

Appendix B – Response to Comments

Content Analysis Process

Public responses on the Franklin Basin - Tony Grove Winter Recreation project are documented and analyzed using a process called content analysis. This is a systematic process of compiling and categorizing all public viewpoints and concerns submitted on a project. Content analysis is intended to help the interdisciplinary team clarify or adjust the Environmental Assessment. Information from letters, emails, and faxes, are all included in this analysis. This method is particularly effective in analyzing voluminous comment both individually and collectively, as required by NEPA.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to analysis documents and decisions. Further, because respondents are self-selected, they do not constitute a random or representative public sample. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Every comment and suggestion has value, whether expressed by one respondent or many. All input is read and evaluated and the analysis team attempts to capture all relevant public concerns in the analysis process.

Analysis of Public Comment

In the content analysis process, each response is assigned a unique number. This number allows analysts to link specific comments to original responses. All respondents' names and addresses are entered into a project-specific spreadsheet, enabling creation of a complete list of all respondents.

Analysts read the response and identify stand-alone comments within each letter. Analysts assign each comment to a numerical code that identifies the overall subject area. They use a systematic numerical categorization or “coding” structure that has been specifically tailored to project documents. Each project-specific coding structure is a tool to help sort comments into logical groups by topics. In this case, the coding structure was organized to follow the topic order of the EA and was designed to be inclusive rather than restrictive in order to sufficiently capture all comments. The coding structure and other supporting documentation are available in the administrative record at the Logan District Office in Logan, UT.

After being coded, each response letter's set of coded comments is entered into the project spreadsheet. Spreadsheet reports track all input and allow analysts to identify public concerns and to analyze the relationships among them. While simple statements of opinion without a rationale are captured in the process and entered in the project

spreadsheet, it is the strength of each rationale as a complete argument that provides the interdisciplinary team a comment to consider.

A smaller team then reviews sample entries in the spreadsheet with the actual responses and validates coding and comment statement. “Like” comment statements are consolidated into a comment summary. If a comment statement was unique it is simply brought forward into the comment summary column. Responses are written to the comment summaries.

The content analysis process also identifies all response letters that are submitted as part of an organized response (or “form letter”) campaign and therefore contain identical text. Analysts code a “master” campaign letter and enter comments into the project spreadsheet so that they are considered alongside all non-campaign comments. If a respondent adds original comments to the organized response letter he or she submits, these comments are identified, coded and entered into the spreadsheet.

Comment statement and comment summaries are not intended to replace actual comment letters. Rather, they can help guide the reviewer to comments on the specific topic in which he or she may be interested.

Although the list of comment summaries attempts to capture the full range of public issues and concerns, it should be used with caution. Respondents are self-selected; therefore their comments do not necessarily represent the sentiments of the public as a whole. However, these reports do attempt to provide fair representation of the wide range of views submitted. In considering these views, there is no attempt to treat input as if it were a vote. Instead, the content analysis process ensures that every comment is considered at some point in the decision process.

The comment summaries are not intended to replace the need for interdisciplinary team members and decision-makers to directly review all responses and comments. The content analysis process allows a systematic review of all public responses by subject area. Given the volume of responses received during PEA notice and comment period due in part to the widespread use of email, this process can greatly enhance methodical review of comments and meet our goal of responsiveness to the public.

Response to Comments under the National Environmental Policy Act

Agencies have a responsibility under the National Environmental Policy act (NEPA) to first “assess and consider comments both individually and collectively” and then to “respond... stating its response in the final statement.” The content analysis process used by the U.S. Forest Service, described in the previous section, considers comments received “individually and collectively” and equally, not weighting them by the number received or by organizational affiliation or other status of the respondent. Comment statements created from public input form the basic summary of public comment and were the primary focus of our interdisciplinary team in considering comments.

The NEPA requires that after we consider comments, we formally respond to comments. CEQ regulations at 40 CFR 1503.4 provide five possible responses:

1. Modify alternatives including the proposed action.
2. Develop and evaluate alternatives not previously given serious consideration by the agency.
3. Supplement, improve, or modify its analyses.
4. Make factual corrections.
5. Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

As an example comments that simply state a position in favor of or against an alternative, merely agree or disagree with Forest Service policy, or otherwise express a personal preference or opinion would not warrant agency response. A suggestion to change an alternative would elicit a more extensive response and offer an explanation of why or why not and where the comment may have resulted in changes to the assessment. In addition, public comments that identified editorial or other errors in the presentation of information in the PEA were used to revise text and make corrections for the EA.

Agency Response to Comments

As described in the previous section, each comment summary was derived from one or many individual public comments. Our interdisciplinary team reviewed the actual letters in the preparation of our responses. Interested parties may review the reading file of original response letters on file at the Logan District Office in Logan, UT.

- 1) **Comment:** The Forest Service failed to provide a legitimate and/or sufficient purpose and need for this project.
Response: The Responsible Official defines the purpose and need for site-specific projects. It is based on the current condition of the forest or desired opportunity and what is to be achieved by the project.
- 2) **Comment:** The Forest Service should address skier experience as negatively affected by exhaust, noise, safety, and conflicts.
Response: These issues have been identified and responded to in a variety of ways by each alternative.
- 3) **Comment:** The issue of air quality shouldn't be measured by EPA standards.
Response: Concern was expressed that the issue was not just “air quality” but also includes the “smell of exhaust” as it affects skier experience. The final EA addresses both parts of this issue. Air quality is addressed through a comparison of an air quality study in YNP to amount of snowmobile use in the Tony Grove – Franklin parking areas (similar to a comparison presented in the Revised Forest Plan). These studies appropriately use national ambient air quality standards for maximum

allowable concentrations for criteria pollutants, established by the Clean Air Act and the EPA, for analysis of air quality. The effect of “smell of exhaust” on the non-motorized winter recreation experience was added to the EA (see Section 1.6.1.2).

4) **Comment:** Motorized and non-motorized users should not mingle for safety reasons.

Response: The range of alternatives responds to safety issues differently. See Section 3.2.1 for this discussion.

5) **Comment:** The Forest Service should fully address the issue of conflict and safety for skiers.

Response: The range of alternatives responds to safety and conflict issues differently. See Section 3.2.1 for this discussion.

6) **Comment:** The validity of the safety issue is questionable.

Response: The potential of accidents is the focus of the disclosure.

7) **Comment:** Connecting trail is a safety issue

Response: Safety within the connecting trail is disclosed in Section 3.2.1.

8) **Comment:** Safety is an issue because of powerful machines

Response: The range of alternatives responds to safety differently. See Section 3.2.1 for this discussion.

9) **Comment:** Analysis must consider unauthorized summer use of trail.

Response: This is addressed in Section 1.6.1.8.

10) **Comment:** Questions the validity of issue addressing effects to moose and their habitat.

Response: We have relied on habitat delineation of the Utah Division of Wildlife Resources, the agency responsible for managing wildlife in the State of Utah. Further, a Forest Service wildlife biologist has analyzed effects to moose in Section 3.7.

11) **Comment:** The Forest Service needs to analyze the effects of the alternatives on private property and private interests.

Response: This has been identified as a new issue (Section 1.6.1.4) and its effects are disclosed in Section 3.4.

12) **Comment:** The Forest Service should address snowmobile issues including safety, emergency egress (including medical, mechanical, and weather-related), dispersal, understandable boundaries, and snowmobile opportunities and experiences (including variety of terrain).

Response: Snowmobile issues have been added to the issues (Section 1.6.1.1) and the effects (Section 3.2.1).

13) **Comment:** The Forest Service should consider Med-Arb issues and criteria.

Response: We have reviewed the criteria used in the process and issues have been added as appropriate (see Section 1.4 and Section 1.6.1).

14) **Comment:** Snowmobile trailhead capacity should be considered in the final EA.

Response: Trailhead capacity is a self-controlling factor. The purpose and need is to provide opportunities for different groups. Trailhead capacity is outside the scope.

15) **Comment:** Emergency egress needs to be clearly defined.

Response: It has been identified in the alternatives where egress is necessary. Please review the alternative maps.

16) **Comment:** The Forest Service should consider beginner skier needs.

Response: A variety of terrain is available for different levels of abilities within the range of alternatives.

17) **Comment:** Scoping of potential users is too restrictive; failed to include other non-motorized entities.

Response: The scoping documents were mailed to about 360 addresses. The formal notice and comment period was published in the paper of record and the Forest website and a letter was sent to about 350 addresses. Also, winter recreationists include skiers, snowshoers, dog sledders, snowmobilers, and others, of all levels and abilities (See Section 1.6.1.1 and Section 1.6.1.2).

18) **Comment:** The Forest Service should consider non-motorized interests as a beginning point to a compromise.

Response: The alternatives respond to the purpose and need and the significant issues identified in Section 1.6.1. Non-motorized interests are responded to in several alternatives.

19) **Comment:** Tourism and local economy need to be addressed.

Response: Alternatives address the relative mix of motorized and non-motorized winter recreation in the Tony Grove – Franklin Basin area. The total amount of winter recreation use is not expected to change with the implementation of any of the alternatives (even if some of the use is displaced to another area of the district). The effect on tourism and the local economy would not differ between alternatives (see Section 3.9.4).

20) **Comment:** Concerned about the feasibility of enforcing alternatives, including funding and specific boundary locations.

Response: Some boundary locations are more easily identified. This has been identified under manageability (Section 3.3). The level of funding for implementation of the decision is outside the scope.

21) **Comment:** Restricting snowmobiles will restrict use by people with disabilities. This would appear to violate the Americans with Disabilities Act.

Response: A mix of winter recreation uses in the Tony Grove – Franklin Basin area is provided for in all the alternatives, except Alternative 4. In that alternative, motorized opportunities would be provided other places on the District.

22) **Comment:** The Forest Service needs to implement a permit system for parking.

Response: Implementing a permit system for parking is outside the scope of this analysis. Currently, trailhead parking is managed as a first-come, first served basis.

23) **Comment:** Motorized use near Blind Hollow (USU) yurt will have negative effects on USU students and classes.

Response: The effect on private permits and property has been added as issue 1.6.1.4 and its effects are disclosed in Section 3.4.

24) **Comment:** The Forest Service did not consider the investment in grooming equipment.

Response: Grooming equipment can continue to be used in many places on the Logan Ranger District.

25) **Comment:** The Forest Service failed to adequately communicate with and involve the public. Comment suggesting a communication plan be prepared with the decision.

Response: We agree; we have prepared a communication plan for release of the decision.

26) **Comment:** The collaborative process was not open to the public.

Response: The process conducted during the spring/summer of 2005 was open to anyone who wanted to participate. It was conducted prior to the initiation of this proposal. That process is outside the scope of the analysis.

27) **Comment:** Documentation is lacking regarding the resolution of the 2003 revised forest plan appeals process, history, background, and current condition.

Response: A brief history is provided in Sections 1.2 and 1.2.1. The current condition is described in Chapter 3 under Affected Environment.

28) **Comment:** The Forest Service did not allow enough time for responses.

Response: We followed the procedures outlined in 36 CFR 215.5(6)(b)(iv) which allows public comment 30 days following the date of the legal notice publication.

29) **Comment:** Confusion regarding two scoping periods and two proposed actions.

Response: The first scoping period in November 2005 pertained to the connecting trail only. At the time it was the only decision that needed to be made. Later in May 2006 the scope of the analysis expanded to the current proposed action.

30) **Comment:** The EA and maps are inadequate. The Forest Plan amendment appears to be significant.

Response: 36 CFR 215.5 regulations allow the Responsible Official to decide the best time for notice and comment period. In this instance Faye Krueger decided a preliminary EA would be reviewed. It was not meant to disclose a complete analysis. The review of the significance of the Forest Plan amendment is shown in Section 2.3.2.

31) **Comment:** The document is biased toward the skiers' perspective and ignores snowmobiler issues.

Response: We have presented what we consider a fair and objective analysis.

32) **Comment:** The document is biased toward the motorized perspective and ignores the revised forest plan.

Response: We have presented what we consider a fair and objective analysis.

33) **Comment:** The preliminary EA should basically "dot the i's and cross the t's".

Response: We are finalizing the EA and making changes in response to comments as needed to fully disclose the effects.

34) **Comment:** The Forest Service decisions are being influenced more by politics than careful study.

Response: The Responsible Official will make her decision based on social and environmental effects with consideration of public comment.

35) **Comment:** The analysis is biased, arbitrary and capricious, and public involvement has not been adequate or fair.

Response: We have presented what we consider a fair and objective analysis. Public involvement was open to anyone who chose to participate (see Section 1.5 and Section 1.6).

36) **Comment:** The Forest Service failed to adequately consider all scoping comments, identification of issues and development of alternatives.

Response: Because a preliminary EA was reviewed during the 30 day notice and comment period, it could be misperceived as non-responsive and incomplete. Additional alternatives and issues have been added to the analysis.

37) **Comment:** The Forest Service failed to follow NEPA and should prepare an EIS.

Response: EISs are prepared when there may be significant effects from the proposed action. We reviewed the analysis and none of the effects are significant. Please refer to the Finding of No Significant Impact included in the Decision Notice for details.

38) **Comment:** Feels process and alternatives need further study, does not go far enough to protect resource.

Response: The final EA includes additional alternatives and further effects disclosure. The array of alternatives protects the environment to varying degrees.

39) **Comment:** The WCNF should carefully consider other alternatives that maximize recreational uses for both motorized and non-motorized users.

Response: We have added alternatives, responsive to the purpose and need, to more fully address all comments and issues.

40) **Comment:** Supports a parking pass for trailhead.

Response: The analysis is being conducted to determine areas open to each use. Please refer to Section 1.6.2 for issues outside the scope.

41) **Comment:** The alternatives presented in the preliminary EA are inadequate and do not address the issues. In particular they do not seriously address the issues of access and safety for the full spectrum of winter forest uses.

Response: We have added issues and alternatives to the final EA to more fully address all users.

42) **Comment:** The Forest Service needs to revisit the issues and provide a full range of alternatives including increases in non-motorized opportunities.

Response: Alternative 5s and 6 increase non-motorized opportunities.

43) **Comment:** Questioned if the analysis complies with Department of Agriculture's instructions to ensure all users have ample and safe access to the fullest possible range of winter recreation opportunities on the forest.

Response: The array of alternatives responds to providing a range of winter recreation opportunities in this specific area. Winter recreation opportunities on the forest are addressed in the Forest Plan.

44) **Comment:** The WCNF should consider options proposed by snowmobile groups during the Med-Arb process that would optimize recreational experience for both motorized and non-motorized winter sports enthusiasts.

Response: The proposal presented to the Forest Service by the snowmobilers on June 27, 2005 was closely represented in Alternative 1. Further alternatives suggested by snowmobiling enthusiasts during the notice and comment period have been added as well.

45) **Comment:** The range of alternatives is inadequate.

Response: We have added several alternatives to the final EA that are responsive to public comment and meet the purpose and need. Please refer to Chapter 2.

46) **Comment:** The simplified management alternative should be considered.

Response: This alternative has been added. Please see Alternative 7.

47) **Comment:** The Forest Service should consider combining portions of Alternative 1 and 3.

Response: This alternative has been added as Alternative 1C.

48) **Comment:** The Forest Service should consider opening the entire snow covered area to shared use (except for possibly the lower elevations necessary for perceived moose winter range).

Response: Alternative 7 best responds to this suggestion.

49) **Comment:** The Forest Service should consider eliminating all motorized vehicles from the area from Twin Creek road up to Naomi and over to Steep Hollow, or, alternate human powered and motorized users on the left and right side of all of Logan Canyon every two weeks. This could be controlled.

Response: Alternatives 2, 4, and 5 respond to the first suggestion. The suggestion using the right side of Logan Canyon to alternate uses is beyond the geographic scope of the decision to be made.

50) **Comment:** The Forest Service should consider improving and plowing the Franklin Basin road north past the entrance to Hell's Kitchen Canyon and developing new parking for snowmobile users.

Response: This could be considered in Alternative 6, should that be the selected alternative.

51) **Comment:** Winter snow trail should be utilized as a walking/horse trail in the summer.

Response: This suggestion is not responsive to the purpose and need which relates only to winter recreation opportunities.

52) **Comment:** The Forest Service should charge a user fee. In particular the SnowPark pay system for all users was suggested.

Response: The purpose and need relates to providing winter recreation opportunities. Whether or not a fee is charged is outside the scope of this analysis.

53) **Comment:** The Forest Service should analyze three alternatives in relation to skier experience and safety; maximize area closed to motorized (2005 collaborative process), provide over the snow trail along Hwy 89, and provide an alternative that limits access and egress to emergencies.

Response: In response to these suggestions we developed and analyzed Alternative 6 and Alternative 1B. An alternative to use the Highway 89 easement is addressed in Section 2.2 (3). Please refer to Chapter 2.

54) **Comment:** The Forest Service should explore using the Highway 89 easement as a reasonable alternative to the "snow trail".

Response: Please refer to Section 2.2 (3).

55) **Comment:** The Forest Service should consider a new alternative dubbed the "Everyone Everywhere" alternative.

Response: Please refer to Alternative 5 that has been added in response to public comment.

56) **Comment:** The Forest Service should consider increasing non-motorized opportunities and areas, including restricting motorized vehicles to a few established trails.

Response: Alternatives 5 and 6 are responsive to this suggestion.

57) **Comment:** The Forest Service must analyze an alternative that maximizes areas closed to motorized use both forest-wide and in the project area.

Response: Alternatives 5 and 6 are most responsive to maximizing areas closed to motorized use in the project area. Consideration of this suggestion forest-wide is outside the geographic scope of the analysis.

58) **Comment:** The Forest Service should consider providing more groomed trails and make bathrooms accessible.

Response: The scope of this analysis is limited to defining areas for motorized and non-motorized use and providing access to Franklin Basin and Tony Grove parking areas. These suggestions are outside the scope of the analysis.

59) **Comment:** Make Tony trailhead larger.

Response: The scope of this analysis is limited to defining areas for motorized and non-motorized use and providing access to Franklin Basin and Tony Grove parking areas. These suggestions are outside the scope of the analysis.

60) **Comment:** Prohibit snowmobiles between Tony Grove and Franklin Basin roads.

Response: Alternatives 2, 4, and 5 respond to this suggestion in that they prohibit motorized use either entirely (Alternative 4) or part of the time (Alternatives 2 and 5) for all or most of the area described.

61) **Comment:** The Forest Service should consider an alternative that reflects the 1997 travel map, because it is easier to enforce.

Response: Alternative 7, which closely reflects the 1997 travel map, is responsive to this suggestion.

62) **Comment:** Open Bunch Grass trail in the spring.

Response: Alternative 5, which opens to motorized access the higher bowls from Tony Grove after some date when non-motorized use declines (approximately April 15), best responds to this suggestion (see Section 2.1.8).

63) **Comment:** There needs to be mitigation measures for minimizing safety risks and impacts to skier experience.

Response: The range of alternatives is such that under some alternatives safety risks and impacts to skiers are minimized. Alternatives 5 and 6 best respond to these concerns.

64) **Comment:** Monitoring and mitigation must be built into all action alternatives.

Response: Section 3.3, Manageability and Enforceability, speaks to monitoring. Mitigation measures are provided in Section 2.1.11.

65) **Comment:** Supports alternative 1. Comment in favor of motorized winter recreation and keeping areas open to motorized use

Response: Thank you for your comment.

66) **Comment:** Pinch point has no snow some years and could not be used as an escape route.

Response: We recognize the issue with this rocky area and have provided alternate escape routes in the alternatives.

67) **Comment:** The Forest Service should consider an improvement to Alt 1 by adjusting the boundary between Tony Grove parking area and lower portion of the Tony Grove Road so snowmobilers can stay on snow.

Response: Alternatives 1A, 1C, 3, 6 and 7 have this area open to motorized.

68) **Comment:** The Forest Service should consider improving Alt 1 by adding more snowmobile routes and play areas.

Response: The scope of this analysis is limited to defining areas for motorized and non-motorized use and providing access to Franklin Basin and Tony Grove parking areas. These suggestions are outside the scope of the analysis.

69) **Comment:** The Forest Service should consider grooming the connector route to full width. The over the snow connector trail would need good maps and signage to help users understand the new restriction.

Response: Alternative 1A best responds to this suggestion (See Section 2.1.2).

70) **Comment:** The Forest Service should adjust the boundary between Tony Grove parking area and lower portion of the Tony Grove Road so snowmobilers can stay on snow. The over the snow connector trail should be groomed full width all the way.

Response: Alternative 1A best responds to this suggestion (See Section 2.1.2).

71) **Comment:** The final decision needs to include snowmobile access from private property.

Response: Alternatives 1, 1A, 1B, 1C, and 7 respond to this suggestion for access for adjacent private property.

72) **Comment:** Alternative 1 reduces and fragments an area closed to motorized use, eliminates beginner and family terrain, increases user conflicts and impacts non-motorized users experience and safety.

Response: These issues are addressed under the non-motorized recreation experience (see Section 3.2.2).

73) **Comment:** The Forest Service should adjust Alternative 1 by including the area from Cold Water Spring down Twin Creek as in Alt. 3.

Response: Alternative 1C best responds to this suggestion (See Section 2.1.4).

74) **Comment:** The Forest Service should adjust Alternative 1 by opening the Tony Grove Creek area to accommodate spring (snowmobile) use.

Response: Alternatives 1A, 1C, 3, 6 and 7 have this area open to motorized.

75) **Comment:** Alternative 1 should be modified to include big curve and have "Motorized Emphasis Area".

Response: The purpose and need is to manage the mix of motorized and non-motorized winter recreation uses in this area. The decision will determine how the "mix" will be mapped. Although there is no official designation as "motorized emphasis area", that type of use is consistent with areas mapped and managed as "motorized".

76) **Comment:** The Forest Service should consider a 50 foot setback to prevent large parties from becoming violators while reassembling groups as part of the 20 foot wide fully groomed trail.

Response: This suggestion is addressed in Section 2.2.

77) **Comment:** Opposes this Alternative 2 because segregation is not the answer, is unmanageable, benefits snowmobilers, and would increase conflicts.

Response: The effects of Alternative 2 have been disclosed in Sections 3.2 and 3.3.

78) **Comment:** Alternative 2 is unacceptable because the area is too important to lose for half the winter; create undue hardship to visitors and local businesses; cause overcrowding and safety concerns in other places on the District; benefits the skier community; doesn't provide for equity of use (more snowmobilers using this area than skiers). Manageability will be a problem since people access the area from Idaho.

Response: The effects of Alternative 2 related to these issues have been disclosed in Chapter 3, Sections 3.2, 3.3, and 3.9.

79) **Comment:** Alternative 2 doesn't address issue of late season snowmobiling; Snowmobiling continues in this area until May and June; most skiers don't use area after April.

Response: Alternative 5, which opens to motorized access the higher bowls from Tony Grove after some date when non-motorized use declines (approximately April 15), best responds to this suggestion (see Section 2.1.8).

80) **Comment:** Alternative 2 is the not acceptable choice because it reduces the amount of time by 50%.

Response: The effects of Alternative 2 have been disclosed in Section 3.2.

81) **Comment:** There is little precedence of success for this type of management in other areas. There is no Forest Service precedent for closure to pedestrians.

Response: Temporal or timing closures have been implemented in many places. Mill Creek Canyon and City Creek Canyon are two local examples.

82) **Comment:** Alt 2 would not leave enough time for snowmobile tracks to fill in.

Response: The effects of Alternative 2 have been disclosed in Section 3.2.2.

83) **Comment:** Temporal use creates scheduling problems; difficult to plan trips.

Response: The effects of Alternative 2 have been disclosed in Section 3.2.

84) **Comment:** Alt 2 will increase compacted snow around yurts (snowmobile tracks) and increases the avalanche danger because of greater area of compacted snow from snowmobiles.

Response: The effects of Alternative 2 have been disclosed in Section 3.2.2.

85) **Comment:** Alt 2 has impact to air quality, creates a lack of untracked snow, causes scheduling difficulties, and could result in yurt vandalism.

Response: The effects of Alternative 2 have been disclosed in Section 3.2, 3.4, and 3.5.

86) **Comment:** Alt 2 decreases safety issues concerning collisions or avalanche danger, but increases potential for falls due to hard snowmobile tracks under powder

Response: The effects of Alternative 2 have been disclosed in Section 3.2.2.

87) **Comment:** Alt 2 is good because temporal separation; everyone everywhere is better, less moose impacts, yurt removal will decrease vandalism.

Response: The effects of Alternative 2 have been disclosed in Section 3.2; Effects of Alternative 5 related to these issues are disclosed in Section 3.2, 3.4, and 3.7.

88) **Comment:** Alt 2 minimizes noise effects.

Response: The effects of Alternative 2 related to noise have been disclosed in Section 3.2.2.

89) **Comment:** Alt 2 short time periods mean less chance for untracked powder.

Response: The effects of Alternative 2 have been disclosed in Section 3.2.2.

90) **Comment:** Alt 2 will be difficult to enforce and unclear boundaries will be hard to manage.

Response: Manageability and enforceability effects are discussed in Section 3.4.

91) **Comment:** Alt 2 restricts dog sled team.

Response: Sled dog use was included in the non-motorized recreation user group, as discussed in Section 1.6.1.2 (“including skiers, snowshoers, and others”). The effects of Alternative 2 on the non-motorized experience are disclosed in Section 3.2.2.

92) **Comment:** Alternative 2 should require that fines for skiers in a motorized area should be the same as for snowmobilers in a closed area.

Response: The closures would be enforced equitably for both groups; manageability and enforceability effects are disclosed in Section 3.3.

93) **Comment:** There are almost no other non-motorized options on the District during the two weeks the area is motorized.

Response: The Revised Forest Plan set aside numerous areas for non-motorized winter recreation including, but not limited to, Green Canyon, Dry Canyon, Garden City, Smithfield Canyon, and High Creek.

94) **Comment:** Alt 2 will promote use by broad range of non-motorized users and build support for a permanent closure.

Response: The effects of Alternative 2 on the winter recreation experience (motorized and non-motorized) have been disclosed in Section 3.2.

95) **Comment:** The Forest Service should consider adjusting Alt 2 to increase time periods.

Response: Alternative 5 provides a temporal alternative with a longer period of alternating use.

96) **Comment:** The Forest Service should consider a trial period of implementation for Alt 2.

Response: Should Alternative be chosen, the Responsible Official has the option of including this in her decision.

97) **Comment:** Alt 2 is not feasible for yurt owners.

Response: The effect on yurt owners is disclosed in Section 3.4.

98) **Comment:** The Temporal Alternative does not consider land owned by other government agencies within the project area and how FS decisions will affect their management (such as State-groomed trails and the SITLA parking area).

Response: That is correct; decisions regarding State land are made by the appropriate State office. Forest Service decisions on adjacent properties are coordinated with those State offices. A correction was made in Alternative 2; the Franklin Basin parking area is SITLA; no decision regarding its use would be made by the Forest Service. The State-groomed trails on National Forest are groomed under a memorandum of understanding with the Forest Service.

99) **Comment:** The area in question is highly promoted by local groups and closing the area every two weeks would lead to chaos, over-crowding and safety issues.

Response: The effects of Alternative 2 have been disclosed in Section 3.2.

100) **Comment:** Supports alternative 3 in favor of non-motorized winter recreation and maintaining the 2003 Forest Plan decision.

Response: Thank you for your response.

101) **Comment:** Alternative 3 is the only alternative that provides improved safety and opportunity for non-motorized activities, protects the environment, and is consistent with the 2003 Plan.

Response: The effects of Alternative 3 have been disclosed in Chapter 3.

102) **Comment:** Opposed to Alternative 3; it has unmanageable boundaries, creates safety issues for snowmobilers, and eliminates access/egress routes.

Response: The effects of Alternative 3 have been disclosed in Chapter 3.

103) **Comment:** Opposes Alt 3.

Response: Thank you for your response.

104) **Comment:** Alternative 3 fueled the entire debate over segregation of winter recreation and completely evades the five primary snowmobiler concerns. Further, it caters to non-motorized use.

Response: We have added an issue addressing snowmobiler concerns (See Section 1.6.1.1) and further disclosed effects.

105) **Comment:** Alternative 3 provides less than 1% of snowmobile closure within the region; it is a minimal snowmobile closure; it provides a sanctuary for wildlife and human powered activities; it is easiest to control; it eliminates a lot of the conflict that human powered and motorized users have; it allows some separation; it eliminates the snow trail.

Response: The effects of Alternative 3 have been disclosed in Chapter 3.

106) **Comment:** Alternative 3 negatively effects private property it cuts off access from private property.

Response: The effects to private property are disclosed in Section 1.6.1.4.

107) **Comment:** Alt 3 provides for best terrain for all levels of skiers and snowshoers, allows yurt system to flourish by providing best access to them.

Response: The effects of Alternative 3 have been disclosed in Chapter 3; effects to yurts are disclosed specifically in Section 1.6.1.4.

108) **Comment:** Alt 3 area dilutes noise.

Response: The effects of noise are disclosed in Section 1.6.1.2.

109) **Comment:** Alt 3 provides best untracked powder.

Response: The effects on untracked powder are disclosed in Section 1.6.1.2.

110) **Comment:** Alt 3 safety similar for Alt 2 but worse for snowmobiles if true emergency.

Response: Safety concerns for snowmobilers are disclosed in Section 1.6.1.1.

111) **Comment:** Alt 3 better for air quality than Alt 1.

Response: Effects to air quality are disclosed in Section 1.6.1.2.

112) **Comment:** Alt 3 historically improved skier experience.

Response: Effects to skier experience are disclosed in Section 1.6.1.2.

113) **Comment:** Misuse of emergency route would necessitate compensation of additional area for non-motorized use.

Response: Manageability and enforceability of alternatives are discussed in Section 1.6.1.3.

114) **Comment:** Alt 3 reduces backcountry conflict but keeps social conflict and boundaries can't be enforced.

Response: Effects to skier experience are disclosed in Section 1.6.1.2. Manageability and enforceability of alternatives are discussed in Section 1.6.1.3.

115) **Comment:** Some system should be in place to document emergency egress to prevent abuse.

Response: Boundary violations and trespass have been reported to the Logan District; these reports and photos are kept on file. Sample parking lot surveys have been conducted to ascertain the reasons for emergency egress.

116) **Comment:** The Forest Service doesn't get funded enough to enforce.

Response: The ease of manageability and thus our ability to effectively manage boundaries is analyzed in Section 1.6.1.3. However, the level of law enforcement funding is outside the scope of the NEPA analysis (Section 1.6.2).

117) **Comment:** Big closures for motorized users in Alt 3 are not needed because skiers can't reach all the areas anyway.

Response: The winter recreation experience and effects to it (both motorized and non-motorized) are documented in Sections 3.2, 3.2.1 and 3.2.2.

118) **Comment:** Opposes Alternative 4.

Response: Thank you for your comment.

119) **Comment:** Alternative 4 is unacceptable; Forest Service has provided no conclusive evidence that points toward a "no use" alternative; closing the area. Alt 4 sidesteps the issues; everybody loses, especially private landowners. The FS is paid to manage the land.

Response: The Multiple Use concept does not dictate every use must be managed on every acre. Under Alternative 4 the area could be managed to benefit wildlife.

120) **Comment:** Wildlife doesn't justify decision.

Response: Please refer to the Decision Notice for the rationale for the decision.

121) **Comment:** Alternative 4 would be an interesting experiment.

Response: Thank you for your comment.

122) **Comment:** Alternative 4 eliminates use impacts, eliminates social backcountry conflict, boundaries are enforceable, no wildlife impacts no need for mitigation but

stops all need for mitigation, stops all users, punishes all users, puts Powder Ridge out of business.

Response: The effects of Alternative 4 are disclosed in Chapter 3.

123) **Comment:** Alternative 4 is unacceptable. Closing the area to all users will just increase use in the remaining areas and increase trailhead overcrowding to the breaking point.

Response: It could have the effect of shifting use to other areas. Users experience could be affected negatively if they object to more use at trailheads and in the backcountry. The perception of crowding will depend on the user.

124) **Comment:** We support Alternative 4 first, Alternative 3 second.

Response: Thank you for your comment.

125) **Comment:** The Forest Service's current proposed action appears contrary to the 2003 Forest Plan.

Response: The proposed action, Alternative 1 would require a non-significant Forest Plan Amendment (see Section 2.3).

126) **Comment:** Expressed desire to have a safe, quality ski experience free of conflict; it is interrupted by noise, tracks, additional people, and air quality problems.

Response: Thank you for your comment.

127) **Comment:** Suggest that skiers looking for wild settings should ski in the Naomi Wilderness or across Highway 89.

Response: We agree there are other locations for backcountry skiing just as there are other areas for snowmobile use.

128) **Comment:** The Forest Service should consider asymmetrical experience effects.

Response: The effects on each type of user are disclosed in Sections 3.2 in Chapter 3.

129) **Comment:** Skiers need varied terrain opportunities.

Response: This is included in the issue of non-motorized recreation experience (Section 1.6.1.2) and the effects are disclosed in Section 3.2.2.

130) **Comment:** The Forest Service should consider all environmental effects including the human environment and should quantify effects on skier experience.

Response: The effect on skier experience by each alternative is disclosed in Section 3.2.2 in Chapter 3.

131) **Comment:** Concerned with the smell of snowmobiles and their effect on air quality.

Response: The effect from snowmobiles on air quality is disclosed in Section 3.2.2 in Chapter 3. We have added smell of exhaust to the non-motorized experience issue.

132) **Comment:** The smell of snowmobiles is not a problem for some users.

Response: We have described the effect of smell of exhaust in Section 3.2.2.

133) **Comment:** Issue is greater than air quality at parking areas; measuring air quality at parking lot does not address issue; skier expectations are higher than Clean Air Act.

Response: We acknowledge that the smell of exhaust is particularly disturbing to skiers. This has been added to the effects disclosure in Section 3.2.2.

134) **Comment:** New snowmobiles are cleaner and cause less air quality concern.

Response: We agree however not all users have new snowmobiles.

135) **Comment:** The Forest Service should provide quantitative information of motorized activity on air quality.

Response: We have analyzed the impacts on air quality to EPA's standards. EPA is the federal agency responsible for these standards.

136) **Comment:** The Forest Service should quantify noise levels of snowmobiles and should consider the irreparable impact to skiers' experience; noise is especially bad in canyons and parking lots.

Response: The issue of noise and its effect on the non-motorized experience is disclosed in Section 3.2.2.

137) **Comment:** Noise is not a problem for some users.

Response: We have described the effect of noise in Section 3.2.2.

138) **Comment:** After-market exhaust systems are noisy and should not be allowed.

Response: Utah State laws govern the registration and operation of snowmobiles. This suggestion is outside the scope of Forest Service authority.

139) **Comment:** Sufficient opportunities for untracked snow are not be provided in Alt 2.

Response: The effects of Alternative 2 on skier experience are disclosed in Section 3.2.2.

140) **Comment:** Suggests that skiers have opportunities for untracked powder in many other places (Green Canyon, Wood Camp, Cherry Creek, etc).

Response: We agree just as snowmobilers have other places to go as well.

141) **Comment:** Suggests it is easier for non-motorized users to experience untracked powder snow in Alt 3; It provides aspects that hold powder snow.

Response: The effects of Alternative 3 on skier experience are disclosed in Section 3.2.2 .

142) **Comment:** The Forest Service should provide quantitative information on the amount of untracked snow in alternatives.

Response: It is impossible to predict where each user would travel on any given day because it is dependant upon the weather, snow conditions and the individual user’s desire. A qualitative discussion provides adequate effects disclosure to the public and Responsible Official.

143) **Comment:** Expressed general concern for skier safety, including conflict, confrontations, and collisions; felt these will increase under Alt 1.

Response: Skier safety is discussed in Section 3.2.2 of Chapter 3.

144) **Comment:** Questions the validity of the skier safety issue because of lack of supporting evidence.

Response: The potential for accidents is the focus of the disclosure.

145) **Comment:** Expressed belief there would be increased safety under Alt 3; it provides approaches to higher bowls, while allowing for emergency egress for snowmobiles.

Response: The issue of safety is disclosed from both the skier’s and snowmobiler’s perspective. Both perspectives view “safety” differently; the effects disclosure reflects that.

146) **Comment:** Safety would be increased due to minimized conflicts in Alt 2.

Response: Effects of Alternative 2 (including the effects on safety) are disclosed in chapter 3; safety (for both motorized and non-motorized uses) is discussed in Sections 3.2.1 and 3.2.2.

147) **Comment:** Shared parking lots are a source of conflict.

Response: Alternative 6 responds to the issue of shared parking.

148) **Comment:** The preliminary EA lacks a hard look at safety effects.

Response: Safety effects have been disclosed in Sections 3.2.1 and 3.2.2 in Chapter 3.

149) **Comment:** Expressed concern over safety on groomed trail; it increases snowmobile speed and has limited visibility causing a safety concern for skiers.

Response: Safety effects, including those related to use of the snow trail, have been disclosed in Sections 3.2.1 and 3.2.2 in Chapter 3.

150) **Comment:** The Forest Service should consider the actual winter use pattern that currently exists on the ground.

Response: This information has been considered and is discussed in Chapter 3, Section 3.2.

151) **Comment:** Concerned about avalanche danger due to snowmobilers high marking over skiers.

Response: Safety effects have been disclosed in Section 3.2.1 in Chapter 3. Both motorized and non-motorized users can trigger an avalanche. All users have an obligation to behave responsibly in the backcountry.

152) **Comment:** Concern that conflict and unsafe actions will increase if snowmobiles are allowed in non-motorized areas.

Response: In some alternatives users are segregated in time or space; in others they are not. These differences are disclosed in Chapter 3.

153) **Comment:** Conflict has increased as evidenced by vandalism acts against the yurts.

Response: Vandalism is an unacceptable action. It may be the evidence of increased conflicts or the illegal acts of a few.

154) **Comment:** The Forest Service should address erosion, water quality impacts, stream crossings, and the impacts of bridges, and provide indicators for these issues.

Response: Impacts to water quality are disclosed in Section 3.5.

155) **Comment:** Expressed belief that snowmobiles do no environmental harm.

Response: Environmental effects are disclosed in Chapter 3.

156) **Comment:** Expressed belief that the mitigation measures will provide adequate protection of water quality.

Response: Alternatives, including mitigation measures, are designed to limit impacts to the environment. Impacts to water quality are disclosed in Section 3.5.

157) **Comment:** The Forest Service should address impacts to aquatic habitat (especially Bonneville cutthroat trout); DWR should be consulted on BCT.

Response: Please see Section 3.5. The Division of Wildlife Resources, through the State of Utah Resource Development Coordination Committee was afforded an opportunity to comment on the preliminary EA.

158) **Comment:** The Forest Service should include indicators for the issue of illegal use of the snow trail by OHVs in the summer; prohibiting this use will be difficult to enforce.

Response: Mitigation has been provided in those alternatives proposing the snow trail. Manageability and enforceability are discussed in Section 3.3.

159) **Comment:** Visual impacts to the Logan Canyon Scenic Byway must be considered and indicators for this issue should be included in the EA.

Response: Visual impacts are disclosed in Section 3.6

160) **Comment:** Expression of belief that motorized use has more negative effects on wildlife than non-motorized.

Response: Effects on wildlife from both uses are disclosed in Section 3.7.

161) **Comment:** Expression of belief that if animals are being disturbed, then neither group should be there.

Response: Thank you for your response.

162) **Comment:** The Forest Service should address the impacts to the wildlife corridor.

Response: Effects on the wildlife corridor, especially as related to lynx and wolverine, are disclosed in Section 3.7.

163) **Comment:** The Forest Service should address the impact to crucial winter range and the wolverine and lynx.

Response: Effects on wildlife, including the lynx and wolverine, are disclosed in Section 3.7.

164) **Comment:** The Forest Service should include indicators for the issue of effects to moose and moose habitat.

Response: The issue related to effects on wildlife includes the effects to moose and moose habitat, along with numerous other wildlife species.

165) **Comment:** Expression of belief that the connector trail provides for a route for snowmobilers to comply with the moose wintering habitat concerns.

Response: The effects of each alternative including those proposing the snow connector trail are included in Chapter 3. Effects to moose and other wildlife are disclosed in Section 3.7.

166) **Comment:** Expression of belief that since moose are increasing in Logan Canyon, apparently snowmobiles are not causing them to decrease.

Response: The effects of each alternative on moose are included in Section 3.7.

167) **Comment:** The over-the-snow trail may not be needed since wintering moose generally stay near the Logan River in the willows, and snowmobiles simply don't go there.

Response: We have relied on habitat information from the Utah Division of Wildlife Resources, the state agency responsible for managing wildlife.

168) **Comment:** The Forest Service should address the impacts to vegetation.

Response: Impacts to vegetation are addressed adequately in the wetlands/water quality/aquatics issue (Sections 1.6.1.5 and 3.5) and the wildlife habitat issue (Sections 1.6.1.7 and 3.7).

169) **Comment:** The Forest Service should address the continued loss of snowmobile opportunities cumulatively throughout the Wasatch-Cache front.

Response: This has been addressed at the appropriate geographic scope in the EA.

170) **Comment:** Comment regarding any part of the decision-making process lacking information or being flawed.

Response: The EA has been prepared in accordance with CEQ regulations and Forest Service guidance from the handbook, and in accordance with 36 CFR 215 Notice and Comment regulations.

171) **Comment:** Comment suggesting that everyone has a right to use the area; everyone can share.

Response: Thank you for your comment.

172) **Comment:** General comment opposing Alts 2, 3, and 4.

Response: Thank you for your comment.

173) **Comment:** Comment suggesting skiers pay a use fee.

Response: The purpose and need relates to providing winter recreation opportunities. Whether or not a fee is charged is outside the scope of this analysis.

174) **Comment:** Comment regarding the economic benefits of use.

Response: Effects to tourism and the local economy are addressed in Section 3.9.4.

175) **Comment:** General comment about Beaver Creek (outside the project area).

Response: Decisions regarding the Beaver Creek area are outside the scope of this analysis.

176) **Comment:** General support for non-motorized use.

Response: Thank you for your comment.

177) **Comment:** General comment against the snow trail.

Response: Thank you for your comment.

178) **Comment:** General comment about the area.

Response: Thank you for your comment.

179) **Comment:** General statement favoring motorized use.

Response: Thank you for your comment.

180) **Comment:** General comment by both motorized and non-motorized user.

Response: Thank you for your comment.

181) **Comment:** Comment in favor of a Nordic Center.

Response: Thank you for your comment; provisions for a Nordic Center were analyzed in Alternative 6 and disclosed in Chapter 3.

182) **Comment:** General comment about enforcement.

Response: Thank you for your comment.

183) **Comment:** Asks FS to consider previous comments.

Response: All comments received in response to the Notice and Comment, including those requests to consider previous comments, were considered (See Content Analysis Process, Appendix B).

184) **Comment:** Comment suggests that responsible snowmobiling is the key.

Response: Thank you for your comment.

185) **Comment:** General comment that there is no real conflict.

Response: Thank you for your comment.

186) **Comment:** Comment that Tony Grove winter parking is very crowded.

Response: Dispersal and crowding were considered as part of the motorized recreation issue (See Section 1.6.1.1).

187) **Comment:** The Forest Service should provide an emergency egress trail.

Response: Emergency egress is provided for depending upon the alternative being considered. Please refer to the description of the Alternatives in Chapter 2.

188) **Comment:** EA lacks quantitative analysis, i.e. impacts on noise, vegetation, and small mammal populations.

Response: Quantitative analysis is provided where appropriate, such as acres of wetland vegetation impacted (Section 3.5) and affected acres within major habitat types (Section 3.7). In other applications, a qualitative discussion provides adequate effects disclosure to the public and Responsible Official.

189) **Comment:** A usage study needs to be done before drawing maps.

Response: The purpose and need is focused on providing opportunities to both the motorized and non-motorized user groups. It is not dependent upon knowing how many people are within each group and dividing the terrain proportionately.

190) **Comment:** The Forest Service should conduct survey research of recreation users; until that is done, decisions are relying on a very small sample size of the public.

Response: We recognize that because respondents are self-selected, they do not constitute a random or representative public sample. It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion.

191) **Comment:** The Forest Service should use scientific methods for enlightening management decisions, develop recreation surveys.

Response: Depending upon the resource being affected and the proposal being considered, scientific methods may be appropriate. Please refer to the response to Comment 190.