## SBEADMR NEPA Analysis and Checklist Updates – Use of Tethered Cut-to-Length Technology

Per the finding in the attached Supplemental Information Report (SIR), three SBEADMR checklist items will be updated to allow for the use of tethered cut-to-length harvester/forwarder systems in SBEADMR priority treatment areas. Please refer to the SIR for more information on this technology and relevant direction from the SBEADMR FEIS and the GMUG Forest Plan. Following is an explanation of how the original SBEADMR NEPA allows for this checklist change through the annual Management Review process and without additional scoping.

Appendix B of the SBEADMR FEIS notes that, “Design features would be subject to change as a result of 1) change in policy or management direction (e.g. amendments or revision of the Forest Plan, federal listing of a species, etc.) and 2) best available science which indicates design feature should be modified or replaced to improve effectiveness. Potential changes would be evaluated during annual Management Reviews of SBEADMR implementation” (p. B-2). The SBEADMR Record of Decision is explicit that, “The IDT [Interdisciplinary Team] review, combined with monitoring results and Science Team input, will provide feedback to forest managers about how to best design and implement future treatments in the treatment area. The results of this monitoring, in conjunction with best available science, will identify relevant improvements to procedures or exemplary practices to benefit future treatments authorized by the SBEADMR Record of Decision” (p. 6).

The approved checklist changes to allow for the use of tethered cut-to-length technology are within the sideboards of design feature changes as described in Appendix B and the Record of Decision. Furthermore, the changes in design features do not result in a change in management triggers. As such, design feature changes will not result in effects outside of those analyzed in the FEIS. Soil effects were analyzed with 15% of the activity area disturbed as the red light trigger (FEIS Table 6, p. 44). Areas of sensitive soils, including areas with severe and very severe erosion hazard ratings, will still be identified and considered during the pre-treatment checklist phase, with appropriate design features identified as needed (SBEADMR FEIS p. 136).