

Environmental Assessment

Ivory Mill Saddle to Snow Mt. OHV Hunting Connectivity

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 improve route connectivity for non-highway-legal vehicles and drivers in the area along road M3 between Ivory Mill Saddle and West Crocket Trailhead, near Snow Mountain.

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.

Proposed Action

The Forest Service is proposing to allow mixed use on a segment of M3 from Ivory Mill Saddle to near West Crockett trailhead (see vicinity map, p 2). Mixed-use allows use by both highway-legal and non-highway-legal vehicles and drivers. Currently only highway-legal vehicles are allowed. Total length of the segment is about 17.5 miles.

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

VICINITY MAP

This change would improve connectivity for non-highway-legal vehicles and drivers by making it legal for them to travel on M3 between the several existing mixed-use roads that connect with it in this area. A more detailed description of the proposed action is provided beginning on page 7.

The seven other travel management proposals are being concurrently analysed in other environmental documents as separate proposed actions². 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.

Purpose and Need

During public involvement, hunters expressed a desire to increase connectivity for OHV travel (non-highway-legal vehicles or drivers). More specifically, the need is for improved connectivity between existing, mixed-use roads and/or OHV trails that are currently connected only by roads that are not currently legal for use by OHVs. The area served by this segment of M3 is one of those areas for which increased OHV connectivity is desired by hunters.

Currently, hunters that use OHVs cannot legally use this segment of M3 to drive between the existing mixed-use roads that connect to it. This is because M3 is currently managed to accommodate low-clearance passenger vehicles, which meets the definition of a 'highway' under the California Vehicle Code (CVC). The California Vehicle Code prohibits non-highway-legal vehicles and drivers from using roads that meet the definition of a highway.

This situation imposes the inconvenience of having to transport their OHVs between the mixed-use roads with a highway-legal vehicle in order to comply with traffic law. Our proposal would eventually lead to authorizing OHV use on this segment of M3. This in turn would improve connectivity and rider convenience within and between popular deer hunting areas in this vicinity.

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.
- It contributes to the following Desired Condition:
 - Recreation – ...Off-highway-vehicle use will be on designated routes with the major concentration of use in the southern portions of the Forest... [Forest Plan, p. IV- 6]

² Hull Mt to Bald Mt OHV Hunting Connectivity, Wolf-Trough-Letts OHV Riding Connectivity, Upper Deer Valley OHV Riding Connectivity, Long Ridge OHV Corridor Connector, Motorized Access for Dispersed Camping, Close OHV Trail 68, and Commander Tract Motorized Access.

In addition to meeting the need for connectivity, the travel management rule establishes criteria³ 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 criteria⁴ in the rule.

Decision Framework

The responsibility for establishing and revising road management objectives is delegated to the District Ranger level [FSM 7710.44]. 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.

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

In July 2004 the Forest Service Chief announced the Forest Service decision to develop a strategy for OHV management (designated trails and route system). Concurrently, FS Pacific Southwest Region (Region 5) announced a Memorandum of Intent with the State of California OHV Commission to work together to implement the national direction and conduct trail inventories on all Region 5 national forests. 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.

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

⁴ 36 CFR §212.55(a)

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 motorized route designation.

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, this 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.

Two individuals and six groups submitted scoping comments. In all, two distinct comments were identified, neither of which raised an issue⁵:

- One comment suggested that road M3 from M10 intersection north to intersection of UL018 (aka USFS jeep trail number 8W18) needed to be added to the list for 'dual use designation' [mixed use] for OHV trail connectivity purposes. This is a segment of M3 that runs southwest from the segment being considered in this proposal. The suggested segment is already managed for mixed use.
- The other comment was a statement of non-opposition to this or the other four OHV connectivity proposals.

⁵ A comment raises an issue if it concerns a point of disagreement, debate or dispute about the environmental effects of the proposed action

Significant Issues

No issues, significant or non-significant, were identified.

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 11 October 2007. The notice, draft environmental assessment, draft finding of no significant impact, and appendices C, D, and L were sent to those who provided scoping comments, and to others who requested them. Copies of the notice were sent to those who expressed general interest in route designation during the planning process.

Two supportive comments were received. Details regarding notification and responses are documented in Appendix Z.

Chapter 2 - Alternatives, Including the Proposed Action

Because no significant issues have been raised, no alternatives to the proposed action have been developed for either detailed or cursory consideration subsequent to scoping. Therefore only the proposed action and the no-action alternatives are discussed in detail.

Alternatives not Considered in Detail

However, during the proposed action development process, two other options were considered for meeting the connectivity need along M3. One option included the segment from Ivory Mill Saddle north to the junction with M6. The Forest Leadership Team selected the proposed action for advancement over this option because that segment is still needed for timber management purposes. This option was not analysed in detail, because it does not respond to any significant issues; detailed analysis would not serve to *sharply define the issues and provide for a clear basis of choice among options*⁶

The other option was to immediately rough-up the running surface and implement other necessary safety mitigation measures so that mixed-use could be allowed sooner. The Forest Leadership Team did not select this option as the proposed action because of the lack of available funding to pay for such a substantial capital outlay. This option was not analysed in detail, because its effects would be essentially the same as those of the proposed action, except for the timing and level of capital investment.

⁶ Paraphrased from NEPA regulations at 40 CFR §1502.14.

Alternatives Considered in Detail

Alternative 1 – (Proposed Action) Manage M3 for Mixed Use Between Ivory Mill Saddle and Snow Mountain

The proposed action would change the vehicle class allowed on a segment of M3 between Ivory Mill Saddle and near the West Crockett Trailhead from “highway legal only” to mixed use (both highway legal and non-highway-legal vehicles allowed). This road segment is 17.5 miles in length (see proposal map, pg. 9). Currently, this road segment meets the definition of a ‘highway’ under the California Vehicle Code (CVC). The California Vehicle Code prohibits non-highway-legal vehicles and drivers from using roads that meet the definition of a highway. Changing the vehicle class on this road segment, as proposed, would require a change in road conditions such that the road would no longer meet the CVC highway definition.

Since the road currently meets the CVC highway definition, mixed-use would not be allowed until the road condition has degraded (due to altered maintenance practices, road wear, wet weather, etc.) to a condition suitable for high clearance vehicles. Based on observations of road wear and maintenance needs on similar roads and soil types, it is estimated that with altered maintenance practices, this road segment will become suitable for high clearance vehicles in about 3-4 years. At that time, the road will be designated for mixed use on the Forest Motor Vehicle Use Map and the road will be signed accordingly. Prior to designation, a qualified road engineer will assess the actual road condition and determine that high-clearance vehicle conditions have developed sufficiently to allow mixed use.

Table 1 describes the characteristics of high clearance vehicle roads versus low clearance roads. The characteristics of high clearance roads will need to develop before the mixed use will be allowed on M3 road segment.

Table 1 – Comparison of Road Types		
Characteristic	High Clearance (not CVC ‘highway’)	Low Clearance (CVC ‘highway’)
Maintenance Activities	Maintain water-bars, drainage dips, culverts, drainage ditches to protect against erosion and damage to the road, clear encroaching brush as needed to allow vehicle passage.	Maintain culverts and drainage ditches, grade surface to protect against erosion and damage to the road, clear encroaching brush to provide sight distance.
Road Conditions	Rutting, rock-fall, and many water bars or drainage dips make driving surface rough.	Grading provides relatively smooth surface suitable for use by low-clearance

Table 1 – Comparison of Road Types		
Characteristic	High Clearance (not CVC ‘highway’)	Low Clearance (CVC ‘highway’)
	Short sight distances and narrowed travel way due to encroaching vegetation.	vehicles. Sight distance improved by brushing of encroaching vegetation.
User Experience	Rough ride, slow speeds, more challenging driving experience.	Relatively smooth ride with some minor to moderate rough spots. Sight distance and surface conditions allow for prudent driving speeds up to 25 mph.
Resource Effects	Narrower maintained / traveled surface provides less disturbed area for erosion; frequent waterbars reduce incidence of concentrated runoff; average annual sediment production ~95 – 108 tons/mile ⁷ .	Wider maintained / traveled surface provides more disturbed area for erosion; side-sloped or crowned graded surface reduces incidence of concentrated runoff, but effectiveness is often compromised by minor rutting; average annual sediment production ~158-166 tons/mile.

⁷ MNF Forest Scale Roads Analysis, 2003; Appendix 3.3, p. A3.3-29. The model used to estimate these values is accurate to +/-50%, so these figures are best used for comparison of alternatives rather than as absolute estimates.

PROPOSAL MAP

Alternative 2 – No Action

Under the No Action alternative, no change in road management objective for this segment of M3 would be made, and it would not be designated for mixed use. Therefore OHV use would not be allowed on these segments. The existing degree of connectivity in this area would remain at the current level.

Comparison of Alternatives

Table 2 compares how well the alternatives respond to the purpose and need. Because there are no significant issues, there is nothing to compare in that regard.

Table 2 – Comparison of Alternatives		
Item	Alternative 1 M3 Mixed Use	Alternative 2 No Action
36 CFR §212.55 Criteria for designation of roads, trails, and areas⁸.		
(a) General criteria	See MNF decision criteria below.	
(b) Specific trail and area criteria	Not Applicable – the proposed action is a road designation proposal, and it includes no trail or area designations.	
(c) Specific road criteria	1) The volume, composition & distribution of traffic would be altered from the no-action alternative by the addition of OHV traffic; speed would decline as waterbarring and longer maintenance intervals result in rougher driving surface. The roughening of the surface would inconvenience some drivers, particularly those who tow trailers or access the West Crockett Trailhead currently with low clearance vehicles. Log haul turn-around times would be lengthened due to lower speeds. 2) The switch to maintenance for high-	1) The volume, composition & distribution of traffic would remain a mix of high and low clearance vehicles, with traffic related mostly to Snow Mt trailhead access and to deer hunting; occasional log truck traffic would occur (there have been 1 green and 1 salvage sale over the past 10 yrs under the Forest Plan); speed would remain the same – safe up to 25 mph on most sections. 2) Road geometry would remain suitable for low-clearance vehicles, although surface condition may become rougher than desired for low-clearance

⁸ See Appendix C for full text of §212.55.

Table 2 – Comparison of Alternatives		
Item	Alternative 1 M3 Mixed Use	Alternative 2 No Action
	clearance vehicles may discourage or displace some current trailer users from using the area, as well as Snow Mt hikers who have low-clearance vehicles. Alternate areas of the MNF are available to provide similar opportunities. Management for high-clearance vehicles is appropriate for the Forest Plan level of timber harvest from the area.	road management objectives, due to continuing mismatch between maintenance workload and projected funding levels. Management for low-clearance vehicles is not needed to support Forest Plan objectives, especially considering the reduced level of timber harvest from previous levels.
(d) Rights of access	N/A - the proposed action would not affect any rights of access.	
(e) Wilderness & primitive areas	N/A - the proposed action would not establish any motor vehicle routes in wilderness or primitive areas.	
Mendocino National Forest Decision Criteria		
1) Operational Affordability	Managing for high-clearance vehicles would contribute to improved affordability of the MNF road system. Average annual savings in routine maintenance workload are estimated to range from \$1280 - \$1530 ⁹ .	There would be no change in maintenance workload.
2) Low Capital Investment	No capital investment is required.	
3) Balanced Recreation Opportunities	Would increase convenience for hunters who use OHVs to travel between camp and hunting areas. Would inconvenience people who use low-clearance vehicles to access recreation opportunities in the area.	Would continue existing levels and types of motorized recreation opportunity within the area served by this segment of M3.

⁹ This savings should be considered as a ‘right-sizing’ of the workload to the road maintenance funding level rather than as creating a surplus of funding [cost savings calculations based on information from Forest-Scale Roads Analysis Report, Appendix 3.1, Table A3.1- 9].

Table 2 – Comparison of Alternatives		
Item	Alternative 1 M3 Mixed Use	Alternative 2 No Action
4) Quality Motorized Recreation Opportunities	As noted above, quality of opportunity would increase for OHV recreation, and decrease for low-clearance-vehicle based recreation.	No change.
5) Compensatory Tradeoffs	Although the proposed action is not closely associated with the trail 68 closure concurrently being considered, it would add to the existing route mileage that is authorized for OHV use. It could be considered broadly compensatory in that limited sense.	Would not alter the net mileage of routes authorized for OHV use.
6) Cost Efficiency	Would improve cost efficiency by adjusting road maintenance to a lower level more appropriate for the type and amount of traffic associated with Forest Plan management direction. The road was originally designed for much higher log truck traffic, which has since been drastically reduced (due to reallocation of a majority of forested lands from timber production to late successional and riparian reserves).	Would leave the road maintenance level higher than what is appropriate for the type and amount of traffic associated with Forest Plan direction.
7) Forest Plan Compliance	No amendment required for either alternative. The proposed action complies with all applicable resource protection standards (details in Appendix L).	
Environmental effects related to significance factors		
Public Health & Safety	OHV riders on M3 would have a risk of injury-producing collision with passenger vehicles. The risk is relatively low compared to their other	OHV riders' risk of injury accidents on M3 would remain tied to the level of illegal use. Although it would likely be lower than the proposed action, it

Table 2 – Comparison of Alternatives		
Item	Alternative 1 M3 Mixed Use	Alternative 2 No Action
	risk factors, such as single-vehicle or OHV vs OHV accidents.	would also likely grow in step with the general increase in ATV use on MNF.
Heritage Resources	No heritage resources would be affected.	
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.

Chapter 3 - Environmental Consequences

Effects Relative to Significant Issues

No significant issues have been raised¹⁰, therefore there are no related effects to disclose.

Effects Relative to Significance Factors

This subsection addresses environmental effects of the action alternatives related to the NEPA significance factors [40 CFR §1508.27].

Public Health and Safety

Mixed use analysis indicates that the condition of M3 must degrade to a condition suitable for high clearance vehicles before being suitable for mixed use designation. Once that condition develops, designation for mixed use would not constitute a significant public safety risk, based on the following factors.

Accidents between passenger vehicles and OHVs are a public safety risk factor that is associated mixed use roads. The risk is virtually all directed to

¹⁰ Scoping Summary and Issue Identification, September 4, 2007.

the OHV rider, as they have less protection and capacity to inflict injury on folks in a passenger vehicle.

A review of accident statistics on MNF mixed-use roads for the 5 years between 2001 and 2006 indicates that of 40 motor vehicle accidents reported, 6 were between an OHV and a passenger vehicle. For the same period there were 26 single OHV and 6 OHV vs. OHV type accidents on these roads. Also, many more OHV related accidents (125) occurred on the OHV trail system rather than on mixed use roads during that period.

Considering these factors, it appears that OHV riders have more risk of calamity by themselves or on account of their cohorts than an encounter with a passenger vehicle. When the M3 road segment reaches high clearance vehicle conditions as described in Table 1, mixed use of the road is expected to present little added safety risk to riders of OHVs or other vehicles.

When combined with existing health and safety risk factors associated with this segment of M3 (e.g. no reported accidents 2001 through 2006), the cumulative risk level would still be low.

Heritage Resources

The proposed action is an exempt undertaking (Stipulation III(E)) under terms of 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) and can be implemented without further review or consultation. The exemption category is IIC. - activities that do not involve ground or surface disturbance.

Neither public comments nor agency analysis have identified any potential for the proposed action to cause a loss or destruction of significant scientific, cultural, or historical resources.

Federally Listed Threatened, Endangered and Proposed Species & Critical Habitat

The biological assessment¹¹ determined that the proposed action would have no effect on listed species, proposed species or critical habitat. This determination was based on there being no substantive change in the type of use on a road that already exists. That is, even though mixed use would be a change in the class of vehicles allowed, the biological effects of the use by non-highway-legal vehicles are indistinguishable from those of the existing use by highway-legal vehicles. As the proposed action would have no biological effects to add to other existing or foreseeable biological effects, there are no cumulative effects to consider in determining significance.

¹¹ FOREST-WIDE MINOR PROJECT EFFECT DOCUMENTATION FORM, 26 November 2007.

Compliance with Other Environmental Protection Laws and Requirements

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 the proposed action¹² regarding compliance with that direction. The team concluded that it is 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 evaluation (ref. footnote 11) determined that there would be no effect on FS sensitive species, because there would be no substantive change in the type of use of an existing facility. 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 report¹³. The determinations in these documents were based on analysis of direct, indirect and cumulative effects.

National Historic Preservation Act is documented above under the Heritage Resources subheading [pg 12, 13]. Neither public comments nor agency analysis have identified any other environmental protection requirements that apply to the proposed action.

Chapter 4 - Agencies and Persons Consulted

Person or Agency	City of Residence or Office Location
US Fish and Wildlife Service	Red Bluff, CA
Central Valley Water Quality Control Board	Rancho Cordova, CA
North Coast Water Quality Control Board	Santa Rosa, CA

¹² The no action alternative, by definition, cannot violate Forest Plan direction, because the MNF Forest Plan does not compel any action.

¹³ Hydrologic Analysis - OHV Connectivity Travel Management Proposals, 26 November 2007.

List of Appendices

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