

CHAPTER 1

PURPOSE AND NEED FOR ACTION

Changes from the Draft to the Final EIS

In the Draft EIS amendment of the Gallatin National Forest Land and Resource Management Plan (Forest Plan) was proposed to remove existing direction pertaining to the management of travel and incorporate the Travel Management Plan as part of the Forest Plan. In the past few years Agency thinking has evolved to the point that Forest Plans are strategic documents, they do not make final agency action decisions. This thinking culminated in the revision, in January of 2005, of the regulations for implementing the National Forest Management Act (NFMA) at 36 CFR 219. The Forest Service no longer proposes to incorporate the route designation and decisions and programmatic direction of the Travel Management Plan as part of the Forest Plan. Instead, the Travel Management Plan would be a stand-alone document. In summary, the revised regulations at 36 CFR 219 direct that Forest Plans no longer make final agency decisions. The proposed Travel Management Plan would make final agency decisions (e.g. appropriate uses of roads and trails) and therefore would not be consistent with the principles of a revised Forest Plan. This change makes no practical difference. The Travel Management Plan would still be the guiding document for managing public access and travel within the Gallatin National Forest. Amendment of the Forest Plan is limited to a proposal to remove existing direction pertaining to the management of travel.

Introduction

This Environmental Impact Statement (EIS) discloses the potential environmental consequences of implementing alternatives for managing public access and travel within the Gallatin National Forest, Montana. This EIS, in conjunction with public comment, legal requirements and other information will be used to establish a Travel Management Plan for the Forest. The Travel Management Plan will identify and establish opportunities for public recreation use and access using the Forest's road and trail system. For each road and trail it will specify the types of uses that are appropriate including passenger car pleasure driving, high clearance vehicle use, ATV use, motorcycle use, biking, horseback riding, snowmobiling, hiking, skiing and snowshoeing. The Plan will also establish travel management goals, objectives, standards and guidelines for the Forest as a whole and specific sub-areas referred to as Travel Planning Areas (TPAs). Goals and objectives provide a basis for future site-specific action proposals for management of the transportation system while standards and guidelines identify sideboards (or limitations) within which those actions must be designed. In conjunction, the current direction pertaining to management of the transportation system is proposed to be removed from the Gallatin Land and Resource Management Plan (Forest Plan).

This EIS has been prepared as required by the National Environmental Policy Act (NEPA), The Council on Environmental Quality Regulations for implementing NEPA provisions (40 CFR 1500), the National Forest Management Act and its accompanying regulations, as well as applicable Forest Service Manuals, Handbooks and other higher-level direction.

Background

The Gallatin National Forest's road and trail system was created over time; influenced by a number of factors including land ownership patterns, use of Forest resources, legislation, recreation demand and changes in public attitudes. Public recreation use of this system has grown significantly and the types of uses enjoyed are more varied than they were 20, 50 and 100 years ago. There was no grand plan that led to the development of roads and trails or the types of uses we see on them today. This development is a reflection of the needs and desires of our culture throughout the history of the Forest.

Much of the Forest, outside of what is currently Wilderness, was and is in a checkerboard ownership pattern with alternating sections of public and private land. These private inholdings originated as part of the construction grants that Congress made to the Northern Pacific Railway Company in the late 1800s and early 1900s. Other private inholdings exist due to patented mining claims and tracts acquired through the 1906 Forest Homestead Act.

From the mid-1880s to 1910, the prominent uses of the Forest and private inholdings were for timber harvest (railroad tie hacking), livestock grazing and mineral extraction. Along with these uses came the need for road and trail access, particularly in the more accessible portions of tributaries to the Gallatin and Yellowstone Rivers and in the Hebgen Lake Basin area. Automobiles were first permitted in Yellowstone National Park in 1915 and this led to additional recreation use along access routes to the Park. From about 1910 to 1930, dude ranches became common, further adding to the development and use of the trail system. During the 1930s, the concepts of "wilderness" or "primitive" areas began to emerge, leading to the establishment of the Spanish Peaks, Absaroka, and Beartooth Primitive Areas. In the 1950s, grazing was declining and outfitter-guide operations for big game hunting began to expand. Horse travel in the backcountry grew accordingly. The post-WWII era saw increased demands for wood products, and this, coupled with advances in machinery, led to pressure for more rapid development of road systems into undeveloped forested backcountry. Since timber harvest from railroad land and other private inholdings required the development of road systems across the checkerboard National Forest System lands, a formal cost-share road construction program began on the Gallatin in the early 1960s and continued into the late 1980s. Development for timber harvest continued, but public interest in the protection of other non-commodity resources and preservation of undeveloped land grew in the 1960s. This decade brought the passage of the Multiple Use-Sustained Yield Act, the Wilderness Act and the National Environmental Policy Act. Throughout the 1970s and 1980s, timber harvest on the Gallatin National Forest became more and more controversial, while recreation use of the trail system continued to grow. The Absaroka-Beartooth Wilderness was established in 1978 and the Lee Metcalf Wilderness was established in 1983, providing a permanent prohibition on mechanized use or development in these areas. Snowmobiling became popular, particularly in the West Yellowstone area, during the 1970s and use levels have grown to this day.

Up until the 1980s, public recreation use and travel on the Gallatin National Forest was not considered something that required much management control. It was not controversial and National Forest System lands and resources seemed capable of handling the variety of uses enjoyed by the public, including off-route vehicle use. Since that time, increasing demand, new information on the potential effects to resources, and diverse personal value sets have raised more attention and

concern as to how the public uses the Forest. There has never been a comprehensive analysis or management plan for travel on the Gallatin National Forest. The Forest Service believes that the demand for some recreation opportunities may now be reaching the point of exceeding the capability of the land to provide them. A Travel Management Plan is needed to effectively offer a variety of quality recreation opportunities consistent with achieving management goals and objectives for other resources.

General Location and Geographic Setting

The Gallatin National Forest contains approximately 1.8 million acres of National Forest System land and is located along the northern and western boundaries of Yellowstone National Park in southwest Montana (See Figure 1.1). The Forest spans portions of Madison, Gallatin, Park, Meagher, Sweet Grass and Carbon Counties. Offices are located in the cities of Bozeman, Livingston, Big Timber, Gardiner and West Yellowstone. The Gallatin National Forest includes lands in the Bridger, Bangtail, Crazy, Absaroka, Beartooth, Gallatin, Henry's Lake and Madison Mountain Ranges. Major rivers include the Gallatin, Madison and Yellowstone Rivers.

Included in the Gallatin National Forest are the Lee Metcalf Wilderness Area and the Absaroka-Beartooth Wilderness Area covering approximately 716,000 acres. Also included are the Cabin Creek Recreation and Wildlife Management Area (approximately 37,000 acres) and the Hyalite/Porcupine-Buffalo Horn Wilderness Study Area (approximately 155,000 acres). In addition to these areas, approximately 704,000 acres of National Forest land have been inventoried as roadless. The remaining Forest lands have been mostly roaded and developed for mineral entry and timber production.

Proposed Action

The U.S. Forest Service, Gallatin National Forest, is proposing to adopt a management plan for public access and travel within the Gallatin National Forest. The proposed Travel Management Plan would identify and establish opportunities for public recreation use and access using the Forest's road and trail system. For each road and trail, it would specify the types of uses that would be allowed and managed for. Specified uses include passenger car pleasure driving, high clearance vehicle use, ATV use, motorcycle use, biking, horseback riding, snowmobiling, hiking, skiing and snowshoeing. The Travel Plan would also establish goals, objectives and standards that provide guidance for future management activities related to public access and travel. This EIS discloses the results of evaluating seven possible alternatives. These are described in Chapter 2 of this EIS and also in a separate document, "Detailed Description of the Alternatives." In general, the actions proposed under the proposed alternatives are as follows.

Establishment of Forest-wide Goals, Objectives, Standards and Guidelines for Travel Management

As part of the Travel Management Plan, the Forest Service proposes to adopt broad goals, objectives, standards and guidelines for travel management that would apply Forest-wide. "Goals" describe, in general terms, the desired results to be achieved through implementation of the other direction provided by the Travel Management Plan. "Objectives" are statements identifying a

measurable target for the planning period designed to move toward achieving goals. For travel planning, Forest-wide objectives identify desired measurable targets for activities, use levels, or quality of experience. “Standards” are binding limitations placed on management activities, not covered by law or regulation, that are designed to maintain a specified minimum level of resource protection. Proposed standards would establish sideboards within which future road and trail construction, reconstruction, decommissioning or maintenance must take place. Management activities must be designed to be consistent with a standard unless the Travel Management Plan is changed. “Guidelines” are preferable or advisable limits placed on management activities. Guidelines are similar to standards except they are non-binding. Future road and trail construction, reconstruction, decommissioning or maintenance activities can deviate from a guideline. A guideline is used to direct management activities when there could be variability in specific situations such that a standard becomes too rigid. The specific goals, objectives, standards and guidelines proposed under Alternatives 2 through 7-Modified (7-M) are described in the document, “Detailed Description of the Alternatives.” Alternative 1 would not adopt proposed forest-wide direction.

Establishment of Travel Planning Area Goals, Objectives, Standards and Guidelines for Travel Management

To facilitate clarity the Gallatin National Forest was geographically divided into 39 Travel Planning Areas (TPAs) (Figure 1.1). For each of these areas, the Forest Service proposes a unique set of goals, objectives, standards and guidelines. Goals and objectives would serve the same purpose as they do Forest-wide except that they are tailored to apply to specific locations. Goals and objectives set desired results and measurable targets to be achieved with travel management activities within the TPA.

Similarly, standards and guidelines established for TPAs would serve the same purpose as Forest-wide standards and guidelines, but again they are unique to that area. Standards and guidelines would be used to set sideboards on future projects and activities related to travel in order to ensure protection of various resources. At the TPA-scale, standards and/or guidelines are proposed due to a unique resource protection need in that area.

The specific TPA goals, objectives, standards and guidelines proposed under Alternatives 2 through 7-M are described in the document, “Detailed Description of the Alternatives.” Alternative 1 would not adopt proposed TPA direction.

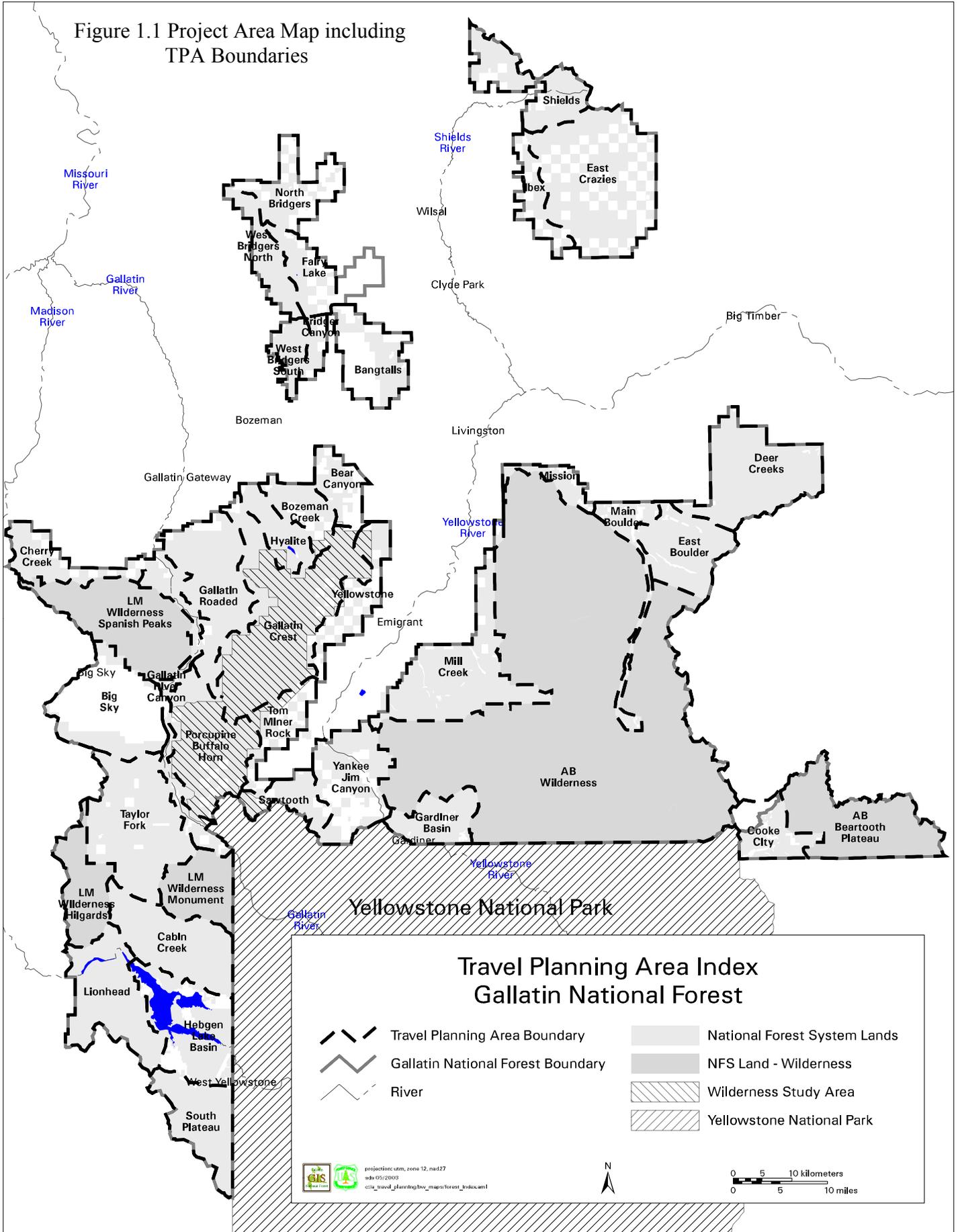
Designation of the Modes of Travel Permissible and Managed for in Specific Areas and on Specific Roads and Trails of the Gallatin National Forest

The Forest Service is proposing to identify and regulate the means of public travel across the Gallatin National Forest, including travel that occurs on specific roads and trails. In summary, this proposal contains the following components:

Motorized Use

The proposed action would restrict summer motorized use to designated routes. Snowmobiling would be permitted off-route unless specifically restricted.

Figure 1.1 Project Area Map including TPA Boundaries



Passenger Car Travel

The proposal would designate up to 420 miles of the Gallatin National Forest road network for passenger car travel. This proposal includes seasonal restrictions that would be designed to protect facilities as well as other resources. The Forest's central arterial road system may be nominated as Potential Public Forest Service Roads (PFSRs). A PFSR is a National Forest road that may serve a variety of purposes (similar to a county road) where the construction and maintenance is paid for out of the Federal Highway Trust Fund. The PFSRs are identified on the summer motorized alternative maps.

4 x 4 High-Clearance Vehicle Travel

The proposal would designate up to 415 miles of the Gallatin National Forest road network for 4 x 4 high-clearance vehicles. This is in addition to 420 miles of road that would also be designated for passenger car travel. Seasonal restrictions would be adopted to protect road facilities and other resources.

ATV Travel

The proposal would designate up to 375 miles of Gallatin National Forest road and 285 miles of trail for ATV use. Passenger car roads would also be available for properly licensed ATVs and riders. Seasonal restrictions would be adopted to protect road and trail facilities and other resources.

Motorcycle Travel

The proposal would designate up to 460 miles of trail for motorcycle use. Additionally, trails designated for ATVs and roads designated for high-clearance vehicles are also available for motorcycle use. Passenger car roads would be open to properly licensed motorcycles and riders. Seasonal restrictions would be adopted to protect road and trail facilities and other resources.

Mountain Bike Riding

The proposal would emphasize mountain bike use on up to 1,270 miles of trail. This includes trails that are also open to motorcycles and trail open to ATVs. For the most part, the proposal would not restrict mountain bike use elsewhere except in Wilderness areas and during the spring when trail facilities are wet, soft and prone to damage. Consideration is being given, in some alternatives, to prohibiting or limiting mountain bike use within the Hyalite/Porcupine-Buffalo Horn Wilderness Study Area, recommended wilderness, and on short trail segments that lead to designated Wilderness.

Horseback Riding

Generally, the proposal would allow use of pack and saddle stock anywhere on the Forest, but it would not be emphasized on roads and some trails open to ATVs. Consideration is being given to restricting use during the spring when facilities are wet, soft and prone to damage. Year-round restrictions are also being considered in the steep, rocky, high-elevation terrain of the Beartooth Plateau and on the Lava Lake, Pine Creek and Sunlight trails.

Hiking

The proposal would allow hiking/walking anywhere on the Forest at any time of year, however certain trails would be designated as non-motorized to provide for quiet, primitive and semi-primitive experiences.

Snowmobiling

The proposal would designate up to 520 miles of marked and groomed snowmobile trail and snowmobile use would be legally permissible off-route on up to 949,000 acres. In contrast, consideration is also being given to restricting snowmobile use on up to 584,000 acres excluding designated Wilderness that is already restricted by law.

Cross-country Skiing and Snowshoeing

The proposal would designate up to 260 miles of marked and groomed ski trail across the Gallatin National Forest. Otherwise, no consideration is being given to restricting skiing or snowshoeing anywhere on the Forest.

Small Aircraft Landing Strips

Alternatives 3 and 7-M includes an objective (Forest-wide Objective A-6) to consider potential future proposals to authorize locations for landing/take-off of backcountry aircraft (airplanes and helicopters). Landing/take-off locations that are authorized would be constructed and maintained by site users. Proposals would be processed in accordance with regulations for occupancy and use of National Forest System lands. Use would be regulated by special use authorization. If the objective was adopted into the Travel Plan, future site-specific analysis under NEPA would be required before any sites are approved, constructed or permitted for landing and take-off. Table 1.1 displays the general locations where the Montana Pilots Association desires airstrips.

Table 1.1 Desired general locations of backcountry airstrips.

Name	Location and Description
Bangtail Cabin Area	This area is located in Sections 7 and 8, T.1 S., R.8 E. of the Bridger Bangtail Range to the north of Bangtail Cabin.
Bishop Park Area	This area is located in Sections 31 and 36, T.1 N., R.7 E. of the Bridger Bangtail Range southwest of Bishop Park.
Upper Shields Area	This area is located in Sections 15 and 16, T.5 N., R.11 E. of the Shields River drainage in the northern end of the Crazies.
Porcupine Cabin Area	This area is located in Section 10, T.4 N., R.10 E. of the Crazies just to the north of Porcupine Cabin.
Bald Ridge Area	This area is located in Section 2, T.4 N, R.10 E. of the Crazies northeast of the Porcupine Cabin.
Horse Butte Peninsula	This area is located in Section 15, T.13 S., R.4 E. of Horse Butte Peninsula as it juts into Hebgen Lake.
South Plateau Area	This area is located in Section 21, T.15 S, R.5 E. on the Idaho border of the Madison Plateau south of West Yellowstone.
Ferrell Lake Area	This area is located in Sections 25 and 26, T.7 S., R.6 E. on the north shore of Ferrell Lake in the lower Tom Miner Basin.

The types of opportunities proposed for each specific route under the seven alternatives are described in tables under the direction for each Travel Planning Area in the document, “Detailed

Description of the Alternatives.” They are also displayed on the separate alternative maps that are available electronically.

Adoption of programmatic direction (Goals, Objectives, Guidelines) for “Access”

Within the proposed forest-wide programmatic direction presented in Chapter I of the “Detailed Description of the Alternatives”, the Forest Service proposes a goal, objectives, and guidelines that emphasize acquiring and protecting public and/or administrative access to all Gallatin National Forest land. One proposed objective includes a table and map that identifies specific locations and the type of access that would be desired. For Alternative 7-M refer to Goal B, Objectives B-1 through B-3, and Guidelines B-4 to B-9 in Chapter I of the “Detailed Description of the Alternatives”.

Amendment to Remove Specific Management Direction from the Existing Gallatin National Forest Land and Resource Management Plan

The proposed Forest Plan amendment would remove certain existing Gallatin Forest Plan standards and guidelines applicable to roads, trails and travel management. A list of these standards and guidelines and the reason for removal is provided in Appendix A.

Development of a Monitoring Plan Associated with Travel Management

In conjunction with the proposed actions described above the Forest is developing a monitoring plan that, over time, will:

- 1) Facilitate the gathering of information to periodically evaluate progress toward meeting the established goals and objectives of the Travel Management Plan and whether implementation is occurring as prescribed.
- 2) Facilitate the gathering of information to periodically assess whether the actual effects of the Travel Management Plan are consistent with those predicted in this EIS, and if not, to help determine what, if anything, should be changed in the Travel Management Plan to correct any problems.

The monitoring plan is described in Appendix B of this FEIS.

Need and Purpose

Need for a Gallatin National Forest Travel Management Plan

In general, the road and trail system and recreation use on the Gallatin National Forest have evolved incrementally over many decades based on site-specific demands and capabilities. There has never been a comprehensive evaluation on whether it is the best way to provide for these demands in conjunction with other resource uses and land stewardship needs. Due to the trends in recreation use and travel on the Forest, the acquisition of new land into public ownership, and the many

resource and environmental protection issues that have emerged, it is appropriate for the Gallatin National Forest to develop a travel management plan. A detailed description of the need follows.

Recreation and Travel Trends

Use of Gallatin Forest roads and trails has changed substantially since the Forest Plan was signed in 1987. Hiking, fishing and wildlife viewing activities have increased substantially. Uses of snowmobiles and ATVs have grown in popularity. The Forest is the destination for thousands of snowmobiling visitors, particularly near Cooke City and West Yellowstone. ATVs, while rare in 1987, have become common on many Forest roads and trails. Providing opportunities for mountain bike use was not considered 15 years ago, but has evolved into a popular sport today. Trail and backcountry skiing have also increased. Past incremental management changes that the Forest has made have been insufficient to address changes in the types of use and their effects on Forest resources and recreational opportunities and experiences.

Montana/North Dakota Statewide OHV Decision

In January 2001, the Regional Forester signed a decision that bans cross-country summer motorized travel. The decision amended all Montana National Forest Plans and “*established a new standard that restricts yearlong, wheeled vehicle motorized cross country travel where it is not already restricted.*” This is a major change in the way the Forest has been managed. Previously areas were open to motorized use, that is, vehicles were not restricted to roads or trails. The Regional Forester decision also directs each Forest to do site-specific planning that will result in the designation of roads and trails for their appropriate uses. The Gallatin National Forest must now enter that phase of site specific travel planning that will lead to a decision of designating the uses of all system roads and trails.

Forest Service Regulations for Recreational Motor Vehicle Use

In November of 2005 the Forest Service announced revised regulations regarding travel management on National Forest System lands to clarify policy related to motor vehicle use (“Travel Management; Designated Routes and Areas for Motorized Use,” 36 CFR 212, 251, 261, and 295, Federal Register/Vol. 70, No. 216/November 9, 2005). This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. The Gallatin National Forest has committed to meeting this new direction in fiscal year 2006 through this proposed travel planning process.

Land Acquisition

Over the last ten years, the Gallatin National Forest has acquired more than 140,000 acres of land. Much of it has been heavily harvested and includes an estimated 700 miles of roads that were constructed at a low standard. Most of these roads have been open to the public, even while in private ownership. Low standard roads and high open road density can have detrimental impacts on soils, water quality, fish and wildlife habitat. Many of the trails on these acquired lands are also in disrepair. Travel planning is needed to determine the appropriate management for these routes and to identify excess routes that should be closed and rehabilitated.

Court Order on Montana Wilderness Study Areas

In May of 2001, the U.S. District Court of Montana ruled on a lawsuit brought against the Forest Service by three environmental groups challenging the management of lands designated for further Wilderness study under the Montana Wilderness Study Act (MWSA) (CV-96-152-M-DWM). The Court ruling directed the Forest Service to prepare an assessment of the current Wilderness character of these study areas in comparison to that which existed in 1977 when the Act was passed. The Gallatin National Forest contains the Hyalite/Porcupine-Buffalo Horn Wilderness Study Area (HPBH) that is located within the Gallatin Mountain Range. The Act did not preclude a continuation of the types of recreation activities that were occurring in 1977, including motorized use of the trails, but the Court found that the Forest Service could not establish that the pre-existing Wilderness character was being maintained. The types of motorized/mechanized trail vehicles have changed since that time. Since publication of the Draft EIS there have been additional developments regarding this case. As of May 2006, the parties of the lawsuit are considering the possibility of settlement. Regardless of that outcome travel planning is needed to determine the types and location of uses that can be managed for within the HPBH that would be consistent with the Montana Wilderness Study Act.

Grizzly Bear Recovery Zone

The grizzly bear recovery zone encompasses 800,000 acres in the southern portion of the Gallatin Forest surrounding Yellowstone National Park. Current Forest Plan direction for the recovery zone is to maintain core security areas free of motorized access routes and total motorized access route density in the remainder of the recovery area at the 1995 level. Travel planning is needed to meet this direction and to evaluate whether changes in motorized routes are needed in grizzly bear habitat.

Cutthroat Trout Conservation Strategy and Agreements

Westslope and Yellowstone cutthroat trout have a limited distribution on the Gallatin Forest. These are “sensitive species” for which statewide conservation strategies and agreements have been written. The strategies contain guidelines that are to be followed to assure that management activities will not degrade habitat in drainages containing westslope or Yellowstone cutthroat trout populations. Roads and trails, and associated construction, maintenance and use can produce sediment that enters streams, adversely affecting fish spawning habitat. Travel planning is needed to assess and correct any unacceptable effects that public travel, or roads and trails may be having in drainages that contain populations of cutthroat trout.

Lynx Amendment

The Canada lynx was listed as a threatened species under the Endangered Species Act in March 2000. Lynx have been documented, historically and currently, throughout the Rocky Mountains of Montana. The effects to lynx has been identified as an issue as it relates to the existing transportation plan and proposed Travel Plan alternatives. Research suggests that the presence of roads can negatively affect lynx and lynx habitat, directly and indirectly. In addition, lynx are a prey specialist, largely dependent on snowshoe hares, and usually occur in the habitats where snowshoe hares are most abundant (Claar et al. 1999). Lynx are specially adapted to survival in

deep soft snow regions, such as the higher elevations in the northern Rocky Mountains. Physical adaptations to deep snow give lynx a competitive advantage over other predators, which includes the coyote, bobcat and cougar. Outside of deep snow areas, these generalist predators are believed to exclude lynx through effective competition for food resources. There is a concern that compacted snow routes allow these other predators access up into areas that are normally the exclusive winter range of the lynx. Travel planning is needed to assess and correct any unacceptable effects groomed and marked snowmobile and ski routes (as well as play areas) may have on lynx and lynx habitat.

Other Resources

Other resources such as soils, riparian areas, designated Wilderness and big game winter range can also be sensitive to human travel within the Forest. A comprehensive evaluation through travel planning is needed to determine whether the various uses may be having unacceptable adverse effects on a variety of resources and whether adjustments in management should be made.

Need For Forest Plan Amendments

There are numerous existing Gallatin Forest Plan standards and guidelines applicable to roads, trails and travel management that are proposed to be removed in lieu of direction that would be established in a Travel Management Plan. These standards and guidelines are listed in Appendix A of this FEIS and Chapter III of the document, "Detailed Description of the Alternatives." In general, the current Forest Plan direction is outdated, does not really provide limitations on management activities, is open to misinterpretation or could be in conflict with the concept of establishing TPA and route-by-route management direction. The specific reasons for amending each of these standards is outlined in Appendix A, however these can be summarized as follows.

There is a need to remove existing Forest Plan direction to allow for the adoption of proposed direction.

The proposed travel management plan has been developed as a comprehensive management plan that includes Forest-wide and area-specific goals, objectives, standards, guidelines and route-by-route direction. It is intuitive that existing direction, that is now 17 years old, should be removed as a connected action. In addition, specific standards exist that would not be consistent with new direction proposed. These include:

- 1) The Forest Plan Forest-wide standard 6.a.4 (USDA 1987:II-18) states, "*The 1982 Elk Logging Study Annual Report contains procedures for analyzing elk habitat security as it is affected by timber harvest and road construction activities. An 'elk effective cover' analysis based on this report will be conducted for timber sales and effective cover ratings of at least 70 percent will be maintained during general hunting season.*" The Forest Service proposes to replace this standard of the current Forest Plan with specific decisions concerning motorized use in the proposed travel management plan. The principle reason for this amendment, in part, is that once a decision is made that identifies the designated routes on which summer motorized use is allowed, the need for a road density standard, which this one is, becomes moot. Open road density, motorized route density, and the habitat effectiveness rating will be a result of this

decision, not the other way around. Also, if this standard was left in the Forest Plan, the proposed Travel Plan would not be consistent with it in many areas of the Forest. Please refer to Appendix A for a more detailed description of the purpose and need for amending this standard.

- 2) The Forest Plan Forest-wide standard 13.9 (USDA 1987:II-28) states, “*Existing roads and trails will be maintained consistent with management area goals.*” The Forest Service is proposing to remove this standard in lieu of the more detailed goals, objectives, standards and guidelines proposed in this Travel Management Plan. The above standard is vague, but it could also be misinterpreted such that it would conflict with some of this new direction. For example, proposed Forest-wide Objective C-1, under Alternatives 2 through 6 would direct the agency to “close and rehabilitate existing roads in excess to administrative, recreation and access needs.” In Management Area 6, this could be interpreted to be inconsistent with the existing goal to “*provide additional public access to these areas.*”
- 3) Within the Management Area direction of the Forest Plan, the Forest Service is proposing to remove standards that direct recreation use to be managed to meet certain “Recreation Opportunity Spectrum (ROS)” classes. There are two principle reasons for this amendment. First, the Forest Plan Management Areas are not place-based; they are scattered throughout the Forest and there may be a number of different Management Areas within a given drainage. Managing for different ROS classes within the same general area is not practical or desirable. Second, changes in public recreation demand led to a need to consider changes in the current recreation settings being provided. The route-by-route management decisions of the Travel Management Plan may not be consistent with certain Forest Plan ROS classifications, although this is difficult to ascertain.
- 4) Management Area 11 of the Forest Plan contains a standard to: “*Implement road use restrictions to achieve an elk habitat effectiveness level of at least 60% or a specified elk hunter opportunity objective.*” There is a need to remove this standard for the same reasons as discussed for the forest-wide standard to maintain elk effective cover ratings of 70% (Forest Plan standard 6.a.4, USDA 1987: II-18). Note that this Management Area standard has always been moot because the Forest-wide standard is more restrictive.

Another reason for removing the existing Forest Plan direction relative to travel management is that it was not well written. Goals, objectives, standards and guidelines (see the definitions in the Glossary) were used interchangeably. Many of the “standards” in the current Forest Plan reflect a belief of Forest managers during the 1980s that once the Forest Plan EIS was completed, NEPA requirements were met for all subsequent management activity covered by the Plan. In other words, it was believed that the Forest Plan would be the one and only decision level. It was later established that there was a need for a second decision level, subject to NEPA, for making decisions for final agency actions. A “standard” should be an expression of a binding limitation on future actions that may be proposed. Many of the current standards being proposed for amendment are not written as “binding limitations” rather they are written as decisions designed to permit categories of activity. These standards are now considered inappropriate and therefore should be removed as Forest Plan direction.

There is an opportunity to remove unnecessary or redundant direction pertaining to travel management from the Forest Plan.

Most of the standards proposed for amendment do not conflict with the proposed travel management plan but should be removed because they are outdated and do not provide any meaningful direction. The current Gallatin Forest Plan was the first one prepared on this Forest under the National Forest Management Act (NFMA). At that time, Forest managers believed it was important to inform the public of existing policies even though they did not set specific objectives to be achieved or standards that would establish sideboards on management action.

For example, Forest-wide standard 16.h. (USDA 1987:II-28) pertaining to eligible Wild and Scenic River segments states that *“motorized travel on land or water may be permitted, prohibited or restricted. Controls will usually be similar to surrounding lands and waters.”* It is apparent that this standard provides no direction at all. Any action would be consistent with this standard and therefore it is unnecessary.

Another example is Forest-wide standard 12.b.5 (USDA 1987:II-27), which states, *“Rights-of-way across National Forest lands will be granted in situations involving a statutory right of access, subject to compliance with applicable rules and regulations of the Secretary of Agriculture.”* This statement is redundant to direction already established by law, regulation, and policy. There is no need for the Forest Plan to simply state that laws, rules and regulations will be followed.

The Forest Service views the travel planning process as an opportunity to remove these unnecessary and redundant statements related to travel management from the Forest Plan.

There is a need and opportunity to remove procedural direction relating to travel management from the Forest Plan.

Several Forest Plan standards proposed for amendment establish procedures to follow or specific publications to use in evaluating the effects of proposed actions. In implementing the Forest Plan, it was learned that this type of direction is inappropriate because analysis processes change rapidly and often new, better information becomes available.

For example, Forest-wide standard 13.1 (USDA 1987:II-27), states, *“Analysis for transportation needs will be integrated into resource area analysis and will be completed prior to transportation project work.”* The Forest Service is proposing to amend this direction out of the Forest Plan because the “Resource Area Analysis” (RAA) process is no longer used. RAA was a process unique to the Gallatin National Forest used during the 1980s. It was developed in attempt to meet the requirements of NEPA for multiple projects within a given area. Subsequent appeals of decisions made through this process however showed that it was not legally sufficient to meet some the specific requirements of NEPA and therefore was discontinued. Today, transportation system proposals would be evaluated through an environmental assessment or environmental impact statement.

Another example is Forest-wide standard 6.a.2 (USDA 1987:II-17), that directs that the recommendations and guidelines found in the publication, “Coordinating Elk and Timber

Management, Final Report of the Montana Cooperative Elk-Logging Study 1970-1985” will be used in evaluating and formulating prescriptions for timber sales and road development projects. While this report is still useful, when new information becomes available this publication may no longer be applicable in certain situations and therefore the Forest Plan should not direct that it be used. NEPA requires federal agencies to use accurate scientific analysis in evaluating impacts of proposed actions (40 CFR 1500.1). They must also consider and disclose research and other information that may or may not support the same conclusions. Removing this standard from the Forest Plan will allow Forest Service biologists to select and use the scientific publications that best predicts environmental effect.

It should be noted that many of the standards listed for amendment are statements of good intention regarding protection of the environment. For example, there may be direction to manage the road and trail system such that it minimizes sediment delivery to area streams or such that it provides for good wildlife habitat. Amendment of the Plan to remove these standards is not because the Forest Service disagrees with these principles, it is simply because the wording of the direction is not consistent with what a standard should be. Again, a “standard” should be a binding limitation on management activity. It must be specific such that compliance can be precisely measured. As stated above new standards are being proposed as part of this Travel Plan.

Purpose for a Gallatin National Forest Travel Management Plan

The purpose for the proposed Gallatin National Forest Travel Management Plan is to:

- 1) Provide for public access and recreation travel on the Gallatin National Forest considering both the quantity and quality of opportunities provided.
- 2) Bring area, road and trail use into compliance with laws, regulations, and other higher-level management direction.
- 3) Establish objectives and/or restrictions to correct any unacceptable resource damage that is occurring due to the use of Forest roads, trails and areas open to cross-country travel.
- 4) Provide for public understanding of the types of use and season of use allowed for each road and trail.
- 5) Remove outdated, ineffective, and/or unclear existing Forest Plan standards and other direction applicable to road and trail management.
- 6) Identify administrative access routes to facilitate management of a variety of resources on the Gallatin National Forest.

Decisions To Be Made

Decisions that are to be made through the travel planning process are as follows:

- 1) To decide whether to adopt proposed Forest-wide goals, objectives, standards and guidelines for recreation and travel management of the Gallatin National Forest (Chapter I of the “Detailed Description of the Alternatives”).
- 2) To decide whether to adopt proposed travel planning area direction including travel planning area goals and objectives, standards and guidelines for specific areas of the Gallatin National Forest (Chapter II of the “Detailed Description of the Alternatives”).

- 3) To determine the types of uses and season of use that are appropriate for each road and trail (including potential new routes) on the Gallatin National Forest considering other resource impacts and the quantity and quality of recreation opportunities provided (Chapter II of the “Detailed Description of the Alternatives, Alternative Route-by-Route Management”). The types of travel to be considered include the use of passenger cars, 4 x 4s, ATVs, motorcycles, mountain bikes, pack and saddle stock, foot, snowmobiles, skis and snowshoes.
- 4) To decide whether to restrict summer motorized uses (cars, trucks, SUVs, ATVs and motorcycles) to specific routes designated for such use.
- 5) To decide what areas, if any, should be restricted (either permanently or seasonally) to snowmobile, mountain bike, or pack and saddle stock use.
- 6) To decide whether to amend the Gallatin Forest Plan to remove certain existing standards applicable to road and trail management (Chapter III of the “Detailed Description of the Alternatives”).

Scope of the Decision

The following is intended to further clarify the scope of the decisions that will or will not be made through the Travel Management Plan.

1. This decision does not affect management direction set through laws, regulations, executive orders, national and regional Forest Service policy, or separate amendments to the Gallatin Forest Land and Resource Management Plan (Forest Plan). This point is relevant to the proposed programmatic direction of the Travel Management Plan in that it is not intended to be inclusive of all management direction that may apply to a future proposal. Additional requirements may also need to be considered. This decision would also not affect prohibitions on travel pursuant to 36 CFR Part 261 – Prohibitions to provide short-term resource protection (up to 12 months) or to protect public health and safety.
2. Final agency decisions for road and trail construction, reconstruction, maintenance and decommissioning are not being made through this Travel Management Plan. The Plan does, however, include objectives for such future proposals.
3. Route-by-route decisions are limited to the types of uses and season of use that is appropriate for each road and trail (including potential new routes) on the Gallatin National Forest. The codes included in the route tables indicating whether a permissible use is “emphasized” (E) or “allowed” (A) are provided for information purposes. The distinction discloses whether the use would be actively managed for or simply allowed through the Travel Plan. One example would be use of the Hyalite Road. It’s a heavily used paved road and therefore passenger car travel would be emphasized (E) while foot and horse travel would be allowed (A). In other words the Forest Service would not consider nor manage this road as a good hiking or horseback riding opportunity nor would they recommend it to users as such.
4. Final agency decisions to open, construct, or reconstruct routes for future administrative or project activity are not being made through this Travel Management Plan although it would establish direction within which such future proposals must take place (i.e. standards and guidelines).

5. The monitoring plan is not a decision to be made rather it is a tool to assure that the travel plan decisions are carried out (See 40 CFR 1505.2(c) and 1505.3).

6. The route-by-route decisions of this Travel Management Plan are “corridor” decisions. In other words they will determine whether different types of uses are allowed between point A and point B along a given route corridor. For roads, corridors include associated turnouts, trailheads, parking facilities, driveways (e.g. short access routes to private residences, campsites or fishing access sites), and any short segment of a connecting road up to a gate, barricade or other terminal facility. In other words the same uses allowed on the main road would be permissible on these facilities unless specifically restricted through another decision. Examples of site-specific restrictions could include a prohibition on public car travel along a driveway to a private residence or the closure of an access route to a dispersed campsite for resource protection and/or re-vegetating of the site.

7. The decision will identify certain Forest Service roads for nomination into the Public Forest Service Road (PFSR) program. The PFSR program is a Congressionally-driven program to fund the backbone road system on Forests with Highway Trust funds (federal gas tax receipts) as opposed to appropriated funds. In the late 1990s all Forests, including the Gallatin, nominated candidate roads for Congress to consider as potential PFSRs, however this process did not include public involvement. Therefore, as part of the proposed travel management plan, the Forest Service is identifying potential PFSRs for public comment. The result will be a pool of PFSR candidates that this Forest may continue to nominate to the national program for funding. Initial funding would be used to reconstruct the roads following satisfactory completion of NEPA procedures. Once reconstructed and approved, the roads become full-fledged PFSRs receiving federal funding for ongoing maintenance. Jurisdiction over a PFSR may change from the Forest Service to a willing local county government.