

says about 7.7 percent of the Forest has been affected by harvesting. Page 3-105 of the DEIS says, "Only 3 percent (33,900 acres of 1,162,300 acres) of the forested cover type has been fragmented with clearcut/overstory-removal timber harvests."

The statement that Alternative NA has the "highest potential likelihood of altering the Forest" implies there may be some altering under this alternative. The table would have us believe Alternative NA has 74% of the Forest going contrary to ecological processes.

We believe that you are misinterpreting the table. It demonstrates that there are differences in the alternatives in land allocations where management activities can occur. It suggests that alterations of the landscape will occur where there is the potential for management.

It is true that all acres will not be affected, but the potential does exist. Also, if the alternatives are legally implementable, then mitigation measures will be in place and activities will be within acceptable ecological limits. The table portrays accurately each alternative's potential for alterations of the landscape.

- 21.165 Objective 2 Provide for a variety of life through management of ecosystems. This Plan promotes almost exclusively the promulgation of old-growth forests. There is a variety of life in some old-growth forests. There is also a variety of life in regeneration and thinned, managed timber stands. This has not been considered as contributing positively to this Objective in this Plan.**

We disagree. The Plan does speak to the old-growth component and the role it plays in Forest management. The Plan also addresses all other Forest components, and their roles in Forest management.

- 21.166 Objective 4 "Provide for scenic quality and a range of recreational opportunities that respond to the needs of Forest customers and local communities." This Objective does not seem to be met in this Plan, as it replicates the visual "sameness" of vast acres of old-growth forests. While these are attractive, the variety of landscape resulting in healthy and varied structural stages, managed in visually pleasing patterns, is of high scenic quality also.**

The indications in many parts of this Plan that a large fire will occur soon in the old growth and burn several thousand acres make one wonder what the future scenic quality will be for the RGNF under this Plan.

The Scenic Resource System applies to all areas of the Forest and provides for scenic quality in the Forest's managed areas. The Forest will not be duplicating vast acreages of old growth. Old growth takes at least 250 years to develop. We will be making vegetation management decisions within the framework of reference landscapes and the conditions that exist in them.

- 21.167 Objective 8 "Promote rural development opportunities." By "locking up" the majority of acres of this Forest in Wilderness-type management and emphasizing the appearance of no human intervention in all but the ski area Management Areas, it is difficult to understand how the promotion of rural development opportunities will occur under this Plan.**

We believe that the Revised Plan is very responsive to rural-development opportunities. Diversified rural economies are much stronger than those dependent on a single resource.

Application of Backcountry Prescriptions might be construed as "locking up", however, it can also be seen as putting something in the bank. It is still there if needed in the future.

**21.168 Objective 6 "Improve the financial efficiency of all programs and projects." This Objective is one that should result in a higher timber sale program. The soil is productive, the trees are there, they're growing, they're merchantable, there is a waiting market. If the trees aren't harvested they will burn up or be killed by insects or diseases.**

Yes, there is value to old trees and varied habitats, but selling the product on behalf of the taxpayers to return money to the federal treasury (and local schools) can be done in a financially efficient manner at a sustainable level far higher than was considered in any of the alternatives. This financial efficiency is not reflected in the RGNF draft planning documents.

We believe the Objective has been met in all alternatives. All of them feature above-cost timber programs except Alternative A (which has no timber program). The amount of harvest identified for each alternative is doable within our budget and personnel constraints. We do not believe that the efficiency of other programs should be sacrificed to emphasize the production of timber.

**21.169 There is no Theme stated for the No Action alternative, making it impossible to compare with the others. It would seem there were some pressing issues that [the RGNF attempted to solve] with management in the previous Plan. Management activities were set forth to increase water yield. Items like this could be reported in the Theme area so the public could see what the original Plan management was attempting to do.**

Your point is well taken. We were remiss in not including a theme statement for the No Action alternative. Inclusion of this alternative is a legal requirement and from our perspective self-explanatory, but you are correct that a theme statement would help explain the Objectives in the 1985 Plan. A theme statement has been written for the alternative and included in the Final Environmental Impact Statement.

**21.170 The statement that only 6% of the RGNF was allocated to recreation in the current Plan is misleading. The statement implies that recreation under the original Plan will only occur on 6% of the Forest. That is absurd.**

Your conclusion is based on a rather basic misinterpretation of the statement. It is true that 6% of the Forest (outside Wilderness) is allocated to a Prescription that emphasizes recreation. It is also true that recreation can occur on 100% of the Forest, regardless of land allocation, under the concept of multiple use.

**21.171 Disclosure of the exact management for the Forest road and trail system should be made rather than stating that it will not change. This will enable comparison of this alternative with the others more clearly.**

See Travel Management, Chapter III of the FEIS. Disclosure of the Forest road and trail system is included by alternative.

**21.172 The statement "There will be no loss of species" is made for every alternative except NA. By omitting the statement for this alternative it is implied that a loss of species will occur or is likely to occur. That is inconsistent with the statement that every alternative is legal and implementable under current laws and regulations. The DEIS does not indicate any species have been lost because of present management.**

No loss of species is anticipated in Alternative NA. Omission of the statement is an oversight that has been corrected. Alternative NA is legal and implementable under current laws and regulations.

- 21.173** In the overview of the NA Alternative, the current rate of "production" as stated in the DEIS (pg 2-3) is 14 MMBF. This is a statement giving half of the truth. With only 5.4 MMBF sold in FY 94, the current harvest will be declining rapidly from 14, and that trend should be disclosed. This DEIS statement the RGNF is currently "producing approximately 14 MMBF" has no time reference.

It would be more accurate to say the RGNF's harvest of timber is currently 14 MMBF per year. The amount of inventory, growth, and mortality on the Forest is necessary information and is not presented in the documents. This information would enable the public to realize how much timber the Forest is producing.

*You are distinguishing between the amount sold and the amount prepared for offer. The Forest prepared timber sales for offer to the tune of 14 MMBF. The difference between the amount prepared for offer and the amount actually sold is subject to circumstances beyond our control (legal action, primarily) inventory, growth, and mortality are all considered in harvest calculations for each alternative. This is background information that is part of the Planning Record on file in the Forest Headquarters in Monte Vista, Colorado.*

- 21.174** The DEIS states (pg. 2-16) that the 1985 FORPLAN model did not consider the cost of entering separate roadless areas. This is said to be one of three reasons why the harvest volumes were reduced after Judge Finesilver's decision. The 1985 FORPLAN model was said to be not available for this review so a direct comparison was not possible. By eliminating any budget constraints, however, the present model did not allow a higher level of harvest.

The cost of entering roadless areas does not affect the harvest volume in the FORPLAN model. Refer to the section of this report in the discussions of the FORPLAN model titled Stumpage Price and Budget Constraint for more discussion.

It is true that the 1985 FORPLAN model did not consider the cost of entering separate roadless areas. The 1985 model is not available, but the results of the FORPLAN runs are a matter of record.

*The cost of entering a roadless area is a major factor that affects the harvest volume in the FORPLAN model using an objective function of 'maximum PNV'. Your conclusion is in error.*

- 21.175** The statement that Alternative A "responds well to biological diversity" is questionable. It would be better stated that Alternative A has more acres allocated to Wilderness and to management activities that have no evidence of human intervention.

We disagree. The alternative allocates all of the unroaded areas (5,000 acres or greater) to recommended Wilderness. The Prescription would perpetuate all natural processes and accordingly "respond well to biological diversity." Using the term "management activities" would imply human intervention, so the sentence you suggest is not consistent with the alternative.

- 21.176** Within the Theme of several alternatives is stated the effect the alternative will have on the economy and quality of life in the San Luis Valley area. By omitting this item for Alternative A, a comparison cannot be made in this area.

The statement was omitted by oversight and has been corrected.

- 21.177** It is inconsistent that Alternative A has 360,784 acres in Management Prescription 5.11, General Forest and Rangelands, and that no lands will be designated suitable or

scheduled for timber harvest. The Standards and Guidelines for 5.11 indicate timber harvest will occur. The theme for 5.11 lists timber harvest as a management option.

Timber harvest will occur under the alternative, but will be done to meet other resource needs (such as wildlife habitat improvement) and funded accordingly. The alternative was framed around the concept of no suitable, scheduled timber harvest. Standards and Guidelines for MA 5 11 state that timber harvest can occur in the area, but do not stipulate that it must

- 21 178** In the event of a large fire, which is stated in the DEIS as increasingly likely to occur, Alternative A would result in a large stand-replacement burn--perhaps several hundred thousand acres or more. Indications of this are in its Theme of a "light touch" approach to management

The FS has failed to disclose the effects such a large burn would have on the ecosystem. Would it cause habitat of T&E species to be lost? Would it lower PNV or PNB? How would private land be affected? How would FS facilities be affected? Information of this type is missing from the analysis presented, and does not allow proper consideration of the effects of this alternative

Your questions are based on the premise that a large burn such as the one you describe will occur. We conclude that larger fires are possible under this or any of the alternatives. Analysis of the type you advocate would be based on speculation and would not be germane to a reasonable comparison of the alternatives.

- 21.179** In response to the biodiversity topic, [the description of Alternative B] states a program of ecosystem restoration will be started. This is not defined and it is not certain whether the cost of such a program are considered.

The program will be used where habitat conditions are significantly outside the range of natural variability. The conditions that would place a habitat outside this range are not certain either. This concept is interpreted in many different manners [in] land management planning.

The coarse- and fine-filter approaches mentioned here too are expected to be used in all alternatives under the ecosystem management philosophy, so it is a question why they are stated here and not with the other alternatives.

The cost of the program of ecosystem (actually watershed) restoration is estimated and included in each of the alternatives. The coarse- and fine-filter approach is part of the biological basis for the formulation of all alternatives.

- 21.180** The statement [under Alt. B] that timber management will be within the range of natural variability [RNV] is not consistent with the statement under biodiversity mentioned in the previous paragraph, that talks about the new program for habitat conditions that are outside the RNV. What management activities will cause habitat conditions to be outside this range is not stated or understood.

There are no parallel statements for the other alternatives, so it is implied that this is the only alternative that will cause habitats to move outside RNV. Why management under this theme would cause this is not portrayed.

The statement you reference implies (clearly) that harvest levels projected in the future under this alternative are expected to be within the RNV. Watershed restoration is programmed in the same areas of the Forest in all alternatives, due to the effects of past management activities. Watersheds of concern are identified in the Water section of

Chapter III The rationale for identifying these watersheds is fully explained in the same section

- 21.181** Recreation management [in Alt. B] is.. to emphasize "developing new facilities where demand exists." The location of these facilities, their costs, and their capability to meet the demand are not stated. A demand analysis for these facilities is not presented. It is difficult for the public to determine what this means in this alternative, because it has not been quantified in any manner.

Recreation management in Alternative B is framed around the development of new facilities where demand exists. It could more accurately be stated that facilities will be developed if there is sufficient demand. The location, cost, and capability of these types of facilities are not quantified because demand does not, at present, exist.

- 21.182** The second paragraph on DEIS page 3-147 lists the acres and MCCF of sawtimber harvest for the alternatives. There is no listing for Alternative B. This is inconsistent with the listing in the DEIS Summary, page 21.

The first sentence of the paragraph you mention states the MCCF sawtimber volume and acreage for Alternative B.

- 21.183** Alternative D The Theme for this alternative states it is an even blend of multiple-use resources and principles of ecosystem management. When reviewing the Objectives Shared by All Alternatives, it would seem that if the alternatives are meeting Objective 2 (Provide for multiple uses and sustainability in an environmentally acceptable manner) and Objective 3 (Provide for a variety of life through management of ecosystems), which they are all said to meet, then there would be a reasonable blend of multiple uses and ecosystem management. The phrase "even blend" indicates there will be the same level of management for each resource, which is certainly not reflected in Table S-1.

The Theme further defines this alternative as using a specific set of Management-Area Prescriptions to do certain "things." These are the same Prescriptions used in the other alternatives. It is not clear why the Prescriptions accomplish these "things" in this alternative and not in others.

One of these "things" is to protect biological diversity, which is said to change over time and space. It is stated that there is no widespread agreement on how to measure biodiversity or to perpetuate it. It is not clear how this alternative protects biodiversity better (or worse) than the other alternatives, especially given they are all legal and implementable, and share a set of Standards and Guidelines that ensure biological diversity (DEIS 2-2).

Your first concern is a question of semantics. All alternatives blend human demands with resource protection. In our opinion alternative D is a more even blend of the two.

The Prescriptions are arrayed differently in each alternative. Hence the term "alternative."

Finally, as you point out, the Standards and Guidelines ensure the protection of biological diversity in all alternatives. You have answered your own question.

- 21.184** The Theme for Alternative E is almost identical to Alternative D except that it specifically states the even distribution of multiple-resource uses will be in areas of past development. It is not clear what "areas of past development" are. Does this mean throughout the present and presettlement times? Or does it mean areas that have been harvested under FS management? Or does it mean development in the sense that building houses causes development? There could be many

interpretations of this wording. The intent should be stated so the meaning is clear to all. The documents state that 7.7% of the Forest has been unaffected by human impact.

Based on the lack of comment on this point, it seems that the intent of the alternative is stated clearly enough to be understood by the majority of the public. The alternative very clearly and succinctly states that timber harvest is limited to areas of past development (where road construction and timber harvest have occurred). The document states that 7.7% of the Forest has been subjected to timber harvest activities in the past.

- 21.185** Alternative E's differences from D need to be very clear because it would appear moving from preference to D to E would appear to be a good-faith effort for the FS to "compromise" with some environmental groups in the final decision. The economic analysis may show that E is more efficient.

There is no basis for your conclusion. Alternative B could be seen as a good-faith effort for the FS to "compromise" with timber industry. No such compromises have occurred.

- 21.186** Alternative D's Timber Management and Suitability description is identical to E except that D includes, "Management would be designed to simulate natural disturbances to the landscape." Does this mean that E will not have this as part of the timber management?

The acreage differences between D and E for timber harvest show 135,000 fewer acres for E in 5.13 Forest Products and 50,000 more acres for E in 5.11 General Forest and Rangelands. The guidelines for 5.11 and 5.13 both include "Use landscape spatial analysis in ecosystems where it is appropriate..."

It is not clear why this difference in the descriptions of Alternatives D and E was stated and it is therefore very difficult for the public to determine the differences between these two alternatives.

Much of the area programmed for harvest in Alternative E has been managed in the past. While principles of Scenic Resource Management would apply and efforts would be made to simulate natural appearances, in many cases this would be a difficult objective to achieve. Therefore the statement was left out.

The array of Prescriptions is different in Alternatives D and E. That would account for the differences in the acreage totals you cite. The spatial-analysis guideline applies to all alternatives. We believe that this is very clearly stated.

- 21.187** Alternative F The implication is clear that this alternative is not the FS's. This should be left out of the display when comparing the alternatives. It doesn't matter who came up with the idea.

We completely disagree. It's no secret who came up with the alternative, or why. We believe it addresses a legitimate concern and fills a valid niche in the range of alternatives. As of April 1994, the alternative is an FS alternative. It was analyzed equally with the other alternatives, and the comparisons are valid.

- 21.188** The background information given for Alternative F includes that timber management is included in the alternative but only on a small scale and only in areas (and they are listed). Without very careful reading of these documents it would seem that other alternatives allow harvest in other areas.

The fact is, the Standards and Guidelines are common to all alternatives presented and timber management is only allowed in the areas listed in this part for Alternative

**F or on other Management Areas that F allocates no acres to. This is a misleading implication that management is quite different in these areas for this alternative when it would be the same.**

Timber harvest prescriptions may be similar to, or the same as, other alternatives, but you are correct that harvest is allowed on a much smaller area in alternative F than in the other alternatives

- 21.189 The theme for Alternative F states the natural disturbance regime is expected to reestablish itself where feasible. The meaning of this is not clear. How is this different than other alternatives?**

Basically, natural disturbance processes (fire, insects, disease, etc.) would be allowed over larger areas at a greater scale in Alt. F than might be expected in the other alternatives

- 21.190 The requirement that humans are allowed as long as they are compatible with protecting biological diversity is not definitive. Without an accepted tool to measure biological diversity, it cannot be said whether humans are compatible with protecting biological diversity.**

All alternatives ensure biological diversity, so there is no need to further restrict this alternative to protect biological diversity even more. Biological diversity is like energy--it is neither created nor destroyed--it's just changed. Whether the change is good or bad depends on objectives.

The intent of the alternative is to minimize human disturbance and/or influences

- 21.191 The statement that "availability of and accessibility to other forest products is expected to be limited" appears to say that the FS does not know for certain whether this availability and accessibility will be limited or not. If the alternative is not developed enough to know this, then the alternative is not clear enough to implement or compare with others.**

The same wording is used in other alternatives, yet this point is raised only for this alternative. Since all alternatives are formulated on expectations that are projected into the future, we feel the wording is appropriate

- 21.191 The objective of the "FS Paying for Itself" is meritorious and is stated to be the purpose for Alternative C. The FS DEIS states this alternative "was dropped from detailed consideration because it could not be legally proposed, considered, or implemented" (pg. 11). It is not clear what law imposes this restriction**

We do not have the authority to implement some policies that would allow the Forest to break even. For instance, part of the strategy might be to raise grazing fees. Only Congress has the authority to raise grazing fees on public lands

- 21.192 The Glossary of these planning documents consistently includes humans in its definitions of phrases with "ecological" in them. Ecosystems do include humans and human activities. The Chief's definition of ecosystem management includes humans, as well.**

**When looking at how this Forest is to be managed under this Plan it is obvious "ecological" does not include humans.**

Our definition of ecosystem management includes humans. All alternatives have some degree of management (human influence). All alternatives likewise feature resource protection where management occurs.

**21.193 National Goals** It is commendable that the RGNF planning documents include as Appendix A the National Goals Relevant to Land and Resource Management. In those goals an "even flow" of timber is called for. In the National Forest Management Act a non-declining flow of timber is required unless declared a departure alternative.

In revising this Plan the RGNF is stating it will provide a declining flow of timber. All the Alternatives considered reflect a drop in volume from current levels. This is contrary to the national goals and law.

There is no statement to the effect that we "will provide a declining flow of timber " This is your statement, based on your conclusion. An even flow of timber is provided in all alternatives, with the possible exception of Alternative A. The National Goals and requirements of the law have been met just not at the level you would like to see.

**21.194 Another National Goal not met in this Plan that could be with proper management is the coordinating of the timber sales program with planning, management, and use of other Forest resources.** Timber sales in this Plan are allowed only when all other resources are taken care of. Even in Category 6 Management Areas, where the objective is grassland production, timber harvest is not allowed.

The law has always required other-resource protection before timber harvest is allowed. In Category Six areas on the RGNF, there is generally grass and few if any trees hence no timber harvest expectation.

**21.195 The Plan does not attempt to meet the goal to provide a continuous flow of raw material to local forest industries.** The preferred alternative of this draft revision of the Plan is a significant decline of raw material.

The Plan in all alternatives seriously attempts to provide a continuous flow of raw material to all local mills. You are correct that the preferred alternative has a lower ASQ than the current Plan. The rationale is contained in the planning documents.

**21.196 The national goal to improve the quality and yield of new timber stands should certainly include noncommercial and commercial silvicultural practices.** This goal does not limit the improvement to stands on suitable lands, but rather implies a broad application of improving all new and existing timber stands.

The goal to maintain or increase the growth rate, health, species composition, and/or improve the quality of stands for timber or other resource uses should be directed from within this Forest Plan. Consideration for long-term Forest health is conspicuously absent in this plan.

We disagree. The Plan is based on the long-term health and productivity of the Forest. The laws applicable to management of National Forest lands do not stipulate the management of Forests as tree farms.

**21.197 This Plan is founded in the "Need for Change" concept as documented at the beginning of the DEIS (pg. 1-1).** While it is recognized this concept is based on the Regional Guide, it is not proper to produce a management plan for a National Forest on this concept. The resources are so interconnected that only reviewing those items identified as needing change results in an inaccurate portrayal of the situation. The Plan should not be based on this concept.

The RGNF found that revising the Plan with the "Need for Change" concept, that is changing parts of the existing Plan while leaving those not in "Need for Change"

alone, did not work as evidenced on the second and third pages of the DEIS. This policy at the Regional level should be dropped because it does not work

**Resource management on National Forests must be integrated and revising one portion of a Plan will almost always affect most portions of the Plan. The correct course of the analysis in a Revision should be (in part) to focus on the effects of changes in the existing Plan to all resources rather than to look a change in an isolated manner.**

We are inclined to agree, since we did find that most if not all of the existing Plan needed revision. We are not inclined to agree that the situation would be the same on all National Forests, or that the "Need for Change" concept should be dropped. Your comment should be made to the Regional Office rather than individual Forests.

- 21.198 The DEIS, page 1-2, says there has been a dramatic shift in the public's perception of Forest management, the amount and type of timber harvest. It is further stated that there is concern over human needs and that those concerns are of equal importance.**

**The concern that too much is being harvested is that of a vocal minority. The real concern is that of American citizens who use wood products every day in their lives and of those Americans who depend on the wood products industry for jobs. The public is concerned about the declining health of our Western forests because of their aging, unmanaged conditions.**

**The concerns of this vast majority of citizens is ignored in this Plan as the harvest is significantly below the potential of this forest for long term sustained yield. The focus of this Plan is to bring it closer to the "reference" landscape which is free from evidence of human intervention.**

We do not agree that the concern about too much harvesting is "that of a vocal minority." Our records indicate that the opinion is shared by a broad cross-section of the public (local, regional, and national) and is a very legitimate concern.

We are equally concerned about people who desire wood products and the people who are employed by the timber industry. We are using the reference landscapes as part of the rationale for making vegetation management decisions. Vegetation management is not free of human influence.

- 21.199 The DEIS says that since the 1985 Plan, "Finally, the Forest Service's management philosophy has changed to one of managing multiple uses within the context of a broad assessment of all resource, social, and economic values known as ecosystem management" (DEIS pg. 1-5). Multiple-use management is the legal mandate of the USFS and has been since its inception.**

We agree. We are merely incorporating the principles of ecosystem management into the framework of the multiple-use concept.

- 21.200 Several places in the planning documents refer to the laws that govern management of a particular topic. One example is page 3-113 of the DEIS. Here the Endangered Species Act (ESA) and National Forest Management Act (NFMA) are identified. The document appears somewhat biased in its presentation in that only the requirements of the ESA are identified specifically. The requirements of the NFMA are not stated. The treatment must be consistent.**

The omission is an inadvertent oversight and has been corrected in the FEIS.

**21.201 Throughout the DEIS there are displays of the numbers of acres affected by certain management activities. There is not the balance of showing the positive outcomes of those management activities such as the number of jobs that would be produced, or the number of T-bone steaks that would be produced, or the number of houses that could be built.**

**The results of management are not defined in terms that are realistic and meaningful to the general public but are only stated in ecosystem management terms. While this presentation is needed, the other is as well. In the Environmental Effects the consequences of management on people must be displayed**

The Social, Financial, and Economic Element discussion in Chapter III of the FEIS speaks directly to jobs created or lost due to the RGNF's contributions to the local economy We are responsible to display outputs such as board feet of timber produced and the number of cattle grazed. We are not responsible for, nor required to display, what products might be produced from those resources that come from the National Forest

**21.202 If the timber industry "packs up" and leaves the RGNF, who will do the management that is required under the ecosystem management philosophy? What will the cost be?**

**Bias against timber sales is shown in the wording on DEIS pg 25 when comparing the minerals activities would disturb less than that from a single timber sale. It would be more appropriate to state how many acres would be disturbed rather compare the activity to a timber sale.**

**The implication is that timber sales cause a great deal of disturbance. Whatever disturbance occurs can be and will be mitigated (as it will be for minerals removal) and will be within the limits of the laws and regulations. Why does it appear that all disturbance is bad in this Plan?**

We are aware of only one timber manufacturer in the San Luis Valley that might even be considering "packing up and leaving " if this manufacturer is what you would characterize as "the timber industry," then we do not feel that you are fairly representing all timber interests

The comparison you cite was made because many people can relate to the size of a timber sale No bias was implied or intended Disturbance to one degree or another is included in all alternatives Mitigation is assumed in our calculation of effects We do not consider disturbance bad, only necessary

**21.203 Defining what size of ecosystem to analyze is complex The entire earth or universe could be called an ecosystem. So could what's happening under someone's fingernail.**

**a comparison of presenting data at two levels is displayed in the section Discussion of the Alternatives as a Set. The RGNF has attempted to consider the ecosystem at several levels. As the world continues to demand wood products is it not more environmentally rational to harvest here, on this Forest, under the T&E Species Act, The Clean Air and Water Acts, NFMA, and MUSY than to allow harvest practices to occur as in countries where environmental safeguards do not exist?**

**Which scenario will result in the net gain or loss to the world ecosystem or the world's soil productivity? The avoidance costs of not harvesting here must be considered.**

We are well aware of the complexities of ecosystems large and small! Your implication is that we are not harvesting timber on the RGNF. The opposite is true. We feel that we are setting the example for other countries to follow in responsible resource management.

- 21.204** By delineating each acre with a set Management Area label, the FS is excluding other activities that could occur on those acres in harmony with the activity the Management Area espouses. For example, dispersed recreation is an appropriate activity on acres under timber management (5.11). Acres with active timber sales should be closed to recreational use for safety, but that is only a very small part of the acres set aside for timber production. By defining acres in the Management Area philosophy a distorted view of Forest use is given.

The point of your comment is not clear. Dispersed recreation can and does occur on lands where timber management is emphasized (it is not the exclusive use, though). Conversely, timber management is allowed on lands that emphasize dispersed recreation.

- 21.205** The idea of biological diversity is presented in a backwards manner throughout this planning presentation. By managing millions of acres under the focus of old-growth management the diversity offered by a variety of structural stages is compromised. The use of management to maintain healthy, growing forests and increase diversity has not been considered.

The RGNF is making old-growth management synonymous with increasing diversity. This is not necessarily true. This planning effort gives the idea that management activity and human influence is going to be detrimental to biological diversity. That is not according to fact.

The presentation of biological diversity is based on accepted scientific literature. Old growth is an important component of biological diversity and is spoken to in that context, and is never presented as the focus of management anywhere in the Plan. Management activities and human influence are featured in all Forest Plan alternatives.

- 21.206** In the discussion of biological diversity, in comparing the alternatives (DEIS pg. 2-17) it is stated that the conclusion "a larger portion of the Forest will remain in an undeveloped state" supports the premise that "Net productive capacity of the land does not decrease." There is simply a lack of understanding of basic land management principles demonstrated here.

Developing land does not have to cause and should not cause the productive capacity of the land to decrease. This misunderstanding is a cornerstone to this entire Forest Plan effort and should be of utmost concern to the public and to the Regional Forester making the decision for the final Plan.

This is simply a statement of fact. We do not put forth the premise that non-development is better. Rather, we simply state the fact "Net productive capacity of the land does not decrease."

- 21.207** The statement that the set of Standards and Guidelines presented is designed to directly or indirectly ensure that the net productivity of the land is not impaired does not mean that the S&Gs will ensure net productivity is not impaired. In the event of a large, catastrophic fire, which the Draft Plan documents say is likely, the vast averages of old growth could burn so hot as to sterilize the soil.

Perhaps that is within the range of natural variability and no one is worried about it. The productivity of the soil in such a case would decline within the planning horizon. The costs to keep the soils in place on slopes would be very high. Mitigation

**procedures for soil retention may not be legal in Wilderness Areas. None of these consequences of the S&Gs are considered in this analysis.**

The Standards and Guidelines are, in fact, designed to ensure that the net productivity of the land is not impaired. They are not presented as an absolute guarantee, but as a *safeguard*. They will also be monitored for effectiveness and changed if necessary.

The fire scenario you present is possible in any alternative, and is speculative rather than absolute. Consequences are presented for activities that are predictable, based on management emphasis.

- 21.208 Inventory Data** The RMRIS data received only contained some of the RMRIS fields and about one-fourth of the acres on the Forest. The FS needs to realize that a good inventory is imperative to building a Plan with the analytical tools of today. A commitment to complete the inventory of the RGNF must be made, funded, and completed. This inventory is for all resource areas.

We are aware of the value of a good inventory, and would argue that the RMRIS database is far more complete than what you describe.

- 21.209 Table S-2 (DEIS, page S-1) Activities, Outcomes, and Effects.** This table is confusing as it lists a 10-year desired-condition level and a Decade 1 total for some activities. For some activities the two listings are equal, and for others it is different. No explanation is given with the table for this discrepancy.

There is no discrepancy. No explanation was offered because we felt the table was self-explanatory. The 10-year desired condition is just that. The Decade 1 total is a projected level that is expected within the framework of the alternative it is listed for.

- 21.210 One of the six reasons for revising the Forest Plan was to resolve conflicts between timber outputs versus Standards and Guidelines.** The lack of quantitative direction for Standards and Guidelines coupled with the overriding emphasis to bring ecosystems toward the reference (not influenced by human activity) landscape will certainly prevent timber harvest in implementing this plan. This will result in constant conflict between the timber harvest and standards and guidelines.

The DEIS opens with the Bob Dylan quote, "I'll let you be in my dream if I can be in your dream." Management of the nation's federal lands is not a dream or a song. The products required by our society are real and should not be trivialized by comparing this process to a dream.

The Standards and Guidelines presented in the documents are those not covered in laws and regulations. This is explained in the DEIS and Draft Forest Plan. There is no attempt to prevent timber harvest in any of the alternatives, as should be apparent by the outputs predicted for all alternatives except a

Dreams are part of everyday life and one of the fundamental building blocks for the future. Management of federal lands is not trivialized by the quote from Mr. Dylan. The attempt was to humanize the document. Martin Luther King had a dream that affected the lives of millions of people. We would ask you if that dream would be considered a trivialization.

- 21.211 Table S-1 lists 3,046 acres in Management Prescription 3.56, Aspen-Limited Management, for Alternative F.** There are no Standards and Guidelines given for this Prescription so it is not possible to compare the effects of this management in this Prescription to the other alternatives.

The oversight has been corrected

- 21.212 Access and Roads** The Draft Plan Standard for Infrastructure - Travelways says (in part), "On lands outside of designated travelways, motorized use with wheeled vehicles is restricted unless the Forest Visitor Map or a Forest Order indicates that such use is specifically allowed." Does this mean a change in the Forest Visitor Map is a change in the Plan and therefore an amendment? The Forest Visitor Map should be appended to this document if it is to be the actual commitment of this Standard.

No, a change in the Forest visitor map would not constitute an amendment to the Plan. The statement is merely one of policy. Travel with motorized vehicles is restricted to roads and trails unless the map or a Forest order cites an exception. This is not a Forest Plan decision and would not require an amendment.

- 21.213** The current Forest Plan for the RGNF was approved on January 4, 1985. The 11 amendments and Judge Finesilver's ruling are now part of the requirements for carrying on the current Plan. This Draft has not been approved and must not be implemented before it is approved.

The DEIS (pp 1-6) reveals the RGNF has already begun to implement the new Plan because of the "desire to emulate the scale, size, and distribution of disturbances that occur naturally in forest landscapes". This is not part of the current Plan, and where it causes deviations from the current Plan it must stop at once.

The 1985 Plan is still in effect, and will be until the Revised Plan is formally approved and adopted. The sentence you cite speaks to the change in public perception of timber harvest (it is generally viewed as bad) and changes in silvicultural techniques in response to this perception.

Perhaps it can be stated more clearly. The 1985 Plan was modeled using even-aged silvicultural prescriptions, primarily. There is no legal requirement that these be the only prescriptions employed. Conversely, the Draft Revised Plan was modeled using primarily uneven-aged silvicultural prescriptions, however, we have reserved the use of the entire array of silvicultural prescriptions (including even-aged ones).

- 21.214** The Draft Plan document does not commit the RGNF to anything specific. Timber harvest for the duration of the Plan is contingent on old-growth surveys and landscape patterns and data to be collected at the project level. Certainly project-level analysis is always required, but this Plan is to set a course for the next ten to fifteen years.

Instead of clear direction as to what will happen on this forest, this Plan basically says the Forest will do some studies and then decide what it's going to do. That is not consistent with the requirements to produce a ten-year management plan.

The instrument of implementation is the Final Plan document. If this Draft Plan were identical to the Final the implementation could not occur. Considerable amounts of information required to implement the Plan are not in the document. One example is the listing of acres in Management Areas. A review of what is needed to be in the document for implementation is suggested so that implementation (and monitoring and evaluation) can proceed smoothly when a Final is approved.

Each alternative describes a course of action for the Forest over the next ten to fifteen years. The outputs for each alternative are displayed in the FEIS, as well as the consequences of producing them. We do not support your conclusion.

**21.215 The document is infused with biocentric theories and quasi-religious sentiments that purport to be for environmental protection. The theories are so untested and radical that the result is social engineering.**

The document is based on accepted scientific research as well as accepted principles of social science. The document contains no religious statements (quasi or otherwise)

**21.216 Please add the following objective to Series 8 which covers rural development**

**"The RGNF provides valuable products to the American people. The RGNF Plan pursues policies that perpetuate the efficient rural economic infrastructure that has provided these goods and services. This infrastructure has supported the additional benefits of clean air, water, wildlife, and open space."**

We believe that your concern is adequately addressed in the existing Objectives statements

**21.217 Management Prescriptions 1.41, 1.42, 3.21, 3.22, and 3.55 embody the most extreme misanthropic management scenario I've ever seen in a draft Forest Plan. It is a plan to re-wild the RGNF and relegate humans to small islands of activity. It achieves a result of social engineering through the devious means of focusing on the "environment" through excluding humans**

Since the embodiment of these "theories" ventures so far from the mandates of the National Forest Management Act and the Sustained Yield Multiple Use Act, it is likely that Alt. F has illegal elements. It should have been dropped from further consideration (like Alt. C) for this reason.

The Management Prescriptions you mention were developed specifically for Alternative F. The alternative was designed to allow the analysis of the island-biogeography theory of forest management, and to allow comparison of the results to other alternatives.

The island-biogeography theory is valid and is being used in other parts of the country. The question is whether the theory is applicable in the southern Rockies.

We believe Alternative F fills a valid niche within the range of alternatives. CEC and a group of local people put the alternative together and asked that we include it. One of the criteria for accepting the alternative was that it be legally implementable. As of April 1994 the alternative became an FS alternative. The agency is responsible for its content and analysis. The alternative is legally implementable, that is not likely, however, since it is not the alternative selected.

**21.218 Many prescriptions addressing Wilderness and Recreation evaluate the degree of "solitude and spirituality" likely to be found within a particular prescription. Equating spirituality with solitude is a value judgement the RGNF has no business making.**

With this phrase, RGNF flirts with government-established religion, banned in the First Amendment.

Spirituality can be found outdoors, though not only in the ways permitted by the Prescriptions. I, for example, find an outdoor spiritual experience in getting first tracks in the powder snow with my snowmobile. A lumberjack may find felling a tree to be very spiritual.

Spirituality is either very personal, and a matter of individual liberty, or else found within the bounds of established religions (RGNF does not want to do this I hope).

**The FS, a federal agency, cannot legally or morally discuss spirituality within the parameters of a Forest Plan.**

We have equated the opportunity for solitude with the opportunity for "spiritual renewal," as opposed to spirituality. Renewal of the human spirit through recreation activities is something that social scientists have identified.

The phrase "spiritual renewal" was coined by members of the public, and has been the subject of considerable comment. We contend that spiritual renewal can occur as the result of virtually any recreation activity, whether motorized or non-motorized. There has been no attempt, real or implied, to insert religious values in the Forest Plan.

**21.219 The DEIS summary states, "Regardless of alternative chosen, none of the potential corridors will become insurmountable barriers to wildlife movement" (pg. 16). Table S-9 is labeled "Unroaded Areas/Core Areas."**

**I interpret this to mean that the theory of island biogeography has been surreptitiously inserted into all alternatives. Because of its radical nature, this theory should be confined to Alt. F, or not applied at all. When constrained in this way, the alternatives are unable to demonstrate sufficient range.**

The RGNF subscribes to the theory of "species dispersal," as opposed to "island biogeography." The statement you quote is one of fact, and is a summary conclusion to the previous paragraphs addressing the subject of fragmentation. You need to read the entire section so that the sentence is in the proper context.

Table S-9 is labeled "Unroaded/Core Areas" because the table summarizes unroaded acres in all alternatives. In alternatives A-E they are unroaded areas, in Alternative F they are Core Areas, hence the title.

**21.220 The constraints (designated trails, combining roads & trails to calculate density) placed on motorized recreation by the restrictive Prescriptions are common to all alternatives. These constraints prevent the demonstration of a true range of alternatives. For example, the Colorado Assn... of 4 Wheel Drive Clubs reports that at least 480 miles of roads will be closed in all alternatives.**

**An alternative should be developed that would demonstrate the benefits of motorized recreation if trails and Forest access were increased from the present. Certainly, recreation demand shows this is not an unreasonable request.**

There were 486 miles of road identified for potential closure in all alternatives except F, which had considerably more. The Forest has about 2,200 miles of road and roughly 1,500 miles of trail. The majority of the public expressed concern that we should not expand the road system until we can take care of what we have, and that we should look at closure of some roads. This was translated into the alternatives.

**21.221 In particular, Don Riggle has invaluable expertise on how OHV opportunity should be provided on the ground. His specific comments should be incorporated into the Final EIS and Plan. The Colorado 4 Wheel Drive Assn... also has provided you with valuable input on specific roads, which we urge you to implement.**

All comments received during the public-review-and-comment period have been read and responded to. Responses to comments made by the individuals or organizations you cite are included in the FEIS.

**21.222 We do not have available a copy of what we said on the video that you made, but we would appreciate it if all of what we said before the camera that day could be**

**entered as our concerns about the Plan We hope you still have what was cut that was taken of us (for the video that was distributed) and that it can be used by your staff. We spent many hours composing what was said that day!**

All of the background video has been retained as part of the Planning Record Unfortunately, all of the video material could not be used in the Forest Plan Video we distributed--it would have been of epic proportions Your comments have been noted

- 21.224 Leave the tree farm and thinned stand isolated true old growth and their surrounding wanna-be old growth alone--period. Forever.**

a significant portion of the Forest is allocated to the Backcountry Prescription in the Final alternative. Combined with Wilderness, that would constitute approximately 62% of the Forest. We believe that this addresses your concern.

- 21.225 The current Forest Management Plan allows 143,077 Animal Unit Months (AUMs) of grazing by livestock and wildlife, and the Summary Draft EIS states that "Approximately 84,446 acres (or 32%) of the Forest's suitable rangelands are in unacceptable condition" (p.22). Yet Alternative D presents no change in current grazing practices, as it recommends 143,077 AUMs, as well. It appears that Alternative D does not address the unacceptable conditions of the Forest's rangelands.**

The AUMs in Alternative D do not change from the current Plan Grazing practices do Range allotment plans determine grazing strategies for various areas of the Forest Where range is in an unacceptable condition, allotment plans would be modified so that the condition can be changed to acceptable over time

- 21.226 The DEIS is very confusing to read and understand at times. There is much wordiness and repetition of whole paragraphs throughout the DEIS, and I wonder if it could somehow be simplified.**

Our intent is to present the information in the simplest terms possible Admittedly, we struggle with this Every effort will be made to simplify the FEIS further

- 21.227 I find the map on page 3-41 extremely difficult to read--perhaps you could enlarge it to a full page.**

We will attempt to clarify graphics that are difficult to read

- 21.228 On page 3-44 the term "sapling-pole" is used twice in the definitions The second of these should be just "pole" or whatever.**

The definitions are correct, they describe Sapling Pole stands with a different canopy closure The first definition is for Structural Class 2 and the second is for Structural Class 3

- 21.229 The terms "million board feet" (MMBF) and "cunits" are continually intermixed, and this is extremely confusing What is a cunit, anyway--some kind of a tropical fruit? Seriously, I believe you should use the concept of MMBF in all text and tables.**

This is a very common complaint a cunit is a cubic-foot measure that we are required to report The FEIS will have tables that display board feet for all timber outputs

- 21.230 I have concerns about different landownership involved in managing ecosystems "at the regional, landscape, or watershed scale." This needs to be clarified.**

The FS has jurisdiction over National Forest System lands only. We have no authority to make decisions on private land unless the right is negotiated and paid for. We do take into account activities on private lands that may have an effect on National Forest land management decisions.

- 21.231 I have concerns about "Meets the needs of Forest Staff." I believe that phrase should be removed. There should be no net gain in Forest System lands. Counties are already having tax revenue problems because of large amounts of federal land not on the tax rolls.**

The idea is that land would be exchanged where it would be in the best interest of the public, and facilitate Forest management. No net gain is intended.

- 21.232 I do not feel that the proposed Plan meets this objective because of the language about "when permits become vacant they will be canceled," as found in the Wilderness Prescriptions. This is not giving the true picture of economic activity.**

The cancellation of vacant permits would not be done without adequate public notice.

- 21.233 We would like to see conservation organizations specified in Forestwide Objective 7.9, along with federal and state agencies and private landowners.**

Your concern has been noted and is being considered.

- 21.234 Alternative F would provide the maximum protection for non-human biodiversity. This is the only alternative presented which attempts to account directly for the requirements of wide-ranging species such as lynx and wolverine.**

However, it has not been shown that sustainable levels of resource production cannot coexist within carefully selected habitats. We believe that, with rigorous attention to detail, the Forest can emulate the genuine needs identified in Alternative F through specific project management, long-term monitoring, inventory, and a flexible management system.

We do not agree with your conclusions regarding Alternative F. We believe that all of the alternatives in the range address the concerns you cite. We believe that the selected alternative (G) addresses your concerns and meets the needs you identify.

- 21.235 Increased plants listed include iris, potentilla, cinquefoil, dandelion, rabbitbrush, fringed sage, ring muhly, redtop, yarrow, etc. They occur in great abundance on most allotments we've seen on the RGNF, particularly in the Saguache Park area.**

Clearly, there are many areas across the Forest which are in a similar degraded condition. If the Forest Ecologist also believes that much of the nonforested acreage is in mid-seral ecological condition or below, why has there been no real analysis of grazing suitability for Forest rangelands?

Updated range-suitability criteria have been applied. The results are displayed in the FEIS.

- 21.236 There is minimal information about Sensitive fish, or fisheries quality. Was this section omitted from the Draft? We hope to see a comprehensive Fisheries section in the Final Plan, incorporating full discussion of fisheries quality.**

Concerns about fisheries habitat or populations have never surfaced as an issue. For this reason, the discussion was folded into the discussion of water quality. We felt that addressing water quality adequately took care of fish concerns.

Concerns such as yours have been expressed, however, in comments on the Draft EIS. Accordingly, the Fisheries section has been expanded and included in the Riparian discussion in the Final Plan.

- 21.237 Alternative D proposes to open all currently Non-Motorized areas (except Wilderness Areas) to winter snowmobile travel. We feel this is a bad idea from several perspectives. In winter, animals are already low on fat reserves. The high-pitched drone of snowmobile engines, even if only periodic, can harass wildlife and cause undue stress.**

The areas you speak of are currently Motorized in the 1985 Plan. We are in the process of reviewing research that demonstrates that snowmobiles are detrimental to animals, plants, etc. If there is sufficient cause, restrictions will be applied.

- 21.238 The economic arguments presented in the DEIS lack depth of analysis (Summary, pg. 36). A more equitable analysis would have included biodiversity values such as the economic value of living trees, healthy riparian areas, functioning forest ecosystems, abundant wildlife, and uses foregone.**

The table on page 36 of the DEIS Summary is a summarization of the full-blown economic analysis included in the EIS. Many of the things you cite would be difficult to place a dollar value on. The economic analysis meets the regulatory requirements for a Forest Plan.

- 21.239 The total proposed Research Natural Area acreage equals just over 2% of the Forest (42,782 acres). Three-quarters of this is in existing Wilderness Areas, and is thus already protected. Only 10,695 acres out of 1.9 million will be newly protected by these RNAs.**

The intent of the RNA program is to establish a system of RNAs on the Forest, not to protect these areas from potential development. The RNAs were identified based on specific criteria and are located where they are. Some are in Wilderness, some are not. Regardless, they met the criteria for selection.

- 21.240 The public must have an opportunity to comment before any expansion of the Wolf Creek Ski Area is approved.**

The Final Forest Plan map includes the potential expansion area at Wolf Creek. Before any expansion is approved, an Environmental Impact Statement will be required. This will include the opportunity for public review and comment.

- 21.241 The Coordination Agreement with the Colorado Division of Wildlife. How will this coordination agreement, signed June 20, 1990, be incorporated into the Forest Plan?**

The agreement will be honored under the Revised Forest Plan.

- 21.242 Annual Evaluation Report. We agree this is a good idea but we wonder how land suitability can be evaluated annually. However, the Plan should give the reader some idea on what amount of change in suitable land would trigger a Plan amendment or revision.**

Land suitability will be addressed as part of project-level analysis. Generally, a change in criteria that would affect a sizeable amount of acreage, which in turn would affect the ASQ, would require an amendment.

- 21.243 What is meant by "evaluate whether there needs to be any Congressional recommendations"?**

These are land management decisions that would require Congressional approval, such as additions to the Wilderness System or recommendations for Wild and Scenic River designation

- 21.244 Research Needs** Top priorities should be, in descending order old-growth inventory based on Mehl, range-condition baseline data, riparian classification and mapping, and accurate road inventory.

The Forest is committed to obtaining data for these and other categories.

- 21.245 Tactical Monitoring Plan** This section of DRFP Chapter V contains the details of monitoring and how to do it. However, "the tactical plan could change without amending the Forest Plan" (pg. V-2). This makes it vulnerable to adverse change with no opportunity for the public to comment. This is not acceptable, as it is vague enough as it is.

The Monitoring Plan has been revised to be more specific, based on the comments received. The Plan is subject to change without amendment to the Plan, to facilitate updated monitoring techniques, current data, research, etc. The Forest is committed to the *Monitoring Plan*.

- 21.246 Funding For Monitoring** CEC appreciates the commitment expressed at Plan pg. V-3 to "set aside part of (the RGNF's) annual budget to assure that the Monitoring Schedule is accomplished." Traditionally, monitoring is the very last activity to get funded. How will the RGNF change this situation, given that budgets are determined by Congress and are shrinking? The Final Plan and EIS must address this issue.

The Forest recognizes the importance of monitoring, hence our commitment to do it. *Funding for monitoring will be a Forest-level decision. The intent is to continue to set aside a portion of the annual budget to accomplish the task.*

The FPIDT has identified the minimum legal requirement for monitoring and, at the next level, important things to monitor that are not legally required. Monitoring needs vary by year, as do budgets. What specifically gets monitored, and how, will be a function of annual work plans and the budgets we are given by Congress.

- 21.247 When NEPA applies** The USFS is incorrect in asserting that all amendments to grazing permits and adoption of all implementation schedules are exempt from NEPA procedures.

We agree, for the most part. Amendments to or changes in grazing permits or implementation schedules that would result in tangible changes in environmental affects would be subject to NEPA.

- 21.248 Since most standards and guidelines (S&Gs) in the draft LRMP allow for extensive resource degradation (regardless of the underlying "objectives" of those S&Gs) the EIS must analyze the impacts that could occur when the S&Gs are implemented.**

The environmental consequences displayed include the assumption that all Standards and Guidelines and attendant mitigation procedures are in place and are, therefore, accounted for.

- 21.249 Finally, the draft LRMP and DEIS fail to disclose what the existing S&Gs are, how the proposed S&Gs differ, and the reasons for the changes.**

*We disagree. Readers have some responsibility to pursue the information they (you) are interested in. The existing (1985) Forest Plan has the current S&Gs, the Final Forest Plan*

contains the new ones. We invite you to compare them. The rationale for changing the S&Gs was cited as one of the reasons for revising the Forest Plan.

- 21.250** The Regional Office refused to respond to those comments or to analyze the impacts of adopting new Management Prescriptions (MPs) in the Regional Guide EIS. The reason the RO gave was that citizens could comment on the MPs when each Revised Forest Plan was proposed and that impacts of adopting new MP's would be addressed in each Forest Plan EIS. The RGNF has not performed these duties.

We disagree. The FEIS is a full disclosure of all effects related to the implementation of all alternatives. The MPs you cite were used in the alternatives, so we would argue that your concern has been adequately addressed.

- 21.251** The reorganization of management functions and staff between the FS and the Bureau of Land Management should facilitate looking at the whole watershed of the Rio Grande River.

We recommend that the joint staff consider the recommendations made in the Citizens' Management Alternative submitted to the BLM for the Rio Grande River Corridor Management Plan. Many of the habitat and wildlife considerations in that plan will be affected by management practices on the Forest.

Your recommendation is outside the scope of the RGNF Forest Plan Revision.

- 21.253** a number of issues are not addressed in the proposed Plan. There is little or no information on fisheries and the impacts of implementing any of the alternatives. Since fisheries, among other things, are indicative of water and general riparian health, it is important to address them now.

In addition it seems that potential expansion of Wolf Creek Ski area, possible National Landmark and Special Interest Areas, and some revision of timber suitability incorporating the latest information, none of which are included in the draft, may be incorporated in the final Plan and/or EIS. It is therefore necessary to issue a supplement addressing these questions, since it would be unhelpful, as well as illegal, to include final items without the requisite public comment.

We do not agree that a supplemental EIS is required. All of the points you address were spoken to in the Draft EIS, which included the opportunity for public comment.

- 21.254** In their endorsement, both the Chief and the Director committed to using the Western Regional Corridor Study as a reference document when considering land-use decisions, including revising Forest Plans. This commitment by the Chief was emphasized during the January 13 meeting with the RGNF, yet not a single reference to this document has been found in the Revised Forest Plan. This is unacceptable, and the corridor study must be adopted in its entirety in the final forest plan.

The Western Regional Corridor Study was used as a reference document when the alternatives were formulated. None of the alternatives should be in major conflict with the document.

The document should have been listed as a reference. The oversight has been corrected in the FEIS. We do not agree that a reference document must be adopted in its entirety in the Final Forest Plan.

- 21.255** The Revised Forest Plan has failed to recognize the need for a Management-Area Prescription for utility corridors and electronic sites to be included in Chapter IV.

We found that the Prescriptions used in the selected alternative did not conflict with either existing or proposed utility corridors, and so opted not to use the Prescription you suggest. The Prescriptions we did use do not preclude reissuing permits for existing corridors or electronic sites.

- 21.256** In Appendix B, Key National and Regional Policies, on page B-12 under the section titled Special-Uses Management, policy number 1 states, "Do not approve any special-use applications that can be reasonably met on non-federal or other federal lands unless it is clearly in the public interest." This policy direction needs to be substantiated by reference to the applicable law.

Since it speaks to Regional Policy, this comment would be most appropriately addressed by the Regional Office.

- 21.257** The complexity and magnitude of the DEIS and associated documents make it impossible for those of us who have to work for a living and raise a family to adequately review and respond. I hope we will be able to amend mistakes at a later date.

The Plan can be amended as needed in the future.

- 21.258** The drastic changes proposed in Alternative D appear to be a one-sided proposal. Please do not implement this proposal as it is currently written.

The Selected Alternative is a combination of other alternatives, that was developed and selected based on public comments.

- 21.259** If the old fire pits are obliterated, then there would be less of a chance that people would build a fire. The FS could use volunteer help from the Colorado Mountain Club or the Sierra Club to do trail work and help eliminate fire rings.

FS workers routinely destroy fire rings when they are found in the Wilderness. We enter into volunteer agreements for trail work with numerous groups.

- 21.260** I found the section in Chapter 2, "Comparison of How the Alternatives Address Revision Topics" (pp. 2-17 to 2-24), confusing. In this section there was no supporting evidence for the conclusions.

This section of Chapter 2 referenced Chapter 3, but I have not yet found the supporting evidence clearly stated in Chapter 3. This section in Chapter 2 ought to be part of the conclusions in Chapter 3.

The comparison of alternatives in Chapter 2 is required by Forest planning regulations. Our intent was to simplify the comparison as much as possible. We appreciate your comment. More adequate information that supports the comparisons has been included in the FEIS.

## **22. Riparian**

- 22.1** How will riparian areas be adequately buffered and protected?

Riparian areas will be eliminated from the suitable timber base in the Final Plan. In addition, standards and guidelines limit management activities in and next to riparian areas so that riparian areas are fully protected.

The riparian and adjacent area are referred to as the Water Influence Zone (WIZ), which has a minimum horizontal width of 100 feet from the top of each bank. The WIZ is defined in the Watershed Conservation Practices Handbook and that language will be included in the FEIS. Direction requires site specific assessments to define extent of area needing special protection and what will be allowed within that area. Watershed Conservation Practices require vegetation and soils in this zone to be protected to such an extent that long-term stream health is maintained.

**22.2 Why didn't riparian areas have their own separate section?**

Riparian areas were discussed as a separate subsection under Water Resources. However, much of the public said they want a separate section for riparian areas. The Final Plan will have a separate riparian section.

**22.3 Has a Forest-wide survey of riparian systems been completed?**

An inventory has been completed showing the location and extent of riparian areas. However, a current Forest-wide assessment of riparian area conditions does not yet exist. This evaluation will be part of the watershed assessments as they are refined by field surveys. Percentages of riparian areas meeting Forest Plan objectives are estimates based on professional judgment.

A riparian classification was initiated in 1995. When necessary funding becomes available, this work will be completed and will then be used in making riparian area condition assessments.

Conservation practices to protect and restore riparian condition and function are required for all areas. When conditions below Forest Plan objectives are discovered, management practices are modified to promote recovery.

**22.4 Will the Clary and Webster report on Managing Livestock Grazing in Riparian Areas be incorporated as management direction?**

The Watershed Conservation Practices include several measures to protect riparian areas from grazing impacts. These include location of livestock concentration areas, stubble heights, timing of use, woody plants, and bank trampling. The final Forest Plan will incorporate the entire scope of direction contained in the Clary and Webster report, which will explain how stubble height requirements can change, depending on site condition and sensitivity.

**22.5 How will riparian area condition be monitored and used to make decisions?**

We will monitor selected riparian areas that are most likely to show an impact, where the knowledge gained is most likely to improve protection over a large area. We will compare condition with reference areas in the same physiographic area. Short-term monitoring will test compliance with standards and guidelines and change a project if needed. Long-term monitoring will assess trends in proper functioning condition and change standards and guidelines or adjust restoration programs if needed.

When a riparian classification and a current vegetation inventory are complete, they will also be used to describe condition. Language in the Final Plan/EIS will make this direction clearer.

**22.6 Can recreation impacts to riparian areas be controlled?**

Yes, within limits. Watershed conservation practices protect the integrity of riparian vegetation and soils from concentrated recreation use. These measures provide protection by properly locating and hardening concentrated-use sites. Exceptions occur where users

do not comply with regulations. We do not have enough people and money to prevent all such violations, so some problems will occur.

Protection measures are designed to protect conditions, not to define what use level would deteriorate conditions. A large group of skilled users can leave virtually no trace; a small group of careless users can cause serious impacts.

Motorized vehicles will be restricted to roads and trails. Signs will be used to notify the public of these restrictions. People will be able to retrieve harvested game with ATVs.

The public can choose to violate Forest direction. As with all types of enforcement, much gets accomplished through education and self-regulation.

**22.7 Will fish habitat be adequately protected?**

Yes. Watershed conservation practices will protect aquatic habitats if they are properly applied. They will also move degraded habitats toward robust conditions as defined by reference streams. Aquatic populations are also subject to impacts such as fishing pressure, predation, competition, and disease that our practices do not address.

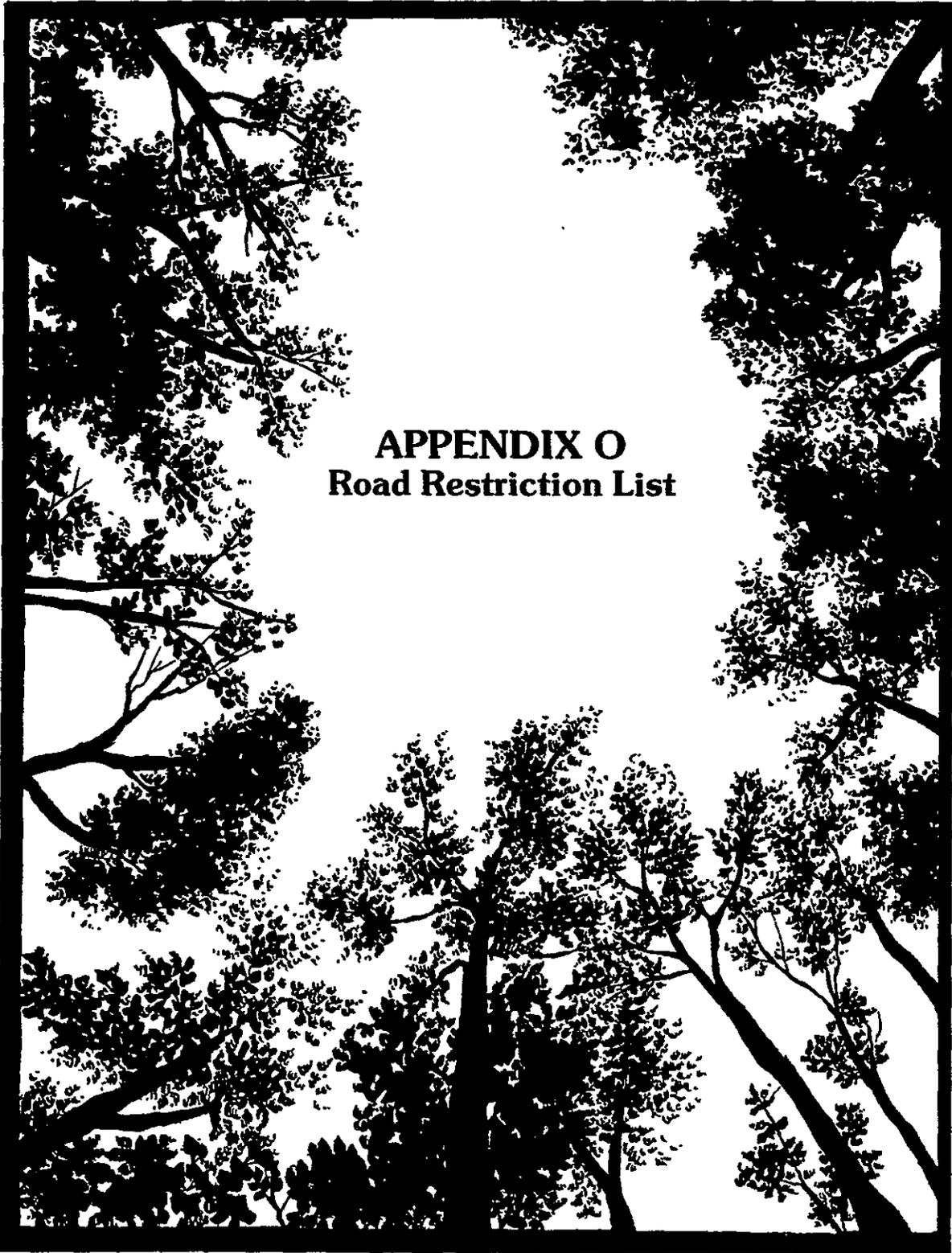
Fisheries were discussed in the Water Resources portion of the DEIS. Fish habitat is contained within the stream and riparian systems of the Forest. If those are being protected, then so is fish habitat. The connection between aquatic habitats and waters of the United States is well established in the Watershed Conservation Practices Handbook.

**22.8 Why didn't tables 3-27 and 3-28 on pages 3-123 and 3-124 of the DEIS include the riparian Land Type Association (LTA)?**

Land Type Association - 10 is Willows and Sedges on Floodplains (page 3-41) which covers riparian areas.

**99. We read all the letters. While many comments had to do with all the various aspects of the Plan or EIS, there also many comments that were very general. There were also comments telling us which alternative they preferred. And there were many who signed petitions, petitions that made good statements, but were not tied directly to the Plan or EIS. We read all of them.**

The comments that were general in scope or were votes or statements about day-to-day operations we gave a code of 99.



**APPENDIX O**  
**Road Restriction List**

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## APPENDIX O

### Road Restriction List

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#### PURPOSE

This appendix lists roads and road segments which are candidates for some type of travel restriction. A decision has not been made on either which roads are to be restricted or the type of restriction.

Each District will do further analysis (project level NEPA) to determine if a road will be restricted to motorized travel, obliterated, or added to the Forest road inventory. The analysis will be performed in the next few years and public involvement/participation will be a part of the process.

For additional information, contact the District upon which the road or road segment is located.

#### LIST

Divide District

<u>FS CODE</u>	<u>DESCRIPTION</u>	<u>MILES</u>
D7	Road 640 1A at private boundary	1.0 mi
D8	Non-inventory spur road of road 650 (Groundhog Park)	2.5 mi
D9	Roads 350 1, 350.2, and 350 3 (Willow Creek)	5.7 mi
D35	Non-inventory spur road off road 649 1 (Shorty Gulch)	1.0 mi
D60	Roads 601 1 and 601 1C	3.5 mi
D61	Roads 601 1A and 601 1B	1.3 mi
D71	Road 630 2D	4 mi
D72	Road 630 2E	4 mi
D73	Road 630 2H	6 mi
D87	Non-inventory road off road 328 (Munger Canyon)	1.0 mi
C2	Non-inventory road section above Broadhead Acres Ranch	1.0 mi
C3	Non-inventory road section of McKenzie Road	3 mi
C5	Non-inventory road near the Creede Admin Site	3 mi
C9	Non-inventory spur road off road 501 above camp	.3 mi
C11	Non-inv spur road to water development off road 600	1.0 mi
C12	End section of road 537 1 (Jarosa Mesa)	2.0 mi
C14	Road 518 1 south of Carson Townsite	1.5 mi
C16	Roads 513 4 and 513.5 above Rito Hondo	1.0 mi
C20	Road 539 1 from timber sale to S Lazy U Ranch	2.0 mi
C22	Road 502 1A (Phoenix Park crossing to 787 trail)	3 mi

## Saguache District

<u>FS CODE</u>	<u>DESCRIPTION</u>	<u>MILES</u>
S2	Non-inventory road off end of road 676	1.5 mi
S3	Non-inventory spur road off road 676	.5 mi
S6	Road 668 1	3.0 mi
S6	Non-inventory road connecting roads 673 and 668 1	.8 mi
S7	Non-inventory road off road 734	1.5 mi
S8	Road 737 1A	1.1 mi
S9	Non-inventory short cut on road 787 3F	.3 mi
S10	Extended end portion of road 787 3F	.9 mi
S13	Non-inventory spur road off road 707	1.3 mi
S14	Non-inventory loop road off road 684	2.2 mi
S15	Non-inv group of roads off end of road 680.2B	3.7 mi
S17	Non-inventory loop road of road 707	.8 mi
S18	Non-inventory loop/group of roads off road 707	2.4 mi
S24	Non-inventory spur road off road 720	.5 mi
S25	Non-inventory spur road off road 720	.5 mi
S26	End section of road 810 3	.8 mi
S27	Road 781	2.0 mi
S28	Non-inventory spur road off road 784 1A	2.0 mi
S29	Portion of road 865 on USFS land	1.5 mi
S30	Section of road 707	1.3 mi
S31	Non-inventory spur road off road 619 1	.8 mi
S35	Non-inventory spur road off road 619 1 (Brown's Park)	.5 mi
S40	Non-inventory group of roads off road 675 (Moon Pass)	1.3 mi
S42	Road 750 2B	.5 mi
S43	Non-inventory spur road off road 750	.5 mi
S44	Section of road 782	.5 mi
S45	Non-inventory road spurs off road 845(Graveyard Gulch)	1.0 mi
S46	Non-inventory road connecting roads 707 1B and 707 1c	.8 mi
S48	Non-inventory spur road off road 706	1.5 mi
S49	Non-inventory spur road off road 706	.3 mi
S50	Non-inventory spur road off road 720	.3 mi
S51	Non-inventory spur road off road 779	.8 mi
S52	Non-inventory spur road off road 779	1.3 mi
S53	Non-inventory spur roads off road 667	.3 mi
S54	Non-inventory spur road loop on road 760 2B	1.1 mi
S55	Segment of road 652	1.1 mi
S56	Non-inventory spur roads off road 760	.3 mi
S57	Non-inventory spur road off road 760(California Gulch)	.1 mi
S58	Non-inventory spur road off road 760	.1 mi
S59	Non-inventory spur road off road 729	.1 mi
S60	Non-inventory spur road off road 739	.1 mi
S62	Non-inventory spur road off 620 4 wheel drive road	.2 mi
S63	Non-inventory spur road off 620 4 wheel drive road	.3 mi
S65	Road 857 2A (Lucky Boy Gulch)	1.0 mi
S66	Non-inventory section of road at end of road 855	.8 mi
S67	Non-inventory spur road off road 885 (Horse Canyon)	.5 mi
S68	Non-inventory spur road off road 810 (Bear Creek)	1.5 mi
S69	Non-inventory spur roads off road 787 3D	1.5 mi
S70	Non-inventory loop road off the end of road 810	.8 mi

Conejos Peak District

<u>FS CODE</u>	<u>DESCRIPTION</u>	<u>MILES</u>
CP2	Non-inventory road off road 117 (Arkansas Crk)	.8 mi
CP13	Road 120 1A (Grouse Creek)	5 mi
CP16	Non-inv section of road above private off road 103	.8 mi
CP17	Non-inventory road to Horn Peak off road 125 2B	8 mi
CP19	Non-inventory group of roads off road 103 2A	2 1 mi
CP23	" " " " " " " "	
CP25	Non-inventory road between roads 103 2A and 106	8 mi
CP28	Non-inventory road on the north side of Black Mtn	1 2 mi
CP30	Non-inventory spur roads off road 101	1 1 mi
CP31	" " " " " " " "	
CP32	" " " " " " " "	
CP34	Portion of road 253	1 3 mi
CP39	Non-inventory spur roads off road 252	1 5 mi
CP40	" " " " " " " "	
CP46	Non-inventory spur road connecting roads 252 and 253	1 5 mi
CP50	Non-inventory spur road off road 103	3 mi
CP51	Non-inventory spur road at the end of road 103 3C	7 mi
	Group of roads proposed for closure by Willow Mtn EIS	13 0 mi