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National Forest

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# Final Environmental Impact Statement Appendix A – Response to Comments



# APPENDIX A

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## **APPENDIX A – PUBLIC INVOLVEMENT**

### **Introduction**

As a federal agency, we are required to solicit public comment on our draft plans involving significant actions under the National Environmental Policy Act (NEPA). Further, we are directed to “assess and consider [the resulting] comments both individually and collectively.” In addition, we view such comments as critical in helping us to shape a responsible plan for management of the Wasatch-Cache National Forest that best meets the Forest Service’s mission, legal mandates, the goals of NEPA and the National Forest Management Act (NFMA), and the interests of the American public as a whole.

Forest and Intermountain Region leadership and the forest plan interdisciplinary team have examined the range of public opinion on the issues and alternatives identified during the forest plan revision process. The Forest Service places high value on the reasoned and heartfelt comments that were received.

This appendix includes five sections. The first section outlines the public outreach activities and efforts made to solicit public input during the forest plan revision process. The second section is a summary of the 3,700 responses to the Draft Environmental Impact Statement (DEIS) and Proposed Forest Plan. The third section describes how we analyzed the formal public comment we received on the DEIS and Proposed Forest Plan. In the fourth section we list the public concerns and our response to them. The fifth section includes copies of all comments received on draft EIS from the Federal, State, and local agencies and elected officials.

### **Public Outreach**

Because the land and resource management planning process determines how the lands of the National Forest System are to be managed, the public is encouraged to participate throughout the planning process. Several opportunities were presented to members of the public to gather their input and allow involvement essential to drafting these documents.

Initially, areas where the plan needed changes or updating were identified by the Planning staff, after reviewing environmental documents on file, the 1992 Monitoring Report, meetings and letters from the public, and conversations with other Forest personnel. These needs for change were formally taken to the public in April of 1999 in the Preliminary Analysis of the Management Situation (PAMS). It also included an assessment of conditions and described the new framework for a forest plan. The concept of management prescriptions was introduced as part of the framework. Throughout April and May 1999 public information forums in 11 communities were held. We heard from several hundred people through letters, e-mail messages, and conversations at open houses.

The Need for Change topics evolved into the Revision topics. Once revision topics were identified, in September of 1999 the Proposed Action for Plan Revision and Notice of Intent (NOI) for the preparation of an environmental impact statement were released for comment. Public meetings were held in four communities to explain the Proposed Action for the Forest Plan Revision. Approximately 150 people attended these meetings and some 247 comments were received.

In November and December 1999 we began to develop alternatives to the Proposed Action. Public workshops (8 sessions in 4 communities) were held to review issues and to engage the public in assisting with mapping of alternatives. Over 400 people attended. Opinions were diverse and the level of interest in Forest Plan Revision high. There were significant comments on snowmobiling, livestock grazing, recreation opportunities, and roadless/wilderness areas. The alternatives were developed to reflect these comments.

At key points we provided feedback to the public about our progress and comments we had heard. A Wasatch-Cache Newsletter on Plan Revision Update was mailed to 1,695 people in December 1999. Early in the new year a summary of public comments on the Proposed Action and their disposition were sent to participants.

A document explaining the five preliminary alternatives was mailed to public for comments in August of 2000. Feedback from the public helped the Planning team refine the alternatives to be analyzed in depth and the development of the preferred alternative to be displayed in the DEIS and Proposed Plan. It was crafted using some aspects of other alternatives.

In May 2001 we mailed the Proposed Forest Plan and Draft Environmental Impact Statement out to public and other agencies for review. Recognizing the complexity and detail of the planning document and maps we hosted a series of open houses in key communities. Forest leadership and the Planning Team were on hand to answer questions and gather comments.

During the summer and fall, planning team members appeared at numerous organization meetings to listen and explain the Proposed Forest Plan. In October and November we held formal oral comment hearings in key communities. We received over 200 oral comments on DEIS and Proposed Forest Plan. By the close of the comment period in November 2001, the forest had received over 3,700 formal comments on DEIS and Proposed Forest Plan. In June of 2002 a newsletter providing a general overview of these comments was mailed to nearly 5,000 recipients.

The Final EIS examines seven alternatives. Alternative 7 was formulated to deal specifically in response to comments on the draft EIS and new analysis completed after development of the release of the DEIS and Proposed Plan. Each alternative contains a theme that provides emphases for human uses and physical and biological resource management.

Members of the Forest Planning staff have coordinated with other federal agencies, the Bureau of Land Management; Fish and Wildlife Service; National Park Service; and

Natural Resources Conservation Service; and various state agencies, including the Department of Natural Resources; the Utah Division of Wildlife; and the Governor's Office of Planning and Budget. Staff also coordinated with Utah State University, U.S. Congressional representatives, county planners and county commissioners.

Beginning in May of 2000 we coordinated and consulted with Uinta County, Wyoming and Summit County, Utah who have been identified as Cooperating Agencies.

## **Summary of Public Comment**

The following is a summary of public comment received by the Wasatch-Cache National Forest (WCNF) regarding the draft revised Land and Resource Management Plan (Forest Plan) for the WCNF and accompanying Draft Environmental Impact Statement (Draft EIS). The comment period was May 9 to November 1, 2001. The WCNF received 3,762 responses, including transcripts of oral comments from formal public meetings, letters, emails, and faxes.

The summary begins with a general overview of public comment on the Draft EIS and Forest Plan, and follows with a discussion of respondents' main areas of concern. This summary is not intended to provide an exhaustive account of public concerns. Indeed, much of the comment on the WCNF Draft EIS and Forest Plan consists of site-specific requests for management prescription category allocations and travel/recreation allocations; these site-specific comments cover so much ground (figuratively and literally) that they do not lend themselves to a brief summarization. This summary, therefore, is intended only to give a general discussion of the pervasive themes running through public comment.

## **General Overview of Public Comment**

Public comment on the Draft EIS and Forest Plan is far-reaching, often highly detailed, and represents a wide range of values and perspectives with respect to public land management in general and management of the WCNF in particular. Given this wide range of values and perspectives only broad generalizations are possible.

In general, those who comment fall roughly into two groups: those who tend to emphasize preservation and protection of forest natural resources, and so request greater restrictions on various human uses; and those who tend to emphasize motorized access to and traditional use of forest lands, and so request either fewer or at least no additional restrictions. The distinction between these two groups is not absolute. The former group also values access and use; while the latter group also expresses concern for forest protection. Virtually everyone who comments on the Forest Plan and Draft EIS cares about the condition of the WCNF and about the value it has to users of all types. The difference is one of emphasis, and this often revolves around each group's perception of the nature and degree of impacts caused by human activities, especially recreational activities.

This difference in emphasis is reflected in the preferences people voice regarding the general management philosophy that ought to guide the WCNF. The preservation-oriented group favors ecosystem/restoration management: they stress preservation of natural processes and landscapes, ecosystem protection, and restoration of degraded areas. The use-oriented group favors multiple use management which, under their interpretation allows much more active management of forest resources, allows traditional levels of commodity extraction and grazing, and allows widespread motorized recreation (this management philosophy is referred to in the document as Traditional Multiple Use Management).

These different perspectives drive the comments people offer on virtually every topic. The single most frequently mentioned topic in public comment, however, is recreation, in particular motorized recreation. Preservation-oriented respondents frequently request that motorized recreation, both summer and winter, either be restricted or prohibited—in general, under certain conditions, or in specific areas. Use-oriented respondents frequently request that motorized recreation, both summer and winter, either be allowed or at least not be further restricted—in general, under certain conditions, or in specific areas.

Those who ask that motorized recreation be restricted appeal primarily to environmental and social considerations. According to these respondents, motorized recreation causes erosion and degrades the environment, damages watersheds, produces noise and air pollution, and disrupts wildlife. The noise and exhaust, they say, also disrupts non-motorized recreationists who go into the canyons to escape from the hustle and bustle of urban life, and to gather peace and mental rejuvenation from quiet, pristine landscapes. These respondents also say that restrictions will not negatively impact motorized users inasmuch as there are already so many areas open to them.

Those who ask that motorized recreation not be restricted argue that it does not harm the environment. While some people violate motorized boundaries and engage in behavior that is harmful to resources, they say, that is no reason to restrict all users; rather, the WCNF should rely on education and enforcement. Beyond that, these respondents appeal primarily to social and economic considerations. Many say that motorized recreation has become a much-loved family tradition, one that family members of all ages and physical abilities can enjoy. Indeed, these respondents frequently argue that motorized access is essential for the elderly and the physically impaired (a point countered by other respondents, however). Further, they maintain, motorized recreation contributes significantly to local economies.

These different views frame the significant number of site-specific requests made by the public. Respondents submit many requests regarding management prescription category allocations, travel and recreation allocations, roadless area designations and management, and wilderness recommendations and management. These numerous requests relative to specific areas, in conjunction with all other concerns raised by the public, reveal how important the WCNF is to people, and how much they care about its management and the many benefits they derive from it. Further, as allocation decisions are at the heart of the



Forest Plan, these comments and their rationales provide the planning team important feedback for use in final decisionmaking. Please consult the full summary of public concerns to review the site-specific comments as well as to examine the full range of public comment.

## **Overview of Comment on Specific Topics**

Following is a summary of public comment on specific topics. These topics include forest plan development and planning issues, the alternatives, forest plan direction with respect to management prescription categories, and various management activities and affected resources.

### **Forest Plan Development and Public Involvement**

#### **Adequacy of the Document**

A number of respondents make a point of saying they find the proposed Forest Plan and Draft EIS well done, clear, and immensely readable. Other respondents suggest various ways in which the WCNF should improve its documents. Suggestions include providing a more detailed table of contents or an index; producing a cross-walk document to clarify the relationship between the current and proposed Forest Plan; providing sufficient detail for site-specific travel analysis; improving the quality of its maps; and making various technical corrections.

#### **General Adequacy of the Draft EIS Effects Analysis**

A number of respondents comment that the Draft EIS cumulative effects analysis is inadequate. Others advise the WCNF to factor into its effects analysis the effects of management—including the level of development—of adjacent non-federal lands.

#### **Relation of the Forest Plan to the Roadless Area Conservation Rule**

People offer very different views regarding the possible application of the Roadless Area Conservation Rule to the WCNF forest planning process. A number of respondents advise the WCNF to protect roadless areas in a manner consistent with the Rule regardless of the Rule's legal status. On a similar note, many say the WCNF should establish its own strong protection of roadless areas independent of national rulemaking.

Others advocate that the WCNF not manage roadless areas in accord with the Rule. Indeed, assert some, the final Forest Plan should state that it is not required to comply with the Rule, pending resolution of legal challenges, and should state that inventoried roadless areas will not be subject to any restrictions beyond the assigned management prescription category.

## **Forest Plan Development General**

A number of respondents offer varied comments regarding the general development and adequacy of the Forest Plan. According to some, the proposed plan allows too much management flexibility. Suggestions for reducing flexibility include providing detailed descriptions of desired future conditions; more effectively integrating desired future conditions for each resource to those for management areas as a whole; more effectively linking desired future conditions to anticipated management actions; adding specific and measurable standards throughout the final Forest Plan; listing prescription-specific standards and guidelines separately from forest-wide direction; and eliminating the word “generally” from all management prescription category descriptions. Others, however, recommend increasing management flexibility—by reducing specificity in the management prescription categories, and by reevaluating management prescription categories on a district-by-district basis.

## **Public Involvement Efforts**

One respondent commends the WCNF for “involving the public throughout the process of producing a thorough, well researched DEIS.” Others suggest ways of improving its outreach efforts with the public—by expanding outreach efforts with motorized recreationists in order to improve support for travel management decisions; by holding informational planning meetings at the ski resorts in order to seek comment from out-of-staters who come here to ski; and by publishing documents and holding meetings in Spanish in order to reach the growing Hispanic population who lives along the Wasatch Front and recreates in the Tri-Canyon area. Others comment on the need to maintain a friendlier, more neutral atmosphere at public meetings, saying that inflammatory language—especially comparing environmentalists to terrorists in light of the events of September 11—is uncalled for and intimidating to other participants.

## **Use of Public Comment in the Decision Process**

A few individuals suggest the WCNF should advise people about how to write effective comment and should make it easier to submit e-mail comments. Beyond that, most respondents who address this topic offer suggestions on how the WCNF should weigh public comment in the decision making process. Some say greater weight should be given to those who pay fees. Several say that more weight should be placed on comments from local users. Others, however, contend that federal lands are for all of our use. Some complain that many people who submit comment are ill-informed about the issues, and so greater weight should be given to detailed, scientifically-backed comments.

Some members of the public emphasize that the comment consideration process should not be turned into a vote. Others, however, advise the WCNF to canvass public opinion by, for example taking a public opinion poll or field surveying people who are actually using the land in question.

Finally, some people suggest that submission of written comment may not provide the best means of interaction between the public and decision makers inasmuch as response to individual concerns and oral comments at meetings, if it does come, comes at a much later date. One individual suggests convening less formal town meetings prior to finalizing the Forest Plan; others say the WCNF should provide specific responses to individual comments.

### **Involvement of Interest Groups**

The perceived influence of special interest groups sparks very divided comment. Some thought in many cases powerful national environmental organizations use ‘junk’ science and are interested in only closing public lands to vehicle access and recreation. Typical comments on the other side is the charge that private and corporate interests have undue influence.

### **Collaboration**

Respondents suggest that the WCNF should collaborate with state, county, and local governments in addressing a number of administrative/management issues—such as the size of recreational motorized tags, coordination of wildlife introductions, coordination with zoning regulations, and the use of cooperating agency status. Additionally, some advise the WCNF to better coordinate its management with that of adjacent national forests. Suggestions include working with both the Caribou and Uinta National Forests regarding wilderness recommendations; working with the Uinta National Forest to establish consistent requirements for the Snowbird ski area; and working with adjacent forests to ensure consistent management prescription categories, allocations, and travel management plans.

### **Alternatives**

#### **Adequacy of Alternatives**

Many people reference the alternatives in their comments. Most respondents justify their preference for or against a given alternative within the context of effects on a particular resource area; hence it is in the resource sections of the document that most of these comments are found. A number of respondents do specifically assert, however, that the range of alternatives are inadequate and suggest ways that it could be broadened. Often people suggest including an alternative which emphasizes their preferred management of a particular resource—e.g., restricting motorized access, eliminating timber harvest and grazing, recommending all roadless areas as wilderness, or protecting biodiversity and ecosystem services. Some suggest the WCNF provide a balanced range of non-motorized winter recreation designations; a wider range of wilderness recommendations; and a full range of alternatives for grazing.

Additionally, a few respondents offer detailed requests for a new alternative. Some suggest a new alternative should offer a more balanced approach to resource protection,

commodity output, and recreational opportunity than any of the six alternatives under consideration.

### **Comparison of Alternatives**

Several respondents advise the WCNF to specifically compare the effectiveness of Alternatives 1 and 6 with respect to management prescriptions, motorized recreation, winter recreation, scenic quality, and ecosystem protection. Others ask that resource outputs be provided for each alternative, and that all be compared with respect to forest health—including wildfire, insects, and disease.

### **Alternatives Considered in Detail**

Of those respondents who specifically address the advisability of implementing a particular alternative, most address their comments to Alternatives 1, 2, 5, and 6.

**Alternative 1** – Those who request that the WCNF select Alternative 1 assert that it best protects the environment, reduces motorized recreation, preserves recreational opportunities, prohibits other development, emphasizes wilderness protection, and protects habitat. Conversely, others ask that it not be selected because it promotes wilderness above other uses, restricts recreational opportunity, restricts use, and harms wildlife habitat.

**Alternative 2** – Some respondents suggest the WCNF select Alternative 2 because it preserves the land, protects the environment, and has the least impact on air quality. Others say Alternative 2 should not be chosen because it restricts recreational opportunities, restricts use, harms wildlife habitat, and promotes wilderness above other uses.

**Alternative 3** – A few respondents suggest the WCNF select Alternative 3 because it is well balanced, while one individual maintains that it recommends too much area for wilderness designation to be acceptable.

**Alternative 4** – A few respondents suggest the WCNF select Alternative 4 because it maintains existing uses and represents a fair compromise.

**Alternative 5** – Numerous respondents ask the WCNF to select Alternative 5 because it best supports diverse recreational use, as well as other traditional uses, while still providing adequate protection for the land, water, watershed, and wildlife of the forest ecosystem. They also stress that more wilderness is not needed. Others suggest that Alternative 5 should not be chosen because it allows too much off-road vehicle abuse and too much development.

**Alternative 6** – Many people advise the WCNF to select Alternative 6. They felt that Alternative 6 represents compromise. Those in favor of Alternative 6 emphasize that it protects the environment, protects recreational opportunities, and preserves heli-skiing.

Other respondents oppose Alternative 6. Those who oppose it typically fall into one of two groups: one group echoes the sentiment expressed in the first part of the above quote in saying they really prefer stronger protection and restrictions; the other group opposes it because it imposes too much protection.

Suggested modifications to Alternative 6 reflect these two different perspectives. According to some, Alternative 6 should be modified to more adequately protect the environment, to protect wildlife corridors, to protect Canadian lynx habitat, and to increase the areas recommended for wilderness. Others say it should be modified to preserve motorized recreation opportunities, and to create less restrictions overall.

## **Forest Plan Direction**

### **Management Prescription Categories**

Some respondents offer general comments about management prescription categories—such as that the WCNF should provide a more equitable distribution of acres by management prescription categories, or should allocate acreage in inverse proportion to the degree of impact of each activity. A few ask the WCNF to clarify the distinction between certain management prescription categories, such as that between 3.1 and 3.2, or between 2.6 and 4.1. Additionally, a number of respondents ask the WCNF to assign more protective management prescription categories to all roadless acres—by utilizing Management Prescription Categories 1.5, 2.4-2.7, or 4.1.

Beyond these general considerations, many respondents make site-specific requests for management prescription category allocations. Because many of these requests are so detailed and far-ranging, they cannot be adequately summarized. Rather, a few generalizations are offered regarding the general direction of these requests. In general, most site-specific requests reflect the same emphasis on more protective management prescription categories as that found in the comments directed to roadless acres as a whole. Most site-specific requests are for Management Prescription Categories 1.5, 2.4-2.7, 3.1-3.2, and 4.1. Some request Management Prescription Category 4.5 for certain locations to allow for ski area expansion. Other comments make very specific management requests for certain areas involving multiple management prescription category allocations—some focusing on protection/restoration, and some focusing on commodity production.

### **Recreation Opportunity Spectrum**

Many comments, which are directed specifically to Recreation Opportunity Spectrum allocations, are concerned about allocations for motorized recreation. Many request more semi-primitive motorized areas, saying the WCNF “[has] failed to adequately plan for the increase in popularity of motorized recreation in past years, let alone for the future.” Other respondents, however, maintain that semi-primitive non-motorized designations can be impacted by the noise coming from motorized designations on adjacent land. Many non-motorized recreationists assert that motorized use has exploded along with the

power of these vehicles, and request more non-motorized allocations to preserve their recreational experience and the environment. Another suggestion made by the public is that the WCNF develop four winter recreation classes: wilderness, non-motorized, motorized, and motorized heli-ski.

Beyond these general comments, some people make site-specific requests for Recreation Opportunity Spectrum allocations. Most ask the WCNF to apply or extend semi-primitive motorized corridors to trails in certain areas, or conversely to close these areas to motorized travel.

## **General Environmental Values**

Most general comments regarding environmental values address the advisability of ecosystem/restoration management versus traditional multiple use management.

### **Ecosystem/Restoration Management**

Many respondents request that the WCNF preserve forest lands in their natural state and restore degraded areas. People maintain that the WCNF should not rely on intensive management to preserve forest resources, but should instead minimize human interference. Some ask the WCNF to develop a comprehensive plan for ecosystem health and species viability. Within that context, some ask the WCNF to protect and restore ecological integrity, and to aggressively restore the historic range of variability by “allowing natural disturbance regimes to operate as freely as possible within the undeveloped landscapes.” Many feel that this approach best meets both human and environmental needs, especially since the Wasatch Mountains provide drinking water for many urban communities.

### **Traditional Multiple Use Management**

Numerous people advise the WCNF to continue traditional multiple use management. They believe multiple-use management goals are the only goals that will ‘best meet the needs’ of the public and provide for equal program delivery to all citizens including motorized visitors. This view is echoed by most respondents who identify themselves as motorized users. People also say this approach is needed to address forest health issues and to maintain important social values. Some individuals describe family traditions centered around motorized activities in the WCNF and fear that, in the absence of traditional multiple use management, they will not be able to continue those traditions into the generations to come. A few respondents also emphasize the need to protect heritage resources and western culture which is “characterized by access to the land for multiple-uses, friendliness, good neighborliness, and sharing”—and claim that traditional multiple use management is essential to that end.

## **Topic 1: Watershed Health Management**

Respondents often express concern over the effects of various agents on water quality—such as nitro aromatic compounds, sediment, and sewage spills—as well as the need to enhance water production. Most comment on water resources, however, addresses watershed health. People ask the WCNF to protect watersheds for a number of reasons, but primarily to preserve the water supply for a growing population.

Suggestions to address watershed health include designating sensitive or damaged watersheds and directing future management accordingly, and prohibiting any activities that degrade watershed health. People ask the WCNF to provide detailed strategies regarding water management in the final Forest Plan, and to more adequately analyze watershed condition and the impacts of various activities on watershed health.

## **Topic 2: Biodiversity and Viability Management**

### **Aquatic and Terrestrial Habitat**

Most of the comments on the topic of biodiversity and viability management address wildlife management. Some suggest that the WCNF improve its analysis of wildlife habitat—by instituting appropriate data collection; analyzing anticipated changes in habitat components; and analyzing the effects of tree density and road management on terrestrial wildlife. Respondents state that the WCNF should protect critical wildlife habitat by providing adequate direction for wildlife habitat management, by giving priority to actions that enhance habitat, and by preserving large tracts of land. They suggest improving aquatic habitat protection by tying the monitoring of aquatic resources to specific management implementation, and by maintaining aquatic habitat through different allocations of management prescription categories.

Likewise, respondents ask the WCNF to preserve wildlife habitat corridors—by restoring wildlife habitats within the context of eco-regional planning; by protecting habitat corridors between forest areas; by protecting national forest lands sufficiently to offset adverse effects caused by management practices on private lands; and by prohibiting extractive uses, motorized vehicles, and grazing in wildlife corridors. On the other hand, some ask the WCNF not to manage for wildlife corridors.

### **Aquatic and Terrestrial Species**

Some respondents offer specific comment on a number of species. Some ask the WCNF to reconsider management of non-native wildlife, especially mountain goats and non-native fish; others ask the WCNF to emphasize big game species management and to protect big game winter ranges.

A number of respondents address their comments to predator management, in particular to management associated with the lynx. Some ask the WCNF to protect the lynx by protecting lynx habitat; by taking into account the variety of factors influencing the status of the lynx; and by developing goals, objectives, standards, and guidelines specifically

designed to mitigate impacts on the lynx. Others, however, maintain that studies on lynx management are inconclusive and that the lynx can survive along with traditional multiple use activities. Therefore, these respondents conclude, the WCNF should reevaluate any management prescription category designation, or alternative selection made based on the lynx, and should not restrict activities because of possible lynx habitat.

Another species mentioned often is the native cutthroat trout. People ask the WCNF to restore and expand its habitat and to better address the impacts of non-native fish species.

### **Management Indicator Species**

Various members of the public urge the WCNF to improve its management of management indicator species. Suggestions include prescribing goals, objectives, standards, guidelines, and mitigation measures for all management indicator species by developing an adequate monitoring program for management indicator species; and analyzing the relationships between management indicator species, habitat, and other species. Some suggest selecting additional terrestrial animals as management indicator species, others suggest including predators, or relying more heavily on bird species.

### **Threatened, Endangered, and Sensitive Species**

Respondents request that the WCNF better protect threatened, endangered, and sensitive species. Suggestions include providing a full range of standards and procedures for the selection of sensitive species; managing all threatened, endangered, and sensitive species in the context of the overall, functional ecosystem; improving monitoring of these species; and conducting surveys for sensitive species before allowing certain activities.

### **Vegetation**

People offer a wide variety of suggestions regarding vegetation management. Suggestions include providing a mix of vegetative age classes; maintaining more old growth forest; eliminating commercial timber harvest; ensuring adequate amounts of snags and downed wood; acting to reverse aspen decline; maintaining sagebrush communities; protecting the habitat for five unique species of wildflowers; revegetating with seed from native plants; and preserving nonvascular plant species. Some also express concern over management of noxious weeds. Some suggest restricting activities in areas where noxious weeds occur such as to avoid spreading them; others, however, say the WCNF should more fairly evaluate the spread of noxious weeds and not assume it is caused by motorized recreationists.

## **Topic 3: Road and Access Management**

Road and access management is a topic of great interest and concern to many respondents. Many of the comments that appear in this section of the document are closely related to comments in Recreation section.



## Road System Management

Numerous respondents comment on management of the road system. A few ask the WCNF to address Revised Statute 2477 (RS 2477) roads—by evaluating the direct and cumulative impacts of road closures on RS 2477 routes, and by recognizing RS 2477 road rights-of-way claimed by local governments for all routes in existence prior to 1976. Most who comment on the road system, however, address the topics of construction, maintenance, closure, removal, and obliteration. In addition to general comments summarized below, respondents make many site-specific requests for road management actions, management prescription category allocations, and recreation allocations that would allow or restrict types of travel.

**Road Construction/Reconstruction** – A number of people say the WCNF should allow road construction—by allowing construction of temporary roads as needed, or by allowing reconstruction of road and trail segments that are causing environmental impacts. Some people say that road construction should be allowed in roadless areas.

Others, however, state that road construction should be prohibited, or should be prohibited within certain areas. For example, one person suggests the WCNF prohibit roads across amphibian travel routes, while another respondent suggests it be prohibited in tundra and talus ecosystems. Some also maintain that it should be prohibited in roadless areas.

**Road Maintenance** – While opinion is divided over the topic of road construction, there is a general consensus that existing roads should be better maintained. Some ask the WCNF to address its road maintenance backlog. One person relates having witnessed very inefficient maintenance activities, and so admonishes the WCNF to be more efficient with road maintenance funds and personnel. Some suggest the WCNF raise road maintenance and construction standards in order to lessen environmental impacts. Specifically, some suggest removing all culverts and replacing them with bridges across permanent streams; increasing bridge maintenance; and minimizing the impacts of road maintenance near stream channels.

**Road Closure/Removal/Obliteration** – Most who address this topic request either that the WCNF close and reclaim roads under certain conditions or that it convert roads into trails. With respect to the former, respondents suggest the WCNF close roads in environmentally sensitive areas; that it close roads strategically in order to link roadless areas; and that it follow through with closure and reclamation of roads after timber projects are complete. With respect to the latter, one respondent suggests the WCNF consider an alternative that converts the backlog of unmaintained roads to motorized trails in order to provide challenging recreation opportunities at lower costs, while another requests that it continue converting roads to single-track trails. Most motorized recreationists, however, strongly object to road closures, including obliteration. Some feel that obliteration causes more damage than the existing roadbed.

## Trail System Management

Just as management of the road system is a frequent topic of comment, so is management of the trail system. On a general level, a few individuals ask the WCNF to address trail system management in coordination with local user groups and to retain emphasis on trail system planning in the Tri-Canyon area. In addition to comments summarized below, respondents make site-specific requests for trail management actions.

**Trail Construction/Reconstruction** – Several people ask the WCNF to expand the motorized trail system. Suggestions include providing sufficient summer motorized use zones to allow expanded trail systems; expanding the motorized trail network by taking advantage of existing snowmobile parking lots and trail corridors or by reopening some old logging roads as off-road vehicle trails; and providing more motorized loop trail systems. Some also state that motorized trails should be allowed in roadless areas.

Others, however, urge the WCNF not to expand the motorized trail network on the grounds that there is already sufficient motorized recreational access. Some say the WCNF should first maintain and streamline the existing motorized trail system before constructing new trails. Other individuals say, moreover, that motorized trails should not be constructed in roadless areas.

While most general comments regarding trail construction revolve around motorized trails, a number of site-specific requests regarding trail construction address non-motorized trails.

**Trail Maintenance** – Several people request the WCNF increase trail maintenance. Suggestions include investing more resources in trail maintenance in order to mitigate damage caused by off-road vehicle and hiking use; clearing trails early in the season to prevent damage caused by rerouting; adopting trail maintenance methods to reduce stream sedimentation; redesigning problem trails rather than closing them; improving the safety of trails used by horses; and increasing winter grooming and snowplowing.

**Trail Closure/Removal/Obliteration** – Some respondents express concern over trail closures for wildlife; one respondent suggests the WCNF use seasonal rather than permanent closures for wildlife whenever possible, and close trails to motorized use only if negative wildlife impacts are specifically documented. Additionally, this respondent suggests that the WCNF should relocate any routes that would otherwise be closed by timber, mining, or grazing activities. At the same time, one individual states that the WCNF should prevent user-caused conversion of single-track trails to off-road vehicle trails through closures and enforcement.

## **Travel Management**

Members of the public offer many comments related to travel management. Some request that the WCNF better analyze travel needs. Suggestions include inventorying and ground-truthing all roads and trails during the travel management planning process; estimating the number of miles and locations of user-created trails; fully considering issues found in publication FS-643, Roads Analysis; compiling more statistics about use levels and opportunities for different recreational types; and analyzing the comparative effects of different uses.

Other respondents are concerned about the effects on travel management of possible conflicts between management prescription category and recreation allocations. Some individuals ask the WCNF to define how such conflicts would be resolved; others ask that, given possible conflicts, prescriptions that are open to misinterpretation be removed. Most comments related to travel management, however, consist of site-specific requests for travel prescriptions, either for specific roads or trails or for specific areas. Most of these requests pertain to motorized versus non-motorized use, both summer and winter.

## **Topic 4: Recreation and Scenery Management**

### **Management General**

Recreation is the most frequent topic of comment on the WCNF Draft EIS and Forest Plan. A number of respondents express general concerns about recreation management, such as that the WCNF should manage recreation and other forest uses responsibly; should treat all user groups fairly; should disperse recreational users; and should not restrict access. Quite a few respondents also ask the WCNF to more adequately analyze recreational impacts and to conduct a carrying capacity analysis, especially in the Tri-Canyon area, which is of particular concern to many Wasatch Front residents. Some people say the WCNF should educate the public on proper use of the land and increase enforcement, particularly before imposing further restrictions.

People also offer many general comments on allowing or restricting specific activities. Some say recreational motorized activities should be allowed in order to promote family values, prevent crime, and to accommodate the growing population, as well as to maintain the economic benefits derived from recreation. Others say recreation should be restricted to protect the environment, forest health, and riparian areas. In addition to such general comments, many respondents offer views specific to certain areas of management or types of recreation. These comments are summarized below.

### **User Conflicts**

Both summer and winter recreationists express great concern over user conflicts. People suggest the WCNF consider examples of how other forests have reduced recreational conflicts, and that it implement a variety of remedies. One example is back-county skiers that ask the WCNF to segregate users. Many snowmobile enthusiasts, however, disagree.

While many non-motorized recreationists assert that motorized vehicles must be restricted to reduce environmental harm, user conflicts lie at the center of many requests for restrictions.

### **Monitoring and Enforcement**

Most who comment specifically on monitoring and enforcement ask the WCNF to monitor motorized recreation and enforce regulations. Both motorized and non-motorized users often say the WCNF should enforce regulations, though motorized users specifically add that this should be done rather than restrict their motorized activities. A number of writers ask the WCNF to monitor motorized recreation and enforce regulations in specific areas.

While many respondents—both in comments directed specifically to monitoring and enforcement and in comments offered in other contexts—suggest that specific areas should be closed to winter and/or summer motorized use, or that these activities be otherwise restricted in order to reduce user conflicts, others argue that such closures/restrictions will be meaningless without the resources to truly enforce them.

### **Motorized Recreation – Off-Road Vehicles**

As noted previously, comments about motorized recreation overlap extensively with general travel management, access, Recreation Opportunity Spectrum, and management prescription category comments. Opinion on this subject is quite polarized and many respondents submit their personal experiences to justify restrictions or their opposition to them.

Many respondents state that motorized recreation should be allowed, because it is a legitimate activity and because it does not harm the environment. These respondents also say off-road vehicle recreation should be allowed because the majority of the public supports it; because it is growing in popularity; because education of motorized users is working; and because motorized access leads to higher public appreciation of nature.

A number of people say it should be allowed because of its importance to families, because it is needed for safety or emergency use, and because it is needed to provide the disabled and elderly access to forest lands.

Many other respondents, however, state that motorized recreation should be prohibited or restricted. Often they say restrictions are needed because of the harm off-road vehicles do to the environment. People say restrictions are needed, further, because of erosion caused by user-created trails; because of the cumulative impacts resulting from the exponential increase in numbers of motorized users; because of noise and air pollution; because it affects non-motorized users' quality of experience; and because there are already adequate opportunities elsewhere in Utah.

Some respondents also make a point of refuting the argument that continued motorized access is needed to accommodate the elderly.

### **Motorized Recreation – Snowmobiles**

A number of respondents ask the WCNF to more adequately analyze the impacts of snowmobiling—by analyzing the impacts of having massive areas of compacted snow due to snowmobile use; reevaluating the advisability of allowing snowmobile use when snow cover is less than or equal to 12 inches; by incorporating new data into travel management planning about the effects of 2-stroke engines on the environment; and by analyzing the effects of snowmobiling on air quality, watersheds, and wildlife habitat. Beyond these requests, comments requesting either that snowmobiling be allowed or prohibited/restricted reflect the same concerns offered with respect to off-road vehicle use.

Many comments request site-specific winter closures—or oppose them—especially in the Cache-Box Elder and Uinta management areas.

### **Motorized Recreation – Heli-Skiing**

A number of respondents advise the WCNF to allow heli-skiing to continue—because it does not harm the environment; because noise is a minimal impact; because it is needed for safety reasons and to provide access for the disabled; and because of its positive economic impact.

Others say it should be prohibited or restricted because it negatively impacts wildlife and conflicts with other dispersed winter backcountry users. People express particular concern over its impacts on birds, especially raptors, arguing that frequent helicopter flights in February, March, and April disrupt their nesting habits and hinder reproductive success.

### **Mechanized Recreation**

Most who address mechanized recreation say it should be allowed—because it does not harm the environment; because it has no effect on water quality; because it contributes to the economy; and because there is no evidence that bicyclists pose a risk to other trail users' safety. Some, however, counter that it should be prohibited in certain areas because it harms the environment and is dangerous to hikers and animals. One organization asks that mechanized use be separated from motorized use for travel management purposes. This group acknowledges that there may be a need for limited site-specific restrictions but asks to be closely involved in these evaluations.

### **Non-Motorized Recreation**

Most who address their remarks specifically to non-motorized recreation say it should be emphasized—by giving non-motorized users the highest priority; by designating all

remaining roadless areas for non-motorized use; or by setting aside more areas which meet a variety of non-motorized needs. Many say that certain areas should be restricted to non-motorized uses only—e.g., the Tri-Canyons area, many roadless areas, and the North Slope of the Uintas. A few respondents, however, assert that non-motorized activities should also be restricted due to environmental impacts. According to some motorized users, hikers and skiers disturb wildlife more than they do.

### **Ski Area Expansion**

Several respondents state that ski areas should be allowed to expand. These respondents say the WCNF should not place restrictions on the ski industry based on the speculative possibility that the lynx, or other species, will be placed on the endangered species list; and that the WCNF should maintain a flexible policy rather than impose premature restrictions.

Many other respondents, however, argue that ski areas should not be allowed to expand any further. These people say that public land should not be used to subsidize real estate development; that the ski industry has not experienced growth sufficient to justify expansion; that it would take away non-motorized areas; that it is not something which benefits the whole population; and that it harms the environment. People object not only to expansion in terms of acreage, but also in terms of infrastructure development. They say, for example, that the WCNF should prohibit resort building on prominent ridges; should prohibit development of trams or lifts in roadless areas; and should not allow ski resorts to turn into all season recreation areas or destination resorts.

## **Topic 5: Roadless Areas/Wilderness Management**

### **Roadless Area Management**

Many people ask the WCNF to protect roadless areas, primarily to preserve environmental values. Some assert that regardless of the outcome of national rulemaking, local forests can and should take the initiative to protect these areas during forest planning because they are a limited resource. People ask more specifically to maintain roadless area characteristics of all inventoried roadless areas—by keeping existing roadless areas roadless, and by prohibiting all development and motorized recreation. Some ask that the WCNF protect roadless areas that are adjacent to wilderness areas, others that it designate watershed areas as roadless. Respondents also request roadless designation for a number of specific areas.

Others, however, object to designating areas as “roadless” and that many roadless areas contain roads. Others maintain that there are already enough roadless and wilderness areas, and no more are needed; instead, some suggest, the WCNF should develop a backcountry recreation area designation for roadless areas.

## **Wilderness Management**

Wilderness management and designation is a topic of great interest to respondents. Some ask that the WCNF clarify how wilderness areas will be managed; others express frustration over the time it sometimes takes to develop a management plan for wilderness areas and so ask the WCNF to prepare wilderness management plans in a timely manner. Some suggest that before recommending any more areas for wilderness designation, the WCNF should enforce existing wilderness regulations, provide education, or better explain the balance of resources and the needs of the people. Some suggest the WCNF reexamine the criteria for wilderness evaluation and the underlying legislation, and consider the capability availability, and need of individual roadless areas in determining wilderness potential.

## **Wilderness Recommendations**

Many respondents say that the WCNF should recommend additional wilderness areas for environmental reasons—to link wilderness areas together; to protect ecological health, watersheds, biodiversity, wildlife, threatened, endangered, and sensitive species; and to protect areas from the effects of mining and off-road vehicle recreation. People also request additional wilderness recommendations to allow research and education, to benefit future generations, to preserve the American spirit, and to benefit the economy.

A number of other respondents ask the WCNF not to recommend any more areas for wilderness designation. According to these respondents, wilderness designation is not need inasmuch as these areas can be adequately protected with careful stewardship, and a wilderness designation precludes management tools needed for forest health. People also oppose further recommendations on the grounds that areas should remain open for future generations; that motorized access is needed for the elderly; and that wilderness designations would restrict recreational access and hurt the economy. Some also urge the WCNF not to create de facto wilderness areas by adding more restrictions to proposed roadless areas, or by managing recommended wilderness areas for wilderness values.

Additionally, respondents submit many site-specific requests that certain areas either be, or not be, recommended for wilderness designation, often with detailed personal comments or reasoning for their requests.

## **Topic 6: Suitable Timberlands**

### **Management General**

On a general level, respondents ask the WCNF to clarify timber management prescriptions in the Forest Plan by, for example, including species-specific density requirements and management direction. Several people also ask the WCNF to modify the standards and guidelines related to timber management in a number of ways, generally with the intent to preserve environmental values.

### **Adequacy of Analysis**

Members of the public offer a number of comments on the adequacy of analysis relative to timber management. Some ask the WCNF, for example, to provide a more thorough analysis in compliance with the Forest Service Manual; one respondent suggests using FORPLAN to calculate allowable sale quantity and long-term sustained yield. Others ask the WCNF to analyze the cumulative effects of logging on threatened wildlife, and the effects of timber sales on atmospheric carbon levels. Some ask for more recent monitoring data and the allowable sale quantity for each alternative. It is also requested that the WCNF discuss timber harvest methods in the Final EIS, and that it continue to research best management practices for timber harvest methods.

### **Timber Harvest**

Some respondents ask the WCNF to allow timber harvest. One of the most common reasons given is forest health. People also ask that public fuel wood collection be allowed—to reduce fire hazards, warm households, and finance maintenance backlogs; to prevent waste of natural resources; and to help clean up the forest.

Others say the WCNF should restrict timber harvest, primarily to preserve environmental values. Some urge the WCNF not to use the concept of forest health as a justification for its timber commodity program. People also say timber harvest should be restricted because of its low economic value in comparison with amenity values, and because of the recreational, scenic, and biological values of the forests. A few individuals say it should be prohibited until the WCNF completes a proper accounting of timber harvest costs. Quite a few respondents, therefore, express support for Alternative 1, although often they concede that its ultimate selection is not likely.

In addition to these requests that timber harvest in general be restricted, a number of respondents ask specifically that it be prohibited in roadless areas—to allow natural forest processes to dominate, to preserve ecosystems from fragmentation, to protect wildlife, and to preserve roadless values.

## **Topic 7: Rangeland Capability, Suitability, and Forage Production**

### **Management General**

Most comment regarding rangeland capability, suitability, and forage production addresses specific topics; these comments are summarized below. On a general level, some respondents ask the WCNF to develop improved livestock grazing strategies in the final Forest Plan.

### **Adequacy of Analysis**

A number of respondents offer comment on the adequacy of analysis relative to rangeland management. Several ask the WCNF to adequately analyze the impacts of



livestock grazing—by analyzing environmental and economic impacts, site-specific impacts, and impacts on other forest uses; by documenting the rate of aspen decline; and by analyzing the effects of grazing against the economic benefits. People also ask the WCNF to clarify the relationship between animal unit months and terrestrial conditions; to clarify its discussion of permitted grazing levels; to justify its rationale for only closing three allotments in the Preferred Alternative; and to verify rangeland condition and trend.

### **Rangeland Management**

Respondents offer a wide variety of comment on specific aspects of rangeland management, including comment on goals, objectives, standards, guidelines, management prescription categories, suitability and capability, conditions and trends, properly functioning condition, restoration, monitoring and enforcement, and infrastructure. Most of the suggestions offered are aimed at reducing any negative impacts of grazing. This general concern over impacts is reflected in comments addressed to monitoring and enforcement. People ask the WCNF to monitor and enforce range quality standards and allotment management plans—to protect ecological values, to ensure overgrazing does not occur, to justify grazing at or near current levels, to meet legal requirements, and to protect wildlife and forest health. A few individuals, however, assert that, with proper management, the condition of grazing allotments can be maintained.

### **Allotments and Permits**

Most general comments regarding allotments and permits address the question of whether allotments should be maintained, phased out, or closed. Some respondents say the WCNF should reduce the number of grazing allotments available in order to protect resources—by closing vacant grazing allotments, by honoring existing leases but allowing leases to expire, and by allowing voluntary allotment retirements and voluntary waiving of grazing permits. One respondent, however, maintains that there should be no reductions in grazing allotments.

### **Grazing**

Several respondents urge the WCNF to continue to allow grazing. They believe grazing is an important deterrent to wildfires. They also state that it has been demonstrated in many western states that game animals often prefer and thrive on land holdings that are managed by and for livestock grazing. They assert the value of proper livestock grazing on Utah's forestlands is much greater than the revenue produced from the grazing fee. People argue that with appropriate management to protect forest resources, grazing is an acceptable use of public land, even of roadless areas, and that it is an important contributor to many rural counties.

Many other respondents, however, urge the WCNF to restrict, reduce, phase out, or prohibit grazing. People recommend it be restricted until condition and trend are verified; they say restrictions are necessary to protect water and aquatic resources and to preserve

recreational experiences. People likewise say it should be reduced in order to reach biodiversity goals; to prevent topsoil erosion, ground terracing, and vegetation destruction; and to restore streams for fishing. People say it should be phased out or prohibited to return to properly functioning condition, to allow vegetation to be restored, to preserve ecological values, to reduce fire hazard, to prevent the spread of noxious weeds, and to preserve scenic quality. Respondents go on to list a number of specific places where they would like to see grazing prohibited.

## **Topic 8: Special Designations**

Members of the public comment in general that the WCNF should identify more lands for special designations. In particular, some ask the WCNF to designate additional Research Natural Areas; one respondent asks it to identify potential areas that could contribute to diversity in the Research Natural Area system. Some ask the WCNF to manage lands as Special Areas in order to prevent impacts that will be harder to reverse, and to consider forming additional Special Areas. Additionally, one respondent asks the WCNF to provide interim protection for eligible Wild and Scenic Rivers by ensuring proposed activities are compatible with protection and designation. Several ask that additional Wild and Scenic Rivers be designated, although a few ask that no more designations be made. Respondents also refer to specific areas which they request be given, or not given, a particular special designation.

## **Topic 9: Oil and Gas Leasing**

Some people ask the WCNF to indicate where oil and gas exploration and development are to be allowed; to develop detailed standards for managing minerals, oil, and gas exploration/extraction in order to protect environmental values; to inspect oil and gas development sites; and to ensure that oil and gas exploration sites are restored. People also ask the WCNF to more adequately analyze oil and gas potential.

A few respondents state that oil and gas leasing should be encouraged. Others say it should be prohibited in roadless areas in order to protect unique and vital habitat, and to preserve roadless characteristics and values.

## **Topic 10: Fire Management**

Members of the public offer a number of general comments regarding fire management. A common suggestion is that the WCNF should evaluate the feasibility of fire management in non-motorized, roadless, and wilderness areas—with respect to protecting habitat, managing small roadless areas, meeting desired landscape goals, and protecting watersheds. Many other comments include specific suggestions regarding fire management strategies.

Some respondents assert that the WCNF should more fully utilize timber harvest and grazing in conjunction with prescribed burns—to avoid wasting resources, to maintain a healthy forest, to avert fire risk, to bring the forest back into historic range of variability,

and to maintain the viability of local economies. Others, however, say the WCNF should reevaluate timber harvesting and mechanical treatments as means to meet forest goals—because of their inability to restore fire-adapted ecosystems, because of the role of standing dead timber in forest wild fires, because mature trees are needed for wildlife habitat, because young trees have high fuel load values, because timber harvesting cannot replace the role of fire in the forest, and because harvested areas show a strong association with increased rate of spread and flame length.

This same difference of opinion is reflected in comments on prescribed burns. Some say the WCNF should not rely on prescribed burns for fire management because they do not prevent high-severity fires and because they are not adequate to meet forest goals. Others say they should be used in order to maintain bio-integrity.

## **Locatable and Salable Minerals**

A few respondents comment on locatable and salable minerals. One requests that the WCNF add objectives for mineral and energy exploration and development, and that it discuss the management direction for geologic, paleontologic, and mineral resources in the Forest Plan. Another respondent asserts that recreational mining should be allowed to continue because it is not harmful; others say the WCNF should restore areas with mining damage in order to protect watershed health and to restore scenic values.

## **Social and Economic Analysis**

### **Adequacy of Social and Economic Analysis General**

Some respondents ask the WCNF to prepare an adequate socioeconomic analysis—by including costs associated with different management activities; by analyzing the receipts and expenditures of the fee demo program; by analyzing the social and economic impacts on all forest users, not just local communities; and by including the results of specific recent studies on recreational economics.

### **Social Values**

The two most common concerns related to social values are population growth and development. Some people urge the WCNF to factor projected population growth into management plans—by identifying the combined impacts of all users instead of viewing them separately, and by acknowledging that population growth will result in restrictions on traditional experiences. With respect to development, most people say the WCNF should prohibit further development of various kinds on the forest. Some say development should be prohibited for environmental reasons—to protect wildlife habitat and winter range, and to protect watersheds. Some say it should be prohibited for social reasons—to provide escape from the urban environment, to preserve natural environments for the future, and to avoid bringing more users into the forests.

### **Adequacy of Economic Analysis**

A number of respondents express concern over the adequacy of the economic analysis and offer suggestions for improving it. Some of the suggestions include separating different industries and communities, using more recent data, disclosing the real socio-economic impacts of the various alternatives, using the travel cost method and contingent valuation method to analyze social and economic valuations, and including information about externalized costs passed on to communities, businesses, and individuals when national forests are developed or intensively managed for various activities. Some ask the WCNF to strengthen its cost/benefits analysis by, for example, providing a full accounting of benefits and costs, including environmental benefits (clean air, clean water, etc.) of undisturbed forest lands; and some ask the WCNF to provide a full accounting of costs associated with various activities, such as timber harvest and grazing.

A number of respondents comment on the net public benefits analysis. A few ask the WCNF to revise or eliminate that analysis because the 50-year time frame is meaningless and because it is based on faulty assumptions. Others say the that WCNF should establish accurate benchmarks for the net public benefits analysis; that it should establish an analytical process to demonstrate that the final Forest Plan will maximize net public benefits; and that it should quantify ecosystem service values and externalized costs of commodity production in the net public benefits analysis.

### **Economic Impacts**

Several respondents ask the WCNF to acknowledge the important economic contribution of various activities, such as recreation and tourism, motorized use, and grazing.

### **Lands, Real Estate, and Property Boundary Management**

Several people write to say the WCNF should acquire additional private lands—to protect multiple resources, to protect moose habitat, and to preserve watersheds. One individual asks the WCNF to eliminate all private inholdings in roadless areas. Another person advises the WCNF to consider additional land exchanges, but only with adequate public involvement; others, however, urge the WCNF not to exchange lands within the Tri-Canyon area which would compromise watershed health and wildlife or which would create developable private property.

Additionally, a number of respondents request that the WCNF acquire more access rights-of-way across private lands; while one respondent asks the WCNF to process easement applications in a timely fashion for inholders. Recreational access, both motorized and non-motorized, is of particular concern as adjacent private lands become increasingly developed.

## Analysis of Public Comment

All letters, emails, faxes, comment forms, and transcripts of public hearing testimony received as public comment on the proposed forest plan and DEIS were compiled, organized, read, and analyzed by the U.S. Forest Service Content Analysis Team (CAT). This team, a unit of the U.S. Forest Service Washington Office Ecosystem Management Coordination branch, specializes in public comment processing and consideration. This team uses a process they have developed called “content analysis” which allows systematic review of public comment on a proposed plan or project through the creation and use of comprehensive electronic comment database. This method is particularly effective in analyzing voluminous comment both individually and collectively, as required by NEPA.

The CAT analytical process is comprised of three main components: a categorical coding structure and standardized process for its application, a comment database and mailing list, and a set of summary reports. In the content analysis process, each letter, postcard, transcript text, or other document (collectively referred to as “**response letters**” in this appendix) is assigned a unique tracking number. Each author or signatory to a response is called a “**respondent**”. All respondents’ names and addresses are entered into a project-specific database program to produce a complete mailing list. Each respondent is also assigned a unique identifier number for tracking purposes. All respondents are linked to their individual responses and comments in the database using these identifying numbers. Project-specific demographic information is also recorded in the database, such as any self-identified organizational affiliation or whether the response letter submitted is part of an organized response campaign.

Staff analysts then read all public response letters in their entirety and proceed to identify discrete **comments** within them that relate to a particular concern, resource consideration, or proposed management action. Every effort is made to keep each comment within sufficient context that it is a stand-alone statement. Analysts look for not only each action or change requested by the public, but also the reason(s) behind each request in order to capture the full argument of each comment. Therefore, paragraphs within a response letter may be divided into several comments because multiple arguments are presented, or alternatively, several paragraphs that form one coherent statement may be coded into one comment. While simple statements of opinion without a rationale are captured in the process and entered in the project database, it is the strength of each rationale as a complete argument that provides the interdisciplinary team a substantive comment to consider.

Once stand-alone comments are identified, analysts assign each comment to a numerical code that identifies the overall subject area. They use a systematic numerical categorization or “coding” structure that has been specifically tailored to project documents. Each project-specific coding structure is a tool to help sort comments into logical groups by topics. In this case, the coding structure was organized to follow the topic order of the DEIS and components of the proposed forest plan documents, and was designed to be inclusive rather than restrictive in order to sufficiently capture all

comments. Depending on project complexity and needs, analysts may also assign secondary codes to track those comments that refer to such subtopics as specific plan or EIS elements, land areas, or individual roads or trails, to permit finer-scale sorting of comments. The coding structure and other supporting documentation is available in the administrative record at the Supervisor's Office in Salt Lake City, UT.

After being coded, each response letter's set of coded comments is entered verbatim into the project database. This database serves as the complete project record and allows analysts and planning team members to run specialized reports, identify public concerns, and determine the relationships among them.

The content analysis process also identifies all response letters that are submitted as part of an organized response (or "form letter") campaign and therefore contain identical text. These are grouped by campaign, and all mailing information for each respondent is entered into the project database, as well as an identifier code for the campaign. Analysts also code a "master" campaign letter and enter all comments verbatim into the project database so that they are considered alongside all non-campaign comments. If a respondent adds original comments to the organized response letter he or she submits, these comments are identified, coded and entered into the database.

The third phase of content analysis includes composing statements of **public concern** and then preparing a narrative summary. Analysts review the entire comment database, sorted by topic area, and then write public concerns to summarize comments that present similar arguments or positions. Each formal statement of concern is accompanied by one or more sample comments which provide respondents' specific perspectives and rationales regarding that concern. For each sample comment a letter number is provided, enabling the reader to track and review the original response, if necessary.

Each public concern is worded to capture the action that one or more members of the public feel the Wasatch-Cache National Forest should undertake and provides the decision-maker with a clear sense of actions the public is requesting. Because each concern statement is a summary, it can represent one or many comments, depending on the actual comments submitted. Concern statements range from extremely broad generalities to extremely specific points because they reflect the content of verbatim public comments. Once the comments have been exhaustively reviewed and the range of concerns identified, CAT then submits a **Summary of Public Concerns** report to the interdisciplinary team, who is responsible for the next stage of comment consideration, response to comment. At this stage, the interdisciplinary team determines whether comments are substantive and in scope, and then composes responses to comment. For more information on the content analysis process, the reader may contact the forest Service Content Analysis Team in Salt Lake City, UT.

Public concern statements are not intended to replace actual comment letters or sample quotes. Rather, they can help guide the reviewer to comments on the specific topic in which he or she may be interested. All original response letters in their entirety are on file at the Supervisor's office in Salt Lake City, UT.

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

The final CAT reports are summary documents. As such, they are not intended to replace the need for interdisciplinary team members and decision-makers to directly review all responses and comments. Database reports by topic area allow systematic review of all public responses by subject area. Given the rapidly expanding volume of responses during comment periods due in part to increasing public interest and the widespread use of email, this process can greatly enhance methodical review of comments and meet our goal to continually improve decision-making and responsiveness to the public.

## **Considering Different Types of Comments under the National Environmental Policy Act**

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

The NEPA requires that after we consider comments, we formally respond to substantive comments. However, the nature and extent of each response depends on the type of concern identified.

We classified comments, or the concerns identified from them, as either those that fall within the scope of decision-making for the plan revision or those that fall outside of the scope for any number of reasons described below. Generally, the types of comments received, and concerns identified, that were considered out of scope include those that:

- Do not address the purpose, need, or goals of the Wasatch-Cache National Forest 2003 Forest Plan Revision (e.g. propose an action in areas beyond the Wasatch-Cache National Forest jurisdiction or that are not directly related to the action proposed in the plan, or relate to day-to-day operational issues such as law enforcement procedures or road maintenance).
- Address concerns that are already decided by federal law or national policy.

- Suggest an action not appropriate for the current level of planning (site-specific decisions to construct new roads, campgrounds or facilities, to offer special use permits or the sale of timber resources).
- Propose untenable restrictions on management of the forest or conflict with approved plans not being revised in the forest plan revision process.
- Did not consider reasonable and foreseeable negative consequences.

We further classified comments within the scope of the plan as either substantive or non-substantive. Based on the Council of Environmental Quality's regulations, a substantive comment is one that:

- Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement.
- Questions, with a reasonable basis, the adequacy of environmental analysis as presented.
- Presents reasonable alternatives other than those presented in the DEIS that meet the purpose and need of the proposed action and address significant issues.
- Cause changes or revisions in the proposal.

Non-substantive comments, or concerns identified from them, include those that simply state a position in favor of or against an alternative, merely agree or disagree with Forest Service policy, or otherwise express an unsupported personal preference or opinion.

We are required to respond only to substantive comments or the concerns identified from them. We have chosen to respond to all public concerns identified during analysis of public comment, within and out of scope, substantive and non-substantive alike. Responses to out of scope concerns are generally restricted to explaining that the concern is out of scope and does not merit further attention. A more elaborate answer may have been provided for clarity. Responses to substantive concerns are typically more extensive, complete, and most importantly, offer an explanation of why or why not and where the concern may have resulted in changes to the plan or analysis. If several concerns are very similar, they have been grouped for response purposes. Public concerns that identified editorial or other errors in the presentation of information in the DEIS were used to revise text and make corrections for the FEIS.



## Agency Response to Comments

As described in the previous section, each public concern statement was derived from one or many individual public comments. However, these supporting sample comments have been deleted here due to space constraints. Our interdisciplinary team reviewed the actual letters, public concern statements and the supporting comments in the preparation of our responses. Interested parties may consult the full CAT reports and the reading file of original response letters on file at the Supervisor's Office in Salt Lake City, UT.

Public concern statements and our responses are organized by section to mirror the order of the **final environmental impact statement** (FEIS) by topic area.

## Planning and Decision Processes

### Adequacy of the Document

#### Document Organization and Layout

1. **The Wasatch-Cache National Forest should be congratulated for the clarity of its planning document.**  
**Response:** Thank you.
2. **The Wasatch-Cache National Forest should continue to improve planning document by providing a more detailed table of contents or an index.**  
**Response:** Every effort was made to write in plain English and to use charts and maps to more effectively present information. We have worked to improve the clarity in the draft environmental impact statement. We have now added a listing of all tables and figures and created a more detailed table of contents.
3. **The Wasatch-Cache National Forest should produce a cross-walk document to clarify the relation between the current and the proposed Forest Plan, with potential impacts listed for each change.**  
**Response:** Alternative 4 represents the 1985 (current) Forest Plan as amended. To the extent possible, differences between Alternative 4 can be compared with Alternative 7, which has been developed in the Revised Plan. Many of the standards and guidelines contained in the 1985 Plan are site-specific direction that is inappropriate for programmatic type documents. The revised forest plan is based on a framework strategy so a one-to-one correlation from one to the other is not possible.
4. **The Wasatch-Cache National Forest should improve the quality of planning document maps.**
  - 4.1 **Provide sufficient detail for site-specific travel analysis by the public.**
  - 4.2 **By increasing readability**

#### **4.3 By using more color**

**Response:** We believe the detail of our maps is appropriate for the broad scale type of planning such as the revised forest plan. Site-specific travel planning for roads and trails is a future analysis, not a part of the forest planning analysis. Because of this we don't see the need for more detailed maps addressing this need. Recreation Opportunity Spectrum maps portray the six broad classes of opportunities, not the management of every trail and road.

Printing color maps with the draft EIS was very expensive. We continually evaluate the balance between spending federal dollars wisely versus communicating proposed forest direction. Color maps showing management prescriptions by alternative can be viewed in the complete documents package, on a CD or our website. Color maps are included as part of the Revised Forest Plan.

**5. The Wasatch-Cache National Forest should number and reference all plates in the final Forest Plan.**

**Response:** We have titled and referenced the oil and gas maps that you refer to as plates.

**6. The Wasatch-Cache National Forest should correct errors in the plates included in the draft Forest Plan.**

**Response:** Errors have been corrected. Corrected maps are available in the FEIS and Plan complete sets, on CD-ROM and posted on the internet.

**7. The Forest Plan should include Figure 2-1 as referenced in the text.**

**Response:** The Figure has been properly labeled and referenced in the text.

**8. The final Forest Plan should include Revision Topic 11 as referenced in the text.**

**Response:** There are 10 revision Topics. This paragraph has been edited to clarify the number of topics.

**9. The Wasatch-Cache National Forest should edit the poorly written "Response to Issue 5" section in the draft Forest Plan.**

**Response:** We have edited this section.

**10. The Wasatch-Cache National Forest should improve the organizational structure of Chapter 5.**

**Response:** We have improved the layout and structure of the Chapter 5 in the Revised Forest Plan. The monitoring section is part of the forest management direction of Chapter 4. The process management direction section has been reformatted and moved to an Appendix X called Implementation Guidance.

## General Adequacy

- 11. The Wasatch-Cache National Forest should expand and quantify effects analysis discussions throughout the Final EIS by replacing the extensive reliance on professional opinion.**

**Response:** Planning for a unit of the National Forest System involves two levels of decisions. The first is the development of a Forest Plan that provides direction for all resource management programs, practices, and protection measures. The second level of planning involves analysis and implementation of management practices designed to achieve goals and objectives of the Forest Plan. This level involves site-specific analysis to meet NEPA requirements. By the very nature of programmatic planning it is impossible and inappropriate to quantify site-specific effects. Since the Forest Plan is a broad framework, which does not directly commit to development, there are inherent limitations in predicting what development, and consequently what effects, will actually occur. When we have relied on science to support our analysis, it has been cited. In some cases, however science is simply not available and we must rely on the professional judgment of resource specialists.

- 12. The Wasatch-Cache National Forest should better balance the effects analysis of management activities by changing biased statements that exaggerate the benefits of active management.**

**Response:** We have improved watershed and wildlife sections to more fairly evaluate the effects of active management.

- 13. The Wasatch-Cache National Forest should properly account for and mitigate cumulative effects.**

**Response:** In reviewing the adequacy of the cumulative effects analysis in the EIS, it's important to acknowledge that the cumulative effects for a forest plan are quite different than those of a site-specific action. We have expanded the discussion of other agency actions and private land effects in Chapter 3 of the FEIS to the degree that is appropriate in a programmatic document. In addition because the Plan does not make an irretrievable commitment of resources, we are not relying on mitigation measures to reach a Finding of No Significant Impact.

- 14. The final Forest Plan should not rely on best management practices (BMPs) to mitigate cumulative environmental effects because this is insufficient to ensure compliance with the Clean Water Act**

**Response:** We feel that BMPs, standards and guidelines, and soil and water conservation measures are effective means to reduce adverse effects from site-specific project implementation. The revised Forest Plan does not propose site-specific projects of which mitigation measures could be proposed, but provides for broad-scale planning. At this scale of planning, the revised Forest Plan identifies BMPs, standards and guidelines, and soil and water conservation measures as ways the WCNF can use to reduce adverse effects of site-specific projects. Projects that implement the revised Plan may use mitigation measures to reduce adverse effects and it is at this point that effectiveness of mitigation measures should be evaluated.

The Forest Plan assumes that BMPs will be used during project implementation to reduce impacts from a site-specific project.

For their respective states, Utah and Wyoming have authority to determine compliance with the CWA. The State of Utah provides the authority to use BMPs to control nonpoint sources of pollution as stated in section 3.2 High Quality Waters – Category 1 in section R317-2-3. Antidegradation Policy, in R317-2, Utah Administrative Code (FEIS reference: Utah, State of. 2000a).

**15. The Final EIS should include an analysis of risks from private lands that affect the health of the forest and adopt a more conservative strategy in the Forest Plan**

**Response:** We agree that the adjacency of private lands to the Forest and their development contribute to effects on national forest system lands in varying degrees. We have expanded the discussion of other agency actions and private land effects in Chapter 3 of the FEIS to the degree that is appropriate in a programmatic document. As we developed the forest plan it was always with an awareness of the context of the forest and private lands.

## **Public Involvement and Collaboration**

### **Public Information**

#### **Accessibility of Information for the Public**

**16. The Wasatch-Cache National Forest should recognize that complex changes to management prescription categories between scoping and draft have made meaningful public comment difficult.**

**Response:** We agree the definitions of management prescription categories have evolved since they were first introduced in the preliminary AMS. Much of this change was the result of incorporating public comment and adapting to national initiatives. We recognize their application and interpretation in each alternative does require thoughtful analysis. However, because of this we specifically included very detailed tables of allowed activities with each alternative description in Chapter 2.

#### **Use of Information in the Decision Process**

**17. The Wasatch-Cache National Forest should base its decision on sound science.**

**Response:** Sound science should always be the basis for decisions. However, often, science is simply not available for many of the decisions we make. In some cases there are differing scientific opinions and no one definitive answer exists.

**18. The final Forest Plan should state that all accompanying technical documents will undergo external peer review.**

**Response:** The level of scientific scrutiny requested is not a requirement of the 1982 implementing regulations for the National Forest Management Act. Many of

the technical documents that were relied upon in our analyses are those published in scientific journals. The planning team has used the best available information to conduct their analyses

### **Public Involvement Efforts**

**19. The Final EIS should evaluate the effects of multiple planning processes on public involvement.**

**Response:** We recognized the demands placed on the public because of the many national and local planning efforts that were ongoing during our 4-year revision process. Because of this we included extended periods for public response when possible, such as a 5-month review period for the DEIS.

**20. The Wasatch-Cache National Forest should continue its extensive public outreach efforts.**

**Response:** We view public outreach as very important and plan to continue our efforts.

**21. The Wasatch-Cache National Forest should expand its outreach efforts with motorized recreationists to improve support for travel management decisions.**

**Response:** We are always striving to improve public outreach so those affected by management decisions participate in their formulations and understand and are fully aware of them when they are implemented. Organizations representing special interests provide an excellent opportunity to increase our outreach. We do have to balance our outreach efforts with available personnel, time, and expense.

**22. The Wasatch-Cache National Forest should eliminate its bias toward commercial interests in its consultations with stakeholders.**

**Response:** We do not feel that we are biased in our conversations with commercial interests. We often ask questions of our constituents to characterize the current condition from their point of view. We always acknowledge the source of our information.

**23. The Wasatch-Cache National Forest should improve outreach efforts to out-of-state residents by holding informational planning meetings at the ski resorts.**

**Response:** Skiers, often out of state residents, represent a unique situation for public outreach. Many receive information in the mail and respond in writing. In the past informational meetings held at the ski resorts have been poorly attended since most visitors are more interested in leisure activities. Ski area permittees often distribute material to their guests. Our mailing list reveals out of state addresses, many whom are skiers.

**24. The Wasatch-Cache National Forest should improve outreach efforts to Hispanic residents during Forest Plan implementation and future planning by publishing documents and holding meetings in Spanish.**

**Response:** We agree this is an increasing segment of our society that requires a specialized approach.

- 25. The Wasatch-Cache National Forest should not allow intimidation at public meetings by disallowing inflammatory threats of closure violations and accusations of terrorism by environmentalists.**

**Response:** We too regret that some members of the public felt their safety was being threatened. While we did have law enforcement present at those meetings it did not stop the confrontational attitude of some members of the public. We felt if we had taken a more aggressive stance, we may have incited violence.

- 26. The Wasatch-Cache National Forest should not schedule meetings during hunting season.**

**Response:** There are so many segments of society that compose those interested in forest management, it is next to impossible to plan public meetings that don't conflict with someone's schedule. Public meetings were logically scheduled in relationship to the steps in the planning process.

#### **Use of Public Comment in the Decision Process**

- 27. The Wasatch-Cache National Forest should provide clear guidelines on how to write effective comments.**

**Response:** We recognize with such a comprehensive set of documents, such as the revised forest plan, it is extremely difficult to know where to focus one's review. You make a good suggestion to consider when releasing future planning documents for public review.

- 28. The Wasatch-Cache National Forest should make submitting email comments easier by providing a direct link from the website.**

**Response:** We published our e-mail address and received a large share of comments via the internet. Adding a link is an avenue we will explore.

- 29. The Wasatch-Cache National Forest should weigh public comments differentially.**

**29.1 By giving particular attention to comments submitted by college students**

**29.2 By giving greater weight to users who pay fees**

**29.3 By giving greater weight to comments from local residents**

**Response:** The Wasatch-Cache National Forest is a national resource and decisions regarding the management of this forest are made in conjunction with national as well as local concerns. There are many viewpoints within Utah and within the nation that the Forest must consider. All of these comments are valid and were reviewed and considered in the final documents.

- 30. The Wasatch-Cache National Forest should give equal weight to comments from out-of-state residents.**

**Response:** See response 29.

- 31. The Wasatch-Cache National Forest should establish a clear standard for consideration of public comment by prioritize detailed, scientifically-backed comments.**

**Response:** Every comment received was read and considered when developing the revised forest plan and FEIS.

- 32. The Wasatch-Cache National Forest should use misinformed public comments to frame its educational strategy for users.**

**Response:** All of the public comments received have been very instructive in where and how we need to focus our information and education strategy. Working with community groups and organizations is one way of spreading resource management messages. These activities are very important and will continue to be a tool used to spread information in the future. We included an objective in the Revised Forest Plan emphasizing the areas of our education efforts as we implement the Plan.

- 33. The Wasatch-Cache National Forest should not make the comment consideration process a vote.**

**Response:** We agree. Public comments are not considered votes when making a decision. Every substantive comment and suggestion has value whether expressed by one respondent or many. Public comments help us better understand the sentiment behind particular viewpoints and values, reveal new information previously not considered, and provide clear understanding of the implications of our decisions for various interests.

- 34. The Wasatch-Cache National Forest should consider broader public opinion.**

**34.1 Rather than just that of people who officially comment in writing**

**34.2 Rather than just that of people who are vocal in public meetings.**

**Response:** Please see the response to 33. Decisions made in the revised forest plan are not determined by public opinion. We have followed the NEPA and NFMA regulations that provide direction on solicitation of public input. It relies on those who make written and oral comments.

- 35. The Wasatch-Cache National Forest should establish better means of creating dialogue with the public rather than delayed summary responses to written and oral comments.**

**Response:** At this final stage of the revision planning process, we agree that responding in writing to comments is not very satisfying to either those who wrote the comments or for us as forest planners and managers. A written response to substantive comments is required by the implementing regulations of NEPA. During the previous phases of the planning process we felt that constructive dialogue was conducted between many parties. Individual conversations at open houses, discussions with organizations at their invitation and constituent phone calls were very informative. Open houses are planned shortly after the release of the decision. In addition, we look forward to having more dialogue at the local level for small-scale projects as the revised plan is implemented.

**36. The Wasatch-Cache National Forest should convene town meetings prior to finalizing the Forest Plan.**

**Response:** We agree that some type of meeting with engaged citizens is worthwhile and scheduled open houses shortly after releasing the decision.

**37. The Wasatch-Cache National Forest should canvass public opinion.**

**37.1 By taking a public opinion poll.**

**37.2 By surveying forest users.**

**Response:** Please see the response to 33. Decisions in the revised forest plan are not the result of a public opinion survey or a vote counting process in which the outcome is determined by the majority viewpoint.

**38. The Wasatch-Cache National Forest should provide specific responses to individual comments on the preliminary alternatives.**

**Response:** We have found that there is a common misperception among some members of the public that because the decision does not reflect their opinion then we have not considered their opinion. When making a decision we have to look at the broad array of comment, which is often conflicting, and then make a reasoned choice. Rarely do we make a decision that satisfies everybody. With a comprehensive effort such as forest planning, a response to every comment heard at every phase is an unwise use of planning resources. At the preliminary alternative phase, we believed planning team efforts were more wisely spent analyzing and incorporating comments instead of developing specific responses to individual comments.

**39. The Wasatch-Cache National Forest should not allow public sentiment to overrule environmental protection when damage is occurring from overuse.**

**Response:** We agree.

**Involvement of Interest Groups in the Planning Process**

**40. The Wasatch-Cache National Forest should consult with mountain bicycling organizations early in the summer travel management planning process.**

**Response:** All user groups should be involved in scoping efforts during future site-specific travel planning. Successful implementation of decisions often depends on involvement throughout the process.

**41. The Wasatch-Cache National Forest should consult with user groups before closing trails to them (ie. mountain bikers).**

**Response:** Being involved in future site-specific travel planning will allow user groups to voice their comments and be informed of decisions.



**42. The Wasatch-Cache National Forest should include motorized recreation planners on the interdisciplinary team and advisory boards.**

**Response:** We intend to include all interested parties including user groups and their representatives in future travel planning following the guidelines of the Federal Advisory Committee Act.

**Influence of Interest Groups in Decision-making**

**43. The Wasatch-Cache National Forest should not cater to special interest groups.**

**43.1 Environmental groups**

**43.2 “Eco-terrorists”**

**43.3 Influential private and corporate interests**

**43.4 Motorized recreational groups**

**Response:** Throughout the planning process there has been a broad array of public viewpoints expressed. Each point of view believes the opposing interests are receiving preferential treatment. This is simply not true. The planning team has met with any individual or group to discuss their concerns when a request was made. All of comments were reviewed and considered in the final documents.

**44. The Wasatch-Cache National Forest should determine what constitutes a special interest according to the group’s impacts on forest lands, giving the greatest consideration to those causing the least destruction.**

**Response:** We use the term “special interest” to help us understand the needs and demands of many varied forest users. Because of the many varied interests there is no normal use of the forest. The range of alternatives responds differently to each issue thereby gives greater consideration to one type of user versus another. Regardless of a person or groups’ interest all forest uses should be properly managed.

**45. The Wasatch-Cache National Forest should consider that special interest groups provided biased information to their members.**

**45.1 Motorized groups**

**45.2 Environmental groups**

**Response:** All comments were reviewed and considered in the content analysis process whether they appear to be based on misinformation or not. Comments that were apparently based factual errors or misinformation are responded to by correcting the error or by offering the agency’s position on the issue.

**46. The Wasatch-Cache National Forest should discount research conducted by environmental groups.**

**Response:** We generally use research from scientific journals. When information is used from non-scientific journals it is cited as such.

## Trust and Integrity

**47. The Wasatch-Cache National Forest should deal honestly with the public.**

**Response:** We agree honesty and integrity are vital for good relationships with the public. We also recognize that in any communication between two people there's a chance each may interpret conversations differently. Public feedback on these issues helps us recognize where we may communicate more clearly.

## Collaboration

### Public Partnerships and Volunteers

**48. The Wasatch-Cache National Forest should end all partnerships with private outfitters/guides because the forest should not be used for profit.**

**Response:** Outfitters and guides can help provide opportunities for forest visitors where special expertise, experience or equipment may be needed or offered to those without an outdoor skill base. We agree that outfitted opportunities must always be evaluated in light of public demands for an activity. Criteria to be used when considering outfitter and guide services can be found in the Appendix X describing Implementation Guidance.

**49. The Wasatch-Cache National Forest should provide environmental education programs in partnership with the Stokes Nature Center.**

**Response:** We agree. The Logan District staff is currently holding discussions with Utah State University and Stokes Nature Center regarding joint efforts concerning environmental education. We are open to proposals and are always looking for partners to deliver appropriate messages concerning and stewardship.

**50. The Wasatch-Cache National Forest should not refuse offers for volunteer programs from motorized groups.**

**Response:** While each volunteer opportunity needs to be evaluated on its own merits, user groups can offer opportunities for peer education and contribute to proper resource management. We are willing to work together in a cooperative setting to promote an accurate, consistent message.

### Interagency Collaboration – State

**51. The Final EIS should discuss the Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment document.**

**Response:** Please see Revision Topic 10 where we have discussed this long-term program to deal with wildland fire and hazardous fuels situation.

- 52. The final Forest Plan should provide greater detail about how collaboration with other government entities will be implemented by creating an interagency working group.**

**Response:** The Forest Plan is a broad framework for the management of a National Forest. How further collaboration could be enhanced and expanded is more appropriately left for future implementation efforts.

- 53. The Wasatch-Cache National Forest should work with the State of Utah to enlarge the recreational motorized vehicle tag format so that the public can read license numbers of violators.**

**Response:** We agree that enforcement issues related to ATVs are important; however, your suggestion is outside the scope of our authority.

- 54. The Wasatch-Cache National Forest should work with the State of Utah to coordinate motorized recreation management with the use of the state trail ranger programs.**

**Response:** We coordinate extensively with the Division of Parks and Recreation. We have competed successfully numerous times for trail-building grants. In the wintertime we work together on providing snowmobile opportunities through grooming projects.

- 55. The Wasatch-Cache National Forest should remove the incorrect statement that wildlife reintroductions are carefully and openly planned.**

**Response:** The sentence you refer to is from the desired condition section of the forest plan. Because the Forest Service has the responsibility to prevent damage to resources on national forest system lands, it is our intent to work more closely with the Division of Wildlife Resources as they plan wildlife introductions that affect national forest system lands. We endorse public involvement for wildlife reintroductions.

- 56. The final Forest Plan should require independent scientific review of native wildlife determinations conducted by state agencies.**

**Response:** Your request is outside of our authority as determined in Forest Service Manual 2641: The state has the responsibility to make the determination as to which wildlife and fish species are native or indigenous.

- 57. The Wasatch-Cache National Forest should only cooperate with the Utah Division of Wildlife Resources when management is science-based.**

**Resource:** We recognize that sometimes science is not definitive and differing opinions exist. Because our responsibilities are so intertwined, cooperation with state agencies is necessary and desirable.

- 58. The Wasatch-Cache National Forest should work with the state wildlife agency to eliminate the use of lead shot in the forest.**

**Response:** Your request is outside of our authority. However, for your information according to 2002-2003 Utah Waterfowl Proclamation, only nontoxic shot may be

in possession or used while hunting waterfowl or coot in any area of the state and federal refuges (R657-9-10 and CFR 20.21(j)).

- 59. The Wasatch-Cache National Forest should work with the State Division of Wildlife and Natural Resources to monitor and encourage wolf migration onto the forest.**

**Response:** A wolf that was trapped in 2002 in the Cache Box Elder Management Area indicates the possibility of more wolves migrating to Utah. If wolves return to Utah they will be under the control of the U.S. Fish and Wildlife Service (FWS) and managed as a threatened species. All activities concerning the wolf would be done through the consultation process with the FWS as outlined in the Endangered Species Act, Section 7. Protection of the regionally significant wildlife corridor as provided in Alternatives 1, 2 3, 6, and 7 makes it possible for many different species to migrate

#### **Interagency Collaboration – County and Local**

- 60. The final Forest Plan should include a goal stating the Forest Service's intent to comply with local zoning regulations.**

**Response:** It is our policy to work with local governments and make very effort to meet the intent of zoning ordinances even though we are not legally required to do so.

- 61. The Wasatch-Cache National Forest should eliminate the bias established due to cooperating agency status for Uinta County.**

**Response:** Uinta County was granted cooperating agency status because they had special expertise to provide to the planning effort. They have been granted the rights as afforded them in the CEQ regulations implementing NEPA.

- 62. The Wasatch-Cache National Forest should prioritize the cooperating agency status for Uinta County.**

**Response:** See Response 61.

#### **Interagency Collaboration – Multi-Jurisdictional**

- 63. The Wasatch-Cache National Forest should work with other land managers and adjacent landowners to restore the entire region to properly functioning condition.**

**Response:** We agree and to the extent we can have been working towards that goal. As an example we have been working with an adjacent landowner, Deseret Land and Livestock, in a joint prescribed burn project. The State of Utah also has large blocks of land that lend themselves to joint projects.

- 64. The Wasatch-Cache National Forest should coordinate management activities with state and private landowners.**

**Response:** Yes, we agree and will continue to do so at the project level.

- 65. The Wasatch-Cache National Forest should work with the state Division of Natural Resources and county commission to eliminate hunting in the Tri-Canyon area, especially of moose.**

**Response:** This is a decision that is outside of the scope of Forest Planning (see chapter 1 of the FEIS). Members, of the Wildlife Board, set hunting regulations. Representatives from public land management agencies participate on Regional Advisory Councils who then make recommendations to the Wildlife Board. It is through this avenue hunting in the Tri-canyon area is regulated.

#### **Multi-Jurisdictional Planning with Adjacent National Forests**

- 66. The Wasatch-Cache National Forest should reanalyze the High Uintas Roadless Area as one contiguous planning area in conjunction with the Ashley National Forest.**

**Response:** Ideally the planning efforts for both forests would have been scheduled during the similar time frames. Each forest had its own set of unique circumstances that dictated when each would undertake forest plan revision. We have brought forward the direction from the High Uinta Management Plan that was completed jointly with the Ashley National Forest in 1994.

- 67. The Wasatch-Cache National Forest should work with particular national forests.**

**67.1 Work with the Caribou National Forest toward wilderness designation for Franklin Basin**

**67.2 Work with the Uinta National Forest toward recommended extensions to the Lone Peak Wilderness**

**67.3 Work with the Uinta National Forest to establish consistent requirements for the Snowbird Ski area**

**Response:** Within the range of alternatives analyzed in the Caribou EIS and in the Uinta EIS, recommendations for additional wilderness in Franklin Basin and Lone Peak respectively were considered. In the revised Plans the Uinta and Wasatch do not provide for permit boundary additions in Lone Peak. A sliver of 400 acres north of Mt. Naomi to the state boundary is recommended for wilderness consistent with the wilderness recommended by the Caribou National Forest.

Coordination between the Uinta and Wasatch-Cache for Snowbird Ski Area is best conducted at the Master Development Plan stage.

- 68. The Wasatch-Cache National Forest should work with all adjacent forests to assure consistent management prescription categories and allocations to achieve landscape-level wildlife connectivity.**

**Response:** The three adjoining forests that are currently revising their forest plans all have very similar management prescriptions. Their application to the ground varies because of the differing capabilities of the landscape and the needs and values of the distinctive populations each serves. Also see Response to 59.

- 69. The Wasatch-Cache National Forest should work with all adjacent forests to assure consistent travel management plans.**

**Response:** We did to the extent appropriate given the often-differing set of circumstances unique to each forest.

## **Relationship to Other Planning and Rulemaking Processes**

### **Roadless Area Conservation Rule**

- 70. The Wasatch-Cache National Forest should issue a supplement to the Draft EIS to explain new Roadless Area Conservation Rule interim directives.**

**Response:** The interim directives simply include the Chief's instructions that Forest Plan revisions consider, as appropriate, the long-term protection and management of unroaded portions of inventoried roadless areas. The Forest has considered the values of each roadless area in the FEIS.

- 71. The final Forest Plan should protect roadless areas in a manner consistent with the Roadless Area Conservation Rule.**

**71.1 Regardless of the Rule's status**

**71.2 On the Logan Ranger District**

**Response:** We are applying the Chief's June 7, 2001 direction (incorporated into interim directives) as the overarching guidance for managing inventoried roadless areas in the Revised Forest Plan. It has applied protection similar to the Rule, to some roadless areas while others it has not. On the Logan Ranger District the majority of roadless areas are managed to maintain or mostly maintain roadless values.

- 72. The Wasatch-Cache National Forest should not manage roadless areas according to Roadless Area Conservation Rule direction.**

**Response:** The terms of the Roadless Area Conservation Rule are not applied to Alternatives 3, 4, 5 and 7. Other alternatives consider the protection and management of inventoried roadless areas by applying terms of the Rule. All give full consideration of the values of inventoried roadless areas on the forest.

- 73. The final Forest Plan should adopt the "outside roadless area" use tables.**

**Response:** See Response 71.

- 74. The final Forest Plan should define "likelihood" of degrading roadless characteristics in a scientific manner.**

**Response:** Display of effects to roadless area values has been expanded in the final EIS. A programmatic analysis such as that in forest planning cannot analyze any specific on the ground effects. This disclosure must come at the project level analysis when a site-specific action is proposed.

- 75. The final Forest Plan should explicitly state whether road construction is permitted by management area prescription in the allowable use tables.**

**Response:** The Revised Forest Plan includes standards and guidelines by management prescription that state whether or road construction is allowed.

- 76. The final Forest Plan should establish its own strong protection of roadless areas independent of the national roadless rule by assigning all areas to 1.5, 2.6, or 4.1.**

**Response:** The Revised Forest Plan protects inventoried roadless area values to varying degrees. Please refer to Table RW-9 under Topic 5 in Chapter 3 of the FEIS.

- 77. The final Forest Plan should state that it is not required to comply with the Roadless Area Conservation Rule pending resolution of legal challenges.**

**Response:** In Chapters 1 and 2 of the FEIS we have explained the current status of the Roadless Area Conservation Rule. In Alternative 7 that has been developed as the Revised Forest Plan, we are applying the Chief's June 7, 2001 direction as the overarching guidance for protecting inventoried roadless areas. This direction has been incorporated into Forest Service Interim Directive No. 1920-2001-1. Once a judicial ruling has been made or some further regulations for roadless area management decided upon, we would follow that direction.

- 78. The final Forest Plan should state that inventoried roadless areas will not be subject to any restrictions beyond the assigned management prescription category.**

**Response:** They will be subject to management direction contained in the revised Forest Plan and any applicable agency policy.

- 79. The final Forest Plan should comply with the Chief's interim directives.**

**Response:** It does. The Chief has instructed forests to ensure that Forest Plan revisions consider, as appropriate, the long-term protection and management of unroaded portions of inventoried roadless areas. He also stated in the policy that as a general rule inventoried roadless areas should be managed to preserve their roadless characteristics until a forest scale roads analysis is completed and incorporated into a forest plan. This has been done. Inventoried roadless areas are protected in Alternatives 1, 2, and 6. Other alternatives consider the protection and management of inventoried roadless areas by varying degrees. All give full consideration of the values of inventoried roadless areas on the forest.

## **Legal and Administrative Framework**

- 80. The final Forest Plan should include standards that define whether categorical exclusions can be used when extraordinary circumstances are present.**

**Response:** An agency final interim directive was published in the Federal Register on August 23, 2002 that addressed this issue. Direction such as this is most appropriately addressed in agency handbooks and manuals.

## The Forest Planning Process

### Purpose, Need, and Significant Issues

#### Revision Topics

- 81. The Wasatch-Cache National Forest should expand the roadless area issue discussion to emphasize ecological integrity and inherent values because recreation is over-emphasized.**

**Response:** The examination of roadless areas was expanded considerably between the Draft and Final EIS to consider each area's values individually, in broader contexts, and for values in addition to recreation. See Appendices C-1, C-2 and the Topic 5 discussion in the FEIS.

### Decisions Made in Forest Planning

#### Scale of Decisions

- 82. The final Forest Plan should clearly define the difference between significant and non-significant Forest Plan amendments.**

**Response:** Forest Service Manual section 1922.5 defines the difference between non-significant (1922.51) and significant (1922.52) amendments. These sections are cited below and further define more general direction established in the planning regulations, 39 CFR 219.10 (f).

1922.51 - Changes to the Forest Plan That Are Not Significant. Changes to the forest plan that are not significant can result from:

1. Actions that do not significantly alter the multiple-use goals and objectives for long-term land and resource management;
2. Adjustments of management area boundaries or management prescriptions resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management; and
3. Minor changes in standards and guidelines.
4. Opportunities for additional management practices that will contribute to achievement of the management prescription.

The Forest Supervisor must prepare an amendment to the forest plan to accommodate a change determined not to be significant. Appropriate public notification is required prior to implementation of the amendment.

1922.52 - Changes to the Forest Plan That Are Significant. The following examples are indicative of circumstances that may cause a significant change to a forest plan:



1. Changes that would significantly alter the long-term relationship between levels of multiple-use goods and services originally projected (36 CFR 219.10(e)); and
2. Changes that may have an important effect on the entire forest plan or affect land and resources throughout a large portion of the planning area during the planning period.

When a significant change needs to be made to the forest plan, the Forest Supervisor must prepare an amendment.

Documentation of a significant change, including the necessary analysis and evaluation should focus on the issues that have triggered the need for the change. In developing and obtaining approval of the amendment for significant change to the forest plan, follow the same procedures as are required for developing and approving the forest plan (36 CFR 219.10(f) and 36 CFR 219.12).

### Management Direction

**83. The Wasatch-Cache National Forest should produce a high-quality, strong Forest Plan in order to face real issues in the region.**

**Response:** We believe that through this planning process the key issues for forest plan development at this time and place have been identified, and that the resulting plan presents strategies for their treatment. The degree of detail with which the revised forest plan treats these issues through allocation to prescriptions, standards and guidelines, goals and objectives and monitoring is intended to be at appropriate scales given the nature of the issues and affected resources. We think the revised forest plan is a high quality product, but at the same time is by no means perfect. We think that the forest planning process is continuous, and that amendments will be needed and welcome as new information is developed and new issues arise.

**84. The Wasatch-Cache National Forest should remedy its failure to shift from emphasizing utilitarian values to ecosystem preservation and recreation values to mirror changes in society.**

**Response:** We recognize the diverse opinions related to how the forest should be used. Different segments of society have different values and interests. Strong opinions are expressed by majorities or minorities, of the overall population, on various issues. However, the planning and NEPA process are not a referendum or vote, and we have no accurate information on the numbers of people who take up opposite positions on issues. The forest plan is a complex set of decisions intended to serve all of society, while protecting the values of the federal lands and their elements as required by law.

**85. The Wasatch-Cache National Forest should use the precautionary principle in the final Forest Plan because of lack of species trend data.**

**Response:** The FEIS has added analysis and information beyond what was provided in the DEIS. Consideration of lynx and other species is expanded in the FEIS. Additionally, Lynx Analysis Units (LAU) have been mapped and were considered along with other information on lynx in the FEIS. These LAU maps are on file with the forest. Some species of carnivores are not considered in as great detail (egg. pine marten and black bear) either because they are not at risk or their distribution is limited on the forest and local issues related to them are not critical. New information on individual species is presented in Appendix J – to the FEIS on Management Indicator Species. Information on presence/absence and some trend information are presented. Decisions in the forest planning process use the best information available.

**86. The Wasatch-Cache National Forest should be proactive in addressing the immediate overuse problems facing the Tri-Canyon area and write a separate crisis plan for this area.**

**Response:** Forest leadership and forest plan interdisciplinary team carefully considered a specific objective to plan focused on the Tri-Canyon area; see Forestwide Objective 19 in the Proposed Forest Plan (May 2001, pg. 4-20.) This objective did not survive in the revised forest plan given hard choices for where to emphasize future work. However, several identified objectives in the revised forest plan will add proactively to Tri-Canyon management, to bring vegetation within historic range of variation, to treat urban-interface fuels, to better manage dispersed camping, and to continue development of the Bonneville Shoreline and Great Western Trails. Also, considerable additional focused direction for the Tri-Canyon area is provided in the desired future conditions section on the Central Wasatch Management Area.

**87. The Wasatch-Cache National Forest should write strict standards and guidelines specifically addressing the Tri-Canyon Forest in the new Forest Plan to avoid degradation from lack of management.**

**Response:** The forest wide standards and guidelines for soil and watershed in the revised forest plan, the Clean Water Act, and state and county standards for water provide substantial limits on how much degradation is possible. We think that the Tri Canyon area, while directly adjacent to and used by a large urban population, can be protected adequately by these standards.

**88. The Wasatch-Cache National Forest should frame management direction of the Logan Ranger District on watershed and critical wildlife corridor values in order to meet the purpose and need.**

**Response:** Much of the desired future condition section for the Cache-Box Elder Management Area was developed with the protection of the Logan River watershed and north-south Bear River Range wildlife corridor in mind. See Watershed and Wildlife Habitat sections in that part of Chapter 4 in the revised Forest Plan.

**89. The Wasatch-Cache National Forest should verify that final Forest Plan language reflects the management direction of the new Administration.**

**Response:** The Wasatch-Cache National Forest and Intermountain Region receive direction and policy updates from our Forest Service Washington Office (WO) and the current administration on a regular basis. Draft forest planning documents are reviewed by the regional and WO prior to making a final decision, and forest policies must be compatible with direction from these management levels and the current administration.

**Forest Plan Elements General**

**90. The Wasatch-Cache National Forest should clarify and strengthen vague direction in the proposed plan to reduce excessive management flexibility.**

**Response:** The revised forest plan has tried to identify a trim and realistic set of management direction that can guide future management and set user expectations as to how management will operate. As the comment infers, some management flexibility and local ad hoc decision-making authority are recognized as essential to any organization that must plan project work, do daily work or respond to crises. The forest plan includes several kinds of management direction (DFCs, standards, guidelines, goals, objectives, and monitoring) all of which must be integrated and considered in implementing overall management for all or part of the forest. The revised forest plan sets standards where needed to protect key resources from overuse and so that desirable resource trends can be established. Standards that are perceived by some as tying the hands of local managers can be seen as excessive management flexibility to others.

**91. The final Forest Plan should provide detailed descriptions of desired future conditions in order to meet ecosystem goals.**

**91.1 For each management area**

**91.2 For all habitat types and resources**

**Response:** DFCs are written for each management area and forestwide for an array of resources and uses; see Chapter 4 in the revised Forest Plan. Similarly, the forestwide goals for different resources identify longer-term situations and settings that the plan intends to trend toward. Included in for the management area DFCs and in the goals are statements regarding uses, vegetation settings, wildlife habitats, watershed and soils, and other items.

**92. The Wasatch-Cache National Forest should more effectively integrate desired future conditions for each resource to those for management areas as a whole.**

**Response:** Desired future conditions (DFC) statements were written for management areas in the DEIS to apply to Alternative 6, and were rewritten as needed in the Final Plan. Forestwide resource DFCs were also rewritten as needed to make the whole plan more integrated. While management areas are not as large as the whole forest, they still are major tracts of the forest. Our rationale is that these management areas have some integrity from both social and physical geographic perspectives. The amount of detail and specific foci in a desired future

condition statement is related to several factors, some of which are: the decisions the forest plan is making, the issues for the management area and related larger and smaller contexts of consideration (forestwide or larger), scientific and management perspectives of the team writing the DFC. We recognize that the DFCs as written may seem like overkill to some (too narrowly defining of what may occur in an area), and lacking to others (not detailed enough regarding particular drainages, issues, development opportunities or prohibitions), both from social or physical/natural perspectives. We think, however, that the forestwide resource DFCs and management area DFCs provide enough emphasis on desired social and physical conditions related to the issues which need resolution, for managers and the public to see where management emphases for the planning period (next decade or more) should be. If more detailed definition of broad management is DFCs are needed, or if focus on subparts of the management area is needed, subsequent area assessments and planning may be undertaken.

**93. The Wasatch-Cache National Forest should more effectively link desired future conditions to anticipated management actions by placing more focus on commodity resource values.**

**Response:** The forest plan makes several decisions – desired future conditions, goals, objectives, standards, guidelines, management prescriptions, monitoring, timber allowable sale quantity, suitable rangelands, and makes recommendations for wilderness. The Forest Plan objectives stated in Chapter 4-A. 4 probably come closest to defining what management actions are likely to be taken in the near future. The forest plan is not required to provide detail on how these objectives or the other decisions will be implemented. In other words it states the “what and why” for the Wasatch-Cache over the next several years, but it does not state “how”. “How” these several decisions will be implemented is largely left up to the discretion of the forest supervisor and district rangers as they propose projects, (subject to NEPA process and with public involvement) and undertake daily activities to narrow the gap between the current condition and what is desired in the future.

Alternative 5 in the FEIS was provided for the decision maker to consider one that would emphasize commodity outputs.

**Goals and Objectives, Standards and Guidelines General**

**94. The Wasatch-Cache National Forest should add specific and measurable standards throughout the final Forest Plan to reduce excessive management flexibility.**

**Response:** See response to 90.

**95. The final Forest Plan should list prescription-specific standards and guidelines separately from forest-wide direction.**

**Response:** In the revised Forest Plan prescription-specific standards and guidelines have been developed for timber harvest, prescribed fire, wildland fire use,

snowmobiling, livestock grazing, road, trail and recreation construction, and other activities. See Chapter 4 B- Forestwide Allocations, Management Prescription Categories.

**96. The Wasatch-Cache National Forest should vary standards and guidelines by alternative and monitoring criteria.**

**Response:** We chose to keep standards and guidelines constant across alternative for three reasons. First, we think of standards as thresholds beyond which there should not be further use, i.e. limits to reasonable use beyond which adverse effects are likely. As such, standards ought not to vary for soil compaction, vegetation loss, etc. – regardless of what general goals or desired futures there are for an area. Second, varying standards across alternatives would have made the analysis of alternatives even more complex than it has already become, without much perceived benefit. Third, keeping standards equal across alternatives allows standards to be a controlled constant across the analysis.

**97. The Wasatch-Cache National Forest should change the frequency of visitor satisfaction surveys in Objective 23 to two-year intervals.**

**Response:** The objectives in the revised Forest Plan have changed considerably since the DEIS and proposed Forest Plan were distributed in May 2001. Objective 23 has been dropped, and no other objective addresses frequency of visitor satisfaction surveys. The Forest Service has recently developed a national program for monitoring and sampling recreation use and satisfaction. The survey of Wasatch-Cache recreation will commence in the fall of 2002 and run for 1 year. Results of this yearlong survey should be available in early 2003. It is expected that this recreation survey will be conducted every five years to develop long-term information on recreation.

## **Management Prescription**

### **Management Prescription Category Development General**

**98. The Wasatch-Cache National Forest should develop a broader range of management prescription categories to better manage individual activities to include a back-country designation.**

**Response:** Management prescriptions 4.1 and 4.3 both can be considered “backcountry” recreation prescriptions. Management Prescription 4.1 is a non-motorized prescription, while the 4.3 prescription allows motorized use. For full descriptions on these management prescriptions see Chapter 4 in the revised Forest Plan.

**99. The Wasatch-Cache National Forest should place the greatest emphasis on management prescriptions instead of management areas.**

**Response:** Management prescription categories have been used by several regions in the Forest Service to generally describe what activities might occur or be limited on subareas of forests. They are a “shorthand” tool for looking at management for

delimited areas. The application of these prescriptions is a forest plan decision. Interpretation of how the prescription should be implemented through particular projects is specific to the site characteristics and local issues related to the implementation. Management prescriptions are only one part of overall plan direction, and should not be considered without also thinking about how standards and guidelines apply in the local setting, how the prescription relates to the goals and objectives of the plan and the desired future conditions for the management area. An analogy: Think of management prescriptions as a fork. It's hard to do a thorough and neat task of eating a meal (the forest) without also having a plate (management areas), spoon (goals and objectives), knife (standards and guidelines) and a napkin (monitoring.)

### **Management Prescriptions General**

- 100. The Wasatch-Cache National Forest should eliminate the word “generally” from all management prescription category descriptions to reduce excessive management flexibility.**

**Response:** We have eliminated the use of the word “generally” in our management prescription definitions to try to more clearly state what is allowed and what is not.

- 101. The Wasatch-Cache National Forest should reduce specificity in the management prescription categories to increase management flexibility.**

**Response:** Management prescription definitions have been rewritten to clarify what is allowed and what is not. Prescriptions are applied to an area of land to better help the local manager and public understand what practices should be applied and what uses and characteristics can be expected on a given landscape. In the 1985 Forest Plan no prescriptions were applied, providing little, if any direction for how subareas of the forest ought to be managed. The application of management prescriptions helps define the future of an area, but still leaves considerable implementation flexibility available to the manager and to an involved citizenry.

- 102. The Wasatch-Cache National Forest should re-evaluate management prescription categories on a district-by district basis to enable maximum flexibility.**

**Response:** We have reviewed management prescription on a district-by-district basis and believe that the range of alternatives, as cited in the FEIS, was sufficient to provide a high level of flexibility. The individual rangers and their staff also reviewed alternative 7. They believe that this alternative provides the flexibility they need to accomplish the Goals and Subgoals of the Forest Plan.

### **Allocation of Management Prescription Categories General**

- 103. The Wasatch-Cache National Forest should avoid using restrictive management categories.**

**103.1 Wilderness**

**103.2 Unroaded, roadless, or non-motorized**

**Response:** We understand that many users are not in favor of any protection of roadless values, non-motorized recreation, or wilderness recommendations on the Wasatch-Cache. Some alternatives provide for wilderness recommendations and maintenance of roadless values and others do not. No Wilderness is recommended in Alternatives 4 and 5. The discussion in Chapter 3, Topic 5 in the FEIS compares the extent to which roadless values are protected in each alternative. The decision-maker will have to weigh what is the best mix of winter motorized and non-motorized, protected roadless, and wilderness settings for the future.

**104. The Wasatch-Cache National Forest should overcome the institutional bias against wilderness designation that is evident throughout the draft Forest Plan.**

**Response:** The Forest Service must evaluate roadless areas for their Wilderness potential as required by laws and implementing direction. Public and internal opinions regarding the capability, availability, and need for more wilderness are weighed in the overall evaluation.

**105. The Wasatch-Cache National Forest should redesign allocations on the North Slope to eliminate the patchwork of conflicting uses.**

**Response:** Alternative 7 has been added to the array of alternatives after receiving comments on the DEIS. Other alternatives provide a range of possibilities designed to address the issues associated with this forest plan revision and guide the forest on different trajectories. What may appear in some alternatives to be a patchwork of conflicting uses to some is likely to be seen a good multiple-use programmatic direction to others. Projections of outputs from the different alternatives are provided that give a sense of what might be expected under management from the alternatives.

## **Implementation and Monitoring**

### **Implementation and Monitoring General**

**106. The Wasatch-Cache National Forest should measure and report specific results toward Forest Plan goals.**

**Response:** Forest plan monitoring is intended to show whether management under the plan is successfully moving the Wasatch-Cache closer toward the desired future conditions that are stated, or if there are problems. Our Chapter 5 section on Monitoring will focus on the extent to which the objectives identified in the forest plan are being accomplished, and whether that accomplishment is helping the forest trend as intended. Annual forest plan monitoring reports have been provided to the regional office. In the future some revamping of these of these reports is anticipated and they will be made available to the public on our website.

**107. The final Forest Plan monitoring section should include specific standards to define success or failure for each measurement indicator.**

**Response:** The forest plan monitoring section has been substantially changed since the publication of the DEIS and proposed Forest Plan in May 2001. In Chapter 5 of

the revised Forest Plan monitoring questions, measurement indicators, frequency of monitoring, and other monitoring criteria are identified. It is important that forest plan monitoring and project level monitoring be distinguishable. While there are clear relationships between the two, forest plan level monitoring is more programmatic and generally concerned with broader scale, while monitoring at project level is mostly likely more specific and focused.

**108. The Wasatch-Cache National Forest should collect adequate monitoring data to meet cumulative effects analysis requirements.**

**Response:** The choices made for monitoring items in the monitoring section are intended to provide a framework which can be further defined in response to changing conditions in annual monitoring and completed given available funding. Cumulative effects analysis in the FEIS is based on best available and applicable data at the time the document was prepared.

**109. The Wasatch-Cache National Forest should incorporate the cost of monitoring into all projects or refuse to approve them if funding isn't available.**

**Response:** We agree that project monitoring is an important responsibility, and its costs should be anticipated and budgeted during project development.

**110. The Wasatch-Cache National Forest should monitor the same activities under different environmental conditions rather than just once.**

**Response:** We do monitor BMPs and other indicators and standards under a broad variety of project situations. Part of our monitoring plan will be to sample a variety of projects in different areas of the forest to see if the forest is implementing direction as directed and trending as intended under the direction in the forest Plan. See the Monitoring section in Chapter 5 of the revised Forest Plan for details.

**111. The Wasatch-Cache National Forest should monitor the extent to which standards and guidelines are applied annually.**

**Response:** It is intended that all standards and guidelines are applied consistently. Many standards and guidelines are monitored annually, or regularly as implemented. Other forest plan monitoring and reporting are done at intervals of several years. Part of our monitoring plan will be to sample a variety of projects in different areas of the forest to see if the forest is implementing standards, guidelines, and other direction and trending as intended. The revised Forest Plan monitoring section in Chapter 5 details the frequencies of monitoring different items.

**112. The final Forest Plan should better define how desired future conditions will be achieved and how monitoring will be done for the western Uintas.**

**Response:** Chapter 4. A. 4. of the revised Forest Plan details several objectives in that will be undertaken over the course of the plan to move the forest toward DFCs. The detail for how these and other actions will be approached will be based on individual project proposals to implement the plan. Questions about how DFCs will be attained for vegetation, watershed, recreation, wildlife and other items defined in



the management area statements must be answered over time through project level implementation and monitoring both projects and overall performance under the plan.

## **Volunteers**

### **113. The Wasatch-Cache National Forest should make better use of volunteer labor from recreationists.**

#### **113.1 Off-road vehicle users**

#### **113.2 Mountain Bikers**

**Response:** The Wasatch-Cache does have an active program to incorporate volunteer work to enhance accomplishment of forest work. Volunteers have worked in recreation and trails projects, heritage resource (PIT) projects, range administration and monitoring, and a variety of other tasks. We welcome volunteers; their work takes time to supervise and coordinate, but it is of great value to us and worthy service to the community and for public lands. Volunteers may call the main desk at the Wasatch-Cache to inquire about opportunities.

### **114. The Wasatch-Cache National Forest should make better use of volunteer labor for monitoring non-recreational impacts.**

**Response:** See response 113.

## **Funding and Fees**

## **Funding**

### **115. The Wasatch-Cache National Forest should secure adequate funding for certain purposes.**

#### **115.1 For the Avalanche Forecast Center**

#### **115.2 For environmental analysis**

**Response:** Funding for a variety of functions that are closely linked to the Wasatch-Cache is often needed for their viability. Several partners including the Forest Service, Friends of Utah Avalanche Forecast Center, Utah State University, Salt Lake County, the State of Utah and others, fund the Utah Avalanche Center. Each of these partners recognizes the valuable service that is provided, and strives to apply support when at all possible.

Similarly, environmental analysis, in advance projects or planning, as required by law, is needed for quality work, and can take substantial funding to achieve. Often project proponents pay for environmental analysis, and partnering with other agencies to bear this cost is a good idea. The Forest Service is always looking for to bear the costs of project planning.

**116. The Wasatch-Cache National Forest should increase funding for seasonal ranger positions to add weekend shifts and Spanish speaking rangers.**

**Response:** Seasonal employees are a key to successful management of the forest. Funding for them is tight, and seems to be getting tighter as overhead costs go up. We do have Spanish-speaking seasonal employees working for us in recreation as well as other disciplines. These individuals are valued for their ability to communicate with the Spanish-speaking community and users. Hiring, deployment, and scheduling work for these individuals and other personnel actions are not part of forest plan decisions.

**117. The Wasatch-Cache National Forest should consider the financial impacts of wilderness designation on the state parks and recreation division.**

**Response:** To our knowledge, a decrease in licensing fees paid to a state for atvs and snowmobiles has not been linked to recommendations for wilderness in any state. In the State of Utah the numbers of these vehicles has continued to rise.

**118. The Wasatch-Cache National Forest should use oil and gas revenue for road maintenance.**

**Response:** Revenues from oil and gas development are committed to the treasury and to the states by laws, which define the mechanisms for their distribution and allocation. The Wasatch-Cache has no authority over how this is done.

**119. The Wasatch-Cache National Forest should work with the State of Utah to assure that off-road vehicle gas tax receipts are used directly for off-road vehicle recreation.**

**Response:** The Wasatch-Cache often applies for funding from the State of Utah to develop plans and funding for trails. The state has awarded monies nearly every year when the forest has projects that fall within their funding criteria. These monies are applied to both motorized and non-motorized recreation trails.

**120. The final Forest Plan should identify specific funding sources to meet its recreational site maintenance goals.**

**Response:** While general guidelines to seek partnerships or other means for funding or to decrease costs of administration, maintenance, operations, and monitoring may be appropriate in a forest plan, we think that identifying specific sources is not necessary and not within the scope of forest plan decisions.

**121. The final Forest Plan should identify specific funding sources to meet its range monitoring requirements.**

**Response:** See response 120.

**122. The Wasatch-Cache National Forest should allocate money to monitor the use of wilderness areas.**

**Response:** While budgets are always limited, some funding is spent each year to monitor wilderness use, both in the summer and winter. Additionally, a national visitor recreation use monitoring survey is being undertaken this year to improve

our understanding of recreation use on the forest (and in designated wildernesses.) Forest Plan level monitoring, see Chapter 5 of the revised Forest Plan, does identify questions that relate to recreation use and the extent of impacts to resources from recreation.

**123. The Wasatch-Cache National Forest should require all individuals and corporations profiting from forest lands to pay the full cost for management associated with their use.**

**Response:** Individuals and corporations that are permitted to operate on the national forest for profit are charged a use fee that is calculated based in part on the revenues of their operation. The agency is not required to cover the full costs of administration of the use, nor would that always be desirable. Permit fees and administration are not within the scope of the decisions made in forest plan revision.

## **Fees**

### **Fees General**

**124. The Wasatch-Cache National Forest should charge parking fees at lots.**

**Response:** The forest could elect to charge for parking at developed lots, which provide some services or meet some minimum development levels. While this might be desirable and return some money to the treasury and the forest, it is not a forest plan decision.

**125. The Wasatch-Cache National Forest should request a larger share of off-road vehicle registration fees for enforcement and mitigation.**

**125.1 Rather than new trail construction**

**Response:** See response 119.

**126. The Wasatch-Cache National Forest should address the fairness of imposing fees only on motorized recreationists.**

**Response:** We recognize the frustration of some motorized recreation users, who feel they are bearing a larger burden because of licensing fees associated with their vehicles. However, the question of fees for parking or licensing is outside the scope of forest plan decisions.

**127. The Wasatch-Cache National Forest should charge user fees according to the activity's impact.**

**Response:** Fees for grazing use are set by Congress and changing them is not within the authority of the Wasatch-Cache National Forest. Mitigation of impacts can be required in definition and administration of permits.

## Fee Demonstration Program

**128. The Final EIS should disclose more detailed accounting information on fee demonstration program receipts and expenditures.**

**Response:** Fee demo program decisions and the administration of the fee demo are not covered by the forest plan, and as such are not dealt with in this effects analysis or Forest Plan.

Detailed accounting for the fee demo program is provided on an annual basis, and reports are prepared which can be made available to the public. General summaries have been prepared for the Intermountain Region, and project by project reports are available on the forests.

**129. The Final EIS should analyze the effects of the fee demonstration program on low-income users.**

**Response:** See response 128.

**130. The Wasatch-Cache National Forest should expand the fee demonstration program locally as long as subsidized grazing is eliminated.**

**Response:** See response 128.

**131. The Wasatch-Cache National Forest should only extend the fee demonstration program to heavily used areas.**

**Response:** See response 128.

**132. The Wasatch-Cache National Forest should require all users, including non-motorized ones, to pay a license fee.**

**Response:** The establishment of use fees for areas or uses is not a decision that is within the scope of the issues related to this forest plan revision.

**133. The Wasatch-Cache National Forest should revamp the fee demo program.**

**133.1 Establish a sliding fee scale for lower income people**

**133.2 Create one annual pass in partnership with adjacent forests**

**Response:** See response 128.

**134. The Wasatch-Cache National Forest should implement the proposed fee demo site at Mueller Park.**

**Response:** See response 128.

**135. The Wasatch-Cache National Forest should make Big and Little Cottonwood Canyons fee areas.**

**Response:** See response 132.

**136. The Wasatch-Cache National Forest should not use Mirror Lake Highway fee demo funds to harden impacted dispersed camping sites because it encourages further damage.**

**Response:** The hardening of dispersed sites for resource protection or for recreation experience is a site-specific implementation decision that can be related to more general forest plan decisions (e.g. perhaps allocation of recreation management prescriptions or application of soil standards). Assessment of the relationship of damage, use, and local site conditions are all related to the site-specific condition of the case at hand and are not forest plan decisions. Paying for any hardening project can be done out of whatever funding is available and legal.

**137. The Wasatch-Cache National Forest should exempt campers at developed sites from fee demo charges.**

**Response:** See responses 128 and 132.

**138. The Wasatch-Cache National Forest should eliminate the fee demonstration project.**

**Response:** See response 128.

**Tollbooths**

**139. The Wasatch-Cache National Forest should install tollbooths at Big and Little Cottonwood Canyons.**

**139.1 To improve public environmental sensitivity**

**139.2 To educate the public about watershed protection**

**139.3 To help control the litter epidemic**

**Response:** Suggestions to increase sensitivity for environmental protection are valid and we believe education is a key element in an overall strategy for successful forest management. The Chapter 4 of the Forest Plan provides an objective that is specifically designed to deal with concerns regarding environmental sensitivity and enforcement, and several other objectives have public education elements within them. Tollbooths could be good contact points for dissemination of information about appropriate behavior on the forest. However, these are quite site-specific recommendations and are outside the scope of forest plan decisions.

**140. The Wasatch-Cache National Forest should install tollbooths at Big and Little Cottonwood Canyons to be operated during the summer season.**

**140.1 With a special access pass for residents and employees**

**140.2 With a portion of each ski lift ticket contributed in the winter**

**Response:** The recommendations are interesting but outside the scope of the forest plan decisions. These are site-specific and fee demo or cost recovery suggestions that are handled under different authorities and decisions.

**141. The Wasatch-Cache National Forest should redesign the tollbooth at Mirror Lake Highway to improve enforcement of the user fees.**

**Response:** See responses 139 and 140.

## Alternatives

### Alternative Development

#### Range of Alternatives

**142. The Wasatch-Cache National Forest should provide an adequate range of alternatives.**

**Response:** The 7 Alternatives presented in this FEIS encompass a spectrum of approaches to resolving issues and needs for change topics identified through public involvement and environmental analysis during the Forest Plan revision process. Between Draft and Final, several changes were made to Alternatives in response to public comments. These are described in the FEIS section titled “Alternative Development, Range of Alternatives” in Chapter 2.

**142.1 By including an alternative that emphasizes multiple use.**

**Response:** All Alternatives in this FEIS are consistent with the Multiple Use Sustained Yield Act. FEIS Appendix D-1 includes an explanation of how Management Prescriptions applied to all Alternatives are consistent with Multiple-Use and other laws. However, that Act allows for broad discretion and there is a wide range of opinions about that mix of goods and services constitute “multiple use”. The 7 Alternatives in this FEIS represent that range.

**142.2 By including an alternative that emphasizes scientific management.**

**Response:** The analysis of environmental effects provided in FEIS Chapter 3 provides disclosure of the projected results of implementing each of the 7 Alternatives based on the best available science. Each of the Alternatives provides for a different combination of constraints and management of resources that respond to both scientific and social concerns. There is a wide range of opinions about what would constitute scientific management. With regard to withdrawing inventoried roadless areas from harvest, FEIS Appendix CII provides an evaluation of values of each inventoried roadless area. Alternative 7 was designed to take these values into account when applying management prescriptions in contrast to Alternatives 1,3,and 6 that apply the Roadless Area Conservation Rule.

**142.3 By including a balanced range of non-motorized winter recreation designations.**

**Response:** The range of alternatives for non-motorized winter recreation is displayed in this FEIS in Chapter 3 under Topic 4, Table REC-12. The relative percentages of non-motorized winter opportunity are based on mapping of specific areas for non-motorized winter uses considering accessibility as well as incorporating decisions made through wilderness designation. The Alternatives respond to specific comments about particular areas for non-motorized use in winter rather than on a mathematically even spread of acres among alternatives.

**142.4 By including an alternative that further restricts motorized access.**

**Response:** The decision not to entertain site-specific changes to existing Travel Management Plans for summer is explained in the FEIS, Chapter 2, under the section titled “Alternatives Considered but Eliminated From Detailed Study”. This decision is within the discretion of the Forest Supervisor (36 CFR 219.12(b)). However concerns raised between Draft and Final about the implications of Recreation Opportunity Spectrum Mapping for future Travel Management Planning have now been addressed through clarifying language added in FEIS Chapter 2, Common Characteristics of Alternatives, Appendix D, and in the Revised Forest Plan Chapter 4.

**142.5 By including an alternative that has no roadless or non-motorized Designations.**

**Response:** Update of the roadless area inventory and evaluation of roadless areas for potential wilderness recommendation are required components of Forest Plan Revision (36 CFR 219.17(a)). Alternatives 4 and 5 recommend no roadless areas for wilderness, which would add to non-motorized acres

**142.6 By including an alternative that recommends all roadless areas as wilderness.**

**Response:** This was not considered to be reasonable because not all inventoried roadless areas have high quality wilderness characteristics. FEIS Appendix CI provides an evaluation of each roadless area for wilderness recommendation.

**142.7 By including a wide range of alternatives for wilderness recommendation.**

**Response:** The FEIS range of Alternatives includes from 0 to 388,900 acres of recommended wilderness or 0 to 64% of inventoried roadless areas. Several areas were added to recommended wilderness in Alternative 1 in response to public comment about specific roadless areas with high quality wilderness characteristics. Given that not every inventoried roadless area has these characteristics, the range of reasonable alternatives area provided. FEIS Appendix CI provides an evaluation of each roadless area for wilderness recommendation.

**142.8 By including an alternative that eliminates timber harvesting and grazing.**

**Response:** FEIS Alternative 1 eliminates timber harvesting. Elimination of grazing was not included for reasons explained in FEIS, Chapter 2 under the heading “Alternatives Considered But Eliminated From Detailed Study.”

**142.9 By including a full range of alternatives for grazing.**

**Response:** We have added additional suitability criteria in Alternative 2 to be responsive to the concern about the range of alternatives for grazing. See FEIS Chapter 2, Alternative 2 and Comparison of Alternatives.

**142.10 By including alternatives indicating reductions in animal unit months to reflect current demand.**

**Response:** The FEIS provides a discussion of animal unit months and demand variables in Chapter 3, Topic 7, under the heading “Livestock Grazing Levels”.

**142.11 By maintaining the current range of alternatives for grazing.**

**Response:** See Response 142.9.

**142.12 By including an alternative with large carnivores as management indicator species.**

**Response:** FEIS Chapter 2 under the heading “Alternatives Considered but Eliminated From Detailed Study” provides a discussion of the appropriateness of large carnivores as MIS. FEIS Chapter 3, Topic 2, Wildlife provides a discussion of MIS and why they were selected.

**142.13 By including an alternative that protects biodiversity and emphasizes ecosystem services.**

**Response:** Within the range of reasonable alternatives, Alternatives 1 and 2 were designed to emphasize protection of biodiversity and ecosystem services such as clean water, air and diverse habitats.

## **Adequacy of Alternatives**

**143. The Wasatch-Cache National Forest should reject all six alternatives until it provides further guidelines defining financial, social, and access impacts.**

**Response:** The FEIS displays the expected effects of 7 Alternatives including social, economic and access. See Chapter 2 Comparison of Alternatives, Chapter 3, Topic 3 Roads Access Management, and Social and Economic Analysis.

**144. The Wasatch-Cache National Forest should revise alternatives to more adequately plan for an increase in off road vehicle use and associated impacts.**

**Response:** The Revised Forest Plan includes Objectives for OHV and Non-Motorized Travel Management as well as for Education and Enforcement. Also See Response 142.4

**145. The Wasatch-Cache National Forest should eliminate Alternatives 1 and 5 because both are too extreme to be acceptable**

**Response:** While some may view Alternatives 1 and 5 as extreme, they were developed in direct response to public comment and provide for disclosure of effects for a range of reasonable alternatives as required under NEPA. Selection of Alternative 7 reflects the Forest Service desire to provide for some balance between these ends of the spectrum.



## Comparison of Alternatives

**146. The Wasatch-Cache National Forest should compare the effectiveness of Alternatives 1 and 6 in meeting stated goals for preserving ecosystem values and wildlife.**

**146.1 With respect to management prescriptions.**

**Response:** FEIS Chapter 3, Topic 2, Wildlife provides *improved* information on the effects of each of the Alternatives, their mapped management prescriptions, and the allowed activities on groups of wildlife species. Effects on ecosystem values for each Alternative are displayed in FEIS Chapter 3, Topic 1, Watershed Health and Topic 2, Vegetation. Table VEG-7 summarizes how each of the 7 alternatives affects ecosystems in terms of properly functioning conditions. The Record of Decision explains why Alternative 7 was selected given its relative effects on ecosystem values and wildlife.

**146.2 With respect to motorized recreation.**

**Response:** Each of the 7 Alternatives in the FEIS provides for a different mix of uses and protections. FEIS Chapter 3, Topics outlined above in Response 146.1 provide disclosure of effects of motorized recreation on ecosystem values and wildlife. The Record of Decision explains why Alternative 7 was selected given its' relative effects on ecosystem values and wildlife.

**146.3 With respect to winter recreation.**

**Response 146.3:** See Response 146.2

**146.4 With respect to scenic quality.**

**Response:** FEIS Chapter 3, Topic 4, Scenery Management includes a display of differences between the 7 Alternatives with regard to scenic integrity.

**146.5 With respect to ecosystem protection.**

**Response:** See Response 146.1

**147. The Wasatch-Cache National Forest should compare the alternatives with respect to risk of uncharacteristic wildfire, insects, and disease.**

**Response:** FEIS Chapter 3, Topic 2, Vegetation under the headings "Effects on Vegetation Communities from Fire Management" and "Effects on Vegetation Communities from Insects, Disease, and Noxious Weeds" provide an improved discussion of the effects of the 7 Alternatives with respect to these topics. FEIS Appendix B-1 includes a discussion of vegetation modeling used to compare results of alternatives on factors influencing wildfire, insects, and disease.

**148. The Wasatch-Cache National Forest should provide resource outputs for each alternative.**

**Response:** The DEIS clearly displayed outputs in DEIS Chapter 2, Comparison of Alternatives, Table 2-2. Again, in FEIS Chapter 2, Comparison of Alternatives, Table 2-2 shows projections of outputs for each alternative.

**149. The Wasatch-Cache National Forest should compare the alternatives with respect to forest health.**

**Response:** The best approximation of this comparison is provided in the FEIS, Chapter 3, topic 2 vegetation, table VEG-7.

**150. The Wasatch-Cache National Forest should explain why Taylor Canyon is better protected under Alternative 5 than under Alternative 6.**

**Response:** This question resulted in clarification of the intent of management prescriptions for watershed emphasis (3.1 and 3.2). The management prescription applied to Taylor Canyon in Alternative 7 protects Taylor Canyon by not allowing road construction.

## **Suggestions for New Alternatives**

**151. The Wasatch-Cache National Forest should evaluate new alternatives.**

**The CUFF Alternative.**

**Response:** We believe within the range of the 7 Alternatives presented in this FEIS, most of the CUFF Alternative components are included and analyzed. Alternative 5 includes the suggested prescriptions for suitable timber that ignore inventoried roadless areas and allow range and timber production on the same areas. Alternatives 2-7 allow timber harvest in prescription category 8. All Alternatives make varying degrees of use of prescription 3.2 and 5.1, which are similar to the CUFF suggested 5.3. Concerns about big game winter range are addressed through both management prescriptions 3.2 and through winter recreation mapping. Visual Quality is addressed in all Alternatives through the Scenery Management System. The exception is that none of the 7 Alternatives allow for summer cross-country motorized travel (CUFF prescription 4.3.1). In the State of Utah, summer motorized travel is legal only on routes and areas designated as such.

**151.1 The Balanced Alternative (Alternative 7).**

**Response:** We believe within the range of the 7 Alternatives presented in this FEIS, the Balanced Alternative components are included and analyzed. Some are adopted in Alternative 7. Since the Balanced Alternative starts with Alternative 5 and adjusts it to incorporate aspects of other Alternatives (such as the commercial timber harvest more like Alternative 4, grazing at current levels like Alternative 3, watershed protection that is more like Alternative 6, and winter motorized area similar to the current Travel Plan for Logan Ranger District like in Alternative 3), the analysis has provided for disclosure of effects similar to those of the Balanced Alternative. Increased potential for summer motorized trails on the east half of the Bear River Range is incorporated into Alternative 7 through management prescriptions that allow new trail construction as well as clarification of the relationship between ROS and future Travel Management Planning. Alternative 3 applies the suggested 5.1/6.1 Prescription to the Gibson and Swan Creek IRA's. Portions of the specific suggestions for the Mount Naomi IRA are encompassed by the 7 Alternatives in the FEIS however none are exactly as suggested. Alternative 7

uses 2.6 rather than the suggested 3.1, providing additional protection of watershed and roadless area values. Alternative 3 uses 6.1 for a portion though not all of the area consistent with this suggestion. Alternative 3 applies a 3.2 rather than the suggested 3.1 to Mount Logan North IRA but these prescriptions have identical allowed activities in this Alternative. Alternatives 2, 3, 6, and 7 apply the suggested 3.2 to the Mount Logan West IRA. Alternatives 2 and 6 apply the suggested 3.1 to portions of the Mount Logan South IRA, Alternative 7 applies 3.1 as suggested, and Alternatives 3 and 6 apply the suggested 5.1/6.1 to at least part of the remainder of these areas although not the entire area. There are a very large number of combinations of alternative prescription arrangements possible. The range of the 7 Alternatives analyzed in the FEIS provides for disclosure of the spectrum, although not all potential prescription combinations, of options for each roadless area.

**151.2 To create a travel plan alternative.**

**Response:** The FEIS includes a range of reasonable alternatives developed in response to issues and public comments on Forest Plan revision. Travel Management Planning is recognized as an important component of forest management and existing Travel Management Plans were assumed to be adequate as a baseline for summer travel opportunities in all Alternatives. The Revised Forest Plan includes an Objective to address needs for inventorying current trail opportunities and completing a roads analysis for maintenance levels 1 and 2 roads as well as updating the Salt Lake, Ogden, and Logan Ranger District summer Travel Management Plans. Reasons for not analyzing site-specific Travel Management decisions within Forest Plan revision analysis are explained in FEIS Chapter 2 under the heading “Alternatives Considered But Not Analyzed in Detail.”

**152. The Wasatch-Cache National Forest should create a combined alternative of 1, 2, and 6, with overall zoning closer to Alternative 1 to ensure appropriate wilderness protection.**

**Response:** We believe the range of 7 Alternatives analyzed in this FEIS provides for a reasonable number of examples covering the full spectrum of options for wilderness protection.

## **Alternatives Considered in Detail**

### **Alternative 1**

#### **Select Alternative 1**

**153. The Wasatch-Cache National Forest should select Alternative 1**

**153.1 Because it emphasizes wilderness protection**

**153.2 Because it protects habitat**

**153.3 Because it reduces motorized recreation**

**153.4 Because it preserves recreational opportunities**

**153.5 Because it protects the environment**

**153.6 Because it prohibits other development**

**Response:** Thank you for expressing your views on this Alternative. All views were carefully considered during development and evaluation of the existing Alternatives.

**154. The Wasatch-Cache National Forest should select Alternative 1 as the Preferred Alternative.**

**Response:** See Response 153.

**Do Not Select Alternative 1**

**155. The Wasatch-Cache National Forest should not select Alternative 1.**

**155.1 Because it restricts recreational opportunity**

**155.2 Because it promotes wilderness above other uses**

**155.3 Because it restricts use**

**155.4 Because it harms wildlife habitat**

**Response:** See Response 153.

**Modify Alternative 1**

**156. The Wasatch-Cache National Forest should modify Alternative 1.**

**156.1 To allow management**

**Response:** We agreed that Alternative 1 should be clarified to include active rehabilitation of areas damaged by recreation or other uses. The description of this Alternative in FEIS Chapter 2 has been modified and effects of this Alternative discussed in FEIS Chapter 3 have been adjusted accordingly.

**156.2 To allow heli-skiing**

**Response:** There is an infinite combination of Alternative elements possible. The FEIS includes 7 Alternatives, 4 of which allow heli-skiing. Given the extent of recommended wilderness in the Central Wasatch for Alternative 1, the addition of heli-skiing to this alternative would be incompatible.

**Alternative 2**

**Select Alternative 2**

**157. The Wasatch-Cache National Forest should select Alternative 2**

**157.1 Because it is a fair compromise**

**157.2 Because it preserves the land**

**157.3 Because it protects the environment**

**157.4 Because it has the least impact on air quality**

**157.5 Because there are already enough roads on the forest**

**Response:** See Response 153.

## **Do Not Select Alternative 2**

### **158. The Wasatch-Cache National Forest should not select Alternative 2.**

**158.1 Because it restricts recreational opportunities**

**158.2 Because it promotes wilderness above other use**

**158.3 Because it harms wildlife habitat**

**Response:** See Response 153.

## **Modify Alternative 2**

### **159. The Wasatch-Cache National Forest should modify Alternative 2 to address motorized uses of the forest.**

**Response:** There is an infinite combination of Alternative elements possible. The FEIS includes 7 Alternatives, each with different approaches to motorized uses.

We believe the range of 7 Alternatives analyzed in this FEIS provides for a reasonable number of examples covering the full spectrum of options for motorized uses of the forest.

## **Alternative 3**

### **Select Alternative 3**

#### **160. The Wasatch-Cache National Forest should select Alternative 3 because it is well balanced**

**Response:** See Response 153.

#### **161. The Wasatch-Cache National Forest should select Alternative 3 as the Preferred Alternative.**

**Response:** See Response 153.

### **Do Not Select Alternative 3**

#### **162. The Wasatch-Cache National Forest should not select Alternative 3.**

**Response:** See Response 153.

## **Alternative 4**

### **Select Alternative 4**

#### **163. The Wasatch-Cache National Forest should select Alternative 4.**

**163.1 Because it maintains existing uses**

**163.2 Because it is a fair compromise**

**Response:** See Response 153.

## **Alternative 5**

### **Select Alternative 5**

- 164. The Wasatch-Cache National Forest should select Alternative 5.**
- 164.1 Because it is well balanced**
  - 164.2 Because it has wide public support**
  - 164.3 Because it preserves recreational access**
  - 164.4 Because it allows active management**
  - 164.5 Because it allows local control**
  - 164.6 Because it maintains existing uses**
  - 164.7 Because it allows for conversion of natural resources into commodities**
  - 164.8 Because it allows needed flexibility in timber management**
  - 164.9 Because it preserves social values**
  - 164.10 Because more wilderness is not needed**
  - 164.11 Because it will allow ski area expansion**
  - 164.12 As long as it does not interfere with the growth of vegetation**
- Response:** See Response 153.

- 165. The Wasatch-Cache National Forest should select Alternative 5 as the Preferred Alternative.**
- Response:** See Response 153.

### **Do Not Select Alternative 5**

- 166. The Wasatch-Cache National Forest should not select Alternative 5.**
- 166.1 Because it allows too much off-road vehicle abuse**
  - 166.2 Because it allows too much development**
- Response:** See Response 153.

### **Modify Alternative 5**

- 167. The Wasatch-Cache National Forest should modify Alternative 5.**
- 167.1 To add the big game closure between Little Bear/Logan Canyon Face and Right hand Fork**
  - 167.2 To reduce timber harvest outputs**
  - 167.3 To more adequately address extractive activities, restoration, and monitoring**
  - 167.4 To coincide with the travel plan**
- Response:** The range of Alternatives analyzed in this FEIS includes each of the suggested components. Since there are an infinite number of combinations of alternative elements that could be analyzed, the FEIS includes a spectrum to disclose the differences in potential effects. Alternative 7 was developed with careful consideration of suggestions for modifications to the 6 Alternatives presented in the DEIS.

## **Alternative 6, The Preferred Alternative**

### **Select Alternative 6**

**168. The Wasatch-Cache National Forest should select Alternative 6.**

**168.1 Because it is a fair compromise**

**168.2 Because it protects recreational opportunities**

**168.3 Because it preserves heli-skiing**

**168.4 Because it protects the environment**

**Response:** See Response 153

### **Do Not Select Alternative 6**

**169. The Wasatch-Cache National Forest should not select Alternative 6.**

**169.1 Because it will reduce funding**

**169.2 Because it will reduce motorized recreation opportunities**

**169.3 Because it will reduce timber harvesting**

**169.4 Because it leans too far toward extreme preservation**

**Response:** See Response 153

### **Modify Alternative 6**

**170. The Wasatch-Cache National Forest should modify Alternative 6.**

**170.1 To more adequately protect the environment**

**170.2 To protect wildlife corridors**

**170.3 To protect Canadian lynx habitat**

**170.4 To address carbon sequestration**

**170.5 To increase recommended wilderness**

**170.6 To include the High Uinta Roadless Area in proposed wilderness designations**

**170.7 To preserve motorized recreation opportunities**

**170.8 To address recreational conflicts**

**170.9 To create less restrictions**

**Response:** See Response 167.

## **Forest Plan Direction**

### **Management Prescription Categories**

#### **Management Prescription Category Allocations General**

**171. The Wasatch-Cache National Forest should provide a more equitable distribution of acres by management prescription categories.**

**Response:** The seven alternatives in the FEIS provide a range of management prescription category distributions across the landscapes of the WCNF. The prescriptions were mapped based on both the capability and sensitivity of the land

and the approach of the particular alternative toward resolving the issues identified. See Table 2-1 in FEIS Chapter 2 Comparison of Alternatives to review the range of prescription assignments.

**172. The Wasatch-Cache National Forest should allocate acreage in inverse proportion to the degree of impact of each activity using a rating scale based on impacts.**

**Response:** Alternative 1 provides a distribution of management prescriptions that comes closest to accomplishing this suggestion since it places the most acres under the most restrictive prescriptions. See Comparison of Alternatives, FEIS Chapter 2.

**173. The Wasatch-Cache National Forest should default to Management Prescription Categories 5.1/6.1 in roadless areas.**

**Response:** Prescriptions were mapped for each alternative based on the capabilities and sensitivities of the land along with the approach of the particular alternative for resolving the identified issues. Alternative 3 has the highest acreage of these prescriptions although it does not specifically target roadless areas. Acres of Prescriptions applied to each roadless area are displayed in FEIS Appendix C2.

**174. The Wasatch-Cache National Forest should designate more areas to Management Prescription Category 1.5 or 2.6 to protect values associated with undeveloped areas.**

**Response:** Alternative 1 is the alternative that prescribes 1.5 and 2.6 for the most acreage of any alternative and effects of this are disclosed in Chapter 3 of the FEIS.

**175. The Wasatch-Cache National Forest should apply the protections of Management Prescription Category 3.0 to all areas of the forest to protect habitats and watersheds.**

**Response:** Prescriptions were mapped for each alternative based on the capabilities and sensitivities of the land along with the approach of the particular alternative for resolving the identified issues. Alternatives 6 and 7 apply 3 prescriptions to the most acres among the alternatives presented in the FEIS and effects of these are disclosed in FEIS Chapter 3. To apply these prescriptions to the entire forest would not provide for resolution of some of the issues identified and therefore an alternative that did this was not analyzed in detail. Emphasis of other prescriptions was needed to provide a balance across the Forest.

**176. The final Forest Plan should clarify that the AHWE management prescription category does not apply to private inholdings.**

**Response:** The Revised Forest Plan management prescriptions do not apply to private inholdings. Non-National Forest lands are shown in gray on maps and discussed under management prescription 7 in the Revised Forest Plan.



## Modifications to Management Prescription Categories

- 177. The final Forest Plan should eliminate the differential management prescription category activities permitted in inventoried roadless versus non-roadless areas.**

**Response:** Alternative 7 does this.

- 178. The Wasatch-Cache National Forest should adjust allowed motorized activities in different management prescription categories.**

**Response:** Although some of the prescriptions that are focused on recreation do have a motorized or non-motorized emphasis, the majority of this is determined and displayed based on Travel Management Plans, and Recreation Opportunity Class Mapping for both winter and summer. The prescription maps do not address motorized/non-motorized activities.

- 179. The Wasatch-Cache National Forest should prohibit grazing in Management Prescription Category 3 where there is a gross negative impact.**

**Response 179:** Capability and Suitability for livestock grazing is based on criteria described in FEIS Appendix B9. The only Prescription that inherently is classified as not suited for livestock grazing is 2.4 Research Natural Areas. Specific areas of land that are in unsatisfactory condition were removed from the suitable for grazing land base in Alternatives 1,2,6, and 7. These lands occur in Prescription Category 3 as well as other prescriptions so there was no way to tie suitability based on this criterion directly to a Prescription Category. The remainder of the Allotments in which these unsatisfactory condition lands occur is still classified as suitable for livestock grazing.

- 180. The Wasatch-Cache National Forest should omit the word “generally” from Management Prescription Category 4.2. with regard to non-motorized emphasis.**

**Response:** This has been done.

- 181. The Wasatch-Cache National Forest should clarify what is permitted under management prescription categories.**

**Response:** In the Revised Forest Plan, Chapter 4.A.5 Management Prescriptions have been edited for clarity and Standards and Guidelines have been added to clarify the intentions for each of the allowed activities.

- 182. The Wasatch-Cache National Forest should redefine Management Prescription Categories 3.1 and 3.2.**

**Response:** The request to redefine these Categories so that they prohibit road construction, motorized recreation, and recreational development is already displayed and analyzed in the FEIS in Alternatives 1,2,3, and 6. In Alternative 7, Category 3 Prescriptions have been further subdivided to include areas where these activities are allowed and not allowed. See FEIS Chapter 2 Alternatives and Allowed Activities Tables.

**183. The Wasatch-Cache National Forest should clarify the status of Management Prescription Category 7.0.**

**Response:** The status of Prescription Category 7 is explained and clarified in the Revised Forest Plan Chapter 4.A.5.

**184. The Wasatch-Cache National Forest should define the difference between Management Prescription Categories 2.6 and 4.1.**

**Response:** The Revised Forest Plan provides descriptions of these Prescription Categories in Chapter 4.A.5. Key differences are now highlighted with standards and guidelines. 2.6 does not allow vegetation/fuel treatments nor new trail construction, but does allow summer motorized recreation on designated routes while 4.1 does allow vegetation/fuel treatment, and new trail construction, but does not allow summer motorized recreation.

**Management Prescription Category Allocations – Roadless/Proposed Wilderness Areas**

**185. The Wasatch-Cache National Forest should assign more protective management prescription categories to all roadless acres.**

**185.1 By utilizing Management Prescription Category 2.6**

**185.2 By utilizing Management Prescription Categories 1.5 or 2.6.**

**185.3 By utilizing Management Prescription Categories 2.4-2.7**

**185.4 By utilizing Management Prescription Categories 2.6 or 4.1**

**Response:** FEIS Chapter 3, Topic 5, under the heading “Management Prescriptions and effects on roadless values” provides an evaluation of the degree to which roadless areas are protected by alternative through assignment of Prescription Categories- see Table RW-9. The range of alternatives evaluated each provide varying degrees of protection.

**186. The Wasatch-Cache National Forest should use non-timber yielding management prescription categories in roadless areas.**

**Response:** Alternatives 1,2, and 6 do not allow timber harvest in roadless areas.

**Management Prescription Category Allocations – Site-Specific Requests**

**Cache Box Elder Management Area**

**187. The Wasatch-Cache National Forest should change the proposed management prescription categories for Water Canyon to Management Prescription Category 1.5.**

**Response:** See response 188.

**188. The Wasatch-Cache National Forest should change the proposed management prescription categories for Green Canyon to Management Prescription Category 1.1 or 1.2**

**Response:** Alternative 1 places the 1.5 prescription in Green Canyon (except the canyon bottom which is not qualified for Wilderness because of water development). Categories 1.1 and 1.2 are only applied to already Congressionally designated wildernesses not areas being recommended.

**189. The Wasatch-Cache National Forest should change the boundary of Management Prescription Category 4.3 in Green Canyon.**

**Response:** The boundary of this prescription was placed specifically to incorporate the recreational uses there now with the remainder of the area emphasizing watershed (3.1). Should the proposed development take place in the mouth of the canyon and dispersed camping discontinued in the upper portion, the prescription map could be changed and the Forest Plan amended to reflect that site-specific decision.

**190. The Wasatch-Cache National Forest should change the proposed management prescription categories in Mount Naomi Wilderness to Management Prescription Category 1.1**

**Response:** Category 1.1 is by definition an “unmodified natural environment”. Alternatives 1,2,3, and 5 show all areas within Mount Naomi Wilderness except existing trails (which cannot qualify as 1.1) as a 1.1 Prescription.

**191. The Wasatch-Cache National Forest should change management direction for the Mount Naomi Inventoried Roadless Area.**

**Response:** Portions of the specific suggestions for this IRA are encompassed by the 7 Alternatives in the FEIS however none are exactly as suggested. Alternative 7 uses 2.6 rather than the suggested 3.1, providing additional protection of not only watershed but roadless area values. Alternative 3 uses 6.1 for a portion though not all of the area consistent with this suggestion. There are an very large number of combinations of alternative prescription arrangements possible. The range of the 7 Alternatives analyzed in the FEIS provides for disclosure of the spectrum, although not all potential prescription combinations, of options for this roadless area.

**192. The Wasatch-Cache National Forest should implement proposed management prescription categories for the Mount Naomi area by Utilizing Management Prescription Category 2.6**

**Response:** Alternative 7 does this.

**193. The Wasatch-Cache National Forest should change the proposed management prescription categories for the Mount Naomi area.**

**193.1 To Management Prescription Category 1.5**

**193.2 To Management Prescription Category 4.1**

**Response:** Alternatives 1,4, and 3 apply these Prescriptions and disclose the effects of this on the Mount Naomi roadless area.

- 194. The Wasatch-Cache National Forest should adopt the management prescription categories proposed in Alternative 1 for the Logan Canyon and Mount Naomi areas.**

**Response:** See Response 153.

- 195. The Wasatch-Cache National Forest should change the proposed management prescription categories for the area surrounding White Pine Lake to Management Prescription Category 1.5**

**Response:** Alternative 1 does this and discloses the effects.

- 196. The Wasatch-Cache National Forest should change management direction for the Gibson Inventoried Roadless Area.**

**Response:** Alternative 3 applies the suggested 5.1/6.1 Prescription to this area. This allows for the suggested roading, timber harvest, and trail construction. All alternatives allow for road reconstruction/realignment to reduce resource impacts. Suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning.

- 197. The Wasatch-Cache National Forest should change management direction for the Temple Peak Inventoried Roadless Area.**

**Response:** Alternative 5 applies the suggested 5.2/6.2 Prescription to this area. This allows for the suggested roading, timber harvest, and trail construction. All alternatives allow for road reconstruction/realignment to reduce resource impacts. Suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning. The suggestion for winter motorized is displayed in Alternative 3.

- 198. The Wasatch-Cache National Forest should change management direction for the Right Hand Fork Logan Inventoried Roadless Area.**

**Response:** Alternative 3 applies the suggested 5.1/6.1 Prescription to this area, which also allows for the suggested roading, timber harvest, and trail construction. All alternatives allow for road reconstruction/realignment to reduce resource impacts. Suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning. The suggestion for winter motorized is displayed in Alternatives 3 and 5.

- 199. The Wasatch-Cache National Forest should implement proposed management prescription categories in the Mount Logan area by utilizing Management Prescription Categories 3.1/3.2**

**Response:** Alternative 7 does this.

**200. The Wasatch-Cache National Forest should change management direction for the Mount Logan (West) Inventoried Roadless Area.**

**Response:** Alternatives 3 and 7 apply the suggested 3.2 Prescription and ROS of SPNM; however, neither allows for the suggested timber harvest and roading. Alternatives 4 and 5 apply prescriptions that allow these. All alternatives allow for road reconstruction/realignment to reduce resource impacts.

**201. The Wasatch-Cache National Forest should change management direction for the Mount Logan (South) Inventoried Roadless Area.**

**Response:** Alternative 3 applies the suggested 3.2 Prescription and Alternatives 4 and 5 apply a 6.2 (rather than 5.1/6.1) providing for a spectrum of options in this area though not exactly the Prescriptions suggested. This spectrum allows for the suggested roading and timber harvest. All alternatives allow for road reconstruction/realignment to reduce resource impacts. Suggested ROS is partially though not entirely encompassed by Alternatives 5 and 7. New trail construction is allowed in Alternatives 7,6,5, and 4. Additional suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning. The suggestion for winter motorized is displayed in Alternative 3.

**202. The Wasatch-Cache National Forest should change the proposed management prescription categories in Logan Canyon.**

**202.1 To Management Prescription Category 1.5**

**Response:** Alternatives 1 and 2 display this option for the area.

**202.2 To a 3.x Management Prescription Category**

**Response:** None of the Alternatives apply the suggested Prescription to this area although the 2.6 Prescription applied in Alternative 7 provides for the watershed protection but with less flexibility than a 3.0 Prescription and more than the 1.5 from which the respondent wanted to see a change.

**203. The Wasatch-Cache National Forest should change management direction for the Mahogany Range Inventoried Roadless Area.**

**Response:** Alternatives 3,6, and 7 apply the suggested 3.2 Prescription to this area however these Alternatives do not allow for the suggested roading and timber harvest. Alternatives 4 and 5 apply prescriptions that do allow for these activities. All alternatives allow for road reconstruction/realignment to reduce resource impacts. None of the Alternatives has this area as SPM for summer but Alternative 4 does apply Roaded Natural. Suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning. The suggested Winter Non-motorized class is applied to this area in Alternatives 1,2,6, and 7.

**204. The Wasatch-Cache National Forest should change management direction for the Boulder Mountain Inventoried Roadless Area.**

**Response:** Alternatives 4 and 5 apply the suggested 5.2/6/2 Prescription to this area allowing the suggested roading, timber harvest, and new trail construction. All alternatives allow for road reconstruction/realignment to reduce resource impacts. None of the Alternatives has this entire area as SPM for summer but Alternative 4 does apply Roaded Natural. Suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning. Alternatives 3,4,5,6 and 7 apply the suggested Winter Motorized class to this area.

**205. The Wasatch-Cache National Forest should implement proposed management prescription categories south of Hardware Ranch.**

**205.1 By utilizing Management Prescription Category 2.4**

**205.2 By utilizing Management Prescription Category 3.1/3.2**

**Response:** Thank you for expressing your views in support of these Prescriptions applied in this area in DEIS Alternative 6. All views were carefully considered during development and evaluation of the existing Alternatives.

**206. The Wasatch-Cache National Forest should implement proposed management prescription categories in the Wellsville Mountains by utilizing Management Prescription Category 3.2.**

**Response:** Thank you for expressing your views in support of this Prescription applied to this area in DEIS Alternative 6. All views were carefully considered during development and evaluation of the existing Alternatives.

**207. The Wasatch-Cache National Forest should change the proposed management prescription categories in the Wellsville Mountains to Management Prescription Category 1.5**

**Response:** Alternative 1 applies Prescription 1.5 to the suggested parcel at the northern end of the Wellsville Mountains. Either this or the 3.2 applied in other alternatives can provide needed spring protection for wildlife.

**208. The Wasatch-Cache National Forest should implement proposed management prescription categories for the Northern Central Bear River Range by utilizing Management Prescription Category 3.2**

**Response:** Thank you for expressing your views in support of this Prescription applied to this area in DEIS Alternative 6. All views were carefully considered during evaluation of the existing Alternatives and development of Alternative 7.

**209. The Wasatch-Cache National Forest should change the proposed management prescription categories for the Northern Central Bear River Range to Management Prescription Categories 3.1 and 2.1-2.3**

**Response:** FEIS Alternative 7 applies Prescription 3.1A to all streams with known populations of Bonneville Cutthroat Trout. Suggested Prescriptions 2.1-2.3 have not been applied to the Wasatch-Cache National Forest at this time because no

suitability determination has been completed for Wild and Scenic River designation. Beaver Creek was found eligible in the inventory but until such time as a suitability analysis is completed, the Wild and Scenic Prescriptions will not be applied.

**210. The Wasatch-Cache National Forest should implement proposed management prescription categories on the Mid Bear River Range.**

**210.1 By utilizing Management Prescription Category 3.1/3.2**

**210.2 By utilizing Management Prescription Category 2.5**

**Response:** Thank you for expressing your views in support of these Prescriptions applied to these areas in DEIS Alternative 6. All views were carefully considered during evaluation of the existing Alternatives and development of Alternative 7.

**211. The Wasatch-Cache National Forest should change the proposed management prescription categories on the Mid Bear River Range to Management Prescription Category 3.1/3.2.**

**Response:** Alternative 2 applies the suggested Prescriptions to this area displaying the effects of this option in the FEIS.

**212. The Wasatch-Cache National Forest should change the proposed management prescription categories in Dry Canyon to Management Prescription Category 1.5.**

**Response:** None of the Alternatives applies a 1.5 Prescription to the Mount Logan North Roadless Area. Alternative 1 was developed to reflect one end of the spectrum of wilderness recommendations but even it does not recommend all roadless areas. Given the existing motorized road and trail intrusions in this area as well as the proximity of the already designated Mt. Naomi and Wellsville Mountain Wildernesses, this area was not included in the range of alternatives.

**213. The Wasatch-Cache National Forest should change the proposed management prescription categories for the Mount Watson area to Management Prescription Category 1.5.**

**Response:** Alternatives 1 and 2 apply Prescription 1.5 to this area displaying the effects of this option in the FEIS.

**North Wasatch Ogden Valley Management Area**

**214. The Wasatch-Cache National Forest should implement proposed management prescription categories for the Upper South Fork Ogden River to Management Prescription Category 1.5.**

**Response:** See Response 208.

**215. The Wasatch-Cache National Forest should change the proposed management prescription categories for Upper South Fork Ogden River to Management Prescription Category 1.5.**

**Response:** See Response 208.

- 216. The Wasatch-Cache National Forest should change the management prescription category in the Burch Creek area to Management Prescription Category 4.2 or 4.5.**

**Response:** Alternative 5 applies Prescription 4.4 which allows new recreation development such as the suggested gondola.

- 217. The Wasatch-Cache National Forest should change the proposed management prescription categories for the Francis Inventoried Roadless Area to Management Prescription Category 2.6.**

**Response:** Alternative 2 applies this prescription to the area and displays the effects of this option in the FEIS.

- 218. The Wasatch-Cache National Forest should change the management prescription category in the Wheeler Creek area.**

**218.1 To Management Prescription Category 2.6**

**Response:** Alternative 7 applies Prescription 3.1W to this area. Prescription 3.1W does not allow road construction or recreation development regardless of whether the area is inventoried roadless.

**218.2 To Management Prescription Categories 3.1/3.2**

**Response:** The sliver of Prescription 4.5 along the old Snow Basin Road which was of concern to this respondent has been removed in Alternative 7 and the suggested Prescription 3.1 applied to this area.

- 219. The Wasatch-Cache National Forest should change the management prescription category in the Morgan/Davis county line area to Management Prescription Category 2.6.**

**Response:** Alternative 2 applies the suggested prescription. Concern about motorized uses in the area, both summer and winter is better addressed with Recreation mapping rather than Prescription Categories.

**Central Wasatch/Tri-Canyon Area**

- 220. The Wasatch-Cache National Forest should implement proposed management prescription categories in the Tri-Canyon area by utilizing Management Prescription Category 4.5**

**Response:** Thank you for expressing your views in support of this Prescription applied to this area in DEIS Alternative 6. All views were carefully considered during evaluation of the existing Alternatives and development of Alternative 7.

- 221. The Wasatch-Cache National Forest should change management prescription categories in the Tri-Canyon area.**

**221.1 To Management Prescription Category 1.5**

**Response:** Alternatives 1 and 2 do this and display the effects of this option in the FEIS.



**221.2 To Management Prescription Category 2.6**

**Response:** Alternative 2 applies a 2.7 Prescription to this area with very similar effects to a 2.6 application although the specific direction to protect the Special Area (2.7) values would still need to be developed under this Alternative

**221.2 To Management prescription Category 4.5**

**Response:** As suggested, all Alternatives apply Prescription 4.5 to the existing ski area permit boundaries.

**222. The Wasatch-Cache National Forest should reassess its designation for Little Cottonwood Creek.**

**Response:** The Management Prescription applied to Little Cottonwood Creek is 3.1 in Alternatives 1-6 and 3.1A in Alternative 7 emphasizing aquatic habitat and watershed values. All management prescriptions in the Revised Forest Plan apply ONLY to National Forest System lands. Private and other ownerships are shown in gray on maps and are clearly outside the jurisdiction of the Forest Service and the Forest Plan.

**223. The Wasatch-Cache National Forest should change management prescription categories for Mount Aire.<sup>3</sup>**

**223.1 To Management Prescription Category 1.5**

**Response:** Alternative 1 applies the suggested Prescription 1.5 to this area and displays the effects of this option in the FEIS.

**223.2 To Management Prescription Category 4.1**

**Response:** Alternative 3 applies the suggested Prescription 4.1 to this area and displays the effects of this option in the FEIS.

**224. The Wasatch-Cache National Forest should implement the proposed management prescription category for Cardiff Fork, Big Cottonwood Canyon by utilizing Management Prescription Category 4.1.**

**Response:** Alternative 3 applies the suggested Prescription 4.1 to this area and displays the effects of this option in the FEIS, however concerns about motorized recreation are not completely addressed by Prescriptions. The Recreation Opportunity Maps (both summer and winter) and Travel Management Plans provide direction for recreation and access. The word “generally” has been removed from the description of Prescription 4.2 in reference to non-motorized designation.

**225. The Wasatch-Cache National Forest should change management prescription categories for White Pine Canyon to Management Prescription Category 4.5.**

**Response:** Alternative 5 applies the suggested prescription to this area. Other Alternatives applying Prescription 4.1 do not allow new recreation development but do allow new trail construction which might allow for limited expansion of the adjacent ski area. Alternative 7 applies prescription 2.6 which does not allow either new recreation development or new trail construction.

**226. The Wasatch-Cache National Forest should change management prescription categories for Mill D North Trail to Management Prescription Category 2.6.**

**Response:** To provide the watershed protection emphasis you stated, we have identified this area as 3.1W for watershed emphasis. This better fits your concern than a 2.6 management prescription.

**227. The Wasatch-Cache National Forest should change the management prescription category in east Mill D North to 2.6 to accommodate continued mountain bike access.**

**Response:** All Alternatives with the exception of Alternative 1 allow mountain bike access in this area.

**Bear Management Area**

**228. The Wasatch-Cache National Forest should change management direction for the Swan Creek Inventoried Roadless Area.**

**Response:** Alternatives 4 and 5 apply the suggested 5.2/6.2 Prescriptions to this area, which also allows for the suggested roading, timber harvest, and trail construction. All alternatives allow for road reconstruction/realignment to reduce resource impacts. Alternative 5 also applies the suggested Summer ROS SPM and Winter Motorized Classes for the area. Suggestions about future motorized routes in this area can be considered during Travel Management Plan updates. See the Revised Forest Plan Chapter 4.A.6 for a discussion of the relationship between Recreation Opportunity Class mapping and Travel Management Planning.

**229. The Wasatch-Cache National Forest should implement the proposed management prescription categories in Garden City Canyon by utilizing Management Prescription Category 3.2.**

**Response:** Thank you for expressing your views in support of this Prescription applied to this area in DEIS Alternative 6. All views were carefully considered during evaluation of the existing Alternatives and development of the Alternative 7.

**230. The Wasatch-Cache National Forest should change the proposed management prescription categories for Garden City Canyon to Management Prescription Category 2.7.**

**Response:** Without a specific set of reasons why this Canyon should be designated a Special Interest Area, the 7 Alternatives do not include this Prescription applied to this area. Alternative 1 does apply Prescription 2.6 which has maximum protection for the area short of wilderness designation.

**231. The Wasatch-Cache National Forest should implement the proposed management prescription categories near Bear Lake Overlake to Management Prescription Category 2.5.**

**Response:** See Response 229.

- 232. The Wasatch-Cache National Forest should implement the proposed management prescription categories south of Highway 89 by utilizing Management Prescription Category 5.1.**

**Response:** See Response 229.

### **Stansbury Mountains**

- 233. The Wasatch-Cache National Forest should change the management prescription category on lands north and south of the existing Deseret Peak Wilderness to Management prescription Category 1.5.**

**Response:** Alternatives 1 and 2 apply the suggested Prescription to this area and display the effects of this option in the FEIS.

### **Uinta Mountains**

- 234. The Wasatch-Cache National Forest should change the management prescription category in the Uinta Mountains**

**234.1 To Management Prescription Category 1.5.**

**Response:** Alternative 1 applies the suggested Prescription to most of the area and Alternative 2 applies it to some of the area with both of these Alternatives displaying the effects of these options in the FEIS.

**234.2 To Management Prescription Categories 2.6 or 4.1**

**Response:** Alternatives 2,3,and to a lesser degree 6 and 7 apply these Prescriptions to parts (mainly upper adjacent to existing Wilderness) but not all of the suggested area down to the trailheads. Alternative 2 provides the best display of effects of this option in the FEIS.

- 235. The Wasatch-Cache National Forest should change the management prescription category in the Lakes backcountry to Management Prescription Category 1.5.**

**Response:** Alternative 1 applies the suggested Prescription to all and Alternative 2 to most of the area and effects are displayed in the FEIS.

- 236. The Wasatch-Cache National Forest should change the management prescription category for Boundary Creek to Management Prescription Category 1.5.**

**Response:** Alternative 1 applies the suggested Prescription to this area and displays the effects of this option in the FEIS.

- 237. The Wasatch-Cache National Forest should change the management prescription category in Middle Fork Blacks Fork to Management Prescription Category 1.5.**

**Response:** See Response 236.

- 238. The Wasatch-Cache National Forest should change the management prescription category in Hayden Fork and Upper Main Fork to Management Prescription Category 1.5.**

**Response:** See Response 236.

- 239. The Wasatch-Cache National Forest should change the management prescription category for Black's Fork and Henry's Fork to Management Prescription Category 1.5.**

**Response:** The boundaries of the 1.5 Prescription for these two areas were drawn based on the inventoried roadless area boundary that excludes existing roads.

## **Recreation Opportunity Spectrum**

### **Recreation Opportunity Spectrum General**

- 240. The Wasatch-Cache National Forest should explain how roadless areas can include roaded natural, rural, and urban Recreation Opportunity Spectrum categories.**

**Response:** See appendix B-6 for definitions of the physical setting and the criteria used to establish evidence of humans, size, and remoteness. In some instances the remoteness or size criteria will delineate ROS categories that overlap inventoried roadless areas because of a buffer from an adjacent motorized road. In these cases the user experience is being affected by the adjacent activities such as motorized use or communities.

- 241. The Wasatch-Cache National Forest should add more semi-primitive motorized areas. Page 3-31, Content Analysis.**

**Response:** See FEIS, Chapter 2 / Elements Common to All Alternatives / Past Decisions Not Being Revisited in Plan Revision / Travel Management Planning, *"Although this forest plan revision addresses winter motorized use, the designated routes open for summer motorized use remain in place consistent with current Travel Plans for all alternatives."* Although, ROS categories identify areas on the maps it does not mean that the entire area is open to motorized use, it means that an area is being affected by motorized use. Motorized use should occur on designated motorized travel routes only.

See Table 12.2 Comparison of Miles of Motorized Travel ways by ROS Category, FEIS, Chapter 3 / Topic 4 Recreation and Scenery Management, Environmental Consequences, Dispersed Recreation – Summer.

- 242. The Wasatch-Cache National Forest should recognize that semi-primitive non-motorized designations can be impacted by motorized designations on adjacent lands from the noise.**

**Response:** See Appendix B – 6 for remoteness and size criteria. Because of the capability of the existing GIS layers available at the time of the planning process a standard distance criteria was used for remoteness buffers. The

buffer distance was not modified to conform to natural barriers topography and vegetative screening, or other relevant features of local topographic relief and vegetative cover using GIS for the existing condition mapping. In some alternatives, District personnel did make modifications to the buffer based on personal knowledge or hard copy mapped data. See appendix B-6 Recreation Opportunity Spectrum and Winter Recreation Existing Condition and Alternative Mapping Process. Since the beginning of the planning process more updated layers have been developed for vegetation, and topography. This information will be incorporated into the final selected management direction.

**243. The Wasatch-Cache National Forest should develop four winter recreation classes: wilderness, non-motorized, motorized, and motorized heli-ski to allow development of more accurate travel plan maps.**

**Response:** We agree see appendix B-6, Recreation Opportunity Spectrum and Winter Recreation Existing Condition and Alternative Mapping Process.

**244. The Wasatch-Cache National Forest should change management prescriptions and Recreation Opportunity Spectrum determinations.**

**Response:** See Appendix B6 ROS process and Appendix B-5 for MPC process.

**244.1 So that managers can manage the current and future demand for motorized recreation.**

**Response:** See FEIS, Chapter 2 / Elements Common to All Alternatives / Past Decisions Not Being Revisited in Plan Revision / Travel Management Planning, *“Although this forest plan revision addresses winter motorized use, the designated routes open for summer motorized use remain in place consistent with current Travel Plans for all alternatives.”* Except for Alternatives 1 and 2 where the Roadless rule was applied and motorized routes were affected. Since travel management planning did not occur during the plan revision motorized ROS classifications were only applied to motorized travel ways. As District Travel Management Plans are updated in the upcoming planning period, ROS classification may need to be amended to reflect the decision made there.

**244.2 By not using roadless area boundaries for determining Recreation Opportunity Spectrum categories.**

**Response:** Roadless area boundaries were not used to delineate ROS classifications in any of the alternatives. In alternatives that applied the roadless rule or MPC 1.5 motorized travel ways were converted from SPM to SPNM. If adjacent polygons were SPNM, buffer lines created by the SPM were dropped creating a larger polygon of SPNM that could seem to appear to follow Roadless area boundaries.

**245. The Wasatch-Cache National Forest should address the applicability of the Recreation Opportunity Spectrum to mountain biking because mountain biking has increased in popularity since the Recreation Opportunity Spectrum was created.**

**Response:** The ROS system was developed in the 1980's. Nationally the system is in the process of being updated to recognize new technologies and their effects on the recreation experience. Although, mountain biking trails are identified, (see table REC-7) ROS does not add or eliminate mountain biking use on travel ways the District travel management plan address mountain bike use on travel ways.

**246. The Wasatch-Cache National Forest should clarify Recreation Opportunity Spectrum designations in Green Canyon.**

**Response:** See response to comment 241 and appendix B-6 description of ROS process.

**Recreation Opportunity Spectrum – Site-Specific Designations**

**247. The Wasatch-Cache National Forest should give some areas a summer Recreation Opportunity Spectrum designation of semi-primitive motorized.**

**247.1 All Roadless Areas**

**247.2 Certain areas in the Logan Ranger District.**

**Response:** All alternatives have areas of SPM, see table REC-11.

**248. The Wasatch-Cache National Forest should reallocate the area north of the High Uintas Wilderness to a winter use that is open to over-the-snow vehicles, seasonally, from December 1 to May 1.**

**Response:** For motorized winter recreation the area north of the High Uinta Wilderness is considered as open in Alternative 5. See Winter Recreation maps Alternative 5.

**249. The Wasatch-Cache National Forest should apply or extend semi-primitive motorized corridors to trails.**

**Response:** See response to comment concern statement 241.

**249.1 For Alternative 1 on the Logan Ranger District, Richards Hollow, Seep Hollow and Cart Hollow Trails.**

**Response:** We agree the change has been made to the ROS map of Alternative 1.

**249.2 For Alternative 2 on the Logan Ranger District, Richards Hollow, Seep Hollow and Cart Hollow Trails**

**Response:** We agree the change has been made to the ROS map of Alternative 2.

**249.3 For Alternatives 1, 2, 3, 5, and 6 on the Logan Ranger District, Sink Hollow Trail**

**Response:** We agree the change has been made to the ROS maps of Alternative 1, 2, 3, 5, and 6 on the Logan Ranger District.

**249.4 For Alternative 1 on the Ogden Ranger District, Skyline Trail from North Ogden Pass**

**Response:** We agree the change has been made to the ROS map of Alternative 1.

**249.5 For Alternative 2 on the Ogden Ranger District, Skyline Trail from North Ogden Pass**

**Response:** We agree the change has been made to the ROS map of Alternative 2.

**249.6 For Alternative 6 on the Ogden Ranger District, Skyline Trail from North Ogden Pass,**

**Response:** We agree the change has been made to the ROS map of Alternative 6.

## **Affected Environment**

### **Environmental Values General**

#### **Management General**

**250. The Wasatch-Cache National Forest should effectively manage forest lands.**

**250.1 By providing balanced management**

**250.2 By managing for the long term**

**Response:** This plan is focused on managing for the long-term by moving forested ecosystems toward properly functioning conditions and maintaining them into the future. We feel that a balance between various uses and outcomes has been an important factor in the development of this Forest Plan.

**251. The Wasatch-Cache National Forest should preserve natural resources.**

**252.1 Before excessive impacts take place**

**251.2 While also balancing recreational demands**

**251.3 By writing a mission statement which emphasizes protection of resources**

**Response:** We have focused on allowing activities on the Forest, while not adversely impacting the natural resources that occur. We have enhanced the public education direction in our Forest Plan.

**252. The Wasatch-Cache National Forest should recognize that environmental damage is irreversible.**

**Response:** While some impacts on the forest are irreversible, especially where soil loss has occurred or where development of roads and infrastructure are in place, other impacts can be mitigated or reversed. The Forest Plan, with its focus on properly functioning conditions, and with recommendations for wilderness, Special Interest Areas, and Research Natural Area expansions, recognizes the value of the resources we manage.

**253. The Wasatch-Cache National Forest should recognize and respond as needed to natural ecological changes over given forest landscapes.**

**Response:** Because of our past management actions, especially fire control, many of the ecosystems we manage vary moderately to greatly from historic conditions (see Table VEG-2, Topic 2 – Biodiversity and Viability, Vegetation). One of the

primary focuses of this plan is to move toward the historic range of variation, so that these ecosystems can function in a more natural state.

**254. The Wasatch-Cache National Forest should provide protection to all representative natural communities.**

**Response:** While most acres in wilderness areas of the Wasatch-Cache National Forest protect high elevation ecosystems, many of these areas range in elevation and protect a variety of plant communities and wildlife habitat. The Deseret Peak Wilderness Area ranges in elevation from near the bottom of Skull Valley up to Deseret Peak and includes various varieties of sagebrush as well as pinyon-juniper as well as Douglas-fir and limber pine and bristlecone pine. The Wellsville Wilderness Area ranges in elevation from near the valley floors in Cache Valley to the east and near Brigham City and Honeyville to the west. Juniper, maple, and sagebrush communities, as well as Douglas-fir and aspen communities are present. This plan proposes one new wilderness area near Causey Reservoir that includes a variety of elevations and no alpine areas. In addition, we are including an extension of the Morris Creek Research Natural Area east of Farmington, Utah that would include oak and mahogany communities at lower elevations, to Douglas-fir, aspen, and subalpine fir communities at the upper elevation. The Logan Canyon Special Interest Area, which is proposed because of its botanical resources (primarily rare plants, but also Douglas-fir, maple and juniper communities). Existing Research Natural Areas (Red Butte and Mollens Hollow) are primarily mid- to low-elevation ecosystems and provide additional protection.

**255. The Wasatch-Cache National Forest should continue the current forest management system because forest health has improved under the current plan.**

**Response:** While some characteristics of the Forest have quite clearly improved, some ecosystems are still far from functioning properly. Fire controls, historic livestock grazing, and some past timber harvest techniques pushed conditions far away from those that occurred historically. This plan focuses on moving more closely toward properly functioning conditions.

**256. The Wasatch-Cache National Forest should recognize that roadless areas and watersheds are sufficiently protected under the proposed plan.**

**Response:** We have added new analysis of each roadless area (Appendix C) and feel that under this proposed plan that we have focused on varying levels of protection and the different values of each roadless area.

**Adequacy of Analysis**

**257. The Wasatch-Cache National Forest should clarify its criteria for range and watershed condition improvement.**

**Response:** The criteria for range improvement (ground cover, desired conditions, and rate of improvement) are included in the 1998 Rangeland Health Amendment,



which is carried forward in this plan. Because of the various resource values and economic effects, Alternative 2, was not chosen as the preferred alternative.

## **Funding**

**258. The Wasatch-Cache National Forest should not use lack of funding as a justification for inadequate resource protection.**

**Response:** While inadequate resource protection is undesirable, the Forest cannot control the amounts and kinds of funding we receive each year. We are required by law to work as funded.

## **Protection of Specific Areas**

**259. The Wasatch-Cache National Forest should protect the Tri-Canyon area to preserve solitude.**

**Response:** Demands on the Tri-Canyon area are indeed intense and diverse. Comments on the Draft Preferred Alternative (6) caused us to reexamine the management direction developed for this area and to strengthen protection. Alternative 7 applies a 3.1w watershed emphasis management prescription to much of the non-wilderness, non-ski resort areas of the canyons. This prescription includes standards and guidelines that limit activities to protect watersheds which in turn provides for wildlife needs. The Revised Plan also has an Objective to emphasize education with a focus area on watershed protection so we can engage forest users in conserving this resource. The Revised Plan allows no new ski resorts and no ski resort boundary expansions during the planning period (10-15 years). The matter of solitude and human crowding is a difficult one given the proximity to the urban population of the Wasatch Front. Recreation opportunity classes have been mapped for the area and include semi-primitive non-motorized areas. These have user density numbers defined as thresholds. The monitoring strategy for these areas is to monitor user densities and when thresholds are approached, to initiate a public process for determining whether and how to limit user numbers.

**260. The Wasatch-Cache National Forest should protect non-ski area lands in the Tri-Canyon area to balance ski resort development.**

**Response:** See response 259.

**261. The Wasatch-Cache National Forest should protect the Uinta Mountains.**

**Response:** The FEIS displayed a range of alternatives and their expected consequences for the Uinta Mountains. Alternative 7 places management prescriptions to allow for some types of uses and development in certain areas while protecting other areas from any type of development. Some of the lower elevation lands in the Uinta Mountains are managed for timber production and oil and gas leasing, much is managed for backcountry recreation uses and wildlife habitat protection.

**262. The Wasatch-Cache National Forest should protect the Mount Watson wilderness for future generations.**

**Response:** The range of alternatives considers varying degrees of protection for this area. Alternative 7 protects this area through application of management prescriptions 1.5 and 2.6 neither of which allow any development.

**263. The Wasatch-Cache National Forest should develop a management plan for Millcreek Canyon.**

**Response:** The Revised Forest Plan puts in place broad management direction including mapped management prescriptions, recreation opportunity maps, and a desired future condition description for the Central Wasatch Management Area which includes Mill Creek Canyon. However, given that the plan must address the entire Wasatch-cache National Forest, it does not provide for very detailed and specific items for Mill Creek. Such a plan would need to be developed locally and that plan could be guided by the direction of the Revised Forest Plan.

**Effects of Activities/Disturbance**

**264. The Wasatch-Cache National Forest should prohibit activities that damage the environment until it can provide adequate monitoring and enforcement.**

**Response:** The Revised Forest Plan includes mapping of management prescriptions and recreation opportunities. We have tried to draw boundaries that are manageable and that take into account limited resources to monitor. In some cases, as we implement we may find that boundaries need to be adjusted to improve manageability and we can readily do that through amendment of the Plan. The Plan also sets Objectives specifically for education and enforcement with focus areas in OHV, user ethics, and watershed protection, and an Objective specifically to focus on improved management of grazing. These objectives and the desired future condition descriptions in the Plan emphasize gaining assistance from organized user groups to monitor, add enforcement presence, and improve our ability to educate forest users so they can assist in conserving the resources of the Forest.

**265. The Wasatch-Cache National Forest should reduce use levels to minimize human impacts.**

**Response:** Limits on numbers of people using the Forest is not directly decided by the Forest Plan. However, given the concerns expressed about this issue, we have identified some recreation opportunity classes (semi-primitive) that have user density thresholds. When monitoring shows we are approaching these thresholds, we will initiate a public process to decide whether and how to limit numbers of users in these areas.

**266. The Wasatch-Cache National Forest should prevent littering.**

**Response:** While the Forest cannot prevent littering. Environmental education is identified under numerous subgoals within the Forest Plan. Litter prevention is one component of this broad program.

## Ecosystem/Restoration Management

### Ecosystem/Restoration Management General

**267. The Wasatch-Cache National Forest should preserve public lands in their natural state.**

**267.1 To prevent costly mitigation**

**267.2 For future generations**

**267.3 For their intrinsic value**

**267.4 For educational values**

**Response:** An important focus of this Forest Plan is to move ecosystems toward properly functioning conditions, while providing various goods and services. As set in law, the mission of the Forest Service is to achieve quality land management under the sustainable multiple-use management concept, rather than through preservation, to meet the diverse needs of people. Timber harvest, where it is allowed, will follow best management practices to ensure watershed protection, nutrient cycling, and wildlife habitat diversity. Existing and proposed wilderness areas will focus on the natural functioning of the ecosystems within them. Existing and proposed Research Natural Areas and Special Interest Areas will be available for both educational uses and for research to help us understand the functioning of their ecosystems. These will benefit existing as well as future generations.

**268. The final Forest Plan should redefine properly functioning ecosystems to reflect their dynamic nature and they should reconsider need for vegetation treatments.**

**Response:** We use the Intermountain Region definition of properly functioning as it relates to historical range of variation in composition, structure (age class), and patterns on the landscape. These systems are dynamic and do not exist in a static state. Because of historic management and fire protection, most of the forested and non-forested types are skewed more toward the older age classes. And because of these factors, an estimated loss of approximately 65 percent of the aspen forests to conifer forests has occurred (O'Brien and Pope 1997). It will require a variety of tools, such as prescribed fire, wildland fire use, as well as some timber harvest, to help these ecosystems move toward the historic range of variation.

**269. The Wasatch-Cache National Forest should not rely on intensive management to preserve forest resources.**

**Response:** While the proposed plan does allow the use of timber harvest as one tool to help move the forested ecosystems of the Wasatch-Cache National Forest, other tools such as prescribed fire and wildland fire use will do much more to help these ecosystems to move toward properly functioning conditions. As illustrated in FEIS Table VEG-3 (Topic 2 – Biodiversity and Viability, Vegetation) only 5 percent of the acres treated would be treated through the use of timber harvest. Nearly 73 percent would be treated through prescribed fire and approximately 22 percent would be mechanically treated (oak fuels treatment).

**270. The Wasatch-Cache National Forest should minimize human interference to preserve undeveloped lands.**

**Response:** We agree that one of the biggest existing challenges and one that will continue in the future is population growth and its effects on our resources and resource conditions. We recognize that humans are a component of these ecosystems, and we want to allow activities that sustain healthy resource conditions into the future. Therefore levels of use must be managed for this to occur. By establishing desired future conditions, goals, subgoals, and objectives we feel that we have laid the framework from which future management decisions can address these issues.

**271. The Wasatch-Cache National Forest should develop a comprehensive plan for ecosystem health and species viability.**

**Response:** Guideline 14 in the proposed plan lists, by cover type, the landscape structure and patterns of “healthy” or properly functioning conditions. Table VEG-4 in FEIS, Chapter 3, Topic 2 – Biodiversity and Viability, Vegetation identifies the acres of different vegetations that would be treated through various actions to help move these ecosystems toward these desired conditions. See R 269 for additional information.

**272. The Wasatch-Cache National Forest should address how land will be protected to maintain ecological function.**

**Response:** The Forest Plan focuses on moving toward properly functioning conditions, which include composition, structure, patterns and function of various ecosystems at a broad scale. The means to achieve and maintain ecological function are outlined through desired conditions, goals, subgoals, standards, and guidelines outlined in the Forest Plan.

**273. The Wasatch-Cache National Forest should consider noise pollution, erosion, and safety when protecting ecosystems.**

**Response:** We have not addressed noise pollution in this Forest Plan, but watershed protection is one of the factors we have addressed through a Watershed Health Goal, various subgoals, standards and guidelines. Human safety remains foremost in our concerns with users on the Forest.

**274. The Wasatch-Cache National Forest should define the term “ecological legacies.”**

**Response:** The term “ecological legacies” has been added to the Forest Plan glossary.

**Restoration**

**275. The Wasatch-Cache National Forest should protect and restore ecological integrity.**

**275.1 To offset the impacts of development on surrounding lands**

**275.2 To ensure clean water, clean air, and temperature management**

**275.3 For their intrinsic value**

**275.4 By restoring degraded and damaged areas**

**Response:** The direction provided in this Forest Plan puts primary focus on Properly Functioning Conditions of ecosystems across the Forest. We have taken into consideration, actions that occur on adjacent lands (federal, state, private, etc.) and viewed the role that this Forest plays in the context of surrounding land uses. The plan includes Forestwide direction (desired future conditions, goals and subgoals, objectives, and standards and guidelines) on managing the biological (plant and animal), physical (soil and water) and social resources that occur on the Forest. Restoration is integrated throughout management direction for many resources.

**276. The Wasatch-Cache National Forest should aggressively restore the historic range of variability.**

**Response:** This Forest Plan is focused on movement toward properly functioning conditions, which are those within the historic range of variability.

**277. The Wasatch-Cache National Forest should have timber harvest workers perform restoration work.**

**Response:** Various tools, including timber harvest, prescribed fire, and wildland fire use are identified as treatment methods to move various plant communities toward properly functioning condition.

**Effects of Activities/Disturbance**

**278. The Wasatch-Cache National Forest should allow activities only to the extent that they do not impair ecological integrity.**

**Response:** The focus of this Forest Plan has been to move the variety of plant communities toward properly functioning conditions and to allow activities that help achieve, or that do not interfere with reaching, those desired conditions.

**279. The Wasatch-Cache National Forest should recognize that fires, erosion, and landslides are normal.**

**Response:** Historically, fires, erosion and landslides occurred naturally on the landscape. However, because of various factors such as fire prevention many vegetation cover types have moved from fire condition classes 1 and 2 to condition classes 2 and 3, respectively (FEIS, Chapter 3, Topic 10 – Fire Management). There has been an increase in fuels to carry fires beyond their historic frequency and intensity. And because of increased human access, unnatural fire starts are more common. Various uses such as historical overgrazing and various early management actions have resulted in accelerated erosion and landslides that are outside the historic range of variation.

**Active Management**

**280. The Wasatch-Cache National Forest should allow active forest management.**

**280.1 To preserve forest health**

**280.2 To achieve an increase in water yield**

**280.3 To achieve multiple use objectives**

**280.4 To address the issue of carbon sequestration**

**280.5 To ensure firefighter safety**

**Response:** Active management is proposed to help improve forest health by moving various ecosystems toward properly functioning conditions, including a broader array of age class diversity among the different forested types. A result of this will likely be an increase in water yield where conifer communities are replaced by aspen. This management will allow for a broader compliment of habitat for wildlife, forest health, as well as forest products. Forest wide subgoals, and guidelines for large or coarse woody materials to provide for habitat and nutrient cycling are included in the Plan. More age class diversity within the forested types will reduce fire intensity and help to reduce the need for firefighters.

**Multiple Use Management**

Multiple Use Management General

**281. The Wasatch-Cache National Forest should adequately address the impacts of multiple use management.**

**Response 281:** Impacts of multiple use management (specifically motorized uses in this comment) are addressed in this FEIS to the degree that they can be for the broad land areas and required decisions to be made in Forest Plan revision. The FEIS displays broad sets of effects for each resource from each type of use. For summer motorized travel, site-specific environmental analysis is needed to change current Travel Management Plans for each Ranger District. The Revised Plan identifies as a priority Objective (see Revised Plan Chapter 4.A.3.) the need to update these specifically for the Ogden, Salt Lake, and Logan Ranger Districts because of issues raised here. It also includes criteria to be used during Travel Management Planning. In addition, the issue of education and enforcement was heard by the Forest Service and the Revised Plan sets specific priority Objectives for increasing these. For winter, the Revised Plan sets direction through Winter Recreation Class Maps to separate motorized and non-motorized uses in key areas in order to reduce conflicts between users and protect areas of critical big game winter ranges.

**282. The Wasatch-Cache National Forest should recognize that the proposed Forest Plan allows for balanced recreation and multiple use.**

**Response 282:** Thank you for expressing your support of the Proposed Forest Plan as an attempt to balance many competing uses.

**283. The Wasatch-Cache National Forest should recognize that the multiple use mandate has been met because there are enough areas that provide motorized use.**

**Response 283:** The range of alternatives in this FEIS provides for display of the differing effects of various options for winter motorized and non-motorized use areas. We believe the multiple use mandate has been met. Alternative 7 attempts to achieve some balance while providing for the growing demands for each type of use. Travel Management Plans provide the details of routes designated as open to motorized uses in summer. These are reflected as they currently exist in Recreation Opportunity Class Maps for the Revised Forest Plan. Based on many concerns about the adequacy of Travel Plans for some Ranger Districts, the Revised Plan includes a priority Objective to update these Plans as well as an Objective to increase education and enforcement.

**284. The Wasatch-Cache National Forest should recognize the cumulative impact of lost multiple use and recreation opportunities.**

**Response 284:** The FEIS addresses closure of roads in Chapter 3, Topic 3, under the heading “Road Maintenance and Decommissioning”. The effect of this on recreation and access is addressed in the FEIS in Chapter 3, Topic 4, under the heading “Effects on Recreation from Roads and Access Management.”

**285. The Wasatch-Cache National Forest should address the social, economic, and fairness issues related to exclusive use management.**

**Response 285:** The FEIS addresses the wide range of views about how the Wasatch-Cache National Forest should be managed through development, analysis and display of a broad range of “reasonable” alternatives and their effects on social and economic conditions as well as environmental conditions. These Alternatives incorporate various degrees of different uses, different types of access, and various levels of active management of the land and commodity production, while maintaining the basic productivity of that land. The degree of polarization among those who commented on the Plan is reflective of the wide diversity of people who use and care about the Forest. “Exclusive use” is not intended and is specifically addressed in Revised Forest Plan Chapter 4A.5. under the heading “Multiple Use and its application in Management Prescriptions”. The Revised Forest Plan has been designed to be consistent with the myriad of Laws that apply. Also, see Revised Forest Plan Chapter 1 for a discussion on how the Plan is guided by the 2002 Forest Service Strategic Plan (required under the Government Performance and Results Act).

Follow Traditional Multiple Use Management

**286. The final Forest Plan should include the definition of multiple use used in the Black Hills Forest plan.**

**Response 286:** The suggested definition of multiple use was clearly displayed both in the DEIS (Appendix D-1) and in the Proposed Plan (Chapter 4B). It is also displayed again in the FEIS (Appendix D-1) and in the Revised Forest Plan (Chapter 4.A.5).

**287. The Wasatch-Cache National Forest should continue traditional multiple use management.**

**287.1 To comply with congressional mandates**

**287.2 Because there are already enough wilderness areas**

**287.3 To allow the constructive use of resources**

**287.4 Because Forest Service experts are not adequately informed**

**287.5 To follow the will of the public**

**287.6 To prevent environmentalists from pushing their exclusive agenda**

**287.7 Rather than restricting uses**

**Response 287:** See Response 285.

**288. The Wasatch-Cache National Forest should continue traditional multiple use management for environmental reasons to achieve forest health.**

**Response 288:** See Response 285.

**289. The Wasatch-Cache National Forest should continue traditional multiple use management for recreational purposes.**

**289.1 To preserve the diversity of recreational opportunities**

**289.2 To accommodate heli-skiing**

**289.3 To accommodate motorized recreation**

**289.4 To accommodate hunting**

**289.5 To resolve use conflicts**

**Response 289:** Conflicts between different types of recreationists was identified early in the planning process as an issue that would need an array of different alternatives to address. Each of the 7 Alternatives included in the FEIS includes an explanation of how it addresses this issue. See FEIS Chapter 2 under the heading “Alternatives Considered in Detail” for this explanation. FEIS Chapter 3, Topic 3, Recreation provides a discussion of the effects of each alternative on various recreation uses.

**290. The Wasatch-Cache National Forest should continue traditional multiple use management for social reasons.**

**290.1 To protect family unity**

**290.2 To preserve remaining open spaces**

**290.3 To accommodate experiences for stress relief**

**290.4 To provide funds for education**

**290.5 To protect heritage resources**

**290.6 To preserve western culture**

**Response 290:** See Response 285.



## Topic 1: Watershed Health Management

### Soils, Water, and Geologic Resources

#### Soils Management General

**291. The Wasatch-Cache National Forest should restore full riparian function and soil storage capacity to protect water quality and quantity.**

**Response:** Thank you for your comment. The forest-wide desired condition for riparian areas as described under the Forestwide Desired Conditions in the revised Forest Plan states that riparian areas have a range of vegetative structural stages that are at or moving toward properly functioning condition (PFC). In this same section, the forest-wide desired condition is for soils have to have at least minimal protective ground cover, soil organic matter, and coarse woody material. It is expected that water quality and quantity are enhanced when riparian conditions are at PFC and soil productivity and quality are maintained or restored.

**292. The Wasatch-Cache National Forest should revise soil disturbance guidelines to incorporate scale and environmental sensitivity.**

**Response:** The scale is considered in the definition of an activity area which is described in the Glossary and Acronyms section of the DEIS.

**293. The Wasatch-Cache National Forest should revise the standard SI to include a clause based on potential soil erosion by soil classification on slopes between 20 and 40 percent.**

**Response:** The scale of soil mapping on the WCNF currently does not delineate slope groups between 20 and 40 percent. Because of this a forest-wide standard would not be appropriate. Clauses based on slope are best applied when more detailed site-specific soil information is obtained during project level analysis.

**294. The Wasatch-Cache National Forest should reduce the standard for soil displacement in an activity area.**

**Response:** The 15 percent standard is based on an estimate of the normal amount of natural variability and anything greater than 15 percent is assumed to be outside of this range and is most likely due to man's activity.

**295. The Wasatch-Cache National Forest should recognize that maintaining existing soil productivity and water quality is unattainable under the proposed plan.**

**Response:** As defined in the Glossary, the Multiple Use Sustained Yield Act of 1960 guides the management of the WCNF in that the surface resources of the national forests is to be utilized in a combination that will best meet the needs of the American people without impairment of the productivity of the land. This act and the regulations guiding the mission of the Forest Service recognizes that some site specific effects to the land and water resources may occur from multiple use

activities but the overall productivity of the land and quality of the water is not degraded.

### Special Soil Communities

**296. The Wasatch-Cache National Forest should adequately consider cryptogamic crusts.**

**Response:** There is very limited information on the distribution of cryptogamic crusts and their role on the Wasatch-Cache National Forest. Additional analysis has been completed on the potential occurrence of, and impacts to, cryptogamic crusts and is included in **Chapter 3, Botanical Resources**. This new analysis and assessment identified areas of the Forest with the greatest potential for cryptogamic crusts and the effects from different uses in each alternative on those crusts. The Stansbury Mountains have the greatest potential for cryptogamic crusts because of the soil and vegetation characteristics. Because there is not a great difference in how the Stansbury Mountains are managed between alternatives with regard to livestock grazing and road and trail construction and subsequent unauthorized ORV use, there is little difference in potential impacts among alternatives to cryptogamic soil crusts.

**297. The Wasatch-Cache National Forest should avoid disturbing tundra and talus soils.**

**Response:** Most of the alpine communities on the Wasatch-Cache National Forest occur in designated wilderness. Talus slopes can occur at any elevation, but many of these also occur within designated wilderness. The greatest potential for additional impacts is in the upper portions of ski areas on the Forest. Site-specific assessments and analyses of any activities in these areas will be done to determine their potential impacts. We agree that the alpine ecosystems are fragile and that they warrant greater protection than most other ecosystems on the Forest. Talus communities at higher elevations provide important habitat for some wildlife species as well and impacts to associated rare plants and animals will be avoided.

### Geologic Resources Management

**298. The Forest Plan should adequately and consistently discuss geologic units.**

**298.1 By adding an appendix on geologic units**

**Response:** We agree that geological information is important for mineral potential. However, for the decisions made at the Forest Plan scale, broad-scale geological information is used. It is the intent of the Forest Plan revision analysis to focus its attention on the major issues relating to Forest Planning. Detailed geological information is used in site-specific, project-level analysis when issues relating to geology are identified.

**298.2 By providing a map showing where geologic units exist**

**Response:** Although geology is not directly referenced in the DEIS, we relate occurrence of vegetation communities in terms of ecological subregions that uses

geology as a basic foundation. For a detailed description of the geology of ecological subregions, see McNab and Avers (1994) that is referenced in the section Broad Scale North-South Coniferous Corridor in the Affected Environment section of Topic 2- Biodiversity and Viability of the DEIS.

#### Aquatic Resources Management General

**299. The Wasatch-Cache National Forest should protect riparian areas to preserve water quality.**

**Response:** The proposed Forest Plan protects riparian areas through the use of standards such as those under Standards and Guidelines for Watershed Health and Biodiversity and Viability. Site-specific projects and mitigation such as placing troughs a distance from a spring would be analyzed through a project analysis and is not addressed at the planning level.

For example, in the Standards for Road/Trail and Access Management in Forest Management Direction section of the proposed Forest Plan, a standard states that ‘summer motorized and mechanized access is managed on an “open on designated routes” basis’. This standard is carried through the more site-specific analysis for Ranger District Travel Plans where decisions regarding management of motor vehicle access and areas where motorized use is allowed are identified on specific areas. For example, the Salt Lake District travel plan states that all areas and routes are closed to motorized use unless designated as open. The travel plan allows motor vehicles on designated roads and trails, but not off of these routes, thereby protecting riparian areas. The Standards for Road/Trail and Access Management in Forest Management Direction section of the proposed Forest Plan, also provides protection for riparian areas through the use of Best Management Practices during construction and maintenance of roads, trails, and facilities.

#### Water Quality

**300. The Forest Plan should state that the Forest Service will not impose more regulations regarding water quality than are already legally imposed by Salt Lake City.**

**Response:** The WCNF recognizes the states of Utah and Wyoming has regulatory authority over water quality within the respective states. Although the WCNF is not considering imposing more stringent or inconsistent regulations regarding water quality, we don’t feel that we need to explicitly state this.

**301. The Wasatch-Cache National Forest should provide reference to more information on aquatic resources and water quality conditions and trends, including streams that are impaired and/or in need of improvement.**

**Response:** In addition to listing state assessed impaired water bodies under the section Water Quality in Topic 1, Watershed Health of the DEIS, watersheds containing resource concerns are listed in the section Watershed Condition Assessment that include streams that need improvement.

**302. The Wasatch-Cache National Forest should protect water quality from nitro aromatic compounds.**

**Response:** On 04/10/2002, Charles Condrat, WCNF hydrologist talked to Ryan Rowland and Dave Naftz of the US Geological Survey regarding the nitroaromatic compound (NAC) study. They said the work done was a preliminary study that sampled NAC s in snow, soil, and lake sediments. He said that the snow and soil samples contained measureable amounts of NACs but not NACs were found in lake sediments. They said the study has a very small amount of data and that there is not enough information in which to set standards. Since there is very little data to support setting standards, standards for NACs in the Forest Plan would not be appropriate.

**303. The final Forest Plan should include critical nitrogen load standards, based on research protocols developed for Colorado wilderness areas.**

**Response:** The WCNF has a water quality monitoring program in cooperation with the State of Utah as described in the Water Quality section on Topic 1, Watershed Health of the FEIS. Nitrogen is one of the parameters analyzed in the water quality monitoring program and has not been found to exceed State standards in water bodies sampled on the WCNF. Setting critical load standards for nitrogen is not needed on the WCNF at this time.

**304. The Wasatch-Cache National Forest should recognize the negative effects of sediment on the treatment of surface water.**

**Response:** The WCNF has a cooperative water quality program with the State of Utah and samples are analyzed for sediment. Turbidity measurements have been effective for monitoring site-specific projects. For forest planning, water quality is assessed at a broad scale in order to plan actions to protect, maintain, or improve water quality.

**305. The Wasatch-Cache National Forest should adequately address the issue of sewage spills into drinking water.**

**Response:** In response to your comment, Florence Reynolds, water quality administrator for Salt Lake City (SLC), was contacted regarding sewage overflows that have occurred in the sewer systems in the canyons east of SLC. Florence said that since sewer systems have been operating, SLC has had two sewage overflows that were caused by ground surface activities near the sewer lines. Both were caused by dirt and gravel dumped into the sewer that caused a backup of sewage. The sewage overflows were caused by a construction project and by road maintenance. SLC water treatment plant was shut down immediately after being notified of the spills and operations resumed after the potential for contamination of the treatment plant had passed. The pipe itself is in good condition but it is other activities that have affected the sewer. Water quality has been very good before and after the sewer was installed in spite of the increase in the use and development of the canyons. The waste that has been taken out of the canyon through the sewer system contributes to the constant very high water quality in the canyons.

**306. The final Forest Plan should assure non-degradation of state category 1 streams to comply with Utah State Code R317-2-3.2.**

**Response:** The WCNF is required by State law to meet anti-degradation requirements. The Forest Plan has many standards and guidelines that provide means to meet anti-degradation requirements such as standards 1 through 5, 16, 17, 19, and guidelines 1 through 10 in the FEIS.

**307. The Wasatch-Cache National Forest should specify whether lakes listed with water quality problems are reservoirs.**

**Response:** Pineview Reservoir is a reservoir, China Reservoir and Tony Grove Lake are natural lakes with a dam to raise their water level. Bridger Lake, Marsh Lake, Lyman Lake, and Mirror Lake are natural lakes.

Water Quantity

**308. The Wasatch-Cache National Forest should enhance water production.**

**308.1 By studying rivers, streams, and watersheds for maximum output and benefits**

**308.2 By not recommending management prescription categories or wilderness designations that would detract from enhancing water production**

**Response:** Enhancement of water yield from the WCNF is discussed under the section Effects on Soil and Water Resources from Timber Harvest/ Vegetation Treatments and in the cumulative effects section of Topic 1, Watershed Health. The effects analysis discusses limitations on enhancing water yield and the Forest Service has carefully considered water yield increases with other resource needs. Increasing water yield on the WCNF is one of many strategies to address water needs in Utah and Wyoming. The cumulative effects section describes that State water development plans include several strategies for meeting water needs in Utah and Wyoming.

**309. The Wasatch-Cache National Forest should recognize the potential for increased water yield and resulting channel degradation from certain activities.**

**Response:** See response 308.

**310. The Wasatch-Cache National Forest should adequately address the issue of decreased water yield associated with declining aspen stands and growing conifer stands.**

**Response:** In response to your comment a general statement regarding reduction in water yield is included in section Surface Water under Topic 1, Watershed Health. A detailed water yield analysis is not appropriate for the Forest Plan revision because forest planning is at a broad scale, which has many limitations as described in the section Effects on Soil and Water Resources from Timber Harvest/ Vegetation Treatments in Topic 1, Watershed Health.

Watershed Health Management General

**311. The Forest Plan should recognize the Department of Interior's withdrawal of specific National Forest System lands for the purposes of the Provo River Project and the Provo River Channel Revision.**

**Response:** The Forest Service recognizes that the Department of Interior withdrew lands for purposes of the Provo River Project and recognizes the right of the Provo River project to operate its lands and facilities. The Forest Plan Revision DEIS and Proposed Plan never intended to alter the operations of the PRWUA and that nothing in the proposed plan revision is expected to restrict the PRWUA from managing its operations within their authority.

**312. The Wasatch-Cache National Forest should protect watersheds.**

**Response:** Thank you for your comments. Watershed concerns are identified in Issue #5 and considered in alternatives in the FEIS and in desired future conditions, goals, and standards and guidelines in the revised Forest Plan.

**312.1 From the pressures of population growth**

**Response:** Population growth is a factor that is considered in the cumulative effects section of Topic 1, Watershed Health in the FEIS.

**312.2 To preserve the water supply for a growing population**

**Response:** Thank you for your comment. The canyons east of Salt Lake City are important public supply watersheds and are recognized as such in the section Water Quality and in the cumulative effects section under Topic 1, Watershed Health.

**312.3 To protect groundwater supplies**

**Response:** Thank you for your comment.

**312.4 To hold water for continuous flow**

**Response:** Thank you for your comment. The ability of land to hold water and provide water flow during drier periods of the year is described in section Wetlands, Riparian Areas, and Floodplains in Topic 1, Watershed Health.

**312.5 By designating sensitive or damaged watersheds and directing future management accordingly**

**Response:** The FEIS identifies watersheds and resource concerns in Table WA-2 and the revised Forest Plan identifies priority areas for management activities to address livestock grazing impacts under the section Forest Objectives.

**312.6 By prohibiting any activities that degrade watershed health**

**Response:** Thank you for your comments. The WCNF provides for multiple use and the FEIS recognizes that some activities have impacts on Watershed Health. The ten Watershed Health guidelines, with the exception of Guideline 9, are guidelines because they are not binding limitations placed on management activities, but are preferred or advisable actions. Deviation from these guidelines

will be documented in the appropriate analysis. In the FEIS, G9 is changed to a standard because, by definition, Soil and Water Conservation Practices are required during project implementation.

**312.7 Rather than focusing on recreation management**

**Response:** The WCNF provides for multiple use and recreation is a very important activity in the Tri-Canyon area. The alternatives provide a range of uses on the WCNF including those in the Tri-Canyon area.

**313. The Wasatch-Cache National Forest should rehabilitate existing watershed problems rather than increase uses on roadless lands.**

**Response:** Thank you for your comment. The reason for the subgoal “identify watersheds not in properly functioning condition” is that resource problems in individual watersheds are very site-specific and cause specific and more detailed information on the ground is needed to evaluate solutions to the resource problems.

**314. The Final EIS should provide a map depicting current watershed status.**

**Response:** Thank you for your comment. A map of watersheds has been added to the FEIS.

**315. The Wasatch-Cache National Forest should consider adding the Mount Aire drainage to the Salt Lake City watershed.**

**Response:** Thank you for your comment. The cumulative effects section describes activities at a broad scale on lands adjacent to the WCNF including Salt Lake City Watershed Plan.

**316. The Final EIS watershed section should reference the Federal Multi-Agency Source Water Agreement.**

**Response:** Thank you for your comment. This reference has been included in the FEIS.

Adequacy of Analysis

**317. The Wasatch-Cache National Forest should establish benchmark landscape level watersheds as research control areas.**

**Response:** Various uses on the Forest, including livestock grazing and OHV use among others, have had and continue to have impacts on vegetation and associated watershed conditions. An assessment of wildlife habitats is only done at a broad scale with this plan revision. While the forest has some information on forest structure and how it relates to goshawk habitat, we have not collected detailed monitoring data on vegetation undergrowth characteristics that could affect goshawk habitat. The understanding of unaffected conditions would be aided by the use of existing and proposed Research Natural Areas (RNAs) and Special Interest Areas (SIAs) as well as some areas within wilderness or proposed wilderness. We have proposed an expansion of the Morris Creek RNA and have proposed new SIAs for botanical purposes and for restoration ecology research. We

have also identified other areas as possible additions to the RNA/SIA system in FEIS, Chapter 3, Topic 8.

**318. The Wasatch-Cache National Forest should provide detailed strategies regarding water management in the final Forest Plan.**

**Response:** Water Planning is a statewide issue and the FEIS references the state of Utah and Wyoming in the cumulative effects section. State planning describes several management strategies for providing water. Additional information on water yield opportunities and limitations are discussed in the section Effects on Soil and Water Resources from Timber Harvest/ Vegetation Treatments.

**319. The Wasatch-Cache National Forest should determine the current regime for watershed management before measuring the degradation of those regimes.**

**Response:** Thank you for your comment. Additional information will need to be obtained for site-specific projects that may affect these resources.

**320. The Wasatch-Cache National Forest should provide an adequate analysis of erosion processes in canyon streams.**

**Response:** The section Geologic Hazards in Topic 1, Watershed Health of the FEIS, Utah is among eight states with a “severe” landslide hazard rating. The reference by Harty describes debris flows after intense thunderstorm events as exiting steep canyons such as those in Davis County and near Willard, Utah. In order to clarify the meaning, the term “flash flood” is changed to “debris flow” in the section Current Conditions under Revision Topic 1, Watershed Health in Chapter 2 of the Revised Forest Plan. Alluvial fans are formed by debris flows exiting steep canyons and depositing on a on a lower gradient slope in the valley. This is shown in Harty’s publication in a figure showing debris flow deposit forming an alluvial fan at the mouth of a steep canyon.

**321. The Wasatch-Cache National Forest should provide a more detailed discussion of the effects of Alternative 2 on watershed condition to answer feasibility questions.**

**Response:** The effects described in section Effects on Soil and Water Resources from Livestock Grazing under Topic 1, Watershed Health in the DEIS refer to effects on soil and water resources from livestock grazing. From comments on the DEIS, the effects were again reviewed and the conclusion made that effects from livestock grazing would be similar between most alternatives. These effects are described in the FEIS. Assumptions on budget are in FEIS Chapter 2, under Forest Plan revision outputs and services. The Forest Plan gives broad-scale planning for the WCNF and does not make site-specific decisions. A detailed description of effects on individual flora and fauna is not appropriate at this scale of planning because no site-specific actions are proposed or specific actions decisions are made.



Effects of Activities/Disturbance

- 322. The Wasatch-Cache National Forest should adequately analyze the effects of ski resort trash accumulation and avalanche control activities on watershed health.**

**Response:** The Forest Plan revision addresses broad-scale planning for the entire WCNF. The issues you raise are best addressed during project-level planning and/or during review of ski area annual operating plan when site-specific actions can be identified to remedy the problem.

- 323. The Wasatch-Cache National Forest should recognize that road building and grazing cause more erosion than off-road vehicles.**

**Response:** Road building, grazing and ATV use can cause erosion and the amount of erosion is dependent upon many factors including the amount of use, slope steepness, type of soil, soil conservation measures in place to reduce erosion. The FEIS describes these effects on a broad-scale. However, at the Forest Planning scale it is not appropriate to make general statements about one use resulting in less erosion than another because of the many factors involved. Differences between amount of erosion due to different activities is more appropriate at the site-specific project level scale of analysis.

- 324. The Wasatch-Cache National Forest should recognize that the magnitude of sediment transport attributable to reasonable use by motorized recreationists is relatively insignificant compared to the magnitude of natural sediment transport.**

**Response:** Motorized recreation use can cause erosion and the amount of erosion is dependent upon many factors including the amount of use, slope steepness, type of soil, soil conservation measures in place to reduce erosion. The FEIS describes these effects on a broad-scale. However, at the Forest Planning scale it is not appropriate to make general statements about the amount of erosion from motorized recreation compared to natural since many factors are involved in the analysis that is appropriate at the site-specific project level scale of analysis.

- 325. The Wasatch-Cache National Forest should recognize the benefits of flooding on streams.**

**Response:** Thank you for your comment. The benefits of floodplains are recognized in the section Wetland, Riparian Areas, and Floodplains in Topic 1, Watershed Health.

- 326. The Wasatch-Cache National Forest should prohibit snowmaking.**

**Response:** The decision to permit snowmaking at Alta was made after a site-specific analysis of the Alta master development plan. This is the appropriate analysis for a decision on allowing snowmaking because it is site-specific.

**327. The Wasatch-Cache National Forest should adequately study the effects of snowmaking activities on instream flows.**

**Response:** The decision to approve withdrawals of water for snowmaking is based on a site-specific analysis using the expertise of hydrologists and fisheries biologists. In the record of decision for the Solitude Master Development Plan Update, an instream flow study is required as part of mitigation for effects of snowmaking withdrawals on Big Cottonwood Creek.

**328. The Wasatch-Cache National Forest should restrict the importation of water from outside sources to enhance private development in the Tri-Canyon area.**

**Response:** Thank you for your comment.

**329. The Wasatch-Cache National Forest should amend the Forest Plan and EIS to reflect the fact that the impacts of diversions through the Duchesne Tunnel are not significant.**

**Response:** We understand that there is disagreement regarding the significance of the impacts from the Provo River Project. We feel that the Provo River Project has had significant effects on the Duchesne River below the Duchesne Tunnel Diversion and on the Provo River below the outlet of the Duchesne Tunnel. Although the Upper Provo River Easement Maintenance Plan reaches the conclusion that no significant effects have occurred, based primarily on a hydrologic and hydraulic study, many other effects of increased flows are not discussed such as effects of movement of channel substrate on river organisms and the effects of stream bank erosion on downstream channel stability. These are a couple examples of many effects that have been identified in augmented water channel systems. However, the Forest Plan revision process addresses broad-scale planning for the entire WCNF and not site-specific projects such as the PRP. Since it was never the intent of the Forest Plan revision to make a decision affecting the current management of the PRP, it is not appropriate to conduct a detailed analysis of the PRP for the Forest Plan Revision.

**330. The Wasatch-Cache National Forest should explain the environmental and economic impacts of any reduction in Duchesne tunnel diversions.**

**Response:** The Forest Service recognizes that the Duchesne Tunnel diversions as an important source of municipal, industrial, domestic, and irrigation water for more than one million people. DEIS does not explain the environmental and economic impacts of any reduction in Duchesne Tunnel diversions because the final Plan does not restrict operations of the Provo River Project.

**331. The Wasatch-Cache National Forest should clarify plans to implement alternative methods of water diversions.**

**Response:** The Forest Plan revision addresses broad-scale planning for the entire WCNF. There are many factors that affect the decision on snowmaking, water withdrawals, dams, construction, transbasin diversions, and the authority of the Forest Service. Some of these factors are location of withdrawal point, amount of flow, amount of withdrawal needed, water right, ownership of land, and

environmental effects. These factors are very site specific and vary depending upon the location of the point of withdrawal and where or if it crosses Forest System Lands. The issues you raise are best addressed during project-level planning when site-specific alternatives and mitigation can be identified to come up with the best solution.

Access to Utility Infrastructure

- 332. The final Forest Plan should allow continued motorized access to alpine lakes that supply water to the Ogden area.**

**Response:** See response 335.

- 333. The final Forest Plan should recognize the Provo River Water User's Association's right-of-way from the Mirror Lake Highway to the Duchesne Diversion.**

**Response:** The Forest Service recognizes PRWUA's right to continued year-round motorized access along the gravel road that extends from the Mirror Lake Highway to the Duchesne Diversion. In addition, the Forest Service recognizes PRWUA need to have access to existing repeater sites.

- 334. The final Forest Plan should not restrict motorized access to any Provo River Water User's Association infrastructure.**

**Response:** The Forest Service recognizes PRWUA's need for continued winter access to a variety of locations within the Wasatch-Cache Forest by helicopter, snowmobile and snow cat on very short notice for the purpose of monitoring snowpack conditions and forecasting snow melt runoff.

- 335. The final Forest Plan should explicitly mention the Central Utah Water Conservancy District's motorized access rights to its dam facilities in the Upper Provo drainage.**

**Response:** The Forest Service recognizes the need for access to Federal facilities for which you have contractual obligations with the US Bureau of Reclamation. The Forest Plan does not intend to alter your operations and nothing in the plan is expected to restrict you from managing your existing operations.

- 336. The final Forest Plan should not restrict motorized access to any Bureau of Reclamation projects.**

**Response:** See response 335.

- 337. The final Forest Plan should not restrict year-round motorized access to any hydroclimatic snow survey data stations.**

**Response:** See response 335.

Other

- 338. The Forest Plan should acknowledge and present the reconstruction of the Trial, Lost, and Washington dams and the resulting stabilization of 12 connected lakes.**

**Response:** This Information is summarized in the FEIS in the section under Western Management Area Descriptions under Topic 1, Watershed Health.

## Air Resources

Air Resources Management General

- 339. The Wasatch-Cache National Forest should recognize that the desired condition regarding smoke emissions is not attainable.**

**Response:** As described under the section Resource Protection Measures under Topic 1, Air Resources, the WCNF coordinates with the State of Utah Department of Air Quality to mitigate the effects on public health, public safety, and visibility. These efforts should be adequate to meet State air quality standards.

Adequacy of Analysis

- 340. The Wasatch-Cache National Forest should calculate off road vehicle emissions and obtain an air permit under the Clean Air Act.**

**Response:** Additional information on effects of 2-stroke engines on air quality has been included on the FEIS in the section Effects on Air Quality from Snowmobiles under Topic 1, Air Resources. This analysis assumes that the air quality conditions due to snowmobiles in the Yellowstone study is worse than those on the WCNF because the overall amount of use and the uses in concentrated areas is less on the WCNF than at Yellowstone. It is expected that the conclusions in the section Effects on Air Quality from Snowmobiles also apply to ATVs and dirt bikes since air quality conditions in Utah are generally worse in the winter than in the summer.

Effects of Activities/Disturbance

- 341. The Wasatch-Cache National Forest should recognize that off road vehicles don't cause major air pollution problems.**

**Response:** Additional information on effects of 2-stroke engines on air quality has been included on the FEIS in the section Effects on Air Quality from Snowmobiles under

- 342. The Wasatch-Cache National Forest should restore trees in valley areas to mitigate the effects of global warming.**

**Response:** Thank you for your comments.

- 343. The Wasatch-Cache National Forest should recognize that humans cause only 5 percent of greenhouse gases.**

**Response:** Thank you for your comments.

## **Topic 2: Biodiversity and Viability Management**

### **Biodiversity and Viability Management General**

#### **Management General**

- 344. The Final EIS should include a strong standard of viability to ensure the sustainability of all native species.**

**Response:** NFMA requires the FS to “provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives” (NFMA Sec.6(g)(3)(B)). This translates into 36CFR 219.19’s requirement to “maintain viable populations of existing native and desired non-native vertebrate species in the planning area.” These requirements make a specific standard unnecessary.

- 345. The Wasatch-Cache National Forest should revise the definition of viability.**

**Response:** We have revised the definition in the glossary to match the intent of 36CFR 219.19 that states, “A population which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area.” It must be realized, however that there are some species such as the yellow-billed cuckoo that the state has identified as not breeding in the state that will be classified as not viable on the Forest because of this definition. These are species where the Forest is on the edge of their range and distribution across the Forest and/or breeding will not likely ever occur as is written in the definition.

- 346. The Wasatch-Cache National Forest should give priority to biodiversity and species viability.**

**Response:** This commenter was pleased that the Forest was giving priority to biodiversity and species viability. Thank you for your comment.

- 347. The Wasatch-Cache National Forest should adequately discuss disturbance ecology and ecosystem resiliency.**

**Response:** A section on disturbance ecology and ecosystem resiliency has been added to the Topic 2 – Biodiversity and Viability Section, Vegetation section.

- 348. The final Forest Plan should include actions to ensure viability of biological communities. The Forest should add specific goals, objectives, standards, guidelines and mitigation measures.**

**Response:** We have goals, objective, standards, and guidelines to ensure the viability of biological communities. MIS are used to see if we are moving in the right direction with the management of those communities.

**349. The final Forest Plan should improve the discussion of historic range of variation. Recognizing that climate change precludes reestablishment of many native ecosystems**

**Response:** While we recognize that climate changes are occurring, to date we have not seen any of our native ecosystems fail to reestablish following disturbance, unless those disturbances have been extreme and outside historic levels.

**Adequacy of Analysis**

**350. The Wasatch-Cache National Forest should conduct microsurveys of flora and fauna.**

**350.1 To identify geographical components of biodiversity.**

**Response:** Table VEG-1 in the FEIS displays different cover types by ecological sections on the Forest.

**350.2 To maintain healthy ecosystems.**

**Response:** While microsurveys could improve our understanding of biodiversity and ecosystem functions, we have not had the ability to conduct them and feel that, at the forest plan level, direction is provided that will manage for healthy ecosystems and for biodiversity.

**Effects of Activities/Disturbance**

**351. The Wasatch-Cache National Forest should assess continuing impacts of specific activities and compensate for them to effectively ensure population viability.**

**Response:** The purpose of MIS is to assess impacts of activities on wildlife populations. If population trends of MIS decrease on the Forest all activities that might affect the decline will be assessed to determine the cause and appropriate action taken.

**352. The Wasatch-Cache National Forest should establish controls on grazing and motorized recreation in research forest areas to ensure research results on silviculture are not distorted.**

**Response:** The Forest recognizes that silviculture treatments recommended as a result of research conducted on one part of the Forest should not be applied to all ecosystems across the Forest. We also recognize that research has evolved and will continue to change in the future. We can only use the most recent and best information we have to make resource management decisions. We will continue to manage grazing and motorized recreation to limit their impacts to experimental forests.

## Wildlife

### Wildlife General

**353. The Wasatch-Cache National Forest should address wildlife management.**

**353.1 By not allowing human uses of the forest to influence wildlife management direction**

**Response:** By law the Forest Service is a multiple use agency and to that end decision makers within the Forest Service strive to find balance to the many uses on the Forest. This balance is different from forest to forest and even district to district on a given Forest. Knowing that every square foot cannot be managed for every use prescriptions have been assigned to different areas on the Forest where a particular use will be emphasized but not used exclusively for that prescription. With this approach we can better work with state wildlife agencies to help meet their management direction.

**353.2 By taking an active role in managing wildlife, especially in managing non-native species.**

**Response:** The Forest Service role in wildlife management including the management of non-native species is outlined in 36 CFR 219.19 and Forest Service Manual 2600.

**353.3 By addressing conflicts between guidelines for management of specific species**

**Response:** We have tried to eliminate any conflicts between guidelines for management of specific species and continue to look for any remaining conflicts.

**353.4 By making recommendations regarding the appropriateness of wildlife transplants**

**Response:** This is done through a Memorandum of Understanding with the Utah Division of Wildlife Resources according to direction in Forest Service Manual 2640.

**353.5 By considering predator control and the reintroduction of bighorn sheep**

**Response:** Predator control is conducted by APHIS-Wildlife Services. Their Environmental Assessment for Northern Utah allows work to protect wildlife after transplant or on important use areas, such as fawning areas, at the request of the Utah Division of Wildlife Resources.

**354. The final Forest Plan should include actions to ensure species viability by adding specific goals, objectives, standards, guidelines and mitigation measures.**

**Response:** See response 344 above.

**355. The Wasatch-Cache National Forest should increase monitoring requirements for species population and habitat trends.**

**355.1 By adding protocols and numbers of sites**

**Response:** Protocols and number of sites for management indicator species are discussed in Appendix J. Other species and species groups are monitored with accepted protocols with the number of sites that the budget allows. The Forest also uses inventory and monitoring information from other agencies such as the Utah Division of Wildlife Resources.

**355.2 By increasing frequency and site requirements for threatened and endangered and management indicator species**

**Response:** Monitoring threatened and endangered species is done in coordination with the Fish and Wildlife Service and the State. Management indicator species are monitored as identified in Chapter 5 of the Revised Forest Plan and in Appendix J of the FEIS.

**356. The Wasatch-Cache National Forest should clarify its criteria for wildlife introductions.**

**Response:** Wildlife introductions are covered in Forest Service Manual 2640.

**357. The Wasatch-Cache National Forest should recognize that the presence of humans pushes out other species.**

**Response:** We recognize this. This is why we have prescriptions assigned to different areas of the Forest that limits certain activities within the prescription area. See the Revised Forest Plan, Chapter 4 (B) Forestwide Allocations for the discussion and definition of prescription areas.

**358. The Wasatch-Cache National Forest should protect humans over wildlife.**

**Response:** Forest Service policy puts human safety above wildlife. The Standard is listed under Fire and Fuels Management in Chapter 4 of the Revised Forest Plan

Adequacy of Analysis

**359. The Wasatch-Cache National Forest should add supporting data and habitat analysis to the viability section of the Final EIS.**

**Response:** This has been done.

**360. The Wasatch-Cache National Forest should conduct appropriate data collection for the species viability analysis and potentially use modeling.**

**Response:** This is done opportunistically as budgets allow. The other approach to viability is ecological sustainability and this is discussed in Appendix 2-B. Regulations do not specify how viability is to be dwelt with, only that we must manage habitat to “maintain viable populations of existing native and desired non-native vertebrate species in the planning area.”

**361. The Final EIS should include an analysis of anticipated changes in habitat components and discuss quantity, quality, and distribution.**

**Response:** This has been done.



**362. The Wasatch-Cache National Forest should consider the effect of possible mortality of wildlife in oil pits.**

**Response:** The only pits used in oil and gas operations on the Forest are settling ponds for water used in the drilling of new wells. After use they are buried and rehabilitated. There are no oil pits on the Forest.

**363. The Wasatch-Cache National Forest should clarify the benefits of reduced tree density to wildlife.**

**Response:** The section on “The Effects on Terrestrial Wildlife From Oil and Gas Activities has been rewritten and the statement is no longer in the document.

**364. The Wasatch-Cache National Forest should revise the section regarding effects to terrestrial wildlife from roads management by adding an explanation that some species of wildlife are more sensitive to disturbance than others.**

**Response:** The words, “...and the species of wildlife,” have been added to the second sentence along with another sentence of further explanation.

Wildlife Habitat

**365. The Wasatch-Cache National Forest should determine acres of high quality habitat by vegetation type.**

**Response:** The question is, “high quality habitat” for what species? Goshawk and snowshoe hare both use the same vegetation type but different age classes. To identify “high quality habitat” one enters into single species management, which is not practical both from the number of species that have habitat on the forest and from the budget aspect. These are reasons why we chose a coarse filter ecological sustainability approach in dealing with species-at-risk.

**366. The Wasatch-Cache National Forest should protect critical habitat.**

**366.1 By providing adequate direction for wildlife habitat management**

**Response:** This has been done.

**366.2 By giving priority to actions that enhance habitat**

**Response:** This is done through management goals and objectives that guide management in the direction of properly functioning condition within the historic range of variability.

**366.3 By preserving large tracts of land**

**Response:** The Forest presently has 310,500 acres of wilderness which is 40% of all Forest Service administered wilderness in the state of Utah. Alternative 7 recommends another 61,400 which, if Congress chooses to act, would bring the total acreage on the Forest to 371,900 acres which would be 45% of wilderness on National Forest System lands in Utah. There are also roadless areas and Research Natural Areas that protect important habitats.

**366.4 By tying the monitoring of aquatic resources to specific management implementation**

**Response:** Aquatic resources are monitored on a Forest wide basis through a revolving schedule outside of Forest Plan implementation monitoring.

**366.5 By maintaining aquatic habitat through the application of Management Prescription Category 3.1**

**Response:** Management Prescription 3.1 has been applied wherever it was determined to be the most important prescription for an area. We thank you for your comment.

**367. The Wasatch-Cache National Forest should establish habitats as Sanctuary Preserve areas to protect specific species.**

**Response:** Refer to Appendix B for a discussion of species-at-risk and the measures taken to protect them and ecosystem sustainability.

**368. The Forest Plan should include the information in the Utah Division of Wildlife Resources' databases regarding wildlife habitats and streams to protect and enhance wildlife habitat.**

**Response:** The Forest has used information from the UDWR in the planning process and is continually coordinating with them on individual project proposals.

Wildlife Corridors

**369. The Wasatch-Cache National Forest should preserve wildlife habitat corridors.  
369.1 By restoring wildlife habitats within the context of eco-regional planning.**

**Response:** The Forest is moving in this direction by working for properly functioning condition for all vegetation types within the historic range of variability.

**369.2 By protecting habitat corridors between forest areas**

**Response:** See 369.1 above.

**369.3 By protecting national forest lands sufficiently to offset adverse effects caused by management practices on private lands**

**Response:** The Forest does this where possible. In the Bear River Range, however, approximately 2/3 of the lands within the Congressional boundary are of other ownership which severely limits any offsetting adverse effects.

**369.4 By prohibiting extractive uses, motorized vehicles, and grazing in wildlife corridors**

**Response:** By law the Forest Service is a multiple use agency. The Forest Plan is designed to help decision makers find the proper balance of uses in the management of the National Forest. The Management Prescriptions discussed in Chapter 4 of the Revised Plan and their application to Management Prescription Maps show

where certain uses will be emphasized. Management Prescriptions, however, do not denote exclusive use since the law mandating multiple use still applies.

**370. The Wasatch-Cache National Forest should adequately address the effects of habitat fragmentation on native wildlife populations.**

**Response:** This has been done in Chapter 3 of the FEIS.

**371. The Wasatch-Cache National Forest should address the effects of wildlife corridor protection on grazing allotments.**

**Response:** With standards and guidelines for forage utilization, management direction that leads to properly functioning condition within the historic range of variability, and proper management of livestock through allotment management plans corridors (both local between winter and summer range, and the large regional corridor that has been identified) can be maintained with livestock grazing in place along with other aspects of multiple use.

**372. The Wasatch-Cache National Forest should close big game migration routes during the winter months.**

**Response:** Protection of big game migration routes and important winter ranges is covered in Travel Management Plans.

**373. The Wasatch-Cache National Forest should not manage for wildlife corridors, because corridor preservation limits multiple use.**

**Response:** See the response to 371 above.

Native and Non-Native Species

**374. The Forest Service should make native biodiversity the primary goal and organizing paradigm of management.**

**Response:** Native biodiversity is very important to the Forest and we work with other agencies within the scope of 36 CFR 219.19 and Forest Service Manuals to this end.

**375. The Wasatch-Cache National Forest should adequately address the management of non-native wildlife.**

**375.1 By removing non-native species**

**Response:** Forest Service policy on non-native species is set in 36 CFR 219.19 and Forest Service Manual 2640.

**375.2 By prohibiting the introduction of non-native species**

**Response:** Forest Service policy on non-native species is set in 36CFR 219.19 and Forest Service Manual 2640.

**376. The Wasatch-Cache National Forest should recognize mountain goats as a non-native species.**

**Response:** Whether native or non-native, mountain goats are present and have been since placed in the Twin Peaks area of Little Cottonwood Canyon in 1967. With them being present the Forest follows Forest Service Manual (2642) direction.

**377. The Wasatch-Cache National Forest should clarify its actions regarding non-native goats.**

**Response:** See response on # 376, above.

Game Species

**378. The Wasatch-Cache National Forest should protect big game species on an equal basis with other species.**

**Response:** The desired condition of the wildlife resource is found in Chapter 4 of the Revised Forest Plan and addresses all species of wildlife without regards to any special classifications such as “big game.” Where certain components of a “groups” or a species habitat is not in properly functioning condition and/or outside of its historic range of variability they may be addressed in specific goals, objectives, standards, and guidelines.

**379. The Wasatch-Cache National Forest should protect and enhance big game winter ranges by closing big game winter migratory routes to human uses.**

**Response:** This has been done on different areas on the Forest and is accomplished through travel plans.

**380. The Wasatch-Cache National Forest should recognize the impact of elk on deer populations.**

**Response:** Wildlife numbers, composition, and distribution are the responsibility of the individual States, are as the number of hunting permits issued. The Forest participates in the public input opportunities offered by the States in making recommendations that will help prevent adverse effects on the habitat that is within the National Forest System.

Predators

**381. The Wasatch-Cache National Forest should address predator management.**

**381.1 By implementing predator management practices to meet population objectives**

**381.2 By maintaining authority over predator control**

**Response:** Wildlife population objectives are set by the States. By law (The Animal Damage and Control Act of 1931, as amended), predator management is under the authority of APHIS-Wildlife Services (WS). Funding for the program comes from the Federal Government, the State, and the permittees. The Forest is involved with input into WS NEPA process and having annual operating plan meetings with WS.

**382. The Wasatch-Cache National Forest should not reintroduce predators, because they are not compatible with humans.**

**Response:** There have been no official proposals to reintroduce any predators on the Wasatch-Cache National Forest. The policy on reintroductions is contained in Forest Service Manual 2640.

**383. The Wasatch-Cache National Forest should permit the passage of wolves to the Uinta Mountains.**

**Response:** If wolves return to Utah they will be under the control of the U.S. Fish and Wildlife Service (FWS) and managed as a threatened species. All activities concerning the wolf would be done through the consultation process with the FWS as outlined in the Endangered Species Act, Section 7.

**384. The Wasatch-Cache National Forest should prevent the treeing of cougars with motorized vehicles.**

**Response:** The hunting and pursuing of cougars is set and controlled by State law.

**385. The Wasatch-Cache National Forest should protect the lynx.**

**385.1 By protecting lynx habitat**

**Response:** The Forest has identified “linkage habitat” and “core habitat” in consultation with the FWS and Utah Division of wildlife resources. Lynx Analysis Units have been identified in the core habitat as outlined in the “Canada Lynx Conservation Assessment and Strategy” and appropriate standards and guidelines are contained in the Revised Forest Plan.

**385.2 By recognizing the wide variety of factors influencing the status of the lynx**

**Response:** These factors have been considered and worked with in mapping of core habitat and linkage habitat. Standards and guidelines have been developed to work within these habitats as well as working with the U.S. Fish and Wildlife Service through the consultation process on all proposed projects.

**385.3 By developing goals and objectives or standards and guidelines specifically designed to mitigate impacts on the lynx**

**Response:** This has been done in the revised Forest Plan.

**386. The Wasatch-Cache National Forest should recognize that the need for a lynx corridor has not been established.**

**Response:** The concept of wildlife corridors is well established and the importance of the Bear River Range (specifically addressed in this comment) is well shown by referring to McNabb’s “Ecological Subregions of the United States: Section Descriptions.” This corridor applies not only to lynx but to all mammals that have large movement areas and neo tropical avian migrants that depend on forested conditions.

- 387. The Wasatch-Cache National Forest should reevaluate any management prescription, management designation, or alternative selection made based on the Canadian lynx.**

**Response:** The lynx was listed as a threatened species by the FWS over its historical range, which included Utah, and until the FWS changes that we work with them in meeting the intent of the law.

- 388. The Wasatch-Cache National Forest should recognize that studies on lynx management are inconclusive.**

**Response:** See response to # 387 above.

- 389. The Wasatch-Cache National Forest should recognize that the lynx can survive along with multiple use activities.**

**Response:** This is recognized and that is why the Revised Plan emphasizes properly functioning condition, historic range of variation, and ecological sustainability. However, when a species is federally listed under the Endangered Species Act we are put into a single species management situation that dictates some management emphasis outside of the multiple use arenas. Standards and guidelines that are specifically for lynx or other single species in most cases act as mitigation measures that make it possible for other multiple use activities to continue. All proposed projects on the Forest require some level of consultation with the FWS when federally listed species have been identified by the FWS as being present or having habitat on the Forest.

- 390. The Wasatch-Cache National Forest should remove the phrase “to the extent possible” regarding lynx management from the Draft EIS.**

**Response:** This has been done.

- 391. The Wasatch-Cache National Forest should not close access to land because of possible lynx habitat.**

**Response:** This has not been proposed.

#### Other Wildlife Species

- 392. The Wasatch-Cache National Forest should monitor beaver and snowshoe hares.**

**Response:** Both beaver and snowshoe hare have been identified as management indicator species.

- 393. The Wasatch-Cache National Forest should reintroduce beaver.**

**Response:** Where this is not a Forest Plan decision, the Forest has and will continue to discuss the reintroduction of beaver, in appropriate locations, with the Utah Division of Wildlife Resources.

**394. The Wasatch-Cache National Forest should protect bats.**

**Response:** Two bats, the spotted and Townsend's big-eared are Regional Forester designated sensitive species and are considered in biological evaluations required on all proposed projects. Others bats are considered when proposed projects may affect their habitat.

**Fish**

**395. The Wasatch-Cache National Forest should protect native cutthroat trout by restoring and expanding its habitat.**

**Response:** We recognize the role the Forest has in providing habitat for sensitive species and appreciate your support. Goals, subgoals, standards, guidelines and the identification of management prescription 3.1a provide for the protection of cutthroat trout habitat on the forest. In regards to the seven populations that may become extirpated with in next 15 years (FEIS, Table AQ-2) additional information has been provided.

Some actions are outside the jurisdiction of the Forest Service. Fish stocking and setting harvest limits are under the direction of the Utah Division of Wildlife Resources or the Wyoming Game and Fish Department, for Utah and Wyoming respectively.

**396. The Wasatch-Cache National Forest should address the impacts of non-native fish species on native cutthroat trout**

**Response:** See response for comment 395. The Forest is active in participating in the cutthroat trout conservation agreements and strategies identified in Appendix B of the FEIS. Coordination with the states are an important part of any conservation work.

**397. The Wasatch-Cache National Forest should include the monitoring of trout habitat along with monitoring of condition indices to understand the ability of a given stream to support larger trout populations.**

**Response:** We agree that habitat conditions are important to monitor. Habitat parameters are collected during fish sampling efforts. Habitat surveys will also continue to be conducted although; they are not identified in Chapter 5 of the Forest Plan. Chapter 5 of the plan identifies that surveys will be conducted in at least one subbasin (4<sup>th</sup> level HUC) per year.

**398 The Forest Plan should de-emphasize non-native fish species**

**Response:** It's important to understand that Native species are all species of plants and animals naturally occurring, either presently or historically, in any ecosystem of the United States. This is defined in the glossary and is taken from Executive Order 11987, 42 FR 26949, 1977 WL 23618 as directed by the President of the United States, May 24, 1977.

It is Forest Service Policy (FSM 2640.3) to:

2640.3 - Policy. It is Forest Service policy to:

1. Provide habitat for stocked species and assist in stocking and introduction operations to restore locally extinct indigenous species, to recover threatened and endangered species, and to introduce new species in coordination with State and Federal agencies.
2. Provide a variety of fishing, hunting, trapping, viewing, studying, and photographing opportunities and experiences in cooperation with the State fish and wildlife agencies.
3. Emphasize the protection, enhancement, and maintenance of habitats for production of wildlife and fish. Introductions or stocking of species may be made to restore resources following environmental changes, to provide recreation opportunities where reproduction is insufficient to meet demand, or to introduce new species desired by the public.
4. Favor native or desirable non-native species over new exotic species in stocking and introductions.

**399 The Wasatch-Cache National Forest should define “undesirable fish.”**

**Response:** Undesirable fish are those where a joint agreement, between the State fish and wildlife agency and the Forest Service, cannot be reached when proposal to introduce a species has been made. Undesirable fish may also include species found on the Forest where joint agreement has been reached, between the State fish and Wildlife agency and the Forest Service, and the determination made that the species is undesirable.

2640.41 - Regional Forester. The Regional Forester shall:

1. Reach joint agreement with the appropriate State fish and wildlife agencies on proposals for introductions of the following fish and wildlife on National Forest System lands:
  - a. Exotic and non indigenous fish and wildlife to a National Forest where they do not presently occur.
  - b. Federally listed endangered and threatened species.
2. Coordinate exotic and Federally listed species introduction proposals with the Fish and Wildlife Service.



3. Coordinate recommendations on hunting, fishing, or trapping regulations to State and Federal fish and wildlife agencies in States with more than one Supervisor's Office.

2642 - INTRODUCTION OF INDIGENOUS AND NONINDIGENOUS WILDLIFE AND FISH. Occasionally, areas and conditions are found that would best suit fish or wildlife that are not indigenous to a forest. Introductions of wild turkeys in certain western forests are an example. Once introduced, further introductions are considered stocking and an environmental analysis is not required unless the action is determined to be controversial.

**400 The Wasatch-Cache National Forest should clarify Table AQ-1 to state that it refers to historic rather than current presence of fish species.**

**Response:** Thank you for your comment. This table has been corrected.

#### Amphibians

**401 The Wasatch-Cache National Forest should clarify its management plan for amphibians**

**Response:** Invertebrate Species Considered section of the FEIS appendix B gives the direction for invertebrate species where little information is known. The Provo River, below Soapstone Creek, was identified as Management Prescription 3.1A to provide protection for known spotted frog populations on Forest. Beaver Creek is also designated as 3.1a to provide for aquatic species, which would include historic habitat for spotted frogs.

No known monitoring is occurring in the Red Butte Research Natural Area for boreal toads. It is believed that if the boreal toad persists in the drainage the population is secure given the direction of management in RNAs.

Management and reintroduction of species will be done in accordance with Forest Service Direction identified in response 399.

**402 The Wasatch-Cache National Forest should place amphibians on the priority list by adequately monitoring amphibians.**

**Response:** See response to 401 and 402. The forest is working with the State fish and wildlife agencies to better understand current distribution of amphibians on the forest and provide for their conservation.

**403. The Wasatch-Cache National Forest should recognize that the spotted frog is a historically occurring species**

**Response:** Thank you for your comment.

## Birds and Raptors

**404. The Wasatch-Cache National Forest should incorporate the U.S.Fish and Wildlife Service's raptor guidelines into all management activities.**

**Response:** Although not specifically referred to in the Plan or FEIS the forest uses these guidelines whenever it is appropriate in project planning.

**405. The Wasatch-Cache National Forest should protect critical habitat for sensitive raptor species.**

**Response:** Habitat for Regional Forester designated sensitive species is addressed and mitigation proposed in Biological Evaluations for site-specific projects. When other raptor species are identified within a proposed project area their presence, habitat needs, and mitigation measures to protect them are covered in the NEPA document.

**406. The Wasatch-Cache National Forest should adequately address goshawk management.**

**406.1 By following recommendations in Conservation Strategy and Agreement for the Management of Northern Goshawk Habitat in Utah (HCS).**

**Response:** In March 2000 the 1984 Forest Plan was amended to incorporate recommendations from the HCS. This has carried into the new plan and is covered by several standards and guidelines.

**406.2 By addressing livestock impacts to its habitat and prey base**

**Response:** Livestock impacts are addressed in individual allotment management plans and covered in the standards and guidelines.

## Management Indicator Species

**407. The Wasatch-Cache National Forest should not dismiss a species from consideration as a management indicator species because it is difficult to monitor.**

**Response:** One of the criteria used in selecting MIS was, "The MI is relatively easy to monitor, i.e. highly visible and in adequate numbers." To fulfill the purpose of MIS there is no need to choose species that are difficult to monitor. The process and MIS should be those that meet the requirement and intent of the regulations. MIS are discussed in Appendix J.

**408. The Wasatch-Cache National Forest should improve its management of management indicator species.**

**408.1 By prescribing goals, objectives, standards, guidelines, and mitigation measures for all management indicator species.**

**Response:** The purpose of MIS is not to manage the species but to monitor it to help determine the effects of projects on a broader group of species. MIS are protected under regulations on diversity and viability.

**408.2 By developing an adequate monitoring program for management indicator species.**

**Response:** Monitoring of MIS is covered in Chapter 5 of the Forest Plan and Appendix J of the FEIS.

**408.3 By adequately monitoring macro-invertebrates as management indicator species.**

**Response:** The Forest is not using macro-invertebrates as MIS in the new plan. Cost of analyzing samples was one of the main factors that could preclude doing the monitoring. Using the coefficient of condition for cutthroat trout will provide needed information on the aquatic health of the system (See the discussion in Appendix J of the FEIS).

**408.4 By monitoring management indicator species no more than once a year.**

**Response:** Appropriate monitoring techniques and time intervals are identified in Chapter 5 of the Forest Plan and in Appendix J of the FEIS.

**408.5 By identifying habitat that is capable of supporting management indicator species.**

**Response:** This is done in Appendix J of the FEIS.

**408.6 By adequately analyzing the relationships between management indicator species, habitat, and other species.**

**Response:** The reasons for picking particular MIS and available habitats for them are found in Appendix J. CFR 219.19(6) indicates that analyzing the relationships between MIS and habitat changes is part of the monitoring report.

**408.7 By identifying management indicator species for aquatic ecosystems and for botanical resources.**

**Response:** The Forest is following Regional direction is the selection of MIS.

**408.8 By selecting additional terrestrial animals as management indicator species.**

**Response:** The Forest picked species and the number of species needed to monitor the terrestrial and aquatic resources identified.

**409. The Forest Plan should provide a detailed discussion of targeted management indicator species.**

**Response:** MIS are discussed in detail in Appendix J of the FEIS.

**410. The Wasatch-Cache National Forest should include predators as management indicator species, such as the wolverine and the mountain lion.**

**Response:** See discussion on selecting MIS in Appendix J of the FEIS.

**411. The Wasatch-Cache National Forest should rely more heavily on birds as management indicator species.**

**Response:** See Appendix J or the FEIS for the discussion of the selection of MIS.

**412. The Wasatch-Cache National Forest should include neo-tropical migratory birds within the MIS/SAR category.**

**Response:** Neo-tropical migratory birds do not fit the selection criteria for MIS because they do not remain in the area year round and changes in population trends may be caused by factors outside of the control of the Forest. The subjects of MIS and SAR are distinctly different and have been split into two separate areas in the final EIS. SAR are discussed in Appendix B and MIS in Appendix J. SAR do include neo-tropical migrants where appropriate.

**413. The Wasatch-Cache National Forest should designate the sage grouse as a management indicator species instead of the vesper sparrow.**

**Response:** Sage grouse were considered but are not evenly distributed across the sage steppe habitat type on the Forest to be an effective MIS. The vesper sparrow has also been dropped. See discussion in 412 above.

**Threatened, Endangered, and Sensitive Species**

Threatened, Endangered, and Sensitive Species General

**414. The Wasatch-Cache National Forest should revise the definition of sensitive species**

**Response:** The Regional Forester is responsible for identifying which species will be identified as sensitive as directed by Forest Service Manual 2670.

2672.11 - Identification of Sensitive Species. Regional Foresters shall identify sensitive species occurring within the Region. They shall examine the following sources as possible candidates for listing as sensitive species:

1. Fish and Wildlife Service or National Marine Fisheries Service candidates for Federal listing (categories 1 and 2) under Federal Register Notice of Review.
2. State lists of endangered, threatened, rare, endemic, unique, or vanishing species, especially those listed as threatened under State law.
3. Other sources as appropriate in order to focus conservation management strategies and to avert the need for Federal or State listing as a result of National Forest management activities.

The changing of the definition and/or the addition or removal of species to or from this list is outside the scope of this analysis and decision.

- 415. The Wasatch-Cache National Forest should provide a full range of standards and procedures for the selection of sensitive species.**

**Response:** See response to comment 414.

- 416. The Wasatch-Cache National Forest should manage all threatened, endangered, and sensitive species in the context of the overall, functional ecosystem**

**Response:** Thank you for your comment. The plan tries to address biodiversity. See issue 3 in the Plan.

- 417. The final Forest Plan should include actions to restore habitat for threatened and endangered species such as the Lynx.**

**Response:** In the eleven counties in Utah that the U.S. Fish and Wildlife Service (FWS) has identified as lynx counties the Forest has consulted with the FWS on ongoing activities. In the Forest Plan Revision, standards and guidelines have been incorporated to deal with Federally listed species including the lynx. The Plan also emphasizes management that moves the forest toward properly functioning condition and the historic range of variability which is the habitats and age classes that the lynx existed in over time.

- 418. The Wasatch-Cache National Forest should improve monitoring of threatened, endangered, and sensitive species**

**418.1 By increasing the plan objectives for non-project related monitoring of threatened and endangered species**

**Response:** See the monitoring section in the Forest Plan. These species will be monitored as projects that could potentially impact them are planned and implemented.

**418.2 By including clear monitoring requirement for threatened, endangered, and sensitive raptors**

**Response:** See the monitoring section in the Forest Plan. These species will be monitored as projects that could potentially impact them are planned and implemented. The Forest will continue to work with the U.S. Fish and Wildlife Service and the States in these efforts.

**418.3 By monitoring threatened, endangered, and sensitive plants**

**Response:** See the monitoring section in the Forest Plan. *In addition to broad-scale inventory and monitoring of TES plants*, these species will *also* be monitored as projects that could potentially impact them are planned and implemented.

- 419. The Wasatch-Cache National Forest should include specific and individual conservation and recovery plans for all threatened and endangered species including the western boreal toad.**

**Response:** The development of conservation and recovery plans is outside the scope of this analysis and decision. A number of the species are currently covered

by conservation agreements and strategies (see Conservation approaches for species-at-risk to maintain existing populations in Appendix B of the FEIS).

See also response to comment 402.

**420. The Wasatch-Cache National Forest should include specific and individual conservation and recovery plans for all threatened and endangered species**

**Response:** Individual species were reviewed along with potential threats. Standard and guidelines were then reviewed and/or developed to reduce the threats to the species at risk. Site-specific analysis and the development of implementation actions will be required to further reduce the potential threats to T, E, and S species. These site-specific analyses are beyond the scope of this analysis and decision.

Adequacy of Analysis

**421. The Wasatch-Cache National Forest should conduct surveys for sensitive species before allowing certain activities**

**Response:** As part of the site-specific planning process, Threatened, Endangered and Forest Service Sensitive species are reviewed and an analysis conducted to determine potential impacts. This information is maintained in a Biological Assessment and Biological Evaluation.

**422. The Wasatch-Cache National Forest should recognize that the reconstruction of the Red Butte Reservoir dam and its subsequent maintenance plans to provide a refuge for the June sucker are premature**

**Response:** This desired future is recognizing Public Law 106-65 dated October 5, 1999. This law directs the Secretary of the Army to convey Red Butte Dam, Reservoir and other improvements to the Central Utah Water Conservancy District.

**423. The Wasatch-Cache National Forest should add Botrychium linear to Table B-4-1**

**Response:** This plant has been added to Table B-4-1 and additional information on this species is in Chapter 3, Topic 2, Biodiversity and Viability, Botanical Resources, FEIS Appendix F, and in the Forest Plan, Chapter 4C under the Central Wasatch Management Area.

**424. The Forest Plan should include a discussion of threatened and endangered species in the Environmental Consequences section**

**Response:** This has been done. Thank you for your comment.

**425. The Wasatch-Cache National Forest should add a sentence to the Endangered Species Act description stating that each federal agency will ensure that their actions are not likely to jeopardize threatened and endangered species**

**Response:** This is covered under manual direction: Forest Service Manual 2670.11 - Endangered Species Act. Section 2 of the Endangered Species Act of 1973, as amended 1978, 1979, 1982 and 1988 (16

U.S.C. 1531 et seq.; hereinafter referred to as the act) declares that ". . . all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act."

## Vegetation

### Vegetation General

**426. The Wasatch-Cache National Forest should clarify vegetation management.**

**Response:** The forest will be managed for a range of conditions that occurred historically, and not for any static state. Should climates change dramatically, the conditions the forest would be managed for would evolve accordingly. We have not seen, however, these kinds of dramatic changes within a planning period (10-15 years).

**427. The Wasatch-Cache National Forest should clarify its finding of greater vegetative diversity in the Wasatch Mountains.**

**Response:** No greater inventories have been conducted in the Wasatch Mountains than on any other portion of the Forest. In fact, other portions of the Forest have been inventoried to a much greater extent because of the timber and livestock production that occurs there. The greater diversity has been recognized through general observations and recent vegetation mapping which shows that this area includes a large variety of vegetation types because of the geological differences, which result in different soil characteristics, as well as the annual precipitation.

**428. The Wasatch-Cache National Forest should provide a mix of vegetative age classes to maintain biodiversity.**

**Response:** Guideline G14 and the associated table describe the desired mix of age classes for dominant cover types of the Forest. Alternative 7 is focused on moving the vegetation cover types toward properly functioning condition. Table VEG-3 in FEIS Chapter 2, Topic 2 – Biodiversity and Viability, Vegetation shows that Alternative 7 treats (harvest, prescribed fire, and mechanical treatments) an average of nearly 9,000 acres per year to move toward properly functioning conditions. This will help maintain biodiversity.

**429. The Wasatch-Cache National Forest should maintain more old growth forest to protect threatened and endangered species.**

**Response:** The direction outlined in the Forest Plan under Guideline G14, illustrates a variety in age classes by cover type; these range from about 20 percent in forested communities, to 20-40 percent in oak and mahogany communities. Forest wide Standard S13 has been modified to reflect this change in the minimum amount of old growth. It states that at least 20 percent of each forested cover type within each ecological section of the Forest "shall be maintained with old forest landscape structure".

**430. The Wasatch-Cache National Forest should ensure adequate amounts of snags and downed wood.**

**Response:** Guideline 16 and the associated table describe the amount of snags and coarse woody debris that is desired following timber harvest activities. Additional management direction for snags and coarse woody debris can be found in Forest Service Manual 5150 and FSM 2550.

**431. The Wasatch-Cache National Forest should use the wetlands Standard as a starting point for the development of an alpine vegetation standard.**

**Response:** A modification has been made to Guideline 9 that includes avoiding soil-disturbing activities in alpine areas as well as on steep, erosive, and unstable slopes, and in riparian, wetlands, floodplains, and wet meadows.

**432. The Wasatch-Cache National Forest should act to reverse aspen decline.**

**Response:** The decision alternative focuses on such a reverse by treating approximately 3,700 acres of aspen, conifer, and conifer with aspen each year. Many conifer treatments would be focused in areas that historically had aspen and that still have the ability to be dominated by aspen following treatment. At this rate, aspen would return to its properly functioning condition within 8 decades.

**433. The Wasatch-Cache National Forest should classify the treatment in conifer and aspen stands for increased water output as a vegetative treatment.**

**Response:** One benefit of replacing conifers with aspen, as a part of treatments to increase age class diversity in aspen communities (See response 432), is that water yield may also increase. The extent of this increase is not easily identified, but some research has shown this to occur.

Increased water yield is considered a secondary benefit for primary treatment needs such as vegetative treatments to restore properly functioning condition and timber harvest for commercial purposes. The FEIS section on Effects on Soil and Water Resources from Timber Harvest/ Vegetation Treatment under Topic 1, Watershed Health states that the realities of generating significant water yield are limited because of land ownership, land allocation, vegetation type, variable elevations and aspects, and multiple resource needs. This is why the Forest Plan FEIS does not propose increasing water yield as primary output.

**434. The Wasatch-Cache National Forest should maintain sagebrush communities.**

**Response:** As noted in the FEIS, (Chapter 3, Topic 10 – Fire Management), sagebrush communities are currently classified as being in either Fire Condition Class 2 (Moderate alterations to the historic disturbance are clearly evident, such as one or more missed fire return intervals) and Condition Class 3 (The disturbance regime has been significantly altered) with a fire return interval of 0-35 years. Given that fires played an important historical role in the ecology of these sagebrush communities on the Forest, we propose to treat approximately 3,000 acres a year of sagebrush and pinyon-juniper that occurs on lands historically dominated by sagebrush to begin to return these communities to properly functioning conditions. As a result some of these areas will produce forage for



livestock, but all acres will provide for a greater variety of wildlife habitat as well as maintaining or improving watershed conditions.

**435. The Wasatch-Cache National Forest should protect the habitat for five unique species of wildflowers.**

**Response:** Guideline G23 has been modified and provides for protection for populations of rare plant species across the forest.

**436. The Wasatch-Cache National Forest should revegetate with seed from native plants.**

**Response:** The Forest Plan provides Guideline G22, which directs the use of native seed in revegetation efforts.

**437. The Wasatch-Cache National Forest should preserve nonvascular plant species.**

**Response:** We noted the value of non-vascular plants in FEIS, Chapter 3, Topic 2 – Biodiversity and Viability, Botanical Resources. Additional information has been added on the distribution and value of cryptogamic crusts to this chapter. Difficulty of identification of many of these non-vascular plants makes the development of species-specific management more difficult.

Adequacy of Analysis

**438. The Wasatch-Cache National Forest should investigate the causes of tree mortality and mortality in old growth trees.**

**Response:** The dominant cause of tree mortality is an overall aging of exiting forest communities as a result of successful fire exclusion. Because of this, age classes are skewed toward the older age classes, which means many more acres of trees susceptible to disease. There is a lack of diversity in age classes across the landscape, a build up of associate fuels, and increased disease, which have increased the acres in fire condition class 3 as described in FEIS, Chapter 3, Topic 10 – Fire Management.

Noxious Weeds

**439. The Wasatch-Cache National Forest should adequately address noxious weed management.**

**439.1 By fairly evaluating the spread of noxious weeds**

**439.2 By developing a guideline which prohibits certain activities in areas where noxious weeds occur**

**Response:** We have added information on the location of noxious weeds in FEIS Appendix H. A guideline (G25) for the management of noxious weeds has been added and Forest Plan Appendix III has been updated.

- 440. The final Forest Plan should include a clear definition and list of noxious weeds to prevent removal of desirable species.**

**Response:** A list of Utah and Wyoming Noxious Weeds found in the different ecological sections of the Wasatch-Cache National Forest has been added to FEIS, Appendix H. A definition of noxious weed has been added to the Forest Plan and FEIS Glossaries.

- 441. The Wasatch-Cache National Forest should disclose the locations that are currently affected by noxious weeds.**

**Response:** See response to 439.

- 442. The Forest Plan should include all Standards and Guidelines applied by vegetative community.**

**Response:** The standards and guidelines in Appendix B2 were incorrectly displayed and have been removed from that Appendix and have been replaced with those in the Forest Plan.

#### Effects of Activities/Disturbance

- 443. The Wasatch-Cache National Forest should fence off representative vegetation areas from human and livestock use to study the effects of use.**

**Response:** Exclosures have been used in the past to study areas with relatively little disturbances. While some of these exclosures have been maintained and some new exclosures established within the past 10 years, others have fallen into disrepair. Those exclosures that have not fallen into disrepair will likely continue to be maintained. In addition, proposed and existing Research Natural Areas are available for such studies and additional exclosures may be established on a site-specific scale to study the effects of various uses and management actions on different vegetation types.

- 444. The Wasatch-Cache National Forest should not spray herbicides or synthetic chemicals.**

**Response:** This plan does not address the treatment methods allowed for noxious weeds and these will be addressed through future analysis. While we feel that, while the use of herbicides should be limited, the ecological impacts of the spread of noxious weeds may outweigh the ability to control them with other methods alone.

- 445. The Wasatch-Cache National Forest should not apply snow-stabilizing chemicals such as ammonium over ski runs in alpine habitats because the chemicals may lead to noxious plant invasion.**

**Response:** The use of snow stabilizing chemicals on ski runs in alpine habitats has not resulted in noxious weed invasions on the Forest and such invasions are not anticipated. We will continue to monitor these areas for such invasions.

**446. The Wasatch-Cache National Forest should prohibit plant collection.**

**Response:** Plant collection for sustainable cultural uses is described in a Forest-wide subgoal in the Forest Plan. Other direction for the collection of plants is also described in Guidelines 31 and 32 in the Forest Plan. These collections will ultimately benefit the management and knowledge of plant species on the Forest.

**447. The Wasatch-Cache National Forest should adequately address plant collection in the Forest Plan.**

**Response:** See Response to 446.

### **Topic 3: Road and Access Management**

#### **Infrastructure General**

##### **Adequacy of Analysis**

**448. The Wasatch-Cache National Forest should use 2001 as a benchmark for peak traffic congestion targets in the Tri-Canyon area Because 2000 was a weak ski season.**

**Response:** Thank you for your comment. The wording has been adjusted to set parking at 2000 levels not refer to congestion levels.

#### **Trailhead Access and Parking**

**449. The Wasatch-Cache National Forest should actively encourage mass transit as proposed in the Draft EIS.**

**Response:** Thanks for your comment. See the desired future condition for the Central Wasatch Management Area Roads/Trails/Access.

**449.1 By limiting the number of cars**

**Response:** See the desired future condition for the Central Wasatch Management Area Roads/Trails/Access. We are setting parking space limits.

**449.2 By providing shuttle bus services**

**Response:** See the desired future condition for the Central Wasatch Management Area Roads/Trails/Access. We are setting parking space limits.

**450 The Wasatch-Cache National Forest should work actively with other agencies and parties to develop a comprehensive transportation system for the Tri-Canyon area and by developing a ride and ski pass.**

**Response:** See the desired future condition for the Central Wasatch Management Area Roads/Trails/Access.

**451. The Wasatch-Cache National Forest should work with the Utah Department of Transportation and Snowbird to add a bus pull-out lane and bus stops at the White Pine Canyon trailhead.**

**Response:** See the desired future condition for the Central Wasatch Management Area Roads/Trails/Access. See response 496.

**452. The Wasatch-Cache National Forest should adopt the proposed parking capacity limit to encourage mass transit.**

**Response:** Thank you for your comment.

**453. The Wasatch-Cache National Forest should change the parking lot guideline to a standard and reword it.**

**Response:** Thanks for your comment. This has been changed.

**454. The Wasatch-Cache National Forest should provide more parking.**

**Response:** We believe we are at a maximum parking capacity for the Tri-canyon area. Other modes of transportation can still be explored.

**454.1 By permitting additional resort parking**

**Response:** See the desired future condition for the Central Wasatch Management Area Roads/Trails/Access.

**454.2 By providing additional parking areas only at the mouths of canyons**

**Response:** See “Outside Framework Level of Analysis” as identified in the FEIS. This is outside the scope of this analysis.

**454.3 By adding more winter trailhead parking**

**Response:** This can best be dealt with during travel management planning. Travel management planning is part of the objectives of the Forest Plan. See “Outside Framework Level of Analysis” as identified in the FEIS.

**455. The Wasatch-Cache National Forest should state in the Forest Plan that it will not impose greater parking regulations than those already imposed in Snowbird’s Master Development Plan Record of Decision.**

**Response:** We believe that we need to maintain flexibility to take appropriate action to protect or improve water quality and watershed condition, as more information become available.

**456. The Wasatch-Cache National Forest should develop separate parking areas for snowmobilers and skiers In Franklin Basin.**

**Response:** See response 454.3 The citation listed for Franklin Basin (Draft Plan 4-73) is the desired future. It is the Forest’s desired future that in the Franklin Basin that parking for both motorized and non-motorized winter dispersed recreation use is provided and that conflicts between these uses have been minimized through some separation of used, clearly marked areas, user cooperation and additional law enforcement. Again this is the desired future and does not currently exist.

## Trailhead Facilities and Signs

**457. The Wasatch-Cache National Forest should reconsider placement of High Uintas Wilderness trailheads.**

**Response:** See response 454.3

**458. The Wasatch-Cache National Forest should provide garbage cans at trailheads.**

**Response:** This is outside the scope of the Revised Forest Plan, but will forward the information to the responsible managers for their consideration.

**459. The Wasatch-Cache National Forest should provide rest room facilities at trailheads for year-round recreationists.**

**Response:** See response to concern statement 458.

**460. The Wasatch-Cache National Forest should focus accessibility efforts on developed recreation facilities, rather than providing more motorized opportunities.**

**Response:** We are trying to make our developed recreational facilities more handicap accessible as these facilities are upgraded. This is also the direction for the Forest wide goal under recreation

**461. The Wasatch-Cache National Forest should improve signage**

**461.1 By replacing existing trail markers with more visible ones**

**Response:** The Forest is following the existing National direction in this area as identified in "Sign and Poster Guidelines for the Forest Service, Engineering Staff, Washington, DC 1998. Publication EM-7100-15". Trail and road signing; closing, leaving open or adjusting road objectives and parking are developed during travel management planning. Travel planning is one of the objectives to be dealt with during this next planning period. See also "Outside Framework Level of Analysis" as identified in the FEIS.

**461.2 By adding more wilderness trail signs**

**Response:** See response to 461.1.

**461.3 By adding signs at lakes that list restrictions**

**Response:** See response to 461.1.

**461.4 By changing informational signs at trailheads so as not to imply that motorized users cause greater damage**

**Response:** See response to 461.1.

**461.5 By creating a standard signing convention for travel restrictions to reduce confusion.**

**Response:** See response 461.1.

**461.6 By making signs larger and using more colors**

**Response:** See response 461.1.

- 462. The final Forest Plan should specify use of ACQ lumber in on-forest construction projects instead of copper-chromium-arsenate-treated lumber due to toxicity concerns.**

**Response:** See response 461.1.

#### Trailhead – Site-Specific

- 463. The Wasatch-Cache National Forest should add more parking lots at specific trailheads in the Beaver and Sinks areas**

**Response:** See response 461.1.

- 464. The Wasatch-Cache National Forest should develop a trailhead at Norway Flats.**

**Response:** See response 461.1.

- 465. The Wasatch-Cache National Forest should add a sign for the Mineral Fork Trailhead**

**Response:** See response 461.1.

#### Road System Management

##### Adequacy of Analysis

- 466. The Final EIS should include an expanded discussion of road impact mitigation.**

**Response:** See response 461.1. Additional information is also provided in the roads analysis found in the FEIS Appendix B-5.

- 467. The final Forest Plan should specify how maintenance workers will apply the Watershed Conservation Practices.**

**Response:** See response 461.1. Additional information is also provided in the roads analysis found in the FEIS Appendix B-5. The training of personnel is outside the scope of this analysis.

- 468. The Final EIS should include a comparison of the effects of single-track motorized trails and roads.**

**Response:** Many of the effects from access and travel management, be it from roads or trails, are similar. Some of the analysis however did recognize the difference in affects as identified in the Aquatic Diversity and Viability section of Appendix B in the FEIS. Appendix II in the Forest Plan identifies mitigation efforts to reduce sediment runoff from roads and trails.

Legal Considerations

- 469. The Final EIS should evaluate direct and cumulative impacts of road closures on Revised Statute 2477 routes**

**Response:** See the FEIS under RS2477 road assertions of counties in the Outside of Forest Service Authority section.

- 470. The Wasatch-Cache National Forest should recognize Revised Statute 2477 road rights-of-way claimed by local governments for all routes in existence prior to 1976.**

**Response:** See response 469.

- 471. The Wasatch-Cache National Forest should recognize that, by definition, Revised Statute 2477 road rights-of-way invalidate roadless areas.**

**Response:** See response 469.

Road Construction and Reconstruction General

- 472. The Wasatch-Cache National Forest should not expand the road and off-road vehicle trail network.**

**Response:** See response to 461.1.

- 473. The Wasatch-Cache National Forest should build roads to the center of wilderness areas.**

**Response:** See response to 461.1.

- 474. The final Forest Plan should allow temporary road construction and potentially design them for later recreational use.**

**Response:** Temporary roads are permitted under the Forest Plan. See also response to 461.1.

- 475. The Wasatch-Cache National Forest should reconstruct road and trail segments that are causing environmental impacts rather than close them.**

**Response:** See response 461.1.

- 476. The final Forest Plan should prohibit roads across amphibian travel routes and prohibit new construction.**

**Response:** See response to 461.1.

- 477. The Wasatch-Cache National Forest should avoid constructing roads in tundra and talus ecosystems due to the environmental sensitivity of these areas.**

**Response:** Guidelines 7 and 9 addresses this.

- 478. The Wasatch-Cache National Forest should delete the first two sentences in the second paragraph on page 4-89 of the proposed plan because motorized route construction requires separate National Environmental Policy Act analysis.**

**Response:** This is the desired future for the North Wasatch, Ogden Valley Management Area. It is believed that the analysis of the roads in the Public Grove area is important to define the future uses in the area.

#### Road Construction and Reconstruction in Roadless Areas

**479. The Wasatch-Cache National Forest should allow road realignment and reconstruction in roadless areas**

**Response:** See Allowed Activities Explanation. “Where Road construction is not allowed by Management Prescription the responsible official may authorize road construction or reconstruction when: . . . d. Realignment is needed to prevent irreparable resource damage by a classified road.”

**480. The Wasatch-Cache National Forest should allow temporary road construction in roadless areas and design them for later recreational use.**

**Response:** See the roadless area evaluation in Appendix C. of the FEIS and response 461.1.

**481. The final Forest Plan should redefine road construction so that trail construction in inventoried roadless areas is clearly allowed**

**Response:** This is now clearly identified in Chapter 2 of the FEIS.

**482.1 The Wasatch-Cache National Forest should prohibit road construction in roadless areas.**

**Response:** This is within the range of alternatives as identified in the FEIS.

**482.2 Mount Naomi area**

**Response:** This is within the range of alternatives as identified in the FEIS.

**482.3 South of the North Slope Road**

**Response:** This is within the range of alternatives as identified in the FEIS.

#### Road Construction and Reconstruction – Site-Specific

**483. The Wasatch-Cache National Forest should build a loop trail starting at state road sheds in Logan Canyon.**

**Response:** Trail and road signing; closing, leaving open or adjusting road objectives and parking are developed during travel management planning. Travel planning is one of the objectives to be dealt with during this next planning period. See also “Outside Framework Level of Analysis” as identified in the FEIS.

**484. The Wasatch-Cache National Forest should build an interlink trail for off-road vehicles parallel to Highway 152 in Big Cottonwood Canyon.**

**Response:** See response 483.



**485. The Wasatch-Cache National Forest should prohibit road construction in Public Grove**

**Response:** See response 483.

Road Maintenance

**486. The Wasatch-Cache National Forest should act to address its road maintenance backlog**

**Response:** See response 483.

**487. The Wasatch-Cache National Forest should be more efficient with road maintenance funds and personnel.**

**Response:** See response 483.

**488. The Wasatch-Cache National Forest should raise road maintenance and construction standards to lessen environmental impacts.**

**Response:** A number of the roads that are adjacent or that pass through the Forest are interstate, U.S. or State highways. Counties also own some of these roads. We can work cooperatively with the agencies that manage these roads and their right-of-ways but cannot control their activities. Such is the case with State Route 152 up Big Cottonwood Creek or US Highway 89 up Logan Canyon. Standards 2 and 19 provide direction to reduce or eliminate sediment from entering water bodies from Forest roads.

**489. The Wasatch-Cache National Forest should rewrite S-17 to apply to all roads and trails, not just decommissioned ones to ensure proper drainage.**

**Response:** Standards 2 and 19 address your concern.

**490. The Wasatch-Cache National Forest should remove all culverts and replace them with bridges across permanent streams.**

**Response:** It is unrealistic and we believe unnecessary to replace all culverts with bridges. We do identify that the broad Forest subgoal is to “Maintain and/or restore stream channel integrity, channel processes, and sediment regimes . . .”. We are also trying to meet the Forestwide Goal for Toad/Trail and Access Management. These goals, as defined in Forestwide Direction, are desired conditions to be achieved in the future. They are normally expressed in broad, general terms and are timeless. They may not be achieved on every site due to site-specific factors or existing condition.

**491. The Wasatch-Cache National Forest should increase bridge maintenance.**

**Response:** See response 488.

**492. The final Forest Plan should address minimizing the impacts of road maintenance near stream channels.**

**Response:** See response 488.

- 493. The Wasatch-Cache National Forest should implement designated access points to streams.**

**Response:** We appreciate your support in this area.

- 494. The Wasatch-Cache National Forest should not close roads currently being maintained by volunteers.**

**Response:** We believe that we need to maintain flexibility to take appropriate action to protect water quality and watershed health to meet the goals and desired future conditions as stated in the Forest Plan. This may require that roads currently being maintained through agreement with special user groups would need to be closed. Such closures would be identified through site-specific analysis during travel management planning. See also “Outside Framework Level of Analysis” in the FEIS.

#### Road Maintenance – Site-Specific

- 495. The Wasatch-Cache National Forest should increase road maintenance in roadless areas on the Logan Ranger District.**

**Response:** ATV vehicle registration fees are collected and distributed by the states. They are not generally transferred to the Forest to maintain Forest roads and trails for ATV use. Money used to maintain Forest roads and trails are allocated from the Federal and not state funds.

- 496. The Wasatch-Cache National Forest should grade Forest Road 041 or restrict it to off-road vehicles and motorcycles.**

**Response:** To address this individual concern through the Forest Plan is outside the scope of this analysis and is best dealt with through site-specific analysis during travel management planning as identified in the Forest Plan objectives. See also “Outside Framework Level of Analysis” in the FEIS and the roads analysis in the planning documents.

- 497. The Wasatch-Cache National Forest should plow the Tony Grove Lake access road in the winter.**

**Response:** See response 496.

- 498. The Wasatch-Cache National Forest should not oil the Sinks Road.**

**Response:** See response 496.

#### Road Closure

- 499. The Wasatch-Cache National Forest should only use signs to close roads rather than gates or traps.**

**Response:** Roads are closed for a variety of reasons. Some are closed and retained in maintenance level 1 standard because administrative access is still required. Others are closed and rehabilitated because they are no longer deemed necessary. The local forests do not establish fines for closure violations. These are set at a National level.

**500. The Wasatch-Cache National Forest should not place tank traps where winter motorized users may get stuck in them.**

**Response:** See response 496.

**501. The Wasatch-Cache National Forest should close roads in environmentally sensitive areas.**

**Response:** See response 496.

**502. The Wasatch-Cache National Forest should close roads strategically in order to link roadless areas to increase connectivity.**

**Response:** See response 496.

#### Road Removal and Obliteration

**503. The Wasatch-Cache National Forest should reduce the miles of roads on the forest.**

**Response:** See response 496.

**504. The Wasatch-Cache National Forest should follow through with closure and reclamation of roads after timber projects are complete because cumulative environmental effects are occurring.**

**Response:** See response 496. The correction of newly created unauthorized roads is dealt with in Standard S3, which closes unclassified roads and trails.

**505. The Wasatch-Cache National Forest should continue converting roads to single-track trails, but do not restrict bicycling to those routes only.**

**Response:** See response to 496.

**506. The Wasatch-Cache National Forest should consider an alternative that converts the backlog of unmaintained roads to motorized trails. To provide challenging recreation opportunities at lower costs.**

**Response:** See response 496.

**507. The Wasatch-Cache National Forest should prioritize restoration efforts for environmentally damaging roads and ways.**

**Response:** See response 496.

**508. The Final EIS should accurately address the environmental consequences of obliterating roadways.**

**Response:** See response 496.

#### Road Removal and Obliteration – Site-Specific

**509. The Wasatch-Cache National Forest should decommission and restore roads and ways in the Bear Management Area.**

**Response:** See response 496.

## Ways and Unclassified Roads

**510. The Final EIS should clarify the origin of unclassified roads.**

**Response:** We agree that the best way to handle road closures is through site-specific analysis. See response 496.

**511. The Final EIS should disclose how many miles of ways will be obliterated by alternative.**

**Response:** Currently there is no set number of roads identified in the Forest Plan to be obliterated. This will be dealt with through Objective for OHV and non-motorized travel management planning when implemented. See also response 496.

**512. The final Forest Plan should include specific road density limits of no more than 1 mile per square mile to address ongoing habitat fragmentation.**

**Response:** Road density was a factor identified in the roads analysis in the FEIS. See response 496.

**513. The Wasatch-Cache National Forest should not allow unclassified roads to be added to the Wasatch-Cache National Forest system.**

**Response:** Standard 3 has been added to avoid the adding of unclassified roads and trails.

**514. The Wasatch-Cache National Forest should prioritize rehabilitation and closure of ways.**

**Response:** See response 513.

**515. The Wasatch-Cache National Forest should increase funding to continue to reclaim off-road vehicle-created roads.**

**Response:** Thank you for your comment. Funding for road decommissioning has been a Nation emphasis the past few years.

**516. The Wasatch-Cache National Forest should balance the obliteration of redundant ways with recreational opportunity values.**

**Response:** See response 496.

**517. The Final EIS should discuss the impacts and mitigation of the growing problem of braided trails.**

**Response:** See response 496.

## Scenic Byways

**518. The Wasatch-Cache National Forest should not upgrade the scenic byway between Red Bank and Beaver to accommodate higher speeds.**

**Response:** See response 488.

**519. The Wasatch-Cache National Forest should design the proposed Bear Lake overlook rest area to minimize impacts to campers at the Sunrise Campground.**

**Response:** To address this individual concern through the Forest Plan is outside the scope of this analysis and is best dealt with through site-specific. See also “Outside Framework Level of Analysis” in the FEIS.

## **Trail System Management**

### **Trail System Management General**

**520. The final Forest Plan should specifically address non-motorized trail system management and work in coordination with local user groups.**

**Response:** Public involvement continues to play an important part in planning efforts at the local and Forest levels. This is part of the National Environmental Policy Act. See Appendix A of the FEIS.

**521. The Wasatch-Cache National Forest should develop a comprehensive trails plan with local governments and user groups on the Logan Ranger District.**

**Response:** See response 496.

**522. The final Forest Plan should retain emphasis on trail system planning in the Tri-Canyon area to balance use with watershed protection.**

**Response:** See response 496.

**523. The Wasatch-Cache National Forest should remove the “mostly derived from existing routes” language from Roads/Trails/Access Desired Condition descriptions in the proposed Forest Plan.**

**Response:** We have improved the discussion about trails in the management prescription areas of the plan and FEIS. The management prescriptions in most cases allow for the construction of new trails. However in area of concern for wildlife (MPC 3.2) no net increase in trail density is desirable (G3.2D-3). See also response 496.

### **Trail Construction and Reconstruction General**

**524. The Wasatch-Cache National Forest should meet trail construction and reconstruction targets in the Forest Plan.**

**Response:** The ability of a forest to implement a forest plan is dependent on budgetary constraints. The Forest was very optimistic in the 1986 plan. We have tried to be more realistic in this plan.

**525. The Wasatch-Cache National Forest should provide sufficient summer motorized use zones to allow expanded trail systems.**

**Response:** With the clarification of allowing or not allowing trail construction identified in the FEIS, trail construction is allowed in Alternative 5 in all management

prescriptions with the exception of existing wilderness, research natural areas, and undeveloped areas. Alternative 1 provides the other perspective. We believe this provide a sufficient range of new trail development opportunities for the analysis.

- 526. The Wasatch-Cache National Forest should adopt the Recreation Opportunity Spectrum map in Alternative 7 submitted by the public.**

**Response:** See response 525.

- 527. The Wasatch-Cache National Forest should expand the motorized trail network.**

**Response:** See response 496.

**527.1 By taking advantage of existing snowmobile parking lots and trail corridors**

**Response:** See response 496.

**527.2 By reopening some old logging roads as off-road vehicle trails**

**Response:** See response 496.

- 528. The Wasatch-Cache National Forest should not expand the motorized trail network because there is already sufficient opportunity.**

**Response:** See response 525.

- 529. The Wasatch-Cache National Forest should first maintain and streamline the existing motorized trail system before constructing new trails.**

**Response:** See response 525.

- 530. The Wasatch-Cache National Forest should provide more motorized loop trail systems to reduce damage and user-created trails.**

**Response:** See response 496.

- 531. The Wasatch-Cache National Forest should develop motorized loop trail systems at the completion of timber sales to compensate for loss of opportunity due to road closures.**

**Response:** See responses 525 and 496.

- 532. The Wasatch-Cache National Forest should spend more money to build durable off-road vehicle trails.**

**Response:** See response 496.

- 533. The Wasatch-Cache National Forest should build more single-track motorcycle and mountain bike trails.**

**Response:** See response to concern statements 525 and 496.

- 534. The Wasatch-Cache National Forest should not designate single use trails to prevent increases in trail density**

**Response:** See response 525.

Trail Construction and Reconstruction in Roadless Areas

- 535. The Wasatch-Cache National Forest should allow motorized trail construction in roadless areas should be consistent with the Roadless Area Conservation Rule.**

**Response:** See response 525

- 536. The Wasatch-Cache National Forest should not build motorized trails in roadless areas because there are enough trails already.**

**Response:** See response 525

Trail Construction and Reconstruction – Site Specific

- 537. The Wasatch-Cache National Forest should complete the Bonneville Shoreline Trail.**

**Response:** The Bonneville Shoreline Trail is identified as one of the objectives in the Forest Plan.

- 538. The final Forest Plan should include some means of accommodation for routing of the Bonneville Shoreline Trail through roadless and wilderness areas.**

**Response:** Law sets wilderness designations. It is outside the scope of this document to make such recommendation in regards to the Bonneville Shoreline Trail until an analysis to address this site-specific concern is completed.

- 539. The Wasatch-Cache National Forest should expand Objective 20 to assure that completion of the Bonneville Shoreline and Great Western trails will not adversely impact protected species.**

**Response:** We will be following the response to the concern statement 425 in this area.

- 540. The Wasatch-Cache National Forest should reconstruct the Pfeifferhorn hiking route.**

**Response:** See response 496.

- 541. The Wasatch-Cache National Forest should reconstruct the trail to the top of Mount Ogden for public safety.**

**Response:** See response 496.

- 542. The Wasatch-Cache National Forest should extend the North American Trail.**

**Response:** See response 496.

- 543. The Wasatch-Cache National Forest should complete the Great Western Trail. Adopt proposed Alternative 7 to facilitate future additions.**

**Response:** The completion of the Great Western Trail is identified as one of the Forest Plan Objectives.

- 544. The Wasatch-Cache National Forest should adjust prescription boundaries to increase motorized acreage on the Logan Ranger District so that developing an off-road vehicle trail system is possible in the area.**

**Response:** See response 525.

- 545. The Wasatch-Cache National Forest should not adjust prescription boundaries in order to develop a motorized trail system on the Logan Ranger District.**

**Response:** See response 525.

- 546. The Wasatch-Cache National Forest should create a trail between the Iron Mine Trail and the Murdock Basin trail system. (43310)**

**Response:** See response 496.

- 547. The Wasatch-Cache National Forest should establish a Pullen Creek Trail. (43310)**

**Response:** See response 496.

- 548. The Wasatch-Cache National Forest should create parallel two-track trails in the Norway Flats area.**

**Response:** See response 496.

- 549. The Wasatch-Cache National Forest should extend the trail system in the Monte Cristo area on the Ogden Ranger District.**

**Response:** See response 496.

#### Trail Maintenance

- 550. The Wasatch-Cache National Forest should increase trail maintenance to prevent damage caused by rerouting.**

**Response:** The Forest tries to balance the management of resources within budgetary constraints. Standard 3 directs the Forest to close unauthorized trails and roads.

- 551. The Wasatch-Cache National Forest should invest more resources in trail maintenance due to damage caused by increasing off-road vehicle and hiking use.**

**Response:** See response 550.1

- 552. The Wasatch-Cache National Forest should clear trails early in the season to prevent damage caused by rerouting.**

**Response:** Thanks for your comment.



- 553. The Wasatch-Cache National Forest should adopt trail maintenance methods to reduce stream sedimentation.**

**Response:** Thank you for your comment.

- 554. The Wasatch-Cache National Forest should redesign problem trails rather than close them to user groups whenever possible.**

**554.1 Mountain bikes**

**554.2 Motorized**

**Response:** Thank you for your suggestion. See response 496.

- 555. The Wasatch-Cache National Forest should improve the safety of trails used by horses.**

**Response:** See response 496.

- 556. The Wasatch-Cache National Forest should increase winter grooming and snowplowing.**

**Response:** See response 496.

- 557. The Wasatch-Cache National Forest should begin using conveyor belt rubber for water bar construction.**

**Response:** Thank you for your suggestion.

#### Trail Closure for Wildlife

- 558. The Wasatch-Cache National Forest should use seasonal rather than permanent closures for wildlife wherever possible.**

**Response:** Thank you for your suggestion. See response 496.

- 559. The Wasatch-Cache National Forest should only close trails to motorized use if negative wildlife impacts are specifically documented.**

**Response:** We appreciate your opinion but will continue to provide for wildlife through seasonal closures as deemed necessary on a site-specific basis. See response 496.

#### Trail Removal and Obliteration

- 560. The Wasatch-Cache National Forest should not rip and brush double-track trails to convert them to single track.**

**Response:** See response 496.

- 561. The Wasatch-Cache National Forest should prevent user-caused conversion of single-track trails to off-road vehicle trails through closures and enforcement.**

**Response:** See response 496.

- 562. The Wasatch-Cache National Forest should relocate any routes that would otherwise be closed by timber, mining, or grazing activities.**

**Response:** See response 496.

- 563. The Wasatch-Cache National Forest should restore the obliterated section of the trail seven miles from Oakley starting from the Weber Canyon Road.**

**Response:** See response 496.

## **Travel Management – Planning**

### **Adequacy of Analysis**

- 564. The Wasatch-Cache National Forest should inventory and ground-truth all roads and trails during the travel management planning process.**

**Response:** See response 496.

- 565. The Wasatch-Cache National Forest should add an estimate of the number of miles and locations of user-created trails to the Final EIS.**

**Response:** See response 496.

- 566. The Wasatch-Cache National Forest should add a column to Draft EIS Table 2-2 for the number of miles of trails closed to mountain bikes by alternative listing specific trail closures.**

**Response:** The column has been added as table REC-13 in the FEIS. We have tried to list individual trail closures in the description of alternative in the FEIS.

- 567. The Wasatch-Cache National Forest should add a column for motorized recreation to tables that define allowed activities by management prescription category.**

**Response:** We believe that this is better identified during travel management planning. Many management prescription categories allow travel on existing roads through the MPC but do not allow new trail construction. A yes or no in the description for motorized use allowable activities would not fully address the complexity of travel management by management prescription category.

- 568. The Wasatch-Cache National Forest should improve the cumulative effects analysis in the Final EIS.**

**Response:** See response 496.

- 568.1 By assessing the number of miles and acres of motorized closures**

**Response:** See response 496.

- 568.2 By analyzing the cumulative effects of foundation funding of environmental groups on motorized access**

**Response:** This is beyond the scope of this analysis.

**569. The travel management plan should fully consider the issues found in publication FS-643, Roads Analysis and evaluate specific questions.**

**Response:** The roads analysis, for maintenance level 3-5 roads, has been completed and the findings are in the FEIS. Factors deemed appropriate for the Wasatch-Cache were analyzed. See also response 569.1

**570. The Wasatch-Cache National Forest should add more statistics about use levels and opportunities for different recreational types.**

**Response:** We appreciate your opinion on how an analysis could be done on motorized use. We however disagree and have complete what we believe is an appropriate level of analysis in the FIES.

**571. The Wasatch-Cache National Forest should conduct more research on comparative effects of different uses.**

**571.1 Relative impacts of recreational uses**

**Response:** Thank you for your comment. As opportunities exist attempts will be made to do additional research in this area.

**571.2 Relative non-recreational versus recreational impacts**

**Response:** Thank you for express your opinion.

**572. The Wasatch-Cache National Forest should conduct more research on user numbers by recreational type to have accurate numbers for allocation decisions.**

**Response:** A use survey will be conducted on the Wasatch-Cache during fiscal year2003

**573. The Wasatch-Cache National Forest should develop a travel management plan alternative that better meets motorized recreationists' needs.**

**Response:** See response 496.

Legal Considerations

**574. The Wasatch-Cache National Forest should ensure that the travel plan complies with the Multiple Use Sustained Yield Act by keeping roads and trails open to motorized recreation.**

**Response:** We believe that the FEIS and the Forest Plan are consistent with the Multiple Use Sustained Yield Act as identified in the FEIS. See multiple-use as defined in the Forest Plan.

**575. The Final EIS should discuss how Executive Orders 11644 and 11989 interfere with multiple use management for motorized recreation.**

**Response:** We appreciate your opinion in this area. With these two orders being Executive Orders, both being in place for over 25 years, and with Code of Federal Regulations 36 CFR 295.2 Planning and Designation for Use of Vehicles Off forest Development Roads, we believe the discussion of existing condition provide an

adequate description of recreation use on the forest with respect to these two executive orders. See also response to concern state 496.

**576. The Wasatch-Cache National Forest should not interpret Executive Orders 11644 and 11989 to require minimizing user conflicts. Non-motorized users who object to motorized uses should stay in non-motorized zones.**

**Response:** We appreciate your opinion in this area. However, in the Code of Federal Regulations 36 CFR 295.2 Planning and Designation for Use of Vehicles Off forest Development Roads, it states: “Off-road vehicle management plans shall provide vehicle management direction aimed at resource protection, public safety of all users, minimizing conflicts among users, and provide for diverse use and benefits of the National Forests.”. It goes on to state, “Areas and trails shall be located to minimize conflicts between off-road vehicles use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.”

We continue to follow national direction provided in the law, Executive Orders, the Code of Federal Regulation and Forest Service Manuals. See also response 496.

**577. The Wasatch-Cache National Forest should not convert sections of the Continental Divide Trail to non-motorized use. Because it violates the intent of the National Trails System Act.**

**Response:** See response 496.

Travel Management Mapping

**578. The Wasatch-Cache National Forest should correct Recreation Opportunity Spectrum mapping errors.**

**578.1 Skyline trail**

**Response:** Thank you for your comment the change has been made to the ROS maps.

**578.2 Lewis Peak spur**

**Response:** Thank you for your comment the change has been made to the ROS maps.

**578.3 Upper South Fork Roadless Area winter motorized use**

**Response:** Thank you for your comment the changes has been made in Winter Recreation maps for alternatives 1-6.

**579. The Wasatch-Cache National Forest should improve the quality of travel and visitor maps.**

**Response:** This is outside the scope of this document but the comment will be retained and could be considered during the revising of the travel plans and visitor maps

**579.1 By making the format consistent**

**Response:** See response 579.

**579.2 By making the format consistent with Bureau of Land Management maps**

**Response:** See response 579.

**580. The Wasatch-Cache National Forest should issue route maps with planning documents.**

**Response:** You are correct. We are not revising the travel plan maps with this document.

**581.1 The Wasatch-Cache National Forest should make travel management maps more readily available**

**Response:** See response 579.2.

**581.2 By adding vending machines**

**Response:** See response 579.2.

Travel Management Allocation Decisions

**582. The Wasatch-Cache National Forest should adjust management prescription allocations to match current winter motorized travel maps.**

**Response:** The Winter Recreation maps used Management Prescription Categories to defined Wilderness and recommended Wilderness and other non-motorized categories, see all Winter Recreation alternative maps.

**583. The Wasatch-Cache National Forest should adjust non-motorized boundaries so that adjacent motorized trails remain open.**

**Response:** We have done this to the best of our knowledge.

**584. The Wasatch-Cache National Forest should clarify whether management prescription categories are prescriptive or descriptive. By revising Recreation Opportunity Spectrum maps and plan to clearly state what is allowed where.**

**Response:** The Management Prescription Categories are both prescriptive by identifying a list of allowed activities in a particular Management Prescription Category and descriptive by describing some of the tools that can be used to achieve an objective. See Revised Forest Plan, Chapter 4, Forestwide Allocations, Management Prescription Categories.

The purpose of the Recreation Opportunity Spectrum is to provide way to for managers to identify and create recreation settings from Primitive to Urban that allow recreationists to choose from a spectrum of recreation opportunities that meet the desire experience they are seeking. District Travel Plans, Winter Recreation Maps, Management Prescription Category Maps, and Oil and Gas Maps provide the framework to identify the location on the Forest for what is allowed.

- 585. The Wasatch-Cache National Forest should resolve contradictions between Recreation Opportunity Spectrum mapping and management prescription category descriptions. This is also true for motorized recreation management in Management Prescription Category 2.6.**

**Response:** Thank you for your comment. An analysis was conducted to find where conflicts occur in all of the alternatives between the Recreation Opportunity Spectrum and Management Prescription Categories (MPC). Where Recreation Opportunity Spectrum categories could be adjusted to be compatible the MPC category they were. Otherwise if there is a conflict between the two allocations Management Prescription Categories takes precedence. See Revised Forest Plan, Chapter 4, B. Forestwide Allocations.

There is no conflict with existing motorized use in this Management Prescription Category (MPC) as identified in District Travel Plans and Forestwide Winter Recreation Travel plans. The Recreation Opportunity Spectrum (ROS) would have recognized the existing motorized use and it would have been mapped accordingly. See Alternative ROS and MPC maps.

- 586. The Wasatch-Cache National Forest should define how conflicts would be resolved when Recreation Opportunity Spectrum and management prescription categories conflict.**

**Response:** Thank you for identifying this potential conflict. As you will notice in the introduction to Forestwide Allocations in the Forest Plan we have inserted, “However, in the instance of a conflict between direction for a Management Prescription and any of the three other layers, the Management Prescription takes precedence.” The three other layers identified in the paragraph are Recreation Opportunity Spectrum (ROS), Winter Recreation (WR) and the Scenery Management System (SMS).

- 587. The final Forest Plan should state that the Winter Recreation Opportunity Spectrum category will take precedence over the management prescription category if there is a conflict.**

**Response:** See response 586.

- 588. The Wasatch-Cache National Forest should remove prescriptions that can be misinterpreted when Recreation Opportunity Spectrum and management prescription categories conflict.**

**Response:** See response 586.

- 589. The Wasatch-Cache National Forest should remove the summer Recreation Opportunity Spectrum maps from the final Forest Plan because they make site-specific motorized route determinations**

**Response:** See FEIS, Chapter 3, Topic 4-Recreation/Scenery Management, General Effects, Summer Recreation.

- 590. The Wasatch-Cache National Forest should not establish different planning processes for summer and winter travel management. The Wasatch Cache National Forest should make changes to summer and winter Recreation Opportunity Spectrum maps where necessary.**

**Response:** There was an attempt to use the ROS process for Winter Recreation, but it did not address the questions being ask by the public of “*When does Winter Recreation Management begin and end? Where can I snowmobile? Where can’t I snowmobile? and Where is Heli-skiing allowed?*” See FEIS, Appendix B-6, Recreation Opportunity Spectrum and Winter Recreation Mapping.

See also response to concern state 496.

- 591. Travel planning should differentiate between off-road vehicle and motorcycle travel management.**

**Response:** The FEIS does recognize the difference between motorcycle and ATV travel. See the Recreation section in the FEIS.

#### **Travel Management – Motorized Access to Forest Resources**

##### Motorized Access to Forest Resources General

- 592. The Wasatch-Cache National Forest should keep existing roads and trails open for the benefit of livestock producers.**

**Response:** See response 455. We recommend that site-specific comments be brought up during travel management planning. See also response 496.

- 593. The Wasatch-Cache National Forest should allow winter motorized use to facilitate predator management.**

**Response:** See response 496.

- 594. The Wasatch-Cache National Forest should keep existing roads and trails open to allow access for scientific study of paleontological resources.**

**Response:** We recommend that site-specific comments be brought up during travel management planning. See also response 496.

- 595. The Wasatch-Cache National Forest should keep existing roads and trails open to allow access for ease of fuels reduction and firefighting.**

**Response:** See the roads and fire analysis in the FEIS Chapter 3 and 10.

- 596. The Wasatch-Cache National Forest should keep existing roads and trails open to allow ease of access for hunting.**

**Response:** The Forest is accessible. See roads analysis in the FEIS and the Forest Plan.

## Adequacy of Analysis

**597. The Final EIS should analyze the effects of motorized travel restrictions on fire and timber management.**

**Response:** See response 496.

## Motorized Access and Wildlife

**598. The Wasatch-Cache National Forest should only restrict motorized use of roads in sensitive big game habitat.**

**Response:** See the effects from roads section in chapter 3 of the FEIS. See also response 496.

## Travel Management – Roads and Trails

### Roads General

**599. The Wasatch-Cache National Forest should designate dual-purpose roads in the travel management plan to allow off-road vehicles to legally use existing forest roads.**

**Response:** See response 496.

**600. The Wasatch-Cache National Forest should adopt the proposed “closed unless posted open” standard because it eliminates the motive to destroy signs.**

**Response:** See standard 15. Thank you for your support in this area.

**601. The Wasatch-Cache National Forest should adopt an “open unless posted closed” motorized use policy and include reason for closure on signs.**

**Response:** We believe that having that designation route for where motorized use is allowed is consistent with 36 CFR 295. Direction is given to administratively designate and locate specific areas and trails of National Forest System lands on which the use of vehicles travel is allowed, restricted, or prohibited. Standard 16 reaffirms that summer motorized access is managed on an open on designated route basis.

**602. The Wasatch-Cache National Forest should restrict all users to designated routes.**

**Response:** See response to concern statements 601. and 496.

**603. The Wasatch-Cache National Forest should restrict snowmobiles to designated roads.**

**Response:** Restricting snowmobiles to designated routes only was not considered as an alternative because of increased management requirements and that resource damage held at a minimum once adequate snow depths are achieved.



**604. The Wasatch-Cache National Forest should better sign areas closed to snowmobiles.**

**Response:** This is outside the scope of the Revised Forest Plan, but will forward the information to the responsible managers for their consideration.

Trails General

**605. The Wasatch-Cache National Forest should identify trail systems by riding units rather than individual trail segments.**

**Response:** This is a travel management questions that is outside the scope of the Forest Plan analysis. Trails are broken down into small segments to track trail conditions and maintenance.

**606. The final Forest Plan should keep all trails in roadless areas open to motorized use.**

**Response:** In all alternatives existing motorized trails remained opened, except Alternatives 1 & 2 where portions of the Forest were recommended for Wilderness. See FEIS, Topic 5-Roadless areas – Effects on Wilderness characteristics and roadless area Values, and Wilderness Management for motorized trails that were affected by the alternatives.

**607. The final Forest Plan should prohibit motorized travel on all trails due to user conflicts and trail damage.**

**Response:** Thank you for expressing your feelings. This is beyond the scope of the Revised Forest Plan, but we will forward the information to the responsible managers for their consideration.

Specific Roads and Trails

**608. The Wasatch-Cache National Forest should exclude Franklin Basin from a summer motorized trail network.**

**Response:** See response 496.

**609. The Wasatch-Cache National Forest should keep Providence and Millville Canyon Roads open.**

**Response:** See response 496.

**610. The Wasatch-Cache National Forest should not zone the East Fork Lodge trail area as non-motorized.**

**Response:** See response 496.

**611. The Wasatch-Cache National Forest should reopen the Turkey Trail to off-road vehicle use.**

**Response:** See response 496.

- 612. The Wasatch-Cache National Forest should reopen the Leatham Hollow and Card Canyon East Trails to motorcycle use.**  
**Response:** See response 496.
- 613. The Wasatch-Cache National Forest should close the Willard Basin Road due to continuing erosion in the area.**  
**Response:** See response 496.
- 614. The Wasatch-Cache National Forest should open the North Slope Road to off-road vehicle use.**  
**Response:** See response 496.
- 615. The Wasatch-Cache National Forest should close and block the ford across the West Fork Blacks Fork to prevent motorized violations of wilderness area boundaries.**  
**Response:** See response 496.
- 616. The Wasatch-Cache National Forest should open Whitney Road (FR22) to off-road vehicle use.**  
**Response:** See response 496.
- 617. The Wasatch-Cache National Forest should not close Bear River Smiths Fork Trail 091 to motorized use.**  
**Response:** See response 496.
- 618. The Wasatch-Cache National Forest should close Bear River Smiths Fork Trail to motorized use.**  
**Response:** See response 496.
- 619. The Wasatch-Cache National Forest should open specific roads and trails near Smith and Morehouse Reservoir to off-road vehicle use.**  
**619.1 Smith and Morehouse Reservoir to Gardner's fork road**  
**619.2 Smith and Morehouse Reservoir to Little Elk Lake**  
**Response:** See response 496
- 620. The Wasatch-Cache National Forest should open Hoyt Park to the Swift Canyon off-road vehicle Trail to off-road vehicle use.**  
**Response:** See response 496
- 621. The Wasatch-Cache National Forest should open Mineral Fork Trail, in Big Cottonwood Canyon, to off-road vehicle use.**  
**Response:** See response 496
- 622. The Wasatch-Cache National Forest should keep Mineral Fork road open to motorized use.**  
**Response:** See response 496

- 623. The Wasatch-Cache National Forest should open Dog Lake Trail, in Big Cottonwood Canyon, to off-road vehicle use.**  
**Response:** See response 496
- 624. The Wasatch-Cache National Forest should open Cardiff Fork Trail to off-road vehicle use.**  
**Response:** See response 496
- 625. The Wasatch-Cache National Forest should close Tri-Canyon Trails to motorized use and enforce the closures.**  
**Response:** See response 496
- 626. The Wasatch-Cache National Forest should close Twin Creeks Road as proposed in Alternative 1 due to Sensitive soils and Non-motorized recreational values.** **Response:** See response 496
- 627. The Wasatch-Cache National Forest should reopen the jeep road in South Fork Canyon.**  
**Response:** See response 496
- 628. The Wasatch-Cache National Forest should reopen Bunchgrass Road**  
**Response:** See response 496
- 629. The Wasatch-Cache National Forest should reopen roads to the Old Ephraim monument.**  
**Response:** The road up Temple Fork to the area is currently open in the travel plan.

#### Specific Areas

- 630. The Wasatch-Cache National Forest should not limit motorized access in the Blacksmith Fork area.**  
**Response:** See response 496. The selection of an alternative for the management of the Forest is one made by the Forest Supervisor. It is not a vote.
- 631. The Wasatch-Cache National Forest should allow motorcycle use in Ricks Canyon.**  
**Response:** See response 496
- 632. The Wasatch-Cache National Forest should develop an off-road vehicle system on the Logan Ranger District.**  
**632.1 Because it is a requirement under the Recreation Opportunity Spectrum**  
**Response:** We are using ROS as a description of recreational experience. The use of this description does not require that all categories be used on any one area. See the description of ROS in the Forest Plan and response 496

**632.2 To meet growing and projected demands**

**Response:** See response 496. We recognize that we will not be able to meet the demands of all recreational groups on the Wasatch-Cache National Forest.

**633. The Wasatch-Cache National Forest should allow off-road vehicle use in Logan Canyon.**

**Response:** See response 496. ATV use in Logan Drainage is not closed with this FEIS. See the Desired Future Condition as identified in the Forest Plan.

**634. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Temple Peak Roadless Area (Swan Creek Drainage) to allow construction of motorized trails.**

**Response:** See response 496

**635. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Swan Creek Roadless Area to allow construction of motorized trails.**

**Response:** Alternative 5 ROS map shows this area as being managed as Semi-Primitive Motorized, but it does not allow the construction of new motorized trails. New motorized trail construction is outside of the scope of the Revised Forest Plan. Also see response to concern statement 496.

**636. The Wasatch-Cache National Forest should change the summer Recreation Opportunity Spectrum for the Beaver Mountain area.**

**Response:** See response 496

**637. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Mount Logan South Roadless Area to allow construction of motorized trails.**

**Response:** See response 496

**638. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Mount Logan North Roadless Area to allow construction of motorized trails.**

**Response:** See response 496

**639. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Gibson Roadless Area to allow construction of motorized trails.**

**Response:** See response 496

**640. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Right Hand Fork Roadless Area to allow construction of motorized trails.**

**Response:** See response 496

- 641. The Wasatch-Cache National Forest should reduce motorized acreage on the Logan Ranger District due to environmental and human health impacts**  
**Response:** See response 496
- 642. The Wasatch-Cache National Forest should designate Bunchgrass Hollow White Pine Canyon, Steam Mill Canyon, Hells Kitchen Canyon, Steep Hollow, Blind Hollow, and Logan Dry Canyon as non-motorized.**  
**Response:** These areas were considered closed to motorized travel in Alternatives 1 and 2. See Winter Recreation maps Alternatives 1 and 2.
- 643. The Wasatch-Cache National Forest should keep summer motorized closures in the Mahogany Ridge Roadless Area for wildlife.**  
**Response:** See response 496.
- 644. The Wasatch-Cache National Forest should change the Recreation Opportunity Spectrum for the Mahogany Range Roadless Area to allow construction of motorized trails.**  
**Response:** See response 496.
- 645. The Wasatch-Cache National Forest should designate Providence Canyon quarry open as a motorized challenge park area. Change management prescription category to read “Open on Designated routes and Areas”**  
**Response:** See response 496.
- 646. The Wasatch-Cache National Forest should restrict summer motorized use in Public Grove to existing designated routes.**  
**Response:** See response 496
- 647. The Wasatch-Cache National Forest should designate the Lewis Peak Roadless Area non-motorized or limit motorized users to alternate days by adding language to Forest Plan.**  
**Response:** See response 496.
- 648. The Wasatch-Cache National Forest should designate the Willard Roadless Area non-motorized.**  
**Response:** See response to 496.
- 649. The final Forest Plan should include new language to allow closure of Willard Basin to motorized travel if mitigation of off-road vehicle damage is not possible.**  
**Response:** See response 496.
- 650. The Wasatch-Cache National Forest should close Taylor Canyon to motorized use and development.**  
**Response:** See response 496.

- 651. The Wasatch-Cache National Forest should leave the area on the West Fork of Blacks Forks accessible by vehicles in all of the alternatives.**

**Response:** The West Fork of Blacks Fork is accessible by vehicles in all alternatives.

- 652. The Wasatch-Cache National Forest should prohibit all recreational motorized use in the Tri-Canyon area for watershed protection.**

**Response:** See response 496.

- 653. The Wasatch-Cache National Forest should prohibit all recreational motorized use in Mineral Fork in Big Cottonwood Canyon.**

**Response:** See response 496.

- 654. The Wasatch-Cache National Forest should prevent motorized recreation by cabin owners in closed areas of Big Cottonwood Canyon.**

**Response:**

- 655. The Wasatch-Cache National Forest should open White Pine Canyon to motorized vehicle access.**

**Response:** See response 496

- 656. The Wasatch-Cache National Forest should zone Mineral Basin in American Fork Canyon as a summer non-motorized recreational zone.**

**Response:** This area is on the Uinta National Forest and is outside the scope of the analysis.

- 657. The Wasatch-Cache National Forest should allow motorized use in American Fork Canyon.**

**Response:** This area is on the Uinta National Forest and is outside the scope of the analysis.

### **Travel Management – Motorized Seasonal Restrictions**

#### **Motorized Seasonal Restrictions General**

- 658. The Wasatch-Cache National Forest should institute seasonal closures for infrastructure along stream corridors.**

**Response:** See response 496

- 659. The final Forest Plan should institute diurnal closures of existing roads across amphibian travel routes during the breeding season.**

**Response:** We encourage the commenter to assist in identifying such routes during travel management planning. This would allow an interdisciplinary team to identify appropriate mitigation measures.

- 660. The Wasatch-Cache National Forest should eliminate seasonal closures during hunting seasons for hunter safety.**

**Response:** We believe we need the flexibility to close roads to prevent resource damage. The use of firearms, no matter what the concentration of the public, is dangerous. Hunters should be aware of this and take appropriate action.

- 661. The Wasatch-Cache National Forest should further restrict mountain biking in Millcreek Canyon by limiting the number of days mountain bikes can use the Lower Pipeline Trail.**

**Response:** See response 496

- 662. The Wasatch-Cache National Forest should not close trails to mountain biking in the Tri-Canyon area especially Mill D North Trails.**

**Response:** See response 496

- 663. The Wasatch-Cache National Forest should restrict mountain biking in Big and Little Cottonwood Canyons.**

**Response:** See response 496

- 664. The Wasatch-Cache National Forest should restrict mountain biking on the east slopes of the Mount Naomi Wilderness by recommending wilderness designation.**

**Response:** This action is considered in Alternatives 1, 2, 3 and 6 in varying amounts depending upon the areas considered for Recommended Wilderness. See FEIS Chapter 3, Topic 4 Recreation/Scenery Managements, section Effects on Recreation from Inventoried Roadless Area Management.

#### Motorized Seasonal Restrictions – Site-Specific

- 665. The Wasatch-Cache National Forest should seasonally close FR 086 to any vehicle over 500 pounds.**

**Response:** See response 496

#### Travel Management – Winter Motorized

##### Winter Motorized General

- 666. The Wasatch-Cache National Forest should not override Forest Plan management prescription category closures with special winter motorized travel maps.**

**Response:** Management prescriptions are defined as “management practices, intensity selected and scheduled for application on a specific area to attain multiple-use and other goals and objectives”. Management Prescription Categories provide a general sense of the management or treatment of the land intended to result in a particular condition being achieved or set of values being restored or maintained. Emphasis as used in these prescriptions is defined as focus or

highlighting, not exclusive or “dominant” use. In the event of a conflict between uses, resolution will be based on the specific merits of the situation rather than assuming that the Prescription implies a “trumping “ of one resource over another. The entire Management Direction Package for the area must be considered, not just the prescription. This package includes a winter recreation map displaying areas open for or closed to motorized use. Most MPC’s do not define whether or not winter recreation is allowed. Designated wilderness 1.1-1.4 is the only MPC that by definition does not allow motorized use.

**667. The final Forest Plan should adopt clear and enforceable winter motorized closures throughout the forest.**

**Response:** The Forest Service enforces existing laws and regulations through law enforcement and forest personnel. Travel management decisions, similar to all other decisions, made in the Forest Plan are based upon a variety of factors such as current use and public expectations, watershed and resource protection and ecosystem management. Mapping of decisions made in the Forest plan is the first step. This will be followed by signing, education and enforcement. The Forest Service will continue to work to educate user groups and individuals to prevent violations as well as through law enforcement activities.

Winter Motorized – Site-Specific

**668. The Wasatch-Cache National Forest should close Smithfield Canyon to motorized vehicles in the winter.**

**Response:** In the Wasatch-Cache Final EIS, Alternatives 1, 6, and 7 close Smithfield Canyon to Winter Motorized use.

**669. The Wasatch-Cache National Forest should close Smithfield Canyon to winter snowmobile use due to damage occurring in low snow conditions.**

**Response:** See response 668. The Wasatch- Cache Forest plan establishes a minimum snow depth of 12 inches. This snow depth is believed to be enough to protect the underlying resources and block most non-over the snow motorized use.

**670. The Wasatch-Cache National Forest should designate Logan Dry Canyon as winter non-motorized for safety reasons.**

**Response:** The Wasatch-Cache Forest Plan provides for Broad Scale Forest wide direction for management of Forest Lands. Specific travel management decisions such as this are based upon a variety of factors, including current public use and expectations, resource protection safety and compliance with applicable direction. Alternatives 1, 2, 6& 7 in the Final EIS close Dry Canyon to Motorized use.

**671. The Wasatch-Cache National Forest should allow winter off-road vehicle use on the Hoyt Peak Trail.**

**Response:** The Wasatch-Cache Forest Plan provides for Broad Scale Forest wide direction for management of Forest Lands. Specific travel management decisions such as this are based upon a variety of factors, including current public use and



expectations, resource protection and compliance with applicable direction. Every Alternative in the Final EIS except for Alternative 1 and 2 allows off road winter motorized use on the Hoyt Peak Trail.

**672. The Wasatch-Cache National Forest should allow snowmobile use in the Willard area.**

**Response:** The Wasatch-Cache Forest Plan provides for Broad Scale Forest wide direction for management of Forest Lands. Specific travel management decisions such as this are based upon a variety of factors, including current public use and expectations, resource protection and compliance with applicable direction. In the Final EIS, Alternatives 1 and 2 allow winter motorized use on the existing road in the Willard area. In addition, Alternative 3 allows winter-motorized use off road in the Willard Area.

**673. The Wasatch-Cache National Forest should not close Tony Grove and adjacent areas to snowmobiles because closures are unmanageable due to surrounding open areas.**

**Response:** Alternatives 3,4 and 5 in the Wasatch-Cache Final EIS allow increased motorized use in the Tony Grove area.

**674. The Wasatch-Cache National Forest should close Tony Grove area to winter snowmobile use. This would also make the wilderness boundary enforceability.**

**Response:** Alternatives 1&2 in the Final EIS close the Tony Grove area winter motorized use in this area. The Mt. Naomi Wilderness Boundary is well mapped and properly signed. It is every one's responsibility using this area to know where the wilderness boundary is and to obey the rules and laws governing that area's use.

**675. The final Forest Plan should increase winter non-motorized zones to protect the yurt system on the Logan Ranger District from snowmobile intrusions.**

**Response:** Alternatives 1 & 2 close this area for motorized use. Alternative 7 in the Wasatch-Cache Final Environmental Impact Statement does not allow motorized use in a specific area between the Bunchgrass and Steep Hollow drainages within the Mt. Naomi roadless area. Please refer to the winter recreation maps in the Revised Forest Plan.

**676. The Wasatch-Cache National Forest should close the area from Tony Grove turnoff to the Idaho border to winter motorized use.**

**Response:** Winter motorized use along with non-motorized use will continue to be allowed. The Wasatch-Cache National Forest provides many types of recreational opportunities, one being snowmobile use. There will be areas of winter motorized use and areas of winter non-motorized use identified on winter recreation maps. Refer to response 675.

- 677. The Wasatch-Cache National Forest should close the area west of Franklin Basin Road to winter motorized use so that boundaries follow terrain features for ease of enforcement.**

**Response:** Please refer to responses 675 & 676.

- 678. The Wasatch-Cache National Forest should create a ski-only trail in Franklin Basin.**

**Response:** Please refer to responses 675 & 676.

- 679. The Wasatch-Cache National Forest should close Garden City Canyon and the adjacent area to winter motorized use.**

**Response:** Please refer to responses 675 & 676.

- 680. The Wasatch-Cache National Forest should close the area west of Highway 89 in Sink Hollow to winter motorized use because Skiing and Snowmobiling are incompatible uses.**

**Response:** Winter motorized use along with non-motorized use will continue to be allowed. The Wasatch-Cache National Forest provides many types of recreational opportunities, one of them being snowmobile use. Please refer to winter ROS maps in Revised Forest Plan that show areas which are open and which areas are closed to winter motorized use.

- 681. The Wasatch-Cache National Forest should not close the area in Sink Hollow to winter motorized use.**

**Response:** Refer to response's 676 and 680.

- 682. The Wasatch-Cache National Forest should expand winter non-motorized zones in the Logan area.**

**Response:** Alternatives 1 & 2 in the Wasatch-Cache Final EIS reduce the amount of motorized use on the Forest. Alternative 4 leaves the amount of motorize use the same. Alternative 6 does not allow motorized use in recommended Wilderness. Please refer to the Winter ROS maps in the Revised Forest Plan that show which areas are open and which areas are closed to winter motorized use in the Logan area.

**682.1 Into areas with adequate snow coverage.**

**Response:** There will be areas of winter motorized and winter non-motorized use mapped on the winter recreation maps as part of the Forest Plan and on District Travel Plans.

**682.2 Into less hazardous terrain for avalanche safety reasons.**

**Response:** There is a large amount of terrain in the Logan area mountains that has low slope angles and low avalanche hazard and is open only to winter non-motorized use. Alternative 7 in the Wasatch-Cache Final EIS makes the area from the Bunch Grass through the Steep Hollow drainages open to non-motorize use.

**683. The Wasatch-Cache National Forest should keep Green Canyon closed to snowmobiles.**

**Response:** The Revised Forest Plan keeps Green Canyon closed to Motorized use.

**684. The Wasatch-Cache National Forest should allow snowmobiles in Green Canyon.**

**Response:** The Revised Forest Plan keeps Green Canyon closed to Motorized use to allow for easily accessible non-motorized opportunity.

**685. The Wasatch-Cache National Forest should close the Temple drainage to winter motorized use due to conflicts with skiers.**

**Response:** The Forest Plan provides for broad scale management prescriptions and direction on how various areas will be managed. Areas of winter-motorized use along with areas of non-motorized use will continue to be allowed across the Forest. In Alternatives 1 & 2, winter motorized use is limited to existing roadways only with no off road use. Please refer to the Winter Recreation maps in the Forest Plan. Alternative 7 closes the Temple Fork drainage to winter motorized use to protect critical wildlife winter range. Areas of winter-motorized use along with areas of non-motorized use will continue to be allowed in specific areas of the Forest. The Forest will continue to look for ways to reduce conflicts with skiers.

**686. The Wasatch-Cache National Forest should keep the Twin Creeks area closed to snowmobile use.**

**Response:** In Alternatives 1, 2 & 6 of the Final Wasatch-Cache EIS, the Twin Creeks area is closed to winter motorized use.

**687. The Wasatch-Cache National Forest should close the Amazon Basin area to snowmobile use with one travel corridor for snowmobiles.**

**Response:** In Alternatives 1 & 2 of the Final Wasatch-Cache EIS, Amazon Basin is closed to winter motorized use.

**688. The Wasatch-Cache National Forest should change proposed winter motorized areas near the Wellsville Wilderness Area to non-motorized.**

**Response:** Winter motorized use along with non-motorized use will continue to be allowed. The Wasatch-Cache National Forest provides many types of recreational opportunities, one being snowmobile use. There will be areas of winter motorized use and areas of winter non-motorized use designed through management prescription allocations. Please refer to the Winter ROS maps in the Revised Forest Plan that show which areas are open and which areas are closed to winter motorized use in the Ogden area.

**689. The Wasatch-Cache National Forest should ban snowmobiles in Public Grove or restrict them to alternate days.**

**Response:** There will be areas of winter motorized use and areas of winter non-motorized use designed through management prescription allocations. Please refer

to the Winter ROS maps in the Revised Forest Plan that show which areas are open and which areas are closed to winter motorized use in the Logan area.

**690. The final Forest Plan should adopt the proposed snowmobile closure in the Lewis Peak area.**

**Response:** The Wasatch-Cache National Forest provides many types of recreational opportunities, one of them being snowmobile use. Winter motorized use along with non-motorized use will continue to be allowed. The Forest Service will continue to work to provide an appropriate mix of recreational uses in this area. Please refer to the Winter ROS maps in the Revised Forest Plan that show which areas are open and which areas are closed to winter motorized use in the Logan area mountains.

**691. The Wasatch-Cache National Forest should prohibit snowmobiling in the Snowbasin Land Exchange lands to offset the loss of cross-country skiing opportunities on the traded lands.**

**Response:** Alternatives 1 & 2 significantly reduce the amount of snowmobile use across the forest including the Snowbasin Land Exchange lands. The cross-country skiing opportunities have likely increased with the addition of approximately 10,000 acres of private lands becoming public lands as a result of the Snowbasin Land Exchange.

**692. The Wasatch-Cache National Forest should adopt Winter Travel Plan Alternative 3 for the Evanston District.**

**Response:** The Wasatch-Cache Final EIS covers a broad range of Alternatives affecting winter motorized travel across the Forest. Alternative 7 was chosen to provide a even balance between motorized and non-motorized use while trying to reduce conflicts between user groups.

**693. The Wasatch-Cache National Forest should close the area south of North Slope Road and the Lakes Roadless Area to snowmobile use in the absence of monitoring and complete lynx effects analysis.**

**Response:** There will be areas of winter motorized use and areas of winter non-motorized use mapped on the Evanston-Mountain View Ranger District. The Endangered Species Act directs all government agencies to protect species listed as threatened and endangered. This includes habitat. Eleven counties in Northern Utah are included as Lynx habitat by the US Fish and Wildlife Service (FWS). The Forest will work closely with the FWS on all mitigation requirements outlined for this species.

**694. The Wasatch-Cache National Forest should adopt the High Uinta Preservation Council's modified winter Recreation Opportunity Spectrum map for the North Slope which will reduce wilderness violations while leaving large open areas.**

**Response:** Alternatives 1, 2 & 6 in the Final EIS do not allow winter-motorized use in roadless areas.

**695. The Wasatch-Cache National Forest should open the North Slope of the High Uintas to snowmobiling.**

**Response:** Many areas of the North Slope of the High Uintas are already open to snowmobiling.

**695.1 Because the need statements are unsupported**

**Response:** Please refer to the Travel Management Section in the Wasatch-Cache EIS.

**695.2 Because lynx habitat requirements are not proven**

**Response:** The Endangered Species Act directs all government agencies to protect species listed as threatened and endangered. This includes habitat. 11 counties in Northern Utah are included as lynx habitat by the US Fish and Wildlife Service (FWS.) This includes the North Slope. The Forest will work closely with the FWS on all mitigation requirements they outlined for this species.

**696. The Wasatch-Cache National Forest should close the north end of the Upper South Fork Roadless Area to snowmobile use along with FR 073 and 201.**

**Response:** Please refer to the Winter ROS maps in the Revised Forest Plan that show which areas are open and which areas are closed to winter motorized use in this area.

**697. The Wasatch-Cache National Forest should prohibit winter motorized recreation in the Wasatch Front Range.**

**Response:** Winter motorized use along with non-motorized use will continue to be allowed in selected areas along the Wasatch Front. The Wasatch-Cache National Forest provides many types of recreational opportunities, one being snowmobile use. There will be areas of winter motorized use and areas of winter non-motorized use designed through management prescription allocations. Please refer to the Winter ROS maps in the Revised Forest Plan that show which areas are open and which areas are closed to winter motorized use in this area.

**698. The Wasatch-Cache National Forest should prohibit winter motorized recreation in the Tri-Canyon area.**

**Response:** The only land where snowmobiling is allowed in the Tri-Canyon area is Guardsman's Pass. Nearly all of the land in the Guardsman's Pass area, which is open to snowmobiling, is private. The Forest Service has no jurisdiction on private lands.

**699. The Wasatch-Cache National Forest should prohibit winter motorized use in the Guardmans Pass area to protect the watershed.**

**Response:** The Forest Service has no jurisdiction over private lands.

**700. The Wasatch-Cache National Forest should prohibit snowmobiling in roadless areas.**

**Response:** The Wasatch-Cache Final EIS covers a broad range of Alternatives covering winter motorized use. Alternatives 1, 2 & 6 of the EIS prohibits motorize use in roadless areas.

**701. The Wasatch-Cache National Forest should allow snowmobiling in roadless areas.**

**Response:** The Wasatch-Cache Final EIS covers a broad range of Alternatives covering winter motorized use. Alternative's 3 & 5 of the EIS allows motorize use in roadless areas.

**Travel Management – Mechanized**

Mechanized – Site-Specific.

**702. The Wasatch-Cache National Forest should keep the Big Water Trail open to mountain bikes.**

**Response:** The Wasatch-Cache National Forest provides many types of recreational opportunities including mountain biking. Please refer to the Salt Lake Ranger District Travel Management Plan for specific areas that are open to mountain biking. Trail managers at the Salt Lake Ranger District will continue to evaluate the existing trail system and will implement strategies to better manage the increasing use.

**Topic 4: Recreation and Scenery Management**

**Recreation and Scenery Management**

General Management

**703. The Wasatch-Cache National Forest should promote recreation as a primary goal of the Forest Plan.**

**Response:** Recreation is recognized as one of the primary uses on the WCNF. Goals for recreation are found in the Forest Plan Chapter 4, 2. Forestwide Goals and Subgoals.

**704. The Forest Service should include new language to emphasize providing beneficial recreation experiences in Guideline 41.**

**Response:** “Beneficial recreation experiences” was added to the Recreation Guideline. See Chapter 4 Revised Forest Plan, Recreation, Guidelines for Recreation Management.

**705. The Wasatch-Cache National Forest should implement the Forest Plan because it provides balanced recreation opportunities.**

**Response:** Thank you for your comment.

**706. The Wasatch-Cache National Forest should responsibly manage recreation and other forest uses.**

**Response:** See the Revised Forest Plan, Chapter 4, Forest Management Direction. This direction is intended to take the broad conceptual goals, allocations, standards and guidelines for a number of resources and uses and fit them together in a clear complementary way, given a particular area's land capabilities, needs and opportunities.

**706.1 In a balanced manner**

**Response:** See response 706.1.

**706.2 By making agency-authorized changes in forest policy.**

**Response:** The Forest is making agency-authorized changes in forest policy to responsibly managing recreation and other forest uses by following the NEPA process. See FEIS Chapter 1 Purpose and Need.

**706.3 By developing strict and enforceable standards to prohibit increased human use of the forests**

**Response:** The alternatives of the FEIS displays a range of human uses on the WCNF based on concerns such as recreation use conflicts, biodiversity and viability. The Forest Plan contains standards and guidelines that sets limits or courses of action to protect Forest resources. The intent of Forest Plan revision is not to prohibit increased human use of the Forest but to manage the Forest Resources.

**706.4 By recognizing that they do not have the resources to manage and mitigate impacts of the recreation based activities they are encouraging**

**Response:** Thank you for your comments. The WCNF manages the Forest within the funding that is available as described in the Social and Economic analysis section of the FEIS. During the Forest Plan revision process, we consider many ways to manage the WCNF and we feel that the direction for the management of resources and mitigation of impacts is adequate to managing activities on the WCNF.

**706.5 By adopting the principle of maximum tolerable impact for each visitor day**

**Response:** We feel that this type of assessment is appropriate at a site-specific analysis and not in Forest Plan revision. This is because Forest Plan revision considers the overall broad-scale management of the Forest. Site-specific analysis and use of specific methods for determining use or impacts would become so detailed that broad-level Forest planning would not be meaningful. Broad level Forest planning is the scale expected for Forest Plan revision.

**706.6 By allowing appropriate densities for motorized and non motorized routes based on ecological parameters**

**Response:** See response 706.5.

**707. The Wasatch-Cache National Forest should treat all user groups fairly.**

**Response:** Thank you for your comment. It is the intent of the Forest Plan revision process to treat all user groups fairly.

**707.1 By reallocating recreation boundaries to accommodate all recreation groups**

**Response:** Thank you for your comment. The FEIS presents seven alternatives that have various levels of motorized and non-motorized use on the WCNF. Within these alternatives a wide variety of recreation experience is being managed for from Primitive to Urban. See Table REC-11 for acres of Summer Recreation Opportunity Spectrum, Winter Recreation Table REC-12 for acres of Winter Recreation and FEIS Chapter 2, Alternatives Considered in Detail.

**707.2 By applying restrictions fairly to all user groups**

**Response:** Trail overuse and erosional impacts are usually analyzed at the site-specific level and the WCNF tries to make decisions on these issues fairly.

**707.3 By considering that favoring wilderness type activities in roadless areas only serves a narrow segment of the recreating public**

**Response:** The alternatives of the FEIS displays a range of uses allowed on the WCNF. The revised Forest Plan takes into account the diverse recreation population by allocating areas to different uses and is not intended to favor one group over another, but to manage use on the forest to avoid conflicts and manage multiple use.

**707.4 Because every activity has an impact**

**Response:** Thank you for your comment.

**708. The Wasatch-Cache National Forest should disperse recreational users.**

**Response:** The alternatives of the FEIS display a range of allowed uses for motorized vehicles. The amount of area allowed for motorized-recreation is considered in the decision.

**708.1 To lower the impact on the environment**

**Response:** The effects of motorized recreation are analyzed for each alternative and are considered in the decision.

**708.2 To lower the impacts on popular areas**

**Response:** See response to concern statement 708.2.

**709 The Wasatch-Cache National Forest should not restrict access**

**709.1 To avoid elitism**

**Response:** It is not the intent of Forest Plan revision to provide opportunities for use on public lands for wealthy special interest groups. We feel that the range of use allowed on lands within the WCNF as described in the alternatives of the FEIS is in response to issues and concerns identified through public participation and



does not eliminate the public from public land and is not elitist as indicated by the range of alternatives and uses considered in the FEIS.

**709.2 To protect freedom values**

**Response:** Thank you for your comment. Forest Plan revision considers both motorized and non-motorized uses on the WCNF because Forest System lands are managed for multiple-use. The WCNF does not close roads to restrict freedom, but may do so for other purposes such as watershed protection or other non-motorized uses that are considered important. That is one of the purposes of Forest Plan revision, that is, to display alternative uses of Forest System lands based on public participation and then decide how to manage the uses.

**710. The Wasatch-Cache National Forest should revise the winter recreation section in the Draft EIS to provide a more equitable and logical balance of winter recreation opportunities.**

**Response:** The FEIS considers the balance of winter recreation use in the range of alternatives and Alternative 7 specifically addresses non-motorized recreation in the Bear River Range. See Alternative 7 Winter Recreation maps and write-up in Appendix B-6 for development of Alternative 7 Winter Recreation maps.

**711. The Wasatch-Cache National Forest should develop winter recreation as one of the allocation tools used in the Forest Plan.**

**Response:** The WCNF does consider Winter Recreation in its land allocation as described in FEIS Appendix D – Allocation Framework D-3.

**712. The Wasatch-Cache National Forest should revise the Roadless Desired Condition to accommodate backcountry values, not wilderness values.**

**Response:** Roadless Desired Condition description has been revised and states that these areas are managed according to the management prescription applied. This includes areas where motorized uses are allowed, according to the prescription, but no road construction is allowed.

**713. The Wasatch-Cache National Forest should provide opportunities for quiet and solitude in ridgeline environments.**

**Response:** The alternatives of the FEIS display a range of allowed uses that provide opportunities for quiet and solitude. The desire of the public for various uses on the WCNF will be considered in the final decision.

**714. The final Forest Plan should adopt a more specific definition of “new recreation development.”**

**Response:** New recreation development has been changed to “New Campgrounds” in Comparison of Alternatives, Chapter 2, FEIS.

**715. The Forest Service should include stricter criteria for new recreation development in Guideline 41.**

**Response:** Since the issuance of the draft Forest Plan, guidelines for recreation development have been revised. We thank you for your comment. We feel that if these guidelines are tightened substantially, as you suggest, it will make it very difficult to manage recreation development for the needs of the public. We feel that concerns that are listed in your proposed guideline is best met during site-specific project implementation and that the revised Forest Plan should give broader guidance for recreation management.

Adequacy of Analysis

**716. The Wasatch-Cache National Forest should adequately analyze recreational impacts.**

**Response:** The “Guidelines for Recreation Management” were considered in the analysis of effects in the FEIS, Chapter 3 Affected Environment and Environmental Consequences.

**716.1 On wilderness**

**Response:** The effects of activities are addressed at a broad level which is the appropriate scale for Forest Planning. See response 706.5.

**716.2 By considering the impacts of future or new recreational activities, Such as paint ball.**

**Response:** See response 706.5. The revised Forest Plan provides direction to “Manage use of new recreation technology to reduce effects on the Forest”.

**716.3 By determining, in cooperation with SLPU, what backcountry uses adversely impact the environment**

**Response:** See response 706.5.

**716.4 By studying all aspects of human impact on the canyons, highway, and parking capacity, and all recreation including resort and backcountry use**

**Response:** See response 706.5.

**716.5 By addressing the ecological and social impacts that result from each type of recreation and deciding which habitat type is suitable for each activity**

**Response:** The FEIS identifies ecological and economic and social impacts of recreation activities in environmental consequences sections with primary discussions under Watershed Health and Biodiversity and Viability and Economic and Social Analysis. Regarding the concern of appropriate use of OHVs, the Forest Plan has a standard for “summer motorized and mechanized access is managed on an open on designated routes”, under Standards for Road/Trail and Access Management.

**716.6 By studying ways to control highway traffic and backcountry use**

**Response:** See response 706.5.

**716.7 By discarding the flawed Bradford study and using more accurate data on dispersed users**

**Response:** The analysis that you refer to is part of a previous site-specific analysis of heli-skiing and is not part of the analysis in the Forest Plan. Multiple-use of the forest resources, including heli-skiing, is an important factor that is considered in the decisions that will be made during Forest Plan revision.

**717. The Wasatch-Cache National Forest should conduct a carrying capacity analysis.**

**717.1 For the entire Wasatch-Cache National Forest**

**717.2 For the Wasatch Front Canyons**

**717.3 For the Tri-Canyons area**

**717.4 For all uses that allow for the protection of the water supply**

**717.5 To decide what activities to restrict or encourage**

**717.6 To limit the number of canyon users**

**717.7 To address use and plan beyond the next 15 years**

**717.8 Include the study in the Forest Plan immediately**

**717.9 Consistent with restoration and sustainability of wildlife, natural, and scenic values**

**717.10 Before new developments are allowed**

**Response:** The WCNF would like to have completed a carrying capacity study for the Tri-canyons area and there are many very good reasons for doing so, but chose not to for several reasons. A carrying capacity study is a very complex process involving many different jurisdictions, partners, landowners, and users on the Forest; is mid-level assessment that is much more complicated than broad-level Forest Plan assessment; takes a large amount of time for the assessment that would take it beyond the time frame for completing the Forest Plan revision; and is not a top priority for the WCNF at this time. A carrying capacity study for the entire WCNF would be more complicated than one for the Tri-canyon area.

**718. The Wasatch-Cache National Forest should establish recreation use data collection points.**

**Response:** The Wasatch-Cache will be conducting National Use Visitor Surveys beginning in October of 2002, which will be carried through until end of September of 2003 and will repeat every 5 years there after.

**718.1 For off-road vehicle users**

**Response:** See above response to concern statement 718.1. Part of the process of Revising the Forest Plan is to review and analysis existing information that pertains to the revision. The knowledge gained from studies such as Off Highway Vehicle Use and Owner Preference in Utah (revised) January 18, 2002, Professional Report IORT PR2001-02 other reports were used in the development of this analysis.

## Education

**719. The Wasatch-Cache National Forest should educate the public.**

**719.1 On how to use and care for the land**

**719.2 About the effects of their activities**

**719.3 On the rules and the trails that are open for their use**

**719.4 On maintaining the 200 foot buffer around riparian areas**

**719.5 On low impact camping ethics**

**719.6 In conjunction with public school systems**

**719.7 Instead of restricting activities**

**Response:** In response to comments received from the public, environmental education is now one of the main objectives of the WCNF in the next planning period. Education has always been an important part of the Forest Service nationally and locally, and it is emphasized in the revised Forest Plan in Chapter 4, Forestwide Direction, Goals and Subgoals.

**720. The final Forest Plan should include specific direction to increase user education.**

**720.1 Through nature education programs**

**721.2 The Wasatch-Cache National Forest should begin an educational campaign to encourage use of quieter motorized recreational vehicles.**

**Response:** See response 719.

## Allow Activities

**722. The Wasatch-Cache National Forest should allow recreational activities for environmental reasons by allowing low impact recreational activities.**

**Response:** Thank you for your comment. Several alternatives respond to the issue of impacts by lowering the amount of impact from activities.

**723. The Wasatch-Cache National Forest should allow recreational activities for social reasons.**

**723.1 To promote family values**

**723.2 To prevent crime**

**723.3 To accommodate the growing population**

**Response:** Thank you for your comments. The WCNF recognizes the values of recreation on the WCNF as shown by the fact that it is one of the main issues raised in the Needs for Change and is a main topic in the FEIS and Forest Plan.

**724. The Wasatch-Cache National Forest should allow recreational activities for economic reasons because of the economic benefit to adjacent communities.**

**Response:** See concern statement 723.1. Economic analysis is contained in the Social and Economic Analysis section in the FEIS.

Do Not Allow/Restrict Activities

**725. The Wasatch-Cache National Forest should control/restrict recreational activities in order to enhance and maintain other goals.**

**Response:** The alternatives in the FEIS display a range of allowed uses in response to issues and concerns raised by the public including the amount of certain types of recreation on the WCNF. We have also addressed these through the recreation opportunity spectrum (ROS) that have a range of recreation opportunities from primitive to urban. See ROS maps for each alternative, and alternative descriptions and allowed activities for allocations in the FEIS.

**726. The Wasatch-Cache National Forest should control/restrict recreational activities for environmental reasons.**

**726.1 To protect the environment**

**726.2 To protect forest health**

**726.3 To protect riparian areas**

**Response:** See concern statement response 725.

**727. The Wasatch-Cache National Forest should control/restrict recreational activities for social reasons because of impacts to quiet and solitude.**

**Response:** See concern statement response 725.

**728. The Wasatch-Cache National Forest should conduct seasonal recreational closures in the Elkhorn Wildlife Management Area to accommodate multiple use while protecting wildlife.**

**Response:** We've done this where we believe it to be appropriate. If you have site-specific concerns these can be addressed during travel management planning.

**729. The final Forest Plan should limit major special permit recreational events to ski area boundaries and require an EIS for permit approval.**

**Response:** Thank you for your comment. We feel that the current language is adequate because it is broad enough to cover most events and that issues you raise such as substantial light and sound pollution should be addressed at the site-specific NEPA analysis. We feel that the level of NEPA analysis should be determined after a specific proposal is brought to the WCNF.

**730. The Wasatch-Cache National Forest should prohibit parking lots, commercial development, campgrounds or vehicle routes along recreational corridors.**

**Response:** Thank you for your comment. The range of alternatives in the FEIS addresses your concern.

**731. The Wasatch-Cache National Forest should consider that "larger scale public facilities" and "modest and unobtrusive marinas" are not compatible with largely primitive and undeveloped shorelines and watersheds.**

**Response:** Thank you for your comment.

**732. The Wasatch-Cache National Forest should favor non-noise, non polluting, and non fossil fuel using recreational activities.**

**Response:** Thank you for your comment. The range of alternatives in the FEIS addresses your concern.

**User Conflict/Monitoring and Enforcement**

**User Conflicts**

**733. The Wasatch-Cache National Forest should address user conflicts.**

**Response:** Thank you for your comment. The range of alternatives in the FEIS addresses your concern. The WCNF is considering many ways to manage user conflicts and travel management it is one of the main objectives in the revised Forest Plan.

**733.1 By considering examples of how other forests have reduced winter recreational conflicts**

**Response:** Thank you for your comment.

**733.2 By protecting forest resources above user groups**

**Response:** Thank you for your comment. One of the main sections that protect forest resources is the standards and guidelines section of the Forest Plan.

**733.3 By segregating users**

**Response:** The range of alternatives in the FEIS addresses your concern by presenting a range of allowable uses on the WCNF.

**733.4 By separating hiking trails from all other users**

**Response:** See response 733.3.

**733.5 By separating foot and horse travel, motorized recreation, and research**

**Response:** See response 733.3.

**733.6 By implementing a variety of solutions to user conflicts before closing an area**

**Response:** Thank you for the information. We feel this type of information you provided could be used as one of many tools for resolving recreation conflicts. However, we do not plan to add your recommendation to the revised Forest Plan because the WCNF does not want to have only one method in which recreation conflicts would be assessed.

**733.7 In the winter**

**Response:** Thank you for your comment.

**734. The Wasatch-Cache National Forest should set aside a 1000-2000 acre preserve for summer and winter motorized recreation.**

**Response:** Thank you for your comment.

**735. The Wasatch-Cache National Forest should not segregate users because everyone should have equal opportunity to use public lands.**

**Response:** Thank you for your comment. The WCNF recognizes that there are conflicts between users and the Forest will try to make the best decision it can given the many view points of the users.

**736. The Wasatch-Cache National Forest should recognize that the plan does little to resolve user conflict and current Draft EIS designations are likely to increase them.**

**Response:** Thank you for your comment.

#### Monitoring and Enforcement

**737. The Wasatch-Cache National Forest should monitor motorized recreation and enforce regulations.**

**Response:** The WCNF are conducting visitor use surveys and uses studies such as noted in Comment 718.1. The WCNF enforces regulations according to the law.

**737.1 According to executive orders and the National Forest Management Act**

**Response:** Recent studies that evaluate motorized use in northern Utah have been used in the Recreation effects section of the FEIS.

**737.2 For multiple reasons**

**Response:** Thank you for your comment. The range of alternatives in the FEIS addresses your concern by presenting a range of allowable uses on the WCNF.

**737.3 To prevent environmental damage**

**Response:** Thank you for your comment. See response 733.

**737.4 To prevent ghost roads**

**Response:** Thank you for your comment.

**737.5 For both winter and summer recreation**

**Response:** Thank you for your comment.

**737.6 Don't let a few spoil it for the rest**

**Response:** Thank you for your comment.

**737.7 Because opening more areas to motorized vehicles will only increase the problem**

**Response:** Thank you for your comment. See response 733.

**737.8 Instead of restricting motorized activities**

**Response:** Thank you for your comment. See response 733.

**738. The Wasatch-Cache National Forest should monitor motorized recreation and enforce regulations in certain areas.**

**738.1 In wilderness and roadless areas**

**738.2 Restrict access adjacent to wilderness**

**738.3 Enforce Mount Naomi Wilderness Area boundaries**

**738.4 In Green Canyon**

**738.5 Northern Central Bear River Range**

**738.6 East Slopes of Mount Naomi Wilderness**

**738.7 Temple Fork area**

**Response:** Monitoring for motorized recreation and enforcement of regulations are addressed in several areas of the Forest Plan. The Objective for Education and Enforcement in the revised Forest Plan intends to integrate key messages that teach appropriate behavior while using the forest. The focus areas for key messages include OHV use with a purpose of reducing conflicts between recreation users. One of the items in the revised Forest Plan monitoring plan is monitoring to determine if the WCNF is delivering key education/enforcement messages that include OHV use. It also has monitoring to determine whether the WCNF is providing recreational opportunities for both motorized and nonmotorized users while protecting and restoring watersheds, providing for the needs of wildlife. The monitoring section identifies indicators and how to measure the monitoring items that includes the use of surveys. When surveys are set up for monitoring, specific areas will be identified and the areas described in Comments 738.1 through 738.7 will be considered at that time.

**739. The Wasatch-Cache National Forest should monitor and enforce snowmobile regulations.**

**739.1 On public lands**

**739.2 In Cardiff Fork**

**739.3 West of Tony Grove**

**739.4 Issue citations to violators**

**Response:** See response 738. When surveys are set up for monitoring, specific areas will be identified and considered at that time. Forest law enforcement officers have the authority to issue citations when people violate the law. This is one of the methods the WCNF uses to assist in compliance with the law.

**740. The Wasatch-Cache National Forest should have personnel on the Big Water Trail on the no-bike days to monitor illegal use.**

**Response:** Thank you for your comment. The Objective for Education and Enforcement in the revised Forest Plan intends to address this type of problem. Your comment will be sent to the Ranger District and means to address it will be considered.



**741. The Wasatch-Cache National Forest should patrol, monitor, and educate dispersed campers**

**741.1 In the area south of Highway 89 to Temple Fork**

**741.2 And minimize inappropriate off-road travel and ghost roads**

**Response:** Thank you for your comment. The Objective for Education and Enforcement in the revised Forest Plan intends to address this type of problem. When surveys are set up for monitoring and plans developed for patrolling and education, specific areas will be identified and considered at that time.

**742. The Wasatch-Cache National Forest should enforce the Forest Plan by using more signs.**

**Response:** Thank you for your comment. The Objective for Education and Enforcement in the revised Forest Plan intends to address this type of problem. Signing is one of the methods by which to meet this objective.

**743. The Wasatch-Cache National Forest should increase enforcement of motorized travel rules rather than build new logging roads and motorized trails.**

**Response:** Thank you for your comment. The WCNF considers how to allocate funds to meet the needs of the forest.

**744. The Wasatch-Cache National Forest should add a monitoring method for reducing user conflicts.**

**Response:** The revised Forest Plan has included monitoring to address user conflicts such as the monitoring item that determines whether the WCNF is providing recreational opportunities for both motorized and nonmotorized users while protecting and restoring watersheds, providing for the needs of wildlife.

**745. The Wasatch-Cache National Forest should add a monitoring method for stewardship education efforts.**

**Response:** Monitoring to address this objective is included in the monitoring plan of the revised Forest Plan.

**746. The Wasatch-Cache National Forest should not assume non-compliance increases with increased user numbers. Some problems can be mitigated.**

**Response:** We have seen many more user created ATV trails in just the last couple of years and that has happened at the same time as a large increase in numbers of ATV users. An objective of the revised Forest Plan is to provide recreational opportunities for both motorized and nonmotorized users while protecting and restoring watersheds, providing for the needs of wildlife.

**747. The final Forest Plan should not increase its enforcement problems by closing additional areas to recreational users.**

**Response:** Enforcement and signing are ways to implement the Forest Plan. The Forest Plan has an objective of providing recreational opportunities for both motorized and nonmotorized users while protecting and restoring watersheds,

providing for the needs of wildlife. The alternatives give a range of allowed activities that have varying amounts of area closed to certain activities.

#### User Regulations

- 748. The Wasatch-Cache National Forest should require off-road vehicles to have license plates that are readable.**

**748.1 In conjunction with the state of Utah**

**748.2 To facilitate identification of rule violators**

**Response:** Thank you for your comment on ways to help implement the Forest Plan. Comments such as yours will be considered when the WCNF considers specific ways to assist users in complying with Travel Plans.

- 749. The Wasatch-Cache National Forest should impose strict noise standards and speed limits.**

**Response:** The FEIS addresses the issue of noise by separating the motorized and non-motorized uses. Travel planning is the time when these issues should be addressed because the large variation across the WCNF makes it not appropriate to address at the Forest Plan scale.

- 750. The Wasatch-Cache National Forest should impose a 5 mph speed limit near campgrounds to minimize dust.**

**Response:** Thank you for your comment. A Forest-wide goal is for a roads and Trails system that is safe, responsive to public and agency needs.

- 751. The Wasatch-Cache National Forest should impose noise and clean engine restriction,s rather than close areas to motorized recreation.**

**Response:** Thank you for your comment. In the section Effects of Recreation on Recreation under Topic Recreation /Scenic Management in the FEIS, the WCNF recognizes that new technology is available to make snowmobiles quieter and cleaner. This will be considered along with many factors when the decision is made.

- 752. The Wasatch-Cache National Forest should impose temporary or permanent closure of access to areas that result in frequent motorized trespassing.**

**Response:** The WCNF recognizes this issue and addresses it with goals to increase Forest Service field presence in key areas, improve effectiveness of public information on restrictions, and increase participation of individuals and organized groups in monitoring uses in the Forest Plan Forestwide Subgoal- Road/Trail and Access Management and Forestwide Goal 8– Enforcement.

## Motorized Recreation

### Motorized Recreation General

- 753. The Wasatch-Cache National Forest should provide more information about motorized recreation opportunities to comply with the requirements of environmental justice.**

**Response:** Information concerning motorized recreation opportunities are found on the ROS maps per each alternative and discussed in the FEIS, chapter 3, Topic 4- Recreation/Scenery Management.

- 754. The Final EIS should address compliance with P.L. 105-359 to improve outdoor recreational access for the disabled.**

**Response:** This is National direction and the Forest is working to comply with the direction. See Revised Forest Plan, Chapter 4, Recreation, Desire Condition.

### Cumulative Impacts on Motorized Recreationists

- 755. The Wasatch-Cache National Forest should evaluate the cumulative impact of the proposed action and other decisions on environmental justice and the standards of living for multiple-use and motorized visitors.**

**Response:** See response 753.

- 756. The Wasatch-Cache National Forest should evaluate the social and economic impact to motorized recreationists of not having recreational opportunities in the nearby forests.**

**Response:** See response 753.

- 757. The Wasatch-Cache National Forest should evaluate the cumulative impacts and environmental justice issues surrounding the lack of national motorized trails on motorized recreationists. And then, identify and implement measures necessary to mitigate these impacts on motorized recreationists.**

**Response:** See response 753.

- 758. The Wasatch-Cache National Forest should determine the number of miles of off-road vehicle trails versus the miles of trails and acres of cross-country travel opportunities to address the cumulative effects on motorized recreationists.**

**Response:** This information on the numbers of roads on the Forest is displayed in the affected environment under Topic 3 - Roads and Access management and trails under Topic 4 – Recreation /Scenery Management. There currently are no cross-country travel opportunities since all of the District travel plans allow summer motorized use only on designated roads and trails. Motorized cumulative effects is addressed in the Cumulative Effects section under Topic 4 – Recreation /Scenery Management.

- 759. The Wasatch-Cache National Forest should consider the U.S. Department Of Transportation document, “Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice.” because it is an excellent resource on user conflict and trail sharing.**

**Response:** Thank you for this internet reference site.

#### Allow Motorized Recreation

- 760. The Wasatch-Cache National Forest should allow motorized use.**

**760.1 In roadless areas**

**760.2 Except in areas where it interferes with wildlife**

**760.3 For tourism**

**760.4 Because motorized use is a legitimate activity**

**Response:** The WCNF allows motorized use in many areas and the various alternatives provide a range of motorized vehicle use that may be considered by the decision maker.

- 761. The Wasatch-Cache National Forest should not close roads and trails to motorized use for environmental reasons because motorized users don’t harm the environment.**

**Response:** The WCNF must consider the effects of roads and trails based on significant issues that are raised, including environmental issues. Most road closures are a result of site-specific analysis and during Travel Plan updates at which time specific information is reviewed to make a determination on whether to close or not close a road.

- 762. The Wasatch-Cache National Forest should not eliminate access based on premature decisions about lynx, bear, and wolves. The Canada Lynx should not be used as an excuse to stop motorized use.**

**Response:** See response 753.

- 763. The Wasatch-Cache National Forest should open a new motorized route for every route closed to avoid further cumulative impacts to motorized recreationists.**

**Response:** The WCNF considers issues and effects of roads and trails on resources and the public when it evaluates whether to close or not close a road. Using criteria such as a new motorized route should be opened for every closed route does not provide a good process for evaluating issues related to access management.

#### Do Not Allow/Restrict Motorized Recreation

- 764. The Wasatch-Cache National Forest should prohibit/restrict motorized recreation.**

**764.1 In roadless areas**

**764.2 In sensitive areas**

**764.3 In riparian areas**

**764.4 In the backcountry**

**764.5 Because it affects non-motorized users' quality of experience**

**764.6 Because it will be harder to restrict uses in the future**

**764.7 Because there are many opportunities elsewhere in Utah**

**764.8 For anything but emergency use**

**764.9 Don't support the use of petroleum products**

**Response:** Thank you for your comments. The FEIS address these concerns in the various alternatives, particularly Alternatives 1 and 2, and the effects are analyzed in the section on Environmental Effects of Recreation on Recreation in Topic 4 – Recreation /Scenery Management.

**765. The Wasatch-Cache National Forest should proscribe future motorized uses in roadless areas where there are no motorized uses now.**

**Response:** Thank you for your comments. The FEIS address these concerns in the various alternatives, particularly Alternatives 4 and 5, and the effects are analyzed in the section on Environmental Effects of Recreation on Recreation in Topic 4 – Recreation /Scenery Management.

**766. The Wasatch-Cache National Forest should close large blocks of land around roadless and wilderness areas and entire watersheds to protect the environment from motorized users.**

**Response:** The FEIS address these concerns in Alternative 1 by prescribing large areas of the WCNF for ensuring biodiversity and species viability including watershed functions.

**767. The Wasatch-Cache National Forest should not allow motorized use right up to wilderness boundaries to meet the National Strategic goal.**

**Response:** Thank you for your comment and reference to the USFS National Strategic Goals. Section 303 of The Utah Wilderness Act of 1984 (Public Law 98-428) prohibits buffer zones around designated wilderness areas in the State of Utah. It states that “ The fact that nonwilderness 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.” The WCNF abides by this law when managing areas adjacent to wilderness areas in the State of Utah.

**768. The Wasatch-Cache National Forest should limit motorized zones to areas where natural features make cross-country travel impossible.**

**Response:** Thank you for your comment. During travel planning analysis, characteristics of the landscape such as steepness are considered for where motorized travel is allowed. Currently, there are no cross-country travel opportunities since all of the District travel plans allow summer motorized use only on designated roads and trails. The alternatives of the FEIS have a range of areas where motorized use is allowed that is based on issues that were raised during the Forest Plan revision.

## **Motorized Recreation – Off-Road Vehicles**

### **Motorized Recreation – Off-Road Vehicles General**

**769. The Wasatch-Cache National Forest should consider off-road vehicles and motorcycles separately.**

**Response:** The FEIS and revised Forest Plan revision places motorcycles and ATVs in the same category of vehicles because planning is at a broad scale. Separating these vehicle types would be appropriate for site-specific analysis during District travel planning.

**770. The Wasatch-Cache National Forest should manage off-road vehicles.**

**770.1 By developing comprehensive management strategies**

**770.2 According to the Motorcycle Industry Council triangle of education-opportunity-law enforcement**

**Response:** The FEIS and revised Forest Plan recognizes the issue of managing off-road vehicles in section Road/Trail and Access Management under Forestwide Subgoals, and in sections Objectives for Education and Enforcement and Objectives for OHV and Non-motorized Travel Management under Forest-wide Objectives of the revised Forest Plan. The revised Forest Plan sets the goals and objectives of developing a plan for addressing these issues but does not develop the specific strategies to accomplish it.

**771. The Wasatch-Cache National Forest should develop a travel plan for summer motorized vehicles to prevent resource damage.**

**Response:** Travel plans have been completed recently for Kamas RD, Salt Lake RD, Ogden and Logan RD and the Evanston/Mt. View RD will have a revised travel plan very soon. Also, See response 770.

**772. The Wasatch-Cache National Forest should that consider more resources are needed to manage motorized recreation because of environmental impacts on the Logan Ranger District.**

**Response:** See response 770.

**773. The Wasatch-Cache National Forest should conduct public outreach with motorized recreationists to fairly present their needs.**

**Response:** The WCNF has provided public participation throughout the Forest Plan revision process. Many of the people who attended public meetings and who gave many comments are motorized recreationists. Through our public participation efforts we feel we have given more than adequate ability to express opinions and comments on how to manage the WCNF.

**774. The Wasatch-Cache National Forest should manage off-road vehicle use rather than close areas because motorized users will ignore closures.**

**Response:** See response 770.

## Adequacy of Analysis

**775. The Wasatch-Cache National Forest should conduct a National Environmental Policy Act analysis for any off-road vehicle use.**

**Response:** The WCNF is required to conduct a NEPA analysis on all proposed projects. District travel plans provide the site-specific NEPA analysis for where OHV use is allowed on the WCNF.

## Education

**776. The Wasatch-Cache National Forest should alter the Preferred Alternative to include more management and education pertaining to off-road vehicle in the forest.**

**Response:** Thank you for your comment. As a result of comments such as yours, the WCNF has developed goals and objectives that focus on education and enforcement of OHV use. See response 770.

**777. The Wasatch-Cache National Forest should require all off-road vehicle riders to take a course for a permit to ride on the forest.**

**Response:** The State of Utah has training courses for operators of OHVs. We feel that it is best that the State of Utah and not the USFS be responsible for OHV training and certification.

## Allow Off-Road Vehicles

**778. The Wasatch-Cache National Forest should allow off-road vehicles.**

**778.1 For multiple use**

**778.2 Because the majority of the public supports it**

**778.3 Because off-road vehicle use is increasing**

**778.4 Do not make it an illegal activity**

**Response:** The FEIS addresses the issue of OHV use in the section Effects of recreation on Recreation under Topic 4 – Recreation / Scenery Management. The alternatives provide a range of allowed uses by OHVs and the decision will consider those concerns that you have expressed. Also see response 770.

**779. The Wasatch-Cache National Forest should allow off-road vehicles for environmental reasons.**

**779.1 Because all terrain vehicles are environmentally safe and do not impact the scenery**

**779.2 To protect wetlands**

**779.3 Do not use sound level to justify motorized closures**

**779.4 Because motorized users don't harm the environment**

**779.5 Because only those who cause damage should be punished**

**779.6 Because education of motorized users is working**

**779.7 Because motorized access leads to higher public appreciation of nature**

**Response:** See response 778.

**780. The Wasatch-Cache National Forest should allow off-road vehicles for economic reasons. This should be allow in areas where jobs have been lost.**

**Response:** The FEIS recognizes the contribution of OHV use to the economy in the Social and Economic Analysis.

**781. The Wasatch-Cache National Forest should allow off-road vehicles for social reasons.**

**781.1 For families**

**781.2 For the disabled and elderly**

**781.3 For future generations**

**781.4 For safety or emergency use**

**781.5 For intrinsic values**

**Response:** Thank you for your comment. The FEIS recognizes that OHV use is important to many people for many reasons in the recreation issues, alternatives, and effects section Effects on Recreation from Recreation under Topic 4 Recreation/Scenery Management.

**782. The Wasatch-Cache National Forest should allow off-road vehicles in certain areas.**

**782.1 In roadless areas**

**782.2 In remote and primitive areas where some degree of challenge is found**

**Response:** The alternatives in the FEIS contain a range of areas where summer motorized recreation is allowed, including alternative with prohibition in roadless areas. The revised Forest Plan contains an objective for OHV management that includes the need to update Travel plans on some Districts and to provide opportunities for OHV use such as loop trails and adequate amount of trails.

**783. The Wasatch-Cache National Forest should allow off-road vehicles by maintaining access.**

**783.1 By keeping areas open**

**783.2 By keeping the current level of motorized access**

**783.3 By opening more trails to motorized users**

**783.4 By increasing the acreage open to motorized use**

**783.5 By providing equal opportunity for motorized and non-motorized uses**

**783.6 By developing logging and pioneer roads for all off-road vehicles**

**783.7 By expanding public areas for play areas and trials bikes**

**Response:** Thank you for your comment. The alternatives in the FEIS contain a range of areas where summer motorized recreation is allowed. This range was developed in response to issues raised about the management of the WCNF. Also See responses 781 and 782.1.

Do Not Allow/Restrict Off-Road Vehicles

**784. The Wasatch-Cache National Forest should prohibit/restrict off-road vehicles for environmental reasons.**

**784.1 To protect remote areas**



**784.2 To protect watersheds**

**784.3 To prevent erosion-prone user-created trails**

**784.4 Because of the cumulative impact as a result of the exponential increase in numbers of motorized users**

**784.5 Because opening more areas will increase degradation**

**784.6 Because users often inflict more damage over a larger area**

**784.7 Because of noise and air pollution**

**784.8 Because of disturbance to nesting birds**

**784.9 Because of impacts to the reproductive success of birds**

**Response:** The FEIS recognizes that many people for various reasons feel that OHV use should be prohibited or restricted in the section Effects on Recreation from Recreation under Topic 4 Recreation/Scenery Management and in Effects on Soil and Water Resources from Recreation under Topic 1 Watershed Health. The FEIS recognizes that motorized use effects wildlife as described in section Effects on Terrestrial Wildlife from Recreation under Topic 2 –Biodiversity and Viability.

**785. The Wasatch-Cache National Forest should prohibit/restrict off-road vehicles for social reasons because many elderly people like non-motorized activities.**

**Response:** See response 784.

**786. The Wasatch-Cache National Forest should control off-road vehicles through restrictions.**

**786.1 By seasonal restrictions**

**786.2 By controlling use during the spring runoff**

**786.3 By restricting to existing paved roads and non-paved roads that currently have significant use**

**786.4 By closing/restricting areas until it can be demonstrated that there is no environmental impact**

**786.5 By temporarily closing access to areas experiencing use by vehicles off of designated routes until further analysis**

**786.6 By either requiring off road vehicles to conform to pollution regulations or keeping them out of canyons**

**786.7 By adding a standard to prohibit off-road and off-trail cross country travel**

**786.8 By having a trail policy of closed unless posted open**

**786.9 By limiting group size to six to eight**

**786.10 By prohibiting vehicles on dirt roads in the Cottonwood Canyons, except for property owners**

**Response:** There currently are no summer motorized cross-country travel opportunities since all of the District travel plans allow summer motorized use only on designated roads and trails. The revised Forest Plan has a standard for “summer motorized and mechanized access is managed on an open on designated routes”, under Standards for Road/Trail and Access Management. Travel Plans also have information on proper OHV use in the Tread Lightly section. Other travel management issues should be resolved at the site-specific Travel Plan analysis because specific information needs to be analyzed such as access requirements

through public land, ski area management needs, and access to campgrounds. See also response 770.

- 787. The Wasatch-Cache National Forest should not expand public areas for activities like rock crawls and trials because it can damage the visual environment.**

**Response:** See response 786

### **Motorized Recreation – Snowmobiles**

Motorized Recreation – Snowmobiles General.

- 788. The Wasatch-Cache National Forest should develop a designation other than roadless for the type of terrain snowmobilers use because snowmobiles don't use roads.**

**Response:** Roadless is inventory not a designation of any type of use. The Forest uses the designation winter motorized for terrain that snowmobilers use.

- 789. The Wasatch-Cache National Forest should change Guideline G47 to a Standard and increase the snow depth required for winter motorized use.**

**Response:** Currently, scientific studies are limited on the effects of compacted snow due to snowmobiling. These studies have shown there can be some effects. Whether or not these effects are significant has not been clearly established. The Guideline referring to snow depth is G54. This will remain a Guideline and the depth will remain the same.

- 790. The Wasatch-Cache National Forest should eliminate bias in the proposed Forest Plan toward motorized recreation.**

**Response:** The Forest Plan and accompanying EIS cover a broad range of alternatives. For example alternatives 1 & 2 significantly reduce the amount of roads and terrain open to motorized recreation. Alternative 3 expands the amount of roads and terrain open to motorized recreation.

### **Adequacy of Analysis**

- 791. The Wasatch-Cache National Forest should address the potential environmental impacts of having massive areas of compacted snow due to snowmobile use.**

**Response:** Currently, scientific studies are limited on the effects of compacted snow due to snowmobiling. These limited studies have shown there can be some effects. Whether or not these effects are significant relative to normal snow compaction has not been clearly established.

- 792. The Wasatch-Cache National Forest should re-evaluate whether snowmobile use should be allowed when snow cover is less than or equal to 12 inches because of environmental impacts.**

**Response:** Currently, scientific studies are limited on the effects of compacted snow due to snowmobiling. These limited studies have shown there can be some effects. Whether or not these effects are significant relative to normal snow compaction has not been clearly established. When new, relevant scientific evidence indicating adverse effects, the depth and impacts will be re-evaluated.

**793. The Wasatch-Cache National Forest should incorporate new data into travel management planning about the effects of 2-stroke engines on the environment.**

**Response:** Current data has been incorporated in the analysis for the Forest Plan and EIS. At such time as new data becomes available it will be looked at and analyzed.

**794. The Wasatch-Cache National Forest should evaluate the potential for snowmobile pollution, especially evaluate the impacts of pollution to watersheds.**

**Response:** This topic is discussed in Section 3 under Environmental Consequences in the Final EIS.

**795. The Final EIS should include an analysis of the effects of snowmobiling on air quality, watersheds, and wildlife habitat.**

**Response:** This topic is discussed in Section 3 under Environmental Consequences “Effects on air Quality from Snowmobiles.”

**796. The Wasatch-Cache National Forest should adequately evaluate the impact of snowmobiling in the Lakes backcountry.**

**Response:** This topic was adequately discussed in Topic 3 Roads Access Management and Topic 4 Recreation and Scenery Management in the Final EIS.

**797. The Wasatch-Cache National Forest should determine the limits of snowmobile use due to impacts on wintering wildlife.**

**Response:** The Forest continues to monitor winter motorize use areas. These areas are mapped in the Final EIS as well as in the Revised Forest Plan. Please refer to these maps for determining the limits of snowmobile use on the Forest. Winter motorized use and wildlife winter ranges have been looked at relative to each other and adjustments to terrain available for motorized use were made.

Allow Snowmobiles

**798. The Wasatch-Cache National Forest should allow snowmobiles.**

**Response:** The Wasatch-Cache National Forest will continue to provide a wide range of recreational opportunities both winter motorized and winter non-motorized use through management prescription allocations. Mapping of Winter Motorized use terrain is displayed in winter recreation mapping in the Revised Forest Plan.

**798.1 By preserving the level of snowmobiling opportunity that exists today.**

**Response:** Alternatives 3 and 5 in the Wasatch-Cache Final EIS increase the amount of snowmobiling opportunity available in the Forest EIS, alternative 4 keeps the level of snowmobiling opportunity the same while Alternative 6 does not allow snowmobile use in recommended wilderness. Alternative 7 in the EIS allows snowmobile use in recommended wilderness.

**798.2 By providing specific areas for snowmobilers and parking.**

**Response:** The Forest does provide areas for snowmobilers and non-snowmobilers alike. Please Refer to Topic 4 Recreation Management in the Final EIS for a discussion of this issue. In addition, refer to winter recreation maps in the Revised Forest Plan.

**798.3 If the final plan recommends additional wilderness.**

**Response:** The current plan will allow winter motorized use to continue in newly proposed Wilderness in areas where it was allowed previously before the proposed Wilderness management prescription.

**799. The Wasatch-Cache National Forest should allow snowmobiles for environmental reasons.**

**799.1 Because snowmobiles do not cause any environmental damage.**

**799.2 Because the Draft EIS has not proven any measurable impact or conflicts.**

**799.3 Because snowmobiles do not harm wildlife.**

**Response:** The Forest will continue to allow snowmobiles in areas designated for winter-motorized use. Please refer to the winter recreation maps in the Revised Forest Plan showing areas open to winter motorized use. **See also response 798.**

**800. The Wasatch-Cache National Forest should allow snowmobiles for social reasons because they are needed for search and rescue.**

**Response:** Please refer to Topic 4 Recreation and Scenery Management in the Final Environmental Impact Statement and look at table REC-12 for the amount of acres open to snowmobiling by alternatives.

**801. The Wasatch-Cache National Forest should allow snowmobiles for economic reasons because snowmobilers contribute to the economy and money for trail grooming.**

**Response:** The Forest will continue to allow snowmobiling. The economic effects of snowmobiling are discussed in Appendix B11 of the Final Environmental Impact statement. Please refer to the Social and Economics Section of the FEIS for a discussion of the economic effects of snowmobiling on local economies.

**802. The Wasatch-Cache National Forest should allow snowmobiles in certain areas.**

**Response:** See response 798

**802.1 In inventoried roadless areas.**

**Response:** The Forest Plan and FEIS cover a broad range of alternatives. Some alternatives increase the amount of winter motorized acreage such as Alternatives 3 & 5 and some alternatives decrease the amount of acreage available for winter motorized use such as in alternatives 1 & 2. Alternative 6 does not allow snowmobiling in recommended Wilderness. Alternative 7, the preferred alternative, allows snowmobiles in recommended Wilderness. The final decision will try to balance an appropriate mix of winter motorized and winter non-motorized terrain.

**802.2 In all currently open areas.**

**Response:** The Forest Plan and FEIS cover a broad range of alternatives. Some alternatives increase the amount of winter motorized acreage and some alternatives decrease the amount of acreage available for winter-motorized use. The final decision will try to a balance an appropriate mix of winter motorized and winter non-motorized terrain.

**802.3 Re-open winter non-motorized areas on the Uinta's North Slope.**

**Response:** See response 802.

**802.4 Open semi-primitive non-motorized areas to snowmobile use seasonally.**

**Response:** Areas with a Semi-primitive Non-Motorized ROS Classification will remain closed to motorized use.

**802.5 In the Bunchgrass area east of Tony Grove Lake and the area east of Swan Peak and south of Swan Lake.**

**Response:** The Forest Plan and FEIS cover a broad range of alternatives. Some alternatives increase the amount of winter motorized acreage and some alternatives decrease the amount of acreage available for winter-motorized use. Alternatives 3, 5 & 6 allow snowmobiling in this area.

**802.6 In Garden City Canyon.**

**Response:** The Forest Plan and FEIS cover a broad range of alternatives. Some alternatives increase the amount of winter motorized acreage and some alternatives decrease the amount of acreage available for winter-motorized use. Alternatives 3, 5 & 6 allow winter motorize use in the Garden City Canyon area.

**803. The Wasatch-Cache National Forest should not reduce winter motorized acreage because user numbers are increasing.**

**Response:** The Forest Plan and FEIS cover a broad range of alternatives. Some alternative increase the amount of winter motorized acreage and some alternatives decrease the amount of acreage available for winter motorized use. Alternatives 3 & 5 increase the number of acres available for winter motorized use. Alternative 7, the preferred alternative, allows snowmobile use in recommended Wilderness.

**804. The Wasatch-Cache National Forest should not restrict winter motorized use because of economic impacts.**

**Response:** Snowmobile use, along with many other recreational uses, is and will continue to be an allowed form of recreation on the Wasatch-Cache National Forest. The Wasatch-Cache National Forest will continue to provide a wide range of recreational opportunities both winter motorized and winter non-motorized use through management prescription allocations, Recreational Opportunity Spectrum (ROS) Classification, and subsequent winter recreation management.

**805. The Wasatch-Cache National Forest should not restrict snowmobiles based on the application of the Canadian Lynx Conservation Assessment, until conclusive studies have been completed within the appropriate lynx analysis units.**

**Response:** The Endangered Species Act directs all government agencies to protect species listed as threatened and endangered. This includes habitat. Eleven counties in Northern Utah are included as lynx habitat by the US Fish and Wildlife Service (FWS) The Forest will work closely with the FWS on all mitigation requirements outlined for this species.

**806. The Wasatch-Cache National Forest should allow continued winter access to a variety of locations by snowmobile, helicopter and snow cat for the purpose of monitoring snowpack conditions and forecasting snow runoff.**

**Response:** The Revised Forest Plan will continue to allow access for the purpose of monitoring snowpack conditions for forecasting snow runoff.

Do Not Allow/Restrict Snowmobiles.

**807. The Wasatch-Cache National Forest should prohibit/restrict snowmobile use. Completely ban all winter motorized vehicles until resources for policing the areas can be increased.**

**Response:** Snowmobile use, along with many other recreational uses, is and will continue to be an allowed form of recreation on the Wasatch-Cache National Forest. The Wasatch-Cache National Forest will continue to provide a wide range of recreational opportunities both winter motorized and winter non-motorized use through management prescription allocations, Recreational Opportunity Spectrum (ROS) Classification, and subsequent winter recreation maps. The Forest will continue to enforce applicable laws and regulations for winter-motorized use to the level allowed by current budgets and personnel available for enforcement tasks.

**808. The Wasatch-Cache National Forest should prohibit/restrict snowmobile use for environmental reasons.**

**808.1 Because of off-road snowmobiling impacts.**

**808.2 Because of noise and air pollution.**

**808.3 Because of impacts to wildlife.**

**808.4 Because of impacts to threatened, endangered, and sensitive species.**

**Response:** This topic was discussed in several areas including Chapter 3-Affected Environment, Forest-wide recreation and Environmental Consequences under Topic 2- Biodiversity and Viability.

**809. The Wasatch-Cache National Forest should prohibit/restrict snowmobile use for social reasons.**

**809.1 Because it impacts social values.**

**809.2 Because it caters to the wealthy.**

**Response:** Snowmobile use, along with many other recreational uses, is and will continue to be an allowed form of recreation on the Wasatch-Cache National Forest. The Wasatch-Cache National Forest will continue to provide a wide range of recreational opportunities both winter motorized and winter non-motorized use through management prescription allocations, Recreational Opportunity Spectrum (ROS) Classification, and subsequent winter recreation maps. The Forest will continue to enforce applicable laws and regulations for winter-motorized use to the level allowed by current budgets and personnel available for enforcement tasks. The FEIS examines a range of Alternatives for separation of winter motorized and non-motorized uses.

**810. The Wasatch-Cache National Forest should prohibit/restrict snowmobile use in certain areas.**

**810.1 In roadless areas**

**810.2 In the Lily Lake Cross-country Ski Area expansion**

**810.3 On the east slopes of Mount Naomi.**

**Response:** All of the Alternatives in the Final EIS restrict snowmobiles to certain areas to a great extent. Alternatives 1, 2 & 6 in the Wasatch-Cache Final EIS significantly restrict winter motorized use in specific areas across the forest. Alternative 1 restricts winter motorized use in roadless areas. Alternatives 1 & 2 in the Wasatch-Cache Final EIS restricts use in the Lily Lake Cross-country Ski Area. Alternatives 1, 6 and 7 in the Wasatch-Cache Final EIS restricts use on the east slopes of Mount Naomi.

**811. The Wasatch-Cache National Forest should control snowmobiles through restrictions.**

**Response:** There are restrictions on winter motorized use on the Forest.

**811.1 Restrict to currently open areas.**

**Response:** Alternative 4 in the Wasatch-Cache Final EIS leaves winter motorized use the same.

**811.2 Don't open new areas**

Alternative 4 in the Wasatch-Cache Final EIS leaves winter motorized use the same.

**811.3 Broaden Guideline 34 to allow more flexibility for imposing winter recreational closures.**

**Response:** Guideline 34 was changed to Guideline 39 in the Revised Forest Plan and has remained the same.

**811.4 Impose seasonal restrictions.**

**Response:** Winter motorized use is controlled through winter recreation management described in the Revised Forest Plan under Forestwide Allocations-Winter Recreation. Winter recreation management begins when there is 12 inches of snow present on the ground.

**811.5 Close areas with potential lynx habitat to winter motorized use.**

**Response:** The Endangered Species Act directs all government agencies to protect species listed as threatened and endangered. This includes habitat. Eleven counties in Northern Utah are included as lynx habitat by the US Fish and Wildlife Service (FWS). The Forest will work closely with the FWS on all mitigation requirements outlined for this species.

**811.6 Regulate user numbers**

**Response:** Regulating users is one tool to regulate use. The Forest will continue to manage winter motorized use through standards and guidelines, management area prescriptions, ROS and winter recreation management strategies. Please refer to Chapter 4 of the Revised Forest Plan under Forest Wide Allocations and in Management Area Prescriptions for a description on how Winter Motorized use will be managed.

**812. The Wasatch-Cache National Forest should not issue a special use permit to snowmobilers in Cardiff Fork to access mining claims because snowmobiles are not using these permits legitimately.**

**Response:** The Forest Service is required to provide “reasonable” access to a person owning private land surrounded by National Forest. Special Use Permits (SUP) are issued to the private landowner allowing them to cross National Forest so that they are able to access their private land. The Forest Service needs to continue to make sure all persons who are allowed to access their private land through a SUP are complying with the terms and conditions set out in that SUP. Several courses of action are available to the SUP administrator if the SUP holder is violating the terms of the SUP.

**Motorized Recreation – Heli-skiing**

**Motorized Recreation – Heli-skiing General**

**813. The Wasatch-Cache National Forest should use the description from the Forest Plan to define the area of permitted heli-ski terrain to be exchanged.**

**Response:** The terrain where helicopter skiing is allowed is well described in the Special Use Permit allowing this activity to occur. In addition, helicopter ski terrain



is well described by alternative in the Final EIS and in the Revised Forest Plan Winter Recreation Maps. Please refer to the September 1999 Environmental Impact Statement completed for the helicopter skiing permit renewal.

Adequacy of Analysis.

**814. The Wasatch-Cache National Forest should explain the issue of eliminating recreational helicopter activities to allow eagles to effectively reproduce in the Tri-Canyons.**

**Response:** A thorough analysis was completed on the effects of helicopter skiing on nesting raptors in the September 1999 Environmental Impact Statement on Wasatch Powderbird Guides helicopter skiing permit renewal.

Allow Heli-skiing.

**815. The Wasatch-Cache National Forest should allow heli-skiing because it is good for everyone.**

**815.1 Because eliminating this activity is in contrast to stated forest goals.**

**815.2 For multiple use.**

**815.3 Since the cumulative impacts of the EIS and the Special Use Permit (SUP) may have already placed the future of this activity in jeopardy.**

**815.4 By allowing heli-skiing on Sunday and Monday.**

**Response:** This issue was thoroughly analyzed in the September 1999 Environmental Impact Statement completed for the helicopter skiing permit renewal. Wasatch-Powderbird Guides will continue to operate under the terms and condition of their 5-year Outfitter and Guide SUP.

**816. The Wasatch-Cache National Forest should allow heli-skiing for environmental reasons because it does not harm the environment because noise is a minimal impact.**

**Response:** See response 815.

**817. The Wasatch-Cache National Forest should allow heli-skiing for social reasons.**

**817.1 For safety.**

**817.2 For the disabled.**

**Response:** See response 815.

**818 The Wasatch-Cache National Forest should allow heli-skiing for economic reasons because of its impact to the economy.**

**Response:** See response 815.

**819. The Wasatch-Cache National Forest should allow heli-skiing in certain areas.**

**819.1 In wilderness areas.**

**Response:** The Wilderness Act prohibits motorized use in Wilderness areas.

**819.2 In the Cascade area.**

**Response:** The Uinta NF allows heli-skiing in the Cascade Ridge area.

**819.3 In Mill Creek Canyon.**

**Response:** Helicopter skiing is allowed in the Gobblers Knob area of Millcreek Canyon.

**820. The Wasatch-Cache National Forest should allow Wasatch Powderbird Guides heli-skiing use.**

**820.1 Because they are stewards of the environment.**

**820.2 Because they contribute to the economy.**

**820.3 Do not discriminate against the Wasatch Powderbird Guides.**

**Response:** The Revised Wasatch-Cache Forest Plan allows helicopter skiing to continue on the Forest under a 5-year SUP. The Forest Service does not discriminate against any Outfitter and Guide permittee.

Do Not Allow/Restrict Helis-skiing

**821. The Wasatch-Cache National Forest should prohibit/restrict heli-skiing.**

**821.1 By the year 2004**

**821.2 Terminate or phase out helicopter permits.**

**821.3 Because there is ample opportunity on private land.**

**821.4 If allowed, make them fly farther to avoid areas frequently accessed by others.**

**Response:** The Forest Plan provides broad program-level direction for management of the land and its resources. The Forest Plan, under Forest Wide Allocations, allows helicopter skiing. Wasatch Powderbird Guides (WPG) currently operates under a 5-year Outfitter and Guide Special Use Permit. The Revised Forest Plan continues to allow WPG to operate under the terms and conditions of their current 5-year SUP.

**822. The Wasatch-Cache National Forest should prohibit/restrict heli-skiing for environmental reasons because it negatively impacts wildlife because it negatively impacts birds.**

**Response:** Please refer to the September 1999 Final Environmental Impact Statement on Wasatch Powderbird Guides Permit Renewal for a thorough discussion of the effects of heli-skiing on wildlife. In this EIS a comprehensive mitigation plan was established with the advice and consent of the U.S. Fish and Wildlife Service (FWS). Due to WPG's season of operation, elevations at which they operate, the nature of the disturbance they generate, and the mitigation measures in place, their potential impact to wildlife is minimal.

**823. The Wasatch-Cache National Forest should prohibit/restrict heli-skiing in certain areas.**

**823.1 In the canyon areas.**

**Response:** The Wasatch-Cache National Forest provides a wide variety of recreational uses and opportunities to many user groups. The Forest Plan continues

to allow Wasatch Powerbird Guides to operate under the terms and conditions of their current 5-year Outfitter and Guide Special Use permit.

**823.2 Along the entire Wasatch Range.**

**Response:** The Wasatch-Cache National Forest provides a wide variety of recreational uses and opportunities to many user groups. WPG is one use and is currently allowed to operate under a 5-year SUP.

**823.3 In the Tri-Canyon area.**

**Response:** The Wasatch-Cache National Forest provides a wide variety of recreational uses and opportunities to many user groups. WPG is one use and is currently allowed to operate in the Tri-Canyon area under a 5- year SUP.

**823.4 In Gobbler's Knob.**

**Response:** The Wasatch-Cache National Forest provides a wide variety of recreational uses and opportunities to many user groups. WPG is one use and is currently allowed to operate in the Gobblers Knob area under a 5-year SUP.

**823.5 In semi-primitive non-motorized areas.**

**Response:** Alternatives 1 & 2 do this. In the Revised Forest Plan helicopter skiing will continue to operate as a component of the recreation picture in the Central Wasatch.

**824. The Wasatch-Cache National Forest should prohibit. Wasatch Powderbird Guides heli-skiing use in the Tri-Canyon area.**

**Response:** The Wasatch-Cache National Forest provides a wide variety of recreational uses and opportunities to many user groups. Wasatch-Powderbird Guides is one use and is currently allowed to operate in the Tri-Canyon area under a 5-year Outfitter and Guide Special User Permit.

Other

**825. The Wasatch-Cache National Forest should prohibit scenic commercial aircraft overflights.**

**Response:** Management of scenic overflights is under the jurisdiction of the Federal Aviation Administration, not the Forest Service.

**Motorized Recreation - Watercraft**

Allow Motorized Watercraft

**826. The Wasatch-Cache National Forest should allow motorized watercraft by allowing personal watercraft.**

**Response:** The Wasatch-Cache NF does allow boats with 5hp motors on lakes that are large enough not create user conflicts. Personal watercraft currently used on larger reservoirs would create unacceptable user conflicts on small National Forest lakes.

- 827. The Wasatch-Cache National Forest should open all lakes to boats with electric motors because there is no threat to the environment and this will permit the disabled to enjoy lakes.**

**Response:** The Wasatch-Cache NF does allow boats with 5hp motors on lakes that are large enough not create user conflicts.

Do Not Allow/Restrict Motorized Watercraft

- 828. The Wasatch-Cache National Forest should not allow motorized watercraft.**

**Response:** The Wasatch-Cache NF does allow boats with small motors on lakes that are large enough not create user conflicts.

Mechanized Recreation General

- 829. The Wasatch-Cache National Forest should manage mountain bikes as a distinct form of recreation, separate from motorized activities.**

**Response:** The Wasatch-Cache National Forest manages mountain bike use appropriately through management prescriptions; travel management plans and current trail management guidelines.

- 830. The Wasatch-Cache National Forest should recognize the importance of singletrack trails to bicyclists.**

**Response:** The Wasatch-Cache National Forest does recognize the importance of single-track trails to bicyclist. Not all trails are open to Mountain Bike use however.

- 831. The Wasatch-Cache National Forest should consider that designating the Mount Naomi roadless area as wilderness will lead to increased mechanized use and potential for conflict.**

**Response:** The Mount Naomi roadless area is not being considered for proposed wilderness.

- 832. The Wasatch-Cache National Forest should require bikers and hikers to share restrictions.**

**Response:** Because of safety, conflicts with other users and resources issues, mountain bike use requires a higher or more intense level of management and therefore requires more restrictions to manage use.

Allow Mechanized Recreation.

- 833. The Wasatch-Cache National Forest should allow mechanized activities.**

**833.1 On designated days and on trails that can sustain their travel**

**833.2 On roads and trails only.**

**833.3 Allow bikes off of designated trails.**

**Response:** Mountain bike use will continue to be restricted to trails where it is allowed. Please refer the District Travel Management Plans for locations of trails open to mountain bike use.

**834. The Wasatch-Cache National Forest should allow mechanized activities for environmental reasons.**

834.1 Because mountain bikes do not impact the environment.

834.2 Because mountain bikes do not affect water quality.

**Response:** The Current Plan allows mountain bike on designated trails. We believe that mountain bikes can impact water quality indirectly.

**835. The Wasatch-Cache National Forest should allow mechanized activities for social reasons because there is no information to support the claim that the presence of bicycles on shared-use trails increases the risk to other trail users' safety.**

**Response:** The Forest Plan allows mountain biking to continue on designated trails. The Forest Service feels every user's safety is extremely important. If shared trail use creates an unacceptably dangerous situation then that shared use will have to be evaluated and mitigated.

**836. The Wasatch-Cache National Forest should allow mechanized activities for economic reasons because mountain biking contributes to the local or regional tourism economy.**

**Response:** The Forest Plan continues to allow mountain biking on designated trails across the forest. Please refer to District Travel Plans.

**837. The Wasatch-Cache National Forest should allow mechanized activities in certain areas.**

**837.1 In wilderness areas**

**Response:** The Wilderness Act prohibits mechanized activities in Designated Wilderness areas.

**837.2 In limited areas**

**Response:** The Forest allows mechanized use on designated roads and trails. Refer to District Travel plans and winter motorized use plans to find out where mechanized use is allowed.

**838. The Wasatch-Cache National Forest should not restrict mountain biking because most users cause no damage.**

**Response:** The Forest Plan continues to allow mountain biking on designated trails. Refer to District Travel Plans to find out information on where you can mountain bike.

**Do Not Allow/Restrict Mechanized Recreation**

**839. The Wasatch-Cache National Forest should prohibit/restrict mechanized activities because it is dangerous to hikers and the environment.**

**Response:** The Wasatch-Cache National Forest will continue to allow mechanized and non-mechanized activities in appropriate areas on the Forest.

## Non-Motorized Recreation

### Adequacy of Analysis

**840. The Wasatch-Cache National Forest should consider the displacement effect of motorized recreation on non-motorized users.**

**Response:** Motorized recreation use will continue to allow motorized activities on designated trails. However, the forest will continue to monitor recreational use and will re-examine the forest role as a provider of outdoor recreation and plan for ways to reduce recreational conflicts between users. The Revised Forest Plan identifies recreation use conflicts as a significant issue and will continue to identify areas for separation of non-motorized use consistent with growing demand.

### Allow Non-Motorized Recreation.

**841. The Wasatch-Cache National Forest should allow non-motorized activities.**

**841.1 By giving non-motorized users the highest priority.**

**841.2 By designating all remaining roadless areas for non-motorized use.**

**841.3 By designating areas as non-motorized which fulfill non-motorized recreation needs.**

**841.4 By setting aside more areas.**

**841.5 By designating/providing areas that meet a variety of non-motorized activities.**

**841.6 By resource allocation.**

**841.7 By allowing horses.**

**841.8 By improving trail signs, displays, restroom facilities, and educational programs for non-motorized recreationists.**

**Response:** The Forest has evaluated a wide variety of alternatives when it comes to providing for non-motorized activities. Some of the alternative provide for increasing opportunities in non-motorized recreation, specifically alternatives 1 and 2. The Forest is continually improving trail signs, displays and restroom facilities. The Forest Service is continually improving educational curriculums it delivers through campfire talks, nature walks, avalanche and Ski with the Ranger programs.

**842. The Wasatch-Cache National Forest should allow non-motorized activities for social reasons because it is good for health and social values. They should also provide more non-motorized recreation opportunities for the disabled.**

**Response:** There are many areas the Forest that only allows non-motorized activity. The Forest is constantly improving existing campgrounds, picnic areas, recreation facilities and trails to better accommodate and serve persons with disabilities.

**843. The Wasatch-Cache National Forest should allow only non-motorized activities in some areas by allowing off highway foot traffic only.**

**Response:** The Wasatch-Cache NF management prescriptions provide for a broad range of recreational opportunities. Some areas allow motorized recreation, Some

areas do not allow any motorized activities such as in Wilderness. Refer to the Final Environmental Impact Statement for comparisons of alternatives by management prescription.

Do Not Allow/Restrict Non-Motorized Recreation

**844. The Wasatch-Cache National Forest should prohibit/restrict non-motorized activities**

**844.1 By prohibiting any wheeled non-motorized device except bicycles where permitted and wheelchairs.**

**Response:** The Wasatch-Cache NF management prescriptions provide for a broad range of recreational opportunities. Some areas allow motorized recreation, some areas do not allow any motorized activities such as in Wilderness. In some areas only hiking is allowed. Please refer to the Revised Forest Plan for descriptions of management prescriptions and management areas. Also, refer to the Final Environmental Impact Statement for comparisons of alternatives by management prescriptions.

**844.2 By prohibiting horses.**

**Response:** Horses are restricted in the Tri-Canyon and other specific areas for watershed protection and/or other reasons. Otherwise horse use is recognized as a legitimate recreational use and will continue to be allowed.

**845. The Wasatch-Cache National Forest should prohibit/restrict non-motorized activities for environmental reasons.**

**845.1 To control environmental impacts**

**Response:** The Forest Service is continually monitoring impacts to the Forest from all activities including non-motorized.

**845.2 Because hikers disturb wildlife more than motorized users**

**Response:** The Forest Service will continue to provide a broad range of recreational opportunities for all Forest users. There is no credible evidence that hikers disturb wildlife more than motorized use. However, there is a substantial body of scientific evidence that loud noises created by motorize vehicles like ATV's or four wheelers tend to disturb wildlife significantly more when compared to a person walking quietly in the woods.

Other

**846. The Wasatch-Cache National Forest should develop standards and guidelines to manage rock climbing and extreme sports because of environmental impacts.**

**Response:** Some standards and guidelines have been incorporated in the Forest Plan Direct for Climbing. The analysis of extreme sports and their routes are beyond the scope of the Forest Plan. Environmental impacts associated with those sports will be analyzed and managed on a site-specific basis.

**847. The Wasatch-Cache National Forest should not let sport climbing routes be ruined.**

**Response:** See response 846.

## **Ski Areas**

### **Ski Areas General**

**848. The Wasatch-Cache National Forest should address ski areas in the document because this use is important in terms of user days and impacts.**

**Response:** The Forest Plan and the Final EIS do address ski areas and their use. Please refer to Revised Forest Plan under Forest Wide Desired Future Conditions, Forest Wide Allocations and Management Area Descriptions for discussions of this issue.

**849. The Wasatch-Cache National Forest should substantially strengthen the desired future conditions description for ski areas.**

**849.1 To minimize future development and impacts.**

**Response:** The Revised Forest Plan and Final Environmental Impact Statement discuss this issue through a broad range of alternatives and the Ecosystem Management Framework and Forest Plan Model.

**849.2 To avoid facility construction designed to divert customers from other resorts.**

**Response:** This is beyond the scope and context of the Forest Plan. This issue will be discussed with site specific ski area proposals.

**850. The Wasatch-Cache National Forest should develop a travel plan to bus people from the mouth of the canyon to ski areas.**

**Response:** This is beyond the scope of the Forest Plan. The Utah Transit Authority already provides public bus service to the four ski resorts in Little Big and Little Cottonwood Canyons during the winter months.

**851. The Wasatch-Cache National Forest should make guideline G73 a standard and enforce its direction that special uses “meet the tests of prudent, reasonable, and absolutely in the public interest.” to prohibit uses that aren’t in the best interest of the public.**

**Response:** Guideline 73 has been removed. Please refer to G 80 & G 81 for guidelines for Special Uses.

**852. The Wasatch-Cache National Forest should include clearly stated visual quality standards to avoid further deterioration.**

**Response:** The Forest Service has adopted a new tool called the Scenery Management System for integrating the benefits, values, desires, and preferences regarding aesthetics and scenery for all levels of land management. Though many of the terms used in the previous Visual Management System have similar meaning



there are different key words being used. Visual quality of the Visual Management System is no longer used. The new terms used in understanding how the Forest is being managed are Landscape Character Themes, Landscape Character and Scenic Integrity Guidelines. See the Revised Forest Plan, Chapter 4, Section 3. Forestwide Standards and Guidelines, Scenic Resources for Forestwide Standards and Guidelines.

**853. The Wasatch-Cache National Forest should consider that the ‘high’ Scenic Integrity Objective within the Resort Natural Setting is an oxymoron.**

**Response:** Oxymoron is “a combination of contradictory or incongruous words” as stated in the Merriam-Webster Dictionary. Based on this definition you have stated you think or feel “high” Scenic Integrity is contradictory or incongruous with a Landscape Character Theme of Resort Natural Setting.

The basis for the use of Landscape Character Themes is to address existing or future land use, and the general image of the forest that is being managed. Resort Natural Setting Landscape Character theme for the purpose of the Revised Forest Plan is confined to the permit boundaries of the resorts. It recognizes that cultural modification to mountain is a function of activities and their supporting amenities.

Scenic Integrity provides a way to measure the degree to which a landscape is visually perceived to be complete. The highest scenic integrity rating was given to the landscape, which has little or no deviation from the described landscape character valued by constituents for its aesthetic appeal. See Revised Forest Plan, Chapter 4, Wasatch-Cache National Forest Landscape Character Theme and Scenic Integrity Guideline Definition Table. The landscape character of this culturally modified landscape is rating integrity of the modifications based on its harmony with the surrounding natural appearing landscape setting and provides baseline attributes to be able to meet a particular level of integrity.

If the ski resorts were being managed under another Landscape Character Theme and its accompanying landscape character description the Scenic Integrity could be lower or higher based on the amount of deviation from the described valued landscape character. Therefore the delineated areas on the Forest for each Landscape Character Theme must be judged against its own landscape character description for the degree of integrity that can be achieved.

**854. The Wasatch-Cache National Forest should add a standard requiring ski areas to reseed cuts, runs, and other cleared areas.**

**Response:** Current Forest Service and County “Best Management Practices” require ski areas to reseed cuts, runs and other cleared areas with native species.

**855. The Wasatch-Cache National Forest should require ski area managers to work with their staff to change attitudes about wildlife and minimize direct wildlife impacts.**

**Response:** Ski areas operating on the Wasatch-Cache National Forest work closely and carefully with Forest Service Wildlife Biologist and other staff persons to minimize potential effects to wildlife. Forest Service personnel accomplish this through environmental reviews of all ski area proposals as well as yearly operating plans and through frequent monitoring activities.

- 856. The Wasatch-Cache National Forest should require all ski resorts operating under special use permits to hire an environmental administrator and have a peer review board in order to operate on public lands.**

**Response:** Refer to response 855.

- 857. The Wasatch-Cache National Forest should request resorts close a half hour earlier each night where night skiing occurs for safety and to reduce light pollution.**

**Response:** This issue is beyond the scope of the Forest Plan. Brighton is the only ski resort with a significant night skiing program on the Wasatch-Cache National Forest. The effects of night skiing lighting were carefully analyzed and thoroughly discussed in the 1999 Brighton Ski Resort Master Plan EIS.

- 858. The Wasatch-Cache National Forest should adjust ski area trail widths or create new trails to deal with the increase of traffic caused by higher speed and higher capacity lifts to keep a competitive edge.**

**Response:** This issue is beyond the scope of the Forest Plan. This issue has been thoroughly analyzed and discussed in several recent EIS's completed for local Ski Resort Master Development plans.

- 859. The Wasatch-Cache National Forest should redraw the national forest boundary so that Snowbird ski and summer resort is under the jurisdiction of one national forest, not two. This would be less confusing and lead to less miscommunication.**

**Response:** The Wasatch-Cache National Forest administers Snowbirds Special Use Permit, allowing them to operate on National Forest System lands. Snowbirds permit area boundary encompasses public and private land, crosses county and Forest boundaries and includes separate and distinct watersheds. Each County and Forest has jurisdictional responsibilities related to Snowbirds operations and each will continue exercise those responsibilities. Only Congress has the authority to change Forest Boundaries.

- 860. The Wasatch-Cache National Forest should address the degradation of watershed health due to ski resort expansion and operations. A description of the effects of ski resorts on aquatic resources should be included.**

**Response:** The Forest Plan discusses watershed management within the framework of ecosystem management and sustainability. Please refer to the FEIS, Chapter 3, Topic 1 (Watershed Health) and Topic 2 (Aquatic Resources), Wasatch-Cache National Forest for a thorough discussion of this issue.

- 861. The Wasatch-Cache National Forest should disclose skier density so the public can make informed comment on the acceptability of the rapid increase in the amount of land allocated per skier.**

**Response:** Skier densities are difficult to measure accurately and vary widely depending upon time of day, weekday or weekend and time of year, such as a holiday weekend, and vary widely from year to year. In addition, skier density can vary widely due to run difficulty, snow conditions, grooming conditions etc. Consequently, calculating accurate skier densities is extremely difficult and unreliable.

- 862. The Wasatch-Cache National Forest should estimate the number of skier days attributable to snowmaking to differentiate the portion of growth attributable to snowmaking because it has no bearing on whether there is demand for more terrain for skiing.**

**Response:** The Wasatch-Cache National Forest did not calculate the number of skier days attributed to snowmaking since reliable data is unavailable. Skier visits at individual ski resorts vary annually due to differences in natural snow, marketing trends, or factors other than snowmaking. To distinguish between the numbers of skier days attributed to snowmaking would be questionable at best.

- 863. The Wasatch-Cache National Forest should assess the importance of non-motorized winter recreation areas and the yurt system.**

**Response:** Non-motorized winter recreation is an important component of the total recreational use on the forest. Alternatives 1 & 2 of the Wasatch-Cache Final EIS discuss the importance of minimizing human interference and reducing motorized use. Alternative 7 in the Final EIS and The Revised Forest Plan create a non-motorized area in the Bunch Grass and Steam Mill peak area in the Logan Area Mountains.

#### Education.

- 864. The Wasatch-Cache National Forest should increase public education about the stewardship benefits of ski areas.**

**Response:** The Forest Service and Wasatch-Cache ski areas in partnership have created Ski With the Ranger Programs and “Ski-Cology.” Both of these programs educate forest users on the stewardship benefits of ski areas.

#### Skiing

- 865. The Wasatch-Cache National Forest should allow skiing.**

**865.1 By designating non-motorized winter recreation areas with enforceable boundaries or banning snowmobiles from the surrounding areas.**

**Response:** All of the alternatives in the Wasatch-Cache Final EIS designate non-motorized areas with enforceable boundaries to varying degrees. In the Alternatives 1 & 2, non-motorize use is emphasized and snowmobiling is banned in most areas.

**865.2 By including quality skiing experiences in the Desired Future Conditions**

**Response:** Desired Future Condition is an integrated visualization of what the forest or management area should look like in the future. Skiing is a recreational activity, which people do on the forest. A quality skiing experience whether it occurs at a ski area or in a backcountry setting has always been an important component of the forests desired future condition for recreation management.

**866. The Wasatch-Cache National Forest should encourage cross-country skiers to ski in wilderness areas.**

**Response:** The Wasatch-Cache National Forest has always and will continue to encourage responsible recreational use that is allowed in Wilderness.

Ski Area Expansion

**867. The Wasatch-Cache National Forest should address ski area expansion by defining year round resort development and requiring that each proposal be linked to a need that can only be met in an alpine setting.**

**Response:** This is beyond the scope of the Forest Plan. Any ski area expansion proposal is thoroughly analyzed through the development of ski area master plans an accompanying NEPA review. A needs analysis is a required component of any NEPA document.

**867.1 By establishing a reasonable process other than a Forest Plan amendment for potential adjustment or expansion of resort permit boundaries during the life of this plan.**

**Response:** The Revised Forest Plan states: “New resort developments on National Forest System land will be confined to the permit area boundaries in effect at the time of revision, though small-scale site-specific adjustment could be considered to address important management issues.” The process for forest plan amendments can be found in Chapter 5 of the Revised Forest Plan.

**867.2 By clarifying that language on page 4-99 of the Forest Plan does not prohibit the Forest Service from considering proposals for boundary expansion.**

**Response:** The Revised Forest Plan on page 4-99 reads, “New resort developments on National Forest System lands will be confined to the permit area boundaries in effect at the time of revision, though small scale site specific adjustments could be considered to address important management issues.” The process for forest plan amendments can be found in Chapter 5 of the Revised Forest Plan.

**867.3 By recognizing that the issue of ski area expansion onto private lands is still under consideration.**

**Response:** The Forest Service has no jurisdiction over private lands. State, Counties and Municipalities typically have various types of jurisdictional authority over private land. Refer to response above.

**867.4 By suggesting that the ski areas apply better resource management while they are open rather than expand.**

**Response:** Ski areas operate on public land under a Special Use Permit administered by the Forest Service. The Forest Services manages the terms and conditions of the SUP, not the day-to-day operation of the resort.

**868. The Wasatch-Cache National Forest should change language in the Forest Plan.**

**868.1 On page 4-99 regarding ski resort developments.**

**Response:** The Statement in the Revised Forest Plan reads, “New Resort Developments on National Forest System Lands will be confined to permit boundaries in effect at the time of revision...”

**868.2 On page 4-99 regarding opportunities that build on public land values.**

**Response:** We have chosen not to change the language in the Revised Forest Plan.

**868.3 On pages 53 and 54 because the language pertaining to ski area development is too permissive.**

**Response:** We were unable to find sentence the statement that was being referred to on pages 53 and 54.

**869. The Wasatch-Cache National Forest should explain in the Forest Plan that regular maintenance or replacement of existing resort equipment and/or facilities are categorically excluded from the National Environmental Policy Act analysis.**

**Response:** A Forest Plan provides broad program level direction for management of the land and its resources. A Forest plan does not contain commitments to implement specific projects. All proposed projects involve some level of environmental analysis and public involvement and that is where these decisions will be made.

**870. The Wasatch-Cache National Forest should write a directive into the Tri-Canyon Crisis Plan regarding approval for modifications of existing developments.**

**Response:** All major or significant modifications of existing developments on private or public land in the Tri-Canyons require various approvals either from the State of Utah, Salt Lake County, Salt Lake City and/or the Forest Service and sometimes all four.

**871. The Wasatch-Cache National Forest should address the concern over the total number of gallons of petroleum fuel planned to be stored within the Hidden Peak expansion.**

**Response:** This is beyond the scope of the Forest Plan. This issue was thoroughly analyzed in the recent Snowbird Master Development Plan and accompanying Environmental Impact Statement.

Allow Ski Area Expansion

- 872. The Wasatch-Cache National Forest should not place restrictions on the ski industry based on the speculative possibility that the, or other species, will be placed on the endangered species list because a flexible policy will allow the Forest Service to react as science develops rather than make premature restrictions.**

**Response:** The Endangered Species Act directs all government agencies to protect species listed as threatened and endangered. This includes habitat. Eleven counties in Northern Utah are included as lynx habitat by the US Fish and Wildlife Service (FWS). Salt Lake County is one of those counties. The Forest will work closely with the FWS on all mitigation requirements they outlined for this species. The Forest Plan provides broad program-level direction for management of the land and its resources. Future projects carry out the direction in the Forest Plan. Ski areas fall into a subset of recreation goals and objectives affecting Forest lands. Within the framework of the Forest Plans effort for ecosystem management, these topics are adequately addressed.

- 873. The Wasatch-Cache National Forest should expand the new swing because it is the only environmentally safe way to drop users off without damaging the ecosystem.**

**Response:** The question cannot be answered as it is worded.

- 874. The Wasatch-Cache National Forest should eliminate the visual integrity of ridgelines requirement for Mount Ogden to allow gondola construction.**

**Response:** This is a Recreation Desired Future Condition for the Snowbasin Ski Area and the integrity of the ridgeline would be evaluated on a case-by-case basis and is beyond the scope of this analysis.

Do Not Allow/Restrict Ski Area Expansion.

- 875. The Wasatch-Cache National Forest should prohibit/restrict ski area expansion and infrastructure development.**

**875.1 Do not expand beyond the year 2000 boundaries**

**875.2 Do not allow activities resembling expansion beyond current boundaries.**

**875.3 Do not use public land to subsidize real estate development.**

**875.4 Do not justify expansion by claiming to protect backcountry travelers from dangers such as avalanches.**

**875.5 Prohibit infrastructure development.**

**875.6 Because the industry has not experienced significant growth.**

**875.7 Because of increased dispersed recreation.**

**875.8 Because it is taking away non-motorized areas.**

**Response:** The expansion issue is addressed in the Revised Forest Plan and through the broad range of alternatives displayed in the Final Environmental Impact Statement. The Forest Plan in Chapter 4 under the Central Wasatch Management

area states: New resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues. Any proposed ski resort expansion and infrastructure development is studied and approved through a site specific Resort Development Master Plan. This includes a thorough NEPA review.

**876. The Wasatch-Cache National Forest should prohibit/restrict ski area expansion and infrastructure development for environmental reasons.**

**876.1 Because of cumulative impacts.**

**876.2 Because of the artificial and substantial increases of human impacts.**

**876.3 To protect watersheds.**

**876.4 To protect wildlife.**

**876.5 To protect nesting birds.**

**876.6 Because of night sky pollution.**

**876.7 Because it affects aesthetic qualities.**

**876.8 Have clear language in the Forest Plan setting standards for forest preservation.**

**876.9 Until provisions are met for monitoring, enforcement, clean up, and maintenance.**

**Response:** The expansion issue is addressed in the Revised Forest Plan and through the broad range of alternatives displayed in the Final Environmental Impact Statement. The Forest Plan in Chapter 4 under the Central Wasatch Management area states, “New resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues.” Any proposed ski resort expansion and infrastructure development is studied and approved through a site specific Resort Development Master Plan. This includes a thorough NEPA review.

**877. The Wasatch-Cache National Forest should prohibit/restrict ski area expansion and infrastructure development for social reasons**

**877.1 Because it does not benefit everyone.**

**Response:** Alternatives 1 & 2 do this.

**877.2 Because crowding and safety issues do not justify expansion**

**Response:** The expansions issue is addressed in the Revised Forest Plan and through the broad range of alternatives displayed in the Environmental Impact Statement. The Forest Plan in Chapter 4 under the Central Wasatch Management area states, “New resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues.” Alternative 7 in the Final EIS covers this issue. Any proposed ski resort expansion and infrastructure development is studied and approved through site specific Resort Development Master Plans and accompanying NEPA review.

**878. The Wasatch-Cache National Forest should prohibit/restrict ski area expansion and infrastructure development in certain areas and specific resorts.**

**Response:** The expansions issue is addressed in the Revised Forest Plan and through the broad range of alternatives displayed in the Environmental Impact Statement. The Forest Plan in Chapter 4 under the Central Wasatch Management area states, “New resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues.” Alternative 7 in the Final EIS covers this issue. Any proposed ski resort expansion and infrastructure development is studied and approved through site specific Resort Development Master Plans and accompanying NEPA review.

**879. The Wasatch-Cache National Forest should prohibit avalanche control outside of ski resort boundaries and traffic corridors.**

**Response:** This issue was analyzed in the final Environmental Impact Statement Wasatch Powderbird Guide (WPG) permit renewal. WPG is allowed to use explosives for snow stability evaluation as part of the safe operation of their business. This use is authorized under the terms of their Special Use Permit.

**880. The Wasatch-Cache National Forest should develop a standard that prohibits ski and snowboard area expansions and prohibits development of new ski/snowboarding areas on a forest-wide basis.**

**Response:** See Response to question 878

**881. The Wasatch-Cache National Forest should prohibit resort building on prominent ridges because it alters the viewshed**

**Response:** Any proposed ski resort expansion and infrastructure development is studied and approved through site specific Resort Development Master Plans and accompanying Environmental Impact Statements. This issue is addressed in the Forest Plan and through the broad range of alternatives displayed in the Final Environmental Impact Statement.

**882. The Wasatch-Cache National Forest should not allow ski resorts to turn into all season recreation areas or destination resorts because of impacts to wildlife.**

**Response:** See response 876.

**883. The Wasatch-Cache National Forest should prohibit the development of trams or lifts in roadless areas.**

**Response:** The Forest Plan does this.

**884. The Forest Plan should state that lift-served expansion at Snowbasin will be discouraged outside current boundaries.**

**Response:** The expansion issue is also addressed in the Forest plan and through the broad range of alternatives displayed in the Environmental Impact Statement. The Forest Plan in Chapter 4 under the Central Wasatch Management area states, “New



resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues.” Alternative 7 in the Wasatch-Cache Final EIS covers this issue. Any proposed ski resort expansion and infrastructure development is studied and approved through site specific Resort Development Master Plans and accompanying NEPA review.

#### Ski Area Interconnects

**885. The Wasatch-Cache National Forest should allow ski area interconnects.**

**Response:** The Forest Plan provides broad program-level direction for management of the land and its resources. The forest plan, in chapter four in the Central Wasatch Management Area talks about new resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision. Any proposed resort expansion and infrastructure development within the existing resort boundaries or ski area interconnects will be studied through site specific Resort Development Master Plans and accompanying NEPA Review.

**886. The Wasatch-Cache National Forest should keep open the possibility of allowing future construction of a gondola connecting Ogden City with Snowbasin Resort.**

**Response:** Any proposed ski resort expansion and infrastructure development is studied and approved through site specific Resort Development Master Plans and accompanying Environmental Impact Statements.

**887. The Wasatch-Cache National Forest should prohibit interconnection of ski areas because they are not needed.**

**Response:** The Forest Plan provides broad program-level direction for management of the land and its resources. The Forest Plan, in Chapter 4 in the Central Wasatch Management Area, states that new resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision. Any proposed resort expansion and infrastructure development within the existing resort boundaries and ski area interconnection will be studied through site specific Resort Development Master Plans and accompanying NEPA Review.

**888. The Wasatch-Cache National Forest should clarify that the prohibition of ski area expansion includes ski area interconnects.**

**Response:** The Forest Plan provides broad program-level direction for management of the land and its resources. The forest plan, in chapter four in the Central Wasatch Management Area talks about how new resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision. Any proposed resort expansion or infrastructure development within the existing resort boundaries and ski area interconnections will be studied

through site specific Resort Development Master Plans and accompanying NEPA Review.

### **Hunting and Fishing**

**889. The Wasatch-Cache National Forest should prohibit hunting.**

**889.1 In the Wasatch Range**

**889.2 In the Cottonwood Canyons**

**Response:** See response 65.

### **Outfitter-Guides/Special Use Permits**

**890. The Wasatch-Cache National Forest should allow guided access.**

**Response:** The need for guided access will be determined by the criteria noted in Chapter 5 of the Revised Forest Plan and in conjunction with the Revised Forest Plan Goals and Sub-goals and Standards and Guidelines.

**890.1 Because this will bring more funding for motorized trail upkeep**

**Response:** See response 890.

**890.2 For safety reasons**

**Response:** See response 890.

**891. The Wasatch-Cache National Forest should retain designations for special use permit holders.**

**Response:** The Forest will continue with current special uses as identified in Revised Forest Plan Chapter 4, A.4. Forestwide Standards and Guidelines.

**892. The Wasatch-Cache National Forest should make it easy to obtain guiding licenses.**

**Response:** See response 890.

**893. The Wasatch-Cache National Forest should consider a permit system for wilderness areas when other plans to reduce use are not successful.**

**Response:** Thank you for your comment. A permit system could be one of the management options for reducing use in the Wilderness.

**894. The Wasatch-Cache National Forest should document the public demand for outfitters/guides.**

**Response:** See Revised Forest Plan, Chapter 5, and Monitoring.

## Camping

### Camping General

- 895. The Wasatch-Cache National Forest should consider that the Preferred Alternative best meets the recreation demand because it allows additional facility development in the more developed Recreation Opportunity Spectrum classes, but emphasizes replacement of current facilities and site hardening.**

**Response:** Thank you for your comment.

- 896. The Wasatch-Cache National Forest should determine which recreation sites need to be hardened to protect the environment and natural landscape.**

**Response:** Considering site hardening at recreation sites would be completed at the project level and is beyond the scope of the Revised Forest Plan analysis.

- 897. The Wasatch-Cache National Forest should not harden campsites.**

**Response:** See response 896.

- 898. The Wasatch-Cache National Forest should remove and relocate campgrounds in riparian zones and flood plains to upland sites so that riparian areas can be reclaimed.**

**Response:** Removing and relocating campgrounds would be a project level decision, which is beyond the scope of the Forest Plan. At the program level however, direction is given in the Revised Forest Plan, MPC 3.1-Aquatic Habitat (3.1A) /Watershed (3.1W) where emphasis is on maintaining or improving quality of watershed conditions and aquatic habitats. This would be a consideration when projects are proposed and one option that could be considered is removal and relocation of a campground.

- 899. The Wasatch-Cache National Forest should continue using concessionaires to encourage small businesses.**

**Response:** Thank you for your comment the WCNF will continue to use concessionaires to help in the management of their recreation facilities.

- 900. The Wasatch-Cache National Forest should address its management of camping areas in Logan Canyon because current management is driving people away.**

**Response:** This is too specific and beyond the scope of the Forest Plan, but we will pass this information on to the managing unit.

- 901. The Wasatch-Cache National Forest should allow only minor further development of existing campgrounds and picnic sites in Logan Canyon.**

**Response:** See response 900.

Allow Camping

**902. The Wasatch-Cache National Forest should provide more areas for camping.**

**Response:** New developed recreation facilities are proposed in all alternatives except Alternative 1. See Chapter 2 of the FEIS.

**902.1 By keeping campgrounds open**

**Response:** See response 900.

**902.2 By providing all season camping areas in Little Cottonwood Canyon**

**Response:** See response 900.

**902.3 By extending the camping area in Tony Grove**

**Response:** See response to concern statement 900.

**902.4 By allowing natural unplanned campgrounds**

**Response:** As per the Revised Forest Plan in Recreation goals and objectives the WCNF will inventory and develop concentrated use area plans for recreation where site amenities will focus on protection of the Forest resources. This will meet your definition of unplanned campgrounds.

**902.5 By allowing larger campsites to accommodate larger camping vehicles**

**Response:** See response 900.

**902.6 By creating a horse camp in Franklin Basin**

**Response:** See response 900.

**903. The Wasatch-Cache National Forest should maintain present camping opportunities and winter and summer recreational activities.**

**Response:** Alternative 7 for recreation is very close to the existing condition for winter and summer recreational opportunities.

Do Not Allow/Restrict Camping

**904. The Wasatch-Cache National Forest should prohibit large organizational camping groups in the Provo River drainage and Hayden Fork.**

**Response:** See response 900.

**905. The Wasatch-Cache National Forest should control scout troops.**

**Response:** See response 900.

**906. The Wasatch-Cache National Forest should confiscate unattended property for those who disregard the fourteen-day camping restriction.**

**Response:** See response 900.

## Dogs

### Dogs General

**907. The Wasatch-Cache National Forest should address management of dogs and the health of the forest**

**Response:** The issue of managing dogs on the Forest is indeed not addressed in the Revised Forest Plan. This issue is an important one at this time primarily in the Central Wasatch Management Area (Tri-Canyon) watersheds and is being addressed jointly by the Salt Lake County and the Salt Lake Ranger District. It was too site-specific to be adequately addressed in the broad environmental analysis for Forest Plan Revision.

### Allow Dogs

**908. The Wasatch-Cache National Forest should allow dogs.**

**908.1 Allow dogs in all canyons**

**908.2 Allow dogs in Millcreek Canyon**

**908.3 Implement a permit system to allow dogs in watershed areas**

**908.4 Provide for dispersed dog-friendly recreation opportunities**

**908.5 Set land aside for off-leash dog areas or conduct studies and open all canyons to dogs**

**Response:** See response 907.

### Do Not Allow/Restrict Dogs

**909. The Wasatch-Cache National Forest should prohibit/restrict dog visits.**

**Ban dogs in Mill Creek Canyon**

**Incorporate regulations for dogs**

**Response:** See response 907.

## Miscellaneous Activities

**910. The Wasatch-Cache National Forest should prohibit concerts and resort-sponsored activities because of light and noise pollution.**

**Response:** Activities within ski area boundaries are regulated through the Special Use Permit and Operating Plans rather than in the broad forestwide direction of the Revised Forest Plan. Activities adjacent to ski area permit boundaries will be subject to the management prescriptions mapped there in the Revised Forest Plan. These prescriptions include standards and guidelines that spell out the types of activities that are allowed or not allowed there including new trail construction. Outfitter guide services are regulated by the specific Special Use Permit issued for that service and are not addressed by the broad direction of the Revised Forest Plan.

**911. The Wasatch-Cache National Forest should manage the people who use the national forests to party because they disrupt other people.**

**Response:** Management Direction included in the Revised Forest Plan does include recreation opportunity class maps that show where one should expect to find different degrees of solitude and facility development. In those areas where the user densities are expected to be relatively high, interactions between visitors are to be expected. The Revised Plan also includes an Objective to increase the amount of education and enforcement in order to reduce conflicts between forest users. User ethics is an area of focus for the education and enforcement that we expect to emphasize over the life of the Plan.

### Scenery

**912. The Wasatch-Cache National Forest should elevate Guideline 52 on page 4-30 to a standard and modify the wording to maintain scenic integrity.**

**Response:** The goal states: “Resource management activities should not be permitted to reduce Scenic Integrity below Objectives stated for Management Prescription Categories.” Because the Scenic Integrity Objectives (SIOs) are desired future condition for Forest landscapes a site-specific analysis will need to take place to determine the ability of the landscape to maintain the SIO. Being able to provide to the public rational for such a deviation would be more in line with a desired future condition than to have a binding limitation that would require a Forest Plan amendment.

## Topic 5: Roadless Areas/Wilderness Management

### Roadless Areas/Wilderness Management General

#### Management General

**913. The Wasatch-Cache National Forest should protect public lands as wilderness and roadless areas.**

**913.1 Because they provide a high quality of life**

**913.2 Because they provide high quality hunting experiences**

**Response:** We agree. Certain public lands that meet the criteria for Wilderness can provide a variety of ecosystem benefits and unique recreation opportunities for the public. The forest plan alternatives analyze several possibilities.

**914. The Wasatch-Cache National Forest should adopt suggestions made by the High Uintas Preservation Council regarding wilderness and roadless area management.**

**Response:** The recommendations made by this organization have been considered and are included in the range of alternatives for possible wilderness recommendations and oil and gas leasing.

**915. The Wasatch-Cache National Forest should focus development in areas that are already developed.**

**Response:** Already developed areas are allocated to management prescriptions that allow further development or redevelopment. In undeveloped areas (roadless areas) a range of management prescriptions has been applied across the range of alternatives that allow for development, mostly maintain roadless values, or fully maintain them.

Roadless Area/Wilderness Boundaries

**916. The Wasatch-Cache National Forest should adjust the boundaries of roadless and wilderness areas in order to provide necessary protection.**

**916.1 Burch Creek Roadless Area**

**Response:** The comments received are very detailed and site-specific proposing minor adjustments to roadless area boundaries or recommendations to improve manageability for recommended Wilderness. These comments are valuable, and can be used to make minor adjustments when, and if a decision to protect the roadless or wilderness character is made. Until that time, the comment has generally been considered as within the range of alternatives for the allocation of management prescriptions and other management direction for the area.

**916.2 High Uintas**

**Response:** We recognize your position that much of the area should be recommended as Wilderness, and your comment is considered within our range of alternatives. These are also very detailed and site-specific, proposing minor adjustments to roadless area boundaries or recommendations to improve manageability for recommended Wilderness. These comments are valuable, and can be used to make minor adjustments when, and if a decision to protect the roadless or wilderness character is made. Until that time, the comment has generally been considered as within the range of alternatives for the allocation of management prescriptions and other management direction for the area.

**916.3 Lakes Area**

**Response:** See response 916.2

**916.4 Lone Peak additions**

**Response:** See response 916.1

**916.5 Mount Aired**

**Response:** See response 916.2

**916.6 Mount Naomi**

**Response:** See response 916.2

**916.7 Mount Olympus**

**Response:** See response 916.1

**916.8 Stansbury Management Area**

**Response:** See response 916.2

**916.9 Upper South Fork Roadless Area**

**Response:** See response 916.2

**916.10 White Pine**

**Response:** See response 916.2

**Roadless Area Management**

Roadless Area Management General

**917. The Wasatch-Cache National Forest should consider local input when deciding how to manage roadless areas.**

**Response:** The range of alternatives and Appendices C1 and C2 speak directly to the individual values of roadless areas and their potential for wilderness recommendation. We believe our range of alternatives and site specific considerations of values are responsive to local opinions on how to manage these areas. Local input on their management was considered in the planning process through public meetings and written and oral input.

**918. The Wasatch-Cache National Forest should add a project level consideration of roadless areas.**

**Response:** The values of roadless areas are considered by project level proposals. While these are not forest plan decisions, interim direction to protect roadless area values is in place for project level decisions and is also provided in established Forest Service direction on environmental policy and procedures (FSH 1909.15).

**919. The Wasatch-Cache National Forest should protect roadless areas to preserve environmental values.**

**Response:** We recognize the values of roadless areas both on the Wasatch-Cache and elsewhere. Appendix C-2 identifies many of the roadless values present on the Wasatch-Cache. The range of alternatives provide for a variety of management schemes ranging from largely maintaining these values or to allowing considerable use and development of roadless areas.

**920. The Wasatch-Cache National Forest should maintain roadless area characteristics of all inventoried roadless areas.**

**920.1 By keeping existing roadless areas roadless**

**920.2 By prohibiting all development and motorized recreation**

**Response:** See response 919.

**921. The desired future condition descriptions for Burch Creek and Taylor Canyon should specify that special use proposals will not impact roadless characteristics of these areas.**



**Response:** We recognize your interest in this area and a range of alternatives from recommended Wilderness and roadless protection to management that would allow considerable development is laid out for these two areas in the FEIS and accompanying maps.

**922. The Wasatch-Cache National Forest should not manage roadless areas as non-motorized.**

**Response:** In some alternatives that recommend a lot of wilderness most of the roadless areas on the Wasatch-Cache are managed for non-motorized use. In most alternatives considerably more of roadless areas is available for either summer or winter motorized use. Readers should be reminded that inventoried roadless areas are not necessarily non-motorized. The roadless character of an area does not prescribe non-motorized trail use. The motorized or non-motorized use of trails is a travel management decision, is not dependent on roadless character, and is generally outside the scope of the decisions being made in this forest plan revision. Winter motorized and non-motorized uses for areas of the forest are decided by the forest plan revision and are shown on the Winter Recreation maps.

**923. The Wasatch-Cache National Forest should avoid managing all roadless areas the same.**

**Response:** Considerable variety in the management of roadless areas is presented across the range of alternatives in the FEIS. While Alternatives 1, 2, and 6 applied the national roadless rule at the time of their formulation, and still maintain many blanket protections for roadless character, the other alternatives provide a different set of potential management and uses for roadless areas. In the FEIS, Appendices C1 and C2 discuss the potential wilderness and roadless values of roadless areas, while the Topic 5 in Chapter 3 looks at alternatives for managing these areas.

**924. The Wasatch-Cache National Forest should eliminate human use of roadless areas under any prescription other than wilderness.**

**Response:** In the FEIS Alternative 1 essentially falls in this category of management. Other alternatives allows different ranges of maintenance of roadless area values or potential human uses of roadless areas. Forest management and the planning team tried to examine a broad range of alternatives for roadless area management.

Adequacy of Analysis

**925. Public Concern: The Final EIS should clarify exactly how many acres of roadless lands exist on the forest and correct discrepancies in the document text.**

**Response:** The Topic 5 in Chapter 3 of the FEIS and Appendices C1 and C2 show Wasatch-Cache inventoried roadless areas, their values as wilderness or other roadless values and their acreages. Topic 5 in the FEIS and Table C1-1 and related text in Appendix C talk to changes in these roadless areas over time provide some caveats regarding the accuracy of inventory acreages.

- 926. The Wasatch-Cache National Forest should state in the Forest Plan that because the plan does not analyze environmental effects of activities in roadless areas, an additional EIS will be required for significant federal actions affecting roadless areas.**

**Response:** Procedural requirements for project environmental analyses are covered in departmental regulations and agency policy, and need not be repeated in these documents. It is true, however, that project proposals in inventoried roadless areas carry with them additional considerations for analysis and disclosures of effects.

- 927. The Wasatch-Cache National Forest should remove reference to inventoried roadless areas from tables in the Draft EIS.**

**Response:** A range of considerations for how to treat roadless areas was considered across alternatives. In some alternatives no distinctions between allowed activities within roadless areas and outside them was considered. In other alternatives there were differences between activities allowed inside or outside roadless areas. We think this presented both a reasonable and legal range of alternatives.

#### Roadless Area Designation General

- 928. The Wasatch-Cache National Forest should ground proof the linear route off of Red Butte Road before including this area in the roadless inventory.**

**Response:** This was done since the publication of the DEIS. The Red Butte Road is a cherry-stem into the roadless area to a point where the road is no longer maintained or passable by a passenger car. At this point the original “road” is more trail-like in its character and not considered a road from a roadless inventory perspective as it proceeds further into the area. The Red Butte RNA is closed to the general public and not available for recreation.

#### Roadless Area Criteria

- 929. The Wasatch-Cache National Forest should protect roadless areas that are adjacent to wilderness areas.**

**Response:** Prescriptions for recommended wilderness, maintenance of roadless values or development were applied to roadless areas adjacent to designated Wilderness across the alternatives to provide a range of considerations regarding potential effects. See the management prescription, ROS, and winter recreation maps for the alternatives.

- 930. The Wasatch-Cache National Forest should not define areas with roads as roadless.**

**Response:** The procedures for mapping roadless areas and definitions for what constitutes a road are laid out by the Intermountain Region protocol, Roadless Inventory and Evaluation Guide (1998), for doing this work. That protocol was made available to and reviewed for the public during the roadless inventory public open houses in the Fall of 1998. While opinions and definitions related to this work

still differ, the definitions, and procedures for our inventory were disclosed publicly and are on file.

**931. Public Concern: The Wasatch-Cache National Forest should fully evaluate roadless areas using additional criteria as established in 219.17**

**Response:** Considerable effort was spent between the publication of the DEIS and the FEIS on doing more analysis of roadless area values. The criteria for the evaluations done in Appendices C1 and C2 of the FEIS are shown there. These criteria cover what is legally required in the forest planning process in 36 CFR 219.17 and go further than that by considering additional criteria also.

Do Designate Roadless Areas

**932. The Wasatch-Cache National Forest should designate certain areas roadless.**

**932.1 Mineral Fork**

**932.2 Mueller Park and Red Butte Canyon**

**932.3 Swan Peak**

**Response:** These four areas are included in the roadless inventory. Mueller Park and Red Butte were added as roadless areas between the Draft and Final EISs as a result of public comments. The values of these areas for wilderness recommendation and as roadless areas are considered in Appendices C1 and C2 to the FEIS. A range of management types for these areas is also presented in the FEIS.

**933. The Wasatch-Cache National Forest should designate the watershed areas as roadless in the Wheeler Creek Drainage.**

**Response:** A range of management prescriptions for the Wheeler Creek Drainage are considered in the FEIS, and these can be seen in the maps of those prescriptions and interpreted using management prescription definitions found in Chapter 4 of the revised Forest Plan. Watershed values among with many other values were considered in evaluating roadless areas. The undeveloped area on the Wasatch-Cache including Wheeler Creek did not meet the minimum 5,000 acre size to qualify as a roadless area defined by FS Handbook 1909.12. and the draft Intermountain Region protocol on Roadless Inventory and Evaluation Guide (1998).

Do Not Designate Roadless Areas

**934. The Wasatch-Cache National Forest should not designate any more land as roadless or wilderness.**

**Response:** Roadless areas are not “designated”. While this response may seem bureaucratic, trifling and based on semantics, the words used are important to us. Roadless areas are identified by the Forest Service through a required inventory process that is based on published criteria. After its inventory, the Forest Service is required by the planning regulations (36 CFR 219) to consider recommendations of

appropriate roadless areas to the National Wilderness Preservation System. These recommendations eventually go to Congress for its consideration.

Wilderness areas are “designated”. This is done when Congress passes Wilderness acts. Congress reviews the recommendations from the Forest Service, and if it senses public opinion, resource, political, and social needs support a choice for designation it can deliver these laws and formally “designate” more Wilderness.

Alternatives 4 and 5 in the FEIS provide for no more Wilderness, and only limited protection for roadless area values. See the Topic 5 discussion in Chapter 3 of the FEIS.

#### Other Designations

**935. The Wasatch-Cache National Forest should develop a Back Country Recreation Area designation for roadless areas.**

**Response:** See response 98.

Additionally, your comment has many good suggestions discussing what Congress might do and what the BLM has provided for as administrative solutions for dealing with roadless area values and user demands for these areas. We also looked into the administrative designation of “Primitive Area” which was formerly applied to many undeveloped national forest system areas prior to their designation as Wilderness. This is apparently not a good solution for us at the moment. Finally, we think that the range of alternatives provided in this analysis gives our decision makers a number of differing management scenarios for roadless areas and information on the effects associated with those choices.

#### Wilderness Management

##### Wilderness Management General

**936. The Wasatch-Cache National Forest should clarify how wilderness areas will be managed.**

**Response:** Between the Draft and Final EISs Appendix VI was expanded to include standards and guidelines all Wilderness areas on the Wasatch-Cache. Similarly, the Desired Future Conditions statements for Wildernesses along the Wasatch Front were expanded considerably to clarify public and agency expectations for their future management.

**937. The Wasatch-Cache National Forest should manage wilderness areas for non-degradation.**

**Response:** This concept is a fundamental premise for managing Wilderness which goes back to the Wilderness Act (1964) and is carried forward in the revised Forest Plan through the forestwide DFC for Designated Wilderness and Standards and Guidelines, as well as management area DFCs that address Wildernesses and

individual Wilderness goals, standards and guidelines. Additional direction available outside this forest plan on managing Wilderness for non-degradation is identified at the beginning of the section on forestwide Wilderness standards and guidelines in Chapter 4. A. 3. of the revised Forest Plan.

**938. The Wasatch-Cache National Forest should manage lands as wilderness during the current Administration.**

**Response:** The range of alternatives provided in the FEIS provides choices with projected effects for managing the roadless areas on the Wasatch-Cache. Our decision makers will review and document their decisions carefully for the long term good of these lands and to serve the needs of the American people.

**939. The Wasatch-Cache National Forest should prepare wilderness management plans in a timely manner.**

**939.1 For the Tri-Canyon wilderness**

**939.2 For the Uinta Wilderness**

**939.3 For the Mount Naomi Wilderness**

**Response:** In the proposed Forest Plan that was produced with the release of the DEIS in May 2001 a schedule of wilderness management planning was identified as an objective. This objective is not present in the revised Forest Plan that is being released now. Forest leadership looked at the list of potential Forest Plan related objectives, and then prioritized that work and developed the current objectives (See Chapter 4.A.3.) While active management of Wilderness is a high priority for our work, no specific commitment to Wilderness planning is now made. If future funding or reprioritization of work and management emphasis on Wilderness planning surfaces, this is indeed a possibility.

Recognizing this change from the DEIS and proposed Forest Plan of 2001, the revised Forest Plan provides additional management direction for the six Wildernesses along the Wasatch Front in Appendix VI to help meet the need for management direction for these Wildernesses. Additional detail in Desired Future Conditions statements for these Wildernesses was also completed to give managers and the public ideas for their management.

**940. The Wasatch-Cache National Forest should restrict access to wilderness areas by implementing a permit system.**

**Response:** The comment suggests a permit system for heavily used areas of the High Uintas Wilderness, citing the Kings Peak area on holidays as overly used. While we know that these situations occur, particularly in some areas, this forest planning process did not analyze this question, and it was not raised as a driving issue during revision. Standards and guidelines for the High Uintas, as well as for the other Wildernesses on the Wasatch-Cache (See Chapter 4 and Appendix VI), provide direction that could be used limit or redistribute use for resource protection and recreational solitude.

**941. The Wasatch-Cache National Forest should use language in the Wilderness Act, which calls for no motorized vehicles, to guide wilderness management.**

**Response:** Motorized uses are not allowed in designated Wilderness, as required by the Wilderness Act and any subsequent regulations or policy. Our management prescriptions also prescribe that using motor vehicles or other motorized equipment is not allowed as stated in the 1964 Wilderness Act.

**942. The Wasatch-Cache National Forest should clarify that wilderness means non-management.**

**Response:** The fact that management in Wilderness is non-traditional, that is, it is done with a minimum tool philosophy and without motorized equipment and other conveniences normally available out side the Wilderness, does not mean that Wilderness is not managed. Contrarily, substantial attention and funding are spent on managing Wilderness so that it can meet the intent of Congress, the administration and the American people. Development does not necessarily mean management.

Adequacy of Analysis

**943. The Wasatch-Cache National Forest should require that any land recommended for wilderness pass a manageability and suitability test.**

**Response:** Part of the evaluation done for each roadless area in Appendix C-1 of the FEIS is an evaluation of these characteristics. The FS Handbook on Wilderness Evaluation (1909.12, Chapter 7) discusses these attributes under section 7.21 Capability regarding “suitability” and section 7.22 Availability regarding “manageability” and our appendix includes these considerations. “Need” is another criterion that is identified in that FS Handbook chapter and it is also evaluated for each roadless area.

**944. The Wasatch-Cache National Forest should provide data to justify its claim that snowmobiling on the outer 42 percent of the Lakes Roadless Area precludes its designation as wilderness.**

**Response:** We determined that the outer portion of the Lakes roadless area, (approximately 42% of it) was more used and more popular for snowmobiling than the remaining inner core of the area. We made this determination by interacting with members of the snowmobiling community and developing a map of snowmobile use there based on these interactions. The resulting map was reviewed and adjusted by Forest and Ranger District specialists and converted into a GIS layer to develop the information.

The fact that the outer portion of the Lakes area is used by snowmobiles does not preclude it from recommendation as Wilderness. This was one factor among many in the consideration of the area and in the development of the alternatives that are presented in the FEIS.

**945. The Wasatch-Cache National Forest should correct inaccuracies in the Forest Plan regarding inventoried roadless areas.**

**Response:** The Mt. Logan Roadless area identified in the roadless inventory done in 1983 was split into three different roadless areas for the 1999 roadless inventory: Mt Logan North, South and West roadless areas. Mapping criteria changed between the 1983 and 1999 inventories so that the Providence and Millville Canyon roads are now considered roads and dividers between the areas. During the last decade or more, the condition of these roads has actually deteriorated, although use of the roads may have increased due to improved and more abundant 4WD and ATV vehicles and users.

Wilderness Designation General

**946. The Wasatch-Cache National Forest should consider public demand for wilderness areas.**

**Response:** The forest is sensitive to public opinions regarding demand for and opinions against recommending more Wilderness, but the determination and decision to recommend is not based on a poll, referendum, or other counting of public opinion on the matter. Lands must first be evaluated using the criteria outlined in Appendix C-1 to the FEIS and have substantial capability, availability and need. After this some sensing of public demand, need or opinion is also appropriate in developing a decision. Information on public opinion related to roadless area evaluation for Wilderness is included in Appendix C-1.

**947. The Wasatch-Cache National Forest should consider wilderness designation in the Rocky Mountain system at the national level.**

**Response:** The evaluation for Wilderness in Appendix C-1 does consider in the “Need” determination how a particular roadless area might add to the National Wilderness Preservation System. The Forest itself is constrained to planning for the lands within the Forest boundary, but it does compare to larger scales when considering what lands would be most needed in recommending more Wilderness.

**948. The Wasatch-Cache National Forest should make “sustaining wild ecosystems” the primary goal for designating wilderness.**

**Response:** The goals for Wilderness are primarily set forth in the Wilderness Act (1964), which include both protection of wild ecosystems and providing primitive human recreation opportunities and solitude. Our forestwide goal for Wilderness may not have ordered wild ecosystem protection and appropriate levels of human activity in that order, but the goal as written is not intended in any way to shortchange the protection of the wild setting for correct levels and types of human use. Both are intrinsic to the intent of the law.

**949. The Wasatch-Cache National Forest should carry out other actions before recommending any more areas for wilderness designation.**

**949.1 Enforce existing wilderness regulations**

**949.2 Provide good management and education**

**949.3 Explain the balance of resources and the needs of the people**

**Response:** All the items identified in this comment are important for successful land management and to ensure that future generations can have opportunities similar to our own. The revised Forest Plan identifies an objective for enforcement and education that is aimed precisely at this mark. It is clear to us also that achieving good compliance with special orders and improving backcountry behavioral standards is a key to good Wilderness management. Recommending additional Wilderness does come with a commitment to manage it.

Wilderness Criteria

**950. The Wasatch-Cache National Forest should clarify how wilderness recommendations are selected.**

**Response:** There is no cookbook or scorecard for how recommendations developed; rather judgment was used given the following inputs. Appendices C-1 and C-2 evaluate roadless areas from two different perspectives: 1) potential for Wilderness, and 2) roadless area values defined by the criteria. Some conclusions may be made about which roadless areas are more valuable as Wilderness by reading and comparing these write-ups. Chapter 2 in the FEIS describes how roadless area management would be handled in each alternative and the extent to which Wilderness recommendations were considered appropriate as part of an alternative theme. The interdisciplinary team and forest leadership then mapped the different alternatives using this information and personal and professional opinions about the areas and their best allocation.

**951. The Wasatch-Cache National Forest should apply the wilderness criteria correctly for the Twin Peaks, Mount Olympus, White Pine, and Mount Aire proposed additions.**

**Response:** The fact that recommendations for Wilderness were and can be made in one alternative and not in another has nothing to do with the intrinsic values of the lands in question. Rather the recommendation is based on the perspective of the alternative on how that land should be used. Final decision-making this Forest Plan, and perhaps at some future time, a Congressional Wilderness act designating more Wilderness are not linear, but complex process composed of many different sets of opinions and perspectives related to the same set of lands and the same social system. These complex sets of information and societal desires regarding the Wasatch-Cache have been boiled down into the issues and alternatives presented in the FEIS.

**952. The Wasatch-Cache National Forest should reexamine the criteria for wilderness evaluation and the underlying legislation.**

**Response:** The Forest Service has developed its Handbook on Wilderness Evaluation (1909.12, Chapter 7) to interpret relationships between the Wilderness Act (1964) and National Forest Management Act (amended 1982), and so to help planners and the public to work through the contentious process of wilderness recommendation. While the Wilderness Act does not specifically identify the



criteria used by the Forest Service in its Handbook on Wilderness Evaluation, the agency at the Washington Office level legally can and did develop this policy for implementing its responsibilities. Individual national forests are then charged with the tasks of implementing handbook direction, which can include some interpretation, but which should fall within the rubric of the policy. Reexamination of this policy will need to come from higher levels in the organization, and is outside of the scope of this planning effort.

**953. The Wasatch-Cache National Forest should not use sights and sounds to disqualify potential wilderness areas.**

**Response:** While the “sights and sounds” of adjacent developed areas are discussed for some roadless areas with regard to their potential for Wilderness, these were not used to veto or disqualify additions to existing Wildernesses. This information along with other inventoried characteristics and alternative theme was considered when developing wilderness recommendations across the range of alternatives. It is the overall consideration and judgment regarding the qualities for and impediments to further recommendations for Wilderness within an alternative context that determined its wilderness recommendation.

**954. The Wasatch-Cache National Forest should consider the capability, availability, and need of individual roadless areas in determining wilderness potential.**

**Response:** We did in Appendix C of the DEIS and Appendix C-1 of the FEIS. An array of alternative recommendations for Wilderness is presented in the FEIS.

**955. The Wasatch-Cache National Forest should recommend areas for wilderness designation under certain conditions.**

**955.1 If they are large enough to offer a wilderness experience**

**955.2 If they are at least 100,000 acres in size, so that prescribed fire can be effectively used as a management tool**

**955.3 If they are low-elevation areas**

**955.4 Only if they are in danger of exploitation**

**Response:** We appreciate your perspectives on what constitutes appropriate characteristics for Wilderness. These clearly are important considerations in developing good management for roadless areas. Generally largeness has been considered an important value in preserving of wildland ecosystems. We also are learning that allowing fire to approximate natural fire regimes should improve ecosystem conditions. We know that low elevation areas are not adequately represented in the National Wilderness Preservation System, and development and over-exploitation can disrupt or destroy natural systems. These factors are considered in the evaluation of roadless areas in Appendix C-2 and for Wilderness evaluation in Appendix C-1 to the FEIS.

**956. The Wasatch-Cache National Forest should not recommend areas for wilderness designation under certain conditions.**

**956.1 If it would detract from water production**

**956.2 If it prohibits grazing**

**Response:** The Wasatch-Cache recognizes the importance of water production from national forest lands. We also know how important grazing livestock can be to individuals and communities that depend on it. These two land uses are often discussed in the evaluation of individual roadless areas for Wilderness in Appendix C-2 in the FEIS, particularly in the describing “Availability” where the potential for conflict of Wilderness designation with existing uses is covered. Generally, Wilderness recommendation by the agency, or later, designation by Congress has had little effect of these aspects of forest use, and wilderness acts passed by Congress tend to “grandfather” these uses in.

**Do Recommend Roadless Areas for Wilderness Designation**

**957. The Wasatch-Cache National Forest should expand wilderness areas.**

**Response:** We recognize your perspective and have provided a range of alternatives in the FEIS, some with large areas of recommended Wilderness and some with no recommendation. The prescription maps that accompany the FEIS show where wilderness recommendations are made; the management prescription of 1.5, described in Chapter 4.B.1. of the Forest Plan described allowed and prohibited used in recommended Wilderness; and desired future condition statements give other information on how these areas might appear in the future.

**958. The Wasatch-Cache National Forest should recommend additional wilderness areas to achieve its stated objective**

**Response:** The comment suggests that the best way to meet forest concerns for the preservation of biodiversity is through recommending most roadless areas of the forest as Wilderness. While the biodiversity and viability issue is a key one identified in the FEIS (See Chapter 1, Issue 3), it is only one of several that drove the planning effort. Most of the other issues, aside from the one on roadless area management, had to do with human uses. The solution for the forest plan must be a balancing of appropriate levels of use with protection and sustainability of ecosystem functioning and components. Several choices for how this solution are laid out in the seven alternatives that are analyzed in the FEIS; different recommendations for additional Wilderness are provided as part of each alternative.

**959. The Wasatch-Cache National Forest should recommend additional wilderness areas for environmental reasons.**

**959.1 To link wilderness areas together**

**959.2 To protect ecological health**

**959.3 To protect watersheds**

**959.4 To protect biodiversity**

**959.5 To protect wildlife**

**959.6 To protect wildlife habitat**

**959.7 To protect threatened, endangered, and sensitive species**

**959.8 To protect golden eagles**

**959.9 To protect areas from the effects of mining and off-road vehicle recreation**

**Response:** Each of these comments has merit. The FEIS presents a range of alternatives from prescribing Wilderness recommendation for large amounts of roadless areas or to no recommendation for Wilderness. These recommendations are based on the values identified in Appendix C-1 matched with an alternative theme. Wilderness recommendation and if Congress acts, designation, can help protect each of the values itemized above. However, Wilderness recommendation is not the only answer. Values can also be protected with other management direction and prescriptions.

Roadless areas are also considered for maintenance of roadless area values or possible allowance of development. (See Appendix C-1 for an inventory of roadless values.) Your comments were considered in the development and analysis of the alternatives presented in the FEIS. Comments from people who do not share your values were also considered, helping to provide the range of alternatives we have analyzed.

**960. The Wasatch-Cache National Forest should recommend additional wilderness areas for social reasons**

**960.1 To allow research and education**

**960.2 To benefit future generations**

**960.3 To preserve the American spirit**

**Response:** The range of alternatives presented in the FEIS provides recommendations of considerable new Wilderness to no new Wilderness. It is true that Wilderness can be a setting for sustaining biodiversity that can benefit environmental appreciation, research, future generations, and the spiritual sense that Americans have that “wild places” still exist in our country and world. We recognized these concerns by building some alternatives that recommend most roadless areas for Wilderness or provide management prescriptions that do not allow much development. The range of alternatives also provides options for the development of some of these areas.

**961. The Wasatch-Cache National Forest should recommend additional wilderness for economic reasons to benefit the economy.**

**Response:** The Loomis and Richardson (2000), reference that is cited in this comment does provide information concluding that Wilderness designation can add economic value and social values to an area. Some of these economic benefits are more easily or tangibly estimated in dollar values. Our Appendix C-1 considers how available, capable and needed the roadless areas on the Wasatch-Cache are as additional Wilderness. Some considerations of ongoing uses that add dollars to the economy are addressed. Our economic analysis has not estimated the dollar value of ecosystem benefits, in part because this is not required in our regulations. We do recognize the tremendous value of stable watersheds that produce dependable water supplies, ecosystems with individual species and functional components intact, and wild landscapes that can help energize and invigorate our society either through

direct recreation or reflection on their very existence. These aspects of roadless areas and potential Wilderness recommendation were considered in presenting our range of alternatives.

**962. The Wasatch-Cache National Forest should recommend additional wilderness areas.**

**962.1 All roadless areas**

**962.2 Winter range areas**

**962.3 Damaged areas**

**Response:** We have examined all inventoried roadless areas for their potential as Wilderness. No alternative recommends that all roadless should be Wilderness. Our analysis in Appendix C-1 to the FEIS simply did not find that all roadless areas had qualities that made them available, capable, or needed enough to be recommended. Documentation of the roadless areas that are not considered appropriate under any of the analyzed alternatives is part of the planning file.

The values of winter range are important and are considered with respect to impacts from development, use and forage competition in Topic 2, Chapter 3 of the FEIS. Winter range was not specifically analyzed as a characteristic across all roadless areas for Wilderness consideration. It is true that some lower elevation portions of roadless areas that provide winter range could be protected through Wilderness recommendation. This same effect may be achieved by tailoring other management direction. For instance, protection of winter range on the forest could be more specifically addressed through the application of a 3.2 management prescription and a management area DFC specifying winter range protection, than through recommendation of additional Wilderness. The range of alternatives does encompass difference acreages of roadless that are recommended for Wilderness, some of which would provide more winter range in recommended Wilderness than others; this has not been calculated.

Roadless areas with minor damage to vegetation or other attributes were considered for their potential as Wilderness and that analysis is presented in Appendix C-1. In some alternatives, areas with known minor damage were included in recommendations for Wilderness while they were considered inappropriate in other alternatives. We recognize that some healing of areas can occur when passive management and low impact uses are applied to an area, and that for some advocates of Wilderness, recommendation of these areas for Wilderness for curative reasons could seem appropriate.

**963. The Wasatch-Cache National Forest should support the wilderness designations proposed by various groups.**

**963.1 Salt Lake City**

**963.2 The Salt Lake City Department of Public Utilities**

**963.3 Save Our Canyons**

**Response:** The recommendations of these three entities are on file with the Wasatch-Cache, and they were considered in the development of the alternative

Wilderness recommendations that were presented in the FEIS. Each of the three presented positions recommending large acreages of roadless in the Tri Canyons as Wilderness. These positions are probably best represented in Alternative 1 and secondarily by Alternative 2.

**964. The Wasatch-Cache National Forest should designate the forest as a National Preserve and Wilderness.**

**Response:** This suggestion was not feasible, and not considered with the range of alternatives that were analyzed. The Forest simply has too many developed areas, and too many ongoing uses on which surrounding communities are dependent to preserve the whole or designate it as Wilderness.

**965. The Wasatch-Cache National Forest should create non-motorized buffer zones around all wilderness areas to protect ecological and wilderness values.**

**Response:** Section 303 of the Utah Wilderness Act of 1984 specifically prohibits the placement of buffer zones around Wildernesses designated in the act (all but Lone Peak). This section of the act further states, “The fact that nonwilderness 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.”

Do Not Recommend Roadless Areas for Wilderness Designation

**966. The Wasatch-Cache National Forest should not recommend any more areas for wilderness designation.**

**966.1 Because enough area is already designated wilderness**

**966.2 Because 80 percent of Utah is already owned by the federal government**

**966.3 Because these areas should be kept open to multiple use**

**966.4 Because a wilderness designation does not prohibit private landowners from using their land in a manner that is incompatible with wilderness values**

**Response:** We understand the perspective of commenters who do not want additional Wilderness recommendations, and have provided Alternatives 4 and 5 that cover this position. Other members of the public feel that some or much more additional Wilderness is desirable, and we have also presented alternatives that address these positions.

The Wasatch-Cache recognizes that large portions of the state are public lands (federal, state, and local), and that we must responsibly manage that portion which has been entrusted to our care.

Wilderness management is multiple-use management. Many different uses are allowed in designated Wilderness, and framers of Wilderness legislation had to consider how the intent of Wilderness could be interwoven with the intent of the Multiple-Use Sustained-Yield Act of 1960. Section 4 (a) (1) of the Wilderness Act of 1964 states “Nothing in the Act shall be deemed to be in interference with the purpose for which national forests are established as set forth in the in the Act of

June 4, 1897 (30 Stat. 11), and the Multiple-Use Sustained-Yield Act of June 12, 1960 (74 stat. 215).”

We recognize that private landowners can do as they like (within legal limits) with their own property, which may be adjacent to designated Wilderness or adjacent to roadless areas that must be considered for potential Wilderness. We considered this factor as we wrote Appendix C-1 and the alternatives in the FEIS.

**967. The Wasatch-Cache National Forest should not recommend any more areas for wilderness designation for environmental reasons.**

**967.1 Because these areas can be adequately protected with careful stewardship**

**967.2 Because a wilderness designation precludes management tools needed for forest health**

**Response:** We recognize your perspectives regarding Wilderness recommendation. We have alternatives presented in the FEIS that both recommend substantial Wilderness additions (Alternatives 1, 2, 3, 6, and 7) and recommend none (Alternative 4 and 5). It is true that many of the natural and social/recreational values of an area can be protected without a Wilderness recommendation, and that the application of “minimum” tool philosophy to Wilderness management can limit the use of some technology for work in an area. It is, in part, because of your perspective that we have developed a range of alternatives for managing roadless areas and in our Wilderness recommendations.

**968. The Wasatch-Cache National Forest should not recommend any more areas for wilderness designation for social reasons.**

**968.1 Because areas should remain open for future generations**

**968.2 Because motorized access is needed for the elderly**

**968.3 Because it would restrict recreational access**

**Responses:** There is a range of opinions among the elderly, those with disabilities, and all the public regarding motorized access to national forest lands and Wilderness recommendations. Your comments that suggest motorized or otherwise assisted access into areas is an important value to the public were considered in the development of alternatives for Wilderness recommendations.

**969. The Wasatch-Cache National Forest should not recommend any more areas for wilderness designation for economic reasons because wilderness designations hurt the economy.**

**Response:** We recognize your perspective that more Wilderness will hurt the economy through lessening use and sales of ATVs, snowmobiles, or other motorized recreation outdoor equipment. We also have recognized that the motorized recreation segment of local economies is “an important contributor to local businesses.” (FEIS, Chapter 3, Social and Economic section.)

Our range of alternatives includes those that recommend more Wilderness and some that do not. Additionally, Alternative 7 provides that snowmobiles can be used in

recommended Wilderness if existing travel plans allowed winter motorized snowmobile use. The Social and Economic section in the FEIS specifically includes in the analysis within recreation labor income and employment those sectors of the economy that make up motorized recreation (ATV and snowmobile, 4 wheel drive and gasoline sales), as well as other related components of recreation. Consequently, we think that the range of alternatives and their effects have considered your concerns.

**970. The Wasatch-Cache National Forest should not create de facto wilderness areas.**

**970.1 By adding more restrictions to proposed roadless areas**

**970.2 By managing recommended wilderness areas for wilderness values**

**Response:** Within our range of alternatives there are different allowed activities prescribed for recommended Wilderness. Chapter 2 in the FEIS itemizes the allowed activities possible in MPC 1.5, Recommended Wilderness. Alternative 1-6 tend to be about the same with regard to managing 1.5; Alternative 7, developed after comments were received on the DEIS has somewhat different allowances (including snowmobile access where it existed before recommendation) both for the public and for Forest Service management. Alternative 7 management prescriptions for 1.5 were developed, in part, with your concerns in mind.

Site-Specific Wilderness Recommendations

**971. The Wasatch-Cache National Forest should recommend additional wilderness areas.**

**Response:** We recognize that many people support recommending a large amount of additional Wilderness. Alternative 1 recommends the most Wilderness (See FEIS, Chapter 3, Topic 5), but additional Wilderness is recommended in 5 of our 7 alternatives.

**972. The Wasatch-Cache National Forest should recommend additional wilderness areas in the Bear Management Area.**

**Response:** No Wilderness is recommended in the Bear Management Area under any Alternative. Consideration of the values for Wilderness presented in Appendix C-1 to the FEIS for capability, availability, and need of additional Wilderness in the Swan Creek, Rock Creek-Green Fork, and Sugar Pine roadless areas was relatively low for a variety of reasons. Please review FEIS Appendix C-1 for further information.

**973. The Wasatch-Cache National Forest should recommend additional wilderness areas in the Cache Box Elder Management Area.**

**973.1 Areas Adjacent to Mount Naomi**

**973.2 Areas in Logan Canyon**

**973.3 Water Canyon**

**973.4 Wellsvilles**

**Response:** Alternatives 1 and 2 provide substantial Wilderness recommendations for Mt. Naomi Wilderness and some smaller additions in the Wellsville Mountain Wilderness. Other alternatives provide less or none. The details of these choices and effects are considered in the FEIS under Topic 5 in Chapter 3.

**974. The Wasatch-Cache National Forest should recommend additional wilderness areas in the North Wasatch Ogden Valley Management Area.**

**974.1 Mollens Hollow**

**974.2 Areas near Ogden**

**974.3 Burch Creek**

**974.4 Francis Roadless area**

**974.5 Upper South Fork**

**974.6 Lewis Peak**

**974.7 Areas surrounding the Bonneville Shoreline Trail**

**Response:** We inventoried and considered the values for Wilderness of each of these areas in Appendix C in the DEIS (Appendix C-1) in the FEIS. Each of the commenters suggested that some or all of these areas could be recommended as Wilderness. The Forest Plan revision interdisciplinary team looked at each area again to consider their character and see if Wilderness recommendation might be appropriate. Upper South Fork Roadless is recommended for Wilderness in several Alternatives. Additional recommendations for Wilderness were made in Alternative 1 (changing the management prescription map) beyond what was provided in the DEIS for Lewis Peak, and portions of the Willard and Francis roadless areas. The interdisciplinary team review of Mollens Hollow roadless area found that it was not appropriate for Wilderness recommendation under any of the Alternatives. In the development of Alternative 7, the values for Wilderness of these areas were also considered, and while these areas were not recommended for Wilderness in the alternative, substantial portions of them were placed in MPC 2.6, Undeveloped Areas. A review of the MPCs in Chapter 4 of the Forest Plan or Management Prescription maps for Alternatives 1 and 7 from the DEIS and FEIS allows one to review these situations.

**975. The Wasatch-Cache National Forest should recommend additional wilderness areas in the Central Wasatch Management Area.**

**975.1 Tri-Canyon Area**

**975.2 Twin Peaks**

**975.3 Gobbler's Knob**

**975.4 Mount Aire**

**975.5 Red Butte Canyon and Mueller Park**

**975.6 Grizzly Gulch**

**975.6 Lone Peak**

**Response:** As mentioned in response 974 above, we inventoried and considered the values for Wilderness of each of these areas in Appendix C in the DEIS (Appendix C-1) in the FEIS. Each of the commenters suggested that some or all of these areas could be recommended as Wilderness. The Forest Plan revision interdisciplinary team looked at each area again to consider their character and see if Wilderness



recommendation might be appropriate. All mentioned areas are within the general Tri-Canyon area of the Salt Lake Ranger District.

Most of Twin Peaks roadless area is recommended for Wilderness in Alternative 1, and smaller portions in Alternatives 2 and 3. So this area has been considered as Wilderness in the revision process.

Gobbler's Knob is found within part of the Mt. Olympus roadless area, and this portion of the roadless area is recommended for wilderness in Alternatives 1, 2, and 3. Consequently, there has been consideration of this area as Wilderness in the revision process.

Most of the Mt. Aire roadless area was recommended for Wilderness in Alternative 1. Other alternatives did not recommend it. The area is generally perceived as marginal potential for Wilderness given presence of substantial Wilderness already in the general area and other factors. Appendix C-1 to the FEIS reviews its potential for Wilderness.

Red Butte and Mueller Park roadless areas were added to the roadless inventory since the DEIS as a result of this comments, and considered for their values as potential Wilderness or for roadless area values. (See Appendices C-1 and C-2.) The review of Red Butte and Mueller Park roadless areas determined that neither was appropriate for Wilderness recommendation under any alternative.

Grizzly Gulch, near Alta ski area, is primarily composed of private lands, is not in an inventoried roadless area, and is not capable, available, or needed as an addition to Wilderness.

Additions to Lone Peak Wilderness are considered in Alternatives 1 and 2. See Appendices C-1 and C-2 to the FEIS.

**976. The Wasatch-Cache National Forest should recommend the proposed Mount Olympus wilderness addition.**

**Response:** Alternative 1 in the FEIS considers and recommends most of the Mt. Olympus roadless area as Wilderness. Two other alternatives (2 and 3) recommend about 20% of the roadless area be added as Wilderness. We understand that proponents of watershed protection, wildlife species and habitat, threatened vegetation, and non-motorized summer and winter recreation have a stake in this perspective (as do the values and species they represent), and we have considered these positions in our FEIS.

**977. The Wasatch-Cache National Forest should exclude certain areas from the proposed Mount Olympus wilderness addition.**

**Response:** A range of alternatives is presented in the FEIS in Chapter 3, Topic 5 that recommends most of the Mt. Olympus roadless area as Wilderness in Alternative 1, to recommending none of it in 4 alternatives. The decision maker for

this roadless area has been given a broad range of alternatives and effects to consider in making a decision, and your position has been identified within this range of alternatives.

**978. The Wasatch-Cache National Forest should recommend White Pine Canyon for wilderness designation.**

**Response:** White Pine roadless area is recommended for Wilderness in Alternatives 1 and 2. In five other alternatives it is not. Your opinion and the opinions of other are considered in the range of alternatives for this area.

**979. The Wasatch-Cache National Forest should not recommend White Pine Canyon for wilderness designation.**

**979.1 Because the area is already sufficiently protected**

**Response:** White Pine roadless area is not recommended for addition to Wilderness in five of the seven alternatives analyzed in the FEIS. With the exception of comment 979.2 and 979.5 above, we recognize the perspectives of the comments above, and have considered them through these alternative treatments.

**979.2 Because grazing and winter motorized use should be allowed to continue**

**Response For 979.2:** Grazing is not allowed under any Alternative. It must be noted that grazing is not now allowed in the White Pine area as it is within the Salt Lake City municipal watershed, and this use has not been allowed for many years; winter motorized use, through helicopter skiing is allowed in several alternatives (3-7), although it is not allowed in Alternatives 1 and 2.

**979.3 Because helicopter skiing should be allowed to continue**

**Response:** See response 979.1.

**979.4 Because the area contains too many roads and other improvements to be considered for wilderness designation**

**Response:** See response 979.1.

**979.5 Because it will prevent access to private inholdings**

**Response For 979.5:** Access to private inholdings must be allowed by law. The Forest Service cannot deny access to private property held within national forests. This is not a decision that is either within the authority of the Forest Service or within the scope of this forest plan.

**980. The Wasatch-Cache National Forest should recommend additional wilderness areas in the Stansbury Mountains Management Area, ie Stansbury Mountains and Deseret Peak Areas.**

**Response:** Our range of alternatives for wilderness recommendation in the Stansburys goes from recommending nearly all of the local roadless area for Wilderness in Alternative 1, to recommending none in four alternatives. The inventory of roadless areas for Wilderness values and roadless for other roadless area values is contained in Appendices C1 and C-2 respectively in the FEIS. Topic

5 in Chapter 3 of the FEIS discusses the alternatives for Wilderness recommendation and roadless values. The decision-maker has been given range of choices from which to build a decision for the area and the forest in general.

**981. The Wasatch-Cache National Forest should recommend additional wilderness areas in the Western and Eastern Uintas Management Areas.**

**981.1 Areas Adjacent to Lakes, and Uintas North Slope**

**981.2 Boundary Creek**

**981.3 Burnt Fork/Thompson Fork/Kabell Creek**

**981.4 Hayden Fork/Main Fork/Stillwater/Boundary Creek**

**981.5 High Uintas**

**981.6 Lakes Roadless Area/proposed Mount Watson Wilderness**

**981.7 Nobletts**

**981.8 Stillwater Creek**

**981.9 Middle Fork, Blacks Fork, and West Fork Beaver Creek**

**981.10 Widdop Mountain**

**Response:** Many commenters provided general and detailed support for recommendations of additional Wilderness in the Uintas Range. The itemized areas above were extracted from individual comments in of support for Wilderness recommendation for each area. The range of alternatives presented in the FEIS provides Wilderness recommendations of almost all of these roadless areas to Wilderness in Alternative 1, and lesser amounts in Alternatives 2, 3, 6 and 7. Detailed discussions of the values of these areas as Wilderness can be found in Appendix C-1 to the FEIS. Discussions of other values associated with their roadless character can be found in Appendix C-2. Our range of alternatives accounts for situations in which these values might be protected or might be placed under prescriptions where more development is allowed.

**982. The Wasatch-Cache National Forest should recommend the Mount Naomi Roadless Area for wilderness designation.**

**Response:** Most of the Mt. Naomi roadless area is recommended for Wilderness in Alternative 1. Alternatives 2, 3, and 6 also make recommendations for several 1000 acres, while Alternative 7 recommends 500 acres adjacent to recommended Wilderness on the Caribou National Forest. Two alternatives, 4 and 5, recommend no new Wilderness here or forestwide, satisfying those who have an opposite perspective on Wilderness recommendation from your own.

**983. The Wasatch-Cache National Forest should not base its needs assessment for additional wilderness solely on recreational criteria for the Mount Naomi Roadless area.**

**Response:** Alternative 1 recommends most of the Mt. Naomi Roadless area for Wilderness, and Alternative 2 recommends much of it. The analysis of the need for additional Wilderness analyzed in Appendix C of the DEIS for Mt. Naomi roadless area did have several references to the recreation values of the area, but it is clear in this inventory that significant wildlife and plants are present that are also considered

for potential as Wilderness. We think that the range of Alternatives covers the possibilities and analysis that you suggest.

**984. The Wasatch-Cache National Forest should extend wilderness designations back to the trailheads on every drainage across the North Slope.**

**Response:** The range of alternatives developed in the FEIS encompasses situations in which larger recommendations for Wilderness would extend wilderness to existing trailheads. If large new Wilderness recommendations (Alternatives 1 or 2) or even smaller recommendations are decided on (Alternatives 3, 6, or 7) local implementation decisions for managing at the edges and interiors of new recommended Wilderness will need to be made. Site-specific management at trailheads, essentially requiring Wilderness behaviors and uses from trailheads to Wilderness boundaries might also be a solution to your concern.

## **Topic 6: Suitable Timberlands**

### **Suitable Timberlands General**

**985. The Wasatch-Cache National Forest should modify the standards and guidelines related to timber management.**

**985.1 To define and further develop “standard restrictions”**

**985.2 To protect scenic river eligibility**

**985.3 To establish a skidding prohibition at a lower slope than 40 percent**

**985.4 To close loopholes for timber sales in Guidelines 58 and 59**

**985.5 To protect trails during timber sales and other vegetation management**

**Response:** The Forest Plan identifies general standards and guidelines that apply to all management prescriptions. Project level analysis will determine necessary management requirements based on site conditions, and will address protection of system trails, scenic river eligibility, and other resource values to be maintained or improved.

**986. The Wasatch-Cache National Forest should clarify timber management prescriptions in the Forest Plan by including species-specific road density requirements and management direction.**

**Response:** Species-specific road densities is impractical when one considers the 300+ vertebrate species that may use the Forest. Chapter 3, Topic 3, and Appendix B5 in the FEIS discuss roads analysis and densities, as does Topic 3 in the Revised Forest Plan.

**987. The Wasatch-Cache National Forest should require the timber industry to restore harvested areas.**

**Response:** Post-sale activities and requirements/restrictions on logging activity are determined during the analysis conducted under NEPA. The contract provisions are selected to insure that the identified requirements are implemented on the ground during the term of the contract. Timber sales are monitored during the term of the contract to insure the purchaser is in compliance with contract specifications.

**988. The Wasatch-Cache National Forest should scientifically manage vegetation resources to ensure restoration of biodiversity.**

**Response:** Each alternative addresses vegetation management with a combination of mechanical treatments and the use of prescribed fire. Restoring biodiversity is an objective of most alternatives, but the method used for restoration varies between alternatives. Harvest will be used in some areas, but where harvesting is restricted by physical, biological or management constraints, prescribed fire is the primary tool to restore biodiversity.

**989. The Wasatch-Cache National Forest should review timber suitability per the Alternative 7 management prescription category.**

**Response:** Timber suitability analysis has been conducted in accordance with planning regulations and is included in Appendix B.

**990. The Wasatch-Cache National Forest should consider alternatives to timber harvesting to keep roadless areas intact.**

**Response:** Thank you for your comment. Roadless areas are addressed in all alternatives. Preservation of all existing roadless areas is included in several alternatives (1,2,6), and the remaining alternatives protect roadless areas to varying degrees through the application of MPCs.

### **Adequacy of Analysis**

**991. The Wasatch-Cache National Forest should clarify existing tables and provide additional tables in the Final EIS that indicate “total suited acres” and “tentatively suited lands.”**

**Response:** Tables have been reviewed and we have attempted to make them more clear and correct inaccuracies. Table TM-2 Chapter 3) presents the suited acres and unsuited lands where timber harvest is allowed.

**992. The Wasatch-Cache National Forest should provide a more thorough analysis in compliance with the Forest Service Manual.**

**992.1 By providing sufficient analysis in the Final EIS**

**992.2 By using FORPLAN to calculate allowable sale quantity and long-term sustained yield**

**992.3 By providing sufficient information in the Forest Plan**

**Response:** Timber suitability and ASQ information has been reformatted in the Forest Plan to include additional information and in the format in the planning regulations. This information is included in Appendix B. The planning regulations do not require the use of FORPLAN, but require estimating the goods and services, activities, and investments to be implemented or produced by decade and display them.

**993. The Final EIS should provide a complete analysis of the cumulative effects of logging on threatened wildlife, including predators.**

**Response:** “Threatened and Endangered” are defined by law in the Endangered Species Act (ESA). The Forest has only one threatened predator species, the Canada lynx, and one endangered species, the black-footed ferret which is classified by the State and the U.S. Fish and Wildlife Service (FWS) as being historical on the Wasatch-Cache (and all other areas of the State except the Uintah Basin where it has recently been reintroduced. All Federally listed, candidate, and proposed species that the FWS has identified for the Forest are discussed in the Biological Assessment as required by the ESA and under species-at-risk in Appendix B2 of the FEIS.

**994. The Final EIS should disclose the adverse effects of timber sales on atmospheric carbon levels in order to comply with the Global Climate Change Prevention Act.**

**Response:** The Global Change Prevention Act directs the Secretary of Agriculture to study global climate change and its affect on farms and forests in the United States, and to identify alternative management strategies for temperate and tropical forests that may mitigate any negative effects of global climate change. The long-term effects of climate change are beyond the scope of this Forest Plan.

**995. The Wasatch-Cache National Forest should modify the discussion of timber suitability in the Final EIS.**

**995.1 By including more recent monitoring data**

**995.2 By describing timber supply and demand**

**995.3 By explaining what triggers a timber sale outside of the timber prescription or suitable base**

**Response:** There has not been a published monitoring report since 1992. However, resource monitoring at the project level has been ongoing since the report was issued. The most recent information from this monitoring was incorporated into the analysis. Quantifying the demand for timber is difficult because mills outside the local area are now purchasing timber from the Wasatch-Cache, and they are not totally dependent upon timber from this forest for their supply. We have tried to improve the timber demand discussion in an attempt to better describe the local market. There is no specific triggering mechanism for timber sales on unsuitable lands that permit timber harvest. The purpose for the proposed treatment would be identified in the project level analysis. Timber harvest on unsuitable lands could be proposed for several purposes, including but not limited to salvage of insect or fire-killed timber, maintenance or improvement of wildlife habitat, and development of PFC.

**996. The Wasatch-Cache National Forest should better explain statements regarding the possible benefits of tree removal on wildlife due to improved hunting opportunities.**

**Response:** This statement was in regards to oil and gas leasing. The section on “The Effects on Terrestrial Wildlife From Oil and Gas Activities has been rewritten and the statement is no longer in the document.

**997. The Wasatch-Cache National Forest should explain the connection between timber harvest and lynx management for each alternative.**

**Response:** Lynx conservation strategy guidelines specify that management activities shall not change more than 15% of a Lynx Analysis Unit to an unsuitable condition within a 10-year period. The greatest projected forest-wide harvest level (Alternative 5) is about 12,400 acres of suited lands in a decade. It is unlikely that this level of activity will exceed the conservation strategy limits for change in a decade. However, site-specific analysis will determine the effects of proposed harvest, and may dictate a reduction of treatment acres in a particular LAU. We have discussed this in more detail in the FEIS.

**998. The Wasatch-Cache National Forest should discuss timber harvest methods in the Final EIS.**

**998.1 To clarify the different impacts from fire and clearcuts**

**998.2 To clarify harvest methods for conifer, lodgepole pine, and aspen**

**Response:** The values for water yield in the DEIS are based on a model that predicts no reduction in water yield for 15 years after conifer harvest and then reduces the water yield to zero linearly from 15 to 60 years after harvest. After the DEIS was released for public comment, a different approach was felt to be appropriate for the assessment of water yield increases. Since Forest Plan revision is broad-level planning, it is felt that it is not appropriate to present specific values of water yield based on assumptions and research that was conducted in very small watersheds that may or may not apply to the Forest-level scale. Therefore, a different analysis presented that is discussed in the section Effects on Soil and Water Resources from Timber Harvest/ Vegetation Treatments under Topic 1, Watershed Health in the FEIS.

We agree the referenced harvest method statement is confusing. It has been reworded in the FEIS to clarify the meaning. Clearcutting is an even-aged silvicultural system, and may be appropriate for lodgepole pine stands and mixed conifer stands dominated by lodgepole pine. Uneven-aged systems will be the preferred system in spruce-fir and mixed stands dominated by spruce and fir. The purpose of clearcutting aspen is to initiate regeneration from root sprouts and provide for future mature stands. Mature aspen stands are very desirable and a major management emphasis is perpetuating such stands over time.

**999. The Wasatch-Cache National Forest should continue to research best management practices for timber harvest methods.**

**Response:** Research projects that investigate best management practices and other management options are conducted by Forest Service Research Stations on a continuing basis. At the Forest level, timber sale areas are monitored during and

after harvest to determine effectiveness of prescribed management practices. Adjustments in practices are made if monitoring indicates changes are warranted.

**1000. The Wasatch-Cache National Forest should further study aspen ecology before continuing to clear-cut to understand the long-term effects and regrowth potential of aspen.**

**Response:** Past aspen regeneration treatments have been monitored periodically to measure response to the treatments and growth of aspen. A considerable body of information pertaining to aspen management has been developed through research and is reviewed during analysis process. We recognize that some aspen stands are self-sustaining; our focus is on treatment of those stands that are in the process of conversion.

**1001. The Final EIS should include a map of suitable timberlands which was not provided in the previous plan.**

**Response:** Suitable timberlands are those forested lands within management prescriptions 5.2 and 6.2. They are mapped as such on alternative maps. This should make them more identifiable than is the case in the current plan.

**Allow Timber Harvest**

**1002. The Wasatch-Cache National Forest should allow timber harvest.**

**1002.1 With some areas protected for recreation**

**1002.2 For forest health**

**1002.3 With no restrictions based on protection of species not sited in the area**

**1002.4 With restoration considerations**

**Response:** Timber harvest is part of the Forest Service multiple use mission. Management prescription categories that define the management emphasis for an area of the forest were developed to provide a full spectrum of opportunities such as those mentioned. Recreation opportunities, forest health, protection of threatened, endangered and sensitive species habitat, and ecosystem restoration are among the many considerations in timber sale projects.

**1003. The Wasatch-Cache National Forest should allow public fuel wood collection.**

**1003.1 To reduce fire hazards, warm households, and finance maintenance backlogs**

**1003.2 To prevent waste of natural resources**

**1003.3 To help clean-up the forest**

**Response:** The Wasatch-Cache offers fuelwood to the public every year, but not necessarily on every Ranger District. The decision to offer or not rests with the individual Ranger Districts, and depends upon the availability of material to offer. The need for snags and down woody material for various wildlife species and other considerations will influence whether fuelwood permits will be offered, where fuelwood cutting will be allowed, how many permits to offer, and when to offer them.



## **Not Allow/Restrict Timber Harvest**

### **1004. The Wasatch-Cache National Forest should limit timber harvest.**

**1004.1 To preserve forest health, improve habitat, reduce fuels, and support water output**

**1004.2 To protect wildlife**

**Response:** Timber harvest is part of the multiple use mission of the Forest Service. Timber harvest from suitable lands may be based on economic reasons. All sales from other lands are for other than economic purposes, such as habitat improvement and fuels reduction. Alternative 2 addresses the concern that harvesting be limited to non-economic purposes.

### **1005. The Wasatch-Cache National Forest should prohibit timber harvest.**

**1005.1 Until it completes a proper accounting of timber harvest costs**

**1005.2 Because of its low economic value in comparison with amenity values**

**1005.3 To protect the recreational value of the forests**

**1005.4 To protect the scenic and biologic value of the forests**

**1005.5 To eliminate damage from timber harvest**

**Response:** The multiple use mission of the Forest Service provides a variety of goods and services from National Forest lands. The Forest Plan identifies a resource emphasis for a given area by means of the management prescription categories. These MPCs provide a mix of uses and identify those areas where timber harvest is appropriate, and those areas where it is not. Although there is no requirement that Forest Service timber sales provide a net return to the Treasury, we do consider the economics of timber in the sale planning process.

### **1006. The Wasatch-Cache National Forest should prohibit timber harvest in roadless areas.**

**1006.1 To allow natural forest processes to dominate**

**1006.2 To preserve ecosystem values**

**1006.3 To protect forest ecosystems from fragmentation**

**1006.4 To protect wildlife**

**1006.5 To preserve roadless values**

**Response:** The FEIS includes Alternative 1 which allows no timber harvest, and Alternatives 2 and 6 which allow no timber harvest in roadless areas. The environmental effects of these alternatives are displayed in Chapter 3 of the FEIS. See FEIS Chapter 3 within the Topic for Roadless areas for a display of how each alternative affects roadless areas.

### **1007. The Wasatch-Cache National Forest should prohibit timber harvest in roadless areas on the North Slope.**

**Response:** We recognize the importance of roadless areas for all of the above values. The plan approaches the decision on disposition of roadless areas by providing a range of protection depending upon alternative, including preserving all existing roadless.

**1008. The Wasatch-Cache National Forest should not use clear-cutting as a timber harvest method.**

**Response:** The widest range of options should be available to meet management objectives. Clearcutting is an acceptable harvesting system for some species under certain conditions. However, whenever clearcutting is prescribed for a stand, it must be the optimum method of achieving objectives and the reason for its use disclosed in the project analysis.

**1009. The Wasatch-Cache National Forest should stop using the unscientific concept of forest health to justify its timber commodity program and recognize that insects and disease play vital roles in ecosystem integrity.**

**Response:** We agree that insects and disease play vital roles in ecosystem integrity. However, the decision on whether or not to treat a stand is based on multiple use objectives. Timber harvest may be an effective method to maintain other resource values that may be adversely affected by extensive insect and disease caused mortality.

**1010. The Wasatch-Cache National Forest should not use the threat of insects and disease as an excuse to timber harvest.**

**Response:** Harvesting is proposed to develop stand conditions that meet management objectives, including PFC. While endemic levels of insects are not destructive, and may in fact be beneficial, large-scale epidemics can affect the desired condition for the forest, and adversely affect other resources such as recreation and wildlife. In such cases, harvest can have a role to play in achieving the future condition.

**1011. The Wasatch-Cache National Forest should not allow timber harvest levels to exceed regenerative capacity.**

**Response:** We agree. Care is taken during the planning process and preparation of the silvicultural prescription, as well as during the implementation and post-sale phases to ensure adequate regeneration is established following harvest.

**Insects and Disease**

**1012. The Wasatch-Cache National Forest should not have a policy of keeping spruce beetle activity at an endemic level.**

**Response:** Thank you for your comment. Decisions on whether to treat insect outbreaks are made based on the anticipated impacts on many forest resources. Response will vary depending upon location and severity of the outbreak, and the threat to forest resources.

**1013. The National Forest should not use synthetic herbicides and insecticides for pest management.**

**Response:** Thank you for your comment. We feel that we should have a full range of options available to address the range of disturbances that are experienced across the Forest, and the range of treatment options is reflected in the alternatives.

Herbicides and insecticides can be effective tools to protect high value trees in campgrounds and to control noxious weeds. When used, they are applied directly to the plant to be controlled (in the case of noxious weeds) or the tree to be protected (in the case of campgrounds), to maximize effectiveness and minimize potential effects to non-target species.

## **Topic 7: Rangeland Capability, Suitability, and Forage Production**

### **Rangeland Capability, Suitability, and Forage Production General**

**1014. The Wasatch-Cache National Forest should develop improved livestock grazing strategies in the final Forest Plan to improve riparian habitats.**

**Response:** We have identified in Appendix VII of the Forest Plan, riparian classes for streams addressed in the Wild and Scenic River evaluation for the Forest. Those classes are managed to specific desired conditions and utilization standards. In addition, we have added a new forage utilization guideline (G70) for rangelands in unsatisfactory condition (not meeting or moving toward forest plan objectives).

**1015. The Wasatch-Cache National Forest should not give grazing a special status in the Forest Plan.**

**Response:** Please see response to concern statement 61. NFMA regulations call for specific decisions to be made regarding grazing on the Forest. We feel that a full spectrum of uses are provided for in the revised Forest Plan through the establishment of an array of desired future conditions, goals, objectives, standards and guidelines that help us manage for many different uses across the forest.

**1016. The Wasatch-Cache National Forest should adopt the Gunnison sage grouse guidelines for grazing areas to promote recovery and restoration of sage grouse habitat.**

**Response:** A minor amount of sage grouse habitat occurs on the Wasatch-Cache National Forest and the Gunnison sage grouse guidelines are specific for a subspecies of sage grouse that do not occur on the Forest. Broader guidelines for managing sage grouse habitats (Connelly and others) are incorporated by reference.

### **Adequacy of Analysis**

**1017. The Wasatch-Cache National Forest should adequately analyze the impacts of livestock grazing.**

**1017.1 By analyzing environmental and economic impacts**

**1017.2 By analyzing site-specific impacts**

**1017.3 By analyzing whether grazing forecloses other forest uses**

**1017.4 By documenting the rate of aspen decline**

**Response:** The environmental effects of grazing are disclosed under various resource topics in Chapter 3 of the FEIS and the economic impacts to permittees are provided in the Social Impacts Analysis portion of Chapter 3. These analyses have

been reviewed and in many cases updated and expanded upon in the FEIS. Site-specific analyses are outside the scope of the Forest Plan. A section titled “Alternative Uses Foregone” has been added to the FEIS. A discussion on the rate of aspen decline has been added in Chapter 3 of the FEIS under Topic 2, Biodiversity and Viability, Vegetation. It describes the variety of factors involved with aspen decline, including fire suppression and livestock grazing.

**1018. The Wasatch-Cache National Forest should analyze the effects of livestock grazing against the economic benefits.**

**Response:** The effects of livestock grazing are outlined in Chapter 3, Topic 7 – Rangeland Capability and Suitability, Livestock Grazing/Range Management. The cost for grazing an animal unit month (AUM) is set by Congress, as is our budget to manage livestock use on the Forest. While economic suitability is one factor in determining rangeland suitability, it is the ecological conditions of the land that are more heavily determine whether or not to graze and how much grazing should occur, not the economics of livestock grazing.

**1019. The Wasatch-Cache National Forest should clarify the relationship between animal unit months and terrestrial conditions.**

**Response:** Livestock use is allowed on suitable rangelands as long as those lands are at, or moving toward desired conditions. These conditions focus on the long-term sustainability of uses on rangelands and the ability to maintain quality watershed conditions, wildlife habitat, and a variety of age classes within those vegetation types.

**1020. The Wasatch-Cache National Forest should clarify its discussion of permitted grazing levels in the Draft EIS.**

**Response:** While at the forest-wide scale we can address permitted numbers based on existing and historic use levels, the detailed analysis to revise these numbers up or down is beyond the scope of this analysis. We have estimated the effects of the different alternatives, however, and these are shown in the revised Table RN-2.

**1021. The Wasatch-Cache National Forest should justify its rationale for only closing three allotments in the Preferred Alternative.**

**Response:** Five additional vacant allotments are closed in the Salt Lake and Davis County watersheds in the decision alternative (Alternative 7), for a total of 10 of the 13 vacant allotments closed. The other three have not been closed because of the potential to restock them and/or to use them while other allotments are being treated with prescribed fire or wildland fire use.

**1022. The Wasatch-Cache National Forest should verify rangeland condition and trend by using verified conditions, not estimates.**

**Response:** The Forest has followed accepted protocols in the assessment of range conditions, using both verified and estimated condition techniques. Because of the vast numbers of acres of rangelands in allotments across the Forest (98 allotments

covering over 300,000 capable rangeland acres), it is not possible to verify conditions annually on all allotments.

**1023. The Wasatch-Cache National Forest should provide maps indicating suitable and capable acres for livestock grazing so that better grazing capability determinations can be made.**

**Response:** Maps showing the locations of allotments on the Forest have been added to FEIS Appendix I. Maps are in the planning record that show the different factors used in rangeland capability and suitability analysis, the detail of which is too great to put into the EIS document. Capable acres and suitable acres of rangelands were determined using processes in the Rangeland Capability and Suitability Protocol (USDA Forest Service 2000) and outlined in FEIS Appendix B-9. As noted in this appendix, percent slope, minimum forage production, stable soils, ground cover, and access by livestock (including distance to water) were the factors used in determining capability. In addition, tables are available in FEIS Appendix I that illustrate which allotments are open by alternative and maps are provided that show where these allotments occur. Only those capable acres within these allotments are considered suitable.

**1024. The Wasatch-Cache National Forest should provide maps of vacant and used forest allotments including the three sheep allotments, which, if vacated, would benefit bighorn sheep, for reviewers to determine whether the proposed analysis is consistent with the location of the allotments.**

**Response:** Maps showing the location of each allotment on the forest are in Appendix I, which has been added to the FEIS. This appendix addresses current allotment status (open or closed) and allotment status by alternative as well.

**1025. The Wasatch-Cache National Forest should publish and distribute maps of grazing activity throughout the year so recreational users can avoid areas where livestock have damaged or closed recreational opportunities.**

**Response:** Because areas that are used at any given time during the grazing season may vary because of annual weather, soil moisture conditions, and rotation systems used on allotments, it would not be possible to accurately display this on maps in a meaningful and accurate way. Recreation users may call the District offices to receive information on where grazing is occurring and when.

**1026. The Wasatch-Cache National Forest should modify the VEG-1 table in the Final EIS to indicate deviations from historic range of variation related to stubble heights.**

**Response:** The forest uses stubble height as an indicator of when livestock should be removed from an allotment and does not relate it to historic ecological conditions of rangelands, which is better described by species composition, ground cover, and canopy cover of sagebrush species. Stubble height refers to the height at the end of the growing season. In some areas where early grazing occurs, these heights at the time that livestock leave a pasture may be less than the height identified in the utilization standard.

**1027. The Wasatch-Cache National Forest should scientifically determine the animal unit months to be produced from capable lands.**

**Response:** While animal unit months (AUMs) have been estimated for each alternative, the actual AUMs allowed to graze any given allotment is better determined through site-specific analysis that assesses, not only the forage production within an allotment, but also the areas actually used by livestock at the appropriate level of utilization.

**1028. The Wasatch-Cache National Forest should analyze fecal coliform and bacterial forms of contamination associated with livestock grazing in the Final EIS to protect water quality.**

**Response:** The effect of increased bacterial concentrations in water from fecal wastes of livestock has been included in the section Effects on Soil and Water Resources from Livestock Grazing under Topic 1 Watershed Health. Analysis of fecal coliform and other bacterial forms of contamination associated with livestock grazing is not appropriate in the FEIS because Forest Plan Revision is broad-scale planning and decides where livestock grazing is allowed. Site-specific water quality problems associated with livestock grazing should be addressed during allotment management plan revisions or during annual permit review process.

## **Legal Considerations**

**1029. The Wasatch-Cache National Forest should indicate compliance strategies with the Endangered Species Act with respect to livestock management.**

**Response:** A biological evaluation/biological assessment is on file for this Forest Plan revision, which includes effects on Threatened, Endangered, and Intermountain Region Forest Service Sensitive species. Effects from livestock grazing on these and other species at risk have been described in more detail in Chapter 3, Topic 2 – Biodiversity and Viability.

## **Rangeland Management**

### **Goals and Objectives**

**1030. The Wasatch-Cache National Forest should modify the grazing objectives in the Forest Plan.**

**1030.1 By completing riparian class assignments and utilization standards for all riparian areas on all allotments**

**1030.2 By modifying the period for range analyses to be applied to the monitoring scheme**

**1030.3 By analyzing potential increases in forage availability based on the range of potential rates of timber and fire prescriptions**

**Response:** While we have not completed riparian class assignments for all riparian areas of the forest, classes for many of the perennial streams and rivers of the Forest has been added to Forest Plan, Appendix VII. These classes were

determined through an interdisciplinary team process. Utilization standards for each riparian class are identified in the Standards and Guidelines section of the Forest Plan. Site-specific adjustments will be encouraged based on the results of on-going range analysis and monitoring. Timber and fire activities temporarily change the availability of forage and are not included in the analyses for grazing potential, because of their transitory nature. And while it is permissible to include such range in suitable acre calculations, permitted numbers are not adjusted accordingly at the forest-wide scale because of the difficulty in properly assessing these conditions over the long term. Changes can be made through additional site-specific analysis.

## Standards and Guidelines

### **1031. The Wasatch-Cache National Forest should modify standards and guidelines for ranges.**

#### **1031.1 By addressing what will be done with vacant allotments**

#### **1031.2 By establishing criteria for maintenance of ground cover, vegetation, and soil.**

**Response:** The disposition of vacant allotments is described in the Alternatives portion of the FEIS. Utilization and ground cover standards and guidelines are imposed wherever livestock grazing is permitted. These as well as identified desired conditions, goals, and subgoals provide direction for maintaining ground cover, desired vegetation, and watershed and soil conditions.

### **1032. The Wasatch-Cache National Forest should comply with state water quality standards within livestock allotments.**

**Response:** The WCNF is required by State law to meet anti-degradation requirements. The Forest Plan has many standards and guidelines that help to meet anti-degradation requirements such as those under sections Watershed Health and Biodiversity and Viability. The states of Utah and Wyoming make determination of whether waters are fully supporting beneficial uses or not. Utah has determined that the waters of the WCNF are fully supporting their beneficial uses except for those listed in Table WA-1. The only water body on the WCNF that is identified as impaired for fecal coliform is Emigration Creek of which Salt Lake County is expected to begin assessing in 2003. The FEIS recognizes that impacts from livestock grazing occurs and is described in the section Effects on Soil and Water Resources from Livestock Grazing under Topic 1 Watershed Health.

### **1033. The Wasatch-Cache National Forest should not rely on utilization standards to protect stream habitats.**

**Response:** Additional direction has been added to the plan (guideline, G74) that annual operating instructions (and/or Allotment Management Plans) should be evaluated and additional site-specific objectives defined if needed for one or more of five different parameters, including stream bank trampling on key reaches. The Wasatch-Cache National Forest follows the Society for Range Management position statement on utilization dated February 2002 and is quoted below from their web page, <http://uvalde.tamu.edu/jrm/jrmhome.htm>:

The Society for Range Management recognizes and endorses forage utilization and residue measurements as useful tools in rangeland monitoring, and acknowledges their value in land management. When used with other monitoring information, utilization can be employed to design and evaluate management decisions. These measurements, when properly timed and conducted using appropriate methods and sampling procedures, can be used as an aid in:

Analyzing distribution of animal use on a management unit.  
Interpreting cause and effect relationships for observed changes in resource attributes such as soil cover, species composition, residual cover, etc.  
Adjusting stocking rates and/or timing of grazing when used in conjunction with other monitoring information including: long term vegetation or habitat data, current and historical stocking records, precipitation records, etc.

Utilization and residue measurements are not management objectives. They are tools to be used with other information in evaluating whether desired resource conditions are being achieved.

Other tools we are using to look at riparian conditions are greenline trend data to assess the condition of the riparian communities immediately adjacent to the streams.

**1034. The Wasatch-Cache National Forest should select species to monitor to determine the prescribed utilization standards for livestock grazing.**

**Response:** – While we have suggested some species to monitor utilization, this can and should be modified on a site-specific scale to meet the definition of a key species. As defined, key species, will be indicator species, which show signs of utilization first, and are generally more sensitive to grazing pressures.

**1035. The Wasatch-Cache National Forest should require a minimum 8-12 inch stubble height for all upland perennial bunchgrasses at the end of the grazing or growing season.**

**1035.1 To protect ground nesting bird habitat**

**1035.2 Management Prescription Categories**

**Response:** The proper use of forage has been focused on the ability of the grazed plants to maintain their viability and to maintain protective ground cover. Habitat requirements for ground-nesting birds are highly variable, and while 8-12 inch stubble height may be advantageous to some ground nesting species, it may be detrimental to others.

**1036. The Wasatch-Cache National Forest should not renew grazing permits in the 4.x management prescription categories.**

**Response:** Grazing is not allowed in developed recreation sites, such as developed campgrounds and picnic areas.



**1037. The Wasatch-Cache National Forest should not allow grazing in Management Prescription Categories 2.x and 3.x to protect aquatic, terrestrial and watershed integrity.**

**Response:** – It was determined that livestock grazing was not incompatible with Wild and Scenic River status MPCs 2.1, 2.2, and 2.3). Grazing is currently not allowed in Research Natural Areas (MPC 2.4). Grazing does occur on the Mirror Lake Highway and in portions of Logan Canyon, both Scenic Byways (MPC 2.5), but is not incompatible with the values of these areas. Roadless Areas (MPC 2.6) have each been evaluated for the values they contain (FEIS, Appendix C-2). Special Interest Areas (MPC 2.7) were proposed only where existing livestock grazing did not interfere with the values of those areas. Streams and rivers with Bonneville or Colorado River cutthroat trout populations (MPC 3.1) have been classified as Class 1 streams (Forest Plan, Appendix VII), which have the most restrictive grazing management direction.

Suitability/Capability

**1038. The Wasatch-Cache National Forest should determine suitable and capable acres in the final Forest Plan.**

**1038.1 In compliance with Forest Service regulations and the National Forest Management Act requirements for defining suitability and capability**

**1038.2 Per the Management Prescription Category 7.0 changes**

**Response:** While the determination of both range capability and suitability were done in the draft EIS, capable range has been revised based on new information and suitable range acres have been revised to address specific concerns raised in public comments. These changes can be found in FEIS Appendix B-9, and in Tables RN-1 and RN-4 in FEIS, Chapter 3, Topic 7 – Rangeland Capability and Suitability.

**1039. The Wasatch-Cache National Forest should analyze the “economic consequences” and “alternative uses foregone” to determine range suitability.**

**Response:** See response 1017. Additional information on “alternative uses foregone” and “economic consequences” has been added to the FEIS, Chapter 3, Topic – 7 Rangeland Capability and Suitability under the **Direct and Indirect Effects by Alternative, Rangeland Suitability** section. The financial efficiency analysis and budgetary impacts associated with grazing are displayed in FEIS Appendix B9, Table B9-2.

**1040. The Wasatch-Cache National Forest should prohibit grazing on lands deemed unsuitable.**

**Response:** Within any give allotment there are both lands considered capable and not capable, and therefore suitable and unsuitable for livestock grazing. Because of the complex nature of landscapes and associated management of these areas within allotments, capable or not, may be grazed by livestock because controlling livestock movements to that level is not possible. The acres of non-capable rangelands (see Appendix B-9), however, are not included in the determination of livestock grazing capacity on the forest.

**1041. The Wasatch-Cache National Forest should expand the lands deemed unsuitable for grazing to include the categories listed in the Rio Grande National Forest Land and Research Management Plan.**

**Response:** See response 1023. The Rio Grande National Forest was directed to reanalyze the suitability of their land base to support livestock grazing. Their new analysis used the newly developed Rocky Mountain Region Guidelines for Determining Grazing Suitability. We used the Intermountain Region direction that was available in June 2000 for assessing capability and suitability, but consulted with U.S. Forest Service, Rocky Mountain Region economists and adjusted our analysis to more closely follow the methods they recently used for the analysis for the Medicine Bow National Forest.

Conditions and Trends

**1042. The Wasatch-Cache National Forest should implement target range conditions.**

**1042.1 To ensure grass and browse for wildlife**

**1042.2 To allow for quick recovery of rangeland when it is not in properly functioning condition**

**Response:** Desired conditions have been outlined for rangelands. A new grazing utilization guideline (30 percent vs. 50 percent for lands in satisfactory condition) has been added for rangelands in unsatisfactory condition to improve and move toward properly functioning conditions.

**1043. The Wasatch-Cache National Forest should maintain conditions and trends and not yield to the current emphasis on utilization rates.**

**Response:** Utilization should not be confused with Desired Conditions. The forest follows the Society for Range Management (SRM) position on the use of forage utilization and residue measurements and uses utilization measurements with other monitoring information, to design and evaluate management decisions. We use the difference between desired and existing conditions and monitored trends to identify site-specific management needs to move toward desired conditions, which are described in the Forest Plan under “Desired Conditions – Biodiversity and Viability, Vegetation”. Utilization standards and guidelines, based on research, are used as a tool to maintain or reach desired conditions on the ground. We agree with the Society for Range Management (SRM) statement “Utilization and residue measurements are not management objectives. They are tools to be used with other information in evaluating whether desired resource conditions are being achieved” (SRM web page <http://www.srm.org>, last updated, February 2002).

**1044. The Wasatch-Cache National Forest should clarify whether it is using conditions and trends or utilization standards for grazing management.**

**Response:** See response 1043.

**1045. The Wasatch-Cache National Forest should conduct a trend analysis every three years.**

**Response:** The Rangeland Health Amendment, which is incorporated into this revised Forest Plan, identified measuring frequency for any given long-term trend study as once every 5 years. Because detectable differences cannot adequately be measured on a more-frequent basis, we will continue with this measurement frequency. There will, however, be trend studies being done every year in order to achieve this frequency on all allotments.

**1046. The Wasatch-Cache National Forest should use the Logan Ranger District as an example of good grazing conditions.**

**Response:** Example of good grazing conditions can be found across the forest. We have chosen to not focus on site-specific areas for this analysis.

Properly Functioning Condition

**1047. The Wasatch-Cache National Forest should manage grazing to restore Properly Functioning Condition for riparian areas and watersheds.**

**Response:** The purpose of our ground cover standards, utilization standards and newly created utilization guideline for rangelands in unsatisfactory condition is to maintain rangelands currently meeting or moving toward forest plan desired conditions. The purpose is also to move unsatisfactory condition rangelands (those not meeting or moving toward desired conditions) toward desired conditions, which are properly functioning conditions.

**1048. The Wasatch-Cache National Forest should report allotments that are not within Properly Functioning Condition in the Forest Plan with appropriate management actions to restore ecological function.**

**Response:** See Response 1047. Regardless of where they occur, rangelands that are not properly functioning will benefit from the direction provided in the revised Forest Plan.

**1049. The Wasatch-Cache National Forest should restore rangelands to Properly Functioning Condition of watersheds, riparian areas, and lands in unsatisfactory condition.**

**Response:** See response 1047.

Restoration

**1050. The Wasatch-Cache National Forest should identify and restore areas damaged by grazing.**

**Response:** Implementation of guidance outline in the Forest Plan (Desired Future Conditions, Goals, Objectives, Standards and Guidelines) will help restore rangelands in unsatisfactory condition.

**1051. The Wasatch-Cache National Forest should require the restoration of all native woody plants in the Forest Plan.**

**Response:** Standard 26 notes that no more than 50% of the current year's growth on woody vegetation is to be browsed during one growth cycle. This was based on research that determined this to be a proper level of use.

Monitoring and Enforcement

**1052. The Wasatch-Cache National Forest should monitor and enforce range quality standards and allotment management plans.**

**1052.1 To protect ecological values**

**1052.2 To ensure overgrazing does not occur**

**1052.3 To justify grazing at or near current levels**

**1052.4 To meet the requirements of the National Forest Management Act**

**1052.5 To protect wildlife and forest health**

**Response:** As noted in Response 1050 above, the implementation of guidance outline in the Forest Plan will help restore rangelands in unsatisfactory condition. Doing this will protect and improve ecological values; will ensure overgrazing does not occur; will adjust grazing levels to those appropriate for conditions and capability of allotments; and will protect wildlife habitat and the health of the rangelands. We have met the requirements of the National Forest Management Act through this revision process.

Infrastructure

**1053. The Wasatch-Cache National Forest should repair denuded allotments with fencing, enclosures, and prescribed fire.**

**Response:** Various tools are allowed to manage allotments, including fences, enclosures, and prescribed fire.

**1054. The Wasatch-Cache National Forest should develop a better-managed fencing system.**

**Response:** Fencing systems are more appropriately determined at the site-specific scale, which is outside the scope of this revision process.

**1055. The Wasatch-Cache National Forest should set grazing fees sufficient to cover fencing for sensitive riparian areas.**

**Response:** Grazing fees are set nationally and cannot be altered by the Forest.

**1056. The Wasatch-Cache National Forest should not fence areas such as Steel Creek Park because this park is a non-grass growing area and money would be better spent on other forms of forest maintenance.**

**Response:** Site-specific proposals are not addressed in the FEIS or Forest Plan.

**1057. The Wasatch-Cache National Forest should not allow livestock to use the recreational infrastructure.**

**1057.1 With penalties for violation**

**1057.2 To avoid user conflicts**

**1057.3 Allotments and Permits**

**1057.4 Allotments**

**Response:** Range suitability is addressed in FEIS, Chapter 3, Topic 7 – Rangeland Capability and Suitability and further described in FEIS Appendix B9. While livestock are not allowed in developed recreation areas, they are still allowed to graze within permitted allotment boundaries. Regardless of recreation uses, as long as rangelands continue to be in satisfactory conditions or are moving toward desired conditions, this is allowed to continue.

**1058. The Wasatch-Cache National Forest should reduce the number of grazing allotments available to protect resources.**

**Response:** The number of open allotments has been reduced by 10, with the potential for additional closures if permits are voluntarily waived without preference.

**1059. The Wasatch-Cache National Forest should not reduce the number of grazing allotments available.**

**Response:** Only vacant allotments are closed and only those that conflict with bighorn sheep health and habitat in the Uinta Mountains and municipal watersheds in Salt Lake and Davis Counties. Other allotments in the upper elevations of the Uinta Mountains would be closed only if permits were voluntarily waived without preference. All allotments and their status are identified in FEIS, Appendix I.

**1060. The Wasatch-Cache National Forest should close vacant grazing allotments in the High Uintas.**

**Response:** See response 1059.

**1061. The Wasatch-Cache National Forest should modify the Forest Plan to indicate vacant allotments will remain vacant until an environmental analysis can be completed.**

**Response:** See response 1059.

**1062. The Wasatch-Cache National Forest should allow voluntary/permanent allotment retirements.**

**Response:** See response 1059.

**1063. The Wasatch-Cache National Forest should measure the benefits of introducing non-native species, which threaten livestock grazing allotments against the economic impact of those introductions.**

**Response:** Bighorn sheep were historically present in the Uinta Mountains. Only vacant allotments are closed on the eastern portion of the Forest. Bighorn sheep would not be used as a reason to close an allotment. Other allotments in the upper elevations of the Uinta Mountains would only be closed if permits in bighorn sheep habitat were voluntarily waived without preference. As such, no direct economic

impacts would occur because of bighorn sheep. However, impacts to communities, either local or otherwise, may occur. It is difficult to predict whether or not any of these permits would be voluntarily waived during the planning period. And because a permit can be issued to anyone meeting the basic requirements, wherever they may live, impacts in any given community are unknown.

**1064. The Wasatch-Cache National Forest should review management allotment plans for the Bear Management Area and reduce livestock numbers.**

**Response:** This site-specific analysis is outside the scope of this revision process.

**1065. The Wasatch-Cache National Forest should close the Gilbert Creek, Henry's Fork, and Smith's Fork allotments.**

**Response:** The Gilbert Peak, Henry's Fork-Hessie Lake, and Red Castle allotments would be closed if permits are waived without preference. Gilbert Creek and West Fork Smiths Fork allotments do not pose threats to bighorn sheep health and are not proposed for closure.

**1066. The Wasatch-Cache National Forest should phase out over 10 years the Gilbert Creek, Henry's Fork, and Smith's Fork allotments.**

**1066.1 To protect the North Slope**

**1066.2 To protect big horn sheep**

**Response:** See response 1065.

Permits

**1067. The Final EIS should state the number of grazing permit holders on the forest to correct the misstatement that there are a "large number" of them.**

**Response:** There are approximately 150 permit holders on the Forest. This number has replace "large number" in the FEIS under the social-economic section. Of these, approximately 52 grazing permits are on the north slope of the Uinta Mountains accounting for about 39 percent of all cattle grazed on the Wasatch-Cache and about 40 percent of all sheep grazed.

**1068. The Wasatch-Cache National Forest should honor existing grazing leases but allow the leases to phase out.**

**Response:** While not applied Forest wide, most allotments in the upper elevations of the Uinta Mountains will be closed if permits are voluntarily waived without preference.

**1069. The Wasatch-Cache National Forest should allow permittees to voluntarily waive grazing permits to protect wildlife and watershed values.**

**Response:** Permits may be voluntarily waived without preference. Restocking all allotments other than those identified in the upper elevation of the Uinta Mountains, would be addressed on a site-specific basis because no overriding wildlife issues are present elsewhere on the Forest.

**1070. The Wasatch-Cache National Forest should include an accountability clause in grazing permits with conditions for reductions if permit terms are not met.**

**Response:** The Term Grazing Permit (FSM 2230) provides the equivalent of an accountability clause.

### Subsidies

**1071. The Forest Service should not subsidize grazing because it harms the environment and livestock produced on public lands does not contribute significantly to America's food supply.**

**Response:** As noted in response 1055, grazing fees are set nationally and cannot be altered by the Forest.

### Grazing

#### Allow Grazing

**1072. The Wasatch-Cache National Forest should allow grazing.**

**1072.1 With appropriate management to protect forest resources**

**1072.2 For the benefit of forest resources**

**Response:** The forest continues to allow grazing, while providing direction that protects rangeland resources and moves unsatisfactory rangelands toward desired future conditions.

**1073. The Wasatch-Cache National Forest should allow grazing in roadless areas.**

**Response:** An evaluation of each individual roadless area has been added to FEIS, Appendix C. Grazing has not been removed from any roadless area.

**1074. The Wasatch-Cache National Forest should allow grazing because it contributes to the economy.**

**1074.1 For rural counties in Utah**

**1074.2 For the ranching industry**

**Response:** Because only some vacant allotments are closed, the impacts to the existing economy will not be adversely affected.

**1075. The Wasatch-Cache National Forest should support grazing and allow managers to assess future conditions by selecting Alternatives 3 or 5.**

**Response:** Only broad desired future conditions are identified at the Forest wide scale, and these do not vary by alternative. These should be refined at the site-specific scale to identify those species that should occur and other characteristics that should be managed for.

#### Do Not Allow/Restrict Grazing

**1076. The Wasatch-Cache National Forest should phase out grazing.**

**1076.1 To return to properly functioning condition**

**1076.2 To allow vegetation to be restored**

**1076.3 To prevent economic, ecologic, and aesthetic impacts**

**1076.4 To protect bighorn sheep**

**Response:** See responses 1068 and 1069. Our newly defined utilization guideline (G70) will help improve the rate at which these rangelands move toward desired condition. Regarding bighorn sheep habitat, see response 1063.

**1077. The Wasatch-Cache National Forest should eliminate grazing wherever necessary to protect at-risk plant communities.**

**Response:** Grazing on the Wasatch-Cache National Forest has not been shown to negatively effect the rare plants that occur here. Most species that could be affected by grazing do not occur in grazing allotments.

**1078. The Wasatch-Cache National Forest should eliminate grazing in areas closed to motorized recreation.**

**Response:** Livestock and vehicles each have different effects on wildlife and their habitats. Possible livestock/wildlife conflicts are generally indirect. While livestock use of forage may occur on the same plant species that wildlife use, our stocking rates take wildlife needs into consideration. Motorized vehicle use can disrupt wildlife directly altering their distribution and ability to access their preferred habitat.

**1079. The Wasatch-Cache National Forest should restrict grazing.**

**1079.1 Until condition and trend are verified**

**1079.2 To protect water and aquatic resources**

**1079.3 To preserve recreational experiences**

**Response:** Our determination of range condition covers approximately 80 percent of rangeland acres within allotments on the Forest. Of these acres, approximately 7 percent have conditions that have been verified, 93 percent estimated. As noted in Response to concern statement 1022, the Forest has followed accepted protocols in the assessment of range conditions, using both verified and estimated techniques. Because of the vast numbers of acres of rangelands in allotments across the Forest (98 allotments covering over 300,000 suitable rangeland acres), it is not possible to verify conditions annually on all allotments. The riparian class evaluation has been applied to all river and stream segments evaluated for wild and scenic river status and is included in Forest Plan Appendix XII. The most restrictive grazing standards and guidelines apply to those segments that have either Bonneville or Colorado cutthroat trout. Grazing has been eliminated in the Salt Lake and portions of the Davis County watersheds. Water quality for all those watersheds used for public drinking water supply do not exceed State water quality standards as a result of livestock use. Conflicts between livestock and recreational uses on the Forest are recognized and livestock use has only been eliminated from developed recreation areas. Because of wide ranging values for different uses on the Forest it is difficult to maintain one experience at the expense of another.



**1080. The Wasatch-Cache National Forest should reduce grazing throughout the Forest.**

**1080.1 By 25 percent**

**1080.2 To reach biodiversity goals**

**1080.3 To prevent topsoil erosion, ground terracing, and vegetation destruction**

**1080.4 To restore streams for fishing**

**Response:** Grazing numbers throughout the Forest are better determined through site-specific analyses of conditions, trends, and the relationship of rangelands to the desired conditions of those lands. The utilization standards and guidelines are based on research that maintains the health and reproductive capability of rangeland plant species. In addition, they are designed to help rangelands move toward desired conditions for plant and animal communities, prevent soil erosion and to maintain or improve riparian areas, including habitat for fish.

**1081. The Wasatch-Cache National Forest should not allow grazing levels to exceed regenerative capacity.**

**Response:** See Response 1080.

**1082. The Wasatch-Cache National Forest should prohibit grazing.**

**1082.1 To preserve ecological values**

**1082.2 To reduce fire hazard**

**1082.3 To prevent the spread of noxious weeds**

**1082.4 To preserve scenic quality**

**Response:** Implementation of the grazing utilization standards and the guidelines added for rangelands in unsatisfactory condition, will help move these areas toward desired conditions. Grazing has been shown to reduce fire hazard in some rangelands, although those where cheatgrass dominates the understory remain high fire hazard areas because of the flashy nature of the associated fuels. On the Wasatch-Cache National Forest, it has been determined that most noxious weeds occur along highways, roads, and trails, indicating that noxious weed spread, while associated to some degree with livestock use, is more associated with human travel ways. There are areas of the forest where livestock grazing has affected the scenic quality. In general, these areas are also ecologically unsatisfactory and will be managed to move toward desired conditions. As these sites move toward desired ecological condition, visual qualities will improve as well.

**1083. The Wasatch-Cache National Forest should prohibit grazing because of its introduction of Tubifex, a host for the whirling disease parasite of trout**

**Response:** We recognize the importance of trying to reduce the spread of whirling disease on National Forest Lands. We also recognize the part the tubifex worm plays in the life cycle of this parasite that causes this disease. We realize that as habitat for the worm increases the potential for increasing the tubifex population increases. So far in Utah we have not seen major mortalities from whirling disease. We believe that as we implement the grazing standards and guidelines identified in the FEIS, the in-channel and riparian habitat will be maintained or improved thus

reducing the habitat for the tubifex worm and the threat of whirling disease outbreaks.

**1084. The Wasatch-Cache National Forest should prohibit grazing in certain areas.**

**1084.1 In the entire forest**

**1084.2 In roadless areas**

**1084.3 In wilderness areas**

**1084.4 Near Wild and Scenic Rivers**

**1084.5 In severely impacted riparian areas and stream banks**

**1084.6 In watersheds and riparian areas**

**1084.7 In areas with aspen and conifer stands**

**1084.8 In Logan Canyon**

**1084.9 In the North and Middle Forks of High Creek, Cottonwood and Blind Hollow, Spawn Creek, Bunchgrass Drainage, Steam Mill Canyon, and Steep Hollow, Smithfield Dry Canyon, Birch Canyon, and the T.W. Daniels Forest**

**1084.10 Along the Mirror Lake Highway and the upper wetlands of the Provo, Duchesne, Weber, and Bear Rivers**

**1084.11 In the western drainage of Mount Naomi Wilderness and south-facing drainage in Logan Canyon**

**1084.12 On the east slopes of Mount Naomi Wilderness**

**1084.13 In the Mid Bear River Range**

**1084.14 South of Hardware Ranch**

**Response:** Site-specific decisions to allow or not allow livestock grazing are outside the scope of this analysis.

**1085. The Wasatch-Cache National Forest should prevent overgrazing in watersheds by alternating grazing by location and year.**

**Response:** We encourage rotation systems, either rest rotation where entire pastures within allotments are rested each year, or deferred grazing where the order in which pastures within allotments are grazed is rotated from year to year. This, coupled with utilization standards and guidelines, will help move rangelands toward desired conditions.

**1086. The Wasatch-Cache National Forest should not allow motorized access for grazing purposes to protect wilderness areas.**

**Response:** The 1984 Utah Wilderness Act 1984 states, "Grazing of livestock in wilderness areas established by this Act, where established prior to the date of the enactment of this Act, shall be administered with section 4(d)(4) of the Wilderness Act and section 108 of Public Law 96-560." Forest Service Manual 2320 direction, under Exhibit 1, Congressional Grazing Guidelines, is consistent with this Act. The Manual states, "Where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment." It goes on to describe the conditions and gives examples of appropriate uses of motorized vehicles in wilderness.

## Topic 8: Special Designations

### Special Designations General

**1087. The Wasatch-Cache National Forest should designate more lands for protection. If the final decision allows more landscape impacts than the Preferred Alternative.**

**Response:** The revised forest plan provides direction for assessing the possible addition of two Research Natural Areas; one near Ben Lomond Peak for its Tall Forb plant communities and one on the western portion of the Deseret Peak Wilderness for its Great Basin plant communities and the potential to study cryptogamic soil crusts. In addition, within the Tri-Canyons area east of Salt Lake County there is the potential for the identification and establishment of one Special Interest Area.

**1088. The Wasatch-Cache National Forest should continue to make special designations for Research Natural Areas and Wild and Scenic Rivers. With no consideration for political positions.**

**Response:** The Forest can only recommend rivers for Wild and Scenic River designation. As with wilderness, Congress has the authority for designating Wild and Scenic Rivers. We have proposed additions to the existing Morris Creek Research Natural Area (RNA) and have proposed additional areas be investigated in the future for RNA status (see response to concern statement 1087). It is the value of these areas that are the primary consideration in their recommendations and establishment.

### Research Natural Areas

**1089. The Wasatch-Cache National Forest should identify in the Forest Plan potential areas that could contribute to diversity in the Research Natural Area system.**

**Response:** See Response 1087.

**1090. The Wasatch-Cache National Forest should selectively expand Research Natural Areas. The Mollen's Hollow Research Natural Area is one of these.**

**Response:** The Mollen's Hollow RNA boundary includes the best of the conditions that occur in that area as well as the most manageable boundary. As noted in the response to concern statement 1089 above, the Morris Creek RNA is proposed for expansion and is explained in more detail in the FEIS Chapter 3, Topic 8 – Special Designations.

**1091. The Wasatch-Cache National Forest should designate additional Research Natural Areas.**

**1091.1 To gain a better understanding of forest function**

**1091.2 Temple Fork and Spawn Creek watersheds and Right Hand Fork of the Logan River watershed.**

**1091.3 Willow Creek Canyon east of Cowley Canyon and the small canyon by the SNC**

**Response:** Portions of Right Hand Fork and Logan Canyons have been identified as Special Interest Areas, rather than Research Natural Areas (RNAs), because some of the recreation and livestock grazing uses in these areas are incompatible with characteristics typically associated with RNAs. These areas do, however, provide many of the same research opportunities because of the near-pristine conditions and the high number of rare plant species in the area. Most of the areas mentioned do not meet the basic objectives for RNA establishment outlined in the Forest Service Manual 4060:

4063.02 - Objectives. The objectives of establishing research natural areas are to:

1. Preserve a wide spectrum of pristine representative areas that typify important forest, shrubland, grassland, alpine, aquatic, geological, and similar natural situations that have special or unique characteristics of scientific interest and importance that, in combination, form a national network of ecological areas for research, education, and maintenance of biological diversity.
2. Preserve and maintain genetic diversity.
3. Protect against serious environmental disruptions.
4. Serve as reference areas for the study of succession.
5. Provide onsite and extension educational activities.
6. Serve as baseline areas for measuring long-term ecological changes.
7. Serve as control areas for comparing results from manipulative research.
8. Monitor effects of resource management techniques and practices.

**1092. The Wasatch-Cache National Forest should use the Red Butte Research Natural Area to study Properly Functioning Condition and Range of Natural Variability.**

**Response:** The upper portion of the existing Red Butte RNA has been and continues to be a focus of much research because of its relatively undisturbed nature. The lower portion, because of its relatively high amount of introduced species is proposed as a Special Interest Area and will emphasize restoration ecology research and environmental education.

**1093. The Wasatch-Cache National Forest should not open the Red Butte Canyon Research Natural Area to tourism.**

**Response:** While we propose to change the designation in the lower portion of Red Butte Canyon to that of a Special Interest Area (SIA), research will remain the highest purpose for this area. Because conditions in this portion of the RNA are less than natural, it was felt that this area could more appropriately be used for restoration ecology research. We also feel that existing trails in the area should be maintained and that environmental education should be an additional focus of this SIA.

### Special Interest Areas

**1094. The Wasatch-Cache National Forest should designate a Special Interest Area in Logan Canyon to protect endemic cliff plants.**

**Response:** An SIA is proposed in this area for this purpose as well as to focus on environmental education and protection of reference ecosystems.

**1095. The Wasatch-Cache National Forest should designate the lower part of the Red Butte Research Natural Area as a Special Interest Area to allow for restoration and education below the dam.**

**Response:** See response 1093.

### Special Areas

**1096. The Wasatch-Cache National Forest should manage lands as Special Areas to prevent impacts that will be harder to reverse.**

**Response:** Special Areas, Special Interest Areas, and Research Natural Areas are identified in areas where historic management and impacts from various activities have not had significant impacts. These designations are applied to maintain these relatively low disturbance conditions.

**1097. The Wasatch-Cache National Forest should consider forming additional Special Areas for botanical, geological, or archeological interests.**

**Response:** While we have not identified additional Special Areas, we have identified new potential Special Interest Areas, which are noted in Chapter 3, Topic 8 – Special Designations, of the FEIS. These areas were primarily focusing on biological/botanical purposes. Other geologic or archaeological areas, while not identified at this time, can be added through future amendments.

### Wild and Scenic Rivers

**1098. The Wasatch-Cache National Forest should involve the public in making wild, scenic, and recreational designations.**

**Response:** In the future we need to do a suitability study on the rivers that were found to be eligible in 1999 for the National Wild and Scenic Rivers System (NWSRS). At that time the public will be given opportunities for input into the study process. However, the Wasatch-Cache does not designate these rivers in the NWSRS, that is the responsibility of Congress, which, of course, can be influenced by public sentiments and opinions.

**1099. The Wasatch-Cache National Forest should provide interim protection for eligible Wild and Scenic Rivers, by ensuring proposed activities are compatible with protection and designation.**

**Response:** Protection for rivers that are eligible as Wild and Scenic Rivers is provided in Appendix VIII in the revised Forest Plan, which includes a list of the eligible rivers. Appendix VIII has guidelines for protection of eligible wild, scenic,

or recreational rivers from activities, which might be proposed that, could alter their free-flowing character or outstanding values. Protection is afforded until a suitability study is completed. If found suitable, eligible rivers would continue to be protected. If not found suitable, a river would no longer be eligible, and protection could not be provided under the Wild and Scenic Rivers Act. Identified river values and free flowing character could be protected under other authorities.

**1100. The Wasatch-Cache National Forest should consider that the description of the Standards for Recreational rivers structures is too broad and allows too many new developments and communities.**

**Response:** The standards used for Wild, Scenic, and Recreational rivers are national standards taken from the Forest Service Handbook, 1909.12 Land and Resource Management Planning, Chapter 8, Wild and Scenic River Evaluation. As such the standards were developed at the national level. We chose to apply these national standards, as they are adequate to protect the existing conditions on the eligible streams to which they are applied.

**1101. The Wasatch-Cache National Forest should designate additional Wild and Scenic Rivers.**

**1101.1 To protect aquatic habitats and their diversity.**

**1101.2 Multiple rivers (38 rivers were listed in the comment.)**

**1101.3 Logan River**

**Response:** The Forest Service does not “designate” Wild and Scenic Rivers. Congress usually does this.

We protected aquatic habitats eligible for the NWSRS when they met the criteria established by the federal land management agencies in the State of Utah.

A comment suggested that many additional rivers on the Wasatch-Cache should be examined for eligibility or were eligible for the NWSRS. In order to be included in the inventory, river segments had to meet certain criteria identified in the inventory process. The interdisciplinary team evaluated for eligibility those segments meeting the criteria for inclusion in the many river segments and some additional segments identified by Forest Service personnel and the public during the inventory process, and found eligible only those that met the statewide criteria.

Much of the Logan River is receiving interim protection of its free flowing character and identified values as a recreational river. The standards in Appendix VIII of the revised Forest Plan itemize what that protection entails. The Logan River must go through a suitability analysis to see if maintaining its values and free-flowing condition are the most appropriate use of the river. Designation as a Wild and Scenic River could come after an act of Congress, and is outside the authority of the Forest Service.

**1102. The Wasatch-Cache National Forest should not designate additional Wild and Scenic Rivers like Little Bear Creek.**

**Response:** The Forest Service does not designate Wild and Scenic Rivers, but as part of the inventory process, can find rivers eligible and afford them interim protection until suitability is determined or Congress acts to designate the river. The Wasatch-Cache has field checked Little Bear Creek, and agrees with a comment which provided information contending that 1) the stream should neither have been classified as “wild” because of the presence of a motorized trail nor 2) were Bonneville cutthroat trout metapopulations present in the stream more than a mile above its confluence with the Logan River. For these reasons Little Bear Creek’s classification has changed to Scenic, and the length of the eligible segment length has changed from 4.5 miles to about 1 mile.

**1103. The Wasatch-Cache National Forest should ensure that operational patterns for Trial, Lost, and Washington Lakes are consistent with a “Recreational” designation.**

**Response:** The concern suggests that a Recreational classification of a river below a dam may not be appropriate, as water flow regulation by a dam above the river segment (in this case the Upper Provo River) could affect the stream’s eligibility. The commenter had good insight in suggesting that flow regulation below a dam might affect eligibility, but the characteristic of the river in relation to the question is not its classification (i.e. Recreational, Scenic, or Wild), but whether its free-flowing character, and hence its eligibility, below the dam is precluded by the dam’s potential to modify free-flow.

Congress and the Secretary of the Interior have designated many river segments that are above or below dams. Section 16 of the Wild and Scenic Rivers Act defines a “river” as “a body of water . . . or portion, section, or tributary thereof. . . “. “Free-flowing” is defined as “existing or flowing in natural condition without impoundment. . . “. Therefore, any section of river with flowing water meets the technical definition of free-flowing, even if impounded upstream.

## **Topic 9: Oil and Gas Leasing**

### **Oil and Gas Leasing General**

**1104. The Wasatch-Cache National Forest should indicate where oil and gas exploration and development are to be allowed.**

**Response:** Management prescription 8 was mapped only for existing oil and gas areas of development (fields not single wells), not for areas of future exploration. Chapter 1 of the EIS discusses the fact that only the area of high potential for which there is no leasing decision is being addressed in the Forest plan revision. In Chapter 3, Topic 9 in the EIS further defined the leasing analysis completed and the area to be analyzed at this time. Leasing opportunities for each alternative are best represented in the set of 11 X 19 inch maps that was included in the map package. These maps showed the leasing stipulations to be applied. Management direction

for future leasing exploration and development has been clarified in the Final Revised Plan. One part of the plan's management direction are maps associated with the Western and Eastern Management Areas that show where future leasing is allowed and under what conditions.

**1105. The Forest Service should develop detailed standards for managing minerals, oil, and gas exploration/extraction to protect wildlife, water quality, and other surface resources.**

**Response:** Oil and gas exploration and development is a staged decision making process. Determining availability and lease stipulations is the first step. The next step is when a specific application to drill is submitted for a specific location on the ground. It is at this step that specific conditions of approval and resource protection mitigation and monitoring requirements are applied.

**1106. The Wasatch-Cache National Forest should immediately begin to inspect oil and gas development sites to determine potential effects on surface and ground water.**

**Response:** Annual inspection by Forest and Bureau of Land Management personnel is required. In addition the minerals administrator on the Mountain View Ranger District inspects sites frequently to assure compliance with requirements and regulations.

**1107. The Wasatch-Cache National Forest should ensure that oil and gas exploration sites are restored by making restoration a condition of the lease.**

**Response:** As explained in Chapter 3, Topic 9 and in Appendix G in the FEIS, oil and gas development is a staged decision process. As such, restoration of the site is addressed at the Application for Permit to Drill stage in the Surface Use Plan. Bonds are a requirement of development and are not released until oil companies have complied with all the requirements of reclamation. Not all sites are required to be restored to pre-development condition. Sometimes the decision is made to leave the roads in place for recreation access and use the well pads as trailheads sites.

**Adequacy of Analysis**

**1108. The Wasatch-Cache National Forest should address oil and gas potential.**

**1108. By providing analyses and maps showing oil/gas potential**

**1108. By providing maps and text references on the Appeal Settlement Zone**

**1108. By using more recent data on oil and gas resource potential**

**Response:** We have expanded the discussion on oil and gas potential to include more recent information including the 1995 USGS National Assessment of Oil and Gas Resources. References to maps and information in this assessment can be retrieved from the USGS website and is referenced in the FEIS.



**1109. The Draft EIS should provide further rationale for identification of a field in the area of North Flank Fault.**

**Response:** Directional drilling has been completed by Union Pacific on their land in Summit County and has proven successful for them. There are many factors contributing to whether or not directional drilling can be used successfully on national forest terrain within the appeal settlement zone. However, because each situation is unique and must be evaluated and judged on its own merits, we think it's reasonable to assume that no surface occupancy makes oil exploration and development more difficult for industry.

After an exploratory well is drilled and successful, confirmation wells are needed to confirm the discovery and identify a field. Development of a field would then be proposed and analyzed. Each stage requires new analysis with public involvement. Each analysis would address consistency with the revised forest plan management direction including stipulations.

The scope of the decision to be addressed in the revised forest plan was the area of high potential for which there is no leasing decision, referred to as the Appeal Settlement Zone. As explained in the cumulative effects section in the EIS, additional development in the Uinta Mountains outside the Appeal Settlement Zone is predicted and documented in the 1994 North Slope Oil and Gas Leasing Final Environmental Impact Statement.

**1110. The Wasatch-Cache National Forest should analyze the impacts of allocating land to oil and gas development to comply with the National Environmental Policy Act.**

**Response:** We agree that by determining the availability of an area to leasing is an allocation decision and that there is potential to change an area from its current condition. However, while that does not mean every acre of every lease is going to be developed, there is still the potential. Because of the many variables involved with the petroleum industry's decision to move forward, we have to portray effects based on some prediction of what seems to be a reasonably foreseeable development picture. That is why the leasing decision was a critical aspect of each alternative. The range of alternatives analyzes different levels of development.

**1111. The Wasatch-Cache National Forest should reexamine the financial risk of additional leasing in the Draft EIS to determine if the oil and gas industry will be at risk if leasing is not allowed.**

**Response:** You are correct. The statement in the EIS reflected the situation with the current block of leases known at the Table Top unit. No, the entire oil and gas industry is not at risk if leasing is allowed. We have edited Topic 9 to be clearer on this point.

## **Allow Leasing**

### **1112. The Wasatch-Cache National Forest should allow oil and gas leasing in the Table Top Unit.**

**Response:** Leasing is allowed in Alternatives 2, 3, 5, 6, and 7. In all alternatives existing leases are honored and their development is recognized in the effects disclosure. The range of alternatives addressed leasing scenarios that were very restrictive to the petroleum industry to those that allowed great opportunity for development. Alternative 7 tries to strike a balance in protecting some areas for future wilderness designation while allowing oil and gas development. Our reasoning to not issue leases after current ones expire is to not encumber future wilderness with outstanding rights.

## **Do Not Allow/Restrict Leasing**

### **1113. The Wasatch-Cache National Forest should allow no oil and gas leasing in roadless areas.**

**1113.1 To protect unique and vital habitat**

**1113.2 To preserve roadless characteristics and values**

**1113.3 In the Uintas**

**1113.4 In the Appeal Settlement Zone**

**1113.5 On the North Flank Fault**

**1113.6 On the North Slope**

**Response:** Alternative 1 which does not allow leasing within the Appeal Settlement Zone is most responsive to your concern. In Alternative 1 the ecosystem remains intact and unique habitat and roadless values are preserved. All the alternatives incorporate the 1994 Leasing decision for the North Slope of the Uinta Mountains, which does allow leasing on about 148,000 acres.

## **Topic 10: Fire Management**

### **Fire Management General**

### **1114. The Wasatch-Cache National Forest should include the importance of fire in its new fire management plans**

**Response:** Thank you for your comment.

### **1115. The Wasatch-Cache National Forest should evaluate the feasibility of fire management in non-motorized, roadless, and wilderness areas**

**1115.1 To protect habitat**

**Response:** We recognize that there may be increased costs to suppress fires in roadless or wilderness areas. We believe these costs will be far off set as some fires are allowed to burn in these backcountry areas with minimal staffing. It is important to realize that wildland fires that are allowed to burn are still managed within identified prescriptions or conditions to prevent major impacts to fish, birds, animal, soil and watershed resources.

See also the Fire Management direction in the Forest Service Manual and the Desired Future Condition, Forest-wide goals, subgoals, standards and guidelines of the Forest Plan. Fire management direction is also found in the Wasatch-Cache and Uinta Forests' Fire Management Plan.

**1115.2 To manage small roadless areas**

**Response:** Prescribed and wildland fires can be smaller than 5,000 acres in size and prescriptions can be set up for these smaller areas. If fire burn outside of their prescription the fire is reclassified as a wild fire and is suppressed. In areas where wild fires are not allowed and no thinning or timber harvest can take place there are a number of other treatments that can be used to change vegetation into an earlier successional stage and may include some type of mechanical treatment. We also recognize the fact that not all areas can or should be treated at once. In some cases areas may never be treated. Vegetation succession then continues on to a later stage of succession until a natural event alters this condition be it fire or a bug infestation for example. The vegetation is then changed to an earlier stage of succession.

**1115.3 To meet desired landscape goals**

**Response:** Thank you for your comment. See response to 1115.1

**1115.4 To protect watersheds**

**Response:** We recognize the need to be careful the municipal watersheds on the forest. Mechanical treatments can include the use of animals, equipment and/or people with hand tools. See also response to 1115.1

**1116. The Wasatch-Cache National Forest should develop a new fire plan for remote roadless and wilderness areas.**

**Response:** Thank you for your comment. We are trying to make significant changes in this area with wildland fire use plans. You will notice in the FEIS that most prescriptions allow for wildland fire use. Additional direction for this area is in the Wasatch-Cache and Uinta National Forests' Fire Management Plan.

**1117. The Wasatch-Cache National Forest should coordinate vegetation information with prescribed fire objectives to evaluate how threatened and endangered plant species respond to fire.**

**Response:** See the Fire Management direction in the Implementation direction of the Forest Plan. A person trained in botany or plant ecology is part of the expertise required for biological evaluations.

**1118. The Wasatch-Cache National Forest should replace the word "historic" with "natural" in the desired condition for fire management because of historic fire suppression efforts.**

**Response:** Thank you for your comment. Historical refers to the last 500 years. This has been added to the sentence.

**1119. The Wasatch-Cache National Forest should be forthright in stating its objectives in priority treatments.**

**Response:** Thank you for your comment. The intent is to restore aspen communities. Timber harvest may be one tool to accomplish this in an economical manner.

**Adequacy of Analysis**

**1120. The Wasatch-Cache National Forest should explain what it means to “take timely actions to restore proper functioning of ecosystem after wildfire.”**

**Response:** This refers to the process of assigning an interdisciplinary team (soil scientist, hydrologist, ecologist) to evaluate the situation immediately and make recommendations on actions such as erosion control and seeding to prevent loss of soil productivity, sedimentation of streams, and invasions of noxious weeds.

**1121. The Wasatch-Cache National Forest should correct contradictory statements regarding fire suppression and insect activity levels**

**Response:** The first statement refers to the potential for extensive insect caused mortality, while the second statement refers to the current state of mountain pine beetle activity. The existing forests are comprised primarily of older age classes of trees growing at high densities, conditions that predispose them to widespread insect caused mortality. Currently mountain pine beetle activity is at endemic levels, with pockets of insect mortality occurring in several locations, but not covering extensive areas of the landscape. However, the stand conditions that facilitate the spread of the insects and favor increasing insect populations still exist. If insect populations were to increase rapidly in response to environmental factors such as drought, the existing stand conditions increase the potential for the outbreak to reach epidemic levels, similar to what occurred on the North Slope in the early 1980s.

**Legal Considerations**

**1122. The Wasatch-Cache National Forest should support exceptions to the Clean Air Act to restore forests to healthy conditions**

**Response:** Thank you for your comment. We recognize that this will be a challenge and some exceptions are made, within the Act, to carry out these types of activities.

**Education**

**1123. The Wasatch-Cache National Forest should educate the public and property owners about what they can do to protect their property from fire in order to accomplish fuel reduction.**

**Response:** Thank you for your comment. This is currently being started.

## Fuels Management

### Fuel Treatments

- 1124. The Wasatch-Cache National Forest should create a long-term strategy for prescribed fires, wildland fire use, and mechanical treatments to alleviate threatened and endangered species concerns.**

**Response:** See the objectives for vegetation management and urban interface fuels management. This would be part of the plan to be developed.

- 1125. The Wasatch-Cache National Forest should carefully plan the prescribed sagebrush treatments to benefit sage grouse.**

**Response:** This will be taken into consideration when treatments are done in sagebrush. We have a copy of the document and will be incorporation the appropriate information in site-specific NEPA documents for the treatments.

- 1126. The Wasatch-Cache National Forest should more fully utilize timber harvest and grazing in conjunction with prescribed burns**

**1126.1 To avoid wasting resources**

**Response:** Thanks for your comment.

**1126.2 To maintain a healthy forest**

**Response:** We recognize that wild fires need to be suppressed. This is addressed in the Wasatch-Cache and Uinta National Forests' Fire Management Plan. We also recognize the role fire plays in the ecosystems and that we will be unable to either harvest or graze sufficient areas of land large enough to maintain healthy ecosystems through the use of these two tools alone.

**1126.3 To avert fire risk**

**Response:** Thanks for your comment. See response to response 1126.2. See also the Forest Wild Activities and Project Outputs for timber and range livestock outputs. We also believe that prescribe fire is a valuable tool to be used in restoring healthy ecosystems.

**1126.4 To bring the forest back into historic range of variability**

**Response:** Thank you for your comment. We recognize the need for public information and maintaining prescribed fires, especially in urban interface zones, within prescription. See the objective for urban interface fuels management in the Plan.

**1126.5 To maintain the viability of local economies**

**Response:** We recognize the opportunity that exists to provide forest products and the benefits that comes to local communities. However, our primary responsibility is to provide for the sustainability of the land. A greater discussion can be found in the plan under ecosystem management framework and the forest plan model and the Forest Service Natural Resource Agenda for the 21<sup>st</sup> Century. It's important to

recognize that not all National Forest lands on the Wasatch-Cache National Forest are available for timber harvest. Based on information presented in Table 3, under land classification, of the Forest Plan, only 2.5% is identified as totally suitable forest lands for timber harvest. This is not to say that timber harvest cannot occur in other prescriptions than those identified as Management Prescriptions 5.2/6.2. It is recognized that timber harvest may occur on lands not mapped with prescription categories 5-2/6-2. The objectives in these other prescriptions are not timber production See FEIS Table TM-2. This increased the acres available for timber harvest is 202,000 acres or 16% of the forest. Harvest from this area is identified and accounted for in the plan. Also see the discussion for response to Issue 4 in the Forest Plan.

**1127. The Wasatch-Cache National Forest should utilize prescribed burns or selected removal of fuels instead of full harvesting to better mimic natural processes.**

**Response:** Thank you for your comment. See Revision Topic 7 suitable timberlands.

**1128. The Wasatch-Cache National Forest should reevaluate timber harvesting and mechanical treatments as means to meet forest goals**

**1128.1 Because of their inability to restore fire-adapted ecosystems**

**Response:** The Revised Forest Plan developed from the selected FEIS Alternative 7 provides for a combination of approaches to restore fire-adapted ecosystems. These include timber harvest, mechanical treatments, prescribed fire and wildland fire use. The treatment applied to a particular stand will depend upon a site-specific analysis that incorporates management objectives, potential outputs and consideration of other resources. The majority of acres to be treated are with prescribed fire except in the wildland urban interface where human safety and needs for protecting structures such as homes require a mechanical treatment approach.

**1128.2 Because of the role of standing dead timber in forest wild fires**

**Response:** The Revised Forest Plan provides direction in the form of standards and guidelines to ensure that the functions of standing dead timber continue to be provided for after any kind of timber harvest or mechanical treatment.

**1128.3 Because mature trees are needed for wildlife habitat**

**Response:** The Revised Forest Plan provides direction in the form of standards and guidelines to ensure that the functions of mature trees for wildlife continue to be provided for after any kind of timber harvest or mechanical treatment.

**1128.4 Because young trees have high fuel load values**

**Response:** See response 1128.1.

**1128.5 Because timber harvesting cannot replace the role of fire in the forest**

**Response:** See response 1128.1.

**1128.6 Because harvested areas show a strong association with increased rate of spread and flame length**

**Response:** See response 1128.1.

#### Prescribed Burns

**1129. The Wasatch-Cache National Forest should not rely on prescribed burns for fire management**

**1129.1 Because they do not prevent high-severity fires**

**Response:** Thanks for your comment.

**1129.2 Because they are not adequate to meet forest goals**

**Response:** After reevaluating these projects the number of acres identified over a 10 year period have been dropped to 37,000 or 3,700 per year. See table 2-2 in the FEIS. prescribed fire

**1130. The Wasatch-Cache National Forest should utilize prescribed burns to maintain bio-integrity**

**Response:** Thank you for your comment.

#### Fire Suppression

**1131. The Wasatch-Cache National Forest should view burned areas as a natural process and allow fires to burn within Historic Range of Variability.**

**Response:** Fire and its affects are recognized as a natural process although the casual visitor may not see it as an esthetic or scenic character on the landscape. Wildland fire use is managed within prescriptions as identified by a fire management plan. These site specific plans identify when and where such use is appropriate. To define it in the Plan is premature. See the discussion in the analysis in the FEIS on the effects on scenic resources from fire, insects and disease.

**1132. The Wasatch-Cache National Forest should not make fire suppression the default course of action for areas not having a fire management plan.**

**Response:** Wildland fire use requires pre-stated resource management objectives over predefined geographic areas. To allow a fire to burn without such objectives and a defined area would be inappropriate and not keeping with national direction.

#### Heritage Resources

**1133. The Wasatch-Cache National Forest should modify current land management practices to protect western culture and heritage.**

**Response:** The Revised Forest Plan includes goals and standards and guidelines that address protection of heritage resources.

## Locatable and Salable Minerals

### Locatable and Salable Minerals General

**1134. The Wasatch-Cache National Forest should include discussions on recreational fossil collecting in the Forest Plan.**

**Response:** Recreational fossil collecting is briefly discussed in the Paleontology portion of the Locatable and Salable Minerals section of the EIS. While there are occurrences of some kinds of fossils in some areas that may attract recreational collecting interest, compared with other recreational activities, this use is rather limited and it has not by itself specifically been identified as a revision topic. Recreational fossil collecting is one of many recreational pursuits which are addressed through the management direction for recreation and access. As noted in the EIS, casual collecting of invertebrate fossils does not require any special authorization.

**1135. The Wasatch-Cache National Forest should add objectives for mineral and energy exploration and development to create better geologic maps, make inventories of the paleontological or mineral and energy resources, and regularly reassess the existing information on these geologic resources.**

**Response:** Our objectives focus our efforts on areas where the need to correct resource conditions or meet user demands are greatest.

The TERRA component of the NRIS database (the Forest Service's National Resource Information System) is gathering basic geologic data and will eventually be integrated into GIS layers amenable to display with other GIS layers. That will be updated, as geologic data are available.

The Wasatch-Cache experiences limited demand from mining claimants and few locatable mineral proposals. Commercial sources of salable material are available off-forest and sources on the forest are not in demand. Because of these factors we do not see a need for inventories of mineral resources. Where the petroleum industry has expressed interest in leasable minerals (primarily oil and gas), we have addressed that in Topic 9.

**1136. The Wasatch-Cache National Forest should add a discussion of the management direction for geologic, paleontologic, and mineral resources to the Forest Plan including a discussion of where energy and mineral development activities are, and are not, allowed under the proposed plan.**

**Response:** We have included management direction for these resources where we view a there is a need. In many cases current policy and existing law provides adequate direction. In the case of locatable minerals, management will be consistent with the 1872 Mining law, as amended which governs the disposal of those minerals. We also believe no additional direction is required because of the existing law and regulation for salable minerals under the Materials Act of 1947, as



amended. Management direction for paleontologic resources is found in Forest Service Manual 2680.3, which we believe is appropriate level needed.

In the absence of broad public interest or interest from the scientific community, we have generally chosen not to provide management direction regarding management of geologic resources. We have added specific direction for cave management in the forestwide standards and guidelines. In the future if a significant need is expressed relative to a particular resource, we will address that through Forest Plan amendments.

We have included management direction for oil and gas resources. For the areas of high potential for petroleum reserves on the Forest, we have added direction about leasing compatibility.

**1137. The Wasatch-Cache National Forest should combine the discussions on geological, mineral, and paleontological resources into a single topic in the Final EIS.**

**Response:** While there is no right or wrong way to organize subject areas, we chose to organize our EIS by Planning Topic.

**1138. The Wasatch-Cache National Forest should include maps depicting all currently active quarries/sand and gravel pits in the Final EIS.**

**Response:** All of the quarries sand and gravel pits on the Forest are used for internal Forest Service purposes only. There are no commercial operations. As such, we do not believe a map such as you one you request is necessary. Since commercial sources of salable material are available off-forest, there has not been a demand expressed by private operators. Should this situation change significantly, we'll address the need at that time.

### **Adequacy of Analysis**

**1139. The Final EIS should include a discussion of the effects of oil pits on wildlife mortality.**

**Response:** See Response 362.

**1140. The Wasatch-Cache National Forest should clarify whether acreage figures cited in the effects of oil and gas leasing on wildlife section are due to direct or indirect effects.**

**Response:** They are direct effects. This has been clarified in the text.

### **Mineral Extraction**

**1141. The Wasatch-Cache National Forest should restore areas with mining damage.**

**141.1 To protect watershed health**

**141.2 To restore the scenic value of Little Cottonwood Canyon**

**Response:** Since the mid-1980's, the Forest has been an active partner with the Utah Division of Oil Gas and Mining in inventorying and closing mine openings deemed to present an immediate hazard to the public. An ancillary effect of that is to restore a measure of scenic value in the canyons. It is important to note restoration of mines located on private lands is outside of Forest Service authority.

We agree that there are some harmful remaining effects to water quality from the mining in the 1800's. Since 1998, the Forest has been a participant in the Little Cottonwood Group. This group is assessing the effect of mining on Little Cottonwood Creek by collecting field data on water quality, stream morphology and aquatic health. An assessment is being reviewed by the Environmental Protection Agency.

**1142. The Wasatch-Cache National Forest should continue to allow recreational mining because it is not harmful.**

**Response:** As explained in the EIS, there are three stream segments open to recreational dredging, sluicing and panning under a cooperative USFS/BLNM/State permit. This use will continue in the revised forest plan. Other mining related activity is allowed on lands open to operations under the 1872 Mining Law, whether it be 'recreational' or not. We will manage those activities under Forest Service mining regulations when disturbance is significant.

## **Social and Economic Analysis**

### **Social and Economic Analysis General**

**1143. The Wasatch-Cache National Forest should prepare an adequate socioeconomic analysis.**

**1143.1 By including costs associated with different management activities in the social economic assessment.**

**Response:** The economic analysis of alternatives was completed according to federal regulations and Forest Service requirements. The FEIS includes economic analyses from both a regional and a national accounting stance. The regional accounting stance is used for social and economic impact analysis to local communities and counties. This includes changes to employment and labor income. The national accounting stance is used for the consideration of benefits and costs to all of society. The economic PNV analysis includes market prices for timber, range, and mineral outputs and non-market price estimates for outdoor recreation. This analysis is explained in the social and economic analysis in chapter 4 of the FEIS and in further detail in Appendix B.

Aside from the economic analysis, regional and national issues, values, and concerns were considered throughout the planning process. Comments from all interested people were used to develop alternatives and issues. Economic modeling considers impacts to local communities, but use of forest resources includes use from locals and visitors.

**1143.2 By including an analysis of the receipts and expenditures of the Fee Demo program in the social economic assessment.**

**Response:** The Fee Demo program, while enjoying some success both locally and nationally is not a decision that is made in the forest plan, and consequently not a required or appropriate disclosure in forest planning. Periodic reports on Fee Demo receipts are developed internally, and these and programs are available from the Wasatch-Cache if requested.

**1143.3 By analyzing the social and economic impacts on all forest users, not just local communities.**

**Response:** See response 1143.1.

**1143.4 By including the results of the Utah State University study “An Economic and Social Assessment of Snowmobiling in Utah”**

**Response:** Thank you for your comment, while the draft report had been used in the DEIS analysis, and the final report has been used in FEIS economic analysis.

## **Social Values**

### **Population Growth**

**1144. The Wasatch-Cache National Forest should factor projected population growth into management plans.**

**1144.1 By identifying the combined impacts of all users instead of viewing them separately.**

**1144.2 By acknowledging that population growth will result in restrictions on traditional experiences.**

**Responses:** The Forest Service alone cannot control growth. The Forest Service, state and local governments, non-profits organizations, businesses, and individuals all share the burden of planning for the future together. Even then, market forces, international events, and demographic pressures in and outside of the analysis area are beyond the control of any and all parties.

Growth of the Wasatch Front was identified and considered within the social and economic section of the FEIS, recreational growth and trends in use on the forest are presented in the recreation section of the FEIS. Cumulative effects of alternatives are presented in all resource sections and consider larger use trends surrounding the Forest.

### **Development**

**1145. The Wasatch-Cache National Forest should not have a goal to “encourage private enterprise to develop recreational facilities on and off the forest”, because this land belongs to the public.**

**Response:** Given increasingly higher demands for outdoor recreation, and the associated high cost of responding to these demands, federal funding alone is not

sufficient to sustain resource values while continuing to meet a good part of that demand in a responsible manner. Reducing costs to the American taxpayer and stimulating responsible local governments and the private sector has been, and will continue to be a national strategy for dealing with the issues of high recreation user demand, high costs, and concern for the continuity of forest settings.

**1146. The Wasatch-Cache National Forest should allow extensive commercial development on the Park City side of the range, and little or no additional commercial development of the Wasatch Front and its canyons.**

**Response:** In Alternative 3 some additional area for expansion of ski areas is provided on the east slopes of the Salt Lake District. This alternative also allows for some expansion of ski areas in canyons on the Wasatch Front side. Other alternatives do not allow for additional ski area expansions.

**1147. The Wasatch-Cache National Forest should prohibit development for environmental reasons.**

**1147.1 To protect wildlife habitat and winter range**

**1147.2 To protect watersheds**

**Responses:** In all alternatives wildlife habitat, winter range, and watershed protection are protected to varying degrees. The acreage available for development is minor in any alternative compared to what is protected, and certainly proposals for development would only apply to a very small percentage of lands. Any project planning would consider a range of mitigation treatments in alternatives where proposals for development are possible.

**1148. The Wasatch-Cache National Forest should prohibit development for social reasons.**

**1148.1 To preserve wilderness characteristics that provide an escape from an urban environment**

**1148.2 To preserve natural environments for the future**

**1148.3 To avoid bringing more users into the forests**

**1148.4 Until a carrying capacity study has been conducted**

**Responses:** A broad range of on-forest social settings are arrayed across the forest through the alternatives presented in the FEIS. Wasatch-Cache forest leadership recognizes the concerns of many in our population who feel that additional recreation use and impacts cannot be sustained.

**1149. The Wasatch-Cache National Forest should prohibit development in certain areas.**

**1149.1 In roadless areas**

**1149.2 In the canyons**

**1149.3 In the Tri-Canyon area**

**1149.4 In Taylor Canyon and Wheeler Creek**

**1149.5 On the west side of Mount Ogden**

**Responses:** The range of alternatives presented in the FEIS provide management prescriptions which either allow or do not allow a range of recreation development,

vegetation treatments, and trail and road building on the forest. A range of possible development or protection prescriptions are applied to each of these areas.

**1150. The Wasatch-Cache National Forest should prohibit commercial or amusement type development in the canyons because these services can be provided by cities within close proximity.**

**Response:** The Forest Service recognizes that some activities and developments are more appropriately and traditionally provided for on private lands than on National Forests. National, community, and individual values obviously vary on where to draw the line on these questions. Management prescriptions, scenery management, and recreation opportunity spectrum guidelines help frame what is allowable. Specific proposals will be compared to forest plan direction when they are presented, as well as to local site conditions, community needs, potential mitigation, and other manual and handbook direction.

**1151. The Wasatch-Cache National Forest should discourage unsightly development.**

**Response:** Scenery Management System (SMS) guidelines presented in Chapter 4 of the revised Forest Plan give direction for project proposals so that desirable developed and natural scenic settings are provided.

## **Economic Values**

### **Economic Values General**

**1152. The Wasatch-Cache National Forest should give economic considerations the lowest possible priority.**

**Response:** Economics is one of the many criteria considered in the decision making process. The level of importance economic values plays will depend upon issues and concerns of the public and the information desired by the decision maker.

**1153. The Wasatch-Cache National Forest should not preserve wild country for the short-term desires of a few.**

**Response:** Forest Plans are a balance between the many competing uses of national resources. The alternative selected will be a mix of preservation and resource uses with both short term and long term goals for resource conditions.

### **Adequacy of Analysis**

**1154. The Wasatch-Cache National Forest should strengthen its economic analysis.**

**1154.1 By separating different industries and communities**

**1154.2 By using more recent data**

**1154.3 By disclosing the real socio-economic impacts of the various alternatives**

**1154.4 By including information about the economic benefits of healthy forests**

**1154.5 By analyzing the economic benefits to local communities from motorized recreation**

**1154.6 By providing documentation to support its claim that backcountry areas are less expensive and more economically efficient to manage than designated wilderness**

**1154.7 By using the travel cost method and contingent valuation method to show a similarity of possible economic and social valuations associated with preserving the Wasatch-Cache mountain ecosystem**

**1154.8 By including information about externalized costs passed on to communities, businesses, and individuals when national forests are developed**

**Response:** Improvements have been made to the social and economic analysis in the FEIS to show individual industries and update to the most recent data available. It is difficult to always portray the economic data desired due to limited data sources and non-disclosure laws. There is generally a two-year lag with economic data between when it was collected and released for use. In terms of recreation use and expenditure data, it is often non-existent, available only at large scales (state-wide), or based on assumptions that do not match with Forest Service management or priorities.

Often an individual feels the greatest impact of an alternative or change in Forest Service management and such impacts are difficult to summarize at the large scale of a Forest Plan. The FEIS has been edited to show greater sensitivity between alternatives, but in many cases, there may be little difference. It is important to review the resource sections of the FEIS for more resource specific information concerning each area and alternative as well as the social and economic analysis.

The value of healthy forests can be found in summary tables of anticipated, measurable outcomes and activities by alternative in Chapter 2. Detailed discussions of each outcome can be found in the corresponding sections of Chapter 3 and 4. A balancing of all economic and non-economic outputs is best found in the Record of Decision. In that document, the Regional Forester discloses his consideration of outputs and outcomes that are monetarily valued (in the economic efficiency analysis) with others that do not have or cannot be monetarily valued.

With regard to 1154.6, the commenter inferred that the Forest Service had suggested that Wilderness management was more expensive than backcountry management for the Lakes roadless area, and that the Forest Service has an unfounded bias against Wilderness, that can in part be shown through unfounded perceptions that Wilderness management is comparatively expensive. We have reread of this section of the Need section of Appendix C (DEIS) or C-1 (FEIS) for Lakes. The statement does not unequivocally state that managing backcountry is cheaper than managing Wilderness. What the sentence states is, "This type of management" (meaning backcountry, not Wilderness) "could allow for more cost effective mitigation of human impacts..." The intent of the statement was not to assert a hard fact derived from an analysis of the cost differences of wilderness vs backcountry management, rather a simple suggestion that this might be the case.

Cost of management is not a compelling factor choosing between alternatives in this forest plan revision. The economic analysis of alternatives does keep constant budgets as an assumption across all alternatives.

The travel-cost method is one method to gather recreation expenditure data; the economic analysis used information readily available through Forest Service research to estimate recreation and tourism impacts to local communities. This analysis included motorized use, both OHV and snowmachines. For more information, see appendix B-11.

Externalities are not required to be included in the economic analysis: 36 CFR 219.12(g)3(i) directs that costs “of the agency and all other public and private costs required to manage the forest up to the point where the outputs are valued and the environmental consequences are realized” be included in the estimated effects of alternatives (emphasis added). Agency costs have been included in the FEIS Financial and Economic Efficiency analysis. Where there are significant private costs necessary to provide the valued outputs, they have been estimated and explicitly included in the efficiency analysis.

**1155. The Wasatch-Cache National Forest should strengthen its cost/benefits analysis.**

**1155.1 By providing a full accounting of benefits and costs, including “nonuse” benefits**

**1155.2 By comparing the management of roadless areas as wilderness versus the proposed management**

**Response:** The Implementing regulations of NEPA expressly avoids a cost-benefit analysis as being a necessary basis for decisions: ‘For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations.’ (40 CFR 1502.23) A cost-benefit analysis, however, may be conducted if desired or required by other laws, regulations, or directives. Economic impacts, however, are a concern of NEPA, but only where such issues have been identified during scoping. The economic section of the FEIS includes PNV and distribution analyses as required.

Non-use benefits: Summary tables of anticipated, measurable outcomes and activities by alternative can be found in Chapter 2. Detailed discussions of each outcome can be found in the corresponding sections of Chapter 3 and 4. A balancing of all economic and non-economic outputs is best found in the Record of Decision. In that document, the Regional Forester discloses his consideration of outputs and outcomes that are monetarily valued (in the economic efficiency analysis) with others that do not have or cannot be monetarily valued.

Even Wilderness areas require budget for management, and none of the alternatives designate the entire Forest or all roadless areas as Wilderness so a budget will still be needed outside of Wilderness for management and forest stewardship projects.

**1156. The Wasatch-Cache National Forest should provide an accounting of costs associated with various activities.**

**1156.1 Timber harvest**

**1156.2 Grazing**

**Response:** The costs and benefits of resource uses of the national forest are highlighted in the FEIS in resource sections as well as within the social and economic section.

**1157. The Wasatch-Cache National Forest should revise or eliminate the net public benefits discussion.**

**1157.1 Because the 50-year time frame is meaningless**

**1157.2 Because it is based on faulty assumptions**

**Response:** A PNV analysis is required by the National Forest Management Act (36 CFR 219) the FEIS analysis has been clarified.

**1158. The Wasatch-Cache National Forest should establish accurate benchmarks for the net public benefits analysis.**

**Response:** Benchmarks required by 39 CFR 219.12 (e) (1) were determined during the development of the 1985 Forest Plan, and were specified in the Chapter II, sections D, E, and F in the FEIS of November 2, 1984, and are summarized in the Preliminary Analysis of the Management Situation (April 1999). Our analysis in this forest plan revision has not recalculated those original benchmarks in revising the forest plan. Benchmarks, being minimum level of forest management to maintain the Forest and maximum production potential of significant goods and services (including associated monetary estimates of values) within which alternatives must be constructed are extremes. These extreme output levels are not approached or exceeded in the alternatives analyzed in the FEIS.

**1159. The Wasatch-Cache National Forest should establish an analytical process to demonstrate that the final Forest Plan will maximize net public benefits.**

**Response:** RPA/NFMA and implementing regulations outline the economic analysis and criterion requirement for forest planning, the commenters misunderstand the 'net public benefits' analytical framework prescribed by 36 CFR 219. 'Net public benefits' is not a benefit-cost analysis given a comprehensive economic efficiency framework – one that incorporates a monetary expression of all known market and non-market benefits and costs. Such an analysis is generally used when economic efficiency is the sole or primary criterion upon which a decision is made. The Forest Service does not endorse or expect this use of economic efficiency analysis in projects, programs, or other analyses. The agency recognizes that many of the values associated with natural resource management are best handled apart from, but in conjunction with, a more limited benefit-cost framework. This concept is expressed in NFMA regulations [36 CFR 219] and is referred as 'cost-efficiency.' When discussing the evaluation of Forest Plan alternatives, the regulations state that the evaluation 'shall compare present net value, social and economic impacts, outputs of goods and services, and overall protection and enhancement of environmental resources' [36 CFR 219.12(h)]. It is



this process that results in a Forest Plan that ‘maximizes long term net public benefits in a environmentally sound manner’ [36 CFR 219.1].

The NFMA regulations define net public benefits as: ‘An expression used to signify the overall long-term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs) whether they can be quantitatively valued or not. Net public benefits are measured by both quantitative and qualitative criteria rather than a single measure or index [36 CFR 219.3].’

Such an approach is reasonable given the vast array of environmental, social, and economic considerations in establishing or revising a Forest Plan. It is also consistent with the definition of multiple use as given in the MUSY Act.

The Forest Service Manual and Handbook system agrees with this approach. FSH 1909.17, section 10 calls for economic efficiency analysis for all projects. Section 11 clarifies the analysis required. A pure economic efficiency analysis includes all benefits and costs in monetary, and therefore, maximizing present net value yields the same results as maximizing net public benefits. However, in most planning conditions all benefits and costs cannot be monetarily valued. Under this circumstance, maximizing present net value is not the same as maximizing net public benefits, and the handbook recommends the use of ‘cost-efficiency’ to satisfy these requirements. FSM 2430 and FSH2409.18 also focus on the concept of ‘cost-efficiency’ rather than pure economic efficiency.

**1160. The Wasatch-Cache National Forest should quantify ecosystem service values and externalized costs of commodity production in the net public benefits analysis.**

**Response:** Externalities are not required to be included in the economic analysis: 36 CFR 219.12(g)3(i) directs that costs “of the agency and all other public and private costs required to manage the forest up to the point where the outputs are valued and the environmental consequences are realized” be included in the estimated effects of alternatives (emphasis added). Agency costs have been included in the FEIS Financial and Economic Efficiency analysis. Where there are significant private costs necessary to provide the valued outputs, they have been estimated and explicitly included in the efficiency analysis.

There are many values associated with National Forests that cannot be expressed in monetary terms. Many values are highly personal and subjective in nature. These values include connections of people, circumstances, time and place that occur on the National Forests. An example may be an annual family trip to a certain scenic vista using their off-highway vehicle on a favorite designated route. Monetary expressions are poor measures for the moment and the reflection of such multi-faceted values. These, however, may be the greatest value of National Forests to the nation.

Other values can and have been expressed in monetary terms in the economics literature. Existence, option, and bequest values are among the kinds of values that have been expressed in monetary terms. Typically, a study is focused on a particular kind of value for a particular geographic location and a specific population. The results are valid for that specific location and population, but may not be transferable to all situations. Thus, a study in the southern Rockies or the Pacific Northwest may not be applicable to the Wasatch-Cache National Forest.

The economics literature clearly shows that people hold passive use values for a variety of conditions on the National Forests. These values are relevant to the management situation on the Wasatch-Cache, but the spectrum of values in the literature is not easily transferred to the programmatic analyses and decisions being made for the Wasatch-Cache. Although the Forest Service recognizes the validity and importance of these values, the existing literature is not sufficient to serve as a basis for monetary estimates of the management actions proposed by the Wasatch-Cache plan. Therefore, passive use values for such things as biological diversity and wildlife habitat must be taken into consideration in a qualitative sense.

Comments on the DEIS have suggested that the full value of the Wasatch-Cache National Forest should be included in any benefit-cost analysis. This value might include such things as ecosystem services, its place in our national heritage, and all capital improvements. This kind of analysis would be appropriate if the decision in a forest plan revision was to retain or eliminate the entire National Forest. The decisions made in a forest plan revision, however, are incremental. The decisions are not whether to keep or sell the Wasatch-Cache National Forest, but rather to make step-wise changes in the way it is managed. Consequently, it is the difference between the 'no action' alternative and the other alternatives that offers insight into the benefits and costs of each course of action.

The values mentioned above are often discussed in the biological, physical, recreational, or cultural sections of the FEIS. Their consideration is also documented in the Record of Decision. Because such values are not expressed in monetary terms and therefore not included in the economic efficiency analysis does not mean that they have been excluded from the calculus of 'net public benefits'. Present net value is determined in part from benefits that can be expressed monetarily, but this is only a portion of all the values associated with the Wasatch-Cache National Forest.

#### **1160.1 Incorporate information from The Economic Case against National Forest Logging**

**Response:** Any policy regarding the subsidization of industries is not within the scope of the forest plan revision. While the Wasatch-Cache National Forest is concerned with effects on jobs in communities as it relates to Forest management, it has no policy to protect jobs in selected industries.

The timber industry is often singled out as receiving favored treatment by the Forest Service. Throughout the last decade, numerous mills in the Intermountain Region have closed while others have reconfigured to process smaller loges. International and national market forces now affect mills in the country more directly than ever before. There is a continuing demand for timber products in this country, and National Forests play an important role in supplying timber to meet the demand. The Wasatch-Cache National Forest historically has not been a large supplier of timber, but provides modest volumes of logs and wood fiber that are processed at local and regional mills in Utah, Idaho and Wyoming.

Timber from the Wasatch-Cache National Forest is sold at market rates. Timber prices fluctuate from year to year, as influenced by market forces. Depending upon conditions, some firms purchase National Forest timber at prices above their production costs while others purchase timber below their production costs. Timber analysis in this FEIS used historic market prices, adjusted annually for projected real price increases.

While the Forest Service in general and this Forest Plan in particular does not subsidize the timber industry with below-market prices, it has a keen interest in maintaining industry viability within the region. A local timber industry provides land managers and taxpayers with cost-effective options for treating vegetation to achieve 1) reduced risk of wildfires and insects and 2) improved forest health.

**1161. The Wasatch-Cache National Forest planning documents should incorporate ecosystem service values and externalized costs.**

**1161.1 In order to comply with the Multiple Use and Sustained Yield (MUSY) Act**

**1161.2 In order to comply with the National Environmental Policy Act**

**1161.3 In order to comply with the Forest and Rangeland Renewable Resources Planning Act and the National Forest Management Act (NFMA)**

**1161.4 In order to comply with the Administrative Procedures Act**

**1161.5 In order to comply with the Economic and Social Analysis Handbook**

**1161.6 In order to comply with the Timber Sale Preparation Handbook**

**1161.7 In order to comply with the Forest Service Manual**

**Response:** MUSY calls for management of the National Forests ‘with consideration being given to the relative values of the various resources.’ There is no requirement for such values to be monetarily expressed.

RPA/NFMA and implementing regulations outline the economic analysis and criterion requirement for forest planning, the commentors misunderstand the ‘net public benefits’ analytical framework prescribed by 36 CFR 219. ‘Net public benefits’ is not a benefit-cost analysis given a comprehensive economic efficiency framework – one that incorporates a monetary expression of all known market and non-market benefits and costs. Such an analysis is generally used when economic efficiency is the sole or primary criterion upon which a decision is made. The Forest Service does not endorse or expect this use of economic efficiency analysis

in projects, programs, or other analyses. The agency recognizes that many of the values associated with natural resource management are best handled apart from, but in conjunction with, a more limited benefit-cost framework. This concept is expressed in NFMA regulations [36 CFR 219] and is referred to as ‘cost-efficiency.’ When discussing the evaluation of Forest Plan alternatives, the regulations state that the evaluation ‘shall compare present net value, social and economic impacts, outputs of goods and services, and overall protection and enhancement of environmental resources’ [36 CFR 219.12(h)]. It is this process that results in a Forest Plan that ‘maximizes long term net public benefits in an environmentally sound manner’ [36 CFR 219.1].

The NFMA regulations define net public benefits as: ‘An expression used to signify the overall long-term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs) whether they can be quantitatively valued or not. Net public benefits are measured by both quantitative and qualitative criteria rather than a single measure or index [36 CFR 219.3].’

Such an approach is reasonable given the vast array of environmental, social, and economic considerations in establishing or revising a Forest Plan. It is also consistent with the definition of multiple use as given in the MUSY Act.

The FS Manual and Handbook system agrees with this approach. FSH 1909.17, section 10 calls for economic efficiency analysis for all projects. Section 11 clarifies the analysis required. A pure economic efficiency analysis includes all benefits and costs in monetary, and therefore, maximizing present net value yields the same results as maximizing net public benefits. However, in most planning conditions all benefits and costs cannot be monetarily valued. Under this circumstance, maximizing present net value is not the same as maximizing net public benefits, and the handbook recommends the use of ‘cost-efficiency’ to satisfy these requirements. FSM 2430 and FSH2409.18 also focus on the concept of ‘cost-efficiency’ rather than pure economic efficiency.

The Implementing regulations of NEPA expressly avoid a cost-benefit analysis as being a necessary basis for decisions: ‘For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations.’ (40 CFR 1502.23) A cost-benefit analysis, however, may be conducted if desired or required by other laws, regulations, or directives. Economic impacts, however, are a concern of NEPA, but only where such issues have been identified during scoping.

With regard to the Administrative Procedures Act, there have been no violations of law, regulation or procedure, as noted above, and thus the process for this Forest Plan is not arbitrary, capricious, or unreasonable.

**1162. The Wasatch-Cache National Forest should resolve the discrepancy in timber employment numbers presented in the Draft EIS.**

**Response:** Thank you for your comment, the FEIS has been edited to ensure employment numbers between sections are consistent, or if reporting different types of employment, that the text clarifies the differences between the sections.

Economic Impacts

**1163. The Wasatch-Cache National Forest should address the important economic contribution of various activities.**

**1163.1 Grazing**

**1163.2 Recreation and tourism**

**1163.3 Motorized use**

**Response:** The social and economic section in the FEIS highlights the contribution and potential impacts of each forest resource program. Specific output and resource information is available in specific resource sections of the FEIS.

**1164. The Wasatch-Cache National Forest should acknowledge that national forests do not contribute significantly to the agricultural economy.**

**Response:** The social and economic section of the FEIS highlights the contribution and potential impact of the agricultural sector to the analysis area economy.

**1165. The Wasatch-Cache National Forest should acknowledge that the value of one particular job is of no greater relative import than another job and that local economies are generally very elastic.**

**Response:** While the Wasatch-Cache National Forest is concerned with effects on jobs in communities as it relates to Forest management, it has no policy to protect jobs in selected industry. The social and economic section of the FEIS highlights the importance of Forest outputs local economies to communities within the analysis area.

Funding

**1166. The Wasatch-Cache National Forest should formulate its budget to reflect the fact that recreation is the number one use of the forest.**

**Response:** The recreation section of the FEIS highlights the trends and use on the Wasatch-Cache for recreation and tourism activities. The social and economic section highlights the contribution and potential impacts of this activity on the analysis area economy.

## Subsidies

### **1167. The Wasatch-Cache National Forest should not subsidize commercial industries or development.**

**Response:** “Below-cost” management is not uncommon for national forests (with respect to timber sales, grazing and recreation management) as cost is not the only driver in determining what is appropriate management for an area. Most often, commercial ventures and proposals for the national forest are made because they are profitable for the operators. The Forest Service often makes operators bear the costs of environmental analyses associated with proposals. Commercial activities on national forests are carefully scrutinized in terms of their environmental, social and economic or business consequences.

### **1168. The Wasatch-Cache National Forest should require user groups to restore the forest to properly functioning condition by requiring industries to pay a bond before issuing any extractive permits.**

**Response:** Permittees and contractors on national forest lands have to meet permit and contract requirements which include a performance bond, and in permits and contracts there are specific clauses for protection from and mitigation of effects to vegetation, soils, chemical use, litter and garbage, etc, associated with their activities. Requiring these groups to recover properly functioning condition (PFC) across broad areas of the forest is not something that has been done. The attainment of PFC (a relatively new concept in land management) is something that will likely take considerable time and integrated management and endeavors of both private user groups (commercial and non-commercial) and federal, state, and local governments.

### **1169. The Wasatch-Cache National Forest should require lost or injured recreationists to pay for rescue efforts.**

**Response:** While this question is outside the scope of forest plan revision, injured or lost recreationists can be billed if a medical helicopter is used in their rescue. Most often rescue is done by a County or State crew using the equipment necessary to complete the search and evacuation and the Counties bear this expense. The Forest Service does not pay for these rescues, but individual employees can participate in the rescue efforts.

## **Lands, Real Estate, and Property Boundary Management**

### **Lands, Real Estate, and Property Boundary Management General**

### **1170. The Wasatch-Cache National Forest should modify the Federal land conveyances in the Forest Plan (p. 5–10) by not disposing of parcels with inefficient configurations.**

**Response:** Parcels of federal land with inefficient configurations are often the subject of degradation, trespass, or otherwise negatively affected, as they cannot be managed consistent with the land management goals of a larger block of federal

land. These irregular parcels can be surrounded or influenced by lands under other ownership that are managed for very different intentions.

**1171. The Wasatch-Cache National Forest should wage a defense against interest claims it believes to be without merit.**

**Response:** While this comment is generally outside the scope of forest plan decisions, the Forest Service does carefully scrutinize claims that are made regarding agency land so that the public lands are protected against unfounded assertions.

**Land Purchases and Exchanges**

**1172. The Wasatch-Cache National Forest should add the Cache Valley foothills to its acquisition list to prevent further development**

**Response:** Landownership adjustment direction at the forest plan level is usually best stated in general terms across the forest without specifically mentioning individual tracts or areas. While such a disclosure might be desirable disclosure to those interested in knowing how the forest is approaching these ownership problems, detailed specificity often can alarm local landowners, escalate prices/values of lands and create unnecessary problems.

**1173. The Wasatch-Cache National Forest should acquire additional private lands.**

**1173.1 To protect multiple resources**

**1173.2 To protect moose habitat**

**1173.3 To preserve watersheds**

**Response:** These three types of settings are generally included in the priority land acquisitions presented in the revised Forest Plan. The ability of the Forest Service to acquire these lands is based on funding, the gravity of the need for acquisition, and other emphases that can affect the completion of a transaction.

**1174. The Wasatch-Cache National Forest should eliminate all private inholdings in roadless areas.**

**Response:** Isolated private parcels within roadless areas can create some management difficulty or controversy if landowners need to develop a road into the parcels or otherwise develop the area they own. The Forest Service recognizes the desirability of blocking up ownership. This can often work to the advantage of both the private landowners and the government.

**1175. The Wasatch-Cache National Forest should consider additional land exchanges with public input.**

**Response:** The Forest Service is considering more land exchanges and does involve the public through NEPA scoping and process for land exchanges and by complying with the Federal Land Exchange Facilitation Act (1988).

**1176. The Wasatch-Cache National Forest should not exchange lands within the Tri-Canyons.**

**1176.1 That would compromise watershed health and wildlife**

**1176.2 That would create developable private property**

**Response:** The forest recognizes the sensitivity of public sentiment concerning land development and land values in the Tri-Canyons. The revised Forest Plan identifies priority acquisitions and conveyances in its management direction. Riparian areas, areas valuable to wildlife and for watershed protection are identified as high value for acquisition. Conversely, they would not be easily traded out of public ownership.

**1177. The Wasatch-Cache National Forest should acquire private lands within Tri-Canyons wilderness additions that would prevent mining and development.**

**Response:** A wide range of alternatives are presented with respect to recommendations for Wilderness in the Tri-Canyons. Part of the evaluation of potential for Wilderness is based on an area's availability, that is, what liens are on the parcel which might make it less desirable as Wilderness. Clearly, active mineral claims and rights in a roadless area would make it less suitable as Wilderness. If a decision is made that recommends Wilderness that has private lands with private minerals, it could be in the interest of the Forest Service (and the American people) to pursue this ownership.

**1178. The Wasatch-Cache National Forest should not add land acquisitions on the North Slope of the Uintas to the existing wilderness area.**

**Response:** Management direction and/or wilderness recommendations for lands outside federal ownership are not part of this forest plan decision and are outside its scope of considerations.

**Access**

**Access to Forest Lands**

**1179. The Wasatch-Cache National Forest should acquire more access rights-of-way across private lands. Motorized access is also important.**

**Response:** Acquiring or providing for access and rights-of-way are identified as Priority 1 acquisitions in the revised Forest Plan. While the plan is silent on motorized or non-motorized use, both would be needed.

**1180. The Wasatch-Cache National Forest should institute boundary closures for private property owners who block access to public lands.**

**Response:** The revised Forest Plan has a standard on Roads, Trails and Access Management that addresses this question.

**1181. The Wasatch-Cache National Forest should establish a motorized access right-of-way across Thousand Peaks Ranch.**

**Response:** Identification of site-specific rights-of-way that could be acquired is not part of this forest plan decision. General direction on the priorities for



acquisition and conveyance are identified, and access to the forest is considered a Priority 1 need.

**1182. The Wasatch-Cache National Forest should establish a public access right-of-way in the northern Wellsvilles.**

**Response:** See response 1181.

**1183. The Wasatch-Cache National Forest should build an access road through the private property to the north point of Sardine Mountains to allow access to the Sardine Mountains**

**Response:** See response 1181.

**1184. The Wasatch-Cache National Forest should acquire a public foot trail access right-of-way to the Mollen's Hollow Research Natural Area to allow botanists access for plant community research.**

**Response:** Part of the reason that the Mollen's Hollow RNA has intact vegetation is because access into the area has been limited. Private lands along the western boundary of the area do not permit easy access from that side, and the Forest Service has not acquired public rights of way or easements from there. The area is accessible from the east off Forest Roads 059 to 221, but this access is not easy. Research scientists can come into the area from this direction to do research.

**1185. The Wasatch-Cache National Forest should secure a permanent access easement for non-motorized users south of Hardware Ranch.**

**Response:** See response 1181.

Access to Private Inholdings

**1186. The Wasatch-Cache National Forest should process easement applications in a timely fashion for inholders.**

**Response:** The administration and processing of easement applications is not a forest plan decision. However, we recognize the validity of your statement and have passed it on to our lands people and forest management.

Other

**1187. The Wasatch-Cache National Forest should replace "add specifics" in the proposed Forest Plan with the intended language.**

**Response:** This section of the Response to Issue 4 has been rewritten in the FEIS.

## Letters from Other Government Agencies

Copies of letters and oral comments from other federal, state, and local agencies are reproduced in this section. No letters were received from American Indian tribes.

Letters and comments reproduced here were from:

### Federal Government

Congressman James V. Hansen, U.S. House of Representatives, Committee on Resources  
USDI, Office of Environmental Policy and Compliance, Denver  
USDI, Bureau of Reclamation, Upper Colorado Region, Provo Area Office  
US Environmental Protection Agency, Denver  
USDA, Natural Resources Conservation Service, Snow Survey Office, Salt Lake City

### State Government

State of Wyoming, Office of Federal Land Policy  
State of Wyoming, Department of Agriculture, Ron Micheli (transcription of oral comment)  
State of Utah, Governors Office of Planning and Budget

### Local Government

Cache County, Utah  
Summit County, Utah  
Salt Lake County, Utah, Parks and Recreation  
Uinta County, Wyoming, County Commission, Bob Stoddard (transcription of oral comment)  
Ogden, Utah, City Council  
Ogden, Utah, Community and Economic Development Department  
Salt Lake City Corporation, Department of Public Utilities