

## Appendix J – RCO Consistency Analysis \_\_\_\_\_

### Introduction

The evaluation of the consistency of each of the five alternatives with each applicable Riparian Conservation Objective (RCO) Standard and Guideline (S&G) from the Sierra Nevada Forest Plan Amendment (USDA 2004) is presented in table form. Following a summary of the analysis in Table J- 1, Table J- 2 shows the rationale for each determination. These tables contain evaluations of only the applicable S&Gs. The checklist documenting which S&Gs are applicable and why is included at the end of this report. Table J- 3 displays specific components of Alternatives 2 through 5 that are not consistent with RCOs, even though these alternatives were determined to be consistent overall.

Appendix B of the DEIS contains route-specific measures that have been specified in order to ensure that routes that would be added to the NFTS are up to standards and that all applicable S&Gs are met. More description, field data forms, notes, and photographs are contained in the Project File at the Sierra National Forest.

**Table J- 1. Summary and Conclusion of the RCO Consistency Analysis for the Sierra National Forest Travel Management Project**

S&G #	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
91	Consistent	Consistent	Consistent	Consistent	Consistent
92	Not Consistent	Consistent	Consistent	Consistent	Consistent
95	Consistent	Consistent	Consistent	Consistent	Consistent
99	N/A	Consistent	N/A	Consistent	Consistent
100	Not consistent	Consistent	Consistent	Consistent	Consistent
101	Not consistent	Consistent	Consistent	Consistent	Consistent
102	Not consistent	Consistent	Consistent	Consistent	Consistent
103	Not consistent	Consistent	Consistent	Consistent	Consistent
105	Not consistent	Consistent	Consistent	Consistent	Consistent
112	N/A	Consistent	N/A	Consistent	Consistent
116	Not consistent	Consistent	Consistent	Consistent	Consistent
117	Not Consistent	Consistent	Consistent	Consistent	Consistent
118	Not Consistent	Consistent	Consistent	Consistent	Consistent
122	Not Consistent	Consistent	Consistent	Consistent	Consistent
<b>SUMMARY:</b>	<b>Not consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>

Each of the Action Alternatives is consistent with the applicable RCO Standard and Guidelines because they include actions that maintain or improve aquatic and riparian conditions. However, each of the five alternatives also leaves known problems unaddressed. In some cases, there are specific components of an alternative that are not consistent. These items are highlighted in Table J- 3. The alternative that adds the most routes to the NFTS (Alternative 5) would also address more known problems than alternatives that add fewer routes (Alternatives 2 and 4). However, by adding those routes to the NFTS, a decision is made to allow whatever impacts are associated with that route to continue into the future. In contrast, routes that are not added to the NFTS will no longer be used and will recover over time. Those routes identified as having the least natural recovery potential and/or the most impacts to aquatic and riparian habitats would be the highest priority for restoration. This restoration would occur under projects that would follow this decision, with no commitment made by this decision for any additional restoration to proceed. It is therefore difficult to determine which of the action alternatives is 'more' consistent than the others. In general, Alternative 4 was designed to provide an emphasis on resource protection; it would not add the most problematic routes to the NFTS, and would rely on additional project funding, analysis, and implementation to take the actions necessary to restore those routes and improve aquatic and riparian habitat conditions.

**Table J- 2. Standards and Guidelines for Riparian Conservation Areas and Critical Aquatic Refuges, Consistency Determination, and Rationale for each Alternative**

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
91. Designate Riparian Conservation Area (RCA) widths as described in Part B of the appendix. The RCA widths displayed in Part B may be adjusted at the project level if a landscape analysis has been completed and a site-specific RCO analysis demonstrates a need for different widths.	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
	Rationale: RCAs were designated as described in Part B of the SNFPA ROD (USDA 2004) and were used in the analysis of each alternative.				
92. Evaluate new proposed management activities within CARs and RCAs during environmental analysis to ensure consistency with the RCOs at the project level and the AMS goals for the landscape. Ensure that appropriate mitigation measures are enacted to (1) minimize the risk of activity-generated sediment entering aquatic systems and (2) minimize impacts to habitat for aquatic-and riparian-dependent plant	<b>Not Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
	Rationale: No mitigation measures would be enacted to minimize sediment delivery to aquatic systems or to minimize impacts to aquatic and riparian habitat. Continuing cross-country use would result in sediment delivery and habitat impacts, which could worsen or	Rationale: Each route and area to be added to the NFTS has been evaluated in the field and has measures specified to minimize the risk of sediment entering aquatic habitats and to minimize impacts to aquatic and riparian habitat (see Appendix A of the DEIS). Prohibiting cross-country use would provide some	Rationale: Prohibiting cross-country use would provide some mitigation of sediment delivery and impacts of unauthorized routes on aquatic and riparian habitats. Impacts would not worsen or expand into new areas. In the long-term, the impacts of these routes on water quality and aquatic	Rationale: Each route and area to be added to the NFTS has been evaluated in the field and has measures specified to minimize the risk of sediment entering aquatic habitats and to minimize impacts to aquatic and riparian habitat (see Appendix A of the DEIS). Prohibiting cross-country use would provide some	Rationale: Each route and area to be added to the NFTS has been evaluated in the field and has measures specified to minimize the risk of sediment entering aquatic habitats and to minimize impacts to aquatic and riparian habitat (see Appendix A of the DEIS). Prohibiting cross-country use would provide some

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
and animal species.	expand into new areas.	mitigation of sediment delivery and impacts of unauthorized routes that are not added to the NFTS. Impacts would not worsen or expand into new areas. In the long-term, the impacts of these routes on water quality and aquatic and riparian habitat would be greatly reduced.	and riparian habitat would be greatly reduced.	mitigation of sediment delivery and impacts of unauthorized routes that are not added to the NFTS. Impacts would not worsen or expand into new areas. In the long-term, the impacts of these routes on water quality and aquatic and riparian habitat would be greatly reduced.	mitigation of sediment delivery and impacts of unauthorized routes that are not added to the NFTS. Impacts would not worsen or expand into new areas. In the long-term, the impacts of these routes on water quality and aquatic and riparian habitat would be greatly reduced.
Riparian Conservation Objective #1: Ensure that identified beneficial uses for the water body are adequately protected. Identify the specific beneficial uses for the project area, water quality goals from the Regional Basin Plan, and the manner in which the standards and guidelines will protect beneficial uses.					
95. For waters designated as 'Water Quality Limited' (Clean Water Act Section 303(d)), participate in the development of Total Maximum Daily Loads (TMDLs) and TMDL Implementation Plans. Execute applicable elements of completed TMDL Implementation Plans.	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
<p>Rationale: Willow Creek is the only Water Quality Limited Segment (WQLS) in the project area. It is on the 303(d) list for temperature, and a TMDL is scheduled to be completed in 2019. Work on the TMDL and Implementation Plan have not yet begun. The cause is believed to be the regulation of flows, combined with accumulation of fine sediment, which results in severely depleted surface flows and, as a result, increased temperature. Streams that flow into Bass Lake do not influence the temperature or sediment in the listed reach. Streams that have the potential to influence this reach are located in Gaggs, Mammoth, and a small portion of Westfall that drains into the North Fork Willow Creek downstream of Bass Lake.</p> <p>The actions of prohibiting cross country, adding features to the NFTS, and making changes to the existing NFTS are not expected to affect stream water temperatures. All actions are designed to minimize sediment delivery. Therefore, the actions are not expected to contribute to the temperature (or fine sediment) issuers in this listed reach.</p> <p>The No Action Alternative is also consistent with this S&amp;G because existing motor vehicle use not been identified as a contributor to the issues in the listed reach.</p>					
99. Prohibit storage of fuels	<b>N/A</b>	<b>Consistent</b>	<b>N/A</b>	<b>Consistent</b>	<b>Consistent</b>

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
and other toxic materials within RCAs and CARs except at designated administrative sites and sites covered by a Special Use Authorization. Prohibit refueling within RCAs and CARs unless there are no other alternatives. Ensure that spill plans are reviewed and up-to-date.	Rationale: No actions will be taken under this alternative that would require refueling or fuel storage.	Rationale: All actions involving the use of equipment needing refueling and fuel storage will follow BMP 2-12, which incorporates the direction in this S&G.	Rationale: No actions will be taken under this alternative that would require refueling or fuel storage.	Rationale: All actions involving the use of equipment needing refueling and fuel storage will follow BMP 2-12, which incorporates the direction in this S&G.	Rationale: All actions involving the use of equipment needing refueling and fuel storage will follow BMP 2-12, which incorporates the direction in this S&G.
Riparian Conservation Objective #2: Maintain or restore: (1) the geomorphic and biological characteristics of special aquatic features, including lakes, meadows, bogs, fens, wetlands, vernal pools, and springs; (2) streams, including in-stream flows; (3) hydrologic connectivity both within and between watersheds to provide for the habitat needs of aquatic-dependent species.					
100. Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.	<b><i>Not consistent</i></b>	<b><i>Consistent</i></b>	<b><i>Consistent</i></b>	<b><i>Consistent</i></b>	<b><i>Consistent</i></b>
	Rationale: Hydrologic connectivity would not be maintained or restored. None of the known locations where unauthorized routes have these impacts would be corrected. Continuing cross-country use would prevent these areas from recovering, and could result in the development of similar impacts in new locations in the	Rationale: Hydrologic connectivity would be maintained, and would be restored where the need was identified on routes that are added to the NFTS. Prohibiting cross-country use would prevent impacts in new locations, and would allow for passive recovery in the long-term.	Rationale: Hydrologic connectivity would be maintained, but would not be restored. None of the known locations where unauthorized routes have these impacts would be corrected. Prohibiting cross-country use would prevent impacts in new locations, and would allow for passive recovery in the long-term.	Rationale: Hydrologic connectivity would be maintained, and would be restored where the need was identified on routes that are added to the NFTS. Prohibiting cross-country use would prevent impacts in new locations, and would allow for passive recovery in the long-term.	Rationale: Hydrologic connectivity would be maintained, and would be restored where the need was identified on routes that are added to the NFTS. Prohibiting cross-country use would prevent impacts in new locations, and would allow for passive recovery in the long-term.

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	long-term.				
<p>101. Ensure that culverts or other stream crossings do not create barriers to upstream or downstream passage for aquatic-dependent species. Locate water drafting sites to avoid adverse effects to stream flows and depletion of pool habitat. Where possible, maintain and restore the timing, variability, and duration of floodplain inundation and water table elevation in meadows, wetlands, and other special aquatic features.</p>	<p><b>Not consistent</b> Rationale: Barriers would not be corrected; the hydrologic characteristics of special aquatic features would not be maintained or restored. Continuing cross-country use would prevent these areas from recovering, and could result in the additional passage barriers and impacts to meadow hydrology in the long-term.</p>	<p><b>Consistent</b> Rationale: Stream crossings added to the NFTS would be improved, if necessary, to ensure that they do not create barriers. The existing hydrologic characteristics of special aquatic features would be maintained by prohibiting cross-country use, and restored in areas that would be added to the NFTS.</p>	<p><b>Cconsistent</b> Rationale: Barriers would not be corrected; the hydrologic characteristics of special aquatic features would be maintained but not restored. Prohibiting cross-country use would prevent the development of new crossings that create barriers, and would allow for passive recovery of existing barriers in the long-term.</p>	<p><b>Consistent</b> Rationale: Stream crossings added to the NFTS would be improved, if necessary, to ensure that they do not create barriers. The existing hydrologic characteristics of special aquatic features would be maintained by prohibiting cross-country use, and restored in areas that would be added to the NFTS.</p>	<p><b>Consistent</b> Rationale: Stream crossings added to the NFTS would be improved, if necessary, to ensure that they do not create barriers. The existing hydrologic characteristics of special aquatic features would be maintained by prohibiting cross-country use, and restored in areas that would be added to the NFTS.</p>
<p>102. Prior to activities that could adversely affect streams, determine if relevant stream characteristics are within the range of natural variability. If characteristics are outside of this range, implement mitigation measures and short-term restoration actions needed to prevent further declines or cause an upward trend in</p>	<p><b>Not consistent</b> Rationale: No mitigation actions or restoration would be implemented. Continued cross-country use could result in declines in stream channel conditions.</p>	<p><b>Consistent</b> Rationale: Mitigation and restoration actions would be implemented, where the need was identified, for routes that are added to the NFTS. Prohibiting cross-country use could prevent further declines in stream</p>	<p><b>Consistent</b> Rationale: No restoration would be implemented; however, prohibiting cross-country use could prevent further declines in stream channel conditions.</p>	<p><b>Consistent</b> Rationale: Mitigation and restoration actions would be implemented, where the need was identified, for routes that are added to the NFTS. Prohibiting cross-country use could prevent further declines in stream channel conditions.</p>	<p><b>Consistent</b> Rationale: Mitigation and restoration actions would be implemented, where the need was identified, for routes that are added to the NFTS. Prohibiting cross-country use could prevent further declines in stream</p>

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
conditions. Evaluate required long-term restoration actions and implement them according to their status among other restoration needs.		channel conditions.			channel conditions.
103. Prevent disturbance to streambanks and natural lake and pond shorelines caused by resource activities (for example, ... off-highway vehicles, ...) from exceeding 20% of a stream reach or natural shoreline. Disturbance includes bank sloughing, chiseling, trampling, and other means of exposing bare soil or cutting plant roots. This standard does not apply to developed recreation sites, sites authorized under Special Use Permits, and designated off-highway vehicle routes.	<b>Not consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
	Rationale: No action would be taken to prevent disturbance from exceeding 20% of streambanks or shorelines. This standard would apply to all unauthorized routes because nothing would be designated.	Rationale: This standard would not apply to designated routes but would apply to Use Areas. SW-28 prohibits motor vehicle use of areas where bank disturbance was identified as a concern. Prohibiting cross-country use would prevent these impacts from occurring and allow any areas with this much disturbance from OHVs to recover in the long-term.	Rationale: Prohibiting cross-country use would prevent these impacts from occurring and allow any areas with this much disturbance from OHVs to recover in the long-term.	Rationale: This standard would not apply to designated routes but would apply to Use Areas. SW-28 prohibits motor vehicle use of areas where bank disturbance was identified as a concern. Prohibiting cross-country use would prevent these impacts from occurring and allow any areas with this much disturbance from OHVs to recover in the long-term.	Rationale: This standard would not apply to designated routes but would apply to Use Areas. SW-28 prohibits motor vehicle use of areas where bank disturbance was identified as a concern. Prohibiting cross-country use would prevent these impacts from occurring and allow any areas with this much disturbance from OHVs to recover in the long-term.
105. At either the landscape or project scale, determine if the age class, structural diversity, composition, and cover of riparian vegetation are within the range of natural variability for the vegetative	<b>Not consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
	Rationale: Impacts to riparian vegetation related to unauthorized motor vehicle use were documented at	Rationale: Each location where an unauthorized route or area that is proposed to be added to the NFTS entered riparian	Rationale: Prohibiting cross-country use would prevent new impacts to riparian vegetation for occurring, and would	Rationale: Each location where an unauthorized route or area that is proposed to be added to the NFTS entered riparian	Rationale: Each location where an unauthorized route or area that is proposed to be added to the NFTS entered riparian

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
community. If conditions are outside the range of natural variability, consider implementing mitigation and/or restoration actions that will result in an upward trend. Actions could include restoration of aspen or other riparian vegetation where conifer encroachment is identified as a problem.	some locations. No determination has been made of whether these impacts are outside the range of natural variability. However, in this alternative, no actions would be taken to correct these impacts. Continued cross-country use could cause them to worsen or expand to new areas.	vegetation was visited in the field. Wherever impacts to riparian vegetation were found, site-specific design measures have been specified to minimize the effects (Appendix A). Prohibiting cross country use will allow for passive recovery of riparian vegetation impacts that have occurred in other areas due to unauthorized motor vehicle use.	allow existing impacts from previous unauthorized motor vehicle use to recover over time.	vegetation was visited in the field. Wherever impacts to riparian vegetation were found, site-specific design measures have been specified to minimize the effects (Appendix A). Prohibiting cross country use will allow for passive recovery of riparian vegetation impacts that have occurred in other areas due to unauthorized motor vehicle use.	vegetation was visited in the field. Wherever impacts to riparian vegetation were found, site-specific design measures have been specified to minimize the effects (Appendix A). Prohibiting cross country use will allow for passive recovery of riparian vegetation impacts that have occurred in other areas due to unauthorized motor vehicle use.
Riparian Conservation Objective #4: Ensure that management activities, including fuels reduction actions, within RCAs and CARs enhance or maintain the physical and biological characteristics associated with aquatic- and riparian-dependent species.					
112. Post-wildfire management activities in RCAs and CARs should emphasize enhancing native vegetation cover, stabilizing channels by non-structural means, minimizing adverse effects from the existing road network, and carrying out activities identified in landscape analyses. Post-wildfire operations shall minimize the exposure of bare soil.	<i>N/A</i>  Rationale: There would be no management activities in recently burned areas under this alternative.	<i>Consistent</i>  Rationale: One route would be added to the NFTS in the Silver Knob fire area (PK29). Drainage features will be constructed on the west end of the route to control runoff and erosion. The exposure of bare soil will be confined to the route and the drain outlets.	<i>N/A</i>  Rationale: There would be no management activities in recently burned areas under this alternative.	<i>Consistent</i>  Rationale: One route would be added to the NFTS in the Silver Knob fire area (JM-57). This route does not require any ground-disturbing activities prior to becoming part of the NFTS.	<i>Consistent</i>  Rationale: Three routes would be added to the NFTS in the Silver Knob fire area (PK29, SR-112, and SR-119). The only ground-disturbing work would be on PK29, as described in the Rationale under Alternative 2.

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
<p>116. Identify roads, trails, OHV trails and staging areas ... during landscape analysis. Identify conditions that degrade water quality or habitat for aquatic- and riparian-dependent species. At the project level, evaluate and consider actions to ensure consistency with standards and guidelines or desired conditions.</p>	<b>Not consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
	<p>Rationale: No actions were considered to ensure consistency with S&amp;Gs or desired conditions as part of this alternative. Unauthorized OHV trails that have been identified as degrading water quality and/or aquatic and riparian habitat would continue to be used and additional routes could develop over time.</p>	<p>Rationale: Prohibiting cross-country use would allow unauthorized routes that have been identified as degrading water quality and/or aquatic and riparian habitat to passively recover in the long-term. In addition, actions would be taken to bring routes that would be added to the system into compliance with S&amp;Gs.</p>	<p>Rationale: Prohibiting cross-country use would allow unauthorized routes that have been identified as degrading water quality and/or aquatic and riparian habitat to passively recover in the long-term. However, aside from discontinuing their active use by motor vehicles, no actions would be taken to minimize the impacts of these routes in the short-term.</p>	<p>Rationale: Prohibiting cross-country use would allow unauthorized routes that have been identified as degrading water quality and/or aquatic and riparian habitat to passively recover in the long-term. In addition, actions would be taken to bring routes that would be added to the system into compliance with S&amp;Gs.</p>	<p>Rationale: Prohibiting cross-country use would allow unauthorized routes that have been identified as degrading water quality and/or aquatic and riparian habitat to passively recover in the long-term. In addition, actions would be taken to bring routes that would be added to the system into compliance with S&amp;Gs.</p>
<p>Riparian Conservation Objective #5: Preserve, restore, or enhance special aquatic features, such as meadows, lakes, ponds, bogs, fens, and wetlands, to provide the ecological conditions needed to recover or enhance the viability of species that rely on these areas.</p>					
<p>117. Assess the hydrologic function of meadow habitats and other special aquatic features during range management analysis. Ensure that the characteristics of special aquatic features are, at a minimum, at Proper Functioning Condition, as defined in the appropriate</p>	<b>Not Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>	<b>Consistent</b>
	<p>Rationale: Allowing cross-country use to continue will perpetuate known existing impacts from motor vehicle use that affect the hydrologic function of meadows and other special aquatic</p>	<p>Rationale: Prohibiting cross-country use will prevent motor vehicle impacts from continuing to affect the function of meadows and other special aquatic features. Areas with known impacts would</p>	<p>Rationale: Prohibiting cross-country use will prevent motor vehicle impacts from continuing to affect the function of meadows and other special aquatic features. The areas with known existing impacts would</p>	<p>Rationale: Prohibiting cross-country use will prevent motor vehicle impacts from continuing to affect the function of meadows and other special aquatic features. Areas with known impacts would recover over</p>	<p>Rationale: Prohibiting cross-country use will prevent motor vehicle impacts from continuing to affect the function of meadows and other special aquatic features. Areas with known impacts would</p>

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Technical Reports (TR-1737-x)	features. In the long-term, these functioning of these features could become more impaired, or additional features could be affected.	recover over time, and no additional features would be affected. None of the routes that would be added to the NFTS affect the functioning condition of any special aquatic feature. Where these routes currently affect water flow paths or impact aquatic / riparian habitat, actions will be taken to restore flow paths and minimize impacts.	recover over time, and no additional features would be affected.	time, and no additional features would be affected. None of the routes that would be added to the NFTS affect the functioning condition of any special aquatic feature. Where these routes currently affect water flow paths or impact aquatic / riparian habitat, actions will be taken to restore flow paths and minimize impacts.	recover over time, and no additional features would be affected. None of the routes that would be added to the NFTS affect the functioning condition of any special aquatic feature. Where these routes currently affect water flow paths or impact aquatic / riparian habitat, actions will be taken to restore flow paths and minimize impacts.
118. Prohibit or mitigate ground-disturbing activities that adversely affect hydrologic processes that maintain water flow, water quality, or water temperature critical to sustaining bog and fen ecosystems and plant species that depend on these ecosystems. During project analysis, survey, map, and develop measures to protect bogs and fens from such activities as trampling by livestock, pack stock, humans, and wheeled vehicles. Criteria for	Not Consistent Rationale: Allowing continued cross-country use would not prohibit or mitigate impacts from unauthorized routes or dispersed motor vehicle use on hydrologic processes. Although it is illegal to cause 'resource damage' with motor vehicle use, users do not recognize subtle impacts to hydrology	Consistent Rationale: Prohibiting cross-country use would prevent subtle impacts on hydrology that could affect fens from becoming more widespread. Existing impacts could diminish over the long-term as the existing unauthorized routes recover. Routes that would be added to the NFTS would be improved to minimize any	Consistent Rationale: Prohibiting cross-country use would prevent subtle impacts on hydrology that could affect fens from becoming more widespread. Existing impacts could diminish over the long-term as the unauthorized routes recover.	Consistent Rationale: Prohibiting cross-country use would prevent subtle impacts on hydrology that could affect fens from becoming more widespread. Existing impacts could diminish over the long-term as the existing unauthorized routes recover. Routes that would be added to the NFTS would be improved to minimize any identified impacts	Consistent Rationale: Prohibiting cross-country use would prevent subtle impacts on hydrology that could affect fens from becoming more widespread. Existing impacts could diminish over the long-term as the existing unauthorized routes recover. Routes that would be added to the NFTS would be improved to minimize any

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<p>determining bogs and fens include, but are not limited to, the presence of: (1) sphagnum moss (Spagnum spp.), (2) mosses belonging to the genus Meesia, and (3) sundew (Drosera spp). Complete initial plant inventories of bogs and fens within active grazing allotments prior to re-issuing permits.</p>	<p>and water quality that could affect fens in the project area as 'resource damage'.</p>	<p>identified impacts to hydrology and to reduce impacts to water quality, even where these impacts are not thought to affect a fen.</p>		<p>to hydrology and to reduce impacts to water quality, even where these impacts are not thought to affect a fen.</p>	<p>identified impacts to hydrology and to reduce impacts to water quality, even where these impacts are not thought to affect a fen.</p>
<p>Riparian Conservation Objective #6: Identify and implement restoration actions to maintain, restore, or enhance water quality and maintain, restore, or enhance habitat for riparian and aquatic species.</p>					
<p>122. Recommend restoration practices in: (1) areas with compaction in excess of soil quality standards, (2) areas with lowered water tables, or (3) areas that are either actively down cutting or that have historic gullies. Identify other management practices, for example, road building, recreational use, grazing, and timber harvests, that may be contributing to the observed degradation.</p>	<p><b>Not Consistent</b></p>	<p><b>Consistent</b></p>	<p><b>Consistent</b></p>	<p><b>Consistent</b></p>	<p><b>Consistent</b></p>
	<p>Rationale: Restoration actions are recommended in the project file. This information can be used to design future projects. However, under this alternative, none would be implemented, therefore water quality and habitat would not be restored. Continuing cross-country use would probably also</p>	<p>Rationale: Restoration actions needed to maintain or restore water quality and/or aquatic/riparian habitat that are related to the routes to be added to the NFTS under this alternative would be implemented. Other restoration recommendations could be used to design future projects, but would not occur under this alternative.</p>	<p>Rationale: Restoration actions are recommended in the project file. This information can be used to design future projects. However, under this alternative, none would be implemented, therefore water quality and habitat would not be restored. Prohibiting cross-country use would maintain water quality and habitat conditions, and the</p>	<p>Rationale: Restoration actions needed to maintain or restore water quality and/or aquatic/riparian habitat that are related to the routes to be added to the NFTS under this alternative would be implemented. Other restoration recommendations could be used to design future projects, but would not occur under this alternative. Prohibiting cross-</p>	<p>Rationale: Restoration actions needed to maintain or restore water quality and/or aquatic/riparian habitat that are related to the routes to be added to the NFTS under this alternative would be implemented. Other restoration recommendations could be used to design future projects, but would not occur under this alternative.</p>

Applicable Standards and Guidelines for RCAs and CARs	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	prevent passive recovery from occurring, and could cause additional impacts that fail to even maintain water quality and habitat conditions.	Prohibiting cross-country use would maintain water quality and habitat conditions, and the passive restoration that would result would provide some additional benefit in the long-term.	passive restoration that would result would provide some additional benefit in the long-term.	country use would maintain water quality and habitat conditions, and the passive restoration that would result would provide some additional benefit in the long-term.	Prohibiting cross-country use would maintain water quality and habitat conditions, and the passive restoration that would result would provide some additional benefit in the long-term.

**Table J- 3. Site-specific Exceptions to Consistency Determinations Described for the Alternatives**

Feature	Alternatives Containing Feature			Standards and Guidelines Not Met	Description of Inconsistency and Recommended Mitigation
	Alt 2	Alt 4	Alt 5		
NFTS road 5S080J, proposed to change from Closed to All Vehicles to Open to All Vehicles	X			92, 100, 102, 116	This feature was evaluated as unauthorized route TH-80 prior to being identified as an existing NFTS road. Numerous impacts to the adjacent stream and meadows were noted, including unstable and eroding stream crossings with sediment delivery from the road. In order to be consistent with S&Gs, the road would require improvements prior to opening it for public motor vehicle use.
NFTS road 9S006, native surface road proposed to remain open year-round	X	X	X	92, 116	Approximately 0.4 miles of this road is located in the RCA of the Jose Basin CAR. This road segment is native surface, and opening it during the wet season increases the risk of road surface deformation, erosion, and sediment delivery to streams that are tributary to Jose Creek. If open year-round, this segment should be graveled in order to comply with BMPs and to protect water quality in the CAR.
JG5		X		100, 118	Deposition from this route poses a threat to fen habitat. Mitigations 'to be determined' are needed to protect the fen prior to this route's addition to the NFTS.
BP133			X	92	This route is located in the RCA, and has no closure period specified to protect against erosion, sediment delivery, and potential impacts to aquatic habitat that could occur during the wet season. This route will be monitored and if such impacts are detected, the addition of a winter season closure may be necessary.

**Table J- 4. Riparian Conservation Objects, 2004 ROD**

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
91. Designate RCA widths as described in Part B of ROD appendix. RCA widths may be adjusted at the project level if a landscape analysis has been completed and a site-specific RCO analysis demonstrates a need for different widths.	X		RCAs have been designated for this project.
92. Evaluate new proposed management activities within CARs and RCAs during environmental analysis to determine consistency with RCOs at the project level and the AMS goals for the landscape. Ensure that appropriate mitigation measures are enacted to: 1) minimize risk of activity-related sediment entering aquatic systems and 2) minimize impacts to habitat for aquatic- or riparian-dependent plant and animal species.	X		The addition of existing unauthorized features to the NFTS is considered to be a 'new activity'. Therefore, this S&G applies.
93. Identify existing uses and activities in CARs and RCAs during landscape analysis. At the time of permit reissuance, evaluate and consider actions needed for consistency with RCOs.		X	This project is not a landscape analysis or a permit reissuance. However, existing uses and activities in CARs and RCAs will be considered in the Detailed CWE assessment.
94. As part of project-level analysis, conduct peer reviews for projects that propose ground-disturbing activities in more than 25% of the RCA or more than 15% of a CAR.		X	None of the alternatives would result in this amount of ground-disturbing activity in an RCA or CAR.
<b>Standards and Guidelines Associated with RCO #1:</b>			
95. For waters designated as "Water Quality Limited" (Clean Water Act Section 303(d)), implement appropriate State mandates for the water body, such as Total Maximum Daily Load (TMDL) protocols.	X		Willow Creek is on the 303(d) list for temperature.
96. Ensure that management activities do not adversely affect water temperatures necessary for local aquatic and riparian-dependent species assemblages.		X	Because vegetation modification will be limited to brushing of trails, it is unlikely that water temperatures will be affected.
97. Limit pesticide applications to cases where project level analysis indicates that pesticide applications are consistent with riparian conservation objectives.		X	None of the alternatives include application of herbicides or pesticides.
98. Within 500 feet of known occupied sites for the California red-legged frog, Cascades frog, Yosemite toad, foothill yellow-legged frog, mountain yellow-legged frog, and northern leopard frog, design pesticide applications to avoid adverse effects to individuals and their habitats.		X	None of the alternatives include application of herbicides or pesticides.

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
99. Prohibit storage of fuels and other toxic materials within RCAs and CARs except at designated administrative sites. Prohibit refueling within RCAs and CARs unless there are no other alternatives. Ensure that spill plans are reviewed and up-to-date.	X		The decision will not authorize the storage of fuels or toxic materials except what may be required while performing work needed prior to adding facilities to the NFTS.
<b>Standards and Guidelines Associated with RCO #2:</b>			
100. Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.	X		This project involves decisions about unauthorized routes and use areas that currently have these impacts to water flow paths.
101. Ensure that culverts or other stream crossings do not create barriers to upstream or downstream passage for aquatic-dependent species. Locate water drafting sites to avoid adverse effects to in stream flows and depletion of pool habitat. Where possible, maintain and restore the timing, variability, and duration of floodplain inundation and water table elevation in meadows, wetlands, and other special aquatic features.	X		This project will result in the installation and / or maintenance of culverts and other stream crossings.
102. Prior to activities that could affect streams, determine if relevant geomorphic characteristics are within the range of natural variability. If characteristics are outside the range of natural variability, implement mitigation measures and short-term restoration actions needed to prevent further declines or that will result in an upward trend.	X		These routes and areas have the potential to affect the geomorphic characteristics of stream channels.
103. Prevent disturbance to meadow-associated streambanks and natural lake and pond shorelines caused by resource activities (for example, livestock, off-highway vehicles, and dispersed recreation) from exceeding 20 percent of stream reach or 20 percent of natural lake and pond shorelines. Disturbance includes bank sloughing, chiseling, trampling, and other means of exposing bare soil or cutting plant roots. This standard does not apply to developed recreation sites and designated off-highway vehicle routes.	X		Designated OHV routes are specifically excluded from this S&G. However, it does apply to Use Areas.
104. In stream reaches occupied by, or identified as "essential habitat" in the conservation assessment for, the Lahontan and Paiute cutthroat trout and the Little Kern golden trout, limit streambank disturbance from livestock to 10 percent of the occupied or "essential habitat" stream reach. (Conservation assessments are described in the record of decision.)		X	This project is not related to livestock management.

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
Cooperate with State and Federal agencies to develop streambank disturbance standards for threatened, endangered, and sensitive species. Use the regional streambank assessment protocol. Implement corrective action where disturbance limits have been exceeded.			
105. At either the landscape or project-scale, determine if the age class, structural diversity, composition, and cover of riparian vegetation are within the range of natural variability for the vegetative community. If conditions are outside the range of natural variability, consider implementing mitigation and/or restoration actions that will result in an upward trend. Actions could include restoration of aspen or other riparian vegetation where conifer encroachment is identified as a problem.	X		At specific locations in the project area, impacts to riparian vegetation do occur. For facilities being considered for addition to the NFTS, site specific actions have been specified that must be completed prior to addition to the NFTS in order to minimize riparian impacts (Appendix B). At the project area scale, because actions resulting in vegetation modification will be limited to brushing of trails, it is unlikely that the project will affect the overall characteristics of any riparian area.
106. Cooperate with Federal, Tribal, State and local governments to secure in stream flows needed to maintain, recover, and restore riparian resources, channel conditions, and aquatic habitat. Maintain in stream flows to protect aquatic systems to which species are uniquely adapted. Minimize the effects of stream diversions or other flow modifications from hydroelectric projects on threatened, endangered, and sensitive species and essential habitat as identified in conservation assessments. (Conservation assessments are described in the record of decision.)		X	None of the alternatives include flow modifications.
107. For exempt hydroelectric facilities on national forest lands, ensure that special use permit language provides adequate in stream flow requirements to maintain, restore, or recover favorable ecological conditions for local riparian- and aquatic-dependent species.		X	None of the alternatives deal with hydroelectric facilities.
<b>Standards and Guidelines Associated with RCO #3:</b>			
108. Determine if the level of coarse large woody debris (CWD) is within the range of natural conditions in terms of frequency and distribution and is sufficient to sustain stream channel physical complexity and stability. If CWD levels are deficient, ensure proposed management activities, when appropriate, contribute to the recruitment of CWD. Burning prescriptions should be designed to retain CWD; however short-term reductions below either the soil quality standards or standards in species management plans		X	Other than clearing down trees that are blocking trails, this project will not result in wood removal. The wood cleared from trails is left on-site, and will have little to no effect on CWD recruitment.

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
may result from prescribed burning within strategically placed treatment areas or the urban wildland intermix zone.			
<b>Standards and Guidelines Associated with RCO #4</b>			
109. Within CARs, in occupied habitat or “essential habitat” as identified in conservation assessments for threatened, endangered, or sensitive species, evaluate the appropriate role, timing, and extent of prescribed fire. Avoid direct lighting within riparian vegetation; prescribed fires may back into riparian vegetation areas. Develop mitigation measures to avoid impacts to these species whenever ground disturbing equipment is used.		X	There is no prescribed fire associated with any alternative.
110. Use screening devices for water drafting pumps. (Fire suppression activities are exempt during initial attack.) Use pumps with low entry velocity to minimize removal of aquatic species, including juvenile fish, amphibian egg masses and tadpoles, from aquatic habitats.		X	There will be no water drafting authorized as a result of this EIS. When drafting does occur for roads or other forest projects, standard operating procedures require that the direction in this S&G be implemented.
111. Design prescribed fire treatments to minimize disturbance of ground cover and riparian vegetation in RCAs. In burn plans for project areas that include, or are adjacent to RCAs, identify mitigation measures to minimize the spread of fire into riparian vegetation. In determining which mitigation measures to adopt, weigh the potential harm of mitigation measures, for example fire lines, against the risks and benefits of prescribed fire entering riparian vegetation. Strategies should recognize the role of fire in ecosystem function and identify those instances where fire suppression or fuel management actions could be damaging to habitat or long-term function of the riparian community.		X	There is no prescribed fire associated with any alternative.
112. Post-wildfire management activities in RCAs and CARs should emphasize enhancing native vegetation cover, stabilizing channels by non-structural means, minimizing adverse effects from the existing road network, and carrying out activities identified in landscape analyses. Post-wildfire operations shall minimize the exposure of bare soil.	X		This project proposes to add routes to the NFTS that are in the area burned in the Silver Knob fire in 2008.
113. Allow hazard tree removal within RCAs or CARs. Allow mechanical ground disturbing fuels treatments, salvage harvest, or commercial fuel wood cutting within RCAs or CARs when the activity is consistent with RCOs. Utilize low ground pressure equipment, helicopters, over the snow logging, or other non-ground disturbing actions to operate off of existing		X	This project does not include any vegetation management component.

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
roads when needed to achieve RCOs. Ensure that existing roads, landings, and skid trails meet Best Management Practices. Minimize the construction of new skid trails or roads for access into RCAs for fuel treatments, salvage harvest, commercial fuelwood cutting, or hazard tree removal.			
114. As appropriate, assess and document aquatic conditions following the Regional Stream Condition Inventory protocol prior to implementing ground disturbing activities within suitable habitat for California red-legged frog, Cascades frog, Yosemite toad, foothill and mountain yellow-legged frogs, and northern leopard frog.		X	Although this project will designate existing areas and therefore does not authorize 'ground-disturbing activity' in most respects (except for actions required to bring the routes up to standards and maintenance of those facilities), motorized use and designated transportation facilities have the potential to affect aquatic conditions. SCI was not collected for this project, but existing SCI data has been utilized in the analysis.
115. During fire suppression activities, consider impacts to aquatic- and riparian-dependent resources. Where possible, locate incident bases, camps, helibases, staging areas, helispots, and other centers for incident activities outside of RCAs or CARs. During presuppression planning, determine guidelines for suppression activities, including avoidance of potential adverse effects to aquatic- and riparian-dependent species as a goal.		X	This project does not include fire suppression or presuppression planning.
116. Identify roads, trails, OHV trails and staging areas, developed recreation sites, dispersed campgrounds, special use permits, grazing permits, and day use sites during landscape analysis. Identify conditions that degrade water quality or habitat for aquatic and riparian-dependent species. At the project level, evaluate and consider actions to ensure consistency with standards and guidelines or desired conditions.	X		This project proposes to add roads, motorized trails, and staging areas to the NFTS.
<b>Standards and Guidelines Associated with RCO #5:</b>			
117. Assess the hydrologic function of meadow habitats and other special aquatic features during range management analysis. Ensure that characteristics of special features are, at a minimum, at Proper Functioning Condition, as defined in the appropriate Technical Reports: (1) "Process for Assessing PFC" TR 1737-9 (1993), "PFC for Lotic Areas" USDI TR 1737-15 (1998) or (2) "PFC for Lentic Riparian-Wetland Areas" USDI TR 1737-11	X		Although this is not a range management analysis, the role of the PFC assessment in attaining RCO #5 does apply, and PFC can be affected by the motorized access being analyzed in the alternatives.

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
(1994).			
118. Prohibit or mitigate ground-disturbing activities that adversely affect hydrologic processes that maintain water flow, water quality, or water temperature critical to sustaining bog and fen ecosystems and plant species that depend on these ecosystems. During project analysis, survey, map, and develop measures to protect bogs and fens from such activities as trampling by livestock, pack stock, humans, and wheeled vehicles. Criteria for defining bogs and fens include, but are not limited to, presence of: (1) sphagnum moss ( <i>Spagnum</i> spp.), (2) mosses belonging to the genus <i>Meessia</i> , and (3) sundew ( <i>Drosera</i> spp.) Complete initial plant inventories of bogs and fens within active grazing allotments prior to re-issuing permits.	X		The unauthorized routes being considered for addition to the NFTS have the potential to affect these hydrologic processes.
119. Locate new facilities for gathering livestock and pack stock outside of meadows and riparian conservation areas. During landscape analysis, evaluate and consider relocating existing livestock facilities outside of meadows and riparian areas (RCA42). Prior to re-issuing grazing permits, assess the compatibility of livestock management facilities located in riparian conservation areas with riparian conservation objectives.		X	None of the alternatives include new livestock gathering facilities or grazing permits.
120. Under season-long grazing: § For meadows in early seral status: limit livestock utilization of grass and grass-like plants to 30 percent (or minimum 6-inch stubble height) § For meadows in late seral status: limit livestock utilization of grass and grass-like plants to a maximum of 40 percent (or minimum 4-inch stubble height). Determine ecological status on all key areas monitored for grazing utilization prior to establishing utilization levels. Use Regional ecological scorecards and range plant list in regional range handbooks to determine ecological status. Analyze meadow ecological status every 3 to 5 years. If meadow ecological status is determined to be moving in a downward trend, modify or suspend grazing. Include ecological status data in a spatially explicit Geographical Information System database. Under intensive		X	None of the alternatives include any livestock grazing.
grazing systems (such as rest-rotation and deferred rotation) where meadows are receiving a period of rest, utilization levels can be higher than the levels described above if the meadow is maintained in late seral status and meadow-associated species are not being impacted. Degraded meadows (such as those in early seral status with greater than 10 percent			

Standards and Guidelines for RCAs and CARs	Does It Apply ?		Why or Why Not?
	YES	NO	
of the meadow area in bare soil and active erosion) require total rest from grazing until they have recovered and have moved to mid- or late seral status.			
121. Limit browsing to no more than 20 percent of the annual leader growth of mature riparian shrubs and no more than 20 percent of individual seedlings. Remove livestock from any area of an allotment when browsing indicates a change in livestock preference from grazing herbaceous vegetation to browsing woody riparian vegetation.		X	None of the alternatives include any livestock grazing.
<b>Standards and Guidelines Associated with RCO #6:</b>			
122. Recommend and establish priorities for restoration practices in: (1) areas with compaction in excess of soil quality standards, (2) areas with lowered water tables, or (3) areas that are either actively down cutting or that have historic gullies. Identify other management practices, for example, road building, recreational use, grazing, and timber harvests, that may be contributing to the observed degradation.	X		This project will make decisions related to areas with compaction in excess of soil quality standards and areas with active / historic gullies related to recreational use.