

Environmental Assessment

Commander Tract Motorized Access

USDA Forest Service, Pacific Southwest Region
Grindstone Ranger District, Mendocino National Forest
Glenn County, California

Chapter 1 - Purpose and Need/Proposed Action

Introduction

This document analyzes a travel management proposal to provide public motorized access to a portion of the lands acquired by the Forest Service in 2003 from private ownership. These lands are popularly known as the Commander Tract. This proposal would provide access into Commander Tract lands in the upper Cold Creek watershed (hereafter 'project area').

This proposal is one of eight travel management proposals that were developed at public workshops during 2006 (refer to Public Involvement section below). The proposals are being made pursuant to recent changes in travel management and other regulations [36 CFR Parts 212, 261, and 295¹]. The changes require all national forests to restrict motorized use to designated roads, trails, or areas.

For national forests, such as MNF, that have already restricted motorized use to such designated route systems, the regulations allow two options: a) provide public notice that the existing designated system will remain unchanged; or b) work with the public to make needed changes to the existing system. During 2006, Mendocino National Forest worked with stakeholders to examine whether there were affordable improvements that could be made to the existing motorized route system. This proposal is a product that process.

Proposed Action

Under the proposed action about 15 miles of road would be opened to public motorized vehicle use in the project area (refer to vicinity map, pg 2). These roads are currently managed for administrative use only. Under the proposed action we would manage the roads for wheeled, motorized use by the public. This change would improve motorized access into this area for the public.

¹ Refer to Federal Register / Vol. 70, No. 216 / Wednesday, November 9, 2005 / Rules and Regulations / pp. 68287 – 68291.

INSERT VICINITY MAP

In response to the significant issue that was raised during scoping, we developed Alternative 3. It would open about 14.5 miles of road, and also includes some road decommissioning and elimination of user-created routes. At this time, the responsible official prefers Alternative 3 over the proposed action for which we conducted public scoping. Detailed descriptions of the proposed action and Alternative 3 are provided beginning on page 8.

Two of the seven other travel management proposals are being concurrently analysed in other environmental documents as separate proposed actions². The other five proposals³ were decided upon in late November and early December 2007. We are considering each of these proposals separately, on its own merits, because none of them depend on any of the others for its justification. However, we will consider any overlapping environmental effects to assure that no cumulatively significant effects are overlooked. In this case, the only overlap is a single dispersed camp access route⁴ that is located within one of the subwatersheds affected by this proposal.

Purpose and Need

There is a need for motorized access to Commander Tract lands within upper Cold Creek watershed.

The roads in the Commander Tract existed prior to the land acquisition. Most of the roads were managed by the previous owner for administrative motorized vehicle use only (not for public use). The Forest Service retained the pre-existing road management objectives and restrictions until we could determine which of the roads were appropriate and affordable to open to public use.

The need for motorized access in the project area is comparable to other areas of the Mendocino NF with similar multiple use management objectives. The Forest Plan established the project area's Recreation Opportunity Spectrum (ROS) classification as "roaded natural". The desired remoteness criterion for *roaded natural* areas is that they be within ½ mile of a road that is open to the public. Currently, about 2,440 acres of the project area are further than ½ mile from open roads⁵.

The project area was selected because early discussions with the public indicated a higher degree of demand for access in this area as compared to other areas of the Commander Tract. The extent of unauthorized vehicle

² *Upper Deer Valley Road OHV Riding Connectivity and Hull Mt. to Bald Mt OHV Hunting Connectivity.*

³ *Ivory Mill Saddle to Snow Mt OHV Hunting Connectivity, Wolf-Trough-Letts OHV Riding Connectivity, Long Ridge OHV Corridor Connector, Motorized Access for Dispersed Camping, and Close OHV Trail 68.*

⁴ NE587, in Sec 23 T21N R9W MDBM. Its effects are pertinent to the hydrologic and aquatic resource analyses, which take it into account.

⁵ *Road Needs Assessment – Commander Tract Roads*, 12 May 2008

use⁶ can be viewed as an indication of strong demand for motorized recreation access.

This proposal would respond to this demand and achieve recreation-related desired conditions established by the Forest Plan. It would do so by opening roads into the areas that are currently further than ½ mile from an existing open road. This proposal implements the following Forest Plan direction:

- It contributes to the following Forest Goal:
 - Recreation – Provide a full range of developed and dispersed recreation opportunities at levels meeting projected demand and within the physical limits and resource capabilities of the Forest. [Forest Plan, p. IV- 3; see also the ROS map and Appendix F]

We have evaluated the roads in the Cold Creek watershed to determine which can be managed to provide low impact motorized access to the area for hunting and other recreation activities. The roads that are being considered for opening under this proposal have been identified as well-located and designed for relative ease (affordability) of maintenance for low resource impacts.

There is a need to conform to the travel management rule Subpart B.

The travel management rule establishes criteria⁷ for the designation of roads, trails and areas for wheeled, motorized vehicle use. Those criteria apply to travel management proposals such as this one.

Several local decision criteria have also been established for travel management decisions under the motorized route designation process on MNF (refer to Appendix D for details). Any proposal should be responsive to these decision criteria. We developed the criteria in collaboration with interested stakeholders, and the Forest Supervisor and District Rangers approved them. Although these MNF criteria were developed prior to issuance of the travel management rule, they correspond roughly with the general criteria⁸ in the rule.

Decision Framework

The proposed action would be within the authority of the Grindstone District Ranger, who will therefore be the Responsible Official for this decision. The scope of the decision will be limited to whether to implement the proposed action or another alternative that meets the purpose and need, or to take no action at this time.

⁶ In spite of the roads being closed to public motorized use, extensive unauthorized use has occurred on many of them since the land was acquired. Unauthorized use occurs mostly just before, and during hunting seasons, and occurs at a low level at other times.

⁷ 36 CFR §212.55 – excerpt of text is provided in Appendix C

⁸ 36 CFR §212.55(a)

In making his decision, the District Ranger will consider the environmental effects of each alternative, and also how well each alternative achieves the purpose and need for action.

Public Involvement and Issue Identification

Public Involvement

On August 11, 2003, the Pacific Southwest Region of the Forest Service entered into a Memorandum of Intent (MOI) with the California Off-Highway Motor Vehicle Recreation Commission, and the Off-Highway Motor Vehicle Recreation Division of the California Department of Parks and Recreation. That MOI set in motion a region-wide effort to “Designate OHV roads, trails, and any specifically defined open areas for motorized vehicles on maps of the 19 National Forests in California by 2007.” In July 2004 the Forest Service Chief announced the Forest Service decision to develop a strategy for OHV management (this was the initiation of the rulemaking process for the Travel Management Rule). The MNF sent copies of the news releases regarding these two announcements to local media, congressional staffers and county officials.

The MNF team developed a strategic public involvement plan. To announce the beginning of the route designation process and provide information about upcoming public meetings, they sent a target-audience letter, issued news releases and did an Internet web posting. Three public meetings were held in March and April 2005, in Willows, Ukiah, and Red Bluff.

During the remainder of 2005, public involvement centered on validating our route inventory. The public was asked to provide information regarding motorized routes that may have been missed by the inventory.

In 2006 we turned to the task of developing a proposed action in collaboration with the interested public. We asked for a few volunteers to help us determine how best to include people that would be interested or affected by possible changes in the MNF road and motorized trail systems.

Two rounds of public workshops were held during the proposed action development process – one in late February and March, and one in mid-June. Each round had one workshop each in Willows and Ukiah. The workshops were announced in advance through news releases, mailings, and web posting. Workshop materials were also posted on the web for those who could not attend.

Their input, along with that which we received by mail or personal contact, was used to identify needs and possible actions for improving the existing Mendocino NF motorized route system. Those were presented at a third round of public workshops, in November, prior to finalizing a set of proposed actions for scoping. The main objective of these workshops was to get stakeholder input regarding a set of proposals that we had identified as tentative proposed actions that were ripe for decision at this time.

This proposal generated no concerns at either the Ukiah or the Willows workshop. Therefore, the original proposal, as scoped, is the same as the tentative November 2006 proposal.

Scoping letters, including project description and maps, were sent out via regular mail (97 addressees), email (115 addressees), and to the listserve FS-ROUTE-DESIGNATION@newsbox.usda.gov. The list of addressees was compiled from public workshop sign-up sheets, and other expressions of interest received since the route designation process began in late 2004. The same scoping materials were posted to the MNF web page. Notice was published in Ukiah Daily Journal. All scoping materials requested that comments be submitted by 3 Aug 2007.

Six groups submitted scoping comments. In all, two distinct comments were identified, both of which raised issues⁹:

Significant Issues

One significant issue was identified¹⁰. Alternative 3 was developed to address this issue.

- **Road-related sediment could impact threatened fish species** – The comment requested that the environmental analysis disclose impacts to federally listed threatened or endangered species, or Forest Service sensitive species. The comment was expressed as a general concern; no specific species, impacts or impact mechanisms were identified in the comment. Our preliminary analysis indicated that the only species in these categories that would be potentially affected would be 3 threatened anadromous fish species¹¹. The closest habitat is about 6 miles downstream in lower Cold Creek. The potential mechanism for impact on the fish or their habitat would be erosion and downstream transport of sediment from the proposal area to lower Cold Creek and Black Butte River. Sediment production is related to cumulative watershed disturbance, and roads contribute to watershed disturbance, so we selected the following indicator to estimate effects of the alternatives.
 - **Indicator: Cumulative watershed disturbance** – The effects related to this issue will be estimated in terms cumulative watershed disturbance, as measured by equivalent roaded acres (ERA), and expressed as a percentage of each affected subwatershed's threshold of concern.

⁹ A comment raises an issue if it concerns a point of disagreement, debate or dispute about the environmental effects of the proposed action

¹⁰ *Scoping Summary and Issue Identification* document,

¹¹ Coho salmon (Southern Oregon/Northern California Coasts ESU) (*Oncorhynchus kisutch*); Chinook salmon (California Coastal ESU) (*Oncorhynchus tshawytscha*); Steelhead (Northern California ESU) (*Oncorhynchus mykiss*).

Non-Significant Issues

One comment requested that the environmental analysis disclose impacts to non-motorized recreation, but was expressed as a general concern. No specific impacts on established or planned types of non-motorized recreation were identified in the comment.

The IDT polled FS employees familiar with the area, and none knew of any established or planned types of non-motorized recreation that would be impacted by the proposal. The Forest Plan established a “roaded natural” Recreation Opportunity Spectrum classification for the area. Provision of motorized access is consistent with the types of recreation opportunities provided by roaded natural areas¹².

Pre-Decision Review & Comment Period

Notice of opportunity to comment, pursuant to 36 CFR Part 215, was published in Grindstone Ranger District’s newspaper of record, Chico Enterprise Record, on 7 July 2008. The notice, draft EA and FONSI, final Appendices C & D, and draft Appendix L were sent to those that either provided scoping comments or specifically requested the draft documents. A copy of the notice was sent to those who had expressed any general interest in the route designation process, and to listserve FS-ROUTE-DESIGNATION@newsbox.usda.gov. The draft documents were also posted to the MNF route designation web page. News releases were issued to local and regional newspapers, radio, and television stations.

Two individuals provided comments. Neither of these had provided scoping comments. No comments were received from any of the individuals that raised the significant issue during scoping. Both of the commenters expressed opposition to the decommissioning of roads and closure/rehabilitation of user-created routes.

Details regarding notification and consideration of comments are documented in Appendix Z.

Chapter 2 - Alternatives, Including the Proposed Action

Alternatives not Considered in Detail

We considered opening all of the inherited roads to public access. However, that would not be affordable within our projected road maintenance funding. Neither would it be necessary in order to meet the purpose and need.

¹² MNF Land and Resource Management Plan, ROS Map & Appendix F, 1995

We also initially considered opening two roads in addition to those included in the proposed action: 21N06 between its junctions with 21N07 and FH7 (in the vicinity of Squaw Camp); and 21N215 between its junctions with 21N216 and FH7 (in the vicinity of Cottonwood Glade). These were dropped from detailed consideration due to conflicts with heritage resources, and because they were not essential to meet the purpose and need¹³.

Alternatives Considered in Detail

We considered three alternatives in detail:

- Alternative 1 is the original proposed action for which scoping was done. However, the responsible official, District Ranger Olmedo, currently prefers Alternative 3.
- Alternative 2 is the no-action alternative that is required by the regulations to be considered in detail in all cases.
- Alternative 3, the agency-preferred alternative. This alternative responds to the significant issue that was raised during scoping, and also achieves the purpose and need to nearly the same degree as the original proposed action.

Alternative 1 – (Proposed Action) Open 15.0 Miles of Road to Motorized Use

Under this alternative, the Forest Service would open about 15.0 miles of national forest transportation system (NFTS) roads to public motorized vehicle use in the project area [Alternative 1 map, pg 9]. These roads are currently managed for administrative use only (although unauthorized public use is occurring). The roads would be managed for use by highway-legal vehicles and drivers.

Opening these roads would make it necessary for us to physically block access to connecting roads that would remain closed to public motorized use. Though the roads that remain closed would not appear on the Motor Vehicle Use Map (MVUM¹⁴), visitors may stray off of the open roads without closure devices to discourage unauthorized use on the roads that would remain closed. We would use various methods, depending on topography, the expected frequency of necessary administrative traffic, and available funding. Examples of traffic barriers we would use include gates, guard rails, earthen berms, logs, concrete traffic barriers, and tank traps.

Two historic properties are present within the area potentially affected by the proposed action. Site FS 05-08-53-484 and 05-0853-508 are both prehistoric resources. Both sites would be flagged for protection, and would be avoided by project activities.

¹³ *Developing Proposed Action(s) – Motorized Route Designation Process*, 13 November 2006.

¹⁴ Motor Vehicle Use Map – this is the legal instrument for designating routes that are open to public motorized use.

INSERT ALT 1 MAP

INSERT ALT 3 MAP

Alternative 2 – No Action

Under the No Action alternative the roads listed under the proposed action would continue to be managed for administrative motorized vehicle use only. This means that they would remain closed to public motorized vehicle use, and there would be no change in the level of legal motorized access within the project area.

Alternative 3 – (Preferred) Open 14.5 Miles of Road to Motorized Use; Include Mitigation and Restoration Measures

This alternative was developed to respond to the significant issue: *Effects on Threatened Fish Species*. We looked for ways to meet the purpose and need that would result in lower cumulative watershed disturbance over time as compared to the proposed action. This alternative would differ from the proposed action as follows:

- Drops 0.5 mile section of steep, erodable road from the network that would be opened under the proposed action. This would improve the sustainability of the opened road network, by making it more affordable to maintain for resource protection. Total miles that would be opened to public use would be about 14.5 miles.
- Decommissions about 10.1 miles of the inherited road network.
- Blocks access and rehabilitates about 8.8 miles of inventoried user-created motor vehicle routes. These routes are not NFTS roads or trails, and motorized use on them is currently unauthorized.

A map of Alternative 3 is on page 10.

Comparison of Alternatives

Table 1 compares the mileage of each route type under each alternative (only routes that are affected by at least one of the action alternatives are included). Table 2 compares the alternatives in terms of environmental effects and how well they respond to the purpose and need.

Table 1 – Comparison of Mileage by Route Category			
Route Type	Route Mileage		
	Alternative 1	Alternative 2	Alternative 3
Administrative use NFTS roads	10.1	25.1	0.5
NFTS roads open to public (highway legal only)	15.0	0	14.5
NFTS roads decommissioned	0	0	10.1
User-created routes eliminated	0	0	8.8
User-created routes left untreated	8.8	8.8	0

Table 2 – Comparison of Alternatives			
Item	Alternative 1 Proposed Action	Alternative 2 No Action	Alternative 3 Preferred
Provision of Motorized Public Access			
Miles of road opened	15.0	0	14.5
Change in acres w/in ½ mile of open road	+1903	0	+1903
36 CFR §212.55 Criteria for designation of roads, trails, and areas¹⁵.			
(a) General criteria	See MNF decision criteria below.		
(b) Specific trail and area criteria	Not Applicable – the proposed action is a road proposal, and it includes no trail or area elements.		
(c) Specific road criteria	<p>1) Traffic volume would be low, predominantly public w/ occasional administrative use for resource management and protection. Primary public use would be associated with deer hunting.</p> <p>2) These roads are designed for low-speed log haul & other timber management traffic, but</p>	<p>1) Authorized traffic would be predominantly occasional administrative use for resource management and protection.</p> <p>2) These roads are designed for low-speed log haul & other timber management traffic and are suitable for the existing and anticipated administrative uses.</p>	<p>1) Same as Alternative 1.</p> <p>2) Same as Alternative 1.</p>

¹⁵ See Appendix C for full text of §212.55, and other related excerpts.

Table 2 – Comparison of Alternatives			
Item	Alternative 1 Proposed Action	Alternative 2 No Action	Alternative 3 Preferred
	are also suitable for low-speed recreation traffic.		
(d) Rights of access	1) Not Applicable - There are no valid existing rights to affect. 2) Not Applicable – No access to private land inholdings would be affected.		
(e) Wilderness & primitive areas	None of the alternatives would establish a motorized road, trail or area in a wilderness.		
Mendocino National Forest Decision Criteria¹⁶			
1) Operational Affordability	Would increase maintenance workload on about 15.0 miles of road. Average annual costs of custodial level maintenance would be ~\$325/mi higher ¹⁷ , or ~\$4,875 total.	No change in maintenance workload	Would increase maintenance workload on about 14.5 miles of road opened, and decrease on 10.1 miles decommissioned. Average annual costs of custodial level maintenance on opened roads would be ~\$325/mi higher, or ~\$4,715 total; savings on decom roads would be ~\$115/mi, or ~\$1,150. Net average annual increase would be ~\$3,565.
2) Low Capital Investment	About \$33,000 for barriers to block traffic on closed roads that connect to the roads that	None	About \$81,000 total - \$33,000 for barriers to block traffic on closed roads that connect to

¹⁶ Refer to Appendix D.

¹⁷ MNF Forest-scale Roads Analysis Report, January 2003 – Appendix 3.1, Table A3.1-8, pg a3.1- 17.

Table 2 – Comparison of Alternatives			
Item	Alternative 1 Proposed Action	Alternative 2 No Action	Alternative 3 Preferred
	will be opened.		the roads that will be opened, plus \$48,000 for decom of roads and user-created routes.
3) Balanced Recreation Opportunities	Compatible with roaded natural ROS classification established by the Forest Plan. ROS classifications were established as a basis for providing balanced forest-wide recreation opportunities. Meets remoteness criterion better than no-action alternative.	No change	Same as Alternative 1.
4) Quality Motorized Recreation Opportunities	Increases roads open to public by ~15.0 miles configured as 3 loops. Loops are considered to improve the quality of motorized recreation experiences.	No change.	Increases roads open to public by ~14.5 miles configured as 2 loops and one dead-end spur.
5) Compensatory Tradeoffs	Would not alter the net mileage of routes authorized for OHV use.		
6) Cost Efficiency	The roads in this area do not have above- or below-average maintenance costs, so cost efficiency is not a consideration.		
7) Forest Plan Compliance	No amendment required for any of the alternatives. The action alternatives comply with all applicable resource protection standards (details in Appendix L).		

Table 2 – Comparison of Alternatives			
Item	Alternative 1 Proposed Action	Alternative 2 No Action	Alternative 3 Preferred
Environmental effects related to the significant issue – Effects on threatened / endangered fish			
Cumulative Watershed Disturbance - %TOC	Existing – 72% to 22% In 2014 – 48% to 19%		Existing – 72% to 22% In 2014 – 44% to 18%
Environmental effects related to significance factors [40 CFR §1508.27]			
Heritage Resources	Heritage resources would not be affected. The area of potential effects has been surveyed. Ground disturbing activities would avoid all known sites.	Not applicable.	Same as Alternative 1.
Threatened, Endangered, Proposed Species	No listed species, proposed species or critical habitat would be adversely affected		
Other Env. Laws & Requirements	Would comply with NFMA through compliance with Forest Plan management direction, and with requirements for maintaining species viability.	None are applicable to taking no action.	Would comply with NFMA through compliance with Forest Plan management direction, and with requirements for maintaining species viability.

Chapter 3 - Environmental Consequences

Effects Relative to Significant Issues

Only one significant issue was raised.

Effects on Threatened Fish Species

As noted earlier, we are using cumulative watershed disturbance as an indicator of potential impacts to three threatened fish species. This is because roads contribute to cumulative watershed disturbance, which in turn is linked to sedimentation rates that can affect downstream aquatic habitat.

The project area is located within five 8th field¹⁸ watersheds in the upper Cold Creek watershed. The primary sources of existing disturbance in these watersheds are timber harvest and roads. There is also a minor component of user-created motor vehicle routes.

Alternatives 1 and 2 would not result in any change in road mileage/acreage. Alternative 3 would decommission about 10.3 miles of NFS roads and about 11.0 miles of user-created routes.

The decommissioning under Alternative 3 would not result in any immediate difference in disturbance from Alternatives 1 and 2. This is because the disturbance level of decommissioned roads does not go to zero immediately. It decreases over a period of time as vegetation re-grows and provides protection against erosion.

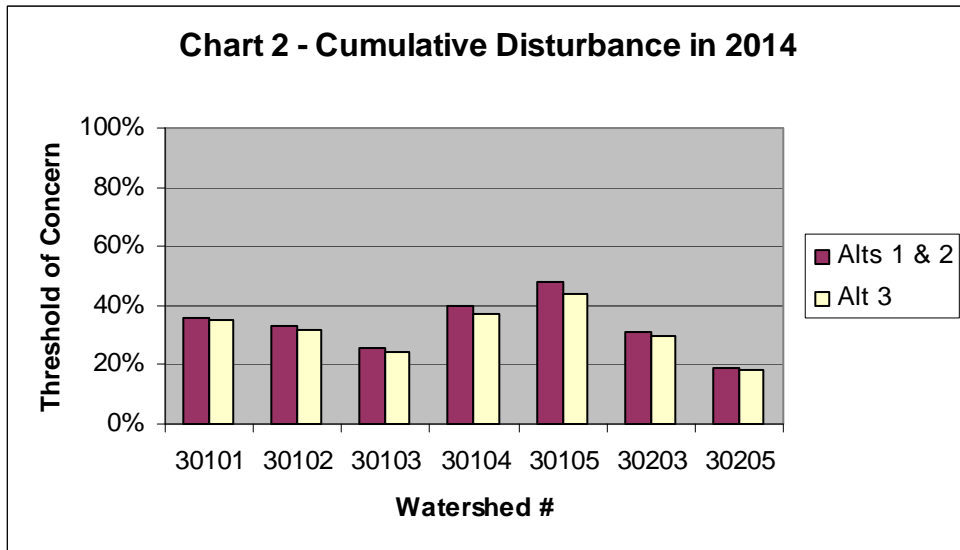
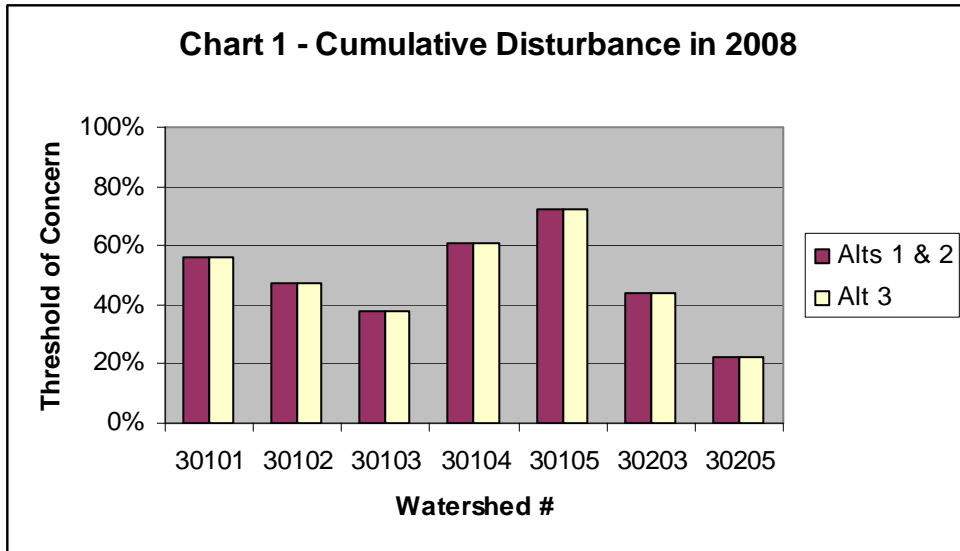
Chart 1 displays the existing cumulative disturbance of the affected watersheds, in terms of the percentage of each watershed's threshold of concern. Note that all of the affected watersheds are well below their thresholds of concern. This indicates low likelihood of significant watershed effects, such as adverse sediment production rates.

Chart 2 displays the projected disturbance levels in 2014, after several years of recovery. You will notice two things:

- There has been substantial reduction in cumulative disturbance levels in all affected watersheds. The lion's share of this improvement is a result of recovery of harvested areas that are re-growing.
- Which is related to the second thing – that there is not a whole lot of difference between Alternative 3 and the other two alternatives. Although the decommissioning under Alternative 3 has resulted in some

¹⁸8th field watersheds are the size we normally use to assess cumulative effects of proposed activities.

additional recovery, it is dwarfed by that which is attributable to recovering harvest areas.



This is not to say that the difference is of little value. In the long run, this will be a relatively permanent reduction of the amount of disturbance allocated to the road network. This provides for more management flexibility, and a wider margin of aquatic resource protection.

Based on this information, and upon field inspections, our team hydrologist determined that none of the alternatives would result in any sediment-related

water quality degradation¹⁹. In turn, our team fish biologist determined that there would be no adverse effects on the three federally listed fish species or their habitat. This was because the only potential for effects was indirectly, through excessive sediment export from the project area, which not occur.

Effects Relative to Significance Factors

The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historical resources

The area of potential effects has been surveyed and the action alternatives have been approved in accordance with stipulations in the *First Amended Regional Programmatic Agreement Among the U.S.D.A. Forest Service, Pacific Southwest Region, California State Historic Preservation Officer, and Advisory Council on Historic Preservation Regarding the Process for Compliance with Section 106 of the National Historic Preservation Act for Undertakings on the National Forests of the Pacific Southwest Region* (2001). Properties identified by surveys would be adequately protected by the avoidance strategy included in the action alternatives.

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973

The biological assessment²⁰ determined that Alternative 3 would have no effect on listed species, proposed species or critical habitat. This determination was based on the factors discussed under *Significant Issues* [pg 6], and *Effects Related to Significant Issues* [pp 16-18]. Because Alternatives 1 & 3 would have no biological effects to add to other existing or foreseeable biological effects, there are no cumulative effects to consider in determining significance.

Whether the action threatens a violation of Federal, State, or local law or other requirements imposed for the protection of the environment

National Forest Management Act (NFMA) – The Mendocino NF Forest Plan established the management direction with which management actions must comply to ensure conformance with the NFMA. The interdisciplinary team identified applicable Forest Plan direction, and evaluated the effects of

¹⁹ *Hydrologic Analysis – Commander Motorized Access*, 23 July 2008.

²⁰ *FOREST-WIDE MINOR PROJECT EFFECT DOCUMENTATION FORM*, 01 October 2008.

Alternatives 1 & 3²¹ regarding compliance with that direction. The team concluded that both are compliant with applicable management direction. Details of the review and conclusions are in Appendix L.

The Forest Service Manual provides additional NFMA management direction, regarding species viability. FSM 2670.32 directs that we avoid or minimize impacts to species whose viability has been identified as a concern. This would include federally listed threatened or endangered species, FS sensitive species, and, for Northwest Forest Plan forests such as the MNF, survey & manage species. Effects on threatened and endangered species and critical habitat are noted under that subsection above. The biological evaluation²² determined that there would be no effect on FS sensitive species, because the action alternatives would not affect suitable habitat. A compliance review for survey & manage species determined that there would be no effect on any of these because the proposal would not affect suitable habitat. Based on this information, the proposal complies with the NFMA's species viability requirement.

Compliance with the Clean Water Act is achieved through compliance with applicable watershed / water quality standards of the Forest Plan, as documented in Appendix L and the hydrology report²³.

National Historic Preservation Act is documented above under the historical / cultural resource subheading [pg 18]. Neither public comments nor agency analysis have identified any other environmental protection requirements that apply to the action alternatives.

Chapter 4 - Agencies and Persons Consulted

Person or Agency	City of Residence or Office Location
US Fish and Wildlife Service	Red Bluff
North Coast Water Quality Control Board	Santa Rosa
Beck, Damon	
Davis, Terry; Sierra Club, Mother Lode Chapter	
Dietz, Matthew; The Wilderness Society	
Hendry, Mike	
Kassar, Chris; Center for Biological Diversity	
Schambach, Karen; Center For Sierra Nevada	

²¹ The no action alternative, by definition, cannot violate Forest Plan direction, because the MNF Forest Plan does not compel any action.

²² FOREST-WIDE MINOR PROJECT EFFECT DOCUMENTATION FORM, 01 October 2008.

²³ Hydrologic Analysis – Commander Motorized Access, 23 July 2008.

Person or Agency	City of Residence or Office Location
Conservation	
Schoradt, Brent; California Wilderness Coalition	
Van Velsor, Stan; The Wilderness Society	

List of Appendices

Designation	Subject Matter
Appendix C	Excerpt from 36 CFR §212
Appendix D	MNF decision criteria
Appendix L	Forest Plan compliance
Appendix Z	Consideration of comments on the proposed action, pursuant to 36 CFR §215.6(b)

Factual Corrections and Substantive Changes between Draft and Final

Page(s)	Change
12	Mileage of user-created routes to be closed and rehabilitated was corrected from 11.0 to 8.8. The draft EA figure erroneously included some routes on private land and some that were added to NFS motorized trail system for dispersed camp access under a separate decision – <i>Motorized Access for Dispersed Camping</i> , November 2007.
12	Added table - <i>Comparison of Mileage by Route Category</i>