FINAL ENVIRONMENTAL IMPACT STATEMENT VOLUME 2

for the

WHITE RIVER NATIONAL FOREST
LAND AND RESOURCE MANAGEMENT PLAN 2002 REVISION

Eagle, Garfield, Gunnison, Mesa, Moffat, Pitkin, Rio Blanco,
Routt, and Summit Counties, Colorado

Lead agency:

USDA Forest Service
White River National Forest
PO Box 948
Glenwood Springs, CO 81602

Responsible official:

Rick Cables, Regional Forester
USDA Forest Service
Rocky Mountain Region
PO Box 25127
Lakewood, CO 80225
(303) 275-5350

For further information contact:

Martha Ketelle, Forest Supervisor
White River National Forest
PO Box 948
Glenwood Springs, CO 81602
(970) 945-2521

E-mail address for general forest information:
whiteriverso/r2_whiteriver@fs.fed.us

Abstract

Volume 3 of the **final environmental impact statement** (FEIS) presents supporting analysis and documentation prepared during the land and resource management plan revision for the White River National Forest. This volume includes the agency response to public comment on the draft forest plan and draft environmental impact statement (DEIS).

Note to readers

The Forest Service believes that readers should be given notice of several court rulings related to public participation in the environmental review process. First, reviewers of Draft EISs must structure their response to the proposal to make clear the reviewer's position and contentions [*Vermont Yankee Nuclear Power Corp. v. NRDC,* 435 US 519, 53 (1978)]. In addition, environmental objections that could be raised at the DEIS stage but are not raised until after completion of the FEIS may be waived or dismissed by the courts [*City of Angoon v. Hodel,* 803F.2d 1016, 1022 (9th Circuit 1986) and *Wisconsin Heritages, Inc. v. Harris,* 490. Supp. 1334, 1338 (E.D. Wis. 1980)].

Please recycle this document when it is ready to be discarded.

The U. S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, or marital or family status (not all prohibited bases apply to all programs). People with disabilities who require alternative means for communication of program information (Braille, large print, audio tape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination, write: USDA, Director, Office of Civil Rights, Room 326, W. Whitten Building, 1400 Independence Ave. SW, Washington, DC 20250-9410, or call (202) 720-5964 (voice and TDD). The USDA is an equal opportunity provider and employer.

Contents

VOLUME 2—RESPONSE TO PUBLIC COMMENT ON THE DRAFT FOREST PLAN AND DEIS

PREFACE AI-1
Abstract Ai-1
Introduction Ai-1
Background Ai-1
The Analysis of Public Comment Ai-3
Considering Different Types of Comments under the National Environmental Policy Act Ai-6
How to Use this Document Ai-8
Executive Summary of Public Comment prepared by CAT Ai-8

RESPONSE TO COMMENTS A1-1
Chapter 1 Purpose, Need and Significant Issues A1-1
Planning and Decision Processes A1-1
Decision-making and Public Influence A1-1
Purpose, Need and Significant Issues A1-28
Chapter 2 The Alternatives A2-1
Preferred Alternative A2-4
Modified and Non-Agency Alternatives A2-7
Chapter 3 Affected Environment and Environmental Consequences A3-1
Topic 1 Biological Diversity and Ecosystem Components A3-1
Part 1—Physical Elements A3-1
Part 2—Biological Diversity A3-18
Part 3—Biological Elements A3-33
Topic 2 Travel Management A3-87
Part 1—Travel Management and Infrastructure A3-87
Part 2—Landownership A3-124
Part 3—Special Use Authorizations A3-128
Topic 3 Recreation Management A3-132
Part 1—Recreation Management A3-132
Part 2—Ski Areas A3-174
Part 3—Aerial Transportation Corridors A3-203
Part 4—Scenery A3-209
Topic 4 Roadless Areas and Recommended Wilderness A3-211
Topic 5 Special Areas A3-220
Part 1—Heritage Resources A3-220
Part 2—Research Natural Areas A3-222
Part 3—Wilderness A3-223
Part 4—Wild, Scenic, and Recreation Rivers A3-227
Part 5—Caves A3-228
Part 6—National Trails A3-229
Part 7—Scenic Byways A3-229
Part 8—Special Interest Areas A3-229

Topic 6 Timber Management A3-231
Topic 7 Communities A3-254
Part 1—Communities of Place A3-254
Part 2—Communities of Interest A3-260
Topic 8 American Indian Rights and Interests A3-268
Topic 9 Other Considerations A3-268
DEIS Appendices A3-269
Appendix B Description of the Analysis Process A3-269
Appendix D Historic Range of Variability A3-270

Chapter 4 Respondents and Scanned Governmental Response Letters A4-1
List of Respondents to the Draft Forest Plan and DEIS by Affiliation A4-1
Government Agency Comment Letters A4-9

APPENDIX A
RESPONSE TO COMMENTS ON THE DRAFT FOREST PLAN AND DEIS

Preface

Abstract

This appendix includes a summary of public involvement activities and efforts made to solicit public input in the forest plan revision process, a description of the formal public comment analysis and response to comment process, and a list of public concerns and responses. Public concern statements and our responses are organized by section to mirror the order of the **final environmental impact statement** (FEIS) by topic area. The appendix also includes copies of the city, county, state, federal, and tribal agency letters and a list of governmental and organizational response letters.

Introduction

As a federal agency, we are required to solicit public comment on our draft plans involving significant actions under the National Environmental Policy Act (NEPA). Further, we are directed to "assess and consider [the resulting] comments both individually and collectively." In addition, we view such comments as critical in helping us to shape a responsible plan for management of the White River National Forest that best meets the Forest Service's mission, legal mandates, the goals of NEPA and the National Forest Management Act (NFMA), and the interests of the American public as a whole. During the formal comment period, the public reviewed and commented on the DEIS and draft forest plan's alternative proposals for achieving the purpose and meeting the need for the proposed action to revise the 1984 Forest Plan.

Background

In 1994, we began preliminary work to revise the 1984 Revised Land and Resource Management Plan, or Forest Plan. We undertook formal inventories of the forest's natural and environmental resources using improved scientific methods and data processing techniques that were not available when the 1984 plan was developed.

In 1996, the Forest Supervisor published a **Monitoring & Evaluation Five-Year Report**, which reviewed the status of National Forest System lands administered by White River National Forest managers. This report found that forest conditions and public demands had changed significantly since inception of the 1984 Forest Plan, resulting in a need existed to revise it.

The Forest Supervisor then solicited public comments to help determine what the plan revision process should consider. After a series of open houses and media coverage, we received hundreds of comments from across the nation, including many from people who live near the forest. An interdisciplinary team of resource specialists and planners was charged with spearheading the plan revision process. This team reviewed issues raised by

the public and by other agencies in order to develop a framework for the next stages of plan development and analysis.

We then composed an **Identification of Purpose and Need** document, issued in August 1996, which summarized how public comments and monitoring and evaluation efforts had been used to determine what elements of the 1984 Forest Plan were most in need of revision. After extensive review, the interdisciplinary team identified six areas, called **revision topics**, on which to base the planning process: (1) biological diversity, (2) travel management, (3) recreation, (4) roadless areas, (5) special areas, and (6) timber suitability and allowable sale quantity. Many different issues fall within these broad categories. Other issues are addressed in Forest Service guidance.

In July 1997, we released another report titled **Analysis of the Management Situation** (AMS), which assessed the ability of the forest land area and natural resources to supply goods and services in response to the public's demand for them. The AMS also provided a foundation for developing a broad range of reasonable alternatives to the existing plan. The report reviewed the current and expected level of goods and services provided by the forest, made projections of public demands for resources, and discussed the need to establish or change management direction based on these conditions.

In the summer of 1997, we presented the revision topics to the local public in a series of 10 open houses held in Aspen, Avon, Carbondale, Denver, Eagle, Frisco, Glenwood Springs, Grand Junction, Meeker, and Rifle. We solicited further comments from the public at these open houses and through announcements in the local news media.

After completing the AMS, we turned our attention to formulating a preliminary array of forest management alternatives that responded to the six initial issues. These alternatives were based on the public comment received as well as on improved knowledge of the forest's resources recorded in our Geographic Information System (GIS) database.

By July 1998, we had developed a draft forest plan and six complete alternatives for its implementation. The alternatives were described in depth in **Chapter 2** of the DEIS. By design, each alternative represented a potential forest plan that met legal and administrative requirements and that could be implemented if selected.

The next step in the revision process was to evaluate the environmental consequences of the alternatives. A summary of these effects was presented in **Chapter 3** of the DEIS. For each forest resource, our resource specialists described its existing condition and discussed how the alternatives would affect it in a **draft environmental impact statement** (DEIS).

We released the draft forest plan and accompanying DEIS volumes for public comment in August of 1999. These documents generated intense interest and scrutiny, reflecting the public importance of White River National Forest management issues both locally and nationally. We received many public requests to extend the comment period, and a six-month comment period extension was directed congressionally. Therefore, the original 90-day comment period was extended to May 9, 2001. Nearly 14,000 individual responses—including letters, postcards, public meeting transcripts, and emails—were received from the members of the public, city, county, state, tribal, and federal officials, public interest organizations, and private businesses during the formal comment period.

The analysis process for reviewing this voluminous comment is described below. After carefully considering the wide range of public comments on the draft forest plan and DEIS as well as new information and legal direction, our interdisciplinary team made many changes to both the draft forest plan and DEIS in to produce the 2002 Forest Plan and accompanying FEIS. The FEIS also identifies our new preferred alternative, which may or may not be the alternative selected for implementation by the responsible official, the regional forester. The **record of decision** (ROD) notice will document the alternative that is ultimately selected for implementation and the rationale behind this decision.

The Analysis of Public Comment

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

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

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

Once stand-alone comments are identified, analysts assign each comment to a numerical code that identifies the overall subject area. They use a systematic numerical

categorization or "coding" structure that has been specifically tailored to project documents. Each project-specific coding structure is a tool to help sort comments into logical groups by topics. In this case, the coding structure was organized to follow the topic order of the DEIS and draft forest plan documents, and was designed to be inclusive rather than restrictive in order to sufficiently capture all comments. Depending on project complexity and needs, analysts may also assign secondary codes to track those comments that refer to such subtopics as specific plan or EIS elements, land areas, or individual roads or trails, to permit finer-scale sorting of comments. The coding structure and other supporting documentation is available in the administrative record at the Supervisor's Office in Glenwood Springs, CO.

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

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

The third phase of content analysis includes composing statements of **public concern** and then preparing a narrative summary. Analysts review the entire comment database, sorted by topic area, and then write public concerns to summarize comments that present similar arguments or positions. Each public concern is worded to capture the action that one or more members of the public feel the White River National Forest should undertake and provides the decision-maker with a clear sense of actions the public is requesting. Because each concern statement is a summary, it can represent one or many comments, depending on the actual comments submitted. Concern statements range from extremely broad generalities to extremely specific points because they reflect the content of verbatim public comments. Once the comments have been exhaustively reviewed and the range of concerns identified, CAT then submits a **Summary of Public Concerns** report to the interdisciplinary team, who is responsible for the next stage of comment consideration, issue identification and response to comment. At this stage, the interdisciplinary team determines of whether comments are substantive and in scope, and then composes responses to comment.

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

Content analysts also prepare a final content analysis summary report that includes a narrative description of public comment by topic, a list of public concerns addressing the specific resource and management considerations, and representative supporting excerpts from the original responses. Each sample excerpt is linked back to the complete original

response using the response identification number included in the excerpt attribution. For more information on the content analysis process, the reader may contact the Forest Service Content Analysis Team in Salt Lake City, Utah.

It is important to note that during the process of identifying concerns, all comments have been treated equally—they are not weighted by organizational affiliation or status of respondents, and it does not matter if an idea was expressed by thousands of people or a single person. Emphasis is placed on the content of a comment rather than who wrote it or the number of people who agree with it. The process is not one of counting votes and no effort was made to tabulate the exact number of people for or against any given aspect of the DEIS and draft forest plan. The executive summary report narrative does include very general indications of the strength of public feeling found in the comment database for informational purposes. However, these comparatives must be used with caution, as they are more qualitative than quantitative in nature. Although these qualifiers give a general sense of public sentiment, they should be interpreted with caution—those who responded do not constitute a valid random or representative sample of the general public. Please review the *Stakeholders* section in FEIS Volume 2, Chapter 3, Topic 7, Part 2 for a scientific and statistically-based survey of stakeholder opinion, as well as to find interesting general correlations between our sociologist's statistically-based research and the CAT Executive Summary qualitative findings.

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

Table A-1 presents three measures that give a general picture of the scope of public response to the DEIS and draft forest plan.

Table A-1
Number of Responses, Signatures, and Comments Received During the Public Comment Period for the draft forest plan and DEIS

Number of Responses	Number of Signatures	Number of Comments*
13,991	20,168	27,367

Note: **This count includes comments from each master organized response campaign letter, but not the total number of the comments submitted from all respondents of each response campaign.*

Considering Different Types of Comments under the National Environmental Policy Act

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

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

We classified comments, or the concerns identified from them, as either those that fall within the scope of decision-making for the plan revision or those that fall outside of the scope for any number of reasons described below. Counsel on Environmental Quality (CEQ) regulations define "scope" and require the White River National Forest to explain why comments are determined out of scope.

Generally, the scope of the plan is the range of connected, similar or cumulative actions, the alternatives and mitigation measures, and the direct, indirect, or cumulative impacts to be considered in the environmental impact statement.

If we considered a concern out of scope, we include an explanation of why in this document. Generally, the types of comments received, and concerns identified, that were considered out of scope include those that:

- Do not address the purpose, need, or goals of the White River National Forest 2002 Forest Plan Revision (e.g. propose an action in areas beyond White River National Forest jurisdiction or that are not directly related to the action proposed in the plan, or relate to day-to-day operational issues such as law enforcement procedures or road maintenance).
- Address concerns that are already decided by federal law or national policy.
- Suggest an action not appropriate for the current level of planning (site-specific decisions to construct new roads, campgrounds or facilities, to offer special use permits or the sale of timber resources).
- Propose untenable restrictions on management of the forest or conflict with approved plans not being revised in the forest plan revision process.
- Did not consider reasonable and foreseeable negative consequences.
- Point to only minor editorial corrections.

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

- Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement.

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

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

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

How to Use this Document

This appendix is divided into the following sections: this Preface, which describes how public comments were analyzed, how concerns were used in preparing the FEIS and 2002 Forest Plan, and an executive summary of public comment; Chapters 1-3 (corresponding to Chapters 1-3 of the DEIS and the accompanying appendices); Chapter 4, which offers a summary of basic response letter demographics; Chapter 5, which includes scanned copies of response letters received from city, county, state, federal, or tribal agencies or representatives; and Chapter 6, which includes a list of CAT staff involved in both the content analysis of public comment and technical assistance in the response to comment process and document preparation.

Executive Summary of Public Comment prepared by CAT

INTRODUCTION

The White River National Forest faces a significant challenge in its forest plan revision process. As stewards of national forest on which recreational uses now predominate, managers are faced with the daunting task of balancing vested private and commercial interests with the biological needs of these mountainous ecosystems in the context of the legal mandates of the Forest Service.

This Executive Summary provides an analysis of the major themes and concerns submitted by the public during the official comment period for the White River National Forest proposed Land and Resource Management Plan (LRMP), or draft forest plan, and accompanying Draft Environmental Impact Statement (DEIS). These concerns range in nature from broad issues to technical specifics. The extensive public comment received

by the agency demonstrates the intense interest, depth of feeling, and level of concern of the public regarding the management of the White River National Forest.

Review and Analysis of Public Comment

The proposed Land and Resource Management Plan, maps sets, supporting DEIS, and appendices were released for public review and comment in August 1999 for a 90-day comment period with a closing date of November 9, 1999. The comment period was eventually extended an additional six months, with the official close of comment moved to May 9, 2000. Nearly 14,000 individual responses were received during the extended comment period from a diverse array of stakeholders and interested parties from around the country.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. Further, those who respond do not constitute a random or representative public sample because they are self-selected, unlike scientifically designed surveys or polls. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may include businesses, people from other countries, children, and people who submit multiple responses. Therefore, caution should be used when interpreting comparative terms provided in this report. Every substantive comment and suggestion has value, whether expressed by one respondent or many. All input is read and evaluated and the analysis team attempts to capture all relevant public concerns in the analysis process.

Public responses are tracked, documented, and analyzed using a process called content analysis. Content analysis consists in systematically compiling, categorizing, and capturing the full range of public viewpoints and concerns regarding a planning project. The goal of content analysis is to provide a set of analytical tools for decision-makers to allow full consideration of voluminous public input received on a project. A complete mailing list is developed, and individual responses are assigned unique tracking numbers, then read and analyzed by a specialized team. Specific comments are identified and assigned a subject category number, and all comments are entered verbatim into a database. This database provides a robust analytical tool for identification of public concerns and for sorting of demographic and topic information.

The results of this process serve two related purposes in public land management planning. The first is to fulfill the legal mandate of the National Environmental Policy Act and accompanying Council on Environmental Quality regulations. These statutes require planning teams to seek public comment on significant proposed actions and use it to clarify, modify, or revise analyses and conclusions in order to improve agency decision-making. The public can thus provide a vital contribution to planning efforts. The second goal of content analysis is to provide the public a review of the range of concerns, background issues, and substantive comment submitted on a project.

GENERAL ANALYSIS

The draft forest plan and DEIS have inspired intense public debate focused primarily on recreational and biological resources. Those supporting the Preferred Alternative D believe it represents a reasonable balance of interests between resource protection and resource use. Many of the supporters of Alternative D specifically endorse the proposed limitations on ski area expansion and motorized recreation as well as the alternative's emphasis on ecosystem function. Those opposed to Alternative D tend to fall into two broad groups. One group believes the Preferred Alternative focuses too heavily on active management and does not go far enough to protect forested ecosystems. Therefore members of this group endorse Alternative I or request a significant modification of the Preferred Alternative. The other group believes Alternative D is too restrictive, especially in regards to motorized and developed recreation, and endorses Alternative C or some modified version of Alternative C.

While there is overall agreement among respondents that increasing recreational and urban interface pressures necessitate changes in forest management, there is disagreement as to how those pressures should be alleviated. The reasons for the polarity of opposition to the Preferred Alternative is well illustrated in the debate between supporters of Alternative D or I and supporters of Alternative C or a modified C. This debate is driven in large measure by competing values and viewpoints. In general, those who support Alternative I or D and those who support Alternative C fall into two camps in terms of how they value forest resources and in terms of how they view the role of government. The differences are not always clearly defined, and may sometimes be more perceptual than real. Therefore common values and fundamental points of agreement among various stakeholders tend to be obscured by conflicting social values and underlying assumptions. These values, personal experiences, and assumptions lead to the expression of impassioned views on public land management in general and the White River Forest Plan revision in particular.

Most individuals, regardless of which alternative they support, identify themselves in terms of personal background, values, and direct experiences on the White River National Forest. It is clear that this national forest exerts a powerful influence on residents and visitors alike. Respondents care very deeply about the management of the White River National Forest and most express a strong sense of personal ownership. Those favoring the Preferred Alternative or Alternative I often identify themselves as human-powered users of public lands who prefer to hike, backcountry ski, watch wildlife, or the like. Advocates of Alternative C often identify themselves as persons connected in some way with tourist-dependent businesses, or persons who engage in motorized or developed recreation activities on public lands. It is worth noting that a sub-set of respondents among various user groups, including some motorized users and many downhill skiers, explicitly note that their own recreational opportunities could be restricted by the Preferred Alternative but they are willing to comply in order to protect the White River National Forest from being loved to death. "I realize that it [Alternative D] might restrict me from experiencing some wild places, but what will we have left in 100 years if this onslaught is left unchecked?" reflects one self-identified "avid outdoorsperson."

Individuals from all recreational user groups use similar terms to describe why they value recreating on the White River National Forest. Most often mentioned are scenic beauty, open space, the wilderness experience, wildlife, opportunities for developed and

dispersed activities not available or affordable elsewhere, and personal challenge. However, there is a fundamental lack of agreement over which activities are compatible with each other and with preserving the environment. The mix and levels of acceptable activities are also hotly contested. It is clear that the preferred public land management approach of each group is rooted in basic differences in viewpoint and values regarding the utility and highest public benefit of National Forest System natural resources.

Those favoring Alternative I tend to see National Forest System lands as whole ecosystems which intensive human activity disrupts. Thus for these respondents, protecting the White River National Forest consists in minimizing human disturbance and encouraging or mimicking natural processes. Active management activities are thus often viewed as unnecessary and unwise meddling in complex natural systems that humans do not yet fully understand. Supporters of Alternative I often note the Forest Service's acknowledgement that decades of well-meaning fire suppression for forest health have resulted in exactly the opposite condition. They therefore question whether modern management practices are any better. Those who favor Alternative I see the forest as an ecosystem whose long-term functioning is best preserved by restoring natural disturbance regimes such as fire, insect, and disease cycles. They note that disease, death, and decay are a normal and in fact crucial element of natural systems, and extensive human interference harms the delicate balance of nature. Persons holding this view place a high priority on protecting the environment. They believe intact forest ecosystems should be protected for their own intrinsic value, for the benefit of wildlife, and for the non-commodity benefits public lands offer to humans. Many thus describe the White River National Forest as an important provider of under-appreciated but vital ecosystem services such as biodiversity, clean drinking water and air, solitude, and spiritual renewal. As such, they believe that ecosystem protection is rarely compatible with intensive motorized use or traditional commodity resource extraction.

Indeed, according to many proponents of both Alternative D and I, satisfying human desires for forest resources must take second place to satisfying the equal human need for natural forest ecosystems and for quiet, natural places to escape an increasingly urbanized and car-dominated world. They are not entirely insensitive to the competing concerns of those whose sources of enjoyment or livelihood depends on more intensive uses of public lands. But they do believe that the need for forest protection outweighs other concerns, and that those concerns can in fact be mitigated, for example, through designation of less sensitive areas for motorized and mechanized recreation, maximizing development within existing ski area boundaries, and development of alternative materials to forest products.

While they value many similar forest characteristics, advocates of Alternative C perceive proper management of National Forest System lands differently than those who favor Alternative D or I. They also see national forests in terms of the resources they offer for human use, but identify a very different set of primary uses. Many of these users do express significant concern for the environment. However, they feel that negative impacts of human activity are greatly exaggerated. Respondents often note that they themselves are responsible users who cause no harm. They are therefore personally insulted by accusations to the contrary. Since they feel that their activities are legitimate and sustainable uses, any proposed restrictions on their activities are perceived as a violation of fundamental fairness, democratic principles, and civil liberties. Some express the fear that if Alternative D or I is implemented, most forest roads will be eventually be gated

and “No Trespassing” signs will be posted at the forest boundaries. While most opponents of Alternative D do not take this extreme of a view, they do feel that the Forest Service is over-reacting to unsupported charges of damage and legal threats by environmentalists.

Those supporting Alternative C tend to see national forests as natural systems whose health is often threatened by unmanaged natural processes. They tend to favor a utilitarian or agricultural model whereby human ingenuity and modern timber management can maximize forest health for human benefit. Indeed, forest health is often likened to human health, with disease and decadence seen as challenges to be overcome by proper scientific management. For these people, protection consists of managing these lands for sustainable resource extraction, controlling fire, and fighting insect and disease outbreaks aggressively. Many argue that the landscape has changed dramatically since European settlement, and given more than a century of active human intervention in these forested ecosystems, it is unwise, unscientific and irresponsible to now step back and allow the health of these forests to suffer. Further, they point out that extensive regional population growth and housing development on private land adjacent to the national forest has altered the management framework dramatically. These respondents argue that the management approach dictated by the Preferred Alternative sentences the White River National Forest to increased disease and insect damage, wasted timber resources, catastrophic wildfire, and degradation from concentrating recreational use onto a small land base. Moreover, they argue, prudent management benefits wildlife as well as humans by creating varied game habitat. Finally, access to such forest resources as timber, lift-served skiing, and motorized recreation is seen by many as an important component of regional economic health which will be threatened by adoption of the Preferred Alternative.

Thus what separates the supporters of various alternatives is a difference in perspective regarding the fundamental nature of public lands, ecosystem health, appropriate human uses, and the role of land managers. This difference in perspective gives way to significant polarization on all sides and the sentiment that all users have a great deal to lose depending on the outcome of the forest plan revision. This in turn leads to public concern over the objectivity of the decision-making process and each group’s ability to influence the forest plan revision process. Advocates of Alternative C defend activities that those favoring Alternatives D or I decry, and vice versa. Both sides charge that the other is well financed and overly influential, and thus members of each group frequently see themselves as the underdog. Advocates of Alternative C often express a great deal of resentment over what they perceive to be a condescending attitude by environmental groups who, they believe, are the ones driving the revised plan. Some writers feel discriminated against and disenfranchised. They believe their voices no longer count nationally and that the only voices that do count are those of the environmentalists. Conversely, supporters of Alternatives D or I often assert that vested economic interests such as the ski, real estate, timber, and mining industries and the motorized vehicle lobby continue to hold excessive influence over both local forest officials and elected representatives at all levels of government. Since fish, wildlife, and old-growth trees can’t vote or donate money to political campaigns, they say, individuals and environmentalists must staunchly defend these values.

This perception of undue influence and disenfranchisement accentuates the distrust many advocates of Alternative C harbor for the federal government as a whole. For example, many say that the Forest Service is straying from its multiple use mandate. Those who favor Alternative I do not generally express the same level of distrust toward the federal government. However, they do express dismay at past Forest Service practices that they feel have favored commodity production and ski development over less intensive uses and protection of biological resources. Many cite the recent agency approval of the Category III expansion of the Vail Ski Resort as an example that commercial influences still hold sway. They urge the Forest Service to continue to refocus its mission to better reflect the goals of federal environmental laws such as the Clean Water and Endangered Species Acts, and repeatedly encourage the Agency to base its decisions on sound ecological science.

In summary, those favoring Alternative I and those favoring Alternative C appreciate similar natural characteristics of the White River National Forest but hold very different assumptions and beliefs regarding the true environmental effects of various uses and the proper mix of management activities. These two groups reflect shifting demographics and values within American culture at large. As the national economy shifts from one based on manufacturing and raw materials to technology and services, and populations become increasingly urban, value conflicts arise. Responses from the residents of the communities surrounding the White River National Forest reflect this shift. Many visitors and new residents view public lands as a recreational amenity rather than a crucial source of raw materials and related jobs. Meanwhile, many long-term residents find themselves being squeezed out by skyrocketing real estate values, and those whose livelihood still depends directly upon access to forest resources feel that they are being unfairly accused of poor stewardship and widespread damage. In the context of the White River National Forest Land and Resource Management Plan revision, these differences take on sharp contrast. One group sees the revision as an overdue step toward protecting the forest's natural ecosystems, ultimately improving human well-being and preserving the health of the forest. The other group sees it as a recipe for declining forest health, a threat to human freedom, and a further attack on their way of life. With the rest of the country increasingly boxed in by rules and restrictions, they see National Forest System lands as a crucial counterbalance.

These competing views are expressed by respondents within the context of a number of issues relevant to the forest plan revision. The forest identified six management themes in the DEIS, which are biological diversity, travel management, recreation, roadless areas, special areas, and timber suitability and allowable sale quantities. The commenting public identified a set of major themes which are, for the most part, complementary to those identified by the Forest Service. The themes most often addressed by respondents are habitat and connectivity, recreational access, ski area expansion, social and economic values, and the urban interface. The themes originally identified by the Forest planning team and by the public surface repeatedly in differing contexts throughout this document.

Agency Response to Comments

The following public concern statements are identified by a letter and number in order to facilitate tracking throughout the analytical and response process. These numbers are for identification purposes only. They are not necessarily sequential, not all numbers in sequence have been used due to the iterative nature of public concern identification, and these numbers in no way indicate a ranking by priority or importance. As described in the Introduction section, each public concern statement was derived from one or many individual public comments. However, these supporting comments have been deleted here due to space constraints. Our interdisciplinary team reviewed both the public concern statements and the supporting comments in the preparation of our responses. Interested parties may consult the full CAT reports and the reading file of original response letters on file at the Supervisor's Office in Glenwood Springs, CO.

APPENDIX A
RESPONSE TO COMMENTS ON THE DRAFT FOREST PLAN AND DEIS

The following public concern statements are identified by a letter and number in order to facilitate tracking throughout the analytical and response process. These numbers are for identification purposes only, and in no way indicate a ranking by priority or importance. However, we have organized the topical sections to mirror the final environmental impact statement (FEIS). As described in the Introduction section, each public concern statement was derived from one or many individual public comments. However, these supporting comments have been deleted here due to space constraints. Our interdisciplinary team reviewed both the public concern statements and the supporting comments in the preparation of our responses. Interested parties may consult the full Content Analysis Team reports and the reading file of original response letters on file at the Supervisor's Office in Glenwood Springs, CO.

Chapter 1
Purpose, Need and Significant Issues

PLANNING AND DECISION PROCESSES

Decision-making and Public Influence

P1 Public Concern: The Forest Service should base its final decision on the will of the majority of citizens.

Forest Plans are developed according to the National Forest Management Act (NFMA), the National Environmental Policy Act (NEPA) and several other laws, regulations and policy. This direction calls for public participation and involvement in the planning process. Public comments are considered in the final documents and the final decision, however there are several additional factors contributing to the decision. The Forest Plan must be in compliance with all applicable legal direction. Forest plans must also address concerns of interested people. Public concern is incorporated to the extent possible and practical in accordance with legal mandates and agency policy. Forest planning involves interested individual and groups throughout the process although it is not a voting process.

P2 Public Concern: The White River Forest Plan Preferred Alternative should represent a compromise of all interests and concerns.

Forest Plans are created in accordance with NFMA, NEPA, and other laws including the Multiple Use Sustained Yield Act. The Forest Plan will continue to offer a wide variety of human uses of the White River National Forest. The amount of each use that the forest can sustain, however, is at issue in the plan. The range of alternatives presented in the DEIS and FEIS provides a variety of ways that uses of the forest can be distributed.

Alternative K was created in part to address public concerns. See Chapter two of the FEIS for a description of alternative K.

P3 Public Concern: The Forest Service should resist the undue influence of special interest groups on the forest plan revision process.

All comments were reviewed and considered during the formulation of the FEIS. Many letters were submitted by organizations representing specific interests. These comments were reviewed in the same way that comments from individual citizens were reviewed.

Some of these organizations and businesses have economic ties to the Forest and are dependent upon the Forest for their livelihood. All of these uses must conform to the guidance provided in the forest plan. Comments to the contrary cannot be considered. These uses, however, are appropriate and necessary to implement the Forest Service multiple-use mandate.

Please see the introduction to this appendix for a description of how all comments were reviewed and how public concern statements were created. All comments received, regardless of the sender, were part of the same content analysis process.

P4 Public Concern: The Forest Service should resist the attempts by elected officials to unduly influence the forest planning process

As part of the executive branch of government, the Forest Service carries out its mission of caring for the land and serving people within the guidelines it is given by the Administration and Congress. The Forest Service also tries to work with other agencies and state governments within this same framework. The natural resources the Forest Service manages are highly valued and the issues associated with them are often extremely controversial. As a part of government, politics form part of the decision space within which the agency must operate. Other factors weighed in the decision include laws, agency direction, and public comment. While politics are a part of the decision process, it is one of many factors that are considered when making a decision about the future management of the White River National Forest. Politicians, as elected officials, represent a public constituency. Consideration of their input, as other public input, is therefore appropriate and necessary.

P5 Public Concern: The Forest Service should resist efforts by opponents to delay a management decision by requesting more scientific impact studies.

Forest specialists review the most current scientific studies available and use them in forest plan analysis. This is an on-going process that will continue after the Plan is completed. As more studies and more information becomes available, they will be reviewed and incorporated into the Plan as appropriate.

P6 Public Concern: The Forest Service should give priority to local concerns in forest management decisions. – and-

P7 Public Concern: The Forest Service should give equal consideration to the concerns of the national citizenry and those of local residents.

All comments and concerns are reviewed by the Forest Service and addressed as part of the NEPA process. The White River National Forest is a national resource and decisions regarding the management of this forest are made in conjunction with national as well as local concerns. Working closely with local governments, interest groups and user groups is an important part of the decision-making process. This will continue, and develop further, as the forest plan is implemented.

Although Congressman McInnis provided an alternative for consideration, it is not appropriate for the White River National Forest to view it as representing the opinion of all people. This alternative does represent the desired management of the Forest for a certain segment of the population within Colorado, and perhaps elsewhere. There are many other viewpoints, however, within Colorado and within the nation that the Forest must consider. All of these comments and concerns are valid, were reviewed, and were incorporated to the extent practical.

P8 Public Concern: The Forest Service should consider extending the length of the public comment period for the forest plan. –and-

P8.1 An extension of the public comment period is needed.

Response: On August 6, 1999, the Notice of Availability of the Proposed Revised Forest Plan and accompanying DEIS was issued in the Federal Register. This initiated a 90-day comment period. On November 1, 1999, the first extension to the comment period was announced in the Federal Register, doubling the comment period to 180 days. Due to a large number of requests to extend the comment period even further, a second extension of the comment period was granted. This second extension, extending the comment period an additional 90 days to May 5, 2000, was announced in the Federal Register on December 23, 1999. This nine-month long comment period provided adequate time for review by citizens, user groups, government agencies and other interested parties.

P8.2 An extension of the public comment period is not needed.

Response: The National Forest Management Act at 36 CFR 219.12 requires a comment period of at least three months. Sec. 1506.10(d) of the Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act states, “The lead agency may extend prescribed periods.” Given that the full documentation for this proposed action was approximately 1,700 pages, the agency believed it was important to provide ample time for the public to read and understand what was being proposed in order to provide written comments.

P9 Public Concern: The Forest Service should review the adequacy of public involvement efforts.

P9.1 Outreach

Response: Ten open houses were held in February and March 1997 to inform the public of the forest plan revision process. On August 6, 1997, the Forest published a Notice of Intent in the Federal Register to prepare an environmental impact statement in conjunction with the revision of the forest plan. Four working groups, consisting of stakeholders and interested parties, were formed to assist Forest staff in developing management options. These groups met frequently from November 1997 to February 1998. In addition, the Forest mailed newsletters to interested parties to inform them on the status of the planning process. Since the release of the draft planning documents in August 1999, the mailing list has grown from approximately 1,500 interested parties to more than 12,000. News releases and paid advertisements were used to notify the public of open houses held during the comment period. In addition, Forest staff met with all individuals and organizations upon request.

P9.2 Meeting Times and Access

Response: The White River National Forest covers approximately 2.3 million acres in nine counties in western Colorado. Meetings were held in communities where we have offices, as well as in Grand Junction and Denver. Open houses were held in the late afternoon and evening to accommodate schedules of working people. In addition, Forest staff met with stakeholder organizations at meetings set by them in locations other than on the Forest—this included Colorado's Front Range and communities such as Gunnison.

P9.3 Meeting Length

Response: At least three meetings/open houses were held in each of the communities where we have offices. Most of these meetings were three hours long with Forest staff, in all cases, willing to stay later or schedule meetings with interested parties at a later date.

P9.4 Handling of oral comments at meetings

Forest staff made significant efforts to explain to interested people that comments on the forest plan draft documents needed to be made in writing. At all meetings there were handouts with contact information including mailing addresses. This information was also distributed in newsletters and newspaper articles. Forest staff discussed many issues with people at meetings and had this background when working on final documents. Due to the magnitude of the interest, however, only written comments were incorporated into the content analysis process resulting in this appendix of concern statements and responses.

P10 Public Concern: The Forest Service should provide more information to the local press.

Response: The local media covered the Proposed Revised Forest Plan and accompanying DEIS extensively. From the time these documents were made available to the public until the close of the comment period on May 9, 2000, nearly 2,000 articles were clipped and filed from not only local newspapers, but Denver and out-of-state newspapers, as well.

P11 Public Concern: The White River National Forest should send paper copies of all requested documents to the public to accommodate those without computers or internet access at home.

Response: The cost to the government to print and mail a complete set of documents ranged from $80 to $90. In light of this fact, a postcard was sent to interested parties asking which documents they wanted to receive and what format—paper or CD-ROM—they preferred. Paper copies were provided to those requesting one. In instances where more than one paper copy was requested at the same mailing address, only one paper copy was provided. Paper copies of DEIS Summaries were made available to all requesters. Full, hardcopy sets were also available at all public libraries within the nine-county area and at all White River National Forest offices.

Efforts were made to ensure that documents were reasonably available. This includes making all documents available on the Internet and available to the public on CDROM. This approach applies to the distribution of the 2002 Forest Plan and accompanying documents as well.

P12 Public Concern: The Forest Service should make web-based resources more customer service oriented and provide additional web-based communications.

Response: The complete document was available on our website. This was the Forest's first endeavor to make such documentation available on the web. The Forest is continually updating the website and learning how to use web-based communications more effectively. The document was provided in Adobe Acrobat format, as this is a free program that is generally universally available and acceptable. This file format was chosen to make the electronic documents readable by as many people as possible.

The 2002 Forest Plan will also be available on the Forest's web site. Efforts were made to make the electronic copies more user friendly.

P13 Public Concern: The Forest Service should provide detailed information to the public in order to receive effective feedback.

Response: Detailed information (e.g., specialist reports) was available at all White River National Forest Service offices. The cost to reproduce all the maps and documentation related to proposed Forest Plan Revision and Draft Travel Management Plan would be prohibitive if provided as part of the document. However, Forest staff offered to meet with people and provide any additional information. Additional information, including resource specialists' reports, supporting documentation and other materials are available at the Supervisor's Office for review or copies can be requested.

P14 Public Concern: The interdisciplinary team should redesign the planning documents so they are easier to understand and use.

Response: The entire set of forest planning documents (Proposed Revised Forest Plan, DEIS, DEIS Summary and appendices) was approximately 1,700 pages long. Every effort was made to write in plain English and to use charts and maps to more effectively present information. Layout, which provides for greater ease in reading, was also considered when preparing this document. Efforts were made to ensure that the FEIS and supporting documents and maps are legible, understandable and written in plain language.

P15 Public Concern: The Forest Service should make management decisions only after public input has been given full consideration.

Response: Considerable effort was made to involve the public prior to publishing the Proposed Revised Forest Plan and accompanying DEIS. See response to P9. All comments received during the nine-month public comment period were considered in detail during the preparation of the 2002 Forest Plan and FEIS. These comments were read, catalogued, reviewed, and responded to. Many public comments resulted in the planning team having to revise sections of the FEIS and add information or do additional work. Likewise, the public opinions and comments were considered in the final decision making process in which the selected alternative was chosen.

For evidence of the changes made resulting from public comment, please see the description of alternative K in FEIS Chapter 2, the description of the Content Analysis process in the beginning of this Appendix, and the discussion of the decision making process in the Record of Decision.

P16 Public Concern: The Forest Service should be unbiased in its handling of public comment and assure that all input is considered.

Response: All public comments that were received by the close of the comment period were part of the content analysis process – a process that reviews and responds to all public input. No comments were ignored or discarded. Details of how this process worked can be found in the introduction to this appendix.

All public input was considered individually and equally. Individual comments were sorted by topic and entered into a database. Comments were then consolidated by topic into specific public concerns. Each public concern is responded to in this appendix.

P17 Public Concern: The Forest Service should give more consideration to original responses than to postcards when considering public comment in the decision process.

Response: Every comment received will be read and considered when developing the Revised Forest Plan and FEIS. A comment is a comment, whether it comes in the form of a “postcard campaign” or a letter from an individual or organization.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. A discussion of the types of comments and how they were considered is found in the Summary of Public Comments, a document prepared based on the analysis of comment letters. It has been, and will continue to be available on the White River web site.

P18 Public Concern: The Forest Service should disregard public comments that are based on misinformation.

Response: Every comment received was read and considered when developing the 2002 Forest Plan and FEIS. Many comments appeared to have been based on factually incorrect information, or misinterpretation of information in the draft documents. However, all comments were considered in the content analysis process, whether they appeared to be based on misinformation or not. Comments that were apparently based on factual errors or misinformation are responded to by correcting the error or by offering the agency's position on the issue.

P19 Public Concern: The Forest Service should assure timely map error corrections and make this information readily available to the public.

Response: All Forest Plan maps were reviewed and updated in light of internal and external concerns. For the 2002 Forest Plan, updated maps are available for review in any White River National Forest office. The Forest visitor map will be updated after the Travel Management Plan is finalized, after the forest plan is completed. Forest visitor maps are available at Forest Service offices for a fee.

P20 Public Concern: The Forest Service should increase public education efforts in order to achieve resource objectives.

Response: Conservation education is one of the many tasks the Forest Service undertakes. Partnerships with community groups and organizations is one way of spreading resource management messages. These activities are very important and will continue to be a tool used to spread information in the future.

P21 Public Concern: The Forest Service should encourage local businesses and governments to include responsible forest use guidelines in their marketing materials.

Response: The Forest Service has many brochures and pamphlets that explain all aspects of the Forest Service mission and work. This information is available to the public and local businesses, generally at no charge.

P22 Public Concern: The Forest Service should encourage comments from the public by making them feel like stakeholders.

Response: There were a significant amount of public involvement activities completed before the draft documents were made available to the public (see the response to P9). During the comment period, and during the crafting of the final documents, the White River planning team continued to meet and talk with individuals and groups regarding the plan. This effort was both formal and informal. Forest staff created an opportunity to meet with representatives of many groups and organization to gather information on values and attitudes on public land management. This effort was aimed at validating how people values and use the White River National Forests. This was one attempt by the Forest to recognize stakeholders and the way they interact with and value forest resources and opportunities.

The intent is to continue to have opportunities to work with members of the community to recognize the various ways in which people use and value the White River National Forest. By providing people with a variety of ways to work with the Forest Service and

other groups and organizations, there should be an increased understanding of the management issues and opportunities as well as the variety of public attitudes and values regarding national forest system lands.

P23 Public Concern: The Forest Service should focus planning efforts on consensus building and compromise.

Response: The Revised Forest Plan and FEIS is based on consensus building and compromise to the extent the input complies with federal laws and regulations. The difficulty arises when opposite views are expressed and both are viable. The Forest Service mission and manual and handbook direction guided the Forest in preparing the Revised Forest Plan and FEIS.

P24 Public Concern: The Forest Service should develop partnership arrangements with user groups.

Response: The Forest Service actively pursues partnership arrangements. Partnerships are an important tool for accomplishing management goals and completing specific projects. Partnerships and other types of agreements are commonly entered into with many types of user groups, governments and organizations. There are not specific provisions in forest plans, however, that advocate future partnerships. Identifying partners or partnership opportunities are not decisions made in forest plans, but are important tools to implement forest plan decisions.

P25 Public Concern: The Forest Service should ensure coordination of management activities with adjacent landowners by using Management Area 7.1 (Intermix).

The use of Management Area 7.1 received a great deal of public comment. There is a perception that the application of this Management Area will allow certain activities to occur that will not occur if this management area is not applied. This is not the case. The White River National Forest will consult, cooperate and involve government entities, landowners and stakeholders on all activities and projects regardless of the management area.

The intent of Management Area 7.1, however, is to highlight areas where private lands or lands in other ownership are adjacent to, or significantly intermingles with, the National Forest System Lands resulting in significant management challenges. These areas are meant to be areas where partnerships, cooperative agreements and other relationships can be fostered to work toward common goals. It is worth noting, however, that specific decisions regarding land uses will remain with the applicable landowners.

Intermix areas are discussed in Chapter 3 of the FEIS in the Social and Economics Topic, Local Government subheading and Intermix heading.

P26 Public Concern: The Forest Service should address urbanization by using Management Area 7.1 (Intermix).

Urbanization of private lands is a significant issue in many areas adjacent to the White River National Forest, especially in Summit County. Many comments were received that asked the White River to deal with urbanization by applying the 7.1 management area (Intermix). The Forest Service can enter into cooperative agreements and partnerships regarding how National Forest System lands along the forest boundary are managed, but

it is not within the authority of the Forest Service to make decision regarding any private land uses or developments, including urbanization.

There are many issues resulting from urbanization that the Forest Service can address – such as recreation uses, access, fuels reduction, and scenery. All of these issues are important and are addressed in the 2002 Forest Plan. Urbanization is discussed in Chapter 3 of the FEIS in the Social and Economics Topic, Economics subheading and Urbanization heading.

Site-specific issues and topics will be addressed at the time a specific agreements or partnerships is entered into by the Forest Service and any other landowner or government entity. This includes land ownership adjustment analysis, recreation uses and access, and other local issues.

P27 Public Concern: The Forest Service should coordinate with adjacent national forests to develop common standards and guidelines.

Response: The National Forest Management Act and related laws, regulations, directives and guidelines were used to develop the 2002 Forest Plan and FEIS. In addition, the Forest Service has a regional office for the Rocky Mountain Regional that coordinates issues similar to several adjacent forests. Some consistency and coordination was accomplished with forests that are adjacent to the White River. However, there will also be differences for several reasons – among the greatest include the staggered timeline for forests revising their plans. The Arapaho/Roosevelt and Routt National forests completed their forest plan revisions before the White River started. The Grand Mesa/Uncompaghre/Gunnison and the Pike San/Isabel National Forests have not yet started their forest plan revisions. Because there are differences in schedules, these plans are sometimes prepared under slightly different policies and agency direction. Laws have not changed, although some regulations, like the forest planning Regulations (36 CFR 219.12) have been revised during the planning cycle. This changes some aspects of forest plans and makes consistency challenging.

The attention on the White River forest planning effort, however, has resulted in regional discussions on many issues. The result of such discussion will be a consolidated, consistent approach for the forests that are initiating plan revisions in the near future. This includes the Grand Mesa/Uncompaghre/Gunnison and the Pike San/Isabel National Forests. These forests will have opportunities to incorporate direction on some issues that received significant attention on the White River. The White River planning effort resulted in updates to the Regional Desk Guide – the document that provides many types of direction to forests revising plans. One example of Desk Guide content is Forestwide Standards and Guidelines. By updating the Desk Guide to reflect some Standards and Guidelines in the White River 2002 Forest Plan, other forest plans in Colorado will contain similar direction.

P28 Public Concern: The Forest Service should subject memoranda of understanding to public review.

Response: At this time there is no procedure that requires public review of memoranda of understanding between government agencies. The forest plan cannot create or change such a procedure.

P29 Public Concern: The Forest Service should consult with the Bureau of Reclamation on future Ruedi Reservoir management priorities.

Response: The Forest Service consults with the necessary and required government agencies on forest projects. Any proposals to change or build recreational facilities on Reudi Reservoir will be available for public comment and input by any government agency.

P30 Public Concern: The Forest Service should continue to cooperate with the Army to allow issuance of military training use permits on the White River National Forest.

Response: There is no language in the Revised Forest Plan or FEIS that will change the long-standing and future relationship the Forest Service has with the military related to training-use permits. Permits will continue to be issued when activities are compatible with the 2002 Forest Plan. Similarly, the 2002 Forest Plan has been, and may be adjusted to allow for specific uses in certain areas.

The 2002 Forest Plan has specific provisions for allowing military training opportunities in two proposed wilderness areas—Dome Peak and Red Table Mountain. By addressing this use in these areas, the Forest Service is providing flexibility in the forest plan. The details of such uses (timing, intensity) will be found in the applicable permits and agreements between the agencies.

P31 Public Concern: The Forest Service should collaborate closely with state agencies on any development of aerial transportation corridors.

Response: Development of aerial transportation corridors will require a project-level Environmental Impact Statement, which would result in considerable input from state agencies and the public. The Forest Service is a cooperating agency with the Federal Highway Authority and the Colorado Department of Transportation on the effort to create a Programmatic Environmental Impact Statement to address potential expansion opportunities for Interstate 70. The White River will continue to be a partner in this effort throughout the life of the project. There are several transportation alternatives being examined in this project.

P32 Public Concern: The Forest Service should analyze the impacts of Forest Service management decisions on the policymaking of other resource agencies.

Response: The public comment period for the Proposed 2002 Forest Plan and DEIS afforded other resource agencies an opportunity to comment on the proposal on how it would impact them. The Forest considered all comment before making a final decision.

P34 Public Concern: The Forest Service should ensure cooperation with local jurisdictions by using Management Area 7.1 (Intermix) or another formal mechanism and including specific non-motorized designations on lands adjacent to designated Wilderness.

Response: Management area 7.1 may, or may not have motorized use in the area, depending upon where it is applied. Regardless, motorized uses will be limited in the selected alternative to designated routes. Additional information on the application of management area 7.1 can be found in the response to comment P34, and in the FEIS in the Travel Management and Social and Economics topics.

P35 Public Concern: The Forest Service should establish standards and guidelines for Goal 3.4 (public and organizational relations).

Response: Public collaboration and organizational relations are forest goals. Objectives have been added that include some specific action that the Forest may undertake to meet that goal. Goals and objectives were chosen as the method of addressing this issue in the forest plan rather than the use of standards and guidelines because standards and guidelines are more prescriptive, have less flexibility and are aimed more at meeting quantitative measures than collaborative conditions.

P36 Public Concern: The Forest Service should expand the objectives of Goal 3.4 (public and organizational relations).

Response: Goal 5, Public Collaboration and the associated objectives were created and expanded upon what was in the draft based on public comments. See Goal #5 in Chapter 1 of the 2002 Forest Plan for the specific objectives and strategies.

P33 Public Concern: The Forest Service should establish a process to guide collaboration with local governments. –and-

P37 Public Concern: The Forest Service should work closely with local officials and agencies to assure planning consistency within the region.

P37.1 County Officials

P37.2 Municipal officials –and-

P38 Public Concern: The Forest Service should consult with regional land-use planning bodies, both governmental and non-governmental.

P38.1 Planning

P38.2 Implementation

P38.3 Planning and implementation

Response: A recently signed memorandum of understanding between the Northwest Colorado Council of Governments and the White River National Forest may serve as a prototype to establish guidelines for collaboration with local governments. Nevertheless, the Forest Service routinely consults local governments on Forest activities and pending management decisions through formal and informal processes.

Activities on private, state and county properties will be managed according to the proper decision making authority. The Forest Service can, and will participate in multi-

jurisdictional planning activities. Consistency across boundaries, on certain issues, will be a goal when appropriate.

P39 Public Concern: The Forest Service should avoid management area designations that conflict with existing cooperatively developed plans for those areas.

Response: The 2002 Forest Plan did consider existing cooperatively developed plans for specific areas such as Vail Pass. In some instances, however, new policies or directions have been implemented in the Forest Service that the forest plan must comply with. An example is lynx management direction. These new directions must be followed and if they are in conflict with recreation plans for certain areas of the forest, then the site-specific plans will have to be reviewed. The decisions to place management areas on the maps did consider agreements and plans already in place.

In addition, the Travel Management Plan has been separated from the forest plan. When the 2002 Forest Plan is approved, work will begin on the Travel Management Plan. The Travel Management Plan will look at road and trail opportunities across the entire Forest. A part of this work will include review of existing recreation use plans to ensure consistency with the 2002 Forest Plan. Adjustments may, or may not, have to be made.

P40 Public Concern: The Forest Service should clarify potential transit options under Alternative D.

Response: Transit options, for example public transportation systems, are not under the authority of the Forest Service. Public transit options for any community located near the White River National forest are not limited by the decisions made in the forest plan unless the transit system being considered will occur on National Forest System lands. The Forest did not receive any proposals for transit systems on National Forest System lands other than comments on aerial transportation corridors.

P41 Public Concern: The Forest Service should address the need for a multi-jurisdictional collaboration process in regional transit planning.

Response: The White River National Forest will participate in and will cooperate with any regional transit planning proposal that occurs on National Forest System lands. At such a time when the Colorado Intermountain Fixed Guideway Authority gets approval to build a guideway system through Summit or Eagle counties, the White River will participate in the planning effort. The White River is currently working with the Federal Highway Administration in its effort to analyze potential expansion alternatives for Interstate 70. If changes or adjustments need to be made to the Final Forest Plan, the appropriate amendments may be made after analysis and public comments are completed.

P42 Public Concern: The Forest Service should include additional wording in the Management Area 7.1 (Intermix)-"Desired Condition" section to address multi-jurisdictional planning that emphasize cooperative relationships.

Response: Additional wording has been added to the Desired Condition of Management Area 7.1.

P43 Public Concern: The Forest Service should work with other agencies to mitigate the impacts of common problems such as urbanization and highway construction.

Response: The Forest Service will work with other government agencies to mitigate the impacts of urbanization and highway construction. This involvement, and associated actions, will be constrained by the authority that government agencies have, or do not have, over certain activities. Cooperative agreements and other partnership opportunities will be used to address issues of concern between the Forest Service and local governments.

P44 Public Concern: The Forest Service should demonstrate compliance with regulations that direct the agency to review local comprehensive and master plans.

The Final Forest Plan contains direction that requires collaboration with local governments and interested publics. Specifically, Chapter 1 of the Revised Forest Plan contains Goal 5: Public Collaboration. Within this goal, strategy 5a.2 states: "Cooperatively work with local governments to address issues of common concern and to the extent possible maintain consistency with locally adopted master plans."

P45 Public Concern: The Forest Service should identify how the revised White River Forest Plan will be affected by revisions to the planning regulations.

The revised plan for the White River National Forest will be completed under the set of planning regulation published in 1982 (36 CFR 219). These regulations were updated and a revised set of planning regulations was approved and published in the Federal Register on November 9, 2000. These new regulations were intended to replace the old regulations. Forest Plan revisions that were started under the 1982 regulations can be completed under the 1982 regulations (see the transition language in the new regulations at 36 CFR 219.35). The White River Forest Plan will be completed under the 1982 regulations. The final Forest Plan, therefore, will be in compliance with the 1982 regulations and not any new regulations.

P46 Public Concern: The Forest Service should analyze the effects of the Roadless Initiative on White River National Forest management planning.

Response: The final revised plan for the White River National Forest is in compliance with current agency direction regarding roadless area management. The discussion of this policy and the effects it has on forest management is discussed in the FEIS in the roadless area topic and in Appendix C to the FEIS, Roadless Areas.

Specifically, there is one forestwide guideline in Chapter 2 of the Plan that states that when management activities are being considered in roadless areas, the emphasis for these activities should emphasize long-term maintenance of roadless characteristics, and habitat improvement for threatened, endangered and sensitive species; or maintenance and restoration of ecosystem composition and structure, such as reducing the risk of uncharacteristic wildfire effects or threat of insect or disease epidemics. This direction is found in the Administrative Section of Chapter 2 of the 2002 Forest Plan.

The 2002 Forest Plan does not prohibit any activities based on roadless character. The management area prescriptions discuss what activities are, and are not, allowed in each area. Some roadless areas have been assigned management prescriptions that allow road

construction and timber harvest, and some roadless areas have been assigned management prescriptions that prohibit road construction and timber harvest. The direction for how an area is to be managed is determined, therefore, by the prescription, not by whether or not it is roadless.

P47 Public Concern: The Forest Service should prepare a supplemental EIS to analyze the effects of concurrent national initiatives on the White River Forest Plan.

Response: National initiatives that were of concern to the public during the comment period and during the preparation of the final documents include the roadless area conservation policy, the transportation policy, and the listing of the Canada lynx as a Threatened species under the Endangered Species Act. The roadless area conservation policy and the transportation policy are both Forest Service rules that were finalized after the draft of the White River Forest Plan was released to the public. Both of these rules had public comment periods and extensive public comments submitted. The transportation policy is final and will primarily impact the implementation of the 2002 Forest Plan, not the contents of the 2002 Forest Plan. The roadless policy was approved, but is currently being challenged. The Chief of the Forest Service has issued a policy letter due to the uncertain status of the roadless policy, and the 2002 Forest Plan meets the intent of that letter. This is further discussed in the FEIS in the Roadless Topic and in Appendix C.

The Canada lynx was listed as a threatened species under the Endangered Species Act after the draft planning documents were made available to the public. There are several planning efforts and inter-agency agreements underway to address lynx habitat management. One of which is a Region 2 effort to amend all forest plans that need to include lynx habitat management direction. This effort includes the White River National Forest, although instead of amending the 1984 Forest Plan, the White River intends to incorporate lynx habitat management direction into the Final forest plan. This approach to addressing the lynx issue was originally published in the Federal Register on March 28, 2000 (Fed. Reg. Vol. 65, #60, pg. 16369-16373). To further clarify the approach to lynx management direction for the White River National Forest, a second notice was published on June 30, 2000 (Fed. Reg. Vol. 65, #127, pg. 40601-40606.) Public comments were received on this proposal.

Although some of the information discussed above was not contained in the Draft documents, there were public comment opportunities on all of these topics, and therefore it was decided that a supplemental environmental impact statement for the White River Forest Plan was not needed.

Since much of the current lynx habitat management direction came into being after the Proposed Revised Forest Plan was completed, the incorporation of this new information into the FEIS and final Revised Plan can be viewed as bringing the best available information forward. Also, the issue of lynx was present in the DEIS and the DEIS reflected the best available lynx information at that time.

P48 Public Concern: The Forest Service should abide by its multiple use management mandate. –and-

P49 Public Concern: The Forest Service should emphasize that the multiple use mandate requires that all designated uses be compatible with resource protection.

Response: A wide range of alternatives with various levels of outputs and services including timber production, rangeland forage, wildlife habitat, and travel management (roads and trails) were analyzed in the DEIS. Each of the alternatives in the DEIS and in the FEIS meets the intent of the various laws, including multiple use management, under which the national forests are managed. The selected alternative in the FEIS represents what Forest managers believe to be the best balance of outputs and services in achieving sustainable ecosystems and meeting the intent of these laws, as well as in addressing the issues and concerns specific to the management of the White River National Forest that were identified in the public concerns.

P50 Public Concern: The Forest Service should honor pre-FLPMA land use authorizations for the use of facilities.

Response: In the Preface to the 2002 Forest Plan, there is discussion of valid outstanding rights. In addition, special use authorizations are described within the applicable legal framework in the FEIS in the Legal and Administrative Framework section of the Special Use section of the Travel Management Topic. The Forest Service authorizes many special uses, under various laws and regulations. These uses must be executed within the appropriate legal framework, as referenced in the forest plan. Many land uses are permitted through other processes than the forest plan. These uses will continue to be implemented according to applicable direction and policy

P51 Public Concern: The Forest Service should continue under the direction of the current Land and Resource Management Plan. –and-

P52 Public Concern: Due to changed circumstance, the Forest Service should revise the current Land and Resource Management Plan. –and-

P53 Public Concern: The Forest Service should consider that the stated need for revision of the current management plan fails to address significant changes outside forest boundaries that impact the White River National Forest.

Response: Forest plans are required by law (National Forest Management Act) to be evaluated and revised as necessary every 10-15 years. An Analysis of the Management Situation (AMS) was completed by forest managers to initiate the revision process and it was determined that significant changes have occurred since the development of the 1984 Forest Plan which required a plan revision. These changes include growing populations around and within the boundaries of the Forest, and changing demands and expectations of the public relative to the provision of forest products, services, recreational opportunities, as well as the need to address a variety of other evolving forest management issues. Each of the alternatives addressed these needs and desires differently. Alternative B represented the continuation of management practices under the 1984 plan and was given equal consideration in addressing the changing management situation. The preferred alternative represented what Forest managers believed to be the

best balance of outputs, services, and management practices in meeting current and evolving human and natural resource needs and desires.

P54 Public Concern: The White River National Forest should include urbanization as a revision topic. –and–

P55 Public Concern: The White River National Forest should not include urbanization as a revision topic.

Response: Urbanization is an important issue for management of the White River National Forest. Urbanization is addressed in the Social and Economic section of the FEIS.

Urbanization was identified as a revision topic in the early stages of the revision process. As the revision progress progressed, the decision to have urbanization as a topic was carefully reviewed. Revision topics drive alternatives. Alternatives differ in how they address each revision topic. Revision topics, therefore, are things that the Forest Service can control directly, such as the amount of recreation opportunities, the number of road and trail miles managed for specific uses, and the number of acres of recommended wilderness. Although Forest Service activities affect local communities, the Forest Service does not have direct control over these developments (impacts). Urbanization does not occur on National Forest Systems lands. It occurs on private lands where other government entities make management decisions. It is not in the direct control of the Forest Service, and therefore was not included as a revision topic.

The impact of land management activities on local communities was fully addressed in the DEIS and is expanded in the FEIS. Such issues as population growth, employment, affordable housing are addressed within the urbanization discussion in the Social and Economic section of Chapter 3 of the FEIS. Urbanization is address addressed specifically in the Social and Economics Topic, Economics subheading, and Urbanization heading.

P56 Public Concern: The Forest Service should change the forest plan on a site-specific basis, rather than a forest-wide scale. -and-

P57 Public Concern: The Forest Service should develop individual district plans. -and-

P58 Public Concern: The revised Land and Resource Management Plan should include the flexibility to be amended on a regular basis. -and-

P59 Public Concern: The Forest Service should undertake a separate programmatic EIS to address the cumulative effects of ski area development. –and-

P60 Public Concern: The Forest Service should clarify the administrative scale of management area category allocations.

Response: The National Forest Management Act requires that forest plans be developed on a broad-scale basis in order that the cumulative impacts of land allocation decisions, forest outputs, and management practices and outcomes can be displayed at a landscape level. It is recognized that the impacts of individual site-specific actions cannot be adequately addressed in such a broad-scale planning effort. Such site-specific projects are

required to be evaluated individually by the National Environmental Policy Act and their localized and cumulative effects identified relative to the management goals and direction contained in the forest plan. Forest plans are amended regularly over time to address emerging issues or as new information becomes available. These amendments typically address minor changes to land allocations and can change forest-wide management standards and guidelines reflecting new information. The changing management situation on the White River National Forest is of such magnitude and scale relative to the 1984 Forest Plan that a plan revision is justified rather than a series of more narrowly focused plan amendments.

P61 Public Concern: The Forest Service should select an alternative that prioritizes ecological integrity and habitat protection. -and-

P62 Public Concern: The Forest Service should err on the side of greater habitat preservation in drafting the final forest plan. -and-

P63 Public Concern: The Forest Service should adopt a plan that emphasizes ecosystem protection. -and-

P64 Public Concern: The Forest Service should choose a plan that balances use with the protection of natural resources.

Response: One of the greatest challenges in developing a forest plan is achieving a balance of management actions and desired outcomes which is responsive to the many varied and oftentimes conflicting public demands. Each alternative represents a different balance of outcomes among sustainable ecosystems, recreational uses, and forest products. The selected alternative is most responsive to the balance between desired public outcomes for the White River National Forest and is consistent with the various laws governing the management of national forests.

P65 Public Concern: The Forest Service should adopt a plan that is comprehensive in nature, with a broad focus on its regional and national implications.

The Forest Service is directed under the National Forest Management Act to develop forest plans for each forest on a recurring schedule. These plans are necessarily unique to each national forest based upon public issues and concerns, the management situation, and the natural resources particular to each forest.

P65 (P65.1 and P65.2) Public Concern: The Forest Service should enhance recreational opportunities in order to accommodate increased use.

Response: The range of alternatives contains varying levels of motorized and mechanized recreational use and the recreation opportunities and effects of each alternative have been displayed in the analysis. The rationale for the selected alternative is presented in the Record of Decision.

Recreational opportunities are expected to expand under the 2002 Forest Plan over the next ten to fifteen years due to expanding population. The rate at which specific recreation opportunities expand will depend upon a variety of factors including the ability and rate at which for developed and permitted recreation opportunities can expand also.

P66 Public Concern: The Forest Service should adopt a plan that is flexible.

The Forest Service is directed under the National Forest Management Act to develop forest plans for each forest on a recurring schedule not to exceed fifteen years. Approved plans are periodically amended during each planning cycle to reflect changing conditions or new information. Most projects undertaken to implement the forest plan are developed by resource managers on the individual Districts, such projects must be consistent with the direction contained with the forest plan.

The 2002 Forest Plan will be monitored every year. Annual monitoring and evaluation reports will be completed. The results of these reports will be adjustments to the Plan to make sure that it is addressing current issues. The Plan will be a dynamic document being continuously reviewed and updated to reflect changed conditions.

P67 Public Concern: The management prescriptions in the Land and Resource Management Plan should be simplified.

Response: The 2002 Forest Plan is written to best of our ability. The Forest Plan addresses complicated issues. These issues were presented as clearly as possible.

P68 Public Concern: The Forest Plan objectives should be realistic and achievable.

Response: The strategies (Chapter 1 of the 2002 Forest Plan) are meant to identify measurable ways of meeting a desired condition in the future. Progress towards the goals and objectives will be made, but will be constrained by budget allocations. Progress will be monitored and evaluated annually.

P69 Public Concern: The Forest Service should modify Goal 2.1 to include partnership development with user groups.

Response: The development of partnerships is critical to the accomplishment of forest goals. The Forest has relied heavily upon partnerships in all of our resource areas and will continue to do so. Forestwide Goal #5, Public collaboration, states that it is the intention of the Forest to work cooperatively with individuals, groups, governments and tribes to achieve a variety of objectives. This direction is found in Chapter 1, Goal #5 of the 2002 Forest Plan.

P70 Public Concern: The final White River Forest Plan should include definable and measurable standards and guidelines.

Response: A standard is defined (page 2-1 of the 2002 Forest Plan) as “a course of action that must be followed, or a level of attainment that must be reached to achieve forest goals.” Standards can either be quantified (measured with numbers) or it must be clearly determined and documented that that a course of action was followed. The standards in the 2002 Forest Plan were written within this framework.

P71 Public Concern: The Forest Service should revise the directive governing the resolution of conflicting standards and guidelines for management areas.

Response: The Forestwide Standard and Guidelines are written to provide resource management direction to all lands regardless of the management area prescription. These Standards and Guidelines (Chapter 2 of the 2002 Forest Plan) cannot and will not be suspended if they conflict with any of the Management Area direction (Chapter 3 of the 2002 Forest Plan). Management Area direction is in addition to the forestwide direction.

The statement remains, "when forestwide standards and guidelines conflict with management area standard and guidelines, those that are more stringent or restrictive are applied" (found in the 2002 Forest Plan).

P72 Public Concern: The Forest Service should delete the second sentence of the Management Area 5.41 Desired Condition discussion.

Response: Management area 5.41 emphasizes deer and elk winter range. The second sentence of the desired condition reads: "Activities may include burning, rangeland management, timber harvest, habitat manipulation, recreation, minerals exploration and development, and road management." These activities are appropriate uses of National Forest System lands. The type of activity and amount of activity for this management area will have to support the theme, management area description and desired condition for these deer and elk winter range areas. Not all activities will occur in all areas, and intensity and frequency will vary also.

Implementation and Monitoring

Enforcement

P73 Public Concern: The Forest Service should select a management plan that will be enforceable.

Response: Law enforcement budget and staffing levels do not dictate the decisions made in Forest Plans. The decisions made in Forest Plans do not drive law enforcement allocations either. Law enforcement resources are allocated separately from the forest planning process according to existing statues, regulations and Forest Service policy (FSM 5302 and FSH 5309.11 and others).

There are other means than law enforcement to implement forest plans. Making sure people are aware of the rules through signing and mapping is a key step. Educational activities are also helpful. Many volunteer groups or user groups monitor their own behavior and that of others who do similar activities. Partnerships also provide means to communicate the proper way to use the forest and share information.

P74 Public Concern: The White River National Forest should institute a toll-free hotline number so that forest users can report violations.

Response: Implementation activities, such as a method for reporting violations, will come after the forest plan revision is complete. Congressman McInnis offered the solution of a toll-free hotline. The idea is to have greater involvement of the user public in the enforcement of forest regulations. Forest staff will discuss this with him, including funding of this effort, which is a concern of some citizens, after the forest plan is finished.

P75 Public Concern: The Forest Service should actively enforce the ski industry's compliance with federal environmental laws.

Response: Ski areas are subject to the same Forest Plan Standards and Guidelines (2002 Forest Plan Chapters 2 and 3) and other legal requirements as other forest users. The White River is responsible for ensuring that activities that occur on National Forest System lands comply with all applicable Forest Plan guidance and legal requirements. The Forest Service is not the agency responsible for ensuring legal compliance for activities that occur on private or other lands.

Monitoring

P76 Public Concern: The Forest Service should monitor activities at frequent intervals and in a meaningful manner. -and-

P77 Public Concern: The final Forest Plan should include strengthened monitoring requirements to provide more definitive information. -and-

P78 Public Concern: The Forest Service should invest more resources into surveying and monitoring for adaptive management. -and-

P81 Public Concern: The Forest Service should add a monitoring question in Table 4-2 to evaluate collaborative efforts.

Response: The monitoring strategy in the DEIS has been significantly revised in the FIES to address public concerns. This revision was done to make the monitoring strategy more clearly understood, to identify specific items to be monitored and how often, to suggest meaningful monitoring methods, and to address all legal obligations. See Chapter 4 of the 2002 Forest Plan for this revised monitoring strategy.

Monitoring of wildlife species, specifically proposed, Threatened, Endangered, and Sensitive species is addressed in this strategy. The purpose of this section is to outline the methods to survey and monitor these species to ensure viability.

Public collaboration, and working with local governments is now more clearly included in the monitoring strategy. Table 4-1 of the 2002 Forest Plan includes monitoring questions that responds to concerns that the White River not only work with local governments more closely, but monitor the effectiveness of these collaborative efforts.

P79 Public Concern: The White River National Forest should assure that monitoring data collected by volunteers is actually compiled and used in management decisions.

Response: The monitoring chapter (2002 Forest Plan Chapter 4) identifies those situations in which partners or volunteers may provide monitoring data. If so, the data provided by such groups may be the only data available and will be used in the monitoring of the forest plan. Any data gathering exercise needs to be coordinated between volunteers or other groups and the White River National Forest to make sure the data is presented in ways that are compatible with other monitoring efforts or existing data.

P80 Public Concern: The White River National Forest should follow through on monitoring goals 2.2, 2.9a and b.

Response: The goals and objectives in the proposed revised Forest Plan were rewritten to include more recent information (2002 Forest Plan Chapter 1). Goal #2, Multiple Benefits to People, contains Objective 2b; “Improve the capability of wilderness and protected areas to sustain a desired range of benefits and values. There are several corresponding strategies intended to help meet the intent of the goal and objective. The Forest intends to implement the plan to meet all goals, objectives, and strategies.

P82 Public Concern: The Forest Service should consider assessing some of the results from the implementation of the forest plan over longer time periods.

Response: The monitoring chapter (2002 Forest Plan Chapter 4) includes information on how often each item will be monitored, and how often the results will be reported (Table 4-1, Monitoring Strategy). In many instances several years of observations are needed before a trend or conclusion can be reached. Each monitoring item will be monitored on a schedule that will best provide the information needed.

P83 Public Concern: The Forest Service should make monitoring results available to the public for review.

Response: Monitoring reports are available to the public upon request. Monitoring reports will be available in the future on the Internet.

Funding for Implementation

P84 Public Concern: The White River National Forest should obtain adequate funding to assure effective forest management.

Response: Funding for the White River National Forest is part of an overall funding allocation determined by Congress and the Administration. The White River must work within the budget it is allocated. The Forest, however, does make requests for funding based on projected accomplishments in the forest plan. The Forest Plan, therefore, must clearly identify the goals and objectives it wishes to meet. The Forest identifies, in the forest plan, the goals and objectives guiding future management, and the accomplishment towards these goals with current funding. The forest also determined what could be accomplished if funding for the White River was increased. These results are shown in Supplement Table 3, in Chapter 2 of the FEIS.

Volunteers, partnerships and collaborative agreements are used by the White River to meet some of the goals and objectives. This will continue in the future.

P85 Public Concern: The Forest Service should draft the forest budget to more closely reflect Forest Plan objectives.

Response: It is the intent of the White River National Forest to use the forest plan to identify priority activities during the annual budget allocation process.

P86 Public Concern: The Forest Service should allocate district forest budgets based on public usage rather than on commodity extraction levels.

Response: District budgets are allocated based on the program of work to be accomplished, not whether or not they have commodity extraction occurring. The level of funding Districts receive is not part of the forest plan decision.

P87 Public Concern: The White River National Forest should divert its planning budget to roads and trail maintenance and education.

Response: The National Forest Management Act regulations require that plans be revised every 10-15 years. It was necessary, therefore to incur an expense at this time to revise the forest plan.

P88 Public Concern: The Forest Service should consider returning 80% of revenues collected with the White River National Forest to back to it.

Response: The fees collection and redistribution process is not decided by the White River National Forest and is not a decision made in Forest Plans. Any changes to fee collection and revenue distribution policy will be implemented as appropriate.

Staffing for Implementation

P89 Public Concern: The White River National Forest should reduce administrative staffing levels and better manage its budget and resources. -and-

P90 Public Concern: The Forest Service should select an alternative that can be implemented with the lowest staffing levels.

Response: The preferred and selected alternatives were not chosen based on staffing levels. It is not appropriate to base forest plan decisions on staffing levels. Staffing levels will, however, determine the progress that can be made toward goals and objectives identified in forest plans.

Other Issues of Concern

P91 Public Concern: The Forest Service should consider that reductions in domestic timber harvest will shift timber harvest impacts to other countries.

Response: Analysis of timber supply and demand for the White River National Forest is limited to the local timbershed area, and area defined by local lumber mill processing capabilities and local timber demand. The White River National Forest is considered a small timber supplier that has no influence on national or international timber markets. This finding is found in "A Market Analysis of the Analysis of the Timber Situation of the White River National Forest", Administrative Study, April 1997. Therefore, the analysis of global timber demand is not appropriate during this Forest Plan revision.

P92 Public Concern: The White River National Forest should select Alternative I in order to help mitigate global climate change.

Response: Analysis of global climate change is not appropriate during Forest Plan revision. Most Forest Plan analysis is done at a smaller scale, addressing the lands managed by the White River National Forest plus examining effects on other adjacent lands determined by specific issues.

Decision-Making and Public Influence

P93 Public Concern: The Forest Service should include specialists not represented on the existing planning team.

Response: Chapter 4 of the FEIS lists those specialists who contributed to the plan. This list has been added to and changed for the FEIS. Some individuals participated in the draft documents and were simply overlooked in the DEIS. Representation on the IDT changed between draft and final due to personnel changes. In addition to staff turn-over, specialists added to the FEIS list include an archeologist, botanist, and economist.

P95 Public Concern: The White River National Forest should review the DEIS for bias resulting from possible conflicts of interest.

Response: The FEIS was carefully reviewed to ensure that it presents information in a straightforward manner. Several individuals, including those who are, and are not, technical experts in particular topics, reviewed all sections of the FEIS.

P96 Public Concern: The White River National Forest should make decision-making criteria, assumptions and methodology readily available to the public.

Response: The Record of Decision (ROD) presents the process used to identify the selected alternative. The decision making process used is called "Choosing by Advantages." The process and specific information used in the process are discussed in the ROD.

In addition, the processes used to address species viability, and how decisions were made to identify species of viability concern, are found in the FEIS in the Biodiversity Topic. Additional information and detailed reports on species viability procedures is found in the administrative record and is available upon request.

Use of Information in the Decision Process

P101 Public Concern: The White River National Forest should take into account that the original Colorado DNR staff recommendations were modified by political appointees of that organization before submitting the comments to the Forest Service.

Response: All comments that were received were treated similarly. All comments were entered into the content analysis process, a process that examined each letter and extracted and consolidated comments. Please see the introduction to this appendix for a summary of the content analysis process. Therefore, all comments from the Colorado DNR were examined in the process, regardless of who submitted them.

P103 Public Concern: The Forest Service should incorporate public comment into plan revisions.

Response: Public comment received on the draft Forest Plan for the White River National Forest was taken very seriously. All comments were entered into the content analysis process described in the introduction to this appendix. Many comments resulted in additional work, clarification, and review of specific issues in the draft documents. Not all public comments can be incorporated into the final documents; however, because many comments were made on items that are not forest plan decisions. These comments were reviewed and considered, however, and specific responses, including responses that state that comments are not applicable to the forest plan, should be found in this appendix organized by resource topic.

Public Involvement and Collaboration

COMMENT PERIOD

PUBLIC INVOLVEMENT EFFORTS

P97 Public Concern: The White River National Forest should use social science tools to identify and analyze public opinion.

Response: Social science tools were used to determine public attitudes, values and beliefs. This information was introduced in the DEIS. The FEIS contains additional information and more details regarding social science issues and how they relate to forest management. This information is found in the FEIS in the Social and Economic section of Chapter 3.

ACCESSIBILITY OF INFORMATION FOR THE PUBLIC

PUBLIC EDUCATION

P105 Public Concern: The White River National Forest should develop an outreach program to teach environmental programs to local school children and residents.

Response: The White River National Forest does have an environmental education program that reaches out to schoolchildren. Staff from the Forest participates with school groups in many ways. This is an important issue to local communities and schools. Environmental education programs, however, are not decisions made with forest plans. These programs may serve as tools to help implement the forest plan, however, through community education and the sharing of information.

P106 Public Concern: The White River National Forest should adapt to changing population demographics in Colorado by providing educational outreach in Spanish.

Response: The White River National Forest has made specific efforts to reach the Latino community. One of our newsletters was produced in English and in Spanish. The Spanish language version did not generate a great deal of feedback. Regardless, all user groups are valued and need to be reached in ways that are accessible to them. Forest staff will work with any group that requests a different or new means of communication.

The Forest intends to produce a newspaper insert as part of the strategy to convey information to the public when the 2002 Forest Plan is completed. One section of this newspaper insert will be in Spanish in an attempt to share information with the Spanish-speaking community.

STAKEHOLDER INVOLVEMENT

P108 Public Concern: The White River National Forest should make an effort to identify and inform stakeholders in order to effectively manage cross-boundary issues.

Response: The White River made many efforts to not only identify stakeholders, but to involve them in the forest planning process. Public involvement efforts included newsletters, newspaper articles, open house meetings, magazine articles, and radio

interviews. In addition, work groups were held before the Draft documents were released. The purpose of the work groups was to identify issues and potential ways of addressing the issues. These outreach efforts were aimed at all interested parties, which includes those interested in cross-boundary issues.

Cross-boundary issues can also be addressed through multi-government planning efforts, collaborative actions, and partnership agreements. All of these tools are available to Forest Service staff and will be used in activities that implement the forest plan.

See P9 and P22.

PUBLIC PARTNERSHIPS AND COLLABORATION

P111 Public Concern: The Forest Service should develop a formal collaborative planning process to evaluate future ski area expansion proposals and include this process in the final Forest Plan.

Response: The Forest is currently working on a collaborative process with local governments in Summit County. The expectation is that this experience will help us develop other collaborative planning strategies that can be used in the future for a variety of issues and projects. The forest plan, in and of itself, will not contain a standard collaborative planning process. It does, however, contain more goals and objectives that will help us achieve collaborative planning. These goals and objectives are found in Goal #4 in Chapter 1 of the 2002 Forest Plan.

See also P33, 37, and 38.

INTERAGENCY COLLABORATION, FEDERAL

P112 Public Concern: The Forest Service should consider the development of interagency agreements to share responsibility for implementing mutually beneficial management activities.

Response: The Forest Plan advocates cooperative agreements between agencies, governments, permittees and user groups. These agreements will address many issues including noxious weeds and road maintenance. The Forest Plan does not, however, provide the details for any such agreement. Individual agreements will have to meet the intent of all applicable direction found in a variety of laws, regulations and policies.

Interagency Collaboration, County and Local

INTERAGENCY COLLABORATION, COUNTY AND LOCAL GOALS, STANDARDS, AND GUIDELINES

P114 Public Concern: The Forest Service should modify Goal 3, Public Organizational Relations.

Response: Several comments were received on Goal 3 of the Proposed 2002 Forest Plan. Many of them included specific proposals for rewording objectives, adding objectives, or adding standards or guidelines. Upon review of this information, the 2002 Forest Plan includes Goal #5 – Public Collaboration and several objectives and strategies for meeting that goal. These strategies address, among other issues, the issue of project consistency with county master plans and the issue of providing opportunities for local governments to participate in planning efforts and monitoring efforts. See P35.

INTERAGENCY COLLABORATION, MULTI-JURISDICTIONAL

P117 Public Concern: The Forest Service should develop a collaboration process to develop joint management prescriptions and monitoring of intermix areas.

Response: Management prescriptions in the 2002 Forest Plan apply only to National Forest System lands. The Forest, however, is willing to participate in urban intermix activities that cover lands of several jurisdictions. Issue identification, planning objectives, and monitoring activities are all items that can be addressed through inter-agency cooperation. The Forest Plan recognizes the need for such activities in the 2002 Forest Plan Chapter 1, Goal #5 – Public Collaboration.

Relationship of the White River Forest Plan Revisions to other Planning and Rulemaking Processes

P118 Public Concern: The White River National Forest should ensure that the final Forest Plan is as consistent as possible with proposed planning regulation revisions in order to avoid another round of plan revisions. -and-

P119 Public Concern: The White River National Forest should re-release the final Forest Plan for public comment if it is significantly revised due to new planning regulations.

The Revised Forest Plan was completed under the 1982 Planning Regulations – the same regulations that were used throughout the entire planning process. The changes between draft and final were not a result of changes in planning regulations as the regulations that White River planning process used did not change. A re-release was therefore not necessary. See also P45.

P120 Public Concern: The Forest Service should develop a review process to ensure timely adjustment of its policies to conform with new regulations of other agencies.

Response: If other agencies (e.g. Environmental Protection Agency) approve new regulations that directly impact Forest Service activities, the forest plan will be reviewed and adjustments made to it if necessary and appropriate. Forest Plan amendments are done to adjust the plan based on changed conditions, new information, or new law, policy or direction. Forest plan amendments will be made to reflect new policy, if needed, regardless of the issuing agency.

P121 Public Concern: The White River National Forest should update the Rangeland Renewable Resources Assessment and incorporate the recommended outputs into the final Forest Plan.

The Forest and Rangeland Renewable Resources Planning Act (RPA) of 1974 states that

> "[T]he Secretary of Agriculture shall prepare a Renewable Resource Assessment (hereinafter called the "Assessment"). The Assessment shall be prepared not later than December 31, 1975, and shall be updated during 1979 and each tenth year thereafter . . .." [Section 3.]
>
> "In order to provide for periodic review of programs for the National Forest System, for research, for cooperative State and private Forest Service programs, and for conduct of other Forest Service activities in relation to the findings of the

> Assessment, the Secretary of Agriculture, utilizing information available to the Forest Service and other agencies within the Department of Agriculture . . . shall prepare and transmit to the President a recommended Renewable Resource Program." [Section 4.]

The USDA Forest Service has been engaged in developing national renewable resource assessments and in long-term strategic planning since 1974 when the Forest and Rangeland Renewable Resources Planning Act (RPA) was enacted. With the passage of the Government Performance and Results Act of 1993, which required all CFO agencies to prepare strategic plans, the development of Agency strategic plans has been done based on the requirements of both laws. A Forest Service Strategic Plan was completed in 1997 and revised in 2000. The most recent updates of the RPA Assessment were completed in 1993 and 2000. The last RPA Recommended Program was completed in 1990.

A Draft 1995 RPA Program ("The Forest Service Program for Forest and Rangeland Resources: A Long-Term Strategic Plan") was published in October 1995. The Draft 1995 Program, along with the RPA Assessment, other information and analyses, and public comment were used as the basis for preparing the "USDA Forest Service (GPRA) Strategic Plan" published in 1997.

At the end of Fiscal Year 1997, out of concern that the requirements for a RPA Program and a GPRA strategic plan were duplicative, language was inserted in the Department of Interior and Related Agency Appropriations Act for Fiscal Year 1998 that stated:

> "No part of any appropriation . . . shall be expended or obligated to complete and issue the five-year program under the Forest and Rangeland Renewable Resources Planning Act." [Excerpt from Public Law 105-83, November 14, 1997]

The Fiscal Year 1999 appropriations bill continued this language and, in the appropriations bill Conference Report, further clarified that

> "The Committees recognize that the Government Performance and Results Act requires strategic plans and performance measures which should provide the public with sufficient information formerly provided in the RPA Program." [Excerpt from the October 1998 Conference Report]

The Department of Interior and Related Agency Appropriations Act, 2001 (Public Law 106-321), repeated the language of prior year appropriations acts. No further clarifying language about RPA requirements vis-à-vis GPRA was added.

In October 2000, the current "USDA Forest Service Strategic Plan (2000 Revision)" was published. Preliminary findings of the 2000 RPA Assessment were an integral part of the 2000 Revision. The summary report for this latest update of the Assessment, titled, "The 2000 RPA Assessment of Forest and Range Lands," was published in February 2001.

The RPA Assessment has been updated as required by law. A Forest Service Strategic Plan, in lieu of a RPA Program, was completed in 2000 in accordance with GPRA and language in the Interior and Related Agencies Appropriations Act. Neither the RPA Assessment nor the Forest Service Strategic Plan contains recommended output targets applicable to individual National Forests. The Assessment contains national and regional level analysis of the renewable resource situation, including long-run projections of supply and demand for the various renewable resources. The Strategic Plan contains

goals, outcomes, performance measures, and strategies that apply to all Agency programs, including management of the National Forest System; but the Strategic Plan does not establish output targets. While Forest plans should be consistent with the guidance provided in the Strategic Plan and should consider the information provided by the RPA Assessment along with other available and relevant science, neither the Strategic Plan nor the Assessment contain recommended outputs that must be incorporated in Forest plans.

P123 Public Concern: The Forest Service should prepare and circulate for comment a revised DEIS that incorporates lynx management information and strategies.

Response: Since much of the current lynx habitat management direction came into being after the Proposed Revised Forest Plan was completed, the incorporation of this new information into the FEIS and final Revised Plan can be viewed as bringing the best available information forward. Also, the issue of lynx was present in the DEIS and the DEIS reflected the best available lynx information at that time.

See P47 for more information.

Legal and Administrative Framework

P124 Public Concern: The DEIS should include a complete quantitative cumulative effects analysis of all affected resources as mandated by NEPA.

Response: Cumulative effects section found in the DEIS were reviewed and supplemented in the FEIS.

P125 Public Concern: The Forest Service should complete a Regulatory Flexibility Act analysis for the forest plan revision.

Response: Regulatory Flexibility analysis is a requirement of rule making. Forest Plans are not considered to be rules and are therefore not subject to the Regulatory Flexibility Act analysis. A regulatory flexibility analysis is not required and was not completed.

PURPOSE, NEED AND SIGNIFICANT ISSUES

Purpose and Need

Need to Change the forest plan

P126 Public Concern: The White River National Forest should avoid a "tragedy of the commons" situation caused by the cumulative effects of multiple forest uses.

Response: A wide range of alternatives with various levels of outputs and services including timber production, rangeland forage, wildlife habitat, and travel management (roads and trails) were analyzed in the DEIS. Each of the alternatives in the DEIS and in the FEIS meets the intent of the various laws, including multiple use management, under which the national forests are managed. The selected alternative in the FEIS represents what Forest managers believe to be the best balance of outputs and services in achieving sustainable ecosystems and meeting the intent of these laws, as well as in addressing the issues and concerns specific to the management of the White River National Forest that were identified in the public concerns.

When the forest plan is completed, individual areas will be examined to determine if recreational use levels are appropriate. Tools for doing such analysis, and for managing use levels, are discussed in the FEIS, Chapter 3, in the Recreation Topic.

Revision Topics

Decisions Made in Forest Planning

Scale of Decision

P127 Public Concern: The Forest Service should conduct site-specific environmental analyses for the two project-specific decisions tiered to the forest plan revision process.

Response: The DEIS identified two specific decisions that were going to be made with the forest plan decision. These two decisions were: (1) the Travel Management Plan, and (2) management of vacant grazing allotments.

A decision has been made to separate the Travel Management Plan from the forest plan. Analysis for the Travel Management Plan, therefore, will be initiated after the forest plan is complete. This analysis will be made available to the public, and public involvement activities will occur, as part of the NEPA process.

Management of vacant allotments will be decided with the forest plan. The analysis to support this decision can be found in the FEIS, Chapter 3, Grazing. The decisions regarding management of vacant allotments can be found in the Record of Decision for the forest plan.

P128 Public Concern: The Forest Service should base project-level decisions on site-specific analysis.

Response: The Forest Service does, and will continue to, base project-level decision on site-specific analysis. Decisions such as timber sales and ski area expansions will be made after site-specific NEPA documents are completed and decision made. The analysis in the forest plan is done at a programmatic scale and is meant to predict potential outputs at the forest scale. The Forest Plan analysis does not approve individual timber sales or ski area expansions.

General Management Direction

P131 Public Concern: The final Plan should closely reflect ecosystem management principles rather than traditional output goals emphasized in the DEIS.

Response: The DEIS and the FEIS were constructed using ecosystem management principles. The FEIS, like the DEIS was constructed according to the planning regulations at 36CFR 219 that requires specific resource analysis. The FEIS was not intended to be solely commodity driven, however, all requirements had to be met. The Forest Plan is a multiple use document with consideration given to ecosystem principles as well as resource production.

Management Prescriptions

P134 Public Concern: The Forest Service should use overlapping management prescriptions to meet complex resource goals.

Response: Prescriptions are intended to identify emphasis areas. In many cases prescriptions allow for many uses of the forest, in addition to the emphasis identified in the prescription description. The description of each management area (Chapter 3 of the 2002 Forest Plan) identifies what activities are likely to occur in that area.

In some instances two or more management prescriptions overlap on the same area. The goal was to keep overlapping management areas to a minimum. Having more than one management area in one location can complicate management. In certain areas multiple management areas were used to identify that there are many values in an area. Multiple management areas primarily occur in areas where there is the opportunity for more than one special designation: wilderness and research natural areas, wilderness and wild, scenic or recreation rivers, proposed wilderness and research natural areas, etc. See the map packet for other instances of overlapping management areas.

P135 Public Concern: The Forest Service should ensure that management allocations in the final Forest Plan and the Travel Management Plan are consistent.

Response: A decision was made to separate the Travel Management Plan from the 2002 Forest Plan. The Travel Management Plan will start after the forest plan is completed. The Travel Management Plan will have to be in compliance with direction contained in the forest plan (Chapter 2 Standards and Guidelines, and Chapter 3, Management Area direction). Inconsistencies between the Travel Management Plan and the 2002 Forest Plan may be addressed through amendments (changes) to the 2002 Forest Plan.

The 2002 Forest Plan is in large part consistent with the current travel opportunities on the Forest. There were a few changes that needed to be made to summer travel in order to make current road and trail use compatible with the management areas in the 2002 Forest Plan. The individual road and trail changes are listed in the Record of Decision for the 2002 Forest Plan.

P136 Public Concern: The Forest Service should create an Intermix prescription that restricts off-trail and winter motorized use.

Response: The 2002 Forest Plan has a forestwide standard that restricts summer motorized and mechanized use to designated roads and trails (Forest Plan Chapter 2, Infrastructure Standard #4). Winter motorized use is allowed in 7.1 areas according to the management area direction (Forest Plan Chapter 3, 7.1 Intermix). The Travel Management Plan, to be started after the forest plan, will examine each area where motorized travel is allowed to determine if it is appropriate. At that time specific winter motorized use in 7.1 areas will be determined.

Goals and Objectives

P137 Public Concern: The White River National Forest should resolve the numerous internal inconsistencies between the basic elements of the draft Land and Resource Management Plan.

Response: The FEIS and 2002 Forest Plan were reviewed extensively to ensure consistency across the documents. There is a large amount of information presented in these documents and it can be confusing. Forest staff are available to answer questions and help interpret any of the contents of the final set of documents.

P139 Public Concern: The White River National Forest should correct inadequate achievement goals found in many forestwide objectives.

Response: The point of identifying forestwide objectives and strategies is to describe the types of activities or conditions that need to be attained to reach agency goals. Achievement of any strategy or objective is partially based on the staffing and budget resources available to the White River National Forest. Achievement levels in the draft and final documents were estimated using realistic budget estimates. Using budget constraints in achievement estimates help predict a realistic outcome.

P140 Public Concern: The Forest Service should explain and include specific "Meaningful Measures" mentioned in Goal 2.9b in subsequent planning documents.

Response: The term "Meaningful Measures" is defined in the Glossary, Appendix J of the FEIS.

P138 Public Concern: The White River National Forest should consider development of a new set of interrelated objectives during the revision process.

Response: It was recommended that the 2002 Forest Plan contain the following set of objectives: collaborative planning processes with local government, stewardship capacity building programs, community socio-economic sustainability objectives, urbanization processes and boundary-less ecosystem management objectives, and the generation of sufficient revenues to achieve desired conditions. While these are recognized as respectable objectives, they are generally outside of the authority of the White River National Forest and not within the forest-planning framework. Some of these ideas, however, are addressed in a more simple fashion in the 2002 Forest Plan. See 2002 Forest Plan Chapter 1 for examples of public collaboration objectives and other goals appropriate for Forest Plans.

Standards and Guidelines

P141 Public Concern: The White River National Forest should ensure that all prescriptions include standards.

Response: Standards and guidelines are found in two places in the Plan – Chapter 2, Forestwide Standards and Guidelines, and Chapter 3, Management Area Descriptions. These two chapters work together. Forestwide standards apply to all areas of the White River National Forest, regardless of management area. Any direction found in management areas (standards and/or guidelines) is in addition to the forestwide standards. There is no requirement to have standards in management areas. Management area direction is meant to complement, and add to, the forestwide direction.

There is a concern that the Forestwide Standards and Guidelines in Chapter 2 in the Draft of the Plan did not adequately address species viability. Species viability was analyzed in a new way for the 2002 Forest Plan. A description of the species viability process can be found in Chapter 3 of the FEIS, the Biodiversity Topic, wildlife section. The standards and guidelines that resulted from this new analysis can be found in the 2002 Forest Plan, Chapter 2 Standards and Guidelines, Section 2 Biological, headings: Species of Viability Concern Aquatic, Species of Viability Concern Plant, and Species of Viability Concern, Terrestrial.

P142 Public Concern: The final Plan should include a provision to allow deviation from forestwide guidelines if site-specific vegetation management plans are in place.

Response: Vegetation management plans are currently requirements of ski area special use permits. This will not change. The Forestwide standards and guidelines for vegetation management will apply to these vegetation management plans. The programmatic direction (forestwide standards and guidelines) should complement and guide the site-specific vegetation management plans.

Implementation and Monitoring

Enforcement

P143 Public Concern: The Forest Service should undertake strong and consistent enforcement to reduce future conflicts over use.

Response: Enforcement of the 2002 Forest Plan will be the result of several activities, one of which is Forest Service law enforcement. Other opportunities for ensuring that restrictions are followed include increasing public awareness through maps and signs, public education of why restrictions are needed, and working with a variety of groups that use public lands to increase group monitoring.

Law enforcement is guided by many existing statues and regulation and policy (FSM 5300 and FSH 5309.11). Law enforcement direction and funding are not decision made in the forest plan.

Monitoring

P145 Public Concern: The Forest Service should develop a stronger monitoring program to assess management impacts and forest conditions during the lifetime of the final Plan.

Response: The monitoring strategy is found in Chapter 4 of the 2002 Forest Plan. The monitoring strategy was revised for the 2002 Forest Plan. One aspect of the revised strategy is to create a Monitoring Guide with additional information on data, costs, frequency, protocols, risk, and other aspects of monitoring tasks. Because this information may change over the life of the plan (e.g. protocol may evolve, databases may change, etc.) it was decided that this detail should not be part of the forest plan, rather, it should be in the Monitoring guide, where it can be continuously updated and modified. This Guide will be created after the forest plan is approved and will be used to create an Annual Monitoring Plan each year. For a description of the Monitoring Guide, see 2002 Forest Plan, Chapter 4 Monitoring and Evaluation, Monitoring Guide heading.

The level of monitoring activity achieved in any year is constrained by budget allocation. Opportunities to collect monitoring data by partnerships, permittees, user groups or other interested parties will be considered and part of the strategy.

The monitoring strategy presented in the 2002 Forest Plan (Chapter 4) is the product of a national Forest Service team convened to create a strategy to be used in many Forest Plan revisions. Several components of the strategy are new.

Monitoring reports are still required every year. There appears to be a concern that some monitoring items are only reported every 5 years. In some instances a condition or accomplishment may only be monitored once every 5 years. In other instances though, annual monitoring will need to be done to create a report, once every 5 years, showing trend data. Some monitoring will be done every year using the resources available.

Species of viability concern are a component of the monitoring strategy in the 2002 Forest Plan. Specifics, however, will be found in the Monitoring Guide, the Annual Monitoring Work Plan and the Annual Monitoring Report.

P146 Public Concern: The final plan should include measurable outcomes and budgetary consideration for all forestwide objectives.

Response: Objectives, as described in the introduction to Chapter 1 of the 2002 Forest Plan, are means to achieve an end. In some cases, the objectives describe desired conditions and qualitative conditions, rather than levels or units that can be directly measured. In other cases, however, objectives can be readily measured and quantifiable objectives are stated. Whether or not an objective has a measurable or qualitative aspect depends upon the issue being addressed. Non-quantifiable objectives can be monitored and progress evaluated. Professional judgment and other methods are used to determine if qualitative objective are being met.

P148 Public Concern: The Forest Service should provide means for public review and comment on forest plan monitoring.

Response: Monitoring reports are done annually. Public comment is not required on Forest Plan monitoring reports, although comments are welcome. The Forest intends to make monitoring reports available on it's web site in the future where they will be available for review.

P151 Public Concern: The White River National Forest should prioritize monitoring activities by funding availability.

Response: The revised monitoring strategy identifies risk factors and monitoring "drivers" (2002 Forest Plan, Chapter 4, heading – Reasons for monitoring (monitoring drivers)). Drivers are such things as legal requirements, forest plan goals, and agency regulations. In addition, prioritization of monitoring items is one of the reasons a Monitoring Guide will be created. It will contain costs estimates and more information on risk. This will help forest staff prioritize accomplishments within budgetary constraints.

P152 Public Concern: The Forest Service should reserve the right to change special use contracts and permits based on monitoring information.

Response: Special use permits will be adjusted to reflect the new direction in the 2002 Forest Plan as the permits come up for renewal, or during other required administrative actions such as annual operating plans. See the Record of Decision for a discussion of Forest Plan implementation.

If Forest Plan monitoring results in an amendment to the forest plan, special use permits will be updated in a similar manner to that used to bring them in compliance with the 2002 Forest Plan.

Funding for Implementation

P164 Public Concern: The Forest Service should explore a variety of options for securing increased funding.

Response: It is inappropriate for the White River National Forest to lobby Congress for more money.

The Forest currently receives funds from a variety of partners, other agencies and groups.

The ability of the White River National Forest to collect user fees is determined by national programs and policies. The use and distribution of such funds is also determined by Forest Service policy and is not entirely within the authority of a single forest. Many comments suggested that the White River National Forest collect more fees and use the money to pay for projects, sites and development of the Forest. This is not within the Forest's authority.

The Forest can and will continue to work with a variety of fund sources to supplement the federal budget it receives. Many accomplishments could not be met currently, and in the future, without this source of funding and resources.

The Forest Plan did not estimate the amount of partnership, matching funds, or grants that it would receive over the life of the plan. These funds are variable and are not guaranteed sources of funds. The Forest Plan only estimates goals and objectives that can be

achieved with federal funds. Additional work will be accomplished, however, with outside resources.

Volunteers are an additional means of accomplishing forest plan goals. The White River currently has an extensive volunteer program. This will continue.

P160 Public Concern: The Forest Service should consider re-proportioning the forest budget among various management activities at increased budget levels.

Response: Each alternative had a different budget allocation. The purpose of the budget exercise was to show how a reallocation of budget directs the level of outputs.

P159 Public Concern: The Forest Service should reconsider the strategy to recover the costs of special use permit administration.

Response: Program being implemented – Cost Recovery to recover costs associated with issuance or re-issuance of a special use permit. This is law, directive and FS policy. This is outside the scope of the forest plan. This will apply to all alternatives, and including the selected alternative.

P154 Public Concern: The White River National Forest should use less arbitrary determinations of desired budget levels.

Response: Direction for budget analysis was provided by the Rocky Mountain Region Regional Office. While not required, the purpose of this budget analysis is to show that outputs and achievements are restricted by the amount of funding allocated to the White River National Forest. Additional funding would improve the situation and that is the purpose of having a desired budget level. It is not realistic, however, to have an unconstrained budget level. The desired budget level was limited to 150% of the current budget level because it was felt that output levels based on unconstrained budget level would not ever be realized.

The budget analysis presented in the forest plan is not directly tied to the budget appropriation process and should be used for that purpose.

The Present Net Value analysis has been redone for the FEIS. See FEIS Chapter 3, Communities, Financial and Economic Efficiency. It is still based, however, on output levels resulting from the budget analysis.

P158 Public Concern: The Forest Service should consider redistribution of funding between management activities.

Response: The Forest Service is allocated money in certain funds, such as road construction, forest plan monitoring and vegetation management. The Forest has limited discretion in moving money from one fund to another. Budget allocation is not within the forest plan decision.

P162 Public Concern: The White River National Forest should analyze the opportunity costs and impacts of projected lack of funding for capital improvements.

Response: Capital investment needs and the road maintenance backlog are recognized as current management concerns in the forest plan. The White River National Forest, however, cannot resolve those issues in the forest plan. The Forest will continue to work

address these problems and work with programs and administrative activities, other that the forest plan, to resolve them.

P156 Public Concern: The White River National Forest should report on annual costs.

Response: There is a requirement to display costs of carrying out the plan (36 CFR 219.12(k) 3). Data is gathered annually and reported in 5-year intervals to show trend data. This requirement is found in the 2002 Forest Plan.

Staffing for Implementation

P165 Public Concern: The White River National Forest should include an implementation plan in the FEIS.

Response: An implementation plan is not required and is not part of the 2002 Forest Plan. The Record of Decision, however, does discuss how the forest plan will be implemented for ongoing activities. Additional information regarding specific activities, public opportunities to work with the Forest Service and ongoing projects can be obtained by contacting the White River National Forest Supervisor's Office.

P166 Public Concern: The final Plan should be phased into effect in stages.

Response: The 2002 Forest Plan goes into effect 7 days after it is approved (36 CFR 217.10(a)). The Record of Decision discusses how on-going activities will be brought into compliance with the 2002 Forest Plan.

Other Issues of Concern

P169 Public Concern: The Forest Service should analyze the transfer of environmental effects to private land and foreign countries.

The supply and demand for timber from the White River National Forest is discussed in FEIS Chapter 3, Topic 6—Timber Management, Timber Supply and Demand heading. The demand for timber was analyzed regionally, looking at a multi-state area. It is not appropriate to look at the supply of timber from one National Forest in the context of the global economy.

Global climate change will not be measurably impacted by the land management activities occurring on the White River National Forest.

Chapter 2
The Alternatives

Development of Alternatives

A50 Public Concern: The FEIS should analyze the current Forest Plan as a No Action Alternative as required by NEPA. – and –

A29 Public Concern: The FEIS should clarify the difference between Alternatives B and A.

Response: NFMA regulations at 36 CFR 219.12(f)(7) state that "at least one alternative shall reflect the current levels of goods and services provided by the unit and the most likely goods and services expected to be provided in the future if the current management direction continues. Pursuant to NEPA procedures this alternative shall be deemed the No Action Alternative."

As we analyzed the 1984 Forest Plan, it became clear that significantly changed circumstances had occurred, primarily in the timber management area, but also in several other resource areas. Alternative A and Alternative B, in both the DEIS and FEIS, are called No Action. Alternative A took the 1984 Forest Plan for the White River National Forest and presented it as is, with no modifications. We then carried out analysis on this alternative to see if it could be brought forward into the analysis in the DEIS. Due to increased knowledge of resource conditions, a better ability to analyze data, changed public concerns, and emerging national policy, Alternative A was not found to be a viable alternative. Instead, Alternative A was updated to incorporate new data, technology, and changed conditions. It became Alternative B, an updated No Action Alternative that could be directly compared to the other alternatives developed in the DEIS. This information is presented in greater detail in the FEIS Volume 1, Chapter 2.

General Analysis of Alternatives

A54 Public Concern: The Forest Service should account for budgetary constraints associated with each alternative.

Response: Budgetary constraints and their effects on the implementation of alternatives were analyzed for the DEIS and FEIS. A summary of this information appears in the FEIS Chapter 2, Tables 14 through 16 (supplementary tables 1-3). Both an average three-year experienced budget and a full implementation budget (1.5 times greater than experienced levels) were used in this analysis.

A51 Public Concern: The Forest Service should explain how the land uses under each alternative were determined.

Response: Each of the seven forest management alternatives described in Chapter 2 of the FEIS consists of the same basic set of forest-wide and management area-specific standards and guidelines. The alternatives differ from one another through their management area allocation. Each alternative uses a different combination, amount and distribution of acreage for each management area prescription across the White River National Forest. These allocations are based on the theme of each alternative.

Descriptions of themes for each alternative and the range of alternatives can be found in the FEIS Volume 1, Chapter 2.

A55 Public Concern: The Forest Service should address its failure to provide a complete analysis of the cumulative effects under each alternative.

Response: Cumulative effects analysis was revisited by the interdisciplinary team between the DEIS and FEIS. Cumulative effects constitute the cumulative impacts of past, present, and future land management. It is important to note that the existing condition description and the direct and indirect effects discussions all contribute to the complete cumulative effects analysis, not just the section specifically labeled Cumulative Effects. All sections of the effects analysis include a cumulative effects analysis that includes discussion of reasonable and foreseeable future actions on federal and other jurisdictions.

Range of Alternatives

A5 Public Concern: The Forest Service should consider all reasonably foreseeable alternatives.

Response: During the course of interdisciplinary teamwork, we initially developed several alternatives. Six of these were analyzed fully in the DEIS. Alternatives that were originally discussed, but not analyzed in detail are described in the FEIS Volume 1, Chapter 2. This discussion includes our reasons for not fully analyzing these alternatives.

Alternatives prepared for consideration in a forest plan revision must provide for a broad range of reasonable management scenarios for the various uses of the forest (36 CFR 219.12(f)). A primary goal in formulating alternatives is to provide an adequate basis for identifying the alternative that comes closest to maximizing net public benefit in an environmentally sound manner. Thus, the evaluation of the range of alternatives does not turn upon consideration of a single factor or forest activity, but must rather consider the alternatives as a whole.

The planning regulations (36 CFR 219.1(a)) state “plans shall provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term public benefits in an environmentally sound manner.” Net public benefits include all outputs, both positive and negative, and include values that cannot be quantitatively valued. Therefore, we must subjectively balance such qualitative benefits and costs with each other and with those that can be quantified.

A57 Public Concern: The Forest Service should consider an adequate range of alternatives.

A57.1 Increased Recreation Alternative

Response: Alternatives have to balance recreational demands with the demands of other forest users and with sound environmental management. The forestland and resource base does not automatically fully meet the demands of all uses for the forest. Recreation demand is addressed in the FEIS Volume 2, Chapter 3, Topic 3, Part 1—Recreation Management. All alternatives consider and address projected recreation needs. While all alternatives provide opportunities for increased levels of recreation, they differ in how they emphasize and allocate developed and dispersed recreation opportunities.

A57.2 No Timber Harvest Alternative –and–

A57.3 No Commodity Production Alternative –and–

A57.4 A No Development of Public Land Alternative

Response: A Forest Plan does not, in itself, allow or disallow development of public lands. Such decisions, including individual ski area expansions, are made as part of forest plan implementation. Site-specific environmental analyses will be conducted for individual activities. Alternatives in these site-specific analyses may include no development alternatives.

Forest Plans identify land allocations (management areas) and the types of activities that may occur within them in the future. The alternatives vary in how lands are assigned to management area prescriptions. Some management areas do not allow for certain kinds of future development, and others do.

A57.5 A Balanced Multiple-Use Alternative

Response: All alternatives allow for multiple use of the White River National Forest. The alternatives differ in the amount of each use that would occur if a certain alternative were implemented.

Section 4(a) of the Multiple Use Sustained Yield Act states:

> Multiple use means the management of all the various renewable surface resources of the National Forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and condition; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resource, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

The National Forest Management Act (NFMA) regulations at 36 CFR 219.1(a) state that ". . . plans shall provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term net public benefits in an environmentally sound manner." There are no specific requirements in NFMA to provide a certain quantity or quality of any resource or use.

A57.6 More Recommended Wilderness Acres Alternative

Response: Acres recommended for wilderness vary across alternatives from 0 acres in Alternative B to 200,400 acres in Alternative I. Available and capable roadless acres not recommended for wilderness designation were assigned to other management area prescriptions. Roadless areas allocated to management area group 1: management area categories 1 and 2; and group 2: management area categories 3 and 4 are most likely to retain or all or some roadless characteristics. The percent of available and capable acres allocated to groups 1 and 2 varies from 16% in alternative F to 95% in Alternative I. This provides for analysis of an adequate range of alternatives for the 2002 Forest Plan. The FEIS provides for analysis and consideration of wilderness recommendations across a reasonable continuum of responses to the revision topics.

A52 Public Concern: The Forest Service should develop alternatives that are not mutually exclusive. – and –

A31 Public Concern: The Forest Service should combine alternatives.

A31.1 C and D

A31.2 C and I

A31.3 D and I

Response: Alternatives presented in the FEIS are not mutually exclusive. While each alternative addresses each revision topic in a different manner, some alternatives address revision topics in a very similar manner. All alternatives also apply the same package of forest-wide and management area-specific standards and guidelines. Additionally, Alternative K draws on aspects of other alternatives (particularly C, D, and I) as well as public input. The final record of decision may incorporate aspects of different alternatives that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

A62 Public Concern: The Forest Service should consider an adequate range of alternatives for site-specific Travel Management Plans in accordance with NEPA.

Response: Based on public comment indicating a desire for more time to review travel management plans on the ground, a need to improve the inventory of existing travelways, and the difficulty of simultaneously completing the travel management and forest plan decision, we have decided to separate the two decisions. At the forest plan level, new standards and guidelines will still be incorporated to provide forest-wide direction. However, a site-specific travel management plan will not be included in the forest plan decision. The site-specific travel management plan (and associated analyses) will be initiated upon completion of the 2002 Forest Plan.

Preferred Alternative

A63 Public Concern: The Forest Service should clarify methods and criteria used to identify Alternative D as the Preferred Alternative.

Response: All alternatives were evaluated in terms of how they responded to each revision topic, and the manner in which they balanced opportunities and protections across revision topics. The information used in this analysis is presented in the FEIS Chapter 3 and summarized in the FEIS Chapter 2. In addition, a process known as "Choosing by Advantages" was used to assess how alternatives responded to an additional set of subfactors drawn from scoping comments and public comment on the draft, as well as those identified by forest staff and specialists. A description and comparison of how alternatives met these subfactors will be presented in the Record of Decision. All information used in the assessment of the subfactors is presented in the FEIS, Volume 2, Chapter 3, resource topic analysis sections. A full description of this process is included in the administrative record and on file at the White River Forest Supervisor's Office in Glenwood Springs, CO.

A3 Public Concern: The Preferred Alternative should be consistent with stated goals and objectives.

Response: Alternatives vary in the way they meet the goals and objectives stated in the 2002 Forest Plan. All alternatives meet the Government Performance and Results Act goals and objectives to some degree. The alternatives differ in how these goals and objectives are met.

The selected alternative, like all alternatives analyzed, will address the national goals set out in the Natural Resource Agenda. The forest will be managed to address these four priorities. None of the four priority items can exclude the other, and none of the four priorities overrule any other.

All alternatives provide all forest uses that are part of current forest management, including recreation. Recreation, as a resource agenda priority, must be managed in accord with the other resource agenda priorities of watershed health, sustainable ecosystems, and road management.

A11 Public Concern: The Forest Service should or should not adopt Alternative B. – and –

A13 Public Concern: The Forest Service should or should not adopt Alternative C. – and –

A13.1 For Recreation

A13.2 For Fewer Acres Available For Mineral Exploration

A13.3 For Preservation Of Scenic Resources

A13.4 For Ski Area Expansion

A13.5 For Annual Timber Harvest Levels

A13.6 For Management Area Allocations

A15 Public Concern: The Forest Service should or should not adopt Alternative D. – and –

A15.1 Active Management Is Best

A15.2 For Long-Term Use

A15.3 For Recreation Management

A16 Public Concern: The Forest Service should or should not adopt Alternative D. – and –

A16.1 Too Restrictive

A16.2 Not Restrictive Enough

A16.3 Too Much Active Management

A16.4 Not Based On Sound Scientific Principles

A18 Public Concern: The Forest Service should or should not adopt Alternative E. – and –

A18.1 To Protect Four-Wheel Drive User Interests

A20 Public Concern: The Forest Service should or should not adopt Alternative F. – and –

A22 Public Concern: The Forest Service should or should not adopt Alternative I.– and –

A22.1 To Manage Using Natural Processes

A22.2 To Provide for Multiple Use

A22.3 For Motorized Restrictions In Semi-Primitive Areas

A22.4 For Lynx Habitat

A22.5 For Greater Wilderness Recommendations

A22.6 To Protect Roadless Areas

A22.7 For Biological Diversity

A23 Public Concern: The Forest Service should or should not adopt Alternative I.

Response: Many people wrote in and voiced an opinion in clear support of or opposition to one of the alternatives presented in the draft. Many of these opinions were offered with supporting reasons. Some were written as votes, stating a position, but lacking a substantiating argument. It is important to note that comments are not reviewed as if they were votes. The forest plan revision process under NEPA, while open and inclusive, is not a legislative process. Each comment was individually read and reviewed by the Content Analysis team for specific content. Due to the volume of public comments, not all of the details of these comments are included here. Individual comments and public concern statements were reviewed and used by the forest specialists to revise and improve the EIS and forest plan between draft and final versions.

The most common reasons for citing support of, or opposition to, a particular alternative addressed some component (or multiple components) of the following issues:

- Recreation as the primary use of the forest
- Road and trail closures
- Adequacy of scientific justifications
- Documentation of social and ecological consequences
- Managment according to human demands vs. ecological sustainability
- The concept of balancing uses
- Completeness of the biological diversity or ecosystem analysis
- Restrictions on recreation use (too many, not enough)

Most of these concerns are specifically addressed in the responses to public concern statements in the forest resource sections of this document (i.e. biological diversity, recreation, travel management), or in the appropriate section of the FEIS.

Comments and concerns on individual alternatives are used to gauge public values, beliefs and attitudes. This information was used in an interdisciplinary fashion to identify

themes and ideas that were either not included in the draft documents or were not presented clearly and understandably. The preferred alternative and Chapter 3 of the FEIS reflect this information.

Many comments included statements asking that certain items be taken from some alternatives combined with parts of other alternatives to form a new alternative comprised of the best features of several alternatives. These comments were taken into consideration and in some cases contributed to the formulation of Alternative K.

Alternative K reflects all aspects of the national resource agenda, including managing safe, efficient road systems, as well as ensuring watershed health and ecosystem sustainability.

The Forest Service does not manage lands by allowing negative impacts on some lands to be offset by positive impacts on other lands. All lands must be managed for healthy ecological conditions. All lands are subject to forest-wide standards and guidelines (2002 Forest Plan Chapter 2 and management area standards and guidelines (2002 Forest Plan Chapter 3), which are intended to result in certain ecological and social conditions (desired future conditions). All lands are available for a variety of human uses, including recreation.

In many cases, comments on both sides of an issue were received, and we organized the Response to Comment document to address the public's pro and con arguments about similar issues in the same agency response. Many issues generate two or more points-of-view among the comments, therefore, not all preferences can be reflected in the preferred alternative.

Modified and Non-Agency Alternatives

A64 Public Concern: The Forest Service should modify Alternative D.

A64.1 Land Use Allocations

A64.2 To Designate More Lands For Protection Of Ecosystem Functions

Response: We developed Alternative K in response to public comments received on the draft Forest Plan and DEIS, and also to incorporate new Forest Service policies. Many of the public's concerns focused on the need for an alternative that better emphasized various combinations of uses across the forest. As such, Alternative K builds in part on land use allocations presented in the DEIS for Alternative D. Significant differences between these two alternatives include that Alternative K allocates greater acres of land as recommended for wilderness status and as designated corridors.

A66 Public Concern: The Forest Service should modify Alternative F to emphasize mineral development as an equal partner with other forest management goals.

Response: The national and regional importance of mineral development is recognized in Goal 2—Multiple Benefits to People (2002 Forest Plan Chapter 1). This goal applies to all alternatives and holds no priority over other goals. Specifically, the Forest Service will continue to: address requests for leasing, exploration, and development of mineral and energy resources in accordance with regulations and forest plan availability decisions; ensure reclamation provisions of operating plans and surface use plans of operation are completed to standard; provide for mineral materials when the national forest is the only

available source for these materials; and provide for mineral exploration and development, in accordance with laws and regulations.

A71 Public Concern: The Forest Service should evaluate whether alternatives developed by non-agency groups should be officially considered.

A71.1 Allow Interest-Group-Authored Alternatives

A71.2 Do Not Allow Interest-Group-Authored Alternatives

Response: We fully analyzed the six alternatives which appeared in the DEIS and seven alternatives that appear in the FEIS. A version of Alternative I was originally proposed by the Aspen Wilderness Workshop for inclusion in the DEIS. The planning team then edited and modified their version of the alternative to make it compatible with the other alternatives. Although drafted by an outside group, we made necessary changes and edits to Alternative I for consistency and so that it could undergo the same level of analysis as the other alternatives. All interest groups were given the same opportunity to submit comments for the alternative development process during the scoping phase of the plan revision process.

On May 8, 2000, Congressman Scott McInnis provided the Forest Supervisor with a public comment letter on the draft forest plan and DEIS. This comment letter has two main components, a set of written documents on specific issues and a management area map. We refer to the comment letter henceforth as the "Blended Alternative." The full text of this comment can be found in the Government Comment Letters section at the end of this Appendix. The map is located in the map packet, which is available on the web site, on CDROM, at Forest Service offices, and at local libraries.

The comment letter provided specific information on many issues. The cover letter identified six primary issues: water, wildlife management, intermix, allowable ski area expansion, travel management, and wilderness. Statements of management intent, and in some cases, rewording of direction, were also proposed.

General themes in the Blended Alternative included: community and local support, multiple use opportunities, and general resource protection. These ideas were also stated in many other public comment letters. We address the issue of community and local support by including an expanded discussion of public collaboration in 2002 Forest Plan Chapter 1, Goal 5. Alternative K addresses multiple-use opportunities by providing a range of resource outputs, both recreational and commodity. General resource protection is outlined in the various management prescription standards and guidelines.

The interdisciplinary team examined and discussed components of the map and comment letter. Some ideas and positions stated in the Blended Alternative have been incorporated into the formulation of Alternative K. Some issues raised in the Blended Alternative are not forest plan issues, or are better addressed elsewhere. In some instances, the Blended Alternative proposals have been considered and incorporated in part or in a modified form in order to be responsive to other public concerns on similar issues. Each proposal is addressed more specifically in the appropriate forest resource sections of this document.

A68 Public Concern: The Forest Service should consider the McInnis Alternative equally with those presented in the DEIS. – and –

A36 Public Concern: Representative Scott McInnis' Modified Alternative should be the selected alternative in the FEIS. – and –

A69 Public Concern: The Forest Service should not consider the McInnis Alternative equally with those presented in the DEIS.

Response: The comment letter and alternative map that we received from Representative Scott McInnis was reviewed and used, like other comments, in the creation of the 2002 Forest Plan and set of alternatives in the FEIS. The comment letter provided specific information on many issues. The cover letter identified six primary issues: water, wildlife management, intermix, allowable ski area expansion, travel management, and wilderness. Statements of management intent, and in some cases, rewording of direction, were also proposed.

The following is a summary of how the six issues raised in the cover letter were addressed in 2002 Forest Plan direction (Chapters 1, 2, and 3) or in Alternative K. Full discussion of these issues may be found in specific resource topic areas of this Response to Comment document and throughout the 2002 Forest Plan.

Water: The Blended Alternative proposes specific rewording of standards and guidelines for the management of water resources. This wording was not incorporated directly into the 2002 Forest Plan. Because of the degree of concern and controversy, however, all water direction has been carefully examined and re-written. Updated water aquatic and riparian direction can be found in the 2002 Forest Plan, Chapter 1 (Goal 1, Ecosystem Health), and Chapter 2 (Water and Riparian Resources).

Wildlife: Alternative K reflects an increase in winter range from the current Forest Plan, a concern raised in the Blended Alternative.

Intermix: The Blended Alternative would apply the intermix prescription in various areas—an allocation that identifies areas where there are opportunities to address issues that cross many ownership boundaries. Alternative K applies this prescription to 7,800 acres.

Ski Area Expansion: The Blended Alternative would allow for expansion of ski areas in certain locations, notably Summit County. Alternative K reflects this suggestion, allocating the most additional 8.25 prescription acreage to the ski resorts in Summit County, with limited additions elsewhere.

Travel Management: The Blended Alternative included site-specific travel management recommendations, in reflection of the DEIS whch included site-specific travel plans. However, in response to numerous public requests, we have separated the travel plan from the forest plan decision, and a separate round of travel management planning will start after the 2002 Forest Plan is adopted. The comments on individual roads and trails in the Blended Alternative, as well as all other similar public comments we received on the DEIS, will be taken into account in the upcoming travel planning effort. Although the Travel Management Plan will provide site-specific travel management direction, the 2002 Forest Plan does contain broad guidelines and forest-wide direction. The general travel management concepts contained in the Blended Alternative were considered as we

revised the draft Forest Plan. Areas of consistency with Alternative K include opportunities for looped trails and scenic byways.

Wilderness: Of the 8 areas proposed for wilderness designation in the Blended Alternative, 5 of them are included in Alternative K. These areas are: Treasure Mountain, Ute Pass, Acorn Creek, North Independence, and Hunter. See FEIS Volume 2, Chapter 3, Topic 4—Roadless Area Management and Recommended Wilderness for location and description of these areas.

In addition to the six resource topics listed above, general themes in the Blended Alternative included: community and local support, multiple use opportunities, and general resource protection. These ideas were also stated in many other public comment letters. In response to the issue of community and local support, the 2002 Forest Plan now includes and expanded discussion of public collaboration (2002 Forest Plan Chapter 1, Goal 5). Alternative K provides for a range of resource outputs, both recreational and commodity.

A70 Public Concern: The Forest Service should develop and consider Eagle County's Alternative Z.

Response: Eagle County's outline sketch of Alternative Z recommends a combination of aspects of Alternatives C, D, and I. These aspects were considered either in the development of Alternative K or in the evaluation of each alternative during the FEIS effects analysis.

Chapter 3
Affected Environment and Environmental Consequences

TOPIC 1
BIOLOGICAL DIVERSITY AND ECOSYSTEM COMPONENTS

Part 1—Physical Elements

Section 1—Soils and Geology

E1 Public Concern: The Forest Service should address the effects of activities on soil health.

Response: The relative contributions of each alternative and the effects of activities on soil health are addressed in FEIS Volume 1, Chapter 3, Topic 1, Part 1, Section 1—*Soils and Geology*. The standards for protecting soil resources are identified in the 2002 Forest Plan, Chapter 2, Physical, Soils. Additional information supporting each standard can be found in the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25).

E2 Public Concern: The Forest Service should work cooperatively with other agencies and organizations to restore eroded sites.

Response: We agree that cooperation between our agency and other organizations and agencies is important. Determination of how we will cooperate in multi-agency projects related to watershed reclamation is outside the scope of this analysis and is more appropriately addressed on a project-specific level.

E3 Public Concern: The Forest Service should avoid disturbing soils in alpine and tundra areas.

Response: We agree with the need for the forest plan to provide more direction to protect fragile alpine ecosystems. A new section of standards and guidelines specific to alpine areas has been developed and is now included in the 2002 Forest Plan, Chapter Two, Biological, Alpine. These standards and guidelines are designed to protect alpine ecosystems including soils.

Standards 1. Prohibit campfires above treeline to protect alpine ecosystems.

2. Prohibit new developments in alpine wetlands, streams, and riparian areas.

Guidelines 1. Prohibit new roads, trails, and livestock driveways in alpine areas except when needed to reduce existing resource impacts.

2. Minimize soil excavation and disturbance due to new construction in alpine areas by locating structures on flat or nearly flat sites and minimizing size of structures.

3. Minimize the concentration of public uses in alpine areas when such use is creating resource damage.

Section 2—Watersheds

E4 Public Concern: The Forest Service should choose an alternative that protects water quality and watershed health.

Response: Water quality and watershed health are important. The Forest Service is required by law and guided by policy to protect water quality and watershed health. The legal and administrative framework that guides the Forest Service in protecting watershed resources is identified in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 2 – *Watersheds*. The relative contributions of each alternative to water quality and watershed health are also addressed in this section.

E5 Public Concern: Alternatives in the FEIS should address activities on the forest that affect water resources.

Response: An analysis of the impacts of management activities on water resources is presented by alternative in the FEIS, Chapter 3, Topic 1, Part 1, Section 2—*Watersheds*. As documented in the Organic Act of 1897 that established National Forests, water originating on the White River National Forest will continue to be one of the most important uses we consider in management decisions. The legal requirements we are expected to meet are also described in the FEIS, Volume 2, Chapter 3, Topic 1, Part 1, Section 2—*Watersheds*. In addition, we must comply with the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25). The standards in the WCPs are incorporated in the 2002 Forest Plan and are intended to protect soil, aquatic, and riparian systems.

E6 Public Concern: Protection of riparian areas should be a Forest Service priority.

Response: We have incorporated the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25) into the 2002 Forest Plan. The standards that protect riparian areas can be found in the 2002 Forest Plan, Chapter 2, *Water and Riparian Resources*.

E7 Public Concern: The Forest Service should allow beaver to enhance riparian areas.

Response: The use of beaver to enhance riparian areas is outside the scope of this analysis and is more appropriately addressed on a project-specific level.

E8 Public Concern: The Forest Service should not distinguish between the different modes of transportation in managing for potential water quality impacts.

Response: The Forest Service must distinguish between different transportation use types to prevent water quality degradation. For example, a large four-wheel drive vehicle has far more potential impact on water quality than the vehicle's driver walking along the same route. Nationally, there is some debate on the impacts different modes of transportation, such as horses and mountain bikes, have on the land. Each user group tends to claim that other groups have more impacts. That debate and determination is outside the scope of this forest planning process. Our fundamental goal is to protect water quality. In addition to the types of use, other factors will be examined on a site-specific basis, such as the amount of use, soil type, and its ability to withstand wear, and the level at which a particular site is hardened and developed to handle the use.

E9 Public Concern: The Forest Service should address the effects of snowmaking on water yield.

Response: General impacts of snowmaking on water resources (including water yield) are discussed in the FEIS, Volume 2, Chapter 3, Part 1, Section 2—*Watersheds*, Effects on Water Resources from Ski Area Management. How snowmaking is addressed in ski-resort planning is outside the scope of this analysis and is more appropriately addressed on a project-specific level.

E10 Public Concern: The Forest Service should adopt an alternative that maintains timber harvest in order to increase water yield. – and –

E11 Public Concern: The Forest Service should not support logging to increase water yield.

Response: Water originating on the forest, as documented in the Organic Act of 1897 that established National Forests, will continue to be one of the most important uses we consider in managing the White River National Forest. National Forest System lands are managed to standard, providing municipal and domestic water supply needs. The FEIS further defines the legal requirements we are expected to meet in providing quality water for water supplies.

36 CFR 219.12 (f)(1) states in part, "Alternatives shall be distributed between the minimum resource potential and the maximum resource potential to reflect to the extent practicable the full range of major commodity and environmental resource uses and values that could be produced from the forest." A range of alternatives has been presented in the DEIS that satisfies this regulation. Alternatives D, K, and F provide slightly higher water yields while meeting other laws and resource management requirements.

E12 Public Concern: The Forest Service should monitor the effects of extractive activities on watershed and reservoir water quality in the Blue River watershed.

Response: It is outside the scope of this forest planning analysis to assess specific impacts to watershed resources from proposed timber sales in the Blue River basin. Disclosure of potential impacts from such activities will be conducted through project-specific NEPA analyses. Appropriate standards and guidelines will be applied during all resource management activities to protect water quality in streams and reservoirs. These include the standards and guidelines listed in the 2002 Forest Plan, Chapter 2, *Soils and Water and Riparian Resources*. Further information regarding the guidelines (design criteria) supporting many of these standards is in the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25). A copy of the WCPs can be found in the administrative record at the Forest Supervisor's Office.

E13 Public Concern: The Forest Service should address how proposed goals, standards, objectives and guidelines comply with water regulatory authorities.

Response: Revised Water Quality Goal 1.10 and Objective 1.10 provide 2002 Forest Plan (Chapter 1) direction to protect watershed health for proposed new uses, and for renewals of existing uses. The Forest Service, under federal law, is required to protect and maintain National Forest resources for multiple uses. We recognize the importance of Colorado state agency programs such as the Colorado Water Conservation Board's (CWCB) instream flow program and the Colorado Water Quality Control Division's water quality protection program. We view our Plan direction as complementing these programs and will continue to work cooperatively with these agencies as appropriate and when we deem CWCB's instream flow rights adequate to protect National Forest resources. In addition we will address other aquatic resource needs in separate site-specific analyses if, where, and when necessary in order to fulfill our responsibilities under federal law.

E14 Public Concern: Forest Plan standards and guidelines should provide greater protection for watersheds. – and –

E15 Public Concern: Water and Riparian standard #7, #8, #10 and # 12 in the draft forest plan should be revised or deleted.

Response: While the Forest Service recognizes the authority of other government agencies (such as the U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, and Colorado Department of Public Health and Environment), we must also comply with our own policies. For example, FSM 2520 outlines the objectives and policies that apply to watershed protection and management. FSM 2520 specifically addresses riparian area and floodplain management as well as wetlands protection.

The Water and Riparian Resources standards found in Chapter 2 of the draft forest plan are part the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25). The Forest Service's Rocky Mountain Regional Office mailed draft WCPs to 60 external interests in September 1995 to solicit comments. Nineteen of these interests returned comments by December 1995. After responding to comments and reworking the document, the WCP Handbook was adopted as an official handbook on December 26, 1996, and is now part of the Forest Service directives system. A copy of the WCP Handbook can be found in the administrative record at the Forest Supervisor's Office.

As part of a Regional Office directive, deletion or revision of these standards is outside the authority of the Forest Supervisor and not within the scope of this 2002 Forest Plan.

E16 Public Concern: The Forest Service should revise water and aquatic resources standards for the final plan.

16.1 Standard #5

Response: Standard #5 is established within the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25, Standard 12.1). The guidelines (design criteria) supporting this standard can be found in the WCP Handbook, Chapter 10, page 4. A copy of the WCP Handbook can be found in the administrative record at the Forest Supervisor's Office.

A definition of "watershed influence zone" has been added to the glossary for the FEIS (Volume 4, Appendix L). While the Forest Service recognizes the authority of other government agencies, we must also comply with our own policies. For example, FSM 2520 outlines the objectives and policies that apply to watershed protection and management. FSM 2520 specifically addresses riparian area and floodplain management as well as wetlands protection.

16.2 Standard #6

Response: Standard #6 is established within the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25, Standard 12.2). A copy of the full WCPs, with design criteria, is available at the Supervisor's Office. The phrase "free movement" (as it is worded in Standard #6) includes movement both up and down the stream. There may be cases, in fact, where a stream barrier is desirable to prevent exotic fish from invading upstream native fisheries. These conditions will be analyzed before constructing specific stream crossings and other instream structures.

The design criteria (guidelines) associated with Standard #6 provide direction to protect aquatic life and channel stability without constructing unnecessarily large structures. In fact, the design criteria state, "…ensure that all facilities remain stable, not necessarily pass the entire flood flow."

16.3 Standard #9

Response: The Water and Aquatic Standard #9 is part of the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25, Standard 12.5). Wording for this Standard has been revised by the Regional Office since publication of the DEIS. The amended language is included in the 2002 Forest Plan, Chapter 2, *Water and Riparian Resources*.

Standard #9 provides direct guidance for protecting streamflows on the White River National Forest—particularly when considered in conjunction with Forest Service authority to protect stream processes, riparian and aquatic habitats, and recreational and aesthetic values. Additionally, the standard and its design criteria provide guidance for protecting stream flow dependent resources, while being sensitive to historic uses. The Forest Service, under federal law, is required to protect and maintain National Forest resources for multiple uses. We recognize the Colorado Water Conservation Board's ("CWCB") authority to hold instream flow water rights. In addition, the Forest Service will address stream flow needs in separate site-specific analyses (if, where, and when necessary) in order to fulfill its responsibilities under federal law.

E17 Public Concern: The FEIS should include baseline data on the condition of riparian areas.

Response: The watershed condition ratings aided in determining the condition of riparian areas in each 6th level watershed. Please refer to Tables J-1 through J-6 in FEIS Volume 4, Appendix J for the watershed condition class rating for each 6th level watershed on the Forest.

E18 Public Concern: The FEIS should identify key watersheds for special protection.

Response: While the White River National Forest does not used the term "key watershed" (a term used in the Forest Ecosystem Management Assessment Team's Aquatic Conservation Strategy for federal forests of the Pacific Northwest), we have identified watersheds sensitive to human and/or natural disturbances. A description of the process is provided in FEIS Volume 4, Appendix J. Maps in the appendix identify these watersheds. Caution must be applied when interpreting these maps as they are meant strictly as a coarse screen for generally determining watershed conditions for each 6th level watershed in the Forest. Site-specific information, as required for project proposals, may indicate that the condition of a specific 6th level watershed is better or worse than initially determined.

E19 Public Concern: The FEIS should identify types of impacts and disturbances watersheds can recover from.

Response: Because each watershed is unique in its ability to recover from natural and/or human caused disturbances, the discussion of recovery time frames from specific impacts is outside the scope of forest plan documents and is best conducted on at a project-specific level.

We did make stylistic changes to Appendix J (FEIS Volume 4) in order to clarify the types of human influenced factors considered in the assessment of watershed conditions.

E20 Public Concern: The Forest Service should use a multi-metric index for watershed health.

Response: Watershed and fish habitat analyses on the forest are ongoing. We typically conduct watershed assessments in an interdisciplinary fashion during which resources such as wildlife and fish habitat, soils productivity and water quality are factored into determinations of watershed health.

E21 Public Concern: The FEIS should include information on existing conditions and trends of riparian areas for each Geographic unit.

Response: The scope of this document does not lend itself to detailed discussion of site-specific riparian conditions and trends. Such discussion is more appropriate and meaningful at a project level when site-specific data is collected and analyzed to determine watershed condition, including riparian health. The lack of such information within the FEIS does not preclude routine application of measures to protect riparian resources, nor does it prevent the Forest from rehabilitating riparian areas if and where needed.

General information of the condition of each of the 6th level watersheds on the Forest was compiled using a process described in Appendix J to the FEIS. Sources of this information include specialists' knowledge of a watershed including past and current management activities, impacts of those activities, as well as GIS maps of natural hazards to watershed health.

E22 Public Concern: The Forest Service should use a spatial analysis of roads to estimate impacts to watershed health. – and –

E23 Public Concern: The FEIS should state the effect of roads on watersheds.

Response: The FEIS has been updated from the DEIS, and now contains information on the effects of roads on water and riparian areas. See FEIS Volume 2, Chapter 3, Topic 2, Part 1, *Travel Management and Infrastructure*, Direct and Indirect Effects

E24 Public Concern: The Forest Service should protect watersheds from corporate development.

Response: The Forest Service agrees that water quality is important. The Forest Service will continue to work with local, state and federal agencies to protect water quality and watershed health, as well as plan and implement watershed improvement activities as conditions dictate. The legal and administrative framework that guides the Forest Service in protecting watershed resources is identified in FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 2 – *Watersheds*, Introduction. Standards for protecting watershed resources can be found in the 2002 Forest Plan, Chapter 2, *Water and Riparian Resources* and Chapter 3, *Management Area 8.25*.

Further information regarding the guidelines (design criteria) supporting many of these standards is in the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25). A copy of the WCPs can be found in the administrative record at the Forest Supervisor's Office. Assessment of individual streams will be addressed through the site-specific NEPA process as projects are proposed to the Forest Service. The Forest Service must give adequate consideration to proposals from both private and public entities.

E25 The Forest Service should consider the Seven Castles area a designated high-risk watershed.

Response: Our screening data for watershed risk assessments agree that the Seven Castles area has a high risk of natural instability. The watershed risk assessment also includes human influenced factors, which, for the Seven Castles area, are minimal. When combined, both factors give the watershed a moderate risk value. Because the assessment is a coarse screen for generally determining watershed conditions for each 6^{th} level watershed in the Forest, a more detailed analysis and assessment would accompany any site-specific project planning.

E26 Public Concern: The Forest Service should ground truth watersheds.

Response: The Forest Service agrees that ground-truthing data derived from aerial photography is critical to protecting riparian and wetland areas. Ground truthing will occur on a project-specific level where there may be potential impacts to stream channels, riparian areas and wetlands. This data, as it is collected, will be added to the Forest's database and used to further refine our assessments of watershed condition and health.

E27 Public Concern: The Forest Service should address the effect of draw-down levels on the Reudi Reservoir boat ramp.

Response: Water levels in Ruedi Reservoir are determined by the Bureau of Reclamation and not by the Forest Service. In addition, the effect of reservoir draw-downs is outside the scope of this forest planning analysis and is best addressed through the site-specific NEPA analysis process. Concerns about and potential remedies to the problems

encountered during draw-down levels of Reudi Reservoir should be directed to the Sopris District Ranger.

E28 Public Concern: The Forest Service should implement the Ruedi Reservoir pump-back diversion project.

Response: The decision regarding implementation of the Ruedi Reservoir pump-back diversion project (Homestake II) is outside the scope of this forest planning analysis. A separate, site-specific NEPA analysis will be conducted prior to a decision on this proposal. The site-specific analysis will be subject to additional opportunities for public comment.

Water Rights

E29 Public Concern: The Forest Service should honor existing municipal water rights.

Response: Table 27 in the FEIS provides a list of the public supply watersheds that occur on the White River National Forest. These include those watersheds covered under Colorado statutes C.R.S. 39-15-707(1)(b). Moreover, language was removed from the FEIS suggesting that forest management activities can legitimately interfere with the ability of watersheds to deliver suitable water for municipal use.

E30 Public Concern: The FEIS should clarify how the 2002 Forest Plan will affect pre-Federal Land Management Act land use authorizations for water facilities.

Response: Valid outstanding rights are addressed in the Preface to the Forest Plan under the heading "Valid Outstanding Rights". This discussion addresses how valid existing rights will be considered, and how Forest Plan may have to be adjusted to allow for such rights.

E31 Public Concern: The Forest Service should address the effects of Alternative D on water rights.

Response: Alternative D would not result in more by-pass flow requirements than other alternatives of the Forest Plan. Forest Service Region 2 policy directs all Forests, including the White River National Forest, to include standards found in the Watershed Conservation Practices Handbook in their Revised Forest Plan documents. All alternatives in the Revised Plan would have to comply equally with these standards, which include protection of the health of perennial streams under appropriate authorities.

E32 Public Concern: The White River National Forest should recognize water rights and Ditch Bill easements.

Response: The Forest Service recognizes Colorado State law governing water rights and will continue to cooperate with existing water users in order to balance streamflow protection and historic water use. The process for Ditch Bill issuance is outside the scope of this analysis and is more appropriately addressed through project-specific assessment and planning.

E33 Public Concern: The 2002 Forest Plan should not be used to impose bypass flows.

Response: Water supply development is a legitimate use on national forest lands that is generally authorized under a special use permit. Terms and conditions are applied to special use permits requiring compliance with federal law. These terms and conditions may also include, but are not limited to, requiring water be left in a stream to minimize damage to resources such as fish and wildlife habitat. Such terms and conditions are not decided in the 2002 Forest Plan but are considered, on a case-by-case basis, during the issuance of a special use permit. The goals and objectives (2002 Forest Plan, Chapter 1) and standards (2002 Forest Plan, Chapter 2) will provide guidance in developing the terms and conditions of individual special use permits as they come up for issuance.

E34 Public Concern: The Forest Service should understand and abide by the legalities of the acquisition of instream flows.

Response: The Forest Service, under federal law, is required to protect and maintain National Forest resources for multiple uses. We recognize the importance of Colorado state agency programs such as the Colorado Water Conservation Board's (CWCB) instream flow program and the Colorado Water Quality Control Division's water quality protection program. We view our Plan direction as complementing these programs. The Forest Service will continue to work cooperatively with these agencies as appropriate and when the Forest Service deems CWCB's instream flow rights adequate to protect National Forest resources. In addition, the Forest Service will address streamflow needs in separate site-specific analyses if, where, and when necessary in order to fulfill its responsibilities under federal law.

E35 Public Concern: The Forest Service should recognize the Colorado Water Conservation Board's regulatory control over instream water flow.

Response: The Forest Service recognizes the Colorado Water Conservation Board's (CWCB) authority to hold instream flow water rights. As appropriate and when CWCB's instream flow rights are deemed by the Forest Service as adequate to protect National Forest resources, it will cooperatively work with the CWCB.

E36 Public Concern: The Forest Service should define its existing water rights.

Response: Determination of water rights owned by the United States on behalf of the USDA Forest Service is outside the scope of this analysis and is more appropriately addressed on a project-specific level. However, the Forest Service, represented by the U.S. Department of Justice, has historically participated extensively in the State of Colorado's various water right adjudications through the McCarran Amendment, Title 16 United States Code, Section 666.

E37 Public Concern: The Forest Service should address the potential impacts of Wild and Scenic River designations on water rights.

Response: Addressing the specific impact of individual Wild and Scenic River designations on privately held water rights, is outside the scope of this analysis and is more appropriately addressed during the Wild and Scenic suitability evaluation process. However, as a general proposition, those water rights needed for Wild and Scenic River purposes will typically have a priority date corresponding with the date of Congressional designation.

E38 Public Concern: Water and Riparian standard #10 in the draft forest plan should be revised to recognize reservoir release needs.

Response: Water and Riparian standard #10 is found in the 2002 Forest Plan, Chapter 2, *Water and Riparian Resources*. It states: "Manage water-use facilities to prevent gully erosion of slopes and to prevent sediment and bank damage to streams." Guidelines to this standard can be found in the Watershed Conservation Practices (WCP) Handbook (FSH 2509.25, Standard 12.6). This standard does not preclude the Forest Service from working with reservoir operators to ensure a balance between reservoir release needs and protection of stream health. Standard #10 was not revised for the FEIS because the standard is established in the WCP Handbook—hence, a Forest Service Region 2 directive that cannot be changed through the forest planning process.

E39 Public Concern: The Forest Service should prohibit motorized watercraft on reservoirs that supply drinking water.

Response: The Forest Service does not have authority to regulate motorized use on reservoirs within the White River National Forest—even if they supply drinking water. This authority lies with other federal and state agencies.

E40 Public Concern: Federal officials should not interfere with water resources in Colorado.

Response: The Forest Service recognizes and appreciates the importance of water resources, both in quality and quantity, to the State of Colorado and its citizens. At the same time, the Forest Service, under federal law, is required to protect and maintain national forest resources for multiple uses. The Forest Service is committed to working collaboratively with those with interests in water resources to alleviate conflicting national forest needs with existing uses. In addition, the Forest Service will address water resource issues in separate site-specific analyses if, where, and when necessary to fulfill its responsibilities under federal law.

E41 Public Concern: The Forest Service should recognize its authority to impose instream and bypass flows. – and –

E42 Public Concern: The Forest Service should ensure that stream flows are adequate to protect aquatic resources.

Response: The Forest Service recognizes its authority, under the Property Clause of the United States Constitution and various implementing statutes, to condition use of National Forest System lands to protect the natural resources under its management, including aquatic resources within its administrative boundaries. We also recognize that aquatic resource degradation has, in some streams, been due to water facilities that the agency allowed to be developed on National Forest System lands. The Forest is committed to collaboratively working with such water facilities to protect their interests, as well as downstream aquatic resources. Chapter 1 (*Goals and Objectives*) and Chapter 2 (*Forestwide Standards and Guidelines*) of the 2002 Forest Plan provide additional direction regarding streamflows and aquatic resources.

E43 Public Concern: The Forest Service should develop a program that bases permit applications for water use on watershed health.

Response: Special use permit proposals, including those for water use, are accepted based on guidance in the 36 CFR 251 regulations. These regulations require a screening process that includes compliance with the forest plan and current forest service policy. If the application is accepted, it must be reviewed through the NEPA process, including resource review (internal and external) of values potentially impacted (in the case of water use this would include fisheries, biological diversity, water quality, wildlife, and cultural resources). If the water use results in depletion of the resource, consultation must be also be done with the U.S. Fish and Wildlife Service.

Under the 2002 Forest Plan, we will continue to consider watershed health before any special use permit is accepted and/or conditioned. In addition, the watershed condition analysis identifies 6th-level watersheds where streamflows are important to existing or potential threatened and endangered fish (e.g., cutthroat trout). Additional protection of streamflow-dependent resources is provided in the 2002 Forest Plan.

E44 Public Concern: The Forest Service should adopt Alternative I to ensure the greatest level of stream protection.

Response: The relative contributions of Alternative I in protecting streams are addressed in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 2 – *Watersheds*.

E45 Public Concern: The Revised Forest Plan should include a reference to the Federal Multi-Agency Source Water Agreement.

Response: The Federal Multi-Agency Source Water Agreement has been added to Appendix CC (*Relevant Federal and State Statutes and Other Regulations*) of the 2002 Forest Plan.

E46 Public Concern: The Forest Service should address the effects of potential wildlife habitat management area designations on Denver Water's proposed Eagle-Piney project.

Response: This concern is outside the scope of this document and will be addressed on a project specific level.

E47 Public Concern: The Forest Service should allow Arapahoe Basin to Divert water from the Snake River.

Response: This concern is outside the scope of this document and will be addressed on a project specific level.

Water Quality

E48 Public Concern: The Forest Service should enforce the Clean Water Act, limit watershed degradation, and undertake site-specific actions to improve water quality. – and –

E49 Public Concern: The Forest Service should undertake site-specific actions to improve water quality.

Response: The Forest Service is required by law and guided by policy to protect water quality and watershed health. The legal and administrative framework that guides the Forest Service in protecting watershed resources is identified in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 2 – *Watersheds*. How we assess specific streams is outside the scope of the forest planning analysis and is more appropriately addressed on a project-specific level.

Standards for protecting watershed resources can be found in the 2002 Forest Plan, Chapter 2, *Water and Riparian Resources and Soils*. Further information regarding the guidelines (design criteria) supporting many of these standards can be found in the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25). A copy of the WCP Handbook can be found in the administrative record at the Forest Supervisor's Office.

None of the alternatives in the FEIS will change the amount of water storage on the Forest. Discussion of the adverse and beneficial impacts of water storage facilities is outside the scope of this analysis and more appropriately addressed through project-specific assessments. The impacts of travelways on sedimentation are discussed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 2—*Aquatic Resources*, as well as in Chapter 3, Topic 1, Part 1, Section 2—*Watersheds*. Analysis of timber harverst impacts (specific to the levels of allowable harvest under each alternative) can be found in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 2—*Watersheds*.

E50 Public Concern: The Forest Service should increase buffer zone size in wetland/riparian areas.

Response: The minimum protective width, as stated in the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25), is 100 horizontal feet or the mean height of mature dominant late-seral vegetation – whichever is greater. This area, known as the water influence zone (WIZ) in the WCP, includes adjacent unstable and highly erodible soils. The zone is intended to protect interacting aquatic, riparian and upland functions by maintaining natural processes and resilience of soil, water, and vegetation systems. In most cases, this amount of buffer is adequate; however, site-specific analyses during project-level planning may prescribe wider buffer areas as needed to protect watershed resources.

E51 Public Concern: The Forest Service should adopt Eagle County's Alternative Z in order to protect riparian health.

Response: The Forest Service agrees that riparian health is important. The standards for protecting riparian resources are identified in 2002 Forest Plan, Chapter 2, *Water and Riparian Resources*. The Forest Service developed a range of alternatives to meet different resource needs. All alternatives in the FEIS were evaluated for their relative

contribution to riparian area health. This analysis can be found in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 2 – *Watersheds*.

E52 Public Concern: Water and Riparian Resource standard #2 for Management Area Direction 8.25 should be deleted.

Response: While the Forest Service recognizes the authority of other government agencies (such as U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, and Colorado Department of Public Health and Environment) we must also comply with our own policies. For example, FSM 2520 outlines the objectives and policies that apply to watershed protection and management. FSM 2520 specifically addresses riparian area and floodplain management as well as wetlands protection. As such, we feel that a standard addressing stream channel impacts of snowmaking and other water depletions related to ski-based resorts is appropriate.

E53 Public Concern: The Forest Service should manage activities near wells to minimize impacts to human health.

Response: We agree that management activities near well sites must be conducted in a manner to protect ground water quality. The standards for protecting water quality, including ground water, are identified in the 2002 Forest Plan, Chapter 2, *Water and Riparian Resources*, Standards 11 through 13.

E54 Public Concern: The effects of forest management activities on groundwater should be addressed in the FEIS.

Response: We feel that the groundwater discussion in the FEIS adequately describes the potential impacts of forest management activities on groundwater. Standards and guidelines for protecting watershed resources from forest management activities are identified in the 2002 Forest Plan, Chapter 2, *Soils*, and *Water and Riparian Resources*.

E55 Public Concern: The 2002 Forest Plan should include quantifiable targets for stream conditions surveys.

Response: Strategy 1c.11 of the 2002 Forest Plan (Chapter 1) specifically states that 40 miles of known and potential cutthroat streams will be surveyed and assessed annually.

E56 The Forest Service should address the effects of sedimentation on municipal water supplies.

Response: We recognize the importance of protecting watersheds that supply public water systems. This includes avoiding sedimentation and high turbidity levels from management activities. Sediment control is addressed in several standards and guidelines in the 2002 Forest Plan, Chapter 2, *Soils*, Standards 1 through 4 and Guidelines 1, 3, and 4. To underscore the importance of protecting public supply watersheds, we have added text in FEIS (Volume 2, Chapter 3, Topic 1, Part 1, Section 2 – *Watersheds* and *Water Quality*) that addresses this concern.

Section 3—Air Resources

E57 Public Concern: The Forest Service should address the effects of emissions on biodiversity.

Response: Data collected from several air quality monitoring sites throughout the forest indicate that overall air quality is excellent. Additional information regarding these monitoring sites and the air quality constituents collected can be found in the Forest's Air Resource Management Plan located at the Supervisor's Office in Glenwood Springs or on the internet at: http://www.fs.fed.us/r6/aq/natarm/r2/documentr2.htm.

An analysis of regional air pollution is outside the scope of this document. Local impacts to air pollution from each alternative, however, are addressed in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 3 – *Air Resources*.

E58 Public Concern: The Forest Service should define baseline standards by which air quality is measured.

Response: The Colorado State Air Pollution Control Division has the primary responsibility for assessing National Ambient Air Quality Standards (NAAQS) compliance. By law, the Forest Service is required to mitigate activities that would cause air quality in an area to fall into non-compliance with NAAQ Standards. The impact of prescribed burns on air quality is discussed in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 3 – *Air Resources*. Federal and state policies require that all prescribed burns be planned and conducted to avoid the adverse impacts of smoke on population centers. Monitoring of prescribed burns is decided on a project specific level in cooperation with the Colorado State Air Pollution Control Division.

E59 Public Concern: The Forest Service should evaluate the air pollution generated by buses.

Response: The evaluation of exhaust from buses is outside the scope of this forest planning process. The impacts of bus use at specific sites within the White River National Forest will be addressed during site-specific planning analyses.

E60 Public Concern: The Forest Service should only apply Air Resources Guideline #2 to Class I Airsheds.

Response: We disagree with the recommendation that visibility standards for wilderness should apply only to Class I areas. Under the Wilderness Act of 1964 (16 USC. Sec. 1131), the Forest Service is required to protect wilderness resources including those that are sensitive to air pollution. The emphasis of the Clean Air Act, as amended (42 USC 7401 et seq.) on Class I wilderness in no way relinquishes or diminishes the Forest Service's responsibilities to comply with the terms of the 1964 Wilderness Act for ALL designated wilderness areas. As such, the Rocky Mountain Regional policy is that air quality related values are to be protected in all designated wilderness areas (see the Air Resources Management Plan for the White River National Forest available in the Supervisor's Office, Glenwood Springs, CO or on the web at http://www.fs.fed.us/r6/aq/natarm/document.htm.

E61 Public Concern: The Forest Service should address the effects of two-stroke engines on air quality, specifically snowmobiles.

Response: The Forest Service has no authority to regulate air quality impacts of two-stroke engines; this authority lies with the Environmental Protection Agency. However, specific air quality impacts resulting from snowmobile use are addressed in the FEIS Volume 2, Chapter 3, Topic 1, Part 1, Section 3 – *Air Resources*.

E62 Public Concern: The Forest Service should identify the environmental degradation rating system used for hazardous substance sites.

Response: The environmental degradation rating system (Strategy 2c.16 in the 2002 Forest Plan, Chapter 1) was established by the Colorado State Geological Survey (CSGS) for the abandoned mine inventory they began in the early 1990s. Strategy 2c.16 has been changed to better reflect the CSGS intent. For a list of abandoned mines inventoried on or adjacent to the White River National Forest, see FEIS Volume 4, Appendix J, Table J-3. This table includes the rating given to each abandoned mine on or adjacent to the Forest.

E63 Public Concern: The Forest Service should include a schedule for remediation of hazardous substance sites in the 2002 Forest Plan.

Response: A firm schedule for remediation of hazardous substance sites on the White River National Forest cannot be published in the 2002 Foret Plan. Funding for hazardous waste remediation projects is determined on an annual basis by the Regional Forester. Decisions are made in accord with priorities assigned to sites throughout Region 2 of the USDA Forest Service.

E64 Public Concern: The Forest Service should clarify the funding, define the terms used, and provide a listing of the hazardous substance sites that need to be rehabilitated.

Response: A list of known hazardous substance sites and their environmental degradation rating is provided in the FEIS Volume 4, Appendix J, Table 9. The 2002 Forest Plan does not contain references to multi-jurisdictional funding. Reference to such funding was an error in the draft planning documents.

E65 Public Concern: The Revised Forest Plan should identify mine reclamation schedules.

Response: Table J-9 (FEIS Volume 4, Appendix J) identifies the abandoned mine sites located on the White River National Forest as well as their environmental degradation rating. As stated under Strategy 2c.16 (2002 Forest Plan, Chapter 1), the Forest Service will prioritize these mine sites for reclamation. However, prioritization for reclamation does not guarantee that these abandoned mines will be treated, as funding is dependent upon regional and national priorities for cleanup. Of the 28 abandoned mines identified in Table J-9, 13 are located in 4th level watersheds identified under the Unified Watershed Assessment Program and/or the Colorado Department of Health's 303(d) list as high priority for restoration. Such prioritization is likely to influence funding of reclamation activity on abandoned mines. Current progress has been made on the Forest in acquiring funding to begin the process of treating mines located in the Snake River Basin.

Section 4—Mineral Resources

E66 Public Concern: The FEIS should more adequately address minerals.

Response: Oil and gas leasing, and the potential effects of development of these resources, were extensively evaluated in the *White River National Forest Oil and Gas Leasing EIS*, completed in 1993. Decisions made in the record for this EIS are not being reanalyzed for the 2002 Forest Plan.

In accordance with the Federal Onshore Oil and Gas Leasing Reform Act, analysis presented in the 1993 EIS included a review of leasing potential on the White River National Forest, and a description of stipulations as they apply to specific lands authorized for leasing. Alternatives in the Forest Plan FEIS could reallocate land and in some cases change the leasing authorization and stipulations. Additionally, new forest-wide standards and guidelines will be added. An analysis of effects on minerals, oil and gas leasing, including those associated with mineral withdrawals, can be found in FEIS Volume 2, Topic 1, Part 1, Section 4—*Mineral Resources*. Standards and guidelines can be found in Chapter 2 of the 2002 Forest Plan.

E67 Public Concern: The Forest Service should regard oil and gas development as loss of land base.

Response: Congress has deemed mineral and energy development as acceptable and desirable uses (The Mining and Mineral Policy Act of 1970) of National Forest System lands. Because mineral and energy development is directed by statute, there are laws and regulations in place to ensure proper and acceptable limits on development and rehabilitation. Although mineral development under existing law may result in a patented claim and removal of land from the public domain, oil and gas leases generally do not.

E68 Public Concern: Consultation with the US Fish and Wildlife Service should occur before any oil and gas leasing.

Response: Consultation with the US Fish and Wildlife Service is required prior to the Authorization Decision (Forest Plan) and project implementation (Application for Permit to Drill) to ensure that Forest Service actions will not jeopardize the continued existence of any listed species. Once the Authorization Decision has been made it contains the necessary stipulations to protect the species. Issuance of a lease is strictly the implementation of the Authorization Decision and does not authorize any ground disturbing activities. Because an Application for Permit to Drill (APD) with its associated Surface Use Plan of Opperations would authorize ground disturbing activities this becomes the next point at which impacts affecting the continued existence of a listed species could occur thus triggering consultation.

E69 Public Concern: Mining sites should be reclaimed to pre-occupancy standards. – and –

E70 Public Concern: The Forest Service should specify the types of restrictions mineral locators must operate under within each management area.

Response: Title 36, Section 228 of the Code of Federal Regulations govern the development and reclamation of National Forest System lands associated with mining activities. In addition, operations are governed by the Forest Plan standards and guidelines, as well as Federal laws including but not limited to the National

Environmental Policy Act, the Endangered Species Act, the Clean Air Act and the Clean Water Act.

E71 Public Concern: The 2002 Forest Plan should identify mine reclamation schedules.

Response: The White River national Forest has identified the priority watersheds for treatment in conjunction with other government agencies. Funding for each individual project is dependant on regional and national priorities for cleanup, therefore prediction of what may or may not be cleaned up during the planning horizon is difficult at best. Therefore, Appendix J (FEIS Volume 4) identifies the potential risks, and as money becomes available each site will be treated in accordance with the regional and national priorities.

E72 Public Concern: Mineral Resources Standard #1 should be deleted from the 2002 Forest Plan.

Response: As stated in the Introduction (2002 Forest Plan Chapter 2, Forest-Wide Standards and Guidelines), the forest-wide standards and guidelines apply to all areas of the forest, and are used in conjunction with those specific standards and guidelines found in each management prescription area. For example, management prescription 5.41 states under MINERAL AND ENERGY RESOURCES “These areas are available for oil and gas leasing with controlled surface use or timing restrictions.” If this is in conflict with the Oil and Gas Leasing EIS, then the FEIS for the Forest Plan will make the adjustment.

E73 Public Concern: The Forest Service should remove cabins built on mining claims.

Response: Administration of mining claims is an implementation subject, and is therefore outside the scope of this analysis. In addition, ownership and historical significance considerations come into play when evaluating these facilities. If the facility is not in compliance with an accompanying approved operating plan then there are administrative and law enforcement procedures in place to deal with these facilities and activities.

E74 Public Concern: The Forest Service should have higher reclamation objectives for mineral and energy operations.

Response: The draft objectives for mineral and energy operations were poorly worded and as such caused confusion. The objectives articulated in the 2002 Forest Plan were written with the intention to avoid confusion and provide clear direction.

E75 The Forest Service should expand the list of Management prescriptions areas withdrawn from mineral entry.

Response: Direction for evaluating National Forest System lands for withdrawel from mineral entry is found in FSM 2761. In addition to the conditions under which withdrawals might be considered, this manual direction lays out the numerous other alternatives that can be used to deal with specific areas and situations. Utilizing this information the Forest Plan ID team evaluated the need for withdrawing each management prescription area. The team determined that alternatives to withdrawal, coupled with standards and guidelines, could provide the necessary means to protect the associated values.

Part 2—Biological Diversity

General

E76 Public Concern: The Forest Service should use the best available biological science in its decision-making.

Response: Appropriate scientific literature and information was used during the development of the FEIS. The specialist reports for the biodiversity, wildlife, forested vegetation, and non-forested vegetation sections of the FEIS (Volume 2) contain extensive reference sections and are available for review in the administrative record in the Forest Supervisor's Office. Literature respective to all of these fields was reviewed and incorporated as applicable into the FEIS and 2002 Forest Plan revision processes.

E77 Public Concern: The final plan should include specific commitments to evaluate, accomplish viability studies, inventory, and map various biodiversity elements. – and –

E78 Public Concern: The Forest Service should consider that its viability studies are inadequate and need to be revised.

Response: We updated our viability assessment between the DEIS and FEIS. This viability assessment identifies needed studies, monitoring, and inventory necessary to maintain species viability for a wide range of terrestrial and aquatic vertebrate and invertebrate species as well as for plants. Direction necessary to assure continued species viability is included in the 2002 Forest Plan as objectives, strategies, standards, and guidelines in Chapters 1 and 2.

E79 Public Concern: The Forest Service should limit management area prescriptions to the final designated areas to prevent buffer zone management.

Response: Management area direction is specific to within the boundary of the individual management area; no buffer zone management is implied or allowed under the 2002 Forest Plan.

E80 Public Concern: The Forest Service should develop integrated conservation plans for all ecosystems on White River National Forest.

Response: This is outside the scope of the forest planning process. The Forest Plan provides guidance for all resource management activities on a national forest. The introduction section in Chapter 1 of the 2002 Forest Plan explains the basic decisions made in a forest planning process. The recommendations included in this public concern are better handled at the landscape planning level that will take place after the completion of the forest planning process.

E81 Public Concern: The FEIS should include a section on how the plan will benefit the Southern Rockies ecosystem.

Response: We address this issue whenever appropriate. The ecosystem level assessment discussions in FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 2 – *Ecosystem-level Assessment*, address how the forest ecosystems fit within the ecological sections and provinces. Management Prescription 5.5 (Forested landscape linkages) addresses the need for landscape connections for wide-ranging species such as forest carnivores.

E82 Public Concern: Human uses and activities should be restricted where damage to biodiversity can occur.

Response: The National Forest Management Act states that forest plans must "provide for the diversity of plant and animal communities based on the suitability and capability of the specific land area;" the Endangered Species Act governs protection of specified species and the ecosystems upon which they depend; and national forest ecosystem management policies directly and indirectly require us to maintain ecosystem function on National Forest System lands. The National Environmental Policy Act of 1970 requires that we study, develop, and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated. FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biological Diversity*, describes the process used to evaluate the alternatives and describe the impacts of the differing alternatives on the biological resources of the forest.

E83 Public Concern: The Forest Service should conduct population surveys in order to meet the viability requirements of the National Forest Management Act (NFMA).

Response: The National Forest Management Act states that forest plans must "provide for the diversity of plant and animal communities based on the suitability and capability of the specific land area." The Endangered Species Act and Forest Service Manual 2672.43 provide direction concerning the level of pre-project proposed, endangered, threatened, and sensitive (PETS) population and trend surveys into National Environmental Policy Act (NEPA) decisions. The NEPA process used by the Forest Service is a tiered process with project-specific NEPA occurring after a forest plan is approved. The majority of ground-disturbing activities is covered under this second tier of planning and is outside the scope of this forest planning process. The Biological Assessment and Biological Evaluation (FEIS Volume 4, Appendix N) displays current information about all PETS on the forest and the potential impacts from forest plan implementation. In addition, a separate viability assessment for species was completed and is included in the FEIS. Management direction was developed as a part of this assessment to guide us in the management of species determined to have viability concerns and is included in the 2002 Forest Plan (Chapters 1, 2, 3, and 4).

E84 Public Concern: The Forest Service should avoid a "one size fits all" approach in managing for biodiversity.

Response: Both spatial and temporal timeframes are integrated into the biodiversity assessment used in developing the DEIS and FEIS. The Historic Range of Variability assessment (summarized in the FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 1 – *Historic Range of Variability*, and in greater detail in the FEIS Volume 4, Appendix D – *Historic Range of Variability*) discusses spatial and temporal timeframes associated with vegetation composition and structure. The disturbance processes that shaped the forest are discussed here, and also in the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 3 – *Forested Vegetation*. Fire risk and hazard assessments for wildland fire situations are discussed in the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 7 – *Fire Management*. The landscape pattern assessment included on pages also discusses spatial and temporal changes to landscape pattern.

E85 Public Concern: Additional species should be included in the basis for biodiversity.

Response: We did not ignore any of the major cover types in its analysis, however, for some of these types there was insufficient information available to do landscape pattern analysis. The updated viability assessment the forest completed considered many of these less abundant cover types when analyzing species viability. We included the results of this improved assessment and recommended new direction concerning species viability and the needs for species and cover type inventory and monitoring in the FEIS and 2002 Forest Plan (see the viability discussion in the FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biodiversity* and related direction in Chapters 1 and 2 of the 2002 Forest Plan).

E86 Public Concern: The Forest Service should review the effectiveness of past management practices on the preservation of natural diversity before considering additional development.

Response: We prepared a Historical Range of Variability document to assess how recent forest management may have impacted ecological conditions that would be expected under natural disturbance regimes. This document is found as Appendix D in the FEIS and a summary is found in the FEIS Volume 2, Chapter 1, Topic 1, Part 2, Section 1 – *Historic Range of Variability*. Ecological considerations as a result of these landscape changes are presented as a portion of this assessment. Additionally, a fragmentation assessment of forest management activities is found in the FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 2 – *Ecosystem-level Assessment*. The wildlife assessment in the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial Wildlife*, also details past and expected future management impacts to wildlife species. The Biological Assessment and the Biological Evaluation found as FEIS Volume 5, Appendix N, details expected impacts of the forest plan on all federally listed threatened, endangered, and Forest Service sensitive species.

E87 Public Concern: The Forest Plan should analyze the cumulative effects of all factors that affect natural diversity.

Response: We analyzed cumulative impacts on all resource areas as part of implementing NEPA during the development of the FEIS and 2002 Forest Plan. This assessment was reanalyzed during the development of the FEIS and the revised discussions are found at the end of each resource area section in Chapter 3 of the FEIS Volume 2.

P88 Public Concern: The Forest Service should base its decisions on use of an up-to-date biological database and current ecological principles.

Response: The FEIS and 2002 Forest Plan preparers used the most up-to-date information available to them at the time of the analysis. The wildlife habitat maps included in the CDOW WRIS database and the element occurrence data found in the Colorado Natural Heritage database are generally considered to be the most current and informative databases for much of the wildlife habitat relationship information. These form the foundation for many of the habitat and species occurrence assessments made in the FEIS. There are a variety of opinions on which to base scientifically sound conservation-based management. We believe that we are using sound conservation principles in developing the FEIS and 2002 Forest Plan.

E89 Public Concern: The FEIS should include an effective monitoring plan.

Response: We reanalyzed the monitoring plan. An updated monitoring plan is included as a portion of Chapter 4 in the 2002 Forest Plan.

E90 Public Concern: The Forest Service should ban genetically modified organisms within the forest.

Response: We understand many of the concerns regarding the use of genetically modified organisms, but we feel that is it inappropriate to place total ban on their use at this time. Although many potential uses may not be appropriate, there are examples of uses that may be scientifically sound and environmentally safe for improving overall forest health. Properly used biological control agents for noxious weeds and sterile cultivars for erosion seeding are two potential examples of uses that can improve ecological conditions. Native plants and seeds are preferred in reseeding and re-vegetation efforts across the forest. Standard 1 and Guideline 1 under the forest-wide Biodiversity section in Chapter 2 of the 2002 Forest Plan both address this issue.

E91 Public Concern: The Forest Service should conduct an adequate fragmentation analysis.

Response: We reviewed our fragmentation approach and reanalyzed some portions of the assessment in the FEIS. There are many approaches to analyzing fragmentation and many parameters that can be used to describe aspects of fragmentation or perforation. The temporal approach suggested by one reviewer is one type of analysis that measures one point in time but fails to adequately take effects of disturbance ecology into account. We matched reference landtype associations with managed areas to determine the impacts of recent management on a range of forested landscapes pattern descriptions. We feel that the methodology used in the DEIS and modified in the FEIS is adequate rigor to analyze the decisions required in a forest plan. The impacts of forest roads on wildlife species is analyzed in the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial Wildlife*.

E92 Public Concern: The Forest Service should consider the effects of fire management on biodiversity.

Response: Fire ecology and its relationship to the major cover types on the forest is discussed in FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 1 – *Historic Range of Variability*. FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 7 – *Fire Management*, discusses the role of fire in management of the White River National Forest. This information has been incorporated into the overall management goals and objectives for these cover types throughout the FEIS and 2002 Forest Plan.

E93 Public Concern: White River National Forest should restrict logging in order to sustain biodiversity.

Response: See response number E147. Additionally, various laws require the Forest, including the National Environmental Protection Act, the National Forest Management Act and the Endangered Species Act, to maintain biological values across the forest. The range of alternatives in the FEIS evaluated differing levels and areas appropriate for logging actions and restrictions across the forest. Activities are addressed as impacts to biodiversity, including using logging as a tool to enhance biodiversity values. Beginning in the FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biodoversity*, the impacts from

logging and other management activities to landscape pattern, composition, and function are discussed. The other physical and biological sections of the FEIS also discuss impacts of logging within the various alternatives on their respective resource areas.

E94 Public Concern: The Forest Service should not use timber harvest as a surrogate for naturally occurring fire.

Response: Fire is recognized as an important disturbance agent that has shaped many of the forest's ecosystems. The continued presence and use of both prescribed and wildland fire as management tools is recognized and assessed in the FEIS Volume 2, Chapter 3, Topic 1, Parts 2 and 3. Assessments of which management tools and techniques, including fire and logging, should be used to manage the Forest were evaluated in a wide range of alternatives. These assessments included social, economic, and ecological concerns.

Section 1—Historic Range of Variability

E95 Public Concern: The Forest Service should identify levels of timeframes for biodiversity protection.

Response: The Historic Range of Variability (HRV) assessment (FEIS Volume 4, Appendix D) was developed to establish the biodiversity conditions of composition, structure, and function that occurred prior to landscape changes perpetrated by modern industrial developments. Current conditions were compared to the HRV to assess the impacts of the past 130 years of human developments. The various alternatives were assessed against the HRV and current conditions to determine how biodiversity elements would be affected in the future by implementation. An analysis of landscape pattern characteristics is found in the FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 2 – *Ecosystem-level Assessment*.

E96 Public Concern: The Forest Service should avoid using the Historic Range of Variability (HRV) when dealing with modern issues.

Response: The Historic Range of Variability (HRV) assessment (summarized in the FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 1 – *Historic Range of Variability*, and in greater detail in FEIS Volume 4, Appendix D – *Historic Range of Variability*) is a component of the landscape level assessment and compares expected conditions of natural ecosystems without interference by modern humans with existing conditions. Major human-induced ecological changes are an integral part of this assessment and are discussed in the HRV.

E97 Public Concern: The Forest Service should use natural disturbance processes, as stressed in Alternative I, to achieve HRV goals.

Response: The Historic Range of Variability (HRV) assessment (FEIS Volume 4, Appendix D) was developed to establish the biodiversity conditions of composition, structure, and function that occurred prior to landscape changes initiated by modern, industrial developments. Current conditions were compared to the HRV to assess the impacts of the past 130 years of human developments. The effects of implementing various alternatives were assessed against the HRV and current conditions to determine how biodiversity elements would be affected by implementation. The effects of using a wide range of tools, including letting natural processes predominate, were assessed for these alternatives. Approximately half of the forest will continue to be managed largely

by natural processes due to the allocation of management area prescriptions such as wilderness, recommended wilderness, research natural areas, non-motorized, and wild and scenic rivers. Additionally, much of the rest of the forest will have limited active management associated with the 2002 Forest Plan and will be managed largely through natural disturbances.

Section 2—Ecosystem-level Assessment

E98 Public Concern: The Forest Service should protect biological diversity. – and –

E99 Public Concern: The Forest Service should protect biological diversity by preventing fragmentation.

Response: The forest has a high level of natural patchiness or fragmentation resulting from natural topographic, geologic and environmental conditions, as well as due to past natural disturbances such as fire and insects outbreaks. A certain level of fragmentation is desirable for meeting the habitat needs of various native species, including species associated with early successional seral vegetation and species dependent upon disturbance events to provide suitable habitat. Many of the wildlife species associated with central Colorado, including the White River National Forest, have adapted to natural, patchy habitat conditions. A range of alternatives was analyzed that varied in the types of activities that might affect natural habitat fragmentation. Several of the alternatives, Alternatives D, I and K in particular, stress management that replicates Historic Range of Variability conditions, including patch size, shape and arrangement on the landscape. FEIS Volume 2, Chapter 3, Topic 1 – *Physical Elements*, describes the results of implementing each alternative on fragmentation and landscape pattern characteristics.

E100 Public Concern: The Forest Service should protect biodiversity and diminish habitat fragmentation by creating migration corridors across transportation routes.

Response: The 2002 Forest Plan provides standards and guidelines to manage for migration across the landscapes on National Forest System (NFS). While the Forest Service cannot prescribe actions on non-NFS lands, the actions on these lands were considered in developing prescriptions for migration and corridors on the forest to minimize or mitigate the impacts of fragmentation. The FEIS presents the comparison of alternatives' impacts to fragmentation in its discussion of interior forests and connectivity.

Additionally, we have modified Management Prescription 5.45, found in the DEIS and draft forest plan, to include the needs of a wider range of wildlife species. This new Management Prescription 5.5 (Forested landscape linkages) incorporates the concept of migration corridor protection for specific areas of the forest.

E101 Public Concern: The FEIS should include a comparison of the fragmentation analysis with those conducted elsewhere in the Rocky Mountains.

Response: We have reviewed our fragmentation analysis and stands by its findings. There are many differences between the levels of management that have occurred on the various forests in Region 2, including the scale and scope of the past timber sale and road building programs. Timber harvest activities on the White River have affected less than

7% of the entire forest over the past 60 years. The results of this relatively low level of management are documented in the fragmentation findings. The fragmentation assessment in the FEIS documented a very wide range of variability in landscape pattern characteristics on the forest, which likely masks any significant impacts resulting from past timber sale activity. The wildlife assessment includes an analysis of the potential impacts from past roading to wildlife habitats.

E102 Public Concern: The timber fragmentation analysis should analyze 100% of past timber activity rather than only a sample.

Response: We consider the analysis of fragmentation resulting from recent timber management activities a "worst case" analysis as the areas with the most intensive harvest activities were chosen for the analysis. Over 40% of the past timber management activities on the forest are covered by the analysis of the 13 polygons identified in the FRAGSTATS assessment. Many portions of the forest have very scattered stands of timber that have been managed over the past 60 years and analysis of these areas would be impractical and not result in useable information. With limited numbers of managed patches over broad landscapes, the natural variability would mask any potential impacts resulting from past forest management activities.

E103 Public Concern: The Forest Service should establish a system of core reserve areas to protect biodiversity.

Response: There are many different methods of accomplishing the goal of maintaining biological diversity. We feel that proper management of the overall matrix to maintain important values to a wide range of species is the best method of meeting the diversity of goals placed on National Forest System lands. This is displayed in the direction package associated with the 2002 Forest Plan. We feel that management allocations in Alternative K meet the diverse resource demands being placed on the forest.

However, we also recognize the values of relatively undisturbed lands such as wilderness areas, roadless areas, and landscape linkage areas as evidenced by the 1.11, 1.12, 1.13, 1.2, 1.31, 2.2, and 5.5 management areas in Alternative K. These prescriptions make up approximately half of the entire acreage in Alternative K.

E104 Public Concern: The Forest Service should consider the compatibility of overlapping and adjacent management area prescriptions.

Response: The respondent specifically addressed issues associated with the 5.43 management area on the forest. We have identified the intent of each of the 5.43 management areas for each of the alternatives to better define the appropriate seasonal restrictions to be applied to protect elk habitat values. This information is included in the tables and narrative description of Management Area 5.43 in Chapter 3 of the 2002 Forest Plan. The resondent specifically requested that the 5.43 prescription be amended to include aerial transportation where all standards and guidelines are being met. This is unnecessary; if all standards and guidelines are met and the proposed activity meets the intent of the management area desired conditions, additional activities can be analyzed under NEPA for possible implementation.

E105 Public Concern: The Forest Service should collaborate across administrative boundaries to manage for biodiversity.

Response: The FEIS and 2002 Forest Plan are specific to the management of the White River National Forest. We do feel that it is important to maintain close working relationships with other federal, state, and county land management agencies, and we have worked with these cooperators in the preparation of the FEIS and the 2002 Forest Plan. Much of the basic data concerning wildlife populations was obtained from the Colorado Division of Wildlife. We have worked closely throughout the preparation of the FEIS with the U.S. Fish and Wildlife Service to assure that the needs of threatened and endangered species have been adequately addressed. Goals, objectives, and strategies for maintaining these cooperative working relationships are found in the 2002 Forest Plan.

E106 Public Concern: The Forest Service should address the inadequacy of the DEIS in ensuring species viability.

Response: The viability assessment for the FEIS and the 2002 Forest Plan has been revised. A description of the viability process can be found in FEIS Volume 4, Appendix B. The information resulting from this revision has been incorporated into forest plan direction as appropriate in Chapters 1 and 2 (2002 Forest Plan) to assure that we maintain species viability as required under 36 CFR Section 219.10.

E107 Public Concern: The Forest Service should adopt an alternative that prevents habitat fragmentation.

Response: The forest has a high level of natural patchiness or fragmentation resulting from natural topographic, geologic, and environmental conditions, as well as due to past natural disturbances such as fire and insect outbreaks. A certain level of fragmentation is desirable for meeting the habitat needs of various native species, including species associated with early successional seral vegetation and species dependent upon disturbance events to provide suitable habitat. Many of the wildlife species associated with central Colorado, including the White River National Forest, have adapted to natural, patchy habitat conditions. A range of alternatives was analyzed that varied in the types of activities that might affect natural habitat fragmentation. Several of the alternatives, Alternatives D, I, and K in particular, stress management that replicates Historic Range of Variability conditions, including patch size, shape, and arrangement on the landscape. The FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 2 – *Ecosystem-level Assessement*, describes the results of implementing each alternative on fragmentation and landscape pattern characteristics.

Section 3—Species-level Assessment

E108 Public Concern: The FEIS should explain the assumptions it used in viability assessments and to determine the amount of suitable habitat on the forest.

Response: The viability assessment for the forest has been completely revised. The FEIS and 2002 Forest Plan incorporate the results of the new viability assessment. The viability process is explained in Appendix B of the FEIS. Management direction for the species identified as species of viability concern is found in the 2002 Forest Plan in Chapters 1, 2, and 3.

E109 Public Concern: The Forest Service should address the impacts of timber management on the availability of downed woody debris.

Response: The impact of past forest management on downed woody debris is discussed in the FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *B iodiversity*. The Historic Range of Variability section (FEIS Volume 4, Appendix D) documents that some areas of the Forest have reduced volumes of snags and dead and down material as a result of past timber management. Timber management impacts to dead and downed woody material are also discussed in the *Terrestrial Wildlife* and *Forested Vegetation* sections of the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Sections 1 and 3 (respectively). In addition, standards and guidelines specific to the retention of downed logs and snags are included in the 2002 Revised Forest Plan (Chapter 2, Section 1 – *Physical*, Soils, Guideline 5; and Chapter 2, Section 2 – *Biological*, Biodiversity, Table 2-1) and in the lynx strategies, standards and guidelines specific to denning habitat (2002 Forest Plan Chapter 1, lynx Strategies 1c.5 and 1c.6; Chapter 2, lynx Standards 1, 2, 3, and 4; and Chapter 2, lynx Guideline 3).

E110 Public Concern: The Forest Service should meet the regulatory standards and requirements with regard to threatened and endangered species.

See responses numbers E111 and E112.

E111 Public Concern: The Forest Service should protect Wilderness in order to preserve endangered species habitat.

Response: The National Environmental Policy Act (NEPA), the National Forest Management Act, the Endangered Species Act and national forest policy either directly or indirectly require the Forest to maintain biodiversity, including threatened, endangered, and sensitive species on National Forest System lands. NEPA requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated providing varying levels of protection for ecosystem components that provide for biodiversity. These alternatives include differing amounts of recommended Wilderness. Potential impacts from a wide range of activities were analyzed for their possible impacts to biodiversity. The Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N) discuss the potential impacts of alternative implementation on threatened, endangered and sensitive species.

Although wilderness can provide some aspects of protection for wildlife, other management prescriptions also provide active and passive management to meet wildlife habitat needs. Management areas 1.2, 2.1, 2.2, 3.1, 5.4, 5.41, 5.42, 5.43, and 5.5 all provide significant wildlife habitat for a wide range of species.

E112 Public Concern: The Forest Service should cooperate with State Agencies in protection of Threatened and Endangered species habitat.

Response: The Endangered Species Act of 1973 provides direction for the management of threatened, endangered or proposed species on federal lands. Forest Service Manual 2670 provides direction for the identification and management of sensitive species on National Forest System lands. Forest Service sensitive species direction was developed to ensure that species for which there may be concerns are managed in such a way that those species do not trend toward threatened or endangered status because of Forest Service

activities. Forest Service Handbook 2672.24b provides direction for the coordinated recovery efforts between the Forest Service and appropriate state and federal agencies for fish, wildlife and plants. The Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N) discuss the potential impacts of alternative implementation on threatened, endangered and sensitive species.

E113 Public Concern: The Forest Service should restrict human intrusions and activities in Threatened and Endangered species habitats.

Response: The Endangered Species Act of 1973 provides direction for the management of threatened, endangered, or proposed species on federal lands. Forest Service Manual 2670 provides direction for the identification and management of sensitive species on National Forest System lands. The Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N) discuss the potential impacts of alternative implementation on threatened, endangered and sensitive species. The planning process used by the Forest Service is a tiered process with project-specific analysis occurring after a forest plan is approved. Project-specific ground-disturbing activities that may impact threatened, endangered, or sensitive species are outside the scope of the forest planning process.

E114 Public Concern: White River National Forest should only manage for Threatened and Endangered species that occur within National Forest boundaries.

Response: The Endangered Species Act of 1973 provides direction concerning the management of federal lands for threatened, endangered, or proposed species. Section 7(a)2 of the Endangered Species Act states, "Each federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species." Any federal actions that affect listed species, regardless of whether that species occurs on National Forest System lands, must meet the intent of Section 7(a). In addition, the US Fish and Wildlife Service has already determined that any activity on the Forest resulting in water depletion within the upper Colorado River Basin constitutes jeopardy to the four federally-listed big river fish. The Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N) discuss the potential impacts of forest plan implementation on all federally listed threatened, endangered and proposed species.

E115 Public Concern: The Forest Service should reintroduce once-native species. – and –

E116 Public Concern: The Forest Service should not introduce Grizzly Bears or Wolves. – and –

E117 Public Concern: Lynx reintroduction should be evaluated.

Response: The National Environmental Policy Act (NEPA), the National Forest Management Act, the Endangered Species Act and national forest policy all, either directly or indirectly, require the Forest to maintain biodiversity values for all native and desirable non-native species on National Forest System lands. The Forest Service is responsible for the management of habitats, while the Colorado Division of Wildlife is

responsible for the population management of wildlife species. The US Fish and Wildlife Service is responsible for population management of migratory birds and federally listed threatened, endangered and proposed species. The Forest Service does not have the authority to manage populations of wildlife species, including reintroductions.

E118 Public Concern: The Forest Service should provide documentation that suitable Lynx habitat exists on White River National Forest.

Response: Historically, the Forest supported lynx individuals and likely breeding populations. The historic record documents specimens from throughout the Forest with the highest number of records and sightings located in a triangle roughly framed by Leadville, Aspen and Vail. The most recent, confirmed native lynx specimen for the state was an individual trapped on the front side of Vail Ski Area in 1973. More recent, unconfirmed reports have come from several other parts of the Forest. Several of the lynx reintroduced in the state by the Colorado Division of Wildlife have spent considerable time on the Forest over the past two years. Based on the habitat relationships identified in the most recent lynx literature, *Ecology and Conservation of Lynx in the United States* (1999) and the *Lynx Conservation Assessment and Strategy* (2000), the Forest currently contains a large amount of suitable lynx habitat and additional acreage is capable of providing habitat, but is not currently in suitable condition. To meet the intent of Section 7(a) of the Endangered Species Act of 1973, direction included in these new documents will be incorporated into the Biological Assessment (FEIS Volume 5, Appendix N) and FEIS as appropriate.

E119 Public Concern: Habitat fragmentation should be avoided in Lynx habitat. – and –

E120 Public Concern: The Forest Service should expand protection of lynx habitat. – and –

E121 Public Concern: The Forest Service should provide documentation of lynx habitat improvement plans. – and –

E122 Public Concern: The Forest Service should identify effective techniques for forest carnivore habitat improvement. – and –

E123 Public Concern: The FEIS should discuss the role of saplings in the ecosystem.

Response: During development of the DEIS, we used the best information available to evaluate management techniques and direction for lynx and wolverine. However, two new reports, *Ecology and Conservation of Lynx in the United States* (1999) and the *Lynx Conservation Assessment and Strategy* (2000), have been published since the release of the DEIS. The information included in these documents was incorporated, as appropriate, into the Biological Assessment (FEIS Volume 5, Appendix N), the FEIS and management direction included in the 2002 Forest Plan. This direction can be found in the 2002 Forest Plan Chapter 1 – *Strategies*, Chapter 2 – *Standards and Guidelines*, Chapter 3 (Management Area 5.5), and Chapter 4 – *Monitoring*.

E124 Public Concern: The Forest Service should identify correctly that the peregrine falcon is no longer endangered.

Response: The peregrine falcon was delisted as an endangered species on August 25, 1999, after the release of the DEIS. The FEIS documents the status change for this species.

E125 Public Concern: The Gypsum Creek Forest Carnivore area should be expanded to the top of the Red Tables.

Response: The 5.45 management areas (MA) have been reviewed for Alternative K. This management area has been modified and many of the goals and objectives of the 5.45 MA have been incorporated into a new MA, 5.5 (Forested landscape linkages). The 5.5 MA was developed to meet the landscape level movements of species requiring forested landscapes including lynx and wolverine. In Alternative K, all Forest Carnivore areas were reviewed to see if this new management prescription was appropriate as a replacement for 5.45. The Gypsum Creek area was felt to be more appropriate as a 1.2 management area in Alternative K.

E126 Public Concern: The Forest Service should restrict category III expansions until Lynx and small mammal surveys are completed.

Response: The Vail Category III decision was a separate, site-specific decision. Actions authorized in the Vail Category III Record of Decision are outside the scope of this forest planning process.

E127 Public Concern: The Forest Service should extend the management area 5.45 boundary to provide snowshoe hare habitat and connecting corridors.

Response: The 5.45 management area (MA) has been modified and many of the goals and objectives of MA 5.45 have been incorporated into a new MA, 5.5 (Forested landscape linkages). The 5.5 MA was developed to meet the landscape level movements of species requiring forested landscapes including lynx and wolverine. Management within many management areas including 5.5 will provide for the needs of snowshoe hare. Application of MA 5.5 in Alternative K was based on the best information available from the Forest, the Colorado Division of Wildlife and the US Fish and Wildlife Service about the most important landscape linkage areas associated with the White River National Forest.

E128 Public Concern: The Forest Service should include monitoring standards and guidelines for ensuring the protection of threatened and endangered plants.

Response: The viability assessment for the Forest has been revised. This revised assessment includes plants and identifies the management direction, including monitoring, necessary to maintain species viability across the Forest. The Forest has revised it monitoring needs for all resource areas. This revised monitoring plan is included in the 2002 Forest Plan as Chapter 4. Additional information concerning individual federally-listed or sensitive species can be found in the Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N).

E129 Public Concern: The Forest Service should revise objective 1.1a.

Response: The entire Goals and Objectives sections of the 2002 Forest Plan (Chapter 1) have been rewritten.

E130 Public Concern: The Forest Service should assess the ecological role of roadless areas to provide habitat for threatened and endangered species.

Response: There are many different methods of accomplishing the goals of maintaining biological diversity and protecting threatened and endangered species. The Forest feels that proper management of the overall habitat matrix to maintain important values to a wide range of species is the best method of meeting the diversity of goals placed on National Forest System lands. This is displayed in the allocation of the Management Areas in Alternative K. However, the Forest also recognizes the importance of Wilderness, roadless, and landscape linkage areas as evidenced by the 1.11, 1.12, 1.13, 1.2, 1.31, 2.2, and 5.5 Management Areas in Alternative K. These prescriptions make up approximately ½ of the entire acreage of the White River National Forest in Alternative K.

E131 Public Concern: White River National Forest should ensure that its final Plan is consistent with recent revisions to other National Forest Plans in Colorado regarding lynx management.

Response: The Forest has worked closely with the US FWS and the Forest Service Region 2 team working on the amendment to the other forest plans. The White River National Forest will be the first to incorporate lynx direction into its plan.

E132 Public Concern: The Forest Service should address if utility corridors in forest carnivore management areas are consistent with the management prescription.

Response: Although utility corridors transect many different management areas, they remain a separate designation. All utility corridors mapped in the FEIS and 2002 Forest Plan contain currently existing facilities and structures on the land. The Forest manages facility construction and maintenance activities associated with the operation of facilities within these corridors. Mitigation necessary for the protection of the values of the areas through which these corridors pass will be a requirement of their continued operation.

E133 Public Concern: The final plan should ensure conservation of threatened or endangered species.

Response: The Forest has revised it viability assessment and included the direction from this updated assessment into the 2002 Forest Plan. This revision of the viability assessment included revising the Biological Assessment for threatened and endangered species and the Biological Evaluation for Forest Service sensitive species. Both revised documents can be found in FEIS Volume 5, Appendix N.

E134 Public Concern: The Forest Service should conduct formal consultation with the U.S. Fish and Wildlife Service in order to comply with the Endangered Species Act.

Response: The Forest has worked diligently with the U.S. Fish and Wildlife Service to assure that all federally-listed species are adequately protected from impacts associated the adoption and implementation of the 2002 Forest Plan. This coordination includes a formal consultation under the Endangered Species Act. The Biological Assessment addressing federally listed threatened and endangered species is included in FEIS Volume 5, Appendix N.

E135 Public Concern: The acreage allotted for forest carnivore management areas should be increased and road densities reduced.

Response: Colorado is not included within the recovery areas identified by the U.S. Fish and Wildlife Service for gray wolf. There is no legal requirement for the White River National Forest to manage habitats for wolves. Additionally, see the response to E115, above.

E136 Public Concern: The Forest Service should prohibit use of lethal traps within lynx habitat.

Response: The citizens of the state of Colorado voted in 1996 to make the use of leghold traps illegal except under very tight restrictions. The use of leg hold traps by private individuals is illegal on National Forest System lands. Also, see the responses to E159, E121, and E131, above.

E137 Public Concern: The Forest Service should clarify the role of logging and fire on Mexican spotted owls.

Response: The direction in the 2002 Forest Plan reflects recommendations from the Mexican Spotted Owl Recovery Plan and other scientific documents. Catastrophic fire has been identified as a major risk for the MSO because of increasing fuel levels in some of its range. Any actions proposed in MSO habitat will, because of the 2002 Forest Plan direction and through consultation with the USFWS, result in maintaining the necessary habitat characteristics for MSO reproduction and survival (see FEIS Volume 5, Appendix N – *Biological Evaluation*).

Region 2 Sensitive Species

E138 Public Concern: The Forest Service should revise species designation listings.

Response: Forest Service Handbook 2672.11a provides direction concerning the listing of species as sensitive on the Regional Forester's official list. This process was used to develop the Region 2 Sensitive Species List (Forest Service Manual Supplement 2600-94-2). Changes to this list are outside the scope of the forest planning process. The Region 2 list was used to develop a Forest-wide list of species that are known or believed to occur on the Forest. The Biological Evaluation (FEIS Volume 5, Appendix N) was developed using this list of species.

There is disagreement between authorities on whether mountain goats were native to Colorado, but the Forest Service is directed to maintain viable populations of existing native and desired non-native plant, fish and wildlife species (Forest Service Manual 2622.01). The State and Forest Service may cooperatively develop management plans for specific species if necessary, but the 2002 Plan does not include specific management direction for mountain goats.

E139 Public Concern: The Forest Service should address distribution discrepancies in Appendix N.

Response: The distribution information used to develop the Biological Assessment (BA) and Biological Evaluation (BE) (both documents can be found in FEIS Volume 5, Appendix N) was the most up-to-date information known to the authors at the time. The Colorado Natural Heritage Program is the primary database manager for rare and imperiled species distribution information. Their database was used as the primary data

source for the development of the DEIS. New information provided by respondents that was not available in that database was reviewed and added to the BE and FEIS as appropriate.

E140 Public Concern: The Forest Service should discuss Osprey nesting habitat on the Blanco District.

Response: The Forest has not documented nesting by osprey on the Blanco District, but the BE discusses how forest management activities authorized under the Forest plan would affect nesting osprey anywhere on the Forest.

E141 Public Concern: The Forest Service should develop improved criteria for adding species to the sensitive list.

Response: Forest Service Handbook 2672.11a provides direction concerning the listing of species as sensitive on the Regional Forester's official list. This process was used to develop the Region 2 Sensitive Species List (Forest Service Manual Supplement 2600-94-2). Changes to this list are outside the scope of the forest planning process. The Region 2 list was used to develop a Forest-wide list of species that are known or believed to occur on the Forest. The Biological Evaluation (FEIS Volume 5, Appendix N) was developed using this list of species.

E142 Public Concern: The Forest Service Plan should take a more protective stance toward sensitive species and make commitments for more surveying and monitoring. – and –

E143 Public Concern: The Forest Service should more adequately address the viability of sensitive plants. – and –

E144 The FEIS should include an assessment of the effects of grazing on sensitive plants. – and –

E145 Public Concern: The Forest Service should include standards that ensure the viability of sensitive mammals. – and –

E146 Public Concern: The Forest Service should more adequately address the viability of sensitive birds and their habitat.

Response: A viability analysis process was used to identify species of viability concern and those species needing additional information to determine viability status. Additional and edited direction was included in the 2002 Forest Plan (Chapters 1, 2 and 3) to address the viability needs of species if other non-species specific direction did not adequately address viability. The Biological Evaluation addressing all Region 2 Sensitive Species that occur on the Forest has been updated and included in the Biological Evaluation (FEIS Volume 5, Appendix N). Species identified as exhibiting viability concern, and as needing more information to determine status, are addressed in the FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*. The Biological Evaluation and Species-level assessment display the impacts of implementing the 2002 Forest Plan on the life history and habitat needs of each species. Chapter 4 – *Monitoring*, (2002 Forest Plan) has been revised and includes monitoring requirements for threatened, endangered, sensitive, and species of viability concern, which may in the future identify additional direction necessary to manage a species.

Part 3—Biological Elements

General

E147 Public Concern: White River National Forest should identify and protect critical ecosystem functions.

Response: The National Forest Management Act states that forest plans must "provide for the diversity of plant and animal communities based on the suitability and capability of the specific land area;" the Endangered Species Act governs protection of specified species and the ecosystems upon which they depend; and national forest ecosystem management policies directly and indirectly require the Forest to maintain ecosystem function on National Forest System lands. The National Environmental Policy Act of 1970 requires that we study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated. FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biological Diversity*, describes the process used to evaluate the alternatives and describe the impacts of the differing alternatives on the biological resources of the Forest.

E148 Public Concern: The FEIS should restrict motorized vehicles in order to prevent environmental degradation.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated, including impacts from motorized vehicle uses. The most recent literature concerning motorized impacts was reviewed and used to assess the impacts of motorized vehicle use on biological and physical resources. Use restrictions in the 2002 Forest Plan will be based on the results of these assessments and the needs and requirements to protect physical and biological elements across the Forest. Capacities, safety considerations, user conflicts, law and use trends were also assessed. The decisions regarding motorized use will be included in the site-specific Travel Management Plan.

Impacts of mechanized uses on biological and physical resources were evaluated during the development of the DEIS and FEIS. Restrictions on mechanized uses in the 2002 Forest Plan will be based on the results of these assessments and the needs and requirements to protect the physical and biological elements across the Forest. Mechanized recreation uses, such as mountain biking, are a relatively new phenomenon. Limited impact studies specific to mechanized uses have been written; however, none are specific to the impacts of mechanized use on wildlife. Impacts on wildlife were inferred from similarities between mechanized uses and horse and foot travel, coupled with the increased daily range of a mechanized user over these other types of uses. Capacities, safety considerations, user conflicts, law and use trends were also assessed. The decisions regarding motorized and mechanized uses will be included in the site-specific Travel Management Plan.

E149 Public Concern: The Forest Service should demonstrate mountain biking has less of an effect on wildlife and the environment than other uses.

Response: Impacts of mechanized uses on biological and physical resources were evaluated during the development of the DEIS and FEIS. Restrictions on mechanized uses in the 2002 Forest Plan are based on the results of these assessments and the needs and requirements to protect the physical and biological elements across the Forest. Mechanized recreation uses, such as mountain biking, are a relatively new phenomenon. Limited impact studies specific to mechanized uses have been written. Management recommendations from other Federal agencies (BLM) and mountain bike groups (International Mountain Bicycling Association) were considered in making decisions concerning restrictions for mechanized uses. Impacts on wildlife were inferred from similarities between mechanized uses and horse and foot travel, coupled with the increased daily range of a mechanized user over these other types of uses. Capacities, safety considerations, user conflicts, law and use trends were also assessed. The decisions regarding motorized and mechanized uses will be included in the site-specific Travel Management Plan that will be completed shortly after the completion of the FEIS and 2002 Forest Plan.

E150 Public Concern: The Forest Service should demonstrate that motorized use has less of an environmental impact than other uses.

Response: Appropriate scientific literature and information was used during the development of the FEIS. The specialist reports for the biodiversity, wildlife, forested vegetation and non-forested vegetation sections of the FEIS contain extensive reference sections and are available for review in the administrative record in the Forest Supervisor's Office. Literature respective to all of these fields will continue to be reviewed and incorporated as applicable into the FEIS and 2002 Forest Plan processes.

E151 Public Concern: The Forest Service should consider that domestic grazing does more damage to the forests and animal habitat than motorized vehicles.

Response: During the development of the FEIS and 2002 Forest Plan, inconsistencies between the Proposed 2002 Forest Plan and the Forest Service Manual (FSM) regarding sensitive species maintenance requirements were reviewed and modified as appropriate to meet the intent of FSM 2670.

E152 Public Concern: The Forest Service should consider that Alternative D inadequately accounts for the resiliency of the environment.

Response: The National Forest Management Act states that forest plans must "provide for the diversity of plant and animal communities based on the suitability and capability of the specific land area;" the Endangered Species Act governs protection of specified species and the ecosystems upon which they depend; and national forest ecosystem management policies directly and indirectly require the Forest to maintain ecosystem function on National Forest System lands. The National Environmental Policy Act of 1970 requires that we study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated. FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biological Diversity*, describes the process used to evaluate the alternatives and describe the impacts of the differing alternatives on the biological resources of the Forest.

E153 Public Concern: In the final EIS, under each alternative, the Forest Service should show quantitative changes rather than qualitative changes.

Response: The Forest reevaluated all the alternatives and used as much quantitative comparison of the alternatives as possible in the FEIS. Where quantitative information was unavailable, the Forest used qualitative assessments.

E154 Public Concern: The effects of travel on all environmental resources should be included in the FEIS.

Response: Current scientific literature was reviewed concerning the impacts of motorized and mechanized use impacts to wildlife. Recommendations from four major literature review efforts concerning these possible impacts (*Wildlife and Recreationists*, edited by Knight and Gutzwiller; *Effects of Recreation on Rocky Mountain Wildlife*, Edited by the Montana Wildlife Society, *The Environmental Impacts of Recreation*, edited by the Biodiversity Legal Foundation, and *Effects of Winter Recreation on Wildlife of the Greater Yellowstone Area: a Literature Review and Assessment*) were reviewed and used in the wildlife, recreation, travel management, and landscape pattern analyses of the FEIS and incorporated into management direction for the 2002 Forest Plan.

Impacts of mechanized uses on biological and physical resources were evaluated during the development of the DEIS and FEIS. Restrictions on mechanized uses in the 2002 Forest Plan will be based on the results of these assessments and the needs and requirements to protect the physical and biological elements across the Forest. Mechanized recreation uses, such as mountain biking, are a relatively new phenomenon. Limited impact studies specific to mechanized uses have been written; however, none are specific to the impacts of mechanized use on wildlife. Impacts on wildlife were inferred from similarities between mechanized uses and horse and foot travel, coupled with the increased daily range of a mechanized user over these other types of uses. Capacities, safety considerations, user conflicts, law and use trends were also assessed. The decisions regarding motorized and mechanized uses will be included in the site-specific Travel Management Plan.

E155 Public Concern: The Biological Elements section of the FEIS should meet National Environmental Policy Act (NEPA) mandates.

Response: The resource protection section of the FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biological Diversity*, identifies the measures necessary to protect biological elements.

E156 Public Concern: The Forest Service should protect the biological elements of the forest ecosystem by adopting Alternative I.

Response: The National Forest Management Act states that forest plans must "provide for the diversity of plant and animal communities based on the suitability and capability of the specific land area;" the Endangered Species Act governs protection of specified species and the ecosystems upon which they depend; and national forest ecosystem management policies directly and indirectly require the Forest to maintain ecosystem function on National Forest System lands. The National Environmental Policy Act of 1970 requires that we study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was

evaluated. FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biological Diversity*, describes the process used to evaluate the alternatives and describe the impacts of the differing alternatives on the biological resources of the Forest.

E157 Public Concern: The Forest Service should adopt practices that favor the persistence of the largest variety of biota, rather than practices focused on specific species.

Response: The National Forest Management Act requires the Forest Service to maintain viable populations of all existing native and desired non-native plant and animal species on national forests. A viability assessment for species at risk is a part of the FEIS analysis (See FEIS Volume 4, Appendix B). Management direction developed, as a portion of this viability assessment, was incorporated into the 2002 Forest Plan in Chapters 1, 2, 3, and 4. The Endangered Species Act requires the Forest Service to assure that actions do not jeopardize the continued existence of any endangered or threatened species or result in the adverse modification of habitat for those species. Forest Service Sensitive Species policy (FSM 2670) provides direction for the identification and management of sensitive species on National Forest System lands. The Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N) discuss the potential impacts of implementation of the range of alternatives on threatened, endangered and sensitive species. Species-specific management prescriptions such as deer and elk winter range, bighorn sheep areas and elk management areas were applied to specific portions of the Forest when the interdisciplinary team determined that delineation to be the most appropriate use of the land.

E158 Public Concern: The Blanco District should be managed for flora and fauna.

Response: The National Forest Management Act states that forest plans must "provide for the diversity of plant and animal communities based on the suitability and capability of the specific land area;" the Endangered Species Act governs protection of specified species and the ecosystems upon which they depend; and national forest ecosystem management policies directly and indirectly require the Forest to maintain ecosystem function on National Forest System lands. The National Environmental Policy Act of 1970 requires that we study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated. FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biological Diversity*, describes the process used to evaluate the alternatives and describe the impacts of the differing alternatives on the biological resources of the Forest.

Section 1—Terrestrial Wildlife

E159 Public Concern: The Forest Service should protect forest carnivore management areas. – and –

E160 Public Concern: The Forest Service should consider that ski areas have little effect on lynx. – and –

E161 Public Concern: The Forest Service should designate areas as management area 3.55 to aid in the recovery of lynx. – and –

E162 Public Concern: The Forest Service should consider the effect of grazing on lynx habitat. – and –

E163 Public Concern: The Forest Service should retain down woody debris in lynx habitat. – and –

E164 Public Concern: The Forest Service should use prescribed fire to improve lynx habitat. – and –

E165 Public Concern: The Forest Service should consider other prescriptions besides 5.45 to manage lynx habitat. – and –

E166 Public Concern: Pre-commercial thinning should be used sparingly in lynx habitat.

Response: During development of the DEIS, the Forest used the best information available to evaluate management techniques and direction for lynx and wolverine. However, two new reports, *Ecology and Conservation of Lynx in the United States* (1999) and the *Lynx Conservation Assessment and Strategy* (2000), have been published since the release of the DEIS. The information included in these documents was incorporated, as appropriate, into the Biological Assessment and Biological Evaluation (FEIS Volume 5, Appendix N), the analysis included in the FEIS Viability assessment, and management direction articulated throughout the 2002 Forest Plan.

The Forest developed and allocated lands to a forest carnivore management area (5.45) in the DEIS. For the FEIS and 2002 Forest Plan, the Forest expanded the concept of this management area to include other species dependent upon forested landscapes. This new management area 5.5 (Forested landscape linkages) replaces MA 5.45 in the FEIS and 2002 Forest Plan. Known and suspected key landscape linkage areas for lynx were incorporated into the development and allocation of this management area.

Most natural processes are allowed to continue within Management Area 5.5 (Forested landscape linkages). However, the Forest has retained the majority of the range of vegetation treatments that may be used to provide habitat structure, composition and quantities conducive to lynx, wolverine, and other wide-ranging species reproduction and survival. Management area standards and guidelines (2002 Forest Plan) for recreation and other human uses are controlled, diurnally, seasonally or year-round to provide effective habitat security.

E167 Public Concern: The Forest Service should not control predators for economic interests.

Response: FSM 2650 provides direction concerning animal damage management on National Forest System lands. This direction outlines the cooperative approach and responsibilities between the Forest Service, APHIS, local and state agencies and other federal agencies. The Forest Service has the responsibility to cooperate with the various federal and state agencies concerning animal damage control within the direction of the 2002 Plan.

E168 Public Concern: The Forest Service should revise standards and guidelines for the FEIS.

Response: The forest-wide and management area-specific standards and guidelines were developed using the Forest Service Regional Guide, the Region 2 Desk Guide, and input from an interdisciplinary team consisting of resource specialists from a wide range of disciplines. For a description of the differences between standards and guidelines, see Chapter 2 of the 2002 Forest Plan. The direction package was reviewed and updated during intensive interdisciplinary team meetings between the draft and final 2002 Forest Plan. The direction package included in the 2002 Forest Plan is felt to best represent coordinated resource needs on the White River National Forest.

E169 Public Concern: More Money should be budgeted to protect wildlife populations.

Response: Congress provides funding to the Forest Service annually through the Interior Appropriations Bill. This process determines funds for particular programs. Therefore, increased funding for wildlife protection is outside the scope of the forest planning process.

E170 Public Concern: The Forest Service should update the Red and White Mountain and Holy Cross City areas to a G designation.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated, including impacts from motorized vehicle uses. The most recent literature concerning motorized impacts was reviewed and used to assess the impacts on biological and physical resources. Use restrictions in the 2002 Forest Plan will be based on the results of these assessments and the needs and requirements to protect physical and biological elements across the White River National Forest. Capacities, safety considerations, user conflicts, statutory requirements and use trends were also assessed. Decisions regarding motorized use will be presented through a site-specific Travel Management Plan to be conducted after completion for the 2002 Forest Plan.

E171 Public Concern: The deer and elk winter range mapped under Alternative D should be revised.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated providing varying levels of protection of ecosystem components, including deer and elk winter

range. The most recent Colorado Division of Wildlife habitat winter range information was used as the baseline inventory for this mapping layer. This information was evaluated between the DEIS and FEIS and new information was incorporated into the FEIS, where appropriate.

E172 Public Concern: The bighorn habitat prescription north of Deep Creek canyon should be extended further upstream.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated providing varying levels of protection of ecosystem components, including bighorn sheep range. The Forest used the most accurate inventory information available at the time of the land allocation mapping sessions. The information for wildlife habitats included the Colorado Division of Wildlife bighorn sheep habitat information from their Wildlife Resource Inventory System (WRIS). Based on this information, Alternative D included an area of bighorn sheep habitat (Management Area 5.42) that corresponded with WRIS mapping, immediately north of Deep Creek. There is no information to indicate that bighorn sheep would benefit from extending this designation further upstream.

E173 Public Concern: The Forest Service should reclassify the areas west and north of Adam Mountain to management areas 5.45 or 5.41.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated providing varying levels of protection of ecosystem components. Alternative D allocates the areas west and north of Adam Mountain to a combination of Management Areas 5.5 (Forested landscape linkages) and 5.41 (Deer and elk winter range).

E174 Public Concern: The final plan should include specific standards to ensure the Forest Service meets its ecosystem management and species viability obligations.

Response: The Management Indicator Species list has been reassessed, and a new list is included in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*. The Forest Service has historically cooperated with both the Colorado Division of Wildlife (CDOW) and the U.S. Fish and Wildlife Service (FWS) in carrying out its role as the primary habitat manager for NFS lands within the White River National Forest. During the development of the FEIS and 2002 Forest Plan, we relied heavily on data from the CDOW to identify wildlife habitats across the White River National Forest for management. The Forest Service also worked closely with the FWS in the development of direction to adequately manage threatened and endangered species. We will continue to work closely with both agencies during implementation of the 2002 Forest Plan.

E175 Public Concern: The Forest Service should consider that single species management may not always be appropriate.

Response: The Forest Service recognizes the importance of managing for a range of wildlife species. Species-specific management prescriptions have been applied to areas of the White River National Forest where it was determined to be the most appropriate use of the land to meet the theme of the respective alternative. For the majority of the White

River National Forest, an ecosystem approach was applied that provides for management flexibility for a wide range of wildlife species.

E176 Public Concern: The Final plan should transition to focal species management within three years.

Response: We revised the White River Forest Plan in compliance with the forest planning regulations that were applicable at the time of the analysis (36 C.F.R. 219 as codified in 1982). The 2002 Forest Plan is consistent with these regulations. New planning regulations have not been finalized. If new regulations are established, we will examine the 2002 Forest Plan for compliance with transition requirements and determine if amendments are needed.

E177 The Forest Service should strengthen Standard #4 to ensure raptor viability.

Response: The Forest Service has used the most up-to-date scientific information to revise and strengthen Standard #4 for the 2002 Forest Plan. Additional standards that protect raptors are also included in the 2002 Forest Plan (Chapter 2).

E178 Public Concern: The Forest Service should specify which species are "of concern."

Response: The entire Goal and Objective section of the 2002 Forest Plan (Chapter 1) has been rewritten. The new objective addresses the need to sustain viable populations of native and desired non-native species. It also includes Management Indicator Species identified in the wildlife section of the FEIS (Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife).*

E179 Public Concern: The Forest Service should conduct actual inventories for management indicator species.

E180 Public Concern: The Forest Service should explain why elk were chosen as a management indicator species for pinyon-juniper. – and –

E181 Public Concern: The Forest Service should include the American marten as a management indicator species. – and –

E182 Public Concern: The Forest Service should include an aquatic organism as a management indicator species.

Response: The Management Indicator Species list has been revised for the 2002 Forest Plan (Appendix EE). This new list of MIS was developed using Regional Direction for the development of MIS for Forests. The revised MIS list was developed based on species important to answering the management questions associated with the implementation of the 2002 Forest Plan. This revised list takes into account the need to be able to provide credible current and future population estimates in order to determine potential impacts from Forest management activities on both terrestrial and aquatic ecosystems. Monitoring requirements are identified in Chapter 4 of the 2002 Forest Plan.

E183 Public Concern: Extractive activities are incompatible with the protection of wildlife and should not be allowed on White River National Forest.

Response: The Forest Service manages forest resources to meet many needs and comply with legal mandates, including laws that direct the Forest Service to manage for the production of timber products (Organic Administration Act, Sustained Yield Management Act, Multiple-Use Sustained-Yield Act, and the 1872 Mining Act). These same laws also mandate the protection of resources along with the National Environmental Policy Act, Clean Water Act, Endangered Species Act, National Forest Management Act, and North American Wetlands Conservation Act. Further, the Federal Land Policy and Management Act (FLPMA) sets policy that public lands be managed "in a manner that will protect the quality of scientific, scenic, historical, ecological environment, air and atmospheric, water resource, and archeological values" (FLPMA, Sec 102, (8)). This balancing of multiple uses of forest resources has been captured in the design and evaluation of the seven management alternatives.

E184 Public Concern: White River National Forest should ban the use of ORVs during hunting seasons.

Response: The FEIS presents alternatives with a range of open and closed trails and roads. The Forest Service cooperates with the Colorado Division of Wildlife on access management. Banning the use of ORVs during hunting season has not been included as part of any alternative. Current levels of motorized use have been included in the evaluation of the alternatives in the FEIS (Volume 2, Chapter 3). A site-specific travel management plan will be completed shortly after the completion of the 2002 Forest Plan.

E185 Public Concern: The Forest Service should address the affects of off-road travel on wildlife. –and –

E186 Public Concern: The Forest Service should address the affects of recreation activities on wildlife.

Response: Current scientific literature was reviewed concerning the impacts of motorized and mechanized use impacts to wildlife. Recommendations from four major literature review efforts concerning these possible impacts (*Wildlife and Recreationists*, edited by Knight and Gutzwiller; *Effects of Recreation on Rocky Mountain Wildlife*, Edited by the Montana Wildlife Society; *The Environmental Impacts of Recreation*, edited by the Biodiversity Legal Foundation; and *Effects of Winter Recreation on Wildlife of the Greater Yellowstone Area: a Literature Review and Assessment*) were reviewed and used in the wildlife, recreation, travel management, and landscape pattern analyses of the FEIS. Additionally, information from these sources was incorporated into management direction for the 2002 Forest Plan.

The 2002 Forest Plan alternatives present a range of recreational activities. Effects of recreation activities on wildlife are presented in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*.

E187 Public Concern: The Forest Service should protect wildlife by limiting the density of motorized routes.

Response: The alternatives present a range of access management proposals, including road densities and closures (by travel method and season). Effects of road management on wildlife are presented in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*. Additionally, a site-specific travel management plan for the White River National Forest will be completed soon after the completion of the 2002 Forest Plan. This management plan will address the impacts of road and trail management on wildlife and other resources.

E188 Public Concern: The Forest Service should restrict ski area expansion in order to avoid further detrimental impacts to wildlife habitat. – and –

E189 Public Concern: In their management plan, the Forest Service should take into account the effects of ski area expansion on wildlife habitat on and near forest lands.

Response: The cumulative impacts of activities outside of National Forest System (NFS) lands is addressed in the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*. The Forest Service cannot control the activities outside of NFS lands, but standards and guidelines have been established to minimize or mitigate these activities (2002 Forest Plan, Chapters 2 and 3).

E190 Public Concern: The Forest Service should utilize the best available logging techniques to improve wildlife habitat.

Response: The 2002 Forest Plan provides general (Chapter 1 and 2) and Management Area specific (Chapter 3) standards and guidelines for how wildlife habitat will be improved, including the use of various logging (silvicultural) techniques. The proposed actions include a range of techniques for various objectives for the management areas. The impacts of the various silvicultural techniques on wildlife by alternative are addressed in the FEIS (Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation*).

E191 Public Concern: Timber harvest on the Rifle/Blanco Ranger Districts should be reduced. – and –

E192 Public Concern: The Forest Service should manage timber harvests in the Wilson Park area to benefit wildlife.

Response: Silvicultural actions, such as clearcutting or commercial harvest, are tools that may be used to accomplish a wide range of forest management goals including the management of wildlife habitat. The alternatives presented in the FEIS present a range of silvicultural techniques for management of habitat. The effects of these actions are presented in the FEIS (Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation*).

E193 Public Concern: The Forest Service should analyze the potentially detrimental effects of excessive management on species.

Response: In order to return National Forest System lands to a point in which no or very little management is necessary to maintain the desired conditions and outputs, certain management actions may be necessary. The alternatives address varying degrees of management, including no active management for some areas. Chapter 3 of the FEIS provides detailed analysis of the various management strategies, and Chapters 2 and 3 of the 2002 Forest Plan provide standards and guidelines that vary from no active management to intensive active management, depending on the area and the desired condition.

E194 Public Concern: The Forest Service should clarify wildlife habitat needs before implementation of a 2002 Forest Plan.

Response: Current information on the habitat needs of wildlife was used in the development of the alternatives and in the effects analysis of the alternatives. Information was gathered from scientific publications (FEIS Volume 4, Appendix M), discussions with scientific authorities in their respective fields, and direction from federal laws and regulations (e.g., National Forest Management Act, Endangered Species Act, Forest Service Manual). Information gathered from future research and monitoring after the 2002 Forest Plan is implemented will be considered, and adjustments may be made through a forest plan amendment (as outlined in the 2002 Forest Plan) or through project-level decisions.

E195 Public Concern: The FEIS should include citations for the sources and research used to create quantified guidelines.

Response: Strategies, standards and guidelines in the 2002 Forest Plan were developed using direction from federal laws (such as the National Forest Management Act) and regulations (such as the Forest Service Manual), and considering scientific literature (included in the 2002 Forest Plan administrative record available at the Forest Supervisor's Office). Specifically, the standards for both the bald eagle and American peregrine falcon were included in the 2002 Forest Plan as directed from the Forest Service Region 2 Desk Guide.

E196 Public Concern: The FEIS should clarify the differences between 5.41 and 5.43 management area prescriptions.

Response: The Forest Service has reworded the description under 5.43 (Elk habitat) in the 2002 Forest Plan to clarify management direction. MA 5.41 (Deer and elk winter range) includes areas that are used during winters by both elk and deer. MA 5.43 emphasizes elk habitat use throughout the year, and includes incidental winter range use by elk.

E197 Public Concern: The Forest Service should designate additional 5.43 management prescription areas.

Response: Between the DEIS and FEIS, the Forest Service conducted a thorough review of important elk habitat areas based on the best information available from Forest Service District files and the Colorado Division of Wildlife database. Alternative K was mapped using this current information to assure that critical elk habitat areas are adequately protected whenever possible while also considering other resource needs.

E198 Public Concern: The Forest Service should review the definition and use of elk security areas.

Response: The Forest Service did a thorough review of important elk habitat areas based on the best information available from Forest Service District files and the Colorado Division of Wildlife database. Alternative K was mapped using this information to assure that critical elk habitat areas are adequately protected whenever possible while also considering other resource needs.

Additionally, approximately ½ of the Forest will be managed under prescriptions that have low levels of active management or management specifically aimed at improving wildlife habitat conditions, including elk habitat (1.11, 1.12, 1.13, 1.2, 1.31, 2.1, 2.2, 5.41, 5.42, 5.43, and 5.5). These areas will provide security areas for elk and a wide variety of other wildlife species.

E199 Public Concern: The Forest Service should consider that wilderness and roadless area designations preclude the opportunity to improve wildlife habitat.

Response: Although both roadless and Wilderness designations do place restrictions on the types of activities that can occur to one degree or another, neither designation specifically prohibits the enhancement of wildlife habitat. Prescribed fire, whether natural ignition or man-created can be used under certain conditions in both designations to restore more natural ecological conditions. Other management activities to enhance wildlife habitat are also allowed to various degrees within these management areas.

E200 Public Concern: The Forest Service should prohibit oil and gas leasing and grazing in core areas and corridors that connect core areas.

Response: Although oil and gas leasing is possible under both of these management prescriptions, there are restrictions in management area 1.41 (Core areas) that state that all leases must have appropriate stipulations to protect the values for which the area was designated. In management area 3.55 (Corridors connecting core areas) the land unit is withdrawn from mineral entry when necessary to meet the objectives of the management area.

The Forest does not agree that grazing by domestic livestock should be prohibited within these areas. With proper grazing management and administration, grazing is an appropriate use within these two management prescriptions.

E201 Public Concern: The Forest Service should designate core habitat areas for raptors.

Response: The Forest understands the valuable contributions of raptors to a wide range of ecosystem values, and has forest-wide standards specific to the protection of their reproductive areas (see Wildlife Standard # 4 of the 2002 Forest Plan). Additionally, many management areas directly or indirectly protect important habitats for raptors on the Forest. The Forest has not identified any raptor concentration areas and does not believe that it is necessary to designate specific habitat areas for raptors.

E202 Public Concern: The Forest Service should close roads to the extent necessary to improve habitat effectiveness ratings.

Response: Travel management is recognized as an important aspect of wildlife habitat protection. The site-specific travel management plan for the Forest will be developed soon after the completion of the FEIS and 2002 Forest Plan. Several of the management areas in the 2002 Forest Plan have road density standards (3.21, 5.4, 5.43) or restrictions on the construction of new roads (5.5) that will result in benefits to wildlife sensitive to roads and vehicle traffic.

E203 Public Concern: The Forest Service should clarify elk habitat standards.

Response: Elk management standards and guidelines were developed for the 2002 Forest Plan using the most current, accepted models for analysis of elk habitat effectiveness (Habitat Effectiveness Index). Working in coordination with the Colorado Division of Wildlife and the Forest Service Region 2 Office, we determined the minimum index level to be applied in each DAU (2002 Forest Plan, Chapter 2 – *Wildlife*). A summary explanation of the analysis procedure is presented in FEIS Volume 4, Appendix B – *Description of the Analysis Process*. Impacts to elk and HEI from future actions will be determined through site-specific analysis within each individual DAU.

E204 Public Concern: The Forest Service should explain why habitat connectivity and effectiveness studies appear to have been conducted primarily for lynx and elk habitat management.

Response: Elk and lynx have had recent studies or reports that relate to habitat effectiveness and methods of maintaining habitat security for the species. Both species have been shown to be influenced by travel management and have requirements that relate to connectivity of habitats, security cover, and road densities. Most species on the White River National Forest do not have the same level of scientific documentation concerning potential impacts of forest management activities. The Forest has used the information concerning habitat effectiveness and the needs for connectivity from elk and lynx to infer potential impacts to a wider range of wildlife species for which specific studies are not available. The assumption is that if habitat requirements are met for elk and lynx that they will also be met for the majority of these other species.

E205 Public Concern: The Forest Service should conduct a landscape level core habitat analysis.

Response: There are several different options for the maintenance of biological diversity on landscapes. The commenter stresses the need for maintaining core reserves, while the Forest is focusing mainly on the maintenance of the necessary landscape pattern elements within the overall habitat matrix to maintain movement capabilities across the Forest. The 5.5 management prescription (Forested landscape linkages) is an adaptation of the core reserve philosophy that provides landscape scale linkages for wide ranging wildlife species. This management area was designed largely to benefit forest carnivores such as lynx, wolverine, and marten, but many other species of wildlife will benefit from these forested connections. These areas have been designed and mapped to provide for landscape scale movements around identified natural or man-created constrictions in forested ecosystems across the White River National Forest.

E206 Public Concern: The Forest Service should designate the Vail category III corridor as a "concern area."

Response: Although the Forest did not designate the Vail Category III area as a "concern area", the area south of the Vail Ski Area permit boundary was mapped as an area for the management of lynx in all alternatives. The area was recognized as an important area for the continued movement of forest carnivores across the landscape and is mapped as 5.5 (Forested landscape linkages) in all alternatives.

E207 Public Concern: The Forest Service should extend concern area 'A' to the continental divide.

Response: Identified Concern Areas are only used as an analysis tool. There is no specific management direction for these areas except as they occur in Management Areas or that Forest-wide direction may apply within these areas for specific wildlife species. Extending the delineation of a Concern Area will not provide any additional connectivity beyond what is already directed in the 2002 Forest Plan. Concern Area 'A' was delineated for analysis purposes specifically to analyze the impacts of activities and developments in the Snowmass-Buttermilk area. There are many areas of possible corridor movement on the Forest, including the Ten Mile Range area. Other areas of known or possible corridor movement are included in discussions of lynx in FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation.*

E208 Public Concern: Concern area 'C' should stress the importance of Georgia Pass.

Response: Concern Area 'C' was delineated for analysis purposes specifically to analyze the impacts of activities and developments in the Keystone-Arapahoe area. There are many areas of possible corridor movement, including the Georgia Pass area. Other areas of known or possible corridor movement are included in discussions of lynx in FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation.*

E209 Public Concern: The Forest Service should designate the area south of Redcliff as management area 5.41.

Response: The Forest analyzed a wide range of alternatives that contained a diversity of management area prescriptions for portions of the Forest, based on the theme of the respective alternative being considered. A large area south of Redcliff was mapped and analyzed as deer and elk winter range in Alternatives I and K.

E210 Public Concern: The Forest Service should change the management area prescription for the Tiger-Swan Mountain area.

Response: The Forest analyzed a wide range of alternatives that contained a diversity of management area prescriptions for portions of the Forest, based on the theme of the respective alternative being considered. The Tiger-Swan area of the Forest was mapped as 1.31 and 5.41 in Alternatives B and I and 5.43 in Alternatives C, D, E, F, and K.

E211 Public Concern: The Forest Service should list additional bighorn sheep herds as priority.

Response: The Forest worked closely with representatives of the Colorado Division of Wildlife in documenting the most important bighorn sheep herds on the White River National Forest. The four endemic bighorn sheep herds were given top priority due to their status as native, endemic herds. A wide variety of social and ecological considerations were taken into account when mapping the Forest, including the requirements of bighorn sheep as well as existing, historic uses of the Forest. Other management prescriptions also provide for the health and maintenance of wildlife including bighorn sheep.

E212 Public Concern: The FEIS should correct some of the maps that show bighorn sheep range.

Response: The Forest has worked with the Colorado Division of Wildlife to make corrections to the bighorn sheep range maps. These corrected maps were used in the analysis of the FEIS and are included in the 2002 Forest Plan.

E213 Public Concern: The Forest Service should verify sapsucker occupancy across the forest.

Response: This analysis in the DEIS was not meant to imply that all potential territories for a species are currently occupied. Rather, it was meant to indicate the amount of habitat possibly available on the Forest for various species, such as sapsuckers. An analysis of territories was not included in the FEIS, rather, possible acres of habitat for a species was analyzed, when appropriate, to present differences between alternatives and possible impacts on habitat and population trends (FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation*).

E214 Public Concern: The Forest Service should not use wildlife habitat as a means to exclude other uses.

Response: The Forest Service is required by the National Forest Management Act to manage National Forest System (NFS) lands for a variety of uses. Wildlife habitat management provides certain uses of NFS lands such as hunting and viewing (along with many other uses). These uses were analyzed to determine issues, concerns and opportunities as well as develop appropriate alternatives. When uses are in conflict with each other, changes (and possibly exclusion of some uses) are necessary in order to comply with federal regulations and direction.

E215 Public Concern: The Forest Service should clarify the necessity of bat protection.

Response: Many bat species, including Townsend's big-eared bat (a sensitive species), require specific microclimate and disturbance conditions. Use of mines and caves that provide, or could provide, these conditions may be altered by human activities within and outside the caves or mines. Bat populations, in general, have been decreasing in North America. One of the causes of these decreases is the elimination of nursery and winter roosts through human visits or destruction. Protection of caves and mines is necessary to maintain habitat for the survival for those bat species using caves or mines. Specific

direction is included in the 2002 Forest Plan in Chapters 1, 2, 3, and 4 to protect cave resources and bats in particular.

E216 Public Concern: White River National Forest should consider that declining deer populations might be due to increasing predator populations.

Response: The Forest has acknowledged in the FEIS (Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*, Mule Deer) that population levels of mule deer are impacted not only by habitat quantity and quality on the Forest, but also by hunting, predation, and habitat off the Forest.

E217 Public Concern: The Forest Service should implement habitat conservation plans.

Response: The Forest has revised it viability assessment and its Management Indicator Species listing. These revised processes resulted in new management direction which has been incorporated into the 2002 Forest Plan as new direction to assure that viability of all native and desired non-native species are maintained. This direction is not specifically habitat conservation plans, but it accomplishes many of the same goals.

E218 Public Concern: The Forest Service should delete the second sentence of the Management Area 5.41 Desired Condition discussion.

Response: The Forest has clarified this portion of the Management Area Description by editing "Activities may…" to "Activities that may be managed or restricted…."

E219 Public Concern: Big game winter range should be management priority.

Response: The Forest agrees with the comment that big game winter range is a critical issue. The Forest has provided protection to big game winter range through all of the alternatives, including Alternative K, by mapping of the majority of the deer and elk winter range as 5.41 (Deer and elk winter range) with the associated protections of the standards and guidelines. Additional important habitats are included in the 5.43 management area (Elk habitat).

E220 Public Concern: White River National Forest should selectively, rather than aggressively, manipulate habitat.

Response: The Forest does site-specific NEPA and analysis for all management activities that have a potential for impacting environmental conditions. Our habitat enhancement programs and projects are designed and evaluated to be selective to result in specific, identified habitat goals. A Biological Assessment (addressing federally-listed threatened, endangered, or proposed species) and a Biological Evaluation (addressing Region 2 sensitive species) was prepared for all activities with the potential to impact those species or their habitats. Both documents can be found in FEIS Volume 5, Appendix N.

E221 Public Concern: The Forest Service should only use critical habitat management where critical habitat has been designated.

Response: The Forest understands that the term "Critical Habitat" has specific legal meaning under the Endangered Species Act and does not use that term in regards to lynx in the FEIS or the 2002 Forest Plan. The 5.5 management prescription (Forested landscape linkages) is applied largely to implement the LCAS and Regional Lynx Forest Plan Amendment Project.

E222 Public Concern: The Forest Service should monitor for rare and declining non-game species.

Response: See responses E77 and E78. Additionally, The Forest has revised the Management Indicator Species list (2002 Forest Plan, Appendix EE) and the monitoring plan. The 2002 Forest Plan includes new requirements to inventory and monitor the status of identified species throughout the Forest (Chapter 4).

E223 Public Concern: The Forest Service should identify which species currently have unsuitable habitat with special attention given to sensitive, threatened, and endangered species.

Response: The Forest conducted a viability analysis process to identify those species that are, or maybe, of viability concern, including considering the availability of past, current and future habitat. Direction for threatened, endangered and sensitive species as well as species of concern are included in the 2002 Forest Plan (Chapters 1, 2 and 3). Analysis of what impacts the 2002 Forest Plan may have on these species are included in the FEIS (Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation*), including impacts to habitat. Monitoring appropriate species and their habitats is included in the 2002 Forest Plan (Chapter 4).

E224 Public Concern: The Forest Service should address the effects of trail development on wildlife habitat.

Response: The effects of trail development and recreational use is addressed in the FEIS (Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*, Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5 Appendix N – *Biological Evaluation*) and through standards and guidelines in the 2002 Forest Plan (Chapters 1, 2 and 3 for general and specific wildlife species). A travel management plan will be completed soon after completion of the 2002 Plan, which will include disclosure of the effects of specific road and trail management decisions on wildlife.

E225 Public Concern: The Forest Service should survey for critical habitat and safeguard these habitats from damaging activities.

Response: FSM 2620 and 2670 require that necessary habitat surveys, monitoring and management for management indicator, threatened, endangered, proposed and sensitive species be included in a forest plan. The 2002 Forest Plan, Chapters 1 and 2 include goals, objectives, strategies, standards and guidelines for the management of these species and their habitats. FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*, describes the effects that the alternatives would have on these species and their habitats.

The Forest completed an updated viability assessment between the DEIS an FEIS. Information from this assessment was used to develop direction to assure that the Forest meets its responsibilities concerning the maintenance of species viability across the Forest. This direction is included in the 2002 Forest Plan in Chapters, 1,2,3, and 4.

E226 Public Concern: White River National Forest should protect wildlife habitat.

Response: FSM 2620 and 2670 require that habitat management for management indicator, threatened, endangered, proposed and sensitive species be included in a forest plan, including protection of habitat for certain species in certain areas if necessary. The 2002 Forest Plan includes goals, objectives, strategies, standards and guidelines for the management of these species and their habitats, and the FEIS describes the effects that the Alternatives would have on these species and their habitats (Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*; Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5, Appendix N – *Biological Evaluation*).

E227 Public Concern: Standards should be developed to protect critical deer and elk winter range.

Response: The standards and guidelines for Management Area 5.41 (Deer and elk winter range) are presented in the 2002 Forest Plan (Chapter 3). These standards and guidelines were reviewed between the DEIS and FEIS, and changes to the 2002 Forest Plan were made, including specific restriction dates, when deemed necessary. The use of guidelines rather than the use of standards is desired for certain activities depending on the goals, site conditions and expertise necessary.

E228 Public Concern: White River National Forest should protect the wildlife habitat by adopting Alternative I.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated providing varying levels of protection of ecosystem components. The protection of wildlife habitat is a component of each alternative. The relative contributions of each alternative with regard to protection of wildlife habitat are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*.

E229 Public Concern: The Forest Service should preserve vulnerable mid-elevation lands important to wildlife.

Response: Management area prescriptions specific to wildlife were applied in each alternative based on the theme and desired conditions for that alternative – including, in some cases, protection of mid-elevation lands important to wildlife. Management areas with emphasis on wildlife values were allocated based on inventory data, including Colorado Division of Wildlife habitat maps (in administrative record), and the knowledge of local resource specialists.

E230 Public Concern: The FEIS should include specific designation for winter, summer and transitional habitat within management area 5.43. – and –

E231 Public Concern: The FEIS should specify the acceptable level of human activity in elk habitat.

Response: Elk calving, summer and winter habitat, and migration areas have been delineated for Management Area 5.43 (Elk habitat) in the FEIS and 2002 Forest Plan. Appropriate management for these areas is included as a part of the 2002 Forest Plan (see MA 5.43). Seasonal restriction periods are delineated and are tied to specific polygons of habitat associated with MA 5.43.

E232 Public Concern: The White River National Forest should amend standards and guidelines for Management Area 5.43 to allow aerial trams.

Response: Areas for aerial transportation corridors are addressed in Management Area 8.31 (Aerial transportation corridors) in Chapter 3 of the 2002 Forest Plan. The FEIS presents various corridors as part of the alternatives and addresses the impacts of these corridors on elk and on general wildlife (Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*). Aerial transportation corridors are not precluded in Management Area 5.43 (Elk habitat) if such activity meets the theme and management direction of the management area. Proposals for corridors within this management area would be analyzed as a project-level decision.

E233 Public Concern: The Forest Service should maintain Lost Park elk habitat and coordinated resource management.

Response: The range of alternatives addresses elk management in the Lost Park area. All or part of this area is included in Management Area 5.43 (Elk habitat) in Alternatives D, C and K. The Forest has cooperated, and will continue to cooperate, with the Colorado Division of Wildlife concerning elk management in this area and throughout the Forest.

E234 Public Concern: The 5.4 management area west of Green Mountain Reservoir should be extended.

Response: The range of alternatives presented in the FEIS identifies various management areas for the Green Mountain Reservoir area, as well as the impacts to wildlife. This area is identified as Management Area 5.4 (Forested flora and fauna habitats) in Alternative E.

E235 Public Concern: The Williams Peak management area prescription should be revised.

Response: The Williams Peak area is identified as Management Area 5.41 (Deer and elk winter range) in Alternative I and Management Area 5.43 (Elk habitat) in Alternatives C and F of the FEIS.

E236 Public Concern: The area between Boulder Creek and Cataract Creek should be designated as Management Area 5.41.

Response: The range of alternatives presented in the FEIS identifies various management area prescriptions for this area. Impacts to wildlife from the alternatives are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*. The area between Boulder Creek and Cataract Creek has been identified as Management Area 5.43 (Elk habitat) in alternative K based on its value as elk seasonal range including winter range.

E237 Public Concern: The Georgia Pass area should be designated Management Area 5.45.

Response: The Georgia Pass area has not been identified as Management Area 5.45 (Forest carnivores) in any alternative. During development of the Proposed 2002 Forest Plan and DEIS, the Forest used the best information available to develop and evaluate management techniques and direction for lynx and wolverine. However, new reports, *Ecology and Conservation of Lynx in the United States* (1999) and the *Lynx Conservation Assessment and Strategy* (2000) have been published since the release of the draft planning documents. The information included in these reports has been incorporated, as

appropriate, into the 2002 Forest Plan and FEIS. Incorporation of this information has led the Forest to develop a new Management Area to replace 5.45. This new management area, 5.5 (Forested landscape linkages), incorporates many of the features of 5.45 but was developed to meet the landscape level movements of species requiring forested landscapes including lynx and wolverine. Georgia Pass has not been identified as a significant forested landscape linkage area in any study done to date for lynx, wolverine or other species.

E238 Public Concern: The area between Ophir Mountain and the Whatley Ranch should be designated Management Area 5.41.

Response: The range of alternatives presented in the FEIS identifies various management areas for this area. Impacts to wildlife from the alternatives are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*. Ophir Mountain and the Whatley Ranch areas have been identified as Management Area 5.43 (Elk habitat) in Alternatives C, D and K. Standards and guidelines for Management Area 5.43 (Elk habitat) also include management for elk winter range. This area was identified as important to elk for more reasons than just winter range.

E239 Public Concern: The Forest Service should manage the corridor area east of Keystone for wildlife conservation.

Response: The range of alternatives presented in the FEIS identifies various management areas for this location. Impacts to wildlife from the alternatives are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*. The corridor area east of Keystone is identified as Management Area 5.5 (Forested landscape linkages) in Alternative D and K, with other management areas identified in other alternatives.

E240 Public Concern: The area south of Keystone should be Management Area 5.45.

Response: The majority of the area south and east of Keystone is identified in Alternative K as 5.5 (Forested landscape linkages). The Forest developed this new Management Area to replace 5.45. It incorporates many of the features of 5.45, but was developed to meet the landscape level movements of wide-ranging species requiring forested landscapes including lynx and wolverine.

E241 Public Concern: The Forest Service should redesignate 5.45 Management Areas.

Response: The ESA directs the Forest to assure that we are managing the Forest to conserve threatened or endangered species such as the lynx. During development of the Proposed 2002 Forest Plan and DEIS, the Forest used the best information available to develop and evaluate management techniques and direction for lynx and wolverine. However, two new reports, Ecology and Conservation of Lynx in the United States (1999) and the Lynx Conservation Assessment and Strategy (2000) have been published since the release of the draft planning documents. The information included in the reports has been incorporated, as appropriate, into the 2002 Forest Plan and FEIS. The allocation of lands to Management Prescription 5.5 (see response number E 97, above) in Alternative K, is considered necessary for the Forest to meet its responsibilities under the Endangered Species Act for the conservation and recovery of the Canada lynx.

E242 Public Concern: The Forest Service should re-designate management area prescriptions in the Tenderfoot Mountain area.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated providing varying levels of protection of ecosystem components, including impacts from motorized vehicle uses. The most recent literature concerning motorized impacts was reviewed and used to assess the impacts of motorized vehicle use on a wide range of biological and physical resources. Restrictions on use in the 2002 Forest Plan were based on the results of these assessments and the needs and requirements to protect physical and biological elements across the Forest. Capacities, safety considerations, user conflicts, law and use trends were also assessed. The decisions regarding motorized use will be included in the site-specific Travel Management Plan that will be completed shortly after the completion of the FEIS and 2002 Forest Plan.

E243 Public Concern: The management area prescriptions between Climax and Copper Mountain should be revised. –and-

E244 Public Concern: The 5.45 management area on Hardscrabble Mountain should be changed to 5.43.

Response: The range of alternatives presented in the FEIS identifies various management areas for this area. Impacts to wildlife from the alternatives are addressed in the FEIS (Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*). During development of the Proposed 2002 Forest Plan and DEIS, the Forest used the best information available to develop and evaluate management techniques and direction for lynx and wolverine. However, two new reports, *Ecology and Conservation of Lynx in the United States* (1999) and the *Lynx Conservation Assessment and Strategy* (2000) have been published since the release of the draft planning documents. The information included in these documents was incorporated, as appropriate, into the 2002 Forest Plan and FEIS.

E245 Public Concern: The season of restriction dates for elk calving areas should be revised.

Response: Seasonal restriction dates used in the DEIS were developed using the best information available at the time, including recommended dates from the Colorado Division of Wildlife (CDOW). Some of CDOW's recommendations have been modified based on new information. These dates have been reviewed and incorporated into the FEIS and 2002 Forest Plan (MA 5.43) as appropriate.

E246 Public Concern: The FEIS should review if management area prescriptions other than wilderness protect wildlife habitat.

Response: See response E111. Also, all species of wildlife react in different manners to development or management activities. Many species are tolerant of development to one extent or another and no species on the White River National Forest have been documented to be dependent upon Congressionally-designated Wilderness for their survival. The Forest-wide standards and guidelines provide protection for various species (Plants, bats, raptors, TES species, species of viability concern, riparian species, elk and others). Management area direction includes various levels of protection for wildlife.

Some of this direction is general in nature such as road management, while others are specific to individual species (5.41, 5.42, 5.43, and 5.5). Some management areas are even more restrictive than Wilderness (i.e. Research Natural Areas do not allow new roads or trails; restrict recreation use to low levels; and also restrict domestic livestock grazing). Many management areas do not allow oil and gas leasing or have restrictions on leasing to protect the values for which the area was designated (1.2, 1.41, 1.5, 2.1, 2.2, 3.1,3.4, and 4.4). Forested areas within several most management areas do not contribute to the suitable timber base and are not included within the ASQ, and many management areas have travel management restrictions specifically designed to enhance wildlife values.

E247 Public Concern: The Forest Service should address the effects of human intrusion on the habitat of forest dependent birds.

The effects of 'human intrusion' are addressed in the FEIS (Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species-level assessment*; Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*; and Volume 5, Appendix N – *Biological Evaluation*), including specific discussions on wildlife associated with forested areas. These sections include discussions of the impacts on forested and non-forested habitats from travel management, recreation management, vegetation management, and other management actions.

E248 Public Concern: The North-South wildlife corridor east of Keystone and others should be preserved.

Response: The Forest understands the value of maintaining landscape scale movement areas for widely dispersing species, such as forest carnivores. A range of options for management of the Forest based on the Alternatives was considered in development of the FEIS and the 2002 Forest Plan. The area immediately east of Keystone Ski Area is designated as 4.3 (Dispersed recreation) in Alternative B, C, E, F, and I, while it is identified as 5.5 (Forested landscape linkages) in Alternatives D and K.

E249 Public Concern: The Forest Service should revise invalid acreage statistics in Table 3-53.

Response: The theme and desired condition of Management Area 5.4 (forested flora and fauna habitats) reflect the focus of this prescription on maintaining ecological values including wildlife habitat. Active management and natural disturbances dominate these landscapes. Replication of historic range of variability conditions for landscape pattern will result in a range of structural stages that will benefit elk and other wildlife habitat conditions. In Management Area 5.4, timber harvest rotation ages will pattern historic ranges, and rotation periods may be longer and entry periods may be less frequent than traditional approaches. These restrictions help the Forest to meet elk habitat needs.

E250 Public Concern: Standards for snag and downed woody debris retention should be revised.

Response: Snags and downed woody debris are important elements for supplying a range of habitat and ecological values. The recommended standard for retention of snags and downed woody material in the Region 2 Desk Guide was used as the template for Biological Standard 2 (2002 Forest Plan). Additionally, the Forest increased the minimum values recommended in the Desk Guide to assure these values are maintained

on National Forest System lands. Recent scientific information concerning snag and downed woody debris was reviewed and incorporated into the 2002 Plan (Chapter 2 – *Biodiversity*) as appropriate to protect these habitat values.

E251 Public Concern: The Habitat Effectiveness Evaluation Index should not be the sole means of assessing elk habitat.

Response: The habitat effectiveness index (HEI) (2002 Plan, Chapter 2 – *Wildlife*; and FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial Wildlife*) provides a measurable index method of comparing the impact of the different alternatives on elk. Management and scientific professionals accept the HEI as a tool for these comparisons. Until other tools are developed and scientifically shown to provide better analysis information, the Forest, in cooperation with the Colorado Division of Wildlife and the Bureau of Land Management, will continue to use the HEI as one of the tools in the management of wildlife.

E252 Public Concern: Standards should be developed that give priority to species with limited habitat requirements.

Response: Management for sensitive, threatened, endangered and proposed species is required by FSM 2670, and is included in the 2002 Forest Plan standards and guidelines. Most of these species have limited habitat requirements. The identification and management of management indicator habitat and species is required by FSM 2620. Goals, objectives, standards and guidelines for these habitats and species are provided in the 2002 Forest Plan. The selection of management indicator species was reanalyzed for the FEIS. The need for standards and guidelines for specific wildlife was reviewed, and changes were made, when deemed necessary.

The Forest completed an updated viability assessment between the DEIS an FEIS. Information from this assessment was used to develop direction to assure that the Forest meets its responsibilities concerning the maintenance of species viability across the Forest. This direction is included in the 2002 Forest Plan in Chapters, 1,2,3, and 4.

Section 2—Aquatic Resources

E253 Public Concern: The Forest Service should improve Colorado River cutthroat trout habitat.

Response: The Forest recognizes the importance of Colorado River cutthroat trout and aquatic habitat in general. Between the draft and final Forest Plan, specific standards and guidelines were added to address Colorado River cutthroat trout habitat needs and threats (2002 Forest Plan Chapter 2, Section 2 – *Biological*, Species of Viability Concern – *Aquatic*). Water and aquatic resource standards, in conjunction with Watershed Conservation Practices Handbook protocols (FSH 2509.25) (incorporated as standards into the 2002 Forest Plan), are the primary means to protect aquatic systems, including cutthroat habitat. The 2002 Forest Plan standards and guidelines and handbook protocols address water-quality and fish-habitat aspects, such as minimizing sediment entering streams, keeping woody debris in stream channels, protecting riparian areas, preventing erosion and minimizing the risk of contaminants entering streams.

The Forest is a partner in the Conservation Plan for Colorado River Cutthroat Trout in northwest Colorado. The cutthroat conservation plan emphasizes locating and evaluating

the condition and risks to cutthroat trout subpopulations, taking steps to secure the populations (such as creating barriers to prevent invasion by non-native trout), improving habitat and removing non-native trout. As directed by the cutthroat conservation plan, the Forest Service has inventoried all of its known cutthroat trout streams and identified natural barriers as well as potential sites for creating barriers. In addition, a habitat survey was completed and the presence and abundance of non-native trout determined. Some barriers have already been constructed and the Forest Service is working with the Colorado Division of Wildlife on removal of non-native trout (specifically Eastern brook trout). The Forest Service is continuing to survey streams of unknown status to determine the presence of cutthroat trout and identify future projects for cutthroat trout population enhancement.

E254 Public Concern: The Forest Service should reevaluate the number of amphibian species known to exist on the Forest.

Response: According to the 1986 Colorado Division of Wildlife publication *Amphibians and Reptiles in Colorado*, the four species of amphibians listed in the FEIS are the only species known to exist on the Forest. The Forest Service is unaware of any other amphibian species occurring on the Forest. However, other species are known to occur in the area at lower elevations, off National Forest System lands.

E255 Public Concern: An undisturbed streamside buffer zone standard should be adopted on a case-by-case basis.

Response: The Forest Service protects streamside areas by applying Water Conservation Practices, which are incorporated as standards in the 2002 Forest Plan. The standard in the Watershed Conservation Practices Handbook (FSH 2509.25) that addresses streamside buffers is #12.1 – "In the water influence zone next to perennial and intermittent streams, lakes, and wetlands, allow only those actions that maintain or improve long-term stream health and riparian ecosystem condition." The description goes on to explain that the minimum width of the water influence zone is 100 feet or the mean height of mature dominant late-seral vegetation. Effects of all projects on streams and riparian areas are addressed on a case-by-case basis in a project-specific biological evaluation. Streamside activity is routinely avoided to minimize effects to aquatic systems.

E256 Public Concern: The Forest Service should revise the discussion of the four endangered fish species of the Upper Colorado River within the Aquatic Resources section of the DEIS including the role of Ruedi Reservoir.

Response: The Aquatic Resources Section of the FEIS (Volume 2, Chapter 3, Topic 1, Part 3, Section 2) has been changed to read: "Reasons for the decline of the Endangered fish species in the Colorado River downstream of the White River National Forest include habitat loss due to dam construction and subsequent loss or alteration of natural flows and physio-chemical regimes, channelization, water quality degradation, introduction of non-native species, and other human caused disturbances (*Final Programmatic Biological Opinion for Bureau of Reclamation's Operations and Depletions, Other Depletions, and Funding and Implementation of Recovery Program Actions in the Upper Colorado River Above the Confluence with the Gunnison River*, US Fish and Wildlife Service, December 1999).

Ruedi Reservoir on the Fryingpan River is one of several western slope reservoirs that provide water to the Colorado River. As a participant in the Upper Colorado River Endangered Fish Recovery Program, the Bureau of Reclamation releases water from Ruedi in the summer and fall to augment flows in the "15 mile reach" (the stretch of the Colorado River starting at the confluence with the Gunnison River and extending 15 miles upstream). The flow augmentation, as discussed in the 1999 Programmatic Biological Opinion, is part of a program to ensure that endangered fish receive adequate flows while also allowing development of water resources.

E257 Public Concern: The Forest Service should address the effects of timber harvest on fish habitat.

In FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 2 – *Aquatic Resources*, effects of timber harvest on aquatic resources is discussed. In addition, timber harvest was one of the risk factors included in the analysis of alternatives to cutthroat trout and aquatic management indicator species.

E258 Public Concern: The Forest Service should limit the number of anglers on the Fryingpan River to enhance the recreational experience and protect the river.

Response: The State of Colorado sets fishing rules and restrictions. Water flow in the lower Fryingpan affects fishing quality and access, therefore affecting the number of anglers on the river. Flow levels in the lower Fryingpan River are controlled by water released from Ruedi Reservoir by the Bureau of Reclamation (BOR). The BOR works to minimize impacts to fishing while meeting the needs of downstream water users.

The Forest Service controls the number of outfitter/guides and amount of commercial use permitted on the Fryingpan River. Outfitter/guide use is determined by a capacity analysis and the amount of use is capped. This capacity analysis is a site-specific analysis outside the scope of the forest planning process. In addition, many private landowners on the lower Fryingpan River allow outfitter/guides river access on their property, over which the Forest Service has no control.

E259 Public Concern: The Forest Service should recognize that recreational fishing opportunities may not be improved by adding amenities.

Response: The Forest Service agrees that fishing opportunities are governed more by size and availability of fish as well as access to fishing sites. However, we feel providing amenities, such as toilets and picnic areas, creates more opportunities for family-type outings that may include fishing.

E260 Public Concern: The Forest Service should include an aquatic organism as a management indicator species. (295.1 Cutthroat Trout, 295.2 Brook and Rainbow trout, 295.3 Boreal Toad)

Response: The main issues with regard to management of aquatic resources are maintenance of water quality and quantity and physical habitat characteristics for aquatic species. Between the draft and final Forest Plan, the Forest Service identified three aquatic management indicator species (or communities) to address questions associated with these issues including: macro-invertebrate communities, all trout species, and brook and brown trout. A description of the questions to which each of these species (or communities) respond and the aspect of these species (or communities) that will be used

and an indicator can be found in the FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species Level Assessments*, Individual Species Reports for MIS.

E261 Public Concern: The Forest Service should more adequately address the viability of sensitive amphibians.

Response: The Rocky Mountain Region of the Forest Service is currently developing a scientifically reviewed framework from which to assess species viability. The Regional process is expected to take five years to complete, at which time the White River National Forest, as well as other Forests in the Region, will use the Regional viability assessment to reassess viability of sensitive amphibians and other species of concern. As an interim measure, a preliminary viability analysis based on a process used on the Chugach National Forest was conducted for all amphibians, as well as other vertebrate species, known to inhabit the White River National Forest. This analysis is included in FEIS Volume 2, Chapter 3, Topic 1, Part 2 – *Biodiversity*.

E262 Public Concern: The Forest Service should identify and protect actual and potential Boreal toad habitat.

Response: The Southern Rocky Mountain population of the boreal toad extends from northern New Mexico into southern Wyoming at elevations greater than 7,500 feet. Of the 11 geographic areas (mountain ranges) inhabited by the boreal toad, four are within or partially within the White River National Forest. There are twelve known breeding populations of boreal toads within or adjacent to the White River National Forest. Before any new projects are undertaken, the potentially affected area must be evaluated and surveyed for boreal toads to ensure potential effects to toads are minimized. Because the boreal toad is a species of viability concern on the White River National Forest, specific standards and guidelines were developed to ensure protection of boreal toads and boreal toad habitat (2002 Forest Plan Chapter 2, Section 2 – *Biological*, Species of Viability Concern – *Aquatic*).

The Forest Service is signatory to the Conservation Plan and Agreement for the Management and Recovery of the Southern Rocky Mountain Population of the Boreal Toad (October 1998). The conservation plan includes recommended strategies for habitat management that have been incorporated into the 2002 Forest Plan. These management standards and guidelines include protection of occupied and potential boreal toad habitat. Additional standards that protect known and potential toad habitat are included in the Watershed Conservation Practices Handbook (FSH 2509.25). Watershed Conservation Practices Handbook protocols are incorporated as standards into the 2002 Forest Plan.

E263 Public Concern: The Forest Service should address the effects of water diversions on fish habitat.

Response: The White River National Forest has updated the aquatic species analysis to strengthen the discussion of water depletions on aquatic species. The revised analysis can be found in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 2 – *Aquatic Resources*.

E264 Public Concern: The Forest Service should ensure protection for watershed level refugia.

Response: The Forest Service agrees that a watershed approach is critical to protect the physical and biotic components of riparian and aquatic systems. Forest-wide standards and guidelines are included in the 2002 Forest Plan with the intention to provide such protection. These applicable range of standards and guidelines include: all Soils standards, all Water and Aquatic Resources standards, Range management guidelines, and Wildlife standards.

E265 Public Concern: Integrated soil-water-fish improvement schedules for watersheds should be included in the 2002 Forest Plan. – and –

E266 The Forest Service should develop and implement integrated watershed restoration plans.

Response: Appendix B of the 2002 Forest Plan includes mention of key Forest Service policies that form the basis of land management. The policy discussion includes Forest Service Manual 2520, which directs National Forests to "develop integrated soil-water-fishery improvement schedules for watersheds, coordinated with other resources." This directive, as with all Forest Service directives, applies to every National Forest management activity and, thus, is a part of the White River National Forest's 2002 Forest Plan.

E267 Public Concern: The 2002 Forest Plan should ensure consistency with Colorado fish and wildlife population objectives.

Response: The Forest Service strives to protect and enhance fish and wildlife habitat across the White River National Forest. Common goals the Forest Service shares with the Colorado Division of Wildlife (CDOW) are: Protect wildlife species that may be at risk of becoming threatened or endangered (CDOW Long Range Plan Goal 5), protect and improve high priority aquatic habitats (CDOW Long Range Plan Goal 12.1), and implement recovery plans for high priority species (CDOW Long Range Plan Goal 7). Both the CDOW and the Forest Service are active participants in the Colorado River Cutthroat Trout Joint Conservation Strategy for Colorado, Wyoming and Utah, and the Boreal Toad Conservation Strategy/Recovery Plan for Colorado.

E268 Public Concern: The Forest Service should clarify which activities that potentially affect fisheries are within the scope of the 2002 Forest Plan.

Response: In general, a forest plan makes land allocation decisions and does not authorize actual ground-disturbing activities or other actions. However, some land allocation decisions establish the potential for future activities that could affect fish and fish habitat. Land allocations that present the greatest potential to degrade fish habitat include: lands suitable for timber harvest, lands suitable for livestock grazing, and enlarging or creating new ski area boundaries. Areas recommended for wilderness designation and native fauna management have the greatest potential to positively affect fisheries (FEIS Volume 5, Appendix N – *Biological Evaluation/ Biological Assessment for Aquatic Species*).

For native fish species, specifically Colorado River cutthroat trout, the factors most impacting the viability are biological. Whirling disease, competition with brook trout, and hybridization with rainbow trout and other subspecies of cutthroat trout appear to be the

driving factors in the subspecies decline. Another factor strongly impacting fisheries on the White River National Forest is water depletion, including large trans-basin diversions sending Westslope water to the Front Range.

E269 Public Concern: The Forest Service should adopt an aquatic conservation strategy.

Response: The Rocky Mountain Region of the Forest Service has initiated a process to address species viability. One of the intended products of this process is a regionally based aquatic conservation strategy. In the interim, the White River National Forest is using Watershed Conservation Practices Handbook (FSH 2509.25) protocols (incorporated as standards into the 2002 Forest Plan), to guide protection and improvement of aquatic systems. In addition, standards and guidelines developed to protect aquatic species for which there is a viability concern (e.g., Colorado River cutthroat trout and western boreal toad), provide additional protection in areas including habitat for those species.

E270 Public Concern: The Forest Service should revise water and aquatic resources standards for the final plan.

270.1 Standard #5

Response: Standard #5 (2002 Forest Plan Chapter 2 – *Water and Riparian Resources*) is part the Watershed Conservation Practices (WCPs) Handbook (standard 12.1), which is found in the Forest Service Directive System as FSH 2509.25. To understand the standard more fully, we direct readers to the WCP Handbook, page 4, Chapter 10, a copy of which can be found in the administrative record at the Forest Supervisor's Office. Moreover, a definition of "watershed influence zone" has been added to the glossary for the 2002 Forest Plan.

While the Forest Service recognizes the authority of agencies such as EPA, the Army Corps of Engineers, and the Colorado Department of Public Health and Environment; we must also comply with our own policies. For example, the Forest Service Manual (FSM), at 2520, outlines the objectives and policies that apply to watershed protection and management. FSM 2520 specifically addresses riparian area and floodplain management as well as wetlands protection. Accordingly, the Forest Service does not believe that Standard #5 is redundant to other agency's direction.

270.2 Standard #6

Response: Standard #6 is part the Watershed Conservation Practices (WCPs) Handbook (Standard 12.2), which is found in the Forest Service Directive System's Forest Service Handbook (FSH 2509.25). A copy of the full WCPs, with design criteria, is available at the White River National Forest Supervisor's Office in Glenwood Springs, CO.

The Forest Service has determined that the standard is adequate as written. We interpret the phrase "free movement" (as it is worded in the standard) to mean movement both up and down the stream. There may be cases, in fact, where a stream barrier is desirable to prevent exotic fish from invading upstream native fisheries. These conditions will be analyzed before constructing specific stream crossings and other instream structures.

The design criteria (guidelines) associated with Standard #6 provide direction to protect aquatic life and channel stability without constructing unnecessarily large structures. In

fact, the design criteria state, "…ensure that all facilities remain stable, not necessarily pass the entire flood flow."

270.3 Standard #9

Response: The Water and Aquatic Standard #9 is part of the Watershed Conservation Practices (WCPs) Handbook (FSH 2509.25, Standard 12.5). Wording for this Standard has been revised by the Regional Office since publication of the DEIS and is now included in the FEIS. The amended language is included in the 2002 Forest Plan, Chapter 2 – *Water and Riparian Resources*.

Standard #9 provides direct guidance for protecting streamflows on the White River National Forest—particularly when considered in conjunction with Forest Service authority to protect stream processes, riparian and aquatic habitats, and recreational and aesthetic values. Additionally, the standard and its design criteria provide guidance for protecting stream flow dependent resources, while being sensitive to historic uses. The Forest Service, under federal law, is required to protect and maintain National Forest resources for multiple uses. We recognize the Colorado Water Conservation Board's ("CWCB") authority to hold instream flow water rights. In addition, the Forest Service will address stream flow needs in separate site-specific analyses (if, where, and when necessary) in order to fulfill its responsibilities under federal law.

Section 3—Forested Vegetation

E71 Public Concern: The Forest Service should adopt an aggressive approach to forested vegetation management.

Response: See response number E147. Additionally, the Forest is required by various laws, including the National Environmental Protection Act, the National Forest Management Act and the Endangered Species Act, to maintain biological values across the Forest. The range of alternatives in the FEIS evaluated differing levels and areas appropriate for logging actions and restrictions across the Forest. Activities are addressed as impacts to biodiversity, including using logging as a tool to enhance biodiversity values. Beginning in FEIS, Chapter 3, Topic 1, Part 2, the impacts from logging and other management activities to landscape pattern, composition and function are discussed. The other physical and biological sections of the FEIS also discuss impacts of logging within the various alternatives on their respective resource areas.

E72 Public Concern: The Forest Service should address the effects of snowmobile activity on forested vegetation.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives providing varying levels of protection for ecosystem components was evaluated, including impacts from motorized vehicle uses. The most recent literature concerning motorized impacts was reviewed and used to assess the impacts of motorized vehicle use on biological and physical resources. Use restrictions in the 2002 Forest Plan will be based on the results of these assessments and the needs and requirements to protect physical and biological elements across the Forest. Capacities, safety considerations, user conflicts, law and use trends were also assessed. The decisions regarding motorized use will be included in the site-specific Travel Management Plan.

E73 Public Concern: The Forest Service should protect Aspen forests.

Response: Aspen is recognized as an important ecological consideration on the Forest. Forest-wide Biological Guidelines in the 2002 Forest Plan provide direction for protection and management of aspen stands on the Forest.

E74 Public Concern: The FEIS should include a detailed discussion of the effects of Alternative D on forested vegetation.

Response: The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated that provide varying levels of protection for ecosystem components. The effects of implementing the alternatives on landscape pattern characteristics and forested vegetation is discussed beginning in Chapter 3, Topic 1, Part 2 of the FEIS.

E75 Public Concern: Biological Guideline #3 should be clarified in the Final Plan.

Response: Forest-wide Biological Guideline 3 of the 2002 Forest Plan was developed as a modification of the direction included in the Region 2 Desk Guide. This guideline was developed to ensure maintenance of aspen due to its recognized ecological value, and the recent scientific information indicating that aspen may be declining across the West. The regeneration of aspen clones will have high priority in stands where conifer invasion has reduced aspen basal area below 10 feet per acre.

E260 Public Concern: The statement, "more uniformed age class.... than.... desired" for aspen and lodgepole pine should be clarified.

Response: This statement has been reworded to better reflect the ecological situation

E261 Public Concern: Fire, and not logging, should be used to establish young stands of aspen and lodgepole pine.

Response: Approximately 1/3 of the WRNF is managed as Congressionally designated wilderness. Another 1/3 is managed under prescriptions that do not provide for high levels of active management. On the remaining 1/3, prescriptions provide for various levels of active management, including timber sale activity. Approximately 1000 acres of annual timber sale activity is expected to occur on the WR under the Revised Forest Plan. The majority of these sales are expected to be the initial harvest cuts of a shelterwood silvicultural system, which would not initiate stands of aspen or lodgepole pine. Only limited harvest of aspen and lodgepole pine is anticipated under the Revised Plan. Natural processes such as fire, insects and disease and wind are expected to the major disturbance factors affecting aspen and lodgepole pine throughout the life of the plan. For further discussion, see Topic 1, Part 3, Section 3.

E262 Public Concern: The effects from skiing development above tree line should be measured in terms of biodiversity and changes of drainage patterns and not by lack of changes in forest vegetation.

Response: This discussion is included in the section of the FEIS specifically addressing impacts to late-successional forestlands beginning Chapter 3, Topic 1, Part 3, Section 3 of the FEIS. The intent of the statement addressed by the commenter was to indicate the potential impacts of ski area development on late-successional forests, not on other aspects of biodiversity.

E267 Public Concern: The Forest Service should revise maximum patch size determinations.

Response: The fragmentation analysis completed as a portion of the FEIS (Topic 1, Part 3, Section 3) documents the wide variability in patch sizes for all of the major cover types on the Forest. This analysis was not able to detect management-related changes in the average patch size for late successional stands of lodgepole pine or aspen, the two age classes and cover types where changes were expected to be the most evident due to past silvicultural management activities. In fact, for these two cover types, the average patch size was larger in managed areas than in reference areas, contrary to what was expected.

The maximum size of cutting units is set by FS policy at 40 acres for Forests in the Rocky Mountain Region. Exceptions for this are provided under Regional Forester exception and after a 60-day public review period. (Chapter 2, Section 2, Silviculture, Standard 5).

E268 Public Concern: The Forest Service should address the lack of age class diversity in forested vegetation.

Response: The current structural stages by tree species for the White River National Forest are displayed in Table 3-17 of the FEIS, Topic 1, Part 3, Section 3, Forested Vegetation. The table does show a lack of structural/age diversity in forested vegetation with approximately 50% of the forested land on the Forest in a mature and old growth structural stages.

The 2002 Forest Plans provides for management of structural/age class diversity through the use of active vegetation management (timber harvest and prescribed fire) and the reliance of natural vegetation disturbance processes. Natural vegetation disturbance processes is considered passive management and changes to structural/age class diversity will on balance take place over a longer time period compared to active vegetation management.

Approximately 1,300,000 acres on the White River National Forest are forested, of that 845,000 acres are “tentatively suitable” for timber management. Under the preferred Management Alternative K, approximately half of the “tentatively suitable” acres for timber management (425,000 acres) are designated in Management Areas “suitable” for timber management. Within the 425,000 acres of “suitable” timberlands, active vegetation management maybe used as a tool to manage structural/age class diversity in forested vegetation. Structural/age class diversity on the remaining 875,000 acres outside of “suitable” timberlands will be predominately management under natural vegetation disturbance processes.

Under all Management Alternatives, structural/age class diversity on the majority of forested lands will be managed under natural vegetation disturbance processes (refer to FEIS, Chapter 3, Topic 6, Table 138 – Acres of Suitable Timber Lands). Given the reliance on natural vegetation disturbance processes, the overall structural/age class diversity is not expected to significantly change over the next 10-15 years under the 2002 Forest Plan.

Old Growth and Late Successional Forests

E76 Public Concern: The Forest Service should protect old growth forests in White River National Forest.

Response: Old growth and late successional forests are important ecosystem components. An old growth inventory was completed as part the inventory for the forest plan revision process. Stands identified as meeting the Region 2 description of old growth during the inventory were removed from the suitable timber base; therefore, they will be managed long term primarily through natural processes. Management direction for old growth and late successional forests is addressed in Forest-wide Biological Standard 4 (2002 Forest Plan) and Appendix F of the 2002 Forest Plan. Approximately 1/2 of the Forest will continue to be managed largely by natural processes due to the allocation of management area prescriptions such as wilderness, recommended wilderness, research natural areas, non-motorized, and wild and scenic rivers. Additionally, much of the rest of the Forest will have limited active management associated with the 2002 Forest Plan and will be managed largely through natural disturbances. Due to the limited extent of active timber and associated management activities proposed under all alternatives in the FEIS and 2002 Forest Plan, the majority of the forested stands on the WRNF will continue to age naturally, with continued increases in the amount and extent of late successional and old growth forests.

E269 Public Concern: The management direction for old growth with respect to wildlife should be justified and explained on a scientific basis.

Response: Local variations in topography, soils, climate, elevation, and natural disturbance regimes prevent scientifically-based minimum or maximum standards for old growth that can be applied across large areas. No information is available to dictate the absolute minimums of old growth that must be maintained on the Forest to meet ecological needs. The WRNF has recently completed an old growth inventory as a portion of the Forest Plan Revision effort. All identified old growth stands have been withdrawn from the suitable timber base and will be managed to maintain old growth values. The Forest reviewed the Historical Range of Variability information developed as a portion of the Revision effort (Topic 1, Part 2, Section 1) to determine historic disturbance regimes and resultant age class distributions. A standard was established to maintain at least a minimum amount of old growth in the major cover types generally considered on the Forest to proceed through succession to obtain old growth characteristics. These minimums are exceeded for most cover types across most of the Forest. With the minimal amount of active silvicultural management planned to occur under the Revised Forest Plan, the overall age of forested stands will continue to increase. More forest stands will develop into old growth than will be managed throughout the life of the plan.

Additionally, the WR has taken the step of assuring that late successional forests above and beyond old growth will be maintained by setting standards for minimums thresholds to be retained across the Forest. This standard has not been established on any other forest to our knowledge.

E270 Public Concern: Edge density should be included in the late successional spruce-fir assessment.

Response: Edge densities were calculated for all structural classes of spruce fir, including late-successional, in the three assessments beginning in Chapter 3, Topic 1, Part 2 of the FEIS.

Section 4—Non-forested Vegetation

E78 Public Concern: The Forest Service should address the effects of Alternative E on high-altitude vegetation. – and –

E79 Public Concern: The Forest Service should address the effects of recreation on high-altitude vegetation.

Response: The effects of Alternative E on high-altitude vegetation are disclosed in the FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 4 – *Non-forested Vegetation*.

E80 Public Concern: The FEIS should address the effects of snowmobiles on high-altitude vegetation.

Response: A travel management plan will be prepared following a decision on the 2002 Forest Plan. The effects of travel management on alpine vegetation will be analyzed and displayed within the environmental consequences section of the analysis for the travel management plan decision.

E263 Public Concern: The expected five percent decline in rangeland plant communities should be explained in the FEIS.

Response: For the most part, the percentage of "Rangelands with plant communities and soil characteristics typical of the ecological type where they occur" will continue to increase as improved management systems are implemented, with the exception of those plant communities where the introduction of noxious weeds is significantly changing species composition. These numbers will be recalculated in the FEIS to reflect current information on noxious weeds infestations and desired plant community definitions. It is expected that the decline will be considerably higher than five percent in the first decade and significantly higher in the fifth decade as it is estimated that noxious weeds spread at a rate of 15 percent every year.

E266 Public Concern: Rangeland vegetation should be managed for desired conditions, not existing conditions.

Response: Goal 1.6 and Objective 1.6 in the 2002 Forest Plan have been revised accordingly in the final planning documents (See 2002 Forest Plan Chapter 1).

E271 Public Concern: The Forest Service should restrict activities to protect uncommon flowers.

Response: Protection of sensitive plants is addressed by standards and guidelines in Chapter 2, Section 2 of the 2002 Forest Plan. An analysis of effects of activities on sensitive plants is provided in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 4 – *Non-forested Vegetation*.

Section 5—Domestic Livestock Grazing

G1 Public Concern: The FEIS should not limit cattle grazing.

Response: The authority to protect, manage and administer the National Forest System for range management purposes comes from the Acts identified in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 5 – *Domestic Livestock Grazing*. The Forest does not propose to eliminate or reduce current livestock grazing levels in any of the alternatives described in the FEIS. The analysis for determining the future status of vacant allotments is described in FEIS Volume 4, Appendix B – *Description of Analysis Process*. Vacant allotments having value for domestic livestock grazing or providing management flexibility are recommended for retention, while vacant allotments having little value in these respects are being closed. Adjustments in livestock numbers are made at the individual allotment management planning level, not at the forest planning level.

G2 Public Concern: Grazing should be allowed in order to preserve small business.

Response: None of the alternatives identified in the FEIS eliminate or reduce current livestock grazing levels on the Forest. Forest Service policy states that, where consistent with forest land and resource management plans, forage is to be made available to qualified livestock operators from lands that are suitable for livestock grazing (FSM 2203.1-6). One of the objectives of the Forest Service's range management program (FSM 2202.1-4) is "to contribute to the economic and social well being of people by providing opportunities for economic diversity and by promoting stability for communities that depend on range resources for their livelihood."

G3 Public Concern: Grazing permittees whose contingent private base operation lands are permanently dedicated to agricultural use should be given as much priority as is consistent with bio-management integrity.

Response: Forest Service policy states that, where consistent with forest land and resource management plans, forage is to be made available to qualified livestock operators from lands that are suitable for livestock grazing (FSM 2203.1-6). The process of allocating available forage is identified in (FSM2209.13, Chapter 10).

G4 Public Concern: Sheep grazing should take precedence over cattle grazing.

Response: The determination as to whether sheep or cattle will graze a particular area is made at the site-specific allotment management planning level and is based on an evaluation of numerous factors including terrain, type of feed, elevation, current permittee's operation and demand.

G5 Public Concern: The Forest Service should assess conflicts with livestock grazing in the Main Elk Creek area and wild and scenic river designation.

Response: Main Elk Creek was not proposed for wild and scenic river designation in any alternative in the FEIS. The Wild and Scenic Rivers Act does not preclude grazing; however grazing is not permitted in research natural areas (RNAs). If an area is allocated as an RNA, the boundary of that RNA will be adjusted to exclude areas within active allotments, thereby eliminating any effect on existing grazing.

G6 Public Concern: Ungulate livestock and wildlife forage goals should be determined by winter habitat carrying capacity.

Response: The range standard in Management Area 5.41 (Deer and elk winter range) in the 2002 Forest Plan (Chapter 2) provides for livestock stocking rates that ensure adequate forage is available for deer and elk**.** Livestock and wildlife forage volume goals are not determined at the forest planning level. An estimate of the Forest-wide forage production and amounts consumed by both domestic livestock and deer and elk can be found in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 5 – *Domestic Livestock Grazing*.

Carrying capacities for specific areas are determined at the allotment management planning level, not at the forest planning level. The Colorado Division of Wildlife sets desired deer and elk herd goals. While the carrying capacity of deer and elk winter range is a critical factor, only a small percentage of deer and elk winter range is on National Forest System lands. The majority of winter range is on lands administered by the Bureau of Land Management and on private land (mainly ranches).

G7 Public Concern: The term "overgrazing" should be redefined in proposed amendments.

Response: The definition of overgrazing as identified in FEIS Volume 4, Appendix L – *Glossary*, was taken from the Society for Range Management's *A Glossary of Terms Used in Range Management*. Overgrazing includes reducing historical variety and diversity of vegetation, as well as soil erosion, siltation and loss of riparian cover.

G8 Public Concern: The Forest Service should not remove land from active grazing.

Response: The authority to protect, manage and administer the National Forest System lands for range management purposes comes from the Acts identified in the Domestic Livestock Grazing section of the FEIS. The Forest does not propose to eliminate or reduce current livestock grazing levels in any of the alternatives described in the FEIS. The analysis for determining the future status of vacant allotments is described in FEIS Volume 4, Appendix B – *Description of Analysis Process*. Adjustments in livestock numbers are made at the individual allotment management planning level.

The Forest recognizes the value of properly managed domestic livestock grazing and the value of maintaining open space and wildlife winter range. As stated in the FEIS the Forest will continue to support many viable livestock operations. Livestock numbers/operations are not expected to decline in the rural areas surrounding the Forest. In more urbanized areas, increasing land values and the complexities of managing livestock in areas of high recreation have and will continue to result in a decline in the desirability and feasibility of grazing.

The analysis of vacant allotments (FEIS, Appendix B) determined which allotments have value for domestic livestock grazing and should be retained as vacant until further analysis can be completed and which ones have little value and could be closed to future livestock use. The value of the allotments to aid in management flexibility (e.g., to be used during drought) was part of that analysis. All grazing allotments, whether active or vacant, are available for dispersed recreation opportunities.

G9 Public Concern: The FEIS should address the cumulative impacts of grazing and other activities on the environment and recreation.

Response: The effects of closing or retaining vacant allotment on other resources is discussed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 5 – *Domestic Livestock Grazing* and FEIS Volume 5, Appendix N – *Biological Assessment and Biological Evaluation*. The vacant allotment analysis in FEIS Volume 4, Appendix B – *Description of Analysis Process*, recommends allotments that should be closed to grazing, retained for further study, or partially retained. The analysis does not recommend stocking. Site-specific analysis of those allotments recommended for retention or partial retention will occur at the allotment management planning level.

G10 Public Concern: The White River National Forest should provide future grazing allotments by adopting Modified Alternative C.

Response: "Modified Alternative C" was a comment provided by US Congressman Scott McInnis and was not part of the DEIS. Land allocations and direction provided in Modified Alternative C (referred to as the "Blended Alternative" in the FEIS) were considered during the development of Alternative K.

G11 Public Concern: The Forest Service should balance wildlife protection and cattle grazing.

Response: As identified in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 4 – *Non-forested Vegetation*, Forest-wide forage production is more than sufficient to support existing livestock and wildlife needs. No reductions are proposed. Any site-specific adjustments in management are made at the allotment planning level.

G12 Public Concern: The Forest Service should close the grazing allotment in the Marvine Creek area.

Response: Marvine Allotment is an active allotment. Concerns such as these are addressed at the site-specific allotment management planning level—this allotment is scheduled for analysis during the 2002-2004 period.

G13 Public Concern: The Forest Service should use the draft document "Clean Water Act Requirements for Grazing Permit Renewals" in the grazing allotment reanalysis process.

Response: Individual allotment management compliance with the Clean Water Act will be completed as part of the site-specific allotment management planning process.

Effects of Livestock Grazing on the Environment

G14 Public Concern: The Forest Service should assess the effects of livestock grazing on ecosystems.

Response: Forest-wide standards and guidelines have been developed to minimize the risk of soil and vegetation damage from livestock grazing and to ensure long-term productivity of the land. The effects of domestic livestock grazing, as proposed under these standards and guidelines on soils and vegetation, are displayed in Volume 2, Chapter 3 of the FEIS. If additional protection is needed at the individual allotment planning level, range guidelines in Chapter 2 of the 2002 Forest Plan provide for that flexibility.

G15 Public Concern: The Forest Service should allow grazing in order to reduce fuel loads.

Response: Text has been added to FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 5 – *Domestic Livestock Grazing* that identifies the beneficial and adverse effects of livestock grazing on fuels management**.**

G16 Public Concern: The Forest Service should continue to allow grazing permits in order to protect wildlife habitat.

Response: None of the alternatives identified in the FEIS eliminate or reduce current livestock grazing levels on the Forest. One of the objectives of the Forest Service's range management program (FSM 2202.1-4) is "to contribute to the economic and social well being of people by providing opportunities for economic diversity and by promoting stability for communities that depend on range resources for their livelihood." Forest Service policy states that, where consistent with forest land and resource management plans, forage is to be made available to qualified livestock operators from lands that are suitable for livestock grazing (FSM 2203.1-6). Text has been added to FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 5 – *Domestic Livestock Grazing* that identifies the indirect effect of livestock grazing on the maintenance of winter range.

G17 Public Concern: The Forest Service should consider that domestic grazing does more damage to forests and animal habitat than motorized vehicles.

Response: Uncontrolled use of the forest, whether it be cattle grazing or recreational use can cause damage to forest soils, vegetation and wildlife habitats. Standards and guidelines have been developed for the protection or management of forest resources. Livestock will be managed under the standards and guidelines identified in the 2002 Forest Plan, Chapter 2, to minimize risk of damage to these resources.

G18 Public Concern: The FEIS should explain how the effects of domestic livestock grazing compare to those of native ungulate grazing.

Response: Historic and current forage consumption by livestock and wildlife is addressed in the FEIS.

G19 Public Concern: The Forest Service should manage grazing allotments to avoid conflicts with wolves.

Response: The White River National Forest is not identified as part of the US Fish and Wildlife Service's Wolf Reintroduction Plan nor is there any known wolf populations on the Forest. Wolf reintroduction is outside the scope of the 2002 Forest Plan.

G20 Public Concern: Cattle grazing should be reduced in riparian areas.

Response: Riparian vegetation residual guidelines in the 2002 Forest Plan (Chapter 2) are designed to protect riparian areas from overuse by domestic livestock. These guidelines are considered adequate in the FEIS Volume 5, Appendix N – *Biological Evaluation/Biological Assessment* and the Watershed Conservation Practices handbook (FSH 2509.25) to protect the riparian and aquatic resources. Specific grazing practices and livestock numbers found to be degrading or jeopardizing riparian habitat condition are addressed at the allotment management planning level. Site-specific analysis and mitigation is developed at that level.

G21 Public Concern: Sheep grazing should not be allowed in municipal watersheds.

Response: Site-specific adjustments in livestock numbers and management practices are made at the allotment management planning level, not at the forest planning level.

G22 Public Concern: Sheep grazing should be limited in order to reduce the risk of disease transmission to bighorn sheep.

Response: Bighorn sheep habitat areas are identified in Management Area 5.42 (Bighorn sheep habitat), which includes the endemic Avalanche, Snowmass/Maroon Creek, Battlement and Gore Range herds considered by the Colorado Division of Wildlife (CDOW) to be high priority. The standards for grazing within bighorn sheep habitat in Chapter of the 2002 Forest Plan prohibit sheep grazing unless adequate temporal or spatial separation can be demonstrated. Transplanted bighorn sheep herds were not identified as being within Management Area 5.42 because of their more nomadic nature. These herds will be addressed at the site-specific allotment management planning level.

The CDOW and Colorado Woolgrowers Association (CWA) met to develop a joint recommendation concerning the management of domestic and bighorn sheep. After much negotiation, the CDOW wrote up a draft agreement. However, the final agreement was never signed, as CWA did not feel it was appropriate to sign an agreement dictating what should occur locally. Local agreements were signed and presented to the Forest Service as recommendations to the forest planning process.

These agreements are examples of how agencies and permittees can work together to resolve site-specific concerns. One of these agreements, the Gore Range bighorn sheep habitat area, has been designated as Management Area 5.42 in the 2002 Forest Plan. This agreement provides for adequate special and temporal separation. It will be implemented through the annual operating instructions for the Red and White Allotment until such time it can be incorporated into the allotment management plan.

G23 Public Concern: The Forest Service should consider that isolation from domestic sheep alone will not solve all the problems of bighorn sheep.

Response. The Forest Service recognizes the environmental and human-caused factors that limit bighorn sheep production as stated in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 1 – *Terrestrial wildlife*.

Infrastructure and Improvements

G24 Public Concern: The Forest Service should evaluate the costs and benefits of reservoirs, ponds and water tanks against the cost and impact of the roads needed to install and maintain them.

Response: The need and cost of range improvements are evaluated at the allotment management planning level, not at the forest planning level.

G25 Public Concern: The Forest Service should post signs identifying grazing areas.

Response: The need to post signs notifying the public of grazing can occur at the individual allotment planning level, if needed, and is not a requirement of forest planning.

Standards and Guidelines

G26 Public Concern: Grazing standards and guidelines should be developed locally.

Response: Where supported by research or experience, site-specific herbaceous vegetation utilization, vegetation residue, stream bank disturbance and woody species utilization guidelines will be developed during rangeland planning. In the absence of updated planning and approved decision documents, the allowable use and riparian residual guidelines and mitigation measures identified in Chapter 2 of the 2002 Forest Plan will apply.

G27 Public Concern: Rangeland standards in Tables 2.2 and 2.3 should be clarified.

Response: In the absence of updated planning and approved decision documents, the allowable use and riparian residual guidelines and mitigation measures identified in Chapter 2 of the 2002 Forest Plan will apply. Where supported by research or experience, site-specific herbaceous vegetation utilization, vegetation residue, stream bank disturbance and woody species utilization guidelines will be developed during rangeland planning. At the site-specific allotment management planning more specific allowable-use guidelines can be developed as needed.

Riparian vegetation residue guidelines in the 2002 Forest Plan Chapter 2 display plant heights needed for the maintenance or improvement of riparian area condition. In other words, for summer/fall use on a riparian area in satisfactory condition removing livestock once the average herbaceous vegetation height reaches an average of 4 inches is sufficient to maintain that area in satisfactory condition, whereas a riparian area in unsatisfactory condition needs an average height of 6 inches left after grazing to provide for the recovery or improvement in riparian area condition. Riparian areas grazed earlier in the year can withstand slightly heavier use because there is greater opportunity for regrowth throughout the summer.

G28 Public Concern: The Forest Service should provide stronger standards and guidelines for rangeland improvements.

Response: In the absence of updated planning and approved decision documents, the allowable use and riparian residual guidelines and mitigation measures identified in Chapter 2 of the 2002 Forest Plan will apply. Where supported by research or experience, site-specific herbaceous vegetation utilization, vegetation residue, stream bank disturbance and woody species utilization guidelines will be developed during rangeland planning. At the site-specific allotment management planning level, more specific allowable-use guidelines will be developed as needed. The key to the standard allowing 45 percent use of forage species on unsatisfactory range, as displayed in the 2002 Forest Plan, is the length of time that grazing is allowed on each unit. The shorter the period of time allowed, the more opportunity for regrowth and recovery.

G29 Public Concern: Site-specific conditions concerning the trailing of livestock should address in grazing guidelines for sheep.

Response: The guidelines identified in Chapter 2, Section 2 of the 2002 Forest Plan address keeping livestock driveways out of riparian areas except to cross and rehabilitation or relocation of stock driveways that are causing damage. Other site-

specific conditions concerning the trailing of livestock will be addressed at the allotment planning level.

G30 Public Concern: The Forest Service should not make proposed changes to the grazing standards and guidelines.

Response: Considerable research has been conducted on livestock forage utilization in relation to range condition and trend and riparian area management. The 35 percent maximum allowable-use figure in the 2002 Forest Plan Chapter 2 is recommended to improve rangeland that is in unsatisfactory condition. A summary of some of this research can be found in the Society for Range Management Rangelands "Grazing Studies: What We've Learned" by Jerry Holechek, Hilton Gomez, Francico Molinar and Dee Galt. In that evaluation of grazing studies, light stocking (averaging 32 percent utilization) resulted in an upward trend in ecological condition and only a slight improvement occurred under moderate stocking (averaging 43 percent utilization).

The 20 to 25 percent streambank disturbance factor is from the Watershed Conservation Practices Handbook (FSH 2509.25). The research conducted by Clary and Webster (1993), "Livestock Use in Riparian Areas" was used to provide direction for management of riparian areas. In the absence of updated planning and approved decision documents, the allowable use and riparian residual guidelines and mitigation measures identified in the 2002 Forest Plan Chapter 2 will apply. Where supported by research or experience, site-specific herbaceous vegetation utilization, vegetation residue, stream bank disturbance and woody species utilization guidelines will be developed during rangeland planning.

The rangeland standards and guidelines incorporate many of the principles of intensive and holistic management, including grazing intensity, duration, timing and need for time for vegetative regrowth.

G31 Public Concern: The Forest Service should set a deadline to phase- season-long grazing.

Response: Review of the present grazing systems on active allotments revealed that there are currently no allotments being managed under continuous, season-long grazing systems. The standard in the 2002 Forest Plan Chapter 2 has been modified to reflect this.

G32 Public Concern: The FEIS should address the impacts of implementing Range Standards #2 as presented in the DEIS.

Response: Fencing, which is allowed in wilderness, is not the only means of managing livestock. Livestock management systems, range improvement and acceptable activities in wilderness are dealt with at the site-specific allotment management level.

G33 Public Concern: The Forest Service should change the 5.12 management prescription for the area near Irish Springs.

Response: There has been no change in how the area near Irish Springs is managed—this area was identified as Management Area 6B in the 1984 Forest Plan, which is equivalent to Management Area 5.12 (General forest and rangeland) in the 2002 Forest Plan. While it is true that harvest can result in dense aspen regeneration and reduce livestock use in some areas, it is not expected to have a significant impact on the forage available in this area. More than adequate forage exists in this area to support livestock as well as wildlife.

G34 Public Concern: The Forest Service should revise the language in the description of Management Area 3.1.

Response: Special interest areas are managed to protect or enhance the unusual characteristics of the area. The livestock grazing guideline in the 2002 Forest Plan Chapter 2 allows for grazing and livestock improvements in special interest areas, if they do not conflict with the values for which the area was proposed or designated.

G35 Public Concern: The Forest Service should add a range-related guideline to Management Area 1.2.

Response: Grazing is allowed in all Category 1 management prescriptions, which includes Management Area 1.2 (Recommended for wilderness). Forest-wide goals for rangeland ecosystems and ecological integrity provide for the maintenance or enhancement of rangeland potential and desired biological and physical ecosystem components. These goals apply within and outside wilderness.

G36 Public Concern: The Forest Service should retain the livestock grazing prescription on the grazing allotment along the South Fork of Middle Thompson Creek.

Response: The grazing allotment along the South Fork of Middle Thompson Creek was mapped and evaluated in Alternative D as Management Area 5.43 (Elk habitat) in response to the overall theme of that alternative. The lower elevations of this area serve as winter and transition range; the upper elevations serve as calf production areas and summer solitude for elk. The elk habitat prescription allows grazing by domestic livestock to continue. This area was mapped and evaluated as Management Area 5.12 (General forest and rangelands) in Alternative B.

G37 Public Concern: The Forest Service should redraw the line of Management Area 2.1 near the Quaker Mesa ~~grazing~~ Allotment.

Response: This area was incorrectly mapped in the draft planning documents. If this area is identified as Management Area 2.1 (Special interest areas) in the final alternative, map lines will be corrected to follow the allotment boundary between North Thompson/Fourmile and West Divide Allotments.

G38 Public Concern: The Forest Service should change the Sunlight South parcel from Management Area 8.25 to 5.12.

Response: This area was incorrectly mapped in the draft planning documents. From your description, the area in question is in. This area (the north ½ of section 3, Township 8 south, Range 89 west) should have been mapped the same as lands adjacent to it—Management Area 5.43 (Elk habitat) in Alternative D. This same area is designated as Management Area 5.12 (General forest and rangelands) Alternative B.

Monitoring and Enforcement

G39 Public Concern: The Forest Service should enforce grazing regulations.

Response: Enforcement of existing regulations is outside the scope of the forest plan. While present laws and regulations provide for protection of resources, forest plan standards and guidelines as described in the 2002 Forest Plan Chapter 2 identify levels of grazing that will be allowed to maintain or improve resource conditions.

G40 Public Concern: The FEIS should include monitoring requirements for rangelands and grazing.

Response: Rangeland monitoring is addressed in Chapter 4 of the 2002 Forest Plan. In addition to these monitoring items, each allotment management plan has a monitoring section that identifies the items to be monitored and when they will be monitored.

G41 Public Concern: The Monitoring and Evaluation Plan should require an adequate amount of annual field verification of range conditions.

Response: Rangeland monitoring and evaluation is conducted at the site-specific allotment management planning level. There are three types of monitoring: implementation, effectiveness and validation. Implementation monitoring determines whether standards and management practices identified in the allotment management plan (AMP) and the forest plan are being implemented. This is accomplished through permit compliance reviews and utilization inspections that are completed on an annual basis.

Effectiveness monitoring determines whether management practices are effective at moving the allotment toward desired condition as described in the forest plan and AMP objectives. An example of effectiveness monitoring is condition and trend studies that determine whether vegetation is moving towards the desired plant community. This long-term monitoring is useful, as significant changes in vegetative composition cannot always be detected on an annual basis.

The amount and frequency of monitoring is based on desired condition, level of grazing and complexity of the overall allotment situation. To explain the difference between the 67 percent of the Forest that is estimated to be satisfactory condition and the fact that only 18 percent was monitored in 1997, the key area concept was used. This concept is based on the premise that evaluations of correctly identified small areas are reliable indicators of grazing impacts on the entire unit or allotment. Key areas are those areas where use is most likely to occur first and be the heaviest. They are relatively small areas from which information gathered can then be extrapolated to larger areas.

Effects of Other Management Activities on Grazing

G42 Public Concern: The Forest Service should assess the impacts of road closures on grazing. – and –

G43 Public Concern: The Forest Service should assess the impacts of banning ATVs on grazing. – and –

G44 Public Concern: The Forest Service should disqualify areas with active grazing allotments from wilderness eligibility. – and –

G45 Public Concern: The Forest Service should assess the effects of wilderness designation on grazing allotments.

Response: The effects of management activities and wilderness designation on grazing are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 5 – *Domestic Livestock Grazing*.

G46 Public Concern: The Colorado Division of Wildlife should decrease elk herd numbers to protect grazing allotments.

Response: The Colorado Division of Wildlife sets desired elk and deer population goals and objectives. Allotment-specific resource concerns are addressed at the individual allotment management planning level, not at the forest planning level.

G47 Public Concern: The Forest Service should reconsider lynx management guidelines due to impacts on livestock grazing.

Response: Lynx direction is the result of the recent listing of lynx as a threatened species. Considerable change has occurred in lynx direction since the draft. Cooperation between Federal and state agencies has occurred to develop the Lynx Conservation Assessment and Strategy. Current direction is located Chapter 1, Goal 1 – *Ecosystem health* and Chapter 2 – *Forestwide Standards and Guidelines* of the 2002 Forest Plan

G48 Public Concern: The Forest Service should address the effect Management Areas 1.2 and 3.32 have on grazing allotments in the North Thompson and Coal Basin areas.

Response: Grazing and the maintenance of range improvements are allowed in Management Areas 1.2 (Recommended wilderness) and 3.32 (Backcountry recreation, non-motorized with winter motorized). Congressional guidelines further explain that "the maintenance of support facilities existing in the area prior to its classification as wilderness (including fences, line cabins, water wells and lines, stock tanks etc.) is permissible in wilderness." Where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment. This may include, for example, the use of backhoes to maintain stock ponds, pickup trucks for stock-water facilities. Such occasional use of motorized equipment should be expressly authorized in the grazing permit for the area involved.

G49 Public Concern: The White River National Forest should protect public safety by prohibiting Akbash dogs.

Response: The use of guardian dogs to protect sheep from predation is outside the scope of the forest plan. Site-specific conflicts should be addressed at the individual allotment management planning level.

G50 Public Concern: The Forest Service should keep trails open to horses if they are open to cattle.

Response: If trails are open to domestic livestock they should be open to rancher's horses and the general recreating public. If resource damage is occurring as a result of trail use, it should be redesigned or closed.

Vacant Allotment Management

G51 Public Concern: The White River National Forest should address vacant allotment management separately from the forest plan process.

Response: The retention or closure of individual allotments was influenced by the theme of the alternatives. The criteria used for evaluating the allotments remain consistent between alternatives; however, the emphasis on individual criteria varies between alternatives. The decision to close or retain individual vacant allotments will be based on

the selected alternative. Even if the vacant allotment analysis were conducted separately from the forest planning process, the 2002 Forest Plan would still guide the analysis of vacant allotments.

G52 Public Concern: The Forest Service should close more vacant allotments.

Response: Forest Service policy provides where consistent with Forest Land and Resource Management Plans, for forage to be made available to qualified livestock operators from lands that are suitable for livestock grazing (FSM 2203.1-6). The use of an area by domestic livestock does not preclude the use of that area for other uses. The analysis used to determine the future status of vacant allotments included a variety of factors and other possible uses (FEIS Volume 4, Appendix B – *Description of Analysis Process*). Vacant allotments were analyzed to determine which allotments have value for domestic livestock grazing and should be retained as vacant until further site-specific analysis could be completed and which ones have little-to-no value and could be closed to future livestock use. The value of the allotments to aid in management flexibility (e.g., to be used during a drought) was part of that analysis. Grazing allotments, whether active or vacant, are presently available for dispersed recreation opportunities and this is not expected to change. No determination to graze any of the vacant allotments is being made at this time. All currently active allotments would continue to be grazed regardless of the alternative selected.

G53 Public Concern: The Forest Service should not close any vacant grazing allotments.

Response: The vacant allotment analysis as described in FEIS Volume 4, Appendix B – *Description of Analysis Process*, took into consideration the ability of each vacant allotment to provide for management flexibility, such as accessibility, capability to provide forage, adjacency to existing allotments and providing forage during drought. The allotments recommended for closure showed little value in those respects; the ones recommended for retention showed great value. Text has been added to Appendix B (FEIS Volume 4) to clarify decisions to close vacant allotments, as well as to display the adverse effects of closing vacant allotments and the loss of using livestock as a tool to manage vegetation.

G54 Public Concern: The Forest Service should close all vacant grazing allotments in Wilderness Areas.

Response: Where consistent with Forest Land and Resource Management Plans, Forest Service policy provides for forage to be made available to qualified livestock operators from lands that are suitable for livestock grazing (FSM 2203.1-6). The use of an area by domestic livestock does not preclude the use of that area for other uses. The 1964 Wilderness Act authorizes grazing within wilderness. Congressional guidelines for grazing within national forest wilderness areas state “To clarify any lingering doubts, the committee wishes to stress that this language means that there shall be no curtailment of grazing permits or privileges in an area simply because it is designated wilderness.”

G55 Public Concern: The Forest Service should reevaluate the criteria used in determining allotment closures.

Response: As described in FEIS Volume 4, Appendix B – *Description of Analysis Process*, the main criteria used to determine the closure or retention of vacant allotments were number of acres capable of supporting livestock, whether or not the area would aid management flexibility and access, and whether or not the area could be combined with an adjacent allotment to improve management. The other criteria were used to give the deciding official an idea of management complexity and to evaluate the various alternatives.

G56 Public Concern: Vacant allotments should be retained to provide management flexibility.

Response: Management flexibility is one of the criteria used to evaluate vacant allotments. Those determined to provide management flexibility were recommended for retention. Those providing little management flexibility due to limited access, limited suitable acres, long distances from active allotments were recommended for closure.

G57 Public Concern: Vacant allotments on the Dillon Ranger District should be closed.

Response: Allotments recommended for closure are identified FEIS Volume 4, Appendix B – *Description of Analysis Process*. Except for portions of Argentine, Corral and Searl Allotments, all vacant allotments mentioned are recommended for closure.

G58 Public Concern: The Forest Service should close the Park Creek Allotment.

Response: As shown in FEIS Volume 4, Appendix B – *Description of Analysis Process*, the Park Creek Allotment is recommended for full or partial closure in all alternatives except Alternative B**.**

G59 Public Concern: Vacant allotments should be closed due to potential damage to riparian areas.

Response: Forest-wide riparian standards and guidelines for livestock use in riparian areas provide for protection of riparian areas. These measures are considered adequate in FEIS Volume 5, Appendix N – *Biological Evaluation/Biological Assessment* and the Watershed Conservation Practices Handbook (FSH 2509.25) to protect riparian and aquatic resources. Specific grazing practices and livestock numbers that are found to be degrading or jeopardizing riparian habitat condition are addressed at the allotment management planning level.

G60 Public Concern: The Forest Service should close Allotment 40 (Horsethief Allotment).

Response: As shown on the vacant allotment maps included with the FEIS, the Horsethief Allotment is a cattle and horse allotment, not a cattle and sheep allotment. To reduce the confusion the designations for cattle and horse (C&H) and sheep and goat (S&G) was added to the Table B-28 (FEIS Volume 4, Appendix B – *Description of Analysis Process*. Since the Horsethief Allotment is a cattle allotment, there is no risk of disease transmission between domestic livestock and bighorn sheep.

The Horsethief Allotment, vacant since the 1950s, is recommended for closure in all alternatives (with the exception of Alternative B) due to low productivity, limited capable acres, little to no value to provide for management flexibility, and no demand. The recommendation to designate this area as an RNA is based on its good representation of a low-elevation ecosystem types and its present ecological condition. Significant populations of several rare plants and one federal Category 1 Candidate species exist within the area. This area also supports one of the four endemic bighorn sheep herds on the White River National Forest.

G61 Public Concern: The Forest Service should adjust Alternative I to close the most grazing allotments of any alternative.

Response: Alternative I was provided to the White River National Forest by a coalition of environmental groups. In their comments that accompanied this alternative, they looked at the value of retaining allotments and ranches to maintain open space and deer and elk winter range and to offset the impacts of development.

G62 Public Concern: The Forest Service should not retain vacant allotments for emergency use.

Response: The use of vacant allotments during drought years was one of the many factors analyzed to determine if an allotment should be closed or retained. Allowing livestock to spread out over larger areas will reduce the possibility of any given area being grazed to heavily. Without these areas of relief, many cattle would have to be returned to the base ranch, and possibly overuse areas that in many cases are deer and elk winter range.

Predator Control / Management

G63 Public Concern: The Forest Service should analyze the effects of carcass disposal on predation.

Response: Grazing practices, including the effects of carcass disposal on predation, are dealt with at the site-specific allotment management planning level, not at the forest planning level.

G64 Public Concern: The Forest Service should require ranchers to use non-lethal predator control methods.

Response: Predator control is under the authority of Animal and Plant Health Inspection Service – Wildlife Services, and as such, is outside the scope of this forest planning process.

G65 Public Concern: The Forest Service should revoke grazing permits of ranchers convicted of killing carnivores.

Response: The taking of game, including carnivores, is covered under state statutes. The terms and conditions of a term grazing permit include the following language: “This permit may be suspended or cancelled in whole or in part for conviction for failure to comply with Federal laws or regulation or State and local laws relating to livestock control and protection of air, water, soil and vegetation, fish and wildlife and other environmental values when exercising the grazing use authorized by the permit.”

G66 Public Concern: The Forest Service should consider alternatives before eliminating off-road travel in allotments for ranchers.

Response: Once the selected alternative has been chosen, a travel management plan will be developed for that alternative. Ranchers needing access to maintain or construct range improvements or manage the allotment need to identify those access needs. These site-specific needs will be analyzed during that process and alternatives will be evaluated.

G67 Public Concern: The Forest Service should complete a site-specific NEPA analysis before engaging in predator management activities.

Response: The relevant range standard in the 2002 Forest Plan (Chapter 2) states, "For animal damage control activities conducted by other governmental entities, the Forest Service will cooperate by providing mitigation measures to protect national forest resources. Mitigation measures emphasize protection of public safety, proposed, threatened, endangered and sensitive species: water quality and other resource values." The government entity responsible for predator control is the Animal and Plant Health Inspection Service – Wildlife Services (APHIS). While the NEPA responsibilities lie with APHIS, the White River National Forest coordinates with them during the NEPA process and on an annual basis as to their animal control efforts.

G68 Public Concern: The White River National Forest should not allow the aerial gunning of predators.

Response: Predator control is under the authority of Animal and Plant Health Inspection Service – Wildlife Services, and as such, is outside the scope of this forest planning process.

Section 6—Noxious Weeds

NW1 Public Concern: The Forest Service should take into consideration the effect of all Forest activities on the introduction of noxious weeds.

Response: The effects of Forest activities on the importation and spread of noxious weeds are discussed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*.

NW2 Public Concern: The Forest Service should take a species approach in controlling noxious weeds.

Response: As identified in Chapter 2, Section 3 of the 2002 Forest Plan, when setting priorities for the treatment of noxious weeds consideration is given to the species' rate of spread, invasions found within special management areas such as research natural areas and wilderness areas, and the probability that treatments will be successful. The priorities for controlling noxious weeds include preventing the introduction of new invaders, treating new invasions quickly, and containing and controlling established infestations. Management strategies and control methods are determined at the site-specific project level, not at the forest planning level.

NW3 Public Concern: The Forest Service should address the effects of wilderness designation on noxious weed control.

Response: The effects of wilderness designation on weed control are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*. Treatment of weeds within wilderness is accomplished utilizing an integrated noxious weed management plan that considers wilderness and other resource objectives.

NW4 Public Concern: Noxious weed management on the White River National Forest should emphasize burning over spraying.

Response: Integrated weed management allows the use of a single method or combination of methods to control noxious weed species. Infestations are evaluated on a site-specific basis, taking into consideration the target weed species, environmental factors and effective means of control. Burning is generally ineffective in providing control of many deep-rooted rhizomatous species. Burning often provides an inadequate impact to control these species (e.g., yellow toadflax and leafy spurge) and removes desirable vegetation. This allows for an increase in noxious weed establishment. In addition, fire removes litter and soil organic matter, making it easier for weed seeds to germinate and establish on a site. In many cases, the use of herbicides is the only known or practical means of controlling some species.

NW5 Public Concern: The Forest Service should provide adequate funding for noxious weed control in Pitkin County.

Response: Chapter 2 of the FEIS (Volume 2) includes a description the relationship between the alternatives and budget. The actual implementation of forest plans depends on budgets allocated from Congress. FEIS Table S-3 provides a relative comparison of budgets by alternative. Rangeland vegetation funds used for noxious weed treatment. Funds are allocated at the Forest level by Ranger District, not county.

NW6 Public Concern: Financing for weed control should be cooperative between local and federal governments.

Response: Financing for weed control is addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*. The control of noxious weeds is and will continue to be a cooperative program between local, state and federal agencies. This cooperative effort includes planning, inventory, treatment, monitoring, prevention and public education. As stated FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*, the Federal Noxious Weed Act (1974), as amended, requires cooperation with state, local and other federal agencies in the application and enforcement of all laws and regulations relating to the management and control of noxious weeds. Appendix C of the 2002 Forest Plan lists all the cooperative agreements and memorandums of understandings concerning noxious weed management. 2002 Forest Plan objectives (Chapter 1) and monitoring strategies (Chapter 4) ensure cooperation with other government and non-government agencies.

NW7 Public Concern: Native plants should not be replaced with exotic species.

Response: Biodiversity Standards in Chapter 2 of the 2002 Forest Plan provides for the use of native plant species during revegetation.

NW8 Public Concern: Total eradication of noxious weeds should be Forest Service priority.

Response: The goals, objectives and strategies for noxious weed management are addressed in 2002 Forest Plan Chapter 1 – *Ecosystem Health*, Goal 1, Objective 1d. 2002 Forest Plan Chapter 2, Section 2, biodiversity guidelines address use of native plant species for revegetation. Total eradication of all species of noxious weeds is not an attainable goal for all species of noxious weeds through the life of 2002 Forest Plan.

NW9 Public Concern: Grazing permittees should be held responsible for management of noxious weeds.

Response: As stated in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*, coordination with adjacent private landowners, local, county, state and federal agencies, as well as livestock and environmental organizations is critical to the success of noxious weed management. The Federal Noxious Weed Act requires cooperation with state, local and other federal agencies in the application and enforcement of all laws and regulations relating to the management and control of noxious weeds.

NW10 Public Concern: The Forest Service should address the effects of ski area expansion on the introduction of noxious weeds.

Response: The effects of ski area expansion on the spread of noxious weeds are addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*.

NW11 Public Concern: The Forest Service should provide locations of areas affected by noxious weeds.

Response: A general reference to where noxious weeds can be expected and a comparison of alternatives is addressed in FEIS Volume 2, Chapter 3, Topic 1, Part 3, Section 6 – *Noxious Weeds*. The mapping of noxious weeds is an ongoing process and has not yet been completed. Some of the larger infestations on the Forest include yellow toadflax in the Marvine, Hill Creek and Big Fish watersheds, as well as the Camp Hale area.

NW12 Public Concern: The use of the term "desirable non-native plants" should be clarified or eliminated.

Response: The term "desirable non-native" has been added to FEIS Volume 4, Appendix L – *Glossary*. This term includes non-invasive species used for revegetation when native seed is unavailable or economically impractical.

Section 7—Fire Management

FM1 Public Concern: The Forest Service should not allow fires to burn. – and –

FM2 Public Concern: The Forest Service should allow fires to burn naturally.

Response: We recognize the needs of the public for renewable resources, as well as the need for fire to play a more natural role in the ecosystem. In many cases, fire cannot be allowed to burn across the landscape because of risks to firefighter and public safety, resource values, and human development. In other cases, the risk to human safety and values is small enough and the benefit to the natural environment is great enough that we can allow and even encourage naturally occurring fires to run their course. Chapter 3, Part 3, Section 5 of the FEIS describes the fire management categories used to define

where on the landscape fires will be aggressively suppressed (Category A areas) and where fires may be allowed to play their natural role (Category C & D areas). Only when we have completed thorough planning and analysis for a given area will naturally occurring wildland fires be allowed to "run their course." This planning must consider a variety of factors in addition to human health and safety, such as ecosystem health, resource values, economics, and air quality. Once we have analyzed an area and identified it as appropriate for allowing fires to burn naturally, we then will complete additional analysis to delineate where and under what conditions such fires will be managed for resource benefit. Additional tiers of analysis are initiated at the time an ignition occurs must consider current and projected climatic factors, such as drought and unusual weather patterns. We decide how to respond to a particular ignition only after a fire is detected and an initial analysis is completed. We then document the decision to allow a fire to burn to achieve resource objectives in a fire-specific Wildland Fire Implementation Plan.

FM3 Public Concern: The Forest Service should reduce fuel loads.

Response: As discussed in Chapter 3, Part 3, Section 5 of the FEIS, we decide whether to implement a fuel load reduction treatment based on the resistance to control of the particular vegetation type, the likelihood of experiencing a fire, and the values that might be lost to a wildfire. When potential for loss of value to wildfire justifies the cost of implementing the treatment, we consider hazard fuel reduction as a cost effective management treatment. We utilize a variety of methods to reduce fuel hazards including traditional methods such as prescribed burning, thinning, piling and burning, lopping and scattering, and chipping and shredding. Until recently, prescribed fire applications in forested areas have been limited; however, because of recent changes in fire policy and fire management philosophy, emphasis on increased fuel management activities is underway at a national level. This increased emphasis needs to include a thorough analysis of resource and human values at risk, social/economic impacts, and the health and viability of the ecosystem. This emphasis on increased fuel management must also include cooperators, such as landowners, local, state, and federal agencies, and other interested parties, in the planning and public education processes.

FM4 Public Concern: The Forest Service should utilize prescribed fire as a management tool.

Response: We have utilized prescribed fire for habitat enhancement and ~~activity~~ fuels reduction for the past 25 to 30 years with the annual treatment acreages increasing at a gradual rate. We have long realized the importance of carefully applied prescribed fire in resource management activities and we hope to continue the use of prescribed fire while maintaining the cooperative management climate with our local, state, and federal cooperators, as well as those that may be impacted with smoke emissions.

FM5 Public Concern: The Forest Service should address the effects of Wilderness designation on fire control.

Response: We must adhere to all applicable regulations and policies stipulated by the Secretary of Agriculture and the Chief of the Forest Service with regard to fire management within congressionally designated wilderness. Chapter 3, Topic 5, Part 3—*Wilderness* of the FEIS states that "…the forces of nature (fire, insects, and disease, among many other phenomena) should be allowed to play a role in wilderness without

intervention, as long as they do not threaten resources and properties outside the wilderness boundary." In Chapter 3, Section 7 of the FEIS, existing wilderness and recommended wilderness are displayed as "Category D," where fire is managed to achieve the desired future condition for designated areas with health and safety considerations also taken into account. The fire management category assigned to any newly designated wilderness area will not automatically be a "D." The category assigned will reflect the management objectives for that particular area as well as the need to consider human health and safety.

FM6 Public Concern: The Forest Service should adopt the fire management protocols discussed in Alternative D.

Response: The Forest Service will analyze and consider the fire management protocols discussed in each alternative. A decision to select one alternative will be based on a variety of factors including the effects of that decision on the agencies ability to manage fuels and fire effectively.

FM7 Public Concern: The Forest Service should revise fire management plans.

Response: We updates our fire management plan and associated annual operating plans with cooperating agencies on an annual basis. Once the 2002 Forest Plan is approved, the annual update to the fire management plan will reflect the direction contained within it.

FM8 Public Concern: Single-track trails should be kept open as a means of access in fire emergencies.

Response: We recognize existing roads and trails may allow increased access for fire suppression forces, although we and our interagency fire suppression partners utilize not only ground-based firefighting forces but also those delivered by aircraft. The use of these forces is often dictated by the local, regional, and national fire situation, weather conditions, and availability of suppression resources. Chapter 3, Part 3, Section 5—*Wilderness* of the FEIS recognizes that travel corridors such as trails can have both positive and negative impacts to the fire management program. Access routes can facilitate travel for emergency personnel, and may increase human use which improves the detection and reporting of fires. With increased human use however, human-caused fire incidents will also increase. Effects on fire management resulting from closures or other proposed changes to trail systems will be analyzed on a case-by-case basis as part of the site-specific analysis of such proposed actions.

FM9 Public Concern: The FEIS should not create fuel breaks through deforestation.

Response: Fuel breaks are generally not suitable for implementation on the White River National Forest because they are relatively ineffective in the fuel models of the forested areas common to this area of Colorado and are often expensive to create and maintain. Despite the expense of creating and maintaining fuel breaks, we recognize that there are instances where fuel breaks can provide a measure of protection for high value areas such as homes, municipal watersheds, developed campgrounds, or other significant investements. Specific approaches to fuel management are not prescribed in the 2002 Forest Plan. As discussed in Chapter 3, Topic 1, Part 3, Section 7—*Fire Management* of the FEIS, we will base decisions on whether to implement fuel load reduction treatments on the resistance to control of the particular vegetation type, the likelihood of experiencing a fire, and the values that might be lost to a wildfire. When potential for loss

of value to wildfire justifies the cost of implementing the treatment, we consider hazard fuel reduction to be a cost-effective management treatment. The particular manner in which we create a fuel break will be addressed in site-specific analysis conducted for the proposed project and is not prescribed in the 2002 Forest Plan.

FM10 Public Concern: The Forest Service should address the effect of fire management and prolonged drought on new fire management plans.

Response: Management activities and climatic factors are integral components of any fire management decision. We utilize several drought indicators when making decisions on the appropriate management response to wildland fires and implementing prescribed fire. The decision process for each application of fire on the landscape requires the agency to evaluate land management activities as well as natural phenomena, such as drought and insect and disease outbreaks.

FM11 Public Concern: The plan should analyze the compliance of the FEIS with the Federal Wildland Fire Management Policy.

Response: We manage all wildland fire in accordance with appropriate policies and regulations, including the Forest Service Manual and the Federal Wildland Fire Management Policy. In addition, we operate under a forest-specific fire management plan that is updated annually and accurately depicts additions, deletions, and amendments to the Forest Service Manual and associated Forest Service Handbooks.

FM12 Public Concern: The FEIS should not state that forest openings created by logging reduce fire spread.

Response: Forest openings created by logging may or may not contribute to a reduction in fire spread depending on a number of variables including pre-harvest forest condition, post-harvest forest condition, harvest system used, and climate patterns. FEIS Chapter 3, Topic 1, Part 3, Section 7—*Fire Management* recognizes that post-logging residues can increase forest flammability if left untreated. The FEIS also recognizes that openings in the forest canopy can reduce fire's ability to transition from a surface fire to a crown fire thus reducing spread rates and spread distance over time. We recognize that fire behavior is a variable phenomenon and forest management practices can affect the environmental factors that influence a given fire's spread and intensity in a variety of ways. Forest-wide, fuels, topographic, and climatic conditions vary considerably and do not lend themselves well to large, landscape-scale analysis. Because of the variability of these factors and the diverse manner in which they affect fire behavior, we initiate a thorough analysis of fuels and fire behavior on a site-specific basis during specific project planning.

FM13 Public Concern: The Forest Service should address the effects of road density on fire frequency.

Response: There is little correlation between road density and fire frequency on the White River National Forest within the last 30 years. Fire records from 1970 to 1999 indicate 1,122 fires occurred on National Forest System lands managed by the White River National Forest—the majority of these fires were not directly associated with roads or road use. Although road use and fire prevention are key components to land management decisions, the current and projected use of forest roads and trails does not indicate a significant wildfire threat that needs to be addressed in a forest plan document.

The issue of road density and fire risk is a site-specific criterion to be addressed during individual project analysis.

FM14 Public Concern: The Forest Service should demonstrate proper fuel and vegetation management to homeowners.

Response: We and our interagency fire management partners recognize and stress firefighter and public safety above all else. Research has shown, however, that the most important zone to consider when designing protection plans for home sites is in the immediate vicinity of the home. In the cumulative effects section of the FEIS in Chapter 3, Topic 1, Part 3, Section 7—*Fire Management*, we recognize that the public must shoulder some, if not most, of the responsibility for protecting their homes from wildfire. We actively pursue partnerships in all phases of fire management, including fuels management. As a service agency, we work with state and local cooperators to encourage landowners to utilize "fire-wise" landscaping practices. Through federal grants, the we lend expertise in planning vegetation treatments as well as financial assistance to homeowners who wish employ "fire-wise" landscaping, in conjunction with the Colorado State Forest Service.

FM15 Public Concern: The FEIS should disclose the ecological and environmental effects from the commitment to future fire suppression.

Response: In many cases, the forested lands of the White River National Forest are still within the historic range of variability (HRV) and have been relatively unchanged due to fire suppression. The lower elevation shrub and piñon-juniper woodlands, however, may have already moved outside the HRV because of fire suppression actions taken over the last 80 to 100 years. It is clear that emphasis on returning these lands to a more natural fire cycle is important; however, these decisions must be tempered with the realization that these vegetative types are frequently adjacent to high value private properties and watersheds where the implementation of a natural fire program is not feasible. In these areas, other management actions may be required rather than returning fire to the ecosystem through the use of prescribed or naturally occurring fires.

We utilize fuel treatments in addition to fire suppression to manage wildland fire within National Forest System lands. Fire suppression levels are expected to remain the same because the numbers of ignitions that have historically occurred on the Forest are not expected to change significantly. Alternative suppression actions may change depending upon various conditions found across the landscape as well as safety considerations, fuel types, climatic conditions, and proximity to private lands. While the number of suppression actions will likely remain the same; the level of suppression action is variable—ranging from aggressive control actions to limit size and resource impacts to allowing fire to play a natural role in the ecosystem. These decisions will be guided in principle by appropriate agency policy, guidelines, and resource management plan direction as set fourth in the 2002 Forest Plan. The driving forces in determining the appropriate management response include weather, drought conditions, the regional, and national fire situation, and other factors that can only be determined when a given fire is discovered. We decide how to respond to a particular ignition only after a fire is detected and an initial analysis is completed. We then document the decision to allow a fire to burn to achieve resource objectives in a fire-specific Wildland Fire Implementation Plan.

FM16 Public Concern: The FEIS should provide predictions of fire events for each alternative.

Response: The ignition rate of wildland fires for the White River National Forest is relatively low when compared to other national forests. It is difficult to model fires and acreages burned by alternative when an annual average of only 45 fires are detected on the forest, with at least one-third of those fires started by lightning. In addition, the fire management emphasis components for each alternative are relatively similar, thereby reducing the value of comparing alternatives with respect to fire management. We utilize various analysis tools to manage wildland fires that occur within existing and approved wildland fire use areas or for performing risk assessments on site-specific area plans. As stated in the FEIS Chapter 3, Topic 1, Part 3, Section 7—*Fire Management*, fire occurance, either by lightning or human causes, is difficult to predict. There are models in development that may someday allow us to provide such predictions for a variety of alternatives, however at present there are no accepted methods for predicting the occurance of future fire events over the scale of an entire forest, thus it is not yet within the capabilities of science to attempt such prognostications.

FM17 Public Concern: The Forest Service should use fire ecology when developing fire management plans and prescriptions.

Response: Fire ecology is probably the most important criterion in the development of fire management plans, including fuels treatment implementation plans. During formulation of burn plans and other site-specific vegetation treatments, we consider the ecology of the plant and animal species involved, along with the effects of fire on those species, and design prescriptions with fire effects and ecology in mind.

FM18 Public Concern: The FEIS should disclose how fire management plans will restore and protect fire dependent communities.

Response: We do not intend to suppress all wildland fires; rather we intend to utilize a mix of fire suppression, prescribed fire, and wildland fire to manage fires on the landscape. In some cases, such as areas where significant human development has occurred, fire suppression is the only viable option left. In other cases, the use of prescribed fire and wildland fire use will be the preferred options; however, these must be performed with care and thorough planning. Our Fire Management Plan is annually updated and is governed by the overall management theme of the 2002 Forest Plan, as are the site-specific area fire use plans that govern the use of unplanned ignitions to achieve resource objectives including restoration and maintenance of fire adapted ecosystems. We may also use prescribed fire as well as mechanical vegetation treatments to achieve resource objectives such as restoration of fire-adapted ecosystems. Proposed treatments will undergo the appropriate level of environmental analysis including intra/interagency coordination, public notification, and public comment. The purpose of the FEIS and the 2002 Forest Plan is not to provide specifics for management, but rather guidance for formulation of those operational plans. We outline the specifics of how the restoration or protection of fire-adapted ecosystems will actually be achieved in fire management plans as well as in the site-specific analysis and implementation plans created for proposed treatment areas.

TOPIC 2
TRAVEL MANAGEMENT

Part 1—Travel Management and Infrastructure

General

TM1 Public Concern: The White River National Forest infrastructure standards should be expanded.

Response: We determined that not every management area required a road density standard in order to implement or achieve the desired future condition. Some management areas do, however, have road density standards. In addition, all forest-wide standards and guidelines (2002 Forest Plan Chapter 2) must be applied to projects—including the infrastructure direction (road and trail management) and wildlife management.

In management area prescription 5.43 (Elk habitat) there is a guideline "1. Travelways open to motorized travel will not exceed an average travelway density of one-half mile per square mile during seasonal periods when the area is designated for calving, migration, winter, or summer habitat (see Wildlife Guideline 2)." There are other standards and guidelines throughout the 2002 Forest Plan that specify types of roads and their locations in order to manage wildlife habitat.

For all species, road density considerations are made when projects are initiated for additional roads, and road closures prior to any construction. Part of the NEPA process is for wildlife biologist to examine the impacts of the project on the wildlife and its habitat.

Under the 2002 Forest Plan Chapter 2 – *Administrative*, *Travel System Infrastructure*, there is a guideline that states "3. Emphasize maintenance and reconstruction of the existing road and trail system to standard." In order for this to be a standard we would have to have all roads and trails to standard at all times as soon as the 2002 Forest Plan was implemented. Although this would be ideal it is not realistic to assume all roads and trails can be to standard at all times due to wear and weather. It is realistic though to have a goal of bringing all roads and trails to standard and this is what the Forest Service tries to indeed achieve.

There is no standard that applies to the posting of signs. There is however an agreement between the Colorado State Parks and the Forest Service in Colorado for standard signs to be placed at trailheads.

TM2 Public Concern: The White River National Forest should re-word infrastructure standard #1.

Response: The standard has not been changed. Monitoring is a requirement through Forest Service Directives. Forest Service Handbook 7309.1 – *Buildings and Related Facilities Handbook*, discusses the necessity and procedures for having a facility maintenance plan for each facility.

TM3 Public Concern: Travel Management Plan administrative Guidelines #1 and #4 should be Standards.

Response: Guideline #1 describes considerations for seasonal closures. This is a guideline because each situation that requires seasonal closure is due to unique characteristics. This allows managers the flexibility to apply seasonal closures as deemed necessary. The Guideline lists factors that managers must evaluate when considering seasonal closures. Guideline #4 no longer exists. It has been superceded by a new Standard in the 2002 Forest Plan that states, "on lands that are snow-free, motorized and mechanized travel will be prohibited outside of designated travelways." Please refer to the 2002 Forest Plan Chapter 2 – *Administrative*, for the specific wording of these two directions.

TM4 Public Concern: The White River National Forest should revise forest wide infrastructure Standard #2 to assure consistency with Standard #3 and the DEIS.

Response: Infrastructure Standards #2 and #3 have been revised. For the final wording, please refer to the 2002 Forest Plan, Chapter 2 – *Administrative*, Standards #2 and #3. In particular, the phrase "Forest Visitor Map" was removed and replaced with the statement "on lands that are snow-free, motorized and mechanized travel will be prohibited outside of designated travelways." The Forest Service in Region 2 maintains an open unless closed policy on designated routes (meaning routes are open to use unless they are specifically closed). However the Forest Service reserves the right to close routes if conditions warrant.

TM5 Public Concern: The White River National Forest should eliminate travel management strategy 69.

Response: This strategy was in error and will not be used in the Travel Management Plan.

TM6 Public Concern: The White River National Forest travel management prescriptions should be finalized after selection of the final plan.

Response: After the final management prescriptions are adopted we will prepare several travel management alternatives based on the 2002 Forest Plan. The travel management alternatives will be presented to the public in an Environmental Impact Statement. The travel management alternatives will either be in compliance with the 2002 Forest Plan management area map, or propose specific amendments to the Forest Plan. There will be opportunities for public involvement and comment on the Draft Travel Management Plan.

TM7 Public Concern: The White River National Forest should assess sustaining or not sustaining the trail and road network.

Response: The Travel Management Plan has been separated from the 2002 Forest Plan and will be initiated upon the approval of the 2002 Forest Plan. The road and trail network will be analyzed in much greater detail in the Travel Management Plan.

Evaluating the uses and needs of each road and trail in the transportation plan determines the needs to sustain or not sustain certain roads and trails. Through project level, and

watershed evaluations roads and trails are examined for their needs and thus "sustainability."

TM8 Public Concern: The Final EIS should present additional information on transportation infrastructure.

Response: All information appropriate to travel management decisions is included in the FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*.

TM9 Public Concern: The Travel Management Plan should consider rare plant species preservation.

Response: The Travel Management Plan will consider rare plant species preservation. The 2002 Forest Plan restricts snow-free motorized and mechanized travel to designated routes. See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Resource Protection*, for a discussion on the reasons pertaining to rare plant preservation.

TM10 Public Concern: The White River National Forest should produce travel maps that overlay habitat and species information.

Response: Various assessments were performed to complete the analysis presented in Chapter 3 of the FEIS. Please see FEIS Volume 2, Chapter 3, Topic 1, Part 3 – *Biological Element*, for information regarding species habitat and effects on species from travel management activities. Unfortunately it was cost prohibitive to produce maps that overlay each species with travel management information. The most complete collection of information regarding species habitat and travel management is available from the wildlife biology department of the White River National Forest.

TM11 Public Concern: The travel management plan should be re-designed to minimize environmental damage.

Response: A separate Travel Management Plan will be initiated upon approval of the 2002 Forest Plan. One of the factors in the Travel Management Plan will be to look at roads that could be decommissioned for a variety of reasons; these include environmental degradation and redundancy/duplication of access. Another goal of the Travel Management Plan will be to designate "ways" (unclassified roads and trails) as either part of the system or recommended for obliteration.

The Travel Management Plan will concentrate on the existing road and trail system. The objective is to examine the system in place and how to manage that system. New road and trail construction are done at a project level when there is a need and funding to produce them. Prior to construction of any new roads or trails, proposed routes are evaluated for alignment within the existing system and possible cumulative impacts within the construction corridor as well as the adjacent area.

Further, seasonal restrictions are established in Guideline #1 of the 2002 Forest Plan Travel Management section (Chapter 2 – *Administrative*). Guideline #1 describes the parameters for considering seasonal restrictions based on resource conditions—including such factors as adverse impacts to wildlife and environmental damage. Seasonal restrictions will be further examined during the process of developing the Travel Management Plan.

TM12 Public Concern: The White River National Forest should not equate the effects of roads and trails on wildlife.

Response: There are times when it is appropriate to analyze effects of roads and trails together on wildlife when the overall impacts are similar, such as fragmentation, general disruption, and when the analysis is at a programmatic level such as this one. When a project (or a more specific geographic area) is examined, it is then more practical to include further elements in the analysis such as types of use and site-specific data. Some analyses do separate roads and trails when appropriate. When performing an analysis all elements are examined, the analysis process is then developed, then ran. Without knowing the specific analysis in question it is difficult to determine why the effects of roads and trails should or should not be separated.

TM13 Public Concern: The White River National Forest should separate uses temporally. –and –

TM14 Public Concern: The White River National Forest should develop mixed use areas.

Response: The Travel Management Plan will be initiated upon approval of the 2002 Forest Plan. Decisions regarding separate or concurrent use will be determined through site-specific analyses conducted for the Travel Management Plan. The 2002 Forest Plan will set the stage for the Travel Management Plan by designating management area allocations. Each management area is defined by prescriptions that allow certain uses (or mix of uses) while some also include prohibitions of specific uses. Please see the 2002 Forest Plan (Chapter 3 – *Management Area Direction*) for a description of what uses are allowed and not allowed in each management area.

TM15 Public Concern: The White River National Forest should plan for new recreation technologies.

Response: Although it is impossible for the Forest Service to predict all travel technology developments (and eventual level of popularity), we try to reasonably anticipate these trends and be responsive to public needs. Please refer to FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Future Trends*, for more information on our analysis. The 2002 Forest Plan restricts all mechanized and motorized travel to designated routes. The Forest Plan will need to be amended if technologies are invented that are not reasonably covered by Forest Plan's direction for management of motorized or mechanized travel.

TM16 Public Concern: The White River National Forest should consider multiple forms of user education. – and –

TM17 Public Concern: White River National Forest user education efforts should focus on out of state visitors.

Response: The Forest Service uses many methods to educate the public regarding use and enjoyment of National Forest System lands—including brochures, newspaper articles, school visits, hiking programs, TV, bulletin boards, and visitor centers both locally and nationally. These programs are effective and will continue to be used and developed. If one has a specific idea contact the public relations department of the White River National Forest.

TM18 Public Concern: The White River National Forest should collaborate with recreation groups and the local public.

Response: The Travel Management Plan will be initiated upon completion of the 2002 Forest Plan. During the Travel Management planning process, forest staff will work with recreation groups and all other interested parties on the transportation system desired and necessary for the White River National Forest. Planning considerations encompass recreation needs, wildlife requirements, and future management of the land.

TM19 Public Concern: The White River National Forest should develop specific conditions for trail system partnerships with user groups.

Response: The Forest Plan does not make any decisions directly affecting partnership agreements. Partnerships are expected to continue and expand when opportunities arise. The White River National Forest welcomes those who may be interested in trail partnerships. For those who may be interested please contact the Recreation department at the White River National Forest Supervisor's Office.

TM20 Public Concern: White River National Forest partnerships for travel management funding should require long-term maintenance commitments.

Response: Currently, we have long-term partnerships with local counties for road maintenance. Partnerships with user groups are each unique and address a specific set of issues or activities. These are done at a site-specific level, through the interested party and the Forest Service.

TM21 Public Concern: The White River National Forest should define "designated route."

Response: Designated routes are those routes that are numbered and classified. See the definition of classified road in the FEIS Volume 4, Appendix L – *Glossary.*

TM22 Public Concern: The Final EIS should clarify how "total system miles" are determined.

Response: Total miles are determined from information based on the inventory stored in the INFRA-Oracle database. The FEIS Travel System tables have been corrected to be clearer.

TM23 Public Concern: The White River National Forest should clarify appendix O.

Response: Appendix O is not included in the FEIS. Some form of Appendix O will be included in the Travel Management Plan, to be initiated upon approval of the 2002 Forest Plan. Any items that need to be clarified will be done.

TM24 Public Concern: The Travel Management Plan should present correct information in use tables.

Response: The Travel Management Plan has been separated from the Forest Plan. Upon approval of the 2002 Forest Plan, we will begin work on the Travel Management Plan. The Travel Management Plan will contain correct information regarding roads and trails and uses. Travel use tables in the FEIS have been reviewed and corrected in response to this concern.

TM25 Public Concern: The Final EIS should eliminate inconsistencies between federal law and the proposed management plan.

Response: The 2002 Forest Plan cannot, and does not, change or contradict federal law. It is meant to implement federal law, and to provide specific direction for the White River National Forest. The Forest Service has interpreted laws through the directive system (Forest Service Manuals and Handbooks). Individual forests, such as the White River, implement the directive system and agency policies.

Specifically, there is no direction in the 2002 Forest Plan that is inconsistent with the Alaska National Interest Lands Conservation Act (ANILCA). FEIS Volume 2, Chapter 3, Topic 2, Part 3 – *Special Use Authorizations*, specifically mentions ANILCA and that we will abide by these laws and regulations. In the Preface of the 2002 Forest Plan is a section titled "Valid Existing Rights," which further explains how the Forest Service will recognize rights.

TM26 Public Concern: The White River National Forest should ensure consistency between its travel management plans and those on adjacent public lands.

Response: The Forest Service attempts to be consistent with adjacent public and private lands by edge matching maps, and working directly with its neighbors. However, land managers and private land owners frequently have different goals and objectives for the lands they own or administer, as well as different constituencies. In addition, these same lands may have considerably different physical characteristics and constraints. These differences frequently lead to what appear to be inconsistencies when in fact the differences make good sense with closer examination. The Forest Plan provides direction to continue to work with other government agencies, local communities, and interested parties on issues of concern (see 2002 Forest Plan, Chapter 1, Goal 5). The Forest Service can only make decisions regarding National Forest System lands. In addition, the White River Forest Plan only pertains to the White River National Forest, not any other unit of the National Forest System. Coordination and planning with other national forests and with other agencies is an ongoing activity that will continue.

TM27 Public Concern: The Forest Service should eliminate discrepancies between management area allocations and winter travel management plans.

Response: The Travel Management Plan will include area strategies and route designations. Both area strategies and route designation will have to be in compliance with management area direction in the 2002 Forest Plan. Winter travel management will utilize management area strategies from the selected alternative, Recreation Opportunity Spectrum (ROS) designations, wildlife and ecological strategies. There should be no discrepancies between the management area allocations and winter travel management when it is completed.

TM28 Public Concern: The White River National Forest should correct discrepancies between the Draft EIS and the Land and Resource Management Plan.

Response: For summer use (snow-free) designated routes are open for travel unless specifically closed. Off-road or trail travel is closed unless specifically designated as open. Winter use is open unless specified closed. See forest-wide standard and guidelines (2002 Forest Plan, Chapter 2 – *Administrative*) for particular language that was modified for clarity.

TM29 Public Concern: The White River National Forest should consider an adequate range of alternatives for a site specific Travel Management Plan.

Response: Following approval of the 2002 Forest Plan work will begin on a site-specific travel management plan. The Travel Management Plan will include the preparation of an Environmental Impact Statement that will analyze a range of alternatives as dictated by NEPA. All alternatives will either be in compliance with the management area and forest-wide direction found in the 2002 Forest Plan or will initiate a Forest Plan Amendment if the Forest Service determines that a new direction is warranted.

TM30 Public Concern: The White River National Forest should streamline the travel system.

Response: Through a subsequent Travel Management Plan, the Forest Service will examine the current travel system for efficency, while still providing access and recreation for the public and government agencies. See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, Summary, National Forest Sytem Roads, Trails, Ways, and Environmental Consequences sections.

TM31 Public Concern: The White River National Forest should consider original CDOW travel management staff recommendations rather than the version censored by DNR.

Response: All comments were reviewed as part of the content analysis process described in the beginning of this appendix. Therefore, the original Colorado Division of Wildlife comments and those from the Department of Natural Resources were both reviewed and considered. The site-specific aspects of these comments (on individual roads and trails) will be forwarded to the Travel Management Plan id team and district personnel.

TM32 Public Concern: The White River National Forest should incorporate travel suggestions from the White River Forest Alliance.

Response: The maps and recommendations of the White River Alliance were reviewed and where possible incorporated into the alternatives. These will also be used after the 2002 Forest Plan is adopted to help develop alternatives for the Travel Management Plan.

TM33 Public Concern: Designated routes should be shown on maps.

Response: Winter travel management maps, as part of the travel management plan will display snowmobile routes where travel is restricted to designated routes only.

TM34 Public Concern: The White River National Forest should correct discrepancies between the Draft EIS and winter travel management maps.

Response: Although not presented in the 2002 Forest Plan, any discrepancies in the draft will be corrected in the Travel Management Plan. The comments received on the Draft Forest Plan pertaining to travel management, including winter travel maps, will be forwarded forwarded to the Travel Management Plan ID team and considered in the Travel Management Plan.

TM35 Public Concern: The White River National Forest should design improved Travel management maps.

Response: Due to production costs the travel maps were limited in what could be shown and in the use of color. We hope to be able and produce useful maps, with more clarity for final production in the Travel Management Plan.

TM36 Public Concern: Errors in travel management maps should be corrected.

Response: Maps are corrected as errors are brought to light. One has to remember a map represents geographic features, along with other features for reference. Scale, types of use, publication abilities, and mapping techniques vary from map to map. Maps do not set policy or boundaries; they represent these elements within the limitations of reproduction capabilities. Additional maps will be prepared for the Travel Management Plan. When it comes to mapping non-motorized and Wilderness boundaries the Forest Service tries to utilize topographic features that can be related to the ground.

TM37 Public Concern: The White River National Forest should ensure travel management maps and signs on the ground are consistent.

Response: We will continue our current program to post signs correctly and in key locations, as well as to correlate maps to represent correctly what is on the ground.

TM38 Public Concern: The Forest Service should not adopt a limited use designation for the high country east of Breckenridge.

Response: In the Alternative K, the preferred alternative, this area is designated to be 1.31 (Non-motorized recreation). Please refer to the Alternative K map (2002 Forest Plan, Chapter 3 – *Management Area Direction*). This calls for roads to be converted to trails or closed and obliterated. We feel that this prescription fits the needs of the area designated backcountry recreation, non-motorized use. This does provide access—though non-motorized—solitude, and views of the scenery.

TM39 Public Concern: Travel management should be less restrictive in urban interface areas.

Response: Some areas near urban interfaces require restrictions because of impacts to the area, including impacts to private land, wildlife habitat, and other resources. Each area is examined for its unique characteristics, and restrictions are applied if necessary.

Section 1—Travel Access

TM40 Public Concern: Off-highway vehicle trail closures should comply with Forest Service standards and guidelines for early successional species.

Response: The 2002 Forest Plan restricts snow-free motorized and mechanized travel to designated routes.

TM41 Public Concern: The White River National Forest should select an alternative that respects the rights of the disabled. – and –

TM42 Public Concern: The White River National Forest should ensure access to the elderly and disabled by developing multiple forms of access.

Response: OHV access for persons with disabilities was defined in a recent document produced by Janet Zeller, Interim National Accessibility Program Manager. "There is no legal requirements to permit a person with disability to utilize an OHV in any area that restricts or prohibits OHV use under the Forest Plan or the Forest Travel Plan/Transportation Plan." The rules for off road travel or restricted areas for motorized travel apply to all equally. As far as providing recreational experiences for disabled or elderly persons, the Forest Service is very committed to constructing facilities, trails, and having areas available for people to experience opportunities on the Forest. Wheelchairs are not limited to designated routes. Wheelchairs are free to go anywhere on the White River National Forest. In all management areas in which motorized uses are prohibited, an exception is made for users of motorized wheelchairs. The same applies for mechanized wheelchairs. See 2002 Forest Plan Preface.

TM43 Public Concern: Motorized tours for the elderly and handicapped should be the only form of motorized travel allowed on the White River National Forest.

Response: The Forest Service mission is one of providing for use of a forest's multiple resources. Therefore, we will not completely eliminate motorized vehicle use from the White River National Forest, but try to provide an environmentally sound opportunity for such use.

TM44 Public Concern: The White River National Forest should evaluate the social justice issues surrounding motorized and non-motorized recreation opportunities.

Response: The Communities section of FEIS Volume 2 (Chapter 3, Topic 7) discusses in great detail the values of the population. While recreation is an important value, the most important value was "to protect the forest environments and everything that lives in them," next listed was to have forests for future generations. The Forest Service seeks a balance to accomplish these goals and the goal of providing recreation. Part of this balance is to provide for both motorized and non-motorized opportunities while protecting the elements that make up the White River National Forest. The White River National Forest does provide an extensive road and trail system for motorized use. Environmental justice was analyzed in the FEIS—see Volume 2, Chapter 3, Topic 7, Part 1, Section 2 – *Economics*, for this information. Recreation demand was considered in FEIS Volume 2, Chapter 3, Topic 3 – *Recreation.*

TM45 Public Concern: The White River National Forest should support mass transit to provide recreation opportunities on the national forest.

Response: Mass transit is an issue that encompasses many agencies, governments, communities, and corporations. One example of mass transit use all ready permited on the forest is the RTD bus access to Maroon Bells in the summer. The White River National Forest would look at each situation for proposed mass transit access and evaluate them as they are proposed. This type of use is done through special use permits

or agreements. For further information contact the Agreement Specialist at the White River National Forest Supervisor's Office.

TM46 Public Concern: The White River National Forest should maintain motorized access for forest management.

Response: The Forest Service is able to manage lands where motorized access is not allowed. Use of mules, horses and foot travel are modes of travel used by our employees who need access to execute land management. Wilderness areas require different types of management practices than areas outside of Wilderness. There are provisions in place that allow special permissions to be granted for permittees and administration access when deemed necessary. The White River National Forest does and will continue to provide motorized access as a condition of certain permits for specified permit administration activities. Selection of areas where this use is allowed is based on need, environmental protection, ability for maintenance, and a balance of uses.

TM47 Public Concern: The Final EIS should include a standard that prohibits motorized access from private roads.

Response: The 2002 Forest Plan (Chapter 2, Section 5 – *Administrative*) dictates that during snow-free periods motorized access from private roads will be restricted to designated roads and trails.

TM48 Public Concern: The White River National Forest should consider implementing a "closed unless posted open" policy.

Response: The Forest Service in Region 2 maintains an open unless closed policy for use of designated routes. However the Forest Service reserves the right to close routes if conditions warrant. Both the 2002 Forest Plan and FEIS reflect this policy (2002 Forest Plan, Chapter 2 – *Administrative*, Standard #2 or #3; FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Environmental Consquenses* and *Resource Protection*.

TM49 Public Concern: The White River National Forest should keep roads and trails open for emergency response.

Response: The 2002 Forest Plan (Chapter 2 – *Administrative*, Standard #4) establishes a road closure exception for emergency purposes. All road closures (including those within wilderness areas) allow access for emergency response with permission. Negotiated agreements between the Forest Service and county sheriff departments address this issue to ensure timely responses.

TM50 Public Concern: White River National Forest motorized restrictions should be implemented gradually.

Response: The 2002 Forest Plan outlines both motorized access restrictions and opportunities on the White River National Forest. Implementation for some of the roads and trails will be implemented at the signing of the Record of Decision with a subsequent travel order. The travel management plan will go further to define at a site-specific level travel uses on the roads and trails and areas in the forest.

TM51 Public Concern: The White River National Forest should increase semi-primitive motorized opportunities.

Response: The 2002 Forest Plan designates areas for semi-primitive motorized access as well as designating semi-primitive non-motorized areas. A comparison of semi-primitive opportunities is presented in FEIS Volume 2, Chapter 3, Topic 3, Part 1 – *Recreation Management*. The Forest Service seeks to provide a wide variety and reasonable balance of recreational experiences.

TM52 Public Concern: The Final EIS should include Standards and Guidelines for regulating motorized access.

Response: The 2002 Forest Plan (Chapter 2 – *Administrative*, *Infrastructure*) contains forest-wide Standards and Guidelines specific to travel on the White River National Forest. The infrastructure sections of the 2002 Forest Plan (Chapter 3 – *Management Area Direction*) present additional information for each management area prescription and also contain the forest-wide Standards and Guidelines previously mentioned.

TM53 Public Concern: The White River National Forest should consider the appropriate level of restriction for motorized travel.

Response: In the 2002 Forest Plan the Forest Service presents Standards and Guidelines that outline programmatic levels of uses and restrictions for travel (Chapter 2 – *Administrative*, *Infrastructure*). This system allows for various uses in appropriate settings and manners, while providing for ways to minimize impacts due to these uses.

TM54 Public Concern: The White River National Forest should consider restricting motorized travel from specific areas.

Response: In completeing the 2002 Forest Plan, many factors were considered in designating management area allocations. Whether or not motorized use is compatible with the primary resource objectives for an area was one of the factors in these considerations. Other factors included historical use, proximity to other features, other management needs for access, etc. In some cases it is appropriate to have multiple designations for one area.

Some areas adjacent to the wilderness are allocated to non-motorized management prescriptions. In particular, some of these areas are designated as roadless. A very small percentage of areas adjacent to the wilderness are allocated to motorized management prescriptions to allow wilderness access for authorized activities.

TM55 Public Concern: The White River National Forest should allow motorized travel.

Response: Existing travel management policies allow some off-road travel. This practice has resulted in the creation of many miles of non-system roads and trails. The 2002 Forest Plan restricts travel to designated routes in an attempt to reduce resource damage while maintaining the motorized recreation experience. The Forest Service maintains over 2000 miles of motorized routes on the White River National Forest to provide for motorized recreation opportunities. The Forest Service acknowledges the necessity to provide for motorized use and will continue to do so as long such use coincides with resource protection objectives and other legitimate forest uses.

TM56 Public Concern: The White River National Forest should ensure compliance with 36 CFR 261 and 295 and Executive Order 11989.

Response: The White River National Forest does comply and will continue to comply with 36 CFR 261, 295 and EO 11989. Under the selected alternative there will be no off-road motorized or mechanized travel unless approved with a special order. See 2002 Forest Plan, Chapter 2 – *Adminstrative*.

TM57 Public Concern: The White River National Forest should require mufflers and spark arrestors for motorized vehicles.

Response: 36 CFR 261.52 states, "Fire. When provided by an order the following are prohibited: (j) Operating or using any internal or external compustion engine without a spark arresting devise properly install, maintained and in effective working order …" Therefore a fire order would be required to implement this concern.

TM58 Public Concern: The White River National Forest should restrict travel in specific areas to designated routes only.

Response: The 2002 Foret Plan establishes a forest-wide Standard (Chapter 2 – *Administrative*) that restricts all motorized and mechanized travel to designated routes during snow free periods. Please refer to the 2002 Forest Plan for the exact wording and context.

TM59 Public Concern: The White River National Forest should ban motorized off-road travel in environmentally sensitive areas. – and –

TM60 Public Concern: The White River National Forest should adopt forestwide infrastructure standard #3 for motorized and mechanized travel.

Response: The 2002 Forest Plan establishes a forest-wide Standard (Chapter 2 – *Administrative*) that restricts all motorized and mechanized travel to designated routes during snow free periods. Please refer to the 2002 Forest Plan for the exact wording and context. In addition, please refer to FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Resource Protection Measures*) for additional information supporting the Forest Plan's restrictions on off-road travel.

TM61 Public Concern: The Final EIS should provide more information on illegal off-road travel.

Response: White River National Forest law enforcement officials maintain records for tickets issued due to illegal off-road travel. Evidence of non-system roads are revealed through the tracks and roadways left behind that were never constructed under Forest Service instruction and are not part of the inventory. The FEIS does not direct much discussion on the illegal use of off-road travel. It is felt that management practices should be based on science and the best use of the land to serve the public; not based on those who violate the rules and laws.

TM62 Public Concern: The White River National Forest should create a "Rules of the Forest" booklet so car manufacturers can discourage off-road travel.

Response: This concern is outside the scope of the Forest Plan. Such activities would be approached through a national Forest Service initiative—not the individual forest planning process. However, it should be noted that there are ongoing public relations

activities regarding travel and use of National Forest System lands. One can contact the public relations department on the White River National Forest to see what more can be done.

TM63 Public Concern: The White River National Forest should restrict aircraft.

Response: This concern is outside the scope of the Forest Plan. The Forest Plan does not contain any specific direction regarding aircraft restrictions. However, there are other sources for direction on aircraft management such as law, regulation, and policy. Please contact the Federal Aviation Administration for more information.

TM64 Public Concern: The White River National Forest should develop a limited number of off-road fee areas.

Response: This is not a programmatic designation. However, this is an idea that may be able to be carried forth through a special use permit, if someone proposed such an action. An administrative decision would need to be conducted through the NEPA process. This would need to be presented to the recreation staff of the White River National Forest, and the effected Ranger District.

TM65 Public Concern: The White River National Forest should allow off road vehicles.

Response: In response to user expectations and resource protection needs, the 2002 Forest Plan establishes a forest-wide Standard (Chapter 2 – *Administrative*) that restricts all motorized and mechanized travel to designated routes during snow free periods. Therefore, the 2002 Forest Plan provides for OHV, ATV, motorcycle, and 4-wheel drive use on designated routes. This travel system can be maintained to minimize environmental damage from these uses while providing a variety of recreational experiences.

For more information supporting the decision to limit vehicle use to roads and trails please refer to FEIS Volume 2, Chapter 3, Topic 2 – *Travel Management, Resource Mitigation*.

TM66 Public Concern: The White River National Forest should fully evaluate potential negative economic impacts from closing roads and trails.

Response: The Travel Management Plan will be initiated upon approval of the 2002 Forest Plan. The Travel Management Plan will contain specific information regarding road management, including road and trail closures. We intend to develop an Environmental Impact Statement to analyze the effects of travel management alternatives as part of the Travel Management Plan. Such an EIS would include an economic impact analysis. Moreover, there will be public involvement and comment opportunities on this analysis.

TM67 Public Concern: The White River National Forest should conduct a full NEPA analysis on the impact of off-road travel by motorized vehicles.

Response: For a discussion of the rationale for the decision to restrict motorized vehicles to roads and trails see FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Resource Protection.* Scientific studies currently available, public response to this plan, current trends and directions, current practices, and authoritative consensus led to the selected Alternative which restricts snow-free motorized and

mechanized travel to designated routes. Alternatives were presented in this NEPA process that allowed or did not allow off-road travel. For a discussion of how motorized use pertains to roadless areas and eligibility for recommended wilderness see FEIS Volume 2, Chapter 3, Topic 4 – *Roadless Area Management and Recommended Wilderness*, and FEIS Volume 4, Appendix C – *Roadless Areas.*

TM68 Public Concern: The White River National Forest should concentrate use to minimize the effects of recreational activities.

Response: The staff of the White River National Forest conducted extensive planning for all types of recreation that occur on the White River National Forest. Some uses are best served in a concentrated area while others require more areas and separation. Some recreationalists prefer an isolated experience, while others like to be around others in a group. The Forest Service tries to accommodate both. Impacts from recreation would have to be examined before saying which would be better, to spread the use out or concentrate it and highly impact one area. Also different uses are condusive to concentrations such as downhill skiing, while others such as hiking may be best spread out.

TM69 Public Concern: The White River National Forest should enforce the regulations already in place.

Response: The Forest Service enforces existing laws and regulations through law enforcement officials and forest personnel. Travel management decisions, similar to all other decisions made in the Forest Plan, are based on a variety of factors, including public use and expectations, resource protection, species habitat, and compliance with applicable directions, not to punish many for the abuses of a few.

The White River National Forest will continue working to prevent violations through partnerships with user groups, providing education materials and signs to the public, as well as through law enforcement activities.

TM70 Public Concern: The White River National Forest should periodically reevaluate closures.

Response: The staff of the White River National Forest currently evaluates closures on a continual basis to ensure both compliance with the closure and that reasons for the closure remain valid. Some closures require more frequent evaluations than others. Evaluations are based on the reasons for the closure (ie. range, wildlife, vegetation, slope stability, etc).

TM71 Public Concern: The White River National Forest should require easily visible OHV user ID tags.

Response: Registration of vehicles is a requirement of the State of Colorado, not the Forest Service.

TM72 Public Concern: White River National Forest monitoring and enforcement safeguards should be in place to prevent the spread of weeds before OHV use is permitted.

Response: We currently have a weed program that monitors, treats, and regulates the spread of noxious weeds on the White River National Forest. See FEIS Volume 2, Chapter 3, Topic 1, Part 3 – *Noxious Weeds.*

TM73 Public Concern: The White River National Forest should consider alternative methods of law enforcement.

Response: Laws, penalties, and enforcement methods are based on federal laws and policies adopted at a national level. In addition, we try to educate the public as to the laws and regulations on National Forest System lands, work cooperatively with recreation groups and clubs to educate and have the members help spread the word, and provide appropriate materials such as brochures and literature, on use areas.

TM74 Public Concern: The White River National Forest should prevent road closures mandated by other agencies.

Response: Federal agencies may request road closures and comment on Forest Service proposals. Other federal agencies cannot, however, mandate road closures on NFS lands.

TM75 Public Concern: The White River National Forest should not close the Maroon Bells trails.

Response: The Maroon Bells trails will remain open in the selected alternative. See the management area map of Alternative K (2002 Forest Plan, Chapter 3 – *Management Area Direction*) for the management areas in the Maroon Bells Wilderness.

TM76 Public Concern: The White River National Forest should eliminate all wheeled vehicles from trails.

Response: Wheeled vehicles are and will continue to be allowed on trails specified for the particular type of use such as ATV, bicycle, and motorcycle. The Forest Service provides for many types of recreation. These trails are designed and to be maintained for these uses. It allows for these types of experiences for these types of recreation. Please see FEIS Volume 2, Chapter 3, Topic 3 – *Recreation Management,* for more information.

TM77 Public Concern: The White River National Forest should rotate open and closed areas.

Response: It would be difficult logistically to rotate open and closed areas annually or daily. This would require changing signs, educating people, new maps and heavy law enforcement.

TM78 Public Concern: The White River National Forest should not restrict motorized travel during hunting season.

Response: National Forest restrictions on travel are designed to protect National Forest System resources. Please see FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, *Resource Protection*, for more information. Protected resources include many elements such as soil, water, air, and wildlife.

TM79 Public Concern: The White River National Forest should restrict motorized travel during hunting season.

Response: By restricting vehicles to designated routes, and in some areas having seasonal restrictions coupled with improved hardening of roads and drainage, the White River National Forest hopes to reduce and in some cases eliminate the resource damage that has occurred in the past. See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, *Resource Protection*, for more information.

TM80 Public Concern: The White River National Forest should develop a comprehensive motorized vehicle management plan.

Response: The Travel Management Plan included in the Draft Forest Plan has been separated from the 2002 Forest Plan as a result of public comment requesting that the two process be separated. Please see FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, *Abstract*, for more information. A new Travel Management Plan, therefore, will be initiated upon approval of the 2002 Forest Plan. The Travel Management Plan will analyze management options for all roads, trails, and vehicle use on the White River National Forest. The comments received on the travel management issue during the comment period on the Draft Forest Plan will be forwarded to the Travel Management Plan ID team and considered accordingly.

TM81 Public Concern: The White River National Forest should develop a trail network for motorcycles.

Response: We recognize the need for single-track opportunities. Currently, we do provide roads and trails for motorcycles and mountain bikes; nevertheless, these roads and trails are used for other types of recreation. The system currently in place is hierarchical in order to maximize use. Numbers and amount of use is going to increase over time. To provide trails for a single use may or may not be practical. This will have to be examined in the future as use increases.

Consideration of single-track trails will be part of the analysis done for the Travel Management Plan. When the Travel Management Plan is drafted, single-track trails will be considered in accordance with the direction in the 2002 Forest Plan. There will be public comment and involvement opportunities to review the Travel Management Plan, including how the issue of single-track trails is addressed. Single-track systems, like other management activities, will have to meet all other applicable direction in the 2002 Forest Plan.

TM82 Public Concern: The White River National Forest should consider the environmental impacts of motorized travel restrictions on the Gunnison National Forest.

Response: When developing the alternative prescription maps we did examine how the neighboring forests manage their land. When the Travel Management Plan is initiated, individual roads that cross from one forest to another, or to other federal lands, will be examined.

TM83 Public Concern: The White River National Forest should emphasize retention of high maintenance routes over high-clearance four wheel drive routes.

Response: Decisions on which roads to decommission are based on many factors—use, need, cost, and duplication, to name a few. It is likely that more of the lower standard, closed or unused routes, or unclassified routes will be the priority for closure.

Passenger routes (collector and arterial routes) provide access to key areas in the forest. It is unlikely these would be targeted for closure. The FEIS states: "These roads (ML 3-5) will continue to be managed for public access with passenger cars. Any future changes to the existing system would only occur through the issuance of a subsequent decision document." (FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*)

TM84 Public Concern: The FLRMP should clarify that the "closed unless posted open" policy does not apply to foot and horse travel.

Response: There is no forest-wide restriction on foot and horse travel. Foot and horse travel is allowed forest-wide on and off trails with very few site-specific restrictions for wildlife or administrative reasons.

TM85 Public Concern: The White River National Forest should keep short spur roads open for hunting access.

Response: Evaluations of short spur roads will be made as part of the Travel Management Plan, to be initiated upon approval of the 2002 Forest Plan. Some of these small spurs may remain open and become part of the transportation system, others may be closed depending upon the site-specific conditions of the road and resulting analysis.

Winter Motorized Access

TM86 Public Concern: The White River National Forest should keep specific areas open to winter motorized travel.

Response: Both the 2002 Forest Plan and Final EIS designate, through management area prescriptions and Recreation Opportunity Spectrum (ROS) classifications, the areas that are subject to open or restricted winter motorized travel. Other factors will be examined, such as lynx habitat, topology, and so forth in the Travel Management Plan. Certain areas will then be designated open to motorized travel. There will be opportunity for public comment on specific areas of concern during the travel management plan process. All comments on specific areas during the 2002 Forest Plan process will be carried forward.

TM87 Public Concern: Snowmobile access should be restricted in the proposed Forest Plan Amendment.

Response: Both the 2002 Forest Plan and FEIS designate, through management area prescriptions and Recreation Opportunity Spectrum (ROS) classifications, the areas that are subject to open or restricted winter motorized travel. Other factors will be examined, such as lynx habitat, topology, and so forth in the Travel Management Plan. Certain areas will then be designated open to motorized travel. There will be opportunity for public comment on specific areas of concern during the travel management plan process. All comments on specific areas during the 2002 Forest Plan process will be carried forward.

TM88 Public Concern: The Forest Service should provide evidence that snowmobiling interferes with forest carnivore management before restricting access.

Response: Many studies have been conducted to come to the conclusions presented in the 2002 Forest Plan and FEIS. See FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 3 – *Species Level Assessment* for further information. Also there are references available through the wildlife biology department on the White River National Forest.

TM89 Public Concern: The White River National Forest should clarify "limited winter motorized" in the 5.42 management prescriptions.

Response: Under the 5.42 prescription "over the snow vehicles use is restricted to designated routes". (2002 Forest Plan, Chapter 3 – *Management Area Direction*, 5.42). In areas designated 5.42 (Bighorn sheep habitat), motorized winter travel will only be allowed on on designated routes. These routes will be defined in the Travel Management Plan, winter travel portion.

TM90 Public Concern: The White River National Forest should allow winter motorized travel.

Response: The 2002 Forest Plan land allocation prescriptions designate areas for winter motorized use as well as winter non-motorized use. This is intended to give all winter users places to recreate on the Forest. Winter motorized travel opportunities will be analyzed in more detail through the Travel Management Plan—to be initiated upon approval of the 2002 Forest Plan. The 2002 Forest Plan, however, sets the stage for winter motorized and non-motorized opportunities. Please refer to FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, for more information.

TM91 Public Concern: The White River National Forest should restrict snowmobile use in management area 8.25 and adjacent to wilderness.

Response: Snowmobile use is not allowed for general public use within ski area special use permit allocations. The reason is for public safety. Snowmobile use is allowed in some areas adjacent to wilderness and not others. Allocations are based on factors such as terrain, traditional use, habitat interaction, ecological factors, and with thought to providing a variety of snowmobile recreation opportunities to the public.

TM92 Public Concern: The White River National Forest should concentrate snowmobile use.

Response: The Forest Service has determined that it is appropriate to concentrate snowmobile use in some areas while allowing open snowmobile travel in other areas. The 2002 Forest Plan (Chapter 3 – *Management Area Direction*) sets the stage for winter recreation through management area allocation and direction. Further analysis can be found in the FEIS Volume 2, Chapter 3, Topic 3 – *Recreation Management* and Topic 2 – *Travel Management and Infrastructure*. Allocations are based on factors such as terrain, traditional use, habitat interaction, ecological factors, and with thought to providing a variety of snowmobile recreation opportunities to the public. There will be areas of winter motorized use and areas of winter non-motorized use designated through management prescription allocations, Recration Opportunity Spectrum (ROS) classifications, and the subsequent Travel Management Plan.

TM93 Public Concern: The White River National Forest should ban all winter motorized travel except emergency vehicles.

Response: Snowmobile use, along with many other recreational uses, is and will continue to be an allowed form of recreation on the White River National Forest. The White River National Forest provides many types of recreational opportunities, one of them being snowmobile use. There will be areas of winter motorized use and areas of winter non-motorized use designated through management prescription allocations, Recration Opportunity Spectrum (ROS) classifications, and the subsequent Travel Management Plan. This will allow a person to experience motorized or non-motorized recreation in winter and in so doing serve the majority of the public.

TM94 Public Concern: Forestwide infrastructure Standard #3 should state that snowmobile use is prohibited unless specifically allowed.

Response: The standard reads, "Motor vehicles designated for over-snow use are permitted:" and lists the areas it is allowed. (2002 Forest Plan, Chapter 2, Standard 3). The standard also makes it clearer to the public where the White River National Forest is allowing this use. Do do the opposite would be difficult to clarify. In the travel management plan there will be areas and routes designated for winter motorized travel.

TM95 Public Concern: The White River National Forest should restrict off-road travel by snow depth.

Response: The 2002 Forest Plan does not establish restrictions to snowmobile use based on snow depth. The Forest Service has determined, due to the varying site-specific conditions and snowfall patterns on the White River National Forest, that such restrictions would not be practical.

TM96 Public Concern: The White River National Forest should establish speed limits for snowmobiles.

Response: This is not the type of decision made in the Forest Plan, however it could be considered for individual areas or site-specific conditions at a later time. This decision would have to involve the Ranger District(s), road management, legal enforcers, and the public. A compelling need, study, and implementation would have to be conducted.

Non-Motorized Access

TM97 Public Concern: White River National Forest trails that parallel highways should be kept open to bicycles.

Response: Where it is possible, the Forest Service seeks to maintain bicycle access on trails that parallel highways. However, legal restrictions sometimes supersede Forest Service jurisdiction in these matters. These restrictions include private property rights, Wilderness statutes, competing public right-of-ways, and the potential for adverse environmental impacts.

TM98 Public Concern: The White River National Forest should restrict mountain bikes. – and –

TM99 Public Concern: The White River National Forest should restrict mountain bikes to specific areas. – and –

TM100 The White River National Forest should restrict mountain bikes to roads.

Response: Mountain bikes are a popular recreational use and will continue to be allowed on National Forest System lands. The 2002 Forest Plan (Chapter 2 – *Administrative*) restricts all mechanized travel to designated routes during snow free periods. Thus, mountain bike use will be on the roads and trails of the forest for which this activity is allowed. This also allows for the maintenance of roads and trails due to impacts from mountain biking and other uses.

The Travel Management Plan, to be initiated upon approval of the 2002 Forest Plan, will establish specific decisions regarding where mountain bike will be allowed and how they will be managed within those routes.

TM101 Public Concern: The White River National Forest should close bike trails where wilderness violations are occurring.

Response: Mountain bike use is not allowed in designated wilderness. In its attempts to prevent wilderness violations, the Forest Service provides law enforcement, promotes public education/awareness, and supports cooperative efforts among user groups. However, some wilderness violations will continue to occur as long as individuals chose not to observe the rules and regulations. Closing trails and roads in close proximity to wilderness areas will not prevent violations from occurring.

***TM102 Public Concern: The White River National Forest should allow mountain bikes in wilderness areas*.**

Response: In compliance with the Wilderness Act and Forest Service policy, mountain bike use is not allowed in wilderness areas within the White River National Forest. The Forest Service does not have the authority to change the provisions of the Wilderness Act; nor does it intend to change the existing implementation policy.

TM103 Public Concern: Bicycle travel should be allowed in core areas (MA 1.41).

Response: The Forest Service has determined that the desired future condition for this management area is not compatible with mountain bike use. From the 2002 Forest Plan, Chapter 3, 1.41 Mangement Area description, "They [these areas] generally contain little to no evidence of human development. These are natural-appearing areas which biological process and ecosystems funtion with little or no human influence." To allow mountain bikes would be in contrast to this prescription.

TM104 Public Concern: Best management practices should be used on the White River National Forest to minimize impacts of horses.

Response: The White River National Forest designs and maintains trails for horse use in a manner intended to minimize impacts.

TM105 Public Concern: The White River National Forest should develop management categories addressing an intermix with winter non-motorized.

Response: The Intermix designation allows for winter motorized uses. However, individual Intermix areas can be designated non-motorized use. The Travel Management Plan will address individual areas for winter motorized and non-motorized use. Public involvement and opportunities to comment will be part of the decision-making process for the Travel Management Plan.

Section 2—National Forest System Roads and Forest Highways

General

TM106 Public Concern: Roads built for extractive uses should remain open for public use.

Response: Some roads built for temporary needs are retained for recreational use. The Forest Service examines several elements when considering the maintenance of such temporary roads. These elements include: future access needs; alignment of the road within the overall transportation system; the agency's ability to effectively maintain the road; and the resource management emphasis designation of the area surrounding the route. The Forest Service does not designate roads for unmaintained use. It would be irresponsible for the Forest Service to not maintain the road system on the Forest. Maintenance is necessary for safety and environmental protection. When a road is constructed for a single purpose (such as logging) and a compelling need no longer exists, it is the Forest Service's responsibility to either close or obliterate the road.

TM107 Public Concern: The White River National Forest should post signs in specific areas.

Response: Each Forest Service ranger district posts access signs. Sign location is not a decision made in forest planning. Concerns about signing should be taken to local ranger district offices.

TM108 Public Concern: The White River National Forest should use signs to minimize impact.

Response: We post many educational signs and bulletins at key locations throughout the White River National Forest. We would like to increase this effort as funding becomes available.

TM109 Public Concern: The White River National Forest should replace all Arapaho National Forest signs and correct inadequate signs on the Dillon Ranger District.

Response: The Dillon Ranger District is making an effort to correct signs as funding and resources become available.

Road Density

TM110 Public Concern: The FEIS should clarify road density information depicted in Figures 10 and 11 of the DEIS summary by alternative.

Response: Figure 10 (DEIS Summary, page 33) depicts the number of acres where off-road and off-trail travel by motorized and mechanized vehicles is allowed. Figure 11 depicts miles of roads and trails.

TM111 Public Concern: The White River National Forest should apply road density standards forest wide.

Response: There is no forestwide road density standard in the 2002 Forest Plan. There is, however, road density direction in management areas 5.43 (Elk habitat), 5.4 (Forested flora and fauna habitats), and 5.5 (Forested landscape linkages). For these management areas, it was determined that road density direction was necessary to meet the habitat needs and the desired future condition for that area. This was not found to be necessary for the rest of the forest.

Management area 5.5 is designed to manage areas for large carnivores and other species requiring forested areas. There is road density direction in this management area that says open road densities will not increase. See 2002 Forest Plan, Chapter 3 – *Management Area Direction*, 5.5, for more information. In addition, there are specific lynx habitat management directions found in the 2002 Forest Plan, Chapter 2 – *Biological, Canada Lynx.* It includes direction on road uses and snow compaction.

All management areas address travel management. Some of this information is found in the management area description or desired future condition, and some of this information is found in the standards and guidelines—usually the "infrastructure" heading. If there are no standards or guidelines restricting or prohibiting certain road or trail use or development, those activities are generally allowed—in compliance with the forestwide direction in Chapter 2 of the 2002 Forest Plan.

TM112 Public Concern: Travel Management Plan motorized road density provisions should be enforceable standards, not guidelines.

Response: The reason why road density is a guideline is because this a goal-designed to achieve desired condition, which is how guidelines are defined. However, the use of guidelines to provide direction for road density management does not diminish the importance of this concern nor does it interfere with our ability to enforce management decisions.

TM113 Public Concern: The White River National Forest should develop a timeline for establishing and complying with road density standards.

Response: Implementation of road density standards will stem from the implementation of projects that allow for construction and obliteration of roads. Projects can be initiated in a variety of ways that would help in obtaining road density goals, however it is difficult to assume a timeline or predict all projects that may be initiated.

Construction, Maintenance, and Obliteration

TM114 Public Concern: The White River National Forest should prioritize construction and maintenance based on protecting environmentally sensitive areas.

Response: Many factors go into prioritizing road construction and maintenance. These include budget, amount of use, and definitely environmental factors such as drainage improvements, dust abatement, road relocation, etc. See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*.

TM115 Public Concern: The White River National Forest should adopt the road obliteration and maintenance standards of the Watershed Conservation Practices Handbook.

Response: All Watershed Conservation Practice (WCP) standards are included in the 2002 Forest Plan, Chapter 2 – *Forestwide Standards and Guidelines*. Standards will be met during project implementation activities. All road construction, maintenance, reconstruction, and obliteration, therefore will be in compliance with the Watershed Conservation Practices Handbook (FSH 2509.25).

TM116 Public Concern: The Final Travel Management Plan should provide an outcome and activity measure for Objective 3.1d. – and –

TM117 Public Concern: The Final Travel Management Plan should provide an objective for the road construction outcome measure.

Response: Objective 3d.1 in the 2002 Draft Plan is Strategy 4a.4 in the 2002 Forest Plan (see 2002 Forest Plan, Chapter 1, Goal 4). It addresses maintenance of buildings, bridges and facilities to standard. This objective states, "by five years from plan approval, 20% of buildings, bridges and other facilities is maintained to standard." Monitoring will be done to measure progress towards that goal.

Also, district personnel monitor the condition of their roads and communicate to the road maintenance personnel high priority needs. Several strategies to meet infrastructure goals are outlined in 2002 Forest Plan, Chapter 1, Goal 4, Objective 4a. How much is accomplished is dependent on budget allocations for these purposes.

New road construction is based on project level needs. There is not a Forestwide objective to build road miles. Any new road construction must be proposed and analyzed through the NEPA process. As for road reconstruction, deferred maintenance surveys were completed on all maintenance levels 3-5 and are being conducted on a sampling of maintenance levels 1 and 2. See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, Affected Environment, for a discussion of level 1, 2, and 3 routes and maintenance issues. The Travel Management Plan has been separated from the 2002 Forest Plan and will begin upon approval of the 2002 Forest Plan. Many of these issues will be described in more detail in the Travel Management Plan.

TM118 Public Concern: The White River National Forest should limit new high altitude road construction.

Response: The 2002 Forest Plan contains direction on activities planned in alpine areas (Chapter 2 – *Biological, Alpine*). This direction applies to road construction or reconstruction activities as well as any other activities in alpine areas. The guidelines in this section state "1. Prohibit new roads, trails, and livestock driveways in alpine areas except as needed to reduce resource impacts. 2. Minimize soil excavation and disturbance due to new construction in alpine areas by locating structures on flat or nearly flat sites and minimizing size of structures."

TM119 Public Concern: The Forest Service should build roads for recreation and forest health reasons only.

Response: New road construction on the forest is done with purpose, thought, and consideration to environmental impacts. The White River National Forest is a multi-resource facility where access is needed to accomplish goals, uses, and needs at hand. Through the NEPA process all proposals for new roads are carefully examined.

TM120 Public Concern: The White River National Forest should design roads to minimize environmental damage.

Response: The use of existing road location and design standards (Watershed Conservation Practices Handbook, Forest Manuals and Handbooks), coupled with utilization of the latest engineering technologies, conducted within the framework for site-specific NEPA analyses, will provide the Forest Service with protocols for minimizing environmental damage caused by road construction.

Before any new road construction is initiated, engineers, specialists, and Forest Service staff use the latest photography, on the ground surveying to identify the best location for a road in terms of practicality and environmental impacts.

TM121 Public Concern: The White River National Forest should include the long-term costs of road restoration in its economic analysis.

Response: Budget allocations for road maintenance are to be spent for that purpose only. Roads to be reconstructed are allocated from project allocations, and can be from other sources such as watershed restoration allocations. Budget allocations for watershed restoration must be spent on watershed restoration activities. The magnitude and allocation of these funds are not decisions made in forest plans. Congress allocates funds on an annual basis.

TM122 Public Concern: The White River National Forest should separate outcome and activity measures for level 3-5 road maintenance miles.

Response: It is very common for the Forest Service to refer to maintenance levels 3-5 as a group. These roads all serve the same purpose in that they are arterials and collectors. The most developed generally have aggregate surfacing (a few are asphalt), and are designed for passenger vehicle travel. Maintenance level is one of many ways to group and examine the road system. Groupings 3-5 make sense for many analyses. See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, National Forest System Roads*, for a more complete discussion of level 3-5 roads.

TM123 Public Concern: The FEIS should address the costs associated with the backlog of trail and rehabilitation efforts.

Response: Budget allocations for trail maintenance are not decisions made in the forest planning process. Congress allocates funding. The Forest Service has conducted maintenance surveys for the conditions and needs required to rehabilitate and maintain the trails and is aware of the backlog and needs required. Reports on the condition of the trails and the backlog of maintenance were given to Congress.

TM124 Public Concern: The Forest Service should allocate sufficient funds for road maintenance on the White River National Forest.

Response: Budget allocations for road maintenance are not decisions made in the forest planning process. Congress allocates funding. The Forest Service has conducted maintenance surveys for the conditions and needs required to rehabilitate and maintain the roads and is aware of the backlog and needs required. Reports on the condition of the roads and the backlog of maintenance were given to Congress.

TM125 Public Concern: The White River National Forest should not transfer jurisdiction of Forest Development Roads to local governments to reduce maintenance costs.

Response: The 2002 Forest Plan decision does not transfer jurisdiction of Forest Developemt Roads to any local governments. The White River National Forest looks at many factors prior to any transfer of jurisdiction for a road, not just road maintenance. It is not common practice to transfer jurisdiction. In some cases it may be more of a benefit to everyone if a road is under another agencies jurisdiction. In other cases it may behoove all to have the Forest Service keep jurisdiction, but have another agency responsible for the maintenance. The Forest Service and local governments have a good working relationship and are very conscientious to environmental impacts from a road.

TM126 Public Concern: The White River National Forest should maintain roads to control erosion.

Response: Methods to control erosion are among the main factors examined for road maintenance. See 2002 Forest Plan Chapter 2 – *Physical,* for direction on management activities that impact resources such as soil and water.

TM127 Public Concern: The White River National Forest should present road maintenance cost figures in dollars per mile for 10-year periods.

Response: Funding to address maintenance costs is allocated and determined annually through the Congressional budget process. The budget process is not part of a forest plan analysis. For further information, contact the Forest Engineer at the White River National Forest Supervisor's Office.

TM128 Public Concern: The FEIS should require obliteration of roads within two years of initial construction.

Response: For some management projects temporary roads are the best method. For others it may be of best interest to keep the road for future entry, recreation use, or other needs. If a road is deemed temporary, the site-specific NEPA document (or other authorization document) will designate when the road shall be obliterated. The Forest Service cannot state that a road will be closed with in 2 years of initial construction

because many projects (such as timber sales, mineral extraction, and research) take longer than 2 years. However, if a road is deemed temporary it should be obliterated at the end of the project.

TM129 Public Concern: The White River National Forest should close roads in proposed wilderness areas.

Response: Proposed wilderness areas are areas that were found to be roadless through the roadless area inventory process. See FEIS Volume 2, Chapter 3, Topic 4 – *Roadless Area Management and Recommended Wilderness*, for more information on the roadless area inventory. There may be some roads in these areas that are currently used as motorized or non-motorized trails. If an area is proposed for wilderness designation, roads will be converted to non-motorized trails or obliterated, trail use will be made non-motorized. See the Record of Decision for the 2002 Forest Plan for specific details.

TM130 Public Concern: The White River National Forest should set road obliteration goals on a site by site rather than an annual mileage basis.

Response: The Travel Management Plan has been separated from the 2002 Forest Plan and will be initiated upon approval of the 2002 Forest Plan. The Travel Management Plan will look at site-specific opportunities for road closure and decommissioning activities. Site-specific analysis must be performed before any road obliteration or decommissioning activities take place. The annual estimate made in the 2002 Forest Plan is a reflection of possible accomplishment based on experienced budget levels. It is provided in the 2002 Forest Plan to give a general estimate of what might be expected. The site-specific analysis is still required, however.

TM131 Public Concern: The White River National Forest should enter road maintenance partnerships with state, county, and private organizations.

Response: We currently participate with volunteers and counties in helping to maintain roads and trails. The Forest Service encourages any group or industry to partner with or support efforts to maintain roads and trails. Those who may be interested should contact the White River National Forest Supervisor's Office in Glenwood Springs.

TM132 Public Concern: The White River National Forest should assess road maintenance fees from state hunting licenses.

Response: Hunting license fees are funds that go directly to the State of Colorado. It is a State sponsored program. The funds are by law designated for the Colorado Division of Wildlife; hence, it is not appropriate or legal for the Forest Service to claim any of these funds.

TM133 Public Concern: The FEIS should address the anticipated impacts of development of aggregate sources to maintain the proposed travel management system and protect against impacts from mineral aggregate mining.

Response: The FEIS addresses the need for aggregate development. Impacts are hard to generalize as each pit or aggregate development site is unique. Some sites may have little to no impacts while others may have more impacts. Prior to development, each site is examined through the NEPA process to fully analyze any impacts. Any aggregate

development activities will have to comply with all applicable direction in the 2002 Forest Plan.

TM134 Public Concern: The White River National Forest should spend money on road maintenance rather than building new roads.

Response: This concern is address in the FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Mangement and Infrastructure*, *National Forest System Roads* and *Environmental Consequences*. "Reconstruction, maintenance, and decommissioning of existing facilities are emphasized in all alternatives. Projections for new construction are much lower than was predicted in the previous planning period."

TM135 Public Concern: The White River National Forest should design forest road obliteration projects that provide civilian job opportunities.

Response: Road obliteration projects can be accomplished through the White River National Forest road crew (which a person can apply for) and through contracts available to private companies for bid. The White River National Forest uses both methods to accomplish these projects. Federal contracting direction currently exists. Changing these processes is not a decision made in the forest planning process.

TM136 Public Concern: The White River National Forest should increase road mileage obliteration goals. – and –

TM137 Public Concern: The White River National Forest should not obliterate more roads.

Response: The mileage for road obliteration estimated in the 2002 Forest Plan (Chapter 1, Goals) is an approximation based on funding and accomplishment necessary to meet resource protection goals on the White River National Forest. Before any roads are obliterated, site-specific analysis must be done to identify both the individual roads and road segments for obliteration as well as the appropriate obliteration process. The Travel Management Plan will further refine road obliteration objectives by identifying specific roads, obliteration methods, and environmental consequences.

TM138 Public Concern: The Travel Management Plan should emphasize complete obliteration of roads as the most environmentally sound and cost effective road closure method.

Response: The FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, describes methods of obliteration. The method used is determined by the type of terrain, ability of the terrain to rehabilitate, and cost effectiveness.

TM139 Public Concern: The White River National Forest should close roads that lack adequate maintenance funds.

Response: Lack of maintenance funds is one factor examined in the need to close roads. Other considerations include recreational use, access requirements, and environmental impact. In some cases, other alternatives to address lack of funds for maintenance may be utilized such as closure, cooperative funding, and conversion to trails. These issues will be examined in the Travel Management Plan.

TM140 Public Concern: The FEIS should specify which types of roads are scheduled for closure.

Response: Each road closure is for specific reasons. It may be resource protection, lack of funding for maintenance, or single purpose use such as timber, range, mineral access or private land access. The reasons are disclosed in Road Management Objectives (RMO). RMOs are created for each road and are available through engineering department at the White River National Forest Supervior's Office. For roads that are decommissioned and obliterated disclosure will be through the NEPA process. Unclassified roads or "ways" may be obliterated without notice as they are not official or classified roads and obliteration is returning the ground to the condition it was intended to be.

TM141 Public Concern: The White River National Forest should include a schedule of road closures in the implementation plan.

Response: Because implementation is primarily dependent on budgets, creating an implementation schedule would be at best a guess. As budgets are allocated, a schedule is developed, generally on an annual basis for which roads may be closed (decommissioned) that year. Additional information on road closures, including specific roads or road segments, will be a part of the Travel Management Plan and future site-specific proposals.

TM142 Public Concern: The FEIS should include consideration of alternatives to closing roads.

Response: The decision to close a road or decommission a classified road is a site-specific decision and cannot be fully anticipated at a programmatic level. The Travel Management Plan will attempt to identify some of the roads for decommissioning, but will likely not be able to include them all as future ones may be identified through time. Any classified road identified for decommissioning will be disclosed through the NEPA process. Road management alternatives will be described in the Environmental Impact Statement prepared for the Travel Management Plan.

TM143 Public Concern: The Final EIS should provide detailed information on existing substandard roads.

Response: Data for substandard roads were derived from extensive survey information, computer database information, and personnel knowledge. Reports were generated from all this information for statistical use. This data is part of the inventory that will be used in the Travel Management Plan. The data was very lengthly as it pertained to every maintenance level 3-5 road. If a person has a particular concern a query can be developed to help answer the concern. Contact the engineering department of the White River National Forest Supervisor's Office for more information.

Section 3—Trails

General

TM144 Public Concern: The Final EIS should specify reasons for trail closures.

Response: The White River National Forest currently examines alternatives prior to closing any road or trail. A road or trail is an investment, and if there is a use for it and the route can be maintained we will likely retain it. Alternative trail management options will be displayed in the Travel Management Plan. Prior to closing any trail several factors are considered including environmental protection, duplicate or redundant access, wildlife habitat impacts and others. If resource concerns can be mitigated the trail may stay open.

TM145 Public Concern: The White River national Forest should link specific trail management actions with specific habitat protection goals to enhance public stewardship.

Response: Both the 2002 Forest Plan and Final EIS will outline the allowable and restrictive actions for trail management in reguards to habitat protection. The Travel Management Plan will take this information and apply it to each trail to determine the types of uses that would be compatable with in the guidelines of habitat protection.

TM146 Public Concern: The Final EIS should clarify the number of miles of trails outside wilderness by alternative.

Response: FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure* contains information on trails. There is less specificity in the FEIS than there was in the DEIS because the Travel Management Plan has been removed from the Forest Plan. The Travel Management Plan, to be initiated upon approval of the 2002 Forest Plan, will contain specific information regarding number of trails and the management of trails. Representations of the number of trail miles by alternative were removed because the site-specific examination is being done in the Travel Management Plan, based on the selected alternative of the Forest Plan.

TM147 Public Concern: The FEIS should clearly define system and non-system trails.

Response: The definitions of system and non-system trails are found in FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, National Forest System Roads, Affected Environment.*

TM148 Public Concern: The White River National Forest should create separate trails for day hikers and backpackers.

Response: In rare instances the Forest Service will designate separate uses for indiviual trails. However, the Forest Service prefers to employ a number of mitigation techniques to help user groups share trails and minimize conflicts. All such decisions will be considered during development of the Travel Management Plan. The Travel Management Plan will be initiated upon approval of the 2002 Forest Plan.

TM149 Public Concern: The White River National Forest should develop parallel trail systems to separate types of uses.

Response: The Forest Service recognizes there are currently numerous trails on which multiple modes of travel are occurring and this sometimes causes conflict. Not all multiple use trails involve conflict—either because these multiple uses are compatible or there is a low number of user encounters. However, some trail use conflicts do exist. Site-specific examinations will be conducted for the Travel Management Plan. These examinations will recommend specific uses for each road and trail. The Travel Management Plan will also evaluate all travel routes based upon management area prescriptions, Recreation Opportunity Spectrum (ROS) classification, current site conditions, management access needs, and recreation uses. The Travel Management Plan will identify areas where it is approapriate to combine motorized and non-motorized access, as well as areas that should be restricted to non-motorized travel.

TM150 Public Concern: The White River National Forest should allow hikers to travel off trail.

Response: None of the proposed alternatives in the Forest Plan would limit foot travel to designated routes—aside from some very limited seasonal restrictions, prohibitions in administrative sites, and restrictions in wildlife areas. However, the Forest Service does not want to encourage cross-country travel that creates new travel routes or causes environmental damage. If this does occur some restrictions may be necessary.

TM151 Public Concern: The White River National Forest should account for the impacts of trail restrictions on user congestion.

Response: Additional numbers recreational users could change the Recreation Opportunity Spectrum class for any given area. However, the standards to which a road or trail is constructed and maintained is primarily a function of the kind of use. The 2002 Forest Plan proposes to bring the travel system into compliance with recommended and approved standards that will reduce damage. Additionally, site-specific trail decisions will be made in the Travel Management Plan. The 2002 Forest Plan does not prohibit additional trails from being built in the future. Decisions made in the 2002 Forest Plan, such as management area designation, will direct the type of uses that can occur on trails in individual areas. Implementation of the Plan will be monitored and will be adjusted to account for increasing uses and demands placed on trails. It is likely, however, that existing trails will have more use in the future due to increases in the numbers and types of users.

TM152 Public Concern: The White River National Forest should consider developing a system of looped trails. – and –

TM153 Public Concern: Looped trail systems on the White River National Forest should be built only after environmental review.

Response: Consideration of loop trails is part of a guideline under the forest-wide standards and guidelines for travel management (See 2002 Forest Plan, Chapter 2 – *Administrative*, *Infrastructure*). In addition, when the Travel Management Plan is drafted, looped trails will be considered in accordance with the direction in the 2002 Forest Plan. There will be public comment and involvement opportunities to review the Travel Management Plan, including how the issue of looped trails is addressed. Development of

looped trails, like other management activities, will have to meet all other applicable direction in the 2002 Forest Plan.

TM154 Public Concern: The White River National Forest should improve the current trail system.

Response: The 2002 Forest Plan recognizes that trail improvements are a priority for the White River National Forest. Accomplishments are estimated in Table S-2 (FEIS Volume 2, Chapter 2). A variety of tools will be used to meet annual trail improvement accomplishments including reconstruction, closure, rerouting, and other methods. Every year, we have many projects and teams on the ground improving the trails on the White River National Forest. We welcome any user or user group to help in this effort.

TM155 Public Concern: The White River National Forest should expand trail systems. – and –

TM156 Public Concern: The White River National Forest FEIS should result in no net change in the trail system trails.

Response: We are seeking to maintain the current trail system on the White River National Forest. As increased use demands, and time and budgets allow, construction of new trails may be possible along with the decommissioning of some existing trails. Our goal is to create an efficient system of good, well-maintained trails. All trail construction, for either motorized or non-motorized use, will meet forest-wide standards and guidelines contained in the 2002 Forest Plan.

TM157 Public Concern: The White River National Forest should develop a trail collector system at the urban interface.

Response: The Whiter River National Forest currently works with local communities and private landowners to designate access points to National Forest System lands. The Forest Service works with the public to provide information on appropriate access points to the forest. People should work with the local Ranger District for ideas on where trails may be best located and designed for access along the urban interface. The Forest Service tries to eliminate non-system trails and their associated access, as there are many issues with such trails including rights-of-way, safety, and resource protection. These are not official system trails and can not be maintained to standard, nor were they constructed through the proper process of the Forest Service which examines the need, involves the public, assesses the trail location for biological and environmental effects, and utilizes engineering designs for construction.

TM158 Public Concern: The White River National Forest should create trail systems specifically for mountain bikes.

Response: Response: We recognize the need for single-track opportunities. Currently, we do provide roads and trails for motorcycles and mountain bikes; nevertheless, these roads and trails are used for other types of recreation. The system currently in place is hierarchical in order to maximize use. Numbers and amount of use is going to increase over time. To provide trails for a single use may or may not be practical. This will have to be examined in the future as use increases.

Consideration of single-track trails will be part of the analysis done for the Travel Management Plan. When the Travel Management Plan is drafted, single-track trails will

be considered in accordance with the direction in the 2002 Forest Plan. There will be public comment and involvement opportunities to review the Travel Management Plan, including how the issue of single-track trails is addressed. Single-track systems, like other management activities, will have to meet all other applicable direction in the 2002 Forest Plan.

TM159 Public Concern: The White River National Forest should determine if mountain bikes should be allowed on roads closed to motorized vehicles.

Response: In some cases, closed roads can be used for mountain bikes, horses, or hiking. Individual decisions regarding the use of closed roads will be made in the Travel Management Plan.

TM160 Public Concern: The White River National Forest should allow multiple forms of travel on single-track trails.

Response: Trail use designation (approved use) does provide for multiple forms of travel on single-track trails. See current Travel Management plan 1984 for further information.

TM161 Public Concern: The White River National Forest should incorporate some user-created roads into system trails.

Response: A well-planned transportation system to accommodate National Forest System access and use is essential. This is done in concert with adjacent landowners and forest users so as to provide the greatest good for the greatest number over time. User created routes tend to be for individual convenience rather than for the greater good, plus, since they are not planned, they are in conflict with the laws and regulations governing the use and occupancy of National Forest System lands. FSM 7700.Each user-created road, or "way," will be examined in the upcoming Travel Management Plan and a decision on its future management will be made accordingly.

TM162 Public Concern: The White River National Forest should establish appropriate trail use levels.

Response: We will be preparing a forest-wide capacity analysis to determine appropriate use levels—both on and off trails—within a few years following the Release of the Record of Decision on the 2002 Forest Plan. Management decisions will be based partially on the results of this capacity analysis. Other factors considered may include season, type of use, trail conditions, and wildlife needs.

Construction, Maintenance, and Obliteration

TM163 Public Concern: The White River National Forest should eliminate discrepancy between desired and experienced budget levels for trail maintenance and the lack of variation for the different alternatives.

Response: There is a funding level that would best allow us to achieve the goals in the 2002 Forest Plan and a funding level that has traditionally been allocated to the White River National Forest. The two do not match and it is best to present it as such. This type of analysis was continued in the FEIS and is summarized in FEIS Volume 2, Chapter 2, Table S-3.

TM164 Public Concern: The FEIS should identify the status of trails currently in poor or critical status.

Response: Surveys being conducted on the trail system currently, annual trail work accomplishments, and monitoring will enable the White River National Forest to better identify trail status. In addition, more detailed road and trail inventory information will be available for public review when the Travel Management Plan is inititated—upon approval of the 2002 Forest Plan. The Travel Management Plan will be based in part of a detailed inventory of road and trail information. Trail condition will be one item in the inventory.

TM165 Public Concern: Objective 2.1d should be subdivided into multiple objectives. – and –

TM166 Public Concern: Objective 2.1d should state "maintain 100% of trails every 2 years."

Response: In the 2002 Forest Plan, Objective 2.1d is now Objective is 2a.5 (Chapter 1). This objective is our goal to achieve the provision of quality recreation opportunities. The budget analysis shows that each alternative will make a different amount of progress toward this goal. Any alternative will be able to improve the trail system for a combination of uses. Many trails are used for a variety of uses (hiking, horses, biking) and attempting to split out trail maintenance by use type was not deemed necessary.

TM167 Public Concern: The White River National Forest should set objectives for each system trail that specifies maintenance and design standards.

Response: The Forest Service does use maintenance and design criteria that are based on the type and volume of use. Upon approval of the 2002 Forest Plan, work will begin on the Travel Management Plan. Use for each trail shall be determined in the Travel Management Plan. These uses dictate the types of maintenance and design standards.

TM168 Public Concern: The White River National Forest should develop and implement reconstruction standards for mechanized trail.

Response: Standards are in place for mechanized trails along with standards for other uses as well (FSH 2309.18). Improvements, ideas, and new techniques continue to be developed for mechanized use and the Forest Service adopts them as they come about. Allocation of resources depends on many factors such as personnel available, and budget. Sources for maintenance can come from the Forest Service, but also can come from user groups, and permitees. Ideas are always welcome.

TM169 Public Concern: The FEIS should assess the environmental impacts of trail obliteration.

Response: User created trails will be examined individually in the Travel Management Plan. These types of routes are described in the FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Affected Environment.* It is illegal to create trails without going through the proper procedures. It is the Forest Service's responsibility to correct mistakes and recondition the land to comply with its intended allocation. Trail obliteration activities, like other land management activities, must follow the forestwide standards and guidelines found in the 2002 Forest Plan, Chapter 2 – *Administrative*.

TM170 Public Concern: The White River National Forest should not use access conflicts as justification for trail obliteration.

Response: Trail obliteration occurs for a collection of reasons. Prior to closing any trail several factors are considered including environmental protection, duplicate or redundant access, wildlife habitat impacts and others. Access conflicts can be resolved in various ways and where it occurs analysis is done to determine the best solution to the conflict. The Forest Service works with local groups too in order to resolve conflicts and is supportive of these efforts.

TM171 Public Concern: The White River National Forest should prioritize construction and maintenance of trails based on protecting environmentally sensitive areas.

Response: We use a variety of criteria to prioritize construction and maintenance of trails, including protecting environmentally sensitive areas. Please see 2002 Forest Plan, Chapter 2 – *Administrative, Infrastructure*, for further information.

TM172 Public Concern: The White River National Forest should consider installation of bridges at stream crossings.

Response: Bridges are placed as needed on trails, when funding, and opportunity for construction arises.

TM173 Public Concern: The White River National Forest should use volunteer partnerships to maintain trails.

Response: The Forest Service does utilize volunteers to accomplish specific activities such as trail maintenance. Volunteers provide numerous hours of service that help the Forest Service meet maintenance goals, and we hope to form more volunteer partnerships in the future.

TM174 Public Concern: Trail maintenance on the White River National Forest should focus maintenance on the most heavily used trails.

Response: Trail maintenance is more a function of soils, grade, and slope than it is of use. In fact most of our heaviest used trails have been hardened so that annual maintenance is reduced below average. Relocation and hardening our trail system, coupled with overall planning, will reduce maintenance costs overtime. Please see FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Trails*, for further information.

TM175 Public Concern: The White River National Forest should obliterate closed trails.

Response: Some closed trails are obliterated; some are allowed to naturally return through proper closures or barriers at trail heads and in key areas; some are retained because they may be utilized in the future. Obliteration, closure, and retention decisions are conducted through site-specific NEPA review processes.

TM176 Public Concern: The White River National Forest should consider temporary or seasonal trail closures. – and –

TM177 Public Concern: The White River National Forest should use seasonal trail closure for environmental protection.

Response: The Forest Service does utilize seasonal or temporary closures for many reasons (including minimizing wildlife impacts and environmental impacts) when warrented. Impacts are examined on a case-by-case basis and restrictions applied where necessary to address specific issues. Individual trail restrictions or closures will be analyzed in the Travel Management Plan.

TM178 Public Concern: The White River National Forest should consider all other management alternatives before closing trails.

Response: The Forest Service currently examines alternatives prior to closing any road or trail. A road or trail is an investment, and if there is a use for it and the route can be maintained we will likely retain it. Alternative trail management options will be displayed in the Travel Management Plan.

TM179 Public Concern: The White River National Forest should close trails for specific reasons.

Response: Prior to closing any trail several factors are considered including environmental protection, duplicate or redundant access, wildlife habitat impacts and others. If resource concerns can be mitigated the trail may stay open. The goal is to have an efficient trail system on the White River National Forest. Please see the 2002 Forest Plan, Chapter 2 – *Adminsitrative, Infrastructure*, for further information.

TM180 Public Concern: The White River National Forest should provide acceptable replacements for closed trails.

Response: Many factors are considered prior to a trail closure. Please see the 2002 Forest Plan, Chapter 2 – *Administrative, Infrastructure*, for further information. If the trail is needed to meet and objective, then it may be appropriate to address resource impacts through mitigation, including trail reconstruction or relocation.

TM181 Public Concern: The Final EIS should specify rationales for individual trail closures.

Response: For any closure rationale has to be disclosed. Decisions on which roads to decommission are based on many factors—use, need, cost, and duplication, environmental or wildlife impacts to name a few. Individual trail management options, including closures, will be analyzed in the Travel Management Plan. Reasons for restrictions will be a part of this analysis.

TM182 Public Concern: Appendix O should provide detailed rationale for site-specific restrictions.

Response: Appendix O is no longer part of the 2002 Forest Plan or the Final EIS. The subsequent Transportation Management Plan will provide information in a simuliar fashion, but will contain more information as it will be a stand alone EIS.

TM183 Public Concern: The White River National Forest should ensure specific trails within wilderness areas are listed as closed to mountain bikes.

Response: The Wilderness Act is clear about travel in wilderness and Forest Service regulations also are clear that mechanized travel is prohibited in Wilderness (36CFR293.6). The White River Forest Visitors map, along with signage displays the location of the Wilderness boundaries. There are many signs at trailheads, along trails and within the forest that display the wilderness boundary.

Signs

TM184 Public Concern: The White River National Forest should standardize county trail signs.

Response: County trail designation is a function of County government, and is not under the jurisdiction of the Forest Service. There are efforts however through the State of Colorado to standardize recreation and other signs.

TM185 Public Concern: The White River National Forest should minimize the use of National Forest boundary signs.

Response: Signs should be posted when needed to ensure the message is relayed and visually acceptable. Implementation of the 2002 Forest Plan will not require having thousands of signs posted to be implemented. Education, publications, and a few educational signboard postings in key locations will help us relay our messages.

TM186 Public Concern: White River National Forest seasonal closure signs should post effective dates.

Response: All seasonal closures are special orders, requiring posting as stated in 36 CFR 261.51. The forest does post dates on seasonal closures. Closure information is also available at each district. The Forest Service is considering several methods to improve signing on the Forest.

TM187 Public Concern: Signs at White River National Forest trailheads should clearly designate the types of use allowed.

Response: Many, if not most, White River National Forest trails are signed to designate uses allowed on each trail. Most signs are at key trailhead locations. We will continue to improve our effort to sign trails and roads on the forest.

TM188 Public Concern: The White River National Forest should remove signs directing use to specific locations.

Response: Many signs are posted to direct people to access points. It helps people find proper entry points to trailheads, campground and key access points on the White River National Forest. The Forest Service will continue this practice under the 2002 Forest Plan.

Section 4—Ways

TM189 Public Concern: The FEIS should include information on the location and concentration of user-created roads and trails.

Response: The Travel Management Plan will be initiated upon approval of the 2002 Forest Plan. The Forest Service will disclose all the user-created roads and trails it has inventoried during site-specific analyses conducted for the Travel Management Plan. User-created roads and trails will be considered off-road; thus, motorized/mechanized access to these routes will be prohibited.

TM190 Public Concern: The White River National Forest should close specific ways seasonally.

Response: See FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, *Ways*, for a discussion on ways. If a way becomes classified or designated then it may become subject to seasonal restrictions. The Forest Service does not recognize ways as official roads or trails and therefore cannot treat them as such (ie, maintain them, apply restrictions and so forth). The objective will be to eliminate ways by designation or obliteration. After the Travel Management Plan is complete all ways will be treated as unofficial roads/trails and be subject to obliteration.

TM191 Public Concern: Travelway density on the White River National Forest by habitat type and protection status should be a key indicator.

Response: The key indicators for travel management used in the DEIS were adapted for the FEIS, partially in response to this concern. See the 2002 Forest Plan (Chapter 3 – Management Areas, Management Area 5.4, 5.43, and 5.5) for specific road density direction. See also the discussion in FEIS Volume 2, Chapter 3, Topic 1, Part 2, Section 2 – *Ecosystem-level Assessment, Effects on fragmentation and perforation from travel management,* and Topic 1, Part 2, Section 3 – *Species-level assessment.*

TM192 Public Concern: The Final EIS should include information on the impacts of user-created roads and trails.

Response: The FEIS discusses, in a general manner, the existence of "ways" or unclassified roads and trails on the White River National Forest. See the FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure, Ways* for further information. Individual ways will be examined, and the future management of these ways will be determined in the Travel Management Plan, to be initiated upon approval of the 2002 Forest Plan.

TM193 Public Concern: The White River National Forest should not encourage the proliferation of user-created roads by adding ways into the travel system.

Response: The 2002 Forest Plan does not encourage the proliferation of user created roads and trails. This position is clearly stated in FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, *Ways*, *Affected Environment.* "Decisions will be made in the travel management plan to designate these routes (ways) or eliminate them. In most cases, the objective will be to eliminate the routes by obliteration, along with all subsequent routes created there after. Any new route, road, or trail that needs to be created will have to have a compelling need and go through the proper process before construction."

TM194 Public Concern: The White River National Forest should collaborate with local communities to determine which user-created ways will be included in the travel management inventory.

Response: The Travel Management Plan will be initiated upon completion of the 2002 Forest Plan. During the travel management planning process, forest staff will work with individuals and local communities on the transportation system desired and necessary for the White River National Forest. Decisions will be made from a collection of public comments, scientific analysis, and best management practices as to the future fate of user-created ways. Once Travel Management Plan is completed, all user-created ways will thereafter be decommissioned. Any new roads or trails will need to be constructed through proper procedures. Refer to FEIS Volume 2, Chapter 3, Topic 2, Part 1 – *Travel Management and Infrastructure*, *Ways*, for further information.

Part 2—Landownership

TM195 Public Concern: The White River National Forest should guarantee access to private property holders.

Response: Non-federal land inholdings within the White River National Forest are guaranteed reasonable access under the Alaska National Interest Lands Conservation Act of 1980 (ANILCA). This act requires the Secretary of Agriculture to provide access to inholdings "as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof". The Act also states that, "such owner comply with rules and regulations applicable to ingress and egress to or from the National Forest System." The 2002 Forest Plan establishes mechanisms to comply with both of these provisions.

TM196 Public Concern: The White River National Forest should assure that the objective to survey and mark 21% of the boundaries of National White River National Forest land can be achieved.

Response: The 2002 Forest Plan (Chapter 1, Goal 3) identifies an objective and measures to gauge progress towards survey and marking intentions within budget availability. The amount of available funds to work on boundary location will determine how much progress can be made towards this goal. Monitoring will show if the goal is reasonable and attainable.

TM197 Public Concern: The White River National Forest should collaborate with local jurisdictions to secure and maintain public access.

Response: The Forest Service strives to gain public access to National Forest System lands, and will continue to work with local governments and landowners to gain access in appropriate ways. While the 2002 Forest Plan recognizes that acquiring rights-of-way is important to the public, it does not affect legal rights-of-way or identify all access points. The Travel Management Plan, to be initiated upon the completion of the Forest Plan, will identify all roads, trails, and corresponding uses on the White River National Forest. Collaborative efforts with local governments will be part of this effort, including examining local development plans and local master plans regarding trail and roads issues.

TM198 Public Concern: The boundaries between the WRNF and the Routt National Forest should be corrected on the maps.

Response: The Routt National Forest boundaries are not on the maps for the 2002 Forest Plan, nor were they indicated within any Draft documents maps.

TM199 Public Concern: The White River National Forest should minimize use of National Forest boundary signs.

Response: Posting National Forest System (NFS) boundaries (a) provides for clearer on-the-ground designation of the landownership pattern in a specific area and (b) aids in differentiating federal from private and other non-federal lands. This is necessary to provide protection of these NFS lands from illegal occupancy or trespass, as well as to identify NFS lands to the public for their use and enjoyment. Posting is done to a level to adequately meet these two objectives. Often the landownership pattern is complex, especially near areas of intensive residential development. This complexity, as well as a higher risk of illegal occupancy in these areas, creates the need for a greater number of boundary signs to be posted.

TM200 Public Concern: The White River National Forest should acquire specific parcels of land.

Response: The Forest Service is authorized to provide a consolidated landownership base suitable to meet management needs through land exchange, land purchase, land transfers and donations. The Forest Service acquires lands at appraised market values. Funds to acquire land are allocated by Congress and have been limited by budget allocations for land acquisitions. Other opportunities to acquire land would be through land exchange. Exchanges occur on an equal monetary basis when an analysis and determination has been done that indicates the exchange is in the public interest. Acquisition of specific parcels is not a decision made in forest plans. These decisions are made on a case-by-case basis through the NEPA process. However, planning direction for land adjustments and conveyances is found in the 2002 Forest Plan, Chapter 2 – *Administrative*, *Real Estate*.

TM201 Public Concern: The Forest Service should be restricted in trading Forest lands.

Response: National Forests have very limited authority to sell land. Most land adjustments are accomplished through exchanges. Congress has authorized the Forest Service to exchange lands when the public interest will be benefited. Congress also funds the Forest Service each year to accomplish land exchanges. Therefore, restricting the Forest Service from trading lands would be contrary to Congressional intent, and, hence, outside the scope of Forest Plan decisions.

TM202 Public Concern: The White River National Forest should assure continued public access when lands are traded.

Response: One of the priority considerations in land exchanges is continued or new public access to National Forest System lands. All land exchanges go through a public scoping phase to assure issues associated with the exchange are identified. The process is designed to identify all issues, including public access where applicable, and provide for case-specific analysis and determinations.

TM203 Public Concern: The Forest Plan should include a requirement that LOAAs be adopted and amended using a community involvement process. – and –

TM204 Public Concern: The White River National Forest should collaborate with other jurisdictions to purchase open space.

Response: Land Ownership Adjustment Analysis (LOAA) processes currently involve members of the public and local governments. This policy will continue. The commitment of the Forest to work cooperatively with interested parties on planning activities and intergovernmental projects is found in the 2002 Forest Plan, Chapter 1, Goal 5b, *Public Collaboration*.

TM205 Public Concern: The FEIS should provide procedures to monitor the activity and outcome measures described in Goal 3.2.

Response: Goal 3.2 in the Draft Forest Plan is Strategy 4b.1 in the 2002 Forest Plan (Chapter 1, *Introduction*). This section was updated in the 2002 Forest Plan to reflect new information and national direction. Strategy 4b.1 discusses opportunities to convey, purchase, or exchange lands where needed. Accomplishments will be tracked as a part of Forest Plan monitoring. The monitoring strategy is found in Chapter 4 of the 2002 Forest Plan.

TM206 Public Concern: The White River National Forest should not convey lands to ski areas or outfitter guides.

Response: Most land adjustments are accomplished through exchanges. Congress has authorized the Forest Service to exchange lands when the public interests will be benefited. Policy direction for land ownership adjustments exists extensively in the Forest Service Manual at 5400. Each individual land adjustment will require the appropriate environmental analysis that will disclose public benefits and environmental issues. Site-specific decisions are not made through the forest planning processs.

TM207 Public Concern: The White River National Forest should continue to make RS 2477 determinations only as claims are formally presented. – and –

TM208 Public Concern: RS 2477 claimants should be required to prove all three elements of the grant provisions for access. – and –

TM209 Public Concern: The White River National Forest should reject NEPA violation claims based on potential RS 2477 grant requests.

Response: RS 2477 determinations are not made in the Forest Plan. The 2002 Forest Plan, however, recognizes that there are valid outstanding rights (see the Preface of the 2002 Forest Plan and FEIS Volume 2, Chapter 3, Topic 2, Part 3 – *Special Use Authorizations, Legal and Administrative Framework*). The Forest Service will consider and recognize these rights when presented with the appropriate documentation. Adjustments can be made to the 2002 Forest Plan in the future if valid RS 2477 claims necessitate such action.

TM210 Public Concern: The White River National Forest should require conservation easements for the protection of forest resources as a condition of conveyance of public land to private ownership. – and –

TM211 Public Concern: The White River National Forest should not exchange land that will be used for homes in and around the Forest. – and –

TM212 Public Concern: Land exchanges for affordable employee housing in ski resort areas should not be allowed.

Response: Land exchanges occur on an equal monetary value basis when they are in the public interest. A public interest determination is made after a public involvement process and completion of an environmental analysis that is case or site-specific. The above concerns are addressed in the individual case processing of each proposed land exchange (where applicable) and are not decisions made at the forest plan level. The Forest Service policy on land ownership adjustments is found in the Forest Service Manual at 5400. Additional information is also found in the 2002 Forest Plan, Chapter 2 – *Administrative, Real Estate*.

TM213 Public Concern: The White River National Forest should retain ownership of parcels of high ecosystem value, such as the area of Cucumber Gulch outside Breckenridge.

Response: Direction for land adjustment activities is found in the 2002 Forest Plan, Chapter 2 – *Administrative, Real Estate*. These standards and guidelines provide direction for resources to consider and priorities for land adjustment activities.

TM214 Public Concern: The White River National Forest Plan should exchange the Aspen Ranger District complex for land units at Highway 82 and Brush Creek.

Response: Specific land adjustment decisions are not made in through the forest planning process. The Forest Service may consider such a proposal; however, such a decision would be made after substantive consultation and NEPA process analysis.

TM215 Public Concern: The White River National Forest should obtain funding for the Beaver Brook Watershed purchase.

Response: Funding determinations are not made through the forest planning process. Funding is allocated annually by Congress, and earmarked for certain activities such as land exchanges. Such an exchange is not likely because the Beaver Brook Watershed purchase proposal is not within the administrative jurisdiction of White River National Forest.

TM216 Public Concern: The White River National Forest should acquire access to specific trails from private landowners.

Response: We identified several trails where members of the public would like the Forest Service to acquire public access from private landowners. While we recognize access as an important issue, the Forest Plan does not include any specific direction regarding the legality of access on private roads or trails. Public comments received on individual roads and trails, and the access or lack of access on these roads or trails, will be forwarded to the Travel Management Plan ID team. The Travel Management Plan will be initiated upon the completion of the 2002 Forest Plan.

Part 3—Special Use Authorizations

TM217 Public Concern: Permittees should bear responsibility for the impacts they create.

Response: Permittees are indeed responsible for the impacts they create. Each permit is issued with guidelines, stipulations, etc. to be followed. Moreover, permitted activities are expected to meet the requirements and direction found in the 2002 Forest Plan. See the Record of Decision for implementation of the 2002 Forest Plan regarding special use permit provisions.

TM218 Public Concern: The FEIS should include a detailed implementation plan for special use authorizations.

Response: Special use authorizations are site-specifically addressed. Each is unique and requires its own analysis. See the Record of Decision for the 2002 Forest Plan for a discussion of how management direction will be implemented for special use permits—such as for ski areas and grazing.

TM219 Public Concern: The White River National Forest should not issue special use authorizations for organized and promotional events.

Response: Special use authorizations and recreation event permits have been determined to be appropriate uses of National Forest System lands. Each special use application will be reviewed individually. Any permitted activity must comply with the direction found in the 2002 Forest Plan. Permits will be granted on a case-by-case basis if they are found to comply with the Forest Plan.

TM220 Public Concern: The White River National Forest should not modify current Vail Pass use permits.

Response: Special use permits must comply with direction found in the 2002 Forest Plan. See the 2002 Forest Plan Record of Decision for a discussion of how special use permit management direction will be implemented. Accordingly, the Vail Pass use permits will be reviewed and updated according to the direction in the Record of Decision.

TM221 Public Concern: Special use authorizations should be issued for access to leased grazing camps.

Response: Motorized access can be granted as a condition of a special use permit. This applies to grazing permits as well as other types of permitted activities. Each permit will be examined individually to determine appropriate terms and conditions of the permit. All applicable Forest Plan direction will be followed when granting special use permits.

TM222 Public Concern: Private property owners should be discouraged from plowing roads in winter.

Response: Winter (and summer) access to private properties is part of each right-of-way access agreement. Each agreement is designed to meet individual needs, historic access, and other considerations. The right to reasonable access was inacted in the Alaska National Interest Lands Conservation Act (ANILCA). Reasonable access is examined individually for each private access easement.

TM223 Public Concern: The White River National Forest should consider the Western Area Power Administration's historical rights for continued access along transmission line corridors and ensure that mitigation procedures are provided.

Response: Specific land use authorizations are not made in the 2002 Forest Plan. Western Area Power Administration has a specific authorization to occupy National Forest System lands. Access to transmission lines is addressed through review of each specific authorization and, thus, outside the scope of 2002 Forest Plan decisions.

TM224 Public Concern: The White River National Forest should clarify the procedure for validating existing prior use authorizations.

Response: The 2002 Forest Plan recognizes existing rights and states, "The Forest Service will certainly honor such valid outstanding rights when it is subsequently determined that the specific facts surrounding any claim to such rights meet the criteria set forth in any respective statute granting such occupancy and use" (2002 Forest Plan, *Preface, Valid Outstanding Rights*). Also see FEIS Volume 2, Chapter 3, Topic 2, Part 3 – *Special Use Authorizations, Legal and Administrative Framework*, for further infromation.

TM225 Public Concern: The White River National Forest should refer special use authorization applications to local jurisdictions and planning commissions for comment.

Response: Special uses are authorized through a variety of laws and requirements. Public involvement and NEPA analysis may be required. In addition, the 2002 Forest Plan contains a goal to "cooperatively work with local governments to address issues of common concern and to the extent possible maintain consistency with locally adopted master plans" (2002 Forest Plan, Chapter 1, Goal 5, Objective 5a.2). The Forest Service intends to authorize special uses by meeting the appropriate requirements and by working cooperatively with local governments as appropriate.

TM226 Public Concern: The White River National Forest plan should limit special use permits to current levels.

Response: New special uses permits proposals are evaluated on an individual basis and may be issued after the appropriate analysis is completed. Each application is reviewed individually, and, if requirements are met and the proposal is in compliance with the Forest Plan, the application will be considered for approval. The Forest Plan does not identify specific levels of special use permits, but it does lay out the kinds of uses that are appropriate and the standards and guidelines under which they will be allowed.

TM227 Public Concern: The guidelines for special use authorizations should be revised to allow for appropriate recreational activities at four-season Resorts.

Response: The 2002 Forest Plan establishes one special use guideline, that states, "Do not approve any special-use applications that can be reasonably met on private or other federal lands unless it is clearly in the public interest." (2002 Forest Plan, Chapter 2 – *Administrative, Special Uses*). Implementation of this guideline should result in special use permit applications taking into consideration the possibility of meeting needs on private or other lands. If areas other than National Forest System lands are considered, but there is not reasonable accommodation on other lands, the special use will be

considered on public lands Forest Service public lands. Additionally, allowing special uses on public lands must be shown to be in the public interest.

TM228 Public Concern: The White River National Forest should not allow new utility corridors unless it can be shown that public access can be controlled.

Response: Public use of certain roads or corridors is an enforcement concern and site-specific issue. Activities taking place within utility corridors must meet forest plan direction and other applicable guidance. Enforcement of access restrictions is not a forest plan decision.

TM229 Public Concern: The Final Forest Plan should include provisions for the maintenance and construction of more utility facilities as needed.

Response: The 2002 Forest Plan allows for the maintenance and construction of more utility facilities. There are utility corridors and sites identified on the management area map for management area 8.32 (Designated utility corridors – Existing and Potential). The Alternative K map can be found in the 2002 Forest Plan, Chapter 3 – *Management Area Direction*. This section also presents a description of the standards and guidelines for the 8.32 Management Area. These corridors may be presently used for utility facilities, and they may be the location for similar uses in the future. All future utility projects, like other types of projects, will have to undergo the appropriate environmental analysis and meet Forest Plan standards and guidelines and applicable law and policy. Current communication sites are identified on the 8.32 Management Area map (Chapter 3 of the 2002 Forest Plan). If conditions change and additional sites are needed to meet public demand, the Forest Plan may be amended to create additional sites.

TM230 Public Concern: The White River National Forest should close utility corridors south and west of Gypsum Creek.

Response: The current Forest Plan allows for utility corridors south and west of Gypsum Creek. These corridors are currently being utilized (see the Alternative K map, 2002 Forest Plan, Chapter 3 – *Management Area Direction*). Moreover, provisions for these corridors remain in the 2002 Forest Plan because of the existing utility line that needs access to for maintenance. Any potential activity in these areas will have to comply with all Forest-wide Standards and Guidelines (2002 Forest Plan, Chapter 2).

TM231 Public Concern: The Final Forest Plan should include a Designated Utility Corridor for the deployment of a high-speed monorail transportation facility.

Response: The 2002 Forest Plan does not contain a designated Utility Corridor for the deployment of a high-speed monorail transportation facility. Such a facility has not been approved. The monorail system is still being analyzed, and a specific route has not been requested, nor have the technical aspects (ie. grades the system can handle) been determined. If a high-speed monorail is approved by appropriate authorities (and a proposal is made that would impact National Forest System lands), the Forest Service will conduct a site-specific analysis to determine if there are conflicts with the direction in the 2002 Forest Plan. The Forest Service will work cooperatively with the Colorado Fixed Guideway Authority on any such proposals.

TM232 Public Concern: Designated Utility Corridors should be added along the transportation corridor areas near Ophir Mountain and Loveland Pass.

Response: No utility corridor has been designated for such a use. When there is an actual proposal by an interested utility company or other party for such a use, the Forest Service will conduct the appropriate analysis. However, the 2002 Forest Plan does not prohibit any such a project. Forest plans are intended to be flexible documents that should be adjusted over time to address changing conditions such as the potential for transportation system developments.

TOPIC 3
RECREATION MANAGEMENT

Part 1—Recreation Management

General Management

R1 Public Concern: The Forest Service should balance recreation and environmental values.

Response: That the Forest Service should balance recreation and environmental values is a requirement placed on the Forest Service by at least two laws and/or regulations. 36 CFR 219.21 requires the Forest Service, "to the degree consistent with needs and demands for all major resources," to provide a broad spectrum of outdoor recreation opportunities in each alternative. Further, the Federal Land Policy and Management Act (FLPMA) of 1976 sets a policy that public lands be managed "in a manner that will protect the quality of scientific, scenic, historical, ecological environmental, air and atmospheric, water resource, and archeological values" (FLPMA, Sec 102, (8)). This balancing of recreation and environmental values will be a significant consideration in the FEIS and 2002 Forest Plan.

R2 Public Concern: The Forest Service should prioritize environmental values over recreation. -and-

R3 Public Concern: Priority should be given to recreational uses that are the most compatible with sustaining biological diversity.

Response: All recreation cannot be removed from the National Forest. This is outside our legal authority. However, that the Forest Service should balance recreation and environmental values is a requirement placed on the Forest Service by at least two laws and/or regulations. 36 CFR 219.21 requires the Forest Service, "to the degree consistent with needs and demands for all major resources," to provide a broad spectrum of outdoor recreation opportunities in each alternative. Further, the Federal Land Policy and Management Act (FLPMA) of 1976 sets a policy that public lands be managed "in a manner that will protect the quality of scientific, scenic, historical, ecological environmental, air and atmospheric, water resource, and archeological values" (FLPMA, Sec 102, (8)). This will be a significant consideration in the FEIS and 2002 Forest Plan.

The Forest Service is mandated, "to the degree consistent with needs and demands for all major resources," to offer a broad range of outdoor recreation opportunities. Part of the analysis for offering these opportunities includes reviewing direct and indirect effects on biodiversity and other resources.

R4 Public Concern: Recreational opportunities on White River National Forest should be expanded.

Response: The FEIS recognizes that recreational use of the forest will continue to expand. Each of the six alternatives proposes a differing balance of recreation opportunities within the limited land base of the forest. Public comments on this issue will be considered in the FEIS and 2002 Forest Plan.

R5 Public Concern: The Forest Service should manage the forest for recreation.

Response: The Multiple Use Sustained Yield Act of 1960 requires the Forest Service to manage national forests for outdoor recreation along with the other resources. Except for a few, small administrative sites, the entire Fforest is managed for recreational uses using the Recreation Opportunity Spectrum (ROS). Each of the alternatives has a different mix of recreational opportunities under ROS.

R6 Public Concern: The Forest Service should manage recreation.

Response: Setting management direction for recreation is one of the primary goals of the forest planning process. The FEIS for the 2002 Forest Plan has six alternatives. Each of these alternatives has specific area allocations for different types of recreation uses. The selected alternative and FEIS will be prepared based on many factors, including environmental concerns, laws and regulations, use conflicts and public concerns. Site-specific decisions, such as the amount of use allocated to commercial operators, are made in separate decision documents.

R7 Public Concern: White River National Forest should engage in cooperative recreation management.

Response: The development and use of collaborative partnerships to assist the Forest Service in recreation management is expected to continue barring any law, regulation, or order banning them. Knowing and understanding the thoughts and feelings of area residents is important in making management decisions on the Forest. However, the Federal Advisory Committee Act of 1972 makes it clear that committees formed to advise federal officials on management decisions are to remain only advisory in nature and the decision-making is still the responsibility of the federal official. Further, there are strict rules in the formation and functioning of these groups. Decisions on forming advisory partnerships are outside the scope of the forest planning process.

R8 Public Concern: The Forest Service should emphasize education rather than restriction as the primary emphasis of recreation management.

Response: The use of education rather than restriction is one of the tools we use in recreation management. The Forest Service strongly supports programs such as Leave No Trace and Tread Lightly in an effort to continue allowing various types of recreational use in an environmentally friendly manner. Most of our trailheads and many backcountry roadways have information boards with messages on how to recreate on the Forest without causing harm. One Ranger District on the forest has even created a partnership to operate a low-power AM radio information system to help with public education. Unfortunately, education will never completely resolve all of our recreation resource problems. Our law enforcement personnel are taught three steps in protecting the resources on the forest: the first step is education, the second is engineering (i.e., closures or travelway design), and the last step is enforcement.

Development of education programs will continue to be an important tool in recreation management. Details of these programs are site specific and outside the scope of this planning process.

R9 Public Concern: White River National Forest should allow a range of recreational uses.

Response: The National Environmental Policy Act of 1970 requires that we evaluate a range of alternatives for resource management including recreational uses. In the DEIS, the Forest developed six distinct alternatives. Each of these alternatives allows a broad range of recreational uses at varying levels. This is displayed in Recreation Opportunity Spectrum (ROS) Table 3-80, and in Figures 3-23 and 3-24 in Chapter 3 of the FEIS.

R10 Public Concern: The Forest Service should not restrict mountain biking and skiing.

Response: By law, bicycles are automatically excluded from designated wilderness. Ski areas will be limited by the amount of land allocated to them in this forest planning process. Public input on these two activities will be considered during the process to revise the forest plan.

R11 Public Concern: The Forest Service should restrict recreational uses.

R11.1 Mechanized

R11.2 Motorized

R11.3 Snowmobiles

Response: Most recreational uses will be restricted in some manner in the 2002 Forest Plan. However, 36 CFR 219.21 requires that we analyze a broad range of outdoor recreational opportunities. Where specific recreational opportunities conflict with other management needs or goals, decisions will need to be made on restricting that particular type of use or having the other needs flex to accommodate the use. The 2002 Forest Plan will continue to provide a mix of recreation opportunities on the Forest. Public comment on restricting or emphasizing some activities more than others will be considered in the process of revising the forest plan.

R12 Public Concern: The Forest Service should concentrate high-impact recreational uses in designated areas.

Response: The concentration of high-impact recreational uses in designated areas is one of the management strategies considered in all alternatives. Examples include allowing more summer use on existing ski areas already developed for winter use, providing "hardened sites" in developed campgrounds and in areas of high-use dispersed camping, and proposing to restrict summer motorized and mechanized uses to designated routes only, such as in Alternative D. Public comment will be considered, along with other factors, in developing management strategies in the 2002 Forest Plan.

R13 Public Concern: White River National Forest should consider implementing a rotation system for recreation land use.

Response: In some cases, we have implemented a rotation system for recreational land use. The best example of this for managing recreation use is the Levels of Acceptable Change (LAC) model used to monitor campsite use in Wilderness—campsites are used until a threshold level of acceptable environmental damage is reached. At that point, the campsite is closed until it recovers acceptably and the camping use moved to another

location. Once the campsite has recovered, use is again allowed. The Forest will continue to consider this tool for recreational use management along with all other implementation tools.

R14 Public Concern: The Forest Service should offer more family-oriented recreational opportunities in White River National Forest.

Response: Several alternatives in the FEIS analyze increasing the availability of what may be referred to as "family-oriented" recreation opportunities on the forest. Alternatives E and F increase the amount of open motorized travel mileage above current levels. Conversely, Alternatives D, E, F and C provide increased dispersed camping opportunities. The 2002 Forest Plan attempts to blend the desires of recreation users with other resource needs. Public comment will be considered, along with other factors, in developing management strategies in the 2002 Forest Plan.

R15 Public Concern: The Forest Service should consider the ability of private

Response: In preparing the analysis for the 2002 Forest Plan and FEIS, the Forest Service considered the opportunities currently being offered on private lands adjacent, or near, the forest. We do not speculate on specific uses that are not reasonably foreseeable to exist in the future on private lands. Prior to approving new uses on the National Forest, we need to determine if the use is accommodated on private lands in the area. The 2002 Forest Plan only addresses land allocations and uses on lands managed by the Forest Service.

R16 Public Concern: White River National Forest should reevaluate the impacts of dispersed recreation on the forest landscape.

Response: We recognize that every human use on a national forest, including recreation, has some impact. The FEIS analyzes many of these impacts. The discussion in Chapter 3 of the FEIS evaluates the effects of recreation management and travel management on fragmentation of wildlife habitat; the effects on soils; and, the effects on water resources. This evaluation of the effects due to travel management and dispersed recreation on each resource continues throughout the environmental consequences section of the FEIS.

R17 Public Concern: Recreation management restrictions based on effects to the Lynx should be reconsidered in the forest plan revision.

Response: Some recreation management strategies will be based on potential effects to the lynx and/or potential lynx habitat. The listing of the lynx as a threatened species by the US Fish and Wildlife Service under the Endangered Species Act (ESA) of 1973 requires the Forest Service to carry out programs for the conservation of lynx and not jeopardize the species as a result of adverse habitat modification (ESA, Sec 7(a)). The most current lynx information and research is in the *Lynx Conservation and Assessment Strategy* (LCAS), which was not available prior to the release of the DEIS. Information from the LCAS will be considered in the FEIS.

R18 Public Concern: The Forest Service should address its practice of hiring private recreational management contractors.

Response: Our authority to use private parties to perform services falls under several laws and regulations, such as the Granger-Thye Act of 1950 and the National Forest Ski Area Permit Act of 1986. The issue of whether the Forest Service manages a facility, or it

is done privately, is not part of the land allocation decision required by the Rangeland Renewable Resources Planning Act of 1974. Decisions on contracting with private contractors are made via other decision-making processes.

R19 Public Concern: The Forest Service should explain what is meant by "solitude."

Response: Solitude is a state of being alone. The personal definition of what this means in forest recreation can vary from individual to individual, but usually encompasses being separated from other people. Recreation application of the word can include groups of recreationists, who choose to recreate together, but who wish to remain separate, visually, aurally, and physically from other groups; for example, a family hike to a hut. Perceived solitude sometimes incorporates people's beliefs and values and how they apply these in their experience on the Forest. In recreation management, we are essentially providing an "experience" in most cases. Thus, we need to consider factors, other than hard scientific data along with the scientific evidence in many cases. This is one of the difficulties in balancing recreational needs on the Forest and an area where public input is most helpful.

Recreation Alternatives

R20 Public Concern: Alternatives in the FEIS should address the problems created by increased recreation in the White River National Forest.

Response: The FEIS addresses problems created by increased recreation use in the Recreation Management section in Chapter 3 of the FEIS.

R21 Public Concern: The Forest Service should select an alternative that emphasizes skiing and other recreational uses.

Response: Downhill skiing is a component of each of the 7 alternatives. Table 3-88, Chapter 3,shows a range from 43,195 to 91,243 acres for all 7 of the alternatives. Alternatives B, C, E, F, and K all allow for an increase in permitted skiing acres over the 41,744 acres under permit in 1996. Public comment was used in formulating the FEIS and Final Forest Plan.

R22 Public Concern: The Forest Service should clarify the effects of Alternative D on recreation on the east side of the Vail Ski Area.

Response: The existing condition for this area, displayed in Alternative B, is Management Area 3.32 (backcountry non-motorized recreation, winter motorized). In Alternative D, the primary emphasis for the area is Management Area 5.45 (forest carnivores). These management areas may be compared by reviewing the details of the two management prescriptions in the 2002 Forest Plan. Since the publication of the DEIS, the lynx has been listed as a threatened species by the US Fish and Wildlife Service. No matter what management area designation is selected, some recreation management strategies will be based on potential effects to the lynx and/or potential lynx habitat. The listing of the lynx as a threatened species by the US Fish and Wildlife Service under the Endangered Species Act (ESA) of 1973 requires us to carry out programs for the conservation of lynx and not jeopardize the species as a result of adverse habitat modification (ESA, Sec 7(a)). The most current lynx information and research is in the *Lynx Conservation and Assessment Strategy* (LCAS), which was not

available prior to the release of the DEIS. Information from the LCAS will be considered in the FEIS.

R23 Public Concern: The approach of Alternative D toward recreational opportunities should be reconsidered.

Response: Alternative D maintains and allows some expansion of existing development and emphasizes recreational opportunities toward the semi-primitive and primitive end of the Recreation Opportunity Spectrum. Alternative D was selected as the preferred alternative of the six alternatives analyzed following review of the DEIS. The FEIS and 2002 Forest Plan will be based on many factors including public comment on the draft documents as required in 40 CFR 1503.4(a) and 1504(b).

R24 Public Concern: The Forest Service should address safety issues likely to arise if Alternative D is implemented.

Response: The FEIS addresses safety concerns in all of the alternatives, including Alternative D.

Recreation Goals and Objectives

R25 Public Concern: The Forest Service should implement Objective 2.1c, improving dispersed recreation sites.

Response: The implementation of Objective 2.1c in the 2002 Forest Plan to improve dispersed recreation sites is a budget issue. Budget allocations are done by Congress through the Interior Appropriations Bill and then divided among the Forest Service units. Budget and budget-priority setting are outside the scope of this forest planning process.

R26 Public Concern: The Forest Service should add an objective to fulfill Goal 2.1.

Response: Strategies 2a.5 and 2a.9 were added in the final forest plan to address the Goal 2.1 as it relates to ski areas and other partners in recreation programs.

Recreation Standards and Guidelines

R27 Public Concern: The Forest Service should revise the standards and guidelines for recreation and travel.- and -

R28 Public Concern: The dispersed recreation section of the FEIS should include additional standards and guidelines.

Response: Recreation management analysis in the FEIS is based on the best available science known to the Forest staff at the time of document preparation. For management decisions to be well thought out they also need to consider many additional factors such as safety, law, use conflicts, public opinion, need and other components that may not have a direct grounding in scientific research. The FEIS and final Forest Plan attempt to balance all of these factors.

Recreational Opportunity Spectrum

R29 Public Concern: The Forest Service should work to maintain the semi-primitive recreation opportunity spectrum class.

Response: The semi-primitive recreation opportunity spectrum classes (motorized and non-motorized) makes up the largest single class of recreational opportunities on the forest. In Alternative I, the summer non-motorized class actually has an increase over the current management situation. Public comment will be considered, along with other factors in making a final decision.

R30 Public Concern: Management activities should comply with the requirements of the adopted summer and winter Recreational Opportunity Spectrum classes on the Recreational Opportunity Spectrum maps.

Response: The White River Forest Plan will be the first forest plan in the nation to look at separate recreation plans for the summer and winter. All other plans, including the current White River plan, just do minor adaptations on the summer plan for winter use. One-half of the Recreation Opportunity Spectrum allocations identified in the FEIS are specific to winter. All of the 7 alternatives analyzed have mixed use, motorized and non-motorized areas at varying levels. Other strategies include trail separations and education in specific areas.

R31 Public Concern: The Forest Service should explain the reasoning behind the urban recreation opportunity spectrum allocations in Alternative I.

Response: Allocation to various management prescriptions in the alternatives were driven by the alternative's theme. These land allocations varied due to specialists' input and public comment during the scoping periods.

R32 Public Concern: The Forest Service should reclassify the Recreation Opportunity Spectrum for skiing.

Response: The recreation opportunity spectrum (ROS) is a nationally recognized tool used for classifying recreation uses on National Forest System lands. Skiing is recognized and included within the categories already identified under the ROS system. Changing classifications under ROS is a national-level management task and outside the scope of this forest planning process.

R33 Public Concern: The Forest Service should assign additional acreage to the primitive side of the recreation opportunity spectrum in Alternative D.

Response: Alternative D was one of six alternatives looked at in the analysis process for the DEIS. While Alternative I assigns considerably more acreage to the non-motorized and primitive recreation opportunity spectrum classes than Alternative D, adding more non-motorized and primitive acres to Alternative D would make it very similar to Alternative I—adding nothing to the analysis process and reducing the range of alternatives analyzed in the FEIS.

Recreation Fees and Funding

R34 Public Concern: The Forest Service should address the use of fees for recreating on public lands.

R34.1 Eliminate Fees

Response: The ability to charge fees on National Forest System lands is a site-specific decision and not a part of the forest planning process, which is aimed at land allocation. Congress has authorized a program, called the Recreation Fee Demonstration Project, on various public lands across the country, including limited sites on national forests. We will continue to look at this tool as one of the many ways to accomplish needed work on the forest.

The license fee on snowmobiles, dirt bikes, ATVs and boats is charged by the State of Colorado and administered by the Colorado Division of Parks and Recreation. The Federal government is ineligible to apply for any of these funds for maintenance or improvements on the forest. The only way to get these funds onto the forest for road or trail maintenance or improvement is for a private user group to apply for them. The Flat Toppers Snowmobile Club has successfully applied for some of these funds in the past to assist in snowmobile route signing on the Flat Tops.

R35 Public Concern: The Forest Service should consider alternate fee systems.

R35.1 Use Permits

R35.2 Season Pass

R35.3 Volunteer Work in Lieu of Fees

R35.4 Renting Trails for Specific Use

Response: The Forest Service is considering alternate fee systems where appropriate. Three locations on the forest are operated under the national Recreation Fee Demonstration (RFD) program. In addition, the forest is looking at other programs, such as a cabin rental program to help with the upkeep and maintenance of historic structures. Nationally, Congress has extended the RFD program through 2002. Any new sites, other than in limited cases such as cabin rentals, must be approved at the national level and come under a national cap set by Congress. The use of RFD is one tool available to help implement specific Forest programs. Decisions on implementation of these programs are done on a site-specific basis and are outside the scope of the decisions made in this forest-planning process.

R36 Public Concern: The Forest Service should require backcountry users to carry a Search and Rescue card.

Response: The Forest agrees that the search and rescue card offered by the State is a valuable tool to offset the costs of backcountry rescues. However, the sale of the voluntary card and search and rescue are State of Colorado programs that Service has no legal jurisdiction over. Any requirement for purchasing this card would have to come from the State. State law is outside the scope of this forest planning process.

R37 Public Concern: The Forest Service should address the allocation of user fee funds.

Response: Congress controls the allocation of funds from fees collected for uses on national forests. Traditionally, Congress returns fees collected for uses on national forests directly to the Federal treasury for disposition; however, there are some exceptions. The most notable of these is the recent allowance for the Recreation Fee Demonstration Project. This temporary pilot project allows 80 percent of any new recreation fees collected to stay on the site where collected and the remaining 20 percent to stay within the state where collected.

Congressional allocation of funds related to national forests is outside the scope of forest planning and the decisions we can make in a forest plan under the Forest and Rangeland Renewable Resources Planning Act of 1974.

R38 Public Concern: The Forest Service should require backcountry hut associations to use fee revenues for trail maintenance and user education.

Response: In order for the Forest Service to require hut associations and other national forest permittees to maintain trail systems, a site-specific addition would have to be made to the special use permit itself. Details on specific special use permits are beyond the scope of this planning process.

R39 Public Concern: Access fees on the White River National Forest should reflect the use impacts to the Forest.

Response: Access fees on the forest are authorized under a pilot program called Recreation Fee Demonstration (RFD). Congress' intent is to allow the Forest Service, and other federal land management agencies, to experiment with a program of charging fees for recreational use to help with the management of specific locations. Nationally, some locations are trying to differentiate fees based on user type. Following an evaluation period, programs will be adjusted based on results of that program or based on results of a program elsewhere in the country. It is anticipated that national policy and other issues will come out on this should this fee program be made permanent. Until that time, comments on specific RFD projects need to go to the District managing the area for decisions on adjustments to that specific program. Overall, fees and budget are a part of program implementation and site-specific decisions on these are not within the scope of this forest-planning document.

R40 Public Concern: The Forest Service should retain the Recreation Fee Demonstration program at Vail Pass.

Response: The decision on whether to retain the fee demo program on Vail Pass or not is a site-specific decision done at the District level. This particular decision is not within the scope of this forest-planning process.

R41 Public Concern: The Forest Service should address funding requirements to meet recreation infrastructure demands.

R41.1 Prioritize Maintenance Of Existing Facilities Over New Construction

R41.2 Determine Proper Source And Allocation

R41.3 Account for the Effects of Various Budget Scenarios

Response: Funding to meet recreation infrastructure demands and needs identified in the forest planning process comes from Congress through the Interior Appropriations Bill. At the current rate of funding, we recognize there will never be enough funds to manage the entire infrastructure to standard relying only on Congressional appropriations. However, we cannot "close the doors" to use just because there are no funds to build and maintain facilities. Instead, we are looking at other tools, such as using volunteers, to accomplish some of the work. This annual funding and effort to accomplish work is part of implementing a forest plan and outside the scope of the forest-planning process.

R42 Public Concern: White River National Forest should supplement Agency funding for recreation management.

R42.1 Apply for Grants

R42.2 Use Partnerships, Public/Private Ventures, and Volunteer Programs

R42.3 Use Locally Collected Revenue

Response: Within legal authority, we continue to look at new methods to accomplish recreation management work previously funded through Congressional appropriations. For example, most campgrounds on the forest are operated by private concessionaires; volunteers perform over 50,000 hours of work on the forest per year; a cross-country ski permit is being converted to a resort permit, so the operator will have to construct and maintain the buildings rather than us; and three sites on the forest are currently operated under the new Recreation Fee Demonstration program. Numerous partners, such as Summit Fat Tire Society, Aspen Center for Environmental Studies and Mount Sopris Rec Riders, assist us in providing recreational needs. Individual Ranger Districts on the forest have applied for and received numerous grants; however, many grants for outdoor recreation exclude federal government entities from applying. In these cases, we work with partners eligible to pursue these grants Accomplishing the annual program of work is part of forest plan implementation and outside the scope of the resource allocation decisions within the 2002 Forest Plan itself.

R43 Public Concern: White River National Forest should allocate permanent funding for monitoring recreational use levels.

Response: The allocation of funding for monitoring recreational use levels is performed on an annual basis following Congressional allocations. Decisions on setting priorities for the use of limited annual funding is outside the scope of this forest plan analysis process.

R44 Public Concern: White River National Forest should increase recreation funding and staffing to meet increased demands resulting from the adoption of Alternative D.

Response: Increases in recreation funding and staffing come through annual Congressional appropriations and are not under our control. Increased numbers of visitors are anticipated in all alternatives in the FEIS. Alternative D actually requires less funding and staffing to meet management needs than some of the other alternatives, such as Alternatives B, C, E and F that expand recreation use, resulting in more resources to manage. Annual funding allocations are outside the scope of this land allocation analysis.

Recreation Capacity/Demand

R45 Public Concern: The Forest Service should provide for future recreation demands in the forest plan Amendment.

Response: The FEIS for the 2002 Forest Plan recognizes and analyzes the anticipated increased recreation demands placed on the forest. The Recreation Management section in the FEIS addresses changing trends, theoretical site capacities and the possibility of reaching capacity in some aspects of recreation before the end of this next planning period. Simply continuing to increase the capacity of each of the perceived recreational demands within the limited land base of the forest is not a sustainable option in the long run. Further, 36 CFR 219.21 requires the Forest Service, "to the degree consistent with needs and demands for all major resources," to analyze a broad spectrum of outdoor recreation opportunities. This means the forest needs to be managed not only for outdoor recreation, but also for all major resources, including wildlife, water, vegetation, visuals, etc. The 2002 Forest Plan and FEIS will balance the demands for outdoor recreation with the needs of other resources.

R46 Public Concern: The Forest Service should consider and disclose the likely continued growth in recreation use on the White River National Forest.

Response: Chapter 3, Topic 3, Part 1 in the FEIS discloses the projected increase in recreation use on the White River National Forest through the year 2020, which is beyond the life of this planning document. The impacts of this increased use on developed sites are also disclosed. Table 3-82 Chapter 3 in the FEIS addresses dispersed recreational use. And, Table 3-83 addresses Wilderness use. The anticipated impacts associated with projected recreation use are described by alternative in the FEIS.

R47 Public Concern: The Forest Service should estimate practical carrying capacities for dispersed and Wilderness recreation.

Response: Practical carrying capacities were a part of the calculations used to estimate dispersed and Wilderness recreation capacities in the FEIS. With the exception of Management Area 1.11 (pristine Wilderness), which has no trails to base calculations, capacities in areas outside developed recreation sites are determined using a "linear by linear" process. This process bases the capacity of a particular area on a reasonable capacity of the developed transportation system within that area. The calculations used in the linear by linear process are based on several factors including ROS of the area, vegetative cover type and acceptable social contacts. This approach generally gives much lower area capacities than other forms of analysis.

R48 Public Concern: The Forest Service should manage human demand within the constraints of ecological function and sustainability.

Response: The Multiple-Use Sustained-Yield Act of 1960 states that the Forest Service must have a high level of annual output without impairment of the productivity of the land. The Forest Service recognizes that human use does have an impact on the ecology of the forest. The 2002 Forest Plan will attempt to balance human demands with the long-term sustainability of the forest.

R49 Public Concern: The Forest Service should not use projected demand to justify projects that surpass the carrying capacity of the forest.

Response: Projected demand is one of the factors used in deciding what recreational opportunities to offer on the forest. Carrying capacity is another one of those factors. Other factors used include: Is this an appropriate use of the National Forest? Can this demand be reasonably met on private lands near the forest? And, what are the environmental consequences of the individual action?

The National Environmental Policy Act of 1974 ensures that demand alone will not be the only consideration in project decision-making.

R50 Public Concern: In light of the increased demand for motorized recreation, the Forest Service should justify its reduction of acres available for that activity.

Response: The reduction of acres available for motorized recreation may be traced to several elements. In some cases, better technology has enabled us to produce better maps. This has resulted in removing some areas from motorized prescriptions that are physically incapable of having motorized use. For example, a steep cliff face may have previously been designated as open to snowmobiling. Other areas may be removed because of a change in law. An example would be the listing of the lynx as a threatened species by the US Fish and Wildlife Service and our subsequent legal obligation under the Endangered Species Act of 1973. In other areas, new research may show that a particular motorized use is detrimental to another key Forest resource.

The White River National Forest is a limited land base and all types of Forest recreational use are projected to increase. To continue allocating more area for a particular use because it is increasing would be unsustainable in the long run and a detriment to other uses. The 2002 Forest Plan will attempt to create a balance of uses.

Motorized Recreation

R51 Public Concern: The Forest Service should explain what is meant by "semi-primitive, motorized recreation."

Response: The term "semi-primitive, motorized recreation" comes from the Forest Service's Recreation Opportunity Spectrum (ROS) Handbook. ROS is a framework for stratifying and defining classes of outdoor recreation environments, activities and experience opportunities. The seven ROS classes are Primitive, Semi-Primitive Non-Motorized, Semi-Primitive Motorized, Roaded Natural, Roaded Modified, Rural and Urban. Each has recreation management guidelines for: experience, physical setting, social setting, managerial setting, access, mode of travel, vegetative alterations, timber harvest access and pattern, signing, etc.

Semi-primitive, motorized areas are characterized by the following: moderate opportunities for solitude, tranquility and closeness to nature; predominantly natural-appearing landscapes; a low concentration of users, but with evidence of other users; on-site controls and restrictions in the area are limited and subtle; vegetative alterations are widely dispersed, small in size and few in number. Users of these areas characteristically have a high degree of self-reliance and are looking for challenge when using their motorized equipment. A summary of ROS may be found in Chapter 3, Topic 3, Part 1 of the FEIS.

R52 Public Concern: The Forest Service should clarify the distinction between off-road vehicle and unrestricted mechanized use.

Response: The Forest Service attempts to clarify the distinction between off-road motorized vehicle use and unrestricted mechanized use in the FEIS. A new area strategy labeled "H," as explained in the FEIS, was even created to highlight the distinction. The category of off-road motorized vehicles includes jeeps, ATVs, motorcycles, helicopters—any means of transportation that uses a motor for movement and transportation. The mechanized-use category includes mountain bikes, rollerblades, game carts—any form of transportation where a non-motorized mechanical advantage is used.

R53 R296 Public Concern: The Forest Service should improve management of existing motorized areas to curb illegal motorized access.

Response: The level of management motorized areas receive is a budget and resource allocation issue determined annually on the forest, as well as a part of implementing forest plan goals and objectives. Prioritization of the annual program of work is outside the scope of this forest planning process.

R54 Public Concern: White River National Forest should provide opportunities for all recreational users.

Response: The White River National Forest will continue to provide a wide range of outdoor recreational opportunities that are compatible with the Forest Service mission. The Federal regulation 36 CFR 219.21 requires that the Forest Service look at a broad range of outdoor recreation opportunities. This was done in the six alternatives analyzed in the DEIS.

R55 Public Concern: The Final Forest Plan should limit motorized vehicles to specific 50-acre or 100-acre parcels.

Response: Limiting off-road vehicles to 50- or 100-acre parcels is just one management strategy to separate uses on the forest. Another strategy would limit vehicles to the immediate road, trail, or corridor. The Forest looked at these options to varying degrees in the six alternatives in the DEIS. Consideration will be given to both of these strategies as they affect the recreational experience on the forest and other resources in the 2002 Forest Plan and FEIS.

R56 Public Concern: A reservation in eastern Colorado should be set aside for snowmobiles, ATVs, and 4-wheelers.

Response: Setting up a reservation in eastern Colorado for snowmobiles, ATVs and four-wheelers is outside the scope of this planning process, which only addresses lands of the White River National Forest. However, we cannot completely exclude snowmobiles,

ATVs and four-wheelers from the forest without some very compelling information that these uses are incompatible with other key resource management objectives. 36 CFR 219.21 requires us to analyze a broad spectrum of outdoor recreational opportunities in our planning process. The 2002 Forest Plan will try to balance these uses with other recreation uses and the other resources on the forest.

R57 Public Concern: The Forest Service should recalculate winter motorized acreages to include areas of influence outside the 30-foot-wide motorized corridor.

Response: For all alternatives analyzed in the FEIS, if a designated motorized route passed through a land area polygon, the entire polygon was analyzed as a motorized area. In some cases, this was a narrow corridor, but never to the 30-foot-wide level; in others, these motorized areas are several thousand acres.

R58 Public Concern: The Final White River National Forest Plan should restrict motorized recreation in the vicinity of huts.

Response: The areas immediately around most of the huts are closed to motorized travel. Areas may be closed by defining the area and designating it as a developed site, or the area may be defined and closed through a Forest Supervisor's special order. These closures are done at the site-specific level, not at the forest planning level. Motorized use outside of these closed areas falls under the management guidelines identified in the 2002 Forest Plan for that specific area. Many of the huts were constructed in areas open to winter motorized travel under the existing Forest Plan because motorized access was necessary to construct the hut in the summer and needed for hut maintenance in the winter. Further, many of the travel routes to the huts are through winter motorized areas. Alternatives D and I are the most restrictive of the six alternatives analyzed in the DEIS for winter motorized recreation and separation of uses. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R59 White River National Forest should limit or prohibit motorized recreation in Coal Basin.

Response: Coal Basin was analyzed as being closed to motorized use in Alternatives D, E and I in the summer, and Alternatives E and I in the winter. Public comment on this issue will be considered along with other factors in making a final decision in the forest plan.

R60 Public Concern: The Final White River National Forest Plan should close the areas around Miner's Creek to winter motorized use.

Response: This comment is not analyzed in any alternative, hence beyond the scope of this document. Any decision restricting this are would require a new analysis.

R61 Public Concern: White River National Forest should regulate the number of recreational vehicles in Crystal City ghost town.

Response: The road through Crystal City ghost town is a Gunnison County system roadway and does not come under the jurisdiction of the Forest Service. Any regulation on the roadway would need to come from the Gunnison County government.

Snowmobiles

R62 Public Concern: Areas currently designated for snowmobile use in the current Forest Plan should remain so in the 2002 Forest Plan.

Response: Alternative B is a continuation of the current management situation on the forest. This alternative allows snowmobile use to continue in areas currently designated as open for that use. Public comment on this issue will be considered along with other factors in making a final decision in the forest plan.

R63 Public Concern: The Forest Service should not restrict snowmobile use for wildlife or habitat protection.

Response: Many species of wildlife are active in the forest in the winter. Most notable is the lynx, recently listed as threatened by the US Fish and Wildlife Service, and its primary prey, the snowshoe hair. Elk and other species may travel in snow up to three feet deep a snow depth that is more than sufficient to operate snow machines. *Research, Effects of Winter Recreation on Wildlife of the Greater Yellowstone Area: A Literature Review and Assessment* shows that snowmobiles do have impacts, even over several feet of snow. Snow compaction from snowmobiles can cause increased competition for prey important to lynx; oil residues from the incomplete combustion of two-cycle engines can reduce water quality; and noise and activity can cause additional stress to animals that are less active during the winter months. In the current Forest Plan and all alternatives proposed in this revision process, we restrict snowmobile use in areas of wildlife winter range.

R64 Public Concern: The Forest Service should continue to allow snowmobiles in Vail Pass, Swan River Basin, and Miners Creek.

Response: Alternative B of the FEIS analyzed continuing existing snowmobile uses as they are currently managed across the forest. Public comment on this issue will be considered along with other factors in making a final decision in the forest plan.

R65 Public Concern: The Forest Service should reduce amount of acreage where snowmobiles can travel to one-third of the entire forest.

Response: Alternative I analyzed reducing the amount of acreage where snowmobiles may travel to only 27 percent of the total Forest. Public comment on this issue will be considered along with other factors in making a final decision in the 2002 Forest Plan.

R66 Public Concern: The Final White River National Forest Plan should institute winter travel restrictions for Ski Cooper, Chicago Ridge, and Jones Gulch.

Response: The alternatives in the DEIS looked at travel restrictions for Ski Cooper, Chicago Ridge and Jones Gulch. In all six alternatives, the developed area for Ski Cooper was analyzed as Management Area 8.25, which does not allow public winter motorized use. The areas of Chicago Ridge and Jones Gulch were designated as limited winter motorized or winter non-motorized in the analysis of Alternative I. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R67 White River National Forest should limit or prohibit snowmobile use in specific areas.

R67.1 Maroon Creek Valley

R67.2 Summit County

R67.3 St. Johns Ghost Town

Response: Snowmobiling is recognized as a legitimate use of national forests in some areas. 36 CFR 219.21 requires the Forest Service to look at a broad range of outdoor recreational opportunities in the forest planning process. Chapter 3, Topic 3, Part 1 of the FEIS shows the relative levels of acres where snowmobiling is allowed on the forest. In all alternatives, except Alternative F, there is a decline in acres where winter motorized use is allowed. In Summit County, Alternatives D, E and I have the fewest acres open to snowmobiles. Public comment on this issue will be considered along with other factors in making a final decision in the forest plan.

R68 Public Concern: The Forest Service should clarify how the minimum snow depth for oversnow travel is applied and enforced.

Response: Chapter 3, Topic 3, Part 1 of the FEIS identifies the minimum snow depth for over-the-snow machines to be at least six inches. This snow depth is believed to be enough to cover and protect underlying resources and block most non-over-the-snow motorized use. Enforcement of these regulations is done by trained law enforcement personnel; however, some discretion in issuing violation notices is needed as there are times when little or no resource impacts will occur from a snow machine going over a surface with little or no snow (e.g., a snowmobile on a paved, graveled or frozen native road surface for a short distance to reach suitable snow). At other times, this practice could cause resource damage and the officer may decide to issue a violation notice. In either case, enforcement of regulations is done on a site-specific basis and is outside the scope of this forest planning process.

R69 Public Concern: An Agency other than the Forest Service should address the noise and pollution concerns associated with two-cycle engines.

Response: Addressing noise and pollution concerns associated with two-cycle engines has been appropriately identified as outside the scope of the Forest Service and this forest planning process. Pollution and noise from some motorcycles, snowmobiles and personal watercraft is a recreation issue across the country.

Non-Motorized Recreation

R70 Public Concern: White River National Forest should give priority to non-motorized and non-mechanized recreation.

Response: To completely eliminate all forms of motorized and mechanized uses from the forest is not within the legal scope of a forest plan. 36 CFR 219.21 requires that we look at a broad range of outdoor recreational opportunities in our Forest Plan. The values of solitude and quiet, pristine settings are generally associated with Wilderness. Each of the six alternatives proposed in the DEIS has varying levels of proposed Wilderness. None of the alternatives proposed any reduction in the 754,344 acres of wilderness currently designated on the forest. Areas outside Wilderness will be evaluated to determine what the appropriate management strategy is concerning motorized and/or mechanized use.

Public input will be one of many factors considered in the 2002 Forest Plan in balancing forest uses.

R71 Public Concern: The Forest Service should reallocate a greater percentage of lands for non-motorized recreation.

Response: Areas currently designated as non-motorized in the 1984 Forest Plan were will remain so in Alternative B of the FEIS. Non-motorized areas in various locations on the forest are also included in the other alternatives. Management strategies in Alternative B, as well as all other alternatives, will be considered along with public input in formulating the 2002 Forest Plan and FEIS.

R72 Public Concern: Non-motorized uses should be considered as a whole category.

Response: For some purposes, all non-motorized uses are similar enough they can be considered as one category for management purposes. However, other circumstances, such as impact on trails, legal requirements, user conflicts and experience, and resource needs for a particular use, have us looking at mechanized uses separately from non-mechanized uses. One example is access into Wilderness where mechanized uses are prohibited. Another example would be looking at the amount of trail length needed to accommodate a mountain biker in a given amount of time versus the trail length needed by a hiker over the same time period. Keeping these separate designations allows us to better match the management needs of an area with the use and eliminating a lot of confusion over exceptions. Input on only having one non-motorized designation for recreational uses will be considered along with several other factors in developing the 2002 Forest Plan.

R73 Public Concern: The Forest Service should designate additional non-motorized recreation acreage outside Wilderness.

Response: Increasing the amount of non-motorized acreage on the forest outside Wilderness was analyzed in Alternatives C and I for summer, and in Alternatives C, D, E and I for winter. Public comment will be considered, along with other factors in making a final decision.

R74 Public Concern: Sensitive, above-treeline and riparian areas should be restricted to foot travel only.

Response: Restricting travel in specific areas, such as those above-treeline and/or riparian areas, is part of the site-specific decision that will be made in the Travel Management Plan Public comment will be a part of the consideration in the development of that plan.

R75 Public Concern: White River National Forest should establish designated backcountry campsites in heavily used areas.

Response: The establishment of designated backcountry campsites in heavily used areas is one of the management strategies employed by us to help manage and protect the resources in a particular area. This technique is used extensively across the forest in both wilderness and non-Wilderness settings. Decisions on using this management technique are site specific and beyond the scope of this forest planning process.

R76 Public Concern: The 2002 Forest Plan should restrict horses to those areas where they do minimal environmental damage.

Response: The FEIS did not analyze restricting horses to areas where they do minimal environmental damage. The Forest has chosen to analyze this issue at the site-specific level. In areas where horses have been identified as the definite cause of unacceptable damage, we have worked with the persons responsible to resolve the issue. Two examples are the Williams Lake Trail on the Aspen District and the Granite Lakes Trail on the Sopris District where outfitter/guide use is restricted when trail conditions are not able to handle horse use.

Nordic Skiing

R77 Public Concern: The Forest Service should enhance nordic facilities in the Peninsula area of Dillon Reservoir.

Response: A decision to enhance existing Nordic facilities in the Peninsula area of Dillon Reservoir is a site-specific decision, much the same as a proposed ski area expansion would be. A separate planning process, outside this land allocation process, would need to be completed.

R78 Public Concern: Figures given for cross-country skiing in the FEIS should include other non-motorized winter recreation.

Response: The figures given for cross-country skiing include figures for snowshoeing and other backcountry non-motorized uses.

Boating

R79 Public Concern: The 2002 Forest Plan should allow kayaking on Wild and Scenic Rivers.

Response: No proposals were analyzed in the FEIS or in the 2002 Forest Plan that place restrictions on kayaking on Wild and/or Scenic river segments.

R80 Public Concern: The Forest Service should limit commercial and private boating in Glenwood Canyon.

Response: Placing limits on boating by private parties or commercial users in Glenwood Canyon is a site-specific decision. For several years, the Eagle District has been looking into implementing this management strategy for commercial operators. Comments on this issue need to be directed to the Eagle District for their evaluation.

R80.1 Limit Numbers of Motorized Watercraft on Lakes

Response: The Forest Service does not limit the number of motorized watercraft on lakes within the forest other than to allow or prohibit motorized use altogether. Setting limits requires a site-specific analysis on a lake-by-lake basis. This level of planning is outside the scope of this forest planning process.

R80.2 Limit User Days on the Arkansas River

Response: Colorado State Parks, the Bureau of Land Management and the Pike-San Isabel National Forest are jointly responsible for limiting user days on the Arkansas River. The Arkansas River does not flow through the White River National Forest; therefore, issues dealing with it are outside the scope of this forest planning process.

Mechanized Recreation

R81 Public Concern: The 2002 Forest Plan should keep trails open to summer mechanized use in the Soda Creek area.

Response: A range of alternatives was analyzed in the process that varied in the management area prescriptions and associated travel management restrictions applied to various portions of the forest. Management Area including Soda Creek. 5.43 provides for travel closures to protect elk habitat values. The specific objectives for each polygon of Management Area 5.43 will be identified in the 2002 Forest Plan along with the seasonal dates of travel restrictions.

R82 Public Concern: The Forest Service should retain mechanized recreation opportunities on the Ryan and Salt Lick Gulch Trail System.

Response: The mechanized recreation opportunities in the Ryan Gulch/Salt Lick Gulch area were addressed in all alternatives in the DEIS. Each alternative has varying levels of open trails. Alternative B analyzed keeping all current trails open to mechanized use. Public comment will be considered, along with other factors in developing the area management strategies for the 2002 Forest Plan.

R83 Public Concern: The Forest Service should use measures other than mountain bike sales to determine use.

Response: The increase in mountain bike use on the forest as shown in Chapter 3, Topic 3, Part 1 is from actual annual-use reports compiled by the Ranger Districts on the forest. In many cases, these are based on actual-use counts by volunteers and Ranger District staff, or through the use of magnetic trail counters with their accuracy verified. The projections presented in the FEIS are based on a linear model and the work done by Cordell et al., 1993, stating that activities similar to mountain biking are expected to increase 200 percent from 1987 to 2020 in the Rocky Mountain region.

R84 Public Concern: The Forest Service should place some roadless areas in a management status that prohibits new roads and other developments, while allowing mountain biking.

Response: Placing a protective management status on roadless areas that prohibits new roads and other road-dependent developments is now being analyzed on a national scale by the Forest Service. The final decision arising from this analysis will be incorporated into the 2002 Forest Plan. The determination on whether to allow mountain bicycling in these areas will be a part of this national policy and any site-specific analysis will be done on the forest as needed.

R85 Public Concern: The Forest Service should upgrade appropriate trails for mountain biking to wheeled-use standards.

Response: Trails designated as open to mountain bike use in the new Travel Management Plan will have standard design and maintenance criteria for that use. Upgrading trails to a new standard, where needed, will be a function of available resources to perform the work.

R86 Public Concern: White River National Forest should focus mountain bike management on heavily used areas.

Response: Setting priorities for the management of mountain bike trails is done on an annual basis considering budget, physical resources and competing needs and is beyond the scope of this forest planning process.

R87 Public Concern: White River National Forest should ban the use of "summer-time boards."

Response: The use of summer-time boards comes under the regulations proposed for mechanized use on the forest. In all alternatives, except Alternative B, mechanized use is restricted to designated routes only. These routes should be hardened enough to accommodate this use along with mountain bikes and other uses so the environment is not negatively impacted. Public comment on this issue will be considered along with other factors in making a final decision in the 2002 Forest Plan.

Access

R88 Public Concern: The Forest Service should not limit access.

Response: The forest planning process is not aimed at limiting access to the forest. Rather, it is intended to look at a range of alternatives for all Forest resources and needs, including recreation. It also gives the Forest Service manager, who has to make a decision about all the competing needs for a limited resource, the best information available to make a decision. To create a balance among all resources and recreational uses will mean that some uses may need to be restricted. With the exception of a few small administrative sites, there will be open access to the entire Forest by the general public. The difficulty comes in that the access may only be by foot in some areas and by motorized or mechanized travel in other areas as necessary to meet all Forest resource objectives. Public comment will be considered in the decisions aimed at achieving balance in the 2002 Forest Plan.

R89 Public Concern: The Forest Service should provide recreational access for those with limited mobility.

Response: Recreational access will continue to be provided for those persons who rely on motorized access to get into the forest. Chapter 3, Topic 3, Part 1 in the FEIS shows the total road miles open to motorized travel under each of the alternatives analyzed. Even under the most restrictive alternative, there will be in excess of 1,676 miles of roadway open to motorized travel on the forest. In addition to this mileage, many of the more popular routes, such as Lincoln Creek, Independence Pass and Taylor Pass on the Aspen Ranger District, are open county roadways within the forest and are not included in our analysis. Public comment will be considered, along with all of the other factors, in the 2002 Forest Plan.

R90 Public Concern: The Forest Service should ensure road access to all proposed wilderness areas.

Response: Road access near proposed Wilderness will depend on the existing road system and decisions made in the Travel Management Plan. These areas were proposed as Wilderness largely because they do not have roads. By law, motorized access or any other activity that may degrade future Wilderness values, is not allowed in areas proposed

for Wilderness in the 2002 Forest Plan. Public input will be considered in making a final decision on which roads to leave open to motorized use in the Travel Management Plan.

R91 Public Concern: The Forest Service should improve winter access to wilderness areas for backcountry skiing.

Response: Improvements in winter access for backcountry skiing are largely determined by the availability of physical and financial resources. The Forest does not, under current budget levels, have the financial resources to plow roadways and parking areas, nor to pay other entities to do so. It is projected that this situation will not change in the short term. In reality, even some of our partners have backed off of what they are willing to plow in winter, which is the case for Four Mile Park on the Sopris District. Issues of budget and priority setting are beyond the scope of this forest planning process.

R92 Public Concern: The Forest Service should identify off-trail closures and restriction areas by physical characteristics.

Response: Enforcement of off-trail restrictions is primarily a budget driven issue and generally outside the scope of forest planning to control. However, management boundary lines were drawn to correspond to natural land features and other easily identifiable features to the extent possible for easier on-the-ground identification. It is not always possible to use easily defined boundaries and at the same time meet the resource management objectives of a particular area. In these cases, the forest will use education and engineering to assist the public in understanding the travel management in a particular area.

R93 Public Concern: White River National Forest should retain the East and West Maroon trails access through the Elk Mountains.

Response: The East and West Maroon Trails will be retained through the Elk Mountains. The removal of these from the list of Forest Service system trails was discovered to be a mapping error in the development of Alternative D in the DEIS. With this correction, there is no alternative proposed that removes either of these trails as a system trail.

R94 Public Concern: White River National Forest should create a trailhead and access from Silverthorne into the Eagles Nest Wilderness.

Response: The White River National Forest currently has trailhead access from Silverthorne into the Eagles Nest Wilderness. Access points into the Wilderness are at South Willow, Mesa Cortina and at the end of Ryan Gulch Road. All six proposed alternatives in the DEIS have each of these access points open to foot and horse travel.

R95 Public Concern: White River National Forest should institute a reservation system for public land access.

Response: The decision to implement a reservation system for uses on National Forest System lands on the forest is separate from the land allocation decisions made in a forest plan and not within the scope of this analysis. We currently have reservation systems in place for some of the privately provided recreational opportunities, such as the three hut systems, on the forest. Many of our more popular campgrounds have gone to a reservation system because of demand. The addition of any future reservation systems will be done through a site-specific analysis.

R96 Public Concern: The 2002 Forest Plan should limit the size of hiking and camping groups.

Response: The Forest Service uses a couple of different tools to consider human recreational impact. The first tool is the Recreation Opportunity Spectrum. This gives an area designation to each acre on the Forest and with the designation comes specific guidance on what level or development is permissible to be in harmony with the surrounding environment. The second tool is the Scenery Management System. This analysis tool also ensures any development will fit into the landscape. There are some areas that have limits on camping groups.

Hunting

R97 Public Concern: The Forest Service should stagger hunting closures.

Response: Hunting units and dates are set by the State of Colorado. In an 1896 Supreme Court case, Geer *v.* Connecticut, the Supreme Court ruled wildlife was the property of the state in which it was found. Thus, in the creation of the National Forests, control of the wildlife resources was reserved to the States. State wildlife issues are outside the scope of this analysis process.

R98 Public Concern: White River National Forest should maximize recreation visitor days for big game hunting.

Response: Of the six alternatives analyzed in the FEIS, recreation visitor days for big game hunting are highest in Alternative F, which increases motorized access into hunting areas. However, the hunting success rate in Alternative F will be among the lowest due to animal disturbance by motorized vehicles. Public comment will be considered, along with other factors, in developing management strategies in the 2002 Forest Plan and Travel Management Plan.

Enforcement

R99 Public Concern: The Forest Service should adopt meaningful penalties for illegal access by motorized or mechanized means.

Response: Penalties for law and regulation violations, such as illegal access, are set by the US Courts or by Congress in legislation creating the law. The Forest Service only has the authority to recommend changes to the collateral forfeiture schedule for misdemeanor violations. Actions of the US Court system and Congress are outside the scope of this forest planning process.

Recreation Conflicts with Other Management Activities

R100 Public Concern: White River National Forest should prohibit activities that damage recreational values.

Response: The Multiple-Use Sustained-Yield Act of 1960 clearly states, "It is the policy of the Congress that the National Forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Further, the Mining Law of 1872 states that all valuable mineral deposits in lands belonging to the United States "are hereby declared to be free and open to exploration" … "by citizens of the United States". As defined by Congress, recreation is only one of many valid uses of

National Forest System lands and the Forest Service does not have the authority to only manage for recreational values.

R101 Public Concern: Extractive activities should be prohibited in non-motorized backcountry recreation areas.

Response: It is not within the legal scope of this plan to prohibit all extractive activities in non-motorized backcountry recreation areas. The Mining Law of 1872 supercedes the forest plan.

R102 Public Concern: Mitigation for the effects of vegetation management on the quality of recreational experience should be addressed in the FEIS.

Response: Mitigation was done in the final forest plan to reduce the effects of vegetation management on recreation. Management areas 1.31, 1.32, 1.41, 2.1, 3.1, 3.21, 3.31, 3.32, 3.4, 3.55, 4.2, 4.23, 4.3, 4.32, 8.21, and 8.25 are all primarily for recreation. Timber harvest is allowed only to protect or enhance values related to recreation and does not contribute to the ASQ. Therefore, there is no incentive to do the timber harvest for other than recreation values.

R103 Public Concern: The White River National Forest Plan should use passive forest management strategies where active management compromises visual and recreational goals.

Response: The Forest Service tries to use the management strategy that best fits several goals, including visual and recreational integrity, on projects. The Recreation Opportunity Spectrum divides the forest into areas with specific direction on levels of recreation development, vegetative alteration, visual goals and travel management allowed for management of the area. Additionally, each proposed project must be evaluated under the Scenery Management System to ensure the proposed action blends into the landscape.

Developed Recreation and Camping

R104 Public Concern: The Forest Service should add a vegetation management guideline for developed recreation.

Response: The decision to construct any new developed recreation on the Forest will be done following a site-specific analysis separate from this forest plan analysis. A component of the future analysis should include the effects of that new development on the vegetation and ecological systems of the area.

R105 Public Concern: The Forest Service should limit developed recreation improvements to maintenance of existing facilities.

Response: This option was considered. Alternative I analyzes no increase in developed recreation facilities over existing levels. Public comment will be considered, along with other factors in developing the area management strategies for the 2002 Forest Plan. Maintenance of existing facilities is determined by budget and outside the scope of this forest planning process.

R106 Public Concern: Developed recreation should be prohibited under Management Area prescriptions 1.31 and 1.32.

Response: Developed recreation is prohibited in Management Areas 1.31 and 1.32. The management area descriptions in the 2002 Forest Plan state that road building is not allowed. Without road building, developed recreation sites are not possible.

R107 Public Concern: The Forest Service should provide adequate facilities to physically disabled persons.

Response: The Architectural Barriers Act of 1968 requires that federal agencies provide access to persons with physical disabilities in our buildings and facilities. Facility design is a legal mandate and not a decision that can be made in the forest planning process.

R108 Public Concern: White River National Forest should develop new campgrounds.

Response: The construction of new campgrounds is analyzed and discussed in Chapter 3, Topic 3, Part 1 of the FEIS. The discussion in the FEIS notes that any new development will have to come from private industry building and maintaining these facilities. The actual analysis needed for the development of these sites and how to fund them is outside the scope of this forest planning process.

R109 Public Concern: The Forest Service should locate new campgrounds away from wilderness and roadless areas.

Response: The decision to construct any new campground on the forest will be made following a site-specific analysis separate from this forest plan analysis. Any future analysis should include the effects of that new development on the surrounding areas including Wilderness and roadless areas.

R110 Public Concern: The Forest Service should consider installing high-density camping facilities.

Response: The decision to construct any new campground on the forest will be done following a site-specific analysis separate from this forest planning analysis. Any future analysis should include the benefits of high-density camping units for the area.

R111 Public Concern: The Forest Service should restrict campground access to vehicles less than 22 feet in length.

Response: Restricting campground access to a particular user group such as motorized vehicles less than 22 feet in length is a site-specific decision and not within the scope of this forest planning process.

R112 Public Concern: The Forest Service should ensure that concession-operated campgrounds allocate the majority of space for tent campers.

Response: Concessionaires operating Forest Service campgrounds have very little control, in most cases, over whether a tent or recreational vehicle occupies a site. Many Forest campsites are reserved through a national reservation system on a first-come first-served basis. This system only inquires about the type of equipment a camper may have if the site is "tent only" or otherwise too small for a recreational vehicle. The real limitation is the type of use the site can physically handle. Most Forest campgrounds were designed and constructed in the early 1960s when tent camping was dominant. Allocation of

campground space for recreational vehicles versus tents is a site-specific issue made at the time of campground design and is outside the scope of this forest planning process.

R113 Public Concern: The Forest Service should allow dispersed vehicle camping in appropriate areas.

Response: All management strategies in the 2002 Forest Plan allow the continuation of dispersed vehicle camping in many Forest areas. Public comment will be considered, along with other factors, in developing the area management strategies in the 2002 Forest Plan.

R114 Public Concern: The Forest Service should consider reopening the Maroon Lake campground.

Response: The Maroon Lake Campground was closed because mudflows coming off Sievers Mountain posed a threat to public safety—a mudflow in 1986 wiped out several campground units. Fortunately, the flow occurred during the day, only damaging personal property. The campground was closed to use in 1996 following a geotechnical report on the mudflow hazard. A similar mudflow occurred one night in the summer of 1999. The likelihood of serious personal injury would have been high if the campground had still been open. The few sites that still have not been revegetated are in the high to moderate hazard areas. There are no plans to allow future public camping in this area.

The Forest agrees that more developed camping needs to be provided on the Aspen District to make up for the loss of this campground; however, this is a site-specific issue and is outside the scope of this forest planning process.

Management Area Designations/Prescriptions

R115 Public Concern: The Forest Service should not change designation of areas currently identified as non-motorized.

Response: Areas currently designated as non-motorized in the current Forest Plan will remain so in Alternative B of the FEIS. The management strategies in Alternative B, as well as all other alternatives, will be considered along with public input in formulating the 2002 Forest Plan and FEIS.

R116 Public Concern: The Forest Service should apply Management Area 1.2 to the McCoy Park/ Mud Springs areas.

Response: The McCoy Park/Mud Springs area is analyzed as Management Area 1.2 in Alternative I. Public comment on this issue will be considered along with other factors in making a final decision in the 2002 Forest Plan.

R117 Public Concern: On White River National Forest, a number of areas should be designated as Management Area 1.31.

R117.1 Battlements

R117.2 Coal Basin

R117.3 Guller Gulch

Response: Numerous areas were looked at for inclusion into Management Area 1.31 in all alternatives, especially in Alternatives D and I. Spruce Creek, Galler Gulch and Copper Mountain to Shrine Pass were analyzed in Alternative I; and Jones Gulch was

analyzed as Management Area 1.31 in Alternative D. The area immediately around all of the ski huts is too small of a land base to attempt to manage through the land allocation process in a forest plan. Each of these sites is currently covered by a Forest Supervisor's special closure order or another closure means as a site-specific decision. Public comments on this issue will be considered in the FEIS and 2002 Forest Plan.

R118 Public Concern: The Forest Service should change management designations in the Ten Mile Range from 2.1.

Response: Different alternatives for the management designations were analyzed for the Ten Mile Range in the six alternatives in the DEIS. In Alternative B, the area along the top of the Ten Mile Range outside Management Area 8.25 was analyzed as Management Area 1.31. Portions of the same area were analyzed as Management Area 1.31 in Alternatives C, E and I. In Alternative F, the area was analyzed as Management Area 5.4, which may allow recreation uses similar to those found in Management Area 1.31. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R119 Public Concern: The Forest Service should designate the Cucumber Gulch area as Management Area prescription 2.1.

Response: Mangement area prescription land allocations differ in each alternative. These allocations came about through specialists' input and public comments and reponses.

R120 Public Concern: The Forest Service should designate Mount Baldy and Boreas Pass as Management Area 3.21.

Response: The area around Mount Baldy and Boreas Pass is designated as Management Area 3.21 (limited use areas) in Alternative D. Public comment will be considered in making a final decision on which management area designation to use for this area in the 2002 Forest Plan.

R121 Public Concern: The Forest Service should change management designations for the Upper Blue River Basin from 3.31 to 4.3.

Response: The Forest Service has addressed management designations for the Upper Blue Basin in the six alternatives in the DEIS. The management area designated in Alternative I as 3.31 for the Upper Blue Basin was analyzed, as Management Area 4.3 in Alternative B. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R122 Public Concern: White River National Forest should implement the Management Area 3.32 in Alternative C for the trailhead area on Snowmass Creek.

Response: The backcountry recreation designation in Alternative C, along with the designations proposed in all of the other alternatives will still be considered in the 2002 Forest Plan and FEIS. Public comment on the management designations will also be one of the factors used to determine the final management strategy.

R123 Public Concern: The Montezuma Area should be designated as management area 4.3.

Response: Under Alternative I in the DEIS, the primary emphasis of the Montezuma area was dispersed recreation—Management Area 4.3. Components of all the alternatives analyzed, as well as public input, will be considered in the 2002 Forest Plan and FEIS.

R124 Public Concern: The Final White River National Forest Plan should designate a 4.3 management prescription for Spruce Creek/Crystal Creek.

Response: The Spruce Creek and Crystal Creek areas were analyzed as Management Area 4.3 in Alternatives B, C, D, E and I. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R125 Public Concern: The Ruedi area should be designated Management Area 4.32.

Response: Under Alternative F in the DEIS, the primary emphasis of the Ruedi area was dispersed recreation in high-use areas—Management Area 4.32. Components of all the alternatives analyzed, as well as public input, will be considered in the 2002 Forest Plan and FEIS.

R126 Public Concern: The Forest Service should change areas currently designated as Management Area 5.45 to 1.32 or 3.21.

Response: Many of the areas designated as Management Area 5.45 (forest carnivores) in Alternative D were analyzed as Management Areas 1.32 (backcountry recreation, non-motorized with limited winter motorized) and 3.21 (limited use areas) in other alternatives. In Alternative B, there are not any areas designated as Management Area 5.45 in all of Summit County—only one area on the entire Forest is designated as Management Area 5.45 in this alternative. The primary public concern with designating areas as Management Area 5.45 is new snow compaction. All existing backcountry hut routes and snow play areas are mapped as compacted areas. No significant change in winter non-motorized management is expected in these areas by designating them as Management Area 5.45.

The listing of the lynx as a threatened species by the US Fish and Wildlife Service and any associated standards and guidelines will be followed on all suitable lynx habitat areas of the forest regardless of management area designation as required by the Endangered Species Act. Public comment will be considered in making a final decision on which management area designation to use for these areas in the 2002 Forest Plan.

R127 Public Concern: The Forest Service should change areas north of Keystone from 5.45 to other designations.

Response: Alternatives C, E and F analyze the area to the north and northeast of the Keystone Ski Area as Management Area 1.31.

R128 Public Concern: The Forest Service should retain the existing management prescription for the Peninsula.

Response: Alternative B analyzed keeping the existing management in place for the Peninsula area of Lake Dillon, as well as for the rest of the forest. Public comment will be considered in making a final decision on which management area designation to use for these areas in the 2002 Forest Plan.

R129 Public Concern: The Forest Service should address management designations for Vail.

Response: Several different alternatives for management area designations were analyzed in the six alternatives in the DEIS. The lands between the area designated as Management Area 5.41 in Alternative B and the western boundary of Management Area 8.25 were analyzed as Management Area 1.31 in Alternative C. The area on the northeast edge of the Vail Ski Area to the East Vail Chutes was analyzed as Management Area 1.31 in Alternatives C, E and F. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R130 Public Concern: White River Forest Plan guidelines should be revised to clarify that they do not apply to Management Area 8.25.

Response: The LRMP guidelines for scenery will continue to apply to all lands on the Forest. The capacity levels listed in Table 2-9 in the DEIS are not used to calculate ski area capacities because capacity calculation on ski areas is done through other means on a more site specific basis. The scenery management system guidelines do not change across the Forest no matter the activity.

R131 Public Concern: The dispersed recreation designation for upper Crystal Valley should be modified to accommodate additional backcountry recreation.

Response: None of the proposed alternatives limits the amount of backcountry recreation in the upper Crystal Valley. Much of the area is designated Wilderness—a land allocation that may not be changed in a forest plan. The only limitations placed on recreation in the upper Crystal Valley are where mountain bikes and motorized travel are permitted. Public input and other factors will be considered in the FEIS and 2002 Forest Plan.

R132 Public Concern: The Forest Service should revise the management strategy for the Vail Pass area.

Response: The Vail Pass Management Plan, not the forest planning process, guides the site-specific management strategy for the Vail Pass area. However, the area allocation for uses is a part of this process, and in Alternative C of the FEIS, the top of Vail Pass is designated as Management Area 3.32, which allows designated snowmobile routes and play areas. Management Area 3.2 meets the same intent as Management Area 5.4 or 5.43 as far as winter travel and recreation. Public comments on this issue will be considered in the FEIS and 2002 Forest Plan.

R133 Public Concern: In the absence of Forest Service financial assistance for trailhead improvements, the area around the Town of Montezuma should not be designated high use recreation.

Response: In Alternatives B, C, E, F and I of the DEIS, the area around the Town of Montezuma is analyzed as Management Area, dispersed recreation. This management strategy involves less intensive recreation management and development than some other strategies. Public input on the management area designation around the Town of Montezuma will be considered with several other factors in preparing the 2002 Forest Plan. Funding trailhead improvements is a function of budget allocation. Budget allocation and priority is outside the scope of this analysis.

R134 Public Concern: The Forest Service should modify the dispersed recreation management area designation for the Upper Crystal River Valley.

Response: Alternative F of the DEIS analyzes the Upper Crystal River Valley as Management Area 3.31(backcountry recreation, year-round motorized). This designation carries with it a lesser degree of use and development than Management Area 4.3 (dispersed recreation). Public comment on this issue will be considered along with other factors in making a final decision in the 2002 Forest Plan.

R135 Public Concern: The Forest Service should keep Four Mile Park open.

Response: Four Mile Park is not closed to human use in any of the proposed alternatives in the DEIS; however, there are differing restrictions proposed for different modes of travel in the six alternatives. A final decision will be based on several factors, including public comment on the DEIS.

R136 Public Concern: The FEIS should address management of Independence Pass.

Response: The management of the Independence Pass corridor is addressed in all six proposed alternatives in the DEIS. A final decision on the recreation management along the corridor will be made in the 2002 Forest Plan. Implementation of any management actions will be budget-driven. Levels of budget allocation and budget priorities are outside the scope of this forest planning process.

R137 Public Concern: Ptarmigan Pass should remain open for winter recreation.

Response: To reach Ptarmigan Pass, you must travel through the Ptarmigan Peak Wilderness. The Wilderness Act of 1964 prohibits motorized use in congressionally designated Wilderness. All alternatives analyzed in the FEIS continue to allow snowshoeing and cross country skiing in this area.

R138 Public Concern: The Forest Service should change the designation of Ski Cooper and Chicago Ridge Snowcat Area to B, permitted motorized travel only.

Response: In the Preferred Alternative (Alternative K) the west side of Chicago Ridge, where the snowcat operation exists, is designated management area 1.32—Backcountry recreation-non-motorized with limited winter motorized. This designation is most appropriate for the desired condition and type of use occurring in the area. Winter motorized travel will be restricted to designated routes and play areas only.

Special Use Permits (Not Ski Areas)

R139 Public Concern: The Forest Service should expand the number of outfitter permits.

Response: The distribution of commercial special-use permits by the Forest Service is done under regulations and policy in the Forest Service Handbook (FSH) 2709.11. The Forest must follow these guide lines in administering existing permits and issuing any new permits. Changing these procedures is a national issue and outside the scope of this forest planning analysis.

R140 Public Concern: The Forest Service should foster outfitter and guide businesses offering more primitive experiences.

Response: Several factors are looked at before outfitter and guide permits are issued, including demonstrated public need, availability of capacity, compliance with Forest goals and objectives, environmental stewardship and economic viability. The designation of more areas for primitive recreation would provide the additional capacity for new outfitter and guides offering more primitive experiences. The actual process for issuing new permits is done on a site-specific basis and is outside the scope of this forest planning process.

R141 Public Concern: The Forest Service should implement a permit system if capacity exceeds 80 percent.

Response: A permit system is one of many management tools available to the Forest Service should wilderness use near the set capacity levels. This will be a site specific decision requiring separate analysis and is outside the scope of this planning process.

R142 Public Concern: White River National Forest should continue to renew outfitter permits.

Response: The renewal of outfitter/guide permits on the forest is done under regulations and policy in the Forest Service Handbook (FSH) 2709.11. The Forest must follow these guidelines in administering existing permits and issuing any new permits. Renewal of an individual permit is a site-specific decision made at the time the previous permit expires and does not come under the scope of this forest planning analysis.

R143 Public Concern: The Forest Service should consider special use permits that require resource maintenance plans.

Response: Special use permit administration is done under regulations and policy in the Forest Service Handbook (FSH) 2709.11. The Forest must follow these guidelines in administering existing permits and issuing any new permits. In some cases, special clauses are added to a permit that addresses resource management issues. In priority-use permits, annual operating plans may address resource issues. The administration of special use permits is outside the scope of this forest planning analysis.

R144 Public Concern: The Forest Service should enforce spatial separations between outfitter camps.

Response: The Forest Service does have a proposed guideline in Management Area 1.12 (recommended Wilderness) that separates outfitter/guide camps by three-quarters of a mile. Enforcement of this guideline will be done in annual operating plans for each permit when designated campsites are approved or denied. Public comment will be considered, along with other factors, in developing the area management strategies for the 2002 Forest Plan.

R145 Public Concern: The Forest Service should not allow individuals or businesses to reserve campsites.

Response: Individuals or businesses are allowed to reserve campsites on the forest under very limited circumstances. Developed recreation sites (campgrounds) may be reserved through a national reservations center, similar to making a motel reservation. Aside from campgrounds, a signed special use permit is required to reserve a camping location on the

forest. Following are examples of why these special-use authorizations may be given out: a permittee needs to be near their operation; a volunteer group needs to be near their work site for logistical reasons; or another agency, such as the military, is holding exercises for training. The most common example of reserved campsites would be for the operation of a commercial special use permit. To make a commercial operation viable, the owner must have some assurance of the availability of a certain site or area for their operations. In most cases, they must also be able to set up operations in advance or exceed the standard camping limit on the forest. Reserved sites for outfitter/guides are given according to guidelines in the Forest Service Handbook (FSH) 2709.11. Other than the immediate area around the campsite, these are non-exclusive use permits and other private parties may share the same area. The issue of reserved campsites is not a part of the forest planning analysis.

R146 Public Concern: Conflicts between Objective 2.9b and permit administration guidelines in the Draft EIS should be resolved in the FEIS.

Response: A conflict appears to exist between Objective 2.9b on page 1-8 of the draft forest plan and the permit administration discussion on page 3-288 of the DEIS because of budget levels. Objective 2.9b in the draft plan assumes that we will get enough money in the future to do the necessary administration to meet this objective. The discussion on page 3-288 of the DEIS addressed our capability to do permit administration under current budget levels.

R147 Public Concern: Public access to wildlife recreational activities should take precedence over commercial enterprises.

Response: All access to wildlife recreational activities on the forest is for public use. The commercial operations on the forest are merely providing assistance to members of the public in the pursuit of the wildlife. The hunter/fisherperson is the individual who must have in their possession a state license and be physically present, taking an active role on the forest in the pursuit of the game. This is in contrast to true commercial enterprise that has the sole purpose of harvesting wildlife in a location and offering that wildlife for sale with no participation from the purchaser. Additionally, outfitter/guides on the forest offer valuable training to their clients on land use and ethics. Many persons would not experience or enjoy hunting and fishing on the forest without the outfitter/guides. The allocation of use is a site-specific decision and not a part of the forest planning process.

R148 Public Concern: White River National Forest should provide administrative guidelines for concessionaire management.

Response: A national policy is currently being developed to provide administrative guidelines for concessionaire management. This includes direction on when this type of management is most appropriate for developed sites. When completed, the new policy will guide concessionaire management on the forest.

R149 Public Concern: The Forest Service should require concessionaires to maintain permit sites and surroundings.

Response: Concessionaire permits for the operation of developed sites on the forest include requirements for maintenance of specific sites and their surroundings. Compliance monitoring of permit requirements is subject to budget limitations and

conducted on a site-specific basis. Individual operating plan requirements and related budget allocation decisions are outside the scope of this forest planning process.

R150 Public Concern: White River National Forest should terminate all recreational cabin leases.

Response: All recreational cabin permits on the forest have termination dates. Prior to the date of termination, a separate NEPA analysis will be completed to decide if the use should be continued. Public comments will then be considered in making a final decision. Termination of recreation special use permits is outside the scope of this forest planning process.

R151 Public Concern: The 2002 Forest Plan should allow future expansion of the hut system.

Response: Alternatives B, C, E and F allow the construction of additional backcountry huts, such as those in the 10th Mountain Division Hut Association system. Public comment on this issue will be considered along with other factors in making a final decision in the 2002 Forest Plan.

R152 Public Concern: The Forest Service should limit new hut permits.

Response: Alternatives D and I analyzed limiting or eliminating the potential for any new backcountry huts on the Forest. Public comment on this issue will be considered along with other factors in making a final decision in the forest plan.

R153 Public Concern: The Forest Service should prioritize environmental values over expansion of the hut system.

Response: Any expansion of the hut system will need to be a site-specific decision following completion of the 2002 Forest Plan and is not addressed in this forest planning process. In the analysis of a new hut proposal, additional public comment will be received and analysis will need to be done on the effects a new hut would have on environmental values.

R154 Public Concern: The Forest Service should monitor summer use of huts.

Response: The Forest Service monitors summer use of backcountry huts. The level of monitoring is dependent on the annual allocation of limited recreation staff, funding and priorities determined in an annual program of work. Annual budgeting and staffing decisions are outside the scope of this forest plan analysis.

R155 Public Concern: The Forest Service should limit commercial use in Woody Creek.

Response: The determination on whether commercial use should be allowed in the Woody Creek area will be done following a site-specific analysis. This analysis will include a public involvement process separate from this forest planning process. Site-specific analysis is outside the scope of this land allocation planning process.

R156 Public Concern: The 2002 Forest Plan should bar commercial recreation in Coal Basin.

Response: The determination on whether commercial use should be allowed in the Coal Basin area will be done following a site-specific analysis. This analysis will include a

public involvement process separate from this forest planning process. Site-specific analysis is outside the scope of this land allocation planning process.

R157 Public Concern: The White River National Forest Plan should deny a special use permit for Western Adventures Outfitters.

Response: The decision on whether to allow commercial operations by Western Adventure Outfitters on the forest is a site-specific decision made at the District level following a site-specific analysis. This analysis will include a public involvement process separate from this forest planning process. Site-specific analysis is outside the scope of this land allocation planning process.

R158 Public Concern: The Forest Service should designate user-day allowances for dogsleds.

Response: The decision to allow commercial dogsledding use on any part of the forest will be a site-specific decision and not within the scope of this forest planning process. In general, the decision to allow new, or expanded, commercial use opportunities follows a capacity analysis and determination of public need. If capacity is available and need determined, a competitive prospectus process follows.

R159 Public Concern: White River National Forest should enforce commercial stable permits.

Response: Enforcement of commercial stable permit conditions and all other commercial operations on the forest comes under policy outlined in Forest Service Handbook (FSH) 2709.11. The level of enforcement and monitoring is determined by yearly Forest priorities and budgeting. Both of these issues are outside the scope of this forest planning analysis.

R160 The Forest Service should not allow commercial stable operations on the Colorado Trail.

Response: Commercial operations existed on this trail prior to the route being designated as the Colorado Trail. The decision on whether to allow commercial stable operations on the Colorado Trail is a site-specific decision made at the District level following a site-specific analysis. This analysis will include a public involvement process separate from this forest planning process. Site-specific analysis is outside the scope of this land allocation planning process.

R161 Public Concern: The Forest Service should require commercial stable operators to collaborate with local trail users to identify restricted trails.

Response: Requirements placed on commercial stable operators and other recreation special use permittees are done either through the permit or in an annual operating plan that accompanies a long-term permit. The requirements placed on permittees are site-specific decisions. Site-specific analysis is outside the scope of this land allocation planning process.

R162 Public Concern: The Forest Service should not issue new commercial stable operating permits.

Response: The decision on whether to allow commercial stable operating permits on the forest is a site-specific decision made at the District level following a site-specific

analysis. This analysis will include a public involvement process separate from this forest planning process. Site-specific analysis is outside the scope of this land allocation planning process.

R163 Public Concern: The Forest Service should require permits for recreational mining.

Response: The Forest Service does require permits for dredging minerals when the operation has potential to cause damage to Forest resources. Low-impact recreational panning does not require a permit. Whether a permit is necessary for a recreational activity on the forest is restricted is a matter decided by relevant law and regulation and is outside the scope of this planning document.

Recreation Use Interaction/User Conflicts

R164 Public Concern: The Forest Service should promote resource sharing among users.

Response: The Forest Service promotes resource sharing among users. The Forest tries to educate various recreation user groups to coexist with each other. There are, however, experiences that recreationists are seeking on the forest that are sometimes incompatible. The Forest Service must then make a management determination on which use will take place in a particular area and impose regulations accordingly. Public comment will be considered, along with other factors, in developing the area management strategies in the 2002 Forest Plan and in the Travel Management Plan.

R165 Public Concern: White River National Forest should follow agency policy regarding shared trail use.

Response: The Forest follows agency policy regarding shared trail use. For example, in Appendix O of the FEIS, across all alternatives, there are only five trail segments (out of 43 trails) on the Aspen District identifying any proposed differences among non-motorized users on the Forest Development Trail system where the reason for the difference is not due to Wilderness designation or potential Wilderness designation. Further, two of these restrictions are on trail segments only a few hundred yards in length where the primary use is walking and wheelchair use. Similar situations can be found on the other Districts and across all alternatives.

R166 Public Concern: The Forest Service should research programs that successfully manage multiple use recreation.

Response: The Forest Service researches programs that use techniques to successfully manage multiple-use recreation. In developing recreation management strategies, especially on site-specific decisions, much research goes into the final proposed strategies. An example of this effort on the forest would be in the development of the Vail Pass Management Plan to address winter recreation concerns in the Vail Pass area. Because of the success of this plan, another District on the forest actually had persons on the Vail development committee assist with a plan elsewhere.

R167 Public Concern: The Forest Service should separate recreation activities.

R167.1 Motorized and Non-motorized

R167.2 Mechanized and Pedestrian

R167.3 Equestrian and Motorized

R167.4 General Winter Activities

R167.5 At Shrine Pass

R167.6 At McClure Pass

R167.7 At Thompson Creek/Fourmile

R176.8 At Chicago Ridge/Jones Gulch

R167.9 At Montezuma

R167.10 At Basalt Mountain

Response: It is not possible to separate all recreational activities. The Forest has a limited land base and there is not enough available area for each recreational use to have their own area. Additionally, many of the recreation uses are dependent on each other. It does little good to have a developed camping site without access to adjacent recreational opportunities, or have winter cross-country skiing if the plowed trailhead access for it is so far from the skiing area that the skiing time is spent in getting to and from the area. Yet, the same trailhead may also be needed to access snowmobiling. The separation of uses is one tool we will use when other methods such as user education fail. Public comment on separating uses will be considered, along with other factors, in developing the area management strategies in the 2002 Forest Plan and in the Travel Management Plan.

R168 Public Concern: The Forest Service should use topographic features as boundaries between areas of snowmobiling and skiing.

Response: Where there is actual separation of uses proposed in the FEIS, and it is practical, the Forest has used topographic boundaries as one of the methods employed to separate these uses. In other areas, we have used designated routes and/or changes from open meadows to trees to give clear indications of boundaries.

R169 Public Concern: The Forest Service should define "conflicts with other users."

Response: The Forest looks at "conflicts with other users/uses" as any activity on the forest that has measurable or perceived negative effects on a physical resource or the experience of another Forest use or user. For a conflict to exist, there does not necessarily have to be a scientifically measurable negative effect. Instead, conflict may exist in personal feelings. What may be a conflict to one person may not be in conflict to another. Perceived conflict sometimes gets to people's beliefs and values and how they apply these in their experience on the forest. In recreation management, we are essentially providing an "experience." Thus, we need to consider factors, other than hard scientific data along with the scientific evidence. This is one of the difficulties in balancing recreation needs on the forest and an area where public input is helpful.

R170 Public Concern: The Forest Service should manage recreation to reduce incidences of user conflict.

Response: The Forest Service attempts to lower the chances for user conflict where possible. The Forest looks at "conflicts with other users/uses" as any activity on the forest that has measurable or perceived negative effects on a physical resource or the experience of another Forest use or user. For a conflict to exist, there does not necessarily have to be a scientifically measurable negative effect. Instead, conflict may exist in personal feelings. What may be a conflict to one person may not be in conflict to another. Perceived conflict sometimes gets to peoples beliefs and values and how they apply these in their experience on the forest. In recreation management, we are essentially providing an "experience." Thus, we need to consider factors, other than hard scientific data along with the scientific evidence. This is one of the difficulties in balancing recreation needs on the forest and an area where public input is helpful.

R171 Public Concern: The Forest Service should employ techniques for resolving user conflict that do not involve closures.

Response: The Forest Service employs techniques to resolve user conflicts that do not involve closures. One technique uses education to try to get one user group to respect and understand the needs of the other users. The Forest Service involvement in programs such as Tread Lightly and Leave No Trace are examples of this. Another successful technique is working with multiple interest citizens groups and local governments on management issues. A third technique is separation of uses when practical. Closures to certain uses will continue to be a viable management tool to address user conflicts. The analysis on closures for specific uses is done through the Recreation Opportunity Spectrum allocations in the 2002 Forest Plan and in the Travel Management Plan. Public comment will be considered, along with other factors, in developing the area management strategies in the 2002 Forest Plan and in the Travel Management Plan.

R172 Public Concern: The FEIS should address conflicts between non-motorized backcountry users and snowmobilers.

Response: The Forest is attempting to address conflicts between non-motorized backcountry users and snowmobilers. The White River's 2002 Forest Plan will be the first forest plan in the nation to look at separate recreation plans for the summer and winter. In all other forest plans, including the current White River Forest Plan, minor adaptations are made to the summer plan for winter use. One-half of the Recreation Opportunity Spectrum allocations identified in the FEIS are specific to winter. All of the alternatives analyzed have mixed use, motorized and non-motorized areas at varying levels. Other strategies that address conflicts include separation of uses and education.

R173 Public Concern: The Forest Service should strictly apply guidance found at Code of Federal Regulations (36 CFR 295) regarding the mitigation of conflict.

Response: The Forest Service follows 36 CFR 295 to mitigate conflicts with motorized use off of Forest Development Roads. The Forest Service follows the National Environmental Policy Act by completing an environmental analysis before allowing any off-road use. Most often, this is done in through the forest planning process. At other times, the analysis may be site specific, such as in a Travel Management Plan that specifically addresses motorized use on trails. 36 CFR 295 allows us to determine

whether the off-road use is causing considerable adverse effects before the use is stopped. The Forest has implemented closures to off-road motorized use and provided enforcement when necessary.

Adequacy of Analysis

R174 Public Concern: The White River National Forest Plan should include additional evaluation of resource areas that support Recreational Motorized opportunities.

Response: Motorized uses were evaluated separately in the FEIS. Calculations were done separately for OHV, motorcycle, auto travel and snowmobile use demands. Analysis also compares capacities for motorized recreation vs. non-motorized recreation (see Figure 3-22, 3-25, and 3-26).

R175 Public Concern: The Forest Service should explain how they tied recreational capacities to recreational demand in the FEIS.

Response: The FEIS ties projected recreation demand to theoretical and practical capacities throughout the document. The FEIS recognizes that demand will exceed practical capacity for many of the more popular forms of recreation on the forest. By 2020 demand is projected to be 147 percent of practical developed recreation capacity on the forest. This same analysis is used for dispersed recreation use on in the FEIS.

R176 Include Travel Management Plan And Existing Infrastructure In Use Estimates

Response: The existing infrastructure for developed recreation sites is included in determining use estimates where practical. This information is most helpful where the activity is facility dependent, such as huts, ski areas and campgrounds. The Travel Management Plan is a draft document and will not be completed until a final decision has been made on the 2002 Forest Plan. Decisions in the Travel Management Plan are site specific and must be consistent with forest plan direction. Differing levels of travel management strategies are analyzed in the 2002 Forest Plan, but not at the site-specific level.

Future actual use should not be confused with demand in this analysis. The analysis in the FEIS attempts to predict demand based on trend research and past-use levels. The document compares the projected demand to capacity (supply). The FEIS recognizes that demand will exceed practical capacity for many of the more popular forms of recreation on the forest. By 2020 demand is projected to be 147 percent of practical developed recreation capacity on the forest. This same analysis is done for dispersed recreation.

Some of the uses more heavily restricted on the forest may reach practical capacity sooner than others even though there may be more demand than supply (for example, the backcountry hut system and developed campgrounds). Changes in technology over the life of a forest plan may displace some forms of recreation by sharing the same resource needs—the development of mountain bikes, ATVs and new snowmobiles are examples of this.

Continued growth on private lands within the area covered by the forest will be a factor in determining demand on the forest. What values and recreational desires are people going to bring with them when they arrive in the region? How are society's values going

to change in the future? Hunting and related uses have declined, while other uses, such as viewing wildlife, continue to climb. Marketing campaigns for certain products are capable of creating demand where little, or none, existed before. Many of these issues are outlined in Chapter 3, Topic 3, Part 1 and were factored into the future trends research done by Cordell.

R177 Public Concern: White River National Forest should clarify the methodology used to identify recreation carrying capacity.

Response: There is not a single methodology to identify recreation carrying capacity that fits the varied management situations on the forest. To get more accurate carrying capacity estimates, we must look at several different strategies that have been proven to be effective on a national level.

Capacity calculations are based on direction in the Region 2 Desk Guide. These methodologies are documented in "Recreation Opportunity Spectrum and Carrying Capacity Process Documentation Paper, 1998." This document is available for review in the 2002 Forest Plan administrative record at the Forest Supervisor's Office.

R178 Public Concern: Motorized recreation use capacities should be calculated based on acres within a recreation opportunity spectrum class instead of miles of travelways.

Response: The recreation opportunity spectrum (ROS) class is an indicator of many management strategies and desired outcomes within a particular land area. Motorized recreational use is only one of the management activities guided by ROS. One of the desired outcomes is to meet the expected recreational experience of the user in a particular area.

Use capacity level calculation methods are specific to the individual use to provide the best information in management decisions. In some cases, such as where snowmobiles can travel off road/trail over a wide area, it may make sense to designate the entire area (in terms of total acres) as semi-primitive motorized and open to snowmobiles. The capacity for this particular use would be spread out over a wide area, giving the user the experience they expect. However, during the summer, in the same semi-primitive motorized area, motorized vehicles are allowed but restricted to designated routes.

To base a capacity calculation on the total acres in an area assumes that all of the acres are available to a particular motorized use—when in fact, only a limited travelway is available for the use. To try and crowd the number of users calculated for an entire area onto a travelway would change the experience the user expected in a semi-primitive motorized setting. The logical solution is to calculate motorized user capacities for this area using only those travelways actually available for the particular use. This same issue is also true for foot trails where the user either does not have the opportunity, or takes the opportunity, to travel away from a limited corridor. The management and user expectations for the ROS covering the area need to address this limiting factor when trying to manage for the expected visitor experience.

R179 Public Concern: The Forest Service should provide sound scientific studies demonstrating user impacts.

Response: The Forest Service used the best scientific studies available at the time the FEIS and 2002 Forest Plan were written. Studies used in the preparation of the planning documents will be a part of the forest plan administrative record at the Forest Supervisor's Office. However, not all specific uses on the forest have had scientific studies done on them to determine their impacts in a particular environment. For example, Forest staff knows of no study completed on the long-term effects on elk populations of ATVs driving through elk calving areas. However, it is safe to conclude from other studies and professional opinions that allowing extensive ATV use in areas where elk are calving is not good for elk populations. In cases such as this, we have had to rely on opinions and observations of trained professionals and other available data to draw conclusions from similar uses in similar environments.

R180 Public Concern: The Forest Service should use symmetric adjustment methodology for analysis of all forms of recreation.

Response: The Forest Service used adjustment methodology to analyze all forms of recreation. Adjustments to capacity in developed sites and ski areas were calculated differently than adjustments to capacity in Wilderness and dispersed areas. Studies have shown when use in developed sites is consistently above the 40 percent theoretical capacity utilization level, long-term resource damage is likely to occur. For developed sites, the total number of persons at one time (PAOT) the facility would theoretically hold was multiplied by the length of season to arrive at the theoretical capacity. This number was then reduced to get the practical capacity.

In dispersed areas and Wilderness, the recreation opportunity spectrum (ROS) provided guidance on experience and resource values. Then, rather than just looking at the gross area and the theoretical capacity of that area, several limiting factors were applied to reduce the capacity figure. Seasons of use were divided into four levels with each season having its own use level. Areas that were not suitable for a particular recreational use were removed from capacity calculations; for example, the acres in a ROS class above 66 percent slope were removed from winter capacity calculations due to avalanche danger, acres for bodies of water were removed from calculations for non-water related recreation uses, and densely treed acres were removed from calculations for winter use. Large adjustments were made in Wilderness and dispersed areas using a linear travelway calculation for hiking, biking and motorized use instead of using area calculations. All of these adjustments are intended to reach a realistic practical capacity much the same as the 40 percent does in developed sites and ski areas.

R181 Public Concern: The FEIS should include analysis of climbing opportunities and effects.

Response: The Forest looked at analyzing climbing and made a decision not to do analysis on it for this large planning effort. Climbing is a minor use on the Forest and analyzed with other similar uses in the dispersed recreation discussions. There are site-specific locations on the Forest where climbing is a main activity and this use in those areas can be better addressed in a site specific analysis which is outside the scope of this document.

R182 Public Concern: Recreation Visitor Day statistics are flawed and should be recalculated by the Forest Service.

Response: Recreation Visitor Day numbers are counted and calculated by standardized methodologies across the country using a process called Recreation Inventory Management, more commonly known as RIM reporting. One Recreation Visitor Day is any person, or combination of persons, engaged in a single activity on a National Forest for a total aggregate period of 12 hours. For example, two persons downhill skiing for six hours each is one visitor day; four persons hiking for three hours each is also one visitor day; and one person camping for 24 hours total is two visitor days. Calculating use in this manner allows us to compare like amounts of use in a consistent manner. Several methods are used to collect accurate use figures: for skier numbers, we use actual lift ticket sales; for trail use, we use trail counters; and, for some uses, we do visitor surveys and double sampling.

Recreation-use figures are only one factor of the many used to determine the appropriate management of a particular area.

R183 Public Concern: Recreation management decisions should be well thought out and based upon the best available science.

Response: The recreation management analysis in the DEIS is based on the best available science known to Forest staff at the time of document preparation. For management decisions to be well thought out, they also need to consider factors such as safety, law, use conflicts, public opinion, need and other components that may not have a direct grounding in scientific research. The FEIS and 2002 Forest Plan will attempt to balance all of these factors.

R184 Public Concern: White River National Forest should establish an ecological basis for recreation management.

Response: The Forest Service uses a couple of different tools assess recreation development and it's ecological and visual effects on the landscape. The first tool is the Recreation Opportunity Spectrum. This gives an area designation to each acre on the Forest and with the designation comes specific guidance on what level or development is permissible to be in harmony with the surrounding environment. The Recreation Opportunity Spectrum does assess the ecological characteristics of the site. The second tool is the Scenery Management System. This analysis tool also ensures any development will fit into the landscape.

That the Forest Service should balance recreation and environmental values is a requirement placed on the Forest Service by sections from at least 2 different laws and/or regulations. Section 219.21 of the Code of Federal Regulations (36CFR) requires the Forest Service "to the degree consistent with needs and demands for all major resources" a broad spectrum of outdoor recreation opportunities shall be provided in each alternative. Further, the Federal Land Policy and Management Act (FLPMA) of 1976 sets a policy that public lands be managed "in a manner that will protect the quality of scientific, scenic, historical, ecological environmental, air and atmospheric, water resource, and archeological values" (FLPMA, Sec 102, (8)).

This was a significant consideration in the FEIS and Forest Plan.

R185 Public Concern: The White River National Forest should reconcile its calculated Recreational Visitor Days with those from the Routt National Forest's Revised ForestsPlan and traffic counts.

Response: Attempting to compare recreation use levels on the Routt National Forest with those on the White River National Forest can only be done by getting the numbers into similar formats. The concept of recreation visitor days (RVDs) was created just for that purpose. One RVD is defined as a single person engaged in an activity on the forest for a period of 12 hours. Thus, a person camping for 24 hours would count as two RVDs and two persons skiing for six hours each would count as one RVD. The methodology to calculate these use figures is set at the national level with standardized times for each activity.

Without relying on RVDs and gross visits, it would be impossible to compare use on the two Forests because, even though they share a border, each has unique characteristics. The Forests differ in methods of public access and the population base living within the forests, as well as the amount of use passing through Forests. The White River National Forest has a major interstate highway passing right through the center of the forest and, within its boundary, two airports with daily commercial flights. In addition to the interstate, the White River has ten more paved highways entering the forest. The population base within the White River is significantly higher than that within the Routt National Forest. Uses on the White River tend to be more focused on developed recreation with 12 downhill ski areas, five cross country ski areas, three backcountry hut systems, three large reservoirs, 20 campgrounds and other developed sites, such as the Maroon Bells with over 200,000 visits a year.

R186 Public Concern: White River National Forest should analyze the effects of future recreation growth on forest resources.

Response: The analysis on the effects of future recreation growth on other Forest resources can be found in the effects analysis for each resource in Chapter 3 of the FEIS.

R187 Public Concern: White River National Forest should consider the negative effects of restricting recreational access and activities to limited areas.

Response: In Chapter 3, Topic 3, Part 1 of the FEIS, Recreation Management, there is a discussion on the negative effects of continued recreation growth and restrictions on uses in the various alternatives.

R188 Public Concern: The FEIS should include a consideration of the cumulative loss of recreational motorized opportunities.

Response: The Forest Service looked at a wide range of alternatives in the FEIS. In Alternative B, there is no change in motorized recreational opportunities. In Alternatives C, D, E and F, there is an increase in the acreage under the Recreation Opportunity Spectrum (ROS) for semi-primitive motorized recreation in summer. In Alternatives B and E, there is no change in motorized recreation in the winter. In all other alternatives, there is a reduction in winter-motorized opportunities. Motorized-use levels and effects of increased use and/or limits on use are discussed in Chapter 3, Topic 3, Part 1 of the FEIS.

R189 Public Concern: The Forest Service should include consideration of cumulative effects of urbanization.

Response: The Forest Service is concerned about the effects increasing populations next to the Forest have on Forest resources. There are many key locations where historical public access onto the Forest across private lands is being restricted by private landowners. The Forest Service will continue to work with landowners adjacent to the Forest and through development permitting entities to keep as much access to the Forest as possible. We can only act in an advisory capacity on this issue in most cases; decisions on maintaining access through private lands are outside the scope of this forest planning analysis.

Part 2—Ski areas

General

S1 Public Concern: The Forest Service should make ski area management decisions based upon public interest and not ski areas' desires.

Response: A revised skier visit forecast was developed and used in the analysis of alternatives for Chapter 3 of the FEIS based on public interest not ski area's desires. The revised skier forecast is based on Census 2000 population data and the Colorado State Demographer's population predictions for the year 2010. Between 1990 and 2000 Colorado was the third fastest growing state in the nation. Population increases within the State are expected to remain high over the next ten-year period as well. The revised skier visit forecast based on the State Demographer's Census 2000 projections was the basis for decisions regarding future allocations of National Forest System lands for skiing in the 2002 Forest Plan. It is predicted in the analysis (FEIS, Chapter 3, Topic 3, Part 2, Ski Areas, Environmental Consequences, Future Needs) that almost all of the future growth in skier visits in Colorado will be generated by increases in State and local populations.

S2 Public Concern: The Forest Service should withdraw all category 8 management areas from mineral entry.

Response: Table 3-7 lists locatable mineral activities and oil/gas leasing as allowable activities in developed recreation complexes (8.21) and ski areas (8.25) in the DEIS. The Forest Service has determined that mineral entry and oil/gas leasing are incompatible with the high recreational use of 8.21 and 8.25 areas. This has been corrected for the FEIS analysis and in management area prescriptions within the 2002 Forest Plan.

S3 Public Concern: Ski areas should reimburse the government at fair market value for leasing public land.

Response: This concern is outside the scope of the forest plan. Congressional direction to the Forest Service regarding fees owed the government from ski areas is contained in the Omnibus Parks and Public Lands Management Act of 1996, 16 U.S.C. 497c, Ski Fee Bill. Reference: Forest Service Handbook (FSH) 2709.11-99-2 Washington Office Amendment.

Ski Area Expansion, General

S4 Public Concern: The Forest Service should restrict ski area expansion.

S4.1 Quality of Experience

Response: Restriction of ski area expansion was considered under alternatives D and I in the FEIS. Both of these alternatives would limit future ski area development to their current ski area boundaries. The potential of each ski area to provide additional opportunities for developed skiing within their existing ski area boundaries would be subject to site-specific environmental analysis.

S4.2 Restriction Of Winter Access For Backcountry Skiers

Response: Backcountry skiers are welcome to use the majority of National Forest System lands for skiing. Very few acres of National Forest System lands in Colorado are permanently closed to backcountry skiers. When accessing the backcountry from

developed ski areas skiers may be subject to restrictions or limited to specific access points for safety reasons. The Colorado Skier Safety Act allows ski areas to limit skier use within their ski area boundary when needed for safety or other administrative purposes. The Forest Service encourages ski areas to prepare boundary management plans to address backcountry access issues for specific areas. Management direction regarding backcountry access is contained in the annual operating plans for each individual ski area and is addressed at the site-specific level. In some locations human uses may be seasonally restricted to protect wildlife habitat or other natural resources. It is the intent of the forest travel management plan to identify travel constraints for specific recreation uses within each management prescription area for all National Forest areas. The standards and guidelines contained in the 2002 Forest Plan identify appropriate uses for each management prescription area.

S5 Public Concern: The White River National Forest should protect South Game Creek from ski area expansion.

Response: Each winter about 10,000 backcountry skiers and snowboarders ski in South Game Creek. No designated ski trails or uphill access are currently provided to return skiers back to Vail ski area. Under Alternatives B, D and I, current levels of use would continue to increase. Under Alternatives C, E, F and K South Game Creek is allocated the 8.25 management prescription and Vail is assigned responsibility for public safety for this area. Under these alternatives the Forest Service would allow developed skiing, subject to detailed analysis.

S6 Public Concern: The White River National Forest should not allow additional development at Keystone.

Response: The 2002 Forest Plan makes land allocation decisions based on use levels, demographic trends, and previous approvals. If new opportunities for developed skiing and snowboarding at Keystone are proposed they will be subject to site-specific environmental analysis.

S7 Confine Additional Ski Area Development Within Current Permit Boundaries Only

S7.1 Aspen Ski Company

S7.2 Beaver Creek

S7.3 Breckenridge

S7.4 Vail

S7.5 Vail's Proposed Game Creek Expansion

Response: This concern is considered within the range of alternatives. It was analyzed in the FEIS in Alternatives D and I. Under these two alternatives ski area boundaries remain the same. Within the range of alternatives analyzed in the FEIS, South Game Creek could be added into the Vail Ski Area under Alternative K. The South Game Creek area is analyzed as a potential future expansion of Vail in the FEIS, Chapter 3 – Ski Areas, Future Expansion section. More opportunities for developed skiing were considered within the other alternatives evaluated in the FEIS. The revised skier visit forecast was also developed in response to public comments generated by the DEIS and Proposed 2002 Forest Plan (November 1999). Alternative K was developed using this revised skier

visit forecast. It would make boundary adjustments for some ski areas in Pitkin and Eagle County and allow for expansion of the four existing ski areas in Summit County in response to specific needs.

S8 Public Concern: The Forest Service should prohibit the development of any additional ski area terrain.

Response: This concern is within the range of alternatives considered. Alternatives D and I prohibit the development of any additional terrain outside existing ski area boundaries. Both of these alternatives do not allow any of the existing ski areas to provide new opportunities for developed skiing outside existing ski area boundaries.

S8.1 Loss Of Public Land To Private Real Estate Development

Response: The Forest Service does not allow private development on public lands. If public lands are congressionally transferred to private ownership the administrative jurisdiction for those lands is transferred to the appropriate administrative city or county government authority. The Forest Service has no jurisdiction, administrative authority or control of private lands, regardless of proximity to National Forest System lands. County Commissioners and community governments are responsible for land use codes, zoning regulations, and all planning decisions regarding land uses and development of private lands. According to Frick, BBC Research and Consulting, Denver, CO, 1997, An Analysis of Economic Trends in the White River Forest Region, "The United States Forest Service's ability to influence local economic growth and development activity off site of the forest through management of the forest uses is and will remain very limited." However, the role of ski areas and potential expansion in local economic and social conditions is analyzed and considered in the FEIS, Chapter 3- Communities.

S9 Public Concern: The Forest Service should address the bias to expand in the Ski-Based Resorts found in DEIS analyses.

Response: The DEIS analysis was re-evaluated for the FEIS and 2002 Forest Plan to identify and remove any suggestion of bias. It is important to note that the range of alternatives presented in the DEIS (and carried forward into the FEIS) include alternatives that allow for expansion as well as alternatives that do not.

S10 Public Concern: The Forest Service should modify the criteria used to determine the need for expansion.

Response: For the FEIS, a revised skier visit forecast was developed using updated information on skier visitation trends and demographic data. Demographic trends are a major determinant for estimating skier days at the local and national level. National demographic statistics do explain a recent lack of growth in the national skier market and provide a strong indicator of future trends in the ski industry. The criteria used to determine the need for expansion is outlined in the FEIS, Chapter 3, Topic 3, Part 2, Ski Areas, and Environmental Consequences, Future Needs section.

S11 Public Concern: The Forest Service should evaluate proposed ski area development through a National Environmental Policy Act and Endangered Species Act review process.

Response: Congress authorizes and directs that, to the fullest extent possible, the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in the National Environmental

Policy Act (NEPA) of 1969. All new developments proposed for construction on National Forest System lands are analyzed by the Forest Service according to the terms of NEPA, as amended by Public Law 91-190, 42 U.S.C. 4321-4347, January 1, 1970. One requirement of all formal environmental reviews that occur within the NEPA process is to consider the effects of all proposed actions on threatened and endangered species, and provide for the conservation of such species. These considerations are conducted in accord with the provisions of the Endangered Species Act of 1973.

S12 Public Concern: The Forest Service should tier ski area expansion to skier-day growth since 1999-2000.

Response: The method used by the White River National Forest to estimate future use is based on Census 2000 data and the State Demographer's population predictions for 2010. From a statistical standpoint, one year of ski area use does not provide enough numerical data to make long-range assumptions on skier use trends. Ephemeral factors such as weather, economic trends, changes in user demographics, and world events, to name a few, all have potential to create measurable effects on annual skier visits.

S13 Public Concern: The Forest Service should provide assurances that the Intermix Prescription is not for the near exclusive benefit of the ski industry.

Response: The 7.1 Intermix management prescription encourages cooperative relations with other agencies and adjacent landowners. The guideline for real estate management with areas allocated the 7.1 management prescriptions in the 2002 Forest Plan is to develop land adjustment patterns in cooperation with local governments, private landowners, forest users, and the general public. The management theme for 7.1 management areas is to pursue consolidation of landownership patterns. These lands are generally undergoing pressure from urban and private residential development. Not all of these areas are adjacent to ski areas. For example, under Alternative K the Golden Horseshoe area north of the Town of Breckenridge was allocated to the 7.1 management prescription. This is a high use recreation area with a mix of private and public lands, but not adjacent to a ski area.

S14 Public Concern: The FEIS should clarify the meaning of "do not allow any expansion of existing ski-based resorts."

Response: Increases in capacity that may occur within existing ski area boundaries in the future are not considered to be "expansions" within the context of forest planning. Expansion areas are defined as areas outside an existing ski area boundary. When a ski area is increased in size a ski area is consider to be expanded. Alternatives D and I do not allow any of the existing ski areas administered by the White River National Forest to be expanded beyond their existing ski area boundaries, and, consequently, do not allow any expansions. Alternatives B, C, E, F, and K allow some existing ski areas to expand outside their existing ski area boundaries. This results in a change in the number of acres of National Forest System lands where opportunities to provide developed skiing and snowboarding are allowed.

S15 Public Concern: The Forest Service should allow ski area expansion.

S15.1 To Accommodate An Aging Clientele

S15.2 Expansion For Safety Reasons

S15.3 Additional Ski Area Development Where There Is Demonstrable Need

S15.4 Current Ski Area Expansion While Discouraging New Ski Areas

S15.5 By Adopting Modified Alternative C

Response: Ski area expansions were considered within the range of alternatives evaluated in the FEIS. The revised skier visit forecast was also developed in response to public comments generated by the Draft EIS and Proposed 2002 Forest Plan (November 1999). Alternative K was developed using this revised skier visit forecast. This alternative would not allow the ski area in Garfield County to expand beyond its current boundary, but would make boundary adjustments for the ski areas in Pitkin and Eagle County in response to some of these other needs. Alternative K also would allow for expansion of some ski areas, primarily in Summit County.

S16 Ski area expansion should be allowed in areas of high-elevation terrain requiring no snowmaking.

Response: There may or may not be a correlation between high elevations and the number of snowmaking proposals received in the future. Proposals for snowmaking are evaluated based on site-specific environmental analysis when they are received. Most of the high elevation terrain with potential skiing that was evaluated in the FEIS is located in Summit County. Potential ski area expansion is evaluated within the range of alternatives in the FEIS, Chapter 3 – Ski Areas, Affected Environment- Future Expansion.

S17 Ski areas should be limited to current boundaries until the existing socio-economic effects are mitigated and a clear future vision established

Response: Social and economic effects associated with each of the alternatives included in the 2002 Forest Plan are discussed in the FEIS, Chapter 3- Economics section. The master development plan for each ski area contains a clear future vision describing how each ski area will appear after full-build out. The social and economic effects of ski areas are taken into consideration and analyzed when specific proposals are received. Since most ski areas are part of an integrated operation that occurs on both public and private lands local governments also play a key role in the Forest Service approval process. Elected representatives from affected towns, counties, and citizen groups are encouraged to participate in the evaluation of all development proposals on National Forest System lands that have social and economic effects. Because the Forest Service has no control or jurisdiction over important issues such as population growth and private land development it is generally not possible for the Forest Service to exercise federal controls over private lands under the jurisdictions of counties or other municipalities.

S18 Ski area expansion should be allowed only if ski accessible backcountry is closed to snowmobiles

Response: Transportation issues, such as snowmobile access, will be addressed in the Travel Management Plan – to be initiated after approval of the 2002 Forest Plan. 2002 Forest Plan alternatives were based on a variety of issues including access to the

backcountry. Ski area expansion was analyzed at varying levels across the forest. Additional backcountry non-motorized access was looked at and several areas that were previously motorized were added in Alternative K. Some new areas are located in areas where the ski huts are located and the primary access and egress routes leading to and from those sites.

S19 Alternative Methods Of Expansion And Improvement

Response: A brief evaluation of potential expansion areas is included in the FEIS, Chapter 3 – Ski Areas, Future Expansion. One of the categories evaluated included National Forest System lands adjacent to existing ski areas where avalanche danger is high and in which an increasing amount of use from skiers/riders that access the backcountry from ski areas occurs. While the intent of the Forest Plan Revision process is to decide which of these lands should be allocated for potential ski area development, the actual management methods would be subject to future environmental analysis where alternatives could be analyzed.

S20 Public Concern: The Forest Service should allow ski area expansion above tree line in low impact areas.

Response: The Forest Plan analyzed a variety of locations that have potential for skiing above timberline in Alternatives B, C, E, F and K. The environmental effects of ski area construction and operation vary by location depending on conditions specific to each area. Potential expansion areas are discussed in the FEIS, Chapter 3 – Ski Areas, Affected Environment, and Future Expansion. There are some locations above timberline within and adjacent to existing ski areas where some additional high quality lift-served skiing could be provided.

S21 Public Concern: Any mitigation for Threatened and Endangered species resulting from ski area expansion should be limited to the permit areas.

Response: Mitigation for any Ski Area Development project will be decided in a site-specific analysis in consultation with the US Fish and Wildlife Service. This process will continue to follow the direction contained in the Endangered Species Act.

S22 Public Concern: The White River National Forest should provide conclusive evidence that ski areas and wildlife are incompatible.

Response: The planning process for ski areas is tiered to site-specific analyses. The Forest Service conducts detailed analyses related to wildlife issues when evaluating all new facility proposals. Many local and non-local studies (Alldredge, 2001, "Upper Eagle River Valley Elk Study", Colorado State University, Fort Collins, CO.; Ruggiero et al, 1999, "Ecology and Conservation of Lynx in the United States", USDA Forest Service; Ruediger et al, 2000, "Canada Lynx Conservation Assessment and Strategy", 2nd edition. USDA Forest Service) were completed in recent years documenting various levels of impacts from ski areas and other similar developments to a wide range of wildlife species. The Forest Service used these studies in assessing wildlife habitat compatibility through potential impacts and from existing and future facilities. Allocation of an area of National Forest System land to the 8.25 management prescription does not result in automatic approval of development. Through the tiered planning process, detailed information is gathered at the site-specific level to adequately assess the compatibility of wildlife habitat issues and ski area development.

S23 Public Concern: Forest Service ski area expansions should accommodate wolverine and lynx migrations.

Response: The White River National Forest will follow direction contained in the Rocky Mountain lynx strategy and the 2002 Forest Plan to determine appropriate management of ski area operations regarding accommodation of wolverine and Canada lynx migration.

S24 Public Concern: Permitted ski areas of the White River National Forest should pay for the right to expand by funding Forest improvements.

Response: This concern is outside the scope of the forest plan. Congressional direction to the Forest Service regarding fees owed the government by ski areas is contained in the Omnibus Parks and Public Lands Management Act of 1996, 16 U.S.C. 497c, Ski Fee Bill (Reference: FSH 2709.11-99-2 Washington Office Amendment). Fees owed the government under this bill are considered a rental charge for use of National Forest System lands. These rental charge fees go directly to the U.S. Treasury Department. In a separate process, Congress annually provides the Forest Service with a level of funding they determine to be appropriate for management of National Forest resources.

S25 Public Concern: The Forest Service should allow ski areas the option to propose additional 8.25 management area prescriptions with approval of the District Ranger.

Response: This concern is outside the scope of the Forest Plan. Please refer to the Forest Service Manual 2704.3 – Delegation of Authority for Issuance and Approval of Special Uses Authorizations. The Regional Forester has land allocation authority to designate ski areas under the forest planning process, as well as, approve and issue special use authorizations. Forest Supervisors may approve and issue special-use authorizations for sites previously designated as winter sports sites by the Regional Forester. District Ranger authority with respect to ski area permits, is limited to ensuring on-the-ground administration of the permit and compliance with the forest plan. District Rangers do not have the authority to amend a forest plan by approving additional 8.25 management areas.

S26 Public Concern: The Forest Service should limit the amount of forest under the 8.25 management area prescription in order to meet goal #1.

Response: Goal 1 is to ensure sustainable ecosystems. All of the alternatives analyzed in the FEIS limit the amount of National Forest System lands under the 8.25 management prescription. As an example, Alternative B would allocate the most acreage to 8.25. Under this Alternative, the land allocated to 8.25 would be less than 4 percent of the total forest land base.

S27 Public Concern: The Forest Service should consider that the McInnis Plan for ski area expansion is based upon ski area desires and not their need.

Response: Please refer to the **www.house.gov/mcinnis** website for a description of the McInnis Plan. All of the expansion sites included in the McInnis plan were analyzed within the range of alternatives for the DEIS, except the eastern portion of Rifle ski area. Through this analysis the Forest Service has identified a variety of factors that may provide justification for expansion such as: public safety, mix of terrain types, improved circulation, redistribution of skiers to lower densities and a variety of other concerns

other than demand (need). Each area considered for expansion is analyzed in detail at the site-specific level of the tiered NEPA planning process.

S28 Public Concern: The Forest Service should restrict "excessive spending on new development" at the expense of other resources.

Response: This concern is outside the scope of the Forest Plan. When improvement projects are proposed by the private sector for ski area facilities on National Forest System lands, the private applicant (not the Forest Service) pays for the cost of preparing all environmental analyses and NEPA documents. The Forest Service does not regulate the amount of money spent on privately owned facilities located on National Forest System lands.

S29 Public Concern: The Proposed Forest Plan should follow more stringent standards and guidelines to the extent that they do not preclude the primary management area prescription.

Response: The 2002 Forest Plan, Introduction to Forest wide Standards and Guidelines states that, "When forest wide standards and guidelines conflict with management area standards and guidelines, those that are more stringent or restrictive are applied."

S30 Public Concern: The Forest Service should clarify wording found in Forest wide Special Use Guideline #1.

Response: NEPA is the preferred source for defining "reasonableness" in environmental analysis documents. There is a vast array of local conditions that may be associated with site-specific proposals. Therefore, "reasonableness" will continue to be evaluated on a case-by-case basis throughout the tiered NEPA process.

Ski Area Expansion, Existing Resorts

S31 Public Concern: The Forest Service should correct the misperception that a significant reserve of useable undeveloped terrain remains within existing White River ski area permit boundaries.

Response: This concern is considered in the FEIS analysis. There is a finite number of acres on public and private lands within the boundaries of the White River National Forest that have physical characteristics suitable for skiing. Table 3-87 of the FEIS indicates that 46.3 percent of the acreage within existing ski area boundaries in year 2000 is skiable acres. Table 87 indicates that up to 66 percent of the acres inside some ski area boundaries are currently skiable, while others are as low as 22 percent. Some of the existing ski areas with a high existing percentage of skiable terrain may be approaching full build-out due to limiting environmental constraints. These areas will have little opportunity to provide additional developed skiing and snowboarding inside their existing ski area boundaries in the future. When projecting future acreage needs for skiing, it was estimated that approximately 45 percent of available acres allocated to each ski area could be developed for skiing. This is explained in the FEIS, Chapter 3 – Ski Areas, Environmental Consequences, Total acres needed. Until an area is analyzed in detail at the site-specific level, the exact capacity cannot be known. The purpose of the forest plan is allocation of management prescriptions as a form of zoning; it is not intended to make specific decisions regarding detailed elements of individual ski areas.

S32 Public Concern: The White River National Forest should allow expansion of ski areas.

S32.1 Arapahoe Basin Ski Area - Montezuma Bowl and the Beavers

S32.2 Beaver Creek Ski Area

S32.3 Beaver Creek Ski Area - Upper Stone Creek

S32.4 Breckenridge

S32.5 Copper Mountain Ski Area

S32.6 Copper Mountain In Exchange For Other Permitted Lands

S32.7 Independence Mountain, The Exit Route, Keystone Gulch Road

S32.8 Sunlight Mountain Resort Ski Area

S32.9 South Game Creek

S32.10 Aspen Ski Area

S32.11 Burnt Mountain Traverse

Response: A revised skier visit forecast was developed for the FEIS and used in the analysis of alternatives. This is documented in the FEIS, Chapter 3, Part 2 – Ski Areas, Skier Visit Forecast. Most of the expansion sites referred to in this concern (and sub concerns) are also discussed in the FEIS, Chapter 3, Part 2 – Ski Areas, Future Expansion, and incorporated into the various alternatives that were analyzed.

S33 Public Concern: The Forest Service should confine Vail Resort to its existing boundary.

Response: This concern is considered within the range of alternatives evaluated in the FEIS. Alternatives D and I confine Vail ski area to its existing boundary. Alternative K reduces by 2,000 acres the number of acres allocated to Vail ski area for skiing and snowboarding. In this alternative Commando, Mushroom and Benchmark Bowls are removed from within the ski area boundary, allocated to wildlife management prescriptions, and consequently, eliminated from future consideration as developed ski sites.

S34 Public Concern: The White River National Forest should continue to permit Chicago Ridge as part of the Ski Cooper ski area.

Response: This concern is considered within the range of alternatives analyzed in the FEIS. Alternatives B, C, E and F would allow continued operation of Chicago Ridge as part of the Ski Cooper ski area, as well as allow opportunities for developed skiing. Under Alternative D, Chicago Ridge is allocated to 5.4 (Forested flora and fauna habitats), which allows continued operation of the snowcat skiing operation but precludes future opportunities for developed skiing. Under Alternatives K and I Chicago Ridge is allocated to the 1.32 (Backcountry recreation, limited winter motorized) management prescription. These alternatives also allow the snowcat operation to continue, but do not allow the construction of facilities that support developed skiing.

S35 Public Concern: The Forest Service should consider the use of buffer zones within ski area permit boundaries to stem real estate development on adjacent private land.

Response: The Forest Service does not allow private real estate development on National Forest Systems lands. There are many factors other than skiing that also contribute to the desirability of certain parcels of land for private development. Zoning laws promulgated by state, county, or local governments more commonly regulate private land development.

S36 Public Concern: The Forest Service should clarify the permit plans for the McCoy Park area.

Response: The 1984 Forest Plan allocated the McCoy Park area for alpine and Nordic skiing and snowboarding. Beaver Creek is currently permitted to provide a managed skiing operation in McCoy Park with designated trails, signs, ski instruction, mountain rescue, trail grooming and packing, ski patrol services, and boundary management. There is a warming hut and emergency telephone near the western summit. Restrooms are available. The 2002 Forest Plan analyzed a variety of alternatives for the McCoy Park area, including skiing. Alternatives B, E, F and K would continue to allocate these areas to the 8.25 management prescription the same as the existing 1984 Forest Plan. All of these alternatives allow managed alpine and Nordic skiing. Alternative C allocates McCoy Park to the 5.43 management prescription (Elk habitat). Under this Alternative the existing Nordic operation could continue but alpine skiing facilities would not be considered. Under alternative D, McCoy Park would be allocated to 5.4 (Forested flora and fauna) where, similar to alternative C, the existing Nordic operation could continue but alpine skiing facilities would not be considered. Alternative I would allocate McCoy Park to 1.31 (Backcountry recreation, non-motorized) and 1.2 (Recommended wilderness). Under this Alternative, the existing Nordic operation would cease and no further development would be considered. The extent to which McCoy Park and Mud Springs are used for skiing in the future will be determined based on the alternative selected in the 2002 Forest Plan and a tiered analysis of site-specific proposals submitted to the Forest Service for approval.

S37 Public Concern: The White River National Forest should retain Mushroom Bowl and Benchmark for Nordic skiing in the ski area permit.

Response: (Please also see the response to concern S9) Under all of the alternatives analyzed in the DEIS (Alternatives B, C, D, E, F and I), Mushroom and Benchmark Bowls would be retained in the Vail Ski Area Permit. Under Alternative K of the FEIS, Mushroom Bowl and Benchmark would be removed from Vail Ski Area and allocated to 1.31 (Backcountry recreation, non-motorized) and 4.3 (Dispersed recreation). These prescriptions would allow Nordic skiing, but not under a developed setting.

S38 The White River National Forest should allow expansion of the Arapahoe Basin ski area.

Response: Under Alternatives B, C, E, F and K of the FEIS, Arapahoe Basin ski area would be allowed to expand.

S39 Public Concern: The Forest Service should protect Guller Gulch, Jones Gulch, and Independence Mountain from ski area development.

Response: This comment is within the range of alternatives considered in the 2002 Forest Plan. Alternatives D and I do not allow developed skiing and snowboarding in Guller Creek, Jones Gulch, or Independence Mountain. Both of these alternatives were analyzed in the FEIS.

S40 Public Concern: The White River National Forest should retain certain 8.25 Management Areas.

S40.1 Mud Spring

Response: Under Alternatives B, E and F, Mud Springs would remain within the 8.25 management prescription. Under Alternatives C and K, Mud Springs would be allocated to the 5.43 (Elk habitat) prescription.

S40.2 Proposed Rifle Ski Area

Response: Under Alternatives B and E, the proposed Rifle Ski Area would be allocated to 8.25. Under Alternatives D and K, the proposed Rifle Ski Area would be allocated primarily to 5.43.

S40.3 McCoy Park

Response: Please see the response to concern S36.

S41 Public Concern: The White River National Forest should extend Management Area 8.25 to include Independence Mountain.

Response: Alternatives B, C, E, F and K would allocate a portion of Independence Mountain, which lies immediately east of Keystone Mountain, to the 8.25 management prescription.

S42 Public Concern: The Forest Service should change the prescription for the Pandora's area on Aspen Mountain from 7.1 to 8.25 to accommodate the lift proposed in the Master Plan.

Response: Alternatives B, E and K of the FEIS would allow Aspen Ski Company to develop Pandora's for alpine skiing.

S43 Public Concern: The Forest Service should amend the management area prescription for the Buttermilk Ski Area boundary to allow construction of a Tiehack trail.

Response: In 1994, the Forest Service decided to allow construction of a new ski trail in the Buttermilk ski area to reduce congestion on the Homestake Road. The management prescription for this area would be 8.25 under Alternatives B, C, E, F and K.

S44 Public Concern: The White River National Forest should allow expansion of ski resorts in Summit County.

Response: Expansion of ski resorts in Summit County would be allowed under Alternatives B, C, E, F and K of the FEIS.

S45 Public Concern: The Forest Service should encourage Breckenridge to improve its existing ski area.

Response: This comment is outside the scope of the Forest Plan. The amount and rate of spending needed to improve existing facilities is at the discretion of the ski area operator. When compared with other ski areas administered by the White River National Forest Breckenridge has the highest amount of use per acre per year as shown in the FEIS, Chapter 3, Ski Areas, Table 87 Percentage of ski areas that are skiable, and Table 88 Skiers per acre.

S46 Public Concern: The Forest Service should designate portions of Peaks 5, 6, 8, 9 and 10 as management area 8.25.

Response: Portions of Peaks 5-10 along the Ten Mile Range west of Breckenridge would be allocated as 8.25 under Alternatives B, C, E, F and K. If Breckenridge Ski Area proposes new facilities within the area allocated to the 8.25 management prescription, the Forest Service will analyze such proposals at the site-specific level under National Environmental Policy Act procedures.

S47 Public Concern: The Forest Service should reduce Management Area 8.25 acreages.

S47.1 Arapahoe Basin

Response: Under the 1984 Forest Plan, 2,479 acres around the Arapahoe Basin ski area was allocated to the 1B (now 8.25) management prescription. Under Alternative K of the FEIS, this allocation would be reduced to 1,913 acres. Although the total acreage allocated to the 8.25 management prescription has been reduced, Alternative K would allow both Montezuma Bowl and the Beavers to be added into the Arapahoe Basin Ski area.

S47.2 Aspen

Response: Carefully managed growth is a key community value in Aspen and Pitkin County. Several undeveloped areas adjacent to existing ski areas with good potential for skiing in the Aspen area (such as Little Annie Basin, Owl Creek area and Maroon Bowl) have never been developed primarily due to a lack of public support. The Forest Service acknowledges the opinions of elected officials and local communities and their general lack of support to provide new opportunities for developed skiing in Pitkin County. The Forest Service also acknowledges Aspen Skiing Company's desire to respect local values and management intentions regarding the most appropriate land uses for selected National Forest System lands.

S47.3 Beaver Creek

Response: Under the 1984 Forest Plan, 4,809 acres around the Beaver Creek Ski Resort were allocated to the 1B (now 8.25) management prescription. Under Alternative K, this would be reduced to 3,801 acres (primarily by removing Mud Springs from the 8.25 prescription).

S47.4 Breckenridge

Response: Under the 1984 Forest Plan for the White River National Forest, 6,967 acres around the Breckenridge Ski Resort were allocated to the 1B (now 8.25) management prescription. Under alternative K, this would be reduced to 5,553 acres.

S47.5 Copper Mountain

Response: Under the 1984 Forest Plan for the White River National Forest, 6,525 acres around Copper Mountain were allocated to the 1B (now 8.25) management prescription. Under alternative K, this would be increased to 7,551 acres.

S47.6 Keystone

Response: Under the 1984 Forest Plan, 8,367 acres around the Keystone Ski Resort were allocated to the 1B (now 8.25) management prescription. Under Alternative K, this would be increased slightly to 8,376 acres.

S47.7 Sunlight Mountain Resort – and –

S47.8 Ski Sunlight

Response: Under the 1984 Forest Plan for the White River National Forest, 6,419 acres around Ski Sunlight were allocated to the 1B (now 8.25) management prescription. Under alternative K, this would be reduced to 2,390 acres.

S48 Public Concern: The Forest Service should remove the existing 8.25 prescription covering the area of Parkville and the upper drainage of the South Fork Swan River.

Response: This concern is considered within the range of alternatives analyzed in the FEIS. Only under Alternative B would this area remain within the 8.25 (Ski-based resorts) management prescription. All other alternatives would preclude developed skiing. Under Alternatives C, D and E, this area would be allocated to 4.32 (Dispersed recreation, high use). Under Alternative F, this area would be allocated to 7.1 (Intermix). Under Alternative K, the Parkville area would be allocated to 5.41 (Deer and elk winter range) and the upper drainage of the South Fork Swan River would be allocated to 5.45 (Forest carnivores).

S49 Public Concern: The White River National Forest should allocate the Tucker Creek drainage to management area 4.3.

Response: This concern was considered in the analysis and formulation of the Alternatives. Tucker Creek was allocated the 4.3 management prescription and analyzed in the FEIS in Alternatives D and I. The 4.3 management prescription allows dispersed motorized and non-motorized recreation. Private lands adjacent to Tucker Creek are closed to public entry thus restricting access to the Tucker Creek drainage for dispersed recreation.

Facilities and Improvements

S50 Public Concern: The Forest Service should develop standards and guidelines for snowmaking.

Response: Standards and Guidelines for snowmaking are in the 2002 Forest Plan. Most snowmaking issues are operational concerns that are decided at the project level and not the Forest Plan level.

S51 Public Concern: The Forest Service should limit snowmaking.

Response: This concern is outside the scope of the Forest Plan. Snowmaking is an operational issue that is decided at the project level not the Forest Plan level. Snowmaking decisions are addressed in relation to specific proposals and are evaluated through standard NEPA required environmental analyses.

S52 Public Concern: The Forest Service should allow ski lifts in non-permitted areas.

Response: Special use permits issued under the 1986 Ski area act are only issued for National Forest System lands allocated to the 8.25 management prescription. This is the authorization given to the Forest Service by Congress. Without this authorization the Forest Service has no authority to allow opportunities for developed skiing. Permits are needed to assure that safety, liability, and resource protection needs are addressed prior to construction.

S53 Public Concern: The ski area improvement review process should include representatives from federal and local governments and the private sector.

Response: Forest Service policies that relate to ski area planning are available in Forest Service Manual (FSM) 2342 and Forest Service Handbook (FSH) 2309.23. Chapter 30 outlines the Joint Review Process for Winter Sports Complex Planning that requires the Forest Service to participate in coordinated planning and review with all levels of government and the private developer. All affected federal, state, and local agencies and jurisdictions, special interest groups, and the public, are encouraged by the Forest Service to participate in the NEPA process during site-specific reviews for each ski area.

S54 The Forest Service should allow expansion of ski areas to include dispersed recreation areas with ski patrol services but no infrastructure.

Response: The Forest Service allows ski areas to manage National Forest System lands for skiing and snowboarding when there are no facilities evident as long as the area meets the terms of the Colorado Skier Safety Act. Highlands Bowl at Aspen Highlands and Hanging Valley at Snowmass are two examples of popular bowls within existing ski areas where developed skiing is provided by the ski area, but without providing uphill access. The types and level of use and capacities of facilities provided in each portion of a ski area are subject to detailed NEPA analysis. Limited development that allows dispersed recreation or a backcountry experience may be appropriate for some portions of some ski areas.

S55 Public Concern: The White River National Forest should provide assurance that backcountry access to South Game Creek Bowl will not be restricted.

Response: The South Game Creek area is analyzed as a potential future expansion area in the FEIS, Chapter 3 – Ski Areas, Future Expansion section. Within the range of alternatives analyzed in the FEIS, South Game Creek could be added into the Vail Ski Area under Alternative K. Prior to any access changes, development or construction of facilities in this area, site-specific environmental analysis would be conducted and subjected to public review.

S56 Public Concern: The Forest Service should require ski areas to provide low-income housing for their employees.

Response: This concern is outside the scope of the Forest Plan. Employee housing is generally within the purview of local governmental entities because it most often deals with zoning decisions for private lands.

S57 Public Concern: The Forest Service should prohibit ski area staff housing on public land.

Response: This concern is outside the scope of the Forest Plan. Congress is responsible for establishing direction, laws, and policies that guide the Forest Service in regards to this issue. Currently, the Forest Service only has the authority to allow limited staff housing on public lands. These housing decisions can only be justified on the basis of security needs, protection of financial investment, public safety concerns, lack of other opportunities on private lands, or protection of natural resources (FSM 2341.5).

S58 Public Concern: Vail should expand its parking facilities.

Response: Parking availability for individual ski resorts is addressed at the project level through the master planning process and, therefore, is outside the scope of the Forest Plan.

S59 Public Concern: The White River National Forest should confirm that the new Guidelines do not affect ski trail brush cutting.

Response: As a programmatic land allocation and land management document the 2002 Forest Plan does not confirm that new guidelines will not affect ski trail brush cutting. The effects of ski trail brush cutting can only be determined by site-specific analysis of the vegetative material being cut, its relationship to its immediate environment, and its specific role in adhering to the Forest wide Goals and Objectives (Chapter 1, FEIS, and Forest wide and Management Area Prescription Standards and Guidelines listed in Chapters 2 and 3).

S60 Public Concern: The White River National Forest should amend the language of Standard 3 for Management Area 8.25.

Response: Not all roads within individual ski areas are designed to be ski-ways during the winter season. A guideline to make all roads "skiable" may preclude appropriate summer road locations that are designed to best fit into the existing terrain. The intent of this guideline is to avoid unnecessary impacts to natural resources, such as scenery and water quality. The intent does not include making the centerline of all roads skiable. By avoiding steep cuts and fills in areas that cross fall-line skier routes, this guideline should make it easier for skiers or boarders to traverse roads while maintaining control.

S61 Public Concern: The Forest Service should clarify how the proposed Forest wide Biodiversity Standard #2 would apply within the 8.25 management area prescription.

Response: Forest-wide standards are applied uniformly to all acres of National Forest System lands regardless of management prescription. Management area standards and guidelines only apply to specific management areas. When conflicting standards exist the more stringent standard is applied.

Proposed New Ski Resorts

S62 Public Concern: The Forest Service should confine ski area development by denying any new ski area development, while permitting maximum expansion of existing ski areas.

Response: Under Alternatives C, D, F, I and K of the FEIS, no new ski areas would be allocated. Current direction in the Forest Service is that expansion of existing sites is given priority over new sites. This directive is articulated in the Rocky Mountain Regional Guide, Appendix B, Inventory of Potential Ski Area Sites, pages 1-4, May 1992.

S63 Public Concern: The Forest Service should remove management area prescription 8.25 from the proposed Rifle Ski Area.

Response: Development of the Rifle Ski Area is considered within the range of alternatives.

S64 Public Concern: The Forest Service should ensure public access to Coal Basin.

Response: All the Alternatives presented in the FEIS would allow public access to Coal Basin. The majority of Coal Basin would be allocated to 1.32 (Backcountry recreation, limited winter motorized) under Alternative K. This management prescription allows non-motorized recreation with limited winter motorized use. Alternative B would allocate the Coal Basin area to 8.25 (Ski-based resorts); Alternative C would allocate it to 4.3 (Dispersed recreation), Alternative D would allocate it to 3.32 (Backcountry recreation, non-motorized with winter motorized). Alternative E would allocate Coal Basin to 3.1 (Special interest area, emphasis on use or interpretation); Alternative F would allocate it to 5.12 (General forest and rangelands, range vegetation emphasis), and Alternative I would allocate it to 2.1 (Special interest area, minimal use and interpretation).

S65 Public Concern: The Redstone Inn should be granted a winter recreation permit for snow shoeing, cross-country skiing, and backcountry skiing in Coal Basin.

Response: This concern is outside the scope of the Forest Plan. The Forest Plan does not establish site-specific decisions on permit issuance.

S66 Public Concern: The White River National Forest should prohibit commercial winter recreation in Coal Basin.

Response: Please also see the response to concern S31. The 1984 Forest Plan allocated this area for developed skiing and assumed Coal Basin would become a commercial ski area. A variety of alternatives were considered for this area in the 2002 Forest Plan, including no commercial development. Under Alternative K the majority of Coal Basin would be allocated to 1.32 (Backcountry recreation, limited winter motorized). This management prescription would allow non-motorized recreation with limited winter motorized use. A small commercial winter recreation operation could be allowed under this prescription.

S67 Public Concern: The Forest Service should permit currently closed ski resorts to reopen rather than allocating additional Forest Service lands for ski area expansion.

Response: The Forest Service is not aware of any closed ski areas on the White River National Forest that meet the necessary criteria. A few small ski tows were operated more than 50 years ago in several locations that are no longer open. None of these sites are equivalent to today's modern ski areas. A few historic sites including Red Mountain, Glenwood Springs; Camp Hale Military Base, Pando; Redstone, Town of Redstone; Mt. Daly, Town of Marble; Montezuma Basin; Ashcroft; and Meadow Mountain, Minturn operated ski tows in the past. Historic ski jumps were also located on several sites in Summit and Eagle Counties. All of these sites have been closed for many years because they were not economically viable, lacked public support, or had poor snow conditions. No proposals have been received by the Forest Service to reopen any of these former sites.

S68 Public Concern: The White River National Forest should consider permitting an exclusively Nordic ski area.

Response: Several Nordic ski areas currently operate on the White River National Forest, including: Frisco Nordic Center, Breckenridge Nordic Center, Ashcroft Ski Touring, Copper Mountain, McCoy Park, and Sunlight Mountain Resort. All of these areas provide groomed trails and base area facilities for Nordic skiing. The Spring Gulch Nordic operation on private land near Carbondale provides cross-country skiing opportunities on the west half of the Forest.

Ski-based Resort Planning and Permits

S69 Public Concern: Vail Resorts should disclose all development plans and mitigation measures for the Gilman tract.

Response: This concern is outside the scope of the Forest Plan. The Forest Service has no jurisdiction over private property. The Commissioners of Eagle County have authority to regulate developments on private lands, such as the Gilman tract.

S70 Public Concern: The White River National Forest should explain why Vail's Management Area Prescription for Commando Bowl remains 8.25 in all Alternatives.

Response: The FEIS was revised to include a new alternative, Alternative K. Under this new alternative Commando Bowl is allocated to the 5.5 Forest Carnivore Habitat Management Prescription. Opportunities to provide developed skiing would not be allowed in Alternative K and this area would no longer be included within Vail's ski area boundary.

S71 Public Concern: The White River National Forest should re-categorize Arapahoe Basin.

Response: The White River National Forest does not have a classification system for ski areas. It is not within the scope of the Forest Plan revision analysis to evaluate whether or not Arapahoe Basin has the resources to promote tourism outside the state of Colorado.

S72 Public Concern: The Forest Service should clarify the status of the Aspen Skiing Company's Resource Management Plans as a Forest Plan compliant document.

Response: The resource management plans prepared for the Aspen Skiing Company are required to comply with Forest Plan direction (DEIS, 3-299-301). If conflicts exist between the White River Forest Plan and ski area resource management plans, the Forest Plan will take precedence. For example, new management direction pertaining to lynx habitat must now be incorporated into all existing planning documents.

S73 Public Concern: The Forest Service should approve the proposed Buttermilk/Aspen Highlands Master Plan.

Response: This concern is outside the scope of the Forest Plan. Modifications or revisions to the Aspen Highlands Buttermilk master development plan would require a separate, site-specific planning process.

S74 Public Concern: The Forest Service should increase ski area permit fees and use the funds for projects that protect the forest.

Response: This concern is outside the scope of the Forest Plan. Congress established the parameters for calculating ski area permit fees owed to the government. This Congressional direction can be found in the Omnibus Parks and Public Lands Management Act of 1996 (16 U.S.C. 497c, Ski Fee Bill, also FSH 2709.11-99-2 Washington Office Amendment.

S75 Public Concern: The White River National Forest should continue the outfitter/guide cross-country permit for McCoy Park.

Response: This concern is outside the scope of the Forest Plan. Permit approval is addressed at the site-specific NEPA analysis process. However, Alternative K of the FEIS would allocate the 8.25 management prescription to McCoy Park. This prescription allows both Nordic and alpine facilities.

Skier Recreation Use/Demand Trends

S76 Public Concern: The White River National Forest should clarify the methods and sources used to forecast skiing trends.

Response: Skiing forecasts for the White River National Forest in the DEIS were based on historic use levels projected into the future. Forecasts have been revised based on new information presented in the FEIS, Chapter 3, Part 2 – Ski Areas, Skier Visit Forecast Section. Skier trends, demographic trends and the contribution of skiing and tourism to the local economy are documented in the FEIS. The National Ski Areas Association provided data on skier market trends and information was also incorporated from the Colorado Ski Country USA 1997/98 Profile of Colorado Skiing. Census 2000 and the Colorado State Demographers Office provided data on population projections for the White River National Forest and the Denver Metro area.

S77 Public Concern: The Forest Service should adopt a plan to accommodate a doubling of the recreational population.

Response: This is within the range of alternatives considered. Alternative E was designed to address a doubling of current recreational use. On the other hand, Alternative

K was designed based on demographic projections out to year 2010. Recreational use was not anticipated to double during this time frame based on these projections.

S78 Public Concern: The Forest Service should consider current and future projections of user growth and demands prior to expansion of ski area decisions.

Response: Population growth forecasts for 2010 prepared by the Colorado State Demographer based on the 2000 Census were used as the basis for determining future needs. Current statutes require the Forest Service evaluate a range of alternatives in response to future needs. User demand is only one of the factors used to develop the range of alternatives.

S79 Public Concern: Table 3-89 in the Draft EIS should be amended to reflect actual use at Aspen Mountain and Snowmass.

Response: Table 3-89 from the Draft EIS has been removed for the Final EIS. Area capacities are discussed in the FEIS, Chapter 3 Part 2 – Ski Areas, Table 89, Annual Use and Capacity in 2001.

S80 Public Concern: In ski area planning, the Forest Service should take into consideration both summer and winter recreational demand trends.

Response: The Forest Service encourages public use of ski area facilities during all seasons of the year, especially when the proposed uses enhance natural resource-based recreation opportunities. Riding ski lifts for scenic viewing, mountain biking, horseback riding, nature interpretive programs, and walking are examples of natural resource-based recreation activities that are appropriate on National Forest System land because they do not require the construction of additional facilities.

S81 Public Concern: The White River National Forest should not restrict summer use of ski slopes.

Response: Constraints to summer uses of ski slopes are typically discussed in site-specific environmental analysis documents, area master development plans, and summer operating plans for individual ski areas. The programmatic context of a forest plan generally is limited to setting broad guidelines for making decisions through the site-specific process. The 2002 Forest Plan states: "Facilities may be intensively used throughout the year to satisfy a variety of seasonal recreational demands". Project level planning may restrict uses in specific areas at each ski resort if there are limiting factors that necessitate use restrictions. Resource concerns, such as soil, water, and wildlife may result in some restrictions at the site-specific level.

S82 Public Concern: the White River national Forest should permit ski areas to extend their seasons depending on traffic and snow levels.

Response: The ski area operator selects the length of the operating season. It is typically based on historic weather patterns, skier use levels, and availability of seasonal employees. If there are limiting environmental factors to the use season such as the availability of water for snowmaking or wildlife constraints, they are addressed in site-specific NEPA analysis.

S83 Public Concern: The ski areas should institute a reservation system to limit skier density.

Response: The Forest Plan is a programmatic document primarily designed to make land allocation decisions. If implemented these are operational considerations that are addressed in individual safety and operating plans. If a ski area proposes to institute a reservation system to limit skier densities on National Forest System lands the Forest Service would analyze the proposal using the site-specific NEPA process. If a reservation system were allowed in the future it would have to be implemented in a manner that would assure that it was in compliance with Forest Service discrimination policies based on place of origin and other factors. The Forest Service has no policies that give direction on skier densities, reservation systems, or limits on use.

S84 Public Concern: The Forest Service should conduct an analysis of the need for certain types of ski terrain based on regional availability.

Response: The revised skier visit forecast outlined in the FEIS, Chapter 3 Part 2 Ski Areas, Skier visit Forecast Section, analyzed skier visit growth on a regional basis based on statewide demographic trends. The Forest Service analyzed skiable acres available on the White River National Forest Ski areas and projected additional skiable acres needed by 2010 in the FEIS, Chapter 3 – Ski Areas, Environmental Consequences, Future Needs section. The Forest Service did not analyze trends in demand for specific types of terrain in the FEIS. Over time there has been an evolution in the types of terrain desired by various market segments. Changes in lift technology, grooming equipment, shapes and lengths of skis, increased popularity of snowboarding, and improved snowmaking are some of the examples of technology and equipment changes that have taken place in recent years that have also resulted in the need to revise estimates pertaining to the need for certain types of ski terrain based on regional availability. Because the types of ski terrain that are considered to be desirable continue to evolve in the marketplace the Forest Service did not analyze regional trends in demand for specific types of terrain. It is assumed ski areas that retain some flexibility in the types of opportunities they can provide in the future will be more responsive to changing market conditions.

S85 Public Concern: The Forest Service should review the connection between skier density and lift ticket prices.

Response: The Forest Service has not taken a direct role in the area of ticket pricing, and as such, this issue is outside the scope of the Purpose and Need of this Environmental Impact Statement. In the FEIS, Chapter 3– Ski Areas, Skier Density, Table 88 displays skier densities for the 2000-2001-ski season. This table is used for estimating crowding at ski areas based on the number of acres developed for skiing and number of annual visits. Skier densities vary within ski area boundaries based on the time of day and location of ski lifts and other ancillary facilities. Skier densities are generally highest at primary portal areas that provide access and egress during early morning and late afternoon hours. On other portions of most mountains mid-day concentrations of users are more obvious near restaurants. Skier densities on specific ski trails vary by time of day, lay-of-the-land, and level of difficulty. The United States Congress encourages competition between businesses (ski areas) by allowing competition to adjust ski ticket prices in response to market conditions based on the principles of free enterprise. Although, under the Colorado Overview section, there is mention of heavily discounted season passes that

were introduced during the 1998-1999-ski season, no analysis was done in the FEIS to identify the relationship between skier density and lift ticket prices or the economic effects that might result from placing centralized federal controls on pricing. The Forest Service recognizes there is a relationship between pricing and a ski area's incentives to increase or decrease skier visits to maintain use at appropriate customer service and management efficiency levels (DEIS 3-305). It appears the relationship between skier density and lift ticket prices is based on the amount skiers and snowboarders are willing to pay for a daily skiing experience within a free market economy. It is also generally assumed most skiers are willing to accept higher skier densities in exchange for reduced prices.

S86 Public Concern: The Forest Service should incorporate regional and national demographic trends into the prediction model for skier visitation.

Response: A revised skier visit forecast based on national and regional demographic trends was developed for the FEIS and is found in Chapter 3, Part 2 – Ski Areas, Environmental Consequences and Future Needs sections. Census 2000 data provided information on national demographic trends. The Colorado State Demographer's Office provided data on Regional Demographic Trends and future projections.

S87 Public Concern: The Forest Service should provide data supporting their statements regarding changes in the age demographics of the skiing public.

Response: Please refer to "Colorado Ski Country USA 1997/98 Profile of Colorado Skiing (June 1998)" and the "National Ski Areas Association Demographic Study, Final Report 1998/99 (September 1999)". Ski Area Management magazine published an article by Jim Spring entitled, "Older, Richer and Skiing More Often (July 1997)", which documents trends of older skiers as well. The Colorado State Demographer's Office provided demographic projection data for the state of Colorado. Information contained in these documents was considered during the analysis of both the Draft EIS and Final EIS and are included in the Administrative Record.

S88 Public Concern: The Forest Service should adopt Alternative D as a reasonable means to address public skiing needs.

Response: Alternative D was one of the alternatives considered in the FEIS. A variety of other alternatives were also analyzed. Alternative K addresses public skiing needs by being responsive to increases in population as forecast by the Colorado State Demographer based on the 2000 Census.

S89 Public Concern: The Forest Service should explain how the skiing restrictions of Alternative D conform to the MUSYA, NFMA, and implementing regulations.

Response: The Forest Service is required to evaluate a reasonable range of alternatives under NEPA. Alternative D was one of several alternatives considered in the FEIS.

S90 Public Concern: The WRNF should ensure that the public demand for the full spectrum of skiing experiences is met regionally, rather than at each resort.

Response: The revised skier visit forecast outlined in the FEIS, Chapter 3 Part 2 Ski Areas, Skier visit Forecast Section, analyzed skier visit growth on a regional basis based on statewide demographic trends. The White River National Forest analyzes ski area development proposals on an individual basis while considering these regional trends.

S91 Public Concern: The Forest Service should reconsider their claim that snowmaking boosts skier visitation.

Response: The commenter is referring to a statement in the Beaver Creek Snowmaking Environmental Assessment Report. This project was subject to a site-specific environmental analysis and approved in a Decision Notice signed in 1998. Therefore, this concern is outside the scope of this Forest Plan Revision process.

S92 Public Concern: The Forest Service should prohibit discrimination against snowboarding on Aspen Mountain.

Response: Snowboarding is allowed on Aspen Mountain.

Adequacy of Analysis

S93 Public Concern: The White River National Forest should generate an accurate winter sports analysis.

Response: The White River National Forest revised the FEIS, Chapter 3- Ski Area analysis in response to this comment. Data from the ski areas was updated from the 1996/1997-ski season to the 2000/2001-ski season to reflect changes in skier visits, skiable acres, capacity, and skier densities. A new alternative (Alternative K) was developed and analyzed for the FEIS. In addition, a revised skier visit forecast was developed using Census 2000 data and demographic projects from the Colorado State Demographer's Office.

S94 Public Concern: The Forest Service should evaluate whether ski area expansion results in irreversible commitment of resources on a site-specific basis.

Response: This concern is outside the scope of the Forest Plan. The Forest Service uses a tiered planning approach to ski area planning. The Forest Service does analyze site-specific proposals for each area allocated to the 8.25 Management Prescription using the National Environmental Policy Act of 1969 (NEPA) planning process before development is approved. It is during this site-specific analysis phase that a determination is made regarding irreversible commitments of resources.

S95 Public Concern: The Forest Service should correct inaccuracies in the DEIS.

Response: The DEIS analysis was re-evaluated in completing the FEIS (see Chapter 3, Part 2 – Ski Areas section) and the 2002 Forest Plan in response to this concern. A new alternative K was created and new skier forecast based on population growth was analyzed.

S96 Public Concern: The FEIS should include language clarifying the distinction between Management Areas 8.21 and 8.25.

Response: Descriptions of the 8.21 and 8.25 management prescriptions are contained in the 2002 Forest Plan (Chapter 3, Management Area Direction, Management Areas 8.21- Recreation Complexes and 8.25- Ski Areas). The 8.21 Management Prescription allows for a variety of recreation opportunities in highly developed recreation complexes that typically include campgrounds, day-use areas, marinas, trailhead parking areas, winter or summer trails, and other intensively developed recreation facilities. The 8.25 Management Prescription allows the private sector to provide opportunities for developed skiing and snowboarding on National Forest System lands for large numbers of visitors in

highly developed settings. Ski lifts, restaurants, and other ancillary facilities owned by the ski area operator that were developed for skiing may also be used during other seasons of the year.

S97 Public Concern: The Forest Service should explain how limited skiing terrain leads to generic ski trail design.

Response: When terrain is limited there may be less incentive for resorts to satisfy small niches or special interest groups within the broader market base because the available capacity is more likely to be filled. There is less competition, less need for marketing, and less opportunity for segregation of user types because the primary incentive for most resorts would be to meet the needs of the most profitable segments of the market. There may be less incentive to satisfy lower paying customers and smaller segments of the overall skier and snowboarder market and less incentive to retain some areas as open space or forested areas that are closed to skiing. If a surplus of terrain is available there may be more opportunity to experiment with different types of trail design or silvicultural treatments, meet the needs of special interest groups, provide more variety of the products offered (ski trails), provide loss-leaders, and allow for a greater variety in the spacing and design of ski trail interstices.

S98 Public Concern: The Forest Service should conduct a site-specific analysis of each expansion request.

Response: The Forest Service conducts a site-specific analysis of each expansion request based on the requirements of the National Environmental Policy Act of 1969 (NEPA) prior to granting approval of new facilities. The NEPA planning process requires public involvement throughout the planning process. It also requires the Forest Service consider a range of alternatives in addition to the proposed action.

S99 Public Concern: The Forest Service should acknowledge that ski area expansion attracts, rather than accommodates, more skiers.

Response: Free enterprise encourages competition between resorts and allows for changes in market conditions based on economic opportunity and freedom of choice. The addition of new terrain or improved facilities by one resort in Colorado may indeed result in a change in visitor preferences at the local, regional, national, or international level by attracting either new or existing skiers. The Forest Service evaluates opportunities for developed skiing and snowboarding on National Forest System lands based on the evaluation of specific proposals submitted to the Forest Service for approval. Each proposal is analyzed based on natural resource conditions and the carrying capacity of individual land units. As long as permit holders operate within the parameters of their resource management plans the Forest Service allows the free market to determine attractiveness based on appropriate levels of use, pricing, and skier densities.

S100 Public Concern: The Forest Service should expand its cumulative effects analysis for winter recreation.

Response: The winter recreation cumulative effects analysis for the FEIS was revised in response to this concern (Chapter 3, Part 2 – Ski Areas, Cumulative Effects section). A wide range of alternatives were considered in the DEIS and a new Alternative K was analyzed in the FEIS. A new skier forecast was also added in the FEIS in response to the findings of the 2000 Census. The FEIS looked at user experience, access to huts, future

growth in skiing verses snowmobiles by category, and winter access points as issues. The ten predominant recreation uses on the White River National Forest are shown in Chapter 3, Recreation Section of the FEIS.

S101 Public Concern: The Forest Service should consider the indirect and cumulative effects of ski area expansion.

Response: Direct, indirect, and cumulative impacts are all addressed within each resource topic area. Additionally, Chapter 2 in the DEIS displays numerous tables which comparatively display the effects of all of the alternatives, in which different levels of ski area expansion are represented.

S102 Public Concern: The Forest Service should explain the purpose of table 3-89.

Response: Table 3-89 of the DEIS has been removed from the FEIS.

S103 Public Concern: The White River National Forest should reevaluate the future growth potential of Arapahoe Basin Ski Area.

Response: The future growth potential for an individual ski area, like Arapahoe Basin, is addressed in site-specific plans after a development proposal is received. A new analysis was completed for the FEIS that forecasts future skier visits based on increases in population. This information is based on data obtained from Census 2000.

S104 Public Concern: The Forest Service should develop a framework with master guidelines and principles against which pressures for expansion are analyzed relative to ecosystem goals.

Response: Pressures for expansion are most likely to come from an increase in population. Colorado was the third fastest growing state in the country between 1990 and 2000 and is expected to continue to grow rapidly through 2010. The 2002 Forest Plan will provide the framework for future ski area expansions by identifying acres of National Forest System lands suitable for skiing through allocation of the 8.25 management prescription. Master guidelines are identified as forest-wide and management area standards and guidelines, as well as, forest-wide goals and objectives. Proposals submitted to the Forest Service are analyzed using the NEPA planning process to determine their relevance to ecosystem goals.

S105 Public Concern: The Forest Service should explain how ski areas expand without increasing capacity.

Response: It is not unusual for the Forest Service to allow an increase in skiing terrain without creating a corresponding increase in daily capacity. For example, Category III, Blue Sky Basin, allowed Vail to add 4,100 acres to the ski area with approximately 1,000 acres of new skiable terrain without adding additional daily capacity to the ski area. Highlands Bowl at Aspen Highlands is another area that added a significant amount of terrain without a corresponding increase in capacity. The daily capacity for Vail and Aspen Highlands and most other ski areas is restricted based on parking, delivery constraints, ski lift capacities, and other out-of-base limitations. When additional lifts or terrain are added to sections of the upper mountain or back bowls of some ski areas this allows the same number of skiers to disperse in lower densities over a higher number of acres without increasing daily capacity.

S106 Public Concern: The Forest Service should revise the discussion of capacity and operating season days for the ski resorts of the White River National Forest.

Reponses: The Forest Service selected the most current data available at the time the environmental impact analyses was prepared. The FEIS reflects all changes deemed necessary as they relate to ski area capacities and operating season days.

S107 Public Concern: The Forest Service should identify the environmental resource data justifying the proposed ski area restrictions in Alternative D.

Response: A range of alternatives was considered in the DEIS. Wildlife and the protection of wildlife habitat would be assigned a higher priority than recreation in Alternative D. Conflicts between humans and wildlife would be resolved in favor of wildlife. In Alternative D recreation use and skiing were not considered to be desirable activities because they were perceived to have negative effects on wildlife and wildlife habitat. Reference Chapter 3, Affected Environment and Environmental Consequences, Air, Water, Wildlife, Soil sections of the FEIS to view the environmental resource data and potential environmental effects resulting from implementation of Alternative D.

Market

S108 Public Concern: The Forest Service should develop a programmatic EIS to address the interconnectedness of the regional and national ski market.

Response: The Regional Guide, Rocky Mountain Region (Region 2), was prepared as a programmatic regional document that established priorities for Winter Sports Sites in Colorado and Wyoming. This document was updated in 1992. It prioritizes a list of potential expansion sites for skiing. If the Regional Forester updates the Regional Guide, national and international interconnectedness could be evaluated within that process. This information is in the administrative record.

S109 Public Concern: The White River National Forest should reconsider their statement that Denver International Airport is "contributing to an increased demand for skiing in Colorado."

Response: A high percentage of visitors to Colorado resorts arrive via airplanes. Changes in pricing and flight opportunities do influence skiing and overall tourism participation. Support for this assertion can be found in Frick (1997) An Analysis of Economic Trends in the White River National Forest Region, BBC Research and Consulting, Denver, CO. "The White River National Forest region and the Western Slope of Colorado has experienced rapid economic growth as a result of many factors, including electronic technology, improved access, notably Denver International Airport". Also refer to the Vail Daily (1/5/98) Inaugural German flight carries hundred(s) of skiers to Colorado. "The first non-stop flight from Germany to Denver International Airport delivered nearly 200 passengers to Colorado's ski slopes Saturday." This information is contained in the administrative record.

S110 Public Concern: The Forest Service should provide marketing surveys on which statements regarding ski resort selections are based.

Response: Reference: Rosall, 1998. NSAA End of Season Survey, 1997/98. RRC Associates, Boulder, CO; 1998 Ski Magazine Reader Survey; Spring, 1999, "Why the Ski

Industry is Treading Water", Ski Area Management magazine; Spring 1998, "Subtle but Important Shift in Customers", Research from the National Skier/Boarder Opinion Survey, Ski Area Management magazine, Jim Spring, President, National Skier/Boarder Opinion Survey. This information is in the administrative record.

Skier Visitation Days

S111 Public Concern: The White River National Forest should clarify the basis for its projections of future skier recreation visitor days.

Response: This concern was taken into consideration in the FEIS. Skiing forecasts for the White River National Forest in the DEIS were based on historic use levels projected into the future. However, a revised forecast was developed for the FEIS by using: skier use trends, demographic trends, and the contributions of skiing and tourism to the local economy. The National Ski Areas Association and Colorado Ski Country USA 1997/98 Profile of Colorado Skiing provided data on skier market, Census 2000 and the State Demographers Office provided data on population projections for the White River National Forest and the Denver Metro area. This information is in the administrative record.

S112 Public Concern: The Forest Service should consider the effects of a changing environment on skier visitation.

Response: Weather trends indicating a warming of the earth's climate is acknowledged in the FEIS (Chapter 3, Part 2 – Ski Areas, Climate Change section). These weather trends are a factor considered in the projections of future skier visitation.

S113 Public Concern: The White River National Forest should develop an accurate measure for daily skiers at one time (SAOT).

Response: This concern is outside the scope of the Forest Plan. Daily use capacities are determined when the master development plans for specific areas are updated. The Forest Service utilizes the best available information at the time of analysis. Daily capacity is used as a financial and land-use-planning tool. The daily capacity for each area is calculated individually based on its own unique characteristics. A one-size-fits-all formula for calculating daily capacity would be difficult if not impossible to impose on all ski area operators. The Forest Service documents the approved daily capacity in a site-specific analysis. This figure is generally included in the master development plan prepared by each ski area. Night skiing and other factors do need to be considered when calculating daily or seasonal use.

S114 Public Concern: The Forest Service should distinguish between estimated and actual skier numbers.

Response: Actual skier use numbers from past years are shown in the FEIS Chapter 3, Part 2- Ski Areas. Each ski area is required to provide the Forest Service with actual ski use data and associated revenues. The Forest Service audits this information for accuracy and completeness and calculates the effect of season passes, complementary tickets, and night skiing to assure accuracy in reporting. This information is also subject to review by the Internal Revenue Service. The audited skier use numbers are public information that is released by Colorado Ski County at the end of each ski season. Estimated skier use

figures used to forecast (estimate) future use for 2010 are based on the Colorado State Demographers population predictions.

S115 Public Concern: The White River National Forest should recalculate annual skier days to take into account the number of days attributable to snowmaking.

Response: The White River National Forest did not calculate skier days attributable to snowmaking since reliable data is not available. Skier visits at individual resorts vary annually due to differences in natural snow, marketing trends, or factors other than snowmaking. To distinguish the number of skier days attributable to snowmaking would be questionable at best. Many ski areas choose to close at the end of the end season due to lack of customers, and not a lack of snow.

Skier Densities and Ski Area Capacity

S116 Public Concern: The White River National Forest should disclose the changes in skier densities between 1987 and 1996.

Response: In the FEIS, Chapter 3 – Ski Areas, Skier Density section, Table 88 displays skier densities for ski areas on the White River National Forest for the 2000-2001 ski season. This is information is displayed as skiers per acre per year. This information is an indication of crowding and a measure of current skiing quality. Installation of high speed express detachable chairlifts at most ski areas changes the relationships between the number of skiers waiting in lift lines, skiers riding on lifts, and skiers on the slopes at one time. If comparisons are needed to disclose changes in density between 1987 and 1996 they will be analyzed for individual ski areas based on site-specific proposals.

S117 Public Concern: Because of improved lift technology since 1997, the WRNF should disclose changes in daily capacity up to the year 2000.

Response: In the FEIS, Chapter 3 – Ski Areas, Capacity section, table 86 displays the capacity of ski areas on the White River National Forest between 1987 and 2000. These capacity figures were taken from existing master development plans and winter operating plans for the 2000-2001-ski season.

S118 Public Concern: The Forest Service should clarify the definition of "practical carrying capacity."

Response: This concern was taken into consideration in the FEIS. All reference to "practical carrying capacity" has been eliminated as this was considered confusing to most readers.

S119 Public Concern: The Forest Service should clarify whether it is discussing annual or practical annual capacity in table 3-85.

Response: This concern was taken into consideration in the FEIS. Table 3-85 in the DEIS displays the "Practical Annual Capacity" in relation to the number of tickets sold during the 1996-97 ski season. This has been modified in the FEIS to show annual capacity for the 2000-01 season and all reference to "practical annual capacity" has been eliminated since the concept was confusing to some readers.

S120 Public Concern: The Forest Service should not limit practical annual capacity at the White River National Forest ski areas -and-

S121 Public Concern: The Forest Service should use practical annual capacity only as a planning tool.

Response: In the FEIS, all reference to "Practical Annual Capacity" has been eliminated since this concept proved confusing to some readers. The DEIS does not suggest that the ski areas are limited to the referenced "Practical Annual Capacities," nor does it provide any direction on any procedures that would limit ski areas to their stated daily or annual SAOT capacities. The Forest Service uses practical annual capacity calculations only as a planning tool to make comparisons between resorts.

S122 Public Concern: The White River National Forest should reevaluate the available capacity of Arapahoe Basin.

Response: The Skier visit forecast for the White River National Forest was re-evaluated in the FEIS. As shown in the analysis (Chapter 3, Part 2 – Ski Areas, Skier Visit Forecast) most of the growth in skier visits on the White River National Forest is anticipated to occur within Summit County between 2000 and 2010 based on the Colorado State Demographer's population forecast. The Forest Service allocated additional acres of skiable terrain to Arapahoe Basin ski area in the FEIS based on this forecast. If a proposal to provide additional opportunities for developed skiing and snowboarding is submitted to the Forest Service for approval in the future it will be addressed in a site-specific NEPA analysis before approval is given.

S123 Public Concern: The White River National Forest should develop an accurate and consistent measure for ski area capacity.

Response: The master development plan for each ski area is the guiding document for describing which lands are suitable and their capacities (DEIS 3-307). Master development plans typically go through an intensive public scoping and NEPA process, including interdisciplinary review, and local governmental review. Capacities for each ski area frequently have different variables acting as capacity determinants. Examples include initial lift out-of-base delivery capacity, transportation to the site, parking, physical characteristics of terrain, catwalks and bottlenecks, predominant personal equipment types and skill levels, and terrain accessibility, to name a few. These are just some of the variables that may dictate different capacity calculations for any given ski area. The Forest Service does not intend to impose uniform federal standards on individual ski areas for calculating ski area capacity. Methods for calculating capacity have evolved over the years in response to changes in lift and personal equipment technologies and site-specific management objectives. In most locations the installation of high-speed express detachable chairlifts over the last decade influenced skier use patterns and altered the relationships between the times each skiers spends riding lifts, sliding downhill, and waiting in lift lines, that were previously used to calculate ski area capacity. Snowboarding is another relatively new phenomenon that significantly changes skier use patterns, circulation, and terrain type preferences on most mountains. In recent years changes to skiing equipment has also allowed many skiers to seek out different types of physical terrain, more difficult terrain, and powder snow that were previously

not considered difficult to ski. In combination, all of these factors have caused ski areas to reconsider previous methods for estimating capacity. Ski area capacity is determined for each site through detailed analysis at the project level and disclosed to the public in individual NEPA analysis documents. The Forest Service is willing to consider a variety of methods for calculating ski area capacity as long as they are easily understood and provide reasonable estimates of proposed use.

S124 Public Concern: The Forest Service should reconcile its conflicting statements regarding calculation of practical annual capacity.

Response: This concern was taken into consideration in the FEIS. All reference to "practical carrying capacity" has been eliminated as this was considered confusing to most readers.

S125 Public Concern: The White River National Forest should establish a management goal for lift line length.

Response: This concern is outside the scope of the Forest Plan. Management goals regarding lift line length are unique to each ski area. They are determined at the discretion of individual resort owners and administrative representatives based on site-specific circumstances. They are subject to changes in the ski industry as new technology and market conditions evolve. Because weather conditions are ephemeral on ski areas some lifts may be more attractive during short periods of sunshine, powder snow, high winds, or extreme weather temperatures. Lift line length is one of many concerns and elements of the ski area planning process. The Forest Service allows flexibility in lift-line lengths in response to planning and management considerations, special terrain features, lift types, and experiential effects that are unique to individual ski areas. The Forest Service has not dictated that all ski areas adopt a uniform federal standard for this detailed planning element.

Part 3—Aerial Transportation Corridors

S126 Public Concern: The Forest Service should prohibit construction of aerial trams connecting ski areas.

Response: Numerous opportunities were identified and analyzed in Alternatives E and F. Although no aerial transportation corridors were allocated in Alternative B, C, D, I and K, they are not prohibited from being analyzed in the future. If an aerial transportation corridor is proposed in the future the Forest Service will analyze the purpose and need for the action, alternatives to the proposed action, and consider potential environmental, social, and economic effects that may result from development. The purpose of the 8.31 management prescription is to identify locations where it may be desirable to transport pedestrians to, from, or between locations that require the use of National Forest System lands. As transportation and parking issues become more important in the future some resort communities may decide to more fully explore alternative transportation systems such as aerial trams. It is anticipated the analysis of the I-70 corridor by CDOT that is currently taking place will stimulate some public interest in this topic by identifying a variety of possible new locations for internodal transportation centers where traditional asphalt roadways, fixed rail systems, monorails, ski lifts, and parking can be integrated and concentrated in the same locations. The 2002 Forest Plan would have to be amended to assign the 8.31 management prescription to the area affected by the proposal prior to allowing construction.

S127 Public Concern: The White River National Forest should permit construction of aerial trams connecting ski areas.

Response: The Forest Service analyzed the effects of aerial transportation corridors on National Forest System lands in Alternatives E and F in the FEIS. If a new proposal to construct an aerial tram on National Forest System lands is received by the Forest Service in the future it will be analyzed using the NEPA planning process at the site-specific level. The Forest Service will consider the purpose and need, alternatives to the proposed action, and analyze the environmental, social, and economic effects of the proposal. If the proposed action were approved, the 2002 Forest Plan would have to be amended before the facility could be constructed. If the proposed aerial tram is owned, operated, or proposed for development by an entity other than a ski area to be used as an alternative form of transportation for pedestrians in place of a paved road, the 8.31 management prescription would be assigned. If the purpose and need for the proposal were to improve skier circulation or provide increased access to more skiing terrain for skiers and snowboarders, the 8.25 management prescription would be assigned. A variety of ski lift types including trams and gondolas are appropriate in the 8.25 management prescription. Aerial trams, gondolas, cabriolets, and ski lifts that are owned and operated by a ski area as part of an integrated skiing operation on public and private lands are assigned the 8.25 management prescription.

S128 Public Concern: The White River National Forest should consider permitting aerial tramways in a broader transportation context.

Response: Aerial tramways were not considered in a broader transportation context for the FEIS. A transportation plan for the Forest will be completed after release of the 2002 Forest Plan. The Colorado Department of Transportation, in conjunction with the Federal Highway Administration, is working on an I-70 Mountain Corridor PEIS to address alternative systems in a broader transportation context. This programmatic EIS will analyze transportation needs along the I-70 corridor in a broader context. The corridor plan will identify potential interchanges and linkages with other transportation routes and systems. The Forest Service is a consulting participant in this process. Please refer to www.i70mtncorridor.com.

S129 Public Concern: Aerial tramways should be allowed only where they are consistent with the management area prescriptions they traverse.

Response: Several aerial transportation corridors are identified in Alternatives E and F. If the Forest Service accepts a proposal for review it will be analyzed in detail in a site-specific NEPA document to determine if the proposal is consistent with the adjacent management prescriptions. If considerations unique to a specific proposal require changes to the 2002 Forest Plan standards and guidelines or unique mitigation measures to reduce impacts to adjacent land areas they can be addressed in the site-specific NEPA analysis.

S130 Public Concern: The Forest Service should consider alternative routing for the gondola between Aspen Highlands and Buttermilk.

Response: Alternative F of the FEIS analyzed a gondola alignment between Aspen Highlands and Buttermilk. Other corridors that may be suitably located on private lands are not included in the Forest Plan analysis. The Commissioners of Pitkin County have

jurisdiction over private lands between Aspen Highlands and Buttermilk that may be affected by other alternative corridors.

S131 Public Concern: The White River National Forest should confer a Management Area designation of 5.43 between Buttermilk and Snowmass.

Response: The Owl Creek area between Buttermilk and Snowmass is allocated to the 8.25 management prescription (alpine and Nordic skiing) in the 1984 Forest Plan. The management prescription for this area under Alternatives C, D, I, F, K is 5.43 (Elk habitat) in the 2002 Forest Plan. The intent of the 5.43 management prescription is to manage elk habitat. Management areas with this prescription are characterized by low road densities and optimum forage and cover ratios. The Owl Creek area has been extensively studied in the past and has characteristics that make the area ideally suited for elk. Most human uses are limited and some travel closures may exist based on elk habitat objectives. Winter use by elk between December 1 and April 14 results in human use restrictions for the entire ski season.

S132 Public Concern: The White River National Forest Plan amendment should comply with the management area prescription for Burnt Mountain designated in the Snowmass Ski Area Record of Decision, including consideration of an aerial tramway.

Response: The 1994 Record of Decision for the Snowmass Ski Area states, "Based on the analysis disclosed in the FEIS, Burnt Mountain, Snowmass 1994, I believe the more appropriate Forest Plan management area prescription for this land (Burnt Mountain) is 4B - management emphasizing the habitat needs of the one of more management indicator species. Formal adoption of this management area prescription will not occur until completion of the Forest Plan revision (pg. 20, 1994 Snowmass ROD)". The management prescription for this area is 5.43- Elk habitat under Alternatives D, F, I and K. Alternatives D, F and I in the DEIS do in fact take into consideration, and fully analyze the Burnt Mountain terrain as a 5.43 management prescription area (Elk Habitat). Motorized and mechanized travel is not allowed outside of designated routes during snow-free periods in this management prescription, except when authorized for administrative or emergency purposes. Human activities are restricted to avoid disturbances to elk during the following time periods: May 15 to June 20; October 15 to November 30; December 1 to April 14; and June 16 to October 14. Operation of a gondola during these time periods may be inconsistent with the standards and guidelines for the 5.43 management prescription. Developed skiing and ski area facilities are not allowed in a 5.43 management area. If a proposal to develop this area for skiing were submitted to the Forest Service for skiing, the proposal would be analyzed in a site-specific NEPA analysis and the 2002 Forest Plan amended to identify the area to be included within the 8.25 management prescription before construction could be allowed. The purpose and need for a skiing proposal and evidence of strong public support are important considerations for allowing these types of facilities on National Forest System lands. Both the 8.25 and 8.31 management prescriptions can be allocated as narrow rights-of-way or as a replacement for the area allocated to the 5.43 management prescription in Alternative K.

S133 Public Concern: The purpose and need for aerial transportation corridors should be determined through the EIS process.

Response: The Forest Plan revision has been conducted through an EIS process that included analysis of aerial transportation corridor possibilities. Many of the aerial transportation corridors proposed in the DEIS were discussed previously in community forums or were documented in ski area plans. All of the alternatives have some historical basis. Reference: Town of Minturn Community Plan (1998), Town of Avon Transportation Plan Update (1996). Burnt Mountain FEIS, Snowmass Ski Area (1994) (DEIS pg. 3-351-360).

S134 Public Concern: The Forest Service should resolve conflicts between the proposed ski area and aerial transportation corridor prescriptions and past Forest decisions and agreements.

Response: The Forest Service analyzed the effects of aerial transportation corridors in Alternatives E and F. Potential conflicts that may result from construction of aerial trams on National Forest System lands in Alternatives E and F are disclosed in the Wildlife, Water, and Soil Sections of the FEIS, Chapter 3- Environmental Consequences. No conflicts were identified in Alternatives B, C, D, K, and I because no acres are allocated to the 8.31 management prescription.

S135 Public Concern: The Forest Service should reassess the effects of aerial transportation on traffic, air pollution and infrastructure.

Response: Aerial transportation systems appear to have potential to reduce air emissions, improve pedestrian circulation, and reduce vehicular traffic when compared with private automobiles with internal combustion engines using traditional asphalt roads. If the Forest receives a proposal for an aerial transportation corridor on National Forest System lands in the future the environmental effects would be analyzed using a site-specific NEPA process.

S136 Public Concern: The White River National Forest should clarify the comparison of effects to wildlife between traditional roadway systems and aerial transportation corridors.

Response: The use of railroads was not analyzed in the FEIS. None of the alternatives analyzed in the 2002 Forest Plan identified new corridors for railroads on National Forest System lands. If the White River National Forest receives a proposal for a new railroad corridor on National Forest System lands it would be analyzed at the site-specific level. Railroads in Colorado are generally located on private lands on flatter terrain in valley bottoms at lower elevations where they are outside the jurisdiction of the Forest Service.

S137 Public Concern: The White River National Forest should establish standards and guidelines for wildlife under Management Area 8.31 – Aerial Transportation Corridors.

Response: Each of the corridors identified in the FEIS has a unique set of physical and biological characteristics. If a proposal for an aerial transportation corridor is submitted to the Forest Service in the future it will be analyzed in detail at the site-specific level to determine potential impacts to wildlife and wildlife habitat. If it is determined that standards and guidelines or special mitigations measures are needed to reduce or avoid

harmful effects to wildlife they would be incorporated into the site-specific NEPA analysis and record of decision.

S138 Public Concern: The FEIS should analyze and disclose potential changes in air quality resulting from additional aerial transportation corridors.

Response: There are no existing aerial transportation corridors on the White River National Forest. If the Forest Service receives a proposal for an aerial transportation corridor in the future it will be analyzed in detail at the site-specific level. The Forest Service uses a tiered planning process to analyze, disclose, and compare differences between aerial trams and private automobiles on asphalt roads during the site-specific NEPA analysis phase. If the Forest Service decides to allow an aerial transportation corridor on National Forest System lands in the future, the 2002 Forest Plan must be amended to identify the location and effects of the aerial transportation corridor prior to construction. The forest wide standards and guidelines are located in the 2002 Forest Plan, Section One, physical- air. The Forest analyzed the effects of aerial transportation corridors in Alternatives E and F.

S139 Public Concern: The Forest Service should develop workable Standards and Guidelines for the Management Area 8.31 prescription.

Response: The standards and guidelines that apply to the 8.31 management prescription are contained in the 2002 Forest Plan, Chapter 2, Forest wide Standards and Guidelines, and Chapter 3, Management Area Direction, 8.31 Aerial Transportation Corridors. The Forest wide standards and guidelines are applied uniformly to all National Forest System lands while the 8.31 management prescription standards and guidelines apply only to areas allocated as aerial transportation corridors. Additional standards and guidelines or mitigation measures may be assigned to specific proposals during the site-specific NEPA analysis phase.

S140 Public Concern: The Forest Service should include a standard in the 8.31 Management Area prescription banning recreational use of aerial transportation corridors.

Response: The majority of acres administered by the White River National Forest are open and available for non-motorized dispersed recreation. If there are compelling reasons for banning humans from dispersing into specific areas of the National Forest they will be addressed in a site-specific NEPA analysis in response to a specific proposal. Social, economic, and natural resource concerns that are unique to each proposal will be considered in the site-specific analysis to determine whether or not humans should be banned from entering all or a portion of areas allocated the 8.31 management prescription. The suitability and desirability of designated aerial transportation corridors for dispersed recreation is based on a variety of site conditions unique to each site, including slope gradients, erodability of soils, sensitivity of watersheds, presence of critical wildlife habitat, need to protect cultural resources, public safety, private land trespass, and other issues. If the Forest Service decides to accept and analyze a site-specific proposal for an aerial transportation corridor in the future, the public will be given an opportunity to participate in the NEPA planning process. The Forest Service will review and make adjustments to the standards, guidelines, and mitigation measures as needed to resolve specific issues unique to each proposal during the site-specific NEPA analysis phase.

S141 Public Concern: The White River National Forest should designate 8.31 Management Areas.

Response: The Forest Service may consider allocating aerial transportation corridors in the future, if a specific proposal is received. The purpose and need for the proposal should be clear and community support evident prior to the initiation of a site-specific NEPA analysis.

S142 Public Concern: The Forest Service should take into consideration the CTSB regulations when proposing aerial transportation systems.

Response: In Colorado CTSB is the organization responsible for inspecting, regulating, and enforcing engineering and safety standards for ski lifts. The Forest Service recognizes the authority of this organization and works cooperatively with CTSB to enforce the standards and operating procedures.

S143 Public Concern: The Forest Service should follow the existing mitigation plans for Beaver Creek in the alternative recommendations regarding aerial transportation corridors.

Response: The 2002 Forest Plan contains forest-wide standards and guidelines and management prescription area standards and guidelines. If both standards apply to an area, the Forest Service would apply those standards that are most stringent. All existing previously approved plans for Beaver Creek must be amended to comply with the new 2002 Forest Plan standards.

S144 Public Concern: The White River National Forest should conditionally allow construction of aerial trams.

Response: If a proposal is planned to cross National Forest System lands in the future the Forest Service may consider doing a site-specific analysis, if the purpose and need for the proposal was clearly defined and public support was evident. If a proposal to construct an aerial tram on National Forest System lands were approved by the Forest Service in a specific NEPA document in the future, the corridor would have to be assigned the 8.31 management prescription in an amendment to the 2002 Forest Plan prior to construction.

S145 Public Concern: The Forest Service should use railways rather than aerial transportation to mitigate traffic volume.

Response: Railroads were not addressed as a topic issue in the 2002 Forest Plan. The Forest Service would become involved in the analysis of a railroad corridor if a specific proposal was planned to traverse or border National Forest System lands. The Forest Service would have to amend the 2002 Forest Plan to recognize the proposed use prior to allowing construction of a new railroad on National Forest System lands.

S146 Public Concern: The White River National Forest should reconsider the proposed Aerial Transportation Corridor east of Vail which conflicts with the USFWS Conference Opinion on Vail's Category III Decision.

Response: The Forest Service would take into consideration the USFWS Conference Opinion on Vail's Category III decision if a proposal for an aerial transportation corridor east of Vail were submitted for analysis. Several aerial transportation corridors were analyzed in the FEIS (Alternatives E and F). The idea to access Vail ski area from Shrine Pass/Vail Pass was conceived over forty years ago prior to the development of Vail ski

area, Town of Vail, and construction of Interstate 70. From a landscape and engineering standpoint, it would be possible to provide safe public access to Vail ski area from the east via an aerial tram, if a new portal were constructed in this location. It was originally conceived that direct access via aerial tram could eliminate a large amount of skier traffic on Interstate 70 between Vail Pass and the Town of Vail. Now that lynx is listed as a threatened species the Forest Service must analyze the effects all development proposals would have on this species and its habitat. The Colorado Department of Transportation is currently preparing a PEIS to analyze a variety of transportation alternatives for the I-70 corridor between Denver International Airport and Vail, including monorails, light rail and other alternative forms of transportation other than private automobiles.

S147 Public Concern: The White River National Forest should provide a more specific definition of "reasonable efforts" to limit visibility of ski area facilities.

Response: The Forest Service attempts to respond to the question of whether or not the array of alternatives that are considered in detail provide a reasonable number of practical ways to the meet the stated objectives to some degree while resolving some of the environmental problems associated with the proposal. Reasonable alternatives include those that are practical or feasible with regard to demonstrable economic, social, and ecological needs. The Forest Service uses the NEPA planning process to address the issue of reasonableness when analyzing site-specific proposals for development as required by the National Environmental Policy Act of 1969. Selection of dark non-reflective earth-tone colors for the exterior surfaces of buildings and structures that help the facilities blend with the National Forest summer environment is an example of a mitigation measure that is considered a reasonable solution for limiting visibility of ski area facilities.

Part 4—Scenery

S148 Public Concern: The Forest Service should preserve the natural beauty of the White River National Forest.

Response: It is the intent of the White River National Forest to manage the natural beauty of the Forest. Each of the alternatives has the potential to maintain, alter, or enhance the scenic character of Forest landscapes to varying degrees. (FEIS, Chapter 3 Topic 3, Part 4- Scenery Management) Forest-wide goals, objectives and guidelines along with management area guidelines will provide the framework for managing scenic resources. Additional guidance for management of scenic is resources is outlined in FSM 2380, Landscape Aesthetics, A Handbook for Scenery Management, Agriculture Handbook 701:1995 supplemented by the following:

- National Forest Landscape Management Volume 1. Agriculture Handbook 434: 1973
- Utilities, Chapter 2, Agriculture Handbook 478: 1975
- Range, Chapter 3, Agriculture Handbook 484: 1977
- Roads, Chapter 4, Agriculture Handbook 483: 1977
- Timber, Chapter 5, Agriculture Handbook 559: 1980
- Fire, Chapter 6, Agriculture Handbook 608: 1985
- Ski Areas, Chapter 7, Agriculture Handbook 617: 1984
- Recreation, Chapter 8, Agriculture Handbook 666: 1987

S149 Public Concern: The Forest Service should prohibit commercial timber harvest in areas of high scenic value.

Response: Each management area has a range of scenic integrity objectives (SIO's). The SIO's defines the degree of visible disruption of the landscape character that is allowed when implementing management activities. Scenic Integrity Objectives for any portion of Forest lands are used as a guideline to achieve the desired condition of the landscape as described for each management area. If a management area allows for timber harvesting activities to occur, the potential impacts to scenery must be analyzed and disclosed. The associated activities with timber harvesting should be designed and implemented in a manner that is consistent with the SIO's for a specific area.

A range of scenic integrity objectives has been identified to be compatible with the desired condition of each management area. The scenic integrity levels for the selected alternative will become the scenic integrity objectives used to implement the new Forest Plan. Refer to the FEIS, Chapter 3 Topic 3, Part 4- Scenery Management for a detailed description of scenic integrity levels and objectives. Forest wide and management area specific guidelines for scenic resources can be found in Chapters 2 and 3 of the forest plan.

Beyond the scenic integrity objectives, the Forest has identified areas of outstanding scenic beauty. Management areas 4.2 (scenery) and 4.23 (scenic byways, scenic areas, vistas or travel corridors) were developed specifically to reflect the value of forest scenery. These management areas have specific standards and guidelines to protect or enhance scenic resources that can be found in Chapter 3 of the forest plan.

S150 Public Concern: Scenic integrity levels in Alternative D should correspond with Alternative D's biological diversity objectives.

Response: Management areas are each associated with specific desired future conditions for scenic integrity. These are captured in the standards and guidelines for future allowable activities in specific management areas. (Chapters 2 and 3 of the forest plan)

Desired future conditions for scenic integrity are explicitly linked to specific management area direction regardless of alternative. Alternatives provide an opportunity to assess the effects and tradeoffs between resources associated with allocation of different amounts of land to specific management areas.

Alternative D has an arrangement of management areas that reflect the overall theme of the alternative. With the exception of Alternative F, Alternative D has more management areas that can be managed for low or very low scenic integrity in order to achieve the desired condition of each management area than the other alternatives.

Refer to the Scenery Management System Specialist Report in the administrative record for additional information.

TOPIC 4
ROADLESS AREAS AND RECOMMENDED WILDERNESS

Wilderness Recommendations

W1 Public Concern: White River National Forest should recommend additional roadless areas for wilderness designation.-and-

W1.1 To Preserve Natural Heritage

W1.2 To Preserve Native Plant And Animal Populations

W1.3 To Protect Lower Elevation Ecosystems

W1.4 To Protect All Ecotypes

W1.5 To Protect Native American Heritage Resources

W1.6 To Act As Reference Landscapes

W1.7 To Alleviate Recreational Pressure On Existing Wilderness

W2 Public Concern: The Forest Service's analysis of eligible Wilderness areas is inadequate. – and –

W3 Public Concern: The Forest Service should correct the conflict between wilderness recommendations in alternative D and the stated lack of low-to-mid elevation Wilderness.

Response: The factors considered in evaluating potential wilderness and determining the need to designate roadless areas as wilderness are outlined in Forest Service Handbook (FSH) 1909.12 Chapter 7. Need was evaluated in terms of local and national distribution of wilderness (geographic distribution of areas), representations of landforms and ecosystems, the presence of wildlife expected to be visible in a wilderness environment, and the opportunity to provide primitive outdoor recreation opportunities. (FSH 1909.12.7.23). Additionally, wilderness designation may offer opportunities to preserve native plant and animal habitats and populations, the natural heritage of an area, and serve as reference landscapes. Research Natural Areas and Wild and Scenic River Management Area allocations may offer similar protection opportunities. Native American Heritage Resources are required to be protected under many laws including the Native American Graves Protect and Repatriation Act (1990), the Archaeological Resources Protection Act (1979) and the National Historic Preservation Act of (1966).

The number of roadless acres recommended for wilderness ranges from 0 acres in Alternatives B and F to 200,000 acres in Alternative I (FEIS, Volume 2, Chapter 3, Topic 4 Roadless Area Management, Environmental Consequences). Before recommending an area for wilderness, the decision-maker must consider the need for new wilderness along with a wide-range of multiple use demands on the White River National Forest System lands. The following areas have been found to meet the biological need evaluation and are recommended for wilderness in Alternative K: Dome Peak, Red Dirt, Sweetwater, Red Table and Assignation Ridge.

See FEIS Volume 2, Chapter 3, Topic 4 Roadless Area Management, Affected Environment, FEIS Appendix C, and Administrative Record Needs Assessment (Boyst 2001) for a complete discussion of the evaluation of and need for new wilderness.

W4 Public Concern: The FEIS should recommend a greater amount of roadless area acreage for wilderness designation.

Response: The Final Environmental Impact Statement (FEIS) considers a range of alternatives for wilderness recommendation from the roadless inventory of areas considered capable and available for Wilderness designation. Alternatives B and F recommend no additional acres, while Alternative I recommends 200,000 acres. (FEIS, Volume 2, Chapter 3, Topic 4 Roadless Area Management, Environmental Consequences)

FSH 1909.12.7.2 directs that for an area to be recommended as Wilderness, it must be inventoried roadless and considered capable and available for wilderness designation. Capability is defined as "the degree to which that area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness." Principle wilderness characteristics include: environment, challenge, outdoor recreation opportunities, special features, and manageability (FSH 1090.12.7.21). "The determination of availability is conditioned by the value of and the need for the wilderness resource compared to the value of and need for other resources (FSH 1909.12.7.22)." Many of the acres of the White River National Forest are roaded or have some other type of development that precludes them from being capable of wilderness designation. Constraints and encumbrances on lands, as well as, a wide range of demands for multiple resources may preclude the availability of areas evaluated to be capable for wilderness designation. While approximately 300,000 acres are eligible for recommendation as Wilderness, the forest plan Interdisciplinary Team considered all of the resource needs and recommended that at most 200,000 acres be considered for Wilderness in any one alternative.

W5 Public Concern: The Forest Service should recommend incorporation of roadless lands less than 500 acres in size into adjacent Wilderness areas.

Response: In response to public comments to the DEIS**,** the roadless inventory process was expanded to include review of all roadless areas adjacent to wilderness, regardless of size (See FEIS Volume 2, Chapter 3, Topic 4 Roadless, Affected Environment and Administrative Record 500 Acre Analysis - Boyst 2001).

W6 Public Concern: The Forest Service should recommend wilderness designation in areas accessible to the public.

Response: FSH 1909.12.7 outlines the direction for evaluating potential wilderness. Key components of this direction are capability (environment, challenge, outdoor recreation opportunities, special features, and manageability), availability, and need. Proximity to urban or rural areas is not identified as a desirable attribute and in many instances may pose conflicts with solitude, challenge, and manageability characteristics.

W7 Public Concern: The Forest Service should include specific areas in Wilderness recommendations.

W7.1 Big Ridge to South Fork

W7.2 Red Dirt/Derby

W7.3 Acorn Creek

W7.4 Deep Creek

W7.5 Woods Lake

W7.6 Sloan Peak

W7.7 Hardscrabble, Adam Mountain, and North Woody

W7.8 Basalt Mountain/Red Table

W7.9 Meadow Mountain "B," Tigiwon, Homestake, No Name, Woods Lake, and Mormon Creek

W7.10 Hunter and North Independence "A"

W7.11 Areas north and south of the Colorado River in Glenwood Canyon

W7.12 Thompson Creek

W7.13 Flat Tops

W7.14 Eagle's Nest Wilderness Extension

W7.15 Southwest Holy Cross

W7.16 Williams Fork

W7.17 Black Lake West

W7.18 Black Lake East

W7.19 Ute Pass

W7.20 Red Table Mountain

W7.21 Treasure Mountain

W7.22 Assignation Ridge

W7.23 Meadow Creek

Response: For a specific area to be recommended as wilderness, it must be inventoried as "roadless" and be determined to be capable and available for wilderness designation. The roadless area inventory and evaluation process resulted in 37 key areas on the Forest being found to have the qualities necessary to be recommended wilderness (FEIS, Chapter 3, Topic 4, Affected Environment). In the forest planning process, a range of alternatives recommending wilderness was considered. The Forest Plan Interdisciplinary Team considered all of the resource needs and recommended that at most 30 areas (200,000 acres) be considered as recommended wilderness. Other management area designations that offer protection of special and unique qualities include the following: research natural areas (FEIS, Appendix G), special interest areas (FEIS, Appendix H), and wild and scenic rivers (FEIS, Appendix F).

W8 Public Concern: White River National Forest should not recommend additional Wilderness.

Response: The consequences of not recommending any additional wilderness were analyzed in alternatives B and F.

W9 Public Concern: White River National Forest should manage the North Woody area as 1.31.

Response: The North Woody roadless area is proposed to be managed as 1.31 (Backcountry recreation non-motorized management area) in Alternative C and 3.31 Backcountry recreation year-round motorized) in Alternative B.

W10 Public Concern: The Forest Service should clarify criteria used to determine suitability of roadless areas for Wilderness recommendation.

Response: The criteria for roadless areas are listed in the FEIS, Volume 4, Appendix C, as well as, in Forest Service Handbook at section 1909.12. Each inventoried area has its own report detailing the findings for each criterion. The reports for the areas evaluated as capable and available for potential wilderness are found in the FEIS, Volume 4, Appendix C. The reports for inventoried roadless that were evaluated as being either capable and not available or not capable and not available are found in the Administrative Record (Upton 2001) and are available upon request.

W11 Public Concern: The Forest Service should explain why the list of priority plant communities recommended for wilderness protection differs from the original need determination. –and-

W12 Public Concern: The Forest Service should eliminate requirement that a given roadless area contain two underrepresented plant communities to qualify as having a 'high biological need" for designation. -and-

W13 The Forest Service should not use outside sights and sounds as criteria for disqualifying an area from Wilderness recommendation. –and-

W14 The Forest Service should not use the presence of motorized vehicles as a criterion to disqualify an area from Wilderness consideration. –and-

W15 Public Concern: Definable and defensible boundary criteria for manageability standards in the DEIS should conform to the Wilderness Act and the National Forest Management Act.

Response: The methodology utilized for the biological need determination and the capability and availability analysis is found in the FEIS, Volume 4, Appendix C and responds specifically to these concerns. In response to public comments of the DEIS, the Wilderness Needs Assessment (Boyst 2001) citeria for "high biological need" was modified to reflect acres of underrepresented plant communities, regardless of the number of plant communities.

"Manageability" is one of the wilderness characteristics of capability defined in FSH 1909.12.7.21. Factors considered include the wilderness "size, shape, and juxtapositon to external influences." Boundaries were evaluated in terms of the following: 1) "locations that avoid conflict with important existing or potential uses outside the boundary that might result in demand to allow nonconforming structures and activities in the wilderness

and 2) the ability to "shield to protect the wilderness environment inside the boundary from the sights and sounds of civilization outside the wilderness."

The Wilderness Act (16 U.S.C. 1131-1136) provides general direction in Sec. 2(c) for wilderness by defining wilderness and how it is to be managed. It does not give specific direction regarding definable and defensible boundary locations, rather general guidance. A wilderness is defined as "an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natual condition…." FSH 1909.12.7.21(5) provides the specific process for boundary evaluation and adjustmenst (FSH 1909.12.7.26).

The National Forest Management Act of 1976 (16 U.S.C. 1600) also provides general direction for wilderness planning. Sec. 6(e)1 directs the Secretary to assure that National Forest System planning provide for multiple use and sustained yield of products and services, including wilderness and Sec. 6(g)3a requires guidelines for land management plans be developed which insure consideration of the economic and environmental aspects of various systems of renewable resource management, including wildneress." The policy in FSH 1909.12.7 further defines how to implement the legislation, specific to boundary criteria.

W16 Public Concern: The Forest Service should adopt wilderness study management designations similar to those used by the Bureau of Land Management.

Response: The Forest Service does not have the authority to designate Wilderness Study Areas, a designation sometimes found on lands administered by the Bureau of Land Management (BLM). Congress designates Wilderness Study Areas in a process similar to designating Wilderness. The Forest Service can, like the BLM, manage Wilderness Study Areas once they are designated.

Adequacy of Analysis of Potential Wilderness

W17 Public Concern: The Forest Service should reevaluate its recommended wilderness rating system. –and-

W18 The Forest Service should clarify the decision-making process between highly rated potential wilderness and recommended wilderness.

Response: The Forest's inventory and evaluation of potential wilderness is based on FSH 1909.12.7. The ratings of capability and availability assist the decision-maker in evaluating the quality of the potential wilderness and are not intended to translate into uniform decision-making The decision-maker must consider the need for new wilderness along with a wide range of multiple-use demands on National Forest System (NFS) lands. Details of the evaluation process for potential wilderness is found in the FEIS, Volume 4, Appendix C Roadless Areas. A summary of the information is also found in the FEIS Volume 2, Chapter 3, Topic 4 Roadless Area Management, Affected Environment.

W19 Public Concern: The Forest Service should not use lack of management resources as a rationale for disqualifying areas from Wilderness recommendation.

Response: Lack of management resources was not a criterion examined during the roadless area inventory; however, manageability of areas was examined. This direction is found in FSH 1909.12.7.2. It states that the size, shape and juxtaposition to external influences are to be considered in the location of boundaries. The reports for the areas evaluated as capable and available for potential wilderness are found in the FEIS, Volume 4, Appendix C. The reports for inventoried roadless that were evaluated as being either capable and not available or not capable and not available are found in the Administrative Record (Upton 2001) and are available upon request at the Supervisor's Office.

W20 White River National Forest should validate its roadless inventory methodology and create a new roadless area inventory.

Response: The roadless inventory was completed in compliance with Forest Service direction (FSH 1909.12.7.1) and was also utilized in the National Roadless Area Conservation Rule of January 2001 (USDA 2000a). The inventory process utilized is outlined in FEIS, Volume 4, Appendix C and summarized in FEIS, Chapter 3, Topic 4, Affected Environment. A new roadless area inventory is not justified at this time.

W21 Public Concern: The FEIS should include analysis of fire potential in roadless areas.

Response: Fire in roadless areas will be managed according to Forest-wide standards and guidelines for fire management, approved fire management plans, and the national roadless area conservation policy. Roadless areas, like all other lands managed by the White River National Forest, were included in the fire analysis found in Chapter 3, Topic 1, Part 3, Section 7 of the FEIS.

Legal and Administrative Framework for Recommended Wilderness

W22 Public Concern: The Forest Service should not obliterate roads in areas deemed suitable for Wilderness recommendation.

Response: Site specific decisions for system road obliteration is outside the scope of this decision and will be made either during the travel management plan revision or at the project level. However, where there is a conflict between the management area designation—such as recommended wilderness—and current uses (both legal and illegal), management actions will be necessary to correct the discrepancy. (White River National Forest Land and Resource Management Plan Record of Decision). For instance, travel within the 1.2 Recommended Wilderness areas will be limited to nonmotorized and nonmechanized uses.

Management of nonsystem roads is discussed in the FEIS, Volume 2, Chapter3, Topic 2, Part 1 Affected Environment-Ways.

W23 Public Concern: The Forest Service should allow Congress to determine the need for additional Wilderness areas.

Response: Forest plans must contain an evaluation of areas considered to have potential for wilderness designation (36 CFR 219.17). This evaluation includes the social or biological need for additions to the National Wilderness Preservation System. The results of this evaluation are presented in Appendix C of the FEIS and summarized in the FEIS, Volume 2, Chapter 3, Topic 4.

The Forest Plan decision includes recommendations for additions to the National Wilderness Preservation System, but does not designate new wilderness areas. Only Congress has the authority to act, or not to act, on the wilderness recommendations made in forest plans.

W24 Public Concern: The White River National Forest Land and Resource Management Plan should not conflict with the national Roadless Area Initiative.

Response: The 2002 Forest Plan is not subject to the National Roadless Area Conservation Rule published in the January 12, 2001 *Federal Register*. The roadless rule has been placed under a court injunction, and suspended subject to revision. The 2002 Forest Plan is in compliance with interim inventoried roadless area direction released by the Chief of the Forest Service in December of 2001. (See: White River National Forest Land and Resource Management Plan Record of Decision).

W25 Public Concern: Forest Service emphasis on non-wilderness uses above other uses should not violate agency policies and regulations.

Response: Roadless area evaluation and potential wilderness recommendations were made in compliance with Forest Service direction and policies outlined in FSH 1909.12.7 and Interim Directives FSM 1920-2001-1 and 7710-2001-3. As described in FEIS, Volume 4, Appendix C and in Responses W19, 20 and 22; the evaluation of availability is "conditioned by the value of and need for the wilderness resource compared to the value of and need for other resources."(FSH 1909.12.7.22). In the DEIS and FEIS, there is no goal or objective to emphasize non-wilderness uses above other uses. The decision-maker must consider the need for new wilderness along with a wide-range of multiple use demands on the White River National Forest System lands.

W26 Public Concern: The Forest Service should establish a process to reverse roadless area designations.

Response: There is currently no process in place to reverse roadless area designations. Roadless areas can be reviewed, however, and if data used to make the roadless designation is found to be in error, the designation of the area, or parts of the area, may be altered or amended.

W27 Public Concern: The roadless area inventory criteria should be consistent with the Forest Service Handbook by including areas with certain human impacts.

Response: The Forest Service Handbook (FSH 1909.12) outlines the process for identifying and evaluating potential Wilderness in the National Forest System. Roadless areas must meet the statutory definition of Wilderness as "an area of undeveloped Federal

land retaining its primeval character and influence, without permanent improvements or human habitation which is protected and managed so as to preserve its natural conditions (16 U.S.C. 1131-1136).

Generally, the impact of improvements on potential wilderness must be minimal or the level of development must be insignificant for an area to be included into the roadless inventory. Inventory criteria for including improvements is outlined in FSH 1909.12.7.11a. The following types of improvements were included in the roadless area inventory unless their development was significant (e.g., access roads or highly visible development): airstrips and heliports, electronic installations, mining, range and wildlife, recreation, utilities, mineral leases, areas with non-federal ownership, timber harvest, watershed treatment, undeveloped portions of ski area permits, and approved site-specific development.

Improvements excluded from the inventory because of their significant level of development include: roads, reservoirs, pipelines, canals, ditches, aqueducts, water diversion structures, stock tanks, power transmission lines, telephone lines and buildings. Areas where past timber harvest, recent mining, and/or current oil and gas leasing activities are evident were also excluded from the roadless area inventory.

See: Discussions on the inventory process in the FEIS, Volume 4, Appendix C Roadless Areas. and summarized in the FEIS Volume 2, Chapter 3, Topic 4 Roadless Area Management, Affected Environment. Detailed inventory process records are found in the Administrative Record, White River National Forest Plan, Upton 2001.

Roadless Area Management

W28 Public Concern: White River National Forest should prohibit specific activities in roadless areas.

W28.1 Prohibit Logging, Road Building, And Development

W28.2 Prohibit Ski Area Development

W28.3 Motorized Travel

Response: Roadless areas will be managed according to the management area prescription assigned to each one in the selected alternative. Forest wide guidelines for management of roadless areas emphasize retention of roadless characteristics in all alternatives.

W29 Public Concern: The Forest Service should allow certain activities in roadless areas.

W29.1 Coal Mining

W29.2 Public Utility Infrastructure

Response: Roadless areas will be managed for all activities according to the management area prescription assigned to each one in the selected alternative and in compliance with all national direction for roadless area management. Roadless areas that are Forest wide guidelines for management of roadless areas emphasize retention of roadless characteristics in all alternatives. Coal mining and development of infrastructure of public utilities may be allowed if the proposed action meets Forest and national direction on inventoried roadless and is authorized after an environmental anlaysis is completed.

Management of Specific Areas as Roadless

W30 Public Concern: The Forest Service should manage specific areas as roadless.

W30.1 Coon Hill

Response: In all alternatives, Management Area 2.1 (special interest area with minimal use and interpretation) has been applied to the Coon Hill area. This area is part of the Continental Divide Land Bridge Special Interest Area that emphasizes zoological features (FEIS, Appendix H). Motorized and mechanized travel will be prohibited when necessary to protect the values for which the area was established.

W30.2 Williams Fork, Tenmile and Hoosier Ridge

Response: The Temile and Hoosier Ridge roadless areas are proposed to be managed as 1.31 (Backcountry recreation non-motorized management area) in Alternative I and K. Travel in this area would be restricted to nonmotorized use and road building would not be permitted. In Alternative K the Williams Fork area is in 5.43 Motorized recreation is allowed within this management area but are required to stay on designated roads and trails.

W30.3 Tenderfoot Area

Response: Management Area 1.31 (backcountry recreation non-motorized) was applied to the Tenderfoot Roadless Area in Alternative I. Travel in this area would be restricted to non-motorized use and road building would not be permitted.

W31 Public Concern: White River National Forest should protect roadless areas adjacent to existing Wilderness.

Response: Roadless areas are managed with a wide range of management areas to emphasize a variety of uses, such as proposed wilderness, motorized and non-motorized recreation, and wildlife habitat. Alternative themes guided which management areas were applied to each roadless area.

W32 Public Concern: The Forest Service should change the management prescription from 5.43 to 5.41 in area between Boulder and Cataract Creek.

Response: The area between Boulder and Cataract Creeks was evaluated under several different management prescriptions. In Alternative B it was 5.41, in Alternatives C,D,E, and K it was 5.43 and in Alternative F it was 5.13. Management prescriptions 5.41 and 5.43 both emphasize the importance of the area as elk habitat. MA 5.41 is specific to winter range emphasis, while 5.43 includes winter range use along with other important elk seasonal uses. Portions of this particular area have been identified as having summer concentration and calving habitat importance in addition to its value as winter range. These areas are identified in the map and table included as a portion of the 5.43 description in Chapter 3 of the Revised Forest Plan.

W33 Public Concern: The Forest Service should create more management prescriptions for roadless areas.

Response: Management of inventoried roadless areas must comply with all national direction, including the most recent Interim Direction FSM 1920-2001-1 and 7710-2001-3. In the FEIS, roadless areas are assigned a wide range of management areas that allow for many uses, except those uses prohibited by the interim directives. Management area allocations for roadless areas include an emphasis on wilderness, recreation, domestic

livestock grazing and wildlife habitat. Many forms of recreation and travel will be available in these areas; however, most road construction and timber harvest will be prohibited.

Uses of the National Forest within management area prescriptions are managed within limitations set by the forest plan and other multiple-use laws and policies. Camping and livestock grazing are regulated by forest plan standards and guidelines. Limitations on hunting cannot be made in the forest plan as the Colorado Division of Wildlife determines hunting regulations.

TOPIC 5
SPECIAL AREAS

Part 1—Heritage Resources

W34 Public Concern: The Forest Service should revise Goal 2.3, heritage education and resource sites, in the forest plan.

Response: It is felt that an educated and involved public results in better stewardship of our heritage resources. People who feel a proactive sense of ownership adopt sites, help protect them, and in the long term preserve them. Not all sites should receive such an increase in use and visitation—some are too fragile to visit at all. Sites such as Camp Hale, Independence and Ashcroft Town sites (all on the National Register of Historic Places) could handle such an increase in vistation.

W35 Public Concern: The Forest Service should avoid the potential conflict created by recommending structures located in Wilderness to the National Register of Historic Places.

Response: All historic structures within current Wilderness on the Forest existed before the area was designated Wilderness. By statute, we must consider the significance of that presence on all National Forest System lands, including Wilderness. (See: National Historic Preservation Act of October 15, 1996; P.L. 89-665, 80 Stat. 915, as amended; 16 U.S.C. 470, 470-1, 470a, 470f, 470h-1, 470h-2, 470i, 470j, 470v, 470w-3).

W36 Public Concern: The Forest Service should validate significant cultural property claims. – and -

W37 Public Concern: The White River National Forest should protect Native American heritage resources.

Response: The White River National Forest has worked closely with the Ute People since 1989. We respect their input regarding their ancestral lands. The unique relationship enjoyed by Indian Nations, including the three Ute Tribes, is a government-to-government relationship between sovereign nations. The Forest Service is required by law to consult with them and will continue to do so in a respectful fashion regardless of the issues raised. The Forest agrees that standards need to be developed on a region-wide basis as to how sensitive areas and sensitive sites such as traditional cultural properties (TCPs) are handled. The Forest is actively working with the Regional Tribal Relations Program Manager to address this important need.

The Ute Trail, a TCP, is still being studied. Final locations have yet to be plotted. A management plan for the Old Ute Trail across the Flat Tops will be written with direct Ute involvement with the final location of the trail being determined by the Utes. Because of these factors, the location was not shown on any of the forest plan maps. These issues will be considered during project-level public scoping for the Old Ute Trail.

W38 Public Concern: The heritage resource survey strategy should comply with existing heritage resource laws.

Response: The legal and administrative framework that the Forest Service must comply with is listed in Chapter 3 of the FEIS. The FEIS states that only about five to 10 percent of the Forest has been intensively inventoried to locate historic and prehistoric resources. However, each time a ground disturbing activity is planned, the law requires that an inventory be conducted to mitigate any impacts to heritage resources. In addition, at least 125 sites are monitored annually for any adverse effects or vandalism.

An archeologist was part of the interdisciplinary team that prepared both the DEIS and the FEIS. The omission of his credentials was an error in the DEIS and was corrected in Chapter 4, List of Preparers, in the FEIS.

W39 Public Concern: The FEIS should include an analysis of the impacts on heritage resources from the alternatives.

Response: The effects analysis for heritage resources is found in Chapter 3, Topic 5, Part 1 of the FEIS.

W40 Public Concern: The Forest Service should describe how it will protect heritage resources.

Response: Heritage resources will be protected and managed according to Forest Plan standards and guidelines and applicable laws and direction. In addition, management plans for heritage resource sites are prepared on a case-by-case basis as the need and funding arise. One such site is Camp Hale—a long-term management plan was written for this site through a grant from the Colorado Historic Fund.

W41 Public Concern: The Forest Service should retain roads that possess heritage value as part of the region's mining history.

Response: Before any historic road can be obliterated, the area in which it is located must be inventoried under the National Historic Preservation Act (as described on page 3-390 of the FEIS). If the road is significant, then measures to protect it or mitigate the effects of the project on it have to be agreed to by the State Historic Preservation Officer. If determined to be significant, (i.e. eligible to the National Register of Historic Places) such roads will be protected or the effects of the project on those resources will be mitigated.

Part 2—Research Natural Areas

W42 Public Concern: The Forest Service should ensure that research natural areas serve their stated purpose.-and-

W43 Public Concern: The Forest Service should conduct further inventories to identify potential research natural areas.-and-

W44 Public Concern: The Forest Service should establish research natural areas in all ecosystems and elevation zones.-and-

Response: FSM 4063 provides direction on the establishment and management of research natural areas (RNAs). The Forest followed this direction in inventorying and establishing a database of potential RNAs identified in the FEIS and 2002 Forest Plan. The National Environmental Policy Act of 1970 requires the Forest Service to study, develop and describe appropriate alternatives to recommended courses of action. During the development of the FEIS, a range of alternatives was evaluated that included a range of potential RNAs that could be established. Efforts were made during the inventory phase to include all White River National Forest major ecosystem types and elevation zones in the group of potential RNAs.

Research natural areas (RNAs) are selected and established as part of the continuing land and resource management planning process for National Forest System lands (36 CFR 219.25, FSM 1922 and FSM 4063). The Forest evaluated potential RNAs identified during the planning process and made recommendations concerning establishment in the Record of Decision for the FEIS and 2002 Forest Plan.

W45 Public Concern: The Forest Service should change the research natural area management prescription to prohibit oil and gas leasing.

Response: The Forest developed and applied a guideline within Management Area 2.2 (research natural areas (RNAs)) that prohibits surface occupancy (2002 Forest Plan, Page 3-24). This guideline provides the necessary protection of surface values to meet the objectives of the RNA program, while not placing unnecessary restrictions on the mineral development.

W46 Public Concern: The FEIS should designate more research natural areas than recommended in the preferred alternative.

Response: See response W44, above. With regard to the East Lake Creek-West Cross Creek potential RNA, these changes were reviewed and incorporated, as appropriate, into the final ecological evaluation report for this potential RNA as well as proposed for incorporation into the FEIS and the 2002 Forest Plan.

W47 Public Concern: The Forest Service should remove "potential for conflict" as a criterion for disqualifying potential research natural areas.

Response: See response W44, above. Additionally, during the initial inventory phase several "screens" were used to narrow the focus of the inventory to a base of potential RNAs that could be logically and economically inventoried and documented for use in alternative development. One of the screens used was "existing and expected future management use" of the area. This allowed the Forest to identify areas as potential RNAs

that met the objectives of the program as well as avoid areas that might result in current or future conflicts. This step was completed early in the inventory phase, prior to field inventory work on any potential RNA. The use of these screens was not a significant limiting factor to developing a wide range of potential sites for possible inclusion into the RNA program.

W48 Public Concern: The White River National Forest should base its recommendations for research natural areas on Colorado Natural Heritage Program data and analyses.

Response: The Colorado Natural Heritage Program (CNHP) countywide biological survey program and the RNA program have different objectives and results. It is not appropriate to include all of the areas identified during the CNHP county inventories as RNAs. The field evaluations of potential research natural areas (RNAs) on the Forest were accomplished under a challenge cost share agreement with the CNHP. The ecological evaluations for all potential RNAs are included in the administrative record at the Forest Supervisor's Office. These ecological evaluations were used to assess whether the areas initially identified during the mapping process met the objectives of the RNA program and should be included as potential RNAs during alternative analysis. Approximately one-half of the inventoried areas were included in alternative analysis. The rest of the areas were dropped from further consideration as RNAs for a variety of reasons—mainly duplication of ecological values with other areas and failure of the area to meet the objectives of the RNA program. Several of the areas dropped from further RNA consideration had values that met the objectives of the special interest area (SIA) management prescription. These areas were included in various alternatives as SIAs.

Part 3—Wilderness

W49 Public Concern: The Forest Service should regulate commercial access and development in and adjacent to Wilderness areas.

Response: The Wilderness Act of 1964 outlines in 4(d) 6 that "commercial service may be performed within the wilderness areas designated by the Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas. Forest Service policy on outfitter and guide operations is similar (FSM 2323.13g) and directs the agency to "ensure that outfitters provide their service to the public in a manner that is compatible with use by other wilderness visitors and that maintains the wilderness resource. Both the Act and the policy require that the permitted activity be compatible with the wilderness resource but neither rank one type of compatible activity over the other. Decisions regarding specific outfitting and guiding permits are completed at the project level and are outside the scope of the forest plan revision.

Land management decisions on areas adjacent to wilderness consider the management area direction, recreation opportunity spectrum, and the related impacts to designated wilderness. FSM 2320.3(6) instructs the agency *not* to "maintain buffer strips of undeveloped wildland to provide an informal extension of wilderness. Do not maintain internal buffer zones that degrade wilderness values. Use the recreation opportunity spectrum as a tool to plan adjacent land management."

W50 Public Concern: The Forest Service should limit the use of horses in Wilderness areas.

Response: Use of horses in wilderness is consistent with the primitive non-motorized and non-mechanized recreation described in the Wilderness Act of 1964. Specific trails may not be suitable for horse travel because of poor design, wetland impacts, or rocky soils. Decisions on the suitability of a specific trail in Wilderness for horse travel is a site specific decision that will be made in the Travel Management Plan.

W51 Public Concern: White River National Forest should discourage introduction of non-indigenous fish species in Wilderness areas.-and-

W52 Public Concern: White River National Forest should discourage aerial fish stocking in Wilderness.-and-

W53 Public Concern: Stocking of non-indigenous fish should be prohibited in wilderness areas.

Response: The Wilderness Act of 1964 clearly supports the State's jurisdiction and responsibility for managing fish and wildlife (Sec 4d(8)). In order to provide direction within and between multiple agencies with divergent missions, a Memorandum of Understanding (MOU) was developed between the Forest Service, Bureau of Land Management, and the International Association of Fish and Wildlife Agencies (States) in 1986. Policies and guidelines regarding fish stocking are outlined in this agreement. The order of preference for stocking fish is: (a) Federally-listed threatened or endangered indigenous species, and (b) indigenous species. While stocking of exotic fish species is not allowed, species of fish traditionally stocked before Wilderness designation may be considered indigenous if the species is likely to survive.

Wilderness lakes on the White River National Forest are not currently stocked with any fish due to the threat of whirling disease. The Forest Service will continue to work with the Colorado Division of Wildlife (CDOW) to emphasize the protection of natural processes and indigenous fish populations in Wilderness.

The MOU also directs that aerial fish stocking be permitted for those waters in Wilderness where this was an established practice before Wilderness designation or where other practical means are not available. The Forest Service does not have jurisdiction over air space, but continues to work with the CDOW to develop management activities that are compatible with wilderness management objectives.

W54 Public Concern: The Forest Service should prohibit ADC operations in Wilderness areas.

Response: FSM 2323.33c recognizes the Animal and Plant Health Inspection Service's (APHIS) Animal Damage Control program and State agencies as having the authority and expertise to conduct predator control on National Forest System lands. This concern is outside the scope of this forest-planning process.

W55 Public Concern: The Forest Service should reconsider the conclusion that backcountry use negatively impacts Wilderness resources.

Response: Recreation use is an appropriate use of designated Wilderness. However, social and biological issues frequently occur as use levels rise. Negative social impacts from increased use are primarily related to the sense of the loss of solitude. Conflicts

between user groups may also rise. Negative biological impacts from increased use include habitat fragmentation from the proliferation of campsites and displaced native vegetation and increased soil erosion from the increase in the size and barren core of campsites. Leave No Trace minimum impact travel guidelines have been developed specifically to mitigate the impacts of backcountry use on National Forest System lands.

Monitoring and Enforcement of Wilderness Regulations

W56 Public Concern: The Forest Service should enforce leash laws in Wilderness areas.

Response: It is the responsibility of the Forest Service to enforce all National Forest system regulations both in and outside of Wilderness. The level of enforcement is dependent upon agency priorities and funding and is outside the scope of this analysis.

W57 Public Concern: The Forest Service should not purse active management in Wilderness areas.

Response: FSM 2320 directs wilderness management in the following manner:

- Manage the wilderness resource to ensure its character and values are dominant and enduring.
- Manage wilderness to ensure that human influence does not impede the free play of natural forces or interfere with natural successions in the ecosystems to ensure that each wilderness offers outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Wilderness managers strive to manage wilderness with the least amount of restrictions and regulations necessary to meet the above direction. Areas that receive little use and are surrounded by vast acreage of public lands often have little active management. Areas that are heavily utilized and/or adjacent to private lands that are heavily developed often need more restrictions to protect the wilderness resource.

W58 Public Concern: The Forest Service should promote "Leave No Trace" education.

Response: Public education is an important part of implementing the forest plan, but is outside the scope of this forest-planning document.

Wilderness Management Prescriptions

W59 Public Concern: The Forest Service should change the Standards for party encounters and campsite densities in semi-primitive Wilderness.

Response: The semi-primitive areas (previously call "transition zones" in the 1984 White River National Forest Plan) provide a transition from high-use non-Wilderness areas into Wilderness. Alternatives B, C, D, I and K propose semi-primitive (1.13) management areas that are similar to the current 8D (transition) in the 1984 White River National Forest Land and Resource Management Plan and represent less than 1% of the total acreage in Wilderness. Alternatives E (6%) and F (2.5%) propose increased corridors of 1.13 in areas currently receiving that level of use (for example hiking routes to 14,000 ft. peaks). See: FEIS, Volume 2, Chapter 3, Topic 5, Part 3 Wilderness, Environmental Consequences.

Camping in MA 1.13 is prohibited except for designated sites. In response to public comments the following guide line in Forest Plan, Chapter 3, MA 1.13 was changed: "Manage campsites: a) Concentrate use in Cole Condition Class 3 and 4 sites, and b) Manage Cole Condition Class 5 sites as either designated sites or rehabilitate to a lower condition class. The guide line in the draft Forest Plan for "Fewer than 6 other campsites visible or audible from any campsite" was dropped and campsite densities in 1.13 MA will be determined in site-specific wilderness plans.

Also in response to public comments, the encounter guideline for 1.13 was changed from "No more than **25** other parties encountered on a Forest Development Trail per day on 80% of the days in each use season. If more restrictive encounter guidelines are needed, a site-specific recommendation can be developed." (Draft Forest Plan, Chapter 3, MA 1.13) to "No more than **20** other parties encountered on a Forest Development Trail per day on 80 percent of the days in each use season. If more restrictive encounter guidelines are needed, a site-specific recommendation can be developed." (Final Forest Plan, Chapter 3, MA 1.13).

W60 Public Concern: The FEIS should retain all proposed 1.11 management prescriptions.

Response: The Forest Plan revision considers designating from 70,400 acres of 1.11 in Alternative E to 280,300 acres of 1.11 in Alternative K. (FEIS, Volume 2, Chapter 3, Topic 5, Part 3 Wilderness, Environmental Consequences)

W61 Public Concern: The Forest Service should adopt four levels of management prescriptions for Wilderness.

Response: The management areas utilized were established by the Forest Service nationally and have been utilized in the Black Hills, Rio Grande, and Routt National Forest Land and Resource Management Plan revisions. The interdisciplinary team reviewed the management prescriptions and agreed that the range of pristine, primitive, and semi-primitive was sufficient to protect wilderness resources.

W62 Public Concern: The Forest Service should assign 1.11 prescription to the area northeast of Whitney Peak in the Holy Cross Wilderness.

Response: Application of the 1.11 prescription to the area northeast of Whitney Peak in the Holy Cross Wilderness is analyzed in Alternative K.

W63 Public Concern: The Forest Service should designate specific areas as Pristine.

W63.1 Slate Creek, North Rock Creek, Boulder Creek, Harrigan Creek, Black Creek, South Rock Creek

W63.2 Ptarmigan Peak

Response: Criteria for designating an area as Pristine is outlined in the management area description for 1.11 in the Forest Plan. The headwaters of Slate, Rock, Harrigan, and Black Creek would be Pristine (1.11) under Alternative K. The lower portions of these drainages have system trails within them and therefore do not meet the criteria for pristine. Ptarmigan Peak and Boulder Creek also have system trails within the drainages and also do not meet the criteria.

W64 Public Concern: The Forest Service should change the designation of Buffalo Mountain from Pristine to Primitive.

Response: In response to public comments of the DEIS and because Buffalo Mountain has a nonsystem trail that receives a moderate level of use, this was considered in Alternative K.

W65 Public Concern: The Forest Service should change the designation of the East and West Maroon Bells trails to primitive.-and-

W66 Public Concern: White River National Forest should not designate the East and West Maroon Trail areas as pristine.

Response: The classification of the East and West Maroon Bells as pristine wilderness (Management Area 1.11) was an error in the DEIS that was corrected in the FEIS.

W67 Public Concern: White River National Forest should change the designation of the area between Mount Jackson and Rainbow Lake from primitive to pristine.

Response: Portions of the area between Mount Jackson and Rainbow Lake are considered pristine in Alternative K. Since Forest Development Trail (FDT) 1880 (East Lake Creek) transects a portion of this area, it does not in its entirety meet the management area theme and desired condition of pristine wilderness (Forest Plan, Chapter 3, MA 1.11)

W68 Public Concern: The Forest Service should achieve the desired condition on 60 percent of primitive and 40 percent of semi-primitive Wilderness areas.

Response: Forest Plan goals and objectives (2002 Forest Plan, Chapter 1) have been rewritten to conform to the Government Performance and Results Act (1993) and current Regional Forest Service direction. That objective now requires meeting the desired condition of these areas completely by the end of the forest planning period.

Part 4—Wild, Scenic, and Recreation Rivers

W69 Public Concern: The White River National Forest should propose the Wild and Scenic River recommendations presented in Appendix F of the FEIS. – and

W70 Public Concern: The Forest Service should adopt Alternative I for its recommendations of Wild and Scenic Rivers. – and -

W71 Public Concern: The Forest Service should propose Deep Creek as a Wild and Scenic River.

Response: All rivers found to be eligible for Wild, Scenic, or Recreational River status are recommended for such designation in each alternative. Refer to Appendix F of the FEIS for more information.

W72 Public Concern: The White River Forest Plan Preferred Alternative should recommend the Eagle River from Redcliff to Minturn for Wild and Scenic River designation.

Response: The Forest analyzed (Administrative Record for Wild and Scenic Rivers, Forest Supervisor's Office) the Eagle River between Redcliff and Minturn for its potential eligibility as a Wild, Scenic, or Recreational River. The Eagle River was determined not eligible for designation because there were no resources identified with outstandingly remarkable values. Factors considered in the eligibility evaluation included: existing water flow conditions, impoundments, diversions and other modifications of the stream channel and/or related land. The evaluation also identified the scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values and describes why they are or are not outstandingly remarkable.

W73 Public Concern: The Forest Service should use condemnation in order to end incompatible uses of potential Wild and Scenic Rivers.

Response: The national wild and scenic river system comprises rivers that have been authorized for inclusion by an Act of Congress. Once authorized, each component of the Wild and Scenic River system is to be managed to protect and enhance the values for which the river was designated while providing for public recreation and resource uses that do not adversely impact or degrade those values. Land uses and developments on private lands within the river area that were in existence when the river was designated may be permitted to continue. New land uses must be evaluated for their compatibility with the purposes of the Act.

Where conflicts exist, a range of management actions including direct purchase, land exchange, or purchase of conservation easements may be utilized to protect the values of the wild and scenic rivers. Condemnation is a last resort tool that may also be utilized when other management actions have failed to protect the values for which the river was designated.

Part 5—Caves

W74 ***Public Concern: The Forest Service should protect the caves on the White River National Forest.- and-***

W75 ***Public Concern: The White River National Forest should protect as "significant" caves identified by Alternatives C, D, F and I.***

Response: The Forest nominated three caves as significant caves in all alternatives in the forest plan. These caves are: Groaning Cave, Hourglass Cave and Ron-Tom Cave. This information is found in the FEIS in Chapter 3, Topic 5, Part 5.

W76 ***Public Concern: The Forest Service should consider the effects of changes in groundwater tables on significant caves.***

Response: Ground water issues are considered when preparing individual cave management plans, not during the forest planning process. The analysis for individual cave management plans includes effects of potential management activities on ground water and the impact that would have on cave resources. Groundwater is also monitored for potential impacts on caves.

Part 6—National Trails

W77 ***No Concerns Articulated in Public Comment for this Section***

Part 7—Scenic Byways

W78 ***Public Concern: The Forest Service should designate Top of the Rockies as a Scenic Byway.***

W78.1 Top of the Rockies

Response: The Top of the Rockies is designated a scenic byway by the State of Colorado and was omitted from Alternative D in error. This has been corrected in the management area map for Alternative K in the FEIS (4.23 Scenic Byway).

W79 ***Public Concern: The Forest Service should not designate the Independence Pass corridor as a Scenic Byway.***

Response: The State of Colorado designates Scenic Byways. The Independence Pass corridor is designated by the State as a "scenic area highway". The Forest Service analysis of the Independence Pass corridor determined that it was best to manage the corridor under the 4.2 Scenery Prescription to emphasize the scenic values of the area.

Refer to FEIS, Volume 2, Chapter 3, Topic 3, Part 4 Affected Environment and Administrative Record, Forest Supervisor's Office, Scenery Analysis.

Part 8—Special Interest Areas

W80 Public Concern: The Forest Service should designate certain areas as Special Interest Areas.

W80.1 Camp Hale and Holy Cross City

W80.2 Upper Blue

W80.3 Cucumber Gulch

W80.4 Independence Pass

W80.5 Jakeman East

W80.6 Leeman Creek

W80.7 Upper Gypsum Creek

W80.8 All Special Interest Areas identified in Appendix H

Response: The Special Interest Areas that were analyzed in the DEIS can be found in FEIS, Volume 4, Appendix H. This Appendix contains information on the type of special interest area, which alternatives it was considered in, and a description of the area. Specific special interest areas appear in the alternatives with themes that are supportive of the values and desired conditions of the specific special interest areas. Therefore, each special interest area does not appear in each alternative.

As recommended, Camp Hale and Holy Cross City are managed as special interest area 3.1 in alternatives C, I and K.

The 18-acre Cucumber Gulch drainage downstream of County Road 3 is not managed as a special interest area in any alternative. An 8.25 has been applied in this area due to its higher use in ski area administration.

The expanded use of the Quandary Peak Special Interest Area prescription to protect sensitive plant species in the Upper Blue was limited to a smaller area in the preferred alternative for the FEIS, which only extends just south of Mohawk Lake and Pacific Peak. Under the preferred alternative, proposed management activities along the Tenmile Range/ Upper Blue Corridor will require analysis of any potential impacts to sensitive plant species, regardless of the management area prescription.

As recommended, a portion of the Independence Pass corridor that reflects the areas history is managed as a special interest area 3.1 in the Alternative E and in the preferred alternative.

Jakeman East, Leeman Creek and Upper Gypsum Creek areas have all been analyzed in the FEIS to be managed as special interest areas in Alternative I. These three areas are places that have been harvested for timber, and the emphasis of the SIA designation would be to accelerate and monitor regeneration. These areas are not managed as special interest areas in Alternative K because revegetation and monitoring of these areas can take place without the special interest area designation.

There are no special interest areas proposed in existing wilderness areas.

W81 Public Concern: Extractive activities are not compatible with Special Interest Areas and should be banned.

Response: Special interest areas are managed to protect or enhance areas with unusual or unique ecological, zoological, geological, scenic, historic or prehistoric characteristics, as described in Chapter 3 of the forest plan.

Forest Plan management implementation guidelines ensure protection of the values for which the area was proposed or designated. These area-specific guidelines only allow vegetation alteration, oil and gas leasing, and mineral development to occur when the activities are necessary to meet specific resource objectives and maintain the values for which the individual area was proposed or established.

For further information see the specific descriptions for the proposed special interest areas in Appendix H of the FEIS.

TOPIC 6
TIMBER MANAGEMENT

General Management Direction

T1 Public Concern: The Forest Service should limit logging on White River National Forest. – and –

T1.1 Reduce Logging In Areas Of High Recreational Value

T1.2 Prohibit Logging Near Wilderness Areas

T1.3 Confine Logging To Roaded Areas

T1.4 Decrease Logging Of Old Growth

T1.5 Decrease Logging of Aspen

T1.6 Log Only Beetle-Killed Trees

T2 Public Concern: The Forest Service should ensure that habitat needs are met before allowing logging or development.

Response: The Forest Service manages forest resources to meet many needs and comply with legal mandates, including laws that direct the Forest Service to manage for the production of timber products (Organic Administration Act, Sustained Yield Management Act, Multiple-Use Sustained-Yield Act), and laws that mandate protection of resources such as the Organic Administration Act, Sustained-Yield Management Act, Clean Water Act, Multiple Use-Sustained Yield Act, National Environmental Policy Act, Endangered Species Act, North American Wetlands Conservation Act.

Each of the alternatives in the DEIS and the alternative developed for the final Forest Plan, limit logging on the Forest to areas that are 'suitable', both in terms of natural capabilities and in terms of goals, objectives, and management emphases in each area of the Forest.

Timber production remains a viable part of the mission of the Forest Service, as does the protection of soil, water, and all other forest resources. Until the general public no longer requires products from wood fiber, there will be a continuing need to manage forests for timber production.

From certain viewpoints, increasing timber products imports from countries with weaker environmental laws is not being environmentally responsible.

T3 Public Concern: The Forest Service should allow timber harvest.

Response: Each of the alternatives in the DEIS and the alternative developed for the final Forest Plan, provide for timber harvest in areas that are 'suitable', both in terms of natural capabilities and in terms of goals, objectives, and management emphases in each area of the Forest.

T4 Public Concern: Saw timber allowable sale quantity targets should be reduced in the preferred alternative in order to increase habitat preservation.

Response: The allowable sale quantity (ASQ) is not a target, but the maximum level or limit on the amount of timber that may be sold from the planning area during a ten-year planning period, taking into account multiple-use goals and other aspects of forest plan management (36 CFR 219.3). Generally, the ASQ's timeframe is associated with the first decade of the Forest Plan's base sale schedule. The ASQ is developed using a computer model, and is based on average or representative situations, rather than complete inventories of the forest lands involved. As a result, the model often differs from what is found in site-specific examinations during project decision-making. The ASQ does not represent a quantity that is required to be offered for sale, but is only the upper limit on sale offerings.

The allowable sale quantity (ASQ) is heavily dependant on the amount of acres designated as suitable for timber harvest. Alternative D emphasizes active vegetation management in an effort to increase and enhance wildlife habitat, designating 434,000 acres suitable for timber harvest. A computer model used the number of acres suitable for timber harvest, in addition to primary factors affecting timber harvest, to determine what timber stands should be cut, how and when, to determine the ASQ. A detailed description of the ASQ analysis can be found in Appendix B of the FEIS.

T5 Public Concern: Allowable sale quantity should be adjusted to take into account helicopter logging in roadless areas.

Response: The Allowable Sale quantity calculation does include harvest in 'suitable' roadless areas. The lands designated for timber production include both areas with existing roads and areas which are partially or entirely roadless. The decision of what harvest methods to use, helicopter versus conventional ground based systems, for example, in harvesting timber in a 'suitable' roadless area is a decision made at the site-specific project planning stage. Harvest method is not a Forest Plan level decision.

For timber harvest in roadless areas, the ASQ analysis assumed conventional logging because it is much cheaper than helicopter logging. During project planning for a given area of 'suitable' land, helicopter logging may be evaluated as a harvest method option.

T6 Public Concern: The Forest Service should disclose the amount of "unsuitable" land that is expected to be harvested for ecosystem restoration reasons that is not included in allowable sale quantity projections.

Response: The amount of "unsuitable" land that is expected to be harvested, for ecosystem restoration and other resource objectives is displayed as *Other Vegetation Management* (OVM) in the FEIS. The tables display the timber sale program quantity (TSPQ) for the first decade of the Revised Forest Plan.

T7 Public Concern: The Forest Service should increase timber sales and lower minimum bid requirements.

Response: The number of timber sales offered is influenced by many factors, primarily supply, demand, budget, and national and regional natural resource policy. An analysis was completed (Appendix B) to project future supply, demand and forest budget. This information was then used to determine future "volume offered" for each management alternative.

The FEIS developed and evaluated a range of management alternatives that provided a wide range of timber production levels. Alternative B represents current timber production under the present Forest Plan. Timber production is reduced from current levels in Alternatives C, D, E, I and K. Alternative F, which emphasizes the maximum use of natural resources on a sustained-yield basis, provides the highest timber production among all the alternatives.

The Forest Service directive system is the primary basis for management and control of all internal programs, and serves as the primary source of administrative direction to Forest Service employees. The system sets forth legal authorities, policies, standards and procedures for establishing the Forest Service's timber sale bidding requirements. Management direction in the directive system, including the Forest Service Manual (FSM) and Forest Service Handbook (FSH), is part of the forest plan management direction.

Amendment of the Forest Service's timber sale bidding requirements through the Forest Service directive system should be addressed at a regional or national level and is not appropriate at the forest planning level.

T8 Public Concern: The Forest Service should favor local logging companies in the bidding process.

Response: Refer to response to Public Concern T6. Amendment of the Forest Service's timber sale bidding process through the Forest Service directive system should be addressed at a regional or national level and is not appropriate at the forest planning level.

T9 Public Concern: The Forest Service should clarify the apparent conflict within the preferred alternative between the total acres of suitable timberlands and proposed limitations on road building.

Response: The DEIS incorporated a decision on the White River National Forest's Access and Travel Management Plan. Given the complexity of trying to analyze both decisions, the Forest decided to separate the Land and Resource Management Plan decision from the Access and Travel Management Plan decision. The FEIS and accompanying Record of Decision (ROD) will disclose the Land and Resource Management Plan for the White River National Forest.

Following the release of the Revised Forest Plan ROD and FEIS, the Forest will resume our analysis of the Access and Travel management Plan for the selected Forest Plan alternative. The Access and Travel Management Plan will set guidelines and any limitations addressing road construction and reconstruction for the White River national Forest.

T10 Public Concern: The allowable sale quantity for the White River National Forest should not be constrained by predicted budget levels.

Response: The allowable sale quantity (ASQ) is determined at the full implementation level and is not constrained by budget. The Forest does not view ASQ as a target-it is a measure of the forest's capacity to produce a sustainable supply of timber on suitable timber lands given full program funding and inherent constraints (e.g., standards and guidelines). ASQ is displayed for each management alternative in Chapter 2, Figure 13 of the FEIS.

The ASQ would normally be used as the upper limit on annual harvest in the first decade. However, based on historic supply and demand and existing mill capacity, the Forest Leadership Team determined that the harvest levels associated with limited budgets were more appropriate for analysis. Two budget levels were analyzed for each management alternative. The first is based on the Forest's "experienced budget" level, which represents the average annual budget between 1997 and 2000. The second is the "full budget" level, which represents the funding of all programs at a level one and one-half times as much as the experienced budget level. The purpose of the two budget levels was to describe to the public and the decision maker how production levels and effects change under varying budgets. The timber volume harvested under the "experienced budget" and "full budget" levels is not termed "ASQ" but rather is called "volume offered." The use of budget constraints in determining "volume offered" is explained in the Timber section of Appendix B of the FEIS.

Ultimately, the level of funding the Forest receives to implement the Revised Forest Plan will be determined by the level of appropriations from Congress and how these funds are prioritized and distributed nationally and regionally.

Forest Health

T11 Public Concern: The Forest Service should emphasize active management in white River National Forest.

Response: Refer to response to Public Concern T10. Alternatives B, C, D, E, F, and K all emphasize to varying degrees the use of active management activities to meet forest health and biodiversity goals and objectives. Alternative F represents the alternative with the most aggressive approach to active vegetation management and places a low emphasis on relying on natural processes.

T12 Public Concern: The Forest Service should use timber harvest as a tool to manage for forest health.

Response: See response to Public Concern T11.

T13 Public Concern: The Forest Service should limit use of timber harvest as a tool to manage forest health.

Response: See response to Public Concern T10.

T14 Public Concern: To restore forest health, the Forest Service should allow natural processes to prevail.-and-

T15 Public Concern: The Forest Service should reduce the amount of active management proposed for White River National Forest.

Response: Forest ecosystem health is at the heart of the Forest Service mission, and is embedded in the goals of ecosystem management. The dynamic nature of forested ecosystems, combined with human interactions, provides numerous challenges to maintaining forest health. The FEIS analyzes a range of six management alternatives, which to varying degrees emphasize the use of management activities (like timber harvest) to meet forest health and biodiversity goals and objectives. Natural processes are the current dominant force of change on the forest.

Alternatives B and F emphasize active vegetation management of all habitat types, including the use of such tools as timber harvest, prescribed fire, and structural improvements. This is an aggressive approach to habitat management and places a low emphasis on letting natural processes run their course. These alternatives would use active management to make rapid progress toward a diverse, healthy ecosystem condition.

Alternatives D and K stress the need for management activities to mimic the Historic Range of Variability (HRV) conditions to meet biodiversity goals. In these alternatives, vegetation management activities will be designed to incorporate HRV landscape pattern characteristics into treatment areas.

The themes for Alternatives C, E, and I do not stress the need to mimic HRV conditions in management activities. Few impacts to current silvicultural treatments are expected under these alternatives.

Alternative I emphasizes the idea that the best way to perpetuate existing ecosystems, forest health, and biological diversity is to allow natural disturbance regimes and other ecological and evolutionary processes to occur without human intervention. Natural processes occur to the highest degree in Alternative I than in any other alternative.

The reduction of active vegetation management is best reflected in Alternatives C and I.

T16 Due to a lack of understanding of natural processes and outcomes, the Forest Service should utilize management strategies other than active habitat management.

Response: See response to Public Concern T10. In comparison to the other five alternatives, Alternative I places the greatest emphasis on management strategies other than active vegetation management.

T17 The Forest Service should both actively manage and rely on natural processes.

Response: See response to Public Concern T10. Alternatives D and K do the best at trying to balance the use of active vegetation management and reliance on natural processes to maintain forest health.

T18 Public Concern: The Forest Service should manage timber to improve wildlife habitat.

Response: Alternatives B, C, D, E, F, and K will rely on vegetation management activities to varying degrees to both mimic Historical Range of Variability (HRV) conditions and accomplish forest health and biodiversity goals. If analysis indicates that current vegetation differs greatly from historic norms, vegetation manipulation—including timber harvesting—may be used to emulate natural patterns of composition and structure.

The effects of implementing various silvicultural systems in the ecosystems represented on the White River National Forest are well documented in research and in the experiences of agency professionals. The Forest-wide Standards and Guidelines were developed to minimize impacts to other forest resources which may result from implementation of vegetation management activities. In addition, the Forest Service will utilize an adaptive approach to resource management. To this end, the effective use of the monitoring plan will assist in determining if management prescriptions are achieving

desired conditions. If it becomes apparent that the objectives and desires are not being achieved, then adaptive changes will be made.

T19 Public Concern: The Forest Service should ensure that commodity yields are determined and constrained by the health and functioning of ecosystems.

Response: The 2002 Forest Plan established six Forest-wide Goals and Objectives (2002 Forest Plan, Chapter 1) to provide overall direction for managing the White River National Forest. Ecosystem health is specifically identified as on of the guiding management goals for the White River National Forest. The Forest Plan Standards and Guidelines were developed for the protection or management of different forest resources and maintaining the sustained capabilities of the forest ecosystem. Management alternative are designed to meet all six Forest-wide Goals to varing degrees and adhere to the concepts of ecosystem management and multiple use. Timber yields for each management alternative were developed consistent with Forest-wide goals and Forest Plan Standards and Guidelines.

Silvicultural Systems

T20 Public Concern: White River National Forest should reduce or eliminate clearcutting.

T20.1 Spruce and Fir

T20.2 Ponderosa Pine

T20.3 Vail Area

Response: The use of clearcutting has been diminishing on the White River National Forest, as well as within Region Two of the Forest Service and across the western United States.

Appendix I of the FEIS contains the silvicultural systems that are approved and available for use on the White River National Forest. That does not mean that we must use them or will use them in forest management. The Silvicultural Standards and Guidelines provide language that will effectively direct the proper use of clearcutting on the White River National Forest and minimize impact to other forest resources. Forest-wide Standards and Guidelines also provide for the protection of soils, scenery, aquatic, and other recreational resources when using clearcutting harvest. Clearcutting timber types such as spruce/fir or mixed conifers is prescribed very infrequently on the White River National Forest. However, clearcutting in these species is a tool that can, under proper conditions, be used to achieve specific management goals.

T21 Public Concern: The FEIS should address the thinning of "dog-hair" lodgepole pine stands.

Response: The Forest does use thinning as a tool to improve forest health when it will meet mangement objectives and it is practicable and feasible. Forest health is considered a high priority on the White River National Forest, and the use of thinning is considered in all alternatives to varying levels. Chapter 3 of the FEIS displays the estimated acres to be thinned by management alternative. Most of the thinning is expected to occur in dense lodgepole pine stands. However, the amount of thinning actually conducted will depend on implementation of the management area direction and the Forest Plan Standards and Guidelines.

T22 Public Concern: The Forest Service should emphasize uneven-aged timber management systems.

Response: The White River National Forest has retained the use of uneven-age management in the 2002 Forest Plan for most forest cover types. Selective logging (the selection of individual trees for cutting) is appropriate and vital to the health of forests when used with certain species of trees or cover-types that respond well to uneven-age management, such as spruce/fir. However, trees such as lodgepole pine do not respond well to uneven-age management, so the Forest Service will continue to use even-age management systems in this cover type where it is determined to be the optimum method of regenerating the stand.

During project analysis, stands of timber are examined to see if they should be harvested and what types of silvicultural systems should be used for harvest and regeneration. Final determination of the silvicultural system applied to a site will be determined by a certified silviculturist to meet the management objectives for the landscape or stand of trees being considered for treatment. Likewise, regeneration systems are selected that meet the management objectives for the landscape or individual stands of trees, and approved by certified silviculurists.

The computer model used for the development of timber harvest schedules for each management alternative utilized both uneven-aged and even-aged silvicultural systems to predict timber yields. Based on constraints and management objectives, the model determined a schedule for cutting that included specification of the harvest acres, silvicultural system, and rotation age to apply to each analysis area.

T23 Public Concern: The Forest Service should shift its management focus from individual tree health to forest ecosystem health.

Response: The 2002 Forest Plan does focus on forest ecosystem health. However, when evaluating forest ecosystem health, we started with individual tree and stand health assessments. A current forest assessment of insect and disease infestations can be found on Pages 3-446 thru 3-449 of the FEIS. The Forest Service acknowledges that insects and disease are components of a naturally functioning forest ecosystem. Therefore, we evaluate information gathered from individual trees and stands in the context of the Historic Range of Variability (HRV) of the White River National Forest. The conclusions of this evaluation are found in Appendix D of the FEIS. The HRV provides the framework for forest ecosystem health management and for identifying some of the trade-offs implicit with proposed vegetation management activities.

T24 Public Concern: The Forest Service should justify or abandon the notion that management activities mimic ecological processes.

Response: The White River National Forest does not assume that harvest practices will equate to natural disturbances. But the Forest will attempt to simulate such disturbances (in terms of size and shape) as much as possible. Harvesting can simulate certain aspects of disturbances, such as extent of area affected or resulting species composition. Partial cutting removes mostly similar diameter merchantable trees, much as a fire kills usually thinning-bark trees, and thereby having similar effects on removing competition. But we fully realize that some ecological functions arising from, or interacting with, fire, insect, and disease cannot be duplicated by harvesting.

T25 Public Concern: The Forest Service should reconsider the necessity to manage for aspen.

Response: Refer to response to Public Concern T56.

T26 Public Concern: In the FEIS, the Forest Service should acknowledge the existence of climax aspen stands.

Response: Climax stands of aspen do exist on the White River National Forest. Refer to Response to Public Comment T56.

T27 Public Concern: The Forest Service should base timber harvest for forest health upon individual stand health.

Response: Refer to response to Public Concern T22.

T28 Public Concern: The Forest Service should limit active management to urban interface areas.

Response: Management Area 7.1, Intermix, provides management emphasis and guidance for urban interface areas. Management actions within Intermix management areas are focused on influencing vegetation composition and structure to provide visual screening and to minimize fuel-loading patterns in order to reduce fire hazard. Wildlife habitat within the urban interface is managed to provide adequate cover for big game species between winter and summer ranges.

Active vegetation management would not be compatible with the theme and desired condition identified for the Intermix management areas. Therefore, these areas are not part of the suitable timber land base and active vegetation management is not planned on a sustainable basis. However, vegetation management practices may occur in concert with recognition of surrounding private land values and described resource objectives.

T29 Public Concern: The Forest Service should develop programs to involve private citizens in harvesting timber for forest health.

Response: The Forest Service directive system is the primary basis for management and control of all internal programs, and serves as the primary source of administrative direction to Forest Service employees. The legal authorities, policies, standards, and procedures for establishing "Forest Management Leaseholds" through the directive system will be addressed at a regional or national level and are inappropriate at the forest planning level.

We have had success in using the personal use firewood program to accomplish vegetation resource objectives on the White River National Forest. The personal use firewood program consists of issuing permits to private citizens for the harvesting and removal of trees as fuelwood. The use of the firewood program has been effective in areas where access is limited, economic feasibility is marginal, or the need to reduce disturbance to sensitive natural resources is necessary. We will continue to develop and utilize the personal use firewood cutting program as an effective vegetation management tool when appropriate to meet specific resource objectives.

T30 Public Concern: The Forest Service should emphasize uneven-aged timber management systems.

Response: As stated in FEIS Appendix B, when planning individual timber projects under 1984 Forest Plan standards and guidelines, certain patterns in harvest methods selected emerged. One of these patterns was an emphasis of shelterwood silvicultural systems used in spruce and fir stands. Because these patterns represent results of numerous site-specific, interdisciplinary analyses, it is appropriate to include these patterns in the SPECTRUM model. This is our best estimate of what will happen at the project planning stage. The changes in standards and guidelines from the 1984 Forest Plan that are embodied in the FEIS alternatives may result in significant deviation from these patterns. The interdisciplinary team discussed this issue in light of additional changes in standards and guidelines and determined that those harvest patterns are still our best estimate of what will happen at the project planning stage.

T31 Public Concern: The FEIS should clarify whether pre-commercial thinning will occur on White River National Forest.

Response: Pre-commercial thinning may occur on the White River National Forest in accordance with Forest-wide Guideline #4 (2002 Forest Plan, Chapter 2, Silviculture). A site-specific analysis is required to ensure conditions of Forest-wide Guideline are met before a decision to pre-commercially thin is made.

Suitability for Harvest

T32 Public Concern: The Forest Service should clarify the apparent conflict within the preferred alternative between total acres of suitable timberlands and proposed limitations on roadbuilding.

Response: The DEIS incorporated a decision on the White River National Forest's Access and Travel Management Plan. Given the complexity of trying to analyze both decisions, we decided to separate the Land and Resource Management Plan decision from the Access and Travel Management Plan decision. The FEIS and accompanying Record of Decision (ROD) will disclose the Land and Resource Management Plan for the White River National Forest.

Following the release of the 2002 Forest Plan ROD and FEIS, we will resume our analysis of the Access and Travel Management Plan for the selected Forest Plan alternative. The Access and Travel Management Plan will set guidelines addressing road construction and reconstruction for the White River National Forest.

T33 Public Concern: The Forest Service should explain why the spruce/fir component is excluded from the suitable timber base in some management areas.

Response: The spruce/fir component is specifically excluded from the suitable timber base in Management Area 5.5 – Forest Carnivores. This management area is specifically designated to manage habitat components important to lynx and wolverine. The spruce/fir vegetation provides important biological habitat component for lynx. Therefore, spruce/fir vegetation in not actively managed or scheduled for harvest and is excluded from the suitable timber base in Management Area 5.5. Although spruce/fir is excluded

from the suitable timber base, vegetation treatments with in spruce/fir stands may be allowed to enhance habitat characteristics for lynx and wolverine.

T34 Public Concern: The FEIS should classify much of the land allocated to Category 5 as unsuitable for harvest.

Response: The process for determining whether a particular parcel might be suitable for timber production is described in the Timber Analysis found in Appendix B of the FEIS. Five standards were used to determine whether a particular parcel might be suitable for timber harvest. Two of the standards did include evaluations for adequate reforestation and protection of soil productivity. The land allocated to Category 5 management areas met all five suitability standards. However, active vegetation management through timber harvesting was not consistent with the goals and objectives of Management Areas 5.41 and 5.42.

Of the seven Category 5 management areas, five were designated as part of the "suitable" land base and contribute to the allowable sale quantity. The only areas that have timber production as a goal are 5.12, 5.13, 5.40, 5.43, and 5.45. In these management areas, timber is managed on a regulated basis. Timber harvest may occur within management areas 5.41 and 5.42 to maintain or enhance big game habitat, but timber production is not a goal for these lands, and they are not included in the Forest timber harvest schedule.

T35 Public Concern: The Forest Service should remove Bar HL Park and Coulter Mesa from the suitable timber base.

Response: The Forest Service developed a wide range of management alternatives. The proposed management area direction for the Bar HL Park/Coulter Mesa area varies under each management alternative.

The Bar HL Park/Coulter Mesa area is designated as part of the suitable timber land base in Management Alternatives B, C, D and F.

In Management Alternative I, proposed management direction for the Bar HL Park/Coulter Mesa area would be split between Management Areas 1.31 and 5.13. Management Area 1.31. (Backcountry Recreation—non-motorized) is not part of the suitable timber land base. While Management Area 5.13 (Forest Products) is part of the suitable timber land base.

Under Management Alternative E, the Bar HL Park/Coulter Mesa area would be managed for dispersed recreation (Management Area 3.4) and is not part of the suitable timber land base.

The discussion of environmental consequences on the direct, indirect and cumulative effects on the environment that would result from vegetation management and output levels of each alternative is presented in Chapter 3 of the FEIS.

ASQ and Harvest Levels

T36 Public Concern: The Forest Service should not base Allowable Sale Quantity on predicted budget levels.

Response: The allowable sale quantity (ASQ) is determined at the full implementation level and is not constrained by budget. The Forest Service does not view ASQ as a target; rather, ASQ is a measure of the White River National Forest's capacity to produce a

sustainable supply of timber on suitable timber lands given full program funding and inherent constraints (see the Standards and Guidelines). ASQ is displayed for each management alterative in Table 152 of the FEIS.

The ASQ would normally be used as the upper limit on annual harvest in the first decade. However, based on historic supply and demand and existing mill capacity, we determined that the harvest levels associated with limited budgets were more appropriate for the analysis. Two budget levels were analyzed for each management alternative. The first is based on the White River National Forest's "experienced budget" level, which represents the average annual budget between 1997 and 2000. The second is the "full budget" level, which represents the funding of all programs at a level one and one-half times as much as the experienced budget level. The purpose of analyzing two budget levels was to describe to the public and the decision maker how production levels and effects change under varying budgets. The timber volume harvested under the "experienced budget" and "full budget" levels is not termed "allowable sale quantity (ASQ)" but rather is called "chargeable volume offered." The use of budget constraints in determining "chargeable volume offered" is explained in the Timber Section of Appendix B of the FEIS. The titles in Tables 153 and 154 have been revised to reflect chargeable volume offered rather than ASQ.

Ultimately, the level of funding the Forest receives to implement the 2002 Forest Plan, and how these funds are prioritized and distributed nationally and regionally, will be determined through congressional appropriations.

T37 Public Concern: The Forest Service should more accurately represent the level of previous human disturbance to White River National Forest.

T37.1 Timber Harvest As A Percentage Of The Actual Timber Base

T37.2 Total Land Area Disturbed Post-Settlement

Response: The discussion of cumulative effects of timber harvesting was to show how much of the White River National Forest has been affected by harvesting. The approach to reflect that portion of the Forest as a percentage of the total forest and total timber-covered lands is merely to show how timber resource management compares to lands not managed for such resources. We feel this is an accurate and appropriate representation.

T38 Public Concern: The Forest Service should disclose the financial and economic criteria used to determine ASQ.

Response: FEIS Appendix B, Description of the Analysis Process, includes information on the financial and economic criteria used to estimate ASQ (allowable sale quantity), displays the costs of various activities associated with managing timber, road costs, and revenues.

Appendix B also includes a discussion of the financial and economic implications of timber management including budget and present net value information for each FEIS alternative, and financial and other information about the timber program with different sets of assumptions for harvest and budget levels.

T39 Public Concern: The Forest Service should explain the significant variation between the ASQ and the actual Timber Sale Program.

Response: See response to Public Concern T36.

T40 Public Concern: The Forest Service should adjust timber sale goals to better reflect actual bid, cut, and stumpage receipt data.

Response: The timber analysis for the 2002 Forest Plan used actual cost and revenue data to determine timber sale program quantity. The coefficients that were used in the timber harvest schedule model utilized cost, revenues, and production functions for timber related activities and outputs over the last decade for the White River National Forest. In some cases, data from adjacent National Forest and the Region were included in the evaluation. A summary of the coefficients included in the model are shown in Tables B-6, B-7 and B-8 of Appendix B – Description of the Analysis Process, Timber Analysis.

The Forest also cautions that the history of the timber sale program is not a definitive predictor of future net benefits or net revenues.

T41 Public Concern: The Forest Service should assure that certain timber volume counts towards ASQ.

T41.1 All Measurable Timber

T41.2 Timber Harvested From Ski Areas

Response: The allowable sale quantity (ASQ) is derived from acres designated as suitable for timber harvest. Therefore, timber harvesting as part of the suitable timber land base that contribute to the allowable sale quantity is allowed only in management areas 5.12, 5.13, 5.4, and 5.43. In addition, management area 5.45 allows for harvesting of aspen and lodgepole pine as part of the suitable land base that contributes to the ASQ.

Other management areas may allow timber harvest, though for the purpose of meeting specific resource objectives other than wood production. Timber harvest in these management areas (unsuitable timber land base) were not scheduled and included in calculating the ASQ.

To contribute timber volume harvested from the unsuitable timber land base towards the ASQ would be inappropriate and artificially inflate ASQ attainment. Therefore, the Forest Service has made a distinction between “chargeable” volume that is harvested from the suitable timber land base and contributes to the ASQ and “other vegetation management” (OVM) volume that is harvested from the unsuitable timber land base and does not contribute to the ASQ. Both “chargeable volume” and “other vegetation management” will contribute to the overall timber sale program quantity (TSPQ). Summaries of timber sale program quantity for all alternatives for the 10-year period of the Forest Plan are presented in tables in Chapter 3 of the FEIS.

T42 Public Concern: The Forest Service should assure that certain timber volume does not count towards ASQ.

T42.1 Timber from Management Prescription 5.12

T42.2 National Forest Lands in Summit County

Response: See response to Public Concern T33. We have determined that Management Area 5.12, General Forest and Rangelands, should reflect the range of conditions and management that occurs on the White River National Forest, including opportunities for timber management. Therefore, tentatively suitable timber lands within Management Area 5.12 are designated as suitable for timber production. Timber harvest consistent with 5.12 management area direction will contribute towards accomplishment of the allowable sale quantity.

T43 Public Concern: The Forest Service should abandon the goal of providing a non-declining flow of timber.

Response: 36 CFR 219.16a requires the Forest Service to manage for non-declining flow of timber products over time. This means we cannot intentionally undertake a timber harvest schedule that, according to our best information and analysis, will result in a decline in timber harvest in the future. As shown in FEIS Appendix B, such an analysis includes consideration of:

- Lands suited for timber production;
- Existing conditions on these lands (such as species, size and density);
- Various treatment methods available for given conditions (i.e., treatment options available);
- Yields, costs, and production functions associated with each treatment option;
- Legal constraints on timber management;
- Constraints on timber management to protect other resources;
- Constraints on timber management to enhance other resource values.

In such an analysis, we make our best estimate of how goals, objectives, standards, and guidelines relative to other resources affect management options available and possible harvest schedules.

This analysis to determine ASQ (allowable sale quantity) and the associated non-declining harvest schedule needs to be periodically repeated, at least as often as the forest plan is redeveloped/reissued. But significant changes in any of the above factors would necessitate a reanalysis to ensure non-declining flow, for example, a catastrophic fire that alters existing conditions. For an analysis at a given point in time, we use the best information available to do the analysis.

T44 Public Concern: The Forest Service should reduce ASQ levels in the FEIS.

T44.1 Spruce/Fir

T44.2 Reduce ASQ significantly in the Upper Blue River Basin

T44.3 Reduce ASQ in the Preferred Alternative

Response: The preferred alternative and its associated ASQ present's a balance of providing for the many competing uses on the National Forest. The White River National Forest has modeled ASQ using the best information, tools, and knowledge available. The

Implementation of the FORPLAN and SPECTRUM models has been checked. The harvest level and ability of the FORPLAN and SECTRUM model to estimate ASQ will be monitored throughout the life of the plan.

T45 Public Concern: The Forest Service should adjust ASQ levels regularly based on monitoring results.

Response: As discussed in response to Public Concern T42, the analysis to determine ASQ (allowable sale quantity) and the associated non-declining harvest schedule needs to be periodically repeated, at least as often as the forest plan is redeveloped/reissued. But significant changes in landscape conditions (such as a catastrophic fire) or monitoring results that show some assumptions to be invalid would also necessitate a reanalysis to ensure non-declining flow.

T46 Public Concern: The Forest Service should adjust Allowable Sale Quantity to account for helicopter logging in roadless areas.

Response: The allowable sale quantity (ASQ) calculation does include some limited harvest in "suitable" roadless areas. The lands designated for timber production include both areas with existing roads and areas that are partially or entirely roadless. The decision of what harvest methods to use (for instance, helicopter versus conventional) in harvesting timber in "suitable" roadless areas is a decision made at the project planning stage. Harvest method is not a forest plan level decision.

For timber harvest in roadless areas, the ASQ analysis assumed conventional logging over helicopter logging as a matter of economic feasibility. Harvest method will be re-evaluated during specific project planning for a given "suitable" roadless area, and the optimum harvest method will be determined at that time.

T47 Public Concern: The Forest Service should disclose the amount of "unsuitable" land expected to be harvested for ecosystem restoration reasons that is not included in ASQ projections.

Response: The amount of "unsuitable" land that is expected to be harvested for ecosystem restoration and other resource objectives is displayed as "Other Vegetation Management (OVM)" in Tables 153 and 154 of the FEIS. The tables display the projected timber sale program quantity (TSPQ) for the first decade of the 2002 Forest Plan.

T48 Public Concern: In the timber market assessment, the Forest Service should consider local mill expansion.

Response: The timber market assessment used the best information available. The timber market is very dynamic and subject to many variables outside of the White River National Forest's direct influence. Therefore, timber yields were analyzed at "experienced budget" and "full budget" levels for each Management Alternative (FEIS, Appendix B, Tables 140, 141, 150 and 151). Timber yields at "full budget" level are approximately 150% greater than the timber yields for the "experienced budget" level. The increase timber yields analyzed under the "full budget" level are intended to capture fluctuations in the White River National Forest's annual timber budget and possible changes in the local timber mill capacity.

T49 Public Concern: In the timber market assessment, the Forest Service should recognize that many regional mills have multiple sources of raw materials.

Response: The Timber Market assessment completed for the White River National Forest identified the forest as a small supplier with respect to national and international markets. However, the Forest is a major supplier of timber to some regional mills. Although the White River National Forest is a major timber supplier to some regional mills, the Market Assessment does not recognize the White River National Forest as the sole supplier of timber to any one regional mill.

T50 Public Concern: The Forest Service should not attempt to meet Colorado's demand for wood products from instate national forest lands.

Response: The supply of timber from the White River National Forest is not solely determined by Colorado's demand for wood products but dependant on several factors identified below.

- The number of acres designated as "suitable" timber land;
- Inherent vegetation management constraints imposed by Forest Plan standards and guidelines.
- The calculation of the allowable sale quantity (ASQ) with information provided by the factors above. The ASQ set the upper limit on the amount of timber to be offered from the Forest.
- The annual Forest timber budget, which is available to plan, prepare, sell and administer timber sales.

The allowable sale quantity (the upper limit) for the preferred Alternative K is approximately 32.5 million board feet. Ultimately, the level of timber funding the Forest receives to implement the Revised Forest Plan will have a greater influence over the Forest timber supply than Colorado's demand for wood.

A suggestion was made to evaluate opportunities to utilize alternative substitutes for wood products. An analysis to evaluate opportunities for recycling, possible wood product substitutes and alternative building materials is out side the scope of the Forest Plan analysis.

Salvage

T51 Public Concern: The Forest Service should conduct an environmental assessment and watershed-scale analysis of the timber salvage program.

Response: The purpose of the 2002 Forest Plan is to provide guidance for all resource management activities on the White River National Forest. Required environmental impact statements and/or environmental assessments to disclose environmental affects from site specific timber salvage project(s) will be completed separate from the 2002 Land and Resource Management Plan.

T52 Public Concern: The Forest Service should prohibit salvage logging in old growth stands.

Response: Inventoried old growth stands in spruce fir stand types are administratively withdrawn from lands designated as suitable for timber production in all alternatives (refer to Table B-1 in Appendix B). Vegetation management (which includes salvage logging) in inventoried old-growth stands will be limited and only allowed when necessary to meet specific biodiversity and old-growth values. Biodiversity Standard 5 (Forest Plan, Chapter 2, Section 2 – Biological) provides protection of approximately 30% of the late successional spruce fir stands from active vegetation management activities to assure the maintenance of habitat conditions for late successional dependent species. Late successional forest acreage and distribution, including old growth, are expected to increase significantly across the Forest in all alternatives. A full discussion on the management of late successional forest, including old growth and be found in Appendix FF of the Plan.

T53 Public Concern: The Forest Service should apply the proposed 40-acre maximum opening size to salvage operations.

Response: Silviculture Standard 5 has been retained unchanged in the 2002 Forest Plan. Silvicultural Standard 5 is now listed in Chapter 2. The White River National Forest has chosen to incorporated the standard regarding the maximum opening size from the *Rocky Mountain Regional Guide*, Amended May 1992, Technical Corrections June 1996. The standard provides three exceptions to the maximum opening size of 40 acres. It is assumed that salvage operations are linked to the second exception regarding natural catastrophic conditions. Under this exception, the forested opening exceeding 40 acres in size was a "result of the catastrophic condition" and not a direct result of even-age management or salvage harvest operations.

Forest cover type, wildlife edge effect and historic range of variability, in additional to other resource concerns will be evaluated, analyzed and disclosed during site specific project analysis when considering even-age management or salvage harvest operations as the result of natural catastrophic conditions.

T54 Public Concern: The Forest Service should emphasize uneven-aged timber management systems.

Response: Refer to response to Public Comment T21.

Silvicultural Goals and Objectives, Standards and Guidelines

T55 Public Concern: The Forest Service should clarify that silviculture standards and guidelines do not apply within management area 8.25.

Response: Forest-wide standards and guidelines for the protection or management of different forest resources apply to all areas of the White River National Forest, and are used with additional standards and guidelines included with each management area prescription.

Forest-wide standards and guidelines are designed to complement individual management area direction. The standards and guidelines for silviculture (2002 Forest Plan, Chapter 2) provide exceptions for minimum reforestation requirements when the management area is not part of the suitable timber land base, as is the case with

Management Area 8.25. They also provide discretion regarding implementation based on resource management objectives or special resource considerations. Resource management objectives and special resource considerations are described for each management area in Chapter 3 of the 2002 Forest Plan.

Forest-wide silvicultural standards and guidelines will not conflict with the maintenance and development of ski trails at four-season resorts given the exceptions and discretion identified above.

T56 Public Concern: The Forest Service should ensure that timber program goals are consistent with other forest-wide goals.

Response: Forest-wide goals are broad statements that describe overall conditions that the Forest Service will strive to achieve. Goal 2.4—Forest Products (Timber Program Goals) is one of many goals comprising the overall Forest-wide goals that will enable the Forest Service to monitor its progress and determine future management needs for all forest resources.

The timber program goals and objectives will comply with legal mandates, including laws that direct the Forest Service to manage for the production of timber products (Organic Administration Act, Sustained Yield Management Act, Multiple-Use Sustained-Yield Act), and laws that mandate protection of resources such as the Organic Administration Act, Sustained-Yield Management Act, Clean Water Act, Multiple Use-Sustained Yield Act, National Environmental Policy Act, Endangered Species Act, North American Wetlands Conservation Act.

T57 Public Concern: The FEIS should clarify whether seral or climax stands will be harvested to meet biodiversity goals for aspen.

Response: In Chapter 3, Topic 6 – Timber Management, under the section heading Environmental Consequences, it mentions that timber harvesting may be done "to accomplish biodiversity goals". Biodiversity goals for forested vegetation are to maintain structural and age class diversity within individual species cover types as well as maintaining species cover type diversity, all within the historic range of variation for the White River National Forest. A discussion of the historical range of variation for forested vegetation can be found in Chapter 3 of the FEIS under Topic 1, Part 3; Section 3 – Forested Vegetation. The 2002 Forest Plan retains the opportunity to manage both seral and climax aspen stands. Depending on site specific analysis of individual aspen stands, it may be necessary to manage and harvest seral and climax aspen stands to maintain structural and age class diversity within the historic range of variation for the aspen cover type on the White River National Forest. Site specific analysis of individual aspen stands may also determine the necessity to manage and harvest seral aspen stands to maintain tree species diversity on the White River National Forest within the historic range of variation.

T58 Public Concern: The Forest Service should restrict the annual harvest of trees 14-in and larger DBH.

Response: Scientifically defined silvicultural systems, shown by forest cover type are displayed in the 2002 Forest Plan, Chapter 2, Silvicultural Standard 1, Table 2-5; page 2-12. These silvicultural systems were adopted by the White River National Forest from the *Rocky Mountain Regional Guide,* Amended May 1992, Technical Corrections June 1996.

The acceptable silvicultural systems displayed in Table 2-5 were selected to ensure proper management of forested vegetation on the White River National Forest and accomplishing many of the Goals and Objectives identified in 2002 Forest Plan.

None of the scientifically define silvicultural systems incorporate a restriction of 14-in and larger DBH for trees harvested. Incorporation of the proposed 14-in and larger DBH harvest restrict would significantly reduce the effectiveness of implementing the approved silvicultural systems for the White River National Forest. The Forest is unaware of any scientifically define silvicultural system for all forest cover types based on a 14-in and larger DBH harvest restriction.

T59 Public Concern: The Forest Service should clarify the definition of stand openings.

Response: Table 2-7 in the 2002 Forest Plan displays the guidelines for when a stand opening is no longer considered an opening. A forest stand must meet criteria of trees per acre and height of trees in order to qualify as an opening.

T60 Public Concern: The Forest Service should reduce the proposed 40-acre maximum opening size.

Response: Silviculture Standard 5 has been retained unchanged in the 2002 Forest Plan. Silvicultural Standard 5 is now listed in Chapter 2, Section 2. The White River National Forest has chosen to adopt the standard regarding the maximum opening size from the *Rocky Mountain Regional Guide*, Amended May 1992, Technical Corrections June 1996. Silvicultural Guideline 13 listed in Chapter 2 of the 2002 Forest Plan also provides guidance for managing created forested edge when proposing artificial forest openings. Forest cover type, wildlife edge effect and historic range of variability, in additional to other resource concerns will be evaluated, analyzed and disclosed during site specific project analysis when determining actual opening size.

T61 Public Concern: The Forest Service should change the criteria in Guideline 14 to prevent premature harvesting of areas adjacent to openings.

Response: Silviculture Guideline 14 has been retained unchanged in the 2002 Forest Plan. Silvicultual Guideline 14 is now listed as Silvicultural Standard 11 in Chapter 2, Section 2; page 2-14. The White River Forest has chosen to adopt the guideline regarding the management of artificially created openings from the *Rocky Mountain Regional Guide*, Amended May 1992, Technical Corrections June 1996.

T62 Public Concern: The Forest Service should correct inconsistencies between objectives and stated outcome measures of Goal 2.4.

T62.1 Objective2.4a

T62.2 Objective 2.4b

Response: Table 15 Outcome or activity measures and trends for forest plan goals by alternatives found in Chapter 2, The Alternatives, pages 2-52 thru 2-60 in the FEIS has been edited and inconsistencies corrected. The Outcome or Activity Measure for Allowable Sale Quantity, Timber Program Sale Quantity and Chargeable and non-chargeable timber offered for sale has been edited to reflect the correct unit of measure; thousand cubic feet (MCF). Allowable Sale Quantity is not constrained by budget and is therefore displayed indifference to 'experienced' or 'full' implementation budget level.

T63 Public Concern: Goal 2.4b should include objective evaluation criteria.

Response: Goal 2.4 and Objective 2.4b in the Draft Forest Plan have been reworded and replaced by Objective 2c and Strategy 2c.2 in Chapter 1, Goal 2 Multiple Benefits to People, page 1-10; of the 2002 Forest Plan. Objective 2c and Strategy 2c.2 have been written to include objective evaluation criteria and dropped the reference to the phrase "environmentally responsible harvest".

T64 Public Concern: The Forest Service should eliminate Objective 2.4a from the FEIS.

Response: Objective 2.4a in the Draft Forest has been re-titled Strategy 2c.1 in Chapter 1, Goal 2 Multiple Benefits to People, page 1-11; in the 2002 Forest Plan. The wording of Strategy 2c.1 is unchanged from Objective 2.4a. As stated in Chapter 1, Forest-wide Goals and Objectives, Introduction, page 1-1, strategies are not targets, but objective measurable steps taken to accomplish goals. Strategy 2c.1 has been retained in the 2002 Forest Plan to accomplish Forest Goal 2 Multiple Benefits to People.

T65 Public Concern: The FEIS should include a standard regarding road closures for management prescription 5.13.

Response: Infrastructure guidelines listed for Management Area 5.13 are tiered to Forest Wide Standards and Guidelines. The standards and guidelines for closing or restricting roads to public use are provided for under Infrastructure Standards and Guidelines (2002 Forest Plan, Chapter 2, Section Five, Administrative). Decisions on whether to close newly constructed roads to public use within Management Area 5.13 will be determined under a site-specific analysis. Guidance for road management will be developed and analyzed under the White River National Forest's Access and Management Plan.

T66 Public Concern: The Forest Service should retain Guidelines 1 and 3 for management of insect and disease outbreaks.

Response: Both guidelines have been retained in the Final LRMP. Forest-wide Guideline #1 under Disturbance Processes for Insect and Disease and Management Area 4.23 guideline #1 under Insect and disease.

T67 Public Concern: The Forest Service should reword Standard 2 to ensure compliance with NFMA.

Response: Silvicultural Standard 2 listed in Chapter 2 of the 2002 Forest Plan, page 2-12 has been reworded to match language from the National Forest Management Act. NFMA section 6g. 16 USC 1994. The reference to the word "should" is deleted from the standard.

Restocking, Regeneration and Cost

T68 Public Concern: The Forest Service should adopt elevation limits for timber harvest.

Response: The 2002 Forest Plan did utilize elevation limits in the timber analysis to establish an allowable sale quantity (Appendix B, Timber Analysis, Lands Suited for Timber Production). However, these elevation limits used in the analysis are general guideline and subject to site-specific evaluation. A certified Forest Silviculturalist will conduct a site-specific evaluation before deciding to harvest timber on higher elevations.

The silviculturalist must determine that Forest-wide Standards 1, 2 and 4 (2002 Forest Plan, Chapter 2, Silviculture) will be met to assure adequate restocking within five years of final harvest.

T69 Public Concern: The Forest Service should reveal the criteria used to determine aspen stand type and likelihood of regeneration.

Response: Aspen stands proposed for vegetation treatment are evaluated by a Forest Service certified Silviculturalist during site-specific project analysis. The silviculturalist recommends Assurance and Findings of Facts pursuant to National Forest Management Act (NFMA) be made in project decisions, including reforestation will occur within five years of final harvest when treatments are in support of timber management. Documentation of the analysis, which includes determination of aspen type, recommended silvicultural treatments, and assurance of regeneration; is provided in the Silvicultural Prescriptions and Silvicultural Report filed with the site-specific project record.

T70 Public Concern: The Forest Service should restrict browsing herbivores from clearcut aspen patches for six-eight years to ensure successful regeneration.

Response: Silvicultural Standards 2-4 found in Chapter 2, page 2-12 of the 2002 Forest Plan addresses the requirement for successful regeneration and restocking after final removal. The evaluation of required regeneration protection is conducted during site-specific project analysis. When regeneration protection is determined to be necessary to comply with Silvicultural Standards 2-4; the appropriate method and duration of regeneration protection measures are analyzed and incorporated into the site-specific project decision.

T71 Public Concern: The Forest Service should place greater emphasis on reforestation after even-age treatments.

Response: The 2002 Forest Plan (Chapter 2, pages 2-12 thru 2-15) developed the following five Silvicultural Standards: 2, 3, 4, 7 and 9; and Silvicultural Guidelines 3 and 5, which place an emphasis on reforestation after even-age treatments. These Silvicultural Standards and Guidelines were developed to address all aspects of reforestation after even-age treatments, from minimum stocking levels, and survival requirements, required surveys and monitoring, protection against disease, and the creation of favorable microsites.

T72 Public Concern: The FEIS should require higher minimum stocking levels.

Response: The 2002 Forest Plan has adopted minimum stocking levels as established in the *Rocky Mountain Regional Guide*, Amended May 1992, Technical Corrections June 1996. The guide establishes specifications for acceptable forest cultivation practice on the National Forest in the Rocky Mountain Region.

T73 Public Concern: The Forest Service should use only native plant materials in revegetation and restocking efforts.

Seed Collected From Same Area And Aspect

Response: Biodiversity Standard 1 found in Chapter 2 of the 2002 Forest Plan, Section 2; directs the White River National Forest to use genetically local native plant species for re-vegetation efforts. The Standard refrained from requiring "only" genetically local

native plant species, because there are still limitations on technology and economic feasibility. The White River National Forest has emphasized the use of genetically local native plant species and will continue to strive on the expanding the use of genetically local native plant species under the 2002 Forest Plan.

T74 Public Concern: The Forest Service should monitor and disclose the results of post-harvest regeneration.

Response: Silvicultural Standard 4 (Chapter 2 of the 2002 Forest Plan, Section 2) requires the White River National Forest to first-year and third-year restocking surveys, in addition to a fifth-year reforestation certification exam. The results of the reforestation surveys and certification exams will be incorporated into Forest Plan

Monitoring (2002 Forest Plan, Chapter 4) under Monitoring Question - Implementation Monitoring 1.

T75 Public Concern: The Forest Service should not conduct below-cost timber sales.

Response: Refer to response to Public Comments T112 and T113. According to the *timber sale program information and reporting* (TSPIRS), the economic account for the White River National Forest is generally above cost when all of the resource values, market and non-market, are considered for present net value (refer to FEIS, Chapter 3, Topic 6 – Timber Manaement, Figure 56).

T76 Public Concern: The Forest Service should disclose in detail White River National Forest's financial losses from the timber sale program.

Response: The White River National Forest's timber revenues and expenses are discussed in Chapter 3 of the FEIS, Topic 6- Timber Management, under the section Below-cost Timber Sales Program. The information is also displayed in Figure 57 – Timber Sales Revenues and Expenses in the same section.

T76.1 Include All Costs Of Timber Sale Administration In Profit/Loss Calculations

Response: Refer to response to Public Comment T77. The cost of Timber Sale Administration is displayed in Appendix B – Description of the Analysis Process, Timber Analysis Section, Table B6 – Cost and Production Functions in Sectrum.

T77 Public Concern: The Forest Service should use more accurate methods of estimating future stumpage prices and timber program revenues.

T77.1 Use Longer-Term Averages

T77.2 Report Stumpage Rates For Lodgepole Pine And Spruce Separately

T77.3 Account for the Reduced Supply of Dead Spruce Trees

Response: A forecasting future stumpage price is very difficult as with any free market commodity. The timber-stumpage market is highly volatile and subject by many variables outside of the White River National Forest's direct influence. The Forest used stumpage information over the past four years adjusted for inflation to estimate future stumpage prices. The cost and production values used in the Spectrum model can be found in Appendix B of the FEIS under the Timber Analysis. Given the difficulty, uncertainty and unreliability of estimating long-term stumpage prices, it is impossible to definitively project stumpage prices into the future. The Forest has analyzed current stumpage market information and established a procedure to calculate future stumpage market prices

T78 Public Concern: The Forest Service should abandon use of the "stewardship" timber sale designation as a means to justify below-cost sales.

Response: "Stewardship" projects are authorized under Section 347 of the FY 1999 Omnibus Appropriations Act and outside of the scope of the White River National Forest Plan. These "stewardship" projects are intended to provide a means for pilot-testing an array of potential new authorities for giving national forest managers greater administrative flexibility to improve forest conditions and potentially help meet the needs of local communities. The White River National Forest has been granted specific "Stewardship" authority for the Upper Blue Stewardship project. The "Stewardship" authority is set to expire at the end of Fiscal Year 2004. A decision to renew or extended the "Stewardship" to additional projects will authority will be re-evaluated by congress at that time.

T79 Public Concern: The Forest Service should only allow below-cost timber sales if harvest is the best management option for achieving forest health.

Response: The following Management Areas allow for vegetation management for achieving forest health or other resource objectives other than wood production (2002 Forest Plan, Chapter 3): 1.41,1.2, 3.1, 3.21, 3.31, 3.32, 3.4, 3.5, 4.2, 4.23, 4.3, 4.32, 4.4, 5.41, 5.42, 7.1, 8.21, 8.25, and 8.32. In some of these areas, necessary vegetation management may take the form of timber harvesting, In these situations timber harvest is use as a tool to achieve forest health or other resource objectives. Given the objective is not wood production; economic efficiency may not be possible. However, the full value of maintaining or achieving forest health or other resource objectives is not quantatively reflected in the economic efficiency of the timber harvest.

T80 Public Concern: The Forest Service should eliminate timber harvest in areas managed for backcountry non-motorized recreation.

Response: Management Area 1.31, Backcountry recreation—non-motorized area, is not part of the land base suitable for timber harvest. Vegetation management is not scheduled in this area and will only be used when necessary to meet specific resource objectives of maintaining non-motorized recreation near the primitive end of the recreation spectrum.

T81 Public Concern: The Forest Service should mitigate the effects of timber harvest in areas with heavy recreational use.

Response: Programmatic direction in the Forest Plan regarding mitigating the effect of timber harvesting have been developed and are found in two sections of the 2002 Forest Plan. The first set of mitigation measures can be found in the Forest-wide Standards and Guideline for recreation in Chapter 2. The second set of mitigation measures can be found in the Standards and Guidelines for Category 3 Management Areas (2002 Forest Plan, Chapter 3, Category 3). Additional impacts and mitigation measures are considered and evaluated at site-specific project level analysis when planning timber sales in areas with heavy recreation use.

T82 Public Concern: The Forest Service should continue to permit fuel-wood cutting in White River National Forest.

Response: The 2002 Forest Plan will continue to permit fuel-wood cutting in the White River National Forest. The opportunity to provide desired products, and issuing miscellaneous product permits is addressed in Objective 2c and Strategy 2c.2 found in

Chapter 1, Goal 2 Multiple Benefits to People. The opportunity to cut fuel-wood is also provided for under Special Forest Guideline 1 found in Chapter 2, Section 2, Biological. Projected fuel-wood harvested for each management alternative is displayed in Table 147 of the FEIS, Topic 6 - Timber Management.

T83 Public Concern: The Forest Service should expand the timber market assessment to include a broader market perspective.

Response: In 1997, Douglas Rideout of Colorado State University completed an administrative study to assess the timber markets for the White River National Forest. The study utilized timber sale data gathered from fiscal years 1990–1995. The saw timber market area for the White River National Forest was determined to be regional because of the proximity to the Interstate 70 travel corridor. The Timber Market Assessment did not include a broader market perspective because the Forest is a small supplier. As a small supplier, it does not have an influence on national and/or international timber markets.

TOPIC 7
COMMUNITIES

Part 1—Communities of Place

Section 1—Demographics

T84 Public Concern: The Forest Service should choose a management plan that controls (to reduce, maintain, or enhance) regional growth.

Response: Based on independent research studies and the observations of many local residents, the magnitude and type of decisions made in the revision of this forest plan cannot control either population growth or urbanization of the area. The White River National Forest is clearly the primary factor in the fundamental attractiveness of the area, but it takes more than raw beauty and recreation opportunities to draw and accommodate new residents and tourists. Communities throughout the planning area provide products, services, and experiences that complement the forest and make visits to or living in this part of Colorado highly desirable. A recent study by BBC Research and Consulting (1997) stated this clearly: "The USFS's ability to influence the pace or nature of local economic growth and development activity off site of the forest is very limited. Increasingly, it is the land use decisions made by the local towns and counties that will determine the character and economy of the region." The ever-present views of the White River from towns and other locations throughout the area invite the notion that changes in management of the Forest, regardless of how incremental, will determine the destiny of local communities and counties. This is simply not the case. The Forest Service alone cannot control growth. The Forest Service, state and local governments, non-profit organizations, businesses, and individuals all share the burden of planning for and affecting the future together. (See our response to the next public comment for additional details.) Even then, market forces, international events, and demographic pressures in and outside of the planning area are beyond the control of any and all parties.

One way in which the White River has very modest influence upon the attractiveness and growth of the planning area is in the development or limitation of recreation opportunities. Allocations for potential ski area development vary by alternative, but the range of acres allocated to this use is very small. Where there are additions from the "no action" alternative (B), they are limited to Summit County. Standards and guidelines for limiting motorized summer recreation to designated routes is the largest change to recreation among the alternatives. Discussion of the allocations, standards, and guidelines and their potential impacts can be found in the Recreation section of Chapter 3. The employment, income, and housing impacts of these changes can be found in the Communities section of Chapter 3.

T85 Public Concern: The Forest Service should expand its analysis of urbanization and collaborate with local governments in doing so.

Response: The implementing regulations for the National Forest Management Act include a section on the coordination of planning with other public planning efforts (36 CFR 219.7). Responsibilities during forest planning include meeting with local government officials, reviewing local planning policies for objectives and interrelated impacts, and seeking resolution where conflicts are discovered. In response to comments

by local governments and others on the DEIS, a better way to accomplish these responsibilities has emerged. A pilot project of multi-jurisdictional cooperation and collaboration in land use planning and management has been developed between town, county, state, and Federal governmental entities in the Blue River basin of Summit and Grand Counties. The Northwest Colorado Council of Governments was instrumental in bringing the parties together, so that effective communication and coordination could be improved.

Much of the Communities section of Chapter 3 was revised in light of these improved coordination efforts. The analysis of urbanization and its components has been expanded in this section. Population, numbers of employees, affordable housing, transportation, jobs, and income are useful indicators of urbanization and growth. Where impacts could not be quantitatively estimated, narrative discussions of potential impacts have been provided. Each of these indicators provides a different way of looking at extent to which each alternative is neutral to or constrains growth.

Section 2—Economics

T86 Public Concern: The Forest Service should recognize the economic contribution of Wilderness areas and undisturbed natural areas to the local tourist economy.

Response: Tourism is indeed the mainstay of communities in the White River National Forest area. There is very little timber industry and mining is only prominent in Rio Blanco County. Thousands of individuals and households are dependent upon tourism (including second-homes) for their livelihood. For these reasons, the tourism effects of alternatives were analyzed in great detail in the FEIS. The results are a major part of the Communities section and Economics subsection of Chapter 3.

The tourism effects that could be analyzed in this FEIS result from visitors that recreate on the White River National Forest. There is a large portion of tourism that occurs on private lands, but exists in large measure only because of the scenic beauty that surrounds these communities. That scenic backdrop is provided by the White River National Forest. The amount of tourism in the area that can be attributable to this beautiful setting may not be completely separable or quantifiable. Even though it is excluded from the quantified economic contributions of the Forest, it is tremendously important and recognized qualitatively. The effects of each alternative upon scenery can be found in the Communities section and Economics subsection of Chapter 3.

T87 Public Concern: The Forest Service should adopt the wilderness recommendation in Alternative I for its benefits to tourist-related business.

Response: Please see the response to concern T85.

T88 Public Concern: The Forest Service should address the construction of housing on national forest land for local service industry employees.

T88.1 Build Public Housing

T88.2 Do Not Build Public Housing

Response: The Forest Service is concerned about the problem of affordable housing for low and middle-income workers in this part of Colorado. The problem affects operations of the White River National Forest as well as other government agencies and local

businesses. Seasonal and permanent employees of the Forest often have great difficulty locating housing within their financial means, thus affecting the pool of qualified candidates. The search for effective solutions to these problems is a regular topic of discussion with local governments and businesses.

Land exchange is one tool that can be used to help address the problem. Lands may be traded to better achieve mandated National Forest management objectives. If objectives of local communities can also be accommodated through such trades, even greater benefits can be realized. While there are various on-going issues regarding the processes and procedures for land exchanges, such transactions offer great potential to assist community and housing needs. Because land exchanges are done on a site-specific basis, they are not addressed in detail in this FEIS or the forest plan.

Some parties have advocating using National Forest lands for the development of public housing. The Forest Service does not have the authority to permit public housing on National Forest lands.

T89 Public Concern: The Forest Service should fully evaluate the economic consequences of limitations on ski area expansion.

Response: The method for projected future demand for skiing underwent a major overhaul from the DEIS for the FEIS. The methods and results are discussed in the Ski-based Resorts section of Chapter 3 and more fully explained in Appendix B. Estimates are now based on the best data available from the National Ski Areas Association, Colorado Ski County USA, and demographic projections of local and Front Range communities (Center for Business and Economic Forecasting, Inc, 2001). Quality of skiing was also a major consideration in the use and impact estimates. Differences in ski area conditions, expansion potential, location, and infrastructure constraints (including communities, highways, and ski area facilities) were also factored into the analysis. The economic effects of projected skier-days utilized trip expenditure data from a variety of studies (RRC Associates, 1998 and 1999). The results are separately identified in the Communities/Economic section of Chapter 3, with more detail available in Appendix B.

T90 Public Concern: The Forest Service should fully evaluate the economic consequences of reduced trail miles and associated mountain bike use.

Response: In response to public comment, impacts to and from mountain biking were given additional consideration in the FEIS. Recreation use estimates for mountain biking were separately identified and analyzed. This information is located in the Recreation Management section of Chapter 3. Additional detail is provided in Appendix B. Local economic impacts of mountain biking were also separated from general dispersed, non-motorized recreation use. Inquiries to the International Mountain Biking Association confirmed that studies providing trip expenditure patterns for mountain bikers are still rare. The best available study (Sumathi, 1997) was used to estimate local economic effects on jobs and labor income in the entire 6-county area and three sub-areas. Analysis for the larger planning area shows that approximately 90 jobs are attributable to mountain biking on the White River National Forest in 1999, growing to 110 in 2010. Only Alternative F (100 jobs) shows a moderating effect on the growth of mountain-biking-related jobs.

T91 Public Concern: The Forest Service should not promote or enhance the economic health of the region.

Response: The Forest Service has long had an interest in the condition and vibrancy of local economies, especially as they relate to the use of public lands. This is based upon both the agency's Congressionally mandated interests in healthy communities generally as well as its local concern as a partner with vested interests in the life of particular communities. Well-managed public lands and vibrant local communities are not mutually exclusive. The Communities section of the FEIS explored the implications of various land management alternatives upon local communities. The purpose of these analyses was to not promote economic development at the cost of a healthy forest, but to disclose the inevitable trade-offs that come with differing courses of action. Some alternatives enhance some social and economic aspects of local communities; some alternatives are neutral. Various parties may view the effects differently.

T92 Public Concern: The Forest Service should adopt Alternative I for its benefits to the economy.

Response: The degree to which the planning area is dependent upon the White River National Forest is analyzed and discussed in the Communities/Economics section of Chapter 3. The analysis includes both quantified estimates of jobs, income, tourism, population, and housing, as well as general observations regarding the contribution of the Forest to the attractiveness of the area. Conserving wildlands can be accomplished in a variety a ways to serve a variety of purposes, including economic considerations. The alternatives in this FEIS offer a wide range of possibilities to conserving wildlands.

T93 Public Concern: The White River Forest Plan should avoid adverse economic impacts to businesses.

Response: The economic analysis in the FEIS is designed to examine effects at the county or multi-county scale. In response to public comments, the economic analysis has been expanded from the DEIS to look at three subareas within White River planning area. Results of the analyses are in the Communities/Economics section of Chapter 3.

There are several reasons why no analysis of individual firms is found in this or other NEPA documents. First, there are thousands of tourism-related businesses in the planning area, so an analysis of impacts upon each business would be impossible. Second, impacts on individual firms would require access to data that is typically confidential and proprietary. Third, NEPA does not require an analysis of effects upon individual firms. We understand that some firms may be affected positively and other affected negatively by Forest Service programmatic and project decisions, and that such impacts sometimes affect individuals in profound ways. However, our analyses are focused at the community or higher levels.

T94 Public Concern: The Forest Service should analyze the limits imposed on local recreation-based economies caused by restricting recreational access.

Response: Projected recreation use under Alternative B ("no action") and under alternatives that might limit or constrain projected use was examined. The economic consequences of reduced recreation use have been incorporated into the effects display and discussion of the Communities/Economics section of Chapter 3. The results indicate that in 2010, jobs attributable to recreation other than downhill skiing for all alternatives

will increase from 1999 levels. Some alternatives may prompt a slower growth rate (D, F, I, and K) that would still increase recreation-related jobs by at least 15 percent. Other alternatives (B, C, and E) would not affect the growth of recreation-related jobs – projected to be about 18 percent. In the context of overall growth anticipated by the State of Colorado for the planning area, jobs growth related to White River National Forest recreation (non-skiing) accounts for about one percent of total job growth.

T95 Public Concern: The Final EIS should itemize economic impacts by recreational activities.

Response: The economic impacts in the FEIS are summarized to provide the general reader with an understanding of alternative consequences. Many readers desire greater depth of the analysis process and results. Appendix B provides another level of detail regarding the process. Still more detail can be found in the Social and Economic Specialist Report and in referenced electronic files within the administrative record. Recreation activities were grouped as follows: downhill skiing, winter non-motorized dispersed recreation, winter motorized recreation (snowmobiling), recreation in developed sites, non-motorized dispersed recreation (summer and fall, excluding mountain biking), motorized dispersed recreation (summer and fall), mechanized dispersed recreation (mountain biking), big game hunting, small game hunting, fishing, and viewing wildlife. All groups are mutually exclusive. Detailed economic impact results can be provided upon request.

T96 Public Concern: The Final EIS' regional effects analysis should include impacts to Park County.

Response: The robust tourism-based economy of the White River National Forest area causes social and economic impacts to extend beyond communities near or adjacent to the Forest. As you know, communities such as Leadville, Fairplay, Alma, and Kremmling all experience these effects. The economic modeling was done on a county basis because the benchmark data from the State of Colorado was available at the county level, not the community level. Inclusion of a county in the modeling was based on whether the county was strongly tied economically and socially to White River area. Leadville and Lake County are a good example of this. Leadville is the largest and primary population center within Lake County, having nearly half of the county population. There are other economic drivers within Lake County, but the economic and social ties to the White River area are stronger than these other drivers. Consequently, all of Lake County was included in the economic modeling. This is confirmed by the Colorado Department of Labor in its recognition of Lake, Summit, and Eagle Counties as a single labor market area. Fairplay, Alma, and Park County represent a different situation. Both the Fairplay and Alma communities combined represent only 15 percent of the population of Park County. The eastern side of Park County is strongly influenced by the Front Range. Thus, Park County was omitted from the modeling. However, each of these communities is included in the demographics analysis of Chapter 3. While these communities were not included in the economic models, they share many of the characteristics and economic ties of communities within the model area. For this reason, general conclusions of the analysis can be reasonably applied to the communities of Fairplay, Alma, and Kremmling.

T97 Public Concern: The Forest Service should control ski area permittee business practices.

Response: Any firm, including those who hold permits to operate on National Forests, must conduct business within applicable Federal, State, and local laws. This issue is beyond the scope of a Forest Plan Revision.

Section 3—Local governments

T98 Public Concern: The Forest Service should decouple the funding of counties from timber sale and other revenues.

Response: Changing legislation is outside the scope of a Forest Plan revision. However, the legislation you are referring to—the Secure Rural Schools and Community Self-Determination Act of 2000—has become law since the release of the DEIS. This law is discussed within the Communities/Local Governments section of Chapter 3.

T99 Public Concern: The Forest Service should recognize the effects of ski area expansion on private lands and on the costs to local governments for providing services and mitigating adverse impacts.

Response: The Forest Service is increasingly aware of the connections between public land management and private lands, business decisions, and local government operations. These interactions work in both directions; that is, some public land decisions affect the private sector and local governments and vice versa. Federal land management decisions do not control private land development or business decisions, but can be influential. These actions can either directly or indirectly affect the other parties. We are currently working with the Northwest Colorado Council of Governments to improve our mutual understanding of these interactions.

The analysis of community impacts in the FEIS has been revised in response to these and similar comments. A literature search was made to find research that has quantified the net costs of a tourism economy upon local governments. No studies were discovered that could be applied to the complexities of the White River situation. Estimates of additional tax revenues could have been made, and estimates of Federal payments were made in the FEIS. But examining only the revenue side of local government impacts is not helpful. The cost of additional services, including law enforcement, emergency services, street and building maintenance, social services for an expanded population and workforce, must be considered. The real story is the net effect of these costs and revenues. The FEIS discussed these effects, but quantitative estimates could not be made. Beyond recognition of potential net costs, the White River National Forest has committed to increased collaboration with local governments so that these concerns can be addressed together as the plan is implemented and the area continues to grow in the coming years.

One way in which the Forest has responded to local government concerns regarding the development of private lands near the Forest boundary is the addition of Management Area (MA) 7.1 to various alternatives. This MA, applied to National Forest lands adjacent to areas of current or potential private development, is designed to improve the cooperation between various governments for issues such as wildfire and law enforcement. See the Local Governments subsection in the Communities portion of Chapter 3 for a discussion of intermix lands.

Part 2—Communities of Interest

Section 1—Stakeholders

T100 Public Concern: The Forest Service should not manage forest resources in order to subsidize industries or protect jobs.

Response: Any policy regarding the subsidization of industries is not within the scope of the forest plan revision. While the White River National Forest is concerned with effects on jobs in communities as it relates to Forest management, it has no policy to protect jobs in selected industries.

The timber industry is often singled out as receiving favored treatment by the Forest Service. Throughout the last decade, numerous mills in the Rocky Mountain Region have closed while others have reconfigured to process smaller logs. International and national market forces now affect mills in this part of the country more directly than ever before. There is a continuing demand for timber products in this country, and National Forests play an important role in supplying timber to meet the demand. The White River National Forest historically has not been a large supplier of timber, but provides modest volumes of logs and wood fiber that are processed at local and regional mills in Wyoming and Colorado.

Timber from the White River National Forest is sold at market rates. Timber prices fluctuate from year to year, as influenced by market forces. Depending upon conditions, some firms purchase National Forest timber at prices above their production costs while others purchase timber below their production costs. Timber analysis in this FEIS used historic market prices, adjusted annually for projected real price increases.

While the Forest Service in general and this Forest Plan Revision in particular does not subsidize the timber industry with below-market prices, it has a keen interest in maintaining industry viability within the region. A local timber industry provides land managers and taxpayers with cost-effective options for treating vegetation to achieve 1) reduced risk of wildfires and insects and 2) improved forest health.

Section 2—Financial and Economic Efficiency

T101 Public Concern: The Forest Service should improve the economic impacts analysis of Alternative D.

T101.1 Alternative D Will Harm The Economy

T101.2 Limiting Ski Area Expansion Will Harm The Economy

T101.3 Alternative D Will Benefit The Economy

Response: The economic impact analysis has been completely revised for the FEIS. Using the best available data and studies by industry experts, recreation and skier use estimates have been improved, economic models have been revised and localized, and projections of growth have been updated. It is anticipated that no alternative will reduce employment and income from current levels. The differences between alternatives are best expressed as to their impact on growth. Alternative B is neutral with regard to future growth, while the others offer a range of slightly slower growth. The greatest effect on employment will still result in the addition of over 1,200 jobs attributable to activities on the White River National Forest by 2010 (Alternative I). Alternative D shows an increase

of 1,400 jobs and Alternative K, the selected alternative, shows an increase of 1,700 jobs. Ninety-eight percent of these new jobs are associated with some form of recreation. But these new jobs are a small fraction of the 52,000 new jobs in the planning area by 2010 that are projected by the State of Colorado. Under all alternatives, tourism and second home development will remain the most dominant part of planning area economy. One conclusion that can be drawn from the analysis is that population, recreation, and economic growth will happen regardless of the forest plan alternative.

T102 Public Concern: The Forest Service should use a broader array of modeling tools to improve the accuracy of the socio-economic analysis.

Response: Input/output models, such as those developed with the use of IMPLAN, have been used by the economics profession for decades to understand and analyze the linkages of an economy. The models provide a framework that expands upon more simplistic "base-export" analysis, allowing better identification of sectors and institutions and their roles within the economic area. A well-designed input/output model built with credible data provides excellent estimates of output, employment, and other economic multipliers. These multipliers include direct, indirect, and induced effects. Alternate terminology was used in the FEIS Chapter 3, Topic 7, Part 3—*Communities of Place*, referring to these three effects as "base," "indirect," and "resident services." The indirect and induced effects are sometimes referred to as "secondary." These benefits make input/output models an ideal tool for analyzing a strong tourism (export) economy, such as that found in the White River area.

An "engine" of an economy is one that brings outside dollars into the area. This "engine" can be mining, manufacturing, or tourism. Tourism is the primary engine of the economy surrounding the White River planning area. Tourism includes not only traditional tourists, who come for short stays and then return home, but second-home owners, who come repeatedly, often stay longer, and spend money on a greater variety of goods and services. Both kinds of tourists are non-residents who spend dollars that have been earned outside the area. For this reason, only non-resident spending is counted as the origin of many economic effects. The multiplier effect of tourism includes 1) jobs that sell goods and services directly to tourists, 2) jobs that sell goods and services to those businesses that deal directly with tourists, and 3) jobs that sell goods and services to all the employees (and their dependents) that received income from categories 1) and 2).

The expenditure data used for non-local skiers were derived from studies of Colorado and other Western ski areas (RRC Associates, 1998 and 1999). Day skiers were separated from destination (overnight) skiers because they have markedly different expenditure patterns. The data were converted to an average skier-day basis, and included all local trip-related expenditures. Accommodations are typically the largest component of ski expenditures and skiers typically share accommodations. For example, the cost of a condominium for a trip of five nights is split among all those in the party who ski, and then further divided by the average number of days skied per person during the trip. Consultation with ski industry experts and crosschecking with county-based tourism data confirmed that the impacts of skiing in this FEIS are reasonable estimates.

Real estate sales, whether to skiers or other tourists, were not analyzed in the FEIS.

T103 Public Concern: The Forest Service should base its economic analysis on actual case studies rather than modeling. – MOVED INTO T101.

T104 Public Concern: The Final EIS should include a detailed discussion of the methodology used to determine economic impacts.

Response: The economic analysis section of Appendix B was mistakenly omitted from the DEIS. It is included in the Appendix B of the FEIS. This section is designed for readers who desire more details of the analysis process, but it does not include sufficient information to replicate the analysis. For that level of detail, the Social and Economic Specialist Report and associated electronic files in the administrative record should be consulted. They are available upon request.

T105 Public Concern: The Forest Service should take a national accounting approach when evaluating economic impacts of alternatives.

Response: We agree that both accounting stances must be presented. Both the DEIS and FEIS include economic analyses from a regional and a national accounting stance. The regional accounting stance is used for social and economic impact analyses to local communities and counties. This includes changes to employment, labor income, housing, Federal payments to local governments, and minority populations. The national accounting stance is used for the consideration of benefits and costs to all of society. The economic cost-efficiency analysis includes market prices for timber and range outputs, and non-market price estimates for outdoor recreation. Water yield is not included in the economic analysis because estimated changes in yield stemming from vegetative treatments have not been proven to be statistically discernable at the programmatic level (Brown, et al, 1998). Many outcomes and/or ecosystem conditions associated with each alternative are not included in the economic efficiency analysis. Prices for many of these outcomes and conditions have been estimated in the economic literature, but their portability or transferability to other locations and situations is very limited. The USDA and Washington Office of the Forest Service have not established the monetary prices of non-use outcomes or conditions for application to Forest planning. The agency's cost of achieving these outcomes and conditions is included in the economic efficiency analysis. Both the impact and efficiency analyses can be found in the Communities section of Chapter 3.

T106 Public Concern: The Forest Service should modify the assumptions and constraints used in the IMPLAN model.

Response: Input/output models, such as those developed with the use of IMPLAN, have been used by the economics profession for decades to understand and analyze the linkages of an economy. The models provide a framework that expands upon more simplistic base-export analysis, allowing better identification of sectors and institutions and their roles within the economic area. A well-designed input/output model built with credible data provides excellent estimates of output, employment, and other economic multipliers. These benefits make input/output models an ideal tool for analyzing a strong tourism (export) economy, such as that found in the White River area.

The models were built with national structural relationships provided by IMPLAN, but calibrated to county-specific data. These data have been mutually agreed upon by county officials and the Demography Section of the Colorado Department of Local Affairs.

These data crossed all sectors and were especially valuable where self-employed businesses are prominent – such as the retail trade and service sectors that are so important to tourism. Fortunately, data such as these are available by county throughout Colorado, making IMPLAN models more accurate and useful than would otherwise be the case. A further benefit of these data is that IMPLAN models can be successfully applied to smaller areas. Public comment on the DEIS made it clear that analysis of the White River area must be done at both the larger planning area and at smaller sub-areas. While one must be careful to not extend the models to inappropriate levels, the robust economies of the White River area are not like typical rural counties in the Western US where such applications could not be supported.

Use of the economic models, as in most impact analyses using input/output models, was not done with pre-assigned designations of whether certain sectors were classified as "basic." The beauty of these models is that the model itself, if accurately reflecting the regional economy, can point the analyst to the portion of each sector that is "basic." The results of such an analysis is found in the Communities section and Economic subsection of the FEIS.

IMPLAN models were not used in isolation from other data sources or trends. The tourism work being directed by a partnership of the Colorado Department of Local Affairs/Demography Section, Bureau of Land Management, Colorado Tourism Office, and USDA Forest Service (Center for Business and Economic Forecasting, Inc, 2001b) provided important economic information that was used to further calibrate recreation impact estimates. In addition, independent employment projections provided by the Colorado Department of Local Affairs/Demography Section (Center for Business and Economic Forecasting, Inc, 2001a) put the modeling impact results into a reliable long-term context. Yes, input/output models are static models that have limitations, but when used in conjunction with other analytical data they can provide credible and valuable insights in the economy of an area.

Further details of the social and economic modeling and analysis can be found in the Social and Economic Specialist Report contained within the administrative record.

T107 Public Concern: The Forest Service should expand the economic analysis to include a broader array of costs and benefits.

T107.1 Non-priced Values – e.g. tangible and intangible; existence, option and bequest;

Response: There are many values associated with National Forests that cannot be expressed in monetary terms. Many values are highly personal and subjective in nature. These values include connections of people, circumstances, time and place that occur on the National Forests. An example may be an annual family trip to a certain scenic vista using their off-highway vehicle on a favorite designated route. Monetary expressions are poor measures for the moment and the reflection of such multi-faceted values. These, however, may be the greatest value of National Forests to the nation.

Other values can and have been expressed in monetary terms in the economics literature. Existence, option, and bequest values are among the kinds of values that have been expressed in monetary terms. Typically, a study is focused on a particular kind of value for a particular geographic location and a particular population. The results are valid for that specific location and population, but may not be transferable to all situations. Thus, a

study in the northern Rockies or Columbia River Basin may not be applicable to the White River National Forest.

The economics literature clearly shows that people hold passive use values for a variety of conditions on the National Forests. These values are relevant to the management situation on the White River, but the spectrum of values in the literature is not easily transferred to the programmatic analyses and decisions being made for the White River. Although the Forest Service recognizes the validity and importance of these values, the existing literature is not sufficient to serve as a basis for monetary estimates of the management actions proposed by the White River plan. Therefore, passive use values for such things as biological diversity and wildlife habitat must be taken into consideration in a qualitative sense.

Comments on the DEIS have suggested that the full value of the White River National Forest should be included in any benefit-cost analysis. This value might include such things as ecosystem services, its place in our national heritage, and all capital improvements. This kind of analysis would be appropriate if the decision in a forest plan revision was to retain or eliminate the entire National Forest. The decisions made in a forest plan revision, however, are incremental. The decisions are not whether to keep or sell the White River National Forest, but rather to make step-wise changes in the way it is managed. Consequently, it is the difference between the "no action" alternative (B) and the other alternatives that offers insight into the benefits and costs of each course of action.

The values mentioned above are often discussed in the biological, physical, recreational, or cultural sections of the FEIS. Their consideration is also documented in the Record of Decision. Because such values are not expressed in monetary terms and therefore not included in the economic efficiency analysis does not mean that they have been excluded from the calculus of "net public benefits". Present net value is determined in part from benefits that can be expressed monetarily, but this is only a portion of all the values associated with the White River National Forest.

T107.2 Off-site Impacts – MOVED TO T84

T107.3 Externalities

Response: 36 CFR 219.12(g)3(i) directs that costs "of the agency and all other public and private costs required to manage the forest up to the point where the outputs are valued and the environmental consequences are realized" be included in the estimated effects of alternatives (emphasis added). Agency costs have been included in Chapter 3, Topic 7, Part 2, Section 2— *Financial and Economic Efficiency*. Where there are significant private costs necessary to provide the valued outputs, they have been estimated and explicitly included in the efficiency analysis. These include the costs of doing business on the Forest incurred by permitees. There are no other public costs that we are aware of associated with the valued outputs of timber, range, and recreation.

Local or regional effects to communities (jobs and income) and governments (Federal payments) have been estimated and discussed in the Communities section of Chapter 3. Effects on individual businesses are not required by NEPA nor by NFMA. Effects associated with municipal watersheds and urban interface areas are discussed in their respective sections.

T107.4 Opportunity Costs

Response: The notion of opportunity cost has been strengthened in the economic and financial efficiency subsections of Chapter 3. A summary of biological, physical, social, and economic differences among alternatives, including present net value, is included in Chapter 2. A discussion of these differences or trade-offs among alternatives as they relate to a decision is found in the Record of Decision. There is no analysis of project-level investments since this decision is forest-wide in nature.

T107.5 Roads and Road Closures

Response: Site-specific road and trail direction is not part of the forest plan. Forest-wide standard and guidelines are used to guide programmatic travel management decisions on all National Forest System lands within the White River National Forest. Management area prescriptions contain additional standards and guidelines that further dictate travel management. The resource emphasis of each management area prescription influences the type of travel management for each area. Travel management rules and strategies will be developed within a travel management plan, which will comply with the standards and guidelines in the revised forest plan. A draft travel management plan will be issued with the release of the final forest plan. Once the travel management plan is finalized, site-specific projects will be developed. During development of the project plans, detailed benefits and costs must be considered.

The cost of road construction, closure, maintenance, and restoration are fully included in the total budget of each Forest Plan revision alternative. The cost of each alternative was fixed at two budget levels: experienced and full. Costs were allocated among program areas for each alternative, but finer details were not estimated. The speed with which roads may be constructed, closed, maintained, or restored is an implementation issue and will be dependent upon available funding. However, each road activity must be compliant with the standards and guides in the forest plan and consistent with the travel management plan.

T107.6 Noxious Weed Control

Response: The environmental consequences of noxious weeds are better established than the economic consequences. A literature search for studies estimating the economic effects of noxious weeds in Colorado or the Rocky Mountains yielded nothing. Anecdotal evidence appears to be all that is currently available. Statements regarding economic consequences of noxious weed control have been removed from the FEIS.

T107.7 Predator Control

Response: Predator control was not a revision topic. There is no management change that would prompt this type of analysis. Other issues related to predator control are beyond the scope of this Forest Plan Revision.

T107.8 Timber Harvest

Response: Historic TSPIRS information is provided for context only. It is not used to "justify" or to analyze the economic consequences of alternative programmatic timber activities.

The FEIS includes a broad array of timber program alternatives, ranging from annual harvest levels of 5.4 to 22.3 MMBF of sawtimber in the first decade. The economic and environmental consequences, including costs, of this broad range are included in the "Direct and indirect effects" portion of each section in Chapter 3 of the FEIS. The social

and economic analyses examine the total consequences of each alternative. Timber management, because it is such a small portion of the total consequences, is not isolated in the Communities section. However, the present net value (PNV) analysis of the timber program is displayed in the Timber Management section. Further details are available in Appendix B.

T107.9 Soil Expectation Value

Response: Management of the White River National Forest is not guided solely by a PNV analysis. The guiding concept in Forest Planning is Net Public Benefits. This concept is well defined in the regulations that direct the planning process:

"An expression used to signify the overall long-term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs) whether they can be quantitatively valued or not. Net public benefits are measured by both quantitative and qualitative criteria rather than a single measure or index." (CFR 219.3)

Soil expectation value (SEV) is a theoretical concept that is well known in forest economics and by those who designed the planning regulations. Forest planning is concerned with taking the current condition of a National Forest, devising a variety of management alternatives to achieve specified desired conditions, then examining the effects of those alternatives. Programmatic timber activities are analyzed over long periods of time to assure that requirements such as non-declining sustained yield can be achieved within the desired conditions. SEV is a more narrow concept that could be calculated, but it does not address the more comprehensive objectives of forest planning. For this reason, SEV is not required by the planning regulations.

T107.10 Fish and Wildlife

Response: The local economic impacts of habitat management are included within the total economic impacts provided in Chapter 3. Impacts only occur when an economic activity happens. The economic activities associated with fish and wildlife management alternatives in this FEIS are local expenditures by the Forest Service for management activities and local expenditures by non-residents for hunting, fishing, or viewing wildlife. Both of these activities bring outside dollars into the planning area. The consequences of each are tabulated and discussed in the Communities/Economics section of Chapter 3.

T107.11 Carbon Storage

Response: The issue of carbon sequestration was neither a revision topic nor a prominent analytical topic that resulted from scoping. Consequently, it was not included in the alternative design or effects analysis in this FEIS.

T108 Public Concern: The Forest Service should expand the economic analysis to include a broader array of costs and benefits.

T108.1 Watershed Protection

T108.2 Soil Fertility

T108.3 Non-game Fish and Wildlife –MOVED TO T107.10

T108.4 Scenic Quality – MOVED TO T85

T108.5 Existence, Option, and Bequest Values – MOVED TO T107.1

T108.6 Research Benefits

Response: The economic analysis addressed an appropriate range of costs and benefits for planning at the broad, forest-wide scale. At this scale it is not appropriate to estimate quantitative adverse impacts to water quality and soil productivity. The intent of the forest plan is to minimize, mitigate, or eliminate impacts to such resources. Likewise it is not appropriate to attempt to place monetary values on such potential impacts. The cost of mitigation measures is better analyzed at the project level, when more accurate estimates of impacts and mitigation can be determined. Similarly, the economic benefit of future research benefits cannot be valued economically at this time, in this analysis.

T108.7 Net Social Capital

Response: The alternatives in this FEIS provide a wide range of forest management options. However, none of them fundamentally or significantly change the anticipated future of communities in the area. As shown and discussed in Chapter 3, Alternatives D and I indicate opportunities to very modestly slow, but not significantly alter the rapid growth projected for the area. All of the remaining alternatives have little or no effect on community indicators. These effects suggest that important community variables such as leadership opportunities, education, and self-identity will not be affected.

T108.8 Tangible and Intangible Values –MOVED TO T107.1

T109 Public Concern: In the Final EIS, the Forest Service should use quantitative ecosystem indicators to evaluate benefits to the public.

Response: Between the close of public comments on the DEIS and completion of the FEIS, meetings were held with stakeholders of the White River National Forest. In those meetings, stakeholders were asked to verify and edit a list of objectives that they held for management of the White River National Forest. They were then asked to identify the attributes or measures that best represented those objectives. Included among the stakeholders were motorized recreationists, non-motorized recreationists, government interests, skiing interests, environmental/conservation interests, and second-home owners. The results of this work include tables that compare alternatives using the objectives/attributes of the stakeholders. Ecosystem indicators are among the attributes identified by several stakeholders of the White River National Forest. Details of this work, the results, and the research behind this approach can be found in the Communities/Stakeholders section of Chapter 3 and in Appendix B.

T110 Public Concern: The Final EIS should include a summary table of anticipated non-priced outputs by alternative.

Response: Summary tables of anticipated, measurable outcomes and activities by alternative can be found in Supplemental Table 2, Chapter 2. Detailed discussions of each outcome can be found in the corresponding sections of Chapter 3. A balancing of all economic and non-economic outputs is best found in the Record of Decision. In that document, the Regional Forester must disclose his consideration of outputs and outcomes that are monetarily valued (in the economic efficiency analysis) with others that do not have or cannot be monetarily valued. Community impacts are also discussed within the Record of Decision. This consideration of all priced and non-priced consequences is the central notion of Net Public Benefit.

T111 Public Concern: The Forest Service should measure the economic effects of alternatives relatives to what would happen over time without their implementation.

Response: We agree that an economic analysis should consider the effects of alternatives over the planning horizon. This was done in the DEIS, but the tables may not have made it clear. In the FEIS, this comparison of alternatives with a baseline is made in the cumulative effects section of the Communities/Economics analysis. Alternative B, the "no action" alternative is considered to be implicitly included within the individual, business, and governmental decisions that shape projections of employment and income made by the State of Colorado. Other alternatives are displayed as either increasing or decreasing employment and labor income from the Alternative B baseline. In the same table, comparisons are also made to conditions in 1999. A careful study of these tables and the accompanying text will show that most alternatives either slow projected growth of the area or have no effect upon projected growth.

TOPIC 8
AMERICAN INDIAN RIGHTS AND INTERESTS

T112 Concerns for this Topic Are Addressed in Affected Environment Topic Areas

TOPIC 9
OTHER CONSIDERATIONS

T113 Concerns for this Topic Are Addressed in Affected Environment Topic Areas

DEIS APPENDICES

APPENDIX B
DESCRIPTION OF THE ANALYSIS PROCESS

T114 Public Concern: The Forest Service should modify assumptions used in timber modeling.

Response: We did our best to present the process of determining ASQ in a logical manner. The overall process is presented in FEIS, Figure B-1 of Appendix B, Timber Analysis Section; page B-4. This figure identifies the individual components that are combined to do the analysis. The remainder of Appendix B, Section Timber Analysis; addresses each of the components individually, providing some but not all details. There are practical limits as to how much detail can be included in the published Forest Plan Documents. Additional detail can be found in the *Supplement to Appendix B* referred to on page B-8. This supplement is not included in the 2002 Forest Plan and FEIS CD or published documents, but was available for review upon request and is included on the administrative record CD. Even more minute details could be obtained by examining the supporting materials in the administrative record.

T114.1 Wet Soils

Response: Under certain conditions wet soils can be harvested without irreversible damage (as described in Appendix B page B-19) and can be regenerated, so these lands are included in the suitable base used to estimate ASQ. The watershed conservation practices handbook, which is part of the 2002 Forest Plan standards and guidelines package, addresses wet areas. During project planning, site-specific evaluation is conducted and specified protection and mitigation requirements for specific wet areas determined.

T114.2 Flow Constraints (steep slopes)

Response: The percentage of lands suited for timber management greater than 40 percent slope is small in all alternatives (Figure fw16_strata.xls on page A1 of the Supplement to Appendix B that is available at the Forest Supervisor's Office). The Watershed Conservation Practices Handbook (2509.25), which is part of the forest plan standards and guidelines package, address timber harvest on steep slopes. During project planning, site-specific evaluation is conducted and specific protection requirements for harvest areas determined. As with all areas within a project, steep slopes would be included in specific harvest plans only if:

- Such lands were part of the suitable timber base slated for active management
- Irreversible damage would not result
- Regeneration could be achieved
- Treatment is compatible with ecosystem management objectives as applied to the project area.

In terms of having a long term, balanced and economically viable timber program, the agency must tackle some of the more difficult and expensive actively managed suitable lands throughout the planning horizon, without deferring that management until later

decades to avoid economic problems in those planning horizons. These lands must either be harvested throughout the planning horizon, or not included in the suitable land base, hence the flow constraints mentioned in Appendix B.

T115 Public Concern: The Forest Service should complete the required analysis of relative resource values and externalized costs in the timber suitability determination.

Response: The analysis of timber suitability can be found in Appendix B of the FEIS under Lands Suited for Timber Production. The analysis used five standards to determine whether a particular parcel might be suitable for timber production. These five standards incorporated and complied with the following required direction: 36 CFR 219.9(a)(1) [1], 36 CFR 219.14(a)(4) [1], FHS 2409.13-21.3 [2], 36 CFR 219.14(a)(21) [1], and 36 CFR 219.14(a)(3) [1]. Quantifying related resource values, ecosystem service values and externalized logging cost are difficult if not impossible, give that these values are subjective and "value laden". The White River National Forest is unaware of any acceptable procedure to quantify these values. These values are discussed qualatatively in the FEIS, Chapter 3, Social and Economic Setting.

APPENDIX D
HISTORIC RANGE OF VARIABILITY

T116 Public Concern: The Forest Service should revise the Historic Range of Variability Analysis to reflect current scientific knowledge.

T116.1 Fire Return Intervals

T116.2 Patch Size

T116.3 Maturity of Forest Stands

Response: The Historic Range of Variability (HRV) assessment was updated for the FEIS. This update incorporates comments received after review of the original document by a scientific panel made up of academic specialists that are currently involved in documenting HRV conditions throughout Region 2 of the Forest Service. As their final reports become available, they will be reviewed by Forest specialists, and pertinent information will be incorporated into the Revised White River Forest Plan as appropriate. The updated White River National Forest HRV document incorporates the comments from the review by the scientific panel and focuses on historic disturbance regimes and landscape patterns that resulted from these disturbances. These landscape patterns are compared with current disturbance regimes and patterns. Ecological implications of these differences are identified and documented in the FEIS in Chapter 3, Topic 1, Part 2, Section 1 and Appendix D.. Desired conditions for various ecological attributes are linked in the Plan to the information contained in the HRV section where possible.

This update for the FEIS was an interdisciplinary process and involved a review and incorporation of comments from the scientific review panel by specialists from the Forest and the R2 Regional Office. The primary results of this update are found in the Biodiversity Section of the FEIS. The entire HRV document is found as Appendix D to the FEIS.

T117 Public Concern: The Forest Service should expand the Historic Range of Variability Analysis.

T117.1 Include All Salvage Logging Impacts

T117.2 Include A Discussion Of Roads And High-Contrast Edge Effects

Response: See the response to T116.

T118 Public Concern: The Forest Service should disclose the analysis used to determine changes in patch size.

Response: See the Response to T116. Patch size analysis was completed through the use of information included in the Rocky Mountain Resource Information System and the Common Vegetation Unit of the Forest Vegetation databases and through the use of the FRAGSTATS landscape analysis computer model.

T119 Public Concern: The Forest Service should quantitatively define Desired Future Conditions to supplement general HRV discussions.

Response: See the Response to T116. See the Response to T120. Additionally, the Forest did not quantify desired future condition in the FEIS and Revised Forest Plan. We did however provide HRV desired conditions for each management area category in the Revised Forest Plan (see introduction sections to each category of management area in Chapter 3 of the Revised Plan). The HRV discussions in the FEIS in Chapter 3, Topic 1, Part 2, Section 1, and Appendix D provide Forest managers with the basic information necessary to design projects within the sideboards or baselines to maintain healthy ecosystems.

T120 Public Concern: The Forest Service should rewrite the Historic Range of Variability Analysis and subject it to peer review.

Response: See the Response to T116. The Forest has incorporated the results of one scientific peer review of the HRV document and will continue to incorporate new information as it becomes available.

T121 Public Concern: The Historic Range of Variability Analysis report should include citations and a complete bibliography.

Response: The HRV assessment is included as appendix D of the FEIS. Many of the references used in this assessment are included as citations in this document. The full list of all literature cited and references used in the Historic Range of Variability assessment are a portion of each specialist report and are included in the public record for the FEIS. They are available at the Forest Supervisor's office in Glenwood Springs, CO.

T122 Public Concern: The Forest Service should clarify how the proposed Forest-wide Biodiversity Standard #2 would apply within the 8.25 management area prescription.

Response: Biodiversity Standard #2 is a forest-wide standard and will be applied within management area 8.25 in the same manner it is applied throughout the remainder of the Forest. The commenter expressed concern that the retention of snags and downed woody material would be a safety hazard on developed ski runs. This standard applies to forested stands Forest-wide, including within 8.25 ski areas; it does not apply to non-forested areas such as developed ski runs or natural grassland meadows. Additionally, the note following Table 2-1 in the 2002 Forest Plan provides for adequate flexibility to allow

managers to take site-specific conditions, including safety, into account while planning for the retention of snags and downed woody materials.

Chapter 4
Respondents and Scanned Governmental Response Letters

List of Respondents to the Draft Forest Plan and DEIS by Affiliation

The table below displays the self-identified government agencies, elected officials, and interest group and business representatives who submitted comments on the draft forest plan and draft environmental impact statement (DEIS) during the formal comment period. The table is organized by affiliation type. Each respondent's name is then listed alphabetically within each group. The unique identifying number that we assigned to each response letter for tracking purposes is also listed here. Many respondents submitted multiple different letters, in which case all letter numbers are listed. Any exact duplicate letters from the same respondent(s) that we received by different delivery methods (both fax and e-mail, for example) only appear under one letter number. Due to the great volume of response letters, totaling nearly 14,000, we were not able to list the individuals who commented on the draft planning documents in this table. This information is on file at the Supervisor's Office in Glenwood Springs.

The section that follows this table includes an electronically scanned reproduction of the response letters submitted by government agencies and officials. Due to the voluminous response we received during the comment period, these letters are positioned two per page and may be somewhat difficult to read. All original letters are on file at the Supervisor's Office in Glenwood Springs if you would like to review them directly. The Content Analysis Team also entered the verbatim text of all coded comments into a custom searchable database. For more information, contact the planning staff at the Supervisor's Office.

Table A-2
List of respondents to the draft forest plan and DEIS by organizational affiliation

AGENCY, ELECTED OFFICE, ORGANIZATION, OR BUSINESS NAME	CITY	STATE	LETTER NUMBER
FEDERAL ELECTED OFFICIAL OR AGENCY (also multi-jurisdictional)			
BUREAU OF LAND MANAGEMENT	GLENWOOD SPRINGS	CO	4470
DEPARTMENT OF THE ARMY/CORPS OF ENGINEERS	GRAND JUNCTION	CO	11890
DEPARTMENT OF ENERGY	LAKEWOOD	CO	12213
DILLON RESERVOIR RECREATION COMMITTEE	BRECKENRIDGE	CO	2310
U.S. ARMY/DEPT NATURAL RESOURCES	DENVER	CO	14368
U.S. CONGRESS – DISTRICT 1, REP. DEGETTE	WASHINGTON	DC	3555
U.S. CONGRESS – DISTRICT 3, REP. MCINNIS	WASHINGTON	DC	287
U.S. CONGRESS – DISTRICT 3, REP. MCINNIS	WASHINGTON	DC	11990
U.S. CONGRESS – REPS. HEFLEY, SCHAFFER, TANCREDO	WASHINGTON	DC	13993
U.S. ENVIRONMENTAL PROTECTION AGENCY/ REGION 8/ECOSYSTEMS PROTECTION PROGRAM	DENVER	CO	12236
U.S.DEPARTMENT OF THE INTERIOR/OFFICE OF THE SECRETARY/ENVIRONMENTAL POLICY	DENVER	CO	10903

STATE ELECTED OFFICIAL OR AGENCY			
COLORADO DIVISION OF WILDLIFE & NATURAL RESOURCES	DENVER	CO	14369
COLORADO DIVISION OF WILDLIFE & NATURAL RESOURCES	DENVER	CO	14371
COLORADO DIVISION OF WILDLIFE & NATURAL RESOURCES	DENVER	CO	14372
COLORADO DIVISION OF WILDLIFE & NATURAL RESOURCES	DENVER	CO	14370
COLORADO DIVISION OF WILDLIFE & NATURAL RESOURCES S	DENVER	CO	14373
COLORADO INTERMOUNTAIN FIXED GUIDEWAY AUTHORITY	DUMONT	CO	6907
STATE OF COLORADO, ATTORNEY GENERAL	DENVER	CO	12243
STATE OF COLORADO GENERAL ASSEMBLY (Senators Dennis, Hernandez, Dyer, Hillman, Wattenberg, Choulber; Reps. Johnson, Larson, Young, Miller, Taylor, Alexander, Spradley, Smith, and Tochtrop)	DENVER	CO	3077
STATE OF COLORADO GENERAL ASSEMBLY (Senators Dennis, Hernandez, Dyer, Hillman, Wattenberg, Choulber; Reps. Johnson, Young, Miller, Taylor, Alexander, Spradley, Smith, Webster, Coleman, and Hoppe)	DENVER	CO	3198
STATE OF COLORADO/ DEPARTMENT OF NATURAL RESOURCES	DENVER	CO	446
STATE OF COLORADO/ DEPARTMENT OF NATURAL RESOURCES	DENVER	CO	2311
STATE OF COLORADO/ DEPARTMENT OF PUBLIC HEALTH AND THE ENVIRONMENT WATER QUALITY CONTROL DIVISION	DENVER	CO	12217
COUNTY ELECTED OFFICIAL OR AGENCY			
ASSOCIATED GOVERNMENTS OF NW COLORADO	RIFLE	CO	8154
DELTA COUNTY BOARD OF COMMISSIONERS	DELTA	CO	13342
EAGLE COUNTY BOARD OF COMMISSIONERS	EAGLE	CO	252
EAGLE COUNTY BOARD OF COMMISSIONERS	EAGLE	CO	14350
EAGLE COUNTY COMMISSIONERS	EAGLE	CO	3343
EAGLE COUNTY CORP.	EAGLE	CO	14348
EAGLE COUNTY MIDVALLEY TRAIL COMMITTEE	BASALT	CO	11335
EAGLE COUNTY REGIONAL TRAIL SYSTEM	AVON	CO	14386
EAGLE COUNTY REGIONAL TRAIL SYSTEM	AVON	CO	11916
EAGLE COUNTY RF PLANNING COMMISSION	EAGLE	CO	12825
GARFIELD COUNTY BOARD OF COMMISSIONERS	GLENWOOD SPRINGS	CO	1
GARFIELD COUNTY BOARD OF COMMISSIONERS	GLENWOOD SPRINGS	CO	4135
GRAND COUNTY BOARD OF COMMISSIONERS	HOT SULPHUR SPRINGS	CO	8264
GUNNISON COUNTY COMMISSIONERS	GUNNISON	CO	3634
JACKSON COUNTY BOARD OF COMMISSIONERS	WALDEN	CO	6378
JACKSON COUNTY BOARD OF COMMISSIONERS	WALDEN	CO	12122
MESA COUNTY BOARD OF COMMISSIONERS	GRAND JUNCTION	CO	6001
NW COLORADO COUNCIL OF GOVERNMENTS	SILVERTHORNE	CO	3432
NW COLORADO COUNCIL OF GOVERNMENTS	SILVERTHORNE	CO	2701
NW COLORADO COUNCIL OF GOVERNMENTS/ WATER QUALITY/QUANTITY COMMITTEE	SILVERTHORNE	CO	4137
PITKIN COUNTY BOARD OF COMMISSIONERS	ASPEN	CO	201
PITKIN COUNTY BOARD OF COMMISSIONERS	ASPEN	CO	1600
PITKIN COUNTY BOARD OF COMMISSIONERS	ASPEN	CO	10582

COUNTY ELECTED OFFICIAL OR AGENCY, continued			
RURAL RESORT REGION	GRAND JUNCTION	CO	510
SAN JUAN COUNTY	SILVERTON	CO	1527
SUMMIT COUNTY BOARD OF COMMISSIONERS	BRECKENRIDGE	CO	5980
SUMMIT COUNTY BOARD OF COMMISSIONERS	BRECKENRIDGE	CO	12889
SUMMIT COUNTY GOVERNMENT	BRECKENRIDGE	CO	235
SUMMIT COUNTY GOVERNMENT	BRECKENRIDGE	CO	435
SUMMIT COUNTY OPEN SPACE ADVISORY COUNCIL	FRISCO	CO	289
SUMMIT COUNTY OPEN SPACE AND TRAILS DEPARTMENT	FRISCO	CO	4702
SUMMIT COUNTY TEN MILE PLANNING COMMISSION	FRISCO	CO	4968
SUMMIT STAGE	BRECKENRIDGE	CO	286
TOWN/CITY ELECTED OFFICIAL OR AGENCY			
ASPEN CITY COUNCIL	ASPEN	CO	2529
AVON CORP.	AVON	CO	10542
BOULDER CITY	BOULDER	CO	12043
CITY OF ASPEN	ASPEN	CO	3692
CITY OF GLENWOOD SPRINGS	GLENWOOD SPRINGS	CO	3553
CITY OF RIFLE	RIFLE	CO	6676
CITY OF RIFLE	RIFLE	CO	11544
DENVER BOARD OF WATER COMMISSIONERS	DENVER	CO	4409
DILLON CORP.	DILLON	CO	8308
GUNNISON CITY CORP.	GUNNISON	CO	7661
SNOWMASS VILLAGE TOWN COUNCIL	SNOWMASS VILLAGE	CO	11580
TOWN OF BASALT	BASALT	CO	10469
TOWN OF BRECKENRIDGE, TOWN COUNCIL	BRECKENRIDGE	CO	202
TOWN OF BRECKENRIDGE, OPEN SPACE ADVISORY COMMISSION	BRECKENRIDGE	CO	204
TOWN OF BRECKENRIDGE, OPEN SPACE ADVISORY COMMISSION AND TOWN COUNCIL	BRECKENRIDGE	CO	387
TOWN OF BRECKENRIDGE, OPEN SPACE ADVISORY COMMISSION AND TOWN COUNCIL	BRECKENRIDGE	CO	4809
TOWN OF BRECKENRIDGE	BRECKENRIDGE	CO	14186
TOWN OF CRESTED BUTTE	CRESTED BUTTE	CO	4590
TOWN OF EAGLE	EAGLE	CO	10538
TOWN OF FRISCO	FRISCO	CO	288
TOWN OF FRISCO	FRISCO	CO	6169
TOWN OF FRISCO	FRISCO	CO	10815
TOWN OF FRISCO	FRISCO	CO	6119
TOWN OF MEEKER	MEEKER	CO	11609
TOWN OF MINTURN	MINTURN	CO	13375
TOWN OF MONTEZUMA	DILLON	CO	6896
TOWN OF VAIL	VAIL	CO	10468
TROUT & RALEY, PC for cities of Aurora & Colorado Springs	DENVER	CO	10824
UPPER BLUE PLANNING COMMISSION	FRISCO	CO	284
UPPER BLUE PLANNING COMMISSION	FRISCO	CO	4393
WOODY CREEK CAUCUS DISTRICT PLANNING COMMISSION	WOODY CREEK	CO	13062
BUSINESS, GENERAL			
REDSTONE GENERAL STORE	REDSTONE	CO	13064
REDSTONE INN	REDSTONE	CO	13534
TRAILHEAD	BUENA VISTA	CO	1296

CHAMBER OF COMMERCE/MERCHANT'S ASSOCIATION			
EAGLE VALLEY CHAMBER OF COMMERCE	EAGLE	CO	14523
EAGLE VALLEY CHAMBER OF COMMERCE	EAGLE	CO	2692
REDSTONE MERCHANTS ASSOCIATION	REDSTONE	CO	11750
SUMMIT COUNTY CHAMBER OF COMMERCE	FRISCO	CO	8513
VAIL VILLAGE MERCHANTS ASSOCIATION	VAIL	CO	6928
UTILITY			
CLINTON DITCH & RESERVOIR CO.	BRECKENRIDGE	CO	3684
COLORADO RIVER WATER CONSERVATION DIST.	GLENWOOD SPRINGS	CO	3095
COLORADO WATER CONGRESS	DENVER	CO	3559
DIVIDE CREEK HIGHLINE DITCH CO.	SILT	CO	10562
EAGLE PARK RESERVOIR	VAIL	CO	3214
GRAND VALLEY IRRIGATION CO.	GRAND JUNCTION	CO	11367
HOLY CROSS ENEGRY	GLENWOOD SPRINGS	CO	3086
HOLY CROSS ENERGY	GLENWOOD SPRINGS	CO	11992
MAYNES BRADFORD SHIPPS LLP	DURANGO	CO	2717
PUBLIC SERVICES OF COLORADO	DENVER	CO	1168
RUEDI WATER POWER AUTHORTIY	ASPEN	CO	11284
TROUT & RALEY for Snowmass Water & Sanitation Dept.	DENVER	CO	13419
UPPER ARKANSAS & SOUTHERN PLATTE PROJECT	DENVER	CO	11297
UPPER EAGLE REGION WATER AUTHORITY	VAIL	CO	2435
VIDLER WATER CO, INC.	BRECKENRIDGE	CO	12119
AGRICULTURE/LIVESTOCK INDUSTRY OR ASSOCIATION			
BLANCO DISTRICT PERMITTEE	MEEKER	CO	3651
COLORADO CATTLEMEN'S ASSOCIATION	ARVADA	CO	8502
COLORADO FARM BUREAU	ENGLEWOOD	CO	10873
COLORADO WOOL GROWER'S ASSOCIATION	ARVADA	CO	13307
COLORADO WOOL GROWER'S ASSOCIATION	MEEKER	CO	14394
DAVID SMITH RANCHES INC.	MEEKER	CO	12242
EAGLE COUNTY CATTLEMEN'S ASSOCIATION	GYPSUM	CO	3084
HOLY CROSS CATTLEMEN	RIFLE	CO	4764
HOLY CROSS CATTLEWOMEN	RIFLE	CO	4718
RIO COUNTY STOCKGROWERS ASSOCIATION	MEEKER	CO	12229
WESTERN DIVIDE CATTLE GROWERS ASSOCIATION	SILT	CO	11311
LOGGING OR WOOD PRODUCTS INDUSTRY			
INTERMOUNTAIN FOREST ASSOCIATION	RAPID CITY	SD	7662
INTERMOUNTAIN RESOURCES LLC	MONTROSE	CO	12227
MINING/OIL AND GAS INDUSTRY			
CLIMAX MOLYBDENUM CO.	EMPIRE	CO	8494
COLORADO MINING ASSN	DENVER	CO	10583
MID CONTINENT RESOURCE INC.	GLENWOOD SPRINGS	CO	8087
NW MINING ASSOCIATION	SPOKANE	WA	11889
SKI AREA OR ASSOCIATION			
ARAPAHOE BASIN SKI AREA	DILLON	CO	12887
ASPEN SKIING COLORADO	ASPEN	CO	2487
BEAVER CREEK RESORT	VAIL	CO	12885
BOARD OF TRUSTEES OF COLORADO SKI COUNTRY USA	DENVER	CO	8488
BOARD OF TRUSTEES OF COLORADO SKI COUNTRY USA	DENVER	CO	1687
BRECKENRIDGE SKI RESORT	BRECKENRIDGE	CO	12883
COPPER MOUTAIN RESORT	COPPER MOUNTAIN	CO	13373

SKI AREA OR ASSOCIATION			
KEYSTONE	KEYSTONE	CO	3356
KEYSTONE	KEYSTONE	CO	3590
KEYSTONE	KEYSTONE	CO	3620
KEYSTONE	KEYSTONE	CO	3763
KEYSTONE	KEYSTONE	CO	6712
KEYSTONE	KEYSTONE	CO	12207
NATIONAL SKI AREAS ASSOCIATION	LAKEWOOD	CO	12882
SKI COOPER	LEADVILLE	CO	159
SKI COOPER	LEADVILLE	CO	553
SKI COOPER	LEADVILLE	CO	10829
SUNLIGHT MOUNTAIN RESORT	GLENWOOD SPRINGS	CO	12888
VAIL RESORT	VAIL	CO	10500
VAIL RESORT	VAIL	CO	13140
VAIL RESORT	VAIL	CO	12886
VAIL RESORTS MGMT CO	VAIL	CO	13343
VAIL RESORTS MGMT CO	VAIL	CO	12884
SPECIAL USE PERMIT HOLDER/ OUTFITTER/ GUIDE, RECREATION-RELATED (NON-SKI AREA)			
10TH MOUNTAIN DIVISION	ASPEN	CO	1237
AMERICAN ADVENTURE/EXPEDITION	DENVER	CO	7521
BALCOMB & GREEN PC for Diamond M. Ranch	GLENWOOD SPRINGS	CO	14178
BALCOMB & GREEN PC for North Elk Inc.	GLENWOOD SPRINGS	CO	2393
COLORADO OUTWARD BOUND SCHOOL	LEADVILLE	CO	11218
CRYSTAL RIVER RANCH	CARBONDALE	CO	14329
DIAMOND M RANCH	MEEKER	CO	1712
DICK PENNINGTON GUIDE SERVICE LTD	GRAND JUNCTION	CO	467
LOST WONDER HUT	EVERGREEN	CO	3351
OUTWEST GUIDES	NEW CASTLE	CO	3196
PINE VALLEY RANCH TRUST	VAIL	CO	13293
SUMMIT HUTS ASSOCIATION	BRECKENRIDGE	CO	13395
TRIPLE G OUTFITTERS & GUIDES	WOLCOTT	CO	1744
PLACE-BASED ORGANIZATION			
CRYSTAL RIVER CAUCUS	REDSTONE	CO	6880
KEYSTONE CONDO ASSOCIATION INC	DILLON	CO	11899
KEYSTONE NEIGHBORHOOD COUNCIL	KEYSTONE	CO	2281
KEYSTONE NEIGHBORHOOD COUNCIL	KEYSTONE	CO	13498
KEYSTONE OWNERS ASSOCIATION	KEYSTONE	CO	10877
KEYSTONE OWNERS ASSOCIATION	KEYSTONE	CO	12289
OTHER			
GATES FAMILY FOUNDATION	DENVER	CO	1724
MOFFITT CITY DEMOCRATS	DENVER	CO	8514
GUNNISON COUNTY DEMOCRATS	GUNNISON	CO	10911
RIO BLANCO COUNTY DEMOCRATIC PARTY	MEEKER	CO	12234
ROCKY MOUNTAIN BIOLOGICAL LABORATORY	CRESTED BUTTE	CO	12224
ROUTT COUNTY DEMOCRATS	STEAMBOAT SPRINGS	CO	

NON-MOTORIZED/NON-MECHANIZED RECREATIONAL ORGANIZATION			
AMERICAN CANOE ASSOCIATION INC.	SPRINGFIELD	VA	10819
BACK COUNTRY SKIERS ALLIANCE	BOULDER	CO	236
BACK COUNTRY SKIERS ALLIANCE	ELDORADO SPRINGS	CO	3392
CLIMBING MAGAZINE	CARBONDALE	CO	12109
COLORADO MOUNTAIN CLUB	GOLDEN	CO	4457
COLORADO MOUNTAIN CLUB	GOLDEN	CO	13470
COLORADO MOUNTAIN CLUB WESTERN SLOPE GROUP	PALISADE	CO	7769
KIMBALL UNION ACADEMY	MERIDEN	NH	1695
NORDIC & BACKCOUNTRY SKIERS ALLIANCE	SUN VALLEY	ID	1577
SKI TOURING SECTION LOMA PRIETA CHAPTER, SIERRA CLUB	LIVERMORE	CA	872
THE ACCESS FUND	SALINAS	CA	12215
MECHANIZED RECREATIONAL ORGANIZATION			
ASPEN CYCLING CLUB	ASPEN	CO	12178
ASPEN CYCLING CLUB	ASPEN	CO	12844
BICYCLE COLORADO	DENVER	CO	12652
COLORADO PLATEAU MOUTAIN BIKE TRAIL ASSN.	MONTROSE	CO	226
INTERNATIONAL MOUTAIN BICYCLING ASSN.	BOULDER	CO	8507
MOUNTAIN MUSHER DOGSLED RIDES	BOND	CO	610
ROUTT COUNTY RIDERS	STEAMBOAT SPRINGS	CO	673
SUMMIT FAT TIRE SOCIETY	BRECKENRIDGE	CO	109
SUMMIT FAT TIRE SOCIETY	BRECKENRIDGE	CO	142
SUMMIT FAT TIRE SOCIETY	DILLON	CO	2693
TEAM EVERGREEN BIKE CLUB	DENVER	CO	285
TRAIL ACTION GROUP	VAIL	CO	12040
MOTORIZED RECREATIONAL ORGANIZATION			
BLUE RIBBON COALITION	IDAHO FALLS	ID	12819
COHVCO	LITTLETON	CO	13550
COLORADO 500	BASALT	CO	14385
COLORADO OFF-HIGHWAY VEHICLE COALITION	LITTLETON	CO	14532
COLORADO OHV COALITION	SANTA FE	CO	547
COLORADO SNOWMOBILE ASSOCIATION	LOVELAND	CO	761
HIGH COUNTRY 4-WHEELERS	BASALT	CO	12717
HIGH COUNTRY SNOWMOBILE CLUB/ SUMMIT COUNTY	FRISCO	CO	13107
MOTORCYCLE TRAIL RIDING ASSOCIATION, ROARING FORK CHAPTER	CARBONDALE	CO	11522
MT. SOPRIS RECREATIONAL RIDERS	CARBONDALE	CO	110
ROUNDUP RIDERS OF THE ROCKIES	DENVER	CO	11891
ROVER RIDERS 4-WD CLUB	BRECKENBRIDGE	CO	1587
SNOWSKIPPERS	GRAND JUNCTION	CO	2510
SUBLETTE RIDERS ASSOCIATION	PINEDALE	WY	7401
SW 4 WHEEL DRIVE ASSN	LOS ALAMOS	NM	237

CONSERVATION/PRESERVATION ORGANIZATION			
AMERICAN RIVERS	WASHINGTON	DC	12228
ASPEN WILDERNESS WORKSHOP	ASPEN	CO	14358
ASPEN WILDERNESS WORKSHOP	ASPEN	CO	14359
ASPEN WILDERNESS WORKSHOP	ASPEN	CO	14360
ASPEN WILDERNESS WORKSHOP	ASPEN	CO	14498
BIODIVERSITY LEGAL FOUNDATION	LOUISVILLE	CO	10863
BLUE RIVERS GROUP SIERRA CLUB	FRISCO	CO	8301
BOULDER CHPT OF THE SOCIETY FOR CONSERVATION OF BIODIVERSITY	BOULDER	CO	11895
BURNS HILLS WILDLIFE ASSOCIATION	EAGLE	CO	3760
CARSON FOREST WATCH	LLANO	NM	720
COLORADO CHAPTER WILDLIFE SOCIETY	FRUITA	CO	11502
COLORADO ENVIRONMENTAL COALITION	DENVER	CO	12237
COLORADO ENVIRONMENTAL COALITION	DENVER	CO	14521
COLORADO NATIVE PLANT SOCIETY CONSERVATION COMMITTEE	GRAND JUNCTION CO	CO	11422
COLORADO WILD	BOULDER	CO	14357
COLORADO WILD	BOULDER	CO	14366
COLORADO WILD	DENVER	CO	14388
COLORADO WILDLIFE FEDERATION	LAKEWOOD	CO	4706
COLORADO WILDLIFE FEDERATION	LAKEWOOD	CO	11885
COLORADO WILDLIFE FEDERATION	LAKEWOOD	CO	14566
CRESTED BUTTE WILDFLOWER FESTIVAL	CRESTED BUTTE	CO	6138
CRYSTAL VALLEY ENVIRONMENTAL PROTECTION AGENCY ASSN	CARBONDALE	CO	8510
EARTH JUSTICE LEGAL DEFENSE FUND	SALT LAKE CITY	UT	7592
ENOS MILLS GROUP SIERRA CLUB	DENVER	CO	8325
FRIENDS LOWER BLUE RIVER	SILVERTHORNE	CO	11464
FRIENDS OF INDEPENDENCE PASS	ASPEN	CO	11371
FRIENDS OF ROXBOROUGH STATE PARK	LITTLETON	CO	2949
FRIENDS OF THE EAGLES NEST WILDERNESS	FRISCO	CO	272
FRIENDS OF THE EAGLES NEST WILDERNESS	SILVERTHORNE	CO	10864
FRIENDS OF WATERTON CANYON GATEWAY	LITTLETON	CO	2948
GRAND VALLEY AUDOBON SOCIETY	GRAND JUNCTION	CO	5936
GRAND VALLEY ANGLER CHAPTER TROUT UNLIMITED	GRAND JUNCTION	CO	8491
GRAND VALLEY CITIZENS ALLIANCE	PARACHUTE	CO	7780
HIGH COUNTRY CITIZENS ALLIANCE	CRESTED BUTTE	CO	1155
HIGH COUNTRY CITIZENS ALLIANCE	CRESTED BUTTE	CO	13549
HOLY CROSS WILDERNESS DEFENSE FUND	BOULDER	CO	12226
INTERNATIONAL ORDER OF ROCKY MOUNTAIN GOATS	SALIDA	CO	4141
JOTE – JEWS OF THE EARTH	BOULDER	CO	7759
KETTLE RANGE CONSERVATION GROUP	REPUBLIC	WA	670
KLAMATH-SISKIYOU WILDLANDS CENTER	WILLIAMS	OR	7579
LAND & WATER FUND OF THE ROCKIES	BOULDER	CO	2469
LAND & WATER FUND OF THE ROCKIES	BOULDER	CO	14393
LAND & WATER FUND OF THE ROCKIES	BOULDER	CO	14530
MOUNT EVANS GROUP/SIERRA CLUB	EVERGREEN	CO	13461
NATIONAL FOREST PROTECTION ALLIANCE	SANTA FE	NM	11206
NATIONAL FOREST PROTECTION ALLIANCE	SANTA FE	NM	13368
NATIONAL WILDLIFE FEDERATION	BOULDER	CO	14283
NORTH COAST ENVIRONMENTAL CENTER	EUREKA	CA	14328
PACIFIC RIVERS COUNCIL	EUGENE	OR	14292

CONSERVATION/PRESERVATION ORGANIZATION			
PROJECT EARTH	ASPEN	CO	275
ROARING FORK CONSERVANCY	BASALT	CO	14174
ROCKY MOUTAIN ECOSYSTEM DEFENSE	REPUBLIC	WA	653
ROCKY MOUTAIN RECREATION INITIATIVE	NEDERLAND	CO	12239
SAN JUAN AUDUBON SOCIETY	DURANGO	CO	939
SAN JUAN CITIZENS ALLIANCE	DURANGO	CO	13456
SIERRA CLUB/ROCKY MOUTAIN CHAPTER/ PIKES PEAK GROUP	MONUMENT	CO	12898
TROUT UNLIMITED	GLENWOOD SPRINGS		12248
VAIL ALPINE GARDEN FOUNDATION	VAIL	CO	12158
WESTERN COLORADO CONGRESS	MONTROSE	CO	13359
WESTERN FIRE ECOLOGY CENTER	EUGENE	OR	11894
WESTERN FIRE ECOLOGY CENTER/ AMERICAN LANDS ALLIANCE	EUGENE	OR	13394
WHITE RIVER CONSERVATION COALITION	BOULDER	CO	14345
WILD WILDERNESS	BEND	OR	623
WILDERNESS SOCIETY	DENVER	CO	14492
WILDERNESS WATCH OF THE EASTERN SIERRA	MAMMOTH LAKES	CA	1903
WILDLIFE MANAGEMENT INSTITUTE	FORT COLLINS	CO	4334
LAND RIGHTS/MULTIPLE USE ORGANIZATION			
FAMILIES FOR RECREATION, ENVIRONMENT, & EQUALITY INC.	PALMER LAKE	CO	13288
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	111
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	404
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	804
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1178
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1403
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1423
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1425
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1599
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1769
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	1866
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	3305
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	12650
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	12666
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	14345
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	14351
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	14567
WHITE RIVER FOREST ALLIANCE	CARBONDALE	CO	14568

Government Agency Comment Letters

This section contains electronically scanned copies of letters we received from government officials and agencies during the official comment period for the draft forest plan and DEIS. Original copies are available for review in a reading file at the Supervisor's Office in Glenwood Springs, CO.

W201

ASPEN · PITKIN
COMMUNITY DEVELOPMENT DEPARTMENT

August 26, 1999

Martha J. Ketelle
Forest Supervisor
White River National Forest
PO Box 948
Glenwood Springs, CO. 81602-0948

Dear Ms. Ketelle,

On behalf of the Pitkin County Board of County Commissioners, I am requesting a 30 day extension of the 90-day public comment period for review of the Proposed Revised Land and Resource Management Plan and DEIS. The additional time is requested to facilitate a thorough review and response to the lengthy, comprehensive and complex Draft Revision Documents. Your consideration is appreciated!

Sincerely,

Ellen Sassano
Senior Long Range Planner
Aspen/Pitkin County Community Development Department

130 SOUTH GALENA STREET · ASPEN, COLORADO 81611-1975 · PHONE 970.920.5090 · FAX 970.920.5439
Printed on Recycled Paper

W202

Est. 1859
BRECKENRIDGE
Colorado's Kingdom

August 24, 1999

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Ave./P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The Breckenridge Town Council would like to request a 60-day extension of the public comment period for the White River National Forest Proposed Revised Land and Resource Management Plan. We believe that the 90-day period allocated is not sufficient to adequately address all of our issues and concerns with the Plan. The preferred alternative indicates a management scheme with a very different focus from that of the current approach. We believe it is necessary to have the time to educate ourselves on the issues and thoroughly review the volume of documentation provided.

In addition to this specific request for a 60-day extension on the public comment period, we would like to request that the timeframe and process for evaluating the Travel Management Plan be separated from that of the Forest Plan. These two documents require different decisions and we would like to ensure that enough time and analysis is allowed for each of them. We believe that there needs to be additional solicitation of public input and field verification for the information analyzed in the Travel Management Plan. To address both of these documents in the same period under the same time constraints does not allow for the focus and intensity of evaluation that is needed for each of them individually.

We appreciate your consideration of our request and ask that you keep us informed of its status.

Sincerely,

Stephen West
Mayor

Town of Breckenridge
150 Ski Hill Road • P.O. Box 168 • Breckenridge, Colorado 80424
(970) 453-2251 • FAX (970) 547-3104

Est. 1859
BRECKENRIDGE
Colorado's Kingdom

W204

August 24, 1999

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Ave./P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The Breckenridge Open Space Advisory Commission would like to request a 60-day extension of the public comment period for the White River National Forest Proposed Revised Land and Resource Management Plan. We believe that the 90-day period allocated is not sufficient to adequately address all of our issues and concerns with the Plan. The preferred alternative indicates a management scheme with a very different focus from that of the current approach. We believe it is necessary to have the time to educate ourselves on the issues and thoroughly review the volume of documentation provided.

In addition to this specific request for a 60-day extension on the public comment period, we would like to request that the timeframe and process for evaluating the Travel Management Plan be separated from that of the Forest Plan. These two documents require different decisions and we would like to ensure that enough time and analysis is allowed for each of them. We believe that there needs to be additional solicitation of public input and field verification for the information analyzed in the Travel Management Plan. To address both of these documents in the same period under the same time constraints does not allow for the focus and intensity of evaluation that is needed for each of them individually.

Aside from these requests, we would like to express the following concerns that we have with the general direction of Preferred Alternative D. We will be submitting additional comments at a later date.

- There is too much of a de-emphasis on outdoor recreation, which is the life-blood of Summit County. We believe that this not only threatens the economy and quality of life of our communities, but is also contradictory to the traditional uses and management of the Forest in this area.

Town of Breckenridge
150 Ski Hill Road • P.O. Box 168 • Breckenridge, Colorado 80424
(970) 453-2251 • FAX (970) 547-3104

W204

- We feel that an approach that attempts to find more of a balance between ecological conservation and recreation management, similar to Alternative C, would be more appropriate for our region.

- We are very concerned with the notion that in many areas trails would be closed to users unless specifically designated as open. Many of the trails in our system in the Upper Blue River Basin have been developed as social trails, many even originating during the mining era. While we recognize the need to better manage the condition and extent of trails throughout the Forest, we question the ability of the Forest Service to manage closures and restrictive designations. We also do not see the need to close the number of trails suggested by Alternative D and at the same time restrict use on any trails that have not gone through the proper process of evaluation to assess the appropriateness of their use and management. There are many trails that are currently missing from the Forest Roads and Trails maps. To simply delete these trails from the analysis and system and consider them automatically closed would be unfortunate.

We appreciate your consideration of our request and ask that you keep us informed of its status.

Sincerely,

Scott Yule

Scott Yule
Chairman

W235

SUMMIT COUNTY
BOARD OF COUNTY COMMISSIONERS

August 20, 1999

Martha Ketelle, Forest Supervisor
900 Grand Avenue;
P.O. Box 948
Glenwood Springs, Colorado 81602

Re: Request for Extension of Comment Period for Forest Plan Revisions

Dear Martha:

The Board of County Commissioners is in receipt of the proposed Revised Land and Resource Management Plan and the accompanying Draft Environmental Impact Statement for the White River National Forest.

Summit County appreciates the tremendous commitment that that has been made in creating this very important document. The Board recognizes the importance of planning for our future and how uses on lands administered by the Forest Service will serve to mold the future of Summit County. While the proposed revised plan and supporting documentation are impressive and critical components in developing a plan for the forest, the most important ingredient in any planning effort is working with the public to insure that the plan is reflective of community desires.

Using the tremendous wealth of information presented in the revised plan and supporting documentation, Summit County would like to assist your office in working with our citizens to provide you with recommendations as to how the plan may be finally shaped to be consistent with local plans and reflective of community desires. The County also intends on working with other affected counties to provide you with recommendations that reflect common interests of all the affected counties. While the Board trusts that these local recommendations will be helpful to you and the Regional Forester in making final revisions to the Forest Plan, the Board also recognizes and honors the fact that in finalizing the plan it is your charge to adopt a plan that incorporates input you receive from other local, state and national interests.

In an effort to meet your 90-day comment period, the Board of County Commissioners has endorsed a public review and participation strategy to review the proposed Forest Plan and accompanying documentation. As reflected in the attached outline, the Board has requested a significant reallocation of staff time to insure that the proposed plan is reviewed against our local basin and countywide plans. This level of commitment is warranted given the policy of the Countywide Comprehensive Plan which states, "The County should fully participate in revisions to the Forest Service's Land and Resource Management Plan, Land Ownership Adjustment Plan and other Forest Service planning efforts to encourage consistency between County and Federal plans."

While the County will work diligently to develop our recommendations and comments by November 5, 1999, it is likely to assume that issues will come up at our local level and in working with other counties that cannot be resolved within this 90-day period. Given the possibility of such controversy and the need for the County to have additional time to consider divergent community opinions and views, the Board of County Commissioners respectfully request a minimum of a 90-day extension to the comment period. Recognizing the important role that his plan will have in shaping local communities and the tremendous investment the Forest Service has already made in developing this plan, such an extension seems to be reasonable and prudent.

Sincerely,

Thomas A. Long
Chairman

Gary M. Lindstrom
Commissioner

William C. Wallace
Commissioner

cc: Don Carroll, Interim District Ranger, Dillon Ranger District, USFS
Bob Taylor, County Manager
Steve Hill, Community Development Director

SUMMIT COUNTY GOVERNMENT • POST OFFICE BOX 68 • BRECKENRIDGE, COLORADO 80424 • 970-453-2561

W235

Task Outline for Review of the
White River National Forest Plan and Draft Environmental Impact Statement

Task	Staff	Date
BOCC Worksessions		8/9/99 and 8/16/99 ongoing updates
Staff Review of Plan and Draft EIS Each staff person has been assigned multiple sections of the document to review for issues such as consistency with master plans, identification of most appropriate alternatives, etc.	Mark Truckey Brian Lorch Charmin Bogart Holly English Todd Robertson Jim Curnutte Steve Hill	8/9/99-9/6/99
NWCOG Meetings Joint county effort to respond to Plan/EIS	Steve Charmin BOCC representative	8/11/99 and subsequent meetings
Updates to planning commissions (Snake River, Upper Blue, Lower Blue, Ten Mile, Countywide) and the OSAC Initial discussion item to familiarize commissions with plan and ask for their review.	Jim, Charmin, and Mark	8/19/99, 8/26/99, 9/1/99, 9/2/99, 9/9/99, 9/13/99 regular meetings
USFS Open House Meeting @ Summit Middle School Overview of plan and request for comments put in by forest service.		9/7/99
Planning staff final develops final staff analysis of the plan	All staff listed above	9/8/99
Public Notice for work sessions with all planning commissions and OSAC		Per notice requirements
Public work sessions on Plan/EIS with each planning commission and OSAC as part of regular commission agendas. Public comments and commission comments recorded.	Mark, Brian, and Jim	9/16/99, 9/23/99, 10/4/99, 10/6/99, 10/7/99, 10/14/99
Special meetings of the planning commissions to complete work sessions described above.	Mark, Brian, and Jim	Dates to be determined
Prepare letters to USFS with comments about Plan & DEIS from each individual planning commission and OSAC. Prepare official County response signed by BOCC chair incorporating comments from individual commissions where appropriate. Final decision on types of responses still to be determined.	Mark, Brian, and Jim	10/29/99 (Deadline for comments: 11/5/99)

W252

OFFICE OF THE
BOARD OF COMMISSIONERS
(970) 328-8605
FAX (970) 328-7207
TDD (970) 328-8797
Email: Eagleco@vail.net
http: //www.eagle-county.com

EAGLE COUNTY, COLORADO

JOHNNETTE PHILLIPS
JAMES E. JOHNSON, JR.
TOM C. STONE

September 1, 1999

Martha Ketelle, Forest Supervisor
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 81602

Dear Ms. Ketelle,

Thank you for the tremendous efforts that have been expended by your staff to produce the draft update of the White River National Forest Plan. It's truly an impressive document. In addition, we reiterate our appreciation for the opportunities provided by the Forest Service for public participation and contribution to the issue definition phase of this planning process.

However, we have significant concerns regarding the ability of our local officials and staff to effectively review and comment upon this massive document in a timely manner. We have been informed by Dan Hormaechea that we may request a thirty day extension of the ninety day review period. While this is a welcome gesture, we do not consider this sufficient opportunity for local government response to a document that took three years to prepare, with untold expert staff contributions and a budget nearing $7 million.

We understand that the Forest Service desires to build an ongoing relationship with local governments and other relevant stakeholders. We welcome this opportunity for dialogue and openness. We believe that the first true gesture for building this dialogue will be to relax the 90 day response period and allow for at least 120 days merely to identify our concerns and hopes for the Forest in relation to the preferred alternative selected. Beyond this, we will need additional time to build a constructive dialogue with the Forest Service to cultivate the opportunities to build partnerships and enhance the management performance of the White River National Forest. Thank you for your consideration.

Sincerely,
EAGLE BOARD OF COUNTY COMMISSIONERS

Johnnette Phillips
Chairman

Tom C. Stone
Commissioner

James E. Johnson Jr.
Commissioner

BOCC/AC/rf

cc: Senator A. Wayne Allard
Senator Ben Nighthorse Campbell
Representative Scott McInnis

W284

SUMMIT COUNTY
COMMUNITY DEVELOPMENT DIVISION

September 8, 1999

Martha Ketelle, Forest Supervisor
900 Grand Avenue
P.O. Box 948
Glenwood Springs, Colorado 81602

Dear Ms. Ketelle:

The Upper Blue Planning Commission is in receipt of the proposed Revised Land and Resource Management Plan and the accompanying Draft Environmental Impact Statement for the White River National Forest. As is planned for all other basin planning commissions in Summit County, we are scheduling meetings to discuss the Plan/DEIS and to take public comment on the proposal. At the conclusion of the meetings, we will provide comments representing the collective views of the citizens of the Upper Blue basin.

While we will work diligently to develop our recommendations and comments by the November 5, 1999 comment period deadline, it is likely to assume that issues will come up that cannot be resolved within this 90 day period. In addition, the Plan/DEIS documents are extensive and will require a fair amount of time for the commission and the public to review before a true comprehension of their contents is realized. Given the need to have additional time to consider divergent community opinions and time needed to give the document meaningful review, the Upper Blue Planning Commission respectfully requests a minimum of a 90 day extension to the comment period. Recognizing the important role that this plan will have in shaping local communities and the tremendous investment the Forest Service has already made in developing this plan, such an extension seems to be reasonable and prudent.

Sincerely,

Bobby Craig, Chairperson,
Upper Blue Planning Commission

cc: Don Carrol
Upper Blue Planning Commissioners
Steve Hill

SUMMIT COUNTY GOVERNMENT • P.O. Box 5660 • FRISCO, CO 80443
(970)668-4200 Fax (970)668-4225

Comment N: W286
Date Receiv
Logged in by

Comments??

White River National Forest Plan Revision

This form is for you to offer your views on the preferred alternative, major topics analyzed, or other topics of interest related to the Forest Plan Revision process. Please send your comments to us by November 5, 1999, so we may consider them in our final analysis.

Name Amy Ostrander
Business/Organization Summit Stage
Address PO Box 8
City Breckenridge State CO Zip 80424

Topic(s):
- ___ Biological Diversity
- _X_ Travel Management
- ___ Recreation Management
- ___ Roadless Area Allocation and Management
- ___ Special Area Allocation and Management
- ___ Allowable Sale Quantity/Level of Timber Harvest

9/8/99

On behalf of the Summit Stage Transit Board and the Summit County Transportation Advisory Board, we are asking for clarification of the potential for transit alternatives under Alternative D.

Our understanding is that Alternative C is the only option that includes an aerial tramway option. I have been unable to find any reference that would preclude the use of transit – shuttles, bus service, vans - on existing roadways. Our interest is that we not eliminate future opportunities to provide access through creative use of transit. Several examples currently in use include the Roaring Fork Transit Agency service to Maroon Bells and the winter time use of snowcats to Trapper Lake.

We will appreciate the opportunity to learn more about any restrictions that may prevent the effective use of transit in the future.

Attach additional sheets if necessary.

W287

SCOTT McINNIS
3D DISTRICT, COLORADO

COMMITTEE ON WAYS AND MEANS

WASHINGTON OFFICE:
320 CANNON BUILDING
WASHINGTON, DC 20515–0603
(202) 225–4761
FAX: (202) 226–0622

DISTRICT OFFICES:
134 WEST B STREET
PUEBLO, CO 81003
(719) 543–8200
FAX: (719) 543–8296

225 NORTH 6TH STREET
SUITE 702
GRAND JUNCTION, CO 81501
(970) 245–7197
FAX: (970) 245–2194

1060 MAIN AVENUE
102
DURANGO, CO 81301
(970) 259–2754
FAX: (970) 259–2762

526 PINE STREET
SUITE 111
GLENWOOD SPRINGS, CO 81601
(970) 928–0627
FAX: (970) 928–0630

Congress of the United States

House of Representatives

Washington, DC 20515–0603

September 9, 1999

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
Post Office Box 948
Glenwood Springs, Colorado 81602

Dear Ms. Ketelle:

I am sending this correspondence to you regarding the newly proposed White River National Forest Plan.

I strongly request an extension of the time for public comment regarding the alternatives in the White River National Forest Plan. Ninety days of public comment is an insufficient amount of time for a plan that has taken over two years to prepare, which will impact my constituents in the counties affected for the next fifteen years. I believe the comment period should extend, at least, another 180 days so that my constituents may have the opportunity to make constructive comments. The thirty day extension approved by the Forest Service is simply not enough time for constructive review and criticism of the plan.

I have spoken with many county commissioners and Colorado state government officials affected by this plan, and they agree that more time is needed for the comment period. I also understand that many individuals have contacted their local White River National Forest office and were told they could not have copies of the plan because none were available. This shortage should be reason enough to delay the comment period so those waiting to receive newly printed plans can make their judgments, and consequently give the Forest Service the opportunity to make a better decision with a quantitative opinion from the general public.

The decision you and your colleagues make regarding the future of the White River National Forest affects the livelihood of every constituent who lives in Eagle, Garfield, Gunnison, Mesa, Moffat, Pitkin, Rio Blanco, Routt and Summit counties. These people have a strong interest in the manner the forest will be managed; therefore, I ask the Forest Service to extend the comment period an extra 180 days so every impacted party has a meaningful opportunity to provide constructive comments.

PRINTED ON RECYCLED PAPER

W287

(Martha Ketelle, pg. (2))

Thank you for your consideration and attention to this important matter.

Sincerely,

Scott McInnis
Member of Congress

SM: wre

cc: Lyle Laverty, Regional Forester
Rocky Mountain Region
USDA Forest Service

W288

TOWN of FRISCO

P.O. Box 4100 • Frisco, Colorado 80443

September 9, 1999

Martha Ketelle
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602-0948

Dear Ms. Ketelle:

In regard to the White River National Forest Plan update process, the Town of Frisco would like to request an extension be given to the November 6, 1999 comment period deadline. Upon quick review, it appears that the Forest Service's preferred scenario, Alternative D is a substantial change in philosophy for managing the White River National Forest. In order for the town to make the most constructive and appropriate comments and decisions on the update process and Alternative D, the town needs more time.

The Frisco Town Council requests an extension to the comment period so that we may conduct a more in-depth review of the forest plan's update.

Thank you for this consideration.

Sincerely,

M.L. "Tex" Etie
Mayor

(970) 668-5276 • Fax: (970) 668-0677 • Denver Direct: 893-1855 • Email: frisco@colorado.net

W387

Est. 1859
BRECKENRIDGE
Colorado's Kingdom

September 14, 1999

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Ave./P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The Breckenridge Town Council and Open Space Advisory Commission would like to express our support of Representative Scott McGinnis's request for a 180-day extension on the comment period for the Draft Forest Plan. There are many issues in this plan that significantly impact the residents and visitors of Breckenridge and Summit County. We feel that the decisions made on this document could have far-reaching consequences. For this reason, we want to be sure that our elected officials and residents have had sufficient time to analyze and discuss the relevant information and make well-informed comments.

The Town of Breckenridge also continues to feel that the schedule for evaluating the Travel Management Plan should be separated completely from the Forest Plan. We understand that the two documents were prepared under the same NEPA process, but they have very different focuses and require very different types of analyses. We feel that additional time is needed to field-verify the trail management decisions indicated in the document. In addition, the Forest Service has not offered sufficient data or other information to support many of the trail closures and restrictions. We feel that it is important for public investment in and compliance with this plan to supply this type of background.

We appreciate your consideration of our request and ask that you keep us informed of its status.

Sincerely,

Stephen West
Mayor

Scott Yule
Chairman, Open Space Advisory Commission

Town of Breckenridge
150 Ski Hill Road • P.O. Box 168 • Breckenridge, Colorado 80424
(970) 453-2251 • FAX (970) 547-3104

W424

Town of Crested Butte

P.O. Box 39
Crested Butte, Colorado 81224
—A National Historic District—

Phone: (970) 349-5338
FAX: (970) 349-6626

September 21, 1999

White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

To Whom This May Concern:

We learned yesterday that copies of the Draft White River National Forest Plan have not been mailed to people who have asked for them, yet the deadline for comments is November 5, 1999. Since the document is so large and will take time to review, we ask that an extension of time for comments be granted. The extension should be timed so that the deadline does not fall at or near Christmas or New Years. We feel January 15, 2000, would be best.

Please also send a copy of the Draft White River National Forest Plan to the Town and please explain why you are considering closing the East and West Maroon Pass trails between Crested Butte and Aspen.

Sincerely,

Victor R. Shepard,
Mayor.

W435

SUMMIT COUNTY
BOARD OF COUNTY COMMISSIONERS

September 20, 1999

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Ave./P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The Summit County Board of County of Commissioners would like to request that both the timeline and decision for the Travel Management Plan be separated from the Forest Plan. The Draft EIS does not include a requirement that both decisions be contained in one document. Separating the Travel Management and Forest Plan decisions would facilitate a higher level of understanding of all the issues contained, and foster more intelligent and enforceable travel management strategies.

Developing effective and enforceable travel management strategies on our District requires more *site specific* information, including field inventories and verification, trail and road condition surveys, and further analysis of user patterns. We believe that portions of the current Travel Management Plan are based on both insufficient and inaccurate information. In addition, the proposed Travel Management Plan lacks an overall urban interface strategy that manages use of the Forest adjacent to highly populated areas. Both decisions merit sufficient time and analysis. To address both of these documents in the same period does not allow for the level of scrutiny necessary for each decision.

We understand the Forest Service is greatly understaffed, especially at the District level. Thus, we must assume that the current Forest and Travel Management Plans will be enforced largely through public buy-in. We believe public acceptance and compliance can be better achieved if the Forest Service commits to a community based, collaborative process for Travel Management that allows sufficient time for data collection, field verification, and public participation.

We appreciate your consideration of our requests and look forward to hearing a response.

Respectfully submitted,

Thomas A. Long
Chairman

SUMMIT COUNTY GOVERNMENT • P.O. BOX 68 • BRECKENRIDGE, CO 80424
(970)453-2561 Fax (970)453-3535

W1527

USDA
WHITE MAILROOM
1999 NOV 23 AM 8:10

San Juan County
Board of Commissioners
P.O. Box 466
Silverton, CO 81433

Forest Planning Team
White River National Forest
P.O. Box 948
Glenwood, Springs, CO 81602

November 21, 1999

Re: Management Plan Proposal for the White River National Forest

I am very much in favor of "Alternative D" as the management plan for the White River National Forest. Thank you for placing the protection of wildlife as a top priority. Thanks for having the guts to place restrictions on motorized travel in our national forest.

I'll be watching with interest to see what happens in the White River National Forest. The San Juan National Forest is in our county and we will be facing similar issues soon.

Sincerely,

Christine K. Smith
San Juan County Commissioner

W1600

REC
WRNF
1999 NOV 2

Pitkin County

RECEIVED
NOV 15 1999
Regional Forester

November 9, 1999

Rep. Scott McInnis
215 Cannon House Office Building
Washington, DC 20515

Dear Representative McInnis:

We were disturbed to read that you are urging the U.S. Forest Service to scrap the White River National Forest Management Plan and that you are particularly critical of the selected Alternative D.

The Forest Service conducted an extensive and thorough 3-year investigation into the health of the White River National Forest; all the users and stakeholders were invited to work with the Forest Service to develop alternatives and to select the most appropriate plan. The proposed 10-Year Plan reflects both the need to preserve and protect our wild lands, and the need for the public to access the forest for recreation and spiritual renewal.

Our public lands provide the resource that brings visitors to Colorado; therefore, it is essential that we, as stewards of that resource, protect the forest lands for both economic and ethical reasons.

We urge you to support the U.S. Forest Service Proposal. We, as well as numerous other agencies and individuals, are looking closely at the plan and will be submitting additional comments regarding specific aspects of the proposal for refinement. Offsite impacts and identification of lands for mixed use are only two aspects of the plan that need more attention. The Forest Service is seeking a balanced approach through this process in order to address preservation and protection, as well as responsible use of the land as a recreational and economic resource.

The process and the forest lands will best be served if we all work together to refine the details for an acceptable long range plan; the citizens who worked many volunteer hours

Administration
530 E. Main, Suite 301
Aspen, CO 81611
(970) 920-5200
FAX 920-5198

County Commissioners
Suite 301
530 E. Main Street
Aspen, CO 81611
(970) 920-5150

County Attorney
Suite 302
530 E. Main Street
Aspen, CO 81611
(970) 920-5190

Finance and Use Tax
530 E. Main, Suite 201
Aspen, CO 81611
(970) 920-5220
FAX 920-5230

PRINTED ON RECYCLED PAPER

W1600

to create the plan will be ill served if the plan is thrown out to accommodate the complaints of a few.

Regards,

PITKIN COUNTY COMMISSIONERS

Leslie J. Lamont

Leslie Lamont, Chair

Shellie Harper, Vice Chair

Shellie Cg Harper

Dorothea Farris

Dorothea Farris

Patti Clapper

Patti Clapper

Mick Ireland

M. Ireland

cc:
Lyle Laverty, US Forest Service
Senator Ben Nighthorse Campbell
Senator Wayne Allard
Representative Joel Hefley
Representative Bob Schaffer
Representative Tom Tancredo

Pitkin County
530 East Main Street, 3rd Floor
Aspen, Colorado 81611

Lyle Laverty
Regional Forester
PO Box 25127

.

W2311

STATE OF COLORADO

OFFICE OF THE EXECUTIVE DIRECTOR

Department of Natural Resources
1313 Sherman Street, Room 718
Denver, Colorado 80203
Phone: (303) 866-3311
TDD: (303) 866-3543
Fax: (303) 866-2115

DEPARTMENT OF NATURAL RESOURCES

Bill Owens
Governor

Greg E. Walcher
Executive Director

December 28, 1999

Mr. Lyle Laverty
Rocky Mountain Regional Forester
United States Forest Service
P.O. Box 25127
Lakewood, Colorado 80225-0127

Dear Lyle:

On behalf of the State of Colorado, we appreciate the opportunity to comment on the proposed revision of the White River National Forest Land and Resource Management Plan. These comments are in addition to the more general comments in our letter dated September 22, 1999. As we have discussed, we hope these more detailed analyses will be more helpful to the Forest Service, as you seek to balance the competing and conflicting interests in this vitally important area.

As you know, the Colorado Department of Natural Resources and its divisions have always worked closely with federal land management agencies in developing their management plans. In some parts of the State, we even jointly manage some facilities. Consequently, we highly value these relationships. In the case of the White River National Forest Plan, the Department, through the Division of Wildlife, has provided significant input and analysis since 1996 on wildlife management. Since these complex issues also involve a significant impact on recreational users of the forest, such as trail and road users, these comments include concerns of the Division of Parks and Outdoor Recreation. There are differing perspectives on whether policy should focus on dispersing trail use, as many users prefer, or concentrating it, as wildlife officials recommend. These differences exist within the general public, as well as within the agencies of state government, and these comments reflect those various perspectives. Additionally, there are critically important water issues involved in the proposal of special concern for Colorado water users, which have consequences to the administration of our state's system of water law. Thus, significant concerns of the Colorado Water Conservation Board are also included. There are also potential impacts in the proposal to the oil and gas, mining, and timber industries. We believe these important issues and concerns can be addressed over time within the context of various management plans. We look forward to working closely with the Forest Service on those issues in the coming months.

Governor Owens has asked the Department of Natural Resources to coordinate the comments of these various divisions in order to provide the most helpful and consistent input to the Forest Service. Accordingly, the Department's comments on this proposal are organized into the three major areas of current public debate: outdoor

W2311

recreation, wildlife, and water supply. Water and air quality are more appropriately addressed by the Department of Public health and Environment. General forest health issues should be addressed by the Colorado State Forest Service.

The proposed plan addresses these issues in varying detail in several different alternatives, including the status quo. It is not the State's intention to endorse a particular alternative, but to express a number of serious concerns that can be addressed within the context of various alternatives, or in a combination of those listed.

Certainly under any alternative or combination, the Forest Service must provide an array of potential management tools to benefit the full spectrum of natural resource issues: wildlife species, including threatened and endangered and declining species; road and trail density, use, and restoration; watershed management; and the treatment of special interest areas. The Forest Service's historic challenge is to manage the many important uses of the White River National Forest while protecting and enhancing Colorado's natural resources and maintaining the long-term productivity and sustainability of the land.

The White River National Forest Plan will have a significant impact on Western Colorado for years to come. We believe it is essential that the Forest Service work closely with the communities in the region to implement a plan that recognizes national environmental goals, but in the context of regional environmental and economic values. We believe it is possible, indeed essential, to balance both objectives, and we look forward to working with the Forest Service to that end.

These comments are a collaborative effort involving the work of a number of state officials over a period of many months. That includes work by staff in the Executive Director's Office, the Division of Wildlife, and Division of Parks and Outdoor Recreation, and the Water Conservation Board. Specifically, the wildlife section includes the work of Ron Velarde, Mike Grode, John Toolen, Dave Langlois, Bob Towry, Director John Mumma and numerous members of their staffs. The Parks and Outdoor Recreation section includes the work of Tom Easley, Stuart MacDonald, Tom Kenyon, Director Laurie Mathews and several others on their staffs. The water section includes the work of Dan Merriman, Todd Doherty, Dan McAuliffe, Director Peter Evans and others. At the Department level, contributors included Assistant Directors Kent Holsinger and Tim Pollard, and Deputy Director for Policy Ron Cattany.

Thanks for considering the attached comments. We are available to discuss them with you as appropriate.

Sincerely,

Greg E. Walcher,
Executive Director

I. OUTDOOR RECREATION ISSUES AND COMMENTS

General Comments

The content of the White River National Forest Land and Resource Management Plan that directly intersects the statewide outdoor recreation mission of the Colorado Division of Parks and Outdoor Recreation (State Parks) consists of the considerable attention devoted in the plan to management of trails on the Forest. Since 1971, State Parks has been statutorily authorized and directed to address trails on a statewide basis, regardless of state, local, federal or private jurisdiction over particular trails. To implement the statutory charge to assist public agencies and private entities in planning, designing and funding trails for public use and enjoyment, State Parks established the State Trails Program. An advisory body, the State Trails Committee, is appointed by the State Parks Board to assist in guiding the policies and activities of the Trails Program. State Parks is further statutorily directed to administer a Snowmobile Program and an Off-Highway Vehicle Program, which are funded through snowmobile and off-highway vehicle registration fees respectively.

WHITE RIVER PLAN CONTENT:

The State Trails Program has found that trail users regard the 1,700-page plan with considerable interest and concern, as many changes that affect forest trails are proposed among the various management alternatives. Each alternative has a site-specific travel management plan identifying road closures and obliteration, road and trail uses, seasons of use, and use restrictions, for both motorized and non-motorized uses. The travel plan approval process is simultaneous with the Forest Management Plan (Appendix O), so trail users are involved, informed and concerned.

The Forest Service now recommends "Alternative D" as its preferred alternative, and describes it as follows:

"This alternative was developed in response to concerns that wildlife habitat for a wide variety of species, as well as biological diversity as a whole, needs to be given special emphasis. It addresses the idea that a higher priority be given to physical and biological resources than to human uses of the Forest. . . It represents an aggressive approach to habitat management and places a low emphasis on letting natural processes run their course. It will use active management to make the most rapid progress, compared to other alternatives, toward a diverse, healthy ecosystem condition. Alternative D places a low emphasis on new developments for human uses or recreation while maintaining existing developments."

The Plan also states that:

"Overall, the wildlife resources and associated habitats on the Forest are in good condition. Forest management actions are not expected to significantly affect species viability in any alternative. Most of the activities with the

potential to negatively affect wildlife resources are occurring on private lands adjacent to the Forest."

Of interest to trail users and the State Trails Program are the specific provisions which would close or restrict access to trails and roads. Appendix O, the travel management plan, attempts to list every road and trail. It indicates the proposed management status of each alternative compared to Alternative B, the current situation. Currently there are 1,895 miles of forest trails; 1,063 miles are open to mountain bicycling. The 32% of the Forest designated as Wilderness contains 831 trail miles, where no mechanized trail use is allowed. There are also 135 miles of motorcycle trails in the Forest, with 91 miles open to All Terrain Vehicles (ATV's).

The recommended Alternative D would make these changes (numbers are approximate):

- 130 roads and trails would be closed to all uses, both motorized and non-motorized.
- Over 700 additional roads and trails would be closed to bicycles.
- 340 roads and trails would be closed to motorized use.
- 1,150 roads would be subject to a variety of "road use restrictions."
- A small number of existing routes now closed would be open to motorized use.
- Many other routes involve seasonal closures and specific user group restrictions.

An issue that has received considerable attention among trail users is the closure of areas of the Forest to off-road and off-trail travel. Currently about 82% of the non-wilderness in the White River National Forest is open to unrestricted travel by non-motorized, mechanized (bicycle) means, about 1,524,000 acres. Alternative D would restrict all mechanized travel to designated routes. Horse and foot travel would remain virtually unrestricted on the entire Forest.

Similarly, Alternative D would restrict all summer motorized travel to designated routes. Currently, about 9% of the non-wilderness area is open to off-road travel, with some restrictions on full-size motor vehicles.

In winter, motorized travel is currently unrestricted on 72% of the forest lands outside designated Wilderness. Alternative D would reduce the area available to unrestricted snowmobile travel by about 500,000 acres of the 1,524,000 currently open. This will require more resources for grooming trails where use is concentrated, due to higher levels of use.

COMMENTS:

These comments are divided into two sections. First are general concerns the State has heard from Trails Program constituents, followed by more specific observations generated by the Trails Program itself.

Constituent Comments:

Trails Program constituents represent a broad cross-section of public and private interests, including organizations representing specific trail user groups (e.g., equestrian

groups, snowmobile and off-highway vehicle clubs, nordic councils, mountain bike organizations); regional and statewide umbrella organizations (e.g., Colorado Snowmobile Association, Colorado Off-Highway Vehicle Coalition, International Mountain Bike Association); local governments; individuals; businesses specializing in outdoor recreation equipment; and environmental organizations.

The State does not attempt to characterize or make value judgments about comments from these groups, as many plan to submit their own comments to the Forest, and some have not completed their analyses. We must note, however, that *several consistent themes have already emerged:*

- The plan is lengthy and difficult to analyze and understand. For instance, some groups note that it is difficult to identify particular trails affected, since trail names assigned by the Forest are often different from those more commonly recognized by trail users.
- Most trail users support the goal of maintaining biological diversity and protecting wildlife habitat. Yet it is difficult to identify specific reasons for decisions that result in closing or restricting use on specific trails, as these reasons are often omitted from the plan.
- Off-trail areas identified for closures or restrictions do not match up well with the physical characteristics of the landscape. Even if a trail user had a map, it would be difficult to identify the lines drawn in the plan with land forms. This will make voluntary compliance very difficult in many cases, and enforcement nearly impossible.
- There will likely be unintended consequences if Alternative D were to be implemented. For example, safety issues will emerge when motorized and non-motorized users are required to use the same trails. Also, some routes proposed for closures currently serve as alternatives to routes left open at higher elevations when those higher elevation trails are exposed to extreme weather conditions, perhaps leading to unsafe trail conditions.
- Trail closures and restrictions will be difficult to enforce, given Forest budget constraints on signing programs and the shortage of field personnel.

Trails Program Comments:

The State Trails Program recently completed a new Strategic Plan, involving substantial public outreach to determine concerns and priorities of trail managers, trail users and the general public. These concerns and priorities were translated into seven strategic goals, all of which can be related in some way to the Forest Service's travel management decisions. To avoid excessive detail, the following comments are designed to focus on specific, concrete actions where the Program's statewide leadership role can intersect with effective planning and implementation on the Forest. At the same time, trail users and trail advocates across the State are concerned about proposed closures of so many miles of existing trails because the public demand for such recreational opportunities is rapidly growing, not shrinking. Thus, such closures will force that growing demand onto a smaller number of trails, increasing the environmental pressures in those areas.

1. **Environmentally appropriate trail planning, design, construction and management.**
   The Trails Program supports the proposed emphasis on biological diversity and habitat protection. Our polling demonstrates that people want to be better stewards of the land. Over three-fourths of poll respondents indicate a preference for better protection of natural features and wildlife habitat. The Program believes that trail users will support stewardship goals if they are clear and understandable. Yet, it is very difficult to link specific trail management actions in Alternative D with specific habitat protection goals.

   In 1998, the Trails Program conducted an inter-disciplinary effort to examine potential environmental impacts of trails and management actions to avoid them. One of the primary results of that investigation was the discovery that very little research has been systematically and comprehensively focused on long-term impacts of trails on wildlife populations. While much can be inferred and general rules of thumb established from existing knowledge, much also remains to be done to identify more specific impacts and management actions to avoid or minimize those impacts.

   Alternative D seems to rely on research more specific than the Program could discover. The Program is very interested in the science behind the Forest's conclusions on appropriate management practices, especially where there are conclusions not supported by the State's research. Any alternatives developed for the Forest Plan should cite these studies, and link specific trail closures and restrictions to their conclusions.

   Instead, Alternative D relies on arbitrary standards such as number of trail miles per square mile of forest that are not adequately explained, and are not supported by any definitive study of the actual impacts of various trail uses on wildlife. These judgments are subjective and often questioned by Colorado wildlife authorities, in addition to the Trails Program.

2. **Integrated planning that preserves critical trail access points, corridors and system links.**
   To achieve this objective, the Trails Program Strategic Plan identified a need to conduct a *federal lands trail needs assessment*. The State Trails Committee believes that effective trail planning needs to start with a comprehensive understanding of specific needs to achieve an integrated trail system. Absent the analyses and establishment of trail needs objectives, decisions on trail closures and restrictions appear arbitrary and ungrounded. The input we have received indicates that many trail constituents have reached that conclusion about Alternative D.

   A more effective approach would be to establish collaborative processes to focus on specific trail management challenges, such as the Vail Pass Task Force. Experience indicates that decision-making informed by participation of the range of interests affected by trail management decisions can lead to practical solutions accompanied by buy-in from trail users. In fact, we are concerned, along with some Vail Pass Task Force members, that decisions

proposed in Alternative D would negate long years of difficult negotiations on effective solutions.

Absent the participation and buy-in that results from collaborative problem-solving, the Forest's enforcement of its trail management decisions will be more difficult to accomplish. This is particularly true in an era of limited federal funding for on-the-ground presence. *The State Trails Program can help through three new initiatives:*

- A new grants program for planning and capacity building,
- A regional trail coordinator who can help facilitate collaborative discussions among constituents.
- A special sub-committee of the Trails Committee that is working with federal agency representatives to tackle the challenge of federal lands needs assessments.

3. **Encouraging trail stewardship through education, partnerships, volunteerism and youth programs.**

In some cases there may be alternatives to trail closures in order to avoid or minimize environmental impacts. Included are educational efforts to inform trail users on appropriate trail use ethics or about the reasoning behind use restrictions. In addition, closures and restrictions may be adopted in some instances due to limited resources to perform trail maintenance activities. Many trails on federal lands were established at a time when trail design and construction practices were less sophisticated than those known today, and can be mitigated through actions like re-construction of existing trails, or re-routing sections to avoid sensitive areas. *The state Trails Program can help in four ways:*

- The Trails Program's Strategic Planning process indicated high potential for building on existing efforts to promote volunteerism to perform work that would otherwise be foregone due to lack of funding. The Program's new Planning and Capacity Building grants can help establish volunteer capabilities.
- There is a high degree of enthusiasm about utilizing the youth corps that is currently enjoying a statewide resurgence. The Trails Program is working with federal funding sources and Great Outdoors Colorado to help support youth corps, accomplishing dual goals of accomplishing much-needed maintenance work and instilling a sense of stewardship among tomorrow's trail constituents.
- The Program's new regional trail coordinators are assigned the responsibilities of working with volunteer groups and youth corps to build these capacities.
- Finally, the Trails Program grants are being refocused to respond to the public recognition that maintenance of existing trails should be a high priority and can be a better option than establishing new trails.

ParksWhiteRiver.doc

5

W2311

II. WILDLIFE ISSUES AND COMMENTS

General Comments

The wildlife bounty associated with the White River National Forest is an historic and cultural tradition, in addition to its extreme importance to the economy of Colorado. It is vital that these wildlife resources be preserved and protected. Whichever alternative for management of the Forest is selected, these values can and should be preserved.

The information provided supporting the purpose and need for a change to the forest plan, including the revision topics (DEIS pages 1-6 through 1-9), is well documented and enjoys significant public support. The extent to which DOW was included in the public involvement and cooperation in the plan revision is commendable and appreciated.

The selection of the six alternatives and the descriptions for each alternative (Chapter 2) is thorough and complete. The analysis in the DEIS regarding wildlife is also thorough and complete and deserves DOW support. The Biological Assessment and Biological Evaluations as presented in Appendix N are well researched and documented. They include thorough analysis.

The Affected Environment and Environmental consequences sections of the DEIS provide thorough assessments and accurate descriptions of the direct and indirect effects on wildlife (pages 3-167 through 3-222). The section discussing the overall and direct and indirect effects on wildlife is of critical importance (3-206 through 3-213). The discussion regarding Research Natural Areas is important as they provide large areas to conserve biological diversity.

Timber Management:

In many areas logging, prescribed fire and other forest management tools can be useful in improving and restoring important wildlife habitat, especially if implemented correctly. Generally, DNR and DOW favor closing and obliterating roads immediately after logging; logging sales and harvest should not be dragged out for years. The length of time a timber sale can remain open for bid and harvest should be defined. Some "5" year sales have been open for 16 years due to contingencies in the sale contract. "Get in and get out" sales tend to have the least impact on wildlife.

ASQ (Allowable Sales Quantity) needs to be adjusted to account for logging in roadless areas through the use of helicopters. At present, the ASQ is only used for areas that can be economically timbered with the use of roads. It has been shown in the South Wagonwheel deadwood timber sale and the logging of green trees in Vail's Category III that the use of helicopter logging is possible. By recognizing the ability to helicopter log,

many present roadless areas can have the vegetation manipulated for better resource management instead of just treating areas with roads or having to build new roads.

Management Area Prescriptions:

5.42 Bighorn Sheep

The USFS recommends that grazing by domestic sheep be prohibited unless adequate temporal and spatial separation can be achieved. The Division of Wildlife concurs with this recommendation and believes that the close association of domestic sheep and bighorn sheep is a major problem facing bighorn sheep. While there are not many 5.42 areas recommended in the WRNF plan, this does make an important statement of the potential disease problem.

Concerning bighorn sheep and domestic sheep allotments, the WRNF, CDOW and several woolgrowers met during the Fall of 1997 and Spring of 1998 to resolve some of these issues. An agreement was reached that several domestic sheep allotments that were vacant should not be filled due to the fact the surrounding areas had changed so much that the domestic sheep allotments were no longer viable. These allotments are listed in table 3-29 page 3-137 (Draft Environmental Impact Statement). These allotments should be considered for permanent closure to benefit bighorns in the ~~Avalanche, Snowmass/Maroon Cr., Battlement Mesa, South Fork White River and~~ Glenwood Canyon bighorn sheep herds. Also, the group recommended that the cattle allotments listed in table 3-28 (same page and document) not be converted to sheep allotments without coordination with the CDOW. We continue to think these are sound recommendations. These recommendations will still leave many bighorn sheep in jeopardy of contact from domestic sheep, but this is a compromise reached to protect the best domestic sheep grazing allotments while protecting bighorn sheep in a few areas of the WRNF where domestic sheep are currently not grazed. These recommendations also allow for some vacant domestic sheep allotments to remain open in case there is a need in the future due to drought or an upturn in the industry.

5.45 Forest Carnivores

The desired condition discusses the need for dense regeneration of conifer forest types, which provide habitat for snowshoe hares eaten by lynx. This may be the most limited habitat condition for lynx in Colorado and, thus, the most badly needed. Some of the worst coniferous habitat types for snowshoe hare and lynx could be the lodgepole pine forests. The WRNF plan states that the forest currently has about 2% of the lodgepole pine in the 1-20 year age class while in 1887, 24% of the forest was in this structural stage. Lodgepole pine ?orests may have the highest potential to produce high densities of snowshoe hare for lynx and other forest carnivores and raptors. However, when these forests mature, they shade out the understory and become almost biological deserts, providing habitat only for red squirrels or hiding cover for big game such as elk. While there is also a need to preserve some mature lodgepole pine, present conditions are outside the historic range of variability (HRV). From an ecological standpoint, it appears the WRNF needs to treat significantly more lodgepole pine forests to obtain a younger 1-

W2311

many present roadless areas can have the vegetation manipulated for better resource management instead of just treating areas with roads or having to build new roads.

Management Area Prescriptions:

5.42 Bighorn Sheep

The USFS recommends that grazing by domestic sheep be prohibited unless adequate temporal and spatial separation can be achieved. The Division of Wildlife concurs with this recommendation and believes that the close association of domestic sheep and bighorn sheep is a major problem facing bighorn sheep. While there are not many 5.42 areas recommended in the WRNF plan, this does make an important statement of the potential disease problem.

Concerning bighorn sheep and domestic sheep allotments, the WRNF, CDOW and several woolgrowers met during the Fall of 1997 and Spring of 1998 to resolve some of these issues. An agreement was reached that several domestic sheep allotments that were vacant should not be filled due to the fact the surrounding areas had changed so much that the domestic sheep allotments were no longer viable. These allotments are listed in table 3-29 page 3-137 (Draft Environmental Impact Statement). These allotments should be considered for permanent closure to benefit bighorns in the ~~Avalanche, Snowmass/Maroon Cr., Battlement Mesa, South Fork White River and~~ Glenwood Canyon bighorn sheep herds. Also, the group recommended that the cattle allotments listed in table 3-28 (same page and document) not be converted to sheep allotments without coordination with the CDOW. We continue to think these are sound recommendations. These recommendations will still leave many bighorn sheep in jeopardy of contact from domestic sheep, but this is a compromise reached to protect the best domestic sheep grazing allotments while protecting bighorn sheep in a few areas of the WRNF where domestic sheep are currently not grazed. These recommendations also allow for some vacant domestic sheep allotments to remain open in case there is a need in the future due to drought or an upturn in the industry.

5.45 Forest Carnivores

The desired condition discusses the need for dense regeneration of conifer forest types, which provide habitat for snowshoe hares eaten by lynx. This may be the most limited habitat condition for lynx in Colorado and, thus, the most badly needed. Some of the worst coniferous habitat types for snowshoe hare and lynx could be the lodgepole pine forests. The WRNF plan states that the forest currently has about 2% of the lodgepole pine in the 1-20 year age class while in 1887, 24% of the forest was in this structural stage. Lodgepole pine ?orests may have the highest potential to produce high densities of snowshoe hare for lynx and other forest carnivores and raptors. However, when these forests mature, they shade out the understory and become almost biological deserts, providing habitat only for red squirrels or hiding cover for big game such as elk. While there is also a need to preserve some mature lodgepole pine, present conditions are outside the historic range of variability (HRV). From an ecological standpoint, it appears the WRNF needs to treat significantly more lodgepole pine forests to obtain a younger 1-

In construction of new ski facilities, therefore, it is vital that these impacts be mitigated to avoid any net loss of wildlife habitat. New construction, for example, requires clearing of corridors for aerial transportation. Such clearing results in at least a temporary loss of habitat, increased fragmentation of interior species, and can favor undesirable species (i.e. cowbirds) that compete with native species. The need to maintain such corridors for maintenance, repair and rescue operations is an ongoing habitat concern. Once a corridor is cut, recreation activities follow both summer and winter. The need for access in winter to repair equipment and rescue people if the aerial transportation becomes disabled requires ongoing packing of the snow to facilitate access in critical times. This snow packing can increase the negative impact from the corridors, not just to big game but to small mammals and spring green-up times from snow compaction. Studies in Canada have documented the delay in green-up and reduced biomass in the spring due to snow compaction. This can adversely impact wildlife as spring green-up is a critical period. Reduction in bio-mass can impact birth weights and early reproduction success for small mammals.

The Draft Environment Impact Statement (pg. 3-197) provides a discussion on connectivity; the discussion includes four areas of concern. The concern is the loss of connectivity for wildlife to be able to freely migrate between habitats. Three of these areas are possible sites for aerial transportation corridors. If such aerial corridors are to be added, the adverse impacts on wildlife would have to be mitigated.

Ski Areas

In the Draft Environment Impact Statement on page 3-348, the section on higher skier density surmises that skiers expect solitude in a ski area. It further states that increased density will reduce the chance for adventure, and that more crowding would require more intensive clearing of trees. The result, according to the section, is increased fragmentation and greater impact to wildlife. This is a serious misunderstanding of the impact of skiing on wildlife, and is not supported by facts. On the contrary, greater density at existing areas would have far less impacts on wildlife than a new ski area, or expansion into undeveloped terrain.

In reviewing the bird study done at Vail and other ski areas by Rick Thompson of Western Ecosystems Inc., the current level of clearing has already created so much fragmentation that habitat for mature forest species is lacking in those areas. A principal rule in wildlife protection is that impacts should be concentrated rather than dispersed. The document does not provide data on the impact from opening resorts to night skiing as a method of increasing the skier capacity and decrease crowding without additional terrain. This would have less impact to wildlife in most cases than development of new areas. The assumption that skiers seek solitude is not supported by empirical evidence, so expansion decisions that could further fragment habitat should not be based on that assumption.

Travel Management

W2311

When the Plan discusses summer and winter travel management, are there definitions that define what is "*winter*" or "*summer*"? There should be dates (i.e. winter=12/1-4/30 and summer=5/1-11/30).

The requirement in Alternatives C and D that mechanized and motorized users remain on designated trails or roads will provide the greatest improvement of habitat values for terrestrial wildlife and reduce sedimentation in aquatic habitats.

Winter travel management, under any alternative, should minimize impacts on wildlife. The proposed winter travel management plan restricts snow machines to designated trails across areas managed for deer and/or elk winter range (Management Prescription 5.41) while allowing unrestricted winter use at higher elevations not used by big game in the winter. Winter vehicle use should be minimized in Management Prescriptions 5.41 (Deer/Elk Winter Range) and avoided in Management Prescription 5.42 (Bighorn Sheep Habitat).

Standards & Guidelines

Alternative D prescribes an emphasis on biodiversity, but for most wildlife-oriented management area prescriptions, few wildlife standards are included. Wildlife techniques or thresholds are usually guidelines, not standards. The thresholds should be standards in wildlife management areas.

- Water and Aquatic Resources: Standard # 1 requires maintenance of a minimum of 70% of potential aquatic habitat. Standards #2 and #3 talk about protecting a stream from impacts from harmful runoff. This suggests leaving buffer strips along the riparian zone on both sides of a stream. This is a good idea, but if that is what these standards are about then it should be stated that way. The widths of riparian zones vary greatly from stream to stream and even between different reaches of the same stream, so it would be difficult to apply a specific buffer zone width for all streams. A standard should be adopted that states an undisturbed buffer zone will be left along both sides of all streams and that the width of this zone will be evaluated on a case by case basis. In incised channels where riparian zones are very narrow, a buffer zone may need to be wider than the riparian zone to protect a stream from harmful runoff.

- Management Area 5.4, Forested flora and fauna habitats, page 3-58. There are no wildlife standards and only one guideline that deals with native fish. If standards for flora and fauna do not differ between this prescription and the others, why have it? This was the apparent logic behind the phase-out of the old 4B "Management Indicator Species" prescription in the first generation of forest plans: no one could figure out what to do differently there than in other prescriptions. Perhaps standards should be developed that give priority to species that are more limited in their habitat requirements.

- Management Area 5.41 Deer and Elk winter range, page 3-60. The first guideline for wildlife is rather ambiguous and needs to be strengthened and clarified. An example

of a specific particular standard could be something like, "Travel is restricted to designated roads and trails during the period xx/xx to xx/xx."

- Management Area 5.43 Elk habitat, page 3-65. The dates under the second wildlife guideline need to be redone: (Might also use WRIS dates).
  Calving----------May 15 to July 1
  Migration--fall-------November 15 to December 30
  Migration--spring-----April 1 to June 1
  Winter----------OK as given
  Summer----------OK as given

  Standards should be developed for this Management Area, and the Division of Wildlife would work with the USFS to do so.

- Management Area 5.45 Forest Carnivores, page 3-67 & 3-68. There are no wildlife Standards or Guidelines in what is clearly a management area set aside for wildlife.

- Proposed, threatened, endangered and sensitive spp., pg. 2-15 Guidelines #5, #13, #14- should become standards. Wildlife, page 2-18, 2-19, Guideline #1 should be a standard.

- Code 1.13, page 3-8 & 3-8 Semi-primitive wilderness, Guideline #4, would restrict hunting access and restrict the opportunity to harvest big game within wilderness areas. This could make wildlife management much more difficult.

- Code 5.4, page 3-57 and 3-58, there are no guidelines or standards for terrestrial wildlife. There should be standards for minimum-security habitat and road density.

- Guideline for Wildlife, page 3-60, #1 & #2 should be standards. Guideline for Recreation, page 3-60, #1 should be a standard. Guideline for Special Uses page 3-61 #1 should be a standard. We suggest a standard under wildlife that allows for the closure of winter range and lambing areas where needed, in consultation with the Division of Wildlife.

- Code 5.43, page 3-64 & 3-65, wildlife Guidelines #1 and #2 should be standards. Dates for elk calving should be changed to May 1 to July 1; winter dates should be changed to December 1 to May 1. Infrastructure Guideline #1 should be a standard.

- Code 5.45, Page 3-66 to 3-68, recreation Guidelines #1 and #2 should be standards. Infrastructure Guideline #1 should be changed to a standard.

- Code 8.31 page 3-80, Desired condition, last sentence should be changed to read, Operation plans for aerial transportation systems **will** be compatible with the management areas they cross. Standards for wildlife could be added to this section, with CDOW consultation.

W2311

Corrections:

Page 3-202 & 203, Figure 3-14 and Table 3-55 uses the HEI model to evaluate elk habitat effectiveness. We question too much reliance on the HEI model. The model has not been updated and lacks the most current information on impacts from recreation. Also, the model was developed before the current methods of recreation were in existence. The model may provide some guidance, but it is not worthy of total faith.

Page 3-203, has the wrong RVD's numbers, and the dollar figures should be checked.

Page 3-205,Draft EIS, Big Game RVD's, the report states that RVD's were 257,000 for the White River. In adding up the information from Table 3-57, the total is 367,424 RVD's (E15 RVD are wrong -- it should be 23,765). This is just for elk. Deer RVD for deer hunting in the White River total 206,003. This brings the total RVD for only deer and elk (not counting sheep, goat, bear, lion, moose, small game, and waterfowl) to **573,427**, which are double the reported figures in the document. All figures are from the CDOW 1997 big game harvest.

Page 3-210 Table 3-53 acres dedicated for elk management -- the Standards and Guidelines for 5.4 should not be considered to favor elk. Terrestrial wildlife is not even mentioned in the Standards and Guidelines. Including this as a prescription that favors elk is incorrect.

Page 3-484, Table 3-158 & page 45 in the Summary of the DEIS; Jobs related to wildlife are shown as 45, a clear underestimate. There are more than 45 employees with the CDOW within the White River National Forest. There are more than 45 fishing guides in Eagle County. This number should be corrected to more accurately reflect the importance of wildlife to the economy.

Page 24 Summary of the DEIS, next to the last paragraph, states the largest number of RVD's is expected in Alternative F, then E, B, C, D. The season dates, cost of licenses, limited permits, and success rates are going to impact the RVD's more than the Alternative chosen. Increased roads do not always improve hunting. In fact, too many roads can result in hunter crowding, elk moving to private lands, and a poor quality experience.

Appendix N

Page 124, Boreal Owl: Distribution -- the Boreal Owl was located in CAT III and in Northeast Bowl by Rick Thompson and Dr. Bill Alldredge. The calls from Boreal Owls have been reported in the Red Sandstone area and in the upper Homestake Drainage.

Page 155, White-faced Ibis: Distribution -- In the early 1980's, White-faced Ibis were seen several times at the Minturn horse pasture in the spring. Three White-faced Ibis were seen in Camp Hale on April 20, 1999, and 52 White-faced Ibis were seen on May 7, 1999 in Lake Creek, 1 mile from the USFS boundary.

Page 190, Boreal Toads; Distribution -- the status of the breeding population in the East Lake Creek area is active, and the breeding population in the Holy Cross City area has been inactive for at least the last year.

Specific Comments By Ranger District

Aspen Ranger District

1. Trail 1959.1 – ends up at Connie Harvey's at Johnny Draw (T9S, R86W, Sec. 33). There is no through access.
2. Trail 1962.1N – there is no legal access with Child, only a verbal agreement with Child for access up past the Sharp cabin.
3. Roads up at Koby Park need to be looked at. We estimate that approximately 75% of roads shown have already been closed and revegetated by the USFS. Some roads show closed which should be open during hunting seasons. Please see attached map.
4. Add or note bighorn sheep range at the Iron Mine – Pearl Pass area. Consider 5.42 management prescription to overlap with Gunnison National Forest.

Blanco Ranger District

The Blanco Ranger District of the White River National Forest produces wildlife and wildlife related recreation values of statewide importance. The Blanco District is considerably different in land use and the importance of wildlife than other ranger districts within the forest. These comments may not apply equally to other ranger districts. The Blanco District, including the Flattops Wilderness, provides calving, summer, and some winter range for the largest elk herd in Colorado, estimated at approximately 43,000 animals. The District also provides important summer range and some winter range for the Piceance Basin and other mule deer herds. The Piceance Basin deer herd has historically been the largest migratory deer herd in the world. Bighorn sheep occupy the South Fork drainage throughout the year. The District also provides habitat for an untold wealth of nongame species of mammals, birds, amphibians and fish.

W2311

Boreal toads, listed under the Endangered Species Act, are found in the Flattops Wilderness and elsewhere on the forest. Colorado River cutthroat trout, recently petitioned for listing, occur in many headwater streams on the District. Stocked trout of other species provide angling opportunities in many other lakes and streams within the District. In short, the Blanco District provides important and often critical habitat for a wide variety of wildlife, including several economically important species and several threatened or endangered species.

This wildlife is a cornerstone of the economy of the White River valley, including the town of Meeker. Elk and deer hunting on the Blanco District and on surrounding private lands provides a major portion of the annual income for many private landowners, outfitters and guides, and local merchants. The summer and, to some extent, winter habitats provided by the Blanco District are fundamentally important to the maintenance of this economy and the herds of big game on which it is built.

Some of the prescriptions included in Alternative D would be beneficial for wildlife of many species. That alternative represents a significant improvement in management of wildlife habitats for a variety of species when compared to the existing management program (Alternative B). Under Alternative D, much of the upper White River drainage would be managed to enhance wildlife habitat. Important benefits of this alternative would be:

1. Expansion of the amount of deer and elk winter range protected;
2. Increased protection of important elk calving and other seasonal elk ranges in the Lost Park area;
3. Increased focus on management of bighorn sheep range in the South Fork drainage, and
4. Continued attention to Colorado River cutthroat trout management. The Upper White River and adjacent Williams Fork of the Yampa (Routt N. F.) contain the largest concentration of Colorado River cutthroat trout "A strain" streams in northwestern Colorado.

Alternative D also provides for different management of habitat for many other species of wildlife. It could lead to improved riparian conditions in many streams to the benefit of fish, amphibians, and other wildlife. Alternative D recognizes the importance of providing all age classes of vegetation, including mature, "old growth", and new forests, for wildlife habitat.

CDOW Priority Issues:

1. **Travel Management:** Aggressively maintain motorized vehicle restrictions to minimize elk movements to refuge areas and private lands to facilitate harvest and reduce game damage conflicts. Restrict motorized vehicles to designated roads across the Ranger District.

2. **Maintain Lost Park Elk Habitat focus and Coordinated Resource Management (CRM).**
3. **Continue To Improve Colorado River Cutthroat Trout** habitat and population performance to prevent or preclude listing under the Endangered Species Act.
4. **Close Park Creek Allotment** and manage for bighorn sheep habitat.
5. **Manage Bar HL Park/Coulter Mesa** timber cuts to be neutral or beneficial to wildlife.
6. **Manage Wilson Park Timber Cuts** to be neutral or beneficial to wildlife.
7. **Enforce and re-evaluate outfitter camp spacing.**

1. **Travel Management:** One of the most important components of wildlife management under any alternative is to move from open motorized and mechanized travel classifications to a restriction of both vehicle types to designated trails. DNR and DOW support this change in motorized vehicle regulation across the Blanco District.

- Many temporary roads have been created pursuant to logging activities on Bar HL Mesa south of the White River. Although these roads were officially closed after the completion of logging, the open designation of the surrounding land made the closures impossible to enforce. The result has been a proliferation of new roads that were never intended for public use.
- CDOW radio telemetry studies have shown an accelerated rate of elk movement off the forest onto adjacent private lands since 1992. This movement occurs early in the fall as hunting and other recreational traffic increases. Much of this increased traffic is ATV and other off-road vehicle use. The early movement of elk caused by this traffic has greatly reduced public hunting success on public lands, resulting in a growing elk herd that is becoming increasingly difficult to control. Elk move early onto private lands and then tend to stay after the hunting seasons, increasing conflicts between private landowners and elk. These problems occur both north and south of the White River, but are particularly troublesome on the north side.
- Setting road densities based on wildlife habitat could help increase management flexibility and minimize road conflicts with wildlife and wildlife habitat.
- In short, natural resource management has reached a point in some areas where the old "drive anywhere" rules are unrealistic. ATV's and other vehicles can be widely used while reducing the impacts of those vehicles on other users and on the forest's resources by restricting them to designated roads. Fall seasonal motorized road closures, where appropriate, can be used to have the greatest effect on early elk movements. CDOW recommends that CDOW and USFS personnel meet to make joint recommendations on the specifics of road openings and closings on the Blanco District. CDOW would prefer to have some flexibility in road opening and closing as conditions change through the life of the forest plan, rather than having all individual road closures stipulated in the plan.

2. Maintain Lost Park Elk Habitat focus and Coordinated Resource Management (CRM). CDOW has a long-standing investment in elk habitat management in Lost Park and has actively participated in Coordinated Resource Management efforts involving Lost Park. Oak Ridge State Wildlife Area is a part of this effort; the Lost Park

W2311

permittee's cattle graze on Oak Ridge in late spring/early summer in order to allow grass to re-grow after heavy use by elk in the calving season. Lost Park provides very important calving habitat. CDOW feels strongly that the management focus on elk habitat and the CRM effort should remain in place regardless of the alternative selected.

3. Continue To Improve Colorado River Cutthroat Trout Habitat. Lost Creek and Hahn Creek in Lost Park are home to one of the few "A-strain" Colorado River cutthroat trout populations in the White River basin. Riparian conditions deteriorated prior to the start of the CRM process, but has recovered sufficiently since the Cooperative Management Plan was implemented to maintain the fishery. This progress needs to continue to ensure the long-term viability of this cutthroat trout fishery. This population will be key in the analysis of whether Colorado River cutthroat trout should be listed under the Endangered Species Act in Colorado.

4. Close Park Creek Allotment: CDOW strongly supports the permanent closure of the Park Creek Grazing Allotment (Vacant Allotment 10) in the Blanco Ranger District. This sheep and goat allotment contains much of the annual range of the South Fork bighorn sheep herd. Domestic sheep within 5 miles of a herd of bighorn sheep have been shown to be detrimental to the long-term survival of bighorn sheep. Closure of this allotment would also preserve important bighorn forage in Park Creek, Lost Solar Creek and on the Bloomfield Bench, an area of significant bighorn concentration. This allotment has not been used for many years, as it involves long trailing across neighboring allotments and other livestock management problems. It is recommended for closure in 4 of the 6 alternatives. CDOW also recommends that all other allotments within five miles of the range of the South Fork bighorn sheep population, remain in cattle production and not be allowed to change class of use to domestic sheep.

5. Timber Management, Bar HL Park/Coulter Mesa: There has been an extensive aspen clear cutting program between Meeker and Rifle. The actual size of these cuts and the quantity of the cutting units are much greater than originally proposed. Recent (1999) examination of three to five year old cuts clearly show a lack of suckering or aspen regeneration except near the cut borders of old growth trees. We need to know if cattle/elk grazing is the cause or for what other reason the desired regeneration goals are not being reached. We recommend comprehensive studies to determine the causes and solutions. CDOW is having difficulty maintaining elk and deer on the forest through the fall months. The lack of heavy aspen regeneration could promote more big game migration on to private lands, causing reduced harvest and a growing game damage problem on private lands.

6. Manage Wilson Park Timber Cuts to be neutral or beneficial to wildlife: Impacts to wildlife resulting from the size, location, and timing of timber management actions should be considered and minimized in the Wilson Park area.

7. Outfitters: CDOW has received numerous complaints from hunters in recent years concerning the number and density of outfitters operating on the forest. Location of outfitter camps in preferred sites has also been a concern. Complaints have come from

both north and south of the White River but have been far more numerous south of the river. While outfitters provide a valuable service on forest lands, they are often in direct competition with other public users. CDOW recommends that the USFS enforce spatial separations between outfitter camps and evaluate expanding the distance between camps from ½ mile to ¾ mile, at least in sensitive locations.

Dillon Ranger District

SUMMIT COUNTY-WIDE COMMENTS

WINTER RANGE

One of the most critical components of habitat for deer and elk is winter range. This is especially true in the high elevations of Summit County. It is very important that these areas continue to be a high priority for protection. In addition, some winter range contains valuable sage grouse habitat that is also protected by protecting deer and elk winter range. Any alternative or combination of alternatives selected should recognize these important areas and protect them to the highest degree possible.

MIGRATION, MOVEMENT CORRIDORS

In areas where known movement corridors or migrations routes exist for various species of wildlife, a high priority must be placed on maintaining the effectiveness of the routes across drainages, highways, and other obstacles. Diminishing the function of the corridors should be avoided.

WATER QUALITY

Water quality is a major concern in Summit County. Summit County contains the headwaters of the Blue River, which leads to the Colorado River. Portions of the Blue River have been designated as Gold Medal Water, with high economic, biological, aesthetic, and social value to the community. Dillon Reservoir and Green Mountain Reservoir are also along the Blue River and provide drinking water and recreation for thousands of people each year. Thus, it is critical that management practices strive to maintain high water quality in the Dillon Ranger District.

VEGETATION MANAGEMENT

In Summit County several issues need to be considered carefully if an aggressive timber management policy is in place. First, as mentioned above, water quality should be addressed in any timber management activity. Second, local, state, and federal agencies have made significant progress in protecting wetland and riparian areas, and that progress should be continued. Third, timber management should continue to be used for habitat improvement for multiple species. While elk will be one of the primary beneficiaries, other species should benefit as well. Finally, large stands of mature lodgepole pine exist in the county that need to be converted from large, decadent stands which provide little habitat for few species to more diverse age stands of lodgepole pine, aspen, willow, and other conifer trees to increase populations and diversity of species of wildlife. The selection of sites needs to be carefully scrutinized by the USFS, state and federal agencies, and local governments.

W2311

LOWER BLUE BASIN (roughly the area north of Interstate 70)

The Lower Blue Basin extends from an elevation of about 8,000 feet to about 13,000 feet. This is about 1,000 feet lower than any other basin in Summit County. The lower elevation allows for marked differences in vegetation and therefore, diverse wildlife habitats. The Lower Blue Basin supports the largest and most diverse populations of wildlife in Summit County. The Forest Service has protected much of the Lower Blue through two wilderness areas (the Eagles Nest and Ptarmigan Wilderness Areas). These wilderness areas protect a large portion of the basin, so there are fewer issues concerning management of Forest Service lands than in other parts of the county. These comments focus on the Forest Service lands outside the wilderness boundaries. The Lower Blue Basin also has the largest undeveloped tracts of private property in Summit County, the development of which may someday impact Forest Service lands. Summit County and the Lower Blue Planning Commission have been working toward preserving the rural characteristics of the Lower Blue and minimizing impacts to wildlife habitats on public and private property. These efforts need to be supported and continued by state and federal agencies.

LAND MANAGEMENT PRESCRIPTIONS

- The area west of Green Mountain Reservoir is designated as 5.4 and 5.45. The 5.4 area designation should be extended further south to allow for a road system that was created as part of a joint effort between the local Ranger District, the BLM, and the DOW. This system has been working to protect wildlife and wildlife habitat, and the 5.45 designation would provide a buffer between the wilderness area and the motorized area. The area west of Sheep Mountain is not in the Dillon Ranger District or Summit County, but is in Bob Thompson's district.
- The area at the top of the Williams Peak range is currently 5.4 under Alternative D, but because of elk and deer use in the area it would be more appropriate to be designated 5.43 or 5.41.
- On the west side of the Blue River, much of the previously prescribed land (under Alternative B) between Boulder Creek and Cataract Creek was 5.41 and under Alternative D would be converted to 5.43. The DOW has worked with private landowners and the Forest Service in the area to protect and enhance the area for wintering elk. The 5.41 designation is the more appropriate prescription for the area.
- A travel management prescription on Brush Creek has been changed to allow motorized travel year round, including snowmobiles in the winter. The area is poor for snowmobiling since routes lead to dead ends that lead to the wilderness or to private land (the small National Forest area is surrounded by private land and wilderness). Containing snowmobilers to designated routes in the area may be difficult. The area also provides important winter range for elk, so recreational management should consider and mitigate that impact.
- The area south of Wildernest and Mesa Cortina contains unique wildlife habitats for many species. Over the years, the area has also developed many social hiking and

biking trails. A cooperative effort has been initiated between the Ranger District, the county, the DOW, and local interest groups. This effort should be allowed to continue to develop appropriate trails that provide recreation while protecting the wildlife and wildlife habitat.

UPPER BLUE BASIN (roughly the area south of Dillon Reservoir, the east half of the Ten Mile Range to the Continental Divide)

The Division of Wildlife has been conducting a study of radio-collared elk in the area north of Breckenridge between U.S. Highway 6 and Tiger Road. This study has shown that elk are using these areas extensively during most of the year. These areas are critical for several reasons including calving, winter range, and regular movement and seasonal migration corridors. The management prescriptions allow for a number of recreational activities while maintaining the emphasis on elk management.

LAND MANAGEMENT PRESCRIPTIONS

- The area near Georgia Pass should be included in the 5.45 designation, since much of the private land was traded to provide such protection. Studies by the Forest Service, the USFWS, and the Division have shown the pass to be especially important for elk and a variety of other species in the area.
- The area between Ophir Mountain and the Whatley Ranch is used extensively by elk wintering in the area and would be best protected by the 5.41 prescription.

SNAKE RIVER BASIN (roughly the area south of Interstate 70, east of Dillon, and north of Tiger Road)

The major issues in this basin center around the geographic and vegetative characteristics that provide movement for a wide variety of species to move north and south on the east side of Keystone. This corridor has been reduced by the development that has occurred from Dillon Reservoir to Jones Gulch. The DOW, the Forest Service, Summit County, and the Fish and Wildlife Service have been trying to assess the importance of the corridor in relation to lynx, elk, deer, black bear, moose, and other species. Thus far, the consensus has been that this corridor is important and should be preserved. The agencies are currently trying to determine what activity and development is appropriate in the corridor, and have not yet reached any conclusions. The corridor should be managed very conservatively until definitive information is gathered.

LAND MANAGEMENT PRESCRIPTIONS

- The 3.55 prescription may be appropriate east and south of Keystone, but the 5.45 prescription might be more appropriate.
- The Tenderfoot Mountain area is currently designated 5.43 and 5.45. If snowmobile recreation is managed carefully and roads appropriately managed, the 5.43 prescription may be substituted for the 5.45 prescription. The more appropriate prescription for lower Tenderfoot Mountain is 5.41 because of the critical nature of the winter range in the area and in the Soda Creek drainage (the area above Summit Cove). The other areas outside of the 5.41 designation in the Swan Mountain area are consistent in management with a prescription of 5.43.

W2311

- The Montezuma area is currently 4.32, but is surrounded by prescriptions such as 3.21 and 5.45, which indicate a low level of impacts. The 4.3 prescription would be more appropriate in this area (rather than 4.32).

TEN MILE BASIN (roughly the area south of Frisco, west of the top of the Ten Mile range to the county line)

This area contains two important movement corridors that allow wildlife to move north and south across I-70. The bridges that cross the drainages on the east side of Vail Pass provide the best opportunity for wildlife to cross the interstate safely. The area is used heavily by elk, deer, and various carnivores, and could become potential habitat for dispersing and settled lynx.

LAND MANAGEMENT PRESCRIPTIONS

- The top of Vail Pass is currently a special fee area in the winter for snowmobiles. Much work has gone into developing the site for this type of recreation. The site attracts high numbers of users and concentrates them in one area. The area is not without its problems, though. Containing snowmobiles continues to be an issue, but if the top of Vail Pass were prescribed as 5.43 or 5.4 with designated routes and play areas, the rest of the area currently prescribed 5.45 (between Copper Mountain and Vail Pass) could function effectively for forest carnivores, elk and mule deer. Part of the solution may be limiting the number of users, perhaps through parking lot size, to limit the number of snowmobiles in the area.
- The area between Climax and Copper Mountain is currently designated as 4.3. This area is near timberline, and provides forest connectivity between Camp Hale and the Ten-Mile Range. The 5.43 or 5.45 prescription would better protect the area for ungulates and forest carnivores.

Eagle Ranger District

Travel Management

WINTER TRAVEL

- The DOW recommends closing utility corridors to the south and west of Gypsum Creek. These corridors contain deer and elk winter range and do not go anywhere except into other closed areas.
- We recommend opening the area to motorized winter use in the Metheny Park, Bumpity Park, Big Park, and Granite Springs. These areas have no wildlife conflicts and contain some very good powder meadows the snowmobilers really like. If nothing else open designated routes so the sleds can get to these important play areas. If areas like these are not available to snowmobilers, they will go to other areas where there will be true conflicts with wildlife.
- We also recommend opening a designated route for winter motorized vehicles on the main Hardscrabble Road from Wolverton Spring to the road going over the top of Hardscrabble and connecting with the powerline road connecting Gypsum Creek and

Brush Creek. Without this designated route snowmobilers will be restricted from coming onto the forest and will stay on the lower elevation BLM lands where there will be significant impacts to wintering wildlife.

SUMMER TRAVEL

- The Season of Restriction dates used in the management strategies does not provide good dates for elk calving areas. Those dates should be May 1 to July 1.

ROADS--

FDR 414.1 Change travel management strategy to **1**
FDR 417.1 Change travel management strategy to **1**
FDR 421.1F Change travel management strategy to **1**
FDR 428.1 Change travel management strategy to **1,17** and with an elk calving season of restriction May 1-July 1
FDR 430.1B Change travel management strategy to **1** and with an elk calving season of restriction May 1-July 1
FDR 430.1C Change travel management strategy to **1** and with an elk calving season of restriction May 1-July 1
FDR 430.1D Change travel management strategy to **17**
FDR 430.1E Change travel management strategy to **1,17** and with an elk calving season of restriction May 1-July 1
FDR 431.1 Change travel management strategy to **1**
FDR 431.1L Change travel management strategy to **1**
FDR 432.1 Change travel management strategy to **1**
FDR 433.1 Change travel management strategy to **1** and with an elk calving season of restriction May 1-July 1
FDR 435.1 Keep a **1** but close below Lettuce Patch Spring
FDR 435.1C Change travel management strategy to **1** and close at west end of Metheny Park where it's closed presently
FDR 451.1 Change travel management strategy to **1**
FDR 451.1A Change travel management strategy to **1**
FDR 455.1 Change travel management strategy to **1**
FDR 464.2 Change travel management strategy to **1**
FDR 514.2 Change travel management strategy to **1**

WAYS--- Open one of the following two Ways as they parallel each other and change the travel management strategy to a **17**.
WAY 464W.2N
WAY 464W.3

W2311

MANAGEMENT PRESCRIPTIONS (see map)

- Gypsum Creek. 5.45, Forest Carnivore, area should be expanded to go to the top of the Red Tables. The present area is too small with no real linkage to other 5.45 areas. This same area should be expanded to the southeast where it is currently a 5.4. The present area between the existing 5.45 area and the utility corridor to the east should also be expanded to a 5.45 classification.
- The small areas on the west and north sides of Adam Mtn. should be reclassified to a 5.45 or a 5.41. The current classification is for areas that are important wildlife habitat for deer and elk (production, breeding, rearing, wintering and movement).
- The 5.45 area on Hardscrabble Mountain ranging from the forest boundary to the southeast should be changed to a 5.43. The present area designation is to small without any linkage to other 5.45 areas and does not really have the physical attributes the other 5.45 areas do.
- We support plans to address the bighorn sheep habitat areas. Most areas seem accurate. However, the bighorn habitat prescription north of Deep Creek Canyon should extend further upstream to include the rim and adjacent habitat up to Sam's Spring. Alternative D does not adequately map the deer and elk winter range north of Glenwood Canyon. The map in Alternative B seems to be more accurate, especially on the west end of the canyon.

On a smaller geographic basis, the area of the White River incorporated in the Eagle North district, there are a few issues that are not addressed in Alternative D. There are three motorized routes that access the forest in this area. All three routes are "4-wheel drive" accessible only. These routes do not have spur roads and reach singular destinations. All three are heavily utilized during the hunting season and for summer recreation. Closing these roads might have come benefits to wildlife, but would have an adverse impact on customers that rely on motorized access to reach their hunting destinations. We recommend that USFS roads 613 and 616 both accesses to South Derby Creek, 610 and 612 Stump Park and Middle Derby Creek access, and 615 Sunnyside access remain open. Although there are only three accesses into the forest , road 616 and 612 are spurs off main access roads 610 and 613 and do allow dispersal of hunting/human pressure. These roads have undergone discussion and public comment for closure prior to this forest plan and comments were greatly in favor of the roads remaining open to motorized access.

The greatest impact we see in this area is the huge increase in numbers of summer recreation users in the wilderness area. This has caused a change in movement patterns and areas of use by wildlife. Traditional calving areas have been deserted because of a loss of solitude, elk are now spending a majority of the year on private property adjacent to the forest because there is less impact from humans, and movement patterns and migration times have been effected. Closing the roads that we have suggested remain open would have an impact on the amount of summer, use but there has been a dramatic increase in horse and backpack use into former "solitude" areas. This is a greater impact on wildlife than those roads. Road closures could decrease the amount of a certain kind of use, but the majority of motorized users do not venture far off the road, limiting their impact. There is also an increase in the amount of summer outfitting in the area. We

think a use permit system in many areas of the forest should be considered, as should seasonal closures of critical wildlife areas.

Rifle Ranger District

TRAVEL MANAGEMENT

Winter Travel Management – Maps need revision, as not all routes are marked, and SP routes are not all designated

Road 2160.4 (Beaver Creek Road unit 42) shows on the travel management map but not in the Road and Trail listing Appendix O. This has been an historically important access to the National Forest. Its omission from the database needs to be resolved.

Road 845.2 (Spruce Cr. Rd) shows on the travel map but not in the Road and Trail listing in Appendix O. Its omission from the database also needs to be resolved

Trails 1902.1 and 2160.6 should not have code 69 (page O-46 and O-47) applied to them, because this would preclude hiking and horseback on this trail. These are uses that are presently occurring and should not be precluded. A restriction on foot and horseback use of the trails would negatively impact hunter success and GMU 42 harvest objectives.

TIMBER SUITABILITY

Comments above regarding Bar HL/Coulter under the Rio Blanco District also apply here.

MANAGEMENT PRESCRIPTIONS

- Removal of Management area prescription 8.25 will benefit wildlife both on private and public lands.
- The inclusion of the west half of the Battlements into a Research Natural Area, prescription 2.2, is supported by DOW as one way of protecting of this unique ecosystem and the biological diversity of the area including the endemic Bighorn sheep population (page D-40).
- The inclusion of prescription 1.31 to the upper part of the Battlements could help maintain summer solitude, disperses hunting pressure, and provide a benefit to the established outfitters on the Forest.
- Prescription 3.31 highlights the access work that was cooperatively accomplished by the Rifle District and the DOW to provide access to the Battlement reservoirs and ultimately in securing funding (from "Fishing is Fun" program) to restore the cutthroat trout fisheries in the reservoirs.

W2311

- Prescriptions 5.41 and 5.43 would help manage deer and elk in this half GMU 42. Those prescriptions would allow the continued cooperation with the Rocky Mountain Elk Foundation, USFS, private industry, and DOW to actively manage the forest for the benefit of both people and wildlife.
- The DOW supports the closure of Cattle and Sheep Allotment 40 to support the RNA prescription and to protect the endemic Bighorn population.

Holy Cross District

TRAVEL MANAGEMENT

Winter:

These recommendations pertain to all proposed alternatives. The accompanying map provides additions and deletions for winter travel and snow play areas. The numbers correspond to the numbers on the map.

- The area within the roads across Red and White Mountains should be listed as G. There should be little wildlife impact from recreation in this area during the winter. Big game species have moved down for the winter. It is these lower areas that require wildlife protection during winter recreational use.
- The Holy Cross City area should be shown as G. Again, big game species have moved down for the winter.
- Both of these areas may provide some suitable habitat for lynx and snowshoe hares but neither provides the optimum habitat. The surrounding areas that already have limited uses provide better habitat and movement corridors, so further limits to public access in these areas is not justified by those criteria.
- Ptarmigan Pass is one area that contains open alpine bowls. Due to deep snow and/or lack of cover, these bowls have limited wildlife values in the winter. This and other similar areas should be open for all forms of winter recreation
- The open meadow on the lower 2/3 thirds of Grouse Creek should be shown as G. Due to deep snow and/or lack of cover this open area has limited wildlife values in winter.
- The parcel south of Edwards should be listed as B, closed to motorized travel. There is no legal motorized access to this parcel now. It is listed as winter range for deer and elk, so these two prescriptions would be in conflict.

Summer:

Many hunters are concerned that they would not be able to have vehicular access to locations over McCord Pass to hunt drainages such as Bear Gulch, Grape Creek, Lava Creek, Box Canyon Creek, Aspen Creek and Castle Creek. These areas are accessed by USFS Roads 404, 442, 445 over McCord Pass from the Sheephorn drainage side. Also USFS Road 449 is accessed over the High Trail Gulch saddle from Cottonwood Mesa Springs Road to access the Castle Creek and High Trail Gulch basins. None of these roads would be open under Alternative D of the plan, but closing those roads would cause serious problems for wildlife management.

These roads are the only access by vehicle to the backside of Piney Ridge. Colorado is concerned that if those areas are closed to all vehicle access, there cannot be an adequate harvest in the elk herd in that area. The elk tend to bounce back and forth between the Sheephorn side and the Piney River side. DOW believes if all access to the Piney River side is closed, the elk will simply move from the Sheephorn side during hunting seasons and be untouchable to most of the hunting public. The herd cannot be properly maintained without that hunting access

These roads are extremely rugged and are only for the die-hard four wheelers or ATV'ers. This in itself limits many hunters from this area. DOW would prefer to keep these roads very primitive. This is not to say that there is no abuse now with users creating and using new ATV trails in the area. This needs to get more USFS law enforcement attention to help curb this problem.

Leaving these vehicular access routes open over Piney Ridge to the Piney River side will not be detrimental to the forest mammals, fish and avian species found in that area. In general, fewer roads in an area is preferred, for the benefit of wildlife. However, this occasionally needs to be balanced with access to allow for increased recreational opportunities for the public and to allow the DOW to maintain a burgeoning elk herd.

This chart is from Appendix O Pages O-30 to O-39, using Alternative D. However, the specifics for the roads and trails could be used in any alternative. The number beside the road/trail corresponds to the Travel Management Strategies as listed in Appendix O. Many of these roads and trails need to be cross-checked with the EIS and EA completed for the ski areas and other projects, which contain specific wildlife mitigation such as seasonal closures. These closures include foot and horse trails.

If seasonal closures are for wildlife purposes the road/trail should in fairness be closed to all users, not just some. Calving dates are May 1 to July 1, not May 1 to June 20. This applies to any Code that has a closure for elk calving. Closures to protect big game winter range should be comparable with the dates used in the DOW WRIS mapping. These dates change depending on the location and species. These dates should apply to any Code that has closures for protecting big game winter range.

Road/Trail #	Road/trail Name	Code	Comments
FDR 406.1	N/A	1	
FDR 702.1	Resolution	1	
FDR 703.1	Gold Park Campground	1	
FDR 707.1	Tigiwon	13	Change dates April 1 to July 1
FDR 708.1	McAllister Gulch	1	
FDR 711.5C	Back Bowls *		needs a seasonal closure to comply with CATIII EIS
FDR 711.5E	Sunup Bowl *		needs a seasonal closure to comply with CATIII EIS
FDR 738.1	Beaver Creek	51	
FDR 738.1A	Bottom Lift 10	51	
FDR 738.1B	Lift 9 mid-point	51	
FDR 738.1C	Beano	51	
FDR 738.2a	McCoy Park *		Seasonal closure May 1 to July 1 for elk calving
FDR 738.2B	McCoy Park Spur *		Seasonal closure May 1 to July 1 for elk calving
FDR 738.3A	Top Lift 7	51	
FDR 738.3B	Base Lift 8	51	
FDR 738.3D	Lift 9 mid-point	51	
FDR 739.1	Top Lift 8	51	
FDR 747.1	Wearyman	1	
FDR 748.1	Line Shack *		Closure needs to be from May 1 to July 1 for elk calving
FDR 749.1	Meadow Mtn *		Closure needs to be from May 1 to July 1 for elk calving
FDR 755.1	Ranch Creek	1	
FDR 759.1	Holy Cross City	1	
NRT 2005.1	Two Elk *		Needs to comply with CATIII mitigation May 5 to July 1 closure
Way 2133W.1	Commando Run *		Needs to comply with CATIII mitigation May 5 to July 1 closure
Way 2348W.1	Whiskey Creek*		Closure needs to be from May 1 to July 1 for elk calving
Way 2348W.1A	Whiskey Creek *		Closure needs to be from May 1 to July 1 for elk calving
Way 2349W.1	N/A *		Closure needs to be from May 1 to July 1 for elk calving
Way 2349W.1A	N/A *		Closure needs to be from May 1 to July 1 for elk calving

* Need to be checked against EIS or EA for wildlife mitigation.

MANAGEMENT PRESCRIPTION CHANGES

With the ever-increasing rate of private land development in the Upper Eagle Valley the protection of big game winter range on public lands is increasingly important. The USFS should protect the critical habitat under its jurisdiction to provide for the needs of this elk herd. With the continued decrease in agriculture lands, the USFS needs to provide for the maintenance and protection of big game winter range on public lands. Such actions would protect public values and assist private lands in preventing additional impacts to private agriculture lands. The Upper Eagle River elk herd is hampered by the inability to migrate from the area due to Interstate 70, by continued development, and by the shortage of agriculture lands for winter range off public lands.

In Alternative C, the area in Booth Creek provides two prescriptions for one area, 1.12 and 5.42. This is an excellent combination. The area is critical bighorn sheep habitat yet it is within the wilderness. This was a DOW recommendation in the scoping for several

areas. This type of resource planning allows for the best opportunities to meet the ever-increasing complex needs of the resource. The following areas should also have a combination prescription:

Booth Creek (mentioned above), the 5.42 prescription should be drawn the same as in Alternative D, with the combination prescription (1.12, 5.42) continuing to the east to Pitkin Creek.

Homestake Creek, west of the Homestake Road from Highway 24 to Missouri Lakes turn off. This should be 1.12 combined with 5.43. This area contains elk winter range, severe winter range, winter concentration area, calving, rearing and summer range. Two different herds use this area. In the winter and spring the Homestake herd winters there. In the summer and fall elk from Redcliff and Minturn area use the area. This area was studied for 6 years to develop the specifics of this movement pattern. With the increasing push for more recreational areas in the winter and spring, there needs to be a prescription that can protect such critical habitats.

McCoy Park: The are two parcels here that are currently shown as 5.4 and 5.41 in Alternative D. They should be changed to 5.43. CDOW and CSU have had elk studies in this area since 1985. The studies have shown the critical importance of this area for elk calving, rearing, summer range and transitional winter range. With the exception of one large private landowner in Lake Creek, all other private lands in this area (north and east) have been developed. All of the USFS land to the east has been developed as the Beaver Creek ski area. The USFS land to the south is wilderness that provides summer range but does not provide calving, winter range or transitional winter range. This herd migrates to the Grouse Mountain area in the summer. The increasing development and recreation pressure on the surrounding lands has only increased the value of this parcel to maintain a viable elk herd in the Lake Creek and Grouse Mountain area.

Stone Creek, Whiskey Creek, Dowd Jct. and Two Elk: These areas are currently shown on Alternative D as 5.41. They should be changed to 5.43. The Stone Creek and Whiskey Creek drainages are part of the mitigation for the Beaver Creek ski area. The mitigation plan clearly states that this area is to be managed for elk. The drainage contains calving, rearing, winter range, severe winter range, and winter concentration areas. The surrounding private lands are all developed. This development is putting additional stress on the USFS lands to provide recreation. Increased recreation during winter and spring would have adverse impact on managing the area for elk, as required to meet the Beaver Creek Ski Area Mitigation Plan. Elk studies since 1985 have documented that this herd migrates to Vail Pass (south of I-70) and to Grouse Mountain. Activities or developments that would negatively impact the habitat could have adverse impacts on the Upper Eagle River elk herd. Dowd Junction and Two Elk areas contain winter range, winter concentration areas, severe winter range, calving, and transitional winter range. Private land that is either developed or being considered for development surrounds this area. To the east is the Vail Ski Area and to the north is I-70. These two developments result in a blockage of migration opportunities for elk to winter elsewhere. The elk study since 1985 has shown this herd to migrate to Homestake Creek, Vail Pass (south of I-70) and Copper Mountain. Activities or developments that would negatively impact the habitat could have adverse impacts on the Upper Eagle River elk herd. These areas should be protected from activities or developments that would negatively impact or reduce the value of the habitat.

W2311

South of Redcliff to Camp Hale east of U.S. Highway 24: This area is currently shown as 5.4 in Alternative D; it should be changed to 5.41. This area contains elk winter range. To its north is a large piece of private land that has development potential. To the south is Camp Hale, a heavily used winter recreation area. This area provides winter range for a resident herd of elk. These elk winter and summer within the greater Camp Hale area. New activities or increased development could adversely impact this habitat and this resident herd.

South of Vail Pass, Searle Pass: This area is currently shown as 4.3 in Alternative D; it should be changed to 5.43. This area contains high quality summer range, calf-rearing habitat. The ongoing elk studies since 1985 have documented the drainages east and south of Vail Pass as critical calf rearing and summer range for elk. The elk using this area come from two different herds, Dowd Jct. and the Ten-Mile area. The recently completed final report of the Upper Eagle River Valley Elk Study documents the negative impacts on elk calf survival from uncontrolled recreation. A prescription of 4.3, dispersed recreation, could have significant adverse impact on the elk habitat. Maintenance and protection of these habitats are important, not only for calf rearing, but also for elk to bring optimum fat reserves with them to the winter ranges. The loss of optimum fat reserves would result in decreased winter body conditions. A reduction in winter body condition can result in decreased calf birth weight and decreased milk production by the cow. Such a reduction could result in decreased calf survival.

East of State Bridge: This area is currently shown as 5.4 in Alternative D; it should be changed to 5.41. This area contains elk winter range, severe winter range, winter concentration areas and deer winter range. The surrounding private lands already winter significant numbers of deer and elk. A loss of habitat value from increased activities or new development would likely result in an increase in the number of deer and elk wintering on the private lands. This area is mainly shrub and aspen drainages (prescription 5.41), not forested ecosystem. Additionally, the standards and guidelines do not mention terrestrial wildlife.

GRAZING:

For the Holy Cross District, there was an agreement signed by the DOW and Campbell Hansmire sheep on March 20, 1998. This agreement was given to Mr. Wayne Nelson, Range Land Management Specialist. The agreement outlined the adjustment of the sheep allotments in the Red and White Mountain allotment, north side of the Spring Creek and Berry Creek allotment (Spring Creek and Berry Creek are shown on the Forest Plan mapping as allotments 37 & 38). The north side of Spring Creek and the Berry Creek allotment would be added to the Red and White Mountain allotment (as shown on the map provided to Mr. Nelson). This would be used for spring grazing and fall egress. The east end of the Red and White Mountain allotment would be removed from the allotment and permanently closed to domestic sheep grazing (as shown on the map provided to Mr. Nelson). This agreement would provide an improved buffer between the domestic sheep allotment and the high priority bighorn sheep herd in the Gore Range.

Vacant Allotments:

These recommendations on vacant allotment closures are not from any one alternative; they would fit in any of the alternatives. The following vacant allotments should be entirely closed:

33 – Homestake S&G.
34 – Beaver Creek S&G.
36 – Tennessee Pass S&G.

The following allotment should have a portion of the allotment closed.

28 – East Lake Creek S&G: That portion within the wilderness area should be closed.

AERIAL TRANSPORTATION CORRIDORS:

The Summary of the Draft Environmental Impact Statement (pg. 31) discusses the use of aerial corridors to reduce miles driven and to lower automobile emissions, a laudable goal. From a wildlife perspective, such a plan must consider the existing mitigation plan for Beaver Creek. The mitigation plan for Beaver Creek required the protection of the area from Beaver Creek to Meadow Mountain, an area to be managed for elk, in which conflicts were to be resolved in favor of elk protection. Thus, any planned aerial transportation corridors would have to be developed in a manner consistent with that objective, in consultation with DOW. Any other issues related to air quality should be addressed in consultation with the Air Quality Control Commission and the Colorado Department of Public Health and Environment.

Sopris Ranger District

- On Avalanche Creek, there is currently a seasonal restriction for travel and a closure area for bighorn sheep management, which does not show on the map. The road is closed to motorized travel (except for administrative use) after the third rifle season and remains closed until May 1. There is a total closure on the north side of the road for the bighorn sheep management.
- Braderich Creek is an elk production area. The 3.32 designation should be moved west. Seasonal closure is a good idea.
- Babbish Gulch is also an elk and deer production area, even though it is within the ski area boundary.
- The map of Nettle Creek shows public access. There is no public access since the road crosses private land in the bottom. That road is also gated and locked.
- On Trail 1964/2, the Lilly Lake Trail, we believe there is no public easement across the Darien property.
- 2090.W – near Ski Sunlight – is shown as a way that is not open to the public, but that fact is unclear. It passes through an elk and deer production area and should be closed seasonally. There are already some seasonal closures for certain trails on Ski Sunlight due to these production areas.

W2311

- Keeping the Hay Park trail 1957 as a designated route and not allowing off trail use, as proposed, would be helpful to wildlife.

W2311

III. WATER ISSUES AND COMMENTS

General Comments

While it is clear that water quality and quantity are important to a healthy environment in national forests, the State of Colorado is deeply troubled by the inclusion in the White River National Forest Management Plan of a proposal to impose by-pass flows as a condition of permits. It is clear that this controversial and difficult proposal is contrary to state water law, but more importantly, unnecessary to the protection of the environment. We believe the State can help avoid this controversy through its own program to protect and preserve minimum stream flows. These comments are organized to address the bypass flow issue, forest management for water yield, and water supplies.

BYPASS FLOWS

The Forest Service has no statutory authority to impose bypass flows through forest plans. Under the National Forest Management Act, land use authorizations are subject to valid existing rights. 16 U.S.C. Section 1604(I) (1988). Moreover, Congress explicitly protected existing uses, and state jurisdiction over water when it enacted the Federal Land Policy Management Act (FLPMA). 43 U.S.C. Sections 1701-1784 (1988).[1]

The legislative history on this issue is clear: Congress did not intend for the national forests to operate in contradiction of existing water rights, development, water laws or compacts. Accordingly, all federal claims for water, even those asserted under the Clean Water Act, must comply with state water laws so that they are administered in priority with other water rights.

Thus, any pursuit of federal reserved rights or bypass flows is ill-founded and unnecessary. Inclusion in the final plan of such a requirement would force Colorado to defend its interests, its system of water law, and the rights of its citizens. Clearly, though, there is an easier way to resolve this important issue. The Colorado Legislature more than 25 years ago authorized the Colorado Water Conservation Board (CWCB) to file in priority and hold decrees for instream-flow and natural lake level water rights "to protect the environment to a reasonable degree." The CWCB has done so with enthusiasm and vigor. CWCB has protected over 1,100 miles of stream flows within the White River National Forest, along with over 21,000 acres feet of water in 138 natural lakes. Some have expressed concern about the extent of those filings in this forest, and about the willingness of the State to enforce those rights. These comments are intended to address those concerns and re-assure the Forest Service of the State's intent to continue protecting that important environment.

[1] Specifically, subsections 701(g) and (h) of Title VII of FLPMA provide that:
neither statute authorized the imposition of bypass flow requirements on existing or future water supply projects located on national forest lands for the purpose of attaining any of the secondary purposes of the forests, including the protection of aquatic habitat or fishery resources, or the general goal of ecosystem management.

W2311

Objective

The purpose of this analysis is to identify the instream flow (ISF) water rights and natural lake levels (NLL) appropriated, protected, acquired and monitored by the Colorado Water Conservation Board (CWCB) that are located within the boundaries of the proposed White River National Forest Land and Resource Management Plan. Please see attached map for a graphical representation of the ISF water rights and the National Forest boundaries.

Instream Flow Water Right Appropriations

The CWCB's ISF water right appropriations identified in this analysis were included if they are located within the boundary delineated in the White River National Forest Proposed Revised Land and Resource Management Plan. The White River National Forest revised plan includes five major drainages: the Blue River, the Roaring Fork River, the Eagle River, the White River and the Colorado River. A tabulation of these ISF water rights is found in Table 1. These are organized by watershed and include the case number, stream name, amount of flow, county(ies) and length in miles. It should be noted that the streams listed under Table 1 are located either entirely or partially within the management plan boundaries. The segments partially located in the management boundaries have been identified in Table 1. Below is a summary of the CWCB ISF water right appropriations within the boundaries of the management boundaries.

Summary of CWCB's Instream Flow Water Right Appropriations within the White River National Forest Management Boundaries

Watershed	Blue River	Eagle River	Roaring Fork River	White River	Colorado River	Total
Total Stream Miles	216	302	321	79	251	1169 Stream Miles
Total Number of Stream Segments	51	61	52	14	37	215 Stream Segments

Natural Lake Level Appropriations

The CWCB currently holds natural lake level (NLL) water rights for 486 natural lakes in the state; 138 of these natural lakes are located within the White River National Forest management boundaries. A tabulation of these NLL water rights is found in Table 2. These are organized by watershed and include the case number, lake name, watershed, county and estimated capacity (acre-feet). Below is a summary of the NLL water right appropriations within the boundaries of the management boundaries.

Summary of CWCB's Natural Lake Level Water Right Appropriations within the White River National Forest Boundaries

Watershed	Blue River	Eagle River	Roaring Fork River	White River	Colorado River	Total
Total Number of Lakes Protected	15	49	64	1	9	138 Natural Lakes
Total Amount Protected (acre-feet)	2262	8520	9588	120	1251	21,741 Acre-Feet

Legal Protection of the CWCB's Instream Flow Water Rights

Statements of Opposition

Under Colorado water law and CWCB policy, when any water right application could injure the CWCB's ISF water right appropriations, then the CWCB staff files a Statement of Opposition with the water court. Once a Statement of Opposition is filed, staff then seeks to have terms and conditions entered into the Applicant's water right decree to protect the Board's ISF water right appropriations from injury.

Since 1987 (when CWCB began keeping such records), CWCB staff has filed a total of 60 Statements of Opposition with the Division Five Water Court to protect its ISF water right appropriations located within the White River National Forest management boundaries.

A tabulation listing the Statements of Opposition filed by the Board to protect its ISF water right appropriations within the White River National Forest management boundaries from 1987 to the present is provided in Table 3. These are organized by watershed and include the application case number, Applicant's name, ISF case number, stream name and county(ies). It should be noted that the timeframe for this analysis was chosen based on the data available in the Statement of Opposition database. Since the database was created in 1987, it only contains Statements of Opposition filed in 1987 or later. (Such legal actions were also taken before 1987, but this level of detail cannot be reproduced for those years.)

Number of Statements of Opposition filed for ISF Water Rights within the White River National Forest Management Boundaries from 1987 to the Present

Watershed	Blue River	Eagle River	Roaring Fork River	White River	Colorado River	Total
Statements of Opposition	21	20	12	3	4	60

W2311

Cooperation with Applicants for Instream Flow Protection

Another means of protecting the Board's ISF water rights is for the CWCB staff to work with Applicants prior to their filing an application with the water court. If the Applicant and staff can work together and agree on fully protective terms and conditions to be included in the water rights application and the final decree, a Statement of Opposition by the Board can sometimes be avoided. Not only does this ensure full protection of the Board's ISF water right appropriations, but it also streamlines the process, which saves the Applicant and the state valuable time and resources.

CWCB Water Acquisition Program

In 1986, the Colorado legislature amended the ISF statute (SB-91) to accommodate federal instream flow needs. The new statute required that the CWCB, in addition to requesting ISF recommendations from state agencies, also request recommendations from the United States Department of Agriculture and the United States Department of the Interior.

The SB-91 was intended to eliminate the need for federal agencies to independently pursue instream flows through attempts to enforce a variety of permits and environmental statutes on federal lands. The intent was top avoid legal confrontations by supplying an alternate means for federal land managers to pursue these issues under state law. For example, if the U.S. Forest Service (USFS), under the Federal Land Policy and Management Act, tried to assert claims for a certain amount of bypass flows before issuing a new permit or renewing an existing permit for the construction of storage or diversion structures on Forest Service land, this program would provide an alternative. Similarly, if the U.S. Army Corps of Engineers that issues Section 404 Permits in consultation with the U.S. Fish and Wildlife Service sought to use the Endangered Species Act (ESA) to ensure the consideration of instream values during the water use permitting process, this program would provide another option. Under SB-91, the federal agencies were explicitly given the opportunity to provide instream flow recommendations to the CWCB Board for protecting the natural environment on the public lands.

In addition to inviting federal participation in the state's ISF Program, SB-91 also provides the CWCB authority to enter into cooperative agreements with other water users or entities to preserve the natural environment. The CWCB is authorized to acquire water, water rights, or interests in water from any person or entity to supplement the existing ISF water rights or use the water as a source to appropriate new instream flow water rights. As a result of this amendment, the Water Acquisition Program (WAP) was created as a component of the ISF Program to acquire water for instream flow uses. The WAP provides the means for the CWCB to acquire water through various contractual agreements, ranging from donation to lease and purchase, thus providing some assurances for maintaining a flowing stream, which may otherwise be unavailable under the CWCB's appropriated rights.

Cooperation between the CWCB and the USFS

The CWCB and the USFS have had several discussions about cooperative efforts for the protection of the natural environment on USFS lands. These include discussions on potentially transferring the water rights that might go along with lands that the USFS has acquired (via purchase or land exchange) to the CWCB for ISF purposes. At this time, only one agreement between the CWCB and the USFS has been signed utilizing the tools provided by SB-91. This agreement provided the transfer of some of the USFS's water rights associated on Hunter Creek to the CWCB for ISF purposes. Table 4 provides some of the details of this agreement. Through these types of agreements, we believe that the CWCB, through the authority it has under the WAP, can address the instream flow needs of the Forest Service in the White River National Forest and other national forests in the state. Table 4 provides some details of the Hunter Creek Agreement as well as other contractual agreements that the CWCB has entered into with other entities the White River National Forest management boundaries. In addition, the CWCB is currently cooperating with the Bureau of Land Management (BLM) to transfer the water rights that the BLM has acquired through land exchange for instream flow uses.

Monitoring and Enforcement of the CWCB Instream Flows

The CWCB monitors all of its ISF water rights throughout the state utilizing both structural and non-structural activities. These activities rely on existing USGS Gages, a network of satellite gages, and numerous staff gages. In addition, the CWCB coordinates closely with the Division Engineers' offices to make sure that the Board's water rights are being administered in priority. With regard to the White River National Forest, the Department of Natural Resources and CWCB have numerous agreements in Summit County that provide protection for ISF water rights. Following is a listing of those agreements:

- Keystone & Arapahoe Basin (Snake River and Keystone Gulch) MOAs
- Breckenridge (Blue River) MOA
- Copper Mountain (Tenmile and West Tenmile Creek) MOA
- Vidler Tunnel Water Co. MOA
- Summit County (Upper and Lower Blue River) MOAs
- Clinton / Fraser MOA which includes the Denver Water Board; the towns of Breckenridge, Dillon, Fraser, Frisco, Granby & Silverthorne; the Grand County Water and Sanitation District; the Ski areas of Breckenridge, Copper Mountain, Keystone, and Winter Park; and Grand and Summit.

W2311

Conclusion

Reasonable protection of the water-dependent natural environment is important to the State of Colorado. This is evident in the actions taken by the state. These actions include the establishment of new laws dealing with the appropriation and use of water within the state, laws to better define how instream flows and natural lake levels are protected, and vesting the state's water planning and policy making agency with the exclusive authority to deal with instream flow protection.

Furthermore, to address the desire of federal agencies and the public to actively participate in streamflow protection, the legislature directed the Board to request recommendations from federal land management and resource agencies as well as state agencies and the public. The water acquisition portion of the ISF Program also provides participating agencies or individuals a great deal of latitude and certainty in the protection of instream flows.

The lands managed under the White River National Forest have benefited greatly and continue to benefit from the State of Colorado's pioneering efforts and continued diligent pursuit of reasonable protection and utilization of its water resources. If the Forest Service believes additional protection of water is needed in the White River National Forest, we encourage USFS to work with the CWCB to address that need.

MANAGEMENT FOR FOREST HEALTH AND WATER YIELD

It is well documented that current Forest Service management practices are causing decreases in water yields. Drastically declining timber harvest and decades of fire suppression have left our forests dangerously over-mature and dense. Not only are these stands subject to the risk of catastrophic wildfires and their associated water quality problems, they contribute to evaporation and choke off water once carried downstream by spring runoffs.

Forest Service management practices on the White River National Forest have eroded baseline flows in rivers and streams originating upon, and flowing through, forest lands. This decline, if left unchecked, will erode flows to the point where environmental goals are unattainable, endangered species habitat is further degraded,[2] and existing water rights, including CWCB instream flow rights, are threatened. Management for forest health and water yield must be addressed in any forest plan being considered.

Forest management should be viewed in the context of the real need to address watersheds and water yields, as well as forest health problems related to insects, disease, overcrowding and decay. Increasingly, forest health problems will detrimentally affect

[2] The Endangered Species Act (ESA) requires federal agencies to ensure that their actions are not likely to jeopardize the continued existence of listed species. Forest Service actions on the White River National Forest may affect endangered species in the Colorado River Basin, such as the Colorado pikeminnow, bonytail chub, razorback sucker and humpback chub.

the quality of wildlife habitat (as mentioned by the Division of Wildlife in that section of these comments), as well as aesthetic and recreational experiences.

The DEIS notes that less than 5% of the applicable forest lands have been harvested, which when combined with 60-years of fire suppression leaves large portions of the forest in old age classes and high loads of dead or downed timber. Rather than increasing the volume suitable for management, Alternative D would reduce that opportunity while increasing prescribed burns.

Prescribed burns are an important management tool, though in some areas can be costly and dangerous to implement, particularly if as implied 95% of the forest requires active treatment to promote forest health and to mitigate the risk of catastrophic wildfires. Moreover, some burns can conflict with federal and state air quality concerns. Such fires on federal lands are the single greatest episodic source of regional haze in our treasured National Parks and wilderness areas, as shown by the Grand Canyon Visibility Transport Commission study. The Forest Service must combine a program of carefully planned fire with other forest management tools (including timber management) to return the forest to a healthy condition with a natural range of age classes, adequate water yields, and healthy wildlife habitat.

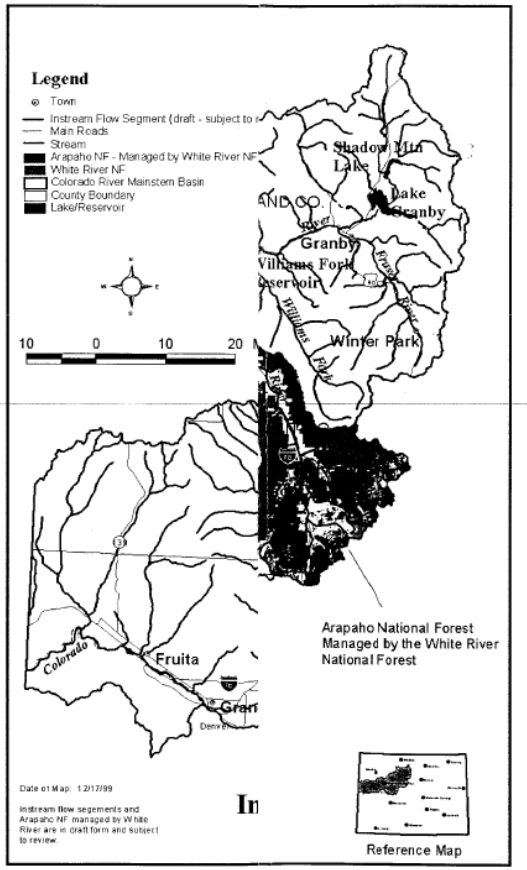
Estimated water yields provided by the Forest Service fail to provide a complete picture of the impacts of Alternative D. The DEIS needs further review on the impacts to water yields. The statement that Alternative D, which would result in higher densities of vegetation, would have positive impacts on water yield is contrary to conventional logic and the best available science.

ACCESS TO WATER SUPPLIES

Only Congress is vested with the authority to designate wilderness and wild and scenic rivers. The de facto enlargement, through the forest plan, of wilderness areas and wild and scenic rivers could impede access to forest lands and water supplies. There are a number of reservoirs, trans-basin diversions, and municipal watersheds located on or immediately adjacent to the forest (see tables 3-1, 3-2, and 3-3). Limiting access to the forest could have serious consequences for the maintenance of adequate water supplies for the people of Colorado. Besides affecting property rights and state water law, there is a significant public safety issue with ditches, reservoirs and other facilities on National Forest lands.

Routine maintenance and minor repairs of facilities should proceed in accordance with historic uses without the need for prior approval, completion deadlines or other conditions. In the event of an emergency, there may not be time to seek Forest Service approval for repairs. If water users are not allowed to maintain their structures adequately, the Forest Service could be responsible for flooding that leads to property damage or even loss of life. The Forest Service has a solemn duty to safeguard the public from flooding, mudslides and other natural disasters. Access should never be limited in such a manner as to jeopardize the public safety.

W2311



W2311

Table 1:

Tabulation of CWCB Instream Flow Water Rights within the White River National Forest

Case No.	Stream	Amount (cfs)	County	Length (miles)
Blue River Watershed				
5-85CW644	Acorn Creek	1	Summit	3.5
5-86CW211	Blue River	2/1	Summit	2.2
5-86CW204	Blue River	20/10	Summit	1
5-86CW217	Blue River	32/16	Summit	1.7
5-87CW295	Blue River	75/58	Summit	6.2
5-87CW299*	Blue River	60/85	Grand;Summit	15.4
5-87CW294	Blue River	55/52/50	Summit	2
5-86CW211	Blue River	5/2	Summit	2.7
5-87CW293	Blue River	50	Summit	0.4
5-87CW297	Blue River	125/90/70/78/90	Summit	4.2
5-87CW298	Blue River	125/90/85/90	Summit	6.9
5-87CW296	Blue River	115/90/78/67/90	Summit	1.6
5-77W3646	Boulder Creek	6/3	Summit	6
5-78W3615	Brush Creek	3	Summit	3
5-80CW037	Cataract Creek	6/3	Summit	6.2
5-80CW038	Cataract Creek	6/3	Summit	2.8
5-85CW643	Crystal Creek	2/0.5	Summit	3.1
5-85CW632	Deer Creek	2	Summit	3.3
5-89CW179	Guller Creek	1.5/0.75	Summit	4.7
5-77W3647	Harrigan Creek	1	Summit	4
5-77W3649	Hay Camp Creek	1	Summit	4
5-89CW233	Indiana Creek	2/1	Summit	3.6
5-86CW092	Keystone Gulch	1.5	Summit	6.4
5-77W3642	Maryland Creek	1	Summit	2
5-85CW647	Meadow Creek	3	Summit	4.1
5-85CW640	Middle Fork Swan River	3	Summit	6.4
5-77W3640	Middle Willow Creek	2	Summit	2
5-85CW649	Miners Creek	1.5	Summit	5
5-86CW093	North Fork, Snake River	3.5/2	Summit	4.5
5-85CW627	North Fork, Swan River	2	Summit	4.5
5-77W3643	North Rock Creek	5	Summit	6
5-85CW641	North Tenmile Creek	3/1.5	Summit	6.1
5-77W3641	North Willow Creek	3	Summit	4
5-85CW642	Officers Gulch	1.5	Summit	2.7
5-77W3614	Otter Creek	3	Summit	4
5-77W3645	Pebble Creek	1	Summit	2
5-77W3648	Slate Creek	7/3	Summit	7
5-86CW224	Snake River	3.5	Summit	2.6
5-86CW210	Snake River	12/6	Summit	4.4
5-77W3651	South Brush Creek	2	Summit	2
5-85CW638	South Fork; Swan River	1.5	Summit	3.3
5-77W3644	South Rock Creek	4	Summit	4
5-77W3639	South Willow; Creek	3	Summit	6
5-85CW645*	Spruce Creek	0.5	Summit; Grand	5.4
5-85CW650	Spruce Creek	2/0.5	Summit	3.4
5-77W3650	Squaw Creek	1	Summit	2

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest W2311

Case No.	Stream	Amount (cfs)	County	Length (miles)
5-85CW648	Straight Creek	2.5	Summit	6.9
5-86CW223	Swan River	6	Summit	6.2
5-86CW209	Tenmile Creek	10/7	Summit	6.5
5-86CW215	West Tenmile Creek	5/3	Summit	5.8
5-86CW205	West Tenmile Creek	5/2	Summit	1.7
5-77W3638	Willow Creek	4	Summit	1
			Total Stream Miles = 216.4	
			Blue River Watershed	

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest W2311

Case No.	Stream	Amount (cfs)	County	Length (miles)
Eagle River Watershed				
5-97CW272	Antoines Cabin Creek	2.5/0.5	Eagle	5.2
5-75W2719	Beaver Creek	12/4	Eagle	7
5-78W3803	Bennett Gulch	2	Eagle	3.5
5-80CW125	Berry Creek	1	Eagle	4.7
5-77W3634	Bighorn Creek	3	Eagle	5
5-77W3635	Black Gore Creek	7/3	Eagle	10
5-86CW230	Black Gore Creek (enlargement)	4	Eagle	n/a
5-77W3632	Booth Creek	3	Eagle	4
5-77W3625*	Brush Creek	12	Eagle	12
5-78W3804	Cataract Creek	1	Eagle	3.5
5-78W3791	Cross Creek	5	Eagle	5
5-78W3793	Cross Creek	10	Eagle	3.5
5-78W3795	Cross Creek	20/8	Eagle	8
5-80CW126*	Eagle River	110/45	Eagle	20
5-80CW134	Eagle River	85/35	Eagle	10.1
5-78W3788	Eagle River	25/11	Eagle	6
5-78W3796	Eagle River	50/20	Eagle	4
5-78W3805	Eagle River	12/6	Eagle	2
5-78W3811	Eagle River	15/8	Eagle	6
5-77W3627	East Brush Creek	7/4	Eagle	10
5-78W3794	East Cross Creek	4	Eagle	2.5
5-80CW123	East Lake Creek	20/10	Eagle	9.3
5-78W3789	Fall Creek	5	Eagle	8
5-78W3785	Game Creek	1	Eagle	3.5
5-77W3628	Gore Creek	10/5	Eagle	7
5-77W3636	Gore Creek	22/8	Eagle	4
5-77W3637	Gore Creek	16/6	Eagle	7
5-86CW221	Gore Creek (enlargement)	5	Eagle	n/a
5-86CW222	Gore Creek (enlargement)	10	Eagle	n/a
5-86CW216	Gore Creek (enlargement)	14	Eagle	n/a
5-78W3798	Grouse Creek	1	Eagle	5
5-78W3800	Grouse Creek	2	Eagle	0.8
5-80CW116*	Gypsum Creek	6	Eagle	16.6
5-80CW117	Gypsum Creek	5	Eagle	4.3
5-80CW132	June Creek	0.5	Eagle	3.4
5-97CW274	Leeman Gulch	3.751.75/0.6/1.75	Eagle	2.1
5-78W3816	Lime Creek	1	Eagle	4
5-78W3812	McAllister Gulch	1	Eagle	2
5-80CW131	Middle Creek	1	Eagle	4.8
5-78W3802	Mitchell Creek	1	Eagle	2.8
5-78W3790	Notch Mountain Creek	1	Eagle	2.5
5-78W3809	Pearl Creek	1	Eagle	2
5-77W3633	Pitkin Creek	3	Eagle	5
5-77W3631	Red Sandstone Creek	2/1	Eagle	4.5
5-77W3631	Red Sandstone Creek	2.5/1.5	Eagle	2.5

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest *W2311*

Case No.	Stream	Amount (cfs)	County	Length (miles)
5-77W3808	Resolution Creek	2	Eagle	4
5-78W3810	Resolution Creek	3	Eagle	2
5-78W3806	Rule Creek	0.5	Eagle	1.5
5-76W3786	Sopris Creek	2	Eagle	3
5-78W3801	South Fork; Eagle River	3	Eagle	6
5-80CW135	Squaw Creek	1	Eagle	5.3
5-80CW133	Stone Creek	1	Eagle	2.9
5-78W3813	Turkey Creek	4	Eagle	6.5
5-78W3815	Turkey Creek	7	Eagle	3
5-78W3797	Two Elk Creek	4	Eagle	4
5-77W3814	Wearyman Creek	2	Eagle	4.5
5-77W3626	West Brush Creek	8/4	Eagle	5
5-78W3799	West Grouse Creek	1	Eagle	5.5
5-80CW122	West Lake Creek	5	Eagle	6.8
5-78W3787	Whitney Creek	1	Eagle	2.5
5-78W3771	Willow Creek	1	Eagle	3
5-78W3807	Yoder Creek	1	Eagle	3
			Total Stream Miles =	**301.6**
			Eagle River Watershed	

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest *W2311*

Case No.	Stream	Amount (cfs)	County	Length (miles)
Roaring Fork River Watershed				
5-75W2776	Avalanche Creek	22/10	Pitkin	4.5
5-76W2941*	Capitol Creek	10	Pitkin	13
5-73W1946	Carter Creek	2/1	Eagle	1
5-76W2947*	Castle Creek	12	Pitkin	16
5-85CW626*	Cattle Creek	4	Garfield; Eagle	13.8
5-73W1950	Chapman Gulch	3/1.5	Pitkin	3.8
5-76W2946	Conundrum Creek	9	Pitkin	9
5-80CW119*	Crystal River	45	Gunnison	0.6
5-80CW120	Crystal River	35	Gunnison	4.7
5-75W2720	Crystal River	100/60	Pitkin; Garfield	12
5-75W2721	Crystal River	80/40	Gunnison; Pitkin	15
5-87CW275	East Creek	1.5	Pitkin	4
5-76W2944	East Maroon Creek	10	Pitkin	5
5-76W2940*	East Sopris Creek	3	Pitkin	11
5-73W1945	Fryingpan River	110/39	Pitkin; Eagle	14
5-73W1948	Fryingpan River	12/6	Pitkin	7
5-73W1955*	Fryingpan River	30/100/150/200/ 100/7565	Pitkin; Eagle	4.3
5-75W2652*	Hunter Creek	8.5	Pitkin	1.9
5-75W2654*	Hunter Creek	11	Pitkin	1.5
5-75W2656*	Hunter Creek	14	Pitkin	6.2
5-80CW018*	Hunter Creek (Bulloch Spring)	0.04/0.01	Pitkin	n/a
5-79CW186*	Hunter Creek (enlargement)	3.5	Pitkin	n/a
5-79CW188*	Hunter Creek (enlargement)	6	Pitkin	n/a
5-79CW190*	Hunter Creek (enlargement)	16	Pitkin	n/a
5-80CW018*	Hunter Creek (Evans No. 1)	7.05/0.06/4/0.1	Pitkin	n/a
5-80CW061*	Hunter Creek (Hunter Ck Flume)	15	Pitkin	n/a
5-80CW018*	Hunter Creek (Hunter Ck Res)	0.02	Pitkin	n/a
5-80CW018*	Hunter Creek (Koch Ditch No.1)	0.02/1	Pitkin	n/a
5-80CW018*	Hunter Creek (Koch No. 3 Ext)	1/0.02	Pitkin	n/a
5-80CW018*	Hunter Creek (McFarlane Ditch)	15.3/0.23/9.46/0. 04	Pitkin	n/a
5-80CW062*	Hunter Creek (Red Mtn. Ditch)	0.5	Pitkin	n/a
5-73W1952	Ivanhoe Creek	2/1	Pitkin	2.8
5-73W1956	Last Chance Creek	3/1.5	Pitkin; Eagle	5.5
5-73W1954	Lime Creek	3/1.5	Pitkin; Eagle	7.7
5-76W2936	Lincoln Creek	8	Pitkin	8
5-76W2937	Lost Man Creek	4	Pitkin	3.5
5-80CW121	Lost Trail Creek	4	Gunnison	3.8
5-76W2945*	Maroon Creek	14	Pitkin	8

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest W2311

Case No.	Stream	Amount (cfs)	County	Length (miles)
5-73W1957	Middle Cunningham Creek	1/0.5	Pitkin	0.5
5-75W2774	Middle Thompson Creek	9/3	Pitkin	8
5-79CW187	Midway Creek	2.5	Pitkin	0.6
5-75W2653	Midway Creek (enlargement)	2.5	Pitkin	0.6
5-73W1953	Mormon Creek	2/1	Pitkin	0.3
5-75W2655	No Name Creek	3	Pitkin	0.7
5-79CW189	No Name Creek;(enlargement)	1	Pitkin	n/a
5-73W1951	North Cunningham Creek	1/0.5	Pitkin	3.2
5-80CW128	North Fork;Crystal River	20	Gunnison	8.5
5-73W1949	North Fork;Fryingpan River	1/0.5	Pitkin; Eagle	3.3
5-75W2775*	North Thompson Creek	7/3	Pitkin	5.4
5-87CW273*	Prince Creek	1	Pitkin	6.2
5-80CW115	Rapid Creek	4	Gunnison	3.4
5-76W2948*	Roaring Fork River	3215	Pitkin	6
5-76W2950	Roaring Fork River	10	Pitkin	7
5-85CW646*	Roaring Fork River	55/30	Pitkin; Eagle	16.1
5-80CW127	Rock Creek	6	Gunnison	3.1
5-76W2943*	Snowmass Creek	12	Pitkin	17
5-92CW280*	Snowmass Creek (enlargement)	3	Pitkin	n/a
5-92CW281*	Snowmass Creek (enlargement)	10.5	Pitkin	n/a
5-80CW129	South Fork;Crystal River	17	Gunnison	4.3
5-73W1947	South Fork;Fryingpan River	6/3	Pitkin	4.5
5-75W2777	South Thompson Creek	5/2	Pitkin	3
5-85CW265	West Maroon Creek	4	Pitkin	1.6
5-76W2942	West Snowmass Creek	3	Pitkin	3
5-76W2939*	West Sopris Creek	3	Pitkin	7
5-76W2938*	Woody Creek	6	Pitkin	13
5-80CW114	Yule Creek	8	Gunnison	7.4
			Total Stream Miles =	**321.3**
			Roaring Fork River Watershed	

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest W2311

Case No.	Stream	Amount (cfs)	County	Length (miles)
White River Watershed				
5-80CW378	East Fork Fawn Creek	2	Rio Blanco	2.8
5-80CW371*	East Miller Creek	4	Garfield; Rio Blanco	6.2
5-80CW379*	Fawn Creek	3	Rio Blanco	2.8
5-77W3652	Lost Creek	10	Rio Blanco	0.8
5-77W3652*	Marvine Creek	40	Rio Blanco	4
5-80CW369	Middle Miller Creek	2	Rio Blanco	11.8
5-77W3652*	North Fork White River	120	Rio Blanco	10.5
5-78W3704*	North Fork White River	70	Rio Blanco	9
5-80CW376	Papoose Creek	2.5	Rio Blanco	6.4
5-80CW372	Ripple Creek	4	Garfield,;Rio Blanco	4.2
5-80CW373	Skinny Fish Creek	6	Garfield	3
5-80CW374	Snell Creek	5	Rio Blanco	4.1
5-80CW378*	Ute Creek	6	Rio Blanco	10.1
5-80CW377	West Fork Fawn Creek	2	Rio Blanco	3
			Total Stream Miles =	**78.7**
			White River Watershed	

* Denotes ISF Water Rights Partially Located in the White River National Forest

Table 1: Instream Flow Water Rights in the White River National Forest *W2311*

Case No.	Stream	Amount (cfs)	County	Length (miles)
Colorado River Watershed				
5-95CW289	Castle Creek	1.75/1/0.5	Eagle	4.6
5-87CW272*	Cottonwood Creek	2	Eagle	2.1
5-96CW350	Dead Horse Creek	90/15/6/22	Garfield	0.8
5-80CW312*	Deep Creek	14/8	Garfield; Eagle	20.8
5-85CW266	Deep Creek	2	Rio Blanco; Garfield	10
5-85CW261*	Derby Creek	7.5	Eagle	7.8
5-77W3629	Dickson Creek	2	Eagle	3
5-80CW294*	East Elk Creek	10/6	Garfield	12.8
5-96CW351	East Fork Dead Horse Creek	28/6/3/7	Garfield	3.5
5-96CW351	East Fork Dead Horse Creek	90/15/6/22	Garfield	1.9
5-89CW183	East Fork Red Dirt Creek	1.5/0.75	Eagle	6.5
5-85CW262	East Fork Eagle River	1.5	Eagle	6.4
5-85CW263	East Fork Eagle River	2	Eagle	1.7
5-86CW228	East Meadow Creek	1	Eagle	4.4
5-80CW316	East Rifle Creek	3	Garfield	2
5-80CW317*	East Rifle Creek	6	Garfield	10.8
5-77W3630	Freeman Creek	1	Eagle	3
5-85CW264	Grizzly Creek	3	Garfield	10.1
5-87CW271	Hat Creek	2/1	Eagle	4.5
5-80CW311*	Main Elk Creek	10/6	Garfield	20.6
5-86CW218	Meadow Creek	1.5	Eagle	3.9
5-80CW319*	Middle Rifle Creek	3	Garfield	10.6
5-85CW267	No Name Creek	2	Garfield	7.7
5-85CW656	Nolan Creek	1.5	Eagle	2.9
5-87CW270	Nolan Creek	2.5/1.5	Eagle	1.5
5-95CW287	Norman Creek	0.75/0.5/0.25	Eagle	3.7
5-86CW220	North Fork Piney River	2	Eagle	6.7
5-86CW227	Piney River	6.5	Eagle	3.2
5-86CW229*	Piney River	9	Eagle	11.6
5-95CW286	Red Dirt Creek	3/1.75/1	Eagle	2.6
5-89CW185	Sheep Creek	1.5/0.75	Eagle	1
5-86CW219*	Sheephorn Creek	4.5	Eagle; Grand	10.5
5-89CW182	South Fork Derby Creek	4.5/2	Eagle	6.5
5-86CW203	South Fork Piney River	1	Eagle	4.9
5-80CW313*	Sweetwater Creek	18	Garfield; Eagle	19.8
5-80CW318	Three Forks Creek	3	Garfield	5.2
5-96CW352	West Fork Dead Horse Creek	31/9/4/13	Garfield	5.2
5-89CW184	West Fork Red Dirt Creek	2.5/1/0.5	Eagle	5.9
			Total Stream Miles = 250.7	
			Colorado River Watershed	

* Denotes ISF Water Rights Partially Located in the White River National Forest

Page 8

W2311

Table 2:

Tabulation of CWCB Natural Lake Level Water Rights within the White River National Forest

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
Blue River Watershed				
W-3041	Lost	Blue	Summitt	75
W-3042	Mahan	Blue	Summitt	173
W-3043	Mirrow	Blue	Summitt	41
W-3044	Upper Slate	Blue	Summitt	336
W-3045	Slate No. 1	Blue	Summitt	350
W-3046	Boulder	Blue	Summitt	8
W-3047	Salmon	Blue	Summitt	70
W-3048	Cliff	Blue	Summitt	271
W-3193	Lost	Blue	Summit	9
W-3194	Mowhawk No.2	Blue	Summt	444
W-3195	Mowhawk No.6	Blue	Summit	288
W-3220	Mohawk No. 5	Blue	Summit	15
W-3221	Mohawk No. 7	Blue	Summit	64
W-3196	Lower Wheeler	Blue	Summit	48
W-3197	Upper Wheeler	Blue	Summit	70

Total Estimated Capacity (Acre-Feet) = 2262
Total Number of Lakes= 15
Blue River Watershed

Page 1

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
Eagle River Watershed				
W-3002	Mystic Island	Eagle	Eagle	465
W-3003	Missouri No. 1	Eagle	Eagle	42
W-3004	Missouri No. 2	Eagle	Eagle	32
W-3006	Missouri No. 4	Eagle	Eagle	25
W-3007	New York	Eagle	Eagle	1,240
W-3010	Blodgett	Eagle	Eagle	1,175
W-3011	Lost	Eagle	Eagle	56
W-3012	Ragged	Eagle	Eagle	33
W-3013	Brady No. 1	Eagle	Eagle	13
W-3014	Brady No. 2 (Sopris)	Eagle	Eagle	143
W-3016	Rim	Eagle	Eagle	36
W-3017	Sugar Loaf	Eagle	Eagle	45
W-3018	Lower Tuhare	Eagle	Eagle	276
W-3019	Bowl of Tears	Eagle	Eagle	1,010
W-3020	Upper Tahare	Eagle	Eagle	1,548
W-3021	Seven Sisters No. I	Eagle	Eagle	15
W-3022	Seven Sisters No. 2	Eagle	Eagle	18
W-3023	Seven Sisters No. 3	Eagle	Eagle	38
W-3024	Seven sisters No. 4	Eagle	Eagle	63
W-3025	Upper Turquoise	Eagle	Eagle	68
W-3026	Mulhall No. 1	Eagle	Eagle	25
W-3027	Mulhall No. 2	Eagle	Eagle	68
W-3029	Deluge	Eagle	Eagle	28
W-3030	Lake Thomas	Eagle	Eagle	532
W-3031	Gore	Eagle	Eagle	25
W-3032	Pitkin	Eagle	Eagle	128
W-3033	Booth	Eagle	Eagle	60
W-3034	Lost No. 1	Eagle	Eagle	19
W-3035	Lost No. 2	Eagle	Eagle	4
W-3036	Lost No. 3	Eagle	Eagle	90
W-3037	Lost No. 4	Eagle	Eagle	45
W-3038	Middle	Eagle	Eagle	130
W-3039	Rainbow	Eagle	Eagle	24
W-3040	Lower Turquoise	Eagle	Eagle	11
W-3050	Paradise No. 3	Eagle	Pitkin	14
W-3077	Bench No. 1	Eagle	Pitkin	9
W-3078	Bench No. 2	Eagle	Pitkin	276
W-3079	Paridise No. 4	Eagle	Pitkin	80
W-3188	Beaver	Eagle	Pitkin	147
W-3199	Boarh	Eagle	Pitkin	23
W-3200	Cleveland	Eagle	Eagle	26
W-3201	Fancy	Eagle	Eagle	84
W-3203	Hunky Dory	Eagle	Eagle	40
W-3222	Muckey	Eagle	Eagle	8.5
W-3235	Antoines Cabin No. 1	Eagle	Eagle	12

Page 2

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
W-3237	Whitney	Eagle	Eagle	84
W-3028	Grouse	Eagle	Eagle	8
W-3005	Missouri No. 3	Eagle	Eagle	169
W-3236	Antoines Cabin No. 2	Eagle	Eagle	9

Total Estimated Capacity (Acre-Feet) = 8519.5
Total Number of Lakes= 49
Eagle River Watershed

Page 3

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
Roaring Fork River Watershed				
W-3052	Scott	Roaring Fork	Pitkin	41
W-2963	Yule No. 1 Gunnison	Roaring Fork	Gunnison	60
W-2964	Yule No. 2 Gunnison	Roaring Fork	Gunnison	40
W-2965	Yule No. 3 Gunnison	Roaring Fork	Gunnison	14
W-2966	Yule No. 4 Gunnison	Roaring Fork	Gunnison	29
W-3008	Upper Strawberry	Roaring Fork	Eagle	55
W-3009	Josephine	Roaring Fork	Eagle	27
W-3015	Carter	Roaring Fork	Eagle	70
W-3049	Geneva	Roaring Fork	Gunnison	658
W-3051	Snowmass	Roaring Fork	Pitkin	2050
W-3053	Diemer	Roaring Fork	Pitkin	300
W-3054	Sellar	Roaring Fork	Pitkin	350
W-3055	Lower Savage	Roaring Fork	Pitkin	308
W-3056	Upper Savage	Roaring Fork	Pitkin	78
W-3057	Willow	Roaring Fork	Pitkin	420
W-3058	Sawyer	Roaring Fork	Pitkin	214
W-3059	Weller	Roaring Fork	Pitkin	108
W-3060	Truro	Roaring Fork	Chaffer	101
W-3061	Tabor	Roaring Fork	Pitkin	75
W-3062	Petroleum	Roaring Fork	Pitkin	434
W-3063	Anderson	Roaring Fork	Pitkin	56
W-3064	Williams	Roaring Fork	Pitkin	58
W-3065	Avalanche	Roaring Fork	Pitkin	124
W-3066	Capitol	Roaring Fork	Pitkin	1,085
W-3067	Pierre No. 1	Roaring Fork	Pitkin	55
W-3068	Pierre No. 1	Roaring Fork	Pitkin	210
W-3069	Pierre No. 3	Roaring Fork	Pitkin	750
W-3070	Pierre No. 4	Roaring Fork	Pitkin	170
W-3071	Lower Fryingpan	Roaring Fork	Pitkin	2
W-3072	Middle Fryingpan	Roaring Fork	Pitkin	22
W-3073	American	Roaring Fork	Pitkin	53
W-3074	Thomas No. 1	Roaring Fork	Pitkin	184
W-3075	Thomas No. 2	Roaring Fork	Pitkin	88
W-3076	Thomas No. 3	Roaring Fork	Pitkin	9
W-3080	Grizzly	Roaring Fork	Pitkin	188
W-3081	Chapman	Roaring Fork	Pitkin	8
W-3082	Lyle	Roaring Fork	Pitkin	150
W-3083	Independence	Roaring Fork	Pikin	86
W-3084	Linkins	Roaring Fork	Pitkin	220
W-3085	Deadman	Roaring Fork	Pitkin	8
W-3086	Lower Granite	Roaring Fork	Pitkin	40
W-3087	Upper Granite	Roaring Fork	Pitkin	22
W-3088	Upper Frying Pan	Roaring Fork	Pitkin	68
W-3089	Lost Man	Roaring Fork	Pitkin	360
W-3090	Mormon	Roaring Fork	Pitkin	48

Page 4

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
Roaring Fork River Watershed				
W-3052	Scott	Roaring Fork	Pitkin	41
W-2963	Yule No. 1 Gunnison	Roaring Fork	Gunnison	60
W-2964	Yule No. 2 Gunnison	Roaring Fork	Gunnison	40
W-2965	Yule No. 3 Gunnison	Roaring Fork	Gunnison	14
W-2966	Yule No. 4 Gunnison	Roaring Fork	Gunnison	29
W-3008	Upper Strawberry	Roaring Fork	Eagle	55
W-3009	Josephine	Roaring Fork	Eagle	27
W-3015	Carter	Roaring Fork	Eagle	70
W-3049	Geneva	Roaring Fork	Gunnison	658
W-3051	Snowmass	Roaring Fork	Pitkin	2050
W-3053	Diemer	Roaring Fork	Pitkin	300
W-3054	Sellar	Roaring Fork	Pitkin	350
W-3055	Lower Savage	Roaring Fork	Pitkin	308
W-3056	Upper Savage	Roaring Fork	Pitkin	78
W-3057	Willow	Roaring Fork	Pitkin	420
W-3058	Sawyer	Roaring Fork	Pitkin	214
W-3059	Weller	Roaring Fork	Pitkin	108
W-3060	Truro	Roaring Fork	Chaffer	101
W-3061	Tabor	Roaring Fork	Pitkin	75
W-3062	Petroleum	Roaring Fork	Pitkin	434
W-3063	Anderson	Roaring Fork	Pitkin	56
W-3064	Williams	Roaring Fork	Pitkin	58
W-3065	Avalanche	Roaring Fork	Pitkin	124
W-3066	Capitol	Roaring Fork	Pitkin	1,085
W-3067	Pierre No. 1	Roaring Fork	Pitkin	55
W-3068	Pierre No. 1	Roaring Fork	Pitkin	210
W-3069	Pierre No. 3	Roaring Fork	Pitkin	750
W-3070	Pierre No. 4	Roaring Fork	Pitkin	170
W-3071	Lower Fryingpan	Roaring Fork	Pitkin	2
W-3072	Middle Fryingpan	Roaring Fork	Pitkin	22
W-3073	American	Roaring Fork	Pitkin	53
W-3074	Thomas No. 1	Roaring Fork	Pitkin	184
W-3075	Thomas No. 2	Roaring Fork	Pitkin	88
W-3076	Thomas No. 3	Roaring Fork	Pitkin	9
W-3080	Grizzly	Roaring Fork	Pitkin	188
W-3081	Chapman	Roaring Fork	Pitkin	8
W-3082	Lyle	Roaring Fork	Pitkin	150
W-3083	Independence	Roaring Fork	Pikin	86
W-3084	Linkins	Roaring Fork	Pitkin	220
W-3085	Deadman	Roaring Fork	Pitkin	8
W-3086	Lower Granite	Roaring Fork	Pitkin	40
W-3087	Upper Granite	Roaring Fork	Pitkin	22
W-3088	Upper Frying Pan	Roaring Fork	Pitkin	68
W-3089	Lost Man	Roaring Fork	Pitkin	360
W-3090	Mormon	Roaring Fork	Pitkin	48

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
White River Watershed				
W-3204	Pagoda	White	Rio Blanco	120

Total Estimated Capacity (Acre-Feet) = 120
Total Number of Lakes= 1
White River Watershed

Table 2: Natural Lake Level Water Rights in the White River National Forest *W2311*

Case No.	Lake Name	Watershed	County	Est. Capacity (Acre-Feet)
Colorado River Watershed				
W-3187	Stone	Colorado	Grand	24
W-3189	Caribou	Colorado	Grand	28
W-3190	Crater	Colorado	Grand	780
W-3191	Gourd	Colorado	Grand	35
W-3192	Pawnee	Colorado	Grand	121
W-3223	Blue	Colorado	Grand	16
W-3224	Bowen	Colorado	Grand	220
W-3238	Columbine	Colorado	Grand	10
W-3239	Parika	Colorado	Routt	17

Total Estimated Capacity (Acre-Feet) = 1251
Total Number of Lakes= 9
Colorado River Watershed

Page 7

W2311

Table 3:

Tabulation of Statements of Opposition filed by the CWCB to Protect the Instream Flow Water Rights within the White River National Forest

(1987 to the Present)

Table 3: Statements of Opposition Filed from 1987 to the Present W2311

Case No.	Applicant	CWCB Case No.	Stream Name	County
Blue River Watershed				
5-92CW237	Hydraulics Links LLC	86CW217	Blue River	Summit
5-92CW294	Breckenridge Ski Area	86CW204, 86CW217	Blue River	Summit
5-92CW331	Keystone Resorts Management Inc.	87CW299	Blue River	Grand, Summit
5-94CW028	Whitehill	86CW217	Blue	Summit
5-96CW060	Ilex Investment Co., Inc.	86CW211 to 217	Blue River	Summit
5-96CW176	L.G. Everist, Inc.	5-87CW295-298	Blue River	Summit
5-96CW341	S.G. Company	5-87CW297, 5-87CW298	Blue River	Summit
5-96CW370	Oasis Ranches	5-87CW297, 5-87CW298	Blue River	Summit
5-97CW283	Breckenridge, Town of	85CW649, 86CW204, 86CW217	Miners Creek, Blue River	Summit
5-98CW296	Farmers Korner, Inc. & Richard and Sheila Henrickson	86CW217	Blue River	Summit
5-98CW314	Bruhn, Otto X. and Lillian A.	86CW211, 86CW204, 86CW217	Blue River	Summit
5-98CW069	Timber Creek Water Company	5-86CW211, 5-86CW204 and 86CW217	Blue River	Summit
5-98CW064	The Dunkin Group	5-86CW204 and 5-86CW217	Blue River	Summit
5-98CW095	Dundee Realty USA, Inc. (A-Basin Ski Area)	5-86CW093	North Fork Snake River	Summit
5-98CW095	Dundee Realty USA, Inc	5-86CW093	North Fork Snake	Summit
5-98CW297	Bailey, Brownell M.	89CW233, 86CW204, 86CW217	Indiana Creek, Blue River	Summit
5-99CW071	Key West Homeowners Association	86CW210	Snake River	Summit
5-99CW149	Grigsby	5-86CW223, 5-86CW217	Swan River, Blue River	Summit
5-97CW305	Vidler Water Company	All Blue River	Blue River, Swan River, Spruce Creek, Monte Cristo	Summit

Table 3: Statements of Opposition Filed from 1987 to the Present W2311

Case No.	Applicant	CWCB Case No.	Stream Name	County
5-87CW376	Denver Water Board	87CW293, 87CW294, 87CW295, 87CW296, -299	Blue River	Summit, Grand
5-95CW122	Grand and Summit County Commissioners		Summit County ISF's	Summit & Grand

Table 3: Statements of Opposition Filed from 1987 to the Present *W2311*

Case No.	Applicant	CWCB Case No.	Stream Name	County
Eagle River Watershed				
5-95CW209	East West Partners	5-77W3625	Brush Creek	Eagle
5-88CW046C	Upper Eagle Regional Water Authority	80CW134	Eagle River	Eagle
5-94CW022	UERWA & Avon Metro	80CW134, 77W3636 & 77W3637	Eagle River / Gore Creek	Eagle
5-94CW292	Town of Eagle	77W3626, 3625, 80CW124	W. Brush, Brush, Eagle River	Eagle
5-95CW272	City of Colorado Springs / Aurora		Eagle River u/s Cross Ck & Tribs.	Eagle,Lake, Pitkin
5-95CW348	Upper Eagle Regional Water Authority	85CW262, on down to end of eagle river	east fork eagle river, eagle river	Eagle
5-96CW373	Eagle County School District	5-80CW124, 5-80CW126	Eagle River	Eagle
5-96CW377	Town of Gypsum	5-80CW124, 5-80CW116	Eagle River, Gypsum Creek	Eagle
5-97CW288	Colorado River Water Conservation District	78W3811, 78W3805, 85CW262, 85CW263	Eagle River, East Fork Eagle River	Eagle
5-97CW298	Vail Associates and G. Jouflas	80CW126	Eagle River	Eagle
5-97CW306	EMD LLC	80CW134	Eagle River	Eagle
5-98CW203	Vail Associates, Inc.	78CW3796, 80cw134, 80cw126, 80cw124	Eagle River	Eagle
5-98CW204	Eagle River Water & Sanitation District	77W3637, 77W3636, 80CW134, 80CW126, 80CW	Gore Creek, Eagle River	Eagle
5-98CW205	Upper Eagle Regional Water Authority	80cw134, 80cw126, 80cw124	Eagle River	Eagle
5-98CW260	CJC Properties	80CW126, 80CW124	Eagle River	Eagle, Grand
5-99CW172	Town of Avon	5-78W3805, 78W3811, 78W3788, 78W3796, 80	Eagle River	Eagle
5-99CW031	Kensington Partners & Squaw Ck. Metro. District	80CW126, 80CW124, 80CW135	Eagle River, Squaw Creek	Eagle

Table 3: Statements of Opposition Filed from 1987 to the Present *W2311*

Case No.	Applicant	CWCB Case No.	Stream Name	County
Eagle River Watershed Continued				
5-99CW090	Vail Associates, Inc.	75CW2719	Beaver Creek	Eagle
5-98CW270	City of Aurora, et al.	various	All Eagle and Roaring Fork River ISFs	Eagle, Garfield, Grand, Pitkin, Summit
5-92CW336	Climax Molybdenum Company	2-77W4646, 85CW262, 86CW209	EFK Arkansas, EFK Eagle River, Tenmile Creek	Summit, Lake, Eagle

Table 3: Statements of Opposition Filed from 1987 to the Present *W2311*

Case No.	Applicant	CWCB Case No.	Stream Name	County
Roaring Fork River Watershed				
5-98CW270	City of Aurora, et al.	various	All Eagle and Roaring Fork River ISFs	Eagle, Garfield, Grand, Pitkin, Summit
5-95CW124	Thomas Girardi	5-85CW646	Roaring Fork River	Pitkin
5-92CW347	Starwood Water District	85CW646	Roaring Fork River	Pitkin
5-89CW283	Maroon Creek Development Corp.	76W2945	Maroon Creek	Pitkin
5-90CW138	Town of Basalt	85CW646; 85CW639	Roaring Fork River	Pitkin; Eagle
5-96CW055	Wilhelm		Roaring Fork River	Pitkin
5-91CW263	Gateway of Snowmass	76W2942, 76W2941, 92CW281	Snowmass, Capitol Creek	Pitkin
5-97CW053	Roaring Fork Club, LP	5-85CW646	Roaring Fork River	Pitkin
5-97CW115	Edward Adelson	5-76W2940	East Sopris Creek	Pitkin
5-98CW092	Carbondale, Town of	5-75W2720 and 5-85CW639	Crystal River and Roaring Fork River	Garfield
5-98CW290	WTS Cabin Partners	76W2947	Castle Creek	Pitkin
5-98CW312	Los Amigos Ranch Partnership	75W2720	Crystal River	Garfield

Table 3: Statements of Opposition Filed from 1987 to the Present *W2311*

Case No.	Applicant	CWCB Case No.	Stream Name	County
White River Watershed				
5-93CW250	Rocky Mountain Power Company	several	White River drainage	Rio Blanco
5-93CW251	Rocky Mountain Power Company	several	White River drainage	Rio Blanco
5-98CW307	Diamond M, LLC	77W3652	Marvine Creek	Rio Blanco

Table 3: Statements of Opposition Filed from 1987 to the Present *W2311*

Case No.	Applicant	CWCB Case No.	Stream Name	County
Colorado River Watershed				
5-90CW333	Bender	80CW294	East Elk Creek	Garfield
5-93CW305	Kummer Development Corp.	87CW270	Nolan Creek	Eagle
5-95CW334	Puma Paw Ranch, Inc	80CW319	Middle Rifle Creek	Garfield
5-97CW060	State of Colorado, Dept. of Corrections	5-80CW319	Middle Rifle Creek	Garfield

Page 7

W2311

Table 4:

Acquisition Agreements between the CWCB and other Entities within the White River National Forest

W2529

RESOLUTION NO. 2
(Series of 2000)

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ASPEN, COLORADO, ENDORSING THE NORTHWEST COLORADO COUNCIL OF GOVERNMENTS' COMMENTS TO THE US FOREST SERVICE ON THE PROPOSED REVISED LAND AND RESOURCE MANAGEMENT PLAN FOR THE WHITE RIVER NATIONAL FOREST.

WHEREAS, the Northwest Colorado Council of Governments (NWCCOG) has made comments to the United States Forest Service in three areas, all of which the City of Aspen strongly supports and wishes to endorse, and

WHEREAS, The City Council of the City of Aspen, Colorado believes that the White River National Forest (WRNF) Master Plan should include a system for having the WRNF and other jurisdictions including local governments, work collaboratively to identify areas of joint interest or jurisdiction, since the Forest adjoins developed areas and actions taken by one entity greatly impact other entities, and

WHEREAS, The tremendous urbanization and growth in population and recreation that have occurred within, adjacent to, and near the WRNF since the plan was last revised, is the greatest issue faced in managing the Forest, and is one of the main issues that required revision of the Plan, and

WHEREAS, Conflicting demands for use of the Forest, impacts of local government and private decisions on the Forest, and impacts of Forest actions on local areas, all make it imperative that growth and its impacts be addressed collaboratively by the USFS and local governments, and

WHEREAS, Since no one entity can by itself address the issue of growth and urbanization, and it impacts all jurisdictions,

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ASPEN, COLORADO, that the City Council endorses and supports the comments made by the Northwest Colorado Council of Governments and urges the Forest Service to include the following three items in its revised management plan for the White River National Forest:

Section 1. The White River National Forest Management Plan should set up a system whereby all affected government entities identify areas of intermix lands, identify issues, and develop joint management prescriptions. The plan that governs the forest for the next several years should include a program for ensuring that these entities work together as much as possible to discuss joint issues and ways to work together in managing intermix areas.

W2311

Table 4: Acquisition Agreements between the CWCB and other Entities within the White River National Forest

Stream	ISF Amount	Agrmnt / MOU (Agreement) / (MOU)	Parties Involved	Terms
Hunter Creek	8.5/11/14 cfs (org) 3.5/6/16 cfs (enl) Total: 12/17/30 cfs	Agreement	(Colorado Department of Natural Resources(DNR), Colorado Water Conservation Board (CWCB), Southeastern Colorado Water Conservancy District (SECWCD), City of Aspen, & Pitkin County) / (CWCB, Colorado Division of Wildlife (DOW) & United States Forest Service (USFS))	In October 1978, the DNR, CWCB, SECWCD, City of Aspen, and Pitkin County entered into an agreement to resolve concerns relative to operation of the Fryingpan-Arkansas Project. Pursuant to this agreement, the CWCB agreed to file for instream flow (ISF) water rights on Hunter Creek for the full bypass amounts. The CWCB also agreed to join with Aspen to change the use of the City's senior irrigation water rights to instream flow uses, and also committed to work with the USFS to utilize the USFS' water rights for ISF use on Hunter Creek. The CWCB was successful in appropriating additional ISF rights on Hunter Creek (enlargement) for the full bypass amounts and prosecuting a change of Aspen's water rights to supplement ISF rights on Hunter Creek. To comply with the third requirement, the CWCB, DOW, and USFS entered into a land-water exchange MOU in 1979 that granted the CWCB the use of USFS' senior water rights for ISF uses. Pursuant to this MOU, the USFS agreed to allow the DOW/CWCB to change the use of a number of its senior agricultural water rights to instream flow uses in exchange for DOW to enter into a land exchange or other appropriate transaction with the USFS. The interest of the USFS in the water rights would terminate at the time the land exchange or appropriate transaction would be completed. However, due to various reasons, including differences in the appraisal values of land and water, it took over ten years before the CWCB was finally able to complete the change of use of the USFS' water rights to supplement the Hunter Creek ISF water rights. This has now been completed.
Castle Creek	12 cfs	Agreement	CWCB & Aspen	In 1998, the CWCB entered into an intergovernmental agreement with the City of Aspen allowing Aspen to supplement the ISF water right on Castle Creek when necessary. Pursuant to this agreement, Aspen will forego diversion of a portion of its municipal and/or irrigation water rights to maintain a streamflow of 12 cfs on Castle Creek between the Midland Flume and the confluence of Castle Creek and the Roaring Fork River.
Snowmass Creek	12 cfs (org) -5/3.5/10.5 cfs (enl) Total: 7/15.5/22.5 cfs	Agreement	CWCB & The Conservation Fund (TCF)	In 1998, the CWCB entered into a donation agreement with TCF, accepting certain water rights from TCF to supplement the Snowmass Creek ISF water rights. The donation agreement is subject to the condition that Aspen Village, Inc. (a corporation owned by TCF) will successfully obtain an absolute decree for its conditional water right before January 1, 2000. Aspen Village, Inc. must still settle with one objector or proceed to trial before obtaining an absolute decree.

W2529

Section 2. It is essential that a program be implemented to jointly discuss the issue of growth and urbanization and examine collaborative solutions. The Plan needs to ensure that affected parties will collaborate to mitigate impacts of decisions each makes on others, and to recognize that working together these issues can be addressed, while no one entity alone can solve the problems created by growth and urbanization.

Section 3. The plan needs to include a program to create cooperation with local governments to make sure decisions promote healthy ecosystems and communities. The plan would be improved by including ways to ensure that decisions made by both local governments and the Forest were made in the context of knowledge about their effects on ecosystems. The economic health of the City of Aspen depends directly on the preservation of recreation opportunities and the health of the forest ecosystems. Working collaboratively is the most effective way to ensure the success of both the Forest and our local community.

RESOLVED, APPROVED AND ADOPTED this 10th day of January, 2000, by the City Council for the City of Aspen, Colorado.

Rachel E. Richards, Mayor

I, Kathryn S. Koch, duly appointed and acting City Clerk do certify that the foregoing is a true and accurate copy of that resolution adopted by the City Council of the City of Aspen, Colorado, at a meeting held January 19, 2000.

Kathryn S. Koch, City Clerk

C:\home\word\wrnfreso.doc

ASPEN - PITKIN ENVIRONMENTAL HEALTH DEPARTMENT
130 SOUTH GALENA STREET
ASPEN, COLORADO 81611-1975

W2701

Northwest Colorado COUNCIL OF GOVERNMENTS

P.O. Box 2308 · 249 Warren Ave. · Silverthorne, CO 80498 · 970-468-0295 · Fax: 970-468-1208 · www.nwcog.co.us

January 28, 2000

Forest Planning Team
White River National Forest
P.O. Box 948
Glenwood springs, Colorado 81602

MEMBER JURISDICTIONS
EAGLE COUNTY
Avon
Basalt
Eagle
Gypsum
Minturn
Red Cliff
Vail
GRAND COUNTY
Fraser
Granby
Grand Lake
Hot Sulphur Springs
Kremmling
Winter Park
JACKSON COUNTY
Walden
PITKIN COUNTY
Aspen
SUMMIT COUNTY
Blue River
Breckenridge
Dillon
Frisco
Montezuma
Silverthorne

Northwest Colorado Council of Governments (NWCCOG) appreciates this opportunity to respond to the Proposed Revised Land and Resource Management Plan for the White River National Forest and Draft Environmental Impact Statement.

Northwest Colorado Council of Governments was established as Colorado planning and management Region XII in 1972 by Executive Order of the Governor in response to the Federal Intergovernmental Cooperation Act of 1968. Regional planning was encouraged as a means to avoid overlap, duplication and competition between local planning activities. Today, NWCCOG serves a five county region comprised of the following twenty-six member jurisdictions:

1. Eagle County
2. Town of Avon
3. Town of Basalt
4. Town of Eagle
5. Town of Gypsum
6. Town of Minturn
7. Town of Red Cliff
8. Town of Vail
9. Grand County
10. Town of Town of Fraser
11. Town of Granby
12. Town of Grand Lake
13. Town of Hot Sulphur Springs
14. Town of Kremmling
15. Town of Winter Park
16. Jackson County
17. Town of Walden
18. Pitkin County
19. City of Aspen
20. Summit county
21. Town of Blue River
22. Town of Breckenridge
23. Town of Dillon
24. Town of Frisco
25. Town of Montezuma
26. Town of Silverthorne

The NWCCOG Board of Directors approved the attached response to the Proposed Revised Land and Resource Management Plan for the White River National Forest on January 28, 2000. Although the attached response is the official response of Northwest Colorado Council of Governments through its member jurisdictions, each jurisdiction reserves the right to submit its own individual response on behalf of its citizens.

Peg Toft, NWCCOG Chairman and Mayor of Kremmling

Robert Anderson, NWCCOG Vice-chairman and Grand County Commissioner

Tootie Crowner, NWCCOG Secretary/Treasurer and Jackson County Commissioner

CC: Lyle Laverty, Regional Forester, USDA Forest Service, Rocky Mountain Region
Scott McInnis, United States Representative, 3rd District, Colorado
Wayne Allard, United States Senator, Colorado
Ben Nighthorse Campbell, United States Senator, Colorado
Bill Owens, Governor, Colorado

1

Northwest Colorado Council of Governments' Response to the Proposed Revised Land and Resource Management Plan for the White River National Forest

Summary of Response

Collaboration and cooperation between the White River National Forest and adjacent and/or impacted local county and municipal governments in the development, implementation, monitoring and evaluation of the prescribed management actions on National Forest System lands is of utmost interest to Northwest Colorado Council of Governments.

The White River National Forest stated that, *"Collaboration was used to bring government agencies and individuals together to discuss and better understand the revision process and resource issues, and provide input to help develop alternatives. Our goal was for those with different interests, issues and concerns to discuss national forest management and provide options for managing the Forest."*[1] Although NWCCOG applauds the WRNF on its intent to provide a collaborative process to involve local governments, we believe that the Forest fell short of its intent. It is the belief of NWCCOG that much of the deficiency rests in the fact that there is no direction, mechanism or established process for effectively collaborating with local governments. NWCCOG is concerned that, although there are goals for collaboration, there are no standards or guidelines under current regulations that insure that measurable objectives will be established for its effective implementation. The proposed rules for forest planning, contained within 36 CFR Parts 217 and 219, prescribe increased collaboration between responsible forest officials and local governments. NWCCOG strongly suggests that these proposed rule changes, with modifications proposed by NWCCOG in our response to the agency on December 9, 1999, be implemented by the White River National Forest in the forest plan revision process, Final Environmental Impact Statement, and Record of Decision.

Northwest Colorado Council of Governments did not evaluate the alternatives by either a forest-wide analysis or a comparative analysis, since we believe that collaboration with local governments is a deficiency in all alternatives. Therefore, NWCCOG did not establish a preference of one alternative over another. However, NWCCOG unequivocally believes and recommends that whatever revision of the management plan be approved for the White River National Forest, three components must be included:

1. **The effects of urbanization (growth) on multi-jurisdictional planning and management must be assessed in collaboration with appropriate local general-purpose governmental jurisdictions and local, state, and federal land and resource management agencies.**

2. **A multi-jurisdictional collaborative process must be established for the identification, planning, management, and monitoring of intermixed and or adjacent lands of other jurisdictions that are of concern to those jurisdictions.**

[1] Draft Environmental Impact Statement, Appendix A, 1999.

3. **A collaborative process must be established to identify goals and objectives for multi-jurisdictional management actions that will strive to sustain community vitality and healthy ecosystems on a regional basis.**

The remainder of the response is an elaboration of the three aforementioned points.

1. The effects of urbanization (growth) on multi-jurisdictional planning and management must be assessed in collaboration with appropriate local general-purpose governmental jurisdictions and local, state, and federal land and resource management agencies.

The Forest Reserve Act (1891), the Organic Administration Act (1897), and the Transfer Act (1905), has made the USDA Forest Service the responsible agency for managing lands owned by the federal government within the region. The White River National Forest comprises 80% of the land base in Summit County, 79% in Pitkin County, and 55% in Eagle County. The Bureau of Land Management is also responsible for the management of federal lands in all three counties.

The Homestead Act (1863) created the majority of the private lands within the region. Those lands are contained within the jurisdictions of three counties (Eagle, Pitkin, and Summit) and fifteen municipalities (Aspen, Avon, Basalt, Blue River, Breckenridge, Dillon, Eagle, Frisco, Gypsum, Minturn, Montezuma, Red Cliff, Silverthorne, Snowmass, and Vail). All of the counties and many of the municipalities share contiguous boundaries with the White River National Forest.

From 1990-1997 the region represented by Northwest Colorado Council of Governments experienced an average population increase of 31%, while the state average was 16.6%. The fastest growing counties in the region were Summit and Eagle with 44.1% and 44.7% increases recorded respectively. The population distribution is higher among the Interstate 70 counties with Eagle, Summit, and Pitkin counties accounting for 69% of the region's population. Summit County has a population density of 30.7 persons per square mile. Some of the fastest growing communities (1990 to 1997) in the region are:

- Silverthorne, 71% population increase
- Frisco, 64% population increase
- Basalt, 60% population increase

The Draft Environmental Impact Statement recognized the rapid growth of the region when it stated, *"Communities adjacent to the White River NF...*[have] *some of the highest growth rates in Colorado...Most of this growth has occurred near the Forest's ski areas. In the 1990s, these ski areas evolved into four-season resorts that attract visitors throughout the year. This change has greatly boosted employment in the tourism and commercial sectors of local economies, and has led to population growth throughout the area...many towns that historically served only the local ranching and farming population are experiencing rapid residential growth. This growth has been accompanied by an influx of retail and service businesses. In the same period, the area's scenic and cultural amenities have prompted the development of vacation homes, second homes, and golf courses. As private lands near the Forest are converted to these residential and*

commercial uses, the traditional agricultural economic base is increasingly being supplanted."[2]

The rapid population growth of the region is expected to continue into the foreseeable future. The estimated populations of counties within the region are[3]:

	1997	2010	2020
♦ Eagle County	35,309	52,611	62,336
♦ Pitkin County	15,840	20,671	24,343
♦ Summit County	20,810	33,458	41,591

In addition to growing local populations, the projected population estimate of the Denver Metro Area is predicted to increase by one million residents by the year 2020.[4] *"Ready access to the Forest by residents of Denver and other Front Range communities is provided by Interstate 70, which enters the Forest at the Eisenhower Memorial Tunnel…In terms of visitor recreation days, the White River NF ranked fifth in the nation in 1995."*[5] What will be the additional impacts of 3,000,000 Front Range residents on local governmental jurisdictions within the region in the context of urbanization?

Employment is growing very rapidly in Eagle and Summit Counties, and has been a major factor fueling the population growth in the region. Between 1990 and 1997, employment has grown faster than population in Eagle and Summit Counties. As a result it is estimated that approximately 6,100 workers currently commute into Summit County and 8,240 into Eagle County. Estimates show 8,700 workers commuting to Summit County in 2020 and 31,500 workers commuting to Eagle County in 2020.[6]

Development constraints such as surface water, wetlands, 30%+ slopes, and unstable soil conditions, make the remaining 20% of the private land base severely limited for providing all of the residential, commercial, parks, open space and infrastructure needs of a rapidly growing population.

One area that reflects the demand placed on the small percentage of available land is in housing prices. For example home values in Silverthorne increased 69% from 1992 to 1998, while Breckenridge housing increased 65% during the same time period.[7] Some communities such as Vail and Minturn are virtually landlocked by federally owned land.

The White River National Forest recognized urbanization as an issue topic in 1997 in the Analysis of the Management Situation (AMS). The document stated, *"The current Forest Plan does not address management of resources in the context of this topic* [urbanization]. *It is expected that growth in the planning area will continue throughout the period of revision. This will be coupled by anticipated increases in use of the Forest by visitors. The issues associated with this topic* [urbanization] *are expected to continue. In order to effectively manage the Forest in the future, it is necessary to consider the*

[2] Draft Environmental Impact Statement, White River national Forest, 1999.
[3] Demography Section, Colorado Division of Local Government, 1999.
[4] Population Study, Denver Regional Council of Governments, 1999.
[5] Draft Environmental Impact Statement, White River national Forest, 1999.
[6] Demography Section, Colorado Division of Local Government, 1999.
[7] Mountain Resort Area Cost of Living Study, Northwest Colorado Council of Governments, 1998.

impacts on both public and private lands. It is also necessary to consider the effects of development on private lands on the Forest. This will include goals and objectives and Forest-wide direction. Development of a management area prescription, allocation of some lands to that prescription, and monitoring of how well actions are achieving established goals and objectives will also be necessary...Most important will be the need to establish cooperative relationships with others to try to deal with issues beyond National Forest System lands."[8]

Urbanization is a topic that all governmental jurisdictions are facing in light of unprecedented population growth within the region and the Front Range. The WRNF identified urbanization as a separate issue topic in the Analysis of the Management Situation, but eliminated it as a separate topic and alternative in the DEIS. *"Opinions vary widely regarding the role the Forest should, or can, play in the urbanization of areas adjacent to NFS lands. This alternative* [Alternative H, Urbanization] *was dropped after extensive discussion because urbanization is not directly controlled by Forest Service management activities."*[9] NWCCOG agrees with the WRNF Analysis of the Management Situation, but disagrees with the WRNF conclusion in Summary of the Draft Environmental Impact Statement.

A plausible argument could be advanced that no governmental jurisdiction can directly control urbanization within its limited legal authorities. However, if this rationale were used by county and municipal jurisdictions in addition to the WRNF then urbanization and its effects on the region would not be addressed. It must be noted that it was the "management activity" of the Forest Service that created the Summit, Eagle, and Pitkin County ski areas and resulting resort economies through the issuance of special use permits. *"The Aspen Ski areas came first in the 1940s and 1950s, with Vail and the Summit County ski areas following in the 1960s. As the ski resorts grew, so did the communities near them."*[10]

The White River National Forest stated in its rationale to eliminate urbanization as a separate issue topic, *"Instead of serving as the theme of a Forest Plan alternative, social impact and effects (including urbanization) are considered to be environmental consequences of the alternatives considered in detail."*[11] The draft environmental impact statement examines the social and economic setting in terms of employment and labor income because *"It is appropriate…to use larger-scale estimates of socio-economic indicators anticipated throughout the planning period."*[12] Using those larger-scale estimates, the conclusions drawn by the White River National Forest are:

1. *"…the relative importance of NFS recreation use and commodity outputs to the economy is shrinking. And,*
2. *"…growth apart from Forest-related tourism will be in industries and occupations yielding much larger earnings and profits."*[13]

[8] Analysis of the Management Situation, White River National Forest, 1997.
[9] Summary of the Draft Environmental Impact Statement, White River National Forest, 1999.
[10] Draft Environmental Impact Statement, White River national Forest, 1999.
[11] Ibid.
[12] Ibid.
[13] Ibid.

NWCCOG believes that the conclusions may be accurate, that the Forest Service is constrained in 36 CFR 219 in its ability to directly deal with urbanization, and that the economy of the region includes an increasing number of economic sectors not directly associated with Forest outputs. However, the term "urbanization" was not defined in any of the documents, was virtually eliminated from the text and does not even appear in the Glossary of Terms in Appendix K. NWCCOG finds it difficult to understand how the pervasive regional issue of urbanization was transformed from a separate revision issue topic in the Analysis of the Management Situation to an amorphous consideration inexplicably linked to the indicators of employment and income in the environmental consequences in the Draft Environmental Impact Statement. NWCCOG believes that the agency has abdicated its leadership role as the responsible agency for the majority landowner within the region in dealing with a primary regional issue.

For example, the Colorado Intermountain Fixed Guideway Authority (CIFGA) is proposing a high speed fixed guideway transportation system from Denver International Airport to Eagle County Airport. The project, a direct response to increasing growth and urbanization, will involve multiple county and municipal governments and state and federal agencies. Much of the right-of-way for the system will directly involve the White River National Forest, yet the Proposed Revised Forest Land and Resource Management Plan is silent on the entire CIFGA topic. How will the WRNF collaborate with multiple jurisdictions regarding CIFGA? What type of multi-jurisdictional planning process will be employed to make the kinds of extra-jurisdictional decisions that must be made?

It is the position of NWCCOG that urbanization and its environmental, social, and economic impacts is the paramount regional issue topic that affects multiple governmental jurisdictions and must be addressed by working in cooperation and collaboration with one another. NWCCOG supports the position of the White River National Forest regarding urbanization when it stated, *"Most important will be the need to establish cooperative relationships with others to try to deal with issues beyond National Forest System lands."*[14] Current trends within the state of Colorado support the position of the WRNF. Several new multi-jurisdictional initiatives have been introduced in light of the urbanization issue:

- The Governor's office is encouraging multi-jurisdictional planning and dispute resolution as key components to the Smart Growth initiative. Recognition and reward of regional planning by multiple jurisdictions is also part of the initiative.
- Great Outdoors Colorado is encouraging multi-jurisdictional planning to address open space, preservation of agricultural lands, trails, environmental education and outdoor recreation.
- The State Legislature is considering several growth management bills that encourage cooperation between multiple county and municipal jurisdictions.

In addition to the state of Colorado, the USDA Forest Service is proposing new regulations that call for increased collaboration with local governments in national forest planning. One of the stated goals of the new regulations is to, *"...recognize and efficiently integrate national forest and grassland management into the broader geographic, legal, political, and social landscape within which national forests and*

[14] Analysis of the Management Situation, White River National Forest, 1997.

grasslands exist."[15] Northwest Colorado Council of Governments is supportive of the direction the Forest Service appears to be headed with the five goals stated in proposed section §219.2.

Therefore, NWCCOG proposes that the White River National Forest reexamine the urbanization topic in collaboration with multiple governmental jurisdictions within the region to fully assess the topic as it relates to all jurisdictions including the WRNF. The reexamination would include a multi-jurisdictional definition of the term "urbanization" and the identification of urbanization elements in addition to employment and labor income. The results of the multi-jurisdictional reexamination and resulting analysis should be used in the development of the Revised Land and Resource Management Plan for the White River National Forest, Final Environmental Impact Statement, and Record of Decision.

2. A multi-jurisdictional collaborative process must be established for the identification, planning, management, and monitoring of intermixed and or adjacent lands of other jurisdictions that are of concern to those jurisdictions.

"Public lands are intermingled with private lands to such an extent that ecosystem management for NFS lands must be tempered by other landowners' uses and objectives...Areas characterized by an interface between NFS lands and other public and private lands are managed to protect natural resources, provide compatible multiple uses, and maintain cooperative relationships between private landowners and other governments with jurisdiction...These areas are located along the borders of the Forest adjacent to other public and private lands. The private lands are usually undergoing pressure from urban and private residential development...Cooperative relationships are emphasized with other agencies and adjacent private landowners."[16]

The rapid growth of the region creates challenges to local governments in many areas; especially in the rural/urban intermix lands. Fire and police protection, water and sanitation, transportation, access to public lands and private in-holdings, forest insects and disease, trespass, and noxious weeds are a few of the challenges generated in the rural/urban interface. The challenges are expected to increase in future years.

The White River National Forest did identify some management areas on which to apply the intermix prescription (7.1):[17]

Alternative C (7,700 acres). Aspen area, Fryingpan River area, south of Edwards area.
Alternative E (900 acres). Vail area.
Alternative F (5,800 acres). Breckenridge area, Frisco area, Vail area.
Alternative I (4,200 acres). Breckenridge area, Aspen area.

The acreage of intermix prescription areas in Alternatives C, E, F, and I represent less than .05% of the total acreage of the Forest. Alternatives B and D (the identified preferred alternative) identify zero (0) acres of intermix prescription acres.[18] The

[15] Proposed changes to section §219.2, USDA Forest Service, 1999.
[16] Proposed Revised Land and Resource Management Plan, White River National Forest, 1999.
[17] Maps for the Draft Environmental Impact Statement, White River National Forest, 1999.
[18] Ibid.

General Biological Guideline for the Intermix Prescription states that *"Management activities are coordinated with other affected landowners."*[19]

NWCCOG supports the concept of identifying areas of wildland/urban intermix and developing management prescriptions for application in the identified intermix areas. However, NWCCOG believes that the Proposed Revised land and Resource Management Plan for the White River National Forest is deficient in several areas:

- Management Prescription 7.1 was developed to ensure that Forest Service management activities are coordinated with other affected landowners. Therefore, identifying zero acres in the preferred alternative on which to apply the prescription indicates that the Forest does not intend to coordinate management activities with affected landowners.
- NWCCOG believes that there are private lands within county and municipal jurisdictions, adjacent to NFS lands, that are experiencing pressures from urbanization, that have not been identified as wildland/urban intermix areas.
- The impacts of urbanization on acres within wildland/urban intermix areas transcend jurisdictional boundaries. However, the proposed plan only speaks to NFS lands, without a strategy to involve adjacent jurisdictions and landowners.

NWCCOG proposes the following process for collaboration with local governments regarding intermix lands:

The Forest Service must seek to provide early and continuous coordination with local governmental jurisdictions adjacent to or affected by the management of National Forest System lands. The responsible official must:

(a) Recognize the jurisdiction, expertise, and role of state and local governments as regulators, land managers, and representatives of state constituencies and local communities interested in or affected by uses of the National Forest System.
(b) Recognize the government-to-government relationship between local governments and the Federal Government.
(c) Consult with elected officials from each local governmental jurisdiction adjacent to or affected by the management of National Forest System lands throughout the planning process.
(d) In cooperation with local jurisdictions, establish a process for intergovernmental information exchange with local governmental jurisdictions adjacent to or affected by the management of National Forest System lands throughout the planning process.
(e) Develop, where appropriate and practicable, coordinated multi-jurisdictional land and resource management plans.
(f) Involve representatives from local governmental jurisdictions adjacent to or affected by the management of National Forest System lands in the monitoring and evaluation of implemented plans.
(g) Consider local jurisdictions' approved plans, regulations, data, and resource knowledge provided by local governmental representatives; and
(h) Consider local jurisdictions' concerns and suggestions when making decisions and provide documented rationale for the acceptance or rejection of those concerns and suggestions.

[19] Proposed Revised Land and Resource Management Plan, White River National Forest, 1999.

3. A collaborative process must be established to identify goals and objectives for multi-jurisdictional management actions that will strive to sustain community vitality and healthy ecosystems on a regional basis.

A stated goal of the USDA Forest Service is to, *"...build community relationships that sustain both community vitality and healthy ecosystems, plus enhance the quality of life."*[20] In addition, three main goals apply to the management of all National Forest System Lands: ensure sustainable ecosystems, provide multiple benefits for people within the capabilities of ecosystems, and ensure organizational effectiveness.[21] Finally, a stated forest-wide goal, which applies to all National Forests in the Rocky Mountain Region is, *"Cooperate with individuals and organizations, and local, state, tribal, and federal governments to promote ecosystem health and sustainability across landscapes."*[22] NWCCOG is in agreement with the conceptual linkages between healthy ecosystems and healthy communities through sustainability.

The WRNF is also aware that impacts on an ecosystem extend beyond the Forest's boundaries. The WRNF stated, *"Where multiple ownership exists in a watershed of any level, it is important that the Forest work with the appropriate agencies and individuals where necessary to protect the watershed."*[23] The WRNF went on to state, *"Cooperative relationships are emphasized with other agencies and adjacent private landowners."*[24] Ecosystems do not stop at the National Forest boundaries, but extend to lands of adjacent jurisdictions. However, NWCCOG questions the ability of the WRNF to manage its lands and achieve its stated goals without examining complete ecosystems. (The preferred alternative identified zero acres of intermix lands.) In addition, NWCCOG is concerned that there are no Forest-wide Standards and Guidelines specifically designed to address the Forest-wide Goal of *"Cooperate with ...local governments to promote health and sustainability across landscapes."*[25]

Although the glossary of terms prepared by the WRNF fails to define "health" or "sustainability" in relationship to communities, community health and vitality includes social and economic components. It is the belief of NWCCOG that the WRNF must consider several concepts and procedures:

- The management of National Forest System lands should promote economic and social sustainability through collaborative multi-jurisdictional, intergovernmental planning, plan implementation, and plan monitoring, involvement of interested and/or affected people, development and consideration of relevant social and economic information, and by providing a range of products, services, and values.
- In conducting broad-scale assessments or local analyses, the responsible official shall consider the best available information to consider social and economic factors.
- A social analysis shall describe potential consequences to communities and regions from land management changes in terms of capital availability, employment opportunities, wage levels, local tax bases, affects on existing approved plans of

[20] Rural Community Assistance, USDA Forest Service.
[21] Government Performance and Results Act, 1993.
[22] Proposed Revised Land and Resource Management Plan, White River National Forest, 1999.
[23] Draft Environmental Impact Statement, White River National Forest, 1999.
[24] Proposed Revised Land and Resource Management Plan, White River National Forest, 1999.
[25] Ibid.

adjacent and/or affected local jurisdictions, federal revenue sharing, the ability to support public infrastructure and social services, human health and safety, and other factors as necessary and appropriate.

- The responsible official must consult with elected officials from adjacent and/or affected local governments to define social sustainability for the community and region and identify the appropriate indicators to be monitored and by which to evaluate the achievement of desired conditions.
- The responsible official must consult with elected officials from adjacent and/or affected local governments to define regional and community health, vitality, and well being and identify the appropriate indicators to be monitored and by which to evaluate the achievement of desired conditions.
- The local economic and social analysis shall include participatory analyses which engage elected officials of adjacent and/or affected local governments and the public to enhance the understanding and development of realistic expectations.
- Analyses and decisions regarding social and economic sustainability are to be made at the appropriate planning level in a collaborative process with representatives from appropriate local governmental jurisdictions. Decisions made at subsequent levels must be consistent with higher-level decisions.

A key component of determining if the implemented management actions are achieving the desired stated outcome of the USDA Forest Service to, *"...build community relationships that sustain both community vitality and healthy ecosystems, plus enhance the quality of life"* is monitoring and evaluation. The proposed plan revision identifies the minimum legally required monitoring, *"36CFR 219.7(f) A program of monitoring and evaluation shall be conducted that includes consideration of the effects of national forest management on land, resources, and communities adjacent to or near the national forest being planned and the effects upon national forest management activities on nearby lands managed by other federal or other government agencies or under the jurisdiction of local governments."*[26]

Table 4-1 illustrates that legally required monitoring stated in 36CFR 219.7(f) *"... shall be measured in years 5 and 10, with precision and reliability standard B."*[27] (precision and reliability standard B includes communication and onsite ocular estimates as acceptable measurement tools.)

In direct response to 36CFR 219.7(f), NWCCOG recommends that the following monitoring question be added to Table 4-2: Have elected officials from adjacent local governments participated in planning of NFS lands where wildland/urban interface activities are causing concerns related to the sustainability of ecosystems, economies, or communities? In order to affirmatively respond to the suggested monitoring question, NWCCOG recommends the following collaborative monitoring process: Monitoring and evaluation of social and economic sustainability shall be conducted through a collaborative process with representatives from adjacent and/or affected local governmental jurisdictions and shall include periodic review of national, regional, and local supply and demand for products, services, and values. Special consideration should be given to those products, services, and values that the Forest Service and adjacent and/or affected local governmental jurisdictions are uniquely poised to provide. Monitoring should improve the understanding of the National Forest System and

[26] Ibid.
[27] Ibid.

adjacent and/or affected local governmental jurisdictions contributions to human wants and values and to social and economic sustainability.

In light of the rapidly growing populations of the region and the resulting urbanization, NWCCOG recommends that this monitoring question be measured every two years.

Therefore, NWCCOG proposes that the WRNF, working in collaboration with adjacent governmental jurisdictions, develop a continuing multi-jurisdictional decision level process, supported by specific Forest-wide Standards and Guidelines. The purpose of the intergovernmental process will be to address regional issues, including urbanization, and their effects on ecosystems, community vitality, and quality of life during the development of the Forest Plan Revision as well as the implementation and monitoring of the approved Forest Plan.

Conclusion

Although communities may share a common regional bond, they are in fact, unique. The uniqueness of communities must be understood in order to determine how health and sustainability is defined for each, as well as ways they contribute to the overall character and future of the region. Simply stated, unilateral one-size-fits-all approaches will not be appropriate for achieving healthy ecosystems and community vitality. Therefore, multi-jurisdictional collaborative approaches to land and resource management must be developed and employed. NWCCOG believes that by focusing on the three aforementioned areas, multi-jurisdictional collaborative relationships can be developed to address important region-wide issues, producing mutual benefits to the environment and communities of the northwestern region of Colorado.

Northwest Colorado Council of Governments, through its membership, wishes to thank White River National Forest Supervisor Martha Ketelle and Regional Forester Lyle Laverty for their availability and willingness to work with NWCCOG in the area of collaboration with local governments. Since the public release of the proposed forest plan revision and Draft Environmental Impact Statement in August 1999, Supervisor Ketelle and Regional Forester Laverty, and their respective staffs, have met with NWCCOG Board members and staff to discuss the concepts mentioned in this response. Their encouragement to NWCCOG to pursue a Rural Communities Assistance grant to develop a collaborative process gives encouragement that many of the concepts discussed in this response are of enough importance to both the Forest Service and local governments, that an effort to develop cooperation and collaboration is worthwhile pursuing.

Northwest Colorado Council of Governments also applauds the efforts of Representative Scott McInnis and Senator Ben Nighthorse Campbell to obtain extensions in the time period for public response. The additional response time afforded jurisdictional members of NWCCOG the necessary time to involve citizens, carefully review the proposal in its entirety, and begin constructive dialog with the Forest Service.

W3077

General Assembly
State of Colorado
Denver

February 21, 2000

Ms. Martha Ketelle, Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The members of the Joint Agriculture and Natural Resources Committee met recently with Regional Forester Lyle Laverty to discuss the revision of the White River Forest Management Plan. We would like to share with you our strong opposition to the management alternative identified as the preferred alternative in the draft environmental impact statement. We urge you to select an alternative which adheres to the primary purposes for which our national forests were established under the 1897 Organic Act, namely to assure a continuous supply of timber and preserve a plentiful supply of fresh water for public use. Our national park system, however, was created to preserve public lands and most activities such as mining and energy development are prohibited. We believe that the preferred alternative is an attempt to eliminate multiple uses of our forest lands and to create a second park system.

As you know, the economies of many of our western slope communities are dependent on the revenue derived from the use of forest lands. With over 35% of the total land area of the State in federal ownership, it is critical that we preserve our ability to harvest timber, develop mineral and energy resources, graze livestock, recreate and maintain our water supply. The preferred alternative would severely jeopardize the livelihood of these communities.

Specifically, the preferred alternative includes the intent of the Forest Service to require by-pass flows. The imposition of a by-pass flow requirement as a condition of a permit renewal is a regulatory taking of a water right, is not administrable and, most often, will not achieve its stated purpose – meeting instream flow needs.

The imposition of by-pass flow requirements will result in a loss in yield and an increase in the cost of yield to the permittee which amounts to a regulatory taking of a water right. In addition, once the Forest Service has taken the water to meet instream flow needs, the Forest Service will be unable to ensure that the water actually provides the intended benefit. Under Colorado law, a by-pass flow

W3077

requirement is not a legally recognized or administrable water right. A by-pass flow requirement imposed on a permittee may require that user to forego diversion, but the water by-passed becomes immediately available for diversion by a downstream junior water right owner, who is not otherwise entitled to divert.

As we learned on the Arapahoe and Roosevelt National Forest, a better approach is to work within Colorado water law to meet any identified stream flow requirements. We urge you to rewrite this section of the plan to indicate that the forest service intends to work within the State's water rights system and with the Colorado Water Conservation Board, the only entity in Colorado authorized to hold instream flow water rights to achieve management goals.

In addition, any management alternative ultimately selected for the White River National Forest must maintain the historical practice of harvesting timber to increase water yield whether for recreational, municipal environmental or other purposes in order to comply with the 1897 Organic Act. With variations in timber harvest among the alternatives ranging from 4.7 to 18.6 million board feet, significant variations in stream flows can be anticipated. These should be quantified and included in the analysis of alternative timber harvests and in selection criteria employed when choosing a preferred alternative.

With regard to timber harvesting, the preferred alternative fails to recognize timber supply as a primary purpose of the national forests, the value of timber harvesting to thwart devastating timber disease and as an important tool to preserve overall forest health and to prevent forest fires.

Sincerely,

Representative Diane Hoppe

Representative Steve Johnson

Representative Kay Alexander

Senator Dave Wattenberg

Senator Ken Chlouber

Representative Mark Larson

Representative Lola Spradley

Senator Gigi Dennis

Senator Rob Hernandez

Representative Brad Young

Representative Matt Smith

Senator Jim Dyer

Senator Mark Hillman

Representative Carl Miller

Representative L. Tochtrop

Representative Jack Taylor

c: Lyle Laverty

Representative Diane Hoppe
HOUSE OF REPRESENTATIVES
State Capitol - Room 271
Denver, CO 80203

M110101065

W3198

EXECUTIVE COMMITTEE
Sen. Ray Powers, Chairman
Rep. Russell George, Vice Chairman
Sen. Tom Blickensderfer
Sen. Michael Feeley
Rep. Doug Dean
Rep. Ken Gordon

STAFF
Charles S. Brown, Director
Daniel Chapman, Assistant Director, Administration
Deborah Godshall, Assistant Director, Research

COLORADO GENERAL ASSEMBLY

LEGISLATIVE COUNCIL

ROOM 029 STATE CAPITOL
DENVER, COLORADO 80203-1784
E-mail: lcs.ga@state.co.us
303-866-3521 FAX: 303-866-3855 TDD: 303-866-3472

COMMITTEE
Sen. Ken Chlouber
Sen. Gigi Dennis
Sen. Rob Hernandez
Sen. Doug Lamborn
Sen. Pat Pascoe
Sen. Bill Thiebaut
Rep. Bob Bacon
Rep. Dorothy Gotlieb
Rep. Steve Johnson
Rep. Shawn Mitchell
Rep. Lola Spradley
Rep. Abel Tapia

cc: RF DRF PR Plan Wm Rec

February 23, 2000

Lyle Laverty, Regional Forester
U.S. Forest Service
P.O. Box 25127
740 Simms Street
Lakewood, CO 80225

Dear Mr. Laverty:

The Joint Committee on Agriculture and Natural Resources is sending this letter in response to issues raised at your January 26, 2000, meeting with the committee. Specifically, we want to express our strong concerns about bypass flow requirements and road management issues on United States Forest Service lands in Colorado.

The White River National Forest Management Plan's Goal 1.10 concerning water quantity states that the forest will "acquire instream flow water rights or establish instream flow protection measures in special-use authorizations which protect 10 percent of all perennial streams." We respectfully urge you to delete from all forest management plans any reference to imposing bypass flow requirement. We oppose bypass flow requirements because we believe that these requirements are illegal, ineffective, and unfair. There are also less onerous and more effective means for protecting the environment including the state's Instream Flow Program. Following is an elaboration on each of these objections.

We agree with the findings of the Federal Water Rights Task Force of 1997 that the Forest Service does not have the authority to require bypass flows as a condition of special use permits. Also, federal law (the McCarran Amendment of 1952) requires the Forest Service to obtain water rights for federal uses and to administer these rights in priority with non-federal water rights. Bypass flow requirements ignore this law and circumvent Colorado's priority system.

W3198

Bypass flow requirements are an ineffective mechanism for protecting the environment because there is no guarantee that a bypass flow will ever reach its intended environmental beneficiary. Specifically, Colorado water law does not recognize a federally mandated bypass flow as a water right. Consequently, the State Engineer may not prevent the bypass flow from being diverted downstream by a water user who would not otherwise be entitled to the water. Effectively, a bypass flow requirement will only reallocate water from a senior water user to a junior water user. Bypass flow requirements are also unfair because the requirements are imposed only on special use permit holders. However, a water shortage may be caused by water users who are not required to obtain a special use permit.

The committee strongly urges the Forest Service to follow Colorado water law in the acquisition of instream flow appropriations for the streams that it wants to protect. Since 1973, the Colorado Instream Flow Program has been used to protect 8,000 miles of streams, many of which are located in the White River National Forest. Unlike a bypass flow requirement, an instream flow right is a legally recognized right that must be protected by the State Engineer.

We also urge the Forest Service to obtain the water that it needs by practicing sound forest management. Studies have determined that declining timber harvests and decades of fire suppression have caused a dangerously over-mature and dense forest. Consequently, these forests unnecessarily deplete large volumes of water that would otherwise contribute to stream flows. Selective timber harvests will provide additional water for the streams as well as provide good paying jobs, reduce fire hazards, and increase wildlife habitat.

Finally, the committee wishes to express our concern about the Forest Service's review of its road policies. We are concerned that this review may lead to a significant loss of motor vehicle access to the National Forests. This loss would come at a time when demand for off-highway recreation is at an all time high and growing in Colorado. We urge the Forest Service to pursue other methods of protecting the environment than closing large sections of a forest to motorized recreation. Specifically, re-construction of existing roads and re-routing of roads could be used to protect or avoid sensitive areas. Also, public education about road-use ethics may help minimize the impact from motorized recreation. The off-highway vehicle community has proven itself a willing partner in the protection of the environment. For example, this community imposed a $15.25 registration fee on itself to provide money for trail maintenance, trail ethics education, and safety program. We urge you to work with this community and the state Trails Program to help protect the resource and provide motorized recreation for our growing state.

Lyle Laverty
February 22, 2000
Page 3

W3198

Thank you for your attention to our concerns. Please contact me at (303) 866-3706 for additional information on any of these issues.

Very truly yours,

Senator Dave Wattenberg, Chairman
Senate Committee on Agriculture,
Natural Resources and Energy

Representative Brad Young, Chairman
House Committee on Agriculture,
Livestock, and Natural Resources

W3343

March 5, 2000

Forest Planning Team
White River National Forest
PO Box 948
Glenwood Springs, Colorado 81602

The Eagle County Commissioners
PO Box 179
Eagle, Colorado 81631

Gentlemen:

The Institute for Public Policy conducted a Colorado survey about a month ago, regarding the future of Colorado. More than 82 percent of the residents surveyed had concerns about growth. I think this sentiment would probably apply to most areas of the country, not just Colorado.

Those of us who live in Eagle County are among a small select population fortunate enough to have a National Forest as our backyard. We tend to forget that it is a National forest, and we think of it as OUR forest.

Unfortunately, to some that means this forest is OURS to do with what we please, whether for recreation, or for profit. There are those who selfishly feel that no one has the right to tell how to use, or abuse, this resource.

But as Eagle County residents, I feel we are also placed in the position of being caretakers for this Forest. It is our responsibility to make sure it is respected, and protected. It doesn't just belong to us, but to all future generations. It doesn't just belong to Colorado. It belongs to all people, even those who will never have the chance to see it, except for pictures in a John Fielder book, or on the Discovery Channel.

Millions of people drive through the White River National Forest each year, at 70 miles and hour, and may never even get out of their cars – they don't stop to ski, or hike, or snowmobile, or go 4-wheeling, or buy vacation condos. Yet they are still awed by the sight of one of the last remaining wilderness areas in the lower 48 states. This is their forest too. And we owe it to them to try to keep the 'wild' in 'wilderness' as long as we can.

Alternative D is a great starting point. It will help to protect wildlife habitats where needed, it will reduce erosion from illegal and irresponsible roadways, and yet it still allows for the responsible enjoyment of wilderness areas. The most vocal opponents – the ones who wish unregulated motorized access, or commercial development, probably represent such a small percentage of the overall national population, and should not be allowed to dictate the management of national wilderness.

W3343

Forest Planning Team
Eagle County Commissioners
Page two.

Colorado is a very special place – Colorado's wilderness, much of which is national forest, provides the backdrop that has created the rich quality of life which has attracted visitors and residents from all around the world. If we lose this quality of open space and wilderness, we essentially lose our identity, and our heritage.

Admittedly, I have disagreed with many of President Clinton's ideas and issues, however I could not concur more with his Memorandum for the Secretary of Agriculture, dated October 1999, in which he states:

> "Too often, we have favored resource extraction over conservation, degrading our forests and the critical natural values they sustain. As the consequences of these actions have become more apparent, the American people have expressed growing concern and have called on us to restore balance to their forests".
>
> "In weighing the future of these lands, we are presented with a unique historic opportunity. From the Appalachian Mountains to the Sierra Nevada, these are some of the last, best unprotected wild lands in America. They are vital havens for wildlife – indeed, some are absolutely critical to the survival of endangered species. They are a source of clean, fresh water for countless communities. They offer unparalleled opportunities for hikers, campers, hunters, anglers, and others to experience unspoiled nature. In short, these lands bestow upon us unique and irreplaceable benefits. They are a treasured inheritance – enduring remnants of an untrammeled wilderness that once stretched form ocean to ocean". – William J. Clinton

To be influenced by the recent scare tactics and misinformation being issued by local opponents, and by those who exploit the forest for monetary gain, would be short-sighted and counter-productive. I urge you to work with the guidelines set forth by Alternative D, and to reach a responsible solution that will forever protect OUR White River National Forest.

Sincerely,

Dave Jones
PO Box 1596
Vail, Colorado 81657

W3432

Northwest Colorado Council of Governments
P.O. Box 2308 · 249 Warren Ave. · Silverthorne, CO 80498 · 970-468-0295 · Fax: 970-468-1208 · www.nwcog.co.us

March 8, 2000

MEMBER JURISDICTIONS
EAGLE COUNTY
Avon
Basalt
Eagle
Gypsum
Minturn
Red Cliff
Vail
GRAND COUNTY
Fraser
Granby
Grand Lake
Hot Sulphur Springs
Kremmling
Winter Park
JACKSON COUNTY
Walden
PITKIN COUNTY
Aspen
SUMMIT COUNTY
Blue River
Breckenridge
Dillon
Frisco
Montezuma
Silverthorne

Forest Planning Team
White River National Forest
P.O. Box 948
Glenwood Springs, Colorado 81602

Please accept the following comments to the Proposed Revised Land and Resource Management Plan for the White River National Forest as an addendum to the response submitted to the Forest Planning Team on January 28, 2000 by Northwest Colorado Council of Governments (NWCCOG).

Sincerely,

Gary J. Severson
Executive Director

CC: Lyle Laverty, Regional Forester, USDA Forest Service, Rocky Mountain Region
Scott McInnis, United States Representative, 3rd District, Colorado
Wayne Allard, United States Senator, Colorado
Ben Nighthorse Campbell, United States Senator, Colorado

W3432

Standards and Guidelines

Goal 3.4, **Public and Organizational Relations** (p. 1-10 Proposed Revised Land and Resource Management Plan) states, "Cooperate with individuals and organizations, and local, state, tribal, and federal governments to promote ecosystem health and sustainability across landscapes." NWCCOG suggests the following wording (changes in bold type):

> *Cooperate with individuals and organizations, and local, state, tribal, and federal governments to promote ecosystem **and community** health and sustainability across landscapes.*

The three stated objectives to support Goal 3.4 do not include local governmental jurisdictions in any cooperative process other than for the control of noxious weeds. Therefore, NWCCOG suggests the following additional objective to support Goal 3.4:

> *Provide a specific process for local governmental jurisdictions to participate in planning and management of NFS lands, especially where local governmental jurisdictions are contiguous to NFS lands.*

The Proposed Revised Land and Resource Management Plan is devoid of any standards or guidelines to ensure cooperation with local governments in the achievement of Goal 3.4. Therefore, NWCCOG proposes the following standards and guidelines:

STANDARDS

1. *Consult with elected officials from each local governmental jurisdiction adjacent to or affected by the management of National Forest System lands throughout the planning process.*
2. *In cooperation with local jurisdictions, establish a process through a Memorandum of Understanding for intergovernmental information exchange with local governmental jurisdictions adjacent to or affected by the management of National Forest System lands throughout the planning process.*
3. *Acknowledge local jurisdictions' approved plans, regulations, data, and resource knowledge provided by local governmental representatives.*
4. *Involve representatives from local governmental jurisdictions adjacent to or affected by the management of National Forest System lands in the monitoring and evaluation of implemented plans.*

GUIDELINES

1. *Consider the jurisdiction, expertise, and role of state and local governments as regulators, land managers, and representatives of state constituencies and local communities interested in or affected by uses of the National Forest System.*
2. *Recognize the government-to-government relationship between local governments and the Federal Government.*

Addendum to the NWCCOG Response to the Proposed Revised Land and Resource Management Plan for the White River National Forest

W3432

3. *Develop, where appropriate and practicable, coordinated multi-jurisdictional land and resource management plans.*
4. *Consider local jurisdictions' concerns and suggestions when making decisions and provide documented rationale for the acceptance or rejection of those concerns and suggestions.*

Management Prescription 7.1 - Intermix

NWCCOG agrees with the Theme and Management Area Description of management prescription 7.1- Intermix (p. 3-70, Proposed Revised Land and Resource Management Plan). However, NWCCOG proposes the additional wording to the last paragraph of the Desired Condition (changes in bold type):

> *Cooperative relationships are emphasized with other agencies, **local governmental jurisdictions**, and adjacent private landowners **to identify areas of intermixed lands, regardless of jurisdiction, in need of coordinated multi-jurisdictional management approaches to address resources and/or impacts that transcend the national forest boundary.***

The standards and guidelines for management prescription 7.1 (p. 3-70 and 3-71, Proposed Revised Land and Resource Management Plan) do not contain a category for Public and Organizational Relations that would address Goal 3.4. Therefore, NWCCOG proposes a category of standards and guidelines for management prescription 7.1 entitled ***Public and Organizational Relations*** containing the following Standards and Guidelines:

STANDARDS

1. *Consult with elected officials from each local governmental jurisdiction adjacent to National Forest System lands to identify intermixed lands of concern to those jurisdictions.*
2. *Acknowledge local jurisdictions' approved plans and regulations provided by local governmental representatives.*

GUIDELINE

1. *Develop, where appropriate and practicable, coordinated multi-jurisdictional land and resource management plans.*

W3553

March 15, 2000

United States Forest Service
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 81601

Re: White River Forest Management Plan

Ladies and Gentlemen:

For inclusion in the official public comments regarding all proposed White River Forest Management Plans, please find enclosed Resolution No. 2000-6, unanimously passed by the Glenwood Springs City Council on March 2, 2000.

As I understand it, this one copy to you will suffice to be included in the Plans; however, if that is not correct, kindly let me know and I will be happy to forward copies to whomever you direct.

Thank you for your cooperation and assistance. Please let me know if you have any questions or concerns.

Sincerely,

Robin S. Clemons, CMC
City Clerk

Encl:

806 COOPER AVENUE GLENWOOD SPRINGS, COLORADO 81601 970/945-2575 FAX: 945-2597

W3553

RESOLUTION NO. 2000-6

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GLENWOOD SPRINGS, COLORADO, OBJECTING TO PROVISIONS OF THE CURRENT AND ALL PROPOSED WHITE RIVER FOREST MANAGEMENT PLANS AFFECTING THE CITY'S WATER RIGHTS.

WHEREAS, the U.S. Forest Service has proposed several alternative forest management plans for the White River Forest near the City of Glenwood Springs; and

WHEREAS, specifically, Goal 1.10 and Objective 1.10 of the proposed plans states the following:

"Goal 1.10 - Water Quantity.
Provide instream flows that support the achievement and maintenance in perpetuity of those federal purposes for NFS lands (i.e., safe drinking and swimming, aquatic life and habitat, recreation and aesthetics, and the natural conveyance of water and sediment) that depend on such flows.

Objective 1.10 - By the end of the plan period, acquire instream flow water rights or establish instream flow protection measures in special use authorizations which protect 10% of all perennial streams."

WHEREAS, representatives of the U.S. Forest Service have stated that one "instream flow protection measure" that may be used is to impose bypass flow requirements in special use permits; and

WHEREAS, should such bypass flows be required, they could directly reduce the City's municipal water supply by 1.983 acre-feet (646,163 gallons) per day for each 1 cfs of bypass flow requirement; and

WHEREAS, such reduction is the approximate equivalent to the annual water needs of seven hundred and twenty-five (725) families of four (4); and

WHEREAS, such reductions are serious and substantial, as they affect the City's main source of municipal water.

NOW, THEREFORE, IT IS RESOLVED BY THE CITY COUNCIL OF THE CITY OF GLENWOOD SPRINGS, COLORADO, THAT:

Section 1. All alternatives of the White River Forest Management Plan, as currently proposed by the U.S. Forest Service, will, as interpreted by Forest Service representatives during

the public hearing process, adversely affect the City of Glenwood Springs' municipal water supply. Therefore, the City strongly objects to all proposed plans, such objection being based on the following:

1. The Forest Service has no independent statutory authority to imposed bypass flows through a Forest Plan, and the legislative history favors protection of existing uses and existing water rights.

2. Colorado has a model program for state acquisition of instream flow rights that has established instream flows on over 1,000 miles of streams within the White River National Forest. The program has worked for nearly three (3) decades and continues to work without imposition of Forest Service bypass flows or a federal instream flow right. Therefore, the imposition of bypass flows is unnecessary, especially on those streams, such as Grizzly and No Name Creeks, which are already protected by state instream flow decrees.

3. The City of Glenwood Springs depends, for its water supply, on a system constructed approximately 100 years ago in the White River National Forest. The City has always complied with its Special Use Permit and has operated its system in a manner that is protective to the environment. Recently the City committed five million dollars ($5,000,000) for necessary repairs and upgrades to that system. During the last year, the City spent over two million dollars ($2,000,000) in emergency repairs to the diversion and conveyance structures. These repairs and upgrades were necessary to preserve the water supply of the City and the health and safety of its citizens. The repairs were done in cooperation and close consultation with the local office of the Forest Service and were competed with a minimal disturbance to the environment. The Forest Service should not place the City in the untenable position of either neglecting needed repairs to its diversion and conveyance system constructed on National Forest land or abandoning a portion of the City's valuable and long-held water rights as a condition of a special use permit.

4. The Forest Service should rewrite Goal 1.10 and Objective 1.10 to state that the Forest Service will work within Colorado water law and accept state instream flow decrees as satisfying Objective 1.10. Moreover, the Forest Service should recognize that there are non-flow alternatives that would accomplish the stated goal of ensuring "flows that support the achievement and maintenance in perpetuity of those federal purposes for NFS lands that depend on such flows". Examples of such alternatives are creating pools, riffles, and fish habitat structures that will function under various flow conditions. Such alternatives allow for continued or expanded use of the Forest Service resources without diminishing the environmental values associated with healthy streams and rivers. In addition, under state law, a municipality has the authority to designate a watershed protection area within a five mile radius of its raw water intake, C.R.S. 31-15-707(1)(b). The Forest Service could encourage the use of this authority and implementation of non-flow alternatives in lieu of imposition of bypass flow requirements.

Section 2. The City Clerk shall forward a copy of this resolution to the Forest Service, prior to May 9, 2000, for inclusion in the official public comments regarding all proposed White River Forest management plans.

INTRODUCED, READ AND PASSED THIS 2ND DAY OF MARCH, 2000.

CITY OF GLENWOOD SPRINGS, COLORADO

Robert J. Zanetta, Mayor Pro Tem

ATTEST:

Robin S. Clemons, City Clerk

DIANA DEGETTE
1ST DISTRICT, COLORADO
1339 LONGWORTH
WASHINGTON, DC 20515
202-225-4431
FAX 202-225-5657
DISTRICT OFFICE:
1400 GLENARM PLACE, SUITE 202
DENVER, CO 80202
303-844-4988
FAX 303-844-4996
E-mail: degette@mail.house.gov

COMMERCE COMMITTEE
SUBCOMMITTEE ON HEALTH AND ENVIRONMENT
SUBCOMMITTEE ON FINANCE AND HAZARDOUS MATERIALS
SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS

Congress of the United States
House of Representatives
Washington, DC 20515–0601

November 18, 1999

W3555

Mr. Lyle Laverty
Regional Forester
USDA Forest Service
Box 25127
Lakewood, CO 80225

Dear Mr. Laverty,

I am writing to express my support for the United States Forest Service focus on preservation in the recently released White River National Forest Land and Resource Management Plan. This spectacular forest spanning the I-70 corridor from Dillon to Rifle, has been impacted tremendously as our state has seen unprecedented economic and population growth.

The impact of this growth and the changing priorities of Coloradoans towards our National Forests must be reflected in Forest Management Plans. The forest is not served by being nostalgic about diminishing 19th century extractive uses. Rather, our national forests must to be managed to reflect 21st century priorities such as recreation, tourism, and wildlife habitat preservation. Today, more of Colorado's land is used for recreational activities like hiking, fishing and hunting than logging or mining. While communities continue to rely on Forests for economic support, timber receipts and mining claims are just a portion of that economy. Carefully managed trails for hiking and hunting, healthy ecosystems for wildlife, and clean and dependable water supplies contribute significantly to these local economies.

I commend you for including many of these 21st century values in the draft White River National Forest Plan. In particular, the emphasis on protecting wildlife habitat and the commitment to address the issue of forest road closures are the right steps towards more ecologically sustainable management of our national forests. Moreover, the renewed commitment towards preserving forest lands as wilderness is also important. As you know, the White River National Forest includes several areas included in the Colorado Wilderness Act of 1999, which I introduced this year, including Thompson Creek, Deep Creek, and the Flat Tops Additions. It is important these areas are managed as wilderness until such time that the US Congress can formally provide the Wilderness protection they deserve.

PRINTED ON RECYCLED PAPER

Finally, I recognize that the White River National Forest plan is not without its problems and I urge you to consider the diverse public comments from the varied users of the forest to make this the best Forest plan it possibly can be. However, any further delay or extension of the comment period on the White River National Plan land use plan is a disservice to those who have already commented on the plan as well as unnecessary intrusion on the Congressionally mandated Forest Service planning processes.

I look forward to working with you to ensure that our forests are managed to reflect the promise of the new millennium and remain viable for our future generations to enjoy.

Sincerely yours,

Diana DeGette
Member of Congress

DIANA DeGETTE
1st District, Colorado
1339 Longworth
Washington, DC 20515
202-225-4431
FAX 202-225-5657
DISTRICT OFFICE:
1400 Glenarm Place, Suite 202
Denver, CO 80202
303-844-4988
FAX 303-844-4996
E-mail: degette@mail.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515–0601

COMMERCE COMMITTEE
Subcommittee on Health and Environment
Subcommittee on Finance and Hazardous Materials
Subcommittee on Oversight and Investigations

W3555

Statement of Congresswoman Diana DeGette
to the
US Senate Committee on Energy and Natural Resources
Subcommittee on Forests and Public Land Management

Members of the Committee, thank you for allowing me to provide comments for today's hearing on the White River National Forest. I am hopeful the hearing will serve to educate the public about many of the changing conditions and priorities on our National Forests and the visionary steps the White River National Forest is undertaking to bring forest management into the 21st century.

The White River National Forest is a spectacular forest spanning along the I-70 corridor from Dillon to Rifle, Colorado. It contains the soaring peaks of the Gore Range and the roaring precipice of Glenwood Canyon and the Colorado River. Like many areas in the West, the White River National Forest and its surrounding communities are currently experiencing a tremendous amount of change. Once small mining and ranching communities surrounded by public land have now evolved into world class destination resorts, providing year around recreation. Other parts of the State of Colorado have also seen tremendous economic and population growth, bringing in thousands of new citizens, many of them relocating because of Colorado's stunning natural environment and recreational opportunities.

The increased population and growing communities have placed new pressures and impacts on our National Forests and the natural ecosystems that sustain the forest. The White River National Forest has recognized these pressures and changing priorities of Coloradoans towards National Forests by proposing a visionary Forest Management Plan.

This Forest Plan is radical only in that it is not nostalgic about diminishing 19th century extractive uses of the forest, but attempts to manage the forest to reflect 21st century priorities such as recreation, tourism, and wildlife habitat preservation. Today, more of Colorado's land is used for recreational activities like hiking, skiing, fishing and hunting than logging or mining. While communities continue to rely on Forests for economic support, timber receipts and mining claims are a small portion of that economy. Carefully managed trails for hiking and hunting, healthy ecosystems for wildlife, and clean and dependable water supplies contribute significantly to these local economies.

The White River Forest Plan attempts to turn a new page in the history of our public lands by proposing a management plan that balances the needs and values of wildlife and

PRINTED ON RECYCLED PAPER

W3555

ecosystems with human uses of the forest, while providing the economic base still needed by local communities.

To accomplish this the White River Forest plan proposes several common-sense steps to address the changing needs of the forest. First, it proposes to limit motorized and mechanized recreation to designated trails and routes. Recreation has become a huge use of the forest, so much so that in many areas we are loving our forests to death causing grave and permanent environmental damage. By focusing recreation onto routes and trails where it's impacts can be minimized and rehabilitating damaged areas, we can preserve the forest so future generations can enjoy the forests in an even better condition then we see them today.

Second, the Forest plan proposes to address some of the growth pressures from ski areas by allowing areas to expand within existing permit boundaries. This allows room for growth while limiting some of the off site impacts associated with the expansion of ski areas in the last few years.

Third, the renewed commitment towards preserving forested lands as roadless areas and wilderness is also important. Roadless and wilderness areas provide important undisturbed habitat for wildlife as well as areas of solitude for humans. The White River National Forest includes several areas included in the Colorado Wilderness Act of 1999, which I introduced this year, including Thompson Creek, Deep Creek, and the Flat Tops Additions. It is important these and eligible roadless areas are managed as wilderness until such time that the US Congress can formally provide the Wilderness protection they deserve.

These common sense steps by the Forest Service should be commended. Instead of relying on dated views of how forests were managed, the White River National Forest has proposed modern solutions to existing issues occurring on our public lands.

I am concerned that this hearing is being held miles away from Colorado and within the current expanded public comment period for the White River National Forest plan. To date, the Forest Service has held numerous public hearings and meetings, providing a multitude of opportunities for the public to give input and express their views. It is important the public process now underway be allowed to progress. I hope that the purpose of this hearing is not to further delay finalizing a White River National Forest management plan or to interfere with on going public comments. This would be a disservice to those who have already commented on the plan as well as unnecessary intrusion on the Congressionally mandated Forest Service planning processes.

Thank you for the opportunity to comment for this hearing. I look forward to working with all of you to ensure that our National Forests are managed to reflect the promise of the new millennium and remain viable for our future generations to use and enjoy.

W3692

March 7, 2000

THE CITY OF ASPEN
OFFICE OF THE MAYOR

Lyle Laverty, Regional Forester
United States Forest Service
Rocky Mountain Regional Office
P.O. Box 25127
Lakewood, CO 80225-0127

Dear Lyle:

It was nice to meet you at the Club 20 meeting last week. I wanted to make sure that you have a copy of the Pitkin County/City of Aspen joint comments on the White River National Forest plan. As I mentioned, I had a possible idea to address the impasse with the state over the bypass flow issue.

Perhaps the R.O.D. could create a joint Forest Service/Water Conservation Board/Department of Natural Resources review process to re-examine and update as needed the existing minimum stream flows. I do not think the minimum stream flows have been reviewed since first established to determine their adequacy in preserving aquatic life and fisheries. If the Water Conservation Board and Colorado Department of Natural Resources agreed to such a review/study, I would suggest that it be given a definitive start and finish time frame such as two years. I would also suggest that the R.O.D. commit to seek federal funding as a resource to buy senior water rights as may be needed to augment minimum stream flows if the review should find deficiencies in today's standards.

Thanks for all your work.

Rachel Richards, Mayor
City of Aspen

CC: Martha Ketelle

C:\home\word\wrfn letter mcinnis2.doc
130 SOUTH GALENA STREET · ASPEN, COLORADO 81611-1975 · PHONE 970.920.5199 · FAX 970.920.5119
Printed on Recycled Paper

MEMORANDUM

W3692

TO: Mayor and Council

THRU: Steve Barwick, City Manager

FROM: Lee Cassin, City Environmental Health Director MEC

DATE: February 8, 2000

RE: Resolution Adopting Council Comments on White River National Forest Management Plan

---

SUMMARY: The attached resolution adopts the comments on the White River National Forest (WRNF) Management Plan developed by the Aspen City Council and Board of County Commissioners at several recent work sessions.

PREVIOUS COUNCIL ACTION: The Aspen City Council and Board of County Commissioners have met during three work sessions to craft joint comments on the WRNF proposed management plan revisions.

DISCUSSION: The attached comments address several issues in detail. Some of these include:

- management of roadless areas and road closures
- allowing for reasonable expansion of the visitor economy while recognizing that only limited growth is sustainable if we are to preserve the natural features that support the economy
- requesting that the Forest Service purchase all private inholdings on Forest lands in Pitkin County as quickly as possible
- better assessing socioeconomic impacts from activities on Forest lands
- requesting a land swap to create affordable housing at the in-town Forest Service Site
- recommending an improved approach to carnivore habitat improvement
- supporting efforts to separate conflicting uses
- designating appropriate locations for motorized and non-motorized uses
- growth of recreation on Forest lands and its impacts on towns and counties

RECOMMENDATION: Staff recommends that Council adopt the attached resolution.

PROPOSED MOTION: "I move to approve Resolution # 15 Series of 2000 adopting the attached comments on the White River National Forest management plan revisions."

CITY MANAGER COMMENTS: _____

RESOLUTION # 15
(Series of 2000)

W3692

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ASPEN, COLORADO, ADOPTING COMMENTS ON THE WHITE RIVER NATIONAL FOREST DRAFT FOREST PLAN, DRAFT ENVIRONMENTAL IMPACT STATEMENT, AND TRAVEL MANAGEMENT PLAN

WHEREAS, the United States Forest Service has proposed updated management plans for the White River National Forest, including a Preferred Alternative (Alternative D), and the City of Aspen wishes to comment on these plans during the official comment period, and

WHEREAS, the City Council of the City of Aspen has jointly with the Pitkin County Board of County Commissioners conducted public meetings and solicited input from as wide a range of forest users as possible, and wishes to make joint comments with Pitkin County, as described in the attached letter, and

WHEREAS, the City Council wishes to suggest improvements to the proposed plans, including better assessing socioeconomic impacts of activities on Forest lands, requesting that the Forest Service purchase all private inholdings on Forest lands in Pitkin County as quickly as possible, requesting a land swap to create affordable housing for local employees, recommending an improved approach to carnivore habitat improvement, supporting efforts to separate conflicting uses, and allowing for reasonable expansion of the visitor economy while recognizing that only limited growth is sustainable if we are to preserve our natural heritage,

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ASPEN, COLORADO:

The City Council of the City of Aspen hereby approves and adopts the attached letter and comments on the proposed changes in management plans for the White River National Forest.

Dated: 2/15/00

Rachel E. Richards, Mayor

I, Kathryn S. Koch, duly appointed and acting City Clerk do certify that the foregoing is a true and accurate copy of that resolution adopted by the City Council of the city of Aspen, Colorado, at a meeting held February 14, 2000.

Kathryn S. Koch, City Clerk

W3692

February 3, 2000

Martha Ketelle
Supervisor, White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Martha:

Thank you for allowing Pitkin County and the City of Aspen to provide comments on the Draft Forest Plan (DFP), Draft Environmental Impact Statement (DEIS), and Travel Management Plan (TMP) for the White River National Forest. Since about 80% of Pitkin County is managed by the federal government, decisions regarding federal land use have a direct impact on the quality of life and economy of our region. Integrating Forest Service, City, and County policies across jurisdictional lines is our only hope to achieve common goals and objectives.

The following comments are based on hundreds of hours of staff and consultant time spent reading the draft documents, meeting with Forest Service staff, attending meetings, and developing recommendations. We applaud the level of effort that has gone into the planning and public process. All governments struggle to develop adequate public involvement efforts and transparent planning processes and we recognize the effort which the staff of the White River National Forest has made. The process, which has been fair and open, has resulted in a Preferred Alternative which "cares for the land and serves the people".

The Aspen City Council and Pitkin County Board of County Commissioners wish to express their general support for Preferred Alternative (Alternative D) in the DEIS and the proposed TMP (see attached resolutions in Appendix 1). Alternative D allows for reasonable expansion of the visitor economy while recognizing that only limited growth is sustainable if we are to preserve our natural heritage. In addition, every level of government is faced with increasing demands for services and constrained spending. It is prudent to constrain growth in roads and developed recreation to expected budget levels.

We have specific concerns with the draft documents, which can be corrected in the Final EIS. Our comments are related to the following areas:

- Prescriptions in selected management areas
  We will point out problems with proposed prescriptions and offer an alternative.
- Proposed wilderness designations
  We will identify areas which should receive additional consideration.
- Socioeconomic impacts

W3692

We will recommend an approach for better assessing and addressing impacts of activities on Forest lands.

- Employee housing
  We will request that a land swap to create affordable housing for Forest Service and local employees be included in the Forest Plan.
- Inholdings
  We will suggest that "inholdings" were not well addressed in the Forest Plan and recommend that federal funds be used to acquire every available inholding in Pitkin county.
- Wildlife- Carnivore Habitat
  We will recommend another approach to meeting carnivore habitat improvements which will not require new roads or clear cutting in every instance.

We have organized our comments in three sections to match the three primary documents under review- the DFP, DEIS, and TMP. We have focused our comments on Alternative D based on Forest Service comments that the FEIS would focus on a revised Alternative D.

Thank you again for inviting our comments. We have worked closely with the Town of Snowmass Village and Aspen Skiing Company and feel that our comments will be consistent and complimentary to their comments. Our staff is prepared to work with Forest Service staff in order to resolve these issues during the preparation of the FEIS. If you have any questions regarding these comments, please contact Ellen Sassano at 970-920-5098.

Sincerely,

W3692

Pitkin County Board of County Commissioners

Shelley Roy Harper
Chairperson

Patti Clapper

Dorothea Farris

Mick Ireland

Leslie Lamont

Aspen City Council

Rachel Richards
Mayor

Tony Hershey

Jim Markalunas

Tom McCabe

Terry Paulson

cc: Lyle Laverty, Regional Forester

WHITE RIVER DRAFT FOREST PLAN COMMENTS

The following comments are directed toward the Draft Forest Plan and accompanying Land and Resource Management Plan map. Comments in this section follow a citation from the draft document.

AIR QUALITY (Page 2-3)

Standard: *1. Meet state and federal air quality standards, and comply with local, state and federal air quality regulations and requirements, either through original project design or through mitigation, for such activities as prescribed fire, ski area development or expansion, mining, and oil and gas exploration and production.*

Comment: The Aspen area is listed as a Non-Attainment area from the Clean Air Act. The movement of skiers and other recreation users to and from Forest Service recreation sites exacerbates our PM-10 problems. PM-10 is a proven hazard to the health of area residents and visitors. The City and County spend over $10,000,000 each year on public transportation in an effort to minimize the impact of transportation on air quality. Last year, over 700,000 visitors were moved to and from Forest Service permitted ski areas. In addition, over 80,000 visitors were transported to the Maroon Bells by RFTA bus.

The City and County strongly support the Forest Service direction of constraining future ski area development to currently permitted areas. While the Plan must provide some flexibility for permit adjustments that allow for minor improvements to existing ski areas, new ski areas, particularly those which are not adjacent to downtown areas, will encourage additional automobile travel and pollution. The same concern applies to non-skiing developed recreation. Future recreation activities will need to be accessed by non-motorized means or with transit.

WATER QUALITY (Page 2-5)

9. Maintain enough water in perennial streams to sustain existing stream health. Return some water to dewatered perennial streams when needed and feasible (WCP Handbook).

Comment: As the skiing has evolved from a series of family-owned ski areas to a four-season, recreation and development industry, the reliance on snowmaking has increased exponentially. Visitors are now guaranteed skiing in November regardless of natural conditions. While there are economic benefits to snowmaking, removing water from streams during this low flow season increases danger to flora and fauna in the area.

A policy and implementing Standard for discouraging additional snowmaking based on seasonal stream flows is recommended. Any future expansion of snowmaking would be encouraged to use groundwater or stream flows which have been captured during high stream flow periods. Seasonal flows would be

permitted if other options are not viable or were previously approved. Approvals for any additional snowmaking should incorporate a drainage and erosion control plan to address the added water content to soils.
The City and County are also concerned about possible water quality damage from construction of new roads to service timber cuts.

ADMINISTRATIVE (Page 2-34)

3. Opportunities to convey lands should consider the following:

- *lands in developed areas that have lost or are losing their national forest character*
- *lands within, and immediately adjacent to, expanding communities to assist public and private projects that have the mutual concurrence of federal, state, and local governments*
- *to states, counties, cities, or other federal agencies when disposal will serve a greater public interest*
- *lands that will contribute to community growth, development, and economic prosperity*

Comment: Two of the most critical issues facing our community are affordable housing and transportation. During the last decade and next decade, over $400 million in local, state, and federal funding will be spent in an effort to address these issues. Affordable housing is a national issue which is particularly acute in our community. The average single family home in the Aspen area sells for over $2 million. Like many other resort communities, workers have been priced out of the free market and rely on government-subsidized or deed-restricted housing units to avoid long commutes.

Those who purchase homes in distant communities face long commutes and generate the need for additional highway capacity. Additional traffic exacerbates air quality problems and creates the need for heavily subsidized parking facilities. For that reason, Pitkin County, the City of Aspen, and Town of Snowmass Village agreed in 1995 to limit traffic into Aspen to the level in 1994.

The current Aspen District Forest Service office is an ideal location for a land swap which meets the criteria above. The current site requires visitors who are seeking Forest Service information to drive into the most congested area of Aspen and then return to their desired destination. While less than ideal for an office, the site would be excellent for affordable housing. Conversely, relocation of the Forest offices to the Brush Creek site provides significant air quality benefits and better service to Forest users. The site provides a more direct transit hub to the Snowmass and Maroon Bells areas and the opportunity to significantly upgrade visitor facilities.

Pitkin County and the City of Aspen have approached the Forest Service to propose a land swap to facilitate affordable housing and mitigate transportation issues. Land at the

intersection of Brush Creek Road and Highway 82 would be exchanged for the 7th and Main site. The Brush Creek site would provide improved access for visitors and the potential for Forest Service employee housing. We request that the Forest Plan embrace and recommend this land swap.

FOREST CARNIVORES (Page 3-66)

These areas generally are above 9,000 feet in elevation in the conifer, aspen, and alpine cover types. Most natural processes are allowed to continue; however, vegetation may be intensively managed to enhance habitat characteristics for carnivores. Management activities will provide opportunities for timber harvesting and grazing.

Vegetation may be intensively managed to provide suitable habitat characteristics to assure foraging, denning, and movement capabilities for lynx and wolverine. Lynx habitat characteristics include dense downed logs, which are often found in late-successional forests and used as denning habitats; dense regeneration of conifer forest types, which provide suitable habitat for snowshoe hare used as food by lynx; and forested habitats, which provide secure travelways between denning and foraging habitats. Habitats important for wolverine include high-elevation talus and boulder fields for maternity dens.

Comment: The City and County support the designation of Carnivore Habitat Areas on the forest. We support research on lynx and wolverine habitat. We are however troubled by the single-minded approach that relies on disturbance from timber harvesting to create habitat improvements. Very little scientific data exists regarding the best way to enhance habitat for lynx in Colorado. Our review of the literature suggests that a very cautious and experimental approach is advised. For example, there is sufficient evidence that mature and old growth gap phase, rather than early successional, forests provide the best combination of prey densities and microclimatic conditions for lynx in the southern Rocky Mountains[1] . That stands in opposition to heavy reliance on timber harvesting, including up to 80 acre clear cuts, prescribed in the Forest Plan.

A preferred approach would be to identify habitat areas in the plan with a variety of possible approaches to meeting habitat improvements, including fire. There are clearly areas on the forest which provide the appropriate habitat and which could use fire for disturbance. Other areas would use roadless selective cuts to move into the desired state and smaller clear cuts could be tested in areas with existing roads. During the next Forest Plan revision, measures would be employed to assess the success of each approach. In addition, we anticipate that lynx introduced in the San Juans in 1999 and 2000 will provide us with invaluable information by indicating which habitats they prefer. **We strongly recommend continued research efforts and monitoring to better understand lynx and wolverine habitat before pursuing clear-cutting, for habitat reasons. The current proposal is unacceptable and fails to recognize impacts related to roads and loss of forest mosaic.**

[1] See Buskirk, S.W. et al. 1999. Comparative Ecology of Lynx. USDA Forest Service Gen Tech. Rep. RMRS-GTR-30, Chapter 14.

Historically, Pitkin County and the City of Aspen have established policies and provided funding to preserve open space and wildlife habitat. We respectfully request that the Forest Service work in step with us in this effort and involve our County Wildlife Biologist during consideration of habitat improvement measures.

INHOLDINGS

Comment: The Draft Forest Plan fails to identify and address forest inholdings in Pitkin County. Local governments are very concerned that mining claims and land grants could become private resorts in secluded and difficult to serve locations. Pitkin County has exhausted millions of dollars and countless hours trying to resolve conflicts between community desires and private rights related to inholdings and mining claims. The Forest Plan needs to address this critical issue for our future.
Recent land use proposals by Tom Chapman and the proposed Piano Creek Ranch project near Pagosa Springs have made the consequences of inaction clear. Pitkin County struggles to provide the level of services desired by our existing population. Providing services to residents or visitors at remote locations surrounded by forest lands would create great financial risk for our government. The attached article from the *New York Times* describes the issue.

'Undiscovered crisis' -- developers invade wilderness
Tuesday, November 2, 1999
By MICHAEL JANOFSKY
THE NEW YORK TIMES

PAGOSA SPRINGS, Colo. -- Nestled in the San Juan National Forest in southwestern Colorado is a small rectangle of mountains and a valley that straddles the meandering East Fork of the San Juan River.

For now, the rectangle's 2,780 acres are indistinguishable from the surrounding landscape, a dream scene of 1.8 million pristine acres at the Continental Divide,where the only sounds are the water rushing over rocks, the wind and the occasional cry of birds high overhead.

But that is about to change.

Like more than 50 million other acres inside the United States' national parks and forests, only a fraction of the total, the acreage is privately owned. It was one of thousands of land grants made available, in some cases almost 140 years ago, for homesteading, mining and railroads.

Although most of the private tracts remain undeveloped, owners of the rectangle here are planning to build a members-only resort on 240 acres that they call Piano Creek Ranch, where membership shares cost $385,000 to $535,000.

Designed to accommodate 395 families, the resort would include spacious houses, lodges, a golf course and an equestrian center. A ski area would be built on another part of the rectangle. Already, 175 families have signed up, and ground breaking is scheduled for June, with completion planned in two years.

Preservationists say developments like Piano Creek represent only the beginning of a major problem throughout federal lands. It is "the undiscovered crisis," says the National Park Trust, a non-profit group that buys land and donates it to the park system.

"This is one of the results of the booming economy and a lot of new disposable wealth," said Steve Thompson, senior vice president of the Trust for Public Land, another non-profit organization that works to preserve national park lands and forests.

"With population pressures and beautiful places disappearing, people of means are saying, 'I'll get my little corner of Paradise,' and they do what they want with it," Thompson said. "They have the legal right to do it. But it's sad that resources that are so spectacular, so beautiful would not be made available to a broader audience, only to a limited group."

And with land prices soaring in areas within some of the country's more popular parks and forests, the federal government and non-profit agencies that buy land for preservation may be unable to compete with private investors.

With growing frequency, owners of "inholdings" are developing acreage for commercial gain, setting off intense fights with preservation groups and community organizations concerned that development could damage the ecology.

"It has become a major concern," Interior Secretary Bruce Babbitt said of private development inside federally owned lands. "We need the resources to buy them out before problems start, and there are willing sellers for most of them. But we don't have the money, so the willing seller decides to sell on the open commercial market."

Each year, the major federal land management agencies -- the National Forest Service, the National Park Service, the Bureau of Fish and Wildlife and the Bureau of Land Management -- provide Congress with a list of privately held property they want to buy.

The park service list alone has a backlog of 10,184 private tracts in 145 parks that officials say would cost the government $1.35 billion to buy for preservation. But Congress never appropriates enough money to satisfy all the needs, so which properties are bought depends on the threat of development, the willingness of the owner to sell and the price.

In recent years, Babbitt said, the four agencies have received a combined $300 million to $400 million annually for the acquisition of private land.

In the Denali National Park and Preserve in Alaska, developers are planning to turn an old 20-acre mining site into a remote lodge. For access, which the federal government is required to provide, the developers are asking the park service to improve a 10-mile road through park land that would cross a valley creek 27 times. Park officials fear that the improvement will encourage other land holders to develop sites near the road.

Given the high property values in Pitkin County and the pressures for development, we request that the Forest Service directly address this issue in the Forest Plan. Specifically, we ask the Forest Service to aggressively pursue Land and Water Conservation and other federal funding for purchasing inholdings in Pitkin County. While Pitkin County has enacted local legislation,

known as Rural and Remote zoning, which would minimize opportunities for such development. The Forest Service cannot rely on local policy makers to address this issue indefinitely.

A review of the Forest Map indicates over 50 inholdings exist in Pitkin County - with a majority in wilderness areas. The Standards and Guidelines should reflect a goal of reducing or eliminating all such inholdings during the term of the plan. Furthermore, it is recommended that the timeframe required for Forest approval of land trades be shortened to the extent possible. **Finally, the City of Aspen and Pitkin County would like to develop a partnership with the Forest Service to acquire inholdings jointly where circumstances allow for such a coordinated effort.**

WEED CONTROL

Forest Plan Page 1-10
Objective 3.4c __ Cooperatively work with federal, state, county agencies, and other non government organizations for control of noxious weeds.

DEIS 3-145
Without a concerted and coordinated effort among local, state, federal agencies and private individuals, noxious weed populations can be expected to expand their ranges, threatening ecosystem integrity and function on the Forest.

Comment: Pitkin County has identified noxious weeds as a threat to the natural landscape. Our residents pay a tax to manage weed issues in the county and the County has adopted a comprehensive weed plan to preserve natural vegetation. Adequate Forest Service dollars and staff devoted to weed control on forest lands in Pitkin County is a high priority. The proposed budget for weed control is insufficient to meet the forest plan goals and desired conditions in Alternative D.

The Forest Plan notes that noxious weeds are one of the greatest threats to forest health. Table 3-36 in the DEIS (page 3-146) indicates that Alternative D allows three times the number of acres of land lost to weeds due to timber cutting as other alternatives. This is primarily due to the significant amount of land proposed for Category 5 uses. This calls into doubt the amount of acreage suitable for timber and the amount of land in the Category 5 designations. **The FEIS should reflect greater budget levels for weed control and a mix of category 5 lands that more closely reflects Alternative C or I. If timber cutting is allowed, a full weed mitigation program should be strictly followed, since noxious weeds enter extensively after the native vegetation has been cleared. Pitkin County and the City of Aspen have adopted weed management programs and plans which will be most effective if we work together to prevent infestations. We support and recognize the Forest Service's commendable efforts to use native plants in their revegetation efforts.**

ALTERNATIVE D LAND AND RESOURCE MANAGEMENT PLAN MAP

Comments in this section are based on geographic areas and/or management prescriptions assigned to designated areas.

MAROON TRAILS

Comment: The City and County support Forest Service actions to improve safety and transit accessibility. The Maroon Bells area requires special attention and management given the unique natural features and the intensity of recreation use.

While we agree that the wilderness areas surrounding Maroon Lake require careful monitoring and management, we suggest that the East and West Maroon Creek trails be kept open for public use. A monitoring program could be established which would identify management objectives specific to those areas and circumstances which would trigger future reevaluation of trail usage for possible closure.

This is an area of concentrated use and very high quality hiking. Our concern is that an attempt to prohibit use will lead to more bandit trails and unintended degradation of the environment. **We recommend that the Forest Service consider changing the prescription for these areas from 1.11 Pristine Wilderness to 1.12 Primitive Wilderness.**

OWL CREEK CORRIDOR

Comment: As identified in the Burnt Mountain Final Environmental Impact Statement, this area provides a critical corridor for wildlife movement, is a critical and productive elk calving area, supports numerous Forest Service Region 2 sensitive species, and supports some of the highest biological diversity in the Roaring Fork watershed. The corridor is challenged by development of private lands to the north and developed ski areas to the east and west. **This management area is proposed as 5.43 Elk Habitat in the Draft Plan. We support the wildlife designation in this area.** This prescription would better reflect the management goals and critical nature of this area. It also reflects the role of this area as portal to the wilderness areas to the south. **The spring closure period in this area should be extended from June 20 to June 30 to protect other species, specifically songbirds.**

Pitkin County has taken strides to protect wildlife movement in this area through our land use review process and Pitkin County Wildlife Plan and seeks coordination with the Forest Service to preserve this wildlife corridor for future generations.

AERIAL TRANSPORTATION CORRIDOR

Comment: Last year, almost 800,000 visitors accessed public lands from our local transit system. Most of these trip are moving skiers between Aspen and Snowmass Village and carrying visitors to the Maroon Bells. Moving people between communities and recreation areas in an

environmentally sound manner will continue to be a critical public issue. We expect demand for transit service to continue to expand and the community is considering significant public capital investments to meet those demands.

There has been discussion of linking the Buttermilk Ski Area to Snowmass Village with an aerial transportation corridor. The concept has been discussed for many years and was discussed as a part of the Burnt Mountain Ski Area EIS. Unfortunately, the gondola concept could conflict with the wildlife calving and movement in critical habitat in the Owl Creek corridor. Habitat protection in this corridor is of primary concern to the City and County.

At this time, there is insufficient evidence to accurately assess all of the possible consequences and benefits of a gondola proposal between these recreation centers. We feel that the most appropriate process for considering an aerial transportation proposal in the future would be through a joint review process of Pitkin County, the City of Aspen, the Town of Snowmass Village, and the Forest Service. An aerial transportation project would require amendment of all of our plans. We note that any such study would need to consider the community transportation benefits and impacts of aerial transportation on other forest users, including other recreation users and wildlife. At this time, we support the Forest Service 5.43 designation between Buttermilk and Snowmass.

COAL BASIN

Comment: Pitkin County is very interested in any proposals for developed and motorized uses in Coal Basin. The county has worked toward public investment and remediation in the area. During mining of the area, wildlife was protected and proliferated because general access was very limited. It is recommended that the area be managed to preserve the diverse and healthy habitat which resulted from limited access. The area is now recovering from coal mining activities with active reclamation of roads and revegatation of disturbed areas. It is expected that over the term of this plan, the site will show little sign of human disturbance. Any proposed management prescription for this area should reflect these ongoing efforts.

Based on the difficulties in enforcement for this area, geological makeup of the land, avalanche concerns, lack of adequate developed parking, desires to support wildlife and the natural setting, and the plan's movement toward segregation of uses, we would recommend a 1.31-Backcounty Recreation Non-Motorized designation for this area. Such a designation would restrict recreation uses to non-motorized users but allow for the possibility of permits for limited recreation uses, such as a snowcat skiing operation.

SKIING

Comment: Skiing continues to play an important role in our regional economy. Maintaining and enhancing skiing facilities on public lands is primarily a private sector activity. However, any such improvements affects land use, transportation, and community viability. **We look forward to a new era of working together with the Forest Service to analyze and require**

mitigation for impacts of ski area improvements on both public and private lands. The current bifurcated review process does not allow for comprehensive and cumulative review.

We support the Aspen Skiing Company's request to amend the Forest Plan Burnt Mountain Area permit Boundary to allow an East Burnt Mountain Traverse. We also support the Skico request to include the previously approved trail between Teaser and Jacob's Ladder.

WILDERNESS

Comment: The designated wilderness areas in Pitkin County are cherished for both their cultural and utilitarian values. A majority of the Forest Service land in Pitkin County has been designated Wilderness through cooperation of local government, citizen groups, the Forest Service, and our congressional delegation. We believe that this has benefited both our culture and economy.

The roadless areas that still exist in the White River National Forest represent the most important management opportunity on public lands. These areas hold a key to preserving sustainable ecosystems in our region. While many will disagree on specific scientific and management findings, we can agree that roadless areas in our region are critical to preservation of our natural heritage. Therefore, examination of Roadless areas for Wilderness designation is a critical element of our review of the Draft Forest Plan and Management Area prescriptions.

Visitors are central to the economy of Pitkin County. A recent survey done by the Aspen Chamber Resort Association found that 81% of guests to the area list their number one criteria in choosing a destination resort as "scenery." The value that tourism brings to the community is far more important in economic terms than any extractive industry. The Wilderness areas surrounding Aspen and Snowmass Village provide visitors with incredible vistas and opportunities for experiencing the natural environment while renewing their "mind, body, and spirit". This experience is an aspect of the "Aspen Idea" of human renewal which has guided the development of our resort community. We see the nearby wilderness areas as central to our economy and way of life.

Recent studies have shown the economic benefits of natural landscapes and environmental protection. In the book, Lost Landscapes and Failed Economies: The Search For a Value of Place, Professor Thomas Powers of the University of Montana, documents the volume of data suggesting that land preservation serves the economic needs of local and federal governments better than extractive uses. A Forest Service paper titled, Economic Well-Being and Environmental Protection in the Pacific Northwest, also concludes that, "a healthy environment is a major stimulus for a healthy economy". Finally, the University of Colorado published the article, A New Look at Old Vistas: The Economic Role of Environmental Quality in Western Public Lands by Ron Raskler which documents the economic value of wilderness areas.

During his announcement of the President's initiative to protect 40 million acres of Roadless Forest Service lands, Secretary of Agriculture Dan Glickman stated:

"Public opinion and extensive scientific work have pointed to the ecological and social importance of roadless areas. These areas have unique values that provide Americans with significant benefits such as clean water, wildlife habitat, food for hunters, and recreational opportunities. As part of the national dialogue we are beginning, we need to discuss how to best protect these unique values for our children and our children's children.

We also need to discuss the issue of where the agency should invest its limited resources. For example, entering roadless areas is expensive. Timber sales in unroaded areas require environmental impact statements and tend to be very contentious. In fact, many of the lawsuits the Forest Service has faced and lost in recent years involved plaintiffs trying to prevent the Forest Service from building new logging roads into roadless areas.

The Forest Service also has a tremendous amount of forest health work to do in roaded areas. For example, the regional science report for the 75 million acre Columbia Basin said that more than 80 percent of existing forest health problems occur in roaded areas. Other roaded areas across the country face similar problems. Indeed, forest managers almost always get a bigger bang for their buck by investing in forest health projects in roaded areas rather than roadless areas.

Some have argued that this proposal aims to limit Americans' access to their public lands. Nothing could be further from the truth. In reality, the public is likely to lose more access to the national forests from deterioration of the existing road system than it ever would from a temporary or permanent reduction in new road building in roadless areas. Given budget realities, the Forest Service is having difficulty maintaining its current road system. In fact, since 1990, the American people have lost nearly 10,000 miles of road access due to failed maintenance and deterioration, while the Forest Service has built less than 5300 miles of new road into both roaded and roadless areas."

Given the Secretary's statements above and the volume of information regarding the social and economic value of preservation, the modest amount of land proposed for Wilderness and the new roads proposed in roadless areas seem counter-indicated. Of the 298,000 acres of roadless areas, only 42% of those lands are proposed for MA 1.2 or Group 1. Given that any other designation is likely to result in roads and/or developed uses, this points out a weakness in the Preferred Alternative.

The Wilderness Act provides direction for identifying and proposing Wilderness areas to Congress. The **Wilderness Act** gives the statutory definition of Wilderness (Section 2(c)):

"A Wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain.

An area of Wilderness is further defined to mean in this Act an area of undeveloped federal land retaining its primeval character and influence, without

permanent improvements of human habitation, which is protected and managed so as to preserve its natural conditions and which:

(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;
(2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;
(3) has at least 5,000 acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and
(4) may also contain ecological, geological, or other features of scientific, educational, or historical value."

Based on the above, we strongly urge the Forest plan to incorporate protection of the remaining roadless areas in Pitkin County. We recommend a twofold approach to providing that protection. First, in addition to the Wilderness areas proposed in Alternative D, we recommend that both the Hunter (75) and North Independent "A" (77) areas be proposed for wilderness. Both areas are natural extensions to the existing Hunter-Fryingpan Wilderness area. While neither of these sites is likely to qualify as pristine wilderness due to proximity to population and current usage, they would be excellent areas for 1.13 Semi-Primitive Wilderness. This would provide an useful edge to the more primitive and pristine areas thereby creating more core area for wildlife, recreation, and ecological renewal.

We also request that the Sloan Peak roadless area be protected from roads. The boundaries of this 19,900 acre area are difficult to clearly identify based on the maps provided but it appears that the area has designations of 1.41, 1.31, 5.4, and 5.41. We support the Core Area and Backcountry Recreation designations which will allow hunters, hikers, and other non-motorized uses. The roadless areas proposed for 5.4 and 5.41 are the most troubling. We ask the Forest Service to consider additional 1.31 or 3.32 Backcountry Recreation designations for those areas. The President's Roadless Initiative may address this issue but Pitkin County and the City of Aspen wish to be on record supporting preservation of this area as roadless.

HUNTER CREEK CARNIVORE HABITAT AREA

Comment: The only areas identified for Carnivore Habitat Management in Pitkin County are the Smuggler Mountain/Lower Hunter Creek Area and the Upper Frying Pan area from Lime Creek to Hagerman Pass. **The Smuggler area, ranging from approximately 9,000' to approximately 11,000' in elevation and dominated by Engelmann spruce forest, is inappropriate to this prescription.** This is a very popular recreation area that would conflict with the intensive management described in this prescription. In addition, this prescription is intended to "supply…security from intensive recreation and other human uses". It is within two miles of a population base of roughly 5,000 people and 3,300 tourist beds. The Lower Hunter Creek/Smuggler/Warren Lakes area is too heavily utilized for recreation for this purpose. **This area is more suited to a mix of wilderness and recreation designations.**

The Upper Frying Pan region is appropriate given the type of habitat, remoteness, and history of logging activity. While this area is appropriate for the Carnivore habitat prescription, we still do not support use of clear-cuts as a management option at this time based on the data available. We would look forward to working with the Forest Service to identify the most appropriate disturbance approach for this experimental area.

DRAFT TRAVEL MANAGEMENT PLAN COMMENTS

The following comments on the White River National Forest Plan are specifically focused on the Travel Management portion of the plan. Staff met with representatives from the Aspen District and the Sopris District to review specific road and trail use changes and their related impacts as outlined in preferred alternative "D". The comments have been divided into four separate areas, which includes the Winter Travel Management and Summer Travel Management of the two different districts, Aspen and Sopris.

Generally, the approach alternative "D" takes in regard to managing travel on the Forest is in response to technological advances in the way people travel and experience the land. Since the last White River Plan mountain bikes have been developed, the technology behind motorized dirt bikes is allowing riders to more effectively climb difficult terrain. Motorized four wheelers have also become increasingly popular. These three modes of summer travel are allowing people to access more remote sites with increasing regularity than ever before. This travel type, along with the general increase in forest use, has negatively impacted the forest environment. Additionally, conflicts between these modes of travel, hikers and horseback riders are becoming more frequent and with more potential for serious injury.

In the winter, the forest is experiencing a similar phenomenon. The power to weight ratio of new snowmobiles and technological advances in their propelling systems are allowing people to access areas of the forest, which typically remained untouched during the winter months. Given changing technology, it should not be assumed that terrain will limit snowmobile or ATV access to any area. Technology advances, along with a greater number of people, are impacting the environment, as well as disrupting the wilderness experience many come to appreciate.

Alternative "D" attempts to mitigate human travel impacts on the forest resource, while providing areas set aside for certain types of travel in order to avoid excessive human conflicts. Separating uses will more effectively ensure continued enjoyment of the resource. **The City and County strongly support the policy of considering roads or trails to be considered closed unless posted as open. We also support restricting motorized and mechanized uses to identified roads and trails in order to protect the physical environment and preserve the benefits for future generations. In order for these policies to be implemented, we encourage the Forest Service to increase resources dedicated to education and enforcement.**

In some cases, the perceived changes that Alternative "D" presents, simply reaffirm current misunderstood travel management regulations. Also, Alternative "D" may prohibit winter travel

in areas that are not physically accessible because of topographical characteristics. For instance, under the existing plan no single-track trail in the Aspen District can legally be used by motorized means; a rule many currently misunderstand. Additionally, a significant portion of land Alternative "D" closes to snowmobiles is already limited to snowmobile use by its topography.

Overall, the City and County agree with the approach taken in regard to travel management in alternative "D" given population increases, technological advances and related recreational impacts on the Forest. The City and County also support road closures proposed in Pitkin County. We encourage expedited reclamation of those roads and will monitor progress. We propose developing a joint plan for timing reclamation. The plan gives consideration to the wide variety of uses the forest currently experiences. The City and County were impressed with the level of detail in Pitkin County's area of the White River Forest and the following are comments about specific items.

COMMENTS REGARDING OVERALL TRAVEL MANAGEMENT ASPECT

- Enforcement of the plan's regulations will be a continual challenge to the USFS and will be the deciding factor in the success of any White River Forest Plan. **We encourage the Forest Service to focus the human and financial resources necessary to implement and monitor this plan. The budget included in the draft seems insufficient to provide meaningful enforcement.** Given the significance of the change in management, reallocating resources to this task is advised. Without enforcement, there could be numerous unintended consequences to private landowners and an inability to manage public issues and education regarding travel management.

- **Another weakness in the document is a lack of planning and budget for adequate parking facilities at trailheads- particularly for motorized uses.** If motorized uses are concentrated into the planned areas, then developed parking facilities are needed at those sites. the final plan should address location and funding for necessary facilities. Ad hoc parking leads to unsafe travel conditions on county roads and impacts to neighbors.

- **We also note that seasonal closures for wildlife do not appear to be represented in the Travel Management map. Seasonal restrictions should be in place on the following trails: Government Trail (FDT 1980)- 5/15 to 6/20 and 10/30 to 11/30, Tom Blake (FDT 1976)- 4/25 to 6/20 and 10/30 to 11/30, Anaerobic Nightmare (FDT 1980.1)- 4/25 to 6/20 and 10/30 to 11/30. Seasonal closures will also be required in the Owl Creek corridor between Buttermilk and Burnt Mountain.** It would be helpful to have a specific description and designation for these trails on Forest Service maps to increase education and compliance.

- Finally, as recreation demand grows existing developed recreation areas will need to accommodate additional and increased uses. We can expect additional demands for trails and other uses at these sites. **Accommodating a reasonable increase in uses and users on these lands will require increased coordination of Forest Service and City/County planning**

processes. A joint review process will be imperative to meet the recreation demand while protecting the environment.

WINTER TRAVEL MANAGEMENT - ASPEN DISTRICT

- **While there is no net increase in area which snowmobiles can access in the Aspen District, there will be an increase in miles of trails snowmobiles can use on Richmond Hill. This is consistent with the Richmond Hill Management Plan group and is an appropriate change based on the lack of snowmobiling opportunities around the Aspen Area.** However, parking problems caused by this possible increase in snowmobile use in the Richmond Hill area has not been adequately addressed by the plan, but it is currently being developed by the Richmond Hill group in cooperation with the USFS and the County.

- **Pitkin County supports the Kobie Park area for snowmobile travel and the attempt to separate conflicting uses.**

- Given wilderness trespass problems up Independence Pass, all snowmobiles will be limited to Lincoln Creek and SH 82. Additionally, Montezuma Basin Road will be closed to snowmobile travel because of the wilderness trespass problem (It is difficult to stay on a road when all land is snow covered). **Snowmobile use in wilderness areas is clearly prohibited and should be. We support these appropriate changes given the trespass problem.** Further, County Rights-of-Way in wilderness areas are legal loopholes for snowmobile travel and the County will consider following the USFS's lead in closing certain County Roads after adoption of a final plan, which travel through designated wilderness areas in an attempt to curtail wilderness trespass. Any closures to USFS roads to snowmobiling will add user volume to county roads in the area.

SUMMER TRAVEL MANAGEMENT – ASPEN DISTRICT

- **Generally, mechanized or motorized travel will only be able to access designated routes.** The routes designated are currently the most utilized trails by these forms of travel and are consistent with the Hunter Creek Task Force recommendations. **This approach is appropriate to minimize maintenance costs and environmental damage.**

- **The current designation, which incorporates the East and West Maroon Creek Trails, should be changed from Pristine to Primitive in order to allow continued maintenance on these popular trails.**

- The USFS should limit all Maroon Creek Valley motorized and mechanized access to Maroon Creek Road rather than along river trails. This would limit impacts by these forms of travel to paved areas.

- **The Hunter Creek Task Force has recommended that Bald Knob Road be opened to vehicular travel up to the wilderness boundary. Vehicular access would be managed**

through the current County ordinance limiting motorized access in this area to "hunters actively pursuing big game". The City and County endorse this proposal.

- **Though the trail is drawn across her property, there is no public access to Trail No. 1959.1 through Connie Harvey's property at Johnny Draw (T9S, R86W, Section 33).**

- **There is also no formal public access easement through the Child's ranch (T9S, R86W, Section 31) to Trail No. 1962.1N.**

WINTER TRAVEL - SOPRIS DISTRICT

- **The USFS maps show the lower 1.3 miles of Coal Creek Road as a USFS road. This is clearly a County Road and should be changed on the plan. Additionally, the upper (USFS) portion of the road has been opened to motorized travel. While the appropriateness of this designation is debatable, there has not been a facility developed for parking to support this use at the end of the County Road. A more formal and adequately sized parking facility should be developed as part of this plan if the management is not changed as per our comments.**

- The Hay Park Trail has been designated for motorized access from Prince Creek Road to Capitol Creek Road. The wilderness trespass problems in this area have been extreme, including motorized travel up Mount Sopris. If snowmobiles are allowed to use the Hay Park Trail it is unlikely that they will remain on the trail in the open meadows through which this trail passes. This regulation would be extremely difficult to enforce. **The City and County recommend prohibiting snowmobile access at the Hay Park trailheads based on the extreme nature of the current wilderness trespass violations.**

- A significant change is located in the Upper Frying Pan Valley where motorized access has been eliminated over the area from the Upper Frying Pan through Hagerman Pass. While this closure may be appropriate, it is unlikely the vast majority of snowmobiling activity on top of the pass, which originates in Leadville (where snowmobiling up to the pass is allowed), will comply with closures in the White River National Forest. Changes in Forest Management **Policies will need to implemented on the Leadville side of Hagerman Pass in order to ensure compliance with this closure.**

- The plan designates an area near McClure Pass for X-country skiing (or snowshoeing) given the area's unique pristine characteristics. **This is a great effort to separate asset users and provide a quiet area for non-motorized uses for those seeking tranquility, while maintaining areas like Four-Mile for more active motorized uses.**

- The Eagle-Thomasville Road has been identified as the primary access for snowmobiles. This area, at the end of the County Road, is narrow and expansion for any type of parking is limited by its topography. **The USFS should identify parking alternatives for users of this snowmobile access point in the Forest Plan.**

SUMMER TRAVEL MANAGEMENT – SOPRIS DISTRICT

- The plan does a good job of separating uses around the Thompson Creek and the Four-Mile areas.

- Some trails in the Thompson Creek area end at private lands (private landowners have not yet prohibited public use), rather than continuing on to connect with other public roads or trails. The USFS should pursue acquiring these parcels or securing trail easements in order to ensure continued use of these trails through private lands and allow users to complete popular continuous looped trails in the area.

- The plan does a good job in the Thompson Creek area of utilizing seasonal trail closures for elk calving.

- **Coal Creek Road has been designated for non-motorized use at the end of the County Road (1.3 miles). It would be more appropriate for this designation to begin at Bradrich Creek, a couple miles up from the end of the County Road. This would allow a more significant parking area to be used, rather than the limited parking at the end of the County Road.**

- **The USFS portion of the trail extending from the Arbaney-Kittle Trailhead is identified as open for motorized use. This cooperatively developed trail between the DOW, USFS and Pitkin County was originally identified as a non-motorized hiking, equestrian and biking trail only. The lower portion of the trail begins on County property and enters BLM before finally becoming a USFS trail.** The popularity of this trail for equestrian, hiking and biking uses will not blend well with motorized uses. The safety of both hikers and motorized users will be compromised if this trail is designated for motorized use. **This trail should remain a non-motorized trail for its entire length for safety reasons.**

- **Due to safety concerns relating to conflicts between horseback and bikers, Perham Creek Trail should be designated foot and horseback only.**

Draft Environmental Impact Statement Comments

The following comments are directed toward the DEIS.

SOCIOECONOMIC IMPACTS

Comments: The relationship between impacts from developed recreation on forest lands and development approvals on private lands is ignored in the DEIS. As we have learned

about the importance of habitat continuum from public to private lands, we must study and consider the relationship between land use decisions on public and private land. **A lack of analysis regarding these relationships has existed historically and still needs to be addressed in the FEIS.** Forest Service employees, Bev Driver among others, have begun to examine the relationship to Forest Service uses on private lands. through the "Human Dimension" studies.
One of the great learnings of the late 20th century is the evolution of thinking around ecosystem management. We are learning to examine connections and relationships between actions on the landscape. The same lessons need to be learned with regard to the Human Dimension- particularly with regard to the socioeconomic benefits and impacts of developed recreation.

The DEIS fails to satisfactorily address the revision issue of Urbanization. The treatment of this topic would be difficult to justify in the NEPA process. After a significant issue is identified, the process calls for a review of impact by alternative and proposed mitigations or avoidance. **There is no evidence in the document that such an analysis was performed or how the issue was used in selection of the Preferred Alternative.**

In addition, Forest Service regulations require the Line Officer to review and consider local Comprehensive and Master Plans (Title 36, Chapter II, Subpart A, Part 219, Sec. 219.7 (c)) during Forest Planning. While City and County staff have appreciated the level of support and interaction with Forest Service staff, there is no evidence of consideration or review of our planning documents or goals.

Our analysis of the DEIS in relationship to local Comprehensive and Master Plans concludes that only Alternatives D or I could be refined to successfully integrate land use goals between private and public lands. That conclusion is based on meeting wildlife, transportation, environmental protection, quality of life, and economic development goals. Pitkin County and the City of Aspen have made bold strides in protecting natural resources in our region and we look forward to working with the Forest Service to refine the Preferred Alternative into a seamless plan for protecting resources on private and public land.

Unfortunately, the current WRNF position on economic growth can be summed up in the following quote from the DEIS.:

"Socioeconomic changes in the seven-county planning area are caused by actions initiated by businesses, governments, and other organizations."

This statement is contrary to what we have learned about ecosystem management. The theory is that employment and income tied to private sector development and market expansions will increase rapidly, while employment and income related specifically to FS regulated activities will increase, but more slowly than private sector development. Skiing is the most significant economic engine regulated by the Forest Service. According to the DEIS, skiing accounts for about 94% of the jobs generated by Forest Service regulated activities (31,996 jobs region-wide in 1997). The WRNFS DEIS states that skiing-related economic growth is waning in

importance, and other activities occurring on private land like construction of second homes, conferences, and summer festivals are increasing in importance. The document ignores the obvious relationship between permitted uses on the forest and development off the forest.

The DEIS relies on the IMPLAN model to assess socioeconomic impacts. The "input/output" model provides useful but very limited analysis of the symbiotic relationship between forest uses and economic activity.

For example, below is a summary of the WRNF methodology for calculating skiing related jobs:

> Estimated user days and skier day increases for the various alternatives based primarily on past trends.
> Used available data for estimating per user or per skier expenditures.
> Used IMPLAN model to estimate the employment and income implications of the estimated number of users.
> The IMPLAN model was benchmarked with employment, income, and population numbers generated by the demographer's office and confirmed by local governments.

Such an analysis ignores the multiplier effect of economic activity and completely ignores secondary impacts. Below is a critique of methodology:

- Skier expenditure data is based on state averages and does not reflect the continual efforts of the skiing industry in our County to extract more dollars from each customer. **The $184 per day per skier for destination skiers figure used by WRNFS does not reflect the expenditures required to ski and lodge in the Aspen Area. With the average "economy" lodging unit renting for about $240 per night and a day pass for an Aspen Skiing Company mountain at over $60, $184 per day per person would not go far in this valley.**

- **The analysis only considers impacts directly linked to visiting skiers. It does not include "local" skier expenditures.** The lines between locals and visitors becomes increasingly blurred in resort areas where part-time residents are spending more and more time in residence. In fact, Post Construction Residential Workforce Dynamics (Preston, 1999) indicated that the more "local" a part-time resident is, or the greater the occupancy of a part-time residence, the greater their economic contribution. **"Locals" in resort areas increasingly spend money locally that originates from outside of the community (dividends, investments etc.), and therefore have the same effect as a tourist on the local economy.**

- **A model driven by skier days does not take into account the relationship of ski areas to demand for real estate at or near the base areas.** On mountain improvements most often happen hand-in-hand with base area real estate development as part of the continual upgrade of the skiing environment. Local examples include the concurrent on mountain improvements at Aspen Highlands, the Highlands Village development, the townhomes and condos at the Tiehack base area of Buttermilk, and the upgrading of the Tiehack lift. Real estate developers capitalize on the on-mountain improvements and that ultimately such

developments increase real estate values in or near the base area and make the area more attractive for development purposes.

- Admittedly, local governments are ultimately responsible for up-zonings and subdivisions that finally enable such developments, but ski area improvements, by increasing the attractiveness of real estate near the ski area, contribute to the demand for real estate development. **On mountain improvements are regulated both by the forest service and by the County, and so the burden should not be placed on either entity. Rather, the County and the FS should begin analyzing on-mountain improvements at a larger scale. We would welcome discussion of a joint review process which addresses issues comprehensively while working within the regulations which guide each jurisdiction.**

It would benefit the public throughout the region, if the Forest Service would revise it's socioeconomic modeling to address off-site impacts related to on-site activities. Obviously, the relationship between private activities and Forest Service management are inter-related and accountability works both directions. **We need to move beyond finger-pointing and into collaborating on solutions and better analysis. Pitkin County staff would be available to participate in a task force to improve Forest Service modeling for forest planning and review of permits.**

Given the modest proposals for increased development in Alternative D, this problem is minimized. Should additional developed recreation or another Alternative with more developed recreation be considered, our concerns would be much greater.

ACTIVE MANAGEMENT VS. CONSERVATION BIOLOGY

Comments: Few people believe that either approach, active management or conservation biology, hold all of the answers to managing our forests. Each situation calls for decisions based on the best available information at the time. **Given the current direction toward ecosystem management, the roadless initiative, and growing interest in conservation biology, it seems prudent that a plan for the next 15 years would err on the side of conservation biology. While the goals of immediate intervention to support biological resources are important, the consequences of a timber cutting and clear cutting approach will limit future choices for resource managers.**

The Forest Service would be wise to engage the greater community in a dialogue about the role of natural disturbance, specifically fire, in the region. We need to share information regarding the benefits and challenges to using natural disturbance for long term ecological health. This issue is not acute in Pitkin County, but we encourage the Forest Service to consider these comments when considering any possible alterations to the Preferred Alternative or the FEIS. Moreover, **adequate funding must follow adoption of this plan; the management and prescriptions will be completely ineffective if there is not funding and personnel for enforcement.**

AIR QUALITY AND NOISE POLLUTION

Comments: The City of Aspen and Pitkin County have undertaken a number of costly and difficult measures to keep air quality as clean as possible. These include emissions testing in Pitkin County, diesel vehicle standards for contractors, the state's second-largest mass transit system, our extensive network of bike/pedestrian pathways – all in an attempt to keep our air as clean as possible. This effort is hampered by activities that generate large amounts of air pollution.

According to the Forest Service analysis of alternatives, Alternatives D and I most successfully protect overall air quality in the National Forest. This is an important issue for the residents of the City of Aspen and important for the town's economy as well.

We ask Forest Service staff to confirm that the air quality analysis presented adequately assesses the impacts of snowmobiles on air quality. Air pollution emissions from snowmobiles are very high. Levels of particulate, carbon monoxide and hydrocarbon emissions in areas where use is common, are a health concern to people who may be visiting and/or exercising in the area. Primary pollutants of concern from snowmobiles are particulate matter, nitrous oxide, carbon monoxide, and hydrocarbons. A modern snowmobile emits about 225 times the carbon monoxide and 1,000 times the hydrocarbons and nitrous oxides of a modern car.

Two-stroke engines power nearly all snowmobiles. According to the U.S. Environmental Protection Agency (EPA), two-stroke engines dump up to 30 % of their fuel, a mixture of gas and oil, directly into the environment. By contrast, automobiles are driven by four-stroke engines which release 97% fewer emissions than two-strokes. Furthermore, new EPA and CARB regulations have reduced pollution on new automobiles even more, creating an even larger gap between two-stroke snowmobiles and the much cleaner automobiles.

The California Air Resources Board (CARB), using data from the International Snowmobile Manufacturers Association, concluded that one hour on a typical snowmobile produces more pollution than driving a modern car for a year.

Noise is another concern as snowmobile use has grown. The decibel reading (db) at 10 feet from an idling snowmobile (stock machine) is approximately 65 db, and at open throttle approximately 90 db. A prolonged (eight hours) noise level at 90 db can cause a loss of hearing and physiological stress.

Pitkin County's and the City of Aspen's noise ordinances restrict noise levels in residential areas to 50 db at night and 55 db in the daytime. There may be some expectation that noise levels in National Forests would be less than levels in residential areas. In any case, **the noise levels in areas where snowmobiles are in use exceed the standards for residential areas in Pitkin County and the City of Aspen, and when a number of snowmobiles are present, would be likely to exceed the levels in the codes even for highway noise.** The noise generated by snowmobiles may not meet the expectations of some users of local ski areas or other backcountry users.

W3692

Although we recognize that improvements to snowmobile engines are likely during the scope of the Plan, we strongly support the restrictions the Preferred Alternative places on motorized users and the segregation of snowmobile uses. We believe that such a policy will minimize impacts on public health and other forest users. Any attempt to dilute the motorized policies in the Preferred Alternative in Pitkin County cannot be justified with today's technology and would fail to address the benefits of segregating motorized uses.

FIRE PLAN

Comment: We were unable to find a commitment for funding or completing fire plans in wilderness and other areas where natural disturbance would be utilized. The Forest Service needs to immediately fund and initiate such plans in Pitkin County. We look forward to working with staff on those plans.

W4135

John Martin
Glenwood Springs, CO

Larry McCown
Rifle, CO

Walt Stowe
Glenwood Springs, CO

Garfield County
Board of County Commissioners

April 3, 2000

National Forest Service
White River National Forest Headquarters
900 Grand Avenue
Glenwood Springs CO 81601

To Whom It May Concern:

After careful evaluation of all available material concerning the White River National Forest, the Garfield County Commissioners have decided to offer our support for the McInnis/Woodrow Compromise.

As the elected officials for Garfield County it is our responsibility to review all available information before making any decision that is critical to the future of Garfield County. We find that flexibility is the key to forest diversity and health. The McInnis Compromise blends the strongest components of Alternatives B, C, D and I under the banner of one fair-minded and common sense oriented management approach. In addition to blending the strongest components of B, C, D, and I, the McInnis Compromise eliminates the proposed in stream flow regulation which runs afoul of state water laws. Letting the Colorado Water Conservation Board do their job is the best way to provide for in stream flows - not getting the government involved.

Thank you for the opportunity to provide comment on the White River National forest Plan. If you have any questions about our position, please feel free to contact Greg Butler, Senior Planner, and he will advise the board of your concerns.

Sincerely,

John Martin
Chair

109 8th Street, Suite 300 • Glenwood Springs, Colorado 81601-3363 • Telephone (970) 945-5004

W4137

QQ

WATER QUALITY / QUANTITY COMMITTEE

Post Office Box 2308 • Silverthorne, Colorado 80498
(970) 468-0295 • Fax: (970) 468-1208 • email: qqwater@colorado.net

April 6, 2000

Ms. Martha Ketelle
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

RE: White River National Forest Plan Revision and Draft Environmental Impact Statement

Dear Ms. Ketelle:

Enclosed is Northwest Colorado Council of Government's Water Quality & Quantity Committee's ("QQ") comments on the White River National Forest Plan. Please let us know if you have any questions.

Best Regards,

James L. Newberry

James L. Newberry
QQ Chairman and Grand County Commissioner

Enc.

W4137

MEMORANDUM

To: White River National Forest

From: Northwest Colorado Council of Governments' Water Quality & Quantity Committee ("QQ")

RE: Revision of the USFS White River Forest Plan

Date: April 6, 2000

Northwest Colorado Council of Government's Water Quality and Quantity Committee ("QQ") appreciates the opportunity to offer comments on the White River National Forest Plan ("WRNFP") and Draft Environmental Impact Statement ("DEIS").

QQ is a voluntary association of counties, municipalities and water and sanitation districts in Summit, Eagle, Grand, Pitkin, Gunnison and Park Counties. QQ's mission is "to enable its members to protect and enhance the quality of Colorado's waters while facilitating the responsible use of those resources for the good of all Colorado citizens and its environment." Though QQ is submitting comments on behalf of all its members; individual members reserve the right to submit individual responses to the WRNFP.

We have reviewed the White River National Forest Draft Environmental Impact Statement ("DEIS") and Proposed Land and Resource Management Plan (the "Plan") for elements that are relevant to water resource protection. Our evaluation of the document is based on QQ's current policies. We have not focused on a specific alternative. Instead, this memo outlines general issues which are organized under QQ's policy headings, followed by general recommendations.

A. LOCAL GOVERNMENT AUTHORITY TO PROTECT WATER RESOURCES

1. Water Supply

The DEIS recognizes that many local governments derive their municipal water supplies from sources on the Forest. Table 3-3 lists these sources. The DEIS states "there are no designated public supply watersheds." See DEIS at 3-39. This statement should be corrected to acknowledge that municipalities have the authority under C.R.S. § 31-15-707(1)(b) to regulate environmental impacts of activities within a five-mile radius of their water supply intake. Several QQ members have adopted regulations under this authority, which apply to areas within the Forest. As you know, the United Supreme Court has held that state and local environmental regulations may apply to private activities conducted on public lands, including USFS lands. See California Coastal Commission v. Granite Rock Co., 480 U.S. 572 (1987).

1

2. Off-Site Impacts

The DEIS fails to disclose off-site impacts from activities on USFS lands. Examples of this type of impact include the following: the loss of dilution associated with upstream snowmaking and transmountain diversions on USFS lands as they effect various wastewater treatment plant discharges; downstream water quality impacts associated with timber harvesting; downstream effect on water quality impaired stream segments (303(d) listed segments) from forest activities; and impacts to aquatic habitat due to activities upstream on Forest lands.

This type of off-site impact should be considered during site-specific decision-making. Category 7 includes a category of management prescriptions to address the interface of USFS and other public and private lands. These prescriptions propose to manage lands to protect natural resources, provide compatible multiple uses, and maintain cooperative relationships between other governments with jurisdiction. See DEIS at 3-70. However, Category 7 is not effectively incorporated into any of the alternatives (prescription 7.1 makes up less than 0.5% of area in any alternative). This category of management, which fosters and encourages intergovernmental cooperation, could be very useful in considering off-site impacts subject to USFS authority during site-specific decision-making, and should be included in any final Plan.

B. WATER QUALITY

1. Total Maximum Daily Loads ("TMDL")

Waters that have been designated as use impaired, 303(d) listed, and require TMDLs by the State of Colorado are described in Table J-2. The DEIS states that "forest management activities must factor in state-listed stream segments during planning and implementation of projects to avoid further water quality degradation." We agree. The USFS should also commit to cooperating with other entities, including local governments, in undertaking efforts to develop and implement TMDLs where forestlands are involved.

2. Water Quality Impacts of Prescriptions

Some prescriptions will have water quality impacts. For instance, prescription 5.13, Forest Products Production, will likely have an impact on water quality. This prescription will require more roads throughout the forest and heavy timber cutting, which in turn typically causes more runoff, more nutrient loading and more sediment in the streams. Logging for water, as suggested by the Colorado Department of Natural Resources, is also not a feasible or recommended alternative. The flow increases would come during spring run-off periods. This could increase flooding, which has stream channel and water quality impacts. Similarly, prescription 8.15 reflects ski-based resorts, existing and future. The DEIS states "generally, the greater the area devoted to ski-based resort development, the greater the risk to watershed resources." See DEIS at 3-62.

According to the DEIS, adverse water quality impacts from activities associated with various prescriptions are prevented through compliance with Plan standards and

W4137

2. Off-Site Impacts

The DEIS fails to disclose off-site impacts from activities on USFS lands. Examples of this type of impact include the following: the loss of dilution associated with upstream snowmaking and transmountain diversions on USFS lands as they effect various wastewater treatment plant discharges; downstream water quality impacts associated with timber harvesting; downstream effect on water quality impaired stream segments (303(d) listed segments) from forest activities; and impacts to aquatic habitat due to activities upstream on Forest lands.

This type of off-site impact should be considered during site-specific decision-making. Category 7 includes a category of management prescriptions to address the interface of USFS and other public and private lands. These prescriptions propose to manage lands to protect natural resources, provide compatible multiple uses, and maintain cooperative relationships between other governments with jurisdiction. See DEIS at 3-70. However, Category 7 is not effectively incorporated into any of the alternatives (prescription 7.1 makes up less than 0.5% of area in any alternative). This category of management, which fosters and encourages intergovernmental cooperation, could be very useful in considering off-site impacts subject to USFS authority during site-specific decision-making, and should be included in any final Plan.

B. WATER QUALITY

1. Total Maximum Daily Loads ("TMDL")

Waters that have been designated as use impaired, 303(d) listed, and require TMDLs by the State of Colorado are described in Table J-2. The DEIS states that "forest management activities must factor in state-listed stream segments during planning and implementation of projects to avoid further water quality degradation." We agree. The USFS should also commit to cooperating with other entities, including local governments, in undertaking efforts to develop and implement TMDLs where forestlands are involved.

2. Water Quality Impacts of Prescriptions

Some prescriptions will have water quality impacts. For instance, prescription 5.13, Forest Products Production, will likely have an impact on water quality. This prescription will require more roads throughout the forest and heavy timber cutting, which in turn typically causes more runoff, more nutrient loading and more sediment in the streams. Logging for water, as suggested by the Colorado Department of Natural Resources, is also not a feasible or recommended alternative. The flow increases would come during spring run-off periods. This could increase flooding, which has stream channel and water quality impacts. Similarly, prescription 8.15 reflects ski-based resorts, existing and future. The DEIS states "generally, the greater the area devoted to ski-based resort development, the greater the risk to watershed resources." See DEIS at 3-62.

According to the DEIS, adverse water quality impacts from activities associated with various prescriptions are prevented through compliance with Plan standards and

2

Goal 1.10 of the Plan states that it will "[p]rovide for instream flows that support the achievement and maintenance in perpetuity of those federal purposes for NFS lands (i.e., safe drinking and swimming, aquatic life and habitat, recreation and aesthetics, and the natural conveyance of water and sediment) that depend on such flows." See Plan at 1-5. The Watershed Conservation Practices Handbook (the "Handbook") outlines design criteria for bypass flow requirements at both new and existing dams and diversions.

QQ policies support instream flow protection in our region, although there are no QQ policies that directly address USFS bypass flows. In any event, QQ would not likely support any USFS instream policy that undermines implementation of the CWCB's Instream Flow Program.

The current policy, as outlined in the Handbook, is to protect current instream uses (40 C.F.R. 131.10 and 230.10) by negotiating flows with States and users to comply with current Federal and State laws and recognize valid existing rights. See Water Conservation Practices Handbook, 12.5 Standard (7). Yet, neither the DEIS nor the Plan describe the status of those negotiations in the White River National Forest. To better understand the effect the proposed Plan will have on existing water rights, the DEIS needs to discuss and assess the status of these negotiations.

D. EDUCATION AND COALITION BUILDING

The Plan describes an intermix prescription, 7.1; yet, it extremely limits use of that prescription in any of the alternatives. This is a critical prescription as it allows for cooperation between landowners, both public and private, and the USFS on lands that border non-USFS lands. The intermix prescription is consistent with some of the goals outlined by the Plan. Under the section Forest-wide Goals and Objectives, the Plan recites goals taken from the *1992 Rocky Mountain Regional Guide*. Relevant goals in that list include: "[p]rotect . . . water and land resources; cooperat[e] with other landowners [to improve] land ownership and access patterns to the mutual benefit of both public and private landowners; and emphas[ize] cooperation with individuals, organizations, and other agencies while coordinating planning and project implementation." See Plan at 1-1. Goal 3.2 of the Plan states that the USFS will "cooperate with individuals and organizations, and local, state . . . and federal governments to promote ecosystem health and sustainability across landscapes." See Plan at 1-10. Yet, the Plan does not describe how these goals will be accomplished since there is no mechanism to facilitate these objectives.

Often the Plan and the DEIS mention that there needs to be cooperation with other agencies, yet neither the Plan nor the DEIS dictate that there will be intergovernmental cooperation. Only the intermix prescription, 7.1, discusses the interface between private, public and USFS lands. The Plan does not recognize local government's land use authority. In most of the headwater counties, the counties consist of 80 to 85% USFS lands. Therefore, the USFS cannot act within a vacuum. It needs to develop and foster a relationship with local governments to ensure that each understands and recognizes the other's authority and objectives.

W4137

CONCLUSION

QQ's recommendations are summarized below.

1. The final Plan needs to recognize local municipal water supply protection ordinances where they apply to USFS lands.

2. There is a need for greater use of the intermix prescription. In particular, this prescription should be used to establish a system to coordinate between USFS activities and county and municipal master plans

3. Assurances are needed that off-site water quality and infrastructure impacts associated with activities on USFS lands will be addressed. Greater understanding of and compliance with the NWCCOG 208 Plan is a likely vehicle for providing this coordination with local water quality protection efforts.

C:\2000 General\WRNF Comments_ (1).doc

W4393

Summit County
COLORADO

PLANNING DEPARTMENT

970-668-4200
fax 970-668-4225

Post Office Box 5660
0037 SCR 1005
Frisco, Colorado 80443

April 4, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Please accept these comments of the Upper Blue Planning Commission on the proposed Revised White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). Our comments are particularly focused on issues related to the Upper Blue Basin in the Dillon Ranger District. Our area of interest generally extends from the Farmers Korner area south to Breckenridge and further south to Hoosier Pass.

As you know, Summit County has held numerous meetings to discuss and receive public comment on the Forest Plan and DEIS. The Upper Blue Planning Commission specifically held three public meetings in September and November of 1999 to receive public comment on a number of issues of particular concern to our basin. The Upper Blue Planning Commission is officially appointed by the Summit County Board of County Commissioners. We are responsible for the development of basin and subbasin master plans within our geographic boundaries. We are also responsible for reviewing all major private, public, and quasi-public development proposals on unincorporated areas in the basin, as well as 1041 permits. The U.S. Forest Service presents all major special use permits to our commission as a way of facilitating both public and commissioner comment.

Our comments that follow thus represent the views of the public within unincorporated areas of the Upper Blue Basin, based on public comments received at our meetings. The Towns of Breckenridge and Blue River may submit their own separate comments on the Forest Plan.

Before making any specific comments, the commission wants to express our thanks for the work of the U.S. Forest Service to date on the proposed plan. We support many of the concepts of Alternative D (e.g., environmental protection, wildlife emphasis, biodiversity). Alternative D is a good place to start from, but needs modifications. The following comments elaborate on this. Please closely consider our suggestions as you draft the final plan.

Travel Management

The commission and the public feel strongly that all areas currently designated for non-motorized use should maintain their non-motorized character. There are too few areas in the County that have a non-

G:majproj\white river nf plan\ubpc forest plan letter

W4393

motorized designation outside of designated wilderness areas. Please consider retaining the Backcountry Recreation Non-Motorized management prescription where it previously applied under the 1984 Forest Plan.

Regarding the proposed travel management plan, we find that the plan is incomplete in its inventory of trails and needs further work. The travel management plan should be separated out from the Forest Plan, allowing adequate time for more in-depth trail identification and analysis. An increased effort is needed to identify trails and include them in the Forest Service system, where appropriate. We understand that staffing is an issue for the forest service and that it is difficult to add to the list of trails that must be maintained. In light of that, we suggest that the Forest Service allow for other appropriate groups to assist in trail maintenance. There also may be opportunities for the County to assist the Forest Service in the trails inventory work. We also have the following recommendations regarding trail issues:

- Important trail connections should be identified and maintained.
- A combination of trail closures, trail reroutes, seasonal closures, and new trail construction should be used to accomplish ecosystem goals or protect environmentally sensitive areas.
- "Non-system" trails should be obliterated only where unacceptable environmental damage is occurring.
- Given the extensive use of existing trails, obliteration of trails may increase environmental damage as users create new trails. Thus, obliteration should be carefully considered.

Some Forest Service trails within the Upper Blue Basin (i.e. Pennsylvania and McCullough Gulches) are accessed across private land. The Travel Management Plan for Alternative D shows these trails omitted from analysis due to private access issues. Such omissions assume these trails are exempt from consideration and thus closed to public access. The Upper Blue Planning Commission recommends all these trails should remain open for public use, despite public access issues. Instead, the Forest Service should be responsible for working with local governments and private landowners to secure access for Forest Service trails identified as significant in County Master Plans. Substantial local efforts have been made to secure access and address conflicts in these areas.

Roadless Areas

Inventoried roadless areas should receive a management prescription that maintains their existing roadless character. These areas are important to maintain for a number of reasons, including scenic integrity and wildlife habitat.

Ski Area Prescriptions

The planning commission generally supports the proposed extension of the 8.25 Ski-Based Resorts management prescription in the areas proposed by Breckenridge Ski Resort (i.e, Peaks 5 and 6, Peak 9, Carter Bowl). The planning commission does not endorse actual expansion of skiing into these areas but feels that it is appropriate to retain the possibility to consider ski area expansions in these areas at a later date. We feel that any proposed ski area expansion should be coordinated with the Town and County to ensure that the expansion and associated on-site and off-site impacts are consistent with the goals and policies of the Joint Upper Blue Master Plan. Off-site impacts of ski area expansion (i.e., traffic) must be addressed. A variety of potential on-site and off-site impacts can be created by ski area expansion. We request that the Forest Service fully utilize the federal requirements for forest planning and environmental review to ensure that all impacts associated with ski area development are fully identified and addressed in any expansion efforts.

2

Aerial Transportation Corridors

The public and the planning commission are very much concerned about maintaining the scenic integrity and existing recreational opportunities in the Upper Blue Basin. As such, we do not support the aerial transportation corridor from Copper Mountain over the Tenmile Range to Breckenridge, which appears in several of the alternatives. We also do not support the proposed aerial corridors from Frisco to north of Breckenridge or the proposed aerial corridor from Tiger Road to Keystone. Possible transportation benefits of such connections seem inconsequential compared to the potential scenic, environmental, and recreational impacts of these aerial corridors. The Tiger Road connection could also have huge impacts on traffic in a currently rural area.

Vegetation Management

There is little disagreement that some of the lodgepole pine forests of Summit County need some type of active management to reduce risk of fire, disease, and to provide more diverse habitat conditions. However, the extent of logging proposed and the "aggressive management" strategy described under Alternative D are alarming and we are not convinced that such a strategy is justified. Based on the most recent revised data provided by the U.S. Forest Service, under Alternative D almost half of the total projected timber harvest on the entire White River National Forest would occur in Summit County in the next ten years. We support a less aggressive approach to timber harvest, emphasizing selective cutting that can clearly be demonstrated to benefit wildlife habitat. Please reconsider the "aggressive management" approach proposed for timber management and instead take a more moderate approach towards vegetation treatments. None of the other five alternatives in the DEIS would involve nearly the amount of harvest in Summit County as proposed under Alternative D, yet it is our understanding that all of the alternatives have been designed to ensure maintenance of a healthy forest.

Intergovernmental Coordination

The proposed Forest Plan lacks discussion regarding coordination of forest activities with local governments and there is no requirement for consideration of local master plans in national forest decisions. We feel that these two issues must be addressed if the Forest Plan and implementing activities are to gain acceptance from the public. Federal law requires that when developing national forest plans, local governments shall be consulted and consideration must be given to locally adopted plans. Federal law specifically requires that the environmental impact statement for a forest plan include:

1) Consideration of the objectives of other Federal, State, and local governments, and Indians tribes, as expressed in their plans and policies.
2) An assessment of the interrelated impacts of these plans and policies
3) A determination of how each Forest Service plan should deal with the impacts identified: and
4) Where conflicts with Forest Service planning are identified, consideration of alternatives for their resolution. (Code of Federal Regulations, Title 16, Part 219.7)

The Draft Environmental Impact Statement for the Forest Plan does not include the above-required analysis. It is our concern that although we have enjoyed a good working relationship with the local ranger district, decisions made in the Forest Plan will preclude past efforts or hinder future coordination efforts. Therefore, we request that the following policy be added to the objectives listed under Goal 3.4 Public and Organizational Relations, of the Goals and Objectives section of the Forest Plan:

"Objective 3.4d. Cooperatively work with local governments to address issues of common concern and to the maximum extent possible maintain consistency with locally adopted master plans."

W4393

Furthermore, we suggest that the Standards and Guidelines section of the Forest Plan include the following to implement the above goal:

Standard: To the maximum extent possible, ensure that national forest management decisions are consistent with locally adopted master plans.

Guideline: Forest service special use permits shall be referred to local government and local planning commissions for comment. Use permits shall not be issued unless the proposed activity maintains consistency with local master plans.

Our commission has also noted that the management prescriptions around urbanized areas such as Breckenridge do not always accurately reflect the interface of uses that occurs in these areas. For that reason, we have looked at the 7.1 Intermix management prescription as a possible tool to use in some of these urban interface areas. Although some of the particulars of 7.1 are too open-ended in terms of the types of uses permitted, we nevertheless support the theme of the Intermix prescription and request that the Forest Service investigate the possibility of utilizing the theme in some of these urbanized locations.

Finally, we would like to commend the Forest Service on your efforts in developing a new forest plan for the White River National Forest. We know this has been a monumental undertaking. The 1984 plan is outdated and definitely needs to be revised. We support your efforts to accomplish this. Please then take the comments we have provided in the constructive manner in which they are intended. We think that working together with the local communities, we can craft a plan that addresses local needs while preserving the forest for future generations of humans and wildlife.

Sincerely,

Mike Turek, Chairman, Upper Blue Planning Commission

Cc: Board of County Commissioners
Lyle Laverty, Regional Forester
Jamie Connell, District Ranger
Senator Wayne Allard
Senator Ben Nighthorse Campbell
Representative Scott McInnis
State Senator Bryan Sullivant
State Representative Glenn Scott
Upper Blue Planning Commission
Steve Hill, Community Development Director
Jim Curnutte, Planning Director
Heide Andersen, Town of Breckenridge
Robin Theobald, Town of Blue River
Gary Severson, Northwest Council of Governments

W4409

Denver Board of Water Commissioners

William J. Shoemaker, President
William R. Roberts, 1st Vice President
Denise S. Maes
Richard A. Kirk
Daniel E. Muse

Hamlet J. Barry, III, Manager

1600 West 12th Avenue
Denver, Colorado 80254
303-628-6000
Fax 303-628-6509
hjb@water.denver.co.gov
www.denverwater.org

April 6, 2000

Ms. Martha Ketelle, Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Re: White River Forest Proposed Revised Management Plan and Draft Environmental Impact Statement

Denver Water encourages environmentally sound water practices in our region. As a water facility owner who holds rights-of-ways and operates under federal licenses and permits on National Forest lands, we support both beneficial water use and watershed protection. To this end, we offer the following comments regarding the Proposed Revised White River National Forest Management Plan and Draft Environmental Impact Statement (DEIS).

Bypass Water Flow or Instream Flow Rights

Page 1-5 of the Revised Plan contains Forest Wide Goal 1.10 and Objective 1.10:

Goal 1.10 – Water Quantity
Provide instream flows that support the achievement and maintenance in perpetuity of those federal purposes for NSF lands (i.e., safe drinking and swimming, aquatic life and habitat, recreation and aesthetics, and the natural conveyance of water and sediment) that depend on such flows.

Objective 1.10 - By the end of the plan period, acquire instream flow water rights or establish instream flow protection measures in special-use authorizations which protect 10% of all perennial streams.

The often requested "by-pass flows" mandated as a condition to renewal of Forest Service permits are of almost no use. They are arguably unlawful, and they provide only that certain flows will be bypassed at a certain point. They do not (and could not) require that the bypassed flows remain in the stream.

Colorado has a state-administered program through the Colorado Water Conservation Board to protect the natural environment by securing instream flows. The U.S. Forest Service should work

CONSERVE

W4409

with the Colorado Water Conservation Board and within the framework of Colorado water law in order to assure flows on the White River National Forest. It is an avenue readily open to the Forest Service, and is in accord with long-held federal and state policy. Further, an instream flow decree would provide a priority date and a proven method to resolve disputes through existing water court procedures. Goal 1.10 and Objective 1.10 should be rewritten to recognize the use of these established procedures. Any attempt to use special-use authorizations to secure instream flows circumvents currently established legal process and would inevitably lead to expensive and needless litigation. The state has several million dollars set aside to litigate the by-pass flow issue. The White River National Forest Plan is not an appropriate or effective method to protect instream flows.

Wild and Scenic River Act – Colorado River Recreational Status Eligibility

Appendix F of the DEIS discusses eligibility of two segments of the Colorado River in Glenwood Canyon for Recreational Status under the Wild and Scenic River Act:

- *Segment 1 – **Recreational***
  From the national forest boundary on the east end of Glenwood Canyon to the upstream end of the Shoshone Dam, four miles, encompassing approximately 6,900 acres of NFS land and 300 acres of private land.

- *Segment 2 – **Recreational***
  From the Shoshone power plant to the national forest boundary on the west end of the canyon, five miles, encompassing approximately 6,900 acres of NFS land and 100 acres of private land.

The DEIS does not adequately evaluate potential impacts to existing water rights that could result from this designation. It is not clear whether upstream water depletions would be considered to impact recreational values. What authority decides if it is an impact or if it can continue? How would this designation affect the operation of the Shoshone water right between segments 1 and 2? There has been some discussion of changing all or part of that water right to accommodate endangered fish needs. Would this Recreational status designation impact the ability to change this right?

Preferred Alternative D

Timber Harvest and Water Quality: According to Table B-4 on Page B-11 of the Proposed Revised Plan, acreage suitable for timber harvest in the Blue River Watershed increases from 6,629 acres in Alternative B to 39,505 acres in Alternative D. This is consistent with forest management goals to a) increase water yield to streams, and b) protect watersheds from fire. However, there are some concerns that it could also increase water quality problems in streams and reservoirs. A study for the Summit Water Quality Committee ("Effects of Timber Harvesting on the Phosphorous Yield from Watershed Segments in Summit County, Colorado," William M. Lewis, Jr., and James F. Saunders, III, April 4, 1995) showed that clear cutting can, in some cases, increase phosphorous loading to streams by several orders of magnitude over no harvest or overstory removal conditions.

The Proposed Revised Plan does not specify the type of timber harvest method that will be used in the Blue River watershed. The DEIS does not adequately address possible adverse impacts to

W4409

Ms. Martha Ketelle
Page 3
April 6, 2000

water quality from the drastic increase in suitable timber harvest acreage under Alternative D if clear cutting is the method used to harvest that timber. As a water supplier with facilities in the Blue River watershed, Denver Water would be harmed by any significant increase in phosphorous in streams in that area. For example, Dillon Reservoir has a 7 ug/l phosphorous limit set by the Colorado Water Quality Control Commission. This issue needs to be more thoroughly researched and adequately addressed in the Proposed Revised Plan and DEIS.

Denver Water supports the Forest Service's efforts to manage the Forest in a way that provides adequate thinning of timber and maximizes water yield from the watershed. At the same time, however, water quality issues related to timber harvest methods must be adequately addressed.

Management Areas: Under the preferred Alternative D there is an increase in Management Areas that emphasize wildlife habitat. An example is management area 5.45, Forest Carnivores, that can involve habitat for endangered species such as the lynx. Denver Water's proposed Eagle-Piney project would take water from a reservoir outside the Forest's west boundary and move it by pipeline or tunnel through the Forest to a point outside the south boundary. The increase in wildlife habitat management areas in preferred Alternative D may impact Denver Water's ability to obtain permits needed to construct and maintain facilities. This could impact Denver Water's ability to access and use its water rights in order to provide adequate water supplies to its service area. This potential impact is not adequately addressed in the DEIS. Denver Water is also concerned that the wildlife habitat management area prescriptions do not provide clear and adequate direction to protect the watershed from fire damage.

Thank you for your attention to our comments and concerns.

Sincerely,

Hamlet Barry, III
Manager

n:\HJB\@envplan\csr\memos\wr_prfmp.doc

W4590

Town of Crested Butte

P.O. Box 39
Crested Butte, Colorado 81224

—A National Historic District—

Phone: (970) 349-5338
FAX: (970) 349-6626

March 21, 2000

White River National Forest
Supervisor's Office
900 Grand Avenue
P.O. Box 948
Glenwood Springs, CO 81602

Attn: Dan Hormaechea, Head Planner

Dear Mr. Hormaechea:

The Town of Crested Butte is located less than 10 miles south of the White River National Forest. The White River National Forest receives frequent usage by our citizens and is greatly cherished as an amazing resource for us all. It is part of the natural attraction of Crested Butte which is the basis for the tourist economy in here.

The Town of Crested Butte supports the Regional Forester's decision to identify Alternative D as the preferred alternative for the Proposed Revised Land and Resource Management Plan for the White River National Forest.

We applaud the Forest Service for giving higher priority to the physical and biological resources than to human uses of the Forest. We agree with protecting Colorado's shrinking wildlife habitat which is of critical importance to our town. Crested Butte welcomes management strategies that **protect** the land and resources while **preserving** what is special for future generations. We believe that in following this ethic, we all win in the long run.

We support the plans' goal of reigning in the destructive use of off road vehicles on unauthorized trails. We agree that the unauthorized use of these off road vehicles has created too may **improper** trails that do not comply with valid design standards and negatively impact the Forest and other users with erosion, fragmentation of wildlife habitat, diminished watershed quality and loss of backcountry peace and solitude.

The Town of Crested Butte encourages the Forest Service to hold firm to Alternative D. Our citizens and our tourists, who are the mainstay of our economy, value the many year

W4590

round recreational opportunities that the Forest provides us. Recognizing that the people of Crested Butte and our tourists use the Forest a great deal, we support the proposal in Alternative D to place low emphasis on new developments for human uses or recreation, including expansion of ski areas, because our residents and our tourists are people who appreciate the value of a natural forest, not a "developed forest". We do not want to see our Forest consumed and dominated by industrial uses of our public lands.

We acknowledge that some trails may be closed. At one point it seemed that the East and West Maroon trails might be included. Now that they will remain open, we feel that for safety reasons, and to protect the forest from wandering hikers, these trails should remain signed.

On behalf of the Crested Butte Town Council, I thank you for the opportunity to comment on the Draft Environmental Impact Statement and the Proposed Revised Land and Resource Management Plan for the White River National Forest.

Sincerely,

Linda Powers

Linda Powers,
Mayor.

W4702

OPEN SPACE & TRAILS DEPARTMENT

970-668-4200
fax 970-668-4225

Post Office Box 5660
0037 SCR 1005
Frisco, Colorado 80443

March 30, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Please accept these comments of the Summit County Open Space Advisory Council on the proposed Revised White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). Our Council is officially appointed by the Summit Board of Commissioners. One of our primary responsibilities is to advise the Board of County Commissioners and the planning commissions on open space and trails issues, usually as they relate to master plans. As such, the particular focus of our comments is on the way the Forest Plan impacts open space and trails uses in Summit County.

As you know, Summit County has held numerous meetings to discuss and receive public comment on the Forest Plan and DEIS. The Open Space Advisory Council specifically held three public meetings in October and November of 1999 to discuss open space and trails issues in the Forest Plan.

Before making any specific comments, the Council wants to express our thanks for the work of the U.S. Forest Service to date on the proposed plan. We support many of the concepts of Alternative D (e.g., environmental protection, wildlife emphasis, biodiversity). Alternative D is a good place to start from, but needs modifications. The following comments elaborate on this. Please closely consider our suggestions as you draft the final plan.

Travel Management

The Council and the public feel strongly that all areas currently designated for non-motorized use should maintain their non-motorized character. There are too few areas in the County that have a non-motorized designation outside of designated wilderness areas. These areas provide a distinct and more primitive recreation experience for users without having to directly interface with motorized uses. Because the southern half of our County does not contain designated wilderness areas, it is critical to maintain these non-motorized areas. One example of where this issue is of concern is the west side of the Tenmile Range. Under the preferred Alternative D, the west side of the Tenmile Range would receive a management prescription that would potentially allow for motorized use. We feel this is inappropriate and would jeopardize the existing open space qualities of the area. We have the same concerns with other areas in the

County which are currently designated non-motorized that could potentially have motorized uses as a result of the proposed Forest Plan. Please consider a management prescription such as Backcountry Recreation Non-Motorized for these areas.

Regarding the proposed travel management plan, we find that the plan is incomplete in its inventory of trails and needs further work. The travel management plan should be separated out from the Forest Plan, allowing adequate time for more in-depth trail identification and analysis. An increased effort is needed to identify trails and include them in the Forest Service system, where appropriate.

We also have the following recommendations regarding trail issues:

- Reroute trails around environmentally sensitive areas (i.e., wetlands, critical habitat areas), or if necessary obliterate trails to avoid environmental impacts.
- Maintain important trail connections and trail loop opportunities and, where consistent with ecosystem protection, maintain trail densities for both system and non-system trails.
- Utilize a combination of trail closures, trail reroutes, seasonal closures, and new trail construction.
- Standardize and improve signage of County trails.
- We agree with the policy that trails should be closed unless signed open.
- Horse traffic should be separated out from foot traffic in the travel management plan. The two uses have potentially different impacts.
- Intergovernmental coordination should be mandatory when addressing trail management issues in areas of interspersed public and private lands.

Roadless Areas and Recommended Wilderness

At a minimum, inventoried roadless areas should receive a management prescription that maintains their existing roadless character. These areas serve a number of special open space purposes, including provision of scenic integrity and protection of wildlife habitat. They also provide passive recreational experiences and opportunities for solitude not found in most areas of the County outside our two wilderness areas. Furthermore, we feel that timber harvest is not appropriate in these roadless areas. The introduction of roads for timber harvest purposes would change the character of the forest. It is important to maintain these areas as roadless so that future consideration of these areas for wilderness designation is not precluded. We also recommend that developed recreation sites not be allowed in roadless areas as the high level of activity often associated with such sites is incompatible with maintaining the character of roadless areas.

In addition to maintaining the suggested roadless status, we feel that five of the inventoried roadless areas should be assigned a 1.2 Recommended Wilderness management prescription. These areas are Black Lake East, Black Lake West, Ute Pass, Acorn Creek, and Tenderfoot. We recommend Black Lake East and Black Lake West for a Recommended Wilderness management prescription because of the important habitat the areas provide for elk and other species, and because of their immediate adjacency to the Eagles Nest Wilderness. Similarly, Acorn Creek and Ute Pass are worthy of a Recommended Wilderness prescription because of habitat values, solitude opportunities, and immediate adjacency to the Ptarmigan Peak Wilderness. All four of these areas provide logical extensions to the existing wilderness boundaries. The Tenderfoot area contains some critical habitat both for rare alpine plants and for the movement of wildlife. The Tenderfoot area provides the southern access to the Continental Divide land bridge, allowing wildlife to move from south to north without encountering I-70. Because of these attributes and its opportunities for solitude, the Tenderfoot area is worthy of a Recommended Wilderness management prescription. As stewards of the County's open space program, our Council feels that these five areas would play an important role in maintaining the primitive open space values that are so valuable both to our residents and wildlife.

Ski Area Prescriptions

W4702

As the County's Open Space Advisory Council, one of our missions is to see the existing open space values of the County protected. As such, we have serious concerns with continued expansion of ski areas as those expansions potentially have a number of impacts on wildlife habitat and movement corridors, visual resources, and other environmental resources. Developed downhill skiing facilities do not conform with the County's criteria for open space. They also displace other types of recreational uses (i.e., backcountry skiing, snowshoeing). We therefore recommend that ski area management prescriptions be limited to the ski areas' existing permit boundaries. In most cases (i.e., Keystone and Copper Mountain) this will still allow ample opportunities for additional skiing expansion.

Aerial Transportation Corridors

Under several Forest Plan alternatives aerial transportation corridors are proposed. These aerial corridors are inconsistent with preserving the open space character of our undisturbed mountain backdrops. We have concerns not only with visual impacts of such facilities but also with the potential impacts to wildlife, recreation, and the environment. Possible transportation benefits of such aerial corridors seem inconsequential compared to the environmental impacts potentially created. An example of potential impacts is the proposed aerial corridor from Copper Mountain over the Tenmile Range to Breckenridge. The west side of the Ten Mile Range is currently an undeveloped, pristine mountain setting, as viewed from Copper Mountain and Hwy 91 (a National Scenic Byway). The west side of the range is also traversed by the Wheeler/Colorado/Continental Divide Trail, a federally designated National Scenic Trail. The existing qualities of these travel corridors should be preserved. An aerial corridor over the Tenmile range would impact these and other environmental qualities.

Vegetation Management

There is little disagreement that some of the lodgepole pine forests of Summit County need some type of active management to reduce risk of fire, disease, and to provide more diverse habitat conditions. However, the extent of logging proposed and the "aggressive management" strategy described under Alternative D are alarming and we are not convinced that such a strategy is justified. Based on the most recent revised data provided by the U.S. Forest Service, under Alternative D almost half of the total projected timber harvest on the entire White River National Forest would occur in Summit County in the next ten years. We support a less aggressive approach to timber harvest, emphasizing selective cutting that minimizes roads, minimizes visual and environmental impacts, and protects water quality.

Timber harvest (particularly clear-cutting) can have several significant impacts on water resources, such as increased sediment loads in water bodies and increased phosphorus loading. We recommend that as part of mitigation for any proposed timber activities, that the Forest Service be required to monitor all timber activities to ensure that phosphorous loading in streams/lakes does not increase as a result. Phosphorus loading is of particular concern because the State has set regulatory standards for phosphorus in Dillon Reservoir and the community has spent millions of dollars on advanced treatment to maintain water quality in Dillon and Green Mountain Reservoirs. We are also concerned about potential wildlife habitat fragmentation associated with road building for timber harvesting activities. Some areas of the County currently have a high density of roads. New roads for timber harvest are likely to receive substantial recreational use even if attempts are made to close them. As such, we request that existing roads be utilized for timber management and new roads be avoided.

In addition, clearcuts can have significant visual impacts. These impacts are of major concern because the Summit County economy largely relies on visitor enjoyment of the pristine mountain scenery. Please

reconsider the "aggressive management" approach proposed for timber management and instead take a more moderate approach towards vegetation treatments. None of the other five alternatives in the DEIS would involve nearly the amount of harvest in Summit County as proposed under Alternative D, yet it is our understanding that all of the alternatives have been designed to ensure maintenance of a healthy forest.

Intergovernmental Coordination

The proposed Forest Plan lacks discussion regarding coordination of forest activities with local governments and there is no requirement for consideration of local master plans in national forest decisions. Federal law requires that when developing national forest plans, local governments shall be consulted and consideration must be given to locally adopted plans. We feel that these issues of local coordination and consistency with locally adopted master plans must be addressed if the Forest Plan and implementing activities are to gain acceptance from the public. Federal law specifically requires that the environmental impact statement for a forest plan include:

1) Consideration of the objectives of other Federal, State, and local governments, and Indians tribes, as expressed in their plans and policies.
2) An assessment of the interrelated impacts of these plans and policies
3) A determination of how each Forest Service plan should deal with the impacts identified: and
4) Where conflicts with Forest Service planning are identified, consideration of alternatives for their resolution. (Code of Federal Regulations, Title 16, Part 219.7)

The Draft Environmental Impact Statement for the Forest Plan does not include the above-required analysis. There are several examples that we can provide where past coordinated planning between the Forest Service and the County could be jeopardized by the proposed plan. For example, coordinated Forest Service and local efforts have resulted in development of a trail system in the Soda Creek area. Under Alternative D many of the trails in this area would be closed to mountain bikes to protect elk habitat. Although the area may indeed be critical for habitat purposes, there needs to be recognition of the coordinated efforts that have occurred in the past regarding trail development and an effort to consider trail access in the area. It is our concern that although we have enjoyed a good working relationship with the local ranger district, decisions made in the Forest Plan will preclude past efforts or hinder future coordination efforts. Therefore, we request that the following policy be added to the objectives listed under Goal 3.4 Public and Organizational Relations, of the Goals and Objectives section of the Forest Plan:

"Objective 3.4d. Cooperatively work with local governments to address issues of common concern and to the maximum extent possible maintain consistency with locally adopted master plans."

Furthermore, we suggest that the Standards and Guidelines section of the Forest Plan include the following to implement the above goal:

Standard: To the maximum extent possible, ensure that national forest management decisions are consistent with locally adopted master plans.

Guideline: Forest Service special use permits shall be referred to local government and local planning commissions for comment. Use permits shall not be issued unless the proposed activity maintains consistency with local master plans.

Our Council has also noted that the management prescriptions around urbanized areas such as Soda Creek and Wilderness do not always accurately reflect the interface of uses that occurs in these areas. For that reason, we have looked at the 7.1 Intermix management prescription as a possible tool to use in some of these urban interface areas. Although some of the particulars of 7.1 are too open-ended in terms of the

types of uses permitted, we nevertheless support the theme of the Intermix prescription and request that the Forest Service investigate the possibility of utilizing the theme in some of these urbanized locations.

Land Ownership Adjustment Analysis

Our local ranger district office held numerous public meetings and discussions several years ago to determine appropriate boundaries for the Land Ownership Adjustment Analysis (LOAA). These mapped boundaries indicate areas that the Forest Service is interested in acquiring ownership in, as well as identifying national forest lands that could be disposed of. The proposed Forest Plan discusses LOAAs but does not require any type of process that the Forest Service is required to go through in developing and updating such boundaries. We recommend that the standards and guidelines section of the Forest Plan contain a requirement that LOAAs be adopted and amended using a community involvement process.

Finally, we would like to commend the Forest Service on your efforts in developing a new forest plan for the White River National Forest. We know this has been a monumental undertaking. The 1984 plan is outdated and definitely needs to be revised. We support your efforts to accomplish this. Please then take the comments we have provided in the constructive manner in which they are intended. We think that working together, we can craft a plan that addresses local needs while preserving the open space values of our forest for future generations of humans and wildlife.

Sincerely,

Robert Ray
Chairman, Summit County Open Space Advisory Council

Cc: Board of County Commissioners
Lyle Laverty; Regional Forester
Jamie Connell, District Ranger
Senator Wayne Allard
Senator Ben Nighthorse Campbell
Representative Scott McInnis
State Senator Bryan Sullivant
State Representative Glenn Scott
Summit County Open Space Advisory Council
Frisco Open Space Advisory Council
Breckenridge Open Space Advisory Council
Steve Hill, Community Development Director
Jim Curnutte, Planning Director
Gary Severson, Northwest Council of Governments

G:majproj\white river nf plan\osac forest plan letter

W4809

Town of Breckenridge Response:

White River National Forest
Land and Resource Management Plan, Draft Environmental Impact Statement, and Travel Management Plan

April 2000

Prepared for:
White River National Forest, Supervisor's Office
White River National Forest, Dillon Ranger District
Senator Ben Nighthorse Campbell
Representative Scott McGinnis

Prepared by:
Breckenridge Town Council
Breckenridge Open Space Advisory Commission

W4809

Est. 1859
BRECKENRIDGE
Colorado's Kingdom

April 4, 2000

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Ave./P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

With this letter the Breckenridge Town Council would like to submit its comments on the White River National Forest Land and Resource Management Plan, Draft Environmental Impact Statement (DEIS) and the Travel Management Plan. These comments are intended to represent the general citizenry of the Town of Breckenridge.

We feel that there has been a great deal of collaborative effort from the communities within Summit County in addressing this Forest Plan. For this reason, we have chosen to channel our specific responses through other entities (namely the Breckenridge Open Space Advisory Commission (BOSAC), which has specific expertise in the areas in the areas of natural resources and trails), rather than submit an entirely new set of comments and recommendations. We whole-heartedly endorse the BOSAC position. The BOSAC members committed large portions of many of their meetings to addressing the Forest Plan and hearing public comment. We would hope that the Forest Service would look carefully at their in-depth analysis of the open space and trail issues addressed in their response letter.

At the same time, we have been and will continue to work together with the Board of County Commissioners on their comments as they relate to the Upper Blue River Basin.

We appreciate the time that the Forest Service has committed to this process and hope that you will respect the amount of effort that individual citizens and local communities in Summit County have put into these comments.

Sincerely,

Stephen West
Mayor

Town of Breckenridge
150 Ski Hill Road • P.O. Box 168 • Breckenridge, Colorado 80424
(970) 453-2251 • FAX (970) 547-3104
www.townofbreckenridge.com

W4809

Breckenridge Open Space Advisory Commission
Memorandum
April 4, 2000

W4809

Memorandum

To: Martha Kettelle, White River National Forest Supervisor

From: Breckenridge Open Space Commission

CC: Summit County, Northwest Colorado Council of Governments, Senator Campbell, Representative McGinnis

Date: 04/11/00

Re: White River National Forest Plan Revision

The Breckenridge Open Space Commission was asked to make recommendations to the Breckenridge Town Council in response to the White River National Forest Plan Revision of 1999. As a commisssion we have spent portions of our meetings over the last six months deliberating the myriad of issues, discussing our ideas with staff, listening to user group presentations, and conducting individual research. Through these interactions and discussions, we have reached a level of consensus on the issues we feel are relevant to our mission as a commission. As BOSAC's realm of influence includes open space and trails, we used the Town Open Space Plan and our Trails Plan to guide our analysis and comments. The following is a synopsis of our response to the Forest Plan:

I. Relationship between locally approved master planning documents and Forest Service planning process

The Town of Breckenridge has invested considerable resources into the protection of open space and recreational opportunities. To guide the definition, maintenance and protection of important open spaces within the Town and within the Upper Blue River Valley, the Town adopted an Open Space Plan and a Trails Plan. In reading these plans, it is clear that protection of the interface between the Town open space and trails and the surrounding County and Forest Service resources is crucial.

The Open Space plan states directly that *"there are two very important players in open space protection … Summit County and the U.S. Forest Service." "The Town has … had a relationship with the USFS for years due to the ski area permitting here, but also because their land management policies affect the Town's planning." (p. 2).* Part of the reason Breckenridge is such a unique and popular resort town is the effort that has been made to provide open space opportunities within and surrounding the Town and the access that has been maintained to the vast expanse of other public lands beyond the Town boundaries. **For this reason, decisions made on the Forest Service lands directly impact the effectiveness of our open space and trails conservation efforts.**

The highest priority characterization of land protection identified in the Open Space Plan contains three general land categories: natural resources, recreational land and scenic land. Under the natural resource category, environmentally sensitive areas and wildlife habitat are considered foremost. Environmentally sensitive areas are those with wetlands; perennial water-ways, streams or drainages, riparian or alpine zones, steep slopes, buffers to such areas, unique land forms or threatened or unique plant communities. Specific wildlife habitat protection values considered important are: protection of important habitat enhancing the health of the animal community and promoting biodiversity; enlargement of important habitat areas through preservation of adjacent tracts; preservation of wetland and riparian corridors essential as wildlife habitat; protection of rare and unique landscape elements, such as cliffs, old growth trees, native vegetation, and riparian zones; connections between wildlife habitat parcels, including corridors for movement; maintenance of significant ecological processes such as flooding, fires, and wind throw; contributions to the regional survival of rare species through local habitat protection; balance of public recreation with wildlife habitat needs; identification of more critical wildlife habitat areas, and development of preservation goals to preserve the more critical areas; and maintenance of large, intact patches of native vegetation by preventing fragmentation. It is evident that these conservation priorities cannot be addressed without a similar management approach from the County and the Forest Service. The plant and wildlife communities in the Upper Blue River Valley do not distinguish between the various land ownership boundaries. To ensure a healthy environment, these communities should remain as intact and contiguous as possible.

The main priorities identified under the recreational land category are access to and enhancement of public lands, waterways and backcountry recreational areas; trails; passive recreational parcels; and trailheads. Although the passive recreational parcel category deals more with in-town parcels providing a buffer from development, the other three categories interface with Forest Service resources directly. Breckenridge is known for its trail and backcountry recreational opportunities. The resources we can provide within the Town itself, however, are limited. Our trails system has evolved and continues to evolve largely out of a need to provide connection and access to the other surrounding public lands. Considering the acquisition, construction, and maintenance efforts that the community has committed to retaining these connections, it is very important to us that the other public land management agencies work to do the same.

Preservation of scenic lands is also a priority in open space acquisition and management for the Town. The natural landscape surrounding the Town defines it's character. Although human activity will continue to change the character of the landscape, the Town will continue to strive to preserve the magnificent vistas and intimate spaces that make Breckenridge so inspiring and beautiful for residents and visitors alike. The gateway to Town, including the lands separating communities and those views from the highway corridor, is important to protect in order to enhance the entrance to Town. In addition, conservation of the hillsides, ridgelines, and dramatic views of the mountain backdrop is of utmost importance to the Town. Much of the land that comprises such views and features is, again, outside of our Town limits and within the Forest Service jurisdiction. For this

reason, we are reliant upon the agency to make decisions that will not negatively affect these visual resources.

Lastly, our Trails Plan was created out of a "need to preserve and expand summer and winter recreational opportunities in Breckenridge and Summit County. Many residents of Town feel that the identity of the community is strongly tied to the quality of recreational opportunities available. The fact that Breckenridge is such a small town means quicker, easier access to more rural backcountry trails."(p.1) The Trails Plan reinforces the need to plan for and maintain *"trail connections with out-of-town destinations and trails under the jurisdiction of the County and the U.S. Forest Service."* In addition to the staff and Council time it takes to create and maintain the trails within our Town system, developers and other private landowners have committed resources to do the same. We feel that the Forest Service should recognize both the investment already made in the access and interface with its trails, as well as the potential for partnership opportunities in the creation, maintenance, and rehabilitation of sustainable trail networks that extend beyond land ownership boundaries.

Given these master plan documents and the effort that the Town staff and elected officials and volunteers have committed to ensure their effectiveness and implementation, we hope the Forest Service would recognize this effort for the stewardship plans that they are and reinforce and compliment our plans in the Forest Plan revision. In light of this, we have several comments that we would like to submit in response to the proposed plan and preferred management alternative identified by the White River National Forest. The Town of Breckenridge is obviously a major stakeholder in this planning process and feels that our concerns need to be carefully addressed by the Forest Service management.

II. Response to theme of Preferred Alternative D

It is stated that Alternative D was "developed to respond to concerns that wildlife habitat for a wide variety of species, as well as biological diversity, be given special emphasis." BOSAC agrees whole-heartedly with this direction, as it corresponds directly with the focus of our Open Space Plan. However, Alternative D also "includes the idea that a higher priority be given to physical and biological resources than to human uses of the Forest." We do not necessarily subscribe to this idea. Urban growth is a reality in Summit County. We are the winter playground for not only the residents of the Front Range of Colorado, but also much of the rest of the state and the country. Although we recognize that this Alternative does not purport closing off the Forest to outdoor recreationists, we are concerned that the Forest Service may de-emphasize the opportunities for manageable types and levels of human recreational use and presence that are important to the adjacent communities.

The stated methodology of Alternative D in achieving its objectives "emphasizes active management of all habitat types, including the use of timber harvesting, prescribed fire, and structural improvements. It represents an aggressive approach to habitat management and places a low emphasis on letting natural processes run their course. It will use active management to make the most rapid progress … toward a diverse, healthy ecosystem condition." BOSAC very much disagrees with this approach. As indicated above, our Open Space Plan strives to protect natural ecological processes. We do not suggest entirely precluding the limited use of techniques

such as selective thinning and prescribed burns to improve habitat and reduce fuel loads where necessary. At the same time, however, we feel strongly that the emphasis should be on allowing *natural* processes (such as fire, insects, disease, nutrient cycling, predation, etc.) to achieve a healthy and biologically diverse forest. After establishing what we thought to be the most appropriate management prescriptions and forest management techniques for the Upper Blue River Basin to achieve the desired level of forest health and aesthetic quality, we determined that Alternative I was a much better fit for most of the area of our concern.

Beyond the stated objective of Alternative D, we can not support the premises and the substance of the alternative. We believe, for example, that the 4,030 million board feet of sawtimber to be harvested per year in the Blue River Basin under Alterative D is completely inappropriate. This represents 45% of the timber harvest volume for the entire Forest, even though this basin only represents 14% of the Forests total acreage. Not only do we disagree with the use of this intensive management technique, we oppose the high level at which it will be practiced in our immediate visual and recreational vicinity and the impacts to water quality that our basin will experience.

Because there are a number of inconsistencies and contradictions within Alternative D, in our opinion the implications vary as well. We support the restriction of motorized travel to designated routes and the obliteration of unnecessary roads that cause resource damage. At the same time, we feel like the policy of restricting mechanized travel to those trails that are specifically designated as open is unrealistic. We support the development and use of management prescriptions that focus on wildlife species of concern, such as elk, lynx and wolverine. We, however, do not support the use of timber harvesting as a key habitat management technique within these prescription areas. We support the expanded use of the Special Interest Area prescription to protect sensitive plant species in the Upper Blue. At the same time, we feel like the decreased protection for those areas previously identified as roadless could be very detrimental and contradictory to the Federal government's new initiative for roadless area conservation. The following section will go into further detail on our concerns and suggestions pertaining to the management prescriptions and their standards and guidelines used by the identified preferred alternative in the Upper Blue.

III. Comments on the Management Prescriptions for the Upper Blue River Valley

The management prescriptions in the Upper Blue Basin should follow those of Alternative I with a few exceptions (see Appendix A, Town of Breckenridge Management Prescription Recommendations for the Upper Blue River Basin). We agree with the basis of Alternative I in supporting the use of natural processes in maintaining ecosystem health and emphasizing the protection of non-motorized recreation opportunities. We also feel that the prescriptions used in Alternative I in the Upper Blue more adequately address the protection of biological diversity within the context of urban growth. With a few modifications, we found ourselves to be largely in agreement with the management area prescriptions and boundaries of Alternative I.

Those areas currently identified as roadless areas should have management prescriptions that maintains their roadless character, whether that be through the wilderness prescription or other appropriate management prescriptions. Preserving roadless areas means that no new roads

should be created even for the purpose of timber harvesting or habitat "improvements." Our recommendation for the Upper Blue region is to continue to manage Hoosier Ridge area as a Research Natural Area (as depicted in Alternatives B, D, and I). We would also advocate protecting the area from McCullough Gulch to the crest of the Tenmile Range as a Research Natural Area or a Special Interest Area – Minimal Use and Interpretation (as depicted in Alternative I). We would also like to see the parcel in the Cucumber Gulch area managed by the Forest Service (the "Wedge" parcel) to be protected as a 2.1 Special Interest Area

Those areas that currently are designated as non-motorized should maintain this characterization, preferably through the Backcountry Non-Motorized management prescription (1.31). We agree with the boundaries and delineations of Alternative I for the use of prescription 1.31 for the entire Upper Blue River Basin.

Although we do not advocate a net increase in motorized use areas, there are some areas where it currently and historically has occurred that should be preserved. These areas should be managed for a combination and balance of non-motorized and motorized use. This means allowing for designations where appropriate. We agree with the Alternative I delineation of the Dispersed Recreation prescription (4.3) in the areas of Spruce Creek/Crystal Creek, the upper drainage of the Swan River, and the lower portion of McCullough Gulch (near Hwy 9). The are a few other areas, however, where we would alter the boundaries from that of Alternative I. One is the area upslope from Blue Lakes to Hoosier Ridge. This area is currently designated as non-motorized and should remain so. Additionally, we believe that the entire area designated as Backcountry Recreation-Year-round Motorized (3.31) by Alternative I in the Upper Blue should be Dispersed Recreation (4.3). Although many of these areas receive motorized traffic, it should not necessarily be the focus of management efforts. Prescription 4.3 allows for there to be equal attention given to non-motorized travel.

This will be particularly important in the Golden Horseshoe area where the Town and the County have been very involved in acquisitions of backcountry properties. As more of the parcels in this area become part of the open space program, there will be more of a need to protect non-motorized use in any area that has been extensively used by motorized vehicles in the past. The Golden Horseshoe Project will be making management recommendations regarding trail use and conditions that should be taken into account in this area. We would also like to emphasize the need to remove the current 8.25 Ski-based Resort prescription that covers the area of Parkville and the upper drainage of the South Fork of the Swan River. This is an inappropriate use for this area.

The Intermix prescription (7.1) should be considered for specific areas within the Upper Blue River Basin. The use and condition of the White River National Forest lands in the Upper Blue River Basin are very connected to its rapid urbanization. This area is a playground for not only the local residents, but also the many visitors from the Front Range and elsewhere. As indicated in the Executive Summary, Alternative H, whose theme addressed this urbanization issue specifically, was eliminated from further analysis during the planning process. Although we feel like this was a mistake, at this point we recommend that the urban interface areas be addressed specifically with the 7.1 Intermix prescription. We would like for this prescription to be applied to the Peak 7 and Peak 8 base area and the area to the west of the crest of Gibson Hill (east of which

will likely become part of the Backcountry Zone in the Upper Blue) in the Golden Horseshoe. As mentioned above, Cucumber Gulch should be separated out for further protection under a Category 1 or Category 2 prescription. We are suggesting the 2.1 Special Interest Area designation. These areas we recommend as 7.1 prescription areas include a combination of public and private land, historical use patterns, and lie at the urban interface.

Urban growth is a reality under any management regime in the Dillon Ranger District. Prescription 7.1 addresses this issue in those areas where urbanization drives the land use. These areas are those in which there is a matrix of Forest Service, private and local government property. There should be allowances for cooperative, site-specific planning and management in these areas, some of which are currently the focus of interagency/multijurisdictional management efforts (such as with the Golden Horseshoe Project). The location of the Land Ownership Adjustment Analysis line in these areas is an issue that must be addressed through any cooperative management plan established under prescription 7.1.

One other management prescription of note is Deer and Elk Winter Range (5.41). We recommend this for use by the Forest Service in the Soda Creek area, as depicted on Alternative I, but with a few caveats. We recognize that this level of protection means a reduction in trail densities in this area. As we mention in the Travel Management Plan discussion, trail restrictions and closures will be tolerated so long as there is strong scientific evidence supporting such decisions and alignments, connections, and loops are maintained through the use of other trails. Also, we would like to see the second sentence of the first paragraph under the 5.41 Desired Condition discussion deleted. This sentence states that "Activities may include burning, rangeland management, timber harvest, habitat manipulation, recreation, minerals exploration and development, and road management." This sentence seems contradictory to the rest of the prescription and the minimum impact emphasis in the Standards and Guidelines and we recommend that it be deleted. We believe that there is a strong argument for using this prescription in this particular area, but we would also like to emphasize the importance of looking closely at the trail needs and collaborating with the user groups. This area receives a great deal of use by both wildlife and recreationists and will be important to arrive at a good balance in providing space and resources for both.

In addition to the specific remarks related to management prescription applications, we have some general comments to add as well. For one, with respect to any prescription, we feel that vegetation management should be done only when absolutely necessary and with the least impact to aesthetic quality, water quality, environmental health, and the backcountry recreation experience. Timber harvesting and related road construction should be 1) kept to a minimum, 2) done only with scientific evidence supporting its necessity for forest health and wildlife habitat protection, and 3) utilized as a last resort when all other management options have been exhausted. We do not accept the utilization of this activity as a source of revenue, and we insist in the selected instances where it is necessary that its impacts not be visible from the Valley floor, scenic corridors, or recognized recreational trails. For the same aesthetic reasons, we do not feel that aerial transportation corridors should be permitted over the Ten Mile Range or between the Swan River drainage and Keystone. The restriction of timber cuts and aerial transportation routes is consistent with the maintenance of the mountain backdrop and scenic corridor objectives in the Town Open Space Plan.

IV. Response to the Travel Management Plan

We do not agree with the decision of the Forest Service to combine the NEPA processes for the Forest Plan and the Travel Management Plan. Most National Forests will separate the two processes and allow for independent public scoping. We feel like neither document receives the attention it deserves through combining the analyses, but we think that it is very important for the local Dillon Ranger District and the community to have sufficient time in the field to evaluate the Travel Management Plan. This is especially true in light of the proposed "closed until designated open" trail policy. Given the extent of the trail network in this county and the lack of funding within the local district, we believe it will take at least one field season (two would be more practical based upon the density of trails) for the local residents and user groups together with the Forest Service to field-verify the condition and appropriateness of the trail use designations in the Travel Management Plan.

We feel like the trail closures identified in the Travel Management Plan should be substantiated with the scientific evidence that was used as the basis for the decision. This information was provided to a larger extent with road closures than with trails, but was inadequate across the board. The Forest Service has acknowledged that it will be requesting the support of both the local governments and the user groups in self-enforcing partial and complete closures. This will be difficult for the community to buy into without comprehensive understanding of the rationale behind the designations.

In addition, the Town has expended considerable resources in developing our own trail system. This network was designed to connect with County and Forest Service trails. The maps with these Town trails show connections to Forest Service routes. Because of the efforts put into obtaining easements, trail construction and maintenance, signage, and trailhead development, we feel that any of the existing and established Forest Service trails ultimately linking to those of the Town should remain open. There needs to be substantive scientific evidence indicating that the environmental impacts of use on any of these trails necessitate its closure. If this were the case, the Town would need to make alterations to our current signage and marketing literature to avoid creating an attractive nuisance.

BOSAC would recommend that in the event of biological concerns, closures be considered only as a last resort. Seasonal restrictions have been very successful in the Upper Blue Basin as a result of strong user buy-in and support. To address erosion, wildlife movement, or wildlife breeding periods, impactive trail use could be restricted seasonally. Such a measure would be much easier to support from a community perspective. BOSAC would also ask the Forest Service to verify that attempts have been made at managing a trail before closures are dictated. There are several areas where any combination of restricting certain uses on portions, re-aligning sections, rehabilitating eroded areas, or seasonally restricting use could prevent the need for closure.

Habitat fragmentation is a real concern in this county, with the combination different types of development and the road needed to serve them. Backcountry trail use contributes as well. Although we can understand that trails will fragment habitat, the need for separation of non-motorized uses is unsubstantiated. We feel that if a trail is deemed to have a necessary trail

closure for the purposes of habitat fragmentation, that it should be closed to all non-motorized users. There may also be some instances where use should be separated because of social impacts or conflicts, but otherwise non-motorized uses should be considered as one category.

For the sake of protecting wildlife habitat and minimizing disturbance, there should be no net increase in the numbers of miles of motorized or non-motorized trails. We think that some closures and consolidations may be appropriate, if the Forest Service bases its decisions on a completed inventory that has been approved by the user groups themselves. At the same time, we also feel that new trails should be considered to create needed connections or allow for important reroutes or realignments if they have gone through an environmental analysis. In areas of high density use or where there is a mix of public and private lands with a number of interconnecting trails, we would advocate the development of master plans for recreation, similar to the Golden Horseshoe project.

To improve and protect water quality in our Basin, we recommend that the use and condition of motorized travel routes and commercial horse operations and trails be carefully reviewed. There are many badly eroded trails and stream crossings due to the mismanagement of these travel ways and levels of use. Although we feel that equestrian use is generally compatible with other non-motorized use on the Forest Service trail systems, commercial use is another issue altogether. Both commercial horse operations and unmanaged motorized travel have the potential to highly degrade our streams, rivers and wetlands. The Town works hard to manage the impacts developers and non-motorized recreationists have on water quality and we would hope that the Forest Service could do the same for those uses and permittees (including the ski resorts) under their jurisdiction.

We disagree with the "closed until designated open" characterization of trails *unless* there is adequate coordination with and agreement between the local user groups and land managers on which trails were and were not appropriate to designate as open. As we have mentioned elsewhere in this document, we also feel strongly that substantive scientific evidence be used as the basis for these decisions. This coordination and collection of information would, again, require more time than this comment period allows. For example, the analysis needed to make informed decisions on the Travel Management Plan requires at least one field season. In the event that the Travel Management Plan is not given further analysis, we feel that this policy would be unduly restrictive, particularly considering the voids in the inventory used for the analysis.

V. Specific comments on Trail Use Designations under Alternative D

Because the Forest Service has chosen to leave travel on or off trails and roads open to pedestrian and equestrian traffic, we will only be addressing travel management restrictions with respect to mechanized and/or motorized access. With this in mind, we offer the following comments on trail restrictions for the area in the Upper Blue around the Town of Breckenridge:

Trails designated as closed to mechanized use under Alternative D that BOSAC recommends remain open

- NRT 39.1 (Wheeler Trail): The Wheeler Trail is a National Recreational Trail and included in many guidebooks and other literature. The section slated to be closed to mountain bikes is

part of an epic loop that more experienced riders will make. Riders completing this loop start on the Peak 9 road or the southern section of the Wheeler Trail and ride over the crest of the Ten Mile Range between Peaks 9 and 10 and Miners Creek Junction to Copper Mountain, at which point they will return to Breckenridge through any combination of bike paths and trails.

Several of our Town trails provide a link to either the Burro Trail (which accesses the Wheeler Trail) or the Peaks Trail (which is one trail used to complete the 30+ mile loop described above). We are in the process of developing a Peaks-to-Burro Trail through the Town and Breckenridge Ski Resort that would, with the help of the ski area, officially make this entire connection. The section of the Wheeler Trail referenced is a nice section of alpine single track that enhances the riding in this particular part of the County. Not many people use it because of the difficulty in ability level required to get there, but it is a dry and rocky trail that experiences little erosion because of its soil base and the fact that bicyclists travel very slowly over it.

This section of the Wheeler Trail is to be closed based on wildlife considerations. The number of trails crossing over the crest of the Ten Mile Range to be open to mechanized use was limited in order to maintain contiguous habitat. We are supportive of the restriction of dispersed use through this area, but feel that those routes designated to provide the access need to be carefully chosen. Although mechanized use is allowed over the Colorado Trail further north, a more viable connection would need to be devised in order for it to be rideable. We feel that it makes more sense to keep the Wheeler Trail open as the connection for mountain bikes over to the Copper Mountain area. If wildlife disturbance is the issue, we feel like a seasonal closure during sensitive breeding periods for this section of the Wheeler Trail would be more appropriate than complete closure. Seasonal closures may be a moot issue, however, as the Wheeler Trail is only accessible to mechanized travel for a short period of time during mid-summer when the snow pack does not exist. In order to minimize impacts in a sensitive area, we would also be open to closing the Miners Creek Trail to mechanized use if the Wheeler connection were to be maintained. Because of the designation of this section as being part of the Colorado Trail, however, this may not be possible.

- FRD 611.3 (Pennsylvania Creek Road): This is a very popular road that provides mountain bikers with several loop opportunities in combination with the Blue River Trail, the Mt. Argentine Trail (also known as the 360 Loop), and links to Hoosier Ridge, the Indiana Creek valley, and Boreas Pass. The Forest Service has recognized erosion as the primary problem on this road, but we would argue that the high level of motorized use is much more detrimental than the mechanized use. BOSAC is recommending that restrictions on the Pennsylvania Creek Road be delineated as follows: the road would remain open to motorized and mechanized to the point of the first connection with the 611W.2A, at which point it would be closed to motorized, but open to mechanized and other non-motorized users. The loop between 611.1, 611W.2A, and 611W.3A is a particularly important connection to remain for the mechanized users. The upper section of 611.3 (beyond where the main road begins switch-backing) might make sense to close eventually to all users, because of its sensitive riparian characteristics. There should, however, be an attempt to manage it for non-motorized use before this occurs.

The Town is currently working to improve trail connections between Town trails and the Blue River Trail. The Blue River Trail is a very important linkage between Forest Service, County and Town trail systems. The trail system between Pennsylvania and Indiana Creeks up to Boreas Pass is of great importance to the Town. If connections must be closed because of wildlife or other environmental concerns, we would ask that the linkages be retained to maintain the integrity of the trail system in this area.

- Way 80W.1A (SFTS): This single track trail on the Lehman Gulch ski run is sustainable and a good alternative to the highly-used Burro Trail, which actually will remain wet longer. We realize that the Forest Service is working to reduce overall trail density, and we suggest that a smaller master plan be implemented for trails in this general vicinity. There are other trails, such as 801W.1C that would be more appropriate to close, in our opinion.

  In general, because of the area's proximity to downtown and nearby neighborhoods, and the linkage of the Burro Trail with the Wheeler Trail, Spruce Creek, etc. this trail receives a great deal of use. To address the trail density, erosion problems, and high levels of use from pedestrians, mountain bikers and equestrians, we believe this general area should receive some very site-specific planning, perhaps in cooperation with the Town and the Breckenridge Ski Resort.

  The Town is working to develop a simple connection between the Peaks Trail and the Burro Trail through the Ski Resort, as both a summer and winter trail, and it would behoove us to be involved in an effort to clearly designate and maintain a system of sustainable trails in the vicinity of the Burro Trail between the Ski Resort and the Wheeler Trail.

  We also believe that this recommended trail should be closed to commercial equestrian use. There are a number of trails in the Lehman Gulch area that have been severely damaged by the stable operation, and we feel that they have enough loop opportunities through their own trail network without damaging this trail as well.

- Way 3W.2A (SFTS): This is a popular trail for locals from the Peak 7 neighborhood, providing a short loop with the Peaks Trail. It provides a trail for neighborhood residents to walk their dogs, run, snowshoe, nordic ski, or take a short evening bike ride. It also offers relief from the Peaks Trail when it is experiencing a high level of use. This is a sustainable trail that would be practical to incorporate in the soon to be expanded Peak 7 area. At the same time, BOSAC would be supportive of a early season bike closure on this trail, in conjunction with the timing of the closure on the Peaks Trail, to avoid damage to a small boggy area that still needs some work.

- FDR 258.1 (North Fork): This road should remain open for several reasons. For one, it provides a good connection between Georgia Pass and the Middle Fork of the Swan as well as a rare opportunity to enjoy high alpine riding. Any erosion problems might be best addressed by first attempting to restrict motorized use, particularly on a seasonal basis. This road is very established, however, so such a closure might be very hard to enforce. In any event, proper signage will be important in this area.

- Way 569W. 1B (SFTS): This trail, which is located east of Humbug Hill in French Gulch, is narrow, secluded, and a popular route through the aspen hillside for non-motorized users. The flume above it continues to receive a significant amount of motorized use, and this particular trail provides a scenic and safe alternative. The trail is situated on a ditch and not very susceptible to erosion. It is a trail of historical use which is also easily sustainable, with minimal wildlife impacts.

- East Moonstone Trail. The Town now owns the West Moonstone parcel (which lies between CR 503 and Carter Park). Our Trails program has been focusing on the improvement of the West Moonstone Trail, largely because it provides access between the residential area in town and the Juniata Trail and Sally Barber Road. The East Moonstone Trail runs on the East Moonstone parcel north of, but parallel to, Baldy Mountain Road. It begins directly across from the West Moonstone Trail on CR 503. This is obviously not a system trail at the present time, but has received historical use. BOSAC would like to ensure that this trail not only continues to exist, but is vastly improved, for the purpose of contributing to the trail network in this area. This is an example of a trail that we would invest some effort into further delineating, rehabilitating, and maintaining. In the event that the Forest Service conveys this property through a land exchange, the Town and County will work to retain the trail by obtaining an easement through the development process. We have commented elsewhere that the Land Ownership Adjustment Analysis line is an important concept to incorporate into the Forest Plan and Travel Management Plan. We still feel that it should be addressed to a much larger extent than it has thus far in the Forest Plan documents and process.

- Road joining South Fork of the Swan to the Colorado Trail (CT). This trail was not included on the inventory, but is an important link to the Colorado Trail. Although there are parts of it that are privately owned, Summit County has been working to rectify the situation. It provides an attractive loop opportunity for many CT mountain bike rides.

- Central Indiana Creek Road: This road was not included on the inventory. It is the road with the most moderate slope of those that parallel Indiana Creek. The road leads to a beautiful meadow with a cabin. It is in excellent condition as it is dry, a distance from the creek, and experiences little erosion. The road provides a good hour-long out and back ride from Breckenridge. If erosion is the main concern of the Forest Service, we would suggest addressing the motorized use, which has had a great deal more impact in this general area.

- Lincoln Meadows to Humbug Hill: This road was also not included in the inventory. It is the most popular link between Lincoln Meadows and Humbug Hill. The road is very popular and well used as a part of the Golden Horseshoe trails network. The road stays in good condition despite its use by motorized users, mechanized users, equestrians and hikers. Because it is in the shade in areas, it can be wet in the spring. BOSAC recommends that the Forest Service impose a seasonal closure on this road to reduce the potential for erosion.

- American Gulch Road: This road was not on the inventory. It connects Humbug Hill with the South Fork of the Swan. Although there is a mixed landownership pattern along this

road, it is an important connection for trail networks in the French Creek and Swan River drainages. This trail has been used during both summer and winter seasons and continues to stay in good condition. There are many trails and roads within the Golden Horseshoe that have erosion problems, but this is not one of them.

This trail provides many important links. It offers an opportunity for people to access Georgia Pass or the Colorado Trail from the North Fork. There are also numerous routes choices that riders can make from the top of Humbug Hill.

- Golden Horseshoe Area: There are numerous trails in this area between Tiger Road, French Gulch Road and the South Fork of the Swan that are missing from the inventory. Several Town trails in the Highlands area lead directly to this trail network. Both the Town and the developer have invested a lot of time, money and resources into perfecting our trails in this area. It is very important to us to maintain the loop connections and linkages that wind throughout the Golden Horseshoe. Because the landownership and resource issues are so complex in this area, we believe that the best option is to defer to the Golden Horseshoe Project to recommend the most practical and sustainable solutions for recreation management.

- Warriors Mark: There are a number of trails between Warriors Mark, Carter Gulch and Lehman Gulch that are not on the Forest Service inventory. These trails, many of which parallel the ski runs in the area, are widely used by the Breckenridge Stables, locals and visitors. The trails provide a number of loops for mountain biking, hiking, running, cross country skiing or snowshoeing close to town. These trails offer relief from and provide loop opportunities with the popular and populated Burro Trail. The trails stay in good condition because of the amount of sun that they receive.

  The Warriors Mark area is a true urban interface situation. These trails would provide a good basis for the development of true network in this area, which could concentrate use and impacts. The ski resort is close by, as well as an urban residential area and the Main Street corridor. The area will receive use in any event, and by making these system trails and managing them (perhaps in cooperation with the Town), it would create a real community amenity for the residents and the visitors. As it has been mentioned elsewhere in this section of the document, the Town is in the process of developing the connection between the Peaks and Burro trails. BOSAC believes that inclusion of these trails in the cross-town network would be of benefit to everyone. A main issue to address if this network is incorporated is parking for summer users. Potential solutions could also be discussed between the Town and the Forest Service.

Trail closures to mechanized use under Alternative D with which BOSAC agrees

- FDT 58.1 (Spruce Creek Trail): Although this trail lies close to town, provides a number of excellent loop opportunities, and has received a great deal of attention through rehabilitation efforts by the Summit Fat Tire Society, we must support its closure to mechanized use. The trail is very wet, and despite numerous realignment and restoration efforts, it continues to degrade with time. The seasonal closures are helpful, but the trail always remains wet due to

the shade and exposure. Were the Forest Service to keep this trail open, we would continue to support the seasonal closures and maintenance efforts, but we feel that the best approach is probably closure. At the same time, it would be important to find an alternative in the area that would allow for the same type of loop opportunity.

- FDT 44.1 (Upper Crystal Lakes Road): This is not a very popular mountain bike ride and does not provide any loop opportunities. In any event, the lake and its shoreline need to be further protected with buck and rail fencing or similar means. As it stands right now, there are a number of small braided trails around the lake, many of which cross through wetlands areas.

Trails designated as open under Alternative D which BOSAC recommends be closed

- Upper section of 58.1 (Spruce Creek Trail): BOSAC does not see the need to leave the upper portion of this trail open. By closing this segment as well as the Mayflower Lakes Road (58.1A), use could be focused on the most popular and most sustainable routes and the overall trail density could be reduced.

VI. Conclusion

The Breckenridge Open Space Commission and the Town of Breckenridge planning staff have reviewed the White River National Forest Plan and Travel Management Plan extensively. Although the recommendation made to us by the Supervisor's office was to take Alternative D as the template and offer comments within its context, we chose to review it differently. We carefully looked at appropriate management prescriptions on an area-specific basis. We then took the travel management trail and road designations from Alternative D and commented on their appropriateness. The result is a very specific management analysis of the Upper Blue Basin from a community perspective, without the influence of preconceived management directions from the Supervisor's office, Regional Office, or Washington D.C.

After we had conducted our individual analysis, we compared our conclusions with those of the established alternatives within the Forest Plan documents. We are in agreement with the premise of Alternative D, but not the methodology proposed to accomplish the desired conditions. At the same time, we found ourselves largely in agreement with the management prescriptions and the methodology proposed for the Upper Blue River Basin in Alternative I. We feel like the focus of management for the Upper Blue should be on sustainable and appropriate recreation and the protection and conservation of the natural resources through *natural* processes. The aggressive habitat management approach is not something we feel to be appropriate or practical for the Upper Blue region. The timber harvest goals proposed with the preferred Alternative D would result in a disproportionate amount of tree removal and road construction in our National Forest.

One of our main concerns with Alternative D is the reality of the amount of effort it will take to implement it. The Dillon Ranger District is already very underfunded. To undertake the intensive management techniques proposed in Alternative D would take a great deal of financial support, which we are unconvinced can be supplied. The travel management trail restrictions under D are also unrealistic to enforce, particularly because they are unreasonable and unpalatable

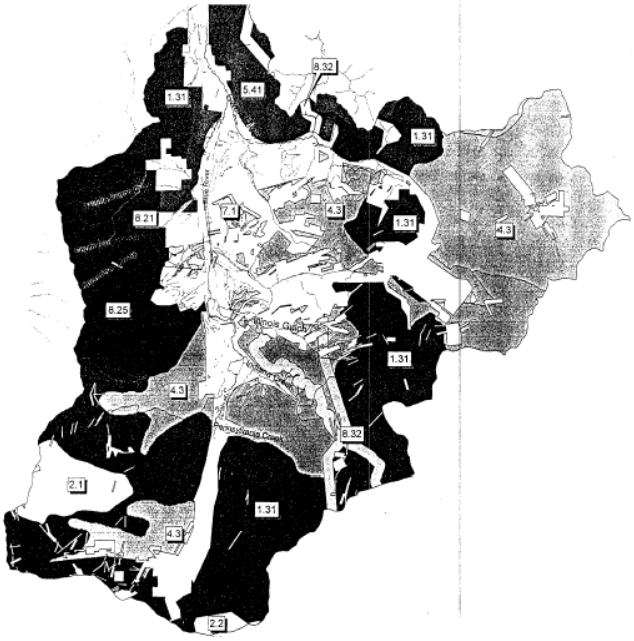
to the local user groups. Because of the needs of our local Dillon Ranger District with respect to volunteer work contribution and community support, we feel strongly that the Forest Plan must be reasonable in terms of protection for the appropriate natural resources and uses while being possible to implement. If the community is able to support the final Forest Plan directives, it is much more likely to participate in creative discussions and investigation of alternative funding mechanisms.

W4809

Appendix A:
Town of Breckenridge Management Prescription Recommendations
For the Upper Blue River Basin

Town of Breckenridge
Management Prescription Recommendations

W4809





0.7 0 0.7 1.4 2.1 Miles

Streams

Management Prescriptions

- 0.01 Non Forest Lands
- 1.31 Backcountry Recreation - Non-Motorized
- 2.1 Special Interest Areas
- 2.2 Research Natural Areas
- 3.31 Backcountry Recreation - Yr Round Motorized
- 4.3 Dispersed Recreation
- 5.41 Deer & Elk Winter Range
- 7.1 Intermix
- 8.21 Developed Recreation Complexes
- 8.25 Ski-based Resorts - Existing and Potential
- 8.32 Designated Utility Corridors

W4968

PLANNING DEPARTMENT

970-668-4200
fax 970-668-4225

Post Office Box 5660
0037 SCR 1005
Frisco, Colorado 80443

March 6, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Please accept these comments of the Ten Mile Planning Commission on the proposed Revised White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). Our comments are particularly focused on issues related to the Tenmile Basin in the Dillon Ranger District. Our area of interest generally extends from Frisco west to Copper Mountain and then to the divides at Fremont and Vail Passes.

As you know, Summit County has held numerous meetings to discuss and receive public comment on the Forest Plan and DEIS. The Ten Mile Planning Commission specifically held three public meetings in October and November of 1999 to receive public comment on a number of issues of particular concern to our basin. The Ten Mile Planning Commission is officially appointed by the Summit County Board of County Commissioners. We are responsible for the development of basin and subbasin master plans within our geographic boundaries. We are also responsible for reviewing all major private, public, and quasi-public development proposals in the basin (i.e., Copper Mountain), as well as 1041 permits. The U.S. Forest Service presents all major special use permits to our commission as a way of facilitating both public and commissioner comment.

Our comments that follow thus represent the views of the public within unincorporated areas of the Ten Mile Basin, based on public comments received at our meetings. The Town of Frisco will likely submit their own separate comments on the Forest Plan.

Before making any specific comments, the commission wants to express our thanks for the work of the U.S. Forest Service to date on the proposed plan. We support many of the concepts of Alternative D (e.g., environmental protection, wildlife emphasis, biodiversity). Alternative D is a good place to start from, but needs modifications. The following comments elaborate on this. Please closely consider our suggestions as you draft the final plan.

Travel Management

The commission and the public feel strongly that all areas currently designated for non-motorized use should maintain their non-motorized character. There are too few areas in the County that have a non-

W4968

motorized designation outside of designated wilderness areas. We are especially concerned with maintaining the non-motorized character of the west side of the Tenmile Range. Please consider a management prescription such as Backcountry Recreation Non-Motorized for that area. We do support allowing continued mechanized use of the existing trails (i.e, the Wheeler Trail). The existing railroad grade paralleling Highway 91 to Graveline Gulch should also be maintained for trail use purposes, including mechanized uses if determined appropriate by the public.

Regarding the proposed travel management plan, we find that the plan is incomplete in its inventory of trails and needs further work. The travel management plan should be separated out from the Forest Plan, allowing adequate time for more in-depth trail identification and analysis. An increased effort is needed to identify trails and include them in the Forest Service system, where appropriate. We understand that staffing is an issue for the forest service and that it is difficult to add to the list of trails that must be maintained. In light of that, we suggest that the Forest Service allow for other appropriate groups to assist in trail maintenance. For example, Copper Mountain Resort has expressed a willingness to assist in maintenance of a number of trails that access the Copper Mountain area (i.e., Graveline Gulch). There also may be opportunities for the County to assist the Forest Service in the trails inventory work. We also have the following recommendations regarding trail issues:

- Encourage consolidation of trails where multiple trails go to the same location. Bring trails up to forest system standards.
- Seasonal closures and rerouting of trails are appropriate to avoid impacts to environmentally sensitive areas.
- The commission prefers an "open unless signed closed" policy rather than the proposed "closed unless signed open" policy for trails.
- Seasonal closures should be emphasized rather than year-around closures.
- Motorized use should be restricted to designated routes only.
- Foot and horse traffic are lumped together in the plan. We question whether this is appropriate, as allowing horses unrestricted travel could have significant environmental impacts.

A number of Forest Service trails within the Tenmile Basin were identified by the public in the Tenmile Basin Master Planning process as significant. However, several of these trails are accessed across private land, especially in the area of Climax Mine. Examples of these trails include: East Fork of the Eagle Trail, Kokomo Cabin Trail, Carbonate Hill Humbug, and Searle Pass Trail. The Travel Management Plan for Alternative D shows all these trails omitted from analysis due to private access issues. Such omissions assume these trails are exempt from consideration and thus closed to public access. The Tenmile Planning Commission recommends all these trails should remain open for public use, despite public access issues. Instead, the Forest Service should be responsible for working with local governments and private landowners to secure access for Forest Service trails identified as significant in County Master Plans.

Under Alternative D, management prescriptions in the Vail Pass area would preclude winter motorized use but potentially allow summer motorized use. This management strategy is exactly opposite the present situation which allows snowmobiles in certain areas but does not provide for summer use. The existing strategy for multiple uses was developed through an extensive public involvement process. We request that the Forest Service honor the previous recommendations for travel management that were developed by the Vail Pass Task Force.

The area north of I-70 (i.e., Corral Creek area) should be maintained for non-motorized use because of its immediate connection to the Eagles Nest Wilderness.

Finally, there are a number of specific trail areas that we feel need to be maintained for mountain bike use, including the following:

- Ryan Gulch/Salt Lick system of trails to the I-70 overlook

- Lakefront and Buzzsaw trails on the Frisco peninsula
- Commando Run near Vail Pass
- Old Dillon Reservoir area

Roadless Areas

Inventoried roadless areas should receive a management prescription that maintains their existing roadless character. These areas are important to maintain for a number of reasons, including scenic integrity and wildlife habitat.

Ski Area Prescriptions

The planning commission generally supports the proposed extension of the 8.25 Ski-Based Resorts management prescription in the areas proposed by Copper Mountain (i.e, Jacques Ridge and Tucker Creek, approximately 1,400 acres in size). However, the commission also feels that some areas within the current ski permit boundary are not appropriate for the 8.25 prescription. Particularly, we recommend that the Stafford Creek drainage be removed from the 8.25 prescription. This is an environmentally sensitive drainage that provides a critical wildlife movement corridor. In the commission's discussions with Copper Mountain Resort, resort officials responded that they would be agreeable to removing the Stafford Creek drainage from the 8.25 prescription, as they have no plans to develop skiing on the west side of the Stafford/Guller divide. The new prescription for the Stafford Creek area should allow for existing recreational uses to continue.

Nothing in the above recommendation indicates an endorsement of the planning commission for ski area expansion into the areas identified. It is much too early to determine specific impacts associated with any expansion. We do, however, feel that these areas should be identified so that the possibility of expansion into these areas is not precluded.

Aerial Transportation Corridors

The public and the planning commission are very much concerned about maintaining the scenic integrity and existing recreational opportunities on the west side of the Tenmile Range. As such, we do not support the aerial transportation corridor from Copper Mountain over the Tenmile Range to Breckenridge, which appears in several of the alternatives. Possible transportation benefits of such a connection seem inconsequential compared to the potential scenic, environmental, and recreational impacts of the aerial corridor. The west side of the Ten Mile Range is currently an undeveloped, pristine mountain setting, as viewed from Copper Mountain and Hwy 91 (a National Scenic Byway). The west side of the range is also traversed by the Wheeler/Colorado/Continental Divide Trail, a federally designated National Scenic Trail. The existing qualities of these travel corridors should be preserved.

Vegetation Management

There is little disagreement that some of the lodgepole pine forests of Summit County need some type of active management to reduce risk of fire, disease, and to provide more diverse habitat conditions. However, the extent of logging proposed and the "aggressive management" strategy described under Alternative D are alarming and we are not convinced that such a strategy is justified. Based on the most recent revised data provided by the U.S. Forest Service, under Alternative D almost half of the total projected timber harvest on the entire White River National Forest would occur in Summit County in the next ten years. We support a less aggressive approach to timber harvest, emphasizing selective cutting that can clearly be demonstrated to benefit wildlife habitat.

Timber harvest (particularly clear-cutting) can have several significant environmental impacts, such as increased sediment loads in water bodies and increased phosphorous loading. We recommend that as part of mitigation for any proposed timber activities, that the Forest Service be required to monitor all timber activities to ensure that phosphorous loading in streams/lakes does not increase as a result. Phosphorus loading is of particular concern because the State has set strict regulatory standards for phosphorus in Dillon Reservoir and the community has spent millions of dollars on advanced treatment to maintain water quality in Dillon and Green Mountain Reservoirs. We are also concerned about potential wildlife habitat fragmentation associated with road building for timber harvesting activities. Some areas of the Tenmile Basin outside the wilderness currently have a high density of roads. New roads are likely to receive substantial recreational use even if attempts are made to close them. As such, we request that existing roads be utilized for timber management and new roads be avoided.

In addition, clearcuts can have significant visual impacts. These impacts are of major concern because the Summit County economy largely relies on visitor enjoyment of the pristine mountain scenery. Please reconsider the "aggressive management" approach proposed for timber management and instead take a more moderate approach towards vegetation treatments. None of the other five alternatives in the DEIS would involve nearly the amount of harvest in Summit County as proposed under Alternative D, yet it is our understanding that all of the alternatives have been designed to ensure maintenance of a healthy forest.

Intergovernmental Coordination

The proposed Forest Plan lacks discussion regarding coordination of forest activities with local governments and there is no requirement for consideration of local master plans in national forest decisions. We feel that these two issues must be addressed if the Forest Plan and implementing activities are to gain acceptance from the public. Federal law requires that when developing national forest plans, local governments shall be consulted and consideration must be given to locally adopted plans. Federal law specifically requires that the environmental impact statement for a forest plan include:

1) Consideration of the objectives of other Federal, State, and local governments, and Indians tribes, as expressed in their plans and policies.
2) An assessment of the interrelated impacts of these plans and policies
3) A determination of how each Forest Service plan should deal with the impacts identified: and
4) Where conflicts with Forest Service planning are identified, consideration of alternatives for their resolution. (Code of Federal Regulations, Title 16, Part 219.7)

The Draft Environmental Impact Statement for the Forest Plan does not include the above-required analysis. As an example of how locally developed plans have not been considered, we need look no further than the Vail Pass area, where a Forest Service-approved plan was developed. Under Alternative D the entire Vail Pass area in Summit County is designated for Forest Carnivores. The Vail Pass Task Force was formed several years ago to address managing multiple uses of the Vail Pass area, including winter uses such as cross country skiing, snowmobiling, snowshoeing, etc. The Forest Service played a prominent role in these discussions. Although the area may indeed be critical for habitat purposes, the Forest Carnivores designation is potentially in conflict with management plans that were specifically developed for the Vail Pass area after countless hours of community input and public participation. The Forest Carnivores designation may potentially displace some of the existing recreational uses in the area. It is our concern that although we have enjoyed a good working relationship with the local ranger district, decisions made in the Forest Plan will preclude past efforts or hinder future coordination efforts. Therefore, we request that the following policy be added to the objectives listed under Goal 3.4 Public and Organizational Relations, of the Goals and Objectives section of the Forest Plan:

"Objective 3.4d. Cooperatively work with local governments to address issues of common concern and to the maximum extent possible maintain consistency with locally adopted master plans."

Furthermore, we suggest that the Standards and Guidelines section of the Forest Plan include the following to implement the above goal:

Standard: To the maximum extent possible, ensure that national forest management decisions are consistent with locally adopted master plans.

Guideline: Forest service special use permits shall be referred to local government and local planning commissions for comment. Use permits shall not be issued unless the proposed activity maintains consistency with local master plans.

Our commission has also noted that the management prescriptions around urbanized areas such as Frisco and Copper Mountain do not always accurately reflect the interface of uses that occurs in these areas. For that reason, we have looked at the 7.1 Intermix management prescription as a possible tool to use in some of these urban interface areas. Although some of the particulars of 7.1 are too open-ended in terms of the types of uses permitted, we nevertheless support the theme of the Intermix prescription and request that the Forest Service investigate the possibility of utilizing the theme in some of these urbanized locations.

Other Issues

The proposed Forest Plan does not appear to recognize the potential need for a fixed guideway system to address transportation issues. Such a system has been proposed to link mountain communities directly to the Front Range. Forest service officials have indicated that the 8.33 Designated Utility Corridors prescription would be appropriate for such a use. We request that the Forest Service investigate ways to address this issue so as to avoid the necessity of amending the Forest Plan in the future to allow for a fixed guideway.

Finally, we would like to commend the Forest Service on your efforts in developing a new forest plan for the White River National Forest. We know this has been a monumental undertaking. The 1984 plan is outdated and definitely needs to be revised. We support your efforts to accomplish this. Please then take the comments we have provided in the constructive manner in which they are intended. We think that working together with the local communities, we can craft a plan that addresses local needs while preserving the forest for future generations of humans and wildlife.

Sincerely,

Lane Wyatt, Chairman, Ten Mile Planning Commission

Cc: Board of County Commissioners
Lyle Laverty, Regional Forester
Jamie Connell, District Ranger
Senator Wayne Allard
Senator Ben Nighthorse Campbell
Representative Scott McInnis
State Senator Bryan Sullivant
State Representative Glenn Scott

Ten Mile Planning Commission
Steve Hill, Community Development Director
Jim Curnutte, Planning Director
Jocelyn Mills, Town of Frisco
Gary Severson, Northwest Council of Governments

W5980

BOARD OF COUNTY COMMISSIONERS

970-453-2561
fax 970-453-3535

Post Office Box 68
208 East Lincoln Avenue
Breckenridge, Colorado 80424

April 17, 2000

Martha Ketelle
Forest Supervisor
White River National Forest
PO Box 948
Glenwood Springs, CO 81625

Dear Martha,

The Summit County Board of County Commissioners wish to express support for Representative Scott McInnis and his staff in the creation of a consensus alternative to the proposed White River National Forest Plan alternatives. Representative McInnis has worked hard and will present suggestions for an alternative that will represent general interests. The proposed alternative exhibits principals and philosophy we hope to see in the United States Forest Service final plan document.

Thank you,

Gary Lindstrom
Chairman

Bill Wallace
Commissioner

Tom Long
Commissioner

Cc:
Scott McInnis
Summit County Journal
Summit Daily News
Ten Mile Times
Summit Free Press

W6001

Mesa County, Colorado

BOARD OF COUNTY COMMISSIONERS

District 1 - James (Jim) R. Baughman (970) 244-1605
District 2 - Kathryn H. Hall (970) 244-1604
District 3 - Doralyn B. Genova (970) 244-1606

P.O. Box 20,000 • 750 Main Street • Grand Junction, Colorado 81502-5010 • FAX (970) 244-1639

April 18, 2000

Martha Ketelle, Forest Supervisor
White River National Forest
P. O. Box 948
Glenwood Springs, CO 81625

Dear Ms. Ketelle:

The Mesa County Board of County Commissioners supports U.S. Representative Scott McInnis and his staff in creating a consensus alternative to the proposed White River National Forest Plan alternatives.

We feel Representative McInnis has worked diligently and has suggestions for an alternative that will represent general interests. His proposed alternative demonstrates the principals and philosophy we would like to see in the United States Forest Service final plan document.

If you should have any questions or concerns, please feel free to call us. Thank you.

Sincerely,

Doralyn B. Genova, Chair
Board of Commissioners

Kathryn H. Hall
Commissioner

James R. Baughman
Commissioner

cc: Representative Scott McInnis
Daily Sentinel
Bob Jasper, Mesa County Administrator

S:\KC&BL\whiteriver.wpd

W6119

TOWN of FRISCO

P.O. Box 4100 • Frisco, Colorado 80443

April 18, 2000

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Avenue/P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The Town of Frisco is located in Summit County, Colorado. Approximately eighty percent of the land area in Summit County is part of the White River National Forest. The White River National Forest's proposed Land and Resource Management Plan (Forest Plan) is an important component in managing our National Forest amenities.

Summit County government spent many hours and held several public meetings on the proposed Forest Plan. From their analyses and public comments, the County has several comments on improving the Forest Plan. The Town of Frisco endorses Summit County's position on the Forest Plan.

In addition to endorsing Summit County's position, the Town of Frisco has some additional specific comments which are being submitted to the Forest Service under separate cover. Please refer to this letter (also dated April 18, 2000) for additional measures the Town would like to see incorporated into the Forest Plan.

Thank you for considering our cooperative endorsement of Summit County's position on the proposed Forest Plan.

Sincerely,

M. L. Etie
Mayor

(970) 668-5276 • Fax: (970) 668-0677 • Denver Direct: 893-1855 • Email: frisco@colorado.net

W6169

TOWN of FRISCO

P.O. Box 4100 • Frisco, Colorado 80443

April 18, 2000

Martha Ketelle
Forest Supervisor
White River National Forest
900 Grand Avenue/P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

The Town of Frisco is surrounded by the White River National Forest to the south, southeast, west and north. These U.S. Forest Service (Forest Service) lands are important to the town, and provide both aesthetic and recreational amenities to our community. National forest lands also provide a natural and undeveloped buffer between Frisco and other urban areas of Summit County. We do not want anything to jeopardize these areas.

We thank the Forest Service for its work thus far on updating the White River National Forest Plan and applaud your attempt to balance human uses of the forest with biological diversity. While we recognize that Alternative D is a good place to start from, we believe it needs modification. The Town of Frisco would like to submit the following comments for consideration on the White River National Forest's proposed Land and Resource Management Plan (Forest Plan). Please consider these suggestions in drafting the final plan.

On the theme of the Forest Plan:

The Town of Frisco supports a theme which reflects a combination of Alternative D and C, reflecting a balance between human uses and ecological considerations. Wildlife habitats need to be managed to ensure the viability of all populations. Watershed conditions need to be improved and natural processes should be preserved. Timber harvests need to be considered to manage forest health and wildlife habitat. Recreational opportunities need to be managed in a sustainable manner. Opportunities for backcountry huts should be allowed. Opportunities for aerial transportation corridors should be limited.

(970) 668-5276 • Fax: (970) 668-0677 • Denver Direct: 893-1855 • Email: frisco@colorado.net

On Alternative D's Land Management Prescriptions:

1. The Town disagrees with the "Limited Uses" (3.21) prescription that is proposed for the east side of Ten Mile Canyon (west side of the Ten Mile Range). Given this area's current uses, as a non-motorized backcountry area, to introduce motorized uses would potentially change the area's character and create winter safety issues from high avalanche danger. The Town believes it would be better to retain the area's existing management prescription of "Backcountry Recreation – Non-Motorized" (1.31).

2. There are no land management prescriptions which allow for transportation corridors under this alternative. The Town participated in the Highway 9 (Summit Boulevard in Frisco) Environmental Impact Study in 1999. Two areas of National Forest were mentioned in the outcome of the study, as potential areas to accommodate portions of a fixed guideway system. One is the Ophir Mountain area near Highway 9, and the other is a potential underpass near the Loveland Pass area. The Town requests that the "Designated Utility Corridors" (8.32) be added along the transportation corridor areas near Ophir Mountain and Loveland Pass.

3. We feel opportunities for aerial transportation corridors between ski areas should be limited on the WRNF. Within the Ten Mile Basin, a tramway between Breckenridge and Copper Mountain would detract from the scenic quality of the western side of the Ten Mile Range which is currently a pristine, undeveloped natural mountain setting. The Town requests that aerial transportation corridors not be allowed in Summit County.

4. The Town agrees with the USFS's management prescription of "Developed Recreational Complexes" (8.21) for the USFS Peninsula area. This area is a vital recreational area for the Frisco community. In fact, the town is in the process of obtaining a twenty-year special-use permit from the USFS for nordic ski trails on the National Forest's peninsula land. "Developed Recreational Complexes" appears to be the best suited prescription for this area.

   - We also agree with the Forest Service's recommendation to close the Lakefront Trail from Crown Point to the Dickey Fishing Access parking to mechanized uses. Please see additional suggestions on this topic under our travel management comments below.

5. Several prescriptions (primarily under Category 5) allow for timber harvests (including prescribed burns). Timber harvesting and burns have been linked to increases in phosphorus loading in streams and waterways. The Town realizes that the Forest Service's current process to allow for timber harvesting and prescribed burns requires a permit be issued and that this process will continue with the adoption of the Forest Plan. Part of the permit application process includes a NEPA analysis which looks at such issues as phosphorus loading. The Town encourages the Forest Service to continue to analyze phosphorous loading as part of issuing timber harvest and prescribed burn permits.

   We encourage the Forest Service to ensure strict adherence to both Summit County and Forest Service standards for wetlands and water quality for all vegetation management in Summit County.

   - The Town agrees that some of the lodgepole pine forests of Summit County need some type of active management to reduce the risk of disease and to provide more diverse

habitat conditions. However, we are not convinced that the extent of logging that would be allowed under Alternative D is justified. In particular, we are interested in how this policy may affect the Miners Creek area to the south of Frisco. We plan on submitting more in-depth comments on this issue to the Upper Blue Stewardship project and understand that once management of that project is finalized, it will be incorporated into the Forest Plan.

6. In the North Ten Mile Creek area the Town owns a 35 acre parcel which contains the Town's water facility. Our parcel is surrounded to the east and west by the USFS Eagle's Nest Wilderness Area. The National Forest directly to the north of the Town's parcel will be managed under the "Scenic Byways, Areas and Vistas" (4.23) prescription. The Town would like to see this area managed as close to 'wilderness' as possible. It is our understanding that the "Scenic Byways" prescription will do this and therefore, we agree with this area's management prescription.

On the Travel Management Plan:

A) *Closed unless signed open philosophy:* The Town agrees with the Forest Service's new national philosophy of all trails being 'closed unless signed open' as long as adequate funding and a combination of approaches (e.g. new system trails, seasonal and permanent closures, rerouting, etc.) are utilized to create a sustainable Forest-wide trail system.

   We are concerned that without appropriate funding, trails will appear 'closed' due to lack of funds to put up 'open' signs on all open trails. Adequate funding also will help to provide education and enforcement of this new philosophy. Using approaches such as seasonal closures and rerouting will help with trail maintenance/management issues such as eliminating bandit trails from being developed and preventing people from utilizing closed trails without signs (closed signs commonly are taken down today).

B) *The Lakefront Trail on the USFS Peninsula land:* Under both Alternatives D and C the Lakefront Trail between Crown Point and the Dickey Fishing Access area is slated for closure to mechanized uses. We agree with closing this section of the Lakefront Trail to mechanized uses. Elimination of mechanized users on this portion of the trail will help to lessen the rate of erosion into the reservoir.

   Upon allocation of appropriate resources for management of National Forest trails, each trail closed to mechanized uses should be reevaluated to determine if it may be re-opened to mechanized use. The Town supports sufficient funding for National Forest trails maintenance/management, as referenced above in bullet A.

C) *Miner's Creek and Ophir Mountain areas (south of Frisco):* Under both Alternatives D and C, the land management prescriptions are similar for these areas. However, it is very difficult to read and understand the USFS trails map for this area to determine which sections of trails are slated for closure or limited uses. We plan on submitting more in-depth comments on this issue to the Upper Blue Stewardship project and understand that once management issues of trails and trail closures for this project are finalized, they will be incorporated into the Travel Management Plan.

W6169

- On intergovernmental cooperation/communication:

The proposed Forest Plan lacks discussion on the coordination of forest activities with local governments. It is our concern that although we have a good working relationship with the local office, the Dillon Ranger District, decisions made in the Forest Plan may preclude past efforts or hinder future coordination efforts.

During the past several years, Frisco and Summit County have experienced tremendous growth. Given the challenges facing our region with such growth pressures, it is important that jurisdictions work cooperatively and communicate on land use decisions affecting common areas of interest. We endorse the Northwest Colorado Council of Government's January 28, 2000 comment letter to the Forest Service which recommends intergovernmental cooperation between local jurisdictions and the Forest Service. The Town of Frisco recommends a policy be incorporated into the Forest Plan to work cooperatively and communicate with local governments on issues of mutual concern.

- On administration of the plan:

According to the National Forest Management Act, forest plans shall be updated every ten to fifteen years. We are concerned that given the pace of growth in Summit County, any new Forest Plan may become outdated and need revision within the next few years. The proposed Forest Plan has been referred to as a 'plan in motion,' and we recommend the Forest Service ensures the Forest Plan is flexible and dynamic. It needs to be viable as demands on the forest change, and as growth in Summit County continues.

The Town appreciates the Forest Service's efforts to update the White River National Forest Plan. The 1984 plan is outdated and definitely needs revision. These suggestions outline the primary issues Frisco has with the proposed Forest Plan, and are offered as constructive comments for consideration in the final plan. We believe that working together with local governments, a forest plan can be finalized which takes into account local needs while preserving the forest.

Thank you for consideration of our comments.

Sincerely,

M. L. Tex Etie, Mayor

cc: Jamie Connell, District Ranger
Lyle Lafferty, Regional Forester
Gary Severson, NWCCOG
Town of Breckenridge
Town of Dillon
Town of Silverthorne
Summit County Board of County Commissioners

4

W6378

RICHARD F. WYATT
P.O. BOX 337

BOARD OF COUNTY COMMISSIONERS
DENNIS V. BRINKER, Chairman
COUNTY OF JACKSON
WALDEN, COLORADO 80480

NAIDA L. CROWNER
FAX (970) 723-4706
(970) 723-4660

April 14, 2000

Ms. Martha Ketelle, Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

RE: White River Forest Management Plan and Draft Environmental Impact Statement

Dear Ms. Ketelle:

The White River Proposed stated theme of the WRNF Intermix prescription is to, " ...protect natural resources, provide compatible multiple uses, and maintain cooperative relationships between private landowners and other governments with jurisdiction." However, the preferred alternative identified by the WRNF in the Proposed Plan Revision and DEIS identifies zero (0) acres of multi-jurisdictional intermix lands on which to apply intermix prescriptions. Therefore, this Board would ask the WRNF to revisit the intermix issue and work with adjacent landowners and governmental jurisdictions to identify intermix areas of concern. Following the identification of the intermix areas, issues should be identified, goals and objectives developed, multi-jurisdictional management prescriptions developed, and a management implementation and monitoring system implemented for the intermix areas.

The WRNF stated, "Where multiple ownership exists in a watershed of any level, it is important that the Forest work with the appropriate agencies and individuals where necessary to protect the watershed." The WRNF went on to state "Cooperative relationships are emphasized with other agencies and adjacent private landowners." Again, the preferred alternative identified zero acres of intermix lands and there doesn't appear to be a Forest-wide Standards and Guidelines specifically designed to address the Forest-wide Goal of "Cooperate with ...local governments to promote health and sustainability across landscapes."

The entire management plan has a disturbingly regulatory tone related to the "management activities" proposed. There is a difference between proposed regulations and a proposed management plan. The plan generally suggests what the White River National Forest (WRNF) won't do or will deny others an ability to do rather than how it will work with affected parties to remedy existing environmental deficiencies and efforts the WRNF will employ to proactively mitigate potential future impacts associated with future activities.

W6378

The statement *By the end of the plan period acquire instream flow water rights or establish instream flow protection measures in special-use authorizations which protect 10% of all streams.(Water Rights: Objective 1.10)* would indicate that the USFS intends to continue its failed practice of attempting to impose by-pass flow conditions on special use permit renewals. This is very troubling because the Colorado General Assembly in 1994 appropriated and still maintains a legal fund specifically reserved for future litigation should the USFS repeat its failed attempts at imposing by-pass flows on existing facilities. There is no need to continue this destructive and ultimately fruitless practice. It only serves to pit permittees against the USFS and force the expenditure of literally millions of dollars on unproductive litigation.

This concern is also manifested in Aquatic Resources standard #9: "Maintain enough water in perennial streams to sustain existing stream health. Return some water to dewatered perennial streams when needed and feasible (WCP Handbook)." (Page 2-5) And in the description of preferred Alternative D (page 2-10) where the plan summarizes that "a higher priority will be given to physical and biological resources than to human uses of the Forest." This too causes concern for present and future beneficial users of water dependent upon diversions from or across the WRNF. This characterization of the preferred alternative seemingly attempts to justify (but still does not make legal) the USFS's proposal to require by-pass flows. To have the USFS come in at each permit renewal and unilaterally determine how much water it wants now, completely turns Colorado's 100-plus year old system of law on its head. It simply furthers the image of the Federal agencies acting as Big Brother.

This Board would urge the WRNF to rewrite this section to state that the forest will work within Colorado water law and with the Colorado Water Conservation Board to address any identified stream flow requirements.

The Plan should also recognize that pre-FLPMA land use authorizations do exist within the WRNF and that no amendment to the Plan will be necessary for the continued use of facilities with pre-FLPMA land use authorizations so long as such use is consistent with historical practice. Further, the Plan should confirm the USFS's existing policy that a change in the end use of water from a facility that relies on a pre-FLPMA right of way will not be used to trigger amendment of or to justify the termination of pre-FLPMA authorizations.

Under Watershed, the plan asserts "alternatives that propose higher levels of activity for various resources pose greater inherent risks to watershed resources." What is the proper role of mitigation associated with the activities? The risk of non-activity such as curtailing timber harvest or forage management also carries risks to people and the environment which depend on sufficient and reliable water flows from the WRNF.

Is the statement on negligible ("not measurably detectable") water yields (page 3-53) from timber harvests consistent with the history and data from timber harvest and water yield studies at the Fraser Experimental Forest? National Forest were established "principally as a means of enhancing the quantity of water that would be available to the settlers of the arid west." United

W6378

States v. New Mexico, 438 U.S. 696, 713 (1978). Water needs in the stream basins which rise on the WRNF, whether for recreational, municipal, environmental, or other purposes, will clearly increase over the coming decades. It is this Board's opinion that the abandonment of the USFS's historical practice of managing Water Yield as a Forest Management Objective violates the Organic Administration Act, 16 U.S.C. & 475 and should be revised accordingly.

The plan states, "the potential for adverse impacts to water resources from vegetation management activities is proportional to scheduled harvest acres as shown in Table 3-7." This table suggests that risk is only related to increased runoff. However, decreased runoff due to unmanaged increases in vegetation, either through insufficient harvests or over protective fire management, is also a risk for both the environment and humans dependent on adequate runoff from the forests.

Nowhere in the entire Timber Management section of the analysis of alternatives (pages 3-441 through 465) is stream flow variations resulting from varying levels of timber harvest discussed or analyzed. Again, this omission is in abrogation of the USFS's Organic Administration Act. With variations in timber harvest among the alternatives ranging from 4.7 to 18.6 million board feet, significant variations in stream flows can be anticipated. These should be quantified and included in the analysis of alternative timber harvests and in selection criteria employed when choosing a preferred alternative.

The Board of County Commissioners of Jackson County, Colorado thanks you for the consideration of its comments and concerns.

Board of County Commissioners
Jackson County, Colorado

By: _____
Dennis V. Brinker, Chairman

Jackson County Commissioners
P. O. Box 337
Walden, Colorado 80480

DENVER CO 80256
PM
21 APR
2000

Ms. Martha Ketelle, Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

04/25/00 13:10 FAX 970 625 3210 CITY OF RIFLE 001/002

CITY of RIFLE

W6676

202 RAILROAD AVENUE • P.O. BOX 1908 • RIFLE, COLORADO 81650 • (970) 625-2121 • FAX (970) 625-3210

FAX (970) 625-3210

FAX TRANSMITTAL

TO: Forest Service

FROM: City of Rifle

DATE: 4-25

SUBJECT: Resolution 12-00:

NUMBER OF PAGES INCLUDING TRANSMITTAL SHEET: 2

PLEASE CALL Claire AT (970) 625-6237 IF FAX DID NOT TRANSMIT CLEARLY.



04/25/00 13:11 FAX 970 625 3210 CITY OF RIFLE 002/002

W6676

CITY OF RIFLE, COLORADO
RESOLUTION NO. 12
SERIES OF 2000

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIFLE, COLORADO, SHOWING SUPPORT FOR THE DRAFT MODIFIED C ALTERNATIVE PLAN FOR THE WHITERIVER NATIONAL FOREST.

WHEREAS, the City of Rifle is located south and west of the Whiteriver National Forest; and

WHEREAS, the Whiteriver National Forest has been, and for generations to come will continue to be, a place for Rifle residents to recreate; and

WHEREAS, the Whiteriver National Forest is a place where people from across the United States come to hunt, fish, and recreate, bringing tourism to the City of Rifle; and

WHEREAS, any long term change in the use of the Forest is of great interest and has significant impact upon the economic viability of the City; and

WHEREAS, Representative McInnis has undertaken an exhaustive study of various use alternatives and has listened to many voices of the people on the Western Slope of Colorado; and

WHEREAS, Representative McInnis has fashioned a balanced plan which is aimed to continue the health of the forest and the use by wildlife, but will also permit both active use, including limited harvesting of timber and forage for livestock, while preserving wilderness options.

NOW THEREFORE, BE IT RESOLVED THAT the City Council of the City of Rifle, Colorado does hereby endorse the draft modified "C" alternative plan as summarized in the attached two page outline and urges the United States Forest Service to give this plan their greatest attention.

THIS RESOLUTION was read, passed and adopted by the Rifle City Council at a regular meeting held this 19th day of April, 2000.

CITY OF RIFLE, COLORADO

By: _____
Mayor

ATTEST:

_____
City Clerk

CITY OF RIFLE SEAL GARFIELD COUNTY, COLORADO

W6896

TOWN OF MONTEZUMA

5425 MONTEZUMA ROAD
DILLON, COLORADO 80435

April 26, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Please accept these comments on the proposed Revised White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS) on behalf of the Town of Montezuma in Summit County and the Board of Trustees. The Forest Plan is of great interest and concern to us, because the White River National Forest completely surrounds the Town. Our comments focus on the Dillon Ranger District.

We would like to commend the efforts of the Forest Service in undertaking the monumental task of developing a plan for the entire forest.

In our review, however, we have found that all of the alternatives (including D) appear to have both positive and negative aspects. Therefore, Montezuma is not endorsing one alternative, but rather the final forest Plan should reflect the best parts of all the alternatives. Thus, our comments that follow will focus on the approach that makes most sense for Montezuma, regardless of the alternative. We do refer to Alternative D as a point of comparison. We agree with the USFS that human activities should occur in balance with the health of the forest ecosystem.

The recommendations that follow are grouped under major issue headings.

Trails and Recreation

While the Town strongly supports the forest carnivore corridor (5.45) to the west of Montezuma, it appears that high use dispersed recreation designation (4.32) around Town is at odds with the carnivore corridor. Snowmobiles and jeep traffic do not mesh with the adjoining corridor and its purpose.

The Town also opposes the high use recreation (4.32) around the Town due to lack of facilities at the current trail heads. Presently the Sts. John trailhead has no parking and users are parking on private property. The Town has little financial means and therefore, cannot make improvements, purchase port-o-lets or maintain the facilities without the financial support of the county or the USFS. Recreational users are currently using residents' yards as restrooms. If the USFS cannot financially assist the Town to make trailhead improvements, then the area around Town should not be designated high use recreation. If anything, the Town would support reduce motorized recreation around Town, rather than promoting more motorized use.

W6896

Local Coordination

The plan does not fully utilize the Intermix Prescription (7.1). The Forest surrounds Montezuma and the Town is highly impacted by changes in forest use. Therefore, it exemplifies the need for increased cooperation between local governments and the USFS. The USFS should cooperate with local governments to address issues of common concern and recognize local government authority. The Town has spent many hours and precious funding developing a Master Plan and Three Mile Plan that reflect the goals and visions the Town has for it's future. These plans need to be acknowledged and considered heavily when planning forest uses.

Ski Area Management

As you know, the Town of Montezuma is flanked by Keystone Resort to the east and Arapahoe Basin to the north. While we appreciate the resorts and their role in the community, we also feel it is irresponsible to let them grow. Currently, Keystone has 6,000 developable acres in its permit. However, Keystone has only developed 1,850 of those acres. Considering that the resort can still develop 4,000 additional acres before reaching it's permit boundaries, the Town feels strongly that Keystone should not be allowed to expand beyond its current permit boundaries. Skier numbers have not risen as to prove a need for further expansion. We feel that these expansions are wanted for real estate development rather than for public benefit. We applaud Alternative D and it's bold restraints on ski area expansions.

The Town's first goal in it's Master Plan is to protect the small, rural character of the Town. The Town prioritizes the need to preserve it's cultural and historical resources. Expansions into Independence Mountain or Montezuma Bowl would allow the resorts to "close in" on the Town and invite increased large-scale development along the Montezuma Road corridor and in the Town.

Water Issues

The Plan does not recognize the Town's authority to protect it's municipal water supply from the threat of pollution granted under Colorado Revised Statues 31-15-701 (1)(b). The Town is in the process of passing a Watershed Protection District for the Morgan Gulch area. The ordinance prohibits any increase in pollution, timbering, mining, and industrial or commercial operations (this includes ski area operations of any kind). The Town hope the USFS will respect the Town's desire to protect it's water from pollution and request a "zoning " of land in the Morgan Gulch drainage to further protect this precious supply.

Conclusion

We would like to commend the Forest Service for your brave efforts in developing a new plan for the White River National Forest. We appreciate all the public forums and chances for discussion of these important issues.

The Town of Montezuma is a very special place. The Town Board has worked very hard over the last 15 years to keep Montezuma a very special place. This Forest Service plan will have a huge impact on the Town and what it becomes in the future. Without big revenue sources we have a difficult time fighting ski area expansions, development, and degradation of quality of life in this area. We need your help.

W6896

Presently there is a buffer of forest service lands between Montezuma and Keystone Resort. The forest carnivore corridor is part of this buffer and vital to the existence of many species. It is also of utmost importance to non-carnivores. We feel that keeping this corridor open and accessible is vital to the health of the forest and should be one of your primary goals in the plan for this area. The expansion plans of both Keystone Resorts and Arapahoe Basin are at direct odds with the protection of this corridor and the preservation of Montezuma's future as a small Town. We are opposed to the extension of the 8.25 Ski-Based Resorts management prescription in these areas.

We ask that you please consider our local governmental decisions, our Master Plan and our Three Mile Plan and work with us to address issues of common concern. As more trails in the area are closed, the impacts to the area around Montezuma are sure to increase. The high use recreation designation around the Town pits us against problems that we are not equipped to handle properly.

Lastly, we ask that you recognize the Town's desire to protect it's municipal water supply from the threat of pollution. We need your cooperation in helping us protect the lands around Morgan Gulch.

Thank you for taking the time to listen to our concerns.

Best Regards,

Molly Hood
Mayor
Town of Montezuma

cc: Summit County Board of County Commissioners
Gary Severson, Northwest Colorado Council of Governments

W6907

April 26, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P. O. Box 948
Glenwood Springs, CO 81602

Re: Request from CIFGA for a Special Use Authorization (Utility Corridor) as comment on the White River Forest Management Plan

Dear Ms. Ketelle:

The Colorado Intermountain Fixed Guideway Authority (CIFGA) is a special purpose, state planning Authority responsible for testing, demonstrating and planning the deployment of a high-speed monorail within the I-70 corridor. The Authority has identified several planned and/or potential deployments likely to require easements through White River National Forest lands, including:

- an initial segment between Frisco and Silverthorne planned for 2001-2002
- deployment along the I-70 corridor between Denver International Airport and the Eagle County Airport, currently estimated for construction between 2004-2008
- a potential future extension over Cottonwood Pass to connect with transit service between Glenwood Springs and Aspen, Colorado (near Basalt)

CIFGA expects to construct its monorail within the existing I-70 right-of-way to the maximum extent possible, with the sole exception of a departure near the Loveland ski area utilizing a tunnel paralleling the U. S. Highway 6 "Pioneer Bore" (drilled in 1942), and then following the highway back to I-70 at Dillon. Any proposed alignment will be subject to the National Environmental Policy Act of 1969 (NEPA) and the required environmental impact analyses would be conducted in cooperation with CDOT, the Federal Highway Administration and the White River National Forest.

CIFGA therefore requests that the foregoing proposed monorail alignment be accommodated as an approved Designated Utility Corridor usage in the current Draft Environmental Impact Statement (DEIS). CIFGA further requests that table 3-79 in the DEIS be amended to include such a monorail utility corridor. CIFGA looks forward to working with the White River National Forest staff in conducting the environmental studies that will analyze the cumulative impacts of the proposed monorail project. A monorail can serve as an effective, non-motorized system for transporting visitors to recreational areas.

Thank you for your consideration of these requests. If you have questions, please do not hesitate to contact me at (303) 567-2200.

Respectfully,

Miller Hudson
Executive Director

MILLER HUDSON EXECUTIVE DIRECTOR
P.O. BOX 377 • DUMONT, CO 80436 • OFFICE 303-567-2200 EXT. 35 • FAX 303-573-5275 • MHWRITER@AOL.COM

GUNNISON COUNTY, COLORADO

W7661

BOARD OF COUNTY COMMISSIONERS
PHONE: (970) 641-0248
FAX: (970) 641-3061

April 25, 2000

White River National Forest
Supervisor's Office
P.O. Box 948
Glenwood Springs, Colorado 81602

Attn: Dan Hormaechea, Head Planner

Dear Mr. Hormaechea:

The Board of County Commissioners would like to go on record as supporting Alternative D as the preferred alternative for the Proposed Revised Land and Resource Management Plan for the White River National Forest. In supporting this alternative we would like to take this opportunity of pointing out several issues which should be considered in the final EIS.

1) Alternative D on Page O-5 of the Draft EIS, Appendix - Travel Management, West Maroon is listed as (69) - closed to all uses. This also appears on Management Areas Alternative D Map. We understand that this is a mapping error, which will be corrected, and that this trail will remain open.
2) Alternative D on Page O-6 of the Travel Management Book, East Maroon is also listed as (69) - closed to all uses. We understand this is also a mapping error which will be corrected and that this trail will remain open.
3) We support the restrictions on all off-road/off-trail motorized and mechanized travel. The Gunnison County Trails Commission is proposing this same restriction which we support.
4) We urge that the issue of by-pass flows be addressed in a cooperative way that respects State water law and the concerns of existing water right holders.
5) We urge you to consider allowing mountain bicycle use on those non-wilderness trails open to hiking and equestrian use, unless demonstrable specific reasons exist for excluding them on some sections.

We feel the Forest Service is headed in the right direction by giving high priority to the physical and biological resources and to the health of the watersheds. Management to sustain the ecosystem of the forest over time will

COURTHOUSE SQUARE • 200 EAST VIRGINIA • GUNNISON, COLORADO 81230

assure its benefits for human use and enjoyment for generations to come. We support the proposal in Alternative D to place low emphasis on new developments that would unduly encourage increased human uses or recreation, including expansion of ski areas beyond existing permit boundaries.

We appreciate your willingness to come to Gunnison County on two occasions to meet with the public and explain the concepts in the draft EIS. This approach has helped us understand the proposals and make informed comments. We have an abiding concern with its management because part of the White River National Forest - the Marble area - is in Gunnison County, and most of the Forest borders our County.

Please don't hesitate to contact our office if you have any questions regarding this matter.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

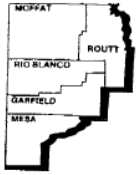
Fred R. Field	Marlene Zanetell	Jim Starr
Chairperson	Commissioner	Commissioner

cc: Marble Town Council

COURTHOUSE SQUARE • 200 EAST VIRGINIA • GUNNISON, COLORADO 81230

05/02/2000 10:17 9706256261 AGNC-RIFLE PAGE 02

W8154



Associated Governments of Northwest Colorado

May 2, 2000

Department of Agriculture
Chief Michael P. Dombeck
Forest Service
4th fl, NW, YATES
Washington DC 20250

RE: Support for Modified C White River Forest Plan

Dear Mr. Dombeck:

This Association representing 5 Counties and 18 Cities in Northwest Colorado supports the Modified C draft planning alternative assembled by Representative Scott McInnis for the new White River forest Plan.

This planning alternative has been unanimously endorsed by our Board of Directors. It represents a balanced approach to resolving the National Resource Issues encompassed by the plan. It protects the Natural Resources while at the same time retaining the basic multiple use guidelines which we believe is essential for an acceptable plan. The so-called "preferred alternative D" swings too far away from the multiple use approach. Alternative D does not provide sufficient recognition that mankind is part of the ecosystem for the use of the forest. Further the Modified C alternative provides important protection for Colorado water rights.

We urge the US Forest Service to adopt the Modified C alternative as proposed by Representative McInnis and his forest planning team. Representative McInnis has done an outstanding job gathering the viewpoints or our counties and communities.

Sincerely,

David Ling
Chairman

cc: White River Forest Service,Glenwood: Martha Ketelle

POST OFFICE BOX 351 RIFLE, COLORADO 81650 TELEPHONE 970-625-1723 FAX 970-625-6261

05/03/2000 10:58 9707250565 PAGE 02/03

W8264

GRAND COUNTY BOARD OF COMMISSIONERS

JAMES L. NEWBERRY
District I, Winter Park 80482
ROBERT F. "BOB" ANDERSON
District II, Granby 80446
DUANE E. DAILEY
District III, Hot Sulphur Springs 80451

PHONE: 970/725-3347
Fax: 970/725-0585
LURLINE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

May 2, 2000

Ms. Martha Katelle
White River Forest Supervisor
P.O. Box 948
Glenwood Springs, CO. 81602

Re: White River Forest Plan

Dear Ms. Katelle:

Thank you for the ability to comment on the above referenced plan. Grand County has two comments regarding this plan. First of all, Grand County is a member of Northwest Colorado Council of Governments, and as such, strongly supports the position that Northwest Colorado Council of Governments has expressed with regard to local collaboration being deficient in all alternatives, and its statement regarding the three components that should be included in all alternatives.

Grand County is also a member of Colorado Counties, Inc. Colorado Counties, Inc., through its Public Lands Steering Committee, has expressed support for Modified Alternative "C". This alternative best expresses conservation and development of our natural resources in a balanced manner. Modified Alternative "C" would accomplish the following:

- Provide a wide variety of summer and winter recreations opportunities from primitive to highly developed, which meet current and future visitor needs. These opportunities include a balance between motorized and non-motorized uses.
- Continues current 752 thousand acres of wilderness including significant opportunities to experience pristine conditions and solitude. Recommends minor additions to existing wilderness areas.
- Maintain populations of all wildlife above minimum viability level. Aggressively manages wildlife habitat to improve the biological diversity necessary for the well being of all wildlife species with special emphasis on threatened and endangered species.

P.O. BOX 264 HOT SULPHUR SPRINGS CO 80451-0264

W8264

- Continues to provide water for National Forest and downstream users. Protects water quality.
- Continues existing range allotments. Retains enough vacant allotments to provide flexibility to respond for forage shortages during drought years and to provide for the expansion for existing livestock operations.
- Provides for timber harvest.
- Provides for collaborative management with local government areas of mixed private and federal land.

In summary, Modified Alternative "C" provides for a multi-use concept of our public lands while retaining wilderness designations.

Again, thank you for the ability to comment.

Sincerely,

Robert F. Anderson,
Chairman

cc: Congressman Scott McInnis
Northwest Colorado Council of Governments
CCI

W8308

RECEIVED
CHIEF'S MAILROOM
2000 MAY -3 AM 9:09

DILLON
COLORADO

April 28, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Please accept the enclosed comments submitted by the Summit County Board of Commissioners as the Town of Dillon's official response to the proposed White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). The comments are representative of the views of the citizens of the Town of Dillon as a whole.

There are two additional points that we would like to see the Forest Service address. First, in reference to the Travel Management Plan, we would like the Forest Service to re-evaluate the permitted uses of the Oro Grande Trail located in the Town of Dillon. The Oro Grande Trail (FDR 65.1 – Tenderfoot Road) under Alternative D is proposed to be closed only to full-sized motor vehicles (Classification 28: closed to full-size motor vehicles, open to ATV's, motorcycles, mechanized vehicles, horseback, and hiking). We request that the proposed permitted uses should reflect to allow no motorized vehicles on this trail for the following reasons: This trail bisects both an identified critical winter habitat range for Elk and a documented, globally imperiled clustered sedge wetland community (the Dillon Bay Fen site). The Town of Dillon is currently creating a management plan to protect the hydrology and habitat of this site.

Second, we would like to obtain a copy of the criteria used to determine "closed" trails under Alternative D. The Town is interested in the information to provide clarification to our citizens.

We recognize that the Forest Service has put forth a great amount of effort in not only compiling the information for the various alternatives, but also in dispensing information to each entity. We especially appreciate the efforts of the staff of the Dillon Ranger District in answering our many questions.

Sincerely,

The Town of Dillon

Town of Dillon
275 Lake Dillon Drive
Post Office Box 8
Dillon, CO 80435

970.468.2403
Fax 970.262.3410

W8308

BOARD OF COUNTY COMMISSIONERS

970-453-2561
fax 970-453-3535

Post Office Box 68
208 East Lincoln Avenue
Breckenridge, Colorado 80424

April 24, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Re: Revised White River National Forest Land and Resource Management Plan and Draft EIS

Dear Ms. Ketelle:

Please accept these comments on the proposed Revised White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). Our comments are representative of the views of the citizens of Summit County as a whole. We have made great efforts, including over 600 hours of staff time and countless hours of time volunteered by community residents, to work with local citizens to develop consensus views on the proposed Forest Plan. The Forest Plan is of great interest and concern to us because over 73 percent of the land in our County is within the White River National Forest. We request that you carefully consider these comments as you develop the final White River National Forest Plan and give special weight to the comments as they reflect the views of our 20,000 residents. We recognize that the different counties in the White River National Forest may at times have very different needs related to management of the national forest. Our comments focus on the needs of the Dillon Ranger District.

We would like to commend the efforts of the Forest Service in undertaking the monumental task of developing a plan for the entire forest. The 1984 Forest Plan is dated and definitely needed to be revised. We would also like to extend our appreciation to Jamie Connell and the employees of the Dillon Ranger District who participated in the numerous public meetings that were held on the Forest Plan in Summit County. Finally, we want you to know that our interest in the Forest Plan goes beyond the current Forest Plan/DEIS review and we would like to extend an offer for our continued participation in working with the Forest Service to develop the final plan.

Since the Forest Plan was first released in August, 1999, a series of public meetings have been held to gather public input on the proposed plan. Each of the four basin planning commissions, the Summit County Open Space Advisory Council, and the Countywide Planning Commission held a minimum of three meetings each for the purpose of discussing the plan and generating public comment. At the meetings a host of issues related to the Forest Plan were discussed. In December, the Board of County Commissioners started a series of public meetings on the Forest Plan also, reviewing the recommendations of the planning commissions. So far, in total the County has held 24 public meetings to specifically address and gather public input on the Forest Plan. This does not count the numerous other meetings held by other groups in the County. Despite divergent interests, consensus has been reached on most issues discussed to date. Therefore, we feel the comments that we are forwarding truly reflect the views of this County's populous. Exhibit C includes attached copies of all the letters that we have received from the public concerning the Forest Plan. Exhibit D includes copies of the recommendations of each of our planning commissions and the Open Space Advisory Council. We anticipate

W8308

that some of the incorporated municipalities (i.e., Breckenridge, Frisco, Silverthorne, Dillon, Blue River, and Montezuma) will send their own comments under separate cover.

As might be expected with any project of this magnitude involving alternatives, there has been a fair amount of criticism aimed at the preferred Alternative D. Numerous groups have spoke out in favor of other alternatives. In our review, however, we have found that all of the alternatives (including D) appear to have both positive and negative aspects. As such, Summit County does not feel that one alternative should be chosen or endorsed, but rather the final Forest Plan should reflect the best parts of all the alternatives. Thus, our comments that follow will focus on the approach that makes most sense for a specific subject area, regardless of the alternative. Our comments will occasionally reference Alternative D because of its status as the preferred alternative. We do feel that a general theme should apply to the final Forest Plan and that theme should be to "walk lightly on the land." In other words, human activities should occur in balance with the health of the forest ecosystem.

The recommendations that follow are grouped under major issue headings such as "Trails and Recreation". The numbering used does not correspond with Forest Service management prescriptions. We have kept these recommendations brief so the focus is on key issues. Please refer to Exhibit A for more detailed background and explanations for each of the numbered recommendations.

Trails and Recreation

1.1 Areas that are currently managed for non-motorized uses should have management prescriptions that maintain their non-motorized character and maintain their existing trail densities.

1.2 The following approach should be taken towards "non-system" trails:
   a. Reroute trails around environmentally sensitive areas (i.e., wetlands, critical habitat areas), or if necessary obliterate trails to avoid environmental impacts.
   b. Increase efforts to identify and improve existing trails for inclusion in the national forest "system".

1.3 The following approach should be taken towards trails recreation:
   a. Maintain important trail connections and trail loop opportunities, and where consistent with ecosystem protection maintain trail densities for both system and non-system trails.
   b. Utilize a combination of trail closures; trail reroutes, seasonal closures, and new trail construction.

1.4 Standardize and improve signage of County trails.

1.5 We endorse the "closed unless designated open" policy with the caveat that the inventory of roads and trails on the Dillon Ranger District is completed and analyzed to ensure trails are not closed simply by omission from the Travel Management Plan.

1.6 The inventory of trails on the National Forest needs to be completed. We recommend that the Forest Service review the detailed inventory of trails provided by the Summit Fat Tire Society to assist in completion of the travel management plan inventory.

1.7 Horse traffic should be separated out from foot traffic in the Travel Management Plan—the two uses have potentially different impacts. Much of the trail damage caused by horse traffic could be avoided if the Forest Service would more closely monitor and control outfitter guide operations. The Summit County Board of County Commissioners recognizes the fact that horse and foot traffic have different levels of impact on forest resources, and questions the proposed policy that horse traffic be permitted freely anywhere off trail. The Board also recognizes that some off trail horse traffic is necessary for hunting purposes. In addition, the Board believes that a significant amount of impact from horse traffic in Summit County results from commercial horse operations using areas repeatedly for day and overnight guided trips. The Board recommends seasonal and permanent closures to horses on trails where significant impacts to physical resources are likely to occur. Secondly, the Forest Service need:

closer monitoring and capacity studies to make decisions on equestrian outfitter guides and their impacts to the National Forest.

1.8 Intergovernmental coordination should be mandatory when addressing trail management issues in areas of interspersed public and private lands.

1.9 The Travel Management Plan should be separated out from the rest of the Forest Plan to allow more time for inventorying and development of final Travel Management Plan recommendations.

1.10 We endorse the closure of trails that are duplicative within a travel system for an area. Specifically, roads and trails that function primarily as connections to the same destination as parallel roads and trails in the nearby vicinity should be closed to improve overall forest health. However, such closures should only apply in instances where the trail in question does not serve a broader recreational function. Specifically, if the road or trail serves to separate uses, offer a loop opportunity, or function as an important connection, other management tools should be considered by the agency before a permanent closure is applied.

1.11 Seasonal closures should be emphasized rather than year-around closures.

1.12 There is a need for adequate trail maintenance and trail enforcement.

1.13 Mixed private and public ownership along trails or current lack of established access should not be used as justification for trail obliteration, as substantial local efforts are underway to secure access and address these conflicts.

1.14 The snowmobile use that is currently allowed under Alternative B for the areas of Vail Pass, the Swan River Basin, and the Miner's Creek area should continue under the new Forest Plan. Summit County is currently working with the Forest Service, other local governments, and local user groups to establish a Winter Travel Management Plan that will hopefully facilitate recreational access to these areas and minimize user conflicts.

1.15 The Forest Service needs better monitoring and enforcement of special use permit conditions to ensure the long term quality of our Forest and permitees should bear responsibility for the impacts they create.

Trails Administrative Issues and Concerns:

In addition to the trails and recreation issues discussed above, Summit County also has a number of specific issues and concerns that we have in our capacity as an acting land manager. These issues and concerns are outlined in Exhibit B. The Forest Plan will have implications on how we manage our current recreational amenities, including the Summit County Recreational Pathway System, County owned trailheads and trails, and future projects, such as the Swan Mountain Bikepath Proposal. Summit County's recreational trail system transcends jurisdictional boundaries. For example, a visitor may typically park at a County owned trailhead, travel on a County trail easement for a mile or two to reach a National Forest Trail or opportunity. Thus, our recommendations aim to achieve seamless management between private, county, and federal lands in order to reduce management problems and create a better recreational system for our residents and guests.

Staff research indicates there are several prescriptions and travel management strategies within the Forest Plan that do not correspond with the County's current recreational management activities in those areas. Exhibit B details these areas and provides recommendations.

Vegetation Management

2.1 Vegetation management should be focused towards improving habitat, biodiversity, and forest health using a less aggressive approach than outlined in Alternative D, emphasizing selective use of vegetation management only in those areas deemed important for these focuses. The goals of stewardship and sustainability should be emphasized rather than short-term goals of habitat improvements for individual species. Timber harvest activities should explicitly demonstrate wildlife benefits, as outlined in the initial scoping recommendations of the Colorado Division of Wildlife.

2.2 The Forest Service should reevaluate and reduce the proposed goals for harvesting in the Blue River basin (i.e., 45% of the total harvest on the White River National Forest under Alternative D) to better reflect current land uses, community goals, and Master Plans. The volume of timber harvest in the first decade should not exceed the much lower volume (i.e., 200 to 300 acres total in the first decade) as suggested in several alternatives in the revised Table 3-7 of the DEIS.

2.3 Timber harvest should be limited to areas with existing roads. Temporary roads should not be created due their potential for long-term use and degradation of natural resources.

2.4 Vegetation Management should not be justified for monetary (budgetary) purposes or to meet timber harvest volume goals in areas designated as wildlife prescriptions.

2.5 Clearcuts should be avoided to the maximum extent because of their environmental impacts and their incompatibility with visual and recreation goals of community Master Plans.

2.6 Forest harvest activities should be compatible with water quality regulations for phosphorous loading in Lake Dillon and should be consistent with County established stream/wetland setbacks. Clearcuts should be avoided to the maximum extent because of their potential to increase sediment and nutrient loading in streams and reservoirs. The Forest Service should require monitoring of all timber activities to ensure that phosphorous and sediment loading in streams/lakes does not increase as a result.

Roadless Areas

3.1 At a minimum, all existing roadless areas should have a management prescription that maintains their roadless character.

3.2 The Acorn Creek and Ute Pass roadless areas should receive a Recommended Wilderness designation.

3.2 The Black Lake West and Black Lake East roadless areas should receive a Recommended Wilderness management prescription. However, the boundaries of the management prescription should be sufficiently set back from the Black Lake access road to ensure that the private landowners in the area maintain the ability to access their property.

3.3 The Vail Pass roadless area should receive a management prescription that recognizes the existing winter motorized use that occurs in the area.

Aerial Transportation Corridors

4.1 The County does not support the location of any aerial transportation corridors as proposed in certain alternatives of the Forest Plan DEIS.

4.3 There needs to be allowances made in the Forest Plan for the potential future location of a fixed guideway system traversing Summit County, potentially from Loveland Pass on the east to Vail Pass on the west. A broad swath should be given a management prescription of 8.32 Designated Utility Corridor—Existing and Potential from the Loveland Pass area to the I-70 corridor, in such a manner that a plan amendment would not be required to allow the exact placement of the fixed guideway system.

4.3 In addition to the above-described fixed guideway corridor, the Forest Service should make other allowances for potential fixed guideways or roadways in the Forest Plan. Examples of these could be new alignments for Hwy 9 from Frisco to Breckenridge, that would potentially cross national forest land near Ophir Mountain. Such future transportation needs should somehow be addressed and accommodated for in the Forest Plan.

Local Coordination

5.1 The Goals/Objectives and Standards/Guidelines sections of the Forest Plan should specifically state that the Forest Service will coordinate planned activities/uses with local government and that the Forest Service in cooperation with local government shall review proposed projects (i.e., special use

permits) to ensure consistency with local master plans. We suggest that language similar to the following be included in the Forest Plan:

Under Goal 3.4 Public and Organizational Relations, of the Goals and Objectives section of the Forest Plan:
"Objective 3.4d. Cooperatively work with local governments to address issues of common concern and to the maximum extent possible maintain consistency with locally adopted master plans."

Under the Standards and Guidelines section of the Forest Plan include the following to implement the above goal:
Standard: To the maximum extent possible, ensure that national forest management decisions are consistent with locally adopted master plans.

Guideline: Forest service special use permits shall be referred to local government and local planning commissions for comment. Use permits shall not be issued unless the proposed activity and related on-site and off-site impacts maintain consistency with local master plans.

5.2 Some consideration needs to be given to use of a management prescription in urban interface areas of the County that more adequately addresses the urban forest management issues that these areas present.

5.3 Summit County Government, the Town of Breckenridge, Continental Divide Land Trust, and the U.S. Forest Service Dillon Ranger District have worked cooperatively over the past fifteen months to develop a backcountry protection strategy for the Golden Horseshoe area, just northeast of Breckenridge. We request that the Forest Service incorporate the March 2000 Golden Horseshoe Backcountry Protection Strategy report by reference in the final Forest Plan so that the management recommendations developed in this collaborative process can be utilized for future federal land resource management, conveyance/acquisition decisions, and permitting decisions in the area. This report has been endorsed by the Summit County Open Space Advisory Council, Breckenridge Open Space Advisory Commission, and Board of Directors for the Continental Divide Land Trust.

Water Issues

6.1 The County strongly objects to the method of achieving the goal of providing sufficient instream flows through extortion in the issuance or renewal of special-use permits which appear to be authorized in the wording of objective 1.1.0. The County encourages the Forest Service to remove the following wording from objective 1.10, "*... or establish instream flow protection measures in special-use authorizations*". Please refer to Exhibit A for more explanation of our objection to this wording.

Ski Area Management Prescriptions

7.1 The Summit County Board of Commissioners feel that some ski areas should be allowed to expand beyond their current permit areas once a clearly articulated and justified need is determined and provided further site-specific analysis determines that such expansions are appropriate. The County cannot determine the appropriateness of any ski area expansions beyond existing permit boundaries without further information. However, a larger amount of discussion received at public meetings centered on this very issue. Please see attached comments of the public in Exhibit C and planning commission comments in Exhibit D. The appropriateness of any actual ski area expansion will need to be determined at a later date when the actual expansion is proposed, a full environmental review pursuant to the National Environmental Policy Act is completed, and the Federal Land Policy Management Act is complied with completely. Efforts currently being pursued by the Northwest Colorado Council of Governments to assess the social and economic impacts relating to activities on lands administered by the Forest Service may help establish thresholds relating to the appropriateness

of ski area expansion. Any proposed ski area expansions should also be reviewed to ensure that the proposal is consistent with locally adopted master plans.

7.2 A variety of potential on-site and off-site impacts can be created by ski area expansion. We request that the Forest Service fully utilize the federal requirements for forest planning and environmental review to ensure that all impacts associated with ski area development are fully identified and addressed in any expansion effort. If the U.S. Forest Service fully utilizes this authority, then it should be unnecessary for the County to create a similar review process to address these issues.

7.3 The Management Area Direction section of the Forest Plan should clearly articulate that 8.25 is the only prescription that allows for developed downhill skiing complexes.

Telecommunications

8.1 The Forest Plan needs to include a discussion of the importance of telecommunications and the plan needs to include provisions to allow for suitable telecommunications sites in various and sometimes remote areas of the national forest.

Vacant Grazing Allotments

9.1 Grazing activities are generally consistent with the rural character of the Lower Blue River Basin of Summit County. We support maintaining the potential for grazing on vacant range allotments north of Silverthorne.

9.2 Vacant grazing allotments in the remaining three basins should be closed to grazing activities. Retaining the potential for open grazing in the upper Ten Mile, Blue River, and Snake River basins is inconsistent with current land uses and may result in cumulative impacts to fragile ecosystems already under heavy pressure from human use.

Finally, we would like to commend the Forest Service on your efforts in developing a new forest plan for the White River National Forest. We know this has been an enormous task. The 1984 plan is outdated and definitely needs to be revised. We support your efforts to accomplish this. Please then take the comments we have provided in the constructive manner in which they are intended. We think that working together with the local communities, we can craft a plan that addresses local needs while preserving the forest for future generations of humans and wildlife.

Sincerely,

Gary M. Lindstrom
Chairman

William C. Wallace
Commissioner

Thomas A. Long
Commissioner

cc: Lyle Laverty, Regional Forester
Jamie Connell, District Ranger
Senator Wayne Allard
Senator Ben Nighthorse Campbell
Representative Scott McInnis
State Senator Bryan Sullivant
State Representative Glenn Scott
Robert Taylor, County Manager
Steve Hill, Community Development Director
Jim Curnutte, Planning Director
Gary Severson, Northwest Colorado Council of Governments

Dear Supervisor Ketelle: In revising the White River National Forest Management Plan, I urge you to:

10214

- **Recommend all 300,000 eligible acres for wilderness protection.**
  Wilderness protects water quality, hunting and other recreation, wildlife habitat, and Colorado's tourism industry.
- **Protect all roadless areas from logging, road-building, development, & motorized recreation.**
  Colorado loses 90,000 acres of open space each year. Once these wild areas are gone, they're gone forever.
- **Close and restore the 500+ miles of unneeded or illegally-created roads and motorized trails**
  Limit snowmobiles to designated routes only.
  Reasonable limits on off-road vehicles and snowmobiles protect hikers, skiers, and wildlife.
- **Decrease logging levels and allow natural processes to occur.**
  Most logging won't help "forest health." Instead, restore fire and other natural processes.
- **Recommend the designation of all potential "wild and scenic" rivers, including Deep Creek.**
- **Prohibit ski area expansions and construction of aerial tramways.**
  Expansions cause sprawl and congestion in mountain towns and destroy wildlife habitat.
- **Support Alternative I, which would protect important wildlife habitat and wildlands.**

In addition, As Mayor of Boulder, I understand how important environmental protection is to our state's future. Please protect the White River.

Signed, Dr. William R. Tucker
Name
Address 3032 10th Street Boulder, CO 80304

W10468

WHITE MAILROOM
2000 MAY -5 AM 8:30

TOWN OF VAIL

75 South Frontage Road
Vail, Colorado 81657
303-479-2100
FAX 303-479-2157

Office of the Mayor

May 5, 2000

Martha Ketelle, Forest Supervisor
White River National Forest
PO Box 948
Glenwood Springs, CO 81602

Re: White River National Forest Plan Revisions

Dear Martha:

The Town of Vail very much appreciates the opportunity to comment on the forest plan and the willingness of U.S. Forest Service staff to answer the many questions that have been raised by Vail citizens, town staff, and Vail Town Council members. At this time, the Vail Town Council would like to transmit the following comments on the proposed revisions to the White River National Forest Plan. Our comments are not specific to any individual plan alternative, but represent the various concerns expressed by Vail citizens at numerous public meetings during our review of the proposed plan revisions.

Aerial Transportation Corridors – The Town of Vail **opposes** any potential aerial transportation corridors between the Vail ski area and the Town of Minturn or the Gilman property. Vail citizens have contributed substantial funding and infrastructure towards the operation of the Vail ski area and we believe the creation of an additional "ski portal" could be severely detrimental to the Town of Vail.

Water Quality / Water Rights – The Town of Vail urges the U.S. Forest Service to study closely the impacts of land and travel management actions on water quality and quantity in the areas within (and adjacent to) the White River National Forest. We recognize the authority of the U.S. Forest Service to regulate bypass flows as part of existing federal permitting processes. However, we believe the U.S. Forest should also recognize the authority of other state, local and regional agencies within Colorado. Therefore, we **support** the North West Colorado Council of Governments Water Quality and Quantity Committee position statement on this issue.

Road and Trail Access – Forest and travel management plan alternatives should be modified to permit mountain bikes to use the same trails as hikers and equestrian trail users. However, mountain bikes should remain excluded from wilderness areas and

1

should not be allowed off-trail. The Town of Vail believes the closure of the following trails to mechanized vehicles under various plan alternatives should be reconsidered due to user demand and potential impacts to tourism/recreation based establishments: FDT 1851.1 (Bowman's Shortcut), Way 2133W.1 (Commando Run), FDR 734.1/734.1A (Red and White Mountain Road), and Way 711W.4 (Mintum to Game Peak), FDR 719.2E (Eiseman Hut Spur), and FDR 751.1B (Fowler-Hilliard Hut). The Town of Vail **supports** the proposed "closed unless designated open" policy for road and trail access.

Singletrack Hiking and Biking Trails on Vail Mountain – The Forest Plan's inventory of travel routes does not include the singletrack trail system on Vail Mountain. The Town of Vail believes written clarification of the status of these trails under each plan alternative is necessary. This should include information on the potential for trail system expansion and special event usage (races, demonstrations, etc.). This trail system is a vital component of Vail's summer tourism amenities. Additionally, trail access within the developed ski area alleviates pressure from trail usage in non-developed forest areas adjacent to Vail.

Compliance with Local Government Plans and the "Intermix" Management Prescription - The Town of Vail urges the U.S. Forest Service to consider the impacts of forest management decisions on adjacent municipalities and counties. Intergovernmental cooperation is critical in managing an area as large as the White River National Forest and input from other agencies should be given due consideration during planning processes. Regional coordination of management activities within the national forest that impact adjacent towns or counties (timber hauling, for example) must be a key priority. The Town of Vail **supports** the North West Colorado Council of Governments position statement on this issue. However, the Town of Vail would **not support** the potential for land swaps between the U.S. Forest Service and private real estate interests. Our position and agreement with the U.S. Forest Service is clearly defined in the Land Ownership Adjustment Agreement.

East Vail's "Forest Carnivore" Management Prescription – The Town of Vail is concerned with how a change in management prescription from "Backcountry Recreation, Non-Motorized" to "Forest Carnivore" under Alternative "D" could impact areas of East Vail. We are not necessarily **opposed** to this new designation, but believe management direction for this prescription is very ambiguous and that future direction should be clarified prior to plan implementation. The Town would like verification on how the new prescription would impact activities (recreation, prescribed burns, etc.) within affected areas. Recreational use of this area (Commando Run, Two Elk Trail, Bowman's Shortcut) has a significant impact on Vail's winter and summer tourism industry via mountain biking, hiking, ice climbing and backcountry skiing opportunities.

Timber Activities – The Town of Vail urges the forest service to consider the impacts of timber activities on recreation and general user experiences within the forest. Timber activities should be restricted to areas previously managed for logging. Timber activities

should be permitted in a manner that is compatible with habitat and recreation management objectives with no new logging roads constructed. We believe sensitive timber activities (non-clear cutting) should be the only type of logging permitted adjacent to Vail.

Ski Area Boundaries – The Town of Vail requests that the U.S. Forest service consider the use of buffer zones within permitted ski area boundaries to stem the growth of "ski in, ski out" real estate development on adjacent private properties.

Permit Fee Collection and Revenue Distribution – The Town of Vail encourages the U.S. Forest Service to consider the redistribution of at least 80% of all revenues collected within White River National Forest back to the White River National Forest. We would also encourage Congress to appropriate sufficient funding for the White River National Forest to manage the forest effectively (including the enforcement of applicable restrictions).

Accessibility – The Town of Vail requests that the U.S. Forest Service provide adequate facilities to physically disabled persons wherever feasible.

Scenic Byways – The Town of Vail **supports** a designation of the "Top of the Rockies" as a (4.23) scenic byway.

Recommended Wilderness – The Town of Vail **supports** a designation of the Dome Peak, Southwest Holy Cross (units 52 & 64), the Flattops (units 5a, 6, 8a & b, 15a), east/south Red Table Mountain (unit 53), Deep Creek (unit 23) and No Name areas as (1.2) Recommended Wilderness.

Special Interest Areas, Minimal Use and Interpretation – The Town of Vail **supports** a designation of Camp Hale and Holy Cross City as (3.1) Special Interest Areas, Minimal Use and Interpretation.

Grazing Allotments – The Town of Vail recommends the U.S. Forest Service maintain all current and vacant grazing allotments open for use by the ranching community.

Vail North of I-70 – Under alternatives "C" and "D", management of forest lands north of Vail (from West Vail east to the Gore Range) would change from "Dispersed Recreation" to "Deer and Elk Winter Range" or "Bighorn Sheep Habitat." The Town of Vail urges the U.S. Forest Service to consider management objectives that balance both biological and recreational needs in these areas. We would expect the opportunity to review and comment on any site-specific management plans or activities for these areas.

Game Creek/Cougar Ridge Area – a change in management direction from "Backcountry Recreation, Non-Motorized" to "Deer and Elk Winter Range" could impact certain uses or activities either seasonally or year-round in this area. The Town of Vail

W10468

supports the use of seasonal closures as a management strategy due to the presence of elk calving areas.

General Habitat Objectives – The Town of Vail encourages the U.S. Forest Service to rely on the expertise of the Colorado Division of Wildlife to ensure the long-term health of the forest ecosystem. We believe the issues of resource depletion and the loss of migration corridors are of substantial importance to the biological well being of the forest.

The Town of Vail would like to acknowledge the U.S. Forest Service Holy Cross District personnel for their exceptional level of assistance and continued cooperation in our evaluation of forest plan alternatives. Thank you for your consideration of our concerns on this issue.

Sincerely,

Ludwig Kurz, Mayor
Town of Vail, Colorado

4

W10469

101 MIDLAND AVENUE • BASALT, CO 81621
(970) 927-4701 • FAX (970) 927-4703

2000 MAY -5 AM 8:47

April 21, 2000

Martha Ketelle
Supervisor, White River National Forest
PO Box 948
Glenwood Springs, CO 81602

Dear Martha:

The Town of Basalt would like to thank you for the opportunity to provide comments on the Draft Forest Plan (the Plan) for the White River National Forest. The protection of our surrounding public forest lands is integral to our Town's goals of maintaining a sustainable community that lives in concert with its natural surroundings. These goals embrace a philosophy of carefully managed growth and protection of the environment, among others. The spectacular character of our landscape and mountains brings visitors to Basalt, year in and year out, while also giving our residents a superior quality of life found few places in the country.

Public lands under the jurisdiction of the United States Forest Service, Bureau of Land Management, and the State of Colorado surround the Town of Basalt. Basalt serves as the entrance to the Frying Pan River Valley and sits at the confluence of the Roaring Fork and Frying Pan Rivers. The natural resource and recreational opportunities available to Basalt, its residents, and visitors are greatly affected by the management of these public lands and waterways.

To this end, we support the overall direction of the preferred Alternative D. Alternative D allows for reasonable expansion of the visitor economy while recognizing that only limited growth is sustainable if we are to preserve our natural heritage. In addition, every level of government is faced with increasing demands for services and constrained spending. It is prudent to constrain growth in roads and developed recreation to expected budget levels.

We also applaud the level of effort that has gone into the planning and public process. All governments struggle to develop adequate public involvement efforts and we recognize the effort which the staff of the White River National Forest has made. We do *not* support the recently proposed comments on the Plan presented by U.S. Congressman Scott McInnis. We believe that the process, which has been fair and open, has resulted in a Preferred Alternative which cares for both the land and serves the people as well.

However, the Town of Basalt also recommends the following amendments to the preferred Alternative D:

Wilderness
The aesthetic, ecological, and recreational values of the wilderness areas that surround us are part of the critical underpinning of our local economy and culture, bringing visitors throughout the year. The mid-valley area is fortunate to have so much surrounding wilderness, offering stunning vistas and opportunities for solitude and adventure. Wilderness entices visitors to the mid-valley area while also providing priceless ecosystem services such as clean air, water, and wildlife habitat.

Established in 1901

W10469

The WRNF still has a generous amount of roadless areas. These areas are critical to preserving sustainable ecosystems in the area, and to meeting the Forest Service's goal of placing a higher priority on physical and biological resources than to human uses of the Forest. Thus, the roadless areas still remaining in the WRNF represent the most important management opportunity on public lands in our region.

Alternative D prescribes an additional 47,000 acres to be designated as Wilderness. This is good news in protecting these pristine, roadless areas. However, we believe that the amount of land designated wilderness should be increased significantly in the Forest Plan to that of Alternative I, almost 300,000 acres.

Basalt Specifics:
Alternative D should adopt a wilderness designation for the Red Table Mountain area and the addition of wilderness to the Hunter Frying Pan Wilderness area as delineated in Alternative I.

We especially recommend designating as much lower elevation Wilderness as possible. The majority of the Wilderness in the WRNF, as well as the Rockies in general, is comprised of high-elevation "rock and ice" landscape. With the amount of growth occurring in the lower elevations, the only undisturbed areas will soon be those areas protected as wilderness. We believe it is important to include for protection ecologically diverse areas that include lower elevation grasslands and mixed forests, to enhance biodiversity in the region. Wilderness is a key aspect of sustaining ecosystems, and thus our very residents, so we support the designation of increased acreage where appropriate.

Timber Harvesting and Forest Protection
We feel that the recommended level of timber harvest in the preferred alternative is excessive for a forest with such high recreational and ecological value – especially for the Town of Basalt which is economically dependent upon the forest's recreational and wildlife assets. Many of the other alternatives contain recommendations for annual timber harvests that are more appropriate for the WRNF. We recommend that the final Forest Plan reduce its prescribed average annual timber harvest from the 8.9 million board feet proposed in Alternative D to 4.8 million board feet proposed in Alternative C.

Basalt Specifics:
We strongly recommend reducing the amount of allowable timber harvest, especially in areas with high recreational components, such as the back of Basalt Mountain, our local recreational treasure.

Forest Carnivores
The 5.45 – Forest Carnivore prescription is a new prescription. In terms of protecting wildlife, this designation may assist in protecting forest carnivores such as the lynx and wolverine. However, we recommend that logging as part of the allowable sale quantity be eliminated from the Standards and Guidelines for this designation to better protect the carnivores from the detrimental effects of timber harvesting, which include roads and use of motorized vehicles. In areas that place a premium upon wildlife, timber harvesting should be done for habitat enhancement alone. Otherwise, under the guise of habitat management, many roadless areas may be logged rather than preserved.

W10469

Travel Management
The preferred alternative goes far in proposing to end off-road travel and limit motorized travel to designated routes. This will greatly support the goal of habitat protection. However, the Plan could go further in closing all roadless areas to motorized travel in both summer and winter. The DEIS documents that non-motorized users (hikers, horseback riders, cross-country skies) far exceed motorized users (snowmobilers, users of off road vehicles) in both winter and summer. One of the biggest conflicts shaping up on the Forest is between non-motorized users in search of solitude and quiet, and motorized users, who are able to penetrate ever further and faster into the Forest due to technological advances. The plan should also reduce motorized uses in semi-private areas, adopting the proposal in plan I. Despite recent accusations that the draft Forest Plan will "close the Forest to recreation", examination of the Plan shows that the preferred alternative still designates thousands of acres for motorized use.

The preferred alternative should reduce the amount of motorized use of semi-primitive areas, adopting prescriptions similar to Alternative I. Motorized recreation in the winter should be limited to designated routes outside of roadless areas that do not disturb wildlife or humans who use the backcountry for non-motorized uses that provide an opportunity for solitude.

Basalt Specifics:
Specific to the Basalt area, we believe the USFS should maintain the Arbaney-Kittle trail as non-motorized for its entire length as it is currently a hiking, biking, and wildlife jewel.

Grazing
The Town of Basalt strongly supports the ranching community in our area. We do not want to be a detriment or burden to the ranching community, nor do we want to promote aspects of a forest plan alternative that do this. We are concerned with the Plan's proposal to remove acreage from grazing allotments. However, we are aware that the preferred Alternative D removes 136,000 acres of primarily vacant grazing allotments from designation - significantly less than that of all other alternatives except Alternative F. We also want to see ranching practices done in an environmentally sound and sustainable fashion.

We propose that vacated grazing allotments should only be closed if there is no demand for them. We also propose that a significant number of allotments should be retained in reserve so that in extremely difficult years there would be some buffering opportunity to allow ranchers to rotate their cattle to these allotments. Another thing that makes ranching difficult is the proliferation of impacts caused by off-road vehicles due to snow compaction. We support managing these impacts.

Wildlife Management Prescriptions
The Forest Service has adopted a direction in which ecological values and wildlife are given precedence over human activities. We support this direction and believe it is necessary in providing long-term sustainable protection of natural resources on the WRNF.

The Forest Service has chosen a strategy that uses "active management to move the Forest in the direction of a diverse and healthy ecosystem condition. Active management includes timber harvesting among other methods. The preferred alternative permits timber harvesting in management prescription areas that total over half of the Forest. Logging that contributes to the Allowable Sale Quantity (ASQ) comprises 834,300 acres, which is over one-third of the Forest. We feel that his is excessive and should be reduced.

W10469

Wild and Scenic Rivers and Research Natural Areas
We commend the Forest Service for proposing rivers designated as wild and/or scenic for continued protection. We urge you to designate all potential Wild and Scenic Rivers, including Deep Creek. We also commend you on designating specific areas as Research Natural Areas. This designation will be valuable in protecting special and unique resources. We urge you to increase the amount of acreage devoted to RNA's.

If you have any questions regarding these comments, please contact our Town Administrator, Tom Baker, at 970-927-4701 x204.

Sincerely,

Rick Stevens, Mayor

4

W10538

The Town of Eagle

Box 609 • Eagle, Colorado 81631
(970) 328-6354 • Fax 328-5203

Meetings:
2nd and 4th Tuesdays

May 1, 2000

United States Forest Service
White River National Forest
Martha J. Ketelle
Forest Supervisor
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

After reviewing the Draft White River National Forest Plan, holding two public meetings, the Town of Eagle would like to offer the following comments:

- In the final forest plan the town would like to endorse the themes of wildlife, biodiversity and dispersed recreation. The town believes these management objectives should be emphasized during the next 15 years of forest uses.

TRAVEL MANAGEMENT

- There needs to be definite dates for the terms Winter and Summer travel, i.e.

  Winter=12/1-4/30 and Summer=5/1-11/30
  Summer Travel--Keep the following roads open to all motor vehicles.
  Seasonal closures to prevent resource damage is justified.

  1) 414.1 The powerline road from the old Adam campground to Gypsum Creek
  2) 431.1 & 431.1L The powerline road from the old Adam campground to the Lime Park area
  3) 514.2 The Red Table Mountain road all the way across the top and down the Red Creek road to the Gypsum Creek road
  4) 632.2 The Grizzly Creek Cow Camp road from the main road to Deep Lake all the way to Grizzly Cow Camp

W10538

Winter Travel-Open the following areas to motorized use
1) Metheny Park, Bumpity Park, Granite Springs, and Big Park. A designated route to these areas may be used, but the open meadow-play areas should be made available.
2) The main Hardscrabble Mountain road from Wolverton Spring over the top of Hardscrabble Mountain to the Gypsum Creek road and to the W. Brush Creek road.
3) Keep a loop route open that allows access from Wolverton Spring to Firebox Park and back to the Hardscrabble Road near the top of Hernage Gulch and then back to Wolverton Spring.
4) Close the areas to the north and west of Adam Mountain. These areas contain deer and elk winter range and are inaccessible to snowmobiles anyway.

- There needs to be a standard that states: motorized access from private roads onto the forest will not be allowed. There is no reason for the USFS to allow exclusive, private motorized access. If motorized administrative access is needed by the FS or a permitee, this can be allowed with restrictive criteria. Presently there is just a guideline and it needs to be changed to a standard.

- Open one of the following two Ways as they parallel each other and change the travel management strategy to a Code 17.
  WAY 464W.2N
  WAY 464W.3

* All the remaining Ways on the Eagle Ranger District, (south side of District), should be permanently and physically closed. These Ways do not go anywhere, and for the most part are very short. If they are left open they will encourage illegal use into areas that are closed.

We would also like to see a continued close working relationship with the local WRNF District office. In the past the town has enjoyed excellent communications and cooperation with this office.

Sincerely,

Roxie Deane, Mayor
Town of Eagle

Cc: Eagle Ranger District

W10542

HEART of the VALLEY
AVON
COLORADO

TO: United States Forest Service

FROM: Avon Town Council

DATE: April 25, 2000

RE: White River Forest Management Plan Comments

Upon Review of the selected alternatives that were provided in the draft Forest Service Management Plan, the Avon Town council cannot support any individual alternative. We do not support Alternative D for several reasons, but primarily because it negates Colorado Water Law.

The Avon Town Council does support a balanced plan similar to the comments of Eagle County and Representatives Scott McInnis. Without having the opportunity to fully evaluate their comments, we can only support them from the balanced approach. Environmental concerns and public access must be addressed together as this process continues.

We believe that inadequate funding of the White River Forest is partially to blame for the existing conditions. We strongly support additional Federal Funding and local volunteer efforts to assist in maintaining our White River Forest.

Post Office Box 975
400 Benchmark Road
Avon, Colorado 81620

970-748-4000
970-949-9139 Fax
970-845-7708 TTY

W10582

RECEIVED
WHITE RIVER FOREST
2000 MAY -5 AM 8: 49

April 28, 2000

Martha Ketelle
Supervisor, White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Martha:

Thank you for allowing Pitkin County to provide comments on the Draft Forest Plan (DFP), Draft Environmental Impact Statement (DEIS), and Travel Management Plan (TMP) for the White River National Forest. Since about 80% of Pitkin County is managed by the federal government, decisions regarding federal land use have a direct impact on the quality of life and economy of our region. Integrating Forest Service, City, and County policies across jurisdictional lines is our only hope to achieve common goals and objectives.

The following comments are based on hundreds of hours of staff and consultant time spent reading the draft documents, meeting with Forest Service staff, attending meetings, and developing recommendations. We applaud the level of effort that has gone into the planning and public process. All governments struggle to develop adequate public involvement efforts and transparent planning processes and we recognize the effort which the staff of the White River National Forest has made. The process, which has been fair and open, has resulted in a Preferred Alternative which "cares for the land and serves the people".

The Pitkin County Board of County Commissioners wish to express their general support for Preferred Alternative (Alternative D) in the DEIS and the proposed TMP (see attached resolution in Appendix 1). Alternative D allows for reasonable expansion of the visitor economy while recognizing that only limited growth is sustainable if we are to preserve our natural heritage. In addition, every level of government is faced with increasing demands for services and constrained spending. It is prudent to constrain growth in roads and developed recreation to expected budget levels.

We have specific concerns with the draft documents, which can be corrected in the Final EIS. Our comments are related to the following areas:

- Prescriptions in selected management areas
  We will point out problems with proposed prescriptions and offer an alternative.
- Proposed wilderness designations
  We will identify areas which should receive additional consideration.
- Socioeconomic impacts
  We will recommend an approach for better assessing and addressing impacts of activities on Forest lands.
- Employee housing
  We will request that a land swap to create affordable housing for Forest Service and local employees be included in the Forest Plan.
- Inholdings
  We will suggest that "inholdings" were not well addressed in the Forest Plan and recommend that federal funds be used to acquire every available inholding in Pitkin county.
- Wildlife- Carnivore Habitat
  We will recommend another approach to meeting carnivore habitat improvements which will not require new roads or clear cutting in every instance.

W10582

We have organized our comments in three sections to match the three primary documents under review- the DFP, DEIS, and TMP. We have focused our comments on Alternative D based on Forest Service comments that the FEIS would focus on a revised Alternative D.

Thank you again for inviting our comments. We have worked closely with the City of Aspen, the Town of Snowmass Village and Aspen Skiing Company and feel that our comments will be consistent and complimentary to their comments. Our staff is prepared to work with Forest Service staff in order to resolve these issues during the preparation of the FEIS. If you have any questions regarding these comments, please contact Ellen Sassano at 970-920-5098.

Sincerely,

Pitkin County Board of County Commissioners

Shelley Roy Harper
Chairperson

Patti Clapper by sdc
Patti Clapper

Dorothea Farris

Mick Ireland by sdc
Mick Ireland

Leslie Lamont

cc: Lyle Laverty, Regional Forester

WHITE RIVER DRAFT FOREST PLAN COMMENTS

The following comments are directed toward the Draft Forest Plan and accompanying Land and Resource Management Plan map. Comments in this section follow a citation from the draft document.

AIR QUALITY (Page 2-3)

Standard: *1. Meet state and federal air quality standards, and comply with local, state and federal air quality regulations and requirements, either through original project design or through mitigation, for such activities as prescribed fire, ski area development or expansion, mining, and oil and gas exploration and production.*

Comment: The Aspen area is listed as a Non-Attainment area from the Clean Air Act. The movement of skiers and other recreation users to and from Forest Service recreation sites exacerbates our PM-10 problems. PM-10 is a proven hazard to the health of area residents and visitors. The City and County spend over $10,000,000 each year on public transportation in an effort to minimize the impact of transportation on air quality. Last year, over 700,000 visitors were moved to and from Forest Service permitted ski areas. In addition, over 80,000 visitors were transported to the Maroon Bells by RFTA bus.

The City and County strongly support the Forest Service direction of constraining future ski area development to currently permitted areas. While the Plan must provide some flexibility for permit adjustments that allow for minor improvements to existing ski areas, new ski areas, particularly those which are not adjacent to downtown areas, will encourage additional automobile travel and pollution. The same concern applies to non-skiing developed recreation. Future recreation activities will need to be accessed by non-motorized means or with transit.

WATER QUALITY (Page 2-5)
9. Maintain enough water in perennial streams to sustain existing stream health. Return some water to dewatered perennial streams when needed and feasible (WCP Handbook).

Comment: As the skiing has evolved from a series of family-owned ski areas to a four-season, recreation and development industry, the reliance on snowmaking has increased exponentially. Visitors are now guaranteed skiing in November regardless of natural conditions. While there are economic benefits to snowmaking, removing water from streams during this low flow season increases danger to flora and fauna in the area.

A policy and implementing Standard for discouraging additional snowmaking based on seasonal stream flows is recommended. Any future expansion of snowmaking would be encouraged to use groundwater or stream flows which have been captured during high stream flow periods. Seasonal flows would be

permitted if other options are not viable or were previously approved. Approvals for any additional snowmaking should incorporate a drainage and erosion control plan to address the added water content to soils.
The City and County are also concerned about possible water quality damage from construction of new roads to service timber cuts.

ADMINISTRATIVE (Page 2-34)

3. Opportunities to convey lands should consider the following:

- *lands in developed areas that have lost or are losing their national forest character*
- *lands within, and immediately adjacent to, expanding communities to assist public and private projects that have the mutual concurrence of federal, state, and local governments*
- *to states, counties, cities, or other federal agencies when disposal will serve a greater public interest*
- *lands that will contribute to community growth, development, and economic prosperity*

Comment: Two of the most critical issues facing our community are affordable housing and transportation. During the last decade and next decade, over $400 million in local, state, and federal funding will be spent in an effort to address these issues. Affordable housing is a national issue which is particularly acute in our community. The average single family home in the Aspen area sells for over $2 million. Like many other resort communities, workers have been priced out of the free market and rely on government-subsidized or deed-restricted housing units to avoid long commutes.

Those who purchase homes in distant communities face long commutes and generate the need for additional highway capacity. Additional traffic exacerbates air quality problems and creates the need for heavily subsidized parking facilities. For that reason, Pitkin County, the City of Aspen, and Town of Snowmass Village agreed in 1995 to limit traffic into Aspen to the level in 1994.

The current Aspen District Forest Service office is an ideal location for a land swap which meets the criteria above. The current site requires visitors who are seeking Forest Service information to drive into the most congested area of Aspen and then return to their desired destination. While less than ideal for an office, the site would be excellent for affordable housing. Conversely, relocation of the Forest offices to the Brush Creek site provides significant air quality benefits and better service to Forest users. The site provides a more direct transit hub to the Snowmass and Maroon Bells areas and the opportunity to significantly upgrade visitor facilities.

Pitkin County and the City of Aspen have approached the Forest Service to propose a land swap to facilitate affordable housing and mitigate transportation issues. Land at the

intersection of Brush Creek Road and Highway 82 would be exchanged for the 7th and Main site. The Brush Creek site would provide improved access for visitors and the potential for Forest Service employee housing. We request that the Forest Plan embrace and recommend this land swap.

FOREST CARNIVORES (Page 3-66)

These areas generally are above 9,000 feet in elevation in the conifer, aspen, and alpine cover types. Most natural processes are allowed to continue; however, vegetation may be intensively managed to enhance habitat characteristics for carnivores. Management activities will provide opportunities for timber harvesting and grazing.

Vegetation may be intensively managed to provide suitable habitat characteristics to assure foraging, denning, and movement capabilities for lynx and wolverine. Lynx habitat characteristics include dense downed logs, which are often found in late-successional forests and used as denning habitats; dense regeneration of conifer forest types, which provide suitable habitat for snowshoe hare used as food by lynx; and forested habitats, which provide secure travelways between denning and foraging habitats. Habitats important for wolverine include high-elevation talus and boulder fields for maternity dens.

Comment: The City and County support the designation of Carnivore Habitat Areas on the forest. We support research on lynx and wolverine habitat. We are however troubled by the single-minded approach that relies on disturbance from timber harvesting to create habitat improvements. Very little scientific data exists regarding the best way to enhance habitat for lynx in Colorado. Our review of the literature suggests that a very cautious and experimental approach is advised. For example, there is sufficient evidence that mature and old growth gap phase, rather than early successional, forests provide the best combination of prey densities and microclimatic conditions for lynx in the southern Rocky Mountains[1] . That stands in opposition to heavy reliance on timber harvesting, including up to 80 acre clear cuts, prescribed in the Forest Plan.

A preferred approach would be to identify habitat areas in the plan with a variety of possible approaches to meeting habitat improvements, including fire. There are clearly areas on the forest which provide the appropriate habitat and which could use fire for disturbance. Other areas would use roadless selective cuts to move into the desired state and smaller clear cuts could be tested in areas with existing roads. During the next Forest Plan revision, measures would be employed to assess the success of each approach. In addition, we anticipate that lynx introduced in the San Juans in 1999 and 2000 will provide us with invaluable information by indicating which habitats they prefer. **We strongly recommend continued research efforts and monitoring to better understand lynx and wolverine habitat before pursuing clear-cutting for habitat reasons. The current proposal is unacceptable and fails to recognize impacts related to roads and loss of forest mosaic.**

[1] See Buskirk, S.W. et al. 1999. Comparative Ecology of Lynx. USDA Forest Service Gen Tech. Rep. RMRS-GTR-30, Chapter 14.

Historically, Pitkin County and the City of Aspen have established policies and provided funding to preserve open space and wildlife habitat. We respectfully request that the Forest Service work in step with us in this effort and involve our County Wildlife Biologist during consideration of habitat improvement measures.

INHOLDINGS

Comment: The Draft Forest Plan fails to identify and address forest inholdings in Pitkin County. Local governments are very concerned that mining claims and land grants could become private resorts in secluded and difficult to serve locations. Pitkin County has exhausted millions of dollars and countless hours trying to resolve conflicts between community desires and private rights related to inholdings and mining claims. The Forest Plan needs to address this critical issue for our future.
Recent land use proposals by Tom Chapman and the proposed Piano Creek Ranch project near Pagosa Springs have made the consequences of inaction clear. Pitkin County struggles to provide the level of services desired by our existing population. Providing services to residents or visitors at remote locations surrounded by forest lands would create great financial risk for our government. The attached article from the *New York Times* describes the issue.

'Undiscovered crisis' -- developers invade wilderness
Tuesday, November 2, 1999
By MICHAEL JANOFSKY
THE NEW YORK TIMES

PAGOSA SPRINGS, Colo. -- Nestled in the San Juan National Forest in southwestern Colorado is a small rectangle of mountains and a valley that straddles the meandering East Fork of the San Juan River.

For now, the rectangle's 2,780 acres are indistinguishable from the surrounding landscape, a dream scene of 1.8 million pristine acres at the Continental Divide,where the only sounds are the water rushing over rocks, the wind and the occasional cry of birds high overhead.

But that is about to change.

Like more than 50 million other acres inside the United States' national parks and forests, only a fraction of the total, the acreage is privately owned. It was one of thousands of land grants made available, in some cases almost 140 years ago, for homesteading, mining and railroads.

Although most of the private tracts remain undeveloped, owners of the rectangle here are planning to build a members-only resort on 200 acres that they call Piano Creek Ranch, where membership shares cost $385,000 to $535,000.

Designed to accommodate 395 families, the resort would include spacious houses, lodges, a golf course and an equestrian center. A ski area would be built on another part of the rectangle. Already, 175 families have signed up, and ground breaking is scheduled for June, with completion planned in two years.

Preservationists say developments like Piano Creek represent only the beginning of a major problem throughout federal lands. It is "the undiscovered crisis," says the National Park Trust, a non-profit group that buys land and donates it to the park system.

"This is one of the results of the booming economy and a lot of new disposable wealth," said Steve Thompson, senior vice president of the Trust for Public Land, another non-profit organization that works to preserve national park lands and forests.

"With population pressures and beautiful places disappearing, people of means are saying, 'I'll get my little corner of Paradise,' and they do what they want with it,"Thompson said. "They have the legal right to do it. But it's sad that resources that are so spectacular, so beautiful would not be made available to a broader audience, only to a limited group."

And with land prices soaring in areas within some of the country's more popular parks and forests, the federal government and non-profit agencies that buy land for preservation may be unable to compete with private investors.

With growing frequency, owners of "inholdings" are developing acreage for commercial gain, setting off intense fights with preservation groups and community organizations concerned that development could damage the ecology.

"It has become a major concern," Interior Secretary Bruce Babbitt said of private development inside federally owned lands. "We need the resources to buy them out before problems start, and there are willing sellers for most of them. But we don't have the money, so the willing seller decides to sell on the open commercial market."

Each year, the major federal land management agencies -- the National Forest Service, the National Park Service, the Bureau of Fish and Wildlife and the Bureau of Land Management -- provide Congress with a list of privately held property they want to buy.

The park service list alone has a backlog of 10,184 private tracts in 145 parks that officials say would cost the government $1.35 billion to buy for preservation. But Congress never appropriates enough money to satisfy all the needs, so which properties are bought depends on the threat of development, the willingness of the owner to sell and the price.

In recent years, Babbitt said, the four agencies have received a combined $300 million to $400 million annually for the acquisition of private land.

In the Denali National Park and Preserve in Alaska, developers are planning to turn an old 20-acre mining site into a remote lodge. For access, which the federal government is required to provide, the developers are asking the park service to improve a 10-mile road through park land that would cross a valley creek 27 times. Park officials fear that the improvement will encourage other land holders to develop sites near the road.

Given the high property values in Pitkin County and the pressures for development, we request that the Forest Service directly address this issue in the Forest Plan. Specifically, we ask the Forest Service to aggressively pursue Land and Water Conservation and other federal funding for purchasing inholdings in Pitkin County. While Pitkin County has enacted local legislation,

known as Rural and Remote zoning, which would minimize opportunities for such development. The Forest Service cannot rely on local policy makers to address this issue indefinitely.

A review of the Forest Map indicates over 50 inholdings exist in Pitkin County - with a majority in wilderness areas. The Standards and Guidelines should reflect a goal of reducing or eliminating all such inholdings during the term of the plan. Furthermore, it is recommended that the timeframe required for Forest approval of land trades be shortened to the extent possible. **Finally, the City of Aspen and Pitkin County would like to develop a partnership with the Forest Service to acquire inholdings jointly where circumstances allow for such a coordinated effort.**

WEED CONTROL

Forest Plan Page 1-10
Objective 3.4c __ Cooperatively work with federal, state, county agencies, and other non government organizations for control of noxious weeds.

DEIS 3-145
Without a concerted and coordinated effort among local, state, federal agencies and private individuals, noxious weed populations can be expected to expand their ranges, threatening ecosystem integrity and function on the Forest.

Comment: Pitkin County has identified noxious weeds as a threat to the natural landscape. Our residents pay a tax to manage weed issues in the county and the County has adopted a comprehensive weed plan to preserve natural vegetation. Adequate Forest Service dollars and staff devoted to weed control on forest lands in Pitkin County is a high priority. The proposed budget for weed control is insufficient to meet the forest plan goals and desired conditions in Alternative D.

The Forest Plan notes that noxious weeds are one of the greatest threats to forest health. Table 3-36 in the DEIS (page 3-146) indicates that Alternative D allows three times the number of acres of land lost to weeds due to timber cutting as other alternatives. This is primarily due to the significant amount of land proposed for Category 5 uses. This calls into doubt the amount of acreage suitable for timber and the amount of land in the Category 5 designations. **The FEIS should reflect greater budget levels for weed control and a mix of category 5 lands that more closely reflects Alternative C or I. If timber cutting is allowed, a full weed mitigation program should be strictly followed, since noxious weeds enter extensively after the native vegetation has been cleared. Pitkin County and the City of Aspen have adopted weed management programs and plans which will be most effective if we work together to prevent infestations. We support and recognize the Forest Service's commendable efforts to use native plants in their revegetation efforts.**

ALTERNATIVE D LAND AND RESOURCE MANAGEMENT PLAN MAP

Comments in this section are based on geographic areas and/or management prescriptions assigned to designated areas.

MAROON TRAILS

Comment: The City and County support Forest Service actions to improve safety and transit accessibility. The Maroon Bells area requires special attention and management given the unique natural features and the intensity of recreation use.

While we agree that the wilderness areas surrounding Maroon Lake require careful monitoring and management, we suggest that the East and West Maroon Creek trails be kept open for public use. A monitoring program could be established which would identify management objectives specific to those areas and circumstances which would trigger future reevaluation of trail usage for possible closure.

This is an area of concentrated use and very high quality hiking. Our concern is that an attempt to prohibit use will lead to more bandit trails and unintended degradation of the environment. **We recommend that the Forest Service consider changing the prescription for these areas from 1.11 Pristine Wilderness to 1.12 Primitive Wilderness.**

OWL CREEK CORRIDOR

Comment: As identified in the Burnt Mountain Final Environmental Impact Statement, this area provides a critical corridor for wildlife movement, is a critical and productive elk calving area, supports numerous Forest Service Region 2 sensitive species, and supports some of the highest biological diversity in the Roaring Fork watershed. The corridor is challenged by development of private lands to the north and developed ski areas to the east and west. **This management area is proposed as 5.43 Elk Habitat in the Draft Plan. We support the wildlife designation in this area.** This prescription would better reflect the management goals and critical nature of this area. It also reflects the role of this area as portal to the wilderness areas to the south. **The spring closure period in this area should be extended from June 20 to June 30 to protect other species, specifically songbirds.**

Pitkin County has taken strides to protect wildlife movement in this area through our land use review process and Pitkin County Wildlife Plan and seeks coordination with the Forest Service to preserve this wildlife corridor for future generations.

AERIAL TRANSPORTATION CORRIDOR

Comment: Last year, almost 800,000 visitors accessed public lands from our local transit system. Most of these trip are moving skiers between Aspen and Snowmass Village and carrying visitors to the Maroon Bells. Moving people between communities and recreation areas in an

environmentally sound manner will continue to be a critical public issue. We expect demand for transit service to continue to expand and the community is considering significant public capital investments to meet those demands.

There has been discussion of linking the Buttermilk Ski Area to Snowmass Village with an aerial transportation corridor. The concept has been discussed for many years and was discussed as a part of the Burnt Mountain Ski Area EIS. Unfortunately, the gondola concept could conflict with the wildlife calving and movement in critical habitat in the Owl Creek corridor. Habitat protection in this corridor is of primary concern to the City and County.

At this time, there is insufficient evidence to accurately assess all of the possible consequences and benefits of a gondola proposal between these recreation centers. We feel that the most appropriate process for considering an aerial transportation proposal in the future would be through a joint review process of Pitkin County, the City of Aspen, the Town of Snowmass Village, and the Forest Service. An aerial transportation project would require amendment of all of our plans. We note that any such study would need to consider the community transportation benefits and impacts of aerial transportation on other forest users, including other recreation users and wildlife. At this time, we support the Forest Service 5.43 designation between Buttermilk and Snowmass.

The County Commission appreciates the recognition of this issue in Alternative D and the creation of a management prescription for possible aerial proposals in the future. The DEIS makes several references to conceptual proposals of aerial transportation in Pitkin County.

On page 3-352, the documents states:

> In 1994 the concept of linking Snowmass and Buttermilk ski areas with a gondola was disclosed as a potential foreseeable action in the Burnt Mountain EIS. In 1997 the idea of linking Aspen Highlands with Buttermilk was disclosed in the Aspen Highlands EIS. The idea of linking the Aspen ski areas by gondola is not a new idea and has been seriously discussed many times by a variety of individuals since the original creation of these resorts, as long ago as the 1950s and 1960s. Key issues driving alternative transportation concepts are lower auto emissions and reduced impacts to air quality; fewer ground transportation circulation and parking impacts; and the opportunity to provide a unique recreation experience. To address the air quality issue, the Aspen Skiing Company presented a preliminary gondola design at a transportation linkages workshop in April 1997. According to the information presented at the workshop, the benefits of such a system are reduced traffic and reduced air pollution problems. If any community exceeds national ambient air quality standards for a particular pollutants twice in one year, it is designated a "non-attainment area." Aspen and a portion of Pitkin County surrounding the city were designated a PM-10 non-attainment area. The primary source of this pollutant is re-entrained dust from street sanding. The Colorado Department of Health has developed a state implementation plan to address this with the primary emphasis of reducing vehicle miles traveled.

On page 3-355, the DEIS states:

> Alternatives B, D, and I. No aerial transportation corridors have been identified. The only transportation corridor that would be considered would be in Pitkin County. A tramway connection between Snowmass and Buttermilk could be analyzed through the Owl Creek area because this area is allocated to the 8.25 management area.

On page 3-358:

> In alternatives B, D, I, no 8.31 areas are located. Any future consideration of aerial tramways to interconnect resorts and communities would require an amendment of the Forest Plan. Most of the impacts to transportation resources would occur outside of NFS lands and likely would include increased traffic congestion.

The quotation from page 3-355 is in error since that corridor is designated 5.43. We suggest correcting this in the FEIS.

It is important to consider aerial transportation proposals in light of future transportation benefits unique to the location. We encourage the Forest Service to consider such proposals on the local merits in collaboration with and support from local governments. Any proposal for such transport in Pitkin County is likely to be exclusively for transportation benefits as distinct from a proposal tied to real estate development. For that reason, we believe the scope of a proposed "transportation-only" amendment to analyze aerial transportation could be limited to local issues which are distinct from other parts of the White River National Forest.

While we do not support driving a "stake through the heart" of aerial transportation, we strongly recommend that such proposals be examined through a Forest Plan amendment with collaboration between local and federal analysis and decision-making processes. It is important to Pitkin County that those analysis and permit processes shall be focused primarily on local environmental and transportation issues.

COAL BASIN

Comment: Pitkin County is very interested in any proposals for developed and motorized uses in Coal Basin. The county has worked toward public investment and remediation in the area. During mining of the area, wildlife was protected and proliferated because general access was very limited. It is recommended that the area be managed to preserve the diverse and healthy habitat which resulted from limited access. The area is now recovering from coal mining activities with active reclamation of roads and revegatation of disturbed areas. It is expected that over the term of this plan, the site will show little sign of human disturbance. Any proposed management prescription for this area should reflect these ongoing efforts.

Based on the difficulties in enforcement for this area, geological makeup of the land, avalanche concerns, lack of adequate developed parking, desires to support wildlife and the natural setting, and the plan's movement toward segregation of uses, we would recommend a 1.31-Backcounty Recreation Non-Motorized designation for this area. Such a designation

would restrict recreation uses to non-motorized users but allow for the possibility of permits for limited recreation uses, such as a snowcat skiing operation.

SKIING

Comment: Skiing continues to play an important role in our regional economy. Maintaining and enhancing skiing facilities on public lands is primarily a private sector activity. However, any such improvements affects land use, transportation, and community viability. **We look forward to a new era of working together with the Forest Service to analyze and require mitigation for impacts of ski area improvements on both public and private lands. The current bifurcated review process does not allow for comprehensive and cumulative review.**

We support the Aspen Skiing Company's request to amend the Forest Plan Burnt Mountain Area permit Boundary to allow an East Burnt Mountain Traverse. We also support the Skico request to include the previously approved trail between Teaser and Jacob's Ladder.

WILDERNESS

Comment: The designated wilderness areas in Pitkin County are cherished for both their cultural and utilitarian values. A majority of the Forest Service land in Pitkin County has been designated Wilderness through cooperation of local government, citizen groups, the Forest Service, and our congressional delegation. We believe that this has benefited both our culture and economy.

The roadless areas that still exist in the White River National Forest represent the most important management opportunity on public lands. These areas hold a key to preserving sustainable ecosystems in our region. While many will disagree on specific scientific and management findings, we can agree that roadless areas in our region are critical to preservation of our natural heritage. Therefore, examination of Roadless areas for Wilderness designation is a critical element of our review of the Draft Forest Plan and Management Area prescriptions.

Visitors are central to the economy of Pitkin County. A recent survey done by the Aspen Chamber Resort Association found that 81% of guests to the area list their number one criteria in choosing a destination resort as "scenery." The value that tourism brings to the community is far more important in economic terms than any extractive industry. The Wilderness areas surrounding Aspen and Snowmass Village provide visitors with incredible vistas and opportunities for experiencing the natural environment while renewing their "mind, body, and spirit". This experience is an aspect of the "Aspen Idea" of human renewal which has guided the development of our resort community. We see the nearby wilderness areas as central to our economy and way of life.

Recent studies have shown the economic benefits of natural landscapes and environmental protection. In the book, Lost Landscapes and Failed Economies: The Search For a Value of Place, Professor Thomas Powers of the University of Montana, documents the volume of data

suggesting that land preservation serves the economic needs of local and federal governments better than extractive uses. A Forest Service paper titled, Economic Well-Being and Environmental Protection in the Pacific Northwest, also concludes that, "a healthy environment is a major stimulus for a healthy economy". Finally, the University of Colorado published the article, A New Look at Old Vistas: The Economic Role of Environmental Quality in Western Public Lands by Ron Raskler which documents the economic value of wilderness areas.

During his announcement of the President's initiative to protect 40 million acres of Roadless Forest Service lands, Secretary of Agriculture Dan Glickman stated:

> *"Public opinion and extensive scientific work have pointed to the ecological and social importance of roadless areas. These areas have unique values that provide Americans with significant benefits such as clean water, wildlife habitat, food for hunters, and recreational opportunities. As part of the national dialogue we are beginning, we need to discuss how to best protect these unique values for our children and our children's children.*
>
> *We also need to discuss the issue of where the agency should invest its limited resources. For example, entering roadless areas is expensive. Timber sales in unroaded areas require environmental impact statements and tend to be very contentious. In fact, many of the lawsuits the Forest Service has faced and lost in recent years involved plaintiffs trying to prevent the Forest Service from building new logging roads into roadless areas.*
>
> *The Forest Service also has a tremendous amount of forest health work to do in roaded areas. For example, the regional science report for the 75 million acre Columbia Basin said that more than 80 percent of existing forest health problems occur in roaded areas. Other roaded areas across the country face similar problems. Indeed, forest managers almost always get a bigger bang for their buck by investing in forest health projects in roaded areas rather than roadless areas.*
>
> *Some have argued that this proposal aims to limit Americans' access to their public lands. Nothing could be further from the truth. In reality, the public is likely to lose more access to the national forests from deterioration of the existing road system than it ever would from a temporary or permanent reduction in new road building in roadless areas. Given budget realities, the Forest Service is having difficulty maintaining its current road system. In fact, since 1990, the American people have lost nearly 10,000 miles of road access due to failed maintenance and deterioration, while the Forest Service has built less than 5300 miles of new road into both roaded and roadless areas."*

Given the Secretary's statements above and the volume of information regarding the social and economic value of preservation, the modest amount of land proposed for Wilderness and the new roads proposed in roadless areas seem counter-indicated. Of the 298,000 acres of roadless areas, only 42% of those lands are proposed for MA 1.2 or Group 1. Given that any other designation is likely to result in roads and/or developed uses, this points out a weakness in the Preferred Alternative.

The Wilderness Act provides direction for identifying and proposing Wilderness areas to Congress. The **Wilderness Act** gives the statutory definition of Wilderness (Section 2(c)):

> *"A Wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain.*
>
> *An area of Wilderness is further defined to mean in this Act an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements of human habitation, which is protected and managed so as to preserve its natural conditions and which:*
>
> *(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;*
> *(2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;*
> *(3) has at least 5,000 acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and*
> *(4) may also contain ecological, geological, or other features of scientific, educational, or historical value."*

Based on the above, we strongly urge the Forest plan to incorporate protection of the remaining roadless areas in Pitkin County. We recommend a twofold approach to providing that protection. First, in addition to the Wilderness areas proposed in Alternative D, we recommend that both the Hunter (75) and North Independent "A" (77) areas be proposed for wilderness. Both areas are natural extensions to the existing Hunter-Fryingpan Wilderness area. While neither of these sites is likely to qualify as pristine wilderness due to proximity to population and current usage, they would be excellent areas for 1.13 Semi-Primitive Wilderness. This would provide an useful edge to the more primitive and pristine areas thereby creating more core area for wildlife, recreation, and ecological renewal.

We also request that the Sloan Peak roadless area be protected from roads. The boundaries of this 19,900 acre area are difficult to clearly identify based on the maps provided but it appears that the area has designations of 1.41, 1.31, 5.4, and 5.41. We support the Core Area and Backcountry Recreation designations which will allow hunters, hikers, and other non-motorized uses. The roadless areas proposed for 5.4 and 5.41 are the most troubling. We ask the Forest Service to consider additional 1.31 or 3.32 Backcountry Recreation designations for those areas. The President's Roadless Initiative may address this issue but Pitkin County and the City of Aspen wish to be on record supporting preservation of this area as roadless.

HUNTER CREEK CARNIVORE HABITAT AREA

Comment: The only areas identified for Carnivore Habitat Management in Pitkin County are the Smuggler Mountain/Lower Hunter Creek Area and the Upper Frying Pan area from Lime

Creek to Hagerman Pass. **The Smuggler area, ranging from approximately 9,000' to approximately 11,000' in elevation and dominated by Engelmann spruce forest, is inappropriate to this prescription.** This is a very popular recreation area that would conflict with the intensive management described in this prescription. In addition, this prescription is intended to "supply…security from intensive recreation and other human uses". It is within two miles of a population base of roughly 5,000 people and 3,300 tourist beds. The Lower Hunter Creek/Smuggler/Warren Lakes area is too heavily utilized for recreation for this purpose. **This area is more suited to a mix of wilderness and recreation designations.**

The Upper Frying Pan region is appropriate given the type of habitat, remoteness, and history of logging activity. While this area is appropriate for the Carnivore habitat prescription, we still do not support use of clear-cuts as a management option at this time based on the data available. We would look forward to working with the Forest Service to identify the most appropriate disturbance approach for this experimental area.

DRAFT TRAVEL MANAGEMENT PLAN COMMENTS

The following comments on the White River National Forest Plan are specifically focused on the Travel Management portion of the plan. Staff met with representatives from the Aspen District and the Sopris District to review specific road and trail use changes and their related impacts as outlined in preferred alternative "D". The comments have been divided into four separate areas, which includes the Winter Travel Management and Summer Travel Management of the two different districts, Aspen and Sopris.

Generally, the approach alternative "D" takes in regard to managing travel on the Forest is in response to technological advances in the way people travel and experience the land. Since the last White River Plan mountain bikes have been developed, the technology behind motorized dirt bikes is allowing riders to more effectively climb difficult terrain. Motorized four wheelers have also become increasingly popular. These three modes of summer travel are allowing people to access more remote sites with increasing regularity than ever before. This travel type, along with the general increase in forest use, has negatively impacted the forest environment. Additionally, conflicts between these modes of travel, hikers and horseback riders are becoming more frequent and with more potential for serious injury.

In the winter, the forest is experiencing a similar phenomenon. The power to weight ratio of new snowmobiles and technological advances in their propelling systems are allowing people to access areas of the forest, which typically remained untouched during the winter months. Given changing technology, it should not be assumed that terrain will limit snowmobile or ATV access to any area. Technology advances, along with a greater number of people, are impacting the environment, as well as disrupting the wilderness experience many come to appreciate.

Alternative "D" attempts to mitigate human travel impacts on the forest resource, while providing areas set aside for certain types of travel in order to avoid excessive human conflicts.

Separating uses will more effectively ensure continued enjoyment of the resource. **The City and County strongly support the policy of considering roads or trails to be considered closed unless posted as open. We also support restricting motorized and mechanized uses to identified roads and trails in order to protect the physical environment and preserve the benefits for future generations. In order for these policies to be implemented, we encourage the Forest Service to increase resources dedicated to education and enforcement.**

In some cases, the perceived changes that Alternative "D" presents, simply reaffirm current misunderstood travel management regulations. Also, Alternative "D" may prohibit winter travel in areas that are not physically accessible because of topographical characteristics. For instance, under the existing plan no single-track trail in the Aspen District can legally be used by motorized means; a rule many currently misunderstand. Additionally, a significant portion of land Alternative "D" closes to snowmobiles is already limited to snowmobile use by its topography.

Overall, the City and County agree with the approach taken in regard to travel management in alternative "D" given population increases, technological advances and related recreational impacts on the Forest. The City and County also support road closures proposed in Pitkin County. We encourage expedited reclamation of those roads and will monitor progress. We propose developing a joint plan for timing reclamation. The plan gives consideration to the wide variety of uses the forest currently experiences. The City and County were impressed with the level of detail in Pitkin County's area of the White River Forest and the following are comments about specific items.

COMMENTS REGARDING OVERALL TRAVEL MANAGEMENT ASPECT

- Enforcement of the plan's regulations will be a continual challenge to the USFS and will be the deciding factor in the success of any White River Forest Plan. **We encourage the Forest Service to focus the human and financial resources necessary to implement and monitor this plan. The budget included in the draft seems insufficient to provide meaningful enforcement.** Given the significance of the change in management, reallocating resources to this task is advised. Without enforcement, there could be numerous unintended consequences to private landowners and an inability to manage public issues and education regarding travel management.

- **Another weakness in the document is a lack of planning and budget for adequate parking facilities at trailheads- particularly for motorized uses.** If motorized uses are concentrated into the planned areas, then developed parking facilities are needed at those sites. the final plan should address location and funding for necessary facilities. Ad hoc parking leads to unsafe travel conditions on county roads and impacts to neighbors.

- **We also note that seasonal closures for wildlife do not appear to be represented in the Travel Management map. Seasonal restrictions should be in place on the following trails: Government Trail (FDT 1980)- 5/15 to 6/20 and 10/30 to 11/30, Tom Blake (FDT 1976)- 4/25 to 6/20 and 10/30 to 11/30, Anaerobic Nightmare (FDT 1980.1)- 4/25 to 6/20 and 10/30 to 11/30. Seasonal closures will also be required in the Owl Creek corridor between Buttermilk and Burnt Mountain.** It would be helpful to have a specific description and designation for these trails on Forest Service maps to increase education and compliance.

- Finally, as recreation demand grows existing developed recreation areas will need to accommodate additional and increased uses. We can expect additional demands for trails and other uses at these sites. **Accommodating a reasonable increase in uses and users on these lands will require increased coordination of Forest Service and City/County planning processes. A joint review process will be imperative to meet the recreation demand while protecting the environment.**

WINTER TRAVEL MANAGEMENT - ASPEN DISTRICT

- **While there is no net increase in area which snowmobiles can access in the Aspen District, there will be an increase in miles of trails snowmobiles can use on Richmond Hill. This is consistent with the Richmond Hill Management Plan group and is an appropriate change based on the lack of snowmobiling opportunities around the Aspen Area.** However, parking problems caused by this possible increase in snowmobile use in the Richmond Hill area has not been adequately addressed by the plan, but it is currently being developed by the Richmond Hill group in cooperation with the USFS and the County.

- **Pitkin County supports the Kobie Park area for snowmobile travel and the attempt to separate conflicting uses.**

- Given wilderness trespass problems up Independence Pass, all snowmobiles will be limited to Lincoln Creek and SH 82. Additionally, Montezuma Basin Road will be closed to snowmobile travel because of the wilderness trespass problem (It is difficult to stay on a road when all land is snow covered). **Snowmobile use in wilderness areas is clearly prohibited and should be. We support these appropriate changes given the trespass problem.** Further, County Rights-of-Way in wilderness areas are legal loopholes for snowmobile travel and the County will consider following the USFS's lead in closing certain County Roads after adoption of a final plan, which travel through designated wilderness areas in an attempt to curtail wilderness trespass. Any closures to USFS roads to snowmobiling will add user volume to county roads in the area.

SUMMER TRAVEL MANAGEMENT – ASPEN DISTRICT

- **Generally, mechanized or motorized travel will only be able to access designated routes.** The routes designated are currently the most utilized trails by these forms of travel and are consistent with the Hunter Creek Task Force recommendations. **This approach is appropriate to minimize maintenance costs and environmental damage.**

- **The current designation, which incorporates the East and West Maroon Creek Trails, should be changed from Pristine to Primitive in order to allow continued maintenance on these popular trails.**

- The USFS should limit all Maroon Creek Valley motorized and mechanized access to Maroon Creek Road rather than along river trails. This would limit impacts by these forms of travel to paved areas.

- **The Hunter Creek Task Force has recommended that Bald Knob Road be opened to vehicular travel up to the wilderness boundary. Vehicular access would be managed through the current County ordinance limiting motorized access in this area to "hunters actively pursuing big game". The City and County endorse this proposal.**

- **Though the trail is drawn across her property, there is no public access to Trail No. 1959.1 through Connie Harvey's property at Johnny Draw (T9S, R86W, Section 33).**

- **There is also no formal public access easement through the Child's ranch (T9S, R86W, Section 31) to Trail No. 1962.1N.**

WINTER TRAVEL - SOPRIS DISTRICT

- **The USFS maps show the lower 1.3 miles of Coal Creek Road as a USFS road. This is clearly a County Road and should be changed on the plan. Additionally, the upper (USFS) portion of the road has been opened to motorized travel. While the appropriateness of this designation is debatable, there has not been a facility developed for parking to support this use at the end of the County Road. A more formal and adequately sized parking facility should be developed as part of this plan if the management is not changed as per our comments.**

- The Hay Park Trail has been designated for motorized access from Prince Creek Road to Capitol Creek Road. The wilderness trespass problems in this area have been extreme, including motorized travel up Mount Sopris. If snowmobiles are allowed to use the Hay Park Trail it is unlikely that they will remain on the trail in the open meadows through which this trail passes. This regulation would be extremely difficult to enforce. **The City and County recommend prohibiting snowmobile access at the Hay Park trailheads based on the extreme nature of the current wilderness trespass violations.**

- A significant change is located in the Upper Frying Pan Valley where motorized access has been eliminated over the area from the Upper Frying Pan through Hagerman Pass. While this closure may be appropriate, it is unlikely the vast majority of snowmobiling activity on top of the pass, which originates in Leadville (where snowmobiling up to the pass is allowed), will comply with closures in the White River National Forest. Changes in Forest Management **Policies will need to implemented on the Leadville side of Hagerman Pass in order to ensure compliance with this closure.**

- The plan designates an area near McClure Pass for X-country skiing (or snowshoeing) given the area's unique pristine characteristics. **This is a great effort to separate asset users and provide a quiet area for non-motorized uses for those seeking tranquility, while maintaining areas like Four-Mile for more active motorized uses.**

- The Eagle-Thomasville Road has been identified as the primary access for snowmobiles. This area, at the end of the County Road, is narrow and expansion for any type of parking is limited by its topography. **The USFS should identify parking alternatives for users of this snowmobile access point in the Forest Plan.**

SUMMER TRAVEL MANAGEMENT – SOPRIS DISTRICT

- The plan does a good job of separating uses around the Thompson Creek and the Four-Mile areas.

- Some trails in the Thompson Creek area end at private lands (private landowners have not yet prohibited public use), rather than continuing on to connect with other public roads or trails. The USFS should pursue acquiring these parcels or securing trail easements in order to ensure continued use of these trails through private lands and allow users to complete popular continuous looped trails in the area.

- The plan does a good job in the Thompson Creek area of utilizing seasonal trail closures for elk calving.

- **Coal Creek Road has been designated for non-motorized use at the end of the County Road (1.3 miles). It would be more appropriate for this designation to begin at Bradrich Creek, a couple miles up from the end of the County Road. This would allow a more significant parking area to be used, rather than the limited parking at the end of the County Road.**

- **The USFS portion of the trail extending from the Arbaney-Kittle Trailhead is identified as open for motorized use. This cooperatively developed trail between the DOW, USFS and Pitkin County was originally identified as a non-motorized hiking, equestrian and biking trail only. The lower portion of the trail begins on County property and enters BLM before finally becoming a USFS trail.** The popularity of this trail for equestrian, hiking and biking uses will not blend well with motorized uses. The safety of both hikers and motorized users will be compromised if this trail is designated for motorized use. **This trail should remain a non-motorized trail for its entire length for safety reasons.**

- **Due to safety concerns relating to conflicts between horseback and bikers, Perham Creek Trail should be designated foot and horseback only.**

Draft Environmental Impact Statement Comments

The following comments are directed toward the DEIS.

SOCIOECONOMIC IMPACTS

Comments: The relationship between impacts from developed recreation on forest lands and development approvals on private lands is ignored in the DEIS. As we have learned about the importance of habitat continuum from public to private lands, we must study and consider the relationship between land use decisions on public and private land. **A lack of analysis regarding these relationships has existed historically and still needs to be addressed in the FEIS.** Forest Service employees, Bev Driver among others, have begun to examine the relationship to Forest Service uses on private lands. through the "Human Dimension" studies.
One of the great learnings of the late 20th century is the evolution of thinking around ecosystem management. We are learning to examine connections and relationships between actions on the landscape. The same lessons need to be learned with regard to the Human Dimension- particularly with regard to the socioeconomic benefits and impacts of developed recreation.

The DEIS fails to satisfactorily address the revision issue of Urbanization. The treatment of this topic would be difficult to justify in the NEPA process. After a significant issue is identified, the process calls for a review of impact by alternative and proposed mitigations or avoidance. **There is no evidence in the document that such an analysis was performed or how the issue was used in selection of the Preferred Alternative.**

In addition, Forest Service regulations require the Line Officer to review and consider local Comprehensive and Master Plans (Title 36, Chapter II, Subpart A, Part 219, Sec. 219.7 (c)) during Forest Planning. While City and County staff have appreciated the level of support and interaction with Forest Service staff, there is no evidence of consideration or review of our planning documents or goals.

Our analysis of the DEIS in relationship to local Comprehensive and Master Plans concludes that only Alternatives D or I could be refined to successfully integrate land use goals between private and public lands. That conclusion is based on meeting wildlife, transportation, environmental protection, quality of life, and economic development goals. Pitkin County and the City of Aspen have made bold strides in protecting natural resources in our region and we look forward to working with the Forest Service to refine the Preferred Alternative into a seamless plan for protecting resources on private and public land.

Unfortunately, the current WRNF position on economic growth can be summed up in the following quote from the DEIS.:

W10582

"Socioeconomic changes in the seven-county planning area are caused by actions initiated by businesses, governments, and other organizations."

This statement is contrary to what we have learned about ecosystem management. The theory is that employment and income tied to private sector development and market expansions will increase rapidly, while employment and income related specifically to FS regulated activities will increase, but more slowly than private sector development. Skiing is the most significant economic engine regulated by the Forest Service. According to the DEIS, skiing accounts for about 94% of the jobs generated by Forest Service regulated activities (31,996 jobs region-wide in 1997). The WRNFS DEIS states that skiing-related economic growth is waning in importance, and other activities occurring on private land like construction of second homes, conferences, and summer festivals are increasing in importance. The document ignores the obvious relationship between permitted uses on the forest and development off the forest.

The DEIS relies on the IMPLAN model to assess socioeconomic impacts. The "input/output" model provides useful but very limited analysis of the symbiotic relationship between forest uses and economic activity.

For example, below is a summary of the WRNF methodology for calculating skiing related jobs:

> Estimated user days and skier day increases for the various alternatives based primarily on past trends.
> Used available data for estimating per user or per skier expenditures.
> Used IMPLAN model to estimate the employment and income implications of the estimated number of users.
> The IMPLAN model was benchmarked with employment, income, and population numbers generated by the demographer's office and confirmed by local governments.

Such an analysis ignores the multiplier effect of economic activity and completely ignores secondary impacts. Below is a critique of methodology:

- Skier expenditure data is based on state averages and does not reflect the continual efforts of the skiing industry in our County to extract more dollars from each customer. **The $184 per day per skier for destination skiers figure used by WRNFS does not reflect the expenditures required to ski and lodge in the Aspen Area. With the average "economy" lodging unit renting for about $240 per night and a day pass for an Aspen Skiing Company mountain at over $60, $184 per day per person would not go far in this valley.**

- **The analysis only considers impacts directly linked to visiting skiers. It does not include "local" skier expenditures**. The lines between locals and visitors becomes increasingly blurred in resort areas where part-time residents are spending more and more time in residence. In fact, Post Construction Residential Workforce Dynamics (Preston, 1999) indicated that the more "local" a part-time resident is, or the greater the occupancy of a part-time residence, the greater their economic contribution. **"Locals" in resort areas increasingly spend money locally that originates from outside of the community**

(dividends, investments etc.), and therefore have the same effect as a tourist on the local economy.

- **A model driven by skier days does not take into account the relationship of ski areas to demand for real estate at or near the base areas.** On mountain improvements most often happen hand-in-hand with base area real estate development as part of the continual upgrade of the skiing environment. Local examples include the concurrent on mountain improvements at Aspen Highlands, the Highlands Village development, the townhomes and condos at the Tiehack base area of Buttermilk, and the upgrading of the Tiehack lift. Real estate developers capitalize on the on-mountain improvements and that ultimately such developments increase real estate values in or near the base area and make the area more attractive for development purposes.

- Admittedly, local governments are ultimately responsible for up-zonings and subdivisions that finally enable such developments, but ski area improvements, by increasing the attractiveness of real estate near the ski area, contribute to the demand for real estate development. **On mountain improvements are regulated both by the forest service and by the County, and so the burden should not be placed on either entity. Rather, the County and the FS should begin analyzing on-mountain improvements at a larger scale. We would welcome discussion of a joint review process which addresses issues comprehensively while working within the regulations which guide each jurisdiction.**

It would benefit the public throughout the region, if the Forest Service would revise it's socioeconomic modeling to address off-site impacts related to on-site activities. Obviously, the relationship between private activities and Forest Service management are inter-related and accountability works both directions. **We need to move beyond finger-pointing and into collaborating on solutions and better analysis. Pitkin County staff would be available to participate in a task force to improve Forest Service modeling for forest planning and review of permits.**

Given the modest proposals for increased development in Alternative D, this problem is minimized. Should additional developed recreation or another Alternative with more developed recreation be considered, our concerns would be much greater.

ACTIVE MANAGEMENT VS. CONSERVATION BIOLOGY

Comments: Few people believe that either approach, active management or conservation biology, hold all of the answers to managing our forests. Each situation calls for decisions based on the best available information at the time. **Given the current direction toward ecosystem management, the roadless initiative, and growing interest in conservation biology, it seems prudent that a plan for the next 15 years would err on the side of conservation biology. While the goals of immediate intervention to support biological resources are important, the consequences of a timber cutting and clear cutting approach will limit future choices for resource managers.**

The Forest Service would be wise to engage the greater community in a dialogue about the role of natural disturbance, specifically fire, in the region. We need to share information regarding the benefits and challenges to using natural disturbance for long term ecological health. This issue is not acute in Pitkin County, but we encourage the Forest Service to consider these comments when considering any possible alterations to the Preferred Alternative or the FEIS. Moreover, **adequate funding must follow adoption of this plan; the management and prescriptions will be completely ineffective if there is not funding and personnel for enforcement.**

AIR QUALITY AND NOISE POLLUTION

Comments: The City of Aspen and Pitkin County have undertaken a number of costly and difficult measures to keep air quality as clean as possible. These include emissions testing in Pitkin County, diesel vehicle standards for contractors, the state's second-largest mass transit system, our extensive network of bike/pedestrian pathways – all in an attempt to keep our air as clean as possible. This effort is hampered by activities that generate large amounts of air pollution.

According to the Forest Service analysis of alternatives, Alternatives D and I most successfully protect overall air quality in the National Forest. This is an important issue for the residents of the City of Aspen and important for the town's economy as well.

We ask Forest Service staff to confirm that the air quality analysis presented adequately assesses the impacts of snowmobiles on air quality. Air pollution emissions from snowmobiles are very high. Levels of particulate, carbon monoxide and hydrocarbon emissions in areas where use is common, are a health concern to people who may be visiting and/or exercising in the area. Primary pollutants of concern from snowmobiles are particulate matter, nitrous oxide, carbon monoxide, and hydrocarbons. A modern snowmobile emits about 225 times the carbon monoxide and 1,000 times the hydrocarbons and nitrous oxides of a modern car.

Two-stroke engines power nearly all snowmobiles. According to the U.S. Environmental Protection Agency (EPA), two-stroke engines dump up to 30 % of their fuel, a mixture of gas and oil, directly into the environment. By contrast, automobiles are driven by four-stroke engines which release 97% fewer emissions than two-strokes. Furthermore, new EPA and CARB regulations have reduced pollution on new automobiles even more, creating an even larger gap between two-stroke snowmobiles and the much cleaner automobiles.

The California Air Resources Board (CARB), using data from the International Snowmobile Manufacturers Association, concluded that one hour on a typical snowmobile produces more pollution than driving a modern car for a year.

Noise is another concern as snowmobile use has grown. The decibel reading (db) at 10 feet from an idling snowmobile (stock machine) is approximately 65 db, and at open throttle

W10582

approximately 90 db. A prolonged (eight hours) noise level at 90 db can cause a loss of hearing and physiological stress.

Pitkin County's and the City of Aspen's noise ordinances restrict noise levels in residential areas to 50 db at night and 55 db in the daytime. There may be some expectation that noise levels in National Forests would be less than levels in residential areas. In any case, **the noise levels in areas where snowmobiles are in use exceed the standards for residential areas in Pitkin County and the City of Aspen, and when a number of snowmobiles are present, would be likely to exceed the levels in the codes even for highway noise.** The noise generated by snowmobiles may not meet the expectations of some users of local ski areas or other backcountry users.

Although we recognize that improvements to snowmobile engines are likely during the scope of the Plan, we strongly support the restrictions the Preferred Alternative places on motorized users and the segregation of snowmobile uses. We believe that such a policy will minimize impacts on public health and other forest users. Any attempt to dilute the motorized policies in the Preferred Alternative in Pitkin County cannot be justified with today's technology and would fail to address the benefits of segregating motorized uses.

FIRE PLAN

Comment: We were unable to find a commitment for funding or completing fire plans in wilderness and other areas where natural disturbance would be utilized. The Forest Service needs to immediately fund and initiate such plans in Pitkin County. We look forward to working with staff on those plans.

25

APPENDIX 1

W10582

RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF PITKIN COUNTY, COLORADO, APPROVING COMMENTS ON THE PROPOSED WHITE RIVER NATIONAL FOREST PLAN, DRAFT ENVIRONMENTAL IMPACT STATEMENT AND TRAVEL MANAGEMENT PLAN
Resolution No. 075 - 2000

RECITALS

1. The United States Forest Service has proposed an updated management plan for the White River National Forest, including a Preferred Alternative (Alternative D), and Pitkin County wishes to comment on these plans during the official comment period.
2. The Pitkin County Board of County Commissioners has conducted public meetings jointly with the City of Aspen and solicited input from as wide a range of forest users as possible and wishes to make joint comments with the City of Aspen, as described in the attached letter.
3. The Board of County Commissioners generally supports the preferred Alternative "D" with modifications to the proposed plan, including improved assessment of on and off-site socioeconomic impacts of activities on Forest lands; better coordination with local governments regarding off-site impacts of forest activities in general; purchase of all private inholdings on Forest lands as quickly as possible; facilitation of a land swap to create affordable housing for local employees and a more centralized visitor center for the Forest; a modified approach to carnivore habitat improvement; support for efforts to separate conflicting uses and support for allowance of reasonable expansion of the visitor economy while recognizing that only limited growth is sustainable if we are to preserve our natural heritage.

NOW THEREFORE BE IT RESOLVED by the Pitkin County Board of County Commissioners that it does hereby approve and adopt the attached letter and comments regarding the proposed White River National Forest Management Plan.

APPROVED ON THE 2ND **DAY OF** MAY **2000**

ATTEST:

Lyndee R. Dean
Clerk to the Board

BOARD OF COUNTY COMMISSIONERS
OF PITKIN COUNTY, COLORADO

Shellie Roy Harper,
Chair

Date: 5/2/00

APPROVED AS TO FORM:

John Ely
County Attorney

APPROVED AS TO CONTENT:

Cindy Houben,
Community Development Director

C:\home\ellens\longrang\usfs\mngmtpln\boccreso.doc

W10815

MEMORANDUM

Town of Frisco ◆ P.O. Box 4100 ◆ Frisco, Colorado 80443

TO: Martha Ketelle, Forest Supervisor

FROM: Jocelyn Mills, Planning Department

RE: Frisco's Comment Letter on the proposed White River National Forest Plan

CC: Clay Brown

DATE: May 1, 2000

On April 18, 2000 the Town of Frisco submitted comments on the proposed White River National Forest Land and Resource Plan. Prior to our submittal, we received several letters from citizens regarding our draft letter. All comments were considered, the Town made some changes, and submitted the final verion to you on the 18th.

We intended to include the citizen letters as attachments to the Town of Frisco's comment letter. I have included these letters with this cover sheet. Since it is still before the comment period deadline, please accept these citizen letters as attachments to the Town of Frisco's comment letter, dated April 18, 2000.

Thank you.

Fax 970-668-0677 ◆ 970-668-5276 ◆ Denver 893-1855

W10815

Lynn Donovan
P.O. Box 1296
Frisco, CO 80443

March 26, 2000

Community Development Department
Town of Frisco
P.O. Box 4100
Frisco, CO 80443

Dear Town Staff and Council-members:

Thank you for giving us the opportunity to comment on your draft letter to the USFS regarding the White River Forest Revision Plan. Thank you, as well, for taking the time to research and draft these comments.

Generally, much of your information I agree with. I do have concerns about your remarks regarding the Frisco Peninsula trails, specifically the Lakefront trail. It is my understanding that the Town still does not have a soft surface trail inventory or master plan. Many of you know that this is something which has been of concern to me since I served on the original Open Space Advisory Council. For a variety of reasons, we left a detailed trails plan unfinished at the time the Open Space Plan was adopted. While I respect that the Town has limited staff, and currently needs to allocate resources to the hard surface trails plan, unfortunately, problems such as this are going to occur since no comprehensive soft surface trails plan exists. Candidly, I find it inappropriate to advocate for trail closures in the absence of such information. Additionally, some of the new road reroutes created to accommodate the campground have created motorized abuse in some areas. Problems such as this in other areas of the Peninsula certainly demand more concern than the Lakefront Trail.

I believe that the reasoning behind closure of the Lakefront Trail is faulty. As a frequent bicyclist and pedestrian on that trail, I have never encountered user conflicts. Generally in Summit County, we are still very fortunate not to have user conflicts. We need to not react to or promote problems which don't exist. The fisherman using the trail are generally concentrated in the first several hundred yards of the shoreline, and use the trail largely to access the lake's sandy beaches. They do not fish from the trail, and I have never encountered a problem passing other pedestrians or bicyclists on the trail.

A 2nd concern mentioned is trail erosion. Again, I feel that this is inaccurate. That trail, more so than many in the County, is hard and sustainable. I know of only a small area experiencing "erosion" which is caused not by trail users but by it's close proximity to the shoreline. A very simple and viable re-route would fix this problem. The Summit Fat

W10815

Tire Society is currently involved in discussions with the USFS to address and resolve this erosion concern. In any event, any concerns related to travel on this trail should address all users. There is no reason to single out user groups. Again, separation of uses does not exist anywhere else in the County. It is a difficult concept to enforce, and should not be promoted where no problems exist.

The Lakefront Trail in particular, and all the Peninsula Trails in general, are an invaluable resource to the Town. Many of the trails fit together to form loops. There are trails on Town owned land that provide connections to USFS trails. The hiking and riding opportunities are second to none. I hope that the Town will soon move forward with a comprehensive trails inventory and plan for the Peninsula involving all user groups, before recommending random trail closure actions.

Sincerely,

Lynn Donovan

W10815



Catherine Ginsburg
PO Box 5027
Frisco, CO 80443

Frisco Town Council
Frisco, CO 80443

VIA Email

RE: Comments to USFS regarding Alternative D

April 3, 2000

I have recently read your comments regarding Alternative D and have some concerns regarding trails issues on the Peninsula and the Lake Front Trail in particular.

I would highly recommend that you reconsider your position on closing the trail to mechanized use. While the Forest Service has recommended that the trail be closed to all user groups because of erosion problems, they have also stated that this erosion could be eliminated with a slight re-alignment of the trail. Thus allowing it to remain open.

I would also suggest that you strike your choice of words regarding user conflict. As a foot user and cyclist who uses this trail frequently, I have not had problems with multi-user conflicts. This is purely conjecture on council's part and comes from no factual evidence whatsoever. In fact, council has chosen to delay inventory of all soft surface trails within the town. With that in mind, I have to question your basis for closing this trail to mechanized use.

Might I suggest that you change the wording in your statement to read as such:

> "While we understand the Forest Service's reason for wanting to close the Lake Front Trail, we would encourage and support re-alignment of the Lake Front and Buzzsaw trails to avoid further erosion impacts to Dillon Reservoir."

Thank you for your consideration.

Sincerely,
Catherine Ginsburg

W10815

SUMMIT FAT TIRE SOCIETY

Community Development Department
Town of Frisco
P.O. Box 4100
Frisco, CO 80443

March 27, 2000

To Whom It May Concern:

Thank you for providing the opportunity to comment on the Town of Frisco draft letter to the USFS regarding the Forest Revision Plan. While the Summit Fat Tire Society generally agrees with both the Forest Plan and the Town's comments on same, we are concerned about the recommendation to close the Peninsula Lakefront Trail to "mechanized" uses.

Singletrack riding opportunities in the Frisco area are somewhat limited. It is our estimate that within a 3 mile range of the town, there are only about 8 to 10 miles of singletrack riding. The Lakefront Trail could arguably be considered the finest trail in the immediate Frisco area. Combined with the "Crown Point to the campground trail," and the extended trail through the frisbee golf course, the Lakefront trail provides a loop opportunity unique to the White River National Forest. Closure of this trail would seriously degrade the mountain biking opportunities in Frisco enjoyed by both locals and visitors.

We take exception to your assertions about both erosion issues and trail user conflicts. We have not seen evidence of either. On numerous occasions, we have discussed closure of this trail with the USFS, and user conflicts have never been mentioned as a concern. In these conversations, the Forest Service has actually recommended closure of this trail to ALL users because of perceived sustainability issues. The Fat Tire Society is currently working with the USFS to resolve these issues. In any event, we feel it is inappropriate and unwarranted to consider closing the trail to mountain bikes only.

Regarding environmental concerns with this trail, it is one of a very few trails in the County which crosses no wet areas. The tread surface is rocky, highly sustainable, and durable. The areas of "erosion" lost to the lake are caused not by trail users, but by wave action from underneath as is evidenced all around Lake Dillon. The few short sections affected by this problem would be very easily rerouted. The Summit Fat Tire Society would like to offer our assistance in this very simple reconstruction of these problem areas. Also, we would, once again, like to offer our assistance to the Town of Frisco in the resolution of any soft surface trail issues.

Sincerely,

JD Donovan, Board Member
Summit Fat Tire Society

Summit Fat Tire Society • Post Office Box 5533 • Breckenridge, CO 80424 • (970) 949-8057

Laura Meeker (D), 10:48 AM 3/30/00 , TOF comment to USFS W10815

From: "Laura Meeker (D)" <LMeeker@Intrawest.com>
To: "'cdd@colorado.net'" <cdd@colorado.net>
Subject: TOF comment to USFS
Date: Thu, 30 Mar 2000 10:48:05 -0800
X-Mailer: Internet Mail Service (5.5.2650.21)

This e-mail to the Town of Frisco states the personal opinions of Laura Meeker and Bruce Dickinson.

As a long term Frisco citizens, we would like to offer the following opinion regarding the TOF letter to the USFS pertaining to the White River National Forest Land Resource and Management Plan.

1. We support your position regarding the east side of Ten Mile Canyon regarding motorized uses and restricting the introduction of motorized uses in this area.

2. Regarding the Penninsula area, we would like to see night skiing available at the Frisco Nordic Center. Furthermore, we would like to see additional nordic ski trails in that area, along with a bigger lodge facility. We support your position regarding the "Developed Recreational Complexes" for the Penninsula. We feel that the Two Below Zero Sleigh ride operation should be moved to another location in order to enhance the skiing opportunities at the Nordic Center.

3. We DO NOT support your position regarding the closure of the Lakefront Trail from Crown Point to the Dickey Fishing Access parking. If this trail is becoming eroded, it is NOT due to mountain bikers. Volunteer trail crews should be directed to this area for trail improvements and ongoing maintenance. Almost certainly the vast majority of trail work volunteers are from the mountain bike segment of trail users. Mechanized use of these trails should be allowed and promoted.

4. We agree with the Town in regard to better specification of logging plans in the Miner's Creek/Bill's Ranch area of Frisco.

5. We further support the town's position regarding a shorter review period of the Forest Management plan.

6. We also support the Forest Service efforts to balance human uses of the forest, but feel that there should be a more widespread education effort on the part of the Forest Service targeted toward Forest Service users, and perhaps even user fees in our area. The solution is not to close trails, but rather to inform users as to the most environmentally sensitive uses of these areas.

Thank you for your consideration of our personal comments.

Sincerely,

Laura Meeker
Bruce Dickinson

Printed for Deanne Aichholz <cdd@colorado.net> 1

John Donovan, 08:43 AM 3/31/00 , Comment letter

W10815

Reply-To: "John Donovan" <letsride@oneimage.com>
From: "John Donovan" <letsride@oneimage.com>
To: <cdd@colorado.net>
Subject: Comment letter to the USFS
Date: Fri, 31 Mar 2000 08:43:32 -0700
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 4.72.3110.1
X-MimeOLE: Produced By Microsoft MimeOLE V4.72.3110.3

To whom it may concern,

I would like to take this opportunity to express my concern with the Town of Frisco's proposal to support the closure of the Lakefront Trail. As evidenced by the fact Frisco supports 5 bike shops that sell and service mt. bikes, I feel it is fairly obvious that mt biking is a very important part of our summertime economy. The Lakefront Trail is an intregal part of a very unique loop along the shore of Lake Dillon and may very well be the finest section of trail in the area. It is among the very first trails to melt out in the spring, drawing people from around the county to Frisco. One of the reasons slated for closure is user conflict. User conflicts typically occur on heavily used trails, not on trails that are as lightly used as Lakefront. I have attended numerous meetings with the USFS, and even on trails that receive many times the volume of traffic (such as Spruce Cr., Ryan Gulch, and Soda Cr.) that Lakefront sees, user conflict has never been mentioned as reason for closure of any trail. You also list erosion as a reason for closure. The few erosion problems along this trail are caused by wave action eroding the banks away,not by people traveling on the trail. While you call for leaving the trail open to fisherman,ironically, scrambling up and down the banks to access the shoreline for fishing is probably the only human activity that is causing deterioration of the banks. I'm also very bothered by the fact that the town has put so little effort into seeking public imput. Summit County has hold more than 20 public meetings and is accepting comments for more than 2 months while Frisco is not holding any public meetings and is accepting comment for only 2 weeks. I find this very disturbing and urge you to extend the comment period, hold at least one public meeting, and notify the residents of this through all means possible. Supporting banning a legal activity on public lands is a very serious issue and deserves much more public imput than the town of Frisco is currently seeking.

Sincerely,
John L. Donovan

Printed for Deanne Aichholz <cdd@colorado.net> 1

W10824

Trout & Raley, P.C.

Attorneys At Law
1775 Sherman Street • Suite 1300
Denver, Colorado 80203
(303) 861-1963 • Fax: (303) 832-4465

May 1, 2000

Ms. Martha Ketelle, Floor Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Re: White River Forest Management Plan and Draft Environmental Impact Statement

Dear Ms. Ketelle:

The Cities of Aurora and Colorado Springs, through the Homestake Project, are the owners and operators of water diversion and storage facilities within the White River National Forest. Hence, they have a direct interest in the White River Forest Management Plan. The Cities will limit their comments to certain key water-related provisions of the proposal and its companion draft EIS.

In general, as expressed in comments submitted on behalf of other Colorado entities, the Cities are concerned that the draft Plan focuses too much upon potential regulatory limitations in the context of fulfilling management duties, as compared to a collaborative process for constructively addressing both environmental and multiple use objectives within the forest. It is only through such a cooperative approach which respects vested interest in general resource objectives, including the provision of a reliable, long-term water supply for domestic uses, that existing and potential problems can be resolved.

In particular, the Cities offer the following more specific observations.

1. Page 1-5, Goal 1.10-water quality. This section states, in part:

Provide instream flows that support the achievement and maintenance in perpetuity of those federal purposes for NF lands (i.e., safe drinking water and

swimming, aquatic life and habitat, recreation and aesthetics, and the natural conveyance of water and sediment) that depend on such flows.

Objective 1.10

By the end of the plan period acquire instream flow water rights or establish instream flow protection measures in special-use authorizations which protect 10% of all perennial streams.

The above provisions are problematic, as they imply that the Forest Service is prepared to utilize its permit authority to obtain water, i.e., bypass flows, outside of the state water adjudication system. Such an approach is inconsistent not only with Colorado water law, but with the McCarran Amendment, 43 U.S.C. § 666, enabling legislation for the Forest, such as the MUSYA, and the Final Report of the Federal Water Rights Task Force as created pursuant to § 389(d)(3) of P.L. 104-127. The above approach would upset the settled expectations of Colorado water users and simply invite future litigation, including possible "takings" claims under the Fifth Amendment.

A more productive approach would be for the Forest Service to work through the Colorado Water Conservation Board (CWCB), utilizing its extensive instream flow program. This state scheme bestows upon the CWCB the exclusive right to appropriate and hold such instream flows for purposes of protecting the "natural environment to a reasonable degree."

The above concerns are equally applicable to Aquatic Resources Standard No. 9 (p. 2-5) and to the description of Preferred Alternative D (p. 2-10), wherein it is indicated that "a higher priority will be given to physical and biological resources than to human uses of the Forests." It should also be noted that since "bypass flows" are not state adjudicated water rights, they will not be administered in priority as such. Therefore, the flows are available for diversion by a downstream junior water right (who is not subject to a permit requirement), and hence may be unavailable to fulfill the purpose(s) intended by the Forest Service.

Water and Aquatic Resources Standard #10 (p. 2-6) indicates that the Forest Service will "manage water-use facilities to prevent gully erosion of slopes and to prevent sediment and bank damage to streams (WCP Handbook)." While appropriate BMPs can and should be employed, the standard should acknowledge that reservoirs must be capable of releasing water at sufficient flow rates to meet downstream river calls and supply legitimate demands. Such releases may also be necessary to protect life and property under certain high flow scenarios.

W10824

As noted by the Colorado Water Congress, the plan should also include a statement indicating that the Forest Service will recognize and protect existing operation and maintenance practices for water facilities, as well as rights of access. The plan should expressly state that pre-existing land use authorizations will be treated in a manner consistent with historical practice.

With specific reference to the DEIS, Part 2, section 2 thereof address "watersheds." It is unclear from this section, exactly how the Forest Service intends to utilize its management plan for purposes of protecting and enhancing the identified environmental values. The section describes the extent of transbasin diversions, including those of Aurora and Colorado Springs (pp. 3-38, 3-39), but says little about why this information is included or how it will be utilized beyond that brief discussion at p. 3-63 regarding the "effects . . . from land use authorization for water use facilities." It does reference, however, "standards for water use facilities to sustain existing stream health" and the "drying up of a downstream reach" through dam operation. This is disconcerting, as there is no mention of either the right of water users to take their water and place it to beneficial use in conformance with state decrees or of the Forest Service's intention to honor those rights. This needs to be corrected.

Further, the Cities are aware of the proposed "Unified Federal Policy" on a watershed approach to water quality protection as recently published in the Federal Register. The Cities incorporate herein the comments of the Colorado Water Congress on that policy. See Attachment A. In particular, management plans should not become the "regulatory" vehicle to disrupt state water allocations in order to promote watershed values.

At p. 3-52 of the DEIS reference is also made to the acquisition or use by the Forest Service of water rights to protect instream flows. This once again raises the specter of either "bypass flows" for permitted activities or federal "instream flow" decrees (non-reserved rights), neither of which is legally appropriate. See also p. 3-51, which speaks of "water rights held by the Forest" to maintain "adequate stream flows for healthy riparian areas and developing recreation sites." What rights are being referenced? Will they be acquired under state law?

In Part 3, section 7 at p. 3-224, it is stated that "flow decreases are the main factor leading to the decline of all four [Colorado River endangered] species." This statement is not based upon any sound scientific analysis and is inconsistent with the recently issued Biological Opinion and accompanying Recovery Agreements. Therefore, it should be deleted.

The Project is also concerned over the "standard" for "water and aquatic resources" found in Chapter 2, on p. 2-5. It calls for the maintenance of a minimum of 70% of potential aquatic habitat capability for streams capable of supporting a self-sustaining fishery. To begin with, the term "potential habitat capability" needs to be further defined in order to fully understand the

W10824

Ms. Martha Ketelle
May 3, 2000
Page 4

potential impact of such criteria. More importantly, however, is the need to recognize that such numeric criteria cannot be applied in the face of the exercise of decreed water rights for diversion and/or storage. It should be noted that numeric criteria of this nature is inconsistent with the Watershed Conservation Practices Handbook (December 1996) which employs more of a "narrative" approach and which evidently reflects a rejection of the more prescriptive numeric formula contained in the July, 1995 draft of this document.

Thank you for your consideration of these comments.

Sincerely,

Mark T. Pifher
for
Trout & Raley, P.C.

Counsel for the Homestake Project

W10903

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 56, Room 1003
P.O. Box 25007 (D-108)
Denver, Colorado 80225-0007

May 5, 2000

ER 99/698

Martha Ketelle, Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, Colorado 81602

Dear Ms. Ketelle:

The Department of the Interior has reviewed the Proposed Revised Land and Resource Management Plan for the White River National Forest and Draft Environmental Impact Statement. The following comments address the various alternatives evaluated in the Plan. We have no comments on the Draft Environmental Impact Statement.

General Comments

The Bureau of Land Management expresses its thanks to the White River National Forest Planning Team for briefing them on the proposed Plan revisions, and advises that no notable management conflicts have been identified between the preferred Alternative D and BLM's management direction set forth in the Glenwood Springs Resource Management Plan. The BLM is continuing to work with the White River National Forest to identify and discuss possible inconsistences between proposed Forest travel designations with existing BLM designations and to address potential shifts in recreational travel and the cumulative impacts to adjacent public lands that may result.

The FWS believes the White River National Forest is proposing bold and forward-thinking steps toward future management of developing and compounding problems on National Forest System lands. The FWS's comments focus on a broad review and on the conceptual direction of and basis for the preferred alternative and other analyzed alternatives. The FWS's comments do not attempt to address the details of implementation associated with the alternatives, but rather their underlying philosophies.

First, we wish to compliment the Forest Service and the White River National Fores[illegible]n the willingness and foresight to recognize and address developing resource and management problems in what clearly would become and has become a sociopolitically charged environment. There is a rapidly growing and diverging demand for static and declining National Forest resources. While there is a very natural desire to retain unfettered access to those resources by all users, recreational and commercial, the continuation of current policy, coupled with a burgeoning

demand for those resources, will certainly lead to an accelerating decline in quantity and quality of those resources. Furthermore, past and present management of our National Forests has caused and continues to cause alterations of the natural pattern and structure of the forest ecosystem. This, in turn, has contributed to a decline in some species and species associations.

The foremost responsibility of the Forest Service must be to manage National Forest System lands in a manner that ensures sustainability of the natural biological and ecological systems of which they are comprised. To do otherwise would not only run counter to the charge of the Forest Service, but also will lead to erosion and loss of the very resources and values to which public and commercial users are demanding full rights of access. The WRNF has recognized these problems and through its proposed Plan revision is seeking to address them in a responsible manner. The Forest Service correctly recognizes that its first responsibility is the maintenance of a healthy and self-sustaining ecosystem. Use and management of forest resources must be compatible with system sustainability. The FWS is in full agreement with and support of the Forest Service on this important concept and the implications of management inherent in this concept.

The FWS has watched and listened with interest to the public discourse over the Forest Service's proposed redirection of WRNF management. A broad theme of opposition is that the WRNF is proposing an unbalanced management approach, favoring wildlife and natural biological systems over human needs and use. That perspective, however, is based on the current status of human use and management of the National Forest System. If, instead, an examination is made of this current state relative to the natural pre-development state of the ecosystem, it quickly becomes apparent that, if anything, the opposite is true. The cumulation of extractive, consumptive, and recreational uses of our forests since settlement, along with the cumulative effects on the forest ecosystem as a result of those uses, is massive. The demands on the National Forest System continue to accelerate, while management of some of those demands has been minimal. While certain extractive uses have declined, overall use and demand continues to increase dramatically.

To FWS, it seems clear that management of National Forest System lands has often been unbalanced to this point, strongly favoring extractive, consumptive, and recreational use of National Forest lands. The natural balance and processes crucial to ecosystem sustainability have suffered. The proposed shift in management direction by the Forest Service is an important step toward reversing a continuing trend that threatens ecosystem sustainability. In FWS's view, the proposed redirection of management philosophy constitutes essential change.

Opponents of the proposed philosophical shift in forest management believe, generally, that management direction should accommodate the increasing demand for recreation and other uses of the WRNF. However, the current level of demand already is resulting in increasingly adverse consequences to the forest ecosystem and the future increase in demand is likely endless. Yet WRNF resources and their ability to absorb human use and consumption is finite. Accommodation of unbridled human demands and maintenance of a sustainable ecosystem are incompatible. Our choices are to continue to accommodate all demands on the National Forests

and gradually destroy them as functioning and productive ecosystems, or to manage use in a manner that maintains ecosystem health, thereby sustaining a constant resource yield. Certainly, FWS believes that management direction must face that reality, managing human demand within the constraints of ecological function and sustainability. The Forest Service is proposing crucial steps in that direction.

Too, it must be recognized that those who favor full protection of National Forest System lands operate on a faulty premise. The full protection philosophy equates protecting the forest with saving the forest. The lifeblood of a natural forest ecosystem is disturbance. Fire, wind, insects, and disease are all natural and critical agents of system renewal and biological diversity. As we have increasingly protected our forests during the twentieth century from both natural and anthropomorphic agents of disturbance, we have unwittingly produced an increasingly mature, less diverse, and less productive ecosystem. This shift has been disadvantageous to numerous species of wildlife. We have in some areas altered the landscape from a diverse mosaic that promotes vegetative and wildlife productivity, diversity, and dynamic stability, to one of reduced productivity and diversity, while simultaneously setting the stage for massive disturbance (fire, insect, and disease) events that will be beyond our control.

Future management direction should, in FWS's opinion, strive to reincorporate to the extent possible those natural disturbance agents as essential and beneficial processes in a naturally functioning and healthy ecosystem. That will require a shift from a philosophy that too often treats such agents as a symptom of or a path to an unhealthy condition. At the same time, expanding human development in the forest environment makes a complete return to natural disturbance and recycling processes impossible. Fire, disease, and insect outbreaks will always require a certain level of control in and near human development for reasons of safety, property value, and aesthetics. Consequently, a combination of active management and natural processes will be necessary to regain and maintain some semblance of natural pattern and process.

The Alternatives

Management of Forest Vegetation Pattern and Structure

In order to begin the process of restoring natural patterns and process to the WRNF, gaining management control of human use of forest resources, and stabilizing or reversing negative trends for wildlife, FWS endorses concepts embodied in Alternatives D and I.

The FWS agrees with the fundamental ecological assumptions of Alternative I, that the perpetuation of ecosystems, forest health, and biological diversity is likely best served by the preservation of natural processes, including natural disturbance regimes. However, several realities dictate that full reliance on natural processes is neither possible nor practical. First, past and present human interventions have resulted in modified ecosystems and processes from natural conditions. Second, human development precludes full reliance on or allowance for natural disturbance processes to operate across the landscape. Third, recognizing the first two

circumstances, it will require a blending of the principles of Alternatives I and D to both hasten the return of forest patterns and processes to a more natural condition, and also to perpetuate the natural dynamic equilibrium inherent in those conditions once and where achieved.

Alternative D proposes to use an aggressive active management approach to regaining natural forest patterns and restoration of the natural distribution of productive wildlife habitats. In so doing, the Forest Service would place low emphasis on natural disturbance processes. We recommend a fuller blending of active management and natural disturbance processes. It is often difficult to mimic natural disturbance processes by active management. Logging, for instance, often does not recreate the aggressive and diverse regeneration and habitat conditions of natural fires. Logging is designed to remove biomass, whereas fire recycles it while leaving and creating a patchwork of habitat conditions.

A principle of Alternative D is that vegetation (and, therefore, habitat) pattern and structural conditions are, in at least some areas, distinctly different from natural conditions. Aggressive, active management would permit the most rapid progress in regaining natural pattern and improvement of wildlife habitat conditions. Depending solely on natural processes would take far longer and, in many areas, would be suppressed in any case because of human development. However, because natural processes are critical to the maintenance of natural pattern and functioning, FWS recommends that management direction accommodate and encourage natural processes (including fire, insect, disease, and lowdown) wherever and whenever possible. The Forest Service, under Alternative D, states that fire suppression would remain at current levels. However, fire suppression is one factor that has contributed to a shifting of forest pattern and structure from natural conditions. Therefore, FWS believes it is prudent to substantially decrease the system-wide level of fire suppression, while increasing the use of prescribed fire. Insect, disease, and wind induced disturbances also must be recognized for the intrinsic roles they play in forest regeneration and the creation of wildlife habitat elements.

The FWS recommends that fire and other natural disturbance processes be allowed to operate where they do not pose an imminent threat to human life and property. Prescribed fire should be used extensively where human development could be at risk and where accelerated vegetational changes are desired. In contrast to fundamental intent of wilderness designation, current policy is to suppress fire in most designated wilderness areas within the Southern Rockies ecosystem. Concern by some over the lack of ability to "manage" these areas to retain or regain natural landscape patterns fails to recognize that the existence of this management policy ensures that forests within wilderness boundaries continually shift away from natural patterns. The FWS recommends altering management of wilderness areas to allow natural processes, including fire, to fully operate, consistent with the intent of wilderness.

The FWS further recommends that the active management principle of Alternative D be incorporated as an adjunct to the function of natural processes. Active management should complement natural processes and be used where natural disturbance processes cannot be allowed to fully operate due to human development, and where more rapid alteration of

vegetation/habitat pattern or structure is desired. If desired future conditions are carefully mapped out, active management can be designed to help achieve those conditions more rapidly than through sole dependence on the somewhat random influence of natural processes. The FWS agrees that use of carefully selected and planned active management can more rapidly benefit the ecosystem and its dependent wildlife.

Under Alternative I, commodity production (including recreation) is accommodated to the extent that it does not fundamentally impair natural processes, the restoration of ecological functions, or the health of native plant and animal communities. The FWS believes this constitutes a management imperative. To do otherwise, causes system dysfunction and degradation, and long-term loss of resource yield. When desired conditions are understood, certain extractive commodity production (e.g, timber harvest and grazing) can be undertaken in a sustained yield manner, without damaging ecosystem functioning. But it is essential that sustained yield be viewed in an ecosystem yield context and not simply based on the sustained yield of a given commodity. Commodity yields must be determined and constrained by the health and natural functioning of the ecosystem generating those commodities.

Rather than planning timber harvest, for example, based on board feet yield, it should instead be based on achieving or maintaining desired natural conditions, or improvements in wildlife habitat. The FWS recommends that harvest management philosophy shift from one of generating output to one of generating a planned landscape outcome. Location, timing, and approach to harvest would change under this paradigm shift, but harvest would and could still occur. In fact, carefully designed outcome-oriented timber harvest will be an essential tool in managing for more nearly natural pattern and structure, and improving wildlife habitat in some areas, and to accelerate such changes. At the same time, the resulting harvest will help sustain the wood products industry and local economies.

Dispersed Recreational Opportunity

Recreational opportunity and use is an increasingly important commodity of our National Forest System lands. But as with extractive uses, the forest ecosystem has ecological limits on how much and the type of recreational use that it can absorb without suffering adverse effects to quality and functioning of the system. Not only have the number of recreational users increased dramatically over the years, and will continue to increase dramatically, but the technology available to forest users has profoundly impacted the nature and geographical reach of forest recreational use. Today, increasingly diversified and powerful mechanized options available to a wide range of forest users make virtually all areas of our National Forests accessible. Not only does this lead to a loss of opportunity for solitude and a natural experience that many seek when visiting the National Forests, but it increasingly results in soil, vegetation, and aquatic damage and is adversely affecting wildlife distribution and population health.

Many species of wildlife can and do adapt to human presence and activity, to varying degrees. But to sustain a healthy and naturally diverse wildlife community, it is important that wildlife

also have sufficient opportunity to carry on sensitive life functions in areas relatively free of human disturbance, as well as the opportunity to escape the stresses and dangers inherently associated with human activity. A variety of studies have documented the adverse effects of human activity and development on numerous wildlife species.

Today, many thousands of miles of National Forest System roads and trails permeate much of the Southern Rockies ecosystem. Over 4,000 miles of open National Forest System roads and trails exist in the WRNF alone. This total does not even account for the network of county, State, and Federal system roads that cross National Forest System lands. Further, access to off-road use is available in many areas, leading to widespread development of non-system and non-maintained roads, and the problems inherent with these volunteer roads. In short, motorized access is pervasive throughout large areas of the Southern Rockies National Forest System lands.

Despite assertions that the proposed WRNF direction will restrict a major portion of the public from access to a large percentage of National Forest System lands, even the most restrictive alternative (I) would still maintain over 1,600 miles of Forest System roads on the WRNF. The FWS believes the Forest Service's intent to close and reclaim non-system roads and certain system roads that are little traveled or have been identified as causing resource problems is sound and overdue management. Under these alternatives, the WRNF also would restrict motorized travel to designated routes. To FWS, this not only constitutes sound land management policy, but it is common sense. Motorized access off designated and maintained routes causes considerable and accelerating damage to soils, vegetation, and aquatic habitats. Such off-road use also contributes substantially to the ever increasing harassment of wildlife and loss of the solitude experience so valued by many forest users.

The FWS shares the views of the Colorado Division of Wildlife and the Forest Service that in many areas, the extent of open road access to motorized traffic is already detrimental to wildlife. To allow even more such opportunity will exacerbate this problem. Consequently, FWS believes the travel management principles embodied in Alternatives D and I are the prudent course of action for the Forest Service to follow. Because adoption of even the most restrictive of these alternatives would still leave widespread motorized access over large areas of the WRNF, the proposed alternative is anything but restrictive. The FWS recommends that the advice of District and Area Wildlife Managers for the Division of Wildlife relative to WRNF travel management be given careful consideration. These individuals, in conjunction with Forest Service biologists, bring considerable knowledge on road, trail, and use impacts on local wildlife and other natural resources.

Ski Areas and Other Commercial Recreational Development

The FWS also largely concurs with the proposed management direction of Alternatives D and I relative to commercially developed recreational facilities, such as ski resorts. Within the WRNF, land use allocation to ski area development is already unusually high. Furthermore, many of these ski areas are destination resorts with extensive base development and have served to spawn

extensive secondary development beyond the resorts themselves. Through the heart of this development is a four-lane Interstate highway. Summit County and eastern Eagle County constitute a vitally important linkage between the northern and southern half of the Southern Rockies ecosystem. The high concentration of resorts in Summit and eastern Eagle Counties, along with the associated and secondary expansive development, and I-70, is threatening ecosystem level connectivity. Connectivity through Summit County already has been virtually eliminated for most north-south wildlife movement. The last primary movement corridor is at Vail Pass, between the Vail and Copper Mountain ski resorts; and this is severely compromised by I-70 and the intensive recreational use between the two resorts.

The FWS cannot support further expansion of WRNF ski areas where such expansion may threaten, individually or cumulatively, landscape connectivity. There may be limited opportunities for expansion that do not carry severe environmental consequences. The Forest Service is already proposing to accommodate such opportunity under Alternative D by limiting future expansion to existing special use permit boundaries. In many cases, that retains considerable room for ski areas to grow, as most resorts still have substantial undeveloped terrain within their Special Use Permits. To fully utilize even that remaining terrain is likely, at least in some cases, to cause significant environmental harm. However, given the substantial residual expansion potential retained by Alternatives D and I, FWS believes the Forest Service has proposed a very reasonable compromise that retains considerable flexibility for future ski area development, while establishing some cap on the magnitude and extent of such development. The evaluation of future proposed development with existing SUP's can be handled through National Environmental Policy Act and Endangered Species Act review processes. At the same time, the SUP cap alerts resorts not to plan for expansions beyond the cap boundaries.

In the case of Vail, FWS has already established a position through its biological opinion on the Category III expansion that no further expansion of the Vail Ski Area should occur in a direction that further encroaches on lynx habitat and, especially, the Vail Pass linkage corridor. The FWS position is that development should largely be retained at the current development boundary, and the SUP boundary should be retracted to the development boundary.

Alternative B (No Action)

The FWS agrees with the Forest Service that maintenance of current management direction is not prudent. First, current direction emphasizes the production of goods and services based on demand, rather than managing WRNF resource use to be consistent with ecosystem function and sustainability. Second, current direction will not only maintain the existing problematic travel uses on the WRNF but allow for expansion of those uses. In both cases, FWS believes those strategies are counter to sound principles of land and resource management.

Alternative C

The FWS concerns relative to Alternative C center around recreation and travel management. Alternative C is billed as a "balance of recreational demand and ecological conditions." However, because FWS views current management as unbalanced in favor of motorized recreational uses, and this alternative would appear to further expand those opportunities, FWS questions how balance is to be achieved. The Service believes that land use allocations for ski area development are already excessively high, and the associated and secondary development resulting from that allocation is substantial. The result is a near blockage of north-south wildlife movement opportunity through Summit County. Alternative C would further expand ski area allocation, despite considerable residual expansion opportunity retained under Alternative D. The strategy for travel management is confusing, but appears to provide for some increases in motorized opportunity, including off-road use. Overall, it appears Alternative C, like the "no action" alternative will more closely align recreation management with demand than ecosystem sustainability. For that reason, FWS views Alternative C to be a less desirable management philosophy.

Alternative E

This alternative would manage for recreational demand; a management strategy that FWS believes would have widespread and permanent adverse implications for the health and sustainability of both WRNF and the Southern Rockies ecosystem. Under this management strategy, the endless increase in demand would inevitably sacrifice large areas of the forest and ultimately lead to isolation of the northern and southern halves of the ecosystem. The FWS cannot support the sacrifice of an ecosystem to unrestrained human recreational demand.

Alternative F

This alternative purports to maximize extractive commodities production and recreational opportunity while simultaneously maintaining species viability. The FWS cannot reconcile these as compatible objectives and believes this to be very similar in philosophy to the "no action" alternative. The FWS recommends against this course of management.

Alternative D

The FWS agrees with the fundamental premises for travel and recreation management forwarded in this alternative. The FWS also agrees with the Forest Service's proposal to undertake aggressive forest management to improve wildlife habitat and restore natural patterns and variability across the forest. The FWS does, however, have some concern over the de-emphasis of natural processes. The FWS believes that interference with natural processes has factored into the shift away from natural pattern and structure. This strategy assumes that logging and other manipulations are equivalents of natural disturbance processes. The FWS maintains they are not. Therefore, FWS strongly encourages a modification of this alternative, if selected, to fully

incorporate natural disturbance processes as an integral part of Forest management and ecosystem function. Active management should be used as an adjunct to essential natural processes where human development will necessarily restrict the free operation of certain natural processes and where it is desirable to accelerate changes in vegetation pattern and structure.

Alternative I

The philosophy of Alternative I embodies, for the most part, sound ecological principles. It recognizes that an ecosystem functions properly when allowed to operate naturally. It accommodates commodity production and recreation to a level that does not impair fundamental ecosystem functioning. Therefore, the thresholds of ecosystem dysfunction would properly determine the limits of resource extraction and use. This is sound land and resource management. However, the alternative also fails to recognize the existing human alterations and resulting dysfunction. To depend solely on natural processes would result in long time lags to rectify human caused problems and largely eliminate adaptive management. It further fails to recognize and accommodate the realities of human development and the resulting constraints forever placed on natural processes. Further, habitat improvement efforts are focused only on threatened and endangered species. While these are the species in greatest need, FWS believes it is prudent to follow through with the fundamental philosophies embodied in this alternative and manage in an ecosystem context.

FWS Recommendation

The FWS supports many of the concepts of Alternative D but recommends blending it with some of the ecological principles articulated in Alternative I in arriving at a final management direction for the WRNF. The FWS believes that maximizing the operation of natural processes together with carefully planned active intervention is the most prudent strategy. Active management can target deficient habitat conditions for accelerated remediation. Allowance for the maximum possible operation of natural processes will help restore proper ecological functioning and an improved range of quality habitat conditions. The FWS suggests a theme such as the following:

> *The fundamental philosophy of Alternative X is that all management and use of the White River National Forest must be consistent with sustaining the health, vigor, biodiversity, and fundamental functioning of the ecosystem. Alternative X recognizes that properly functioning ecosystems are best perpetuated by allowing natural processes to operate, including natural disturbance processes. It also recognizes, however, that past and present human intervention and modification of the ecosystem have often disrupted natural processes, imbalanced natural pattern, and disadvantaged wildlife; and that sole reliance on natural processes will produce changes only slowly and inhibit adaptive management. To most rapidly restore natural patterns and important wildlife habitats, the Forest Service would employ active management (e.g., timber harvesting and prescribed fire) as an adjunct to natural processes, especially in areas of human development and where accelerated changes are desired. The opportunity for both*

W10903

Martha Ketelle, Forest Supervisor 10

extractive and use commodities would be provided to the degree that fundamental ecological processes, balance, and biological diversity are not impaired. Limits on resource use will be determined by ecosystem health and sustainability.

- Biological Diversity--*Under this alternative, the Forest Service would seek to maintain healthy and diverse wildlife and vegetation communities throughout its historic range. Management activities would be focused on the accelerated restoration of wildlife habitats and natural ecological patterns. Natural processes would be allowed to operate where they do not imminently threaten human life and property.*

- Travel Management--*No off-road motorized or mechanized travel would be allowed. Summer motorized travel would be reduced, concentrated, or redirected to protect wildlife and vegetation, and open roads reduced in number and total mileage. Winter motorized travel would be restricted to designated areas and routes to protect wildlife, and total acres open to motorized use will be reduced.*

- Recreation--*Timber harvest would be planned and implemented to produce desired outcomes related to ecosystem health and wildlife habitat. Roads constructed for harvest or vegetation manipulation will generally be obliterated and restored.*

The FWS also points out a standard in the Lynx Conservation and Assessment Strategy that requires full identification of all important landscape linkages (both natural and human induced), as well as development and implementation of plans for permanently protecting their linkage functions for the intra-system movement of wide-ranging wildlife. This does not yet appear to have been accomplished in its entirety through this proposed plan revision.

The Department appreciates the opportunity to provide input to the Forest Service as it seeks to establish new direction for the management of the forest ecosystems under its charge. We again complement the Forest Service on both its efforts and willingness to address difficult but necessary changes to management direction and philosophy. In turn, we offer whatever assistance we can provide in planning and implementing those changes.

Sincerely,

Robert F. Stewart
Regional Environmental Officer

W11544

CITY of RIFLE

202 RAILROAD AVENUE • P.O. BOX 1908 • RIFLE, COLORADO 81650 • (970) 625-2121 • FAX (970) 625-3210

2000 MAY -7 PM 12:06

May 5, 2000

Martha Ketelle, District Supervisor
White River National Forest
P. O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

On behalf the City of Rifle, I wish to voice support for the continuation of a potential ski area in the White National Forest near Rifle. We have had preliminary discussions with a potential ski area developer. While the City has made no commitment relative to any facet of the development, we recognize the value which such a ski facility and development would have for the people in this area, on the western slope of Colorado and parts of Utah, and Wyoming. Accordingly, the City would value the careful and properly financed development of a ski area south of Rifle.

The City Council did formerly act to endorse the draft alternate plan for future use of the White National Forest.

If you have questions, please feel free to call me.

Sincerely,

Selby Myers
City Manager

cc: Mayor and City Council
Mr. Dan Roberts



May. 8. 2000 1:13PM

W11580

SNOWMASS VILLAGE

Community Development Department
• Building
• Natural Resource Management
• Planning

May 8, 2000

Martha Ketelle, Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Dear Ms. Ketelle:

Thank you for allowing the Town of Snowmass Village the opportunity to provide comments regarding the Draft Forest Plan, Draft Environmental Impact Statement (DEIS), and Travel Management Plan for the White River National Forest. The White River National Forest accounts for nearly 40% (6,600 acres) of the land within the Town of Snowmass Village. Therefore, management decisions regarding federal land use will have a direct impact on the Town's economy, wildlife, environment, and quality of life.

The Town of Snowmass Village would like to express their general support for Alternative D as contained in the DEIS. We believe Alternative D strikes a fair balance between both economic growth objectives and environmental protection concerns. In our view, Alternative D represents a sustainable approach to managing the natural resources within the White River National Forest.

We would, however, like to offer the following comments.

1. We agree with the management prescriptions for wilderness and non-wilderness trails within the Snowmass Village area per Alternative D.
2. We would recommend the seasonal restriction designation for the following trails in our area:
   a. Government (FDT 1980.): May 15 to June 20, and October 30 to November 30.
   b. Tom Blake (FDT 1976.): April 25 to June 20, and October 30 to November 30.
   c. Anaerobic Nightmare (FDT 1980.1): April 25 to June 20, and October 30 to November 30.
3. Future Trails: We support the allowance of planned additional summer trails as indicated within the 8.25 management prescription (ski-based resorts-existing and potential).

P.O. BOX 5010 • SNOWMASS VILLAGE, COLORADO 81615
(970) 923-5524 • fax (970) 923-1861 • plan@tosv.com • www.tosv.com

May. 8. 2000 1:14PM

W11580

4. Aerial Transportation: We support management prescription 5.43 (elk habitat). Should aerial transportation between Buttermilk Ski area and Snowmass Village become a viable proposal, then we strongly recommend a review process which includes the Town, Pitkin County, and the USFS.

5. Wildlife: We applaud the Forest Service for their emphasis on wildlife protection and ecosystem diversity. Wildlife preservation has long been a community value in Snowmass Village. Both our Comprehensive Plan and Municipal Land Use Code provide measures to protect and enhance this community value. We believe the actions outlined in Alternative D will compliment our efforts. Towards this end, we support the closure of the vacant domestic sheep allotments in Brush/East Snowmass listed on page 3 – 137, Table 3 – 29. Further, we endorse the 5.43 Elk Habitat prescription on the lower sections of Burnt Mountain. This fulfills the obligation in the 1994 FEIS, Record of Decision for the Snowmass Ski Area, page 20, D.

6. Travel Management:
   a. Summer: We support the closure of all trails unless posted as open. In addition, all motorized vehicles should stay on designated roads.
   b. Winter: We support the strict management of recreational snowmobile use, especially on the upper reaches of Snowmass Mountain within the 5.42 bighorn sheep habitat prescription.

7. On Tuesday, January 11, staff met with Pitkin County representatives to discuss draft comments from both jurisdictions. Based on this meeting, the comments as mentioned in this letter are consistent with Pitkin County.

Once again, thank you for the opportunity to provide comments. Should you have any questions regarding the comment contain herein, please contact me.

Sincerely,

Kevin M. Costello

Snowmass Village Town Council
By
Kevin Costello
Council Member

5-08-200 4:25PM FROM TOWN OF MEEKER 970 878 4513 P 1

W11609

TOWN OF MEEKER

236 7th Street • P.O. Box 38
MEEKER, COLORADO 81641
Phone: 970-878-5344
FAX: 970-878-4513

05/06/2000

Ms. Martha Ketelle, Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, Colo 81602-0948
Fax: 970-945-3266

Dear Ms. Ketelle:

RE: Proposed White River National Forest Plan.

The Board of Trustees of the Town of Meeker, Colorado are writing this letter to encourage the White River National Forest to continue its present Forest Plan which was written in 1984. We think the forest is in the best shape it's been in for many years. We want to encourage the continued use of this wonderful asset in a wise and conservative manner, but people need to be figured into the plan as a primary user and not left on the outside looking in. Recreation and grazing on the White River National Forest play a large role in our local economy. We also need to keep in mind that the forest reserves were established to provide for timber production and water shed management. Present Wilderness Areas are very important parts of the forest management plan, but we don't think any more wilderness area should be set aside. They create problems in trail management and rescue efforts and since we are an aging population they create areas only the young and hardy can enjoy. We want to encourage a plan that will allow for local district decision making and not a one size fits all approach. We are concerned about some of the water policies being proposed, in particular, the 10% set aside of existing water rights when renewing structure easements. Colorado water law adequately protects and administers our streams for the beneficial use of our citizens. We have read and endorse both the Colorado Water Conservation Board's and the Colorado River Conservation District's letters of comments to you.

We don't agree that Alternate plan D is best for Blanco District and the White River National Forest and recommend that if a change is needed in the present forest management plan that Congressman Scott McInnis' modified alternate plan C proposal be considered.

Sincerely,

Bill Dunham
Mayor

CC: Scott McInnis
Rio Blanco County Commissioners
Colorado River District and CWCB

W11887

DEPARTMENT OF THE ARMY
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON DC 20310-0600

REPLY TO ATTENTION OF

09 MAY 2000

Army Environmental Programs

Ms. Martha J. Ketelle
Forest Supervisor
Forest Plan Revision Comments
White River National Forest
Post Office Box 948
Glenwood Springs, Colorado 81602

Dear Ms. Ketelle:

The Army appreciates the opportunity to respond to the proposed revised Land and Resource Management Plan (LRMP) for the White River National Forest and the Draft Environmental Impact Statement (DEIS). We are responding in accordance with the comment period extension published in the Federal Register, Vol. 64, No. 246 on December 23, 1999 (64 FR 72064) as FR Doc. 99-33368.

The Army and the USDA–Forest Service have a long history of cooperation. The Army training activities that take place on several National Forests are vitally important to our mission and national security. An historic example of this working relationship is the former Camp Hale, original home to the 10th Mountain Division, which is part of the White River National Forest (WRNF). A more recent example is use by the Colorado National Guard for winter training activities on numerous occasions during the last 10 years. The Army is interested in ensuring that these uses and future opportunities are not inadvertently precluded by revisions to individual National Forest Plans.

The Army is particularly concerned that the DEIS restricts forest use for recreational purposes inherently restricting military use, and that recent USFS policy direction might limit access and multiple use of the WRNF. The Army supports a multiple use concept on National Forests that would continue the policy of issuing Special Use Permits (SUPs) and allowing military training where specific activities would be compatible with LRMPs and Best Management Practices (BMPs).

Thank you for affording us the opportunity to comment on this matter. Please contact the Army Staff point of contact, Mr. Bill Woodson, 703-693-0680, if additional information is needed.

Sincerely,

FOR Stacey K. Hirata
Colonel, Engineer Corps
Director, Environmental Programs

W11890

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922

REPLY TO ATTENTION OF

May 8, 2000

Regulatory Branch (200075181)

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
Post Office Box 948
Glenwood Springs, Colorado 81602

Dear Ms. Ketelle:

We are providing you with our comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Revised Forest Plan for the White River National Forest (the Plan). We appreciate the opportunity to comment on the Plan as the implementation of your plan will affect our administration of the Section 404 of the Clean Water Act Program in the geographic area covered by the White River National Forest.

We first would like to offer our support for your preferred Alternative D. We compliment you on the development of this alternative and your choice of D as the recommended preferred alternative. Alternative D appears to protect the biological and physical integrity of the forest while still providing for reasonable human use and recreational opportunities. We realize the tremendous pressure that you have received from various groups opposed to this alternative but urge you, due to the importance of the plan, to continue the development of the plan based on sound scientific principles.

As you know, our program concentrates on the aquatic ecosystem and the avoidance, minimization, and mitigation of impacts to aquatic resources. However, our regulations also require us to consider a wide range of environmental and social factors in our decisions on Section 404 of the Clean Water Act permits including general wildlife. One of the reasons that we support your selection of Alternative D is the importance of this alternative on wildlife habitat, ecosystem functions and biological diversity. To provide you with specific wildlife related comments, we are enclosing the original comments of the Colorado Division of Wildlife (CDOW). We would like the specific issues of the District Wildlife Managers for each ranger district considered, and we obviously endorse CDOW's overall support of Alternative D. You and your staff are commended for working closely with the CDOW during the scoping process to develop an alternative that benefits wildlife.

W11890

We really only have one comment on the plan which you may consider a negative comment and a few specific comments. However, we realize this one comment may create a substantial amount of work for the final EIS. We believe this issue is important enough to warrant that extra work and offer whatever assistance that we can in the development of a land management category for waters of the United States, including wetlands.

Waters of the United States Including Wetlands:

The Land and Resource Management Plan document contains both the Forestwide Standards and Guidelines and the Management Area Direction. There are 8 Categories of Management Areas and 33 Sub-categories under those 8 main categories. There is not a sub-category for waters of the United States, including wetlands. **We believe that a new sub-category should be created for waters of the United States incluiding wetlands.** This sub-category would fit under Category 2 or 3.

The previous Forest Plan for the White River included a management area for Riparian Areas, 9A. The label riparian areas included wetlands adjacent to streams and lakes. We are not sure if it would have included the slope wetlands present on the Forest that are not adjacent to any open water bodies. It is difficult to imagine with the additional knowledge we now have on the importance of wetlands and riparian areas, and the additional attention and protection they have received through Federal, state and local regulations, that the new Forest Plan would not include a management area for wetlands and riparian areas. We have suggested that the management area be termed waters of the U.S. to include wetlands; however, your label could be riparian areas provided you include all wetlands on the Forest. We believe you should include all streams, lakes and ponds in addition to wetlands and riparian areas to highlight the importance of these features in the total ecosystem.

Within the White River National Forest, the aquatic ecosystem is a major and vital element of the entire ecosystem that Alternative D attempts to protect. The aquatic resources found within the many miles of streams or in the acres of lakes found on the Forest are key to the overall health of the Forest ecosystem. The wetlands found adjacent to streams, on the slopes, or in meadows not only provide critical habitat for a variety of wildlife species but improve and maintain water quality, stabilize streams, reduce flood damage, maintain baseflows, and provide recreation opportunities. The best way to protect these valuable resources is through the inclusion of those resources as a specific management area.

The Forestwide Standards and Guidelines will not provide adequate protection for the streams, lakes and wetlands on the Forest. For instance, under Water and Aquatic Resources, Standard 8 is the only standard that specifically mentions wetlands. Standard 8 refers to protecting wetlands to sustain their ecological function per the 404 regulations and specifically the 404 (b)(1) Guidelines. The Section 404 program and the Guidelines only apply to projects that involve a discharge of dredged or fill material in waters of the United States, including wetlands. Many activities occur on the Forest that impact wetlands do not require a discharge of dredged or fill material, and hence the 404 regulations do not apply. The removal of trees and shrubs by cutting basically degrades a forested wetland removing many of the functions that system provides. Cutting of trees and shrubs does not trigger the 404 (b)(1) Guidelines. Similarly, excavation or dredging alone in wetlands does not require a 404 permit.

The standard cannot rely on the 404 (b)(1) Guidelines (Guidelines) as a basis for activities the Forest Service regulates when those activities do not require a discharge. The Guidelines were developed specifically for the Section 404 program and deal with projects involving discharges of dredged or fill material. Section 230.10 (a) of the Guidelines pertains to the practicable alternatives to a discharge of dredged or fill material. The remaining portions of the guidelines have very specific impact analysis features including a requirement for a finding of **significant degradation** of waters of the United States (230.10 (c)). The significant degradation threshold is often difficult to prove and large substantial impacts to the aquatic ecosystem will occur forestwide before a significant finding could be made.

Standard 8 should also refer to the Corps of Engineers regulations at 33 CFR Parts 320 to 330. The 404 (b)(1) Guidelines, although important, are only a part of the regulations employed under the Section 404 program.

The development of a management area for waters of the U.S. including wetlands will offer better protection of these valuable resources for a number of reasons. First, it will highlight these resources during a typical NEPA review by Forest Service personnel for any project. The Standards and Guidelines are similar to typical Best Management practices that we, and you, have employed for a number of years. The problem with best management practices is that they are often either overlooked by the permit holder, or at best tacked on at the end of a project review with less than vigorous enforcement. Both your agency and ours rarely have the resources to enforce best management practices adequately.

The Standards and Guidelines refer to the Watershed Conservation Practices Handbook (WCP) for many of the standards. The WCP provides good direction for managing for the overall health of a watershed but it does not directly address the types of wetland impacts that occur on the Forest, and they also rely on the Section 404 Program. For instance, 12.4 Standard (6) of the WCP states "maintain long-term ground cover, soil structure, water budgets, and flow patterns of wetlands to sustain their ecological function, per 404 regulation. There is nothing in the 404 regulations which address ground cover, water budgets, soil structure or flow patterns; therefore, the 404 regulations cannot be relied on to implement these worthy practices. The removal of vegetation without mechanized land clearing or filling does not require a 404 permit nor does ditching in wetlands to drain hydrology provided the excavated material is removed to an upland.

If a category was developed for waters of the U.S. and wetlands, your staff reviewing the project would first need to look at those resources paying attention to the theme, management area description and desired condition in the Plan. More attention and detail would be provided to these resources in your review before approving any project impacting waters of the U.S. and wetlands. We realize that a category designation for waters of the U.S., including wetlands, would not preclude any impacts to wetlands, however, we do believe they would receive better protection than the application of Forestwide Standards and Guidelines, including the Watershed Conservation Practices Handbook. The high quality streams, lakes and wetlands on the White River National Forest warrant as much recognition and protection as some of the other management area categories identified in the Plan.

Specific Comments:

1. Biological Standards and Guidelines, Page 2-7 of the Management Plan: Table 2-1 provides minimum requirements for snags and downed logs per acre based on forest type. For spruce-fir, only 150 feet of 10-inch diameter downed logs (diameter measured at the larger end) is required. This could mean two fairly long trees (75') on the ground per acre would suffice to meet this requirement. Large woody debris (LWD) is an important aspect of the forest ecosystem and it seems that two, or even three trees, is barely enough to provide the reduction in runoff, organic material, denning sites and diversity needed for a productive forest landscape. Doubling of the minimum requirement may approach what is needed. The diameter and numbers of downed logs should also be larger to account for the listing of the lynx (**Lynx canadensis**) to provide denning habitat.

2. **Appendix F**, Management Plan, Figure F-1: This figure needs another overlay depicting recognizable geographic features to provide for easier recognition of the assessment areas. Not every reader is as familiar with the boundaries as your staff. Do the minimum percentages of old growth and late successional acreage include those areas within wilderness? If so, it seems that the minimum percentages are low. You could effectively meet the requirements in some assessment areas with the forests within wilderness areas and have little or no late successional areas or old growth outside of the wilderness boundaries.

3. **Management Plan, Core Areas 1.41,** pg 3-14: These areas will be important in maintaining viable wildlife populations in the rapidly developing area surrounded by the White River National Forest. Under the Mineral and Energy Resources Guideline 1, the plan still allows for oil and gas leasing with appropriate stipulations to meet management objectives. If the Core Areas are developed to maintain biological diversity and the to perpetuate the plant and animal species found, the allowance of oil and gas development seems to be a contradiction. Oil and gas development requires the construction of roads and pads for drilling. Many of the wildlife species requiring the protection of a Core Area reserve necessarily need seclusion from this type of development. The Core Area with oil and gas development would no longer function as a Core reserve. The Plan calls for the withdrawal of mineral entries; why not also withdraw oil and gas development, or at least prohibit surface occupancy?

Again, we thank you for this opportunity to comment and your choice in Alternative D as a preferred alternative. You and your staff are commended for working to preserve the resources that your agency is charged with protecting for future generations. If you have any questions, please write to Mr. Michael Claffey or telephone (970) 243-1199, extension 13.

Sincerely,

Grady L. McNure
Chief, Northwestern Colorado
Regulatory Office
402 Rood Avenue, Room 142
Grand Junction, Colorado 81501-2563

Enclosure

W11890

Copies Furnished:

Mr. Ron D. Velarde, Colorado Division of Wildlife, 711 Independent Avenue, Grand Junction, Colorado 81501
Mr. Al Pfister, U.S. Fish and Wildlife Service, 764 Horizon Drive, Building B, Grand Junction, Colorado 81506-3946
Ms. Sarah Fowler, U.S. Environmental Protection Agency, 8EPR-EP, 999 18th Street, Suite 500, Denver, Colorado 80202-2466

W11890

STATE OF COLORADO
Bill Owens, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

John W. Mumma, Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192

For Wildlife-
For People

Date: December 17, 1999

To: Greg Walcher, Executive Director, Department of Natural Resources

From: John W. Mumma, Director, Division of Wildlife

Re: Comments on Draft White River Forest Plan Revision

The Division of Wildlife has always worked closely with Federal Land Management agencies in developing their management plans. In the case of the White River National Forest Plan the Division has been involved since 1996, providing input and analysis as it relates to wildlife management. The attached comments are focused on analysis of the Forest Service's Preferred Alternative D. From a wildlife perspective, this alternative addresses virtually all of the concerns the Division expressed during the scoping process in 1998, and covers them more thoroughly than any of the forest plan revisions we've seen thus far.

The proposed plan contains more acreage in more wildlife-oriented management prescriptions than any other new plan. Big game winter ranges are protected, bighorn sheep management areas are identified, management for T&E and declining species is enhanced, the Colorado River cutthroat trout would benefit, and major steps are taken toward management of off-road vehicle (ORV) use.

The dramatic increase in ORV activity has been a major concern to us for a number of reasons. We have demonstrated in studies in the Flattops area that ORV activity has moved elk off the forest to private lands shortly after the beginning of hunting seasons in September. This causes us problems in two ways. First, with large numbers of elk moving off the forest for the balance of the hunting seasons, we are not able to achieve our harvest objectives. This then exacerbates the second problem, which is an increase in game damage caused by elk on private lands adjacent to or near the forest. Increasing movement of elk from public to private lands during hunting seasons is hampering our ability to reduce elk herds to our management objectives. Alternative D allows implementation of a travel management plan that both opens and closes roads, thereby actually managing ORV recreation in a way that benefits the management of big game herds and our provision of hunting opportunity.

Additionally, Alternative D provides an array of potential management tools to benefit the full spectrum of wildlife species, certainly including threatened and endangered and declining species. Road density standards, watershed conservation guidelines and the designation of special interest areas are three of these potential management tools. Special interest areas proposed for the Colorado River cutthroat trout and for the boreal toad would, for example, improve our ability to protect and, if necessary, recover those species.

DEPARTMENT OF NATURAL RESOURCES, Greg Walcher, Executive Director
WILDLIFE COMMISSION, Chuck Lewis, Chairman • Mark LeValley, Vice-Chairman • Bernard L. Black Jr., Secretary
Members, Rick Enstrom • Marianna Rafroopoulos • Arnold Salazar • Robert [illegible]

W11890

There are some things in the plan that we think could be improved. There are areas where elk movement off the forest is not an issue and we would like to see some roads proposed for closure remain open. Some areas closed to snowmobiling could remain open without harm to wildlife. Some of the standards and guidelines for the wildlife prescriptions should be stronger and more specific. All in all, however, the proposed plan represents the best effort the Division has seen so far to manage the many uses of a national forest while protecting Colorado's natural resources and maintaining the long-term productivity of the land.

The enclosed lengthy set of detailed comments follows a format recommended by the White River National Forest (WRNF). The first section includes forest-wide comments and the second section presents comments pertinent to each of the several ranger districts in the WRNF.

Division staff will continue to work with WRNF staff and others to address issues raised in the draft plan. If additional comments are warranted, we will follow the current procedures for departmental coordination.

The White River National Forest Plan will have a significant impact on western Colorado for years to come. We believe the time is right for that plan to emphasize the protection and enhancement of the wildlife resources and wildlife-related recreation opportunities that are so important to western Colorado communities. We believe the Preferred Alternative provides such emphasis while balancing wildlife interests against other important forest-related interests.

Please call me if you have questions about our comments or if we can help incorporate them into the consolidated comments prepared by the Department of Natural Resources.

Enclosure

cc: (without enclosure) Leadership Team, Ron Velarde, Mike Grode, John Toolen

W11890

Colorado Division of Wildlife
Western Region

COMMENTS ON DRAFT WHITE RIVER FOREST PLAN REVISON/EIS

December 16, 1999

General

The wildlife bounty associated with the White River National Forest is a historic and cultural tradition. If we wish to preserve this tradition, then a commitment that conservation is our true land legacy is needed. Support for the preferred alternative affirms "conservation as wise use" (Gifford Pinchot). Alternative D does not propose locking away the forest's resources as some media reports seem to portray. It calls for maintaining a very active management program that can be expected to benefit wildlife to a greater extent than any of the other alternatives. Livestock grazing would remain at or near current levels. Fire, through natural and prescribed ignition, would be reintroduced to a larger acreage than at present. Suitable timber acreage is higher than in several other alternatives with an allowable cut of 9mmbf. This could increase to approximately 12 MMBF if wildlife habitat projects are cut commercially. The principal difference between Alternative D and other alternatives is that vegetation treatments under Alternative D would have benefit to wildlife habitat at the core of the decision making process.

The information provided supporting the purpose and need for a change to the forest plan, including the revision topics (DEIS pages 1-6 through 1-9), is well documented and deserves CDOW support. The extent to which CDOW was included in the public involvement and cooperation in the plan revision is commendable.

The selection of the six alternatives and the descriptions provided for each alternative (Chap 2) is thorough and complete. The analysis in the DEIS regarding wildlife is also thorough and complete and deserves CDOW support. The Biological Assessment and Biological Evaluations as presented in appendix N are well researched and documented. They include thorough analysis.

The Affected Environment and Environmental consequences sections of the DEIS provide thorough assessments and accurate descriptions of the direct and indirect effects on wildlife (pages 3-167 through3-222). The section discussing the overall and direct and indirect effects on wildlife is of critical importance (3-206 through 3-213). The discussion regarding Research Natural Areas is important as they provide large areas to conserve biological diversity.

W11890

Timber Management:

Generally, CDOW favors obliterating closing and roads immediately after logging; logging sales and harvest should not be dragged out for years. The length of time a timber sale can remain open for bid and harvest should be defined. Some "5" year sales have been open for 16 years due to contingencies in the sale contract. "Get in and get out" sales tend to have the least impact to wildlife.

ASQ (Allowable Sales Quantity) needs to be adjusted to account for logging in roadless areas through the use of helicopters. At present, the ASQ is only used for areas that can be economically timbered with the use of roads. It has been shown in the South Wagonwheel deadwood timber sale and the logging of green trees in Vail's Cat III that the use of helicopter logging is possible. By recognizing the ability to helicopter log, many present roadless areas can have the vegetation manipulated for better resource management instead of just treating areas with roads or having to build new roads.

Management Area Prescriptions:

5.42 Bighorn Sheep

The USFS recommends the standard that grazing by domestic sheep is prohibited unless adequate temporal and spatial separation can be demonstrated. We concur with this recommendation and feel that the close association of domestic sheep and bighorn sheep is the number one problem facing bighorn sheep. While there are not many 5.42 areas recommended in the WRNF plan, this does make a firm statement of the potential disease problem.

Concerning bighorn sheep and domestic sheep allotments, the WRNF, CDOW and several woolgrowers (Randy Campbell, John Jewell, Joe Sperry, Steve Dahmer Piney Valley Ranch manager)) met in the Fall 1997- Spring 1998 to resolve some of these issues. We came to an agreement that several domestic sheep allotments that were vacant should not be filled due to the fact the surrounding areas had changed so much that the domestic sheep allotments were no longer viable or the allotments were never good for domestic sheep in the first place. These allotments are listed in table 3-29 page 3-137 (Draft Environmental Impact Statement). These allotments should be considered for permanent closure to benefit bighorns in the Avalanche, Snowmass/Maroon Cr., Battlement Mesa, South Fork White River and Glenwood Canyon sheep herds. Also, the group recommended that the cattle allotments listed table 3-28 (same page and document) not be converted to sheep allotments without coordination with the CDOW. We think these are sound recommendation that should be implemented in the new WRNF plan. These recommendation will still leave many bighorn sheep in jeopardy with contact from domestic sheep but this is a compromise that was reached to protect the best domestic sheep grazing allotments and at the same time protect bighorn sheep in a few areas of the WRNF where domestic sheep are currently not grazed but could in the future. These recommendations also allow for some vacant domestic sheep allotments to remain in the event there is a need in the future due to drought or an increase in the industry.

5.45 Forest Carnivores

Land and Resource Management Plan page 3-66 – 5.45 Forest Carnivores. The desired condition talks about the need for dense regeneration of conifer forest types, which provide habitat for snowshoe hares used by food by lynx. This is probably the most limited habitat condition for lynx in Colorado and thus the most needed. Some of the worst coniferous habitat types for snowshoe hare and lynx could be the lodgepole pine forests. The WRNF plan states that the forest currently has about 2% of the lodgepole pine in the 1-20 year age class while in 1887, 24% of the forest was in this structural stage. Lodgepole pine forests may have the highest potential to produce high densities of snowshoe hare for lynx and other forest carnivores and raptors. However, when these forests mature, they shade out the understory and become almost biological deserts and only provide a little habitat for red squirrels or hiding cover for big game such as elk. While we still need to preserve some mature to old growth lodgepole pine, present conditions are outside the historic range of variability (HRV). From an ecological standpoint, it appears the WRNF needs to treat more lodgepole pine forests to obtain a younger 1-40 year age class. This treatment would probably be best by prescribed burns and "let burn" natural fires. The next best method would be by commercial logging. Pre-commercial thinning should be avoided or only be used to maintain the highest ground cover possible. Thinning could occur once the trees mature and start to self prune the lower branches above the highest snow level. The juxtaposition of the treatment should be in areas that connect with the existing populations of S-F or other snowshoe hare habitats that will allow for hare colonization and dispersal.

The plan states that the Spruce-Fir forest are within the range of historic and this is good snowshoe hare and lynx habitat. While we agree with this statement, preliminary data from our snowshoe hare track surveys indicates that old growth forest are not as productive to snowshoe hares as mature forests. Therefore, it may be necessary to treat some old-growth S-F to improve snowshoe hare habitat. Forest Carnivores 5.45 standards for vegetation management (standard 1.) preclude S-F as part of the allowable sale quantity.

There should be a combination of 5.45 with any of the wilderness prescription in several places, however without a better vegetation map and larger scale map drawing in these now would be mostly guess work. These combination areas would provide the continuous connective corridors for migration.

7.1 Intermix

Although we do not totally agree with the removal of the urbanization part of the plan, the USFS lands should not be considered as mitigation lands for private development. Private development should be required to keep the impacts from their development within the boundaries of their lands. This would include the need for recreation. Each development should have a plan to handle the recreation needs of the development on their property. This would include parks and trails that allow the residents of the development a place to walk, jog, x-country ski, and bike or walk their dog in the morning or evening. The weekend recreation would most likely still occur on the USFS lands but the before and after work

W11890

recreation could be handled on site. We continue to see development built on the USFS and BLM boundary selling real estate as having protected open space in your backyard. These developments are having a significant adverse impact on wildlife habitat on public lands, yet developers are not required to mitigate the impacts.

8.31 Aerial Transportation Corridors

With the experience of a ski lift placed over big game winter range (Westin Lift at Vail, another lift at Steamboat), there is little doubt that aerial transportation will negatively impact big game winter range. The Westin lift was built with the restrictions that there would be no skiing under the lift and that the lift corridor would be narrow as possible to reduce loss of cover and habitat fragmentation. The lift line ended up being cut to provide a better visual sight. The lift line is up to 80 yards wide in some areas. The lift line is skied by people looking for powder and not wanting to take a catwalk back to the Westin Hotel. The ski patrol or the public skis it regularly to retrieve items they have dropped. Elk use under the lift and within sight distance of the lift has been significantly reduced. Elk now winter in the drainage to the west, which provides visual security cover from the lift. Night use has been monitored by noting tracks in the snow to document nocturnal feeding; this use has also been significantly adversely impacted. The first couple of years after the lift the elk did feed in the area at night. But as lift use and skiing both increased, night use by elk has decrease by 50% or more. The compaction caused by skiing especially on limited snow greatly increases the energy necessary for the elk to forage. As the snow depth increases and the lower layers have been compacted by skiing they have a negative energy gain. The energy required to get the forage is less than the energy available in the forage.

The need to clear the corridors for aerial transportation will result in loss of habitat, increase fragmentation for all interior species and favor undesirable species (i.e. cowbirds) that are out-competing the native species. The need to maintain the corridor for maintenance, repair and rescue operation will result in a permanent loss of habitat. Once the corridor is cut recreation activities will follow both summer and winter. Such recreation will further increase the negative impact from the corridor itself. The ski area and the USFS have been unable to prevent the skiing of a very short lift line (Westin Lift) that is 100% visible from I-70 there is no way they can prevent the recreation use of a corridor that span between different ski areas. The need for access in the winter to repair equipment and rescue people if the aerial transportation becomes disabled will require the ongoing packing of the snow to facilitate the access in critical times. This snow packing will increase the negative impact from the corridors. This impact will not just be to big game but to small mammals and spring green up times from snow compaction. Studies in Canada have documented the delay in green up and reduced biomass in the spring due to snow compaction. All of these items will significant adversely impact wildlife as spring green-up is a critical period. Reduction in biomass will impact birth weights and early reproduction success for small mammals.

The Draft Environment Impact Statement (pg. 3-197) provides a discussion on connectivity; the discussion includes four areas of concern. The concern is the loss of

connectivity for wildlife to be able to freely migrate between habitats. Three of these areas are possible sites for aerial transportation corridors. If these areas are already of concern, the addition of aerial corridors would have significant adverse impact to wildlife.

Aerial corridor should not be allowed to conflict with the management prescription of the land under it. Restrictions on periods of operation (i.e. no 24 hour operation). The aerial transportation must be proven to be an overwhelming benefit to the public, not an amenity for a neighborhood, hotel or a recreation resort. The aerial transportation corridors are not the same as power lines and the impacts and construction needs are totally different.

Ski Areas

In the Draft Environment Impact Statement on page 3-348, the section on higher skier density tries to state that people expect solitude when they visit a ski area. It further states that the increase density will reduce the chance for adventure. The section also states that crowding would require more intensive clearing of trees. The result according to the section is increased fragmentation and greater impact to wildlife. A greater impact to wildlife compared to what? Certainly not a new ski area, or expansion into undeveloped terrain. In reviewing the bird study done at Vail and other ski areas by Rick Thompson of Western Ecosystems Inc., the current level of clearing has already created so much fragmentation that habitat for mature forest obligate species is lacking. A principal rule in wildlife protection is that impacts should be concentrated rather than dispersed. The document does not provide data on the impact from opening resorts to night skiing as a method of increasing the skier capacity and decrease crowding without additional terrain. This would have less impact to wildlife in most case than development of new areas. This section also assumes that the public only comes here to ski. More people are coming to resorts for activities other than skiing.

Travel Management

When the Plan discusses summer and winter travel management, are there definitions that define what is "*winter*" or "*summer*"? There should be dates, i.e. winter=12/1-4/30 and summer=5/1-11/30.

The requirement in Alternatives C and D that mechanized and motorized users remain on designated trails or roads will provide the greatest improvement of habitat values for terrestrial wildlife and reduce sedimentation in aquatic habitats.

Winter travel management, as described in Alternative D, should have little or no negative impact on wildlife. The winter travel management plan restricts snow machines to designated trails across areas managed for deer and/or elk winter range (Management Prescription 5.41) while allowing unrestricted winter use at higher elevations not used by big game in the winter. Winter vehicle use should be minimized in Management

W11890

Prescriptions 5.41 (Deer/Elk Winter Range) and avoided in Management Prescription 5.42 (Bighorn Sheep Habitat).

Standards & Guidelines

Alternative D prescribes an emphasis on biodiversity, but for most wildlife-oriented management area prescriptions, few wildlife standards are included. Wildlife techniques or thresholds are usually guidelines instead of standards. The thresholds need to be standards, especially in wildlife management areas.

- Water and Aquatic Resources: Standard # 1 requires maintenance of a minimum of 70% of potential aquatic habitat. Conversely, this allows the loss of up to 30% of potential aquatic habitat. This strikes us as an overly low standard when the goal, in streams capable of supporting a self-sustaining fishery, especially in cases where Colorado River cutthroat trout are involved. Standards #2 and #3 talk about protecting a stream from impacts from harmful runoff. This suggests leaving buffer strips along the riparian zone on both sides of a stream. This is good but if that is what these standards are about then it should be stated that way. The widths of riparian zones vary greatly from stream to stream and even between different reaches of the same stream, so it would be difficult to apply a specific buffer zone width for all streams. A standard should be adopted that states an undisturbed buffer zone will be left along both sides of all streams and that the width of this zone will be evaluated on a case by case basis. In incised channels where riparian zones are very narrow, a buffer zone may need to be wider than the riparian zone to protect a stream from harmful runoff.
-
- - Management Area 5.4, Forested flora and fauna habitats, page 3-58. There are no WILDLIFE Standards and only one guideline that deals with native fish. Standards for flora and fauna that take this prescription in a different direction than the rest of the prescriptions would seem logical. If not, why have it? This was the apparent logic behind the phase-out of the old 4B "Management Indicator Species" prescription in the first generation of forest plans. The reasoning seemed to be that no one could figure out what to do differently there than in any other prescription. Perhaps standards should be developed that give priority to species that are more limited in their habitat requirements.

The second guideline for INFRASTRUCTURE sets a road density limit of 2 miles per square mile. This is a very high road density and even in the most heavily roaded areas of the WRNF, the average density doesn't approach this. A more realistic road density number would be 1 mile of road per square mile.

- Management Area 5.41 Deer and elk winter range, page 3-60. The first guideline for WILDLIFE is rather ambiguous and needs to be strengthened and clarified. It is hard to believe in a critical management area such as this there are no Standards. An example of a specific particular standard could be something like "Travel is restricted to designated roads and trails during the period xx/xx to xx/xx."

- Management Area 5.43 Elk habitat, page 3-65. The dates under the second WILDLIFE guideline need to be redone: (Might also use WRIS dates).

Calving----------May 15 to July 1
Migration--fall-------November 15 to December 30
Migration--spring-----April 1 to June 1
Winter----------OK as given
Summer----------OK as given

There should be Standards written for this Management Area.

- Management Area 5.45 Forest Carnivores, page 3-67 & 3-68. There are no WILDLIFE Standards or Guidelines in what is clearly a management area set aside for wildlife.

Proposed, threatened, endangered and sensitive spp., pg. 2-15 Guidelines #5, #13, #14- should become STANDARDS.

Wildlife, page 2-18, 2-19, Guideline #1 should be a STANDARD.

Administrative, Page 2-31 and 2-32, Guideline #1 and #4 should be STANDARDS.

Code 1.13, page 3-8 & 3-8 Semi-primitive wilderness, guideline #4, would restrict hunting access and restrict the opportunity to harvest big game within wilderness areas.

Code 5.4, page 3-57 and 3-58, there are no guidelines or standards for terrestrial wildlife. There should be standards for minimum-security habitat; road density should be no greater than 1 mile of road per square of habitat.

Code 5.41, page 3-59, Theme; should include a statement that conflicts will be resolved in favor of wildlife.

Guideline for Wildlife page 3-60 #1 & #2 should be standards. Should include a Standard for closure periods to protect deer and elk on the winter range. Generally from 12/1 to 5/1.

W11890

Guideline for Recreation page 3-60 #1 should be a standard.
Guideline for Special Uses page 3-61 #1 should be a standard.

Code 5.42, page 3-62, Theme; should include a statement that conflicts will be resolved in favor of wildlife.

Recreation Guideline #1 this should be a standard. There should be a standard under wildlife that allows for the closure of winter range and lambing areas where needed, generally 12/1 to 5/1 for winter range, and 5/1 to 6/15 for lambing.

Code 5.43, page 3-64 & 3-65, Theme; should include a statement that conflicts will be resolved in favor of wildlife.

Wildlife guidelines #1 and #2 should be standards. Dates for elk calving should be changed to May 1 to July 1; winter dates should be changed to December 1 to May 1. Infrastructure guideline #1 should be a standard.

Code 5.45, Page 3-66 to 3-68, Theme; should include a statement that conflicts will be resolved in favor of wildlife.

Recreation guidelines #1 and #2 should be standards.

Infrastructure Standards #2, open travelway density should be changed to not exceed ½ mile per square mile.

Infrastructure Guideline #1 should be changed to a STANDARD.

Code 8.31 page 3-80, Desired condition, last sentence should be changed to read, Operation plans for aerial transportation systems **will** be compatible with the management areas they cross.

STANDARDS for wildlife should be added, aerial transportation corridors will not conflict with the land prescription they cross.

That motorized access from private roads onto the forest will not be allowed should be a standard rather than a guideline. There is no reason for the FS to allow exclusive motorized access. If the FS or a permittee needs motorized administrative access then this can be allowed with restrictions.

Corrections:

Page 3-202 & 203, Figure 3-14 and Table 3-55 uses the HEI model to evaluate elk habitat effectiveness. We question too much reliance on the HEI model. The model has not been updated and lacks the current information out there on impacts from recreation. Also the model was development before the current methods of recreation were in existence. The model may provide a small amount of guidance but it is not worthy of blind faith.

Page 3-203, has the wrong RVD's numbers on it also. Someone needs to check the dollar figures also.

Page 3-205,Draft EIS, Big Game RVD's, the report state RVD's were 257,000 for the White River. In adding up the information from Table 3-57 you get 367,424 RVD's (E15 RVD are wrong it should be 23,765). This is just for elk. Deer RVD for deer hunting in the White River total 206,003. This brings the total RVD for only deer and elk (not counting sheep, goat, bear, lion, moose, small game, and waterfowl) to **573,427**, which are double the reported figures in the document. All figures are from the CDOW 1997 big game harvest.

Page 3-210 Table 3-53 acres dedicated for elk management the standards and guidelines for 5.4 should not be considered to favor elk. Terrestrial wildlife is not even mentioned in the Standards and guidelines. Including this as a prescription that favors elk is incorrect.

Page 3-484, Table 3-158 & page 45 in the Summary of the DEIS; Jobs related to wildlife are shown as 45. There are more than 45 employees with the CDOW within the White River. There are more than 45 fishing guides in Eagle County. Not sure where they are getting this number but it is incorrect. No discussion on how they break out recreation that does both wildlife and other forms (i.e. river rafting for bird watching).

Page 24 Summary of the DEIS; next to the last paragraph, states the largest number of RVD's is expected in Alternative F, then E, B, C, D. The season dates, cost of licenses, limited permits, and success rates are going to impact the RVD's more than the Alternative chosen. Increased roads do not always improve hunting. Washington and Oregon states have been closing roads during hunting season and getting increased success and better quality hunting from the roads being closed. Too many roads can result in hunter crowding, elk moving to private lands, and poor quality experience.

Page 25 summary of the DEIS, Aquatic resources, recreational fishing opportunity is not improved by adding amenities. The stocking rate, catch per man hour, average fish size and the tackle restrictions have more to do with increasing fishing opportunity than amenities.

Appendix N

Page 124, Boreal Owl: Distribution, the Boreal Owl was located in CAT III and in Northeast Bowl by Rick Thompson and Dr. Bill Alldredge. The calls from Boreal Owls have been reported in the Red Sandstone area and in the upper Homestake Drainage.

Page 155, White-faced Ibis; distribution, In the early 1980's White-faced Ibis were seen several times at the Minturn horse pasture in the spring. Three White-faced Ibis were seen in Camp Hale on 042099, 52 White-faced Ibis were seen on 050799 in Lake Creek 1 mile from the USFS boundary.

Page 190, Boreal Toads; distribution. breeding population in the East Lake Creek area status active, breeding population in the Holy Cross City area has been inactive for at least the last year.

W11890

Specific Comments By Ranger District

Aspen Ranger District

1. Trail 1959.1 – ends up at Connie Harvey's at Johnny Draw (T9S, R86W, Sec. 33). There is no through access.
2. Trail 1962.1N – there is no legal access with Child, only a verbal agreement with Child for access up past the Sharp cabin.
3. Roads up at Koby Park need to be looked at. We estimate that approximately 75% of roads shown have already been closed and revegetated by the USFS. Some roads show closed which should be open during hunting seasons. Please see attached map.
4. Add or note bighorn sheep range at the Iron Mine – Pearl Pass area. Consider 5.42 management prescription to overlap with Gunnison National Forest.

Blanco Ranger District

The Blanco Ranger District of the White River National Forest produces wildlife and wildlife related recreation values of statewide importance. The Blanco District is considerably different in land use and the importance of wildlife than other ranger districts within the forest. These comments may not apply equally well to other ranger districts. The Blanco District, including the Flattops Wilderness, provides calving, summer, and some winter range for the largest elk herd in Colorado, estimated at approximately 43,000 animals. The District also provides important summer range and some winter range for the Piceance Basin and other mule deer herds. The Piceance Basin deer herd has historically been the largest migratory deer herd in the world. Bighorn sheep occupy the South Fork drainage throughout the year. The District also provides habitat for an untold wealth of nongame species of mammals, birds, amphibians and fish. Portions of the District may provide adequate habitat for Canada lynx and wolverine, though neither of these species is a focus in any of the alternatives on the Blanco District. Boreal toads, listed under the Endangered Species Act, are found in the Flattops Wilderness and elsewhere on the forest. Colorado River cutthroat trout, recently

petitioned for listing, occur in many headwater streams on the District. Stocked trout of other species provide angling opportunities in many other lakes and streams within the District. In short, the Blanco District provides important and often critical habitat for a wide variety of wildlife, including several economically important species and several threatened or endangered species.

This wildlife is a cornerstone of the economy of the White River valley, including the town of Meeker. Elk and deer hunting on the Blanco District and on surrounding private lands provides a major portion of the annual income for many private landowners, outfitters and guides, and local merchants. The summer and, to some extent, winter habitats provided by the Blanco District are fundamentally important to the maintenance of this economy and the herds of big game on which it is built.

Alternative D is beneficial for wildlife of many species. It represents a significant improvement in management of wildlife habitats for a variety of species when compared to the existing management program (Alternative B). Under Alternative D, much of the upper White River drainage will be managed to enhance wildlife habitat. Important benefits of this alternative are:

1. an expansion of the amount of deer and elk winter range protected,
2. increased protection of important elk calving and other seasonal elk ranges in the Lost Park area,
3. increased focus on management of bighorn sheep range in the South Fork drainage, and
4. Continued attention to Colorado River cutthroat trout management. The Upper White River and adjacent Williams Fork of the Yampa (Routt N. F.) contain the largest concentration of Colorado River cutthroat trout "A strain" streams in northwestern Colorado.
5. Alternative D also provides habitat for many other species of wildlife. It can be expected to lead to improved riparian condition in many streams to the benefit of fish, amphibians, and other wildlife. Alternative D recognizes the importance of providing all age classes of vegetation, including mature and old growth forests, for wildlife habitat.

CDOW Priority Issues:

1. **Travel Management:** Aggressively maintain motorized vehicle restrictions to minimize elk movements to refuge areas and private lands to facilitate harvest and reduce game damage conflicts. Restrict motorized vehicles to designated roads across the Ranger District.
2. **Maintain Lost Park Elk Habitat focus and Coordinated Resource Management (CRM).**

W11890

3. **Continue To Improve Colorado River Cutthroat Trout Habitat** and population performance to prevent or preclude listing under the Endangered Species Act.
4. **Close Park Creek Allotment** and manage for bighorn sheep habitat.
5. **Manage Bar HL Park/Coulter Mesa** timber cuts to be neutral or beneficial to wildlife.
6. **Manage Wilson Park Timber Cuts** to be neutral or beneficial to wildlife.
7. **Enforce and re-evaluate outfitter camp spacing.**

1. Travel Management: One of the most important components of Alternative D is the proposal to move from open motorized and mechanized travel classifications to a restriction of both vehicle types to designated trails only. CDOW strongly supports this change in motorized vehicle regulation across the Blanco District. CDOW has identified several problems with the current vehicle management scheme, which Alternative D will help correct.

1. Many temporary roads have been created pursuant to logging activities on Bar HL Mesa south of the White River. Although these roads were officially closed after the completion of logging, the open designation of the surrounding land made the closures impossible to enforce. The result has been a proliferation of new roads that were never intended for public use.
2. CDOW radio telemetry studies have shown an accelerated rate of elk movement off the forest onto adjacent private lands since 1992. This movement occurs early in the fall as hunting and other recreational traffic increases. Much of this increased traffic is ATV and other off-road vehicle use. The early movement of elk caused by this traffic has greatly reduced public hunting success on public lands, resulting in a growing elk herd that is becoming increasingly difficult to control. Elk move early onto private lands and then tend to stay after the hunting seasons, increasing conflicts between private landowners and elk. These problems occur both north and south of the White River, but are particularly troublesome on the north side.
3. Alternative D sets road densities based on the wildlife habitat prescription in many areas. This is expected to increase management flexibility and minimize road conflicts with wildlife and wildlife habitat.

Natural resource management has reached a point where the old "drive anywhere" philosophy has become untenable. Under Alternative D, the Blanco District will maintain substantial vehicular road access to and across most of the forest. ATV's and other vehicles can be widely used while reducing the impacts of those vehicles on other users and on the forest's resources by restricting them to designated roads. Fall seasonal motorized road closures, where appropriate, should begin by the first of September to have the greatest effect on early elk movements. CDOW recommends that local CDOW and USFS personnel meet to make joint recommendations on the specifics of road openings and closings on the Blanco District. CDOW would prefer to have some flexibility in road opening and closing as conditions change through the life of the forest plan, rather than having all individual road closures stipulated in the plan.

2. Maintain Lost Park Elk Habitat focus and Coordinated Resource Management (CRM). CDOW has a long-standing investment in elk habitat management in Lost Park and has actively participated in Coordinated Resource Management efforts involving Lost Park. Oak Ridge State Wildlife Area is a part of this effort; the Lost Park permittee's cattle graze on Oak Ridge in late spring/early summer in order to allow grass to re-grow after heavy use by elk in the calving season. Lost Park provides very important calving habitat. CDOW feels strongly that the management focus on elk habitat and the CRM effort should remain in place regardless of the alternative selected.

3. Continue To Improve Colorado River Cutthroat Trout Habitat. Lost Creek and Hahn Creek in Lost Park are home to one of the few "A-strain" Colorado River cutthroat trout populations in the White River basin. Riparian condition deteriorated prior to the start of the CRM process, but has recovered sufficiently since the Cooperative Management Plan was implemented to maintain the fishery. This progress needs to continue to ensure the long-term viability of this cutthroat trout fishery. This population will be key in the analysis of whether Colorado River cutthroat trout should be listed under the Endangered Species Act in Colorado. CDOW believes that riparian condition would decline to the point that this population could be at risk under more liberal travel management proposed in other alternatives.

4. Close Park Creek Allotment: CDOW strongly supports the permanent closure of the Park Creek Grazing Allotment (Vacant Allotment 10) in the Blanco Ranger District. This sheep and goat allotment contains much of the annual range of the South Fork bighorn sheep herd. Domestic sheep within 5 miles of a herd of bighorn sheep have been shown to be detrimental to the long-term survival of bighorn sheep. Closure of this allotment would also preserve important bighorn forage in Park Creek, Lost Solar Creek and on the Bloomfield Bench, an area of significant bighorn concentration. This allotment has not been used for many years, as it involves long trailing across neighboring allotments and other livestock management problems. It is recommended for closure in 4 of the 6 alternatives. CDOW also recommends that all other allotments within five miles of the range of the South Fork bighorn sheep population, remain in cattle production and not be allowed to change class of use to domestic sheep.

5. Timber Management, Bar HL Park/Coulter Mesa: There has been an extensive aspen clear cutting program between Meeker and Rifle. The actual size of these cuts and the quantity of the cutting units are much greater than originally proposed. Recent (1999) examination of three to five year old cuts clearly show a lack of suckering or aspen regeneration except near the cut borders of old growth trees. We need to know if cattle/elk grazing is the cause or for what other reason the desired regeneration goals are not being reached. We are concerned that Forest Service is removing too much aspen, too quickly without really knowing what the long term net result will be. We recommend that aspen sales in the Rifle/Blanco districts be drastically reduced to allow time for comprehensive studies. The White River Forest has stated on record that the Bar HL Unit has less big game hiding cover than suggested by Forest Plan standards and guidelines. We are having great difficulty maintaining elk and deer on the forest through the fall months now. The lack of heavy regeneration in aspen sales will only promote

W11890

more big game migration on to private lands, causing reduced harvest and a growing game damage problem on private lands.

CDOW also recommends that conifer harvest on Bar HL Park/Coulter Mesa be reduced. Coniferous timber in this area has been cut under the existing forest plan to the extent that habitat value for wildlife (particularly big game) is declining.

6. Manage Wilson Park Timber Cuts to be neutral or beneficial to wildlife: Impacts to wildlife resulting from the size, location, and timing of timber management actions conducted under Alternative D be considered and minimized in the Wilson Park area.

7. Outfitters: CDOW has received numerous complaints from hunters in recent years concerning the number and density of outfitters operating on the forest. Location of outfitter camps in preferred sites has also been a concern. Complaints have come from both north and south of the White River but have been far more numerous south of the river. While outfitters provide a valuable service on forest lands, they are often in direct competition with other public users. CDOW recommends that the USFS enforce spatial separations between outfitter camps and evaluate expanding the distance between camps from ½ mile to ¾ mile, at least in sensitive locations.

Dillon Ranger District

SUMMIT COUNTY-WIDE COMMENTS

WINTER RANGE
One of the most critical components of habitat for deer and elk is winter range. This is especially true in the high elevations of Summit County. It is very important that these areas continue to be a high priority for protection. In addition, some winter range contains valuable sage grouse habitat that is also protected by protecting deer and elk winter range. Any alternative or combination of alternatives selected should recognize these important areas and protect them to the highest degree possible.

MIGRATION, MOVEMENT CORRIDORS
In areas where known movement corridors or migrations routes exist for various species of wildlife, a high priority must be placed within the National Forest to maintain the effectiveness of the routes across drainages, highways, political and governmental boundaries, and other obstacles. Diminishing the function of the corridors should be avoided.

WATER QUALITY
Water quality is a major concern in Summit County. Summit County contains the headwaters of the Blue River, which leads to the Colorado River. Portions of the Blue River have been designated as Gold Medal Water, with high economic, biological, aesthetic, and social value to the community. Dillon Reservoir and Green Mountain Reservoir are also along the Blue River and provide drinking water and recreation for thousands of people each year. Thus, it is critical

that management practices strive to maintain the highest water quality possible in the Dillon Ranger District.

VEGETATION MANAGEMENT

In Summit County several issues need to be considered carefully if an Aaggressive timber management policy≅ is in place as proposed in Alternative D. First, as mentioned above, water quality will be a primary concern in any areas where timber management is proposed. Second, local, state, and federal agencies have made significant progress in protecting wetland and riparian areas in the county. Aggressive timber management should not reverse the direction already taken by all of the local governments and agencies.

Third, timber management should continue to target habitat improvement for multiple species, and while elk will be one of the primary beneficiaries, other species should benefit as well.

Finally, large stands of mature lodgepole pine exist in the county that need to be converted from large, decadent stands which provide little habitat for few species to more diverse age stands of lodgepole pine, aspen, willow, and other conifer trees to increase populations and diversity of species of wildlife. The selection of sites needs to be carefully scrutinized by the USFS, state and federal agencies, and local governments.

LOWER BLUE BASIN (roughly the area north of I 70)

WILDLIFE AND WILDLIFE HABITAT VALUE

The Lower Blue Basin extends from an elevation of about 8,000 feet to about 13,000 feet above sea level. This is about 1,000 feet lower than any of the other basins in Summit County. The lower elevation allows for marked differences in vegetation and therefore, diverse wildlife habitats. The Lower Blue Basin supports the largest and most diverse populations of wildlife in Summit County, and as such, demands the greatest protection. The Forest Service has protected much of the Lower Blue through the only two wilderness areas (the Eagles Nest and Ptarmigan Wilderness Areas) in the county. These two wilderness areas protect a large portion of the basin, so there are fewer issues concerning management of Forest Service lands than in other parts of the county. Our comments will focus on the Forest Service lands outside of the wilderness boundaries. The Lower Blue Basin also has the largest undeveloped tracts of private property in Summit County, which may potentially negatively impact Forest Service lands. Summit County and the Lower Blue Planning Commission specifically, have been working toward preserving the rural characteristics of the Lower Blue and minimizing impacts to wildlife habitats on public and private property. These efforts need to be supported and continued by state and federal agencies.

LAND MANAGEMENT PRESCRIPTIONS

–The area west of Green Mountain Reservoir is designated as 5.4 and 5.45. The 5.4 area designation should be extended further south to allow for a road system that was created as part of a joint effort between the local Ranger District, the BLM, and the DOW. This system has been working to protect wildlife and wildlife habitat. and the 5.45 designation would provide a buffer between the wilderness area and the motorized area. The area west of Sheep Mountain is not in the Dillon Ranger District or Summit County, but is in Bob Thompson=s district. The land management prescriptions in this area are appropriate under Alternative D or under Alternative C.

–The area at the top of the Williams Peak range is currently 5.4 under Alternative D and could remain as 5.4, but because of elk and deer use in the area would be more appropriate to be designated 5.43 or 5.41.

–On the west side of the Blue River, much of the previously prescribed land (under Alternative B) between Boulder Creek and Cataract Creek was 5.41 and under Alternative D has been converted to 5.43. The Division has worked with private landowners and the Forest Service in the area to protect and enhance the area for wintering elk. The 5.41 designation is the most appropriate prescription for the area.

W11890

–In the area, a travel management prescription on Brush Creek has been changed to allow motorized travel year round, including snowmobiles in the winter. The area is poor for snowmobiling since routes lead to dead ends that lead to the wilderness or to private land (the small National Forest area is surrounded by private land and wilderness). Containing snowmobilers to designated routes in the area may be nearly impossible. The area also provides important winter range for elk to move to prevent damage to crops for landowners. The road should not be open to snowmobile use.

–The area south of Wildernest and Mesa Cortina contains unique wildlife habitats for many species. Over the years, the area has also developed many social hiking and biking trails. A cooperative effort has been initiated between the Ranger District, the county, the DOW, and local interest groups. This effort should be allowed to continue to develop appropriate trails that provide recreation while protecting the wildlife and wildlife habitat.

UPPER BLUE BASIN (roughly the area south of Dillon Reservoir, the east half of the Ten Mile Range to the Continental Divide)

The Division of Wildlife has been conducting a study of radio-collared elk in the area north of Breckenridge and between HWY 6 and Tiger Road. This study has shown that elk are using these areas extensively during most of the year. These areas are critical for several reasons including calving, winter range, and regular movement and seasonal migration corridors. The management prescriptions allow for a number of recreational activities while maintaining the emphasis on elk management.

LAND MANAGEMENT PRESCRIPTIONS

–The area near Georgia Pass should be included in the 5.45 designation since much of the private land was traded to provide such protection and the studies by the Forest Service, the USFWS, and the Division have shown the pass to be especially important for elk and lynx and a variety of other species in the area.

–The area between Ophir Mountain and the Whatley Ranch is used extensively by elk wintering in the area and would be best protected by the 5.41 prescription.

SNAKE RIVER BASIN (roughly the area south of I 70, east of Dillon, and north of Tiger Road)

The major issues in this basin have been centered around the geographic and vegetative characteristics that provide movement for a wide variety of species to move north and south on the east side of Keystone. This corridor has been reduced by the development that has occurred from Dillon Reservoir to Jones Gulch. The Division, the Forest Service, Summit County, and the Fish and Wildlife Service have been trying to assess the importance of the corridor in relation to lynx, elk, deer, black bear, moose, and other species. Thus far, the consensus has been that this corridor is extremely important and should be preserved. The agencies are currently trying to determine what activity and development is appropriate in the corridor, and have not yet reached any conclusions. The corridor should be managed very conservatively until information gathered shows otherwise.

LAND MANAGEMENT PRESCRIPTIONS

–The 3.55 prescription may be appropriate east and south of Keystone, but the 5.45 prescription is most appropriate.

–The Tenderfoot Mountain area is currently designated 5.43 and 5.45. If snowmobile recreation is managed carefully and roads appropriately managed, the 5.43 prescription may be substituted for the 5.45 prescription. The more appropriate prescription for lower Tenderfoot Mountain is 5.41 because of the critical nature of the winter range in the area and in the Soda Creek drainage

(the area above Summit Cove). The other areas outside of the 5.41 designation in the Swan Mountain area are consistent in management with a prescription of 5.43.
--The Montezuma area is currently 4.32, but is surrounded by prescriptions such as 3.21 and 5.45 which indicate a low level of impacts. The 4.3 prescription would be more appropriate in this area (rather than 4.32).

TEN MILE BASIN (roughly the area south of Frisco, west of the top of the Ten Mile range to the county line)

This area contains two important movement corridors that allow wildlife to move north and south across I 70. The bridges that cross the drainages on the east side of Vail Pass provide the best opportunity for wildlife to cross the interstate safely. The area is used heavily by elk, deer, and various carnivores, and is considered a high quality habitat for dispersing and settled lynx.
LAND MANAGEMENT PRESCRIPTIONS
--The top of Vail Pass is currently a special fee area in the winter for snowmobiles. Much work has gone into developing the site for this type of recreation. The site attracts high numbers of users and concentrates them in one area. The area is not without its problems-containing snowmobilers continues as an issue, but if the top of Vail Pass were prescribed as 5.43 or 5.4 with designated routes and play areas, the rest of the area currently prescribed 5.45 (between Copper Mountain and Vail Pass) could function effectively for forest carnivores, elk and mule deer. Part of the issue is limiting the number of users, most likely through parking lot size, to limit the number of snowmobilers in the area. The area should also be closed to all use from 6:00 p.m. to 7:00 a.m. from November through April.
--The area between Climax and Copper Mountain is currently designated as 4.3. This area is near timberline, and provides forest connectivity between Camp Hale and the Ten-Mile Range. The 5.43 or 5.45 prescription would better protect the area for ungulates and forest carnivores.

Eagle Ranger District

Travel Management

Winter Travel

1) Close utility corridors to the south and west of Gypsum Cr. These corridors contain deer and elk winter range and don't go anywhere except into other closed areas.
2) Close the areas to the north and west of Adam Mountain. These areas contain deer and elk winter range and are inaccessible to snowmobiles anyway.
3) Open the area to motorized winter use in the Metheny Park, Bumpity Park, Big Park, and Granite Spgs. These areas don't have any wildlife conflicts and contain some very good powder meadows the snowmobilers really like. If nothing else open designated routes so the sleds can get to these important play areas. If areas like these aren't available to snowmobilers they will go to other areas where there will be true conflicts with wildlife.
4) Open a designated route for winter motorized vehicles on the main Hardscrabble Road from Wolverton Spring to the road going over the top of Hardscrabble and connecting with the powerline road connecting Gypsum Cr. and Brush Cr. Without this designated route snowmobilers will be restricted from coming onto the forest and will stay on the lower elevation BLM lands where there will be significant impacts to wintering wildlife.

W11890

Summer Travel-the following changes are recommended for the travel management strategy:

The Season of Restriction dates used in the management strategies does not provide good dates for elk calving areas. Those dates should be May 1 to July 1.

ROADS--

FDR 413.2 Change travel management strategy to **64**
FDR 413.2A Change travel management strategy to **64**
FDR 413.2B Change travel management strategy to **64**
FDR 413.2D Change travel management strategy to **64**
FDR 413.2X Change travel management strategy to **64**
FDR 413.2Y Change travel management strategy to **64**
FDR 413.2Z Change travel management strategy to **64**
FDR 414.1 Change travel management strategy to **1**
FDR 414.1A Change travel management strategy to **64**
FDR 414.1C Change travel management strategy to **64**
FDR 417.1 Change travel management strategy to **1**
FDR 421.1 Close road at Sink Park
FDR 421.1F Change travel management strategy to **1**
FDR 425.1B Change travel management strategy to **64**
FDR 428.1 Change travel management strategy to **1,17** and with an elk calving season of restriction May 1-July 1
FDR 430.1B Change travel management strategy to **1** and with an elk calving season of restriction May 1-July 1
FDR 430.1C Change travel management strategy to **1** and with an elk calving season of restriction May 1-July 1
FDR 430.1D Change travel management strategy to **17**
FDR 430.1E Change travel management strategy to **1,17** and with an elk calving season of restriction May 1-July 1
FDR 431.1 Change travel management strategy to **1**
FDR 431.1L Change travel management strategy to **1**
FDR 432.1 Change travel management strategy to **1**
FDR 433.1 Change travel management strategy to **1** and with an elk calving season of restriction May 1-July 1
FDR 435.1 Keep a **1** but close below Lettuce Patch Spring
FDR 435.1C Change travel management strategy to **1** and close at west end of Metheny Park where it's closed presently
FDR 441.1 Change travel management strategy to **64**
FDR 451.1 Change travel management strategy to **1**
FDR 451.1A Change travel management strategy to **1**
FDR 452.1 Change travel management strategy to **64**
FDR 453.1 Change travel management strategy to **64**
FDR 453.1A Change travel management strategy to **64**
FDR 455.1 Change travel management strategy to **1**

FDR 456.1 Change travel management strategy to **64**
FDR 457.1 Change travel management strategy to **64**
FDR 464.2 Change travel management strategy to **1**
FDR 468.1 Change travel management strategy to **64**
FDR 514.2 Change travel management strategy to **1 only**
FDR 618. Closure of 618 at the "Big Pasture" turnoff to motorized vehicles would improve deer and elk hunting below the rim (dropping into Sweetwater) and would protect elk calving and deer fawning areas from disturbance. Alternative D mentions a closure but does not specify where.

TRAILS—
FDT 1869.1 Change travel management strategy to **56**
FDT 1869.1H Change travel management strategy to **64**
FDT 1870.1 Change travel management strategy to **40**
FDT 1871.1 Change travel management strategy to **64**
FDT 1871.1C Change travel management strategy to **64**
FDT 1872.1 Change travel management strategy to **56** with dates changed to protect elk calving, May 1-July 1
FDT 1878.1 Change travel management strategy to **56** with dates changed to protect elk calving, May 1-July 1
FDT 2224.1 Change travel management strategy to **56** with dates changed to protect elk calving, May 1-July 1

WAYS— Open one of the following two Ways as they parallel each other and change the travel management strategy to a **17**.
WAY 464W.2N
WAY 464W.3
All the remaining Ways on the Eagle Ranger District, (south side of District), should be permanently and physically closed. These Ways do not go anywhere, and for the most part are very short. If they are left open they will encourage illegal use into areas that are closed.

Management Prescriptions (see map)

1) Gypsum Cr. 5.45, Forest Carnivore, area should be expanded to go to the top of the Red Tables. The present area is too small with no real linkage to other 5.45 areas. This same area should be expanded to the southeast where it is currently a 5.4. The area comprising Campbell Cr., Lost Lake and Leeman Lakes is good lynx habitat. The present area between the existing 5.45 area and the utility corridor to the east should also be expanded to a 5.45 classification.

2) The small areas on the west and north sides of Adam Mtn. should be reclassified to a 5.45 or a 5.41. The current classification is for areas that are critical wildlife habitat for deer and elk (production, breeding, rearing, wintering and movement). The current classification also allows for motorized use in winter-which is obviously a conflict.

W11890

3) The 5.45 area on Hardscrabble Mtn ranging from the forest boundary to the southeast should be changed to a 5.43. The present area designation is to small w/o any linkage to other 5.45 areas and doesn't really have the physical attributes the other 5.45 areas do.

4) It is good to see the prescription maps in Alternative D address the bighorn sheep habitat areas. Most areas seem accurate, however the bighorn habitat prescription north of Deep Cr. Canyon should extend further upstream to include the rim and adjacent habitat up to Sams Spring. Alternative D does not adequately map the deer and elk winter range north of Glenwood canyon. The map in Alternative B seems to be more accurate, especially on the west end of the canyon. This needs to be addressed in order to provide adequate protection from disturbance during the winter months.

On a smaller geographic basis, the area of the White River incorporated in the Eagle North district, there are very few issues that are not addressed in Alternative D. The closure of roads does not have much impact in this area due to the very limited motorized access routes now available. Basically, there are three motorized routes that access the forest in this area. All three routes are "4-wheel' drive accessible only. These routes do not have spur roads and reach singular destinations. All three are heavily utilized during the hunting season and for summer recreation. Closing these roads would have benefits; fewer impacts on habitat, probable increased success in harvest but would have an impact on customers that rely on motorized access to reach their hunting destination. We would recommend that USFS roads 613 and 616 both accesses to South Derby Creek, 610 and 612 Stump Park and Middle Derby Creek access, and 615 Sunnyside access remain open. Although there are only three accesses into the forest , road 616 and 612 are spurs off main access roads 610 and 613 and do allow dispersal of hunting/human pressure. These roads have undergone discussion and public comment for closure prior to this forest plan and comments were greatly in favor of the roads remaining open to motorized access.

The greatest impact we see in this area is the huge increase in numbers of summer recreation users in the wilderness area. This has caused a drastic change in movement patterns and areas of use by wildlife. Traditional calving areas have been deserted because of a loss of solitude, elk are now spending a majority of the year on private property adjacent to the forest because there is less impact from humans, movement patterns and migration times have been effected. Closing the roads we have suggested remain open above would have an impact on the amount of summer use but there has been a dramatic increase in horse and backpack use into former "solitude" areas. This is a greater impact on wildlife. Road closures would decrease amount of use but the majority of motorized users do not venture far off the road limiting their impact. There is an increase in the amount of summer outfitting in the area. We think a use permit system in many areas of the forest should be considered or seasonal closures of critical wildlife areas.

Rifle Ranger District

Travel Management

Winter Travel Management – Prefer Alternative D.
Maps need revision, not all routes are marked, SP routes are not all designated

Road 2160.4 (Beaver Cr. Road unit 42) shows on the travel management map but not in the Road and Trail listing appendix O. This has been a historic access to the National forest. Its omission from the database needs to be resolved.

Road 845.2 (Spruce Cr. Rd) shows on the travel map but not in the Road and Trail listing appendix O. Its omission from the database needs to be resolved

Roads 275.1W and 847.1 have the correct coding and restrictions to benefit wildlife and to facilitate people's ability to enjoy the forest.

Trails 1902.1 and 2160.6 should not have code 69 (page O-46 @O-47) applied to it because this would preclude hiking and horseback on this trail. These are uses that are presently occurring and should not be precluded. A restriction on foot and horseback use of the trails would negatively impact hunter success and GMU 42 harvest objectives.

Trails 1903.1, 2160.1, 2160.5, 2160.6A, 814010.1 and 814010.1A all have the correct prescriptions to benefit wildlife and to facilitate people's ability to enjoy the forest.

Road closures have always been a problem in Game Management Unit 33. We recommend that only those USFS roads that are numbered on their present map remain open. This would close a large number of illegal roads. The White River Forest needs to vastly improve their travel plan and they also need to greatly expand their law enforcement efforts. Education of the public will not stop or even significantly reduce illegal motor vehicle use.

Timber Suitability- See Comments regarding Bar HL/Coulter under Rio Blanco District

Management Prescriptions

- Removal of Management area prescription 8.25 will benefit wildlife both on private and public lands.
- The inclusion of the west half of the Battlements into a Research Natural Area, prescription 2.2, is strongly supported for the protection of this unique ecosystem and the biological diversity of the area including the endemic Bighorn sheep population (page D-40).
- The inclusion of prescription 1.31 to the upper part of the Battlements helps maintain summer solitude, disperses hunting pressure, and is a benefit to the established outfitters on the Forest
- Prescription 3.31 highlights the access work that was cooperatively accomplished by the Rifle district and the CDOW to provide access to the Battlement reservoirs and ultimately in securing funding (Fishing is Fun) to restore the cutthroat trout fisheries in the reservoirs.
- Prescriptions 5.41 and 5.43 will help manage deer and elk in this half GMU 42. The prescriptions allow the continued cooperation with the Rocky Mountain Elk Foundation, USFS, private industry, and CDOW to actively manage the forest for the benefit of people and wildlife.
- The CDOW should support the closure of Cattle and Sheep Allotment 40 to support the RNA prescription and to protect the endemic Bighorn population.

W11890

Holy Cross District

Travel Management

Travel Management Winter:
These recommendations pertain to Alternative D but could be used in any Alternative. The accompanying map provides additions and deletions for winter travel and snow play areas. The numbers correspond to the numbers on the map.

1) The area within the roads across Red and White Mtn. should be listed as G. There should be little wildlife impact from recreation in this area during the winter. Big game species have moved down for the winter. It is these lower areas that need the protection from winter recreation.

   Holy Cross City, this area should be shown as G. Big game species have moved down for the winter.

   Both of these areas provide some suitable habitat for lynx and snowshoe hares but neither provides the optimum habitat. The surrounding areas that have limited uses provide better habitat and movement corridors.
2) Ptarmigan Pass is one area that contains open alpine bowls. Due to deep snow and/or lack of cover these bowls have limited wildlife values in the winter. This and other areas similar to it should be open for all forms of winter recreation
3) Grouse Creek: the open meadow on the lower 2/3 thirds of this area should be shown as G. Due to deep snow and/or lack of cover this open area has limited wildlife values in the winter.

4) Parcel south of Edwards, this should be listed B, closed to motorized travel. There is no legal motorized access to this parcel; further, it is listed as winter range for deer and elk, and the two prescriptions would be in conflict with each other.

Travel Management Summer:

Hunters are concerned were concerned that they would not be able to have vehicular access to locations over McCord Pass to hunt drainages such as Bear Gulch, Grape Creek, Lava Creek, Box Canyon Creek, Aspen Creek and Castle Creek. These areas are accessed by USFS Roads 404, 442, 445 over McCord Pass from the Sheephorn drainage side. Also USFS Road 449 is accessed over the High Trail Gulch saddle from Cottonwood Mesa Springs Road (I believe USFS Rd 444) to access the Castle Creek and High Trail Gulch drainage's. None of these roads would be open under alternative D of the plan.

These roads are the only access by vehicle to the backside of Piney Ridge. Our concern is that if we close down all vehicle access, then we will not be able to receive an adequate harvest on the elk herd in that area. The elk tend to bounce back and forth between the Sheephorn side and the Piney River side. We believe if we close off all access to the Piney River side, that the elk will just move from the Sheephorn side during hunting seasons and for the most part be untouchable to most of the hunting public.

These roads are extremely rugged and are only for the die-hard four wheelers or ATV'ers. This in itself limits a lot of hunters from hunting this area. CDOW would prefer to keep these roads very primitive. This is not to say that there is some abuse going on with users creating and using new ATV trails in the area. This needs to get more USFS law enforcement attention to help curb this problem.

By leaving a couple of these vehicular access routes over Piney Ridge to the Piney River side will not be detrimental to the forest mammals, fish and avian species found in that area. In general, the least amount of roads in an area is preferred, for the benefit of wildlife. However, this occasionally needs to be balanced with access to allow for increased recreational opportunities for the public and allow the CDOW to better harvest a burgeoning elk herd.

This chart is from Appendix O Pages O-30 to O-39, using Alternative D. The specifics for the roads and trails could be used in any alternative. The number beside the road/trail corresponds to the Travel Management Strategies as listed in appendix O.

Many of these roads and trails need to be cross-checked with the EIS and EA completed for the ski areas and other projects, which contain specific wildlife mitigation such as seasonal closures. These closures include foot and horse.

If the seasonal closures are for wildlife the road/trail needs to be closed to all users. Calving dates are May 1 to July 1, **not** May 1 to June 20. This would apply to any Code that has a

W11890

closure for elk calving. Closures to protect big game winter range should be comparable with the dates used in the CDOW WRIS mapping. These dates change depending on the location and species. If the change in dates is to confusing, dates that cover at least December 1 to May 1 should be used. These dates would apply to any Code that has closures for protecting big game winter range.

Road/Trail #	Road/trail Name	Code	Comments
FDR 406.1	N/A	1	
FDR 702.1	Resolution	1	
FDR 703.1	Gold Park Campground	1	
FDR 706.1	Peterson Creek	64	
FDR 707.1	Tigiwon	13	Change dates April 1 to July 1
FDR 708.1	McAllister Gulch	1	
FDR 711.5C	Back Bowls *		needs a seasonal closure to comply with CATIII EIS
FDR 711.5E	Sunup Bowl *		needs a seasonal closure to comply with CATIII EIS
FDR 738.1	Beaver Creek	51	
FDR 738.1A	Bottom Lift 10	51	
FDR 738.1B	Lift 9 mid-point	51	
FDR 738.1C	Beano	51	
FDR 738.2a	McCoy Park *		Seasonal closure May 1 to July 1 for elk calving
FDR 738.2B	McCoy Park Spur *		Seasonal closure May 1 to July 1 for elk calving
FDR 738.3A	Top Lift 7	51	
FDR 738.3B	Base Lift 8	51	
FDR 738.3D	Lift 9 mid-point	51	
FDR 739.1	Top Lift 8	51	
FDR 747.1	Wearyman	1	
FDR 748.1	Line Shack *		Closure needs to be from May 1 to July 1 for elk calvir
FDR 749.1	Meadow Mtn *		Closure needs to be from May 1 to July 1 for elk calvir
FDR 755.1	Ranch Creek	1	
FDR 759.1	Holy Cross City	1	
FDT 1881.1	Red Canyon Stock Drive	64	
FDT 1881.1A	East Fork	64	
NRT 2005.1	Two Elk *		Needs to comply with CATIII mitigation May 5 to July closure
FDT 2106.1	Buck Creek	64	
Way 2133W.1	Commando Run *		Needs to comply with CATIII mitigation May 5 to July closure
Way 2348W.1	Whiskey Creek*		Closure needs to be from May 1 to July 1 for elk calvir
Way 2348W.1A	Whiskey Creek *		Closure needs to be from May 1 to July 1 for elk calvir
Way 2349W.1	N/A *		Closure needs to be from May 1 to July 1 for elk calvir
Way 2349W.1A	N/A *		Closure needs to be from May 1 to July 1 for elk calvir

* Need to be checked against EIS or EA for wildlife mitigation.

Management Prescription changes:
With the ever-increasing rate of private land development in the Upper Eagle Valley the protection of big game winter range on public lands should be of highest importance. The standards and guideline for prescriptions that favor wildlife should have a general standard that "conflicts will be decided in favor of wildlife." The USFS should protect the critical habitat under its jurisdiction to provide for the needs of this elk herd. With the constant decrease in agriculture lands the USFS needs to provide for the maintenance and protection of big game winter range on public lands. Such actions would protect public values and assist private lands in preventing additional impacts to private agriculture lands. The Upper Eagle River elk herd is further hampered by the inability to migrate from the area due to I-70, development and deep snow combined with the lack of agriculture lands for winter range off of public lands.

In Alternative C, the area in Booth Creek provides two prescriptions for one area, 1.12 and 5.42. This is an excellent combination. The area is critical bighorn sheep habitat yet it is within the wilderness. This was a CDOW recommendation in the scoping for several areas. This type of resource planning allows for the best opportunities to meet the ever-increasing complex needs of the resource.
The following areas should also have a combination prescription:

Booth Creek (mentioned above), the 5.42 prescription should be drawn the same as in Alternative D, with the combination prescription (1.12, 5.42) continuing to the east to Pitkin Creek.

Homestake Creek, west of the Homestake Road from highway 24 to Missouri Lakes turn off. This should be 1.12 combined with 5.43.
Reason:
This area contains elk winter range, severe winter range, winter concentration area, calving, rearing and summer range. Two different herds use this area. In the winter and spring the Homestake herd winters there. In the summer and fall elk from Redcliff and Minturn area use the area. This area was studied for 6 years to develop the specifics of this movement pattern. With the increasing push for more recreation areas in the winter and spring there needs to be a prescription that can protect such critical habitats.

South of I-70:

McCoy Park: The are two parcels here that are currently shown as 5.4 and 5.41 in Alternative D. They should be changed to 5.43.

Reason:
CDOW and CSU have had elk studies in this area since 1985. The studies have clearly documented the critical importance of this area for elk calving, rearing, summer range and transitional winter range. With the exception of one large private landowner in Lake Creek all other private lands in this area (north and east) have been developed. All

W11890

of the USFS land to the east has been developed as the Beaver Creek ski area. The USFS land to the south is wilderness that does provide summer range but does not provide calving, winter range or transitional winter range. This herd migrates to the Grouse Mountain area in the summer. The increasing development and recreation pressure on the surrounding lands has only increased the value of this parcel to maintain a viable elk herd in the Lake Creek and Grouse Mountain area.

Stone Creek, Whiskey Creek, Dowd Jct. and Two Elk: These areas are currently shown on Alternative D as 5.41. They should be changes to 5.43.

Reason:
The Stone Creek and Whiskey Creek drainages are part of the mitigation for the Beaver Creek ski area. The mitigation plan clearly states that this area is to be managed for elk. The drainage contains calving, rearing, winter range, severe winter range, and winter concentration areas. The surrounding private lands are all developed. This development is putting additional stress on the USFS lands to provide recreation. Increased recreation during winter and spring would have adverse impact on managing the area for elk, as required to meet the Beaver Creek Ski Area Mitigation Plan. Elk studies since 1985 have documented this herd migrates to Vail Pass (south of I-70) and to Grouse Mountain. Activities or developments that would directly or indirectly negatively impact the habitat would have significant adverse impacts on the Upper Eagle River elk population. The ongoing elk studies since 1985 have clearly documented the critical value of this area.

Dowd Jct. and Two Elk areas contain winter range, winter concentration areas, severe winter range, calving, and transitional winter range. Private land that is either developed or being considered for development surrounds this area. To the east is the Vail Ski Area and to the north is I-70. These two developments result in a blockage of migration opportunities for elk to winter elsewhere. The elk study since 1985 has shown this herd to migrate to Homestake Creek, Vail Pass (south of I-70) and Copper Mountain. Activities or developments that would directly or indirectly negatively impact the habitat would have significant adverse impacts on the Upper Eagle River elk population. The ongoing elk studies since 1985 have clearly documented the critical value of this area. As such it should receive the maximum level of protection from activities or developments that would negatively impact or reduce the value of the habitat.

South of Redcliff to Camp Hale east of highway 24: This area is currently shown as 5.4 in Alternative D, it should be changed to 5.41.

Reason:
This area contains elk winter range. To its north is a large piece of private land that has development possibilities. To the south is Camp Hale a heavily used winter recreation area. This area provides winter range for a resident herd of elk. These elk

winter and summer within the greater Camp Hale area. Activities or development that would adversely impact this habitat would result in a decrease or loss of this resident herd.

South of Vail Pass, Searle Pass: This area is currently shown as 4.3 in Alternative D, it should be changed to 5.43.

Reason:

This area contains high quality summer range, calf-rearing habitat. The ongoing elk studies since 1985 have documented the drainages east and south of Vail Pass as critical calf rearing and summer range for elk. The elk using this area come from two different herds, Dowd Jct. and the Ten-Mile area. The just complete final report of the Upper Eagle River Valley Elk Study clearly documents the negative impacts on elk calf survival from uncontrolled recreation. A prescription of 4.3, disperse recreation would have significant adverse impact on the elk habitat. Maintenance and protection of these habitats are critical not only for calf rearing but also for elk to bring optimum fat reserves with them to the winter ranges. The loss of optimum fat reserves would result in decreased winter body conditions. A reduction in winter body condition can result in decreased calf birth weight and decreased milk production by the cow. Such a reduction would result in decrease calf survival.

North of I-70:

East of State Bridge: This area is currently shown as 5.4 in Alternative D, it should be changed to 5.41.

Reason:

This area contain elk winter range, severe winter range, winter concentration area and deer winter range. The surrounding private lands already winter significant numbers of deer and elk. A loss of habitat value from activities or development would result in an increase in the number of deer and elk wintering on the private lands. Prescription 5.4 does not contain any wildlife protection, further this area is mainly shrub and aspen drainages (prescription 5.41) not forested ecosystem. Additionally the standards and guidelines don't mention terrestrial wildlife. Winter range for big game on public lands should receive the highest protection possible with conflicts being decided in favor of wildlife.

Additions to prescription 5.45:

The following additions to prescription 5.45 are to provide connective corridors for migration. Areas provided areas for forest carnivores must include corridors for migration between these habitats. The corridors must contain suitable habitat for the forest carnivores to survive during the migration. Although the prescription maybe stated as forest carnivores the protection of these corridors will benefit all wildlife.

W11890

South of I-70:

West of Redcliff: Peterson Creek is currently shown as 5.4 in Alternative D, it should be changed to 5.45.

Reason:

This area contains excellent foraging and denning habitat for lynx. It provides a connecting corridor from the Holy Cross Wilderness to the Shrine Pass 5.45 prescription. The parcel is located in an excellent location for forest carnivores to cross highway 24 with cover on both sides of the highway. Further this area also has good site distance for drivers to see animals trying to cross the highway thereby enabling the driver to take action to prevent collisions. The prescription 5.4 does not provide any protection to the habitat for forest carnivores. The standards and guidelines do not even mention terrestrial wildlife needs.

West and south of Camp Hale to Tennessee Pass: This area is currently shown as 5.4 in Alternative D, it should be changed to 5.45.

Reason:

This area provides a connection between the two parcels on the east and west side of highway 24. The parcel also provides excellent areas for forest carnivores to cross highway 24, the corridor has good line of sight for drivers and good cover on both sided of the road in many areas. The Mitchell Creek and Bennett Gulch both provide excellent foraging and denning habitat for lynx. The current mapping for Alternative D makes no sense in that the prescription does not continue down and across highway 24. The 5.4 prescription does not provide any protection for migration corridors for forest carnivores. The ability for forest carnivores to be able to successfully cross highways should be of the highest priority.

East of Camp Hale: This area is currently shown as 5.4 in Alternative D, it should be changed to 5.45.

Reason:

This area provides the connection between the two 5.45 prescription areas in Shrine Pass and the East Fork of the Eagle River. This connection then provides a continuous corridor from the west side of Highway 24 to Vail Pass and the Eagle Nest Wilderness area. This would provide a critical corridor between the Frying Pan River Drainage and the Eagle River Drainage. Prescription 5.4 does not provide this type of protection to maintain a safe and effective corridor for forest carnivores to migrate.

Grazing:

For the Holy Cross District, there was an agreement signed by the CDOW and Campbell Hansmire sheep on 03/20/98. This agreement was given to Mr. Wayne Nelson, Range Land Management Specialist. The agreement outlined the adjustment of the sheep

allotments in the Red and White Mountain allotment, north side of the Spring Creek and Berry Creek allotment (Spring Creek and Berry Creek are shown on the Forest Plan mapping as allotments 37 & 38). The north side of Spring Creek and the Berry Creek allotment would be added to the Red and White Mountain allotment (as shown on the map provided to Mr. Nelson). This would be used for spring grazing and fall egress. The east end of the Red and White Mountain allotment would be removed from the allotment and permanently closed to domestic sheep grazing (as shown on the map provided to Mr. Nelson). This agreement would provide an improved buffer between the domestic sheep allotment and the high priority bighorn sheep herd in the Gore Range.

Vacant Allotments:

The recommendations on vacant allotment closures are not from any one alternative they would fit in any of the alternatives.

The following allotments would be entirely closed.
33 – Homestake S&G.
34 – Beaver Creek S&G.
36 – Tennessee Pass S&G.

The following allotment would have a portion of the allotment closed.
28 – East Lake Creek S&G: That portion within the wilderness area would be closed.

Aerial transportation Corridors:

The Summary of the Draft Environmental Impact Statement (pg. 31) tries to make a case for using aerial corridors to reduce miles driven and to lower auto emissions. What it fails to realize is the largest impact from autos is the day skier coming from Denver. Having an aerial corridor from Vail to Beaver Creek is not going to significantly reduce the air pollution. The aerial corridor may reduce some local air pollution but the impact statewide will not be significant. It further fails to account for the fact that these aerial corridors will still require local residents and guest not staying adjacent to the ski slopes (the most expense and fewest number of beds) to drive to the ski slope to get on the aerial transportation. This same fact also negates the improved automobile circulation. There is no discussion on the air pollution in other areas for the generation of electricity to power aerial transportation. The plan does not discuss the impact on I-70 if the aerial corridors are successful and result in increased skier traffic on I-70.

The alternatives that provide for aerial corridors fail to follow existing mitigation plans for Beaver Creek. The mitigation plan for Beaver Creek required the protection of the area from Beaver Creek to Meadow Mountain. This area is to be managed for elk. All conflicts are to be resolved in favor of elk.

W11890

Sopris Ranger District

1. Avalanche Creek – there is currently a seasonal restriction for travel and a closure area for bighorn sheep management, which does not show on the map. The road is closed to motorized travel (except for administrative use) right after 3rd rifle season and remains closed until May 1. There is a total people closure on the north side of the road for the bighorn sheep management.
2. Braderich Creek – this is an elk production area. Move 3.32 designation west. Seasonal closure is a good idea.
3. Babbish Gulch is an elk and deer production area even though it is within the ski area boundary.
4. Nettle Creek – map shows public access. There is no public access since the road crosses private land in the bottom. Road is also gated and locked.
5. Trail 1954W.1-is this a way? Make sure this is closed in the winter due to bighorn sheep winter use. Also, how is there access on south in the summer?
6. Trail 1964/2-Lilly Lake Trail – there is no public easement across the Darien property to our knowledge.
7. CDOW would like to see 305.2B closed at cow camp.
8. The Perhm Creek trail is designated foot and horseback only (safety concerns between horseback and bikers).
9. Pipeline at Yank Creek and Beaver Creek is designated foot and horseback only, no mechanized.
10. 2090.W – this is around Ski Sunlight – is this a way that is not open to the public? This passes right through elk and deer production area and would need a seasonal closure. There are already some seasonal closures for certain trails on Ski Sunlight due to production areas.
11. Coal Basin – Good place for motorized closure. Maintain foot, horseback, mechanized.
12. Keeping the Hay Park trail 1957 as a designated route and not allowing off trail use is an excellent move.

May 8, 2000

Ms. Martha Ketelle
Forest Supervisor, White River National Forest
Post Office Box 948
Glenwood Springs, Colorado 81602

RE: Forest Use; Forest Rest – A Comment on the White River National Forest Land and Resource Management Plan

Dear Ms. Ketelle:

Thank you for the opportunity to comment on the White River National Forest Proposed Revised Land Resource Management Plan (Forest Plan). The subsequent forest management plan, dubbed the Blended Alternative, represents my official comment on the proposed Forest Plan and the process that rendered it.

The Blended Alternative is a comprehensive, balanced and locally driven plan that is intended to provide the Forest Service with a guidepost to common ground and a common sense compromise on the future management of the White River National Forest. The philosophy guiding the Blended Plan, and the team of forest experts, local officials and forest users who were equal partners in drafting it, is to simultaneously ensure forest use and forest rest, while protecting Colorado water rights from any undue federal preemption.

I hope that the Forest Service will recognize and give due weight and consideration to the merits of this comment when fashioning its final Forest Plan.

As you know, Forest Service regulations dictate that forest plans be revised every 10-15 years to accommodate the evolving needs of and demands on our nation's forests. This planning revision is fundamental to good forest management.

Like other forests throughout the United States, human demand on the White River National Forest has grown at a rapid pace in the last 15 years. Last year, some 9 million people from all across America and around the world visited the White River National Forest to ski, hike, camp, raft, fish, mountain bike, snowmobile, climb, ride horses, watch wildlife, etc.

Today the White River National Forest is the epicenter of family recreation in Colorado.

W11990

In addition to witnessing a sharp increase in demand, the White River National Forest has also seen marked change in the types of activities taking place on the Forest since the existing management plan was implemented in 1984. For instance, the 1984 plan never contemplated the advent of mountain biking, snowboarding, four season resorts, or the proliferation of motorized recreation. In each of these cases and many others, the 1984 plan is unequipped to manage a new breed of forest issues, making now the appropriate time to tailor the Forest Plan to modern demands and current forest health trends.

Several years ago, the Forest Service appropriately undertook the unwieldy task of revamping its Forest Plan to accommodate and manage these many new forest health considerations. When the Forest Service released its proposed plan last September, no one could have predicted the unprecedented level of interest that would mark this process over the course of the ensuing several months. In the time since the plan's release, western Colorado has been embroiled in a passionate public debate that, lately, has taken on weighty national implications. Indeed, the collective attention of forest users nationwide is focused squarely on the White River National Forest and this planning process.

This Forest Plan has become an issue of growing nation al consequence because the White River National Forest is one of the first nationally prominent forests to have its plan up for review during this 10-15 year cycle. As such, it has become the testing ground for a variety of new management techniques and, more controversially, a new forest management philosophy that represents a seismic shift in the way the Forest Service manages our public lands.

Because it is the most visible Forest to be reevaluated during this latest round of revisions, this forest planning process promises to have a substantial and enduring effect on the way the federal government manages our national forests over the course of the coming decade. The outcome of this process will cement a multitude of management precedents that will guide the Forest Service for the next 15 years and beyond.

While the implications of this process may be of national importance, make no mistake about it, this process is an intensely local one. In every conceivable way, the White River National Forest is a fundamental part of who we are in Colorado. From an economic perspective, the Forest is our region's primary economic driver. Recreation on the White River National Forest directly supports 34,000 jobs and indirectly sustains many thousands more. It is responsible for over half of the economic activity in Eagle, Grand, Pitkin and Summit counties and pumps $720 million into Colorado's economy annually.

More significantly, the White River National Forest is the chief supplier of our state's lifeblood and most precious commodity: water. The headwaters of six rivers are located on the White River National Forest, and a seventh -- the Colorado River -- runs through its borders. Colorado is the only state in the union where no free flowing, usable water flows into its borders – in Colorado, it all flows out. Consequently, Coloradans must be vigilant in protecting against the type of tampering, bypass, preemption, and usurpation of Colorado water law that is advocated in this Forest Plan.

In addition, multiple use on the White River National Forest has broad effects on the everyday activities of the communities that adjoin the Forest. For example, our highways, our radio and aviation towers, our natural gas lines and our electrical power lines, to name just a few, are all dependent on an open accessible forest.

Finally, the White River National Forest plays an unmistakable role in shaping our western way of life. The Forest is home to the awe-inspiring natural landscapes we love, it provides critical habitat for the wildlife we admire and it serves as a natural retreat when Coloradans want to escape from the trappings of modern life.

Much more than just an economic spur, then, this Forest contributes immeasurably to the quality of life we uniquely claim in Colorado.

It is against this backdrop that the emotionally charged public debate about the future of the White River National Forest has unfolded. At the heart of this debate is the Forest Service's preferred alternative -- Alternative D -- and the departure it signals from the Forest's historic purpose, use and mission.

For nearly a hundred years, the Forest Service has managed the White River National Forest's 2.25 million acres for multiple use, placing particular emphasis on recreation, in ways consistent with protecting the Forest's biological health. Alternative D calls for a rapid retreat from this multiple-use ethic.

The preferred alternative's management summary states that 'a higher priority [will] be given to physical and biological resources than to human uses of the Forest (Summary of DEIS, page 14)." This unifying principle in Alternative D is an unjustified reversal of the philosophy that has governed the White River National Forest over the last century.

From the onset of this comment period, I have been outspoken in my opposition to Alternative D. In my estimation, Alternative D inadequately balances Colorado's multiple use values with the Forest's biological needs. The

preferred alternative swings the management pendulum too far in a restrictive direction, broadly limiting valuable, reasonable and even benign forest uses.

While I share the preferred alternative's goal of increased emphasis on protecting biodiversity, I emphatically reject the false choice that Alternative D paints between forest use and forest rest. Forest use and forest rest are not mutually exclusive; a balanced management plan can reasonably achieve both.

The problem with the Forest Plan is not that the Forest Service failed to adequately seek and solicit public input. In fact, the opposite is true. The Forest Service did a commendable and equitable job of reaching out to the White River National Forest's community of users, with one notable exception.

The Forest Service fundamentally erred by allowing an interest group to introduce their own alternative as part of the Forest Plan. The job of drafting alternatives should belong to the Forest Service alone. The alternative at issue is, of course, Alternative I which was drafted and submitted by an environmental interest group. Although Alternative I has some outstanding ideas and sound forest management recommendations -- some of which appear in my Blended Plan -- no interest group should be given carte blanche to draft its own plan, seemingly with the blessing of the Forest Service. By appearing to give an outside group special standing in the forest planning process, the Forest Service introduced a perceived bias that has created an air of suspicion and mistrust within some. In the future, the Forest Service should draft all of the alternatives, giving equal footing to the input of every citizen, organization and interest group.

That notwithstanding, the Forest Service does deserve high praise for giving forest users, stakeholders and concerned onlookers numerous opportunities to air their thoughts, concerns, ideas and opinions about the future management of this Forest.

The inadequacy of the Forest Plan, then, is in no way attributable to a lack of public participation in the planning process. The inadequacy of the plan rests in the Forest Service's failure to craft a single alternative that fully captured all of the best of the public's input and all of the best that modern science tells us about managing healthy forests. Unfortunately, the strongest elements of public input and forest science are spread out among the various alternatives, making it difficult -- if not impossible -- for the diverse range of interests involved in this process to coalesce behind a single alternative.

For instance, Alternative C smartly manages recreational use on the Forest for the most part, but it largely ignores widely held scientific principles for actively managing healthy and sustainable ecosystems. For all of its previously highlighted flaws, Alternative D is strong in the realm of aggressively managing forest health through timber harvest, prescribed fire and structural

improvements, though it falls well short of the ideal in managing recreation. Alternative B is backed by sound science in the area of aggressive vegetation management to foster healthy wildlife habitat, but it fails in an array of other areas. Alternative I has some good recommendations for potential wilderness areas, but it too broadly restricts human use on the Forest.

When evaluating each of the DEIS's six alternatives, then, it is clear that the Forest Plan did not fail for a lack of good ideas and sound scientific principles. It failed by not putting all of the good ideas and sound scientific principles in the preferred plan.

With this reasoning in mind, I set out on the long and admittedly treacherous course of formulating a management plan for the White River National Forest that blends the strongest elements of the six alternatives into one management plan -- thus the name Blended Alternative. As it turns out, this was no small undertaking. In fact, the Deputy to the Chief of the United States Forest Service, Jim Furnish, told me that, to the best of his knowledge, no other Member of Congress or U.S. Senator had ever undertaken what is essentially the drafting of a Forest Plan.

After roundly criticizing Alternative D, however, I felt a personal obligation and professional responsibility to do whatever I could to forge consensus and work toward a common-ground solution that unites the White River National Forest community. This Forest Plan is too important to the future of my district and Colorado for me to sit idly on the sidelines.

So for the last six months myself, staff and countless other citizens and local officials have worked to build a balanced and common-sense oriented plan that preserves the Forest's natural integrity and protects important multiple uses. Underlying our effort is the principle that people have a fundamental right to use, but never abuse, this Forest.

Late in the course of this comment period, I have come under criticism by some for not having completed this comment sooner. For those leveling this charge, I would remind that myself, staff and team of supporters have done in five months what the Forest Service did in five years. This is an immense and arduous task that could not be completed in a matter of days or weeks. In fact, Martha, had you and I not been able to reach an agreement on the extension of the comment period, this in-depth comment and many others would not have been possible.

In spite of these very real time constraints, my team has assembled an exceptional management blueprint for the White River National Forest. To a significantly greater degree than Alternative D, the Blended Plan balances forest health and forest access. The Blended Alternative places a significantly

W11990

stronger emphasis on promoting biodiversity than the current plan, but it does so in ways consistent with protecting the historical uses of this Forest.

In short, my plan has more wilderness, more wildlife habitat, fewer off-road trails for motorized use, fewer grazing allotments, less room for allowable ski expansion and less timber harvesting than the 1984 Forest Plan. At the same time, the Blended Plan provides a wide variety of summer and winter recreational opportunities, retains enough grazing allotments to respond to forage shortages in drought years and leaves expansion open to consideration at select ski resorts without waiving any regulatory reviews.

While this summation provides a brief overview of my Blended Plan, a few additional points are worthy of emphasis at this time.

The Planning Team

Very early in this process, I realized that I had neither the technical expertise nor the forest management know-how to build a forest plan by myself. Although I was raised less than a hundred yards from the White River National Forest and know parts of the Forest like my own back yard, I still needed help in this massive endeavor. With this understanding, I enlisted the support of the foremost expert on the White River National Forest in the nation, Richard Woodrow. Mr. Woodrow is the former Supervisor of the White River National Forest. In fact, he wrote the 1984 Forest Plan. In addition, he served as the Forest Service's Assistant Director of Recreation for three years in Washington, DC where he oversaw recreation and wilderness issues nationally.

Mr. Woodrow has played a principal role in advising me throughout this process, and along with my staff, has been a key point person on the ground. His experience, expertise and unsurpassed command of forest management issues is central to the overall success of the Blended Plan.

Mr. Woodrow in turn enlisted the assistance of Bob Cron, a former ranger at Gallatin National Forest and close adviser to Woody when he worked in Washington. He is perhaps best known for his leadership in helping develop the Mesa County / Grand Junction Riverfront Commission's Legacy Project plan. Mr. Cron is a widely respected forest planner whose service in this process has been invaluable.

In addressing the critically important water issues at stake in this process, we worked intimately with the Colorado River Conservancy District's Board of Directors and staff. The River District's unrivaled expertise in the arena of Colorado water law proved eminently beneficial in addressing the bypass flow issue.

Finally, we placed considerable stock in the knowledge of the County Commissioners in Eagle, Garfield, Mesa, Rio Blanco and Summit counties. In addition to having their finger on the pulse of what their local constituencies desired in this Forest Plan, these commissioners offered a wealth of site specific knowledge that was instrumental to our efforts.

Process

The Blended Alternative was built at the local level and is the very embodiment of a community plan. As I mentioned previously, we relied heavily on the knowledge and expertise of County Commissioners and, to a lesser extent, city council members in the affected communities.

Our team queried and probed and ultimately fashioned this Blended Plan on a community by community basis. The one-on-one local interaction that defined our planning process is the hallmark of the Blended Plan.

Specifically, we asked local officials to identify in detail how they would like to see the Forest Service lands in their community managed. We sought the advice of local officials on which areas to manage as wilderness, how much room, if any, to leave open to consideration for possible growth at the local ski resort, which roads and trails in their community to leave open and which to close and, finally, how best to protect water rights in their community.

Rather than treating Rio Blanco and Summit Counties, for instance, as though their concerns in this process were somehow the same, we sat down with both on an individual basis, working to custom manage the Forest to the needs of each individual county. Our plan is built to recognize and accommodate the diversity of needs and uses between the affected counties.

Officials in Summit County, for example, were alarmed with the amount of timber harvesting called for in their county under Alternative D. The preferred plan would confine 45% of the Forest's overall timber harvest to locations within the borders of Summit County. To remedy this concern, my plan substantially reduces the amount of timber harvesting in Summit County, evenly spreading harvests throughout the Forest.

Similarly, the Eagle County Commissioners and many in their community advised us that the lone recommended wilderness area in their county under Alternative D -- a parcel only partially located in Eagle called Dome Peak -- was less deserving of a wilderness designation than a larger tract adjoining the Holy Cross Wilderness area called No Name. At the county's direction, the Blended Plan recommends that the 3,600 acre No

Name area be managed as wilderness, giving my plan more new wilderness in Eagle County than the preferred alternative.

Even though Pitkin County and the City of Aspen announced their joint support for a synthesis of Alternatives D and I very early in this process, the two entities did submit lengthy correspondence to me in February in which they outlined a very specific vision for the future management of Forest Service lands in their community. In the end, my plan adopts the city's and county's joint recommendation almost in its entirety. For instance, my plan allocates no room for ski expansion in Pitkin County beyond the boundaries of existing permits and prescribes the Hunter and North Independence sites as recommended wilderness areas, as was requested by local officials and outlined in Alternatives D and I. For all practical purposes, then, the Blended Alternative in Pitkin County is an Alternative D and I composite, again, because that was the direction we were given by local officials. One notable deviation in the Blended Plan from Alternative D in Pitkin County is Assignation Ridge, which the preferred alternative recommends as wilderness. Because the city and county did not express a desire to see this enormous tract designated as a recommended wilderness area, my plan does not, instead managing it under the restrictive Research Natural Area prescription.

These are just a few of the many examples of the extent to which my team relied on local officials when fashioning the Blended Plan. The Blended Plan's shape, form and figure is ultimately the product of the wise counsel offered by local officials throughout western Colorado

Water

As I mentioned previously, water is of paramount interest and utmost importance in this process. Under no circumstances will I support any forest plan if it impedes or impinges on Colorado water law. The supremacy of Colorado water rights is a non-negotiable issue for me.

The most grievous component of the Forest Plan is its federal bypass flow regulations. The bypass flow restrictions ostensibly leave the door wide open to federal preemption of Colorado water rights. By coercing water users to surrender 10% of a water claim as a condition of permit renewal, the proposed management plan would unwittingly roll back the time honored preeminence of Colorado water law vis-à-vis the federal government.

In addition to being legally suspect, the proposed bypass flow restrictions are unnecessary given the success of Colorado water law in guarding river and stream ecosystems from the environmental decay caused by insufficient instream flow levels. Colorado has long sanctioned bypass

flow restrictions that are among the most stringent in the country. To argue otherwise is to distort the reality of Colorado water law. Moreover, the proposed federal bypass flow restrictions needlessly duplicate safeguards already provided under state law. Colorado neither needs nor desires the federal government's assistance in managing our water.

Let me be clear: the Forest Service will not establish a national bypass flow precedent on the White River National Forest without a political fight from me and a likely legal challenge from Colorado water users. Accordingly, the agency would be well-advised to avoid expending its resources and political capital imposing safeguards that already exist.

If the Forest Service remains compelled to seek a bypass flow claim, it should adopt the water provisions in my Blended Alternative which more equitably address the instream flow question. In brief, the Blended Plan would make any federal bypass flow claim on the White River National Forest subject to Colorado water law and the accompanying adjudication process. As such, it treats the federal government like any of the other 3 million water users in Colorado.

Wildlife Management

One of the many allures of the White River National Forest is the unparalleled opportunity it offers to witness a multitude of diverse wildlife species in their natural state. Protecting the health and viability of these species is a leading priority in the Blended Alternative.

With this priority as its guide, my plan aggressively manages wildlife habitat to improve the biological diversity needed to sustain the health and viability of all species. The plan actively and aggressively works to maintain the population of all species well above minimum viability levels, placing particular emphasis on threatened and endangered species, sport fish, and big and small game.

A shared priority of the Blended Alternative and Alternative D is the emphasis that both place on protecting winter range for big game wildlife species, particularly deer and elk. The White River National Forest's vast deer and elk herds have little trouble finding ripe forage in spring and summer months, but sustenance in the winter months is always scarce. Moreover, concrete strides must be taken to protect winter range for wildlife species. To a greater magnitude than the current plan, the Blended Alternative protects winter range opportunities. By comparison, the Blended Alternative has 190,735 acres of winter range on the Forest compared to 134,900 acres in the current plan.

Intermix

At the direction of the Northwest Colorado Council of Governments, my plan widely employs a new management prescription -- dubbed Intermix -- in areas where Forest Service lands are isolated or commingle with private lands threatened by development. In these areas, the Blended Alternative calls for the creation of site specific management plans formed by a multi-jurisdictional collaborative process. I believe the intermix prescription will foster cooperation and closer interaction between the Forest Service and local governments when managing lands of shared value and importance on the borders of the White River National Forest.

Allowable Ski Area Expansion

The Blended Alternative reduces the acreage open to consideration for ski area expansion by 12,400 acres when compared to the 1984 Forest Plan. Like Alternative D, my plan caps growth at Aspen, Aspen Highlands, Buttermilk and Snowmass to the boundaries of existing permits.

It is imperative to note that, under my plan, any expansion at the remaining ski areas must continue to satisfy the rigors of the National Environmental Policy Act, any other implicated federal laws or policies and would require extensive public comment. Ultimately, any new expansion would require the approval of the Forest Service and all other affected federal agencies.

The Blended Plan does not approve or even recommend any ski area expansion, it simply leaves narrowly drawn areas open for consideration. The cumbersome burden of proof for any new expansion remains fairly and squarely on the shoulders of the ski industry.

While significantly reducing the area open to consideration for expansion, I do believe that a measure of flexibility must be built into this Forest Plan in the event that it is needed. It would be imprudent to foreclose even the consideration of expansion at this time.

On a general note, skiing and snowboarding is not an inherently evil activity as some have alleged in this process. To treat it as though it were is an injustice to the masses of people who come to the White River National Forest each year to enjoy its world-class skiing.

Travel Management

As I noted previously, the philosophy at the foundation of the Blended Plan is that people have a right to use, but never abuse, this Forest. Nowhere is this concept more important than in the realm of travel management. The Blended Plan seeks to give forest users a variety of recreational outlets, but always in ways consistent with protecting wildlife and promoting the Forest's biological interests.

Guided by this doctrine, we have evaluated the status of every trail on the White River National Forest, closing some, redesignating others and leaving still others to be managed as they are under the existing management plan.

Beyond just evaluating trails and roads, though, the Blended Plan embraces a series of innovative programs and management practices that we believe will prove highly beneficial to the Forest Service when managing forest travel.

- **Looped Trails**: Recognizing that recreational enthusiasts are more prone to leave marked trails if they are required to look at the same scenery in both directions of travel, the Blended Plan advocates the policy of looping trails where possible. By giving motorized and mechanized users lawful opportunities to experience different forest landscapes, the looped trail program will forestall the enticement to stray from open roads and trails that often exists when traveling back and forth on linear trails.

- **Forest Watch**: In an effort to encourage greater involvement of the user public in the enforcement of forest regulations, my plan calls for the creation of a 1-800 number through which law abiding forest users can report unlawful behavior occurring on the Forest to the Forest Service. In a time when cellular phones are widely used, this program promises to have a substantial deterrent value on wanton and reckless behavior. A similar program implemented by the U.S. Fish and Wildlife geared toward catching poachers has been met with real success.

- **Youth Conservation Corps**: After hearing the recurrent concern that the Forest Service lacked sufficient funding to adequately maintain trails, the Eagle County Commissioners introduced the Youth Conservation Corps program which would require youth organizations receiving county funding to participate in any of a range of programs that promote forest health, including trail maintenance and clean-up projects. Eagle County has committed to allocating funding to the Youth Conservation Corps program. This wonderfully innovative initiative promises to contribute mightily to a healthy forest while encouraging positive civic involvement by youth groups. The Forest Service should work to build similar partnerships with other counties,

municipalities and private organizations throughout Colorado by offering matching funds to the Youth Conservation Corps program.

- **Scenic Byways**: If visitors are given meaningful opportunities to experience the beauty of the White River National Forest from existing roads, they will be less likely to travel into the inner reaches of the Forest where environmental decay can occur. That is why the Blended Plan calls for the establishment of three new scenic byways. If the Forest Service properly promotes human use of these existing corridors, and better protects the scenic vistas and viewsheds along these byways, it will likely have an affirmative effect on the amount of travel into the Forest. In addition, it will create an otherwise unavailable opportunity for the elderly and the disabled to glimpse at the natural glories of this Forest.

Wilderness

Up front, it is important to dispel the myth circulated by the more extreme elements in this forest debate that the White River National Forest is widely abused, misused and unprotected. To the contrary, the Forest Service and the U.S. Congress have taken substantial strides to preserve and protect the Forest and its abundant resources. Currently, some 753,000 acres, or roughly one third of the Forest, are managed as wilderness, the strongest management safeguard provided under federal law. By way of comparison, the White River National Forest has a higher percentage of wilderness than any other National Forest in Colorado and is among the highest of any forest in the United States. (For more information, see section entitled *Wilderness on the White River National Forest*.)

That is not to say that the Forest Service and Congress can't do more. In fact, I have identified several areas that merit the increased management protection that comes exclusively with a wilderness designation. Instead of painting wilderness with a broad brush, however, I have evaluated the entire Forest on an area by area basis, closely tailoring the recommended wilderness designations to custom-fit the biological needs of the Forest. In all, the Blended Alternative recommends eight new wilderness sites together totaling 16,020 acres. Local input was the all decisive factor in selecting these designations.

If the Forest Service will move in good faith toward a meaningful compromise on this Forest Plan, I will personally carry legislation in Congress to designate these recommended sites as permanent wilderness.

W11990

During the formulation of the 1984 Forest Plan, it was estimated that approximately 250 people submitted comments to the Forest Service. By contrast, this revision is expected to draw between ten and twenty thousand comments. As witnessed by this remarkable statistic, the good people of Colorado have rightly recognized the gravity of this process and the Forest Service has done a laudable job fostering open and honest dialogue between all of the affected parties. Ultimately, the bright light of public scrutiny that has focused in on this proceeding will yield an improved outcome for the White River National Forest and its users.

While there was an unfortunate level of animus injected into this debate by some, no one has to apologize for feeling passionately about a place as wonderful and special and meaningful as the White River National Forest. At the end of the day, this at times contentious process is something that Colorado can be proud of because the one thing that appears to unite everyone in this great debate is their concern for the future of this Forest.

As you work toward crafting the final Forest Plan, I hope the Forest Service will view our Blended Plan with a careful eye, recognizing both its balance, its innovation and the broad coalition of support built around it. I am proud of the common ground position this Blended Plan stakes out. I genuinely hope the Forest Service will join me there when its work is finished.

Thank you for the opportunity to provide comment on this important matter.

Sincerely,

/s/

Scott McInnis
Member of Congress

A-13

W11990

EXECUTIVE SUMMARY

THE BLENDED ALTERNATIVE
AN EXECUTIVE SUMMARY

Theme

The emphasis is to provide a range of recreation opportunities in balance with biological diversity considerations. The range of recreation that is provided will be determined by projected demand and analysis of trends. The quantity of recreation that is available will be determined by measures of recreation capacity. Ecological constraints may limit recreation activities in some locations of the Forest.

Emphasize vegetative management in all habitat types using such tools as timber harvest, prescribed fire, and mechanical equipment to produce healthy, diverse ecosystems and improve wildlife habitat. This alternative includes human use as an important element of ecosystem management.

Relationship to the Revision Topics

Biological Diversity - Management will focus on maintaining the population of all species well above the minimum viability level. Habitat management will be aggressive with many projects focusing on threatened, endangered, and sensitive (TES) species, sport fish, and big and small game. Watershed conditions will improve. Significant positive changes in vegetation composition and structure will occur.

Travel Management - Provide a balance of trail opportunities for motorized, for non-motorized, and for mechanized opportunities consistent with wildlife and watershed considerations. Some roads and trails will close to resolve resource conflicts. Winter motorized travel opportunities will decrease slightly primarily at lower elevations where travel will be restricted to designated routes. Provide loop r[illegible]d and trail opportunities for both motorized and non-motorized users. Summer off-road and trail motorized travel is not allowed except to access hunter camps within 100 feet of existing roads and for range permit holders to salt and maintain improvements. User conflicts are resolved through a partnership between user groups and the Forest Service. Keep roads

B-1

needed for resource management, administrative access, public access to destinations, and public access to allow driving for pleasure. Utilize volunteer groups and organizations to accomplish road and trail maintenance.

Recreation - Distribution of summer and winter recreation opportunities responds to current visitor demands and projected trends. Ski based resort land allocations are reduced from the present plan but do provide for consideration of some potential expansion to provide improved quality and safety of the skiing experience. Semi-primitive recreation opportunities are balanced between non-motorized and motorized users. Mountain bike opportunities are identified and provided. Based on widespread feedback, opportunities for additional back country huts are few, if any. Existing developed recreation sites such as campgrounds are expanded or improved and new facilities are constructed on environmentally acceptable sites in response to visitor demand or to concentrate visitor use. Visual landscapes are managed to a moderate scenic integrity level.

Roadless Areas - Eight areas are recommended for wilderness designation.

Special Areas - A few special interest areas are established with a balance between education, interpretation, and botanical sites. Designate the two most important special interest areas proposed for interpretation. Three limited use special interest areas are designated. Use existing authorities to manage and protect the other areas.

Research Natural Areas - Recommend two of the proposed areas within each Ecological Section with larger numbers of plant associations. Revise recommended RNA boundaries to remove active allotments and vacant allotments proposed for retention.

Timber Harvest - A moderate level of allowable sale quantity (ASQ) is provided. Less than 5% of the Forest has been harvested in the last century. The Blended Alternative reduces the program harvests by about half and has less average annual harvests than the current plan. Timber harvest is used as a tool to provide for forest health and improve wildlife habitat. The portion of timber harvest that does not contribute to the ASQ is small. Some new roads, either temporary or permanent, will be built. In order to accomplish necessary vegetative management, a viable timber harvest program is needed.

W11990

EXECUTIVE SUMMARY

Other

Wilderness - Manage wilderness portal areas as primitive wilderness. Manage remote wilderness without National Forest system trails and with a high opportunity for solitude as pristine wilderness.

Eight new wilderness parcels adjacent to existing wilderness areas are proposed by this alternative. All of these eight areas are in addition to the 754,000 acres of existing wilderness in the White River National Forest. During the two previous wilderness reviews, a good job was done in identifying and designating the best wilderness candidate lands. Most of the remaining identified roadless areas possess lower wilderness characteristics.

Water - The White River National Forest is the source of six rivers which flow into the Colorado River and beyond. Downstream users are dependent on this National Forest for an adequate quantity and quality of water for their use. Best management practices are an important element of this alternative. We propose working with and through Colorado's well-established instream flow program for needed flows for the Federal Government. State instream flows for fisheries adequately serves National Forest purposes. Federal taking of state water is emphatically opposed by water users, adjudicators, and the State.

Range - Continue existing allotments. Retain vacant cattle allotments if they have potential for future use and to provide future flexibility. Retain some vacant sheep allotments at locations without the presence of bighorn sheep and with minimum other conflicts.

Intermix - Where public lands are isolated or intermixed with private lands threatened by development, include them in this prescription and use a multi-jurisdictional collaborative process to determine their future management.

Forest Health - Actively manage the White River National Forest to maintain acceptable ranges of insect and disease activity and reduce the risk of high intensity wildfire events. Manage forest stand structure and composition to increase biodiversity and mimic the historic range of variability.

SUMMARY OF WILDERNESS IN THE WHITE RIVER NATIONAL FOREST AND COLORADO

Mature Forest in Terms of Wilderness Designation

The White River National Forest encompasses approximately 2,270,000 acres total, 754,344 (33.2%) acres are wilderness. That, according to the DEIS, represents **24% of Colorado's wilderness and " the largest proportion of any national forest in Colorado." p. 404 of Forest DEIS.**

By 1980, this Forest had already undergone the scrutiny of five separate sets of proposals that designated wilderness. These include the following designations:

Name	Year Established	Total Acreage
1. Maroon Bells	1964	163,483 acres
2. Flat Tops	1975	196,360 acres
3. Eagles Nest	1976	133,496 acres
4. Hunter-Fryingpan	1978	73,736 acres
5. Collegiate Peaks	1980	35,671 acres
Holy Cross	1980	113,842 acres
Snowmass	1980	incl. in Maroon Bells
Raggeds	1980	16,832 acres
Total		**733,420 acres**

In other words, following a rigorous inventory process described below, in the first 16 years following passage of the Wilderness Act, **97% of the currently designated wilderness in the White River National Forest was considered and designated as such.** This Forest has been thoroughly and repeatedly inventoried, and is relatively mature as far as designating wilderness. In the last nineteen years, 20,924 acres were added (Hunter-Fryingpan addition and Ptarmigan Wilderness) via Public Law 103-77, the 1993 Colorado Wilderness Act which was H.R. 631 and Congressman McInnis was an original cosponsor.

New Wilderness Recommendations

Eight new wilderness parcels adjacent to existing wilderness areas are proposed by this alternative. All of these eight areas are in addition to the 754,344 acres of existing wilderness in the White River National Forest. During the two formal wilderness reviews in past years, a good job was done in identifying and designating the best wilderness candidate lands.

W11990

SUMMARY OF WILDERNESS IN THE WHITE RIVER NATIONAL FOREST AND COLORADO

Recommended Wilderness	Acres	Connected Wilderness
#19 Black Lake West	900 Approx.	Eagle Nest
#20 Black Lake East	700 Approx.	Eagle Nest
#21b Ute Pass	1,800 Approx.	Ptarmigan
#21c Acorn Creek	900 Approx.	Ptarmigan
#84 Treasure Mtn.	1,500 Approx.	Raggeds
#77 North Independence	4,500 Approx.	Hunter-Frying Pan
#75 Hunter	1,200 Approx.	Hunter- Frying Pan
#57 No Name	3,800 Approx.	Holy Cross
	Total 16,022	

Forest Inventory Process History

Wilderness is defined as "an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation… with the imprint of man's work substantially unnoticeable." (Section 2 of the Wilderness Act of 1964).

The Wilderness Act of 1964 initially designated 9.1 million acres of wilderness in the United States, including the Maroon Bells Wilderness. The Wilderness Act also directed the Forest Service to review the agency's remaining 5.5 million acres of primitive areas for potential wilderness designation, within ten years. This inventory, termed RARE I, was subsequently abandoned.

In 1977, the Forest Service began a third review, as a result of being directed by Congress, of 62 million acres of national forest land, termed RARE II. In 1979, this second formal review of the forests resulted in an additional 15 million acres being recommended for designation as wilderness. In Colorado, the wilderness recommendations of RARE II were considered very early in the process and Public Law 96-560 embodied a significant portion of the recommendations, especially in the White River National Forest. Later, RARE II was challenged in court, and in 1983 the Department of Agriculture announced a reevaluation of all RARE II recommendations.

As a result of these intensive formal reviews by the Forest Service, as well as intervening reviews and additions to the wilderness in the Forest by Acts of Congress, the White River National Forest lands with high wilderness characteristics have been thoroughly inventoried and designated as wilderness. Most of the remaining identified roadless areas do not reflect the same high quality of the wilderness currently designated in the Forest.

W11990

SUMMARY OF WILDERNESS IN THE WHITE RIVER NATIONAL FOREST AND COLORADO

Comparison to Other Forests in Colorado

The **percentage of currently designated wilderness in the White River National Forest is larger than any other forest in Colorado**. The following graph indicates comparable ratios of wilderness to non-wilderness in other Colorado forest management units, as well as other forested areas in the United States. There is little comparison: the White River National Forest has a significantly greater percentage than other comparable National Forests in Colorado and elsewhere in the United States.

C-3

W11990

MANAGEMENT AREA ALLOCATIONS (ACREAGE)

BLENDED ALTERNATIVE
MANAGEMENT AREA ALLOCATIONS
(Acreage)

Management Area			Blended Alternative
1.11	Pristine Wilderness:		90,852
1.12	Primitive Wilderness:		652,256
1.13	Semi-Primitive Wilderness:		3,964
1.2	Recommended Wilderness:		
	#19 Black Lake West	900 Approx.	
	#20 Black Lake East	700 Approx.	
	#21b Ute Pass	1,800 Approx.	
	#21c Acorn Creek	900 Approx.	
	#84 Treasure Mtn.	1,500 Approx.	
	#77 North Independence	4,500 Approx.	
	#75 Hunter	1,200 Approx.	
	#57 No Name	3,800 Approx.	
		Total	16,022
1.31	Back Country Recreation - non-motorized:		92,730
1.32	Back Country Recreation - limited winter motorized:		12,213
1.41	Core Areas:		None
1.5	Wild Rivers - designated and eligible:		
	S.F. White River		
	Crystal River		
	Deep Creek		
	Cross Creek		13,999
2.1	Special Interest Areas - limited use:		
	C.D. Land Bridge		
	Deadhorse Creek		
	Taylor Pass		2,648

D-1

W11990

MANAGEMENT AREA ALLOCATIONS (ACREAGE)

2.2	Research Natural Areas: Highland Section Assignation R. Gift & Cline North Parks Section Difficult Cr. Quandary Pk (SIA)	11,317
3.1	Special Interest Areas - use or interpretation: Camp Hale Holy Cross City	1,741
3.21	Limited Use Areas:	None
3.31	Back Country Recreation - year-round motorized:	30,357
3.32	Back Country Recreation - non-motorized with winter motorized:	62,081
3.4	Scenic River - designated and eligible: South Fork White River Crystal River Deep Creek	3,722
3.55	Corridors Connecting Core Areas:	None
4.2	Scenery:	None
4.23	Scenic Byways, Scenic Areas, Vistas, or Travel Corridors: West Elk Loop Flat Top Trail Top of the Rockies	19,286
4.3	Dispersed Recreation:	79,524
4.32	Dispersed Recreation - high use:	14,772
4.4	Recreation Rivers - designated and eligible: Crystal River Colorado River I Colorado River II	9,444
5.12	General Forest and Rangelands - range vegetation emphasis:	216,811

W11990

MANAGEMENT AREA ALLOCATIONS (ACREAGE)

5.13	Resource Production - forest products:	42,342
5.4	Forested Flora and Fauna Habitats:	518,507
5.41	Dear and Elk Winter Range:	190,735
5.42	Bighorn Sheep Habitat:	23,071
5.43	Elk Habitat:	70,707
5.45	Forest Carnivores:	4,660
7.1	Intermix:	12,556
8.21	Developed Recreation Complexes:	22,830

8.25 Ski-Based Resorts - existing and potential:

	Permitted 1987	1984 Forest Plan Allocation	Permitted 1996	Total 8.25
Arapaho Basin	1,220	2,556	825	2,125
Keystone	5,250	9,667	6,000	10,000
Breckenridge	2,947	7,396	3,096	7,049
Beaver Creek	2,720	4,809	2,695	3,895
Vail	12,510	14,189	12,590	13,190
Copper Mountain	7,113	8,383	7,343	9,243
Sunlight	2,001	4,678	2,081	2,181
Aspen	1,050	1,233	233	233
Aspen Highlands	3,689	3,426	1,561	1,561
Buttermilk	689	955	691	691
Snowmass	5,552	6,521	4,530	4,530
Adams Rib		3,881		None
Rifle - New Area		2,908		approx. 3500
	Totals	**70,602**		**58,198**

8.31	Aerial Transportation Corridors:	None
8.32	Designated Utility Corridors - existing and potential:	20,380

RATIONALE FOR ALLOCATIONS

1.11, 1.12, 1.13 Wilderness. The Blended Plan supports the addition of pristine wilderness management in the remote interior of the Holy Cross Wilderness which is the only significant change from the existing condition shown in Alternative B. Thus the Plan used the allocations from Alternative 'C"which we think are best since the allocation do not provide for pristine management in Willow and Maroon Creeks area of the Maroon Bells Wilderness. The Blended Plan reflects the belief that reaching pristine management in this area is not attainable without wilderness rationing through a permit system, an expensive and invasive change not evaluated in the Draft Forest Plan.

1.2 Recommended Wilderness. The White River National Forest is approximately 1/3 designated wilderness, a proportion higher than any other National Forest in Colorado and most others across the nation. The existing wilderness is high quality. Appendix 'C"Recommended Wilderness documents that the social need for wilderness experience is met by already designated wilderness. Remaining inventoried roadless often contain substantial evidence of man's activities, particularly the many small areas adjacent to existing wilderness. The decision to exclude these adjacent lands which are often of limited size was already made in the original Wilderness decision. The Blended Plan proposes the designation of eight areas adjacent to designated wilderness based on their possession of wilderness values and local constituent desires. Five of these (Treasure Mountain, No Name, Black Lake West, Ute Pass, and Acorn Creek) are rated high in all three primary elements. The remaining three (North Independence, Hunter, and Black Lake East) possess sufficient wilderness characteristics to merit designation.

1.31, 1.32, 3.31, 3.32 Back Country Recreation. The Blended Alternative provides a balance of motorized, non motorized and mountain bike trail opportunities. The area open to snowmobiles is less than Alternative 'B"and more than Alternative 'D". Some loop road and trail opportunities are provided for motorized travel and for mountain bike users. More trails and roads are open to mountain bikes than Alternative 'D". There are fewer roads left open than Alternative 'B", but more than Alternative 'D".

1.41 Core Areas. Alternative B, C, E, and F do not use this prescription. Alternative 'D"uses this prescription for only one area. We believe adequate prescriptions such as 5.4 Forested Flora and Fauna Habitats and 5.43 Elk Habitat are available for this one area without adding to the complexity of understanding and managing this large National Forest.

1.5, 3.4, and 4.4 Wild, Scenic and Recreation Rivers. The Blended Alternative supports the Forest Service staff findings that the South Fork of the White River, the Crystal River, Deep Creek, the Colorado River, and Cross Creek meet the eligibility standards for consideration as Wild and Scenic Rivers.

2.1 Special Interest Areas - Limited Use. There is concern that this prescription adds to the complexity of managing National Forest land which could meet desired conditions through other prescriptions and the use of existing regulations without severe restrictions on human use. That said, the Blended Plan reflects the belief that the Continental Divide Land Bridge unit merits special consideration because of its importance as a wildlife travel corridor, Deadhorse Creek because of its Karst formations and very difficult access, and Taylor Pass because of its small size and number of threatened and endangered plant communities. Quandary Peak is not included in this recommendation for limited use special interest areas because my team thinks this area warrants management as an equally restrictive prescription of Research Natural Area.

2.2 Research Natural Area. The Blended Plan recommends the designation of two research natural areas for each of the two Sections on the White River National Forest. These selections were made based on quality of the candidates as inventoried for number of plant associations as shown in Table G-1 in Appendix G and potential conflicts with important recreation uses and other National Forest resources. For the Highland Section, the Assignation Ridge Area and the Gift and Cline Creeks area provide the best candidates. For the North Parks Section, Difficult Creek provides the best candidate. In this Section, the Blended Plan also recommends the Quandary Peak Special Interest Area with 8,690 acres because of its significant threatened and endangered plants including potential habitat all 12 of the state's rare species. Appendix H analysis says it was not selected as an RNA because of its small size. However, many of the Research Natural Areas recommended in other alternatives are smaller in size. Quandary Peak is the Plan's highest priority for designation as a Research Natural Area.

3.1 Special Interest Areas - Use or Interpretation. The Blended Alternative reflects the belief that interpretation of historic events is highly desired by visitors to the White River National Forest. Camp Hale and Holy Cross City-Gold Park provide the best opportunities. There are other interpretive opportunities but they do not warrant the large land allocations proposed. This Plan supports continuing the Ashcroft special use permit to the Aspen Historical Society, implementation of limited interpretation of identifiable sites in Coal Basin, and interpretation of the Hagerman Tunnel and the Old Independence Townsite.

3.55 Corridors Connecting Core Areas. There are no identified connecting corridors in Alternatives B, C, D, E, or F. There does not appear to be a need for this prescription since we identified no core areas.

4.23 Scenic Byways. National Forest Scenic Byways are very popular and provide an important recreation opportunity. They also bring visitors which improve the economic viability of private business in adjacent communities and resorts. The West Elk Loop and Flat Top Trail are already National Forest Scenic Byways. The Top of the Rockies is a Colorado State Scenic Byway which is recommended for National Forest designation as well.

5.42 Bighorn Sheep Habitat. See Management Area Allocation document for the disposition of vacant range allotments relative to bighorn sheep habitat.

5.45 Forest Carnivore. Management Alternative D proposes to manage 116,900 acres to meet the habitat needs of lynx. At present there is not a viable lynx population on the White River National Forest. It is not clear whether a significant population lynx ever existed, and whatever ecological niche the lynx may have filled has been assumed by other predators. The "Description of Management Practices Affecting Population Viability and Recovery"on page 3-222 of the D.E.I.S. indicates that adequate habitat conditions for lynx already exist. The U. S. Fish and Wildlife Service in its recent listing stated "In the Southern Rockies Regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population." (Federal Register 16,052; 16,059; and 16,061 [2000])

Colorado Department of Natural Resources provided the following information concerning 5.45 Forest Carnivores:

> "The desired condition discusses the need for dense regeneration of conifer forest types, which provide habitat for snowshoe hares eaten by lynx. This may be the most limited habitat condition for lynx in Colorado and, thus, the most badly needed. Some of the worst coniferous habitat types for snowshoe hare and lynx could be the lodgepole pine forests. The WRNF plan states that the forest currently has about 2% of the lodgepole pine in the 1-20 year age class while in 1887, 24% of the forest was in this structural stage. Lodgepole pine forests may have the highest potential to produce high densities of showshoe hare for lynx and other forest carnivores and raptors. However, when these forests mature, they shade out the understory and become almost biological deserts, providing habitat only for red squirrels or hiding cover for big game such as elk."
>
> "While there is also a need to preserve some mature lodgepole pine, present conditions are outside the historic range of variability (HRV). From an ecological standpoint, it appears the WRNF needs to treat significantly more lodgepole pine forests to obtain a younger 1-40 year age class. The treatment could include prescribed burns, "let burn" natural fires and commercial logging. Maintaining ground cover is important for hare populations throughout the forest rebuilding process."

> "The plan states that the Spruce-Fir forests are within the range of historic variability and this is good snowshoe hare and lynx habitat. While we agree with this statement, preliminary date from our snowshoe hare track surveys indicates that 'old growth"forests are not as productive to snowshoe hares as mature forests. Therefore it may be necessary to treat some old-growth Spruce-Fir to improve snowshoe hare habitat. However, Forest Carnivores 5.45 standards for vegetation management (Standard 1.) preclude Spruce-Fir as part of the allowable sale quantity. This should be modified."

In view of the above, the Blended Plan has allocated only one area to prescription 5.45 in an area adjacent to Vail as per an agreement between the Forest Service and Vail Resorts. The remainder of the 5.45 prescription is designated for management under the 5.4 prescription. The Blended Plan reflects the belief that it is much wiser to manage for a diversity of habitats which would benefit a wide range of species including lynx.

8.25 Ski-Based Resorts - Existing and Potential. There is an over-all reduction of 10,486 acres from the 1984 plan to this proposal. Four existing downhill ski areas do not change. The remaining seven retain allocations which, for the most part, move boundaries to definable locations such as ridge lines. This resolves administrative problems with people leaving ski area boundaries to climb higher and ski back into the ski area and allows better provisions for safety such as avalanche control and search and rescue. Boundaries are also adjusted for several ski areas to omit unneeded and not used terrain. Keystone, Breckenridge, Beaver Creek and Arapahoe Basin retain their allocations to improve the quality of skier experience by spreading crowded situations and providing a better balance of available skier terrain, pending compliance with NEPA and Forest Service approval.

Summit County supports consideration of possible expansion for Copper Mountain, Breckenridge, Keystone and Arapahoe Basin. These areas of expansion are already considered in the Summit County Master Plans where they are designated as Recreation and Resource-Public.

One new ski area allocation, an adjusted Rifle Ski Area, is retained from the existing Forest Plan.

A significant reserve of undeveloped terrain does not remain within existing White River National Forest ski area permit boundaries. Although some undeveloped terrain is suitable for development, most is not due to the presence of wetlands, poor snow cover, wind, relation to the sun, cliffs, and boulder areas. The Draft Environmental Impact Statement at 3-334 projects demand for downhill skiing capacity will increase 33% in Garfield County, 33% in Eagle County, and 29% in

Summit County by the year 2010. The DEIS projects no need for additional acres of downhill ski area in Pitkin county through 2010.

The Forest Service needs to preserve the flexibility to consider expansion proposals driven by changing market developments during the life of this plan. Developments like high speed lifts and snowboarding were not anticipated 15 hears ago but the 1984 Forest Plan provided the flexibility to analyze site specific proposals through the NEPA process. The White River National Forest Plan should ensure similar flexibility.

8.31 Aerial Transportation Corridors. No corridors are allocated. The Blended Plan reflects the belief that the opportunity exists to reduce motor vehicle congestion, enhance visitor experience, and save on consumption of motor vehicle fuel. However, since no governmental entities or ski corporations are interested in preserving the option at this time, the Blended Plan has not included them.

POINTS OF CONCERN WITHOUT REGARD TO ALTERNATIVE

I submit the following recommendations to clarify or improve the final White River Forest Plan:

DRAFT LAND AND RESOURCE MANAGEMENT PLAN

Chapter 1 – Forest-wide Goals and Objectives

Goal 1.5 – Conserve Forest Ecosystems

Draft LRMP at 1-4. The goal statement and the accompanying objectives are difficult to understand.

Action: Reword Goal 1.5 to "Provide for biodiversity in forested plant communities which includes a complete range of successional stages through a combination of human manipulation and natural processes.

Action: Reword Objective 1.5a to "By the end of the plan period, 10% to 30% of forested landscapes meet the desired future condition contained in the direction for that management area.

Action: Reword Objective 1.5b to "By the end of the plan period, 10% to 30% of upland landscapes meet the desired future condition contained in the direction for that management area.

Goal 1.10 Water Quality. Objective 1.10. By the end of the plan period, acquire instream flow water rights or establish instream flow protection measures in special-use authorizations which protect 10% of all perennial steams.

Draft LRMP at 1-5. Although a goal and an objective, this may in practice be treated as a standard. The Colorado Water Conservation Board ('CWCB') is the exclusive entity under Colorado law which may appropriate, acquire, and hold instream flow water rights on Colorado rivers and streams. This objective suggests that the Forest Service would like to partially usurp the CWCB's role in the White River National Forest. It is unclear how the objective affects existing water rights (taking?), how other federal agencies (the Corps, FWS, EPA) will attempt to use the provision, and whether the Forest Service's instream flows may be argued to be cumulative with, rather than duplicative of, the CWCB's instream flows.

This goal and objective also suggests that the Forest Service has the legal authority to require private water users to relinquish a part of their decreed water rights to the Forest Service as a condition of obtaining or renewing a special use authorization. The Forest Service does not have such authority. A Federal Water Rights Task Force authorized by Congress several years ago concluded that the Forest Service does not have the authority necessary to allow it to require that water users relinquish a part of their existing water supply or transfer their water rights to the United States as a condition of the grant or renewal of federal permits." (Report of the Federal Water Rights Task Force Created Pursuant to Section 389(d)(3) of P.L. 104-127.)

Action - Goal 1.10 (Page 1-5) should be rewritten to indicate that the White River National Forest will work with the Colorado Water Conservation Board to "provide instream flows wherever such flows are determined to be beneficial and consistent with purposes of the forest" and Objective 1.10 (Page 1-5) must be rewritten to delete any suggestion that established water rights will be taken from public or private organizations.

Goal 2.1. Recreation Opportunities

Draft RLMP at 1-6. The Objectives should include use of partnerships to extend the ability of the Forest Service to accomplish its recreation mission.

Action - Add Objective 2.1c. Develop partnerships with recreation groups to facilitate maintenance, reconstruction, and rehabilitation of trails and recreation facilities.

Draft LRMP at 1-10. The Blended Alternative, at the direction of the Northwest Colorado Council of Governments (NWCCOG), supports building stronger cooperative relations between local government and the White River National Forest.

Action - Revise Goal 3.4 by adding the words "and community" after the word ecosystem. The goal would read "Cooperate with individuals and organizations, and local, state, tribal, and federal governments to promote ecosystem and community health and sustainability across landscapes.

Action - Add Objective 3.4c - Provide a specific process for local governmental jurisdictions to participate in planning and management of NFS lands, especially where local governmental jurisdictions are contiguous to NFS lands.

See also proposed standards and guidelines for the Administration Section Page 2-35.

Chapter 2 - Standards and Guidelines

Air Resources

Standard 1. Meet state and federal air quality standards, and comply with local, state and federal air quality regulations and requirements, either through original project design or through mitigation, for such activities as prescribed fire, ski area development or expansion, mining, and oil and gas exploration and production.

Draft LRMP at 2-3 (emphasis added). Are there local air quality regulations which would apply to a "ski area development or expansion"? Does this standard give local entities air quality authority they otherwise do not have?

Action - Omit the word local from this standard.

Water and Aquatic Resources

Standard 1. Maintain a minimum of 70% of potential aquatic habitat capability for streams capable of supporting a self-sustaining fishery.

Draft LRMP at 2.5. Many streams adjacent to ski areas may be near or below 70% of potential aquatic habitat capability"as a result of historical mining activities. If applied literally, this standard could potentially foreclose existing and future snow making water withdrawals that may have only minimal impacts. A similar provision in the existing Forest Plan has been used by snow making opponents. It is unclear how this standard accounts for mining impacts and other past activities that adversely impact the aquatic resources "baseline". It is also unclear how and where compliance is measured. What is the geographic scope of "aquatic habitat"? The standard does not define "self-sustaining fishery"or "potential aquatic habitat"which are critical elements of the standard. Finally, it is unknown how the standard will take into account natural events such as floods, winter kill, drought, etc. which may impact aquatic habitat and fisheries.

Action - Change Standard 1 to a Guideline which provides direction for the Forest Service to maintain viable aquatic habitat to support a self-sustaining fishery.

Standard 2. Manage land treatments to conserve site moisture and to protect long-term stream health from damage from increased runoff.

Draft LRMP at 2-5. Snow making always produces "increase runoff". Does this standard apply to snow making? Snow making opponents may try to use this

standard to argue that existing and proposed snow making will damage 'long-term stream health'and should be prohibited.

Action - While snow making does not always produce increased runoff, this standard appears to open the way to no timber harvest or other vegetation management which do increase runoff. Change Standard 2 to Guideline 2 which reads: "Manage land treatments to conserve site moisture and to keep increased runoff within acceptable increases."

Standard 5. In the water influence zone next to perennial and intermittent streams, lakes and wetlands, allow only those actions that maintain or improve long term stream health and riparian ecosystem condition.

Draft LRMP at 2.5. For a mandatory prescription, this standard is extremely vague and subjective and raises more questions than it answers. Apart from activities with direct adverse impacts to stream health (e.g., bulldozing a stream bed or dumping pollutants into a creek), it is unclear whether many actions 'maintain or improve long-term stream health and riparian ecosystem condition". Snow making withdrawals, runoff from snow making, erosion from trail construction or maintenance, and other actions may have some effect on steams and riparian ecosystems. For instance, a snow making withdrawal which complies with state water quality standards and classifications arguably may not 'maintain or improve long-term stream health and riparian ecosystem condition". Does this standard prohibit water diversion or other action with a water quality impact? The standard also fails to define critical concepts such as 'water influence zone,"long-term stream health,"and 'riparian ecosystem condition".

Action - Reword Standard 5 to say something like "allow only those actions which do not unacceptably degrade long term stream health. . ."

Action - Add an objective reading: Within 15 years, identify and with the Colorado Water Conservation Board work to protect necessary stream flows for at least 10% of the stream segments identified as having high resource values in the watershed reconnaissance.

Standard 7. Conduct actions so that stream pattern, geometry, and habitats are maintained or improved toward robust stream health.

Draft LRMP at 2-5. Query: Does this standard apply to snowmaking? If so, this standard is too vague to guide compliance with a mandatory prescription to maintain or improve 'robust stream health."

Action - Change Standard 7 to Guideline 7 which reads: "Conduct actions to restore stream pattern, geometry, and habitats which are typical of a robust, healthy stream."

Standard 8. Maintain long-term ground-cover, soil structure, water budgets, and flow patterns of wetlands to sustain their ecological function, per 404 regulation.

Draft LRMP at 2-5. This standard mistakenly suggests that the 404 regulations of the EPA and Corps of Engineers broadly regulate wetlands. They do not. The 404 regulations require the mitigation and avoidance of impacts from discharges or dredged of fill materials into wetlands. The regulations do not set prescriptive standards for non-discharging activities in wetlands. If the standard is applied outside the scope of discharges of dredged or fill materials, it could be interpreted to prohibit snowmaking water diversion which alter flow patterns of wetlands".

Action - Forest Service revise the standard to accurately reflect the 404 regulation.

Standard 12. Apply runoff controls to disconnect pollutant sources from surface and ground water.

Draft LRMP at 2-6. Does this standard apply to snowmaking additives (snowmax) or other salts? The use of the term 'disconnect"suggests that a mere trace of pollutants in surface and ground water may violate the standard.

Action - Change Standard 12 to Guideline 12 which reads: "Apply runoff barriers to buffer pollutant sources from surface and ground water."

Biological

Standard 2. Restrict activities to avoid disturbing proposed, threatened or endangered species during breeding, young rearing, or at other times critical to survival. Exceptions may occur when individuals are adapted to human activity, or the activities are not considered a threat. This determination will be made by a biologist or botanist.

Draft LRMP at 2-9 (emphasis added). The 'avoid disturbing"standard is vague: just how much must ski area operations be changed to 'avoid disturbing' wildlife? And this critical determination is left in the hands of a 'biologist or botanist". A biologist or botanist should consult in the issue but the determination should be made by the District Ranger or Forest Supervisor. This standard reveals the unfettered discretion the Forest Service increasingly places in the hands of biologists.

Action - Change Standard 2 to Guideline 2 which reads: Reschedule, or if needed, restrict human activities to avoid life threatening disturbance of proposed, threatened or endangered species during breeding, young rearing, or at other times critical to survival. Exceptions may occur when individuals are adapted to human activity, or the activities are not considered a threat. This determination will be made in consultation with a wildlife biologist.

Standard 4. Bald Eagle. Human activities should be prohibited within 250 yards of bald eagle winter roosting areas between November 15 and March 1.

Draft LRMP 2-9. Is the Forest Service certain that no portion of any ski area operation or other outdoor venue is within 250 yards of a bald eagle winter roosting area? This standard would shut down several portions of Grand Junction including a Middle School.

Action: Change this Standard to a Guideline.

Wildlife

Standard 1. Seasonal restrictions will be applied to reduce disturbance in key wildlife habitats.

Draft LRMP 2-18. This standard is not definitive. What is 'key wildlife habitat'? What level of disturbance is acceptable?

Action - Delete unless a more definitive and defensible statement is developed. If not delete, make it a Guideline.

Standard 4. Protect known active and inactive raptor nest areas.

Draft LRMP at 2-18. This standard is only appropriate for T&E species.

Action - Revise the wording of the first sentence to read "Protect known active and inactive threatened or endangered raptor nest areas."

Draft LRMP at 2-22. The Standards and Guidelines for noxious weeds do not indicate the need to work with the affected counties to coordinate programs. The counties are also unable to determine the resources available in the alternatives for noxious weed control and prevention.

Action: Add Standard #5. Coordinate noxious weed programs annually with White River National Forest counties.

Action: Identify in the budget section which resources are available for noxious weed control and prevention.

Social - General Recreation

Standard 1. Generally, Standard #9 of Water and Aquatic Resources provides for most recreation-related water uses, but additional water may be needed for special recreation features and heavy-use recreational areas. Maintain enough additional water in associated streams to sustain the water-dependent recreational values

Draft LRMP at 2-25 (emphasis added). It is uncertain whether this standard could be used to prohibit or alter snowmaking diversions. What are 'special recreation features and heavy-use recreational areas'? Could this standard be used to argue that winter flows must be maintained at higher levels to accommodate fishing - a 'water-dependent recreational value'?

Action - Make Standard 1 a Guideline.

Draft LRMP at 2-26

Action - Add a new social recreation schedule entitled "Recreation Travelways" with the following standards and guidelines:

Standard - 1. When closing, decommissioning or restricting use(s) of trails, analyze and document why mitigation is unfeasible and the potential effect of the closure or restriction on current users. Provide this documentation to the local community and county, recreation user groups and known affected individuals.

Guidelines - 1. Close, obliterate, or restrict recreation travelways using the following guidelines:

*** Close or obliterate travelways only where use is damaging or unreasonably disturbs land, wildlife, or vegetative resources and only after making a best effort to identify and implement mitigation alternatives that would leave the travelway open.**

*** Permanently close, obliterate or restrict use only after consulting with concerned members of the public including public officials, user groups and individuals. Provide**

interested individuals, groups and officials with prompt notice of any temporary closures or restrictions.

*** Actively pursue partnerships with affected user groups to secure volunteer labor and outside funding to maintain, reconstruct or relocate travelways to avoid the necessity for closure.**

Administration - Infrastructure

Draft LRMP at 2-31. The Standards and Guidelines do not recognize the value of working cooperatively with local government and private organizations to maintain trails of mutual interest.

Action - The philosophy that the travel map is the final authority when enforcing travel plan provisions should appear somewhere in this section.

Action - Standard 2. Modify the sixth qualifier to read "Travelways do not serve an existing or identified public transportation, management or recreation need."

Action - Standard 2. Modify the seventh qualifier to read "Financing is not available for maintenance necessary to protect resources, taking into consideration volunteer labor that may be available through partnerships with user groups or from other sources."

Action - Guideline 5. Modify the seventh qualifier to read "Cost of continued maintenance and the availability of volunteer labor and outside funding."

Action - Add Guideline 6. Work with local governments, including counties, and all private organizations to secure resources and volunteer labor to maintain trails of common interest.

Administrative - Real Estate

Standard 1. In land adjustment activities, give priority to acquiring lands that contain habitat identified by the U. S. Fish and wildlife Service as necessary for the recovery of federally listed threatened and endangered species.

Draft LRMP at 2-32. Query: How will this standard complicate efforts by private entities to exchange private lands for federal lands? Will it foreclose exchanges that do not contain desired habitat? How will it affect efforts to acquire wilderness inholdings?

Action - Change Standard 1 to a Guideline.

Administrative - Special Uses

Standard 1. Do not approve new uses, and phase out current uses, where the primary use is storage or disposal of hazardous materials, including landfills, when the permits expire.

Draft LRMP at 2-35. There are some beneficial hazardous materials such as explosives and military weapon ammunition. Are any of these stored at CDOT or ski area special uses?

Action - If so, revise the standard to exempt acceptable hazardous materials.

Guideline 1. Do not approve any special-use applications that can be reasonably met on private or other federal lands unless it is clearly in the public interest.

Draft LRMP at 2-35. This guideline may open the door to arguments that winter recreation should not be expanded on federal lands or at a particular ski area because it can be supplied on private lands or another ski area on federal lands. Similar arguments are being raised to oppose a ski area expansion on the White Mountain National Forest in New Hampshire. How does this guideline accommodate the Forest Service's policies in favor of winter recreation and skiing on National Forest System lands?

Action - Reword Guideline 1. As follows: Do not approve new special-use applications.

Add Guideline 2. Give priority to expansion of existing special uses over new special uses providing the same service.

Administrative - Transportation and Utility Corridors

Standard 3. Do not authorize conflicting uses or activities within transportation and utility corridors.

Draft LRMP at 2-35. What are 'conflicting uses or activities'? Skiing and snowboarding? Could any recreation activities occur in a transportation and utility corridor?

Action: Change Standard 3. to a Guideline.

Draft LRMP at 2-35. Counties in the influence area feel electronic sites are very important to maintain and improve communications.

Action: Add a Standard that provides meeting with all Counties periodically to evaluate additional electronic transmission needs. Conduct the needed studies with the Counties to evaluate use of vacant capacity at existing sites and the need for new sites.

Draft LRMP at 2-35. At the urging of Northwest Colorado Council of Governments, the Blended Alternative proposes the following Standards and Guidelines to improve cooperative relations between local government and the White River National forest.

Standards - 1. Consult with elected officials for each local governmental jurisdiction adjacent to or affected by the management of National Forest System lands throughout the planning process.

2. In cooperation with local jurisdictions, establish a process through a Memorandum of Understanding for intergovernmental information exchange with local governmental jurisdictions adjacent to or affected by the management of National Forest System lands throughout the planning process.

3. Acknowledge local jurisdictions'approved plans, regulations, and data, and seek resource knowledge provided by local governmental representatives.

4. Involve representatives from local governmental jurisdictions adjacent to or affected by the management of National Forest System lands in the monitoring and evaluation of implemented plans.

Guidelines - 1. Consider the jurisdiction, expertise, and role of state and local governments as regulators, land managers, and citizen representatives when planning the uses of the National Forest System.

2. Recognize the government-to-government relationship between local governments and the federal government.

3. Develop, when appropriate and practicable, coordinated multi-jurisdictional land and resource management plans.

4. Consider local jurisdictions'concerns and suggestions when making decisions and provide documented rationale for the acceptance or rejection of those concerns and suggestions.

1.13 Semi-Primitive Wilderness

Recreation Guideline #4. Except for through travel use, prohibit or restrict recreational livestock.

Draft LRMP at 3-8. This could make wildlife management much more difficult if used to restrict hunting access and restrict the opportunity to harvest big game within wilderness.

Action: Meet with DOW to arrive at a mutually acceptable wording.

5.41 Deer and elk winter range

Wildlife Guideline #1. Where trees and shrubs are sparse, and terrain is the primary factor providing cover, prohibit human activity during periods when elk and deer are concentrated in the area.

Draft LRMP at 3-60. This guideline is ambiguous and needs clarification.

Action: Reword to "Where trees and shrubs are sparse and terrain is the primary factor providing cover, restrict human activity to designated roads and trails during the winter or elk calving period as defined on 3-65.

5.45 Forest Carnivore Prescription Area

Issue: This is a management prescription area that was created by the White River National Forest staff to address Lynx and Wolverine habitat. Active treatment is limited to aspen and lodgepole pine cover types, although areas with significant amounts of spruce-fir are in the prescription.

Current thinking suggests wildlife habitat should not be managed for a single species, but rather for multi-species habitat needs. At this time there is limited knowledge on the needs of the Lynx and Wolverine and their habitat requirements. This seems more applicable now that the U.S. Fish and Wildlife Service has determined that in the Southern Rocky Mountain Region, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of a continuous U.S. lynx population.

Action: A better prescription is 5.4 Forested Flora and Fauna Habitats, where active management occurs in "a variety of forest and non-forest plant communities and successional stages, over the long term, through a combination of human manipulation and natural processes."

7.1 Intermix

Desired Condition. Cooperative relationships are emphasized with other agencies and adjacent private landowners.

Draft LRMP at 3-70. The White River National Forest Analysis of Management Situation (AMS), published in July of 1997, identified urbanization as one of the seven revision topics. Only six of the original seven revision topics are listed within the Draft Forest Plan. The Urbanization Revision Topic is not directly addressed in the summary of each management alternative and there is little mention in the body of the text. The AMS states that there are no legal requirements related to this topic However, Forest Service policy to cooperate with state and local governments, to engage in boundariless planning and to implement ecosystem management clearly dictates the need for collaboration with others in developing management strategies for the forest plan (AMS page 3-38)." Further support for the need for multi-jurisdictional collaborative planning comes from the USDA Committee of Scientists who recommended that a way to improve the management of National Forests is to "...develop more collaborative relationships with local communities ... throughout the planning process." The AMS identified the dimensions of the Urbanization Revision Topic to include Access, Recreation, Fire, Vegetation Management, Watersheds, Wildlife, Domestic Grazing, Mineral Activity, Air Quality, Special Uses, Landownership Adjustment, and Safety.

The final Land and Resource Management Plan must better reflect the need to consider local government master plans in developing the final Forest Plan and to establish a culture of collaboration with local and state government in resolving issues on intermingled National Forest and private lands or National Forest lands adjacent to urbanizing private land.

Action - Include the following statement: Cooperative relationships are emphasized with local, county, and state governments, agencies and adjacent private lands. Local government and agency master plans are considered when planning National Forest projects. Public comment on National Forest projects will include local governments, agencies and adjacent land owners. The White River National Forest will develop a culture of multi-jurisdictional decision making and seek to mutually develop a multi-jurisdictional decision process.

Action: Add a Standards and Guidelines Section under 7.1 Intermix titled "Cooperative Relations" and develop appropriate Standards and/or Guidelines to ensure that planning for projects includes consideration of the objective of local governments, and where conflicts are identified, consideration of alternatives to resolve the differences. Include the following Standards:

Standard 1. In cooperation with the Northwest Colorado Council of Governments, identify a pilot area, develop a Memorandum of Agreement and Vision, and mutually develop a multi-jurisdictional decision making process which includes common resource information on a GIS system.

Standard 2. In consultation with the Northwest Colorado Council of Governments, implement the pilot decision model for other intermix areas on the White River National Forest.

Standard 3. With Summit County, develop a comprehensive trail system for the Snake River Basin.

During the first Forest Service public meeting with Eagle County, the County questioned whether the Forest Service had consulted and incorporated local government Master Plan goals and objective into the Draft Forest Plan. They were informed by the planner that these plans were neither consulted nor incorporated into the Forest Plan. This led to a review of the Code of Federal Regulations pertaining to Forest Planning (Title 36, Chapter II, Subpart A, Part 219, Sec. 219.7 (c) which states that the Line Officer shall review planning and land use policies of local governments. The results of this review shall be displayed in the EIS for the plan. This is not the case.

Action: Complete this review before the final Forest Plan is prepared and include a treatment of the following under desired conditions:

(1) Consideration of the objectives of other local governments as expressed in their plans and policies;
(2) An assessment of the interrelated impacts of these plans and policies;
(3) A determination of how each Forest Service plan should deal with the impacts identified; and,
(4) Where conflicts with Forest Service Planning are identified, consideration of alternatives for their solution.

The preferred alternative identified by the White River National Forest in the Proposed Plan Revision and DEIS identifies zero (0) acres of multi-jurisdictional intermix lands on which to apply intermix prescriptions.

Action: The Blended Alternative identifies a number of intermix areas which, if this alternative is not selected, should be carried into the selected alternative.

E. Management Area Direction 8.25 - Ski-Based Resorts

Standard 2. Snowmaking and other water depletions will be conducted to conserve stream pattern, geometry, substrate composition and aquatic habitat in affected perennial streams.

Draft LRMP at 3-78. This mandatory standard is vague: when does a "depletion" "conserve" aquatic resources? The standard is unclear and invites dispute.

Action - Change Standard 2. to a Guideline.

Chapter 3 – Management Area Direction

There are four Management Areas (1.2, 1.41, 1.5 & 2.2) outside existing wilderness where no vegetation management is planned. Natural disturbance processes (fire, weather, and insects and disease) will be allowed to occur in these areas.

Action: For each of these Management Areas identify that the desired condition is to allow natural disturbance processes (fire, weather, and insects and disease) to occur.

In addition, there are twelve Management Areas where it appears some vegetation management will occur because timber harvest is allowed. However, the description of how the forested vegetation will be managed is extremely vague. The vegetation management direction for many of these areas is limited to statements that natural appearance is desired, natural processes will predominate and that vegetation management practices will be used to meet specific resource objectives other than wood production. There is no mention of improving the diversity of age classes. (Management Areas 1.31,1.32, 2.1, 3.1, 3.21, 3.31, 3.32, 3.4, 3.55, 4.2, 4.23 & 4.3)

Action: Add a Forest Health section under each Management Area's Desired Condition and identify the desired forest health condition with a brief paragraph on how the Forest Service will accomplish that desired condition. Add standard and guidelines as needed.

Only Management Areas 5.12, 5.13, 5.4, 5.43, 5.45 & 8.25 are managed to improve forest vegetation diversity. Under Alternative D only about 35-40% of the forested cover types on the Forest are included in these Management Areas.

Appendix F – Management of Late Successional & Old Growth Stands

There is no mention of the fact that several of the Late-Successional Assessment Areas "have an excess of older age classes. These older stands are increasingly susceptible to insects, disease and fire. As a result they constitute a threat to themselves and to adjacent stands. As discussed in Note #1, the 1939-52 spruce bark beetle epidemic on the Flat Tops Plateau killed the old growth spruce in that area. A similar event is very possible in other parts of the Forest.

The Blended Alternative agrees with the Forest Service's decision not to have an old growth standard for Douglas-fir, lodgepole pine and Aspen.

Action: Add the factual information that there is an excess of older age classes to Appendix F.

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Chapter 1 – Purpose, Need & Significant Issues

Biodiversity - Forest Health

Issue: The draft Plan does not adequately address forest health. According to the DEIS (Appendix D-17), "forested stands are trending toward higher magnitudes of maturity and canopy density over most cover types." The DEIS (3-459) shows 112,400 acres of spruce-fir at moderate or high risk to spruce bark beetle and 62,500 acres of the lodgepole pine cover type at moderate to high risk to mountain pine beetle. Aspen stands are aging. There is more aspen than is desired in uniform age classes, which will be replaced by spruce-fir (DEIS 3-96). Appendix D concludes that fire in the lodgepole and aspen cover types are trending toward being outside of the Historic Range of Variability (HRV), and the frequency and extent of high-intensity fires are outside of the HRV (D-33). The section on Insect and Disease concludes that fire suppression has resulted in more large scale insect epidemics, root diseases and lodgepole dwarf mistletoe outside the HRV and ratios of aspen in older age classes, which favor insects and disease, outside the HRV (D-38).

Action: Address the above forest health points in the Final Forest Plan. Perhaps start on page 3-9.

Biodiversity - The description understates the biodiversity intent of the 1984 Forest Plan. One of the primary goals of the 1984 plan was to maintain and improve diversity in the forested vegetative types. Emphasis was placed on maintaining species diversity and improving the distribution of age classes (structural stages). Vegetative diversity is a key component of biodiversity. Further, it is the one component which can be significantly affected by forest management. To convey the impression that the 1984 Plan did not address biodiversity is misleading.

Action: Revise Biodiversity section of Chapter 1 to reflect the above.

Timber Suitability and Allowable Sale Quantity – The description of the timber management program included in the existing Forest Plan is understated. The 1984 Plan provided for an average annual programmed sale quantity (PSQ) of 43.5 MMBF. During the first 1-2 decades, this annual program consisted of 25.2 MMBF of live timber and 18.3 MMBF of dead timber. Primary goals of the program were to:

(1) Salvage the dead spruce killed by the 1939-52 insect epidemic and reduce the potential for damaging fires in the residual spruce-fir stands.

(2) Control the mountain pine beetle epidemic, which was occurring in the lodgepole pine type, and reduce the potential for future insect epidemics by improving the distribution of age classes.

(3) Initiate a more cost effective program for regenerating aspen stands through the use of commercial timber sales.

The 18.3 MMBF of dead timber was not part of the Forest's allowable sale quantity (ASQ). The intent of the program was to salvage the dead spruce first. Then, as the dead timber was depleted, to increase the percentage of live timber (ASQ) to maintain an annual sales program of 43.5 MMBF. This was intended to provide a sustained yield of timber for the dependent industry as well as to continue to improve vegetative diversity. The average annual sales program under the 1984 Plan was 43.5 MMBF, not 25.2 MMBF.

Action: Revise Chapter 1, Timber Suitability and Allowable Sale Quantity section to reflect the information above.

Issues/Topics Not Addressed – Several significant issues were not given consideration in the identification of planning topics:

An Excess of Mature & Old Growth Structural Stages (Age Classes) in the Forested Vegetation Types – Table 3-17 of the D.E.I.S. shows that 46% (607,700 acres) of forest cover types are in mature and old growth structural stages. One footnote to Table 3-17 indicates that many of the Aspen stands shown as being in structural stage 3 (Intermediate - sapling/pole) are actually mature. If these 286,600 acres of pole-sized aspen are added, the total acreage of mature/old growth age classes becomes 894,300 acres (67%). Another footnote to Table 3-17 states that about half of the forested land is in a mature structural stage (4 or 5). This would mean that approximately 665,500 acres are mature or old growth. Only 7% (87,700 acres) of the forested vegetation is in early successional stages.

Whether or not this imbalance in the distribution of age classes is outside the "Historic Range of Variability"is debatable. However, it is clear that the current trend is toward older age classes. The imbalance will become even more pronounced as existing intermediate age classes reach maturity.

Experience has shown that this type of imbalance in a biologic population will not persist indefinitely. Eventually these old stands will be destroyed and regenerated by some combination of weather, insects, disease and fire. Past experiences such as the 1939-52 spruce beetle epidemic and the 1988 fires in Yellowstone have also demonstrated that when these natural events occur they can be large scale and catastrophic.

Further, the diversity of species, which currently exists in the Forest, is declining. Many of the aspen and lodgepole pine stands are steadily converting to fir and spruce. The spruce-fir type is already the largest cover type on the Forest.

In view of the scope of the problem, it is difficult to understand how the conditions and on-going trends in the forest cover types were not identified as an issue or planning topic or at least described under the biological diversity revision topic.

Action: At this point, the easiest treatment of this issue is to revise the Biological Diversity topic sections in Chapter 3 to reflect the above information.

Action: Add a brief description of the timber supply and import picture at an appropriate place in the plan and include this issue on page 1-9.

Chapter 2 – Alternatives

None of the alternatives considered emphasize improving the distribution of age classes in the forested vegetation types or recognize increasing needs for natural resources.

Action: For each alternative, add a description of the impact that alternative will have on diversity of forested plant communities.

Alternative B – As previously stated, the 1984 Forest Plan emphasized management of the forested vegetation types and provided for a sustained timber sales program of 43.5 MMBF per year. Representation of Alternative B as the 1984 Forest Plan is not entirely valid. The DEIS No Action Alternative B contains many changes to the existing Forest Plan, such as: a 50% reduction in the ASQ, withdrawal of approximately 106,000 acres from the suitable timber lands, designation of new management areas and drastic changes to the travel management policy. Alternative A (considered but eliminated), seems to better reflect "no action." The No Action Alternative in the DEIS contains so many changes, it is difficult to accurately access each alternative's variation from current management. Alternative B does not meet the requirement that a No Action (or No Change) alternative be considered.

Action: Revise the description of Alternative B including its timber sale program to accurately reflect the 1984 Forest Plan and facilitate meaningful comparison between current and proposed management alternatives.

DEIS at 2-52. The Draft EIS inadequately identifies and assesses the developed recreation, trail, and road backlog of deferred maintenance and reconstruction. The plan also does not identify for the reader what correction of these deficiencies will cost nor the social and environmental consequences. And, finally, the plan does not

adequately identify the capital investment in developed recreation facilities and trails needed to meet current and expected future demand.

Action: Identify a schedule and the cost for correcting developed recreation deficiencies in deferred maintenance and reconstruction in Table S-2 and Table S-3. In the section on page 3-278 and 3-287, adequately identify the social and environmental consequences of not correcting these deficiencies.

Identify a schedule and the cost for correcting trail deficiencies in deferred maintenance and reconstruction in Table S-2, Table S-3, and in the section on page 3-238 fully discuss the social and environmental consequences of not correcting these deficiencies.

Identify and schedule and the cost of correcting road deficiencies in deferred maintenance and reconstruction in Table S-2, Table S-3, and fully discuss the social and environmental consequences of not correcting these deficiencies on page 3-235 and elsewhere.

Expand Table S-3 to include a Capital Investment section which is not constrained by budget cap so that citizens and policy makers can see the true needs for developed recreation, trail, and road backlog as well as the needs for new recreation and trail investments.

Identify and schedule developed recreation facilities needed to meet current and future demand in Table S-2 and the cost of doing so in Table S-3 without regard to budget level so that citizens and policy makers can see the true needs. Evaluate the social and environmental consequences of not completing the needed recreation facilities and trails in the appropriate sections of Chapter Three.

Chapter 3 – Affected Environment/Environmental Consequences

Watersheds

Table 3-7, page 3-56. The harvest acres during the first decade from the Blue River Drainage in Summit County is 45 percent of the total across the White River National Forest.

Action: Constrain the timber harvest models to spread the timber harvest equitably across the analysis areas.

Biodiversity – Forested Vegetation

During the planning process, considerable time and effort was spent inventorying and analyzing patch characteristics, edge density, old growth, perforation and fragmentation. The results of these analysis indicate that there are few problems in these areas on the White River National Forest. However it appears that much less time was spent determining the rate at which aspen and lodgepole pine stands are being replaced by spruce-fir. Even less time was spent assessing conditions and age class distribution in gambel oak and mountain shrub vegetative types. The analysis effort appears to have been more focused on problems common to forests in the northwest than to local conditions on the White River National Forest.

It also appears that the planners failed to recognize the significance of information collected concerning the ages of forested vegetation and ecological processes. The following is an expanded re-statement of some of the information included in the D.E.I.S.:

Prior to European settlement frequent lightning fires occurred at the lower elevations within and adjacent to the area that is now the White River National Forest. Some of these fires burned upslope into the higher elevations of the Forest until they encountered a change in fuel and/or moisture conditions that prevented further fire spread. In many cases they would have been stopped by aspen stands which had been regenerated by previous fires. Less frequently, lightning fires were ignited at the higher elevations which burned much the same as the fires starting at lower elevations. Fire return intervals probably varied from 10-20 years at the lower elevations to as much 500 years in the high elevation spruce stands on north aspects. Fire return intervals in the middle elevations probably ranged from 100 to 200 years. Fires would also have been more frequent on south and west facing slopes than on north and east aspects. At the lower elevations the fires were probably low to moderate intensity due to lighter fuel accumulations between fires. The higher elevation fires, when they did occur, would have been higher intensity, stand replacement fires. The higher intensity would have been a result of both a greater accumulation of fuels and the branching patterns of fir and spruce.

W11990

POINTS OF CONCERN WITHOUT REGARD TO ALTERNATIVE

Weather, insects and disease also played a role in this natural disturbance regime. The resulting landscape would have been a mosaic of both species types and age classes. The general aspect was probably much more open than the Forest is today.

During the period from 1870 to 1910 the natural fire regime was accentuated by timber cutting and burning associated with settlement. Extensive aspen and lodgepole pine stands became established following those disturbances.

Since 1910 the natural fire regime has been interrupted by fire control. The effectiveness of fire control efforts have been enhanced by the aspen and young lodgepole pine stands which were established following settlement. The aspen stands, in particular, have repeatedly served as natural fuel breaks reducing fire spread. As the result of this protection, most of the forested vegetation types have gone almost a century with comparatively little disturbance to regenerate new stands. The most significant exception to this lack of disturbance was the 1939-52 spruce beetle epidemic, which reduced age classes but did not regenerate new stands. Whether or not the existing conditions are outside the 'Historic Range of Variability"may be a subject for academic debate, but it seems unlikely that so much of the Forest has ever gone almost a century with so little area burned. What is clear is that more than half of the forested vegetation is mature or older and there has been almost a century of fuels accumulation.

Action: You may wish to use this summary on page 3-81.

Much of the following is discussed in detail in the D.E.I.S. and is displayed in Table 3-17 and Figure 3-2. These graphics indicate that:

- There are more than 350,000 acres of aspen 80 years of age or older.
- There are more than 210,000 acres of lodgepole pine 100 years or older.
- There are more than 360,000 acres of spruce-fir 150 years or older.

Depending upon how many of the pole-sized aspen stands are considered to be mature, 50-67% of the forested vegetation is in a mature age class or older.

The planners consider these conditions to be within the 'Historic Range of Variability" and apparently attach little significance to them. However, within the next 50 years the following can be expected to happen:

- Aspen is a short-lived tree and most of the trees that are now 80 years old will die.
- A conifer understory is well established under many of the aspen stands and will become dominant. This type of change, in combination with the mortality of the overstory trees, will convert these stands from natural fuel breaks to part of the fuel component.

- Mountain pine beetle infestations will recur in the lodgepole pine stands. It is reasonable to expect at least 33% mortality in the stands which are now 100 years old. Higher mortality rates can be expected in the older stands.
- Mortality from a variety of agents can be expected in the subalpine fir component of the spruce-fir stands.
- Spruce bark beetle infestations will recur in the spruce stands.
- The decay fungi common to mature and old growth trees will continue to progress reducing the potential utility of these trees for wood products. These losses will be particularly high in the aspen and subalpine fir stands.
- Fires will occur and, because of increasing accumulations of dead fuel, both the fire intensity and the resistance to control will increase. Due to the increasing continuity of fuels, individual fires will burn larger areas than they have in the recent past.

It is not possible to predict how many acres will burn, but some scope of the potential is indicated by the fact that more than 665,000 acres of mature and old growth are at risk. Also, if an average fire return interval of 300 years is assumed for the natural fire regime, an average of 220,000 acres would have burned during a 50 year period. Another indication of the potential is the 600,000 acres which apparently burned from 1870 to 1910.

Due to the moist conditions normally associated with higher elevations, most of the burning will be concentrated in a few drought years.

When these fires occur, they will consume most of the dead wood and kill most of live trees on the areas they burn. Some of the dead and damaged trees will be salvageable but much of the material will no longer be usable for wood products.

Action: My team believes these predictions are accurate given the assumptions in this Forest Plan. You should incorporate these environmental consequences beginning on page 3-96.

Wildfire Hazard Mitigation

DEIS at 3-101. Issue: The draft Forest Plan contains inadequate direction for addressing vegetation management in the wildland/urban interface. Wildfires in this area are costly to local, state and federal governments. Local counties are responsible for providing and paying for structural fire protection against wildfires that ignite on federal lands. Fuel loading at hazardous levels on White River National Forest lands, in the interface, will increase wildfire suppression cost for local counties and the State. These costs are passed on to county and state taxpayers.

Action: In the Final Forest Plan, provide for actively managed National Forest lands adjacent to private lands to reduce wildfire risk. Address vegetation treatments to reduce fuel load and arrangement in high risk and hazard areas.

Ski Based Resorts

DEIS at 3-209. The last paragraph says that skiing and snow grooming equipment causes snow compaction in long linear corridors from base area to mountain summit of most ski mountains. Some species such as lynx are particularly affected by snow compaction. Snow compaction increases areas in which competitor species (such as coyote) can access prey species, reducing the advantage lynx has in these deep snow habitats."

Action: Revise this paragraph to reflect the determination by the United states Fish and Wildlife Service that there is no evidence to support the hypothesis that snow compaction adversely impacts lynx. In their decision to list the lynx as threatened under the Endangered Species Act, USF&WS concluded "Packed snowtrails facilitate the movement of coyotes into formerly inaccessible deep snow habitats occupied by lynx; however, neither I nor those who assisted me preparing this comment have any evidence that competition with coyotes, mountain lions or bobcats is negatively affecting lynx at a population scale." (65 Federal Register 16,052 and 16,081 [2000])

DEIS at 3-305. Table 3-85. This table mixes the use of theoretical annual capacity and practical annual capacity. The third column labeled "Annual Capacity"is actually Practical Annual Capacity which is 60% of theoretical capacity. The fifth column labeled "% Capacity Remaining"is based on Practical Annual Capacity while the sixth column "Annual Utilization"is based on theoretical capacity. Table 3-89 on page 3-333 appears to be based on Practical Annual Capacity but is not so labeled.

Action: Revise the headings in Tables 3-85 and 3-89 to identify where the information is Theoretical Annual Capacity or Practical Annual Capacity. Also check the accompanying text to be sure that the discussion is clear for these two terms.

DEIS at 3-325. The Forest Service under the 1984 Forest Plan has been monitoring environmental affects at downhill ski areas. The 1998 White River National Forest Monitoring Report shows that more watersheds are meeting water quality goals than targeted in the Forest Plan, that more acres of land have benefited from soil improvement projects than planned, and that wildlife habitat is doing well.

Action: Include a brief status of monitoring findings under the General Affects section to give the reader a sense of perspective. A more detailed status of monitoring findings would be appropriate in Chapter Four - Monitoring of the Draft Land and Resource Management Plan.

Timber Management - Sawtimber Allowable Sale Quantity (ASQ)

DEIS at 3-441 Issue: The Draft Forest Plan and DEIS propose sawtimber Allowable Sale Quantity (ASQ) considerably higher than budgeted sawtimber sales. The Plan also prescribes extensive vegetative treatments with multiple benefits. The Forest advocates the use of "active management as opposed to passive management" to achieve the desired future condition goals and objectives. However, fiscal requirements limit the ability to accomplish the objects of active vegetative management and limit the funds used for vegetative management to the timber sales budget line item or fire. Staying with the historic mix of budget funding and limiting treatment to one budget line item constrains the Forest's ability to achieve the Desired Future Conditions.

The timber program experienced budget level should produce 20-22 mmbf annually. Such a program would require a budget of approximately $2.7 million. I recommend that you either move funds from ecosystem management and wildlife to this line or footnote that benefiting functions will finance the difference between the timber sales line item and the needed funding to accomplish forest health (ecosystem) and wildlife habitat objectives.

Action: Accomplish vegetative treatment outcomes by using a budget mix of benefiting functions.

Watersheds

With the increase in vegetative cover that has occurred during the past 90 years, it would seem logical to assume that water yield from the Forest, as a whole, has declined. However, I was unable to find much mention of this factor in the D.E.I.S.

Action: If there is information to confirm or discount this premise, please include it in the final document.

Fire Management

Table 3-42, page 3-161 identifies the desired role of fire in the various management areas. My team found no similar indication of how insect and disease infestations will be managed in these areas.

Action: Prepare a similar set of insect and disease prescriptions for each management area using Table 3-42 as a model.

Page 3-164 describes the effect of travel management on fire management.

Action: Include the following: Engines and small ground crews are the primary methods of initial attack for fire suppression on the White River National Forest. Road access is a major factor in the effectiveness of these forces. Various alternatives propose varying numbers of existing roads for closure eliminating vehicular access to several parts of the Forest. As a result, both the effectiveness and the efficiency of initial attack on fires in these areas will be reduced in proportion to the loss of road access.

Page 3-268.

Action: Under Affected Environment, please add a more compelling discussion of the importance of existing and additional electronic uses and sites to the mountain residents in the White River National Forest zone of influence including Summit County.

Page 3-315. Pitkin County.

Pitkin County supports a permit adjustment for Snowmass and Buttermilk ski areas to permit the consideration of an East Burnt Mountain Traverse from the top of Burnt Mountain to the bottom of Buttermilk Ski Area. They also support a previously approved traverse trail between Teaser and Jacobs Ladder.

Timber Management

This comment recommends a number of changes in the proposed plan that will provide for a more effective, efficient timber management program . These recommendations are:

Rotation Ages – The proposed rotation age of 140 years for lodgepole pine seem appropriate. However, a rotation age of 250 years for Douglas-fir and the Engelmann spruce – subalpine fir types and 120 years for the aspen type are excessive. Much of the true fir component of the spruce-fir type will die well before 250 years. Desired tree sizes can be obtained by age 200. The old growth inventory and analysis did not identify any need to attempt to maintain all of Douglas-fir and spruce-fir types or the aspen type to such an old age. Shorter rotation ages would increase the potential growth of wood products and favor more diverse vegetation across the Forest.

Action: Use a rotation age of 200 years for Douglas-fir and Engelmann spruce-subalpine fir and 100 years for aspen. See page 3-450 and elsewhere.

Cost Efficiency – The last paragraph on page 3-454 states that the commercial timber sales program will **not** be below cost for any of the management alternatives during the first decade. One of the most significant factors affecting timber sale program efficiency (as determined by TSPIRS reporting) is program size and economies of scale. In view of the low program levels proposed by Alternatives C, E, and I and the low wood products sale level of alternatives C, D, E, and I, sales program above cost under these management alternatives is unlikely.

Another factor which has adversely affected cost efficiency is the inconsistency in timber sale program levels from one year to the next. If the Forest Service really wants a cost effective sales program, they need to provide a more consistent, reliable program.

Action: Select and alternative which provides ASQ of at least 20 million bd. ft. and fund a wood products sale program of at least 20 million bd. ft.

Road Construction – The constraints on road construction as indicated by Tables 3-134 and 3-135 confines the timber sales program to areas that have already received silvicultural treatment in the past. This will prevent any significant improvement of age class distribution to benefit wildlife habitat and make changes in vegetation needed to return to Historic Range of Variability. It will also deny the White River National Forest the ability to reach its long term goals on page 1-4 Goal 1.5 Conserve Forest Ecosystems. Provide for a variety of vegetation types, patterns, and structural components to meet Forest Plan desired conditions. And Goal 1.7 Conserve Ecological Integrity. Maintain or enhance desired biological and physical ecosystem components, and apply management practices that mimic the frequency, intensity, duration, and severity of natural disturbances ... to achieve desired landscape condition.

Action: Do not constrain the ability to accomplish desired vegetation changes by constraining the building of roads into roadless areas where the work is needed.

Economic Stability of Dependent Communities – Dependence upon timber resources from the White River National Forest extends beyond the seven counties discussed in the Social and Economic Section of the D.E.I.S.. As described in Douglas Rideout's Market Assessment of the Timber Situation of the White River NF, the demand and dependence are regional. Processing facilities as far away as Saratoga, Wyoming and Olathe, Colorado use timber from the White River National Forest. If these facilities are forced to close because of the lack of a dependable timber supply, the number of lost jobs will be considerably more than the 31 timber harvest jobs listed in Table 3-163. Also, the economic effect on the communities will be greater because they do not have the strong recreation/tourism economies typical of the five counties within and adjacent to the White River National Forest.

Action: Revise the Social and Economic Section of the DEIS (Starts page 3-467) to adequately consider regional dependency. This section should also recognize the potential for shipping wood products to manufacturing and value added sites via the railroad which traverses the White River National Forest.

Socioeconomic Impacts - Eagle County staff have been unable to document the methodology that the Forest Service utilized in preparing the socioeconomic impact analysis as the supporting documentation was not included in the Draft EIS as stated. Nevertheless, they are concerned that the methodology is flawed. For example, the plan projects that Alternative E (which maximizes recreation opportunities) will generate only 2,500 more jobs during the next 15 years than Alternative I (conservation biology). When comparing these alternatives, Eagle County staff observed that the Other Recreation (non-skiing) employment category is predicted to generate 109 fewer jobs for Alternative E (1,957) rather than Alternative I (2,066).

With the exception of Alternative I ($893.3 million in labor income and 41,115 total jobs) which largely is a preservation strategy, Alternative D generates the lowest labor income $893.9 million) and employment (41,153 jobs) of any alternative. Further, Alternative D generates the second lowest financial and economic net present value or cost/benefit of any alternative. Again, second lowest to Alternative I.

Action: Clearly identify the economic advantages and disadvantage of the alternatives considered in the Final EIS.

Other Considerations – Energy Requirements – It appears that this section of the D.E.I.S. (Page 3-499) was given little consideration. One of the impacts over-looked is that Colorado is a net importer of wood products and that as local production declines there is a corresponding increase in the amount imported. This results in an increase in fuel consumption.

Action: Recognize in this section that energy is consumed in large amounts when we chose not to produce goods and services near the consumer and have to import them.

APPENDIX

Appendix B

Table B-1. A 100-foot buffer on all roads (approximately 1,425 miles) and trails (approximately 690 miles) is not warranted. This withdrawal should only apply to those roads with scenic objectives which preclude timber harvest. The withdrawal should only apply to trails in the national recreation system. Other trails do not require protection other than during disturbing activities where a number of options exist, such as rerouting.

Action: Recalculate the withdrawal of a 100-foot buffer to include only roads and trails with scenic objectives which preclude timber harvest as described above.

Table B-1. The Colorado Best Management Practices prescribe a 50-foot buffer on lakes and streams.

Action: Revise Table B-1 for lakes and streams with a 50-foot buffer. The withdrawal should be 9,487 acres.

Table B-1. The table withdraws 31,370 acres of old growth spruce-fir type from the suitable land base. Since Colorado Division of Wildlife input is that old growth spruce-fir should receive some treatment to improve its wildlife values, I believe that this withdrawal is not desirable.

Action: Unless there is another reason for the old growth spruce-fir withdrawal, revise Table B-1 to exclude this withdrawal.

Action: Revise Table B-2 to reflect changes in Table B-1.

The proposed Draft Forest Plan does not contain direction to manage forested vegetation to maintain species diversity or improve age class distribution in forest vegetation. My team found value in an analysis of the minimal level of forest vegetation per year needed to provide diversity in species and age. This minimal level for the Blended Alternative is as follows:

Tentative suitable timber land common to all alternatives	843,953 acres
100-foot buffer on scenic roads and trails (est.100 miles)	- 2,400
50-foot buffer on lake and stream riparian	- 9,487
100-foot buffer on developed recreation sites	- 5,497
Old growth spruce-fir	- 31,370
Initial suitable timber land common to all alternatives	795,199 acres
Blended Alternative	
Additional administrative withdrawals - Total	-277,626 est.
Management areas not suitable	-266,461 est.
Polygons less than 1 acre (slivers)	- 11,165 est.
Suitable timber land in Blended Alternative	517,573 acres

The proposed plan does not list the distribution of forest cover types within the suitable land base for each alternative. However, the 1984 plan indicated that outside the wilderness, the acreage of the major types were:

Aspen	368,029 acres	36.3%
Lodgepole pine	193,980 acres	19.1%
Douglas-fir	54,960 acres	5.4%
Spruce-fir	397,985 acres	39.2%

Assuming there have been no significant changes in the mixture since 1984, the acreage of suitable timber land in each forest cover type is estimated to be:

Aspen	187,879 acres
Lodgepole pine	98,856 acres
Douglas-fir	27,949 acres
Spruce-fir	202,889 acres
Total	517,573 acres

With rotation ages of 100 years for aspen, 140 years for lodgepole pine, 200 years for Douglas-fir and Spruce-fir, the following acreage needs regeneration each year to keep pace with the aging process:

Aspen	187,879 x 0.01 =	1,879 acres
Lodgepole pine	98,856 x 0.007 =	692 acres
Douglas-fir	27,949 x 0.005 =	140 acres
Spruce-fir	202,889 x 0.005 =	1,014 acres
	Total	3,725 acres

This is the minimum level of forest vegetation needing regeneration each year to keep pace with the aging process on the suitable timber lands. Remember that this level of regeneration will NOT reduce the existing accumulation of tree stands in late successional stages.

Using the forest-wide average of 11.7 MBF/acre, harvesting the 3,725 acres results in an annual sale quantity of 43,582 MBF. **Note: This is a very rough preliminary estimate and will change with the more precise Forest Service computer model runs.**

Action: Include this analysis in Appendix B, Page B-9.

Page B-9 SPECTRUM. The model must have a range of rotation ages. The range of rotation ages should be based on a rotation age of aspen equal to 100, Lodgepole pine equal to 140 years, Douglas-fir and spruce-fir equal to 200 years.

Action: Adjust the rotation ages available in the model based on the above rather than 120 years for aspen and 250 years for Douglas-fir and Spruce-fir. Use the same rotation age range for all management areas.

Page B-9 analysis. The demand analysis for aspen did not assess regional potential. The regional area around the White River National Forest could use up to 20 MMBF of aspen per year. The artificially low constraint place on aspen harvest in the model limits the ability of the Forest to accomplish needed aspen vegetation management.

Action: Reassess the demand for aspen in the regional zone of influenced for the White River National Forest. For the harvest analysis, the minimum aspen harvest should be 8-10 MMBF

W11990

KEY OUTPUTS

BLENDED ALTERNATIVE

KEY OUTPUTS

Developed Public Recreation Capacity
Restored or Reconstructed: **1,290 PAOT / Year**

DEIS page 3-287 identifies a developed site backlog of $65,498,000 on a system with a capacity of 25,793 people at one time. Alternative E, the most aggressive alternative program, only restores or reconstructs 369 PAOT per year. The Blended Plan reflects the belief that the White River National Forest needs to develop a more aggressive strategy than the statement on page 3-287 that 'Beyond the capital investment program, facility construction and reconstruction would be contingent on increased (beyond full implementation) funding levels and on the use of private partners to assist in developing and managing facilities." 'As a result the backlog would continue to increase in all alternatives..." This comment advocates a strategy that would include use of maintenance funds as well as construction monies; mobilization of volunteers from service organizations and user clubs including national camping clubs; use of volunteers such as VOC, youth conservation corps, Eagle Scouts, and others; and seeking grant money from local lottery sources, the National Forest Foundation, and other corporate and business organizations. This comment also advocates assessing the current inventory of facilities to identify those which are remote and under used and closing those which may have outlived their usefulness. The target is to eliminate the backlog in 20 years. The current backlog equates to $2,539 / PAOT. This would require addressing 1,290 PAOT per year with resources worth $3,275,000.

Developed Recreation Capacity Increase: **324 PAOT / Year**

This comment reflects the belief that the Forest Plan should respond to the projected 125% increase (DEIS Page 3-278) in demand for public developed sites by the year 2010. Alternative E, the most aggressive program provides for only 24 PAOT per year. The Blended Alternative recommends a program which constructs needed public recreation facilities other than trailheads (12,958 current PAOT capacity) and which depends on partnership with user groups for additional trailhead construction.

The calculation is:
Step 1 -- 12,958 PAOT X 25% = 3,240 PAOT
Step 2 -- 3,240 PAOT divided by 10 years = 324 PAOT / year of new public recreation facility construction.

G-1

W11990

KEY OUTPUTS

Trail Restoration and Reconstruction **183 miles / year**

I believe the Forest Plan should set the stage for solving the problem of trail maintenance and restoration backlog rather than leaving the problem with the statement on DEIS Page 3-291 'the current backlog in trail maintenance is estimated to be $6,635,000. This backlog would continue to increase in all alternatives; ..." This alternative would implement a strategy to restore substandard trails over a ten year period.

In an effort to encourage greater involvement of the user public in the enforcement of forest regulations, the Forest should create and promote a toll free phone number (a 1-800 number) through which law abiding forest users can report unlawful behavior occurring on the Forest to the Forest Service. In a time when cellular phones are widely used, this program promises to have a substantial deterrent value on wanton and reckless behavior. A similar program implemented by the U.S. Fish and Wildlife geared toward catching poachers has been met with real success.

This comment suggests using a combination of Forest Service trail reconstruction and trail maintenance funds to leverage grants from Colorado State Trails, TEA-21 gas tax enhancement, National Forest Foundation, lottery (GOCO), and local governments. The comment would extend the funded work with volunteer work from hiker, horse, mountain bike, and motorized trail user organizations; local service clubs; Volunteers of Colorado; youth conservation corps; Eagle Scouts; and other sources. Since my team does not have access to the miles of substandard condition trails, we have divided the total system miles by ten to provide an estimate of the work per year. (1,834 miles divided by 10 = 183 miles per year.) Cost would be about $6,635,000 divided by 10 years = $663,500 worth of resources and work per year.

Sawtimber Sales Offered (funded)- **20-22 MM Bd. Ft. annually**

The existing plan for the Forest calls for a program harvest of 43.5 MMBF. The Blended Plan cuts that amount in about half. This amount is also less than the average annual harvest in the Forest between 1984 and 1997.

Allowable Sale Quantity - **Approx. 40 MM Bd. Ft. (per the Forest Service final findings)**

The ASQ is a fairly mechanical calculation using the prescription acres that are available and suitable. The Forest Service will produce the exact number based on computerized modeling and calculations.

G-2

Vacant Range Allotment Allocation to Retention (R) and Partial Retention (P)

#2 Grizzly/Tobor S&G	R
#6 No Name S&G	P
#7 Hunter / Midway S&G	R
#8 Red Mtn C&H	R
#9 Woody Creek C&H	R
#10 Park Creek S&G	R
#13 Copper Mtn. S&G	R
#16 Acorn C&H	R
#17 Black Creek C&H	P
#20 M.C. C&H	R
#21 Pioneer C&H	R
#25 Argentine S&G	P
#26 Corral S&G	R
#27 Searle S&G	R
#28 East Lake Creek S&G	R
#29 North W. Mountain S&G	R
#30 South W. Mountain S&G	R
#31 Squaw Creek C&H	R
#32 Sweetwater C&H	P
#33 Homestake S&G	R
#34 Beaver Creek S&G	R
#36 Tennessee Pass S&G	P
#37 Northside S&G	R
#38 Spring Creek S&G	R
#39 Berry Creek C&H	R
#41 Grizzly Creek C&H	P
#42 Blue Lake S&G	R
#43 No Name C&H	R
#44 Dolan Gulch S&G	R
#45 Transfer S&G	R
#46 Wheatley C&H	R
#47 Upper Crystal S&G	P
#48 Ivanhoe S&G	R
#49 Frying Pan C&H	R
#50 Last Chance S&G	R
#51 Galena, Raspberry, Yule S&G	R

These allotments are retained to provide flexibility in years when moisture shortage decreases available forage on stocked allotments and to provide opportunities for future expansion of existing livestock operations.

For the Holy Cross Ranger District, there is an agreement signed by the Colorado Division of Wildlife and Campbell Hansmire Sheep on March 20, 1998.

W11990

KEY OUTPUTS

This agreement outlines an adjustment to the Red and White Mountain sheep allotment. The North Side (#37) S&G and Spring Creek (#38) S&G vacant allotments would be used for spring grazing and fall egress. The east end of the Red and White Mountain allotment would be removed from the allotment and permanently closed to domestic sheep grazing (as shown on the map provided to Mr. Nelson). The agreement would provide an improved buffer between the domestic sheep allotment and the high priority bighorn sheep herd in the Gore Range .

To benefit bighorn sheep, the Colorado Division of Wildlife, the White River National Forest and several wool growers met during 1997 and 1998 to resolve potential conflict between domestic sheep grazing and wild bighorn sheep herds. The four important bighorn sheep herds are Avalanche Creek, Snowmass-Maroon Creek, Gore Range, and Battlement Mesa. Closures of cattle allotments is included in the list because the closures will benefit bighorn sheep by providing additional forage. Below is a listing of the vacant allotments and their recommended disposition for each of these four herds:

Avalanche Creek Bighorn Sheep Herd

#47 Upper Crystal S&G	Partial Retention. The bighorn herd range is northeast of this allotment. If the allotment is reallocated, revise the northeast boundary to provide a greater separation between the domestic and wild sheep.

Snowmass-Maroon Bells Bighorn Sheep Herd

#1 Brush/East Snowmass S&G	Close
#5 Conundrum C&H	Close

Gore Range Bighorn Sheep Herd

#12 Buffalo Creek S&G	Close
#14 Officers Gulch S&G	Close
#17 Black Creek C&H	Partial Retention, Cattle are not a disease threat.
#18 Boulder Creek C&H	Close
#19 Maryland Creek C&H	Close
#24 Willow Creek C&H	Close
#26 Corral S&G	Retain. This allotment is across Interstate 70 from the principle bighorn range.

WI1990

KEY OUTPUTS

Battlement Mesa Bighorn Sheep Herd

#40 Horsethief C&H	Close

Vacant Range Allotments to Close including the above:

#1 Brush/East Snowmass S&G	Close
#3 Independence S&G	Close
#4 Richmond-Difficult S&G	Close
#5 Conundrum C&H	Close
#11 Baldy S&G	Close
#12 Buffalo Creek S&G	Close
#14 Officers Gulch S&G	Close
#15 Ptarmigan S&G	Close
#18 Boulder Creek C&H	Close
#19 Maryland Creek C&H	Close
#22 Soda Creek C&H	Close
#23 Tenderfoot C&H	Close
#24 Willow Creek C&H	Close
#35 Lake Creek C&H	Close
#40 Horsethief C&H	Close

WI1990

COMPARISON OF MANAGEMENT AREA ALLOCATIONS (ACREAGE)

COMPARISON of MANAGEMENT AREA ALLOCATIONS

(Acreage)

Management Area Prescriptions	Existing Plan	Alternative D	Blended Alternative
1.11 Pristine Wilderness:	82,000	116,100	90,852
1.12 Primitive Wilderness:	661,800	628,600	652,256
1.13 Semi-Primitive Wilderness:	4,000	3,200	3,964
1.2 Recommended Wilderness:	0	47,100	16,022
1.31 Back Country Recreation - non-motorized:	80,700	89,700	92,730
1.32 Back Country Recreation - limited winter motorized:	0	7,900	12,213
1.41 Core Areas:	0	8,200	0
1.5 Wild Rivers - designated and eligible:	14,000	22,200	13,999
2.1 Special Interest Areas - limited use:	0	30,600	2,648
2.2 Research Natural Areas:	300	94,100	11,317
3.1 Special Interest Areas - use or interpretation:	0	0	1,741
3.21 Limited Use Areas:	300	37,700	0
3.31 Back Country Recreation - year-round motorized:	170,100	4,800	30,357
3.32 Back Country Recreation - non-motorized with winter motorized:	100,100	31,000	62,081
3.4 Scenic River - designated and eligible:	4,500	5,000	3,722

W11990

COMPARISON OF MANAGEMENT AREA ALLOCATIONS (ACREAGE)

Management Area Prescriptions	Existing Plan	Alternative D	Blended Alternative
3.55 Corridors Connecting Core Areas:	0	0	0
4.2 Scenery:	0	2,300	0
4.23 Scenic Byways, Scenic Areas, Vistas, or Travel Corridors:	0	13,500	19,286
4.3 Dispersed Recreation:	199,000	61,800	79,524
4.32 Dispersed Recreation - high use:	44,800	22,200	14,772
4.4 Recreation Rivers - designated and eligible:	2,700	9,400	9,444
5.12 General Forest and Rangelands - range vegetation emphasis:	309,100	82,100	216,811
5.13 Resource Production - forest products:	190,000	32,800	42,342
5.4 Forested Flora and Fauna Habitats:	150,100	416,600	518,507
5.41 Deer and Elk Winter Range:	134,900	196,400	190,735
5.42 Bighorn Sheep Habitat:	7,700	115,900	23,071
5.43 Elk Habitat:	16,000	186,000	70,707
5.45 Forest Carnivores:	5,300	116,800	4,660
7.1 Intermix:	0	0	12,556
8.21 Developed Recreation Complexes:	10,700	9,300	22,830
8.25 Ski-Based Resorts - existing and potential:	70,602	43,000	58,198
8.31 Aerial Transportation Corridors:	0	0	0
8.32 Designated Utility Corridors - existing and potential:	18,600	18,600	20,380

G-7

W11990

EAGLE COUNTY (Continued)

MANAGEMENT SUMMARY · EAGLE COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	*6,003 acres*	*27,052 acres*	***22,777 acres***
Primitive Wilderness (1.12)	*149,852 acres*	*129,099 acres*	***133,078 acres***
Semi-Primitive Wilderness (1.13)	*1,100 acres*	*1,037 acres*	***1,100 acres***
Recommended Wilderness (1.2)	None	Dome Peak (only partially located in Eagle County) *669 acres*	**No Name** ***3,593 acres***
Backcountry Recreation-Non-Motorized (1.31)	*4,402 acres*	None	***2,798 acres***
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	**None**
Core Areas (1.41)	None	None	***3,111 acres***
Wild Rivers - Designated & Eligible (1.5)	None	None	**None**
Special Interest Limited Use	None	None	**None**

W11990

EAGLE COUNTY (Continued)

(2.1)			
Research Natural Area (2.2)	None	None	None
Special Interest Areas Minimal Use and Interpretation (3.1)	None	None	Camp Hale approx. 1,500 acres Holy Cross City approx. 300 acres *total acres: 1,741*
Limited-Use Areas (3.21)	None	None	None
Back country Recreation-Year Round Motorized (3.31)	*33,284 acres*	*3,473 acres*	***19,079 acres***
Back country Recreation Non-Motorized w/Winter Motorized (3.32)	*18,938 acres*	*316 acres*	***783 acres***
Scenic Rivers-Designated & Eligible (3.4)	None	None	None
Connect Core Areas (3.55)	None	None	None
Scenery (4.2)	None	None	None
Scenic Byways, Areas, Vistas Or Travel Corridors (4.23)	None	None	Top of the Rockies *5,889 acres*

W11990

EAGLE COUNTY (Continued)

Dispersed Recreation (4.3)	*77,584 acres*	*64 acres*	None
Dispersed Recreation - High Use (4.32)	*4,696 acres*	*3,631 acres*	***1,084 acres***
Recreation Rivers (4.4)	None	None	None
Resource Production -Range Vegetation Emphasis (5.12)	*21,487 acres*	*17,661 acres*	***17,516 acres***
Resource Production - Forest Products (5.13)	*116,624 acres*	*5,874 acres*	***8,835 acres***
Forested Flora & Fauna Habitats (5.4)	*90,691 acres*	*197,778 acres*	***227,014 acres***
Deer, Elk Winter Range (5.41)	*35,700 acres*	*93,438 acres*	***86,943 acres***
Bighorn Sheep Habitat (5.42)	None	*11,221 acres*	***7,038 acres***
Elk Habitat (5.43)	None	*2,794 acres*	***2,824 acres***
Forest Carnivores (5.45)	*5,300 acres*	*59,974 acres*	***4,660 acres***
Intermix (7.1)	None	None	***1,735 acres***
Developed Recreation Complexes	*1,433 acres*	None	***6,140 acres***

W11990

EAGLE COUNTY (Continued)

(8.21)			
Ski Based Resort Expansion Vail (8.25)	14,189 acres	12,590 acres	**13,190 acres**
Ski Based Resort Expansion Beaver Creek (8.25)	4,809 acres	2,695 acres	**3,895 acres**
Designated Utility Corridors-Existing & Potential (8.32)	8,592 acres	None	**8,135 acres**

W11990

GARFIELD COUNTY (Continued)

MANAGEMENT SUMMARY - GARFIELD COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	2,265 acres	2,372 acres	**2,190 acres**
Primitive Wilderness (1.12)	134,965 acres	135,683 acres	**135,156 acres**
Semi-Primitive Wilderness (1.13)	2,247 acres	1,377 acres	**2,247 acres**
Recommended Wilderness (1.2)	None	Sweetwater 17,577 acres	None
Core Areas (1.41)	None	None	None
Wild Rivers (1.5)	601 acres	2,500 acres	**7,296 acres**
Special Interest Limited Use (2.1)	None	Mitchell Creek: 4,550 acres Deadhorse Creek: 11,400 acres Main Elk: 6,290 acres total acres: 11,981	**Deadhorse Creek: 1,135 acres**
Research Natural Area (2.2)	None	Deep Creek: appx. 4,600 acres Main Elk appx. 2,900 acres total acres: 7,414	None
Special Interest Areas Minimal Use and	None	None	None

WI1990

WI1990

GARFIELD COUNTY **(Continued)**

Interpretation (3.1)			
Limited Use Areas (3.21)	None	None	**None**
Back country Recreation-Year Round Motorized (3.31)	*56,075 acres*	*1,051 acres*	***7,706 acres***
Back country Recreation Non-Motorized w/Winter Motorized (3.32)	*43,202 acres*	None	**None**
ONEScenic Rivers (3.4)	None -- Same in each alternative	None -- Same in each alternative	**None --Same in each alternative**
Connect Core Areas (3.55)	None	None	**None**
Scenery (4.2)	None	None	**None**
Scenic Byways (4.23)	None	*161 acres*	***749 acres***
Dispersed Recreation (4.3)	*18,056 acres*	*16,787 acres*	***16,497 acres***
Dispersed Recreation-High Use (4.32)	*5,855 acres*	*1,876 acres*	**None**
Recreation Rivers (4.4)	None -- Same in each alternative	None -- Same in each alternative	**None -- Same in each alternative**
Resource Production-Range Vegetation Emphasis (5.12)	*145,120 acres*	*47,192 acres*	***121,959 acres***
Resource			

GARFIELD COUNTY **(Continued)**

Production-Forest Production (5.13)	*19,672 acres*	None	***9,940 acres***
Forested Flora & Fauna Habitats (5.4)	*26,501 acres*	*111,312 acres*	***90,980 acres***
Deer, Elk Winter Range (5.41)	*14,722 acres*	*16,430 acres*	***23,411 acres***
Bighorn Sheep Habitat (5.42)	None	*15,294 acres*	**None**
Elk Habitat (5.43)	*16,041 acres*	*71,787 acres*	***approx. 40,000 acres***
Carnivore Habitat (5.45)	None	None	**None**
Intermix (7.1)	None	None	**None**
Ski Based Resort Expansion Sunlight (8.25)	*5,773 acres*	*2,081 acres*	***2,181 acres***
Ski Based Resort Expansion Rifle (8.25)	*approx. 3,000 acres*	None	***approx. 3,500 acres***
Designated Utility Corridors-Existing & Potential (8.32)	*478,664 acres*	None	***601 acres***

W11990

GUNNISON COUNTY(Continued)

MANAGEMENT SUMMARY - GUNNISON COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	6,721 acres	6,788 acres	**6,721 acres**
Primitive Wilderness (1.12)	34,504 acres	34,412 acres	**34,516 acres**
Semi-Primitive Wilderness (1.13)	None	None	**None**
Recommended Wilderness (1.2)	None	1,496 acres	**1,458 acres**
Backcountry Recreation-Non Motorized (1.31)	5,647 acrers	6,089 acres	**6,166 acres**
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	**None**
Core Areas (1.41)	None	None	**None**
Wild Rivers (1.5)	None	None	**None**
Special Interest Limited Use (2.1)	None	None	**None**
Research Natural Area (2.2)	None	None	**None**
Special Interest Areas	275 acres	None	**None**

W11990

GUNNISON COUNTY(Continued)

Minimal Use and Interpretation (3.1)			
Limited Use Area (3.21)	None	None	**None**
Back Country Recreation Year Round Motorized (3.31)	None	None	**None**
Back Country Recreation Non-Motorized, Winter Motorized (3.32)	None	None	**None**
Scenic Rivers (3.4)	1,766 acres	2,200 acres	**2,012 acres**
Scenery (4.2)	None	None	**108 acres**
Scenic Byways (4.23)	None	62 acres	**2,788 acres**
Dispersed Recreation (4.3)	8,041 acres	4,334 acres	**None**
Dispersed Recreation High-Use (4.32)	389 acres	None	**None**
Recreation Rivers (4.4)	805 acres	806 acres	**698 acres**
Resource Production Range Emphasis (5.12)	None	None	**None**
Forest Production (5.13)	None	None	**None**
Flora & Fauna (5.4)	864 acres	None	**None**

W11990

***GUNNISON COUNTY*(Continued)**

Deer, Elk Winter Range (5.41)	None	*2,567 acres*	***2,872 acres***
Bighorn Sheep Habitat (5.42)	None	None	**None**
Elk Habitat (5.43)	None	None	**None**
Carnivore Habitat (5.45)	None	None	**None**
Intermix (7.1)	None	None	**None**
Developed Recreation Complexes (8.21)	None	None	**None**
Ski Based Resort Expansion (8.25)	None	None	**None**
Aerial Transportation Corridors (8.31)	None	None	**None**
Designed Utility Corridors-Existing & Potential (8.32)	None	None	***1,572 acres***

W11990

***MESA COUNTY*(Continued)**

MANAGEMENT SUMMARY ·***MESA COUNTY***

MANAGEMENT PRESCRIPTION	*EXISTING PLAN*	*ALTERNATIVE D '*	*BLENDED PLAN*
Pristine Wilderness (1.11)	None	None	***None***
Primitive Wilderness (1.12)	None	None	***None***
Semi-Primitive Wilderness (1.13)	None	None	**None**
Recommended Wilderness (1.2)	None	None	**None**
Backcountry Recreation-Non Motorized (1.31)	*836 acres*	None	**None**
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	***902 acres***
Core Areas (1.41)	None	None	**None**
Wild Rivers (1.5)	None	None	**None**
Special Interest Limited Use (2.1)	None	*4,726 acres*	**None**
Research Natural Area	None	*13,642 acres*	**None**

W11990

MESA COUNTY (Continued)

(2.2)			
Special Interest Areas Minimal Use and Interpretation (3.1)	None	None	None
Limited Use Area (3.21)	None	None	None
Back Country Recreation Year Round Motorized (3.31)	2,366 acres	None	None
Back Country Recreation Non-Motorized, Winter Motorized (3.32)	1,468 acres	None	None
Scenic Rivers (3.4)	None	None	None
Scenery (4.2)	None	None	None
Scenic Byways (4.23)	None	None	None
Dispersed Recreation (4.3)	None	None	None
Dispersed Recreation High-Use (4.32)	None	None	None
Recreation Rivers (4.4)	None	None	None
Resource Production Range Emphasis	42,636 acres	7,477 acres	7,745 acres

W11990

MESA COUNTY (Continued)

(5.12)			
Forest Production (5.13)	821 acres	6,047 acres	5,934 acres
Flora & Fauna (5.4)	370 acres	9,855 acres	14,334 acres
Deer, Elk Winter Range (5.41)	30,206 acres	19,999 acres	21,041 acres
Bighorn Sheep Habitat (5.42)	7,659 acres	None	7,580 acres
Elk Habitat (5.43)	None	22,498 acres	27,765 acres
Carnivore Habitat (5.45)	None	None	None
Intermix (7.1)	None	None	None
Developed Recreation Complexes (8.21)	None	None	None
Ski Based Resort Expansion (8.25)	None	None	None
Aerial Transportation Corridors (8.31)	None	None	None
Designed Utility Corridors-Existing & Potential (8.32)	None	None	None

W11990

MESA COUNTY(Continued)

MANAGEMENT SUMMARY ·MESA COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	None	None	None
Primitive Wilderness (1.12)	None	None	None
Semi-Primitive Wilderness (1.13)	None	None	None
Recommended Wilderness (1.2)	None	None	None
Backcountry Recreation-Non Motorized (1.31)	836 acres	None	None
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	902 acres
Core Areas (1.41)	None	None	None
Wild Rivers (1.5)	None	None	None
Special Interest Limited Use (2.1)	None	4,726 acres	None
Research Natural Area (2.2)	None	13,642 acres	None
Special Interest Areas Minimal Use and Interpretation (3.1)	None	None	None
Limited Use Area (3.21)	None	None	None
Back Country Recreation Year Round Motorized (3.31)	2,366 acres	None	None
Back Country Recreation Non-Motorized, Winter Motorized (3.32)	1,468 acres	None	None
Scenic Rivers (3.4)	None	None	None
Scenery (4.2)	None	None	None
Scenic Byways (4.23)	None	None	None
Dispersed Recreation (4.3)	None	None	None
Dispersed Recreation High-Use (4.32)	None	None	None
Recreation Rivers (4.4)	None	None	None
Resource Production Range Emphasis	42,636 acres	7,477 acres	7,745 acres

W11990

MESA COUNTY(Continued)

W11990

MESA COUNTY (Continued)

(5.12)			
Forest Production (5.13)	821 acres	6,047 acres	5,934 acres
Flora & Fauna (5.4)	370 acres	9,855 acres	14,334 acres
Deer, Elk Winter Range (5.41)	30,206 acres	19,999 acres	21,041 acres
Bighorn Sheep Habitat (5.42)	7,659 acres	None	7,580 acres
Elk Habitat (5.43)	None	22,498 acres	27,765 acres
Carnivore Habitat (5.45)	None	None	None
Intermix (7.1)	None	None	None
Developed Recreation Complexes (8.21)	None	None	None
Ski Based Resort Expansion (8.25)	None	None	None
Aerial Transportation Corridors (8.31)	None	None	None
Designed Utility Corridors- Existing & Potential (8.32)	None	None	None

W11990

MOFFAT COUNTY (Continued)

MANAGEMENT SUMMARY - MOFFAT COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	None	None	None
Primitive Wilderness (1.12)	None	None	None
Semi-Primitive Wilderness (1.13)	None	None	None
Recommended Wilderness (1.2)	None	None	None
Backcountry Recreation-Non Motorized (1.31)	None	None	None
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	None
Core Areas (1.41)	None	None	None
Wild Rivers (1.5)	None	None	None
Special Interest Limited Use (2.1)	None	None	None
Research Natural Area (2.2)	None	None	None
Special Interest Areas Minimal Use and Interpretation	None	None	None

W11990

***MOFFAT COUNTY*(Continued)**

(3.1)			
Limited Use Area (3.21)	None	None	None
Back Country Recreation Year Round Motorized (3.31)	None	None	None
Back Country Recreation Non-Motorized, Winter Motorized (3.32)	None	*118 acres*	***142 acres***
Scenic Rivers (3.4)	None	None	None
Scenery (4.2)	None	None	None
Scenic Byways (4.23)	None	None	None
Dispersed Recreation (4.3)	None	None	None
Dispersed Recreation High-Use (4.32)	None	None	None
Recreation Rivers (4.4)	None	None	None
Resource Production Range Emphasis (5.12)	None	None	None
Forest Production (5.13)	None	None	None
Flora & Fauna (5.4)	None	None	None
Deer, Elk Winter Range	*3,670 acres*	*3,550 acres*	***3,527 acres***

W11990

***MOFFAT COUNTY*(Continued)**

(5.41)			
Bighorn Sheep Habitat (5.42)	None	None	None
Elk Habitat (5.43)	None	None	None
Carnivore Habitat (5.45)	None	None	None
Intermix (7.1)	None	None	None
Developed Recreation Complexes (8.21)	None	None	None
Ski Based Resort Expansion (8.25)	None	None	None
Aerial Transportation Corridors (8.31)	None	None	None
Designed Utility Corridors-Existing & Potential (8.32)	None	None	None

W11990

PITKIN COUNTY (Continued)

MANAGEMENT SUMMARY · PITKIN COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	*36,390 acres*	*48,681 acres*	***28,540 acres***
Primitive Wilderness (1.12)	*228,633 acres*	*216,135 acres*	***235,483 acres***
Semi-Primitive Wilderness (1.13)	*616 acres*	*522 acres*	***616 acres***
Recommended Wilderness (1.2)	None	Portions of Assignation Ridge 18,464 acres North Woody 8,521 acres *total acres: 21,724*	North Independence 4,500+ acres Hunter 1,200+ acres ***total acres: 6,630***
Backcountry Recreation-Non-Motorized (1.31)	*6,781 acres*	*13,703 acres*	***21,618 acres***
Backcountry Recreation Limited Winter Motorization (1.32)	None	*4,174 acres*	***4,311 acres***
Core Areas (1.41)	None	*4,990 acres*	None
Wild Rivers-Designated & Eligible (1.5)	None -- Same in each alternative	None -- Same in each alternative	None -- Same in each alternative
Special Interest Limited Use (2.1)	None	Taylor Pass 486 acres	Taylor Pass 486 acres
Research Natural	None	Portions of Assignation Ridge	Assignation Ridge

W11990

PITKIN COUNTY (Continued)

Area (2.2)		4,000 acres Gift and Cline 11,000 acres Difficult Creek 11,400 acres Taylor Willard 1,400 acres Warren Peak 8,700 acres *total acres: 36,500*	4,000 acres Gift and Cline 11,000 acres Difficult Creek 11,400 acres *total acres: 26,400*
Special Interest Areas Minimal Use and Interpretation (3.1)	None	None	None
Limited Use Areas (3.21)	None	None	None
Back country Recreation-Year Round Motorized (3.31)	*46,779 acres*	*303 acres*	***3,570 acres***
Back country Recreation Non-Motorized w/Winter Motorized (3.32)	*8,537 acres*	*13,604 acres*	***13,556 acres***
Scenic Rivers (3.4)	None -- Same in each alternative	None -- Same in each alternative	None --Same in each alternative
Connect Core Areas (3.55)	None	None	None
Scenery (4.2)	None	*2,337 acres*	None
Scenic Byways (4.23)	None	Highway 82 to Independence Pass and other *9,394 acres*	Highway 82 to Independence Pass ***6,171 acres***
Dispersed Recreation (4.3)	*30,321 acres*	*19,778 acres*	***28,028 acres***

W11990

PITKIN COUNTY **(Continued)**

Dispersed Recreation-High Use (4.32)	*18,100 acres*	*1,233 acres*	***126 acres***
Recreation Rivers (4.4)	*1,855 acres*	*1,569 acres*	***1,774 acres***
Resource Production-Range Vegitation Emphasis (5.12)	*25,784 acres*	*7,040 acres*	***14,092 acres***
Resource Production-Forest Products (5.13)	*32,316 acres*	*12,980 acres*	***13,032 acres***
Forested Flora & Fauna Habitats (5.4)	*9,823 acres*	*39,747 acres*	***65,342 acres***
Deer, Elk Winter Range (5.41)	*16,879 acres*	*17,866 acres*	***18,249 acres***
Bighorn Sheep Habitat (5.42)	None	*4,443 acres*	***3,510 acres***
Elk Habitat (5.43)	None	*13,832 acres*	***8,012 acres***
Carnivore Habitat (5.45)	None	*25,382 acres*	**None (converted to flora and fauna habitat)**
Intermix (7.1)	None	None	***5,692 acres***
Developed Recreation Complex (8.21)	*996 acres*	*1,985 acres*	**Coal Basin** ***6,532 acres***
Ski Based Resort Expansion Aspen (8.25)	*1,233 acres*	*233 acres*	***233 acres***

W11990

PITKIN COUNTY **(Continued)**

(8.25)			
Ski Based Resort Expansion Aspen Highlands (8.25)	*3,426 acres*	*1,561 acres*	***1,561 acres***
Ski Based Resort Expansion Buttermilk (8.25)	*955 acres*	*691 acres*	***691 acres***
Ski Based Resort Expansion Snowmass (8.25)	*6,521 acres*	*4,530 acres*	***4,530 acres***
Ski Based Resort Expansion Coal Basin (8.25)	*14,000 acres (appx.)*	None	**None**
Aerial Transportation Corridor (8.31)	None	None	**None**
Designated Utility Corridors-Existing & Potential (8.32)	*1,521 acres*	*1,507 acres*	***1,455 acres***

W11990

RIO BLANCO COUNTY(Continued)

MANAGEMENT SUMMARY ·RIO BLANCO COUNTY

MANAGEMENT PRESCRIPTION	EXISTING PLAN	ALTERNATIVE D '	BLENDED PLAN
Pristine Wilderness (1.11)	6,173 acres	5,912 acres	6,116 acres
Primitive Wilderness (1.12)	43,578 acres	44,076 acres	43,745 acres
Semi-Primitive Wilderness (1.13)	None	None	None
Recommended Wilderness (1.2)	None	None	None
Backcountry Recreation - Non Motorized (1.31)	1,615 acres	43,309 acres	1,613 acres
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	None
Core Areas (1.41)	None	None	None
Wild Rivers (1.5)	None -- Same in each alternative	None -- Same in each alternative	None--Same in each alternative
Special Interest Limited Use (2.1)	None	Sterry Lake total acres 3,642	None
Research Natural Area (2.2)	None	Oyster Lake in Flat Tops Wilderness Vacant Allotment total acres 14,100	None

W11990

RIO BLANCO COUNTY(Continued)

Special Interest Areas Minimal Use and Interpretation (3.1)	None	None	None
Limited Use Area (3.21)	None	None	None
Back Country Recreation Year Round Motorized (3.31)	23,491 acres	None	None
Back Country Recreation Non-Motorized, Winter Motorized (3.32)	43,202 acres	16,915 acres	41,582 acres
Scenic Rivers (3.4)	660 acres	660 acres	710 acres
Scenery (4.2)	None	None	None
Scenic Byways (4.23)	None	Flat Tops Trail 3,068 acres	Flat Tops Trail 3,068 acres
Dispersed Recreation (4.3)	15,086 acres	8,426 acres	4,441 acres
Dispersed Recreation High-Use (4.32)	4,500 acres	None	None
Recreation Rivers (4.4)	None	None	None
Resource Production Range Emphasis (5.12)	70,472 acres	2,016 acres	53,038 acres
Forest Production (5.13)	9,013 acres	7,883 acres	7,817 acres

W11990

***RIO BLANCO COUNTY*(Continued)**

Flora & Fauna (5.4)	*22,812 acres*	*46,585 acres*	***66,822 acres***
Deer, Elk Winter Range (5.41)	*7,529 acres*	*33,306 acres*	***17,829 acres***
Bighorn Sheep Habitat (5.42)	None	*2,240 acres*	***2,305 acres***
Elk Habitat (5.43)	None	*30,142 acres*	**None**
Carnivore Habitat (5.45)	None	None	**None**
Intermix (7.1)	None	None	**None**
Developed Recreation Complexes (8.21)	None	None	***525 acres***
Ski Based Resort Expansion (8.25)	None	None	**None**
Aerial Transportation Corridors (8.31)	None	None	**None**
Designed Utility Corridors-Existing & Potential (8.32)	None	None	**None**

W11990

***ROUTT COUNTY*(Continued)**

MANAGEMENT SUMMARY ·***ROUTT COUNTY***

MANAGEMENT PRESCRIPTION	*EXISTING PLAN*	*ALTERNATIVE D '*	*BLENDED PLAN*
Pristine Wilderness (1.11)	None	None	**None**
Primitive Wilderness (1.12)	None	None	**None**
Semi-Primitive Wilderness (1.13)	None	None	**None**
Recommended Wilderness (1.2)	None	*5,760 acres*	**None**
Backcountry Recreation-Non Motorized (1.31)	None	None	**None**
Backcountry Recreation Limited Winter Motorized (1.32)	None	None	None
Core Areas (1.41)	None	None	**None**
Wild Rivers (1.5)	None	None	**None**
Special Interest Limited Use (2.1)	None	None	**None**
Research Natural Area (2.2)	None	None	**None**
Special Interest Areas Minimal Use and Interpretation	None	None	**None**

W11990

ROUTT COUNTY(Continued)

(3.1)			
Limited Use Area (3.21)	None	None	None
Back Country Recreation Year Round Motorized (3.31)	2,464 acres	None	None
Back Country Recreation Non-Motorized, Winter Motorized (3.32)	None	None	None
Scenic Rivers (3.4)	None	None	None
Scenery (4.2)	None	None	None
Scenic Byways (4.23)	None	None	None
Dispersed Recreation (4.3)	None	None	None
Dispersed Recreation High-Use (4.32)	None	None	None
Recreation Rivers (4.4)	None	None	None
Resource Production Range Emphasis (5.12)	3,718 acres	None	2,913 acres
Forest Production (5.13)	None	None	None
Flora & Fauna (5.4)	None	503 acres	3,260 acres
Deer, Elk Winter Range	None	None	None

W11990

ROUTT COUNTY(Continued)

(5.41)			
Bighorn Sheep Habitat (5.42)	None	None	None
Elk Habitat (5.43)	None	None	None
Carnivore Habitat (5.45)	None	None	None
Intermix (7.1)	None	None	None
Developed Recreation Complexes (8.21)	None	None	None
Ski Based Resort Expansion (8.25)	None	None	None
Aerial Transportation Corridors (8.31)	None	None	None
Designed Utility Corridors-Existing & Potential (8.32)	None	None	None

WI1990

***SUMMIT COUNTY*(Continued)**

MANAGEMENT SUMMARY ·***SUMMIT COUNTY***

MANAGEMENT PRESCRIPTION	*EXISTING PLAN*	*ALTERNATIVE D '*	*BLENDED PLAN*
Pristine Wilderness (1.11)	*24,430 acres*	*25,569 acres*	***24,430 acres***
Primitive Wilderness (1.12)	*70,278 acres*	*68,839 acres*	***70,278 acres***
Semi-Primitive Wilderness (1.13)	None	*300 acres*	**None**
Recommended Wilderness (1.2)	None	Black Lake West, Ute Pass, Acorn Creek *total acres 3,600*	**Black Lake East, Black Lake West, Ute Pass, Acorn Creek *total acres 4,361***
Back Country Recreation, Non-Motorized (1.31)	None	*2,493 acres*	***40,518 acres***
Back Country Recreation Limited Winter Motorized (1.32)	None	None	**None**
Core Areas (1.41)	None	None	**None**
Wild Rivers (1.5)	None -- Same in each alternative	None -- Same in each alternative	**None -- Same in each alternative**
Special Interest Limited Use	None	Continental Divide Land Bridge 1,025 acres	**Continental Divide Land Bridge**

WI1990

***SUMMIT COUNTY*(Continued)**

(2.1)		Quandary Park 8,690 acres *total acres 9,715*	**1,025 acres *total acres 1,025***
Research Natural Area (2.2)	*328 acres*	Porcupine Gulch in wilderness 6,500 acres Black Creek 11,100 acres Vacant cattle allotment on lower Blue *total acres 17,600*	**Quandary Park *8,690 acres***
Special Interest Areas Minimal Use and Interpretation (3.1)	None	None	**None**
Limited Use (3.21)	*275 acres*	*37,710 acres*	**None**
Back Country Recreation Year Round Motorized (3.31)	*5,756 acres*	None	**None**
Back country Recreation Non-Motorized w/Winter Motorized (3.32)	*21,783 acres*	None	***5,198 acres***
Scenic Rivers (3.4)	None -- Same in each alternative	None -- Same in each alternative	**None -- Same in each alternative**
Connect Core Areas (3.55)	None	None	**None**

W11990

SUMMIT COUNTY(Continued)

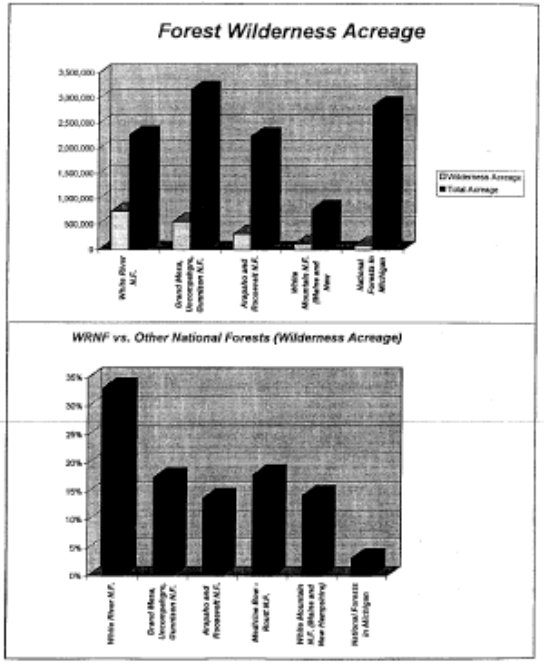
Scenery (4.2)	None	None	None
Scenic Byways (4.23)	None	10 mile canyon *645 acres*	Top of the Rockies 10 mile canyon *3,215 acres*
Dispersed Recreation (4.3)	*50,041 acres*	*12,638 acres*	***26,765 acres***
Dispersed Recreation - High Use (4.32)	*9,805 acres*	*15,335 acres*	***13,605 acres***
Recreation Rivers (4.4)	None	None	None
Resource Production-Range Vegetation Emphasis (5.12)	None	*570 acres*	***1,050 acres***
Resource Production-Forest Products (5.13)	*12,111 acres*	None	***2,859 acres***
Forested Flora & Fauna Habitats (5.4)	*25,385 acres*	*10,947 acres*	***29,379 acres***
Deer, Elk Winter Range (5.41)	25,229 acres	*9,240 acres*	***18,010 acres***
Bighorn Sheep Habitat (5.42)	None	None	None
Elk Habitat (5.43)	None	*44,958 acres*	***12,893 acres***

W11990

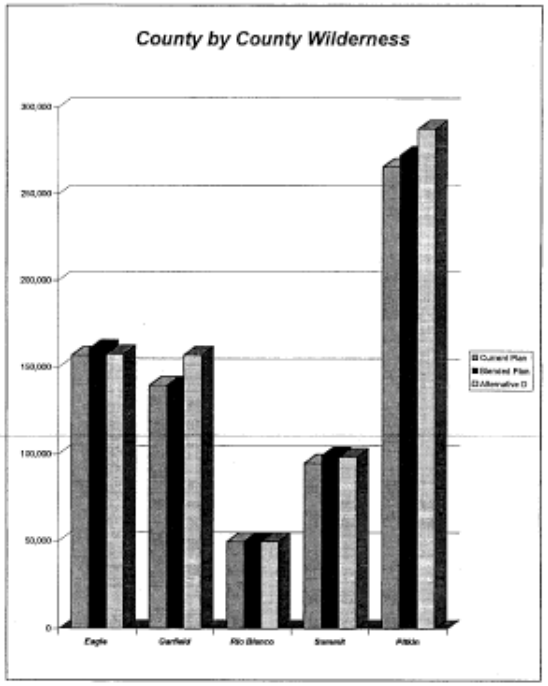
SUMMIT COUNTY(Continued)

Intermix (7.1)	None	None	***5,137 acres***
Ski Based Resort Expansion Arapahoe Basin (8.25)	*2,566 acres*	*825 acres*	***2,125 acres***
Ski Based Resort Expansion Keystone (8.25)	*9,667 acres*	*6,000 acres*	***10,000 acres***
Ski Based Resort Expansion Breckenridge (8.25)	*7,396 acres*	*3,096 acres*	***7,049 acres***
Ski Based Resort Expansion Copper Mountain (8.25)	*8,363 acres*	*7,343 acres*	***9,243 acres***
Aerial Transport. Corridors (8.31)	None	None	None
Designated Utility Corridors-Existing & Potential (8.32)	*8,470 acres*	*8,468 acres*	***8,135 acres***

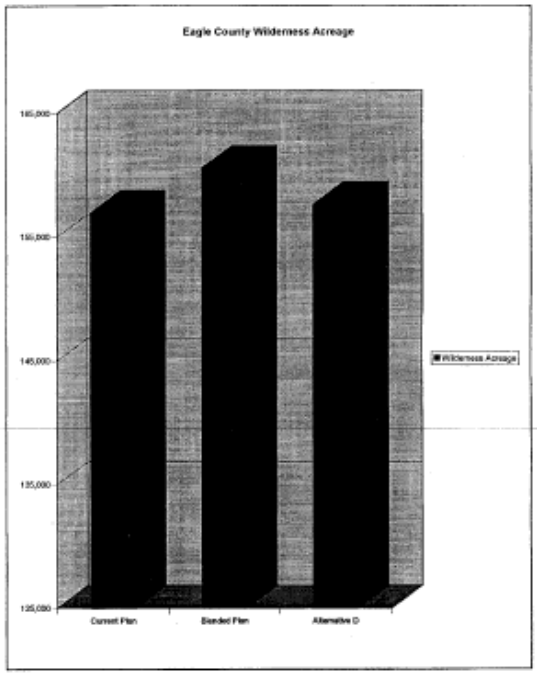
W11990



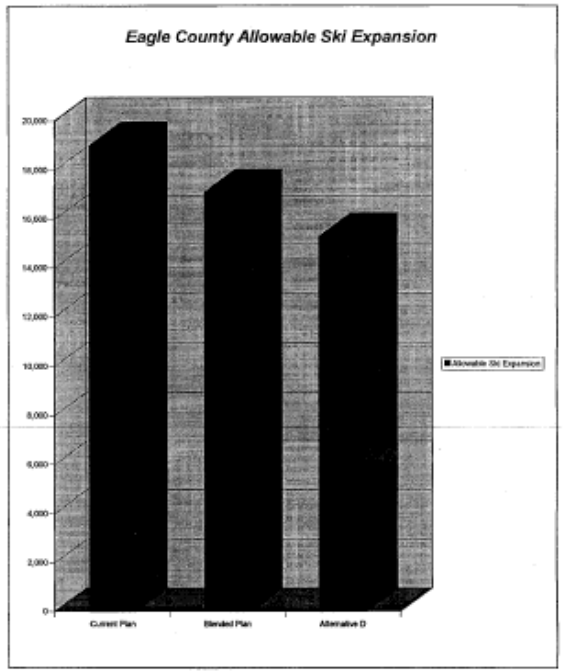
W11990



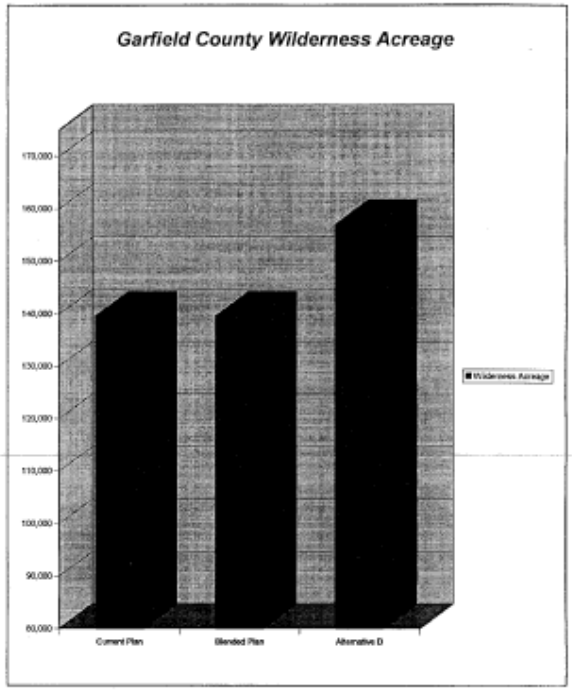
W11990



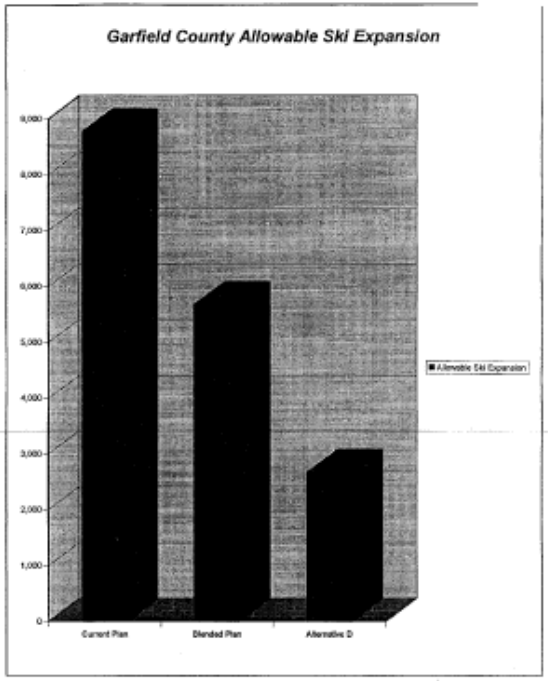
W11990



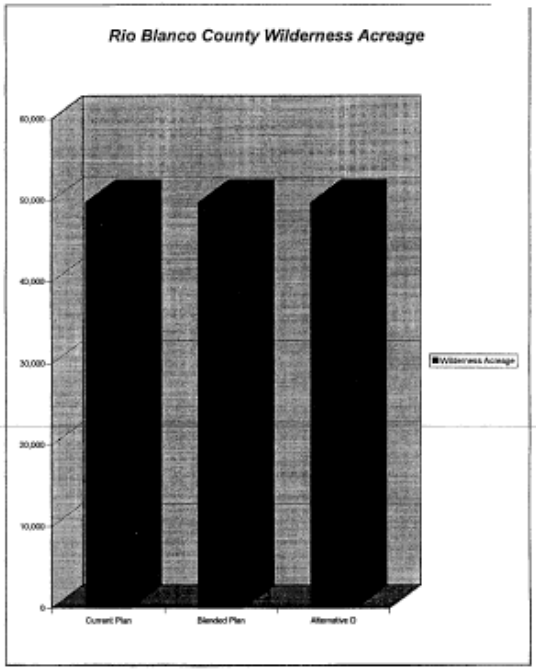
W11990



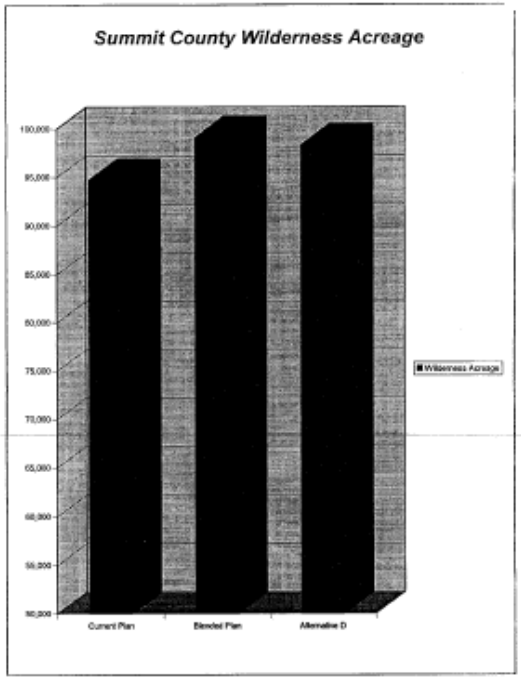
W11990



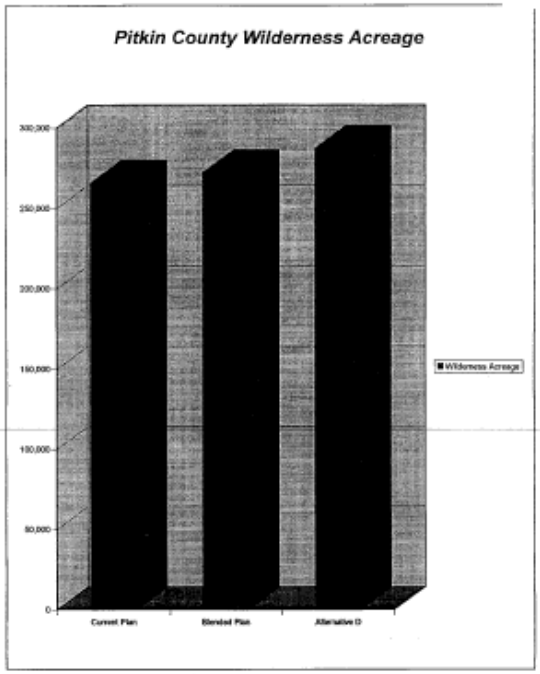
W11990



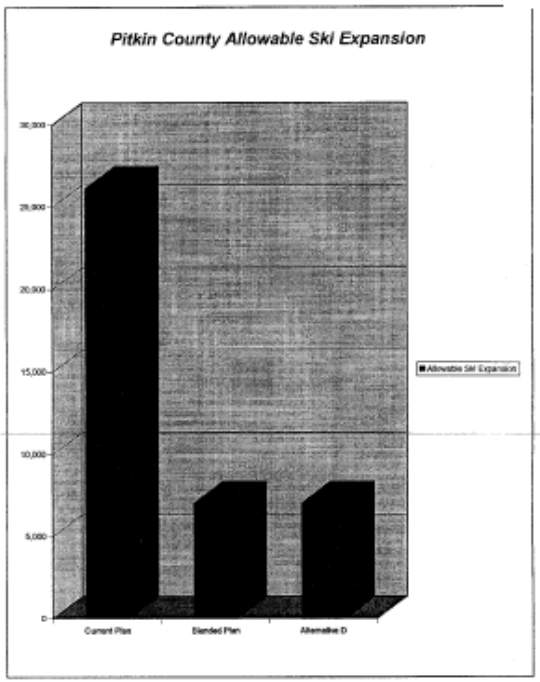
W11990



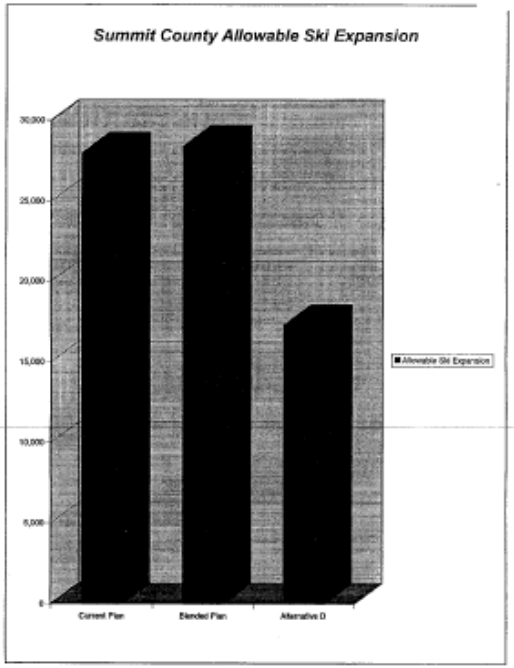
W11990



W11990



W11990



W11990

Travel Management

Attached are the Blended Plan prescriptions for each inventoried road, trail, and way. My team has done their very best, but the White River National Forest road and trail inventory, while a great improvement over past information, still contains inaccuracies and omissions. Some additional trails are added in, and are noted in each case. The inventory map is also difficult to read. We have made an intensive effort to accurately reflect the input from the Colorado Division of Wildlife, motorized road and trail interests, and mountain bike enthusiasts. Nonetheless, it is entirely possible that this proposal contains minor inaccuracies and omissions. As such, it is hoped that White River National Forest District Rangers will work with their user groups to refine the travel plan to one which will provide a balance of uses with opportunities for all.

H - Introduction

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code	
ASPEN RANGER DISTRICT			
FDR 103.2	Lenado	1	
FDR 106.1A	Lincoln Gulch Campground	1	
FDR 106.1B	Portal Campground	1	
FDR 107.1	New York Creek Trailhead	1	
FDR 108.1	Difficult Campground	1	
FDR 109.1	Weller Lake Campground	1	
FDR 110.1	Lost Man Campground	1	
FDR 112.1	Grottos Parking Lot	1	
FDR 114.1	Braille Trailhead	1	
FDR 115.1W	Richmond Overlook	1	
FDR 116.1	Anderson Lake	1	
FDR 117.1	Ruby Mine	1	
FDR 119.1	Snowmass Falls Ranch	1	
FDR 120.1	Independence Gravel Pit	64	
FDR 121.1	Cooper Basin	1	
FDR 121.2	Cooper Basin	51	
FDR 121.2A	Lindley Cabin	51	
FDR 123.2T	Gold Hill Tie	1	
FDR 123.2W	Gold Hill	1	
FDR 125.1A	Silver Bar Campground	1	
FDR 125.1B	Silver Bell Campground	1	
FDR 125.1C	Silver Queen Campground	1	
FDR 125.1D	East Maroon Trailhead	1	
FDR 125.1E	Maroon Lake	1	
FDR 127.1	Cathedral Lake	1	
FDR 129.1	Montezuma	1	
FDR 130.3A	Red Mountain Community Site	9	
FDT 130.3C	Bald Knob	51	
FDR 131.1N	Warren Lake North	9	
FDR 131.1S	Warren Lake South	9	
FDR 141.1	Rev. Smith	1	
FDR 15L1W	Pearl Pass Spur	1	
FDR 206.1	*Red Mtn. Connection - Four Corners*	9	*(not in Appendix O of DEIS)*
FDR 316.1	Capitol Creek	1	
FDR 317.1	Hay Park	1	
FDR 508.1	Kobey Park	1	
FDR 508.2R	Collins	51	
FDR 508.2S	Collins	51	
FDR 508.3	Link	1	
FDR 513.1	Red Canyon	1	
FDR 513.1C		51	
FDR 513.1D		51	
FDR 513.1E	Red Canyon Spur #5	51	
FDR 513.1F		51	
FDR 513.1H		51	
FDR 513.1M		51	
FDR 523.4	Lower Red Canyon	1	
FDR 523.4A		1	
FDR 523.4B		1	
FDR 523.4C		9	
FDR 534.1	Red Rim	1	
FDR 534.2	Red Rim	9	
FDR 534.2D	Red Rim #4	1	
FDR 534.2E		9	

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 534.2F	Triangle Park	9
FDR 534.2G		64
FDR 540.1	Little Woody	1
Way 103W.1F	Cliff Ways	64
Way 103W.1G	Cliff Ways	64
Way 103W.1H	Cliff Ways	64
Way 103W.1J	Cliff Ways	64
Way 103W.1K	Cliff Ways	64
Way 103W.1Y		64
Way 103W.2X	Old Larkspur Mountain Road	44
Way 103W.2Y		44
Way 103W.2Z		44
Way 131W.1H	Smuggler Mountain Trail	44
Way 133W.1A	Collin Spur #1	51
Way 133W.1B	Collins Spur #2	51
Way 133W.1C	Collins Spur #3	51
Way 133W.1D	Collins Spur #4	51
Way 134W.1	Independence Fence	69
FDT 1927.2	Spruce Creek	64
FDT 1933.1	Red Canyon	51
FDT 1940.2	South Fork Pass	64
FDT 1957.2	Hay Park	51
FDT 1957.2B	Buzzard Basin	51
FDT 1957.2H	Hay Park	51
Way 1959.1	Johnny Draw	64
FDT 1960.1	Hell Roaring	64
FDT 1960.1A	Williams Lake	64
FDT 1961.2	Capitol Creek	64
FDT 1961.2T	Lower Capitol Trail	64
FDT 1962.1	Nicholson Creek	64
Way 1962.1N	Nickelson Creek	64
FDT 1963.1	Ditch	64
FDT 1965.1	Nicholson Valley	64
FDT 1966.1	Nicholson Cutoff	64
FDT 1970.2	West Maroon	64
FDT 1973.2	Geneva Lake	64
FDT 1975.1	Maroon-Snowmass	64
FDT 1975.1M		64
FDT 1975.2	West Maroon Portal Trail	64
FDT 1976.1	Blake Trail	51
FDT 1976.2	Blake Trail	51
FDT 1976.3	Blake Trail	51
FDT 1977.1	East Snowmass	64
FDT 1978.1	Willow Lake	64
FDT 1979.1	Linkins Lake	64
Way 1979.1T	Terrell Lake	64
FDT 1980.1	Government	51
FDT 1980.1N	Anaerobic Nightmare	51
FDT 1981.1	Conundrum Creek	64
FDT 1982.1	Maroon Creek	64
FDT 1982.1W	West Maroon Portal Link Trail	51
FDT 1982.2	Lower Maroon Creek	51
FDT 1983.1	East Maroon	64
FDT 1983.1A	Copper Pass Spur	64
FDT 1984.1	Cathedral Lake	64
FDT 1984.1A	Electric Pass	64

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 1985.1	American Lake	64
FDT 1986.1	Weller Lake	64
FDT 1986.1A	Weller Scenic Trail	64
FDT 1987.1	Sunnyside	51
FDT 1987.2	Sunnyside Plunge	51
FDT 1988.1	Shadyside	51
FDT 1989.1	Four Corners	44
FDT 1989.2	Four Corners	44
FDT 1989.3	Four Corners	44
FDT 1990.1	Grizzly Lake	64
FDT 1991.1	Petroleum Lake	51
FDT 1991.1A	Anderson Lake	51
FDT 1992.3	Hunter Valley	51
FDT 1992.3A	South Spur	51
FDT 1992.3B	North Spur	51
FDT 1993.1	Midway	64
FDT 1993.2	Midway Trail (Non-Wilderness)	64
FDT 1993.2	Castle Creek Valley	51
FDT 1994.1	Woody Creek	64
FDT 1994.1X	Slab Park	64
FDT 1995.1	Braille Trail	64
FDT 1996.1	Lost Man Loop	64
Way 1996.1J	Jack Creek	64
Way 1996.1S	Scott Lake	64
FDT 1997.1	Roaring Fork Discovery	64
FDT 1998.1	Hannon Creek	44
FDT 1998.1A	Hannon Creek Spur A	44
FDT 1998.1B	Hannon Creek Spur B	44
FDT 2146.1	Difficult Creek	51
FDT 2171.1	Stage Coach #1	51
FDT 2172.1	Upper Ditch Trail	51
FDT 2172.1M	Lower Ditch Trail	51
FDT 2177.1	Brooklyn Gulch	64
FDT 2179.1	Gullinger	64
FDT 2181.1	Grottos	51
FDT 2182.1	New York Creek	64
FDT 2184.1	Johnson Creek	51
FDT 2185.1	Tabor Creek	64
FDT 2186.4	Arbaney-Kittle	44
FDT 2187.1	West Snowmass	64
Way 2188.1	Dry Woody Creek	51
FDT 2189.1	Sloane Cutoff	44
Way 2189.1A	Red Canyon	44
FDT 2189.1B	Sloane Cutoff Spur B	44
Way 2190.1	Pack Trail	64
FDT 2190.1M	Warren Lakes	64
Way 2190.2	Warren/Midway Trail	69
Way 2190.3	Upper Hunter Trail	69
Way 2191.1	Mosquito Park	69
FDT 2192.1	Gunsight Pass	64
FDT 2194.1	Hunter Creek	51
FDT 2194.2	Hunter Creek	64
FDT 2197.1	Scenic	64
FDT 2198.2	McFarlane Creek	64
Way 2199.1	Bowman Creek	69
Way 508W.1A	Casaday Ways	51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 508W.1B	Casaday Ways	51
Way 508W.1C	Casaday Ways	51
Way 508W.1D	Casaday Ways	51
Way 508W.1E	Casaday Ways	51
Way 508W.1F	Casaday Ways	51
Way 508W.1G	Casaday Ways	51
Way 508W.1H	Casaday Ways	51
Way 508W.1J	Casaday Ways	51
Way 508W.1K	Casaday Ways	51
Way 508W.2A		51
Way 508W.2B		51
Way 508W.2E	Knob Ways	51
Way 508W.2F		51
Way 508W.2G	Knob Ways	51
Way 508W.2H		51
Way 508W.2J		51
Way 508W.3A		51
Way 508W.3B		51
Way 508W.3C		51
Way 508W.3D		51
Way 508W.3E		51
Way 508W.3F		51
Way 508W.4A		51
Way 508W.4B		51
Way 508W.4H		51
Way 513W.1L		51
Way 513W.1N		51
Way 513W.1R	Mid Kobey Ways	51
Way 513W.1S	Mid Kobey Ways	51
Way 523W.4D		9
Way 523W.4E		51
Way 523W.4F		51
Way 526W.1E	Fork Ways	64
Way 526W.1F	Section 14	64
Way 526W.1G	Section 14	64
Way 526W.1H	Section 14	64
Way 526W.1J	Section 14	64
Way 526W.1K	Section 14	64
Way 526W.1W	Miller Way	64
Way 534W.2A	Red Rim Spur #1	51
Way 534W.2B	Red Rim Spur #2	51
Way 534W.2C	Red Rim #3	51
Way 534W.2M	Triangle Peak Trail	51
Way 540W.1A		51
Way 540W.1B		51
Way 540W.1C		51
Way 540W.1D		51
Way 540W.1E		51
Way 540W.1F		51
Way 540W.1G		51
Way 1506W.1H	Kobey Peak	51
Way 1964W.1A	Electric Pass West	64
Way 1999W.1	Collins Creek	51
Way 2178W.1	Sioux Lake	64
Way 2183W.1	Truro Creek	64
Way 2198W.1C		44

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 2195W.1F		44
P-20	Sloan Peak - Holland Hills via Arbaney Gulch	44 (not in Appendix O of DEIS)
P-19	Sloan Peak - Cow Camp	1 (not in Appendix O of DEIS)
BLANCO RANGER DISTRICT		
FDR 8.2A	North Fork Sheep Corral	1
FDR 8.2J	Ripple Creek Dispersed	1
FDR 8.2L		1
FDR 8.2N	Lily Pond Trailhead	1
FDR 8.2O	Gravel Pit Road	51
FDR 8.2R	Chinese Wall / Pagoda Trailhead	1
FDR 8.2S	Dispersed Camp Summit	1
FDR 8.2T	Ripple Creek Timber	51
FDR 8.2Z	Ripple Summit	51
FDR 10.2	South Fork	1
FDR 10.2A	South Fork Campground	1
FDR 10.2B	South Fork Campground	1
FDR 12.1T	Tims Road	51
FDR 12.2	Marvine	1
FDR 12.2A	East Marvine Campground	1
FDR 12.2B	Marvine Campground	1
FDR 53.2	Morapos	1
FDR 53.2A		1
FDR 54.2	North Elk Creek	69
FDR 75.2A	Papoose Creek SHG	1
FDR 200.1	Lost Creek Ranger Station	1
FDR 200.1C	Holandras Access	1
FDR 202.1	North Fork Campground	1
FDR 204.1	Ripple Creek Cow Camp	1
FDR 205.1	Trappers Lake	1
FDR 205.2D		1
FDR 205.2F	Trappers Lake Lodge	1
FDR 205.2H	Dump Road	1
FDR 205.2P		1
FDR 205.2R	Bucks Campground	1
FDR 205.2S	Shepherds Rim Campground	1
FDR 205.2T	Trapline Campground	1
FDR 205.2V	Cutthroat Campground	1
FDR 206.1	Mirror Lake Lot	1
FDR 206.1A	Dump Road	1
FDR 207.1	Himes Peak Campground	1
FDR 208.1	Blue Lake SHG	1
FDR 209.1	Trappers Outlet	1
FDR 210.1	Mud Springs/Bear Gulch	1
FDR 211.1	Bar H-L	1
FDR 211.1C	Corral Road	1
FDR 211.1D	Model A	1
FDR 211.1E	Camp	1
FDR 211.1F	Triangle Park	1
FDR 211.1T		1
FDR 211.1X	Stock Pond Road	1
FDR 211.3	Bar H-L	1
FDR 211.4	Bar H-L	1
FDR 211.4A	Gooseberry Aspen Road	1

H-6

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 212.1	Widow Springs	1
FDR 212.1G	Whiskey Gulch	1
FDR 213.1	Dynamite Lake	1
FDR 213.2	Dynamite Lake	1
FDR 213.3	Dynamite Lake	1
FDR 214.1	Wear Park	1
FDR 214.2	Wear Park	1
FDR 215.1	East Miller	1
FDR 216.1	Wells Ridge	1
FDR 216.2	Wells Ridge	1
FDR 217.1	Middle Mountain	1
FDR 217.2	Middle Mountain	1
FDR 217.2R	Middle Mountain Alt	51
FDR 217.2S	Sykes Gulch	1
FDR 218.1	Middle Miller	1
FDR 218.1A	Miller Creek Cowcamp	1
FDR 219.1	Howey Resvr	1
FDR 220.1	East Fork Flag Creek	1
FDR 220.2	East Fork Flag Creek	1
FDR 221.1	Upper West Miller	1
FDR 221.2	Upper West Miller	1
FDR 223.1	Bloodsworth	1
FDR 223.1A	West Miller Ridge	1
FDR 223.1B	West Miller Ridge South	51
FDR 225.1	Machine Spring	1
FDR 226.1		1
FDR 230.1	Long Park	1
FDR 231.1	Trough Camp	1
FDR 232.1	Hill Creek	1
FDR 234.1	Missouri Camp	1
FDR 235.1	Cattle Creek	1
FDR 236.1	East Beaver Ridge	1
FDR 238.1	Ute Creek SHG	51
FDR 239.1	Ripple Creek Overlook	1
FDR 240.1	Sterry Lake	1
FDR 241.1	Dobbs Resvr	1
FDR 241.1A	Dobbs Res - Private Access	1
FDR 241.1C	Green Street Access	51
FDR 241.1G	Dobbs Reservoir Closed	51
FDR 241.1M	Dobbs Cutoff	51
FDR 241.2	Dobbs Reservoir	51
FDR 243.1	Big Ridge	1
FDR 245.5	New Castle - Buford	2
FDR 245.6	New Castle - Buford	2
FDR 246.1	Burro Mountain	1
FDR 248.1	Elk Ridge	1
FDR 248.1A		1
FDR 250.2	Yellow Jacket / East Beaver	1
FDR 251.1	Yellow Jacket Ridge Road	1
FDR 251.2	Yellow Jacket Ridge Road	51
FDR 252.1	Aldrich-Wilson Park	1
FDR 252.1A	Aldrich Lakes	1
FDR 252.1B	Grade Creek	1
FDR 252.1C	Aldrich - Timber Spur	1
FDR 253.1	Martin Ridge Access	1
FDR 253.1A	Martin Ridge Spur	1

H-7

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 254.1	Lantern Ridge	1
FDR 255.1	Stove Ridge	1
FDR 256.1	Cold Springs	1
FDR 258.1	Elbow Park	1
FDR 259.1	Ditch Cabin	1
FDR 260.1	Sawmill Mountain	1
FDR 261.1	Uranium Peak	1
FDR 261.1M	Uranium Peak Cutoff	51
FDR 262.1	Sawmill Cutoff	51
FDR 263.1	Stove Gulch	1
FDR 265.1	Columbine	1
FDR 266.1	Lodge Pole	1
FDR 266.1A		1
FDR 267.1	West Coal Creek	1
FDR 267.1C	Coal Creek Ridge	1
FDR 268.1	Sawmill Creek	1
FDR 268.2	Sawmill Creek	1
FDR 268.3	Sawmill Creek	1
FDR 269.1	Cottonwood Creek	1
FDR 270.1	Marci Camp	1
FDR 271.1	Pole Patch	1
FDR 272.1	Goff Creek	1
FDR 273.1	Ellison Mtn	1
FDR 276.1	North Beaver	1
FDR 277.1	South Beaver	1
FDR 278.1	Gooseberry Creek	1
FDR 280.1	Fawn Creek	1
FDR 281.1	TV tower	1
FDR 281.2	TV tower	1
FDR 282.1		1
FDR 285.1	Fawn Creek Ridge	1
FDR 289.1	Upper East Beaver	1
FDR 289.1A	Upper E. Beaver Cutoff	1
FDR 290.1	Moeller Creek	1
FDR 291.1	Log Spring	1
FDR 292.1	Pattison Park	1
FDR 293.1	Lost Park	1
FDR 295.1	Hahn Creek	51
FDR 297.1	Sleepy Cat Admin.	51
FDR 299.1	Sleepy Cat Peak	1
FDR 839.2	Big Mountain	1
FDR 839.3	Big Mountain	1
FDT 1114.1	Salt Park	51
FDT 1195.1	Slide Creek	51
FDT 1800.1	Wilson Mesa / Sleepy Cat Peak	51
FDT 1800.1A	Snell Rock Ridge	51
FDT 1800.1B	Snell Rock Ridge	51
Way 1800.1K	Konopic Cutoff	51
FDT 1800.1L	Lynch Creek	51
FDT 1800.2	Sleepy Cat Peak	51
FDT 1800.4	Sleepy Cat Peak	51
FDT 1801.1	Wymore Lake	51
FDT 1802.1	Deer Lake	64
FDT 1803.1	Chinese Wall	64
FDT 1803.2	Chinese Wall	64
FDT 1803.3	Chinese Wall	64

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 1803.3A	Devils Causeway	64
FDT 1804.1	Pagoda Lake	35
FDT 1804.1P	Pagoda Lake Access	35
FDT 1805.1	Lost Park	51
FDT 1805.1A	East Lost Park	51
FDT 1806.1	Konopic Reservoir	51
FDT 1807.1	Milk Creek / Horse Ridge	51
FDT 1807.2A	Three Points	51
FDT 1807.2B		51
FDT 1807.2C	Three Points Cutoff	51
FDT 1807.3	Milk Creek / Horse Ridge	51
FDT 1808.1	Lost Creek	51
FDT 1809.1	Long Park	45
FDT 1809.1A	Long Park	35
FDT 1809.2	Long Park	35
FDT 1810.1	Snell Creek	40
FDT 1811.1	Picket Pin Lily Pond	64
FDT 1811.2	Picket Pin Lily Pond	64
FDT 1811.3	Picket Pin Lily Pond	64
FDT 1812.1	Lost Lakes	64
FDT 1813.1	Skinny Fish Lake	64
FDT 1813.2	Skinny Fish Lake	64
FDT 1813.2A	McGinnis Lake	64
FDT 1814.1	Little Trappers	64
FDT 1815.1	Arthur H. Carhart	68
FDT 1815.2	Arthur H. Carhart	64
FDT 1815.2B	Scotts Bay	64
FDT 1815.2C	Wall Lake Cutoff	64
FDT 1815.3	Arthur H. Carhart	64
FDT 1815.3A	Scotts Lake	64
FDT 1816.1	Trappers Lake	64
FDT 1816.1A	Trappers Lake	64
FDT 1816.1B	Shingle Lake	64
FDT 1817.1	W. Mountain	64
FDT 1818.1	Wall Lake	64
FDT 1818.2	Wall Lake	64
FDT 1819.1	Big Fish	64
FDT 1819.2	Big Fish	64
FDT 1820.1	Big Ridge	51
FDT 1820.1A	Big Ridge Cutoff	51
FDT 1820.2	Big Ridge	64
FDT 1821.1	Mirror Lake	64
FDT 1821.2	Mirror Lake	64
Way 1821.3P	Mirror Lake Trail	64
Way 1821.3W	Paradise Trail	64
Way 1821.4P	Mirror Lake Trail	64
Way 1821.4W	Paradise Trail	64
FDT 1822.1	East Marvine	64
FDT 1822.2	East Marvine	64
FDT 1822.2A	Mary Loch Lake	64
FDT 1822.2B	Big Marvine	64
FDT 1822.3	East Marvine	64
FDT 1823.1	Marvine	64
FDT 1823.2	Marvine	64
FDT 1823.2A	Pine Isle Lake	64
FDT 1824.1	Ute Creek	64

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 1824.2	Ute Creek	64
FDT 1825.1	Oyster Lakes	64
FDT 1825.2	Oyster Lakes	64
FDT 1825.3	Oyster Lakes	64
FDT 1826.1	Peltier Lake	64
FDT 1827.1	South Fork	64
FDT 1827.2	South Fork	64
FDT 1827.3	South Fork	64
FDT 1827.3L	South Fork	64
FDT 1827.4	South Fork	64
FDT 1828.1	Lost Solar	64
FDT 1828.2	Lost Solar	64
FDT 1829.1	Park Creek	64
FDT 1830.1	Nichols Creek	64
FDT 1830.1H	Horseshoe Lake	64
FDT 1831.1	Cliff Lakes	1
FDT 1833.1	Gilley Lake	51
FDT 1834.1	Spring Cave	51
FDT 1835.1	East Fork North Elk	28
FDT 1836.1	Prospect Draw	51
FDT 1837.1	East Miller Creek	28
FDT 1837.2	East Miller Creek	28
FDT 1838.1	Middle Miller Creek	28
FDT 1838.2	Middle Miller Creek	28
FDT 1839.1	Middle Mountain	28
FDT 1842.2	Island Lakes	64
FDT 1857.2	South Derby	64
FDT 1862.1	Wild Cow Park	51
FDT 1862.2	Wild Cow Park	64
FDT 1868.1	West Marvine	64
FDT 1868.2	West Marvine	64
FDT 1877.1	Himes Peak	64
FDT 1877.2	Himes Peak	64
Way 211W.4E		51
Way 211W.4F		51
Way 211W.4G		51
Way 211W.4H	Janes Spring	51
Way 211W.4K		51
Way 217W.1A	Middle Miller	28
Way 217W.1B		28
FDR 221W.1B		1
Way 221W.1C	West Miller Cutoff	28
FDR 221W.2A		1
FDT 2236.1	East Beaver Ridge	28
FDT 2240.1	Sterry Lake	28
FDT 2242.1	Sawmill Creek	35
FDT 2243.1	Baloon Lake	35
FDT 2248.1	Papoose Creek	64
FDT 2255.1	Hill Creek	64
FDT 2255.2	Hill Creek	64
FDT 2256.1	Fowler Creek	64
FDT 2256.2	Fowler Creek	64
FDT 2257.1	Fowler Bench	64
FDT 2257.2	Fowler Bench	64
FDT 2259.1	Doe Creek / Stock Driveway	64
FDT 2261.1	Duck Lake	51

H-10

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 2261.1A	Duck Lake	51
FDT 2261.1B	Duck Lake	64
FDT 2262.1	Boulder Lake	64
FDT 2263.1	Lake of the Woods	64
FDT 2263.2	Lake of the Woods	64
FDT 2264.1	Anderson Reservoir	64
FDT 2264.2	Anderson Reservoir	64
FDT 2265.1	Big Beaver Basin	28
FDT 2265.2	Big Beaver Creek	28
FDT 2269.1	Turret / Crescent	64
FDT 2271.1	Pole Patch	28
FDT 2272.1	Big Beaver Basin	28
FDT 2272.2	Big Beaver Basin	28
FDT 2273.1	Ellison Mountain	28
FDT 2277.1	East Beaver	28
FDT 2279.1	Big Lick	28
FDT 2289.1	Columbine	28
FDT 2297.1	Sleepy Cat Administrative	51
FDR 245W.5C		1
FDR 245W.5F		1
FDR 245W.5G		1
FDR 601W.1Y		1
FDT 202003.1	Range Trail	64
FDT 207007.1	Range Trail	64
FDT 207009.1	Range Trail	64

SOPRIS RANGER DISTRICT

FDR 105.2	Frylingpan	1
FDR 105.3A	Hell Gate	1
FDR 105.3C	Cabin	1
FDR 105.3S	Sellar Park	51
FDR 105.4A	Horseshoe Bend	1
FDR 105.4B	Chapman Campground	1
FDR 105.4C	Freeman Picnic Ground	1
FDR 105.4D	Chapman Group Campground	1
FDR 105.4N	Nast East Lake	1
FDR 105.4P	Horseshoe Bend	1
FDR 105.4Q	105 Spur	1
FDR 105.4S	Little Deadman	1
FDR 105.4T	Little Deadman	51
FDR 105.5R	Red Hill	1
FDR 105.6B	Rocky Fork Day Use Area	1
FDR 105.6C	Rocky Fork Day Use Area	1
FDR 105.6D		1
FDR 300.1P	Pipeline	51
FDR 300.2B	Sunlight Service Road B	51
FDR 300.2C	Sunlight Service Road C	51
FDR 300.2D	Old Fourmile	51
FDR 300.2E	Grizzly Road	51
FDR 300.2F	Segundo Service	51
FDR 300.3	Fourmile	36
FDR 300.3G	Gas Well	1
Way 300.3J	Old Fourmile	51
FDR 300.3N	Hilton	1
FDR 300.3R	Texas City	1

H-11

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 300.4	Fourmile	1
FDR 300.4A	Slides	51
FDR 300.4C		36
FDR 300.4K	Well No. 5	16
FDR 300.4M	Well No. 8	16
FDR 300.5	Fourmile	1
FDR 300.6	Fourmile	51
FDR 300.6P	Rock Slide	51
FDR 300	*Haystack Gate, at base of Twin Peaks*	*6 (not in Appendix O of DEIS)*
FDR 301.1	Beaver Pond	51
FDR 301.2	Beaver Pond	51
FDR 301.2B	Beaver Spur No 2	51
FDR 301.2C	Beaver Spur No. 3	51
FDR 302.1	Baylor Park	1
FDR 303.2	Yank Creek	51
FDR 304.1	North Thompson	1
FDR 305.2A	Thompson GS	1
FDR 305.2B	Parsnip Flat	1
FDR 306.1	Middle Thompson	1
FDR 307	Coal Basin	1
FDR 307.1	Coal Basin	51
FDR 307.1A	Coal Basin Spur	51
FDR 307.1B	Mine No. 3	51
FDR 307.1C	Mine No. 4	51
FDR 307.1D	Mine No. 5	51
FDR 307.1E	Bear Creek Road	51
FDR 307.1F	Mine #6	51
FDR 308.1A	Redstone Campground North	1
FDR 308.1B	Redstone Campground South	1
FDR 310.1	Avalanche Campground	17
FDR 310.1A	Jane Way Campground	17
FDR 310.1B	Bull Dog	17
FDR 310.1C	Sheep Road	17
FDR 310.1G	Janeway Gravel Pit	17
FDR 311.1	Dinkle Lake	1
FDR 311.2	Dinkle Lake	1
FDR 312.1	Lower Mid	51
FDR 312.1A	Lower Mid Spur	51
FDR 313.1	Nettel Creek	51
FDR 314.1A	Bogan Flats Campground	1
FDR 314.1B	Lily Lake GS	51
FDR 314.1C	Bogan Flat Group	1
FDR 314.2A	Marble Ski	51
FDR 314.3	Crystal River	1
FDR 314.3N	Baroni Mine	1
FDR 314.3P	North Pole Basin	1
FDR 314.3R		1
FDR 315.1	Lead King Basin	1
FDR 315.2L		1
FDR 317.1	Paradise Basin	1
FDR 317.1A	Schofield Trail Road	1
FDR 317.1C	Galena Lake	1
FDR 318.1	Sunlight Peak	1
FDR 318.1N		51
FDR 318.2	Sunlight Peak	51
FDR 320.1	Park Creek	51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 320.1A	Park Creek Spur #1	51
FDR 320.1B	Park Creek Spur #2	51
FDR 320.1C	Mancon Park	51
FDR 320.2	Park Creek	51
FDR 321.1	Twin Peaks	1
FDR 321.1B	Well No. 9	1
FDR 327.1	Basalt Admin Site	1
FDR 329.1	Wolf Creek	1
FDR 329.1A	Wolf Creek Spur	36
FDR 332.1	Lower Clearcut	51
FDR 400.3	Eagle - Thomasville	1
FDR 408.1B	Bear Creek	1
FDR 408.2	Hubbard Cave	1
FDR 408.3	Deadman	1
FDR 420.1	Coyote	51
FDR 420.1A	Coyote Spur	51
FDR 431.1N	Nowhere	1
FDR 431.2	Powerline - Crooked Creek	1
FDR 464.1	Drill Hole	1
FDR 501.1A	Elk Wallow Campground	1
FDR 502.1	Sellar Lake	1
FDR 502.1A	Diemer Lake	1
FDR 502.1B	Powerline-Diemer	1
FDR 504.1	South Fork	1
FDR 504.1B	Recreation residence	1
FDR 504.1C	Recreation residence	1
FDR 504.1D	Twin Meadows	1
FDR 504.1E	Chapman Creek	1
FDR 505.1	Granite	1
FDR 506.1	Burnt Mountain	1
FDR 506.1D	Burnt Mtn #QGD	51
FDR 506.1F	Burnt Mtn #F	51
FDR 506.1G	Burnt Mtn #G	51
FDR 506.1M	Montgomery Flats	1
FDR 506.2	Burnt Mountain	1
FDR 506.2D		1
FDR 506.2E		1
FDR 506.2L		1
FDR 507.1	Woods Lake	1
FDR 508.2	Kobey Park	1
FDR 508.2R	Collins	1
FDR 508.2S	Collins	1
FDR 509.1	Cattle Creek	1
FDR 509.2	Cattle Creek	1
FDR 509.2A	Basalt Spur #A	51
FDR 509.2B	Basalt #B	51
FDR 509.2N	North Fork Cattle Creek	1
FDR 510.3	Taylor Creek	1,64
FDR 510.3T	Taylor Creek Spur	1
FDR 511	Maud Millie Mattie	1
FDR 511.1A	John Marina	1
FDR 511.1B	Little Maud Campground	1
FDR 512.1	Jakeman	1
FDR 512.1A	Jakeman Spur No. 3	51
FDR 512.1B	Jakeman Spur No. 4	51
FDR 512.2	Jakeman	51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 513.1A		1
FDR 513.1B		1
FDR 513.1G		51
FDR 513.1J		51
FDR 514.2	Red Table	1
FDR 514.2M		1
FDR 517.1	Huntsman Ridge	1
FDR 518.1	Sellar Creek	51
FDR 518.1P	Powerline	51
FDR 519.1	Spring Creek	1
FDR 520.1	Deadman	1
FDR 520.1B		9
FDR 520.1C	Little Deadman Too	51
FDR 520.2	Deadman	1
FDR 520.3	Deadman	9
FDR 521.1	Meredith	1
FDR 522.1	Miller	51
FDR 522.1A	Dearhammer Campground	1
FDR 522.1B	Meredith	1
FDR 522.1Y	Cabin Cutoff	1
FDR 523.1	Red Table Log #A	9
FDR 523.1A	Red Table Log #B	9
FDR 523.1B	Red Table Log #C	9
FDR 524.1	Basalt Mountain	36
FDR 524.1A	Mill Creek Rim	51
FDR 524.1B	High Park	51
FDR 524.1C	Basalt #C	51
FDR 526.1	Yeckel	1
FDR 526.1A	Porphry Mountain Spur	1
FDR 526.1B	Larkspur Mountain Spur	1
FDR 527.1L	Betty Bear Hut	1
FDR 527.2	Ivanhoe Lake	1
FDR 528.1	Rocky Fork	1
FDR 528.1A	Rocky Fork Spur	1
FDR 528.1D	Rocky Fork Spur	1
FDR 528.1E		1
FDR 528.1F	Rocky Fork Spur	1
FDR 528.1G	Rocky Fork Spur	1
FDR 530.1	Biglow	1
FDR 532.1	Powerline - Cunningham	1
FDR 533.1	Jakeman Spur No. 2	51
FDR 533.1A	Jakeman Landing No 2	51
FDR 535.2A	Green Lake	1
FDR 535.2B	Spring	1
FDR 536.1	Freeman Road	1
FDR 536.1A		51
FDR 536.2	Freeman Road	1
FDR 537.2	Kelly Lake	1
FDR 537.2A	Kelly Lake Spur	1
FDR 538.1	Middle Cunningham	1
FDR 538.1M	Cunningham Portal	1
FDR 539.1	Rocky Fork Spur #4	1
FDR 539.1A	Rocky Fork Spur #5	1
FDR 539.1B	Rocky Fork Spur #6	1
FDR 542.1	Lookout Mountain	1
FDR 566.		1

H-14

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 745.1B	Huntsman Ridge	51
FDR 800.3	West Divide	1
FDR 105W.2A	Powerline Road	51
Way 117W.2	Way	51
Way 133W.1B	Sweet Jesup Ditch	51
FDT 1907.1	Lily Pad Lake	51
FDT 1908.1	Montgomery Flats	51
FDT 1909.1	Cattle Creek	36
FDT 1910.1	Hubbard Cave	1
FDT 1911.1	Basalt Mountain	36
FDT 1912.1	Red Hill	44
Way 1913.1	North Fork	36
FDT 1913.2	North Fork	36
FDT 1915.1	Eagle Lake	64
FDT 1915.2	Eagle Lake	64
FDT 1916.1	Josephine Lake	64
FDT 1917.1	Tellurium Lake	64
FDT 1917.2		64
FDT 1918.1	Savage Lakes	64
FDT 1919.1	Lyle Lake	64
FDT 1920.1	Chapman Gulch	64
FDT 1921.1	Fryingpan Lakes	64
FDT 1921.1A	Fryingpan River	64
FDT 1922.1	Granite Lake	64
FDT 1923.1	Chapman	64
FDT 1925.1	Sawyer Cutoff	51
FDT 1925.2A	Chapman Interpretive	51
FDT 1926.1	Sawyer Lake	64
FDT 1927.1	Aspen - Norrie	64
FDT 1928.1	Woods Lake - Slim Jim	64
FDT 1930.1		44
FDT 1931.1	Rocky Fork	44
FDT 1940.1	South Fork Pass	64
FDT 1943.1	Pond Creek	64
FDT 1944.1	Carter Lake	64
FDT 1945.1	Last Chance	64
FDT 1948.1	Perham Creek	51
FDT 1950.1	Middle Thompson	48
FDT 1951.1	South Branch	51
FDT 1952.1	Braderich / South Thompson	51
FDT 1953.1	Dexter Park	51
FDT 1957.1	Hay Park	51
Way 1957.1B		51
Way 1957.1C	West Sopris Loop	64
FDT 1957.2A	Hay Park Way	51
FDT 1958.1	Mount Sopris	64
FDT 1959.1	Avalanche / Silver Creek	64
FDT 1959.1L	Avalanche Lake	64
FDT 1959.2	Avalanche / Silver Creek	64
FDT 1960.2	Hell Roaring	64
FDT 1961.1	Capitol Creek	64
FDT 1963.1	East Creek / Gift Creek	64
FDT 1964.1	Lily Lake	64
FDT 1964.2	Lily Lake	60
FDT 1965.1	Arkansas Mountain	64
FDT 1966.1	Placita	64

H-15

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 1967.1	North Lost	64
FDT 1968.1	Raspberry Creek	64
FDT 1969.1	Anthracite Pass	64
FDT 1970.1	West Maroon Pass	64
FDT 1971.1	Carbonate Creek / Buckskin	64
FDT 1973.1	Geneva Lake	64
FDT 1974.1	North Fork	64
FDT 1976.1	North Fork Cutoff	64
FDT 1977.1	Bogan Trail	51
FDT 2083.1	Yule Pass	64
Way 2090.3W	Lower Dipsy Doodle	56
Way 2090.4W	Upper Dipsy Doodle	56
Way 2090.5W	Upper Babbish Loop	56
Way 2090.6W	Babbish Express	56
Way 2090.7W	Upper Freeman Creek	56
FDT 2092.1	Marion Gulch	51
Way 2092.1A	Yank Creek	51
FDT 2093.1	Lake Ridge Lakes	51
FDT 2186.2	Arbaney - Kittle	51
FDT 2186.3	Arbaney - Kittle	51
FDT 2190.1	Otto Creek	51
Way 300W.4E		51
FDR 300W.4F		51
FDR 300W.4G		36
FDR 301W.1A		1
FDR 301W.2A		51
Way 302W.1P	Baylor Pipeline	51
Way 307W.1G		51
Way 307W.1H		51
Way 307W.1J		51
Way 307W.1K		51
Way 307W.1L		51
Way 307W.1N		51
Way 311W.1A	Ditch Road	51
Way 314W.2C	Skyline Mine	51
FDR 329W.2		14
FDR 400W.3B	Cow Camp	1
FDR 400W.3C	Crooked Creek Spur	51
FDR 464W.1		1
FDR 502W.1C	Sellar Logging Road	1
FDR 502W.2S	South Sellar	1
FDR 502W.2T	North Sellar	1
FDR 508W.2M	Spur	1
FDR 508W.2C		1
FDR 508W.2D		1
Way 509W.2B	Way	51
FDR 510W.2H	Red Table Logging Road	36
FDR 513W.1Q		1
Way 513W.1V		51
Way 513W.2	Red Canyon	51
FDR 514W.2A	Red Table Logging Road	51
FDR 514W.2B	Logging Road	51
FDR 514W.2C	Red Table Logging Spur	51
FDR 514W.2D	Red Table Logging Road	1
FDR 514W.2E	Logging Spur Road	1
FDR 514W.2F	Red Table Logging Road	51

H-16

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 514W.2G	Red Table Logging Road	51
FDR 519W.2	Suicide	51
FDR 524W.1T		51
Way 524W.1W		51
FDR 526W.1B	Fork Ways	1
FDR 526W.1C	Fork Ways	1
FDR 526W.1D	Section 14	1
FDR 526W.1M		1
FDR 527W.3	Hagerman Tunnel	51
FDR 528W.1C		1
FDR 528W.1H		1
FDR 528W.1J		1
FDR 105.1.4B	Chapman Dam Access	1
FDR 105.2.4B	Chapman Spur A	1
FDR 105.3.4B	Chapman Loop A	1
FDR 105.4.4B	Chapman Loop B	1
FDR 105.5.4B	Chapman Spur B	1
FDR 105.6.4B	Chapman Loop C	1
FDR 105.7.4B	Chapman Cutoff #1	1
FDR 105.8.4B	Chapman Cutoff #2	1
FDR 105.9.4B	Chapman East Entrance	1
FDR 1870W.2	Spur	51
Way 1906W.1T	Toner Creek	51
Way 1909W.1V	Taylor	51
Way 1910W.1	Deadman	51
Way 1913W.1A	Bowers Gulch Trail	51
Way 1913W.1B	Lone Tree Trail	36
Way 1913W.1C		51
Way 1913W.1D		51
Way 1913W.1E		51
Way 1913W.1F		51
Way 1914W.1	Reudi Creek	64
Way 1915W.1	Strawberry	64
Way 1917W.1W	Burnt Mountain Way	64
Way 1917W.2A	Tellurium Lake Spur	64
Way 1918W.1A	Savage Lake Shortcut	51
Way 1920W.1		51
Way 1921W.1	Marten Creek	64
Way 1923W.1A	Chapman - South Fork	64
Way 1924W.1	South Fork Fryingpan	51
Way 1925W.1	Sawyer Cut Off / Campground	51
Way 1926W.1S	Sawyer Shortcut	64
Way 1937W.1	Almost High Park Trail	44
Way 1937W.2	Almost High Park Trail	44
Way 1943W.1	Stoney Ridge	44
Way 1943W.1G	Middle Thompson Cutoff	44
Way 1944W.2A	Blodgett Way	64
Way 1951W.2	Vetter Trail	36
Way 1954W.1	Crystal R.R.	51
Way 1955W.1	Spring Creek To Bear Creek	51
Way 1955W.1H	Hayes Creek Trail	51
Way 1957W.1A	Thomas Lake Way	51
Way 1957W.1D	Dinkle Lake Way	51
Way 1959W.1W	Avalanche Pass	64
FDR 1966W.1	Old Highway	1
Way 1966W.2	Old Highway	51

H-17

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 1966W.3	Bears Gulch	51
Way 1974W.1A	Hasley Basin	64
Way 1974W.1B	Frigid Short	64
Way 1974W.1C		64
Way 2090W.1W	Babbish Gulch Trails	51
Way 2090W.2	Williams Trail	51
Way 2091W.2	Fourmile - East Divide	51
FDT 1910.2A	Forest Hollow	51
FDT 1910.3	Forest Hollow	51
	Cattle Drive Trail #2	*44 (not in Appendix O of DEIS)*

EAGLE RANGER DISTRICT

FDR 400.3	Eagle - Thomasville	1
FDR 412.1	Gypsum Creek	1
FDR 412.1W		1
FDR 413.2	Hardscrabble	1
FDR 413.2A	Upper Ridge	51
FDR 413.2B	Third Gulch	51
FDR 413.2D		51
FDR 413.2X		51
FDR 413.2Y		51
FDR 413.2Z		51
FDR 414.1	Brush - Gypsum	1
FDR 414.1A		51
FDR 414.1C		51
FDR 415.1	East Brush	1
FDR 415.1F	Fulford Campground	1
FDR 416.1	Hot Creek	1
FDR 416.1A	Yeoman Campground	1
FDR 416.1B	Yeoman Campground B	1
FDR 416.1R		1
FDR 417.1	Leeman Gulch	1
FDR 418.1	Nolan Creek	1
FDR 419.1	Old Fulford	1
FDR 420.2		1
FDR 421.1	Bellyache	1
FDR 421.1C		1
FDR 421.1F		1
FDR 422.1	Squaw Creek	1
FDR 423.1	West Lake	1
FDR 425.1	Red Creek	1
FDR 425.1B	Muckery Lake	1
FDR 426.1	New York Mountain	1
FDR 428.1	Brewster	16
FDR 430.1	Powerline - Cottonwood	1
FDR 430.1A	Slaughter Springs	1
FDR 430.1B	Old Mans	13
FDR 430.1C	Quaker Corral	13
FDR 430.1D	Snake Ridge	16
FDR 430.1E	Sundell Ridge	13
FDR 431.1	Powerline - Crooked Creek	1
FDR 431.1L		9
FDR 431.1M		9
FDR 432.1	Joe Chambers	9
FDR 433.1	Powerline - Gypsum	13

H-18

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 435.1	Porphyry	1,51
	Close below Lettuce Patch Spring	*(details not in Appendix O of DEIS)*
1-6/Trail #3004A and 2091.WTM		*36 (not in Appendix O of DEIS)*
FDR 435.1A	Granite Springs	1
FDR 435.1B		51
FDR 435.1C	Methany Park	1,51
	Close at west end of Methany Park	*(details not in Appendix O of DEIS)*
FDR 436.1	West Hat Creek	1
FDR 441.1	Beecher	1
FDR 441.1A	Beecher No. 1	51
FDR 451.1	Sawmill Spur	1
FDR 451.1A	Stain Fawn	1
FDR 451.1B	Sawmill	1
FDR 452.1	Big Buck	51
FDR 453.1	East Frost Creek	51
FDR 453.1A	Middle Frost Creek	51
FDR 455.1	Ragged Creek	1
FDR 456.1	Too Much	1
FDR 457.1	Antones Creek	51
FDR 460.1	McKenzie Gulch	1
FDR 461.1	Fire Box	1
FDR 464.2	Drill Hole	1
FDR 467.2	Frost Hermit	1
FDR 468.1		1
FDR 514.1	Red Table	1
FDR 514.2		*1 (not in Appendix O of DEIS)*
514 – T1870		*36 (not in Appendix O of DEIS)*
FDR 529.1	Fitzpatrick	1
FDR 529.2	Fitzpatrick	1
FDR 529.2A	Spring Gulch	1
FDR 600.1	Coffee Pot	1
FDR 600.1J		51
FDR 600.1L		51
FDR 600.2	Coffee Pot	1
FDR 600.3	Coffee Pot	1
FDR 600.3A	Deep Creek Overlook	1
FDR 600.3C	Coffee Pot Springs Campground	1
FDR 600.3E	Deep Lake Campground	1
FDR 600.3F	Deep Lake Picnic Ground	1
FDR 600.3G	Deep Lake Campground Spur	1
FDR 600.3H		1
FDR 600.3J		51
FDR 600.3K		1
FDR 600.3L		1
FDR 600.4	Coffee Pot	1
FDR 600.4A		51
FDR 600.4S		1
FDR 600.4T		1
FDR 601.1	Blair Mountain	1
FDR 601.1B	Klines Folly Campground	1
FDR 601.1C	Supply Basin Campground	1
FDR 603.1	Willow Peak	1
FDR 604.1	French Creek	1
FDR 604.1A	Richards Special Use	1
FDR 607.1	Sweetwater Campground	1

H-19

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 607.1A	Rivers	1
FDR 609.1	Derby FSS	1
FDR 609.2	Derby FSS	1
FDR 610.1	North Derby	1
FDR 610.2	North Derby	1
FDR 610.3	North Derby	1
FDR 610.3A		51
FDR 611.1	Red Dirt Basin	1
FDR 611.1A		51
FDR 611.2	Red Dirt Basin	1
FDR 611.2A	Deer Creek	1
FDR 611.2B	Red Dirt Rim	1
FDR 611.2C		1
FDR 611.2D		51
FDR 611.3	Red Dirt Basin	1
FDR 612.1	Middle Derby	1
FDR 613.1	South Derby	1
FDR 613.1A	Ditch Camp	1
FDR 613.1B	Canard Creek	1
FDR 613.1C		51
FDR 613.2	South Derby	1
FDR 614.1	White Owl	1
FDR 614.1A	White Owl Campground	1
FDR 614.1B	White Owl Cabin	1
FDR 615.1	North Cedar Creek	1
FDR 615.2	North Cedar Creek	1
FDR 616.1	Big Spring	1
FDR 617.1	Sweetwater Cow Camp	1
FDR 617.2	Sweetwater Cow Camp	1
FDR 617.2H	Hope Road	1
FDR 618.1	Spring	1
FDR 618.1A		1
FDR 618.1B	Tub Springs	51
FDR 618.1C	Premonition	1
FDR 618.1D	Shorts	1
FDR 618.1E	Lower Short	51
FDR 618.1F	Ten Mile	51
FDR 618.1G	Easy Pickens	51
FDR 619.1	Irrawaddy	1
FDR 620.1	West Deep Creek Rim	1
FDR 621.1	Roncos	1
FDR 621.1A	Coyote Park	1
FDR 622.1	Deadhorse	1
FDR 623.1	Wagon Gulch	1
FDR 623.1A	Lower Lake	1
FDR 624.1	Blue Gulch	1
FDR 624.1A	Grizzly Lookout	1
FDR 626.1	Broken Rib Spring	51
FDR 627.1	Lee Special Use	1
FDR 627.1A		1
FDR 628.1	North Crane Park	1
FDR 628.1A	North Crane Park Spur	1
FDR 629.1	Crane Park	1
FDR 629.1A		1
FDR 630.1	Heart Lake	1
FDR 630.1A	North Heart Lake	1

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 631.1		1
FDR 632.2	Grizzly Jeep	1
FDR 633.1	Johnson Pasture	1
FDR 634.1	Sombrero	1
FDR 635.1		1
FDR 635.1M		1
FDR 640.1	Bison Lake	1
FDR 641.1	Picket Pin	1
FDR 641.1A		51
FDR 641.1B		51
FDR 641.1C	Cross Creek	51
FDR 641.1D		51
FDR 641.1E		51
FDR 641.1F		1
FDR 641.1G	Cross Pin	1
FDR 642.1	Triangle Mountain	1
FDR 643.1	Buck Creek	1
FDR 643.1A	Buck Creek Spur	51
FDR 643.2		51
FDR 644.1	Dry Buck Loop	1
FDR 644.1A	Clock Lake	1
FDR 645.1	Wagon Wheel	1
FDR 645.1A	Hubns Peak	51
FDR 646.1	Craig Peak	1
FDT 1816.2	Trappers Lake	64
FDT 1817.2	W Mountain	64
FDT 1817.3	W Mountain	64
FDT 1830.1A		51
FDT 1832.1	Turret Creek	64
FDT 1836.1	Bear Park	64
FDT 1837.1	Canard Creek	51
FDT 1838.1	Fawn Creek	64
FDT 1839.1	Nellies	64
FDT 1842.1	Island Lakes	64
FDT 1842.1A	Island Lake Spur	64
FDT 1846.1	Solitary Lake	64
FDT 1849.1	Broken Rib	51
FDT 1850.1	Hanging Lake	68
FDT 1851.1	Deadhorse	51
FDT 1852.1	Johnson Pasture	51
FDT 1853.1	Tie Gulch	51
FDT 1854.1	Sweetwater	51
FDT 1855.1	Cross Creek	40
FDT 1856.1	Rim Lake	64
FDT 1857.1	South Derby	64
FDT 1858.1	Middle Derby	64
FDT 1859.1	Bailey Lake	64
FDT 1860.1	Hooper Lake	64
FDT 1860.1A	Keener Lake	64
FDT 1861.1	Sunnyside Lakes	51
FDT 1861.2	Sunnyside Lakes	51
FDT 1862.1	White Creek	51
FDT 1863.1	Sundell	51
FDT 1863.1A	Sourdough Lake	51
FDT 1863.2B	Muckey Lake	51
FDT 1864.1	Yates Gulch	36

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 1865.1	Miller Gulch	51
FDT 1867.1	Prospect	51
FDT 1867.2	Prospect	40
FDT 1869.1	McKenzie Gulch	51
FDT 1869.1H	McKenzie Fork	51
FDT 1870.1	Mount Thomas	44
FDT 1871.1	Antones	51
FDT 1871.1C	Antones Lakes	51
FDT 1872.1	Sneve Gulch	51
FDT 1873.1	Ironedge	51
FDT 1873.2	Ironedge	51
FDT 1873.3	Ironedge	64
FDT 1874.1	Cherry Ponds	51
FDT 1875.1	Fulford Cave	51
FDT 1876.1	New York Mountain	64
FDT 1876.2	New York Mountain	64
FDT 1877.1	Indian Cliffs	51
FDT 1877.1N	Indian Cliff Spur	51
FDT 1878.1	Salt Creek	28
FDT 1879.1	Edge Lake	64
FDT 1880.1	East Lake Creek	64
FDT 1892.1	Sawmill	36
FDT 1895.1	Card Creek	64
FDT 1896.1	Gold Dust	64
FDT 1897.1	Elbow Park	64
FDT 1898.1	Nolan Lake	64
FDT 1899.1	Lake Charles	64
FDT 2029.1	Harolds Trail	51
FDT 2031.1	Ute - Deep	40
FDT 2031.1A	Sweetwater Nature	51
FDT 2032.1	Ute - Sweetwater	51
FDT 2032.2	Ute - Sweetwater	51
FDT 2033.1	Coburn Rim	51
FDT 2034.1	Ute - Sunnyside	51
FDT 2036.1	Burnt Park	51
FDT 2037.1	Sams Pond	51
FDT 2038.1	Derby Ridge	64
FDT 2039.1	z"	64
FDT 2040.1	Ute Bison	51
FDT 2042.1	Shingle Peak	64
FDT 2043.1	Luark	64
FDT 2049.1	Wagon Wheel	64
FDT 2060.1	South W	64
FDT 2062.1	Defiance	51
FDT 2063.1	South Grizzly Loop	51
FDT 2065.1	Grizzly	51
FDT 2067.1	Johnny Meyers	64
FDT 2073.1	Red Dirt	51
FDT 2076.1	Roberts	51
FDT 2076.2	Roberts	64
FDT 2177.1	High Basin	51
FDT 2220.1	Dead Dog	64
FDT 2221.1	New York Lake	64
FDT 2222.1	West Hardscrabble	36
FDT 2223.1	Middle Lake	64
FDT 2224.1	Lost Lake	51

H-22

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 2226.1	Third Gulch	51
FDT 2230.1	West Hat Creek	51
FDT 2269.2	Turret - Crescent	64
Way 413W.2C		51
Way 413W.2E		51
Way 413W.2F		51
Way 413W.2G		51
Way 413W.2H		51
Way 413W.2I		51
Way 413W.2J		51
Way 413W.2K		51
Way 413W.2L		51
Way 413W.2M		51
Way 413W.2N		51
Way 413W.2O		51
Way 413W.2P		51
Way 413W.2Q		51
Way 413W.2S		51
Way 413W.2T		51
Way 413W.2V		51
Way 416W.1H		51
Way 416W.1J		51
Way 416W.1K		51
Way 416W.1U		51
Way 418W.1C		51
Way 418W.1D	McGinley Gulch	51
Way 418W.1F		51
Way 418W.1H		51
Way 418W.1M		51
Way 418W.1N		51
Way 418W.1P		51
Way 418W.1Q		51
Way 418W.1R		51
Way 418W.1S		51
Way 418W.1T		51
Way 418W.1U		51
Way 421W.1L		51
Way 421W.1N		51
Way 426W.1B		51
Way 426W.1D		51
Way 426W.1E		51
Way 426W.1F		51
Way 426W.1G		51
Way 426W.1H		51
Way 441W.1C		51
Way 441W.1D		51
Way 441W.1E		51
Way 441W.1G		51
Way 44*W.1H		51
Way 4*1\W.1J		51
Way 44[W.1K		51
Way 451W.1G		51
Way 451W.1K		51
Way 451W.1L		51
Way 451W.1M		51
Way 451W.1N		51

H-23

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 464W.2E		51
Way 464W.2N	Suicide Mountain Jeep Trail	17
Way 464W.3	Timber Basin Trail	51
Way 600W.3K		51
Way 600W.3P		51
Way 600W.3Q		51
Way 600W.4G		51
Way 601W.1E		51
FDR 601W.1F		51
Way 603W.1S		51
Way 604W.1A		51
Way 614W.1S		51
Way 618W.1E	Jacks Spring	51
Way 618W.1F	Jacks Spring	51
Way 620W.1N		51
Way 620W.1R		51
Way 620W.1T		51
Way 620W.3P		51
Way 632W.2N		51
Way 640W.1B		51
Way 640W.1C		51
Way 640W.1H		51
Way 640W.1K	Bison Lake Spur	51
Way 644W.1W		51
FDT 401049.1	Range Trail	51
FDT 402029.1	Range Trail	51
FDT 404023.1	Range Trail	64
FDT 404028.1	Range Trail	64
FDT 404030.1	Range Trail	51
FDT 404056.1	Range Trail	51
FDT 404066.1	Range Trail	51
FDT 410002.1	Range Trail	51
FDT 413005.1	Range Trail	51
FDT 419005.1	Range Trail	51
FDT 419008.1	Range Trail	51
FDT 419009.1	Range Trail	51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
HOLY CROSS RANGER DISTRICT		
NRT 49.1	Vail Pass - Tennile	51
FDR 145.1	Slide Lake	1
FDR 202.1	Sheep Mtn	1
FDR 202.1A	Sheep Mtn	1
FDR 401.1	Sheephorn	1
FDR 401.1B	Sheephorn Sale Spur	51
FDR 401.1C	Slate Creek	51
FDR 401.1D	Slate Creek	64
FDR 401.1E	Hat Trick	51
FDR 401.1G	Sheephorn	51
FDR 401.A	Lone Lick Lakes	64
FDR 402.1	Cottonwood	1
FDR 404.1	Box Canyon	28
FDR 405.1	Muddy Pass	1
FDR 405.1A	Lava Creek	1
FDR 405.2	Muddy Pass	1
FDR 405.3	Muddy Pass	1
FDR 406.1		1
FDR 409.1	Unit 1	1
FDR 409.1A	Unit 1 Spur	51
FDR 409.2	Unit 1	1
FDR 410.1	Meadow Creek	51
FDR 429.1	Three Licks	1
FDR 433.1	Moniger	1
FDR 434.1	Rock Creek Park	64
FDR 434.1A	Rock Park Spur	64
FDR 437.1	Unit 18	64
FDR 437.1A	Unit 18 Spur	51
FDR 441.1	Three Licks Creek	1
FDR 442.1	Walters Lake	1
FDR 444.1	Cottonwood Basin	1
FDR 445.1	High Trail Gulch	1
FDR 445.1A	High Trail Gulch	1
FDR 445.2	High Trail Gulch	1
FDR 445.3	High Trail Gulch	1
FDR 446.1	McPhee Gulch	1
FDR 446.1A	McPhee Gulch	1
FDR 446.2	McPhee Gulch	1
FDR 447.1	Garden Gulch	1
FDR 447.2	Garden Gulch	1
FDR 449.1	Piney Ridge	1
FDR 449.1A		1
FDR 451.1	Slough Grass Lake	51
FDR 451.1A	Slough Grass Spur	51
FDR 452.1	Slough Grass	51
FDR 452.1A	Lone Lick Creek	51
FDR 700.1	Red Sandstone -Muddy Pass	1
FDR 700.2	Red Sandstone - Muddy Pass	1
FDR 700.2A	Freeman Creek	51
FDR 700.2B	Moniger Park	51
FDR 700.2C	Moniger	51
FDR 700.2D	Pine Creek Spur	51
FDR 700.2E	Freeman Creek No. 2	51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 700.2F	Red Sandstone Spur	51
FDR 700.3	Red Sandstone - Muddy Pass	1
FDR 701.1	Piney	1
FDR 702.1	Resolution	1
FDR 703.1	Homestake	1
FDR 703.1A	Blodgett Campground	1
FDR 703.1B	Lone Rock SHG	1
FDR 703.1C	Homestake SHG	1
FDR 703.1D	Gold Park Campground	1
FDR 703.1G	Gold Park Spur 1G	1
FDR 703.2	Homestake	1
FDR 703.2A	Homestake Spur	1
FDR 703.2B	Homestake Reservoir	1
FDR 704.1	Missouri Creek	1
FDR 704.1A	Missouri Creek	19
FDR 705.1	No Name	1
FDR 705.1M		1
FDR 705.1P	Yoder Gulch	1
FDR 706.1	Peterson Creek	1
FDR 707.1	Tigiwon	13
FDR 707.1A	Tigiwon Campground	13
FDR 707.2A	Tigiwon Sale Spur 2A	64
FDR 707.2B	Tigiwon Sale Spur 2B	64
FDR 707.2C	Tigiwon Sale Spur 2C	64
FDR 707.2D	Tigiwon Sale Spur 2D	64
FDR 707.3A	Tigiwon Spur 3A	64
FDR 707.3B	Tigiwon Spur 3B	64
FDR 707.3C	Tigiwon Spur 3C	64
FDR 708.1	Mc Allister Gulch	1
FDR 708.1A	Resolution Mountain	1
FDR 708.1B	Mcallister Spur	1
FDR 709.1A	Communication Site	16
FDR 709.2	Shrine Pass	16
FDR 710.1	Mill Creek	1
FDR 710.1A	Golden Peak	51
FDR 710.1B	Town Water Tank	51
FDR 710.1C	Lift 6	51
FDR 710.1D	Mill Creek Spur	51
FDR 710.1E	Bottom Lift	51
FDR 710.1F	Mill Creek Spur 1F	51
FDR 710.1G	Mill Creek Spur 1G	51
FDR 710.1H	Mill Creek Spur 1H	51
FDR 711.1	Main Vail	51
FDR 711.3B	Game Creek	51
FDR 711.3C	Game Creek Spur	51
FDR 711.3D	Mid-Vail Water Tank	51
FDR 711.3E	Top Lift 9	51
FDR 711.5B	Vail Mountain Spur	51
FDR 711.5C	Lift 14	51
FDR 711.5D	Back Bowls	51
FDR 711.5E	Sunup Bowl	51
FDR 711.6A	Top Left 10	51
FDR 711.7A	Top Lift 7	51
FDR 712.1	Timber Creek	1
FDR 713.1	Hanks Gulch	1
FDR 713.1A	Shrine Mountain	51

H-26

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 713.1B	Hanks Gulch Spur B	51
FDR 714.1	East Fork Eagle	1
FDR 714.1A	Chalk Lake	51
FDR 714.1B	East Fork Eagle	51
FDR 714.1C	East Fork Spur 1C	1
FDR 714.1E		1
FDR 714.1F	Columbine Ditch	1
FDR 715.1	Pearl Creek	1
FDR 716.1	Camp Hale #1	1
FDR 716.1A	Camp Hale Campground	1
FDR 716.1B	Camp Hale Spur 1B	1
FDR 717.1	June Creek	16
FDR 717.1A	Dead Buck Reservoir	16
FDR 717.1B	June Creek Spur	16
FDR 719.1	Middle Creek	16
FDR 719.1A	East Redsandstone	64
FDR 719.1B	Middle Creek Canyon	64
FDR 719.1C	Middle Creek Spur	64
FDR 719.1D	Middle Creek Spur	64
FDR 719.2A	Middle Creek Spur	64
FDR 719.2B	Middle Creek Spur	64
FDR 719.2C	Middle Creek Spur	64
FDR 719.2D	Middle Creek Spur	64
FDR 719.2E	Eiseman Hut Spur	64
FDR 719.3	Middle Creek Spur	1
FDR 719.3A	Middle Creek Spur	64
FDR 719.3B	Middle Creek	64
FDR 720.1	North Sandstone	64
FDR 720.1A	North Sandstone Spur A	1
FDR 720.1B	North Sandstone Spur	64
FDR 720.1C	North Sandstone Spur	64
FDR 720.1H	North Sandstone Spur H	64
FDR 721.1	Gore Creek Campground	1
FDR 722.1	Black Lakes #1	1
FDR 726.1	Old Highway	1
FDR 726.1A	East Fork Campground Spur	1
FDR 727.1	Fancy-French	16
FDR 728.1	Lime Creek	16
FDR 728.1A	Big Spruce	51
FDR 728.1B	Ridge Road	1
FDR 728.1C	Old Sawmill Road	51
FDR 729.1	Dickson - Red Spring	51
FDR 729.1A	Dickson Spur	51
FDR 730.1	Pine Creek	1
FDR 731.1	Taylor Gulch	1
FDR 731.1A	Taylor Gulch Spur 1a	16
FDR 731.1D	Fiddler Creek	16
FDR 731.1E	Taylor Hill	51
FDR 732.1	Mintum Compound	1
FDR 733.1	Haymeadow	9
FDR 734.1	Red & White Mountain	1
FDR 734.1A	Red & White Mountain	1
FDR 734.1B	Buffehr	28
FDR 734.1C	Freeman Spur	51
FDR 734.1D	Bally Hoo Spur Rd	51
FDR 734.1E	Old FDR 734	1

H-27

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 736.1	Gitalong Road	51
FDR 736.1A	Tourist Trap Spring	51
FDR 737.1	Spraddle Cr	16
FDR 738.1	Beaver Cr	51
FDR 738.1A	Bottom Lift 10	51
FDR 738.1B	Lift 9 Mid-Point	51
FDR 738.1C	Beano	51
FDR 738.2A	McCoy Park	13
FDR 738.2B	McCoy Park Spur	13
FDR 738.3A	Top Lift 7	51
FDR 738.3B	Base Lift 8	51
FDR 738.3C	738 Spur	51
FDR 738.3D	Lift 9 Mid-Point	51
FDR 739.1	Top Lift 8	51
FDR 741.1	Camp Hale Pond	1
FDR 742.1	Holy Cross Boneyard	1
FDR 743.1	Gore Creek	1
FDR 744.1	Piney	19
FDR 744.1	A Piney Spur	19
FDR 745.1	Lime Creek Jeep	19
FDR 746.1	Hornsilver	1
FDR 746.1A	Hornsilver Spur	51
FDR 746.1B	746 Tie Through	51
FDR 747.1	Wearyman	1
FDR 748.1	Line Shack	13
FDR 748.1A	Meadow Mountain Spur	57
FDR 749.1	Meadow Mountain	13
FDR 750.1	Power Line Road	1
FDR 751.1	Ptarmigan	1
FDR 751.1A	Ptarmigan TV	51
FDR 751.1B	Fowler Hilliard Hut	51
FDR 751.1C	Wearyman Spur C	51
FDR 751.2A	Wearyman Spur D	51
FDR 751.2B	Ptarmigan Spur E	51
FDR 751.4A	Wearyman Spur 4a	51
FDR 751.4B	Ptarmigan Spur 4b	51
FDR 752.1	Wearyman Spur 3	64
FDR 752.1A	Wearyman Spur 3a	51
FDR 752.1B	Wearyman Spur 3b	51
FDR 752.1C	Wearyman Spur 3c	51
FDR 753.1	Chimney Rock	1
FDR 754.1	Ski Cooper	51
FDR 755.1	Ranch Creek	1
FDR 757.1	Pearl Creek Jeep	1
FDR 758.1	Dennison	1
FDR 759.1	Holy Cross City	1
FDR 759.1A	Cleveland Lake	51
FDR 762.2	Two Elk Trailhead	1
FDR 763.1	Sawmill Gulch	64
FDR 763.1C	Sawmill Gulch Spur	64
FDR 765.1	Spring Creek	1
FDR 765.1A	Spring Creek No 2	51
FDR 770.1A	Willow Creek	51
FDR 770.1B	Willow Creek	51
FDR 770.1C	Willow Creek	51
FDR 771.1	Turkey Creek	51

H-28

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 774.1A	Berry Creek	16
FDR 774.2	Berry Creek	16
FDR 774.2A	Berry Creek	51
FDR 774.2B	Berry Creek	51
FDR 774.2C		16
FDR 774.2D	Berry Creek	51
FDR 774.2E	Berry Creek	51
FDR 774.2F	Berry Creek	51
FDR 778.1	Beard Creek	1
FDR 778.1A	Beard Creek Spur	1
FDR 778.1B	Lost Reservoir	51
FDR 778.1C	Beard Creek Spur	51
FDR 778.1D	Beard Creek Spur	51
FDR 778.1E	Beard Creek Spur	51
FDR 779.1	Metcalf Creek	1
FDR 780.1	Power Road	1
FDR 780.1A	Power Road	64
FDR 780.1B	Power Road	64
FDR 780.1C	Power Road	64
FDR 780.1D	Power Road	64
FDR 780.1E	Power Road	64
FDR 780.1F	Power Road	64
FDR 780.1G	Power Road	1
FDR 781.1	Cortina Lane	16
FDR 781.1A	781 Spur	1
FDR 782.2	Buck Creek	16
FDR 782.2A	Buck Creek	16
FDR 783.1	Tames Creek	64
FDR 783.1A	Tames No. 1 Reservoir	64
FDR 783.1B	Tames Creek Spur	64
FDR 784.1	Cottonwood Peak	1
FDR 784.1A	Cottonwood Peak	51
FDR 784.1B	Cottonwood Peak	51
FDR 785.1		1
FDR 785.3		1
FDR 786.1	Lost Lake Road	1
FDR 786.1A	Lost Lake Spur	51
FDR 786.1B	Lost Lake Spur	51
FDR 786.1C	Lost Lake Spur	51
FDR 786.1D	Lost Lake Spur	51
FDR 786.1E	Lost Lake Spur	51
FDR 786.1H	Lost Lake Spur	51
FDR 786.2	Lost Lake Spur	1
FDR 786.2A	Lost Lake Spur	51
FDR 786.2B	Lost Lake	51
FDR 786.2C	Lost Lake Spur	51
FDR 786.2D	Lost Lake	51
FDR 786.2E	Lost Lake	51
FDR 786.2F	Lost Lake	51
FDR 786.2G	Lost Lake	51
FDR 786.2H	Lost Lake	51
FDR 787.1	Buffehr	1
FDR 788.1	Moon Park Road	1
FDR 791.1	Lionshead	1
FDR 1834.2	Upper Spring Creek	1
FDT 1850.1	Mount of the Holy Cross Overlook	51

H-29

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 1851.1	Bowmans Shortcut	51
FDT 1880.1	Spraddle Creek	51
FDT 1881.1	Red Canyon Stock Driveway	28
FDT 1881.1A	East Fork	51
FDT 1882.1	Rock Creek Park	51
FDT 1883.1	Meadow - East Meadow Link	64
FDT 1884.1		64
FDT 1884.2		64
FDT 1884.2A	Pine Creek Tie Through	64
FDT 1885.1	Upper Piney	64
FDT 1886.1	East Meadow Creek	64
FDT 1886.1A	1883 - 1886 Connect	64
FDT 1887.1	Bennett Gulch	64
FDT 1888.1	North Fork of Piney Trail	64
FDT 1889.1	Soda Lakes Trail	64
FDT 1890.1	Lower Piney Trail	64
FDT 1891.1	Meadow Creek	64
FDT 1891.1A	FDT 1891 - FDT 1886 Connect	64
FDT 1892.1	Big Park	28
FDT 1893.1	Lost Lake	28
FDT 1894.1	Lost Lake To Piney	51
FDT 1895.1	Elliotts Ridge	64
FDT 1896.1	North Trail	51
FDT 1896.2	North Vail Trail	51
FDT 1896.3	North Vail Trail	51
FDT 1896.5	North Vail Trail	51
FDT 2000.1	Notch Mountain	64
FDT 2001.1	Fall Creek	64
FDT 2002.1	Whitney Lake	64
FDT 2003.1	Missouri Lakes	64
FDT 2003.1A	Upper Missouri Lake Spur	64
NRT 2005.1	Two Elk	13
FDT 2006.1	Cross Creek	64
FDT 2006.1A	Fancy Lake Spur	64
FDT 2006.1B	Mulhall Lakes	64
FDT 2008.1	705 Spur	64
FDT 2009.1	Mount of the Holy Cross	64
FDT 2009.1A	Notch Mountain Overlook	64
FDT 2010.1	Grouse Creek Tie Through	64
FDT 2011.1	Booth Lake	64
FDT 2011.1A	Piney Connector	64
FDT 2012.1	Pitkin 64	64
FDT 2013.1	Bighorn	64
FDT 2014.1	Deluge Lake	64
FDT 2015.1	Gore Creek	64
FDT 2015.1A	Gore Lake	64
FDT 2106.1	Buck Creek	51
FDT 2107.1	Nottingham Ridge	51
FDT 2108.1	Colorado	51
FDT 2109.1	Turquoise Lake	64
FDT 2109.1A	Upper Turquoise Lake	64
FDT 2110.1	Buffehr Mountain	51
FDT 2111.1	Buffehr Creek	51
FDT 2125.1	Cleveland Lake	64
FDT 2126.1	Lonesome Lake	64
FDT 2127.1	Grouse Lake	64

H-30

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 2128.1	Martin Creek	64
FDT 2129.1	West Grouse Creek	64
FDT 2129.1A	Olsen Lake	64
FDT 2129.1B	Meadow Mountain Tie Through	64
FDT 2130.1	Game Creek	64
FDT 2132.1	Sopris Lake	64
Way 2135.1	Middle Creek	64
FDT 2136.01	Son Of Middle	51
FDR 405W.1B		51
FDR 405W.1C		51
FDR 409W.1A		51
FDR 433W.1A	Moniger	51
Way 434W.1B	Rock Creek Park	51
Way 434W.1C	Rock Creek Park	51
Way 434W.1D	Rock Creek Park	51
FDR 700W.2A		51
FDR 700W.2B	Red Sandstone / Muddy Creek	51
Way 705W.1A	No Name	51
Way 705W.1B	No Name	51
Way 705W.1C	No Name	51
Way 705W.1D	No Name	51
Way 711W.4	Minturn To Game Peak	51
Way 718W.1	Mitchell Creek	51
Way 727W.1C		51
Way 727W.1F		64
Way 727W.1H		64
Way 746W.1C		64
Way 751W.1D	Wearyman	64
Way 751W.4C	Ptarmigan	64
Way 752W.1D	Wearyman	51
Way 753W.1	Chimney Rock	51
Way 754W.2	Chicago Ridge	51
FDR 756W.1	Mitchell	1
Way 763W.1A	Sawmill Gulch	51
Way 771W.1A	Turkey Creek	51
Way 988W.1	Lone Licks Way	51
Way 989W.1	Elk Creek Way	51
Way 990W.1A	George Lake	64
Way 990W.1B	Slate Park Temp.	64
Way 990W.1C	Cottonwood Temp	64
way 990W.1D	George Lake Way	64
Way 991W.1	Moniger Way	64
FDR 992W.1	Cache Creek Way	51
Way 992W.1A	Cache Creek Spur	64
FDR 993W.1	Muddy Creek Way	64
FDR 994W.1	Piney Way	51
Way 995W.1	Moniger Way	64
Way 996W.1	Red & White Way	64
Way 998W.1	Jones Gulch Way	64
Way 999W.1	Piney Gulch	64
FDR 1892W.1B		64
Way 1944W.2	Carter Lake Wayrd	64
Way 2004W.1	Upper Homestake	64
Way 2133W.1	Commando Run	13
Way 2134W.1	Ranch Creek	51
Way 2134W.1A	Ranch Creek	51

H-31

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 2347W.1	Paulios Sister	64
Way 2347W.1A	Eastern Hillside	64
Way 2348W.1	Whiskey Creek	13
Way 2348W.1A	Whiskey Creek	13
Way 2349W.1		13
Way 2349W.1A		13
Way 2349W.1B		51
Way 2350W.1		51
FDT 715001.1	Range Trail	51
FDT 728004.1	Range Trail	51
RIFLE RANGER DISTRICT		
Way 11W.1		51
FDR 211.1A	Banner Ridge	51
FDR 211.1B	Irish Spring	51
FDR 211.1K		51
FDR 211.1L		51
FDR 211.1M		1
FDR 211.1N		51
FDR 211.2	Bar H-L	1
FDR 211.2A	Red Elephant	1
FDR 211.2B	Salt Gulch	1
FDR 211.2C		1
FDR 211.2D		1
FDR 211.2E		1
FDR 211.2F		1
FDR 211.2G		1
FDR 211.2H		1
FDR 211.2I		1
FDR 211.2J		1
FDR 211.2K		1
FDR 211.2L		1
FDR 245.2A		1
FDR 245.4	New Castle - Buford	2
FDR 245.4A	Road Camp	1
FDR 245.4B		1
FDR 245.4C		1
FDR 245.4D		1
FDR 245.4E		1
FDR 245.4F		1
FDR 245.4G		1
FDR 245.4H		1
FDR 245.4I		1
FDR 245.4J		1
FDR 245.4K		1
FDR 245.4P		1
FDR 245.4Q		1
FDR 245.4R		1
FDR 264.1	Boundary Road	1
FDR 264.1A	Border Line Road	51
FDR 264.1B		51
FDR 264.2		1
FDR 268.1	Owens Creek	48
FDR 268.2	Owens Creek Road	48
FDR 268.2L		51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 268.2M		51
FDT 270.1C		51
FDR 270.1D		51
FDR 270.1H		51
FDR 270.1I		51
FDR 270.1J		51
FDR 270.1K		51
FDR 270.1L		51
FDR 270.1M		51
FDR 275.1W	Wallace Creek Lodge	51
FDR 300.4N	Dave Fishers Hole	51
FDR 49W.1		1
FDR 601.2	Blair Mountain	1
FDR 601.2A	Middle Creek	1
FDR 601.2B	Beaver Ponds	51
FDR 601.2C	Adams Lake	1
FDR 601.2E	Blair Overlook	1
FDR 601.2F	Cow Lake	1
FDR 601.2G	Swamp	51
FDR 601.2H	Patterson Creek	1
FDR 601.2I		51
FDR 601.2K		51
FDR 601.2L		51
FDR 601.3	Blair Mountain	1
FDR 601.3A	Clough Corral	1
FDR 601.3C		28
FDR 601.3D		28
FDR 601.3E		28
FDR 601.3G		1
FDR 601.3H		1
FDR 601.3I		1
FDR 601.3R		28
FDR 601.4	Blair Mountain	1
FDR 601.4A		1
FDR 601.4B		1
FDR 601.4C		1
FDR 601.4D		1
FDR 601.4E	Cliff Lakes	1
FDR 601.4F		1
FDR 601.4G		1
FDR 601.4H		1
FDR 601.4I		1
FDR 601.4J		1
FDR 601.4K		1
FDR 602.3	Transfer Trail	1
FDR 602.3A		1
FDR 602.3C		51
FDR 602.3D	Johnson Creek	1
FDR 602.3E		1
FDR 602.3F		51
FDR 602.3G		51
FDR 602.3H	Carbonate	51
FDR 602.3I		1
FDR 602.3J		1
FDR 602.3M		51
FDR 602.3N		1

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 602.3P		1
FDR 603.1	Clinetop	1
FDR 603.1A	Buttermilk	1
FDR 603.1B		1
FDR 603.1C		1
FDR 603.1D		1
FDR 603.1E		1
FDR 603.1F		51
FDR 603.1M		1
FDR 603.1N	Joe Hill	1
FDR 603.1P	Cattle Guard Road	1
FDR 603.1R		51
FDR 603.1S		51
FDR 603.1T	Gravel Pit	1
FDR 603.1U		51
FDR 603.2	Clinetop	1
FDR 603.2A	South Ute	51
FDR 603.2B	Five Mile Lake Cutoff	51
FDR 603.2C	Rocky Flats	51
FDR 603.2D		51
FDR 614.2	White Owl	1
FDR 625.1		1
FDR 631.1	Bowen Lake	1
FDR 631.1A	No Name	1
FDR 631.1B	Yellow Lake	1
FDR 631.1G		1
FDR 631.1H		51
FDR 631.1I		51
FDR 632.1	Grizzly Jeep	1
FDR 632.1B		51
FDR 632.1C		51
FDR 632.1D		51
FDR 632.1E		51
FDR 632.1F		51
FDR 632.1G		51
FDR 632.1H		51
FDR 632.1I		51
FDR 632.1J		51
FDR 632.1K		51
FDR 632.1L		51
FDR 632.1M		51
FDR 632.1P	Spring Road	51
FDR 635.2	Storm King	1
FDR 635.2A	Bedspring Park	1
FDR 635.2B		51
FDR 636.1	Boiler Creek	1
FDR 636.1A	Boiler Creek	51
FDR 636.1B	Boiler Creek	51
FDR 636.2		51
FDR 637.1	Keyser Creek	1
FDR 637.1A		1
FDR 637.1B	Blue Lake	1
FDR 637.1C		51
FDR 637.1E		51
FDR 637.1G		51
FDR 637.2		51

H-34

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 637.2F		51
FDR 638.1	Keyser Rim	1
FDR 638.2	Keyser Rim	1
FDR 640.2	Bison Lake	1
FDR 647.1	Bench	1
FDR 647.1A		1
FDR 647.1B		1
FDR 647.1C		1
FDR 647.1D		1
FDR 647.2	Bench	1
FDR 648.1	West Ute Creek	1
FDR 648.1A		51
FDR 648.1B		1
FDR 648.1C		51
FDR 649.1	Corral Point	1
FDR 650.1	Corral Creek	1
FDR 650.1P		2B
FDR 650.1R		2B
FDR 651.1	Burnt Ridge	1
FDR 652.1	Connelly Lake	1
FDR 653.1	Clinetop Cow Camp	51
FDR 653.2	Clinetop Cow Camp	51
FDR 653.2A		1
FDR 653.2B		1
FDR 800.1	West Divide	1
FDR 800.2	West Divide	1
FDR 800.2A	Clark Oil	51
FDR 800.2B		51
FDR 800.2D		51
FDR 800.2H		51
FDR 800.2I		51
FDR 800.2J		51
FDR 800.2K		51
FDR 801.1	Uncle Bob	1
FDR 801.1M		51
FDR 801.1N		51
FDR 801.1P		51
FDR 801.2	East Divide - Uncle Bob	1
FDR 801.2A	Baldy Mtn	51
FDR 801.2B	Well No 20	51
FDR 801.2C	Brook Creek Well	51
FDR 801.2D	Beaver Dam	51
FDR 801.2E	Ginright	51
FDR 801.2F		51
FDR 801.2G		51
FDR 801.2H		51
FDR 801.2I		51
FDR 801.2J		51
FDR 801.2L		51
FDR 801.2Q		51
FDR 801.2R	Well #19	1
FDR 801.2T		51
FDR 801.2U		51
FDR 801.2V	Spring 51	1
FDR 801.2W		51
FDR 801.3	East Divide	1

H-35

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 804.1	Trail Gulch	1
FDR 804.1A	Prairie Mesa	51
FDR 804.1B		51
FDR 804.1C		51
FDR 804.1D		51
FDR 804.1E		51
FDR 804.1F		51
FDR 804.1G		51
FDR 804.1H		51
FDR 804.1L		51
FDR 804.1M		51
FDT 804.2	Trail Gulch	51
FDR 804.3	Trail Gulch	36
FDR 807.1	Clear Creek	1
FDR 807.2	Clear Creek	51
FDR 808.1	Clear Fork	51
FDR 808.1A		51
FDR 809.1	Miners Basin	36
FDR 810.1	Little Beaver Creek	51
FDR 810.1A	East Willow Ridge	51
FDR 812.1	Reservoir Park	1
FDR 812.1A	Division Fence	36
FDR 812.1G		51
Way 812.1H		51
FDR 812.1I		51
FDR 814.1	Cayton FSS	1
FDR 814.1A		51
FDR 814.1B		51
FDR 814.1C		51
FDR 816.1	Alkali Creek	1
FDR 816.1A	Spring Gulch	1
FDR 816.1B		51
FDR 816.1C	Spring Gulch	51
FDR 817.1	Bear Gulch	51
FDR 817.1A	Bear Gulch North	51
FDR 818.1	West Mamm	1
FDR 818.1A	North Hunter Creek	1
FDR 818.1B	Bear Hunter	1
FDR 818.1C		51
FDR 819.1	Homestead	1
FDR 820.1	Ogden Place	1
FDR 821.1	Meadows Cow Camp	1
FDR 821.1B	Deep Creek Ridge	1
FDR 821.1C	Dip	1
FDR 821.1E		51
FDR 821.1F		1
FDR 821.1G		1
FDR 821.1H		1
FDR 821.1I		1
FDR 821.1J		1
FDR 821.1K		1
FDR 821.1L		1
FDR 821.1M		51
FDR 821.1N		51
FDR 822.1	Clark Ridge	1
FDR 822.1A	Clark Ridge Spur	51

H-36

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 822.1B		51
FDR 822.1C		51
FDR 822.1D		51
FDR 822.1E		51
FDR 822.1F		51
FDR 822.1G		51
FDR 823.1	Meadow Lake	1
FDR 823.2	Meadow Lake	1
FDR 823.2A		1
FDR 823.2B		1
FDR 823.2C		1
FDR 823.2E		1
FDR 823.2F		1
FDR 823.2G		51
FDR 823.2H		51
FDR 824.1	Beaver Creek	1
FDR 824.1A		51
FDR 824.1D		51
FDR 825.1	Little Box	1
FDR 825.1A	Three Forks Campground	1
FDR 825.1D	Mud Springs Ranch	1
FDR 828.1	Butler Creek	51
FDR 828.1A		1
FDR 828.1B		1
FDR 828.1C		1
FDR 830.1	Mansfield	1
FDR 830.1A		1
FDR 830.1B		1
FDR 832.1	Coulter Mesa	1
FDR 832.2B	Coulter Lake	1
FDR 832.2C	George Creek	1
FDR 832.2D	Dry Lake	1
FDR 832.2E	Hole-In-Wall	1
FDR 832.2F		1
Way 832.2G		1
FDR 832.2H		1
FDR 832.2I		51
FDR 832.2J		51
FDR 832.2K		1
FDR 832.2L		1
FDR 832.2M		1
FDR 832.2N		1
FDR 832.2P		1
Way 832.2Q		51
FDR 832.2R		1
FDR 832.2S		1
FDR 832.2T		1
FDR 832.2U		1
FDR 832.2V		1
FDR 832.2W		1
FDR 833.1	Wagon Road	1
FDR 833.1L		1
FDR 833.1M		51
FDR 833.1N		51
FDR 833.1P		51
FDR 833.1Q		51

H-37

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 833.1R		1
FDR 833.1S		1
FDR 833.1T		1
FDR 834.1	GV Spring	1
FDR 835.1	Complex	1
FDR 835.1A		1
FDR 835.1B		1
FDR 836.1	Buckskin Lake	1
FDR 836.1A		1
FDR 836.1B		1
FDR 837.1	Middle Rifle	1
FDR 837.1A		1
FDR 837.1B		1
FDR 837.1C		1
FDR 837.1D		1
FDR 838.1	Howey Reservoir	51
FDR 839.1	Big Mountain	1
FDR 841.1	Texas Hill	1
FDR 842.1	Little Muddy	51
FDR 842.1A		51
FDR 843.1	Mosquito Creek	1
FDR 843.1A	Mosquito Lake	1
FDR 847.1	Battlement Jeep	1
FDR 848.1	Red Elephant Cutoff	1
FDR 848.1A		51
FDR 848.1B		51
FDR 848.1E		51
FDR 848.1H		51
FDR 860.1	Lake Park	1
FDR 860.1A		1
FDR 123W.1		51
FDT 1271.1	Mud Hill Spur	51
FDT 1840.1	Hadley Gulch	51
FDT 1840.1A	Zig Zag	51
FDT 1841.1	East Elk Creek	51
FDT 1843.1	Boiler Creek	51
FDT 1844.1	Keyser Creek Trail	51
FDT 1845.1	Mitchell Creek	51
FDT 1847.1	Jessie Weaver	51
FDT 1848.1		51
FDT 1849.2	Broken Rib	51
FDT 1901.1	Jones Creek	48
FDT 1902.1	Cache Creek	64
FDT 1903.1	McCurry Reservoir	51
FDT 2025.1	Palmer Lake	51
FDT 2028.1	Ute - Elk	51
FDT 2048.1	Blair Lake	64
FDT 2059.1	Hadley Point	51
FDT 2065.2	Grizzly	51
FDT 2068.1	Spring Creek	51
FDT 2068.1A	Spring Creek A	51
FDT 2091.1	Fourmile - East Divide	36
FDT 2150.1	Three Forks	51
FDT 2150.1A		51
FDT 2152.1	West Elk Stock Driveway	51
FDT 2152.1F		51

H-38

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 2156.1	Cherry Creek	51
FDT 2157.1	Main Elk	51
FDT 2158.1	Last Chance	51
FDT 2158.1A		51
FDT 2158.1B		51
FDT 2158.1C		51
FDT 2158.1D		51
FDT 2158.1E		51
FDT 2158.1F		51
FDT 2159.1	Ute - Meadow	51
FDT 2160.1	Battlement	51
FDT 2160.1B		51
FDT 2160.1C		51
FDT 2160.1D		51
FDT 2160.2	Battlement	51
FDT 2160.2D	Battlement Trail	51
FDT 2160.2E		28
FDT 2160.2H	Battlement Trail	51
FDT 2160.5	Battlement Trail	51
FDT 2160.6	Battlement	64
FDT 2160.6A	Battlement	51
FDT 2161.1	Ute Lake	51
FDT 2162.1	Cayton Gulch	36
FDT 2163.1	Reno Gulch	51
FDR 2166.1		69
FDT 2166.1A		51
FDT 2166.1B		51
FDT 2167.1	Middle Mamm Creek	51
FDT 2172.1	Lake Fork	51
FDT 2172.1A	Muddy Creek	36
FDT 2177.1	Gas Line - Uncle Bob	51
FDT 2256.1	Cherry Creek	51
FDT 2256.1A		51
FDT 2256.1D		51
FDT 2256.1E		51
FDT 2256.1F		51
FDT 2264.1	Red Elephant Point	28
FDT 2290.1	Fayville	28
FDT 2290.2	Fayville	28
FDT 2291.1	Mansfield Ditch	51
FDR 2293.1		1
Way 601W.2M		51
Way 602W.3K		51
Way 602W.3L		51
Way 602W.3R		51
Way 1809W.1	Miner Basin Trail	51
Way 1812W.1H	Lost Haystack Gate	36
Way 1901W.1P	Jones Creek Trail	51
Way 2091W.1M		51
Way 2172W.1M	East Fork Trail	51
FDT 81005.1	Range Trail	51
FDT 805043.1	Range Trail	51
FDT 806065.1	Range Trail	51
FDT 806088.1	Range Trail	51
FDT 806090.1	Range Trail / Hoffey Trail	36
FDT 806094.1	Range Trail	51

H-39

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 809024.1	Range Trail	51
FDT 809025.1	Range Trail	51
FDT 809025.1A	Range Trail	51
FDT 809026.1	Range Trail	51
FDT 809027.1	Range Trail	51
FDT 809028.1	Range Trail	51
FDT 810011.1	Range Trail	51
FDT 814010.1	Range Trail	51
FDT 814010.1A	Range Trail	51
FDT 815300.1A	Range Trail	51
FDT 815300.1B	Range Trail	51
FDT 815300.1C	Range Trail	51
FDT 815300.1D	Range Trails	51
FDT 815300.1E	Range Trail	51
FDT 815301.1A	Range Trail	51
FDT 815301.1B	Range Trail	51
FDT 815301.1C	Range Trail	51
FDT 915301.1E	Range Trail	51
FDT 815302.1A	Range Trail	51
FDT 815302.1B	Range Trail	51
FDT 815303.1	Range Trail	51
FDT 815305.1	Range Trail	51
FDT 815308.1	Range Trail	51
FDT 815309.1	Range Trail	51
FDT 815312.1	Range Trail	51
FDT 815313.1	Range Trails	51
FDT 815315.1	Range Trails	51
DILLON RANGER DISTRICT		
FDR 2.4	French Gulch	51
FDR 3.1A	North Barton	51
FDR 3.1A	Ski Hill Road	1
FDR 3.1B	South Barton	51
FDR 3.1C	South Barton	51
FDR 5.4	Deer Creek	1
FDR 6.2	Tiger	1
FDR 6.3	Tiger	1
FDR 6.3A	Tiger A	1
FDR 6.3B	Tiger B	1
FDR 10.2	Boreas Pass	1
FDR 23.1	Z	1
FDR 23.2	Spring Creek	1
FDR 23.2A	Alligator A	1
FDR 23.2B	Alligator B	69
FDR 23.2C	Alligator C	69
FDR 23.2D	Alligator 2d	69
FDR 23.2E	Alligator E	69
FDR 23.2F	Alligator F	69
FDR 23.2G	Alligator G	69
FDR 23.2H	North Fork	51
FDR 23.2I	North Fork	69
FDR 2W.2R	SFTS	1
Way 2W.3A	SFTS	51
Way 2W.3A	SFTS	51
FDT 30.1	Ptarmigan Pass	64

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 30.2	Ptarmigan Pass	64
FDT 31.1	Buffalo Cabin	64
FDT 32.1	Mesa Cortina	64
FDT 33.1	Meadow Creek	64
FDT 36.1	Willow Lakes	64
FDT 36.1A	Salmon Lake	64
FDT 37.1	North Tenmile	64
FDT 38.1	Miners Creek	69
FDT 38.1M	Miners Creek	51
NRT 39.1	Wheeler National Recreation Trail	51
FDR 3W.1B	Ski Hill Road	1
FDR 3W.1C	Ski Hill Road	1
FDR 3W.1D	Ski Hill Road	1
FDR 3W.1E	Ski Hill Road	1
Way 3W.2A	SFTS	51
FDT 40.1	Bakers Tank	51
FDT 41.1	Corral Creek	64
FDT 43.1	Mccoulgh Gulch	64
FDT 44.1	Crystal Lake	51
FDT 45.1	Peaks	51
FDR 45.1	Lake Hill	64
FDR 45.1A	Old Dillon Reservoir	51
FDR 45.1B	Old Dillon Reservoir	64
FDT 46.1	North Rock Creek	64
FDT 47.1	Quandary	51
FDR 48.1	Straight Creek	1
NRT 49.2	Vail Pass - Tenmile	51
Way 4W.1	SFTS	51
Way 4W.2	SFTS	51
FDT 50.1	Lily Pad	64
FDR 51.2	Straight Creek	1
FDT 57.1	Cataract Loop	64
FDT 58.1	Spruce Creek	51
FDT 58.1A	Mayflower Lakes	69
FDT 59.1	Boulder Creek	51
FDT 59.2	Boulder Creek	64
FDT 60.1	Gore Range Trail	64
FDT 60.1B	Wheeler Lake Spur	64
FDT 61.1	Eaglesmere	64
FDT 62.1	Surprise	64
FDT 63.1	Upper Cataract	64
FDT 64.1	Lost Lake	64
Way 64.1A	South Rim Black Creek	64
FDR 65.1	Tenderfoot	28
FDT 65.1	Slate Creek	64
FDR 66.2	Frey Gulch	1
FDR 66.2A	Frey Gulch A	51
FDR 66.2B	Frey Gulch B	5
FDR 66.2C	Frey Gulch C	5
FDR 66.2D	Frey Gulch D	5
FDR 66.2E	Frey Gulch E	5
FDT 66.2F	Frey Gulch F	51
FDR 66.3	Frey Gulch	1
FDT 67.1	Stafford Gulch	51
FDT 68.1	Brush Creek	64
FDT 69.1	Ptarmigan	51

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDT 71.1	Acorn Creek	64
FDT 75.1	Wilder Gulch	51
FDT 76.1	Tenderfoot	51
FDT 77.1	Argentine	51
FDT 78.1	Chihuahua Lake	51
FDT 79.1	Gold Hill	51
FDT 80.1	Burro	51
FDR 80.1	Lehman Gulch	1
FDT 80.1A	Breckenridge	51
FDT 87.1	Old Dillon Reservoir	51
FDT 88.1	Windy Point Loop	51
FDT 89.1	Saphire Point Loop	51
FDR 93.1	Lowry Campground	1
FDR 93.1A	Lowry Campground	1
FDR 93.1C		51
FDR 93.1D	Lowry Campground	51
FDR 94.1	North Swan	64
FDR 94.1A		64
FDR 95.1	Windy Point Campground	1
FDR 98.1	Cemetary Hill	1
FDR 10W.2B	Boreas Pass	1
FDR 10W.2C	Bakers Tank	1
Way 10W.2D	Black Powder Pass	51
FDR 150.1	Soda Mine	51
FDR 150.1A	Soda Mine	64
Way 16W.1A	Shrine Pass	51
FDR 175.1	Keystone Gulch	9
FDR 175.2	Keystone Gulch	9
FDR 175.2A	Keystone Gulch	9
FDR 175.4A	Keystone Timber Sale	9
FDR 175.4B	Section 12 Sale	9
FDR 176.1	West Ridge	9
FDR 176.1A	West Ridge A	69
FDR 176.1B	West Ridge B	69
FDR 176.1C	West Ridge C	69
FDR 176.1D	West Ridge D	69
FDR 176.1E	West Ridge E	69
FDR 176.1F	West Ridge F	69
FDR 205.1A	Boulder Creek Campground	1
FDR 228.1	Dillon Administrative Site	1
FDR 250.1	Keystone Ski Area	51
FDR 250.1A	Keystone Ski Area	51
FDR 250.1B	Keystone Ski Area	51
FDR 250.1C	Keystone Ski Area	51
FDR 250.1D	Keystone Ski Area	51
FDR 250.1E	Keystone Ski Area	51
FDR 250.1G	Keystone Ski Area	51
FDR 255.1	Grawelline Gulch	51
FDR 257.1	Arapahoe Basin Ski Area	51
FDR 257.1A	Arapahoe Basin Ski Area	51
FDR 257.1B	Arapahoe Basin Ski Area	51
FDR 258.1	North Fork	1
FDR 259.1	Pass Lake	1
FDR 260.2	Peru Creek	1
FDR 260.2A	Peruvian Mine	51
FDR 260.2B	Horseshoe Basin	51

H-42

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 260.2C	Arapahoe Basin Ski Area	51
FDR 261.1	Peru Creek High	28
FDR 262.1	Revenue Mountain	1
FDR 262.1A	Revenue Mountain	1
FDR 262.1B	Revenue Mountain	28
FDR 263.1	Chihuahua Gulch	1
FDR 264.1	Santa Fe Peak	1
FDR 265.2	Warden Gulch	1
FDR 275.1A	Bear Mountain	1
FDR 275.1B	Glacier Mountain	1
FDR 275.1C	Glacier Mountain	1
FDR 276.1	Hunkydory Mine	1
FDR 276.1A	Spur	1
Way 27W.1	Ruby Ranch	64
Way 27W.1A	Ruby Ranch	64
FDR 286.1	Radical Hill	1
FDR 286.1A	Radical Hill	1
FDR 286.1B	Radical Hill	1
FDR 287.1	Bullion Mine	1
FDR 289.1	Chatauqua	1
Way 28W.1	Willowbrook	51
FDR 290.1	Mohawk	69
Way 29W.1	Eagles Nest Sub	51
Way 29W.1A	Eagles Nest Sub	51
FDR 316.1	Soda Creek	51
FDR 316.1A	Soda Creek	51
FDR 316.1B	Soda Creek	69
Way 31W.1A	Buffalo Mountain	69
Way 33W.1A	Meadow Creek	69
Way 33W.1B	Meadow Creek	69
Way 33W.1C	Meadow Creek	69
FDR 350.1	Galena Gulch	1
FDR 350.2A	Galena - Summit Connect	1
FDR 351.2	Horseshoe Gulch	51
FDR 351.2A	Horseshoe Gulch	64
FDR 351.2B	Horseshoe Gulch	64
FDR 352.1	Summit Gulch	1
FDR 352.1A	Summit Gulch	1
FDR 354.2	North Swan	1
FDR 354.2A	Wise Mountain	51
FDR 354.2B	North Swan	51
FDR 354.2C	North Swan	51
FDR 354.2D	North Swan	51
FDR 354.2E	North Swan	51
FDR 355.2	Georgia Pass	51
FDR 356.1	Garibaldi Gulch	1
FDR 356.3	Garibaldi Gulch	1
FDR 356.5	Garibaldi Gulch	1
FDR 359.1	Muggins Gulch	1
Way 35W.1	Ruby Lake	64
Way 35W.1A	Ruby Lake	64
Way 35W.1B	Ruby Lake	64
Way 35W.1C	Ruby Lake	69
FDR 385.2	Missouri Gulch	1
Way 385.2A	Missouri Gulch	1
FDR 39W.1A	SFTS	69

H-43

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 40W.1A	SFTS	51
Way 42W.1	Officers Gulch	69
FDR 44W.2A	Lower Crystal Lake	64
Way 45W.2	SFTS	51
Way 46W.2A	Bailey Bird Banding	69
Way 47W.1A	Quandary	51
FDR 481.1	Prospect Gulch	1
FDR 481.2	Prospect Gulch	1
FDR 481.3	Prospect Gulch	1
FDR 49W.5A	SFTS	51
FDR 528.2	Illinois Gulch	1
FDR 559.2	Australia Gulch	1
FDR 565.2	Red Cone	1
FDR 567.2	Georgia Gulch	1
FDR 567.3A	Humbug Hill	1
FDR 567.4	Georgia Gulch	1
FDR 568.1	Farncomb Hill	28
FDR 568.2	Farncomb Hill	28
FDR 568.3	Farncomb Hill	28
FDR 568.4	Farncomb Hill	1
FDR 569.1	Little French Gulch	1
FDR 593.2	Indiana Creek	1
FDR 597.1	Dyersville	1
FDR 597.3	Dyersville	1
FDR 600.2	Fredonia Gulch	1
Way 60W.1B	Pebble Creek - Boulder	64
FDR 611.2	Pennsylvania Creek	1
FDR 611.3	Pennsylvania Creek	1
FDT 611.3A		64
FDR 611.W1	SFTS	1
Way 65W.1A	SFTS	51
Way 66W.2A	Frey Gulch	51
Way 66W.2B	Frey Gulch	51
Way 66W.2C	Frey Gulch	51
Way 66W.2G	SFTS	32
FDR 66W.2H	SFTS	32
Way 66W.2R	SFTS	51
Way 66W.2S	SFTS	51
Way 66W.2T	SFTS	51
Way 66W.2U	SFTS	51
Way 66W.4	Frey Gulch	51
FDR 702.1A	Peak 8	51
FDR 702.2	Resolution	1
FDR 714.1A	Chalk Lake	1
FDR 714.2	East Fork Eagle	69
Way 72W.1	Bemrose Ski Circus	64
FDR 749.1	BOEC	51
FDR 750.1	Peak 10	1
FDR 750.1A	Peak 8	1
FDR 750.1B	Peak 8	1
FDR 751.2	Breckenridge Ski Area	1
FDR 751.2A	Chihuahua Gulch	1
FDR 751.2B	Peak 10 Spur	1
FDR 800.3	Spruce Creek	1
FDR 803.1	Crystal Creek	1
Way 80W.1	SFTS	51

H-44

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 80W.1A	SFTS	51
Way 80W.1B	SFTS	51
Way 80W.1C	SFTS	69
FDR 849.1	Silver Lake	51
FDR 850.2	Blue Lakes	1
FDR 850.2A	Blue Lakes	1
FDR 850.3A	Blue Lakes	69
FDR 850.4	Blue Lakes	69
FDR 851.2	McCullough Gulch	1
FDR 851.3	McCullough Gulch	1
FDR 852.1	McCullough Gulch	51
FDR 852.1A	McCullough Gulch	51
FDR 87W.2	SFTS	51
Way 94W.1	SFTS	51
FDR 951.1A	Ophir Mountain	51
FDR 951.1B	Ophir Mountain	51
FDR 951.1C	Ophir Mountain	51
FDR 951.1D	Ophir Mountain	51
FDR 951.1E	Ophir Mountain	51
Way 953.1A	North Barton Gulch	51,69
FDR 953.1B	North Barton Gulch	69
FDR 953.1C	Barton Gulch	69
Way 95W.1A	Prospector Campground	51
FDR 1000.2	Miners Creek	1
FDR 1001.2	Rainbow Lake	51
FDR 1002.1	Masontown	51
FDR 1007.1	Pine Cove Campground	1
FDR 1008.1	Crown Point	51
FDR 1009.1	Peak One	1
FDR 1035.1	Heaton Bay Campground	1
FDR 1178.1	Mayflower Gulch	1,51
FDR 1182.1	Tucker Mountain	69
Way 1182.1A	Climax	69
FDR 1189.1	Copper Mountain	51
FDR 1189.1A	Copper Mountain - McKenzie Gulch	51
FDR 1189.1B	Copper Mountain - Union Gulch	51
Way 120W.3	Soda Creek	51
Way 120W.3A	Soda Creek	51
FDR 120W.3B	Soda Creek	64
Way 120W.4	Soda Creek	64
Way 120W.5	SFTS	51
FDR 1219.1	Ten Mile Canyon	51
FDR 1220.1	Officers Gulch	1
FDR 1221.1	Lake Uneva	69
FDR 1221.1A	Lake Uneva East	69
FDR 1308.1A	Maryland Creek	69
FDR 1308.1B	Maryland Creek	69
FDR 1308.1C	Maryland Creek	69
Way 132W.3	Soda Creek	51
FDR 1351.1A	Pebble Creek	64
FDR 1376.1C	Pebble Creek	1
FDR 1376.1D	Not Rock	51
FDR 1376.1E	Not Rock	51
FDR 1376.1F	Not Rock	51
FDR 1425.1	Columbine Ranch	1
FDR 1452.2	Slate Creek	69

H-45

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 150W.1	SFTS	51
FDR 1690.1	Prairie Point Campground	1
FDR 1692.1	Cow Creek South Campground	1
FDR 1693.1	Cow Creek North Campground	1
FDR 1695.1	Brush Creek	16
FDT 1695.1	Brush Creek	64
FDR 1695.1A	Brush Creek	64
FDR 1695.1B	Brush Creek	64
FDR 1695.1C	Brush Creek	16
FDR 1695.1E	Brush Creek	16
FDR 1699.1	McDonald Flats	1
FDR 1722.1	Lower Cataract	1
FDR 1722.1A	Lower Cataract	1
FDR 1725.1	Cataract Lake	1
FDR 1725.1C	Cataract Campground	1
FDR 1725.2	Cataract Lake	64
FDR 1726.1	Eaglesmere Trailhead	1
Way 175W.1	SFTS	51
Way 175W.2A	Keystone Gulch	51
Way 175W.2B	Keystone Gulch	51
Way 175W.2C	Keystone Gulch	51
Way 175W.2D	Keystone Gulch	51
Way 175W.2E	Keystone Gulch	51
Way 175W.2F	Keystone Gulch	51
Way 175W.2G	Keystone Gulch	51
1235.1	North Ten Mile	51 *(not in Appendix O of DEIS)*
FDR 1761.1	Elliot Creek	69
FDR 1761.1A	Guthrie Gulch	69
FDR 1804.1	Willows Campground	1
FDR 1804.1A	Willows Campground	1
FDR 1806.1	Big Green	1
FDR 1809.1	Elliott Creek Campground	1
FDR 1830.1	Spring Creek Road	1
FDR 1831.1	Mahan Lake	51
FDT 1831.1A	Mahan Lake	51
FDR 1831.1B	Mahan Lake	51
FDR 1831.1C		51
FDR 1831.1D		64
FDR 1831.1E		64
FDR 1831.1F		64
FDR 1831.1G		64
FDR 1831.1I		64
FDR 1832.1	Lower Spring Creek	1
FDR 1832.1A		64
FDR 1832.1B		64
FDR 1832.1C		51
FDR 1832.1D		64
FDR 1832.1E		64
FDR 1832.1F		64
FDR 1832.1G		64
FDR 1832.1J		51
FDR 1832.1K		51
FDR 1832.1L		51
FDR 1832.1M		51
FDR 1832.1N	Spring Creek	51
FDR 1833.1	First Cut Across	1

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 1833.1A		51
FDR 1833.1B		64
FDR 1833.1C		64
FDR 1833.1D		64
FDR 1833.1E		64
FDR 1833.1F		64
FDR 1834.1	Upper Spring Creek	1
FDR 1834.1A	Elliott Ridge	64
FDR 1834.1B	Mather Spring	64
FDR 1834.1C	Elliott Ridge	64
FDR 1835.1	Middle Cut Across	1
FDR 1835.1A		64
FDR 1835.1B		64
FDR 1835.1C		64
FDR 1835.1D		64
FDR 1835.1E		64
FDR 1835.1F		64
FDR 1835.1G		64
FDR 1835.1H		64
FDR 1835.1I		64
FDR 1835.1J		64
FDR 1835.1K		64
FDR 1837.1		51
FDR 1837.1A		51
FDR 1837.1B		51
FDR 1837.1C		51
FDR 1837.1D		64
FDR 1837.1E		64
FDR 1837.1F		64
FDR 1837.1G		64
FDR 1870.1	Pioneer Creek	64
FDR 1870.1B	Pioneer Creek	64
FDR 1877.1 Blue River Campground		1
FDR 1890.1 Hamilton Creek		69
FDR 1908.1 Bushee Creek		69
FDR 1908.2 Bushee Creek		69
FDT 2015.2 Gore Creek		64
FDT 2108.2 Colorado Trail		51
FDT 2257.1 Arapahoe Basin Ski Area		51
FDR 2410.1 Columbine Landing		1
FDR 2450.1A Longs		69
FDR 250W.1F Keystone Ski Area		69
FDR 2515.2 Gravel Pit		69
FDR 2520.2 Pass Creek		69
Way 258W.1A Glacier Peak		51
Way 258W.1B Glacier Peak		51
Way 258W.1C Glacier Peak		51
Way 263W.1A Ruby Gulch		51
FDR 2840.1 Lonesome Gulch		22
FDR 2845.1 Shane Gulch		22
FDR 2848.1	Cottonwood Gulch	22
FDR 2849.1	Cottonwood Gulch	22
FDR 2850.1	Green Mountain Overlook	1
FDR 2855.1	Mumford Gulch	16
FDR 2855.3	Mumford Gulch	16
FDR 2855.3A	Mumford Gulch	64

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 2855.3B	Mumford Gulch	64
FDR 2857.1	Cow Creek	64
FDR 2859.1	Haystack Mountain	69
FDR 2859.2A	Haystack Mountain	10
FDR 2859.3	Haystack Mountain	10
FDR 2859.4	Haystack Mountain	10
Way 285W.1A	Webster Pass	64
Way 290W.1	Mowhawk	69
FDR 2950.2	Williams Peak	16
FDR 2950.2A	Williams Peak	16
FDR 2950.3	Williams Peak	16
FDR 2950.5A	Williams Peak	22
Way 316W.1B Soda Creek		51
Way 316W.1C Soda Creek		51
Way 316W.1D SFTS		51
Way 316W.1E SFTS		51
FDR 350W.1R	SFTS	1
FDR 350W.1S	SFTS	1
FDR 352W.1B	SFTS	1
FDR 352W.1C	SFTS	1
Way 352W.1D	SFTS	28
FDR 355W.1B	SFTS	1
Way 358W.2B	Missouri Gulch	51
Way 385W.2	SFTS	51
FDR 520W.1	Illinois Gulch	1
FDR 520W.2	Illinios Gulch	1
FDR 520W.3	Illinois Gulch	1
FDR 528W.1B	Boreas Pass	1
Way 528W.2B	SFTS	28
FDR 528W.2C	SFTS	1
FDR 528W.3A	SFTS	1
Way 531W.1A	Bakers Tank	28
FDR 538W.1	Illinois Gulch	1
FDR 540W.1	Bakers Tank	1
Way 569W.1A	SFTS	28
Way 569W.1B	SFTS	28
Way 593W.1A	SFTS	28
Way 611W.1A	SFTS	28
Way 611W.2A	SFTS	28
FDR 611W.3A	SFTS	1
Way 611W.3B	SFTS	51
FDR 848W.1	Hoosier Ridge	51
Way 850W.1A	Blue Lakes	69
Way 850W.4A	Blue Lakes	28
Way 853W.1A	Breckenridge	69
Way 952W.1	Tiger Run Resort	64
Way 986W.2	Iron Springs	28
Way 986W.2A	Iron Springs	28
Way 986W.2B	Iron Springs	28
Way 986W.2C	Iron Springs	51
Way 986W.2D	Iron Springs	51
Way 986W.2E	Iron Springs	51
Way 986W.2F	Iron Springs	51
Way 986W.2G	Iron Springs	51
Way 986W.2H	Iron Springs	51
Way 986W.2I	Iron Springs	51

H-48

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
Way 986W.2J	Iron Springs	51
Way 986W.2K	Iron Springs	51
Way 986W.3	SFTS	51
FDR 1000W.2A	Miners Creek	1
FDR 1000W.2B	Miners Creek	51
FDR 1000W.2C	Miners Creek	51
FDR 1000W.2D	Miners Creek	1
FDR 1000W.2E	Miners Creek	1
FDR 1000W.2F	Miners Creek	51
FDR 1000W.2G	Miners Creek	51
FDR 1000W.2H	Miners Creek	51
FDR 1000W.2I	Miners Creek	51
FDR 1000W.2J	Miners Creek	1
FDR 1000W.2K	Miners Creek	1
FDR 1000W.2L	Miners Creek	1
FDR 1000W.2M	Miners Creek	51
FDR 1000W.2N	Miners Creek	51
FDR 1000W.2O	Miners Creek	51
FDR 1000W.2P	Miners Creek	51
FDR 1000W.2Q	Miners Creek	51
Way 1000W.3A	SFTS	51
FDR 1001W.2A	Rainbow Lake	51
FDR 1002W.1A	Rainbow Lake	51
Way 1007W.2	SFTS	51
Way 1007W.3	SFTS	51
Way 1008W.1A	SFTS	51
Way 1008W.1B	SFTS	51
Way 1008W.1C	SFTS	51
Way 1008W.1D	SFTS	51
Way 1008W.1E	SFTS	51
Way 1008W.1K	SFTS	51
Way 1008W.2A	SFTS	51
Way 1008W.2B	SFTS	51
Way 1008W.2C	SFTS	51
Way 1008W.2D	SFTS	51
Way 1008W.2E	SFTS	51
Way 1008W.2F	SFTS	51
Way 1008W.2G	SFTS	51
Way 1008W.2H	SFTS	51
Way 1178W.1	SFTS	51
Way 1181W.1	SFTS	51
FDR 1189W.1C	Copper Ski Area	57
Way 1260W.2	Ryan Gulch	51
Way 1260W.2A	Ryan Gulch	51
Way 1260W.2B	Ryan Gulch	51
Way 1260W.2C	Ryan Gulch	51
Way 1260W.2D	Ryan Gulch	51
Way 1260W.2E	Ryan Gulch	51
Way 1260W.2F	SFTS	51
Way 1260W.2G	SFTS	51
Way 1260W.3	Ryan Gulch	16
Way 1260W.3A	Ryan Gulch	51
Way 1260W.3B	Ryan Gulch	16
Way 1260W.3C	Ryan Gulch	51
Way 1260W.3D Ryan Gulch		51
Way 1260W.3E Ryan Gulch		51

H-49

W11990

SUMMER TRAVEL MANAGEMENT -- ROAD AND TRAIL LIST

Number	Name	Code
FDR 1305W.1	Little Gray House	1
Way 1425W.1A	Harrigan Creek	64
Way 1450W.2A	Hay Camp	64
FDR 1685W.1D	Brush Creek	16
Way 1685W.1F	Brush Creek	69
FDR 1831W.1H		51
Way 2108W.2	Colorado Trail	51
Way 2108W.2A	Jacque Creek	51
Way 2108W.2R	SFTS	64
Way 2108W.3	SFTS	64
Way 2108W.4	SFTS	51
Way 2108W.5	SFTS	51
Way 2108W.6	SFTS	51
FDR 2850W.1	Cottonwood Gulch	1
Way 2850W.1A	Cottonwood Gulch	28
FDR 2950W.2B	Power Line Road	1
FDR 2950W.5A		1
FDR 2950W.6A	Green Mountain	1

Congress of the United States
Washington, DC 20515

W11990

April 20, 2000

Mr. Lyle Laverty
Regional Forester
United States Forest Service
740 Simms Street
Lakewood, Colorado 80401

As Members of the Colorado Delegation to the United States House of Representatives, we are writing to express our support for the blended plan (modified 'C') being drafted by Representative Scott McInnis for management of the White River National Forest. In doing so, we urge you to give full weight, consideration and deference to what we believe is a fair, sound and comprehensive proposal that appropriately balances the Forest's biological well-being with its historic land use values.

As we have stated in previous correspondence, we are deeply concerned that the preferred alternative would unduly alter the historic mission and purpose of the Forest. For many generations, the Forest has been a hub of outdoor activity, attracting recreational and nature enthusiasts from throughout the United States and around the world. In the final analysis, the preferred alternative inadequately balances this fundamental consideration.

We are troubled by the preferred alternative's failure to fully weigh the substantial role that this Forest plays in western Colorado's economy and its quality of life. Moreover, we believe that the final management plan should be substantially overhauled to more fully reflect the Forest's time honored multiple use values.

In addition, we adamantly oppose the inclusion of any federal instream flow provision in the final management plan, as called for in the Draft Environmental Impact Statement. Like Representative McInnis, we believe the federal government should be subject to the Colorado water adjudication process if it seeks to claim or condemn existing water rights.

Ultimately, we believe that Representative McInnis' forest management recommendation, which enjoys wide ranging support among citizens, organizations and locally elected officials in western Colorado, is the appropriate vehicle to balance all of the many competing interests at stake in this process. Accordingly, we lend our endorsement to his compromise efforts and hope that the Forest Service will do the same.

Sincerely,

Joel Hefley
U.S. Congress

Bob Schaffer
U.S. Congress

Tom Tancredo
U.S. Congress

W11990

RUSSELL GEORGE

SPEAKER OF THE HOUSE

COLORADO
HOUSE OF REPRESENTATIVES
STATE CAPITOL
DENVER
80203

April 27, 2000

The Honorable Scott McInnis
320 Cannon House Office Building
Washington, D.C. 20515

Dear Representative McInnis:

As Members of the Colorado State Legislature, we , the undersigned, are writing to express our support for your blended plan (Modified 'C') for management of the White River National Forest. In doing so, we wish to convey our appreciation for your consideration and deference to what we believe is a fair, sound and comprehensive proposal that approximately balances the Forest's biological well-being with its historic land use values.

As we have stated in previous correspondence, we are deeply concerned that the preferred alternative would unduly alter the historic mission and purpose of the Forest. For many generations, the Forest has been a hub of outdoor activity, attracting recreational and nature enthusiasts from throughout the United States and around the world. In the final analysis, the preferred alternative inadequately balances this fundamental consideration.

We are troubled by the preferred alternative's failure to fully weigh the substantial role that this Forest plays in western Colorado's economy and its quality of life. Moreover, we believe that the final management plan should be substantially overhauled to more fully reflect the Forest's time honored multiple use values.

In addition, we adamantly oppose the inclusion of any federal instream flow provision in the final management plan, as called for in the Draft Environmental Impact Statement. We believe that your forest management recommendation, which enjoys wide ranging support among citizens, organizations and locally elected officials in western Colorado, is the appropriate vehicle to balance all of the many competing interests at stake in this process. Though we have not seen the exact language of your Modified "C", we are supportive of the concepts contained in the Draft Summary. Accordingly, we lend our endorsement to your compromise efforts and hope that the Forest Service will do the same.

W11990

W11990

OFFICE OF THE
BOARD OF COMMISSIONERS
(970) 328-8603
FAX (970) 328-7207
TDD (970) 328-8797
Email: bagbcc@eol.net
http://www.eagle-county.com

EAGLE COUNTY, COLORADO

TOM C. STONE
JOHNNETTE PHILLIPS
MICHAEL L. GALLAGHER

May 2, 2000

The Honorable Scott Mcinnis
United States House of Representatives
320 Cannon House Office Building
Washington, D.C. 20515

Dear Representative McInnis:

We believe that the common sense and practical approach for the use of the White River National Forest in Eagle County is to balance the ecological preservation of the Forest and the human uses of the Forest, such as for recreation, tourism, agriculture, water and water rights. However, the US Forest Service describes its "preferred alternative," Alternative D, as "addressing the idea that a higher priority be given to physical and biological resources than to human uses of the Forest."

We strongly support the principle of Multiple Use for the White River National Forest in Eagle County. We believe the better approach is found in, and we endorse, Alternative C, your modified White River National Forest plan.

Sincerely,
EAGLE BOARD OF COUNTY COMMISSIONERS

Tom C. Stone, Chairman

Johnnette Phillips, Commissioner

BOCC/rf

Eagle County Building, 500 Broadway, P.O. Box 850, Eagle, Colorado 81631-0850

W11990

John Martin
Glenwood Springs, CO

Larry McCown
Rifle, CO

Walt Stowe
Glenwood Springs, CO

Garfield County
Board of County Commissioners

March 29, 2000

National Forest Service
White River National Forest HQ
900 Grand Avenue
Glenwood Springs, CO 81601

To Whom it May Concern

The Garfield Board of County Commissioners after a careful evaluation of all available materials concerning the White River National Forest Plan have decided to offer our support for the McInnis / Woodrow Compromise.

As the elected officials for Garfield County it is our responsibility to review all available information before making any decision that is critical to future of Garfield County. We feel that flexibility is the key to forest diversity and health. The McInnis Compromise blends the strongest components of Alternatives B, C, D and I under the banner of one fair-minded and common sense oriented management approach. In addition to blending the strongest components of B, C, D & I the McInnis Compromise eliminates the proposed in stream flow regulations which runs afoul of state water laws. Letting the Colorado Water Conservation Board do their job is the best way to provide for in stream flows not getting the federal government involved.

Thank you for the opportunity to provide comment on the White River National Forest Plan. If you have any questions about our position, please feel free to contact Greg Rodin, Sewer Planner and he will advise the board of your concerns.

Sincerely,

As read for signature 3/29/2000 @10:15AM

John Martin, Chairman
Board of County Commissioners

109 8th Street, Suite 300 • Glenwood Springs, Colorado 81601-3363 • Telephone (970) 945-5004

W11990

GRAND COUNTY BOARD OF COMMISSIONERS

JAMES L. NEWBERRY
District I, Winter Park 80482
ROBERT F. "BOB" ANDERSON
District II, Granby 80446
DUANE E. DAILEY
District III, Hot Sulphur Springs 80451

PHONE: 970/725-3347
Fax: 970/725-3565
LURLENE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

May 2, 2000

Ms. Martha Katelle
White River Forest Supervisor
P.O. Box 948
Glenwood Springs, CO. 81602

Re: White River Forest Plan

Dear Ms. Katelle:

Thank you for the ability to comment on the above referenced plan. Grand County has two comments regarding this plan. First of all, Grand County is a member of Northwest Colorado Council of Governments, and as such, strongly supports the position that Northwest Colorado Council of Governments has expressed with regard to local collaboration being deficient in all alternatives, and its statement regarding the three components that should be included in all alternatives.

Grand County is also a member of Colorado Counties, Inc. Colorado Counties, Inc., through its Public Lands Steering Committee, has expressed support for Modified Alternative "C". This alternative best expresses conservation and development of our natural resources in a balanced manner. Modified Alternative "C" would accomplish the following:

- Provide a wide variety of summer and winter recreations opportunities from primitive to highly developed, which meet current and future visitor needs. These opportunities include a balance between motorized and non-motorized uses.
- Continues current 752 thousand acres of wilderness including significant opportunities to experience primitive conditions and solitude. Recommends minor additions to existing wilderness areas.
- Maintain populations of all wildlife above minimum viability level. Aggressively manages wildlife habitat to improve the biological diversity necessary for the well being of all wildlife species with special emphasis on threatened and endangered species.

P.O. BOX 264 HOT SULPHUR SPRINGS CO 80451-0264

I

W11990

- Continues to provide water for National Forest and downstream users. Protects water quality.
- Continues existing range allotments. Retains enough vacant allotments to provide flexibility to respond for forage shortages during drought years and to provide for the expansion for existing livestock operations.
- Provides for timber harvest.
- Provides for collaborative management with local government areas of mixed private and federal land.

In summary, Modified Alternative "C" provides for a multi-use concept of our public lands while retaining wilderness designations.

Again, thank you for the ability to comment.

Sincerely,

Robert F. Anderson,
Chairman

cc: Congressman Scott McInnis
Northwest Colorado Council of Governments
CCI

W11990

Mesa County, Colorado
BOARD OF COUNTY COMMISSIONERS
District 1 - James (Jim) R. Baughman (970) 244-1605
District 2 - Kathryn H. Hall (970) 244-1604
District 3 - Doralyn B. Genova (970) 244-1606

P.O. Box 20,000 • 750 Main Street • Grand Junction, Colorado 81502-5010 • FAX (970) 244-1639

April 18, 2000

Martha Ketelle, Forest Supervisor
White River National Forest
P. O. Box 948
Glenwood Springs, CO 81625

Dear Ms. Ketelle:

The Mesa County Board of County Commissioners supports U.S. Representative Scott McInnis and his staff in creating a consensus alternative to the proposed White River National Forest Plan alternatives.

We feel Representative McInnis has worked diligently and has suggestions for an alternative that will represent general interests. His proposed alternative demonstrates the principals and philosophy we would like to see in the United States Forest Service final plan document.

If you should have any questions or concerns, please feel free to call us. Thank you.

Sincerely,

Doralyn B. Genova, Chair
Board of Commissioners

Kathryn H. Hall
Commissioner

James R. Baughman
Commissioner

cc: Representative Scott McInnis
Daily Sentinel
Bob Jasper, Mesa County Administrator
Heidi Ott
Pat Kelly

W11990

RESOLUTION NO. 2000-14

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF RIO BLANCO COUNTY REGARDING THE PROPOSED FOREST MANAGEMENT PLANS FOR THE WHITE RIVER NATIONAL FOREST.

WHEREAS, Rio Blanco County has substantial lands located within the White River National Forest; and,

WHEREAS, said Forest lands serve as an important part of the economic base of Rio Blanco County; and,

WHEREAS, Representative Scott McInnis has been working to provide an alternative to the management plans proposed by the United States Forest Service; and,

WHEREAS, the plan by Representative McInnis, in concept, comes closer to providing for multiple use of the forest and meeting the needs of the public than the proposals submitted by the Forest Service; and,

WHEREAS, multiple use is a concept which has been historically followed with regard to the use of our National Forests.

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Rio Blanco County, that the Board supports, in concept, the plan being prepared by Representative Scott McInnis for the management of the White River National Forest.

PASSED, ADOPTED AND APPROVED this 2nd day of May, 2000.

BOARD OF COUNTY COMMISSIONERS
RIO BLANCO COUNTY

By: Kim A. Cook
KIM A. COOK
Chairman

ATTEST:

Nancy P. Amick
NANCY P. AMICK
Clerk and Recorder
Rio Blanco County

Donald L. Davis
DONALD L. DAVIS
Commissioner

Jon P. Collins
JON P. COLLINS
Commissioner

W11990

BOARD OF COUNTY COMMISSIONERS

970-453-2561
fax 970-453-3535

Post Office Box 68
208 East Lincoln Avenue
Breckenridge, Colorado 80424

April 17, 2000

Martha Ketelle
Forest Supervisor
White River National Forest
PO Box 948
Glenwood Springs, CO 81625

Dear Martha,

The Summit County Board of County Commissioners wish to express support for Representative Scott McInnis and his staff in the creation of a consensus alternative to the proposed White River National Forest Plan alternatives. Representative McInnis has worked hard and will present suggestions for an alternative that will represent general interests. The proposed alternative exhibits principals and philosophy we hope to see in the United States Forest Service final plan document.

Thank you,

Gary Lindstrom
Chairman

Bill Wallace
Commissioner

Tom Long
Commissioner

Cc:
Scott McInnis
Summit County Journal
Summit Daily News
Ten Mile Times
Summit Free Press

W11990

February 17, 2000

The Honorable Scott McInnis
United States House of Representatives
213 Cannon House Office Building
1st St. & Independence Ave., SE
Washington, DC 20515

THE CITY OF ASPEN
Office of The Mayor

Dear Scott:

I am sending you a copy of the City of Aspen's and Pitkin County's comments on the White River National Forest proposed management plan.

We would like you to consider supporting our position for our area. Our community, including the City of Aspen, Pitkin County and the Aspen Skiing Company, are in agreement on these comments, so we hope your recommendations can include our position for the parts of the White River National Forest that affect us.

Thank you for considering these comments.

Sincerely,

Rachel Richards, Mayor
City of Aspen

C:\[illegible],

130 South Galena Street · Aspen, Colorado 81611-1975 · Phone 970.920.5090 · Fax 970.920.5119
Printed on Recycled Paper

W11990

AVON
COLORADO

TO: United States Forest Service

FROM: Avon Town Council

DATE: April 25, 2000

RE: White River Forest Management Plan Comments

Upon Review of the selected alternatives that were provided in the draft Forest Service Management Plan, the Avon Town council cannot support any individual alternative. We do not support Alternative D for several reasons, but primarily because it negates Colorado Water Law.

The Avon Town Council does support a balanced plan similar to the comments of Eagle County and Representative Scott McInnis. Without having the opportunity to fully evaluate their comments, we can only support those from the balanced approach. Environmental concerns and public access must be addressed together as this process continues.

We believe that inadequate funding of the White River Forest is partially to blame for the existing conditions. We strongly support additional Federal Funding and local volunteer efforts to assist in maintaining our White River Forest.

Post Office Box 975
400 Benchmark Road
Avon, Colorado 81620

970-748-4000
970-949-6176 Fax
970-845-7708 TTY

W11990

TOWN OF GYPSUM
50 Lundgren Boulevard
P.O. Box 130
Gypsum, CO 81637
970-524-7514 or 970-524-7515
Fax 970-524-7522

Tuesday, May 02, 2000

Honorable Congressman Scott McInnis
320 Cannon
House Office Building
Washington, D.C. 20515

RE: ENDORSEMENT OF WHITE RIVER NATIONAL FOREST PLAN

Dear Congressman McInnis:

The Town of Gypsum is pleased to announce that at our regular meeting on April 25, 2000, the Town Council voted to unanimously endorse your plan for the White River National Forest. The Town recognizes that your plan, while it may not make any one specific party 100% happy, it does represent the most viable compromise for all interested parties. Thank you and your staff for your continued efforts to resolve this controversial issue. If you have any questions, please do not hesitate to contact us.

Very Truly Yours,

TOWN OF GYPSUM

Jeff Shroll

Jeff Shroll, Town Manager

Cc: Steve Carver, Mayor
Tom Stone, Eagle County Commissioner

W11990

CITY OF RIFLE, COLORADO
RESOLUTION NO. 12
SERIES OF 2000

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIFLE, COLORADO, SHOWING SUPPORT FOR THE DRAFT MODIFIED C ALTERNATIVE PLAN FOR THE WHITERIVER NATIONAL FOREST.

WHEREAS, the City of Rifle is located south and west of the Whiteriver National Forest; and

WHEREAS, the Whiteriver National Forest has been, and for generations to come will continue to be, a place for Rifle residents to recreate; and

WHEREAS, the Whiteriver National Forest is a place where people from across the United States come to hunt, fish, and recreate, bringing tourism to the City of Rifle; and

WHEREAS, any long term change in the use of the Forest is of great interest and has significant impact upon the economic viability of the City; and

WHEREAS, Representative McInnis has undertaken an exhaustive study of various use alternatives and has listened to many voices of the people on the Western Slope of Colorado; and

WHEREAS, Representative McInnis has fashioned a balanced plan which is aimed to continue the health of the forest and the use by wildlife, but will also permit both active use, including limited harvesting of timber and forage for livestock, while preserving wilderness options.

NOW THEREFORE, BE IT RESOLVED THAT the City Council of the City of Rifle, Colorado does hereby endorse the draft modified "C" alternative plan as summarized in the attached two page outline and urges the United States Forest Service to give this plan their greatest attention.

THIS RESOLUTION was read, passed and adopted by the Rifle City Council at a regular meeting held this 19th day of April, 2000.

CITY OF RIFLE, COLORADO

By: Mayor

ATTEST:

City Clerk

W11990

"Voice of the Western Slope, since 1953"
A coalition of counties, communities, businesses & individuals

970 / 242-3264 ★ FAX 970 / 245-8300
P.O. Box 550
Grand Junction, Colorado 81502-0550
www.club20.org

White River Forest Management Plan

WHEREAS: CLUB 20's current position in regards to the White River Forest Management Plan is urging the White River National Forest, The Regional Forester, and the Chief of the Forest Service to cause the Proposed Revised Forest Plan and Draft Environmental Impact Statement to be withdrawn, and

WHEREAS: A citizens effort lead by Congressman Scott Mclanis is actively working on a "Modified Alternative" proposal addressing many of the concerns expressed by CLUB 20's Public Lands and Natural Resources Committee and it's Board of Directors, and

WHEREAS: Community and cultural variety and differences exist across the forest, and

WHEREAS: The local decision making process should be respected.

NOW, THEREFORE BE IT RESOLVED by the CLUB 20 Board of Directors at its Annual Meeting on March 3, 2000, that CLUB 20 supports the "Modified Alternative" working group's efforts as a viable solution for the White River Forest Management Plan, requesting they include the input of all local jurisdictions and report their preliminary findings back to the jurisdictions.

W11990

Northwest Colorado Council of Governments

April 27, 2000

The Honorable Scott McInnis
United States House of Representatives
320 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman McInnis:

The Executive Committee of Northwest Colorado Council of Governments (NWCCOG) expresses their appreciation for your interest and involvement in the proposed revision to the White River National Forest Land and Resource Management Plan. The extension of time to the public comment period that you obtained was of benefit to all of our member jurisdictions. We especially appreciate the consultation of Mike Hasse, Bill Enderlin, and Richard Woodrow with our executive director, Gary Severson.

As you are aware, the focus of our review of the Forest Service documents was collaboration and cooperation with local governmental jurisdictions and the locations and prescriptions for intermix lands. Following an extensive review, we believe that collaboration with local governments is a deficiency in all alternatives. Therefore, NWCCOG did not establish a preference of one alternative over another. However, NWCCOG unequivocally believes and recommends that whatever revision of the management plan be approved for the White River National Forest, three components must be included:

1. The effects of urbanization (growth) on multi-jurisdictional planning and management must be assessed in collaboration with appropriate local general-purpose governmental jurisdictions and local, state, and federal land and resource management agencies.

2. A multi-jurisdictional collaborative process must be established for the identification, planning, management, and monitoring of intermixed and or adjacent lands of other jurisdictions that are of concern to those jurisdictions.

3. A collaborative process must be established to identify goals and objectives for multi-jurisdictional management actions that will strive to sustain community vitality and healthy ecosystems on a regional basis.

We appreciate your demonstrated interest in the concerns of Northwest Colorado Council of Governments with the White River National Forest proposed plan revision and we support language in your proposed comment letter that calls for increased

W11990

collaboration with local governmental jurisdictions. We firmly believe that if the Forest Service adopts the suggestions in the NWCCOG response to the White River National Forest pertaining to local governmental collaboration and intermixed lands, bridges of communication and cooperation can be built that will improve community based forest planning and management within the region.

If we can be of any assistance, please call upon us. If you have any questions, please contact Gary Severson, NWCCOG's Executive Director at (970) 468-0295.

Thanks again for your efforts regarding this important matter.

Sincerely,

Peg Toft
Chair, Northwest Colorado Council of Governments

cc: NWCCOG Board Members
Bob Brooks, Colorado Department of Local Affairs

W11990

CCI
Colorado Counties, Inc.
1100 Broadway • Suite 1530 • Denver, Colorado 80290-1501
Phone: 303.861.4076 • Fax: 303.861.2814
e-mail: cci@cocounties.org

April 20, 2000

The Honorable Scott McInnis
United States House of Representatives
320 Cannon House Office Building
Washington, DC 20515

Dear Congressman McInnis:

On behalf of the Public Lands Steering Committee of Colorado Counties, Inc., I am writing today to express our support for your Modified "C" Alternative to the White River National Forest Plan. Though we have not seen the exact language of your Modified "C" Alternative, we are supportive of the concepts contained in the Draft Summary for two primary reasons.

First, our policy supports multiple use on public lands. The efficient administration, conservation and development of our natural resources must be balanced with the protection of the environment and consideration of local needs.

Second, CCI believes that management of federal lands is best developed based on recommendations from the local communities most affected by these decisions. We believe it is important to have a process in place that incorporates the concerns of local elected officials in making recommendations to Congress on federal lands in and around these local communities.

If we can be of any assistance, please call upon us. If you have any questions, please contact Chris Castilian, CCI's Legislative Director, at 303.861.4076.

We appreciate your endeavors.

Yours very truly,

Dennis Brinkar, Jackson County Commissioner
Chair, CCI Public Lands Steering Committee

cc: Don Davis, Rio Blanco County, Vice-Chair, CCI Public Lands Steering Committee
Speaker Russell George
Northwest Colorado Council of Governments

President Johnnette Phillips, Eagle • President-elect Larry Mitsch, Prowers • Jason Sullivan, Douglas • Marianne Rafkogenis, Idaho Springs • Treasurer Barbara Kirkmeyer, Weld • Secretary Ed Jones, El Paso • Past President Mark Arndt, Morgan

W11990

Associated Governments of Northwest Colorado

May 2, 2000

Department of Agriculture
Chief Michael P. Dombeck
Forest Service
4th fl, NW, YATES
Washington DC 20250

RE: Support for Modified C White River Forest Plan

Dear Mr. Dombeck:

This Association representing 5 Counties and 18 Cities in Northwest Colorado supports the Modified C draft planning alternative assembled by Representative Scott McInnis for the new White River forest Plan.

This planning alternative has been unanimously endorsed by our Board of Directors It represents a balanced approach to resolving the National Resource Issues encompassed by the plan. It protects the Natural Resources while at the same time retaining the basic multiple use guidelines which we believe is essential for an acceptable plan. The so-called "preferred alternative D" swings too far away from the multiple use approach. Alternative D does not provide sufficient recognition that mankind is part of the ecosystem for the use of the forest. Further the Modified C alternative provides important protection for Colorado water rights.

We urge the US Forest Service to adopt the Modified C alternative as proposed by Representative McInnis and his forest planning team. Representative McInnis has done an outstanding job gathering the viewpoints or our counties and communities.

Sincerely,

David Lind
Chairman

cc: White River Forest Service,Glenwood: Martha Kettle

POST OFFICE BOX 351 RIFLE, COLORADO 81650 TELEPHONE 970-625-1723 FAX 970-625-6261

W11990

COLORADO RIVER WATER CONSERVATION DISTRICT

P.O. Box 1120
GLENWOOD SPRINGS, COLORADO 81602
970945-8522

FOR IMMEDIATE RELEASE

FOR ADDITIONAL INFORMATION CONTACT: Chris Treese 970 945-8522

April 19, 2000. Glenwood Springs. The Colorado River District Board today endorsed the water resources and water rights language in Congressman McInnis' proposed comment letter to the White River National Forest management plan. McInnis' water language requires the Forest Service to abide by the same rules as all other water users in the state. The Congressman's plan directs the Forest Service to work with and through the Colorado Water Conservation Board, the state agency responsible for acquiring and protecting instream water flows, to protect stream flows within the forest. In contrast, the Forest Service's proposed management plan authorizes Forest Service employees to compel permit holders to forfeit historical water rights when special use permits are up for renewal or original issuance.

The Board awarded $177,335 to 21 entities within the River District in the third year of the District's grant program. This program provides up to 50% matching funds for water quality improvement programs, water conservation, and water efficiency projects. The Board reserved $15,000 for emergency assistance requests which cannot be anticipated during the regular grant application cycle.

The Board approved a Subordination Agreement for the Aspinall Unit's water rights. This agreement represents the formalization of verbal assurances provided by the federal government to residents of the Upper Gunnison River basin in the 1950s when the Aspinall Project (Blue Mesa, Morrow Point, and Crystal Reservoirs) was being permitted. The agreement allows up to 60,000 acre feet of water development to occur without the threat that the upstream junior water rights will be shut off by the senior Aspinall facilities.

– 30 –

W11990

The Eagle Valley Enterprise September 3[illegible]

Extension of forest plan comment period gives the public a fair shake

By Dennis Webb
Western Slope Publishing Group

With the recent decision by the White River National Forest to further extend the comment deadline on its proposed long-range management plan, the agency is providing hope that people's viewpoints truly will be given some weight in deciding how to run the forest.

Previously, skeptics had some reason to wonder.

This summer, the agency released a draft environmental impact statement that outlined several management alternatives, and identified its preferred alternative for how to run the forest.

That approach represents a marked departure from its current approach, which is liberally oriented toward recreation use. Instead, it would downplay such uses in putting a bigger emphasis on the physical and biological resources of the forest, and the protection of biodiversity.

Whether you agree with that direction or not, you have to credit the WRNF for being gutsy enough to take such a stand. Its newly-emerging philosophies aren't entirely its own – springing to a large degree from the thinking of the present Forest Service leadership in Washington, D.C. – but the WRNF nevertheless is the foot soldier charged with executing this revision, knowing it could run into some crossfire.

But given the amount of concern the WRNF's preferred alternative has engendered, it's surprising that its process for finalizing a plan didn't include a longer public comment period.

Agency officials have expressed amazement at just how vocal the public has been about its proposal, but you have to wonder what else they might have expected. To talk about such things as prohibiting ski area expansion beyond that already permitted, and aggressively restricting four-wheel-drive and mountain bike travel, when it has been given a loose rein before, signals some marked shifts away from how the forest has been historically used and enjoyed. The agency should expect nothing less than to hear from constituencies who would be affected by such changes in the status quo, especially when not only their personal enjoyment of the forest but the economic fortunes of area communities could be affected.

Although the plan was issued in draft form purportedly with the purpose of drawing up a final version after taking public input into account, critics of the draft proposal had reason for questioning how fair it was to ask the public to react to the plan in the 90 days originally set aside for that purpose. It took the WRNF several years to propose this plan, and the results of that effort are reflected in about 14 pounds of literature. The plan includes several bulky documents that run a total of some 1,300 pages and can only be fully understood by studying a sizable complement of detailed maps that accompany them.

The agency acknowledged the size of the task it had handed to the public when it first agreed to extend the deadline by an additional 30 days. The fact that it was having to print extra sets of its documents spoke to the intense interest in its proposal, and certainly helped entice it once for making sure it accommodated the time needs of those hoping to understand that proposal and speak up about it.

But another month wasn't very much more time, and U.S. Rep. Scott McInnis, R-Grand Junction, was right to ask for more, putting some congressional clout behind the conservation in local communities. The half year he was requesting was a little excessive, but it was good to see the Forest Service recently push back the deadline again, this time to Feb. 9. Its move reflected the need to adequately address concerns that its plan was being rushed through. It represented a reasonable compromise behind what McInnis sought and what the agency could provide while still being able to produce a timely enough final decision.

Now that the agency has provided more time, it is up to the public to make the best of it, and the Forest Service to be open-minded to citizen concerns. But those future users, too, need to be open-minded. It would be easy to look at forest management selfishly, from the standpoint of any single user group. But people would be better off to keep in mind the balance

W11990

The Eagle Valley Enterprise

September 30, 1999

Forest Plan

From page 8

that is required in trying to manage these public lands for multiple uses. They also would be wise to at least try to understand, even if they don't fully support, the philosophies guiding the WRNF's preferred management alternative.

Talk of biodiversity might not resonate with the business owner who profits from the region's ski industry, or those who love doing their best imitation of a snowcrystal for a pickup truck on a four-wheel-drive forest road. But the health of the forest's plant and animal species should be a priority for our Forest Service, partly for their own sake, and partly because a forest whose biological and physical attributes receive little protection will eventually become one that's also less attractive to the recreationists who either were drawn to live here in some degree because of those attributes or who visit here and spend money here while skiing, hunting, hiking, etc.

But personal views about this new Forest Service thinking are beside the point. WRNF officials have made clear that while certain specifics of their preferred alternative will change based on input, its basic precepts will remain largely the same. We need to learn how to think of our national forests in a different light, even as our Forest Service must continue striving to mind the needs of the people, and not just the land, that it serves.

The time remaining between now and February offers a crucial opportunity for everyone to do just that.

W11990

A SearchColorado Affiliate
SearchGlenwood.com
The Glenwood Post

SECTIONS
News
More News
Points West
Announcements
Sports
Opinion
Community
Features
Business
Regional News
Services
SearchColorado
Marketplace
Stocks
Yellow Pages
Weather
Classifieds
Search
Featured Sites
Health
Multimedia
Colorado Rockies
Travel Guides
Photo Essay
Cyber Sunday
Sky12.Net
Celebrate 2000
Golf Guide
Entertainment
Home & Garden
Mountain Leisure
Star Wars
Super Bowl '99
TV Listings
Horoscopes
Crosswords
Comics
Geekspeak
Click here to visit Alaska
Prepare for the big trip

News

Web posted Thursday, October 21, 1999

Water wars?

River District: Forest Service plan undermines Colorado water law

By DENNIS WEBB
The Glenwood Post

Federal officials are being accused of trying to make a precedent-setting water grab through a little-noticed element of the proposed White River National Forest plan.

WRNF officials found themselves on the defensive Wednesday after Colorado River Water Conservation District officials said the agency is trying to undermine long-established state water laws to help guarantee instream flows on forest lands.

Instream flows are often sought to protect aquatic life and habitat, recreation and aesthetics, and other public and ecological interests. But critics say that in pursuing those flows, the Forest Service would take away the water rights granted to others under the state water allocation system.

The issue threatens to involve the WRNF in a legal battle that is new to it but not to Colorado, having resulted in a court case involving the Arapaho-Roosevelt National Forest and Front Range water users.

"There is going to be litigation in this ..." river district attorney David Halliford warned WRNF officials who spoke at the river district's quarterly meeting at the Hotel Colorado.

"There's a fundamental conflict here, I think," he said.

Added Eric Kuhn, secretary/general manager for the district, "It will be a fight and I don't think it will achieve the objective you're after."

And T. Wright Dickinson, a district board member, called the agency's effort "illegal" and "highly offensive."

agency's effort "illegal" and "highly offensive."

W11990

WRNF officials acknowledged that the plan may need some work as it applies to water language.

"We probably need to clean the wording up," said Forest Planner Carolyn Upton.

But Greg Kuyumjian, a hydrologist with agency, said the agency is intent on seeking so-called bypass flows, perhaps through the authority of the Federal Land Policy and Management Act of 1976, or FLPMA.

"We're not being disrespectful. We're just looking for mechanisms, maybe under FLPMA, that work for the resource," he said.

Said Upton, "It's not the intent of the Forest Service to acquire anyone's water right."

But river district board member Dan Birch countered, "Bypass flows are viewed probably by most people sitting here at the table as taking part of a water right."

Such action would run contrary to the traditional legal understanding that federal government is subject to state water laws, no different from anyone else.

Kuhn expressed alarm about the Forest Service proposal in a recent letter to Greg Walcher, executive director of the state Department of Natural Resources.

"Although the White River National Forest Plan has received considerable public, political and media attention, including your own, this is an element in the plan which has received little notice and which deserves state-level attention," he wrote.

Kuhn noted that historically, the WRNF "is the one forest in Colorado which has deliberately avoided imposing bypass flow conditions, choosing instead to respect the state's instream flow program (administered by the Colorado Water Conservation Board) and Colorado's water courts as the appropriate venue for instream-flow related dispute resolution. ... This fact, along with the recent public declarations by the National Forest Service that the White River plan reflects new national priorities for forest lands, indicates a need for an aggressive political response from the governor and the CWCB.

"The *NFS* appears to be using the White River Forest plan to establish a precedent, which I believe must be responded to vigorously ..."

Upton did little Wednesday to counter water officials' concerns that, particularly with other area national forests now beginning work on revising their long-term management plans, the bypass flow proposal's implications go far beyond the local level. She pointed to the national directives that are guiding all aspects of the local planning effort.

W11990

"This is larger than the White River Forest," she said.

Chris Treese, a spokesman for the river district, said the Forest Service has been demanding the bypass flows as special use permits come up for renewal on forest property. Potentially, this could affect water users, such as cities, that rely on forests for their water supplies.

Traditionally, however, the WRNF has worked well with other agencies, including the river district, on local water matters, river district officials say. These include Glenwood's continuing access to Grizzly Creek water, the issue of stream flows at Snowmass Creek, Carbondale's tapping of the Nettle Creek water source, and the CWCB's protection of flows at Deadhorse Creek, the water source for the popular Hanging Lake in Glenwood Canyon.

Relations haven't been so positive elsewhere. The Forest Service lost a district court case involving a bypass flow claim by the Arapaho-Roosevelt National Forest. But the judge left the door open for the agency by suggesting that while it didn't have authority to make such claims under the initial legislation creating forest reserves, it might have a case under FLPMA.

"The water users in those cases may have won the battle and lost the war," said Kuhn.

The issue has so concerned the state legislature that it appropriated $2 million to help assist in any legal battles over the question.

River district officials want to know why the Forest Service appears to be sidestepping the process of asking the CWCB to file for instream flows on its behalf.

Kuyumjian wasn't able to answer that question Wednesday, and river district officials raised several issues that he and Upton said they would not be able to respond to until consulting with other agency officials. Another question had to do with what impact, if any, proposed wild, scenic or recreation designations for the Cross and Deep creeks, the White and Crystal rivers, and the Colorado River in Glenwood Canyon might have on water users.

And Tom Long, a river district board member, worried that the Forest Service proposal's failure to provide for any "intermix" land

W11990

management areas where cities and forests abut might make it difficult to build tanks and other necessary water infrastructure for these communities.

In the meantime, just what the consequences of bypass flows might be for users can be something of a confusing point.

"A bypass condition doesn't equate to a water right," the river district's attorney, Hallford, notes.

In fact, because the water wouldn't become the Forest's Service's, obtaining such a flow guarantee wouldn't mean that someone with more junior water rights couldn't take the water out downstream, perhaps diluting the value of the bypass, water officials say.

But at the same time, the holder of the senior water rights would lose the water, they say.

When Kuyumjian questioned the notion that a bypass flow represents a taking, river district board member Steve Mathis shot back, "If I have 10 dollars and you take one of them, is that a taking? ..."

"I don't want to get into this debate," answered Kuyumjian.

"I can see why," said Mathis.

Mathis' hypothetical example apparently stemmed from the WRNF's proposal to "acquire instream flow water rights or establish instream flow protection measures in special use authorizations which protect 10 percent of all perennial streams."

Kuyumjian regretted the agency's reference to that figure, which he admitted is fairly arbitrary.

"Whenever we put a number there it always gets us in trouble," he said. "The 10 percent is floating around, doing more harm than good."

Search:

Year: 1999

Search for: Searc

All Contents ©Copyright Western Slope Publishing Group
Comments or questions? Contact the Editor at glenwoodnews@sopris.net.
Contact the webmaster at lolaffa@sopris.net.

W11990

cors.com

DPO

BACK TO NEWS

Mountain bikers fear forest-use plan

By Steve Lipsher
Denver Post Mountain Bureau

Oct. 11 - Editor's note: The White River National Forest, Colorado's most popular recreation area, is developing a new management plan that could drastically affect the way visitors enjoy the woods. This story is one in a series on the plan's potential effects.

SILVERTHORNE - As far as the U.S. Forest Service is concerned, the Ryan Gulch trail doesn't exist.

But the blood trickling down District Ranger Don Carroll's knee, the result of a minor mountain-biking crash into a tree, is very real.

"I didn't know this was here," Carroll said of the challenging single-track trail winding through the trees below a Silverthorne condominium development.

After inspecting his yellow Battle mountain bike for damage, he rejoined Frank Celico, incoming president of the Summit County Fat Tire Society, for the descent back to the trailhead.

"This," Carroll conceded, "is a great spot to know."

Although popular among mountain bikers, hikers and runners, "unofficial" trails such as Ryan Gulch are slated for obliteration under a proposed management plan for the White River National Forest now under consideration, and folks are fuming.

"If somebody could explain to me why this little piece - between I-70 and more than 1,000 condominium units and the wilderness boundary - needs to be closed, maybe I could understand it," Celico said. "But there's no rationale."

The proposed plan, a blueprint for running the forest for the next 15 years, represents a major change in philosophy for the Forest Service by emphasizing wildlife habitat over recreational use, and it has prompted concerns from numerous user groups in the state's most popular playground.

"I think this has stirred up a great deal of interest on the part of the public," said forest supervisor Martha Ketelle, acknowledging the worries of snowmobilers and ranchers, who could be shut out of some

areas, and ski areas, which would be limited to expansions within current boundaries.

W11990

Few groups have been as vocal as mountain bikers, however, who could lose more than half of the trails in Summit County alone under the proposal.

"We have concerns about the plan, and we have parts of the plan that we like," Laura Rossetter, outgoing president of the Fat Tire Society, said at a recent meeting with Forest Service officials that drew more than 100 people. "We are still in the process of developing our official position, but we do have a list of priority trails that could be closed."

Forest officials contend the closures are the result trying to concentrate a growing number of people into smaller areas to aid wildlife, as well as to settle conflicts between the increasing number of mountain bikers and other users.

"Mountain biking is big, really big," said Steve Coupal, forest transportation manager. "Fifteen years ago, when we did the last forest plan, the word "mountain bike' doesn't appear. Recently, there have been some conflicts arising, some concerns about impact that mountain bikes have had, not only socially ... but in terms of resources."

A growing tangle of informal "social" trails created by hikers and bikers, abandoned logging roads and irrigation-ditch trails converted to "off-system" bike paths has spawned a management nightmare for foresters and contribute to erosion, siltation, and stress on animals such as elk and deer.

"It's not an easy thing to manage when we have a spaghetti system of trails," said Angela Glenn, who heads the trail crews in the Dillon ranger district. "There are maps with trails all over the county that are not on our system, trails that are built by homeowners, by user groups."

To show forest supervisors the impact of the proposal, called Alternative D, Celico and other members of the well-organized mountain-biking group recently have been leading them on rides through glorious open meadows and stands of lodgepole pine, over unknown passes and off major thoroughfares.

Pedaling his bright orange Cannondale along the two-track Soda Creek loop - slated for closure - one crisp autumn evening, Celico said his concerns are that bikers and other forest users will not have access to "their own backyards" under the proposal.

"These trails don't get very much maintenance, if any, but they don't really need it," he said. "There are a few areas where we should make new routes to avoid wetlands and things like that, but for the most part, they're good trails."

W11990

As it is, his group already volunteers thousands of hours annually maintaining trails throughout the county, supplementing the Forest Service's two-person trail crew.

"We've worked hard to build a good relationship with the Forest Service," Celico said at a spot overlooking the Keystone golf course, near a homestead on forest land where the ski resort holds hayride cookouts. "They need to understand that these trails are important to us and all the user groups."

The loop is considered key recreation to residents of nearby Summit Cove, a collection of modest homes and trailers. Similar to the Ryan Gulch trail in Silverthorne, it is one of the few close-by access points for those residents to the forest.

"These are real popular areas for people to come after work, where they don't have to drive anywhere and can just get out for a bit," Celico said.

On the ride with Carroll - an avid mountain biker himself, who holds the position only temporarily until a new district ranger is settled - the two congenially debated the merits and liabilities of Alternative D, reminiscent of John McPhee's "Encounters with the Archdruid."

"The problem is, we never inventoried this kind of stuff nationally," Carroll said. "With old logging roads and stuff, we never bothered because we didn't think it would ever be an issue. And now it is."

Celico conceded that some trails should be closed for specific reasons - perhaps even temporarily, under annual seasonal closures - but doesn't believe mountain bikers should have to sacrifice more than other users of the forest.

Interestingly, mountain bikers, who have always considered themselves environmentalists, now find themselves arguing against some environmental concerns under Alternative D.

"We understand the concerns," Celico said, "and we think we can work with them to find good compromises."

Sandwiching Interstate 70, the 2.3-million-acre White River National Forest stretches from the resort towns of Breckenridge and Vail to the sheep country of Meeker. It is home to 12 ski areas and portions of eight wilderness areas, and it hosts an estimated 8.4 million visitors annually - a number that is rising rapidly.

By following the national emphasis of wildlife habitat over recreation, however, those people must be squeezed into smaller areas.

W11990

"We're not trying to say, 'You can't mountain bike.' We're just trying to balance some uses," said forest ecologist Keith Giezentanner.

The management plan - a 14-pound, 800-page document that contains six alternatives including the proposed one - has attracted so much debate among user groups that forest officials have lengthened the public comment period by three months, to Feb. 9.

"Public comments are a very important part of the process, and we'll consider each one," Ketelle said. "We don't count them, and this is not a poll, but the final plan will definitely reflect some of the public comment. I anticipate there will be a lot of changes between the draft plan and the final one."

But for some mountain bikers such as Jeffrey Bergeron, the fear is losing a certain quality of life.

"I think the frustration we're having," he said, "is we all feel we're getting crowded out of what we've been doing all along, and it's not fair."

Copyright 1999 The Denver Post. All rights reserved. This material may not be published, broadcast, rewritten or redistributed.

Return to Top
Return to News
Return to Post Home

W11990

Congress of the United States
Washington, DC 20515

April 20, 2000

Mr. Lyle Laverty
Regional Forester
United States Forest Service
740 Simms Street
Lakewood, Colorado 80401

As Members of the Colorado Delegation to the United States House of Representatives, we are writing to express our support for the blended plan (modified 'C') being drafted by Representative Scott McInnis for management of the White River National Forest. In doing so, we urge you to give full weight, consideration and deference to what we believe is a fair, sound and comprehensive proposal that appropriately balances the Forest's biological well-being with its historic land use values.

As we have stated in previous correspondence, we are deeply concerned that the preferred alternative would unduly alter the historic mission and purpose of the Forest. For many generations, the Forest has been a hub of outdoor activity, attracting recreational and nature enthusiasts from throughout the United States and around the world. In the final analysis, the preferred alternative inadequately balances this fundamental consideration.

We are troubled by the preferred alternative's failure to fully weigh the substantial role that this Forest plays in western Colorado's economy and its quality of life. Moreover, we believe that the final management plan should be substantially overhauled to more fully reflect the Forest's time honored multiple use values.

In addition, we adamantly oppose the inclusion of any federal instream flow provision in the final management plan, as called for in the Draft Environmental Impact Statement. Like Representative McInnis, we believe the federal government should be subject to the Colorado water adjudication process if it seeks to claim or condemn existing water rights.

Ultimately, we believe that Representative McInnis' forest management recommendation, which enjoys wide ranging support among citizens, organizations and locally elected officials in western Colorado, is the appropriate vehicle to balance all of the many competing interests at stake in this process. Accordingly, we lend our endorsement to his compromise efforts and hope that the Forest Service will do the same.

Sincerely,

Joel Hefley
U.S. Congress

Bob Schaffer
U.S. Congress

Tom Tancredo
U.S. Congress

PRINTED ON RECYCLED PAPER

RUSSELL GEORGE

SPEAKER OF THE HOUSE

W11990

COLORADO
HOUSE OF REPRESENTATIVES
STATE CAPITOL
DENVER
80203

April 27, 2000

The Honorable Scott McInnis
320 Cannon House Office Building
Washington, D.C. 20515

Dear Representative McInnis:

As Members of the Colorado State Legislature, we, the undersigned, are writing to express our support for your blended plan (Modified 'C') for management of the White River National Forest. In doing so, we wish to convey our appreciation for your consideration and deference to what we believe is a fair, sound and comprehensive proposal that approximately balances the Forest's biological well-being with its historic land use values.

As we have stated in previous correspondence, we are deeply concerned that the preferred alternative would unduly alter the historic mission and purpose of the Forest. For many generations, the Forest has been a hub of outdoor activity, attracting recreational and nature enthusiasts from throughout the United States and around the world. In the final analysis, the preferred alternative inadequately balances this fundamental consideration.

We are troubled by the preferred alternative's failure to fully weigh the substantial role that this Forest plays in western Colorado's economy and its quality of life. Moreover, we believe that the final management plan should be substantially overhauled to more fully reflect the Forest's time honored multiple use values.

In addition, we adamantly oppose the inclusion of any federal instream flow provision in the final management plan, as called for in the Draft Environmental Impact Statement. We believe that your forest management recommendation, which enjoys wide ranging support among citizens, organizations and locally elected officials in western Colorado, is the appropriate vehicle to balance all of the many competing interests at stake in this process. Though we have not seen the exact language of your Modified "C", we are supportive of the concepts contained in the Draft Summary. Accordingly, we lend our endorsement to your compromise efforts and hope that the Forest Service will do the same.

W11990

The Hon. Scott McInnis
Page 2

Russell George
Matt Smith
Steve Johnson
Scott Webster
Jack Taylor
Scott McInnis
Mark Paschall
Lawrence
Dave Owen
Elsie Fary
Diane Hoppe
Carl Miller
Dan Grossman
Doug Dean
Debbie Allen
John Ewy
Marilyn Musgrave
Jim Lyons
im Lyce

W11990

OFFICE OF THE
BOARD OF COMMISSIONERS
(970) 328-8685
FAX (970) 328-7207
TDD (970) 328-8797
Email: bagleco@eagle.net
http://www.eagle-county.com

EAGLE COUNTY, COLORADO

TOM C. STONE
JOHNNETTE PHILLIPS
MICHAEL L. GALLAGHER

May 2, 2000

The Honorable Scott McInnis
United States House of Representatives
320 Cannon House Office Building
Washington, D.C. 20515

Dear Representative McInnis:

We believe that the common sense and practical approach for the use of the White River National Forest in Eagle County is to balance the ecological preservation of the Forest and the human uses of the Forest, such as for recreation, tourism, agriculture, water and water rights. However, the US Forest Service describes its "preferred alternative," Alternative D, as "addressing the idea that a higher priority be given to physical and biological resources than to human uses of the Forest."

We strongly support the principle of Multiple Use for the White River National Forest in Eagle County. We believe the better approach is found in, and we endorse, Alternative C, your modified White River National Forest plan.

Sincerely,
EAGLE BOARD OF COUNTY COMMISSIONERS

Tom C. Stone, Chairman

Johnnette Phillips, Commissioner

BOCC/tf

Eagle County Building, 500 Broadway, P.O. Box 850, Eagle, Colorado 81631-0850

W11990

John Martin
Glenwood Springs, CO

Larry McCown
Rifle, CO

Walt Stowe
Glenwood Springs, CO

Garfield County
Board of County Commissioners

March 23, 2000

National Forest Service
White River National Forest HQ
900 Grand Avenue
Glenwood Springs, CO 81601

To Whom It May Concern:

The Garfield Board of County Commissioners after a careful evaluation of all available materials concerning the White River National Forest Plan have decided to offer our support for the McInnis / Woodrow Compromise.

As the elected officials for Garfield County it is our responsibility to review all available information before making any decision that is critical to future of Garfield County. We feel that flexibility is the key to future diversity and health. The McInnis Compromise blends the strongest components of Alternatives B, C, D and I under the banner of one fair-minded and common sense resource management approach. In addition to blending the strongest components of B, C, D & I the McInnis Compromise eliminates the proposal in instream flow regulation which puts allot of state water laws. Letting the Colorado Water Conservation Board do their job is the best way to provide for in stream flows not getting the federal government involved.

Thank you for the opportunity to provide comment on the White River National Forest Plan. If you have any questions about our position, please feel free to contact Greg Hunter, Senior Planner and he will advise the Board of your concerns.

Sincerely,

As sent for signature 3/28/2000 @10:15AM

John Martin, Chairman
Board of County Commissioners

109 8th Street, Suite 300 • Glenwood Springs, Colorado 81601-3363 • Telephone (970) 945-5004

W11990

GRAND COUNTY BOARD OF COMMISSIONERS

JAMES L. NEWBERRY
District I, Winter Park 80482
ROBERT F. "BOB" ANDERSON
District II, Granby 80446
DUANE E. DAILEY
District III, Hot Sulphur Springs 80451

PHONE: 970/725-3347
Fax: 970/725-3565
LUKE LAMB UNDERSHERIFF, CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

May 2, 2000

Ms. Martha Katelle
White River Forest Supervisor
P.O. Box 948
Glenwood Springs, CO. 81602

Re: White River Forest Plan

Dear Ms. Katelle:

Thank you for the ability to comment on the above referenced plan. Grand County has two comments regarding this plan. First of all, Grand County is a member of Northwest Colorado Council of Governments, and as such, strongly supports the position that Northwest Colorado Council of Governments has expressed with regard to local collaboration being deficient in all alternatives, and its statement regarding the three components that should be included in all alternatives.

Grand County is also a member of Colorado Counties, Inc. Colorado Counties, Inc., through its Public Lands Steering Committee, has expressed support for Modified Alternative "C". This alternative best expresses conservation and development of our natural resources in a balanced manner. Modified Alternative "C" would accomplish the following:

- Provide a wide variety of summer and winter recreation opportunities from primitive to highly developed, which meet current and future visitor needs. These opportunities include a balance between motorized and non-motorized uses.
- Continues current 732 thousand acres of wilderness including significant opportunities to experience pristine conditions and solitude. Recommends minor additions to existing wilderness areas.
- Maintain populations of all wildlife above minimum viability level. Aggressively manages wildlife habitat to improve the biological diversity necessary for the well being of all wildlife species with special emphasis on threatened and endangered species.

P.O. BOX 264 HOT SULPHUR SPRINGS CO 80451-0264

W11990

- Continues to provide water for National Forest and downstream users. Protects water quality.
- Continues existing range allotments. Retains enough vacant allotments to provide flexibility to respond for forage shortages during drought years and to provide for the expansion for existing livestock operations.
- Provides for timber harvest.
- Provides for collaborative management with local government areas of mixed private and federal land.

In summary, Modified Alternative "C" provides for a multi-use concept of our public lands while retaining wilderness designations.

Again, thank you for the ability to comment.

Sincerely,

Robert F. Anderson,
Chairman

cc: Congressman Scott Mcinnis
Northwest Colorado Council of Governments
CCI

Mesa County, Colorado
BOARD OF COUNTY COMMISSIONERS
District 1 - James (Jim) R. Baughman (970) 244-1605
District 2 - Kathryn H. Hall (970) 244-1604
District 3 - Doralyn B. Genova (970) 244-1606

P.O. Box 20,000 • 750 Main Street • Grand Junction, Colorado 81502-5010 • FAX (970) 244-1639

W11990

April 18, 2000

Martha Ketelle, Forest Supervisor
White River National Forest
P. O. Box 948
Glenwood Springs, CO 81625

Dear Ms. Ketelle:

The Mesa County Board of County Commissioners supports U.S. Representative Scott McInnis and his staff in creating a consensus alternative to the proposed White River National Forest Plan alternatives.

We feel Representative McInnis has worked diligently and has suggestions for an alternative that will represent general interests. His proposed alternative demonstrates the principals and philosophy we would like to see in the United States Forest Service final plan document.

If you should have any questions or concerns, please feel free to call us. Thank you.

Sincerely,

Doralyn B. Genova, Chair
Board of Commissioners

Kathryn H. Hall
Commissioner

James R. Baughman
Commissioner

cc: Representative Scott McInnis
Daily Sentinel
Bob Jasper, Mesa County Administrator
Pat Kelly

W11990

RESOLUTION NO. 2000-14

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF RIO BLANCO COUNTY REGARDING THE PROPOSED FOREST MANAGEMENT PLANS FOR THE WHITE RIVER NATIONAL FOREST.

WHEREAS, Rio Blanco County has substantial lands located within the White River National Forest; and,

WHEREAS, said Forest lands serve as an important part of the economic base of Rio Blanco County; and,

WHEREAS, Representative Scott McInnis has been working to provide an alternative to the management plans proposed by the United States Forest Service; and,

WHEREAS, the plan by Representative McInnis, in concept, comes closer to providing for multiple use of the forest and meeting the needs of the public than the proposals submitted by the Forest Service; and,

WHEREAS, multiple use is a concept which has been historically followed with regard to the use of our National Forests.

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Rio Blanco County, that the Board supports, in concept, the plan being prepared by Representative Scott McInnis for the management of the White River National Forest.

PASSED, ADOPTED AND APPROVED this 2nd day of May, 2000.

BOARD OF COUNTY COMMISSIONERS
RIO BLANCO COUNTY

By: KIM A. COOK
Chairman

ATTEST:

NANCY R. AMICK
Clerk and Recorder
Rio Blanco County

DONALD L. DAVIS
Commissioner

JOE P. COLLINE
Commissioner



BOARD OF COUNTY COMMISSIONERS *W11990*

970-453-2561
fax 970-453-5535

Post Office Box 68
208 East Lincoln Avenue
Breckenridge, Colorado 80424

April 17, 2000

Martha Ketelle
Forest Supervisor
White River National Forest
PO Box 948
Glenwood Springs, CO 81625

Dear Martha,

The Summit County Board of County Commissioners wish to express support for Representative Scott McInnis and his staff in the creation of a consensus alternative to the proposed White River National Forest Plan alternatives. Representative McInnis has worked hard and will present suggestions for an alternative that will represent general interests. The proposed alternative exhibits principals and philosophy we hope to see in the United States Forest Service final plan document.

Thank you,

Gary Lindstrom
Chairman

Bill Wallace
Commissioner

Tom Long
Commissioner

Cc:
Scott McInnis
Summit County Journal
Summit Daily News
Ten Mile Times
Summit Free Press

W11990

February 17, 2000

The Honorable Scott McInnis
United States House of Representatives
215 Cannon House Office Building
1st St. & Independence Ave., SE
Washington, DC 20515

THE CITY OF ASPEN
Office of The Mayor

Dear Scott:

I am sending you a copy of the City of Aspen's and Pitkin County's comments on the White River National Forest proposed management plan.

We would like you to consider supporting our position for our area. Our community, including the City of Aspen, Pitkin County and the Aspen Skiing Company, are in agreement on these comments, so we hope your recommendations can include our position for the parts of the White River National Forest that affect us.

Thank you for considering these comments.

Sincerely,

Rachel Richards, Mayor
City of Aspen

130 South Galena Street · Aspen, Colorado 81611-1975 · Phone 970-920-5090 · Fax 970-920-5198

W11990

AVON
COLORADO

TO: United States Forest Service

FROM: Avon Town Council

DATE: April 25, 2000

RE: White River Forest Management Plan Comments

Upon Review of the selected alternatives that were provided in the draft Forest Service Management Plan, the Avon Town council cannot support any individual alternative. We do not support Alternative D for several reasons, but primarily because it negates Colorado Water Law.

The Avon Town Council does support a balanced plan similar to the comments of Eagle County and Representative Scott Mckinnis. Without having the opportunity to fully evaluate their comments, we can only support them from the balanced approach. Environmental concerns and public access must be addressed together as this process continues.

We believe that inadequate funding of the White River Forest is partially to blame for the existing conditions. We strongly support additional Federal Funding and local volunteer efforts to assist in maintaining our White River Forest.

Post Office Box 975
400 Benchmark Road
Avon, Colorado 81620

970-748-4000
970-949-9130 Fax
970-845-7306 TTY

W11990

TOWN OF GYPSUM
50 Lundgren Boulevard
P.O. Box 130
Gypsum, CO 81637
970-524-7514 or 970-524-7515
Fax 970-524-7522

Tuesday, May 02, 2000

Honorable Congressman Scott Mckinnis
320 Canon
House Office Building
Washington, D.C. 20515

RE: ENDORSEMENT OF WHITE RIVER NATIONAL FOREST PLAN

Dear Congressman McInnis:

The Town of Gypsum is pleased to announce that at our regular meeting on April 25, 2000, the Town Council voted to unanimously endorse your plan for the White River National Forest. The Town recognizes that your plan, while it may not make any one specific party 100% happy, it does represent the most viable compromise for all interested parties. Thank you and your staff for your continued efforts to resolve this controversial issue. If you have any questions, please do not hesitate to contact us.

Very Truly Yours,

TOWN OF GYPSUM

Jeff Shroll

Jeff Shroll, Town Manager

Cc: Steve Carver, Mayor
Tom Stone, Eagle County Commissioner

W11990

CITY OF RIFLE, COLORADO
RESOLUTION NO. 12
SERIES OF 2000

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIFLE, COLORADO, SHOWING SUPPORT FOR THE DRAFT MODIFIED C ALTERNATIVE PLAN FOR THE WHITERIVER NATIONAL FOREST.

WHEREAS, the City of Rifle is located south and west of the Whiteriver National Forest; and

WHEREAS, the Whiteriver National Forest has been, and for generations to come will continue to be, a place for Rifle residents to recreate; and

WHEREAS, the Whiteriver National Forest is a place where people from across the United States come to hunt, fish, and recreate, bringing tourism to the City of Rifle; and

WHEREAS, any long term change in the use of the Forest is of great interest and has significant impact upon the economic viability of the City; and

WHEREAS, Representative McInnis has undertaken an exhaustive study of various use alternatives and has listened to many voices of the people on the Western Slope of Colorado; and

WHEREAS, Representative McInnis has fashioned a balanced plan which is aimed to continue the health of the forest and the use by wildlife, but will also permit both active use, including limited harvesting of timber and forage for livestock, while preserving wilderness options.

NOW THEREFORE, BE IT RESOLVED THAT the City Council of the City of Rifle, Colorado does hereby endorse the draft modified "C" alternative plan as summarized in the attached two page outline and urges the United States Forest Service to give this plan their greatest attention.

THIS RESOLUTION was read, passed and adopted by the Rifle City Council at a regular meeting held this 19th day of April, 2000.

CITY OF RIFLE, COLORADO

By: Mayor

ATTEST:

City Clerk

W11990

"Voice of the Western Slope, since 1953"
A coalition of counties, communities, businesses & individuals

970 / 242-3264 ★ FAX 970 / 245-8300
P.O. Box 550
Grand Junction, Colorado 81502-0550
www.club20.org

White River Forest Management Plan

WHEREAS: CLUB 20's current position in regards to the White River Forest Management Plan is urging the White River National Forest, The Regional Forester, and the Chief of the Forest Service to cause the Proposed Revised Forest Plan and Draft Environmental Impact Statement to be withdrawn, and

WHEREAS: A citizens effort lead by Congressman Scott McInnis is actively working on a "Modified Alternative" proposal addressing many of the concerns expressed by CLUB 20's Public Lands and Natural Resources Committee and it's Board of Directors, and

WHEREAS: Community and cultural variety and differences exist across the forest, and

WHEREAS: The local decision making process should be respected.

NOW, THEREFORE BE IT RESOLVED by the CLUB 20 Board of Directors at its Annual Meeting on March 3, 2000, that CLUB 20 supports the "Modified Alternative" working group's efforts as a viable solution for the White River Forest Management Plan, requesting they include the input of all local jurisdictions and report their preliminary findings back to the jurisdictions.

1

W11990

Northwest Colorado Council of Governments

P.O. Box 2308 · 249 Warren Ave. · Silverthorne, CO 80498 · 970-468-0295 · Fax: 970-468-1208 · www.nwccog.org

April 27, 2000

The Honorable Scott McInnis
United States House of Representatives
320 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman McInnis:

The Executive Committee of Northwest Colorado Council of Governments (NWCCOG) expresses their appreciation for your interest and involvement in the proposed revision to the White River National Forest Land and Resource Management Plan. The extension of time to the public comment period that you obtained was of benefit to all of our member jurisdictions. We especially appreciate the consultation of Mike Hesse, Bill Endries, and Richard Woodrow with our executive director, Gary Severson.

As you are aware, the focus of our review of the Forest Service documents was collaboration and cooperation with local governmental jurisdictions and the locations and prescriptions for intermix lands. Following an extensive review, we believe that collaboration with local governments is a deficiency in all alternatives. Therefore, NWCCOG did not establish a preference of one alternative over another. However, NWCCOG unequivocally believes and recommends that whatever revision of the management plan be approved for the White River National Forest, three components must be included:

1. The effects of urbanization (growth) on multi-jurisdictional planning and management must be assessed in collaboration with appropriate local general-purpose governmental jurisdictions and local, state, and federal land and resource management agencies.

2. A multi-jurisdictional collaborative process must be established for the identification, planning, management, and monitoring of intermixed and or adjacent lands of other jurisdictions that are of concern to those jurisdictions.

3. A collaborative process must be established to identify goals and objectives for multi-jurisdictional management actions that will strive to sustain community vitality and healthy ecosystems on a regional basis.

We appreciate your demonstrated interest in the concerns of Northwest Colorado Council of Governments with the White River National Forest proposed plan revision and we support language in your proposed comment letter that calls for increased

1

W11990

collaboration with local governmental jurisdictions. We firmly believe that if the Forest Service adopts the suggestions in the NWCCOG response to the White River National Forest pertaining to local governmental collaboration and intermixed lands, bridges of communication and cooperation can be built that will improve community based forest planning and management within the region.

If we can be of any assistance, please call upon us. If you have any questions, please contact Gary Severson, NWCCOG's Executive Director at (970) 468-0295.

Thanks again for your efforts regarding this important matter.

Sincerely,

Peg Toft
Chair, Northwest Colorado Council of Governments

CC: NWCCOG Board Members
Bob Brooks, Colorado Department of Local Affairs

1

W11990

CCI

Colorado Counties, Inc.

1700 Broadway • Suite 1210 • Denver, Colorado 80290-1210
Phone: 303.861.4076 • Fax: 303.861.3013
e-mail: cci@ccionline.org

April 20, 2000

The Honorable Scott McInnis
United States House of Representatives
320 Cannon House Office Building
Washington, DC 20515

Dear Congressman McInnis:

On behalf of the Public Lands Steering Committee of Colorado Counties, Inc., I am writing today to express our support for your Modified "C" Alternative to the White River National Forest Plan. Though we have not seen the exact language of your Modified "C" Alternative, we are supportive of the concepts contained in the Draft Summary for two primary reasons.

First, our policy supports multiple use on public lands. The efficient administration, conservation and development of our natural resources must be balanced with the protection of the environment and consideration of local needs.

Second, CCI believes that management of federal lands is best developed based on recommendations from the local communities most affected by these decisions. We believe it is important to have a process in place that incorporates the concerns of local elected officials in making recommendations to Congress on federal lands in and around these local communities.

If we can be of any assistance, please call upon us. If you have any questions, please contact Chris Castilian, CCI's Legislative Director, at 303.861.4076.

We appreciate your endeavors.

Yours very truly,

Dennis Brinker

Dennis Brinker, Jackson County Commissioner
Chair, CCI Public Lands Steering Committee

cc: Don Davis, Rio Blanco County, Vice-Chair, CCI Public Lands Steering Committee
Speaker Russell George
Northwest Colorado Council of Governments

President Johnnette Phillips, Eagle • President-elect Larry Mason, Prowers • Jaime Sullivan, Douglas • Marianne Rafopoulos, Moffat
Jerry Allen, Cheyenne • Treasurer Barbara Kirkmeyer, Weld • Secretary Ed Jones, El Paso • Past President Mark Arndt, Morgan

1

W11990

Associated Governments of Northwest Colorado

May 2, 2000

Department of Agriculture
Chief Michael P. Dombeck
Forest Service
4th fl, NW, YATES
Washington DC 20250

RE: Support for Modified C White River Forest Plan

Dear Mr. Dombeck:

This Association representing 5 Counties and 18 Cities in Northwest Colorado supports the Modified C draft planning alternative assembled by Representative Scott McInnis for the new White River forest Plan.

This planning alternative has been unanimously endorsed by our Board of Directors. It represents a balanced approach to resolving the National Resource Issues encompassed by the plan. It protects the Natural Resources while at the same time retaining the basic multiple use guidelines which we believe is essential for an acceptable plan. The so-called "preferred alternative D" swings too far away from the multiple use approach. Alternative D does not provide sufficient recognition that mankind is part of the ecosystem for the use of the forest. Further the Modified C alternative provides important protection for Colorado water rights.

We urge the US Forest Service to adopt the Modified C alternative as proposed by Representative McInnis and his forest planning team. Representative McInnis has done an outstanding job gathering the viewpoints or our counties and communities.

Sincerely,

David Lind
Chairman

cc: White River Forest Service, Glenwood: Martha Ketelle

POST OFFICE BOX 351 RIFLE, COLORADO 81650 TELEPHONE 970-625-1723 FAX 970-625-9281

W11990

COLORADO RIVER WATER CONSERVATION DISTRICT

P.O. Box 1120
GLENWOOD SPRINGS, COLORADO 81602
970/945-8522

FOR IMMEDIATE RELEASE

FOR ADDITIONAL INFORMATION CONTACT: Chris Treese 970 945-8522

April 19, 2000. Glenwood Springs. The Colorado River District Board today endorsed the water resources and water rights language in Congressman McInnis' proposed comment letter to the White River National Forest management plan. McInnis' water language requires the Forest Service to abide by the same rules as all other water users in the state. The Congressman's plan directs the Forest Service to work with and through the Colorado Water Conservation Board, the state agency responsible for acquiring and protecting instream water flows, to protect stream flows within the forest. In contrast, the Forest Service's proposed management plan authorizes Forest Service employees to compel permit holders to forfeit historical water rights when special use permits are up for renewal or original issuance.

The Board awarded $177,335 to 21 entities within the River District in the third year of the District's grant program. This program provides up to 50% matching funds for water quality improvement programs, water conservation, and water efficiency projects. The Board reserved $15,000 for emergency assistance requests which cannot be anticipated during the regular grant application cycle.

The Board approved a Subordination Agreement for the Aspinall Unit's water rights. This agreement represents the formalization of verbal assurances provided by the federal government to residents of the Upper Gunnison River basin in the 1950s when the Aspinall Project (Blue Mesa, Morrow Point, and Crystal Reservoirs) was being permitted. The agreement allows up to 60,000 acre feet of water development to occur without the threat that the upstream junior water rights will be shut off by the senior Aspinall facilities.

– 30 –

W11990

The Eagle Valley Enterprise September 30, 1

Extension of forest plan comment period gives the public a fair shake

By Dennis Webb
Western Slope Publishing Group

With the recent decision by the White River National Forest to further extend the comment deadline on its proposed long-range management plan, the agency is providing hope that people's viewpoints truly will be given some weight in deciding how to run the forest.

Previously, skeptics had some reason to wonder.

This summer, the agency released a draft environmental impact statement that outlined several management alternatives, and identified its preferred alternative for how to run the forest.

That approach represents a marked departure from its current approach, which is liberally oriented toward recreation use. Instead, it would downplay such uses in putting a bigger emphasis on the physical and biological resources of the forest, and the protection of biodiversity.

Whether you agree with that direction or not, you have to credit the WRNF for being gutsy enough to take such a stand. Its newly-emerging philosophies aren't entirely its own – springing to a large degree from the thinking of the premier Forest Service leadership in Washington, D.C. – but the WRNF nevertheless is the local publicist charged with executing this mission, knowing it could run into some crossfire.

But given the amount of concern the WRNF's preferred alternative has engendered, it's surprising that its process for finalizing a plan didn't include a longer public comment period.

Agency officials have expressed amazement at just how vocal the public has been about its proposal, but you have to wonder what else they might have expected. To talk about such things as prohibiting ski area expansion beyond that already permitted, and aggressively restricting four-wheel-drive and mountain bike travel when it has been given a loose rein before, signals some marked shifts away from how the forest has been historically used and enjoyed. The agency should expect nothing less than to hear from constituencies who would be affected by such changes in the status quo, especially when not only their personal enjoyment of the forest but the economic fortunes of area communities could be affected.

Although the plan was issued in draft form purportedly with the purpose of drawing up a final version after taking public input into account, critics of the draft proposal had reason for questioning how fair it was to ask the public to react to the plan in the 90 days originally set aside for that purpose. It took the WRNF several years to propose this plan, and the results of that effort are reflected in about 14 pounds of literature. The plan includes several bulky documents that run a total of some 1,200 pages and can only be fully understood by studying a sizable complement of detailed maps that accompany them.

The agency acknowledged the size of the task it had handed to the public when it first agreed to extend the deadline by an additional 30 days. The fact that it was having to print extra sets of its documents spoke to the intense interest in its proposal, and certainly helped make a case for making sure it accommodated the time needs of those hoping to understand that proposal and speak up about it.

But another month wasn't very much more time, and U.S. Rep. Scott McInnis, R-Grand Junction, was right to ask for more, putting some congressional clout behind the conservation district comments. The half year he was requesting was a little excessive, but it was good to see the Forest Service recently push back the deadline again, this time to Feb. 9. Its move reflected the need to adequately address concerns that the plan was being rushed through. It represented a reasonable compromise behind what McInnis sought and what the agency could provide while still being able to produce a timely enough final decision.

Now that the agency has provided more time, it is up to the public to make the best of it, and the Forest Service to be open-minded to citizen concerns. But those forest users, too, need to be open-minded. It would be easy to look at forest management unfairly, from the standpoint of any single user group. But people would be better off to keep in mind the balance

W11990

The Eagle Valley Enterprise

September 30, 1999

Forest Plan

From page 8

that is required in trying to manage these public lands for multiple uses. They also would be wise to at least try to understand, even if they don't fully support, the philosophies guiding the WRNF's preferred management alternative.

Talk of biodiversity might not resonate with the hotrock crowd who profits from the region's ski industry, or those who love doing their best imitation of a commercial for a pickup truck on a four-wheel-drive forest road. But the health of the forest's plant and animal species should be a priority for our Forest Service, partly for their own sake, and partly because a forest whose biological and physical attributes receive little protection will eventually become one that's also less attractive to the recreationists who either were drawn to live here in some degree because of those attributes or who visit here and spend money here while skiing, hunting, hiking, etc.

But personal views about this new Forest Service thinking are beside the point. WRNF officials have made clear that while certain specifics of their preferred alternative will change based on input, its basic precepts will remain largely the same. We need to learn how to think of our national forests in a different light, even as our Forest Service must continue striving to meet the needs of the people, and not just the loud, that it serves.

The time remaining between now and February offers a crucial opportunity for everyone to do just that.

W11990

A SearchColorado Affiliate
SearchGlenwood.com
The Glenwood Post

SECTIONS
News
More News
Points West
Announcements
Sports
Opinion
Community
Features
Business
Regional News
Services
SearchColorado
Marketplace
Stocks
Yellow Pages
Weather
Classifieds
Search
Featured Sites
Health
MyEmedia
Colorado Rockies
Travel Guides
Photo Essay
Cyber Sunday
Big12.Net
Celebrate 2000
Golf Guide
Entertainment
Home & Garden
Mountain Leisure
Star Wars
Super Bowl '99
TV Listings
Horoscopes
Crosswords
Comics
Geekspeak
Click here to visit Alaska
Prepare for the big trip

News

Web posted: Thursday, October 21, 1999

Water wars?

River District: Forest Service plan undermines Colorado water law

By DENNIS WEBB
The Glenwood Post

Federal officials are being accused of trying to make a precedent-setting water grab through a little-noticed element of the proposed White River National Forest plan.

WRNF officials found themselves on the defensive Wednesday after Colorado River Water Conservation District officials said the agency is trying to undermine long-established state water laws to help guarantee instream flows on forest lands.

Instream flows are often sought to protect aquatic life and habitat, recreation and aesthetics, and other public and ecological interests. But critics say that in pursuing those flows, the Forest Service would take away the water rights granted to others under the state water allocation system.

The issue threatens to involve the WRNF in a legal battle that is new to it but not to Colorado, having resulted in a court case involving the Arapaho-Roosevelt National Forest and Front Range water users.

"There is going to be litigation in this ..." river district attorney David Hallford warned WRNF officials who spoke at the river district's quarterly meeting at the Hotel Colorado.

"There's a fundamental conflict here, I think," he said.

Added Eric Kuhn, secretary/general manager for the district, "It will be a fight and I don't think it will achieve the objective you're after."

And T. Wright Dickinson, a district board member, called the agency's effort "illegal" and "highly offensive."

agency's effort "illegal" and "highly offensive."

W11990

WRNF officials acknowledged that the plan may need some work as it applies to water language.

"We probably need to clean the wording up," said Forest Planner Carolyn Upton.

But Greg Kuyumjian, a hydrologist with agency, said the agency is intent on seeking so-called bypass flows, perhaps through the authority of the Federal Land Policy and Management Act of 1976, or FLPMA.

"We're not being disrespectful. We're just looking for mechanisms, maybe under FLPMA, that work for the resource," he said.

Said Upton, "It's not the intent of the Forest Service to acquire anyone's water right."

But river district board member Dan Birch countered, "Bypass flows are viewed probably by most people sitting here at the table as taking part of a water right."

Such action would run contrary to the traditional legal understanding that federal government is subject to state water laws, no different from anyone else.

Kuhn expressed alarm about the Forest Service proposal in a recent letter to Greg Walcher, executive director of the state Department of Natural Resources.

"Although the White River National Forest Plan has received considerable public, political and media attention, including your own, this is an element in the plan which has received little notice and which deserves state-level attention," he wrote.

Kuhn noted that historically, the WRNF "is the one forest in Colorado which has deliberately avoided imposing bypass flow conditions, choosing instead to respect the state's instream flow program (administered by the Colorado Water Conservation Board) and Colorado's water courts as the appropriate venue for instream-flow related dispute resolution. ... This fact, along with the recent public declarations by the National Forest Service that the White River plan reflects new national priorities for forest lands, indicates a need for an aggressive political response from the governor and the CWCB.

"The NFS appears to be using the White River Forest plan to establish a precedent, which I believe must be responded to vigorously ..."

10/21/1999 10:09 AM

Welcome to Search Glenwood - A service of the Glenwood Post Water team! 10/21/99 http://www.searchcolorado.com/glenwood/stories/182199new_182199040.shtml

W11990

Upton did little Wednesday to counter water officials' concerns that, particularly with other area national forests now beginning work on revising their long-term management plans, the bypass flow proposal's implications go far beyond the local level. She pointed to the national directives that are guiding all aspects of the local planning effort.

"This is larger than the White River Forest," she said.

Chris Treese, a spokesman for the river district, said the Forest Service has been demanding the bypass flows as special use permits come up for renewal on forest property. Potentially, this could affect water users, such as cities, that rely on forests for their water supplies.

Traditionally, however, the WRNF has worked well with other agencies, including the river district, on local water matters, river district officials say. These include Glenwood's continuing access to Grizzly Creek water, the issue of stream flows at Snowmass Creek, Carbondale's tapping of the Nettle Creek water source, and the CWCB's protection of flows at Deadhorse Creek, the water source for the popular Hanging Lake in Glenwood Canyon.

Relations haven't been so positive elsewhere. The Forest Service lost a district court case involving a bypass flow claim by the Arapaho-Roosevelt National Forest. But the judge left the door open for the agency by suggesting that while it didn't have authority to make such claims under the initial legislation creating forest reserves, it might have a case under FLPMA.

"The water users in those cases may have won the battle and lost the war," said Kuhn.

The issue has so concerned the state legislature that it appropriated $2 million to help assist in any legal battles over the question.

River district officials want to know why the Forest Service appears to be sidestepping the process of asking the CWCB to file for instream flows on its behalf.

Kuyumjian wasn't able to answer that question Wednesday, and river district officials raised several issues that he and Upton said they would not be able to respond to until consulting with other agency officials. Another question had to do with what impact, if any, proposed wild, scenic or recreation designations for the Cross and Deep creeks, the White and Crystal rivers, and the Colorado River in Glenwood Canyon might have on water users.

And Tom Long, a river district board member, worried that the Forest Service proposal's failure to provide for any "intermix" land

of 3

10/21/1999 10:09 AM

W11990

management areas where cities and forests abut might make it difficult to build tanks and other necessary water infrastructure for these communities.

In the meantime, just what the consequences of bypass flows might be for users can be something of a confusing point.

"A bypass condition doesn't equate to a water right," the river district's attorney, Hallford, notes.

In fact, because the water wouldn't become the Forest's Service's, obtaining such a flow guarantee wouldn't mean that someone with more junior water rights couldn't take the water out downstream, perhaps diluting the value of the bypass, water officials say.

But at the same time, the holder of the senior water rights would lose the water, they say.

When Kuyumjian questioned the notion that a bypass flow represents a taking, river district board member Steve Mathis shot back, "If I have 10 dollars and you take one of them, is that a taking? ..."

"I don't want to get into this debate," answered Kuyumjian.

"I can see why," said Mathis.

Mathis' hypothetical example apparently stemmed from the WRNF's proposal to "acquire instream flow water rights or establish instream flow protection measures in special use authorizations which protect 10 percent of all perennial streams."

Kuyumjian regretted the agency's reference to that figure, which he admitted is fairly arbitrary.

"Whenever we put a number there it always gets us in trouble," he said. "The 10 percent is floating around, doing more harm than good."

Search:

Year: 1999

Search for: Search

All Contents ©Copyright Western Slope Publishing Group
Comments or questions? Contact the Editor at glenwoodnews@sopris.net.
Contact the webmaster at lolalle@sopris.net.

cars.com

W11990

DPO
DENVER POST
ARTICLE SEARCH

BACK TO MENU

Mountain bikers fear forest-use plan

By Steve Lipsher
Denver Post Mountain Bureau

Oct. 11 - Editor's note: The White River National Forest, Colorado's most popular recreation area, is developing a new management plan that could drastically affect the way visitors enjoy the woods. This story is one in a series on the plan's potential effects.

SILVERTHORNE - As far as the U.S. Forest Service is concerned, the Ryan Gulch trail doesn't exist.

But the blood trickling down District Ranger Don Carroll's knee, the result of a minor mountain-biking crash into a tree, is very real.

"I didn't know this was here," Carroll said of the challenging single-track trail winding through the trees below a Silverthorne condominium development.

After inspecting his yellow Battle mountain bike for damage, he rejoined Frank Celico, incoming president of the Summit County Fat Tire Society, for the descent back to the trailhead.

"This," Carroll conceded, "is a great spot to know."

Although popular among mountain bikers, hikers and runners, "unofficial" trails such as Ryan Gulch are slated for obliteration under a proposed management plan for the White River National Forest now under consideration, and folks are fuming.

"If somebody could explain to me why this little piece - between I-70 and more than 1,000 condominium units and the wilderness boundary - needs to be closed, maybe I could understand it," Celico said. "But there's no rationale."

The proposed plan, a blueprint for running the forest for the next 15 years, represents a major change in philosophy for the Forest Service by emphasizing wildlife habitat over recreational use, and it has prompted concerns from numerous user groups in the state's most popular playground.

"I think this has stirred up a great deal of interest on the part of the public," said forest supervisor Martha Ketelle, acknowledging the worries of snowmobilers and ranchers, who could be shut out of some

W11990

areas, and ski areas, which would be limited to expansions within current boundaries.

Few groups have been as vocal as mountain bikers, however, who could lose more than half of the trails in Summit County alone under the proposal.

"We have concerns about the plan, and we have parts of the plan that we like," Laura Rossetter, outgoing president of the Fat Tire Society, said at a recent meeting with Forest Service officials that drew more than 100 people. "We are still in the process of developing our official position, but we do have a list of priority trails that could be closed."

Forest officials contend the closures are the result trying to concentrate a growing number of people into smaller areas to aid wildlife, as well as to settle conflicts between the increasing number of mountain bikers and other users.

"Mountain biking is big, really big," said Steve Coupal, forest transportation manager. "Fifteen years ago, when we did the last forest plan, the word "mountain bike' doesn't appear. Recently, there have been some conflicts arising, some concerns about impact that mountain bikes have had, not only socially ... but in terms of resources."

A growing tangle of informal "social" trails created by hikers and bikers, abandoned logging roads and irrigation-ditch trails converted to "off-system" bike paths has spawned a management nightmare for foresters and contribute to erosion, siltation, and stress on animals such as elk and deer.

"It's not an easy thing to manage when we have a spaghetti system of trails," said Angela Glenn, who heads the trail crews in the Dillon ranger district. "There are maps with trails all over the county that are not on our system, trails that are built by homeowners, by user groups."

To show forest supervisors the impact of the proposal, called Alternative D, Celico and other members of the well-organized mountain-biking group recently have been leading them on rides through glorious open meadows and stands of lodgepole pine, over unknown passes and off major thoroughfares.

Pedaling his bright orange Cannondale along the two-track Soda Creek loop - slated for closure - one crisp autumn evening, Celico said his concerns are that bikers and other forest users will not have access to "their own backyards" under the proposal.

"These trails don't get very much maintenance, if any, but they don't really need it," he said. "There are a few areas where we should make new routes to avoid wetlands and things like that, but for the most part, they're good trails."

W11990

As it is, his group already volunteers thousands of hours annually maintaining trails throughout the county, supplementing the Forest Service's two-person trail crew.

"We've worked hard to build a good relationship with the Forest Service," Celico said at a spot overlooking the Keystone golf course, near a homestead on forest land where the ski resort holds hayride cookouts. "They need to understand that these trails are important to us and all the user groups."

The loop is considered key recreation to residents of nearby Summit Cove, a collection of modest homes and trailers. Similar to the Ryan Gulch trail in Silverthorne, it is one of the few close-by access points for those residents to the forest.

"These are real popular areas for people to come after work, where they don't have to drive anywhere and can just get out for a bit," Celico said.

On the ride with Carroll - an avid mountain biker himself, who holds the position only temporarily until a new district ranger is settled - the two congenially debated the merits and liabilities of Alternative D, reminiscent of John McPhee's "Encounters with the Archdruid."

"The problem is, we never inventoried this kind of stuff nationally," Carroll said. "With old logging roads and stuff, we never bothered because we didn't think it would ever be an issue. And now it is."

Celico conceded that some trails should be closed for specific reasons - perhaps even temporarily, under annual seasonal closures - but doesn't believe mountain bikers should have to sacrifice more than other users of the forest.

Interestingly, mountain bikers, who have always considered themselves environmentalists, now find themselves arguing against some environmental concerns under Alternative D.

"We understand the concerns," Celico said, "and we think we can work with them to find good compromises."

Sandwiching Interstate 70, the 2.3-million-acre White River National Forest stretches from the resort towns of Breckenridge and Vail to the sheep country of Meeker. It is home to 12 ski areas and portions of eight wilderness areas, and it hosts an estimated 8.4 million visitors annually - a number that is rising rapidly.

By following the national emphasis of wildlife habitat over recreation, however, those people must be squeezed into smaller areas.

W11990

"We're not trying to say, 'You can't mountain bike.' We're just trying to balance some uses," said forest ecologist Keith Giezentanner.

The management plan - a 14-pound, 800-page document that contains six alternatives including the proposed one - has attracted so much debate among user groups that forest officials have lengthened the public comment period by three months, to Feb. 9.

"Public comments are a very important part of the process, and we'll consider each one," Ketelle said. "We don't count them, and this is not a poll, but the final plan will definitely reflect some of the public comment. I anticipate there will be a lot of changes between the draft plan and the final one."

But for some mountain bikers such as Jeffrey Bergeron, the fear is losing a certain quality of life.

"I think the frustration we're having," he said, "is we all feel we're getting crowded out of what we've been doing all along, and it's not fair."

Copyright 1999 The Denver Post. All rights reserved. This material may not be published, broadcast, rewritten or redistributed.

Return to Top
Return to News
Return to Post Home

W11990

THE DAILY SENTINEL
George Gibson, Editor and Publisher
Dennis M. Bacon, Managing Editor Bud Winslow, Operations Director
Bob Silbernagel, Editorial Page Editor
Marc R. Mesierve, City Editor
Lauren Mayer Dees, Editorial Board

Editorials

Yes to Alternative D, with minor tinkering

Few expanses of public lands offer the beauty, access, variety of terrain and hove as many human visitors or as much economic impact as the 2.2-million-acre White River National Forest that stretches from Colorado's Continental Divide to the eastern edge of Mesa County. Little wonder then, that the congressionally mandated requirement to update the 15-year-old management plan for the forest has generated intense public debate.

The public comment period for the draft ends on May 8.

The planning effort has produced management proposals as different as a relatively restrictive plan emphasizing environmental protectionists created by the Aspen Wilderness Workshop to a more multiple-use-oriented plan advanced by 3rd District Rep. Scott McInnis.

McInnis has been pilloried in some quarters for advancing what critics maintain is a reactionary plan that serves so-called special interests — read that, ski areas, timber interests and the motorized vehicle lobby. In point of fact, there is much to like in McInnis' plan, which was drawn up largely by two retired foresters: former White River Supervisor Richard "Woody" Woodrow of Glenwood Springs and Bob Cron, a retired Gallatin National Forest ranger who lives in Grand Junction and who played a key role in developing the Mesa County/Grand Junction Riverfront Commission's Legacy Project plan.

...proposal is — which, by the way, will be accepted by the Forest Service as one of thousands of official "comments" — the agency's preferred Alternative D remains the best option, with a few important qualifications.

Although the issue of water bypass flows isn't specific to any of the various management plans under consideration, the concerns of McInnis and many in Colorado's water community are understandable. That is the mandate that individuals or municipalities with water facilities on the forest give up a portion of their water to enhance stream flows on the forest. The requirement, while fundamentally appealing in terms of ecosystem protection, is a direct contravention of Colorado water law and fails to recognize that many of the water rights in question predate the establishment of the national forests.

However, that issue is not likely to be decided locally. Forest Service officials in Washington seem intent on pressing the issue throughout Colorado and forcing the state to challenge the practice in court.

The Forest Service should also reconsider the blanket prohibition on all ski-area expansion outside of existing boundaries currently in Alternative D. That is not to say ski areas should expand throughout the forest with little regard to the environmental consequences. But some expansion — such as undeveloped terrain on the west wall of Vail's back bowls toward Minturn — may make sense and have little environmental impact. McInnis' plan would allow the Forest Service to at least consider such expansions, with appropriate environmental studies.

It should be noted that McInnis, his staff and volunteers, put a tremendous effort into their proposal, meeting with a variety of groups and individuals. The congressman might easily have adopted the position of naysayer, carping from the sidelines about the Forest Service plan while offering no constructive ideas of his own. Its chief — not to do so. The primary problem with his effort is he did not begin it earlier in the planning process, leaving the appearance that it was a last-minute attempt to derail the Forest Service plan.

Unfortunately, the McInnis plan — as of 18 days ago when the congressman met with The Daily Sentinel's editorial board — was woefully vague on what we feel is the most critical issue facing the White River National Forest: widespread abuse of the forest resource through virtually unrestricted off-road vehicle use.

The McInnis plan would require ATVs to stay on existing, signed trails, a much-needed requirement. But there was no indication of the actual miles of trails in his plan.

Alternative D, on the other hand, would close some 360 miles of what are largely ad hoc trails blazed by ATVs and motorcycles over the past 15 years. But it would still leave more than 1,600 miles of trails exclusively for these recreational vehicles. It would also cut the trails open to mountain bikes from 2,800 to 1,700 miles. It is a reasonably balanced effort to control a forest use that virtually did not exist the last time a White River National Forest management plan was adopted.

Alternative D also takes a reasoned approach to such things as grazing (limiting only allotments that are no longer in use) and wilderness preservation (increasing the existing 750,000 acres only modestly to 800,000).

Forest Supervisor Martha Ketelle and her staff have done a good job attempting to balance the diverse human demands on the forest with its biological requirements. With some minor tinkering — tinkering that should include the best of McInnis' detailed input — Alternative D merits adoption and implementation.

8B The Daily Sentinel • Friday, September 10, 1999

McInnis seeks extension of period to comment on White River plan

By PAULA D. VICEK
The Daily Sentinel

U.S. Rep. Scott McInnis Thursday called for a likely extension to the public comment period for the White River National Forest Plan, so the public can thoroughly review what he called as "enormous 14-pound proposal."

Released last month, the plan details how the U.S. Forest Service will manage the forest's 2.27 million acres, which stretch from Battlement Mesa to the Continental Divide, for the next 10 to 15 years.

Forest Supervisor Martha Ketelle said she's open to extending the comment period but hasn't yet spoken with McInnis, R-Colo. Last week, she extended the comment period by one month.

Some 3,100 copies of the document have been distributed already, and the forest service has ordered a second printing because of intense interest, Ketelle said.

The sheer size of the forest plan, coupled with implications the plan will have on its large portion of land in western Colorado, seems fairer an extension of the period people can offer comments, McInnis said.

"There's no way the forest service could reasonably expect anyone to digest this enormous proposed proposal and then in turn formulate a response in only 90 days," McInnis said. "If this deadline isn't extended, the legitimacy of whatever decision the forest service ultimately reaches will be seriously called into question."

Public meetings held throughout the region have attracted between 40 and 300 people each, Ketelle said.

"We're hearing from a lot of people and that's good," Ketelle said.

Ranked fifth in the United States in recreational use, the White River National Forest contains 64 percent of Colorado's skiing acreage and eight of the state's highest mountains.

■

Marijo B. Nader can be reached via e-mail at mnader@gjsen.com.

W11990



44 September 5, 1999 • Eagle Valley Enterprise

ENTERPRISE Opinion

Root for locals in showdown over Forest Plan

We're headed for a showdown between the feds and locals over the new Forest Plan. We'd better root for the locals.

Eagle County Commissioner Tom Stone said last week he's ready to do battle with the U.S. Forest Service over the

SCOTT N. MILLER

National Forest. Stone contends a 90-day review period simply isn't enough for a document that's more than two years in drafting and weighs about 14 pounds. It's also not enough when you consider that management decisions on the national forest in this area will have a direct or indirect impact on virtually all other property in Eagle, Summit and Pitkin counties.

White River federal officials say getting more than 120 days for review of the plan will require Herculean efforts, even a mere educated guess as to the level of effort is hard.

Stone is ready to help, and District Representative Scott Miklosz has congressional intervention over the plan.

And he isn't alone in his concern over the relatively brief comment period.

Colorado Counties Incorporated, a statewide lobbying group, is ready to ask for a one-year extension on the comment period, as are various other private and public agencies. Even the governor's office has been inundated with requests for an extension.

And, lest you think that the folks in Washington, D.C., are deaf to the concerns of the Colorado Rockies, the following, courtesy of the Colorado Rockies Forest Protection Council:

"Several separate measures take aim in Senator Dorgan's office to limit the draft White River Travel Management Plan ...

"Concerned measures where could write letters and attend the open houses, asking that the Travel Management Plan be delayed until a thorough public process is undertaken. The Forest Plan never does have to be approved unless ahead so bikes to restricting bikes to trails open roads only. This is a trend in National Forests around the country, and is not necessarily a problem for mountain bikers. In fact, mountain bikers should be delighted to see the Forest Service take a hard look at where mountain bikes are appropriate and where they are not. Mountain bikers have been the most vocal group in demanding that certain trails be closed to bikes. Now the Forest Service is responding to that demand by looking at the entire system and designating the trails that are appropriate for bikes. Unfortunately, WRNF never sat down with user groups to determine which trails were important to users and the wildlife concerns could be addressed while preserving a functional trail system.

At your request, before the U.S. Forest Service seeks to provide more, not less, motorized opportunities on land owned by all of us. It's possible to have hiking and equestrian environmentally and environmental responsible ways. And while many new groups and organizations, current policy is being largely dictated by politically active, well-organized by people whose idea of "multiple use" is hiking and mountain bikes.

Yes, it's hard to find, much less work with, the few, but America has multiple use all public lands, and a vital component of that is motorized use.

And with plan revisions coming up for three other national forests in Colorado in the next four years, it's time to find that line in the White River National Forest now, then use that model through the rest of the state. And the place to start is with the comment period. The longer the comment period is extended, and the more input there is through the meaningful revision, the better off the plan as a whole will be.

W11990

PROCESS FOR DEVELOPING THE BLENDED COMMENT TO THE FOREST PLAN

Introduction

Immediately upon the unveiling of the White River National Forest Preferred Alternative, Alternative D, Congressman McInnis received a tremendous amount of input from a broad range of people interested in and impacted by the management of what is one of the nation's largest and oldest forests, as well as one of the top forests in the country for recreation and wilderness.

The input centered on four principle concerns with the direction of Alternative D, which envisions that a higher priority be given to physical and biological resources than to human uses of the Forest." (*Summary of the Draft EIS, p.14).* These concerns focused on four primary topics –

1) the attempt to circumvent Colorado's well-established water system,
2) a failure to recognize the diversity of the Forest,
3) the potential negative impact on the mountain economy, and
4) an unbalanced emphasis on very limited uses at the expense of multiple use and the historic mission of the Forest.

The initial action taken by Congressman McInnis was to request an extension of the period for comment on the Forest Plan. It was immediately apparent that the time and effort it would take to fully digest and offer meaningful comments to the Forest Plan would require additional time beyond the original time period set. The Congressman requested, and the Forest agreed to extend the comment period. The comment period was again extended by Senator Campbell to the current date of May 9, 2000. This additional time was required to fully allow the large constituency of the White River National Forest to comment about the Forest Plan.

Because of these concerns, Congressman McInnis felt a theme of Forest use and Forest rest was in order and sought out local input from the communities as to how to bring a more common sense approach to the Forest Plan: this Plan would seek a balance between use of the Forest while properly protecting the resources of the Forest. It is the in the interest of the Congressman and the Third District to work toward making a positive contribution to the Forest management and not take an adversarial position. First, Congressman McInnis sought out the expertise of Richard Woodrow, former Forest Supervisor for the White River National Forest. Mr. Woodrow managed the White River National Forest when the current forest plan was drafted, served as the Assistant to the Director for Recreation in Washington D.C., and is an acknowledged expert on the Forest. Mr. Woodrow brought with him a widely acknowledged breadth of expertise regarding the Forest.

Water

Water is an area and issue that is non-negotiable to the Congressman: the federal government must respect Colorados process. As a result, Congressman McInnis sought out the expertise of the Colorado River Conservancy District to provide professional input on the appropriate way that the Forest should deal on issues of water in Colorado. Water in Colorado is of paramount importance, and the Colorado system of water rights is among the most developed in the country, if not the world. The Colorado River Conservancy District contributed the language indicating that the Forest should operate as part of the Colorado water system and not try to circumvent that established state process for instream water flows. The Congressman is firm in his position that the federal government not circumvent, ignore or preempt Colorado law that applies evenly to all Colorado water users.

Community Input

The Congressman also sought out input from sources on the ground, the county and local communities who live on and around the Forest. These are the communities most directly impacted by decisions made about the future of the Forest. Counties, including Eagle, Garfield, Mesa, Pitkin, Rio Blanco and Summit, were invited to submit their own county-specific information about the distinct management of the Forest and how the Forest Service could work in conjunction with the communities in which the Forest is located. Each of the counties responded as the county deemed appropriate, including several counties that held numerous public meetings and developed complex comments of their own for incorporation in Congressman McInnisblended alternative. For example, Summit County set up a number of public meetings to gather additional public input, and has put particular effort into finding an appropriate balance especially in sensitive forest/urban intermix, a prescription that was not addressed in Alternative D.

What is paramount here is that each county represents a very different set of management prescriptions; Rio Blanco County has a very different set of issues than Summit County, and those differences should be considered when setting out the way the Forest will be managed. A corollary to that point is that each community within the counties has different concerns. The Forest Plan should be a vehicle to bring communities and interests together, and a process that is driven from the ground up is a means toward achieving a Forest Plan that unifies.

A wide range of input was provided to Congressman McInnis, including taking into consideration what represents a complete set of recommendations from environmental groups in the form of Alternative I. This process was ongoing through the entire comment period, and continued right up until this Blended Alternative was submitted in May. Meetings to outline the county-by-county prescriptions and materials continued to take place in dozens of communities before the final version is submitted in May, with input being taken and translated into a

W11990

PROCESS OR DEVELOPING THE BLENDED COMMENT TO THE FOREST PLAN

Forest Plan that provides management sensitive to the differing communities that make up the White River National Forest. Unlike the perception of the Forest Service meetings, where some citizens came away with the feeling that Alternative D as the preferred alternative was not open to amendment or change, these meetings were intended to solicit additional input and changes were subsequently made based on the input of the meetings with communities.

A partial list of the communities and elected officials to whom staff presented briefings and/or sought input on the Blended Alternative in either direct meetings or though meetings of intergovernmental organizations includes:

Eagle County
- Avon
- Gypsum
- Minturn, Redcliff invited
- Town of Vail

Garfield County
- Basalt
- Carbondale
- Glenwood Springs
- Rifle
- Silt

Mesa County

Moffat County

Pitkin County
- Aspen

Rio Blanco County
- Meeker

Summit County
- Dillon
- Breckenridge
- Frisco
- Silverthorne

Economy

The communities in and around the Forest, as well as those who live in those communities, are directly tied to the Forest economically. Recreation (skiing, rafting, mountain biking, hiking, hunting and many other activities) provides at least

35,000 jobs directly, the Forest Service indicates recreation provides $721 million annually to the local economy. Through the operation of the economic multiplier in the communities, the Forest provides employment to thousands more living in the mountains. For example, the direct impact of jobs providing rafting opportunities to visitors is the income paid to employees of the rafting company. That income is then, in turn, spent by those employees in the local economy. Employees of restaurants, stores, and a myriad of other businesses derive their income from the Forest and the money spent there.

Congressman McInnis incorporated the concerns about how to manage the Forest so as to respect the amount of economic support the Forest provides surrounding communities. A management plan that ignores the importance of recreation to these communities'and families'economies by relegating multiple use to secondary consideration does not serve either the Forest or the communities.

Balanced Approach to Multiple Use

Congressman McInnis heard concerns that the approach the preferred alternative, Alternative D, took ignored the traditional diversity of uses for which the Forest was historically managed. For many generations, the Forest has been a hub of outdoor activity, attracting recreation and nature enthusiasts from throughout the United States and the world. Moreover, the signs that welcome a visitor to the White River National Forest read 'Welcome to the White River National Forest -- Land of Many Uses." The National Forest Management Act specifically calls for a policy of multiple use in management plans under, specifically stating:

> "[in developing, maintaining and revising plans for units of the National Forest System pursuant to this section, the Secretary shall assure such plans – (1) provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with the Multiple-Use Sustained-Yield Act of 1960 [16 U.S.C.A. §§528-531], and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness." (16 U.S.C.A. § 1604(e)).

Alternative D inadequately balanced this fundamental consideration for the management of the Forest. In contrast, the policy of multiple use on the Forest is carried throughout the Blended Plan. It is important to remember that multiple use does not mean that the federal land which makes up the Forest will somehow be lost; in fact the Forest Service will apply rigorous management standards to the Forest and through those prescriptive management standards and guidelines can ensure the Forest is managed in a way to ensure it is available to current and future generations. The Congressman believes people have the right to use the Forest but have no right to abuse the Forest.

W11990

PROCESS OR DEVELOPING THE BLENDED COMMENT TO THE FOREST PLAN

One third of the White River National Forest is designated as wilderness, which is a very limited and narrow management prescription. The other two thirds of the Forest is managed by the Forest to serve a variety of goals, but the Forest will remain available and accessible to future generations to pursue outdoor recreation and a multitude of activities in balance with the Forest. The Blended Plan more fully reflects the Forest's time-honored multiple use values.

A Decision of Conscience, Not Convenience

It is clear that the most politically expedient choice available to Congressman McInnis would have been to sit on the sidelines, offering only criticism of Alternative D without seeking a positive solution. Indeed, Congressman McInnis has been the subject of intense personal criticism from individuals on both extremes of this debate. Instead, this Blended Alternative reflects a positive attempt at finding a more balanced way to manage the Forest. Rather than offering criticism alone, Congressman McInnis'Blended Alternative offers both constructive feedback and a balanced management plan geared toward compromise. This Blended Comment reflects a tougher choice to enter the arena with a positive alternative and the enormous effort that such an undertaking entails.

Acknowledgments

This Blended Comment, submitted by Congressman McInnis, includes contributions and reflects comments by a large number of groups and individuals whose expertise provided the on-the-ground input. This Blended Comment was built from the ground up, including direct input offered by communities, groups and concerned individuals.

In addition to the large number of local communities who offered comments and input, the following individuals and groups deserve acknowledgment for their contributions, comments and input:

Speaker of the Colorado House, Russell George
State Senator Dave Wattenberg
State Representative Diane Hoppe

Club 20 — NW Colo. Council of Governments
Associated Governments of NW Colorado
Colorado Counties, Inc. — Colorado Big Country
Colorado River Conservancy Dist. — Colorado Water Congress

W11990

PROCESS OR DEVELOPING THE BLENDED COMMENT TO THE FOREST PLAN

Finally, staff from Congressman McInnis'office attended the following Forest Service Open Houses to discuss the Forest Plan, and received input during those meetings:

Carbondale	Denver
Eagle	Frisco
Glenwood Springs	Grand Junction
Meeker	Rifle
Vail/Avon	

The Blended Alternative is a result of collaborative efforts by literally hundreds, if not more, individuals and groups and local and county governments to produce a comment and an alternative which has support at the local community level. By working with local communities, from the ground up, the Blended Alternative brings with it the involved commitment of those local communities who helped shape the comment. In that way, the Blended Plan should serve to bring the community together.

W12889

Summit County Board of County Commissioners
Executive Summary
White River National Forest Plan

Overall Theme of the Forest Plan: The Summit County Board of Commissioners support an alternative theme which reflects and represents a balance of human uses with ecological considerations.

Trail Closures: The Summit County Board of County Commissioners agrees that all trails and roads should be closed unless marked open in the National Forest recognizing that this designation does not prohibit off-trail use of the forest for pedestrians. A combination of approaches (e.g., including new trail construction, seasonal and permanent closures, rerouting) are needed to create a sustainable trail system. The use of best management practices needs to be required to minimize impacts of horses on the trail system.

Travel Plan: The Summit County Board of County Commissioners strongly support the separation of the travel plan from the forest plan to allow for more local scoping without the current snow cover.

Vegetation Management: The Summit Board of County Commissioners oppose the timber harvest goals proposed in the preferred alternative as this would result in a disproportionate amount of tree removal and construction of roads in our National Forest.

Roadless Areas: The inventoried roadless areas in the Forest Plan/DEIS should receive management prescriptions that maintain their roadless character and several of those roadless areas should receive a Recommended Wilderness prescription.

Aerial Transportation Corridors: We are not in support of aerial transportation corridors as proposed under several alternatives but feel that allowances need to be made in the Forest Plan to accommodate a fixed guideway system and other potential local transportation needs.

Local Coordination: The Forest Plan should specifically require that planned uses on the national forest are coordinated with local government and that permitting of forest uses is consistent with locally adopted master plans.

Water: The County strongly objects to the plan's method of achieving the goal of providing sufficient instream flows and encourages the Forest Service to remove the Forest Plan language regarding obtaining water rights through special-use permit authorizations.

Ski Area Expansion: The Summit County Board of County Commissioners feel that some ski areas should be allowed to expand beyond their current permit areas once a clearly articulated and justified need is determined. The expansion will be required to meet the requirements of the National Environmental Policy Act (NEPA) and the Federal Land Policy Management Act (FLPMA), including those portions of the act requiring the examination of potential off site impacts and that the expansion interfaces with existing local master plans.

Telecommunications: The Forest Plan needs to include a discussion of the importance of telecommunications and the plan needs to include provisions to allow for suitable telecommunications sites in various and sometimes remote areas of the national forest.

Vacant Grazing Allotments: Grazing activities are generally consistent with the rural character of the Lower Blue River Basin. Vacant grazing allotments in the remaining three basins of Summit County (Ten Mile, Snake, and Blue River above Dillon Reservoir) should be closed to grazing activities.

Snowmobile Use Areas: The Summit County Board of County Commissioners agrees that snowmobile use that is currently allowed for the areas of Vail Pass, the Swan River Basin, and the Miner's Creek area continue under the new Forest Plan. Summit County is currently working with the Forest Service, other local governments, and local user groups to establish a Winter Travel Management Plan that will hopefully facilitate recreational access to these areas and minimize user conflicts.



W12889

BOARD OF COUNTY COMMISSIONERS

970-453-2561
fax 970-453-3535

Post Office Box 68
208 East Lincoln Avenue
Breckenridge, Colorado 80424

April 24, 2000

Ms. Martha Ketelle
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Re: Revised White River National Forest Land and Resource Management Plan and Draft EIS

Dear Ms. Ketelle:

Please accept these comments on the proposed Revised White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). Our comments are representative of the views of the citizens of Summit County as a whole. We have made great efforts, including over 600 hours of staff time and countless hours of time volunteered by community residents, to work with local citizens to develop consensus views on the proposed Forest Plan. The Forest Plan is of great interest and concern to us because over 73 percent of the land in our County is within the White River National Forest. We request that you carefully consider these comments as you develop the final White River National Forest Plan and give special weight to the comments as they reflect the views of our 20,000 residents. We recognize that the different counties in the White River National Forest may at times have very different needs related to management of the national forest. Our comments focus on the needs of the Dillon Ranger District.

We would like to commend the efforts of the Forest Service in undertaking the monumental task of developing a plan for the entire forest. The 1984 Forest Plan is dated and definitely needed to be revised. We would also like to extend our appreciation to Jamie Connell and the employees of the Dillon Ranger District who participated in the numerous public meetings that were held on the Forest Plan in Summit County. Finally, we want you to know that our interest in the Forest Plan goes beyond the current Forest Plan/DEIS review and we would like to extend an offer for our continued participation in working with the Forest Service to develop the final plan.

Since the Forest Plan was first released in August, 1999, a series of public meetings have been held to gather public input on the proposed plan. Each of the four basin planning commissions, the Summit County Open Space Advisory Council, and the Countywide Planning Commission held a minimum of three meetings each for the purpose of discussing the plan and generating public comment. At the meetings a host of issues related to the Forest Plan were discussed. In December, the Board of County Commissioners started a series of public meetings on the Forest Plan also, reviewing the recommendations of the planning commissions. So far, in total the County has held 24 public meetings to specifically address and gather public input on the Forest Plan. This does not count the numerous other meetings held by other groups in the County. Despite divergent interests, consensus has been reached on most issues discussed to date. Therefore, we feel the comments that we are forwarding truly reflect the views of this County's populous. Exhibit C includes attached copies of all the letters that we have received from the public concerning the Forest Plan. Exhibit D includes copies of the recommendations of each of our planning commissions and the Open Space Advisory Council. We anticipate

that some of the incorporated municipalities (i.e., Breckenridge, Frisco, Silverthorne, Dillon, Blue River, and Montezuma) will send their own comments under separate cover.

As might be expected with any project of this magnitude involving alternatives, there has been a fair amount of criticism aimed at the preferred Alternative D. Numerous groups have spoke out in favor of other alternatives. In our review, however, we have found that all of the alternatives (including D) appear to have both positive and negative aspects. As such, Summit County does not feel that one alternative should be chosen or endorsed, but rather the final Forest Plan should reflect the best parts of all the alternatives. Thus, our comments that follow will focus on the approach that makes most sense for a specific subject area, regardless of the alternative. Our comments will occasionally reference Alternative D because of its status as the preferred alternative. We do feel that a general theme should apply to the final Forest Plan and that theme should be to "walk lightly on the land." In other words, human activities should occur in balance with the health of the forest ecosystem.

The recommendations that follow are grouped under major issue headings such as "Trails and Recreation". The numbering used does not correspond with Forest Service management prescriptions. We have kept these recommendations brief so the focus is on key issues. Please refer to Exhibit A for more detailed background and explanations for each of the numbered recommendations.

Trails and Recreation

1.1 Areas that are currently managed for non-motorized uses should have management prescriptions that maintain their non-motorized character and maintain their existing trail densities.

1.2 The following approach should be taken towards "non-system" trails:
- a. Reroute trails around environmentally sensitive areas (i.e., wetlands, critical habitat areas), or if necessary obliterate trails to avoid environmental impacts.
- b. Increase efforts to identify and improve existing trails for inclusion in the national forest "system".

1.3 The following approach should be taken towards trails recreation:
- a. Maintain important trail connections and trail loop opportunities, and where consistent with ecosystem protection maintain trail densities for both system and non-system trails.
- b. Utilize a combination of trail closures; trail reroutes, seasonal closures, and new trail construction.

1.4 Standardize and improve signage of County trails.

1.5 We endorse the "closed unless designated open" policy with the caveat that the inventory of roads and trails on the Dillon Ranger District is completed and analyzed to ensure trails are not closed simply by omission from the Travel Management Plan.

1.6 The inventory of trails on the National Forest needs to be completed. We recommend that the Forest Service review the detailed inventory of trails provided by the Summit Fat Tire Society to assist in completion of the travel management plan inventory.

1.7 Horse traffic should be separated out from foot traffic in the Travel Management Plan—the two uses have potentially different impacts. Much of the trail damage caused by horse traffic could be avoided if the Forest Service would more closely monitor and control outfitter guide operations. The Summit County Board of County Commissioners recognizes the fact that horse and foot traffic have different levels of impact on forest resources, and questions the proposed policy that horse traffic be permitted freely anywhere off trail. The Board also recognizes that some off trail horse traffic is necessary for hunting purposes. In addition, the Board believes that a significant amount of impact from horse traffic in Summit County results from commercial horse operations using areas repeatedly for day and overnight guided trips. The Board recommends seasonal and permanent closures to horses on trails where significant impacts to physical resources are likely to occur. Secondly, the Forest Service needs

closer monitoring and capacity studies to make decisions on equestrian outfitter guides and their impacts to the National Forest.

1.8 Intergovernmental coordination should be mandatory when addressing trail management issues in areas of interspersed public and private lands.

1.9 The Travel Management Plan should be separated out from the rest of the Forest Plan to allow more time for inventorying and development of final Travel Management Plan recommendations.

1.10 We endorse the closure of trails that are duplicative within a travel system for an area. Specifically, roads and trails that function primarily as connections to the same destination as parallel roads and trails in the nearby vicinity should be closed to improve overall forest health. However, such closures should only apply in instances where the trail in question does not serve a broader recreational function. Specifically, if the road or trail serves to separate uses, offer a loop opportunity, or function as an important connection, other management tools should be considered by the agency before a permanent closure is applied.

1.11 Seasonal closures should be emphasized rather than year-around closures.

1.12 There is a need for adequate trail maintenance and trail enforcement.

1.13 Mixed private and public ownership along trails or current lack of established access should not be used as justification for trail obliteration, as substantial local efforts are underway to secure access and address these conflicts.

1.14 The snowmobile use that is currently allowed under Alternative B for the areas of Vail Pass, the Swan River Basin, and the Miner's Creek area should continue under the new Forest Plan. Summit County is currently working with the Forest Service, other local governments, and local user groups to establish a Winter Travel Management Plan that will hopefully facilitate recreational access to these areas and minimize user conflicts.

1.15 The Forest Service needs better monitoring and enforcement of special use permit conditions to ensure the long term quality of our Forest and permitees should bear responsibility for the impacts they create.

Trails Administrative Issues and Concerns:
In addition to the trails and recreation issues discussed above, Summit County also has a number of specific issues and concerns that we have in our capacity as an acting land manager. These issues and concerns are outlined in Exhibit B. The Forest Plan will have implications on how we manage our current recreational amenities, including the Summit County Recreational Pathway System, County owned trailheads and trails, and future projects, such as the Swan Mountain Bikepath Proposal. Summit County's recreational trail system transcends jurisdictional boundaries. For example, a visitor may typically park at a County owned trailhead, travel on a County trail easement for a mile or two to reach a National Forest Trail or opportunity. Thus, our recommendations aim to achieve seamless management between private, county, and federal lands in order to reduce management problems and create a better recreational system for our residents and guests.

Staff research indicates there are several prescriptions and travel management strategies within the Forest Plan that do not correspond with the County's current recreational management activities in those areas. Exhibit B details these areas and provides recommendations.

Vegetation Management

2.1 Vegetation management should be focused towards improving habitat, biodiversity, and forest health using a less aggressive approach than outlined in Alternative D, emphasizing selective use of vegetation management only in those areas deemed important for these focuses. The goals of stewardship and sustainability should be emphasized rather than short-term goals of habitat improvements for individual species. Timber harvest activities should explicitly demonstrate wildlife benefits, as outlined in the initial scoping recommendations of the Colorado Division of Wildlife.

W12889

2.2 The Forest Service should reevaluate and reduce the proposed goals for harvesting in the Blue River basin (i.e., 45% of the total harvest on the White River National Forest under Alternative D) to better reflect current land uses, community goals, and Master Plans. The volume of timber harvest in the first decade should not exceed the much lower volume (i.e., 200 to 300 acres total in the first decade) as suggested in several alternatives in the revised Table 3-7 of the DEIS.

2.3 Timber harvest should be limited to areas with existing roads. Temporary roads should not be created due their potential for long-term use and degradation of natural resources.

2.4 Vegetation Management should not be justified for monetary (budgetary) purposes or to meet timber harvest volume goals in areas designated as wildlife prescriptions.

2.5 Clearcuts should be avoided to the maximum extent because of their environmental impacts and their incompatibility with visual and recreation goals of community Master Plans.

2.6 Forest harvest activities should be compatible with water quality regulations for phosphorous loading in Lake Dillon and should be consistent with County established stream/wetland setbacks. Clearcuts should be avoided to the maximum extent because of their potential to increase sediment and nutrient loading in streams and reservoirs. The Forest Service should require monitoring of all timber activities to ensure that phosphorous and sediment loading in streams/lakes does not increase as a result.

Roadless Areas

3.1 At a minimum, all existing roadless areas should have a management prescription that maintains their roadless character.

3.2 The Acorn Creek and Ute Pass roadless areas should receive a Recommended Wilderness designation.

3.2 The Black Lake West and Black Lake East roadless areas should receive a Recommended Wilderness management prescription. However, the boundaries of the management prescription should be sufficiently set back from the Black Lake access road to ensure that the private landowners in the area maintain the ability to access their property.

3.3 The Vail Pass roadless area should receive a management prescription that recognizes the existing winter motorized use that occurs in the area.

Aerial Transportation Corridors

4.1 The County does not support the location of any aerial transportation corridors as proposed in certain alternatives of the Forest Plan DEIS.

4.3 There needs to be allowances made in the Forest Plan for the potential future location of a fixed guideway system traversing Summit County, potentially from Loveland Pass on the east to Vail Pass on the west. A broad swath should be given a management prescription of 8.32 Designated Utility Corridor—Existing and Potential from the Loveland Pass area to the I-70 corridor, in such a manner that a plan amendment would not be required to allow the exact placement of the fixed guideway system.

4.3 In addition to the above-described fixed guideway corridor, the Forest Service should make other allowances for potential fixed guideways or roadways in the Forest Plan. Examples of these could be new alignments for Hwy 9 from Frisco to Breckenridge, that would potentially cross national forest land near Ophir Mountain. Such future transportation needs should somehow be addressed and accommodated for in the Forest Plan.

Local Coordination

5.1 The Goals/Objectives and Standards/Guidelines sections of the Forest Plan should specifically state that the Forest Service will coordinate planned activities/uses with local government and that the Forest Service in cooperation with local government shall review proposed projects (i.e., special use

permits) to ensure consistency with local master plans. We suggest that language similar to the following be included in the Forest Plan:

Under Goal 3.4 Public and Organizational Relations, of the Goals and Objectives section of the Forest Plan:
"Objective 3.4d. Cooperatively work with local governments to address issues of common concern and to the maximum extent possible maintain consistency with locally adopted master plans."

Under the Standards and Guidelines section of the Forest Plan include the following to implement the above goal:
Standard: To the maximum extent possible, ensure that national forest management decisions are consistent with locally adopted master plans.

Guideline: Forest service special use permits shall be referred to local government and local planning commissions for comment. Use permits shall not be issued unless the proposed activity and related on-site and off-site impacts maintain consistency with local master plans.

5.2 Some consideration needs to be given to use of a management prescription in urban interface areas of the County that more adequately addresses the urban forest management issues that these areas present.

5.3 Summit County Government, the Town of Breckenridge, Continental Divide Land Trust, and the U.S. Forest Service Dillon Ranger District have worked cooperatively over the past fifteen months to develop a backcountry protection strategy for the Golden Horseshoe area, just northeast of Breckenridge. We request that the Forest Service incorporate the March 2000 Golden Horseshoe Backcountry Protection Strategy report by reference in the final Forest Plan so that the management recommendations developed in this collaborative process can be utilized for future federal land resource management, conveyance/acquisition decisions, and permitting decisions in the area. This report has been endorsed by the Summit County Open Space Advisory Council, Breckenridge Open Space Advisory Commission, and Board of Directors for the Continental Divide Land Trust.

Water Issues

6.1 The County strongly objects to the method of achieving the goal of providing sufficient instream flows through extortion in the issuance or renewal of special-use permits which appear to be authorized in the wording of objective 1.1.0. The County encourages the Forest Service to remove the following wording from objective 1.10, "*... or establish instream flow protection measures in special-use authorizations*". Please refer to Exhibit A for more explanation of our objection to this wording.

Ski Area Management Prescriptions

7.1 The Summit County Board of Commissioners feel that some ski areas should be allowed to expand beyond their current permit areas once a clearly articulated and justified need is determined and provided further site-specific analysis determines that such expansions are appropriate. The County cannot determine the appropriateness of any ski area expansions beyond existing permit boundaries without further information. However, a larger amount of discussion received at public meetings centered on this very issue. Please see attached comments of the public in Exhibit C and planning commission comments in Exhibit D. The appropriateness of any actual ski area expansion will need to be determined at a later date when the actual expansion is proposed, a full environmental review pursuant to the National Environmental Policy Act is completed, and the Federal Land Policy Management Act is complied with completely. Efforts currently being pursued by the Northwest Colorado Council of Governments to assess the social and economic impacts relating to activities on lands administered by the Forest Service may help establish thresholds relating to the appropriateness

W12889

White River National Forest Plan
April 24, 2000

of ski area expansion. Any proposed ski area expansions should also be reviewed to ensure that the proposal is consistent with locally adopted master plans.

7.2 A variety of potential on-site and off-site impacts can be created by ski area expansion. We request that the Forest Service fully utilize the federal requirements for forest planning and environmental review to ensure that all impacts associated with ski area development are fully identified and addressed in any expansion effort. If the U.S. Forest Service fully utilizes this authority, then it should be unnecessary for the County to create a similar review process to address these issues.

7.3 The Management Area Direction section of the Forest Plan should clearly articulate that 8.25 is the only prescription that allows for developed downhill skiing complexes.

Telecommunications

8.1 The Forest Plan needs to include a discussion of the importance of telecommunications and the plan needs to include provisions to allow for suitable telecommunications sites in various and sometimes remote areas of the national forest.

Vacant Grazing Allotments

9.1 Grazing activities are generally consistent with the rural character of the Lower Blue River Basin of Summit County. We support maintaining the potential for grazing on vacant range allotments north of Silverthorne.

9.2 Vacant grazing allotments in the remaining three basins should be closed to grazing activities. Retaining the potential for open grazing in the upper Ten Mile, Blue River, and Snake River basins is inconsistent with current land uses and may result in cumulative impacts to fragile ecosystems already under heavy pressure from human use.

Finally, we would like to commend the Forest Service on your efforts in developing a new forest plan for the White River National Forest. We know this has been an enormous task. The 1984 plan is outdated and definitely needs to be revised. We support your efforts to accomplish this. Please then take the comments we have provided in the constructive manner in which they are intended. We think that working together with the local communities, we can craft a plan that addresses local needs while preserving the forest for future generations of humans and wildlife.

Sincerely,

Gary M. Lindstrom
Chairman

William C. Wallace
Commissioner

Thomas A. Long
Commissioner

cc: Lyle Laverty, Regional Forester
Jamie Connell, District Ranger
Senator Wayne Allard
Senator Ben Nighthorse Campbell
Representative Scott McInnis
State Senator Bryan Sullivant
State Representative Glenn Scott
Robert Taylor, County Manager
Steve Hill, Community Development Director
Jim Curnutte, Planning Director
Gary Severson, Northwest Colorado Council of Governments

Exhibit A

Explanation/Background on Summit County Comments

The following provides more detailed comments related to the proposed White River National Forest Land and Resource Management Plan and Draft Environmental Impact Statement (DEIS). The intent of these comments is not to support any particular alternative in the DEIS, but rather to identify the best strategy for addressing each major issue. The numbering corresponds with numbering on the official County response letter submitted by the Summit County Board of Commissioners.

Trails and Recreation

1.1 Within the Summit County portion of the White River National Forest, there are very few areas that offer non-motorized opportunities outside Wilderness. Non-Wilderness, nonmotorized backcountry offers opportunities solitude and primitive experiences that are characteristic of Wilderness, but allow a greater number of uses, such as mountain biking and hangliding. The public endorsed the current trails located in these nonmotorized areas for inclusion into the travel management plan. These areas should maintain non-motorized management prescriptions.

1.2.a Rerouting trails is just one tool recommended by Summit County to create a sustainable and functional trail system. We do not endorse trails that cross environmentally sensitive areas. Rather, we urge the Forest Service to make an attempt to reroute such trails around the environmentally sensitive areas rather than eliminate the trail all together.

1.2.b Given the increasing population and urbanization of Summit County, more trails may be required for inclusion into the national forest system in order to meet the demand, disperse use, and reduce impacts to the limited number of trails currently in the system.

1.3.a We have taken a comprehensive view of the trail system in Summit County, and have concluded that trail closures are acceptable where necessary, as long as key connections and opportunities are maintained throughout the system.

1.3.b The Planning Commissions urge the Forest Service to use a combination of tools to maintain and enhance the overall trail system for a variety of trail users. These tools may include trail closures, trail reroutes, seasonal closures, and new trail construction.

1.4 In our public meetings on the Forest Plan, we received many comments regarding the inadequacy of signage on the Dillon Ranger District today. Greater compliance and minimized impact is possible if signage were improved for accuracy, consistency, and content.

1.5 We endorse the policy of trails being closed unless signed open in hopes that the strategy will be more efficient, more enforceable, and be more cost effective to tax payers. However, we feel that this policy cannot be effectively implemented until the inventory of trails has been completed (see discussion below).

1.6 Numerous local governments and user groups have identified the issue of the incomplete inventory for trails presented in the Draft Forest Plan. Trails that are not identified in the Plan are not subject to analysis, and therefore considered closed. Several of the unidentified trails are trails that have been identified by the public as important in other public processes. We request that a more complete inventory be conducted in order to look at trails in a comprehensive, systematic approach. We also recommend that the Forest Service review the detailed inventory of trails provided by the Summit Fat Tire Society to assist in completion of the travel management plan inventory. The Fat Tire Society has spent countless hours identifying trails that are utilized by the public.

1.7 Comments were made during our public review process regarding the issue that horse and foot traffic are "lumped together" in the Travel Management Plan. That is, horse and foot traffic is allowed anywhere, on or off trail, on the Forest (with a few prescription exceptions.) Such a strategy assumes that foot and horse traffic have similar impacts. We question this assumption, and recommend horse travel is given further scrutiny. If necessary, some restrictions should be placed on horse travel to protect ecosystem values. Horse traffic should be separated out from foot traffic in the Travel Management Plan—the two uses have potentially different impacts. The Summit County Board of County Commissioners recognizes the fact that horse and foot traffic have different levels of impact on forest resources, and questions the proposed policy that horse traffic be permitted freely anywhere off trail. The Board also recognizes that some off trail horse traffic is necessary for hunting purposes. In addition, the Board believes that a significant amount of impact from horse traffic in Summit County results from commercial horse operations using areas repeatedly for day and overnight guided trips. The Board recommends seasonal and permanent closures to horses on trails where significant impacts to physical resources are likely to occur. Secondly, the Forest Service needs closer monitoring and capacity studies to make decisions on equestrian outfitter guides and their impacts to the National Forest.

1.8 Summit County is unique in the fact that much of the National Forest access starts on private land. In addition, Summit County has stepped forward in the management of trailheads that access National Forest through acquisition of land and easements for that purpose. Intergovernmental coordination is necessary to manage the myriad of issues that accompany public access across private land.

1.9 Several entities, including the Summit County Board of County Commissioners, the Open Space Advisory Council, and the Breckenridge Open Space Advisory Council, have gone on record to Forest Supervisor Martha Ketelle, requesting that the Travel Management Plan be separated out from the Forest Plan. The request was based on the need for a more complete and accurate trail inventory, field verification, and public involvement. The requesting bodies felt that a separated process would produce a plan that would have greater public buy-in, and hence, greater enforceability. We once again request that the Travel Management Plan be separated out from the Forest Plan.

1.10 In the effort to reduce trail density to protect ecosystem health, we feel that it is reasonable to target those trails that are duplicative in nature (i.e., go to the same destination) when eliminating trails. However, such closures should only apply in instances where the trail in question does not serve a broader recreational function. Specifically, if the road or trail serves to separate uses, offer a loop opportunity, or function as an important connection, other management tools should be considered by the agency before a permanent closure is applied.

1.11 Seasonal closures are a tool available to the Forest Service that is under utilized. Non-recreational values may be protected in some instances through seasonal, rather than year round closures. For example, an area used for elk calving may only need protection from human intrusion during the spring months.

1.12 We recognize that the Forest Service is understaffed and working with minimal resources. However, there is a need for greater trail upkeep and patrolling in order to minimize environmental damage and user conflicts. To achieve this goal, possible solutions include greater funding for the Dillon Ranger District and a greater emphasis on partnerships within the community.

1.13 Several trails in the Travel Management Plan are shown as unanalyzed or closed because of access issues. Summit County does not support the Forest Service closing trails on National Forest because of access issues. Leaving trails open gives more merit and validation to the efforts by local governments to secure those accesses. County Master Plans direct the County to identify historic access points and work with landowners to secure those accesses. Closing important trails due to access issues essentially nullifies those efforts. Moreover, we request that the Forest Service should also work with local governments and landowners to secure accesses for trails that are considered significant by the public.

1.15 Special Use Permits: The plan concedes that current special use permits could not be administered to standard under any of the alternatives. This suggests that there are too many permits given the ability of the Forest Service to adequately administer and regulate those permits. The Forest Service needs better monitoring and enforcement of permit conditions to ensure the long-term quality of our Forest. In addition, permitees should bear responsibility for the impacts they create. For example, outfitter guides who use roads and trails in Summit County for commercial business are not required to do any

maintenance or repair to the recreational infrastructure that they benefit from on the National Forest, such as trails and camping areas. Special Use Permits introduce commercial use onto recreational infrastructure that compete with public (noncommercial) recreational users. The Summit County Board of County Commissioners questions whether the Forest Service should continue to administer more permits than they can effectively manage to standard, and recommend proactive measures that foster accountability to special use permittees and promotes the long term health of the Forest.

Vegetation Management

2.1 Public concern was voiced in over 20 meetings that the aggressive approach outlined in Alternative D would negatively impact wildlife habitat and biodiversity. This public concern is represented by the following statement from the Colorado Division of Wildlife scoping letter on this plan (April 30, 1998). "It is our opinion that wildlife benefits claimed for many timber sales are vague and/or overstated. We would like to see wildlife benefits more clearly defined (e.g. specifically which species, and what habitat requirements are being improved).

Summit County is also concerned about the designation of approximately 45% of Forest Service lands in Summit County outside the Wilderness as Category 5 prescriptions, especially given CDOW's concern that these prescriptions do not adequately replace past wildlife prescriptions. Natural processes are preferable to aggressive management in interior areas away from human settlements to sustain the long-term ecological health of the landscape. Summit County supports CDOW's preference for category 3 prescriptions as these do not contribute to Allowable Sale Quantity and timber harvest in these prescriptions may require explicit demonstration of wildlife value.

2.2 The Summit County Board of County Commissioners and the community consider it critical that Forest Service timber harvest goals reflect the fact that recreation, not timber, provides the basis of the Summit County economy. The community expressed a strong desire to pursue policies that maximize opportunities for recreation where this is consistent with the goals of protecting wildlife habitat. Expected economic benefits of timber harvest are minimal as no mills are located in or near the County and few local jobs will be created by harvest activities.

Summit County is concerned about the volume of harvest proposed under Alternative D. When our staff questioned the amount of harvesting identified in Table 3-7 of the EIS, the Forest Service planning team forwarded us the two "corrected tables" presented below. Although inconsistencies remain between these two tables, these tables indicate that over 45% of the timber harvest volume and approximately 35% of the acreage to be harvested in the entire White River National Forest under Alternative D will occur in the Blue River Basin. The boundaries of the Blue River Basin are roughly equivalent to Summit County and the Dillon Ranger District. This level of timber harvest is implausible, given the fact that this basin represents approximately 14% of the Forest and has some of most dense recreation use in the nation.

Sawtimber Harvest in MBF per Year (Decade 1 Average Experienced Budget)

Analysis Area	B	C	D	E	F	I
Blue River	740	710	4,697	490	1,840	0
Eagle River	7,430	1,870	940	450	6,260	960
Roaring Fork River	770	840	1,710	470	5,000	180
Colorado Headwaters	210	200	230	230	1,100	930
Lower Colorado River	1,900	0	730	1,870	4,540	3,200
White River	1,580	1,180	1,230	1,140	1,840	670
TOTAL	12,300	4,800	9,500	4,700	18,600	5,900

Table 3-7
Harvest acres in the first decade by analysis areas

	ALTERNATIVE					
Analysis area	B	C	D	E	F	I
Blue River	1,013	267	2,402	185	1,433	0
Eagle River	5,589	643	685	170	4,772	521
Roaring Fork River	1,109	667	1,548	1,048	1,793	400
Colorado Headwaters	961	0	649	717	3,262	1,388
Lower Colorado River	1,128	700	1,735	282	1,698	238
White River	127	205	162	204	2,207	702
Total	9,937	2,712	7,269	2,607	15,176	3,249

The timber suitability map also indicates that the areas designated for potential vegetation management are concentrated along the "interface" with private lands. These areas are among the most highly used by recreationists. These lodgepole pine forests have been identified as providing important wildlife movement corridors and buffers between the developed areas of the County. Summit County understands that historic logging has left many areas of the forest as homogenous and unproductive stands and that some treatment may be necessary to reduce the threat of wildfire. However, we feel that the timber harvest goals in the revised Table 3-7 for alternatives C and E are more consistent with existing land uses and County Master Plans.

2.3 Due to historic mining and logging, Summit County currently has a high density of backcountry roads, a number of which this Forest Plan identifies for closure. Creation of new roads for timber management is inconsistent with the objectives given for closure of existing roads. The Draft EIS identifies roads as the principle "agent of change" causing fragmentation of wildlife habitat with potential to dramatically affect many species. In addition, roads often result in degradation of water quality and aquatic habitat. "Temporary roads" will continue to have high levels of motorized and non-motorized recreational use in Summit County. Obliteration of temporary roads is generally ineffective and costly in the topography of Summit County, leaving long-term degradation of terrestrial and aquatic habitats that the Forest Service cannot adequately address due to lack of funds.

2.4 At least 90 % of the National Forest in Summit County outside the Wilderness is in prescriptions that allow for vegetation management under all alternatives and almost 40% is in wildlife prescriptions that contribute to allowable timber sale quantities (ASQ) under Alternative D. Plan Objective 2.4a states, "By the end of the plan period, offer for sale the allowable timber sale quantity." Given the widely fluctuating and inconsistent timber harvest goals outlined between the various alternatives (outlined above) and this objective, the County is concerned that this Forest Plan could facilitate large scale harvesting of timber in areas defined for wildlife habitat. For example, within the Forest Carnivore prescription, lodgepole pine and aspen vegetation are included in the suitable timber land

base and contribute to the ASQ. However, a panel of scientists in Forest Service Region 1 has specifically doubted the practice of cutting lodgepole pine to improve forest carnivore habitat. The community has expressed concern that these prescriptions and the theme of Alternative D could be utilized to justify substantial increases in commercial harvesting in the White River National Forest.

2.5 Summit County is concerned that clearcuts will have substantial impact on the visual quality of forested hillslopes. The Summit County Comprehensive Plan specifically states that visually sensitive lands (especially prominent hillsides, meadows, ridges, and view corridors) should be preserved. Aggressive forest management may also impact opportunities for solitude and outdoor recreation, Master Plan objectives upon which Summit County's economy is highly dependent.

2.6 There is substantial research to indicate that increasing forest harvest will result in increased phosphorus and sediment loading to the Lake Dillon Watershed. This is a significant issue because this community has spent millions of dollars on advanced treatment to control phosphorus in Lake Dillon. There are also State Standards for phosphorus in this reservoir. If timber harvesting increases ambient phosphorus levels, economic growth in the community could be constrained by these actions of the Federal Government, which are outside local control.

Recent studies by the Summit Water Quality Committee have indicated that suspended fine particulates are contributing a greater portion of the loss of clarity in Dillon Reservoir over time. Summit County has undertaken an aggressive campaign to insure that Best Management Practices (BMPs) are utilized in all earth disturbing activities on private lands. Vegetation management on public lands could contribute to the sediment loading in surface waters, as many forest harvest BMPs do not provide sufficient settling time for fine particulates. The Draft EIS does not address the concern of increased sediment loading from timber harvest activities. This issue is avoided through the statement " major increases in erosion from harvest areas themselves are unusual..." Although this statement may be true in the long run, short and intermediate-term impacts to water quality from clearcuts are well documented, especially in mountainous environments.

The County has established a setback of 25 feet from wetlands and streams for earth disturbing activities. This is considered the minimum necessary to protect aquatic resources. The White River Forest Leadership team has acknowledged substantial degradation of wetlands and aquatic habitat due to the two recent timber harvests in the Upper Blue River Basin. The County advocates that this Plan set policies requiring strict adherence to both Forest Service and County standards for wetlands and water quality for all vegetation management in Summit County. Furthermore, the County urges that strict monitoring of these activities be undertaken by the Forest Service in Summit County to insure no degradation of water quality or aquatic resources results due to vegetation management. The County is willing offer its assistance in implementing a monitoring program where possible.

Roadless Areas

3.1 Roadless areas represent some of the few remaining undisturbed areas in Summit County outside wilderness areas. Because of the lack of roads, these areas can provide unique opportunities for wildlife and for recreationists seeking solitude. These areas are also important because of the undisturbed visual landscapes that they provide. Many of the inventoried roadless areas are highly visible from major roadways. An example is the west side of the Ten Mile Range as observed from Hwy 91, I-70, and Copper Mountain. Summit County feels that these resources should be protected. Timber harvest or developed recreation sites are not appropriate in these areas because of the changes that would occur to the areas' character. We are also concerned that the roadless character of these areas be maintained so that they could be considered for wilderness designation at some future date, if

deemed appropriate. Allowing roads in these areas would preclude their eligibility for such designation. As such, the roadless character of inventoried roadless must be maintained.

3.2 The County would like to note that regardless of management prescription, wilderness areas can only be designated by an act of Congress. Any Recommended Wilderness designation may only apply for the life of the Forest Plan. Notwithstanding these points, we feel that four inventoried roadless areas are worthy of the Recommended Wilderness management prescription and subsequent consideration for designation as a wilderness area by Congress.

The inventoried Ute Pass and Acorn Creek areas are worthy of the Recommended Wilderness prescription because of the habitat areas that they provide, some areas of lower elevation vegetation (uncommon in Colorado wildernesses), and their immediate proximity to the Ptarmigan Peak Wilderness Area. These areas would make logical additions to the existing wilderness.

3.3 The inventoried Black Lake East and West parcels are worthy of the Recommended Wilderness prescription because of several reasons, including: quality habitat provided, lower elevation vegetation provided compared to most Colorado wilderness, and because of immediate proximity to the Eagles Nest Wilderness Area. These areas would make logical additions to the existing wilderness. However, we are concerned that any wilderness prescription for the Black Lakes East and West areas could potentially have the effect of choking off private access to Black Lake, an existing inholding. Therefore, management prescription boundaries must be drawn to clearly be set back from the existing roadway and easement so that the private landowner may retain their ability for access without further restrictions being placed on them by the Forest Service.

3.4 Most of the Summit County portion of the Vail Pass area is identified as roadless according to digital maps provided to us from the Forest Service. Although we agree with maintaining this roadless prescription, we would like to see that the existing management plan developed by the Vail Pass Task Force be honored. This plan was developed after many hours of hard work in a collaborative manner. This plan allows for winter motorized use in some areas. Thus a management prescription such as Backcountry Recreation—Non-Motorized with Winter Motorized would be appropriate for the area.

Aerial Transportation Corridors

4.1 For a number of reasons, Summit County does not support the concept of aerial transportation corridors that would connect between ski areas. The visual impacts of these corridors would be significant and out of character with our existing mountain backdrops. For example, a tramway over the west side of the Ten Mile Range would impair the undisturbed landscape that exists there today, a view that is observed from Hwy 91, a designated scenic byway. Other proposed corridors would have similar visual impacts. In addition, there is concern about the impacts of these corridors on wildlife movement. Finally, although the corridors have been described as a means to alleviate traffic congestion and transportation problems, the corridors as proposed do not to any extent appear to address Summit County's main arterials of movement and thus would do little to reduce traffic.

4.2 The possibility of a fixed guideway system connecting the Front Range to Summit County and beyond has been discussed seriously as an alternative to building additional lanes on I-70. The County is interested in pursuing this possibility as traffic on I-70 escalates. If such a system is implemented, it could occur within the life of the proposed Forest Plan. As a result, we would like to see prescriptions or other mechanisms to allow for the guideway without requiring an amendment to the Forest Plan. Based on discussions with the local Dillon Ranger District staff, the most appropriate management prescription for such a fixed guideway would be the 8.32 Designated Utility Corridors—Potential and Existing. Unfortunately, discussions on the exact location of the guideway are too

preliminary to identify with certainty the route that the guideway corridor would take. A likely route would be near Hwy 6 coming from Loveland Pass to Dillon, where it would likely parallel I-70 westward to Vail Pass. The first demonstration project for the fixed guideway has been proposed between Silverthorne and Frisco. However, under Alternative D no 8.32 prescription is found along I-70 on this highway stretch. The maps should include an 8.32 prescription for the entire route as discussed above. There should also be some recognition in the plan that there needs to be flexibility in the exact location of the 8.32 prescription to allow for different alignments of the fixed guideway.

4.3 In the next 10-15 years, it is likely that a number of transportation needs may arise in Summit County to accommodate increased population and visitors. Some of these new projects (i.e., highway realignments) may potentially cross national forest lands. The Forest Plan should discuss how such transportation projects can be addressed so that an amendment to the plan at a later date is unnecessary.

Local Coordination

5.1 The proposed Forest Plan lacks discussion regarding coordination of forest activities with local governments and there is no requirement for consideration of local master plans in national forest decisions. We feel that these two issues must be addressed if the Forest Plan and implementing activities are to gain acceptance from the public. Federal law requires that when developing national forest plans, local governments shall be consulted and consideration must be given to locally adopted plans. Federal law specifically requires that the environmental impact statement for a forest plan include:

1) Consideration of the objectives of other Federal, State, and local governments, and Indians tribes, as expressed in their plans and policies.
2) An assessment of the interrelated impacts of these plans and policies
3) A determination of how each Forest Service plan should deal with the impacts identified: and
4) Where conflicts with Forest Service planning are identified, consideration of alternatives for their resolution. (Code of Federal Regulations, Title 16, Part 219.7)

The Draft Environmental Impact Statement for the Forest Plan does not include the above-required analysis. As an example of how locally developed plans have not been considered, consider the Vail Pass area, where a Forest Service-approved plan was developed. Under Alternative D the entire Vail Pass area in Summit County is designated for Forest Carnivores. The Vail Pass Task Force was formed several years ago to address managing multiple uses of the Vail Pass area, including winter uses such as cross country skiing, snowmobiling, snowshoeing, etc. The Forest Service played a prominent role in these discussions. Although the area may indeed be critical for habitat purposes, the Forest Carnivores designation is potentially in conflict with management plans that were specifically developed for the Vail Pass area after countless hours of community input and public participation. The Forest Carnivores designation may potentially displace some of the existing recreational uses in the area. It is our concern that although we have enjoyed a good working relationship with the local ranger district, decisions made in the Forest Plan will preclude past efforts or hinder future coordination and planning efforts.

Another prime example of where coordination with local government and consistency with local master plans is needed is regarding potential ski area expansions. In the past, off-site impacts of ski area expansions have received little attention and as a result areas such as Breckenridge have been impacted in a number of ways, including major increases in traffic, parking problems, and employee/affordable housing shortages. A continued philosophy of ignoring these off-site impacts will not only place great strains on the County's infrastructure, but will also likely degrade the character of our towns.

5.2 The proposed management prescriptions around urbanized areas such as Frisco and Copper Mountain do not always accurately reflect the interface of uses that occurs in these areas. For that reason, Summit County looked closely at the 7.1 Intermix management prescription as a possible tool to use in some of these urban interface areas. Although some of the particulars of 7.1 are too open-ended in terms of the types of uses permitted (i.e., no limits on motorized use), we nevertheless support the theme of the Intermix prescription and request that the Forest Service investigate the possibility of utilizing the theme in some of these urbanized locations. There may be other prescriptions available on a regional level that could better fit the needs of our urban interface areas.

Water Issues

6.1 On page 1-5 of the Forest Plan the following goal is presented. "Provide instream flows that support the achievement and maintenance in perpetuity of those federal purposes for NFS lands (i.e., safe drinking water and swimming...) that depend on such flows". This goal is accompanied with objective 1.10 which suggests that, "By the end of the plan period acquire instream flow water rights or establish instream flow protection measures in special-uses authorizations which protect 10% of all perennial streams." While the goal presented may be laudable, objective 1.10 is both frightening and illegal. In particular the County is very concerned with the wording regarding special use permit authorizations: "...or establish instream flow protection measures in special-uses authorizations...". This suggested wording is in violation of the land use authorizations provided for in the National Forest Management Act and is also in violation of explicit protections provided for by Congress in the Federal Land Policy Management Act and the McCarran Amendment.

Within the White River National Forest there are 31 reservoirs and more than 200 water diversions with special use permits. These are public and private water-related facilities legally located on National Forest land, many of which are coming up for permit renewal. Objective 1.1.0 puts each of these private property interests at risk of federal taking.

The County strongly objects to the method of achieving the goal of providing sufficient instream flows through extortion in the issuance or renewal of special-use permits which appear to be authorized in the wording of objective 1.1.0. The County encourages the Forest Service to remove the following wording from objective 1.10, "*... or establish instream flow protection measures in special-use authorizations*". The acquisition and protection of instream flows can be effectively and legally secured through existing mechanisms that do not injure existing legal property rights through acquiring interests in water acceptable to the Colorado Water Conservation Board and converting this water to instream flows consistent with authority expressed in Colorado Statutes.

Ski Area Management Prescriptions

7.2 The County has numerous concerns related to ski area expansions and the potential on-site and off-site impacts of such expansions. Key on-site impacts can include changes in visual landscapes, potential impacts to wildlife habitat and movement, impacts to wetlands, potential for erosion, and other water quality concerns. The DEIS for the Forest Plan acknowledges that "Generally, the greater area devoted to ski-based resort development, the greater is the risk to watershed resources" (p. 3-62, DEIS). Increased snowmaking is an example of a potential threat to the quantity and quality of our watershed resources. Similarly, off-site impacts of ski area expansions can be equally as significant. These impacts can include increased traffic, needs for additional parking, increased demands for housing for new employees, new ski area base facilities, increased demands on sewer and water systems, and increased demands on public services (i.e., fire and police protection). These impacts can increase the level of activity in our towns, creating a potentially undesirable environment for both residents and visitors. The small town mountain character of Summit County's' towns is a large part

of our County's appeal to its residents as well as one of the mainstays that drives our local economies. As such, we need to do everything possible to retain this character.

We feel that the Forest Service has not fully exercised its abilities to evaluate and address on-site and off-site impacts related to ski area expansions in the past. It is imperative that the Forest Service take more responsibility for this in future consideration of ski area expansions. Our comments under "Local Coordination" underscore this issue.

In addition, the County will investigate ways that it can become more involved in the permitting of local ski area expansions. The public has clearly indicated that it is no longer acceptable to allow for expansions without addressing the overall effects that such expansions may have on the entire community.

7.3 Several management prescriptions other than the 8.25 prescription, particularly the 8.21 Developed Recreation Complexes prescription, would appear to leave the door open for developed downhill recreation complexes as currently written. Although Forest Service staff has assured us that the 8.25 prescription is the only one that would allow for developed downhill skiing, we feel that the wording in the Forest Plan needs to be tightened to clearly indicate that developed downhill skiing can only occur in the 8.25 prescription. For example, the 8.21 prescription management area description states that "Areas such as ... winter sports sites, Nordic centers, and resorts may be expected" (Forest Plan, p. 3-74). These descriptions need to be amended to clearly eliminate the ability to have downhill skiing facilities. All public discussions on developed downhill skiing have focused on the 8.25 prescription, and thus it would be inappropriate for other prescriptions to allow for the use.

Telecommunications

8.1 In today's high-technology information age, it is critical that Summit County and its residents have the ability to communicate in an effective manner with the rest of the world. We therefore feel that it is imperative that the Forest Service recognize the future needs of telecommunications and understand that some of these needs may have to be served by remote national forest locations (i.e., summits of mountains that serve as prime transmission sites). The Forest Plan lacks detailed discussion on this issue. A number of County residents are now able to avoid daily commutes to the Front Range because of their ability to tele-commute from Summit County. As new telecommunications technology evolves, the Forest Service should have ways of accommodating that technology, provided of course that environmental resources and the overall health of the national forest are protected.

Vacant Grazing Allotments

9.1 The following Vacant allotments were identified north of Silverthorne in Summit County:

17. Black Creek C&H
18. Boulder Creek C&H
19. Maryland Creek C&H
20. MC C&H
16. Acorn Creek C&H
21. Pioneer C&H

These allotments are generally adjacent to private lands that either have current grazing operations or have the potential for grazing activities. As such, the Summit County BOCC supports the retention of these allotments in their vacant status to allow flexibility in the management of grazing activities, depending on site specific considerations.

The Summit County BOCC requests the closure of the following vacant range allotments:

15. Ptarmigan S&G
23. Tenderfoot C&H
25. Argentine S&G
22. Soda Creek C&H
11. Baldy S&G
13. Copper Mountain S&G
27. Searle S&G
12. Buffalo Creek S&G
24. Willow Creek C&H
26. Corral S&G
14. Officers Gulch S&G

Summit County above Dillon Reservoir is subject to ever increasing pressures from both commercial and private recreation. This area is among the most highly utilized recreation areas in the Country with millions of visitors annually. In addition, this area is strewn with hundreds of private inholdings, and development continues to increase human impacts.

These vacant allotments are dominated by Alpine and Sub-alpine environments and many areas are currently degraded by heavy human use. The Colorado Natural Heritage Program has identified many wetland and riparian sites of biodiversity significance, indicating that conservation resources should be directed toward these sites. The Colorado Division of Wildlife lists areas of these allotments as habitat for numerous species of special concern. In addition, botanical surveys by the USFS have identified several plant species listed on the 1998 White River National Forest Proposed Endangered, Threatened, and Sensitive Species List, and over 10 of rare or imperiled species per the Colorado Natural Heritage Program. According to the Dillon Ranger District Botanist, some of these allotments may be among the last refuges for several of these plant species. We are concerned that retaining large portions of the three upper basins of Summit County as vacant allotments that could be used in a situation of perceived emergency, without environmental review, is inconsistent with current land use patterns. Grazing without adequate review could also be inconsistent with Summit County Government's efforts to protect these fragile ecosystems. We request these allotments be closed to future domestic livestock grazing.

Exhibit B

SUMMIT COUNTY TRAILS AND RECREATION AREAS OF FOCUS

The following discusses area-specific concerns that Summit County has identified with trails and recreation issues as presented in the White River National Forest Plan and accompanying Travel Management Plan (Appendix O of the Draft Environmental Impact Statement).

A. Lower Blue Basin

1. Ryan Gulch/Salt Lick Area

The Ryan Gulch/Salt Lick area lies adjacent and south of the Wildernest Subdivision. Thus, the area is used by Wildernest residents and locals for dispersed recreation opportunities. The County maintains non-motorized trail easements and access points into the area. The area is used as an informal gateway to the Eagles Nest Wilderness, accessing the Lily Pad Lake Trail. In addition, the area contains a series of old logging roads and informal social trails that provide short loop opportunities and connections to Town. The area also serves as an important wildlife habitat area as evidenced on the Biological Assessment report of the DEIS and the Wildlife Overlay District produced by the Colorado Division of Wildlife. Hence, the question exists for the Forest Service on how to manage all these important values.

The current Travel Management Plan under Alternative D closes several of the trails in this area in order to protect wildlife and habitat. Staff has raised the issue however, on how to enforce and manage use in an area adjacent to a high-density population. Efforts were conducted prior to release of the DEIS, by local user groups, the CDOW, and the Dillon Ranger District, to formulate a workable trail system for the area. Specifically, solutions were proposed that would reduce illegal mountain bike use of the Wilderness area, create better access and loop opportunities, and protect wildlife through seasonal closures, some trail and road closures, and new trail construction. Specifically, the parties were able to agree on a strategy that worked for all uses. We recommend the Travel Management Plan recognize those efforts for this area.

2. Willowbrook, Eagles Nest, and Ruby Ranch Areas

A number of trails leave the Willowbrook, Eagles Nest, and Ruby Ranch subdivisions and enter the National Forest and National Forest Wilderness. However, no trails in proximity to either subdivision are Forest Service *system* trails. The Travel Management Plan shows several of these trails as closed. Informal access points are difficult to manage, and it seems impractical to formalize each point as a trailhead. With informal access, the Forest Service does not have the opportunity to post regulations or provide education on responsible use of the Forest. The Forest Service has documented that high-density residential growth adjacent to Forest boundaries create increases enforcement problems, resource damage, and a network of trails leading from residences.

The County has recently purchased the stock ponds property, which lies between the Willowbrook subdivision and the Eagles Nest Wilderness. The County would like to work cooperatively with the Forest Service in developing a management plan for the area that addresses urbanization effects in the area. The issue of urbanization on Forest edges is an important issue that has been raised in all the planning basins. Staff recommends the Forest Service develops strategies with local landowners and local governments to address issues that start on private lands and transfer onto the Forest. A combination of trail closures, new trail construction, and access options may be necessary to manage urbanization issues near Willowbrook, Eagles Nest, and Ruby Ranch. Population density is likely to increase in the Lower Blue Basin significantly in the next 15 years. The Forest Plan offers a prescription called the Urban/Wildland Intermix, which addresses

urbanization on Forest edges, and prescribes the agency to work with local governments and private landowners to resolve those issues. Staff has recommended the Forest Service give this prescription greater consideration, or a similar solution that emphasizes intergovernmental cooperation and urban recreation strategies.

B. Upper Blue Basin

1. McCullough Gulch

Alternative D maintains public access for both motorized and non-motorized summer accesses. In addition, the area is closed to winter motorized travel. County staff supports restrictions on winter motorized travel in Lower McCullough Gulch because it promotes consistency with the non motorized prescription given the Upper McCullough Gulch Basin. Lower McCullough Gulch is a gateway to opportunities in Upper McCullough, Quandary, and the Spruce Creek areas, all of which are restricted to non-motorized travel during winter. The County interfaces with Lower McCullough Gulch as manager of owner of the trailhead into this area. Secondly, recent land ownership changes have resulted in closure of the section of McCullough Gulch trail that crosses private land. Staff requests the Forest Service either allow new trail construction on National Forest to maintain public access or secure public access on the road through prescriptive right. Although Alternative D does not preclude new trail construction, it emphasizes maintaining existing trails, rather than building new ones. At issue is whether new trails could be constructed in instances where traditional public access has been cut off by private land issues.

2. The Golden Horseshoe

Currently the area is under study on how best to manage this popular recreation area, which lies between the French and Swan drainages. Summit County, the Forest Service, the Town of Breckenridge, and the Continental Divide Land Trust are all partners in the study. Alternative D shows the majority of roads and trails open to both motorized and non-motorized uses. One goal of the study is to develop recommendations for an individualized travel management plan for the area. Alternative D prescribes high recreational use in the area. In addition, the Forest Service has the ability to tailor the Forest Plan for special areas like the Golden Horseshoe through District Special Orders. Staff recommends that the Forest Plan allow the flexibility to adapt the final Travel Management Plan to the results of the Golden Horseshoe study.

3. Colorado Trail at Horseshoe Gulch Road (Soda Creek)

The portion of Horseshoe Gulch Road connecting Tiger road to the Colorado Trail in Horseshoe Gulch is unanalyzed in the Forest Plan. This may be an oversight, or could mean the road is considered an undesignated route and therefore closed. The remainder of Horseshoe Gulch road is closed to all uses for wildlife purposes. The Colorado Trail is the only system trail in Horseshoe Gulch. The County is currently securing easements and building a bridge with the Fat Tire Society and landowner Kermit Miller to maintain non-motorized public access to the Colorado Trail from Tiger Road. In addition, the County and Summit Historical Society maintain a trailhead at the Dredge Boat for recreation purposes. Closure of Horseshoe Gulch Road to the Colorado Trail would have impacts on public access to the Colorado Trail from Tiger Road and hinder efforts by the County and local citizens to maintain such access. Staff recommends the Forest Plan show the Horseshoe Gulch Road as open to nonmotorized uses from the Swan River to the intersection with the Colorado Trail.

4. Pennsylvania/Indiana Gulch Rd.

Several alternatives show the Pennsylvania Road closed due to excessive erosion and no legal access across private land at the beginning of the road. This road serves as an important connector for both motorized and

non-motorized recreationists to loop trails together in the Boreas Pass and Indiana and Pennsylvania creek areas. The Blue River Trail is partially owned and administered by the County. This trail serves as a connector to opportunities in and around the Pennsylvania and Boreas Pass areas. Without the Pennsylvania Road, several loop opportunities would be lost. Staff recommends that the Forest Plan change the strategy for Pennsylvania Road to remain open in order to retain trail loop opportunities for nonmotorized uses.

C. Snake River Basin

1. Horseshoe Gulch Road and other trails in the Soda Creek Basin

Portions of Horseshoe Gulch Road on the Keystone side are unanalyzed (closed), while portions leading into old Keystone Ranch and Summit Cove are closed to all uses for wildlife reasons. Alternative D does not acknowledge efforts by the community to formalize and improve public access in the Summit Cove area. Considerable planning and expenditure has been conducted in conjunction with the Forest Service in the Whispering Pines Development area to build trailheads and interconnecting trails that would compliment Forest Service trails in that area. Staff recommends the Forest Service reconsider closure of trails that tie into trailheads planned on private land in the Summit Cove area.

D. Ten Mile Basin

1. Summit County Bikepath

Inconsistencies currently exist between uses allowed on the Summit County Bikepath per County resolution, and the underlying Forest Management prescriptions. Staff requests that the prescriptions in the following areas be changed in order to afford greater consistency across jurisdictional boundaries, reduce user confusion and conflicts, and reduce environmental damage.

The three areas permitting motorized use on the Summit County Recreational Pathway are:
a. Ten Mile Canyon from West Main St. Trailhead in Frisco to Copper Mountain
b. Between the gates in Bill's Ranch, accessed to and from 7th street only.
c. Miners Creek Road.

In the Forest Plan, several areas prescribe motorized use in areas where the Bikepath allows only non-motorized use. These areas are:

a. Between the "s" curve of the Bikepath just beyond the County Commons parcel traveling east to the Iron Springs Road. Private land on either side of this segment permits only non-motorized travel: across County owned property to the west, and across Denver Water Board land and School District property to the east. We recommend a consistent underlying non-motorized prescription. Motorized travel could utilize the Iron Springs Road and power line cut to access Miner's' Creek.

b. From the western edge of Bill's Ranch to the West Frisco Exit. Motorized travel is prohibited on this section of pathway per County Resolution. Alternative D places "no restrictions to motorized travel" under the winter travel management plan. This arrangement promotes motorized vehicles to drive in the wetland area on either side of the path, especially near the old ski jump and the start of the Peaks Trail. Staff recommends a non-motorized prescription for this area to promote greater consistency and reduce environmental damage.

c. The recreational corridor between Heaton Bay and the Dillon Dam. Again, the Recreational Pathway in this area prohibits motorized travel per County resolution. Likewise, the areas on either side of the National Forest, the Dillon Dam Pathway to the North, and the Bikepath across Denver Water property to the South, prohibit motorized travel, such that a motorized prescription in this area is inconsistent with

neighboring jurisdictions, except on roads within the campground and the Dam road. Alternative D calls for "no restrictions to motorized travel" for winter. Staff recommends winter travel be restricted to designated routes in this area, which is the same strategy proposed for summer travel under Alternative D.

2. Ten Mile Canyon

Alternative D closes Ten Mile Canyon to winter motorized travel. County resolution permits motorized travel on the Bikepath within Ten Mile Canyon for the purposes of private landowners accessing their private property. However, in recent years the County Open Space program has purchased the majority of private inholdings on the east side of the canyon. The remaining private land could be accessing through permit, while maintaining a non motorized prescription for public use. Motorized use in this area has created a number a safety and user conflict concerns. Further, the County has serious concerns about public safety when winter use is allowed in an area of such significant avalanche hazard. Secondly, Ten Mile Canyon does not currently link motorized users to Vail Pass or Searle Pass; thus, the trail no longer serves as a key connector to other motorized opportunities. Staff supports summer and winter travel management strategies for Ten Mile Canyon proposed in Alternative D.

W12889

EXHIBIT C

PUBLIC COMMENTS RECEIVED ON THE DRAFT FOREST PLAN

The comment letters in this exhibit were submitted by the public during review of the Forest Plan by one of the following bodies:

Ten Mile Planning Commission
Snake River Planning Commission
Upper Blue Planning Commission
Lower Blue Planning Commission
Summit County Open Space Advisory Council
Countywide Planning Commissioner
Board of Summit County Commissioners
Summit County Planning Staff

W12899

To:	Date	First	Last	Addr1	City	Zip	State
	20-Dec-99	Andy	A	Andya@vailresorts.com			
		Thomas	Ackerman		Silverthorne	80498	CO
L	28-Feb-00	Kenneth M	Adams	POB 2022	Breckenridge	80424	CO
		Dru	Adams	P.O. Box 4160	Dillon	80435	CO
		Catherine	Afle				
		Abigail	Albright	P.O. Box 3399	Breckenridge	80424	CO
L	04-Oct-99	Sen. Wayne	Allard	Hart Senate Ofc. Bldg. Ste 513	Washington	20510-0605	DC
		Heide	Anderson	P.O. Box 3141	Breckenridge	80424	CO
P	08-Mar-00	Angela	Andrews	POB 1852	Dillon	80435	CO
		Andrew	Arennson	909 W. Ave. F	Lovington		NM
		E.C.	Ashton	415 Trout Gulch	Aptos	91245	CA
P	08-Mar-00	Liz	Baer	0246 Tennis Ct Rd, #209	Keystone	80435	CO
		Maria	Begby	P.O. Box 5175	Frisco	80443	CO
		Erica	Bamal	General Delivery	Keystone	80435	CO
L	22-Feb-00	Penelope	Banks	POB 628	Frisco	80443	CO
P	08-Mar-00	Brian	Bannen	POB 4144	Dillon	80435	CO
		Cullen	Barker	5355 Montezuma Dr.	Montezuma	80435	CO
P	08-Mar-00	Tynann	Barnsmez	POB 1345	Frisco	80443	CO
P	28-Feb-00	N.	Bartholomew	8 Cailin Place	Queensland		Australia
		Roger	Bath	Gold Camp #C-67	Breckenridge	80424	CO
L	28-Feb-00	Thomas M	Begley	POB 423	Breckenridge	80424	CO
P	20-Dec-99	Craig	Belcher	POB 3633	Dillon	80435	CO
P	20-Dec-99	Paul	Belkiot	3270 S. Ing St.	Denver		CO
P	28-Feb-00	Martin N.	Bell		Worcester	VAR4,ODW	England
P	17-Mar-00	Dan	Belsky	POB 7191	Langhorne	19047	PA
		Brian	Ben	60 Cr	Breckenridge	80424	CO
Email	09-Mar-00	Vera	Bensen	POB 297	Carpenteria	93014	CA
		Jeffrey	Bergeron	Box 2246	Breckenridge	80424	CO
		Jeffrey C.	Berman	PO Box 9025	Aspen	81612	CO
		D.	Best	PO Box 3394	Breckenridge	80424	CO
		Vern	Best III	P.O. Box 8202	Breckenridge	80424	CO
P	08-Mar-00	Ann	Bicknell	POB 4122	Dillon	80435	CO
P	08-Mar-00	Nick	Biddle	POB 3845	Dillon	80435	CO
		John	Bielzynski	751 Bulls	Elma	14089	NY

W12899

			Seth	Bird	P.O. Box 433	Alma	80470 CO
		02-Apr-00	Joel R and Marn V	Bitler	241 Idlewild Drive	Dillon	80435 CO
		23-Feb-00	Dave	Bittner	dave_bittner@compuserve.com		
F		06-Mar-00	Carla M.	Bjordahl	POB 2247	Dillon	80435 CO
P		06-Mar-00	Annie	Black	POB 359	Dillon	80435 CO
			Bonnie	Boex	PO Box 1892	Dillon	80435 CO
			Joshua	Bol	P.O. Box 23815	Silverthorne	80498 CO
L		14-Dec-99	Dennis L	Bosio	14438 W. Bayaud Ave.	Golden	80401 CO
P		28-Feb-00	Kris	Bowline	3903 Morrison Vr.	Norman	73072 OK
P		08-Mar-00	Barbara	Brandt	43 Vail Cr.	Dillon	80435 CO
P		20-Dec-99	Donald	Brandt	245 Tennis Club Rd	Keystone	80435 CO
			Stuss	Braugh			
L	FS	18-Oct-99	Jim & Donna	Braun	0109 Lone Wolf Court	Dillon	80435 CO
P		08-Mar-00	Chad	Breigenzer	POB 2476	Silverthorne	80498 CO
P		20-Dec-99	Kristin C	Briggs	POB 2619	Breckenridge	80424 CO
L		24-Feb-00	Dan	Briley	POB 466	Silverthorne	80435 CO
P		28-Feb-00	Randall C	Brooke	5703 Stokes Lee Center Rd.	Lee Center	13363 NY
P		20-Dec-99	Alex	Brooks	POB 1942	Dillon	80435 CO
			Rick	Brown	P.O. Box 2864	Dillon	80435 CO
L		01-Mar-00	Jon A	Brownson	POB 2065	Breckenridge	80424 CO
P		20-Dec-99	R.J.	Bruedena	0245 Tennis Club	Keystone	80435 CO
P		20-Dec-99	Richard	Bryant	1615 N. Chipmunk Ln.	Silverthorne	80498 CO
P		20-Dec-99	Carolina	Buganni	POB 8954	Keystone	80435 CO
			Nils	Buhl	PO Box 2995	Breckenridge	80424 CO
			Ronald	Bumann	211 Ash St.	Denver	80220 CO
P		08-Mar-00	Todd	Burdick	POB 9188	Keystone	80435 CO
			JD	Burditt	PO Box 8463	Breckenridge	
			Jim	Burke	42 Vincent St.	Lackawanna	NY
P		08-Mar-00	Jenny	Burns	20 Spyglass Ln	Silverthorne	80498 CO
			Rennett	Byrd	P.O. Box 2102	Breckenridge	80424 CO
P		08-Mar-00	Terry	Cadwallader	687 Ryl Coachman Blvd#169	UNKNOWN	
			Kelly	Caggiano	P.O. Bo x 4226	Dillon	80435 CO
Email		06-Mar-00	Jack & Ann	Cahill	13 Muirfield Lane	St Louis	63141 MO
			Bob	Campbell	PO Box 7847	Breckenridge	80424 CO
			Rod	Carter	PO Box 1165	Silverthorne	80498 CO

W12899

			Diane	Casiana	PO Box 5363	Dillon	80435 CO
		08-Mar-00	Peter	Castillo	POB 4863	Dillon	80435 CO
C	W Allard		Oliver	Catlon	PO Box 7399	Breckenridge	80424 CO
			Rick	Cecil	r2@fs.fed.us		
			Jenn	Cederlof	214 Main St.	Frisco	80443 CO
			Frank	Celico	frankcelico@yahoo.com		
			Brianne	Center	P.O. Box 23539	Silverthorne	80498 CO
L		19-Feb-00	Jack H T	Chang	JChang2775@aol.com		
			Chris	Chapman	P.O. Box 8726	Keystone	80435 CO
P		20-Dec-99	Millicent M	Clair	POB 1706	Keystone	80435 CO
			Michael	Clarke	152 Tenderfoot	Dillon	80435 CO
P		08-Mar-00	Eric	Clayman	1107 Penstemon Rd.	Keystone	80435 CO
			R.	Cochran	P.O. Box 5452	Frisco	80443 CO
L		05-Apr-00	Michael	Cockrell	POB 1255	Frisco	80443 CO
P		08-Mar-00	Robert M.	Cook	POB 8805	Keystone	80435 CO
			Robert	Cooper	1002 Old Airport Rd.	Monett	65708 MO
			Michael	Corcel	0296 Razor Dr.	Keystone	80435 CO
P		20-Dec-99	Steven	Cornellier	POB 566	Dillon	80435 CO
			Paul	Cornelsen	1001 Craig Rd., Suite 250	St. Louis	63146 CO
			Margaret	Coutrer	P.O. Box 1012	Silverthorne	80498 CO
P		20-Dec-99	Patrick	Cox	POB 3280	Dillon	80435 CO
			Currie	Craven	PO Box 4504	Frisco	80443 CO
			Currie	Craven	P.O. Box 7101	Breckenridge	80424 CO
P		08-Mar-00	Charles	Crea	POB 3451	Breckenridge	80424 CO
			Joey	Cuoco	PO Box 133	Silverthorne	
			Bridget	Dake	P.O. Box 3303	Breckenridge	80424 CO
			P.J.	D'Amico	1400 Monroe St.	Denver	80206 CO
P		08-Mar-00	Rosanna	Damiovac	POB 21881	UNKNOWN	
			Mike	Daniel	PO Box 7399	Breckenridge	80424 CO
L		06-Mar-00	Michael E	Davenport	205 Clover Lane	Keystone	80435 CO
P		06-Mar-00	Nicky	DeFord	POB 4057	Vail	81658 CO
			Jodi	Desharnais	604 Kings Crown Rd.	Breckenridge	80424 CO
			Mark	Detsky	P.O. Box 2516	Breckenridge	80424 CO
			Julie	Develle	P.O. Box 3128	Breckenridge	80424 CO
P		08-Mar-00	Scott	Donovan	905 Idlewild Dr.	Dillon	80435 CO

			Nic	Drago		Breckenridge	80424	CO
			Kristen	Dunn	P.O. Box 3831	Breckenridge	80424	CO
		08-Mar-00	Liz	Duxbury	POB 1800	Dillon	80435	CO
			Jim	Earl	Box 3854			
P		28-Feb-00	Bob	Edwards	603 Ascot Dr.	Euless	76040	FL
			Katherine	Edwards	PO Box 5781	Dillon	80435	CO
			Katy	Edwards	Box 8134	Breckenridge	80424	CO
			Todd	Ehlsozer		Denver		CO
			Rick	Eisenberg	P.O. Box 8226	Breckenridge	80424	CO
P		20-Dec-99	Winston	Elliot	0245 Tennis Club Rd	Keystone	80435	CO
P		20-Dec-99	Taylor	Ellis	POB 1852	Dillon	80435	CO
P		08-Mar-00	Eddie	Eloy	POB 4464	Dillon	80435	CO
P		28-Feb-00	Tammy	Enoch	4112 Amarillo Dr.	Harrisburg	28075	NC
P		20-Dec-99	Keri L	Fent	POB 2046	Frisco	80443	CO
P		03-Mar-00	Bill	Fest	9 Sand Cherry	Littleton	80127	CO
P		20-Dec-99	Dale	Fields	316 Summit Dr.	Dillon	80435	CO
L	SRPD	17-Dec-99	Dale K	Fields	POB 2489	Dillon	80435	CO
			AJ	Flemming	PO Box 524	Frisco	80443	CO
			Tom	Floyd	P.O. Box 1844	Silverthorne	80498	CO
			Ben	Ford	P.O. Box 1147	Breckenridge	80424	CO
C	FS	14-Mar-00	Wayne E	Foster	8259 Parkridge Lane	Greendale	53129	WI
				Friends of the Ea	PO Box 4504	Frisco	80443	CO
				Friends of the Lower Blue River				
			F.P.	Fritz	Box 1537	Breckenridge	80424	CO
L		22-Feb-00	Lawrence R	Furrer	irf@postnet.com			
L	FS	25-Oct-99	Mark	Gage	50 Redtail Ct.	Dillon	80435	CO
P		03-Mar-00	ILLEGIBLE	Garibaldi	1322 Victoria	Buenos Aires	1644	Argentina
			Maryann	Gary	P.O. Box 718	Silverthorne	80498	CO
			Maryann	Gaug	PO Box 718	Silverthorne	80498	CO
L		20-Dec-99	Maryann E	Gaug	POB 718	Silverthorne	80498	CO
			Jim	Gerber		St. Anthony		Idaho
P		08-Mar-00	Robyn D.	Glady	246 Sunlight Dr.	Dillon	80435	CO
			Jules	Goere	P.O. Box 5382	Dillon	80435	CO
			Laura	Goodwin	602 Ryan Gulch	Silverthorne	80498	CO
C	FS	29-Feb-00	Miles Z	Gordon	2780 Skypark Dr, Ste 300	Torrance	990505	CA

			Brian	Graland	220 Galena ST.	Frisco	80443	CO
		12-Mar-00	Doug	Greer	5781 Wielert Avenue	Cincinnati	45239	OH
P		03-Mar-00	Craig	Griesemer	1B Tennis Court Rd	Keystone	80435	CO
			Jake	Grosch	PO Box 5683	Dillon	80435	CO
P		20-Dec-99	M	Gross	844 Summit Dr.	Dillon	80435	CO
			Robert	Gumm	French Creek #135	Breckenridge	80424	CO
			W.L.	Halleman	P.O. Box 1412	Dillon	80435	CO
P		20-Dec-99	Brad	Hamilton	1093 Wildflower	UNKNOWN		
			Deboarah	Hammar	P.O. Box 147	Frisco	80443	CO
P		08-Mar-00	Duane	Handy	POB 2544	Silverthorne	80498	CO
			Sheila	Hanley	4951 CR#2	Breckenridge	80424	CO
P		08-Mar-00	Don	Hansen	POB 8700	Keystone	80435	CO
			Chris	Hardins	PO Box 2965	Dillon	80435	CO
			Grady	Harper	174 Edlun Rd.	Grand Junction	81503	CO
P		03-Mar-00	Joan & Robert	Harris	2 S. 501 Cree Ct.	Wheaton	63940	IL
			Chris	Harris	P.O. Box 2862	Silverthorne	80498	CO
L		02-Mar-00	Tory	Hauser	POB 2245	Frisco	80443	CO
C	CommDev	08-Jan-00	Spenser W	Havlick	Campus Box 314	Boulder	80309	CO
P		20-Dec-99	Todd D	Hawks	POB 2619	Dillon	80435	CO
Email		01-Mar-00	Joyce	Hayhow	3500 W. 129 St.	Leawood	66209	KS
P		03-Mar-00	David W.	Hebelon	1B Tennis Court Ln, #142	Keystone	80435	CO
P		08-Mar-00	Jackie	Hegarty	POB 404	Silverthorne	80498	CO
P		08-Mar-00	Chris	Heidebrendt	POB 1987	Dillon	80435	CO
P		20-Dec-99	Peggy	Helms	496-4550	UNKNOWN		
P		28-Feb-00	Josh	Henderson	116 Meadowlark Court	Durant	74701	OK
P		28-Feb-00	Chad	Henderson	6985 Ravine Dr.			
			Kira	Henderson	PO Box 1609	Frisco	80443	CO
P		08-Mar-00	Sharyl	Hendrickson	0366 CR 1450	Silverthorne	80498	CO
			James T	Hendrickson	0366 CR 1450	Silverthorne	80498	CO
			Sharyl	Hendrickson	0366 CR 1450	Silverthorne	80498	CO
			Jimmy	Herbert	PO Box 4826	Breckenridge	80424	CO
			Beata	Herich	P.O. Box 1197	Dillon	80435	CO
			Susie	Hessel	susie@peakproperty.com			
			Jeff	Hewspink	6118 Crest Rd.	Jackson	49203	mi
			Joseph	Hey	PO Box 4221	Dillon	80435	CO

		David	Hoff	P.O. Box 683	Breckenridge	80424	CO
		Diane	Hoffar	P.O. Box 3055	Breckenridge	80424	CO
		Steve	Hoffman	PO Box 2789	Dillon	80435	CO
P	20-Dec-00	Mack	Holland	POB 327	Dillon	80435	CO
		Tommy	Holley	P.O. Box 10,000	Silverthorne	80498	CO
		Ashley	Honeyman	1257 Blue River Apts	Silverthorne	80498	CO
		H.	Hoops				
P	08-Mar-00	Nick	Hooyman	POB 9084	Dillon	80435	CO
		Travis	Hornby	P.O. Box 1150	Dillon	80435	CO
P	20-Dec-99	Robin	Hotle	POB 1485	Silverthorne	80498	CO
		Maurizio	Howard	3700 E. Jewell Ave.	Denver	80210	CO
P	28-Feb-00	Doug	Hutton	2004 Mulberry Hill Ln	St Louis	63017	MO
P	20-Dec-99	Steven	Hurwitz	173 Soda Creek Ct.	Dillon	80435	CO
		Julie	Huyler	P.O. Box 1233	Frisco	80443	CO
L	25-Feb-00	Douglas	Iliff	Douglasiliff@fs.fed.us			
		Frank	Isenhart	Two Pond Rd.	Englewood	80110	CO
L	29-Feb-00	Sincerely Mot	ivated Citizen		Phoenix		AZ
P	20-Dec-99	Paul R	James	0245 Tennis Club Dr., #229	Keystone	80435	CO
		Janina	Janes	P.O. Box 191	Breckenridge	80424	CO
P	08-Mar-00	Susan	Joergensrier	POB 8657	Keystone	80435	CO
L	22-Mar-00	Summit Fat Tire Society	John Donovan	POB 68	Breckenridge	80424	CO
		Todd	Johnson	PO Box 6008	Breckenridge	80424	CO
		Dan	Johnson	5534 Montezuma Rd.	Dillon	80435	CO
		Laura	Johnson	5534 Montezuma Rd.	Dillon	80435	CO
P	08-Mar-00	Carol	Jones	235 Meadow Wood Circle	Dillon	80435	CO
		Heidi	Jones	PO Box 4422	Frisco	80443	CO
		Kathy	Jones	P.O. Box 23096	Silverthorne	80498	CO
P	08-Mar-00	Joseph	Joyce-McMahon	POB 924	Georgetown	80452	CO
		Doug	Kaczka	27 Lake St.			
		Mike	Kearney	PO Box 5781	Dillon	80435	CO
P	20-Dec-99	Steve	Keiser	POB 2043	Dillon	80435	CO
P	20-Dec-99	John	Kelly	245 Tennis Club Rd, #244	Dillon	80435	CO
P	08-Mar-00	Amy	Kemp	POB 7399	Breckenridge	80424	CO
		Reiko	Kemp	P.O. Box 5785	Breckenridge	80424	CO
P	20-Dec-99	Mary Grace	Kennedy	0053 Wagner Way	Dillon	80435	CO

W12899

		Nancy	Kennerly	P.O. Box 2243	Breckenridge	80424	CO
		Dana	Kimrey	PO Box 1216	Frisco	80443	CO
P	08-Mar-00	Mary Ann	King	POB 2396	Silverthorne	80498	CO
		Sue	Knickrehm	P.O. Box 3968	Breckenridge	80424	CO
		Jessica	Knowles	121 Main St.	Frisco	80443	CO
		Nick	Knowlton	PO Box 1033	Silverthorne		
		Craig	Kobe	PO Box 18	Denver		CO
		Roger	Koehler	P.O. Box 1638	Breckenridge	80424	CO
		Tim	Koeneman	P.O. Box 6072	Breckenridge	80424	CO
		Ronald	Konicke	P.O. Box 6201	Dillon	80435	CO
		Jenny	Kreider	Box 1254	Silverthorne	80498	CO
		Jonathan	Kriegel	P.O. Box 2342	Silverthorne	80498	CO
	29-Feb-00	Elizabeth	Krisor	elizabethkrisor@ix.netcom.com			
		Erik	Kuffner	P.O. Box 3608	Breckenridge	80424	CO
P	03-Mar-00	ILLEGIBLE	Kurbeck	344 Bryn Wyck	St Louis		MO
		Peter	Laave	Dillon Valley			
P	08-Mar-00	Kelly	Ladyga	POB 3688	Avon	81620	CO
Email	07-Mar-00	Paul	Lambdin	Plambdin@dresdner.com			
		Sheri	Lan	P.O. Box 3017	Silverthorne	80498	CO
		Michael	Lang	PO Box 2073	Dillon	80435	CO
		Ray	Langenecht	1020 Mesa DR.	Silverthorne	80498	CO
		Glen	Langham	P.O. Box 6372	Dillon	80435	CO
		Lance	Laugesen	121 Flintstone	Breckenridge	80424	CO
		Troy	Leazer	Box 5314	Frisco	80443	CO
L	28-Feb-00	Robert	Lee	robertlee@pol.net			
		David	Lee	1539 S. Hillrose Lane	Superior		CO
P	08-Mar-00	David	Legleia	POB 8504	Keystone	80435	CO
		Laura	Lehl	P.O. Box 8502	Breckenridge	80424	CO
		Mike	Lehr	P.O. Box 4534	Frisco	80443	CO
		Pete	Leonard	4951 CR#2	Breckenridge	80424	CO
		Jim	Liam	P.O. Box 1923	Dillon	80435	CO
		Stacy	Lindholm	P.O. Box 2458	Breckenridge	80424	CO
		Mark	Liscar	509 Teller	Frisco	80443	CO
P	08-Mar-00	Rich	Little	POB 4352	Frisco	80443	CO
P	08-Mar-00	Chris	Lockwood	POB 4404	Dillon	80435	CO

		08-Mar-00	Michelle	Loewenstein	POB 9239	Keystone	80435	CO
		01-Mar-00	Tom	Long	tlong@colorado.net			
			John B.	Lotz	P.O. Box 1741	Breckenridge	80424	CO
P		08-Mar-00	Mike	Love	POB 2073	Dillon	80435	CO
P		20-Dec-00	Chris	Love	POB 3398	Dillon	80435	CO
P		20-Dec-99	Charles	Lucein	POB 2720	Dillon	80435	CO
			Mike	Lundy	P.O. Box 215	Silverthorne	80498	CO
			Martha	Lunsky	P.O. Box 1754	Frisco	80443	CO
L		02-Feb-00	Tim	Lydon	POB 8543	Breckenridge	80424	CO
			Laura	Lyman	P.O. Box 5465	Frisco	80443	CO
P		08-Mar-00	Kelly	Machutas	POB 3357	UNKNOWN		
P		08-Mar-00	Tony	Macri	POB 80498	Silverthorne	80498	CO
C	FS	28-Feb-00	Donna	Magadov	MonVest Realty, Inc. FAX (954)964-2843			
			Mike	Magerowski	PO Box 778	Dillon	80435	CO
			Charles	Maguire	425 Walnut St.	Cincinnati	45202	OH
			Stacy	Malkan	P.O. Box 4223	Breckenridge	80424	CO
L		23-Feb-00	Kevin	Mallory	kevinm@gateinindustries.com			
			Patrick	Malloy	P.O. Box 1563	Frisco	80443	CO
P		20-Dec-99	Ted	Maloch	245 Tennis Club Rd, #231	Keystone	80435	CO
			Isaiah	Manahan	P.O. Box 9114	Keystone	80435	CO
P		08-Mar-00	Michael	Mantion	POB 9181	Keystone	80435	CO
			Robb	Margison	P.O. Box 86	Breckenridge	80424	CO
P		20-Dec-99	Gail	Marion	POB 8938	Dillon	80435	CO
P		28-Feb-00	R.L.	Markle	30700 Ramblewood	Farmington Hills	48331	MI
P		20-Dec-99	John	Martin	POB 8890	Keystone	80435	CO
			Yolanda	Martinez	304 E. 8th St.	Leadville	80461	CO
P		08-Mar-00	Leslie A.	Masserio	POB 5482	Dillon	80435	CO
P		08-Mar-00	Karen & Mark	Mathis	33205 Hwy 9	Silverthorne	80498	CO
			Heide	Matthews	P.O. Box 4065	Frisco	80443	CO
P		08-Mar-00	Robert	Matzke	POB 9053	Keystone	80435	CO
			Joe	McCafferty	PO Box 543	Dillon	80435	CO
			Justin	McCarthy	P.O. Box 23309	Silverthorne	80498	CO
			Jen	McCoy		Silverthorne	80498	CO
			Julie	McGarvey	ecojewel@yahoo.com			
			Julie	McGarvey	9400 Elm Ct. #586	Denver	80260	CO

			Miriam	McGregor	P.O. Box 3539	Copper Mountain	80443	CO
	S	29-Feb-00	Robert	McHugh	8530 Hwy 73	Evergreen	80439	CO
L		29-Oct-99	Rep Scott	McInnis	215 Cannon Bldg.	Washington	20515-0603	DC
P		20-Dec-99	M	McMahon	POB 8923	Keystone	80435	CO
			Erin	McManus	P.O. Box 5381	Dillon	80435	CO
P		08-Mar-00	Amanda D.	McNally	POB 5202	Breckenridge	80424	CO
P		03-Mar-00	Susan & Mitch	Merill	1411 Walnut Ave	Hanover Park	60103	IL
			Charles	Merritt	P.O. Box 3331	Breckenridge	80424	CO
			Nina	Michel	PO Box 882	Dillon	80435	CO
			Corry	Mihm	PO Box 1909	Breckenridge	80424	CO
			Jennifer	Miles	PO Box 8537	Breckenridge	80424	CO
P		08-Mar-00	Steve	Miller	POB 8606	Keystone	80435	CO
P		28-Feb-00	Shawn	Miller	2020 W. Main	Durant	74701	OK
P		20-Dec-99	Ron	Miller	26 Snowberry Way	Dillon	80435	CO
			Ret	Miller	P.O. Box 875	Breckenridge	80424	CO
P		20-Dec-99	Jerry	Minor	7825 Windfort	Parker	80134	CO
			Susan	Mirus	P.O. Box 2477	Silverthorne	80498	CO
			Elizabeth	Mishalanie	P.O. Box 4024	Breckenridge	80424	CO
L		14-Mar-00	Boyd	Mitchell	POB 38	Keystone	80435	CO
P		08-Mar-00	Ginny	Mitchell	POB 4873	Frisco	80443	CO
P		03-Mar-00	Brad	Mitchell	016 Sunlight Dr.	Dillon	80435	CO
			Joyce	Moberly	2870 Purgator	C.S.		CO
P		20-Dec-99	Alan	Moore	255 Meadowwood	UNKNOWN		
L		15-Dec-99	Kurt	Morscher	POB 1813	Frisco	80443	CO
			Pete	Morton	7475 Dakin St. #410	Denver	80221	CO
L	FS	18-Oct-99	Tim	Mottram				
			Marilyn	Muessel	Box 801	Frisco	80443	CO
P		17-Mar-00	Nicole	Murasso	ColeyWoley@aol.com			
			Rebecca	Mutcher	P.O. Box 2464	Dillon	80424	CO
			Joell	Nagg	P.O. Box 1741	Breckenridge	80424	CO
P		08-Mar-00	Lisa	Navarro	POB 5742	Frisco	80443	CO
P		08-Mar-00	Elizabeth	Nelson	POB 5635	Dillon	80435	CO
			Shelby	Newley	P.O. Box 4167	Dillon	80435	CO
			Sarah	Nicholas	P.O. Box 3325	Dillon	80435	CO
L		28-Feb-00	Don M	Nilsson	POB 7	Breckenridge	80424	CO

W12899

			Kelly	Nixon	P.O. Box 5708	Breckenridge	80424	CO
			Chad	Noble	P.O. Box 2824	Dillon	80435	CO
r		08-Mar-00	Lisa	Noll	0050 White Cloud Dr.	Breckenridge	80424	CO
P		08-Mar-00	Andy	Oberhill	General Delivery	Keystone	80435	CO
P		08-Mar-00	Julia	Ogden	POB 3005	Breckenridge	80424	CO
P		08-Mar-00	Janet	Olin	POB 3757	Dillon	80435	CO
P		08-Mar-00	Angela	Osborne	POB 52	Frisco	80443	CO
			Chad	Ottersman	P.O. Box 8511	Breckenridge	80424	CO
			Eve	Owens	PO Box 1394	Frisco	80443	CO
			Bryan	Page	Box 7422	Breckenridge	80424	CO
P		08-Mar-00	Tim	Patterson	221 Idlewild Dr.	Dillon	80435	CO
			Michael	Paul	304 Country Club Dr.	Wilmington	19803	DE
P		28-Feb-00	Darren	Payne	drsuz@iname.com			
			Thomas	Pearson	P.O. Box 1520	Frisco	80443	CO
L		26-Oct-99	William Perry	Pendley/MSLF	707 17th St. #3030	Denver	80202-3408	CO
P		20-Dec-99	Jeff	Penette	Jpennette@vailresorts.com			
			Eric	Pennell	PO Box 1089	Frisco	80443	CO
			Matt	Perez	P.O. Box 4541	Breckenridge	80424	CO
			Natalie	Peroneira	Box 3634	Breckenridge	80424	CO
		27-Mar-00	The Wilderness Society	Pete Morton	7475 Dakin St. #410	Denver	80221	CO
P		20-Dec-99	Andrea	Peters	POB 2098	Dillon	80435	CO
C	FS	06-Jan-00	Kimberly	Peterson	POB 2697	Frisco	80443	CO
P		08-Mar-00	Melanie	Petronio	227 Climax Dr.	Dillon	80435	CO
P		20-Dec-99	Cody	Pickard	245 Tennis Club Rd	Keystone	80435	CO
P		08-Mar-00	Mark & Jennifer	Pierson	148 CR 1018 BRR	Silverthorne	80498	CO
P		08-Mar-00	Larry	Pinner	LarryP@VailResorts.com			
			Carol	Poklick	P.O. Box 187	Silverthorne	80498	CO
L		01-Mar-00	Edward D & Barbara J	Pope	242 West Concord Lane, Old Town	Chicago	60614	IL
L		06-Mar-00	Jeffrey C.	Popp	9140 W Dodge Rd, Ste 408	Omaha	68114-3389	NE
L/CIP			Catherine	Pratt	687 Royal Coachman Blvd, #2	Dillon	80435	CO
C	FS	07-Mar-00	John	Pringle	POB 8935	Keystone	80435	CO
			Nancy	Pugh	P.O. Box 3759	Breckenridge	80424	CO
			Maria	Puigorial	flora119@hotmail.com	Frisco	80443	CO
P		08-Mar-00	Jennifer	Radrug	POB 435	Breckenridge	80424	CO
P		08-Mar-00	Debbie L.	Rahne	POB 8574	Keystone	80435	CO

W12899

			Michael	Ratzan	PO Box 1298	Breckenridge	80424	CO
			Karen	Rausch	PO Box 6181	Dillon	80435	CO
		08-Mar-00	Peter	Reed	POB 10000	Silverthorne	80498	CO
			Jason	Reed		Dillon	80435	CO
P		20-Dec-99	John	Reese	POB 8490	Keystone	80435	CO
			Michael	Regall	PO Box 3843	Dillon	80435	CO
L		08-Dec-99	Ingrid	Reid	POB 5115	Frisco	80443	CO
Email		07-Mar-00	James T	Reilley	2046 Bramblewood Dr. NE	Atlanta	30329-1705	CO
P		20-Dec-99	George	Repine	POB 4501	Dillon	80435	CO
P		06-Mar-00	Patricia	Reyes	POB 4263	UNKNOWN		
P		03-Mar-00	Chris	Rice	Rt1 Box 284B	Fisk		MO
P		08-Mar-00	Reed	Richardson	91 Sauterne Lane	Silverthorne	80498	CO
P		08-Mar-00	Stuart	Richardson	307 Red Hawk Circle	Silverthorne	80498	CO
			Julius	Rico	PO Box 544	Dillon	80435	CO
			Chris	Rimlinger	Box 453	Dillon	80435	CO
P		08-Mar-00	Elizabeth	Robillard	POB 905	Silverthorne	80498	CO
			Elan	Robinson	220 Galena ST.	Frisco	80443	CO
			Stan	Rodgers	P.O. Box 881	Fairplay		CO
			Tim	Rolle	P.O. Box 7206	Breckenridge	80424	CO
FAX		27-Mar-00	Paul E and Judith A	Romano	POB 3727	Dillon	80435	CO
			Robyn	Rosenberg	PO Box 1722	Silverthorne	80498	CO
P		28-Feb-00	Judith	Rosenblum	Premiertrveaol.com			
P		20-Dec-99	Terry & Michele	Rosol	614 Cartier Ct	Dillon	80435	CO
			Craig	Rot	P.O. Box 2366	Breckenridge	80424	CO
C	FS	07-Mar-00	Jack C	Rubenstein	1850 Federated Bld.		45202-	
			Tracie	Rubin	P.O. Box 8554	Breckenridge	80424	CO
P		08-Mar-00	Susan	Rubin- Stewart	431 Marmot Circle	Dillon	80435	CO
			Trish	Ryan	PO Box 2566	Silverthorne	80498	CO
			Cindy	Ryker	P.O. Box 7095	Breckenridge	80424	CO
P		08-Mar-00	Teresa	Salerno	walkes@colorado.net			
P		08-Mar-00	Joanne M.	Salsa	POB 2232	Dillon	80435	CO
			Robert L	Salter	rsalter@prosrm.com			
			Judith	Sandee	P.O. Box 881	Fairplay		CO
			B.	Schaffrauski	4145 Bighorn Rd. #22	Vail	81657	CO
Email		27-Mar-00	Rosemary P	Schardt	Roebreck@aol.com			

		06-Mar-00	Christina	Schleicher	POB 3362	Avon	81620 CO
			Mark & Gerda	Schneider	0277 SCR 675	Breckenridge	80424 CO
		03-Mar-00	Bill	Schultz	10903 War Admiral Dr.	Union	41091 KY
P		28-Feb-00	Tom	Schultz	310 S. Ravine	Chicago	60607 IL
Email		04-Mar-00	Paul	Schutt	Slopeside 2791	Keystone	80435 CO
			Terri	Sebring	P.O. Box 1906	Frisco	80443 CO
P		20-Dec-99	Celia	Sellers	POB 473	Frisco	80443 CO
P		03-Mar-00	William	Senereud	2803 Fraternity Ct.	Crestview Hills	41017 KY
P		28-Feb-00	Clayton	Shaffer	shaffer-clayton@hotmail.com		
P		20-Dec-99	Mike	Shoemaker	POB 3729	Copper Mountain	80443 CO
			Mark & Mara	Siciliano	219 Climax Dr.	Dillon	80439 CO
P		20-Dec-99	Luke	Slattery	362 Idlewild Dr.	UNKNOWN	
C	FS	12-Mar-00	Barry D	Smith	2034 Foxcliff Estates North	Martinsville	46151 IN
			Sheila	Smith	870 S. Garfield St.	Denver	80209 CO
			Megan	Smith	64 Ensign Dr.	Dillon	80435 CO
			Arron	Smith	P.O. Box 2783	Breckenridge	80424 CO
			Brad	Snow	P.O. Box 23939	Silverthorne	80498 CO
			Brian	Sokolom	Box 3774	Breckenridge	80424 CO
P		08-Mar-00	Jay	Sowens	POB 4976	Dillon	80435 CO
P		17-Mar-00	Linda	Spahn	5605 N. 115th Street	Longmont	80501 CO
			W.	Spieckerman	P.O. Box 6309	Breckenridge	80424 CO
			Jeff	Sprouse	P.O. Box 1530	Frisco	80443 CO
			Cody	St. John	PO Box 10,000 #299	Silverthorne	80498 CO
L		08-Jan-00	Erik	Staub & Family	Estaub@aol.com		
			Scott	Stellmach	P.O. Box 5452	Frisco	80443 CO
P		08-Mar-00	Dale	Stevens	POB 101	Silverthorne	80498 CO
			Karn	Stiegelmeier	PO Box 824	Silverthorne	80498 CO
			John	Stipenske	PO Box 7961		
P		03-Mar-00	Larry	Stone	POB 4315	Dillon	80435 CO
			Jim	Stoner	PO Box 23532	Silverthorne	80498 CO
P		20-Dec-99	Carl Clif	Strobel	POB 250	Dillon	80435 CO
			Doreen	Sugin		Keystone	
P		20-Dec-99	Jarrod	Sullivan	0474 Cartier Ct.	Keystone	80435 CO
			Kathleen	Sullivan	PO Box 6363	Breckenridge	80424 CO
			Tom	Surbrook	PO Box 6193	Breckenridge	80424 CO

		08-Mar-00	Sara	Suriani	POB 2212	Dillon	80435 CO
		28-Mar-00	Mark & Gerda	Swearengen	POB 1408	Chester	23831 VA
		26-Feb-00	Joe	Swenson	jswenson@uswest.net		
L		09-Dec-99	Katy	Syko	POB 68	Breckenridge	80424 CO
P		28-Feb-00	Dianne	Taylor	6519 Sadler Rd.	Waxhaw	28173 NC
C	FS	14-Mar-00	Joey and Bill	Terriquez	28 Trappers Crossing Tr., #8758	Keystone	80435 CO
P		20-Dec-99	ILLEGIBLE	Thelander	0245 Tennis Club	Keystone	80435 CO
			Jack	Thomas	7000 S. 31st Place	Lincoln	NB
C	FS	21-Mar-00	Sheila M Smith and	Thomas Holiday	870 South Garfield Street	Denver	80209 CO
			Evans	Thompson	1291 Adams Ave.		
			Cat	Tierney	P.O. Box 640	Dillon	80435 CO
			Chris	Tim	P.O. Box 5832	Breckenridge	80424 CO
C	FS	16-Dec-99	Peg	Toft/NWCOGG	POB 2308	Silverthorne	80498 CO
L		28-Feb-00	Robin	Towle	RobRobT@aol.com		
			Denise	Townsend	Box 3402	Breckenridge	80424 CO
			Chris	Trageger	PO Box 5942	Breckenridge	80424 CO
			Zach	Trimmer	PO Box 543	Silverthorne	80498 CO
			Lori	Truffer	P.O. Box 764	Leadville	80461 CO
P		20-Dec-99	Tanya	Tucci	POB 3442	Dillon	80435 CO
Email		01-Mar-00	Dale	Tucker	Dale.Tucker@qwest.com		
			Ashlin	Tucker	785 Hathaway	Fairplay	80440 CO
			Laurel	Tucker	PO Box 4535	Frisco	80443 CO
			Charles	Tyler	P.O. Box 2247	Breckenridge	80424 CO
			Richard	Upton	4439 Bluffview	Dallas	75209 TX
			Gayle	Vaille	168 Vail Cir	Dillon	80435 CO
Email		24-Mar-00	Stuart and Nelleke	Vander Heide	POB 38	Keystone	80435 CO
			Will	VanOverbebe	91 River Run Rd.	Keystone	80435 CO
			Sarah	Vasburgh	P.O. Box 291	Fairplay	CO
			Curtis	vonTrapp	P.O. Box 7725	Breckenridge	80424 CO
			Michael	Ward	PO Box 4425	Dillon	80435 CO
			Daniel	Warm	P.O. Box 7274	Breckenridge	80424 CO
L		20-Dec-99	John	Warner	POB 73	Breckenridge	80424 CO
P		20-Dec-09	John	Watt	57 Northside Circle	Silverthorne	80498 CO
			Brian	Waymire	P.O. Box 23893	Silverthorne	80498 CO
			Bernard	Wayne	P.O. Box 3192	Breckenridge	80424 CO

W12899

		28-Feb-00	Kent	Weber	POB 211	Silver Cliff	81252
			Alex	Weidt	Gold Camp #C-67	Breckenridge	80424 CO
P		20-Dec-99	Joni	Weinberg	POB 8875	Keystone	80435 CO
C	FS	14-Dec-99	Carol L	Welsh	POB 6133	Dillon	80435 CO
			Susan	Whitcomb	P.O. Box 382	Breckenridge	80424 CO
P		20-Dec-99	K	Whittell	498-4578	UNKNOWN	
			Michael	Widdowson	0125 Tennis Rd.	Keystone	80435 CO
			Jack	Wiens	PO Box 1713	Frisco	80443 CO
P		20-Dec-99	Kurt	Wiesbauer	9063 W. Quarto Ave	Littleton	80127 CO
L		01-Mar-00	Robert L	Wilcoxon, M.D.	102 McIntosh Cir. Dr. Ste102	Joplin	64804-1020 MO
			James	Williamson	P.O. Box 4785	Dillon	80435 CO
Phone		27-Mar-00	Pennington and Linda	Wimbush	POB 4707	Dillon	80435 CO
			Edward D & Barbara J	Wingfield	charminb@co.summit.co.us		
				Winsdlow	301 Cross Creek		
L	FS	10-Mar-00	A Charles	Wise	W140 N7300 Lilly Road	Menomonee Falls	53051-4606 WI
P		08-Mar-00	Paul	Witt	POB 955	Eagle	81631 CO
			Mel	Wolfe	PO Box 886	Loveland	80539 CO
P		08-Mar-00	Andrea	Wolfe	POB 3105	Dillon	80435 CO
			Jeremiah	Worm		Dillon	80435 CO
P		08-Mar-00	Kristin	Yantis	POB 720	Avon	81620 CO
			Michael & Nancy	Yearout	yearin@colorado.net		
P		20-Dec-99	Todd	Young	POB 9085	Keystone	80435 CO
			Andrea	Zeger	113 Linden Ave.	Mercersburg	17236 PA
Email		09-Mar-00	Bernie	Zurbriggen	bernie@inetbeam.net		
			Colorado Snowmobile Association, Inc.		PO Box 886	Loveland	80539 CO
P		20-Dec-99	Kristin		POB 23800	Silverthorne	80498 CO
			ILLEGIBLE		7 West Seventh Street	Cincinnati	2417 OH
P		03-Mar-00	ILLEGIBLE		135 Sunrise		
C	FS	02-Mar-00	Paula &			Keystone	80435 CO
P		28-Feb-00	ILLEGIBLE		Slopeside 2791	Dillon	80435 CO
P		28-Feb-00	Bert M.		POB 5022	Silverthorne	80498 CO
			Occupant		PO Box 2402	Dillon	80435 CO
			Occupant		393 Vail Cir	Silverthorne	80498 CO
			Occupant		19 Timber Wolves Trail	Avon	81620 CO
			Occupant		PO Box 7286		
			Occupant		PO Box 8500	Keystone	80435 CO
			Occupant		616 N. 45th	Seattle	WA
			Occupant		PO Box 873	Dillon	80435 CO
			Evan		1711 General Delivery		
			Occupant		Hobbit Hill		
			Occupant		PO Box 2534	Breckenridge	80424 CO
			Occupant		PO Box 2615	Dillon	80435 CO
			Occupant		P.O. Box 2576	Breckenridge	80424 CO
			Occupant		P.O. Box 1516	Frisco	80443 CO
			Occupant		P.O. Box 3791	Breckenridge	80424 CO
			Occupant		Box 7399	Breckenridge	8042 CO
			Occupant		Box 4837	Breckenridge	80424 CO
			Occupant			Leadville	CO
			Occupant		P.O. Box 23052	Silverthorne	80498 CO
			Occupant		P.O. Box 3308		
			Occupant		8018 Ryan Gulch Rd	Silverthorne	80498 CO
			Occupant		P.O. Box 23797	Silverthorne	80498 CO
			Occupant		P.O. Box 111	Alma	CO
			Occupant		111C Forest Dr.	Frisco	80443 CO
			Occupant		P.O. Box 1644	Frisco	80443 CO
			Occupant			Keystone	