APPENDIX I

CONSIDERATION OF OREGON WILD'S MAP

APPENDIX I

Consideration of Roadless Map Submitted By Oregon Wild

This appendix displays how the Forest Service considered the polygon submitted as roadless by Oregon Wild. This appendix compares Oregon Wild's polygon with Forest Service polygons of inventoried roadless areas (IRAs), potential wilderness areas (PWAs), other undeveloped lands, forest roads, past harvest, and other relevant information. Environmental effects to the polygons on Oregon Wild's map can be derived using narratives, maps, and tables in Appendix I, Appendix H, and Chapter 3 of the EIS.

BACKGROUND:

Oregon Wild submitted written comments (project file) about the 'roadless issue' in response to our scoping letter on the South George project. Their letter included a map with a polygon they presented as roadless using inventory criteria and methods they developed for their purposes. Oregon Wild asked the Forest Service to consider the effects to roadless areas and roadless values within the polygon they inventoried and submitted as roadless. They named their polygon "South Fork Asotin Creek roadless area."

The Oregon Wild map and comment letter describe their polygon using many different terms including, but not limited to, inventoried roadless areas, roadless, unroaded, and un-inventoried roadless. Portions of the polygon submitted do not coincide with polygons on Forest Service maps (Appendix H – Map H-4). Oregon Wild did not provide the Forest Service with inventory criteria they used to develop their map submitted during public comment.

Confusion surrounds this issue because there are conflicts between Forest Service maps and the map presented by Oregon Wild. Each map has its own history of genesis; these maps appear to use similar terms with different definitions; use different terms altogether; and, based on different map products, and appear to have different methodology and criteria used to inventory the land. Confusion continues when Oregon Wild asked the Forest Service to disclose impacts to roadless areas and roadless values on lands the Forest Service determined do not meet agency inventory criteria.

In a related example, this EIS discloses impacts to a number of resources sensitive to the construction of temporary forest roads or from our system of existing roads. A road is defined and criteria and methods for inventorying a road conform to agency policy. Definitions and inventory criteria do not change project to project, Forest to Forest; they are common agency-wide. It would not be reasonable for a single individual or group to assert their own definition of a road or how to inventory a road system and then ask the Forest Service to disclose the impacts of 'their road system' on resources present such as elk habitat, fish habitat, or potential wilderness areas. Further, it is unreasonable to consider one version of inventoried forest roads to analyze impacts to elk and fish habitat and then apply a second, different version of roads in another analysis (PWA, undeveloped lands) within the same EIS. Inventories of resources and facilities in support of the South George project have been predicated on agency policy and procedures.

These situations described above confound our ability to conduct a clear and meaningful effects analysis for this topic in South George project planning area.

To resolve this confusion the Forest Service uses its discretion to rely on agency policy, agency definitions of terms, and agency procedures for the inventory of resources and facilities. Inventory criteria and procedures for potential wilderness areas are found in Forest Service Handbook 1909.12, Chapter 71. Definitions and criteria used by the Umatilla National Forest to inventory potential wilderness areas are used by other national forests across the county. The application of these procedures to South George project planning is found in Appendix H of this EIS. Environmental effects to inventoried roadless areas (IRAs), potential wilderness areas (PWAs), and other undeveloped lands were based on maps and polygons created using agency inventory procedures (Appendix H) and are considered and disclosed in Chapter 3 of this EIS in the section titled Inventoried Roadless Areas, Potential Wilderness Areas, and Other Undeveloped Lands.

Methodology and Discussion:

The following narrative describes how Oregon Wild's map and identified polygon (see below) was considered in the South George EIS NEPA process. OW refers to Oregon Wild.

1. Oregon Wild's polygon was digitized from the paper map provided.

   Oregon Wild submitted a map (Figure I-1) with an approximately 3,970-acre polygon called South Fork Asotin Creek roadless area located within South George project planning area.

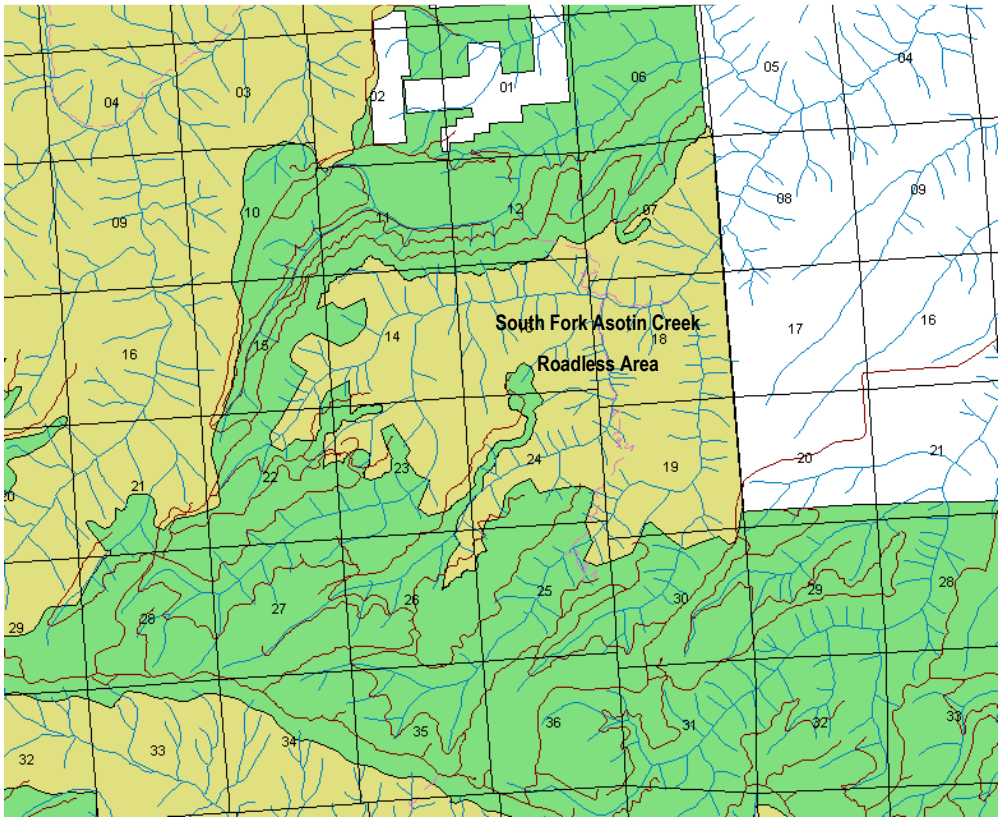

Figure I-1 Map submitted by Oregon Wild in their letter dated April 1, 2009.

Table I-1 displays the acres of Oregon Wild's polygon and Forest Service potential wilderness areas (PWAs) and other undeveloped lands in comparison to Forest Service lands and Forest Plan management area allocations. (There are no Bureau of Land Management (BLM) or privately owned lands within or adjacent to South George project planning area).

Table I-1 Comparison of Oregon Wild's polygon and Forest Service inventory of PWAs, Other Undeveloped Lands and Forest Plan Management Area Allocations within South George Project Planning Area

	Ownership	Forest Plan Management Area Allocations (acres)					
	ForestService (acres)	A6	C1	C3	C3A	C4	C5
Oregon Wild's Polygon	3,970	0	506	106	751	2,324	284
Forest Service Inventoried PWAs	0	0	0	0	0	0	0
Forest Service, Other Undeveloped Lands	8,785	1	822	205	1,613	5,379	763

2. Map I-OW-1 was created that compared Oregon Wild's polygon to past harvest, forest roads, IRAs and PWAs.

   Acres with past timber harvest stumps and forest roads were dropped from Forest Service inventory and were not carried forward into the PWA and other undeveloped lands maps. Oregon Wild's roadless polygon is larger (more acres) than the Forest Service's polygon of other undeveloped lands because their polygon includes forest roads and past timber harvest as displayed on Map I-OW-1.

3. Map I-OW-2 was created that compared Oregon Wild's polygon to locations of other undeveloped lands, IRAs, PWAs, and forest roads.

   Table I-2 displays the acres of overlap of Oregon Wild's polygon with IRAs, PWAs, other undeveloped lands, forest roads and past harvest on National Forest System Lands within the project planning area.

Table I-2 Overlap of Oregon Wild's Polygon with Other Undeveloped Lands, Roads, And Past Harvest (Map I OW-1)

	IRAs and PWAs*	Other Undeveloped Lands* (acres)	Forest Roads within Polygon (miles)	Areas with evidence of stumps and Past Harvest (acres)
Oregon Wild	0	3,485	0	485

* As identified in Appendix H.

The affected environment of other undeveloped lands is disclosed in the EIS, Chapter 3in the section titled Inventoried Roadless Areas, Potential Wilderness Areas, and Other Undeveloped Lands. The affected environment of other undeveloped lands is based on maps and acres described in Chapter 3, and Appendix H.

Descriptions for the affected environment of other undeveloped lands applies to the acres of Oregon Wild's polygon that overlap with other undeveloped lands polygons displayed in Map I-OW-2, and Table I-2.

4. Maps listed below were created that compared Oregon Wild's polygon to the locations of project activities proposed in Alternatives B, C, and D of the South George project.

    a. Map I-OW-Alt B
    b. Map I-OW-Alt C
    c. Map I-OW-Alt D

Table I-3 displays the acres of Oregon Wild's polygon in comparison to the harvest, mechanical fuels treatment, and landscape prescribed fire proposed in Alternatives B, C, and D.

Table I-3 Proposed Activities within Oregon Wild's Polygon by Action Alternative

	Vegetation Removal Harvest (acres)			Natural Fuels Treatment Mechanical Fuels treatment (acres)			Landscape Prescribed Fire (acres)		
	Alt. B	**Alt. C**	**Alt. D**	**Alt. B**	**Alt. C**	**Alt. D**	**Alt. B**	**Alt. C**	**Alt. D**
Oregon Wild	665	665	500	0	0	0	1,415	1,415	1,415

No activities are proposed in Asotin and Wenatchee Creek IRAs/PWAs (Chapter 3, pp. 3-179 to 3-180). There are no direct environmental consequences to IRA/PWAs as there are no IRA/PWAs within the project area. Asotin Creek and Wenatchee Creek IRA/PWAs are separated from the project planning area by main access forest system roads (FRs 4400, 4300, and 4304). Environmental effects to other undeveloped lands are disclosed in the EIS, Chapter 3 in the section titled Inventoried Roadless Areas, Potential Wilderness Areas, and Other Undeveloped Lands. These environmental effects are based, in part, on maps and acres described in Appendix H.

The descriptions of environmental effects to the 'intrinsic physical and social values' of other undeveloped lands applies to the acres of the Oregon Wild's polygon that overlaps with other undeveloped lands polygons displayed in maps I-OW-AltB, I-OW-AltC, I-OW-AltD, , and Table I-2 and I-3. Temporary road construction, timber harvest, natural fuels treatments, and landscape prescribed fire are proposed within other undeveloped lands and environmental effects described in the Chapter 3, pp. 3-183 to 3-186.

5. Lastly, about 485 acres of Oregon Wild's polygon within the South George project planning boundary do not overlap other undeveloped lands. These remaining acres are essentially developed because they contain evidence of stumps along forest roads and evidence of past timber harvest.

Activities in these remaining essentially developed acres of land applies to the acres of the Oregon Wild's polygon that do not overlap with other undeveloped lands polygons as displayed in maps I-OW-AltB, I-OW-AltC, I-OW-AltD. The environmental effects to the remaining essentially developed acres of land are disclosed throughout all other resource sections of Chapter 3.

Attached Maps and Documents

a. Map I-OW-1
b. Map I-OW-2
c. Map I-OW-Alt B
d. Map I-OW-Alt C
e. Map I-OW-Alt D