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1. Purpose of and Need for Action

The Forest Service prepared this Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. This Environmental Impact Statement discloses the direct, indirect, and cumulative environmental impacts that would result from the proposed action and alternatives.

1.01 DOCUMENT STRUCTURE

The document is organized into the following chapters and sections:

- **Chapter 1** (Purpose of and Need for Action): briefly describes the proposed action, the need for that action, and other purposes to be achieved by the proposal. It also details how the Forest Service informed the public of the proposed action and how the public responded.
- **Chapter 2** (The Alternatives): provides a detailed description of the agency's proposed action as well as alternative actions developed in response to comments raised by the public during scoping. It includes summary tables comparing the proposed action and alternatives with respect to their environmental impacts.
- **Chapter 3** (Affected Environment and Environmental Consequences): describes the environmental impacts of the proposed action and alternatives.
- **Chapter 4** (Consultation and Coordination): provides a list of preparers and agencies consulted during the development of the EIS.
- **Index**: provides page numbers by document topic.
- **Appendices**: provide more detailed information to support the analyses presented in the EIS.

Additional documentation, including more detailed analyses of project area resources, may be found in the project record located at:

Stanislaus National Forest
Forest Supervisor's Office
19777 Greenley Road
Sonora, CA 95370

1.02 BACKGROUND

Over the past few decades, the availability and capability of motor vehicles, particularly off-highway vehicles (OHVs) and sport utility vehicles (SUVs) increased tremendously. Retail sales of all-terrain vehicles (ATVs) and OHVs between 1993 and 2006 jumped almost threefold nationwide. The number of ATVs in the United States represents about 70% of the total number of OHVs, not counting full-size 4-wheel drive vehicles. Based on the latest data (2005-2007), nearly one in five Americans (19.2%) ages 16 and older participated one or more times in OHV recreation within the past year. California is experiencing the highest level of OHV use of any state in the nation with 4,986,000 OHV participants or about 18% of the total population (Cordell 2008)¹. A total of 786,914 ATVs and OHV motorcycles were registered in 2004, an increase of 330% since 1980. Annual sales of ATVs and OHV motorcycles in California were the highest in the U.S. for the last 5 years.

Unmanaged OHV use resulted in unplanned roads and trails, compaction, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Riparian areas and aquatic dependent

¹ Sources: NSRE 1999-2004. Versions 1-16, except 3, 6, 12. NSRE 2005-2007, Versions 2 and 3.

species are particularly vulnerable to unmanaged OHV use. Unmanaged recreation, including impacts from OHVs, is one of “Four Key Threats Facing the Nation’s Forests and Grasslands” (see <http://www.fs.fed.us/projects/four-threats>).

On August 11, 2003, the Pacific Southwest Region of the Forest Service entered into a Memorandum of Intent (MOI) with the California Off-Highway Motor Vehicle Recreation Commission and the Off-Highway Motor Vehicle Recreation Division of the California Department of Parks and Recreation. That MOI set in motion a region-wide effort to “*Designate OHV roads, trails, and any specifically defined open areas for motorized vehicles on maps of the 19 National Forests in California by 2007*” (project record).

On November 9, 2005, the Forest Service published final travel management regulations (70 Federal Register 216, November 9, 2005; p. 68264-68291). Subpart B of the final Travel Management Rule (36 CFR 212), requires designation of those roads, trails, and areas that are open to motor vehicle use on National Forests. Only roads and trails that are part of a National Forest Transportation System (NFTS) may be designated for motorized use. Designations are made by class of vehicle and, if appropriate, by time of year. Part 261 – Prohibitions, Subpart A (36 CFR 261.13) of the final rule prohibits the use of motor vehicles off designated roads, trails and areas, as well as use of motor vehicles on roads and trails that is not consistent with the designations. All of the National Forests, including the Stanislaus, must complete travel management planning and any associated needed changes to their individual transportation systems by 2010.

On the Stanislaus National Forest, long managed as open to cross country motor vehicle travel, repeated use resulted in unplanned and unauthorized roads and trails. These routes generally developed without environmental analysis or public involvement. These routes do not possess the same status as roads and trails included in the NFTS. Nevertheless, some unauthorized routes are well-sited, provide excellent opportunities for outdoor recreation by motorized and non-motorized users, and would enhance the NFTS. Other unauthorized routes are poorly located and cause unacceptable impacts. Only NFTS roads and NFTS motorized trails can be designated for motor vehicle use. In order for an unauthorized route to be designated, the route must first be added to the NFTS.

In 2006, the Stanislaus completed an inventory of unauthorized routes on National Forest System (NFS) lands as described in the MOI and identified approximately 230 miles of unauthorized routes. The 2006 Inventory also showed 61.2 miles of unauthorized use on Maintenance Level 1 roads closed to the public. The Stanislaus used an interdisciplinary process to conduct travel analysis that included working with the public to identify proposed changes to the existing NFTS. Roads and motorized trails currently part of the NFTS and open to motor vehicle travel will remain designated for such use except as described below under the Proposed Action. This proposal makes needed changes (vehicle restrictions, additional motorized trails, etc.) to the NFTS in accordance with the Travel Management Rule (36 CFR 212, Subpart B).

In accordance with Subpart B of the Travel Management Rule (36 CFR 212.56), following a decision on this proposal, the Stanislaus will publish a Motor Vehicle Use Map (MVUM) designating all NFTS roads and trails open to motor vehicle use. The MVUM shall specify the classes of vehicles and, if appropriate, the time of year for which motor vehicle use is designated. Upon publication of the MVUM, it is prohibited to possess or operate a motor vehicle on NFS lands other than in accordance with those designations. These maps will be made available to the public on the internet and at the headquarters of the corresponding administrative unit and Ranger Districts of the National Forest System. The unauthorized routes (roads and motorized trails) not included in this proposal are not precluded from future consideration for either removal from the landscape and restoration to the natural condition or addition to the NFTS and inclusion on an MVUM. Future decisions associated

with changes to the NFTS and MVUM are dependent on available staff and resources and may trigger the need for additional environmental analysis, public involvement and documentation.

Travel Management on the Stanislaus National Forest

The Stanislaus National Forest currently manages approximately 2,947 miles of NFTS roads and 85 miles of NFTS motorized trails. About 2,279 miles of those NFTS routes are open to public motor vehicle use. The NFTS, developed over many decades, meets a variety of needs including timber management, fuel treatment, access to private inholdings, fire control, utility management, special uses management and recreation. The NFTS provides the public with many opportunities to enjoy the National Forest including OHV riding, access to recreation sites, access to trailheads, and access for harvesting special forest products such as firewood, greenery, mushrooms and plants.

The Forest Service manages and maintains the NFTS to various road and trail standards depending on management objectives. These range from paved roads to roughly graded high clearance roads and motorized trails, depending on the type of access necessary. In some cases, where public access is not needed, roads are “stored” for future management use. The Forest Transportation Atlas displays the NFTS. The initial atlas consisted of the maps, inventories and plans for forest transportation facilities and associated information available as of January 12, 2001 (FSM 7711.2). The Forest maintains details concerning the management of individual roads and motorized trails in the Forest Infrastructure Database (INFRA).

Although the term Transportation Atlas originated in 2001, the INFRA database originated in the late 1990s with data imported from the previous road inventory database (Transportation Information System). The spatial data part of the initial atlas first consisted of quad maps in 2001 and since converted to computer-based Geographical Information System (GIS) layers from which roads and motorized trail maps are now produced. Both the tabular database residing in INFRA and the spatial database in the GIS layers are updated continuously as features and conditions change, as new information is found and as new management decisions are made.

In 2002, the Stanislaus National Forest populated the INFRA database by examining previous records (maintenance plans, maintenance expenditures, existing road and trail atlases, forest maps, etc.) in order to capture the entire NFTS. The process transferred the necessary information into INFRA and verified the Forest Transportation Atlas. Roads or trails without record of being mapped or maintained for a specific use were not included in the NFTS.

Since then, adjustments to the Transportation Atlas and INFRA database corrected errors and account for NFTS roads either newly constructed or overlooked in the 2002 effort. The current Forest Transportation Atlas identifies the existing NFTS and the road and trail management objectives for each transportation facility or route. Decisions regarding changes to the NFTS (new road construction, realignment, decommissioning, etc.) are subject to NEPA and require public involvement and disclosure. The NFTS is always changing depending on resource needs and management concerns

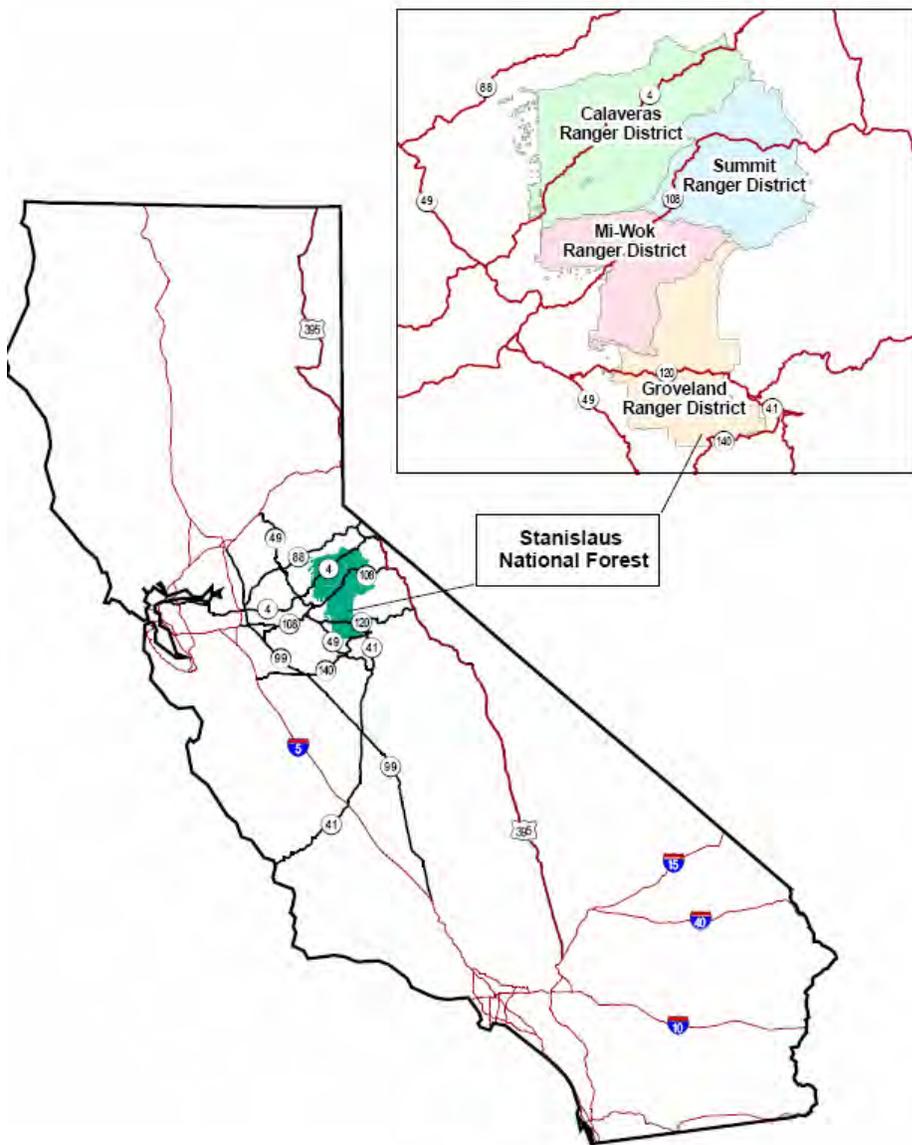
This travel management proposal is just one of many in a continuing effort to manage the NFTS to meet current and future needs. Previous plans and projects (forest planning, vegetation management, watershed restoration, fuels treatments, trail construction, trail management, landscape analysis, watershed analysis, roads analysis, etc.) resulted in decisions that reduced or added NFTS miles available for motor vehicle use. Some of those decisions resulted in new road construction, new trail construction and adding unauthorized routes to the NFTS. Other decisions resulted in 21.2 miles of roads closed and 488.7 miles of road decommissioned. The project record contains a list of these routes and the associated projects. All of these efforts contributed to sustainable management of the NFTS on the Stanislaus National Forest.

Other ongoing efforts include: project-specific efforts to reduce the impacts from unauthorized routes and from the current NFTS through the Forest's road operation and maintenance program. Implementation of this project is only one step in the overall management of motor vehicle travel on the Stanislaus National Forest.

Project Location

The project location is the Stanislaus National Forest including all four Ranger Districts (see Figure 1.02-1). The Forest contains 898,099 acres located in the central Sierra Nevada. The Forest is bounded on the north by the Mokelumne River and the Eldorado National Forest; on the east by the Humboldt-Toiyabe National Forests and Yosemite National Park; on the south by the Merced River and the Sierra National Forest; and on the west by the Sierra foothills.

Figure 1.02-1 Stanislaus National Forest Vicinity Map



1.03 PURPOSE AND NEED

The Forest Service identified the following needs for this proposal:

1. **There is a need for regulation of unmanaged wheeled motor vehicle travel by the public.**

The proliferation of unplanned, unauthorized, non-sustainable roads, trails and areas created by cross-country travel adversely impacts the environment. The 2005 Travel Management Rule, 36 CFR, Section 212, Subpart B provides for a system of NFTS roads, NFTS motorized trails and areas on National Forest System lands that are designated for motor vehicle use. After roads, trails and areas are designated, motor vehicle use off designated roads and motorized trails and outside designated areas is prohibited by 36 CFR 261.13. Subpart B is intended to prevent resource damage caused by unmanaged motor vehicle use by the public. In accordance with national direction, implementation of Subpart B of the travel management rule for the Stanislaus is scheduled for completion in 2010.

2. **There is a need for limited changes to the National Forest Transportation System to:**

- a. **Maintain motor vehicle access to dispersed recreation opportunities (camping, hunting, fishing, hiking, horseback riding, etc.).** A substantial portion of known dispersed recreation activities are not typically located directly adjacent to NFTS roads or NFTS motorized trails. Some dispersed recreation activities depend on foot or horseback access, and some depend on motor vehicle access. Those activities accessed by motor vehicles are typically accessed by short spurs created primarily by the passage of motor vehicles. Many such unauthorized 'user-created' routes are not currently part of the NFTS. Without adding them to the NFTS and designating them on a MVUM, the regulatory changes noted above would make continued use of such routes illegal and would preclude access by the public to many dispersed recreation activities.
- b. **Provide a diversity of motorized recreation opportunities (4WD, motorcycles, ATVs, passenger vehicles, etc.).** It is Forest Service policy to provide a diversity of road and motorized trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability (FSM 2353.03(2)). Implementation of Subpart B of the Travel Management Rule will reduce acres available for cross country travel because this activity will be prohibited. Miles of motorized recreation opportunities relative to current levels could be negatively affected. As a result, there is a need to consider limited changes to the NFTS to provide motorized recreation opportunities.

In making any limited changes to the NFTS, the Stanislaus will consider criteria contained in Subpart B of the Travel Management Rule, which include the following:

- a. Impacts to natural and cultural resources.
- b. Public safety.
- c. Access to public and private lands.
- d. Availability of resources for maintenance and administration of roads, trails and areas that would arise if the uses under consideration are designated.
- e. Minimizing damage to soil, watershed, vegetation, and other forest resources.
- f. Minimizing harassment of wildlife and significant disruption of wildlife habitat.
- g. Minimizing conflicts between motor vehicles and existing or proposed recreational uses of NFS lands or neighboring federal lands.
- h. Minimizing conflicts among different classes of motor vehicle uses of NFS lands or neighboring federal lands.

- i. Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.

When making any changes to NFTS roads, the Stanislaus will also consider the following:

1. Speed, volume, composition and distribution of traffic on roads.
2. Compatibility of vehicle class with road geometry and road surfacing
3. Maintaining valid existing rights of use and access (rights-of-way)

Table 1.03-1 provides a summary of the Purpose and Need details related to the four components of the Proposed Action.

Table 1.03-1 Purpose and Need

What	Where	Why	How
1. Cross Country Travel			
Travel and Parking	forestwide outside of Wilderness	implement 36 CFR 212, Subpart B limiting motorized use to the NFTS system; protect resources by preventing route proliferation; provide parking	prohibit cross country travel; parking allowed one vehicle length off of NFTS routes unless otherwise prohibited
2. Additions to the NFTS			
Add existing unauthorized routes to the NFTS	specific routes (151.64 miles) described shown in Appendix I	provide variety of motorized trail opportunities; enhance loop opportunities; access destinations; reduce conflicts; most managed motorized trails	add unauthorized routes to the motorized trail system; on MVUM pending completion of mitigations
3. Changes to the Existing NFTS			
Convert NFTS roads to NFTS motorized trails	specific routes (62.17 miles) shown in Appendix I	road not maintained; don't need as road; road never physically closed; access popular destinations	remove from road system; add to motorized trail system; on MVUM
Change NFTS roads from Closed to Open	specific routes (67.37 miles) shown in Appendix I	existing NFTS roads; access destinations or private property; enhance loop opportunities by connecting motorized trails	open any existing gates or remove barriers as needed; on MVUM
Change NFTS Roads from Open to Closed	specific routes (45.98 miles) shown in Appendix I	protect facilities; not needed for recreation; reduce conflicts between different uses	close any existing gates
Change NFTS roads from Highway Legal Only (HLO) to All Vehicles (ALL)	specific routes (93.36 miles) shown in Appendix I	provide a variety of motorized mixed use opportunities; enhance loop opportunities by connecting motorized trails; reduce maintenance needs	on MVUM as open to all vehicles pending completion of combined use and mixed use mitigations
Change NFTS roads from ALL to HLO	specific routes (400.56 miles) shown in Appendix I	county roads; private property; short roads; no connection to non-highway legal opportunities; reduce incursions into adjacent non-motorized areas; reduce conflicts between different uses	on MVUM as open to highway legal only
Season of Use	forestwide outside of Wilderness	protect resources including road and trail surfaces during the normal winter season	all routes open by elevation zone; on MVUM
Wet Weather Closures	forestwide outside of Wilderness	protect resources including road and trail surfaces in storm events during the normal season of use	native surface routes are subject to closure when 1" rain occurs in a 24 hr period and allow 72 hrs drying; on MVUM
Wheeled Over Snow Routes	specific routes (105.92 miles) shown in Table 2.02-2	protect resources; provide variety of motorized winter recreation; reduce conflicts	open to ATVs with 12" or more of snow; on MVUM
4. Forest Plan Amendments			
Amendments	specific routes (10.36 miles); cross country travel prohibition	update cross country travel prohibition to comply with 36 CFR 212; allow continued existing motorized use	route specific exceptions allowing motorized routes; on MVUM

1.04 PROPOSED ACTION

This is the Proposed Action, as described in the Notice of Intent (72 Federal Register 222, November 19, 2007; p. 64988-64991), with corrections based on updated data and map information and refinements responding to the administration, motorized recreation, private property, recreation and resource issues raised during scoping. These corrections and refinements provide additional motorized recreation opportunities, reduce conflicts and provide additional resource protection.

Alternative 1 (Proposed Action) is the Forest Service preferred alternative.

1. **Cross Country Travel:** Motor vehicle travel off NFTS routes by the public would be prohibited except as allowed by permit or other authorization. Parking is allowed within one vehicle length² off of NFTS routes unless otherwise prohibited.
2. **Additions to the NFTS:** 151.64 miles of unauthorized routes would be added to the NFTS as motorized trails (see Table 2.05-2). Appendix I (Route Data) shows the specified vehicle class, season of use and mitigations.
3. **Changes to the existing NFTS:** Vehicle class changes would occur on 616.80 miles of NFTS roads. Season of use on *all routes* based on elevation and wet weather closures on *native surface routes* replaces existing seasonal closures and restrictions (see Table 2.02-7). Appendix I (Route Data) shows the specified vehicle class, season of use and mitigations.

Vehicle Class

Table 2.02-1 shows vehicle class changes would occur on 616.80 miles of NFTS roads including: opening 67.37 miles of closed roads; closing to public use 45.98 miles of open roads; converting 93.36 miles of roads from highway legal only to all vehicles; and, converting 400.56 miles of roads from all vehicles to highway legal only. This alternative also converts 62.17 miles of the 616.80 miles of NFTS roads to motorized trails (the mileage overlaps with the other changes described above and shown in Table 2.02-1 and Table 2.05-5).

Season of Use

Except as allowed by permit or other authorization (i.e. wheeled over snow routes), NFTS motorized routes are open to motorized use during the season of use shown below, unless specifically prohibited (see Figure 2.05-1). Roads open year round are not maintained for winter travel; however, they are available for over snow travel consistent with the vehicle class designation.

1. Lower Elevations Open year round
2. Middle Elevations Open April 1 – November 30
3. Upper Elevations Open May 15 – November 30

Wet Weather Closures: During the season of use, *native surface routes* are subject to wet weather closure when 1 inch of rainfall occurs in a 24 hour period and allowing for 72 hours of drying.

Wheeled Over Snow (WOS) Routes: wheeled over snow use is prohibited, except by ATVs when 12 inches or more of snow is present, on the routes listed in Table 2.02-2 (see Figure 2.05-1). These routes are dual designated as Snow Trails.

4. **Forest Plan Amendments:** includes the amendments shown in Tables 2.02-3, 2.02-4, and 2.02-5.

² Vehicle Length equals the length of the vehicle along with the trailer it tows.

1.05 PRINCIPLE LAWS AND REGULATIONS

The National Environmental Policy Act of 1969 (NEPA) requires that all major federal actions significantly affecting the human environment be analyzed to determine the magnitude and intensity of those impacts and that the results be shared with the public and the public given opportunity to comment. The regulations implementing NEPA further require that to the fullest extent possible, agencies shall prepare environmental impact statements concurrently with and integrated with environmental analyses and related surveys and studies required by the Endangered Species Act of 1973, the National Historic Preservation Act of 1966, and other environmental review laws and executive orders. Principle among these are the Multiple Use and Sustained Yield Act of 1960, the National Forest Management Act of 1976 as expressed through the Forest Plan, the Clean Air Act of 1955, the Clean Water Act of 1948 and the Forest and Rangeland Renewable Resources Planning Act of 1974.

Travel Management Rule (36 CFR 212, 251, 261 and 295): this Motorized Travel Management EIS is designed specifically to implement the requirements of the November 5, 2005 Rule for Travel Management, Subpart B.

1.06 DECISION FRAMEWORK

As the Responsible Official, the Forest Supervisor may decide to: (1) select the proposed action; (2) select one of the alternatives; (3) select one of the alternatives after modifying the alternative with additional mitigating measures or combination of activities from other alternatives; or, (4) select the no action alternative, choosing to take no action at this time to prohibit cross country motor vehicle travel by the public off the designated system and make changes to the existing Stanislaus NFTS.

1.07 PUBLIC INVOLVEMENT

The Interdisciplinary Team (IDT) relied on public involvement to ensure that a full range of alternatives, representing a broad array of perspectives, would be analyzed in this EIS. Public involvement occurred during four key periods: first, in 2003 when a group of concerned publics held a community forum to discuss OHV recreation on the Stanislaus National Forest over 150 individuals attended to identify issues and possible management solutions for OHV recreation (as a result of the forum, a group called the Stanislaus Recreation Stakeholders (SRS) formed with the Forest Service as an ad hoc member to discuss OHV and associated recreational issues); second, a broadened public collaboration process for Travel Management that began in 2005; third, during the 60-day public scoping period for the proposed action; and, fourth, during the 75-day public comment period on the DEIS.

In 2005, the Forest Service requested the SRS, with the assistance of the Center for Collaborative Policy, Sacramento State University, to serve as a design team to help develop the process for public involvement, identification of key stakeholders, and act as a sounding board for critical issues associated with motorized recreation. In 2007, they assisted in designing all the community “Discussion Proposal” workshops for the collaborative development of the Proposed Action, and designing the workshops for rolling out the Notice of Intent. In late 2005, the Forest held three public meetings in Sonora, Greeley Hill and Arnold, sharing the route designation process developed with the State of California MOI and OHV inventory process with 240 attendees. The Forest completed the OHV inventory in June 2006, with CD copies of the OHV Inventory mailed to 500 individuals.

In late 2006 and early 2007, the Forest held seven meetings and three open houses in Sonora, Greeley Hill, Arnold, and West Point presenting a series of “discussion proposals” to 340 attendees. The

Forest Service presented concepts at these “Discussion Proposal” workshops sharing maps, data and time to draw routes on maps, circle areas of concern, and accept written and verbal comments and ideas. District personnel also met with individuals and OHV clubs, identifying important motorized trails needed for the OHV recreation experience. The Forest conducted informal briefings with the Tuolumne Band of Mi-Wuks.

The Forest Service first listed the Motorized Travel Management project in the January 2007 issue of the Stanislaus National Forest Schedule of Proposed Actions (SOPA). The Forest distributes the SOPA to about 160 parties and it is available on the internet [<http://www.fs.fed.us/r5/stanislaus/projects/sopa>].

Public Scoping Period (60-days) for the Notice of Intent

On November 13, 2007 the Forest sent a scoping letter to 950 individuals, permittees, organizations, agencies, and Tribes interested in this project. The letter requested comments on the Proposed Action. The Forest Service published a Notice of Intent (NOI) that asked for public comment on the proposal between November 19, 2007 and January 18, 2008 (72 Federal Register 222, November 19, 2007; p. 64988-64991). In addition, as part of the public involvement process, the agency held five public meetings attended by 237 individuals and four open houses attended by fourteen individuals. In April, 2008, the Forest sent an informational mailing to the public, containing information on how to obtain a copy of the Scoping report. The SRS was instrumental in helping design the public meeting format, suggesting communication strategies, key stakeholder contacts, and meeting locations. The Forest developed the issues (Chapter 1.08) based on public comments submitted during the scoping period.

Public Comment Period (75-days) for the DEIS

On February 27, 2009 the Forest released the Motorized Travel Management Draft Environmental Impact Statement (DEIS) by mailing over 1,115 CDs to individuals, 90 CDs to organizations, county governments, and other agencies and 72 hard copies and CDs to organizations, county governments and tribes. The information was also posted on the Forest’s Website on February 27, 2009.

The Environmental Protection Agency published a Notice of Availability (NOA) for the DEIS in the Federal Register (Volume 74, Number 43; Page 9817-9818) on March 6, 2009 with a 60-day public comment period. On May 1, 2009 the Forest Supervisor extended the public comment period until May 20, 2009. The Forest held six workshops, five open houses and hosted one pilot Webinar where the public was invited to attend an Internet/Phone In meeting as part of the public involvement process. Approximately 175 persons attended these sessions. The Forest continued tribal consultation and briefed four County Boards of Supervisors or individual County supervisors. Congressional briefings were also conducted. The Forest sent out three additional post card mailings to notify the public of the comment period, additional meeting locations and times, and extension of the comment period.

In response to the Forest’s request for comments, 927 interested parties submitted 841 letters. The Forest documented and analyzed public comments using a process called content analysis. This is a systematic method of compiling the full range of public viewpoints and concerns regarding a plan or project. Content analysis ensures that every comment is considered. It facilitates the Forest’s response to comments and leads to good decision-making by helping the Forest to clarify, adjust or incorporate technical information into the final EIS.

Forest Service direction requires that final Environmental Impact Statements respond to substantive comments on the DEIS (FSH 1909.15, 24.1). Substantive comments are within the scope of the proposed action; are specific to the proposed action; have a direct relationship to the proposed action; and, include supporting reasons for the Responsible Official to consider (36 CFR 215.2).

The IDT reviewed all 841 letters and, for tracking purposes, assigned a letter number to each letter; and, an identification number to 3,123 specific comments. They reviewed each specific comment and

determined that 1,233 did not meet the substantive test and screened them as non-substantive comments. Then, they reviewed the remaining 1,890 specific substantive comments; combined similar comments into 489 summary statements grouped by 9 general topic areas; and, provided a response to each. The content analysis spreadsheet titled “Public Comments Summary Report” (project record) contains all 3,123 specific comments and identifies the reasons for those screened as non-substantive. That spreadsheet also includes respondents sorted by letter number and respondents sorted by identification number. Appendix J (Response to Comments) contains the 489 summary comment statements, organized by 9 general topics, along with the appropriate ID numbers, followed by the Forest Service response to each.

1.08 ISSUES

Comments from the public, other agencies, and the Tuolumne Band of Mi-Wuk Indians were used to formulate issues concerning the proposed action (Public Comment Summary, project record). An issue is a matter of public concern regarding the proposed action and its environmental impacts. Scoping identified issues which are a point of discussion, dispute, or debate with the Proposed Action. An issue is an effect on a physical, biological, social, or economic resource. An issue is not an activity; instead, the predicted effects of the activity create the issue. The Forest Service separated the issues into two groups: significant and non-significant. Significant issues are defined as those directly or indirectly caused by implementing the proposed action.

Significant Issues are used to formulate alternatives, prescribe mitigation measures, or analyze environmental effects. Issues are significant because of the extent of their geographic distribution, the duration of their effects, or the intensity of interest or resource conflicts. Non-Significant Issues were identified as those that were: 1) outside of the scope of the proposed action; 2) already determined through law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; 4) conjectural and not supported by scientific fact; 5) a comment, opinion, or position statement; or, 6) a question for clarification or information. Although non-significant issues are not used to formulate alternatives or prescribe mitigation measures, the EIS will disclose all significant environmental effects including any related to non-significant issues.

The Council on Environmental Quality (CEQ) NEPA regulations explain this delineation in Sec. 1501.7, “...identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)...” A list of non-significant issues and reasons why they were found non-significant may be found in the project record.

As described above, issues are significant because of the extent of their geographic distribution, the duration of their effects, or the intensity of interest or resource conflicts. The IDT used the following significant issue statements to formulate and compare alternatives, prescribe mitigation measures, or analyze and compare the environmental effects of each alternative. The significant issue statements identify elements (individual or groups of significant issue topics) along with a cause and effect based on public comments. Based on public comment, the IDT identified the significant issues shown in Table 1.08-1.

Table 1.08-1 Significant Issue Statements

Issue/Element	Cause and Effect
Significant Issue Statement 1: Changes to NFTS routes that reduce motorized opportunities, increase restrictions on vehicle class and season of use, and prohibit cross-country travel, may affect forest visitors.	
1.1 Motorized Opportunities ³	<ul style="list-style-type: none"> a. Changing the vehicle class and season of use may affect available camping opportunities. b. Route designations may not provide adequate motorized opportunities. c. Route designations may not provide adequate distinction between vehicle classes. d. Route designations may not provide adequate opportunities for motorized special use events. e. Vehicle class, season of use and cross-county travel restrictions may limit motorized access for big game retrieval and dispersed camping.
Significant Issue Statement 2: Changes to NFTS routes that increase motorized opportunities, reduce restrictions on vehicle class and season of use, and allow cross-country travel, may affect forest resources, private property and forest visitors.	
2.1 Administration	<ul style="list-style-type: none"> a. Increasing motorized use may result in increased non-compliance, unsafe conditions near private residences and unsafe encounters between forest visitors. b. Current and future budgets may not provide adequate funding for maintenance, administration and enforcement of the proposed road and motorized trail system. c. Route designations may cause environmental impacts requiring more maintenance. d. Allowing mixed use on system routes may result in unsafe recreation opportunities.
2.2 Private Property	<ul style="list-style-type: none"> a. Allowing motorized use near private property may result in noise, dust, trespass and other conflicts with private property owners. b. Some private property owners are unwilling to grant public right of way, thereby limiting motorized route opportunities.
2.3 Recreation	<ul style="list-style-type: none"> a. Increasing motorized use may result in noise disturbance affecting quiet recreation opportunities. b. Increasing motorized use may result in user conflicts between forest visitors.
2.4 Resources ⁴	<ul style="list-style-type: none"> a. Increasing motorized use may increase fire risk and the spread of noxious weeds. b. Increasing motorized use may affect heritage resources, recreation, sensitive plants, soils, vegetation, watershed and wildlife. c. Allowing motorized access for big game retrieval and dispersed camping may affect forest resources. d. Authorizing travel corridors allowing cross-country travel within 100' of roads and motorized trails, or allowing parking greater than one car length from the road may affect forest resources. e. Increasing motorized use may result in undesirable road densities. f. Proposed seasonal closures may not adequately protect natural resources g. Motorized use may not be compatible with Roadless Areas, Wild and Scenic Rivers, Wilderness and Yosemite National Park.

1.09 GIS DATA

The Forest Service uses the most current and complete data available. Geographic Information System (GIS) data and product accuracy may vary. They may be: developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those intended may yield inaccurate or misleading results.

The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. The information contained within Chapter 2 (The Alternatives) of this EIS takes precedence in case of disagreement with the GIS data (including maps created using that data).

³ This element groups significant issues from the Routes, Special Uses and Travel Corridor topics.

⁴ This element groups significant issues from the Resources, Routes, Special Areas, and Travel Corridor topics.

