Appendix B. Response to Comments

You can search this appendix for individual comments using the “Find” application to search on the assigned letter number. Appendix C contains an alphabetical list of commenters and their corresponding letter number. Using the letter number from appendix C, type the letter number into the “Find” application window to search the appendix.

The following acronyms are used in appendix B.

Acronym	***Definition***
APE	Area of potential effect
ARPA	Archaeological Resources Protection Act of 1979
AS or A/S	Apache-Sitgreaves National Forests
AZ	Arizona
BMPs	Best management practices
CDNST	Continental Divide National Scenic Trail
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DEIS	Draft environmental impact statement
DN	Decision notice
E.O.	Executive order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEIS	Final environmental impact statement
FONSI	Finding of no significant impact
GIS	Geographic Information System
GNF	Gila National Forest
GPS	Global Positioning System
IRA	Inventoried roadless area
MBGR	Motorized big game retrieval
MDC	Motorized dispersed camping
MIS	Management indicator species
MUSY	Multiple-Use Sustained-Yield Act of 1960
MVUM	Motor vehicle use map
NAGPRA	National American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act

NF	National Forest
NFMA	National Forest Management Act of 1976
NFS	National Forest System
NHPA	National Historic Preservation Act of 1966
NM	New Mexico
NMDGF	New Mexico Department of Game and Fish
NMED	New Mexico Environment Department
NNHPD-TCP	Navajo Nation Historic Preservation Department - Traditional Culture Program
NRHP	National Register of Historic Places
NVUM	National Visitor Use Monitoring Report
OHV	Off-highway vehicle
OML	Operational Maintenance Level
ORV	Off-road vehicle
PA	Programmatic Agreement
ROS	Recreation Opportunity Spectrum
SHPO	State Historic Preservation Officer
TAP	Travel Analysis Plan
TES	Threatened and endangered species
TIS	Travel Information System
TM	Travel management
TMP	Travel Management Plan
TMR	Travel Management Rule
USDA	United States Department of Agriculture
USFS	U.S. Forest Service
USFWS	United States Fish and Wildlife Service
WSA	Wilderness Study Area

Administrative Uses and Lands

Letter/ Comment #	Summary Statement	Administrative Use - Response to Comments
03022011-32-15 03072011-63-4 03072011-71-1 03072011-78-57/62a/107 03072011-96-9 03072011-151-2	Feel that forest management activities such as timber, grazing, fuel reduction projects and riparian and watershed projects would be restricted with implementation of Travel Management Rule.	If a written authorization for activities such as grazing or timber harvest specifically provides for motor vehicle use, that use is exempted from designations and prohibitions regarding motor vehicle use and may continue. Local Forest Service authorities retain the authority to regulate uses under written authorization and to what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use (Federal Register, Vol. 70, No. 216, page 68264). Activities under written authorization are exempt under 36 CFR §212.51(a)(8) from the designations. The roads proposed to be closed to motor vehicle use within the alternative selected in the Record of Decision will have to go through a further evaluation and assessment to determine the level of closure (i.e., berms, gates, etc.) or be decommissioned. Future forest projects will include planning and assessing access needs for motor vehicle use. If motorized routes are needed for a project, they would be subject to site-specific environmental analysis. Consideration for including in the designated route system will depend on the result of the local decisions.
03042011-01-1	The GNF proposed TMP does not address the potential effects that livestock grazing related cross-country travel will have.	Motorized vehicle use authorized under grazing permits is a current activity, and would continue under all alternatives. If a written authorization for activities specifically provides for motor vehicle use, that use is exempted from designations and prohibitions regarding motor vehicle use and may continue. Local Forest Service authorities retain the authority to regulate uses under written authorization and to what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use (Federal Register, Vol. 70, No. 216, page 68264).
03042011-11-4 03042011-20-5 03072011-12-1	Mining - Access to productive recreational gold prospecting areas is quite limited and in the event of road closures these limited opportunities will be cut even further.	Mineral deposits within the Gila National Forest remain open to exploration, with restrictions. The Department agrees that motor vehicle use that is specifically authorized under written authorization issued under Federal law or regulations should be exempted from designations made under 36 CFR 212.51 (Federal Register, Vol. 70, No. 216, page 68284). If a written authorization for activities such as mining specifically provides for motor vehicle use, that use is exempted from designations and prohibitions regarding motor vehicle use and may continue. Local Forest Service authorities retain the authority to regulate uses under written authorization and to what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use (Federal Register, Vol. 70, No. 216, page 68264).

Letter/ Comment #	Summary Statement	Administrative Use - Response to Comments
		When the DEIS was released, the forest provided a handout on “Exemptions and Written Authorizations.” One of the sections covered *Mining access via roads* and provided the following points: Because this activity is exempt from the Travel Management Rule, no proposal or decision will be made in the NEPA analysis associated with implementing the Travel Management Rule. If motor vehicle access on a closed road is requested in order to conduct mining related work, the effects to various resources would be disclosed as part of the environmental analysis decision process associated with approval of a mineral plan of operation. If motor vehicle use is approved, this use would be specifically authorized under a mineral plan of operation. The approved mineral plan of operation would serve as the written authorization.
01152011-40-1	Special use fees related to access to private land is too expensive.	The cost of special use fees for access roads is outside the scope of this project.
02072011-02-5 03022011-15-33/34 03032011-16-2 03072011-78-37	DEIS does not disclose the methodology and rational for proposing designation across private property or closure of roads if multiple roads access the property.	The TMR requires responsible officials to recognize rights of access in designating roads, trails, and areas (36 CFR Part 215.55(d)). Rights of access include valid existing rights and rights of use of NFS roads and NFS trails (36 CFR Part 212.6(b)). The TMR does not affect reciprocal rights-of-way between the Forest Service and private landowners. The Forest has attempted to not designate roads across private lands for which there is no acquired easement or right-of-way. However, there are instances where jurisdiction remains unresolved and public access has not been ruled out with certainty, and therefore, motorized through private land is displayed. Where multiple roads access private lands, the Forest is only required to provide reasonable access to private lands. Also, the Forest considered comments from landowners recommending closure of roads that led to their property. Examples include trespass, not primary access to property, gates being left open, and impacts to private land resources.
02082011-01-2 03052011-36-4 03072011-164-4	Concern that Forest areas are blocked by private land and locked gates.	This is outside the scope of this project. The forest recognizes this as an issue and the Forest Service seeks, wherever possible, to secure or retain public access to Federal lands by purchasing or exchanging rights-of-way and reserving rights-of-way in land exchanges.

Letter/ Comment #	Summary Statement	Administrative Use - Response to Comments
03062011-25-2	Concern with difference in treatment of roads leading to private land that some considered for administrative and other open to all motor vehicles.	The treatment of roads leading to private land was based on consideration of factors such as existing easement or right-of-way through the private land; public input; landowner input; Forest staff knowledge of the area; length of the road; adequate space to allow vehicles or vehicles with trailers to turn around before or near the private land; need for public access; and does the road just serve as access to the private land.
03072011-24-6	Concern that Forest is closing roads beyond private lands that are being accessed by public.	The access across private lands to existing roads has been an issue for the Forest for some time. The Forest does not have a legal right-of-way or authority to cross some parcels of property to the National Forest System roads on the opposite side. It is known that landowners do allow individuals to cross, but not all individuals have been allowed access. Where the Forest cannot ensure consistent public access some road systems beyond private lands are proposed closed. The Forest will continue to seek, wherever possible, to secure or retain public access to Federal lands.
03072011-78-107	The "written permission" stipulation is illegal. The DEIS sets forth no standards for how anyone can get this special permission. This is the essence of arbitrary and capricious, since these roads are presently open. If this special permission clause is left in place, any "responsible official" could choose to deny access based on any reason.	The TMR provides for written authorization of access. The rule at 36 CFR 212.51(a) (4) and (8) exempts limited administrative use by the Forest Service and use specifically authorized under a written authorization issued under Federal law or regulations. Local Forest Service authorities retain the authority to regulate uses under written authorization and to what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use.

Air Quality

Letter Number	Summary Statement	Air Quality - Response to Comments
01082011-06-7	Forest Service needs to manage for Fine Particulate Matter from smoke produced by prescribed fires into the future.	Thank you for your comment. Prescribed fires and smoke management are outside the scope of this project.
01192011-02-12	DEIS states under air quality that no adverse impacts are anticipated with selection of any of the alternatives, thus it is not a driver to support the decisions being made.	Thank you for your comment. The air quality specialist report examines relative risk related to direct, indirect, and cumulative impacts of each action alternative as required under NEPA. "The primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives (CEQ Regulations Section 1502.1 NEPA). Air quality was one of many resource areas identified as a concern, and therefore, was analyzed to display effects of the issues and alternatives.
03042011-19-3	Activities such as demolition, construction, rehabilitation, repair, dredging and filling have potential to emit air pollutants. It is recommended that work be conducted in accordance with best management practices and applicable statues and regulations.	Thank you for your comment. These or similar activities are not proposed under any of the action alternatives. If such activities are proposed on the forest, appropriate measures and regulations would be considered to minimize effects of the activities on air quality.
03042011-30-7	Route use and vehicle emissions causes increase in air pollution.	It is unknown whether increased traffic, increased air pollution and/or increased OHV emissions will occur forestwide as a result of designating motorized travel routes on National Forest System lands. The air quality analysis did not evaluate use levels as these data were unavailable.

Letter Number	Summary Statement	Air Quality - Response to Comments
03042011-30-8 03072011-21-130b	Forest Service should address the impact of fugitive dust on vegetation.	The draft air quality specialist report mentions impacts to vegetation caused by air pollution on page 26. The final report will be updated with further discussion of impacts to vegetation from fugitive dust.
03072011-21-129a 03072011-21-132	Analysis does not address impacts of fugitive dust on snowpack.	Thank you for your comment. The analysis did not mention impacts of fugitive dust on snowpack. A discussion of this will be updated in the air quality specialist report.
03072011-21-129b	Assumptions are flawed that minimal dust results from motorized use in corridors related to camping and MBGR. Analysis should address this.	Agree with the commenter that camping corridors and motorized big game retrieval corridors would see more vehicle traffic than parts of the forest that are not open to motorized travel. While fugitive dust impacts are minimal in many areas, they are likely higher in camping areas. The air quality specialist report will be updated to analyze potential impacts within camping corridors and motorized big game retrieval corridors.
03072011-21-129c	Analysis fails to quantify the amount of fugitive dust that could result from routes, corridors and areas. Forest should obtain or estimate traffic volumes to do this analysis.	Traffic volumes are not available for the forest and estimating the number of vehicles, the speed of vehicles, the weight of vehicles, and other information required for modeling fugitive dust emissions is cost prohibitive and time consuming to be practical for this analysis. Additionally, to make the assumptions needed to model fugitive dust emissions would likely result in an unacceptable amount of uncertainty in the results.
03072011-21-130a	Forest should consider impacts of fugitive dust on human health.	The draft air quality specialist report, page 26, includes a discussion of air quality impacts on human health.
03072011-21-131a	Forest may not permit activities that will result in exceedance of national ambient air quality standards and must protect current status of AQRVs.	This project does not propose to conduct activities that will result in exceedances of National Ambient Air Quality Standards, or other air quality standards.

Letter Number	Summary Statement	Air Quality - Response to Comments
03072011-21-131b	Forest Service must accurately describe baseline air quality conditions. Agency must prepare a comprehensive emissions inventory, including fugitive dust emissions, and model these in a near-field, far-field and cumulative analysis to know if complying with state and federal standards.	The air quality specialist report tables will be updated to include nearby monitoring data (from New Mexico Environmental Department (NMED) and Environmental Protection Agency (EPA)) to clearly illustrate that the area is in attainment. These tables also quantify the baseline air quality by showing monitored pollutant concentrations.

Alternatives

Letter Number	Summary Statement	Alternatives - Response to Comments
01192011-02-44 02132011-01-3 03062011-05-1	No rationale or reason for alternative G being the preferred alternative.	Under NEPA §1502.14, the Gila National Forest is to identify the agency's preferred alternative in the draft environmental impact statement. The Forest Supervisor selects the preferred alternative for the agencies and public to understand the agency's orientation on the project. Providing the preferred alternative in the DEIS may be a tool to assist some of the public in forming comments by using it to compare or contrast to other alternatives. Richard Markley, former Forest Supervisor, had selected Alternative G as the preferred alternative because he believed it would fulfill its statutory mission and responsibilities of implementing the Travel Management Rule. The selection of the "preferred alternative" for the DEIS is not a decision. The selection of an alternative is documented in the Record of Decision (ROD).
02072011-06-3 03072011-21-48/50 03072011-50-2 03072011-78-13/27/80/81/115a 03072011-120-7/9	The range of alternatives is not broad enough.	Comments generated from scoping centered around four issues: motorized routes, motorized dispersed camping, motorized big game retrieval, and motorized areas (final approved 7/30/2010). The alternatives within the DEIS meet the stated purpose and need. The final reasonable range of alternatives was approved by the Forest Supervisor on 7/30/2010. This project could have a number and combination of elements related to the issues identified from scoping resulting in there being a large number of possible alternatives. The Forest feels the approved alternatives cover a spectrum of possible alternatives which meet the purpose and need and the Travel Management Rule. Alternative C provides the most motorized opportunities with very little change in roads open to motor vehicle use and increases motorized trails for both ATV (vehicles less than 50 inches in width) and motorcycles. Compared to alternative E, which reduces the roads open to motor vehicle use by almost 50 percent and minimally includes any unauthorized or decommissioned routes or maintenance level 1 closed roads. The other alternatives fall between those two.
03072011-120-4	The Forest should be looking at a way to create a system that works for all users, as opposed to creating minimal opportunities. The alternatives developed	The purpose of the travel management plan is to designate a system of roads, trails, and areas open for motorized use. It is not to develop a comprehensive off-highway vehicle plan for ATV and single-track recreational experiences nor is it a plan to develop changes to non-motorized recreation trails or other opportunities. An effort could be considered in the future, with appropriate analysis that would consider a plan for those specific types of activities. Alternatives to the proposed action were developed to address significant issues identified from

Letter Number	Summary Statement	Alternatives - Response to Comments
	indicate apparent strategy to simply designate motorized routes and produce an MVUM, rather than take a comprehensive look at enhancing a balanced set of recreation opportunities for all users.	public comments. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The Forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.

Alternative B

Letter Number	Summary Statement	Alternative B - Response to Comments
01132011-09-1 01152011-18-1 01182011-04-2/3 02112011-01-4/5/7 02032011-02-1 02072011-03-1 02132011-01-1/2 02262011-09-4/6 03022011-28-1 03032011-05-1 03042011-11-1 03052011-046-1 03072011-39-2/4 03072011-52-2 03072011-64-2 03072011-90-3 03072011-104-2 03072011-145-1/2/3/4 03072011-150-1a	Desire to implement Alternative B there are no problems, no cost to leave as is and does not limit public access or use. Other alternatives too restrictive and reduces recreational opportunities.	The intent of the forest is to provide access for both motorized and nonmotorized users in a manner that is environmentally sustainable over the long term. As stated in the Travel Management Rule, national forests are managed by law for multiple use. However, the magnitude and intensity of motor vehicle use have increased to the point that the purpose and need cannot be met while still allowing unrestricted cross-country travel. Soil erosion, water quality, and wildlife habitat are being adversely affected. See the resource effects analyses in chapter 3 of the DEIS. The agency must comply with laws and regulations, including those protecting water and endangered species. The action alternatives present a range of options that consider both the need for access and for resource protection. See response to comment 02132011-01-4 regarding concentration of use.
01152011-05-3 01292011-09-2	Oppose the selection of alternative B. Forest	Thank you for your comment.

Letter Number	Summary Statement	Alternative B - Response to Comments
03062011-04-5	resources need to be protected.	There are differing opinions regarding which alternative the Forest Supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
01152011-12-1 01152011-19-1 02042011-03-1 02072011-04-1 02072011-05-1 02152011-02-1 02162011-01-1 02162011-06-1 02212011-01-2 02222011-03-1 02232011-03-1 02242011-05-1 02282011-05-1 03012011-05-3 03032011-12-2/3 03042011-08-4 03042011-16-7 03042011-26-4 03052011-06-1 03052011-35-11 03052011-37-1 03052011-38-1 03062011-01-4 03062011-07-2/7 03062011-50-3 03072011-16-1 03072011-([16-001] to [16-662])-1 03072011-102-1 03072011-117-1 03072011-125-1 03072011-127-1	Desire to implement, select, support, or 'vote' for alternative B. 36 CFR 212.50 does not "require" road closures.	Thank you for your comment. There are differing opinions regarding which alternative the Forest Supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The purpose of 36 CFR 212.50 "provides for a system of National Forest System roads, National Forest System trails, and areas on National Forest System lands that are designated for motor vehicle use. Under 36 CFR 212.55 there are Criteria for designation of roads, trails, and areas and states: *General criteria for designation of National Forest System roads, National Forest System trails, and areas on National Forest System lands.* In designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration. Issues identified during public scoping generated alternatives that looked at varying amounts of miles of road proposed closed to motor vehicle use.

Letter Number	Summary Statement	Alternative B - Response to Comments
03072011-128-1 03072011-130-1 03072011-150-1 03072011-164-3 03072011-214-1 03072011-(0236 to 0255)-1 03072011-(0276 to 0373)-1		
01192011-02-45/49 01202011-03-2/3	Prefers alternative B with other alternative proposed routes but control cross-country travel to curtail unauthorized road development and protect habitat.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
02132011-01-4 02262011-04-1 02282011-07-1 03022011-14-1 03022011-32-14 03042011-20-2 03042011-33-2/4 03042011-50-1a 03052011-34-1 03052011-36-2/3 03062011-49-6 03072011-28-1 03072011-78-71/95 03072011-86-4 03072011-90-1 03072011-96-1/2 03072011-104-3 03072011-145-5 03072011-174-3	Select alternative B. The reduction of motorized roads, trails and areas on the forest will confine or concentrate use to a smaller area and will result in damage to the forest.	36 CFR 212.51(a) requires every National Forest and National Grassland to designate a system of National Forest System (NFS) roads, NFS trails, and areas on NFS lands for motor vehicle use. Once the designations are made, motor vehicle use off designated roads and trails and outside designated areas (i.e., motorized cross- country travel) will be prohibited by 36 CFR 261.13. To comply with the Travel Management Rule (TMR) the Forest must designate a system of NFS roads, NFS trails, and areas on NFS lands for motor vehicle use. There is a need to comply with 36 CFR 212.51(a). Allowing motor vehicle travel as it is currently occurring under Alternative B would not comply with the TMR. One of the exemptions to the prohibition on motor vehicle travel off designated roads, trails, and areas, i.e. cross-country travel, allowed by the TMR is motor vehicle use for dispersed camping and big game retrieval. The TMR says the responsible official may allow the “limited use of a motor vehicle within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51 (b)). In recognition of this regulatory direction, the draft environmental impact statement (DEIS) proposes to designate under alternatives C, D, F and G, a 300-foot corridor on both sides of specifically designated roads where visitors may take a motor vehicle for the purposes of motorized dispersed camping. In designating such corridors, every opportunity was taken to include areas and sites where historical and current camping use is occurring. Corridors for motorized access for

Letter Number	Summary Statement	Alternative B - Response to Comments
		dispersed camping are meant solely for that purpose. The NFS roads not proposed in motorized access camping corridors in the various alternatives were excluded to protect cultural and historical resources, critical and important wildlife and fish habitat, riparian areas, soils, water and vegetation. These corridors are restricted to that needed for direct ingress and egress to the camping spot that would become the base of activity. Where there are no designated motorized dispersed camping corridors, it does not eliminate the ability to disperse camp along and away from roads. Page 16 of the DEIS describes parking and dispersed camping: *Dispersed camping, such as tent camping, may occur anywhere on the forest. Riding horses and hiking to access a campsite is allowed anywhere on the forest. Parking for this type of dispersed camping may occur along any designated open road. Parking would be limited to one vehicle length, including any towed trailer, from the side of the road. Parking should occur where it is safe to park, does not cause resource damage (e.g., ruts), or is not already restricted.* Alternatives C, F, and G propose the designation of 37 areas consisting of 30.2 acres where all motor vehicle classes may be allowed to travel. These areas have been traditionally used for dispersed camping and are proposed to be open to all classes of vehicle use with the assumption that motorized access for dispersed camping at traditional sites will continue. One additional area is proposed to be open to ATV and motorcycle traffic only on the Reserve Ranger District. The DEIS analyzed the effects of implementing five action alternatives for designating NFS roads, NFS trails and areas on NFS lands for motor vehicle use. Chapter 3 of the DEIS summarized the physical, biological, social, and economic environments of the project area and the effects of implementing each alternative on that environment.
03022011-32-14a 03072011-96-9	The reduction of motorized roads, trails and areas on the forest will confine or concentrate use to a smaller area and will result in negative impacts to range resources.	Range improvements (especially waters) have been high impact areas by use from livestock wildlife and hunters or campers most likely for many years. Although these impacts could increase by additional recreationists, especially campers with horses, they have already been hardened by past use. Soils and vegetation have been altered by all these past uses in the vicinity of range improvements, so additional negative effects would be negligible. Livestock or wildlife well-being and distribution would not be affected as the necessity for water would prevail and additionally they would not be restricted to the same area if other waters are available.
01152011-13-1 01152011-58-1/3 01192011-02-6 02072011-03-3	Prefers alternative B or no change and desires enforcement of current rules and regulations related to	Forest Service regulations at 36 CFR part 212 governing administration of the forest transportation system, and regulations at 36 CFR part 295 governing use of motor vehicles off National Forest System roads are combined and clarified in the Travel Management Rule, covering the use of motor vehicles on NFS lands. These regulations implement Executive Order (E.O.) 11644

Letter Number	Summary Statement	Alternative B - Response to Comments
02072011-04-1a 02072011-05-1a 03012011-14-1 03042011-09-2 03042011-20-10 03052011-35-2 03062011-01-2 03062011-46-2 03062011-49-5 03072011-19-4 03072011-33-1 03072011-107-1 03062011-41-1	impacts of motor vehicles on the forest.	(February 8, 1972) as amended by E.O. 11989 May 24, 1977. These executive orders direct Federal agencies to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. Forest Service law enforcement personnel play a critical role in ensuring compliance with laws and regulations, protecting public safety, and protecting national forest resources. The Forest Service also maintains cooperative relationships with other law enforcement agencies. Education and cooperative relationships with user support improve enforcement efforts by promoting voluntary compliance. Outreach, education, and time are fundamental for implementing changes in travel management.
01072011-24-1 01092011-04-1 01102011-07-1 01132011-03-1 01132011-04-1 01132011-05-1 01132011-06-1 01132011-07-1 01132011-10-1 01132011-12-1 01152011-07-1 01152011-29-1 01182011-07-1 01182011-08-1 01252011-01-1/2 02012011-01-1 02072011-07-1 02132011-01-7 02232011-01-1 02232011-02-1 02242011-02-1 02242011-03-1	Opposed to changes or road closures, supports alternative B. This includes no changes to the current motorized use on the 'road system' or forest. There are currently adequate acreages of Wilderness and Inventories Roadless Areas (IRAs) available to meet needs of those preferring non-motorized activities. Non-Wilderness areas should feature motorized activities.	Thank you for your comment. There are differing opinions regarding which alternative the Forest Supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. One of the purpose and needs for this project is to bring the forest into compliance with the 2005 Travel Management Rule. The Travel Management Rule directs the Forest Service to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote safety of all users of those lands, and to minimize conflicts among the various uses of those lands. We recognize that motor vehicle access opportunities are important, and are a legitimate and appropriate way for people to enjoy the Gila National Forest in the right places, with proper management. 36 CFR 212.51(a) requires every National Forest and National Grassland to designate a system of National Forest System (NFS) roads, NFS trails, and areas on NFS lands for motor vehicle use. Once the designations are made, motor vehicle use off designated roads and trails and outside designated areas (i.e., motorized cross- country travel) will be prohibited by 36 CFR 261.13. To comply with the Travel Management Rule the forest must designate a system of NFS roads, NFS trails and areas on NFS lands for motor vehicle use. Allowing motor vehicle travel as it is currently occurring as displayed in alternative B would not comply with the Travel Management Rule. The draft environmental impact statement (DEIS) analyzes the effects of implementing five action

Letter Number	Summary Statement	Alternative B - Response to Comments
02252011-01-1 02252011-04-1 02282011-11-1/3 03012011-04-1 03012011-06-1 03012011-10-1 03022011-10-1 03022011-12-1 03022011-13-1 03022011-14-2 03032011-07-1 03032011-18-1 03032011-21-1 03042011-20-1/8 03042011-22-1 03042011-27-1 03042011-33-1 03042011-40-1 03042011-43-1 03042011-49-1/3 03042011-50-1b 03042011-56-1 03052011-12-1 03052011-14-1 03052011-16-1 03052011-34-3 03052011-36-1 03062011-07-6 03062011-16-1 03062011-19-1 03062011-26-1 03062011-40-1 03062011-49-1b 03062011-50-4 03072011-09-1 03072011-11-3		alternatives and the no action alternative. Under the no action alternative, there would be no changes to the motorized system and cross-country travel by motor vehicle would continue to be allowed. This does not meet the requirements of the Travel Management Rule which we are obligated to implement. The no action alternative is required by 40 CFR 1502.14(d) and is presented to provide a baseline for comparison of effects of the alternatives. Currently, motor vehicles may travel on a little over 4,600 miles of road and almost 16 miles of motorized trails. In addition, motor vehicles may travel cross-country except in wilderness areas and within certain management areas where specifically closed. Approximately 2.4 million acres are open to cross country motor vehicle travel. Though we manage forest for multiple uses, the law does not require that we allow people to drive anywhere they want to on the forest. Our responsibility is to allow use of the forest, but at the same time protect resources. The Travel Management Rule repeatedly emphasizes this concept. The Forest Service is preserving many existing motorized opportunities, but at the same time, we have a responsibility to protect forest resources. We have considered many different things to arrive at our alternatives during this process. Regardless of the alternative we choose, people will still be allowed to engage in their favorite activities on the forest, however, activities involving motor vehicles will be regulated in compliance with the Travel Management Rule.

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03072011-14-1 03072011-24-2 03072011-26-3 03072011-29-1 03072011-38-1 03072011-41-1 03072011-44-1 03072011-49-1/2 03072011-55-1 03072011-63-1 03072011-66-1 03072011-82-1 03072011-83-1 03072011-84-1 03072011-85-1 03072011-86-1 03072011-88-1 03072011-89-5 03072011-90-5/6 03072011-100-1 03072011-104-1a 03072011-115-1a 03072011-145-4 03072011-147-1 03072011-149-1 03072011-190-1 03072011-217-1		

Alternative C

Letter Number	Summary Statement	Alternative C - Response to Comments
01152011-01-1 01152011-10-1 01152011-41-1	Desire to implement or select alternative C. Alternative maintains current	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and

Letter Number	Summary Statement	Alternative C - Response to Comments
01152011-54-1 01152011-55-1 02032011-02-2 02072011-01-1 02212011-02-1 02262011-06-1 02262011-07-1 03022011-02-3 03042011-08-3 03072011-126-4 03072011-140-1 03072011-141-1	camping, road miles and access. Alternative proposes motorcycle trails.	public input. Alternative C is similar to B in miles of motor vehicle opportunities. Alternative C increases designated miles of motorized trails for ATVs and motorcycles. In compliance with the Travel Management rule, unlimited cross-country is eliminated.

Alternative D

Letter Number	Summary Statement	Alternative D - Response to Comments
01092011-02-2 01122011-05-1a 01152011-11-1 01152011-20-1 01152011-21-1 01152011-35-1 01152011-37-1 01152011-49-1 01152011-61-1 01182011-02-1 02012011-03-1/2 02052011-01-1 03042011-47-1 03052011-11-1 03072011-56-4 03072011-146-2 03072011-210-1	Desire to implement or select Alternative D. Alternative protects resources and reduces, but still provides adequate motorized access including camping and game retrieval.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The draft environmental impact statement (DEIS) analyzed the effects of implementing five action alternatives for designating NFS roads, NFS trails and areas on NFS lands for motor vehicle use. Chapter 3 of the DEIS summarized the physical, biological, social, and economic environments of the project area and the effects of implementing each alternative on that environment.

Letter Number	Summary Statement	Alternative D - Response to Comments
02152011-01-1/2	Supports alternative D as it provides best opportunity for quality outdoor recreation.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
03072011-18-24	Supports alternative D in that it protects resources better than alternatives F and G, but does not restrict motorized access like alternative E.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The draft environmental impact statement (DEIS) analyzed the effects of implementing five action alternatives for designating NFS roads, NFS trails and areas on NFS lands for motor vehicle use. Chapter 3 of the DEIS summarized the physical, biological, social, and economic environments of the project area and the effects of implementing each alternative on that environment.

Alternative E

Letter Number	Summary Statement	Alternative E - Response to Comment
02212011-01-1 03072011-56-4a 03042011-47-2	Does not support alternative E. Does not support due to lack of dispersed camping and motorized game retrieval.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
01102011-08-1 01132011-13-1 01142011-03-1 01152011-06-1 01152011-45-1 01152011-51-1 01192011-01-4 01192011-05-1 01262011-03-2 01292011-02-1 01292011-03-1	Desire to implement or select alternative E. Feel the over 2,300 miles of roads in the forest for motorized activities and access is adequate.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.

Letter Number	Summary Statement	Alternative E - Response to Comment
02042011-02-2		
03012011-01-1		
03012011-07-1		
03012011-07-1		
03022011-11-1		
03022011-17-3		
03022011-24-1		
03032011-09-1		
03032011-13-1		
03032011-14-5		
03042011-32-1		
03042011-35-1		
03042011-44-2		
03052011-01-2		
03062011-10-2		
03072011-10-1/4		
03062011-21-2		
03062011-23-1		
03062011-28-2		
03072011-51-2		
03072011-53-5		
03072011-54-1		
03072011-57-1		
03072011-74-1		
03072011-101-1		
03072011-103-1		
03072011-113-1		
03072011-114-4		
03072011-140-4		
03072011-144-2		
03072011-157-2		
03072011-158-2		
03072011-165-1		
03072011-169-3		
03072011-170-1		
03072011-178-1		
03072011-180-1		

Letter Number	Summary Statement	Alternative E - Response to Comment
03072011-182-1 03072011-193-1 03072011-208-1 03072011-213-1 03072011-224-1 03072011-235-1		
01072011-03-1 01072011-16-1/3 01072011-28-9 01072011-30-9 01102011-03-1 01112011-04-3 01152011-03-2 01152011-14-2/3 01152011-22-1 01152011-37-2 01152011-44-1 01152011-47-1/4 01152011-50-2/3 01152011-56-1 01152011-60-1 01182011-01-1 01182011-06-1 01192011-03-2 01192011-06-1 01242011-03-1 01282011-01-1 01292011-05-2 01292011-07-1 01292011-09-1 01292011-11-1 01292011-12-2 01292011-17- 01292011-19-1 02022011-02-2/4 02032011-03-1	Preference for alternative E for the protection of wildlife, including threatened, endangered, and sensitive species, and other natural resources and reduction of motorized activities and access on the landscape.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The draft environmental impact statement (DEIS) analyzed the effects of implementing five action alternatives for designating NFS roads, NFS trails and areas on NFS lands for motor vehicle use. Chapter 3 of the DEIS summarized the physical, biological, social, and economic environments of the project area and the effects of implementing each alternative on that environment. Of the five action alternatives analyzed, alternative E provides the least motor vehicle travel on designated routes. All action alternatives limit cross-country motor vehicle travel in accordance with the Travel Management Rule. Alternative E does not designate any corridors for motorized access for dispersed camping or big game retrieval.

Letter Number	Summary Statement	Alternative E - Response to Comment
02072011-06-19 02102011-03-1 02102011-04-2 02172011-01-1 02282011-12-1 03022011-18-1 03022011-30-1/2 03022011-31-1 03022011-033-1 03042011-30-4 03042011-52-1 03052011-22-1 03052011-23-7 03062011-15-3 03062011-24-5 03062011-33-1 03062011-34-9 03062011-37-2 03062011-39-4/5 03062011-43-1 03072011-21-3a 03072011-37-3 03072011-59-1 03072011-80-1/3 03072011-98-2 03072011-111-1/2 03072011-119-1 03072011-123-1 03072011-139-1 03072011-156-1 03072011-185-3 03072011-187-1 03072011-204-1 03072011-223-2 03072011-225-2		
01112011-03-1	Supports alternative E, as it	The action alternatives present a range of options that balance the need for access and resource

Letter Number	Summary Statement	Alternative E - Response to Comment
02022011-02-4 03022011-18-1 03032011-11-1 03062011-06-2 03062011-39-6 03072011-62-1/2	reduces the most roads and protects riparian and stream habitat.	protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by limiting motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads have existed for decades that impact the riparian areas, streams, and wetlands. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and chapter 3 of the DEIS describe effects to these areas.
01122011-02-1 01122011-03-1 01122011-04-1 01152011-46-1/2 03072011-114-4	Preference for alternative E as it reduces road miles by 50 percent and no motorized big game retrieval (MBGR). Concern that motorized big game retrieval would result in more routes being developed.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. Alternative E does not propose to designate any corridors for motorized big game retrieval (MBGR). Corridors for MBGR are “solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51(b)). Proposed MBGR corridors would not be open to other motorized uses except where they overlap motorized dispersed camping corridors. Pages 16 and 17 of the DEIS describes some of the applicable laws or regulations to protect forest resources.
01072011-01-1/2 01072011-07-1 01072011-17-1 01072011-23-1 01072011-25 to 96-1/2 01082011-07 to 64-1/2 01092011-05 to 23-1/2 01102011-09 to 23-1/2 01122011-05-1 01122011-06 to 19-1/2 01132011-08-1/2 01132011-15 to 23-1/2 01142011-04 to 09-1/2 01152011-14-1/3 01152011-16-1/5 01152011-24-1/2 01152011-32-1/2 01152011-33-1/2	Preference for alternative E which provides protection for the San Francisco River and the Wilderness Study Area and associated species and habitat.	There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. Access associated with the San Francisco River varied by alternative. Alternative E proposes the most protection and the greatest reduction of motorized vehicle access down the San Francisco River and associated Wilderness Study Area. Alternatives D and G maintain access to the San Francisco but proposed to close motorized road access down the San Francisco River.

Letter Number	Summary Statement	Alternative E - Response to Comment
01152011-38-1/2		
01152011-43-3		
01162011-01 to 05-1/2		
01172011-02-1		
01172011-03-1/2		
01172011-04-1/2		
01182011-10-1/2		
01182011-11-1/2		
01202011-04-1/2		
01202011-05-1/2		
01232011-01-1/2/3		
01252011-03-1/2		
01282011-03-1/2		
01292011-04-1		
01292011-18-2		
01312011-02-1/2		
01312011-03-1/2		
02022011-03-1/2		
02032011-05-1/2		
02032011-06-1/2		
02112011-02-1		
02112011-003-1/2		
02112011-004-1/2		
02142011-(002 to 016)-1/2		
02152011-(003 to 006)-1/2		
02162011-(007 to 013)-1/2		
02172011-(002 to 004)-1/2		
02182011-003 to 015-1		
02192011-001 to 008-1		
02202011-001-1		
02202011-002-1		
02202011-003-1/2		
02212011-003-1		
02252011-007-1		
02282011-02-5/6/7/8/9		
03012011-15-1		
03012011-16-1		

Letter Number	Summary Statement	Alternative E - Response to Comment
03022011-19 to 22-1		
03022011-25-1		
03022011-27-1		
03022011-29-1		
03022011-034-1		
03032011-03-1/2		
03032011-19-1		
03032011-20-1		
03042011-12-1/2		
03042011-14-1		
03042011-15-1		
03042011-18-1		
03042011-24-1		
03042011-34-1b		
03042011-38-1		
03042011-41-2		
03062011-39-7		
03072011-01-3		
03072011-02-2		
03072011-03-1/2		
03072011-04-1		
03072011-06-1		
03072011-08-2		
03072011-13-1		
03072011-21-3		
03072011-77-2		
03072011-80-1/2		
03072011-91-1		
03072011-153-2a		
03072011-154-1		
03072011-160-1		
03072011-162-1		
03072011-166-1		
03072011-167-1		
03072011-168-3		
03072011-17-1		
03072011-139-2		

Letter Number	Summary Statement	Alternative E - Response to Comment
03072011-172-1 03072011-177-1 03072011-181-1 03072011-183-1 03072011-186-1a 03072011-188-2 03072011-192-1/2 03072011-196-1 03072011-201-1/2 03072011-204-1 03072011-235-2 03072011-(0256 to 0275)-1 03072011-(0374 to 0412)-1		
02072011-06-26 02102011-05-1	Supports alternative E, but still too many miles that impact resources. Need more staff and rigorous monitoring plan to manage.	Thank you for your comment. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The Forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
01152011-26-1 03022011-31-2 03072011-93-1/2	Would like the selection of alternatives E or G for the protection of resources.	Thank you for your comment. There are differing opinions regarding which alternative the Forest Supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
03062011-03-2 03072011-47-3 03072011-57-6 03072011-92-1/3 03072011-114-5 03072011-116-4 03072011-148-1	Preference for Alternative E, but will accept Alternative G. Alternative G is a good compromise. Support protection of resources and reduction of motorized vehicle use.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. Alternative E proposes the least amount of motor vehicle travel on designated routes allowing more area for non-motorized experiences. Alternative G and all other action alternatives limit cross-country motor vehicle travel in accordance with the Travel Management Rule. The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams, and wetlands by limiting motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial

Letter Number	Summary Statement	Alternative E - Response to Comment
		forest roads have existed for decades that impact the riparian areas, streams and wetlands. It would be impossible to eliminate traffic on all of these routes.

Alternative F

Letter Number	Summary Statement	Alternative F - Response to Comments
02032011-04-3 02132011-02-1 03052011-33-1 03072011-21-91 03072011-43-1	Supports proposed action road closures for protection of forest. Alternative proposes less acreages of area open to all vehicles for the purpose of cross-country travel.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. Tables 11 and 12 display the estimated acreage of motorized dispersed camping and motorized big game retrieval corridors and areas. Alternative F reduces amount of acres compared to alternative B.
03022011-02-2	Cannot support alternative F that closes large portion of existing NFS roads.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.

Alternative G

Letter Number	Summary Statement	Alternative G - Response to Comment
01072011-16-2 01152011-27-1 01152011-28-1 01152011-42-1 01242011-01-2 01242011-02-3 01292011-08-1 01292011-13-1 01302011-02-1 02022011-01-1 02282011-02-1 03022011-06-1 03032011-15-1 03042011-37-1 03042011-45-1 03042011-46-3 03042011-54-2 03042011-58-1 03052011-04-1 03052011-29-1 03062011-08-1 03062011-09-1 03062011-14-1 03062011-17-1 03062011-18-1 03072011-05-1 03072011-22-1 03072011-27-1 03072011-32-2 03072011-57-4 03072011-73-1/2	Preference, support, or favor Alternative G motorized road and trail system, and MDC and MBGR corridors. Road density is reduced and still provides motorized opportunities.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.

Letter Number	Summary Statement	Alternative G - Response to Comment
03072011-87-1 03072011-95-3 03072011-99-2/4 03072011-118-1 03072011-163-1 03072011-176-1 03072011-184-1 03072011-185-2 03072011-195-2 03072011-215-1		
03042011-08-1 03072011-50-1	Opposes alternative G which eliminates too much motorized recreational opportunities and traditional uses.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
03072011-136-1	Supports alternative G as a reasonable compromise. But would like even less roads to improve quality hunts.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
03072011-32-3 03072011-87-1	Supports the selection of alternative G without motorized big game retrieval.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input.
01152011-55-2	Support selection of G with 1 mile motorized big game retrieval corridor.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and

Letter Number	Summary Statement	Alternative G - Response to Comment
		public input.
01152011-05-2 01152011-17-1 01292011-08-2 01292011-05-1 01292011-16-1 03042011-39-1 03072011-45-1 03072011-58-2 03072011-94-1 03072011-97-1 03072011-131-1 03072011-143-1 03072011-226-1	Support selection of alternative G. The best to maintain Forest resources and continue to provide access for public.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The draft environmental impact statement (DEIS) analyzed the effects of implementing five action alternatives for designating NFS roads, NFS trails and areas on NFS lands for motor vehicle use. Chapter 3 of the DEIS summarized the physical, biological, social, and economic environments of the project area and the effects of implementing each alternative on that environment.
01152011-48-1 01152011-59-1/2a 01172011-01-1 03032011-04-2a 03052011-24-1 03062011-48-8 03072011-153-1/2a 03072011-186-1b	Preference for alternative G which provides protection for the San Francisco River	Alternative G maintains motorized access to the San Francisco but proposes to close motorized road access down the San Francisco River to Mule Creek.
03032011-15-2 03062011-04-11	Supports the designation of motorized dispersed camping corridors proposed in alternative G. Some loss of opportunity, but proposed corridors are similar to those currently used.	Thank you for your comment. In addition to the proposed designation of 1,327 miles of corridors for motorized access for dispersed camping, alternative G, the preferred alternative provides another 1,996 miles where people can park their vehicle one vehicle length, including any towed trailer, off the side of the road. Where there are no designated motorized dispersed camping corridors, it does not eliminate the ability to disperse camp along and away from roads. Page 16 of the DEIS describes parking and dispersed camping: *Dispersed camping, such as tent camping, may occur anywhere on the forest. Riding horses and hiking to access a campsite is allowed anywhere on the forest. Parking for this type of dispersed camping may occur along any designated open road. Parking would be limited to one vehicle length, including any towed trailer, from the side of the road. Parking should occur*

Letter Number	Summary Statement	Alternative G - Response to Comment
		where it is safe to park, does not cause resource damage (e.g., ruts), or is not already restricted. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
03062011-48-3a	Supports selection of alternative G without motorized dispersed camping corridors.	Thank you for your comment. There are differing opinions regarding which alternative the forest supervisor should select. The forest supervisor will select an alternative based on the analysis presented within the final EIS and public input. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
02022011-02-04a 02072011-06-2/5/9 02102011-04-3	Alternative G will continue to have impacts on wildlife and stream and aquatic systems. With the lack of budget for maintenance, roads will not be maintained and fall apart.	Thank you for your comment. The watershed and aquatic species and habitat sections in chapter 3 of the DEIS describe the effects of the alternatives including alternative G, to water and aquatic resources. All alternatives reduce the places where people could drive in or near riparian areas, rivers, streams, and wetlands by limiting motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads have existed for decades that impact the riparian areas, streams and wetlands. It would be impossible to eliminate traffic on all of these routes.
01242011-03-3 02042011-02-2a 02072011-06-1/2/4/13 02102011-04-3 02142011-01-1 thru 6 03042011-13-2 03072011-98-5	Does not support preferred alternative G. Feels alternative favors motorized uses and does not protect resources with addition of new routes, open road miles, and impacts to streams. Feels there will be increases in impacts to human uses and wildlife habitat.	All action alternatives do not allow unlimited cross-country travel. Alternatives do vary on the amount of limited off-road (cross-country) travel allowed in corridors for motorized dispersed camping and motorized big game retrieval. See table 2 in the DEIS for comparison on the amount of miles and acreage available for motorized uses. See chapter 3 of the DEIS for a description of effects of alternative G and other action alternatives.

Aquatic Species and Habitat

Letter/ Comment #	Summary Statement	Aquatic Species and Habitat - Response to Comments
01072011-01-5 01072011-08-4 01072011-21-4 01072011-25 to 96-5 01082011-04-4 01082011-07 to 64-5 01092011-05 to 23-5 01102011-09 to 23-5 01112011-02-4 01122011-01-4 01122011-06 to 19-5 01132011-08-5 01132011-15 to 23-5 01142011-04 to 09-5 01162011-01 to 05-5 01172011-02-5 01172011-03-5 01172011-04-5 01182011-10-5 01182011-11-5 01202011-04-5 01202011-05-5 01252011-03-5 01262011-05-3 01282011-03-5 01292011-04-3 01312011-02-5 01312011-03-5 02022011-03-5 02032011-05-5 02032011-06-5 02112011-003-5	Prioritize roads and dispersed camping areas for closure that impact or affect listed threatened, endangered, or sensitive aquatic species and native fish and their habitat.	Motorized routes that may impact listed species were identified through the development of the Travel Analysis Plan (TAP), Public Comments, internal issues, coarse filter, stream crossing identification, Connected Disturbed Area data. Alternatives were then developed utilizing this information and analyzed in the DEIS. Listed species were one of many factors utilized to identify actions for route status in the alternatives. Not all roads that affect listed species could be closed due to various considerations (i.e., access to private property, administrative needs). The decision maker will consider all input and choose the mix of routes that best meets the purpose and need for the project while balancing public access needs and resource protection.

Letter/ Comment #	Summary Statement	Aquatic Species and Habitat - Response to Comments
02112011-004-5 02142011-(002 to 016)-5 02152011-(003 to 006)-5 02162011-(007 to 013)-5 02172011-(002 to 004)-5 0220201-003-5 03062011-24-1 03062011-34-8 03072011-138-1		
01192011-02-14	Piscicide use and continued stocking of nonnative fish, not motorized travel, are cause of decline of native fish.	The decision to introduce nonnative species of fish is not a Forest Service decision. The Gila National Forest has worked cooperatively with the New Mexico Department of Game and Fish (NMDGF) to curtail that agencies practice of stocking nonnative fish, including nonnative trout and other nonnative game fish, in streams on the Gila National Forest. Piscicide use is analyzed through the NEPA process and Section 7 Endangered Species Act (ESA) consultation is completed. No piscicide project undertaken on the Gila National Forest has been determined to have adverse effects to listed native fish species. In fact, piscicide use has been beneficial to native species by reducing nonnative fish populations and allowing for recovery of the Gila trout.
01192011-02-14a	Commenter feels the term “May Affect” has no basis and does not include effects of motorized uses.	“May affect” is a term related to Endangered Species Act Section 7 consultation and is a determination of affect that the proposed action will have on threatened and endangered species and designated critical habitat. The DEIS analyzes the effects of motorized routes and trails.
01192011-02-15a	Does critical habitat for the Gila chub occur in New Mexico?	Designated critical habitat for the Gila chub occurs in New Mexico on the Gila National Forest. Two stream reaches—a portion of Turkey Creek and Harden Cienega—are designated as critical habitat. Turkey Creek is designated critical habitat from the wilderness boundary upstream to Corral Canyon. The designated critical habitat along Turkey Creek is located within the Gila Wilderness. A GIS mapping error during the initial analysis in the DEIS indicated that Gila Chub habitat in Turkey Creek extended downstream to the confluence with the Gila River. This error has been corrected in the FEIS analysis.

Letter/ Comment #	Summary Statement	Aquatic Species and Habitat - Response to Comments
01192011-02-16	Motorized Travel is not affecting Chihuahua Chub	In 2008, a population of Chihuahua chub was discovered in the Mimbres River on the Gila National Forest. A motorized route that traverses the Mimbres River where this population is located is: (1) located within 300 feet of the stream for 2 miles; and (2) has 22 low water crossings associated with it. Because of the varied status of this route in the action alternatives it was included in the analysis.
01192011-02-17	Gila trout populations are in roadless areas and will not be affected by Decision.	A portion of Black Canyon, occupied by Gila trout, is neither located within wilderness nor a roadless area. There are 1.30 miles of routes that are within 300 feet of this stream and three route crossings (two low water, one bridge) within occupied habitat. Because of the varied status of this route in the action alternatives it was included in the analysis.
01192011-02-18	No impacts to Rio Grande Cutthroat trout because none exist on the Forest.	Comment noted
01192011-02-19	Are sensitive species trends the conclusion of one person?	Regional Foresters identify sensitive species occurring within the Region. They use the following sources as possible candidates for listing as sensitive species: Fish and Wildlife Service or National Marine Fisheries Service candidates for Federal listing (categories 1 and 2) under Federal Register Notice of Review; State lists of endangered, threatened, rare, endemic, unique, or vanishing species, especially those listed as threatened under State law; and other sources as appropriate to focus conservation management strategies and to avert the need for Federal or State listing as a result of forest management activities.
03072011-21-27a	Livestock grazing like routes and route use increases sediment delivery to stream. Roads and livestock grazing cumulatively affect sediment-related water quality, stream conditions, and aquatic habitat.	Livestock grazing can increase sediment delivery to streams which can cumulatively impact water quality, streams, and aquatic habitat. Additional information on the current status of livestock grazing management and its impacts to aquatic species on the Gila National Forest has been included in the aquatic specialist report (page 58) and DEIS.
03042011-30-5 03072011-53-6	Riparian areas and wetlands are small percentage of landscape and support greater diversity than surrounding	The DEIS analyzed the effects of routes and trails that are within 300 feet of and cross perennial and intermittent streams (DEIS pages 105–107). The analysis discusses effects that routes and trails have on aquatic resources including sedimentation and erosion (DEIS pages 102–126).

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	areas. ORVs disturb wildlife, cause bank erosion and increase stream sedimentation.	
03072011-138-1	No factual evidence that stream crossings cause harm to aquatic species. Speculation is not rationale for proposing route closures where there are stream crossings.	The best available science supports our position that where roads cross streams there are impacts to not only the stream but to aquatic species occupying the stream. See aquatic specialist Report pages 6–8 and DEIS pages 103–105.
03072011-138-2	Agency has protected Rio Grande Cutthroat Trout.	Comment noted: However, the Rio Grande cutthroat trout is not listed under the ESA, the species is on the Region 3 Regional Foresters Sensitive Species List and was analyzed in the DEIS as a sensitive species.
03072011-18-10	There are sensitive species in the State that are not listed in DEIS.	Only those sensitive species identified on the Southwest Regional Foresters list are required to be analyzed. Regional Foresters identify sensitive species occurring within the region. They use the following sources as possible candidates for listing as sensitive species: Fish and Wildlife Service or National Marine Fisheries Service candidates for Federal listing (categories 1 and 2) under Federal Register Notice of Review; State lists of endangered, threatened, rare, endemic, unique, or vanishing species, especially those listed as threatened under State law; and other sources as appropriate to focus conservation management strategies and to avert the need for Federal or State listing as a result of forest management activities. Analysis of effects to Region 3 aquatic sensitive species is displayed in the DEIS (pages 119–125) and in the aquatic specialist Report (pages 32–57).
03072011-18-10a	Description of commenter's method of determining impacts to sensitive species	Comment noted: For this analysis, measures or indicators were chosen to allow for comparison between the current condition of the aquatic resources and the relative risk to these resources from each alternative. Relative risks of the travel management alternatives were determined by analyzing three indicators: total road and motorized trail miles or road density and route use, total road miles within 300 feet of perennial or intermittent streams, and number of motorized route crossings on perennial and intermittent stream.
03072011-18-10b	Gila Topminnow was not considered in the DEIS.	Gila topminnow does not occur on the Gila National Forest. The species was extirpated on the forest during the 1950s. The closest possibly occupied site is located on New Mexico Department of Game

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		and Fish Property at Redrock, New Mexico. The site is a small off-channel pond that the Department recently constructed.
03072011-18-8	The analysis did not indicate which alternative posed the least impact to listed fish species.	For each listed fish species, a comparison of the relative risk of each alternative was completed and displayed (DEIS pages 105–119).
03072011-18-8a	No relative impact assessment was performed for sensitive species.	The conclusions of the aquatic specialist appear on pages 119–125 of the DEIS. This conclusion identifies the relative risk of all alternatives as they relate to species identified in the aquatics section of the analysis, including Region 3 sensitive species that occur in the action area.
03072011-21-109	Routes contribute sediment to streams which is one of the primary causes of reduced frequency, volume, and quality of pool habitat that is essential to native fish, including federally listed loach minnow, spikedace, Gila chub, Chihuahua cub, and Gila trout.	Comment noted.
03072011-21-11	Statement of what is in NM Senate Joint Memorial Report (SJM 40), 2008 and NM Environment Department 2008:51-52. NM Department of Game and Fish Stated that roads have been recognized as primary human-caused source of soil and water disturbances in forested environments. Motorized	Thank you for your comment. We acknowledge that off-road vehicle use can have negative impacts on aquatic habitats and watersheds. The DEIS includes discussion regarding the impacts of the alternatives on aquatic habitat (pages 100–125) and watershed and soils (pages 77–99).

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	routes crossing through aquatic habitat degrade water quality, increase sediment deposition and reduce habitat quality for aquatic species.	
03072011-21-12	The Forest Service must consider the impacts of this proposed route on listed species, native fish, spread of invasive species, potential for erosion, soil and water disturbance and contamination, degradation of water quality, and habitat for aquatic species.	The aquatic specialist report, wildlife specialist report, watershed and soil specialist report, invasive species report, and DEIS considered the impacts of the route along the San Francisco River.
03072011-21-17	Statement of what is in USFWS Federal Register Proposed Rule to designate critical habitat for loach minnow and spikedace.	Comment noted.
03072011-21-18	Section 7 Consultation must take place prior to designation of any route or portion of any route in the San Francisco River and the Proposed Action must not jeopardize the continued existence of the species.	Section 7 Consultation on all listed, proposed, designated and proposed critical habitat within the action area has been initiated with the U.S. Fish and Wildlife Service and will be completed prior to a decision on travel management.
03072011-21-19	Statement from Federal Register Proposed Rule to Designate Critical Habitat	Comment noted: Critical habitat rule for loach minnow and spikedace was finalized in 2012 and considered in the DEIS and biological assessment for the Travel Management Rule. The USFWS will determine if the proposed action is likely to jeopardize the species or adversely modify critical habitat.

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	for loach minnow and spikedace and actions that could adversely modify critical habitat.	
03072011-21-19a	Apache-Sitgreaves Fisheries Specialist Report for A-S TMP DEIS states road along San Francisco River in AZ has negative impacts to fish and riparian habitat, and within NM there are stream crossings that are open to motorized travel and the route is often within the stream channel.	The route along the San Francisco River in New Mexico, located between Pleasanton and the New Mexico/Arizona state line was analyzed in the DEIS. The route does include stream crossings and travels within 300 feet of the stream along much of its length. The stream crossings and miles of this route that are within 300 feet of the San Francisco River were included in the analysis (DEIS pages 105–106). The status of this route varies by alternative and was proposed to be nonmotorized in the preferred alternative.
03072011-21-24	Assumption that all vehicle types result in same amount of disturbance is incorrect.	This assumption was removed from the aquatic specialist report.
03072011-21-24a	Failure to analyze site specific impacts. Impacts based on assumptions about motorized uses rather than on the ground information.	Motorized routes that may impact aquatic resources were identified through the development of the Travel Analysis Process (TAP), Public Comments, internal issues, coarse filter, stream crossing identification, Connected Disturbed Area data. Analysis was based upon best scientific information available pertaining to the impacts of roads on aquatic systems and species. Stream crossings on the San Francisco River route were inventoried and photographed prior to this analysis. There is a wealth of information detailing the direct and indirect effects of roads on physical and ecological condition of forested ecosystems.
03072011-21-26	Did not disclose that road runoff, during the summer, delivered at stream crossings and other points that are hydrologically connected to streams elevate stream	The aquatic and watershed specialists reports and the DEIS disclose that water temperature is one parameter of water quality that is impacted by roads (see aquatic report page 7, DEIS page 82, and watershed report). However, the mechanisms driving these impacts were not discussed in detail. Additional information is provided in the FEIS discussing road impacts to stream temperature. The referenced document cited in this comment, National Research Council 2008, is a document that addresses the management of runoff from urbanized areas and the effects of that runoff and is irrelevant to forest roads. The literature reviewed and used in the aquatic specialist's report included

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	temperatures.	literature discussing the impacts of sedimentation, runoff, and water temperature to native fish including trout.
03072011-21-27	Cumulative Affects: The DEIS does not adequately describe that livestock grazing has negative impacts to watersheds and aquatic resources that can combine with those from motorized routes.	The cumulative effects on watershed and aquatic resources are discussed in the watershed specialist report, aquatic specialist report (pages 58–59), and DEIS (pages 96–100, 125–126, 207–212).
03072011-21-9	Forest should permanently close Frisco-Blue Area and prepare systematic assessment of these important riparian areas to gauge baseline water quality, presence and diversity of fish and wildlife, and assess ecological, biological, and quiet use recreational values.	Motorized routes that may impact listed species were identified through the development of the Travel Analysis Process (TAP), Public Comments, internal issues, coarse filter, stream crossing identification, Connected Disturbed Area data. Alternatives were then developed utilizing this information and analyzed in the DEIS. The decision maker will consider all input and choose the mix of routes that best meets the purpose and need for the project while balancing public access needs and resource protection. A range of alternatives was developed for the project that include non-motorizing, designating as administrative use, or designating routes for access to private property only, in the Frisco-Blue area.
03072011-21-9a	Protecting SF River from negative impacts of motorized uses will ensure Forest Service is compliant with NFMA, ESA, and CWA.	A range of alternatives was developed for the project and non-motorizing the route in the San Francisco River to Mule Creek is considered. The preferred alternative includes non-motorizing this route.
03072011-21-9b	The San Francisco River and Mule Creek area is important habitat for many species.	Comment noted

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03072011-21-9c	Ongoing motorized use in these areas (San Francisco River/Big Dry Creek/Little Dry Creek) is incompatible with federal law and is highly suspect given current conditions and the legally-protected ecological, biological, and recreational values.	Motorized routes that may impact listed species were identified through the development of the Travel Analysis Process (TAP), Public Comments, internal issues, coarse filter, stream crossing identification, Connected Disturbed Area data. Alternatives were then developed using this information and analyzed in the DEIS. The decision maker will consider all input and choose the mix of routes that best meets the purpose and need for the project while balancing public access needs and resource protection. A range of alternatives was developed for the project that include non-motorizing, designating as administrative use, or designating routes for access to private property only, in the Frisco-Blue area.
03072011-21-9d	Ongoing motorized use of the San Francisco River to Mule Creek will cause adverse impacts.	The impacts that motorized routes have on ecological, biological, and recreational values on the forest were analyzed. The preferred alternative includes non-motorizing the route in the San Francisco River/Mule Creek area.
03072011-53-6a	Support for BMPs that locate ORV routes 300 feet from waterbodies and wetlands.	This analysis is for routes that currently exist on the forest, not construction of new routes. Any future road and trail construction would undergo a separate site-specific environmental analysis and construction would adhere to Forest Plan standards and guidelines as well as any best management practices associated with law, regulation, and policy.
03072011-53-6b	Concern about proposal to include motorized route in San Francisco River and Big Dry. T and E species and water quality could be negatively impacted. Climate change will impose additions stresses for streams and species they support.	Motorized routes that may impact listed species were identified through the development of the Travel Analysis Process (TAP), Public Comments, internal issues, coarse filter, stream crossing identification, Connected Disturbed Area data. Alternatives were then developed using this information and analyzed in the DEIS. The decision maker will consider all input and choose the mix of routes that best meets the purpose and need for the project while balancing public access needs and resource protection. A range of alternatives was developed for the project and non-motorizing the route in the San Francisco River to Mule Creek is considered. Climate change effects were discussed in the analysis.
03072011-69-17a	DEIS needs to be revised to assess and disclose condition of habitat attributes that are affected	The analysis was conducted at the landscape level and did not focus on site specific conditions due to lack of site specific information. The relative risk analysis provides the decision maker with a broad over view of potential impacts across 3.3 million acres of National Forest System (NFS) lands. Some site-specific information (i.e., location of stream crossings in critical habitat or occupied habitat). The

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	by alternatives in all watersheds with MIS, Sensitive and/or ESA-listed fish.	site-specific considerations were used to develop six alternatives. The six alternatives present the decision maker with a range of options that balance access and resource goals. The analysis is a Relative Risk assessment considering the differences in risks associated with alternatives and provides the decision maker with sufficient information to make a decision.
03072011-69-17b	The DEIS baselessly asserts that the overall forest trend for aquatic habitat and species is positive.	The aquatic specialist report states the following based upon personal observations of the forest aquatic, watershed, and soils specialists. "Although localized degraded habitats continue to be present, the overall Forest trend for aquatic and riparian habitat is stable or improving (pers. obs. J. Monzingo, C. Koury, M. Natharius 2012) (draft aquatic specialist report page 58).
03072011-69-8	The DEIS analysis in inadequate because it does not disclose the total amount (miles and density) of all existing and motorized routes under the alternatives that are within 300 feet of streams upstream of impaired streams and aquatic habitat for MIS, Sensitive or listed species.	The density of routes and the miles of routes within 300 feet of streams including those upstream and downstream of impaired streams and aquatic habitat were analyzed for each of the alternatives.
03072011-69-8a	The DEIS does not disclose the number of stream crossings by all existing routes and the miles of all existing routes that are connected to streams at the scale of watersheds with habitats for aquatic MIS, Sensitive, or listed species.	All crossings on perennial and intermittent streams, including those upstream and downstream of habitat for aquatic species, were analyzed for each of the alternatives. Alternative B displays the number of stream crossings for all existing routes and the number of stream crossings for each alternative is displayed. Route proximity to streams is used as a surrogate for connectivity (watershed specialist report page 83) The reports and FEIS will be updated, using the 6th-code Watershed Condition Classification information for the cumulative effects analysis. This new information incorporates soils, roads, aquatic conditions, and other indicators found within the watershed to form a current condition rating. This current condition rating considers a culmination of past activities and impacts to the watershed. Also see response to 03072011-69-7 under Watershed/Soils.

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03072011-69-8b	The DEIS ignores stream crossings on ephemeral streams.	Comment noted. The effects of motorized route systems on ephemeral drainages will be considered in the FEIS.
03072011-69-8c	Routes and landings near streams also affect stream shading, runoff water temperature, groundwater inflows, and, thus, increase water temperature, although this is not adequately disclosed in the DEIS.	The aquatic and watershed specialists reports and the DEIS disclose that water temperature is one parameter of water quality that is impacted by roads (see aquatic report page 7, DEIS page 82). However, the mechanisms driving these impacts were not discussed in detail. Additional information will be provided in the FEIS discussing road impacts to stream temperature.

County Involvement

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03022011-32-3/20 03032011-16-5 03042011-48-4/6 03072011-67-1 03072011-96-4	There was a lack of coordination between the Forest and county commissions. No consideration of County plans and programs.	Catron, Grant, Hidalgo, and Sierra Counties were offered (2/11/2009) and accepted Cooperating Agency status. Memoranda of understanding were signed March 3, 2009, in which the counties agreed to: • Provide the Forest Service with relevant information related to the County Comprehensive Plan with respect to natural-resource-based industries, the economy, culture, and traditional uses. • Provide the Forest Service with information and effects to the County transportation system planning for any lands within borders of the County. A list of the main County involvement interactions (134 line items) which took place between 2005 to February of 2013, is located in a document dated February 21, 2013. The document summarizes correspondence content, information, and meetings with the counties. Topics included items such as cooperating agency, RS-2477, social and economics, and travel management planning meetings.

Cultural Resources

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01192011-02-32	Comment quotes places in DEIS and R3 Heritage TM Protocol where Forest points out that motorized travel can affect cultural resources (destruction and/ or looting). Commenter is in support of Antiquities Act, but refers to Agency's past destruction of cultural resources by road construction and burning and dismantling historic sites.	Effects of motorized travel on cultural resources are addressed in the TM DEIS (DEIS: 229–244), cultural resource specialist report, and Section 106 compliance reports. The Gila National Forest complies with applicable cultural resource laws, primarily the National Historic Preservation Act of 1966 (NHPA), as amended (including Programmatic Agreements developed under 36 CFR 800 regulations), for ground-disturbing projects meeting the definition of a "federal undertaking" on forest-administered lands. In the past, there have been isolated incidents of non-compliance or accidental destruction nationwide in a variety of Federal agencies, some involving purposeful damage to cultural resources. These are outside the scope of this project and analysis. Forest Service projects (including road construction) occurring prior to passage of NHPA (and prior to its 1976 amendments, in particular), were not held to the compliance standards of today, which have evolved over the last 35+ years (DEIS: 245). Incidents of non-compliance and accidental or unauthorized resource destruction by Federal agencies are highly uncommon.
02072011-02-4 03072011-21-108a	Off-Road Vehicles (ORVs) have caused damage to archeological sites on the Gila National Forest. This is documented in heavily redacted heritage reports and site records provided to The Wilderness Society for a 2009 FOIA request, which was reviewed by the CBD. It is suggested that incident reports from at least 2001 to the present be reviewed to determine the number and location of sites impacted by ORVs or dispersed camping in the Gila National Forest.	The Gila National Forest acknowledges that some cultural resource sites have been affected by off-road vehicle use under the existing Forest Plan which allows cross-country motorized use forestwide, except in wilderness and resource natural areas. The instances cited by the commenter are examples of these kinds of effects. Prohibiting forest-wide cross-country use under the Travel Management Rule by designating routes, trails, corridors and areas will greatly decrease the level of access and potential for damage by ORVs to cultural sites. The action alternatives in the DEIS present a range of options concerning access to NFS lands and resource protection. Where appropriate in the development of these alternatives, known conflicts with cultural resources were considered. These conflicts included direct and indirect effects of motorized access like, but not limited to, vehicular contact with features, artifacts, cultural deposits; looting/vandalism; dismantling or scavenging of cultural sites, etc. In some cases and dependent upon the action alternative, the presence of these known conflicts resulted in excluding travel management designations like areas, motorized big game retrieval (MBGR), or motorized dispersed camping (MDC) in certain areas or along certain routes. For the same reason, some routes were proposed closed or proposed to remain closed in some of the action alternatives. Further, under the TM Protocol, there are several actions that require Section 106 consultation and compliance. These include the designation of motorized dispersed camping, areas, and route designations such as unauthorized routes, routes being re-opened, and routes changing status from nonmotorized to motorized. Information gathered through TM Section 106 archaeological survey has

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		provided more site specific information. With this information and as appropriate, the Gila National Forest, in consultation with the State Historical Preservation Officer (SHPO) and other consulting parties, will be able to minimize potential adverse effects through avoidance or mitigation measures including but not limited to fencing, monitoring, signing, no tracing fire rings and trash, or re-routing routes. This information has allowed the forest to modify specific designations within the action alternatives.
03012011-13-1	The Navajo Nation Historic Preservation Department - Traditional Culture Program (NNHPD-TCP) received the DEIS and has determined the undertaking will NOT impact the Navajo traditional cultural resources. The Traditional Culture Program, on behalf of the Navajo Nation has no concerns at this time. However, if an inadvertent discovery is made during this project, the NNHPD-TCP request that they be notified respectively in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA).	The Gila National Forest thanks the Navajo Nation Historic Preservation Department - Traditional Culture Program for the response that they have no concerns at this time. In accordance with NAGPRA, the forest will notify them if any inadvertent discoveries are made that are potentially Navajo in origin.
03042011-19-5	The EPA developed the language at left, and recommends that it be included in the FEIS. The comment says that this language is intended to strengthen the document. It is essentially a summary of the “Cultural and Traditional Practices – Tribes” section in the DEIS.	The Gila National Forest thanks the EPA for their comments on the “Cultural and Traditional Practices-Tribes” section of the DEIS. For the FEIS, the forest has more fully analyzed this section. For this reason, the language suggested by the EPA is no longer pertinent.

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03072011-21-108b	Recent literature concludes that most vandalism occurs at sites near roads or within 200 meters of roadways.	The study by Spangler et al. (2006) examines 339 cultural sites in Range Creek Canyon, Utah, where some of the land has had controlled access for decades, and other portions are open to public access. It proposes to test hypotheses that more sites are vandalized, and vandalism is worse in areas having public access, proximity to roads, proximity to other sites, and high site visibility. While this investigation validates the general notion that road access and public access (including pedestrian and equestrian) may contribute to the indirect effect of increased site vandalism, the resources and conditions in Range Creek Canyon are very different than those on the Gila National Forest as a whole, and TM Project in particular. The entire Gila National Forest is public land, currently open to public access. Vandalism and looting of archeological sites, including severe vandalism, are present throughout the forest, including wilderness areas where there are no authorized roads and no motorized use is allowed. Difficult access, long hikes, horseback rides, and/or complete absence of motorized access do not preclude vandalism and looting from occurring illegally at cultural resource sites throughout the Gila. This is in contradiction to assumptions in Spangler et al. (2006:2), that people will not walk far to vandalize a site, and prefer sites they can see from a road. The travel management decision will designate a system of roads and motorized dispersed camping corridors that will control motorized access on the forest, thereby reducing indirect effects from opportunistic or easy vandalism. As a side effect, this may also provide some deterrence to the determined or professional looter willing to go as far as needed without easy public access. Spangler et al. (2006:8) say that uncontrolled vehicle access is a major factor in vandalism, and that controlled access contributes to site protection. Because the Gila's travel management decision will define and limit motorized access, potential for cultural resource looting and vandalism will be reduced. However, this decision will not control other types of public access, such as pedestrian and equestrian that may indirectly affect cultural resources, though these activities are controlled under other Federal law, regulation, and policy. The Range Creek Canyon study uses controlled access points, such as gates, to distinguish between public access and restricted access. While there are gates at some locations along NFS roads (for grazing allotments, private land, etc.), they are not managed by the forest as controlled access points in the sense used by Spangler, and this is a concept not found in the Gila's travel management designations and cultural resource analysis. Therefore, the measurements, methods, and analyses in Spangler are not directly comparable to assessing indirect effects to cultural resources in the Gila's Travel Management Project. Sites in the Range Creek Canyon study are located in cliffs on either side of the main road/ drainage. As such, they include many cliff dwellings, alcoves, rock art, rock shelters and associated sites

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		(granaries, etc.), highly visible from the main road through the canyon bottom. While the Gila has a number of similar canyons, most of its sites are not cliff dwellings visible from a major road, and many of its cliff dwellings are located in designated wilderness. Rubble mounds, pueblos, stone hearths, historic buildings, and prehistoric pithouses can sometimes be seen from roads on the forest, if people know what to look for. This is also true for pedestrians, dispersed campers, and equestrians. In other words, those with intent to vandalize cultural resources may recognize them and find a way to do harm, regardless of travel management designation. Forest users with little knowledge of cultural resources will be less tempted to do harm on the Gila than in Range Creek Canyon, because resources are generally less visible from locations with motorized access. The Gila National Forest has recently conducted a Looting and Vandalism Analysis that analyzes the distance a site is from a route and the presence or absence of looting or vandalism disturbances. Please, refer to the FEIS for a discussion of this study.
03072011-21-108c	Sullivan et al. 2002 and 2006 should be incorporated into impact assessment. ORV impacts should be analyzed on archeological sites using GIS, known impacts, and site significance. Sullivan et al. 2006 should be cited as Uphus et al. 2006.	The forest assigns levels of significance to all known cultural resource sites, per the criteria for the National Register of Historic Places (NRHP). Sites are determined (1) significant and eligible to the NRHP, (2) not significant and ineligible to the NRHP, or (3) undetermined or not sure, but treated as eligible to the NRHP. Cultural resource site locations are entered in the Gila National Forest's heritage GIS layers, where they have been compared with and superimposed on the forest road system, including all alternatives for travel management. Recently, the Gila National Forest conducted a Looting and Vandalism Analysis on 286 known prehistoric and historic structural sites, including petroglyphs and pictographs. Sites within the Heritage GIS Database were analyzed against all routes used to create the TM Alternatives. In GIS, a spatial join was used to identify and calculate the distance between sites and their closest route. These sites were then sorted within 100-meter interval distance bands (0 to 100 meters, 101 to 200 meters, etc.) from 0 to 1,800+ meters. The Hawthes Tool GIS Package was used to pick a random sample of 5 percent of sites per band. The forest then analyzed each site record for past impacts and disturbances using the Risk Analysis form. The main objective of the study was to determine if there was a relationship between the distance a site is located from a route and the presence or absence of looting or vandalism. Analysis results show a higher percentage of sites with disturbances like looting or vandalism near routes, however, more distant sites are experiencing these types of disturbances as well. To better understand and compare these results, the forest ran statistical analyses using Chi-square calculations with Monte Carlo Simulations. The forest considered a statistically significant relationship to be one that falls below or equal to the 95 percent confidence interval (p is less than or equal to 0.05). These analyses show no statistical difference between distance bands and the

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		number of sites that have these disturbances (where "$p\ \chi^2 \geq$ obs." represents the results of the Monet Carlo simulations: $p\ \chi^2 \geq$ obs. = 0.488; $p\ \chi^2 \geq$ obs. = 0.193; $p\ \chi^2 \geq$ obs. = 0.177). The results do not show a strong relationship between the distance a site is from a route and the presence or absence of looting and vandalism. Therefore, the presence of routes may not be a precursor for these disturbances. On the Gila National Forest, vandalism and looting occur forestwide. There are documented cases of people vandalizing and looting sites adjacent to routes that provided access to the area. However, there are also documented cases where individuals have hiked several miles into wilderness areas to participate in these illegal acts. Knowing this, factors like site type, size, and visibility may be more accurate indicators of vandalism and looting than the distance a site is from a route. This information was used to help determine if the area of potential effect (APE) for routes and MDC corridors were adequate for effects analysis. Please, refer to the cultural resources specialist report for a full discussion of the study. In regard to Sullivan et al. 2002 and Uphus et al. 2006, these studies cover "inadvertent vandalism" to cultural sites, caused by recreational camping and wood cutting, along a heavily used highway approaching the Grand Canyon and adjacent off-highway access. While this study demonstrates that these activities may inadvertently damage cultural resource sites at this location, the Gila National Forest has different levels and kinds of use, topography, site recording practices, types of cultural resource sites, management policies, legal compliance via Programmatic Agreement, and size of study area than those researched by Sullivan et al. This renders these studies minimally applicable to the Gila National Forest. However, these types of disturbances are recognized in the DEIS. The DEIS analyzes the potential risk of direct and indirect effects of motorized access to cultural resources (DEIS: 230–244). Some of the indirect effects of motorized access and MDC mentioned in the DEIS can be considered examples of 'inadvertent vandalism' discussed in Sullivan et al. 2002, specifically, the damaging, dismantling, or scavenging of prehistoric or historic sites for structural materials that can be used in fire rings or as fire wood (DEIS: 231, 236, and 242). To address the main points of the Sullivan and Uphus articles, the following information is provided. Roads and highways on the Gila are much more sparsely travelled than those accessing the Grand Canyon, with less recreational activity with the potential to damage cultural sites. Large wood-cutting areas (tens of thousands of acres) are designated each year on the forest. They receive cultural resource compliance or exemption under law, regulation and policy, require permits to cut wood (either commercially or privately), and green tree cutting is generally prohibited. On the forest, it

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		would not be practical to have gates that lock all access to woodcutting except by those with permits. The study area for the Gila consists of the entire forest and travel management alternatives, rather than a small area of concentrated use like that examined by Sullivan et al. 2002 and Uphus et al.2006. New Mexico LA site records require that human disturbance be documented, and site locations GPS'd. So, data are available (and were used) to identify existing and potential future site impacts relevant to the travel management decision. New Mexico site records require the recordation and mapping of all components of a site and site condition. However, site boundaries and/or buffered datum points are the only GIS components found in both State and Gila National Forest databases. Therefore, the forest would not be able to analyze the same type of mapping units as seen in the Uphus et al. 2006 article. The Gila has successfully pursued several civil Archaeological Resource Protection Act (ARPA) cases, and does not apply ARPA only to intentional criminal acts as is assumed in the Sullivan studies. The forest educates the public in No Trace principles. When the public fails to use No Trace principles, the Forest No Traces many fire rings, trash, and other disturbances at cultural sites, so that future recreationalists will not be encouraged to repeat these behaviors. No Trace recommendations are integral to managing cultural resources in all action alternatives for travel management on the Gila. The forest has already designated developed campgrounds, and it isn't practical, or responsive to the Travel Management Rule, to limit all camping to such locations as suggested in Sullivan et al. 2002 and Uphus et al. 2006. The Gila National Forest's recreation niche relates to less crowded dispersed camping; its topography and vegetation are relevant to site location and prevent camping in many locations, and its cultural resources are sometimes quite visible on the ground, such that damage is unlikely to occur inadvertently as much as in the Sullivan study area (i.e., it may be purposeful in some cases, which the Gila seeks to reduce or prevent). Brush structures are not a common recreation disturbance on the Gila, being virtually unknown in site records. For these reasons, the two articles by Sullivan et al. 2002 and Uphus et al. 2006 derive from a much different cultural and natural environment and management context than that of Gila National Forest. This makes the articles poorly applicable to Travel Management Project areas on the forest.
03052011-35-9	Looting will occur on cultural resource sites regardless of TM because access to sites is possible by accessing lands and routes not under Forest Service jurisdiction by foot.	We agree with your comment. One of the background assumptions outlined in the cultural resource specialist report states: On the Gila National Forest, most cultural sites exhibit some level of vandalism or looting, so the presence of this type of disturbance is not necessarily related to access provided by motorized routes or motorized dispersed camping (DEIS page 229). In the FEIS, this assumption will be modified to reflect the Looting and Vandalism Analysis.

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01192011-02-8 03052011-35-5 03072011-78-23	All proposed camping corridors should remain open until a survey provides a reason for them to be closed to motorized dispersed camping. Lack of funding will make it hard to complete surveys reducing public use.	In lieu of using the 36 CFR 800 regulations of the National Historic Preservation Act, the forest is complying with this law by following the USDA Forest Service, Region 3 Protocol regarding Section 106 consultation for Travel Management Route Designation (TM protocol) (USDA Forest Service, Southwestern Region; New Mexico State Historic Preservation Officer; Appendix I; 2007). The TM protocol is appendix I of the Southwestern Region Programmatic Agreement between the State Historic Preservation Officer, Advisory Council on Historic Preservation, and USDA Forest Service. Both the cultural resource programmatic agreement and TM protocol streamline and standardize the Section 106 consultation process for the forest (DEIS: 228). The TM Protocol outlines those actions that are exempt from and those that require Section 106 compliance and consultation, cultural resource inventory requirements, phasing, protection measures, monitoring, etc. Section 106 consultation and compliance is usually required for cultural resources before a NEPA decision is signed. However, sometimes phasing Section 106 for a project is necessary. The TM protocol allows for phasing up to three years after the travel management decision is signed. However, the TM Protocol also states that roads, trails, and areas (which include motorized dispersed camping corridors) “subject to phased surveys will not be shown on the maps distributed to the public until after the survey and Section 106 process is completed” (USDA Forest Service, Southwestern Region; New Mexico State Historic Preservation Officer; Appendix I; 2007).
03052011-35-8a	Direct or indirect effects relating to killing a large animal on a cultural site, including dragging, gutting, or other activities, may occur whether or not MBGR is designated.	The Gila National Forest agrees with this comment. These effects could be seen whether or not MBGR is designated. These are effects more related to hunting than the motorized retrieval of the animal. This statement of effects will be removed in the Final EIS.
03062011-15-2	Expresses concerns about cultural resources around Quaking Aspen Canyon off of McKnight Road. Supports alternative E as it closes most of the sensitive areas while leaving roads in order to access ample camping areas.	Thank you for your comment.

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03072011-25-5	Commends Forest for doing risk analysis. But, risk analysis is too restricted and should be used to evaluate alternatives for motorized routes and motorized dispersed camping corridors.	A process was developed to assess the existing condition of cultural resource sites located within TM project areas (see Revised Effects to Cultural Resources and Risk Analysis Form in appendix E of the final cultural resources specialist report). The objective of this process is to identify direct, indirect, and potential cumulative effects to cultural resources related to several categories of disturbance. The Risk Analysis description is confusing in the DEIS. To clarify, this analysis has been used several ways: First and foremost, the Risk Analysis is a tool that the Gila NF used to accurately record site condition for sites that have been or will be revisited or discovered through TM surveys. This tool has helped and continues to help identify cultural resources at risk for potential effects from each TM designation requiring Section 106 consultation and compliance. The presence, absence, and degree of each risk factor disturbance helps to determine site recommendations and proposed mitigations for potential TM effects. For this use, the Risk Analysis evolved to focus on motorized camping and motorized disturbances for Section 106 consultation and compliance (see appendix E in final cultural resources specialist report and Firebaugh-Smith and Knolles 2012). The Risk Analysis was used in the DEIS to identify general trends in impacts from MDC corridors and Areas to known sites within each Alternative and to support the idea that as MDC corridor miles/acres and Areas acres are reduced so do the number of sites with motorized dispersed camping impacts (DEIS: 236). However, the FEIS will not use this tool for MDC corridor or motorized area analysis. The Risk Analysis was not intended to be used as a measure or decision-making tool for NEPA analysis. In retrospect, it did not add a great deal of new information to either the MDC corridor or motorized area analysis. Therefore, it will be removed from the FEIS MDC corridor and motorized area analysis. However, the results from the Risk Analysis will be appendix D of the final cultural resources specialist report for reference. The Risk Analysis was also used in the DEIS and will be used in the FEIS in the cumulative effects discussion. The analysis tracked different kinds of disturbances to sites. While the Risk Analysis has not been updated, it still contains pertinent information that is beneficial in that discussion. These points were not explained clearly or separately in the DEIS. This is clarified in the FEIS. As stated, the use of the Risk Analysis in the DEIS was to simply identify the general trends in impacts from MDC corridors and motorized areas to known sites within each alternative and support the idea that as miles per acres are reduced for these actions, so do the number of sites with motorized dispersed camping impacts. In retrospect, the Risk Assessment does not add a great deal of new information to the overall

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		analysis. It is fairly evident that as miles per acres are reduced in different action alternatives, the number of known sites within each alternative also changes. It would also follow that sites with motorized camping disturbances would decrease as miles per acres are reduced. This would be true for impacts related to motorized routes, too. Therefore, there is no reason to extend the Risk Assessment to motorized routes.
03072011-25-6	Definition of "substantial impact" to cultural resources needs to be provided. They suggest defining this as sites that are National Register-listed, -eligible or unevaluated with the risk factor scores that are moderate or severe. The commenter also thinks mitigations of avoidance best meet the intent of the NHPA.	The term 'substantial impact' will not be used in the FEIS. Instead, 'adverse effect' will be used as it is defined by the NHPA 36 CFR 8005.a.1: "…an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may also include reasonably foreseeable effects that may occur later in time, be farther removed in distance or cumulative." Examples of such adverse effects include but are not limited to: • Physical destruction of or damage to all or part of the property • Alteration of a property, including restoration, rehabilitation, repair, etc. • Removal of the property from its historic location • Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance. • Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Risk Analysis scores should not be assumed to indicate an adverse effect. The Risk Analysis is a tool used to accurately describe the current site condition in relation to camping and motorized access. The presence, absence, and degree of these disturbances help to determine site recommendations and proposed mitigations. The presence of several, even many, risk factor disturbances do not necessarily indicate an adverse effect to the site. However, they may be a predictor for such effects. In such instances, the Gila National Forest, in consultation with SHPO and other consulting parties, will provide site-specific mitigations. Mitigations can be used to reduce present effects and reduce future ones. Such mitigations may include avoidance. However, the FEIS will display more potential mitigations for travel management effects to sites than just avoidance. These will include the list of mitigations provided through the TM Protocol and some suggested by

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		the Gila NF.
03072011-25-6a 03072011-25-7	Motorized Routes: There are significant differences among alternatives with respect to impacts on cultural resources. If there are increased impacts in alternative G, then there should be a reduction in number of miles designated in FEIS, for both motorized routes and motorized camping corridors.	This comment mistakenly states that the Motorized Route Analysis Table 144 on page 232 is displaying impacts or substantial impacts to cultural resources within motorized routes. The analysis actually displays the number of known cultural resources within the analyzed route system through each alternative. These sites may have potential risk for direct and indirect effect due to the designation of motorized routes (DEIS: 231–234). As the action alternatives in the DEIS present a range of options concerning access to NFS lands and resource protection, each shows a different number of proposed miles for motorized routes. The number of known sites at risk for potential direct and indirect effects will change as the number of miles changes per alternative. The alternatives with higher numbers of miles of routes show higher numbers of sites within the analyzed area. Because there are more known sites in these alternatives, there is a higher risk of potential direct and indirect effects to a larger number of sites. Therefore, alternatives that propose higher numbers of miles of routes within the analysis area pose a higher risk of effects to cultural resources than those that propose lower numbers of miles. Alternative G has a higher number of proposed routes than do either alternative D or E, therefore, there is a higher risk of the potential direct and indirect effects for sites in alternative G. Again, the Motorized Dispersed Camping (MDC) corridors analysis displays the number of known cultural resources within the analyzed MDC corridors through each alternative. These sites may have potential risk for direct and indirect effect due to the designation of MDC corridors (DEIS: 234, table 145). Each action alternative has a different number of proposed miles for MDC corridors. The number of known sites at risk for potential direct and indirect effects will change as the number of miles change per alternative. The alternatives with more miles of MDC corridors show more sites within the analyzed area. Because there are more known sites in these alternatives, there is a higher risk of potential direct and indirect effects to a larger number of sites. Therefore, alternatives that propose higher numbers of miles of MDC corridors within the analysis area pose a higher risk of effects to cultural resources than those that propose lower numbers of miles. Alternative G has a higher number of proposed MDC corridors than do either alternative D or E, therefore, there is a higher risk of potential direct and indirect effects (DEIS: 234–238). Neither NEPA nor the Travel Management Rule requires that the alternative with the least potential risk to known cultural resources be chosen. Note: In the DEIS, route analysis included existing routes with proposed changes in designations. NEPA requires only that the ‘change’ to the current condition be analyzed. For routes, only newly proposed routes, which include adding unauthorized routes, routes being re-opened, and routes

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		changing status from nonmotorized to motorized, are considered the change to the system. Therefore, existing routes changing designations should not have been included in the DEIS analysis. This is corrected in the FEIS. Also, some existing routes were inadvertently left out of the analysis and several miles of newly proposed routes have been added to some of the action alternatives in the FEIS. These miles are now represented in the analysis. Therefore, the numbers of miles in the analysis will not match those found in DEIS.
03072011-25-8	The Gila NF Section 106 review (TM Protocol) is inadequate because indirect effect s is not considered.	The Gila NF is following Appendix I: Standard consultation Protocol for Travel Management Route Designation of the Southwestern Region Programmatic Agreement (PA) between SHPO, Advisory Council on Historic Preservation, and USDA-Forest Service. The PA was developed pursuant 36 CFR 800.14 B which provides guidance for federal agencies to develop programmatic agreements. The PA under Stipulation IV.A.4 provides for the development of 'Standard Consultation Protocols' for certain classes of undertakings where effects on historic properties and resulting protection and treatment are similar and repetitive. Such protocols specify standard procedures for the identification, evaluation, and treatment of historic properties. In accordance with the Programmatic Agreement, in developing this protocol, the Forest Service consulted with the Arizona, New Mexico, Oklahoma, and Texas State Historic Preservation Officers (SHPOs), the Advisory Council on Historic Preservation (Council), and 50 Indian tribes for whom properties within National Forests might have traditional cultural or religious significance (USDA-Forest Service Southwestern Region; New Mexico SHPO; Appendix I; 2007). The TM Protocol was signed by the Forest Service, the Council, and the SHPOs in 2007, and formally incorporated into the Programmatic Agreement as Appendix I. As such, the forests may implement the procedures in this protocol, in lieu of standard consultation in the Programmatic Agreement or the Council's regulations (36 CFR §800), to take into account the potential effects of travel management designations on historic properties (USDA-Forest Service Southwestern Region; New Mexico SHPO; Appendix I; 2007). Through the development of the TM protocol, the direct, indirect, and cumulative effects of travel management were considered.
03072011-25-4	We strongly support limiting Motorized Big Game Retrieval (MGBR) to dispersed camping corridors. To the extent that motorized dispersed camping corridors are designated only in	Thank you for your comment. However, the idea that only MDC corridors should be designated where 'no impacts' to cultural resources occur is misleading. There may be a potential risk for direct and indirect effects related to TM designations on sites in proposed MDC corridors. However, these effects will be assessed for each site and potential adverse effects will be avoided or mitigated, as appropriate through site-specific recommendations during Section 106 consultation and compliance. Mitigations can be used to reduce present effects and minimize future effects. Such mitigations may

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	areas where there are no impacts to National Register or Register-eligible sites.	include avoidance. However, the FEIS will display more potential mitigations for travel management effects to cultural resources than just avoidance. These will include the list of mitigations provided through the TM Protocol and some suggested by the Gila NF.
03072011-25-8a	Motorized routes provide easy access to cultural sites, and sites closest to routes are more impacted. Looters will find it easier to loot sites close to roads. Apart from natural processes, looting is the single greatest threat to cultural resources on public lands. Deterrents should be seriously scrutinized. By definition, designating routes causes indirect effects related to access and proximity to cultural sites.	The Gila NF acknowledges that motorized routes provide ease of access to NFS Lands and the cultural resources located within them (DEIS: 230). This ease of access does create a potential for direct and indirect effects to sites. However, the current condition, alternative B, with cross-country travel provides the most access. After the Travel Management Rule is put in place, motorized cross-country travel will be prohibited. This means that vehicular off-road travel will not be permitted, except in appropriate MDC corridors, Motorized Areas, for MBGR, or under a special use authorization. Vehicles must stay in the confines of routes or corridors for driving; access outside of these routes will be reduced to foot traffic or other authorized access (equestrians, pack animals, special uses, for example). This will be highly beneficial to cultural resources by reducing access to sites located in areas that do not have designated routes (DEIS: 230). Motorized routes provide ease of access to Gila NF lands and the cultural resources located within them. However, all action alternatives prohibit motorized cross-country travel, which will greatly reduce access to forest lands and sites from the current condition. These ideas are presented in the DEIS on page 230. However, they will be plainly stated in the FEIS. Vandalism and looting are recognized as indirect effects of motorized access throughout the DEIS (pages 230–244). NEPA analysis considered potential risk to known Eligible and Undetermined sites in Areas, MDC corridors, MBGR corridors, and routes for each alternative. A different number of sites are subject to these potential risks, depending upon the number of miles per acreage proposed for each designation per alternative. In this way, the NEPA analysis, as described in the DEIS, fully explored the potential risk for direct and indirect effects for known cultural resources by alternative. The action alternatives in the DEIS present a range of options concerning access to NFS lands and resource protection. Where appropriate in the development of these alternatives, known conflicts with cultural resources were considered. These conflicts include direct and indirect effects of motorized access like, but not limited to, vehicular contact with features, artifacts, cultural deposits, looting/vandalism, dismantling or scavenging of cultural sites, etc. In some cases and depending upon the action alternative, the presence of these known conflicts resulted in excluding TM designations like areas, MBGR, or MDC in certain areas or along certain routes. For the same reason, some routes were proposed closed or proposed to remain closed in some of the action alternatives. Information gathered through TM Section 106 archaeological survey has provided more site-specific

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		information. With this information and as appropriate, the Gila NF, in consultation with SHPO and other consulting parties, will be able to able to minimize potential adverse effects through avoidance or mitigation measures through treatment recommendations including but not limited to fencing, monitoring, signing, no tracing fire rings and trash, or re-routing routes. This information has allowed the Gila NF to modify specific designations within the action alternatives. Furthermore, the Gila NF conducted a Looting and Vandalism Analysis on 286 prehistoric and historic structural sites, including petroglyphs and pictographs, within 100-meter interval distance bands (0 to 100 meters, 101 to 200 meters, etc.) from all routes used to create the Travel Management action alternatives. The main objective of the study was to determine if there was a relationship between the distance a site is located from a route and the presence or absence of looting or vandalism. The analysis results show a higher percentage of sites with disturbances like looting or vandalism near routes, however, sites farther away are experiencing these types of disturbances as well. To better understand and compare these results, the Gila NF ran statistical analyses using Chi-square calculations with Monte Carlo Simulations. The Gila NF considered a statistically significant relationship to be one that falls below or equal to the 95 percent confidence interval (p is less than or equal to 0.05). These analyses show no statistical difference between distance bands and the number of sites that have these disturbances (where "$p\ \chi^2 \geq$ obs." represents the results of the Monet Carlo simulations: $p\ \chi^2 \geq$ obs. = 0.488; $p\ \chi^2 \geq$ obs. = 0.193; $p\ \chi^2 \geq$ obs. = 0.177). The results show no strong relationship between the distance a site is from a route and the presence or absence of looting and vandalism. Therefore, the presence of the routes may not be a precursor for these disturbances. On the Gila NF, vandalism and looting occur forestwide. There are documented cases of people vandalizing and looting sites adjacent to routes that provided access to the area. However, there are also documented cases where individuals have hiked several miles into wilderness areas to participate in these illegal acts. Knowing this, factors like site type, size, and visibility may be more accurate indicators of vandalism and looting than the distance a site is from a route. Please, refer to the cultural resource specialist report for a full discussion of the analysis.
03072011-25-8b	A/S Cultural Resource Specialist Report documents issue of indirect effects on cultural resources due to accessibility. Several studies supporting these	The Gila NF has reviewed the Apache-Sitgreaves NF Cultural Resource Specialist Report and found its section on looting and vandalism well-articulated. However, the studies cited are directly related to the Apache-Sitgreaves and are also older studies from the late 1970s and 1980s. Instead of using these studies, the Gila NF decided to perform its own study. The Gila NF analyzed the presence or absence of looting and vandalism on sites and route proximity. The results of this analysis are

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	effects are referenced, and relevant pages are attached in Appendices to this comment. Center for Desert Archaeology did studies on the Tonto NF that indicate greatly increased recent damage to sites located near open motorized routes, compared to those farther away. Sites closer to motorized routes are also in poorer condition.	provided in the cultural resource specialist report. The Tonto NF study does report a statistically significant relationship between the condition of a site and its distance from an NFS road. This was true for sites within 300 meters of an NFS road. However, of the 96 sites in the study, 15 had recent human-related damage and 12 or 80 percent of these sites were within 200 meters of the NFS route. Only 3 sites with recent human damage were located beyond 200 meters. Also, the study plainly states in footnote 2 on page 5 that not enough sites were assessed past 500 meters to determine a statistical significance for site condition and road proximity at that distance or greater (Hedquist and Ellison 2010: 5). In fact, 37 of the 96 sites assessed were located within in 100 meters of a road, while road proximity was a determining factor in choosing sites for the study, an equal percentage of sites per distance from routes should have been chosen to better gauge a statistical significance of site condition and proximity of sites to NFS routes. Also, the study took most of its sample from Priority Heritage Assets, which are sites that have significant site-conditions issues, at times associated with human-related damage. Sites within the study had at least 10 rooms or prominent archaeological features, which are stated as being more likely to be visited by the public. With these criteria, the findings of the study are not surprising. The goal of the study was to “better understand the relationship between site conditions/damage and Tonto NF road proximity” (Hedquist and Ellison 2010:1). If this were the case, a more random sample of sites should have been chosen and assessed. This may have resulted in a more balanced approach to understanding the relationship between site condition or damage and road proximity. In fact, the Tonto NF looked at sites comparable to those listed as Priority Heritage Assets located within designated wilderness or more than a mile from any road. They found that as many as 75 percent of those sites had been vandalized. The Tonto NF concluded that site size and visibility may be the key to predicting vandalism and looting on the Tonto NF, not motorized access (USDA-Forest Service 2012: 79).
03072011-25-8c	Site accessibility is a significant factor in site impacts over time. The concept of “threshold distance” looks at how far from a motorized route differences can be identified in levels of site disturbance. Knowing this distance helps compare	The Gila NF conducted a Looting and Vandalism Analysis on 286 prehistoric and historic structural sites, including petroglyphs and pictographs, within 100-meter interval distance bands (0 to 100 meters, 101 to 200 meters, etc.) from all routes used to create the Travel Management action alternatives. The main objective of the study was to determine if there was a relationship between the distance a site is located from a route and the presence or absence of looting or vandalism. The analysis results show a higher percentage of sites with disturbances like looting or vandalism near routes, however, sites farther away are experiencing these types of disturbances as well. To better understand and compare these results, the Gila NF ran statistical analyses using Chi-square

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	Alternatives; the buffer distances used in the DEIS and R3 Protocol are inadequate to assess indirect effects. Various references indicate buffers from 150-300 meters are adequate to reduce and deter indirect site damage. Due to lack of data for the Gila, comment proposes using results of other studies and increasing buffer to 300 meters each side of every motorized route. This will better address indirect effects of route designation among Alternatives. As DEIS says, reduction in routes is beneficial to cultural resources.	calculations with Monte Carlo Simulations. The Gila NF considered a statistically significant relationship to be one that falls below or equal to the 95 percent confidence interval (p is less than or equal to 0.05). These analyses show no statistical difference between distance bands and the number of sites that have these disturbances (where "$p\ \chi^2 \geq$ obs." represents the results of the Monet Carlo simulations: $p\ \chi^2 \geq$ obs. = 0.488; $p\ \chi^2 \geq$ obs. = 0.193; $p\ \chi^2 \geq$ obs. = 0.177). The results do not show a strong relationship between the distance a site is from a route and the presence or absence of looting and vandalism. Therefore, the presence of the routes may not be a precursor for these disturbances. On the Gila NF, vandalism and looting occur forestwide. There are documented cases of people vandalizing and looting sites adjacent to routes that provided access to the area. However, there are also documented cases where individuals have hiked several miles into wilderness areas to participate in these illegal acts. Knowing this, factors like site type, size, and visibility may be more accurate indicators of vandalism and looting than the distance a site is from a route. Please, refer to the cultural resource specialist report for a full discussion of the analysis. The APE for Travel Management FEIS NEPA analysis is based on the current condition. For newly proposed routes, this APE will be 15 meters either side of the centerline. The Gila NF believes that this APE adequately measures and addresses direct and indirect effects, given the recommended minimum distances identified in the TM Protocol and the results of a recent looting and vandalism analysis. For motorized routes, the measure for determining relative or potential risk of designating newly proposed routes is the number of known sites within the analysis area. This is not plainly stated in the DEIS, however, it will be in the FEIS. The number of known sites per alternative is directly related to how many miles of motorized routes are proposed in each alternative. The alternatives with higher numbers of miles show higher numbers of known sites, and vise-versa. Therefore, the alternatives that propose more motorized routes will also pose a higher risk to cultural resources. A measure and comparison of risk per alternative can be determined whether the analysis area is represented by a few meters or hundreds of meters. As for analyzing every route in the system, NEPA analysis considers only the 'change' to the existing condition. Changes include proposals like motorized big game retrieval (MGBR), motorized dispersed camping (MDC) corridors, areas, and newly proposed routes. Existing routes (roads and trails) that are part of the existing National Forest System are not being analyzed. Only those routes that are being newly added to the system will be analyzed. These routes include unauthorized routes, routes being re-opened, and routes changing status from nonmotorized to motorized.

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03072011-25-8d	Commenter views dispersed camping corridor as a wide road. Assessment of effects for corridors fails to address indirect effects; an area 300 m either side of road needs to be assessed. All Sec. 106 cultural surveys conducted for corridors should be expanded to 300 meters either side to adequately assess indirect effects.	The Assumptions and Limitations Common to all Alternatives section on page 44 of the DEIS addresses use of MDC corridors: Corridors for the purpose of motorized dispersed camping are meant solely for the purpose of dispersed camping. Most of these corridors encompass traditional camping sites. Motorized access would be direct ingress and egress to the camping spot and the camp would be the base of activity. These corridors are not open to unrestrained motor vehicle use. For analysis purposes, the interdisciplinary team will assume compliance. The APE for Travel Management FEIS NEPA analysis is based on the current condition. For MDC corridors, the APE is 300 meters either side of the centerline. The Gila NF believes that this APE adequately measures and addresses direct and indirect effects, given the recommended minimum distances identified in the TM Protocol and the results of a recent looting and vandalism analysis. As for archaeological survey for TM, the Gila NF is following Appendix I of the Southwestern Region Programmatic Agreement (PA) between SHPO, Advisory Council on Historic Preservation, and USDA-Forest Service. The Gila NF, in consultation with SHPO, has determined the APE of MDC corridors to be 300 feet either side of the centerline of the road that is proposed for this use (Firebaugh-Smith and Knolles 2012).
03072011-25-9	Based on previous discussion of direct and indirect effects, specific recommendations are provided in Appendix C for closure of roads located in Motorized Routes and Motorized Dispersed Camping Corridors. These recommendations are based on cultural resource sites in Coalescent Communities Database and associated NSF project.	Specific recommendations regarding motorized routes and motorized dispersed camping corridors are being addressed by the Ranger Districts. As this comment says, the Coalescent Communities Database is very limited in comparison to the total number of cultural resources on the Gila NF that were addressed for Travel Management. (It has been superseded by the Southwest Social Networks Database. It contains only resources larger than 12 rooms, dating from A.D. 1200–1450, located west of the Continental Divide, and primarily in Arizona. Primary focus of those creating and using this database has been on analyzing existing artifact collections to pursue their research.) The Gila NF does not use this database as it is a private research project, and some sites in the database are not located on forest-administered lands. The Gila NF uses the Forest Heritage database and GIS layers, and State of New Mexico's ARMS database for all project work. These databases provide the most up-to-date locational information for the Gila NF.
03072011-25-10	Decisions to implement Travel Management designations will cause cultural resource sites to be subjected to continued,	Some data suggest past activities on the forest have impacted cultural resources before Section 106 of the National Historic Preservation Act was fully implemented on the forest in the mid-1970s. However, present and foreseeable projects will go or have gone through Section 106 consultation and compliance using the Southwestern Region Heritage PA (DEIS 2010: 246).

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	cumulative impacts over time, eventually resulting in destruction of irreplaceable resources. Nature of these effects needs to be better articulated in FEIS, in order to apply appropriate mitigation measures.	The prohibition of unrestricted motor vehicle travel and the designation of a system of roads, trails, and areas, along with managed MDC and MBGR corridors will reduce risk to cultural resource sites (DEIS: 230–243). The direct and indirect effects of the alternatives are discussed in the DEIS, pages 230–243; and the cumulative effects are disclosed on pages 244–247, and based on the present and reasonably foreseeable future actions listed in the DEIS there will not be an increase in effects to cultural resources across the forest. The cumulative section of the FEIS will have some added information, but will remain largely as seen in the DEIS. However, FEIS will clearly state that when the effects of TM are added to effects of past, present, and reasonably foreseeable projects, there should be a decrease in negative cumulative effects and an increase in beneficial cumulative effects to cultural resources across the forest.

General

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01072011-15	No comment included	No content included for consideration.
01132011-02-1 01152011-25-1a 01152011-44-2 01182011-05-2 01182011-08-3 02072011-01-2 02082011-01-1 02212011-01-3 02242011-04-1 02262011-06-3 02262011-07-3 02272011-01-7 02282011-07-2 02282011-11-2 03042011-03-1 03042011-08-2 03042011-09-1 03042011-11-5 03042011-17-1 03042011-20-6 03042011-51-1 03052011-06-2 03052011-13-1 03052011-34-2 03062011-07-4/17 03062011-11-1a 03062011-12-1 03062011-29-2 03072011-19-5 03072011-24-1 03072011-26-1 03072011-42-1 03072011-72-3 03072011-84-2 03072011-86-5 03072011-106-1 03072011-115-4	Motorized travel restrictions will have impacts on aging or people with disabilities. This includes the ability to access sites and places; retrieve big game and dispersed camping.	Special provisions aimed at providing people with disabilities motorized opportunities not available to all forest users have not been included in the DEIS. In the comments and responses on the 2005 Motorized Travel Rule published on November 9, 2005, in the Federal Register, the agency states: “Under section 504 of the Rehabilitation Act of 1973, no person with a disability can be denied participation in a Federal program that is available to all other people solely because of his or her disability. In conformance with section 504, wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle in § 212.1 of the final rule, even if they are battery powered. However, there is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use because such an exemption could fundamentally alter the nature of the Forest Service’s travel management program (7 CFR 15e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory” (Federal Register, Vol. 70, No. 216, page 68285). This concept also applies to providing special provisions for aging populations that may have limited mobility. There is a range of road and trail miles available for motorized uses in all action alternatives and areas and corridors in alternatives C, D, F, and G that is proposed open to all users for motorized vehicle travel. Senior citizens and persons with disabilities will have the same access rights as the general public.

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03072011-125-2 03072011-164-2 03072011-205-2		
01152011-43-2	Due to age, I am no longer able to climb and backpack for days on. It is important that you hear that people who can't go where they used to go still want to preserve the biodiversity in peace and quiet. 96,000 acres of camping and game retrieval access is a lot.	Thank you for your comment.
02162011-02-1	Comment regarding politicians and anti-wolf legislation.	Thank you for your comment. Legislation related to wolves is outside the scope of this project
02162011-04-1 02162011-05-1 03022011-04-1 03022011-07-1 03022011-035 to 135-1 03032011-022 to 60-1 03042011-059 to 071-1 03052011-040 to 045-1 03062011-052 to 066-1 03072011-20-1 03072011-68-1 03072011-76-1 03072011-105-1 03072011-134-1 03072011-0413 to 0416-1	Comment supporting the Center for Biological Diversity's recommendations for protecting the Gila National Forest from impacts of off-road vehicle use.	Thank you for the comment. The Center for Biological Diversity submitted comment letter number 03072011-21. The response to the comments provided by the Center for Biological Diversity can be found in this document.
02282011-01-1	Is Travel Management a method to address the problem with OHV cross country use and environmental impacts or limiting the public from using or accessing the forest?	The Travel Management Rule "Background" section provides the need for the Rule and changes in regulations (Federal Register Vol. 70, No. 216; November 9, 2005; pages 68264-68265). In summary, the need for the Rule is a result of the change in technology of off-highway vehicles (e.g., capability, power); the increase in number and types of vehicles; and increase use on public lands. The magnitude and intensity of motor vehicles on public lands has increased to where the intent of the Executive Orders related to the use of off-road vehicles on public lands which direct agencies to ensure that use will be controlled and directed so as to protect the resources of those lands, to promote safety of all users of those

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		lands, and to minimize conflicts among the various uses of those lands is not being met. The Forest Service acknowledges that motor vehicles are a legitimate and appropriate way for people to enjoy national forests, but needs to be done in the right places and with proper management.
03072011-122-2/3 03072011-124-1	Concerned about access to airstrips either by air or by road access. Road access for continued maintenance of airstrips for use.	The designation of airstrips for continued use by aircraft is not part of travel management, as aircraft are exempt from the Travel Management Rule (36 CFR 212.51(a)(1)). The Forest intended that roads accessing airstrips remained open to motor vehicle through the designation process.
03072011-133-1	Should not be spending money or time on this project.	Thank you for your comment. 36 CFR 212.51(a) requires every National Forest and National Grassland to designate a system of National Forest System (NFS) roads, NFS trails, and areas on NFS lands for motor vehicle use.

Implementation

Letter/ Comment #	Summary Statement	Implementation - Response to Comments
01102011-06-2 01152011-02-2 01302011-02-3 03062011-04-15 03062011-06-7 03072011-78-41	Roads and trails must be signed and motorized trails include allowable vehicle types. Closed signs should be posted on roads and trails.	The Forest Service will continue to use signs widely to provide information and inform users on a variety of topics, including regulations and prohibitions. We recognize that signs help people orient themselves. However, the agency has found that posting routes as open or closed to particular uses has not always been effective in controlling use. Requiring each undesignated route and area to be posted as closed would be an unreasonable and unnecessary burden on agency resources and would tend to defeat the purpose of the final rule. Signs have also proven difficult to maintain and subject to vandalism. The final rule places more responsibility on users to have a copy of the motor vehicle use map from Forest Service offices or websites and to remain on routes and in areas designated for motor vehicle use regardless of whether or not a sign is present.
01182011-08-2	By closing these roads that everyone uses you will be creating more of a problem because people will still use them.	Forest Service law enforcement personnel play a critical role in ensuring compliance with laws and regulations, protecting public safety, and protecting National Forest Resources. The Forest Service also maintains cooperative relationships with other law enforcement agencies. Education and cooperative relationships with user support enforcement efforts by promoting voluntary compliance. Outreach, education, and time are fundamental for implementing changes in travel management.
01192011-02-43	Concern of the scale of the motor vehicle maps for being able to read and be usable.	The motor vehicle use map (MVUM) identifies the designated roads, trails and areas open to the public for motor vehicle use. The concern over the scale and lack of geographic features on the MVUM for navigation purposes is valid. On a national and regional level, digital travel aid products have been and continue to be developed to aid the public in understanding travel management designations. Some examples are downloadable travel management designation data or maps for GPS units and various color map products.
01192011-02-9 02262011-04-3 02262011-09-2 03022011-32-6/19 03042011-48-3/6a 03072011-67-1a 03072011-78-58/62	Concern that search and rescue efforts or access for emergencies and fires will be hindered with route closures and elimination of cross-country travel. Concern that local government	Vehicles responding to or that are needed for activities such as search and rescue; fire, law enforcement, etc., are exempt under 36 CFR §212.51 from the designations. This section of the rule states that motor vehicle use on roads, trails and areas shall be designated by the responsible official, *"provided that the following vehicles and uses are exempted from these designations:* *(4) Limited administrative use by the Forest Service;*

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03072011-89-1 03072011-96-8 03072011-125-3 03072011-216-1	emergency services will be impacted by road closures to serve their citizens.	*(5) Use of any fire, military, emergency, or law enforcement vehicle for emergency purposes;* *(7) Law enforcement response to violations of law, including pursuit* Travel management maintains access to private lands and subdivisions within the National Forest boundary. Many of these parcels are accessed by Federal, State, and County roads which are not part of the motor vehicle designation process.
01182011-02-2a 01242011-01-3 01252011-02-1 01262011-06-3 01292011-07-2 02072011-06-6 02102011-05-2 03042011-23-2 03042011-26-1/2 03042011-26-3 03052011-35-4 03042011-37-2 03062011-04-4 03062011-48-7 03072011-52-3/4 03072011-78-108 03072011-86-6 03072011-183-1 03072011-219-1	Concern that enforcement will be limited or ineffective after implementation. Educating people, providing information, and showing examples are optimal methods that are more effective.	Forest Service law enforcement personnel play a critical role in ensuring compliance with laws and regulations, protecting public safety, and protecting national forest resources. The Forest Service also maintains cooperative relationships with other law enforcement agencies. Education and cooperative relationships with user support enforcement efforts by promoting voluntary compliance. Outreach, education, and time are fundamental for implementing changes in travel management.
02032011-04-2	Concern that maintenance of signing and education for motorized dispersed camping will be difficult. Suggest signing sensitive or overused areas.	Thank you for your comment. The Forest Service will continue to use signs widely to provide information and inform users on a variety of topics, including regulations and prohibitions. However, the agency has found that posting routes as open or closed to particular uses has not always been effective in controlling use.

Letter/ Comment #	Summary Statement	Implementation - Response to Comments
02102011-03-2 03072011-21-95 03072011-18-15	The Forest needs a monitoring plan to assess damages or use in valuable resources areas and close if necessary.	The Travel Management Rule requires that we monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). The forest will develop a monitoring plan to evaluate the effects of motor vehicle use on the designated system.
03042011-04-5/13 03072011-78-22 03072011-96-7	After the drafts preferred alternative G, is implemented, we still won't know how many road closures will still occur. The USFS have given themselves a further 3 years to do cultural clearances on roads that are remaining open.	An alternative has not been selected by the responsible official. The final alternative selection will be documented in the Record of Decision. Cultural surveys only need to occur on changes or proposals to the motorized system. These include: motorized dispersed camping corridors, areas, and route designations such as adding unauthorized routes to the system of NFS roads or motorized trails, re-opening of closed or decommissioned routes, and converting closed roads to motorized trails. NFS roads currently open to motor vehicles and are proposed to stay open to the public for motor vehicle use, are exempt from surveys. If changes are found to be needed based on survey results, those changes would be related to the list above.

Invasive Species

Letter/ Comment #	Summary Statement	Invasive Species - Response to Comments
01192011-02-31a 03022011-15-39a	Other forest activities and uses contribute to the cumulative effects of the spread of invasive plant species.	Cumulative effects of the proposed action and alternatives on the distribution, establishment and spread of invasive plant species are disclosed in the DEIS on page 226 and clarified in the updated invasive species specialist report and FEIS.
01192011-02-31b 03022011-15-39b	The FS assumes that motorized use is the only vector needing management with Alternative B contributing the most with no data to support this assumption.	The Forest Service recognizes that invasive plants can be distributed, by a variety of pathways other than motorized vehicle travel. This is disclosed in the Invasive Species Cumulative Effects section on page 226 in the DEIS and clarified in the updated invasive species specialist report and in the FEIS. Alternative B (no action) is used as a baseline to compare the amount of opportunity for motorized vehicle travel to occur and contribute to the potential for invasive plant species introduction, establishment and spread, to the other alternatives. See invasive species specialist report page 4. In addition, the updated invasive species specialist report and FEIS clarify this concept.
03022011-15-39c 03072011-21-141	Correct the DEIS and supporting documents to reflect the effects to invasive species in relation to the amount of motorized use; or if not known, state as such. An accurate DEIS is needed for the decision maker to make a defensible choice.	The direct, indirect, and cumulative effects of the proposed action and alternatives on the introduction, establishment, and spread of invasive species are disclosed on pages 224–226 in the DEIS. In addition, the updated invasive species specialist report clarifies the relationship between the miles/acres of authorized travel routes, big game retrieval and dispersed camping, and how the differences in alternatives affect the amount of risk for invasive species introduction, establishment and spread. This is also reflected in the FEIS. Also see response for 03022011-15-39b.
03042011-30-3	Road intrusions introduce invasive weeds destroying habitat and creating need for efforts to combat them.	The Forest Service recognizes that invasive plants can be distributed, by a variety of pathways other than motorized vehicle travel. This is disclosed in the Invasive Species Cumulative Effects section on page 226 in the DEIS and clarified in the updated invasive species specialist report and in the FEIS. The direct, indirect and cumulative effects of the proposed action and alternatives on the introduction, establishment and spread of invasive plant species are disclosed in the DEIS, pages 224–226.
03072011-18-7 03072011-69-23	Discussion about the road impacts to invasive species is in adequate.	The direct, indirect, and cumulative effects of the proposed action and alternatives on the introduction, establishment, and spread of invasive plant species are disclosed in the DEIS, pages 224–226. In addition, the invasive species specialist report will be updated to include further information that

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		addresses the significance of invasive species impacts to forest, aquatic and grassland ecosystems.
03072011-18-7a 03072011-69-23	The analysis lacks discussion about non-native aquatic invasive species.	Thank you for pointing this out. The invasive species specialist report and DEIS were in error when stating no invasive aquatic species occur in the project area. We acknowledge that American bullfrogs, crayfish and non-native fish are present in the project area. The updated invasive species specialist report and the FEIS will include aquatic invasive species information and analysis.
03072011-21-141a 03072011-37-6 03072011-53-9	Motorized routes serve as corridors for exotic plant and disease invasion.	Thank you for this information. The direct, indirect and cumulative effects of the proposed action and alternatives on the introduction, establishment and spread of invasive species are disclosed on pages 224–226 in the DEIS. In addition, the updated invasive species specialist report clarifies the relationship between the miles/acres of authorized travel routes, big game retrieval and dispersed camping, and how the differences in alternatives affect the amount of risk for invasive species introduction, establishment and spread. This will be updated in the FEIS.
03072011-21-141b	Motorized access to known populations of salt cedar along the Gila River should be prohibited or restricted.	The updated invasive species specialist report and referenced Gila River Salt Cedar Environmental Assessment (2006) address management activities such as inventory, treatment, and monitoring for this invasive species which is specific to the West, Middle, East Forks, main stem, and tributaries of the Gila River. Some alternatives provided variance in the motorized opportunities along the Gila River that may result in reduction or change to vehicle access to areas with salt cedar.
03072011-21-146/147	Inadequate discussion in the invasive species specialist report about the effects of the alternatives on invasive species.	The direct, indirect and cumulative effects of the proposed action and alternatives on the introduction, establishment and spread of invasive species are disclosed on pages 224–226 in the DEIS. In addition, the updated invasive species specialist report clarifies the relationship between the miles/acres of authorized travel routes, big game retrieval and dispersed camping, and how the differences in alternatives affect the amount of risk for invasive species introduction, establishment, and spread. This is also reflected in the FEIS.
03072011-21-146a	The Forest Service should inventory areas adjacent to proposed motorized routes.	It is not feasible to inventory all routes proposed by the alternatives, however invasive species management for the Gila National Forest includes varying degrees of inventory, treatment, and monitoring. Please refer to the updated invasive species specialist report for information on inventory and other integrated management activities for invasive species.
03072011-21-146b	The Forest Service needs to address infestations of salt	Known salt cedar infestations adjacent to roads along on the Gila River are currently managed under the direction of the 2006 Salt Cedar Environmental Assessment. Also please refer to response

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	cedar and Russian olive in riparian areas.	03072011-21-141b. Other exotic species such as Russian olive are a major concern and will be addressed in future analyses.
03072011-21-146c 03072011-69-23b	The Forest Service needs to evaluate the number of road miles in riparian and the number of stream crossings in infested areas.	The direct, indirect, and cumulative effects of the proposed action and alternatives on the spread of invasive plant species in riparian areas or at stream crossings are disclosed in the original invasive species specialist report, and will be further clarified and updated in the final invasive species specialist report.
03072011-69-23a	There is no data on the existing weed infestations.	The invasive species specialist report will be updated to disclose weed infestations, past treatments, and monitoring activities by district on the Gila National Forest.

Laws, Regulation, and Policy

Letter/ Comment #	Summary Statement	Laws, Regulation, and Policy - Response to Comments
01152011-25-2	NM statute 72-1-1 applies to navigable waters, request if it applies to this project.	This statute does not apply to travel management process. Under 36 CFR 261.13, motor vehicle use, watercraft are exempted from the prohibition of the designations pursuant to 36 CFR 212.51 and identified on the motor vehicle use map (MVUM).
01192011-02-47 03012011-12-1 03032011-17-7 03042011-21-1 03052011-37-3 03052011-38-3 03062011-07-10 03062011-50-8 03072011-11-3 03072011-15-1 03072011-16-3 03072011-([16-001] to [16-662])-3 03072011-60-1 03072011-75-1 03072011-78-74 03072011-(0236 to 0255)-3 03072011-(0276 to 0373)-3	The Forest Service should not close open roads because it is illegal and the rule is not constitutional.	It is not illegal or a misuse of regulations for the Forest Service to close roads nor is the Travel Management Rule not constitutional. Article IV, Section 3 of the Constitution provides: The Congress shall have Power to dispose of and make all needful Rules and Regulations respecting the Territory or other Property belonging to the United States; and nothing in this Constitution shall be so construed as to Prejudice any Claims of the United States, or any particular State. Congress has exercised this power in relation to national forests by, among other things, providing for the establishment of forest reserves, providing for their management, and establishing the Forest Service. The Forest Service Organic Act of 1897 authorizes the Secretary (the Transfer Act of 1905 made this the Secretary of Agriculture) to establish regulations for the use and protection of the national forests. The Secretary has exercised this authority by adopting final travel management regulations at 36 CFR 212 and 261. Those regulations direct local agency responsible officials (forest supervisors and district rangers) to designate roads, trails, and areas for motor vehicle use, and (once those designations have been identified on a motor vehicle use map) prohibit motor vehicle use inconsistent with those designations.
01152011-57-1 03022011-17-1 03022011-32-1b/1c/1e 03042011-17-5 03052011-37-5 03052011-38-5 03062011-07-10 03062011-30-3	The forest needs to be managed for multiple uses.	The Travel Management Rule states: Multiple-use Sustained Yield Act gives “the Forest Service broad authority to manage NFS lands for multiple uses. MUSY defines ‘‘multiple use’’ in part as ‘‘management of all the various * * * resources of the National Forests so that they are utilized in the combination that will best meet the needs of the American people * * *.’’ MUSY specifically provides ‘‘that some land will be used for less than all of the resources’’ (16 U.S.C. 531(a)).” (Page 68272; Federal Register Vol. 70, No. 12) The Act does not direct that all NFS lands be open to all uses. Gila National Forest is managed under the principles of sustained multiple use as directed under the Multiple-use Sustained Yield Act and other legislation relating to the national forests. In carrying out

Letter/ Comment #	Summary Statement	Laws, Regulation, and Policy - Response to Comments
03072011-10-3 03072011-16-5 03072011-([16-001] to [16-662])-5 03072011-18-3 03072011-53-3 03072011-67-1a 03072011-78-7/8/12/24/27/82 /85/89/115 03072011-79-1 03072011-96-6 03072011-104-4 03072011-115-3 03072011-127-3/5/8 03072011-173-2 03072011-199-2 03072011-(0236 to 0255)-5 03072011-(0276 to 0373)-5		this task, the Forest Service strives to manage timber, livestock grazing, mining, and outdoor recreation in a manner that is environmentally sustainable over the long term. The purpose and need incorporates through compliance with the Travel Management Rule the elements of developing a transportation system to meet increasing demand for recreational opportunities and providing a range of quality experiences; reducing adverse impacts caused by unmanaged uses; and aligning travel and recreation opportunities with the management capabilities of the forest. By meeting these objectives, we hope to satisfy our mandate of multiple-use management. However, we realize that parties with competing interests may feel they don't get everything they request, and may perceive the decision in different ways.
03012011-09-1a 03022011-32-1e 03032011-12-7 03042011-17-2 03052011-37-3 03052011-38-3 03062011-07-10 03072011-16-3 03072011-([16-001] to [16-662])-3 03072011-78-4/6/82/83 03072011-(0236 to 0255)-3 03072011-(0276 to 0373)-3	Congress has set forth the authority of the agency in several highly relevant laws. The Organic Act of 1897. The Forest Service's original authorizing legislation explicitly permits virtually unlimited public access to national forests. Congress set forth in the Organic Act that everyone shall have free access to the forest.	Under the “Public and Private Uses” section of The Organic Act of 1897, part 7 states: *Nothing herein shall be construed as prohibiting the egress or ingress of actual settlers residing within the boundaries of such reservations, or from crossing the same to and from their property or homes; and such wagon roads and other improvements may be constructed thereon as may be necessary to reach their homes and to utilize their property under such rules and regulations as may be prescribed by the Secretary of the Interior. Nor shall anything herein prohibit any person from entering upon such forest reservations for all proper and lawful purposes, including that of prospecting, locating, and developing the mineral resources thereof:* ***Provided****. That such persons comply with the rules and regulations covering such forest reservations.* Part 8 states: *The public is entering, crossing and occupying the reserves, for the purposes enumerated in the law, are subject to a strict compliance with the rules and regulations governing the reserves.* The Organic Act allows access into and within the Gila National Forest, but states that there would be compliance with the rules and regulations covering such areas. The Travel Management Rule is one

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		of those rules established by the Forest Service. This has been established through Congress exercising their power in relation to national forests by, among other things, providing for the establishment of forest reserves, providing for their management, and establishing the Forest Service. The Forest Service Organic Act of 1897 authorizes the Secretary (the Transfer Act of 1905 made this the Secretary of Agriculture) to establish regulations for the use and protection of the national forests.
03022011-32-1e 03062011-34-4 03052011-37-3 03052011-38-3 03062011-07-10 03072011-16-3 03072011-([16-001] to [16-662])-3 03072011-78-6/8/25 03072011-(0236 to 0255)-3 03072011-(0276 to 0373)-3	The Forest Plan guidance was established prior to the development of the Rule in 2005. We therefore believe that the Draft, in relying on compliance with the 1986 Forest Plan, is only minimally compliant with the Rule.	Under the National Forest Management Act, project-level decisions, including designation of routes for motor vehicle use, must be consistent with the applicable land management plan. If a proposed designation is not consistent with the land management plan, the responsible official must either change the proposed designation or propose an amendment to the plan. (Federal Register, Vol. 70, No. 216, pages 68278–68279). Forest plan amendments are discussed on DEIS pages 17 and 45.
03042011-16-6	Disclose the legal authority for road closure.	Forest Service regulations at 36 CFR part 212 governing administration of the forest transportation system, and regulations at 36 CFR part 295 governing use of motor vehicles off National Forest System roads are combined and clarified in the Travel Management Rule, covering the use of motor vehicles on NFS lands. These regulations implement Executive Order (E.O.) 11644 (February 8, 1972) as amended by E.O. 11989) May 24, 1977. These executive orders direct Federal agencies to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.
03052011-37-3 03052011-38-3 03062011-07-10 03072011-16-3 03072011-([16-001] to [16-662])-3 03072011-78-6/7	The forest needs to follow the National Forest Roads and Trail Act which explicitly states that meeting increasing access demands is paramount.	The referenced act does not require the current designation of a system that anticipates some indeterminate level of future growth. Under the Travel Management Rule, there is a provision to monitor the designations of motorized system and adjust if needed.

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03072011-(0236 to 0255)-3 03072011-(0276 to 0373)-3		
03052011-37-3 03052011-38-3 03062011-07-10 03072011-16-3 03072011-([16-001] to [16-662])-3 03072011-78-9 03072011-(0236 to 0255)-3 03072011-(0276 to 0373)-3	The Forest needs to follow the Symms National Recreation Trails Act.	This act is specific to trails or trail-related projects which are identified in, or which further a specific goal of, a trail plan included or referenced in a Statewide Comprehensive Outdoor Recreation Plan required by the Land and Water Conservation Fund Act. The act has specific guidance for Federal agencies: *(1) COOPERATION BY FEDERAL AGENCIES- Each agency of the United States Government that manages land on which a State proposes to construct or maintain a recreation trail pursuant to this part is encouraged to cooperate with the State and the Secretary in planning and carrying out the activities described in subsection (e). Nothing in this part diminishes or in any way alters the land management responsibilities, plans and policies established by such agencies pursuant to other applicable laws.*
03062011-01-3 03072011-78-15/20	The reduction of 94.8 percent in access is a violation of the public trust doctrine.	The reduction of access to streamside areas as proposed in the Gila's Travel Management planning only pertains to the use of motorized vehicles in those areas. Public use and access by foot or other nonmotorized means to streamside areas is not restricted. Therefore, public use and access to these areas are maintained.
03072011-78-79	The Forest Service has no statutory authorization to exclude any lawful activity based on philosophical, cultural, or personal values differences between forest visitors pursuing lawful activities.	Forest Service regulations at 36 CFR part 212 governing administration of the forest transportation system, and regulations at 36 CFR part 295 governing use of motor vehicles off National Forest System roads are combined and clarified in the Travel Management Rule, covering the use of motor vehicles on NFS lands. These regulations implement Executive Order (E.O.) 11644 (February 8, 1972) as amended by E.O. 11989) May 24, 1977. These executive orders direct Federal agencies to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. The president's power to issue executive orders comes from Congress and the U.S. Constitution. Executive orders do not require congressional approval. Thus, the president can use them to set policy while avoiding public debate and opposition.

Letter/ Comment #	Summary Statement	Laws, Regulation, and Policy - Response to Comments
03072011-179-4	The forest should be virtually roadless.	The Gila National Forest disagrees. National forests are managed by law for multiple use. The Travel Management Rule does not prohibit the management of National Forest System (NFS) lands for multiple use as provided in the Multiple-use-Sustained Yield Act of 1960 (MUSY). MUSY authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range, water, recreation, and wildlife on the national forests for multiple use and sustained yield of the products and services. Currently, there are 792,584 acres designated wilderness within the Gila National Forest and managed as Primitive and Semi Primitive under the recreation opportunity spectrum (ROS). The Forest Plan standards and guidelines direct the management of 678,788 acres of inventoried roadless areas to be managed to maintain their existing semi-primitive R0S. The designations identified for ROS within the Forest Plan are objectives to meet management goals to optimize users' recreational experiences on the Gila National Forest. The remaining 1,973,771 acres are to be managed for semi-primitive motorized, roaded natural, and rural ROS.
03072011-198-1	You have no right to close anything without our opinions or decisions. We have the right to go where ever we want on our public lands. Leave our forest alone, no closings or closings of roads.	Forest Service regulations at 36 CFR part 212 governing administration of the forest transportation system, and regulations at 36 CFR part 295 governing use of motor vehicles off National Forest System roads are combined and clarified in the Travel Management Rule, covering the use of motor vehicles on NFS lands. These regulations implement Executive Order (E.O.) 11644 (February 8, 1972) as amended by E.O. 11989) May 24, 1977. These executive orders direct Federal agencies to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. The Draft Environmental Impact Statement for Travel Management on the Gila National Forest includes a range of possible alternatives. The alternatives were developed based on public comments. The public involvement process, concerns, issues, and alternatives to address these, are described in the DEIS chapter 2.
02272011-01-4	Have you defined motorized vehicles somewhere? Would that include mountain bikes? How about electric powered vehicles? When are you going to tell us that horses are too destructive and ban them too?	Motor vehicles are defined in the Travel Management Rule under CFR 36 Part 212.1 Definitions. A motor vehicle is any vehicle which is self-propelled, other than (1) a vehicle operated on rails; and (2) any wheelchair or mobility device, including one that is battery-powered, that is designed solely for use by a mobility-impaired person for location, and that is suitable for use in an indoor pedestrian are. Mountain bikes do not fit the definition of a motor vehicle. Self-propelled electric powered vehicles would fit the definition of a motor vehicle. The Travel Management Rule is focused on motor vehicle use. The use of horses is outside the scope of this project.
03042011-04-4	Reversing to closed unless	Forest Service regulations at 36 CFR part 212 governing administration of the forest transportation

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	marked open will cause lots of confusion and is totally not necessary and shows no concern for the use of the forest by the public. I saw no reason given for this, so think it an un-necessary change.	system, and regulations at 36 CFR part 295 governing use of motor vehicles off National Forest System roads are combined and clarified in the Travel Management Rule, covering the use of motor vehicles on NFS lands. These regulations implement Executive Order (E.O.) 11644 (February 8, 1972) as amended by E.O. 11989) May 24, 1977. These executive orders direct Federal agencies to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.

NEPA Process

Letter/ Comment #	Summary Statement	NEPA Process - Response to Comments
01082011-05-2	Page 264 of the DEIS shows that the Forest Service failed to outreach to environmental groups. This is discrimination and does not meet NEPA standards.	As described on pages 6–7 under “Public Scoping” and “Comments” conservation (environmental) groups were contacted. Comments were received during scoping from organizations such as Center for Biological Diversity, Upper Gila Watershed Alliance, and New Mexico Wilderness Society and were included in the DEIS mailing. The list in the DEIS page 264 is not an all-inclusive list. Over 16,000 emails and letters commenting on the proposed action were received during the scoping process. Due to the large number of commenters, the list was limited to just display the Federal, State, and local governments. Names of individuals, organizations, and agencies that were provided a copy of the DEIS are included in the project record.
01082011-07-9 01182011-02-2 01242011-01-1 01292011-01-1 01292011-09-3 02042011-02-1 02102011-04-1 02212011-03-7 02232011-04-6 02252011-02-1 02262011-03-1 03012011-01-1 03052011-21-1 03052011-32-1 03062011-06-1 03062011-32-1 03062011-51-1/2 03072011-35-1 03072011-48-1 03072011-52-1 03072011-126-3 03072011-152-2 03072011-185-1	‘Thank you’ or comment of general support for the Gila National Forest’s Travel Management project.	Thank you for participating and your comment of support for this project.

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03072011-231-1		

Letter/ Comment #	Summary Statement	NEPA Process - Response to Comments
01142011-04-1/9 01182011-03-1 01202011-02-1 01242011-02-1 01242011-04-1 01262011-03-1 01292011-18-1 02072011-06-27 02222011-01-5 02222011-02-5 03012011-02-1 03022011-15-2 03032011-15-4 03032011-17-1 03042011-07-1 03042011-13-1 03042011-48-2 03052011-18-1 03062011-31-1 03062011-34-10 03062011-50-1 03072011-18-1 03072011-21-156 03072011-25-2 03072011-34-1 03072011-37-1 03072011-47-4 03072011-53-1 03072011-56-5 03072011-65-1 03072011-69-1 03072011-81-1 03072011-95-4 03072011-116-1 03072011-121-1 03072011-152-4	Appreciate the opportunity to comment on the DEIS.	Thank you for participating and commenting on the Gila National Forest's Travel Management project and public involvement process.

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03072011-163-3 03032011-12-5 03052011-20-1 03062011-04-19 03062011-33-3		
03012011-05-1 03072011-42-2 03072011-89-6	The public comment period was too short and not sufficiently announced.	A minimum 45 days is the normal comment period for a draft EIS. The Forest Supervisor decided to extend the time period to be 60 days. The notice of availability was published in the Federal Register on January 7, 2009, and closed on March 7, 2009. Also legal notices were placed in the *Silver City Daily Press* and *The Herald* (Truth or Consequences, NM), the forest's newspapers of record. The forest posted advertisements in 10 newspapers in and around the forest and prepared flyers announcing the release of the DEIS and open house opportunities. Flyers were posted at more than 50 public locations such as post offices, community centers, stores, etc. Also, flyers with locations where the DEIS was available for review (i.e., community centers, stores, offices) were posted.
03062011-07-20 03072011-86-8	The demand by the forest service that comments regarding the Travel Management Plan "should be site specific" undermines the general principle that we hold that the access roads should remain open.	Comments are the most important contribution from the public. Comments should be clear, concise, and relevant to the analysis of the project. Comments that are solution oriented and provide specific examples will be more effective than general comments in assisting in adjusting or improving the proposed actions, analysis, and decision-making process. The DEIS open house handouts (January 2011) on "How do I make comments on the DEIS that are constructive and helpful to the Forest Supervisor" does include that a helpful comment should provide specific information on the motorized routes or areas. But also includes that a helpful comment should "describe why a particular alternative or element would or would not work" and "…information about how you use the forest and how particular proposals in the DEIS would affect that use."
03072011-18-21	Are all public voices fairly heard in this DEIS? Environmental and Tribal concerns do not figure prominently in the document. I recommend summarizing the results of public meetings and comments quantitatively to determine	Tribal consultation is outlined in the DEIS on pages 6 through 7 and tribal cultural and traditional practices is assessed on pages 258 through 259. As described on pages 6 through 7 under "Public Scoping" and "Comments," conservation (environmental) groups were contacted. Comments were received during scoping from organizations such as Center for Biological Diversity, Upper Gila Watershed Alliance, and New Mexico Wilderness Society and were included in the DEIS mailing. The list in the DEIS page 264 is not an all-inclusive list. Over 16,000 emails and letters commenting on the proposed

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	whether and how all constituencies were represented.	action were received during the scoping process. Due to the large number of commenters, the list was limited to just display the Federal, State, and local governments. Names of individuals, organizations, and agencies that were provided a copy of the DEIS are included in the project record.
03072011-151-1	Individual "Specialist Reports" were not made reasonably accessible, either on the CD or on the webpage, and therefore do not disclose to the public the full analysis. This lack of disclosure prevents full evaluation and knowledge of the analysis and therefore prevents an educated discussion of effects and informed decisions.	Specialist reports were available on the forest web page and were available upon request.
03042011-02-1 03072011-72-1	The Forest Service failed to outreach to all Forest users, especially permit holders for firewood. Public not informed of a new mandate.	Public involvement in Gila National Forest travel management is discussed on DEIS pages 6-7 under "Public Scoping." Prior to scoping the proposed action 46 public meetings and open houses were held. In the fall of 2008, another 18 workshops were held. The forest supervisor published the proposed action in September 2009 and followed up with 10 open houses and we mailed the proposed action to approximately 4,000 people and we received almost 16,000 letters and emails. The Forest Service also placed flyers at key community locations; published news releases; and placed advertisements with meeting notifications. Information on the Travel Management Rule and Forest process was presented at county commissioners meetings.
01082011-05-3 03072011-37-8	The Forest Supervisor should follow the letter and the intent of law and best available science when formulating the record of decision. The references are 20-60 years old, therefore the information is out of date for sound planning and analysis.	The regulation for implementing NEPA direct agencies to "insure the professional integrity, including scientific integrity, of the discussions and analyses in the environmental impact statements" (40 CFR 1502.24). Each specialist has cited the relevant studies and best available science in their specialist report.

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02072011-06-11 03012011-05-2 03052011-37-2 03052011-38-2 03062011-07-9 03062011-31-9 03072011-16-2 03072011-([16-001] to [16-662])-2 03072011-69-15 03072011-86-7 03072011-(0236 to 0255)-2 03072011-(0276 to 0373)-2	There is lack of data regarding traffic data and puts the DEIS in a poor position.	Where data sources did not clearly indicate that they were missing or incomplete in the DEIS, will be clarified in the FEIS and specialist reports per 40 CFR 1502.22 – "Incomplete or unavailable information." The forest doesn't have complete information on the condition and level of use of its forest system roads and trails, unauthorized routes, or motorized cross-country use. Collecting that information over the entire forest system routes, an unknown amount of unauthorized routes, and the entire National Forest System lands would be exorbitant and time consuming. Having complete information on the condition and motorized use of every mile and acre is not relevant to effectively analyzing the reasonably foreseeable significant adverse impacts on the human environment. The general effects of the existence and use of routes and off-road travel on natural and cultural resources are well documented and presented in each section of chapter 3.
03022011-15-5/18 03072011-78-92/109a 03072011-96-3	Analysis of the alternatives was not site-specific. Roads that were proposed closed were not specifically identified nor a rational provided for purpose of closure.	The National Environmental Policy Act does not require perfect or complete information to make a decision. The regulations at 40 CFR 1502.22(b) tell agencies what to do when the overall costs of obtaining the information are exorbitant (as would be the case with site-specific analysis of the roads, trails, routes, corridors, and areas on the forest). The Travel Management Rule does not require agencies to have a complete inventory of routes before completing the designation process (70 FR 68268, 68269). Many roads were visited on each district as part of the Priority 1 and 2 coarse filter inventory and stream crossing surveys. During development of the proposed action (using the criteria described in Gila's Process Presentation) and the alternatives (using the alternative framework) an interdisciplinary team consisting of district rangers, resource specialists, and other field-going personnel systematically reviewed each road, trail, corridor, and area one by one using the Forest GIS route information, natural and cultural resource information, other available land management information, and imagery. The motorized system presented in the proposed action and subsequently, each of the alternatives were developed using surveys, comments, GIS information, and Forest staff knowledge, and guided by the Gila's Process document and alternative framework. Although, for the most part, the analysis was a forestwide assessment; there were also areas, management areas, habitat, etc., where subsets of routes, corridors, or areas were assessed specifically depending on the resource area. Description of analysis of the proposals can be found chapter 3 of the DEIS and each specialist report.
03022011-15-15	The agency must disclose to the decision maker and the public all of the specific previous decisions it is incorporating into the DEIS and what routes are affected	Nothing in the TMR requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails or in areas on NFS lands and that were made under other authorities, including decisions made in land management plans and travel plans (Federal Register Vol. 70, No. 216, page 68268). The responsible official may, with public notice, but no further analysis or decisionmaking, establish that decision or those decisions as the designation pursuant to the TMR for the

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	(designated) by those previous decisions. Furthermore, if those 'previous decisions' were not made under a NEPA process, the prior decisions cannot be incorporated into ('tiered to') the DEIS. All of the routes affected by such decisions must be fully analyzed in this DEIS.	National Forest or Ranger District, effective upon publication of a motor vehicle use map. (Federal Register Vol. 70, No. 216, page 68268).
03022011-15-36	Disclose the planning rule that the proposed action is based on.	This project is tiered to the Gila National Forest Land and Resource Management Record of Decision and Plan as amended (1986). Forest plan amendments needed to bring the forest plan up to date to comply with the Travel Management Rule and proposal are listed in the DEIS on pages 17-18.
03022011-32-1d 03072011-21-86	The Gila National Forest is required to take a hard look at the environmental consequences, i.e., the direct, indirect, and cumulative effects.	The DEIS for Travel Management on the Gila National Forest, chapter 3, documents the required hard look at environmental consequences. The analysis in chapter 3 includes the direct, indirect, and cumulative effects of the proposed project and the literature cited is listed in the DEIS reference section.
01152011-53-1	The rivers are not displayed on alternative maps page 18.	Thank you for your comment. We will correct the river/stream layer issue for the FEIS maps.
03042011-11-2/6 03022011-15-31	The maps issued with the DEIS do not provide sufficient detail or accuracy. The DEIS did not include a listing of all routes with designations.	Route designation tables were available upon request. Unfortunately, it appears from comments that not all requests were correctly routed, and therefore, not fulfilled. We will make all attempts to rectify this issue for the FEIS.
03062011-25-6	Difficulty downloading maps from the web to review alternatives.	Hard copy maps and electronic copies on CD were available upon request at all Gila National Forest Offices.
03042011-55-7	In 2005-2007, the agency sought the help of the motorized community in identifying the unauthorized routes in use. The motorized community submitted detailed	Page 6 of the DEIS discusses public involvement prior to scoping and states that "information from all of the public involvement meetings and comments were used to develop the proposed action." Public comments received during this period of time are located within the project record.

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	information in the form of GPS data. The DEIS never even mentions that this data was solicited and received from the public. There is no excuse for the agency's failure to acknowledge that it has the data and no excuse or its failure to work with it.	
03062011-06-7a/9/12 03072011-18-16 03072011-21-35/37-41/43/46/47	Travel Management NEPA should include a decommissioning plan or should include decommissioning as part of an alternative and analyzed.	As noted on page 8 of the DEIS, decommissioning or the rehabilitation of closed roads is outside the scope of this analysis. Decommissioning of routes will be considered in the future. These will be considered on a case-by-case basis with appropriate NEPA process, including public involvement, and analysis.
03072011-121-3	Social and economic analysis ignores the unique aspects of the Forest. Not all road miles should be treated equally.	The forest doesn't have complete information on the condition and level of use of its forest system roads and trails, unauthorized routes, or motorized cross-country use. Collecting that information over the entire forest system routes, an unknown amount of unauthorized routes, and the entire National Forest System lands would be exorbitant and time consuming. The forest acknowledges that individuals have different values for the roads, trails, or unauthorized routes that they use. Those values could range from such things as destination, visuals, solitude, or other use opportunities. For a road, the value by individuals may vary and it would be difficult for the forest to collect that information for the entire forest and appropriately apply a measure for analysis. The general effects of the existence and use of routes and off-road travel are documented and presented in the social and economic section of chapter 3.
03072011-21-34	Request for revision of the purpose and need to more accurately reflect the intent of the Travel Management Rule and purpose of travel planning.	Many of the listed issues pertain to criteria that were considered in the designation of roads, trails and areas (36 CFR Part 212.55) and are incorporated in the alternatives. DEIS Table 15 provides a comparison of key elements for each alternatives. Additional discussion regarding these issues can be found in DEIS chapter 3, including cultural and social resources, social resources, and economics.
03072011-21-5	The environmental impacts analysis and protective measurement standards and guidelines should be predicated on the physical footprint of a particular route regardless of the bureaucratic	DEIS Table 17, page 43, provides the average width of roads based on its maintenance level and trails, including unauthorized routes (full-size vehicles and ATV trails). These widths were used for analysis purposes within the DEIS.

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	classification of that route.	
03072011-21-83	Motorized recreational use is not within the purpose and need.	Although the needs of motorized recreational uses are not stated specifically in the purpose and need, the alternatives incorporate motorized recreational opportunities within its alternatives.
03072011-78-21/22/26	The agency has failed to address long-term productivity, because that when motor access is reduced, the forest is less productive, and it cannot comply with many of the specific requirements set forth in the NFMA. Fewer roads will reduce the production of all goods and services intended for human use.	Production of good and services for human use is not jeopardized as stated on page 259 of the DEIS by proposed changes to the roads and trails on the forest. The Forest Service acknowledges that motor vehicles serve a variety of functions on National Forest System lands including commercial and natural resource management such as vegetation, fuels, timber, mining, and maintaining utility corridors and electronic sites. As part of planning for future timber harvest, fuels treatments, or other purposes or potential new special use projects (e.g., mining), motor vehicle access needs would be reviewed in relation to the objectives of the project and assessed in site-specific environmental analyses.
03072011-78-3	The DEIS disregards the National Environmental Policy Act (NEPA) and 40CFR § 1500.6. The NEPA requires that agencies make their NEPA-compliant decisions within the framework of each agency's Congressionally-delegated authority.	The Gila National Forest analysis of travel management DEIS was prepared following direction in Forest Service Handbook 1509.15. Forest Service Handbook 1509.15 provides guidance for implementing the National Environmental Policy Act, CEQ regulations, USDA NEPA policies and procedures, and Forest Service NEPA procedures.

Recreation

Motorized Routes and Uses

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02072011-03-2 02132011-01-6 03062011-41-2 03072011-115-1a	Concern that proposed changes are taking away motorized recreation experiences versus enhancing those opportunities.	See response to letter number 02282011-04 comment number 3. The Travel Management Rule (TMR) states that the clear identification of roads, trails, and areas for motor vehicle use on each national forest will enhance management of NFS lands; sustain natural resource values through more effective management of motor vehicle use; enhance opportunities for motorized recreation experiences on NFS lands; address needs for access to NFS lands; and preserve areas of opportunity on each national forest for nonmotorized travel and experiences.
02212011-01-4	Suggestion for converting closed roads into motorized trails for vehicles less than 50 inches.	This suggestion was considered in the proposed action and in appropriate action alternatives. See DEIS table 8 page 26 which shows changes to motorized trails. Alternatives C, D, F, and G propose adding various mileages of unauthorized routes, Management Level 1 (ML-1) (closed) and decommissioned roads, and open roads to be designated for motorized vehicles less than 50 inches.
02282011-04-3	Concerned with the proposal of reducing the number of roads on the Forests not being able to meet the projected increased future demand by the public for vehicle use.	The objective of the plan is to comply with the Travel Management Rule (TMR). 36 CFR 212.51(a) requires every national forest and national grassland to designate a system of National Forest System (NFS) roads, NFS trails, and areas on NFS lands for motor vehicle use. 36 CFR 212. 55(a) specifies general criteria for designation of NFS roads, NFS trails, and areas on NFS lands for motor vehicle use. Although not all-inclusive, these include such things as effects on natural and cultural resources, public safety, provision of recreational opportunities, access needs, and conflicts among uses. 36 CFR 212.55(b) states specific criteria for designation of trails and areas. Some of these include damage to soil, watershed, vegetation, and other forest resources; harassment and significant disruption of wildlife habitats; conflicts between motor vehicle use and existing or proposed recreational uses; and conflicts among different classes of motor vehicle uses. 36 CFR 212.55(c) states specific criteria for designation of roads. The final rule recognizes that designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen environmental impacts, changes in public demand, route construction, and monitoring conducted under §212.57 of the final rule may lead responsible officials to consider revising designations under §212.54 of the final rule. (USDA Forest Service 2005, Travel Management Final Rule)

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03042011-17-4 03062011-49-1a 03072011-104-1a	Request reasons for proposal to close roads to motorized uses.	The Travel Analysis Process (TAP) (May 2010) provided a framework and the explanation of the Forest Process in which route designations. Also, the forest presented the Forest Process and criteria that were going to be considered in the designation process during public meeting opportunities in 2006 and 2008. The presentation was also provided on the Forest Travel Management Website. During development of alternatives, an “alternative framework” was developed based on the significant issues identified during the public comment period which laid out the criteria used for designations for each of the alternatives.
03042011-20-4	Road closures could have the effect of limiting access to suitable drop-off/pick-up points and greatly increase the distance to points of interest.	Yes, depending on the alternative, access to favorite spots may be impacted and additional distance to access by nonmotorized means increased. For the most part, motorized access to trails and trailheads has been maintained.
03042011-55-1 03072011-120-2 03072011-153-3	ORVs are a viable part of our travel needs and should be provided for. ORV trails should be in selected areas of low sensitivity and non-key habitat areas.	See Draft Environmental Impact Statement (DEIS) table 8, Changes to motorized trails in miles, on page 26 and table 15, Comparison of Alternatives. The range of proposed motorized trail opportunities ranges from 0 miles in alternative E to 204 miles in alternative C.
03062011-11-1a	Concern that motorized trails (ATV) are limited to only 50 inches in width.	Forest Service guidance allows for the designation of three standard types of motorized trails: those that are open to all vehicles (including ATVs greater than 50 inches wide), those open to vehicles less than or equal to 50 inches wide, and those open only to motorcycles.
03072011-89-3	Request for explanation of unsupervised Recreation.	On November 9, 2005, the Forest Service published the final Travel Management Rule (TMR) for the use of motor vehicles on National Forest System lands. The TMR does not speak to “unsupervised recreational use.” Forest Service Chief Dale Bosworth identified four threats to keeping America’s forests and grasslands healthy. One of those four threats, “unmanaged recreation,” centered on managing impacts of motorized recreation vehicles by restricting their use to designated roads and trails.

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03022011-15-14 03022011-15-26 03072011-120-10	The agency does not disclose the cumulative impacts of this action on Recreation, specifically the human environment of motorized recreation	The final environmental impact statement (FEIS) updates the cumulative effects analysis for the project. The analysis includes past, present, and reasonably foreseeable actions relating to each of the issues and related indicators and discussion of the range of motorized and nonmotorized road and trail opportunities provided by alternative. The FEIS also includes an evaluation of effects to roadless characteristics on inventoried roadless areas (IRAs) and qualities of wilderness character on wilderness study areas (WSAs).
03022011-15-30	The agency fails to disclose specific user and use data in the Environmental Consequences section of the DEIS.	User conflict is not considered as an issue or separate indicator for the analysis. This topic will be removed from table 16 summary of effects in chapter 2 of the FEIS. The FEIS clarifies how user conflicts were considered under the Issue of Motorized Use as directed by the Travel Management Rule. The FEIS will be updated with indicators that allow comparison of effects of each of the alternatives and cumulative effects analysis. The FEIS will also update the recreation analysis with data from the 2011 National Visitor Use Monitoring Report (NVUM), Recreation Facility Analysis Forest Niche description and Forest Plan Recreation Opportunity Spectrum (ROS) data from the Gila National Forest Plan. An analysis of qualities of wilderness character within Wilderness Study Areas (WSAs) will be added. Solitude is one of these qualities and is defined and evaluated for the Hells Hole and San Francisco WSAs.
03022011-15-16 03072011-78-103	The ½-mile buffer in the recreation section is not appropriate for the analysis and is not backed by citations or science.	We agree that the ½-mile buffer is not the appropriate analysis tool for the recreation section. The alternatives considered and analyzed in the DEIS do not include travel buffer zones in areas surrounding wilderness. However, the DEIS includes analysis on the effects and impacts of travel in the area adjacent to wilderness. The analysis will be updated in the FEIS.
01072011-02-1 01072011-04-1 01072011-05-1 01072011-08-2 01072011-10-1 01072011-11-1 01072011-18-1 01072011-20-1/2 01072011-21-2 01072011-22-2	Support restricting motorized travel to designated routes and prohibiting cross-country travel. Protect the Gila National Forest. The Gila National Forest has been impacted by off-road vehicles and miles of undesignated roads been established	36 CFR 212.51(a) requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. Once the designations are made, motor vehicle use off designated roads and trails and outside designated areas (i.e., unregulated motorized cross-country travel) will be prohibited by 36 CFR 261.13 under all action alternatives, C through G. Corridors of varying widths for the purpose of motorized access for dispersed camping and big game retrieval are proposed under alternatives C, D, F, and G. Corridors are “solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51(b)). Proposed MBGR corridors would not be open to other motorized uses except where they overlap motorized dispersed camping corridors.

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01082011-02-1 01082011-04-2 01092011-01-1 01092011-03-1 01112011-02-2 01112011-04-2 01122011-01-2 01132011-01-1 01132011-08-3 01152011-02-3 01172011-02-2 02112011-04-2 02252011-03-1 03022011-02-1 03022011-03-1 03042011-10-1 03042011-34-2 03052011-10-1 03062011-04-25 03062011-22-1 03062011-35-3 03072011-10-2 03072011-25-3 03072011-35-2 03072011-53-12 03072011-56-3 03072011-98-4 03072011-108-1 03072011-129-1 03072011-140-3 03072011-146-1 03072011-157-1 03072011-158-1 03072011-161-1 03072011-171-1 03072011-203-1		Alternatives C, F, and G propose 38 areas consisting of 28 acres where cross-country travel will be allowed. One area is located on the Reserve Ranger District and will be open to ATVs and motorcycles, the remaining proposed areas have been traditionally used for motorized access for dispersed camping and it is assumed that this use will continue.

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03072011-209-1 03072011-222-1 03072011-225-1		
02282011-01-3	Request for clarification on current policy for motorized use on the Gila National Forest and proposed road closures and amounts in the DEIS.	Currently, motor vehicles may travel on a little over 4,600 miles of road and almost 16 miles of motorized trails as described under alternative B in the DEIS. In addition, motor vehicles may travel cross-country except in the three designated wilderness areas and within certain management areas where specifically closed.
02072011-06-16 03052011-23-4 03062011-24-4 03072011-21-82	Unauthorized routes, currently closed, decommissioned should not be open to motorized uses. This only encourages the irresponsible behavior that created these routes.	The Travel Management Rule (TMR) recognizes unauthorized routes in 36 CFR 212.1., and allows for the designation of unauthorized routes as open subject to evaluation at the local level. However, once the designation is made as to which roads, trails and areas are designated as open to motor vehicle travel all cross-country motor vehicle travel will be prohibited. “Unauthorized” or “User-created” routes were developed without agency authorization and do not have the same status as National Forest System roads and trails included in the forest transportation system. Many of these routes were developed because motor vehicles may currently travel anywhere on the forest, i.e., most of the forest is open to cross-country travel with a motorized vehicle, with the exception of designated wilderness areas and other areas closed by specific order. Some user-created routes may be well-sited, provide excellent opportunities for outdoor recreation, and enhance the system of designated routes. Other user-created routes are poorly located and cause unacceptable environmental impacts. The DEIS evaluated the impacts of adding a varying number of miles of unauthorized routes as roads or motorized trails to the forest transportation system. See Table 5 on page 24 and Table 8 on page 26 of the DEIS. Alternatives C, D, and F propose adding various mileages of unauthorized routes to the motorized trail system on the forest. Alternative G (the preferred alternative) proposes to add 51 miles of unauthorized routes and designate these as NFS trails open to motorized vehicles less than 50 inches in width. Alternative G also proposes to add 6 miles of unauthorized routes and designate these as NFS roads open to all vehicle types. Table 5 on page 24 of the DEIS displays the miles of Maintenance Level 1 (ML-1) closed or decommissioned roads proposed to be open under each of the five action alternatives. One mile of road would be reopened under alternatives D, E, F, and G. Four miles would be reopened under alternative C. These routes are considered necessary for future management and or public access need, and meet the criteria used to develop the alternatives. The direct, indirect, and cumulative effects of adding these routes are discussed in chapter 3 of the DEIS.

Letter/ Comment #	Summary Statement	Recreation, Motorized Routes and Uses - Response to Comments
03032011-02-1	All User Created Routes should be considered for inclusion as open for both hikers (non-motor vehicle uses) and motor vehicle use.	36 CFR 212.51a requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. These designated routes, as directed by the Travel Management Rule (TMR) are those that meet a need for future management or public access as identified through this environmental analysis process. Designation of routes for hikers or other non-motor vehicle activities is outside the scope of Travel Management designation process.
03042011-55-8 03072011-21-49a	There should have been at least one alternative analyzed that did not include unauthorized routes.	The Travel Management Rule (TMR) states that "User-created roads and trails may be identified through public involvement and considered in the designation process." 212.55 of the TMR directs the responsible official "to consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration. "
03052011-35-3	The mapping of user-created roads is incomplete. All existing roads should be considered in this process.	The TMR states that a complete inventory of unauthorized routes would be very time consuming and expensive delaying completion of route designation. The TMR does not require a complete inventory of all user-created routes in order to complete the designation process.
03062011-27-4 03072011-120-5 03072011-78-111/112	Concern with the term and use of "unauthorized route" in the DEIS.	The term "unauthorized" routes is defined in 36 CFR 212.1: Unauthorized roads or trails are defined as "a road or trail that is not a National Forest System road or trail, or a temporary road or trail and that is not included in a forest transportation atlas." With the forest being open to cross-country travel, these routes are not illegal, but they are not part of the national forest motorized road or trail system.
03062011-39-8 03072011-57-3	Unauthorized routes should be closed and restored to nature, so their impacts will not continue to degrade wildlife habitat.	Thank you for your comment. Closure or restoration of unauthorized routes not designated for motorized use under Travel Management is outside the scope of this project.
01152011-16-2 03062011-04-14	Motorcycle use should NOT be authorized on single-track trails designed and maintained for	Alternatives B, D, E, F, and G do not designate any motorized trails for single-track motorized use. Alternative C designated 64 miles. Motorcycle and ATV use would be allowed on motorized trails designated for vehicles less than 50 inches within the following alternatives: alternative B, 16 miles;

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	hikers and saddle stock.	alternative C, 204 miles; alternative D, 125 miles; alternative E, 0 miles; and alternatives F and G, 182 miles.
03072011-126-3 03072011-140-1	Designation of motorized trails for ATVs and single-track motorcycle use is very appropriate and timely given the huge growth of this form of motorized recreation. MVUM compliance would be enhanced if there were better trail opportunities for ATVs and dirt bikes.	There are currently only 16 miles of National Forest System designated ATV trail on the forest. Alternative C designated 64 miles of single-track motorcycle trail. Alternatives D, F, and G do not designate specific motorized single-track trails, however, they do propose designated routes for motorized trails less than 50 inches which are available for both motorcycle and ATV use. Total miles of motorized trails designated for vehicles less than 50 inches in width are: 204 miles in alternative C; 125 miles in alternative D; 0 miles in alternative E; and 182 miles in alternatives F and G. Table 8 on page 26 of the DEIS provides more specific details on proposed designated routes for motorized trails, less than 50 inches.

Nonmotorized Uses

Letter/ Comment #	Summary Statement	Recreation, Nonmotorized Uses - Response to Comments
01072011-14-2 01072011-19-1 01142011-01-1 01262011-04-2 02102011-03-3 03072011-30-1 03072011-116-3 03072011-155-1 03072011-161-2 03072011-230-1	Protect the Gila for future generations. Protect it from off road vehicles.	Thank you for your comment. 36 CFR 212.51(a) requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. Once the designations have been made under 36 CFR 212.51, motor vehicle use off designated roads and trails and outside designated areas (i.e., motorized cross-country travel) will be prohibited (36 CFR 261.13). Currently, motor vehicles may travel on a little over 4,600 miles of road and almost 16 miles of motorized trails. In addition, motor vehicles may travel cross country except in wilderness areas and within certain management areas where specifically closed. Thus, approximately 2.4 million acres are open to cross-country travel by motor vehicles. The DEIS analyzes the no action alternative (alternative B) and five action alternatives for motor vehicle use. The preferred alternative (alternative G) designates 3,323 miles of road open to the public for motor vehicle use, and 182 miles of motorized trails open to vehicles less than 50 inches in width (a 24 percent reduction in motorized roads and trails). The total percent change in the miles of motorized roads and trails differs for the other four action alternatives. Table 1 on page v of the DEIS compares the resulting motorized system of each action alternative. Table 16, pages 33 through 41, summarizes the effects analysis for recreation, watershed, aquatic species, and wildlife found in chapter 3. In compliance with the Travel Management Rule, cross-country motor vehicle travel would not be permitted under any of the five action alternatives. Motor vehicle travel would only be allowed on designated open roads, trails, and areas after designations are made. Overall, opportunities for recreational activities that do not depend on a motor vehicle will increase.
01072011-25-9 01072011-29-9 01082011-08-9 01082011-09-9 01122011-06-9 01182011-09-1 01182011-10-9 01202011-01-1/3 01232011-04-1 02032011-01-1 02272011-02-1 02272011-03-1 02282011-09-1 03012011-01-1/2	Comments that the national forests should be very limited or closed to ORV use especially off-road use to protect forest natural resources.	Motor vehicles represent an integral part of the recreational experience for many national forest visitors. Motor vehicles are a legitimate and appropriate way for people to enjoy the national forest, in the right places and with proper management. The agency must strike a balance in managing all types of recreational activities (Federal Register, Vol. 70, No. 216, page 68265).

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03032011-08-1 03042011-53-1 03052011-02-1 03052011-09-1 03052011-28-1a 03062011-15-1 03062011-29-1 03062011-42-1 03062011-47-1 03072011-31-1 03072011-40-1 03072011-46-1 03072011-47-1 03072011-61-1 03072011-109-1 03072011-110-1 03072011-136-3 03072011-159-1 03072011-169-1 03072011-194-1 03072011-227-1 03072011-230-4		
01252011-02-4	Expand wilderness areas to limit motorized uses.	Changes or expansion of wilderness areas is outside the scope of this project.
01252011-02-5/6	Consider developing more developed campgrounds, campgrounds for horse groups and trailheads.	Thank you for your comment regarding developing more campgrounds for horse groups and trailheads. The development of campgrounds and trailheads is outside the scope of the DEIS.
01252011-02-6 01302011-02-4	The Forest Service should identify more campgrounds for horse groups and maintain nonmotorized roads with clearly identified trailheads for hiker and	The Travel Management Rule (TMR) is specific only to the designation of National Forest System (NFS) roads, NFS trails and areas on NFS lands where motor vehicle travel is allowed. The DEIS does not analyze maintaining closed roads as nonmotorized trails or development of trailheads on these routes. This is outside the scope of the DEIS. Any decision to maintain closed roads as nonmotorized trails would be made as a separate decision. The analysis does consider converting open and Management Level 1 (closed) roads to motorized trails.

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	horseback use.	Areas for dispersed camping that could accommodate horse groups were considered in the Travel Management process under alternatives C, F, and G (DEIS table 13, pages 28 through 29). The development of campgrounds for horse groups is outside the scope of this project. The Gila National Forest greatly appreciates the tremendous contribution the Back Country Horsemen make in the maintenance of forest trails.
01302011-02-2/4 02022011-01-2 03072011-30-1a	Wants documentation to specify that closed roads are open to hikers, mountain bikes and horsemen. Concerned that future administrators might choose to interpret the decision to ban all use.	The DEIS analyzes different alternatives to implement the Travel Management Rule (36 CFR Parts 212, 251, 261 and 295). The TMR is specific only to the designation of NFS roads, NFS trails and areas on NFS lands where motor vehicle travel is allowed. Roads, trails and areas not open to motor vehicle travel will be open to recreational uses where a motor vehicle is not required such as hikers, mountain biking, and horse users. The Gila National Forest forest supervisor will decide what changes will be made to the current motorized travel. The use and designation of nonmotorized activities is outside the scope of this project.
03072011-144-1	Balance the various needs and wishes of all groups.	See response to comment 01072011-14-2 above. The DEIS analyzes the no action alternative (alternative B) and five action alternatives for motor vehicle use. The action alternatives were developed from significant issues (DEIS page 9) in which one of the issues, motorized routes, included the public concerns of both increasing and decreasing motorized routes and those effects on forest resources and uses. Table 1 on page v of the DEIS compares the resulting motorized system of each action alternative. Refer to pages 13 through 31 for details of each alternative.
03072011-70-1	Does not believe that motor vehicle travel should continue indefinitely.	Thank you for your comment.

Noise and User Conflict

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01072011-27-9 01142011-03-1a 01152011-15-2 01292011-12-1 02012011-04-2 02102011-05-3 02262011-05-1 03032011-09-1a 03042011-13-3 03042011-30-1/6 03052011-26-1 03052011-28-1 03052011-30-1 03062011-10-1 03072011-70-3 03072011-74-3 03072011-114-2 03072011-148-1 03072011-184-2	It is vitally Important to have places of peace, and solitude for quiet recreation activities including hiking, fishing and camping.	36 CFR 212.51(a) Travel Management Rule (TMR) requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. Once the designations have been made under 36 CFR 212.51, motor vehicle use off designated roads and trails and outside designated areas (i.e., motorized cross-country travel) will be prohibited (36 CFR 261.13). TMR directs the Forest Service to ensure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. Motor vehicle use of the national forest is an appropriate use. National forests should provide access for both motorized and nonmotorized users in a manner that is environmentally sustainable over the long term. The national forest is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. The national forests cannot be managed primarily just for such things as natural resources, biological diversity, quiet recreation, and other nonmotorized activities. The forests are managed by law for multiple use. TMR does not prohibit the management of National Forest System (NFS) lands for multiple use as provided in the Multiple-use Sustained Yield Act of 1960 (MUSY). MUSY authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range, water, recreation, and wildlife on the national forests for multiple use and sustained yield of the products and services. There are 792,584 acres of designated wilderness areas within the Gila National Forest, which make up 23 percent of the total forest acreage. By law, the use of motor vehicles is not allowed. The three wilderness areas provide opportunities for primitive recreation and solitude. The DEIS analyzes five action alternatives for motor vehicle use in compliance with the TMR. Table 1 on page v of the DEIS compares the resulting motorized system of each action alternative. In compliance with the TMR, cross-country motor vehicle travel would not be permitted under any of the five action alternatives. Motor vehicle travel would only be allowed on designated open roads, trails and areas after designations are made. Alternative E proposes to designate the least amount of motorized road and trail miles, most resource protection, and emphasizes nonmotorized recreation. It also does not propose any exceptions to the prohibitions on cross-country travel for motorized dispersed camping or big game retrieval (DEIS page 21).

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03012011-09-1 03072011-78-80/81/83a/104	The agency has no statutory authorization for protecting or enhancing "quiet" recreation. The agency has no legal standard for what "quiet" recreation is, outside Wilderness.	Quiet recreation has been removed as an indicator in the FEIS analysis. Quiet recreation was an issue addressed by the public, and it was not identified as a significant issue; therefore it was not used to develop alternatives. Since the concept of quiet or solitude recreational opportunities was identified as an issue, the FEIS still evaluates the potential effects to users who want to experience these types of opportunities on the forest.
01072011-02-2 01292011-11-2 03052011-17-4 03052011-27-2 03062011-03-1 03072011-178-3 03072011-191-1 03072011-206-1	There are ample trails and roadways for ORV riders. Preference to close most trail routes to motorized traffic.	36 CFR 212.51(a) Travel Management Rule (TMR) requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. Once the designations have been made under 36 CFR 212.51, motor vehicle use off designated roads and trails and outside designated areas (i.e., motorized cross-country travel) will be prohibited (36 CFR 261.13). Currently, motor vehicles may travel on a little over 4,600 miles of road and almost 16 miles of motorized trails. In addition, motor vehicles may travel cross country except in wilderness areas and within certain management areas where specified closed. Areas specified closed within the Forest Plan include Tularosa Wetlands, Gila River Bird Management Area, Fort Bayard, Silver City Watershed, Funny Rocks Area, and San Francisco River from Mule Creek to the Arizona state line. Thus, approximately 2.4 million acres are open to cross-country travel by motor vehicles. The DEIS analyzes the no action alternative (alternative B) and five action alternatives for motor vehicle use. The total percent change in the miles of motorized roads and trails designated for motorized use differs for the five action alternatives. Table 1 on page v of the DEIS compares the resulting motorized system of each action alternative. Table 16, pages 33 through 41 in the DEIS, summarizes the effects of each alternative as described in chapter 3 of DEIS. In compliance with the TMR, cross-country motor vehicle travel would not be permitted under any of the five action alternatives. Motor vehicle travel would only be allowed on designated open roads, trails, and areas after designations are made. Proposed exceptions to the prohibition on cross-country travel within the various action alternatives (except E) include corridors for motorized access for dispersed camping (MDC) and for big game retrieval (MBGR).
01092011-05-9 01092011-06-9 01262011-01-1 01292011-07-1a 03022011-24-3 03042011-20-2 03052011-20-2	The noise of ATVs or tracks off of roads or trails greatly distracts from a positive backcountry hunting, horse riding or hiking experience.	In compliance with the TMR, cross-country motor vehicle travel would not be permitted under any of the five action alternatives. Motor vehicle travel would only be allowed on designated open roads, trails, and areas after designations are made. Proposed exceptions to the prohibition on cross-country travel within the various action alternatives (except E) include corridors for motorized access for dispersed camping (MDC) and for big game retrieval (MBGR). Alternative E proposes designation of the least miles of motorized routes and no corridor designations for motorized access for dispersed

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03062011-13-1 03072011-57-2 03072011-152-3 03072011-165-1a 03072011-178-3a		camping and big game retrieval. The MVUM will assist recreationists in planning excursions to better meet desired expectations of motorized and nonmotorized trail opportunities. The MVUM will display which roads, trails, and areas are open to motor vehicle use.
03022011-15-3/11/40 03032011-17-3 03072011-78-68/69/70/78	Summary of the effects described in detail in chapter 3 but there is no data or analysis on the subject of "noise and user conflict" in chapter 3 or the underlying specialist reports.	Noise and user conflicts are not considered as an issue or a separate indicator for this analysis. This topic will be revised in the FEIS and recreation report. The alternatives provide a range of motorized and nonmotorized road and trail opportunities outside of designated wilderness. The standards and guidelines within the Forest Plan FEIS identify acreages within inventoried roadless areas where semi-primitive recreation opportunities will be maintained. See Final Environmental Impact Statement Recreation Specialists Report Conflict is defined as disagreement or emotional tension resulting from incompatible needs or drives. When the expectation of what a user will experience in an area are aligned with what opportunity is provided, that user's satisfaction is increased and conflict between users is reduced. The TMR requires "local agency officials, working with the public to designate which roads, trails and areas are available for motor vehicle use. In designating roads, trails, and areas, local agency officials must consider the minimization of conflicts among users of NFS lands (212.55(a). The large majority of research on the social impact of off-highway vehicle (OHV) use shows that the impacts between motorized users and other recreationists (including other motorized users) are asymmetric: meaning that motorized users affect recreationists more than they are affected by other recreationists. This often leads to displacement of nonmotorized recreationists. There is no way to predict this displacement.
03072011-78-72/73/75/76	Objection to utilizing User Conflict as an indicator for the Travel Management Analysis.	The FEIS updates the analysis and removes noise and user conflict from table 16, comparison of alternatives, in chapter 2. Noise and user conflicts have been incorporated into the discussion of motorized routes.
03062011-27-1/2	People who do not want to be around motor vehicles have 792,584 acres of wilderness for their quiet recreation	There are 792,584 acres of designated wilderness in the Gila, Aldo Leopold, and Blue Range Wilderness areas. Consideration was given during alternative development for some of the nonmotorized trail system, outside of wilderness, to be maintained for nonmotorized activities. The alternatives provide a range of motorized and nonmotorized road and trail opportunities outside of designated wilderness. The standards and guidelines within the Forest Plan FEIS identify acreages within inventoried roadless areas where semi-primitive recreation opportunities will be maintained.

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03072011-21-112	Noise from motorized vehicles should be compared to the noise other recreational users of the forest make, such as hikers, fishermen, or horseback riders. To determine the impacts of ORVs to other forest users, the impact of the noise from the ORVs must be compared to the lack of noise (or quiet) expected by most forest visitors.	The action alternatives would change the motorized use in the forest. There is no requirement or need to compare and contrast the noise of engines to that of other forest users and their activities since this project would not change those.
03072011-21-114	Wildland CPR's BMPs provide an authoritative guide to guide the Forest in how to avoid use conflicts and to manage for quiet use. See § 5.2 (Justification for Use Conflicts BMPs).	Currently, motor vehicles may travel on a little over 4,600 miles of road and almost 16 miles of motorized trails. In addition, motor vehicles may travel cross country except in wilderness areas and in a few smaller areas where specifically closed. Thus, over 2.4 million acres are currently open to cross-country travel by motor vehicles. The DEIS analyzes the no action alternative (alternative B) and five action alternatives for managing motor vehicle use. The preferred alternative (alternative G) would designate 3,323 miles of road open to the public for motor vehicle use, and 182 miles of motorized trails open to vehicles less than 50 inches in width (a 28 percent reduction in motorized roads opportunities and an 89 percent increase in motorized trails opportunities). Under each action alternative there would be no cross-country motor vehicle travel on over 2.4 million acres and no motor vehicle travel within the Gila, Aldo Leopold, and Blue Range Wilderness Areas (792,584 acres). The BMPs cited recommend a number of practices to minimize conflicts between recreationists for which "natural quiet" is important and recreationists who prefer a motorized experience. Consideration of these BMPs and different users' preferences were among the many factors that went into the formulation of the five action alternatives and the effects analysis presented in chapter 3 of the DEIS. In addition, the document referenced by the commenter cites a number of implementation and monitoring BMPs. The implementation and monitoring BMPs and the practices identified in the Forest Service document "Route and Area Designation Implementation Guide "will be considered once designations are made.

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03072011-21-121	The Forest Service should consider pending legislation in New Mexico that could allow ORVs to be registered as street legal vehicles, allowing their use on many more classes of routes in the Gila National Forest, HB 135.	The legislation cited did not pass in the 2011 or 2012, and was not considered in the DEIS.

Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors

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01152011-04-1 01152011-16-3 01152011-47-2 01202011-02-10 03052011-05-1 03072011-21-152 03072011-188-3a 03072011-213-3/4	Opposes designation of motorized dispersed camping corridors or feels 300 feet on each side of the road is an excessive amount. A lesser amount like 100 feet would be adequate. Concern more routes may develop within the corridors. Supports alternative E proposal for no motorized dispersed camping.	Motor vehicle access within dispersed camping corridors would be limited to what is needed to provide direct ingress and egress to the campsite, with the campsite the base of activity. These corridors would not be open to unrestrained motor vehicle use, i.e., driving a motor vehicle outside the area which is needed to go to and from the campsite. The roads and areas where motorized dispersed camping could occur differ under each of the alternatives (see table 1 on page v of the DEIS and the alternative maps). Alternative E does not propose any corridors for motorized access for dispersed camping (MDC). Although alternative E does not have designated motorized dispersed camping corridors, it does not eliminate the ability to disperse camp along and away from roads. Page 16 of the DEIS describes parking and dispersed camping: *Dispersed camping, such as tent camping, may occur anywhere on the forest. Riding horses and hiking to access a campsite is allowed anywhere on the forest. Parking for this type of dispersed camping may occur along any designated open road. Parking would be limited to one vehicle length, including any towed trailer, from the side of the road. Parking should occur where it is safe to park, does not cause resource damage (e.g., ruts), or is not already restricted.*
01192011-02-5/11 01202011-03-7 01252011-02-2 02072011-03-5 02282011-04-4 03022011-32-24 03032011-06-4a 03042011-20-3 03072011-24-3 03072011-78-71/95/96 03072011-90-2/4 03072011-140-2 03072011-205-1 03072011-233-1	Forest Access should be less restrictive for camping opportunities. Corridors for motorized access for dispersed camping are unnecessary; some existing sites are not included; and camping will be forced to be within limited areas (concentrated use).	The TMR says that the responsible official may allow the “limited use of a motor vehicle within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping” (36 CFR 212.51 (b)). Thus, motorized dispersed camping corridors must be specifically designated if this activity is allowed beyond the distance of roadside parking. The TMR applies to where people can use their motor vehicles. A corridor for motorized access for dispersed camping (MDC) designates the distance where people can drive off of the roads some distance and set up a camp. The forest recognizes that motorized dispersed camping is primarily characterized as vehicles or vehicles with trailers driving off of roads some distance and setting up a camp where the vehicles are where the activities or makeup of the camp center upon. The forest also recognizes that the limit of 300 feet and not having designated corridors along some roads eliminates some of those opportunities or favorite spots. But camping opportunities are not limited to the designated MDC corridors. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked. The camp

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		or tent may be set up any distance from the vehicle. In designating corridors for motorized access for dispersed camping, every opportunity was taken to include areas and sites where and how people traditionally camp. However, there are areas where people currently camp where motorized dispersed camping would not be allowed. These areas were excluded for the following resources: cultural and historical resources, critical and important wildlife and fish habitat, riparian areas, soils, water, and vegetation.
01232011-03-1/2 03012011-03-1 03022011-11-2 03022011-26-2 03042011-13-4 03042011-30-10/11 03042011-31-1 03042011-34-1a 03042011-41-1 03042011-46-1 03052011-03-1 03052011-15-1 03052011-30-2 03062011-38-1 03072011-183-2 03072011-202-1 03072011-212-1	Preference or support for Alternative E with the addition or modification of some designated dispersed camping areas. Request designated camping areas in non-sensitive areas that can be monitored and maintained.	In alternative E, the inclusion of areas was not part of the framework for designations within the alternative. Under this alternative, roads open to motor vehicle use, can be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked. The camp or tent may be set up any distance from the vehicle.
01292011-15-1	Concern that riparian and stream channels may be harmed where 300-foot corridors for motorized dispersed camping (MDC) overlap riparian and stream habitat.	Corridors for MDC are “solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51(b)). The motorized use for dispersed camping will allow access to camp sites, not unmanaged cross-country travel within the corridor. Effects to riparian areas are discussed in the DEIS, chapter 3, pages 88 through 89.

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02110211-01-1 03072011-78-97	Dispersed camping should be available along highways and especially county roads.	Many of the county roads and highways have good surfaces and the potential for more traffic and higher speeds than most Forest Service roads, especially maintenance level 2 roads, and many county roads are within proximity to private lands. These were taken into consideration in the designation process. In alternatives C, D, F, and G, the Glenwood, Silver City, and Reserve Ranger Districts designated MDC corridors along county roads (DEIS table 9, page 26). County roads within the boundary of the Gila NF with NFS lands adjacent to them, which do not have a designated MDC corridor, can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked. The camp or tent may be set up any distance from the vehicle. The designation of corridors for motorized dispersed camping may be revised as needed to meet changing conditions (36 CFR §212.54).
02242011-04-2	Concern whether the Forest Service is prepared to provide for the security and safety as congestion increases at “terminal facilities” or alongside designated roads.	Outside the scope of this project. The forest did not propose any facilities associated with dispersed camping in the DEIS. Monitoring will be an important part of implementing the final travel management designations to ensure that the designations are accomplishing their intended purpose.
02272011-04-1 02282011-01-2	Concern with the intent and reduction of camping further than 300 feet from vehicle will not allow overnight or multi day hiking trips into the Forest due to being limited to camp by the vehicle.	This is an incorrect interpretation of the 300-foot corridor. The Travel Management Rule (TMR) applies to where people can use their motor vehicles. A corridor for motorized access for dispersed camping (MDC) designates the distance where people can drive off of the roads some distance and set up a camp. The forest recognizes that motorized dispersed camping is primarily characterized as vehicles or vehicles with trailers driving off of roads some distance and setting up a camp where activities or makeup of the camp center upon the vehicles. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. For both MDC corridors and parking, the location of the camp or tent site is not restricted to where the vehicle is located. The camp or tent site can be set up any distance from the vehicle for overnight or multi-day trips into the backcountry or wilderness areas.

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03032011-15-2 03062011-04-11	Supports the designation of motorized dispersed camping corridors proposed in alternative G.	Thank you for your comment. In addition to the designation of 1,327 miles of corridors for motorized access for dispersed camping, the other 1,996 miles of roads open to motor vehicle use can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked. The camp or tent may be set up any distance from the vehicle.
03042011-36-1	Under alternative G, I believe you have given yourself an impossible law enforcement task of motorized dispersed camping by not having enough miles in this category and I do think too many roads are closed, please open more roads for camping.	Our experience shows that compliance with new rules and regulations increases over time. The forest will publish annually a motor vehicle use map (MVUM) that will provide details as to which roads, trails, and areas are open for motor vehicle use. In designating corridors for motorized access for dispersed camping, every opportunity was taken to include areas and sites where people traditionally camp. However, there are areas where people currently camp where motorized dispersed camping would not be allowed. These areas were excluded to protect cultural and historical resources, critical and important wildlife and fish habitat, protect riparian areas, soils, water, and vegetation. The public is not limited to camping within the designated MDC corridors. In addition to the designation of 1,327 miles of corridors for motorized access for dispersed camping, the other 1,996 miles of roads open to motor vehicle use can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked. The camp or tent may be set up any distance from the vehicle.
03062011-20-1	Supports alternative E. Recommends that dispersed camping be allowed within one car length of roads.	Under alternative E, vehicles would be allowed to park one vehicle length, including any towed trailer, from the side of 2,332 miles of open roads. The camp or tent is not restricted to where the vehicle is parked; it can be set up any distance from the vehicle.
03072011-21-93/154 03072011-53-11	In the Wilderness district, we believe only in alternative G, there is a plan to designate open “areas” for dispersed camping, but it would be more appropriate to designate these popular camping locations as	Thank you for your recommendation. The creation or designation of camping “sites” is more related to recreation facilities planning and management and outside the scope of Travel Management. Designation of areas and corridors for motorized dispersed camping is allowed under Travel Management and may be revised as needed to meet changing conditions (36 CFR §212.54).

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	designated sites. Recommendation the adoption of a forest-wide policy of designated sites and when necessary designate short spurs or routes to these sites.	
03072011-63-2	If there is no off-road travel, then make the following exceptions. Allow camping off any road and a distance as far as 300 yards from the road.	In designating corridors for motorized access for dispersed camping every opportunity was taken to include areas and sites where people traditionally camp. The 300-foot distance is a commonly used distance by other forests and the Gila National Forest felt that the majority of motorized dispersed camping currently occurring would be included. However, there are areas where people camp that are excluded with a 300-foot distance where motorized dispersed camping would not be allowed. These areas were excluded to protect cultural and historical resources, critical and important wildlife and fish habitat, riparian areas, soils, water, and vegetation. The Travel Management Rule (TMR) applies to where people can use their motor vehicles. A corridor for motorized access for dispersed camping (MDC) designates the distance where people can drive off of the roads some distance and set up a camp. But camping is not limited to the MDC corridors. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked; it can be set up any distance from the vehicle. Activities such as camping, fishing, hunting, hiking, backpacking, mountain biking, wildlife viewing, and horseback riding any distance from the vehicle may still occur. The 3.3 million acres of the Gila National Forest will still be open for visitors to pursue their favorite recreational activity.
03072011-78-23	DEIS does not provide mitigation for loss of corridors if cultural resources require route or corridor closure. Cultural clearance does not require closure of existing routes; asserting such is abuse of agency authority.	The National Historic Preservation Act (NHPA) and R3 Heritage TM protocol require that adverse effects to cultural resources be considered and addressed, in order to reduce or eliminate these effects. Also, Travel Management, 36 CFR 212.55 b.1, requires that: (b) Specific criteria for designation of trails and areas. In addition to the criteria in paragraph (a) of this section, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (1) Damage to soil, watershed, vegetation, and other forest resources (36 CFR 212.55 b.1).

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		The TM Protocol lists certain TM designations that are exempt from cultural resource consultation due to low probability of causing further disturbance to resources. These exemptions include existing Forest System roads and trails, and their associated constructed features. However, this does not preclude the Forest Service from implementing protection measures where unacceptable impacts are occurring (USDA Forest Service, Southwestern Region; New Mexico State Historic Preservation Officer; Appendix I; 2007). When identified, adverse or potentially adverse effects will be mitigated as required by both the NHPA and the R3 Heritage TM Protocol. If adverse effects to a site are related to an existing route, it is well within the authority of the Gila National Forest to close that existing route. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked; it can be set up any distance from the vehicle. Activities such as camping, fishing, hunting, hiking, backpacking, mountain biking, wildlife viewing, and horseback riding any distance from the vehicle may still occur. The 3.3 million acres of the Gila National Forest will still be open for visitors to pursue their favorite recreational activity.
03072011-78-93	Cumulative effects of camping corridors are not analyzed. The DEIS severely understates the closure of dispersed camping and does not disclose the cumulative effects of the true degree of closure.	You are correct. The FEIS will update the cumulative effects analysis for the project regarding motorized dispersed camping.
03022011-32-22	Endorses alternative C with the one-mile corridor on both sides of a road for motorized big game retrieval. Endorses because of age and not as strong or mobile as once was.	Alternative C provides the greatest distance (1 mile) to travel to retrieve game species with a motorized vehicle. Alternative F provides ½ mile, alternatives D and G provide 300 feet using the same motorized dispersed camping corridors, and alternative E does not provide any corridors for big game retrieval. Alternative C also provides for the most variety of game species to be retrieved with motorized vehicles. Those species are elk, deer, bear, mountain lion, javalina, and pronghorn. Alternatives D and G limit MBGR to elk and deer, and alternative F to elk only.

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
03022011-32-22a	All but alternative C or any restriction on game retrieval would encourage road hunting. Feel there would be a decrease in permit sales for those who would be unable to retrieve game without assistance of motor vehicles.	Thank you for your comment. The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). New Mexico Department of Game and Fish (NMDGF) manages the hunting and regulations of big game species. The forest will work with NMDGF to monitor and evaluate the effects for whichever alternative the responsible official selects.
01072011-16-3 03072011-53-10 03072011-21-92a	Concern that allowing motorized big game retrieval corridors would result in more routes being developed.	Corridors for motorized access for big game retrieval (MBGR) are solely for the purpose of retrieving a downed big game animal by an individual who has legally taken that animal. These corridors would not be open to motor vehicle use for scouting or hunting. Motor vehicle use that is contrary to retrieving downed game, i.e., driving a motorized vehicle other than driving directly to retrieve the downed game and back, would be a violation. Monitoring will be an important part of implementing the final travel management designations to ensure that the designations are accomplishing their intended purpose.
01082011-06-5	Opposes hunting of any kind and opposes access for motorized big game retrieval. Motorized vehicles disrupt other forest users.	The DEIS analyzes a range of alternatives for motorized big game retrieval (MBGR), including no MBGR under alternative E. Motor vehicle use on the Gila National Forest is an appropriate use. The forest is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre.
01102011-06-4 03052011-35-7 03072011-63-3 03072011-233-2	Concern that MBGR restrictions under alternatives D, E, and G would create an increase in waste of game and shooting from the road. Neither of these is safe or ethical.	Thank you for your comment. The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). New Mexico Department of Game and Fish (NMDGF) manages the hunting and regulation of big game species. The forest will work with NMDGF to monitor and evaluate the effects for whichever alternative the responsible official selects.
01152011-01-2	MBGR should be allowed on	MBGR is allowed on both sides of the roads as stated on page 16 of the DEIS. This would apply to

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
	both sides of designated roads.	alternatives C, D, F, and G. There are areas within the national forest where motor vehicles would be prohibited and those are: National forest wilderness areas; national forest primitive areas; and restricted roads, trails, or areas specified in forest orders.
01152011-16-4 01152011-24-3 01152011-46-1 01262011-02-1 02142011-01-2 03022011-04-2 03032011-14-2 03062011-02-1 03062011-06-5 03062011-20-2 03062011-33-2 03072011-21-92 03072011-47-2 03072011-56-2 03072011-57-5 03072011-87-1/2 03072011-168-1 03072011-169-2 03072011-176-2 03072011-178-5 03072011-189-2 03072011-226-2 03072011-230-3	Does not support or opposes designation of corridors for motor vehicle access to retrieve big game. Feel that game can be packed out by foot, horse, family, friends, or by other means. Supports alternative E that has no corridors for big game retrieval. Provides protection of resources from off-road use.	Thank you for your comment. Alternative E does not propose to designate any corridors for motorized access for big game retrieval (MBGR). Comments varied on the ability to use motorized vehicles to retrieve game and, if allowed, the distance to travel. The DEIS alternatives propose to designate different distances from both sides of open roads for motorized access for big game retrieval (MBGR) (DEIS table 10). These distances range from no MBGR under alternative E, to 300 feet under alternatives D and G, to ½ mile under alternative F, and to 1 mile under alternative C. Motor vehicle use within MBGR corridors would be solely for the purpose of retrieving downed game. The corridors are not open areas to use a motor vehicle for hunting or scouting game. Chapter 3 summarizes the physical, biological, social, cultural, and historical environments of the project area and the effects of implementing each alternative on that environment.
01152011-55-2 03042011-36-2a	All but alternative C with 1-mile game retrieval corridor would encourage road hunting and wanton waste.	Thank you for your comment. The Travel Management Rule requires that we monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). New Mexico Department of Game and Fish (NMDGF) manages the hunting and regulation of big game species. The forest will work with NMDGF to monitor and evaluate the effects for whichever

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
		alternative is selected by the responsible official.
01182011-04-2	Does not agree with alternative G MBGR corridor. The Forest Service does not know where hunters will shoot their game and therefore Alternative B would be the best choice.	Under the Travel Management Rule, to consider the use of motor vehicles for the purpose of game retrieval, the responsible official must include in the designation the “limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51(b)). Alternative G is only one alternative. Alternative descriptions for all alternatives for motorized game retrieval are found on page 26, table 10 of the DEIS.
01192011-02-10 02272011-01-6 02282011-04-2 03022011-09-2 03042011-04-7a 03042011-05-1 03042011-06-1 03042011-22-1 03042011-49-2 03072011-145-6	Continued access should be allowed for legal hunters to retrieve game during hunting seasons and within the rules already established by the New Mexico Game and Fish Department in their big game regulations. Continuing access would: Not encourage road hunting Not result in an increase in wanton waste	Under the Travel Management Rule, to consider the use of motor vehicles for the purpose of game retrieval, the responsible official must include in the designation the “limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51(b)). The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). New Mexico Department of Game and Fish (NMDGF) manages the hunting and regulation of big game species. The forest will work with NMDGF to monitor and evaluate the effects for whichever alternative the responsible official selects.
01192011-02-3 02102011-01-1 03062011-49-7	The use of a motor vehicle, particularly ATVs, do little if any negligible damage particularly if a path is followed as a once in, once out. For multiple trips if needed for an elk pack-out, different paths taken each time would basically create no significant damage.	Thank you for your comment. The soils discussion on off-road travel on page 86 agrees with your statement regarding one-time trips with motor vehicles. Chapter 3 of the DEIS summarizes the physical, biological, social, cultural, and economic effects of motorized uses.

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01192011-02-48 02282011-04-2a	Feel the Forest Service is restricting big game retrieval in response to New Mexico Game and Fish's request.	The Forest Service did discuss with New Mexico Department of Game and Fish and received comments on motor vehicle use on the forest including motorized big game retrieval. The Department's letters dated December 21, 2006, and October 26, 2009, requested that motor vehicle use for game retrieval be consistent or treated equally to other motorized recreational uses under Travel Management. Alternative D and G are within the desires of New Mexico Department of Game and Fish. But other distances for game retrieval were considered in the DEIS and are described on page 26, table 10.
01292011-14-1 02032011-04-5 03072011-32-3 03072011-180-2	Supports alternative G. Further protects habitat and wildlife populations.	Thank you for your comment. Alternatives D and G propose corridors for MBGR within the same motorized dispersed camping corridors which are 300 feet on either side of designated roads.
02132011-01-5 02262011-02-2/4 02262011-04-2 03022011-32-16/32b	Support alternative B for motor vehicle use for big game retrieval. Feel the lack of being able to retrieve game will result in more waste of game and increase of road hunting. Hunters will be affected due to difficulty of retrieving game.	Under the Travel Management Rule, to consider the use of motor vehicles for the purpose of game retrieval, the responsible official must include in the designation the "limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal" (36 CFR 212.51(b)). The Travel Management Rule requires that the Forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). New Mexico Department of Game and Fish (NMDGF) manage the hunting and regulations of big game species. The forest will work with NMDGF to monitor and evaluate the effects for whichever alternative the responsible official selects.
03022011-10-1	Concern that the right to hunt on the forest would be taken away.	The ability to hunt on the national forest is outside the scope of Travel Management. Under travel management, the ability and over what distance from a designated road a motor vehicle can travel to assist in retrieving big game species is the only aspect of hunting that is under consideration.
03042011-04-7	Table 3 on page 17 in the Draft Environmental Impact Statement (DEIS) states that no motorized big game	The statement "No big game retrieval is allowed" in table 3 on page 17 of the DEIS refers only to the Fort Bayard 7C Management Area. The forest proposes to maintain the motor vehicle restrictions that are currently in place as specified within the Gila National Forest Plan for the Fort Bayard 7C area

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
	retrieval is allowed in all alternatives.	under all alternatives.
03042011-36-2	Any restrictions on motor vehicles to assist in big game retrieval would increase wanton waste and be in violation of State hunting regulations of transporting edible portions of the meat from the field (page 10 big game rules).	Under the Travel Management Rule, to consider the use of motor vehicles for the purpose of game retrieval, the responsible official must include in the designation the "limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal" (36 CFR 212.51(b)). The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). New Mexico Department of Game and Fish (NMDGF) manage the hunting and regulations of big game species. The forest will work with NMDGF to monitor and evaluate the effects for whichever alternative the responsible official selects.
03052011-35-8	All large game should have motorized retrieval, not just elk and deer hunters.	Alternative C proposes various large game species to be retrieved by motor vehicles. Alternatives D and G propose only elk and deer, and alternative F proposes elk.
03062011-04-3/6	Concern that the New Mexico Department of Game and Fish definition of established roads is inconsistent or differs from Forest Service designations. This conflicts with statement that "applicable" NMG&F regulations should be followed.	Although the New Mexico Department of Game and Fish hunting regulations provide a definition for established roads, its regulations for "Motor Vehicle on Public and Private Lands" states "It also is illegal to drive motor vehicles on all roads or areas closed to vehicular traffic under the Habitat Protection Act or other state or federal regulations… Obey all posted rules and know the regulations that apply for the land management agency(s) where you will be driving." After a decision is made on an alternative, the publication of the motor vehicle use map (MVUM) will trigger the prohibitions under 36 CFR 261 related to motor vehicle use on the forest. The MVUM will display designated motorized routes, roads, trails and designations for corridors for motorized access for dispersed camping and big game retrieval, if applicable. If the route is displayed on the MVUM, it is open to all public users including hunters. Motor vehicle use off the designated system displayed on the MVUM is prohibited and will be the regulation referred to in the New Mexico Department Game and Fish hunting regulations for motor vehicles on public lands.
03062011-04-9/12	Concern that alternative F with ½-mile corridor to allow	Corridors for motorized access for big game retrieval (MBGR) are solely for the purpose of retrieving a downed big game animal by an individual who has legally taken that animal. These corridors would

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
	for motorized big game retrieval corridors would result in more routes being developed.	not be open to motor vehicle use for scouting or hunting. Motor vehicle use that is contrary to retrieving downed game, i.e., driving a motorized vehicle other than driving directly to retrieve the downed game and back, would be a violation. Monitoring will be an important part of implementing the final travel management designations to ensure that the designations are accomplishing their intended purpose.
03072011-140-4 03072011-188-3	Supports motorized big game retrieval corridors being within 300 feet of any open road.	Alternatives D and G designated motorized big game retrieval corridors, extending 300 feet from each side of the road. Corridors are designated along specified roads, not all roads.
03072011-50-3	Alternative C should be changed to ½ mile since 1 mile is excessive. All distances are not backed by science and arbitrary.	Under the Travel Management Rule, to consider the use of motor vehicles for purpose of game retrieval, the responsible official must include in the designation the “limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate, within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal” (36 CFR 212.51(b)). NEPA requires an analysis of a range of reasonable alternatives, not every possible alternative. The six alternatives analyzed represent the many and varied comments received on MBGR and meet the requirement for the evaluation of a range of reasonable alternatives.
03072011-73-1/2 03072011-140-4	Motorized big game retrieval should be restricted to the 300-foot motorized dispersed camping corridor.	Thank you for your comment. Alternatives D and G propose corridors for MBGR within the same motorized dispersed camping corridors which are 300 feet on either side of designated roads.
01072011-01-3 01072011-25 to 96-3 01082011-07 to 64-3 01092011-05 to 23-3 01102011-09 to 23-3 01122011-04-4 01122011-06 to 19-3 01132011-15 to 23-3 01142011-04 to 09-3 01152011-05-1 01152011-16-3/4	Does not support a 600-foot game retrieval and camping corridor. People do not need to drive more than 100 feet to a campsite. More network of routes would be created and damage forest habitat.	Alternatives C, D, F, and G propose 300 feet from each side of roads be designated for motorized dispersed camping corridor. The corridor distance for motorized big game retrieval varies by alternative (C = 1 mile; F = ½ mile, E = 0 mile). In alternatives D and G, designated motorized dispersed camping and motorized big game retrieval corridors are the same—300 feet from each side of the road. Motor vehicle access within these corridors would be limited to what is needed to provide direct ingress and egress to either the campsite, with the campsite the base of activity, or to downed game. These corridors would not be open to unrestrained motor vehicle use, i.e., driving a motor vehicle outside the area needed to go to and from the site or game. Alternative E proposes no corridors for motorized access for dispersed camping (MDC) and

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
01162011-01 to 05-3 01172011-03-3 01172011-04-3 01182011-10-3 01182011-11-3 01202011-04-3 01202011-05-3 01252011-03-3 01262011-02-1/2 01262011-06-2 01282011-03-3 01292011-10-1/2 01312011-02-3 01312011-03-3 02022011-03-3 02032011-05-3 02032011-06-3 02042011-02-5 02112011-003-3 02112011-004-3 02142011-(002 to 016)-3 02152011-(003 to 006)-3 02162011-(007 to 013)-3 02172011-(002 to 004)-3 02202011-003-3 03052011-23-5 03062011-24-2 03062011-28-1 03062011-39-10 03072011-189-1/2 03072011-213-3/4 03072011-98-10 03072011-99-4	Supports alternative E.	motorized big game retrieval (MBGR). Although alternative E does not have designated motorized dispersed camping corridors, it does not eliminate the ability to disperse camp along and away from roads. Page 16 of the DEIS describes parking and dispersed camping: *Dispersed camping, such as tent camping, may occur anywhere on the forest. Riding horses and hiking to access a campsite is allowed anywhere on the forest. Parking for this type of dispersed camping may occur along any designated open road. Parking would be limited to one vehicle length, including any towed trailer, from the side of the road. Parking should occur where it is safe to park, does not cause resource damage (e.g., ruts), or is not already restricted.*
02042011-02-5	Strict limits should be set on dispersed camping and game	Alternatives C, D, F, and G propose 300 feet from each side of roads designated to have a motorized dispersed camping corridor. The corridor distance for motorized big game retrieval varies by

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
	retrieval. Vehicles need to stay on designated routes. Off-road use increases new route development.	alternative (C = 1 mile; F = ½ mile, E = 0 mile). In alternatives D and G, designated motorized dispersed camping and motorized big game retrieval corridors are the same—300 feet from each side of the road. Motor vehicle access within these corridors would be limited to what is needed to provide direct ingress and egress to either the campsite, with the campsite the base of activity, or to downed game. These corridors would not be open to unrestrained motor vehicle use, i.e., driving a motor vehicle outside is the area needed to go to and from the site or game. The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57).
02072011-06-10	Alternative G motorized dispersed camping and motorized big game retrieval corridor proposal will make enforcement impossible.	Outreach, education, signage, enforcement, and monitoring are some of the tools the forest will use to implement where people can drive their motor vehicles. In addition, the forest will provide a free motor vehicle use map that will show roads, trails, and areas open to motor vehicle travel. Monitoring will be an important part of implementing the final travel management designations to ensure that the designations are accomplishing their intended purpose. The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan as appropriate and feasible (36 CFR 212.57).
02072011-06-15 03072011-21-87/88/90	Gila's use of designated fixed-distance corridors undermines the purpose of the final TMR definition of "sparingly."	The Travel Management Rule (TMR) does not define "sparingly." The rule provides for the interpretation of sparingly to be made locally, based on local conditions present on the individual national forest or grassland on which the designations are to be made. As stated in the rule's background information, "designations of roads, trails, and areas for motor vehicle use should be made locally." The final rule provides a national framework for local decision making. The TMR retains flexibility at the local level to determine, with public involvement, appropriate motor vehicle use on National Forest System (NFS) roads, on NFS trails, and in areas on NFS lands. The TMR further states that the Department believes that decisions about specific routes, and areas are best made by local officials with knowledge of those routes and areas, the local environment, and site-specific tradeoffs, with public involvement and in coordination with appropriate Federal, State, local, and tribal governments. Chapter 3 - Assumptions and Limitations within the DEIS acknowledges that the entire 2.4 million acres of non-wilderness is not available for motor vehicle use and that slope, topography, and vegetation may limit motor vehicle use and access. Each alternative proposes fewer acres of corridors for motorized access for dispersed camping (MDC) and game retrieval (MBGR) than the current 2.4 million acres, and the amount of reduction varies from 0 in alternative E to 2.2 million acres in alternative C. The acres of corridors for MDC and MBGR proposed in alternatives D (85,921)

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
		and G (95,994) are considerably less than the approximate 2.4 million acres that are currently open to cross-country travel. The indirect, direct, and cumulative effects of MDC and MBGR corridors are analyzed in chapter 3 of the DEIS. The recreation analysis for MDC and MBGR will be updated.
03032011-04-1	The Department of Game and Fish supports an alternative that treats hunting-related ORV activities similar to any other recreational ORV activity.	Alternatives D and G propose designated motorized dispersed camping and motorized big game retrieval being the same corridors, extending 300 feet from each side of the road.
03072011-21-89	A site-specific analysis for areas and corridors should be conducted looking at the direct, indirect, and cumulative effects of these areas open to cross-country travel.	Chapter 3 of the DEIS includes effects of motorized corridors and areas.
03072011-21-89a	The proposal of corridors and areas that allow cross-country for dispersed camping and big game retrieval would need to be specifically consulted upon with SHPO.	The Forest Service will consult with SHPO on any proposed action that requires section 106 consultation and compliance under the Travel Management protocol.
03072011-25-4 03072011-221-2	Supports motorized dispersed camping and motorized big game retrieval corridors being the same.	Thank you for your comment. Alternatives D and G propose designated motorized dispersed camping and motorized big game retrieval being the same corridors, extending 300 feet from each side of the road.
03072011-56-4	Supports alternative D which allows some camping and game retrieval corridors and reduces road mileage	Thank you for your comment. Alternative D proposes designated motorized dispersed camping and motorized big game retrieval being the same corridors, extending 300 feet from each side of the road.

Letter/ Comment #	Summary Statement	Recreation, Motorized Dispersed Camping and Motorized Big Game Retrieval Corridors - Response to Comments
	compared to alternative E that has no corridors. Corridors could be reduced to 150 to 200 feet.	The Travel Management Rule requires that the forest monitor the effects of motor vehicle use on the designated system in accordance with the applicable land management plan, as appropriate and feasible (36 CFR 212.57). Should an alternative with 300-foot designated corridors be selected, effects of the designation would be monitored and adjusted if needed.

Areas

Letter/ Comment #	Summary Statement	Recreation, Areas - Response to Comments
03072011-21-155	The proposed 8-acre play area in the Reserve Ranger District should be evaluated for liability issues.	36CFR 212.51 (a) The Travel Management Rule (TMR) requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. The TMR dos not address liability. 36CFR 212.55 (a) and (b) as well as Forest Service Manual Direction 7715.5 (1) (b) and 7715.52(2) provide the following general and specific criteria for these designations. The responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System land, the need for maintenance and administration of roads, trails and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration. The responsible official shall also consider the following specific criteria with the objective of minimizing: Damage to soil, watershed, vegetation, and other forest resources; Harassment of wildlife and significant disruption of habitats; Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and Conflicts among different classes of motor vehicle uses of National Forest System lands of neighboring Federal lands. In addition, the responsible official shall consider: compatibility of motor vehicle use with existing condition in populated areas, taking into consideration sound emissions and other factors. The above criteria were considered in the selection of the proposal to designate the area in the Reserve Area. The proposed area is located within a previously disturbed area that currently receives substantial motorized use and will be delineated on the ground and on the motorized vehicle use map addressing the criteria of public safety and (education and information) and minimizing conflict between motor vehicle use and exiting recreation uses. The area is restricted to vehicles less than 50 inches which addresses conflicts between classes of motor vehicles.

Parking

Letter/ Comment #	Summary Statement	Recreation, Parking - Response to Comments
03032011-14-3	Allow vehicles off roads no more than a car length.	Parking is defined on page 16 of the DEIS. Parking would be limited to one vehicle length, including any towed trailer, from the side of any designated open road. This is the same for all action alternatives. The exception is within motorized dispersed camping corridors proposed under alternatives C, D, F, and G (DEIS pages 14 through 16). Motor vehicles may drive up to 300 feet off of each side of certain roads designated for motorized dispersed camping, and park with the campsite within the corridor.
03032011-15-3 03072011-58-4	We appreciate the fact that a vehicle length for parking includes a trailer attached to the vehicle. We would like to see some flexibility in enforcement of this distance.	Thank you for your comments. Concerns regarding flexibility in enforcement of exceeding the parking distance during the process of parking or turning around will be conveyed to law enforcement.

Continental Divide National Scenic Trail

Letter/ Comment #	Summary Statement	Recreation, Continental Divide National Scenic Trail - Response to Comments
02272011-01-5	Concern about lack of trail maintenance and signing on the Gila National Forest.	Maintenance and signing of the nonmotorized trail system is outside the scope of this project. We encourage the commenter to consult with the individual ranger districts about their trail maintenance needs and concerns and future trail expansion for the nonmotorized trail system.
03042011-25-1/3 03072011-21-81 03072011-65-3/4/8/9/10	The DEIS contains no discussion of the impacts of any of the alternatives on the CDNST and on the conservation and enjoyment of the qualities of the areas along it.	Thank you for your comment. An analysis of the effects of the alternatives to the Continental Divide National Scenic Trail (CDNST) will be added to the FEIS.
03072011-179-3	Proposes the Gila National forest should be virtually roadless.	The Travel Management Rule (TMR) states “the Department believes that National Forests should provide access for both motorized and nonmotorized users in a manner that is environmentally sustainable over the long term.” National forests are managed by law for multiple use

Special Management Areas

Letter/ Comment #	Summary Statement	Recreation, Special Management Areas - Response to Comments
01072011-01-4 01072011-08-3 01072011-21-3 01072011-22-3 01072011-25 to 96-4 01082011-04-3 01082011-07 to 64-4 01092011-05 to 23-4 01102011-09 to 23-4 01112011-02-3 01122011-01-3 01122011-06 to 19-4 01132011-08-4 01132011-15 to 23-4 01142011-04 to 09-4 01162011-01 to 05-4 01172011-02-3 01172011-03-4 01172011-04-4 01182011-10-4 01182011-11-4 01202011-04-4 01202011-05-4 01212011-01-1 01252011-03-4 01262011-05-2 01282011-03-4 01292011-01-3 01292011-04-2 01312011-02-4 01312011-03-4 02022011-02-5 02022011-03-4	Eliminate all new roads and trails in Inventoried Roadless Areas; remove unneeded existing roads. Exclude ORV use in IRAs.	The Roadless Area Conservation Rule (Rule) does not mandate the closing of all motorized roads and trails in Inventoried Roadless Areas (IRAs). The Rule states that a road may not be constructed or reconstructed in IRAs except in specific circumstances as stated in 36 CFR 294.12 (b). Currently, there are 375.5 miles of motorized routes in IRAs. Page 69 of the DEIS summarizes the net reduction in the number of miles of motorized and Maintenance Level 1 (ML-1) (closed) roads and motorized and nonmotorized trails in IRAs under each of the five action alternatives. The net reduction ranges from a low of 11.3 miles under alternative C to 162.9 miles under alternative E. There is a net reduction of 76.1 miles of roads and trails under alternative G, the preferred alternative. The IRA analysis will be updated in the FEIS and specialist report.

Letter/ Comment #	Summary Statement	Recreation, Special Management Areas - Response to Comments
02032011-05-4 02032011-06-4 02072011-06-17 02102011-04-5 02112011-003-4 02112011-004-4 02142011-(002 to 016)-4 02152011-(003 to 006)-4 02162011-(007 to 013)-4 02172011-(002 to 004)-4 02202011-003-4 03032011-14-6 03042011-04-10 03042011-41-3 03062011-24-3 03062011-34-6 03072011-59-2 03072011-77-1 03072011-98-7 03072011-99-5 03072011-179-4		
02042011-02-3	Prohibit cross-country ORV travel. Close and rehabilitate ORV routes in Inventoried Roadless Areas.	36 CFR 212.51(a) requires every national forest and national grassland to designate a system of roads, trails, and areas for motor vehicle use. Once the designations are made, motor vehicle use off designated roads and trails and outside designated areas (i.e., motorized cross-country travel) will be prohibited. Currently, there are 375.5 miles of motorized routes in inventoried roadless areas (IRAs). Page 69 of the DEIS lists the net reduction in the number of miles of roads and trails open to motorized travel in IRAs under each of the five action alternatives. The net reduction ranges from a low of 11.3 miles under alternative C to 162.9 miles under alternative E. There is a net reduction of 76.1 miles under alternative G, the preferred alternative. Chapter 3 of the FEIS summarizes the effects of implementing each alternative on IRAs. As noted on page 8 of the DEIS, decommissioning or the rehabilitation of closed roads is outside the scope of this analysis. Decommissioning of routes may be considered in the future. These will be considered on a case-by-case basis with appropriate NEPA analysis.

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02282011-08-1 03062011-30-1 03072011-78-6/109	Forest Service attempting to expand or create wilderness areas through administrative procedures or by merging roadless areas. Example of this is Forest Road 6 not shown between Nolan and Mother Hubbard roadless areas.	The purpose of this project is to designate roads, trails, and areas for motorized travel as appropriate, and not to make changes to uses allowed on areas of the forest. Changes to existing land allocations (roadless or wilderness) are beyond the scope of this analysis and more suited to a forest plan revision effort. Forest Service Road (FSR) 6 was decommissioned as a road and converted to a motorized ATV trail #61 in a previous NEPA decision. In pre-NEPA meetings, both routes were shown on working maps, but FSR 6 was not shown on any of the NEPA alternative maps as it was decommissioned. ATV Trail #61 is an existing forest trail for motor vehicles less than 50 inches in width. Alternatives C, F, and G propose to maintain this trail as motorized except for a short segment that leads to private land. An alternative ATV route is proposed to avoid the private land. Alternative D non-motorizes a short segment and alternative E non-motorizes the entire length of the trail based on the alternative's criteria.
02282011-08-1a 03022011-15-17 03062011-30-2 03062011-31-5 03072011-78-110	There is failure to clearly disclose the removal of motorized trails in the roadless areas. The agency used the proximity of roads and trails to roadless areas as an element for analysis in consideration of designation of routes.	Consideration of IRAs is to be a part of the designation process under the Travel Management Rule (TMR). Pages 68282 and 68283 of the TMR specifically state that "Responsible officials will consider impacts to nearby wilderness areas, wilderness study areas, and inventoried roadless areas during the designation process." Roads and trails are allowed in IRAs. However, the "Roadless Area Conservation Rule," 36 CFR Part 294, does not exempt or preclude an IRA's analysis under the criteria for designation of roads, trails, and areas under 36 CFR 212.51 of the TMR. There are 375.5 miles of motorized routes in inventoried roadless areas. This is reported on page 56 of the DEIS. Of the 375.5 miles, 4.49 miles are motorized trails open for motorized vehicles less than 50 inches in width. Page 69 displays the change of road miles and motorized trail miles within all roadless areas. For roads, there is an increase in road miles. Alternatives D, E, F, and G reduce road miles, but there continues to be roads within roadless areas. For motorized trails, there are currently 4.5 miles of designated NFS motorized trail within roadless areas. The number of miles of motorized trails proposed under each of the five action alternatives is displayed on page 69 of the DEIS. The number of miles of motorized trails ranges from 0 under alternative E to 52.6 in alternative C. Alternative G, the preferred alternative, proposes 21.9 miles of motorized trails. Currently, the forest is open to cross-country travel and there may be unauthorized trails that have been developed over time that are not part of the National Forest System of roads or trails within roadless areas. Therefore, alternative B does not display any routes created in this manner on the maps.

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03022011-15-17a	The agency references a 'Measurement Indicator 1' regarding “Indirect effects of motorized use, that is, motorized associated impacts adjacent to roadless areas” but does not disclose them in the referenced specialist report.	Thank you for pointing out this error. The FEIS will clarify what measurement indicators are used for analysis of roadless areas.
03072011-21-134/135/137a	The Forest Service is obligated to consider and disclose the effects of designating motorized routes on pending or potential wilderness legislation. The Forest Service is also obligated to consider the effects of route designations on the Roadless Area characteristics outlined in 36 C.F.R. § 294.11.	The FEIS will be updated to include an analysis of Qualities of Wilderness Character including Untrammeled, Natural, Undeveloped and Solitude and primitive or unconfined recreational opportunities for wilderness study areas. Inventoried roadless areas was covered in the DEIS on pages 68–69. The FEIS will update the analysis for Inventoried roadless areas. The FEIS will also analyze the roadless area characteristics including high quality or undisturbed soil , water and air, sources of public drinking water, habitat for threatened, endangered, proposed, candidate , and sensitive species and for those species dependent upon large, undisturbed areas of land, primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation, reference landscapes, natural-appearing landscapes with high scenic quality traditional cultural properties and sacred sites and other locally identified unique characteristics.
03072011-21-136/137 03072011-99-5	We strongly urge the Forest Service to remove any planned open routes within WSAs in the FEIS. We reiterate both the illegality of these planned designations and our staunch opposition to them.	The designation of open routes in wilderness study areas (WSA) is not illegal. The legislation states “that within the areas, current levels of motorized and other uses and improvements shall be permitted to continue subject to such reasonable rules and regulations as the Secretary of Agriculture shall prescribe.” Motor vehicle travel, and cross country motor vehicle travel specifically were allowed and at the time the two areas were designated WSAs and continues to be allowed until designations are made under the Travel Management Rule.

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01092011-06-9 03062011-39-9 03072011-98-9	Roads leading to the Gila, Aldo Leopold and Blue Range Wilderness Areas should end a mile or more short of the boundary. This will remove the temptation to violate the law by riding into the wilderness, and it will shield wilderness visitors and wildlife from the noises of ORVs along the boundary.	P.L. 96-550 states “Congress does not intend that designation of wilderness areas in the state of New Mexico lead to the creation of protected perimeters or buffer zones around each wilderness area. The fact that non-wilderness activities or uses can be seen or heard from areas within the wilderness shall not of itself preclude such activities or uses up to the boundary of the wilderness area.”
03072011-21-29 03072011-21-30 03072011-21-31 03072011-21-32	Manage the San Francisco River to protect existing wild and scenic river study area characteristics and managed to maintain their outstanding remarkable values.	The Decision Notice and Finding of No Significant Impact (DN and FONSI) Gila National Forest Plan Amendment 9 - Protection of Eligible Wild, Scenic or Recreation River Areas incorporates direction to protect eligible rivers (river areas) for their outstandingly remarkable values, and preserve their classification pending determination of their suitability for inclusion in the National Wild and Scenic River System. The following rivers were included in the eligibility findings: Whitewater Creek, Spruce Creek, Middle Fork Gila River, West Fork Gila River, Main Diamond Creek, South Diamond Creek, Holden Prong, and Las Animas Creek. The segments of the San Francisco River located on the Gila National Forest identified as potential wild and scenic river segments in the Forest Plan FEIS were not included within the eligibility findings for wild and scenic rivers and not included in the Forest Plan Amendment listed above. The San Francisco River is included in the eligibility findings within the Apache-Sitgreaves National Forests. These findings identify a segment of the river eligible under the classification of “wild” and a segment of the river eligible under the classification of “recreational.”
01192011-02-40 03022011-15-40 03032011-17-3 03072011-78-105	Noise and User Conflict discussions contradict the Recreation Opportunity Spectrum categories in the Forest Plan.	Noise and User Conflict will be removed from table 16 Summary of Effects within chapter 2 of the FEIS. The DEIS states that 16 percent of the forest currently provides primitive recreation opportunities and 24 percent provides semi-primitive recreation opportunities, totaling 40 percent. These figures are from the Forest Plan FEIS and reflect the current condition at that time. The designations identified for ROS within the Forest Plan are objectives to meet management goals to optimize

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		users' recreational experiences on the Gila National Forest. We agree the forest is composed of 792,584 acres (23 percent) within wilderness and 734,378 (21 percent) acres within inventoried roadless areas (IRAs). The Forest Plan identifies 678,000 acres (20 percent) of IRAs to be managed to maintain semi-primitive ROS characteristics. semi-primitive motorized is characterized as moderately dominant with alterations by man with strong evidence of primitive roads and trails. The DEIS shows 7 percent of the forest as semi-primitive motorized and 53 percent of the forest as roaded natural. Implementation of the Travel Management Rule through the designation of roads, trails, and areas for motorized travel is expected to move us toward ROS objectives. The ROS section of the recreation specialist report for the FEIS will be updated to clarify ROS assessment.

Roads

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01072011-01-8 01072011-25 to 96-8 01082011-06-6 01082011-07 to 64-8 01092011-05 to 23-8 01102011-09 to 23-8 01122011-06 to 19-8 01132011-15 to 23-8 01142011-04 to 09-8 01152011-14-1 01162011-01 to 05-8 01172011-03-8 01172011-04-8 01182011-10-8 01182011-11-8 01202011-04-8 01202011-05-8 01252011-03-8 01282011-03-8 01292011-20-1 01312011-02-8 01312011-03-8 02022011-03-8 02032011-04-4 02032011-05-8 02032011-06-8 02112011-003-8 02112011-004-8 02142011-(002 to 016)-8 02152011-(003 to 006)-8 02162011-(007 to 013)-8 02162011-03-2 02172011-(002 to 004)-8	Given the current funding levels, the Gila National Forest needs to reduce the size of the existing road system to effectively reduce erosion and negative impacts to wildlife, threatened and endangered species habitat and riparian areas.	The final rule does not encourage or discourage motor vehicle use, but rather requires designation of roads, trails, and areas for motor vehicle use. The action alternatives, as described on pages ii and iii of the Summary section of the DEIS, present a range of options that consider access and resources. Each alternative proposes motor vehicle use that meets the criteria of that alternative. The current road maintenance budget covers approximately 10 percent of the existing road system (table 20, page 47 DEIS). None of the alternatives accommodate the current funding levels (table 22, page 48 DEIS). Designating a road system that matches available funding levels would result in a system that would not meet the access needs for public and administrative purposes. All of the proposed action alternatives reduce the number of NFS road miles (table 21, page 48 DEIS). The forest will continue to pursue opportunities (roads specialist report, USDA Forest Service 2010a page 11) to reduce road maintenance needs.

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0220201-003-8 03042011-30-9 03042011-42-2 03052011-24-1 03062011-04-13 03062011-36-1 03062011-39-3 03072011-163-2 03072011-179-2 03072011-197-1		
01152011-09-1 01152011-36-1	Request to explain road numbering and letters.	Each National Forest System road and trail has a number. The number allows the road or trail to be tracked in a database, and gives it a specific designation that can be referred to on maps. The letter following the number generally refers to a branch road or trail. For example, road and trail numbers are used in DEIS tables 6 and 13.
01152011-39-1 02212011-02-5 03042011-11-7 03062011-07-3 03062011-39-3 03062011-49-3 03072011-89-4	The Gila National Forest should not close any roads; simply maintain the roads the forest can afford to maintain and ignore the rest. Others indicated the Forest should post signs indicating “use at your own risk” for those roads the forest can’t afford to maintain. Closure costs (heavy equipment, berms, barricades, etc.) are probably less than the associated maintenance costs with keeping the roads open.	Forest Service policy, as stated in Chapter 7730 of Forest Service Manual 7700, requires forests to maintain NFS roads to accommodate their intended use safely and in accordance with the maintenance criteria associated with their assigned maintenance level. Maintenance criteria address both public safety concerns and resource protection intended to minimize environmental impacts. There is no requirement in the TMR to physically close roads not designated for motorized use. The TMR requires the forest to produce a MVUM reflecting authorized motor vehicle uses. Motor vehicle use that is inconsistent with the designations will be prohibited under §261.13 of the final rule. Roads not designated for motorized use tend to return to resource production (i.e., re-establishment of vegetation such as trees or shrubs) quicker since the road beds aren’t being recompacted by traffic. Pine needles, leaves, and other forest litter eventually cover the road and saplings emerge, reducing the need for road maintenance.
02032011-02-3	Recommendation of a ban on speeds over 15 MPH on any	Speed limits generally are not needed nor recommended on most NFS roads. Experience has shown that motorists’ speeds are usually governed more by road conditions than by posted speed limits. If

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	vehicle travel over selected roads. A ban that would not allow any vehicle without street legal and enclosed cab to be capable of speeds over 15 MPH.	unreasonably low speeds are posted, a large number of drivers will violate the limit. This creates credibility problems with drivers and breeds disrespect for all signs (see EM-7100-15, Chapter 3.9.1, December 2005). Use of street-legal vehicles is an issue subject to state law (see “Public Safety” discussion on page 46 DEIS). State traffic laws apply on NFS roads as provided for in 36 CFR 212.5(a)(1). State governments have long taken the lead in establishing registration, safety, and licensing requirements for motor vehicles and motor vehicle operators, providing a consistent framework for users within state boundaries. The Forest Service wholeheartedly supports this framework.
02032011-04-1 03042011-53-1	Appreciate the reduction of road density by eliminating redundant roads in areas where the road density is too high and protecting forest resources.	Thank you for your comment.
02072011-06-5/21/22	Alternative G is not a sustainable resource option given the limited road maintenance budget. The road maintenance backlog will continue to increase. The road system and the land and water resources will continue to unravel creating more problems in the future. Alternative G doesn’t correct safety hazards in many areas.	None of the alternatives accommodate the current funding levels (table 22, page 49 DEIS). Designating a road system that matches available funding levels would result in a system that would not meet the access needs for public and administrative purposes. All of the proposed action alternatives reduce the number of NFS road miles (table 21, page 48 DEIS). The forest will continue to pursue opportunities (roads specialist report, USDA Forest Service 2010a page 11) to reduce road maintenance needs. In regard to correction of safety hazards, there is no change to OML 3-5 road mileage in any of the action alternatives compared to alternative B (table 21, DEIS). These roads are the main travel ways through the forest or are associated with various forest facilities such as administrative offices or campgrounds. The remaining OML 2 roads are managed for use by high clearance vehicles with low traffic volumes traveling at low speeds. OML 2 roads are not subject to the Highway Safety Act. As stated in the Public Safety section of the DEIS, page 47, no reportable accidents have occurred on National Forest System roads between 2002 and 2007 (last data call). Safety concerns are relatively low for the current road system. The Gila National Forest does not anticipate any changes in traffic volume, composition or traffic patterns after the designated system is published via the MVUM.
02082011-01-2	Forest should build roads around private lands that lock gates and block access to	Creating access around or through private property is outside the scope of travel management. The forest recognizes this as an issue and the Forest Service seeks, wherever possible, to secure or retain public access to Federal lands by purchasing or exchanging rights-of-way and reserving rights-

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	Forest lands beyond the property.	of-way in land exchanges.
02212011-02-6 03032011-16-7 03062011-27-7	The proposed cost savings associated with closing roads or converting roads to motorized trails are only theoretical since only 10 percent of the roads are maintained annually. Some of the maintenance is done by road users as they encounter obstacles such as brush, downed trees, washouts, rubble slides, etc. Very few roads were constructed by the forest but were instead created by users and that the intent of the rule was to designate a system which would require minimal maintenance.	As stated in the “Cost of Maintenance” discussion in the DEIS, the Gila National Forest is currently performing basic custodial maintenance on approximately 10 percent of its existing open road system (table 20, page 47 of DEIS), leaving 90 percent of the roads without any form of maintenance. The objective of the cost analysis is not to portray a cost savings but rather to illustrate that the forest has an unsustainable road system. Any reduction in miles will assist in stretching the road maintenance budget across a smaller remaining network of roads, thereby making strides toward a more sustainable system. All of the proposed action alternatives reduce the number of NFS road miles (table 21, page 48 DEIS). The Forest Service maintains NFS roads and NFS trails in accordance with their management objectives and the availability of funds. Forest Service policy, as stated in Chapter 7730 of Forest Service Manual 7700, requires forests to maintain NFS roads to accommodate their intended use safely and in accordance with the maintenance criteria associated with their assigned maintenance level. Maintenance criteria address both public safety concerns and resource protection intended to minimize environmental impacts. Minimizing erosion by maintaining roadway drainage features is one of the primary objectives regardless of the origins of the road (constructed with heavy equipment or created by users). Removing downed trees, rubble slides and brush does little to keep drainage features functional. Unfortunately, resources are limited, and the Forest Service has a substantial backlog of maintenance needs.
02212011-03-6	Suggests vehicular access has been severely impaired due a lack of maintenance on smaller roads. This has resulted in braided "pioneered" routes around obstructions or wash-outs. These roads should be upgraded and maintained periodically rather than closed.	Page 47 of the DEIS shows that funding for road maintenance is not sufficient enough to maintain or upgrade all of the roads on the Gila National Forest.

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02222011-01-2 02222011-02-2	Suggest that erosion associated with roads is primarily due to lack of or poor maintenance.	Many factors influence erosion associated with roads: type of soil, soil compaction, drainage frequency, maintenance frequency, etc. See “Effects to Soils” starting on page 85 of the DEIS. Proper road maintenance along with appropriate drainage and design features can help reduce soil erosion. As stated in the “Cost of Maintenance” discussion in the DEIS, the Gila National Forest is currently performing basic custodial maintenance on approximately 10 percent of its existing open road system (table 20, page 47 of DEIS) leaving 90 percent of the roads without any form of maintenance.
02222011-01-4	Funding and equipment for road maintenance is minimal. Recommends solutions involving logging, purchasing road maintenance equipment, or hiring contractors.	Thank you for your recommendations, but these actions are outside the scope of Travel Management.
03012011-03-3 03012011-07-3 03042011-44-1 03072011-62-3 03072011-189-4	Request for the Gila National Forest to continue to keep decommissioned and closed roads closed. Others commented that the forest should only open closed and/or decommissioned roads after the appropriate NEPA had been completed. A few commented that the Forest Service is under no obligation to re-analyze roads that were closed or decommissioned under a previous NEPA document.	Nothing in the final rule requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails or in areas on NFS lands and that were made under other authorities, including decisions made in land management plans and travel plans. Alternatively, responsible officials may choose to reconsider past decisions, with public involvement, as necessary to achieve the purposes of the final rule (see page 68268 Federal Register, Vol. 70 No. 216, November 9, 2005). The Gila National Forest developed several alternatives in response to the public comments the forest received on the proposed action. The various alternatives in tables 5 and 8 of the DEIS, show some decommissioned and/or closed roads proposed to be re-opened or converted to motorized trail. The proposal to open or convert closed and decommissioned routes has been included in the analysis captured in the DEIS (a NEPA document).
03052011-37-4 03052011-38-4	The DEIS does not discuss safety concerns	Public safety of the motorized road system is addressed in chapter 3 on pages 46–47 of the DEIS and within the roads specialist report.

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03062011-07-11 03072011-16-4 03072011-([16-001] to [16-662])-4 03072011-(0236 to 0255)-4 03072011-(0276 to 0373)-4		
03062011-04-2	Suggest that too many OML 2 roads have drainage issues and more should have been closed. There is confusion associated with breached closed roads; are breached closed roads considered open or closed? The DEIS makes no distinction between the scenarios above; that all these roads are included in the catchall OML 2 designation.	The action alternatives, as described on pages ii and iii of the summary section of the DEIS, present a range of options that balance the need for access and resource protection. Each alternative proposes motor vehicle use that meets the criteria of that alternative. In regard to drawing distinction between the well-drained roads versus roads which lack sufficient drainage; this issue is beyond the scope of the final rule. The Travel Management Rule requires the forest to produce a motorized vehicle use map (MVUM) reflecting authorized motor vehicle uses. The MVUM will eliminate any confusion as to which roads are open for motorized travel. Motor vehicle use that is inconsistent with the designations will be prohibited under §261.13 of the final rule.
03072011-19-2 03072011-78-61	Well-built roads don't cause erosion or major runoff issues such as old logging roads.	Nearly all roads are subject to some degree of sediment migration. Many factors influence erosion associated with roads: type of soil, soil compaction, drainage frequency, maintenance frequency, etc. Most logging roads were constructed more than 25 years ago. Without adequate maintenance, roadway drainage features stop functioning properly and storm water is given free rein to travel the path of least resistance. In some cases, the amount of sediment migration may go unnoticed. See "Effects to Soils" starting on page 85 of the DEIS. The primary maintenance objective for OML 2 roads is minimizing erosion through the maintenance of roadway drainage features. Due to insufficient budgets, the backlog of maintenance is significant, and thus, some of the older roads may have more deficiencies than some newer roads. The forest acknowledges that continued public use of a road prevents the road from going back to resource production and in doing so, stretches the road maintenance budget across more miles of open roads that need to be maintained to minimize erosion.

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03072011-21-83a	The proposed conversion of open motorized roads to motorized trails would result in less frequent maintenance and lower standards for trails than roads. This could cause increased resource degradation and the false impression that maintenance backlogs are being reduced if trails are excluded from maintenance backlog calculation.	The cost analysis captured on pages 47 through 49 of the DEIS, does not consider the costs of motorized trail maintenance. The cost of maintaining 1 mile of an OML 2 road (table 22, page 49 DEIS) is similar to that of maintaining a motorized trail, and thus, the change is a fraction of a percent. Maintenance needs for roads that are converted into the forest trail system will be included when the road is transferred to the trail system. The FEIS includes a discussion on motorized trail maintenance costs.
03072011-78-53/59	The DEIS fails to address the economic value of the existing roads. Roads were built under timber sales or other contract work and the forest got a free road system.	The development and construction of the road system is outside the scope of this project and is not relevant to the analysis.
03072011-78-57/62	The DEIS does not address the value of allowing the public to keep using the roads so they are not lost. Agency needs to acknowledge that users frequently maintain roads by clearing down trees or boulders from roadway.	One of the primary purposes of road maintenance is to maintain drainage features to prevent erosion. It is helpful when users clear obstacles on routes, but it is only one component of the maintenance needs on roads.
03072011-127-7	What is the financial incentive for the Forest Service to close up to 90 percent of the	The forest is not proposing to reduce the road system by 90 percent. Of the various alternatives analyzed in the DEIS, alternative E proposes the most closures by reducing the miles of open roads by 40 percent (table 21 page 48, DEIS). The Gila National Forest maintains approximately 10 percent

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	roads and how will the mileage reductions affect the employees who manage and maintain the road system?	of its open road system (table 20, page 47 of DEIS). Employees associated with managing and maintaining the road system will continue to perform their current duties.
03072011-137-2	Request that the Gila National Forest respect roads that are routinely used by motorized traffic like that of the continental mountain bike route such as NSF Road 150.	Road150 is a main travel road through the forest and is proposed to remain open to the public for motor vehicle use Mountain bikes are not in the scope of Travel Management. Travel Management is the designation of roads, trails and areas open for motor vehicle use.
03072011-197-2	Recommends the forest consider closing some roads for only part of the year on roads where roads were too wet and use would cause issues.	Table 6 of the DEIS shows roads that are currently proposed for seasonal closure in the various alternatives. The Gila National Forest will continue to pursue additional opportunities (roads specialist report, USDA Forest Service 2010a page 11) to reduce road maintenance needs.

R.S. 2477

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02222011-01-1 02222011-02-1 03022011-32-28 03032011-16-2/4 03042011-11-3 03072011-36-1 03072011-78-37 03072011-121-2a	RS-2477 roads cannot be closed or changed by the Forest Service.	Current Forest Service policy is to defer processing of any RS 2477 assertions, except in cases where there is a demonstrated and compelling need. The Forest Service will administer and manage the use and operation of such roads accordingly, until or unless a court of competent jurisdiction rules in a manner that is contradictory to our findings. Congress has not delegated to the Forest Service the adjudicative authority to conclusively determine whether or not there is a valid RS 2477 right. Only a court of competent jurisdiction can conclusively make such a determination. The burden of proving the existence of an RS 2477 right-of-way in court lies with the claimant. All of the following five elements are required for an appropriate public body to establish a public road under RS 2477 over NFS land: Document that a road must have been constructed or established using public funds.

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		The Federal land was open to entry (prior to establishment of the national forest) and appropriation under public land laws. The documented use was for public road purposes in accordance with applicable territorial or state laws. Must have either formally or informally documented accepting the road as a public highway. Document that the road was never abandoned in accordance with applicable territorial or state law. Appendix C of Catron County's RS-2477 declaration (dated November 4, 2009) included many roads that the forest had already conveyed through easements to the County and are under County jurisdiction. County naming convention of other roads on the list made comparison to the forest road system difficult and requests (April 27, 2010 meeting; May 17, 2010 letter) were unfulfilled for a cross-walk between the County's list and forest road numbers to allow a review for Travel Management. Grant County included a map in their comments to the DEIS regarding RS-2477 routes. A review of the map found most of the roads marked on the map have been conveyed to the County through easements or are main forest roads that are open to motorized use.
03072011-121-2a	4223 L is shown on Catron County list as an RS-2477 road and access be maintained.	See the previous response.

Starting Point

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01192011-02-4/37 01202011-03-6 01242011-04-2/3 02072011-02-2/3/6 02282011-06-2 03012011-11-3 03022011-15-6/24/28 03022011-23-1 03022011-32-1/10 03032011-17-11 03042011-04-3/6	Alternative B (no action) underestimates existing roads and motorized trails, including user-created routes, therefore, estimates using baseline conditions is flawed. Underestimates the amount of MBGR reduction actual use is unknown.	Alternative B does not include unauthorized (user-created) routes, maintenance level 1 closed, or decommissioned routes. Alternative B displays the existing motorized system for the Gila National Forest which includes those roads that are classified as Maintenance Level 2 through 5 and designated motorized trails as recorded in the respective INFRA databases. With the Forest being open to cross-country travel, there are an unknown amount of miles of unauthorized (user-created) routes that exist across the Forest and within roadless areas. We acknowledge through public input over the years, many of the routes were surveyed and recommended for inclusion in the Travel Management process. A full inventory across the Forest was not completed and per direction, the Forest does not have to inventory these routes. The Forest's interpretation of the existing condition as being that shown in the INFRA database (Maintenance Level 2 through 5 roads and motorized trails) precluded displaying the routes provided

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03042011-11-6 03042011-17-6/11 03042011-48-5 03042011-55-2/3/5/6 03042011-57-1 03052011-39-1 03062011-31-3/8 03072011-23-1 03072011-78-94 03072011-81-2/3 03072011-120-5a		by the public as part of alternative B. Due to the Forest being open to cross-country travel the entire acreage (approximately 2.44 million acres) of National Forest System land outside of wilderness and other areas restricted to off-road vehicles was used for alternative B during assessment of all possible motorized activities off of the motorized system (DEIS page 44). We also acknowledged that the entire acreage was not available for use by motor vehicles. So, the miles of unauthorized routes inventoried and not inventoried; maintenance level 1 closed; or decommissioned routes being used were included in the acreage and assessed there. Changes to the motorized system in the action alternatives were consistently compared to the base number developed in alternative B.
03012011-03-3 03022011-17-2 03042011-44-1 03052011-15-1a 03072011-180-3 03072011-189-4	Felt that there was misinformation being presented over the almost 1,200 miles of roads in the DEIS. These were closed by the Forest Service but confusion stems from the Forest being open to cross-country and continued use of these roads. These roads are not required for inclusion in the Travel Management Plan. Request the Gila National Forest continue to keep decommissioned and closed roads closed.	Thank you for your comment. Nothing in the final rule requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails or in areas on NFS lands and that were made under other authorities, including decisions made in land management plans and travel plans. Alternatively, responsible officials may choose to reconsider past decisions, with public involvement, as necessary to achieve the purposes of the final rule (see page 68268 Federal Register, Vol. 70 No. 216, November 9, 2005). The Gila National Forest developed several alternatives in response to the public comments the forest received on the proposed action. The various alternatives in Tables 5 and 8 of the FEIS display decommissioned and/or closed roads proposed to be re-opened or converted to motorized trail. The proposal to open/convert closed and decommissioned routes has been included in the analysis captured in the DEIS (see discussion titled “Reopening Roads” or “Adding New Roads to the System” on page 14 of the DEIS).
03072011-21-49/53/57/68/ 70/71/74	The Gila National Forest has incorrectly included user-created routes, decommissioned routes, or old logging roads in the baseline system resulting in an inaccurate No Action Alternative in the DEIS for this	As stated in the TAP, the forest acknowledges that routes indicated as user routes in the Travel Information System (TIS) database were incorporated into INFRA as National Forest System roads when the data was changed over from TIS to INFRA. From May 2010 TAP report pages 9-10: The Gila National Forest conducted a GPS inventory of the road system from 1992 through 1999. The inventory identified user-created routes that were recorded in the corporate database, Travel Information System (TIS). When the Forest Service adopted the current

Letter/ Comment #	Summary Statement	Roads, Starting Point – Response to Comments
	project.	corporate database, INFRA Travel Routes (INFRA), in the late 1990s all road data was converted from the TIS to the INFRA format. Unfortunately, the "user-created" field was not converted to INFRA and the Gila National Forest lost their "user-created" identifier. The Gila National Forest then made a decision, with the concurrence of the Regional Office to continue inventorying "user-created" roads in their database and to code them as National Forest System Roads (NFSRs) operating at a Maintenance Level 2. At that time, the features to track "user-created" roads were not available. As a result, the existing inventory of NFSRs coded as Operational Maintenance Level 2, on the Gila NF now consists of a combination of: 1) "User-created" routes that were inventoried in TIS, 2) "User-created" routes that were inventoried in INFRA before the Roads Policy, 3) FS authorized routes not managed as NFSRs, and 4) All NFSRs operated at Maintenance Level 2. The Gila National Forest completed most of its inventory of "unauthorized" roads before the tools to track them separately became available in 2001, and at this time, the Gila National Forest cannot determine exactly which of their existing NFSRs are "user-created." The Forest acknowledges there may be errors in the INFRA database entries and associated mapped routes. The routes described above are included in alternative B. The effects of those roads on the environment are assessed in chapter 3 of the DEIS.
03072011-21-72	How were motorized trails converted to the INFRA database from TIS?	Unlike the roads conversion from TIS to INFRA, the conversion of the trails databases is not documented. The approximately 15 miles of motorized trails within INFRA database were reviewed and their designed use as ATV trails were checked and confirmed by the respective ranger districts prior to beginning NEPA.

Route- or Area-Specific Comments

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
All route or area-specific comments.	Desire for roads, routes, or areas to be open or closed to motor vehicle use, including motorized dispersed camping corridors and motorized big game retrieval.	There are differing opinions on some roads, routes, or areas to be either open or closed to motor vehicle use. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
02282011-08-1	Road 6 – Concern that NFS Road 6 is shown as decommissioned and all vehicle traffic eliminated allowing for two roadless areas to be connected across the Dry Blue.	In the Dry Blue, previous NEPA processes decommissioned Road 6 as a road and it was converted to a motorized ATV trail #61 (open to motorized vehicles less than 50 inches in width). Road 6 was shown on maps as decommissioned during pre-NEPA meetings, but was not shown on any of the alternative maps since the decommissioning of that road was made under a previous NEPA decision. Per NEPA, notice and comment was provided during the release of the DEIS on proposed changes to the motorized trail #61. Alternatives for ATV trail #61 varied by alternative. Alternatives C, F, and G maintained the ATV trail #61 as motorized, and alternatives D and E proposed non-motorizing a portion (alternative D) and all (alternative E) of the trail. Roadless or wilderness considerations are outside the scope of this project.
03072011-78-77	Road 13 – Disagrees with changing Road 13 from open to all vehicles to street-legal vehicles only. Feels this eliminates certain people and vehicles.	The segment of Road 13 that goes through the Quemado Lake Recreation Area boundary and all campground roads within the boundary are proposed open to street-legal vehicles only. There is a high amount of vehicle traffic and foot traffic within the campgrounds and between the campgrounds and the lake. Vehicles also park along the side of Road 13, adding to the traffic. There are opportunities on the east side of the recreation area boundary to park trailers or camp. From these areas, the opportunities for ATV or other motor vehicles are accessible.
01192011-01-1b	Road 18 – Desire for Road 18 to be open.	Road 18 is open to the private land boundary from either end. The Forest Service will continue to look for opportunities to acquire right-of-ways across private land.
02112011-04-2 02242011-01-1	Road 32 - Route 32 should be closed from private land	Route 32 from the Reserve end of the road is proposed for administrative use for private land access in all action alternatives to private land in sections 9 and 21 T8S R19W. The segment

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03072011-21-8	downstream because route does not exist due to flooding and route is within the Devils Park Roadless area.	between the parcel in section 21 to the parcel in section 29 is decommissioned. The segment of road between section 29 (T8S R19W) and section 14 (T9S R20W) is proposed for administrative use only to access private lands, which minimizes use. This route is considered by Catron County as RS-2477, however the route has not been adjudicated by a competent court. In reference to the roadless area, this route was established prior to the roadless area designation.
01192011-01-1c	Open up FR 40	The forest does not have a road ”40.” The road database includes Roads 40 A, D, and E. All are proposed open to motor vehicle use in all action alternatives.
03072011-25-11(1)	Road 49 – Designate as closed or open for administrative purposes only.	Road 49 is a main arterial collector road on the Reserve and Quemado Ranger Districts. It is motorized in all alternatives. Provides access to private lands, variety of range, wildlife, and watershed improvements, and accesses a large amount of forest for public use.
01292011-20-8	Roads 51, 526, 179 are all parallel and two need to be closed.	All routes are proposed open to motor vehicle use in all action alternatives, except Road 179, which is proposed to be closed to motor vehicle use in alternative E. Road 51 accesses Lower Sheep Basin and Bear Tank, Road 526 accesses Indian Tank, and Road 179 accesses lower Sign Camp Canyon a traditional recreational area. All three routes are parallel; however they have individual destination points and are separated by ridgelines and steep terrain.
01292011-18-2 03032011-14-4 03052011-17-1/2 03062011-20-3 03072011-119-3 03072011-200-1 03072011-21-6/7/8/20/60 03072011-213-2 03072011-53-7 03072011-99-3	Road 68 – Support the closure of Road 68 where it is located within Big Dry Creek and Little Dry Creek	Alternative E closes Road 68 at Estes Well and closes the segment from there to the San Francisco River. Alternatives C, D, F, and G maintain the road as open for access to the San Francisco River.

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02112011-01-10a 02282011-07-3g 03072011-102-2d	Road 68 – Maintain Road 68 as open to motor vehicle use to allow access to the San Francisco River and Road 4223 L. Maintain camping opportunities where Roads 68 and 4223 L intersect.	Alternative E closes Road 68 at Estes Well and closes the segment from there to the San Francisco River. Alternatives C, D, F, and G maintain the road as open for access to the San Francisco River. Opportunities to camp in alternatives C, D, F, and G near the San Francisco are maintained. Distance and proposed spur routes for motorized dispersed camping opportunities vary by alternative.
03072011-25-11(79)	Road 93 E – Close the motorized route or motorized route segment to motorized dispersed camping	Alternative E proposes no motorized dispersed camping. Alternatives C, D, F, and G propose a segment of road for motorized dispersed camping
01192011-01-1d	Road 107 should be open.	The entire length of Road 107 is open to motor vehicle use for the public in alternatives C, F, and G. In alternatives D and E, a 1.3-mile segment of the road is proposed closed to motor vehicle use for the protection of resources.
03022011-03-5	Road 111 A should be closed to protect Tennessee Spring and reduce access onto private land.	Road 111 A is a short road that accesses private property. Landowner indicates that an alternative route to private land is available and would like to have road closed to protect spring and reduce conflict of public driving onto private land. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03072011-25-11(60)	Road 118 – Close Road 118 from SC55 junction north to motorized dispersed camping.	Based on forest observations and comments, alternative(s) will be modified and analyzed in the FEIS.
01152011-01-3 02282011-07-3a	Road 119 needs dispersed camping as there are very good campsites right beside the road that have been used for years.	On the Glenwood Ranger District, opportunities for motorized dispersed camping are limited by the steep topography and vegetation along Road 119. There are a couple of short spur roads off of Road 119 with designated motorized dispersed camping corridors in alternatives C, D, F, and G. On the Reserve Ranger District, alternatives C, D, F, and G have designated motorized dispersed camping corridors for the majority of Road 119 except from mile post 12.6 to 14.0. Between these mile posts, there is a lack of opportunity due to terrain and riparian to pull off 300 feet. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer,

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		from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
02112011-01-8d 02282011-07-3a	Road 119 should be open for its entire length.	Road 119 is proposed open for its entire length to all types of motor vehicles in alternatives C, F, and G. Alternative D proposes to limit a segment between mile posts 5.2 and 8.4 at the junction with 4058 M to vehicles less than 50 inches in width (ATVs). Alternative E closes the segment between mile posts 5.2 and 8.4 to all motor vehicle use.
02232011-04-3	Trail 129 up Railroad Canyon in alternative C is proposed as open to single-track. This goes up a fragile drainage and will conflict with frequent horse and hiker use.	Thank you for your comment. Only alternative C proposes single-track (motorcycles) on Trail 129. Alternatives D, E, F, and G do not propose motor vehicle use on the trail.
03072011-41-1a	Road 141 – Enjoy riding ATVs along Road 141, which is paved.	The designation of vehicle type on Road 141 from milepost 0 to 19 as open to street-legal vehicles was done to not conflict with State Law, which prohibits off-highway (ATV) vehicles on paved roads.
03072011-102-2a	Road 142 – Desire to have Road 142 open. Used for many years to recreate, sight-see and camp with friends and family.	Road 142 is now Catron County road CAT-C012 and is open in all alternatives. This road is now under County jurisdiction.
03072011-102-2b	Road 142 B – Desire to have Road 142 B open. Used for many years to recreate, sight-see and camp with friends and family.	Road 142 B is open in all alternatives except for the last 1.2 miles of the road in alternatives D and E.

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03072011-102-2c	Road 142 C – Desire to have Road 142 C open. Used for many years to recreate, sight-see and camp with friends and family.	Road 142 C is open to where the road begins to drop into the canyon, which a traditional camping site, in alternatives D, E, F, and G. The 0.3-mile segment of road proposed to be closed to motorized use is located within stream channel.
03062011-04-20 03072011-152-5	Road 142 D (Negrito-Snow Lake Area) – Route 142 D should be closed no more than a mile beyond the junction of 4061 M. There are no campsites beyond this point. Canyon bottoms are readily accessible from Snow Lake.	Alternatives C, D, F and G propose this route as motorized for the purpose of having a loop route for hunters and recreational users. Route does need heavy maintenance. Alternative E proposes this entire route closed to motor vehicle use. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
02072011-06-8	Roads 149, 89, and 869 in the Meadow Creek area should be closed to protect wildlife, riparian, and aquatic species.	Road 869 is proposed open to motor vehicle use in alternatives C, F, and G and close to motor vehicle use in alternatives D and E. Road 89 is proposed close to motor vehicle use in alternative E. The last 0.9 mile of the road is proposed close to motor vehicle use in alternatives D, F, and G. Road 149 is proposed close to motor vehicle use for the last 1.2 miles in alternatives D, E, F, and G.
03072011-25-11(2)	Road 150 A – Designate as closed or open for administrative purposes only	Road 150 A leads to private land with multiple landowners and provides access for recreation opportunities to the river.
01152011-09-1	Road 151 – Like to see the side roads off of Powder Horn Road (151) opened to motorized camping.	The majority of Road 151 is proposed to include a corridor for motorized dispersed camping under alternatives C, D, F, and G. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.

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01292011-20-6	Road 152 - Should not be dispersed camping along Road 152 adjacent to the wilderness	There are spots along this segment of road that provides dispersed camping opportunities which are farther than a vehicle length. The topography and vegetation density does not lend itself to allow motorized access into the wilderness.
01292011-20-7	Road 151 and 152 – Road 152 should be closed since it parallels 151.	Roads 151 and 152 are both ridge-top roads that are separated by East Fork Mimbres River. Both provide access to different parts of the forest for a variety of recreational opportunities. Borders the watershed boundary, providing fire management options for wildland fire protection.
03072011-24-5a	Road 157 – Road 157 should be open. This road is used for camping and hunting.	The majority of Road 157 (0 to 14.4 miles) is open to motor vehicle use by the public in alternatives C, D, E, F, and G. Only the last 1.1 miles is proposed for administrative use only.
03062011-27-13a 03072011-102-2r	Road 184 – Desire for Road 184 to be open. Used for many years to recreate, sight-see and camp with friends and family.	Road 184 is open to the public in alternatives C, F, and G. A portion of the road is proposed closed to motor vehicle use in alternative D, and the entire length proposed closed in alternative E.
01232011-02-2 02142011-01-3 03022011-16-1 03042011-42-3a 03042011-52-3 03072011-195-1	Road 196 - Prohibit travel in Little Dry Creek (Road 196) to protect stream and riparian.	Little Dry Creek accesses a parking area and trailhead and ends at private property. The DEIS maintains motorized access to the trailhead in all alternatives. The remainder segment of road, which accesses private land is proposed to be designated to administrative use only. Based on comments. alternative(s) will be modified and analyzed in the FEIS.
03072011-25-11(3)	Road 233 – Designate Road 233 as closed or open for administrative purposes only	Road 233 is a Level 3 route, which is a main arterial route on the Reserve Ranger District. This route has a destination to Eagle Peak Lookout and a primary communication site. All alternatives consider this route as motorized.
02112011-01-11	Road 4069 E – Leave 469e open.	INFRA roads database does not have a Road 469e, but there is a 4069 E. Unfortunately, there is no public access to 4069 E due to a lack of right-of-way across private land.

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01282011-02-1c	Road 500 – Keep 500 open.	Road 500 is proposed open to motor vehicle use in all action alternatives except alternative E. Motorized dispersed camping corridors are proposed in alternatives C, F, and G for approximately the first mile. Topography and wilderness boundary prevent establishment of a 600-foot-wide corridor along most of the road.
01152011-59-2d	Road 506 – Expresses desire for 506 to be closed to motorized use for resource protection	In all action alternatives, a segment of Road 506 between mileposts 4.7 and 6.7, is proposed closed to motor vehicle use between private land and segment proposed for administrative use. The short segment proposed for administrative use accesses private land.
01152011-31-5 02072011-07-1a 03042011-23-1c	Road 506 – Support motorized use of Forest Road 506.	Under all action alternatives, Road 506 is proposed open to Cave Spring and then proposed as ATV only to Bear Creek. This road narrows and hazardous for passage by full-sized vehicles. Currently, there is no legal access through the private land on the east of the road.
01152011-31-6	Road 508 – Expresses desire for Road 508 to stay open	In all action alternatives, Road 508 provides access to Willow Creek Campground, and is proposed to remain open to all motorized vehicles.
03062011-27-13	Road 529 –Desire for Road 529 to stay open	Road 529 is open to the public in all motorized alternatives.
01152011-59-2b	Road 537 – Supports alternative G closure of Road 537 in upper reaches of East Canyon and Quaking Aspen Canyon	Comment supports alternative G, which maintains the first 0.6 mile open to motor vehicle use and closes the rest of the road.
01152011-31-11 02032011-04-6	Expresses desire for Road 537 to stay open to all motor vehicles. Last mile to mile and a half of Road 537 should not be open to just OHV use. There are nice camping opportunities for full-size vehicles within the last mile to mile and a half.	Road 537 is open to motor vehicle use in alternative C. Alternatives D and E close the road to motor vehicle use. Alternatives F and G maintain the first 0.6 mile open to motor vehicle use and close the rest. Alternatives C, F, and G propose a motorized dispersed camping corridor in the first 0.6 mile of the road. During scoping, the proposed action (alternative A, which was eliminated from further study in the DEIS) proposed approximately the last 1.5 miles as a motorized ATV trail. The modified proposed action (alternative F) modified the proposal from ATVs to being closed to motor vehicles. Based on comments, alternative(s) will be modified and analyzed in the FEIS.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
01292011-06-2	Road 545 – Access to private land (Bear Canyon) from Road 545	Public access to private land in Bear Canyon is provided in all alternatives, except alternative E. Alternatives C, D, F, and G provide access from the south off of Road 49 to the private land. Private landowner has access to the private land in all alternatives. There is no through access on Road 545 as all alternatives are proposed closed or administrative access for the landowner. The Forest Service does not have an easement or right-of-way through private lands and therefore cannot show that segment of Road 545 as open to public use.
03072011-126-1	Road 545 is major road providing access between Hardcastle Gap and Toriette Lakes. If intended to be closed, it should be closed in alternative E not C.	There is no through access on Road 545 as the Forest Service does not have an easement or right-of-way through private lands and therefore cannot show that segment of Road 545 as open to public use. All alternatives do provide access from the Hardcastle Gap area to Toriette Lakes by alternative routes. Within alternative C, access to the private land from the north is proposed closed to motorized use as there is access from the South. Within alternative E, access from the north is proposed for administrative access for the landowner as the access from the south is proposed closed in this alternative. Alternative E is the alternative that best protected various resources, and as a result, most roads in this vicinity were closed to motorized use. If this segment of road were closed in alternative E, there would be no way for the landowner to access private land.
02282011-02-2a	I strongly support the closure of Roads 554 and 4077 P in alternative G.	Thank you for your comment. In alternative G, Road 554 is proposed closed to motor vehicle use. A segment of Road 4077 P is closed to motor vehicle use and a portion is motorized where it connects to another road.
03042011-42-4	Road 554 from Sacaton Rd has been previously bermed and closed by Forest Service to prohibit vehicle travel. Road eroded, cut by arroyos.	Road 554 is proposed closed to motor vehicle use in alternatives D, E, F, and G.
01152011-52-1	Desires Road 577 to remain open for access to State land	Thank you for providing the correct road access to State lands from the forest. This road should be open for motorized uses. The intent of the Draft EIS was to show Road 577 open to all motor vehicles under all alternatives

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		for access to State and BLM lands. In the DEIS, the incorrect road segment was identified. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01152011-31-8 03042011-23-1a	Road 590 – Supports motorized use of Road 590.	Alternatives C, F, and G propose a segment of the road open to motor vehicle use for trail access.
01152011-59-2f 01242011-02-2	Road 590 – All of Road 590 should be closed to motorized use for resource protection	Alternatives D and E propose Road 590 closed to motor vehicle use. Alternatives C, F, and G propose to close most of the road to motor vehicle use.
01192011-01-3	Road 642 is marked as a County Maintained Road (CMR).	The portion off of the forest on private lands may be maintained by the County. There is no legal right-of-way access to the portion on the forest.
03032011-04-4	Supports keeping Road 642 open for administrative purposes only	Road 642 is proposed to be closed to motor vehicle use on the forest. The private lands on either side of the forest road outside the forest boundary have alternative access available. The Gila National Forest will continue to pursue opportunities to increase public access.
01202011-02-5	Road 708 – Support closure of Route 708 into Barstow Basin. Considers area too fragile to maintain.	All action alternatives propose most of Road 708 closed to motor vehicle use as it leaves private land toward Barstow Basin.
02282011-07-3b	Road 708 should be left open as it makes a good loop.	Road 708 begins in private property and the Forest Service has no legal right-of-way through the property.
03062011-27-12	Road 730 – Keep Road 730 open.	Road 730 is proposed open to motor vehicle use for the first mile of the road. Beyond this point, the road has washed out and impassable.
02252011-05-1	Establish the end-of-road for Road 734 at Option 1 (junction of 734 and 4081K) Change remainder of Road 734 to single purpose.	The DEIS considered this proposal in alternatives F and G.

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03032011-04-4a	Road 760 – Supports keeping Road 760 open for administrative purposes only	Road 760 is open for administrative purpose in all alternatives. The forest does not have a legal right-of-way. The forest will pursue opportunities to increase public access.
01152011-31-10 03042011-23-1e	Road 778 – Expresses desire for Road 778 to stay open	Alternative C proposes the entire road open to motor vehicle use. Alternatives D, F, and G propose a majority of the road open to motor vehicle use. The proposed segment closed to motor vehicle use is located within a canyon.
03072011-25-11(4)	Road 782 – Designate Road 782 as closed or open for administrative purposes only	Road 782 accesses private land. All alternatives consider this route as motorized.
01152011-03-1 1152011-50-1 01152011-59-2e 03032011-14-1 03052011-23-1/2/3	Expresses support for closure of Road 799 beyond the Feeley Subdivison. Landowners expressed concerns over conflicts they have encountered with users accessing the forest.	Road 799 beyond the Feeley Subdivision is located in a drainage bottom. All alternatives close the segment of road beyond the subdivision to motor vehicle use to protect stream resources and assist in reducing landowner conflicts.
02102011-03-4 02102011-05-4 03052011-23-1a	Supports closing Road 800. Sensitive riparian area. Impacts to private land from ability to access with motor vehicles from Road 800.	There are numerous roads, and user-created routes in the vicinity of Road 800. Under alternative C, a portion of this road that crosses private property is shown as open. This portion of road that crosses private property is shown as closed in all other alternatives.
01152011-31-1	Road 828 – Expresses desire for Road 828 to stay open	Alternative C proposes the entire length of the road to be open to motorized uses. In alternatives D, E, F, and G, segments of varying lengths are proposed to be closed to motorized vehicle use. The majority of the road is proposed to remain open to motorized vehicle use.
01152011-31-2 03042011-23-2a	Road 846 – Expresses desire for Road 846 to stay open	Alternative C proposes the entire length of the road be open to motorized uses. In alternatives D, E, F, and G, the most northern segment that leads to private land is proposed to be closed to motorized vehicle use. Alternative access is available to the private land and the forest does not have a legal right–of-way to travel through the private land. The majority of the road is proposed to

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		remain open to motorized vehicle use.
01152011-13-2	Road 853 – Desires spur roads off of Road 853 to remain open	Spur roads in the Bear Mountain vicinity were analyzed under various alternatives as open and closed to motor vehicle uses.
03032011-01-1/2/3/4/5	Road 853 – Do not support dispersed camping along Road 853 (GNT -1-51) because of private land concerns	Alternatives C, F, and G, dispersed camping has been proposed along Road 853. Alternatives D and E do not propose dispersed camping. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01192011-02-1	Road 859 thru private property needs to be open.	Private landowner has locked gate and issue is outside the scope of this project.
03072011-218-2	Road 859 crosses private property and landowner wants to designate this road as private	Issue of right-of-way is outside the scope of this project.
03072011-218-2a	Road 861 crosses private property and landowner wants to designate this road as private	Issue of right-of-way is outside the scope of this project.
03072011-07-2	Road 882 – Roads off of Road 882 (Head of Ditch) should remain open for ditch maintenance	Roads off of Road 882 are proposed open to motorized use in all alternatives.
02232011-04-2	Road 886 – Alternatives C, F, and G show Road 886 open into headwaters that feed fragile and recovering Tierra Blanca Creek	This road is the only road that accesses this portion of the forest.
02112011-01-17 02282011-07-4i	Road 886, 887 – Supports Road 887 (886) around the Royal John Mine to be open to motor vehicle use.	Road 886, which is the road around Royal John Mine, was proposed to be open to the public for motor vehicle use in all alternatives.

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03072011-24-5b	Road 893 – Desire for Road 893 to be open. This road is used for camping and hunting.	The majority of Road 893 is on private land outside the forest boundary. As Road 893 accesses the forest from private land, it is proposed for administrative use only to the intersection with Road 157.
03072011-07-7b	Road 901 A – Desire for Road 901 A open for motorized access for families, picnics, and have reunions.	Road 901 A is proposed open to motorized use in alternatives C, F, and G and proposed for administrative use in alternatives D and E to access range improvements.
01282011-02-2b	Road 909 – Close Road 909 since access is already limited by locked gates in order to keep Roads 4072K, 4073G, and 500 open.	Many segments of Road 909 are proposed closed to motor vehicle use in all action alternatives due to access and resource concerns.
01192011-01-1a/2	Road 913 – Open up Road 913 to motorized uses.	Unfortunately, the Forest Service does not have a legal right-of-way on the 913 road across the private property. The first section provides camping for the public and parking to walk into the area.
03072011-25-11(5)	Road 974 – Designate Road 974 as closed or open for administrative purposes only	This is the main road associated with Upper End Campground
02112011-01-12 02282011-07-4c	Road 3012 – Road 3012 should be left open.	Road 3012 is a maintenance level 1 closed road. Under all alternatives except alternative E, the segment of 3012 that connects Roads 226 A and 3012 A is proposed to be re-opened to provide access and loop opportunity.
03072011-102-3f	Road 3013 – Road 3013 should be open. Used for many years to recreate, sight-see and camp with friends and family.	Road 3013 is classified as decommissioned in the forest roads database. The road was decommissioned and converted to Trail 74, the Continental Divide Trail.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
03072011-152-10	Road 3074 – Road 3074 between Wine and Sawmill Canyons should be closed at the end of the more open portion of the canyon where it narrows and turns steeply uphill.	Route 3074 is proposed motorized for all alternatives. Purpose of proposal is for access to stock tanks and other range improvements within Sawmill Canyon. This route is not between Sawmill and Wine Canyon, rather it is located within Sawmill Canyon. Route 3074 C is closed. This route continues up Sawmill canyon from Sawmill Tank.
03062011-04-23a 03072011-152-9	Road 3080, 3080B, 3080E, 3070-3072 – these are the roads that are really needed. The balance of routes should be closed for wildlife.	All alternatives except alternative E propose the 3080 route as motorized. Alternative E proposes this route for administrative use for livestock operations and maintenance of range improvements. Route 3080 B is proposed as motorized for all alternatives except alternatives D and E. Route 3080 E is proposed motorized in alternative C and non-motorized for all other alternatives. This route has no destination and is short in nature and redundant. Route 3070 is a main arterial route and is proposed motorized for all alternative. Route 3071 is proposed motorized for all alternatives except alternatives D and E. Route provides loop routes for public use within the Long Canyon Mountains. Route 3072 is proposed non-motorized in alternative E and motorized for all other alternatives. The balance of routes proposed for motorized/non-motorized within the identified area vary in all alternatives. This was developed to address road density concerns, along with impacts to wildlife and habitat.
02212011-01-5p	Keep Route 3223 E Open	Alternative C proposes this route as motorized, all other alternative propose as non-motorized. Route lies within roadless area and has no destination. Parallels other routes within the area.
02212011-01-5j	Road 4000 Q and 4032 G and C to 4000 M and 545 loop route	Road 4000 Q is not associated with these other roads, but 4000 O is and assume a typographical error. Alternative C shows all routes as open to motorized use. Alternative F shows some routes open to motorized use providing a larger loop opportunity.
02212011-01-5f	Road 4001 R and S loop route	Roads 4001 R and 4001 S run down opposite side of a drainage and do not connect to make a loop route.
02212011-01-5c	4003 B, 4002 Q open for loop	All alternatives use 4002 Q and a portion of 4003 B to provide a larger loop opportunity than what the comment desired. Fewer resource impacts are associated with the larger loop opportunity.
02212011-01-5d	Road 4004 A loop route	At the intersection with CAT-B007, there is a segment that is washed out and impassible.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
02212011-01-5e	Road 4004 T, L, E, and M loop route	4004 T intersects with 4004 S to make a loop with 4004 E and L. This loop was considered to be open to motorized use in Alternatives C and F.
03072011-25-11(12)	Road 4007 C – Designate 4007 C as closed or open for administrative purposes only.	Road 4007 C is proposed for administrative purposes in alternatives D, E, F, and G.
03072011-25-11(13)	Road 4007 Z – Designate 4007 Z as closed or open for administrative purposes only.	Road 4007 Z is proposed for administrative purposes in alternatives D, E, F, and G.
01292011-06-1	Road 4008 A – Access on 4008 A across private land and shown closed in alternative C.	The Forest Service does not have legal access across private land located along Road 4008 A between Road 770 and County Road CAT-B029. Statement is incorrect that Road 4008 A is closed in alternative C; the NFS road portion is shown as open to motorized use in alternative C.
01292011-06-3	Road 4008 A, 545 – Landowners with unit-wide elk tags that allow the public to hunt or cross private land, such as lands in vicinity of 4008 A and 545, but the same access is not available to other publics or hunters.	This is not within the scope of this analysis or jurisdiction of the Forest Service.
03072011-25-11(14)	Road 4008 A -Designate 4008 A as closed or open for administrative purposes only.	NFSR 4008 A is proposed for administrative purposes in alternatives D, E, F, and G.
03072011-25-11(15)	Road 4009 J – Designate 4009 J as closed or open for administrative purposes only.	Road 4009 J accesses private inholdings, topography off of this road does not lend itself to driving off the roadway, accesses range and wildlife improvements.
03072011-25-11(16) 03072011-25-11(17)	Road 4010 V and X – Designate 4010 V and X as closed or open for administrative purposes only.	At this time, the forest is not aware of any natural or cultural concerns associated with Road 4010 V or 4010 X, and they are proposed open for motor vehicle use in all action alternatives.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
03072011-25-11(61)	Road 4010 V – Close 4010 V to motorized dispersed camping	Alternative E does not propose dispersed camping corridors.
03072011-25-11(18)	Road 4011 A – Designate 4011 A as closed or open for administrative purposes only.	Road 4011 A is proposed for administrative use in alternative E.
02212011-02-2	4013 T (west half) and 4185 U (Red Steer Spring) keep open to motorized use	Roads 4013 T (west half) and 4185 U are proposed open to motorized use in alternative C. Road 4013 T is proposed to be closed to motorized use because it is located in drainage bottom and washed out in places, has cultural resource issues, and crosses through fragile soils. Road 4185 U is a short (approximately 0.25 mile) spur. The proposed mining claim has no bearing on the proposals made in this project.
02212011-01-5i	Road 4017 A to 4027 B loop route	4017 A does not connect with 4027 B.
02262011-09-1	Road 4017 T – Consider historic / traditional values associated with roads and trails and should be open to motorized use. Example of historic road is 4017 T.	Road 4017 T is open to motorized use in alternative C. All other alternatives propose closed to motorized use due to multiple stream crossings, water quality, and riparian concerns. A short segment near Road 13 is proposed to remain open for motorized dispersed camping opportunities.
02062011-01-1	Road 4018 W – Motorize Road 4018 W for range allotment management (e.g., salting)	Within and accesses Mexican spotted owl protected activity centers. If a need arises for range management purposes, motorized access can be authorized in annual operating instructions. In all alternatives except for alternative E, Road 4018 W is motorized to the tank. Other range improvements are near Hwy 180. Topography of the area is gentle and can be easily accessed with non-motorized means.
03072011-07-7a	Road 4018 X – Open 4018 X for motorized access for families, picnics, and have reunions.	Road 4018 X is proposed closed to motorized use in all alternatives except alternative C. The road is a short spur which ends at a closed road. Also, it is located in two Mexican spotted owl protected activity centers. As an option, family gathering opportunities are available on 4018 W in all alternatives except E.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
02062011-01-1a	Road 4018 Z – Motorize Road 4018 Z for range allotment management	In alternative G, Road 4018 Z is proposed to be open to motorized use for its entire length.
02282011-03-2	Road 4018 Z – Keep open to vehicles less than 50 inches in width connecting to Arizona 275.	In alternatives C and G, the Road 4018 Z is proposed to be open to motorized use for its entire length. Alternatives D and F propose it be open for administrative use to ensure access for ditch maintenance. Alternative E proposed to be closed to motorized use for resource values. Constructed part of 4018 Z never reached Arizona. The connection between 4018 Z and Arizona 275 is a user-created route.
02062011-01-1c	Road 4019 C and G – Motorize 4019 C and G for range allotment management.	This road was re-evaluated based on road work done to contain wildfire during the Wallow Fire. Road 4019 C was opened and cleared and a small portion of 4019 G was also used for control efforts during the Wallow Fire. As a result, 4019 C and G will be proposed to be open to motorized use in all action alternatives except in alternative E.
02212011-01-5b	Road 4020 O – Keep 4020 O as a loop route with 4020 K and 4020 W.	South end of 4020 O is not locatable on the ground; it appears to have grown over to the extent of not being able to locate.
02282011-03-1	Road 4020 Z – Open to motorize use 4020 Z along Dillman Creek to 4026 M off of CAT-B089 to vehicles less than 50 inches in width.	Segment of 4026 M between the intersection of 4026 D and 4026 J was decommissioned. This segment crosses and runs in the bottom Dillman Creek multiple times. The route has been brought up in scoping and other public meetings. We acknowledge that the route does allow access across the forest to the area west of Luna without having to travel the highway, however high resource values associated with Dillman Creek do not warrant providing motorized means of access.
02212011-01-5	Road 4023 V – Open 4023 V as a loop route.	The entire route was considered to be open to motorized use, but due to high resource concern associated with perennial stream, wet meadow, and current resource impacts from motorized uses to the meadow/stream area, all or most of the road was proposed to be closed to motorized uses. In alternatives C and F, a segment on the east side is proposed to be open for motorized use from Road 385 to Jim Smith Trailhead.
03072011-07-6	Road 4026 D provides access to the Luna Rodeo grounds and should be open for parking and camping.	Road 4026 D is open to motorized use in all alternatives except for a segment beyond the Rodeo Grounds in alternative E. In alternative E, there are riparian and cultural resource concerns associated with Road 4026 D.

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02062011-01-1b	Road 4026 G and K – Motorize 4026 G/K for access to the tank.	(Response assumes comment refers to 4026 G, as this road provides access to the tank and no tank is accessed by 4026 K.) In all alternatives, that portion of 4026 G that provides access to the tank and is motorized to the tank or within approximately 100 yards of the tank. Access of 4026 G off of Hwy 180 is proposed closed to motorized use in all alternatives.
03072011-07-5a	Roads 4026 O, 4026 Q, and 4026 R provide emergency exit during flooding for individuals residing south of San Francisco River.	In alternatives C, F, and G, all roads are proposed open to motorized use. In alternatives D and E, a segment of 4026 O which accesses the powerline is proposed for administrative use and the remaining segment to private land is proposed to be closed to motorized use. 4026 O deadends at private land and has a locked gate. We have no easement across the private land. In the event of flooding and wet conditions, it is doubtful that 4026 O could serve as an appropriate egress route because a portion of the road is in the drainage bottom, and is steep sloped with large berms previously placed on this road.
02212011-01-5o	Road 4026 V to 4031 M to 4271 E to 35 keep open to Potato Patch.	In all alternatives, the route from Luna from 4026 V to 35 D to 35 is open to motorized use. 4271 E and 4031 M are not part of the main route; these are spur roads off of 4026 V and 35 D.
03072011-07-5	Road 4026 V [sic 4026 U] gives access to the back portion of our field.	The comment should relate to Road 4026 U, not 4026 V. During previous comment opportunities, this same comment was provided in association with 4026 U. 4026 U is open to motorized use in all alternatives except alternative E.
02212011-01-5k	Road 4028 S to 4183 J; 4181 N to 4139 I creates a loop route	All alternatives provide loop opportunities in this area using various segments of these and other roads.
02212011-01-5g	Road 4028 X, 4136 X, and 306 creates a loop route	4028 X and 306 are motorized and make a loop in alternatives C and F. 4136 X and 306 are both motorized in alternative C, but do not connect to other roads to make a loop.
02212011-01-5m	Road 4029 E, 4029 F, and 4028 P create a loop route and need signs	4029 E, 4029 F, and 4028 P are open for motorized use in alternative C as a loop opportunity. Other loop opportunities are available on other road systems in the same vicinity. Thank you for notifying the forest on signing needs.
03072011-07-1	Road 4030 I and 4030 E open to motorize use to access private property	4030 E is proposed motorized in all alternatives except Alternative E (4025 P is proposed as motorized in Alternative E and provides access to 4030 I). 4030 I is proposed motorized in all alternatives.

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		We cannot detect any road off of 4030 I on the mesa top that accesses that portion of your private land on the mesa top. Access to your parcel is provided by CAT-B003. Motorized cross-country travel across the mesa from 4030 I to that portion of your private land on the mesa top would be prohibited upon signing of the Record of Decision for this EIS and subsequent issuance of the Motor Vehicle Use Map (MVUM).
02212011-01-5h	Road 4030 J provides for a loop route with 4027 O.	4030 J does not tie in with 4027 O and ends at private property.
02062011-01-1d	Road 4030 L and M – Motorize or propose for administrative access 4030 L and M for range management.	Use of these roads cannot be authorized for motorized use or administrative use as the Forest Service does not have an easement or right-of-way across private land.
03072011-07-4	Road 4030 S, 4030 R, 35 G, 35 F, 4271 M, and 4030 T lead to non-NFS roads or trails that dead ends at private property.	In alternative C, all of these roads are proposed to be motorized. In alternatives D, E, and G: 35 F is proposed for administrative use by Tucson Electric Power (TEP) to access the powerline. All other roads are proposed to be closed to motorized use. In alternative F, 35 F is open for administrative use; 4030 S and R are proposed closed to motorized use; and remaining roads are proposed to be open to motorized use to provide loop opportunity. Based on meetings with TEP on their access and maintenance planning, 35 F was identified as a road not used to access their corridor or tower for maintenance. Motorized cross-country travel would be prohibited upon signing of the Record of Decision for this EIS and subsequent issuance of the motor vehicle use map (MVUM). If the problem of prohibited motorized cross-country travel continues after issuance of the MVUM, we will pursue options to remedy such as increased law enforcement presence, signing, working with TEP to gate the access route, etc. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
02212011-02-4a	Road 4033 P may be affected by statement in chapter 2, page 17, “Hells Hole 4C” to be closed to motorized use.	The Hells Hole reference is to the Hells Hole roadless area on the Glenwood Ranger District and is not associated with 4033 P, which is on the Reserve Ranger District near an area called “Hell Hole.” This road is proposed to stay motorized in all action alternatives except for alternative E.

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03042011-25-2a	Road 4035 F – Route 4035 F south of Govina Canyon should be closed, unless CDT trail is realigned as proposed by us for the Reserve Ranger District's Proposed Action of June 2010.	On April 26, 2011, District Ranger John Pierson signed a Decision Memo that would realign 13 miles of the CDT trail with the intent to remove the existing alignment off of the current road system. Portions of this work have been completed and ongoing efforts continue to remove the trail from existing routes including 4035 F. This is being accomplished to relocate sections of the Continental Divide National Scenic Trail that are currently routed on developed multi-use roads.
01312011-01-1	Road 4036 H – Protest the closure of H4036 (Road 4036 H).	Access to subdivision is provided by Catron County road CAT-B036 in all alternatives. Maintenance and road condition is responsibility of Catron County. The developer is responsible for providing access to all lots within the subdivision. 4036 H is a parallel route to the County road and should no longer be required for access.
03072011-25-11(62)	Road 4040 V – Close motorized routes or motorized route segments to motorized dispersed camping on 4040 V from junction with 4180 B to CAT-B056	Alternatives C and G propose motorized dispersed camping from junction of 4040 U to CAT-B056. Alternatives D, E, and F propose no motorized dispersed camping for the entire segment.
03072011-25-11(19)	Road 4042 N – Designate 4042 N as closed or open for administrative purposes only	Route 4042 N is proposed motorized in all alternatives. Route accesses private land and range improvement infrastructure, and provides access to trail 125 (Mail Trail).
03072011-25-11(63)	Road 4042 N – Close motorized routes or motorized route segments to motorized dispersed camping	Alternatives C, D, F, and G propose motorized dispersed camping along the entire segment. Traditional dispersed camping occurs along segments of this route; however, in reality, opportunity is limited along the entire route due to terrain features. Alternative E proposes no motorized dispersed camping. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03072011-25-11(9)	Road 4042 O – Designate 4042 O as closed or open for administrative purposes only	Route 4042 O is proposed for administrative use in alternatives F and G for the purpose of accessing Navapache transmission line. Alternative C proposes route as motorized. Alternatives D and E proposed as closed to motor vehicle use.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
03062011-04-22 03072011-152-7	Road 4047 – In the Y Canyon, E. Long Canyon Mountains area, request route 4047 be closed beyond big tank.	All alternatives consider this route motorized to access Badger Tank off or County road B019. Previous closure efforts beyond Badger Tank have been ineffective. You are correct in this route does not have a destination beyond the stock tank. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01152011-31-17	Road 4048 B – Expresses desire for 4048 B to stay open.	Public access to private land is provided in all alternatives via County Road B054. *Private Landowner* has access to the private land in all alternatives. There is no through access on route 4048 B as all alternatives are proposed closed or administrative access for the landowner. The Forest Service does not have an easement or right-of-way through private lands, and therefore, cannot show that segment of road beyond private property as motorized/open to public use.
01152011-31-15	Road 4050 L – Expresses desire for 4050L to stay open	Route 4050 L is proposed open to motor vehicle use in all alternatives, except alternative E.
03072011-24-4	Road 4052 P – Expresses desire to keep 4052 P open	The first 2.4 miles of Road 4052 P is proposed open to motor vehicle use in alternatives C, F and G.
03072011-24-5	Road 4053 J, 4143 G, 4143 L, 760, 114, and 896 - These roads are used for camping and hunting.	Unfortunately, there is no public access (easement) through private land that the Forest Service can authorize, and therefore, have the roads beyond private open to motorized uses.
01282011-02-2a 02102011-02-1	Road 4053 G should be closed due to erosion issues.	4053 G has no erosion issues, but in discussion with commenter, the concern is on a spur road off of 4053 G, Road 4053 O in section 23. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01152011-31-14	Road 4060 W – Expresses desire for 4060W to stay open	Route is proposed motorized in alternative C and closed to motor vehicle use in alternatives D, E, F, and G. Route is a redundant/parallel route 4060 U, which provides a loop opportunity. Road density and wildlife habitat were concerns in this area.
01152011-31-16	Road 4063 T – Expresses desire for 4063 T to stay open	Road 4063 T is open to motor vehicle use in alternative C and closed to motor vehicle use in the other action alternatives. Road density and wildlife habitat within this area were concerns.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
03072011-102-2f 03072011-102-3b	Road 4065 U – Desire for road 4065 U to be open. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4065 U is open for the first mile in all action alternatives. The road is proposed to be closed to motorized use due to wetland damage, erosion concerns and dead ends at private land boundary. There is alternative road access available to the private land.
03072011-102-2e 03072011-102-3a	Road 4065 Z – Desire for road 4065 Z to be open. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4065 Z ends at private land, the Forest Service does not have a legal right-of-way to cross the private land. 4065 Z is proposed to be closed to motorized use from intersection with 4069 Z to private land (0.8 mile) to reduce conflict with landowner (alternative access is available) due to there being no easement through the private land.
01132011-11-1 02112011-01-9a 02282011-07-3d 03072011-102-2g 03072011-102-3c	Road 4067 M should be kept open. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4067 M was proposed closed in alternatives D, E, F, and G. Road is travelled by high clearance vehicles and provides recreational and scenic opportunities. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03072011-39-1	Road 4068 A – Forest road 4068 A will require a permit to access private property.	Only those roads which are closed to the public, but allow private use require a permit. If the landowner does not wish to restrict public use of the road, no permit is required. Reasonable access to private land is guaranteed under the Alaska Natives Indian Lands Claim Act (ANILCA).
03072011-24-4b 03072011-102-3i	Road 4068 Q – Desire for road 4068 Q to be open. Used for many years to recreate, sight-see and camp with friends and family.	Road is also popular road for ATVs especially during hunting season. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03072011-102-2k 03072011-102-3l	Road 4068 V – Desire for road 4068 V to be open. Used for many years to recreate, sight-see and camp with friends and family.	Short road that accesses private land, but provides good parking off of Hwy 59. Based on comments, alternative(s) will be modified and analyzed in the FEIS.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
02112011-01-11 02282011-07-4a	Road 4069 E – Forest road 4069 E needs to be open to the public either through the private land or a re-routed around the private land.	The Forest Service does not have a legal right-of-way across the private land. An alternate route could be evaluated in the future, but is beyond the scope of this analysis.
03062011-27-10a	Road 4070 J – Desire to have 4070 J open.	Forest road 4070 J is open to the public for motor vehicle use in all action alternatives.
03062011-27-10b 03072011-102-2o 03072011-102-3p	Road 4070 K – Desire for road 4070k to be open. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4070 K is open for motor vehicle use in alternatives C, D, F, and G.
03072011-102-2l 03072011-102-3m	Road 4071 V – Desire for road 4071 V to be open. Vista point at the end of the ridge. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4071 V is open for motor vehicle use in alternative C. Based on comments alternative(s) will be modified and analyzed in the FEIS.
01282011-02-1a	Road 4072 B – Wish to designate the eastern 600 feet of forest road 4072 B within section 31 as open to dispersed camping.	Topography in this segment of road limits distance vehicles may pull off the road. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked; it can be set up any distance from the vehicle.

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02112011-01-9b 02282011-07-3e 03072011-102-2h 03072011-102-3d	Road 4072 B – Desire for road 4072 B to be open. Used for many years to recreate, sight-see and camp with friends and family.	R 4072 B was proposed closed in alternatives D, E, F, and G. Road is travelled by high clearance vehicles and provides recreational and scenic opportunities. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
02282011-07-4b	Road 4072 F needs dispersed camping.	Alternative C, F and G propose the road open to motor vehicle use. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
03072011-102-2q	Road 4072 J – Desire for road 4072 J to be open. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4072 J is proposed open for motor vehicle use in alternative C. Recognize that the location of road 4072 J to other open roads may provide a loop opportunity especially to ATV riders. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01282011-02-1b	Road 4072 K – desire to keep 4072 K open	Forest road 4072 K is proposed open to motor vehicle use in alternatives C, F, and G.
01282011-02-2c	Road 4073 G – desire to have road 4073 G open to all motorized vehicles and have dispersed camping.	Various lengths of Forest road 4073 G are proposed open to motor vehicle use in alternatives C, D, F, and G. Topography limits the proposal for a camping corridor. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
03072011-102-2p 03072011-102-3q	Road 4073 P – desire to have road 4073 P open. Used for many years to recreate, sight-see and camp with friends and family.	The Forest Service currently does not have legal access through private property to the rest of 4073 P beyond the private land.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
03072011-102-3j	Road 4073 R - I want road 4073r open. Used for many years to recreate, sight-see and camp with friends and family.	Alternative C proposes the road be open for motor vehicle use.
03072011-24-4a 03072011-102-2j 03072011-102-3k	Road 4073 S – Desire for Road 4073 S to be open. Used for many years to recreate, sight-see and camp with friends and family.	Road 4073 S is proposed open for motor vehicle use in alternative C. The forest recognizes that Road 4073 S provides access during hunting season and other motorized opportunities. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03072011-102-2i 03072011-102-3g 03072011-102-3e	Road 4073 U – Desire for road 4073 U to be open. Used for many years to recreate, sight-see and camp with friends and family.	Forest road 4073 U is proposed open for motor vehicle use in alternative C. The forest recognizes that Road 4073 U provides access during hunting season and other motorized opportunities including ATVs, picnicking, and camping. Topography and resource concerns do limit a motorized dispersed camping corridor. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03072011-102-2n 03072011-102-3o	Road 4074 F – Desire for road 4074 F to be open. Used for many years to recreate, sight-see and camp with friends and family.	Upon review of location and use of Road 4074 F, it provides access onto and off of the forest and is not blocked by gates. There has been long-term access through the private land. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
02112011-01-9c 02282011-07-3f 03072011-102-2m 03072011-102-3n	Road 4074 G should be open. Used for many years to recreate, sight-see and camp with friends and family.	Road 4074 G was proposed closed in alternatives D, E, F, and G. Road provides ATV and other recreational and scenic opportunities. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03062011-27-10	Road 4074 I – Desire to have road 4074 I open	Road 4074 I is proposed open to motor vehicle use in all action alternatives.

Letter/ Comment # Or Name/Date Letter	Summary Statement	Route- or Area-Specific Comments - Response to Comments
02102011-02-3	Road 4074 K – Reduce the length of road 4074 K to approximately ¼ mile due to erosion concerns.	Concern with stream crossing condition that crosses road 4074 K. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03022011-03-3	Roads 4075W, 4236I, 4236J, and connected roads 4075T, 4210A, 4236O, 4076C, 4076A, 4076Z, 4236L, 8345, 4075U and 4075X are closed to motorized use in alternative G and should be in all alternatives.	The other action alternatives in the DEIS were similar or varied when compared to alternative G proposal for these roads. There is a mix of motorized or non-motorized uses proposed.
03042011-42-6	Road 4077 – Road 4077 appears to be reopened without USFS authorization and crosses a drainage.	Road 4077 is classified as maintenance level 1 – closed from 0 to 1.9 miles and open to motor vehicle use from 1.9 to 2.2 (end of the road). With the forest currently being open to cross-country travel and unless the closed road is signed closed, vehicles may travel on previously closed roads. The implementation of travel management, with the publication of the motor vehicle use map, will clarify and display the roads, trails, and areas open to motor vehicle use.
01292011-20-9	Road 4077L crosses a stream and is parallel to 4055M. 4077 L should be closed.	4077 L is a ridgetop road that parallels an ephemeral drainage. A segment of 4077 L is proposed to be closed to motor vehicle use in alternatives D, E, F, and G for resource protection. Road provides access to range developments and access for hunting.
03042011-42-1a/7	Road 4077 N provides hiking access to the San Francisco River. Large open areas with FS restroom facilities.	4077 N is off of Catron County C035. This road is open to motor vehicle access in all action alternatives. This road system has recreational facilities and trailhead 520, which leads to the San Francisco Hot Springs off of it.
03072011-25-11(10)	Road 4078 O – Designate 4078 O as closed or open for administrative purposes only	Road is proposed to be closed to motorized use in alternative E only.

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03072011-25-11(20)	Road 4078 U – Designate 4078 U as closed or open for administrative purposes only.	In alternatives D and E, from the intersection with 4202 X to the end of 4078 U is open for administrative purposes to access range improvements.
02102011-02-2	Road 4079 – Concern with erosion and condition of road 4079.	Road 4079 is proposed closed to motor vehicle use in alternatives D and E.
03072011-25-11(64)	Road 4079 U – Remove motorized dispersed camping corridors from 4079 U.	There are no proposed dispersed camping corridors proposed for this road. The DEIS proposed one “area”, WA17, which was located at the end of road 4079 U. Based on new resource information, this area is not proposed in any of the action alternatives.
03072011-25-11(21, 22, 25, 27, 29)	Roads 4080 C, 4080 F, 4080 G, 4085 U, 4085 X – Designate as closed or open for administrative purposes only.	This area is popular for dispersed camp and a gathering area for diverse outdoor enthusiasts. Action alternatives vary on how each of the roads are designated.
03072011-25-11(65)	Road 4080 G – Remove motorized dispersed camping corridors from 4080 G.	This area is popular for dispersed camp and a gathering area for diverse outdoor enthusiasts. Alternative E proposes to close this road to motor vehicle use.
03072011-25-11(23)	Road 4080 I – Designate 4080 I as closed or open for administrative purposes only.	4080 I is proposed to be closed to motorized uses in alternatives D, E, F, and G.
03072011-25-11(24, 46)	Road 4080 J, 4206 R – Designate 4080 J and 4206 R as closed or open for administrative purposes only.	Roads are proposed to be closed to motorized uses in all alternatives except a short segment of 4080 J in alternative C to access road 4206 W.
01152011-31-19 03062011-50-6 03062011-41-6	Road 4080 T – Desire for 4080 T to be open. Feel that the road cannot be legally closed as it was road	The road is open from the highway to Mimbres Well. The segment from Mimbres Well to the private land has resource concerns, criss-crosses the stream numerous times, riparian concerns, and leads to private property. There is no legal access through the private land. Alternative route access available from Mimbres Well is available.

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	before the Forest Service existence.	
03072011-25-11(66)	Road 4080 T – Request for motorized dispersed camping corridors to be removed from road 4080 T.	There are no motorized dispersed camping corridors proposed in alternative E. There are short segments of motorized dispersed camping proposed in alternatives C, D, F, and G, which have been traditionally used for dispersed camping, especially during hunting season.
03072011-25-11(26)	Road 4080 X – Designate 4080 X as closed or open for administrative purposes only	Road leads to private land. Maintaining entire length in all action alternatives to provide recreational opportunities except for a segment in alternative E that is closed to motor vehicle use.
02282011-07-4d/4f 02112011-01-13a/13b	Keep dispersed camping on Roads 734 and 4081K	No dispersed camping corridors are proposed on these roads. Roads open to motor vehicle use that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
03072011-25-11(67)	Road 4081 X – Request for motorized dispersed camping corridors be removed from 4081 X.	Alternative E does not propose motorized dispersed camping corridors along the road.
01292011-20-5	Road 4082 –Desire for road 4082 to be closed.	Road 4082 is a decommissioned road. Under alternatives C, F and G, a 0.9-mile segment of the route is proposed to be open for motor vehicle use restricted to vehicles less than 50 inches.
03042011-23-2d	Road 4082 C – Supports motorized use of Road 4082 C.	Alternative C proposed this road as open to motor vehicle use. Alternatives D, F, and G proposed this road as open to motor vehicle use for the first segment then closed to motor vehicle use. Alternative E proposes to close the entire segment to motor vehicle use.
01152011-31-7	Road 4083 Z – Expresses desire for 4083 Z to stay open.	This road crosses through multiple private lands which the Forest Service has no legal right-of-way through. The segment of Forest Service road prior to private land off of BLM land is open to motor vehicle use in all action alternatives.

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03042011-23-2e	Road 4084 G – Supports motorized use of road 4084G.	This road is proposed open to motor vehicle use in all action alternatives.
03042011-23-1f	Road 4084 R – Supports motorized use of Road 4084R.	This road is proposed open to motor vehicle use under alternative C. Alternatives D, E, F, and G proposed to close the road to motor vehicle use. The road is a short spur road less than 1 mile in length.
03042011-23-1g	Road 4084 T – Supports motorized use of Road 4084T.	This road is proposed open to motor vehicle use under alternative C. Alternatives D, E, F and G proposed to close the road to motor vehicle use. Road density was a concern in this area.
03072011-25-11(68)	Road 4085 Q – Desire for motorized dispersed camping corridors be removed from 4085 Q.	There are no motorized dispersed camping corridors proposed in alternative E. Traditional high dispersed camping area and especially during hunting season.
03072011-25-11(69)	Road 4085 X – Desire for motorized dispersed camping corridors be removed from 4085 X.	There are no motorized dispersed camping corridors proposed in alternative E. This area is popular for dispersed camping and a gathering area for diverse outdoor enthusiasts.
03072011-25-11(30)	Road 4085 Y – Designate 4085 Y as closed or open for administrative purposes only.	Road is proposed to be closed to motorized uses in alternative E. Popular access for hunting and motorized loop opportunity.
03072011-25-11(28)	Road 4085 Z – Designate 4085 Z as closed or open for administrative purposes only.	There are alternate parallel roads available to access same areas. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
03022011-03-6	Road 4086 – Support alternative G, except camping should be limited by road 4086 to keep dispersed camping away from corrals, well and drinkers on range allotment.	Motorized dispersed camping corridors are not proposed under alternative G. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.

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03072011-25-11(31, 32)	Road 4086 A and B – Designate 4086 A and B as closed or open for administrative purposes only.	Traffic use is low on these roads and there are resource concerns in the area. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01152011-59-2C 03072011-25-11(33)	Road 4087 A – Expresses desire for 4087 A be closed to motorized use for resource protection.	Road 4087 A is proposed to be closed to motor vehicle use in alternatives D, E, F, and G.
02112011-01 16a 02282011-07-4h 03062011-27-11	Supports 4087 A to remain open	Road 4087 A is proposed open to motor vehicle use in alternative C.
03072011-25-11(34)	Road 4087 B – Designate 4087 B as closed or open for administrative purposes only.	Road 4087 B is proposed open to motor vehicle use in all action alternatives. There are no resource concerns identified in vicinity of this road at this time.
03072011-25-11(35)	Road 4087 C – Designate 4087 C as closed or open for administrative purposes only.	Road 4087 C is proposed open to motor vehicle use in all action alternatives. There are no resource concerns identified in vicinity of this road at this time.
03072011-25-11(70)	Road 4087 C – Desire motorized dispersed camping corridors be removed from 4087 C.	Alternative E does not propose a motorized dispersed camping corridor.
01152011-31-12	Road 4088 K – Expresses desire for 4088 K to stay open	The Forest Service currently does not have legal access through private property to the rest of 4088 K beyond the private land.
03062011-35-2	Road 4089 – Supports designation change for Road 4089 from open motorized to administrative use	Road 4089 is classified as maintenance level 1 closed. No changes to this status are proposed in any of the action alternatives.

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03042011-23-2f	Road 4089 M – Supports motorized use of road 4089M	Alternative C proposes this road to be open for motor vehicle use. Alternative D proposes a segment of the road to be open for vehicles less than 50 inches in width (ATV) as a connector between other routes.
03042011-23-2g	Road 4090 D – Supports motorized use of road 4090D.	Alternative C proposes this road to be open for motor vehicle use. Road leads to private land.
03042011-23-2h	Road 4090 Q – Supports motorized use of road 4090Q.	Alternative C proposes this road to be open for motor vehicle use. Alternatives D, F, and G propose a segment of the road to be open for vehicles less than 50 inches in width (ATV). The portion of the road which overlaps the CDT is proposed to be closed to motor vehicle use in alternatives D, E, F, and G.
03072011-218-1	Road 4090 Y – Desires to change 4090Y from administrative to open for motorized use.	This primary use of this road is to provide access to private property. This road was shown open for motorized use in alternative C and administrative use only in D, E, F, and G.
03072011-218-1a	Road 4090 Y – Segment of road 4090 Y on private should be designated as private.	The segment of road through private property is shown as private in all alternatives.
03072011-218-1b	Road 4090 Y – Should remove camping corridor along 4090Y because this area drains into a stock tank.	There are soft shoulders and little vegetation along the road. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
02282011-02-2 03042011-42-5	Road 4091 should not remain a motorized road. It is too narrow and rugged for full size vehicles. Possibly could be restricted to ATVs.	Road 4091 is open to motor vehicle use in all action alternatives. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
03042011-23-2i	Road 4091 P – Supports motorized use of Road 4091P.	Alternative C proposes 4091 P open to motor vehicle use. Alternatives D, E, F, and G propose this road as closed to motor vehicle use. The road is steep and within an unsatisfactory watershed.

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03042011-23-2j	Road 4091 U – Supports motorized use of Forest Road 4091U.	All action alternatives propose this road as open to motor vehicle use to private property boundary.
03042011-42-3	Road 4092 – 4092 provides access to Little Dry Creek trailhead.	All alternatives maintain Road 4092 open to motor vehicle use. This road provides access to private land parcels.
03072011-25-11(6)	Road 4094 – Designate 4094 as closed or open for administrative purposes only.	Alternatives D and E propose to close the road to motor vehicle use. Alternatives F and G propose approximately the first mile for ATV or vehicles less than 50 inches in width.
02282011-02-3 03042011-42-11	Road 4097 – There needs to be a dispersed camping area at the end of 4097. There is already a parking area there and people need more parking for trail use.	Road ends at private land. Existing open “parking area” is located on private property. The Forest Service does not want to encourage people to camp and trespass on private land. This road is motorized in all alternatives to the private land. Forest Service does not have an easement across private land and cannot authorize motorized use of the segment of the road within and past private land.
03072011-25-11(7)	Road 4106 – Designate 4106 as closed or open for administrative purposes only.	This route was proposed to be closed to motor vehicle use in alternatives F and G. This is an error. The designation for all action alternatives needs to be changed to administrative use only to maintain access to private land. Based on comments alternative(s) will be modified and analyzed in the FEIS.
03042011-23-2k	Road 4120 – Supports motorized use of Road 4120.	All action alternatives propose this road open for administrative use with written authorization only due to private property.
03072011-25-11(8)	Road 4121 – Designate 4121 as closed or open for administrative purposes only.	Alternatives D, F, and G propose the road for ATV or vehicles less than 50 inches in width. Alternative E proposes to close a segment of the road to motor vehicle use.
02212011-01-5a	Road 4130 J – Open 4130 J with 4027 O loop.	Alternatives C and F provide a loop route opportunity with roads 4130 J and 4027 O.

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02282011-10-1	Road 4130 J – Keep 4130 J open for motorized use to the corral.	Access to corral is maintained differently per alternative and access may be from 4130 J or by parallel road system.
01152011-40-1	Road 4134 Q – Maintain access to private property on NFSR 4134 Q.	All alternatives provide access to your private property. This may not be readily visible on the alternative maps provided with the DEIS, as very short road segments such as this do not show on the scale of maps provided with the DEIS. In alternatives D, E, F, and G, this road is proposed for administrative or written authorization use where an easement or permit would be required. The annual fee associated with such permit or easement is not within the scope of this analysis.
03072011-07-3	Road 4135 D should be open for motorized use for ditch maintenance	4135 D is proposed open for motorized use in all alternatives to access private land and for ditch maintenance. The Forest Service does not hold a public easement or right-of-way through the private land to the San Francisco River or south ditch.
03072011-25-11(36)	Road 4135 G – Designate road 4135 G as closed or open for administrative purposes only 4135 G.	NFSR 4135 G is proposed for administrative purposes in alternatives D and E.
03072011-25-11(37)	Road 4140 B – Designate road 4140 B as closed or open for administrative purposes only.	The majority of road 4140 B is proposed to be closed to motor vehicle use in alternatives D, E, F, and G.
03072011-102-3h	Road 4148 C – desire for road 4148c to be open. Used for many years to recreate, sight-see and camp with friends and family.	This road is proposed closed to motor vehicle use in all action alternatives for resource protection.
01152011-31-13	Road 4173 Z – Expresses desire for 4173Z to stay open	Route 4173 Z is proposed open for motor vehicle use to access Gilita Tank in alternatives C, D, F and G. 4173 Z beyond Gilita tank is non-existent due to flooding and lies within a riparian/flood plain. However, it is proposed open for motor vehicle use in alternative C. The road has been flooded out for several years beyond Gilita tank

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03072011-25-11(38)	4179 G – Designate as closed or open for administrative purposes only.	Route 4179 G is considered motorized in all alternatives. Route is access to the Apache Creek Campground.
02212011-01-5q	Road 4180 – desire to keep route 4180 open.	Alternatives C, F, and G propose this road to be open to motor vehicle use. Alternatives D and E propose to close road to motor vehicle use. Road provides access for improvements and fuelwood area.
03072011-25-11(40)	Road 4180 A – Designate as closed or open for administrative purposes only.	Road 4180 A is proposed to be open to motor vehicles use in all alternatives.
03072011-25-11(39)	Road 4180 B – Designate as closed or open for administrative purposes only.	Route 4180 B is proposed open to motor vehicle use in alternatives C, F, and G. Alternatives D and E propose the road to be closed to motor vehicle use.
02212011-01-5l	Road 4181 T to 4032 M loop route	4181 T to 4032 M is open for motorized use in alternative C as a loop opportunity. Other loop opportunities are available on other road systems in same vicinity.
02212011-02-4	Road 4181 Y – Desire to keep open road 4181 Y to motorized use.	In all alternatives, the north end of this road between county road CAT-B030 and private land to the south is open to motorized use. The Forest Service has no easement or right-of-way through private lands, therefore, the portion of this road beyond and between private lands is proposed for Administrative Use by Navopache Electric company to access power lines and cables.
02212011-02-3	Road 4185 T is only access to Benchlands area, which could benefit from thinning and provide firewood permit areas. Favors improving this road.	4185 T is motorized in all alternatives. Thinning, fuelwood permitting, and road improvement, although recognized as important items, are not within the scope of this analysis.
01202011-02-4	Road 4201 I and 4240 J abound the wilderness and could encourage law breakers to cross over.	4240 J is adjacent to the Blue Primitive area in Arizona. 4240 I begins at Catron County C009 and travels southeast away from the primitive area. The DEIS considered alternatives for both motorized and non-motorized status for these roads.

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03052011-35-13	Road 4202 L – Open 4202 L, it connects to 4202 K by ATV route. It is also needed for fire management purposes.	Closing a road does not preclude emergency access or use for fire management options. There is no forest system road or route connecting 4202 L and K. 4202 L is within the vicinity of sensitive resources.
03072011-25-11(42, 71)	Road 4202 W – Designate 4202 W as closed or open for administrative purposes only and remove motorized dispersed camping corridor.	Based on comments and sensitive resources near within vicinity of the road, alternative(s) will be modified and analyzed in the FEIS.
03072011-25-11(43)	Road 4202 X – Designate 4202 X as closed or open for administrative purposes only.	Road is part of Celebration dispersed site and is proposed open to motor vehicle use in all action alternatives. This is a popular recreational site for group or family gatherings and dispersed camping.
03072011-25-11(72)	Road 4202 X – Remove motorized dispersed camping corridors from: 4202 X.	There are no motorized dispersed camping corridors proposed in alternative E. Road is part of Celebration dispersed site.
03072011-25-11(41)	Road 4202 Z – Designate 4202 Z as closed or open for administrative purposes only.	This road is proposed to open for administrative use in all action alternatives. This road is located behind Camp Thunderbird and has no legal public access to the road.
03072011-25-11(73)	Road 4204 A – Remove motorized dispersed camping corridors from: 4204 A.	There are no motorized dispersed camping corridors proposed in alternative E. Traditional high dispersed camping area and especially during hunting season.
03072011-25-11(44)	Road 4204 B – Designate 4204 B as closed or open for administrative purposes only.	This road is proposed open for motor vehicle use in all action alternatives. This is a ridge top road with a couple traditional dispersed camping areas along the road.

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03052011-35-14	Road 4205 J and K should be open. Roads are located within a proposed fuelwood area.	4205 J and K are proposed to be closed to motorized use in alternative G to discourage motorized access into the wilderness. The roads would remain open until the fuelwood area is closed and at that time, Travel Management decision for these roads would be implemented.
03072011-25-11(45)	Road 4205 M – Designate 4205 M closed or open for administrative purposes only.	Road 4205 M is proposed for administrative use or written authorization in all action alternatives.
03052011-35-15	Road 4206 D – Keep Road 4206 D open. It acts as a fireline.	Closing a road does not preclude emergency access or use for fire management options. Alternative C is proposed open to motor vehicle use and alternatives F and G propose to be open to motor vehicles less than 50 inches in width (ATV)
03072011-25-11(48)	Road 4206 D – Designate 4206 D closed or open for administrative purposes only.	Road is proposed to be closed to motor vehicle use in alternatives D and E.
03052011-35-16	Road 4206 E should remain open to motorized traffic. It provides access to fuelwood areas and wildland-urban interface fuelbreaks.	The greenwood fuelwood area is closed and maintenance of fuelbreaks can be done from ATV or foot. The designation of the road does not preclude use for fire management options. Alternatives C, F, and G propose the road to be open to motor vehicles less than 50 inches in width (ATV).
03072011-25-11(74)	Road 4206 H - Remove motorized dispersed camping corridors from: 4206 H	Based on comments and sensitive resources within vicinity of the road, alternative(s) will be modified and analyzed in the FEIS.
03072011-25-11(11)	Road 4206 I – Designate 4206 I as closed or open for administrative purposes only.	Alternatives D and E propose to close the road to motor vehicle use. Alternatives F and G propose the ATV or vehicles less than 50 inches on the route.

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03072011-25-11(47)	Road 4206 S – Designate 4206 S as closed or open for administrative purposes only.	A segment of the road is proposed to be closed to all motorized use in all alternatives especially the portion that overlaps a trail.
01152011-31-9	Road 4206 V – Expresses desire for 4206 V to stay open	Alternative C proposes to keep motor vehicle use open to the public. All other action alternatives propose to close the road to motor vehicle use.
03062011-50-7 03062011-41-5	In alternative G, would like dispersed camping along Road 4208 P, which is a popular camping area during hunting season. The lack may cause a conflict with private land.	In alternative G and other action alternatives, no motorized dispersed camping corridors are proposed. The topography along the road does not lend itself to having a 300-foot designated corridor. Roads open to motor vehicle use, that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
03072011-25-11(49)	Road 4208 Z – Designate Road 4208 Z as closed or open for administrative purposes only.	Alternatives D, E, and F propose the road be closed to motor vehicle use.
03042011-42-1/8	Road 4222 L – Road 422L (assume 4222L) needs a camping area or corridor, especially for RV use, near the highway in relation to map G-10.	Alternatives C, D, F, and G propose motorized dispersed camping corridor from the intersection with the county road for a distance of approximately 0.1 mile.
01072011-06-1 01072011-08-1 01072011-21-1 01072011-22-1 01082011-04-1 01102011-01-1 01102011-04-2 01112011-02-1 01112011-04-1 01122011-01-1	Road 4223 L – Supports or favors closure of San Francisco River road (4223 L) above Mule Creek to motor vehicles. GPR-14, GPR-15, and GPR-16 should not be added in this area for motor vehicle use.	The alternatives propose various motor vehicle access for the San Francisco River (NFSR 4223 L) between Mule Creek and Big Dry Creek. Alternatives D, E, and G propose closing the San Francisco road (4223 L) between Mule Creek and confluence of San Francisco River and Big Dry Creek. Alternatives C, E, and F propose not adding the unauthorized routes GPR 14, 15, and 16 for motor vehicle use.

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01122011-04-2		
01132011-13-6		
01152011-47-3		
01172011-02-1		
01182011-06-2		
01202011-02-2a		
01262011-02-3		
01262011-04-1		
01262011-05-1		
01292011-01-2		
01292011-20-2		
02012011-02-1		
02022011-02-3		
02042011-02-4		
02102011-04-4		
02162011-03-1		
02262011-08-1		
03012011-03-2		
03012011-07-2		
03012011-08-2		
03012011-14-3		
03022011-01-1		
03022011-05-1		
03022011-16-1a		
03022011-17-4		
03022011-24-2		
03022011-26-1		
03032011-09-2		
03032011-14-4		
03042011-13-5		
03042011-28-3		
03042011-29-1		
03042011-30-12		
03042011-35-2		
03042011-44-3		
03042011-46-2		

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03042011-52-2		
03042011-54-1		
03052011-07-1		
03052011-17-1/2		
03052011-18-2		
03052011-19-1		
03052011-20-3		
03052011-21-2		
03052011-23-6		
03052011-25-2		
03052011-31-1		
03062011-06-3		
03062011-08-3		
03062011-20-3		
03062011-34-7		
03062011-35-4		
03062011-43-2		
03062011-45-1		
03072011-53-6b/7		
03072011-101-2		
03072011-103-2		
03072011-114-3		
03072011-116-5		
03072011-119-3		
03072011-200-1		
03072011-207-12a		
03072011-21-20		
03072011-213-2		
03072011-21-6		
03072011-21-60		
03072011-21-60		
03072011-21-7		
03072011-21-8		
03072011-224-3		
03072011-31-1/2		
03072011-62-2a		

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03072011-74-2 03072011-77-2 03072011-98-6 03072011-99-3		
01152011-30-1a 01152011-58-2 01182011-05-1/3 01192011-04-1 01202011-03-5 02262011-06-2 02262011-07-2 02282011-06-3 02282011-07-3g 02282011-10-1 03022011-08-1 03022011-09-1 03042011-17-3 03062011-07-5 03062011-31-6 03072011-14-1a 03072011-173-1 03072011-174-1/4 03072011-175-2	Road 4223 L – Supports maintaining motorized access down the San Francisco River (4223 L). Long-term family recreation uses camping, fishing, OHV riding	Alternatives C and F propose keeping 4223 L open to motor vehicle use down the San Francisco River to Mule Creek. Alternatives D and G provide access to the San Francisco River, but no motorized access down 4223 L to Mule Creek. Routes GPR 14, 15, and 16 (located near the confluence of Big Dry Creek and San Francisco River) proposed in alternatives D and G would provide parking and dispersed camping opportunities off of the main Road 68.
03072011-12-29 03072011-30-1 03072011-21-31/32	Road 4223 L – San Francisco River is an eligible wild and scenic river and should be protected as such.	The San Francisco River is eligible for wild and scenic river status on Apache-Sitgreaves National Forests and has been deemed not eligible on Gila National Forest side.
03072011-21-12a	Road 4223 L – Forest Service must disclose and analyze its potential liability for designating a route that will not be able to be maintained, that is inherently	The Gila National Forest has been managed as “open unless designated closed” forest. This has led to users creating roads into areas that are accessible. The San Francisco road is similar in that it is an old historic road that users created long ago. Based on public comments, some users advocated the road remain motorized while others were opposed. These comments were used during the development of the alternatives. Engineering has worked on some of these drainage-

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	dangerous, does not and cannot meet engineering standards, and that must be re-signed at least twice per year when high water flows obliterate any signage that is put in place.	bottom roads over the years in an effort to minimize impacts to the resource but there isn't a lot that can be done to roads located in drainage bottoms.
03062011-27-9	Road 4229 I – There is a road 9 miles south of Mule Creek. Please do not close the road, like to camp there in the tall pines.	Based on description, we assume that the comment is about Road 4229 I. The Forest Service does not have an easement or prescriptive access through the private land. The road cannot be open to public motorized use without public access across the private land.
01152011-31-18 03042011-23-2l	Road 4233 G – Desire for Road 4233 G to stay open to motor vehicle use.	Alternative C proposes the road to be open to motor vehicle use. Road is within a riparian area and alternatives D, E, F, and G propose to close the road to motor vehicle use.
03042011-23-2m	Road 4233 K – Supports motorized use of Road 4233 K.	Alternative C proposes the road be open to motor vehicle use. Alternatives D, F, and G propose a segment of the road be open to motor vehicles less than 50 inches (ATV).
03062011-27-14	Road 4234 D – Please do not close Antelope Creek road, maybe FD 4234D.	Alternative C proposes that Road 4234 D and adjoining roads remain open to motor vehicle use.
03022011-03-4	Road 4236 C and N – To reduce forest and private land conflicts, would like 4236 N and 4236 C closed. Alternative access is available.	Road 4236 C and N are proposed open to motor vehicle use in all action alternatives. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
01202011-02-6	Road 4240 I and J – Support closure of 4240 I and 4240 J.	Alternative C proposes both roads remain open to motor vehicle use. Alternatives D, E, F, and G propose closing most of Road 4240 I to motor vehicle use except for a short segment to access range improvements. Alternatives D, E, F, and G propose closing 4240 J to motor vehicle use.

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03072011-25-11(50)	Road 4241 Y – Designate 4241 Y as closed or open for administrative purposes only.	Road 4241Y is proposed to be closed to motorized use in alternative E. Road provides ATV opportunity outside of the campground.
03042011-23-2n	Road 4243 N – Supports motorized use of Road 4243N.	Alternative C proposes Road 4243 N be open to motor vehicle use.
03042011-23-1d	Road 4244 C – Supports motorized use of Road 4244 C.	Alternatives C, D, E, F and G propose this road be closed to motor vehicle use from the end of the county road due to no access across private property.
03042011-23-2o	Road 4244 G – Supports motorized use of Road 4244G.	All action alternatives propose the road be open for administrative use. This road leads to private property.
03042011-23-2p	Road 4245 B – Supports motorized use of Road 4245B.	Alternatives C and E propose the road to be open to motor vehicle use.
01152011-31-4 03042011-23-2q	Road 4245 G – Expresses desire for 4245 G to stay open.	Alternative C proposes the entire length of the road to be open to motorized uses. The forest does not have a legal right-of-way through private land, and therefore, the road provides limited forest access.
03072011-25-11(51)	Road 4245 G – Designate 4245 G closed or open for administrative purposes only	Alternative C proposes the entire length of the road to be open to motorized uses. The forest does not have a legal right-of-way through private land, and therefore the road provides limited forest access. Alternatives D, E, F, and G propose the road be closed to motor vehicle use.
03042011-23-2r	Road 4245 P – Supports motorized use of Road 4245P.	Alternative C proposes the road to be open to motor vehicle use. Alternatives D, E, F, and G propose the road be closed to motor vehicle use. 4245 P is a short spur road.
01152011-31-3 03042011-23-2s	Road 4245 Z – Expresses desire for 4245 Z to stay open	Alternative C proposes the entire length of the road be open to motor vehicle use. In alternatives D, E, F, and G, the road is proposed to be closed to motorized vehicle use. The forest does not have a legal right-of-way through private land, and therefore, the road provides limited forest access.
01292011-20-3 03012011-01-3/4/5	Road 4246 – Road 4246 should be closed	Alternative C proposes this road be open to motor vehicle use. Alternatives D, F, and G propose a segment of the road be open to motor vehicles less than 50 inches in width (ATV).

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01292011-20-4 03012011-01-3/4/5 03072011-21-110a	Road 4246 C – Road 4246 C should stay closed due to high erosion	Alternative C proposes this road open to motor vehicle use. Alternatives D, F, and G propose the road be open to motor vehicles less than 50 inches in width (ATV).
03012011-01-5c	Road 4246 J and 819 – Expresses support for closure of 4246 J, and portion of 819 thru subdivision	Road 4246 J is located on private land. The portion of 819 through the subdivision is proposed open to motor vehicle use in all action alternatives.
03072011-25-11(52)	Road 4247 K – Designate 4247 K closed or open for administrative purposes only	Alternatives D, E, F, and G propose to close the road to motor vehicle use beyond private property. The forest does not have legal right-of-way through private land, and therefore, the road provides limited forest access.
03042011-23-2t	Road 4247 U – Supports motorized use of Road 4247U	This road is proposed open to motor vehicle use in all action alternatives.
03042011-23-2u	Road 4247 W – Supports motorized use of Road 4247W	Alternative C proposes the road open to motor vehicle use. All other action alternatives proposed the road closed to motor vehicle use. Road density is a concern in this area.
03042011-23-2v	Road 4247 Y – Supports motorized use of Road 4247Y	Alternative C proposes this road open to motor vehicle use. Alternatives D, F, and G propose the road be open to motor vehicles less than 50 inches in width (ATV).
01152011-02-1	Road 4248 S – Road 4248 S is heavily traveled.	Alternative C proposes this road open to motor vehicle use. Alternatives D, E, F, and G propose to close the road to motor vehicle use. This area has numerous resource issues of concern that are being impacted by use and motorized activities.
03042011-23-2w	Road 4250 B – Supports motorized use of Road 4250B.	Alternative C proposes the road open to motor vehicle use. All other action alternatives proposed the road closed to motor vehicle use. Road density is a concern in this area.
03042011-23-2x	Road 4250 G – Supports motorized use of Road 4250G.	Alternative C proposes the road open to motor vehicle use. All other action alternatives proposed the road closed to motor vehicle use. Road density is a concern in this area.

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03042011-23-2y	Road 4252 S - Supports motorized use of Forest Road 4252S	Alternative C proposes the road open to motor vehicle use. All other action alternatives proposed the road closed to motor vehicle use. Road density is a concern in this area.
01192011-02-2	Road 4257 - Supports 4257 to remain open	Alternative C proposes the road open to motor vehicle use. All other action alternatives proposed the road closed to motor vehicle use. There are resource issues associated with the road.
03072011-25-11(54, 75)	Road 4259 R – designate 4259 R closed or open for administrative purposes only. Close the route or segment of the route to motorized dispersed camping.	The entire or segment of Road 4259 R is proposed open to motor vehicle use in all action alternatives. No motorized dispersed camping corridors are proposed in alternative E. Alternatives C, D, F, and G, propose motorized dispersed corridors. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The Forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
03072011-25-11(53, 55)	Road 4259 S and U – designate 4259 S and 4259 U closed or open for administrative purposes only	Road 4259 S and U are proposed open to motor vehicle use in all action alternatives. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The Forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
02242011-01-1b	Road 4317 T - Route 4317 T needs to be closed	Alternatives C, D, F and G propose the road for administrative use to access range improvements. The purpose is to accomplish maintenance for stock tanks and other range infrastructure.
02242011-01-1a	Road 4317 U - Route 4317 U needs to be closed	Alternatives C, D, F and G propose the road for administrative use to access range improvements. The purpose is to accomplish maintenance for stock tanks and other range infrastructure.
03072011-25-11(56)	Road 4318 D - Designate 4318 D as closed or open for administrative purposes only	Road 4318 D is proposed closed to motor vehicle use in alternatives D and E. Alternatives C, F, and G provide access to improvements and facilities.

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02282011-02-4 03042011-42-10	GPR10 where it enters Little Dry Creek needs to be closed to motorized traffic.	GPR-10 refers specifically to a camping loop route off NFSR 68. This route is 0.03 miles in length and traditionally used as a pull-out for camping. The route is proposed to be motorized and added to the National Forest road system in alternatives C, D, F, and G.
03012011-01-5b	SC1 - trail SC1 should be closed	This trail was removed from further analysis in all action alternatives
03012011-01-5a	SC11 - trail SC11 should be closed	Under Alternatives D and E, this route is proposed to be closed to motor vehicle use. Alternatives C, F, and G propose this route as open to motor vehicles less than 50 inches in width (ATV).
03042011-23-2b	SC21 - Supports motorized use of Trail SC21	All action alternatives except alternative E propose the route as open to motor vehicle less than 50 inches in width (ATV).
03042011-23-2c	SC35 - Supports motorized use of Trail SC35	All action alternatives propose this route for administrative use only by motor vehicles less than 50 inches in width (ATV). This route leads to private property.
02212011-01-5n	FT 61- Dry Blue Trail needs to remain open to AZ	ATV trail 61 (Dry Blue) is proposed open to motorized vehicles <50” in width in Alternatives C, F, and G.
03072011-07-7c	FT 61 - Dry Blue trail open for motorized access for families, picnics, and have reunions.	ATV trail 61 (Dry Blue) is proposed open to motorized vehicles <50” in width in Alternatives C, F, and G. CAT-B002 which accesses the Dry Blue motorized trail is open to motorized use (no County roads are affected by this proposal).
02232011-04-4	FT 747 - Alternative C allows single track motorized use on Trail 747 and has water crossings.	Alternative C does propose a segment of Trail 747 open for single-track (motorcycle) use. All other action alternatives (D, E, F, and G) do not propose any motorized uses on Trail 747
01242011-03-4	FT 79 from Emory Pass to Hillsboro Peak and south to Sawyer’s Peak is not classified on any maps.	Forest trail 79 is not proposed for motorized vehicle travel in alternatives D, E, F, and G and therefore does not show on the alternatives maps. In alternative C, a segment of trail 79 is proposed for single-track (motorcycle) use from Emory Pass south to Forest Road 886, but not north towards Hillsboro Peak. This segment is shown on the Alternative C map.
02232011-04-1	FT 79 - Alternative C shows Trail 79 open to single track motorized use. Divide trail used by hikers	Alternative C does propose a segment of Trail 79 from Emory Pass south to Forest Road 886 to be open for single-track (motorcycle) use.

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	and equestrians and noted for silence and animal sightings.	All other action alternatives (D, E, F, and G) do not propose any motorized uses on Trail 79.
03072011-25-11(57)	R3 area - Designate as closed or open for administrative purposes only	Route R3 is considered in alternatives except Alt E for the purpose of providing an ATV trail open to motorized vehicles less than 50 inches in width.
03072011-21-61	WA-1 - For the Wilderness Ranger District, we noted our concern about potential impacts to Mexican spotted owl habitat from a proposed motorized area. It appears from Table 13 at page 28 of the DEIS that this area will be closed to cross-country travel for motorized uses. However, it is not completely clear if this is the case and we ask the Forest Service to clarify this point.	The area WA-1 which was included in Alternative A, the proposed action, was not proposed in any of the action alternatives within the DEIS.
02222011-004-1	B002 - Consider Catron County Road CAT-B002 to have motorized dispersed camping corridor.	This is a county road, with good surface and potential for higher speeds than most Forest Service roads. The road is on a relative narrow ridge top, the 300 foot designate corridor would extend into potential riparian, aquatic habitat and in addition there are relatively high concentrations of cultural resource sites located adjacent to and within the corridor that may be negatively impacted. Not having a designated camping corridor does not preclude the roadside parking and associated camping along this or any other road designated for motorized use within the various alternatives. Parking is allowed adjacent to roads open to motorized uses. Parking is allowed within one vehicle length or vehicle length plus a trailer from the edge of the road. Camps are not restricted to the parked vehicle and can be set up any distance from the parked vehicle.
03042011-42-9	C001 is closed. It is county maintained and a historic access for the local community to the San Francisco Hot Springs and River. Need to keep open for	C001 is under Catron County jurisdiction. C001 is open to private land. There is parking available with access to the river on the road.

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	river access.	
02282011-02-4a	C025 should be open to motorized dispersed camping and the area.	C025 is under Catron County jurisdiction. C025 leads to 4077 N which is proposed to have motorized dispersed camping corridors under alternatives C, D, F, and G. Roads that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
02112011-01-8b/8c 02282011-07-3c	C036 and C056 – Catron County roads C036 and C056 need more dispersed camping.	Opportunities for motorized dispersed camping are limited by the steep topography and vegetation on C036. C056 was not considered for dispersed motorized camping due to concerns with damage to the county road drainage system by vehicles leaving the road. Camping was provided on lateral roads to C056 on some alternatives. Roads that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
02112011-01-13c 02282011-07-4e	GNT 5-12 - Keep dispersed camping along Grant County road 5-12	Portions of Grant County 5-12 have dispersed camping proposed along its length. Roads that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.

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01202011-02-9	Big Burro Mountain area – Desire for more reduction of roads in the Big Burro Mountain area.	Each of the action alternatives varied the amount of road miles within the Big Burro Mountain area.
03062011-48-3	Road 130 – Would like designated campsites located off Black Hawk. There are good sites in vicinity of the water tank.	Long segment of motorized dispersed camping corridors are proposed in alternatives C, D, F, and G. This route is a major camping and system route within the Burros.
03062011-48-1a	Burro Mountain area – Supports Burros concept in alternative E and the rest of the forest in alternative G	Thank you for your comment.
03042011-25-2	CDT - Does CDT follow routes 4018 A, 4017 K, 4022, or 4017.3?, 4016.2? 4016 M, or 4012 W, 4188 (sic 4188 W)	4018 A, 4017 K, 4022, 4017.3? [4017 B], 4016.2? [4016 Z], 4012 W, and 4188 [4188 W] closely parallels the CDNST in a couple small segments and crosses these routes. CDNST is immediately adjacent to 4018 A as it goes through a tight saddle area near Erman Well. The CDNST is not located on these roads. The CDNST is located on NFSR 4016 M which is proposed to be closed to motorized use and planned to be converted to foot / horse trail.
03072011-65-5	CDT - From S. Boundary of Burros N to HWY 90, CDT trail is along motorized routes.	There are some portions of the CDT that follows motorized routes. However, our goal is to relocate those trails off of motorized routes.
03072011-65-6	CDT - Careful consideration given to how proposed motorized designations may adversely affect CDNST, e.g. Sapillo Campground area.	Motorized use is restricted to designated roads and trails as proposed in the alternatives. The CDNST does overlap a NFSR road through the Sapillo Campground. Where the CDNST leaves the road system, there is an interpretive panel and signs. If in the future, motorized use becomes an issue along the CDNST trail, the Forest Service will take measures such as increased patrols, signing, barricading, etc.
03072011-65-7	CDT - Careful consideration given to how proposed motorized designations may adversely affect CDNST, e.g. trailhead at	Careful consideration was given when determining the location of the south trailhead of CDNST on the Quemado Ranger District. The trail leaves the trailhead in an area where the vegetation does not lend itself to motorized access. In addition a gate was placed where the trail leaves the trailhead. The gate was specifically designed to allow foot, pack and saddle passage and not

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	NFSR 4188 R.	motorized vehicles. If in the future, motorized use becomes an issue along the CDNST trail, the Forest Service will take measures such as increased patrols, signing, barricading, etc. The Forest Service also considered motorized route designation for support and supply points for trail users as well as the potential to contribute to unauthorized motorized use of the trail.
01132011-06-2	Blackhawk Gulch – Interested in Chloride and Beaverhead area, including Lookout, Blackhawk Gulch, and old Boy Scout camp.	Blackhawk Gulch 4157 H road is being considered for closure at the request of the private landowner at the end of the road. Other areas' comments are too general in nature to address specifically other than to say that we have tried to maintain historic access as much as possible.
02202011-07-3i	Devils Park area needs more dispersed camping.	DEIS considers alternatives for the Devil's Park area that range from all but two roads open to motorized dispersed camping to no designated dispersed motorized camping corridors. Roads that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
03062011-04-21 03072011-152-6	Area South of Elk Mountains-area between 7HL and Pitchfork canyons is heavily roaded. Request additional road closures of alternating routes between 4050 D on the west and 4049 R on the east side of area.	The primary route corridor within this area is Road 141, many routes along this primary route currently exist between Route 4050 D and 4049 R. Alternatives D, E, F, and G propose non motorizing several routes within this area to minimize road densities specifically within Sections 13 and 18. Alternative C does not reduce road density. Based on comments, alternative(s) will be modified and analyzed in the FEIS.
01132011-13-5	Supports closing Goat Canyon to motorized vehicles.	The Road that had existed in Goat Canyon was decommissioned due to being with the canyon itself. The current unauthorized (user) route is a popular area for ATV and motorcycles to ride. There is riparian vegetation within the canyon, which is scarce in this area.
03072011-199-3	Harden Cienega and Sawmill loops important for riding ATVs, jeeps and horses. I can see no reason to close the roads.	All action alternatives vary the amount of motorized dispersed camping in the Harden Cienega area.

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01202011-02-8	Haystack Mountain area – Limit ATV use going toward Haystack Mountain to reduce creation of more trails.	Alternative E reduces motor vehicle access toward Haystack Mountain.
03062011-04-23 03072011-152-8	Long Canyon area and roads associated with the Long Canyon Timber Sale – Many roads are redundant. Sections PB49 and PB52 (T6S, R16W) andT6S, R15W, Sec 30, 31, 32 is particularly impacted.	The range of alternatives considers a minimal to a maximum level of road density in regard to designating a transportation system for this area as well as the entire Gila National Forest.
01202011-02-4	Mangus Mountain – Applaud alternative G route proposal near Mangus Mountain	Agreement for alternative G proposed designation.
03072011-21-150	Map G-7 – Protection of wolf packs from vehicular traffic, the following roads on map G-7 should be closed: 30A, 4049F, 4049E, 4048F, 4169F, 4048M, 4169H, 40480, 4048P, 4048Y, 4040Z, 4050Y, 4049G, 4049H, 4309I, 4309F, 533, 4049K, 4141K, 4141E, 141, 142B, 4307Y, 4063, 4063O, 4064D, 4064E, 142C, 4064O.	Many of the roads identified provide motorized dispersed camping opportunities off of main travel roads through the area. The final rule recognizes that the designations of roads, trails, and areas for motor vehicle use are not permanent. Unforeseen changes in effects, public demand, route constructions, and monitoring conducted under 36 CFR §212.57 may lead to the consideration of revising designations. The forest will develop a monitoring plan to evaluate motor vehicle use on the designated system.
01132011-14-1 03072011-228-1	Mineral Creek area – The access road to private property in Mineral Creek R9W, T15S Sections 25 and 26 is not shown on any alternative maps.	The District visited the area and found road location and GPSd road to private land. This omission will be corrected on the FEIS maps and added to INFRA roads database as an NFS Road and shown as open to motor vehicle use in all alternatives.

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01202011-02-7	Pinos Altos range area – Supports closure of numerous spur roads in the Pinos Altos range area.	Alternative E proposes the closure of most of the spur roads within the Pinos Altos range area. All action alternatives vary the amount of reduction of roads within the area.
02112011-01-3	Quemado Lake Area – Needs to be more dispersed camping around or close to the lake.	Quemado Lake is designated as recreation area. As such, there are a variety of camping opportunities ranging from dispersed to fully developed in the vicinity of the lake.
02282011-02-3a	Sacaton area – Support dispersed camping area on Sacaton Road from 180. There is also a nice area in Section 10 that is shady.	All action alternatives vary the amount of motorized dispersed camping in the Sacaton area. Roads that do not have a designated MDC corridor can also be used for dispersed camping. Vehicles would be limited to parking within a vehicle length, including a trailer, from the side of the road. The camp or tent is not restricted to where the vehicle is parked, it can be set up any distance from the vehicle.
02282011-07-3h 03012011-11-2 03022011-15-20 03072011-121-2/3/4/5/6/7 03072011-21-6 to 21-24 03072011-21-135	San Francisco River area – Analysis of the San Francisco River is not considered in the DEIS. This area has recreational and traditional values and natural resource concerns that are not specifically addressed. The lower San Francisco is located within inventoried roadless area and wilderness study area that are not addressed.	The DEIS analysis is forestwide analysis. The area of the San Francisco River was analyzed, but not specifically spoken to within the document. With the specific concern over this area, analysis of the lower San Francisco River will be added to the FEIS.
03012011-01-3/4/5	Sawmill Canyon area – Roads and trails located adjacent and near Sawmill Canyon and Siphon Spings should be closed.	There are numerous roads and user-created routes in the vicinity of the Oak Grove subdivision. Many of these roads were designated as closed and others designated for ATV and motorized use throughout the various alternatives. There were numerous meetings with ATV user groups and subdivision land owners. The various alternatives represent a diverse viewpoint.

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03062011-27-8	Sawmill Tank area needs to be open to motor vehicle use.	Access to Sawmill tank is open to the public in all action alternatives.
02262011-01-1	Cannot tell the various alternative proposals for the road from Sheep's Corral to the wilderness boundary and trailhead to Gila River.	In the Sheep Corral area, Road 4083 V is proposed open in all action alternatives from Road 282 to the wilderness boundary. Road 4083 T is open to motor vehicle use for its full length in alternatives C, F, and G. Alternatives D and E close the last mile to motor vehicle use.
03062011-41-4	Steeple U Ranch – Roads that access tanks on the Steeple U Ranch do not show on map. Road inventory is incomplete.	The Steeple U Ranch is private property. The Forest Service does not inventory roads on private property, but does track those roads that access NFS lands
03042011-07-2/3	Potential closure of access roads and routes that are critical for vehicular access into TEP's existing electrical transmission right-of-way is a concern. Continued use of roads is essential to providing continued safe and reliable electric transmission service.	The forest met with Tucson Electric Power company personnel and reviewed access needs (NFS roads and unauthorized routes) for maintenance of the transmission line during meetings held between January and March of 2012.
03052011-35-12	Camp Thunderbird area – Add user-created routes as roads behind Camp Thunderbird.	The Forest Service, and therefore the public, would not have legal access to these routes. If the Forest Service needs to maintain WUI fuelbreaks behind Camp Thunderbird, the Forest Service will work with the landowners to get appropriate access.
01102011-05-1 01152011-59-2g 02012011-04-1 03062011-06-4/8	Turkey Creek area – Supports closure of road from Gila River Box to Turkey Creek for riparian and resource protection.	Access to Turkey Creek was analyzed in the Draft EIS. Alternatives C, D, E, F, and G analyzed this road as open for administrative use with written authorization, which reduces motorized vehicle use to authorized or permitted users.
01192011-02-15	Turkey Creek is roadless, therefore irrelevant to Travel	There are portions of the Turkey Creek drainage and tributaries that are within roadless polygons. But the main Turkey Creek channel and road system are not located within a roadless area.

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	Management	Currently, there are segments of open motorized roads that extend into or cross roadless boundaries in this area. There are currently several routes that cross and/or travel along Turkey Creek between the wilderness boundary and the stream's confluence with the Gila River. These routes were included in alternatives and analyzed in the DEIS.
01202011-03-4 02282011-07-4g 03072011-173-1a 03072011-175-1 03072011-207-12	Turkey Creek area – Desires road to Turkey Creek to remain open to the Gila Wilderness border. Excellent camping place for many years.	Alternatives C thru G propose this road as open for administrative use with written authorization.
01202011-02-2b	Twin Sisters area – Favors limitations around the Twin Sisters area.	Thank you for your comment.
03052011-35-17	Wilderness Ranger District – All roads in alternative G proposed for converting to motor vehicles less than 50 inches (ATV) should remain open to all motorized vehicles. They provide access for planned fuelwood areas or firelines.	The designation of the road/route does not preclude use for fire management options. When projects are proposed in the future, vehicle access and needs would be assessed.

Sensitive Plants

Letter/ Comment #	Summary Statement	Sensitive Plants - Response to Comments
01092011-02-1	Concerned of the impacts of ORV use on native plants within the Gila National Forest.	The Forest Service developed a range of alternatives to address issues as described in the DEIS. The TMR designates roads, trails, and areas as well as corridors for MBGR and access to dispersed camping areas. Some cross-country travel would be allowed in MBGR and MDC corridors and under special authorization. The direct, indirect, and cumulative effects of the proposed action and alternatives on sensitive plant species are disclosed in the DEIS on pages 212–223.
01192011-02-30 03072011-21-144	Motorized routes and trails were not included within the analysis. Believe that not including routes and trails within the analysis is a major defect. Have issues with “discountable” determinations within the analysis.	Page 222 of the DEIS discloses that roads and trails were not included in the analysis. This is the most current data available for the forest to document Sensitive species within the Gila NF. However, information regarding sensitive plants is limited and assumptions were made for the analysis per 40CFR 1502.22. “Discountable” determinations within the analysis were concluded due to the impacts being immeasurable or extremely unlikely to occur. Alternatives were analyzed for dispersed camping corridors and motorized big game retrieval within the forest and sensitive species occurrences. See DEIS page 222 General Effects to Plants for effects of unauthorized motorized routes.
03072011-21-142/143	Lack of information on Sensitive Plant Species may lead to the decline of sensitive species. Corridors have not been surveyed for sensitive plants within motorized dispersed camping and big game retrieval corridors.	The data used for the sensitive plants species section consisted of information from Natural Heritage New Mexico, New Mexico Biodiversity Collections Consortium, and NMC Herbarium at New Mexico State University. This is the most current data available for the forest to document sensitive species within the Gila NF. However, information regarding sensitive plants is limited and assumptions were made for the analysis per 40CFR 1502.22. Future project-level analysis will include evaluation of sensitive plants and design features to protect them if new information is obtained. This is the most current data available for the forest to document sensitive species within the Gila NF. However, information regarding sensitive plants is limited and assumptions were made for the analysis per 40CFR 1502.22. Future project-level analysis will include evaluation of sensitive plants and design features to protect them if new information is obtained. The most current data were used for analyzing sensitive plants. Most plants are located within wilderness areas or areas that are not topographically possible for roads to exist. The elimination of cross-country travel would benefit sensitive plants by decreasing disturbance. The direct, indirect, and cumulative effects of the proposed action and alternatives on sensitive plant species are disclosed in the DEIS on pages 212–223.

Letter/ Comment #	Summary Statement	Sensitive Plants - Response to Comments
03072011-21-142a	Concerned of the determinations of “May Impact” and “No Impact” are not based on real or current knowledge.	These determinations were based on where plants are found within the Gila NF and information from Natural Heritage New Mexico, New Mexico Biodiversity Collections Consortium, and NMC Herbarium at New Mexico State University. Plants that were found within the Gila Wilderness had a No Impact because there are no roads within wilderness areas. “May Impact” determinations covered the possibilities of plants occurring in undocumented areas that met the habitat requirements. With the elimination of cross-country travel, the effects to sensitive plants would decrease.
03072011-21-145	Conclusions within table 142 are inadequately explained.	These conclusions are discussed on page 222 of the DEIS under Environmental Consequences.

Social and Economics

Letter/ Comment #	Summary Statement	Social and Economics - Response to Comments
01152011-23-1	Game retrieval limits will hurt the hunting industry.	The socioeconomic specialist report identifies potential tradeoffs to the hunting sector. Restrictions may cause some people to not hunt on the Gila NF, however, if they continue to hunt in the local area (county region) there will be no net economic consequence. Furthermore, restrictions on motorized retrieval may cause some to hire an outfitter guide for game retrieval, which could increase hunting-related expenditures (and associated local economic impact) (page 22 of the social and economic specialist report).
01182011-04-1	Economic cost of road closure will be very high due to decline in visitors to the forest.	If people choose not to recreate on the Gila NF, they will engage in substitution behavior. In many instances, people will still recreate or participate in an activity in the local area, which would continue to have an economic benefit. There are two sides to the economic cost of road closure: the cost is a possible decline in forest visitation, however, the economic benefit from improved ecological health has non-market economic values (page 22 of the social and economic specialist report).
01182011-08-4	It will be expensive for the Forest Service to close roads.	Open roads entail enforcement costs as well. Furthermore, open roads entail maintenance costs. As a result, road closure will not increase forest expenditures. The cost of road maintenance analysis in the DEIS (pages 47–49) finds that all action alternatives would decrease annual road maintenance expenditures.
01192011-02-34 02252011-06-1 03022011-32-17	Must address need for fuelwood gathering in current economic environment/increasing energy prices.	Firewood gathering is permitted under all alternatives and gathering sites with motorized access will be available. The amount of firewood available at the gathering sites exceeds the historic numbers of firewood permits issued (as shown in the socioeconomic specialist report). Therefore, no shortage of firewood available for motorized pick up is expected (DEIS page 256 and the social and economic specialist report pages 12 and 21).
01192011-02-46	Low household income in planning area will be further decreased by travel management.	The social and economic analysis finds no disproportionate or adverse effect on low income households in the planning area (DEIS page 258).
02042011-01-2	Cost of road closures will affect county and state revenues and federal government administration costs.	Fewer roads to manage or maintain may decrease Forest Service expenditures Road closures will not affect administratively permitted activities (e.g., grazing and mining) that contribute to county and state revenues. Therefore, no change to county and state revenues will occur (DEIS page 257).

Letter/ Comment #	Summary Statement	Social and Economics - Response to Comments
02232011-02-2 03022011-32-18	Road closures will reduce economic well-being of individuals who rely on the land (e.g., ranchers).	Access will continue for administrative purposes (e.g., grazing, emergency services) per 36 CFR 212.51, 36 CFR 212.51(a)(8), and 36 CFR 261.13(h).
02242011-04-3	Cost of “terminal facility” for dispersed camping cannot be borne with increasing budget deficits.	Outside the scope of this project. The forest did not propose any facilities associated with dispersed camping in the DEIS.
02262011-09-3 03022011-32-17	Firewood collection helps to survive on limited income.	Firewood gathering is permitted under all alternatives and gathering sites with motorized access will be available. The amount of firewood available at the gathering sites exceeds the historic number of firewood permits issued (as shown in the socioeconomic specialist report pages 12 and 21). Therefore, no shortage of firewood available for motorized pick up is expected (DEIS page 256).
02282011-06-1 03032011-06-4/5 03062011-31-7 03072011-34-6	Analysis underestimates the economic consequences of recreation.	The economic impacts were analyzed again with updated data. The social and economic analysis has been updated accordingly. However, the changes in employment and income are relatively minor, particularly within the context of the regional economy. The economic impact estimates are not estimates of visitor expenditures, but rather a reflection of money being introduced and recycled through the local economy. If a visitor purchases gasoline at a local station for their OHVs, only a fraction of the purchase price remains in the local economy. Much of the money leaks out of the regional economy (e.g., to oil producers in other states or nations). (Discussed in economic methods section.)
03022011-15-4a	Need to include desired social and economic conditions based on a collaborative process.	A collaborative process to define desired social and economic conditions occurred in (1) collaboration with county officials and (2) public meetings. The public involvement process is described on pages 6–8 of the DEIS. The general concerns and issues identified form the basis of the social and economic analysis.

Letter/ Comment #	Summary Statement	Social and Economics - Response to Comments
03022011-15-4b	Information gaps in economic and social data are not compliant with CEQ.	Commenter misunderstands the term “total economic value.” While National Visitor Use Monitoring (NVUM) allows the agency to estimate the market consequences of recreation on the Gila NF, NVUM does not contain information on the non-market value of recreation on the Gila NF. Total economic value includes both market and non-market values. Cost of collecting reliable and defensible consumer surplus estimates would be prohibitive—we would need (a) authorization through the Paperwork Reduction Act to administer a survey, (b) a valid survey instrument, (c) staff to administer survey, (d) staff to input survey results for data analysis (e) an economist to analyze the survey results. Furthermore, the reliability of stated preference techniques is contentious. The Forest Service is not required to provide monetary estimates of non-market values, such as consumer surplus.
03022011-15-4c	Doesn’t use NVUM expenditure data.	NVUM expenditure profiles specific the Gila NF were used for the analysis Visitors to the Gila NF spend less than the average national forest visitor (Stynes and White 2010, page 39). Not all of the money stays in the local area, even if it is spent in the local area. For instance, if an OHV user buys $50 of gasoline, much of that money is lost from the local economy through “leakage.” Therefore, multiplying visitor spending by the number of visitors does not give an accurate portrayal of economic impacts since only a percentage of the money stays in the local economy. This is why IMPLAN is used to estimate the economic consequences. IMPLAN uses trade flow data to determine how much money is recycled through the local economy. Even if an expensive good is purchased in the local area (e.g., an OHV), only a portion of the sales price is cycled through the local economy (retail mark-up). As a result, expenditure data taken alone can be deceiving and should not be conflated with the economic impact.
03022011-32-8	How can no economic impact exist between alternatives when road mileages change?	As shown in the economic effects analysis in the DEIS and specialist report (pages 24–25), the economic impact of motorized uses on the Gila NF is small, therefore, the change in road miles does not lead to economic differences between alternatives.
03022011-32-12	Road closures have a number of economic costs, including: lost revenue to counties, less visitor spending, reduced home values, and increased cost of operation for ranchers	Access will continue for administrative purposes (e.g., grazing, emergency services). The economic consequences of road closures related to recreation/visitor spending are disclosed in the DEIS and the socioeconomic specialist report. Less than 1 percent of employment and income in the local economy comes from recreation activities on the Gila NF. Therefore, changes will not substantially affect county revenue.

Letter/ Comment #	Summary Statement	Social and Economics - Response to Comments
03032011-06-1 03072011-34-2/3	Should do separate social and economic analysis for Catron County.	Where appropriate, Catron County has been discussed separately in the social and economic section of chapter 3. A separate economic impact analysis for Catron County in chapter 4 is not feasible due to the economic linkages between Catron County and the surrounding counties. A separate economic impact analysis for Catron County would decrease the estimated economic impact, since it would ignore the flow of money between Catron County and other counties in the Gila NF proximity.
03032011-02-3 03032011-06-2 03042011-02-2a 03072011-34-4	Economic value of hunting in Catron County is $15 million, need to consider how reduction will affect county.	The economic analysis considers the economic impact associated with hunting using the most recent NVUM data, which is the best available recreation data specific to the Gila NF. The economic impact to hunting is specified on page 29 of the socioeconomic specialist report.
03032011-06-3 03072011-34-5	Need to supply data to show that firewood in designated areas and along roads will be sufficient to meet demand.	Firewood gathering is permitted under all alternatives and gathering sites with motorized access will be available. The amount of firewood available at the gathering sites exceeds the historic numbers of firewood permits issued (as shown in the DEIS page 256 and socioeconomic specialist report pages 12 and 21). Therefore, no shortage of firewood available for motorized pick up is expected.
03032011-17-13	DEIS fails to adequately analyze the economic contribution of hunting.	Visitor expenditures are available through the NVUM report for the Gila NF. These visitor expenditures are used in the economic impact tool to estimate economic impact. However, it is inappropriate to conflate visitor expenditures with economic impact: not all (or even most) of the expenditures will remain in the local economy. For instance, when gasoline or groceries are purchased locally, only the retail mark-up remains in the local economy. Therefore, $50 spent on gasoline does not translate to $50 of economic impact (page 22 of the social and economic specialist report).
03042011-01-2 03062011-41-8	Forest provides food, wood, and fuel which are needed for economic well-being of local residents.	Access to the Gila NF would remain. In particular, sites for fuelwood collection would be available to ensure that those who heat their homes with wood can continue to collect fuelwood on the forest (DEIS page 256).
03022011-32-27 03042011-04-11 03042011-11-8 03042011-20-9 03072011-79-2 03072011-86-3	Closing roads will affect negatively on custom and culture, tourism, and the economics of surrounding (local) areas.	The economic impact of recreation on the Gila NF is small in the context of the 4-county economy. Economic consequences are disclosed (social and economic specialist report pages 28–29). The potential economic tradeoffs are analyzed.

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03072011-234-1		
01132011-02-2 01192011-02-36 01252011-02-3 02222011-01-3 02222011-02-3 02232011-04-5 02252011-06-1 03022011-32-23 03032011-02-4 03042011-20-7 03052011-35-6 03062011-41-8 03062011-46-3 03072011-72-2 03072011-175-3 03072011-199-1 03072011-207-1	Concern that the ability to collect fuelwood would not be allowed or limited with implementation of Travel Management. Potential adverse impact could result to those who rely on fuelwood with reduction of roads and trails for gathering.	We recognize that access for firewood collection is an important issue to many. Upon implementation of the TMR, the use of motorized vehicles off of the designated road system for the purpose of gathering firewood would be allowed in designated firewood areas, and described within the permit. Firewood gathering may occur along any designated open road; however, vehicle use would be limited to roadside parking. The forest is working toward expanding the amount and location of designated firewood collection areas to facilitate access to available firewood. We will also focus firewood collection areas where fuel reduction or vegetation treatment is needed. Vehicle access will be an important consideration when designating these areas. The forest is working on increasing the number of designated firewood areas in preparation of implementation of Travel Management.
03062011-44-1	Roads are essential for the hunting industry.	The effects of road closures on the economic impact from hunting are disclosed in the social and economic specialist report.
03062011-50-5	The current economic downturn has increased the popularity of the forest.	Comment noted
03072011-126-2	The Gila NF in Catron County is a major destination for elk hunters and road closures will have a significant economic impact related to this use.	The economic consequences of road closures on hunting are disclosed in the social and economic specialist report.
03072011-127-4	The DEIS is biased toward biological, rather than human/economic consequences.	The human and economic impacts are disclosed in the DEIS (pages 256–258).
03072011-135-1 03072011-174-2	Road closures will decrease tourism and hurt the economy	The economic consequences of road closures on tourism are disclosed in the DEIS.

Letter/ Comment #	Summary Statement	Social and Economics - Response to Comments
03072011-175-1		
03072011-151-4	Assumption that the relationship between road miles and economic impacts is linear is not realistic.	The commenter does not offer an alternative method. The assumption of linearity is least likely to bias the economic impact analysis.
03072011-21-139	Include information about the economic benefits of roadless areas to New Mexico's economy (see: Economic and Community Benefits of Protecting New Mexico's Roadless Areas 2006).	This reference has been added to the social and economic specialist report and FEIS.
03072011-21-140	Use the "cost estimator" to demonstrate maintenance cost differential between alternatives.	The annual road maintenance cost, by alternative, is already analyzed in the DEIS on pages 47–49.
03072011-37-7	Economic times change and people should not rely on traditional fields.	Comment noted
03072011-67-2	Multiple use requires an adequate system of NFS roads for economic well-being.	All alternatives continue to support a road network in the Gila NF.
03072011-78-54a	The DEIS does not discuss the value of any trails or sites to human society.	The values of the Gila NF road network are discussed in both social and economic terms. The DEIS discloses the economic impact of road closures. The DEIS also analyzes key social values related to the road network, such as fuelwood collection and dispersed camping (DEIS pages 256 and 257).
03072011-78-54b	The DEIS ignores social attachment to roads, particularly "sense of place" (see: TAP)	Key social values, such as fuelwood collection and dispersed camping, are discussed and analyzed in the DEIS. There is no requirement, and insufficient data, to analyze "sense of place" attachment to the roads (DEIS pages 256 and 257).

Travel Analysis Process / Minimum Road System

Letter/ Comment #	Summary Statement	Travel Analysis Process / Minimum Road System - Response to Comments
03022011-15-10	The Travel Analysis Process (TAP) is based on an analysis put forth and credited to a publication by the Wilderness Society. The use of a non-peer reviewed methodology dooms the TAP as an analysis with the required scientific integrity. The DEIS is therefore lacking scientific integrity and should be revised.	The concept of looking at road density across the whole study area using a consistent size polygon that was displayed in the Wilderness Society document on a study conducted on the Boise National Forest was used as one of the methods of looking at road density on the forest. Gila National Forest boundary in the most part follows section lines. So, the forest used the established section polygons to analyze the road density by section across the forest. The purpose of creating this product was to assist in assessing roads to wildlife species habitat. This was only one tool used for assessing road density across the forest within the TAP. The TAP is not a decision process. The TAP provides the framework and the explanation of the forest process from which recommendations for designation are outlined that may be examined in the National Environmental Policy Act (NEPA) process. The NEPA process provides the basis, including formal public involvement, for making decisions. The result of travel analysis is a set of recommendations for changes to the transportation system which decision makers may consider before beginning the NEPA process.
02072011-06-12 03062011-34-3 03072011-21-42/63/64	The minimum road system identified in the TAP is arbitrary and capricious for there is no explanation or justification for the statement. The TAP did not specifically identify the minimum road system and needs to be completed.	The Travel Analysis Process report informed the NEPA process. The DEIS disclosed the direct, indirect, and cumulative effects of the range of alternatives developed to meet the purpose and need and the issues identified early in the analysis. The regulations at 36 CFR 212.5 ("subpart A") require that the Forest Service identify its minimum road system and unneeded roads. Section 212.51 ("subpart B") requires that we prohibit unmanaged cross-country motorized travel and designate roads, trails, and areas for motorized use. The TAP (May 2010) indicates that appendix L and summary table 4 is the minimum road system. It should be recognized that through the NEPA process, roads may be added or removed to address other issues that may arise during the NEPA process and refine the minimum road system.
03072011-21-66	We believe the actual number of miles of road that can be maintained under current and past funding should be used as an indicator of the number of miles that could be maintained given future	The forest is currently maintaining approximately 10 percent of its current open road system (table 20, page 47 DEIS). The 21 percent generated by the Southwest Regional economic assessment tool assumes full maintenance (10 percent is based on custodial maintenance) and it assumes 100 percent of the road maintenance budget is applied to road maintenance activities. Road maintenance funds are also used to pay for salary, supplies, equipment maintenance, etc., in the form of support services associated with transportation planning, road maintenance, and construction. The portion of the budget that remains to maintain NFS roads is approximately $0.56 million which the Gila uses to accomplish basic custodial maintenance on approximately 10 percent of its roads (roads specialist

Letter/ Comment #	Summary Statement	Travel Analysis Process / Minimum Road System - Response to Comments
	expected funding, which is not likely to increase. The identified minimum road system must reflect long-term funding expectations.	report, USDA Forest Service 2010a page 10). The TAP (pages 19–20); DEIS (page 48) and roads specialist report indicate the following: *Designating a road system that matches available funding levels by closing roads will not meet the access needs for public and administrative purposes. It is recognized that having a viable designated road system that matches current budget is not attainable.*

Watershed and Soils

Letter/ Comment #	Summary Statement	Watershed and Soils - Response to Comments
01142011-02-1	ATV use should be limited to areas where it does not damage or pollute streams.	The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near streams by prohibiting motorized cross-country travel except where allowed to retrieve big game and access dispersed camping sites. Unmanaged cross-country motorized travel will no longer be allowed, and this will substantially reduce potential effects to streams and other water resources on the Gila National Forest. While some roads will continue to be used and may affect streams, Forest Service management strives to minimize effects while providing needed access. In addition, the MVUM will be reviewed annually and roads and areas open for motorized use may be added or removed in the future after proper environmental analysis, which would include evaluation of resource effects on a site-specific basis.
01192011-02-13	Using closure of roads as positive for watershed health is invalid. Consideration should be given if water and sediment are drained and filtered adequately from roads. Number of times a stream is crossed is more important than whether there a stream crossing exists. Display effects related to actual times a stream is crossed by vehicle vs. sedimentation.	Please refer to the analysis and disclosure of effects in the DEIS in chapter 3. Decommissioning unauthorized routes or otherwise addressing drainage issues is not within the scope of this analysis, but could be addressed in future project planning. Furthermore, the Travel Management Rule prohibits motorized cross-country travel regardless of the current use levels on any individual national forest, and the range of alternatives in the DEIS examines the continued off-road use for MBGR and MDC. At the landscape level across the forest, there is little to no change in cumulative impacts related to the motorized route system. However, routes and uses associated with routes may have direct and indirect impacts, such as increases in sediment delivery, turbidity increases from motorized use of stream crossings, loss of riparian cover, and overwidening of channels related to motorized uses. Each of these impacts has the potential to impact water quality. These direct and indirect impacts may cumulatively impact another resource such as aquatic species, thus they must be considered and analyzed. The forest currently has no data related to actual times streams are crossed by motorized vehicles across the forest. However, because the stream crossings remain evident on the land, it can be assumed there is use. Stream crossings impact streams regardless of how many times they are crossed as sediment inputs can occur through the physical act of a tire disturbing streambanks or stream bottoms, or through the delivery of sediment down the roadbed during precipitation events.

Letter/ Comment #	Summary Statement	Watershed and Soils - Response to Comments
01192011-02-33	There are no data to justify decision based on soil productivity and protection.	The forest used a General Ecosystem Survey report for its soils analysis, specific to the Gila. This is the best available forestwide coverage of soils information to date. The soils effects as described in the DEIS is just one of the many resource conditions to be considered by the responsible official when making his or her final decision on which alternative will be implemented.
01192011-02-38	Soil productivity states there will no significant irreversible or irretrievable commitment of resources.	Comment noted. Irreversible and irretrievable commitments of resources are discussed fully in the watershed and soils specialist report, see pages 113–114 and in the DEIS on page 260.
01192011-02-42	USFS should consider excluding riparian areas and wetlands from livestock with barriers.	This suggestion is outside the scope of this project, which proposes to designate roads, trails, and areas for motorized use.
01262011-04-3	Roads cause erosion damage.	Comment noted. The watershed and soils specialist report as well as chapter 3 of the DEIS discuss these effects.
01292011-15-1	300-foot camping corridor can damage riparian areas.	The motorized use for dispersed camping will allow access to campsites, not unmanaged cross-country travel within the corridor. Effects to riparian areas are discussed in the DEIS in chapter 3, pages 88–89.
02072011-06-23	Proposal violates Forest Plan. Roads within riparian areas and with multiple stream crossings do not protect productivity and diversity. Roads adversely affect riparian dependent species. Alt G does not protect, provide and restore.	The watershed and soils specialist report contains a section titled "Consistency Review of Laws, Regulations and Policies," pages 114–121. Each alternative's compliance with the Forest Plan's direction for watershed and soil resources is evaluated in this section. All of the alternatives were found to be consistent with Forest Plan direction. In addition, chapter 3 of the DEIS discusses effects to wildlife, fish, and vegetation. The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by limiting motorized cross-country travel. This, in turn limits impacts to sensitive soils. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the soils, riparian areas, streams and wetlands have existed for decades. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and chapter 3 of the DEIS describe effects to these areas.

Letter/ Comment #	Summary Statement	Watershed and Soils - Response to Comments
02242011-02-2	Nature will not take over and erase the signs of old roads.	Comment noted. The watershed and soils specialist report makes the assumption that "Closed routes without fixed barriers are expected to revegetate minimally. These routes will not disappear from the landscape until decommissioned and will continue to be a source of sediment and erosion to some degree," page 29. No future decommissioning of roads has been proposed under any action alternative. Chapter 3 of the DEIS also documents this assumption.
03022011-15-12/13 03032011-17-2 03072011-151-5	Should not use 600-foot Riparian Risk zone in analysis, but instead use actual data from RASES, and apply Proper Functioning Condition (PFC) data where applicable.	At the time of writing of the DEIS, a forestwide riparian coverage did not exist. In 2012, the Southwestern Regional Office developed a forestwide riparian coverage (RMAP) for the Gila National Forest. The watershed and soils specialist report and the FEIS will be updated to show this, with all further riparian analyses using these data. The RMAP coverage used both RASES data and PFC data where available.
03022011-15-38	The DEIS needs to provide clear and concise discussion of direct, indirect and cumulative effects. Table 16 does not clearly distinguish direct, indirect, and cumulative effects	Comment noted. The watershed and soils specialist report and the FEIS will be clarified where necessary to discuss direct, indirect, and cumulative effects. Table 16 in the DEIS does not include a clear summary of direct, indirect and cumulative effects. This clarification will be made in the FEIS.
03032011-17-2a	Water and soils report does not analyze motorized use.	The intent of the Travel Management Rule is to develop a motorized route system for the forest, not a motorized use system for the forest. Thus, the watershed and soils specialist report analyzed routes and associated acres at relative risk for disturbance.
03032011-17-2b	Water and soils report misrepresents State of New Mexico water quality information.	The watershed and soils specialist report provides a summary of information obtained from New Mexico Environment Department (NMED) – Surface Water Quality Bureau's 2010–2012 List of Assessed Waters. This report is available at ftp://ftp.nmenv.state.nm.us/www/swqb/303d-305b/2010/USEPA-Approved303dList.pdf
03032011-17-2c 03032011-17-5 03072011-78-88	Analysis does not split out conditions from wilderness and non-wilderness areas.	The watershed and soils specialist report does not determine cause and effect relationships with impaired stream listings on the forest. Thus, an analysis was not done to correlate all land uses and activities, within and outside of wilderness, and their potential impacts on impaired streams. The analysis looked at six alternatives with variable route systems and what differences they had in potential to impact watershed and soils resources. The report did not attempt to prove that routes and

Letter/ Comment #	Summary Statement	Watershed and Soils - Response to Comments
		uses of routes had the largest impact on these resources. However, it did evaluate peer-reviewed literature to validate statements that routes and uses of routes can impact watershed and soils resources (see references in watershed and soil specialist report and chapter 3 of the DEIS).
03072011-78-65	Analysis should compare roads within and outside of wilderness to determine if this makes a difference in watershed conditions and water quality.	The analysis did not discriminate between wilderness and non-wilderness areas. This forest-level analysis looked at the relative risk of route impacts on watershed and soils resources, using science-based indicators and accepted methodologies as described in the watershed and soils section in chapter 3 of the DEIS. When evaluating direct and indirect impacts, the end result of potential acres of disturbance by routes to streams, water quality, riparian areas, etc., does not change, whether wilderness areas are included or not. When evaluating cumulative impacts, watersheds do not recognize boundaries delineated on paper. Cumulative watershed effects were analyzed to include both wilderness and non-wilderness areas.
03032011-17-2d 03032011-17-5b	Report fails to establish motorized use negatively impacts water quality.	The watershed and soils specialist report analyzed the change in potential effects from motorized routes under each alternative. The report does disclose that water quality can be negatively impacted from a motorized route system. The watershed and soils specialist report provides a summary of information found in NMED's list of Assessed Surface Waters (see ftp://ftp.nmenv.state.nm.us/www/swqb/303d-305b/2010/USEPA-Approved303dList.pdf). This report focuses on causes of impairment that may be road related. It is well documented that roads may increase sediment delivery to stream networks, which in turn can lead to associated water quality impairments. This report highlights where those occur.
03032011-17-2e 03032011-17-5c	Analysis fails to disclose the circumstances underlying watershed quality.	Comment noted. The cumulative effects analysis discusses activities across watersheds that contribute to cumulative effects. New information at the 6th-code level is currently available and will be used for analysis in the FEIS.
03032011-17-2f 03032011-17-5d	Fails to disclose how the assumptions were applied to the analysis	The watershed and soils specialist report identified assumptions and their importance on page 29 of the report and in the DEIS on page 84.
03032011-17-2g 03032011-17-5e	Methodology does not identify motorized use as a watershed threat.	Comment noted. The watershed and soils specialist report and DEIS analyzed the change in potential effects from a motorized route system under each alternative. The report and the FEIS will be clarified to remove inconsistencies between the motorized route system and motorized uses. These documents will be clarified and they disclose the effects to watershed and soil resources that

Letter/ Comment #	Summary Statement	Watershed and Soils - Response to Comments
		may be impacted by a motorized route system.
03032011-17-2h	Table 6 provides list of probable sources and are not ranked or weighted.	This information is from NMED and displays the data in the same fashion.
03032011-17-2i	Factors of highway/road/bridge runoff and surface/parking lot runoff are irrelevant to this analysis.	The watershed and soils specialist report and the DEIS document existing conditions and analyze the no action alternative B. Thus, considering factors of highway/road/bridge runoff and surface/parking lot runoff are not irrelevant as they are listed as a probable source of impairment to existing conditions.
03032011-17-2j	For the twelve reaches the report targets, there is no reach for which “off-road vehicles, highway/road/ bridge runoff, or surface/parking lot runoff” are the only probable sources.	Comment noted. The watershed and soils specialist report and the DEIS do not state that off-road vehicles, highway/road/bridge runoff, or surface/parking lot runoff are the only probable sources of impairment.
03032011-17-2k	Five of the 29 waterbodies document a probable cause of impairment as turbidity, which may be directly or indirectly linked to roads.	The watershed and soils specialist report addresses routes associated with motorized use, not just OHV activity.
03032011-17-2l	Fails to provide an accurate assessment of OHV impacts from table 9. The report fails to admit the state data does not show OHV as a major source of temperature impairment.	Comment noted. NMED does not list OHV-related activities as a probable source of all temperature impairments on the forest. The agency, however, is disclosing that road-related activities can impact stream temperatures (2012–2014 State of New Mexico Clean Water Act §303(d)/§305(b) Integrated Report–Appendix A–List of Assessed Surface Waters US EPA–Approved May 8, 2012). Where a stream on the forest is already temperature impaired, further land-disturbing activities, including motorized routes can cause continued or further impairment.
03032011-17-2m	The report invents causes and relationships not included in the state’s table.	Current literature supports that roads have the potential to generate sediment delivery to streams and alter channel configurations, which may impact water quality. The watershed and soils specialist report and chapter 3 of the DEIS disclose the effects of roads on

Letter/ Comment #	Summary Statement	Watershed and Soils - Response to Comments
		water quality, which is supported through literature and best available science. The watershed and soils specialist report and chapter 3 of the DEIS discuss the effects of roads on water quality and the potential for roads to impact water quality under each alternative. Discussion of geothermal activity and whether it is responsible for temperature-related impairments is outside the scope of this project. The State of New Mexico Surface Water Quality Bureau is the appropriate agency to make these determinations.
03032011-17-2n	The report fails to disclose that there are 2,243 miles of non-forest jurisdiction roads which contribute effects to the existing condition of water quality.	The watershed and soils specialist report analyzed all roads under its cumulative effects analysis. It did not analyze all routes, regardless of ownership, under direct and indirect effects. Under the Travel Management Rule, the forest was tasked with implementing a travel management plan for routes under forest jurisdiction and this is what the alternatives are based on. The analysis was a relative risk analysis, thus, as forest routes increase or decrease, the risk of impacts from these routes increases or decreases accordingly.
03032011-17-2o	All the data come from measurements taken on an environment affected by cross-country travel and by roads, but fails to disclose or account in the methodology.	The watershed and soils specialist report discusses impacts related to routes and impacts related to off-highway travel, indicating that current impacts are minimal. See pages 45 and 99. The report and FEIS will be further clarified to ensure that these effects are clearly stated. The watershed and soils specialist report displays potential effects to water quality as a result of routes. It is not attempting to determine why impairments to water quality are occurring. The State of New Mexico Surface Water Quality Bureau is responsible for this determination. The water quality information presented in the summary table on page 20 was extracted from the following website http://www.nmenv.state.nm.us/swqb/303d-305b/. The report does not attempt to assign importance on any one factor more than another. As this is unclear, it will be clarified in the final watershed and soils specialist report and in the FEIS. The State of New Mexico Surface Water Quality Bureau is responsible for water quality assessments and assigning probable sources of assessment. The State of New Mexico has not ranked major and minor probable sources of impairment; it lists probable sources in no particular order (NMED, personal communication, 2012). The watershed and soils specialist report will be clarified to indicate that the analysis covers direct, indirect, and cumulative impacts of routes related to motorized uses. In addition, the report will remain consistent in its verbiage related to this.
03042011-16-4	DEIS does not address ponded water sources and	Comment noted. The DEIS does not address ponded water sources, maintenance of these sources, impacts of these sources on wildlife, or numbers of these sources as this is outside the scope of the

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	their maintenance schedule. DEIS does not address ponded water impact on forest wildlife. DEIS does not address number of windmills, tanks and their maintenance schedule.	Travel Management Project.
03042011-30-5	Roads damage streams, aquatic habitat and reduce infiltration of groundwater due to soil compaction.	Comment noted. Watershed and soils specialist report (page 44) and chapter 3 of the DEIS (page 85) did address soil compaction and reduced infiltration, however, the report made no attempt to quantify changes to groundwater regeneration, as no data were available for this type of analysis.
03052011-17-3	Roads harm forest soils and streams.	Comment noted.
03052011-35-10	Cross-country travel causes point source resource degradation.	Comment noted. Effects to watershed and soil resources are discussed fully in the watershed and soils specialist report (pages 43–45) and in chapter 3 of the DEIS.
03062011-06-10	Gila River Turkey Creek dispersed camping area shows degradation but was not analyzed in watershed or fisheries reports. Adverse effects to riparian areas and wetlands from travel off of designated routes are not minimal as suggested in watershed report.	In localized areas, effects to watershed and soil resources from cross-country travel can be damaged from repeated passes. The watershed and soils specialist report concluded that across the entire forest, impacts are minimal from cross-country travel. It is acknowledged that there are isolated areas that have been impacted from cross-country or off-road use. This difference between localized impacts and forestwide impacts will be clarified in the watershed and soils specialist report and the FEIS.
03062011-34-5	Need to protect perennial and intermittent streams and the habitats they provided for TES species.	The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by prohibiting unmanaged motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the riparian areas, streams, and wetlands have existed for decades. It

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		would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report describes effects to these areas as well as chapter 3 of the DEIS.
03062011-35-2	Water is an important resource and should be protected by eliminating roads that impact rivers, streams and watersheds.	Comment noted. The action alternatives present a range of options that balances the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams, and wetlands by limiting motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the riparian areas, streams, and wetlands have existed for decades. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and chapter 3 of the DEIS describes effects to these areas.
03062011-49-4	Enforce water quality laws prior to closing roads.	Water quality was one of the criteria considered in development of the Alternative Framework, thus it was considered under each alternative. It is well documented that motorized route systems can increase sediment delivery to stream networks, which may impact water quality. However, its presence and use on the land doesn't break any particular law.
03072011-115-2	Lack of access for fuelwooding, reduced logging, and aggressive fire suppression contribute to watershed problems.	Thank you for your comment. Vegetation management and fire suppression activities are outside the scope of this project.
03072011-153-2	No Off Road Vehicles or Off Highway Vehicles in riparian, sensitive soil and key habitat areas. Armor any necessary crossings of sensitive riparian areas.	The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by limiting motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the riparian areas, streams and wetlands have existed for decades. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and chapter 3 of the DEIS describe effects to these areas. Armoring stream crossings is outside the scope of this decision.
03072011-178-2	Erosion is caused when rain aggregates from OHVs.	Comment noted. See effects to watershed and soil resources addressed in the watershed and soils specialist report and chapter 3 of the DEIS. The Travel Management Rule incorporates restrictions on cross-country travel that will alleviate much

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		of this problem as noted in chapter 3 of the DEIS.
03072011-179-1	Close most roads, in particular in riparian areas.	The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by prohibiting cross-country travel except to access dispersed camping sites, for big game retrieval, and by permitted authorization for other kinds of access in limited areas. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the riparian areas, streams and wetlands have existed for decades. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and chapter 3 of the DEIS describe effects to these areas.
03072011-21-13 to 16	Use Wildland CPR's BMPs in the planning process.	Current Forest Service policy directs compliance with required CWA permits and State regulations and requires the use of BMPs to control nonpoint source pollution to meet applicable water quality standards and other CWA requirements. (USDA Forest Service 2012, FS-9990a). This project proposes no ground disturbance; it only specifies where people are allowed to drive. BMPs will likely be incorporated into restoration decisions that will follow the decision on Travel Management.
03072011-21-28	DEIS needs further analysis of magnitude and significance of effect to soils related to big game retrieval and dispersed camping.	Currently, the forest does not have use data related to these activities. The watershed and soils specialist report and the DEIS do discuss impacts to soil resources based on single or repeated passes (page 45).
02072011-06-7 03072011-21-102	Reduce route density through reclamation, decommissioning and obliteration to restore ecological resiliency. Not decommissioning closed roads will lead to continued impacts to resources.	Reclamation, decommissioning and obliteration of routes are outside the scope of this project. The purpose of travel management is to designate a system of roads, trails, and areas open to motor vehicle use.
03072011-21-103	Forest should do more detailed analysis on specific stream related to water quality impairments. The	Alternative development occurred before watershed and soils analysis was initiated, through use of the Alternative Framework found in the Project Record. This Framework provided guidance for consideration of natural and cultural resource values under each alternative. The analysis itself did not determine which routes were left open in each alternative. The analysis results were presented to

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	Forest must establish a plan that will bring water quality back to standard in reference to sediment and temperature if roads are causing the problem.	the decision maker as one of many analyses to assist in making an informed decision. Future decisions about roads will be site-specific based on resource concerns and access needs The watershed and soils specialist report and the DEIS discuss potential effects to watershed and soil resources at the landscape level. It was not a site specific analysis used to determine which routes were open and/or closed under each alternative. It is outside the scope of the Travel Management project to bring individual stream segments into compliance with Clean Water Act.
03072011-21-104	Roads and associated activities that cause permanent impairment of soils are prohibited under NFMA.	Comment noted. The watershed and soils specialist report contains a section titled “Consistency Review of Laws, Regulations and Policies” pages 114–121. Each alternative's compliance with the Forest Plan's direction for watershed and soil resources is evaluated in this section.
03072011-21-109	The proposed route system has negative impacts to water quality. The FEIS should identify routes that are being designated on sensitive soils.	Comment noted. Effects to water quality are summarized in the watershed and soils specialist report and chapter 3 of the DEIS. Page 30 of the watershed and soils specialist report identifies the indicators used for soils, which were considered adequate for this level of analysis. Future roads decisions will be based on site-specific conditions and access needs. The watershed and soils specialist report contains a section titled “Consistency Review of Laws, Regulations and Policies,” pages 114–121. Each alternative's compliance with the Forest Plan's direction for watershed and soil resources is evaluated in this section.
03072011-21-110	Analysis is too broad and should be more site specific related to natural resource issues.	The analysis is performed at the landscape level after alternatives were developed. Site-specific input was used during alternative development using public comments, district and specialist input, and resource considerations (see Connected Disturbed Area, Travel Analysis Plan, coarse filter, stream crossing data in the project record). The analysis then compared the relative risk that each of the alternatives had on watershed and soil resources.
03072011-21-111	State specifically how water quality will be improved at site specific areas. Accurately assess and disclose the continuing impacts to watersheds under each alternative.	The intent of the Travel Management Rule is to designate a route system, while minimizing impacts to watershed and soil resources. The action alternatives present varying miles of routes that attempt to balance the need for access and resource protection to different degrees (see the Alternative Framework found in the Project Record for how natural resources were considered under each alternative). As the project is at a landscape level, the analysis reviewed the relative risk of each alternative at these varying degrees. Where there are more routes potentially impacting watershed and soil resources, the risk is higher. In alternatives with fewer routes potentially impacting watershed

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		and soil resources, the risk is lower. The analysis did not examine site specific issues, as these had been addressed to varying degrees in alternative development. See pages 85–100 in the DEIS where general direct and indirect effects are discussed for soils, riparian, water quality and watershed health. These pages also discuss that effects to these resources will vary by degree, based on the change in route miles and permitted cross country travel under each alternative. The cumulative effects analysis looks out a certain period of time, and future decisions regarding motorized roads and trails will be based on site-specific analysis of environmental effects.
03072011-21-126	Cumulative effects should analyze impacts caused by more powerful vehicles produced in the future.	The cumulative effects analysis addresses past, present, and reasonably foreseeable future actions. There are no data to support the effects of more powerful ORVs that might be invented in the future, thus the analysis did not speculate on this action. Even if there were data, cumulative effects analyses focus on land management actions. Speculation about future uses and equipment would have been inappropriate and outside the scope of this analysis.
03072011-37-5	Open roads should not follow perennial or intermittent streams as they cause negative impacts.	The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams, and wetlands by prohibiting motorized cross-country travel except for limited access for MDC, MBGR, and written authorization for some other uses. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the riparian areas, streams and wetlands have existed for decades. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and the DEIS describe effects to these areas.
03072011-53-6	ORVs cause negative impacts to riparian areas. Locate routes 300 feet away from wetlands and waterbodies.	Comment noted. The action alternatives present a range of options that balance the need for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by prohibiting motorized cross-country travel except for limited access for MDC, MBGR, and written authorization for some other uses. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads that impact the riparian areas, streams and wetlands have existed for decades. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and the DEIS describe effects to these areas.
03072011-53-6a	Water quality is degraded by vehicle use.	Comment noted. Impacts to water quality are addressed in the watershed and soils specialist report (pages 64–65) and the DEIS (pages 90–92).
03072011-69-3	Report did not adequately	Comment noted. The watershed and soils analyses were done at a landscape scale. Site-specific

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	analyze impacts to watersheds of San Francisco River, Mimbres River and Deer Creek.	analysis was not conducted for any one stream or water body. All watersheds were considered of the same ecological importance forestwide.
03072011-69-4	Revise DEIS to describe key attributes of existing routes that significantly contribute to cumulative effects on watershed and aquatic resources.	Comment noted. In 2011, the Gila National Forest completed Watershed Condition Assessment at the 6th-code scale, forestwide. This new information will be used as part of the cumulative effects analysis for the watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and the associated equivalent disturbed area method. The cumulative effects analysis completed for the watershed and soils specialist report considered all existing routes, including those of non-forest ownership. Actions dating back 25 years from 2010, present actions, and reasonably foreseeable future actions were considered in depth on all 5th-code watersheds with more than 10 percent forest ownership. These analyses were completed on 33 5th-code watersheds are included as part of the project record. New 6th-code watershed information will be used in lieu of the 5th-code watershed analysis.
03072011-69-4a	Analysis needs to provide for disclosure of cumulative effects on watershed and aquatics at the proper scale.	In 2011, the Gila National Forest completed Watershed Condition Assessment at the 6th-code scale, forestwide. Roads were a key attribute analyzed in this process. This new information will be used as part of the cumulative effects analysis for the watershed and soils specialist report and the FEIS.
03072011-69-5	Analysis needs to assess and disclose number of route crossings on all streams, including ephemeral drainages to adequately assess direct, indirect, and cumulative impacts on water quality, watershed health, aquatic ecosystems—at the 6th-code watershed scale.	Comment noted. The FEIS and watershed and soils specialist report will address impacts of a motorized route system, including crossings, on ephemeral drainages.
03072011-69-5a 03072011-69-6	Analysis needs to assess and disclose miles of routes within riparian areas and 300 feet of all streams, including	The watershed and soils specialist report and the DEIS concur that routes and crossings on ephemeral drainages can have negative impacts; routes within 300 feet of ephemeral drainages can have negative impacts; routes within 300 feet of riparian areas can have negative impacts; routes on soils with high erosion hazard can have negative impacts; routes and crossings on streams and

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	ephemeral drainages to adequately assess direct, indirect, and cumulative impacts on water quality, watershed health, aquatic ecosystems	ephemeral drainages with high erosion hazards can have negative impacts; routes on soils with high erosion hazard that are within 300 feet of streams and ephemeral drainages can have negative impacts; routes on soils with moderate and high erosion hazards that drain into aquatic habitats and impaired streams can have negative impacts; and the total route network can have cumulative effects on impaired streams and occupied fish habitats. The watershed and soils specialist report and the DEIS also concur that all roads have the potential to impact the drainage network if they are hydrologically connected to the stream system. These effects are addressed in the watershed and soils specialist report and the DEIS. At the landscape level of the project, the watershed and soils specialist report prioritized its analysis to focus on perennial, intermittent, and 303d streams as the forest is bound by law, regulation, and policy to minimize impacts to areas associated with these streams. However, the FEIS and watershed and soils specialist report will include impacts of a motorized route system, including crossings, on ephemeral drainages. At the size of this analysis, the forest prioritized areas at highest risk for critical resource loss and the relative risk associated with routes in these areas. This will be clarified in the watershed and soils specialist report and the FEIS. Using a relative risk analysis, it asserts that the more open routes remaining under an alternative, the higher the potential for sediment input into the drainage network. It also asserts the opposite, that the less open routes remaining under an alternative will have a lowered risk of sediment input into the drainage network. A discussion of these direct and indirect effects will be further elaborated on in the watershed and soils specialist report and the FEIS. As the analysis of the alternatives did not derive the selection of open and closed routes under each alternative, the relative risk analysis was considered a reasonable approach to determining potential risk of impacts to watershed and soil resources.
03072011-69-7	Loss of topsoil not adequately disclosed in DEIS.	Comment noted. The watershed and soils specialist report did not attempt to model loss of topsoil. Effects to soils were discussed at the landscape scale and can be found in the watershed and soils specialist report and the DEIS.
03072011-69-7a 03072011-69-8	Analysis needs to assess and disclose miles of routes on soils with high erosion hazards to adequately assess direct, indirect, and cumulative impacts on water quality, watershed health, aquatic ecosystems	The watershed and soils specialist report and the DEIS concur that routes and crossings on ephemeral drainages can have negative impacts; routes within 300 feet of ephemeral drainages can have negative impacts; routes within 300 feet of riparian areas can have negative impacts; routes on soils with high erosion hazard can have negative impacts; routes and crossings on streams and ephemeral drainages with high erosion hazards can have negative impacts; routes on soils with high erosion hazard that are within 300 feet of streams and ephemeral drainages can have negative impacts; routes on soils with moderate and high erosion hazards that drain into aquatic habitats and impaired streams can have negative impacts; and the total route network can have cumulative effects on impaired streams and occupied fish habitats.

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03072011-69-7b	Analysis needs to assess and disclose number of stream crossings on all streams on soils with high erosion hazards to adequately assess direct, indirect, and cumulative impacts on water quality, watershed health, aquatic ecosystems at 6th-code level.	Comment noted. The watershed and soils specialist report and the FEIS will contain a relative risk analysis of routes and potential cross-country travel on soils with moderate and high erosion hazards and unsatisfactory and unsuited soil ratings on pertinent resources at the landscape scale. This landscape level of analysis is sufficient to provide the elements needed by the decision maker, in combination with other resource and social evaluations, to make an informed decision.
03072011-69-8a	Analysis needs to assess and disclose total route network that is cumulatively afflicting impaired streams and occupied fish habitats under all alternatives. Need stream crossings on all streams, all stream crossings on high erosion soils, miles of all roads hydrologically connected to streams, or within 300 feet upslope of all streams; miles of roads on soils with high erosion hazards that are hydrologically connected to all streams or within 300 feet upslope of streams, miles of roads in areas with moderate/high erosion hazards.	Comment noted. The watershed and soils specialist report and the FEIS will be updated, using the 6th-code Watershed Condition Classification information for the cumulative effects analysis. This new information incorporates soils, roads, aquatic conditions, and other indicators found within the watershed to form a current condition rating. This current condition rating considers a culmination of past activities and impacts to the watershed.
03072011-69-8b	Analyze upstream impacts of all roads to all streams, including ephemeral.	Comment noted. The effects of motorized route systems on ephemeral drainages will be considered in the FEIS.

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03072011-69-9	Analyze how livestock grazing and logging combines with effects of forest route system and address this in cumulative effects.	The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates soils, roads, aquatic conditions and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS.
03072011-69-10	Analysis of existing condition of riparian areas is inadequate. Need to assess how they will be affected by alternatives.	Comment noted. The DEIS will incorporate the new riparian map information that was compiled in 2011 for the forest. The watershed and soils specialist report and the FEIS will contain a relative risk analysis of routes and potential cross-country travel on these riparian areas at the landscape scale. This landscape level of analysis is sufficient to provide the elements needed by the decision maker, in combination with other resource and social evaluations, to make an informed decision.
03072011-69-10a	Analysis needs to address road density within riparian areas or 300 feet of streams.	The watershed and soils specialist report did not address road density within riparian areas or 300 feet of stream. It instead calculated total acres of disturbance within riparian risk zones and within 300 feet of perennial, intermittent, and 303(d)* stream as this was deemed a suitable method to measure relative risk. The FEIS will use the new riparian map information and data on ephemeral systems as part of the final analysis. *Note: 303(d) stream is short for the list of impaired and threatened waters (stream/river segments, lakes) that the Clean Water Act requires all states to submit for EPA approval every two years on even-numbered years
03072011-69-10b	Need to assess and disclose existing condition of soils affected by all alternatives (include logging, grazing).	The General Ecosystem Survey was used for this analysis and is the best available data for existing condition of soils across the forest. The report documents erosion hazard and soil condition forestwide. These ratings were sufficient to assess relative risk of routes on soils under all alternatives. The watershed and soils specialist report provides a summary of acres of motorized routes that pose a relative risk of adverse impacts to soils, by alternative, as well as potential acres that may be impacted by motorized dispersed recreation, motorized dispersed camping areas, and motorized big game retrieval. See tables 11 to 20 pages 34–43. The watershed and soils specialist report and the DEIS address impacts to soils in relation to soil compaction, erosion, productivity and vegetative

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		ground cover. The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates soils, roads, aquatic conditions, and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions, will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS.
03072011-69-11	DEIS does not adequately address existing and combined impacts to soils in camping corridors in relation to soil compaction, degradation, erosion and productivity.	The General Ecosystem Survey was used for this analysis and is the best available data for existing condition of soils across the forest .The report documents erosion hazard and soil condition forestwide. These ratings were sufficient to assess relative risk of routes on soils under all alternatives. The watershed and soils specialist report provides a summary of acres of motorized routes that pose a relative risk of adverse impacts to soils, by alternative, as well as potential acres that may be impacted by motorized dispersed recreation, motorized dispersed camping areas, and motorized big game retrieval. See tables 11 to 20 pages 34–43. The watershed and soils specialist report and the DEIS address impacts to soils in relation to soil compaction, erosion, productivity, and vegetative ground cover.
03072011-69-12	Cumulative effects ignore livestock grazing, and is only a gross index of impacts.	The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates soils, roads, aquatic conditions, and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities, and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS.

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03072011-69-13	Cumulative effects analysis fails to disclose its limitations, and the 15 percent threshold is unsound.	The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates soils, roads, aquatic conditions, and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS.
03072011-69-14	Action alternatives violate Forest Plan for soils and riparian areas.	The watershed and soils specialist report contains a section titled "Consistency Review of Laws, Regulations and Policies," pages 114–121. Each alternative's compliance with the Forest Plan's direction for watershed and soil resources is evaluated in this section.
03072011-69-15	Analysis must disclose miles of all streams within corridor that allow off-route use (for camping and MBGR), that may impact water quality, ESA aquatic habitat.	Comment noted. The watershed and soils specialist report and the FEIS will be updated to include ephemeral streams.
03072011-69-15a	Analysis must disclose miles of all streams within corridor that allow off route use (for camping and MBGR), that are within 300 feet of ephemeral streams.	Comment noted. The watershed and soils specialist report and the FEIS will be updated to include ephemeral streams.
03072011-69-16	Density and miles of routes under all alts needs to be analyzed within 300 feet of all streams.	Comment noted. The watershed and soils specialist report and the FEIS will be updated to include ephemeral streams.

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03072011-69-16a	DEIS needs to analyze the area allowed for motorized use on routes and off-route corridors within 300 feet of streams that is on soils with moderate high erosions hazards. Disclose the miles of routes that allow use year round when route is wet.	Comment noted. Most routes under all alternatives are open year round, with the exception of a few lookouts, and closures forced by excessive snowfall. The forest does not have data pertaining to when routes are wet, as precipitation is variable in both time and space across the forest.
03072011-69-16b	Need to address past resource damage on specific motorized routes and off-route corridors under each alternatives.	The analysis is conducted at the landscape level and did not focus on site specific impacts of over 5,000 miles of roads. The relative risk analysis provides the decision maker with a broad overview of potential impacts across a 3.3-million-acre forest. Site-specific impacts were considered in development of the alternatives which occurred prior to analysis. These site-specific considerations led to the development of six alternatives, which present a range of options that balance the need for access and resource protection.
03072011-69-17	Cumulative effects did not adequately address peak and low flows, sediment delivery, turbidity and suspended sediment, water temperature, large woody debris, pools, stream shading, and the functions of riparian areas.	The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates water quality, large woody debris, soils, roads, aquatic conditions and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS.
03072011-69-18	Analysis did not address sediment delivery from routes under each alternative, in particular when routes are wet.	The watershed and soils specialist report did not attempt to quantify sediment delivery or loading. The analysis focused on the relative risk that existed under each alternative for impacts to soils and watershed resources from a motorized route system and motorized cross-country travel. The water quality section will be updated to clarify the assumption that the more motorized routes an alternative has, the more potential there is for sediment delivery.

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03072011-69-18a	Estimates of sediment delivery are necessary to assess cumulative impacts and differences among alternatives with respect to water quality, fish habitats, and fish populations.	Comment noted. Assumptions on how soils react when wet will be updated in the watershed and soils specialist report and FEIS.
03072011-69-19	DEIS does not include a credible analysis of the cumulative impacts on peak flows due to the effects of the alternatives combined with existing conditions.	See watershed and soils specialist report (page 86) The watershed and soils specialist report and the DEIS acknowledge impacts to stream temperature from varying factors. It will be updated to include further direct, indirect, and cumulative effects discussion regarding low flows, sediment delivery, turbidity and suspended sediment, large woody debris, pools. The forest did not attempt to do a peak flow or low flow analysis as there were insufficient data to support any modeled outputs.
03072011-69-20	DEIS does not adequately disclose that routes negatively impact water temperatures.	Comment noted. The water quality section of the watershed and soils specialist report discloses that routes can impact water temperature.
03072011-69-21	DEIS needs to address large woody debris in past, present, and future in relationship to motorized routes.	The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates water quality, large woody debris, soils, roads, aquatic conditions and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS. The watershed and soils specialist report did not include a discussion of large woody debris as the Gila National Forest has very few streams that are influenced by large woody debris, with the exception of those at the highest elevations. The report will be updated to include this in the assumptions.

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03072011-69-22	DEIS does not adequate address impact to water quality, including turbidity and suspended sediment, and temperature.	The cumulative effects analysis for the FEIS will use the 2011 Watershed Condition Classification. This recent assessment at the 6th-code watershed scale incorporates key indicators that provide a representation of current watershed condition. This new information incorporates water quality, large woody debris, soils, roads, aquatic conditions and other indicators found within the watershed to form a current condition rating. Inclusive in this condition classification is recognition that the effects of management activities and watershed events in the past have led to current watershed condition. (Assumptions in the DEIS and the watershed and soils specialist report will be updated to reflect this.) This new information, as well as reasonably foreseeable actions will be used as part of the cumulative effects analysis for the final watershed and soils specialist report and the FEIS, in lieu of the 5th-code watershed information and associated equivalent disturbed area method used in the DEIS.
03072011-69-24	DEIS does not adequately address irreversible and irretrievable impacts	Irreversible and irretrievable commitments of resource are discussed fully in the watershed and soils specialist report, see pages 113–114. This discussion will be included in the FEIS.
03072011-78-56	Older roads are more stable than new roads.	Road conditions are variable across the forest landscape. Conditions can be influenced by maintenance, geology, use levels, topography, etc., without consideration as to how long the road has existed. This analysis considers the effects that routes and motorized uses of these routes have to watershed and soil resources across the landscape, relative to the landscape where roads do not exist. Roads create hydrologic alterations that would not be occurring if the route(s) was not present.
03072011-78-63	Agency did not use its own tools and data and ignored fire in its analysis.	Please refer to the cumulative effects analysis in the DEIS, which considers a multitude of watershed indicators. The existing condition serves as a proxy for effects of past actions. Unless the past activities are relevant for a meaningful cumulative effects discussion, there is no need to discuss individual past actions and their effects (CEQ 2005). The Watershed Condition Classification (2011) which will be used for the FEIS considers many watershed attributes (including vegetation conditions that may lead to wildfire activity). Future fires are considered too speculative to include, although reasonably foreseeable future prescribed fire is certainly relevant. The DEIS is a summary document for the full analysis which is contained in the specialists reports, so not every detail of the analysis is in the DEIS. However, the project record is available for public inspection upon request which will include additional information such as fire history.

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03072011-78-56a 03072011-78-65a	Analysis should use fire history, fire disturbance, and related disturbance regimes as addressed in the TAP.	Comment noted. The 2011 Watershed Condition Classification for the Gila National Forest will be used as part of the cumulative effects analysis for the FEIS. This classification considers soils, erosion, fire regimes, and other attributes as part of its final assessment.
03072011-78-84	Analysis did not consider actual acres of roads across forest and the footprint this makes over all Gila NF acres.	A large part of the estimated beneficial effects comes from the prohibition of motorized cross-country travel; the analysis is not just based on miles or acres of roads. Potential acres of disturbance were considered in the direct and indirect effects analysis. In the cumulative effects analysis, the actual acres of disturbance were calculated for activities, including the actual acres of disturbance for the footprint of the road. This information is included in the watershed and soils specialist report and will be covered in the FEIS.
03072011-78-84a	Claims are overstated that the effects of changes to the route system on the land will result in an improvement.	A large part of the estimated beneficial effects comes from the prohibition of motorized cross-country travel; the analysis is not just based on miles or acres of roads.
03072011-78-86	Analysis is in conflict with Bear Creek Watershed study done by NMED.	The Bear Creek 5th-code watershed is listed in unsatisfactory condition for watershed conditions overall. This condition rating was done as part of the Gila National Forest Plan (1986) using an analysis that considered multiple factors in the watershed. It does not focus specifically on water quality in Bear Creek, but on multiple drainages and contributing factors and activities occurring within the watershed boundary. The Bear Creek Water Quality Survey Summary was specific to water quality. The Summary states the following in its discussion: “While an assessment cannot be performed on the basis of a single data point, no exceedences of applicable criteria were found in these analyses. This survey found no exceedences of any numeric criterion that led to a finding of non-support of a designated use.” The State water quality survey did not replace the Forest Service watershed condition rating.
03072011-78-87	The effects to watershed are vague and overstated.	The watershed and soils specialist report and the FEIS will be updated to provide current literature and science that support the conclusions.
03072011-78-88a	Conduct analysis that connects factual information with conclusion.	Site-specific impacts were considered in developing the alternatives, which occurred prior to analysis. These site-specific considerations led to the development of six alternatives, which present a range of reasonable alternatives. The watershed and soils analysis was done following development of the alternatives and did not drive selection of open and closed routes, but rather provided a relative risk

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		analysis of routes by alternative. The watershed and soils specialist report and the DEIS examine direct, indirect, and cumulative impacts. At the landscape level across the forest, there is little to no change in cumulative impacts related to routes and their use. However, routes and uses associated with routes may have direct and indirect impacts, such as increases in sediment delivery, turbidity increases from motorized use of stream crossings, loss of riparian cover, and overwidening of channels related to motorized uses. These direct and indirect impacts may cumulatively impact another resource such as aquatic species, thus they must be considered and analyzed.

Wildlife

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01082011-05-1 01082011-06-1/3	Protect wildlife by reducing road mileages and decommission those roads. New roads should not be added.	As part of the route designation process, the Travel Management Rule (36 CFR Part 212) requires consideration of the availability of resources for the maintenance and administration of the designated routes (36 CFR §212.55).” The Forest analyzed a range of alternatives which varied in miles of routes and the amount of dispersed camping associated with motorized vehicle use and resource/wildlife protection (pages 126 to 212 DEIS). Therefore, some alternatives provided more wildlife protection and others more recreational opportunities. Also, constructing roads and decommissioning roads is outside the scope of this analysis.
01192011-02-21	No determination has been made concerning roads, only assumptions.	The DEIS documents the development of a range of alternatives to the proposed action as they respond to the issues and address the purpose and need. The DEIS also discloses the direct, indirect, and cumulative effects of each alternative on this species. An overview of the Analysis Process used for all terrestrial species is documented on pages 134 to 137 of the DEIS. The analysis of direct and indirect effects to this species by alternative and a determination by alternative is documented on pages of 157 to 165 of the DEIS. Cumulative effects are documented on pages 207 to 212. No new roads are proposed in the alternative actions analyzed in the DEIS; however, unauthorized routes would be added to the system under alternatives C, D, E, F, and G, and decommissioned roads would be opened to motorized use (see DEIS table 5). The primary objective of this project is the management of a motorized road and trail system and prohibition of unlimited off-road (cross-country) use.
01192011-02-23	The effects analysis on the southwestern willow flycatcher basically shows there are no differences between the action alternatives and the no action.	The DEIS discloses the direct, indirect, and cumulative effects of each alternative on the southwestern willow flycatcher (pages 180 to 190, and pages 207 to 212). All action alternatives change 0.7 mile of road to administrative route, eliminate cross-country travel, and don’t allow any camping along this route; therefore, reducing the effects to a lower level than the no action alternative (draft wildlife specialist report, table 70, page 100).
01192011-02-24	Analysis for ungulates is invalid. Populations of big game are regulated by the New Mexico Game and Fish	Pronghorn, bighorn sheep, and other wild ungulates findings were made for each action alternative for changes from the existing condition (alternative B), not just for motorized areas (pages 138 to 144 in the DEIS).

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	Department and it is their responsibility to regulate and not the Forest Service. Using road density as a factor is irrelevant to the Travel Management Plan in justifying road density as a contributing factor in reducing big game populations.	New Mexico Department of Game and Fish does regulate big game. The wildlife report analyzed the potential effects from each action alternative relative to the change from alternative B; it did not advocate any certain population level. It is well documented in the literature that the higher the road density, the greater the effect on wild ungulates. Road density was used as an indicator to evaluate potential effects to wild ungulates from the different alternatives, again relative to the change from alternative B, not to provide a justification for any certain road density.
01192011-02-25	There is no data to support the summary of findings and determination in the wildlife specialist report for mountain lions and black bears	Pages 144 to 150 of the DEIS document the analysis and findings for these species and other wide ranging carnivores; including the literature used to develop this analysis. The wildlife section of the DEIS is a summary of the draft wildlife specialist report, this report on pages 31 to 41 has the complete analysis for these species and note all the literature sources that were used to complete this analysis. The best available information (literature) is clear that roads have the potential to cause direct and indirect effects to mountain lions, bears, and other wide ranging carnivores.
01192011-02-26	There is no data to support the summary of findings and determination in the wildlife specialist report for amphibians and reptiles.	Pages 157 to 165 of the DEIS document the analysis and findings for these species; including the literature used to develop this analysis. The wildlife section of the DEIS is a summary of the draft wildlife specialist report, this report on pages 56 to 68 has the complete analysis for these species and note all the literature sources that were used to complete this analysis. The best available information (literature) is clear that roads have the potential to cause direct and indirect effects to reptiles and amphibians. A may affect or a may impact finding are determinations that are defined in the Endangered Species Act Section 7 consultation process and in Forest Service policy direction for sensitive species. All action alternatives are removing cross-country travel and the overall amount of motorized use on the Gila NF; therefore, the potential to affect the viability of a species, likelihood of a species to continue to exist on the forest, is typically reduced. This is not to say that individuals can’t be affected.

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01192011-02-27	There is no data to support the summary of findings and determination in the wildlife specialist report for Avian Fauna.	Pages 165 to 202 of the DEIS document the analysis and findings for these species; including the literature used to develop this analysis. The wildlife section of the DEIS is a summary of the draft wildlife specialist report; this report (on pages 68 to 127) has the complete analysis for this group of species and notes all the literature sources that were used to complete this analysis. The best available information (literature) is clear that roads have the potential to cause direct and indirect effects to this group of species. Again, a may affect or a may impact finding are determinations that are defined in the Endangered Species Act Section 7 consultation process and in Forest Service policy direction for sensitive species. All action alternatives are removing cross-country travel and the overall amount of motorized use on the Gila NF; therefore, the potential to affect the viability of a species, likelihood of a species to continue to exist on the forest, is typically reduced. This is not to say that individuals can't be affected.
01192011-02-28	There is no data to support the summary of findings and determination in the wildlife specialist report for insects.	Pages 201 to 207 of the DEIS document the analysis and findings for these species; including the literature used to develop this analysis. The wildlife section of the DEIS is a summary of the draft wildlife specialist report; this report on pages 127 to 136 has the complete analysis for this group of species and notes all the literature sources used to complete this analysis. The best available information (literature) is clear that roads have the potential to cause direct and indirect effects to reptiles and amphibians. A may affect or a may impact finding are determinations that are defined in the Endangered Species Act Section 7 consultation process and in Forest Service policy direction for sensitive species. All action alternatives are removing cross-country travel and the overall amount of motorized use on the Gila NF; therefore, the potential to affect the viability of a species, likelihood of a species to continue to exist on the forest, is typically reduced. This is not to say that individuals can't be affected.
01192011-02-29	No current data exists concerning effects on wildlife by roads and trails in the forest upon which to make decisions to close roads.	The wildlife section of the DEIS discloses the direct, indirect, and cumulative effects of each alternative to terrestrial species. An overview of the analysis process used for all terrestrial species is documented on pages 134 to 137 of the DEIS. The analysis of direct and indirect effects to terrestrial species by alternative and a determination by alternative is documented on pages of 126 to 207 of the DEIS. Cumulative effects are documented on pages 207 to 212. The wildlife specialist report did not make any decisions related to closing roads.
01072011-07-2 01072011-09-1 01072011-12-1	Protect resources, including aquatic and wildlife species and habitat, water, etc. from	Thank you for your comment. The action alternatives present a range of options for access and resource protection. All reduce the places where people could drive in and near riparian areas, rivers, streams and wetlands by limiting

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01072011-13-1 01072011-14-1 01082011-01-1 01082011-03-1 01082011-35-9 01082011-38-9 01102011-02-1 01102011-04-1 01102011-09-9 01112011-01-1 01142011-05-9 01152011-24-5 01152011-34-1 01172011-03-9 03032011-10-1 03052011-08-1 03052011-26-3 03062011-36-2 03072011-08-1 03072011-53-4/13 03072011-56-1 03072011-59-2a 03072011-70-2 03072011-80-3 03072011-95-2 03072011-112-1 03072011-168-2 03072011-196-1 03072011-209-1 03072011-211-1 03072011-224-4 03072011-226-3	off-road vehicles and by reducing miles of roads.	motorized cross-country travel. Though allowing motorized use near these resources may not be desirable, in some situations it is unavoidable. Many main arterial forest roads have existed for decades that impact the riparian areas, streams and wetlands. It would be impossible to eliminate traffic on all of these routes. The watershed and soils specialist report and the watershed and wildlife analysis in Chapter 3 of the DEIS describe effects to these areas.
02072011-06-20	A call of may affect likely to adversely affect (MALAA) 4 of 5 federally listed species	A MALAA determination is an Endangered Species Act Section 7 determination that is required when an action has the potential to cause harm or harassment to even a single individual. This determination is required even if the overall action is benefitting the species as a whole. In reference

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	is clear evidence that the Gila NF is not adequately managing roads to protect species. This goes against the Forest Plan and shows valid reasons why more protective alternatives need to be added to the DEIS for analysis.	to this analysis, there are several alternatives that benefit each federally listed species, but there is still the potential to affect individuals; therefore, a determination of MALAA was warranted. Most action alternatives are in compliance with the standard and guideline identified in the Forest Plan for federally listed species.
02152011-02-2	Wildlife will continue to make it or not in spite of us. Mother nature will take care of that. Red Tail Hawks have been pointed out to me nesting in the traffic lights while driving in down town Phoenix.	As noted in the draft wildlife specialist report, none of the action alternatives will cause a trend toward Federal listing or affect the viability of a species (pages 126 to 207 DEIS). As noted in the wildlife report: “The literature suggests that raptors are unlikely to be disturbed by routine use of roads, homes, and other facilities where such use pre-dates the species’ successful nesting activity in a given area. Therefore, in some cases, ongoing existing uses may proceed with the same intensity with little risk of disturbing birds of prey (USFWS 2007)” (page 166 of DEIS). For example, if a two-track road typically gets one vehicle traveling on it per day, and a pair of raptors choose to nest adjacent to this road, this individual will typically tolerate this same level of use. But, if for some reason you get 10 vehicles or a group of ATVs traveling on the road, particularly if it is early in the nesting season, the potential for these raptors to abandon the nest increases.
03022011-15-7	The DEIS does not disclose the current condition or effects of the no action alternative.	Each focal species and focal group has a write-up that describes what is known about the species and its habitat on the forest. We acknowledge that for some species, the information is limited (pages 138 to 203 DEIS). The wildlife section of the DEIS is a summary of the draft wildlife specialist report; this report on pages 19 to 136 has a more complete species and habitat write-up. All federally listed species and Forest Service sensitive species that occur on the Gila are included as a focal species.
03022011-15-18b	The DEIS solely relies on broad generalizations in cited literature for its claim that “roads are bad for wildlife,”	The wildlife section of the DEIS cites many authors that identify potential road/motorized use effects to wildlife species. The specialist report even states that: “Not all species are negatively impacted by motorized use (page 134 DEIS).” Wisdom et al. (2000) did a good job of condensing and summarizing potential road effects; and therefore, was used to summarize potential direct and indirect effects for this analysis. Wisdom research was not the only literature cited related to potential effects to wildlife from motorized recreational use. Each focal group and focal species has literature that refers to the potential effects of motorized recreation on wildlife (pages 134 to 207 DEIS). An extensive amount of time was spent reviewing the most up-to-date literature to use the

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		best available science for the DEIS. This literature also included research completed in New Mexico and in similar habitat types that occur on the Gila National Forest. We disagree with the author of this letter and feel the analysis was relevant. An example of local information used comes from the USFW 2010 document that is cited and documents that: of the 68 Mexican Gray Wolf deaths on or adjacent to the Gila and Apache-Sitgreaves National Forests between 1998 and 2009, 31 are associated with shooting and 12 with vehicle collision (page 210 DEIS). These data also show proximity to roads causes direct and indirect effects to terrestrial wildlife from motorized recreation.
03022011-15-19	DEIS contains no cumulative effects analysis for wildlife. Agency tries to pass off a watershed cumulative effects analysis as a suitable proxy for the required wildlife cumulative effects analysis.	The wildlife cumulative effects analysis starts by stating that the wildlife analysis reviewed the list of past, present, and reasonably foresee able projects within each 5th-code watershed on the forest, assembled by the watershed assessment (page 207 DEIS). Then the analysis looked at the percent of disturbance identified in each 5th-code watershed by the watershed cumulative effects analysis. The commenter is questioning the cause and effect relationship between disturbance and wildlife habitat. The amount of disturbance in an area is an indicator to the amount of potential species disturbance and habitat disturbance. The disturbance to soil: say the compaction of soil, affects the ability of vegetation to get established, or may cause the trampling of vegetation. Affecting the growth and structure of vegetation affects hiding cover, thermal cover, movement corridors, and foraging habitat for wildlife. The loss of soil, erosion also affects the ability of an area to grow vegetation. The FEIS will expand on this cause and effect discussion to help clarify how these different activities cause direct and indirect effects. A review of all past, present, and reasonably foreseeable activities along with a review of how much disturbance this activity is causing to habitat parameters or parameters that affect habitat conditions is a good indicator to potential adverse cumulative effects to terrestrial wildlife species.
03022011-15-25	DEIS repeatedly ascribes all impacts to the natural environment to motorized use, ignoring the impacts from all other forms of use on the forest.	Analyzing the effects of all forest uses is outside the scope of this analysis. Additional actions are considered in the cumulative effects analysis as required. The cumulative effects analysis in the DEIS discloses the impact on the environment which results from the incremental impact of the action when added to [the effects of] other past, present, or reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions (pages 207 to 212 DEIS). Noted that it is Knight and not Knights. Both Knight 1991 and 1995 were used, and only the appropriate sections of these studies were used.

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03022011-15-27	DEIS equates the existence of the roads with the use of the roads in its analysis of the Environmental Consequences.	Miles of road were used as an indicator of potential effects, since we did not have any reliable use information on our roads. Pages 134 and 136 of the DEIS discuss how traffic affects wildlife and how miles of road were used as an indicator of potential effects. Table 84 on page 164 of the DEIS provides an example of a discussion on how reduced traffic would benefit the Chiricahua leopard frog. The wildlife report acknowledges that the higher the level of use on a road, the greater potential to affect a species. Current traffic count data does not exist. Under alternatives that lower the miles of roads on the forest you could increase use on some roads, but you would also increase amount of area on the forest away from any type of road exposure effects. You could have higher traffic, but more area on the forest would be located farther away, not directly adjacent to this traffic. Where you have sensitive resources like the Chiricahua leopard frog, all action alternatives reduce the miles of road adjacent to occupied habitat, reduce the number of stream crossings in occupied habitat, and change roads to administrative use only (roads not open to the public, therefore, reducing use levels). Table 83 on page 163 of the DEIS provides data that exhibit the example provided for the Chiricahua leopard frog in the previous sentence.
03022011-15-29	Agency has failed to disclose or analyze the current source of all recreation use impact on wildlife.	The evaluation of all recreation across the entire forest is beyond the scope of this analysis. The cumulative effects section of the wildlife analysis in the DEIS does identify that recreation activities other than just motorized recreation were part of the analysis (page 207 DEIS).
03042011-16-2	Extreme drought impacts to species are not discussed in depth.	The effects of drought are outside the scope of the analysis.
03062011-04-16	Draft fails to relate the problem to either road density or road spacing. Wisdom, et al) indicates that the interval between roads is a more important measure of vehicle-related disturbance of wildlife, particularly ungulates.	The cumulative effects analysis in the DEIS report addressed road density problem areas (page 207 to 211), and had a section that looked at ungulates in particular (page 210).

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03072011-18-6	Species like the Sonoran river otter, jaguar, and grizzly bears need to be included in the DEIS.	These species are extirpated from the forest. Analyzing potential effects to these species is outside the scope of this analysis since they do not occur on the forest and the implementation of this project would not affect this group of species (page 129 DEIS).
03072011-18-6a	Species listed as sensitive for the area were not included in the DEIS as shown in appendix A of comment letter.	The wildlife analysis took a focal species approach that analyzes the potential effects to groups of species (threatened and endangered, sensitive, and management indicator) that have similar habitat requirements (page 136 DEIS). Focal species are species that are used to represent a group of species because they have similar habitat requirements and are sensitive to a particular activity. Using the focal species approach allows the Gila to use motorized-associated literature related to different focal groups to help evaluate the potential effects of motorized use to similar species in the group. Since the species identified by the commenter have similar habitat requirements as the focal species identified in the analysis, the wildlife report did consider potential effects to these species. The list of species will be reviewed for the final documents.
03072011-18-6b	The rationale for dropping mountain plover and least tern is not accurate.	These species have not been documented on the forest, so the rationale in the DEIS is correct (page 129 DEIS).
03072011-18-6c	Spotted bat, blue grouse, hairy woodpecker not mentioned in document.	These species are mentioned in the DEIS. Spotted bat, table 50; blue grouse, table 133; and hairy woodpecker, tables 101 to 104.
03072011-18-6d	Ignoring the location of roads in regards to effects to cliff-dwelling bats. These roads may affect roosting bats.	The forest has no data that identifies or supports this claim. We used the best available data to analyze effects to all species including bats (pages 129, 130, and 150 to 156 DEIS).
03072011-18-9	The analysis did not indicate which alternative posed the least impact to small mammals, herpetofauna, and the different focal groups of birds.	For each focal group (small mammals, herpetofauna, and birds) there is a series of tables and discussion prior to each summary table that discusses the relative change for each focal group from each alternative (pages 140 to 205 DEIS). The complete wildlife report provides (not just the summary provided in the DEIS) has tables that provide a more thorough breakdown of effects in the series of tables that precede the summary tables for each focal group.

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03072011-18-13	Rare habitat types including springs, natural ponds, caves, old-growth, mesic talus slopes, sparsely vegetated, and high alpine habitats not adequately addressed in DEIS.	The forest's data for many of these rare habitat types are incomplete and do not allow for a direct analysis between the different alternatives. Without knowing where on the landscape most of these habitat types occur you cannot determine the existing road conditions associated with these habitats and then the change that would occur under the different alternatives. We do have more species location information; therefore, the wildlife analysis took a focal species and their associated habitat needs approach, that analyzes the potential effects to rare wildlife species and their associated habitat (threatened and endangered, sensitive, and management indicator) (page 136, DEIS). The final wildlife specialist report and EIS will add additional explanation. Rare/sensitive species are associated with rare habitats; therefore, our analysis in an indirect way did consider potential effects to many of the habitats you have identified. Examples of how an analysis for these species would act as an indicator to these habitats is: Mexican spotted owls are known to nest in mixed conifer vegetation with old-growth type habitat characteristics and in caves (pages 166 to 177 DEIS and page 70 of the draft wildlife specialist report). Peregrine falcons use cliff-type habitats where caves are associated (pages 166 to 177 DEIS and page 72 of the draft wildlife specialist report). Goshawks are known to nest in ponderosa pine vegetation with old-growth type habitat characteristics (pages 166 to 177 DEIS and page 71 and 72 of the draft wildlife specialist report). Blue grouse were used as a focal species to consider potential effects to species associated with high-elevation spruce-fir vegetation (pages 197 to 201 DEIS and page122 and 123 of the draft wildlife specialist report). The DEIS also covers red-backed vole that uses talus slopes, Arizona Montane vole that uses grassy alpine areas, Mexican gartersnake that uses marshes and springs, and the Nitocris fritillary that uses seeps and springs (pages 134 to 207 DEIS and draft wildlife specialist report).
03072011-18-22	Commenter found minor edits needed to text…"Bufo" has changed to Anaxyrus; "Rana" has changed to Lithobates; and incorrectly grouping burrowing owl, white-eared hummingbird, and Costa's hummingbird as songbirds.	Thank you for identifying these edits. This will be corrected in the final documents.
03072011-19-3	Seasonal closures seem more reasonable if wildlife breeding is the problem.	A reasonable range of alternatives was considered to address access and wildlife habitat concerns. Table 6 on page 25 of the DEIS identifies roads proposed for seasonal closure by alternative. Roads and motorized recreation not only cause indirect effects to breeding, they also cause other direct and indirect effects as noted on page 134 to 135 of the DEIS; therefore, seasonal closures do not

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		address all effects to wildlife or aquatic species.
03072011-21-83	DEIS underestimates wildlife impacts, because didn't consider motorized trails.	Motorized trails and motorized roads by alternative were considered in the analysis. Table 66 on page 148 of the DEIS provides an example of this analysis. Each focal species group has a table that looks at roads and trail changes by alternative (pages 140 to 205 DEIS).
03072011-21-105	Roads are a major cause to habitat fragmentation and are a serious threat to native biodiversity and ecosystem resiliency. Of particular concern are desert bighorn sheep, American beaver, and leopard frogs including the Chiricahua, northern and lowland subspecies.	The draft wildlife specialist report recognized that roads contributed to habitat fragmentation which can cause direct and indirect effects to wildlife (page 134 to 135 DEIS). The identification of potential direct and indirect effects to wildlife was a consideration in the development of the range of alternatives. The species you have identified as species of particular concern were evaluated as a focal species or in a focal group and the relative risk by alternative was included in the analysis (pages 138 to 144 DEIS).
03072011-21-115/116/ 117/118/119/120	Impacts of noise to wildlife are not adequately addressed.	The draft wildlife specialist report considers potential noise effects in the analysis process section in the category that states: "Disturbance, Displacement, Avoidance, Harassment (i.e., chronic negative interactions with humans) – Roads can directly interfere with life functions at specific use sites (e.g., increased disturbance of nest sites, breeding leks, or communal roost sites). This can result in spatial shifts of individuals and populations away from a road in relation to human activities on or near a road (page 135 DEIS)." This was part of the rationale for using disturbance as an indicator for most of the focal groups analyzed (page 136 DEIS). This will be further clarified in final wildlife specialist report.
03072011-21-138	The Gila National Forest should consider how motorized routes would allow access to caves and facilitate the spread of white nose syndrome to bats in the Gila National Forest.	The Gila National Forest has no known major winter bat roost's cave locations; and these are the areas of highest concern for the spread of white nose syndrome. No white nose syndrome has been documented in the state of New Mexico. Page 130 of the DEIS documents that the implementation of this project will have no impact to three of the sensitive bat species that occur on the Gila. Table 73 on page 154 of the DEIS documents that four of the five action alternatives reduce the level of motorized road and trails in western red bat habitat.
03072011-37-4	Since roads create habitat loss and can potentially	The alternatives analyzed in detail provide a range of motorized access on roads, trails, areas, and also managed access for dispersed camping and big game retrieval. Because unmanaged cross-

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	cause the extirpation of a species, why is such a large percentage of roads proposed to remain open.	country travel is prohibited by the Travel Management Rule, all alternatives reduce the potential effects to wildlife.
03072011-53-8	Concerned with routes located in areas with sensitive, threatened, or endangered plant species or critical habitat.	Alternative E provides the most protection to resources and species by reducing open road miles by approximately 50 percent and not proposing areas or corridors for motorized uses. Alternatives D, F, and G provide varying levels of protection for resources and species, but not to the level of alternative E.
03072011-78-90	Draft wildlife specialist report makes a serious error and causes the analysis to produce false outcomes. The analysis represents the effects of all routes as the same. Yet none of the literature cited does this. One researcher, Gaines, went to great lengths to show the distinction between roads and trails. Gaines observed that there are very distinct and unequivocal differences between roads and trails.	The wildlife section of the DEIS completed an extensive amount of literature review and used the best available literature that we could locate to determine the effects of full-sized vehicles versus ORVs. The ungulate analysis in the draft wildlife specialist report (table 10, page 20) reports these differences and the different disturbance factors used for elk and deer. Additionally, when different disturbance distances existed in the literature, the Gila typically used the middle distance as the potential disturbance zone to account for the other factors identified in the literature and in the specialist report (like: traffic rates, cover adjacent to roads, topography, and type of road). Unfortunately, for many of the focal species and groups, the only available literature was research on full-sized vehicles and their disturbance distances, so this is the information that was used. Literature does exist that identifies direct and indirect effects of ORVs, but very few studies discuss distances of disturbance for many groups of wildlife.
03072011-78-90a	Knight and Cole did not study motorized recreation. Their research on trails only covers nonmotorized activities.	Disagree – the development of Knight and Cole's model that groups recreation impacts included Vehicle and ORV activities (page 58 of Wildlife and Recreationist "Coexisting Through Management and Research, Chapter 4 by Knight and Cole: discusses how Vehicle and ORV recreation affect wildlife).
03072011-78-90b	The entire discussion is predicated on "potential,"	The word potential is used because an effect does not always manifest itself or manifest itself in a way that is observable to us. For example, in some cases when an ATV passes by an elk the

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	routes that have been in place for decades have already manifested their potential.	individual does not always move away. Wisdom et al. (2004) documented that at approximately 109 yards the flight probability was 62 percent; therefore, at this distance there is an approximate 38 percent chance that the elk will not move away.
03072011-78-90c	The improbable nature of the “potential” suddenly manifesting itself now, and not anytime in the past decades, is not even discussed.	The direct, indirect, and cumulative effects of the alternatives are disclosed in the DEIS (pages 120 to 212). Alternative B the no action alternative discusses the effects that have the potential to occur under the existing condition, both currently and in the recent past.
03072011-78-91	DEIS acts as though it will, in complete disregard of the fact that the roads and trails have already manifested this “risk,” and it is not significant enough to endanger any MIS.	The risk to most species of wildlife is reduced with the removal of routes and cross-country travel. The direct, indirect, and cumulative effects of the alternatives on MIS are disclosed in the DEIS (pages 138 to 201). This is first displayed in the ungulate section of the DEIS for the mule deer where the analysis shows that alternative C is has the potential to have higher direct and indirect effects from motorized routes/roads and trails then alternatives B, D, E, F, and G; because this alternative increases this type of use in key mule deer habitat (DEIS table 60, page 143). The analysis to other MIS species continues in the DEIS to page 201 where the analysis for the Mearn’s quail is completed. The determination table for each MIS species in the DEIS does document that all action alternatives can effect individuals, but would not cause a negative population trend or a trend toward Federal listing (pages 144 to 201). The DEIS does not elevate the wildlife value over the multiple-use values; it evaluates the potential direct, indirect, and cumulative effects to wildlife under the different alternatives (pages 126 to 212).
03072011-89-2	Temporary road closures already in place in important resource protection areas.	If we are denying access by closing a motorized route/road or trail, we are doing it to address an issue and the purpose and need (DEIS pages 4, 5, 9, and 10).
03072011-98-8	Threatened, endangered, and sensitive species areas should be off limits to ORVs.	Alternatives were developed through an interdisciplinary process, where various forest personnel and biologists compared TES location and habitat data to the existing road system and considered which fit the parameters of each alternative (alternative framework). This helped develop a range of alternatives which varied in miles of routes and the amount of dispersed camping associated with motorized vehicle use and resource protection. Alternative E provides the most wildlife protection (DEIS table 16 page 40). Alternative E reduces OHV trails in most sensitive species habitat and eliminates these trails within the Chiricahua leopard frog-occupied habitat, southwestern willow

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		flycatcher-occupied areas and critical habitat, Mexican spotted owl protected activity centers, Mexican spotted owl critical habitat, and reduces it in Mexican gray wolf habitat (Analysis Area Tables, draft wildlife specialist report).

Chiricahua Leopard Frog

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01072011-01-7 01072011-08-6 01072011-21-6 01072011-22-5 01072011-25 to 96-7 01082011-04-6 01082011-07 to 64-7 01092011-05 to 23-7 01102011-09 to 23-7 01112011-02-6 01122011-01-6 01122011-04-3 01122011-06 to 19-7 01132011-08-7 01132011-15 to 23-7 01142011-04 to 09-7 01162011-01 to 05-7 01172011-02-6 01172011-03-7 01172011-04-7 01182011-10-7 01182011-11-7 01202011-04-7 01202011-05-7 01252011-03-7 01262011-05-5 01282011-03-7 01312011-02-7 01312011-03-7 02022011-03-7 02032011-05-7 02032011-06-7 02112011-003-7	Only alternative E significantly reduces the number of roads in Chiricahua leopard frog habitat.	The forest analyzed a range of alternatives that varied in miles of routes allowing motorized vehicle use and resource protection. Because the Travel Management Rule prohibits unmanaged cross-country travel, all action alternatives reduce the level of potential effects to this species.

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02112011-004-7 02142011-(002 to 016)-7 02152011-(003 to 006)-7 02162011-(007 to 013)-7 02172011-(002 to 004)-7 0220201-003-7 03072011-77-4		
01192011-03-1	Chiricahua leopard frog is threatened with disease, drought, and grazing and the Forest Service should do more to help this frog survive by keeping as many roads closed as possible and eliminating dispersed camping corridors.	The forest analyzed a range of alternatives that varied in miles of routes and the amount of dispersed camping associated with motorized vehicle use and resource protection. As noted on page 163 of the DEIS in table 83, all action alternatives provided more Chiricahua leopard frog protection then the no action alternative (alternative B). Additionally, this table also shows that alternative E completely eliminates motorized dispersed camping within the analysis area considered for this species. All action alternatives reduce the level of potential effects to this species.
03032011-17-10	Chiricahua leopard frog analysis: The analysis is on the roads themselves and never addresses use.	An overview of the analysis process used for all terrestrial species is documented on pages 134 to 137 of the DEIS. This section discusses how motorized travel affects wildlife species. On pages 157 to 165, the DEIS completes an analysis of direct and indirect effects to amphibians and the Chiricahua leopard frog by alternative and a determination by alternative is documented in this same section of the DEIS. This analysis discusses how the miles of routes (motorized roads and trails) would be used as one indicator to where this use occurs and would have the potential to affect the Chiricahua leopard frog. On pages 134 and 136, the DEIS discusses how traffic affects wildlife and how miles of road were used as an indicator of potential effects. Additionally, page 164 (table 84) of the DEIS discusses how reduced traffic would benefit this species. The wildlife report acknowledges that the higher the level of use on a road, the greater potential to affect a species. Current traffic count data does not exist.
03032011-17-10a	Chiricahua leopard frog analysis misapplies the dispersal area. It uses dispersal, but for the wrong purpose. The Recovery Plan did not design the dispersal area as	The Forest used a U.S. Fish and Wildlife Service (USFWS) document cited as “Southwest Endangered Species Act Team (2008)” and named “Chiricahua Leopard Frog Considerations For Making Effects Determinations And Recommendations For Reducing And Avoiding Adverse Effects” (CMED) as a reference to the methodology applied; as discussed on page 159 of the DEIS. The introduction section of this document states: “The CMED provides considerations in

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	a “road exclusion zone.” The Recovery Plan never advises closing roads, or using the dispersion area to identify roads for closure.	determining if the species may be in the action area of the proposed activity and, if so, possible ways in which Federal activities may affect various aspects of the species and habitat.” The wildlife specialist report completed an effects analysis on each alternative (pages 157 to 165, DEIS), but did not design road exclusion zones or provide advice.
03032011-17-10b	Chiricahua leopard frog analysis omitted fact is that frogs disperse only on rainy nights. The DEIS omits traffic count data which the Gila National Forest has on ML-2 and ML-3 roads.	Factors identified as being important include rainfall, humidity, perennial corridors, seasonal surface water, and mesic corridors. Some data exist on dispersal distances and the Gila used the USFWS recommendations for these distances (Southwest Endangered Species Act Team 2008 and U.S. Fish and Wildlife Service 2007). So, the existing information does suggest that frogs disperse on rainy nights, but additionally the literature discussed above and on page 159 of the DEIS indicates other conditions should be considered. On pages 134 and 136, the DEIS discusses how traffic affects wildlife and how miles of road were used as an indicator of potential effects. Additionally, page 164 (table 84) of the DEIS discusses how reduced traffic would benefit this species. The wildlife report acknowledges that the higher the level of use on a road, the greater potential to affect a species. Current traffic count data does not exist.
03032011-17-10c	Chiricahua leopard frog analysis: Presence of roads themselves not a significant issue within the habitat.	An overview of the analysis process used for all terrestrial species is documented on pages 134 to 137 of the DEIS. The analysis of direct and indirect effects to this species by alternative and a determination by alternative is documented on pages of 157 to 165 of the DEIS. Cumulative effects are documented on pages 207 to 212. Findings determination for reptiles and amphibians notes that none of the alternatives would affect the viability of reptiles and amphibians that occur on the Gila National Forest.
03032011-17-10d	Chiricahua leopard frog analysis: Cumulative effects analysis does not disclose what has caused the existing condition of the species.	Page 159 of the DEIS acknowledges that disease has been a big contributing factor to the existing condition of this species, but there are other forest management actions that can cause direct and indirect effects including motorized use, as discussed on pages 157 to 165 of the DEIS.

Goshawk

Letter/ Comment #	Summary Statement	Wildlife, Goshawk - Response to Comments
03022011-15-18c	Apparently it does not matter that the species is thriving next to a road or trail (goshawk, falcon, elk, turkey, woodpecker, mourning dove). The only standard is proximity.	The DEIS discloses the direct, indirect, and cumulative effects of each alternative on the goshawk (pages 166 to 173, and pages 207 to 212).The goshawk analysis in the DEIS and wildlife specialist report considered the best available science and the Forest Plan standards and guidelines when completing alternative analysis. The Forest Plan standards and guidelines state: Limit human activity in post-fledgling family areas during the breeding season; limit human activities in or near nest sites and post-fledgling family areas during the breeding season; manage road densities at the lowest level possible (draft wildlife specialist report, table 8, page 18). The analysis is a cause-and-effect analysis at the forest level that analyzes the potential to affect terrestrial species under the different alternatives using the best available data. Literature that is referenced throughout the DEIS wildlife section documents that motorized use facilitated by access routes affects wildlife (DEIS, pages 126 to 212). Additionally, the agency did not ignore the site-specific data. Alternatives were developed by specialists spending many hours and days looking at all the roads with potential to affect a sensitive resource and then determining how it fit into one of the action alternatives. Therefore, biologists spent a large amount of time comparing goshawk location and habitat data to our existing road system and how it should be considered for each alternative.
03072011-53-8a 03072011-98-8a	Closure of roads that enter goshawk habitat.	The DEIS discloses the direct, indirect, and cumulative effects of each alternative on the goshawk (pages 166 to 173, and pages 207 to 212).The goshawk analysis in the DEIS and wildlife specialist report considered the best available science and the Forest Plan standards and guidelines when completing alternative analysis. The Forest Plan standards and guidelines state: Limit human activity in post-fledgling family areas during the breeding season; limit human activities in or near nest sites and post-fledgling family areas during the breeding season; manage road densities at the lowest level possible (draft wildlife specialist report, table 8, page 18). Alternative E does not have any motorized trails in goshawk post-fledgling family areas (draft wildlife specialist report, table 54, page 83).

Mexican Gray Wolf

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01072011-01-6 01072011-02-3 01072011-04-2 01072011-08-5 01072011-19-2 01072011-21-5 01072011-22-4 01072011-25 to 96-6 01082011-04-5 01082011-07 to 64-6 01092011-01-2 01092011-05 to 23-6 01102011-09 to 23-6 01112011-02-5 01122011-01-5 01122011-06 to 19-6 01132011-01-2 01132011-08-6 01132011-15 to 23-6 01142011-04 to 09-6 01162011-01 to 05-6 01172011-02-5 01172011-03-6 01172011-04-6 01182011-10-6 01182011-11-6 01202011-01-2 01202011-04-6 01202011-05-6 01252011-03-6 01262011-05-4 01282011-03-6 01292011-03-12	Requests more closures of roads in Mexican gray wolf habitat that increase the likelihood of human/wolf interactions.	The DEIS also discloses the direct, indirect, and cumulative effects of each alternative on this species. Table 66 of the DEIS (page 148) displays the percent change in road density (miles per square mile) by alternative. All alternatives reduce roads within wolf habitat. Alternative E reduces the route density the most (40 percent). Alternatives D, F, and G range from 22 to 29 percent reduction in route density. Alternative C has the least reduction (2 percent).

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01312011-02-6 01312011-03-6 02022011-03-6 02032011-05-6 02032011-06-6 02112011-003-6 02112011-004-6 02142011-(002 to 016)-6 02152011-(003 to 006)-6 02162011-(007 to 013)-6 02172011-(002 to 004)-6 0220201-003-6 03032011-14-7 03072011-05-3 03072011-21-151a 03072011-77-3 03072011-142-2		
03072011-21-151b	Mexican gray wolf habitat is impacted by road density and roads allow more human interaction and illegal killings.	High road densities are not the cause of illegal wolf killings. It would be speculative to consider environmental effects caused by foreseeable criminal acts of third parties.
01132011-13-3 01262011-04-4	Supports alternative E for wolf protection. Recommends prioritizing road closures or road decommissioning that have the most adverse effect on the wolf's habitat and recovery.	The comment is noted. Alternative E reduces motorized routes and trails by 40 to 45 percent in Mexican gray wolf habitat (DEIS, page 148). Road decommissioning is outside the scope of this project.
01192011-02-20	Feels that protection of wolves is not valid since none of the alternatives are	The direct and indirect effects of each action alternative on the Mexican gray wolf are disclosed in the DEIS (pages 144 to 150). A MALAA determination is an Endangered Species Act Section 7 determination that is required

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	likely to jeopardize this species.	when an action has the potential to cause harm or harassment of even a single individual. This determination is required even if the overall action is benefitting the species as a whole. In reference to this analysis, there several alternatives benefit each federally listed species, but there is still the potential to affect individuals; therefore, a determination of MALAA was warranted. Several of the action alternatives are in compliance with the standard and guideline identified in the Forest Plan for federally listed species. Additionally, page 140 of the draft wildlife specialist report notes: “The Mexican Wolf Reintroduction EIS did not recognize road densities on the Gila National Forest as a problem; however, since the start of the reintroduction project in 1998, within the recovery area in Arizona and New Mexico illegal shootings and vehicle collisions have been the greatest source of wolf mortality. Of the 68 wolf deaths, between 1998 and June 1, 2009, 31 are associated with shooting and 12 with vehicle collision (U.S. Fish and Wildlife Service 2010). Localized 6th-code watersheds with higher road densities will continue to maintain higher exposure rates between humans and wide ranging carnivores, facilitating the potential for additional harvest of these species. Alternatives that maintain higher road densities levels will continue to facilitate this exposure (DEIS, pages 210 to 211).”
03042011-16-1	The Mexican gray wolf program and re-introduction was not addressed.	Beyond the scope of this analysis, but motorized recreation effects to wildlife, including Mexican gray wolf, are addressed on pages 148 and 210 of the DEIS.

Mexican Spotted Owl

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01192011-02-22	Mexican spotted owl would not be affected by any of the action alternatives.	The DEIS discloses the direct, indirect, and cumulative effects of each alternative on the Mexican spotted owl (pages 165 to 177, and pages 207 to 212). All action alternatives except C document a reduction in motorized routes in Mexican spotted owl habitat (DEIS, tables 95, 96, and 97, pages 173 to 174). The Mexican spotted owl analysis in the DEIS and wildlife specialist report considered the best available science and the Forest Plan standards and guidelines when completing alternative analysis. The Forest Plan standards and guidelines that related to protecting and improving this species and its habitat are documented in the draft wildlife specialist report, table 8, pages 17 to 18.

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03022011-15-18a	Does not agree with the analysis for Mexican spotted owl in regard to road impacts.	The DEIS considers Mexican spotted owl territory or protected activity center, designated critical habitat, and mixed conifer/restricted habitat location information in relationship to changes in motorized recreational by alternative to complete the analysis (pages 166 to 177, DEIS). The empirical evidence does not suggest that owls are not disturbed by roads or motorized recreation as this commenter has suggested. The literature identifies the potential effects of motorized recreation to Mexican spotted owl s (pages 166 to 168 DEIS). The Mexican spotted owl analysis in the wildlife specialist report and DEIS identifies that motorized routes continue to cause habitat loss, but acknowledges that the potential for direct effects to the species itself is relatively low because of the lower traffic rates, and the tendency for this species to be active at night. For indirect effects, the specialist report states: “The literature suggests that raptors are unlikely to be disturbed by routine use of roads, homes, and other facilities where such use pre-dates the species (page 166, DEIS). Therefore, in most cases the potential for disturbance is low, but still has the potential to occur. The analysis is a cause-and-effect analysis at the forest level that analyzes the potential to affect terrestrial species under the different alternatives using the best available data. Additionally, the agency did not ignore the site-specific data. Alternatives were developed by specialists spending many hours and days looking all the roads that had the potential to affect a sensitive resource and then determining how it fit into one of the action alternatives. Therefore, biologists spent a large amount of time comparing Mexican spotted owl location and habitat data to our existing road system and how it should be considered for each alternative.