



United States Department of Agriculture
Forest Service

Lake Superior Performance Rally Special Use Permit Project Environmental Assessment

Kenton, Ontonagon and Watersmeet Ranger Districts, Ottawa National Forest, Gogebic,
Houghton and Ontonagon Counties, Michigan

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Definitions of the terms used in this document as well as a list of acronyms are located in the glossary section of the Ottawa National Forest’s 2006 Land and Resource Management Plan (Forest Plan), which is available upon request. This documentation, along with this project’s Analysis Framework, is also located at the following website: [Ottawa NF Projects](#) (see the Lake Superior Performance Rally Project link within the “Under Analysis” section).

Introduction

The Ottawa National Forest proposes to authorize a 10 year special use permit for use and occupancy of National Forest System lands, specifically access on approximately 63 miles of road. This permit would allow the Sports Car Club of America (SCCA) to hold their annual, Lake Superior Performance Rally (LSPR) on the Ottawa National Forest. This event would enhance the multiple-use, recreational opportunities on the Ottawa. The permit for this project (herein referred to as the Rally) would allow use of federal land in a manner that minimizes adverse effects on desired resource conditions (p. 2-34).

We prepared this environmental assessment (EA) to determine whether authorization of this special use permit would result in significance as defined by 40 CFR 1508.13 and thereby require the preparation of an environmental impact statement. By preparing this EA, we are fulfilling agency policy and direction to comply with the National Environmental Policy Act (NEPA). For more details of the proposed action, see the Proposed Action and Alternatives section of this document.

This EA is based on the best available information. All information is approximate, and may vary due to site-specific conditions and application of permit stipulations (see Analysis Framework, available on the Ottawa's website and project file). Calculations used for this analysis are based on skilled interpretations of GIS (Geographic Information Systems) and maps; data evaluation; professional judgment from personal observations and previous rally events; and information acquired from review of relevant, scientific literature.

To facilitate the analysis of this project, the Interdisciplinary (ID) Team developed a framework for their analysis with guidance and instruction from the Responsible Official. This analysis framework (see project file) establishes analysis assumptions and defines the depth and detail of analysis necessary to aid the Responsible Official in making findings as presented in the Finding of No Significant Impact. The ID Team developed the analysis framework based on their professional knowledge of expected outcomes and effects, and other legal requirements. This document is available on the Ottawa's website (<http://www.fs.usda.gov>) or is available upon request.

Proposed Project Location

The project area is located on the Kenton, Ontonagon, and Watersmeet Ranger Districts, in Gogebic, Houghton and Ontonagon Counties of Michigan. The project area consists of 63 miles of National Forest System (NFS) road that form the Rally route, which traverses Management Areas¹ (MAs) 2.1, 3.1a and 4.1a, all of which support a roaded natural recreational environment (Land and Resource Management Plan [Forest Plan], pp. 3-6, 3-18 and 3-23). All roads are designated open to highway legal vehicle access on the Ottawa's Motor Vehicle Use Map.

¹ The Forest Plan is located on the Ottawa's website at: <http://www.fs.usda.gov/detail/ottawa/landmanagement/planning>.

The proposed route also crosses MA 8.1, a management area emphasizing protection and enhancement of the Wild and Scenic Rivers (WSRs) and their corridors. Specifically, the project area encompasses portions of the corridors for the East Branch Ontonagon WSR that also supports a roaded natural recreation environment and the Middle Branch Ontonagon WSR corridor. The latter is assigned a semi-primitive motorized recreational environment (Forest Plan p. 3-81.4).

Affected Environment

The Rally is a motorized event that, in the past, used National Forest System roads on the Ottawa for a timed race with drivers following pre-designated routes and given a specific time to drive from checkpoint to checkpoint. This event is one of several such rallies across the United States. It has been an annual event on the Ottawa National Forest for over 25 years. The Rally consists of 40-50 drivers, using both domestic and international cars. It draws several hundred participants (drivers and support crews) and up to two thousand spectators.

The Rally is managed by the permit applicant, the Sports Car Club of America, who pays all costs associated with the event, including law enforcement patrols, as well as road maintenance costs before and after the event. The permit applicant also carries liability insurance. Race participants use highway legal vehicles and the course is held on existing Forest and county roads that have been used in past rally events. The Rally has substantial economic importance to the Kenton community. For about 8 hours the evening of the event, up to 2000 people visit Kenton and area businesses.

Need for the Proposal

The purpose of this proposal is to respond to a special use request by the SCCA in a manner that is consistent with Forest Plan direction by:

- Identifying opportunities for the Ottawa to contribute to the social and economic vitality of local communities (Goal 7, p. 2-4).
- Promoting diverse and quality recreation experiences within the capability of sustainable ecosystems, and consistent with the niche of the Ottawa, while minimizing impacts to natural resources (Goal 9, p. 2-4).
- Designing and maintaining a safe, efficient, and effective transportation system that supports both public and administrative uses of National Forest System Lands (Goal 41, p. 2-12).

The need for this project is to enhance multiple-use opportunities on the Ottawa, while providing a safe environment for recreational users and minimizing or eliminating impacts to natural resources. In addition, there is a need to provide a consistent route for this group of recreational users to support the intended motorized use over a 10 year period.

As this event attracts recreational users and spectators into the area, there is also a need to authorize this project to benefit the local economy and remain consistent with Goal 7 of the Forest Plan as outlined above.

After the Rally, there is a need to evaluate and address roads under permit to ensure that road conditions are returned to their original state and/or improved to provide a safe recreational environment.

Public Involvement and Tribal Consultation

The Forest Service consulted with several interested and affected parties, including state, tribal and local agencies during the scoping period. A scoping letter explaining the Proposed Action and permit request, as well as the location and description of the project, was sent to more than 120 parties in May 2014 (see project file). It was also announced through the Ottawa's Schedule of Proposed Actions² and publication of a legal notice in the May 6, 2014's edition of the Ironwood, Michigan *Daily Globe* newspaper.

Tribal Governments

The Forest Service shares in the United States' legal responsibility and treaty obligations to work with federally-recognized Tribes on a government-to-government basis to protect the Tribes' ceded territory rights on lands administered by the Forest Service. The scoping documentation was sent to several Tribes, including local representatives of the Lac Vieux Desert (LVD) Band of Lake Superior Chippewa Indians and Keweenaw Bay Indian Community (KBIC). In addition, consultation with members of both LVD and KBIC Tribes occurred in 2013; no concerns were expressed.

Other Agencies

The scoping letter was also sent to local government agencies for Iron, Gogebic, Houghton and Ontonagon Counties, local township offices, and the Michigan Department of Natural Resources.

Public Comment Review Process

No comments were received during the scoping comment period. Therefore, no issues with the Proposed Action have been identified. No other external concerns were brought forward and therefore, only the Proposed Action and No Action alternatives are analyzed in detail.

Proposed Action and Alternatives

A summary of the expected outcomes from implementation is included in the following sections. These expected outcomes show how the current conditions would be changed in response to implementation of each alternative, and also demonstrates the extent to which each alternative would meet the purpose and need of the proposal.

² The Schedule of Proposed Actions is a report that contains a list of proposed actions that will begin or are currently undergoing environmental analysis and documentation.

The Forest Plan includes direction in the form of forest-wide goals, objectives, standards and guidelines, as well as management area-specific standards and guidelines. The Forest Plan's desired conditions are used as the foundation for how management strives towards achieving, or maintaining, the desired conditions through site-specific projects (Forest Plan, p. 1-10).

Proposed Action

Specifically, the Proposed Action includes approval of the special use permit for use and occupancy of the roads outlined in Table 1. The proposed mileage has been modified since the scoping comment period as outlined in the table below. Primarily, this modification was necessary to clarify that only roads under federal jurisdiction would be authorized for use in this project (See the Alternative Considered, but Eliminated from Detailed Analysis section for more information).

Table 1. Summary of Proposed Rally Route

Forest Road	Scoping Miles	New Mileage	New Mileage/Rationale	Ranger District
1300	13.3	10.2	3.1 mile decrease to remove portion of road under county jurisdiction	Kenton
1320	3.7	3.7	No Change	
1334	2.5	2.5	No Change	
2210	5.3	0.0	Removed road segment because it is all under county jurisdiction	
3500	10.1	9.1	1.0 mile decrease to remove portion of road under county jurisdiction	
3610	3.5	3.8	Data verification revealed need to increase the mileage by 0.3 miles.	
3616	2.0	0.0	Removed road segment because it is all under county jurisdiction	
3630	5.2	5.1	0.1 mile decrease due to data correction	
3660	6.4	0.7	5.7 mile decrease to remove portion of road under county jurisdiction	
4580	5.1	4.4	0.7 mile decrease to remove portion of road under county jurisdiction	
1460	3.8	3.8	No Change	
1470	6.6	6.4	Data verification revealed need to decrease the mileage by 0.2 miles.	
4500	18.2	13.3	4.9 mile decrease to remove portion of road under county jurisdiction	Watersmeet
Total Miles	85.7 Miles	63 Miles	22.7 Miles Removed from Proposal	

The proposal would authorize a special use permit to establish a set of routes for use in the annual Rally sponsored by the Sports Car Club of America. This project would provide an established set of routes that could assist the SCCA in selecting race day

segments for their event. The special use permit would allow use of 63 total miles for this annual event. However, not all road segments may be used each year.

The Rally is a timed event with drivers following pre-designated routes and given a specific time to drive from checkpoint to checkpoint (e.g., stages). The Rally is only conducted only with highway legal vehicles. If the permit is issued, the roads selected for an event would be closed to the public from 6:00 PM the night of the event until 6:00 AM the following morning. Roads selected for use would be well marked to the public prior to the event.

All operations would be limited to the permitted roads. Vehicle line up/parking would occur on the road; no other staging areas would be needed. Vehicle maintenance needs during the Rally would occur off Forest. During the running of the Rally, all roads would be monitored by Forest Service employees for any safety or resource issues. If any situations arise during the event, that stage could be closed.

The special use permit would also include a set of stipulations to be followed to ensure natural resource protection and a safe recreational environment (including barriers) consistent with Forest Plan direction. These stipulations would ensure compliance with all applicable laws and regulations (see project file, Analysis Framework).

Outcomes of Implementing the Proposed Action

This section outlines the outcomes (or results) show how the current project area conditions would be changed in response to implementing the Proposed Action demonstrates how the proposal meets the purpose and need.

Recreation

There would be no change in the type of use these roads receive under the special use permit as these roads are currently driven on by highway legal vehicles. All Forest Plan standards and guidelines, and best management practices, would be followed through the special use permit to maintain the roads in their current conditions. This would ensure that roads continue to provide safe, recreational access that is consistent with the Recreation Opportunity Spectrum (ROS) designations for the roads encompassing the proposed route. The roads proposed for the Rally were in existence, and open to motorized use during the development of the 2007 Wild and Scenic River Comprehensive River Management Plan. Therefore, the type of use proposed is consistent with the ROS classes for the WSR corridors, and no site-specific amendment is warranted.

Public access to developed recreation sites on the roads forming the Rally route would be closed to use by the general public during the 12-hour event. Temporary closure of recreation sites would be announced through signing and press releases as necessary.

The entire Ottawa National Forest is open to dispersed recreational opportunities in a variety of settings. As the Rally is confined to existing roads, there would be no changes to dispersed recreation other than temporary closure of the Rally route to the general public as stated above.

Transportation Management

The Proposed Action includes maintenance on existing roads, as necessary. The actual amount of road maintenance would be based upon site-specific conditions of each road comprising the Rally route after the annual events occur. Road maintenance activities may be required prior to each year's Rally to ensure safe driving conditions. The proposed Rally route has already been assessed by Forest Service staff; it has been determined that the route can sustain the proposed use.

The outcome of the Proposed Action includes road maintenance to retain or improve conditions to a level commensurate with the designated level (e.g., operational maintenance level³ of 2, 3 or 4) of each road to provide safe access. Improvements could include ditching and shaping of roads, installing/repairing culverts, and gravel placement where needed. Implementation of these actions would enhance the roads' standards in a manner consistent with the Forest Plan's direction to "maintain a safe, efficient, and effective transportation system that supports administrative uses of National Forest System Lands" while minimizing resource impacts, such as sedimentation. These improvements would also benefit public access in those areas currently designated for such use.

Road maintenance would be performed by the Forest Service, but paid for by the permittee as part of the requirements of the special use permit.

Local Economy

Spectator sports and activities on the Ottawa National Forest are limited. Race enthusiasts, race participants and their support staff provide an economic boost to the local economy through their patronage of hotels and restaurants. The Rally not only provides a boost to the food and lodging industry in the local area, but other local communities also benefit within the western Upper Peninsula, as only a portion of the Rally is on NFS land.

No Action Alternative

This alternative was developed as required in 40 CFR 1502.14(d) and serves as the baseline for evaluating the Proposed Action. In summary, the No Action alternative does not propose any new activities or changes to existing conditions within the project area. Under this alternative, the Rally would not be held on NFS roads. Other uses of the roads would not change.

Outcomes of Implementing the No Action Alternative

This section outlines the outcomes (or results) show how the current project area conditions would be changed in response to implementing the No Action Alternative and demonstrates how this alternative would not meet the purpose and need.

³ The operational maintenance level (OML) of a road is classified by the existing level of use and maintenance received. The higher the OML number assigned equates to a higher standard of road for highway vehicle travel, such as the width of the road, and providing conditions allowing for increased speed. See pages 13 and 14 of the Forest Plan's glossary for more information.

Recreation

The No Action alternative would not promote diverse and quality recreation experiences outlined in Goal 9 of the Forest Plan. The outcome of this alternative would be less diverse recreational opportunities for participants and spectators as the Rally would not occur on the Ottawa.

Transportation Management

The roads comprising the Rally route would remain unchanged. No road maintenance would take place unless performed under a separate project or through annual routine maintenance activities.

Economics

The Rally would not take place and therefore there would be no opportunity for local businesses to benefit, such as in the food and lodging industries.

Alternative Eliminated from Detailed Analysis

Concerns brought forward during the scoping period led to consideration of one additional alternative by the Responsible Official. An alternative description and the rationale for eliminating this alternative from detailed analysis are outlined below.

Original Proposed Action

The original route proposed by the permittee included 95 miles of road for use in the Rally. An internal concern was raised that approximately 9.3 miles of Forest Road 3610 is under Gogebic County jurisdiction on the Watersmeet Ranger District. The Responsible Official cannot authorize a special use permit for use and occupancy of roads that are not managed by the Ottawa. Given this information, the Responsible Official excluded this portion of Forest Road 3610 from the proposal prior to the scoping letter being mailed to the public.

The information in the scoping letter disclosed that we were considering a permit for use and occupancy on 85.7 miles of road. Further data review revealed that an additional 22.5 miles of road are under County jurisdiction. Therefore, the Responsible Official excluded portions of Forest Roads 1300, 3500, 3660, 4580, and 4500, as well as all of the segments associated with Forest Roads 2210 and 3616. Additionally, minor errors were found in other mileage calculations, resulting in the removal of an additional 0.2 miles from the proposed route.

Environmental Impacts of the Alternatives

This section summarizes the potential impacts of the proposed action and no action alternatives by resource. This chapter describes the unintended environmental consequences (Forest Service Handbook 1909.15 section 12.4) - also referred to as effects or impacts - on the resources within the project area. The resources discussed are those for which effects are expected or known to occur due to the types of activities proposed. Additional effects are discussed in the FONSI section as related to specific legal requirements.

The anticipated effects are based on professional judgment and knowledge about the extent and duration of effects based on our past experience in the planning and implementation of similar types of activities. To understand the contribution of past actions, especially because these roads have been used in similar ways during past rallies, the analysis used the existing conditions as a representation for the impacts of the past (as allowed by the 2005 CEQ Memo, see project file references).

Comparison of Effects by Alternative

The resource effects summaries in the following table are based on the resource effects estimated by the Interdisciplinary (ID) Team for implementation of the proposed alternatives. These conclusions are based on the selected bounds of analysis per resource. The bounds of analysis that define the location and timeframe considered for estimating the outcomes and effects are disclosed in the Analysis Framework document, which is available on the Ottawa’s website, or upon request. Additional information is available in the Finding of No Significant Impact (FONSI) section for those resources where findings are tied to specific laws, regulations and/or policies.

Table 2. Comparison of the Proposed Action and No Action Alternatives

Resource	Summary
Aquatics and Fisheries	<p>Proposed Action: Minimal or negligible effects to water quality would occur. The risk of erosion and sedimentation is expected to be limited in extent during the Rally because vehicle use would only occur on existing roads as required by the special use permit. This risk may increase slightly on lower standard roads (e.g., OML 2), such as Forest Roads 1320 and 1334. These roads are narrower and comprised of a native surface (e.g., no gravel/aggregate); use at higher speeds could temporarily move material to outside of the roadbed. However, any impacts are expected to be short-term as road maintenance would follow each Rally where needed. Road maintenance activities would result in beneficial conditions for water quality and aquatic habitat in the future due to a reduction in erosion and sedimentation as well as improved road drainage.</p>
	<p>No Action: No direct or indirect effects are expected because no additional road surface disturbing activities would occur.</p>
Non-Native Invasive Plants (NNIP)	<p>Proposed Action: The potential for spread of NNIP via race cars is low, similar to the potential for any other Forest visitor’s car in late fall, that stays mainly on the non-vegetated part of the road. No NNIP species not already occurring in the project area are likely to establish due to the Rally, since the stipulations include measures to clean cars entering the Forest. Slight spread of infestations along roads where they already exist is possible (although it may not be attributable to vehicle use of roads since spread also occurs from natural processes). Slight spread is also possible from road grading that may be needed after the Rally. However, these minor effects are also likely to occur due to general Forest use and are not exacerbated by the event.</p>

Resource	Summary
	Therefore, the effects of running the Rally on NNIP are discountable.
	No Action: No direct or indirect effects are expected because no ground disturbing activities would occur. Existing roadside infestations such as spotted knapweed, marsh thistle, and crown vetch, common in the project area, are expected to persist and may slowly spread, into sunny disturbed areas where the existing native plant community does not repel these invaders. Other NNIP could establish in the project area, spread by wind, water, animals, or human activities.
Soils	Proposed Action: No direct or indirect effects would occur from authorizing the special use permit. The roads comprising the routes and their associated rights-of-way are not considered part of the soil resource. Indirect, beneficial effects from road maintenance would occur since these activities reduce erosion and sedimentation risk.
	No Action: No direct or indirect effects are expected because no activities would occur.

Finding of No Significant Impact

As the Responsible Official, I am responsible for evaluating the effects of the project relative to the definition of significance established by the CEQ Regulations (40 CFR 1508.13). I have reviewed and considered the EA and documentation included in the project file, and I have determined that the Proposed Action alternative will not have a significant effect. As a result, no environmental impact statement will be prepared. My rationale for this finding is as follows, organized by sub-section of the CEQ definition of significance cited above.

Context

For the Proposed Action and No Action alternatives, the context of the environmental effects is based on the environmental analysis in this EA.

In the case of site-specific actions, significance depends on the effects in the project's locale rather than the world as a whole. Both short and long-term effects are relevant (FSH 1909.15, 65.1, Part 02). This project is a site-specific action that by itself does not have international, national, region-wide, or state-wide importance. The outcomes and effects sections reveal that most of the consequences from project implementation and additional environmental effects are confined to the project area. Therefore, it is my determination that the effects of implementing the proposed alternatives would not be significant locally, regionally, or nationally.

Discussion of the significance criteria that follows applies to the intended action and is within the context of local importance in the area associated with the project area.

Intensity

Intensity is a measure of the severity, extent, or quantity of effects, and is based on information from the effects analysis of this EA and the references in the project file. The effects of this project have been appropriately and thoroughly considered through the analysis. The agency has taken a hard look at the environmental effects using relevant scientific information, experience with similar projects, and knowledge of conditions obtained through database information and GIS analysis. My finding of no significant impact is based on the context of the project and intensity of effects using the ten factors identified in 40 CFR 1508.27(b).

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Benefits include, but are not limited to, providing multiple use of the Ottawa through authorizing special use of federal lands where desired resource conditions can be maintained. Additional benefits include road maintenance activities to retain conditions that provide access for administrative and public uses.

The project area includes poor quality habitat for wildlife; this habitat would remain under the Proposed Action. Potential effects to rare species are discussed in the biological evaluation (BE). The BE includes determinations of ‘no effect for Kirtland’s warbler and Canada lynx, and “not likely to jeopardize continued existence or adversely modify proposed critical habitat” for the northern long-eared bat. A “may impact individuals but is not likely to cause a trend to federal listing or loss of viability” determination was made for the gray wolf. All other RFS species received a “no impacts” determination for the Proposed Action.

These potential impacts are similar to other projects previous to this one and are not unique to this project. Most impacts would be minimized and/or avoided using the stipulations associated with the special use permit. Design criteria similar to these stipulations that have been used in previous projects with similar activities have been found to be effective in avoiding or minimizing adverse effects.

In consideration of the outcomes and effects disclosed in this EA as well as the project file, I have evaluated both the beneficial and negative impacts disclosed. I have determined that these impacts are not significant. These impacts would be within the range of effects identified in the Forest Plan’s Final Environmental Impact Statement (USDA Forest Service 2006a, Volume I, pp. 3-1 to 3-228).

2. The degree to which the proposed action affects public health or safety.

The Proposed Action would not significantly affect public health and safety. Motorized use of these roads, including maintenance activities, is a common activity; local residents and seasonal visitors are accustomed to seeing use of these roads, as well as the annual rallies.

During the event, roads designated for use would be signed and posted to alert the public. Additionally, these roads would be closed to passenger vehicle and OHV traffic during

the Rally to address dual-use safety concerns (see the Proposed Action). Based on past events of a similar nature, there have been no instances where public safety has been affected. Therefore, I have determined that implementation of the Proposed Action would have no adverse effects on public health and safety.

3. Unique characteristics of the geographic area such as the proximity to historical or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The project area, and proposed activity, is confined to the roads comprising the route. Therefore, there are no park lands, prime farmlands, wetlands, or ecologically critical areas that would be affected.

National Historic Preservation Act

No direct, indirect or cumulative effects are expected from project implementation. There are no historical or cultural resources in the project area. All sites would be avoided since activities would be confined to the existing roadbeds as outlined in the special use permit. If new sites are found during project implementation, the project would be redesigned to avoid the site, or measures would be designed to mitigate the effects of the project on the site and submitted to the Michigan State Historic Preservation Officer as required by law for their review and consultation. Based upon the results of the analysis performed, the Proposed Action has been determined to be consistent with the National Historic Preservation Act.

Wild and Scenic Rivers Act

This project proposes use of portions of Forest Roads 3500 and 4500, which are located within the Wild and Scenic River corridor for the East Branch Ontonagon River and Middle Branch Ontonagon River, respectively. The portion of Forest Road 3500 comprising the proposed route crosses the East Branch Ontonagon WSR, whereas the portion of Forest Road 4500 is located within the corridor, but does not cross the Middle Branch Ontonagon. As these roads currently exist, and are open to motorized access, there would be no additional impacts that have not already been addressed by the Forest Plan, and WSR Comprehensive River Management Plan (see project file). The Proposed Action would not negatively impact the water quality, free-flowing condition or outstandingly remarkable values of these WSRs.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The Proposed Action is similar in type and intensity to activities that have previously occurred in the past (see project file references). No comments were received in response to the project's proposal. I interpret controversy criteria in a FONSI to be the degree to which there is scientific controversy relative to the results of the effects analysis, not whether one favors or opposes a specific alternative. In reviewing the analysis performed, I have concluded that no points of scientific controversy exist. Based upon previous implementation of the Rally, the effects of the proposed actions on the quality of the human environment are not considered as highly controversial.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The human environment is the natural and physical environment, and the relationship of people with that environment (40 CFR 1508.14). This Proposed Action is similar to other rallies held in the analysis area and other roads on the Ottawa, and its effects upon the human environment are reasonably expected to be similar (see project file references). The project file demonstrates a thorough review of the best available and relevant scientific information, consideration of opposing views, and, where appropriate, the acknowledgment of incomplete or unavailable information, scientific uncertainty, and risk. We have considerable experience with the types of activities being implemented. Road maintenance actions proposed are similar to the types of activities that have been used for many years on the Ottawa. Based upon my knowledge of past actions and professional and technical knowledge and experience, I am confident that we understand the effects of these activities on the human environment. There are no unique or unusual characteristics about the area or Proposed Action that would lead to an unknown risk to the human environment.

6. The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration.

As previously stated, the Proposed Action includes activities that are similar to past rallies and road maintenance actions in this analysis area and across the Ottawa. Therefore, the effects are expected to be similar. The effects analysis is site-specific to the project area and is consistent with the Forest Plan. Therefore, no precedent-setting actions are proposed.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

A cumulative effect is defined as an impact on the affected environment resulting from the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions (40 CFR 1508.25). In order to have a cumulative effect, the effects of combined activities must occur within the same bounds of analysis; that is, the same timeframe and same location (Forest Service Handbook 1909.15, Chapter 15.3).

The cumulative effects of past, present and reasonably foreseeable future actions, in addition to the current proposal, are summarized below. These analyses were reviewed in consideration of the 2005 Council on Environmental Quality (CEQ) guidance on cumulative effects analysis (see project file). In addition the analysis reviewed private land management activities and considered them in the cumulative effects analysis.

The effects of the Proposed Action, when considered in conjunction with other activities (see Table 3), are not expected to lead to significant cumulative effects due to timeframes for implementation, protective measures developed in the stipulations, and application of forest-wide Standards and Guidelines.

Table 3. Summary of Cumulative Effects

Past and/or Present Actions	Findings
Authorization of special use permits for previous rallies	<p>No cumulative effects.</p> <p>All permits are expired. Although the Proposed Action includes use of the same road locations in some instances; there is no overlap in the effects of this use in the same timeframe.</p>
Road Maintenance	<p>Overall, minor beneficial, cumulative effects.</p> <p>2001 Plantation Lakes Project (USDA Forest Service 2001): Road maintenance associated with Forest Roads 1300, 1320 and 1334 under the Plantation Lakes Project is completed. Thus, there would be no overlap of the road maintenance activities associated with the 2014 Rally or future rallies. However, given these past maintenance activities, there may be a reduced need for road maintenance before the 2014 Rally.</p> <p>2005/2006 Bluff Divide Project (USDA Forest Service 2005c and USDA Forest Service 2006c), 2013 Eastern OHV Connector Route (USDA Forest Service 2012), and 2005/2006 Three Corners Project (USDA Forest Service 2005d and USDA Forest Service 2006d): Road maintenance associated with Forest Roads 1300 and 3500 (implemented under the Eastern OHV Connector Route Project), Forest Road 4500 (implemented through the Bluff Divide and Three Corners Projects) and Forest Road 4580 (Bluff Divide Project) have been completed in the past, and activities would continue throughout the next 10 years as determined to be needed under these project decisions (see project file).</p> <p>Due to the on-going road maintenance, there may be a reduced need for maintenance before the 2014 Rally, and before/after subsequent rallies depending on which roads require maintenance for timber sale implementation and which segments of the permitted roads are selected by the permittee.</p> <p>In summary, the road maintenance actions that have occurred in the past, or are currently taking place, in addition to the activities proposed, would result in a beneficial cumulative effect in road, and road-related habitat conditions. This is especially important for soil and water resources, as the roads would be continually addressed to correct problem areas, and reduce the risk of erosion and subsequent sedimentation.</p>

Past and/or Present Actions	Findings
Designated Motorized Use	<p>No cumulative effects.</p> <p>All roads are currently open to motorized use. The Eastern OHV Connector Route Project (USDA Forest Service 2012) authorized designation of OHV use on several Forest Service roads, including Forest Roads 1300 and 3500. Although portions of these roads are identified as part of the project area, the Proposed Action would not permanently change designated motorized use. The scope of the Proposed Action does not include OHV access. The Rally route would be closed to all public access during the event to ensure safety for all users.</p>
Reasonably Foreseeable Future Actions	Findings
Road Maintenance	<p>Overall minor beneficial, cumulative effects.</p> <p>2013 Aquatic Organism Passage (AOP) Project (USDA Forest Service 2013): This project’s Decision has been authorized, but implementation has not yet started. The Decision will restore up to 21 crossings by replacing impaired culverts with appropriately designed structures to allow for fish and other aquatic organism passage and achieve other objectives. One of these crossings is located where Forest Road 2210 intersects with Sidnaw Creek.</p> <p>It is unknown at this time whether this crossing will be repaired during the timeframe of the permit. As outlined in Table 2, road maintenance would benefit soil and aquatic resources. There would be a positive cumulative effect of improved water quality if the AOP project and road maintenance occurred on Forest Road 2210 within the next 10 years of the special use permit.</p> <p>Proposed 2014 Red Pine Thinning Project (USDA Forest Service 2014): If approved, this project would include road maintenance as determined needed based on existing road conditions at the time of red pine plantation harvest. The cumulative effects would be expected to be the same as described under the past and/or present actions section above.</p> <p>Proposed 2014 Aspen Management Project (USDA Forest Service 2014): If approved, this project would include road maintenance as determined needed based on existing road conditions at the time of aspen harvest. The cumulative effects would be expected to be the same as described under the past and/or present actions section above.</p>

Reasonably Foreseeable Future Actions	Findings
County Road Maintenance	<p>Overall minor beneficial, cumulative effects.</p> <p>The permittee would be using several roads under county jurisdiction. Although this road use is not part of the Proposed Action, any road maintenance performed by the counties would have a beneficial cumulative effect as described in the past and/or present section above. This effect, when taking into consideration the maintenance activities proposed on roads under federal jurisdiction, would result in a beneficial cumulative effect for water quality.</p>
2005 Non-native Invasive Plant Control Project	<p>Overall minor beneficial, cumulative effects.</p> <p>This Decision allows control of NNIP infestations (USDA Forest Service 2005b). Use of this tool in addition to the permit stipulations would help reduce the spread of invasives, including NNIP, along the Rally route.</p>

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

This project would meet federal, state and local laws for protection of historic places. There are no known sites or objects eligible for listing, and therefore, no loss or destruction of significant scientific, cultural or historical resources would occur if the Proposed Action is implemented.

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

The Proposed Action would not adversely affect any proposed, endangered or threatened species or its habitat. The BE determined that there would be no effect to Kirtland's warbler or Canada lynx. There is no indication that implementing the Proposed Action would move a proposed, threatened or endangered species towards federal listing or increase its present federal listing (see findings required by NFMA under Intensity Factor #10 below, and project file, Biological Evaluation). If any federally proposed or listed animal or plant species is found at a later date or, if any new information relevant to potential effects of an activity on these species becomes available, the activity would be stopped and the Section 7 consultation process, as per the Endangered Species Act of 1973, as amended, would be initiated.

On October 2, 2013, the USDI Fish and Wildlife Service proposed to list the northern long-eared bat (*Myotis septentrionalis*) as Endangered under the Endangered Species Act due to the primary threat of White-Nose Syndrome (WNS) (USDI Fish and Wildlife Service 2013). More information about this proposed listing is available at the Federal

Register website (<http://www.federalregister.gov>; October 2, 2013 edition, pp. 61045-61080). None of the actions in this project would jeopardize this bat species or its habitat. If the USDI Fish and Wildlife Service lists this bat species (decision expected during the fall 2014), the Ottawa would initiate consultation according to the ESA Section 7 Handbook (USDI Fish and Wildlife Service 1998).

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

The Proposed Action is consistent with the Forest Plan. Actions proposed would not threaten a violation of federal, state, or local environmental protection laws. Stipulations of the special use permit would assure compliance with these laws. Documentation associated with this project does meet National Environmental Policy Act disclosure requirements.

Numerous laws, regulations and agency directives require that this project be consistent with their provisions. I have determined that this project is consistent with all laws and regulations. The following summarizes findings required by major environmental laws.

Clean Water Act

The integrity of project area's water and riparian features would be maintained as a result of the application of general Forest Plan Standards and Guidelines (pages 2-2 to 2-9), and Michigan's Best Management Practices. The EA's analysis indicates that implementation of the Proposed Action would not produce appreciable impacts on aquatics. Therefore, the Clean Water Act and State Water Quality Standards would be met.

Environmental Justice - Executive Order 12898

This Executive Order requires consideration of whether projects would disproportionately impact minority or low-income populations. Public involvement occurred for this project, and the results did not identify any adversely impacted local minority or low-income populations. I have considered the effects of this project on low income and minority populations and concluded that this project is consistent with the intent of this Executive Order. The local community was notified of this project through the public participation process (see project file).

National Forest Management Act (NFMA 16 USC 1600 ET SEQ.)

This Act requires that several specific findings be documented at the project level. These include the following:

1. Consistency with the Forest Plan (16 USC 1604[i]): The Proposed Action would implement the direction of the Forest Plan. In addition, the effects analysis and project record demonstrates the project is consistent with Forest Plan standards and guidelines. I have determined the actions are appropriate and needed to further the desired conditions for special use management. As required by NFMA, I find this project to be consistent with the Forest Plan.
2. Federal law and direction applicable to Regional Forester's Sensitive Species (RFSS) include the National Forest Management Act and the Forest Service Manual 2670.

This section provides a summary of the BE's findings for RFSS (see Table 4 below). "Sensitive" species include "those plant and animal species identified by a Regional Forester for which population viability is of a concern (Forest Service Manual [FSM] 2670.5). The intent is to ensure that species do not become threatened or endangered because of Forest Service actions (FSM 2670.22), and to help maintain a diversity of plant and animal communities on the National Forests (National Forest Management Act 1976).

Biological Evaluations must arrive at one of the four possible determinations: 1) "no impacts" where no effect is expected); 2) "beneficial effects" where effects are expected to be beneficial); 3) "may impact individuals but is not likely to cause a trend to federal listing or loss of viability" where effects are expected to be insignificant [e.g. unmeasurable], or discountable [e.g., extremely unlikely]); and 4) "likely to result in a trend to federal listing or loss of viability", (LRT; where effects are expected to be detrimental and substantial). There are no LRT determinations for this project. The following is a summary of the findings; see the project file for more information.

Table 4. Biological Evaluation Determinations

Resource	Proposed Action	No Action
Plants	All species received a "no impact" determination	All species received a "no impact" determination
Fish and Aquatic Invertebrates	All species received a "no impact" determination	All species received a "no impact" determination
Wildlife	All species received a "no impact" determination except the gray wolf, which received a "may impact individuals (MII) but is not likely to cause a trend to federal listing or loss of viability"	All species received a "no impact" determination

I have reviewed the analysis and projected effects on all RFSS plant and animal species listed as occurring or possibly occurring on the Ottawa. There is no indication that implementing the Proposed Action would cause effects different than those disclosed in the BE. I concur with the findings and determinations outlined above.

Conclusions

The effects analysis considered both the context and intensity of the action in determining its significance as outlined in 40 CFR 1508.27. Based upon the analysis, I have determined that the Proposed Action would not significantly affect the natural and physical environment, and the relationship of people with that environment (40 CFR 1508.14). Therefore, preparation of an Environmental Impact Statement is not required. My review of the analysis prepared by the ID Team indicates that this project is consistent with Forest Plan management direction and compliant with other applicable

laws. The site-specific actions of the Proposed Action, in both the short and long-term, would not be significant.

References

- Council on Environmental Quality. 2005a. Guidance on the consideration of past actions in cumulative effects analysis. Memorandum. Executive Office of the President. Washington D.C.
- USDA Forest Service Manual 2670. Available online at <http://www.fs.fed.us/im/directives/>
- USDA Forest Service. 2001. Ottawa National Forest Record of Decision for the Plantation Lakes Project. Ironwood, MI: USDA Forest Service.
- USDA Forest Service. 2005b. Ottawa National Forest Non-Native Invasive Plant Control Project. Decision Notice and Finding of No Significant Impact. Ironwood, Michigan.
- USDA Forest Service. 2005c. Ottawa National Forest Decision Notice and Finding of No Significant Impact for the Bluff Divide Project I. Ironwood, MI: USDA Forest Service.
- USDA Forest Service. 2005d. Ottawa National Forest Decision Notice and Finding of No Significant Impact for the Three Corners Project I. Ironwood, MI: USDA Forest Service.
- USDA Forest Service. 2006a. Final Environmental Impact Statement for the 2006 Ottawa National Forest Land and Resource Management Plan. Volume I. USDA Forest Service Eastern Region. pp. 3-8 to 3-12; 3-85, 3-86 to 3-97; and 3-198 to 3-224.
- USDA Forest Service. 2006b. Land and Resource Management Plan (referred to as Forest Plan in the body of the document). USDA Forest Service Eastern Region. pp. 1-4, 1-10, 2-2 to 2-9; 2-11, 2-12, 2-21, 3-21, 3-23, 3-27, 3-29; Appendices B, D and F. USDA Forest Service. 2006.
- USDA Forest Service. 2006c. Ottawa National Forest Decision Notice and Finding of No Significant Impact for the Bluff Divide Project II. Ironwood, MI: USDA Forest Service.
- USDA Forest Service. 2006d. Ottawa National Forest Decision Notice and Finding of No Significant Impact for the Three Corners Project II. Ironwood, MI: USDA Forest Service.
- USDA Forest Service. 2012. Ottawa National Forest Decision Notice and Finding of No Significant Impact for the Eastern Off-Highway Vehicle Connector Route Project. Ironwood, MI: USDA Forest Service.
- USDA Forest Service. 2013 Aquatic Organism Passage Decision Memo. Ironwood, MI. USDA Forest Service.
- USDA Forest Service. 2014 Red Pine Thinning Project Environmental Assessment. Ironwood, MI. USDA Forest Service.

USDA Forest Service. 2014 Aspen Management Project Scoping Letter. Ironwood, MI.
USDA Forest Service.

USDI Fish and Wildlife Service. 1998. Endangered Species Consultation Handbook:
Procedures for Conducting Consultation and Conference Activities Under Section
7 of the Endangered Species Act. US Fish and Wildlife Service and National
Marine Service. March 1998 Final. 315 pp.

USDI Fish and Wildlife Service 2013. Endangered and Threatened Wildlife and Plants;
12-month finding on a petition to list the eastern small-footed bat and the
northern-long eared bat as endangered or threatened species; Listing northern
long-eared bat as an endangered species. Federal Register 78 (191): 61046-61020.

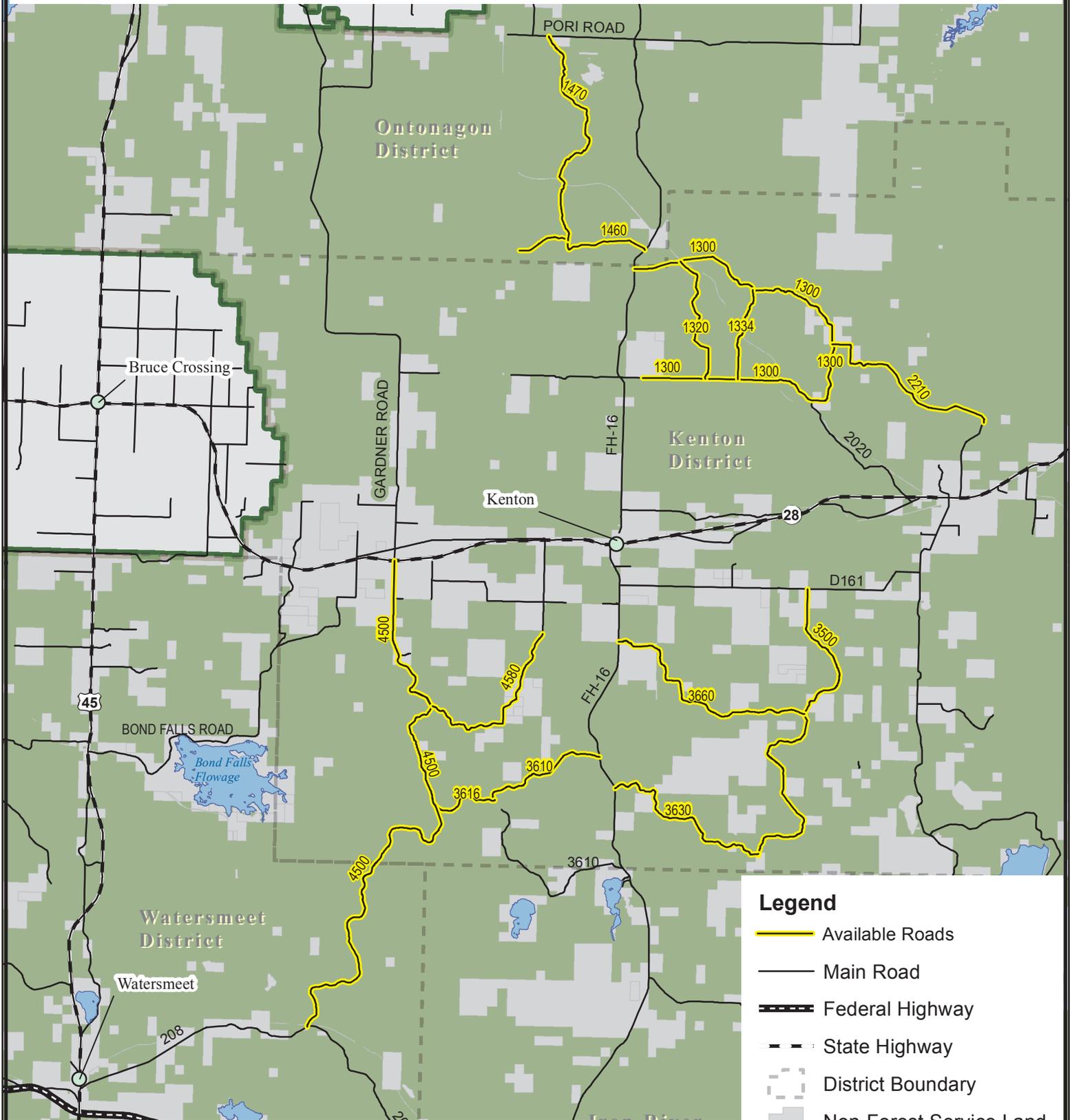
Appendix 1. Map



Lake Superior Performance Rally

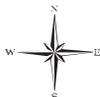
Available Roads

Kenton, Ontonagon and Watersmeet Ranger Districts



Legend

- Available Roads
- Main Road
- Federal Highway
- State Highway
- District Boundary
- Non-Forest Service Land
- Forest Service Land
- Forest Boundary



0 1 2 4 Miles

Compiled by the Ottawa NF using the most current and complete GIS data available. The GIS data displayed is intended for this project. Using the data other than for what it was created may yield inaccurate or misleading results.