



United States
Department of
Agriculture

Forest
Service

TMR Supplemental Biological Resources Analysis for the 2010 Motor Vehicle Use Map

Chequamegon-Nicolet National Forest



NOTE TO READER: To protect Sensitive Species locations, I have substituted all road numbers with the generic road number "XXXX." -Matt St. Pierre 3/22/2010.

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Date: March 12, 2010

Introduction

In spring 2009, the first Motor Vehicle Use Map (MVUM) was published for the Chequamegon-Nicolet National Forest (CNNF). Allowable motorized use on the roads of the CNNF is determined by an interdisciplinary team of CNNF staff and these uses are displayed on that map. Following the publication of the MVUM, substantial public outreach and education as well as internal (CNNF personnel) review of the MVUM has resulted in a number of corrections and recommended changes to the allowable motorized use on the roads of the CNNF.

In this Supplement to the Biological Evaluations (B.E.) document I prepared for the 2008 Travel Management Project Environmental Assessment (Project Record document: PR 6302) that accompanied the 2009 MVUM, I disclose the environmental consequences of the changes to the MVUM. This discussion of effects is the second supplement to the analysis of my April 2008 B.E. (PR 5402 & 5401). My first B.E. supplement followed an interdisciplinary review of motorized use designation of approximately 120 roads not considered in the 2008 E.A.

The roads considered in this B.E. Supplement were evaluated by an interdisciplinary team (including me) for their suitability for motorized travel by Highway Legal Vehicles (HLV) and All-terrain Vehicles (ATV) following the Roads Analysis Process (RAP). Two RAPs were conducted; the first (Oct. 28-30, 2009) considered road comments received since the publication of the 2009 MVUM and the second (Jan. 19-21, 2010) considered comments that were received as a response to public outreach after the Oct. 2009 RAP.

For these RAP analyses, risk to Regional Forester Sensitive Species were rated as follows:

- Very Low Risk (**0**): Road is **beyond ½ mile** of a nesting, denning, or breeding site for TES wildlife.
- Low Risk (**1**): Road lies **within ½ mile** of a nesting, denning, or breeding site for TES wildlife or within 1,320 feet but a motorized road is between the occurrence and the road under review.
- Moderate Risk (**3**): Road lies **within 1320 feet** of nesting, denning, or breeding site for TES wildlife or within 660 feet but a motorized road is between the occurrence and the road under review.
- High Risk (**5**): Road lies **within 660 feet** of a nesting, denning, or breeding site for TES wildlife and no motorized road lies between the road and the occurrence.

Supplemental Analyses for the 2010 MVUM

The overall consequence ‘on-the-ground’ of the proposed 2010 MVUM update is an increase in motorized opportunity in the amount of 131 miles of roads open to highway legal vehicles, ATVs or both although this increase is masked by the aggregated effect of correcting mapping errors that incorrectly displayed 154 miles of road available for motorized travel (Table 1). Many of these map errors displayed roads that were closed with gates or berms as roads open to motorized vehicle travel.

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Table 1. Miles of travel corridors available for motorized use prior to this project (2008), displayed on the 2009 MVUM and under the proposed 2010 MVUM update.

Motor Vehicle Designation	Alt 1 (No Action)	2009 MVUM	2010 MVUM
ATV ONLY	2	6.52	12.31
BOTH HLV & ATV	485	477.74	526.25
HLV ONLY	4169	1,467.44	1,364.59
Grand Total	4656	1,951.71	1,903.15

Environmental Consequences – Wildlife

As noted in the 2008 Biological Evaluation document (see Table 4 in PR #5402) I prepared for the 2008 E.A., impacts to aquatic wildlife species were not analyzed in detail because motorized access within Riparian Management Zones, would not be increased under any alternative of this project (see 2008 EA). In this document, I supplement my impact analysis of the 2009 MVUM (as modified to create the 2010 MVUM) for wildlife species with documented occurrences in the vicinity of roads where the allowable motorized use is proposed for a change between the 2009 MVUM and the 2010 MVUM. Species for which no supplemental discussion is provided do not have any known occurrences in the vicinity of these roads or, as disclosed in the 2008 B.E., the project, no matter which alternative was selected; it did not impact the species.

Gray Wolf

Many of the roads (largely on the Chequamegon landbase) that were considered based on comments following the release of the EA were within wolf pack territories but very few were in close proximity to known denning or rendezvous sites. The designation of a motorized use on additional roads for the 2010 MVUM that previously were not designated for such use would have a small impact on the availability of motorized roads as described in the April 2008 B.E. Overall, the 2010 MVUM would provide slightly more motorized access than it did prior to the modifications but remains much less than that which was available prior to the publication of the 2009 MVUM. Therefore, relative to the conditions prior to publication of the 2009 MVUM (Alt 1 in the 2008 E.A.), the 2010 MVUM is a more favorable transportation system as far as wolves are concerned because there are fewer roads open to motorized use and a reduced potential for human/wolf interactions.

Bald Eagle

None of the roads proposed for adding/increasing motorized vehicle use under the 2010 MVUM were within ¼ mile of any known eagle nests therefore no change in the Determination of Effects is warranted.

Wood Turtle

None of the road segments considered for changes in the designation of allowable motorized use under the 2010 MVUM are within ½ mile of known wood turtle occurrences therefore no change in the Determination of Effects is warranted.

Marten

The proposed update to the 2010 MVUM as a result of public and internal recommended changes and vegetation management project decisions collectively result in a net increase of 0.74 miles of available motorized roads within known marten home ranges. More roads were proposed to be made unavailable for motorized use (2.46 miles) during the TMR process than were to be added to the MVUM (1.99 miles) but the decision on the Northwest Howell Project on the Eagle-River Florence Ranger District adds 1.33 miles of road open to highway legal vehicles to the MVUM. This increase between the 2009 MVUM and the proposed 2010 MVUM is trivial when compared to the reduction between pre-TMR and the MVUM (2009 or 2010; see Figure 1). No change in the Determination of Effects is warranted.

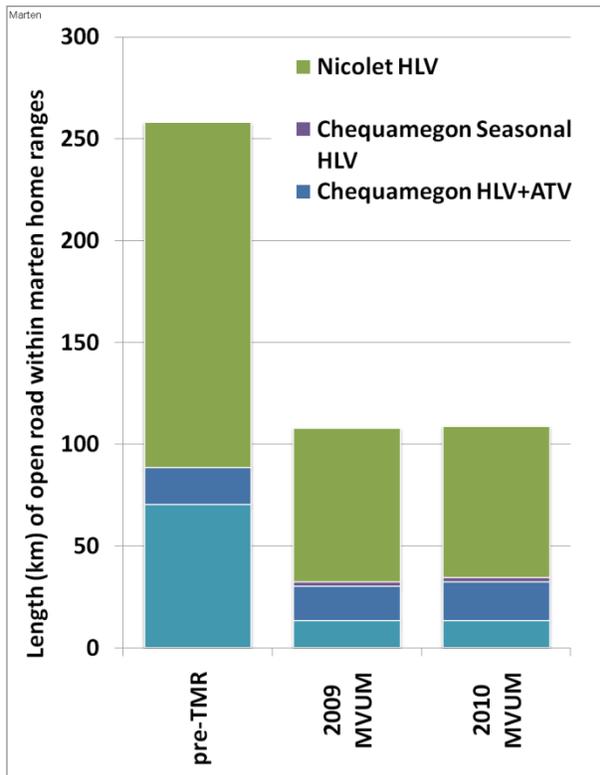


Figure 1. Length (kilometers) of motorized opportunity within marten home ranges.

Northern Goshawk

On the Nicolet side of the CNNF (ERFL), there is only one road designation change within 1 km of any known goshawk nest and that change is to a HLV road segment 1/3 of a mile long that is changed to no motorized access. Eliminating motorized access on that road (XXXX) would limit the disturbance to nest which may lead to a greater likelihood that the nest fledges some young.

On the Medford District of the CNNF, there is a goshawk nest adjacent (within 250 ft) to a gas tax road (XXXX) that is not within the scope for the TMR project. A FS road parallels that road roughly 600 meters away that is proposed to go from no motorized access to allowing Highway legal vehicles only. Because the nest is already adjacent to an open road, designating the

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additional road (FR XXXX) for highway legal vehicles is not expected to have an impact on the goshawk there.

On the Park Falls District, a goshawk nest is approximately 100 meters from XXXX. Along XXXX, a short spur road (0.09 miles) that was not on the 2009 MVUM is proposed to be added as a HLV-only road. This spur road (XXXX) is approximately 325 meters from the goshawk nest and is on the opposite side of FR XXXX from it. At this distance, and because the nest is on the opposite side of a highly traveled road (XXXX), use of XXXX by highway legal vehicles is unlikely to have any impact on goshawk using this nest.

On the Park Falls District, another a goshawk nest adjacent to a highly traveled road (XXXX) exists and there are spur roads in the vicinity that are to be put on the 2010 MVUM as open to highway-legal vehicles. In this case, XXXX (0.02mi; 225 meters away) and XXXX (0.19 miles, 475 meters away) are similarly too far away and would receive inconsequential motorized traffic relative to XXXX which is much closer to the nest.

Overall, the motorized use designations of roads as proposed under the 2010 MVUM would not represent a meaningful departure from the effects disclosed in the 2008 BE for the 2009 MVUM. Goshawk nests in the vicinity of roads with changing motorized use designations were all much closer to open roads that were to stay open.

Red-Shouldered Hawk

On the Lakewood Laona Ranger District, a red-shouldered hawk nest is approximately 390 meters from a road (XXXX) that is was seasonally open to Highway Legal Vehicles under the 2009 MVUM and would continue to be open to seasonal use but would allow ATVs too under the 2010 MVUM. Through the seasonal restriction on use, the nesting pair in this territory are not likely to be impacted by use on this road.

Another red-shouldered hawk nest on the LKLN District is immediately adjacent to a road (XXXX) that is proposed to allow highway legal vehicles under the 2010 MVUM (as a result of the McCaslin project decision) but did not allow motorized use under the 2009 MVUM. Because this nest was established while this road was open to motorized use, the nesting pair that established it may be somewhat tolerant to motorized use on this road. Nonetheless, motorized use of this road during the nesting season could disturb the birds as under the 2008 BE analysis of the Alternative 1. Impacts to this red-shouldered hawk nesting pair could be avoided through limiting use on this road to late-summer and fall access.

On the Medford landbase of the CNNF, a short road segment (XXXX) is open to HLV and ATV under the 2009 but this segment leads to an area with a red-shouldered hawk nest. Under the 2010 MVUM proposal, motorized access on this road would be limited to the fall season to avoid disturbing the pair during the nesting season.

No change in the Determination of Effects of the MVUM (2009 modified for 2010) are warranted but to mitigate the potential effect of motorized use on a red-shouldered hawk nest on the Lakewood Laona District, I recommend limiting motorized use on XXXX to the fall season.

Sharp-tailed Grouse, Henry’s Elfin, Tawny Crescent, Chryxus Arctic

Sharp-tailed grouse and the three barrens-associated butterflies are open-lands specialists that are not particularly sensitive to the presence of roads (*but see* PR 5402) but would be vulnerable to disturbances related to motorized users leaving the roadbed and traveling cross-country into the open lands this species prefers. The 2010 MVUM proposal is very similar to the 2009 MVUM in terms of total motorized road/trail opportunities (HLV, ATV or both) and would be expected to have the same range and magnitude of effects relative to the No Action Alternative (pre-TMR road system; see Figure 2).

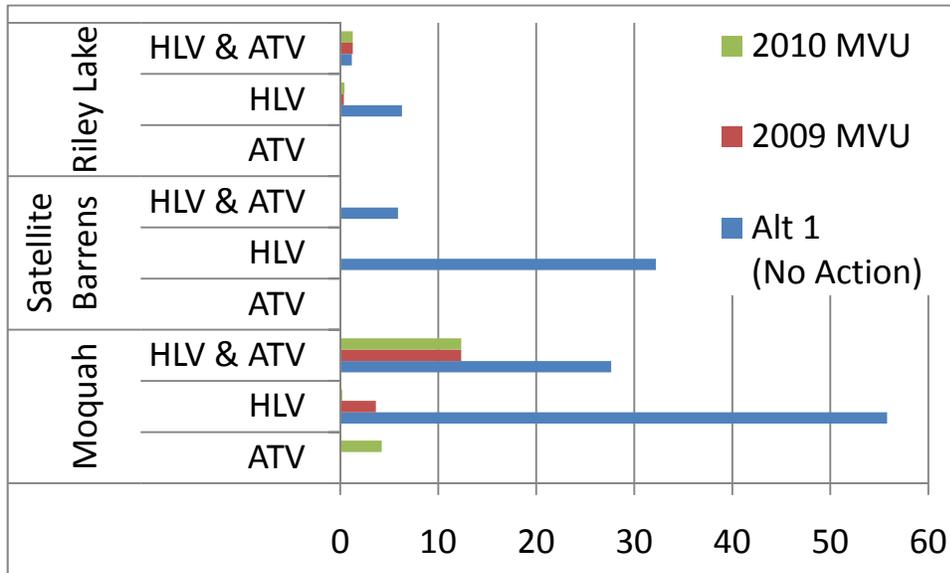


Figure 2. Length (miles) of motorized opportunity within CNNF Management Areas that emphasize open lands conditions (including barrens).

Environmental Consequences - Plants

There were 50 occurrences of RFSS plant species in the vicinity (within ½ mile) of 27 road segments evaluated for designation of a motorized use under this project. The **Determinations** for RFSS plant species in the Biological Evaluation for the 2009 MVUM remain **unchanged** from those given in the April 2008 report (PR # 5402). Effects to species with occurrences near roads that have a proposed change in designated motorized use under the 2010 MVUM are discussed below.

Botrychium mormo

Eight occurrences of *Botrychium mormo* are in the vicinity of four road segments. All of the road segments are proposed to go from having no designated motorized use (under the 2009 MVUM) to allowing Highway Legal Vehicles under the 2010 MVUM. Prior to the 2009 MVUM, these four road segments (totaling 2.11 miles) were open to motorized travel. Although the road system displayed in the proposed 2010 MVUM update would have represent more roads open to motorized travel (and all the risks associated with such roads), the 2010 MVUM road system would be less impactful to the species than the road system that existed prior to the 2009 MVUM. No change in the Determination of Effects is warranted.

Botrychium oneidense

One *Botrychium oneidense* occurrence is within ½ mile of a road segment proposed for a change in the designated motorized use under the 2010 MVUM update. The change would be from allowing highway-legal vehicle to no motorized use at all. Such a change would lessen the risk the road poses to the occurrence. No change in the Determination of Effects is warranted.

Calypso bulbosa

One *Calypso bulbosa* occurrence is within ½ mile of a road that is currently open to seasonal motorized travel (HLV-only) and will remain open to seasonal motorized use but with the addition of ATV access. The species occurs in lowland habitat where motorized travel is not allowed; this road avoids that lowland and would not have an effect on the species. No change in the Determination of Effects is warranted.

Carex craweii

One *Carex craweii* occurrence is within ½ mile of a road that is currently not open to motorized travel but would become available to motorized use (HLV only) under the 2010 MVUM. The species occurs in lowland habitat where motorized travel is not allowed; this road avoids that lowland and would not have an effect on the species. No change in the Determination of Effects is warranted.

Carex synchnocephala

One *Carex synchnocephala* occurrence is known from non-Forest Service lands in the vicinity of a road proposed for an increase in the allowable motorized use (HLV → HLV+ATV) under the 2010 MVUM update. The species is a shoreline specialist where motorized travel is not allowed; this road avoids this shoreline habitat and, assuming users stay on the road, would not have an effect on the species. No change in the Determination of Effects is warranted.

Cynoglossum boreale

Five *Cynoglossum boreale* occurrences are within ½ mile of road segments proposed for a change in the designated motorized use under the 2010 MVUM update. Three of the road segments totaling (1.52 miles of road) are proposed for a removal of motorized use under the 2010 MVUM. Another road (0.16 miles) currently allows both highway legal vehicles and ATVs but would allow only HLV use under the 2010 MVUM. The fifth road segment is 0.41 miles long and would allow HLV-use on a road that currently does not allow motorized use. Overall, the 2010 MVUM would reduce the amount of roads open to motorized use in the vicinity of this species' occurrences on the CNNF. No change in the Determination of Effects is warranted.

Juglans cinerea

Three butternut occurrences are known in the vicinity of roads on which allowable motorized use will be increased from no use to HLV use or from HLV use to HLV + ATV use. Such road use is not expected to impact the spread of the fungal pathogen that is the leading factor in limiting the viability of the species throughout its range. No change in the Determination of Effects is warranted.

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Panax quinquefolius

Eighteen occurrences of American Ginseng are in the vicinity of roads considered for increasing the allowable motorized use (Table 2). Prior to the 2009 MVUM, these road were open to motorized travel and, consequently, would be reverting back to their pre-TMR condition with the exception of seasonal restrictions on several of them. Although the road system displayed in the proposed 2010 MVUM update would have represent more roads open to motorized travel (and all the risks associated with such roads), the 2010 MVUM road system would be less impactful to the species than the road system that existed prior to the 2009 MVUM. Ginseng populations are vulnerable to poaching and the risk of this activity is positively related to road access. For this reason, the road system portrayed by the 2010 MVUM does less to conserve ginseng populations than does the 2009 MVUM road network. Despite the lessening of road restrictions near these ginseng sites, the 2010 MVUM still does not warrant a change in the Determination of effect..

Table 2. Number of Ginseng occurrences, sorted by Risk Ranking, in the vicinity of roads considered for motorized designations under the 2010 MVUM update that differ from that which is displayed on 2009 MVUM.

2009 MVUM Designation	HLV		HLV seasonal	HLV+ATV	NONE
2010 MVUM Designation	HLV+ATV	HLV+ATV seasonal	HLV+ATV seasonal	HLV+ATV fall	HLV
RAP Risk Rating	1	1	2	1	13
1			1		2
3			1	1	6
5	1	1			5
Grand Total	1	1	2	1	13

Piptatherum canadensis

One road segment totaling 0.79 miles of road on the ERFL district that is currently unavailable to motorized use would be made available to highway legal vehicles under the 2010 MVUM proposal. Two occurrences of this species are within ½ mile of the segment and one occurrence is within ¼ mile of the road segment. These occurrences are in openings that are not adjacent to the road segment of concern therefore impacts of use of this road segment are unlikely to have an effect on these *Piptatherum* occurrences or the conditions within the openings they occupy. No change in the Determination of Effects is warranted.

Vaccinium caespitosum and Lycaeides idas nabokovi

Northern Blue Butterfly and its larval host plant, Dwarf bilberry, are known from a scattering of occurrences within an area of approximately 15 km² on the Lakewood Ranger District. Both are Regional Forester Sensitive Species. Most of the occurrences of both species are known from openings adjacent to roads or in proximity to roads (within 500 ft). Northern Blues are obligate herbivores of Dwarf bilberry; therefore, impacts to these two species are assessed together. Approximately 12 road segments are proposed for increasing the allowable motorized use on roads in the vicinity of occurrences of these two species on the CNNF.

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Dwarf bilberry is a low-growing plant and is vulnerable to displacement (by non-native species) from the open habitats it prefers. Fortunately for the species, however, no weed infestations are known from these areas. Northern Blues may puddle along open roads and such behavior puts them at risk of being crushed by vehicles. This risk under the proposed 2010 MVUM update relative to the 2009 MVUM would be elevated because the open road density within the area occupied by bilberry and northern blues is increased. Still, the amount of open roads within this area of the LKLN District would be reduced when compared to the road network that existed prior to the 2009 MVUM. Reduced motorized travel on these roads would be expected to reduce the likelihood of spread of weeds that could impact the host plant, and would reduce the likelihood of traffic-related mortality of butterflies. No change in the Determination of Effects is warranted.

Environmental Consequences - Elk

Little to no change in the 2009 MVUM in the area of concern for elk calving were made therefore the effects analysis related to elk remain unchanged by the 2010 MVUM update proposal. Within Zone A of the Calm Lake Elk range (see Forest Plan Appendix L), under the 2009 MVUM, there were 197 miles of road available to motorized use. Under the proposed 2010 MVUM update, the amount of motorized opportunity is reduced to 186 miles and some of those roads are available in the fall only to avoid disturbing elk during the calving season (Table 3).

Table 3. Miles of open roads and ATV trail available for motorized use within the core area (Zone A) of the Clam Lake Elk Herd on the Great Divide Ranger District of the CNNF.

<i>Motor Vehicle Use</i>	<i>2009 MVU</i>	<i>2010 MVU</i>
ATV	0.00	0.50
HLV	62.19	48.65
HLV, ATV	126.72	128.20
HLV, ATV FALL ACCESS	0.00	0.67
HLV, ATV SEASONAL ACCESS	3.69	3.69
HLV, FALL ACCESS	1.41	1.08
HLV, SEASONAL ACCESS	2.91	3.42
Grand Total	196.92	186.21

Environmental Consequences – Hunting Opportunity

The proposed 2010 MVUM would have a net effect of increasing the mileage of roads open to motorized public use therefore hunting opportunities dependant on motorized access would be expanded under the 2010 MVUM relative to the 2009 MVUM. Motorized hunting opportunity under the 2010 MVUM would remain less than what was available prior to the 2009 MVUM (analyzed as Alternative 1 in the 2008 EA).

Environmental Consequences – Ecological Reference Areas

Excluding map errors and road decisions made in conjunction with vegetation management projects, the 2010 MVUM contains approximately 9 miles of road within Management Areas 8E, 8F and 8G with changes in the allowable motorized use. These areas, collectively are considered Ecological Reference Areas during the development of the 2004 Forest Plan (see Forest Plan EIS pp. 3-110 to 3-126). These areas were designated as such because they provide “benchmark conditions for baseline monitoring and research, refugia for rare species, and some ecological conditions or functions that are not otherwise available across the landscape” (FEIS p. 3-110). Increasing the motorized access within these areas runs counter to these values. Overall, approximately 1 mile of roads within Ecological Reference Areas that were available for motorized use under the 2009 MVUM were made unavailable for motorized use under the 2010 MVUM proposal (Table 4). Conversely, approximately 5 miles of road within these areas that did not allow motorized access, now would allow some form of motorized access under the 2010 MVUM proposal. This is a net increase of approximately 4 miles of roads within MA 8E, 8F and 8G. These roads were all available to some form of motorized use prior to the 2009 MVUM so, in that regard, the 2010 has regressed, however incrementally, toward the conditions of Alternative 1 of the 2008 E.A.

Table 4. Miles of road within Management Areas 8E, 8F or 8G with changes in their designation between the 2009 MVUM and the proposed 2010 MVUM. These changes are divided by the categories of change.

MANAGEMENT AREA – 2009 MVUM DESIGNATION	2010 MVUM proposal							Grand Total
	ATV	HLV	HLV, ATV	HLV, ATV FALL ACCESS	HLV, ATV SEASONAL ACCESS	HLV, FALL ACCESS	NONE	
8E - TOTAL		0.05	0.22					0.27
8E - NONE		0.05	0.22					0.27
8F - TOTAL		2.65	0.00			1.42		4.07
8F - HLV			0.00			1.42		1.42
8F - NONE		2.65						2.65
8G - TOTAL		1.94	1.30	0.12	0.26		0.95	4.57
8G - HLV			0.01				0.91	0.93
8G - HLV, ATV		1.29		0.10			0.03	1.42
8G - HLV, SEASONAL ACCESS					0.26			0.26
8G - NONE		0.65	1.29	0.02				1.96
Grand Total	0	4.64	1.52	0.12	0.26	1.42	0.95	8.91

Motorized Use of Roads not on the MVUM (for Dispersed Camping)

It is estimated that each Ranger District of the CNNF has between 60 and 200 established dispersed campsites:

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- Lakewood Laona – Approximately 100 dispersed campsites within 150' of a road on the 2009 MVUM.
- Eagle River Florence – 125 to 150 dispersed campsites. Approximately 75% are within 100' of a road on the 2009 MVUM.
- Medford Park Falls – 165 dispersed campsites. Approximately 90% are within 100' of a road on the 2009 MVUM.
- Great Divide – 60 to 100 dispersed campsites within 100' of a road on the 2009 MVUM.
- Washburn – Year round use – 8 campsites over 100' from of a road on the 2009 MVUM; 7 campsites within 100' of a road on the 2009 MVUM; Hunting use – more than 100 campsites under 100' from a road on the 2009 MVUM.

Rather than propose that these camping roads/sites be included on the 2010 MVUM, a proposal to allow motorized travel on the first 150' of roads not on the MVUM (provided that they originate from a road where motorized travel is allowed) was put forth. In this proposal, the first approximately 150' of 3,271 roads [from an open road] would become available for dispersed motorized camping (up to 30' off the roadbed). Of the 3,271 roads, there are 231 roads (7%) that present some risk to RFSS.

Allowing motorized travel for the purpose of dispersed camping adjacent to the roadbed that otherwise do not allow motorized travel presents a potential adverse effects to some Regional Forester Sensitive Species (both plants and animals). There are 213 RFSS occurrences within 660 feet of these road segments that would become available for dispersed camping (see Table 4). These RFSS occurrences are in the high risk (rating = 5) category for being impacted by motorized use of the road or dispersed camping adjacent to it. The rating is based on potential effects that could occur such as nest abandonment or altered behavior because of noise, introduction of weed competitors, poaching, etc. These risks are further exacerbated if these road segments are allowed *en masse* to become campsites. An additional 280 RFSS occurrences fall into the category of 'moderate risk' because they are at a greater distance from the roads. The remaining 308 occurrences have a risk rating of '1' because they are within ½ mile of a road considered under the proposal.

Overall, the majority of the animal RFSS put at risk by dispersed camping off of non-MVUM roads are **Northern Goshawk** and **Red-shouldered Hawk** nest locations. Adverse impacts could be avoided by allowing this motorized recreation to occur in late-summer and fall after the nest is no longer a center of activity for these birds. Over 700 RFSS plant occurrences (36 different plant species) could be placed at risk by the dispersed motorized camping proposal; 313 of the occurrences are ginseng. A primary threat to **Ginseng** conservation is poaching (public harvest from CNNF land is not allowed) which may be more likely if camping in the vicinity of its occurrences is authorized under the 2010 MVUM update.

Dispersed motorized camping in clearings adjacent to roads not on the MVUM but originating from open roads (on the MVUM or not) where **Dwarf Bilberry** and **Northern Blue** butterflies are know would be expected to have an adverse impact on populations of these species; they occupy these clearings and frost pockets. Dispersed motorized camping has not been an observed use of these areas, however, because they are not necessarily flat terrain or are

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otherwise undesirable for camping (Steve Janke *pers. comm.* 2010-MAR-11); this risk is probably minimal.

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Table 4. Summary of RFSS occurrences at risk of impact by dispersed camping on roads not on the MVUM.

RFSS	RAP Risk Rating: 1	RAP Risk Rating: 3	RAP Risk Rating: 5	Occurrences at Risk
Animals	43	19	19	81
Black-backed Woodpecker			1	1
Connecticut Warbler		1		1
Gray Wolf			1	1
Northern Goshawk	23	14	13	50
Red-shouldered Hawk	19	3	3	25
Sharp-tailed Grouse	1	1	1	3
Plants (USDA plant codes)	265	261	194	720
AMRO	1			1
ARMI5		1	1	2
BOMI		2		2
BOMO2	34	18	9	61
BOON	7	20	20	47
BORU	1	2		3
CAAS2	13	17		30
CABU	8	5	2	15
CACR3	1			1
CAGY2	3			3
CALI	1		1	2
CAMI15		4		4
CAVA2	1		4	5
CYAR5	2			2
CYBO	45	26	5	76
DIPY	1			1
DREX2	1			1
DRFRR	2			2
ELOL			1	1
EPST		1		1
EQPA		1		1
HUSE	1	1		2
JUCI	8	7	2	17
JUST			2	2
MABR5	6	2	3	11
ORCA5	3		1	4
OXCAC		1		1
PAQU	81	112	120	313
POBR4	12	5		17
RAGM	1			1

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RHFU			1	1
SPGL		1		1
STAM2	2			2
TACA7	27	25	21	73
VACE		10		10
VAUL2	3		1	4
Grand Total	308	280	213	801

Conclusion

Modifications to the 2009 MVUM have an overall consequence of increasing motorized opportunity, for both Highway-legal vehicles and All - terrain vehicles, when compared to the road network displayed on the 2009 MVUM. The combined effect of these modifications to the 2009 MVUM results in a road system that is still substantially less than what was available prior to the 2009 MVUM (considered as Alt 1 in the 2008 E.A.). In total, the road network portrayed by the 2010 MVUM update would be less impactful on Regional Forester Sensitive Species than the road network existing on the CNNF prior to the publication of the 2009 MVUM. Incremental increases in motorized opportunity as we are beginning to see in this first annual MVUM update may lead to incremental increases in effects to Regional Forester Sensitive Species in the future. Still, the 2010 MVUM proposal (excluding the proposed dispersed motorized camping policy) represents an improved environmental outcome to RFSS than the road network that existed on the CNNF prior to the release of the Travel Management Rule.

Relative to the 2009 MVUM road system, the 2010 MVUM road system would allow motorized use on slightly more roads that pose risk to RFSS occurrences but the risk of impacting RFSS would be mitigated by allowing seasonal use (fall) on some roads to avoid breeding season (in the case of forest raptors). For other species, such as American Ginseng, the increases of the amount of open roads near their occurrences and, accordingly, increases in the *likelihood* of impact is, without exception, more similar to that of the 2009 MVUM than Alt 1 of the 2008 EA.

Unique to the 2010 MVUM update proposal, allowing motorized travel on the first approximately 150 feet of any road not physically closed poses an unquantified risk to regional forester sensitive species known from the immediate vicinity of these road segments. This risk is unquantified because the actual locations where dispersed motorized camping would occur is only be a subset of the total opportunity afforded in this proposal. And only a subset (7%) of the road segments analyzed for environmental effects have RFSS resource concerns. Unfortunately, it remains unknown whether the campsites that would be used are part of that 7%.

Modifications to the 2009 MVUM as proposed for the 2010 MVUM do not meaningfully change the outcomes of the analysis for the Clam Lake Elk Herd or Hunting Opportunity.

This project complies with Forest Plan and Regulatory direction for sensitive plant and animal species. Implementation of any of them would not result in loss of viability of any Federally-listed species or agency-identified sensitive species (Regional Forester Sensitive Species) and is therefore consistent with the Endangered Species Act, the National Forest Management Act and Forest Service Manual Direction (section 2672).

Addendum

Following the analysis provided on pp 5-7 for dispersed motorized camping, roads falling within MA 5, 5B, 6A, 6B and XX.0 areas were determined to be outside of the scope of allowing public motorized use within these areas. This resulted in the elimination of 59 (of the initial 3,271) roads from the analysis of effects to Regional Forester Sensitive Species. I have not reviewed the RFSS occurrences (if any) in the vicinity of these 59 road segment but because they represent less than 2% of the road segments in the initial analysis, I am confident that their exclusion does not meaningfully impact the specific conclusions regarding the environmental consequences of this aspect of the proposal (pages 9-11 of this document).