

Appendix 3

Interdisciplinary Team's Response to Comments Received for the Environmental Assessment

Eastern Off-Highway Vehicle Connector Route Project

On September 5, 2012, a legal notice was published in the Ironwood Daily Globe announcing the release of the Environmental Assessment (EA) for the Eastern Off-Highway Vehicle (OHV) Connector Route Project. This EA was sent to 81 interested parties. In addition, this project was listed on the Forest's website to further encourage public participation:

<http://fs.usda.gov/goto/ottawa/projects>.

This document presents the Interdisciplinary (ID) Team's formal response to comments received during the 30-day comment period held for the EA. It is important to acknowledge that this is not a stand-alone document; it must be used in concert with the comment letters received and the references to other documentation outlined in the ID Team's responses, such as the EA, Project File and the Ottawa National Forest's 2006 Land and Resource Management Plan (the Forest Plan).

Comments that were received within the 30-day comment period and are within the scope, authorities and decision space for this project have received a response, as approved by the project's Responsible Official. Therefore, the ID Team's responses have been developed to address those comments that are site-specific in nature to the Eastern OHV Connector Route project and management strategies proposed. Examples of comment letter topics that will not be addressed include, but are not limited to: comments that interject opinion, topics that have been addressed through other means, such as requests for clarifications as previously documented in the project file; comments deemed outside the scope of the project, such as actions on lands outside of the Ottawa's management authority or jurisdiction; and those that take issue with decisions that have already been made (i.e., Forest Plan direction and applicable laws, regulations, or established policies).

Comments are presented in chronological order according to date received by the Ottawa National Forest (Ottawa) as outlined in Table 1. Many comments supported the Proposed Action and do not require a detailed response. We appreciate the input provided. It will be considered by the Responsible Official when he makes his decision. Those comments that provided a question or concern that requires a response have been assigned a number in the table and the detailed responses follow. In the detailed responses, the underlined text indicates the specific portion of the comment that required a response.

Table 1. Summary of Commenters Received

Number	Commenter Name	Date Received	Comment Type	Response to Comments
Supportive Comments - Alternative 2				
-	Marvin Westerdahl	9/6/2012	e-mail	No response.
-	Randy Bloomhuff	9/7/2012	e-mail	No response.
-	Will Snider	9/7/2012	e-mail	No Response.
-	Michele Abel	9/10/2012	e-mail	No Response.
-	Keith and Sharon Meyer	9/10/2012	Phone call	No Response.
-	Jerry and Chrissy Schreiber	9/10/2012	Phone call	No Response.
-	Mary Fischer	9/11/2012	e-mail	No Response.
-	Don Helsel	9/14/2012	e-mail	No Response.
-	Henry Wozniel	9/18/2012	e-mail	No Response.
-	Aaron Nysse	10/2/2012	e-mail	No Response.
-	John Schnorr, Lake States Resource Alliance	10/7/2012	Letter	No Response.
-	John Schnorr, WOHVA	10/7/2012	Letter	No Response.
1	Ron Yesney MIDNR	9/6/2012 9/26/2012	e-mail e-mail with attached letter	Page 4
2	Skip Schulz	9/7/2012	e-mail	Page 5
3	Cathy Wainio	9/15/2012	e-mail	Page 6
4	Ross Kolesar WUPTA	9/7/2012	e-mail	Page 6
Supportive Comments - Alternative 3				
5	Joe Chavis	9/20/2012	e-mail	Page 7
6	Lisa Masnova, Iron County Board of Comm.	9/28/2012	e-mail	Page 7
7	Bob Black, Iron County Chamber	9/28/2012	e-mail	Page 8
Comments that Support the No Action Alternative				
8	Allan Smolinski	10/1/2012	mail	Pages 8 - 37
9	Joe Hovel and Nancy and Al Warren, Northwood Alliance, Inc.	10/3/2012	e-mail and attached letter	Pages 37-50
10	Allan Smolinski	11/1/2012	mail	Pages 50-58

Comment 1 – Ron Yesney, Michigan DNR

I have reviewed the environmental assessment for the Eastern Off-Highway Vehicle Connector Project.

I recommend and prefer alternative two. It is the safest and most reasonable alternative.

I encourage the Ottawa to implement alternative two and then to continue studying alternatives to avoid placing off-highway vehicles on paved roads and high use roads. Paved roads should be the absolute last alternative considered. DNR cannot designate ORV routes on paved surfaces. Designated routes are signed, maintained, and can include law enforcement dollars.

Thanks for your work on this project.

Sincerely.....Ron Yesney

Dear Forest Supervisor:

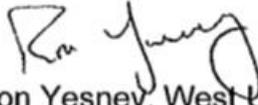
Thanks for developing the Eastern Ottawa Off-Highway Connector Routes Project. We believe this is a good start in an effort to create an interconnected trail system for Off Highway Vehicle's (OHV) in the Western Upper Peninsula.

We've reviewed the proposals and believe that Alternative #2 best serves the public. Beyond this decision, we suggest the following:

- a) The US Forest Service (USFS) continue to partner with the Department of Natural Resources (DNR) on development of OHV connector routes. One area of specific concern is between Baraga Plains and Sidnaw. We realize the Sturgeon River lies between these sites, but we believe it is in the best interest of our recreating public and local communities to find a way for OHV's to legally travel between these two State designated OHV trails.
- b) The USFS start considering more rustic locations for OHV trail development. Narrow 65" trails that wind through the woods between destinations is what OHV riders are seeking. We encourage the USFS to consider working with the user groups and the DNR and moving OHV connector routes off of busy roads and onto little used roads or trails where vehicle traffic is not customary. These types of trails are much preferred by the user groups and are safer because they don't mix OHV traffic with vehicular traffic. In addition, having a quality trail system will be much easier to promote than simply having roads open to OHV traffic.
- c) A change may be needed in the Ottawa's Travel Management Rule map. A complaint that we hear frequently about the Ottawa from the public, and from folks coming here to recreate, is directed at the amount of road mileage open to OHV travel that is made up of short dead-end roads. It is a source of disappointment for the general public because they want more of the OHV riding opportunities to consist of connector routes and trails. When they review the OHV vehicle use maps and realize that many of the roads don't connect, they become agitated.

Thanks again for your efforts in developing these OHV connector routes. We believe that having a designated, maintained, signed, enforced, and interconnected OHV trail system in the Upper Peninsula would benefit our economy, the public, and our natural resources. This project is a step in the right direction.

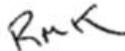
Sincerely,



Ron Yesney, West U.P. Recreation
Management Specialist
Parks & Recreation Division
906-228-6561



Greg Andrews, Resource Economic
Development Analyst
Executive Division
906-228-6561



Rob Katona, U.P. ORV Resource Analyst
Parks & Recreation Division
906-228-6561

Response 1

The Ottawa thanks the Michigan DNR for their support in managing OHV use in the area. The comments provided are outside of the scope of the current project and the Purpose and Need for this project, but we look forward to continuing to manage OHV use on the Ottawa National Forest in cooperation with the State. We will continue to coordinate with them to address the broader concerns raised here.

In order for Alternative 3 to provide a connection between the State of Michigan Multi-Use Trails (and thus meet the Purpose and Need), riders must travel on a paved county road that is already open to OHV travel (Ponozzo Road). It is noted that the DNR could not formally designate this portion of the proposed Routes as a state ORV Route.

Comment 2 – Skip Schulz

As the Founder of Michigan Trails and Recreation Alliance of Land and the Environment, along with the President of the Upper Peninsula ORV Trail Development Association, I have been very active in the Sport of ORV Riding, the development and maintenance of ORV Trails in the Western Upper Peninsula.

I was also a charter member of TRALE-UP in 1991. I was a part of the work and development of the 'P' Trail through the Ottawa National Forest.

I am also on the Ontonagon County Economic Development Corporation Board of Directors, a Board Member of Ontonagon County Search and Rescue.

However I am writing this letter in support of Alternative 2 on my own behalf.

We NEED these ORV Connector Trails to properly manage the INCREASING number of ORV Riders in the Ottawa National Forest.

We NEED these ORV Connector Trails for our DEPRESSED Tourism Economy in the Western UP.

We NEED these ORV Connector Trails as the Upper Peninsula ORV Trail Development Association is working with the Michigan DNR, PURE MICHIGAN, State and Federal Legislators, Local and County Officials, in developing an inter-connecting ORV Trail System in the Upper Peninsula.

I started on working in getting ORV Connector Trails in the Ottawa National Forest in January of 2006. It's been 6 long years that I have worked on this.

Can we PLEASE get the two North-South ORV Connectors in the Ottawa NF opened?

Sincerely,

Skip Schulz

Response 2

The purpose and need for this project is to create a north-south connection on the eastern portion of the Ottawa. This project does not include a proposal to create a north-south connection on the west side of the Ottawa due to land ownership and road jurisdiction issues associated with routes previously evaluated in those areas (as first proposed in the 2009 OHV Connector Routes Project that was reversed on appeal).

Comment 3 – Cathy Wainio

Alternative #2 Selected.

It is very important that support is given to the Connectors for the ORV trail systems. Such enhancements would benefit the economic areas subjected to these trails. It would also greatly benefit the recreational opportunities by offering people a safe trail system that is mapped, managed and maintained. It would offer a designated path for people to follow which encourages activity to remain on trails rather than traveling within the forest. This and other connectors would protect the forest environment.

For myself and many other long standing volunteers that work under the guidance of the USDA National Forest Service, Michigan DNR, local municipalities and private land owners; there is a passion for the needs of people to have an opportunity to experience and enjoy our natural resources. There is a calmness in the wilderness that compares to nothing else. It clears the mind and heals the heart and brings joy.

Appendix 3: Response to Comments
Eastern OHV Connector Route Project

Accomplishing a connective trail between Land O Lakes, Wisconsin and Watersmeet Michigan and also the unused grade that runs from Marenisco to Wakefield would be two of the needed improvements that follow a goal of making Michigan "The Trail State". I would help to make Michigan a State where vacationers will be glad to come visit. I also support including these connective trails on the next published DVUM as open ORV routes.

I am a member of a Multi-Use Trail Group and also a Horse Trail Group. I appreciate all land owners, stewards and the volunteers. I appreciate their continued work that brings good, orderly, well managed recreation for the public to enjoy.

With sincere thanks,
Cathy Wainio

Response 3

The designation of the routes between Land O Lakes, Wisconsin and Watersmeet, Michigan and Marenisco to Wakefield, Michigan is outside the scope of this project. However, it should be noted that these routes will be adjusted on the 2013 Motor Vehicle Use Map (MVUM) as a result of Administrative Corrections (Project File) to show the routes as Forest Service jurisdiction. They will be shown as special designation trails open to all vehicles.

Comment 4 – Ross Kolesar, Western UP Trail Association

The Western U.P. Trail Association located in Ironwood, MI. would like to express their support of the Ottawa National Forest to include the abandoned grade between Wakefield and Marenisco that is on the Ottawa NF to be added as an OPEN ORV Route to the 2013 Designated Vehicle Use Map (DVUM), along with the grade between Land O Lakes (WI) and Watersmeet.

Sincerely
Ross Kolesar
WUPTA President

Response 4

See Response 3.

Comment 5 – Joe Chavis, The Chippewa Sno-Kats Trail Club

My name is Joe Chavis, President of the Chippewa Sno-Kats Trail Club Inc. out of Crystal Falls Michigan. I feel that Alternative #3 would be the best route for the connector trail, due to the fact that it would bring riders closer to Iron River, where they have easy access to gas, food and lodging.

For riders coming from the west, it is a long way up through Sidnaw to Rousseau where there is very little accommodations for them on that route to stop for anything they may need. Coming closer to Iron River they have a choice of coming on into town or continuing on their way north.

All the towns and business's in the U.P. need those tourism dollars. By bypassing Iron River would be a mistake.

Our club established a connector route between Crystal Falls and Amasa, utilizing county roads that were open to OHV use, and it has made a difference this summer.

Response 5

The State Multi-Use trail is open to OHV use from the Michigan communities of Iron River to Marenisco with options for OHV access along the length of the trail including from Iron County Roads which are also open to OHV use and intersect with the trail west of the Iron River community.

The proposal to open Forest Road (FR) 3270 to OHV travel under Alternative 2 would provide an opportunity for an additional access point to the State Multi-Use trail and would not prevent OHV users, coming from the west, from choosing to continue traveling further east on the State-Multi Use trail (past the FR3270 intersection) to the Iron River community and surrounding area where they would be able to partake in the purchase of food, gas, supplies and lodging.

Though it is not the purpose of this proposal, the opening of FR3270 to OHVs under Alternative 2, could provide riders from the Iron River area a loop riding opportunity via the State-Multi Use trail to Iron County 657 to FR3270 and back to the State-Multi-Use Trail for return travel to Iron River and surrounding area.

Comment 6 –Iron County Board of Commissioners, Linda Masnova

Please be advised that the Iron County Board of Commissioners went on record at their bi-monthly regular meeting on Tuesday, September 25, 2012, approving Alternative 3 of the Environmental Assessment for the eastern Off-Highway Vehicle Connector Project. The reason for this choice is FEIS 3-202 – “OHV recreation also contributes to a community’s economic welfare. Vendors receive revenue from the direct sale of food, gas, and supplies to visitors. Additional revenues are generated from visitors lodging and dining at local hotels and restaurants.”

Response 6

See Response 5.

Comment 7 – Iron County Chamber of Commerce, Bob Black

Please be advised that the Iron County Chamber of Commerce is supporting Alternative 3 of the Environmental Assessment for the eastern Off-Highway Vehicle Connector Project. The reason for this choice is FEIS 3-202 – “OHV recreation also contributes to a community’s economic welfare. Vendors receive revenue from the direct sale of food, gas, and supplies to visitors. Additional revenues are generated from visitors lodging and dining at local hotels and restaurants.”

Response 7
See Response 5.

Comment 8 – Allan Smolinski

Comment 8a:
Project Record

The EA, page 15, states, “Road reconstruction (widening) will be prioritized based on highest safety needs. A five year schedule has been prepared to ensure completion, as funding becomes available (see Project Record).”. The EA page 28, states, “Per the forest-wide OHV Monitoring Strategy (see Project Record), ...”. I viewed the project record on September 20, 2012. These were not included in the project record. Neither was the “Engineering report, analysis of #3600” which staff was able to locate, and as a courtesy, a copy was provided. The other two weren’t found. Informed public commentary on the EA, or these two items, is not possible. They would be relevant to comments that follow, for example. I recommend a revised EA be released in place of a DN/FONSI. I believe this is an appeal issue.

Response 8a

The commenter was provided with copies of the requested documents, which had not been filed in the appropriate electronic folders when he viewed the record on September 20. Unfortunately, they did not reach him in time to provide comments on those documents. Therefore, the Responsible Official offered him a chance to provide additional comments on those documents. He provided these additional comments on 11/1/2012 and they are responded to under Comment 10 below.

Comment 8b:
“OHV”

The definition of “OHV” is available in the glossary of the Forest Plan and the FEIS. EA footnote 1, page 1, offers a different definition. Footnote 2, page 8, appears to expand the definition of footnote 1.

Page 12, for 2.4 Design Criteria, transportation, 5), includes off-road motorcycles. Page 19, for 3.4.1 Issue 1, states, “...motorcycles are not classified as an OHV in this analysis,...”. USDA Forest Service, 1975, pertains to “Jeeps” and motorcycles. USDA, Forest Service, 1993 pertains to five motorcycles. Two Michigan State noise emission standards for motorcycles are cited on page 18. ORV tagged motorcycles travel on the State Multi-Use Trails. Disclose clarification as to which parts of this EA contain analysis of motorcycle usage on the proposed connector routes, and which parts do not. Disclose plans to restrict or prohibit motorcycle use, and related monitoring and enforcement methods.

Response 8b

The Forest Service travel management regulations (36 CFR 212.1) define off-highway vehicle (OHV) as “Any motor vehicle designed for or capable of cross country travel on or

immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain.” Unless otherwise specified, this is the definition used throughout this EA for the proposal. OHVs can include, but are not limited to: ATVs (4-wheeled vehicles generally less than 50 inches, UTVs (4-wheeled vehicles generally less than 65 inches, also referred to as side-by-sides), and off-highway motorcycles.

Unless otherwise specified, the discussion of impacts and monitoring related to OHV route designations throughout the EA are inclusive of any kind of motor vehicle defined as an OHV above, including motorcycles.

It should be noted that Forest specialists have observed that off-highway motorcycle use on the Ottawa is very minimal in comparison to the use of typical “ATVs” (4-wheeled OHVs 50 inches or less) and we have documented no evidence of direct impacts caused by motorcycles, thus the analysis is focused primarily on ATVs, since that is the expected type of use.

There are no plans to enforce restrictions on off-highway motorcycles as they are not proposed to be prohibited.

The commenter references the statement on page 19 of the EA “...motorcycles are not classified as an OHV in this analysis,...”. This statement is referring to the reference USDA Forest Service 1975. This statement was included as a summary of the conclusions in that citation and therefore, “this analysis” in this sentence was not referring to the analysis presented in the EA, but instead refers to the analysis of the referenced article. The cited reference includes an evaluation for the detectability of motorcycles; however, the data is less reliable than that for ORVs since only one site had usable motorcycle noise data. Effects from the noise impacts from off highway motorcycles are presented on page 19 of the EA.

[NOTE – the Errata to the EA, published with the Decision Notice and Finding of No Significant Impact, clarifies the definition of OHV provided on page 1 of the EA. In addition, it notes that in Table 1 of the EA, the term “OHV only” refers to routes that are currently open to vehicles 50 inches or less only.]

Comment 8c:

Season

Restricting OHV use on the proposed connector by way of calendar-based seasonal designation was not mentioned. Disclose planned seasonal designation for dual use roads and for intersecting OML 1 and 2 roads and trails, as well as planned efforts to monitor use and enforce out – of – season illegal use rules and regulations.

Response 8c

Neither proposed Alternative would change the season of use designations that are already in place. According to the current MVUM, most routes that are OML 1 and 2 are closed

seasonally to OHV and other motor vehicle use from March 15 to May 15 due to a seasonal restriction. Therefore, open OML 1 and 2 roads that intersect the proposed connector routes are also subject to these seasonal restrictions. Intersecting roads not open to OHVs are closed year round and are not displayed on the MVUM. These restrictions are enforced through law enforcement patrols completed by law enforcement officers (LEOs) and Forest Protection Officers (FPOs). In addition, Forest staff and other Forest visitors may report violations of the seasonal restrictions to law enforcement officers as well. The intersecting routes were signed to indicate designated motor vehicle use in November 2012. These adjacent OML 1 and 2 roads and trails have been and would continue to be monitored according to the Monitoring Plan shown in Chapter 4 of the EA.

At present, the dual use OML 3 and 4 roads proposed as part of the connector routes have seasonal weight restrictions for motor vehicle use. Motor vehicles not affected by seasonal weight restrictions can travel on the proposed roads year-round up until snow cover makes them impassable, due to these routes not being plowed in the winter. Proposed OHV use of the connector routes would be permitted in the same manner as those motor vehicles not restricted by weight, and therefore, OHVs would be permitted to travel the route year-round as long as they were not creating damage to natural resources or violating other Forest regulations.

Furthermore, it should be noted that these routes are currently open to snowmobile traffic during the winter. A few sections of the proposed route near Lake Ste. Kathryn (.5 miles) and the Sidnaw – Bergland grade (< 3 miles) are part of a designated snowmobile trail. Snowmobiles are not allowed if/when roads are plowed for logging activities for safety reasons. When snow-covered, where the proposed routes are packed by snowmobile traffic, some OHVs may travel the routes in the winter.

Comment 8d:

FR3660

My scoping letter reply “6) Disclose rationale for designating 3660.” This was not categorized as either a concern or an issue, and was not included in the “Scoping Comment Matrix” (Project Record). The EA discloses no purpose and need for designating 3660. This segment would appear to be a dead end. It ends approximately at 3668, designated for highway legal vehicle use, and a canoe landing on Lake on Three. This canoe access is a destination for non-motorized users, yet it was not mentioned as such on EA page 20. 3668 continues on the west side of the lake to private property with lake frontage on the south half of the lake. 3668-A, also designated for highway legal vehicle use, intersects 3668 and leads along the east side of the lake to private property with lake frontage on the south half of the lake. Neither 3668 nor 3668-A will be part of the connector, according to the EA. The 3660 segment will end at a line across 3660 at an undisclosed specific location. Disclose the purpose and need to provide an OHV connector that dead ends at an undesignated access road for a non-motorized user destination.

Approximately .7 mile south of the 3660/3500 intersection is the intersection of 3500 with 3557. 3557 is designated open to all motor vehicles, and ends at a “turn-around” clearing, with a path of about 150 feet to a scenic view of Glitter Lake, a view of the Ottawa with human structures

absent. Disclose the purpose and need to create a segment of OHV connector that ends with only the road surface serving as a turn-around, several hundred feet from a canoe landing that provides a view of several structures. Disclose the planned timeframe for the designation change of 3668 and 3668-A to “Open to All Motor Vehicles”. Disclose the anticipated impacts of the OHV noise, travelling over open water, on the people at those private properties.

Response 8d

FR3660 does not dead end, instead it extends approximately 0.7 miles to the west from FR3500 to where Forest Service jurisdiction ends and the road becomes the Lake on Three Road. Lake on Three Road is a Houghton County jurisdiction road open to motor vehicles including OHVs. On Map 1 of the EA the Lake on Three Road is shown but was inadvertently not labeled and the legend for the map covers up the western end of the road where it intersects with Forest Highway 16.

The purpose and need for the Eastern OHV Connector proposal “... is to determine which roads and trails would best serve to provide a connection between existing State of Michigan Multi-Use trails and other existing OHV routes on the eastern portion of the Ottawa.”(EA pg. 3). To accomplish the purpose and need, the EA proposes to designate additional OHV access on roads and trails managed under Forest Service jurisdiction, used in conjunction with other routes (i.e. County roads) open to OHVs, in order to provide connections to the State Multi-Use trails. Connecting to other open routes (Forest Service and other jurisdictions) would improve the recreational riding experience and provide connections between communities nestled within the Ottawa.

Under Alternative 2, the rationale for including FR3660 as part of the Iron River – Sidnaw proposed OHV connector route is that its designation meets the purpose and need as it will provide a connection between an existing public road open to OHV use, the Lake on Three Road, to the proposed connector route which in turn would connect to the State Multi-Use trails. Alternative 3 does not include FR3660 because it was determined that the purpose and need could still be met without 3660, though to a lesser extent.

Lake on Three, which is open to boat motor use, has a carry in canoe access that is accessible by highway legal vehicles via FR3668. Page 20 of the EA acknowledges that there are opportunities available in the project area that includes canoeing on area lakes as well as rivers. Lake on Three is included as one of these lakes even though the name of the lake was not mentioned directly.

As stated above, and in the EA page 3, the purpose and need for the proposed routes is to provide a connection to the State Multi-Use trails, specifically on the eastside of the Ottawa, thus the Iron River – Sidnaw route proposal, which includes Forest Roads 3500 and 3660, does not create a segment of OHV connector that concludes at the end of Forest Roads 3668, 3668-A or 3557.

Forest Roads 3668 and 3668-A, by which the private land owners on Lake on Three also use to access their properties, are not part of this proposal to open to OHVs, therefore

there would not be issues with noise from OHV use for these private landowners. The routes would also be signed as closed to OHVs.

Comment 8e:

Disclose the reasons these particular private properties will be provided with direct access to the Eastern OHV Connector after designation changes of 3668 and 3668-A, at a 2008 estimated initial cost of \$40,000 to \$50,000 (see project record), plus additional future costs of monitoring and maintenance.

Response 8e

As state above, FR3668 and 3668-A are not part of this proposal and therefore are outside the scope of this project.

Comment 8f:

24/7 (Note: The following section pertains to Noise impacts to other rec. users)

Recreational camping opportunities exist at Lake Saint Kathryn campground, and Lower Dam Dispersed site. OHV noise would increase greatly due to the addition of OHVs traveling on directly adjacent forest roads currently prohibited to their use. No “Time of Day” restrictions on OHV use on the proposed connector is provided in the EA, and it is reasonable to assume that none have been contemplated. USDA Forest Service, 1993, pages 1 and 2, briefly touches on noise “Day Night Level”, and provides only one reference for further information. Night noise impacts on campground users were not analyzed. Although not included with my comments for this topic, *Harrison, Clark, and Stankey, 1980*, and *Kariel, 1990*, may be useful to the ID Team.

Disclose anticipated nighttime OHV noise impacts on these campgrounds users, other Forest users on the Connector’s affected area as a whole, and occupants of affected in-holdings.

Response 8f

It is expected that, under both action alternatives, a small amount of new OHV use may occur at night on the proposed routes. The Forest Service defers to State Regulations regarding hours of use for motorized vehicles, including OHVs. The State of Michigan does not limit OHV use during specific hours or during the night time. In the experience of Ottawa recreation specialists, night-time OHV riding is limited to the immediate area surrounding communities. Individuals choosing to ride long-distance trails, like the proposed connector routes, to view scenery or visit recreation sites do not typically ride during the nighttime hours. For example, on similar connector trails, such as the Pioneer Trail or State Multi-Use Trails, recreation specialists have seen evidence of almost no use in nighttime hours. Therefore, large amounts of nighttime use of the connector routes would not be anticipated. This is consistent with Charles Nelson’s Michigan” Off-Road Vehicle Plan of 2005 (Nelson 2005). Many of the noise complaints associated with ORV use were in communities.

Despite the limited amount of nighttime use expected, the analysis of effects from noise on non-motorized users presented in the EA (page 17-20), though not explicitly stated, was intended to evaluate noise impacts to non-motorized users at any time, day or night. There are several types of non-motorized users specifically mentioned which would be most affected at night (developed campgrounds and primitive campers, specifically). Effects to these user groups are evaluated in the EA, which concludes, that along the proposed routes there would be an increase in the level of frequency of noise in approximately 0.5 miles on both sides of the routes (EA page 20). It should be noted that under the existing condition, highway vehicle traffic travels on the proposed routes and within the campgrounds (EA page 19). Therefore, the addition of OHVs on some routes is only expected to be a slight change over the existing condition (EA page 20).

Private landownership along routes is minimal. The Iron River – Sidnaw route FR3270 crosses or is adjacent to one private property landowner. This property does not contain structures; FR2127 crosses or is adjacent to one private property which contains structures; and FR3500 crosses or is adjacent to two private property landowners that do not contain structures. The Sidnaw – Rousseau route is adjacent to three private property landowners with two that contain structures. These roads are already open to motor vehicles. The proposed action would only result in a slight increase in noise levels and frequency for these residences, most of which would occur during the day.

The commenter refers to the following references, which are summarized and evaluated for application to this project below:

Harrison, Clark, and Stankey. 1980. Predicting impacts of noise on recreationists. Published by USDA Forest Service Equipment Development Center, San Dimas, CA.

This publication/Project Record explains appropriate applications of the Outdoor Recreation Opportunity Spectrum (OROS) system and the System for the Prediction of Acoustic Detectability (SpreAD). The first half is titled “Determining acceptability of Recreation Impacts – An Application of the Outdoor Recreation Opportunity Spectrum” The principles described in this portion of the document are applied to the Ottawa National Forest at the Forest Plan level utilizing the slightly updated guidance provided in the following: US Department of Agriculture, Forest Service. 1982. Recreation Opportunity Spectrum Users Guide and supplements (1985 and 1986) 101 pp. See the Forest Plan Appendix B (project record). Note the following excerpt which summarizes these principles (and the principles applied on the Ottawa and for this project) very well: *“The basic rationale underlying the OROS is that, through provision of a diverse set of opportunities, one’s ability to find quality in outdoor recreation is best assured. A wide range of tastes and preferences for recreation opportunities exists among the public. For those preferring solitude and minimum of contact with others, primitive opportunities are appropriate. For those who seek a chance to meet and visit with friends in a convenient and comfortable surroundings, modern vehicle-oriented campgrounds are preferable. Providing a wide range of settings that varies in use density, level of development, access, etc., ensures the broadest segment of the public will find the quality recreation experiences that they seek – both now and in the future.”*

The second half is titled “Basics of Sound and System for Prediction of Acoustic Detectability.” This portion of the reference is a “step-by-step guide for the computation of acoustic impact of a particular sound source on a particular listener location.” The process begins with the premise that sound level meters are helpful, but cannot alone measure the impact a noise, but instead the measure of “detectability” is important. The publication covers the basics of how sound works and can be measured, how sound changes with variables such as distance from the listener, foliage, temperature, wind, background sound levels, etc. In addition to these physical properties, two characteristics of the listener affect sound impact: previous knowledge/expectation (if you expect it you are more likely to hear it) and attitude (which controls the maximum level of acceptable detectability). The publication is a “how to” guide for measuring noise levels in the field and then calculating detectability and then placing that into the context of the particular recreation setting of interest to determine impact to the recreationist. The tool also allows you to determine the distance from the source needed to achieve a pre-defined distance of acceptable detectability.

Conclusion on applicability of this resource: The general information provided in this publication is useful, though perhaps outdated. This tool could be useful in identifying important sound thresholds for sensitive receptors or sensitive recreational settings, however, given that the project area is a roaded natural recreation setting, there is limited change from the existing condition expected, and that other literature exists that identifies the approximate distance sound could be anticipated to travel from the proposed routes; this analysis tool would provide a higher level of detail than is necessary for the Responsible Official to make a determination about the significances of the effects presented in the EA. An EA need only present sufficient analysis for the Responsible Official to determine whether or not significant impacts would occur as a result of the proposed action.

Kariel, Herbert G. 1990. Factors Affecting Response to Noise in an Outdoor Recreation Environment. *The Canadian Geographer* 2: 142-149.

This study is peer-reviewed primary literature found in the journal “The Canadian Geographer.” In this study the researchers evaluated campers and hikers “annoyance” levels to various sounds in a Canadian park (identified as a highway-oriented campgrounds). The researchers also measured the level of sounds in an outdoor recreation environment (in decibels/dBAs). Their conclusion for their study was that annoyance is independent of the level of the noise and annoyance was a combination of several factors including the physical properties of the noise and the social-psychological aspects of the sounds. The author states that “sounds that have some level of high intensity or high frequency, which have a rhythmic element or which occur intermittently are more likely to be considered annoying.” The social-psychological aspects of annoyance have to do with whether or not a sound is considered by the listener to be appropriate for the setting. The author notes that “sounds which are interpreted as aiding or benefiting an activity are evaluated positively, those deemed as interfering with or being detrimental to an activity or as being harmful are considered to be displeasing or annoying.” They also conclude that in the context of outdoor

recreation, where the primary goal is to escape urban environments/seek solitude etc., sounds that interfere with this goal are perceived to be more annoying. However, it does note that where sounds are considered an inevitable part of the background they are considered more tolerable, and lists an example of OHVs in the Oregon Dunes National Recreation Area. The author concludes that this information can be used in developing campground regulations and/or design. This study does not specifically address OHV trails or the noise generated by OHVs, but does include some analysis of noise from camper annoyance with highway vehicles and motor bikes (off-road motorcycles).

Conclusion on applicability of this resource: This study can be applied to the OHV Connector EA, and indeed, the principles described here were used in the evaluation. On page 17, the EA notes that Forest visitors choose recreational activities to meet their expectations and that people seeking solitude can be affected by the use of OHVs through displacement due to the sound created by the OHVs. The EA acknowledges the impacts to those seeking a non-motorized experience; however, the EA also notes that the Forest Plan identifies the project area as a Roaded Natural Recreational Opportunity Spectrum, where sights and sounds of other forest visitors are evident; including motorized use.

The commenter referred us to this article in relation to nighttime campground noise. This topic is only briefly addressed in the article, which states that depending on the type of camping the user is participating in, they may be more or less annoyed with various noises (ex. those in a tent may be more sensitive). This is a relevant conclusion that could be applied to this project; however, the study does not indicate that the slight increase in motor vehicle noise, which is already part of the existing condition in the campgrounds, would displace a significant portion of campers.

Comment 8g:

Disclose the reasonably foreseeable effects of nighttime OHV noise on the campgrounds' use/occupancy rate. Disclose any mitigation for this impact that the Ottawa will implement, and whether these remedies will be in place prior to route opening.

Response 8g

The EA acknowledges that forest visitors seeking a non-motorized recreational environment may be displaced by increased presence of OHVs (EA page 17). However, it does note that campgrounds have ongoing motorized use and thus are not considered a non-motorized recreation opportunity (EA page 18). The campgrounds in the area of the OHV Connector Routes (located within 0.5 miles of the proposed routes), include the Lake Saint Kathryn campground and the Lower Dam dispersed camping site. The Lake Saint Kathryn campground is a developed site (provides facilities and water). It is adjacent to the Winslow Lake Road (Iron County Jurisdiction) which is already open to OHVs. The Lower Dam dispersed camping site is a decommissioned campground that is open for camping but provides no services to campers. The Lower Dam site is located in very close proximity to the FR3500, which is currently open to highway vehicles only, and is accessed by a short road which is only open to highway vehicles. This proposal does not include allowing OHVs to use either of the roads that directly access these campgrounds/campsites.

Since these areas are already motorized environments (with highway vehicle traffic) and no changes are proposed within the campgrounds, we would not anticipate a large number of campers to be displaced. However, there may be some instances where the slight increase in noise due to additional motorized vehicles causes campers to be displaced to a non-motorized environment (found in other areas of the National Forest). Similar developed recreation opportunities without an adjacent OHV route are available within 5 miles (Perch Lake Campground - 4 miles, Norway Lake Campground - 5 mile).

Alternatively, the proximity of the Connector Routes, which would provide access to the State of Michigan Multi-Use trails and other motorized recreation opportunities nearby the campgrounds, may increase use of these facilities by those seeking that type of recreation experience. We currently do not have sufficient information to predict with reasonable certainty the specific changes to the amount and patterns of use in the campgrounds, but since the changes in noise level and frequency are expected to be slight, we do not anticipate large changes in the occupancy of these campgrounds. In addition, we know that Lake Saint Kathryn is already adjacent to open OHV routes in county jurisdiction (Winslow Lake Road) and still has consistent visitation. Therefore, mitigations are not necessary.

Comment 8h:

Disclose the time (s) of day that monitoring OHV use will occur at these campgrounds, and the Connector's affected area as a whole.

Response 8h

As shown in the OHV Monitoring Strategy and in Chapter 4 of the EA, monitoring is intended to evaluate impacts to on-the-ground conditions such as types and level of use on routes, evidence on the ground of unauthorized use, and evidence on the ground of resource damage. This Monitoring Plan does not include monitoring the number of OHVs using the routes or the sound levels. In addition, this monitoring would most often occur during the week day work day since that is when staff are available to complete the work.

Forest Service law enforcement officer's work 'off-hours' and help monitor all aspects of recreational use including monitoring for public safety in campgrounds. The Forest Service also enters into cooperative law enforcement agreements with county sheriff's to patrol areas of the forest that include county roads. In addition, at the Lake Saint Kathryn Campground there are campground hosts who work night and weekend hours and who monitor use in the campground and notify law enforcement of any violations or problems that occur. The campground hosts monitor the campground regulations including quiet hours, which are for 10pm to 6am, and are responsible for reporting any issue with noise. If any unexpected changes in the occupancy or experience to these campers occur, the hosts would notify Forest staff.

Comment 8i:

Alternatives?

With or without an Eastern OHV Connector Project, there are no Iron County roads closed to OHV use between the intersection of Winslow Lake Road with FR2127 and Iron River, including the existing IRN-657, Winslow Lake Road, and Ponozzo Road Loop. The maps and the text indicate the Team failed to recognize that the choice of which Iron County Roads to travel will be decided by the route user.

The paved portion of Ponozzo Road, referred to on page 8, is .6 mile in length and includes the bridge crossing of the Paint River. It takes two minutes or less to travel at OHV speed limit. Disclose the importance that the Team found in this, given that a near equal distance of IRN-657, westbound, is also paved.

Response 8i

The purpose of this project is to determine which roads and trails (under Forest Service Jurisdiction) would best serve to provide a connection between existing State of Michigan Multi-Use trails and other existing OHV routes on the eastern portion of the Ottawa. This would be accomplished via the use of forest roads and minor segments of new trail on National Forest System lands in conjunction with other jurisdiction roads (i.e. County roads) that are currently open to OHV use.

The ID Team recognizes that the entire length of IRN 657 is open to OHVs. For each Alternative (2 and 3), the county roads shown in conjunction with the proposed Forest Roads and trails were chosen based on what would be the most logical way that an OHV user would travel between the two State-designated Multi-use Trails. The remaining portions of those county roads that OHV route users could also take, in conjunction with those Forest Roads proposed for the East OHV connector routes (for example IRN 657), are shown on the maps as County Roads. It should be noted that only the roads under Forest Service jurisdiction (highlighted roads and trails on the map and listed in EA Table 1, page 9) are part of this proposal and analysis under both Alternatives.

Comment 8j:

Two alternatives near Sidnaw were randomly matched to two alternatives in the Iron River District, and each pair should have been compared separately. Do so in a Revised EA. Disclose the reasons for not combining the proposed alternative routings at Sidnaw into one configuration.

Response 8j

The Responsible Official must make “a decision encompassed within the range of alternatives analyzed in the environmental documents” (36 CFR 220.4(c)). This does not mean that he must choose from the No Action or Alternatives 2 and 3 exactly as shown in the EA. The Responsible Official may modify the alternatives slightly as long as the resulting decision is encompassed within the range of alternatives analyzed.

It was necessary to evaluate the two alternatives at Sidnaw (Alternative 2 proposes the use of 2011-G and Alternative 3 proposes the use 2011-K) because they would provide different

experiences to OHV riders and would result in slightly different affects (based on the length of Forest Service route proposed in each alternative and the small amount of construction under Alternative 3 for a portion of 2011-K). It is not necessary to combine both alternatives into a single configuration because only one connection in Sidnaw is needed to meet the purpose and need. The Responsible Official will determine which of these two alternatives in this area best meets the purpose and need in the Decision.

Comment 8k:

Enforcement

According to the Ottawa's 2012 Law Enforcement Agenda and Action Plan, between October 1, 2010 and September 30, 2011, TWO violation notices were issued for "OHV incidents". It is not disclosed whether OHV use factored into violation notices in other incident categories. There were 48 incident reports related to "OHV incidents". Considering the amount of unauthorized OHV use that has, and continues, to occur, this is dismal. Considering the Size of the Ottawa, and the two LEOs available, assisted by 13 FPOs during FY2011, this is understandable. According to the EA between September 30, 2011 and August 31, 2012 the number of FPOs grew from 13 to 30.

Disclose the number of FPOs who are in the Forest on a daily basis for the majority of their workday.

Response 8k

The numbers presented in the EA, page 30, reflect the current number of forest protection officers (FPOs) trained, certified and working on the Forest. All of the FPOs are certified to issue citations for violations of certain Forest Service regulations. Of the certified FPOs 13 are typically in the Forest on a daily basis, however, law enforcement is not their primary duty. Only the law enforcement officers (LEOs) spend the majority of their workdays on law enforcement activities. The 13 FPOs listed in the LE Agenda are consistently called upon to help monitor for motorized use (and other) violations during periods with high visitation, such as hunting seasons or holiday weekends. Many of the other 17 trained FPOs are certified due to requirements of their position in fire or timber management and, though they are also authorized to aid in enforcing travel management and other forest regulations, they spend the majority of their time on different activities.

Comment 8l:

2 - The EA, page 28, states that post-opening monitoring will occur twice, during "at least" the first two years, which is inconsistent with a five year road reconstruction and widening program. Disclose the role and sought input of Law Enforcement personnel in these two monitoring events.

Response 8l

A law enforcement officer is assigned to the Ottawa Travel Management Steering Team and thus was closely involved with the development of the OHV Monitoring Strategy. As stated in the 2012 Ottawa LE Agenda (Project Record), the LEOs will participate in the

Forestwide OHV Monitoring. In the summer of 2012 a large number of roads were monitored by LEOs while they carried out their patrolling duties. They may participate in the post-opening monitoring should the proposed routes be implemented, but it is expected that a dedicated crew of employees will be trained to take on the work and LEOs would only supplement that activity. All monitoring crews are trained to report violations of regulations to the LEOs and monitoring data will be provided to the LEOs if it's determined additional law enforcement efforts are needed.

The 5-year Reconstruction Strategy is not related to the OHV monitoring program. It sets a schedule to prioritize the design criteria identified to improve safety in the dual use environment proposed (refer to Response 8m and 10a, 10b, and 10c below). The OHV Monitoring described in Chapter 4 of the EA will occur on the OML 1 and 2 roads adjacent to the proposed routes, but will not occur on the OML 3 and 4 roads for which reconstruction is proposed. These higher level roads are evaluated for maintenance needs by engineering staff according to their normal maintenance schedule, which typically includes grading the roads two times a year. Staff are on these higher level roads often enough that there is not a schedule for monitoring them - maintenance issues on high level roads are reported and fixed promptly.

Comment 8m:

Safe Dual Use Environment

A speed limit of 35 mph is not a safe dual use speed limit. If a sudden stop is required, highway legal vehicles have longer stopping distances and are less maneuverable. Horizontal and vertical sight distances are reduced with greater frequency on forest roads than on County roads.

According to the EA, road reconstruction and widening is planned to be completed five years after the connector is opened for use. No one should find this acceptable. This does not ensure safety, it guarantees an unsafe Connector Route. Motorists are responsible for safe driving; The Ottawa is responsible for safe roads. Signage on unsafe roads passes the Ottawa's responsibilities onto motorists. Safe roads prior to route opening must be a priority, not a condition assumed to be achieved in time. These roads will also be used by tourists and by forest users whose destinations are beyond these site specific locations. All users would be unknowingly placed in harm's way through neglect on the part of the road's owner. "Get it Open" appears much more important than "Get it Right", and at any cost to motorists. From engineering reports, analysis for motorized mixed use designation, disclose the marked ratings for #9, "Risk without mitigation", for forest roads 3270, 2127, 3500, 2009, 3660, 1300, 1460, and 1100.

Disclose the meanings of "Crash probability: High, Medium, and Low" and "Crash Severity: High, Medium, and Low".

Response 8m

The Speed factor considered in the Mixed Use Analysis Reports is not to be proposed as an enforceable "Speed Limit" but an estimate of the 85th percentile average speed for the subject road. This estimated speed is derived by driving the subject road in both directions paying attention to factors such as necessary speed changes and driver comfort. This

estimated speed is not intended to represent the speed at which a driver will maintain a constant speed through the entire road length. Road segments where vertical and/or horizontal curves or other sight distance or other impedances exist will result in lower speeds through those segments, as will straight, open sections will result in higher anticipated speeds. Estimated sight and stopping distances are factors considered in the Crash Probability ratings for each road.

There are no mitigation measures or traffic control devices that can be put in place that will ensure safety. Mitigation measures and traffic safety devices are intended to reduce the expected crash probability or reduce the severity of damage or injury in the event of a crash. The proposed signage on the connector route is not intended to transfer responsibility or liability from or to any parties but to inform operators of a potential traffic condition that may not be expected and therefore reduce crash probability. The strategic approach, as shown in the reconstruction tables for FR2127 & FR3500 and the Summary of Dual-Use Analysis, Recommendations, and Estimated Costs, account for the variability in levels of crash probability and propose to address the High risk segments immediately upon decision and the moderate and low risk segments to be reconstructed in phases encompassing a five year plan.

High risk segments include curves that due to conditions such as radius, degree of curvature, roadside brush, or other sight distance issues, are estimated to have a higher risk than other, more moderate curves identified as moderate (see Project Record). The reconstruction of these high risk curves will be completed by the Forest road maintenance crew upon decision.

Moderate to low risk segments, which includes moderate curves and straighter road segments where width is under 18 feet (18'), would be reconstructed in phases as stated above. The identified moderate curves due to their lesser degree of curvature or radius, do not present as severe sight distance or other safety considerations. The identified road segments under 18' that are straighter are also flatter or otherwise present better sight distance conditions than other <18' areas present a lesser risk.

Crash probability is the estimated likelihood of a crash on a road resulting from exposures to factors affecting traffic safety. Factors include primary use, crash history, traffic volume and type, speed, road surface type, as well as others. Examples of High, Medium, Low would be as follows:

- **High** – Road with a documented or known history of crashes or near misses, high traffic volume, higher speeds (>40mph), inconsistent roadway where drivers will encounter unexpected conditions, and poor visibility through many or all areas.
- **Medium** – Road with either no known or infrequent or isolated crashes, moderate traffic volume, moderate speeds (25-40mph), few inconsistent segments or unexpected conditions, poor visibility in few segments.
- **Low** - Road with no known or documented crashes, low traffic volume, consistent roadway where drivers and operators do not encounter unexpected conditions, low speeds (<25mph), good visibility throughout.

Crash severity is the probable degree of property damage or personal injury resulting from a crash on the road. Factors that may affect the severity of crashes include roadside conditions, speed, and traffic type. Examples of High, Medium, Low would be as follows:

- **High** – Road with high/steep constructed embankments and large, unyielding obstructions such as large trees and boulders are close to the edge of the traveled way with very little or no clear zone, higher speeds (>40mph), large difference between vehicles (i.e. log trucks vs. OHV's). High severity rating is given where there is a likelihood of major property damage, critical injury, or fatality.
- **Medium** – Road with fewer or lower/flatter constructed embankment segments, fewer roadside obstructions or larger clear zone, and more moderate speeds (25-40mph). Medium rating is given on roads where there is a lesser likelihood of major property damage, critical injury, or fatality.
- **Low** – Road with very few or no high constructed embankment segments, very few or no roadside obstructions or low speeds (<25 mph). Low rating is given where crashes are anticipated to have only minor property damage.

Note that the EA does include the following design criteria:

- 1) *Post speed limit signs on OML 3 and 4 roads proposed as part of the connector routes to encourage safe dual-use speeds (Forest Roads: 3270, 2127, 3500, 2009, 3660, 1300, 1460, and 1100). The speed limit will be consistent with those limits imposed by the State of Michigan, county or township, as applicable.*

Staff have determined that federal, state and county speed limits for OHVs and highway vehicles vary, such that, it would be difficult to enforce the same speed limit for all types of motor vehicles on the proposed routes and still be consistent with other local limits. Therefore, the design criteria will be removed in the final Decision. The speed of motor vehicles on any route within the Ottawa where a speed is not posted, is governed by the following Forest order:

Operating on National Forest System Roads in violation of posted speed, load, weight, height, length and width limitations. National Forest System Road speed limits are 35 MPH unless otherwise posted. (36 CFR 261.54d)

However, county ordinances require that OHVs operating on county roads operate at speeds less than 25 miles per hour (Houghton and Ontonagon Counties) and 20 mph (Iron County). These regulations do not apply to highway legal vehicles, which can legally operate at higher speeds. Since different jurisdictions require differing speed limits, we cannot post a single consistent speed limit on these dual-use routes. Thus, we will increase efforts to inform vehicle operators about speed limit regulations on the Forest through press releases and other methods. More importantly, vehicle operators must educate themselves about the regulations of the areas in which they travel. It is also important to note that, if individuals are operating in a careless and reckless manner, law enforcement officials have the ability to issue a citation regardless of the speed at which they travel.

Comment 8n:

Conflict, Displacement, Demand

The noise of OHV activity is not sought out by non-motorized users. The noise is brought to them, to their activity, to their use, to their day, and into their limited amount of time. Visitors judge the importance of impacts based on their expectations regarding what they will find at a particular location. *Harrison, Clark, and Stankey, 1980*, page 3, states, “This judgment, in this context, has two possible outcomes: The impact is acceptable and does not detract from their satisfaction. The impact is unacceptable and may lead to a decline in user satisfaction and, perhaps, in a decision never to return to that location.”

Yankoviak, 2005 page 40, states, “It is not uncommon for non-motorized recreationists to be displaced to another setting or leave the area altogether where motorized use is common...”. And on page 42 states, “Region One Forest Service managers report anecdotal evidence of displacement as well, though they do not know the number of visitors displaced. Through written public comments during travel planning, phone calls from recreationists, and editorials in local newspapers, recreation managers on the Gallatin, Lewis and Clark, and Helena National Forests hear of non-motorized recreationists avoiding trails that receive motorized use (Gallatin NF, 2005; Helena NF, 2005; Gallatin NF, 2005; Lewis and Clark NF, 2005, personal communications). While managers largely estimate that a small percentage of users are displaced, they admit they have no data to back up these assertions. “ Further on, “Indeed, lack of data is a problem for understanding how common displacement really is.” *Bleich, 1988*, states on page 163, “Unfortunately, studies of ORV effects found that public land managers have mistaken displacement of traditional recreationists by ORV users as a reflection of decreased demand for traditional recreation. Land managers who observe a site with ORV’s and no pedestrians plan Additional sites for ORVs. Thus, managers continue to allocate more recreational land and facilities to a group that has suppressed or displaced traditional recreationists. These studies conclude that, in effect, ORVs may be Shrinking the amount of land (and opportunities) available for non-ORV recreation and thus reducing recreation overall. One survey found that, as a result of growing user conflicts, ORV management was one of the most important issues among federal forest managers. Consequently, land managers are forced to balance the need to provide public lands for recreation – especially for those individuals who otherwise might not use these public lands – against the possibility that increased ORV usage will impair the land, disrupt other recreational experience, and ultimately reduce both the amount and quality of public land use.” (words in italics are here underlined) WDNR, SCORP, 2005, 12 pages, and *Yankoviak, 2005*, 18 pages, are provided herein to verify the complexity and substantial impact of conflict, assured displacement, and incorrectly perceived decrease in demand for non-motorized forest uses that OHVs create.

The analysis of this topic provided in the EA is virtually non-existent; Disclose analysis of conflict, assured displacement, and incorrectly perceived decrease in demand for non-motorized users.

Response 8n

This issue is specifically highlighted in the Environmental Assessment, which acknowledges non-motorized users seeking solitude may be affected by the proposed use of OHVs and that one affect may be displacement (EA page 17). Though the EA does not specifically

describe this as a conflict, it does note that non-motorized users may experience effects of the proposed action. The EA used literature that estimated that OHV noise may be audible for approximately 0.5 miles from open routes and that non-motorized users may be impacted in these areas (EA page 19-20). However, these impacts are expected to be only slight changes from the existing condition, since these routes are already open to motorized vehicles.

The Forest Service identifies the recreational settings provided using the Recreation Opportunity Spectrum (ROS) (see page 14 of the EA for more information). In the Ottawa National Forest Land and Resources Management Plan, each Management Area is classified using the ROS. The proposed action falls completely within Management Areas classified as “Roaded Natural” which means there is moderate evidence and interaction with other users, including sights and sounds. In other more remote and undeveloped areas of the Forest, the Forest has classified management areas for primitive and semi-primitive non-motorized experiences. The EA acknowledges that visitors seeking a more primitive setting may be displaced from the Roaded Natural environment by the sights and sounds of other users (page 17-18); however, there are nearby opportunities within the Ottawa National Forest to have a non-motorized experience. There are 127,750 acres of semi-primitive non-motorized areas on the Ottawa National Forest, including 49,750 of designated Wilderness. Non-motorized areas are characterized by a predominantly natural or natural appearing environment where interaction between users is low and motorized use is not permitted.

Though we do note that there is, in general, an increase in demand for OHV use both locally and throughout the National Forest System, neither the EA nor the Forest Plan predicted a decrease in demand for non-motorized use. Though it was referred to in the literature provided (see review of literature below), such perception is not documented in the EA because we have no evidence that a decrease is occurring on the Ottawa. Comparisons of the National Visitor Use Monitoring (NVUM) completed in 2003 to that in 2007 (USDA Forest Service 2012 and USDA Forest Service 2008) do not show any substantial differences in any non-motorized categories in relation to motorized categories.

It should also be noted that since the 2006 Forest Plan and the implementation of the 2005 Travel Management Rule (with first publication of the MVUM in 2007), the physical area of the Ottawa that is open to OHVs has been substantially reduced due to the prohibition of cross-country motor vehicle use. At the same time, the area of the Forest specifically designated for non-motorized use has not changed substantially (see Appendix B of the Ottawa Forest Plan - “generally, the character of the Ottawa has remained mostly unchanged since the 1986 Forest Plan.”). In addition, National Visitor Use Monitoring Results indicated that the visitor perception of crowding in the General Forest Area (GFA) shifted to less crowded between 2003 and 2009 (Ranging from 6-10 in 2003 down to a 1-6 in 2008, with 10 being “overcrowded” and 1 being “hardly anyone here”) (USDA Forest Service 2008).

USDA Forest Service. 2012. Visitor Use Report: Ottawa National Forest, National Visitor Use Monitoring 2007 Data.

USDA Forest Service. 2008. National Visitor Use Monitoring Results, Data Collected 2003 and 2007, Ottawa National Forest.

The commenter refers to the following references, which are summarized and evaluated for application to this project below:

Yankoviak 2005

Yankoviak, Brenda M. 2005. Off-Road Vehicle Policy on USDA National Forests: Evaluating User Conflicts and Travel Management (*Note: the reference provided did not indicate a source, but an internet search showed the reference is a section of a Master's Degree Thesis presented at the University of Montana. A copy of the full thesis is saved in the project record*).

The stated purpose of this thesis was to evaluate the then new 2005 Travel Management Rule. The author states that *“Given that the Forest Service’s new travel management policy is aimed in part at reducing user conflicts between motorized and non- motorized users, the purpose of this paper is to assess its potential effectiveness in minimizing such conflicts.”* The thesis uses literature from a national perspective, but does tend to focus on the particular context of the National Forests of Region 1 (Montana, Idaho, North Dakota), which does present a different recreation situation than the Ottawa National Forest.

The section provided with comments, *“reviews recreational conflict literature to define conflict in general and the conflict between motorized and non-motorized users specifically, then discusses the social impacts of noise and displacement that may result from motorized recreation.”* The review shows that *“when one party perceives the actions of another as interfering with their recreational goal, the party is likely to experience conflict.”* It notes that the conflict, though mostly may be perceived by those who prefer non-motorized experiences who have less tolerance for mechanized users, the conflict is also perceived by motorized users. The latter perspective has not been analyzed as much, however, the author notes that *“the conflict for motorized users may stem from off-site interactions when other user groups seek to restrict motorized access and issue complaints about ORV use to land management agencies. Forest Service recreation managers in Region One report many motorized users are feeling disenfranchised and frustrated that they keep “losing trails and areas” to ride.”* The bottom line here is that different types of users have different recreational goals, which may conflict. Alternatively, even when users have the same goal (such as nature viewing, solitude), their different use of technology to achieve that goal may conflict. The author also notes, that much of this conflict is rooted in value differences: *“the emotionality of this conflict can in part be attributed to larger value differences that influence beliefs about the appropriate management and uses of public lands and the appropriateness of certain activities in a given setting.”* The author notes that recreationalist will engage in coping behaviors to reducing this conflict including: “1. *Rationalization*-The user changes his/her perception of the experience to essentially convince him/herself that the experience was pleasurable. 2. *Product shift*- The user

adapts his/her expectations to meet the actual experience. 3. *Displacement*- The user decides to alter travel patterns to avoid significant dissatisfaction. Displacement can be either temporal (by day of week or season of use) or spatial (going to another location within the same area or going to an entirely new area).” The author concludes with recommendations on the application of the Travel Management Rule within the Forest Service.

Conclusion on applicability of this resource: The reference supports the analysis in the Environmental Assessment, which acknowledges that non-motorized user experiences may be affected by motorized use and may result in displacement. It should be noted that the Ottawa aims to balance these conflicts of users on the Forest through the use of identify Recreational Opportunity Settings throughout the Forest during Forest Plan revision, which follows two of the recommendations made by the author to 1) plan for OHV use and a balance of recreation experiences at a larger scale, and 2) utilize recreational opportunity settings to set user expectations. It is also important to point out that much of the discussion of noise and issues related to OHV use boil down to values and opinions individuals have about the appropriate use of motorized vehicles on the National Forests (a point which the author makes in this thesis).

Bleich 1988

Bleich, Jeffrey L., 1988. Chrome on the Range: Off-road vehicles on Public Lands (An Agricultural Law Research Article). *Ecology Law Quarterly* 15 (1). P.1 59.

Summary of the citation: This is a law review article from the late 80’s focused on the lack of uniform law and policy regarding ORV use of federal lands. “Section I considers the various issues and sources of conflict in ORV management. Section II reviews present judicial and legislative efforts to resolve ORV disputes. Section III evaluates the ongoing ORV litigation concerning the Cape Cod National Seashore and demonstrates that the failure of both Congress and the public land agencies to establish management guidelines has frustrated effective management.” The remaining portions of the review discuss the recommendations for the applicability of NEPA and cost-benefit analysis related to ORV use.

The commenter provides the following quote from this publication:

Bleich, 1988, states on page 163, “Unfortunately, studies of ORV effects found that public land managers have mistaken displacement of traditional recreationists by ORV users as a reflection of decreased demand for traditional recreation. Land managers who observe a site with ORV’s and no pedestrians plan Additional sites for ORVs. Thus, managers continue to allocate more recreational land and facilities to a group that has suppressed or displaced traditional recreationists. These studies conclude that, in effect, ORVs may be Shrinking the amount of land (and opportunities) available for non-ORV recreation and thus reducing recreation overall. One survey found that, as a result of growing user conflicts, ORV management was one of the most important issues among federal forest managers. Consequently, land managers are forced to balance the need to provide public lands for recreation – especially for those individuals who otherwise might not use these public lands – against the possibility that increased ORV usage will impair the land, disrupt other

recreational experience, and ultimately reduce both the amount and quality of public land use.”

Conclusion on applicability of reference: The recommended analysis and review regarding the balance of motorized/OHV and non-motorized recreation on the Ottawa National Forest was determined at the Forest Plan level. The proposed routes are in compliance with Forest Plan objectives, standards and guides regarding miles of routes, location of routes, and recreational settings. Therefore, this reference has minimal application at the project level. However, the EA does evaluate the potential impacts to the non-motorized user of this particular project.

It should be noted that the Forest Plan and the Alternatives proposed comply with current Forest Service OHV policy – the 2005 Travel Management Regulations (36 CFR 212) and NEPA.

Comment 8o:

Displacement will translate into fewer unauthorized OHV use incidents being witnessed by Forest visitors and reported to Ottawa staff. Disclose planned increased law enforcement patrolling and other measures to compensate for displacement.

Response 8o

Visitors do occasionally report OHV incidents to Ottawa staff and law enforcement. However, we would not anticipate a large change in this as a result of the Proposed Action. We anticipate that only a minor amount of displacement of non-motorized users will occur, and of that, a very small amount would be those contributing to visitor reports of OHV incidents. The primary source for reports of OHV incidents are visitors in campgrounds and other motorized users. In fact, the Ottawa is currently working on a trail ambassador program with the local trail riders organization (Mi-TRALE) to assist the Forest in educating OHV users about our rules and regulations and for reporting violations to law enforcement. See Response 8n related to displacement.

Chapter 4 of the EA demonstrates increased efforts to monitor the effects of OHVs on the ground to assure that any unforeseen impacts or instances of unauthorized use are managed and addressed. In addition, we plan to increase signing and improve the effectiveness of closure devices where warranted. This is expected to reduce the number of violations by helping visitors understand where it is legal for them to use motor vehicles. There are no plans to increase law enforcement patrolling, though it is thought that the increased signage and monitoring will help law enforcement officers increase successful prosecution when issuing violations.

Comment 8p:

Disclose contemplated plans to accommodate the assured displaced non-motorized Forest users in nearby areas not impacted by OHV use on this Connector, recognizing that demand has not decreased.

Response 8p

The EA acknowledges that there may be a slight increase in the amount and frequency of noise along the proposed route if opened to OHVs, when compared to the existing condition. The EA also notes that some non-motorized users may be displaced by OHVs (see also Response 8n). The number of non-motorized users that use the general forest area (undeveloped or dispersed areas) adjacent to the proposed routes (within the 0.5 mile distance to which the majority of the noise impact would occur) is unknown. We cannot predict how many of this unknown number of Forest visitors would be impacted by the noise to the level where it causes them to be displaced. Some visitors may simply adjust to the slight increase in noise through rationalization or product shift as described in Yankoviak 2005 [1. Rationalization-The user changes his/her perception of the experience to essentially convince him/herself that the experience was pleasurable. 2. Product shift-The user adapts his/her expectations to meet the actual experience.] Given that this area is not a non-motorized setting, but rather a roaded natural setting where sights and sounds of motorized use are already occurring, we could even presume that most of the users would adjust to slight increase in noise levels.

If forest visitors seeking a non-motorized experience are displaced by the slight increase in the level and frequency of noise, there are ample opportunities to find a more primitive recreation opportunity nearby within the Forest. There is an area designated as semi-primitive non-motorized just west of Forest Highway 16 approximately 7 miles from the proposed routes. On the northern portion of the proposed routes, there is semi-primitive motorized and semi-primitive non-motorized area in the vicinity of the Sturgeon River Gorge approximately 2.0 and 5.0 miles respectively, from the proposed route.

Comment 8q:

Disclose planned designation of roads and trails leading to and inside campgrounds and other facilities, for use by Connector OHV riders, After non-motorized user displacement occurs.

Response 8q

See also Response 8n regarding displacement.

Designation of campground or other facility roads for use by OHV riders is not part of this proposal. The campgrounds would remain open to highway vehicles for the foreseeable future. Aside from Lake Saint Kathryn (developed campground) and Lower Dam dispersed camping areas; there are no other ‘facilities’ that are accessed by roads in the vicinity of the proposed routes. There are undeveloped carry-in boat accesses in the area (Glitter and Glare Lakes) which can currently be accessed by OHVs and Highway Vehicles, but they would not be directly accessed via the proposed Connector Routes.

It should be noted that none of the developed or dispersed recreational facilities or campgrounds in the vicinity of the proposed routes are currently considered non-motorized as they do allow for highway vehicle traffic (EA page 20). Therefore, there would be no displacement of non-motorized users in these areas, as the vast majority of users access these areas via motor vehicles already.

Non-motorized recreation opportunities outside of these facilities such as canoeing, hiking, fishing, or backcountry camping are expected to be minimally impacted due to a slight increase in noise levels and frequency over the existing condition (EA page 20).

Comment 8r:

The Proposed Action

The proposed action would include 6.9 miles of an unnecessary East/West oriented road on a North/South Connector project. An impact that could be used to compare alternatives is the safety concern created by the dual use of 3270 (The blinding sun hazard during the early or late hours of daylight). This remains ignored. The prospect of head-on collisions of highway legal vehicles with OHVs, each travelling up to 35 mph, is surely worth analyzing. Simple human observation is all that is required. Similar circumstances are already within the experiences of any driver presently employed by the Ottawa. The Ottawa employs 2 LEOs and 30 FPOs that could provide sworn statements of their observations. Disclose the analysis that has been performed.

Response 8r

A Motorized Mixed Use Analysis has been completed for FR3270 and is in the project record. Part of the analysis involves driving the road and observing driving conditions. While sight distances and sunlight conditions do play a role in the operational safety of any road, there are also many other factors considered.

Comment 8s:

The FEIS, page 3-202, states “OHV recreation also contributes to a community’s economic welfare. Vendors receive revenue from the direct sale of food, gas, and supplies to visitors. Additional revenues are generated from visitors lodging and dining at local hotels and restaurants.” The proposed action diverts OHV users away from Iron County’s Iron River-Caspian-Gaastra community, while incorporating Iron County roads that the Iron County off-road recreational vehicle ordinance opened to ORV use in an effort to enhance the county’s economic welfare.

Response 8s

Refer to Response 5.

Comment 8t:

The proposed action would include one unnecessary WSR corridor crossing, [FR3270]

Response 8t

As described in Section 3.6.3 of the EA on pages 25-27, there are no impacts to the South Branch Paint WSR corridor as a result of allowing OHV use on the crossing of FR 3270. In addition, this route is currently open to highway-legal vehicles.

Comment 8u:

[The Proposed Actions] introduce new NNIP along most of 6.9 miles of 3270 and .7 mile of 3660, and each of several miles of intersecting OML 1 and 2 roads and trails, plus adjacent native plant communities and nearby natural areas.

Response 8u

The effects of the proposed actions on the spread of invasive plants were considered as Issue 2 in the EA and discussed on pages 20 to 23. We acknowledge that an indirect effect of Alternatives 2 and 3 would be the spread of non-native invasive plants along the routes and into adjacent habitats. These effects are consistent with those projected in the Forest Plan FEIS.

Comment 8v:

It [Alternative 2] would introduce noise produced by increased OHV presence on many square miles of the Ottawa, and displace non-motorized users who currently enjoy these areas while being impacted rarely by such disturbances.

Response 8v

The EA does acknowledge that there may be a slight increase of noise adjacent to the proposed routes and that motor vehicle noise may displace those seeking a non-motorized experience (see also Response 8n). However, it should be noted that under the existing condition there is already noise from motor vehicles, and noise from OHVs along the County roads that are already open to OHVs. See the description of the No Action alternative on page 19 of the EA: “Vehicle traffic would be audible along the existing Forest and county roads. OHV use would continue to travel those county roads open to OHVs....”

Comment 8w:

It [FR3270] would also create the foreseeable loop by use of 3270, 3475-S with the illegal use of 3475.

Response 8w

As part of the OHV Monitoring Strategy to identify and mitigate where unauthorized use of roads by OHVs is occurring along the proposed connector routes, the signing and monitoring of roads closed to OHVs, which would include FR3475, would occur.

Comment 8x:

The Distance That Noise Can Be Heard by Non-Motorized Recreation Users Appropriately, can be heard by human beings is the measure to be used for analysis of Environmental Consequences. Decibel measurements of monitors, microphones, recordings, and machinery of any sort may be interesting, but they are not “non-motorized recreation users”, and measure neither noise impact on the “the non-motorized recreational experience of Forest visitors” nor “noise impacts to non-motorized recreation opportunities for Forest visitors”. Therefore, what gleanings can be found in the two references in the EA that relate to noise that

was heard by the human beings operating the machines, at what distances, plus any other general information concerning human hearing?

From USDA Forest Service, 1993, text and table 2 field data, I provide the following chart.

Run #	Location of Measurement	Cycles on Course #	Distance of instruments to Motorcycles	Remarks
5	B	1	1900-4000'	Motorcycles not audible
6	B	1	1900-4000'	Motorcycles not audible
14	B	2	2500' to about 1 mile	Motorcycles audible last 1.5 minutes
1	A	1	1100 – 5000'	Motorcycles clearly audible
2	A	1	1100 – 5000'	Motorcycles clearly audible

Put another way:

Two Tests: Not Audible at 1990'

One Test: Audible last 1.5 minutes at 2500' to about 1 mile

Two Tests: Clearly Audible at 1100 to 5000'

Using this information, the author inexplicably concludes, "...not audible at distances beyond 1900 ft. ...", which is obviously wrong, and also states, "No attempt was made to accurately determine at what distance motorcycles could or could not be detected." On page 2, the following is stated: "It should be mentioned at this point that a sound source such as a motorcycle can be clearly audible above the background." Kariel, 1990, page 147, states, "As the primary reasons for visiting outdoor recreational environments are to escape the noise of urban areas, enjoy the natural scene, reduce tension, and obtain tranquility or solitude, sounds that are felt to interfere with these experiences will be considered as annoying. In this connection it should be mentioned that, since sounds are detectable, and hence identifiable, from great distances and at very low levels, even without registering on a sound-level meter, they can be intrusive and provoke reactions." A map of the test site showing "North" was provided on page 4. From the study are the following phrases with the page numbers upon which they can be found. Page 3: "wind screens were employed", Page 5: "Gusty winds", "wind gusts" (twice), "gusty wind" (six times), "wind noise greater", Page 6: "wind was gusty". Nowhere in the study was wind direction provided. The EA, page 19, states "There are several variable that can influence sound levels at a distance. These include wind speed and direction,...".

USDA Forest Service, 1975, also used monitors, microphones, and the like (machinery) to measure motorcycle and jeep noise. Monitors and tape recorders were 50 to 250 feet from jeeps, 100 to 140 feet from motorcycles. It is reasonable to assume that all vehicles could be heard by humans at these distances, however, that was not stated. The measured decibel levels were used to calculate, using probability in place of ears, distances that jeeps and motorcycles should be heard not could be heard, much the same as computer-modeling values of mortgage-backed securities. No data pertaining to distance that the noise could be actually heard by humans was included.

Using these two studies, the actual distances that motorcycles were heard by these humans, from actual field data, is a distance of up to 5000 feet to 1 mile. A broad swath of OHV noise will

fragment the Ottawa for the non-motorized users, displacing and concentrating them in the remaining quiet pockets (such as, remaining campgrounds). More about the swath will follow these two details.

Response 8x

A-weighted decibels (dBA) are the common measure of environmental noise impacts. State noise emission standards are all evaluated in dBAs. dBAs are measured by devices, however, the intent of the measurement is to estimate the effects to the human ear. In that way, dBAs serve to approximate the impacts of a sound on the human environment and we can use them as a tool to describe impacts in a quantitative way. See the reference provided by the commenter entitled ‘Section 4.13.1 - Fundamentals of Acoustics and Vibration’ (it’s an excerpt from Leigh Pemanente Quarry Reclamation Plan Amendment, Draft Environmental Impact Report):

“The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental sounded levels, perception of loudness is relatively predictable, and can be approximated by frequency filtering use in the standardized A-weighting network. There is a strong correlation between A-weighted sound levels (expressed as dBA) and community response to noise. For this reason, the A-weighted sound level has become the standard descriptor for environmental noise assessment.”

However, it is noted in the EA, that dBAs are not the measure of effects to non-motorized users. In fact, the indicator measure for this issue (listed in the analysis framework) is “distance noise can be heard by non-motorized recreation users.” The EA uses references that estimated the distance at which noise can be heard and the sound levels at various distances. The conclusions reached in the references (as stated by the authors) are included for reference below as it appears the commenter has taken some of this information out of context:

USDA 1975 Forest Service –

- 1. The data “*indicates that at a distance of about ½ mile or less under average forest background conditions, about 5 percent of the vehicles present would be barely detected. It does not mean that vehicle noise would be present 5 percent of the time. It does mean that, at the distance shown, if 50 vehicles per hour travel the vehicle track, at about ½ mile away under average forest background noise conditions, the average observer would barely detect two or three vehicles per hour. It is not likely that the duration of the signal which the observer detects would be greater than 1 or 2 seconds at the most.*”**
- 2. “*For all practical purposes, in the forest conditions presented by the Wayne-Hoosier National Forest, the maximum distance at which a vehicle may be heard ranges from approximately 4500 feet for jeeps operated on level ground to approximately 7500 feet for hill climbing jeeps and motorcycles.*”**

USDA 1993 Forest Service –

1. *“The data gathered substantiates that at distances of 400 feet or greater, motorcycles which meet the State of California and USDA Forest Service 101 dBA limit will not cause sounds loud enough to impact the hearing of people.”*
3. *“At distances of 400 feet or greater, it is impossible to say that 5 motorcycles normally ridden increase the measurable ambient sound level, when such level is assessed using equivalent level.”*
4. *“Sounds produced by 5 motorcycles ridden on typical motorcycle trails are detectable, at least occasionally, by observers listening for motorcycles at distances up to one half mile under terrain, vegetation and weather conditions presented in the Rock Creek OHV Area.”*

It is apparent from the commenter’s interpretation of the data and from the Forest’s interpretation of the data, that noise produced from OHVs in a forest setting is a complex issue. Both studies allude to the following:

The USDA Forest Service 1975 study states:

“An increase in sound pressure level does not necessarily connote a corresponding increase in annoyance or any other adverse reaction, as physical measurements cannot include an assessment of the attitudes of the listener. Listener attitude is the most important parameter in the determination of annoyance under forest conditions” (p.3).

The USDA Forest Service 1993 study states:

“No attempt was made to accurately determine at what distance motorcycles could or could not be detected. The detection of audible signals in a background sound is an extremely complicated statistical process, which is not useful for the prediction of the audibility of specific incidents. The measurements made were an attempt to determine whether or not the motorcycles, as typically used for off-road recreation, on typically used riding courses, were likely to cause a measurable impact upon the environment at typical listening locations. The data confirm that, although in some cases the motorcycles were audible at the measurement locations (could be detected as being present by carefully listening observers who knew what they were listening for) no measureable sound increase occurred” (p.6).

Both the references and EA note that some noise may be heard beyond ½ mile and some noise can be detected by the human ear while the sound may not be shown in measurements as different from the background environment (USDA 1993). An attempt was made to describe the noise level of OHVs (decibels) in relation to distance, and the amount (5%) of traffic that could be detected at a distance equal to or beyond 0.5 miles of OHV trails and routes based on literature research. Detection of OHVs noise on the non-motorized forest visitors is dependent upon many factors such as but not limited to OHV speeds, terrain, vegetation, wind direction, distance between hiker to OHV activity, and surrounding natural forest noise (background noise).

The EA appropriately relies on the cited references to provide estimated effects from noise on non-motorized users.

Forest Plan objectives include opportunities for both motorized and non-motorized recreation. Designating the proposed routes implements the Forest Plan’s desired condition relative to OHV use (Forest Plan p. 2-4). Although commenters may prefer not to see additional motorized opportunities, the Forest Plan allows such use and anticipated its development by addressing new connector routes. The Forest Plan likewise evaluated effects at the programmatic level and disclosed them in the FEIS (p. 3-202) by stating:

“However, negative social effects may also result from motorized recreation. People that seek solitude in a forested setting or engage in non-motorized activities can be affected by the use of OHVs. An effect is the displacement of some users seeking solitude, such as hikers, mountain bikers, backpackers, primitive campers, bird watchers, and some hunters. This is generally attributed to noise that can be generated from OHVs. It can be disturbing for recreationists engaging in a non-motorized activities to encounter OHVs, particularly in distant or secluded areas.”

A similar conclusion is reached on in the EA, page 19.

Forest policy, enacted with the 2006 Forest Plan and 2007 MVUM (and in compliance with TMR), to restrict motor vehicles to designated routes and prohibit cross-country travel by motor vehicle contributes to maintaining the remote character of the Ottawa.

Finally, it is important to consider the existing environment before measuring effects. Currently in the areas within 0.5 miles of the proposed routes there are 10 miles of forest system roads open to all motorized vehicles, 56 miles forest system roads open to vehicles 50 inches or less, and 3.5 miles of county road open to all motorized vehicles. The addition of 41 miles of additional OHV access within this existing environment would result in a minor change from the existing condition.

See also response to comments 8n regarding displacing users and impacts to campgrounds.

Errata note: the following table, an excerpt of which is provided by the commenter was inadvertently left out of the EA. It is included here and is incorporated in the correct location in the EA, per the errata.

Measure Device Location	Course Number	Max. & Min. Distance of Measuring Device from Course (ft.)	dB measured for 5 minutes with no motorcycles	dB measured for 5 minutes with motorcycles	Maximum dB with no motorcycles	Maximum dB with motorcycles
A	1	1,100 – 5,000	34	35	49	55
B	1	1,900 – 4,000	36	37	57	53
B	2	2,500 – 4,000	47	40	62	55
C	1	400 – ~1 mile	43	46	57	67

Comment 8y:

In regards to EA pages 18 and 19, Table 9, noise levels of common sounds, it needs to be pointed out that people in a quiet residential area would perceive a 10db increase in sound level if rainfall began. A 10db increase would be perceived as being “Twice as loud” (A Guide to Noise Control in Minnesota, 2008, and hearingaidknow.com). Using references provided, a whisper would be perceived as being twice as loud as rustling leaves or a mosquito (soundbytes.com). Refrigerator humming would be perceived as being twice as loud as a whisper (National Institute of Deafness and Other Communication Disorders). Even a 5db increase would be “noticeable” or “clearly noticeable”. The EA page 19, states, “Therefore, the sound level of OHVs would be expected slightly higher (<10db, less than a whisper) than the surrounding forest at this distance.” A change of <10db louder would be clearly noticeable to about twice as loud over pre-existing background level, and OHV noise can be heard even if its sound is below background level even farther away. Note that a quiet residential area, at 40db, compared to rustling leaves, a more forest-like area, at 20db, would be 20db louder, or about four times as loud.

Response 8y

The commenter is correct that references do accurately state that, due to the logarithmic scale used for measuring dBA, a 10 dBA increase means that the sound is approximately twice as loud. See the excerpt below from the reference provided by the commenter:

Excerpt - A Guide to Noise Control in Minnesota, 2008 (Minnesota Pollution Control Agency)

This describes how the human hears differences between decibels since they are measured on a logarithmic scale. The following table is relevant:

Change in decibel level and perceived change in loudness

+/- 1 dBA	Not Noticeable
+/- 3 dBA	Threshold of Perception
+/- 5 dBA	Noticeable Change
+/- 10 dBA	Twice(half) as loud
+/- 20 dBA	Four times (one fourth) as loud

USDA Forest Service (1975) shows that at distances of 50 feet, the noise levels were 9 dBA over the ambient environment (about twice as loud). At distances of 100 feet this drops to an average of 3 dBA over the background environment – this increase is at the threshold of perception in difference (above). Beyond 100 feet the difference in noise levels is not measurable. The statement in the EA will be corrected with an Errata to state that “The sound levels of OHVs would be less than 10 dBA higher (twice as loud) than the surrounding forest in close proximity to the trails (within 100 feet), and only slightly higher at greater distances.”

See also Response 8x.

Comment 8z:

An OHV with 99db sound level would meet Michigan Standards and be precisely legal. If each OHV is producing an identical 99db sound level, two OHVs would produce 102db, three OHVs would produce 104db (ESA/211742 Fundamentals of Acoustics and Vibration). This would be perfectly legal, but the noise impact on non-motorized users increases with increases of OHVs present. Therefore, where OHVs congregate (such as OML1 and 2 road and trail intersections, turnarounds, parking lots, stop signs), their noise would travel farther.

Response 8z

The commenter is correct that directly in the vicinity of the OHVs, if evaluated as point sources of noise, the dBA measures would increase as described (see Fundamentals of Acoustics and Vibration - excerpted from Leigh Pemanente Quarry Reclamation Plan Amendment, Draft Environmental Impact Report). However, this is irrelevant since the EA conclusion of distances the OHVs would be detected was based on studies that evaluated groups of OHVs and motorcycles, not just a single vehicle. In addition, the 1975 study found that when traffic volume was doubled (from 96 to 178 vehicles per hour) the volume increased by only 2 to 3 dBAs which would be barely measureable. The study concluded that OHVs in groups do not operate as single point source because of their close proximity (USDA Forest Service 1975).

Note that state regulations apply to single vehicles and the noise emissions are measured 20 inches from the tailpipe.

Comment 8aa:

The “Red Top ATV Loop Trail Survey”, (same, final report, April 2008), was conducted by the oversight committee with the objective of gaining information related to the perceived noise impacts ATV trails, and specifically, impacts associated with living near an existing ATV trail. The target group of property owners received mailed surveys, the responses were coded to identify distance from the trail, and individual responses were not identified and remained anonymous. The three distance zones were: <1 mile, 1-2 miles, and 2-3 miles. A nearly equal response from each zone was received. Overall, 53% indicated “No Noise Impacts” (Which is not the same as not hearing any ATV noise). None the less, 47% reported audible/heard noise in the following impact categories: very tolerable, tolerable, neither, intolerable, and very intolerable. 47%, all three distance zones, up to three miles from the trail, heard ATV noise.

Overall, 70% of respondents were ATV users (recreation, access to public land, farm and yardwork). It is reasonable to assume that ATV users have a higher tolerance for ATV noise. Kariel, 1990, page 143, states “There was a close relationship between ownership of certain noise-producing items and annoyance from their sound. Pet owners like the sound of pets, and chainsaw owners are less annoyed by their noise than non-owners.” And on page 147 is stated, “Sounds which are interpreted as aiding or benefiting an activity are evaluated positively, while those deemed as interfering with or being detrimental to an activity or as being harmful are considered to be displeasing or annoying.” Harrison, Clark, and Stankey, 1980, page 8 states, “Since the “message” a sound carries is important in determining how acceptable it is in a given recreation opportunity, one must distinguish between those sounds that probably would be perceived as appropriate (because they are the sounds of other, similarly behaving recreationists)

and thus likely to be accepted, and those sounds that would probably be considered as annoying (because they connote dissimilar behavior on the part of others).”

Respondents’ impacts took place at their residences, where expectations of noise (neighbors, roads) and toleration of noise is higher, and background sound levels are higher, than at relatively undeveloped areas where they would go while seeking natural experiences. Yankoviak, 2005, page 40, states, “The annoyance resulting from ORV noise differs with the area and resultant visitor expectations. Harrison, Clark, and Stankey (1980) suggest that tolerance of vehicle noise will be greater in more urban areas, and lessen as visitors move into less developed areas where they increasingly seek natural experiences.”

Survey results indicated that noise impacts are likely to occur during the summer, on the weekends, and in the afternoons. This is reasonable. More part-time residents were there to hear the noise (summer, weekend). More residents were outdoors, and their neighbors (summer weather, repairs, chores, yardwork, cooking and eating). Also note that during the summer, vegetation has grown and leaf-on conditions exist.

Response 8aa

The “Red Top ATV Loop Trail Survey” documents the methodology and results of a survey completed to help understand the perceived impact noise from ATV trails. The trail evaluated was part of a large network of trails meant to connect popular recreation destinations. A survey was mailed to people living near the trail (within 3 miles of the trail). The survey focused only on perceived impacts of the trail and found that the majority of neighbors in all distance zones (within 1 mile, 1-2 miles, or 2-3 miles) found it either had no impact, was tolerable, or was very tolerable. Some respondents to the survey did note that they could hear the ATV use on the loop trail between 2-3 miles away (27%, or about 11 individuals responded that there was some noise impact). Of these very few (2 respondents) noted that the noise was intolerable or very intolerable.

It concludes that “Given the number of survey respondents that indicated no noise impact from the trail, there is reason to believe that the social impacts of noise from the Red Top ATV Loop trail are not in excess of tolerable levels for current residents.”

A few important differences between this study and the current proposal follow. This is a case study on the effects of a loop trail on residential settings. The current project is a linear trail (where we can assume noise will be less concentrated in one area) and we are evaluating impacts to a forested recreational setting. In addition, we do not know the details of the topography and setting which may evaluated the noise heard. Finally, the study relies on self-reporting of what’s heard, while other studies used in the EA rely on measurements. The studies applied in the EA are more relevant than this study for the current project.

It’s important to note that the EA does not claim that no noise will be heard beyond 0.5 miles. Instead the analysis is based on relevant literature that states less than 5% of the noise from OHVs could be heard beyond 0.5 miles from the source in a forested recreational setting.

We acknowledge that the impact of OHV noise depends on both the sound heard (loudness) and the perception/attitude of the listener. Please refer to response 8n.

Comment 8bb:

Bottom line is that ATV noise can be heard from about three miles away. The spatial effects analysis boundary was underestimated, OHV noise can be heard and impact non-motorized users at a far greater distance, and Issue 1 must be reanalyzed.

Response 8bb

See also response 8x and 8aa.

The analysis boundary area for noise impacts was as defined in the Analysis Framework and the EA was developed based on the findings of the referenced relevant studies.

It should be noted that, as the commenter has shared with us, several studies are available that discuss user conflict and disturbance of non-motorized experience (Harrison, Clark, and Stankey 1980, Kariel 1990, Yankoviak 2005, Bleich 1988, WDNR SCORP 2005). However, those studies do not provide a generally applicable distance at which OHV or other vehicle noise can be heard by forest visitors. One study provided (Harrison, Clark, and Stankey 1980), does provide a method for predicting audible distances and noise effects, however, this level of detail is not necessary here. The EA relies on studies that focus on where effects will be most evident (and thus have potential for greater impacts). The EA relied appropriately on the literature that was available to identify an indicator measure and assumptions for analysis.

Comment 8cc:

Non-supporting public input does not delay implementation of good planning; It can prevent implementation of bad planning. To create cornerstone documentation unavailability, and then successfully delay disclosure, precludes public participation.

Response 8cc

See Response 8a.

Comment 8dd:

I urge the decision in favor of Alternative 1. The plan for Alternative 2 is unacceptable. The plan for Alternative 3 needs substantial improvement to be unappealing.

Response 8dd

Comment noted.

Comment 9 – Northwood Alliance Inc., Joe Hovel

The Northwood Alliance Inc. (NWA) is a non-profit, member orientated, conservation organization concerned about the region's forests, water and resource damage caused by ATV/OHV use within the Ottawa National Forest.

Alternative 3, as detailed in the Environmental Assessment, does address some of our concerns outlined in our May 2012 comments. However, because some of our most serious issues still have not been fully addressed, we must support Alternative 1 the "No Action Alternative" at this time.

Response
Comment noted.

Comment 9a:

The EA contains two issues that need further clarification:

Page 26 contains a typographical error - FR 2900 should be FR 2009 (this was brought to the attention of FS staff through an email).

Response 9a

An email was sent to Nancy Warren on 9/27/2012 explaining that on page 26 the use of 2900 as the FR number was a typographical error. The road is correctly identified as FR2009 elsewhere in the EA document.

Comment 9b:

The second issue is more confusing. The definition of OHV on Page 1 excludes off-road motorcycles, likewise, the definition of UTVs on Page 8 also excludes off road motorcycles, yet on Page 12, it states "When the OML 3 and 4 routes are being used for commercial log hauling, or other resource management projects involving heavy equipment use, provide signage or restrict the use of OHV's, UTVs and *off-road motorcycles*. Table 1 compares the proposed actions, yet it is not clear from the EA, where off-road motorcycles may be ridden and the impacts of their use have not been addressed or evaluated in this EA.

Response 9b

See also Response 8b.

Comment 9c:

Need for Environmental Impact Statement

The direct, indirect and cumulative impacts of both Alternative 2 and Alternative 3 as well as the positive and negative environmental effects of the proposed action should be documented in an Environmental Impact Statement. The financial plan, including the source of secured funding, is not discussed in the EA. Rather, the off-highway vehicle monitoring strategy specifically states that the monitoring methods "will all be implemented as funding and personnel resources allow."

An EIS would also include a cost analysis for each alternative, including costs to mitigate expected impacts, to determine if the proposed action is a prudent use of taxpayer dollars. We believe both the implementation of both Alternative 2 and Alternate 3 could result in significant environmental impacts requiring an EIS.

Response 9c

Forest Service NEPA regulations require that “an environmental assessment (EA) shall be prepared for proposals as described in § 220.4(a) that are not categorically excluded from documentation (§ 220.6) and for which the need of an EIS has not been determined (§ 220.5).” The Responsible Official will review the Environmental Assessment, comments received, and the Response to Comments and will then make a determination of whether to prepare an EIS or to prepare a FONSI and document his decision in a Decision Notice. (See EA Section 1.5- Decision Framework, page 4 of the EA).

The source of funding for the projects maintenance, monitoring or safety design criteria could vary from funds that are appropriated to the Forest Service through the Federal Budget, funds that are collected for maintenance, repair and improvement of roads, and funds/services that the State or other partners provide for recreational motor vehicle use. Although these strategies express that these efforts in the future are linked to appropriated funding from Congress, as well as other funding mechanisms such as grants and volunteers, the Ottawa National Forest has fully funded these efforts in fiscal year 2013. In addition, the Ottawa was able to fully fund these efforts in 2012 resulting in improved signage, and the monitoring of approximately 200 miles of roads and trails in accordance with the Ottawa Monitoring Strategy, including the pre-monitoring adjacent to the proposed connector route. We have already shown our commitment to improving travel management on the Forest and will continue to do so within the appropriated and other funds available in the future.

It should be noted that an EIS does not necessarily require a cost-benefit analysis, though responsible officials should consider “including factors not related to environmental quality, which are likely to be relevant and important to a decision” (40 CFR 1502.23). The commenter notes that we should determine whether or not the proposal is a prudent use of tax dollars. Though NEPA does not require cost analysis (as it is focused on environmental impacts), the Responsible Official does make these considerations when designing the proposed action and will consider this when making his Decision. The proposed action was proposed with consideration of the costs and the benefits of the proposal (recreation opportunities provided) were considered to outweigh the costs.

Comment 9d:

Issue 1 – Noise Impacts

We question the conclusion reached (page 20) that, “there are no additional reasonably foreseeable actions that would increase the vehicle noise within the project area.” The FS acknowledges that the frequency of noise may increase but then concludes “not necessarily the level of noise”. This is illogical. Alternatives 2 and 3 both provide addition miles of forest roads open to OHV travel so we can expect motor vehicle and OHV noise and frequency to increase

and the level of noise will also increase as the opening of these roads will encourage “group” riding.

Response 9d

The EA does conclude that along the Forest Roads proposed for opening there may be a “slighted increase in the noise level and frequency within 0.5 miles of each side of the proposed routes” (emphasis added) (EA page 20). However, it also concludes that adjacent to county roads the “frequency of noise (not necessarily the level of noise) may increase.” This conclusion was reached because these County Roads, which are not part of the proposed action, are already open to OHVs (and group riding). With the addition of a connection all the way to the State Grade to the north, the Proposed Action may increase the OHV volume of use of these county roads (see Analysis Assumptions on EA page 15) and thus the frequency of noise. Refer also to comment 8z.

Comment 9e:

Those who visit backcountry areas to engage in non-motorized activities will be more sensitive to motor vehicle noise than those recreating at busy campgrounds or trailheads. Activities and noise levels that are acceptable in developed or urban areas commonly are less acceptable to non-motorized recreational users in a natural setting (Stokowski & LaPointe 2000 Unmanaged Motorized Recreation) Attachment 1.

Response 9e

See Response 8n.

Notes on relevance of reference provided:

Stokowski & LaPointe 2000 Unmanaged Motorized Recreation

The commenter has referenced us to a citation to an annotated bibliography on the effects of OHVs on the environment (cited as Stokowski & LaPointe 2000) provided within a National Level Forest Service position paper titled “Unmanaged Motorized Recreation.” Unmanaged Motorized Recreation was identified as one of the “Four Threats to the Health of the Nation’s Forests and Grasslands”. At the National Level the Forest Service developed strategies for addressing the ‘[four threats](#)’. Part of the strategy to address unmanaged recreation included the publication of the Travel Management Rule in 2005. This position paper, published prior to the TMR, applies to the Forest Service at a national level. Though some concepts in this paper do apply specifically to the Ottawa National Forest, since our compliance with the TMR, many of these issues highlighted have been addressed.

The commenter quoted the following from the “Unmanaged Recreation” publication: “Activities and noise levels that are acceptable in developed or urban areas commonly are less acceptable to non-motorized recreational users in a natural setting.” We have acknowledged this assumption in the analysis provided in the EA and in the Response to comments.

The commenter did not provide any specific references to the Stokowski & LaPointe annotated bibliography and did not provide any specific applications of this reference to the Proposed Action.

Comment 9f:

Some wildlife species may be affected by excessive noise and disturbances. Displacement during winter depletes energy reserves need for survival and reproduction by mammals and birds (Impacts of Noise on Wildlife) Attachment 2. Attachment 3 (BBC News) explains that "Quiet places are especially vulnerable to noise intrusions, because even distant sources can have an impact."

Response 9f

As documented in our Forest Plan project file, there are few areas of the Ottawa, outside of Federally-designated Wilderness Areas, that are not currently roaded and open to motorized vehicle travel. About 82% of the Ottawa is in the roaded natural category of the Recreational Opportunity Spectrum. Trails within MA 6.1 are restricted to non-motorized use, but even there, state and county roads and higher level Forest Service roads (e.g. OML3 & 4) are open to motorized vehicles, and cannot be considered "quiet places". During Plan revision, the Ottawa did an analysis of distances from roads and trails of varying OMLs. We found that very few areas of the Ottawa are more than 1 mile from a road or trail open to motor vehicles. In fact, 80% of the Ottawa is within ¼ mile of an OML 1-5 road, or a federal state or county highway (see page B-1 of Ottawa Forest Plan's FEIS). The proposed connector routes all occur within the roaded natural setting and do not transect any of the few "quiet places" that exist on the Ottawa.

The proposed connector routes are in parts of the Forest that are already open to motorized vehicle traffic. The vast majority of the connector routes would be on well-established roads that are already open to passenger vehicle traffic, and even occasional hauling by commercial vehicles such as log trucks (see EA and Maps). These corridors are not quiet places at this time. Additional traffic on those busy roads, in the form of OHVs, would represent a small incremental increase in traffic and noise in areas where wildlife species are accustomed to such disturbances. Thus, disturbance would not be expected to be a factor for most wildlife species. The Biological Evaluation for the OHV project determined that there may be impacts to individuals of certain Sensitive species (e.g. spruce grouse) from adding OHVs to the list of permitted motorized vehicles, but no detectable effects to populations of any species are anticipated.

Regarding winter disturbances; refer to Response 8c regarding seasonal use of the proposed routes. Some limited winter use by OHVs may occur when snow does not limit their use. Furthermore, it should be noted that these routes are currently open to snowmobile traffic during the winter. A few sections of the proposed route near Lake Ste. Kathryn (.5 miles) and the Sidnaw – Bergland grade (< 3 miles) are part of a designated snowmobile trail. Snowmobiles are not allowed if/when roads are plowed for logging activities for safety reasons. When plowed, logging trucks and pickup traffic is frequent, and probably causes more winter disturbance of wildlife than occasional snowmobiles.

Some limited winter use by OHVs may occur when snow depth is not limited.

Many wildlife species are more vulnerable in winter. For that reason, many Ottawa species migrate away for winter, and many others hibernate during the winter. Year-round resident birds and mammals are the species groups that could be impacted during the Ottawa's winters. Sensitive species considered in this analysis include wolf, spruce grouse, bald eagle and black-backed woodpecker. Management Indicator Species considered include both American marten and ruffed grouse. For the most part, these species can acclimate quickly to human activities, and learn to either avoid a road corridor, or in the case of wolves, use the packed roadway as travel corridors. The OML 3 & 4 roads considered in this analysis have been open to cars, pickups and commercial vehicle uses for many years, including in the winter until snow conditions prevent passage. Allowing OHVs to use the OML 3 and 4 roads represents a small amount of additional traffic. Given the existing use levels, we do not expect that the small incremental increase in traffic posed by OHVs would be a critical determinant in survival for our resident mammals and birds. The 'may impact individuals' determinations reached in the BE are still the valid determinations, even after considering the potential winter use by OHVs. As well, expected effects to MIS are largely the same as documented in the MIS Report, even after considering the small incremental increase in traffic posed by OHVs.

Comment 9g:

We are concerned that the EA did not address OHV noise at night and believe the impact of noise must be documented, analyzed and evaluated through an EIS.

Response 9g

See also Response 8f and 8g.

Despite the limited amount of nighttime use expected, the analysis of effects of noise on non-motorized users presented in the EA (page 17-20), though not explicitly stated, was intended to evaluate noise impacts to non-motorized users at any time, day or night. There are several types of non-motorized users specifically mentioned which would be most affected at night (developed campgrounds and primitive campers, specifically). Effects to these user groups are evaluated in the EA.

As described above, the vast majority of our proposed connector routes are already open to passenger vehicles and commercial hauling. Currently, there are no restrictions on night operations of these vehicle types on these roads. Therefore, wildlife along these roads have already acclimated to a level of night noises and lights from motorized vehicles. The degree of additive disturbances posed by OHVs using the proposed routes at night cannot be determined at this time. However, our expectation is the amount of night time OHV traffic will be relatively low compared to daytime use.

The BE for this project addressed disturbance issues (including noise) from adding OHVs to the mix of motorized vehicles using the proposed routes. Night OHV noises are not specifically mentioned in the BE, but the noise analysis was general and did not exclude night OHV noise. Bats, for example, are nocturnal foragers, and preferentially forage

above road corridors through forested environments. As stated in the BE our 3 Sensitive bats would be disturbed by OHV traffic, due to noise, lights and dust; as a result, we determined that a May Impact Individuals determination would be appropriate. After consideration of night OHV noises, we stand behind our determination of MII for the group of 3 Sensitive bats; effects to populations of these Sensitive bats are not expected. None of the other Sensitive species are predominantly nocturnal, though some, like wolf, are active at night as well as day. We do not anticipate that night use of OHVs along proposed routes would affect other Sensitive species in a manner demonstrably different than what was already disclosed in the BE and the EA.

See Response 9c regarding the need for an EIS.

Comment 9h:

Issue 2 – Non-Native Invasive Plants

We have raised this issue several times over the past few years, and although the EA acknowledges that the addition of OHV's to the proposed routes would increase the risk of NNIP introduction and spread along the routes and into adjacent habitats, the author fails to recognize that OHV riders will not be confined to just the roads where infestations of non-native invasive species exist. Riders travel back and forth between county and forested roads and forested trails including unauthorized trails. They travel among a variety of land cover types and because they transport soil, they disseminate invasive seeds and earthworm eggs or cocoons on their tires and underbodies into a wide variety of more remote and ecologically sensitive areas.

Response 9h

The EA does acknowledge that OHV riders will not be confined to just the roads where infestations exist. The discussion of Issue 2 on page 21 the EA considers that OHVs can spread seeds from infestations already occurring along the routes, as well as bring in new seeds from elsewhere. The paragraph further acknowledges that "OHVs are considered a particular risk for spreading NNIP because they may often travel on road shoulders or other vegetated areas, where they are more likely to pick up NNIP seeds."

Northwood Alliance raises the topic of OHVs transporting earthworm eggs and cocoons, as they did in their 2011 appeal of the Ottawa National Forest Off-Highway Vehicle Connector Routes Project. Although not discussed in the Environmental Assessment, earthworms were considered in the September 2012 Analysis Preparation Framework for the Eastern OHV Connector Route Project (Project Record).

The introduction of earthworms into new habitats is facilitated by human activity, such as road construction, release of fishing bait, relocation of fill or horticultural materials, or when attached to vehicles (Bohlen et al. 2004; Hale 2008). Earthworm eggs and cocoons can be picked up in soil and transported on vehicle tires and vehicle underbodies (Hale 2008). Surveys for earthworms on the ONF have found them to be widespread across the forest, especially in roaded areas (Dunlap and Trull 2011). The earthworms present throughout the project area likely were introduced during road construction and the following years of vehicle use. What kinds of vehicles use the roads now does not matter,

since the roads and the earthworms are already there. The addition of OHVs would not be expected to have any effect on the distribution of earthworms along the routes.

References

Dunlap, Sean and Susan Trull. 2011. Exotic Earthworms on the Ottawa National Forest Summary of findings from earthworm and botany surveys, 2002-2011. Ironwood, MI. www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5377382.pdf

Hale, Cindy. 2008. Evidence for human-mediated dispersal of exotic earthworms: support for exploring strategies to limit further spread. *Molecular Ecology* 17, 1165–1169

US Forest Service. 2012. Stewardship End Result Contracting. Web site: www.fs.fed.us/restoration/Stewardship_Contracting/index.shtml

Comment 9i:

The EA only addresses reactive measures, yet gives no indication on how the efforts will be funded. The EA fails to acknowledge that an objective of the Forest Plan is to limit the spread of non-native invasive species and clearly the connector routes will contribute to the spread of non-native invasive plants.

Response 9i:

Northwood Alliance asked how reactive measures to address invasive plant infestations would be funded. Every year since 1999, the Ottawa National Forest has received funding in our “National Forest Vegetation and Watershed” (NFVW) program, and a corresponding acre target to control invasive plant infestations. From 2009 to 2012 we treated over one thousand acres of invasive plant infestations each year. Other sources of funding include stewardship contracts and Knutson–Vandenberg funding from timber sales (Forest Service Handbook FSH 6509.11g). The new Ottawa NF Off-Highway Vehicle Monitoring Strategy will help us detect resource impacts, including infestations of invasive plants, which can then be included in treatment plans as part of the Forest NNIP Control Project.

Northwood Alliance reminds us that a goal [referred to by NWA as an objective] of the Forest Plan is to limit the spread of non-native invasive species (Through implementation of appropriate prevention, control and eradication measures for non-native invasive species, maintain intact ecosystems to prevent the displacement, decreased viability, or extirpation of native species. – Goal 8, page 2-4 Forest Plan). The EA acknowledges that designation of new connector routes would indirectly lead to the displacement of native species and the spread of non-native invasive plants. However, goals are different from objectives, guidelines, and standards (Forest Plan, pp. 2-1-2-2). Goals are considered when developing projects and are monitored at the Forestwide scale (see Monitoring and Evaluation Reports). In addition, the plan also includes Guidelines (pages 2-12 and 2-13) to help prevent the spread of non-native invasive species, and these were referenced in the Analysis Preparation Framework. The guidelines, as well as the Forest Plan goals and objectives, were considered in the creation of the proposed action and environmental

analysis. We have reduced impacts to native plant communities by keeping the majority of routes along existing roads and trails, which are already open to motor vehicles. In addition, we've proposed design criteria to limit the spread of NNIP from maintenance, construction and reconstruction. As discussed on page 23 of the EA, the Forest Plan Environmental Impact Statement acknowledges that allowing more OHV access will contribute to the spread of non-native invasive plants. The conclusions in the EA also agree that designation of the connector routes would indirectly contribute to the spread of non-native invasive plants. Our effects analysis does not, however, show that the connector routes are inconsistent with the preservation of intact native plant communities.

Comment 9j:

The direct, indirect and cumulative impacts caused by the spread of non-native invasive species must be evaluated through an EIS.

Response 9j

See Response 9c regarding the need for an EIS.

Comment 9k:

Wild and Scenic River

The EA acknowledges that the amount of sediment and dust entering the East Branch Ontonagon River WSR may slightly increase with the implementation of the proposed action. Yet concludes the increase “would be very small and water quality changes would be imperceptible” and water quality would remain in “good to excellent condition”. There is purely speculative and this issue needs to be examined more thoroughly through an EIS.

Response 9k

This conclusion is based by one of the Forest's trained and experienced hydrologist with knowledge of the area and past nearby water quality analysis (MDEQ 2003, MDEQ 2004, MDEQ 2008) at or downstream of county roads that are open to OHV use and with good to excellent ratings. Water quality was tested for Bush Creek at Iron County Road 657 with acceptable to excellent ratings and non-impaired status. Water quality at the North Branch Paint WSR, downstream of the Iron County 657 and Winslow Lake county road crossings, was rated excellent with non-impaired status. Spargo Creek at Houghton County Road D161 (also known as Lake Thirteen Road) was rated good to excellent. Stony Creek at Houghton D161 only received a site visit in 2003 since past water quality met Michigan standards and little activity had occurred that would adversely impact water quality. Habitat conditions were considered superb. Golden Creek had acceptable water quality near the Ponozzo Road crossing. The conclusion that water quality changes would be imperceptible was made because of the knowledge that water quality is so good nearby where OHVs currently use the county roads. In addition, the State water quality monitoring program is ongoing and the ONF reviews their reports as they become available to incorporate proactive and adaptive management as needed.

Michigan DEQ. 2003. A biological survey of the Brule, paint, and Michigamme River

watersheds, Iron and Marquette counties, June 17-23, 2002 and July 14, 2002. Michigan Dept. of Environmental Quality, Water Division, Lansing, MI.

Michigan DEQ. 2004. A biological survey of the Ontonagon River watershed: Ontonagon, Gogebic, and Houghton counties, Michigan, June 2003. Michigan Dept. of Environmental Quality, Water Division, Lansing, MI.

Michigan DEQ. 2008. A biological survey of the Menominee River watershed including the Iron, Brule, Paint, Michigamme, Sturgeon, and Little Cedar Rivers Subwatersheds: Baraga, Dickinson, Iron, Marquette, and Menominee counties, Michigan, June 2007. Michigan Dept. of Environmental Quality, Water Bureau, Lansing, MI.

Michigan DEQ. 2003. A biological survey of the Brule, paint, and Michigamme River watersheds, Iron and Marquette counties, June 17-23, 2002 and July 14, 2002. Michigan Dept. of Environmental Quality, Water Division, Lansing, MI.

Michigan DEQ. 2004. A biological survey of the Ontonagon River watershed: Ontonagon, Gogebic, and Houghton counties, Michigan, June 2003. Michigan Dept. of Environmental Quality, Water Division, Lansing, MI.

Michigan DEQ. 2008. A biological survey of the Menominee River watershed including the Iron, Brule, Paint, Michigamme, Sturgeon, and Little Cedar Rivers Subwatersheds: Baraga, Dickinson, Iron, Marquette, and Menominee counties, Michigan, June 2007. Michigan Dept. of Environmental Quality, Water Bureau, Lansing, MI.

Comment 9I:

Safety

The engineer report indicates that portions of the existing forest road are not adequate to safely handle dual use from ATVs and street-legal vehicles. In 2011 there were 44 off-road/all-terrain vehicle crashes on U.P. public roadways resulting in injury or at least \$1000 in property damages. There were two fatal crashes. The cost of reconstructing portions of the road to safely accommodate ATV use must be reflected in this proposal, to show its true costs including the direct costs as well as environmental costs and this should take place prior to opening the road to ATV use.

Response 9I

Crash History is a consideration factor for estimating Crash Probability for the Motorized Mixed Use Analysis and the Michigan State Police report does indicate the number of crashes for the Upper Peninsula as noted in the comment. The crash history most considered for the analysis however is for the individual subject road and includes any available records from Law Enforcement, local knowledge, and field evidence such as skid marks, broken glass, fenders, damaged road appurtenances, or scarred trees.

The strategic approach as outlined in the reconstruction tables for FR2127 & FR3500 and the Summary of Dual-Use Analysis, Recommendations, and Estimated Costs, account for the variability in levels of crash probability and propose to address the High risk segments immediately upon decision and the moderate and low risk segments to be corrected in phases encompassing a five year plan.

The individual Motorized Mixed Use Analysis reports and the Summary do provide estimated costs associated with completing the recommended work. Additional information has been added to the Summary, totaling the estimated costs for each year.

Comment 9m:

Enforcement

The EA still does not adequately address enforcement and appears to minimize the issue of unauthorized trails. We strongly disagree with the assessment that “unauthorized uses are not part of the proposal, but rather are private, individual actions outside the control of the Forest Service.”

The FS acknowledged it does not have complete data regarding the amount and location of illegal use that may be occurring within the National Forest. But then concludes any assumptions that unauthorized use would occur adjacent to the proposed routes would be speculative. It is as though the FS is choosing to ignore the fact that illegal use is occurring throughout the Ottawa.

Response 9m

The EA did not analyze the effects of unauthorized OHV use as part of the proposal (page 16 Analysis Framework and Assumptions), but did consider unauthorized use as part of the Affected Environment. Unauthorized use as a result of the proposal is speculative. The OHV Monitoring Strategy is designed to identify instances of unauthorized use and resource damage and to implement actions that prevent it from continuing or occurring. The initial monitoring completed in the summer of 2012 found there is existing unauthorized use on some of the system roads and unclassified routes adjacent to the proposed routes. A portion of this unauthorized use may also be causing resource damage (rutting, water quality impacts, etc.). As a result of these findings, the Forest is planning to take actions to install signs, closure devices, and decommission roads. Applications for federal funds for the decommissioning efforts have already been completed. New signage that will supplement the MVUM and clearly indicate which uses are allowed on the routes has been purchased and is currently being distributed to employees and volunteers to start adding to signs throughout the Forest. These signs have already been put in place on the OML 1 and 2 roads adjacent to the proposed connector routes. The post-opening monitoring will help us determine if the proposed routes are resulting in increased unauthorized use and we will use adaptive management to address issues as they are discovered (see Chapter 4 of the EA). It is anticipated that, with the above mitigations, unauthorized use will decrease.

Comment 9n:

The MVUM is not being enforced and resource damage occurs near many designated trails because riders continually leave the trail. This is especially true during bear and deer seasons when hunters place bait in the woods. Evidence of riders going around gates, over berms and on closed trails can be seen with just a casual ride through the forest.

Response 9n

The Forest Service Law Enforcement Officers (LEOs) are actively patrolling and issuing warnings and notices of violation for MVUM violations. The 2012 Ottawa Law Enforcement Agenda (can be found in the Project File) shows that in Fiscal Year 2011 (October 2010-September 2011) LEOs and Forest Protection Officers (FPOs) have prepared 245 incident reports related to roads/trails and OHVs and issued 17 violation notices roads/trails and OHVs. These values do not include all of the contacts staff, FPOs and LEOs make in educating the public about the MVUM and appropriate use of Forest System Roads and Trails. Much of the work of the LEOs continues to be this educational work, as violation notices are not always the effective enforcement tool.

Travel Management issues is one of 5 land management priorities that the LEOs are focused on in 2012. As part of that work they contributed their experience and information to an interdisciplinary strategy team that developed a new Travel Management Rule Strategy for the Ottawa National Forest in the spring of 2012. The TMR Strategy was aimed to recognize and address the issues we have had with implementation of the MVUM and in helping forest visitors understand what is required. Two major components of the TMR Strategy are to improve the signage on the Forest and to correct errors on the MVUM map where it does not match conditions on the ground. Signs indicating appropriate or prohibited motor vehicle uses will be used to supplement the MVUM map. In 2013 implementation of the TMR Strategy is intended to be focused on the proposed routes should the Responsible Official decide to change designations.

The OHV Monitoring Strategy (discussed above, Chapter 4 of the EA) is also aimed to contribute to improved implementation and enforcement of the MVUM. The monitoring strategy aims to identify and address resource damage that may be occurring from unauthorized use such as those described above..

It should be noted that in many cases on Ottawa National Forest, motor vehicles 50 inches or less are allowed to go around gates and berms where the MVUM designates the routes for such uses (these are referred to as Special Designation Routes in the index for the MVUM). In addition, there are many instances where individuals are authorized Special Use Permits to use Forest Service Roads to access private land – often these routes have gates or berms as well. Not all signs of use behind gates and berms are evidence of unauthorized use.

Comment 9o:

1- The monitoring and adaptive management plan is useless without adequate staffing and funding. Before any additional trails are open to OHV traffic, the monitoring plan must be fully

funded and fully staffed. Further, there needs to be funding available to repair the damage caused by unauthorized use.

A primary responsibility of the National Forests is to protect ecosystem integrity, including the diversity of native plants and animals on National Forest System lands. Any proposed project that may threaten ecosystem integrity (as this one does), should be rejected, unless it is assured that funding levels will be adequate to protect the ecosystem from irreparable damage. Since funding for monitoring is not assured in this case (if anything, will probably decrease from existing levels in the near future), the Ottawa should not be adding new ATV routes that could very well jeopardize ecosystem integrity.

The Northwood Alliance Inc. is disappointed that the Environmental Assessment failed to adequately address our concerns raised in our May 2012 comments, namely, the lack of enforcement of unauthorized use, funding and the evitable spread of non-native invasive species.

Response 9o: Refer to 9c related to funding.

The commenters did not provide specific evidence that the proposed action threatens ecosystem integrity or will create irreparable damage to the ecosystem. The EA and responses to previous comments document that the Interdisciplinary Team did not reach these conclusion for the resources analyzed.

The Ottawa NF Forest Plant Final Environmental Impact Statement discusses native plants on pages 3-97 to 3-105. The comment here does not explain how the proposed project may harm ecosystem integrity or native plants, although earlier comments concerned the spread of non-native invasive plants. Please refer to Issue 2 of the EA (pages 20 to 23) and the earlier response to comments for more information on that topic.

Comment 9p:

It must be established that the OHV connector trails are both economically and environmentally justified. We believe the proposed actions will result in significant environmental impacts and that an Environmental Impact Statement is necessary.

Response 9p

See Response 9c which explains that an EIS is not necessary. An economic cost benefit analysis to determine whether or not its economically justified is also not required. The environmental analysis concludes that the project impacts are not major.

Comment 10 – Allan Smolinski

Following are comments on documentation provided in response to my FOIA request. To save time, many are in question format. The topics are interconnected; so are my comments.

Comment 10a:

Expanding on my previous comments, page 7, Engineering reports for Forest Roads 1100, 1460, 1300, 2009, 3500, 2127, 3270, and 3660 all contain a “Conclusion” that states that allowing mixed use on each road may be acceptable if the “Mitigation Measures” are implemented prior to designation. On the “5-year Schedule”, for FR1300, incomprehensible wording is provided in the “Needs” column. The EA, page 9, Table 1, for FR1300 in the “Other Actions” column, provides “Maintenance and mixed use signing”. The engineering report conclusion, states, “Motorized mixed use is not recommended in the segment where useable roadway is less than 18 feet.” Does “Mitigation measures” include the widening of FR1300 to 18 feet prior to designation?

Neither the 5-year schedule nor Table 1, EA page 9, include “Other mitigation measures” as provided in FR1100 and FR1460 engineering reports. Do “mitigation measures” include these “other mitigation measures” (to be completed prior to designation)?

Response 10a

Mitigation measures, design criteria, and dual use recommendations are synonymous. The “other actions” in table 1 of the EA refers to these recommendations. In addition to these ‘other actions’, the Design Criteria listed on page 11-12 of the EA would be applied to all dual use routes. See also Response 10c.

Comment 10b:

Wording on EA page 27, under 3.6.4 Watersheds and Soil Resources, implies that specialists’ analysis included completion of rehabilitation of roadside ditches and shoulders and spot surfacing after ditching prior to designation. Disclose which roadwork was anticipated to be completed prior to designation in the conclusions that are included in the soil resource and water resource specialists’ reports.

Response 10b

The EA on page 27 states that “*the Transportation Dual Use Analysis indicates there would be surfacing and ditch work in some locations, which would reduce sediment potential and it would be unlikely that road should use would consistently occur near water resources...*” The Summary of Motorized Mixed Use Analysis Recommendations, Estimated Costs, and 5 year Reconstruction Strategy (Appendix 4 to the DN/FONSI) indicates where reconstruction activities would occur prior to opening the routes to dual use. The Reconstruction Strategy was created for reducing safety concerns, and has the additional benefit to also reduce the already minimal soil and water impacts resulting from increased motor vehicle use on the proposed routes.

Comment 10c:

Unreasonably problematic would the opening/designation of random unconnected Forest Roads or segments of Forest Roads. No map for the connector’s north half was provided. The map provided indicates that “Phases” are involved. Part of FR3500 and part of FR2127 are “Phase 1” and parts are “Phase 2”, and FR3600 and FR2009 are color coded but no “Phase” definition is provided. Disclose all “Phases”, the composition of each “Phase”, and the relationship of the

completion of each “Phases” to the designation of each Forest Road segment, each Forest Road (8), and to the entire proposed connector.

Response 10c

The Summary of Dual Use Recommendations, Cost Estimates, and 5-year Reconstruction Strategy has been updated to more clearly show when recommendations and design criteria related to dual use safety would be implemented and is included as an Appendix to the DN/FONSI.

Some segments of road (high risk areas) proposed for dual use require reconstruction prior to designation and would not be open to OHV travel until the required recommendations have been implemented (Forest Roads 3500, 2127, and 3660). Other roads proposed for dual use require maintenance prior to designation, and would involve roadside mowing, brushing, and branch trimming as well as the installation of “Share the Roads” signs (Forest Roads 1100, 1300, 1460, 2009, and 3270).

Included in the Summary schedule mentioned above, are reconstruction prioritization plan tables for FR3500 and 2127. They detail by reconstruction priority ranking, by mile post, where high reconstruction priority segments (high risk area) would be completed after the Decision and where moderate and low priority segment reconstruction would be completed based on a Phase 1 and 2 reconstruction plan within the 5-year schedule.

The Phase 1 and Phase 2 reconstruction segments identified on the FR2127 and 3500 Reconstruction Plan Map and legend as a blue or green line respectively are associated with those mile post segments that have been ranked as “M” or “L” for moderate and low reconstruction priority segments that in their existing condition present less risk to dual use travel and can be corrected in phases encompassing a five year plan. The segments identified with these rankings include moderate curves that due to their lesser degree of curvature or radius, do not present as severe sight distance or other safety considerations, and road segments under 18’ that present lesser risk because they are straighter, flatter or otherwise present better sight distance conditions than other <18’ segments.

Mile post rankings of “H” for high reconstruction priority are areas where reconstruction will be completed by the Forest road maintenance crew after the Decision. These areas are identified on the FR2127 and 3500 Reconstruction Plan Map as a white square with bold outline and in the legend as “Curve Widening”. The high ranked reconstruction priority “Curve Widening” work will be completed prior to the Phase reconstruction plan with the exception of the northern most curve on FR3500 which will be widened during Phase 1 reconstruction.

FR2127 and FR3500 are the only proposed roads identified for Phase 1 or 2 reconstruction. Forest Roads 3600 and 2009 are identified on the FR2127 and 3500 Reconstruction Plan map as being part of the Iron-River – Sidnaw route, which includes FR2127 and FR3500, and are included for display purposes only.

Comment 10d:

Would the entire connector be “Opened” at one time/on one MVUM?

Would this occur only after all “Recommended” and “Other” mitigation measures for all 8 roads are completed?

If the entire connector is not “Opened” at one time on one MVUM, disclose the “Frequency/Duration” of targeted post-opening monitoring for each “Phase”, and/or, each forest road segment and each forest road.

Response 10d

The Summary of Motorized Mixed Use Analysis Recommendations, Estimated Costs and 5-year Reconstruction Strategy has been updated to more clearly show when recommendations and design criteria related to dual use safety would be implemented and is included as an Appendix to the DN/FONSI. All of the design criteria proposed on EA page 11 (mowing, brushing, branch trimming, road surface rehabilitation, and placement of signs) can and would be completed prior to opening the routes for OHV use. The Summary of Mixed Use Analysis Recommendations does show that branch trimming (limbing) is not required for some roads at this time and will be deferred in those areas. The 5-year Reconstruction Strategy is being used to phase in the reconstruction as needed to ensure a safe dual use experience. Some portions of roads require reconstruction prior to use (high risk areas) and would not be open to OHV travel until the required recommendations have been implemented. Other portions can be safely open prior to the recommendations being implemented. Therefore, it is anticipated that the entire route would be open after the high risk reconstruction has been completed.

As stated in the EA, post-opening monitoring will occur for at least 2 years following the designation for all vehicles on the MVUM. It is not anticipated that there will be different phases of monitoring.

See also Responses 10a, 10b, and 10c above.

Comment 10e:

Will this monitoring frequency/duration begin again, in its entirety, when the entire connector is opened/designated?

The “OHV Monitoring Strategy” referred to the 2009 and 2010 M&E reports. On-line viewing lead me to the 2011 M&E report, which led me to the ONF Monitoring Guide 2007 (“Who” will do the monitoring). According to the strategy, all/any field going personnel will be enabled to report unauthorized OHV use via the road/trail monitoring form. Are all field employees trained to recognize all resource impacts?

Do resource specialists “follow-up” on these initial reports with their own observations and reports?

If new or continued unauthorized use occurs at a reported location, does the process start over?
Does the duration “clock” reset?

Response 10g

Field-going employees received training in a series of meetings in the spring of 2012. Resource impacts that are identified are further reviewed by resources specialists as warranted to determine what management actions are appropriate (if temporary closures are needed, if further enforcement of existing closures should be implemented, or if the road can be repaired).

It is unclear what the commenter is asking related to the “process starting over.” If unauthorized use is reported management actions will follow as described in the Adaptive Management portion of the OHV Monitoring Strategy and Chapter 4 of the EA.

Comment 10f:

From first hand experience, native plant seeds can remain viable and sprout four years after being sowed. Botanists have prioritized NNIP species. Excluding species of lowest concern, for how many years do seeds of NNIP remain viable, and how does this compare with the duration of unauthorized use site monitoring?

Response 10f

First, it should be noted that the post-opening monitoring program is intended to monitor “estimates of the types and amounts of current use, presence and effectiveness of signs or closure devices, resource damage, presence of user-created routes, and presence of unauthorized use.” (EA page 28). The monitoring forms do include entries for invasive species, however, this monitoring effort is primarily intended to detect any unauthorized use so that it can be quickly addressed through increased enforcement, signs, or closure devices.

Native and non-native plant seeds can remain dormant and sprout years later. Different species have different seed viability. We have found seed viability information for some of the invasive plants on the ONF (Shackleford 2012). For example, garlic mustard seed can remain viable for at least ten years, purple loosestrife 5 to 20 years, spotted knapweed many years. Seeds could be brought to the connector route one year and germinate many years later, well after the two years of specific monitoring for this project. The Forest manages NNIP infestations under the Forest NNIP Control Project. As part of this program the Forest does not regularly and systematically monitor all our roads for new invasive plant infestations. However, as stated on page 22 of the EA, ongoing public education, including work with OHV user groups, as well as regular training for Forest Service employees, can help new invasive plant sites be detected early and controlled. If a high priority invasive plant like garlic mustard were to be introduced to the Connector Route we cannot predict how soon it would be discovered, but thereafter management would begin in accordance with the NNIP control plan.

Shackleford, Ian. 2012. **Invasive Plants of the Ottawa National Forest: Seed viability.** Unpublished. US Forest Service. Ironwood, Michigan.

Comment 10g:

Expanding on my previous comments, page 6, ONF monitoring guide item ID #44b is virtually identical to #5c. Will monitoring conducted fulfilling #44b be included in the OHV monitoring strategy?

Response 10g

The 2007 Forest Plan Monitoring Guides lists item 5c as “To what extent are road and trail closures effective in prohibiting unauthorized motor vehicle use?” Monitoring item 44b is “To what extent are road closures on decommissioned roads effective in prohibiting unauthorized motor vehicle use?” As shown in the 2011 Monitoring and Evaluation Report (M&E), item 44b and 5c are nearly identical and have been combined and are answered together each year they are reported.

One goal of the 2012 OHV Monitoring Strategy is to gather data to help answer item 5c as it was recognized in previous Monitoring and Evaluation Reports that the Forest did not have sufficient information to do so. See the following on page 1 of the Monitoring Strategy:

These questions are identified and described further in Chapter 4 of the 2006 Forest Plan (As discussed below, bolded are questions for which we have identified a need for further monitoring).

1. *What are the effects of OHVs on the physical and social environment? (Is resource damage occurring?)*
2. *How effective are forest management practices in managing OHV use?*
3. ***To what extent are road and trail closures effective in prohibiting unauthorized motor vehicle use?** [EMPHASIS ADDED]*
4. *What amount of road routes and recreation trails are designated open for OHV riding and provide connections to other public trails?*
5. *To what extent is the Forest providing a range of motorized and non-motorized recreation opportunities that incorporate diverse public interests yet achieve applicable management areas objectives and desired conditions?*

Every one to five years, the Monitoring and Evaluation (M&E) report responds to these questions. In 2009 and 2010, the M&E Report documented the need for additional data collection to help answer the question regarding road trail closure effectiveness (#3 above) stating: “It is difficult to say how effective trail and road closures are because the Ottawa does not systematically collect data on how many users obey the closures compared to the number or percentage of users who violate closures.”

Comment 10h:

Will new road/trail monitoring form reports be shared with LEOs and FPOs?

Response 10h

Yes. The monitoring data will be reported in Forest Monitoring and Evaluation Reports and, as such, will be provided to all employees including LEOs and FPOs. In cases where additional enforcement measures are needed, law enforcement will be notified. See the following excerpt from page 5 of the Monitoring Strategy:

“Corrective measures to address unauthorized use would be established based on the assessment of conditions, identification of the causes leading to violations (either intentional or unintentional), and resolution of issues. Measures may include establishment of effective barriers, signing, and/or other public education efforts and increased enforcement patrols.”

See also EA page 28.

Comment 10i:

An issue that will profoundly impact the effectiveness of implementing the otherwise well thought out OHV monitoring strategy is “Funding and available personnel”, as stated on pages 2,3, and 4 of the strategy. In looking through the ONF monitoring guide, OHV use is specifically the topic in item ID numbers 5a, 5b, 5c, 13, and 14. OHV use certainly is involved in numbers 12a and 44b. No other visitor use is specifically mentioned in the ONF Monitoring guide, which indicates how appropriate and important monitoring and evaluating OHV use is, as well as indicating the environmental and monetary cost of permitting OHV use.

Comment 10i

Refer to Forest Plan Final Environmental Impact Statement (pages 1-5 to 1-7). OHV management was a principle issue that was used to measure differences between the alternatives proposed at the time of Forest Plan Revision. It was one of several key ‘needs for change’ evaluated for Forest Plan Revision and as a result of the Forest Plan Revision was one of the most substantial changed conditions on the Forest due to the prohibition of cross-country travel on motorized vehicles. Therefore, it also became a focus issue for monitoring the implementation of the Forest Plan.

Chapter 4 of the Forest Plan presents the monitoring questions and the drivers for including the various questions. Drivers of the OHV monitoring questions include:

- *The National Forest Management Act*
- *Forest Plan Goals 1, Goal 3, and Objectives 9b and 9c.*
- *Forest Service Travel Management Regulations (36 CFR 212): “Off-road vehicle use shall be planned and implemented to protect land and other resources, promote public safety, and minimize conflicts with other uses of the National Forest System lands. Forest planning shall evaluate the potential effects of vehicle use off roads and, on the basis of the requirements of 36 CFR 212, classify areas and trails of National Forest System lands as to whether or not offroad vehicle use may be permitted.*

OHV Management was an important issue at the time the Monitoring Plan was developed and still remains an important issue for the Ottawa. Refer to Forest Plan Final Environmental Impact Statement (pages 1-5 to 1-7). OHV management was a principle issue that was used to measure differences between the alternatives proposed at the time of Forest Plan Revision.

Comment 10j:

The 5-year schedule indicates that implementing “recommended” mitigation roadwork for this one connector is costly (\$457,800), but the schedule does not include the costs of “Other” mitigation road work (\$152,00). The connector has future monetary costs: road and trail maintenance, NNIP treatments, law enforcement, to name a few. There is a cost for pre-opening monitoring that has been performed. There are other past, present, and future costs. Do connector routes have a stand alone budget, or is all this a burden on the Forest-wide budget?

Is dedicating funding and personnel resources for the OHV monitoring strategy a priority over funding all mitigation measures included in the engineering reports?

Response 10j

Travel Management, including OHV Monitoring, has been identified as a Forest priority. However, neither the Monitoring Strategy nor the Mixed Use Analysis Recommendations are prioritized over the other. They are both important aspects of the project and funding has been committed to do the work. Funding for all of these aspects of the work comes through the federal appropriations process in different budget line items. In addition, we work with partners to help with monitoring, installing signs, and repairing damaged roads and trails to help us achieve these goals despite limitations in appropriated funds.

Comment 10k:

Has due consideration been given to amending the forest plan so as to eliminate direction for implementing connectors for economic reasons?

Response 10k

This comment is outside of the scope of this project as it refers to decisions that are already made at the Forest Plan level. There has been no need to change the Forest Plan identified.

Comment 10l:

Given the minute percentage of forest visitors benefitting from Connectors, the negative impact of OHV use upon the overwhelming majority of forest visitors, and the negative environmental impacts of OHV use upon the Forest, isn't a cost-benefit analysis through an environmental impact statement appropriate?

Response 10l

See response 9c.

Comment 10m:

The EA could have never been written using only the contents of the project file as of September 20, 2012. The absence of specialist's reports alone would have negated this. The absence of an organized project file does not breed confidence that a Connector's impact on forest resources and forest visitors can be managed. The public cannot comment on what is not disclosed.

Response 10m

There is an organized project file that is created and maintained throughout the project and finalized at the time of the Decision. This project file is contained in Forest Service electronic filing system.

At the time of public review the project file contained the Biological Evaluation, field notes, references, meeting notes, and out of date drafts of engineers mixed use analysis. Two items referenced in the EA that the commenter was seeking were not yet saved in the appropriate file location and were provided to him as a result of a FOIA request on October 1, 2012. These included the Summary of Mixed use Recommendations and 5-year Reconstruction Schedule and the Ottawa OHV Monitoring Strategy. Updated Mixed Use Analysis Reports were also provided. The commenter did not receive these documents until very near the close of the comment period, so he was provided additional opportunity to comment on these documents (see phone conversation records in the project file).

It is correct that there are no 'specialist reports' like the commenter may have seen in past projects. For this project, the specialists prepared text that was incorporated into the EA or Analysis Framework in its entirety and therefore supplemental documents that repeated this text were not necessary.

Comment 10n:

The Ottawa is under new management, and I feel confident that past practices concerning public involvement have been noted. To accept the invitation offered to expand my comments seemed appropriate and respectful.

Response 10n

Comment noted.