Response to Comments

Fremont-Winema National Forests Motorized Travel Management Project

Substantive Comments

Comments made by two or more people

1. **Preference of Alternative**: The Forest received comments supporting every alternative. Many liked the alternatives that provided the most miles of roads and trails for motorized use. Many wanted to Forest to continue with the current motorized access as shown in Alternative 1, the no action alternative. Some people also thought the range of alternatives considered was too narrow. One person felt that implementation of the travel rule should be delayed until a proposal allowing 1 mile of open road per square mile could be developed. One commenter felt that the Forest should consider an alternative where law enforcement would not be required to implement the travel rule and another that we should consider an alternative that would allow motorized use everywhere without maintenance.

***Response**: The Forest considered 6 alternatives including four that were analyzed in detail, see chapter 2 in the EA. Developing an alternative that would not involve enforcement would not be consistent with the Travel Rule and was not considered. Enforcement of motorized travel restrictions has always occurred and will continue. When implemented the MVUM will be used as an enforcement tool similar to road closure signs and Forest Closure Orders currently in use. Alternative 1 represents the current condition which allowed use on most of the 12,000 miles of road on the Forest as well as motorized off-road use. The Forest is unable to select this alternative however, because it would be inconsistent with the Travel Management Rule, which requires the Fremont-Winema National Forests to designate motorized routes and areas available for motor vehicle use by class and season of use. This alternative is only being presented to provide a comparison. The Forest is also required to maintain the road system to avoid resource damage.*

Many people responded with alternative selections without giving a reason why which does little to help the Forest make a decision. The only direction in the Forest Plan dealing with open road density is a seasonal restriction for 1 mile per square mile in mule deer winter range and 2.5 miles per square mile in summer range. Currently, there is an overall road density of 2.5 miles per square mile on the roaded portion of the Fremont National Forest. Implementing an alternative with less than 1 mile per square mile on the Forest is not required by the resource protection measures directed for use in the Forest plan.

2. **Access to Dispersed Camping**: There were many concerns about not providing enough areas for motorized access to dispersed camping. Many people thought they would lose access to traditional use areas because they were more than 300 feet off of roads. Some mentioned that the Forest should determine where historic use occurred and confine motorized access to those

areas, even if they were over 300 feet from roads. Some said the Forest should not show the roads or portions of roads which do not have a history of motorized dispersed camping. Some mentioned that the application of the designation of motorized access for dispersed camping was not used sparingly as mentioned in the Travel Management Rule.

***Response**: The Forest does not have an accurate inventory of areas used by the public for dispersed camping. Some District offices have collected data, but it is not comprehensive. This Travel Management effort targeted the current system roads, how the public used the roads and their status (whether physically open, brushed in or decommissioned). The Forest did not consider user developed routes except along routes designated for motorized access for dispersed camping. The MVUM will be adjusted to allow access or remove access where there has been no history of use or the terrain would not allow it. The Decision is a compromise to allow for continued historic use of most sites and still comply with the Travel Management Rule by limiting cross-country travel. Alternatives 3 and 4 represent little change from the existing condition with the exception of not allowing motorized access beyond 300 feet. It is recognized that those sites greater than 300 feet from roads will no longer be accessible. During site specific planning efforts, the Forest will gather more information about use of an area so future adjustments can be made to the MVUM for motorized access for dispersed camping.*

3. **Parking**: There were several comments asking to extend the distance for parking allowed off of designated routes. There were also comments asking to shorten the distance for motorized access for dispersed camping.

***Response**: Parking is typically confined to an area immediately adjacent to the road. In order to accommodate known uses of the forest (which could include the use of a trailer for horses or equipment) the definition of 'parking' includes a tow vehicle plus a trailer. The tow vehicle length, including any trailer, would allow visitors to get safely off the road when they stop for an activity. Shortening the distance visitors can use for motorized access to dispersed camping would reduce the risk for resource damage distant from roads but would tend to concentrate use at the road edges. This activity would extend vegetation clearing and create sites of high risk to the spread of invasive plants due to high levels of traffic. Parking rather than driving off the road for dispersed camping would be permitted anywhere. This allows the Forest to monitor use and evaluate resource damage that may occur due to parkin, or motorized access for dispersed camping 300 feet off designated routes.*

4. **Roadless Areas**: Some commented that the EA failed to disclose the impacts of designating roads, trails, and motorized access for dispersed camping to roadless and potential wilderness areas. Others stated that the analysis needs to look at impacts to roadless character and potential wilderness. Several said that the project should not designate roads and protect

roadless character over a larger area. Conversely, others did not want to create larger roadless or undeveloped areas.

***Response**: Public comment is split on the development of roadless and undeveloped areas. The need for the proposal is focused on implementing the Travel Management Rule utilizing the existing Forest's system roads. Identifying management for roadless character is beyond the scope of this action. Creation or expansion of roadless areas is evaluated during the forest planning process. Implementation of the Travel Rule does not include developing new motorized routes and is confined to existing system roads with the exception of motorized access to dispersed camping within 300 feet of a portion of the road system. Current maintenance levels will be utilized except where changes were needed for resource protection or where the public requested routes to be opened and there was no known resource concern. Motorized access to many places will be much the same as it is currently, except that off-road use will be prohibited. Motorized access to dispersed camping would occur in Inventoried Roadless Areas designated for semi-primitive motorized ROS settings by the Forest Plan. Of the 63 miles of roads and trails in Inventoried Roadless Areas, 28 miles are designated for motorized use and 26 miles allow motorized access for dispersed camping (about 823 acres).*

5. **Safety**: Many were concerned that users would be concentrated on a smaller road system. Concerns ranged from safety problems when multiple class vehicles use the same routes to increased potential for resource damage due to lack of maintenance. Several asked that paved roads be made available for all vehicles to provide access to roads and trails from campgrounds or large parking areas.

***Response:** An engineering and analysis was conducted to determine where there were safety concerns and where mixed motor vehicle use should occur. This analysis determined that 453 miles of road should be designed for highway legal vehicles only. Currently, 231 miles are designated for highway legal only. Implementing the travel management rule increases user safety by reducing the amount of mixed use on the higher standard roads used to access the forest. Higher standard roads (e.g. paved roads) are not suitable for mixed use. Constructing large parking areas or new trails is outside the scope of this action.*

6. **Comments dealing with discrimination**: Many respondents felt that not providing motorized access for big game retrieval or general access to the forest is discriminatory against users who are disabled or elderly. Many also felt that the special status of the Klamath Tribes that allows them to self-regulate was also discriminatory because it gave them special status over other Forest users.

***Response**: There is no legal requirement to allow people with disabilities use of motor vehicles on roads, trails, or areas that are closed to motor vehicle use. Restrictions on motor vehicle use*

that are applied consistently to everyone are not discriminatory. In the case of the Klamath Tribes, self regulation only applies on former reservation lands. Congress reaffirmed that the Klamath Tribes retained their rights to exercise their treaty rights on former reservation lands and several court cases have affirmed this right. Acknowledging the ability of the Klamath Tribes to self regulate the exercising of treaty rights on former reservation lands is not a discriminatory. See EA pages 18 and 19.

7. <u>Minimum roads analysis</u>: The Forest received several comments saying a minimum roads analysis was needed prior to designating motorized routes.

***Response**: The Forest Service directives established in 2008 detailed how Travel Planning was to be implemented. During the development of this project the directives were reviewed and it was determined that insufficient data existed at the scale necessary to make decisions about a minimum road system. As a result it was decided to concentrate exclusively on route and area designations. The Forest will pursue the identification of a minimum road system during project scale analyses.*

8. <u>Resource protection:</u> Several comments were received about only closing roads when there was a need for animal or environmental protection. Other respondents questioned the use of resource protection for determining where roads should be closed or seasonally restricted. Several commented that protection measures for species rarely seen should not be used for restricting motorized use. Concerns were voiced about restricting access on ML 1 roads within a ¼ mile of private land.

***Response**: The Forest developed several mapping layers to use during analysis that captured Forest Plan direction for resource protection. These mapping layers included protection for mule deer fawning and winter range, elk calving, key and priority watershed for fisheries, sensitive and invasive plant concerns, semi-primitive non-motorized recreation, bald eagle and spotted owl habitat protections, and sensitive cultural site areas and CFR road restrictions from past decisions. All of these protections, whether for seasonal protection or motorized closures, were used to develop each alternative. Alternative 3 applied Forest Plan direction at a watershed scale rather than forest wide, providing focused protection.*

All resource protection measures used to develop the alternatives were derived from Forest Plan direction and CFR orders dealing with motorized use. Direction in FSH 1909.12 25.4 says for an action that is not consistent with the Forest Plan to modify the action to be consistent with the plan, reject the action, or amend the plan. There is no overriding need to propose motorized use that is inconsistent with the Forest Plans. Forest Plan standards and guidelines have been

effectively used across the Forest on other projects to acquire desired conditions and affective protection of resources.

During scoping the Forest received comments from many private land owners concerning Forest Service roads that provided access to their property, damage through trespass and increased fire risk. The Forest was asked to limit access. When reviewing whether to open ML 1 roads as requested by the public, the roads were passed through a resource protection screen which included private land protection. There were a few places, like on the Chewaucan River that an compelling reason was given to access the river on a ML 1 road within ¼ mile of private lands.

9. **Lack of site specific inventory**: Many commented on project design and how lack of inventory would impact the analysis or development of an alternative. There were also several comments that required additional information to be included in the alternative descriptions.

Response*: The following comments have been considered and/or included in the development of the alternatives:*

Close duplicate road systems: Many duplicate (parallel) road systems remained closed or were closed to reduce open road densities.
Connect to the Deschutes trail system from Chemult: The Deschutes OHV trail system is currently under analysis for connection to the Chemult area with the Three Trails EIS. There are connections to adjacent Forests and BLM lands.
No cross-country motorized travel: Included in all action alternatives.
Need access to the 11 developed recreation sites: Roads providing access to these recreational sites/areas were missing in the Forest database. These roads were constructed at the time of site development, but were never recorded. They have been added to the road system database and will continue to provide access to these sites.
Allow use of snowmobile trails when snow is not present: Some snowmobile trails were considered for summer OHV use. Use of these trails will be seasonal to allow for winter snowmobile use.
Close roads and trails in wetlands, meadows, damaged areas. Included in all action alternatives.
Provide access to within ½ mile of fishing streams and lakes or points of access to streams. Access to streams was considered when designating routes.
Reduce the number of seasonal closures. The Forest looked at ways to simplify the amount of seasonal closures used for Travel Management while being consistent with Forest Plan direction and not restricting motorized use more than necessary to protect the forest's resources.

Provide access to the Chewaucan: Additional access was provided in the decision.

10. Site specific comments related to project development.

Confine dirt bikes to special areas because of their high impacts to resources
Need designated motorized play areas, like above Hagelstein Park
Create more loops
More Class II trails and routes needed than the proposed action indicates
Many comments about not using the 1,200 miles identified by the motorized groups
Plan at a scale the public would understand and are able to provide comments on

***Response**: The Forest is committed to analyze opportunities with future, site specific planning (Phase II). This planning would occur at a smaller scale following public input.*

11. Dust and Air Quality: Several respondents were concerned about possible increases in dust or detrimental air quality as a result of the Proposed Action.

***Response**: Dust from motorized use of National Forest System roads is expected. The degree of dusting depends on soil type, the type of road surface, amount of traffic, and type of traffic. Most native surface forest roads are on a soil that has low dust potential, the major exception being the pumice soils found mainly in the northwest portion of the Forest. The major access roads, Maintenance Level 3 and 4 roads have gravel or paved surfaces. Likely 80 percent of the Forest visitors utilize these roads for access to trailheads, developed recreation areas, and never leave the roads. Where there is high traffic and large trucks roads are surfaced (with gravel or asphalt) to reduce dust and other resource impacts. Dust is often deposited along the sides of roads (within 20 feet of the roads) and is most evident on the pumice soils. Summer storms often wash the dust from vegetation and harden the road surface. When a heavy commercial use occurs, like a timber sale, dust abatement measures are taken that reduce the amount of dust.*

Maintenance Level 2 roads are low speed native surface or gravel roads with low levels of use. Some grow in with brush which further reduces speed and dust. After commercial uses, roads are clear of brush but because of water drainage features (waterbars and dips) traffic speeds and dusting are low. Traffic on these roads are low so surface wear is not a major problem.

The loss or removal of natural components that stabilize the soils is the major cause of dusting. Vegetation loss and churning or removal of crusts opens soils for loss from wind and water erosion. It takes extensive areas of exposed soils, like agricultural areas or extensive aired deserts, to create dust storms or plumes. There are no extensive areas of exposed soil on the forest caused by motorized use that would carry dust into the air. Plumes are often associated

with dry lake beds or extensive areas of exposed soil. Since motorized use will be confined to roads and trails dust is expected to be localized.

The combination of agriculture, industrial clearing and sites, developments, and motorized recreation can create measureable dust that coats snow and cause early snow melts. Dusting during winter and spring is not a problem on the Forest. During the winter months the roads are moist and hardened and dusting is not likely to occur. The use of roads during the winter, spring, and fall season are not a major contributor to the dust in the Klamath Basin. Though the Klamath Basin receives less than 20 inches of moisture per year, it is spread throughout the year, most coming in the fall and winter.

12. **Enforcement**: The majority of concerns dealt with the need to provide enforcement of the new travel rule with the limited funding and availability of Forest law enforcement personnel. It was felt by some that for the first few years of implementation the number of officers should increase. There is concern that the maps will not be available when the forest offices are closed and that weekend users would be in violation of the travel management regulation. Penalties need to be clearly indicated. There was also concern about how enforcement would occur on roads the Forest Service does not have jurisdiction over.

Response*: The travel management rule only applies to the National Forest System roads the Forest has jurisdiction over. Enforcement and the limited funding for enforcement make the education aspect of the rule very important to successful implementation. Users will be held responsible for knowing where they are and maps will be provided to help locate the road systems available for motorized use. Once the system is understood, compliance is expected to increase because the Forest would no longer have to rely on signs. Law enforcement would be used to educate users during the first few years of implementation. The implementation plan will determine how maps will be made available.*

13. **Monitoring**: There have been several comments about monitoring motorized use. Some people want to know where user developed routes are located, where resource damage is occurring, and determine where motorized access to dispersed camping occurs.

Response*: Monitoring will be very important to the successful implementation of the Travel Management Rule. Data collected about current user developed routes would be collected during future planning efforts. The Forest expects the user as well as employees to feed back to the Forest places where the MVUM does not represent the current condition and adjustments need to be made.*

14. **Planning for Future Motorized Routes**: Many local motorized groups would like to be involved in the process of determining which areas should be studied for future development of trail systems.

Response*: Public participation will play a key role in the development of future road and motorized trail opportunities. This has been described as Phase II in the EA.*

15. **Signing**: Many respondents asked the Forest to sign roads that are closed or to place barricades at their intersection. Some also asked for posted speed limits.

Response*: Posting roads (with signs) as closed has been used by the Forest in the past. Other measures include gates and barricades. These methods have not been effective and have a high cost for upkeep. Signs are torn down causing confusion for those who want to be legal in their motorized use of the Forest. Until the Forest is able to secure the funding needed to provide physical closures, or the roads grow in, the MVUM will be the best management tool the forest has to designate which routes are open for motorized use.*

16. **MVUM**: There was a request to define vehicle class I, II, and III on the map to help the public understand which vehicles were grouped into what category, like highway legal only.

Response*: The tables on the MVUM will indicate which class can use each designated route.*

Individual comments

17. Why were ML 1 roads that are currently in use not shown on the alternative maps?

Response*: Alternative 1 acknowledges that ML 1 roads have been used in the past, except where they have been closed by a CFR order (EA page 23). The maps were designed to emulate the MVUM which only show routes designated for public motorized use. The map of Alternative 1 and several other maps displayed showed the entire road system including ML 1 roads. A table was provided that listed the ML 1 roads and indicated the reason for their closure.*

18. Keep accessibility to the general public as a key component for multiple use of the Forest.

Response*: Public access to the Forest was a primary consideration when designating National Forest system roads and trails for motorized use. There were a number of resource concerns dealing with big game fawning, calving, winter range, riparian and fisheries habitat, cultural history, invasive plant and sensitive plant protections that played a role in determining where motorized access would be allowed. Places that had a high concentration of parallel roads where also restricted to motorized use. The biggest change for access to the Forest is the loss of cross-country use. The Travel Management Rule prohibits cross-country use except in*

designated areas. Even with these road use changes, the Forest remains accessible with 81 percent of the Forest within a half mile of an open road.

19. The effects of changing the current policy to one where roads are closed unless identified as open have not been properly analyzed.

Response*: The EA discloses that the travel management Rule is a fundamental change that requires forest users to understand which routes are available for motor vehicle use. The MVUM is the primary enforcement tool used to determine legal use of the designated motorized route system. It is recognized that some people will have trouble reading the maps and determining where they are. The implementation plan will identify education measures to help people understand how to use and read the maps.*

20. The MVUM is hard to read and information on the map needs to be accurate.

Response: *The MVUM is based on a national template used by all National Forests. This format was developed to provide consistency from forest to forest no matter what forest people visit. The map is not intended to stand alone, but to be used with other maps like Forest Visitor Maps and other navigation tools.*

21. Do not close roads that are needed for law enforcement or fire control.

Response*: Page 14 of the EA summarizes uses and motorized vehicles that are exempt from the Travel Rule.*

22. One commenter felt the process discouraged public input from a wide range of user-groups by not providing printed copies of the EA or maps of the alternatives.

Response*: The process used to designate routes and gather input about use was quite extensive. Prior to the scoping process informational meetings were held with many user groups, partners and local government. During the scoping period the Forest held 7 public meetings. Two additional meetings were held during the comment period after the release of the EA. The Forest also participated in three Southeast Oregon Resource Advisory Council meetings to learn motorized use was desired. These meeting were attended by leaders of the motorized and non-motorized communities and discussion centered on alternatives to the Proposed Action. The maps and the EA were available on the Forest's World Wide Web page. Paper copies of the documents and maps were also made available at Fremont-Winema field offices and three libraries. Providing the maps on the internet allowed the public to view the maps and*

alternatives in the areas of the forest they had interest in. Alternatively, a CD was available that included a full copy of the EA and maps. See EA pages 15 to 17.

23. Concern the public did not have input for the roads already listed as closed but have been used for years.

Response: *Many roads were closed as a part of project level planning and involved public involvement which will continue into the future. Other roads were closed with administrative decisions due to lack of need for resource management.*

24. The F-WNFs have chosen to segment public involvement and the NEPA process by proposing two phases (Phase I and II) of travel management. Actions for Phase II need to be considered in cumulative effects for Phase I or Phase II is a connected action. The distinction between the two analyses has been blurred by adding ML 1 roads into this analysis as ML2 roads or motorized trails compared to what was initially defined to be a separate analysis for Phase II.

Response*: Phase II projects are expected to be specific to an area of the Forest to provide destination motorized trail system opportunities. Only when that information is known, will it be ready for the NEPA process. Impacts of the current proposal would then be considered as part of the cumulative effects as a past action. The NEPA process and decision are not segmented.*

The addition of ML1 roads to the analysis is in direct response to public requests. All ML 1 roads were considered to some extent. The Forest asked user groups to provide roads they would like to see open for motorized use as well as those that should be closed. These roads were analyzed with resource protection screens to determine which ML1 roads would be allowed for motorized use.

25. An EIS is needed. Converting ML1 roads to trails is a new action with significant effects to resources. Disturbance associated with increased use on these routes and resultant direct and indirect environmental effects of the proposal to expand the Forest route system could result in potentially significant and unmitigable environmental impacts.

Response*: The Forest has the ability to use the existing road system. Using ML 1 roads as trails is not a new action, the road already exists. The width of the road would not expand thereby creating additional impact. Rather, it would grow in and become narrower between times of resource management use thereby decreasing impacts. The road has been designed for motorized use with drainage structures. The drainage structures would be maintained as needed to protect resources. Motorized trails designation along existing routes does not represent new construction since they occupy old roadbeds. The project design purposely avoided areas with*

resource concerns. The use of these roads as motorized trails increased open road density which required a closure of a road elsewhere in the watershed. As a result, ML 2 roads became ML 1 and allowed the Forest to reduce the open road density in riparian zones along streams. The analysis did not indicate any significant, unmitigable impacts.

26. One respondent felt that there will be significant effects to critical habitat and unique characteristics of the Forest landscape including riparian, LSRs, Wild and Scenic Rivers, roadless areas, bull trout habitat, and other ESA and sensitive species.

***Response**: The FONSI discloses there are no significant effects. Impacts to resources will be much less than the current action because cross-country motorized use will no longer occur. Open road density in key and priority watersheds will not increase and Forest Plan standards and guidelines for LSRs, Wild and Scenic Rivers, and ESA and Sensitive species would be met. Alternative 3 reduces the amount of roads in riparian areas, particularly for recreational use consistent with INFISH direction.*

27. One person commented that the EA did not consider an adequate range of alternatives. They were also concerned that it failed to consider an alternative that closes existing routes or one that would result in a net reduction of mileage of the designated travel system. The current range of alternatives gives preference to one type of use over another and maintains the status quo.

***Response**: All action alternatives close the Forest to cross-country use. The status quo is not maintained with any of the action alternatives. Alternative 2 is the only action alternative that proposed a cross-country use area. The closure of the Forest to cross-country use provides a change in forest use and provides areas of isolation from motorized users. Because cross-country use was allowed, only 998 miles of road were not available for motorized use due to CFR closure. About 11,400 miles of system roads may have received some use. The action alternatives reduce this from approximately 6,500 miles to 7,200 miles. The Decision is a net reduction in miles of road used by the public and eliminates cross-country use.*

28. One respondent said that the NEPA process should be started over meeting with a different group of users. They also stated that the Forest should close only those roads that are clearly causing environmental damage and only close those roads if the benefit of closing outweighs the public benefit of keeping the road open. They also mentioned that a map of the proposed action should be available to all who ask for it.

***Response**: Public involvement has been incorporated into the development of alternatives. To guide the alternative development process direction from the Forest Plan was used to determine resource protection measures. Standards and guidelines have been included to determine where*

roads would be closed if environmental damage were to occur. Resource protection measures were not limited to physical damage to roads and streams but also included wildlife protection measures for wintering, nesting and fawning animals.

29. One commenter said that the Forest did not adhere to the intent of the Travel Management Rule in providing recreational opportunities to all motorized users. The intent of the rule is not to close roads. The plan does not provide an adequate range of motorized experiences by eliminating the Class II user. Phase I does not meet the intent of the travel management rule. The rule does not limit the designated routes to past administrative decisions.

***Response*:** *To meet the intent of the Travel Management Rule the Forest is designating motorized opportunity using its system roads as a base and identifying additional opportunity at site specific locations. The scale of this analysis was not adequate to develop specific motorized areas because of the amount of detail required to make an informed decision.*

30. **Do not allow motorized use on Crane Mountain because it is an IRA***:*

Response*: The motorized trail in the Crane Mountain IRA is within the semi-primitive motorized portion of MA 9 semi-primitive and is consistent with the Fremont Forest Plan.*

31. Three areas listed by the Tribes should have seasonal closures:

Response*: The Klamath Tribes asked for three areas to be seasonally closed to motorized use for protection of elk winter range. Elk winter range currently is not designated in the Forest Plan. Creating a management area for elk winter range would require a forest plan amendment providing additional direction for other resource use. The designation of elk winter range would be best handled with forest plan revision. There are likely additional areas outside the former reservation that should be considered as well. Preparing an amendment for elk winter range is outside the scope of this EA.*

32. Cannot make changes to the MVUM without providing public comment. The process should include provisions for further reducing access.

***Response*:** *Any changes to the MVUM will require public comment, whether there are additional road closures or designation of additional system roads for public motorized use. Additional information will be provided considering the development of criteria.*

33. More fully describe what is happening at Four Mile Rock Quarry. What does the closure mean and what is meant by day use?

Response**:** *Access will be restricted to the roads identified on the MVUM. Use off the designated road system will be prohibited. The quarry area will no longer be available for use as a 'play area'. Restriction of this area from overnight camping will be covered in a separate analysis.*

34. Clarify motorized use for all vehicles and the amount designated so use is not monopolized by ORVs.

Response**:** *The scope of this effort was restricted to designating the existing road system for use by vehicle class and season of use. As part of this effort all roads were evaluated for motorized mixed use involving the mixing of highway legal and non-highway legal vehicles. Most of the road system was determined safe for motorized mixed use traffic.*

35. Mismanagement of the Forest has caused economic hardship to the community with loss of jobs. Closing the forest to users does not help the economic conditions of the community.

Response*: Travel management planning does not close the Forests to users, it manages motorized access. This could change recreational use patterns, which could affect expenditures in local communities. The socioeconomic specialist report (p. 19-22) estimates the total economic contribution (measured in jobs and income) of current recreation levels. It also estimates response coefficients that report the total jobs and income supported by thousand visits by activity type. Since data does not exist that represents changes in recreation levels that would occur as a result of the Travel Management Plan, actual impacts may not be estimated across alternatives. The response coefficients (socioeconomic specialist report, p. 18-19) pared with a qualitative analysis of the alternatives serves as the basis for estimating the socioeconomic impacts.*

36. Economic analysis is not adequate. It relies on Minnesota Implan 2007 data which combines regional and local economic data not specific to the project area. The data also has a history of being manipulated by government agencies to obtain desired results. Page 115 says 24 full time jobs and $571,088 in labor income then says 8 jobs. Compare to page 9 of Social Report the numbers do not seem believable when $183.52 per visit. Also by including hikers from urban areas in the calculation to determine economic effects of non-motorized users, creates a larger economic impact than the few hikers from rural areas.

Response: *2007 IMPLAN data was the most recent data at the time modeling was completed. Currently, the most recent data is 2008. There were no major changes to the economic base of the study area between those years that would warrant re-evaluation of alternatives with 2008*

data. The relative importance of economic impacts would not change as a result of updated the data. As long as the base year data is applied consistently across alternatives, it provides an accurate comparison of impacts between the proposed activities associated with those alternatives.

IMPLAN is the standard regional economic modeling data used by USDA Forest Service economists, and is accepted in Federal, private and academic studies. Spreadsheets developed by the USDA Forest Service to estimate the economic contribution of recreation is only compatible with IMPLAN data, therefore no other economic modeling data and/or software could be used.

37. The restrictive effects of the public's ability to use the forest and any proposed mitigation is not mentioned in the EA.

***Response**: The environmental consequences section of the socioeconomic specialist report (p. 16-27) addresses a variety of social and economic issues associated with the travel management plan, including the effects to use patterns and the associated economic and social impacts. However there is no data available that represents how use patterns would change across alternatives and therefore no quantitative social or economic impacts may be estimated. As a result, mitigation measures would be purely speculative since actual impacts are not estimated. The report includes a quantitative analysis of the economic contribution of existing recreation levels (socioeconomic specialist report, p. 19-22) and estimates response coefficients that explain the total economic contribution by thousand visits by activity type (socioeconomic specialist report, p. 18-19). However, for alternative comparison purposes, the report relies on a qualitative analysis of social and economic impacts due to limited data availability.*

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Fremont-Winema National Forests Motorized Travel Management Project

Non-Substantive Comments

Non-Substantive Comments: These comments provide an opinion or philosophical viewpoint not related to the action. They can be statements without any rationale that cannot be responded to or are resolved through regulation beyond the ability of the action to deal with.

Comments beyond the scope of the action

The following statements are non-substantive because the action cannot changed or provide the stated need.

Comments covered by regulation

1. **Access should not be limited without citizen vote**
2. **Does not like the Travel Management Rule**

Response*: Direction for these concerns is found in the Travel Management Rule. The decision is not a vote and is made by the Forest Supervisor after reviewing public comments and analysis summarized in the EA and project record, 36 CFR 220.7. The Travel Management Rule followed a public review and comment process prior to becoming established direction by the Forest Service. Comments about the Rule should have been made at that time. Since the Rule has now become regulation the Forest Service has to implement in order to comply with the law.*

3. **Include Tribal member usage as an exempt use from the Plan on Page 14 of the EA.**

Response**:** *The final Travel Management Rule does not have tribal implications as defined by E.O. 13175, Consultation and Coordination With Indian Tribal Governments. The only exemptions on page 14 of the EA were those included in the Rule.*

Comments not related to designating motorized routes, covered by the permit authorization, or cannot be substantiated

4. **Would like permitted access on some of the closed roads for specific management activities.**
5. **Forest resource sale and special uses need to be required to perform maintenance to not impact recreation use of the forest or develop improvements to be used for recreation.**
6. **Should allow free disposal of non-toxic waste on forest.**
7. **The problem with low deer numbers is lack of forest management and effective predator control.**
8. **Implementing the rule will cause an uprising of forest users.**

Response**:** *The Travel Management Rule provides an exemption for permitted activities such as resource management actions or special events.*

Response to Comments

Fremont-Winema National Forests Motorized Travel Management Project

Comments related to confusion about the action

9. Let the public use the Forest, it is their land
10. Do not close more roads
11. The plan seems deceptive. FS isn't opening 69 miles but closing 5,700 miles. This is difficult for the public to understand with the way the information and maps were presented. Providing the number of roads that will be closed would have been useful.
12. The impacts of the plan have not been clearly educated to the public

***Response**: The Implementation of the Travel Rule does not prohibit the public from using the Fremont-Winema National Forests. The Decision allows the motorized access to 6,600 miles of National Forest System roads and trails. Since the Travel Management Rule closes the Forest to off-road motorized travel, approximately 4,500 miles of Maintenance Level 1 road would no longer be available for motorized use. Approximately 980 miles of National Forest System roads are already closed by Code of Federal Regulation (CFR) closures. Maintenance Level 1 roads are roads closed to motorized use, being placed in storage for later resource management needs. The EA discloses the fact that off-road motorized use will no longer be allowed and the Forest Plans are being amended to clarify this new direction. The ability to no longer use motor vehicles cross-country by the public is the biggest impact to the forest user.*

13. Partnerships: Partnerships with our local motorized user groups were mentioned as a possible solution for maintenance needs, resource improvement projects, and for education.

***Response**: Partnerships are an important way to assist with the management of National Forest System lands.*

14. One commenter asked for snowmobile restrictions to reduce conflicts with non-motorized winter users of the forest and snowmobiles.

***Response**: This is outside the scope of the action dealing with the designation of motorized routes. Snowmobile use was not considered in this action.*