimination in Federal program delivery, employment, and housing. It is the policy of the Forest Service that the Responsible Official review Proposed Actions for civil rights impacts, and either prepare a civil rights impact analysis and statement of its findings for any proposed policy or organizational action which may have a major civil rights impact, or document the determination that a civil rights impact analysis and a statement of findings are not needed.

Review of the Proposed Action, the environmental effects, and the responses to scoping indicate no disproportionate impacts to women, minority groups, or low income people, and no major civil rights or social impacts associated with the Proposed Action. Therefore, a civil rights impact analysis and statement of findings are not required.

Access for People with Disabilities:

The Proposed Action would not infringe on people's rights to access Forest Lands. Under the Proposed Action, motorized access will be retained for the entirety of the general public on designated system roads and trails, as well as on existing routes in dispersed camping zones. Closed roads and cross-country travel opportunities will remain open to people in wheelchairs, equestrians, pedestrians, and bicyclists.

Consistent with 36CFR212.1, FSM2352.05, and Title V, Section 507(c), of the ADA, wheelchairs and mobility devices, including those that are battery-powered, that are designed solely for use by a mobility-impaired person for locomotion and that are suitable for use in an indoor pedestrian area are allowed on all NFS lands that are open to foot travel. There is no legal requirement to allow people with disabilities to use motor vehicles on roads, on trails, and in areas that are closed to motor vehicle use. Restrictions on motor vehicle use that are applied consistently to everyone are not discriminatory. Future decisions to close roads, under separate NEPA, will address how to install closure devices that allow for passage by wheelchairs.

Access for Mining:

The United States Mining Laws, as Amended, are an integral part of managing National Forest System (NFS) lands. However, miners' rights to conduct mineral operations on NFS lands are not absolute and the Forest Service has authority to establish reasonable regulations to protect NFS lands, including means of access. The Proposed Action does not make any determination as to any person's right to prospect or explore for locatable minerals or to conduct locatable mineral operations. To the contrary, the Proposed Action merely proposes to designate those National Forest System (NFS) roads and trails on NFS lands that will be managed as "open" to motor vehicle use.

Public Health and Safety:

Motor vehicle use, including use of non-highway-legal vehicles (e.g., motorcycles, 4-wheel all-terrain vehicles) is presently occurring on roads, trails, and in some cases, off of roads and trails. There are certain public safety risks associated with motor vehicle use on forest roads due to factors such as: limited sight distances; roads that are not signed for curves or speed limits; uneven travel surfaces; and natural hazards (e.g., rocks, fallen trees, or fallen branches). Factors that increase safety risk when non-highway-legal

vehicles are using roads include: increased volume of traffic on roads; mixed traffic on roads; possible presence of unlicensed or under-aged drivers on roads; possible disregard for speed limits or other traffic safety rules. Currently, non-highway licensed vehicles are allowed on any gravel roads that are less than 1.5 lanes in width, according to Oregon State rules.

As part of the process of designating roads where non-highway-legal vehicles are allowed, the Willamette National Forest is conducting a Motorized Mixed Use Analysis. This process examines the public safety hazards associated with mixed use on all roads considered for use by non-highway-legal vehicles, and the findings are considered in the decision whether to open a route to mixed use, as well as to identify appropriate mitigation measures for safety. This process is expected to reduce, but not eliminate, the public safety risk associated with opening up a road to non-highway-legal motor vehicle use.

The Mixed Use Analysis is not included as part of this NEPA analysis; which roads to designate for motorized mixed use is an administrative decision to provide for public safety. There are no risks to public health or safety associated with the implementation of the Proposed Action.

CHAPTER 4

CONSULTATION WITH OTHERS

INTRODUCTION

The following is a summary of Forest Service consultation with individuals, Federal, state and local agencies, tribes and non-Forest Service persons during the development of this environmental assessment.

INTERDISCIPLINARY TEAM

Interdisciplinary team: The members of the interdisciplinary team involved in the creation of this environmental analysis are as follows:

Table 6: Travel management Interdisciplinary Team

Role	Staff
Deciding Official	Scott Fitzwilliams
<i>Core Team</i>	
IDT Leader	Ryan Brown
Recreation (OHV) specialist	Wendy Zustiak
Engineering specialist	Palmer Utterback
Planning specialist and SRZ rep	Rich Hatfield
<i>Extended Team</i>	
Staff support	Stacey Forson, Doris Tai
Public affairs	Judith McHugh, Elaine Bernat
GIS support	Rosanna Costello (lead), Jeremy Hobson (MVUM lead), Ed Hall (business area lead), Mike Gebben, Stan Wedekind, Carol Boyd
Cartographic support	Cathy McGrath
Recreation specialists (district)	Steve Otoupalik, Brad Peterson, Brian McGinley
Engineering specialists (district)	Dawn Pozzani, Kenny Gabriel, Steve Sappington, Alan Andrews
Law Enforcement specialist	Joe Fletcher
Minerals specialist	Robb Ginn
Recreation specialist	Stacey Forson
Terrestrial specialist	Joe Doerr
Aquatics specialist	Corey Lewellen
Botany specialist	Jennifer Lippert
Heritage specialist	Cathy Lindberg
NEPA specialists	Suzanne Schindler, Gary Marsh (lead), Brian McGinley

AGENCY CONSULTATION

The Willamette National Forest received comments from the US Army Corps of Engineers during the public scoping process in support of eliminating motor vehicle use of reservoir beds.

Consultation with State Historic Preservation Office was not required, as this plan is programmatic in scope and does not include an element of ground disturbance. Consultation with the US Department of Fish and Wildlife was not required, as the designated transportation system identified in the Proposed Action represents the baseline. Designation decisions are administrative, and only incorporate roads and trails currently on the Forest Service system; this does not represent a Federal agency action under the Endangered Species Act.

TRIBAL CONSULTATION

Timeline of involvement with Tribes:

- 2/5/2008: Overview of process and offer of meeting to the Confederated Tribes of Grand Ronde
- 2/20/2008: Met with representatives of the Confederated Tribes of Grand Ronde to provide an overview of the process, get general feedback and share maps.
- 3/11/2008: Overview of process and offer of meeting to the Confederated Tribes of Warm Springs and Confederated Tribes of Siletz Indians
- 4/10/2008: Met with representatives of the Confederated Tribes of Siletz Indians during the annual program of work meeting to provide an overview of the proposal, get general feedback and share maps.
- 7/29/2008: Met with representatives from the Natural Resources Department of the Confederated Tribes of Warm Springs to provide an overview of the proposal, get general feedback and share maps.
- 3/6/2009: Draft consultation letter for input sent to representatives Confederated Tribes of Warm Springs, Confederated Tribes of Grand Ronde, and Confederated Tribes of Siletz Indians.
- 3/16/2009: Official consultation letter sent to the Klamath Tribes, the Confederated Tribes of Warm Springs, the Confederated Tribes of Siletz Indians, and the Confederated Tribes of Grand Ronde
- 3/19/2009: Met with representatives of Confederated Tribes of Siletz Indians to discuss Proposed Action
- 3/20/2009: Met with representatives of Confederated Tribes of Grand Ronde to discuss Proposed Action
- 6/25/09: Met with representatives of Confederated Tribes of Warm Springs to discuss the Proposed Action.

PUBLIC INVOLVEMENT

9/10/2007: The Willamette National Forest engaged the public for the first time, giving them an overview of the Rule implementation process and inviting them to review maps and help the FS complete their inventory of places where people use motor vehicles to access the Forest. Outreach included a mailing to more than 400 addresses, a press release, putting posters in businesses that sell to the OHV community, a webpage with current information, and posting the working maps in the front offices at Detroit, Sweet Home, McKenzie and Middle Fork Ranger Districts, as well as the Supervisors Office in Eugene. The mailing list for this process was comprised of individuals, organizations and governmental entities included on the Willamette National Forest NEPA mailing list and mailing lists from the Santiam Pass OHV and Huckleberry Flat OHV Trail planning efforts. Interested individuals were added to the mailing list upon request.

A total of 60 comments were received. A meeting was held upon request with a representative from the American Hiking Society on 11/6/2007.

8/12/2008: The public was invited to comment on the overall strategy the Willamette National Forest proposed to implement the Rule. The outreach included a mailing to 471 addresses, a press release, updating the webpage with current information. A total of 10 comments were received, and a meeting was held upon request with representatives of the American Hiking Society, Oregon Wild and Cascadia Wildlands Project on 12/9/2008. The Willamette National Forest used the comments received during pre-scoping to develop and refine the Proposed Action.

3/16/2009: The Proposed Action was provided to the public and other agencies for comment during a scoping period (36CFR215.5) from March 16th, 2009-April 15th, 2009. The scoping letter was sent to the Forest's Travel Management mailing list (463 addressees), the website was updated with current information, and a press release was released.

A total of 85 comments were received (See Table 3 in Appendix B for a list public comments received). Many of these were in response to the mailing; however a number of commenters said they had read an article published in the Eugene Register Guard (3/31/2009) which gave an overview of the travel management designation process and highlighted other road closure efforts occurring on the Forest. The Forest and District received calls and emails immediately following the newspaper article from people who were concerned that their road access would be restricted through this process. Many people became less concerned about the travel management planning process after discussing the issues with staff. Several folks asked to be notified about future road closures.

The Proposed Action was presented upon request to the Capitol Chapter (4/16/2009) and the Emerald Chapter (5/11/2009) of the Oregon Hunter's Association.

The Proposed Action has been listed in the Schedule of Proposed Actions since 10/1/2007.

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Appendix A: Glossary of Terms

Closed roads: Road closures are not defined in great deal in the Forest Plan. In actuality, closed roads on the Willamette National Forest refer to a variety of different situations which result in partial or complete blockage of access. Roads can be closed seasonally, usually with a gate. Roads can be closed physically through the installation of gates, burms or other barriers, or through decommissioning. Roads are generally closed through the NEPA process, and an administrative order restricting public access is required for citations to be written for violating the closure.

Cross-country motorized travel: Motor vehicle travel off of a designated system of roads and trails; off of the existing road surface or established path of the trail.

Designated Access Zone: an element of the Proposed Action to allow continued motorized access to dispersed campsites in appropriate areas. Within each designated access zone, motorized travel will be allowed off of the designated system road for the purpose of entering and exiting dispersed campsites within 300' of centerline of the designated system road. Travel in these zones will **only** be allowed along existing routes to existing campsites.

Designated road, trail or area: A National Forest System road, a National Forest System trail, or an area on National Forest System lands that is designated for motor vehicle use pursuant to Sec. 212.51 on a motor vehicle use map. (USDA Forest Service, 2005)

Dispersed campsite: an undeveloped campsite with no services provided by the Forest Service that is used by the public for camping.

Existing campsite (in a designated access zone): an area obviously used by campers that usually contains a rock fire ring and minimal ground vegetation as the result of motor or foot traffic.

Existing Route (in a designated access zone): A route with an established history of passenger vehicle use, as indicated by a road-bed width of greater than 50 inches, the predominance of compacted soil, and minimal vegetation growing in the travel way. New resource impacts (indicated by single or double tracks through vegetation) are **not** considered existing routes.

Forest Plan Management Areas (MA): This is a term used in the Forest plan to identify areas with similar management objectives and common management prescription.

Hardened: Refers to a surface which has been intentionally made more durable to withstand use by motor vehicles without causing damage to soil, vegetation or water. In this case, it refers to existing surfaces including turnouts, pullouts, quarries, and landings that are located adjacent to designated routes. These hardened sites have no distinct

access routes and will be considered part of the road prism, allowing for motorized access.

Motorized Mixed Use (MMU): Refers to the use of a road by both street-legal and non-street legal (OHVs) vehicles.

Motorized Mixed Use Analysis (MMUA): A qualitative analysis of road characteristics completed by a qualified engineer for each road to be considered for mixed use through the travel management process.

Motor Vehicle: Any vehicle which is self-propelled, other than: (1) A vehicle operated on rails (over-snow vehicles); and (2) Any wheelchair or mobility device, including one that is battery powered, that is designed solely for use by a mobility-impaired person for locomotion, and that is suitable for use in an indoor pedestrian area. (USDA Forest Service, 2005)

Motor Vehicle Use Map (MVUM): A map reflecting designated roads, trails, and areas on an administrative unit or a Ranger District of the National Forest System. (USDA Forest Service, 2005)

Mudding: an illegal activity in which a motor vehicle drives off of an existing route, onto a wet meadow or other wet area containing vegetation, resulting in significant damage to the vegetation and soil. Mudding areas often require active restoration efforts.

Off-Highway Vehicle (OHV): Any motor vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain. The Rule applies to wheeled, motorized vehicles only (does not include over-snow vehicles).

The State of Oregon considers all vehicles intended for off-highway use to be All-terrain Vehicles (ATV). They are broken into three classes, as listed below for reference. For our purposes, the term OHV will be used.

- *Class I:* Quads, 3-wheelers; Vehicles 50 inches wide or less, and dry weight of 800 pounds or less; has a saddle or seat, and travels on 3 or more tires.
- *Class II:* Jeeps, sand rails, SUVs; Vehicles wider than 50 inches and dry weight more than 800 pounds.
- *Class III:* Motorcycles; Vehicles on two tires, dry weight less than 600 pounds.

Off-Road Vehicles (ORV): This is the term used in the Forest Plan, referring to vehicles such as motorcycles, all-terrain vehicles, four-wheel drive vehicles (OHV in this document), and snowmobiles (over-snow vehicles in this document).

Operational Maintenance Level 1 Roads (Operational ML1): Assigned to intermittent service roads during the time they are closed to vehicular traffic. The closure period must exceed 1 year. Basic custodial maintenance is performed to keep damage to adjacent resources to an acceptable level and to perpetuate the road to facilitate future

management activities. Emphasis is normally given to maintaining drainage facilities and runoff patterns. Planned road deterioration may occur at this level. Roads receiving Level 1 maintenance may be of any type, class, or construction standard, and may be managed at any other maintenance level during the time they are open for traffic. However, while being maintained at level 1, they are closed to vehicular traffic, but may be open and suitable for non-motorized uses.

Over-snow vehicle: A motor vehicle that is designed for use over snow and that runs on a track or tracks and/or a ski or skis, while in use over snow. The Rule does not address over-snow vehicles. They continue to be managed as “open unless designated as closed.”

Programmatic planning: This type of analysis is required by the National Environmental Policy Act (NEPA) when proposing changes in land management strategy that will apply to multiple or large areas. In this case, NEPA requires a programmatic approach to make a change to the Forest Plan, which effects the management situation on the entire Forest.

Road: A motor vehicle route over 50 inches wide, unless identified and managed as a trail. (USDA Forest Service, 2005)

Site-specific planning: This type of analysis is required by the National Environmental Policy Act (NEPA) for specific activities to be implemented in one location (such as timber sales, trail or road construction or decommissioning, etc). This document does not propose any site-specific changes.

Trail: A route 50 inches or less in width or a route over 50 inches wide that is identified and managed as a trail. (USDA Forest Service, 2005)

2005 Travel Management Rule (the Rule): This term refers to the Final Rule entitled “Travel management; Designated routes and Areas for Motor Vehicle use” published in the Federal Register, Volume 70, Number 216, Wednesday, November 9th, 2005. The 2005 Travel Management Rule revised Forest Service regulations regarding travel management on National Forest System lands in the Code of Federal Regulations, Title 36, parts 212, 251, 261, and 295.

Appendix B: Public Comments and Analysis

Table 1: Non-significant Issues Addressed in Travel Management EA

Issue	Forest Service Response	Addressed in EA
<p>Adequacy of trail system to provide for motorized recreation demand.</p>	<p>The WNF provides a wide variety of opportunities for different types of recreation. Recent additions to the motorized trail system include Santiam Pass and Huckleberry Flat OHV areas.</p> <p>A capacity analysis of the recreation opportunities is not within the intended scope of the Purpose and Need. Additional needs for motorized opportunities will continue to be analyzed through a separate planning process as brought to the FS by citizen proposals.</p>	<p>Chapter 3; Motorized Recreation, p 27-28, 32-34</p>
<p>Potential for resource impacts in dispersed camping designated access zones, especially in sensitive areas including riparian areas, Inventoried Roadless Areas, designated Wilderness, Research Natural Areas, and management areas designated as semi-primitive non-motorized in the Forest Plan.</p>	<p>Riparian areas contain the most popular campsites on the WNF, and restricting motorized access in these areas would not meet the Purpose and Need. Motorized access to these campsites will continue to be managed on a site-specific basis in response to individual resource issues, such as has been done on the Detroit and Sweet Home Ranger Districts with the Respect the River program.</p> <p>Designated access zones are proposed along 464 miles of road that access dispersed campsites within riparian areas. Motorized access to dispersed campsites located within congressionally designated Wilderness, Inventoried Roadless Areas, semi-primitive non-motorized areas and research natural areas will be allowed through the use of system roads only.</p>	<p>Chapter 1; Project Implementation, p 8-11</p> <p>Chapter 2; Alternatives considered but eliminated from detailed study, p 12-13 and Proposed Action, p 21-22</p>
<p>Adequacy of access to motorized dispersed camping opportunities.</p>	<p>Access to most dispersed campsites (90-95%) will be retained through this process. Providing motorized access to dispersed campsites is a work in progress and will continue to be improved over time. Changes in access will be displayed on future iterations of the MVUM.</p> <p>In some cases, database corrections may be made to allow motorized use in places where it is currently occurring and appropriate. Site specific planning processes may also be used to add some routes to the designated motorized system of roads and trails. Non-motorized access will still be allowed to all dispersed campsites unless specifically closed.</p>	<p>Chapter 3; Motorized Recreation, p 30-31, 34-37</p>

Issue	Forest Service Response	Addressed in EA
<p>Compatibility of Proposed Action with the 1866 Mineral Estate Trust Grant Act and RS 2477.</p>	<p>The United States Mining Laws, as Amended, are an integral part of managing National Forest System (NFS) lands. However, miners' rights to conduct mineral operations on NFS lands are not absolute and the Forest Service has authority to establish reasonable regulations to protect NFS lands, including means of access. The Proposed Action does not make any determination as to any person's right to prospect or explore for locatable minerals or to conduct locatable mineral operations. To the contrary, the Proposed Action merely proposes to designate those National Forest System (NFS) roads and trails on NFS lands that will be managed as "open" to motor vehicle use. Revised Statute (R.S.) 2477 rights-of-way are for public highways under the jurisdiction of state, county, or local public road authorities.</p> <p>The Proposed Action does not involve closing any existing open roads on the Willamette National Forest and moreover, the Proposed Action does not include any roads, trails or lands managed by any state, county or local authorities. At present, there are no adjudicated RS 2577 roads within the Willamette National Forest.</p>	<p>Chapter 3; Other Topics, p 60</p>
<p>Adequate protection of natural quiet, sufficient opportunities for non-motorized recreation, and further reduction of user conflicts.</p>	<p>The WNF provides a wide variety of opportunities for different types of recreation. In addition to the opportunities for solitude offered by designated Wilderness (23% of forest acres, and 580 miles of trail), 95% of total trail miles are managed exclusively for non-motorized use (approximately 60% of non-Wilderness trails). The implementation of this project may increase opportunities for experiencing natural quiet through the prohibition of cross-country use on all Forest acres, and the official closure of Operational ML1 roads. The MVUM represents a clear tool for showing the public where they are allowed to drive motor vehicles; an increase in compliance is expected.</p> <p>Some comments identified user conflicts (safety considerations and impacts to natural quiet) associated with trails designated for both motorized and non-motorized users (hikers, equestrians, mountain bikers), and with the interaction of trails and dispersed campsites accessed via motor vehicle. These concerns should be addressed on a situation specific basis, as a programmatic approach (such as this analysis) will not serve to address these questions well.</p> <p>A capacity analysis of the recreation opportunities is not within the intended scope of the Purpose and Need. Additional needs for non-motorized opportunities and the resolution of user conflicts will continue to be analyzed through separate planning processes as brought to the FS by citizen proposals.</p>	<p>Chapter 2; Alternatives considered but eliminated from detailed study, p 12-13</p> <p>Chapter 3; Non-motorized Recreation; p 37-39</p>

Issue	Forest Service Response	Addressed in EA
Compatibility of the Proposed Action with Executive Orders 11644 and 11989 (cited in the Rule)	The compatibility will be addressed in the EA for this project. The prohibition of cross-country motorized travel is highly compatible with the Executive Orders identified here. The designation of non-motorized Management Areas in the Forest Plan and the ongoing efforts of the Willamette National Forest to protect natural resources through the closure of certain roads to motorized travel is also compatible with these orders; though this is outside the scope of the project.	Chapter 1; Applicable Laws, Regulations, Planning Documents and Analyses, p 6 Chapter 3; Non-motorized Recreation, p 38
Compatibility of Proposed Action with NHPA requirements to consider visual and auditory affects to cultural resources	Management of auditory impacts to important properties is addressed in the Forest Plan and Special Interest Area guides or are dealt with on a case by case basis. Visual impacts to important properties are not an issue in this project, because the Proposed Action does not include actions that would impact visual quality.	Chapter 3; Heritage, p 55-56
Designation of routes for motorized use that overlap historical linear features (wagon roads, etc)	<p>The EA will not address the impacts of designated system roads and trails on the historical linear features. Linear features will only be designated as part of the transportation system if they are currently designated as system roads or trails. If a road is currently on the system, then an analysis has been completed to determine that motorized use is appropriate.</p> <p>Motorized travel along these linear features (off of the designated system) will no longer be allowed, except in designated dispersed camping access zones. Appropriate motor vehicle designation and management actions have been analyzed and implemented (road designations and route closures) for major historic routes that could be used to access campsites in designated access zones. Protection of other smaller or less well known historic routes are dealt with on a case by case basis.</p>	Chapter 3; Heritage, p 55-56
Costs associated with the implementation of each alternative	It is not expected that the implementation of the Proposed Action will result in a great cost to the government. Initial printing costs for maps will be approximately \$15,000-\$20,000. An additional \$50,000 has been acquired to improve the road number signage at intersections to make the maps readable; maintenance of these signs will be needed. Enforcement of the rule will be more efficient with the use of the MVUM for public education and as an enforcement tool.	Chapter 3; Other Topics, p 57

Issue	Forest Service Response	Addressed in EA
<p>Systematic designation of a minimum transportation system for motor vehicles and OHVs to protect all natural and cultural resources</p>	<p>This suggestion is outside the scope of the Purpose and Need for this project. This planning process is programmatic in nature, and allows for separate, site-specific planning processes to continue making determinations based on the considerations listed above. The requirement to complete a comprehensive travel analysis will be met through a separate planning process and is not required to produce the initial MVUM showing the designated travel system.</p> <p>The number of miles of existing system roads to be designated in IRAs (44.8) and semi-primitive non-motorized (6.4) will be disclosed in the EA</p>	<p>Chapter 2; Alternatives considered but eliminated from detailed study, p 12-13</p>
<p>Disturbance of important habitat associated with OHV trail designation and the need to coordinate with ODFW</p>	<p>The WNF is not proposing to change the management of any trails to add motorized use. Motorized use will only be designated on trails where existing management currently allows it.</p> <p>Recent advice from Region 6 officials states, "Designation of routes, trails and areas decided by previous administrative decisions through publication of a Motor Vehicle Use Map (MVUM), where no NEPA is required (36 CFR 212.50), does not constitute either a major Federal action under NEPA nor a Federal agency action under the ESA. Designation is considered to be purely an administrative action mapping an existing situation in which decisions have been implemented and the environmental consequences have already occurred. Designation, therefore, has no environmental consequences that can be meaningfully evaluated (40 CFR 1508.14)."</p>	<p>Chapter 4; Agency Consultation, p 62</p>
<p>Motorized access for game retrieval on ML1 roads and cross-country</p>	<p>The Regional Forester reserved the decision to allow or disallow big game retrieval off of the designated system of roads and trails. In Region 6, the RF decided not to allow exceptions for this purpose. Because of this, the EA will analyze the effects of the change on hunters. It is important to note that the WNF also received indication when visiting OHA meetings that some hunters support the closure of some roads to improve the hunting areas.</p>	<p>Chapter 3; Motorized Recreation, p 28-37</p> <p>Chapter 3; Non-motorized Recreation, p 38</p>

Issue	Forest Service Response	Addressed in EA
<p>Public access on Operational Maintenance Level 1 roads</p>	<p>As a national standard, Operational ML1 roads will not be designated as open to the public. Operational ML1 roads reflect a maintenance condition that is not drivable; they have either been stored in a condition where they can withstand the weather without causing resource damage, or nature has closed them.</p> <p>The WNF is continually in the process of correcting and updating the Operational Maintenance Level database as conditions warrant. In some cases, roads may be receiving active use and are more appropriately classified as Operational ML2 and changes are made in the database if it is appropriate to do so.</p> <p>Operational Maintenance Level is an administrative classification based on road conditions. It is determined by WNF engineers. It is not a requirement to go through the NEPA process to assign Operational Maintenance Levels.</p>	<p>Chapter 3; Motorized Recreation, p 29</p>
<p>Motorized access for people with disabilities.</p>	<p>Motorized access will be retained for the entirety of the general public on designated system roads and trails, as well as on existing routes in dispersed camping zones. Closed roads and cross-country travel opportunities will remain open to people in wheelchairs, equestrians, pedestrians, and bicyclists.</p> <p>“Consistent with 36CFR212.1, FSM2352.05, and Title V, Section 507(c), of the ADA, wheelchairs and mobility devices, including those that are battery-powered, that are designed solely for use by a mobility-impaired person for locomotion and that are suitable for use in an indoor pedestrian area are allowed on all NFS lands that are open to foot travel... There is no legal requirement to allow people with disabilities to use motor vehicles on roads, on trails, and in areas that are closed to motor vehicle use. Restrictions on motor vehicle use that are applied consistently to everyone are not discriminatory.” (Memo from FS Washington Office titled “Travel management and Special Groups”, 12/10/2009)</p> <p>Future decisions to close roads (separate NEPA) will incorporate closure devices allowing for passage by wheelchairs.</p>	<p>Chapter 3; Other Topics, p 59</p>

Issue	Forest Service Response	Addressed in EA
Accommodations of site-specific proposals or requests in the Travel Management planning process.	The Willamette National Forest received some suggestions regarding specific routes or systems of routes to be designated for motorized use during scoping and pre-scoping. Some of these comments fit within the Purpose and Need for this action, while others were site-specific in nature. Those that could not be addressed within the programmatic approach of this analysis were passed along to the line officers on the appropriate districts.	

Table 2: Public Scoping Comments Key

Comment Number	Name	Notes
C1	James R. Delp	Cascade Timber Consulting, Inc. - not representing
C2	Carolyn Kay Harper	
C3	John A. Keyser	
C4	Coons (?)	Return address reads Coons or Coors'
C5	Gary Schroeder	
C6	Martin Winch	
C7	Tony and Cyllene King	
C8	Stephen Weber	
C9	Bob and Sue Ballenger	
C10	Karen Sjogren	
C11	Clarence F. Nunn	
C12	Dennis B. Mills	
C13	Jim L. Essman	
C14	Edwin Johnson	
C15	David Lawson	
L1	Milt Moran	
L2	Eric L. Bewley	
L3	Jean B. Clancey	
L4	Tom Quintal	
L5	Annette Parsons	
L6	Raye Bratton	
L7	Rick Bronson	
L8	Stephen Long	
L9	Pete Warren	
L10	Ricky John	e-mail address is only name associated, reads 'RRickyJohn@aol.com'
L11	Donald A. Waddell	
L12	C.E. Whitten	
L13	Bob Zybach	
L14	Susie Fagen-Wirges	
L15	Annonomous	
L16	Joe Frankel	
L17	Dr. Luci Kovacevic	
L18	Fred Shipley	Oregon Mycological Society
L19	Larry Marr	
L20	Robert Wilson	
L21	Jim Davidson and Melba Davidson	
L22	Stephanie Smith	
L23	Betty Jean Keele	
L24	Tim Nidever	
L25	Don Alle n	Sand Mountain Society
L26	Tyler Wood, Marian Petrash	

Comment Number	Name	Notes
L27	Randy Rasmussen, Josh Laughlin, Glenn Harrison, Asante Riverwind, Doug Heiken, Tim Nidever, Bob Freimark, Keith F. May, Richard Spray, Wendell Baskins	American Hiking Society, Cascadia Wildlands Project, Linn County Historical Society, Oregon Chapter Sierra Club, Oregon Wild, Sand Mountain Society, The Wilderness Society
L28	Sherry Canfield	
L29	Dana Berthold	Pacific Crest Trail Association
L30	Todd Matz, Michele Matz	
L31	Joe Ricker	
L32	Seth Webb	
L33	David McClurg	
L34	David Lawson	
L35	Ethan Lodwig	
L36	Bryan Bagwell	
L37	Mike Sheetz	
L38	Colby Stephens	
L39	Richard Pratt	
L40	Reed Winkle	
L41	Bill Mullen	
L42	Dan Starner	
L43	Anna Jenkins	
L44	Greg Ripley	
L45	Darrol D. Gesh	
L46	Thomas William Baxter, Sherrie Annette Sims, Shelby Quinn Camerer, Grace Baxter, Robert Parker, Debra Beers, Glenn Maltby, Lawrence Birch, Tanya Vabloudil, Monte Stewart, Cecelia Baxter, Nathan Wharram, Ryland Wharram	
L47	Andy Lanier	
L48	Larry Ballard	
L49	William McCoy	
L50	Jerry Thomasson	
L51	Ted W. Anderson	Rocky Mountain Elk Foundation
L52	Erik S. Petersen	Department of the Army Corps of Engineers
L53	Wendell Baskins	Oregon Historic Trails Advisory Council
L54	Ric Foster	Blue Ribbon Coalition
L55	Becky and Matt Hope	
L56	Doug Bratten	
P1	Ross Smith	
P2	Paul Slaven	
P3	Gene Tomlin	
P4	John Tena and Denver Hylemon	
P5	Gene Altemus and Herb Hilton	
P6	Mike Wilson	
P7	Mark Rimer	
P8	Lee Williamson	
P9	Charolette Rice	

Comment Number	Name	Notes
P10	Larry Turpin	
P11	Tony Hilfendanger	
P12	David Monett	
M1	Members	Oregon Hunter's Association - Capitol Chapter and Cascade Crawlers
M2	Members	Oregon Hunter's Association - Emerald Chapter

Table 3: Public Scoping Comments Received and FS Response

Letter number	Subject of concern	Comment	Forest Service Response
		Need Further Analysis	These comments will be reviewed when developing the issues section of the EA
L39*	Elderly and Disabled	Taking away motorized access is discrimination against elderly or disabled people.	<p>Motorized access will be retained for the entirety of the general public on designated system roads and trails, as well as on existing routes in dispersed camping zones. Closed roads and cross-country travel opportunities will remain open to people in wheelchairs, equestrians, pedestrians, and bicyclists.</p> <p>“Consistent with 36CFR212.1, FSM2352.05, and Title V, Section 507(c), of the ADA, wheelchairs and mobility devices, including those that are battery-powered, that are designed solely for use by a mobility-impaired person for locomotion and that are suitable for use in an indoor pedestrian area are allowed on all NFS lands that are open to foot travel... There is no legal requirement to allow people with disabilities to use motor vehicles on roads, on trails, and in areas that are closed to motor vehicle use. Restrictions on motor vehicle use that are applied consistently to everyone are not discriminatory.” (Memo from FS Washington Office titled “Travel management and Special Groups”, 12/10/2009)</p> <p>Future decisions to close roads (separate NEPA) will incorporate closure devices allowing for passage by wheelchairs.</p> <p>See Ea Chapter 3; Other Topics; Access for People with Disabilities, p 59</p>
L49	Elderly and Disabled	People with disabilities will no longer have the same opportunity to access the forest as those who can walk. This is a violation of ADA.	See response to L39*
C5	Elderly and Disabled	Any rules with unintended restrictions to disabled people are unacceptable	See response to L39*
C9	Elderly and Disabled	I and my senior friends use quads to recreate on the forest. More trails are needed.	See response to L39*

Letter number	Subject of concern	Comment	Forest Service Response
C10	Elderly and Disabled	Increase access areas for people with limited mobility to explore the forested environment without being in a car (viewpoints, etc).	See response to L39*
P10	Elderly and Disabled	Hunting access should be retained for disabled people.	See response to L39*
P11, P12	Elderly and Disabled	Keep roads open for people with disabilities or the elderly	See response to L39*
L54	Misc. Comments on Proposed Action	Verbiage in P&N emphasize negative and limiting aspects of Rule pertaining to OHVs, and does not acknowledge the intent of the Rule to provide opportunities for motorized recreation	The Purpose and Need for this project was identified based on local conditions and considerations. The WNF offers opportunities for motorized recreation which are appropriate to continue. However, this planning process is programmatic in scope; site specific proposals for the designation of areas will be dealt with at the district level through separate planning processes.
L54	Misc. Comments on Proposed Action	Verbiage of Proposed Action should include 'roads, trails and AREAS' when directly referring to the Rule to provide an accurate portrayal of its intentions.	This comment was reviewed when drafting the background section of the EA to show the intent of the Travel Management Rule. The designation of areas does not fit within the Purpose and Need. This planning process is programmatic in scope; site specific proposals for the designation of areas will be dealt with at the district level through separate planning processes. See EA Chapter 1; Background; Travel Management Rule, p 2
L42	Designated system; retain public access	Roads should not be closed to the public because of maintenance reasons	Decisions to close roads are made through site-specific processes, not through this process. The decision not to designate motorized access to Operational Maintenance Level 1 roads was made at a national level. See EA Chapter 3; Motorized Recreation; Motorized Recreation on System Roads, p 28-29; and Proposed Action, p 32-37
C9	Develop OHV Opportunities	17 miles of trails open to quads is inadequate to meet the demand.	The forest has decided for this programmatic analysis to work within the existing road and trail network, and will not be evaluating the carrying capacity of the landscapes for different types of recreation. The WNF manages a diverse trail system with opportunities for non-motorized and motorized users.

Letter number	Subject of concern	Comment	Forest Service Response
L24	Dispersed camping; limit motorized access	Reduce the number of feet for the dispersed camping access zones to 20' to allow a pull-off for walk-in camping	<p>Riparian areas contain the most popular campsites on the WNF, and restricting motorized access in these areas would not meet the Purpose and Need. Motorized access to these campsites will continue to be managed on a site-specific basis in response to individual resource issues, such as has been done on the Detroit and Sweet Home Ranger Districts with the Respect the River program.</p> <p>See EA Chapter 1; Purpose and Need, p 3-4</p>
L24	Dispersed camping; limit motorized access	Current verbiage allowing motorized access for dispersed camping will be difficult for enforcement; violators can claim they are in route to a campsite	<p>It is a national standard that the exception to allow for motorized access off of the designated system of roads and trails exclusively for the purpose of dispersed camping. The resulting CFR will be enforced.</p> <p>See EA Chapter 1; Project Implementation, p 8-11; and Chapter 2; Alternative 2: Proposed Action, p 21-22</p>
L25	Dispersed camping; limit motorized access	Minimize OHV designation in first round to protect natural and cultural resources, especially in dispersed camping areas	<p>Determinations of whether OHVs will be allowed on individual roads are made by District Rangers, based on the results of a safety analysis only. This process does not analyze the effects of OHV use on the road system.</p> <p>See EA Chapter 1; Project Implementation, p 8-11</p>

Letter number	Subject of concern	Comment	Forest Service Response
L27*	Dispersed camping; limit motorized access	Designate dispersed camping access zones sparingly, and only where warranted by site-specific conditions. Do not designate zones in areas adjacent to roadless and wilderness areas, research natural areas, riparian habitat, or other sensitive locations	<p>Riparian areas contain the most popular campsites on the WNF, and restricting motorized access in these areas would not meet the Purpose and Need. Motorized access to these campsites will continue to be managed on a site-specific basis in response to individual resource issues, such as has been done on the Detroit and Sweet Home Ranger Districts with the Respect the River program.</p> <p>Designated access zones are proposed along 464 miles of road that access dispersed campsites within riparian areas. Motorized access to dispersed campsites located within congressionally designated Wilderness, Inventoried Roadless Areas, semi-primitive non-motorized areas and research natural areas will be allowed through the use of system roads only.</p> <p>See EA Chapter 1; Project Implementation, p 8-11; Chapter 2; Alternatives Considered but Eliminated from Detailed Study, p 12-13; and Proposed Action, p 21-22</p>
L27	Dispersed camping; limit motorized access	Adopt restrictions that limit the adverse impacts to wetlands and riparian areas associated with dispersed camping off designated motorized routes (like the Deschutes NF)	See response to L27*
C10	Dispersed camping; limit motorized access	Limit definition of existing route in dispersed camping access zones.	See response to L27*

Letter number	Subject of concern	Comment	Forest Service Response
L30*	Dispersed camping; retain access	Interest in retaining primitive motorized camping opportunities at lakes (not camping in campgrounds or backpacking in)	<p>Access to most dispersed campsites (90-95%) will be retained through this process. Providing motorized access to dispersed campsites is a work in progress and will continue to be improved over time. Changes in access will be displayed on future iterations of the MVUM.</p> <p>In some cases, database corrections may be made to allow motorized use in places where it is currently occurring and appropriate. Site specific planning processes may also be used to add some routes to the designated motorized system of roads and trails. Non-motorized access will still be allowed to all dispersed campsites unless specifically closed.</p> <p>See EA Chapter 3; Motorized Recreation, p 30-37</p>
L30, P5, P11	Dispersed camping; retain access	Access should be retained to campsites located greater than 300' from the road	See response to L30*
L30, C14	Dispersed camping; retain access	Camping close to the road will increase vehicle break-ins and impact the camping experience (increased noise and dust)	See response to L30*
L40	Dispersed camping; retain access	Dispersed camping access zones seem extremely restrictive	See response to L30*
P9	Dispersed camping; retain access	Camp located on non-system spur on rd 1944 750 - not within access zone.	See response to L30*

Letter number	Subject of concern	Comment	Forest Service Response
L4	Mining Interests	Proposal is in direct conflict with 1866 Mineral Estate Trust Grant Act and RS 2477, which allows public access to Domain Lands.	<p>The United States Mining Laws, as Amended, are an integral part of managing National Forest System (NFS) lands. However, miners' rights to conduct mineral operations on NFS lands are not absolute and the Forest Service has authority to establish reasonable regulations to protect NFS lands, including means of access. The Proposed Action does not make any determination as to any person's right to prospect or explore for locatable minerals or to conduct locatable mineral operations. To the contrary, the Proposed Action merely proposes to designate those National Forest System (NFS) roads and trails on NFS lands that will be managed as "open" to motor vehicle use. Revised Statute (R.S.) 2477 rights-of-way are for public highways under the jurisdiction of state, county, or local public road authorities.</p> <p>The Proposed Action does not involve closing any existing open roads on the Willamette National Forest and moreover, the Proposed Action does not include any roads, trails or lands managed by any state, county or local authorities. At present, there are no adjudicated RS 2577 roads within the Willamette National Forest.</p> <p>See EA Chapter 3; Other Topics; Access for Mining, p 60</p>
C11	Motorized Mixed Use	Coopers Ridge Road and McCoy Creek Road should be open to OHV use, because they are actively used by OHVs and don't get much traffic.	<p>Determinations of whether OHVs will be allowed on individual roads are made by District Rangers, based on the results of a safety analysis. Neither of these roads will be open to OHV use.</p> <p>See EA Chapter 1; Project Implementation, p 8-11</p>

Letter number	Subject of concern	Comment	Forest Service Response
L27†	Non-motorized recreation opportunities	The EA should include alternatives, including within its Proposed Action, with an objective of retaining natural quiet in important landscapes, watersheds, or 'soundsheds'	<p>The WNF provides a wide variety of opportunities for different types of recreation. In addition to the opportunities for solitude offered by designated Wilderness (23% of forest acres, and 580 miles of trail), 95% of total trail miles are managed exclusively for non-motorized use (approximately 60% of non-Wilderness trails). The implementation of this project may increase opportunities for experiencing natural quiet through the prohibition of cross-country use on all Forest acres, and the official closure of Operational ML1 roads. The MVUM represents a clear tool for showing the public where they are allowed to drive motor vehicles; an increase in compliance is expected.</p> <p>Some comments identified user conflicts (safety considerations and impacts to natural quiet) associated with trails designated for both motorized and non-motorized users (hikers, equestrians, mountain bikers), and with the interaction of trails and dispersed campsites accessed via motor vehicle. These concerns should be addressed on a situation specific basis, as a programmatic approach (such as this analysis) will not serve to address these questions well.</p> <p>A capacity analysis of the recreation opportunities is not within the intended scope of the Purpose and Need. Additional needs for non-motorized opportunities and the resolution of user conflicts will continue to be analyzed through separate planning processes as brought to the FS by citizen proposals.</p> <p>See EA Chapter 2; Alternatives considered but eliminated from detailed study, p 12; and Chapter 3; Non-motorized Recreation, p 37-39</p>
L27	Non-motorized recreation opportunities	The EA should analyze changes in recreational demand for motorized and non-motorized types of recreation, as well as to define actions to be taken in response to these trends in recreation use. The EA should address how current unmet demand for non-motorized recreation would not be compounded by the designation of motorized routes.	See response to L27†

Letter number	Subject of concern	Comment	Forest Service Response
L27	Non-motorized recreation opportunities	The FS should make a concerted effort to enhance the recreational experience sought by trail users along the PCTNST	Motorized intrusions onto the Pacific Crest National Scenic Recreation Trail are limited Santiam Pass area. These issues have been addressed through a separate planning process. Additional issues are not known at this time.
C11	Non-motorized recreation opportunities	Proposed Action does not have enough precautions for hikers and horseback riders	See response to L27†
L27	Planning process; EA development	The FS should evaluate how each alternative would contribute to the FS achievement towards compliance with Executive Orders 11644 and 11989	<p>The compatibility will be addressed in the EA for this project. The prohibition of cross-country motorized travel is highly compatible with the Executive Orders identified here. The designation of non-motorized Management Areas in the Forest Plan and the ongoing efforts of the Willamette National Forest to protect natural resources through the closure of certain roads to motorized travel is also compatible with these orders; though this is outside the scope of the project.</p> <p>See EA Chapter 1; Applicable Laws, Regulations, Planning Documents and Analyses, p 6; and Chapter 3; Non-motorized Recreation, p 37-39</p>
L27	Planning process; EA development	The EA should identify and summarize the extent of motorized routes, including a description of their general condition or state of repair that currently cross, or are located within lands identified in the LRMP as semi-primitive non-motorized areas	<p>There are 6.4 miles of road and no motorized trails crossing semi-primitive non-motorized areas. Designated access zones will not apply in semi-primitive non-motorized management areas. Because this EA is programmatic in nature and does not include site-specific changes, these roads will remain open to motorized use.</p> <p>See EA Chapter 3; Non-motorized Recreation; p 37-39</p>

Letter number	Subject of concern	Comment	Forest Service Response
L27‡	Planning process; EA development	One or more alternatives should emphasize a minimum transportation system, which is streamlined, non-redundant and efficient; that would protect all known cultural and natural resources, while minimizing conflicts among user groups.	<p>This suggestion is outside the scope of the Purpose and Need for this project. This planning process is programmatic in nature, and allows for separate, site-specific planning processes to continue making determinations based on the considerations listed. The requirement to complete a comprehensive travel analysis will be met through a separate planning process and is not required to produce the initial MVUM showing the designated travel system.</p> <p>The number of miles of existing system roads to be designated in IRAs (44.8) and semi-primitive non-motorized (6.4) will be disclosed in the EA</p> <p>See EA Chapter 2; Alternatives considered but eliminated from detailed study, p 12</p>
L27	Planning process; EA development	The EA should analyze the economic consequences of each plan alternative, including the plan's effect on the FS's ability to continue providing quality non-motorized recreation opportunities	<p>It is not expected that the implementation of the Proposed Action will result in a great cost to the government. Initial printing costs for maps will be approximately \$15,000-\$20,000. An additional \$50,000 has been acquired to improve the road number signage at intersections to make the maps readable; maintenance of these signs will be needed. Enforcement of the rule will be more efficient with the use of the MVUM for public education and as an enforcement tool.</p> <p>See EA Chapter 1; Project Implementation, p 8-11; and Chapter 3; Other Topics; Economics, p 57</p>
L24	Planning process; route designation	Avoid designating routes through or provide generous buffers around sensitive resources	See response to L27‡
L25	Planning process; route designation	Allow OHV access only in areas where adverse affects to resources will be minimized - lower elevation Old Cascades	See response to L27‡
L25	Planning process; route designation	Do not designate OHV access in high elevation New Cascades where volcanic soils prevail (ex: Santiam Pass) or in Old Cascades near meadows	See response to L27‡

Letter number	Subject of concern	Comment	Forest Service Response
L25	Planning process; route designation	Provide non-motorized buffers between designated routes and historic properties, IRAs, designated Wilderness, scenic byways, hiking trails, and other non-motorized recreation use	See response to L27‡
C10	Planning process; route designation	Designate motorized access only on roads that will not impact vegetation, non-motorized recreation, soils, wildlife or riparian areas.	See response to L27‡
L25	Planning process; route designation	Do not designate linear historic features (ex: Santiam Wagon Road) as open to MV.	<p>The EA will not address the impacts of designated system roads and trails on the historical linear features. Linear features will only be designated as part of the transportation system if they are currently designated as system roads or trails. If a road is currently on the system, then an analysis has been completed to determine that motorized use is appropriate.</p> <p>Motorized travel along these linear features (off of the designated system) will no longer be allowed, except in designated dispersed camping access zones. Appropriate motor vehicle designation and management actions have been analyzed and implemented (road designations and route closures) for major historic routes that could be used to access campsites in designated access zones. Protection of other smaller or less well known historic routes are dealt with on a case by case basis.</p> <p>See EA Chapter 3; Heritage Resources; Proposed Action, p 55-56</p>
L25	Planning process; route designation	Recognize NHPA requirement to consider visual and auditory effects to historic properties when designating routes for motorized use.	<p>Management of auditory impacts to important properties is addressed in the Forest Plan and Special Interest Area guides or are dealt with on a case by case basis. Visual impacts to important properties are not an issue in this project, because the Proposed Action does not include actions that would impact visual quality.</p> <p>See EA Chapter 3; Heritage Resources; Proposed Action, p 55-56</p>

Letter number	Subject of concern	Comment	Forest Service Response
L27	Planning process; route designation	Route density standards should be applied in this process at clearly defined, science-based, ecological scales. They should include all motorized routes (roads, trails, and non-system routes)	Route density impacts are identified in watershed action plans and modifications are implemented under area specific, project-level NEPA. TM Rule implementation is program-level NEPA. See response to L27‡ See EA Chapter 2; Alternatives considered but eliminated from detailed study, p 12
L27	Planning process; route designation	The FS should adopt the BMPs cited here in the travel planning efforts, and if not should provide an explanation for why the BMPs were not incorporated into the planning and environmental analysis ("BMP for Off-Road Vehicle Use on Forestlands - A Guide for Designating and Managing Off-Road Vehicle Routes" 1/2008, Wild Utah Project and Wildlands CPR)	The document referred to here focuses on location of motorized routes. The scope of this project does not include closing or restoring routes. Motorized use will continue only on 'open' roads which are maintained for passenger and high clearance vehicles. We are not proposing to designate motorized use on user-created or hydrologically unstable spurs. See response to L27‡
L51	Planning process; route designation	Selection of OHV trail systems should be closely coordinated with the ODFW to keep routes out of known critical deer and elk habitat areas such as winter range and calving/fawning areas.	Consultation with the US Department of Fish and Wildlife was not required, as the designated transportation system identified in the Proposed Action represents the baseline. Designation decisions are administrative and only incorporate roads and trails currently on the Forest Service System; this does not represent a Federal agency action under the Endangered Species Act. See EA Chapter 4; Consultation with Others; Agency Consultation, p 62
L27	Planning process; route designation	OHV trail designation should be limited to only those areas where enforcement capabilities can be routinely and effectively carried out	The designation of motorized trails is based on existing management of the trail system. This will not result in a change in Law Enforcement responsibilities.
L23	Resource interests; cultural	Restrict OHV use along the Santiam Wagon Road and the area around Sand Mountain.	Determinations of whether OHVs will be allowed on individual roads are made by District Rangers, based on the results of a safety analysis. See EA Chapter 1; Project Implementation, p 8-11; and Chapter 3; Other Topics; Public Health and Safety, p 60

Letter number	Subject of concern	Comment	Forest Service Response
L1, L4, C7	Resource Interests; OHVs	Closing roads and trails results in restricting OHV use to small areas will cause safety and resource concerns.	<p>The scope of this project is programmatic in nature and is limited to the existing transportation system and does not extend to evaluating impacts to resources, except for cross-country travel.</p> <p>See response to L27‡</p>
L5	Resource Interests; OHVs	Proposal to restrict OHV to a designated system is insufficient to address resource issues.	<p>The scope of this project is programmatic in nature and is limited to the existing transportation system and does not extend to evaluating impacts to resources, except for cross-country travel.</p> <p>See response to L27‡</p>
L1	Retain OHV Opportunities	Maintain connectivity of motorized trails	<p>Decisions to designate trails to motorized use are based on the existing management of that particular trail.</p> <p>See EA Chapter 3; Motorized Recreation; Existing Condition; Motorized Recreation Opportunities, p 27-28</p>
L30†	Road system; game retrieval	Hunters should be allowed to retrieve game on closed roads	<p>Exceptions to the requirement to stay on the designated system will not be made for game retrieval, per a decision made at the Regional level. This is not within the power of the Willamette National Forest to decide. The impact to recreationists using ML1 roads and travelling cross-country is evaluated in the EA.</p> <p>See EA Chapter 3; Motorized Recreation; Proposed Action, p 32-37</p>
P11	Road system; game retrieval	Spur roads located near the wilderness boundary should remain open for game retrieval	See response to L30†
P12	Road system; game retrieval	Retain access for hunters	See response to L30†

Letter number	Subject of concern	Comment	Forest Service Response
M2	Road system; game retrieval	It is too bad that the game retrieval exception is off the table.	See response to L30†
L27	Road system; game retrieval	Do not allow motorized travel off of the designated system for purposes of big game retrieval	See response to L30†
P9*	Road system; retain access ML1 Roads	ML 1 roads should remain open	Operational ML1 Roads are currently managed as closed, though no formal CFR has been issued. It is a national standard that ML1 roads be closed through this process. The WNF is currently in the process of identifying roads which are not accurately classified as ML1 so that access may be allowed on roads that are actively used when appropriate. This is addressed in the EA. See EA Chapter3; Motorized Recreation; Motorized Recreation on System Roads, p 28-29; and Proposed Action, p 32-37
M1	Road system; retain access ML1 Roads	I ride my quad on powerline roads. What ML are these and will they be open for use?	They are ML1 and will be closed. See response to P9; Road system; retain access to ML1 Roads.
P4	Road system; retain access ML1 Roads	Retain access to ML1 roads for OHVs and game retrieval	See response to P9*

Letter number	Subject of concern	Comment	Forest Service Response
L2	Road system; retain access ML1 Roads	Allow motorized use on all roads and trails that have been established, regardless of maintenance condition	See response to P9*
P9	Road system; retain access on roads closed through NEPA	Roads closed through NEPA process that have not yet been physically closed should be designated as open to the public	Some roads have been closed through NEPA, but not yet closed physically on the ground. The environmental analysis has been completed to close these roads, so they will remain closed to public access. See EA Chapter 3; Motorized Recreation; Proposed Action p 32-37
L5	User Conflicts between motorized and non-motorized	Proposal distributes motorized use so that non-motorized users cannot escape social impacts; will not minimize user conflicts	Specific use conflicts have not been identified as part of the scoping process. In areas where conflicts occur, site specific management decisions have been made (ex: Santiam Pass Recreation Area and non-motorized visitors to the Santiam Wagon Road and Sand Mountain) See EA Chapter 3; Non-motorized Recreation, p 37-39
L27	User Conflicts between motorized and non-motorized	The FS needs to employ a rational approach in meeting the use conflict provisions	Specific use conflicts have not been identified as part of the scoping process. In areas where conflicts occur, site specific management decisions have been made (ex: Santiam Pass Recreation Area and non-motorized visitors to the Santiam Wagon Road and Sand Mountain) See EA Chapter 3; Non-motorized Recreation, p 37-39
C2	User Conflicts between motorized and non-motorized	OHVs are not compatible with other forms of recreation; impact natural quiet	Specific use conflicts have not been identified as part of the scoping process. In areas where conflicts occur, site specific management decisions have been made (ex: Santiam Pass Recreation Area and non-motorized visitors to the Santiam Wagon Road and Sand Mountain) See EA Chapter 3; Non-motorized Recreation, p 37-39

Letter number	Subject of concern	Comment	Forest Service Response
		These comments will be considered when designing the public comment period for the EA	
L5	Planning process; public information	Could not locate URL for website in scoping letter	These comments were used to shape the public comment period for the EA. A map will be created which will be accessible to the public.
L5, L12, L18, L22, C5, P2, P3	Planning process; public information	Could not make a meaningful comment because a map of the Proposed Action was not accessible	This comment will be considered when designing the public comment period for the EA.
L6, L55	Planning process; public information	No maps are available to review proposal	This comment will be considered when designing the public comment period for the EA.
L31	Planning process; public information	Where can I find a list of roads that will be closed through this process?	This comment will be considered when designing the public comment period for the EA.
L35	Planning process; public information	I cannot find maps on the WNF website that indicate the proposed OHV trails.	This comment will be considered when designing the public comment period for the EA.
L44	Planning process; public information	Why are the maps for the access zones not posted on the internet?	This comment will be considered when designing the public comment period for the EA.
L44	Planning process; public information	Why must an appointment be made to view the working documents?	This comment will be considered when designing the public comment period for the EA.
C4	Planning process; public information	Without a map it was difficult to see the reductions in access that are proposed; post these access changes on the web.	This comment will be considered when designing the public comment period for the EA.
L38	Planning process; public information	The Table of Anticipated Changes for Public Access was very helpful	This comment will be considered when designing the public comment period for the EA.
L6	Planning process; public involvement	Process discourages comments - no map or brochure to explain specifics of proposal	These suggestions have been shared with the planning team on the MFRD, as many of them pertain to road closure decisions in this area; not this process
L6	Planning process; public involvement	The FS does not let the public know of projects until it is too late	The Forest has conducted three rounds of public involvement regarding the implementation of the Travel Management Rule, starting in 2007
L8	Planning process; public involvement	Seek more advice from the people affected by limitations to motorized use before enacting the rule.	The Forest has conducted three rounds of public involvement regarding the implementation of the Travel Management Rule, starting in 2007

Letter number	Subject of concern	Comment	Forest Service Response
L33	Planning process; public involvement	A sample size of 40 is too small and therefore biased to be used to create a Proposed Action.	This comment will be considered when designing the public comment period for the EA.
L47	Planning process; public involvement	Public process is lacking: should have maps available on the website showing proposed impacts.	This comment will be considered when designing the public comment period for the EA.
L55	Planning process; public involvement	A broad base of recreational and involved concerned citizens should have the opportunity to view the MVUM before it is set permanently.	This comment will be considered when designing the public comment period for the EA.
P7	Planning process; public involvement	The public is being left out of the decision making process	The Forest has conducted three rounds of public involvement regarding the implementation of the Travel Management Rule, starting in 2007
M2	Planning process; public involvement	What type of feedback do you want from the public?	Help us to truth our database: maintenance conditions, open/closed roads, where our road number signage needs work, etc...
P4	Planning process; public involvement	Unaware of comment period until shortly before it closed; suggested further methods for outreach including fliers to be posted at Bi-mart and other sotres where recreationists frequent.	This comment will be considered when designing the public comment period for the EA.
L13	Planning process; public involvement	Does the Grand Ronde know about the Proposed Action?	Yes. See EA Chapter 4; Consultation with Others, Tribal Consultation, p 61
		Specific to implementation of the Rule	These comments are generally questions about or suggestions for implementing the Proposed Action. Such comments will be reviewed during the process of planning implementation of the selected alternative. See EA Chapter 1; Project Implementation, p 8-11
L27	Dispersed camping; implementation	FS needs to effectively communicate where and how vehicle supported dispersed camping will be allowed and note these locations on the MVUM and other visitor maps, brochures, and agency website.	See section header: Specific to implementation of the Rule
L27	Implementation; Feasibility	The EA should disclose the degree to which current trends in budgeting will affect FS ability to implement, monitor and enforce user compliance.	The analysis will disclose the economic costs of implementing the Proposed Action and any alternatives analyzed See EA Chapter 1; Project Implementation, p 8-11; and Chapter 3; Other Topics; Economics, p 57

Letter number	Subject of concern	Comment	Forest Service Response
L5	Implementation; Feasibility	FS does not have enough law enforcement officers to enforce the proposal, since motorized use will be distributed throughout the Forest; do not designate OHV use on roads and trails except in confined areas	See section header: Specific to implementation of the Rule
L33	Implementation; Feasibility	Detail the financial impacts for serious enforcement (using the MVUM) and add the cost to a new or existing off-road licence.	See section header: Specific to implementation of the Rule
M2	Implementation; Feasibility	Is this system cost-effective in terms of what you are trying to protect?	Yes. People will now know where they should or should not use their vehicles, which will improve compliance. Resource damage will be reduced with the elimination of cross-country travel. It will make the job easier for dealing with clear violations of the law that cause resource damage.
L21	Implementation; Law Enforcement	The FS should practice total cooperation and open communication regarding hard and fast rules and acknowledge exceptions to rules	We will attempt to be open throughout our process and implementation. We understand it will take a while for the public to get used to using the MVUM to understand where they can travel by motor vehicle.
L28*	Implementation; Law Enforcement	People should not be cited for driving on roads which are physically open	The map on which the designations are shown will give law enforcement a tool to cite people who are causing real damage to the land with the use of their motor vehicles. Law enforcement will continue to focus their efforts in places where they know that are issues with resource damage and illegal activity. This tool is not intended to be used to cite otherwise law-abiding citizens for mistakes made in where they drive. We will need your input on how to make this map more accessible and clear to the public over time.
L30, 36	Implementation; Law Enforcement	Law enforcement should not cite members of the public for misinterpreting regulations	See response to L28*
C2	Implementation; Law Enforcement	Rules need to be strictly enforced and paid for by fees	See section header: Specific to implementation of the Rule
C3	Implementation; Law Enforcement	There should be ranger presence to assist the public and aid in enforcement	See section header: Specific to implementation of the Rule
C6	Implementation; Law Enforcement	Prompt detection and enforcement will be important	See section header: Specific to implementation of the Rule

Letter number	Subject of concern	Comment	Forest Service Response
C13	Implementation; Law Enforcement	How are you going to enforce all of the rules and regulations you are imposing?	See section header: Specific to implementation of the Rule
C1	Implementation; Maps	The maps for users should have well defined and simple borders as well as designated trails	See section header: Specific to implementation of the Rule
P9	Implementation; Maps	Map will be too vague to use for the public or for enforcement	See section header: Specific to implementation of the Rule
M1, M2	Implementation; Maps	Maps should have latitude/longitude for use with GPS and for Law Enforcement purposes	Not in the first year; possible in the future
M1	Implementation; Maps	Will maps show T, R, Sec?	Yes
M2	Implementation; Maps	Use working map tailored to specific groups in addition to MVUM – to tell people where they can or can't go in specific areas	There is a possibility of creating supplemental maps or information in the future to help people understand where they are allowed to go. Likely in future years.
C10	Implementation; Maps	The MVUM should be available at district offices and as phone information for people without computers.	See section header: Specific to implementation of the Rule
L36	Implementation; proposal complexity	Rules are too complicated and ambiguous to follow or enforce	See section header: Specific to implementation of the Rule
C1	Implementation; proposal complexity	Simplify proposal for ease of enforcement. Simplify to protect resources rather than to provide dispersed access.	See section header: Specific to implementation of the Rule
C1	Implementation; proposal complexity	Enforcement can be more successful with only a few necessary changes of the rules and maps from year to year.	See section header: Specific to implementation of the Rule
L51	Implementation; Public Education	A major effort on public outreach, information and education will be needed to avoid conflicts between the agency and the public during implementation.	See section header: Specific to implementation of the Rule
L51	Implementation; signage	The forest's road number signage will need to be improved for the public to be able to avoid accidental violations (particularly on 3 digit spur roads).	See section header: Specific to implementation of the Rule
M1	Implementation; signage	When marking spurs with numbers, please have carsonites face the main road; seeing the blank side is not helpful	See section header: Specific to implementation of the Rule

Letter number	Subject of concern	Comment	Forest Service Response
L15	Implementation; signage	Signage indicating allowed uses would be more effective than a map of allowed uses for implementation	See section header: Specific to implementation of the Rule
L51	Implementation; signage	New mapping should be made available to the public, and signage should be placed on roads where the new access rules do not apply	See section header: Specific to implementation of the Rule
C3	Implementation; signage	Camps, roads, and trails should be marked with permanent signs so there is no confusion.	See section header: Specific to implementation of the Rule
C11	Implementation; signage	Signs should be posted letting users know who has the right of way and crossing signs where trails intersect with roads	See section header: Specific to implementation of the Rule
P11	Implementation; signage	Install green dot/red dot signage on the ground to supplement the map	See section header: Specific to implementation of the Rule
M1,M2	Implementation; signage	Will there be anything marked in the field similar to how 'green dot' system is posted? (it is very useful)	Not in the first year; possible in the future
L33	Planning process; EA development	Detail the consequences for off system travel and make them serious enough to deter going off system (including fines and bans)	See section header: Specific to implementation of the Rule
L24	Planning process; route designation	Designate only a minimum number of routes as open to OHV to improve initial education and enforcement. In subsequent years, add routes if warranted.	See section header: Specific to implementation of the Rule
		Non-significant issues	These comments are outside the scope of the Purpose and Need. The decisions to close or open roads/trails or to make ground disturbing changes are made through site-specific projects. This project is programmatic in scope and does not include site-specific proposals.
L33	Designated system; reduce public access	OHV users have a large amount of land available for being a small segment of the visiting population.	See section header: Non-significant issues
L25	Designated system; reduce public access	Do not codify existing condition for OHV road use. Implementation of Rule should serve to limit OHV use on NF lands	See section header: Non-significant issues
C4	Designated system; reduce public access	Reduce and eliminate many of the roads and trails currently open to motorized travel.	See section header: Non-significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L7	Designated system; reduce public access	Support for closure of 1000 miles of roads to vehicle travel to improve wildlife habitat and forest restoration	See section header: Non-significant issues
L32	Designated system; reduce public access	Close more roads and implement more restrictions	See section header: Non-significant issues
L34	Designated system; reduce public access	Restrict access to roads leading into trailheads or close more roads to protect natural resources and non-motorized recreation.	See section header: Non-significant issues
L37	Designated system; reduce public access	Support for road closures and for not allowing people to drive on roads that are not obviously closed.	See section header: Non-significant issues
L46	Designated system; reduce public access	Roads should be closed to protect resources, non-motorized recreation experience	See section header: Non-significant issues
L46	Designated system; reduce public access	There are hundreds of thousands of miles of unnecessary roads on the NFS of which there is no budget to maintain.	See section header: Non-significant issues
C10	Designated system; reduce public access	Decrease road and OHV network	See section header: Non-significant issues
C15	Designated system; reduce public access	Close more roads and trails to OHVs	See section header: Non-significant issues
L36	Designated system; retain public access	Need to keep all roads and existing travel routes open for public use	See section header: Non-significant issues
L4	Designated system; retain public access	Leave existing roads open to motorized traffic	See section header: Non-significant issues
L9	Designated system; retain public access	Don't close any roads	See section header: Non-significant issues
L11	Designated system; retain public access	Do not additionally restrict any road use on the National Forest	See section header: Non-significant issues
L14	Designated system; retain public access	FS closes roads in the name of resource management regardless of necessity	See section header: Non-significant issues
L28	Designated system; retain public access	Do not close roads to recreation access	See section header: Non-significant issues
L30	Designated system; retain public access	Do not close roads	See section header: Non-significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L30	Designated system; retain public access	Unmaintained roads should not be closed to motor vehicles. They do not represent a safety concern.	See section header: Non significant issues
L39	Designated system; retain public access	Open more roads	See section header: Non significant issues
L42	Designated system; retain public access	There should be minimal closures on forest roads	See section header: Non significant issues
L44	Designated system; retain public access	The lands on which roads are located were set aside for multiple uses, which includes access by every citizen. If you restrict vehicle access, those areas that are left will be overused	See section header: Non significant issues
P1	Designated system; retain public access	Would like to see protection written into EA that would keep additional roads and trails from being closed.	See section header: Non significant issues
C14	Designated system; retain public access	Keep roads open	See section header: Non significant issues
P5	Designated system; retain public access	The FS closes too many roads, resulting in restricting recreation access to a few main areas.	See section header: Non significant issues
P5	Designated system; retain public access	All roads should be maintained for MV use. One option is use all employees currently working in the field to help with roads maintenance.	See section header: Non significant issues
L30	Designated system; retain public access	Keep road access for dispersed camping, huckleberry picking, mushroom picking, and hunting	See section header: Non significant issues
L18	Designated system; retain public access	Retain access on primitive roads for foragers to access forage sites (forest products)	See section header: Non significant issues
P7	Designated system; retain public access	Keep roads open for hunting and berry picking all throughout the Oakridge area.	See section header: Non significant issues
L35	Develop OHV Opportunities	Given the huge demand and shrinking supply of OHV trails, there is a huge deficit of quality OHV experiences in the Willamette National Forest	See section header: Non significant issues
L35	Develop OHV Opportunities	Roads should not be the only form of travel available to OHVs, as they are not sufficient to provide ample recreation opportunities - they are boring and dangerous to Class III OHVs.	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L1	Develop OHV Opportunities	Develop OHV trails where resource impacts can be addressed	See section header: Non significant issues
L16	Develop OHV Opportunities	Create more motorized trails to compensate for lost opportunities for cross-country use	See section header: Non significant issues
L2	Develop OHV Opportunities	Work with the local OHV community to enhance and increase the amount of motorized opportunities for the public	See section header: Non significant issues
L5	Develop OHV Opportunities	Use state OHV funds to create and manage more OHV areas; restrict OHV use in greater forest area	See section header: Non significant issues
L19, L21	Develop OHV Opportunities	Develop McCoy Snowmobile trail as an OHV area	See section header: Non significant issues
L34, C2	Develop OHV Opportunities	Set aside areas for OHVs to protect non-motorized recreation experience elsewhere.	See section header: Non significant issues
L35	Develop OHV Opportunities	Create a comprehensive OHV trail system to provide appropriate opportunities for OHVs and to reduce impacts.	See section header: Non significant issues
L35	Develop OHV Opportunities	Increase the mileage of Class III OHV trails with interlinking loop trails and scenic destinations, variability of trail difficulty	See section header: Non significant issues
L35	Develop OHV Opportunities	More class III trail miles disperses use and reduces problems with trail maintenance and safety	See section header: Non significant issues
L37	Develop OHV Opportunities	As our population grows, so should our motorized recreation opportunities. Closing trails is going in the wrong direction.	See section header: Non significant issues
L38	Develop OHV Opportunities	Close out of service logging roads and make up for the lost opportunity by creating challenging, exciting, and interesting trails for OHV enthusiasts	See section header: Non significant issues
L38	Develop OHV Opportunities	Develop challenging trails for 4x4 vehicles because they have the fewest recreation opportunities and are the vehicles to cause the most damage when seeking out exciting opportunities.	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L39	Develop OHV Opportunities	Aging population is expanding and OHV sales are increasing; this causes the need for more motorized recreation opportunities that will serve to reduce resource damage.	See section header: Non significant issues
L54	Develop OHV Opportunities	Support any efforts to add classified trails to the designated system.	See section header: Non significant issues
C3	Develop OHV Opportunities	Develop campgrounds for OHV users and charge fees	See section header: Non significant issues
C3	Develop OHV Opportunities	Develop trails for side-by-sides that are over 50" wide	See section header: Non significant issues
C7	Develop OHV Opportunities	Some areas are more appealing for OHVs than for hikers (the uses naturally separate themselves). These areas should remain open.	See section header: Non significant issues
C9	Develop OHV Opportunities	Develop additional quad trails and keep open existing quad trails.	See section header: Non significant issues
C13	Develop OHV Opportunities	Should have more approved areas for riding.	See section header: Non significant issues
L5	Develop OHV Opportunities	Restrict OHV use to smaller, contained areas where impacts can be managed and rules can be enforced	See section header: Non significant issues
L22	Dispersed camping; limit motorized access	Close dispersed camping areas along Salmon Creek Trail and Middle Fork area near Larison to motorized vehicles to preven trash dumping and long-term camping and to provide for safety	See section header: Non significant issues
C10	Dispersed camping; limit motorized access	Improve some camping areas and get rid of others	See section header: Non significant issues
L30	Dispersed camping; retain access	This is an attempt to ban dispersed camping and replace it with fee campgrounds.	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L27	General anti-motorized access	The Proposed Action should preclude consideration of existing user-created trails for designation as motorized routes	See section header: Non significant issues
L18	General anti-motorized access	Support the need to minimize OHV impact and restrict access to motor vehicle traffic	See section header: Non significant issues
L20	General anti-motorized access	Support limiting motor vehicle access to our public lands	See section header: Non significant issues
L33, L47, L53, C1, C4	General anti-motorized access	This proposal is a step in the right direction at controlling motor vehicle impacts	See section header: Non significant issues
L33	General anti-motorized access	Stop irresponsible off-road vehicle use	See section header: Non significant issues
L43	General anti-motorized access	Horsemen and campers are restricted, but there are no regulations for ATVs, due to the powerful force of the ATV industry.	See section header: Non significant issues
L1, L8, L10, L15, L30, L48, C5	General Pro-motorized access	Public lands need to remain open to the public for motorized use	See section header: Non significant issues
L1	General Pro-motorized access	Please do not further restrict our access	See section header: Non significant issues
L2	General Pro-motorized access	Motorized access to National Forest is a historical right that should be maintained	See section header: Non significant issues
L6, L17, L36, L48, C5, C14	General Pro-motorized access	Don't punish the general public by restricting access because of the illegal actions of a few people	See section header: Non significant issues
L6	General Pro-motorized access	FS is not intended to be a policing organization, and should focus on forest management for the benefit of all citizens	See section header: Non significant issues
L6, P1	General Pro-motorized access	This is the first step in more restrictions	See section header: Non significant issues
L10	General Pro-motorized access	Unclear comment regarding interaction between private and public land and access	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L11	General Pro-motorized access	The government continues to restrict what citizens can do	See section header: Non significant issues
L11, L17, L36, L50	General Pro-motorized access	I am a responsible user that benefits the forest; people like me should not be restricted	See section header: Non significant issues
L30	General Pro-motorized access	This proposal is an attempt to control people	See section header: Non significant issues
L40	General Pro-motorized access	In the USA, it is wrong that I will be required to have a map to tell me where I can and can't go and camp on public land.	See section header: Non significant issues
L37	General Pro-motorized access	This proposal restricts freedom of recreation	See section header: Non significant issues
L41	General Pro-motorized access	No recreation activity is carbon neutral, so trails should not be closed to OHVs	See section header: Non significant issues
L42	General Pro-motorized access	There should be more firewood oportunities	See section header: Non significant issues
L48	General Pro-motorized access	People look for inexpensive recreation in tough economic times - motorized recreation opportunities should be provided	See section header: Non significant issues
L48	General Pro-motorized access	Restrictions will cause division between the public and the government	See section header: Non significant issues
C7	General Pro-motorized access	Leave open more acres than in any of your current proposals.	See section header: Non significant issues
P1	General Pro-motorized access	Lack of trust for government actions	See section header: Non significant issues
P1	General Pro-motorized access	Do not want to lose current motorized access through gradual process of attrition.	See section header: Non significant issues
P2, P3	General Pro-motorized access	Access to roads and dispersed sites should be retained.	See section header: Non significant issues
P7	General Pro-motorized access	Happy to volunteer to maintain roads.	See section header: Non significant issues
C14	General Pro-motorized access	I don't like closed unless marked open rule. Too easy of a way to close roads.	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
C6	Implementation; physical barriers	On the ground management should include constructing obstacles, "approach (unclear word)" as soon as non-permitted use is detected.	See section header: Non significant issues
C8	Implementation; physical barriers	Sufficient barriers should be erected to keep out motor vehicles in popular areas or close to town.	See section header: Non significant issues
L37	Implementation; signage	It will be costly to sign every trail that is open to OHVs to allow them to ride there but will be necessary to allow OHV recreation opportunities	Clarification: enforcement tool is the map, not signage on the ground.
C10	Implementation; signage	Barricade closed roads and sign with posted fines and maps showing alternate routes	See section header: Non significant issues
L1, L15	Planning process; do not implement	Instead of implementing new rules, use education and enforcement to prevent resource impacts	See section header: Non significant issues
L50	Planning process; do not implement	Who is requiring you to implement the rule? You should be following what the people of Oregon want.	See section header: Non significant issues
L2	Planning process; do not implement	Not every activity on the National Forest needs to be managed	See section header: Non significant issues
L6	Planning process; do not implement	Unlawful activities should be handled on a case-by-case basis. Increase enforcement of current rules and do not implement new restrictions.	See section header: Non significant issues
L6, L8, L37	Planning process; do not implement	There is no need for action	See section header: Non significant issues
L15	Planning process; do not implement	Pass more laws and there will be more illegal use	See section header: Non significant issues
C13	Planning process; do not implement	It does not make sense to create more rules as a solution, just because you perceive a problem.	See section header: Non significant issues
L50	Planning process; do not implement	There is no need for action; planning new rules is a waste of taxpayer money	See section header: Non significant issues
L50	Planning process; do not implement	We already have enough laws. Just enforce the ones we have.	See section header: Non significant issues
L27	Planning process; EA development	The EA should include a detailed plan for closing and obliterating routes identified for closure.	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L27	Planning process; route designation	The TM process should be used as an opportunity to strategically decommission roads in order to re-establish large unroaded areas and the many values associated with maintaining large blocks of intact habitat.	See section header: Non significant issues
L35	Planning process; route designation	Planning process should be an EIS to increase the trail opportunities for Class III OHVs.	See section header: Non significant issues
L37	Planning process; route designation	Use this process to expand motorized recreation opportunities, not close them off	See section header: Non significant issues
L5	Planning process; scope	Proposal should extend to snowmobiles; snowmobiles should be restricted to smaller areas	They are not being considered in this step, but winter use issues may be the next use issue that the agency addresses (at a national level)
L14	Planning process; scope	The wording of the plan leaves the possibility for more restrictions to be placed on snowmobiles eventually.	See section header: Non significant issues
C6	Planning process; scope	The exception for over-snow OHV use should be separately addressed in a separate MVUM style map to address impacts to wildlife and exposure to rogue abuse. Over the snow use undercuts the simple clear structure of the MVUM rule.	See section header: Non significant issues
M1	Planning process; scope	Understand the overall intent of TM is to protect resources, but given what is known about snowmobile impacts, it is unfair that those are not being considered	See section header: Non significant issues
M1	Planning process; scope	The agency should cooperate with ODFW and identify winter use trails and enforce that pattern of use.	See section header: Non significant issues
P9	Planning process; scope	Aircraft, watercraft, and mountain bikes should be included in this process.	See section header: Non significant issues
L2	Proposal is externally influenced	This proposal favors non-motorized recreation over motorized forms of recreation	See section header: Non significant issues
L4	Proposal is externally influenced	Proposal creates forced wilderness	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L4, C14	Proposal is externally influenced	Proposal is effort to promote environmentalist agenda	See section header: Non significant issues
L6	Proposal is externally influenced	The motivation behind this proposal is to raise revenues by writing citations	See section header: Non significant issues
L6	Proposal is externally influenced	Proposal is driven by metropolitan populations and Oregon newcomers	See section header: Non significant issues
L8	Proposal is externally influenced	Proposed limitations are politically driven with little regard for the citizens of the state	See section header: Non significant issues
L11	Proposal is externally influenced	This proposal is driven by the interests of environmentalists in urban areas	See section header: Non significant issues
L14	Proposal is externally influenced	Motorized use is continually more restricted as a result of environmental organization pressure	See section header: Non significant issues
L48	Proposal is externally influenced	These regulations serve an agenda, not the will of the people.	See section header: Non significant issues
L33	Resource Interests; Motorized Use	Increase enforcement of current laws to protect resources	See section header: Non significant issues
L41	Resource Interests; Motorized Use	OHVs do not cause more damage than other types of recreation to trails	See section header: Non significant issues
L1	Retain motorized cross-country travel	Maintain off-road access in areas currently used	The ban on cross-country motorized travel is required by the Travel Management Rule, which requires each Forest to go to a 'closed unless designated open' status. Because our visitors do not engage in much cross-country use, we are hoping that this will not impact people too much.
L30	Retain motorized cross-country travel	Do not ban cross-country motorized travel	See section header: Non significant issues
L50	Retain motorized cross-country travel	Prohibiting off-road use is wrong, and the land should be open to all	See section header: Non significant issues
L56	Retain motorized cross-country travel	Should still be allowed to drive on non-system roads.	See section header: Non significant issues
P5	Retain motorized cross-country travel	Allow a wide range of exceptions to allow people to get off of the designated system.	See section header: Non significant issues
L16	Retain OHV Opportunities	Protect trails from impacts due to logging and development	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
L2	Road system; physical barriers	Remove all illegal gates limiting legitimate access	See section header: Non significant issues
P7	Road system; physical barriers	Water bars are too difficult to drive over	See section header: Non significant issues
L15	Road system; physical barriers	Water bars should be designed for erosion control and still allow 4x4s to access the roads.	See section header: Non significant issues
L26	Santiam Pass or Huckleberry	OHV use around Ray Benson Snopark will result in an expansion of the current network of pioneered trails and impact the newly regrowing areas of the B&B Fire. It would also impact the privacy and security of Hoodoo Cabin Tract Owners.	Referred these comments to Steve Otoupalik to address in reference to the Santiam Pass OHV area planning process
L37	Santiam Pass or Huckleberry	Huckleberry is a good development; created more trail mileage (motorized opportunity) which will take strain off of the other trails in the system.	See section header: Non significant issues
L27	Trail system - reduce motorized access	The Proposed Action should preclude consideration of new motorized trail construction as part of the current EA	See section header: Non significant issues
L33	Trail system - reduce motorized access	Acknowledge that off-road vehicle trails are a destructive and non-compatible use of the forest and in the long run should be phased out.	See section header: Non significant issues
L3, L23, C2	User Conflicts between motorized and non-motorized	OHV use is dangerous on trails designated for motorized and non-motorized uses and should be restricted	See section header: Non significant issues
L3, L55	User Conflicts between motorized and non-motorized	Traditional uses should be given higher priority and right of way in management decisions	See section header: Non significant issues

Letter number	Subject of concern	Comment	Forest Service Response
		Addressed in Proposed Action	These comments are consistent with the Proposed Action and/or Purpose and Need See EA Chapter 1; Project Implementation, p 8-11 and Chapter 2; Proposed Action, p 13-21
L3	Designated system; support for status quo	The designation of roads for both motorized and non-motorized uses is appropriate	See section header: Addressed in Proposed Action
L17	Designated system; support for status quo	Main gravel roads should remain open to street-legal vehicles.	See section header: Addressed in Proposed Action
L27	Designated system; support for status quo	Do not designate roads that are already managed as closed to motorized use	See section header: Addressed in Proposed Action
P10	Designated system; support for status quo	Retain access on through roads	See section header: Addressed in Proposed Action
L21	Designated system; support for status quo	Support keeping the roads closed that protect wildlife and sensitive environmental areas	See section header: Addressed in Proposed Action
L27	Dispersed camping; general comments	Proposed Action is a starting point for offering sustainable dispersed camping opportunities	See section header: Addressed in Proposed Action
L54	Dispersed camping; general comments	Dispersed camping should be enhanced in a manner that is environmentally sustainable so that future generations may enjoy this activity as we do today.	See section header: Addressed in Proposed Action
L20	Dispersed camping; limit motorized access	Providing limited access to camping in a way that protects resources will provide ample opportunities for motorized travel	See section header: Addressed in Proposed Action
L37	Dispersed camping; retain access	I hope that my ability to camp in whatever location is not taken away	See section header: Addressed in Proposed Action
L39	Dispersed camping; retain access	Keep dispersed camping available for families	See section header: Addressed in Proposed Action
C3	Dispersed camping; retain access	Continue to allow motorized access to many campsites	See section header: Addressed in Proposed Action

Letter number	Subject of concern	Comment	Forest Service Response
C3	Implementation; Maps	Maps should be readily available to the public so people can know exactly where they can drive, ride, and camp.	See section header: Addressed in Proposed Action
M1	Implementation; Maps	Map design should be consistent across units	The MVUM standard requires this. We are also considering working with partners to develop a map version that is more useful to folks and not constrained by our national guidelines (at some point in the future).
C6	Misc. Comments on Proposed Action	Strategy is clear and simple	See section header: Addressed in Proposed Action
L53	Misc. Comments on Proposed Action	We would like to support this change	See section header: Addressed in Proposed Action
L1	Motorized Mixed Use	Mitigate motorized mixed use concern with education and signage; allow continued use by OHVs	Determinations of whether OHVs will be allowed on individual roads are made by District Rangers, based on the results of a safety analysis. Most roads open to OHV use currently will remain open
P11	Motorized Mixed Use	Motorized mixed use should continue on gravel roads	See section header: Addressed in Proposed Action
L21	Motorized Mixed Use	Keep the logging roads open for OHV access	Most roads open to OHV use will remain open. Please visit local coordinator for questions on specific roads
L1	Motorized Mixed Use	Maintain OHV access on roads	See section header: Addressed in Proposed Action
L1	Non-motorized recreation opportunities	Maintain non-motorized recreation areas for that purpose only	See section header: Addressed in Proposed Action
L39	Non-motorized recreation opportunities	Wilderness is adequate for providing hiking opportunities	See section header: Addressed in Proposed Action
L27	Planning process; EA development	Support EA Purpose and Need statement	See section header: Addressed in Proposed Action
L40	Planning process; route designation	Take your fire maps, and include all roads and trails in the MVUM justified by their current existence. Then remove any that are currently controlled for habitat or any current restriction. Then take public input for further restrictions to motorized use.	See section header: Addressed in Proposed Action

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L53	Resource interests; cultural	The proposal would establish a better foundation for management of OHV use and present a greater opportunity to protect the area's historic resources.	See section header: Addressed in Proposed Action
L24, 25	Resource Interests; Motorized Use	Proposal is the first step in curtailing impacts from motorized use	See section header: Addressed in Proposed Action
L3, L16, L20, L27, L45, L55, C9	Restrict motorized cross-country travel	Support for prohibition of motorized use off of the designated system	See section header: Addressed in Proposed Action
L32	Restrict motorized cross-country travel	Do not allow off-road use except in OHV areas	See section header: Addressed in Proposed Action
L52	Restrict motorized cross-country travel	Willamette Valley Projects recommends that OHV access to the lakebeds (reservoirs) be restricted in the TM plan to protect water quality, natural and cultural resources.	See section header: Addressed in Proposed Action
L41	Retain OHV Opportunities	Do not close trails to OHVs	See section header: Addressed in Proposed Action
L3, L23, L55	Road system; parking access	Provide adequate parking opportunities for stock trailers at trailheads and dispersed campsites	See section header: Addressed in Proposed Action
L9, L17	Road system; protect recreation experience	Protect exploration experience associated with motorized use on roads	See section header: Addressed in Proposed Action
		Clarifying Questions	These comments will be reviewed when drafting the EA so that the Purpose and Need and Proposed Action descriptions are clear.
M2	Clarifying questions	Will seasonal closures change?	We are not proposing to change anything in this proposal. Separate processes will add or remove seasonal closures. We want feedback on how you use roads that are designated as 'closed' so that we can fix any mistakes we have in our mapping.

Letter number	Subject of concern	Comment	Forest Service Response
L29	Clarifying questions	Will OHV riding areas be proposed anywhere near the PCT?	The Santiam Pass project is totally separate process from TM. We are not proposing any off-road areas through this process. We are proposing dispersed camping zones on some roads throughout the forest, on which people can drive up to 300' from the system road to access their campsite. Looking through the maps of our Proposed Action, I can't find any of these zones that intersect the PCT. Most OHV access should remain the same as it currently is on roads and trails. The only exceptions will be for safety on some roads.
M1	Clarifying questions	Will we still be able to complete restoration projects we do under powerlines using motor vehicles?	It depends on the reason the road is closed. If some use is ok, we can issue an exception for administrative reasons
L55	Clarifying questions	Is there a process built into this rule for future needed changes/corrections?	The MVUM will be revised as needed each year to reflect site-specific projects or to incorporate database improvements.
M2	Clarifying questions	Is there an exception for cross-country travel to reach elk camps?	There is an exception for travel off of the designated system to reach dispersed campsites by driving along existing routes.
L55	Clarifying questions	Does the MVUM truly reflect what has been on-going use of currently transportation and trail systems?	Yes.
M2	Implementation; Maps	Why reformat the mapping system when the MF roads map is very good?	We are constantly improving the quality of our data, as is shown by our working maps. The MVUM is designed to be a LE and education tool (designed to show only where people can drive) – it is not designed to be a tool for navigation
M2	Implementation; Maps	Will the maps be published online?	We are investigating technology to make the maps portable for public viewing and use.
M2	Implementation; Maps	If this map is revised every year, does it mean roads will be closed every year?	Not through the TM process. However, we have a bigger road system than we can afford and we address this issue by closing or waterbarring some roads. This is on a site specific, project-by-project basis, each with its own public involvement process. Separate from TM process.
	Implementation; Maps	How will you get this out to the general public?	It will take a while to work out a good system; the MVUM will be free of charge. Your ideas and input on how we can accomplish this are welcome.
L13	Road-specific questions/comments	Do the proposed changes affect access to road leading into short trail into Gordon Meadows?	No; motorized access on those roads will remain open

Letter number	Subject of concern	Comment	Forest Service Response
L43	Santiam Pass or Huckleberry	In what way does this affect the Big Lake/Hoodoo area ATV use?	Big Lake is within the Santiam Pass Recreation Area which has a separate planning process for developing an OHV trail system. Interested publics should contact the McKenzie RD for details on this planning effort.
L43	Santiam Pass or Huckleberry	Are ATVs still going to be allowed to ride on trails next to the paved road that goes around and into West Big Lake?	Big Lake is within the Santiam Pass Recreation Area which has a separate planning process for developing an OHV trail system. Interested publics should contact the McKenzie RD for details on this planning effort.
L43	Santiam Pass or Huckleberry	What about ATV use of the Old Santiam Wagon Road?	Big Lake is within the Santiam Pass Recreation Area which has a separate planning process for developing an OHV trail system. Interested publics should contact the McKenzie RD for details on this planning effort.
L43	Santiam Pass or Huckleberry	At the entrance to the main campground at Big Lake where ATVs have made a huge dust bowl will this be off limits?	Big Lake is within the Santiam Pass Recreation Area which has a separate planning process for developing an OHV trail system. Interested publics should contact the McKenzie RD for details on this planning effort.

Appendix C: Travel Management Maps

Figure 1: Detroit Ranger District

Figure 2: Sweet Home Ranger District

Figure 3: McKenzie River Ranger District; McKenzie Area

Figure 4: McKenzie River Ranger District; Blue River Area

Figure 5: Middle Fork Ranger District; Lowell Area

Figure 6: Middle Fork Ranger District; Oakridge Area

Figure 7: Middle Fork Ranger District; Rigdon Area