Inventoried Roadless Areas, A-B Wilderness
And Un-roaded Areas
Technical Specialist Report
for
Beartooth Front Storm Damage Clean-up and Fuels Reduction Healthy Forests Restoration Act Project – Main Fork Rock Creek and Benbow Area
Environmental Assessment
Custer National Forest

Executive Summary:

No project treatments are proposed in any of the four Inventoried Roadless Areas (IRAs) or the Absaroka-Beartooth Wilderness (A-B Wilderness). There are treatments proposed in the vicinity of the four IRAs and the A-B Wilderness. There are treatments proposed in un-roaded areas of the project area.

There would be no direct or indirect or cumulative effects of the No-Action alternative on any of the four Inventoried Roadless Areas near the project area, the Absaroka-Beartooth Wilderness, or un-roaded areas in the project area.

In the Benbow area and Main Fork Rock Creek portions of the project area, short term, temporary, transient and localized effects in the form of sights, sounds, and smoke would occur as a result of implementing the proposed action. These effects from project related operations may slightly reduce outstanding opportunities for solitude and high quality undisturbed air in IRAs and un-roaded areas during project implementation. On-going and reasonably foreseeable activities that create noise and dust will continue, and generally are short-term, temporary, transient and localized in nature. Short term effects of sights, sounds, and smoke could result in displacement of some recreation users in IRAs and un-roaded areas during project implementation. These displaced recreation users could elect to move to other areas on the Beartooth Ranger District to find solitude, high quality undisturbed air and primitive experiences, such as the A-B Wilderness. Some terrestrial wildlife species could be displaced into other areas, including any of the IRAs, or the A-B Wilderness during and after project implementation. Such effects would be short-term, localized, and often indiscernible from other ongoing and reasonably foreseeable activities.

In the Benbow area, vehicle traffic on NFSR #2414 and ATV and 4X4 vehicle use of road 2415 (Chrome Lake Jeep Trail) creates dust and noise that may be inhaled and heard by forest visitors in the Fishtail Saddleback IRA. Unit 60 is the proposed treatment nearest this IRA in the Benbow area. Because this area is not close to a public access point, NFS Roads 2414 or 2415, or system trails (See Exhibits C-18, C-19, and C-20), forest visitors may experience a cumulative reduction in outstanding opportunities for solitude or a primitive and unconfined type of recreation.

While IRAs in the Main Fork area are less than one kilometer from proposed treatment areas, they are also less than one kilometer from several campgrounds, US Highway 212, and heavily traveled National Forest System Roads. There may be direct and indirect effects related to sights, sounds, or smells (smoke). Such as, when operations are on-going, there will be log truck traffic and noise, equipment noise, dust, and chainsaw sounds. After operations stop and slash clean-up and burning occur, there will be crews, burning, and smoke in the vicinity. Smoke may drift through the areas and sounds may be heard. In addition, on-going human activities as described above will continue. Noise is a regular occurrence during summer months in the Main Fork area, particularly due to motorcycle and RV traffic on US Highway 212 and ATV and vehicle traffic on Glacier Lake Road #2421, Hellroaring Road #2004, and in and out of several campgrounds. Smoke from campfires at campgrounds and dispersed campsites are also common, but do not tend to linger in the Main Fork valley due to typical high winds in the area., During project implementation, noise and smoke from project activities could combine with other on-going noise and smoke in the valley and reduce opportunities for solitude or primitive and unconfined recreation in the A-B Wilderness.. Such cumulative effects would be short-term, localized, and often indiscernible from other ongoing and reasonably foreseeable activities.

Overall, un-roaded areas within the project area do offer limited opportunities for natural appearing landscapes, areas for solitude and primitive/semi-primitive recreation experiences. However, on-going activities will continue to occur. In addition, underlying the Benbow area is the J-M Reef, a part of the Stillwater complex, highly valued for the platinum/palladium found there. Recent locatable claims follow the J-M reef within the Stillwater complex, and could potentially be developed at any time. The Proposed Action is not expected to affect, either directly or indirectly the A-B Wilderness. As noted above there are direct and indirect effects in the form of sights, sounds, and smells to IRAs and un-roaded areas. The effects of implementing the Proposed Action on un-roaded areas in the project areas do not preclude consideration of those areas for wilderness evaluation at the time of Forest Plan revision. These effects, when considered in context and intensity will not be significant pursuant to 40 CFR 1508.27.

Changes between Draft and Final:

During scoping, no one raised an issue related to the effects of the proposal to Inventoried Roadless Areas or the A-B Wilderness. Therefore, there was no specialist report was prepared specific to Inventoried Roadless Areas or effects to the A-B Wilderness characteristics or disclosure of effects to these resources in the draft Environmental Assessment for the Beartooth Front Storm Damage Clean-up and Fuels Reduction Healthy Forests Restoration Act Project – Main Fork Rock Creek and Benbow Area. In response to comments received from Michael Garrity with the Alliance for the Wild Rockies during the pre-decisional objection period (12/5/2008) the Forest Supervisor instructed the Beartooth District Ranger to disclose effects of the proposal on the four Inventoried Roadless Areas near the project area, and the Absaroka-Beartooth Wilderness.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Introduction

No treatments are proposed in any of the four Inventoried Roadless Areas (IRAs) adjacent to the project area, or the Absaroka-Beartooth Wilderness (A-B Wilderness). There are treatment units proposed near IRAs, or the vicinity of the A-B Wilderness, and there are un-roaded areas in the project area, see Project Record Exhibits C-18, C-19, C-20, C-21, C-22, and C-23. This report discloses the potential for effects from the proposed action to those areas.

Assumptions, Methodology & Scientific Accuracy, and Information Used for Analyzing Effects to IRAs, the A-B Wilderness, and un-roaded areas.

The term inventoried roadless area (IRA) refers to an area usually of at least 5,000 acres without developed or maintained roads, and substantially natural condition that was inventoried as part of either the National Roadless Area Review (RARE II, 1979) process or the Land and Resource Management Planning process. There are four Inventoried Roadless Areas adjacent to the project area: Fishtail Saddleback IRA (#01366); Red Lodge Creek IRA (#01363); Line Creek Plateau IRA (#01911); Rock Creek IRA (#01913) (See Project Record Exhibits C-20 and C-23). The A-B Wilderness is 4.8 kilometers to the south of the Benbow area treatment units, and 800 meters northwest of the Main Fork Rock Creek treatment units (See Exhibits C-19, 22, and C-23) . This analysis qualitatively evaluates effects of the no action and proposed action alternatives to Inventoried Roadless Areas, the A-B Wilderness, and un-roaded areas.

This analysis does not re-evaluate the condition of IRA roadless or wilderness characteristics or suitability of IRAs – such an evaluation was accomplished by the Forest Plan for the Custer National Forest (Forest Plan Appendix C). These evaluations were reviewed and found to be adequate for the understanding of the effects of this proposal on IRAs given the limited nature of potential direct and indirect effects. A more detailed analysis is not necessary, and there have been few changes since the Forest Plan decision was made. The Forest Planning process prepared an inventory of roadless lands and evaluated National Forest System lands administered by the Custer National Forest for the purpose of recommending wilderness. Appendix C of the 1986 Custer National Forest and National Grasslands Land and Resource Management Plan (hereafter Forest Plan) contains detailed information and maps for each of the roadless areas on the Custer National Forest included in the 1983 roadless area inventory (USDA 1986, Appendix C). The Forest Plan specifically analyzed and evaluated inventoried roadless lands and provides specific analysis of wilderness suitability.

This analysis does not re-evaluate the current condition of wilderness characteristics in the A-B Wilderness or suitability of the A-B Wilderness as a wilderness area because that is beyond the scope of this analysis and the decision to be made. This evaluation was accomplished by the US Congress for 1978 designation of the A-B Wilderness as wilderness. Rather, the purpose of the Proposed Action as disclosed in the Purpose and Need section in the EA, reads in part:

- Improve the ability to control and/or suppress wildfires to protect human and natural resources in the project areas.
- • Reduce the risk to wildland firefighters and residents of the wildland-urban interface should a fire occur.
- Improve the ability to safely leave the areas in the event that a wildfire occurs.

This action is needed to respond to increased fuel loads created by the November 2007 storm event. These needs would be addressed by reducing fuel loads, creating fuel breaks, and reducing beetle infestation potential in treatment areas. Fuel breaks and fuel reduction would also serve the purpose of improving overall defensibility of values at risk in the event of a wildfire.

It was in the Colorado Wilderness Act that Congress prohibited "buffer" zones around wilderness (Colorado Wilderness Act of 1980. (Public Law 96-560) (December 22, 1980)). Congressional intent is not to establish "buffer zones" around wilderness areas. By this, Congress means that non-wilderness activities outside wilderness areas should not be precluded by the simple fact that sights and sounds associated with those activities can be perceived from within the wilderness. Concerns have been raised about the meaning of the phrase "of itself" in the context of the buffer zone prohibition. The interpretation has been that, standing alone, the designation of wilderness areas by legislation should not be construed to extend restrictions on non-wilderness sights and sounds to land outside the boundary of the wilderness area. Such non-wilderness sights and sounds would be subject to regulation, if any, flowing only from the application of other law. For example, the fact that a mining operation can be seen or heard from a point within a wilderness area is not sufficient to impose restrictions on that mining operation that are not the result of provisions in other applicable law.

Analyzing the un-roaded character of any area does not have a specific definition or protocol. In general, these areas might possess characteristics similar to inventoried roadless areas.

Description of Spatial Bounds used for effects analysis:
GIS analysis was utilized to determine where proposed treatments would be closest to the four IRAs and the A-B Wilderness. Effects analysis was completed for effects of proposed treatment to Fishtail Saddleback IRA (#01366), Red Lodge Creek IRA (#01363), Line Creek Plateau IRA (#01911), Rock Creek IRA (#019130 and the A-B Wilderness.

Roadless area boundary spatial GIS data is from Custer National Forest GIS ArcInfo coverage "d2_rless_08". A-B boundary spatial GIS data is from the Custer National Forest GIS shapefile "a-b_wilderness".

Description of Temporal Bounds used for effects analysis:
A maximum temporal bound of 10 years was utilized because proposed activities could occur over a 5-10 year period. It is most likely that project equipment would only be mobilized into a given area during a period of time to save mobilization costs. Once mobilized, equipment would likely complete operations within a given unit or area before moving to the next area. Thus, such

effects would be of a relatively short duration, but could occur incrementally. Treatment activities may occur for 5 to 10 years, depending on contract term dates and funding.

Past, Present, & Reasonably Foreseeable Future Actions Considered for Cumulative Effects Analysis

Past, present and reasonably foreseeable actions that have occurred and/or are occurring within the analysis areas include roads (a transportation system), recreation, historical mining, timber harvest, fire suppression, flood plain development, and livestock grazing. Activities observed to be occurring on private lands adjacent to the analysis areas include livestock grazing, crop production, irrigation diversions, timber harvest, and subdivision development.

Wildfires and suppression activities have occurred in and around the project area. The size and time of occurrence of these disturbance events are described in the fuels report.

Large scale mining operations for chromite occurred in the 1940's in the Benbow area. The underground mine is located in the upper reaches of Little Rocky Creek, while the historical mill site is located near the lower reaches above the Forest boundary. Recent mineral claims have been filed with the BLM for locatable minerals. These claims follow the J-M reef within the Stillwater complex, that is, they traverse southeast across the area south of the Benbow treatment units. Plans of operations for these claims could be filed at any time and would require project specific NEPA analysis before any operations could occur.

The Beartooth Mountains Oil and Gas Leasing Decision (USDA, 1996) made lands within the project areas, specifically the Benbow area, available for leasing. National Forest System lands in the Main Fork Rock Creek were made not available for oil and gas leasing. Lands within and around the Fishtail Saddleback IRA have been made available for oil and gas leasing subject to a variety of stipulations including surface occupancy, no surface occupancy, timing limitations, controlled surface use. There are no leases within the Fishtail Saddleback IRA. The A-B Wilderness is not available for leasing.

Both the Main Fork Rock Creek and Benbow areas are popular for developed and dispersed recreation activities. Parking for the purposes of dispersed camping is allowed within 300 feet of designated National Forest System Roads.

Past timber harvest activities have been minimal across the analysis area. The soils report notes "There is some evidence of stumps and in some locations old trails. Stumps appear to be small and a result of firewood cutting or post and pole harvest units. The trails appear to be from ATV's or are associated with dispersed recreation sites. Most of the units in the Main Fork and West Fork of Rock Creek are along the road where these areas get a lot of recreation use, both at dispersed and developed sites. No units were identified as having previous commercial timber sale activities." Soils Report, page 4.

Effects of pre-1986 past actions to these IRAs were considered in the Forest Plan evaluation of IRAs. In the Benbow area, past actions considered for cumulative effects analysis are trail and

road construction, construction of irrigation ditch systems, mineral exploration, and grazing all occurred prior to 1986. On-going and reasonably foreseeable future actions considered in the Benbow area are ongoing grazing, mineral and energy exploration and development, use and maintenance of irrigation ditches, noxious weed treatment, aspen treatment, recreational use, dispersed (versus developed) recreation, potential wildfires and associated suppression activities, as well as prescribed fire use.

Effects of pre-1986 past actions to these IRAs were considered in the Forest Plan evaluation of IRAs. In the Main Fork area, past actions considered for cumulative effects analysis are trail and road construction, campground construction, past wildfires, and recreational use, all of which occurred prior to 1986. Reasonably foreseeable future actions considered in the Main Fork area are on-going noxious weed treatments, developed and dispersed recreational use, vehicle traffic on Highway 212, and potential wildfires and associated suppression activities.

Affected Environment of IRAs, the A-B Wilderness, and Un-roaded Areas:

As noted previously, the proposed Benbow treatment units are 4.8 kilometers from the A-B Wilderness, and the West Fork of Rock Creek treatment units 800 meters southwest of the Wilderness. No treatment units lay in the Wilderness. Proposed treatment units near IRAs are displayed in Project Record Exhibits C-20, C-22 and C-23. No proposed treatment units lay in IRAs. There are un-roaded areas, between roads within the Beartooth Front Storm Damage Clean-up HFRA Project Area. In the Benbow portion of the project area, there are several smaller un-roaded areas between National Forest System Roads (NFSR) roads 2414, 241414, 24142, 24147, 24148, 241410B, 241410, 24141, and 2415, in Sections 15, 16, 21 and 22, T5S, R16E. The areas between roads range in size from about 20 acres to about 200 acres. There are two larger un-roaded areas that could be affected by project activities, one of which is south of NFSR 241410, east of 2414, and west of 2415. The other area is west of NFSR 24191 (in Section 25) and east of NFSR 2415 (in Section 22). Proposed treatment units 1, 2, 3, 54, 56, 57, 58, and 59 are interspersed among the above identified roads (See Project Record Exhibits C-18, C-19, and C-20).

The area between NFSRs 2415 and 24191 borders the Fishtail Saddleback IRA to the south, and private ownership to the north in Sections 23 and 25 (See Project Record Exhibits C-18, C-19, and C-20). Proposed Unit 60 is within this area. There is a complex of buildings on private property in Section 25, just north of proposed Unit 60. (See Project Record Exhibit C-18). The road in the south east quarter of the Section, Road 24193, is not a NFSR.

A very small portion of the area east of NFSR 2414 and west and north of NFSR 2415 crosses into the Fishtail Saddleback IRA (See Project Record Exhibit C-18, C-19, and C-20), as does a segment of NFSR 2415. This area is in Sections 21, 22, 27, and 28 (T5S, R16E), south of the grouping of proposed treatment units in Sections 15, 16, 21, and 22, and north of NFSR 2415 (the Benbow Jeep Road). This area is estimated to be about 480 acres in size. There is another area south of NFSR 2415, between the road and Fishtail Saddleback, which is estimated to be about 100 acres in size.

In the Main Fork Rock Creek Area, there are un-roaded areas outside of proposed treatment units and between the NFRSs that could be affected by proposed project activities (See Project Record Exhibits C-21, C-22, and C-23). The proposed treatment areas are approximately 300 meters west of the Line Creek Plateau IRA (#01911), 400 meters east of the Rock Creek IRA (#01913), approximately 520 meters southeast of the Red Lodge Creek Hellroaring IRA (#01363), and approximately 800 meters southeast of the A-B Wilderness. These un-roaded areas mostly traverse in a northeasterly/southwesterly direction and border Red Lodge Creek Hellroaring IRA in the northeast, the A-B Wilderness to the north and northwest, Line Creek Plateau IRA to the south and Rock Creek IRA to the south. As displayed in Project Record Exhibit C-21, C-22, and C-23, these un-roaded areas lay mostly north of NFSR 2004, National Forest System Trail (NFST) 106 and Highway 212, or south and east of Hwy 212. There is a un-roaded portion that lay between NFSR 2421 and NFSR 22004 to the north. Much of the area between Hwy 212 and NFSR 2004 and NFST 106, and traversing along Main Fork Rock Creek is on less steep slopes of about 5 to 35 percent, although slopes are much steeper in Section 18 south of NFSR 2004, usually exceeding 65 percent or more gradients. The other un-roaded areas within the project area are on extremely steep slopes, usually exceeding 75 percent or more gradients.

Inventoried Roadless Areas and A-B Wilderness - Effects of No-Action Alternative

Direct, Indirect and Cumulative Effects of the No-Action Alternative on IRAs, the A-B Wilderness, and Un-roaded Areas - ENVIRONMENTAL CONSEQUENCES

There are no proposed treatments in this alternative, therefore there would be no direct, indirect, or cumulative effects to Fishtail Saddleback IRA (#01366), Red Lodge Creek IRA (#01363), Line Creek Plateau IRA (#01911), Rock Creek IRA (#019130 and the A-B Wilderness.

Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity

None identified.

Irreversible/Irretrievable Commitments of Resources should the No Action Be Implemented.

None identified.

Unavoidable Adverse Effects of No-Action Alternative on IRAs, the A-B Wilderness, and Un-roaded Areas

None identified.

IRAs, A-B Wilderness, and Un-roaded Areas - Effects of Proposed Action Alternative

Direct, Indirect, and Cumulative Effects of Proposed Action on IRAs, the A-B Wilderness and Un-roaded Areas

Natural Integrity

There are no proposed treatment activities in the A-B Wilderness or any IRAs. Thus, there would be no change to the existing general appearance. The imprint of man's work would remain unchanged from current conditions within the IRAs and the A-B Wilderness. These areas would continue to appear as if they have been affected primarily by the forces of nature at current levels.

In the Benbow area, the areas in and around proposed treatment Units 1, 2, 3, 54, 56, 57, 58, and 59 have been heavily impacted by past and on-going human activities, principally past mining, but irrigation ditches and power-lines, cross the landscape. Also, as noted above, grazing would continue, as would popular recreational ATV use, personal use firewood cutting. Travel is restricted to designated routes pursuant to the recent Beartooth Ranger District Travel Management decision, as well as the 1986 Forest Plan. Treatments have been proposed in these areas to meet the purpose and need for the project by reducing increased fuel loads created by the 2007 storm event. Treatment activities within each of the units could directly affect the un-roaded areas character. There may be direct and indirect effects related to sights, sounds, or smells (smoke). Such as, when operations are on-going, there will be sawing, log skidding and forwarding operations, log truck traffic and noise, equipment noise, dust, and chainsaw sounds. After operations cease and slash clean-up and burning occur, there will be crews, burning, and smoke in the units and vicinity. Smoke may drift through the areas and sounds may be heard. In addition, on-going human activities as described in the Past, Present, and Reasonably Foreseeable Future Actions Considered for Cumulative Effects section above can be found in the un-roaded areas. Stumps in treatment units may be seen in the short-term (0-5 years), but vegetation in the short-term will grow back - grass, forbs, and shrubs more quickly than trees, and eventually trees. A detailed description of the effects of the proposed action to vegetation is disclosed in the EA and in Appendices A and G, the Fuels and Forest Vegetation reports. Depending on the seed bed available, lodgepole pine can be quickly regenerated. Stumps will gray-over due to weather and decomposition; early seral vegetation will quickly grow back, screening some stumps. Prescribed burning will result in mixed effects depending on burn conditions. Scorch marks may be seen on residual trees, stumps, rocks and in some cases, soils. Natural ecological processes will continue to occur. Some effects from the proposed action, such as the sights, sounds and smoke would be temporary, short-term, transient, localized in nature, and of low intensity. Other effects related to the proposal such as stumps, and vegetative re-growth are longer term, approximately 3-10 years, before effects are not as visible (stumps graying and not directly seen as a result of vegetative re-growth). Evidence of stumps can stay on the landscape for long periods of time, but eventually decaying over time. Stumps from thinning done in and around the developed campgrounds in the Main Fork Rock Creek in the last 15 years are still evident. These longer term effects are of low intensity (a relatively small number of acres being treated and the storm damage has already occurred), transitional as vegetative re-growth occurs and local in nature. These shorter- and longer-term effects may affect un-roaded areas, as described, however, the un-roaded areas within the Benbow area provide some limited opportunities for natural appearing landscapes, solitude and primitive/semi-primitive experiences, though they likely would not be the high quality opportunities already available on the Beartooth Ranger District. These effects, short-term and longer term, when considered in context and intensity are not significant.

In Section 25 of the Benbow area is proposed Unit 60. There is a relatively large amount of storm damaged trees in this proposed unit, broken tops, root sprung trees, etc. There have been reports that the blow-down and storm damaged trees and debris is affecting travel through the area by big game wildlife species. Treatment activities within the unit could directly affect the un-roaded area character because management activities are proposed. There may be direct and indirect effects related to sights, sounds, or smells (smoke). Such as, when operations are on-going, there will be sawing, skidding, and log forwarding operations, log truck traffic and noise, equipment noise, dust, chainsaw sounds. After operations cease and slash clean-up and burning occur, there will be crews burning, and smoke in the units and vicinity. Smoke may drift through the areas and sounds may be heard. In addition, on-going human activities as described in the Past, Present, and Reasonably Foreseeable Future Actions Considered for Cumulative Effects section above can be found in this un-roaded area. However, natural ecological processes will continue to occur. Effects from the proposed action would be temporary, short-term, transient, and localized in nature.

The adjacent landowner, and his ranch manager, north of proposed Unit 60 has expressed great interest in seeing the Forest Service successfully treat the increased fuel loading (broken trees and tops, root sprung trees, etc.) that has occurred as a result of the 2007 storm event. This landowner has been an active participant in the project development. He has participated throughout the public involvement processes, including participating in the pre-decisional objection resolution telephone call with the Objectors, Alliance for the Wild Rockies and Native Ecosystems Council.

In the Main Fork Rock Creek area, un-roaded areas surround proposed treatment units and lay between National Forest System Roads and Highway 212, as described above. Proposed mechanical operations would be non-commercial, and may be in the form of larger equipment. There will also be hand work accomplished via chainsaws. There may be direct and indirect effects related to sights, sounds, or smells (smoke). Such as, when operations are on-going, there will be sawing operations, truck traffic and noise, equipment noise, dust, chainsaw sounds. After operations cease and slash clean-up and prescribed burning occur, there will be crews burning, and smoke in the units and vicinity. Smoke may drift through the areas and sounds may be heard. In addition, on-going human activities as described above will continue, noise from campgrounds in the drainage, Highway 212, etc. These effects would likely not be discernable from effects of those activities already occurring.

No change to any of the four IRAs or the A-B Wilderness boundaries is proposed, so there would be no change to the size of these areas and no change in the manageability of these areas. Un-roaded areas have no legal or administrative boundary that sets them apart, but there would be no effects that would preclude un-roaded areas from being analyzed for wilderness consideration at some other future time.

There no activities are proposed in any of the four IRAs or the A-B Wilderness, therefore there are no effects to ecological, geological, or other features of scientific, educational, scenic, or historical value within these areas. Other resource disciplines have not identified any areas of ecological, geological, or other features of scientific, educational, scenic, or historical value (see

other resource areas sections in the EA and reports); therefore there would not be any effects to these features in un-roaded areas, in either the Benbow or Main Fork Rock Creek areas.

There would be no effects to high quality or undisturbed soil and water in any of the four IRAs or the A-B Wilderness. The IRAs and un-roaded areas are up-drainage away from areas directly affected by project activities. In the un-roaded areas soil and water quality are protected because of project wide and site specific design and mitigation measures in disclosed in the EA in Table 5 (See Table 5. Action Alternative Project Wide and Site Specific Design & Mitigation Measures), and the Forest Service must comply with the Clean Water Act and Clean Air in the conduct of activities (See Appendices A, C, the Fuels and Hydrology reports prepared for the project).

There would be no effect to sources of public drinking water in any of the IRAs or the A-B Wilderness because there are no identified sources of public drinking water in any of the IRAs, the A-B Wilderness, or the un-roaded areas.

Opportunity for Solitude and Primitive Experience

There would be no effect to primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation in IRAs, or the un-roaded areas because no changes to travel management are proposed as part of this project. No activities are proposed in any IRAs, and the temporary roads proposed in the Benbow area in proposed Units 1, 56, and 60 are subject to project design features that require its obliteration (See Table 5. Action Alternative Project Wide and Site Specific Design & Mitigation Measures, in the EA). There is no permanent road construction proposed for any treatment areas.

There would be direct and indirect effects of sights, sounds, and smoke created during project implementation that may decrease outstanding opportunities for solitude or a primitive and unconfined type of recreation in the IRAs, A-B Wilderness, or the un-roaded areas while project activities are occurring. Sights and noise generated by equipment or machinery cutting and removing standing and downed trees and project-related road traffic would be localized, short-term, temporary and transient, and could slightly decrease opportunities for solitude in IRAs, the A-B Wilderness, and the un-roaded areas in the Main Fork Rock Creek and Benbow areas. While pile burning would be conducted under State of Montana air quality requirements (See Appendix A, the Fuels report), smoke generated by pile burning could slightly decrease opportunities for solitude in IRAs and affect high quality air in the IRAs, the A-B Wilderness, and the un-roaded areas when occurring. Noise from project implementation and smoke from pile burning may detract from dispersed recreationists seeking primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation while such activities are occurring. This could result in displacement of use to other areas while such activities are occurring (See Appendix D, the Recreation report prepared for the project). Effects would be temporary (only occurring during operating periods), transient (as the operations move from treatment area to treatment area, related sites and sounds also move), and localized in nature (sites, sounds, and smoke related to project implementation will occur within treatment units), although, smoke would likely drift to other areas, depending on conditions. Visibility of

operations is dependent on a Forest visitor's position relative to the operations. Topography, vegetation and distance all affect a Forest visitor's ability to see the operations. Wind, vegetation, and topography all affect a visitor's ability to hear project operations. Wind and vegetation reduce sound effects to relatively short distances, often times a quarter-mile or less, but then can also carry sounds to greater distances, up to half mile or more. Operations will likely appear sporadic or non-existent to most Forest visitors, as tree cutting and removal would generally occur in a given unit or areas within a matter of weeks, piles would generally be consumed by fire within a matter of hours or days, and burning would be accomplished under atmospheric conditions that would allow for smoke dispersal. Longer term effects that a Forest visitor might see after operations have ceased and several years (1-10 years) into the future will be evidence of stumps, regardless whether it is a commercial or non-commercial operation because fuels work done with a chainsaw still leaves a stump, and effects from prescribed fire, whether pile (landing or hand piles) or broadcast, jackpot or some other method of prescribed fire. A detailed description of the effects of the proposed action to vegetation is disclosed in the EA in the forested vegetation section and Appendix G, the Forested Vegetation report prepared for this project. Depending on the seed bed available, lodgepole pine can be quickly regenerated. Stumps will gray-over due to weather and decomposition; early seral vegetation will quickly grow back, hiding some stumps. Prescribed burning will result in mixed effects depending on burn conditions. Scorch marks may be seen on residual trees, stumps, rocks and in some cases, soils. These other effects related to the proposal such as stumps, and vegetative re-growth are longer term, approximately 1-10 years, before effects are not as visible (stumps graying and not directly seen as a result of vegetative re-growth). These longer term effects are of low intensity (a relatively small number of acres being treated and the storm damage has already occurred), transitional as vegetative re-growth occurs and local in nature. These shorter- and longer-term effects may affect un-roaded areas, as described; however, the un-roaded areas within the Benbow area do provide some limited opportunities for natural appearing landscapes, solitude and primitive/semi-primitive experiences, though they likely would not be the high quality opportunities already available on the Beartooth Ranger District. The un-roaded areas are closer to the Forest boundaries and hence other ownerships where there are on-going activities, as described above. The un-roaded areas lay in Forest Plan management areas that allow for treatment activities such as those proposed in this project, next to roads where there will be sights and sounds and disturbances related to on-going activities. A Forest visitor seeking a un-roaded experience may find a lower quality experience because of all these factors.

In the Benbow area, the nearest treatments to an IRA are proposed in unit 60, approximately 80 meters east of the Fishtail/Saddleback IRA. One of the un-roaded areas is south of Unit 60. The other is south of Units 58 and 59. Noise and smoke from implementation would be heard and smelled by forest visitors using this area during implementation. Given the distance of Unit 60 and the un-roaded area from a public access point, open road, or system trail (See Project Record Exhibit C-18, C-19, and C-20), forest visitors would experience a reduction in opportunities for solitude or a primitive and unconfined type of recreation. It is unlikely that any noise could be heard or smoke could be smelled in the A-B Wilderness from any of the proposed Benbow area treatments, which would occur several kilometers north of the A-B Wilderness. Direct effects related to operations would be shorter-term, temporary, transient, and localized. Effects would likely appear sporadic or non-existent to most Forest visitors, as tree cutting and removal would

generally occur in a given unit within a matter of weeks, piles would generally be consumed within a matter of hours or days, and burning would be accomplished under atmospheric conditions that would allow for smoke dispersal. Some of the same longer-term effects to vegetation and treatment units could be seen, stumps and effects of burning – scorch marks, blackened rocks or soil. This longer term effects are not significant to soils, water, wildlife, vegetation or recreation as the effects are described in each of the respective sections of the EA and the specialists reports. As described above, in context, sights, noise, and smoke effects are temporary, transient, localized in nature, the scope of the activities and effects is limited. Irrigation ditches cross the landscape in the grouping of units near Units 58 and 59, and pass through Unit 60. There are roads in and around Units 1, 2, 3, 56, 57, 58, and 59. There are roads in Unit 60 and these roads are proposed for use should the project be implemented. There is evidence of human activities throughout Unit 60. The un-roaded areas possess only a low to moderate potential for primitive recreation, especially when compared with other areas of higher quality on the Beartooth Ranger District.

Diversity of plant and animal communities and habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land would be affected by the Proposed Action. No direct alteration of habitat for any species would occur within any of the four IRAs or the A-B Wilderness. Any indirect impacts to terrestrial species would consist of short-term displacement to areas distant from treatment units while implementation is occurring (see project Wildlife report). Alteration of habitat within treatment units could also result in longer-term displacement of some species, that is, they would move to other areas (See Wildlife section in EA and Appendix E, the Wildlife report prepared for this project). IRAs, the A-B Wilderness, and the un-roaded areas would serve as areas for such displaced species to inhabit. Additional analysis and disclosure of effects to species and habitats in IRAs and other affected areas are disclosed in the Wildlife, Fisheries, Noxious Weeds, and Sensitive Plants technical specialist reports for this project (See Appendices E, F, I, and J, respectively).

Appearances and Attractions

There are no identified reference landscapes in any of the four IRAs; nor are there any in the un-roaded areas in the Benbow area or the Main Fork Rock Creek. Therefore, there would be no effects to reference landscapes.

There would be no effect to natural appearing landscapes with high scenic quality in IRAs because no activities are proposed that would affect natural appearing landscapes or scenic quality in IRAs. As disclosed above, direct and indirect effects to un-roaded areas would be shorter-term sights, sounds, and smoke. Other longer-term effects would be the result of stumps, burning, and vegetative re-growth. Forest visitors would experience on-going activities, as disclosed above.

There would be no effect to in IRAs or the A-B Wilderness. An analysis of the effects of the proposed treatment units has been conducted and those effects are disclosed in the Heritage Resources section in the EA.

There are no other locally identified unique characteristics in these IRAs or un-roaded areas, so there would be no effect to locally identified unique characteristics in IRAs.

Mitigations Included in Proposed Action for IRAs, the A-B Wilderness, Un-roaded Areas

No mitigations are needed in the IRAs or the A-B Wilderness as there are no proposed treatment activities in these areas. See Table 5. Action Alternative Project Wide and Site Specific Design & Mitigation Measures in the EA for those actions that will be implemented in the project area and in proposed treatment units. Treatment units are proposed in un-roaded areas, that is, areas between roads, but no design features are specific to address effects to un-roaded areas. Rather, these design features are part of the Proposed Action and in many instances are normal operating procedures the Forest Service follows to comply with law, regulations and policies. For example, they include and are not limited to Best Management Practices for the conservation of soil and water resources, applying Streamside Management Zone Law and Rules, stopping operations should a heritage site be found, traffic safety plan, obliteration of temporary roads, low stumps proposed in the Main Fork Rock Creek to reduce the visible effect of treatments and be consistent with Forest Plan Visual Quality Objectives, etc.

Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity

There are no anticipated short-term or long-term effects to the A-B Wilderness. Prescribed burning will be done to comply with State of Montana air quality requirements and should address the possibility of short-term effects, via smoke, to the Wilderness. There would be no effect to long-term productivity.

Any effects to the IRAs would be temporary, short-term, transient, and localized. There would be no effect to long-term productivity in the IRAs.

In un-roaded areas in the project area, short-term use would result in the cutting of storm-damaged trees and removal, and planned natural regeneration would ensure the timely reforestation of treatment units, consistent with the National Forest Management Act (NFMA) and the Forest Plan. Treatments are proposed with the intent of maintaining and enhancing long-term productivity using ecological principals for fuels, visual resources, hydrology, recreation, wildlife, fish, forest vegetation, noxious weeds, non-forested vegetation, sensitive plants, and heritage resources (See the EA, as well as the appendices to the EA).

Irreversible/Irretrievable Commitments of Resources Should the Proposed Action Be Implemented.

There are no irreversible commitments of resources to the IRAs, the A-B Wilderness or un-roaded areas. Treatment activities in un-roaded areas do not preclude its consideration for wilderness at some future time.

Short-term effects from sights, sounds, and smells may make use of a un-roaded area temporarily irretrievable. That is, the time those areas are unavailable for that use cannot be recovered. In the interim, there are other areas on the Beartooth Ranger District available for Wilderness or primitive recreational experiences. However, it is not irreversible, nor does it preclude those un-roaded areas from consideration as wilderness at some future time. Vegetation grows back in time. Stumps gray and decay over time becoming less visible. Effects of prescribed burning also diminish over time and make vegetative re-growth in some areas more vigorous. Vegetative treatments effects are temporary and are not irreversible. Growth of vegetation transitions to an early seral stage, grass, forbs and shrubs regenerate in the areas treated, with planned reforestation occurring via natural regeneration methods. Tree growth is foregone (irretrievable) for a period of time, until younger more vigorous trees regenerate and occupy a site. See the Fuels section in the EA and Appendix A, the Forested Vegetation section in the EA and Appendix G, as well as the Noxious Weed and Range section and Appendix I, specialist reports all prepared for this project. Considering the above, and the disclosure of short-term and longer term effects of the proposed action in context and intensity, these irretrievable effects are temporary (1 to 10 or 15 years) and are not significant

Unavoidable Adverse Effects of Proposed Action on IRAs, the A-B Wilderness, and Un-roaded Areas

As described above, prescribed burning will be done to comply with State of Montana air quality requirements; therefore there should be no unavoidable adverse effects to the A-B Wilderness, as a result of prescribed burning. There are no Proposed Action treatment activities in the A-B Wilderness; therefore, there are no unavoidable adverse effects as a result of those activities.

There are no Proposed Action activities in any of the four IRAs in the vicinity of the proposal. Prescribed burning may indirectly affect IRAs via smoke but will be done to comply with State of Montana air quality requirements; therefore, there are no unavoidable adverse effects as a result of those activities. There are no other Proposed Action activities in IRAs and the effects to those areas have been disclosed. There are no unavoidable adverse effects to IRAs.

There are un-roaded areas within the project area and treatment activities have been proposed in some of those areas. The effects of implementing the Proposed Action have been disclosed above, and there are no unavoidable adverse effects to un-roaded areas within the project area.

Conclusions for Environmental Consequences of Proposed Action on the four IRAs, the A-B Wilderness, and un-roaded Areas

Historic management activities, including logging, mining, mineral exploration, grazing, noxious weed treatments and recreation have occurred in IRAs, the A-B Wilderness, and un-roaded areas in the project area. It is unlikely that a Forest visitor using the A-B Wilderness would experience direct, indirect effects of implementation of the Proposed Action, in the Benbow area whether from short-term effects from sights, sounds or smoke. The distance from treatment units is several kilometers. In the Main Fork Rock Creek, as noted above, smoke may be detected by a Forest visitor using the A-B Wilderness during implementation of prescribed burning, but may not be discernable from other on-going activities within the drainage, must be done pursuant to

Montana State air quality laws, and these effects would generally pass in a few days time. There are no long-term or cumulative effects to the A-B Wilderness. There would be no cumulative effects resulting from project activities and historic management in IRAs, or the A-B Wilderness because no project activities are proposed in those areas. No direct physical disturbance is proposed in any of the four nearby IRAs or the A-B Wilderness. There would be limited, short-term and longer-term effects to un-roaded areas character within the project area, in the form of sights, sounds, and smells, as described above. These effects are of low intensity, site specific (local), temporary, and transient (moving from unit to unit as operations are implemented. Stumps and burn/scorch marks may be visible over a period of 1 to 10 years, but will fade and decay over time. These direct, indirect, and cumulative effects are not significant when considered in context and intensity of the proposed action treatments.

The possible effects of the Proposed Action to the IRAs, the A-B Wilderness, or the un-roaded areas in the project area, on the human environment are not highly uncertain and do not involve unique or unknown risks, and are not likely to be highly controversial.

The proposed action does not establish a precedent for future actions with significant effects or presents a decision in principle about future consideration. The effects of implementing the Proposed Action on un-roaded areas in the project areas do not preclude consideration of those areas for wilderness evaluation at some future time.

The proposed action is not related to other actions with individual insignificant but cumulative significant impacts.

As disclosed in this analysis, the proposed action does not adversely affect districts, sites, highway structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor does it cause loss or destruction of significant scientific, cultural, or historic resources. See the Heritage Resources analysis disclosed in the EA and specialist report in the project record.

As described above, the proposed action does not violate Federal, State, or local law or requirements imposed for the protection of the environment.

The effects of the Proposed Action, as describe above, would not result in significant environmental effects when considered in context and intensity (40 CFR 1508.27).

Findings of Consistency

The No Action Alternative is consistent with the 1964 Wilderness Act, National Forest Management Act and Forest Plan forest-wide goals, objectives, and standards and management area direction and standards for the Custer National Forest. This is because there are no activities proposed in the A-B Wilderness.

The No Action Alternative is consistent with the National Forest Management Act and Forest Plan forest-wide goals, objectives, and standards and management area direction and standards for the Custer National Forest, in regards to Inventoried Roadless Areas, because there are no

standards for IRAs in the Forest Plan. There are no activities proposed in Fishtail Saddleback IRA (#01366), Red Lodge Creek IRA (#01363), Line Creek Plateau IRA (#01911), Rock Creek IRA (#01913)

Under the No Action Alternative fuels and storm-damage treatment activities would not occur in un-roaded areas, because no activities would be implemented. On-going activities, as described above, that may affect these un-roaded areas, previously approved, are consistent with the National Forest Management Act and Forest Plan forest-wide goals, objectives, and standards and management area direction and standards for the Custer National Forest

The Proposed Action is consistent with the National Forest Management Act and Forest Plan forest-wide goals, objectives, and standards and management area direction and standards for the Custer National Forest. See the Forest Plan specific management areas for applicable standards.

There are no activities proposed in Fishtail Saddleback IRA (#01366), Red Lodge Creek IRA (#01363), Line Creek Plateau IRA (#01911), Rock Creek IRA (#01913)

There are proposed treatment activities in un-roaded areas that are consistent with Forest Plan forest-wide goals, objectives, and standards and management area direction and standards. On-going activities already decided upon through previous decisions will continue and are consistent with Forest Plan goals, objectives, and standards. There are no standards for sounds or smells in the Forest Plan, and any effects to visual quality are addressed through the visual effects analysis disclosed in the EA and Appendix B to the EA and Visual Quality Objectives in the Forest Plan.

_/s/ Mark Slacks_____ __6 February 2009

SPECIALIST SIGNATURE DATE

References Cited for Specialist Report

Public Law 88-577 (16 U.S. C. 1131-1136). The Wilderness Act of 1964. Available online at: http://www.wilderness.net/NWPS/documents//publiclaws/PDF/16_USC_1131-1136.pdf

Public Law 95-249 legislation designating Absaroka Beartooth Wilderness, March 27, 1978. http://www.wilderness.net/index.cfm?fuse=NWPS&sec=wildView&WID=1&tab=Wilderness%20Laws

Public Law 96-560 Colorado Wilderness Act of 1980. December 22, 1980. http://www.wilderness.net/index.cfm?fuse=NWPS&sec=legisoverview

USDA Forest Service 1986. Custer National Forest Land and Resource Management Plan Appendix C Roadless Area Evaluation.

USDA Forest Service. 1986. Custer National Forest and National Grasslands Land and Resource Management Plan. USDA Forest Service, Billings, MT. 186 pages. Available online at: http://www.fs.fed.us/r1/custer/projects/environmental/index