



File Code: 1570-1
#97-04-00-0038

Date: Sept. 2, 1997

Mr. Matt Holford, President
Northeastern Nevada Chapter
of Trout Unlimited
P.O. Box 5882
Elko, NV 89802

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

RE: Appeal #97-04-00-0038 of District Ranger David P. Aicher's Decision to Approve Reconstruction of a Portion of the Jarbidge Canyon Road on the Jarbidge Ranger District

Dear Mr. Holford:

In accordance with 36 CFR 215.17, we have reviewed the appeal record for District Ranger Aicher's decision approving reconstruction of the portion of the Jarbidge Canyon Road between Pine Creek Campground and Snowslide Trailhead on the Humboldt-Toiyabe National Forests, Jarbidge Ranger District.

I have also considered the recommendation of the Appeal Reviewing Officer (ARO) regarding the disposition of your appeal. The ARO's review focused on the decision documentation and the objections raised in your appeal. A copy of that recommendation is enclosed. There were no interested party comments.

APPEAL DECISION

My decision is to affirm in part and reverse in part District Ranger Aicher's decision approving reconstruction of a portion of the Jarbidge Canyon Road. I am able to affirm on all issues brought up in the appeal except for Issues 1 and 4. My decision is not to allow this project to proceed until further analysis is completed and disclosure is made of effects regarding a possible road failure, including effects on fisheries; and disclosure is made of site specific effects to sensitive fish from borrow and riprap sites and road reconstruction. I concur with the ARO's recommendation that the effects must be included in the disclosure document. A list of your appeal issues and the Forest Service response to each issue is enclosed.

I am directing the Responsible Official to disclose effects to fisheries from possible road failure, and disclose site-specific effects to sensitive fish from borrow and rip rap sites and road reconstruction. If the project is to proceed, a new decision, which is appealable, is required.

This decision constitutes the final administrative determination of the Department of Agriculture [36 CFR 215.18(c)].

Sincerely,

/s/ Jack A. Blackwell

JACK A. BLACKWELL
Appeal Deciding Officer
Deputy Regional Forester

Enclosures

Decision to Reconstruct the Jarbidge Canyon Road
From Pine Creek Campground to Snowslide Trailhead
Appeal #97-04-00-0038

Northeast Nevada Chapter, Trout Unlimited

ISSUE 1: Proposed road reconstruction "will most likely increase the probability of road failure in subsequent years and cause more rapid degradation of remaining bull trout habitat in the proposed area, thus affecting bull trout population viability."

"Such impacts would also affect the viability of redband rainbow trout in the river as well."

RESPONSE: The Environmental Assessment (EA) does not disclose the potential effects of road failure, nor does it discuss the effects of road failure on fish viability. Since flood events in recorded history have washed out the road and the decision would reconstruct portions of the road within the 100 year floodplain, failure is a possibility (Frederick Report, 11-20-96) (Watershed Assessment, 1997).

DECISION: Reverse the Deciding Officer on this issue.

ISSUE #2: The Biological Evaluation (BE) is a "basic literature review with little, if any, current baseline knowledge regarding the health and status of fisheries within the Jarbidge River system."

RESPONSE: The Biological Evaluation for this project discloses appropriate guidance from the INFISH decision, mitigation measures relevant to bull trout, the best available information regarding fish habitat conditions in the drainage, the best available information regarding the status of the population, and the effects of the alternatives. It discloses the best available data about INFISH Riparian Management Objectives, including woody debris, pools, wetted width:depth ratios, and temperature. The BE also discloses the site-specific effects of the alternatives on fish passage. The determination was made in consideration of scientific literature consisting of a variety of habitat assessments conducted by the unit over the years (Ramsey, 1997; pgs. 22, 28, 29, 30), and population inventories (Ramsey, 1997; pg 31). The determination provides a reasoned and complete synthesis of all this information.

DECISION: Affirm the Deciding Officer on this issue.

ISSUE #3: The watershed analysis was completed and released to Trout Unlimited after the decision was made.

RESPONSE: The Decision Notice was signed by the Deciding Officer on June 2, 1997. The Jarbidge River Watershed Analysis is dated May 21, 1997, or 12 days prior to the decision date. There is no requirement to complete the analysis before the the decision is made. The Decision Notice for the Inland Native Fish Strategy (INFISH) established standards and guidelines for incorporation into Forest Land and Range Management Plans. Specifically, RF-2 requires the analysis to be completed prior to construction of new roads or landings in Riparian Habitat Conservation Areas (RHCA). (INFISH Strategy DN/FONSI, Attachment A pp. 7-8.)

DECISION: Affirm the deciding Officer on this issue.

ISSUE 4: The effects of connected actions to this road project (borrow sources, rip-rap sources, reconstruction) were not addressed in the Environmental Assessment. Effects of these connected actions on sensitive fish species were also not disclosed.

RESPONSE: The EA, Decision Notice/Finding of No Significant Impact (DN/FONSI), and the appeal record do not contain enough information to confirm that the site-specific effects of these connected actions were assessed. The effects analysis requires a clearly delineated project location, which is not found in the documentation for this decision. Therefore, the effects disclosure for these connected actions is incomplete.

DECISION: Reverse the Deciding Official on this issue.

ISSUE 5: Bank stabilization adjacent to Pine Creek will disrupt natural hydrologic flow paths.

RESPONSE: As described in the Environmental Assessment (p. 2-8) the design of channel segments will be done by an interdisciplinary team of specialists. Additionally, project oversight during the layout and implementation would also be done by an interdisciplinary team with the same skills as the design team. Design of the channel would include a detailed survey of the existing channel location and the proposed channel location. Design would include representative sinuosity, wetted perimeter, width/depth ratio, and substrate size using a nearby existing channel to determine hydraulic parameters for design of the channel segment to be reconstructed and stabilized resulting in a channel that is in dynamic equilibrium. A channel in dynamic equilibrium is one that can rapidly adjust to changes in flow rate and sediment yield and still be in equilibrium. This stabilization project would not disrupt the natural hydrologic flow path and would be in dynamic equilibrium.

DECISION: Affirm the Deciding Officer on this issue.

ISSUE 6: Appellant "Seriously questions the economic justification of spending up to \$700,000 to reconstruct 1.5 miles of road to a wilderness trailhead when a less damaging trail could be built for less than 10% of the cost."

RESPONSE: The National Environmental Policy Act (NEPA) requires an economic evaluation (40 CFR 1502.23) but does not mandate a methodology for such analysis. The interdisciplinary team (IDT) chose to use a qualitative, rather than a quantitative, analysis.

The IDT meeting minutes and acceptance of issues and alternatives by the deciding officer clearly point to the importance of the road in order to preserve the continued use of the recreation facilities, as well as maintaining the economic viability of Jarbidge businesses. Several scoping responses identified the importance of the road for continued recreation and economic benefits, even though there are few, if any, quantitative values. (Appendix A of the EA, Letters 2-13.)

Review of the appeal record, specifically the recreation report and the economic report, point to several costs and benefits associated with the road reconstruction. The project will provide for the continued use of four camping areas, wilderness trailhead facilities, improved wilderness management, and improved ability to maintain recreation developments. (Recreation Specialists Report and Economic Report of February 25, 1997 of the Appeal record.)

There would be additional costs for facilities and management if the road is not reconstructed. Though the initial cost is higher than Alternatives 1 or 2, it provides for improved wilderness access and management, and prevents the loss of recreation opportunities. (EA, Chapter 4.)

DECISION: Affirm the Deciding Officer on this issue.

ISSUE 7: "INFISH, as an interim strategy, is not sufficient to ensure viability."

RESPONSE: INFISH, which was approved by the three Regional Foresters on July 28, 1995, was specifically designed to provide interim direction to protect habitat and populations of resident native fish. Bull trout were explicitly one of the considerations and projects were screened for effects on bull trout in priority watersheds for the species. (INFISH Strategy DN/FONSI.)

In a recent court decision, the court stated: "The Forest Service intended INFISH to be a short-term, interim strategy, and it is currently working on a more permanent, long-term strategy, the Interior Columbia Basin Ecosystem Management Project (ICBEMP). Moreover, in adopting INFISH, the Forest Service consulted viability studies, identified high priority watersheds for bull trout on the basis of promoting diversity and viability, and screened forest projects and activities within those watersheds to reduce their impact on bull trout." [Friends of the Wild Swan V. U.S. Forest Service, (DC OR) (1997)]

The court concluded that the Forest Service did not act arbitrarily and capriciously in adopting INFISH with regard to providing for bull trout viability.

DECISION: Affirm the Deciding Officer on the issue.

ISSUE 8: TU during the EA process has found a lack of information to help make an informed decision.

RESPONSE: The District has provided Trout Unlimited with all information requested in a timely manner. (October 28, 1996 request - reply on November 12, 1996; October 19, 1996 request - reply on November 17, 1996; April 21, 1997 request - reply on April 23, 1997. TU's October 19 and 28 requests were initially denied because the Predecisional EA was withdrawn, but all information requested was provided on March 28, 1997, when the Predecisional EA was distributed for public review. On April 18, 1997, the IDT met with Trout Unlimited to discuss the predecisional EA and answer any questions about the proposal. Trout Unlimited did not raise many questions about the proposed action at this meeting. (Meeting Notes from 4/18/97 meeting.)

DECISION: Affirm the Deciding Officer on this issue.



File Code: 1570-1
Route To:

Date: August 28, 1997

Subject: Jarbidge Canyon Road Reconstruction (#97-04-00-0038)
Appeal Reviewing Officer Recommendation

To: Jack Blackwell, Appeal Deciding Officer

Following is my rationale and recommendation regarding Northeastern Nevada Chapter of Trout Unlimited's July 16, 1997 appeal of District Ranger, Dave Aicher's, June 2, 1997 decision on the Jarbidge Canyon Road Reconstruction Project. This project is located on the Jarbidge Ranger District.

During the week of July 21, 1997, District Ranger, Dave Aicher, contacted Appellant offering to meet and discuss resolution of the appeal issues. On July 30, 1997, Appellant declined the offer.

The appellant has about 15 specific concerns in the appeal. However, my review of the appeal and the record leads me to believe that appellant's primary issues can be synthesized to the following:

- 1.) whether or not public involvement procedures were followed (Appeal, pages 2-3);
- 2.) whether or not INFISH interim direction, as amended by the May 21, 1997, Jarbidge Watershed Analysis (WA), is adequate to assure no trend toward listing of the bull trout (Appeal, pages 1, 11, and 12);
- 3.) whether or not the selected alternative, as described in the Decision Notice/Finding of No Significant Impact, and the effects and mitigation measures disclosure in the Environmental Assessment (EA): a.) adequately respond to INFISH riparian management objectives (RMOs), watershed analysis recommendations, and Biological Evaluation (BE) findings and recommendations (Appeal, pages 1, 2, 6, 9); and
- 4.) whether or not enough detail about the selected alternative is disclosed: a.) for the District Ranger to make a reasoned choice, b.) to understand what mitigation and other measures will be taken to assure meeting INFISH objectives and standards and guidelines, and being responsive to BE and Jarbidge WA recommendations, and c.) to conclude that no significant impacts would occur (Appeal, pages 2, 6, 7, 10).

The appellant has sought the following relief:

1. in a November 13, 1996 Trout Unlimited Newsletter, appellant requested that an Environmental Impact Statement be done;
- 2.) in this July 16, 1997 appeal, appellant asks for the selected alternative to be rejected and EA Alternative 2 be modified as follows:

- a.) eliminate the road from Pine Creek Campground to Snowslide Trailhead and replace it with a trail capable of supporting foot and horse traffic and include appropriate signing;
- b.) remove existing bridges and culverts leading to the former Snowslide trailhead;
- c.) perform in-stream habitat restoration; and
- d.) remove the existing Snowslide Trailhead toilet to another campground (Appeal, pgs. 17-18).

In a May 1, 1997 letter, the national office of Trout Unlimited concurs with their Northeastern Nevada Chapter's rejection of the selected alternative and proposal for a modified Alternative 2.

Findings:

Chronology of project including public participation

In a 1950 Project Initiation letter dated January 10, 1996, District Ranger Dave Aicher documented that he believed the primary issues in the project area are ". . . bull trout and the loss of access to designated and developed recreation sites."

A scoping notice was issued March 25-27, 1996; a preliminary Environmental Assessment (PEA) was completed October, 1996; a notice for comment on the PEA was released October 23, 1996; a PEA comment period withdrawal notice was issued November 13, 1996 and a revised PEA was completed March, 1997 with a notice for comment published April 2, 1997. The Biological Evaluation was completed March 21, 1997 and the Jarbidge Watershed Analysis (WA), with input from Nevada Division of Wildlife and Idaho BLM, was completed May 21, 1997. In April and May of 1997, the project interdisciplinary team focused on review and response to the public comment on the March, 1997 PEA and preparation of the final Environmental Assessment (EA); the Decision Notice/Finding of No Significant Impact (DN/FONSI) was signed June 2, 1997.

The appeal record correspondence file shows:

- 1.) a project field tour, which appellant attended, occurred July 8-10, 1996;
- 2.) an informational meeting was held with appellant April 18, 1997; and
- 3.) appellant information requests were received on October 19, 1996 and April 21, 1997 and the District responded to both requests.

Appellant's timely appeal was received July 16, 1997. Appellant provided written response to the scoping notice, PEA, and EA. July 30, 1997, appellant declined offer from the District Ranger to meet and discuss resolution of the appeal issues.

Adequacy of INFISH direction to assure no trend toward Federal listing of bull trout

INFISH interim riparian habitat management goals and objectives, standards and guidelines, and encouragement to provide site-specificity through watershed analysis to tailor direction to site-specific watersheds (INFISH, page A-2), are best available information. The Upper Columbia River Basin (UCRB) science assessments and draft Environmental Impact Statement (DEIS) preferred alternative aquatic/riparian strategies offer no substantive modification to INFISH (UCRB DEIS, pages 3-73, 3-74, and 3-100 through 3-115). The site-specific Jarbidge WA amended INFISH riparian direction to modify only the width/depth ratio (WA, page 6-1). Since INFISH as amended by the Jarbidge WA is best available information, it seems reasonable to conclude that implementation consistent with that direction will provide reasonable assurance of no trend toward a listing of bull trout.

The Jarbidge watershed has been designated a "priority watershed" in support of the INFISH strategy (EA, page 1-3). A Riparian Habitat Conservation Area (RHCA) was delineated within the project area in accordance with INFISH direction (EA, page 1-3). INFISH riparian objectives and standards and guidelines, applicable to this project, are listed in the EA pages 1-3, 2-10 and 2-11, and the BE, pages 17-19.

EA disclosure in response to INFISH, Jarbidge WA, and BE

The entire project lies within the identified RHCA. The project also lies on the 50 year floodplain (Zone Biologist, J. Frederick Specialist Report, November 20, 1996, page 3). The INFISH standards and guidelines, as amended by the Jarbidge WA, apply to all activities that occur within the RHCA. Actions that reduce habitat quality or retard the rate of recovery would be inconsistent with the INFISH interim RMOs. For INFISH RMOs, "retard" means "to slow the rate of recovery below the near natural rate of recovery if no additional human caused disturbance was placed on the system" (INFISH, page A-3).

INFISH riparian objectives particularly important to this project decision (EA, page 1-3; BE, page 20; INFISH, page A-4; Jarbidge WA, page 6-1) include but are not limited to:

- 1.) pool frequency, 32-70 pools per mile dependent on channel type;
- 2.) no measurable increase in maximum water temperature;
- 3.) 20 pieces per mile of large wood debris, and
- 4.) a width/depth ratio of 30 or less (amended by WA, page 6-1).

The EA (page 4-9) predicts that: 1.) there would be a loss of pools within the 1700 foot reconstruction segments of the proposed action following reconstruction activities, 2.) pools would increase at near natural rates within the project area above the reconstructed segments, 3.) the large plunge pool below the Fox Creek Bridge would be lost but would likely be replaced naturally over time, and 4.) large woody debris recruitment is likely to increase number of pools overall. The WA, page 3-6, states that only 7 percent of the quality pools below the wilderness in the past were formed by large wood. The BE, pages 48-49, agrees that there would be a loss of pools in the river relocation section of the project that would lead to retarding progress toward the RMO for 3-5 years or longer. The BE does not believe a pool of the magnitude existing at the Fox Creek Bridge will develop naturally in this reach of the river. The BE, page 62, concludes the proposed action ". . . would result in a trend away from Desired Future Condition." J. Frederick's Specialist Report, page 8, indicates that existing large woody debris in the stream in the project area provides only 25 percent of the INFISH large woody debris objective. The EA does not provide discussion regarding Specialist Report, BE, and WA findings that would lead to the EA conclusions.

The EA, page 4-9), concludes that maximum stream temperature would be maintained or slightly increase in the 1700 foot of channel reconstruction but, in the long-term, predicts that maximum stream temperature would be slightly reduced. The BE, page 51, is less optimistic, predicting that there will likely be a net loss of shade in the project area which may lead to slightly higher maximum water temperatures. The EA does not respond to the BE conclusions.

The Jarbridge WA points out that only seven percent of the pools in the project area have been formed as a result of large woody debris and recommends the project should emphasize retention of large wood (WA, pages 3-6 and 6-1; BE page 69). Within the project area, current amounts of large woody debris only provide 25 percent of the INFISH RMO (20 pieces/mile > 12" diameter). The BE, page 59, states the proposed action would retard recent progress toward the large wood RMO. The EA suggests a mitigation measure for the proposed action to anchor all large wood removed in suitable locations within the channel. The Road Reconnaissance Report (January, 1996), page 5, states that extensive amounts of debris adjacent to the road need to be removed to protect the road from future damage. The DN/FONSI is silent on any mitigation measures, other than cut, fill, and streambank stabilization, as part of the selected alternative. The EA offers no reconciliation nor disclosure of how the proposed action would lead to an overall expectation that the amount of large woody debris would increase at natural rates within the project area (EA, page 4-9).

The INFISH width/depth ratio was modified by the Jarbidge WA, page 6-1. The BE, page 50, states that reconstructing a 700 foot reach of stream as a B channel would result in a net increase in width/depth ratio and thus retard net progress toward the INFISH Riparian Management Objective. Reconstructing as an A channel would result in a net decrease of the ratio and thus promote progress toward the objective. The EA proposed action, mitigation measure, and consequences sections (EA, pages 2-7, 2-8, 2-9, and 4-9) do not specify channel type. Therefore, it is unclear whether or not the proposed action provides net progress toward the RMO.

In response to watershed/hydrology cumulative effects, the EA, page 4-11, recommends that any surface disturbance be at least 300 feet from the stream. The EA is silent on how much, if any, of the proposed action is greater than 300 feet from the stream.

Specific INFISH Riparian Management Standards and Guidelines (INFISH, pages A-7 through A-14) applicable to this project include but are not limited to:

RF-2 -- Avoid disruption of natural hydrologic flow paths.

RF-4 -- Construct new, and improve existing culverts, bridges and other stream crossings to accommodate a 100-year flood, including associated bedload and debris, where those improvements would/do pose a substantial risk to riparian conditions.

RA-4 -- Prohibit storage of fuels within the RHCA; prohibit refueling within RHCAs unless there are no other alternatives.

The Jarbidge WA, (pages 4-6, 4-7, 4-8, 5-1 and 5-2) states the Jarbidge channel and riparian area are a result of 90 years of modification from human activities. Portions of the river were reconstructed in 1979, 1984, and 1996 and likely on many other occasions. The Jarbidge Road ". . . has been damaged or washed out a number of times since originally constructed" (likely in the 1920's). "Construction and maintenance of the Jarbidge Road and bridge crossings, and keeping the road in the narrow valley bottom has influenced the morphology and function of the Jarbidge River." Physically altering the stream morphology appears to have the most impact on watershed health. The 1995 flood is estimated to be a 30 year event. Flood events of higher magnitude could be "devastating to downstream developments" within the floodplain. It's not clear how the proposed action will "avoid disruption of natural hydrologic flow paths," in accordance with INFISH RMO RF-2.

Neither the south or north Fox Creek bridges will likely accommodate a 100 year flood event (J. Frederick, Zone Biologist Specialist Report, November 20, 1996, pages 10-11). These structures appear to be retarding attainment of RMOs and fall within the substantial risk INFISH criteria (Jarbidge WA, page 5-2). It appears the final EA relied on a January 30, 1996 memo, from Gary Campbell to Claire Josaitis, is the rationale for excluding INFISH RMO RF-4. That memo stated the bridge structures did not fail from the 1995 event. This memo, however, did not have the benefit of the Jarbidge WA (May 21, 1997) findings. The EA is not specific on whether or not the Fox Creek bridges will be replaced with structures that will accommodate a 100 year flood event and the EA is silent on why INFISH RMO RF-4 is

not disclosed in the document (EA, pages 2-7 through 2-11). I find no indication in the Jarbidge WA that INFISH RMO RF-4 should not apply to this project; in fact, just the opposite. There's insufficient detail in the EA preferred alternative description and mitigation measures, and the DN/FONSI selected alternative to determine whether or not this action would be consistent with RMO RF-4.

The EA, page 2-8, proposed action mitigation measures are silent on whether or not fuel storage is prohibited and refueling within the RHCA is the only alternative.

The location and potential effects of borrow sources, apparently needed to implement the selected alternative, for fill, rip-rap, and surfacing material is not clear in the record, EA or DN/FONSI. A map, dated March 18, 1997, titled "Jarbidge Canyon Project, Alternative 3, Road Reconstruction," indicates one borrow source would be located on Section A and one rip-rap source near Bridge Camp Area, north of the Fox Creek confluence. The EA, page 2-7, and DN/FONSI, page 2, state that three to four borrow sources, somewhere between Bluster Mill turnoff and the Snowslide Trailhead, will be needed. I find no specificity as to location or effects analysis in the EA.

DN/FONSI disclosure

The decision (DN/FONSI pages 1-2) does not provide enough detail to determine whether or not the selected alternative is in accordance with INFISH RMOs. Examples include but are not limited to:

1.) INFISH RMOs RF-2 and RF-4 require avoiding disruption of the natural hydrologic flow paths, and bridges, culverts and other stream crossings be designed to accommodate a 100 year flood event including associated bedload and debris (INFISH, page A-8). Zone Biologist, J. Frederick's Specialist Report and the Jarbidge WA indicate that the Fox Creek Bridges likely do not meet these standards unless they were redesigned, existing structures removed, and new structures installed. The DN/FONSI does not provide this specificity nor any rationale why this would be unnecessary to meet the RMOs.

2.) The Jarbidge WA (page 5-2) states that a larger magnitude event than the estimated 30 year event that occurred in 1995, could be devastating to downstream developments within the floodplain. Stream straightening, channelization, removal of woody debris and alteration of the floodplain increases the risk of damaging water flows during high water events. The DN/FONSI (pages 1-3) prescribes a mitigation measure, cut, fill, and streambank stabilization, then in section III. says the decision is to adopt alternative 3 as described in the EA. It is unclear whether or not the decision includes all the mitigation prescribed in the EA alternative 3. If it does, why was one mitigation measure identified in the decision. The DN/FONSI sheds no light on rationale for what mitigation is included or not included nor is their rationale provided in the DN/FONSI on how the selected alternative provides reasonable assurance that INFISH objectives will be met.

Some public comment, including appellant, questioned whether or not the cost of this project, future annual maintenance and repair costs, and the potential for additional future damage, and resulting repair costs, due to recurring flood events are outweighed by the benefits.

The February 25, 1997 Economic Specialist's Report makes no attempt to quantify cost/benefit relationships for this project. The February 4, 1996 Jarbidge Canyon Road Flood Damage Estimated Repair Costs report is the only detailed assessment of project cost that I could find in the record. This document estimates the cost of the proposed action at \$917,520. The EA, page 2-7, states that the proposed action will cost not more than \$700,000. In response to appellant's comment on the EA regarding project economics, the District states that it was an "inherit part of the analysis." I do not find anything in the record that indicates there was quantified analysis of total project benefits and costs including likely outyear benefits and annual maintenance and potential for flood repair.

Conclusions

- 1.) I find that the NEPA related public involvement procedures used for this project are consistent with the Act, implementing regulations, and Forest Service manual and handbook direction.
- 2.) I conclude that INFISH riparian management objectives and standards and guidelines, as amended by the May 21, 1997 Jarbidge Watershed Analysis, are best available information for project direction providing reasonable assurance to not trend toward Federal listing of the bull trout.
- 3.) I can not conclude that there is adequate disclosure in the EA and supporting planning record that the selected alternative provides sufficient assurance that INFISH riparian management objectives and associated standards and guidelines will be met.
- 4.) I conclude that there's insufficient detail and rationale to support the DN/FONSI statements that INFISH objectives will be met and that there's no likelihood of significant impacts. The DN/FONSI is unclear as to what mitigation measures, other than cut, fill, and streambank stabilization, as part of the decision. The DN/FONSI does not disclose what recommendations in the BE and Jarbidge WA are adopted and which are rejected and the supporting rationale. The DN/FONSI does not provide rationale that leads the reader to conclude that the selected alternative is the best choice.

Recommendation:

I recommend that the District Ranger's decision be remanded for: 1.) additional disclosure, and 2.) where needed, supplementation of the planning record to support the additional disclosure.

/s/ Steven A. Brink

STEVEN A. BRINK
Appeal Reviewing Officer