Begin forwarded message:

From: "Krueger, Joseph -FS" <joseph.krueger@usda.gov>
Subject: email questions from 9/4 re: Alt B road miles
Date: September 9, 2020 at 2:54:25 PM MDT
To: Keith Hammer <keith@swanview.org>

**Cc:** "Helser, Micah - FS" <micah.helser@usda.gov>, "Draggoo, Michele -FS" <michele.draggoo@usda.gov>, "Steele, Kurt -FS" <kurt.steele@usda.gov>

Keith, my responses are in red italicized text.

The Mid-Swan DEIS, at xiv, states of Alt. B:

"Permanent road construction could occur on 38.7 miles (note: this does not include the 7.5 miles of new road construction proposed above) and temporary roads on another 10.6 miles. Seventy-seven percent of these permanent roads would be stored after use, the remaining would be close with a gate." (parenthesis in original)

- 1. Elsewhere in the DEIS and on Slide 34 of the Sept. 2 presentation appear to include the 7.5 miles proposed to rectify road/aquatic problems in the 38.7 miles. Which is it; are those 7.5 miles included or excluded from the Alt. B total of 38.7 miles? That statement in the executive summary at xiv is erroneous. It either should have the note in parenthesis deleted, or the 38.7 number adjusted to the correct number which is 31.1. The data presented in Chapter 2 is correct, and is the data we used for our effects analysis in Chapter 3. DEIS Table 28 shows the correct number (31.1) with the 7.5 miles deducted.
- 2. If 23% of the new roads are only gated, does this not increase TMRD and does that not violate Forest Plan standards to maintain the 2011 Baseline? You need to also account for the substantial changes we're proposing in the existing road system. We are accounting for any new road impacts by storing existing roads in ways that offset impacts. E.g. gated to impassable, decommissioning, and gated to stored.
- 3. Don't the 77% of new roads to be Stored need to also be rendered Impassable to not increase TMRD? TRMD is calculated as the percent of the subunit where the road density within that moving window exceeds 2 miles/square mile. So if we're placing a road in an area that already exceeds that, it may not affect TMRD. If we're placing a road in an area that has <2 miles/sq mile road density, but the new road does not push it over that threshold, it does not affect TMRD. New roads will only affect TMRD if they cause an area to go from below 2 miles/sq mile to above 2 miles/sq mile. Wherever we have that situation, and it can't be mitigated somehow by closing another road segment, we're proposing actions at the road entrance after treatment so it doesn't count against TMRD.

Joe Krueger Team Leader

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