

Santa Fe National Forest Travel Management Planning

Content Analysis Methodology

April 9, 2009

The purpose of this document is to describe the process used by the Santa Fe National Forest's (Forest) Interdisciplinary Team (IDT) to receive and analyze the comments received during scoping.

The Forest published its Proposed Action for Managing Motorized Travel on July 10, 2008. The Notice of Intent to publish an Environmental Impact Statement appeared in the Federal Register on July 17, 2008. The 45-day scoping comment period started July 18, 2008 and ended September 2, 2008. The Forest, however, continues to accept comments on the proposed action. Most letters were sent by mid-September, with a few trickling in after then.

To date, the Forest received 1,287 individually written letters, mostly arriving via email. Organized groups sent 45 letters; the rest were from individuals. Forest staff identified six letters containing alternatives or suggestions for alternatives. The Forest also received six different petitions or form letters.

Methodology

The public sent letters to the forest's physical address, sftravelmgt@fs.fed.us, or comments-southwestern-santafe@fs.fed.us. Many people sent their comments to more than one address and to more than one person, such as a district ranger, the forest supervisor, and the IDT Leader. Forest staff gave every letter received a number, but generally analyzed duplicate copies for their content only once. Because the content of the petitions is the same, staff considered them as one comment received multiple times and analyzed the content only once. If a form letter contained a variation, it was analyzed as an individual letter.

The Forest keeps one clean copy of the original letters in two forms, electronically and as a hard copy. Staff made one hard working copy of each letter to use for analysis. Staff attempted to eliminate the duplicates in the working copies. Some duplicates remain due to the volume of letters received in a short period of time. These duplicates were analyzed twice for their content, and serve as a process check to ensure that reviewers picked up the correct content.

Forest staff developed a database to track the comments. The Forest developed a set of codes, attached here as Appendix 1. Staff read each letter, highlighting the specific comment(s) and giving it the code that best captures the content. We did our best to capture the each unique idea(s) presented by the author.

The IDT met all day one time per week beginning 11 September 2008 to read and analyze the comments. Appendix 2 lists the dates the team met and who participated in the content analysis. By performing content analysis as a team, we ensured that different perspectives would be captured.

Forest staff then put the highlighted comments in one of two databases: the general database or the site-specific database. The general database contains comments that could pertain to the whole forest. The site-specific database contains comments that were very specific to a district, for example those listing a specific road or trail.

General Comments

The general comments number approximately 2,420. They were sorted by code. The IDT then wrote one or more *public concern statements* summarizing the comments contained within that code. The IDT combined similar public concern statements, resulting in approximately 360 statements. The IDT used the 360 statements to identify significant issues; once these were identified the statements were further condensed to a more manageable number. The final public concern statements and the comments that fed into each will be available in the project record.

The IDT met on January 21, 2009 to identify the key, minor, and not relevant issues. We divided the public concern statements into four groups of about 90 comments each. The IDT broke into four small groups to decide whether the concern was a key issue, should be considered in the DEIS, or was not relevant.

- “Key issue” meant that the idea would be considered as a separate alternative or form the basis of mitigation. These issues would be carried forward in the analysis.
- “Consider in DEIS” (e.g., minor issue) meant the concern is something the IDT routinely considers, such as analyzing effects to wildlife, or should be included as part of the analysis, such as enforcement. These are not key issues, but would be carried forward in the analysis.
- “Not relevant” meant that the concern would not be carried forward in the analysis. It is an item that is not pertinent to the project.

The IDT discussed the potential key issues and decided on a final list to recommend to the Forest Supervisor. Appendix 3 contains the key issues as worded by the IDT at the meeting on 21 January 2009.

The IDT Leader re-wrote the statements in the form of cause-effect and presented them to the Steering Committee on 22 January 2009. Appendix 4 contains the significant issues as approved by the steering committee. The scoping report, which contains the minor and not relevant issues, will be available as a separate document in the project record.

Site-Specific Comments

The IDT sent the site-specific comments to the district they pertained to. Each district reviewed the site-specific comments to decide whether the suggestion could be a part of an alternative, or if it was not something that could be recommended under any scenario. The site-specific comments will likely be incorporated into one or more alternatives, unless deemed inappropriate under any scenario.

Written by Julie Bain

Appendix 1

Codes for Comments

Code	Category and subcategory
10	Process
100	Decision making process and methods
101	Decision making philosophy (how, not what, to decide)
102	Public involvement
103	Use of science / best available science
104	IDT composition
105	Consistency with other requirements
106	TAP
107	Influences on decision-making
108	Use of public comment (vote, majority, forms)
109	Adequacy / availability of information
110	Public meetings / hearing / outreach / education
111	Collaboration
112	Adequacy of comment period
113	Adequacy of entire timeframe
114	Maps
115	Web / technical issues
116	Legality
20	NEPA document
200	General
201	Purpose and need
202	Need for an EIS, EA
203	Technical and editorial (spelling, grammar, consistency)
204	Desired conditions
205	Goals, objectives, standards and guidelines
206	Alternatives
207	Alternative development / method / range
208	Alternatives not analyzed in detail
209	Alternatives developed by others
210	Suggestion for new alternative
211	Alternatives analyzed
212	Preferred alternative
213	No Action alternative
214	Forest Plan amendments
215	Effects Analysis
30	Roads

300	Change designation
301	Change season of use
302	Change vehicle class allowed
303	More access needed
304	Less access needed
305	Safety
306	User conflicts
307	Maintenance
308	Engineering
309	Resource issue
310	Concentration of use
311	Signs
312	Agree with designation
40	Trails
400	Change designation
401	Change season of use
402	Change vehicle class allowed
403	More access needed
404	Less access needed
405	Technical variety
406	Loops
407	Safety
408	User conflicts
409	Maintenance
410	Engineering
411	Resource issue
412	Concentration of use
413	Inventoried roadless areas
414	Signs
415	Agree with designation

50	Areas
500	Change designation
501	Change season of use
502	Change vehicle class allowed
503	More areas needed
504	Fewer areas needed
505	Safety
506	User conflicts
507	Maintenance
508	Engineering
509	Resource issue
510	Signs
511	Agree with designation
60	Dispersed camping
600	More access needed
601	Less access needed
602	Enforcement
603	De-facto "area"
604	Methodology for selecting
605	Resource issues
606	Corridor size
607	Access v. site designation
608	Other camping opportunities
609	Concentration of use
610	Signs
611	Continued access
612	User conflicts
613	Safety
614	Maintenance
615	Engineering
616	Concentration of use
617	Resource Issue
618	Inventoried Roadless Areas

70	Hunting / Big Game Retrieval
700	More access needed (hunting)
701	Less access needed (hunting)
702	Enforcement
703	De-facto "area"
704	Methodology for selecting
705	Resource issues
706	Corridor size
707	Seasonal motorized use
708	Support proposal
709	More access needed (big game retrieval)
710	Less access needed (big game retrieval)
711	Safety
80	Private Land
800	Change designation
801	Change season of use
802	Change vehicle class allowed
803	Right of access
804	Easement
805	Road use association
806	Maintenance
807	Resource issues
808	Trespass
90	Forest products (including firewood) and grazing
900	More access needed
901	Less access needed
902	Permits
903	Concentration of use
904	Resource issues
905	Continued access

100	Resource issues
1000	Wildlife - general
1001	Wildlife – threatened and endangered
1002	Soils
1003	Water quality
1004	Riparian
1005	Heritage resources
1006	Fisheries /aquatic
1007	Wildfire potential
1008	Vegetation
1009	Air quality
1010	Global warming
1011	Multiple concerns
110	Wilderness / non-motorized / IRAs
1100	Trespass
1101	Routes leading to or close to wilderness / non-motorized
1102	Noise
1103	Resource issues
1104	User conflicts
120	Social / Economic
1200	Noise
1201	Trash
1202	Illegal / nuisance uses
1203	Tourism
1204	Out-of-state or out-of-area visitors
1205	Economic benefit
1206	Property value
1207	Disabled / Handicap
1208	Traditional Uses

130	Implementation
1300	Enforcement
1301	Monitoring
1302	Signage
1303	Use of motor vehicle use map
1304	Fines / deterrents
1305	Licensing / special requirements
1306	Volunteers
1307	Physical closures
1308	Education
1309	Engineering
1310	Funding
140	General
1400	Resource management
1401	Supports proposed action
1402	Against proposed action
1403	Wants reduced motorized access
1404	Wants increased motorized access
1405	Safety
1406	Dislikes OHVs / motor vehicles
1407	Favors OHVs / motor vehicles
1408	OK with shared use
1409	Opposed to shared use
1410	User Conflict

Reason brought forward:

1	Address during analysis routinely conducted by IDT
2	Address through alternative design
3	Address through implementation of project-specific design criteria and mitigation measures

Reason not brought forward:

4	Already part of the proposed action
5	Addressed through implementation of Forest Plan standards, guidelines, or BMPs
6	Already decided by law, regulation, or policy
7	Beyond the scope of the project
8	Describes an effect of No Action
9	Does not meet the purpose and need
10	Irrelevant to decision
11	Limited in extent, duration, and intensity
12	Misunderstanding of the NEPA process
13	Not supported by scientific evidence
14	“Vote” rather than an issue or concern
15	Opinion
21	Request for information

Sent to District:

16	Coyote
17	Cuba
18	Jemez
19	Pecos / Las Vegas
20	Española

Appendix 2

Santa Fe Travel Management Planning Dates and team members present for content analysis

September 11, 2008: Charlie Gobar, Julie Luetzelschwab, Chantel Cook, John Dixon, Estevan Gonzales, Mike Bremer, Julie Bain

September 17, 2008: Charlie Gobar, Debby Serrano, Estevan Gonzales, Diane Taliaferro, James Gachupin, Helen Pruitt, Julie Bain

September 24, 2008: Mike Dechter, John Phillips, James Munoz, Julie Luetzelschwab, Miles Standish, David Allen, Diane Taliaferro, Jeremy Kulisheck, Estevan Gonzales, John Dixon, Julie Bain

October 1, 2008: Charlie Gobar, Mike Dechter, Julie Luetzelschwab, Annie Apodaca, Jessie Scott, Estevan Gonzales, John Phillips, Diane Taliaferro, Kiernan Holliday

October 8, 2008: Annie Apodaca, Mike Dechter, Amanda Webb, David Allen, James Munoz, Julie Luetzelschwab, Sera Naegele, Jeremy Kulisheck, Charlie Gobar, Estevan Gonzales, John Dixon, Chantel Cook, Julie Bain

October 15, 2008: Charlie Gobar, John Dixon, Mike Dechter, Julie Luetzelschwab, Estevan Gonzales, Julie Bain

People who wrote public concern statements:

Estevan Gonzales, Mike Bremer, Charlie Gobar, Kiernan Holliday, Chantel Cook, Julie Bain

Appendix 3

Key Issues identified by the Travel Management IDT on 21 January 2009

Motorized use of routes and areas affects wildlife, fish, and plants.

Motorized use of routes and areas affects soil function and water quality.

The amount and configuration of designated routes affects access to and condition of cultural resources.

The amount and configuration of routes and areas affects recreational opportunity and experience.

The amount and configuration of designated routes affects access to and condition of culturally valued resources.

Motorized use affects enforcement as it relates to safety, user-conflicts, and protection of forest resources.

The amount and configuration of designated routes affects the ability to maintain them.

The amount and configuration of designated routes affects hunting opportunities, game retrieval, and forest product collection.

Appendix 4

Key Issues as approved by the Steering Committee

1. Public motorized use of routes and areas described in the proposed action will adversely affect forest resources. This includes:

Erosion, soil compaction, and degradation of water quality;
Degradation of fish and wildlife habitat;
Damage to heritage resources;
Damage to rare plants; and
Compromising the character of wilderness and inventoried roadless areas.

2. The reduction in miles of routes and the prohibition of cross-country travel as described in the proposed action is not justified. The adverse effects to forest resources are not scientifically based or field verified and are over-estimated.

3. The reduction in miles of routes and the prohibition of cross-country travel described in the proposed action will adversely affect the quality and quantity of public motorized experiences because it:

Lacks enough loops and connectors to provide longer rides;
Lacks diverse opportunities for ATVs, motorcycles, and 4x4s;
Lacks diverse routes for different skill levels;
Does not provide enough area for motorcycle trials;
Closes too many routes, which will concentrate use and take away the semi-primitive aspect of riding in the forest;
Does not plan for the future growth in motorized sports; and
Does not allow for sufficient subsistence use, like game retrieval.

4. The proposed action detracts from non-motorized experiences in the forest because it allows too much public motorized access, resulting in excessive noise and dust and decreasing the safety of non-motorized users.
5. The proposed action, by designating specific motorized access to dispersed camping, will concentrate use, take away the semi-primitive experience of camping, prevent people from driving to their favorite spot to camp, and remove the freedom associated with recreating on the national forest.
6. The proposed action allows too much motorized access to dispersed camping. It designates access too close to private property, which encourages trespass and vandalism. The designation of corridors encourages motorized cross-country travel, which damages natural and cultural resources.

The steering committee considered the following issues, identified as potential key issues by the IDT, as minor issues. The reason for their decision follows each statement.

7. The motor vehicle use map alone will be an inadequate enforcement tool and people will not comply with it, resulting in unauthorized motorized use that will damage forest resources, create user-conflicts, and decrease safety for non-motorized users.

The issue here is *enforcement*. The IDT will explore the potential of having a stand-alone alternative addressing enforcement; however, the preliminary belief is that such an alternative is not likely to meet the purpose and need of the project. Instead, enforcement would be woven into each of the alternatives. It is also likely to be a measure.

8. Any reasonable designated motorized system will require more maintenance than the Forest Service can provide by itself. An unmaintained system will continue to adversely affect forest resources.

Maintenance is not considered a key issue because the Forest Service will meet its maintenance obligations for each action alternative proposed; all the action alternatives will be crafted so that maintenance obligations can be achieved.

9. Not including motorized trails in the forest's open road density standards, and not including all routes whether open or closed in the standards, is not protective of forest resources. The current open road density standards in the forest plan are too high and do not protect forest resources.

The issue of *road density*, what to include and how it is calculated, applies to all of the alternatives. Once the Forest has decided how to address open road density, it will be applied across all the alternatives in the same way. Road density is a corollary (and forest planning) issue to designating motorized routes and trails, rather than a key issue that would drive its own alternative.

The IDT had identified the collection of forest products and the ability to retrieve downed big game as a potential key issue. The collection of forest products will be handled through the permitting process. The collection of downed big game was considered to be an issue related to access, and was included with key issue #3.

Additional minor issues were subsequently identified from the public concern statements.